

Chapter 2:

Project Description & Alternatives Examined

2.0 PROJECT DESCRIPTION & ALTERNATIVES EXAMINED

2.1 INTRODUCTION & TERMS OF REFERENCE

This section of the EIAR has been prepared by **John Spain Associates, Planning & Development Consultants**, and provides a description of the proposed development and also explains the evolution of the scheme design through the reasonable alternatives examined. This chapter of the EIAR was prepared by Paul Turley, BA, MRUP, Dip Environmental & Planning Law, MIPI, Executive Director. The description of the proposed development is one of the two foundations upon which an EIAR is based (the other being the description of the existing environment described in this chapter and by each of the specialist consultants in the subsequent chapters). It is also a requirement of the EIA Directive (as amended) to present an outline of the main alternatives considered and a justification of the final proposed development.

A systematic approach in accordance with the Draft Guidelines on the Information to be Contained in EIARs (2017), Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018), and other EIA guidance documents was used to ensure all relevant aspects of the development are accurately and fully described. The objective is to provide a description of the proposed development in sufficient detail, which when taken together with the description of the existing environment provided, will allow an independent reader without acquired technical environmental knowledge, to understand the significant impacts likely to arise from the proposed development.

The description of the proposed development is set out in this chapter and the following chapters by each specialist consultant in terms of those environmental topics which will form the basis of the impact assessment process and the characteristics of the proposed development which could potentially affect population, human health, cultural heritage and archaeology, biodiversity, landscape and visual impact, land and soil, water, air quality, climate, noise, vibration, microclimate, daylight and sunlight, material assets and the interaction between the aforementioned factors and principle mitigation and monitoring measures. The EIA Directive also requires that the description of the site, design, size or scale of the development, considers all relevant phases of the existence of the project from its construction through to its existence and operation (and where applicable its restoration or decommissioning).

This EIAR document fully reflects the key environmental factors of the proposed development which were recognised from the scoping carried out by the design team and the level of detail required will vary considerably according to the sensitivity of the existing environment and the potential of the project for significant effects.

2.2 SITE LOCATION AND DESCRIPTION

2.2.1 Site Location and Description

The application site is located within the Frascati Centre, Frascati Road, Blackrock, Co. Dublin. The construction of the permitted Rejuvenation Project, permitted under Reg. Ref.: D14A/0134 (which was subject to an EIS), as amended, is now substantially complete. Construction on the main structural elements of the Phase 1 residential development, permitted under Reg. Ref.: D17A/0950 & ABP Ref.: 300745-18, commenced in March 2020. The permitted Phase 1 residential development was subject of an EIAR in 2018.

The proposed development, which relates to the front and northern portion of the Frascati Centre seeks permission for alterations to the Phase 1 permission for 45 no. apartments (Reg. Ref.: D17A/0950 & ABP Ref.: 300745-18), from second to fourth floor level of the rejuvenated Frascati Centre. The proposed development also includes the provision of 57 no. additional apartments, as an extension of the Phase 1 permission, located above the permitted podium car park to the north west of the centre, as a Phase 2 residential development. The subject application therefore relates to a total of 102 no. residential units.

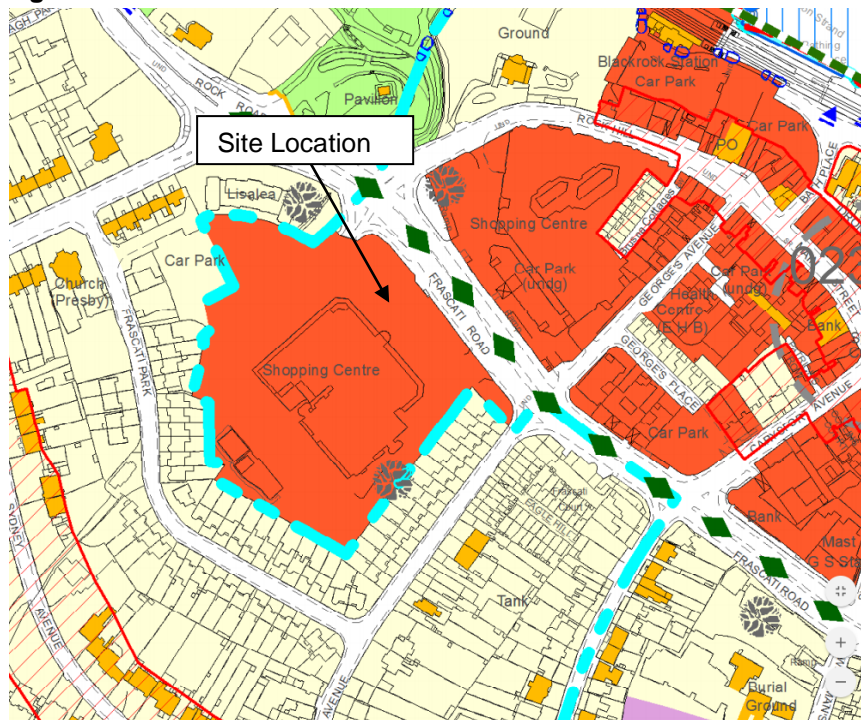
The subject lands are primarily zoned for 'District Centre' uses, with a small element of the car park area of the site zoned 'Objective A- Residential' and is located within the core retail area of Blackrock village as defined by the Dun Laoghaire Rathdown County Development Plan 2016–2022. The Frascati Centre is situated on Frascati Road / N31 to the immediate west of Blackrock Village and approximately 8 kilometres south-east of Dublin City Centre. The N11 is located 1.5 kilometres to the west, the M50 is 3.5

kilometres further south-west. Blackrock lies adjacent to the coastline of Dublin Bay, a proposed Natural Heritage Area and Special Protection Area. Blackrock Park, located to the north of the district centre, is a valuable amenity for the area.

Blackrock Dart Station, which is situated centrally within Blackrock village, is situated approximately 300m to the east of the application site. Quality bus routes serve the Frascati Road and Rock Road and also the N11 corridor.

The application site which has an area of 2.67 hectares, is bounded by the Frascati Road to the north-east, residential properties facing onto George's Avenue to the south-east; the rear of residential properties on Frascati Park to the south and south-west; and the rear of Lisalea apartments and associated access road and other residential properties on Mount Merrion Avenue to the north. The established residential properties along Frascati Park and Georges Avenue, to the south and west of the application site, comprise mainly of two storey terraced and semi-detached dwellings.

Figure 2.1: Site Context and Location



Source: Zoning Map Extract from DLRC Development Plan

The subject site is primarily zoned objective DC- *“to protect, provide for and/or improve mixed-use district centre facilities”* in the Dun-Laoghaire Rathdown Development Plan 2016 - 2022.

The site is also located within an area subject to the Blackrock Local Area Plan, which was adopted by Dun Laoghaire Rathdown County Council in March 2015. In respect to the subject site, the Blackrock LAP supports a mix of uses at the Frascati Centre including residential.

The subject site is served by a high-quality public transport network including the DART and Dublin Bus' Rock Road Quality Bus Corridor (QBC). The site is accessed from Frascati Road which traverses the northeast boundary of the site.

Plate 2.1: Photo of the Subject Site



On the opposite side of the Frascati Road the Friend's First former Enterprise House office site has recently completed redevelopment for a new five storey office building, as permitted under Reg. Ref.: D16A/0418 and ABP PL06D.247702, as amended.

Blackrock Shopping Centre is located opposite the centre also and is also undergoing rejuvenation. The centre was built in 1984 and contains 40 no. retail/commercial units including the SuperValu supermarket which is the anchor tenant. The rejuvenation works permitted at Blackrock Shopping Centre under Reg. Ref.: D17A/0644 are currently being implemented on site.

Further detail on the planning history of the subject site and surrounding area is included in Appendix 2.1, including details of permissions on the subject site, current live applications on the site and permissions in the vicinity of the site. The details of these permissions / applications were provided to the EIAR consultancy team and have informed the cumulative impact assessment undertaken as part of the preparation of this EIAR, with each consultant considering and undertaking their own planning history search in respect to their cumulative impact assessment where necessary.

Figure 2.2: Site Location Map with Application Site in Red and Extent of Phase 1 and Phase 2 Development the subject of this SHD Application Outlined in Green

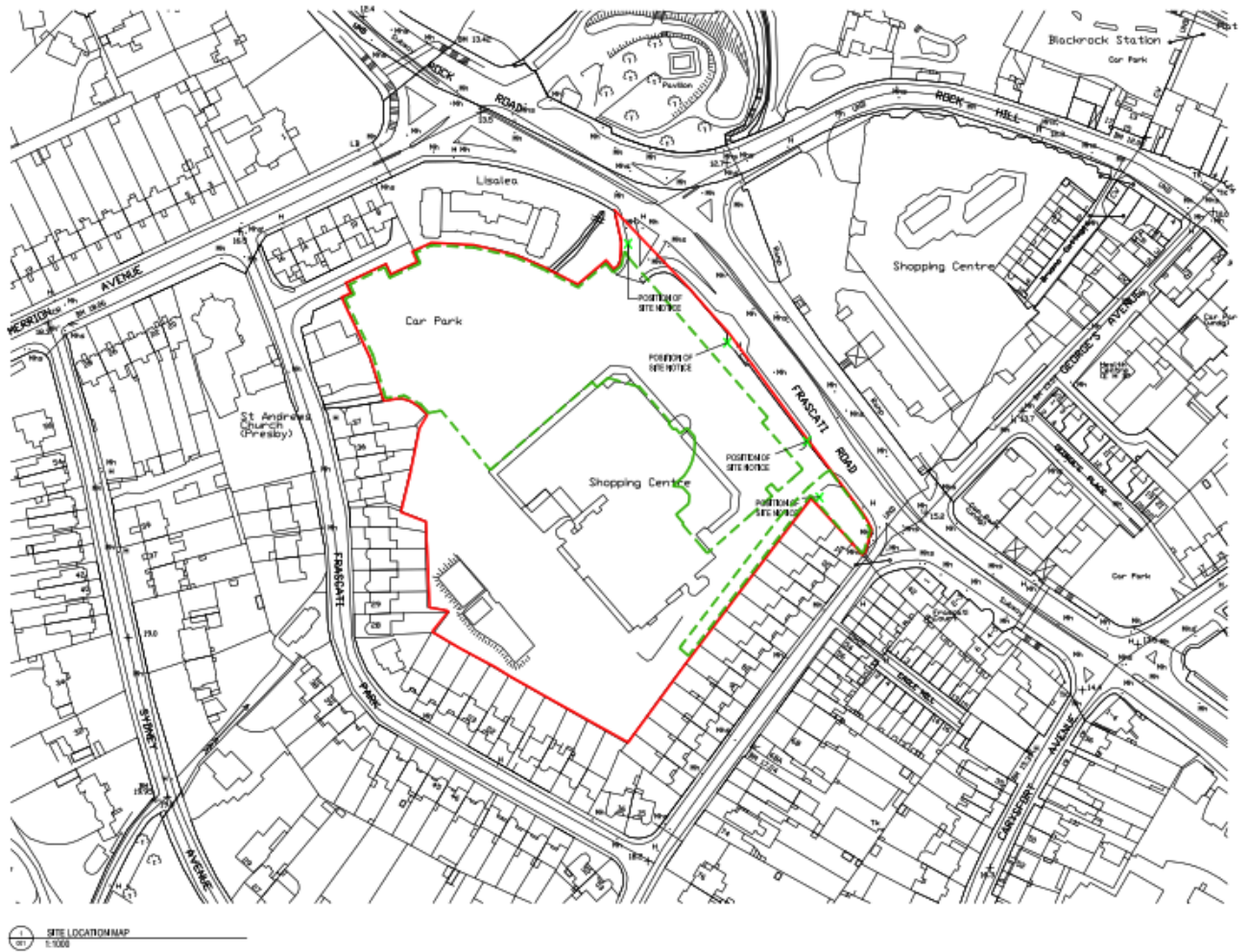


Figure 2.3: Aerial Photograph of Blackrock



2.3 PROJECT OVERVIEW

The description of the proposed development, as set out in the public notices is as follows:

