



THORNTON O'CONNOR
TOWN PLANNING

Planning Report

Planning Report

In respect of a Residential Development at

Milltown Park, Sandford Road, Dublin 6

Submitted on Behalf of
Sandford Living Limited

September 2021

1.0 INTRODUCTION

- 1.1 Application for Development
- 1.2 Description of the Proposed Development
- 1.3 Background to the Proposed Development

2.0 RATIONALE FOR THE PROPOSED RESIDENTIAL DEVELOPMENT

- 2.1 Understanding the Build-to-Rent Typology
 - 2.1.1 Recent Research Supports the Need to Provide an Alternative Housing Model
- 2.2 Responding to Policy Set out in the *National Planning Framework (NPF), Sustainable Urban Housing: Design Standards for New Apartments* (December 2020) and the *Dublin City Development Plan 2016 – 2022* Relating to Demographic Changes
 - 2.2.1 Having Regard to the Central and/or Accessible Location of the Subject Site as Defined in the *Apartment Guidelines 2020*, the Site is Eminently Suitable for the Proposed Residential Development
- 2.3 There is an Acute Shortage of Rental Units Available in the Local Area
- 2.4 Rental and Sale Price of Units in Dublin 6
- 2.5 Demographics of the Area

3.0 SITE LOCATION, DESCRIPTION AND CONTEXT

- 3.1 Site Location and Description
- 3.2 Details of the Existing Building Range
- 3.3 Site Context
 - 3.3.1 Nearby Neighbourhood Centres
 - 3.3.2 Social and Community Audit
- 3.4 Accessibility
 - 3.4.1 Introduction
 - 3.4.2 Luas Light Rail
 - 3.4.3 Existing Bus Services
 - 3.4.4 A Large Variety of Business Districts and Employment Locations Can be Easily Accessed By Public Transport and Many Are Also Within Easy Cycling and Walking Distance of the Subject Site
 - 3.4.5 Improvements to Public Transport
- 3.5 Summary

4.0 PLANNING HISTORY

- 4.1 Overview of Planning Applications at the Subject Site
 - 4.1.1 DCC Reg. Ref. 3366/20 – Separation Works
 - 4.1.2 DCC Reg. Ref. 3044/13 / ABP Ref. PL29S.242764 – ‘Temporary School Accommodation’
- 4.2 Applications to Extend the Duration of Development Permitted Under DCC Reg. Ref. 3044/13 / ABP Ref. PL29S.242764
 - 4.2.1 DCC Reg. Ref. 2673/16 / ABP Ref. PL29S.246869 – ‘Extension of Duration’
 - 4.2.2 DCC Reg. Ref. 3913/18 – ‘Further Extension of Duration’
- 4.3 Application Pertaining to Boundary Wall to the South (Redline Overlaps with the Subject Redline Boundary)
- 4.4 Other Planning Applications on the Wider Jesuit Lands
- 4.5 Relevant Planning Applications on Lands Zoned Z15
 - 4.5.1 DCC Reg. Ref. / ABP Ref. PL29S.234927– ‘Marianella, Rathgar-Parent Permission’

- 4.5.2 ABP Ref. PL29S.303133 - 'Marianella, Rathgar - Apartments Application'
- 4.5.3 DCC Reg. Ref. 2991/15 / ABP Ref. PL29N.245745 – 'St Joseph's, Grace Park Road, Drumcondra, Dublin 9'
- 4.5.4 DCC Reg. Ref. 4105/15 / ABP Ref. PL29S.246430 – 'Carmelite Convent, Griffith Avenue, Gracepark Road, Dublin 9'
- 4.6 Recent Application for Increased Height on a Corner Site in the Vicinity
- 4.7 Other Planning Applications in the Vicinity Granted or Seeking Permission
- 4.8 Analysis of Planning History

5.0 PROPOSED DEVELOPMENT IN DETAIL

- 5.1 Detailed Description of the Site Area
- 5.2 Description of the Proposed Development
- 5.3 Key Site Statistics
- 5.4 Height and Massing
- 5.4.1 Daylight/Sunlight Analysis
- 5.5 Density
- 5.6 Design Rationale
- 5.6.1 Materials
- 5.6.2 Communal Internal Amenity Space
- 5.6.3 Creche
- 5.6.4 Landscape Strategy
- 5.7 Trees
- 5.8 Roadworks
- 5.9 Drainage Works
- 5.10 Summary of Proposed Development

6.0 PLANNING POLICY CONTEXT

- 6.1 Relevant Development Management Standards
- 6.2 National Policy
- 6.2.1 National Planning Framework – Project Ireland 2040
- 6.2.2 *Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)*
- 6.2.3 *Sustainable Urban Housing Design Standards for New Apartments, Guidelines for Planning Authorities, December 2020 (Apartment Guidelines)*
- 6.3 *Dublin City Development Plan 2016-2022*
- 6.3.1 Zoning
- 6.3.2 Architectural Conservation Area and Protected Structures
- 6.3.3 Plot Ratio
- 6.3.4 Site Coverage
- 6.3.5 Building Height
- 6.3.6 Urban Design
- 6.3.7 Variation of Accommodation Types
- 6.4 Minimum Residential Development Standards
- 6.5 Public Open Space
- 6.6 Communal Open Space
- 6.7 Private Open Space
- 6.8 Dual Aspect
- 6.9 Car Parking



6.10 Bicycle Parking

6.11 Conclusion

7.0 CONCLUSION

An Bord Pleanála
No. 64 Marlborough Street
Dublin 1
D01 V902
Co. Dublin

Monday, 6th September 2021

Dear Sir/Madam

RE: STRATEGIC HOUSING DEVELOPMENT FOR THE DEMOLITION OF A NUMBER OF EXISTING VACANT STRUCTURES ON SITE (MILLTOWN PARK HOUSE, MILLTOWN PARK HOUSE REAR EXTENSION, THE FINLAY WING, THE ARCHIVE, THE LINK BUILDING BETWEEN TABOR HOUSE AND MILLTOWN PARK HOUSE REAR EXTENSION TO THE FRONT OF THE CHAPEL, AND A PORTION OF THE 'RED BRICK LINK BUILDING' (SINGLE STOREY OVER BASEMENT) TOWARDS THE SOUTH-WESTERN BOUNDARY), THE REFURBISHMENT AND REUSE OF TABOR HOUSE AND THE CHAPEL BUILDING AND THE CONSTRUCTION OF 671 NO. RESIDENTIAL DWELLINGS COMPRISING 604 NO. BUILD-TO-RENT UNITS AND 67 NO. BUILD-TO-SELL UNITS ON LANDS LOCATED AT MILLTOWN PARK, SANDFORD ROAD, DUBLIN 6.

1.0 INTRODUCTION

1.1 Application for Development

The subject planning application falls within the definition of Strategic Housing Development as defined in Section 3 of the *Planning and Development (Housing) and Residential Tenancies Act 2016, as amended* which is—
fr

'(a) the development of 100 or more houses on land zoned for residential use or for a mixture of residential and other uses.'

Section 3 of the *Planning and Development (Housing) and Residential Tenancies Act 2016* (amended July 2018) further states that Strategic Housing Developments:

'may include other uses on the land, the zoning of which facilitates such use, but only if—

- (i) the cumulative gross floor area of the houses or student accommodation units, or both, as the case may be, comprises not less than 85 per cent, or such other percentage as may be prescribed, of the gross floor space of the proposed development or the number of houses or proposed bed spaces within student accommodation to which the proposed alteration of a planning permission so granted relates, and*

- (ii) *the other uses cumulatively do not exceed—*
(I) 15 square metres gross floor space for each house or 7.5 square metres gross floor space for each bed space in student accommodation, or both, as the case may be, in the proposed development or to which the proposed alteration of a planning permission so granted relates, subject to a maximum of 4,500 square metres gross floor space for such other uses in any development, or
(II) such other area as may be prescribed, by reference to the number of houses or bed spaces in student accommodation within the proposed development or to which the proposed alteration of a planning permission so granted relates, which other area shall be subject to such other maximum area in the development as may be prescribed.'

The subject planning application proposes 671 No. residential units with ancillary residents' amenity space/facilities and a creche at the subject lands and thus must be accepted as a Strategic Housing Development application. Furthermore, the non-residential element of the proposed scheme (400 sq m) represents 3.8% of the total gross floor space of the development and thus must be accepted as a Strategic Housing Development application.

The application for permission has been prepared by a multi-disciplinary team on behalf of Sandford Living Limited as summarised below. For full details of the list of inputs into the application, please see the appendices to the planning application form enclosed.

Company Name & Address	Documents Prepared
Thornton O'Connor Town Planning No. 1 Kilmacud Road, Dundrum, Dublin 14	→ Planning Report → Statement of Consistency → Material Contravention Statement → Response to ABP Opinion → Outline CEMP → EIAR Input
O'Mahony Pike Architects ("OMP") The Chapel, Mount Saint Annes, Milltown, Dublin	→ Drawings → Design Statement → Housing Quality Assessment → Schedule of Accommodation → EIAR Input: Chapter 4 (Examination of Alternatives)
DBFL Consulting Engineers ("DBFL") Ormond House, Ormond Quay Upper, Inns Quay, Dublin 7	→ Infrastructure Design Report → Traffic and Transport Report → DMURS Statement of Consistency → Flood Risk Assessment → Basement Impact Assessment → Mobility Management Plan → Parking Strategy → Road Safety Audit (Bruton Consulting Engineers) → Preliminary Construction Management Plan → Drainage Drawings → EIAR Input:

	<ul style="list-style-type: none"> → Chapter 4 (Examination of Alternatives); → Chapter 10 (Land, Soils and Geology); → Chapter 11 (Water-Hydrology); → Chapter 15 (Transportation); and → Chapter 16 (Material Assets – Site Services)
<p>Molloy and Associates Conservation Architects</p> <p>Marlay, Proby Square, Blackrock, Co. Dublin</p>	<ul style="list-style-type: none"> → EIAR Chapter 7-Architectural Heritage
<p>Cameo and Partners Design Studio</p> <p>Nos. 1-2 Hatfields, South Bank, London, SE1 9PG</p>	<ul style="list-style-type: none"> → Landscape Drawings and Reports
<p>O'Connor Sutton Cronin Consulting Engineers</p> <p>No. 9 Prussia Street, Stoneybatter, Dublin 7</p>	<ul style="list-style-type: none"> → Energy & Sustainability Statement → EIAR Chapter 17 (Microclimate – Wind)
<p>3D Design Bureau</p> <p>No. 65 Rock Road, Intake, Blackrock, Co. Dublin</p>	<ul style="list-style-type: none"> → Daylight/Sunlight Assessment → Verified Views → CGIs
<p>JBA Consulting</p> <p>Unit 8, Block 66o, Greenogue Business Plaza, Greenogue Business Park, Rathcoole, Dublin, D24 YN81</p>	<ul style="list-style-type: none"> → Appropriate Assessment Screening → EIAR Chapter 8 - Biodiversity

<p>Invasive Plant Solutions</p> <p>The Stationhouse, Station Road, Dundrum, Co. Tipperary, Ireland</p>	<p>→ Invasive Alien Plant Species Site Assessment Report – EIAR Appendix</p>
<p>Modelworks</p> <p>The Old Courtyard, Newtownpark Ave, Blackrock, Co. Dublin, A94 YD61</p>	<p>→ EIAR Chapter 9 – Landscape and Visual Assessment</p>
<p>CMK Horticulture and Arboriculture Ltd</p> <p>Drumone, Oldcastle, Co. Meath, A82 FK79</p>	<p>→ Tree Survey → Arboricultural Assessment → Tree Constraints/Protection Plan</p>
<p>AWN Consulting</p> <p>The Tecpro Building, Clonshaugh Business & Technology Park, Dublin 17</p>	<p>→ EIAR Input: → Chapter 12 (Air Quality and Climate); → Chapter 13 (Noise and Vibration); → Chapter 14 (Material Assets –Waste Management [including Construction and Demolition Waste Management Plan and Operational Waste Management Plan]) → Hydrological & Hydrogeological Qualitative Risk Assessment (EIAR Appendix)</p>
<p>Archer Heritage Planning Limited</p> <p>Unit 8, BEAT Centre, Stephenstown, Balbriggan, Co. Dublin</p>	<p>→ EIAR Chapter 6 – Archaeological and Cultural Heritage</p>
<p>Pritchard Themis</p> <p>No. 38 Bocking Street London</p>	<p>→ Lighting Report and Plans</p>

E8 3FP	
KPMG Future Analytics Consulting No. 1 Stokes Place, Saint Stephen's Green, Dublin 2	→ Social Infrastructure Audit → Childcare Demand Assessment
Independent Site Management No. 83 Harcourt Street Dublin 2	→ Telecommunications Report
Maurice Johnson & Partners Fire Safety Engineering & Access Consultants The Anchorage, Charlotte Quay, Dublin 4	→ Preliminary Access & Use Strategy
Aramark Property St Stephens Green House, Earlsfort Terrace, Dublin 2	→ Lifecycle Report → Operation Plan
Enviroguide Consulting Unit 3D, Core C, Block 71, The Plaza, Park West, Dublin 12	→ EIAR Chapter 18 - Risk Management

1.2 Description of the Proposed Development

The subject lands have been purchased by Sandford Living Limited with the intention of developing a high-quality mixed-tenure residential development and a creche along with an extensive range of public open spaces that will be available to the wider community. In summary, the development proposes the demolition of a number of existing vacant structures (Milltown Park House, Milltown Park House Rear Extension, the Finlay Wing, the Archive, the link building between Tabor House and Milltown Park House rear extension to the front of the Chapel, and 36.4 sq m of the 'red brick link building' towards the south-western boundary), the refurbishment and reuse of Tabor House and the Chapel and the construction of 671 No. residential units (604 No. Build-to-Rent and 67 No. Build-to-Sell units). The development also comprises residential support facilities and amenities, public and communal open spaces, in addition to a creche.

The full description as per the Statutory Notice is provided below:

Sandford Living Limited intend to apply to An Bord Pleanála for permission for a strategic housing development at this c. 4.26 hectare site at Milltown Park, Sandford Road, Dublin 6, Do6 VgK7. Works are also proposed on Milltown Road and Sandford Road to facilitate access to the development including improvements to pedestrian facilities on an area of c. 0.16 hectares. The development's surface water drainage network shall discharge from the site via a proposed 300mm diameter pipe along Milltown Road through the junction of Milltown Road / Sandford Road prior to outfalling to the existing drainage network on Eglinton Road (approximately 200 metres from the Sandford Road / Eglinton Road junction), with these works incorporating an area of c. 0.32 hectares. The development site area, road works and drainage works areas will provide a total application site area of c. 4.74 hectares.

The development will principally consist of: the demolition of c. 4,883.9 sq m of existing structures on site including Milltown Park House (880 sq m); Milltown Park House Rear Extension (2,031 sq m); the Finlay Wing (622 sq m); the Archive (1,240 sq m); the link building between Tabor House and Milltown Park House rear extension to the front of the Chapel (74.5 sq m); and 36.4 sq m of the 'red brick link building' (single storey over basement) towards the south-western boundary; the refurbishment and reuse of Tabor House (1,575 sq m) and the Chapel (768 sq m), and the provision of a single storey glass entrance lobby to the front and side of the Chapel; and the provision of a 671 No. unit residential development comprising 604 No. Build-to-Rent apartment and duplex units (88 No. studios, 262 No. one bed units, 242 No. two bed units and 12 No. three bed units) and 67 No. Build-to-Sell apartment and duplex units (11 No. studios, 9 No. one bed units, 32 No. two bed units and 15 No. three bed units).

Block A1 will range in height from part 5 No. storeys to part 10 No. storeys and will comprise 94 No. Build-to-Rent apartments; Block A2 will range in height from part 6 No. storeys to part 8 No. storeys (including part double height at ground floor level) and will comprise 140 No. Build-to-Rent apartments and duplex units; Block B will range in height from part 3 No. to part 7 No. storeys and will comprise 91 No. Build-to-Rent apartments; Block C will range in height from part 2 No. storeys to part 8 No. storeys (including part double height at ground floor level) and will comprise 163 No. Build-to-Rent apartments; Block D will range in height from 3 No. storeys to 5 No. storeys and will comprise 39 No. Build-to-Sell apartments; Block E will be 3 No. storeys in height and will comprise 28 No. Build-to-Sell duplex units and apartments; Block F will range in height from 5 No. storeys to part 7 No. storeys and will comprise 92 No. Build-to-Rent apartments; and the refurbished Tabor House (4 No. storeys including lower ground floor level) will comprise 24 No. Build-to-Rent apartments.

The development also includes a creche within Block F (400 sq m) with outdoor play area; and the provision of communal internal amenities (c. 1,248.8 sq m) and facilities (c. 158.3 sq m) throughout the residential blocks, Tabor House and the converted Chapel building including co-working space, gym, lounges, reading rooms, games room, multi-purpose space, concierge, mail rooms and staff facilities.

The proposed works also include a new 2.4 metre high boundary wall across the site from east to west (towards the southern boundary) requiring the demolition of a portion of the red brick link building that lies within the subject site towards the south-western boundary (36.4 sq m) and the making good of the façade at the boundary. The existing Link Building is the subject of a separate application for permission (DCC Reg. Ref. No. 3866/20) that includes a request for permission to demolish that Link Building, including the part of the building on the lands the subject of this application for SHD permission. If that application is granted and first implemented, no demolition works to the Link Building will be required under this application

for SHD permission. If that application is refused permission or not first implemented, permission is here sought to demolish only that part of the Link Building now existing on the lands the subject of this application for permission and to make good the balance at the red line with a blank wall.

The development also provides a new access from Milltown Road (which will be the principal vehicular entrance to the site) in addition to utilising and upgrading the existing access from Sandford Road as a secondary access principally for deliveries, emergencies and taxis; new pedestrian access points; pedestrian/bicycle connections through the site; 344 No. car parking spaces (295 No. at basement level and 49 No. at surface level) which includes 18 No. mobility impaired spaces, 10 No. car share spaces, 4 No. collection/drop-off spaces and 2 No. taxi spaces; bicycle parking; 14 No. motorcycle spaces; bin storage; boundary treatments; private balconies and terraces facing all directions; external gantry access in sections of Blocks A1, A2 and C; hard and soft landscaping including public open space and communal open space (including upper level communal terraces in Block A1, Block B and Block C which will face all directions); sedum roofs; PV panels; substations; lighting; plant; lift cores; and all other associated site works above and below ground. The proposed development has a gross floor space of c. 54,871 sq m above ground level over a partial basement (under part of Block A1 and under Blocks A2, B and C) measuring c. 10,607 sq m, which includes parking spaces, bin storage, bike storage and plant

1.3 Background to the Proposed Development

Up until 2019, the existing buildings and lands at the application site were formally utilised by the Jesuit Community for institutional purposes. The institutional operations on the site ceased permanently in 2015 and the property was vacated by the Jesuit order in 2019. For more than 160 years, the role of the Milltown Park community has been the formation of Jesuits, and since the 1960s, instruction of a dozen other religious congregations in Theological and Pastoral Ministry. Since the 1960s these studies were expanded to include the education of lay people as part of a move towards greater lay involvement in Church Ministry. Both these areas have experienced a dramatic decline and falling vocations leading the Jesuit Society to close these facilities and seek other options for training of priests.

As a result of this decline experienced by the Jesuits and departure of the clerical students from the application site, the site was sold to the Applicant in 2019 and comprises a range of former institutional buildings and large unutilised green spaces which have become surplus to the Jesuit Community's requirements and are no longer required for the purposes of its function and mission. This has been confirmed in a letter received from the Jesuits enclosed as Appendix A of the Planning Report.

The letter confirms that the buildings are now vacant and have become impossible to maintain by the Jesuit Community which has left the site redundant and ultimately lead to its sale to the Applicant, in order to provide a sustainable use of the lands. The Jesuits have retained Milltown Park Community House and Cherryfield Lodge Nursing located on adjoining lands, which are entirely adequate for their future needs and retains their Institutional requirements on the lands.

When acquiring the site, the Applicant duly considered the zoning objective pertaining to the lands which are zoned Objective Z15 'Institutional and Community' in the *Dublin City Development Plan 2016 – 2022*, where 25% public open space is required, beyond the standard 10% typically required for a residential development on lands within the

administrative area of Dublin City Council (“DCC”). In addressing the particular characteristics of the site, namely a large volume of vacant institutional buildings, a key requirement early in the design process was to determine which buildings could be functionally retained and reused within the development. In addition, the requirement for 25% public open space has been considered in line with the Z15 zoning objective pertaining to the lands. In this regard, it is important to note that the lands have always been walled and gated and in private use by the Jesuit Community and closed off from the public, and will now be opened up for the first time to the public. The public have never enjoyed any right of access to these privately owned lands.

The development layout was framed around these key design considerations and thus the residential development now proposed has utilised the remainder of the site to provide a range of residential units and tenures as detailed extensively throughout this report and accompanying documentation.

Having regard to the key design considerations above, Tabor House and the Chapel will be reused and refurbished within the development and the development significantly exceeds the requirement to provide 25% public open space as required by the Z15 zoning objective. Please see images below prepared by Cameo and Partners Design Studio which demonstrates the large quantum of public open space provided within the proposed development (34.9% of the site area). Full details in relation to the proposed development and scheme layout have been set out in the Planning Report prepared by Thornton O’Connor Town Planning, the OMP Design Statement and the Landscape Report prepared by Cameo and Partners Design Studio.



Figure 1.1:

Ground Floor Illustrative Landscape Masterplan

(Source:

Cameo and Partners Design Studio, 2021)

1.4 Guidelines and Plans

This Planning Report principally includes reference to the following Guidelines and Plans:

- *Project Ireland 2040 – The National Planning Framework (“NPF”);*
- *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018) (“Building Height Guidelines”);*
- *Sustainable Urban Housing: Design Standards for New Apartments-Guidelines for Planning Authorities (December 2020) (“Apartment Guidelines, 2020”);*
- *Action Plan for Housing and Homelessness, Rebuilding Ireland (“Rebuilding Ireland”); and*
- *Dublin City Council Development Plan 2016 – 2022 (“Development Plan”).*

2.0 RATIONALE FOR THE PROPOSED RESIDENTIAL DEVELOPMENT

We have set out in Section 1.3 that the key tenet at the outset of the development was retaining any existing buildings that could be functionally re-used and providing (and exceeding) the quantum of public open space required to comply with the site's Z15 zoning objective. In the context of the residential element of the scheme, we set out below a rationale for the nature of the mixed-tenure residential element proposed.

The subject site has recently been purchased by the Applicant in 2019 with the intention of developing a high-quality mixed tenure residential scheme including a mix of Build-to-Rent Build-to-Sell units on a key accessible site adjacent to frequent public transport, employment locations, services and facilities in Dublin. We consider that the proposed development is appropriate having regard to recent national policy, which requires the densification of sites in core urban locations such as the subject site. This section will set out a rationale for providing a predominately Build-to-Rent typology at the subject site while also providing a smaller quantum of Build-to-Sell units to accommodate a variety of housing types and tenures for this area of Dublin City.

We have also reviewed the most recent Economic and Social Research Institute (ESRI) *Quarterly Economic Commentary Summer 2021*¹ which notes:

'However, with restrictions easing, both foreign and domestic sources of growth are likely to contribute considerably to the performance of the economy for the rest of the year. The export sector is set to perform particularly strongly in 2021, while domestic demand is expected to increase by 6.4 per cent in 2021 and 7.3 per cent in 2022. This means the economy is set to register substantial growth of 11.1 per cent in the present year. In 2022, the economy is forecast to increase by 6.9 per cent.'

While the pace of growth expected this year and next is encouraging, it is worth noting that COVID-19 has had a significant adverse impact on the domestic Irish economy. In a Box to the Commentary, Bergin, Garcia-Rodriguez and McQuinn estimate that the cost in output terms to the economy in 2020 and 2021 was almost €24 billion, when compared with where the economy would have been if COVID-19 had not occurred.

Additionally, COVID-19 is also likely to have other significant long-lasting impacts on the Irish economy and society. In particular, the impact on residential construction means that the imbalance between housing supply and demand is greater now than it was at the start of the pandemic. In a paper to the Commentary, McQuinn (2021) addresses how Government policy may address these issues. The paper suggests that a modest increase in Government borrowing is sustainable over the medium term. The increase in funds provided under such a policy could facilitate extra investment in key infrastructure in the economy such as the provision of housing.' [Our Emphasis]

We note that the provision of 671 No. units at the subject lands will greatly contribute to the housing supply of the area.

¹ [Quarterly Economic Commentary, Summer 2021 | ESRI](#)

2.1 Understanding the Build-to-Rent Typology

Build-to-Rent is a relatively new form of housing development and consist of purpose-built residential units which are professionally managed and maintained and include communal spaces, which will contribute to the residential amenity and sustainable development of apartment stock.

It is well documented in the media there is a critical shortage of affordable housing in the country. The Build-to-Rent typology was introduced in the *Sustainable Urban Housing Design Standards for New Apartments* (December 2020) ("*Apartment Guidelines, 2020*") and seeks to directly address these issues.

The *Apartment Guidelines, 2020* note at Section 5.2 that:

'To date rental only developments at scale in Ireland have been limited. 'Build-to-Rent' (or BTR) can be defined as:

Purpose-built residential accommodation and associated amenities built specifically for long-term rental that is managed and serviced in an institutional manner by an institutional landlord.'

The *Apartment Guidelines, 2020* further note at Section 5.1 that Build-to-Rent developments:

'can provide a viable long term housing solution to households where home-ownership may not be a priority, such people starting out on their careers and who frequently move between countries in the pursuance of career and skills development in the modern knowledge-based economy.'

In its analysis of evolving housing need, the *Apartment Guidelines, 2020* recognise the changing nature of the underlying demographic and demand factors on the existing housing supply. The policy outlines the underlying shift in demand pressures as follows in Section 2.7:

'The 2016 Census indicates that 1-2 person households now comprise a majority of households and this trend is set continue, yet Ireland has only one-quarter the EU average of apartments as a proportion of housing stock. Dublin as a whole has approximately one-third the rate of apartments as comparable cities in Europe, with which it competes for investment and talent to secure continued growth and prosperity.' [Our Emphasis]

As part of housing need, economic pressure and EU and international competitiveness, Ireland's housing stock needs to adapt to changing circumstances. Family homes are increasingly unaffordable for first time buyers, and more transient high skilled employees are becoming priced out of our meagre rental supply. The *Apartment Guidelines, 2020* note the following at Section 2.12:

*'... the trend whereby jobs have been increasingly located in and around Ireland's cities larger towns, and notwithstanding improvements in technology and the availability of broadband, it is likely to continue. While the availability of a range of employment is one of the reasons that skilled migrants are more likely to seek to locate in urban areas, **this is also dependent on the availability of a choice of suitable accommodation.**'* [Our Emphasis]

In addition, we have been advised that the Applicant are operating developers whose intention is to hold the assets long term and as such have designed them to international operating standards. Representatives of the Applicant has travelled extensively looking at rental projects in other countries.

2.1.1 Recent Research Supports the Need to Provide an Alternative Housing Model

Deloitte published its pre-budget analysis (2019)² and states that *'the decline in the number of residential landlords is compounding supply issues in our property market'* but notes that new residential policies aim to address this issue.

There is a change in the nature of housing demand, not just from a market perspective, but from a demographic shift. We note the following comments from the research completed by Knight Frank in 2019 on the private rental sector entitled *'The Dublin PRS Report'*³ which states:

'There has been a cultural shift in attitudes towards renting in recognition of the flexibility it offers, with this demand particularly strong from the young, internationally mobile professionals working in the tech and finance sectors.'

The *Dublin PRS Report* also notes the demographic shifts underlying these trends:

'Ireland is experiencing a population boom, providing a natural long-term source of demand for housing. Over the period 1991-2016 the population grew by 34% compared to a growth rate of 7% for the EU as a whole.'

This population growth has particularly concentrated itself on Ireland's urban centres, principally in the Greater Dublin Region. Current projections anticipate this growth to continue. The *Dublin PRS Report* notes:

'...Dublin is undergoing a population boom with the population set to increase by 292,400 – or 21.7% between 2016 and 2040 according to the ERSI.'

Multiple factors are contributing to this, such as fertility, inward migration, a mobile workforce and returning emigrants of varying ages. Ireland is currently bucking the trend of current EU member states, which positively contributes towards our economic competitiveness and diversity.

'A high fertility rate in conjunction with low mortality rates has resulted in Irelands natural population growth being the highest in Europe at 6.6% in 2017, far ahead of the second highest of Cyprus which had an increase of 3.8%.'

The high growth rate is set to continue with Eurostat projecting that the population of Ireland will increase by 28.2% to 2080, compared to just 0.6% for the EU 28. [Sic]' (Dublin PRS Report)

² <https://www2.deloitte.com/ie/en/pages/tax/articles/pre-budget-real-estate.html>

³ <https://content.knightfrank.com/research/1601/documents/en/the-dublin-prs-report-2018-5830.pdf>

However, with the pressures on housing supply and the rental sectors, there is an increasing gap between affordability and appropriate living standards, when it comes to residential supply. To continue to balance the needs of a growing population and maintain sustainable planning practices we must be cognisant of the evolving nature of the rental sector. In their 2019 pre-budget observations Deloitte outlined the current climate as follows:

'With FDI remaining crucial to Ireland Inc., it is imperative that action is taken to improve the supply of available stock to ensure Ireland does not lose out due to an inability to house new workers.'

The Knight Frank research on the Private Rental Sector (*The Dublin PRS Report*) also lays out how the rental market is adapting to provide and service the new housing typology of Build-to-Rent.

'The transition from a buy-to-rent to a build-to-rent market will be driven by the drying-up of standing investment opportunities coupled with the positive market fundamentals that BTR investors seek.'

The publishing of the *National Planning Framework (Ireland 2040)* ("NPF"), the results for Census 2016 and the *Urban Development and Building Height Guidelines, December 2018* ("*Building Height Guidelines*") and *Action Plan for Housing and Homelessness, Rebuilding Ireland* ("*Rebuilding Ireland*"); have changed the perspective of how planning and housing delivery must respond to demand. The NPF estimates a need to house one million new people by 2040, focusing development on the top 5 cities, some 50% of that development within Dublin. This new development is to be targeted at brownfield and infill sites first. Sustainable and accessible sites near transport and employment have priority, and new mechanisms such as Build-to-Rent apartments are a means of achieving this densification.

The provision of Build-to-Rent units can make a significant contribution to the required increase in housing supply nationally, identified by *Rebuilding Ireland*, and the scale of increased urban housing provision envisaged by the NPF.

To meet current housing demands and contribute to consolidated sustainable growth, Build-to-Rent schemes offer a maintained and high standard accommodation with the security of a management company. Specific Planning Policy Requirement 7 as set out in the *Apartment Guidelines, 2020* notes that Build-to-Rent developments must remain as a managed accommodation for 15 No. years, and that no individual units are sold or rented separately for this period of time.

2.2 Responding to Policy Set out in the *National Planning Framework* ("NPF"), *Sustainable Urban Housing: Design Standards for New Apartments* (December 2020) ("*Apartment Guidelines, 2020*") and the *Dublin City Development Plan 2016 – 2022* ("*Development Plan*") Relating to Demographic Changes

Section 4.5 of the NPF promotes the compact growth of urban areas and acknowledges that Ireland's housing crisis has resulted in:

'a time when many people, including those on average incomes, wish to live close to where they work and the services and amenities necessary to enjoy a good quality of life, they struggle to do so because the urban housing market has become constrained.'

The NPF further calculates in Section 6.6 that:

'between 2018 and 2040, an average output of at least 25,000 new homes will need to be provided in Ireland every year to meet the needs for well-located and affordable housing, with increasing demand to cater for one and two-person households.'

In addition, it is noted that Section 5.3 of the *Dublin City Development Plan 2016 – 2022* states that:

'It is important that the city has housing that is affordable and attractive to all who want to live in the city.'

It is our professional opinion that as will be demonstrated in this Planning Report, the subject lands are eminently suitable to provide higher density residential accommodation in proximity to high frequency public transport, employment locations, services and facilities, which can meet the housing needs of a greater number of persons and will address the acute housing shortage and the significant demand that exists in Dublin.

2.2.1 Having Regard to the Central and/or Accessible Location of the Subject Site as Defined in the *Apartment Guidelines 2020*, the Site is Eminently Suitable for the Proposed Residential Development

The *Sustainable Urban Housing Design Standards for New Apartments (December 2020)* ("*Apartment Guidelines 2020*") identifies the location of the application site as an 'Central and/or Accessible Urban Location' which are defined as follows:

'Such locations are generally suitable for small- to large-scale (will vary subject to location) and higher density development (will also vary), that may wholly comprise apartments, including:

- *Sites within walking distance (i.e. up to 15 minutes or 1,000 – 1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions;*
- *Sites within reasonable walking distance (i.e. up to 10 minutes or 800 – 1,000 m) to/from high capacity urban public transport stops (such as DART or Luas); and*
- *Sites within easy walking distance (i.e. up to 5 minutes or 400 – 500m) to/from high frequency (i.e. min 10 minute peak hour frequency) urban bus services.'*

The accessibility of the subject site is detailed extensively in Section 3.4. However, in summary, a response to each category will be outlined below:

1. **Sites within walking distance (i.e. up to 15 minutes *or* 1,000 – 1,500m), of *principal city centres, or significant employment locations, that may include hospitals and third-level institutions;***

- The site is located within c. 350 metres/c. 6 minutes walking distance of Clonskeagh Hospital, c. 1.4 km/c. 17 minutes walking distance of The Royal Hospital Donnybrook and c. 1.5 km/c. 19 minutes walking distance of University College Dublin.
- Belfield Office Park/Beech Hill Office Campus is located within c. 1 km/ c. 13 minutes walking distance which contains employers such as Environmental Protection Agency (EPA), Circle K Head Office, McDonalds Restaurants of Ireland Head Office, Smurfit Kappa, KSN Construction Consultants and Project Managers and PeoplePoint HRSSC (Irish Civil Service);
- Ballsbridge is within c. 1.5 km/c. 20 minutes walking distance which contains the RDS, Zurich, Facebook⁴, Goodbody, Eirgrid, IBM, Labour Relations Commission, and in addition to many hotels, bars and restaurants;
- The site is located in proximity to many neighbourhood and district centres such as Donnybrook which contains the RTE Studios (c. 1.4 km/c. 17 minutes walking distance) and the Dublin Bus Depot (c. 750 metres/c. 9 minutes walking distance) and Rathmines which contains the Swan Shopping Centre (c. 1.7 km/c. 22 minutes walking distance-just outside of the 1.5 km/15 minute range outlined above but it is worth noting its proximity) and the Central Statistics Office (c. 2 km/c. 25 minutes walking distance-just outside of the 1.5 km/15 minute range outlined above but it is worth noting its proximity); and
- The Canal which defines the City Centre, is located within c. 1.6 km/c. 25 minutes walking distance of the subject site (just outside of the 1.5km/15 minute range outlined above but it is worth noting the proximity of the Canal) which contains significant employers such as Zendesk EMEA Headquarters, BOI Group HQ, Amazon Ireland⁵, Department of Communications, Marsh Ireland Ltd and AIB Burlington Road etc. The Canal is located c. 1.5 km as the crow flies (please see image below):

⁴ The new Facebook campus in Ballsbridge will employ c. 5,000 people which is a substantial increase of employees in the area (<https://www.irishtimes.com/business/commercial-property/facebook-move-to-ballsbridge-site-will-open-door-for-5-000-jobs-1.3690665>)

⁵ As stated by the Irish Times, Amazon’s decision to secure the Charlemont Square offices will give it the capacity to increase its existing Dublin-based workforce by an additional 1,700 workers (<https://www.irishtimes.com/business/commercial-property/amazon-strikes-deal-for-new-dublin-offices-1.4099458>)

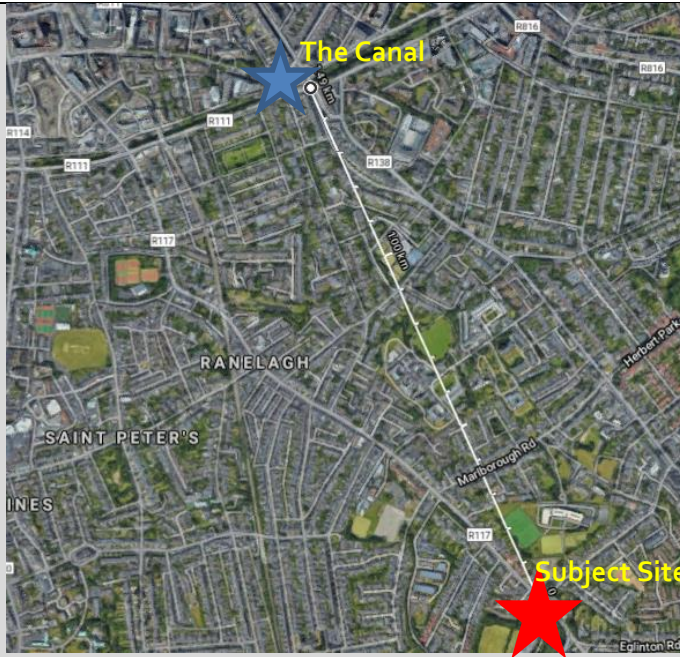


Figure 2.1: Map Demonstrating Location of the Canal Proximate to the Subject Lands (c. 1.5 km as the crow flies)

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2021)

2. *Sites within reasonable walking distance (i.e. up to 10 minutes or 800 – 1,000 m) to/from high capacity urban public transport stops (such as DART or Luas); and*
- In this regard, the subject site is located in proximity to the following Green Line Luas stops:
 - Beechwood: c. 720 metres as the crow flies (1 Km walk/ c. 13 minute walk)
 - Cowper: c. 740 metres as the crow flies (c. 1.3 Km walk/ c. 17 minute walk)
 - Milltown: c. 918 metres as the crow flies (c. 1.3 Km walk/ c. 17 minute walk)
 - Ranelagh: c. 1.1 Km as the crow flies (c. 1.1 Km walk/ c. 14 minute walk)



Figure 2.2: Luas Stop Located 1 km/c. 13 minutes Walking Distance from the Subject Site

(Source: Google Maps, annotated by Thornton O’Connor Town Planning, 2021)

The Green Line Luas allows easy access to a significant quantum of employment locations throughout the City Centre, North and South Dublin City, North and South of Dublin County in addition to the opportunity for users to change onto the Red Line Luas at O’Connell Street/Abbey Street which would provide access to employment locations to the east and west of the City Centre.

3. ‘Sites within easy walking distance (i.e. up to 5 minutes or 400 – 500m) to/from high frequency (i.e. min 10 minute peak hour frequency) urban bus services.’

