



THORNTON O'CONNOR
TOWN PLANNING

Response to ABP Opinion

Planning Application

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 Pre-Application Consultation

On 19th August 2020, Thornton O'Connor Town Planning on behalf of Sandford Living Limited submitted a pre-application consultation request to An Bord Pleanála. The purpose of this document is to respond to the specific information requested by An Bord Pleanála in their Notice of Pre-Application Consultation Opinion, dated 6th November 2020 further to a meeting held on 23rd October 2020 with An Bord Pleanála, Dublin City Council and the Applicant/Design Team.

This Notice states that it is the Board's determination that the documents submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development.

In addition, An Bord Pleanála have requested that specific information should be submitted with any application for permission (response outlined in Section 2.0) and that 7 No. Statutory Consultees should be notified in the event of making an application (outlined in Section 3.0). To ensure that a robust proposal is submitted we have also provided a response to items raised in the An Bord Pleanála Inspector's Report which did not form part of the official An Bord Pleanála Opinion.

1.2 Key Changes Subsequent to the Section 5 Pre-Application Meeting with An Bord Pleanála and Dublin City Council

The following key design changes have been incorporated since the pre-application meeting with An Bord Pleanála:

- The total number of units proposed has reduced from 714 No. units to 671 No. units;
- A reduction in maximum principal height of Block A1 from 13 No. storeys to 10 No. storeys;
- Block A1 has been setback an additional c. 4 No. metres from the northern boundary with Sandford Road, which has significantly improved the public open space in this area;
- The updated site layout confirms that the Sandford Road access will be a secondary access only and the Milltown Road access will be the principal vehicular access to the site. In order to improve the quality of the public open space at the plaza, parking spaces have been removed from this area and bollards are proposed to the north of the plaza proximate to the Sandford Road entrance to prevent vehicular access to the plaza; and
- A creche (400 sq m) has been added to the ground floor of Block F.

2.0 RESPONSE TO SPECIFIC INFORMATION REQUIRED

This section will provide a response to the specific information requested by the Board in their Opinion, which states the following:

Furthermore, pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

2.1 Item No. 1 – Z15 Land Use Zoning

An Bord Pleanála stated the following:

'Further elaboration, including a map to an appropriate scale, of land uses across the entire Z15 land use zoning at Milltown Park.'

2.1.1 Applicant's Response

In response to this item, we have firstly provided the zoning map in Figure 2.1 to clearly demonstrate the entire Z15 zoning at the subject lands 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.

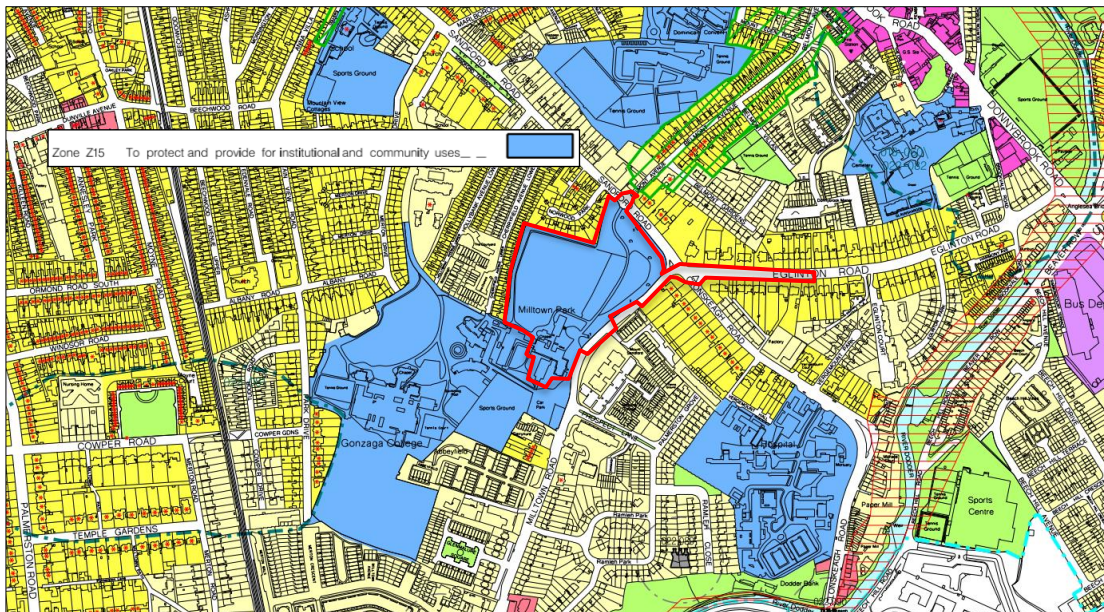


Figure 2.1: Extract from Map H Demonstrating the Z15 Zoning of the Subject Site (Indicatively Outlined in Red) and the Wider Z15 Lands at the Subject Location

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

Please see the image below in Figure 2.2 prepared from O’ Mahony Pike Architects, which highlights the land uses across the wider Z15 land use zoning at the subject location. A scaled OS Map illustrating the different uses across the site has been printed to scale by O’ Mahony Pike Architects and is also included in Appendix B to this report.



Figure 2.2: 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 (see letter enclosed as Appendix A). 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.

2.2 Item No. 2 – Extent and Layout of Public Open Space

An Bord Pleanála stated the following:

'Further elaboration of how the proposed extent and layout of public open space meets the specific requirements of the Z15 land use zoning objective. This shall consider the treatment of the proposed Public Plaza and access road from Sandford Road as public open space, as well as measures to improve public access to, and interaction with, the proposed public open space.'

2.2.1 Applicant's Response

In response to this item, we would firstly like to highlight the revised treatment of the proposed public plaza and Sandford Road access, which will ensure that the public plaza will be high-quality public open space that is connected with the large public park to the east of the subject site. This is detailed in Section 2.2.1.1. below.

The response to this item will follow with further elaboration of the proposed extent and layout of public open space on site to demonstrate that the specific requirements of the Z15 land use zoning objective have been met (such as the 25% public open space requirement and the facilitation of public use on a site that has historically been closed up (and is currently closed up) to the public) as fully detailed in Section 2.2.1.2 below.

2.2.1.1 Revised Treatment of Public Plaza and Sandford Road Access

In response to Item No. 2, the layout of the public plaza has been revised and vehicular parking spaces have been completely removed from this area. We note that bollards will prevent vehicles from accessing the plaza area, which will ensure that this plaza space is a safe and enjoyable environment for the public and residents.

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 thus will have very minimal traffic movements. The access also facilitates pedestrians and cyclists. The treatment of the public plaza and the Sandford Road access has thus been revised since the pre-planning tri-partite meeting and we consider that the removal of vehicles from the plaza has significantly improved this space and is now focused on pedestrians and cyclists and will be an attractive space for the public and residents to utilise, acting as a key link between the proposed public park and the proposed pedestrian and cycle routes from Milltown Road/Sandford Road along the pedestrian boulevard between Blocks A and B.

As noted above, the Sandford Road access will be a secondary access to the site and the new Milltown Road access will be the principal vehicular access to the site. In summary, this access from Milltown Road 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 Consulting Engineers have noted in the Traffic and Transport Assessment enclosed separately that 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 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.

It is our professional planning opinion that the revised treatment of the public plaza and the Sandford Road access appropriately responds to Item No.2 of the An Bord Pleanála Opinion. Please see Figures 2.3 and 2.4 below for a comparison between the treatment of the public plaza and the Sandford Road entrance at pre-planning tri-partite stage and the significantly improved revised treatment now submitted.