“The proposed development relates to alterations to the Phase 1 permission for 45 no. apartments (Reg. Ref.: D17A/0950 & ABP Ref.: 300745-18), from second to fourth floor level of the rejuvenated Frascati Centre. The proposed development also includes the provision of 57 no. additional apartments, as an extension of the Phase 1 permission, located above the permitted podium car park to the north west of the centre, as a Phase 2 residential development. The subject application therefore relates to a total of 102 no. residential units.

The proposed alterations to the 45 no. apartments (Block A and B) and associated development, permitted under the Phase 1 residential development, includes the following:

- Internal rationalisation of the permitted units, including changes in overall unit size and internal layouts, and associated external alterations including the provision of winter gardens.*
- Provision of an external walkway connection between the Phase 1 and Phase 2 residential blocks at second floor level.*
- The refuse, car and cycle parking facilities permitted at lower ground floor level will be altered to cater for the additional residential units, including the introduction of a barrier control system.*
- The main entrance to the Phase 1 residential scheme from Frascati Road will serve both the permitted and proposed units.*
- A concierge facility room to serve the overall residential development is proposed at second floor level near the main core of Phase 1, with an associated minor reduction in the area of the permitted communal terrace at second floor level.*
- The communal open space for Phase 1 and 2 will be accessible to all residents.*
- Alterations to the cycle parking provision at lower ground floor / basement level and at the first-floor level podium car park.*

The Phase 2 proposal consists of 20 no. studios, 22 no. 1 beds and 15 no. 2 beds (57 no. apartments) in three no. blocks (Block D, E & F), arranged around a central communal courtyard space, above the existing and permitted podium car park to the north west of the centre. Block D is a five storey block, Block E is a part two to part four storey block and Block F is a part two to part three storey block, all above three levels of podium / basement car park. Balconies / winter gardens are provided to all apartments (on the north western, north eastern, south western elevations and into the internal courtyard) and access to the blocks is via stair / lift cores and an external walkway fronting the communal courtyard. A roof terrace is also proposed at fifth floor level of Block E.

The proposal includes the allocation of 57 no. car parking spaces at lower ground floor level and 214 no. bicycle parking spaces at lower ground and surface level for the 102 no. residential units. The proposal includes alterations to existing surface car parking to provide additional landscaping and bicycle spaces, a bin storage area and stair / lift cores are proposed within the existing / permitted basement / podium car parks below the Phase 2 residential units, and the proposal includes all associated ancillary site development works. The proposal also includes alterations to the location of 30 no. permitted cycle parking spaces associated with the rejuvenation of the Frascati Centre, Reg. Ref.: D14A/0134, as amended.”

The application site area is 2.67 ha. The green line illustrates the extent of the Proposed Phase 1 and Phase 2 residential development and associated works the subject of this SHD application. The basement area, which will accommodate the car parking area for the residential units, has been constructed. The replacement car parking for the retail floorspace is provided in an additional podium level permitted under the Phase 1 permission. The Rejuvenation Project provided for partial realignment of the Priory Stream which is culverted under the site, and these works have been implemented as part of the development completed to date on site. The proposed Strategic Housing Development has no impact on the culverted stream (see Chapter 8- Water).

The proposed Strategic Housing Development has been carefully designed to complement the rejuvenation project, which addressed the urban and architectural design issues associated with the shopping centre by creating a new building façade in closer proximity to Frascati Road with greater activity during the day and evening. The height and massing have been designed and positioned to provide an appropriate scale to Frascati Road whilst respecting the residential amenity of adjacent residential properties to the south, at Georges Avenue, west towards Frascati Park and north at Lisalea.

The proposed Strategic Housing Development will contribute to and promote the renewal and regeneration of the area by creating a strong urban edge along Frascati Road, which has already been significantly enhanced through the Rejuvenation Project which provides for a more permeable urban landscape and higher quality public realm with improved pedestrian connectivity with the core retail area of Blackrock village. The proposed Strategic Housing Development will add to the mix of uses and vibrancy of the District Centre in accordance with the planning policy objectives for the site.

The application is accompanied by a Design Statement and drawings prepared by Reddy Architecture + Urbanism, which provide a rationale for the design and layout of the proposed scheme.

2.4 STATUTORY PLANNING CONTEXT

2.4.1 National, Regional, County and Local Planning Context

The subject lands are subject to national, regional, and local planning policy. The following outlines the key planning documents of relevance to the future development of the subject lands. This section will not address the detailed planning policies and objectives contained in the various plans which are relevant to the proposed Strategic Housing Development, as these are addressed in a separately bound Statement of Consistency / Planning Report and Material Contravention Statement on Building Heights prepared by John Spain Associates which accompanies the planning application.

National

- National Planning Framework - Project Ireland 2040 (2018);
- Urban Development and Building Height Guidelines (2018);
- Sustainable Urban Housing: Design Standards for New Apartments (2018);
- Design Manual for Urban Roads and Streets (2013);
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009);
- The Urban Design Manual (A Best Practice Guide) (2009);
- Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines - Quality Housing for Sustainable Communities (2007);
- Smarter Travel: A Sustainable Transport Future - A New Transport Policy for Ireland (2009);
- The Planning System and Flood Risk Management – Guidelines for Local Authorities (2009); and
- Architectural Heritage Protection Guidelines for Planning Authorities (2011).

Regional

- Eastern and Midland Regional Assembly – Regional Spatial & Economic Strategy (RSES), (2018);

County

- Dun Laoghaire Rathdown County Development Plan 2016-2022

Local

- Blackrock Local Area Plan 2015

The Dun Laoghaire Rathdown County Development Plan 2016-2022 sets out the planning policy context for future development in the County up to 2022 and beyond including land use and development objectives, settlement hierarchy, development control standards and policies and objectives for the protection of the built and natural environment of the County and is the most relevant document pertaining to the future development of the subject lands.

The subject site is primarily zoned DC (District Centre) in the Dun Laoghaire Rathdown County Development Plan 2016-2022 with the objective *'to protect, provide for and / or improve mixed-use district centre facilities'*, whilst part of the site is zoned objective *'A- Residential'*.

The site is also located within an area subject to the Blackrock Local Area Plan, which was adopted by Dun Laoghaire Rathdown County Council in March 2015. In respect to the subject site, the Blackrock LAP supports a mix of uses at the Frascati Centre including residential.

The Frascati Centre has an extensive planning history. Full details of the planning history for the application site are set out in Appendix 1 of the Statement of Consistency / Planning Report accompanying the application. Appendix 2.1 of this chapter provides details of the relevant planning

history of the subject site and adjacent lands of relevance to the EIAR and the cumulative impact assessment.

2.5 ALTERNATIVES EXAMINED

2.5.1 Introduction

The EIA Directive (2014/52/EU) requires that Environmental Impact Assessment Reports include “A description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.”

The presentation and consideration of various alternatives investigated by the project design team is an important requirement of the EIA process. This section of the EIAR document provides an outline of the main alternatives examined throughout the design and consultation process. This serves to indicate the main reasons for choosing the development proposed, taking into account and providing a comparison the environmental effects. For the purposes of the Regulations, alternatives may be described at three levels:

- Alternative Locations.
- Alternative Designs.
- Alternative Processes.

The DHPLG 2018 EIA Guidelines state:

“Reasonable alternatives may relate to matters such as project design, technology, location, size and scale. The type of alternatives will depend on the nature of the project proposed and the characteristics of the receiving environment. For example, some projects may be site specific so the consideration of alternative sites may not be relevant. It is generally sufficient for the developer to provide a broad description of each main alternative studied and the key environmental issues associated with each. A ‘mini- EIA’ is not required for each alternative studied.”

Pursuant to Section 3.4.1 of the Draft 2017 EPA Guidelines, the consideration of alternatives also needs to be cognisant of the fact that *“in some instances some of the alternatives described below will not be applicable – e.g. there may be no relevant ‘alternative location’...”*

The Draft 2017 EPA Guidelines are also instructive in stating:

“Analysis of high-level or sectoral strategic alternatives cannot reasonably be expected within a project level EIAR... It should be borne in mind that the amended Directive refers to ‘reasonable alternatives... which are relevant to the proposed project and its specific characteristics’”.

The proposed development seeks to provide alterations to the Phase 1 permission for 45 no. apartments (Reg. Ref.: D17A/0950 & ABP Ref.: 300745-18), from second to fourth floor level of the rejuvenated Frascati Centre. The proposed development also includes the provision of 57 no. additional apartments, as an extension of the Phase 1 permission, located above the permitted podium car park to the north west of the centre, as a Phase 2 residential development. The subject application therefore relates to a total of 102 no. residential units.

The site is zoned for District Centre uses, partly for ‘Residential’ use and subject to a Local Area Plan both of which supports a mix of uses on the site, which the proposed additional residential use will assist in delivering. Having regard to the District Centre zoning and the policy support for mixed use development, particularly the delivery of residential use within district centres. Having regard to the above nature of development it was not considered necessary or reasonable to consider alternative sites for the proposed development.

A ‘do-nothing’ scenario would result in Phase 1 residential development being implemented in full, i.e. 45 no. apartment units over 3 no. storeys, from second to fourth floor level, over the permitted ground and first floor levels of retail / restaurant floorspace and permitted lower ground floor car park, as assessed under the EIAR submitted with the 2017 application, and without the alterations proposed in this SHD.

The proposed Strategic Housing Development, which includes alterations to Phase 1- 45 no apartments, and 57 no. apartment proposed as Phase 2 is considered to represent a more appropriate, sustainable and efficient use of these strategically located District Centre zoned lands, particularly having regard to the opportunity to provide an enhanced mix of uses, a greater density of residential development within the core of Blackrock Village and improved urban edge to Frascati Road in close proximity to public transport nodes.