We note that the nearest bus stop that operates with a 10-minute peak frequency is c. 550 metres from the subject site, just 50 No. metres outside the range outlined above. However, it is worth noting an example of the proximate bus services that are available in addition to the Green Line Luas at Beechwood which is located 1 km/c. 13 minutes walking distance from the site as discussed above:

No. 39A (10 minute peak frequency)

- Stop No. 775 (Inbound – c. 600 metres/c. 7 minute walk)
- Stop No. 758 (Outbound - c. 550 metres/c. 7 minute walk)

No. 46A (7-10 minute peak frequency)

- Stop No. 775 (Inbound - c. 600 metres/c. 7 minute walk)
- Stop No. 758 (Outbound - c. 550 metres/c. 7 minute walk)

No. 145 (10 minute peak frequency)

Stop No. 775 (Inbound - c. 600 metres/c. 7 minute walk)
 Stop No. 758 (Outbound - c. 550 metres/c. 7 minute walk)

No. 11 (15-30 minute peak frequency)

Stop No. 884 (Inbound - c. 80 Metres/c. 1 minute walk)
 Stop No. 855 (Outbound - Directly opposite the site on Sandford Road)

No. 18 (20-30 minute peak frequency)

Stop No. 2791 (Inbound – c. 1 km/13 minute walk)
 Stop No. 416 (Outbound – c. 1.6 km/20 minute walk)

Aircoach (15 minutes peak frequency)

Stop No. 773 (Inbound – c. 700 metres/c. 9 minute walk)
 Stop No. 759 (Outbound – c. 750 metres/c. 9 minute walk)

No. 155 (20 minute peak frequency)

Stop No. 775 (Inbound – c. 600 metres/c. 7 minute walk)
 Stop No. 758 (Outbound - c. 550 metres/c. 7 minutes walk)

No. 44 (Hourly peak frequency)

Stop No. 884 (Inbound - c. 80 metres/c. 1 minute walk)
 Stop No. 885 (Outbound - Directly Opposite the Site on Sandford Road)

No. 61 (Hourly peak frequency)

Stop No. 884 (Inbound - c. 80 metres/c. 1 minute walk)
 Stop No. 855 (Outbound - Directly Opposite the Site on Sandford Road)

Therefore, as set out above, the subject site can be considered as a central and/or accessible location as defined by the *Apartment Guidelines, 2020*. Furthermore, we note that the subject site will benefit from planned national bus network investments i.e. bus connects as detailed at Section 3.4 of this report.

Section 4.19 of the *Apartment Guidelines, 2020* state that '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.' It is considered that (private) car parking provisions can be reduced as part of the proposal especially given the proposed tenure (split between Build-to-Sell and Build-to-Rent) and the accessibility of the subject site.

As such, the inclusion of Build-to-Rent apartment units within the wider residential scheme also comprising Build-to-Sell units provides a welcome alternative in this area of Dublin City.

2.3 There is an Acute Shortage of Rental Units Available in the Local Area

It is well documented that there is a critical shortage of residential accommodation in Ireland and it is considered that the development of Build-to-Rent units have the potential to emerge as a distinct segment within the overall accommodation sector.

As noted above, rental properties are in scarce supply. We submit that the proposed Build-to-Rent element of the scheme will provide an alternative rental option that delivers high quality social interaction/amenity spaces. As a result of the disparity between supply and demand in rental accommodation, the price of available properties has become unaffordable for many workers as discussed in Section 2.4 below.

2.4 Rental and Sale Price of Units in Dublin 6

The Daft.ie Rental Price Report entitled 'An analysis of recent trends in the Irish rental market 2021 Q2' documents a slight decrease in rents for housing options over 12 months from Q2 2020 to Q2 2021 in the Dublin 6 area. As documented in Figure 2.3 below, the average monthly rental cost for a one bed apartment in Dublin 6 is €1,751, which represents an decrease of 6.6% from Q4 2019 to Q4 2020. To rent an average house in Dublin 6 ranges from €1,751 to €2,877 per month (dependent on number of bedrooms).

	1 Bed Apartments	2 Bed House	3 Bed House	4 Bed House	5 Bed House
Dublin 6	€1,766	€2,008	€2,270	€2,603	€2,907
Percentage Change from Q2 2021	-3.7%	-2.3%	-3.6%	-0.5%	-0.9%

Figure 2.3: Average Rental Prices in Dublin 6

(Source: Abstracted from https://ww1.daft.ie/report/2021-Q2-rental-daftreport.pdf?d_rd=1)

Although there has been a slight reduction in rental prices in the Dublin 6 area, the Daft.ie Report notes the following on page 4:

*'The hope for renters and for Irish society is that August will mark the low-point – as has been the case in other years and reflecting the timing of leases for the academic year. **But the underlying pressure on Ireland's rental system is intense and the supply shortages are chronic and worsening.** It is very likely that Ireland's population passed the five million mark at some point late last year. If Covid-19 hadn't happened, we would have seen that confirmed in the 2021 Census – but that has now been pushed back a year. Regardless, it means that in the fifteen years since the 2006 Census, Ireland has added over 800,000 people to its population. For context, it took Ireland 25 years to add the previous 800,000 people (1981-2016) and for an earlier instance of Ireland adding 800,000 people, you would have to go back to the pre-Famine period.*

But with all that population growth, next-to-no new rental homes have been added. Ireland's rental sector is something like 50% larger now than fifteen years ago but the availability of homes to rent online is half of what it was then.

*Clearly, this is a problem that cannot be solved by simplistic rent controls, which will at best hide the problem and are more likely to bring new forms of 'equilibration' – including under-the-counter payments and discrimination of various forms. **To solve this, instead of wishing the problem away, new rental homes must be built.*** [Our Emphasis]

As seen in the Q2 2021 Daft Report, there is a chronic shortage of rental properties in the Country. We note that the Build-to-Rent element of the scheme will provide an accommodation typology for persons looking to rent close to excellent public transport, employment opportunities, services and facilities. In addition, the provision of amenities and facilities for social interaction and integration within the site will ensure a high-quality standard of living for the residents of the entire scheme.

We also consider it appropriate to address the shortage of housing units available to purchase in Dublin. The Daft.ie House Price Report entitled 'An analysis of recent trends in the Irish residential sales market for 2021 Q2' as documented below in Figure 2.4, provides the average asking price for apartments and dwellings in Q2 2021 when compared to Q2 2021 in the Dublin 6 area:

	1 Bed Apartments	2 Bed Terraced	3 Bed Semi-Detached	4 Bed Bungalow	5 Bed Detached
Dublin 6	€341,000	€487,000	€670,000	€1,111,000	€1,202,000
Percentage Change from Q2 2020	-4.7%	+6.8%	-4.7%	-2.6%	+4.9%

Figure 2.4: Average Asking Prices in Dublin 6

(Source: Abstracted from [2021-Q2-houseprice-daftreport.pdf](https://www.daft.ie/reports/2021-Q2-houseprice-daftreport.pdf))

There has been an increase in the house prices for 2 No. bed terraced houses, 3 No. bed detached dwellings, 4 No. bed detached dwellings and 5 No. bed detached dwellings and slight reduction in the price of 1 No. bed apartments in Dublin 6. The Daft.ie Report notes the following on page 3:

'So while construction remains woefully inadequate compared to the true level of housing need in Ireland – likely as high as 50,000 new homes across all tenures and types – it can't explain the spike in prices over the last year. Instead, it is the second-hand market that is driving the fall-off in supply. Between 2015 and 2019, the typical month in Ireland saw just under 5,000 homes listed for sale, the vast majority of those second-hand.

Since the start of 2021, however, listings have been extraordinarily weak, as the country grappled with the early-2021 wave of Covid-19. When things were at their worst, in January and February, the number of homes coming on to the market was more than one third lower than the 2015-2019 average. But as those are two of the quieter months of the year, the loss was both smaller and more easily reversed, if subsequent activity was at a higher level. Instead, these trends continued into the middle of the year. Each of March, April and May were quieter than any of their counterparts in the period 2015-2019. Overall, across the first five months of 2021, just over 20,000 homes were listed for sale. This is 22% lower than the average for 2015-2019. That is almost 5,600 homes that ordinarily would have come onto the market but didn't. With the budgets of first-

time buyers up, and supply down by so much, it is hardly any wonder that prices have jumped as much as they have...Beyond 2021, however, we cannot rely on recycling the same stock of housing as our population grows and as our household size shrinks. The country desperately needs tens of thousands of new homes a year – and for decades.'

The proposed residential development will provide choice of tenure as both Build-to-Rent and Build-to-Sell units are proposed within the scheme, recognising the need for alternative types of accommodation to facilitate the societal and economic changes, which would be better suited to reflect household formation and housing demand. Please see Section 2.5 below which demonstrates the disproportionate correlation between household sizes and house sizes in the Rathmines East B Electoral Division where the subject site is located.

2.5 Demographics of the Area

The subject site is located in the Rathmines East B ED which recorded an average of 2.3 No. persons per private household in 2016. This is lower than the national state average of 2.7 No. persons and the Dublin average of 2.5 No. persons (see Figure 2.5 below).

Average Household Size ⁶			
Area/ED	No. of Households	No. of Persons Accommodated	Average Household Size
Rathmines East B ED	2,410	5,605	2.3
Dublin City	211,747	525,229	2.5
Ireland	1,702,289	4,676,648	2.7

Figure 2.5: Average Household Size of the Rathmines East B ED, Dublin City and the State

(Source: Census 2016/CSO)

Therefore, the ED is predominated by smaller households and it is important to provide tenure choice for such household formations as is provided in the subject scheme with a predominance of studio, one and two bedroom units.

In addition, there are a large number of permanent private households which comprise 4 rooms⁷ or more within the Rathmines East B ED (1,441 No.) as demonstrated in Figure 2.6 below:

⁶http://census.cso.ie/sapmap2016/Results.aspx?Geog_Type=ED3409&Geog_Code=2AE196291DD413A3E05500000000001#SAPMAP_T8_801

⁷ Census 2016: Do not count bathrooms, toilets, kitchenettes, utility rooms, consulting rooms, offices, shops, halls or landings, or rooms that can only be used for storage such as cupboards. Do count all other rooms such as kitchens, living rooms, bedrooms, conservatories you can sit in, and studies. If two rooms have been converted into one, count them as one room.

Permanent Private Households by Number of Rooms ⁸		
No. of Rooms	No. of Households	No. of Persons Accommodated
1 room	93	144
2 rooms	313	548
3 rooms	412	839
4 rooms	408	820
5 rooms	308	758
6 rooms	250	651
7 rooms	190	564
8 or more rooms	285	955
Not stated	151	326
Total	2,410	5,605

Figure 2.6: Permanent Private Households by Number of Rooms for the Rathmines East B Electoral Division

(Source: Census 2016/CSO)

Having regard to the above table, it can be concluded that the correlation between household sizes and average size of houses is disproportionate as the data demonstrates that despite the smaller average household sizes of 2.3 in the area, a large number of households comprise dwellings with 4 to 8+ rooms.

It is our opinion that there is a significant opportunity to provide a mix of studio, one, two and three bedroom units in this area of Dublin, which will better serve the demographic profile of the area, allowing people to rent in this area or to trade down from large houses to smaller units. The Build-to-Rent element of the scheme will provide rental options in the area whilst the Build-to-Sell units will provide an opportunity for people to purchase dwellings within the scheme and as such the scheme will cater for a wide cohort of persons.

⁸http://census.cso.ie/sapmap2016/Results.aspx?Geog_Type=ED3409&Geog_Code=2AE196291DD413A3E05500000000001#SAPMAP_T6_650

3.0 SITE LOCATION, DESCRIPTION AND CONTEXT

3.1 Site Location and Description

The subject application site is located at the corner of Sandford Road and Milltown Road, Dublin 6.



Figure 3.1: Aerial View of Subject Site, Indicative Application Site Boundary in Red

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2021)

The total red line application site boundary is c. 4.74 Ha (c. 47,335 sq m) and is broken down as follows:

1. The developable site of c. 4.26 Ha (c. 42,547 sq m) at Milltown Park, Sandford Road;
2. Road works to Milltown Road and Sandford Road adjacent to the 2 No. entrances to the site (1 No. existing and 1 No. newly proposed): c. 0.16 Ha (c. 1,597 sq m); and
3. Drainage works from Milltown Road to Eglinton Road: c. 0.32 Ha (c. 3,191 sq m).

The developable lands are bounded to the north by Norwood Park and Sandford Road, to the east by the Milltown Road, to the south by a carpark associated with the Milltown Park Institutional and Community premises (buildings retained by the Jesuits after the disposal of the 'developable lands') and to the west by 2 No. storey existing residential dwellings located on Cherryfield Avenue Upper and Cherryfield Avenue Lower.

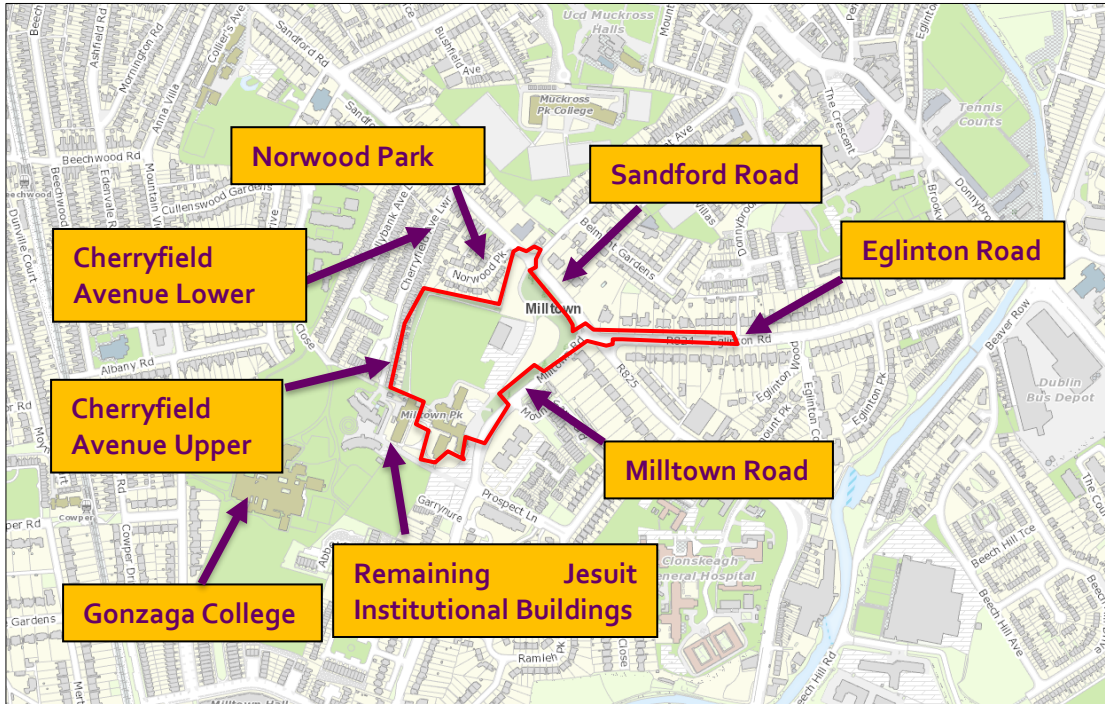


Figure 3.2: Location of Subject Site (Indicative Site Boundary Outlined in Red)

(Source: www.myplan.ie, annotated by Thornton O'Connor Town Planning, 2021)

3.2 Details of the Existing Buildings

The subject site is irregular in shape and has a generally flat topography. The current building range at the subject site comprises the original Milltown Park House building with 5 No. extensions attached to the original structure. The buildings are positioned in the south-eastern corner of the subject site which formed part of the Jesuit Campus at Milltown Park and which is no longer in use at the site (letter confirming that the lands are no longer required by the Jesuit Community is attached as an Appendix to this Report). The remainder of the subject site is largely undeveloped.

As a result of the decline experienced by the Jesuits and departure of the clerical students from the application site, the site was sold to the Applicant and comprises a range of former institutional buildings and large unutilised green spaces which have become surplus to the Jesuit Community's requirements and are no longer required for the purposes of its function and mission.

The site is currently accessed from Sandford Road to the north of the site, however we note that this site has never been opened up for the wider public to utilise. The existing entrance from Milltown Road into the remaining Jesuit lands is not in the control of the Applicant, necessitating the requirement for a new primary entrance to the site off Milltown Road.

As noted above, the existing building range is located in the south-eastern corner of the subject site and ranges in height from 2 No. to 4 No. storeys. The breakdown of each building element is presented in Figure 3.3 below and the descriptions of each building have been extracted from the Architectural Heritage EIAR Chapter 7 which has been prepared by Molloy and Associates Conservation Architects. Tabor House and The Chapel will be reused and refurbished as part of the proposed development.



Figure 3.3: Outline of Building Range Which Identifies Each Building Element Existing at the Subject Lands

(Source: Molloy and Associates Conservation Architects – Architectural and Cultural Heritage EIAR Chapter 7)

Building A - Milltown Park House



Figure 3.4: Front Elevation of Milltown Park House

(Source: Molloy and Associates Conservation Architects, 2021)

The earliest of the buildings is a late-18th century villa, constructed as a residence fronting Milltown Road, but accessed principally from Sandford Road. The original Milltown Park

House has been modified beyond recognition in its extension to the south, east and north, with significant alterations internally which has irreversibly eroded its significance.

The building is not included on the Record of Protected Structure, nor is it included in the National Inventory of Architectural Heritage ("NIAH"). The current architectural composition of Milltown Park House cannot be deemed to uphold design ethics representative of what would comprise an exemplar. The architectural significance of the house has been reduced significantly on account of its many interventions. Its original setting is removed and its new setting is regrettably one of architectural confusion.

Building B - Milltown Park House Extension



Figure 3.5: Images of the Milltown Park Extension

(Source: Molloy and Associates Conservation Architects, 2021)

The design of the rear extension block, as originally constructed, attempted ambitious harmony with the extended Milltown Park House in the creation of an H-block, culminated with the House to the east and a matching wing to the west. The lower central section, which contained the original domestic chapel, subsequently repurposed as a reading room, was extended vertically in 1932 to match the heights of the end blocks.

The taller, early 20th century central portion's southern elevation is modernistic in its treatment, having modulated fenestration expressed up to parapet level. Its simpler northern elevation was of later origin again.

The extension is much modified internally. It comprises a corridor with cellular rooms to the south and either side in its rear wing on all five levels. Its rear wing, culminating its western elevation, expands to form an H-shape corresponding with the form of Milltown Park House, and houses sanitary facilities and stores. The building's original setting to the north, south and west has been dramatically altered in subsequent expansion of accommodation. The interior is absent of decorative detail.

The extension is not included on the Record of Protected Structures, nor is it included in the NIAH. It is maintained that the building is intrinsically connected with its original function as an institution and does not lend itself easily to alteration to another use. As a non-protected structure, adaptive re-use would essentially remove the limited architectural character internally. As a consequence of the permanent removal of function, together with a view that on balance, it does not possess the range of characteristics meriting retention, its demolition is inevitable.

Building E - Finlay Wing



Figure 3.6: Images of the Finlay Wing

(Source: Molloy and Associates Conservation Architects, 2021)

The external character of the Finlay Wing as existing comprises its reconstruction following a fire in 1949, where a four storey over basement building was altered as a single volume building. Externally, the building is sparse and reflective of the budget-driven economy of mid-20th century. The building is not included on the Record of Protected Structures, nor is it included in the NIAH.

The interior is pleasing, but commonplace. The building is of quality, but not to the extent where it is considered an exemplar. Its reconstruction following a fire as a single storey over basement building is much altered from its original intended design. It is proposed to demolish the Finlay Wing.

Building F - The Archive



Figure 3.7: Images of the Archive

(Source: Molloy and Associates Conservation Architects, 2021)

The archive building has a modest exterior, comprising a simply rendered concrete block building with Art Deco characteristics. Its external composition is representative of wartime Ireland where materials and labour were in sparse supply. The building’s interior reflects its function as an archive. A quadrangle generated by a pressed copperclad structure encircling at three levels an apse ended lantern roof light, comprises book shelving aligned with the structure to create bays each having their own window. A mundane single storey flat roof extension has been constructed adjoining the south gable.

The building does not benefit from any independent external access. Its singular point of entry is internally, via the Milltown Park House Extension (Building B), which involves a series of level changes.

The building is not included on the Record of Protected Structures, nor is it included in the NIAH. The building is introverted and does not connect with its landscape, with its external presence benign within its setting and it is proposed to be demolished.

Building Element C - Tabor House



Figure 3.8: Image of Tabor House

(Source: Molloy and Associates Conservation Architects, 2021)

Tabor House comprises a three storey over basement building, and possesses a strong exterior of rusticated granite, with sweeping entrance steps centrally positioned to the east. The west elevation is a continuance of the style of the east, with a central bowed stair bay. The building has a slated pitched roof, timber sash windows and timber panelled doors.

The building is not included on the Record of Protected Structures, nor is it included in the NIAH. The building is a good example of institutional 19th century architecture. The building is typical of its era of construction, but is set apart by the quality of its exterior. It is simply

detailed internally, with its exterior found to comprise an exemplar of its period. The structure contributes to its parkland setting and enriches the architectural character of the public realm as visible from Milltown Road. Tabor House, whilst clearly institutional in origin, has the benefit of a singularly strong external form, which follows through to a rational internal form. As a consequence, its re-use is possible.

Tabor House will therefore be refurbished in the proposed development and repurposed to provide 24 No. Build-to-Rent units and resident amenity space.

Building Element D - The Chapel Building



Figure 3.9: Image of the Chapel

(Source: Molloy and Associates Conservation Architects, 2021)

The chapel grouping, comprising a sacristy, vestry and gallery, is an exemplar of its era. Its external form is strong, and legible on the north-west elevation with copper clad bow ends and elegant fenestration. Much of the exterior of the building is largely concealed by taller structures to the east (link building between Tabor House and Milltown Park House); north (Tabor House) and south (Milltown Park House rear extension). Entry level is accessed up a short flight of steps from the corridor of the Milltown Park rear extension block, leading to the link building between Tabor House and Milltown Park House Read extension and it is proposed to construct two new entrances to facilitate access into the former Chapel to improve its connection with the proposed development.

The building is not included on the Record of Protected Structures, nor is it included in the NIAH. The structure contributes to its parkland setting. The building is typical of its era of construction but is set apart by the quality of its materials and artistic elements. The building's interior is an exemplar of its era that endures to the present day.

The Chapel was constructed to fit neatly in a tight space between Tabor House and the rear extension to Milltown Park House. However, as a set piece it is found to have formed a viable architectural connection with Tabor House that will have the capacity to endure in the detachment of these forms from the wider grouping.

The Chapel can be purposefully re-used as communal amenity space, whilst retaining its spatial and decorative character and will provide a very characterful amenity space for the future residents of the scheme.

Link Red Brick Building to Retained Jesuit Lands

The building group is attached to the retained Jesuits lands by way of a single storey over basement 'red brick link building'. As described in the Statutory Notices⁹, a portion of the red brick link building within the subject site will be demolished. Once this portion of the 'link' building has been demolished and 'made good' within the subject site, a new 2.4 metre high boundary wall will be provided. This will facilitate a new permanent site boundary line which will delineate between the Jesuit Community lands being retained by the Jesuits and the proposed new residential development on lands to the north of the boundary wall.

The reuse of Tabor House and The Chapel will represent the viable adaptation of these interesting buildings within the development which will be visible from the surrounding streetscape. The development has utilised the remainder of the site to incorporate new structures to provide a range of residential units and tenures, residents support facilities and amenities and a creche, as well as the extensive open spaces provided.

3.3 Site Context

The subject site is located on the junction of the Milltown Road and Sandford Road. This junction also immediately connects to Eglinton Road (R824) and St James Terrace / Clonskeagh Road (R825). This places the subject site at the interface between the urban villages of Ranelagh, Milltown, Donnybrook and Clonskeagh.

The immediate area beyond the Milltown Park campus is predominantly residential and institutional in nature. The residential units include 2 No. storey houses located adjacent to the western site boundary along Cherryfield Avenue Lower and Cherryfield Avenue Upper and in Norwood Park located adjacent to the north-western boundary. In addition, a 6 No. storey apartment development known as Cedar Hall and a 3 No. storey apartment complex known as Mount Sandford are located to the east of the subject site across Milltown Road.

Institutional uses are located adjacent to the south-west of the subject site and comprise of the Milltown Park Community House, Cherryfield Lodge Nursing Home and Gonzaga College. Muckross Park College is also located to the north-west of the subject lands. A Circle K Petrol Station is located to the north of the subject lands along Sandford Road.

⁹ The existing Link Building is the subject of a separate application for permission (Council Ref. No. 3866/20) that includes a request for permission to demolish that Link Building, including the part of the building on the lands the subject of this application for SHD permission. If that application is granted and first implemented, no demolition works to the Link Building will be required under this application for SHD permission. If that application is refused permission or not first implemented, permission is here sought to demolish only that part of the Link Building now existing on the lands the subject of this application for permission and to make good the balance at the red line with a blank wall.

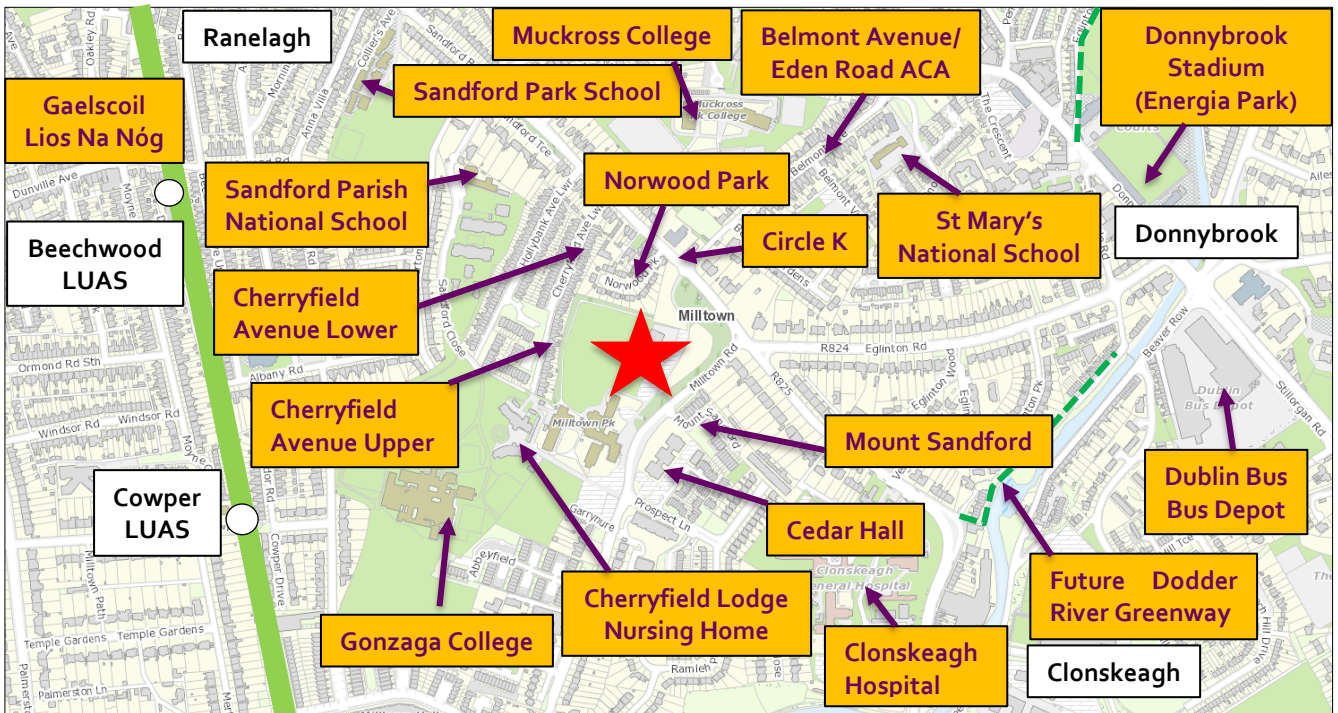


Figure 3.10: Context Surrounding the Subject Site (Highlighted Indicatively by the Red Star)

(Source: Myplan.ie, OSI Map Layer, annotated by Thornton O'Connor Town Planning, 2021)

It is clear from Figure 3.10 above that a wide range of services and facilities are located in close proximity to the subject site for future residents to utilise.

3.3.1 Nearby Neighbourhood Centres

There are a number of neighbourhood centres near to the subject site with some forming strong urban villages. The following neighbourhood centres are within walking/cycling distance of the subject site:

- **Milltown-c.450 metres/c.6 minutes walking distance/c.1 minute cycling distance:**

Services/Facilities include: Eurospar, Wilde and Green Café, New Element Fitness Gym, Poise Hair Salon, Daisy Chain Montessori and Childcare, Milltown Dental Clinic, Milltown Dry-Cleaning and Laundry Service, Milltown Total Health Pharmacy, Phelans Pharmacy, Parish of Columbanus, Saint Gall and Assumption of the Blessed Virgin Mary Church for example;

- **Donnybrook-c.500 metres-c.900 metres/c.6-10 minutes walking distance/c.2-3 minutes cycling distance:**

Services/Facilities include: Donnybrook Fair, Donnybrook Lawn Tennis Club, Tesco Express, Lloyds Pharmacy, Boots Pharmacy, Spar Donnybrook, Energia Park (Donnybrook Stadium), Beactive Rangers Football Club, Be Active Lawn Tennis Club, Lyk Nu Cleaners, AIB Bank, 115 Medical (Doctor), D4 Medical Centre, The Grafton Barber, Donnybrook Dental Practice, 93 Hairdressing, Mary Moore Podiatry/Chiropody, Brens Barber Shop, Donnybrook Foot

Mechanics, Skin by Olga, Di Milo Hair Design, Mink Hand & Foot Spa, Donnybrook Bikes, O'Brien's Off Licence, Fast Fit (Car Repair and Maintenance), First Stop Garage, Donnybrook Parish-Church of the Sacred Heart, Insomnia Café, McCloskey's Bar, Café Java, Green Beards Café, Nourish Donnybrook Health Food Store, Marco Pierre White Courtyard Bar and Grill, the Donnybrook Gastropub, Mulberry Garden Restaurant, Romayo's Donnybrook Fish and Chips, Abrakebabra, Eddie Rockets, Arthur Mayne's Bar, Black Pepper Indian Restaurant, Café Nero, Mao at Home Restaurant, Le Comptoir and Café Diem for example;

- **Clonskeagh – c.350 metres – 1.3 km /c.6-16 minutes walking distance/c.1-6 minutes cycling distance:**

Services/Facilities include: The 105 Café, Ashtons Gastro Pub, Clonskeagh Hospital, Sims Clinic, Platinum Pilates and Physiotherapy, David Lloyd Gym, Harrys Bikes, Applegreen, Farmer Browns Pub and Bombay Pantry Restaurant for example;

- **Ranelagh-c.500 m-1.4 km/c.6-18 minutes walking distance/c.1-5 minutes cycling distance:**

Services/Facilities include: Ranelagh Physiotherapy-the Physio Company, Meagher's Pharmacy Sandford Road, Meagher's Pharmacy Ranelagh Village, Scoop Ranelagh Ice Cream Shop, The Red Lotus Hand and Foot Spa, The Village Butcher Shop, The Stella Cinema Ranelagh, The Devlin Hotel, Tesco Express, Oslo Beauty Ranelagh, Joys Flowers Florist, Anastasia Boutique, Ranelagh Launderette, Expert Hardware, Bank of Ireland, Ranelagh Thai Centre Massage Therapist, i-Service Mobile Repairs, Boylesports Bookmakers, Gmale Barbers, The Company of Books, Headcases Hair Studio, Yogabase Ranelagh, The Zip Yard Sewing Shop, Ranelagh Village Dental, Seagreen Boutique, Leech Pharmacy, Origin Hair Salon, Brown Sugar Hairdresser, Advanced Electrolysis Clinic, Rouge Beauty Salon, Lidl, Ranelagh and District Credit Union, Ranelagh Post Office, Spar, AIB Bank, Burke's Pharmacy, Flyefit Ranelagh, SuperValu, Wildflower Hair Salon, Ranelagh Park Playground, Ranelagh Seventh-day Adventist Church, Archview Physiotherapy, White Crane Kung Fu and Tai Chi, Mountpleasant Square Park and Mountpleasant Lawn Tennis Club for example;

A large number of café/restaurants/bars are located within Ranelagh including the following:

Pizza Yard Restaurant, R McSorleys Bar, The Wild Goose Grill, Birchalls Bar, Americana Bar, Layla's Rooftop Restaurant, New Bamboo Chinese Takeaway, Nightmarket Thai Restaurant, Bunsen Restaurant, Four Star Pizza, La Bodega Restaurant, Cinnamon Restaurant, Humphrey's Pub, Smyths of Ranelagh Bar, Er Buchetto Café, Butcher Grill Steak House, Antica Venezia Restaurant, Tribeca Restaurant, Butlers Chocolate Café, Gigi Restaurant, Tonys Café, Dillinger's Restaurant, Mario's Italian Restaurant, Zaytoon Restaurant, Milano Restaurant, The Taphouse Bar, Wowburger Restaurant, DIEP Thai Takeaway, Kinara Kitchen Restaurant, The Exchequer Wine Bar, Rita's Restaurant, Emerald Court Chinese Restaurant, Nick's Coffee and Pinocchio Restaurant for example;

- **Beechwood-c.1 Kilometre/c. 13 minutes walking distance/c.4 minutes cycling distance:**

(Services/Facilities include: Mima Coffee Company, Mortons Store, The Best of Italy Store, Peperina Garden Bistro, Keegans Launderette and Dunville Pharmacy for example).

- Rathmines-c.1.8-2.2 km/c.22-c.28 minutes walking distance/c.6-c.8 minutes cycling distance:

(Services/Facilities include: The Swan Shopping Centre [which includes Omniplex Cinema Rathmines, McDonald’s Restaurant, Dunnes Stores, Starbucks, Butlers Chocolate Café, and Elephant and Castle Restaurant for example] in addition to The Stella Cinema, Eddie Rockets, Copán Bar, Lenehans Bar and Grill, Rody Bolands Bar, Blackbird Pub, Tesco Metro, Tesco Express, Lidl, Aldi, Saba to Go, Bombay Pantry, Tolteca Restaurant, Umi Falafel, Farmer Browns Restaurant, Camille Thai Restaurant, Uno Pizza, Dominos Pizza, Apache Pizza, Subway, Baked Café, The Laundry and Dry Cleaning Shop, The Cartridge Shop, Nethouse Internet Café, Doctors Clinic Rathmines, Rafter’s Medical Centre, Dental Flair, Peter Marks Hairdressers, Heaven Beauty Salon, Daniel and Andrew Hair Salon, Rathmines Library, EBS Bank, Bank of Ireland, Rathmines Life Pharmacy, Boots Pharmacy and Rathmines Post Office for example).

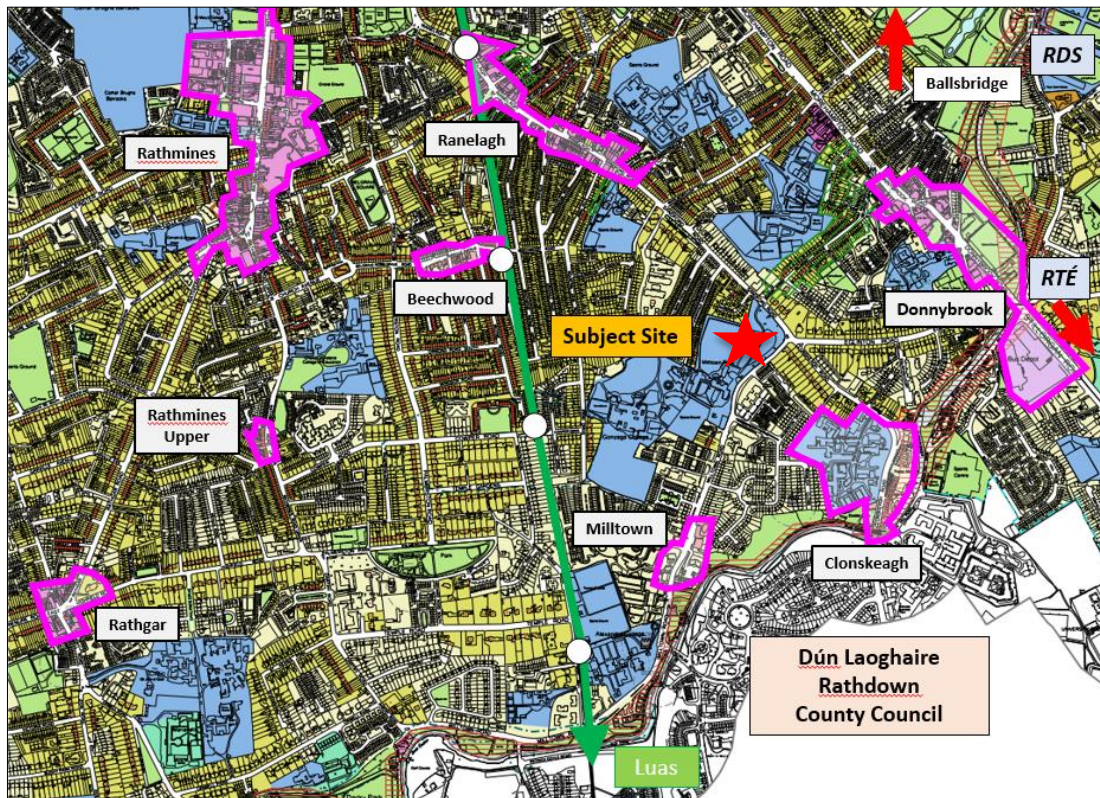


Figure 3.11: Neighbourhood and District Centres in the Surrounding Area

(Source: *Dublin City Council Development Plan 2016-2022, Map H*, annotated by Thornton O’Connor Town Planning, 2021)

3.3.2 Social and Community Audit

As part of the *Dublin City Council Development Plan 2016-2022* there is a requirement for a ‘Social and Community’ audit for developments over 50 No. units:

Policy SN5:

‘To ensure that applications for significant large new developments (over 50 units) are accompanied by a social audit and an implementation and phasing programme in

relation to community infrastructure, so that facilities identified as needed are provided in a timely and co-ordinated fashion.'

We note that a fully detailed *Social Infrastructure Audit* and *Childcare Demand Assessment* has been prepared by KPMG Future Analytics. The catchment area for the study undertaken is defined by a 2 km radius. The *Social Infrastructure Audit* sets out that the following services and facilities are located within the 2 km catchment area:

- **84 No. Childcare and Education Facilities**

(44 No. Childcare Facilities, 22 No. Primary Schools, 15 No. Post-Primary Schools, 1 No. 3rd Level Institution and 2 No. Further Education Training Facilities)

Note: The *Social Infrastructure Audit* states that there is capacity for c. 16-17 No. pupils within the existing childcare facilities, c. 162-163 No. pupils in primary schools and c. 35 No. pupils in post-primary schools within a 2 km radius of the site.