Figure 2.3: Extract of Illustrative Landscape Masterplan Submitted at Pre-Planning Tri-Partite Stage Showing Car Parking Spaces in the Plaza (Red Dashed Lines)

(Source: Cameo and Partners Design Studio, 2020)

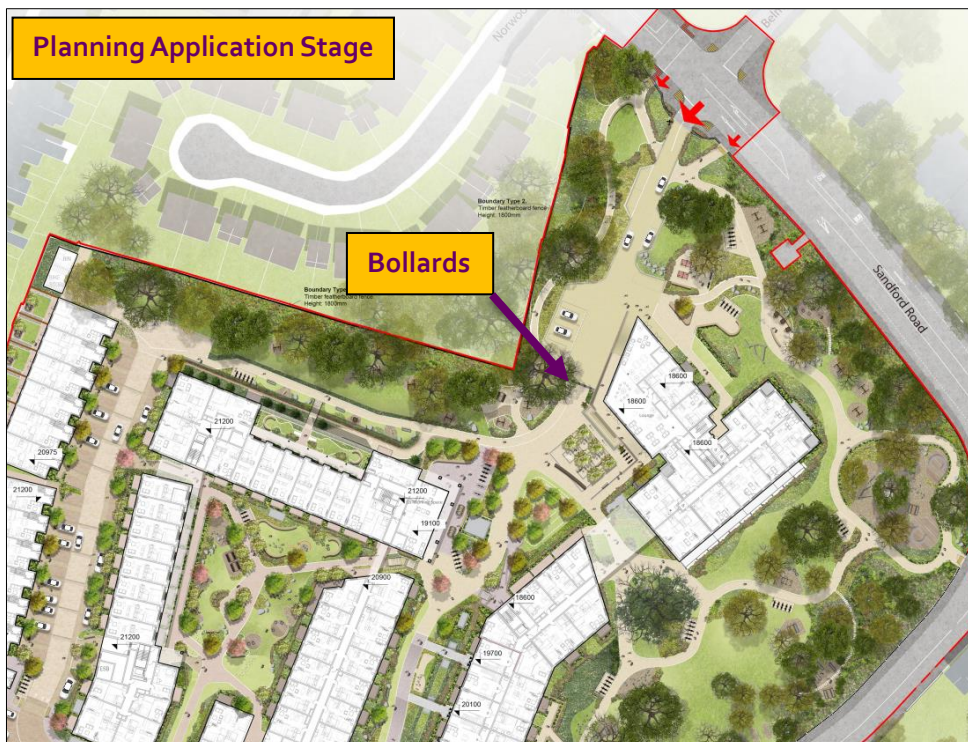


Figure 2.4: Extract of Illustrative Landscape Masterplan Submitted as Part of this Planning Application

(Source: Cameo and Partners Design Studio, 2021)



Figure 2.5: Illustrations of the Revised Public Plaza

(Source: Cameo and Partners Design Studio, 2021)



Figure 2.6: Illustration Demonstrating the Proposed Bollards Preventing Access to the Plaza Area

(Source: Cameo and Partners Design Studio, 2021)

2.2.1.2 Extent and Layout of Proposed Public Open Space

This section of the response to Item No. 2 will provide further elaboration on the proposed extent and layout of the public open space on site to demonstrate that the specific requirements of the Z15 land use zoning objective have been met. This section will firstly detail the background planning policy of the Development Plan relating to Z15 zoned lands and secondly, the details of the extent and layout of the public open space will be provided.

We note that 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.

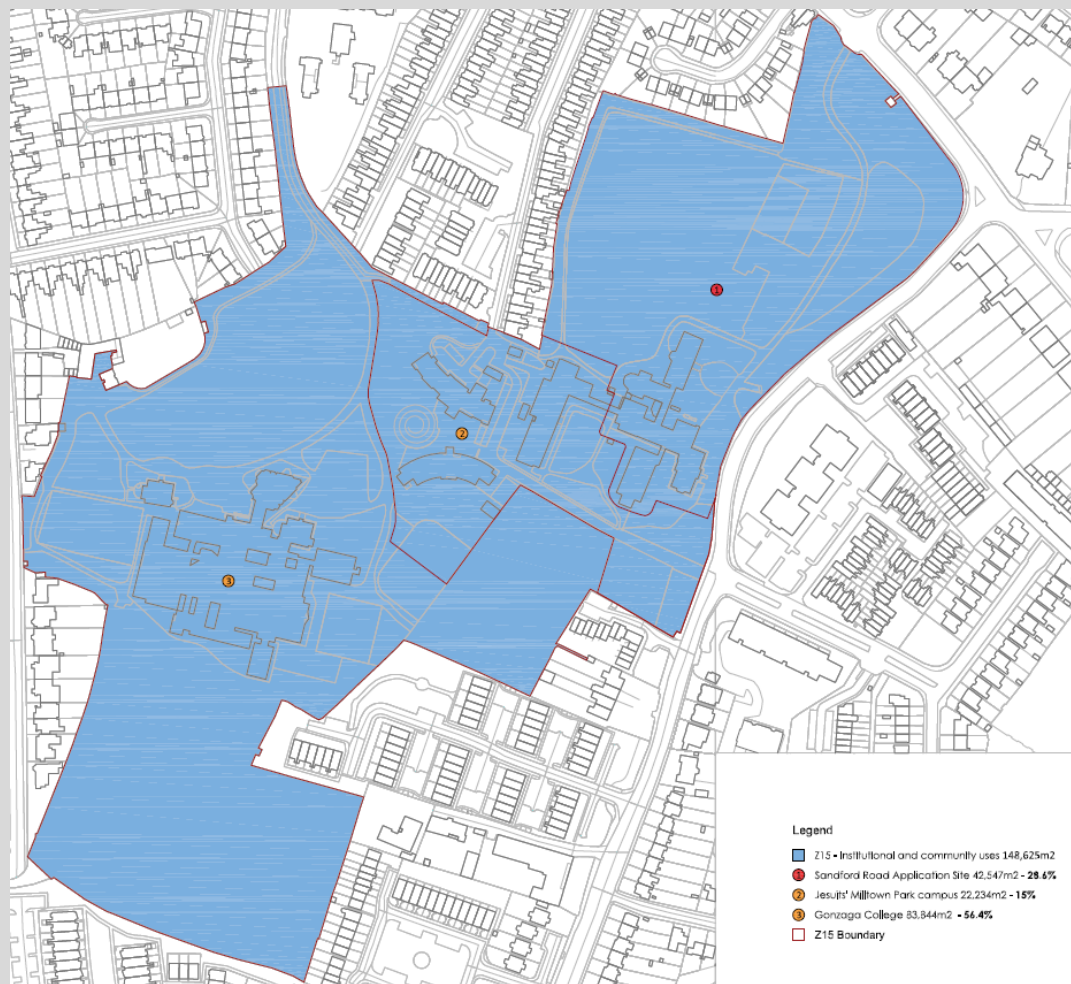


Figure 2.7: Image Demonstrating the Land Uses of the Entire Z15 Land Zoning at the Subject Location

(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 2.7. 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 2.8 demonstrates the existing open space at the subject Z15 lands. Figure 2.9 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 community¹ (details on extent and layout of public open space provided in this section below).