Alternative design and layouts for the subject lands were considered and discussed by the design team over an approximately a ten-month period up to the finalisation of the scheme. This process was informed by pre-application discussions with the Planning Authority (1 no. S. 247 meeting) and An Bord Pleanála (1 no. tripartite meeting). The significant environmental issues and potential effects which informed this consideration related to ecology, traffic management, landscape and visual impact and potential impacts on the amenities of established properties and uses in the area. These considerations have informed the consideration of alternative layouts and heights of buildings, open space and road and access arrangements.

2.5.2 Description of Alternative Locations

As outlined above the site is zoned for 'District Centre' and partly for 'Residential' uses and is specifically identified in the Dun Laoghaire Rathdown County Development Plan 2016 – 2022 as part of Blackrock District Centre. The Development Plan and Blackrock LAP 2015-2022 both support and promote the delivery of a mix of uses on the subject site, including residential, which the proposed Strategic Housing Development will deliver. In addition, the LAP supports up to five storeys of development on the site, with a transition to neighbouring residential land uses. Thus, the consideration of alternative sites for the proposed residential units was not considered necessary.

2.5.3 Description of Alternative Designs

This section provides an overview of how the proposed development has evolved to date by way of consideration of alternative designs and how the final scheme design has been reached.

The environmental issues which have most informed the design process to date relate to landscape and visual and daylight and sunlight impacts. These issues have informed the consideration of alternative designs and layouts up to the formalisation of the scheme submitted in this final application to the Board.

The following provides an analysis of the different options for the site as the development proposals progressed over the last number of years. The key considerations and amendments to the design of the scheme, having regard to the key environmental issues, are also discussed.

Alternative 1- Refused Frascati Shopping Centre Redevelopment Application, Reg. Ref. D05A/0549 – An Bord Pleanála Ref. PL 06D.216840

This application was for a comprehensive mixed-use redevelopment of Frascati Shopping Centre. This proposal was superseded by the 2014 rejuvenation project and the subsequent Phase 1 residential permission. The application was refused planning permission by the Planning Authority and was subsequently withdrawn whilst subject to a first party appeal to An Bord Pleanála. This scheme was accompanied by an EIS. This application was considered by the design team as a useful reference point at the outset of the design process for the residential extension to the Rejuvenated Frascati Centre, as it provided for five storeys of development at Frascati Road.

This application proposed the demolition of the majority of the shopping centre, excluding Debenhams and the adjacent ground level retail units. The scale and quantum of retail and residential development is illustrated in Figure 2.4 and 2.5 below.

Figure 2.4 - 2.5: Images of the Scheme Proposed Under Reg. Ref.: D05A/0549



Dun Laoghaire Rathdown issued a decision to refuse planning permission to Mecca International Limited on the 22nd of February 2006 for a mixed-use retail (expansion), new residential, related public parking and ancillary uses and works including road works, all at the site of the established district shopping centre at Frascati.

The decision of the Council to refuse permission for the proposed development was based on the following consideration:

“The proposed development, due to the quantum of retail and residential uses, would intensify road usage in the vicinity of the site and would increase pedestrian movements crossing the N31 between the Frascati and the Blackrock Shopping Centres. In the absence of a segregated safe pedestrian/mobility impaired and disabled interlink bridge between these areas, it is considered that the development as currently proposed would endanger public safety by reason of a traffic hazard and would be contrary to the proper planning and sustainable development of the area.”

The above reason for refusal was based on the recommendations of the Transportation Department of Dun Laoghaire Rathdown County Council. The Planner’s report prepared in respect of the proposal noted that the development was:

- *In the main consistent with the policies of the Development Plan;*
- *Generally compliant with Development Control Objectives;*
- *Consistent with the Retail Planning Guidelines; and*
- *Acceptable in terms of design considerations;*

The decision of the Council to refuse permission for the development was subject to a first party appeal to An Bord Pleanála (PL 06D.216840) on the 20th of March 2006. On the 30th of March 2007, An Bord Pleanála sought clarification on 3 no. items relating to proposals and agreements in respect of pedestrian link across the Blackrock By-Pass; full details of mitigation measures to address impact of proposed multi-storey car park on adjoining residential properties, and an increase in setbacks along the south eastern boundary.

The planning application was subsequently withdrawn by the applicant in accordance with Section 140 of the Planning and Development Act (as amended) on the 25th May 2007.

We note, as summarised above, that no significant concerns were raised in respect to the proposed residential use and the heights proposed along the Frascati Road corridor.

Option 2- Permitted Frascati Centre Rejuvenation Scheme (Reg. Ref.: D14A/01340)- Substantially Complete

The subject proposal for a Strategic Housing Development relates to alterations to the Phase 1 permission for 45 no. apartments (Reg. Ref.: D17A/0950 & ABP Ref.: 300745-18) which replaces the permitted second floor restaurant and storage space permitted under the Rejuvenation Project and

provide for three levels of residential floorspace from second to fourth floor level above retail. The proposal for a Strategic Housing Development also provides for a Phase 2 proposal consists of 20 no. studios, 22 no. 1 beds and 15 no. 2 beds (57 no. apartments) in three no. blocks (Block D, E & F), arranged around a central communal courtyard space, above the existing and permitted podium car park to the north west of the centre.

Figure 2.6: CGI View of the Permitted Rejuvenation Project



It is considered that the permitted / implemented scheme does not result in the most sustainable use of this District Centre zoned site and the provision of 102 no. residential units on the site is an appropriate design response, which does not result in any significant adverse environmental impacts as demonstrated in this EIAR.

Option 3 – Phase 1 Residential Extension (Reg. Ref.: D17A/0950 & ABP Ref.: 300745-18)

As outlined above, the subject proposal for a Strategic Housing Development relates to alterations to the Phase 1 permission for 45 no. apartments (Reg. Ref.: D17A/0950 & ABP Ref.: 300745-18), from second to fourth floor level of the rejuvenated Frascati Centre. The proposed development also includes the provision of 57 no. additional apartments, as an extension of the Phase 1 permission, located above the permitted podium car park to the north west of the centre, as a Phase 2 residential development. The subject application therefore relates to a total of 102 no. residential units.

The proposed alterations to the 45 no. apartments (Block A and B) and associated development, permitted under the Phase 1 residential development, includes the following:

- Internal rationalisation of the permitted units, including changes in overall unit size and internal layouts, and associated external alterations including the provision of winter gardens.
- Provision of an external walkway connection between the Phase 1 and Phase 2 residential blocks at second floor level.
- The refuse, car and cycle parking facilities permitted at lower ground floor level will be altered to cater for the additional residential units, including the introduction of a barrier control system.
- The main entrance to the Phase 1 residential scheme from Frascati Road will serve both the permitted and proposed units.
- A concierge facility room to serve the overall residential development is proposed at second floor level near the main core of Phase 1, with an associated minor reduction in the area of the permitted communal terrace at second floor level.
- The communal open space for Phase 1 and 2 will be accessible to all residents.
- Alterations to the cycle parking provision at lower ground floor / basement level and at the first-floor level podium car park.

The construction of the structural elements of the Phase 1 residential permission commenced in March 2020, under Reg. Ref.: Reg. Ref.: D17A/0950 & ABP Ref.: 300745-18. The proposed alterations relate to

non-structural elements, primarily relating to the internal layout of units and external finishes / winter gardens. The proposed alterations are not affected by the commencement of construction of the structural elements. The proposed alterations to Phase 1 do not seek to alter the height or overall massing of the permitted residential scheme, as the alterations are primarily internal or external treatment changes, which have been identified following a detailed design review by the applicant, agents and project architects.

It is considered that the permitted Phase 1 residential scheme does not result in the most sustainable use of this District Centre zoned site and the provision of 102 no. residential units on the site is an appropriate design response, which does not result in any significant additional adverse environmental impacts as demonstrated in this EIAR.

The main environmental impacts were addressed as part of the EIAR and during the construction of the Phase 1 development, which has commenced.

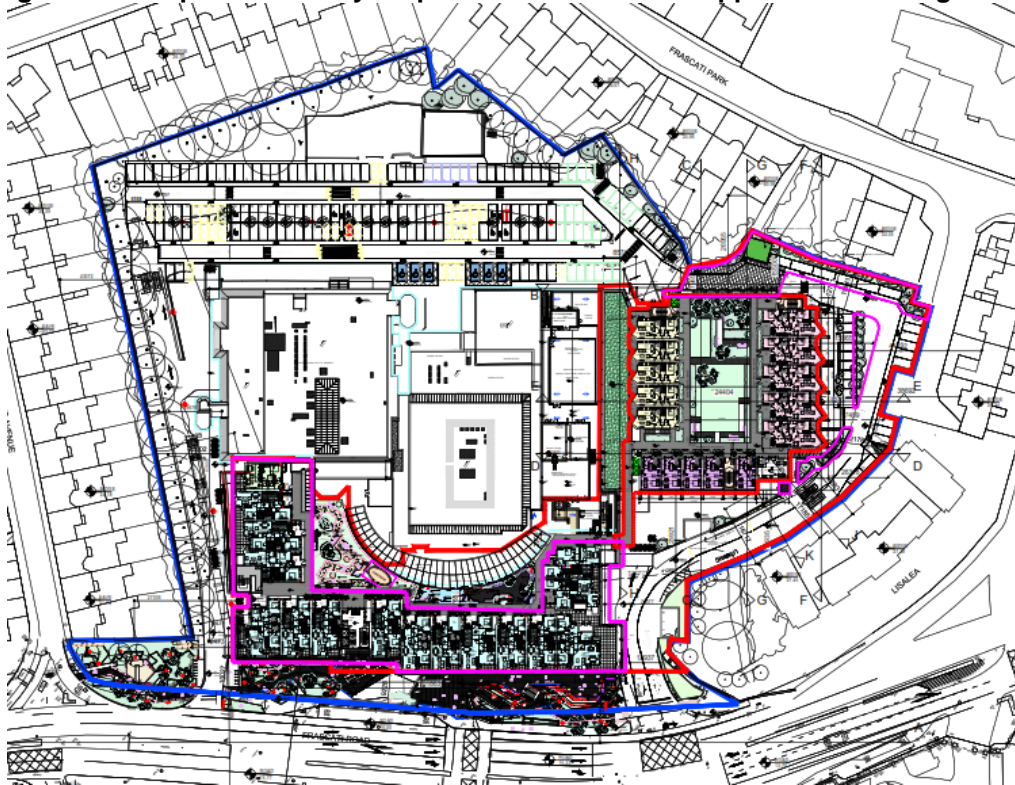
Figure 2.7: CGI of the Permitted Phase 1 Residential Development



Option 4 – SHD Pre-Application Consultation Meeting (ABP Ref.: 306989-20)

An earlier iteration for the subject scheme was submitted as a formal SHD pre-application consultation request to An Bord Pleanála. This scheme was the subject of a tripartite pre-application meeting on the 5th June 2020, under Section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016. This meeting was attended by representatives from Dun Laoghaire Rathdown County Council and the items on the Board's agenda were discussed, which broadly corresponded to the items raised in the Planning Authority's Opinion on the proposed development as submitted as a pre-application request to ABP.