The *Social Infrastructure Audit* notes that:

'According to the most recent version of the 'Current Status of Large Scale Projects Being Delivered Under the School Building Programme' published by the DES on 31 July 2021, there are multiple schools within the area which are identified for an extension/refurbishment. Shellybanks ETNS is currently at Stage 2b (Detailed Design) and Gaelscoil Na Fuinseoige is currently at the Project Brief Stage. The delivery of these projects will notably create additional capacity within the area to that identified within the existing primary schools'.

In relation to childcare facilities, the *Childcare Demand Assessment* enclosed notes:

'In conclusion and for the reasons set out above, the proposed development does not generate demand for a childcare facility. Despite this, the Applicant has decided to include a crèche within Block F of the development in accordance with the required floor areas which will meet the childcare demand generated by the proposed development, as well as serve the wider community. Positively, its delivery will enhance the availability of and access to childcare facilities in the locality'.

This creche will cater for the future residents of the development and the existing residents in the surrounding area, therefore increasing the capacity of childcare facilities for the area.

- **181 No. Health Services and Facilities**

(6 No. hospitals, 20 No. medical centres, 48 No. GP practices, 23 No. dental practices, 20 No. counselling/therapy services, 13 No. physiotherapist services, 8 No. nursing homes, 7 No. specialist/ health specialist and 36 No. pharmacies)

- **40 No. Community Services and Facilities**

(7 No. Credit Unions, 6 No. Post Offices, 15 No. Community Centres and 12 No. Libraries)

- **72 No. Sports and Recreation Facilities**
(49 No. Sports Clubs, 10 No. Gym/Health Centre and 13 No. Parks)
- **23 No. Faith Facilities**
(22 No. Faith Facilities and 1 No. Cemetery)
- **3 No. Emergency Related Facilities**
(1 No. Fire Station and 2 No. Garda Station)

The Social Infrastructure Audit concludes the following:

'The baseline study undertaken identified a significant range of services and facilities which contribute to quality of life within close proximity to the subject site. Overall, 404 social services and facilities were identified within and immediately bordering the Study Area. The largest area of which is health, followed by childcare and education and sports and recreation.'

Therefore, it is considered appropriate to provide a residential development at the subject site with ancillary residential support facilities and amenities and a crèche. Although the Childcare Demand Assessment prepared by KPMG Future Analytics enclosed separately concludes that there is sufficient capacity in the area to cater for the proposed development, the Applicant has decided to incorporate a crèche into the scheme which will benefit the future residents of the development but will also cater for the immediate existing residents of the area.

3.4 Accessibility

3.4.1 Introduction

The subject site is located on a main arterial road (R 117) from the southern suburbs into the Dublin City Centre. The N11 National Road can also be easily accessed via Eglinton Road. As noted briefly in Section 2.2.1, the subject site is located in a 'Central and/or Accessible Urban Location' as defined by the *Apartment Guidelines, 2020*.

The site is well served by public transport with a range of Luas stops and Dublin Bus stops within walking distance of the site. The site is also located in proximity to various locations such as the City Centre, Donnybrook, Ranelagh, Clonskeagh and Ballsbridge. This range of accessibility by public transport, cycling and by foot allows access to local level services, nearby employers and the City Centre. We note that proximate bus stops will be discussed in Section 3.4.3.

3.4.2 Luas Light Rail

The subject site is located in close proximity to the following Green Line Luas stops:

- Beechwood: c. 720 metres as the crow flies (1 Km/ c. 13 minute walk)
- Ranelagh: c. 1.27 Km (1.1 Km walk/14 minute walk)
- Cowper: c. 740 Metres (1.3 Km walk/17 minute walk)
- Milltown: c. 918 Metres (1.3 Km walk/17 minute walk)

The Green Line Luas allows easy access to a significant quantum of employment locations throughout the City Centre, North and South Dublin City, North and South of Dublin County in addition to the opportunity for users to change onto the Red Line Luas at O’Connell Street/Abbey Street which would provide access to employment locations to the east and west of the City Centre.

Currently the MetroLink service is proposed to operate from north of Swords to the Charlemont Luas stop at the Grand Canal. From here the tunnel boring machine will continue south through Ranelagh to the Beechwood Luas stop. It is here that a future connection is proposed to allow the upgrading the Luas Green line to a metro standard.

The proposed MetroLink service as a segregated and mostly underground/ sub-surface system will be a fully automatic service which will greatly improve frequencies across the wider network and provide new improved connection to the city centre, the airport and Dublin’s rail network¹⁰.

3.4.3 Existing Bus Services

The subject site is also proximate to a number of high-frequency services with the nearby Quality Bus Corridor (QBC) in Donnybrook (c. 600 metres away) providing significant access to the city centre and wider areas of employment and education.

The No. 11 and No. 44 bus services have remained as important local linkages to southern suburbs and the city centre from the surrounding area. Additionally, the orbital route No. 18 from Sandymount to Palmerstown passes through Ranelagh (Stop No. 2791, 1 km walk). The No. 39a, 145 and 155 are all easily accessible along the Donnybrook QBC which provide frequent services to the City Centre and southern suburbs.



Figure 3.12: Existing Bus Services Surrounding the Subject Site

(Source: BusConnects.ie, annotated by Thornton O’Connor Town Planning, 2021)

¹⁰ According to www.metrolink.ie, an application for a Railway Order is expected to be lodged in 2021.

The following breakdown of nearby bus services demonstrates nearby accessibility and frequency provided by these bus routes.

Existing Bus Services in the Vicinity						
Route No.	Inbound	Distance	Outbound	Distance	Peak Frequency	Off-Peak Frequency
Operated by Dublin Bus						
No. 11	Stop No. 884 Ranelagh, Leeson Street, Dawson Street, Westmoreland Street, O'Connell Street, Parnell Square, Rotunda Hospital, Dorset Street, Drumcondra, DCU Saint Patrick's Campus, Homefarm Road, Griffith Avenue, Ballymun Road, Glasnevin Tennis Club, DCU, Saint Pappin's Road, Glasnevin Park, Wadelaide Park (Glasnevin)	c. 80 metres (c. 1 minute walk)	Stop No. 855 Clonskeagh, UCD, Roebuck Road, Bird Avenue, Goatstown, Kilmacud, Stillorgan Luas, Sandyford Business District	Directly Opposite the Site on Sandford Road	15-20 Minutes	30 Minutes
No. 39A	Stop No. 775 Morehampton Road, Burlington Road, Leeson Street – City Centre - Stoneybatter, Old Cabra Road, Navan Road,	c. 600 metres (c. 7 minute walk)	Stop No. 758 Stillorgan Road, UCD (Belfield)	c. 550 metres (c. 7 minutes walk)	10 Minutes	15-20 Minutes

	Connolly Hospital, Blanchardstown Shopping Centre, Huntstown, Ongar.					
No. 145	Stop No. 775 Morehampton Road, Burlington Road, Leeson Street, Dawson Street, Leinster Street South, Pearse Street, Westmoreland Street, Essex Street, Merchant's Quay, Usher's Quay, Victoria Quay, Guinness Storehouse, Heuston Station	c. 600 metres (c. 7 minute walk)	Stop No. 758 Stillorgan Road, UCD, Stillorgan, Foxrock, Cornelscourt, Cabinteely, Loughlinstown, Shankill, Bray and Southern Cross Retail Park.	c. 550 metres (c. 7 minutes walk)	10 Minutes	20 Minutes
No. 155	Stop No. 775 Morehampton Road, Burlington Road, Leeson Street, Dawson Street, Westmoreland Street, O'Connell Street, Phibsboro Road, Constitution Hill, Broadstone Depot, Phibsboro Shopping	c. 600 metres (c. 7 minute walk)	Stop No. 758 Stillorgan Road, UCD, Stillorgan, Foxrock, Cornelscourt, Cabinteely, Loughlinstown, Shankill and Bray DART Station.	c. 550 metres (c. 7 minutes walk)	20 Minutes	20 Minutes

	Centre, Mobhi Road, Botanic Road, Griffith Avenue, Glasnevin Tennis Club, DCU, Gulliver's Retail Park and IKEA (Ballymun).					
No. 44	Stop No. 884 Ranelagh, Charlemont Street, Earlsfort Terrace, Leeson Street, Dawson Street, Westland Row, Pearse Station, Westmoreland Street, O'Connell Street, Parnell Street, Rotunda Hospital, Dorset Street, Drumcondra Station, Drumcondra Road, DCU Saint Patrick's Campus, Home Farm Road, Swords Road, Collins Avenue, Whitehall, DCU and The Helix.	c. 80 metres (c. 1 minute walk)	Stop No. 855 Milltown, Dundrum Road, Bird Avenue, Dundrum Retail Park, Dundrum Hospital, Dundrum Luas, Dundrum Village, Dundrum Shopping Centre, Balally, Sandyford Road, Kilgobbin Heights, Ballyogan Road, Belarmine, Stepside, Enniskerry Road, Kilternan, The Scalp Wood and Enniskerry.	Directly Opposite the Site on Sandford Road	Hourly	Hourly
No. 46A	Stop No. 775 Morehampton Road, Burlington	c. 600 metres (c. 7 minute walk)	Stop No. 758 Stillorgan Road, Foxrock, Kill of the Grange,	c. 550 metres (c. 7 minutes walk)	7-10 Minutes	15 Minutes

	Road, Leeson Street, Dawson Street, Westmoreland Street, O'Connell Street, Mountjoy Street, Mater Hospital, North Circular Road, Phoenix Park.		IADT, Mountown Road Lower and Dún Laoghaire DART station.			
No. 61	Stop No. 884 Ranelagh, Charlemont, Charlemont Street, Earlsfort Terrace, Leeson Street, Dawson Street, Westland Row, Pearse Station, Trinity College, Eden Quay, Marlborough Street.	c. 80 metres (c. 1 minute walk)	Stop No. 855 Milltown, Dundrum Road, Bird Avenue, Dundrum Hospital, Dundrum Retail Park, Churchtown, Nutgrove Avenue, Nutgrove Shopping Centre, Willbrook Road, Taylors Lane, Ballyboden and Edmonstown.	Directly Opposite the Site on Sandford Road	Hourly	Hourly/ 75 Minutes
Operated by Go-Ahead Bus						
No. 18	Stop No. 2791 Rathmines, Kenilworth Square, Kimmage, Crumlin, Crumlin Childrens Hospital, Kylemore (Luas), Ballyfermot and Palmerstown.	1 km (13 minute walk)	Stop No. 416 Baggot Street, Pembroke Road Ballsbridge, Sandymount (DART), Sandymount Green.	1.6 km (20 minute walk)	15-20 Minutes	20 Minutes
Operated by Aircoach						

No. 700 (AirCoach)	Stop No. 773 Leeson Street Bridge, Saint Stephens Green, Nassau Street, Westmoreland Street, O'Connell Street, Drumcondra (Quinn's Pub) and Dublin Airport	c. 700 metres (c. 9 minute walk)	Stop No. 759 Stillorgan Village, Sandyford Luas Stop and Clayton Hotel Leopardstown	c. 750 metres (c. 9 minute walk)	To the Airport: 15 Minutes between 04.30 and 23.59 From the Airport: 15 Minutes between 03.25 to 00.25	To the Airport: 30 Minutes between 00.00 and 04.30 From the Airport: 30 Minutes between 00.25 and 03.25
---------------------------	--	---	---	---	---	--

The site's accessible location in close proximity to Luas Green Line stops and Dublin Bus stops ensures that a wide range of business districts and employment locations are easily accessible from the site (please see Section 3.4.4 below for further details).

3.4.4 A Large Variety of Business Districts and Employment Locations Can be Easily Accessed By Public Transport and Many Are Also Within Easy Cycling and Walking Distance of the Subject Site

This section will set out the wide range of business districts and employment locations which can be easily accessed from the subject site either by public transport, cycling or walking. The following map produced by All-Ireland Research Observatory ("AIRO") on behalf of the CSO based on the 2016 Census demonstrates the level of employment concentration around the above mentioned clusters. This data is based on daytime population above the resident population.

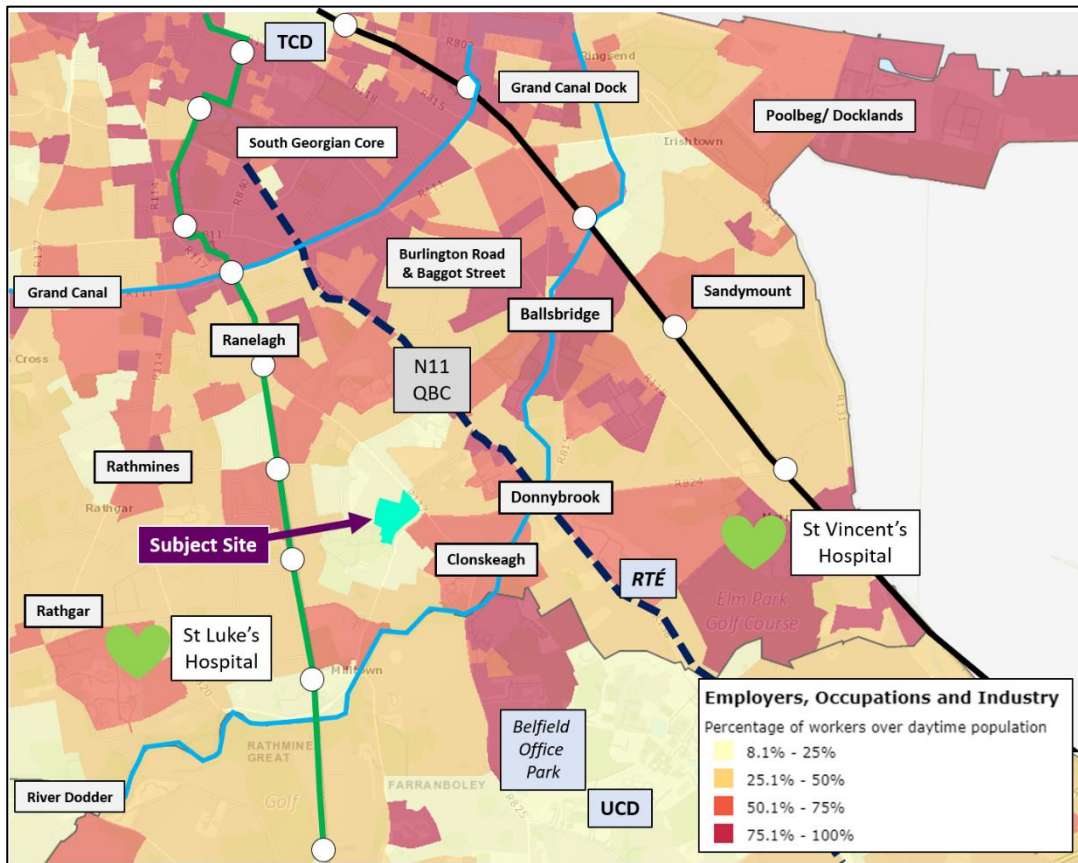


Figure 3.13: Employment Concentration Map with Site Indicatively Annotated

(Source: <http://census.cso.ie/p11map41/>, annotated by Thornton O'Connor Town Planning, 2021)

The Grand Canal area contains a significant volume of employers such as Zendesk EMEA Headquarters, BOI Group HQ, Amazon Ireland, Department of Communications, Marsh Ireland Ltd and AIB Burlington Road etc. which are easily accessible by the Green Line Luas and many bus routes such as the Nos. 44, 61, 46a, 145 and 155, which serve the application site. We note that the Canal Ring is located within reasonable walking distance from the subject lands (c. 7 No. minute cycling distance and c. 25 No. minute walking distance).

The Docklands which contains significant employers such as Google, Facebook, PWC, KBC, Three Ireland, the 3Arena, the Bord Gáis Energy Theatre and the Central Bank of Ireland can be easily accessed by the No. 44 or No. 61 bus route, which serve the application site. The Docklands are also located c. 14-17 No. minutes cycle distance from the subject site.

Harcourt Street, which is within the heart of the central business district of Dublin 2 containing employers such as KPMG Accountants, EY, Byrne Wallace Legal Services can be easily accessed by the Green Line Luas and bus routes such as Nos. 11, 39a, 44, 46a, 61, 145 and 155 and is located c. 10 No. minutes cycling distance and c. 30 No. minutes walking distance from the subject site. In addition, Saint Stephen's Green is located c. 12 No. minutes cycle distance and c. 33 No. minutes walking distance from the site and is also easily accessed by the Luas and bus routes (including Nos. 11, 39a, 44, 46a, 61, 145 and 155).

The nearby Belfield Office Park/Beech Hill Office Campus comprises employers such as the Environmental Protection Agency (EPA), Circle K Head Office, Smurfit Kappa, KSN Construction Consultants and Project Managers and PeoplePoint HRSSC (Irish Civil Service). Belfield Office Park/Beech Hill Office Campus can be accessed by the No. 11 bus or by bicycle or walking (c. 4 No. minutes cycling distance and 13 No. minutes walking distance).

Ballsbridge, which contains the RDS, Zurich, Goodbody, Eirgrid, IBM, Labour Relations Commission, and Facebook (under construction) in addition to hotels, bars and restaurants is located c. 8 No. minutes cycle distance and c. 20 No. minutes walking distance from the subject site.

The No. 11 bus and Green Line Luas provides easy access to the Sandyford Business District (c. 29 minute cycle distance) which contains several large-scale employers such as Microsoft, Vodafone Ireland, SSE Airtricity, and the Beacon Quarter Hotel and Private Hospital, as well as Leopardstown Race Course.

The neighbourhood and district centres in proximity to the site such as Ranelagh, Donnybrook and Rathmines also contain employers such as local convenience and comparison shops, restaurants and bars and in particular the Swan Shopping Centre (c. 6 No. minutes cycling distance and c. 22 No. minutes walking distance) and Central Statistics Office (c. 8 No. minutes cycling distance and c. 25 minutes walking distance) in Rathmines and the RTE studios in Donnybrook (accessed via the No. 39a/46a/145 and 155 bus routes or c. 6 No. minutes cycling distance or 17 No. minutes walking distance).

There are 4 No. hospitals in close proximity to the subject site which are listed below:

Hospitals		
No.	Name	Distance
1	Clonskeagh Hospital	→ c. 450 metres → c. 3 No. minutes cycling distance → c. 6 No. minutes walking distance
2	The Royal Hospital Donnybrook	→ c. 1.4 km → c. 5 No. minutes cycling distance → c. 17 No. minutes walking distance
3	St Vincent's Hospital	→ c. 2.3 km → c. 7 No. minutes cycling distance → c. 26 No. minutes walking distance
4	St Luke's Hospital	→ c. 2.9 km → c. 10 No. minutes cycling distance → c. 37 No. minutes walking distance

In addition, the nearby University College Dublin is one of the largest Universities in the state, with c. 27,000 students (as of 2016/17)¹¹. There is also a workforce of c. 3,300 No. teaching and support staff within the overall college. The UCD Belfield campus spans an area of 133 No. hectares and a number of bus routes pass on either side of the campus. The No. 11 bus route can be utilised from the subject site to easily access the UCD campus. UCD is also located c. 7 No. minutes cycling distance and c. 21 minutes walking distance from the subject site.

¹¹ <https://hea.ie/assets/uploads/2019/10/Institutional-Profiles-2016-17.pdf>

We also note that the Aircoach runs close to the site (Bus Stops No. 773 and 779 - c. 850 No. metres/c. 10 No. minute walk) which provides frequent access Dublin Airport (every 30 minutes). This is an excellent service in close proximity to the subject site to allow residents to easily access the Airport. In addition the City Centre, Stillorgan Village and Sandyford Luas can be accessed by this Aircoach service.

In summary, the subject site is exceptionally well located between a number of important neighbourhood centres at a key cross roads in the inner southern suburbs of Dublin City. The Green Line Luas also afford the opportunity for residents to access employment locations throughout Dublin. Additional connectivity through the surrounding area is provided by local link roads and the River Dodder which is earmarked for upgrade to a high-quality greenway (see Section 3.4.5 below).

The surrounding bus coverage features a number of high-frequency routes into the City Centre and to the Docklands, Ballsbridge and the Sandyford Business District for example.

The proposed Bus Connects programme of investment will see an increase in frequency and capacity surrounding the subject site, with a corridor of 15-minute frequency provided on the Sandford Road into the City Centre (see Section 3.4.5 below for further details).

3.4.5 Improvements to Public Transport

Proposed Bus Connects

In regard to the subject site, the following is the emerging preferred network option that will potentially open the site up for greater access to various parts of the city, increasing employment opportunities and access to local services and amenities.

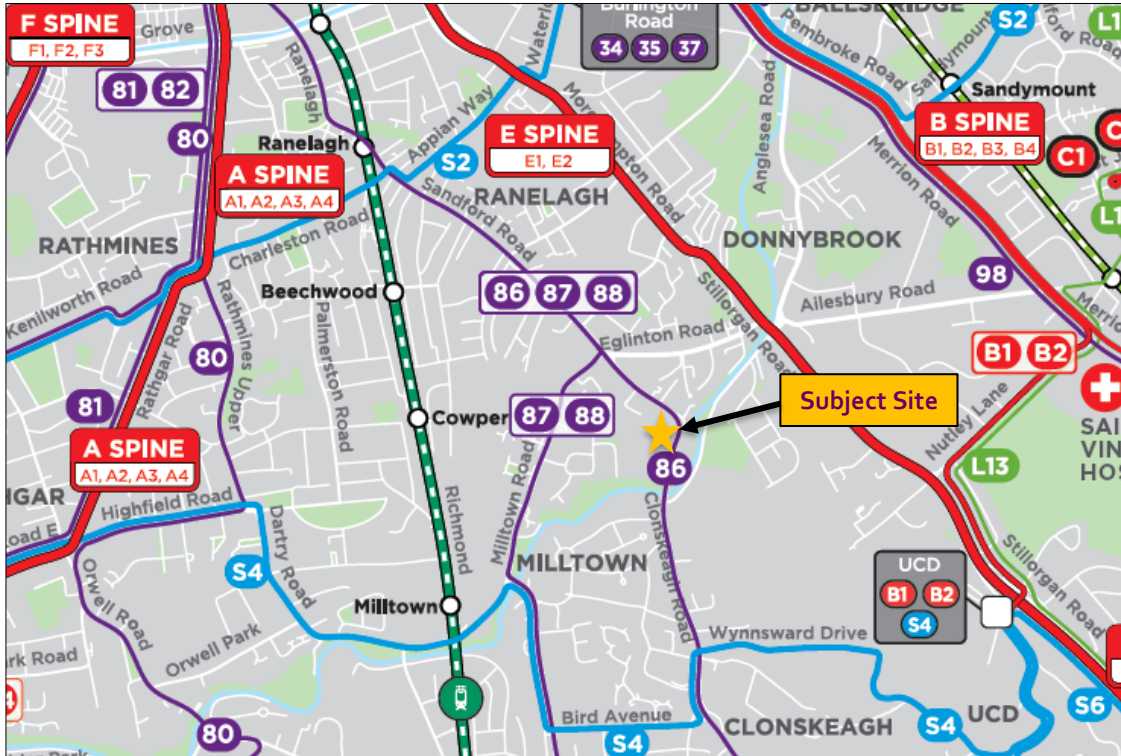


Figure 3.14: Proposed Bus Connects Network Redesign

(Source: BusConnects.ie, 'New Dublin Area Bus Network Summary Document September 2020', annotated by Thornton O'Connor Town Planning, 2021)

As shown in Figure 3.14, the nearest Spine Route is Spine E on the N11 (c. 600 metres away) which provides an all-day frequency of 4 to 10 No. minutes.

The following proposed new routes are of note (Based on Revised Network September 2020):

- **Spine E:** Ballymun-Foxrock Church
 - **Route E1:** Northwood to Ballywaltrim (Every 8 to 10 minutes)
 - **Route E2:** Charlestown to Dún Laoghaire (Every 8 to 10 minutes)
- **Route No. 86:** Ticknock to Mountjoy Square (via Goatstown) (Every 30 minutes)
- **Route No. 87:** Belarmine to Mountjoy Square (via Dundrum) (Every 60 minutes)
- **Route No. 88:** Enniskerry to Mountjoy Square (via Dundrum) (Every 60 minutes)
- **Orbital Route No. S2:** Heuston Station to Poolbeg (Every 15 minutes)
- **Orbital Route No. S4:** Liffey Valley to UCD (Every 10 minutes)

In addition, BusConnects proposes 16 No. core bus corridors which will provide greater bus priority into the city centre. These routes will include upgrades to roads, bus priority measures and segregated or improved cycling facilities. The site is located in proximity to

Core Bus Corridor No. 14 (c. 600 metres) which runs from UCD/Ballsbridge to the City Centre and connects to Core Bus Corridor No. 13 which runs to Bray. This will further improve bus services in the area.

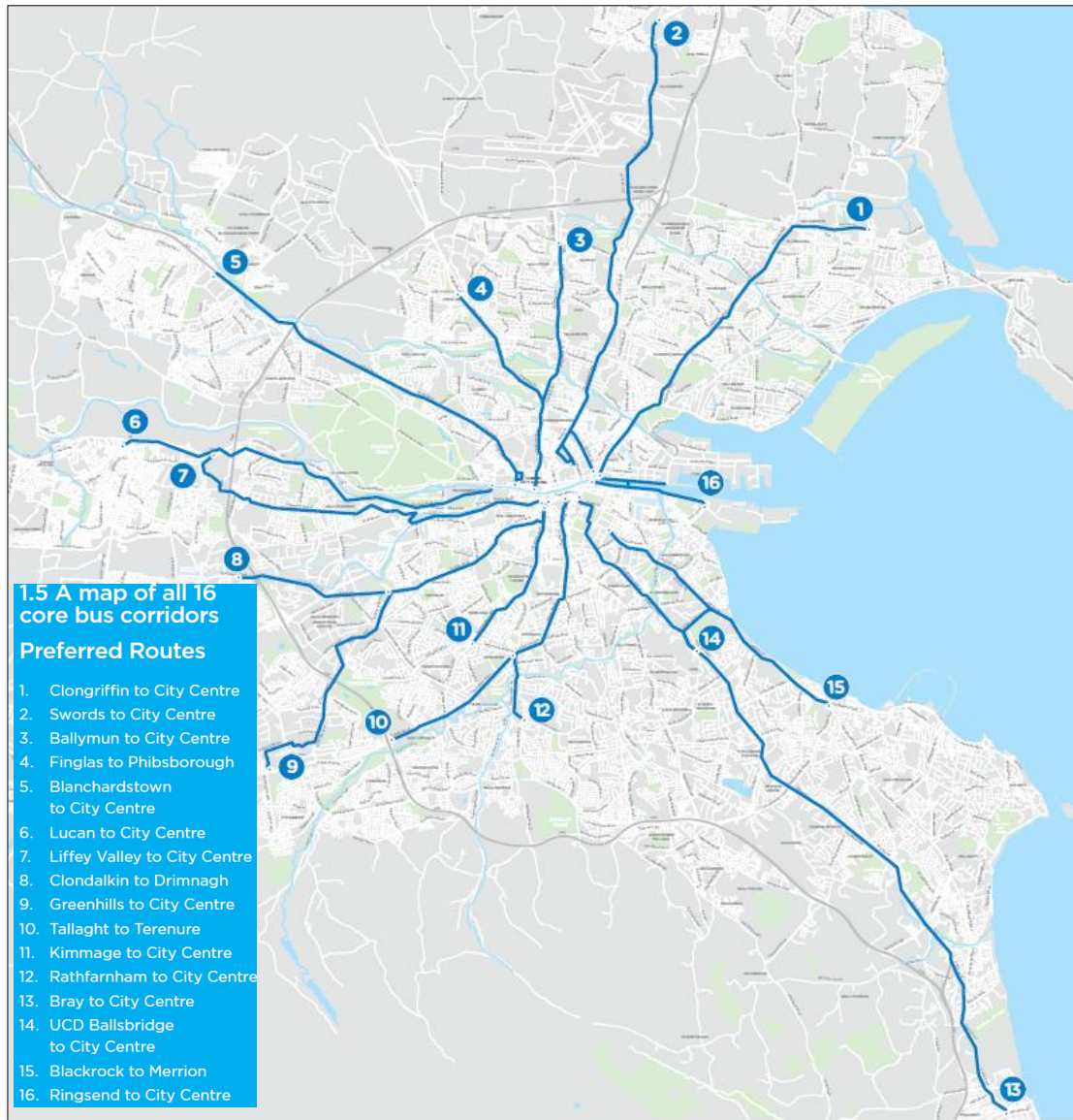


Figure 3.15: Preferred Routes for the 16 No. Core Bus Corridors

(Source: BusConnects.ie [Public Consultation November 2020, annotated by Thornton O'Connor Town Planning, 2021])

Cycle Infrastructure

There is a long-term strategy for the cycle network of Dublin City which is based on existing infrastructure and new planned connections such as greenways and segregated paths. Under the *National Transport Authority's (NTA) Greater Dublin Cycle Network (2013)* there is a plan for a network of cycling infrastructure across the city. This plan has received additional support from the *NPF* and the *National Development Plan 2018-2027*.

Dublin City has a number of cycling facilities including 2 No. bikeshare schemes, and a range of cycling infrastructure. The subject site is directly adjacent a cycle path which provides connections into the City Centre from the southern suburbs. This radial path (Route No. 11) runs from the Sandyford Business District and into the city centre via Clonskeagh and Ranelagh. Although this path is with traffic and shares much of its route with local bus services it is a near continuous path to the Canal Ring/ City Centre.

One nearby successful component of this cycle network is the Grand Canal Greenway from Grand Canal Dock to Portobello. This provides the nearest access to the *Just Eat Dublin Bikes* network, however Ranelagh and Milltown are also served by the *Bleeper Bikes* dockless bike service.

The Bus Connects programme of upgrades will also provide cycling priority paths and segregation along 16 No. radial routes into the city. This will provide additional connections to existing infrastructure and assist in promoting active travel and more hospitable environment to cycling uptake, as well as healthy and sustainable commutes.

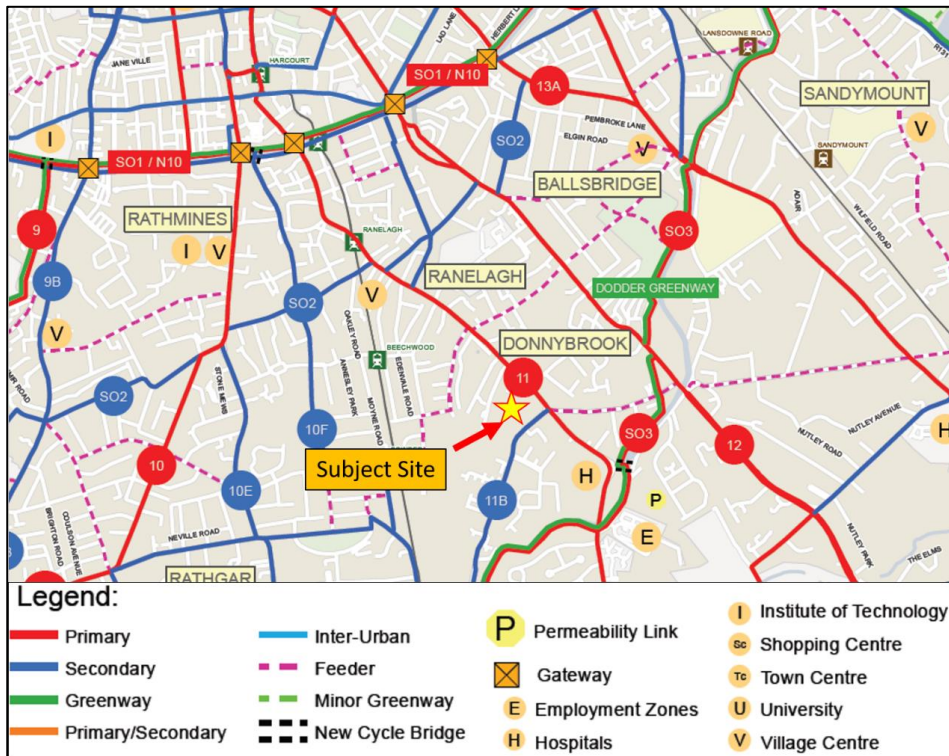


Figure 3.16: Proposed Cycle Network Surrounding the Subject Site

(Source: NTA Cycle Network Plan, 2013, annotated by Thornton O'Connor Town Planning, 2021)

Future River Dodder Greenway

We note that although upgrades to the River Dodder Greenway were proposed as part of the NTA Cycle Network Plan 2013, progress on upgrading the existing paths and connections into a greenway has taken some time with early phases and flood relief works from Ringsend to Ballsbridge providing some improved linkages in recent years.

The connections from Herbert Park to the Orwell Road have been subject to recent (2018) joint consultation between Dublin City Council and Dún Laoghaire-Rathdown County Council. Government and Dublin City funding for the completion of this project has been agreed upon and further progress was expected by 2020¹² (currently no update).

Additionally, components of the greenway are scheduled to connect to the existing cycle network and the Core Bus Corridors under Bus Connects. We note that there is an existing access to the Greenway opposite the Wilde and Greene Café in Milltown south of the subject site.



Figure 3.17: Course of the River Dodder Shared by DCC and DLRCC in Proximity to the Subject Site

(Source: Irish Times, May 2019, annotated by Thornton O’Connor Town Planning, 2021)

3.5 Summary

Having regard to the sustainable location of the site by virtue of its accessibility by walking, cycling and proximity to excellent public transport links which provides easy access to significant employment locations and business districts, it is considered that the subject site is eminently suitable for the proposed development.

In addition, there are a wide range of services, facilities and amenities in close proximity to the subject site, particularly due to the position of the site at the junction of Sandford Road and Milltown Road which acts as a key arterial route between the southern suburbs and Dublin City Centre and as a result is positioned at the centre of many Neighbourhood and District Centres such as Milltown, Donnybrook, Ranelagh, Clonskeagh, Beechwood and Rathmines. The wide range of services, facilities and amenities easily accessible from the subject site include shops, sports clubs, bars, restaurants, cafes, schools, hairdressers,

¹² <https://www.irishtimes.com/news/environment/plans-for-river-dodder-greenway-to-be-revealed-1.3889665>



hospitals, medical centres, doctors, dentists, and parks for example. Therefore, it is clear that the site is well serviced and is suitably located to provide the proposed development.

4.0 PLANNING HISTORY

4.1 Overview of Planning Applications at the Subject Site

There is one live planning application pertaining to a portion of the subject site which was lodged with Dublin City Council on 4th December 2020. In addition, there have been 4 No. previous planning applications pertaining to the subject lands.

4.1.1 DCC Reg. Ref. 3366/20 – Separation Works

The works proposed will essentially separate the lands that are being retained by the Jesuits to the south from the lands within the ownership of the Sandford Living Limited that are being developed as part of this SHD application. The proposed works include the construction of a 2.4 metre high boundary wall.

The 'separation works' application was lodged separately as a condition of sale when the Jesuits' sold the surplus lands to the Applicant. The 'separation works application' includes a request for permission to demolish the Link Building, including the part of the building on the lands the subject of this application for SHD permission. If that application is granted and first implemented, no demolition works to the Link Building will be required under this application for SHD permission. If that application is refused permission or not first implemented, permission is here sought to demolish only that part of the Link Building now existing on the lands the subject of this application for permission and to make good the balance at the red line with a blank wall.

Please see details below:

DCC Reg. Ref.	3866/20
Location:	Milltown Park, Sandford Road, Dublin 6
Application Date:	4 th December 2020
Development Description:	The development will principally consist of the demolition of 83.7 sq m of the 'red brick link building' (single storey over basement) which forms part of the Jesuit Community Buildings and the construction of a new 2.4 metre high boundary wall across the site from east to west. The proposed works to the red brick link building include the following: - the demolition of a 3 no. bay section of facade and a section of roof; - the removal of a section of the internal floor area and provision of new internal stairs; - the removal of the existing 'means of escape' external stairs from the roof; - the construction of a new gable wall and parapet over roof to match existing, - a new external 'means of escape' stairs from roof level and a new security fence to the 'means of escape' stairs. The development will also consist of hard and soft landscaping and all other associated site works (internally and externally) above and below ground.
Decision Date:	5 th February 2021
DCC Decision:	Request for Further Information
Note:	Request for Further Information ("RFI") Response Lodged on 13 th August 2021

A Request for Further Information issued on 5th February 2020 which stated the following:

'1. The proposed development includes the removal of existing mature trees and retention of others in close proximity to the proposed works. With reference to Chapter 16 of the CDP, the following information is required to be submitted in order to enable a full assessment of this element of the proposed works:

- Tree survey
- Tree protection plan
- Arboricultural impact assessment
- Arboricultural method statement.'

In response, CMK Horticulture and Arboriculture Ltd prepared a response which fully responded to the RFI item. This response was lodged on 13th August 2021.

4.1.2 DCC Reg. Ref. 3044/13 / ABP Ref. PL29S.242764 – 'Temporary School Accommodation'

DCC Reg. Ref.	3044/13
Location:	Milltown Park, Sandford Road, Ranelagh, Dublin 6
Application Date:	2 nd August 2013
Development Description:	The erection of single storey temporary school accommodation (1,128 sq m) on the Society of Jesus Lands, Milltown Park, Sandford Road Dublin 6. The development will comprise 9 No. temporary classrooms, principals offices, school office staff room, resource rooms, ancillary accommodation, amendments to existing car parking layout to provide drop off /pick up area and external play area enclosed by 2.1m high palisade fencing and provision of 34 No. replacement car parking spaces, and all associated site development works. Access / egress to/from the temporary school will be via the Sandford Road entrance to Milltown Park Only.
Decision Date:	18 th November 2013
DCC Decision:	Grant Permission Subject to 10 No. Conditions
Note:	Decision of DCC was the subject of a 3 rd Party Appeal to ABP (ABP Ref. PL29S.242764)
ABP Decision:	Granted Permission subject to 6 No. Conditions

Under DCC Reg. Ref. 3044/13, planning permission was sought for the erection of a single storey temporary structure to accommodate a school on the subject site. The proposed development comprised of 9 No. classrooms, ancillary offices and staff facilities. The proposed development also included amendments to the existing car parking layout to provide drop off/pick up area and an external play area enclosed by a 2.1 m high palisade fence, the provision of 34 No. replacement car parking spaces and all associated site development works.

On the 18th November 2013, Dublin City Council decided to Grant Permission for the proposed scheme, subject to 10 No. conditions, including that the permission be for a limited period of 2 No. years from the date of the grant.

In assessing the proposed development, the Planner's Report noted that:

'Having examined the location of the proposed temporary single storey school of the scale proposed, on this large complex, relative to both existing buildings on the site and surrounding development outside the site it is considered that the development would be acceptable. The proposed building is single storey, and there are very large separation distances from it and neighbouring properties. It would not impinge on the amenities of properties surrounding the site and the traffic management proposals are acceptable to Roads and Traffic Planning.'