¹ Please note that any reference to open space in this section excludes the provision of communal open space on the application lands.

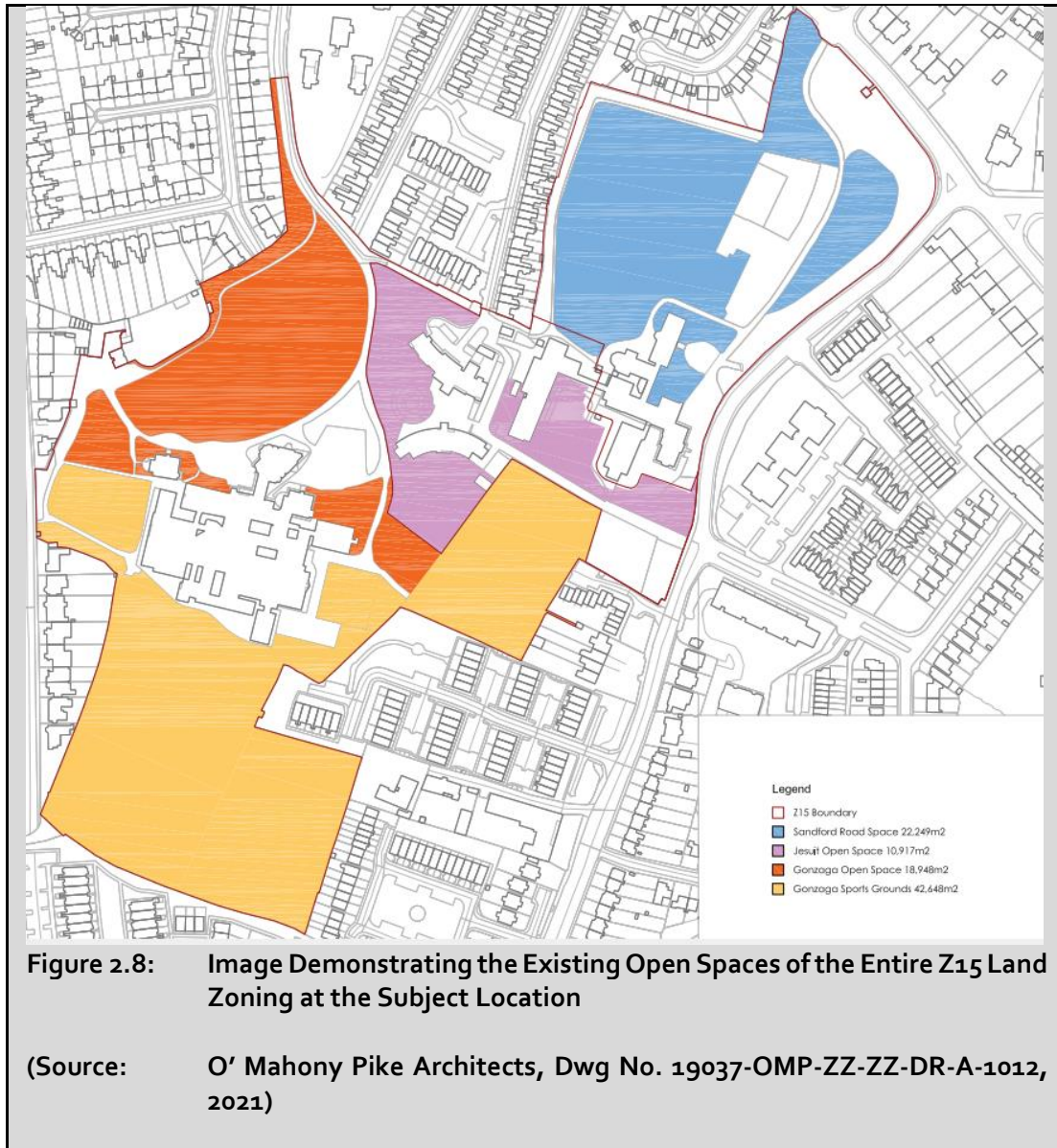




Figure 2.9: OS Map Demonstrating in Excess of 25% Open Space (58.7%) Will Still be Provided Across the Wider Z15 Lands with the Development in Place

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

(Source: 3D Design Bureau, 2021)



Figure 2.11: Illustration of Part of the Public Open Space Showing Seating Areas, Cyclists and Kids Playing

(Source: Cameo and Partners Design Studio, 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:

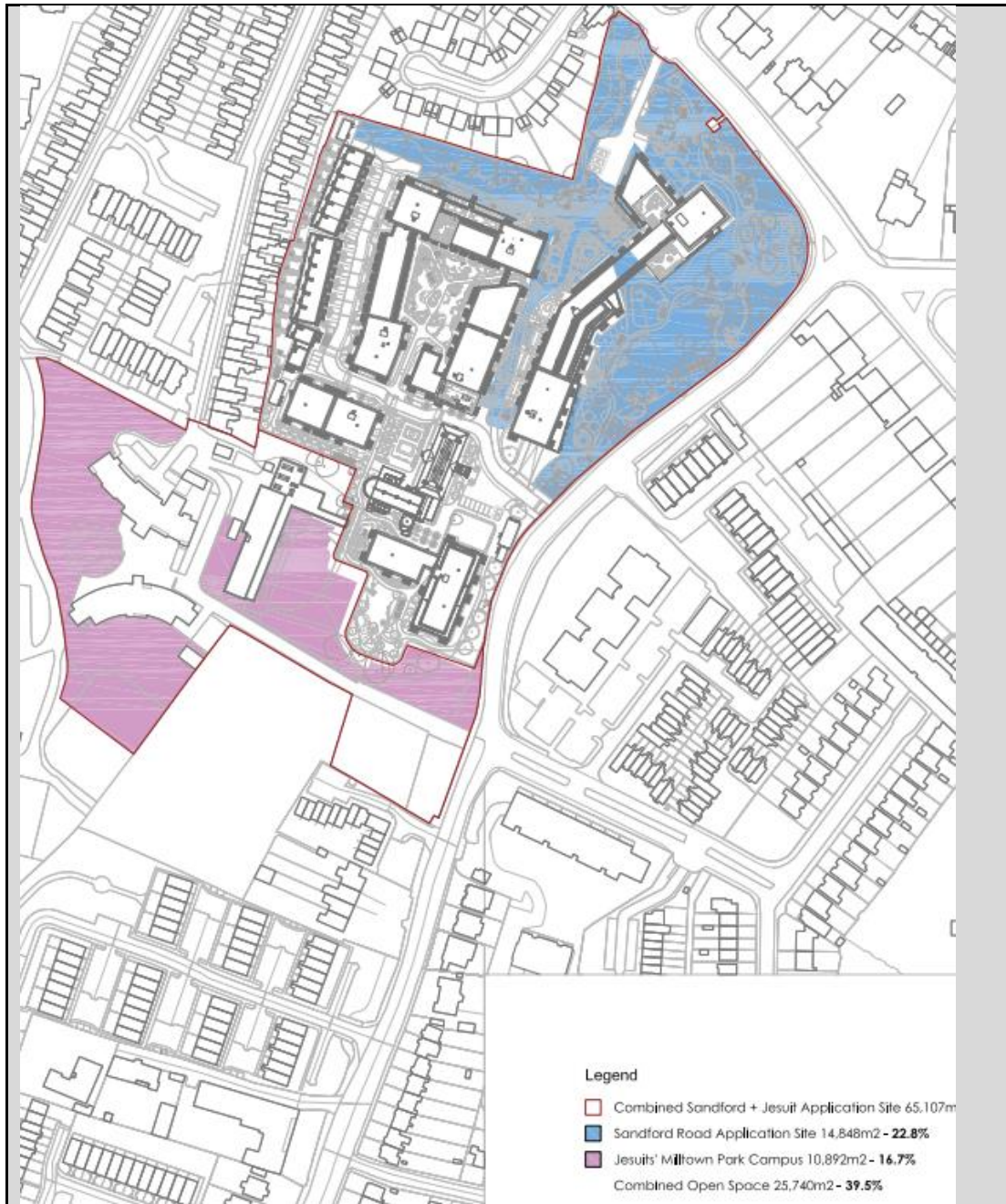


Figure 2.12: OS Map Demonstrating 25% Open Space Will Still be Provided Across the Application Lands and the remaining Jesuit Community lands