Figure 2.8: Proposed Site Layout presented at SHD Pre-Application Meeting



Following the pre-application meeting, the Board's Opinion states that An Bord Pleanála *"is of the opinion that the documents submitted with the request to enter into consultations **constitute a reasonable basis for strategic housing development**". (Emphasis added)*. The Opinion further states that, pursuant to Article 285(5)(b) of the Planning & Development (Strategic Housing Development) Regulation 2017, the prospective applicant is notified that 17 no. items of specific information should be submitted with any application for permission.

The main points raised and discussed during the course of these pre-application meetings are summarised within Section 3 of the accompanying Statement of Consistency / Planning Report and Statement of Response prepared by John Spain Associates. Notwithstanding the Opinion stating that the pre-application proposals constituted a reasonable basis for an application, and as summarised in the Statement of Response, a series of further alterations to the SHD proposals have been incorporated to address issues raised by the Planning Authority, primarily relating to residential amenity and visual impact. The changes primarily relate to the proposed Phase 2 residential element of development and can be summarised as follows:

- Omission of 1 no. apartment unit at third floor level of Block F to reduce the corner height on the north western corner from 3 to 2 storeys and reducing impact on adjoining Lisalea. The overall height of the northwestern corner is reduced from 18.9m to 15.3m;
- Modified layout of Apartment No. 2315 at third floor level of Block F to avoid overlooking onto Frascati Park;
- Building line setback at the south eastern corner and reoriented stairs on 4th and 5th floor of Block D to reduce massing resulting in omission of 2 no. apartments. The separation distance to No. 37 Frascati Park has increased from 30.7m to 33.5m.
- The changes result in total number of units being reduced from 105 no. units to 102 no. units.

Preferred Option - Strategic Housing Development Submitted for Approval

Following the detailed feedback from An Bord Pleanála and DLRCC from the pre-application meetings and discussions, the applicant and design team have undertaken further detailed design development, including further correspondence with the Planning Authority, which is reflected within the final planning application proposals submitted for approval.

The subject scheme is described in detail in the following sections and also in the Statement of Consistency / Planning Report and Design Statement which accompanies this application. It is considered that the finalised design as assessed in this EIAR takes account of the key environmental factors relevant to the proposed Strategic Housing Development. The final scheme design has been informed by the various designs for the centre undertaken over a 15 year period and results in the optimal form of development in terms of delivering a mixed use District Centre and an improved urban environment, with a urban edge to Frascati Road.

In summary, the design of the proposed development takes into account all environmental effects raised in respect to previous design alternatives and provides for a development that has been optimised to amplify positive environmental effects whilst reducing negative environmental impacts wherever possible. The final proposed scheme also responds to the characteristics and constraints of the subject site vis a vis the previous iterations of the scheme and the alternative layouts considered.

2.5.4 Description of Alternative Processes

This is not considered relevant to this EIAR having regard to the nature of the proposed development / residential uses.

2.6 CHARACTERISTICS OF THE PROJECT

The description of the development as set out within the public notices has been provided in Section 2.4 above. The following provides a summary of the key characteristics of the project of most relevance to the EIAR, which should be read in conjunction with all accompanying application documents and reports. Each chapter of the EIAR includes details of the characteristics of the project of most relevance to that particular aspect of the environmental assessment.

Table 2: SHD Details of the Proposed Development

	Alterations to Phase 1	Proposed Phase 2	Phase 1 + Phase 2
Unit No's	45	57	102 no. Build to Sell units (intended for owner occupation or individual lease)
Unit Mix	3 no. 1 beds 36 no. 2 beds 6 no. 3 beds	20 no. studios 22 no. 1 beds 15 no. 2 beds	20 no. studios (19%) 25 no. 1 beds (25%) 51 no. 2 beds (50%) 6 no. 3 beds (6%)
Height	3 no. storeys residential above 2 storeys of retail	2-5 no. storeys above permitted podium car parks Block D (5 storeys), Block E (2-4 storeys) and Block F (2-3 storeys)	2-5 storeys above permitted Frascati retail and podium car park levels
Dual Aspect	100%. All dual aspect with the 3 bed corner units to be triple aspect.	100%. All dual aspect arranged around the podium courtyard	100% Dual Aspect
Communal Amenity Space	Communal terrace at second floor (545.16 sq.m) and roof terrace (99.8 sq.m)	Communal courtyard at first floor level (646.93 sq.m) and roof terrace at fifth floor level (230.8 sq.m)	Total 1,522.69 sq.m sq.m of communal amenity space. Average of 14.9 sq.m of amenity space per residential unit for the total (102 no. units)
Total GFA	9,223.1 sq.m		
Car Parking	57 no. basement car parking spaces for the 102 no. residential units proposed in Phase 1 and 2 (c. 0.56 spaces per unit)		

Cycle Parking	<p>214 no. bicycle parking spaces (148 cycle parking spaces in a secure area at the lower ground level as stacker type two-tier units plus 22 visitor parking spaces as ‘Sheffield’ type stands distributed at lower ground level, 40 no. spaces at ground floor level and 4 no. cargo cycle parking spaces)</p> <p>This exceeds the recommendation set out in the Apartment Guidelines of 1 bicycle parking space per bed-space plus 1 visitor space per 2 units which equates to 210 no. spaces.</p> <p>This is in addition to the 170 no. cycle spaces provided as part of the Frascati Centre rejuvenation project. The proposal includes alterations to the location of 30 no. permitted cycle parking spaces associated with the rejuvenation of the Frascati Centre, Reg. Ref.: D14A/0134, as amended. This is discussed further below.</p>
Residential Density	<p>Overall density of 38.2 no. units per hectares (Phase 1 and 2) based on the site area of 2.67 ha.</p> <p>Note: Not directly relevant planning standard due to residential forming part of a mixed-use district centre and the extent of the red line boundary of the entire Frascati Centre.</p>
Plot Ratio / Site Coverage	<p>Plot ratio is 1.30 and site coverage is 53%</p>

Apartments Guidelines

All apartments comply with *Sustainable Urban Housing: Design Standards for New Apartments — Guidelines for Planning Authorities 2018*. All units meet or exceed minimum standards and 100% of units are Dual Aspect. The Housing Quality Assessment prepared by Reddy Architecture + Urbanism lodged with the planning application for the proposed development provides further detail.

Residential Density

The net residential density of the proposed development will be 38.2 units per hectare based on the overall site area or 124 units per hectare, based on the extent of the Phase 1 and Phase 2 part of the application site of c. 0.82 ha, and a total of 102 no. residential units.

Building Heights

The height of the buildings have regard to the policies, objectives and guidance set out in the Blackrock LAP, which provides for up to five storeys on the site, and also the *National Planning Framework and the Urban Development and Building Height Guidelines 2018*, which places much greater emphasis on delivering compact urban growth, for growth to be located in cities and to provide for better utilisation of brownfield sites, including through the provision of greater building heights. An assessment of the landscape and visual impact of the proposed development is provided in this EIAR. In addition, the Material Contravention Statement on Building Heights prepared by John Spain Associates sets out the justification for the proposed building heights should the Board consider the proposals a material contravention of the Local Area Plan, based on the development management criteria under the Building Height Guidelines 2018 and the provisions under SPPR3.

It is considered that the proposal introduces a high-quality development, on a District Centre zoned, which supports a mix of use and a greater intensity of development. The design and scale of the proposed development has sought to respond to and respect the surrounding context and seeks to make a positive contribution and enhances the surrounding environment.

Car Parking

The total designated car parking provision is 57 no. basement car parking spaces for the 102 no. residential units. This equates to a ratio of 0.56 no. spaces per residential unit which is considered to be appropriate for this location due to proximity to surrounding services and public transport facilities.

The CDP recommends the provision of 1 no. car parking space per residential unit, but also acknowledge reduced provision can be justified in certain locations / subject to certain criteria. In addition, the Apartment Guidelines 2018 allow for a reduction in the provision of parking for central and or accessible urban locations, which the subject site is considered to fall within given adjacency to a QBC and within c. 300 metres of a DART station.

The Guidelines state the following in relation to Central and/or Accessible Urban Locations:

'In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances. The policies above would be particularly applicable in highly accessible areas such as in or adjoining city cores or at a confluence of public transport systems such rail and bus stations located in close proximity.'

The proposal provides a reduced overall car parking standard as referred to in the 2018 Apartment Guidelines, justified by the proximity of the proposed residential development to high quality public transport (high frequency urban bus services and DART station). This SHD application is accompanied by a Transportation Assessment Report and Mobility Management Plan prepared by NRB Consulting which provides a further rationale for the proposed quantum of car parking.

Cycle Parking

The proposed scheme proposes 214 no. cycle parking spaces at lower ground and ground floor level.

The proposed cycle parking provision complies with the 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities' dated March 2018, which recommends that 1 bicycle parking space per bed-space plus 1 visitor space per 2 units should be provided. Given 102 apartments with 159 bedrooms, this is a cycle parking requirement of 210 spaces. The proposed 214, which include 4 no. cargo cycle spaces as requested by DLRCC Transport Department, therefore meets this requirement.

The rejuvenation of the Frascati Centre provides for 170 no. cycle parking spaces, which are shown on the cycle parking plan and could also be utilised by visitors to the residential units.

Architecture & Design

The proposed residential development is designed to complement and be incorporated into the Rejuvenation of the Frascati Centre and configured so as to present as a well-proportioned façade to give consideration to the residential amenities adjacent to the site.

It is considered that the scale and design proposed for the residential development is acceptable at this site given the strategic location of the site in proximity to public transport facilities and the high amenity overlooking Dublin Bay. The proposed development contributes to providing a diverse mix of uses and further enhances the Rejuvenation of the Frascati Centre, which has recently completed construction.

We refer the Board to the Architectural Design Statement prepared by Reddy Architecture + Urbanisms which accompanies this application. The Design Report explains how the proposed development has regard to the surrounding urban context and a detailed description of the development approach for the proposed development which has informed the proposal submitted for planning approval. The design strategy for the proposed development is a response to the distinctive characteristics of the site, the prescribed land use zoning and the surrounding context.

The scale and massing of the proposed development has been carefully considered having regard to the nature of the surrounding development. The proposed height of the development is designed with regard to the Development Plan standards and Blackrock LAP (5 storeys) and gives careful consideration to the neighbouring residential properties on Georges Avenue with appropriate setbacks.

Residential Amenity

The permitted Phase 1 residential development gave careful consideration on how the development would impact houses on Georges Avenue and apartments at Lisalea. The proposed alterations to Phase 1 does not seek to alter this relationship of the permitted scheme, as amended by conditions, as no increase in unit numbers or height is proposed, and with the provision of winter gardens considered to be a positive addition.