The decision of Dublin City Council was the subject of a Third-Party Appeal to An Bord Pleanála (ABP Ref. PL29S.242764).

The Board ultimately decided to Grant Permission for the proposed scheme, subject to 6 No. conditions. The permission was valid for a period of two years from the date of the decision and expired on 26th March 2016.

4.2 Applications to Extend the Duration of Development Permitted Under DCC Reg. Ref. 3044/13 / ABP Ref. PL29S.242764

4.2.1 DCC Reg. Ref. 2673/16 / ABP Ref. PL29S.246869 – 'Extension of Duration'

Under DCC Reg. Ref. 2673/16 / ABP Ref. PL29S.246869 permission was sought for the extension of the duration of the development permitted under DCC Reg. Ref. 3044/13 / ABP Ref. PL29S.242764. The proposed development would result in the reduction of the number of classrooms from 9 No. to 5 No. reducing the overall footprint from 1,128 sq m to 745 sq m. All other ancillary development including the external play area and drop off/pick-up area remained unaltered.

On the 8th June 2016, Dublin City Council decided to Grant Permission for the proposed development, subject to 5 No. conditions.

The decision of the Planning Authority was the subject of a Third-Party Appeal to An Bord Pleanála (ABP Ref. PL29S.246869).

The Board ultimately decided to Grant Permission to the proposed development subject to 5 No. conditions. One of the conditions attached to the permission stated that the permission shall apply until the 1st September 2018.

4.2.2 DCC Reg. Ref. 3913/18 – 'Further Extension of Duration'

On the 10th September 2018, under DCC Reg. Ref. 3913/18 permission was sought for the Extension of Duration of the previously permitted development (DCC Reg. Ref. 2673/16 / ABP Ref. PL29S.246869) until the 31st August 2019. The number of classrooms and overall footprint of the building remained unchanged.

On 2nd November 2018, Dublin City Council decided to Grant Permission for the proposed development, subject to 3 No. conditions. One of the conditions attached to the permission

required that the use of the site and associated structures shall cease on 31st August 2019 and that the structures shall be removed and land returned to its former state prior to this date.

This temporary primary school at the north-western corner of the subject site was removed from the subject site when the permission expired in August 2019 and the upgrade works of St. Mary's National School on Belmont Avenue were completed.

4.3 Application Pertaining to Boundary Wall to the South (Redline Overlaps with the Subject Redline Boundary)

DCC Reg. Ref.	4333/15
Location:	Milltown Park, Ranelagh, Dublin 6
Application Date:	23 rd December 2015
Development Description:	The development will consist of the demolition of the existing boundary wall and sliding gate at the side entrance to Milltown Park on Milltown Road Dublin 6 and its replacement with a new boundary wall consisting of a low level plinth wall with railings over and new set back entrance with both pedestrian and traffic gates together with new signage, associated landscaping and parking reconfiguration.
Decision Date:	25 th February 2016
DCC Decision:	Grant Permission Subject to 4 No. Conditions
Note:	This grant of permission provides access to remaining Jesuit lands with a new access proposed on Milltown Road for the subject development.

This permission established a separate access for the remaining Jesuit lands, which the Jesuits will continue to use to access their lands when the wall is provided (see Figure 4.1 below).



Figure 4.1: Image of the Milltown Road Entrance to the Jesuit Lands

(Source: Google Maps, 2021)



Figure 4.2: Map Demonstrating Indicative Location of the New Jesuit’s Milltown Road Entrance – Yellow Star

(Source: Google Maps, annotated by Thornton O’Connor Town Planning, 2021)

4.4 Other Planning Applications on the Retained Jesuit Lands

DCC Reg. Ref.	2824/13
Application Date:	26 th June 2013
Development Description:	Development of the Cherryfield Avenue entrance. The development will consist of demolition and widening of the existing gated vehicular entrance including aligning the entrance with the existing road of Cherryfield Avenue and the construction of a new pedestrian access gate. To include the construction of new gate piers, new gates and all associated works.
Decision Date:	10 th March 2014 [Final Grant 22 nd April 2014]
DCC Decision:	Grant Permission Subject to 5 No. Conditions

DCC Reg. Ref.	3052/11
Application Date:	27 th July 2011
Development Description:	The development will consist of a 92 sq m single storey extension to the south facing facade of the Cherryfield Nursing Home, with a green flat roof, 2 No. roof lights, demolition of pergola and all associated site works and landscaping.

Decision Date:	20 th September 2011 [Final Grant 4 th November 2011]
DCC Decision:	Grant Permission Subject to 7 No. Conditions

DCC Reg. Ref.	4775/07
Application Date:	10 th August 2007
Development Description:	Amendments to existing planning permission (Ref: 5393/06 and An Bord Pleanála Ref: PL29S.221293), to include revisions to the north facade of the new residential accommodation building, an increase in overall area from 3,930 sq m to 4,076 sq m, the addition of rooflights and two new first floor en-suite bedrooms to the proposed new nursing home. The overall height of the new nursing home is to be increased from 6.3m to 7.35m and the height of the new residential accommodation building is to be increased from 12.3m to 12.75m.
Decision Date:	2 nd October 2007 [Final Grant 15 th November 2007]
DCC Decision:	Grant Permission Subject to 5 No. Conditions

DCC Reg. Ref.	5393/06 [ABP Reg. Ref. PL29S.221293]
Application Date:	4 th October 2006
Development Description:	Demolition of the existing 980 sq m single storey Cherryfield Nursing Home and the development of a new 1,448.82 sq m two storey Nursing Home and a 2,481.74 sq m four storey accommodation building for the Jesuit Community, part demolition to widen and reinstatement of the gated entrance on Milltown Road.
Decision Date:	28 th November 2006 [Final Grant/An Bord Pleanála Decision Date 23 rd May 2007]
DCC Decision:	Grant Permission Subject to 8 No. Conditions

4.5 Relevant Planning Applications on Lands Zoned Z15

This section reviews development on similar Z15 zoned lands in Dublin City demonstrating that significant residential developments have been provided on other Z15 sites.

4.5.1 DCC Reg. Ref. / ABP Ref. PL29S.234927– ‘Marianella, Rathgar-Parent Permission’

DCC Reg. Ref.	2186/09 [ABP Reg. Ref. PL29S.234927]
Location:	Former Monastery Lands, Marianella, 75 Orwell Road, Rathgar, Dublin 6
Application Date:	29 th January 2009
Development Description:	The proposed development will utilise the existing southern access to the Marianella site. The proposed development consists of the following: (i) The demolition of all existing buildings on the site, including the existing Monastery building and all associated buildings on the site; (ii) The construction of a total of 12 No. 5 bedroom three storey semi-detached houses (referred to as Block G) with a total height of 12.26 metres, each with a gross floor area

	of 254sqm, to the south of the site; (iii) the construction of 263 No. residential apartments in 6 No. blocks (A to F), ranging in height from 4 storeys (total height 12.6 metres) to 7 storeys (total height of 23.25 metres) over basement level, comprising of 31 No. one bedroom units, 178 No. 2 bedroom units and 54 No. 3 bedroom units. The provision of a publicly accessible hard and soft landscaped park to the west of the application site, comprising of 5,985sqm (1.48acres), including the demolition of the existing boundary wall to Orwell Road and its replacement with a combination of railing (2.1 metres in height from ground level) and low wall. The proposed public park comprises 25% of the total site area; (v) An additional area of open space (418 sq m) is located to the south of the proposed southern entrance road from Orwell Road.
DCC Decision:	Grant Permission subject to 28 No. conditions
DCC Decision Date:	3 rd September 2009
Note:	Decision of DCC was the subject of a 3 rd party appeal to An Bord Pleanála
Final ABP Decision:	Grant Permission subject to 20 No. conditions

Under DCC Reg. Ref. 2186/09, permission was sought for a residential development consisting of the demolition of the existing monastery complex and associated buildings and the construction of 263 No. apartments and 12 No. houses with associated ancillary development.

On the 3rd September 2009, Dublin City Council decided to Grant Permission for the proposed development subject to 28 No. conditions.

The decision of the Planning Authority was the subject of a third-party appeal to An Bord Pleanála.

The Board ultimately decided to Grant Permission for the proposed development subject to 20 No. conditions demonstrating that the Planning Authority and An Bord Pleanála were in favour of providing residential development at the subject Marianella lands.

4.5.2 ABP Ref. PL29S.303133 - 'Marianella, Rathgar - Apartments Application'

ABP Reg. Ref.	PL29S.303133
Location:	Former Monastery Lands, Marianella, 75 Orwell Road, Rathgar, Dublin 6
Application Date:	30 th November 2018
Development Description:	A Strategic Housing Development consisting of the construction of 107 No. residential units in 2 No. apartment blocks. Block F will be 6 No. storeys in height and will comprise of 68 No. units in total. Block G will be 5 No. storeys in height and will comprise 39 No. units in total. The proposed development will also include concierge services, a gym, changing facilities, a meeting room, plant and resident storage. The proposed development includes the provision of 26.9% public open space, 72 No. car parking

	spaces, 164 No. bicycle parking spaces, an ESB Substation, bin storage and all ancillary development works necessary to facilitate the development.
Decision Date:	12 th March 2019
ABP Decision	Grant Permission Subject to 21 No. Conditions
Note:	Decision of ABP was the subject of a Judicial Review.
Final ABP Decision:	Grant Permission

Under ABP Ref. PL29S.303133, permission was sought for 107 No. residential units on lands zoned Z15. The proposed units were located in 2 No. apartment blocks ranging in height from 5 No. to 6 No. storeys. The proposed development formed part of an existing residential development adjacent to the subject site known as 'Marianella'.

In relation to the appropriateness of residential development on the subject site, the Inspector's Report noted that:

'I am of the opinion that given its zoning, the delivery of residential development on this prime, underutilised site, in compact form comprising well-designed, higher density units would be consistent with policies and intended outcomes of current Government policy. The site is considered to be located in a central and accessible location, it is within easy walking distance of good quality public transport in an existing serviced area.'

In relation to the potential impact on the surrounding residential amenity, the Inspector's Report noted that:

*'I have examined all of the documentation before me and it is acknowledged that the proposal will result in a change in outlook for some of the local residents, as the site changes from an undeveloped piece of land to a site accommodating development of the nature and scale proposed. Given the location of the site, I do not consider this change to be a negative. **This is an undeveloped piece of serviceable land, where residential development is open for consideration.**'* [Our Emphasis]

The Board ultimately decided to Grant Permission for the proposed development subject to 21 No. conditions.

4.5.3 DCC Reg. Ref. 2991/15 / ABP Ref. PL29N.245745 – 'St Joseph's, Grace Park Road, Drumcondra, Dublin 9'

DCC Reg. Ref.	2991/15
Location:	Lands at St. Joseph's Grace Park Road, Drumcondra, Dublin 9
Application Date:	12 th June 2015
Development Description:	The development will consist of 166 No. dwellings (125 No. Houses and 41 No. apartments), a crèche facility (c.234 sq m) plus associated outdoor play area and a public park of c.1.04 Ha including children's playground. The development comprises of 12 No. 3-storey 5 Bed terraced houses; 35 No. 2-storey 4-Bed houses (6 No. detached and 29 No. mid or end of terrace) - 17 No. applied for with the option of a fifth bedroom at attic level

	<p>served by a dormer window in the front elevation (House Type T2); 78 No. 2-storey 3-Bed houses (all mid or end of terrace) - 32 No. applied for with the option of a single storey family room rear extension and a fourth bedroom at attic level served by a dormer window in the front elevation (House Type T1) and 19 No. Applied for with the option of a single storey family room rear extension (House Type T3 & T4) and 11 No. with integrated garage (House Type T5); 36 No. 2-Bed apartments and 5 No.1-Bed apartments each served by a balcony/ terrace accommodated in 4 No. 4-storey buildings with setback penthouse level. All houses and apartments have solar panels provided at roof level. The proposed development is served by a total of 288 No. surface car parking spaces in a variety of on-curtilage and on-street conditions, including 3 No. dedicated crèche car parking spaces, 27 No. dedicated ChildVision car parking spaces as well as 41 No. bicycle parking spaces for the apartments; a new vehicular entrance off Grace Park Road with the existing entrance (gates and piers part of a Protected Structure) to continue to provide vehicular access to the existing gate lodge only (part of a Protected Structure) and pedestrian and cycle access to the new public park and residential development. the proposed development involves the demolition of Gentili House (c.393 sq m) which adjoins Drumcondra Castle (a Protected Structure) and Rosmini House (c.394 sq m) and all associated and ancillary site development and landscape works including ESB substation (19 sq m). Residential development and landscaping works will take place on a site of c.4.97 Ha. Permission is also sought for the laying of a new surface water sewer and foul sewer connection across the adjoining St. Vincent's Hospital lands to the southwest of the site within a corridor c.0.57 Ha extending south to Richmond Road.</p>
Decision Date:	20 th October 2015
DCC Decision:	Grant Permission subject to 25 No. conditions
Note:	Decision of DCC was the subject of a First-Party and Third-Party Appeal to An Bord Pleanála.
ABP Decision	Grant Permission subject to 17 No. conditions.

In assessing the proposed development in the context of existing Protected Structures on the subject site, the Inspector's Report noted that:

'It is regrettable that the proposed development has chosen not to integrate with and acknowledge the rich and varied buildings to be retained on site. It is considered the proposed development is not in accordance with policy QH6 of the Development Plan which seeks to promote the development of underutilised infill sites and to favourably consider higher density proposals which respect the design of the surrounding development and character of the area. Nor is the proposed development in accordance with policy NC2 of the Development Plan which seeks to promote neighbourhood developments which build on local character as expressed in historic activities or buildings, materials, housing types or local landscapes.'

In deciding not to accept the Inspector’s recommendation to Refuse Permission the Board considered that:

‘Subject to the amendments of the layout consequent to the conditions attached, the proposed development would protect the architectural character and setting of Drumcondra Castle and surrounding buildings and would conform, to the provisions of the Development Plan in relation to the quantum of open space required in the Z15 zoning area. The Board further considered that the amendments would satisfy the concerns of the Inspector with regard to open space provisions, permeability and layout and would protect the residential and visual amenities of the area and would, therefore be in accordance with the proper planning and sustainable development of the area.’

The Board ultimately decided to Grant Permission for the proposed development subject to 17 No. conditions.

Amongst the conditions was one which required the omission of 2 No. apartments blocks to release an area of the site to be included in the public open space provision to hit the 25% requirement as prescribed under the Z15 zoning objective.

In the context of the proposed scheme, the subject application both retains the buildings on site that can be successfully and viably integrated into the subject site (albeit none are Protected) and provides 34.9% public open space, significantly exceeding the 25% required (as well as provided 12.8% communal open space, overall providing 47.7% open space on site).

4.5.4 DCC Reg. Ref. 4105/15 / ABP Ref. PL29S.246430 – ‘Carmelite Convent, Griffith Avenue, Gracepark Road, Dublin 9’

DCC Reg. Ref.	4105/15
Location:	Lands at Former Carmelite Convent of the Incarnation, Hampton Grace Park Road and Griffith Avenue, Drumcondra, Dublin 9
Application Date:	26 th November 2015
Development Description:	The development will consist of the provision of a total of 101 No. residential units, the part change of use and part conversion of existing Protected Structure and a new residential nursing home. The development comprises: (1) The demolition of existing 1 No. gate lodge dwelling 1 No. existing outbuilding / shed, and parts of Protected Structure; (2) The part change of use and part conversion of the existing 2-3 storey Protected Structure from convent to residential use with existing church to be retained in full. Internal and external alterations / modifications to existing Protected Structure are also proposed to accommodate residential use. The Protected Structure will now comprise institutional / ecclesiastical and community use on ground, first and second floor with the remaining structure comprising 6 No. apartments (2 No. 1 bed, 2 No. 2 bed & 2 No. 3 bed units) and 3 No. 3 bed, 2 storey terraced dwellings. The existing 1 No. detached 2

	<p>bed bungalow associated with Protected Structure, part of walled garden and burial ground are to be retained with new wall to be constructed around burial ground. Alterations to boundary of walled garden are also proposed. (3) The construction of 55 No. residential dwellings as follows; 8 No. semidetached 3 storey (2 No. 4 bed & 6 No. 5 bed) dwellings, 47 No. terraced 3 storey (16 No. 4 bed & 31 No. 5 bed) dwellings; (4) The construction of 2 No. apartment blocks as follows- Block A - 3 storey with underground basement car park providing for 16 No. units (2 No. 1 bed apartment units 12 No. 2 bed apartment units and 2 No. 3 bed apartment duplex units) all with balconies; Block B- 4storey with underground basement car park providing for 20 No. units (2 No. 1 bed units, 16 No. 2 bed units & 2 No. 3 bed units) all with balconies; (5) The construction of a 4 storey, 69 bedroom residential nursing home with roof garden and associated ancillary / common facilities and office / administration areas; (6) The construction of 2 No. basement car parks - 1 No. serving apartment Block B and nursing home comprising 64 No. car parking spaces (30 No. designated for residential use and 34 No. spaces for nursing home) and 32 No. bicycle spaces, and 1 No. serving apartment Block A and units within existing Protected Structure comprising 35 No. car parking spaces and 22 No. bicycle spaces. 113 No. surface car parking spaces to serve dwellings. 6 No. surface visitor car parking spaces to serve institutional / ecclesiastical and community use (total No. of spaces - 226); (7) Construction of 2 No. new vehicular and pedestrian access points on Grace Park Road with existing entrance to be closed. The provision for a new pedestrian / cyclist entrance onto Griffith Avenue; (8) 1 No. esb substation; (9) Boundary treatments including partial removal of boundary wall along Grace Park Road to provide sightlines and footpath, removal of later additions of boundary wall on Grace Park Road and Griffith Avenue with the existing stone / brick to be reused within development and the relocation of existing piers and gate for reuse within development; (10) Landscaping (including playground), engineering and all site development works necessary to facilitate the development.</p>
Decision Date:	18 th March 2016
DCC Decision:	Grant Permission subject to 25 No. conditions
Note:	Decision of DCC was the subject of a Third-Party Appeal to An Bord Pleanála.
ABP Decision	Grant Permission subject to 26 No. conditions.

In assessing the principle of residential development of lands zoned Z15 the Inspector's Report noted that:

'It appears that the last use on these lands, and one that existed from the mid C.19th, was a convent/monastic use, there was no primary or secondary educational use or health institutional use as such. Therefore, the proposed development is not displacing such educational or health use, nor is a recreational or community use being displaced by the development proposal.'

The Board ultimately decided to Grant Permission for the proposed development subject to 26 No. conditions. Similar to the comments of the Inspector above, the proposed development is not displacing any active Institutional uses on the site. Rather it is using a vacant site that had a very specific Institutional use that is no longer required.

4.6 Recent Application for Increased Height on a Corner Site in the Vicinity

DCC Reg. Ref.	3047/18 [ABP Reg. Ref. PL29S.303708]
Location:	Site located at Nos. 1, 3, 5, 7, 9 and 11, Eglinton Road, Donnybrook, Dublin 4
Application Date:	18 th May 2018
Development Description:	Planning permission for a residential development of 94 No. apartments (and a ground floor cafe of c. 67 sq m) all on a c. 0.38 hectare site. The proposed development will consist of: 1) Demolition of existing 6 No. two storey dwellings and ancillary structures; 2) Construction of a residential development of 94 No. apartment comprising 15 No. 1 bedroom apartments, 62 No. 2 bedroom apartments and 17 No. 3 bedroom apartments (all apartments to have balconies or roof terraces), with an overall height of 7 storeys (over basement/part second basement level) at junction of Eglinton Road and Donnybrook Road, reducing in height to 5 and 4 storeys along Eglinton Road and (5-7 storeys) along Donnybrook Road, and 3 storeys along Brookvale Road. 3) Provision of ancillary areas (residents meeting room/lounge with terrace, management area) at ground floor level; 4) Ground floor cafe of c. 67 sq m at ground floor level onto Donnybrook Road with terrace and signage zone of c. 2 sq m); 5) Vehicular access will be provided from Brookvale Road into basement levels which will provide 100 No. car parking spaces (including car stacker system), 5 No. motorcycle spaces and 94 No. cycle spaces and all ancillary areas (to include plant, storage and attenuation); 6) The development includes all associated site development works, hard and soft landscaping (to include 20 No. cycle spaces at ground floor level) and all other ancillary works to include provision of an internal communal landscaped open space area at ground floor and deck area at fourth floor level on western boundary; 7) Provision of hoarding around site boundary (with scheme advertisement zone c. 302.25 sq m along Eglinton Road and Donnybrook Road) during construction phase
DCC Decision:	Grant Permission subject to 18 No. conditions
DCC Decision Date:	22 nd January 2019
Note:	Decision of DCC was the subject of 3 rd party appeals to An Bord Pleanála
Final ABP Decision:	Grant Permission on 11 th June 2019 subject to 18 No. conditions

The lands on Eglinton Road and the subject lands at Sandford Road are both corner sites fronting prominent junctions, at each end of Eglinton Road. Please see Figure 4.3 below for the location of the Eglinton Road site in proximity to the subject site.



Figure 4.3: Location of DCC Reg. Ref. 3047/18 [ABP Reg. Ref. PL29S.303708] (Orange Star) in Proximity to the Subject Lands at Sandford Road (Red Star)

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2021)

The An Bord Pleanála Inspector noted the following in relation to the granted 4 to 7 No. storey residential development:

'The location of the site at a junction and along Donnybrook Road, which is defined by a wide and busy public road means overall visual impact of the proposal would not be a negative one...I would reiterate that the location of the site at the junction of Donnybrook Road and Eglinton Road lends itself to a structure of increased bulk and scale such as this and that wider views of the proposal are satisfactory.'

The Inspector further noted that the site:

'is located on a larger triangular shaped block of development defined by the three public roads...Its location with significant frontage along Donnybrook Road, detached from the village and at a junction would allow for a building of significant scale.'

The Inspector's assessment of the scheme therefore concluded that the increase in height was acceptable on the corner site bound by public roads on 3 No. sides and fronting a junction. We note that the Eglinton Road site is 0.38 Ha in size whereas the developable size of the subject Sandford Road site is c. 4.26 Ha., which is significantly larger. The subject site at Sandford Road is bound by public roads on 2 No. sides and also fronts a significant road junction. Therefore, as increased height has been accepted on a smaller corner site in the vicinity of the subject site, which was granted prior to the introduction of the *Building Height Guidelines*, it is considered acceptable to provide increased heights (principally ranging from part 2 to part 10 No. storeys) at the site.

Subsequent to this grant of permission at the Eglinton Road site, a Strategic Housing Development Planning Application was lodged on 2nd June 2020 for 148 No. apartments ranging in height from 4 to 12 No. storeys replacing the earlier scheme as detailed below:

ABP Reg. Ref.	PL29S.307267
----------------------	---------------------

Location:	Site located at Nos. 1, 3, 5, 7, 9 and 11, Eglinton Road, Donnybrook, Dublin 4
Application Date:	2 nd June 2020
Development Description:	<p>The proposed development will consist of:</p> <ol style="list-style-type: none"> 1) Demolition of existing 6 No. two storey dwellings and ancillary structures at No. 1, 3, 5, 7, 9 and 11 Eglinton Road; 2) Construction of a residential development of 148 No. apartment units comprising 71 No. 1 bedroom units, 58 No. 2 bedroom units, 9 No. 2 bedroom duplex units, and 10 No. 3 bedroom units; 3) The height of the proposed development ranges from 3 to 4 storeys along Brookvale Road, 5 to 12 storeys along Donnybrook Road, 4 to 12 storeys along Eglinton Road, including a double height feature at 12th storey level at the junction of Eglinton Road and Donnybrook Road, with a maximum overall height of 43.1 metres over existing ground level; 4) Provision of private open space to serve all residential units in the form of balconies or terraces; 5) Provision of ancillary residential communal areas including external central landscaped courtyard, internal resident amenities spaces at ground floor level including residents lounge, co-working space, gym, management area and bicycle store with 28 No. spaces and at seventh floor level including cinema room, reading room, and 2 No. rooftop terraces located on the north and south elevations; 6) Provision of basement including 75 No. car parking spaces, 4 No. motorcycle spaces and 172 No. cycle spaces and all ancillary areas such as plant, storage and attenuation; 7) Vehicular access will be provided from Brookvale Road; 8) The development includes all associated site development works, hard and soft landscaping (to include 4 no. cycle spaces at street level) SUDS drainage, PV panels on roof of 12th storey, provision of hoarding around site boundary (with scheme advertisement zone c. 302.25 sq m along Eglinton Road and Donnybrook Road) during construction phase, ESB substation and all other ancillary works necessary to facilitate the development;
ABP Decision:	Grant Permission subject to 28 No. conditions
DCC Decision Date:	31 st August 2020

The An Bord Pleanála Inspector noted the following in relation to the SHD application in relation to the progression of National Policy:

'I also note that the evolution of national policy which supports the increased scale of residential buildings in appropriate locations and that this will invariably mean that residential buildings become more prominent structures in the townscape. The tallest part of the proposed development is located on the south east corner of the site, opposite a commercial building to the south and the stadium to the east, focusing height away from the more sensitive residential properties to the west and south west. I consider that the site is therefore appropriate for a building of increased height and scale, forming

a landmark at this intersection for Donnybrook on the edge of the city centre'. [Our Emphasis]

Furthermore, the ABP Inspector noted the following in relation to building heights:

'I recognise that the construction of the proposed development on the site represents a significant change in scale for the area at this end of Eglinton Road. However, I am also mindful of the approach taken in the Building Height Guidelines which identifies that increased building height has a critical role to play in addressing the delivery of more compact growth in urban areas. While the existing scale surrounding the site is largely 2-3 storey, this is reminiscent of traditional, limited, low-rise building heights (as described in the guidelines) which is limiting the growth and development need of the city. I recognise the surrounding sensitivities for this site, including more historical settings in the nearby conservation areas and for Protected Structures, however the immediate vicinity of the site at this end of Eglinton Road, does not exhibit these same sensitivities and the quality of design ensures that the proposed development will be a positive addition to the streetscape and in views from more sensitive areas around the site'. [Our Emphasis]

In relation to density the ABP Inspector stated:

'The proposed density is 385 units per hectare. This is increased from the approved development on the site which has a density of 244 units per hectare. Policy at national, regional and local level encourages higher densities in appropriate locations. Project Ireland 2040: National Planning Framework (NPF) promotes the principle of 'compact growth'. Of relevance, objectives 27, 33 and 35 of the NPF which prioritise the provision of new homes at locations that can support sustainable development encouraging increased densities in settlements where appropriate.

The site is a short walk (less than 15 minutes) to surrounding employment centres (RTE Campus / Beech Hill Office Campus / Ballsbridge). The site is also approximately 1,380m from Sandymount DART, equivalent to a 17 minute walk from the site and in my view, a reasonable walking distance. The proposed development is also located along a public transport corridor with an existing Quality Bus Corridor (QBC) running along Donnybrook Road. The nearest bus stop is located along the road frontage on the site on Donnybrook Road. As such, I consider that the site can be described as a central / accessible location as defined under the Apartment Guidelines and sustainably support the increased density level proposed.'

Therefore, having regard to the recent grant of permission at the Eglinton Road site, we consider that the proposed development ranging in height from 2 No. 10 No. storeys at a large site at the corner of Sandford Road and Milltown Road providing a density of 157.5 No. units per hectare in proximity to public transport, employment locations, services and facilities, is an appropriate development on these sustainable and well serviced lands.

4.7 Other Planning Applications in the Vicinity Granted or Seeking Permission

In addition to the Eglinton Road site discussed in Section 4.6 above, we note the following relevant applications which have either been granted permission or are currently seeking

planning permission in the vicinity which demonstrates the suitability of the area to provide increased height and density.

No.	Reg. Ref.	Address	Application Date	Summary of Development	Decision/Decision Due
1.	3513/20 (ABP Ref. PL29S.309720)	Nos. 25-27 Donnybrook Road and Nos. 1-3 The Crescent, Donnybrook	7 th October 2020	49 No. BTR units and Retail unit (8 No. storeys applied for and 7 No. storeys granted by DCC).	Granted by DCC on 24 th February 2021 [Final Grant Date 26 th May 2021]
2.	3301/20 (ABP Ref. PL29S.309378)	Nos. 22-24 Donnybrook Road (Former Kiely's Public House), Donnybrook	2 nd September 2020	100 No. Shared Living Units and Café/Restaurant (part 3 to part 7 No. storeys). 4 No. units omitted via DCC condition.	Granted by DCC on 13 th January 2021 and currently on Appeal to ABP
3.	2189/20 (ABP Ref. PL29S.307375)	Sandford Lodge, Sandford Close	3 rd February 2020	36 No. units over 3 No. storeys.	Granted by DCC (27 th March 2020) and ABP (11 th March 2021)
4.	2115/19	Alexandra College	24 th January 2019	203 No. student accommodation bedspaces (part 3 to part 4 No. storeys)	Granted by DCC on 20 th March 2019 [Final Grant Date 25 th April 2019]

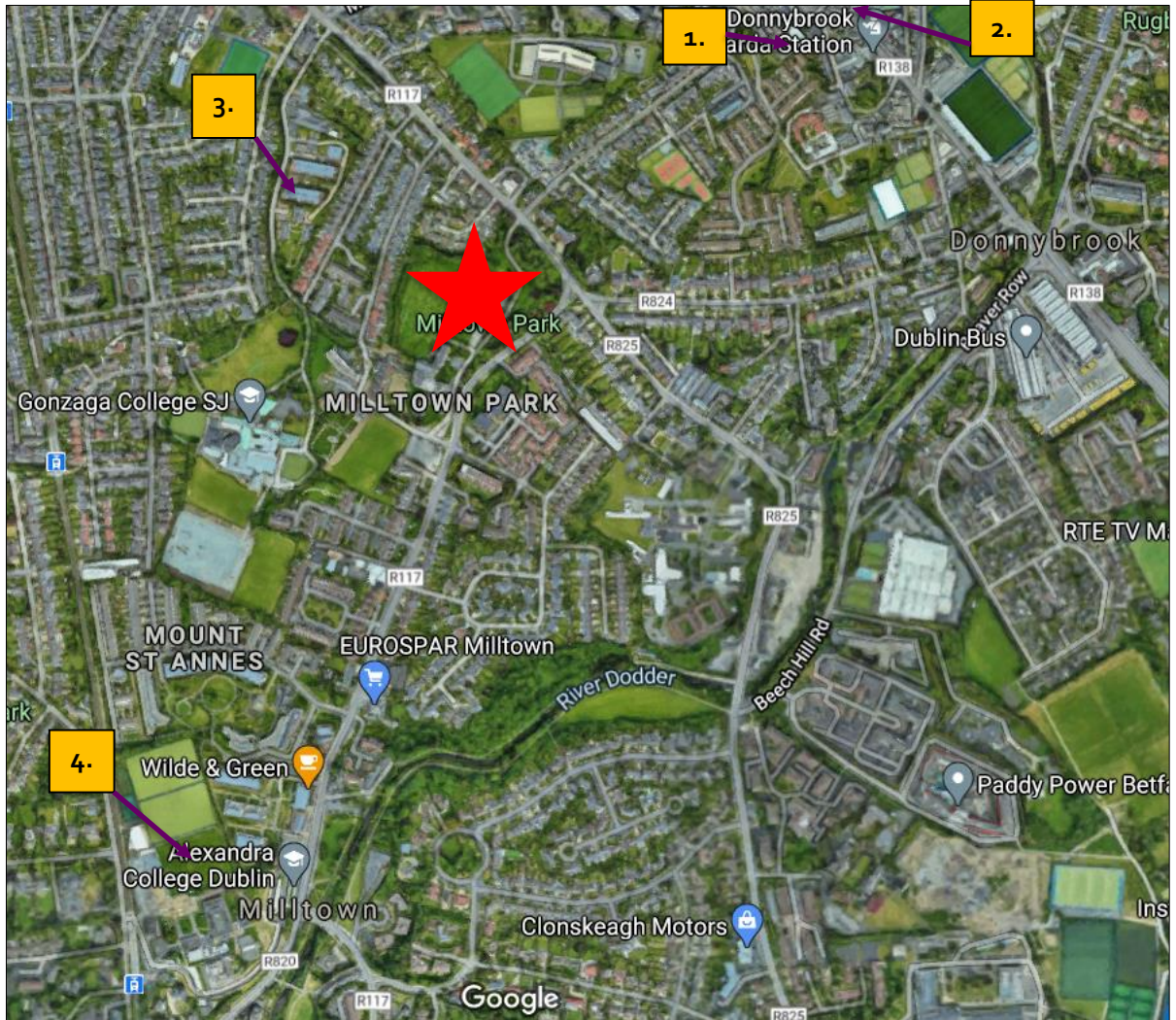


Figure 4.4: Map Demonstrating Proximate Planning Applications Either Granted Permission or Currently Seeking Planning Permission in the Vicinity [Subject Application Site Indicatively Annotated by the Red Star]

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2021)

4.8 Analysis of Planning History

It is clear from the planning history that there is precedence for the granting of permission for substantial residential developments on lands zoned Z15. The letter received from William Callahan SJ, Rector of the Jesuit Community in respect of the subject application demonstrates that planning application lands are surplus to the Jesuits Community requirements due to a decline in vocations and are no longer required by the Jesuits for the purposes of its function and mission. The Planning History has demonstrated that back in 2016 permission was received by the Jesuits to provide a separate entrance into what is now their remaining lands ensuring it remains functionally separate from the development lands subject to the current application.

The development permitted under ABP Ref. PL29S.303133 at Marianella, No. 75 Orwell Road, Rathgar is of particular relevance to the subject site. The site location and zoning, proximity to public transport, surrounding context and proximity to existing low density



residential dwellings are all similar to the subject site. It is notable that the Inspector considered the development of a residential scheme on lands zoned Z15 to be acceptable and that the development of underutilised serviced land within the surrounding context of residential units is appropriate. In the Carmelite Convent development (DCC Reg. Ref. 4105/15 / ABP Ref. PL29S.246430), permission was granted for a residential development with the Inspector noting that the proposed development is not displacing any active Institutional uses on the site. Rather it is using a vacant site that had a very specific Institutional use that is no longer required.

In addition, permission has been recently granted in the vicinity for developments providing increased height and density which confirms that the area is transitioning, and that the subject lands are suitable to accommodate the proposed development.

5.0 PROPOSED DEVELOPMENT IN DETAIL

5.1 Detailed Description of the Site Area

A description of the site area is outlined below. The total red line application site boundary is c. 4.74 Ha (c. 47,335 sq m) and is broken down as follows:

- The developable site of c. 4.26 Ha (c. 42,547 sq m) at Milltown Park, Sandford Road
- Road works to Sandford Road and Milltown Road adjacent to the 2 No. entrances to the site (1 No. existing and 1 No. newly proposed): c. 0.16 Ha (c. 1,597 sq m); and
- Drainage works from Milltown Road to Eglinton Road: c. 0.32 Ha (c. 3,191 sq m).

A letter of consent has been received from Dublin City Council facilitating the proposed works to the Milltown Road, Sandford Road and Eglinton Road.

5.2 Description of the Proposed Development

The proposed development includes:

Reuse and Demolition of Existing Buildings

This section will detail the existing buildings to be reused/refurbished and demolished at the subject site. The outline of each building element is presented in Figure 5.1 below and detailed descriptions of each building are discussed in Chapter 7 of the EIAR (Architectural Heritage) which has been prepared by Molloy and Associates Conservation Architects and summarised in Section 3.2 of this Planning Report.

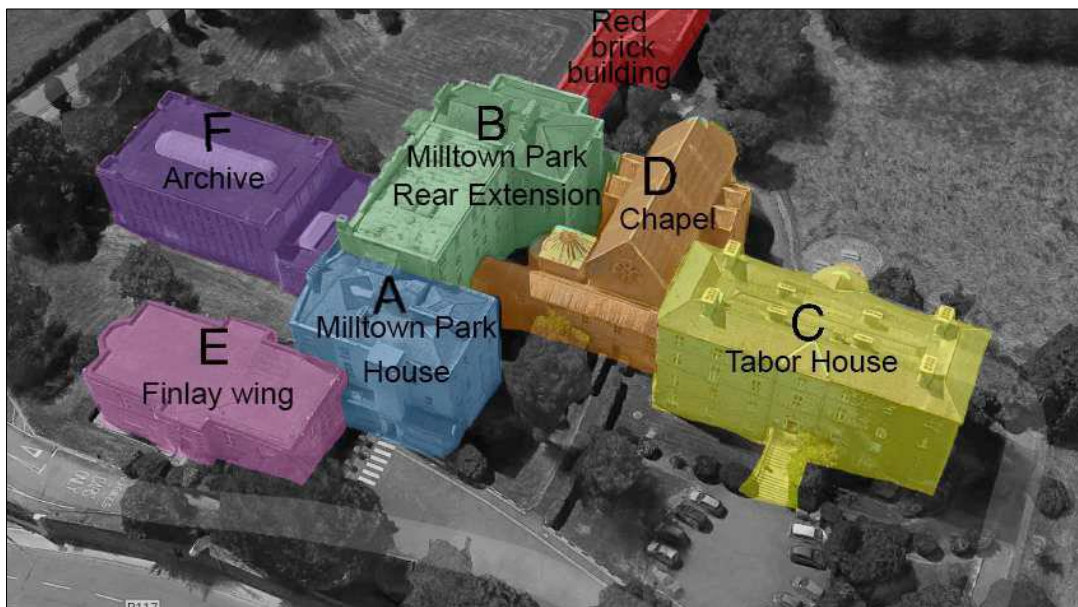


Figure 5.1: Identification of Existing Buildings

(Source: Molloy and Associates Conservation Architects, 2021)

Building C (Tabor House) and D (The Chapel) will be refurbished and repurposed within the proposed development with the remaining buildings to be demolished.

A new 2.4 metre high boundary wall across the site from east to west (towards the southern boundary) is proposed which requires the demolition of a portion of the red brick link building that lies within the subject site towards the south-western boundary (36.4 sq m) and the making good of the façade at the boundary. This will separate the remaining Jesuit lands from the subject development.

Early in the design process, studies were carried out in order to ascertain what buildings could be functionally retained and refurbished on the site. It was ultimately considered that Tabor House and The Chapel would be retained and reused in the proposed development and the remaining buildings would be demolished. The building elements to be demolished were considered for various uses however having regard to the existing limited floor to ceiling heights and poor infiltration of daylight to the building grouping for example, in addition to quantum of alterations that would be required which would essentially dramatically alter the appearance of some of the existing fabric, it was concluded that their adaption is was not viable or in the best interests of the overall Masterplan for the site. Please find the Feasibility Study attached as an Appendix to the OMP Design Statement and Chapter 4.0 of the EIAR which discusses alternative options for the proposed development.