(Source: O' Mahony Pike 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 2.13: Public Open Space Provision at the Application Site

(Source: Cameo and Partners Design Studio, 2021)



Figure 2.14: 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 and as demonstrated in Figures 2.13/2.14. As noted above in Section 2.2.1.1, the plaza area has been revised and has removed 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 U² 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 C³ 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 as demonstrated in Figure 2.18 below.

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. The images below provided in Figure 2.15 to 2.18 visually demonstrate the high-quality and functional public open space that will be provided, which includes publicly accessible walkways, grassland, benches, jogging route, fitness areas and play-on-the-way for example.

² 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)

³ Trees of low quality and value (a minimum of 10 years). (CMK, 2021)



Figure 2.15: Illustrations of the Proposed Transformed Public Park

(Source: Cameo and Partners Design Studio, 2021)



Figure 2.16: Illustrations of the Proposed Transformed Public Park

(Source: Cameo and Partners Design Studio, 2021)



Figure 2.17: Illustrations of the Archway Linking the Public Park and the Plaza Area

(Source: Cameo and Partners Design Studio, 2021)



Figure 2.18: Illustrations of the People Utilising the Proposed Plaza Area

(Source: Cameo and Partners Design Studio, 2021)

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



Figure 2.19: Illustrations of the Woodland Glade to the North of Block C

(Source: Cameo and Partners Design Studio, 2021)

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.



Figure 2.20: 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)

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 have never been accessible to the public. 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.

The development has been integrated with the surrounding green infrastructure. Please see Figure 2.21 and 2.22 below which shows how pathways are provided through the site, which will ultimately reach nearby green infrastructure. It is clear that the proposed development will significantly contribute to the green infrastructure of Dublin City.

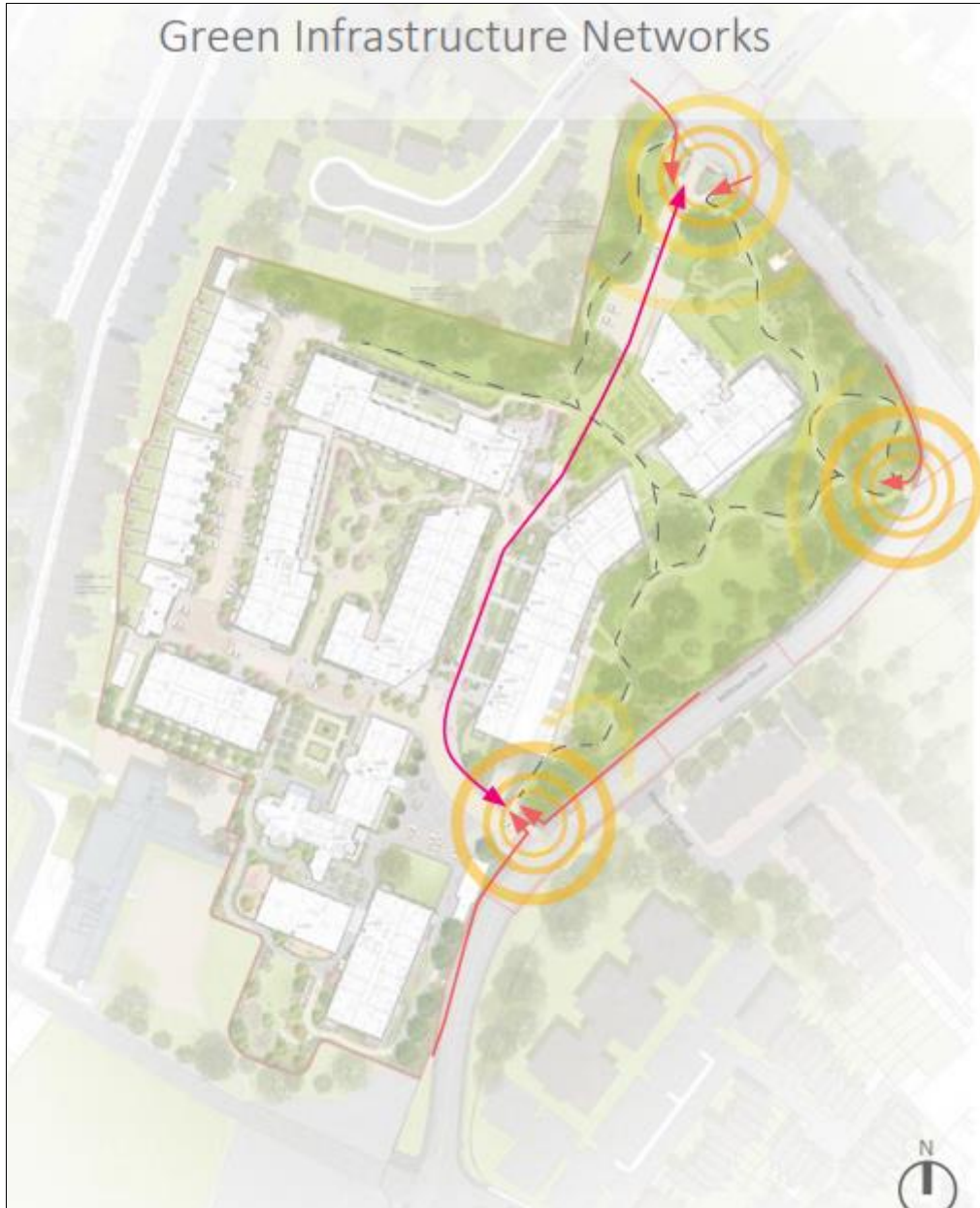


Figure 2.21: Connections to Green Infrastructure Network

(Source: Cameo and Partners Design Studio, 2021)



Figure 2.22: Map Demonstrating the Site’s Location (Indicatively Denoted in Red) with Respect to Green Spaces in the Area

(Source: O’ Mahony Pike Architects Masterplan & Architectural Design Statement, 2021)

2.2.1.3 Summary of Applicant’s Response to Item No.2

The proposed extent and layout of the public open space has responded to the specific requirements of the Development Plan and the majority (25.2%) of the public open space provision (total 34.9%) has been provided in the eastern public park and public plaza which are connected by a permeable and strong connection through the triple height archway of Block A1, providing a strong connection and point of architectural interest within the public open space. The public plaza has been significantly revised to remove vehicular movements, with bollards provided to prevent access, and the Sandford Road access will be a secondary access principally for taxis, set down and deliveries with a small element of mobility impaired parking and thus will have very minimal traffic movements. The revised treatment of the plaza and Sandford Road access will ensure that a safe and useable public plaza space has been provided for the residents and the public to utilise.