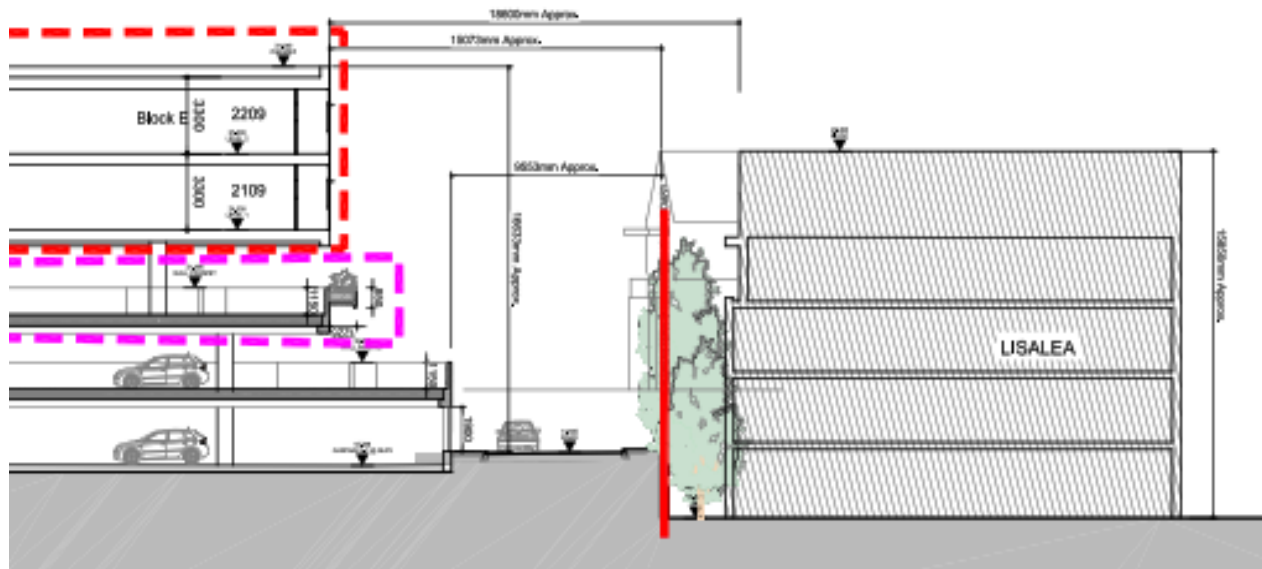
The proposed Phase 2 apartments facing onto the rear of Lisalea Apartment Block and the rear of properties on Frascati Park have been designed to address the potential impact of the proposed scheme on the residential amenity of existing residents. The apartments proposed in this area are provided in a stepped back building mass and there is a c. 28m separation distance between the proposed Phase 2 and No. 37 Frascati Park to the south, c.16-50m separation distance between corner of Phase 2 to

Lisalea apartments (please note Lisalea apartment block is 1.8m from the site boundary), as indicated in Figure 2.9 and 2.10 below.

Figure 2.9: Cross Section with 37 Frascati Park



Figure 2.9: Cross Section with Lisalea Apartment



The proposed separation distances are considered appropriate in the context of Section 8.2.3.3 of the DLR County Development Plan, which states the following:

*“All proposals for residential development, particularly apartment developments and those over three storeys high, shall provide for **acceptable separation distances between blocks to avoid negative effects such as excessive overlooking, overbearing and overshadowing effects** and provide sustainable residential amenity conditions and open spaces. **The minimum clearance distance of circa 22 metres between opposing windows will normally apply in the case of apartments up to three storeys in height.**” (Emphasis added)*

The separation distances between the buildings ranges from a distance of 16-28 metres and therefore, in some cases is below the Development Plan standard. We note that in certain instances, in build-up areas, the County Development Plan provides for reduced separation distances. Section 7.4 of the ‘Sustainable Residential Development in Urban Areas, 2009’ recognises that the minimum separation distance between opposing rear windows is 22m however depending on location the guidelines advise a degree of flexibility can be applied.

The proposed separation distances are considered to be acceptable having regard to Section 2.23 of the Apartment Guidelines 2018 which states *“the National Planning Framework signals a move away from rigidly applied, blanket planning standards in relation to building design, in favour of performance based standards to ensure well-designed high quality outcomes. In particular, general blanket restrictions on building height or building separation distance that may be specified in development plans, should be replaced by performance criteria, appropriate to location”*.

In addition to the significant separation distances, existing mature trees (to be retained), as indicated in Figure 2.9 and 2.10 above, help mitigate overlooking and potential impacts on residential amenity.

It should also be noted that the proposed Phase 2 residential development is above the permitted podium car park does not increase the building footprint of the permitted scheme. The residential units have been designed above the permitted podium car park with appropriate setbacks and angled living rooms to avoid negative effects such as overbearing and overshadowing and respect the residential amenities of existing properties in the vicinity of the site.

Furthermore, the eastern site boundary of Lisalea is heavily planted with both deciduous and evergreen shrubbery which will help screen any potential overlooking. The layout plans and sections demonstrate the separation distances of the proposed Phase 2 units from adjoining properties at Lisalea, Merrion Avenue and Frascati Park to the north east, north and west.

The proposed development is considered to be of a high quality and designed to avoid direct overlooking and will not adversely impact the residential amenity of adjacent properties, therefore the proposed separation distances are appropriate. In an urban context these separate distances are considered to be adequate and must be considered in the context of other planning objectives, such as increased density, urban design and streetscape improvements.

The proposed Phase 2 residential units will not have any material impact in terms of overshadowing of the residential properties which front onto Frascati Park, Mount Merrion and Lisalea Apartments (this is discussed in Daylight/Sunlight Chapter of this EIAR and the separate standalone Daylight Assessment prepared by BPG3). It is therefore submitted that the proposed residential development will have negligible impacts on the surrounding residential properties.

Daylight and Sunlight Assessment

The application is accompanied by a Daylight and Sunlight Assessment conducted by BPG3, which describes how the proposed alterations to Phase 1 and proposed Phase 2 development impacts upon the sunlight/skylight amenities on neighbouring properties and impacts on neighbouring gardens. The assessment focuses on the surrounding properties comprising Georges Avenue, Frascati Park, Mount Merrion Avenue and Lisalea Apartments. This is discussed further in the Daylight/Sunlight chapter of this EIAR.

The assessment concludes stating the following in relation to the proposed development:

“When assessed in the round, and in relation to the other factors which contribute to the proper planning and sustainable development of this area, it is possible to conclude that acceptable levels of daylight amenity would be provided within this development and that acceptable levels of daylight would remain available to neighbouring properties”.

It is considered that appropriate design measures have been considered by the design team, including the layout, location and setbacks of the proposed residential units, to ensure no adverse impacts on neighbouring properties arise, whilst providing a commercially viable residential development at an appropriate scale and design.

Landscaping

Landscape drawings and a Landscape Report have been prepared by Stephen Diamond Landscape Architects and accompany the application. The proposed landscape proposal provides additional planters to screen the proposed Phase 2 development which helps to mitigate any potential adverse impacts on neighbouring properties.

The proposed development provides two communal terraces at second floor level within the Phase 1 area with a total area of 545.16 sq.m and a communal courtyard within the proposed Phase 2 area measuring 646.93 sq.m. Roof terraces are also proposed at fifth floor level above the Phase 1 units (99.8 sq.m) and Phase 2 (230.8 sq.m) units. The combined total of 1,522.69 sq.m of communal amenity spaces equates to 14.9 sq.m per residential unit and exceeds the minimum requirement of 612 sq.m as required under the Apartment Guidelines 2018 (20*4+ 25*5 + 51*7 + 6*9). The communal open space for both Phase 1 and 2 will be accessible to all residents. The proposed landscape proposal is designed to connect with the existing landscape, adjacent land uses and avoid overlooking onto surrounding residential properties in the vicinity. The proposed communal courtyard for Phase 2 is outlined in Figure 2.10 below.

Figure 2.10: Proposed Phase 2 Courtyard



2.7 THE EXISTENCE OF THE PROJECT

2.7.1 Introduction

The purpose of this section is to provide a description of the proposed Strategic Housing Development at the Frascati Centre which considers all aspects of the project life cycle both during construction and post construction (and decommissioning if applicable). These include the following:

- Construction Stage (Land Use Requirements, Construction Activity & Significant Effects);
- Operation Stage (Processes, Activities, Materials Used);
- Changes to the Project; and,
- Secondary and Off-Site Developments

2.7.2 Description of Construction Stage

This section of the EIAR summarises the construction and phasing of the proposed development and summarises the measures to be taken to ensure that the impact of construction activity is minimised. The *Construction Management Plan* and *Construction and Demolition Waste Management Plan*, which are included as standalone reports with this application, should be referred to for a more detailed assessment of the demolition, construction, waste and indicative phasing proposals for this development.

Construction Stages

The construction stage of the Phase 1 project has commenced and will take c. 18 months to complete (the alterations proposed under this application will be included subject to a grant of permission) and the construction of the Phase 2 residential proposals, and associated development, will take c. 18 months to complete, and will happen concurrently with Phase 1, subject to a grant of permission.

The development is proposed to be constructed on the following basis:

- Strengthening works of existing foundations and columns in the car park buildings.
- Construction of a new steel frame for the apartments on top of existing buildings.
- Construction of concrete stair and lift cores.
- Pouring of metal deck floor slabs.
- Mechanical & electrical installations.
- External Walls, Cladding & Glazing.
- Architectural finishes, non-loadbearing walls, ceilings etc. associated with the above.
- Fit-out works.
- External podium landscaping & green roof finishes.

The sequence of demolition and construction is to be confirmed with the Contractor prior to commencement on site. The Contractor will be required to review and update the Construction Management Plan in accordance with the report submitted with this application.

Construction Activities

There are a number of construction activities involved in a project such as this. The activities (independent of phasing) can be divided into five general categories:

- **Structure**
Structure includes the structural frame of the proposed residential units above the Rejuvenated Frascati Centre.
- **Enclosures**
The enclosures for the building will be formed from lightweight stone, glass, and metal cladding, composite aluminium roofs, including extensive green roofs, with insulation and water proof membranes.
- **Services**
The requisite mechanical, electrical services and plant requirements will be provided including drainage and lightning protection.
- **Landscaping**
The landscaping works include communal amenity areas at roof level of the centre.

Phasing

It is intended that the rejuvenated centre will remain open for trading during the construction of the residential development, as is happening concurrently with the construction of the structural elements of the Phase 1 residential permission. The works will be phased in such a way as to allow the retail and commercial floorspace to trade.

Geotechnical Investigation

The proposed Strategic Housing Development does not involve any works below ground. The ground conditions as established from a site-specific geotechnical desk study are described in some detail in the Land and Soils and Water Chapter of the EIAR.