Please see summary table below which sets out the buildings to be reused and buildings to be demolished:

Building A	Milltown Park House	880 sq m	Demolish
Building B	Milltown Park House Rear Extension	2,031 sq m	Demolish
Building C	Tabor House	1,575 sq m	Refurbish and Reuse
Building D	The Chapel	768 sq m	Refurbish and Reuse
Building E	The Finlay Wing	622 sq m	Demolish
Building F	The Archive	1,240 sq m	Demolish
Link Building between Tabor House and Milltown Park House Rear Extension Located to the Front of the Chapel		74.5 sq m	Demolish
Portion of 'red brick link building' (single storey over basement) within the subject site		36.4 sq m	Demolish



Figure 5.2:
Images of Tabor House (left) and the Chapel (right) to be reused within the development

(Source: Molloy and Associates Conservation Architects, 2021)

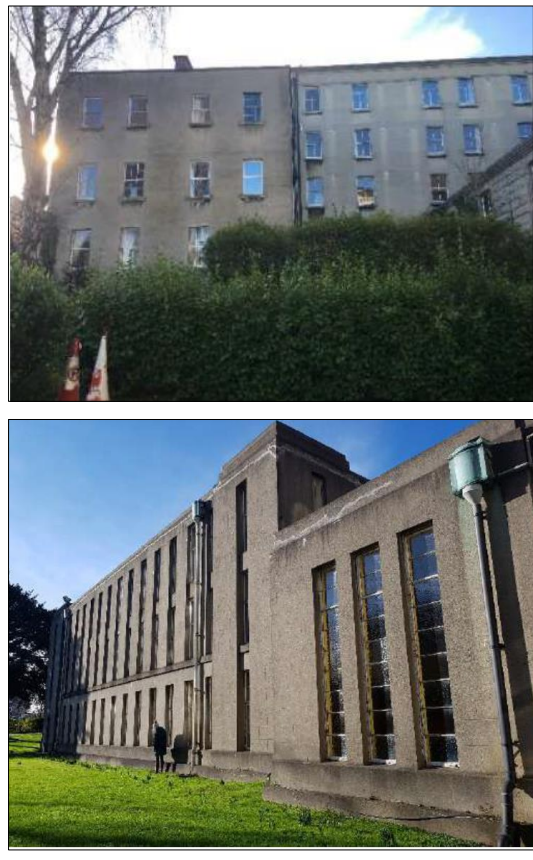


Figure 5.3: Images of Buildings to be Demolished as part of the Proposed Development

(Source: Molloy and Associates Conservation Architects, 2021)

Tabor House will be repurposed to provide 24 No. Build-to-Rent units and to refurbish the Chapel to provide communal amenity space. The reuse and refurbishment of Tabor House and the Chapel will allow a new setting to be created in the landscape and the buildings will act as a focal point for the development especially entering the principal entrance from Milltown Road or walking through the pedestrian street from the northern end with glimpses of Tabor House shown through the setback of Block B.

Chapter 7 of the EIAR prepared by Molloy & Associates Conservation Architects states the following:

'The proposal to restore and adapt selective buildings, which are deemed to be both of heritage significance and suitable for purposeful adaptation, has been conceived to minimise the extent of loss across the site as a whole. The works proposed to the buildings selected for reuse, have been designed with the objective of preserving the character of the site and detailed to minimise unnecessary loss...The potential for positive impact is inherent in the rejuvenation of the site through the adaptation of existing building fabric of heritage interest and the provision of new buildings to secure a sustainable long-term use for the site...The retention of two buildings for purposeful re-use within the vast building range presents an inherently positive impact for the legibility of the original function of the site.'

Please see Figures 5.4 and 5.5 below which demonstrates the views of Tabor House from the pedestrian street (with the ground floor of Block B designed as a colonnade to ensure glimpses of Tabor House are provided) and the new entrance from Milltown Road.



Figure 5.4: CGI Towards Tabor House from the Pedestrian Boulevard

(Source: 3D Design Bureau, 2021)



Figure 5.5: CGI Towards Tabor House from the New Milltown Road Entrance

(Source: 3D Design Bureau, 2021)

Development

The development will include the refurbishment and reuse of Tabor House (1,575 sq m) and the Chapel (768 sq m), and the provision of a single storey glass entrance lobby to the front and side of the Chapel; and the provision of a 671 No. unit residential development comprising 604 No. Build-to-Rent apartment units (88 No. studios, 262 No. one bed units, 242 No. two bed units and 12 No. three bed units) and 67 No. Build-to Sell apartments and duplex units (11 No. studios, 9 No. one bed units, 32 No. two bed units and 15 No. three bed units).



Figure 5.6: CGI of the Proposed Scheme

(Source: 3D Design Bureau, 2021)

5.3 Key Site Statistics

Key Site/Development Statistics	
Site Area:	<p>Total Red Line Application Boundary: c. 4.74 Ha (c. 47,335 sq m) broken down as follows:</p> <ul style="list-style-type: none"> • 'Developable' Site Area: c. 4.26 Ha (c. 42,547 sq m): • Road works to Milltown Road and Sandford Road adjacent to the 2 No. proposed entrances: c. 0.16 Ha (c. 1,597 sq m) • Drainage works to Eglinton Road: c. 0.32 Ha (c. 3,191 sq m)
Existing Gross Floor Area	c. 7,226.9 sq m
Extent of Reuse and Refurbishment	c. 2,343 sq m (Tabor House - 1,575 sq m and The Chapel – 768 sq m)
Demolition Area	<p>c. 4,883.9 sq m including:</p> <ul style="list-style-type: none"> • Milltown Park House (880 sq m); • Milltown Park House Rear Extension (2,031 sq m); • the Finlay Wing (622 sq m); • the Archive (1,240 sq m); • the link building between Tabor House and Milltown Park House rear extension to the front of the chapel (74.5 sq m); and • 36.4 sq m of the 'red brick link building' (single storey over basement) towards the south-western boundary.
Gross Floor Space (Above Ground)	54,871 sq m (including 400 sq m creche)
Basement Gross Floor Area	10,607 sq m
Site Coverage:	23.4%
Plot Ratio:	1.29
No. of Units Proposed	671 No. units (604 No. Build-to-Rent units and 67 No. Build-to-Sell units)
No. of Units per ha.	157.5 No.

Max. parapet height:	31.575 No. metres plus lift overruns
Car Parking Spaces:	295 No. at basement and 49 No. at surface level provided as follows: Surface <ul style="list-style-type: none"> • 35 No. resident spaces including 4 No. mobility impaired spaces; • 4 No. set-down/collection spaces; • 5 No. GoCar; • 2 No. taxi; and • 3 No. creche parking spaces. Basement <ul style="list-style-type: none"> • 295 No. resident parking spaces (including 14 No. mobility impaired spaces, 35 No. Electric Vehicle spaces, 5 No. Development Car Share Spaces)
Bicycle Parking Spaces	1,361 No.
Motorcycle Spaces	14 No.
Public Open Space	34.9% (14,848 sq m) of developable site area (42,547 sq m): <ul style="list-style-type: none"> • Public Park & Plaza connected through the undercroft of Block A1 (10,970 sq m – 25.8% of the c. 42,547 sq m developable site area) • Northern Woodland Glade (c. 3,328 sq m (c. 7.8% of the c. 42,547 sq m developable site area) • Boulevard between Blocks A and B • c. 550 sq m (c. 1.2% of the c. 42,547 sq m developable site area)
Communal Open Space	12.8% (5,444 sq m) of developable site area (42,547 sq m) as follows: <ul style="list-style-type: none"> • Belvedere Garden (North of Block C): 120 sq m • Tabor House and Formal Food Garden: 3,704 sq m • Courtyard between Block B and C: 1,510 sq m; and • Front of communal internal spaces in Block B and C: 110 sq m
Communal Amenity Terraces	Upper Level Terraces are provided in Blocks A1, B and C (4,31 sq m)

<p>Internal Communal Amenity Space</p>	<p>The total communal internal amenity space provided is c. 1,248.8 sq m) throughout the residential blocks, Tabor House and the converted Chapel building including:</p> <ul style="list-style-type: none"> • lounges; • co-working space; • gymnasium; • reading rooms; • games room; and • multi-purpose space.
---	--

5.4 Height and Massing

The proposed layout of the scheme has been subject to numerous design iterations and therefore we consider that the scheme as proposed is the optimal solution for the lands (further details in Chapter 4 of the EIAR – Examination of Alternatives).

The proposed layout has positioned the highest forms at the least sensitive locations throughout the site (fronting Milltown Road and Sandford Road, fronting the large public open space area to the east of the site, and towards the centre and southern portions of the subject lands), at a distance from sensitive residential receptors and behind the substantial tree belt along the northern and eastern boundaries.

The proposed heights are as follows:

- Block A1 will range in height from part 5 No. storeys to part 10 No. storeys and will comprise 94 No. Build-to-Rent units;
- Block A2 will range in height from part 6 No. storeys to part 8 No. storeys (including part double height at ground floor level) and will comprise 140 No Build to-Rent units;
- Block B will range in height from part 3 No. to part 7 No. storeys and will comprise 91 No. Build-to-Rent units;
- Block C will range in height from part 2 No. storeys to part 8 No. storeys (including part double height at ground floor level) and will comprise 163 No. Build-to-Rent units;
- Block D will range in height from 3 No. storeys to 5 No. storeys and will comprise 39 No. Build-to-Sell units;
- Block E will be 3 No. storeys in height and will comprise 28 No. Build-to-Sell units;
- Block F will range in height from 5 No. storeys to part 7 No. storeys and will comprise 92 No. Build-to-Rent units; and
- The refurbished Tabor House (4 No. storeys including lower ground floor level) will comprise 24 No. Build-to-Rent units.

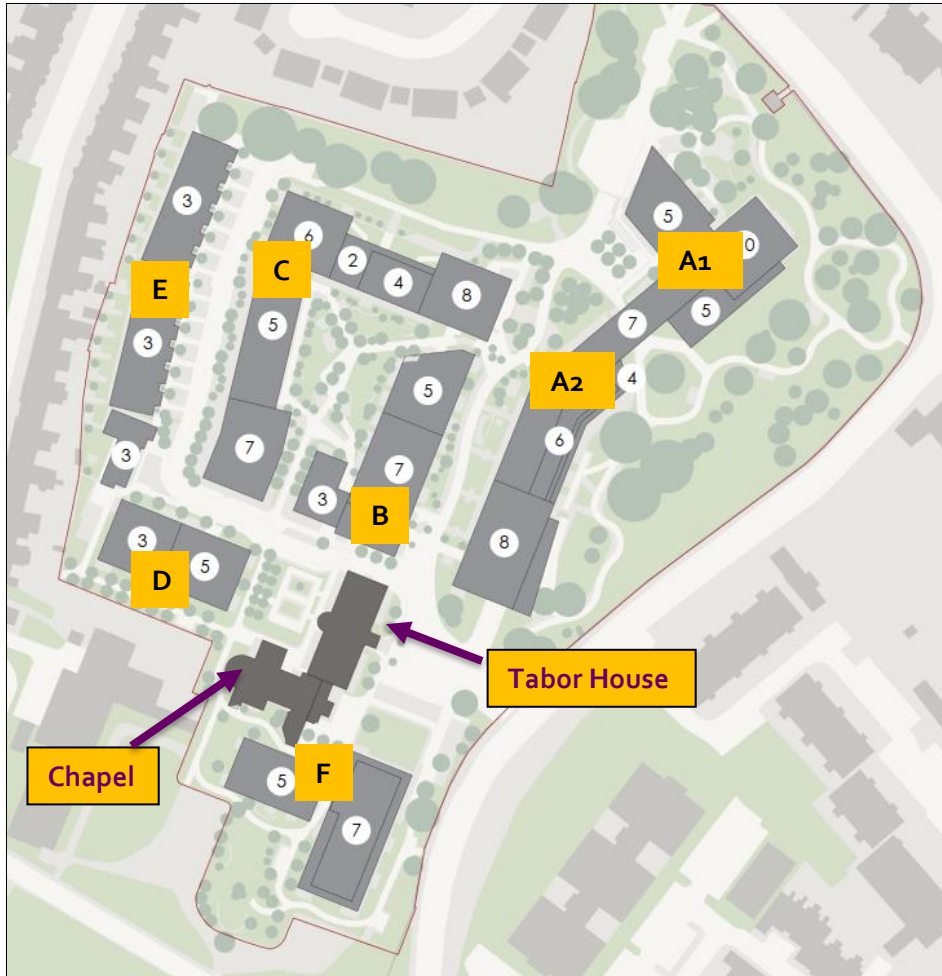


Figure 5.7: Proposed Layout of the Subject Development with the Heights Annotated

(Source: OMP Architects, 2021)

The proposed development strikes a balance between respecting the surrounding context of the site while also ensuring that this prominent strategic site is appropriately densified. Each block has a subtle shift in direction as a response to its particular urban condition.

The Masterplan & Architectural Design Statement prepared by O' Mahony Pike Architects notes the following in relation to building heights at the subject site:

Height Baseline - Design strategy is to establish baseline height of 5 storeys within the centre of the scheme which, depending on the contextual edge condition and degree of separation, steps up or down 2 storeys.

Anchor buildings - These elements of 7-8 storeys provide accent and variation at either end of the axial route between the forecourt and the plaza which enhances legibility, wayfinding and connectivity.

Urban Marker - The proposed 10 storey 'urban marker' acts as a reference point within the local area to enhance legibility and placemaking by announcing the development

sitting within an expansive site which is otherwise concealed from the wider community behind an existing 3M high perimeter wall and existing mature tree belt.

Placemaking - The location of this urban marker responds to the wider context and urban morphology by marking the key junction and transition between the merging neighbourhoods of Milltown, Ranelagh, Clonskeagh and Donnybrook. The design intent, massing and orientation of this building specifically responds to the view South from this junction on Eglinton road creating an elegant 'punctuation mark' as the building extrusion emerges at a suitable height above the horizontal 'green veil' around the perimeter of the site along the North and East edges. As such, at the neighbourhood scale it acts as a 'reference point' in the landscape.

Emerging Context - A taller building in this location it will add interest to the skyline and provide a visual reference point. While the site is on the periphery of the City Centre, it is in an area of emerging urban character with substantial developments to the South and East.

Green Belt - This urban marker addresses the flow of the park as it winds its way around the North/ East corner while also signifying the wide 3 storey pedestrian archway connection between the park and the central plaza space. With the exception of the urban marker the rest of the development will be below the height of the existing mature tree belts which are retained and provide a 'green veil' to the perimeter of the site along the North and East edges.

It is our opinion that the careful modulation of height throughout the site responds to the situational context of each individual block provided in the subject development. The proposed heights are appropriate having regard to the expressed requirement in National level policy to achieve compact growth and have also respected the surrounding context by providing large separation distances as demonstrated below:

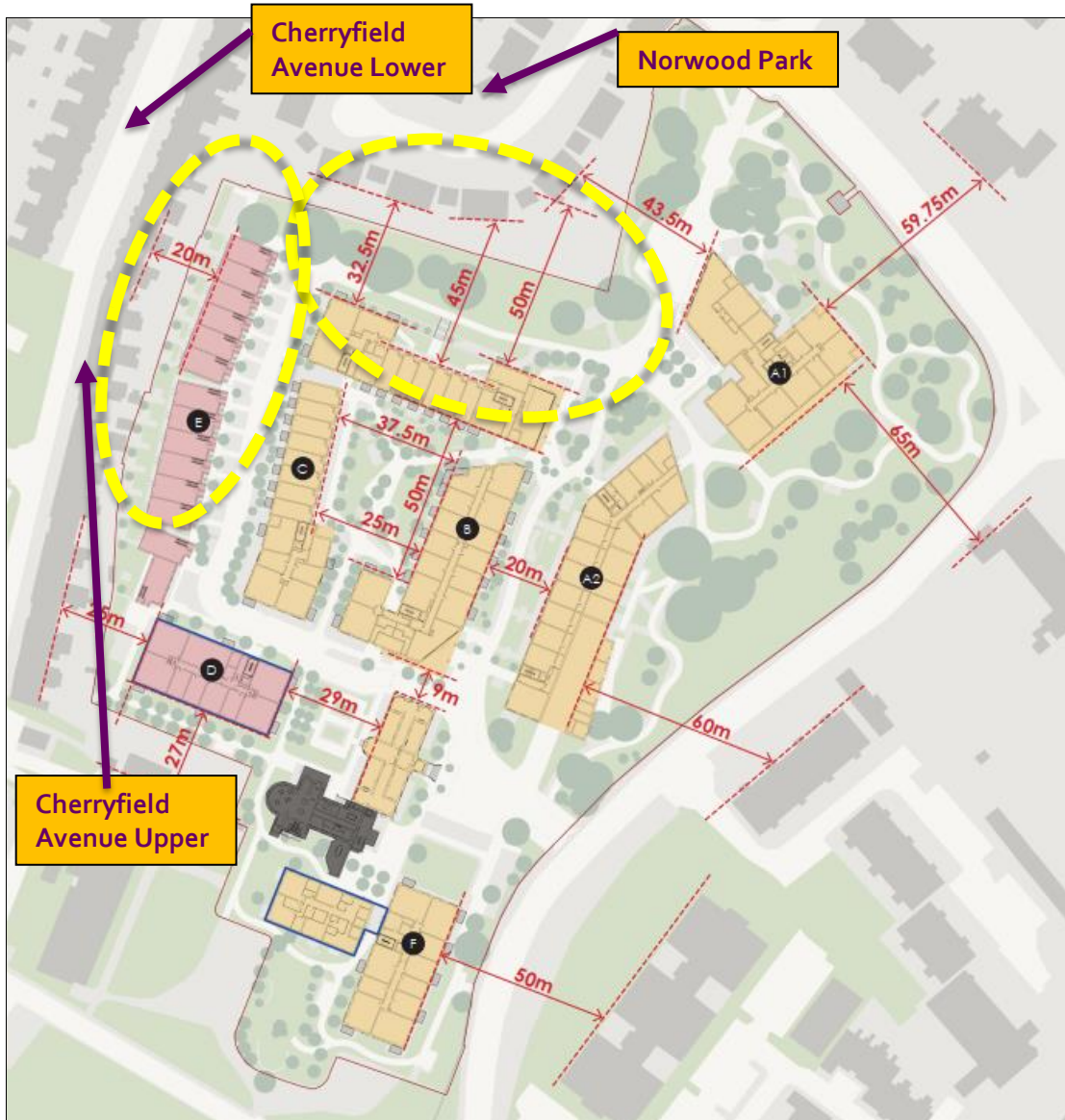


Figure 5.8: Separation Distances Proposed with Large Setbacks from Block C and 3 No. Storey Duplexes and Apartments in Block E Highlighted

(Source: OMP Architects, 2021)

We note that a key priority throughout the detailed design stage of the development was to provide sufficient setbacks and appropriate transitions from the residential properties along Cherryfield and Lower along the western boundary and from the residential properties along Norwood Park to the north. In this regard, 3 No. storey duplexes and apartments have been provided along the western boundary of the site adjacent to the Cherryfield Avenue Upper and Lower residences with importantly no balconies proposed along the rear elevation. A high-level window is provided to the living/kitchen/dining room at first floor level of the duplexes with a pop-out bay window incorporating a solid back wall and glazing to the sides provided for the upper-level bedroom at the rear.

In addition, large setbacks of between c. 32.5 metres and c. 50 metres have been provided between the Norwood Park dwellings and Block C which comprises building heights of 2, 6 and 8 No. storeys. Furthermore, an 'inset' has been provided towards the centre of Block C

along the northern boundary, which will provide a 45 No. metre setback from the rear of the Norwood Park dwellings. Norwood Park is also protected by a tree belt along the northern boundary.

The image below demonstrates the additional inset provided along the north of Block C:

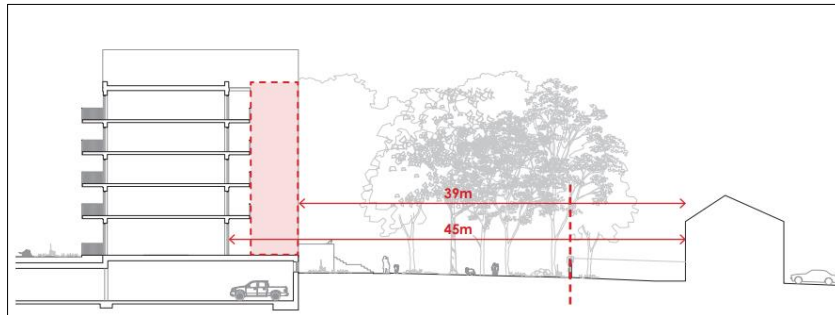


Figure 5.9: Additional Inset Provided to the North of Block C

(Source: OMP Architects, 2021)

Furthermore, Block D proposes heights of 3 to 5 No. storeys with the 3 No. storey element positioned adjacent to the neighbouring dwellings on Cherryfield Avenue Upper to provide an appropriate transition.

Block F to the south of the site ranges in height from 5 No. to 7 No. storeys and has been set back from the retained Jesuit lands. This boundary between Block F and remaining Jesuits lands will be provided with the new 2.4-metre-high boundary wall proposed as part of this planning application to separate the Applicant's lands from the remaining Jesuit lands.

The scheme then transitions in height along the eastern boundary with Block A1 ranging in height from part 5 No. to part 10 No. storeys and Block A2 ranging in height from part 6 to part 8 No. storeys (including part double height at ground floor level). The 10 No. storey A1 block will act as a 'visual marker' for the development at the prominent junction of Sandford Road and Milltown Road at a key arterial crossroads between Milltown, Clonskeagh, Donnybrook and Ranelagh. Block A1 (10 No. storey element) will improve legibility and wayfinding for the wider area and internally within the site. In addition, we note that the massing of Block A2 is reduced by the setbacks (4 and 6 No. storeys) provided along the eastern elevation fronting onto the public park.

The Landscape and Visual Impact Assessment prepared by Modelworks (EIAR Chapter 9) notes the following in relation to Block A1:

'The intention of this height is to take advantage of its separation distance from neighbouring buildings (arising from the set back behind the woodland belt), (b) take advantage of the screening provided by the trees (for views from close-up in particular), and (c) to protrude above the tree line in more distant views - in order to have sufficient visual presence to achieve a place-making effect and improve legibility (which is lacking at this important junction in the urban structure).'

The presence of the tree belt will reduce the visual impact of the building while also ensuring that it achieves place-making and improves legibility for the area.

The following is also set out in the Landscape Visual Impact Assessment in relation to the proposed built form at this prominent junction:

'The junction funnels traffic from three urban cores, i.e. Clonskeagh/UCD, Milltown and Donnybrook towards the city centre via Ranelagh. The site occupies the most prominent of the four quadrants around the junction. Due to a number of factors, including the non-orthogonal configuration of the junction, the absence of buildings at the corner of the site, and the wall and trees along the site boundary, the junction does not manifest as a distinct 'place' in the townscape. Despite the large houses and trees around the junction it does not figure clearly in people's mental map of the area and does not contribute positively to legibility.

The junction as a place, and the streets to which the site has frontage, warrant greater emphasis in the townscape – to give better definition to the junction locally, and to improve the legibility of the urban structure. This can be achieved only by built form on the site (the other quadrants around the junction all being already developed).'

Please see the summary table below for details of the heights proposed within the subject development:

Block	Storeys Proposed
Block A1	Part 5 No. storeys to part 10 No. storeys
Block A2	Part 6 No. storeys to part 8 No. storeys (including part double height at ground floor level)
Block B	Part 3 No. storeys to part 7 No. storeys
Block C	Part 2 No. storeys to part 8 storeys
Block D	Part 3 No. storeys to part 5 No. storeys
Block E	3 No. storeys
Block F	Part 5 No. storeys to part 7 No. storeys
Conversion of Tabor House	4 No. storeys

In addition, internal separation distances are proposed as follows between the blocks:

- 25 – 50 metres between Blocks B and C in the internal courtyard;
- 20 metres between Blocks A and B;
- 29 metres between Tabor House and Block D; and
- 9 metres between the gable of Tabor House and Block B.

It is our professional planning opinion that the proposed heights of part 2 to part 10 No. storeys across the site cannot be considered challenging on this core urban site. It is clear that the Design Team has comprehensively considered the height of the blocks within the proposed development as the modulation of height throughout the site responds to the situational context of each block within the site. The 10 No. storey pop-up 'visual marker' is a key element of the proposed scheme in terms of its role in wayfinding for the local area and internally in the site and will act as a focal point for the scheme having regard to its position at a prominent junction at the edge of 4 No. key suburbs.

Please see the OMP Architects Design Statement for further details on the Height and Layout Strategy for the proposed development. The OMP Design Statement states the following in

relation to the massing strategy and also details various massing studies which have resulted in the current layout proposal, including focus on providing public park and enhancing permeability:

'From the outset we investigated the relationship between the existing woodland park to the East and our proposal, looking to enhance connectivity between the park and the internal public square while improving permeability through the site. We also opened the site to provide a public short-cut along the natural desire line from the new Milltown entrance to Ranelagh Village via this parkland edge and exiting through the existing entrance at Sandford Road.'

The expansive 3 storey archway through the linear building which connects the internal public square to the parkland denotes the significance of the mature blue cyprus tree at the intersection with the tree belt. Block A was designed in direct response to this signature tree whereby the cranked geometry of the building and location of the archway combined to celebrate this interface and provide for a strong connection between the architecture and landscape design.

We explored the building in section, studying the views into the tree belt from the apartments at various heights, we also created setbacks in the building form at high level to create wider private terraces, availing of the mature tree belt and this rich amenity space.' [Our Emphasis]

Figure 5.10 below demonstrates the massing strategy for Block A for example:

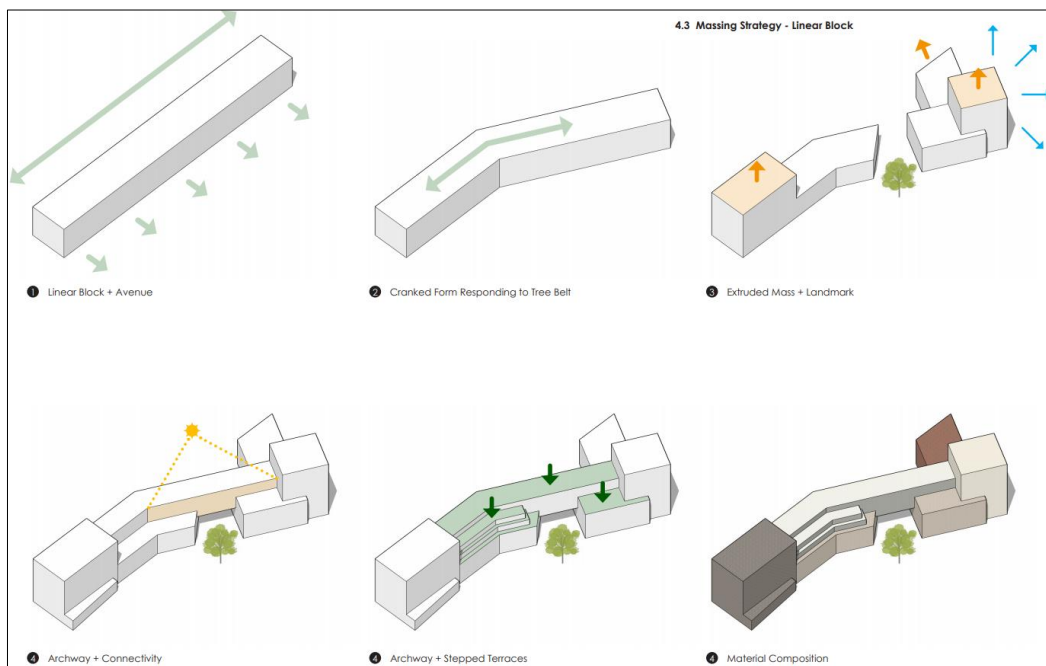


Figure 5.10: Block A Massing Strategy

(Source: O' Mahony Pike Architects, 2021)

In addition, the massing strategy for the area surrounding the existing buildings, which are proposed to be reused and refurbished (Tabor House and Chapel), is provided below:

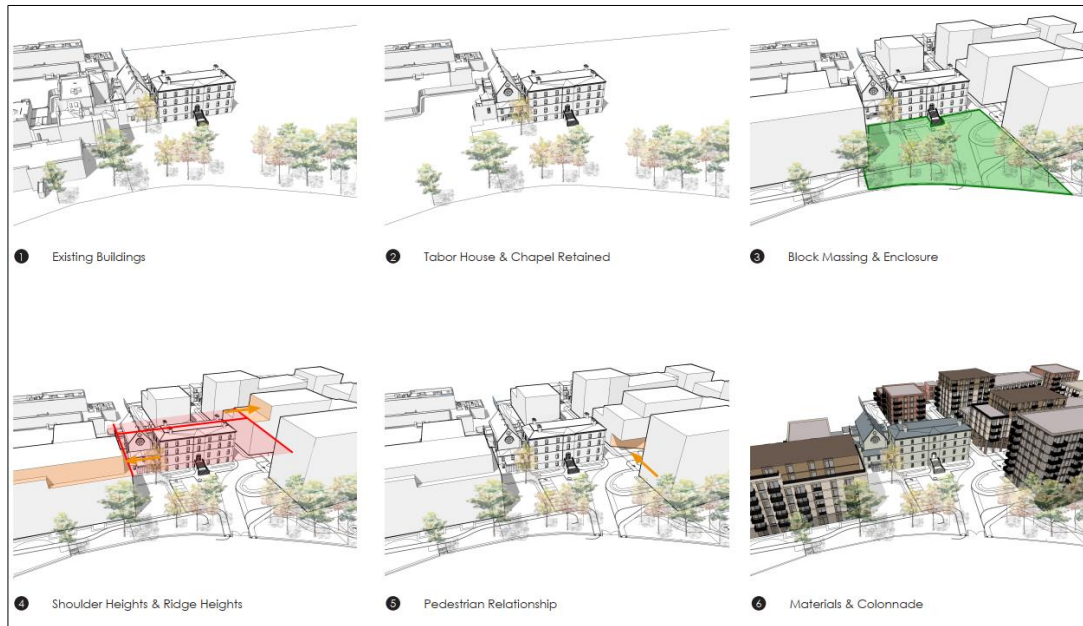


Figure 5.11: Existing Buildings Massing Strategy

(Source: O’ Mahony Pike Architects, 2021)

To conclude this section, it is clear that the Design Team has comprehensively considered the massing and modulation of the blocks within the proposed development. It is our professional planning opinion that the proposed heights of part 2 to part 10 No. storeys across the site cannot be considered challenging on this large site. The modulation of height throughout the site responds to the situational context of the site. The 10 No. storey pop-up ‘visual marker’ is a key element of the proposed scheme in terms of its role in wayfinding for the local area and internally in the site and will act as a focal point for the scheme having regard to its position at a prominent junction.

The recent publication of the *National Planning Framework* (“NPF”) and the *Urban Development and Building Height Guidelines for Planning Authorities, December 2018*, (“*Building Height Guidelines*”) both encourage the provision of increased height and increased density in appropriate locations in order to create a more consolidated urban form and counteract urban sprawl as detailed extensively in the accompanying Statement of Consistency prepared by Thornton O’Connor Town Planning.

5.4.1 Daylight/Sunlight Analysis

According to the daylight/sunlight analysis, the proposed development would not result in a significant reduction to the level of daylight and sunlight received by the surrounding existing properties. Future occupants will enjoy good levels of daylight within the vast majority of the proposed units (c. 91% meeting the ADF targets when the 2% ADF target is utilised for living/kitchen/dining rooms and over 96% meeting the ADF targets when the 1.5% ADF target is utilised for living/kitchen/dining rooms) and the units will have access to internal and external amenity areas and that are capable of receiving excellent levels of sunlight.

The inclusion of large open plan floorplates and large external open spaces will ensure high quality residential amenity is provided for the future tenants and the block orientation and

massing also provide opportunities for light infiltration to the open spaces ensuring that these spaces will be attractive and useable.

The *Apartment Guidelines, 2020* state:

'Planning authorities should have regard to quantitative performance approaches to daylight provision outlined in guides like the BRE guide 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting' when undertaken by development proposers which offer the capability to satisfy minimum standards of daylight provision'.

As set out in the Daylight and Sunlight Assessment Report prepared by 3D Design Bureau,

'The BRE Guide is preceded by the following very clear warning as to how the design advice contained therein should be used:

"The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design."

That the recommendations of the BRE Guide are not suitable for rigid application to all developments in all contexts, is of particular importance in the context of national and local policies for the consolidation and densification of urban areas or when assessing applications for highly constrained sites (e.g. lands in close proximity or immediately to the south of residential lands).'

The *Apartment Guidelines, 2020* further state:

'Where an applicant cannot fully meet all of the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, which planning authorities should apply their discretion in accepting taking account of its assessment of specific. This may arise due to a design constraints associated with the site or location and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution'.

Therefore, the *Apartment Guidelines, 2020* notes that any shortfalls in daylight provisions must be identified. The daylight/sunlight report demonstrates the units that do not fully meet the daylight requirements.

As part of a compensatory design solution for the rooms that do not meet the recommended minimum average daylight factor, the proposed development includes communal amenity areas, all of which have been assessed and will have adequate levels of daylight. Furthermore, the scheme has incorporated a number of localised compensatory design measures. The rooms that do not meet the ADF target have also been provided with either some or all of the following compensatory measures:

- Balcony space, some of which exceed the minimum requirement.
- Windows that face public open space in the development.
- Larger apartment floor areas, some of which are 10% larger (or more) of the minimum required standards.

A list of the rooms that fall short of the daylight provisions and demonstrated the compensatory design measures provided in Appendix A to this Statement of Consistency / Material Contravention Statement Reports enclosed.

Therefore, having regard to the results of the Daylight/Sunlight assessment, the building heights and separation distances proposed are appropriate at the subject lands. Furthermore, the recently adopted *Building Height Guidelines* set out that a key objective of the *NPF* is to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at Local Authority and An Bord Pleanála levels.

5.5 Density

The subject application proposes 671 No. units (604 No. Build-to-Rent and 67 No. Build-to-Sell units). The proposed gross residential density is calculated below:

$$\frac{671 \text{ No. Units}}{4.26 \text{ Ha}} = 157.5 \text{ Units Per Hectare}$$

The proposed density of 157.5 No. units per hectare on this core urban site is not challenging on the subject site especially as the site can accommodate the proposed density because of the extensive quantum of public and communal open space provided. We note an example of some recent grants of permission issued by An Bord Pleanála as follows:

- Eglinton Road (385 No. units per hectare) – ABP Ref. PL29S.303708;
- Marmalade Lane, Dundrum (density of 180 No. units per hectare reduced to 128 No. units per hectare due to design amendments required by condition, however the Inspector considered the density of 180 No. units to be acceptable) – ABP Ref. PLo6D.308157;
- Green Acres, Convent, Dundrum (174 No. units per hectare) – ABP Ref. PLo6D.307683;
- Shanganagh Road, Shankill (138 No. units per hectare) – ABP Ref. PLo6D.308418;
- Scholarstown Road (110 No. units per hectare) – ABP Ref. PLo6S.305878; and
- Roselawn and Aberdour (167 No. units per hectare) – ABP Ref. PLo6D.304068.

It is clear that National policy supports higher density development on core urban and well serviced sites in order to ensure that prime underutilised lands are appropriately densified.

5.6 Design Rationale

The Architectural Design Statement prepared by OMP Architects and the Landscape Design Statement by Cameo and Partners Design Studio are enclosed as separate documents, which set out the high-quality design of the scheme which has comprehensively considered the surrounding context while appropriately densifying this underutilised accessible site.

5.6.1 Materials

As set out in the Architect's Design Statement prepared by OMP Architects, the primary material context of the development is brick (buff/brown, red/brown and grey). The following description of materials is provided:

'Both the historical and contemporary context heavily rely on brick as the predominant building material, with a wide variety of colours and types reflecting the piecemeal development of the area over a prolonged period of time. Although alternative materials have been explored, brick feels a natural choice for the base material for our proposal. It is our intention that through considered sampling and selection, brickwork for the body of the buildings will bring a domestic, softened and textural quality to the building, whilst also echoing character traits of its context in the area. However the three main contextual conditions surrounding Sandford Road are broadly coherent in three broad hues:

Buff/Brown Brick, reflecting the predominant brick type along Ranelagh Road, as well as working with the painted render St James Terrace. This colour choice also responds to the sites Tabor House & Chapel buildings.

Red/Brown, reflecting the predominant use of red along Eglinton Road, Sandford Road & Belmont Avenue.

Grey Brick, referencing the harder facing base and edge stone which is apparent on the historical housing façade typologies to create a hard wearing street interface plinth.

The completed building expression provides a simple building form that reinterprets the surrounding building fabric to relate positively to neighbouring structures and create a harmonious whole. The architecture of each building varies enough to ensure a diverse and interesting urban fabric, albeit within a considered palette of complimentary materials and colours. Subtle variations in the architectural expression and material palette of the different blocks to ensure a diverse and interesting urban fabric, albeit within a considered palette of complementary materials and colours that provide a degree of variation and interest as the building forms progress and relate to the different surrounding conditions.'

It is clear from the detailed Architectural Design Statement submitted with this planning application that high-quality materials have been proposed for the subject scheme.

5.6.2 Communal Internal Amenity Space

The development will provide high-quality internal communal amenity space and facilities throughout the residential blocks, Tabor House and the converted Chapel.

The development will consist of the provision of communal internal amenities as follows:

	Amenities	Sq m
Block A1 - GF	Lounge, Reading room	198.8
Block A1 - 04	Residents club	111.4
Block B - GF	Lounge, Reading room	52.1
Block B - 05	Residents Lounge	117.4
Block C - GF	Co- working space	115.1
Block TH - GF	Lounge	15.2
Block TH - 01	-	-
The Chapel GF (Residents Hub)	Gym, Games rooms, Kitchen, Garden room	288.9
The Chapel 01 (Residents Hub)	Lounge, co working, Meeting room, Multipurpose space	349.9
TOTAL		1248.8

The development will consist of the provision of communal facilities to serve the residents:

	Facilities	Sq m
Block A1 - GF	Concierge, Mail, WC	70.7
Block A1 - 04	-	-
Block B - GF	Concierge & Mail	45.6
Block B - 05	-	-
Block C - GF	-	-
Tabor House - GF	-	-
Tabor House- 01	Lobby & Mail	18.8
The Chapel GF (Residents Hub)	Staff facilities	23.2
The Chapel 01 (Residents Hub)	-	-
Total		158.3

The development also includes upper level communal terraces in Blocks A1, B and C which will face all directions (431 sq m).