Overall, we consider that the extent and layout of the proposed public open space is fully in accordance with the Development Plan requirements.

2.3 Item No. 3 – Height and Design Strategy

An Bord Pleanála stated the following:

'Further consideration and/or justification of the documents as they relate to the height and design strategy. In this regard, the prospective applicant should satisfy themselves that the design strategy for the site as it relates to height provides the optimal architectural solution for this location within the city and should submit a rationale/justification for the heights, focussing in particular on Block A1. Such justification shall include details of alternative studies or design approaches considered.'

2.3.1 Applicant's Response

In response to Item No. 3, we note that O'Mahony Pike Architects have also addressed this item from an architectural perspective in their separate 'Response to ABP + DCC Opinion' document. O'Mahony Pike Architects have comprehensively considered and reviewed the height strategy further to the pre-planning tri-partite meeting in response to Item No. 3. An assessment of alternative layouts, design and height is also considered in Chapter 4 of the Environmental Impact Assessment Report included with this application.

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 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 units; and
- The refurbished Tabor House (4 No. storeys including lower ground floor level) will comprise 24 No. Build-to-Rent units.

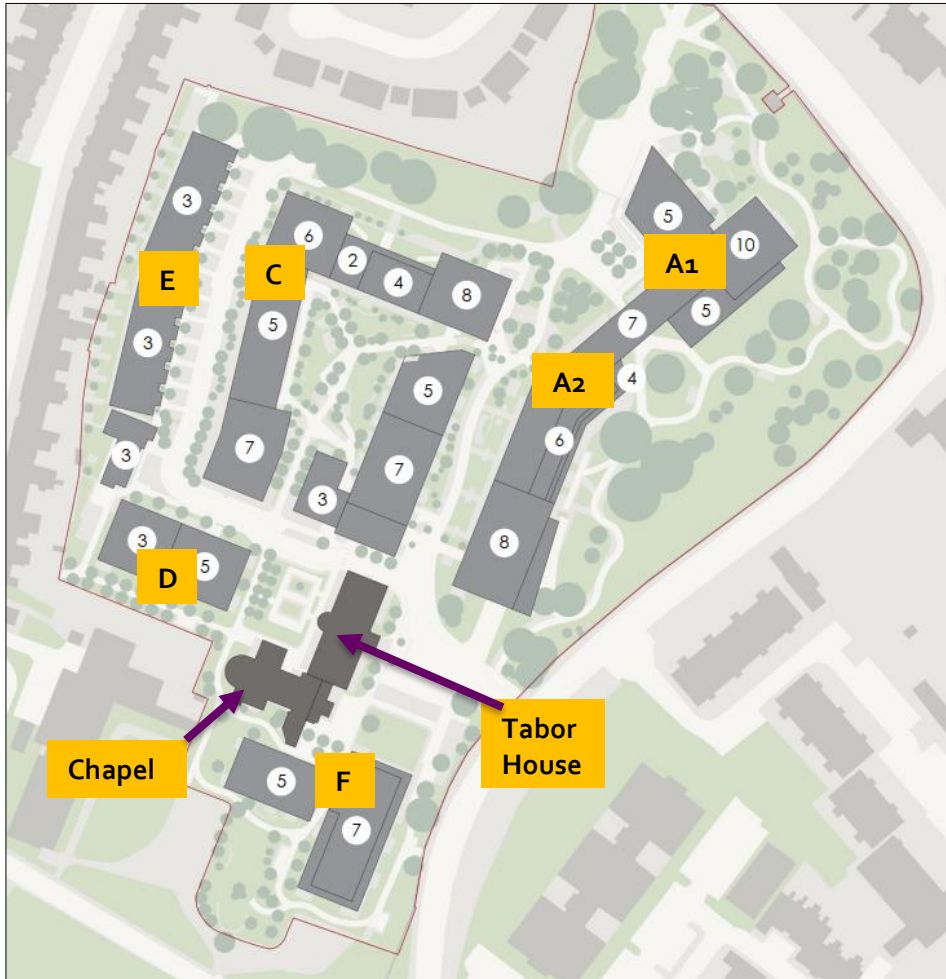


Figure 2.23: Proposed Layout of the Subject Development with the Heights Annotated

(Source: OMP Architects, annotated by Thornton O'Connor Town Planning, 2021)

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.

Tenant Amenity - Further enhancing this pedestrian experience, a full floor of tenant amenities are provided within the building on the seventh floor which directly overlooks the park and facilitates passive surveillance of this edge. The facility is expressed as a mid-level recessed volume with an external amenity terrace located directly South facing enjoying good sunlight with views into the tree belt and park below..'

The key change to the development with respect to building heights since the pre-planning tri-partite meeting is that the height of the Block A1 'visual marker' has been reduced from 13 No. storeys to 10 No. storeys although this was not specifically requested by An Bord Pleanála.

Upon further consideration in response to Item No. 3, it was decided to reduce the 13 No. storey building which we consider represents a more subtle intervention, whilst also still creating a visual focal point within the development at a key arterial crossroads between Milltown, Clonskeagh, Donnybrook and Ranelagh that anchors the public open space.

With the exception of this 10 No. storey Block A1, all other buildings within the site are below the height of the mature tree belt which provides a 'green veil' to the perimeter of the site. Block A1 is an extruded and cranked corner connected with Block A2 to the south and the configuration of the entire Block A is informed by the existing tree belt. The building flanks the public park along the east of the site terminating at a higher point onto Sandford Road at the key junction referenced above.

Please see Figure 2.24 below which demonstrates the various studies undertaken in relation to the proposed A1 visual marker:

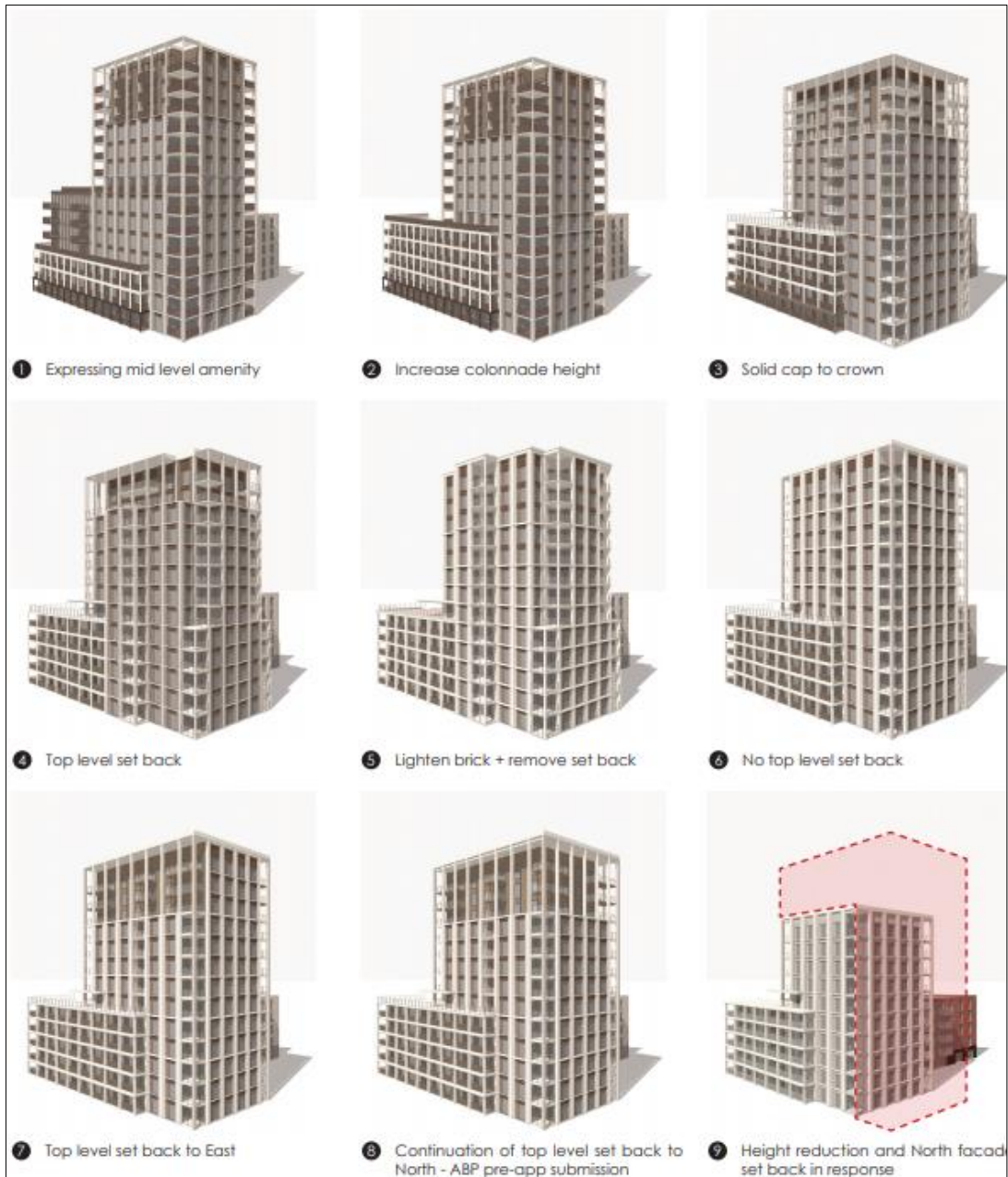


Figure 2.24: Façade Studies of the Urban Mark Building (Block A1)

(Source: OMP Architects Response to ABP + DCC Opinion, 2021)

The separately enclosed *OMP Response to ABP + DCC Opinion Document* notes the following:

'In conjunction with these studies the verified views were used to assess the impact of the proposals on the neighbouring areas. By approaching the overall composition of the Urban Marker from these two contrasting viewpoints, a building form emerged that creates a strong urban form, while minimising the impact on the existing residential context.'

In addition to reducing the height of Block A1, the northern façade of Block A1 has also been set back by c. 4 metres. Please see Figure 2.25 below:

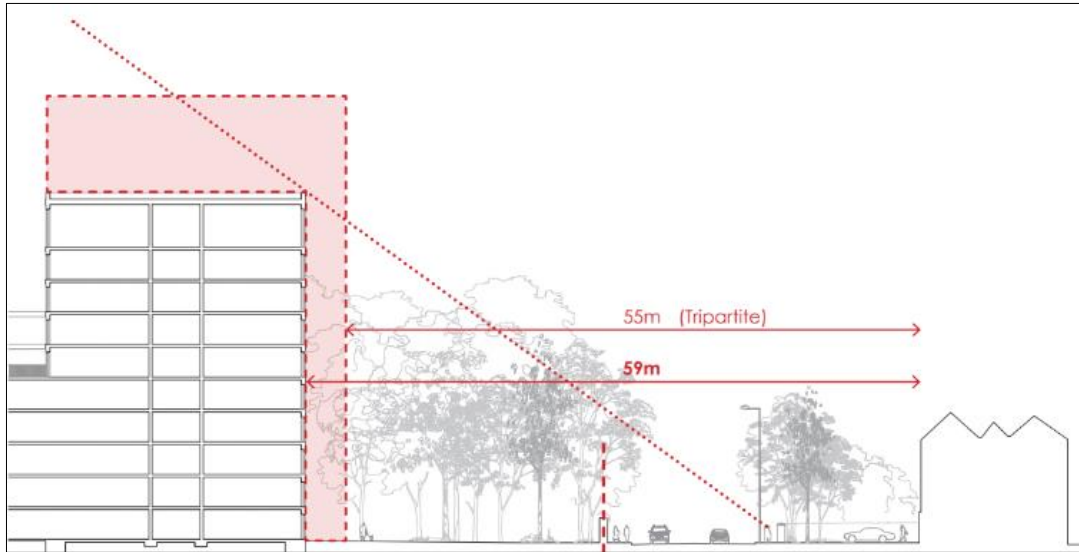


Figure 2.25: Extract Showing c. 4 Metre Setback of the Block A1 Northern Façade

(Source: OMP Architects Response to ABP + DCC Opinion, 2021)

The OMP Response Document notes the following in relation to this setback:

'This provides for increased separation distance to the Northern boundary and existing dwellings along Sandford Road while also allowing for a re-balancing of the buildings overall proportion. This also further expands the area of public open parkland around this North edge providing more 'breathing space' and a greater sense of continuity and connectivity between the Eastern and Northern areas of the existing woodland open space.'

The following image demonstrates the rationale behind providing increased heights at certain locations at the site either as an 'external urban marker/local landmark' or to 'define the plaza and forecourt'.

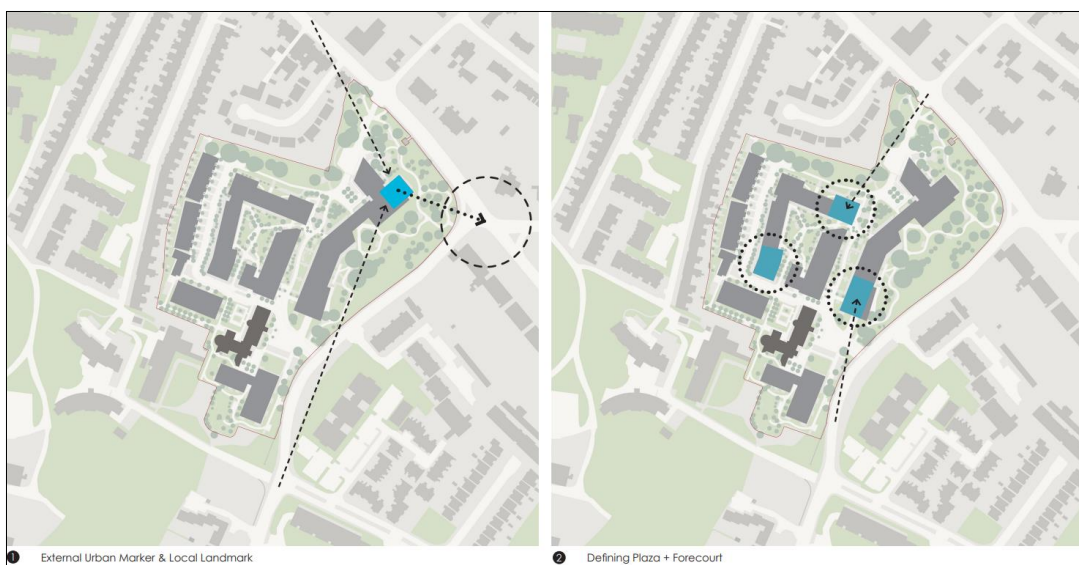


Figure 2.26: Height Rationale Illustration

(Source: OMP Architects Response to ABP + DCC Opinion, 2021)

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. Each block has a subtle shift in direction as a response to its particular urban condition.