Predicted Impact of the Construction Stage

There are a number of aspects that will be impacted upon due to the construction of this development. This list is non-exhaustive but covers the major issues to be considered in the assessment of possible impacts of the development:

- Construction methods – duration and phasing.
- Construction traffic, parking and site working hours.
- Local traffic disruption during the upgrading of the public roadways
- Health and Safety issues.
- Noise & Vibration due to construction work.
- Air quality (principally dust)
- Construction and demolition waste management (see separate standalone report)

Construction Methods – Phasing of development

The construction methodology that will be utilised on the site will have three main attributes to minimise the impact of the construction phase.

- Phasing of construction
- Efficiency
- Minimisation of waste generated

Construction methods will use techniques that afford safe, efficient and cost effective methods of working.

In order to minimise the traffic impact associated with the construction phase, the Contractor will prepare and implement a Construction, including Traffic, Management Plan. This will ensure no adverse impacts on the operation of the local road network during the course of the construction project.

The accompanying *Construction Management Plan* addresses these issues in greater detail. It advises that the works associated with the proposed development will develop additional traffic on the public road network associated with the removal of excavated material and the delivery of new materials and concrete trucks.

It is proposed that standard construction working hours will apply. Deliveries of materials to site shall generally be between the hours of 08:00 and 18:00 Monday to Friday. There may be occasions where it is necessary to make certain deliveries outside these times, for example, where large loads are limited to road usage outside peak times.

It will be necessary for the appointed contractor to prepare a detailed construction traffic management plan to ensure the smooth operation of the local road network during the course of the construction project. It will be necessary to agree this construction traffic plan with DLRCC in advance of the project commencing, similar to what has occurred for the rejuvenation project and the Phase 1 residential permission. The management of this plan will also need to be reviewed throughout the duration of the project.

Health & Safety Issues

The development will comply with all Health & Safety Regulations during the construction of the project. Where possible potential risks will be omitted from the design so that the impact on the construction phase will be reduced.

Noise & Vibration due to Construction Work

The potential impacts associated with noise and vibration due to construction work are addressed in Chapter 10 Noise & Vibration.

Air Quality

The potential impacts associated with air quality due to construction work are addressed in Chapter 9 Air Quality and Climate.

Demolition and Construction Waste Management

Standalone Construction and Demolition Waste Management and Operational Phase Waste Management Plans prepared by AWN Consulting for the proposed development are included with this application and have informed the relevant assessments included in this EIAR. The purpose of both

reports is to ensure the best practice is followed in terms of waste and environmental management during the construction and operational phases of the proposed development, and to ensure adverse impacts on the receiving environment – including local residents - are minimised. The plans aim to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, where possible. They also provide guidance on the appropriate collection and transport of waste from the site to prevent issues associated with litter or more serious environmental pollution (such as contamination of soil and/or water).

2.7.3 Description of the Operation Stage of the Project

Pursuant to the EIA Directive an EIAR document is required to set out a description of the project processes, activities, materials and natural resources utilised; and the activities, materials and natural resources and the effects, residues and emissions anticipated by the operation of the project.

The proposed development is Strategic Housing Development at the Frascati Centre. The primary direct environmental effects will arise during the construction stage. As a result, post-construction, the operation of the proposed development is therefore relatively benign and not likely to give rise to any significant additional impacts in terms of activities, materials or natural resources used or effects, residues or emissions which are likely to have a significant impact on population and human health, biodiversity, soils, water, air, climate, or landscape.

The primary likely environmental impacts of the operation of the proposed development are fully addressed in the EIAR document; and relate to Landscape and Visual and Daylight and Sunlight Impact.

The proposed development also has the potential for cumulative, secondary and indirect impacts, particularly with respect to such topics as traffic. Each chapter within this EIAR addresses the cumulative, secondary and indirect impacts which the development may have. On the basis of the assessment carried out as part of this EIAR, it is considered that all cumulative secondary and indirect impacts are unlikely to be significant; and where appropriate, have been addressed in the content of this EIAR document.

2.7.4 Description of Changes to the Project

The *Draft Guidelines on the information to be contained in Environmental Impact Assessment Reports*, EPA, 2017 state in relation to change:

‘Very few projects remain unaltered throughout their existence. Success may bring growth; technology or market forces may cause processes or activities to alter. All projects change and- like living entities - will someday cease to function. The lifecycles of some types of projects, such as quarries, are finite and predictable. Such projects often consider their closure and decommissioning in detail from the outset, while for most projects a general indication of the nature of possible future changes may suffice. While the examination of the potential consequences of change (such as growth) does not imply permission for such growth, its identification and consideration can be an important factor in the determination of the application.

Descriptions of changes may cover:

- *Growth*
- *Decommissioning*
- *Other Changes*’.

As per the *Draft Guidelines on the information to be contained in Environmental Impact Assessment Reports*, EPA, 2017 and in the interests of proper planning and sustainable development it is important to consider the potential future growth and longer-term expansion of a proposed development in order to ensure that the geographical area in the vicinity of the proposed development has the assimilative carrying capacity to accommodate future development.

Given the permitted development on the site and the proposals included in this application, it is considered that there is limited potential for further significant expansion, however, any such proposals will be subject to separate planning application and environmental assessments. Appendix 2.1 includes details of the planning history of the subject site and adjacent developments of relevance, which have informed the cumulative impact assessments undertaken as part of this EIAR process.

The parameters for the future development of the area in the vicinity of the subject site are governed by the Dun Laoghaire Rathdown Plan 2016-2022, Section 28 Guidelines and the Blackrock LAP.

2.7.5 Description of Secondary and Off-Site Developments

No significant secondary enabling development is necessary to facilitate the proposed development. The planning application includes details of the necessary road works, which are required to facilitate this development. These works are assessed within this EIAR.

2.8 RELATED DEVELOPMENT AND CUMULATIVE IMPACTS

Each Chapter of the EIAR includes a cumulative impact assessment of the proposed development with other existing, permitted, and planning projects in the immediate area. The potential cumulative impacts primarily relate to traffic, dust, noise and other nuisances from the construction of the development, with other planned or existing projects, and each of the following EIAR chapters has regard to these in the assessment and mitigation measures proposed.

As such, with the necessary mitigation for each environmental aspect, it is anticipated that the potential cumulative impact of the proposed development in conjunction with other planned developments will be minimal.

2.9 MITIGATION MEASURES

Having regard to the construction details described above, the following mitigation measures are considered relevant to Chapter 2- Project Description and Alternatives.

PD&AE CONST 1: It will be necessary for the appointed contractor to prepare and implement a construction management plan (including traffic management) to reduce the impacts of the construction phase on local residents and ensure the local road network is not adversely affected during the course of the construction project.

PD&AE CONST 2: The appointed contractor should prepare a Construction and Demolition Waste Management Plan for the proposed development as part of their contractual responsibilities. The Waste Management Plan should meet the requirements of the Best Practice Guidelines for the Preparation of Waste Management Plans for Construction and Demolition Projects.

Each individual chapter deals with specific aspects of the proposed development and includes mitigation and monitoring measures where considered appropriate.

2.10 CONCLUSION

This chapter of the EIAR has provided a description of the development proposal and outlined the reasonable alternatives considered by the developer and design team.

In summary, the development consists of the alterations to the Phase 1 permission for 45 no. apartments (Reg. Ref.: D17A/0950 & ABP Ref.: 300745-18), from second to fourth floor level of the rejuvenated Frascati Centre. The proposed development also includes the provision of 57 no. additional apartments, as an extension of the Phase 1 permission, located above the permitted podium car park to the north west of the centre, as a Phase 2 residential development. The subject application therefore relates to a total of 102 no. residential units.

This chapter has outlined the reasonable alternatives considered as required under the 2014 EIA Directive / Irish planning legislation. This chapter has explained that the consideration of alternative locations was not considered reasonable or appropriate, however details have been provided of considerations of alternative uses and alternative designs. The reasons for the choice of the preferred design and uses proposed have been set out, with mitigation measures provided relating to the selected development proposal.

2.11 REFERENCES

- European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, August 2018
- Draft Guidelines on the information to be contained in Environmental Impact Assessment Reports, EPA, 2017
- Environmental Impact Assessment of Projects – Guidance on the Preparation of the Environmental Impact Assessment Report (2017) – European Commission
- Implementation of SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans and Programmes on the Environment Guidelines for Regional Authorities and Planning Authorities DOELG, 2004
- Authorities Transposition of 2014 EIA Directive (2014/52/EU) in the Land Use Planning and EPA Licencing Systems - Key Issues Consultation Paper, Department of Environment, Community and Local Government, 2017
- Circular letter PL 1/2017 - Advice on Administrative Provisions in Advance of Transposition (2017)
- The requirements of Part X of the Planning Acts, and Part 10 of the Planning Regulations
- National Planning Framework 2018
- Building Height Guidelines 2018
- Apartment Guidelines 2018
- Dun Laoghaire Rathdown County Development Plan 2016-2022

APPENDIX 2.1- RELEVANT PLANNING HISTORY

Frascati Centre Site

The rejuvenation of Frascati Shopping Centre was permitted under Reg. Ref.: D14A/0134. This permission is currently nearing completion on site, and is subject to modifications permitted under Reg. Ref.: D14A/0134 (which was the subject of an EIS), as amended by Reg. Ref.: D16A/0235 / ABP Ref.: PL 06D.246810, Reg. Ref.: D16A/0798, Reg. Ref.: D16A/0843, Reg. Ref.: D17A/0599 and D18A/0130.

The following is a summary of the relevant permissions implemented on site for the Rejuvenation of the Frascati Centre and which the proposed residential development will be an extension of at levels 2 to 4 (Phase 1) and above the podium car park to the north (Phase 2).

Reg. Ref.: D14A/0134- Parent Permission for the Rejuvenation of Frascati Shopping Centre

A final grant of permission was issued by Dun Laoghaire Rathdown County Council, dated the 4th of December 2014, for part demolition and extension of Frascati Shopping Centre in order to provide for its rejuvenation.

The planning application was the subject of a further information request, dated the 9th of March, which raised 13 no. items and for which a response was submitted to the Planning Authority on the 8th of September 2014. No floorspace amendments were proposed in the FI response.

The final grant of permission is subject to 23 no. conditions.

The key floorspace figures in the permitted scheme (D14A/0134) can be summarised as follows:

	Permitted
GFA of Rejuvenation Project	25,750 sq.m
GFA of Lettable Retail, Retail Services and Restaurant / Café Floorspace	16,020 sq.m
Restaurant / Café Floorspace	1,507 sq.m
Lower Ground Floor Car Park	6,158 sq.m
Car Parking No's	556
Cycle Parking No's (as per final grant)	170

Reg. Ref.: D16A/0235 & ABP Ref.: PL06D.246810- Amendment No. 1

This permission superseded two previous modification applications to the parent permission and has been amended by subsequent permissions which are discussed below.