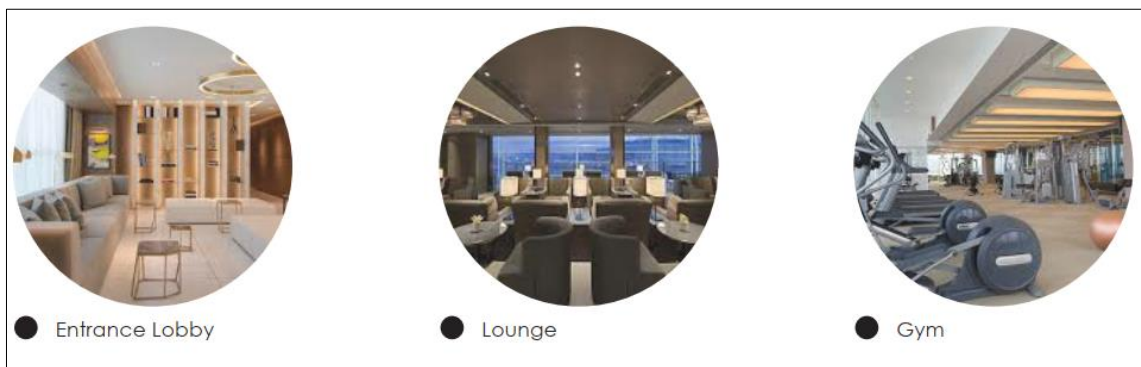


Figure 5.12: Images Demonstrating an Example of the Internal Amenity Spaces to be Provided

(Source: OMP Architects Design Statement, 2021)



Figure 5.13: Internal CGI of the Proposed Refurbished Chapel

(Source: 3D Design Bureau, 2021)

An overview of the provision of amenities and facilities is provided below:

Chapel – Residents Hub

The retention of the Chapel and Tabor house buildings were central to the masterplan from an early stage, creating a focal point for this new neighbourhood. The Chapel will house the main amenity hub for the new development with an impressive multi purpose hall on the first floor which will be used for a number of activities from movie screenings to gatherings or simply somewhere to lounge and relax. While the lower level will provide further games rooms, meeting rooms, and flexible break out spaces, which might be hired by residents for parties as required. There will also be some kitchen facilities here to support any events or gatherings above in the 'great hall'. This lower level will also connect to the formal garden to the rear of Tabor house which will be planted as an edible garden with natural produce ranging from fruit bearing shrubs, herb gardens and a variety of fruit trees, such as apple, pear and plum.

Block A Amenities and Facilities

A team of dedicated staff will be on hand 24 No. hours a day to make sure all the residents needs are met. The reading room and lounge offer a space to relax with a newspaper or curl up with a good book while enjoying the views to the plaza or the parkland beyond. The location of amenity space at the Sandford entrance opening onto the plaza will become the core for residents, bolstered by the smaller concierge to the south of the Boulevard in Block B.

An upper level terraces is provided where you can enjoy a tea or coffee throughout the day and simply unwind and relax. The space will be characterised by the views out over the woodland park, with a terrace directly accessible from this lounge. Another terrace to the



west for evening sun will provide with views over the plaza and beyond to Tabor House at the end of the Green Boulevard.

Block B and C Amenity and Facilities

Residents Lounge & Terrace

The flexible lounge space in Block B is provided views over the forecourt and the historic buildings will offer residents an alternative space to unwind, entertain guests or host magical family gatherings. The landscaped terrace will provide a visual connection to the formal food garden to the south and views to the Dublin mountains beyond.

Co-working space

Opening onto the Plaza from Block C, an open and bright co-working space is provided to offer the residents an alternative to their work from home routine. Centrally located, this co-working space will help to animate the plaza and build on the sense of community across this development.

24-Hour Concierge, Lounge & Reading Room

As a counterpart to the concierge in Block A1, the corner of Block B welcomes residents from the Milltown entrance with a striking reception and lounge. Again, the concierge here will serve the residents needs from parcel delivery to repairs.

Summary

It is clear that a wide range of high-quality amenities and facilities are proposed of the subject scheme. We have been advised that the Applicant are operating developers whose intention is to hold the assets long term and as such have designed them to international operating standards. Representatives of the Applicant has travelled extensively looking at projects in other countries. A key element of successful Build-to-Rent offerings in particular is to provide useable and well managed tenant amenities that ultimately contribute to providing high-quality residential accommodation and a successful and integrated community setting.

5.6.3 Creche

The proposed development will provide a creche (400 sq m) within the ground floor of Block F and will cater for c. 80 No. children. This crèche will contain 5 No. classrooms and includes a dedicated open space area (280 sq m) for staff and children to utilise.

Although the Childcare Demand Assessment prepared by KPMG Future Analytics enclosed separately concludes that there is sufficient capacity in the area to cater for the proposed development, the Applicant has decided to incorporate a crèche into the scheme, which as well as benefiting the future residents of the development, it will also cater for the immediate existing residents of the area, and thus will greatly enhance the amenity of the area.

5.6.4 Landscape Strategy

We reiterate that the application lands have always been in private use and have thus been closed off from the general public. Therefore, the landscape strategy for the site will



completely open up the site as a public amenity for the first time. A Landscape Design Statement has been prepared by Cameo and Partners Design Studio and is enclosed with this planning application. This Report sets out in detail the open spaces provided throughout the site and notes that:

'The design philosophy for the proposed new residential scheme in Sandford aims to create a high-quality residential community with a splendid and unique, contemporary landscape design within a parkland setting which is cognisant of the historical context of the site and its notary buildings'.

The Report notes that an overarching aim of the proposed development is to create a new residential development integrated within the existing landscape setting of the site through a series of connected landscape character areas.



Figure 5.14: Ground Floor Illustrative Landscape Masterplan

(Source: Cameo and Partners Design Studio, 2021)



Figure 5.15: Overview of the Proposed Development Demonstrating the Green Emphasis of the Scheme

(Source: Cameo and Partners Design Studio, 2021)

The Landscape Report outlines the various character areas proposed within the development with a particular focus on the 25% public open space requirement of the Z15 zoning pertaining to the lands.

Public Open Space

The Landscape Plan and Report outlines the various character areas proposed within the development with a particular focus on the 25% public open space requirement of the Z15 zoning pertaining to the lands.

The public open space is provided as follows:

- **Public Park and Plaza Area Connected Through the Triple Height Undercroft of Block A1:**
 c. 10,970 sq m (c. 25.8% of the c. 42,547 sq m developable site area)
- **Northern Woodland Glade:**
 c. 3,328 sq m (c. 7.8% of the c. 42,547 sq m developable site area)
- **Boulevard between Blocks A and B providing a pedestrian and cycle connection between Milltown Road and Sandford Road:**
 c. 550 sq m (c. 1.2% of the c. 42,547 sq m developable site area)



Figure 5.16: Public Open Space Provision at the Application Site

(Source: Cameo and Partners Design Studio, 2021)



Figure 5.17: Public Open Space Provision at the Application Site

(Source: Cameo and Partner Design Studio s, 2021)

Therefore, a total of 14,848 sq m (c. 34.9% of the developable site area) has been designated as public open space which significantly exceeds the requirement to provide 25% public open space.

The majority of this space (25.8%) will be provided in the eastern parkland and the plaza area which are linked through the triple height undercroft of Block A1.

We note that the large public park along the eastern boundary of the site is currently significantly overgrown and this space will be transformed by the subject development and will become a significant public amenity for the area. The opening up of the area while maintaining the woodland feel will allow access to the general public for the first time and the imposing boundary wall will be modified in sections to provide views into the site which will invite the public into the open spaces provided and will improve permeability in the area.

The proposed development will remove all Category U¹³ trees for ecological purposes. To improve the quality and usability of the open space areas to the north and east of the site, the poor quality Category C trees (91 No.) are recommended for removal and thus the proposed development will seek to open up this park for residents and visitors to enjoy.

Currently the eastern area is dominated by self-seeded specimens (categories C & U) many of which are drawn up for light and poorly formed as a result. The very high density of trees, which is the result of limited management interventions, restricts light from penetrating the canopy thereby reducing the diversity potential of the ground flora and also the areas overall habitat and recreational potential.

The management objective here is to remove low value trees (categories C & U) whilst retaining better-quality specimens (categories A & B) with the aim to improve the overall ecological and recreational potential of the area. Therefore, the provision of a high quality useable public park available to the wider community at the site will be a significant planning gain for the area (as the lands have always been in private use by the Jesuit community).

The public park links through the triple height undercroft of Block A1 to the plaza area where there will be no vehicular access allowed to the plaza area, thus ensuring that the space is high-quality for public use. The entrance from Sandford Road will be a secondary vehicular entrance, principally for taxis, set down and deliveries and bollards will prevent access to the plaza area, which will provide a safe and enjoyable environment for the public and residents. The opening up of the area while maintaining the woodland feel will allow access to the general public for the first time and the imposing boundary wall will be modified in sections to provide views into the site which will invite the public into the open spaces provided and will improve permeability in the area.

In addition to public park and plaza area connected through the undercroft of Block A1, a parkland walk (known as the Northern Woodland Glade) will also be provided to the north of Block C which is positioned adjacent to the plaza and the communal amenity space in Block C. This northern space represents c. 7.8% of the site area (or c. 3,328 sq m) and will provide further amenity on site in excess of the 25% requirement. The Woodland Glade will work

¹³ Trees in such condition that any existing value would be lost within 10 years and which should, in the current context, be removed for reasons of sound arboricultural management. Trees that are dead, dying or showing immediate and irreversible decline. (CMK, 2021)

together with the park and plaza as an entire connected public open space. In addition to utilising the eastern public park to travel through the site, the public can also utilise the pedestrian connection from Milltown Road and Sandford Road through the pedestrian boulevard (550 sq m or 1.3% of site area) between Blocks A and B.



Figure 5.18: Illustrations of the Proposed Transformed Public Park

(Source: Cameo and Partners Design Studio, 2021)



Figure 5.19: Illustrations of the Proposed Transformed Public Park

(Source: Cameo and Partners Design Studio, 2021)



Figure 5.20: Illustrations of the Triple Height Archway Linking the Public Park and the Plaza Area (see Top Left Image Showing Bollards to Prevent Access to Plaza)

(Source: Cameo and Partners Design Studio, 2021)



Figure 5.21: Illustrations of the Plaza Area

(Source: Cameo and Partners Design Studio, 2021)

Natural play facilities will be mainly focused within these areas, specifically aimed at children to reconnect with nature and there will also be opportunity for adult engagement through natural gym equipment. There will also be seating provided throughout the site.



Figure 5.22: Examples of Public Open Space Features

(Source: Cameo and Partners Design Studio, 2021)



Figure 5.23: Illustrations of the Woodland Glade to the North of Block C

(Source: Cameo and Partners Design Studio, 2021)



Figure 5.24: Illustration of the Pedestrian Street Linking Milltown Road Entrance to the Public Plaza and Beyond to Sandford Road

(Source: Cameo and Partners Design Studio, 2021)

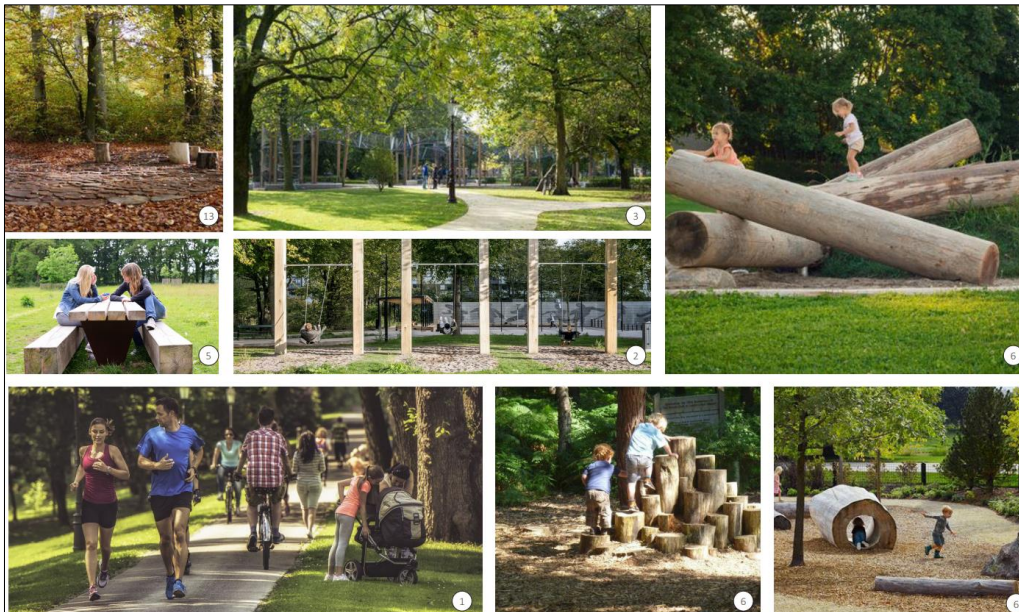


Figure 5.25: Examples of Public Open Space Features

(Source: Cameo and Partners Design Studio, 2021)

The proposed layout has comprehensively considered the public open spaces within the scheme. These spaces will be high-quality and will provide a place to meet, sit, exercise or to walk or cycle through, which is currently not an amenity available at the lands as the site has always been in private use.

Please see Section 7.3 of this Report for further details on the public open space provision in relation to the Z15 zoning requirement.

Communal Open Spaces

The total communal open space proposed at ground level is 5,444 sq m (12.8% of developable site area) and is provided as follows:

1. Belvedere Garden (North of Block C): 120 sq m
2. Tabor House and Formal Food Garden: 3,704 sq m
3. Courtyard between Block B and C: 1,510 sq m; and
4. Front of communal internal spaces in Block B and C: 110 sq m

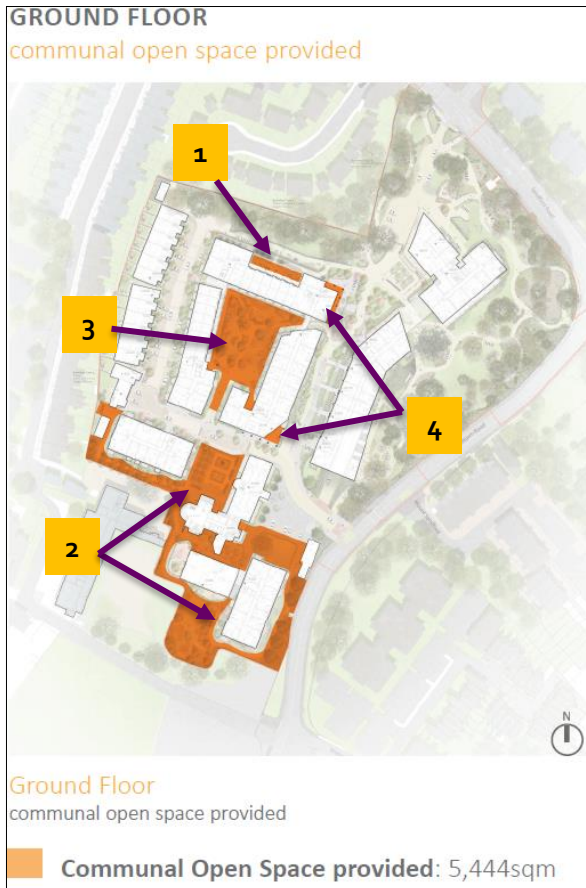


Figure 5.26: Communal Open Space Provision at the Application Site at Surface Level

(Source: Cameo and Partners Design Studio, 2021)

An example of the landscaped communal areas are provided below:



Figure 5.27: Illustrations of the Belvedere Garden to the North of Block C

(Source: Cameo and Partners Design Studio, 2021)



Figure 5.28: CGI of the Courtyard Between Blocks B and C

(Source: 3D Design Bureau, 2021)



Figure 5.29: Illustrations of Communal Open Space - Tabor House and Food Garden

(Source: Cameo and Partners Design Studio, 2021)

It is clear that the open space proposed has been central to the design of the development and will contribute to the assimilation of the development within its surrounding context, particularly having regard to the total provision of public and communal open space proposed which represents 47.7% of the site area.

In addition, there will be 431 sq m of upper level communal terraces in Block A1, Block B and Block C which will further add to the communal space provision within the proposed development.

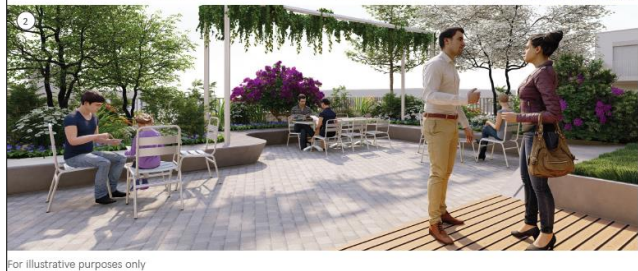


Figure 5.30: Illustrative Images of the Communal Amenity Terraces Proposed

(Source: Cameo and Partners Design Studio, 2021)

Proposed Boundary Treatment and Access Arrangements

The subject development proposes a new vehicular and pedestrian access point from Milltown Road which will be the principal entrance to the subject development and which will facilitate access to the basement car park, the forecourt adjacent to Tabor House and the duplex units and apartments along the western boundary (Block E).

This new access will also facilitate pedestrians and cyclists. DBFL have noted in the Traffic and Transport Assessment enclosed separately that the majority of vehicular traffic from Milltown Road (92%-96%) will filter directly into the basement car parking via a ramp proximate to the site entrance (within c. 20 metres of the site entrance) and this will ensure that the shared surface to the west of the site adjacent to the Block E duplexes and apartments will not be car dominated and will be a safe environment for all users.

The existing vehicular access off Sandford Road will be a secondary vehicular access to the site (principally for deliveries, emergencies and taxis for example with a small element of mobility impaired parking for residents and thus will have very minimal traffic movements). Some 2 No. new pedestrian gates will be provided at each access. In addition, a new pedestrian access will be provided at the junction of Milltown Road and Sandford Road which

demonstrates that ample permeable opportunities are provided in the proposed development.

In addition, we note that a portion of the boundary treatment of the existing wall will be modified along Milltown Road and Sandford Road. In this regard, a proposed upstand wall with railing will be provided in lieu of the existing cement or stone wall (predominately render removed) which will allow views into the site and will thus visually open the site up to the public and will enhance legibility in the area.

As part of the design process, Cameo and Partners have also developed a strategy for the boundary treatment as follows:



Figure 5.31: Boundary Treatment Strategy

(Source: Cameo and Partners Design Studio, 2021)



Figure 5.32: Illustrations of the Proposed Boundary Treatment at the Junction of Sanford Road and Milltown Road and New Pedestrian Entrance

(Source: Cameo and Partners Design Studio, 2021)

We note that the incorporation of permeable visual connections through the site and enhanced boundary treatments were a key consideration during the design process leading to greater public use of the space and represents a key planning gain for the wider community.

5.7 Trees

The Arboricultural Assessment, Arboricultural Impact and Tree Protection Strategy Report prepared by the CMK Horticulture & Arboriculture Ltd and enclosed as a separate document assesses the condition of the tree vegetation within the site and any impacts that may occur as a result of the proposed development. The Report is accompanied by Tree Survey and Constraints Plans, Tree Protection Plans and Arboricultural Impact Plans.

The Report notes:

'Design team meetings were strongly influenced by existing trees. The overall objectives are to retain the maximum number of good quality trees whilst also achieving densities of housing compliant with current standards and planning recommendations'.

Some 283 No. trees are proposed to be removed with the remaining 121 No. to be retained. Details of the proposed removal of trees is provided below:

Category	Number	% of total
A	4	1.4%
B	118	41.7%
C*	45	15.9%
C**	91	32.2%
U	25	8.8%

Table 3. Tree Removal Categories

Note: C*: Cat C trees removed to facilitate development.

C**: Cat C trees to be removed in the interests of improving the ecological and arboricultural value of open space areas.

The Report notes the following in relation to tree removal:

*'The direct impact of the proposed development (table 3) will necessitate the removal of 57.3% of the existing category B & C trees (refer to drawings TSAN001 104-106 RevG). Four category A trees will be removed. In addition, all category U trees (6.1%) will be removed or managed for ecological purposes. To improve the quality and usability of the open space areas to the north and east of the site the poor-quality category C** trees (8.8%) are recommended for removal. The rationale for the removal of these trees is outlined below.*

The removal of trees will be most pronounced on the western boundary and within the central section of the site where the main footprint of the development is located and where all the existing trees will be removed. The trees in these areas are primarily early-mature moderate value (category B) cherry, lime and holly.

The main concentrations of trees are on the eastern boundary with Milltown Road and to a lesser degree the northern boundary with Norwood Park. Both of these areas have been identified as having potential to provide high value recreational space for future residents with tree management central to this objective.

Currently the eastern area is dominated by self-seeded specimens (categories C & U) many of which are drawn up for light and poorly formed as a result. The very high density of trees, which is the result of limited management interventions, restricts light from penetrating the canopy thereby reducing the diversity potential of the ground flora and also the areas overall habitat and recreational potential.

The management objective here is to remove the low value trees (categories C & U) whilst retaining better-quality specimens (categories A & B) with the aim to improve the overall ecological and recreational potential of the area.'

Proposed new tree planting is contained within the accompanying Landscape Masterplan drawings by Cameo & Partners (some 238 No. large multi-stem and large shrubs are proposed to be planted), submitted as part of the planning package. The Standalone Tree Report prepared by Cameo and Partners notes that:

'The trees that will be removed will be replaced by a significant number of large and medium size trees that will have a greater long term benefit to local ecology and biodiversity. Our design will include native species trees and shrubs. Ground cover and understory layer will be set out to maximise local habitats for roosting birds and mammals. Proposed planting will be set-out to encourage and support the local bee and insect families. This too will include planting which supports berry, nuts etc for other mammals'.

We further note that a number of trees will be retained in close proximity to proposed buildings such as the mature Atlantic Blue Cedar (#110). The Arboricultural Report notes the following in relation to the Blue Cedar:

'It has been retained following extensive discussions between the project arboriculturist and the design team and has become an integral element of the proposed development. The building layout and associated services have been designed to be sympathetic to the tree and it's need for adequate canopy and root clearance. This species relatively slow growth will limit the trees potential impact on the building in terms of its structure and its open crown will allow light through for residents. As with all other trees on this site this tree will be monitored by the project arboriculturist during construction to ensure its protection and ongoing health. It is considered that the tree has the potential to be a very valuable landscape asset for the proposed development for many years to come and is worthy of the extensive efforts which have been undertaken to retain it within the site'.

Therefore, we submit that a key tenet of the proposed scheme has been to provide maximum protection to any trees worthy of retention within the subject lands while also benefiting the recreational potential of the site.

Bat boxes will also be installed on Tree Nos. 297, 324 and 352 and bird boxes will be installed on Tree Nos. 11, 175, 191 and 269 as detailed in the Biodiversity EIAR Chapter 8 prepared by JBA Consulting.

The Softscape Strategy prepared by Cameo and Partners within the Landscape Design Statement in tandem with CMK Horticulture and Arboriculture Ltd sets out the existing trees, trees to be removed, trees to be retained, newly proposed trees and the condition of the trees. The report also clarifies the need for removal of trees, i.e. for the useability of the public open space, location of buildings, services, new 2.4 metre high boundary wall etc.

We note a recent decision in relation to a Strategic Housing Development at Eglinton Road for 148 No. apartments (PL29S.307267) granted permission by An Bord Pleanála on 31st August 2020. The An Bord Pleanála Inspector noted the following in relation to trees:

'In relation to the trees, I note the Dublin City Tree Strategy 2016-2020 which asks that in the assessment of development, the maximum possible tree retention be sought. However, I consider that the retention of trees on site (and in the long term adjacent to the site on Eglinton Road), is not compatible with the proposed development. I note that there is no specific protection for the existing trees on the site and that 39 new trees, including Fastigiatae Oak, Cherry, Hazel, Pine and Birch will be included in the proposed development.

*The proposed development will include substantial new hedge and shrub planting along with 16 new trees along Eglinton Road, Donnybrook Road, and the corner to Brookvale Road. **The new tree planting on these boundaries will contribute to the public realm and it is my view that these new semi-mature trees will adequately replace the existing trees to be lost on the site that are currently visible from the street.** In addition, this new tree planting will form an adequate replacement for street trees on Eglinton Road, in recognition that the proposed works on the site will undoubtedly shorten the lifespan of those street trees. The remaining 23 new trees to be planted within the proposed development courtyard area will offer further adequate replacement for the other trees to be removed from the site. Overall, I consider that the proposed arrangements for tree removal and replacement on the site are acceptable.'*
 [Our Emphasis]

In summary, we consider that the removal of 283 No. trees, retention of 121 No. trees and introduction of 238 No. newly proposed trees/large multi-stem shrubs will result in an improved environment at the subject lands.

5.8 Roadworks

The proposed development includes road works on Sandford Road and Milltown Road adjacent to the existing access off Sandford Road and the proposed access of Milltown Road.

Milltown Road

The new Milltown Road access will be the principal vehicular access for the proposed development facilitating access to the basement car park, the forecourt adjacent to Tabor House and the duplex units and apartments along the western boundary (Block E). The majority of vehicular traffic from Milltown Road (92%-96%) will use the basement car parking via a ramp proximate to the site entrance (within c. 20 metres of the entrance) and this will ensure that the shared surface to the west of the site adjacent to the Block E duplexes and apartments will not be car dominated and will be a safe environment for all users. This new access will also facilitate pedestrians and cyclists.

The following details are provided in the Infrastructure Report prepared by DBFL Consulting Engineers and enclosed separately:

'This proposed site access shall operate as a priority junction with associated signage and line marking in accordance with the Department of Transport's Traffic Signs Manual.

A Toucan Crossing is also proposed provided in vicinity of the Milltown Road access to improve facilities for vulnerable road users.

Milltown Road has a posted speed limit of 50km/hour. The site entrance complies with minimum visibility splays as required by DMURS (Y Distance = 49m, X Distance = 2.4m).

Refer to Drawing No. 190226-DBFL-RD-SP-DR-C-1001 for the proposed site access layout at Milltown Road.'

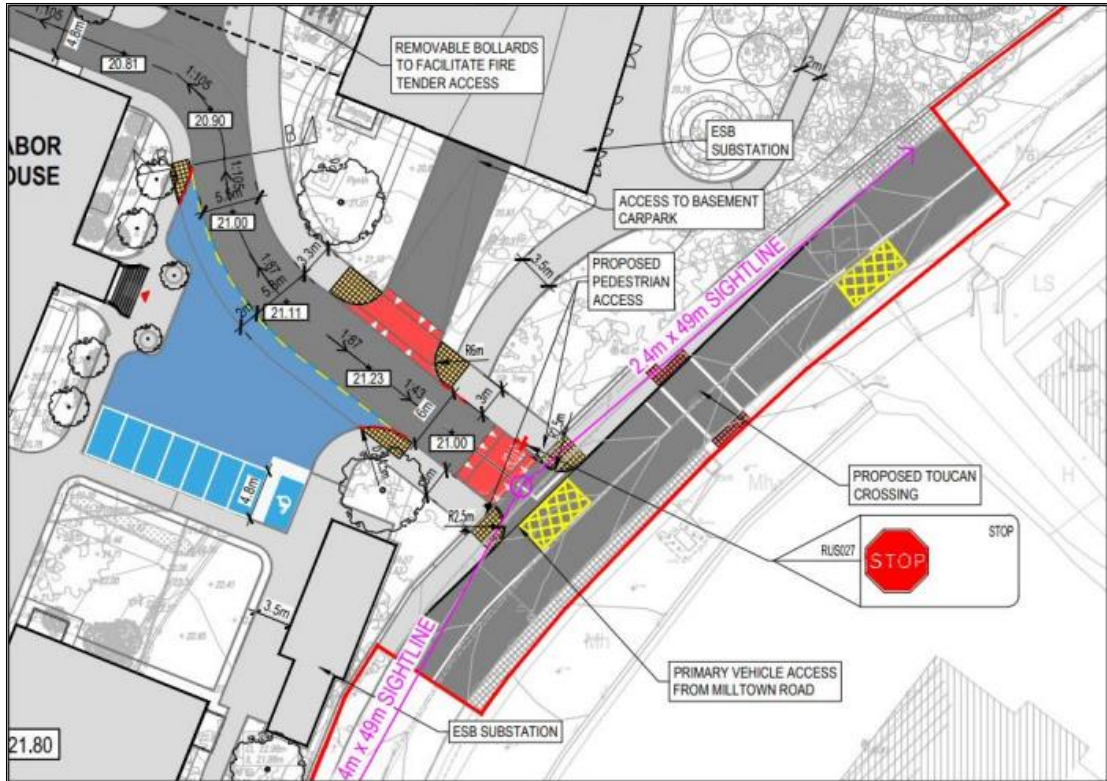


Figure 5.33: Milltown Road Works

(Source: DBFL Infrastructure Design Report, 2021)

Sandford Road

The existing access from Sandford Road will be utilised as the secondary vehicular access to the site, principally for deliveries, emergencies and taxis with a small element of mobility impaired parking and thus will have very minimal traffic movements. Fire tender access will also be provided from this entrance and pedestrian and cyclist access will also be facilitated. The existing vehicular gates and pedestrian gates at the Sandford Road entrance are being retained as decorative features and compliant pedestrian access points will be added adjacent to the entrance. The existing vehicular gates at the Sandford Road access will be open at all times.

The following details are provided in the Infrastructure Report prepared by DBFL Consulting Engineers and enclosed separately:

'As such, improvements to pedestrian facilities at the Sandford Road / Belmont Avenue junction are proposed (upgrading of the existing pedestrian crossing on Sandford Road, amendments to line marking at the junction, improved tactile paving and reduction of corner radii).

There is no vehicular access from Sandford Road to the basement carpark, the forecourt area adjacent to Tabor House and the duplex units along the western boundary (which are all served exclusively from Milltown Road).

Refer to Drawing No. 190226-DBFL-RD-SP-DR-C-1001 for the proposed site access layout at Milltown Road.'

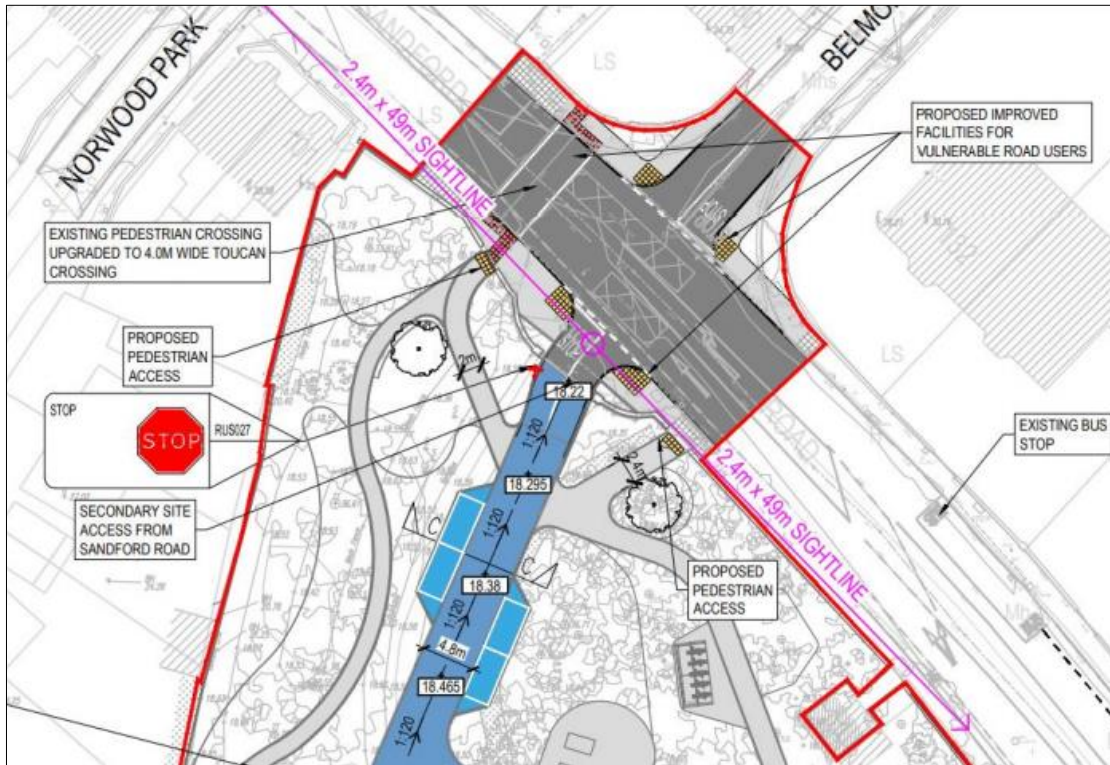


Figure 5.32: Sanford Road Works

(Source: DBFL Infrastructure Design Report, 2021)

5.9 Drainage Works

As detailed by DBFL Consulting Engineers in the separately enclosed Infrastructure Report, an existing 225 mm diameter surface water drain is located approximately 80 metres from the eastern corner of the site on Eglinton Road. DBFL note the following:

'It is proposed to discharge attenuated flows from the site to the existing drainage network on Eglinton Road (approximately 200m from the Sanford Road / Eglinton Road junction where the public line increases to a 300mm diameter pipe).'

The public surface water network on Eglinton Road (as described above in Section 3.1) will provide a suitable surface water discharge point for the proposed development. However, in order to achieve the required drainage invert levels on site, approximately 160m of the existing drainage network along Eglinton Road will need to be replaced with a 300mm pipe running at a flatter gradient. The total length of the surface water outfall from the point it crosses the developable site boundary at Milltown Road to the discharge point on Eglinton Road is approximately 300m.'

Please refer to the Infrastructure Report prepared by DBFL Consulting Engineers for full details.

5.10 Summary of Proposed Development

As set out throughout this section, the proposed development will provide a high-quality scheme principally providing 671 No. residential units, residential support facilities and amenities, a large quantum of public and communal open spaces and a creche.

The scheme layout has been carefully considered particularly having regard to the reuse of Tabor House and the Chapel within the development and the requirement to provide 25% public open space. In addition, the building heights have been carefully modulated throughout the site providing appropriate setbacks from neighbouring properties. It is our opinion that the proposed density of 157.5 No. units per Hectare on this serviced land is not challenging especially as the site can accommodate the proposed density because of the extensive quantum of public and communal open space provided throughout the site.

We note that the total public open space represents 34.9% of the wider site area and the total communal open space represents 12.8% of the site area. The total public and communal open space provided represents c. 47.7% of the developable site area. Therefore, the full 34.9% of public open space is fully accessible to the future residents and the wider community, representing a significant planning gain for the area.

6.0 PLANNING POLICY CONTEXT

6.1 Relevant Development Management Standards

The purpose of this section is to detail the relevant current development policy and guidelines applicable in relation to the proposed development at the subject site. The Statement of Consistency submitted with this planning application sets out a full and detailed assessment of the consistency of the proposed development with national, regional and local policy.

The key national documents in assessing the subject scheme are:

- *National Planning Framework – Project Ireland 2040* (“NPF”);
- *Urban Development and Building Heights Guidelines for Planning Authorities, December 2018* (“Building Height Guidelines”); and
- *Sustainable Urban Housing Design Standards for New Apartments, Guidelines for Planning Authorities, December 2020* (“Apartment Guidelines, 2020”).

At a local level, the *Dublin City Development Plan 2016 – 2022* (“Development Plan”) is the statutory plan for the area and guides development relating to the subject site.

6.2 National Policy

6.2.1 National Planning Framework – Project Ireland 2040

The *National Planning Framework* (“NPF”) was published in February 2018 and is the Government’s high-level strategic plan for shaping the future growth and development of Ireland to the year 2040. The proposed development has been designed in accordance with the objectives of the NPF. Section 2.2 of the NPF sets out an overview of the NPF Strategy which includes reference to ‘Compact Growth’ as follows:

- ***Targeting a greater proportion (40%) of future housing development to be within and close to the existing ‘footprint’ of built-up areas.*** [Our Emphasis]
- ***Making better use of under-utilised land and buildings, including ‘infill’, ‘brownfield’ and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport’*** [Our Emphasis]

The NPF expressly seeks the densification of accessible, brownfield, infill sites close to public transport and services and facilities such as the subject site. National Policy Objective 35 states that it is an objective to:

‘Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.’ [Our Emphasis]

The NPF also sets out the following regarding future growth needs:

'Increased residential densities are required in our urban areas...to more effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need to build inwards and upwards, rather than outwards. This means that apartments will need to become a more prevalent form of housing, particularly in Ireland's cities.' [Our Emphasis]

Therefore, it is our opinion that the *NPF* supports the provision of the proposed development (principally comprising 671 No. residential units with ancillary support facilities and amenities in addition to a creche) through increased density and height at the subject site having regard to the underutilised status of the site in close proximity to public transport, employment locations as well as a range of services and facilities to serve the future tenants.

6.2.2 *Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)*

The *Building Height Guidelines* set out that a key objective of the *NPF* is to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels.

The Minister's foreword to the *Building Height Guidelines* acknowledges that Ireland's classic development models for city and town cores has tended to be dominated by employment and retail uses, surrounded by extensive and constantly expanding low-rise suburban residential areas. This is regarded in the guidelines and literature as an unsustainable model in need of proactive and inventive solutions.

The *Building Height Guidelines* state that there is an opportunity for our cities and towns to be developed differently. Urban centres could have much better use of land, facilitating well located and taller buildings, meeting the highest architectural and planning standards. The *Building Height Guidelines* note that:

'A key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels.' [Our Emphasis].

These *Building Height Guidelines* are intended to set a new and more responsive policy and regulatory framework for planning the growth and development of cities and towns upwards rather than outwards. The *Building Height Guidelines* note that increasing prevailing building heights has a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing both the scale and density of development and our planning process must actively address how this objective will be secured.

The *Building Height Guidelines* also note the following:

'In relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate

urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility. [Our Emphasis]

The subject site is well served by public transport with a range of Luas stops (such as Beechwood - 1 Km/c. 13 minutes walking distance) and Dublin Bus stops located in close proximity to the subject site as set out in Sections 2.2, 3.4.2 and 7.2.3 of this Report.

The availability of public transport allows easy access to significant employment locations such as Dublin City Centre, the Canal, the Docklands, Harcourt Street, Sandyford Business District for example, many of which are also within cycling and walking distance of the subject site.

As such, it is considered that the proposed development principally providing heights of 2 to 10 No. storeys and comprising 671 No. units at the subject site represents the proper planning and sustainable development of the area as density and heights must be increased in appropriate core urban locations that have access to public transport.

It is considered that the subject lands are ideally located to accommodate increased density without having adverse impacts on the receiving environment. As per the *Building Heights Guidelines*, this is demonstrated in the application documents including Daylight and Sunlight Assessment Report and a Landscape and Visual Impact Assessment. The proposed development is fully in accordance with the Specific Planning Policy Requirements set out in the *Building Height Guidelines* which is detailed extensively in the Statement of Consistency enclosed.

We submit that the development as proposed is in accordance with the clear direction in recent national legislation to increase height and density in appropriate locations and the proposed development can be successfully assimilated into its context.