It is considered that the proposed development strikes a balance between respecting the surrounding context of the site, whilst also ensuring that this prominent strategic site is appropriately densified, by providing a density of 157.5 No. units per Ha.

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 Avenue Upper 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 residents, and importantly no balconies have been provided to the rear of these units. 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 additional 'inset' has been provided towards the centre of Block C along the northern boundary since pre-application tri-partite stage which will provide a 45 No. metre setback from the rear of the Norwood Park dwellings. As well as providing this setback from neighbouring dwellings, this inset also provides a visual connection from the rear of Tabor House to the public open space to the north of Block C.

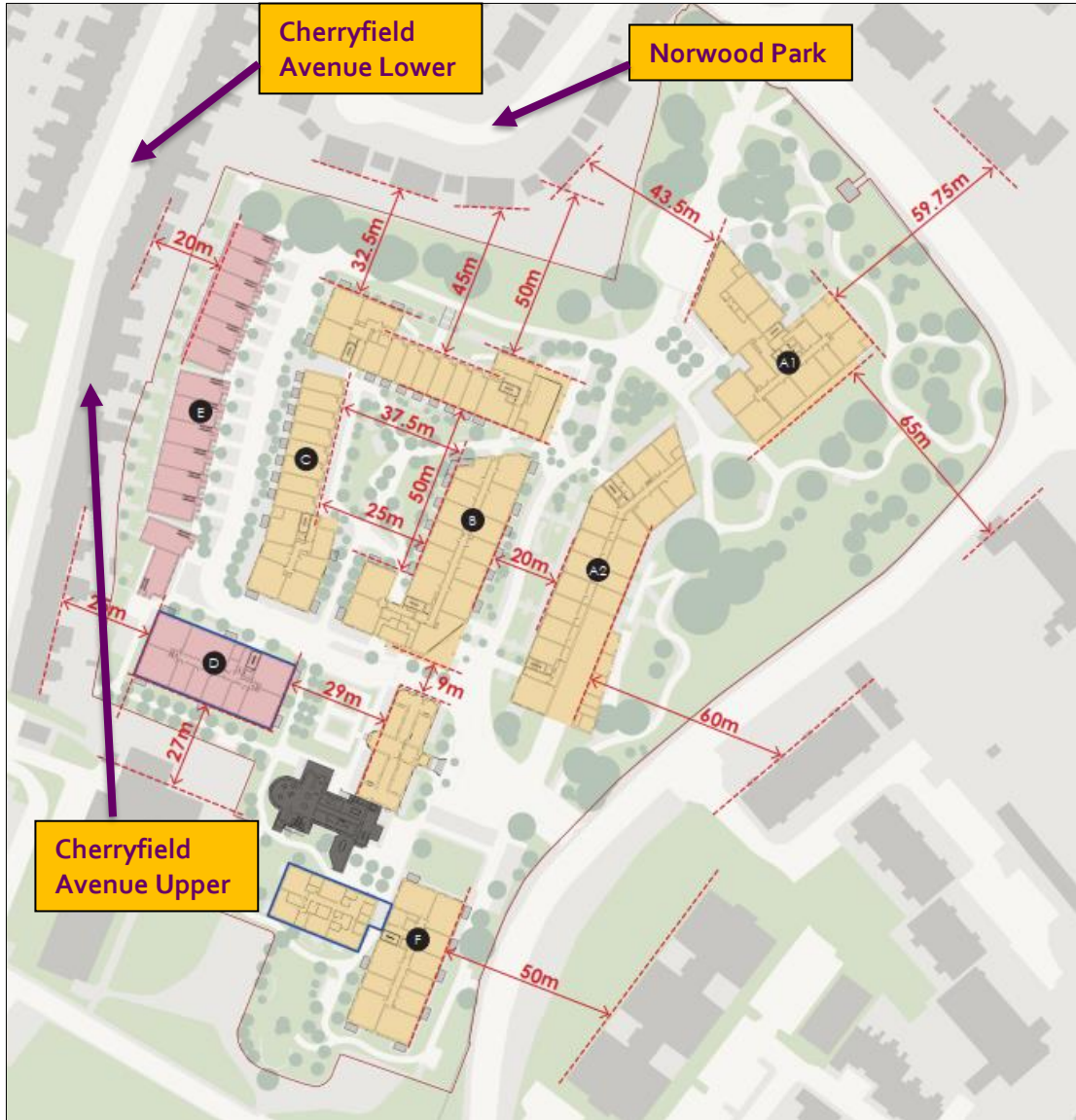


Figure 2.27: Separation Distances Proposed with Large Setbacks from Block C and 3 No. Storey Duplexes and Apartments in Block E Highlighted

(Source: OMP Architects, 2021)

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

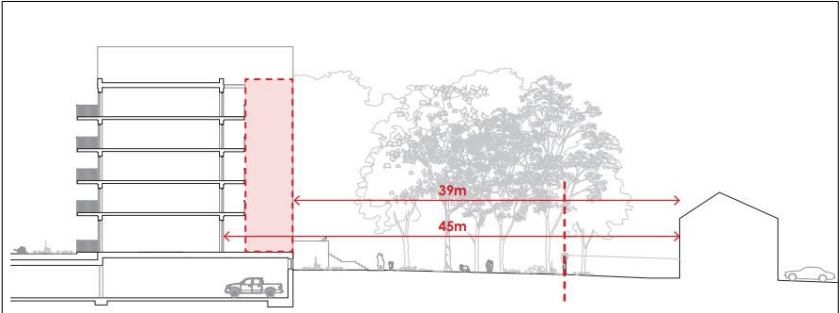


Figure 2.28: Additional Inset Provided to the North of Block C

(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 remaining 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. 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.

Block A1 will improve legibility and wayfinding for the wider area and internally within the site. As noted above, this 10 No. storey element has been reduced from 13 No. storeys since the pre-planning tri-partite meeting. The 10 No. storey element will improve legibility and wayfinding for the wider area and internally within the site.

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 (a) 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).'

Therefore, it is clear that 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 and 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(including part double height at ground floor level)
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 including lower ground level

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 the gable of Block B.

It is our professional planning opinion that the proposed heights of part 2 to part 10 No. storeys across the site is appropriate for this large 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 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.

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. Furthermore, we note that 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 prepared by Thornton O'Connor Town Planning and enclosed separately. In conclusion, we submit that the current planning context is encouraging of developments being designed to achieve additional height at appropriate locations once they don't materially impact on surrounding properties, which is demonstrated through the planning application documents including Daylight/Sunlight Analysis and Landscape and Visual Impact Assessment.

3.0 AN BORD PLEANÁLA INSPECTOR'S OPINION

As noted above, the An Bord Pleanála Opinion includes 3 No. specific items to be addressed in the planning application documentation which are detailed in Section 2.0 above. These 3 No. items were recommended by the An Bord Pleanála Inspector in their Report, in addition to a further 7 No. items (listed as Item Nos. 4 to 10) which did not form part of the official An Bord Pleanála Opinion.

However, we have also provided a response to each of these 7 No. items to ensure that a robust planning application has been submitted.