A final grant of permission was issued by An Bord Pleanála, dated 18th of October 2016, subject to 5 no. conditions, for permission for modifications to the development permitted under Reg. Ref.: D14A/0134. This application provides a total lettable retail, retail services and restaurant / café floorspace with a GFA of 16,020 sq.m.

The key floorspace figures in the permitted scheme (D14A/0134, as amended by D16A/0235 & ABP Ref.: PL06D.246810) can be summarised as follows:

	Permitted
GFA of Rejuvenation Project	27,156 sq.m
GFA of Lettable Retail, Retail Services and Restaurant / Café Floorspace	16,020 sq.m
Restaurant / Café Floorspace	1,971 sq.m
Lower Ground Floor Car Park	6,417 sq.m
Car Parking No's	556
Cycle Parking No's (as per final grant)	170

Reg. Ref.: D16A/0798- Amendment No. 2

On the 26th of January 2017, a final grant of permission was issued by Dun Laoghaire Rathdown County Council for part off licence use (not to exceed 10%) within retail unit G26 of the permitted scheme (as amended). The final grant of permission was subject to 4 no. conditions.

Reg. Ref.: D16A/0843- Amendment No. 3

A final grant of permission was issued by Dun Laoghaire Rathdown County Council on the 23rd of February 2017 for amendments to the parent permission for the rejuvenation of the Frascati Shopping Centre. The proposed amendments resulted in an overall net reduction in the gross floorspace from 27,156 sq.m in the permitted development (as amended) to 26,489 sq.m. A reduction in the total lettable retail, retail services and restaurant / café floorspace from 16,020 sq.m to 16,002 sq.m was proposed. The restaurant / cafe floorspace was proposed to be reduced from 1,971 sq.m to 1,786 sq.m with a consequential increase in retail / retail services floorspace. No overall reduction to the permitted car parking (556 no. permitted) or cycle parking (170 no. permitted) numbers was proposed.

The final grant of permission was subject to 6 no. conditions. The Planner's Report accepted that the proposed amendments were minor in nature in the context of the overall rejuvenation scheme.

Reg. Ref.: D17A/0599- Amendment No. 4

A final grant of permission was issued by Dun Laoghaire Rathdown County Council on the 24th August 2017 for modifications to the parent permission relating to additional retail storage and internal modifications.

The key floorspace figures in the permitted scheme, as amended by Reg. Ref.: D17A/0599) can be summarised as follows:

	Permitted
GFA of Rejuvenation Project	26,848 sq.m
GFA of Lettable Retail, Retail Services and Restaurant / Café Floorspace	16,361 sq.m
Restaurant / Café Floorspace	1,786 sq.m
Lower Ground Floor Car Park	6,064 sq.m
Car Parking No's	556
Cycle Parking No's (as per final grant)	170

The final grant of permission was subject to 8 no. conditions.

Reg. Ref.: D18A/0130- Amendment No. 5

A final grant of permission was issued by Dun Laoghaire Rathdown on the 17th May 2018 for modifications to the permitted development. The development primarily involves amendments to the configuration and internal layout of the mall and units at each level, alterations to the car parking and cycle parking arrangement and minor revisions to the elevations.

The key floorspace figures in the permitted scheme, as amended by Reg. Ref.: D18A/0130) can be summarised as follows:

	Permitted
GFA of Rejuvenation Project	26,855 sq.m
GFA of Lettable Retail, Retail Services and Restaurant / Café Floorspace	16,045 sq.m
Restaurant / Café Floorspace	2,059 sq.m
Lower Ground Floor Car Park	5,991 sq.m
Car Parking No's	556
Cycle Parking No's (as per final grant)	170

Reg. Ref.: D18A/0605- Amendment No. 6

DLRCC issued a final grant on the 18th of October 2018 for modifications to the permitted development. The development primarily involves amendments to the configuration and internal layout of the mall and units at each level, alterations to the car parking and cycle parking arrangement and minor revisions to the elevations.

The key floorspace figures in the permitted scheme, as amended by Reg. Ref.: D18A/0605 can be summarised as follows;

	Permitted
GFA of Rejuvenation Project	26,852 sq.m
GFA of Lettable Retail, Retail Services and Restaurant / Café Floorspace	16,042 sq.m
Restaurant / Café Floorspace	1,932 sq.m
Lower Ground Floor Car Park	5,991 sq.m
Car Parking No's	556
Cycle Parking No's (as per final grant)	170

The Planner's Report states that "*Having regard to the Objective 'DC' zoning of the site as set out in the 2016-2022 Dun Laoghaire Rathdown County Development Plan, it is considered that the development will not detract from the amenity of the area and is consistent with the provisions of the current Development.*"

Reg. Ref.: D18A/1069 – Amendment No. 7- Change of Use of Units F04-05 and S04-05

Dun Laoghaire Rathdown County Council issued a final grant of on 9th May 2019 for a change the use of Unit F04-05 (with a GFA of c.556 sq.m) from retail to medical centre use and Unit S04-05 (with a GFA of c.567 sq.m) from retail to gym use, and all associated development.

The application was revised at FI stage to include a pharmacy use with a GFA of 92 sq.m, proposed as Unit F05, within the proposed medical centre unit.

Reg. Ref.: D19A/0196- Amendment No. 8 - Change of Use of Unit F06

Dun Laoghaire Rathdown County Council issued a final grant of on 20th of June 2019 for a change the use of a store room at lower ground floor level to retail use and Unit F06 at first floor level from retail to gym use.

Reg. Ref.: D18A/0596 – Retail Extension

Dun Laoghaire Rathdown County Council issued a final grant of permission on the 24th October 2018 for a retail extension to the rear of Frascati Shopping Centre. The proposed retail extension consists of 3 no. retail units, with an additional GFA of 211 sq.m, including an amalgamation with Unit G15 to create Unit G22, and a new double height glazed entrance to the rear of the centre. The proposal also includes 1 no. signage zone above the rear entrance, signage zones for the 3 no. units and associated alterations to the car and cycle parking layout including the removal of 7 no. car parking spaces.

	Permitted
GFA of Rejuvenation Project	27,175 sq.m
GFA of Lettable Retail, Retail Services and Restaurant / Café Floorspace	16,298 sq.m
Restaurant / Café Floorspace	2,059 Sq.m
Lower Ground Floor Car Park	5,991 sq.m
Car Parking No's	549
Cycle Parking No's (as per final grant)	170

Reg. Ref.: D18A/0798 – Signage Application

Dun Laoghaire Rathdown County Council issued a final grant of permission on the 15th November 2018 for external signage proposals subject to 4 no. conditions.

Reg. Ref.: D17A/0950 & ABP Ref.: 300745-18 – Phase 1 Residential Development

An Bord Pleanála issued an Order to grant permission on the 30th May 2019, subject to 17 no. conditions, for residential development of 45 no. apartment units over 3 no. storeys, from second to fourth floor level, over the permitted ground and first floor levels of retail / restaurant floorspace and permitted lower ground floor car park. The proposal will be an extension of the Rejuvenation Scheme permitted under Reg. Ref.: D14A/0134, as amended by Reg. Ref.: D16A/0235 / ABP Ref.: PL 06D.246810, Reg. Ref.: D16A/0798, Reg. Ref.: D16A/0843 and Reg. Ref.: D17A/0599.

The proposal also includes a first floor level podium car park, over the permitted podium car park, located at the north west of the site, which will provide 81 no. car parking spaces. The total car parking provision for the scheme as amended by this permission will be 604 no. spaces, which comprises of 51 no. spaces for the proposed residential units and 553 no. spaces for the permitted retail and restaurant floorspace.

Reg. Ref.: D19A/0438 – ESB Substation / Switchroom (Refused)

DLRCC issued a decision to refuse permission on the 15th August 2019 for the provision of a substation and associated switchroom, with a gross floor area of 31 sq.m associated landscape proposals and all ancillary works. The 1 no. reason for refusal reads as follows:

“The proposed structures and modified public realm layout represent a substandard arrangement which ill significantly detract from the aesthetics of the permitted public realm interface with Frascati Road. The proposed structures will form a visually prominent feature with the existing streetscape context and the revised landscaping layout provides a suboptimal solution which is contrary to Section 3.2 (Urban Design) of the Blackrock Local Area Plan 2015-2021 and Policy UD3 of the Dun Laoghaire Rathdown County Development Plan 2016-2022. The proposal will diminish and downgrade the provision of public space originally permitted under Reg. Ref.: D14A/0134 and the subsequent amendment applications and will significantly impact the likely utilisation of this space due to a suboptimal layout and the presence of the proposed structures on site. The proposed development would set an undesirable precedent for similar development and would, therefore, be contrary to the proper and sustainable development of the area.”

Reg. Ref.: D19A/0068 – Alterations to Anchor Unit 1

DLCC granted permission on 22nd January 2020 for the following development:

“The proposed development relates to Anchor Unit 1 (over lower ground, ground, first and second floor levels) and the adjacent mall area at ground floor level of the rejuvenated Frascati Centre, and consists of the following:

- **Lower ground floor:** Internal alterations to Anchor Unit 1 to provide a new retail unit, Anchor Unit 1A with a GFA of 2,087 sq.m, which is accessed via the existing escalators from an enlarged ground floor mall.
- **Ground floor level:** Internal alterations to Anchor Unit 1, to create 2 no. retail units; Anchor Unit 1B with a GFA of 148 sq.m, and Anchor Unit 1C with a GFA of 255 sq.m. The proposals also include a reduction in overall retail area by extending the mall area into part of existing Anchor Unit 1. The extended Mall area will provide access to the lower ground and first floor levels via the existing escalators. Associated external alterations comprising a new service door on the south eastern elevation is proposed.
- **First and second floor level:** Internal alterations to existing Anchor Unit 1 at first and second floor level to provide a new retail unit, Anchor Unit 1D with a GFA of 2,637 sq.m over two levels, to be accessed via the existing escalators from the revised ground floor mall.
- **Roof level:** Proposed new screened plant enclosure.”

The key floorspace figures in the proposed scheme can be summarised as follows:

Proposed Development	
Total Existing Gross Retail Floor Area	7,690 sq.m
Total Existing and Proposed Gross Retail Floor Area	12,840 sq.m
Total Existing and Proposed Gross Restaurant / Café	1,943 sq.m
Total Existing & Proposed Other Commercial Uses	1,270 sq.m

Total Existing and Proposed Areas	16,053 sq.m
Car Parking	549
Cycle Parking	170
Total Net Area	26,744
Total Gross Area	27,836

Reg. Ref.: D19A/0706 (ESB Substation)

DLRCC granted permission subject to 4 no. conditions, for a substation and associated switchroom, with a gross floor area of 28 sq.m, and all associated ancillary works to the south east of the rejuvenated Frascati Centre (adjacent to an existing service yard).