For completeness, the *Development Plan* was made before these *Building Height Guidelines* were published. The Development Management Principles in the Guidelines, at paragraph 3.1, state that it is Government policy that building heights must generally be increased and that planning authorities must apply certain broad principles when considering development proposals for buildings taller than prevailing building heights in pursuit of the Guidelines. The third bullet of paragraph 3.1 requires consideration to whether the implementation of the pre-existing policies of a plan that predates the Guidelines align with and support the objectives and policies of the *NPF*. The *NPF* is considered above. As they were made before the *NPF* and *Building Height Guidelines* were published, the pre-existing policies in relation to height do not align. There is no doubt, therefore, that the Specific Planning Policy Requirements ("*SPPR*") in the Guidelines are relevant to the assessment of this proposed development.

6.2.3 *Sustainable Urban Housing Design Standards for New Apartments, Guidelines for Planning Authorities, December 2020 ("Apartment Guidelines, 2020")*

The Department of Housing, Planning and Local Government published the updated *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities* in December 2020 ("*Apartment Guidelines, 2020*").

The purpose of the *Apartment Guidelines, 2020* is to reiterate ministerial guidance, setting out standards for apartment developments, mainly in response to circumstances that had arisen whereby some local authority standards were at odds with national guidance. These *Apartment Guidelines, 2020* build on the content of the *Apartment Guidelines, 2015* particularly in relation to design quality safeguards such as internal spaces standards for 1, 2 and 3 No. bedroom apartments, floor to ceiling height, internal storage and amenity space.

The *Apartment Guidelines, 2020 and 2018* update previous guidance in the context of greater evidence and knowledge of current and likely future housing demand in Ireland taking account of the Housing Agency National Statement on Housing Demand and Supply and projected need for additional housing supply. The Government's *Rebuilding Ireland – Action Plan for Homelessness, 2016* ("Rebuilding Ireland") and the *National Planning Framework – Ireland 2040* ("NPF") have both been published since the 2015 Guidelines. The Specific Planning Policy Requirements of the *Apartment Guidelines, 2020* take precedence over any conflicting policies and objectives of development plans, local area plans and strategic development zone planning schemes.

The Build-to-Rent model is a new model of housing delivery within the Irish planning system as defined by policy within the *Apartment Guidelines, 2020*. It is defined as the following:

'Purpose-built residential accommodation and associated amenities built specifically for long-term rental that is managed and serviced in an institutional manner by an institutional landlord'.

Build-to-Rent as a housing typology offers the opportunity to accelerate the delivery of new housing and provide enhanced security of tenure to future residents. The proposed development includes 604 No. Build-to-Rent units which will contribute towards allowing Build-to-Rent to emerge as its own residential segment within the functional area of Dublin City Council.

The *Apartment Guidelines, 2020* recognises the need for alternative types of accommodation to facilitate the societal and economic changes which would be better suited to reflect current and evolving household formation and housing demand. The proposed application comprising 604 No. Build-to-Rent units and 67 No. Build-to-Sell units will therefore provide flexible and permanent housing accommodation types for people seeking residential accommodation in Dublin or seeking to purchase a home.

Having regard to the location of the site by virtue of its accessibility by walking, cycling and proximity to excellent public transport links which provides easy access to significant employment locations and business districts, the site can be described as a 'Central and/or Accessible Urban Location' as defined by Section 2.1.1 of the *Apartment Guidelines, 2020*.

Specific Planning Policy Requirement 7

Specific Planning Policy Requirement 7 (SPPR7) of the *Apartment Guidelines, 2020* provides as follows:

BTR development must be:

- (a) Described in the public notices associated with a planning application specifically as a 'Build-To-Rent' housing development that unambiguously categorises the project (or part of thereof) as a long-term rental housing scheme, to be accompanied by a proposed covenant or legal agreement further to which appropriate planning conditions may be attached to any grant of permission to ensure that the development remains as such. Such conditions include a requirement that the development remains owned and operated by an institutional entity and that this status will continue to apply for a minimum period of not less than 15 years and that similarly no individual residential units are sold or rented separately for that period;
- (b) Accompanied by detailed proposals for supporting communal and recreational amenities to be provided as part of the BTR development. These facilities to be categorised as:
 - (i) Resident Support Facilities - comprising of facilities related to the operation of the development for residents such as laundry facilities, concierge and management facilities, maintenance/repair services, waste management facilities, etc.
 - (ii) Resident Services and Amenities – comprising of facilities for communal recreational and other activities by residents including sports facilities, shared TV/lounge areas, work/study spaces, function rooms for use as private dining and kitchen facilities, etc.

In response to part (a), the scheme is described as Build-to-Rent in the Statutory Notice and a Legal Covenant is enclosed with the planning application. As per part (a) the requirement that the development remains owned and operated by an institutional entity and that this status will continue to apply for a minimum period of not less than 15 years and that similarly no individual residential units are sold or rented separately for that period will apply to the Build-to-Rent units. As the scheme is part Build-to-Sell, this is also referenced in the Notices.

In relation to part (b) of SPPR7, the proposed scheme will provide high-quality resident support facilities and support services and amenities as follows:

	Amenities	Sq m	Facilities	Sq m
Block A1 - GF	Lounge, Reading room	198.8	Concierge, Mail, WC	70.7
Block A1 - 04	Residents club	111.4		
Block B - GF	Lounge, Reading room	52.1	Concierge & Mail	45.6
Block B - 05	Residents Lounge	117.4		
Block C - GF	Co- working space	115.1		
Tabor House - GF	Lounge	15.2		
Tabor House - 01		0	Lobby & Mail	18.8

The Chapel GF (Residents Hub)	Gym, Games rooms, Kitchen, Garden room	288.9	Staff facilities	23.2
The Chapel 01 (Residents Hub)	Lounge, co working, Meeting room, Multipurpose space	349.9		
TOTAL		1248.8		158.3

As shown in the table above, the proposed development provides high quality amenity areas such as lounges and reading rooms in Blocks A1 and B, co-working space in Block C and gym, games room, lounge and multi-purpose hall in the Chapel. These spaces will include shared kitchen spaces/coffee docks, workstations and seating such as within the lounges. In addition, facilities such as a concierge and mail room will be provided in Blocks A1 and B and lobby and mail room in Tabor House. All apartments will be provided with a washing machine therefore a laundry facility is not required.

We have been advised that the Applicant are operating developers whose intention is to hold the assets long term and as such have designed them to international operating standards. Representatives of the Applicant have travelled extensively looking at projects in other countries. A key element of successful Build-to-Rent offerings in particular is to provide useable and well managed tenant amenities that ultimately contribute to providing high-quality residential accommodation and a successful and integrated community setting.

It also will provide public open space totaling 14,848 sq m which represents 34.9% of the developable site area and communal open space totaling 5,875 sq m including upper level terraces. The communal open space at surface level (5,444 sq m) excluding upper level terraces of 431 sq m represents 12.8% of the site area. This total provision of public and communal open space at surface level (47.7% of the site area) in addition to upper level communal terraces, will ensure that a high-quality standard of living that encourages social interaction will be provided for the future tenants.

Specific Planning Policy Requirement 8

For proposals that qualify as specific BTR development in accordance with SPPR 7:

- (i) No restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise;
- (ii) Flexibility shall apply in relation to the provision of a proportion of the storage and private amenity space associated with individual units as set out in Appendix 1 and in relation to the provision of all of the communal amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities within the development. This shall be at the discretion of the planning authority. In all cases the obligation will be on the project proposer to demonstrate the overall quality of the facilities provided and that residents will enjoy an enhanced overall standard of amenity;
- (iii) There shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services. The requirement for a BTR scheme to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures;
- (iv) The requirement that the majority of all apartments in a proposed scheme exceed the minimum floor area standards by a minimum of 10% shall not apply to BTR schemes;
- (v) The requirement for a maximum of 12 apartments per floor per core shall not apply to BTR schemes, subject to overall design quality and compliance with building regulations.

1. The Built-to-Rent element provides 88 No. studios, 262 No. one bed apartments, 242 No. two bed apartments and 12 No. three bed apartments;
2. The majority of the proposed Build-to-Rent Apartments meet and in some cases, exceed the standards set out in relation to storage and private amenity space.

The majority of the Build-to-Rent apartments benefit from private balconies, with the exception of the 79 No. studio and 1 bed units proposed (including 10 No. studios and 8 No. 1 beds in Tabor House). Each new build studio unit will be provided with a Juliet balcony and it is considered appropriate to avoid providing any balconies in Tabor House to ensure that the character of the existing historic building is retained. The majority of units will be provided with storage space in line with the *Apartment Guidelines, 2020* except for 14 No. studios units within Tabor House. However, as this is an existing historic structure that is being refurbished to provide residential units, we consider this slight shortfall to be acceptable.

The scheme provides 14,848 sq m of public open space in addition to communal open space and upper level terraces totalling 5,875 sq m which will adequately

address the needs of future residents. We note that internal communal amenity spaces (c. 1,248.8 sq m) will also be provided.

Therefore, this significant quantum of public and communal open spaces provided will be more than sufficient to cater for the proposed development including units without balconies, and this flexibility is allowed by SPPR8 (ii) above. For example, there is an average of 10.62 sq m per unit of communal external and internal amenity space provided for entire development which will suitably cater for the proposed development, in addition to the extensive provision of public open space representing 34.9% of the developable site.

3. The site is located in a central and accessible urban location as discussed earlier in this section therefore reduced car parking is proposed (ratio of 0.50 No. per unit proposed for the entire development); and
4. The majority of apartments meet the minimum floor standards, and in some cases exceed the minimum floor area by 10%, although this is not a criterion of Build-to-Rent. We note that 14 No. studios positioned within the existing Tabor House do not meet the required floor area. As this is an existing historic building, we consider the provision of some studios ranging in size from 34.6 sq m to 35.5 sq m in this instance to be acceptable. Flexibility is allowed in relation to existing historic buildings as per Section 2.2 and 6.9 of the *Apartment Guidelines, 2020* (please see the enclosed Material Contravention Statement for information).

The subject Build-to-Rent elements of the scheme is fully in accordance and consistent with the criteria set out in the *Apartment Guidelines, 2020* and overall, the scheme is in compliance with the *Apartment Guidelines, 2020*.

A full assessment of the scheme's compliance with the SPPRs in the *Apartment Guidelines, 2020* (for Build-to-Sell and Build-to-Rent) is provided in the enclosed Statement of Consistency prepared by Thornton O'Connor Town Planning.

6.3 Dublin City Development Plan 2016-2022

6.3.1 Zoning

The subject site is zoned Z15 'Institutional and Community' in the Dublin City Council Development Plan 2016-2022 where the stated aim is 'to protect and provide for institutional and community uses'. Please see Figure 6.1 below with the subject application site annotated indicatively in red, noting that the road and infrastructure works proposed on Milltown Road, Sandford Road and Eglinton Road are also outlined in red.

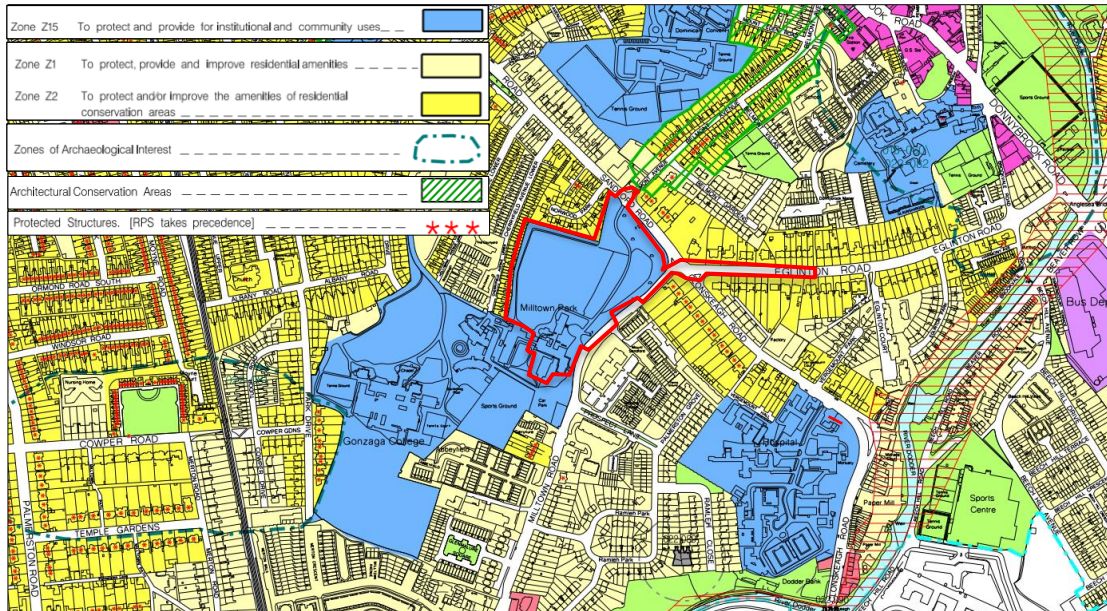


Figure 6.1: Zoning Map Demonstrating the Location of the Subject Site

(Source: *Dublin City Council Development Plan 2016-2022*, annotated by Thornton O'Connor Town Planning, 2021)

Please see the image below in Figure 6.2 prepared from O' Mahony Pike Architects, which highlights the land uses across the entirety of the Z15 lands.



Figure 6.2: Image Demonstrating the Land Uses of the Entire Z15 Land Zoning at the Subject Location

(Source: O' Mahony Pike Architects, 2021)

In summary the Z15 lands can be broken down as follows:

1. Application Site

Building range within the subject red line boundary which were formally utilised by the Jesuit Community at Milltown Park for institutional purposes from the 1850s. It has been confirmed by the Jesuit Community that the lands are surplus to their requirements due to a decline in vocations and are no longer required for the purposes of its function and mission. As a result, the buildings are currently vacant and have become impossible to maintain. It is noted that these lands were always in private use and the buildings and the lands subject to development were never publicly accessible lands.

2. Milltown Park Campus (Retained Jesuit Lands)

The Jesuits will retain these institutional lands to the south/south-west of the proposed development, which addresses their future operational needs due to this decline in vocations, and they will also retain the separate access already established from Milltown Road. The Jesuits have invested substantially in these lands in recent years to cater for their future operational needs in terms of residential accommodation and

training. These lands currently comprise the Cherryfield Lodge Nursing Home and Milltown Park Community House. We note that a 2.4 metre high boundary wall is proposed to separate the proposed development from the retained Jesuit lands. The proposed development can facilitate future potential links to the remaining institutional lands through the wall should this be required in the future, if the retained Jesuit lands become further surplus to requirements and are redeveloped.

3. Gonzaga College

The third parcel of land within the Z15 landholding is occupied by the Gonzaga College Secondary School. Gonzaga School has always been a separate use and the lands were purchased at a later date to the main Jesuit campus in the 1950s. The subject development building range and lands and the school are separated functionally and physically from the other. The tenuous relationship between the subject group and the school in particular will therefore be unaffected by the severance of links between the two.

The application site does not contain any Protected Structures or any other conservation designations, although the Belmont Avenue/Mount Eden Road Architectural Conservation Area is located to the north of the site and neighbouring dwellings in Norwood Park and Cherryfield Avenue Upper and Lower are zoned Z2 – Residential Conservation Areas. There are Protected Structures located to the north on the opposite side of Sandford Road; to the west along Sandford Road; to the east along Clonskeagh Road; and to the south along Milltown Road. A full list of potential impacts is provided in Chapter 7 of this EIAR (Architectural Heritage) prepared by Molloy and Associates Conservation Architects and in Chapter 9 of this EIAR (Landscape and Visual Impact Assessment) prepared by Modelworks.

The *Development Plan* states that lands zoned Z15 are predominantly large blocks of land consisting of buildings and associated open spaces. These lands are generally located in the suburbs of Dublin City. The present use on the lands generally include community-related development including schools, colleges, resident institutions and healthcare institutions such as hospitals.

In relation to the land-use zoning objective for lands zoned Z15, the *Development Plan* states that:

'These lands play an important role in the achievement of a more compact city in that they contribute to the creation of vibrant neighbourhoods and a sustainable well-connected city through the provision of such infrastructure as schools, hospitals and open space. The city also includes nationally important institutions, such as hospitals and educational facilities, which as stated in Section 14.1 – Zoning principles, is Council policy to cooperate with, in order to promote the strategic long-term needs of the city and the country.'

The subject lands have not been in institutional use since 2015 when the institutional operations on the site ceased permanently, and the property was vacated by the Jesuits in 2019. A letter has been received from the Jesuit Community which confirms that *'the former Jesuit Community property...is no longer required by the Society for the purposes of its functions and mission'*. The Jesuit Community has *'experienced a dramatic decline and falling vocations leading the Society to close these facilities and seek other options for training of priests'*. This letter also confirms that the application lands have become surplus to their requirements and are impossible to maintain. The Jesuit Community is retaining the residential and

administration accommodation to the south of the application lands with separate access already established from Milltown Road. Unlike some of the other Z15 sites, the application site has always been in private use and is not open or accessible to the public and has never provided any community facilities on site. The public have never enjoyed any right of access to these privately owned lands.

The Development Plan notes that where there is an existing institutional and/or community use, any proposed development for 'Open for Consideration' uses (which include residential) on part of the landholding, is required to demonstrate to the Planning Authority:

1. How the proposal is in accordance with and assists in securing the aims of the zoning objective;
2. How it secures the retention of the main institutional and community uses on the lands, including space for any necessary expansion of such uses;
3. How it secures the retention of existing functional open space e.g. school playing fields; and
4. The manner in which the nature and scale of the proposal integrates with surrounding lands.

Since 2019, the subject lands are no longer in active use by the Jesuit order. However, in light of the continuing zoning objective and need for development on the lands to comply with the requirements in relation to Z15 zoning, notwithstanding the lands are no longer in active use, we have provided a response to each Z15 zoning criterion below:

1. How the proposal is in accordance with and assists in securing the aims of the zoning objective

The site is zoned Z15 'Institutional and Community' which aims 'to protect and provide for institutional and community uses'.

We note that the entire Z15 land holding can be broken down as follows:

1. The Application Site (lands and buildings formally used by the Jesuit Community for Institutional purposes which have been sold to the Applicant);
2. The 'Retained Jesuit Community Lands' (The Lands that have been retained by the Jesuit Community which have been confirmed as adequate for their future operational needs); and
3. The Gonzaga College Secondary School.

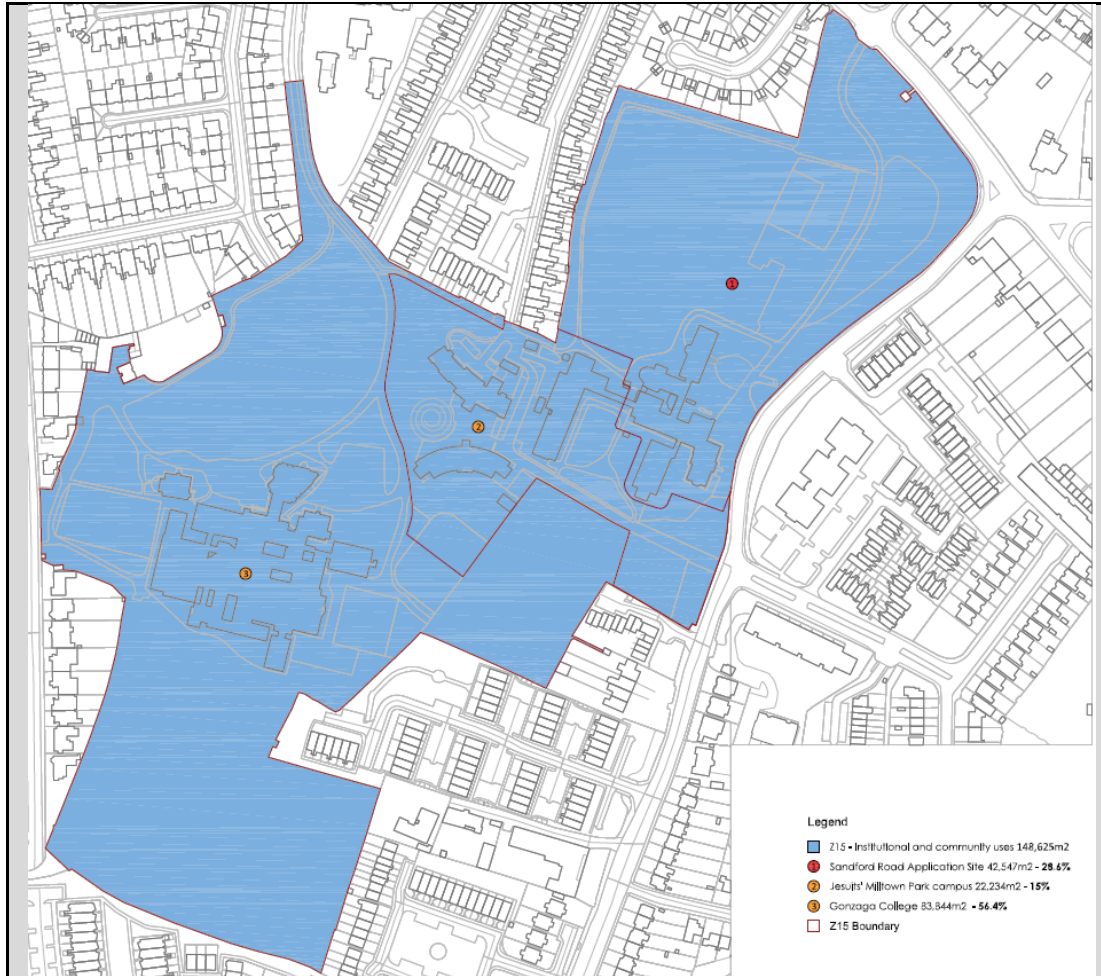


Figure 6.3: Image Demonstrating the Land Uses of the Entire Z15 Land Zoning at the Subject Location

(Source: O' Mahony Pike Architects Dwg No. 19031-OMP-ZZ-ZZ-DR-A-1010, 2021)

The area of the entire Z15 land holding including the 3 No. different parcels of land highlighted above is c. 148,625 sq m/ c. 14.86 Ha. With the proposed development in place at the application site (Parcel No. 1), 71.4% of the Institutional uses will still remain on the entire Z15 lands.

We reiterate that the former institutional lands and buildings at the application site (Land Parcel No. 1) are vacant and are no longer required by the Jesuit Community, with the Jesuit's retaining the lands they require within Parcel No. 2 for the current and future needs. Available land has been held by the Institutional landholders that may be developed in future if required (i.e. open spaces retained by the Jesuits and Gonzaga).

The Gonzaga site which is in separate ownership is a large site with plenty of room to expand if required as evidenced on Figure 6.3. It is noted that the existing Gonzaga College is not located on part of the historical Milltown Park site. Rather, Gonzaga is located on the former Bewley estate and was purchased by Gonzaga for the school in 1950. Thus, historically, the Z15 lands comprised two distinct use and owners, Gonzaga lands and the Jesuit's lands.

Figure 6.4 below demonstrates that when the application site is developed, the entirety of the Z15 will still provide significantly more than 25% open space across the entirety of the Z15 lands, with 58.7% open space provided across the entire extent of the Z15 lands. It is important to note that the public have never enjoyed any right of access to these privately owned lands. The subject application serves to open up the lands within the Applicant’s control for the first time, providing 34.9% of their site as open space that will be available to the community¹⁴ (details on extent and layout of public open space provided in this section below).

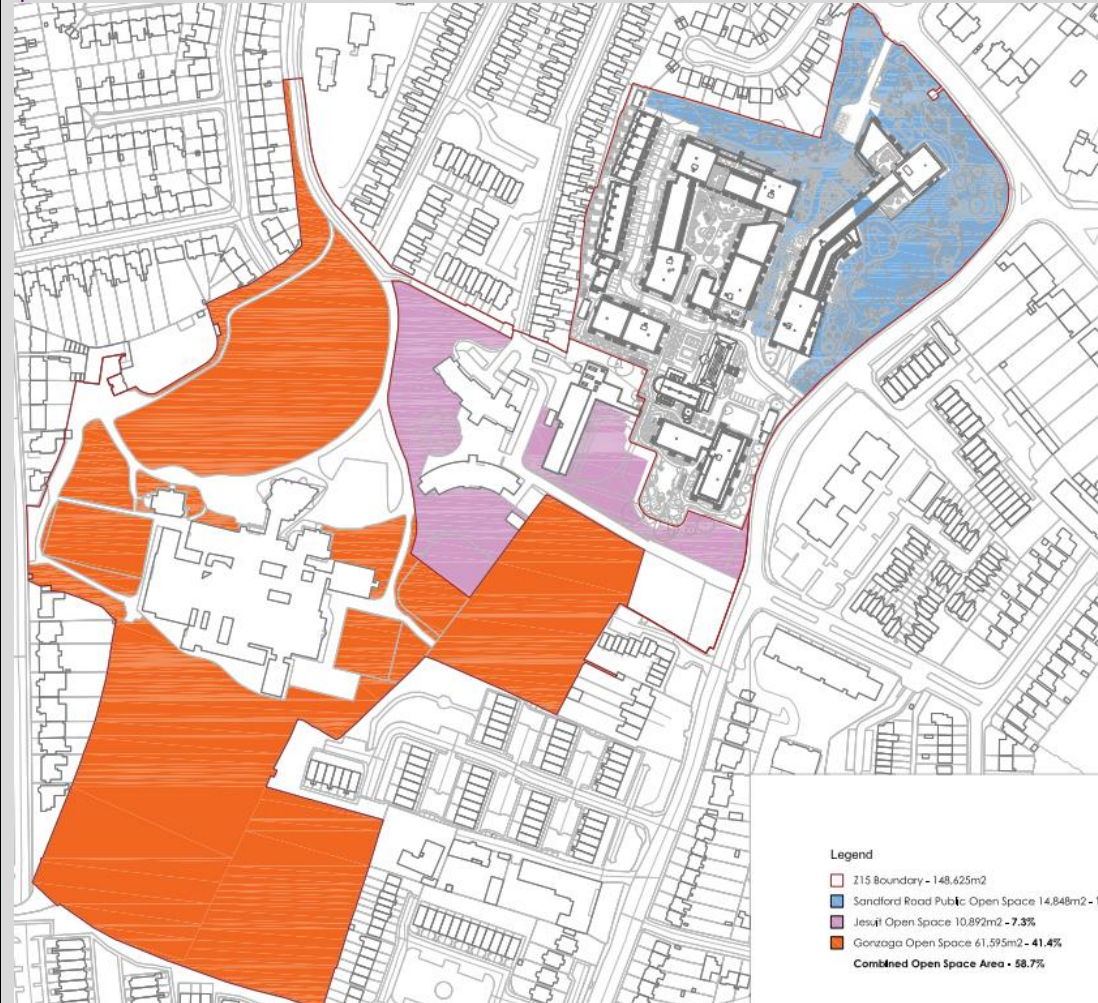


Figure 6.4: OS Map Demonstrating in Excess of 25% Open Space (58.7%) Will Still be Provided Across the Wider Z15 Lands with the Development in Place

(Source: O’ Mahony Pike Architects, Dwg No. 19037-OMP-ZZ-ZZ-DR-A-1013, 2021)

The *Development Plan* notes the following in relation to Z15 lands:

‘They often provide ancillary and incidental activities for the local community such as use of part of the site for recreational purposes or the use of rooms for local meetings. These lands play an important role in the achievement of a more

¹⁴ Please note that any reference to open space in this section excludes the provision of communal open space on the application lands.

compact city in that they contribute to the creation of vibrant neighbourhoods and a sustainable well connected city through the provision of such infrastructure as schools, hospitals and open space’.

The opening up of the site to the public will provide significant additional open space for the surrounding local community to utilise for recreational purposes, which will provide a vibrant neighbourhood, will enhance legibility in the area and will provide large areas of open space for the public and residents to enjoy and thus contributing towards providing a sustainable well connected city. Some elements of the public open space that will be created as part of the development includes publicly accessible walkways, grassland, benches, a jogging route, fitness areas and play-on-the-way for example.



Figure 6.5: CGI of Part of the Public Open Space Showing People Jogging, Walking and Kids Playing

(Source: 3D Design Bureau, 2021)



Figure 6.6: Illustration of Part of the Public Open Space Showing Seating Areas, Cyclists and Kids Playing

(Source: Cameo and Partners, 2021)

2. How it secures the retention of the main institutional and community uses on the lands, including space for any necessary expansion of such uses

As noted previously, a letter has been received from the Jesuit Community which confirms that the lands sold to the Applicant are no longer required by the Community due to a decline in vocations. The Jesuit Community have retained the institutional lands/buildings on land parcel No. 2 which address their future operational needs and have invested in these retained lands which shows their commitment to this location. Therefore, it is clear that much of the Z15 lands will remain in institutional use and as there is no longer an active institutional use at the development site, there will be no net loss of institutional uses.

It has been confirmed by the Jesuit Community that the application lands are surplus to their requirements due to a decline in vocations and are no longer required for the purposes of its function and mission and are vacant and have become impossible to maintain. Therefore, the Jesuit Community do not require the lands for their current needs or for any expansion which ultimately led to the sale of the application lands to the Applicant. Available land has been held by the Institutional landholders that may be developed in future if required (i.e. open spaces retained by the Jesuits and Gonzaga).

The Community have also confirmed that the application lands and the 'retained lands' have never been in public use nor publicly accessible. The Masterplan facilitates a future link from the application site to the remaining Institutional Jesuit lands should this link be required at a future date.

We note that 39.5% of open space will be provided on the application lands and the 'retained Jesuit lands' (i.e. lands under the control of the Jesuit's and lands under the control of the Applicant) after the proposed scheme has been implemented. See Map below prepared by OMP Architects:

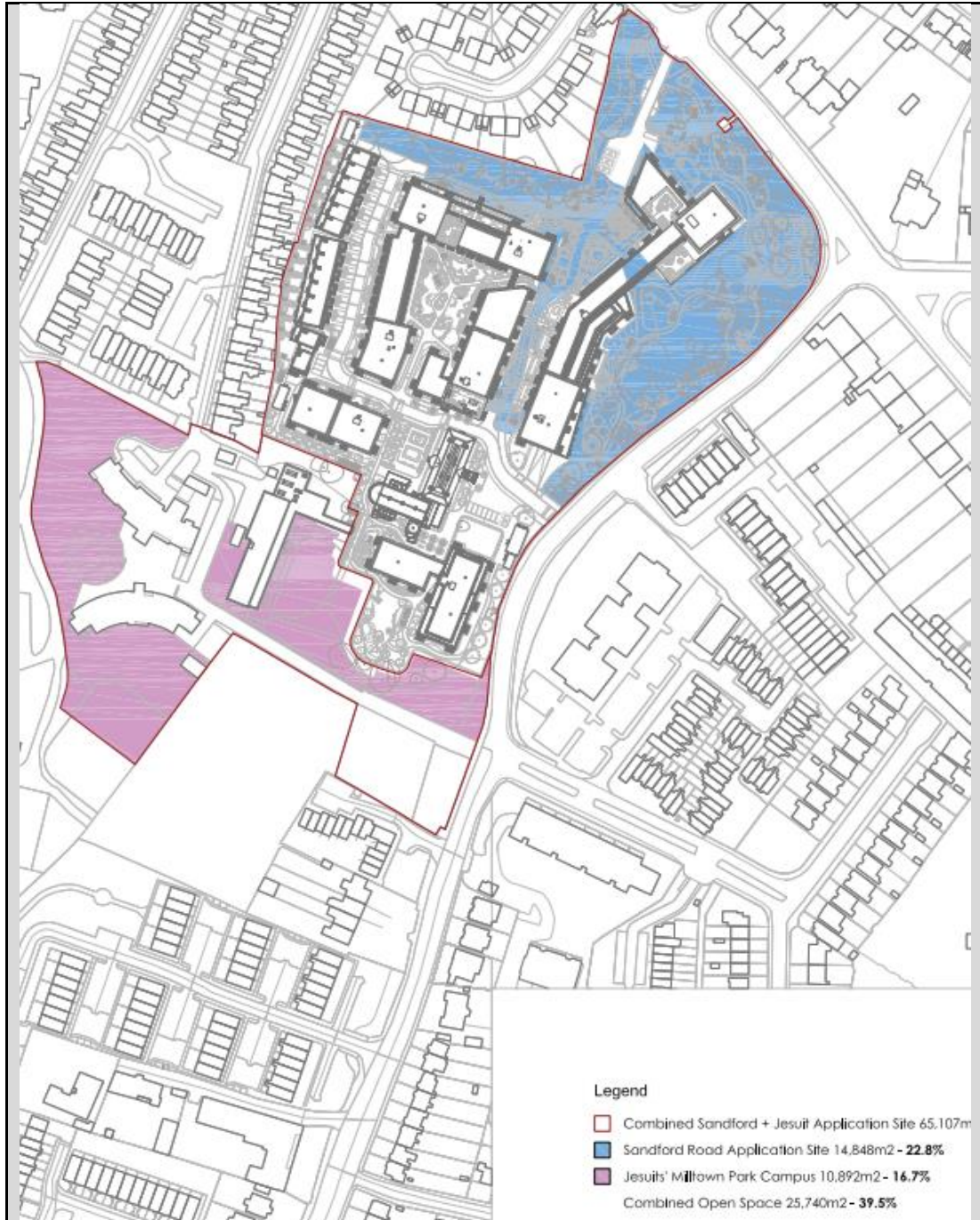


Figure 6.7: OS Map Demonstrating 25% Open Space Will Still be Provided Across the Application Lands and the remaining Jesuit Community lands

(Source: OMP Architects, Dwg No. 19037-OMP-ZZ-ZZ-DR-A-1017, 2021)

3. How it secures the retention of existing functional open space

The current site contains c. 22,249 sq m open space of limited amenity or recreational value, which is not accessible to the public (not including the overgrown and inaccessible areas along the north/eastern boundary). The space along the north/eastern boundaries is currently overgrown and the remaining space is of very limited amenity or recreational value. The public have never enjoyed any right of access to these privately owned lands. In the event that permission is granted, access will be opened up to the public to the 14,848

sq m of public open space to be provided as part of the development. The proposed development would involve construction of buildings, with much of the parkland and wooded area benefiting from landscaping works, to open it up and make it useable for the public and residents. The proposed development would result in 14,848 sq m of highly accessible landscaped parkland and open space.

It is noted that the proposed development will not 'remove' existing functional open space from Z15 Institutional lands as none of the lands within the Z15 zoning have ever been publicly accessible as they have all been privately owned heretofore. On the contrary, the development will provide significant new public open space at the application lands for the first time, which can be utilised and enjoyed by the wider community.

The proposed development will transform the large overgrown and dark parkland along the eastern boundary of the site into a high-quality and usable public park for residents and the wider public to utilise, which is linked through the triple height undercroft of Block A1 to a plaza area where vehicular access is not allowed. The scheme also provides additional public open space along the northern boundary and through the boulevard area between Blocks A and B, which facilitates pedestrian and cycle access through the site from Milltown Road to Sandford Road.

The opening up of the site to the public will provide significant additional open space for the surrounding neighbourhood to utilise, which is a significant planning gain given that the lands have been historically closed up (and are currently closed up) from the public. This will improve the public open space provision at the subject Z15 lands rather than simply securing the retention of existing functional open space (which is currently only available for private use). In addition, we note that there are multiple pedestrian points provided to access the public open space from outside the site. The public open space incorporated into the scheme will provide a wide variety of activities such as publicly accessible walkways, grassland, benches, jogging route, fitness areas and play-on-the-way for example, which may be enjoyed by residents and wider members of the public.

4. The manner in which the nature and scale of the proposal integrates with surrounding lands

The scheme layout will improve legibility in the area and the proposed development will integrate into the surrounding context having regard to the large open spaces, the permeable links, the height transitions, the setbacks provided from boundaries and the breakdown in massing proposed. The scheme is in accordance with Section 14.7 of the *Development Plan*, which notes that abrupt transitions in scale and use should be avoided in areas proximate to other zoning objectives. The development has set back much of the development from the surrounding areas having regard to public open space and roads and in addition, the western boundary is made up of modest 3 No. storey buildings for example, which highlights that the proposed development has appropriately considered the transition between the development and surrounding spaces. Section 16.10 of the *Development Plan* has also been duly considered during the preparation of this planning application to ensure the proposal will integrate with surrounding lands i.e. such as in relation to aspect, natural lighting, sunlight, layout and private open space.

The rejuvenation and integration of the Chapel and Tabor House within the development will also contribute towards the assimilation of the scheme into the surrounding environment and the improved character of these structures will benefit from enhanced

views via the newly proposed entrance from Milltown Road. A significant effort has been made by the Design Team to provide well considered and interesting building forms which enhances legibility, wayfinding and connectivity within the site for future residents and the existing wider area and thus will appropriately integrate with the surrounding area.

We note that the *Dublin City Development Plan 2016 - 2022* sets out the following requirements in relation to the extent and layout of public open space on Z15 zoned lands:

'A masterplan may assist in demonstrating how the requirements of this paragraph may be satisfied. The masterplan, which may necessitate a variation, shall set out a clear vision for the lands zoned Z15, to provide for the identification of 25% of the lands for open space and/or community facilities.'

The Masterplan must incorporate landscape features which retain the essential open character of the lands zoned Z15, setting out a clear vision for the lands which includes the provision of 25% of the lands for open space and/or community facilities. It must also ensure that the space will be provided in a manner designed to facilitate potential for future public use and protect existing sporting and recreational facilities which are available predominantly for community use. The 25% public open space shall not be split up, unless site characteristics dictate otherwise, and shall comprise mainly of soft landscaping suitable for recreational and amenity purposes and should contribute to, and create linkages with, the strategic green network'.

A Masterplan has been prepared for the site and has incorporated all the requirements of the Z15 zoning objective including public open space and potential future connections to adjacent wider lands.

At the outset, residential use is open for consideration at the subject lands and a crèche is permitted in principle. As demonstrated in Section 4.4 (Planning History) of the Planning Report, there are many examples of lands zoned Z15 which have been utilised for residential development which include a large quantum of public open space.

Section 14.8.14 of the *Development Plan* notes the following in relation to 'Open for Consideration' uses:

*'An **open for consideration use** is one which may be permitted where the planning authority is satisfied that the proposed development would be compatible with the overall policies and objectives for the zone, would not have undesirable effects on the permitted uses, and would otherwise be consistent with the proper planning and sustainable development of the area.'*

The proposed development will not have undesirable effects on the permitted uses or on the surrounding area, rather it will have a significant positive impact due to the sustainable utilisation of these lands that are currently completely closed off from the public, which proximate to public transport, employment locations, services and facilities. The site has always been in private use, and this will be replaced by a high-quality, aesthetically pleasing development providing 671 No. residential units, a large quantum of public open space and many permeable links through the site, which will be a significant planning gain for the area, and thus will be consistent with the proper planning and sustainable development of the area. This section demonstrates that the proposal is fully in accordance with the policies and objectives of the Z15 zoning pertaining to the site.