Reg. Ref.: D19A/0707 (ESB Substation)

DLRCC granted permission, subject to 5 no. conditions, for a substation and associated switchroom, with a gross floor area of 25 sq.m, and all ancillary works, which will replace 3 no. surface car parking spaces located to the north west of the Frascati Centre (adjacent to the internal road).

Reg. Ref.: D19A/0933 – Change of Use of Unit G06A

DLRCC granted permission on 4th March 2020 for the change of use of Unit G06A (with a GFA of c.193 sq.m) at ground floor level of the rejuvenated Frascati Centre, from Class 1 (Retail) to Class 2 (Financial / Professional Services use) and all associated development.

Reg. Ref.: D19A/0960 – Tenant Signage

DLRCC granted permission on 18th March 2020 for 5 no. tenant signs on the recessed north eastern elevation and 10 no. tenant signs (for two no. tenants) on the south eastern elevation at first floor level of the rejuvenated Frascati Centre and associated works.

Reg. Ref.: D20A/0027 – Mezzanine and Partial Change of Use of Unit G06B

A final grant of permission was issued by DLRCC on 12th June 2020 subject to 6 no. conditions to provide for a partial change of use of the unit to provide an ancillary café with an area of 41 sq.m and a kitchen/serving area of 28 sq.m, and to provide a mezzanine level for storage purposes with an area of 36 sq.m, signage and all associated works.

Reg. Ref.: - D20A/0348 - Mezzanine for Unit G05

DLRCC granted permission on 19th August 2020 for a mezzanine level for storage purposes with an area of 48 sq.m including associated works for Retail Unit G05.

Reg. Ref.: D20A/0347 - Signage Mezzanine

DLRCC granted permission on 19th August 2020 for retention permission for 2 no. tenant signs at first floor level on the north western and north eastern elevations and alterations to 1 no. tenant sign at first floor level on the north eastern elevation.

Reg. Ref.: D20A/0503 – Anchor 1, G27-G29 Reconfiguration

An application was submitted to DLRCC on the 21st July for the following development:

“The proposed development relates to Anchor Unit 1 (over lower ground, ground, first and second floor levels), Unit G27, G28 and G29 at ground floor level, the Mall area and the adjacent service yard, and consists of the following:

- *Proposed Unit D1: Amalgamation of part of Anchor Unit 1 (ground and first floor level) with Unit G27 and G28 (ground floor level) to provide a new retail Unit D1 (over ground and first floor level) with an overall GFA of 2,559 sq.m, including associated internal alterations. The existing Anchor 1 retail storage area at Level 2 will become landlord / tenant back of house area.*

- *Proposed Unit D2: Amalgamation of Unit G29 (ground floor level) with part of Anchor Unit 1 (lower ground floor level) to provide a new retail Unit D2 (over lower ground and ground floor level) with an overall GFA of 2,207 sq.m, including associated internal alterations.*
- *External Alterations: Associated external alterations including the reconfiguration / extension of Stair 7 from ground floor to first floor in the service yard on the south eastern elevation, the provision of new access doors to retail Unit D1 at ground floor level on the southwestern and south eastern elevation and new access door to the stair core to the north of Unit D2.*

The proposed development results in an overall increase in retail floorspace of 41 sq.m and includes all associated development.”

A decision is due by the 14th September 2020.

Reg. Ref.: - D20A/0576 - Mezzanine for Unit G21

An application was submitted to DLRCC on 13th August 2020 for a mezzanine level for storage purposes with an area of 82 sq.m including associated works for Unit G21. A decision is due to be made by 7th October 2020.

Previous Relevant Application on the Subject Site

A planning application for a larger scale of mixed use development on the subject site was lodged in 2005 under Reg. Ref.: D05A/0549. The development consisted of the following:

“Demolition of the entrance lobby, external canopies and the front boundary wall of the site. Extension of the existing Frascati Shopping Centre at ground, first and second floor by 4,581 sq.m increasing the overall floorspace to a total of c. 13,166 sq.m. The extension provides 17 no. new retail units, a creche facility and a restaurant unit. Provision of a multi-storey car park with a total of 702 no. spaces. Provision of 65 no. residential units at 2nd to 5th floor comprising 3 no. 1 beds, 46 no. 2 beds, 12 no. 3 beds and 4 no. duplex units. A central garden courtyard will be provided at second floor level to serve the residential units. 65 no. car parking spaces will be proposed at basement level with separate access. Proposed road works including reconfiguration of the existing site access on Frascati Road and other associated site works. An EIS was submitted with the application.”

In relation to the scale and height of the 6 no. storey development, the Planner’s Report states that *“the fourth and fifth floors are set back from the front and side edges of the building, which will decrease the perception of the overall height of the building. The architectural language also uses indents, protrusions, overhangs, vertical and horizontal emphases, all of which enable the building to be visually acceptable on the site and in the area”*. An extract of the proposed elevations under Reg. Ref.: D05A/0549 is illustrated in Figure A2.2.

Dun Laoghaire Rathdown County Council refused permission due to 1 no. reason:

“With regard to the quantum of retail and residential uses, that would have intensified the road usage in the vicinity of the site, increasing pedestrian movements crossing the N31 (between the Frascati and Blackrock Shopping Centre) leading to endangerment of public safety by reason of a traffic hazard, in the absence of a segregated safe pedestrian/mobility impaired and disabled interlink bridge between these areas”

However, the height of 6 storeys was considered acceptable by the Planning Authority.

Figure A2.2: North East and South West Elevation under Reg. Ref.: D05/0549

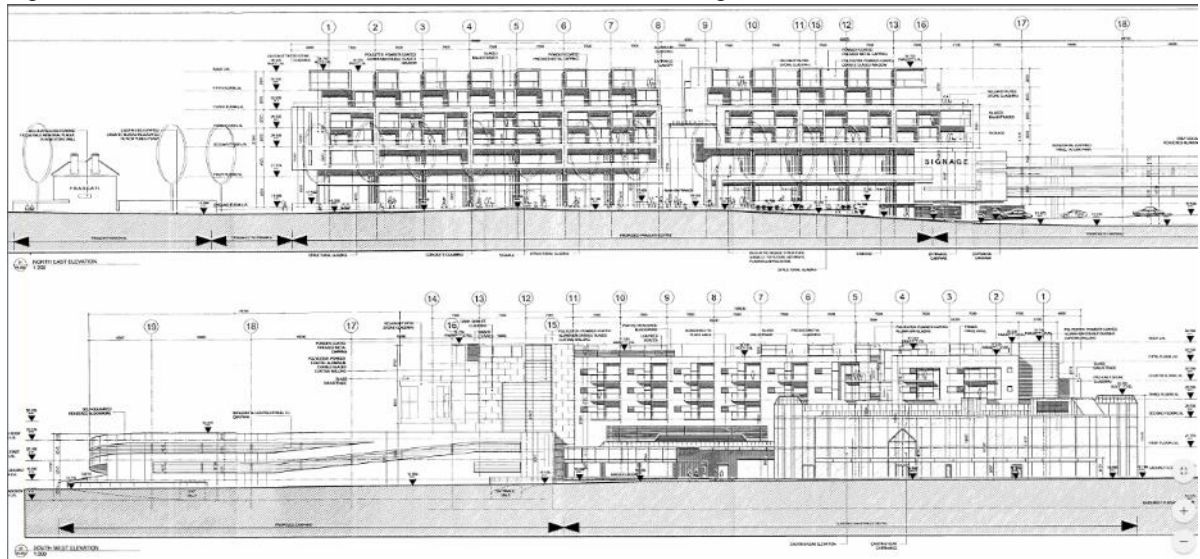


Figure A2.3: : Images of the Scheme Proposed Under Reg. Ref.: D05A/0549



Other Relevant Planning History in the Area

Enterprise House, Frascati Road

On the opposite side of the Frascati Road the former Enterprise House office site is undergoing redevelopment for a new five storey office building, as permitted under Reg. Ref.: D16A/0418 and ABP PL06D.247702, and amended under ABP Ref.: 301751-18 (DLRCC Reg. Ref.: D18A/0211). This development is largely complete.

The parent permission from November 2016 provides for the replacement of the original 1980s Enterprise House building of 3,065 sq.m with a new structure of 8,082 sq.m. The proposed commercial building has a maximum overall height of c. 21.3 metres. The final grant was subject to 11 no. conditions. Figure A2.4 below is a CGI image of the permitted scheme. An application for modifications to the permitted development was granted under ABP Ref.: 301751-18 (DLRCC Reg. Ref.: D18A/0211). This application increased the floor space of the permitted scheme by a further 438 sq.m.

Figure A2.4: CGI of the Permitted Office Block at Enterprise House



Source: www.3ddesignbureau.com

Blackrock Shopping Centre- Frascati Road

Blackrock Shopping Centre is located opposite the Frascati Centre. The centre was built in 1984 and contains 40 no. retail/commercial units including the SuperValu supermarket which is the anchor tenant.

Planning permission was granted under Reg. Ref.: D17A/0644 for the upgrade of the centre to include external and internal refurbishment and a new glazed roof. The works have recently commenced on site. The alterations include an additional storey and new front façade which increases the overall height to 15.175 metres.

The planning permission provides for the following key upgrades / alterations, as described in the project description:

- the provision of a new western entrance façade.
- internal alterations include revisions to internal shop façade of Units 7-26.

- revision to existing internal circulation including the relocation of 2 no. travellers from level -1 to lower ground floor; reduction in size of Unit 19 on level -1; revision to shop façade to Units 27-30, 34-36, 38-44, 48a-52, 80-88 on lower ground floor.
- demolition of Unit 93; removal of roof structure; part demolition of gallery area on lower ground floor; amalgamation of Units 14 and 15 on level -1.
- extension of Units 15-18 and 20 on level -1; construction of new shop fronts to Units 15-26 on level -1; amalgamation and extension of Units 39-40 on lower ground floor.
- extension of Units 30, 38-44, 51-52, 80, 82-85 and 86-88 on lower ground floor; construction of new shop entrance to Units 27-30, 34-36, 38-40, 42-44, 48a-52 and 80-88.
- provision of 2 no. kiosks to level -1.
- construction of new gallery area; extension to retail unit at upper ground floor and Change of Use of 501.7 sqm to Office/Gym/Retail/Dance Studio/ Crèche (use to be subject to first occupation); (the additional retail floor space is 266.2 sqm).
- provision of lift; extension to office at first floor; construction of new office to second floor; (the additional office floor space is 845.8 sqm).
- 1 no stairs connecting level -1 and lower ground floor; construction of internal canopy/roof structure over existing open internal area, provision of 4 no. flag poles, substation and switch (36.6 sqm) and all associated site development works.

Figure A2.5 below is a CGI image illustrating the now permitted upgrades to the western façade.

The construction of this upgrade of the Blackrock Shopping Centre is progressing on site at present.

Figure A2.5: CGI View of the Western Façade of the Upgrade Blackrock Shopping Centre



Source: www.3ddesignbureau.com