As set out above previously, the Jesuit Community have confirmed that the development lands which have been sold to the Applicant (which have always been in their private ownership and use), are surplus to their requirements due to a decline in vocations and are no longer required by the Jesuits for the purposes of its function and missions, and the lands and buildings have thus become impossible to maintain for the Jesuits. We reiterate that the Jesuits have retained the institutional lands to the south/south-west of the proposed development which addresses their future operational needs. A 2.4 metre high boundary wall is proposed to separate the proposed development from the remaining Jesuit lands. The proposed development can facilitate future potential connections to the remaining institutional lands through the wall should this be required.

The proposed 2.4 metre high boundary wall will be provided across the site from east to west between the lands that are being retained by the Jesuit Community (area to the south of the proposed wall), and the surplus lands that have been sold to the Applicant. As described in the Statutory Notices, a portion of the red brick link building will be demolished within the Applicant's lands, and once this portion of the 'link' building has been demolished and 'made good' and the new boundary wall is provided, this will facilitate a new permanent site boundary line which will delineate between the remaining Jesuit Community lands and the proposed new residential development on lands.

The proposed development requires 25% of the site area to be designated as public open space in accordance with the Z15 zoning objective. The developable site area is 42,547 sq m which therefore requires the provision of 10,637 sq m public open space:

The public open space is provided as follows:

- **Public Park and Plaza Area Connected Through the Triple Height Undercroft of Block A1:**

c. 10,970 sq m (c. 25.8% of the c. 42,547 sq m developable site area)
- **Northern Woodland Glade:**

c. 3,328 sq m (c. 7.8% of the c. 42,547 sq m developable site area)
- **Boulevard between Blocks A and B providing a pedestrian and cycle connection between Milltown Road and Sandford Road:**

c. 550 sq m (c. 1.2% of the c. 42,547 sq m developable site area)

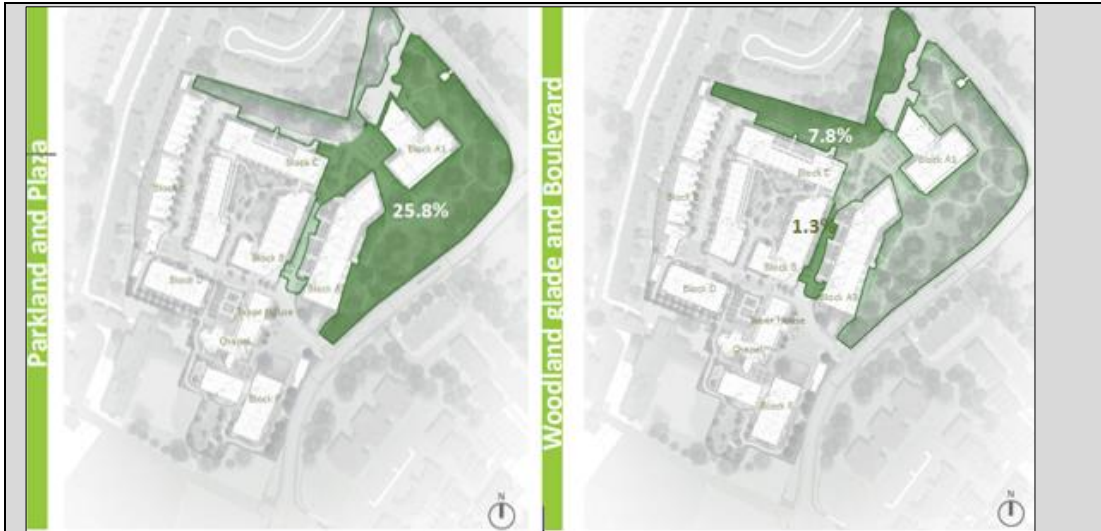


Figure 6.8: Public Open Space Provision at the Application Site

(Source: Cameo and Partners Design Studio, 2021)



Figure 6.9: Public Open Space Provision at the Subject Lands

(Source: Cameo and Partners Design Studio, 2021)

Therefore, a total of 14,848 sq m (c. 34.9% of the developable site area) has been designated as public open space which significantly exceeds the requirement to provide 25% public open space.

The majority of this space (25.8%) will be provided in the public park and the plaza area which are linked through the triple height undercroft of Block A1. This triple height linked archway through Block A1 will create a strong connection between the public park and the public plaza and thus it is clear that the required 25% public open space has not been split up as demonstrated in Figures 6.8/6.9. The plaza area will not allow vehicular access to ensure a safe and attractive space is provided for pedestrians.

We note that the large parkland along the eastern boundary of the site is currently significantly overgrown and inaccessible and this space will be transformed by the subject development and will become a significant public amenity for the area. The eastern boundary will now comprise a new public park which will open up the lands to the community for the first time as the lands have always been in private use. Natural play facilities for the scheme have been provided at various locations throughout the public open space, specifically aimed at children to reconnect with nature and there will also be opportunity for adult engagement through natural gym equipment. There will also be seating provided throughout the site.

The proposed development will remove all Category U¹⁵ trees for ecological purposes. To improve the quality and usability of the open space areas to the north and east of the site, the poor-quality Category C¹⁶ trees (91 No.) are recommended for removal and thus the proposed development will seek to open up this park for residents and visitors to enjoy. The transformation of this space into a public park will ensure that this large existing landscape feature has been retained in the masterplan which as discussed above, will be significantly improved and made usable.

We consider that the provision of a high-quality useable public park at the site with a connection to the public plaza area will be a significant planning gain for the area, allowing access to previously inaccessible private lands. The plaza area will provide a meeting point for the public to sit and talk.

The open space provided in the site will be high-quality and functional and will provide a wide variety of activities for the residents and public to utilise. High-quality and functional public open space will be provided, which includes publicly accessible walkways, grassland, benches, jogging route, fitness areas and play-on-the-way for example.

In addition to public park and plaza area connected through the triple height undercroft of Block A1, public open space will also be provided to the north of Block C (known as the Woodland Glade) which is positioned adjacent to the plaza. This Woodland Glade represents c. 7.8% of the site area (or c. 3,328 sq m) and will provide further amenity on site in excess of the 25% requirement. The Woodland Glade will include pathway, play spaces for children such as stepping stones and logs, outdoor fitness equipment and

¹⁵ Trees in such condition that any existing value would be lost within 10 years and which should, in the current context, be removed for reasons of sound arboricultural management. Trees that are dead, dying or showing immediate and irreversible decline. (CMK, 2021)

¹⁶ Trees of low quality and value (a minimum of 10 years). (CMK, 2021)

seating such as picnic table, which will contribute towards providing a high-quality environment for the public and future residents.

In addition to utilising the eastern public park/plaza/woodland glade, the public can also utilise the pedestrian connection from Milltown Road and Sandford Road through the pedestrian boulevard between Blocks A and B.

The entrance from Sandford Road will be a secondary vehicular entrance, principally for taxis, set down and deliveries with a small element of mobility impaired parking and there will be no vehicular access allowed to this plaza area which will ensure this area is a high-quality public space.

In the interests of robustness, as noted earlier in this section, we reiterate that when the application site is developed, the entirety of the Z15 lands will still provide more than 25% open space, with 58.7% open space provided across the entire extent of the Z15 lands. In addition, we reiterate that 39.5% of open space will be provided on the application site and the retained Jesuit Community lands (i.e. lands under the control of the Jesuit's who sold the site and the Applicant) after the proposed scheme has been implemented. We also reiterate that it is important to note that none of the Z15 lands were ever publicly available and were always in private ownership. The subject application serves to open up the lands within the Applicant's control for the first time as the public have never enjoyed any right of access to these privately owned lands, providing 34.9% of their site as open space that will be available to the community.

Furthermore, the *Development Plan* states:

*'It must also ensure that the space will be provided in a manner designed to **facilitate potential for future public use and protect existing sporting and recreational facilities which are available predominantly for community use**'.* [Our Emphasis]

As noted above, the subject application lands at Milltown Park have always been in private use and the public have never had right of access to the lands. Therefore, the provision of 14,848 sq m of public open space at the site will significantly increase the provision of public recreational facilities in the area, and thus rather than "retaining" sporting and recreational facilities at the subject site for public use (as there currently is none), the development will provide a large amenity for the public which has never been available at Milltown Park.

The public open space will be provided within soft and hard landscaping and will include play areas and outdoor gyms in addition to pathways for pedestrians and cyclists to utilise for example. The scheme layout will improve legibility in the area and the proposed development will integrate into the surrounding context having regard to the open spaces in addition to the permeable links, the height transitions, the setbacks provided from boundaries and the breakdown in massing provided. The rejuvenation of the Chapel and Tabor House within the development will also contribute towards the assimilation of the scheme into the surrounding environment and the improved character of these structures will benefit from enhanced views via the newly proposed entrance from Milltown Road.

Therefore, it is clear that the proposed development incorporating a detailed landscaping strategy has been '*designed to facilitate potential for future public use*' particularly having

regard to the attractive and high-quality public open space provided, where public access has never been previously available.

The *Development Plan* states:

'In considering whether there is no longer a need for the existing institutional use and a material contravention or variation to the development plan is proposed, the planning authority shall consult with the owner/operator of the existing institutional and community uses and the relevant statutory provider (e.g. the Department of Education and Skills in the case of schools, and the Department of Health and the HSE in the case of hospitals). A masterplan is required in these circumstances.'

As noted previously, the existing Institutional users, the Jesuit Community, no longer require the subject lands and have sold them to the Applicant. We reiterate that available land has been held by the Institutional landholders that may be developed in future if required (i.e. open spaces retained by the Jesuits and Gonzaga). Therefore, it is clear that the existing institutional use is being protected and provided for into the future by excluding a significant number of institutional buildings from the application site which meets the requirement of the Jesuit community. We would like to re-emphasise that the subject development provides significant quantum of public open space (c. 14,848 sq m) for the public to utilise, which represents a significant planning gain for the area as this space is currently non-existent for the public at this location at present.

The *Development Plan* also notes the following:

'With any development proposal on these lands, consideration should be given to their potential to contribute to the development of a strategic green network and to the delivery of housing in the city.'

The *Development Plan* notes the following objectives:

- *'Balancing the need of the city to consolidate with the need to protect and enhance vulnerable natural areas;*
- *Addressing deficits of publicly available green space;*
- *Protecting the existing green infrastructure network from fragmentation and creating sustainable connectivity between green areas; and*
- *Providing for the recreational and amenity needs of the population.'*

The proposed development complies with these objectives of the *Development Plan* as the development balances the need to densify this sustainable urban site in order to consolidate the city while also appropriate setting back the development from surrounding areas having regard to public open space and roads and in addition, the western boundary is made up of modest 3 No. storey buildings for example, which highlights that the proposed development has appropriately considered the transition between the development and surrounding spaces. The development will enhance the local area by providing permeable links and a large quantum of high-quality public open space for the locality, which provides for the recreational and amenity needs of the population.

The proposed development will significantly contribute to housing supply by converting previously inaccessible, private lands to publicly available housing units with large open

spaces, which is consistent with the Z15 zoning objective and will also contribute to the city's strategic green infrastructure networks by providing public routes through the site within the landscaping layout. The development will thus facilitate connections for the public through the site towards the Dodder Greenway route and other green infrastructure areas, which will positively contribute to, and create linkages with, the surrounding strategic green network. It is clear that the proposed development will significantly contribute to the green infrastructure of Dublin City.

To conclude this section, the proposed development which comprises 671 No. residential units with ancillary resident amenities and facilities in addition to a creche is consistent with the zoning objective pertaining to the lands.

Please see Section 2.1 and 2.2 of the Thornton O'Connor Town Planning Response to ABP Opinion document for full details in relation to the Z15 requirements in response to the An Bord Pleanála Opinion.

6.3.2 Architectural Conservation Area and Protected Structures

Policy CHC₄ of the *Development Plan* notes the following in relation to Architectural Conservation Areas (ACAs):

'To protect the special interest and character of all Dublin's Conservation Areas. Development within or affecting a conservation area must contribute positively to its character and distinctiveness, and take opportunities to protect and enhance the character and appearance of the area and its setting, wherever possible.

Enhancement opportunities may include:

1. *Replacement or improvement of any building, feature or element which detracts from the character of the area or its setting*
2. *Re-instatement of missing architectural detail or other important features*
3. *Improvement of open spaces and the wider public realm, and re-instatement of historic routes and characteristic plot patterns*
4. *Contemporary architecture of exceptional design quality, which is in harmony with the Conservation Area*
5. *The repair and retention of shop- and pub-fronts of architectural interest'.*

The *Development Plan* further states that:

'Development will not:

1. *Harm buildings, spaces, original street patterns or other features which contribute positively to the special interest of the Conservation Area*
2. *Involve the loss of traditional, historic or important building forms, features, and detailing including roof-scapes, shop-fronts, doors, windows and other decorative detail*

3. *Introduce design details and materials, such as uPVC, aluminium and inappropriately designed or dimensioned timber windows and doors*
4. *Harm the setting of a Conservation Area*
5. *Constitute a visually obtrusive or dominant form.'*

In addition, Policy CHC5 states the following:

'To protect Protected Structures and preserve the character and the setting of Architectural Conservation Areas'.

The subject site is not located within an Architectural Conservation Area (ACA), however the Belmont Avenue/Mount Eden Road Architectural Conservation Area is located to the north of the site.

The sensitive status of the ACA has been duly considered as part of the design process of the subject scheme having regard to the following:

- The natural set back provided between the site and the ACA due to the position of Sandford Road which runs between the northern boundary of the site and the southern boundary of the ACA;
- The position of built forms within the site which are set back from the northern boundary with Sandford Road; and
- The provision of public open space along this northern boundary naturally ensures that the building forms are set back from the ACA.

In addition, the proposed development has comprehensively considered the neighbouring Protected Structures in the vicinity along Sandford Road and Clonskeagh Road in the scheme layout. The large parkland provided with significant tree cover along the northern and eastern boundaries results in the building forms being set back from the boundaries which will ensure that the development is appropriately screened as viewed from the Protected Structures opposite on Sandford Road and opposite on Clonskeagh Road.

We note there are existing dwellings located in Norwood Park between Protected Structures to the north-west of the site and the subject development. Nonetheless, there is a large area of public open space provided along this northern boundary which will provide a natural setback between the subject development and the Protected Structures. Therefore, it is considered that the character of the Protected Structures will not be materially impacted by the proposed development.

The EIAR Architectural Heritage Chapter (Chapter 7) prepared by Molloy and Associates notes the following in this regard:

'Accordingly, considerable effort has been made to retain the sylvan character of the boundary separating the development site from protected structures on Sandford Road

and Clonskeagh Road, which, whilst outside the ACA, frame the character of Belmont Avenue.

Notwithstanding measures taken to mitigate impacts, the proposed scheme will alter the current character of lands and consequentially, views from the surrounding areas.

The view of the Sandford Road entrance and the mature tree canopy that extend above it is prominent at the south end of Belmont Avenue. The vegetative buffer along the northern and eastern site boundary obscures present vistas of the extant building complex. The outward character of Milltown Park is defined by this enclosing boundary wall and mature tree planting which will remain unchanged by the proposed development.

Although the parkland was not purposefully designed as an integral part of the early suburban streetscape, the mature planting now contributes to its leafy character and effectively screens outward views from within the ACA. Whilst larger in scale than surrounding residences, which are predominantly 2-3 storeys in height, the considered positioning of the new residential development at a respectful distance from the perimeter of the site, inside the established tree boundary, effectively screens the new structures and inherently reduces the potential for visual impact.

The landscaping design concentrates on protecting and supplementing the existing vegetative buffers between the protected structures to the north-east and the subject lands. Open spaces have been designed to protect and meaningfully incorporate specimen trees at perimeters.

The proposed development is designed within a parkland setting, exploiting previously private lands that were inaccessible to the public since the site's evolution in the 18th century.

The Belmont Avenue/Mount Eden Road ACA does not have access to a public park.

Its architectural character, being defined by dense terraces could benefit from open space such as that provided by the subject development, providing 30% open space. Increased footfall through the site from established residential communities from the west and vice versa, will, albeit indirectly, enhance the connectivity of the ACA to linear parks to the west, generating a positive amenity for the quality of the historic urban environment.

Visual connections through the depth of the parkland amenity, previously denied by the hostility of the boundary wall to the east of the site, will be established with the ACA'.

6.3.3 Plot Ratio

The *Development Plan* sets out that:

'Plot Ratio is a tool to help control the bulk and mass of buildings. It expresses the amount of floorspace in relation (proportionally) to the site area and is determined by the gross floor area of the building(s) divided by the site area.'

The indicative plot ratio for lands zoned Z15 outlined in the *Development Plan* is 0.5-2.0. The proposed development of this Planning Application has a plot ratio of 1.29 which is within

the plot ratio limitations prescribed by the *Development Plan* demonstrating the appropriateness of the overall development and the extent of the open space provided on the site.

6.3.4 Site Coverage

The *Dublin City Development Plan 2016 -2022* stipulates:

'Site coverage is a control for the purpose of preventing the adverse effects of overdevelopment, thereby safeguarding sunlight and daylight within or adjoining a proposed layout of buildings. Site coverage is the percentage of the site covered by building structures, excluding the public roads and footpaths.'

The indicative site coverage for lands zoned Z15 outlined in the *Development Plan* is 50%.

The proposed development of this Planning Application has a site coverage of 23.4% which is significantly lower than the indicative standard provided in the Plan. This further demonstrates the concerted efforts made by the Design Team to ensure that the development maximises opportunities to provide substantial tracts of open space and generous separation distances from proximate developments.

6.3.5 Building Height

We note however that the adopted *Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)* ("*Building Height Guidelines*") post-dates the Development Plan, and the Development Plan must be read in light of the changes to building height requirements introduced by the Guidelines. Therefore, the height proposed in the subject scheme has taken the opportunity to explore the potential for increased height. The height of the subject scheme is modulated throughout the site, principally ranging from 8.948 metres – 31.6 metres (plus lift overruns).

It is our professional planning opinion that this large site has the capacity to absorb increased height as the site has significant frontage onto Milltown Road and Sandford Road and the site is positioned on a main arterial route into the city centre.

The highest elements of the scheme are located at the least sensitive locations away from neighbouring residential properties and the lower elements positioned adjacent to these properties. It is considered that appropriate heights have been provided responding to the recently adopted Building Height Guidelines as illustrated on the accompanying Architectural Drawings prepared by OMP Architects.

We note that a Material Contravention Statement has been prepared by Thornton O'Connor Town Planning, which provides a comprehensive justification for increased height at this location, having regard to the high quality architectural composition of the scheme and the site's receiving context.

6.3.6 Urban Design

Policy SN1 of the *Dublin City Development Plan 2016 – 2022* sets out the following policy:

'To promote good urban neighbourhoods throughout the city which are well designed, safe and suitable for a variety of age groups and tenures, which are robust, adaptable, well served by local facilities and public transport, and which contribute to the structure and identity of the city, consistent with standards set out in this plan.'

Policy SN2 notes the following:

'To promote neighbourhood developments which build on local character as expressed in historic activities, buildings, materials, housing types or local landscape in order to harmonise with and further develop the unique character of these places.'

The proposed dwelling mix of 99 No. studios, 271 No. 1 beds, 274 No. 2 beds and 27 No. 3 beds (including both the Build-to-Sell units and Build-to-Rent units) ensures that a variety of age groups and tenure are catered for in this area (such as younger generation looking for flexibility, young couples seeking to purchase their first home and for older person to trade-down to a smaller home for example). The proposed development will promote permeability through the site from Sandford Road to Milltown Road through the public park and a pedestrian boulevard from Sandford Road through the plaza area which connects to the forecourt of Tabor House and the Chapel (with access to Milltown Road also possible at this location). The public park will be suitable for all age groups and tenures and will contain gathering tables, seating areas, informal planting, play on-the-way and fitness furniture for example.

As noted throughout this Report, the site is well served by public transport and is within walking and cycling distance of services and facilities in addition to employment locations.

The scheme has retained the existing Tabor House and the Chapel within the proposed development which will ensure that the local history of the Jesuit Community use is retained at the subject lands. The entrance from Milltown Road will provide direct views of Tabor House and the Chapel ensuring that they will be a focus of the development.

The site's large frontage onto Milltown Road and Sandford Road provides a rare opportunity to open the site up to the surrounding area and the provision of significant quantum of open spaces and permeable links in the scheme is therefore considered a unique planning gain for the area. It is noted that these lands were always in private use and the buildings and the lands subject to development were never publicly accessible lands.

6.3.7 Variation of Accommodation Types

The Development supports a mix of housing and apartment types that will contribute to the surrounding neighbourhood:

Policy SC14:

'To promote a variety of housing and apartment types which will create a distinct sense of place in particular areas and neighbourhoods, including coherent streets and open spaces.'

As such, the provision of the Build-to-Rent apartments providing 604 No. units comprising 89 No. studios, 262 No. 1 bed units, 242 No. 2 bed units and 12 No. 3 bed units and 67 No. Build-Sell duplex units and apartments (11 No. studios, 9 No. one bed units, 32 No. two bed units and 15 No. three bed units) provides an alternative accommodation scale and typology in the City and meets the changing nature of household needs.

6.4 Minimum Residential Development Standards

The subject development has been designed to accord with residential development standards as prescribed in the *Development Plan* and the *Apartment Guidelines, 2020*.

O' Mahony Pike Architects have prepared a Housing Quality Assessment Table (HQAT) which is enclosed as a separate document with this planning application. This table provides a detailed breakdown of the quantitative standards affecting the development and includes an assessment of the size of the units, aggregate floor areas of living and bedroom spaces, storage areas and open space for examples.

As demonstrated in the HQAT prepared by O' Mahony Pike Architects, the proposed development meets the standards in the majority of cases and exceeds the standards in some cases, except for 14 No. studio units within the existing Tabor House. As this is an existing historical building, we consider the provision of some studios ranging in size from 33.5 sq m to 35 sq m in this instance to be acceptable. This flexibility in relation to historic buildings is allowed under Section 6.9 and 2.2 of the *Apartment Guidelines, 2020* and under Section 16.10 of the *Development Plan*, which is fully detailed in the enclosed Material Contravention Statement.

Therefore, the subject development is acceptable in relation to the standards outlined in the *Dublin City Development Plan 2016-2022* and the *Apartment Guidelines, 2020*.

6.5 Public Open Space

In relation to the provision of public open space, the development plan requires 25% of the site area due to the Z15 zoning objective (as opposed to the 10% normally required for residential developments), thus 10,637 sq m of open space is required. The proposed development includes 14,848 sq m of public open space (34.9% of the wider site area) which significantly exceeds the standards prescribed by the Z15 zoning. We further note that the majority of this space (25.8%) will be provided in the public park and the plaza area which are linked through the undercroft of Block A1. This linked triple height archway through Block A1 will create a strong connection between the public park and the public plaza. We reiterate that the plaza area will not allow vehicular access to ensure a safe and attractive space is provided for pedestrians. Please see further details in Section 7.3 above regarding the extent and layout of the public open space.

6.6 Communal Open Space

The *Development Plan* states the following in relation to communal open space:

'In schemes of 25 or more units small play spaces of 85-100 sq m are considered suitable for toddlers and children up to the age of six, with suitable play equipment, seating for parents/ guardians, and within sight of the apartment building. For larger schemes of 100 or more apartments, play areas of 200-400 sq. m for older children and young teenagers should be provided.'

The *Apartment Guidelines, 2020* provides an updated version of this policy as follows:

'The recreational needs of children must be considered as part of communal amenity space within apartment schemes. Experience in Ireland and elsewhere has shown that children will play everywhere.

Therefore, as far as possible, their safety needs to be taken into consideration and protected throughout the entire site, particularly in terms of safe access to larger communal play spaces. Children's play needs around the apartment building should be catered for:

- within the private open space associated with individual apartments (see chapter 3);
- *within small play spaces (about 85 – 100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and*
- *within play areas (200–400 sq. metres) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms.*

The perimeter block with a central communal open space is particularly appropriate for children's play, especially if access from the street is controlled. The landscape design and orientation of play areas can contribute significantly to their amenity value. However, the noise from courtyard play areas can diminish residential amenity, particularly in smaller schemes, and designers must find solutions which balance all the factors involved.' [Our Emphasis]

We note that a large c. 400 sq m play area has been provided to the north east of the public park, adjacent to the new pedestrian gate. In addition, the development has been provided with smaller equipped play spaces for toddlers, and for older children/teenagers, which are dispersed throughout the development, such as within the public parkland, courtyard between Blocks B and C and adjacent to Block F. Therefore, it is clear that a wide range of play areas have been provided within the proposed development, which are located proximate to buildings and seating is provided throughout.

The *Development Plan* further notes that proposals should demonstrate the following:

- complies with the minimum standards set out below ✓
- will be soft and/or hard landscaped with appropriate plant species and landscaping materials such as those with good resistance to accidental damage and low maintenance characteristics ✓

- is secure for residents and benefits from passive surveillance considers the needs of children in particular in terms of safety and supervision✓
- is wheelchair accessible✓
- achieves good sunlight penetration✓
- has appropriate arrangements for maintenance and management such as a conveniently accessed garden maintenance and storage area with water and drainage connections.✓

The *Development Plan* and (*Apartment Guidelines, 2020*) further set out the following standards:

Minimum Floor Areas for Communal Open Space	
Studio	4 sq m
One Bedroom	5 sq m
Two Bedroom (3 No. persons)	6 sq m
Two Bedroom (4 No. persons)	7 sq m
Three Bedroom	9 sq m

The development comprises 99 No. studios, 271 No. 1 beds, 274 No. 2 beds and 27 No. 3 beds 99 No. studios, 271 No. 1 beds, 274 No. 2 beds (31 No. 3-person and 243 No. 4-person) and 27 No. 3 beds which results in a total requirement for 3,881 sq m to accord with the minimum areas for communal amenity space. The development proposes to provide 5,444 sq m of communal open space, which represents 12.8% of the site area, 431 sq m of communal space in upper level terraces of Blocks A1, B and C and in addition to the outdoor space provided, the development will also provide dedicated internal communal space of 1,248.8 sq m including co-working space, library/reading rooms, lounges and a multi-purpose room ensuring that high quality internal and external communal amenity space is provided for future tenants. Thus, the proposed communal open space significantly exceeds the minimum communal amenity space standards.

Therefore, the proposed development provides a total of 7,123.8 sq m of internal and external communal space which is an average of 10.62 sq m per unit.

6.7 Private Open Space

The *Development Plan* sets out that:

'Private open space shall be provided in the form of gardens or patios/ terraces for ground floor apartments and balconies at upper levels. Where provided at ground floor level, private amenity space shall incorporate boundary treatments appropriate to ensure privacy and security.'

The minimum requirements for private open space are provided below:

Minimum Area for Private Open Space	
Studio	4 sq m

1 No. bedroom unit	5 sq m
2 No. bedroom unit	7 sq m
3 No. bedroom unit	9 sq m

The Housing Quality Assessment prepared by OMP Architects demonstrates that all Build-to-Sell units and the majority of the Build-to-Rent apartments benefit from private balconies, with the exception of the 79 No. studio and 1 bed units proposed (including 10 No. studios and 8 No. 1 beds in the existing Tabor House proposed to be refurbished). Each new build studio unit will be provided with a Juliet balcony and it is considered appropriate to avoid providing any balconies in Tabor House to ensure that the character of the existing historic building is retained.

We note that a significant quantum of communal and public open space has been provided which will cater for the units that have been not provided with a balcony and as permitted in the *Apartment Guidelines, 2020* (adequate compensatory communal support facilities and amenities are provided). Please see Section 3.7 of the Material Contravention Statement enclosed. Flexibility is also allowed in relation to existing historic buildings as per Section 6.9 of the *Apartment Guidelines, 2020*.

6.8 Dual Aspect

The *Development Plan* stipulates that:

'Dual aspect apartments maximise the available of sunlight and should be provided where possible. It is a specific planning policy requirement in the 2015 Department Guidelines that the minimum number of dual aspect apartments that may be provided in any single apartment scheme shall be 50%. In certain circumstances, usually on inner urban sites, this may be further reduced to an absolute minimum of 33% where it is necessary to ensure good street frontage and subject to high quality design.'

Since the adoption of the *Development Plan*, updated National Planning Policy has been adopted as such as the *Apartment Guidelines, 2020*. In respect of dual aspect, SPPR₄ of the *Apartment Guidelines, 2020* states:

'In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

(i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.

(ii) In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.

(iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha , planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.'

Although it has been determined that the subject site is a central and/or accessible urban location (with a target of 33% dual aspect), the proposed development has included 51% dual aspect units which exceeds the minimum requirement for suburban or intermediate locations. In this regard, a high-quality design is proposed that ensures the protection of surrounding residential amenity through appropriate set-backs with excellent frontage provided onto Milltown Road and Sandford Road.

6.9 Car Parking

The subject site lies within Area No. 2 for car parking where the applicable standard as per Table 16.1 of the *Development Plan* is a maximum of 1 No. car parking space per dwelling and 1 No. space per class (with respect to the creche).

As the subject lands are located in a 'Central and/or Accessible Urban Location' proximate to public transport services, employment locations, services and facilities, the proposed development has been provided with a parking ratio of 0.50 spaces per residential unit (i.e. 335 No. spaces for the 671 No. units – excluding creche parking/drop off/taxi). Some 3 No. spaces have been provided for the creche which will be provided with 5 No. classrooms.

We also note that 10 No. car share spaces are proposed (5 No. GoCar and 5 No. development car share) and in addition the total car parking includes 18 No. mobility impaired spaces, 35 No. EV parking spaces, 2 No. taxi spaces, 4 No. set-down/drop-off spaces and 3 No. spaces for the creche.

The following table sets out the breakdown of the parking spaces proposed:

Use Type	Basement	Surface
Apartments	290 (including 14 mobility impaired and 35 EV parking)	35 No. (including 4 No. mobility impaired)
Car Share	5 No. Development Car Share	5 No. (all GoCar)
Collection/Drop-Off/Set-Down	-	4
Taxi	-	2
Crèche	-	3
Total	295	49

Please refer to the enclosed Traffic and Transport Report, Parking Strategy and Mobility Management Plan prepared by DBFL Consulting Engineers for further details.

We note a recent grant of permission issued by An Bord Pleanála on 31st August 2020 in relation to a proximate development at Nos. 1, 3, 5, 7, 9 and 11, Eglinton Road, Donnybrook, Dublin 4 (ABP Reg. Ref. PL29S.307267).



Figure 6.10: Location of DCC Reg. Ref. 3047/18 [ABP Reg. Ref. PL29S.307267] (Orange Star) in Proximity to the Subject Lands at Sandford Road (Red Star)

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2021)

This development also proposed a parking ratio of 0.50 No. spaces per unit (for 148 No. units) and the An Bord Pleanála Inspector noted the following in their assessment:

'The quantum of parking proposed follows the approach in the Apartment Guidelines, minimising the level of car parking in central and/or accessible locations, such as where the application site is located. This is in recognition of the excellent accessibility that future residents will have to high frequency bus links and the good access to other forms of public transport, including DART services via a short walk to Sandymount Station and Luas services that are located a short cycle ride away. The submitted report describes how surrounding car ownership levels (using census data) has influenced the car parking level included in the development and a submitted Mobility Management Plan further supports this. Surrounding the site, parking in streets is controlled by double yellow lines and pay and display schemes.

As a result of the above, and in consideration of the cycle storage level and car club spaces included in the development, I consider the proposed car parking level to be acceptable. [Our Emphasis]

Having regard to the site's sustainable location in close proximity to excellent modes of public transport which will generate less parking demand than a standard residential development and having regard to this recent decision on Eglinton Road, it is considered that this level of reduced parking is appropriate for the scheme, having regard to the *Apartment Guidelines, 2020*.

6.10 Bicycle Parking

The subject scheme will provide for a significant quantity of bicycle parking spaces to accommodate a sustainable modal shift away from car dependency. The Dublin City Council Development Plan requirement for bicycle parking is 699 No. (residential and creche) and

the requirement of the *Apartment Guidelines, 2020* is 1,335 No. (plus 26 No. required for the crèche).

Land Use	No Units / (Beds) / Creche	DCC Requirement	Apartment Guidelines Requirement	
		Long Stay	Long Stay	Short Stay
Apartments	671 No. units (999 No. beds)	1 space per unit = 671 No. spaces	1 space per bedroom = 999 No. spaces	1 space per 2 units = 336 No. spaces
Creche	80 children	1 per 3 children = 26 No. spaces	N/A	N/A
Total Requirement		698 No. spaces	999 No.	336 No.
			1,335 No. total plus 26 No. for creche= 1,361 No. spaces	
Total Provided	1,361 No. spaces including 5 No. cargo spaces at basement and 4 No. cargo spaces at surface			

There is a requirement to provide 698 No. bicycle parking spaces in accordance with the Development Plan standards and a requirement to provide 1,335 No. bicycle spaces in accordance with the *Apartment Guidelines, 2020*, in addition to 26 No. for the creche (total required = 1,361 No).

The proposed development provides a total of 1,361 No. bicycle parking spaces (including 9 No. cargo bicycle spaces-5 No. at basement and 4 No. at surface) which exceeds the *Apartment Guidelines, 2020* requirement and significantly exceeds the *Development Plan* requirement.

Some 14 No. motorcycle space have been provided in the basement to serve the proposed development.

Please see the Parking Management Strategy prepared by DBFL Consulting Engineers enclosed separately for further details in relation to this Item.

6.11 Summary

The proposed development to provide a residential development comprising 604 No. Build-to-Rent units and 67 No. Build-to-Sell units with ancillary facilities and amenities, a creche, and public and communal open spaces fully accord with National, Regional and Local planning policies and objectives.

It is considered that the design response provides a contemporary architectural solution that maximises the development potential of the subject lands in the interests of sustainable development and having regard to the location of the lands in close proximity to high-frequency public transport employment locations, services and facilities. The design has sought to respond to the locational characteristics of the site proximate to low density houses yet provide a development that also responds to the site characteristics and



opportunities presented by a very large corner underutilised plot that is positioned on a key arterial route in Dublin.



7.0 CONCLUSION

We submit that the subject site is ideally suited to the provision of a residential development comprising a mix of Build-to-Sell and Built-to-Rent units with ancillary residential facilities and amenities and a creche, due to its sustainable location in Dublin in proximity to employment locations, public transport, services and facilities.

The principal goal of the subject development, which seeks to provide 671 No. units on this key underutilised site in Dublin 6 is to open up the site to the wider community through the provision of an extensive range of public open spaces and to increase housing supply on a strategically located large plot of underutilised land and provide choice of tenure in the area having regard to the mix of units proposed.

The development has been designed to accord with National and Local Level Planning Policy and will provide a high-quality living environment that provides opportunities for social interaction and integration. As such, it is considered that the proposed development represents the proper planning and sustainable development of the area.

Yours sincerely

Patricia Thornton

Patricia Thornton
Director
Thornton O'Connor Town Planning

Appendix A – Letter from Thomas Casey SJ (Rector) from the Jesuit Community confirming that the former Community property is no longer required by the Society

Steve Cassidy
 Managing Director
 Ardstone Homes
 48 Fitzwilliam Square
 Dublin 2
 D02 EF89

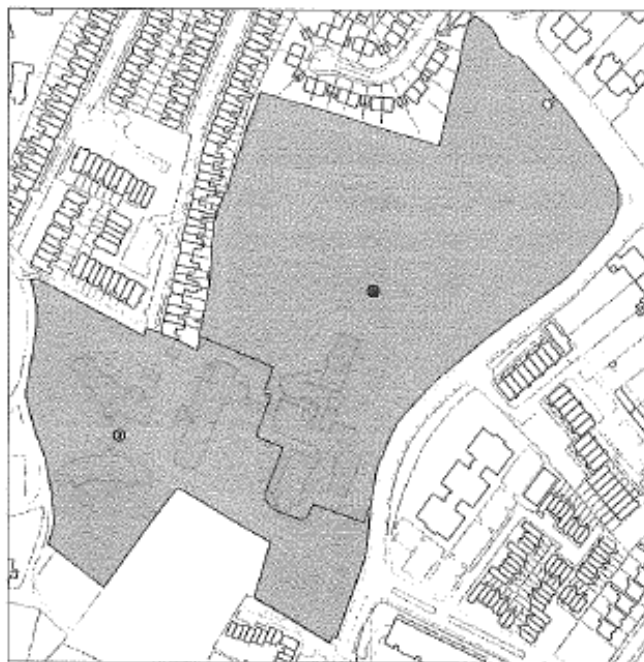
12th August 2021

Re: Former Jesuit Property at Sandford Road, Milltown Park, Dublin 6

Dear Mr. Cassidy,

I can confirm that the former Jesuit Community property at Sandford Road, which has now been purchased by Ardstone Homes ("Sandford Living Limited"), and which is the area numbered 1 on the map below, ("the subject property") is no longer required by the Society for the purposes of its functions and mission.

The subject property which formed part of the Jesuit Milltown Park campus includes the original period buildings and adjoining lands. The Society is retaining its modern residential and administration accommodation to the south of the application lands with separate access from Milltown Road and which are numbered 2.



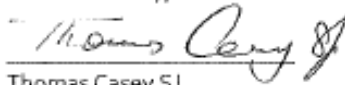
The Jesuits originally purchased the entire Milltown Park campus in the 1850's and subsequently adapted and extended the original period residence to provide a novitiate followed by Schools of Philosophy and Theology and later a community chapel, theatre and library. For more than 160 years the role of the Milltown Park community has been the formation of Jesuits, and, since the 1960s, a dozen other religious congregations in Theological and Pastoral Ministry. Since the 1960s these studies were expanded to include the education of lay people as part of a move towards greater lay involvement in Church Ministry. Both these areas have experienced a dramatic decline and falling vocations leading the Society to close these facilities and seek other options for training of priests. In tandem with other Religious Orders across Ireland, the Jesuit Community has experienced a significant decline in vocations which is impacting on the scale of accommodation required. Over the

last number of years, the Community has been considering how best to maximise the use of its property, staff and resources for the future at Milltown Park.

With the departure of the clerical students, the older Milltown buildings and adjoining land became surplus to requirements and impossible to maintain by the Community and these buildings are now vacant and not in use. In the meantime, the Jesuits developed modern residential and administration accommodation to the rear including Milltown Park community house and Cherryfield Lodge nursing home, which are being retained by the Jesuit Community, thus leaving the subject property redundant and leading to its sale. Prior to disposing of the subject property, we considered our future requirements thoroughly and we can confirm that the lands that we have retained are entirely adequate for our future needs.

I can also confirm that throughout the Society's ownership of the Milltown Park Campus, the subject property and the retained property were not available for public use and that access to the site was strictly managed and controlled by restricted opening of the gates at Sandford Road and Milltown Road.

Yours sincerely,



Thomas Casey SJ
Rector, Jesuit Community Milltown Park,
Milltown Road, Dublin 6