3.1 An Bord Pleanála Inspector Item No. 4

An Bord Pleanála Inspector stated the following:

'Further consideration and/or elaboration of the documents as they relate to the treatment of existing trees and woodland on the site to include maps and drawings providing clarity with regard to:

- Trees to be retained and trees to be removed.
- The condition of such trees, and
- The rationale for removal – i.e. whether due to condition or development impacts.
- The nature and extent of compensatory planting to be provided.'

3.1.1 Applicant's Response

The Arboricultural Report prepared by the CMK Horticulture & Arboriculture Ltd and enclosed as a separate document with this planning application 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 a Tree Survey and Constraints Plan, a Tree Protection Plan and an Arboricultural Impact Plan.

Some 283 No. trees are proposed to be removed with the remaining 121 No. to be retained. The details are provided below:

- Existing trees – 404 No.
- Trees to be removed – 283 No.
- Trees to be retained – 121 No.
- Proposed trees/large multi-stem – 238 No.

CMK have provided the following breakdown of the Tree Categories:

Category	Number	% of total
A	23	5.6%
B	206	51.1%
C	150	37.1%
U	25	6.2%

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 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.

The Softscape Strategy within the Landscape Design Statement prepared by Cameo and Partners Design Studio 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. (see Section 4.8 above). 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.

As noted by CMK, 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. As this area has a very high density of trees and is currently unusable, the transformation of this space into a public park will be a significant planning gain for the area. This space comprising a high density of trees restricts light from penetrating the canopy thereby reducing the diversity potential of the ground flora and also the areas overall habitat and recreational potential. Therefore, as trees will be removed and replaced by a significant number of large and medium sized trees, this will have a greater long term benefit to local ecology and biodiversity.

3.2 An Bord Pleanála Inspector Item No. 5

An Bord Pleanála Inspector stated the following:

'Further consideration and/or justification of the documents as they relate to the requirement for vehicular access from Sandford Road to the site and to the proposed Plaza area, having regard to the impact of such access on adjoining roads and on the function of identified public open spaces within the site.'

3.2.1 Applicant's Response

As set out in Section 2.2.1.1 of this Response to the ABP Opinion document, which responds to Item No. 2 of the An Bord Pleanála Opinion, the layout of the public plaza has been revised and vehicular parking spaces have been completely removed. We note that bollards will prevent vehicles from accessing the plaza area which will ensure that this plaza space is a safe and enjoyable environment for pedestrians and cyclists.

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 thus will have very minimal traffic movements. The access also facilitates pedestrians and cyclists. The treatment of the public plaza and the Sandford Road access has been revised since the pre-planning tri-partite meeting and we consider that the removal of vehicles from the plaza has significantly improved this space and is now focused on pedestrians and cyclist and will be an attractive space for the public and residents to utilise.

As noted previously, the new Milltown Road access will be the principal vehicular access to the site 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).

It is our professional planning opinion that the revised treatment of the public plaza and the Sandford Road access appropriately responds to Item No.2 of the An Bord Pleanála Opinion (see Section 2.2.1.1) and to Item No. 5 of the Inspector's Report.

3.3 An Bord Pleanála Inspector Item No. 6

An Bord Pleanála Inspector stated the following:

i) 'Further elaboration and / or justification of the documents as they relate to the proposed extent, allocation and management of car parking within the site.'

- ii) *Further consideration of the extent of bicycle parking provision within the development, in the context of the provisions of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities.'*

3.3.1 Applicant's Response

We note that DBFL Consulting Engineers have prepared a Parking Management Strategy which is enclosed separately. In summary, the Strategy notes the following in relation to the allocation and management of the parking spaces:

'All prospective residents will be notified that the proposed scheme is a 'low car allocation' or 'Car Lite' development with no guarantee of access to the on-site residents' car parking provision. Nevertheless, all residents of the proposed residential development apartment scheme will have the opportunity to apply to the on-site management company for both a:

- (i) Residents car parking permit (updated weekly, fortnightly, monthly, quarterly or annually) and subsequently access to a dedicated (assigned) on-site basement or surface level car parking space or*
- (ii) A visitor's car parking permit for a short period of time.*

The building management team will be responsible for the day-to-day management of car parking operations. Residents who request a private car parking space will be allocated on a 'first come, first served' basis. A charge will be applied to obtain a permit with the objective of covering the associated management costs, discouraging long term usage of the car parking space and encouraging travel by sustainable modes of travels such as walking, cycling and public transport for which there are excellent opportunities within and directly adjacent to the development site, such as the Beechwood LUAS stop 1km from the subject site and a bus stop immediately opposite the site on the Sandford Road serving several frequent bus routes.

This relatively short rental period (which can be continued as a rolling contract) and the limited number of spaces will ensure that residents are only assigned a space when one becomes available from time to time, thereby underpinning the 'Car Lite' ethos of the development. Visitor car parking permits will have a shorter rental period of one day, for which residents will be able to apply for through the development management company.

The car parking spaces available at the proposed development will be heavily managed with a clamping enforcement regime being a key component for the effective delivery of the Parking Management Strategy. Misuse of designated vehicle spaces, parking without an up-to-date paid permit and illegal parking practices will all be responded to with vehicle clamping to ensure that parking restrictions are adhered to at surface and basement level. A development Parking Officer will be appointed as part of the Parking Management Strategy in order to enforce the aforementioned measures.

Furthermore, 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

The car parking ratio for the 671 No. residential units has been allocated at a reduced parking rate of 0.50 spaces per unit (excluding creche, taxi and set down spaces). We note that the site is located in a Central and/or Accessible Urban Location (as defined in the *Apartment Guidelines, 2020*) having regard to the site's proximity to excellent modes of public transport (such as Beechwood LUAS stop located 1 km / c. 13 minutes walking distance from the site) and a variety of employment locations such as Clonskeagh Hospital, Belfield Office Park, Ballsbridge, Donnybrook and employers adjacent to the Canal such as Zendesk EMEA Headquarters, Amazon Ireland (see Sections 2.2.1 and 3.4.4 of the Planning Report enclosed separately), which will generate less parking demand than a standard residential development.

In relation to bicycle parking provision, the Parking Management Strategy notes that the *Development Plan* requirement for bicycle parking is 697 No. (residential and creche) and the requirement of the *Apartment Guidelines, 2020* is 1,335 No. (plus 26 No. for the crèche). Please see the table below:

Land Use	No Units / Creche (Beds) /	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			

The proposed development provides a total of 1,361 No. bicycle parking spaces (including 9 No. cargo bicycle spaces) which exceeds the *Apartment Guidelines, 2020* requirement and significantly exceeds the *Development Plan* requirement.

Please see the Parking Management Strategy prepared by DBFL Consulting Engineers enclosed separately for further details in relation to this Item.

3.4 An Bord Pleanála Inspector Item No. 7

An Bord Pleanála Inspector stated the following:

'Further elaboration of measures to avoid overlooking and loss of privacy due to overlooking of existing adjoining residential properties, to include detailed section drawings illustrating their relationship with the proposed development.'

3.4.1 Applicant's Response

O' Mahony Pike Architects have discussed this item from an architectural perspective in their separately enclosed Response to ABP + DCC Opinion document. As set out previously in Section 2.3.1, the scheme layout has been designed to provide the highest forms in the least sensitive locations on the site and generous separation distances have been provided as shown below in Figure 3.1.

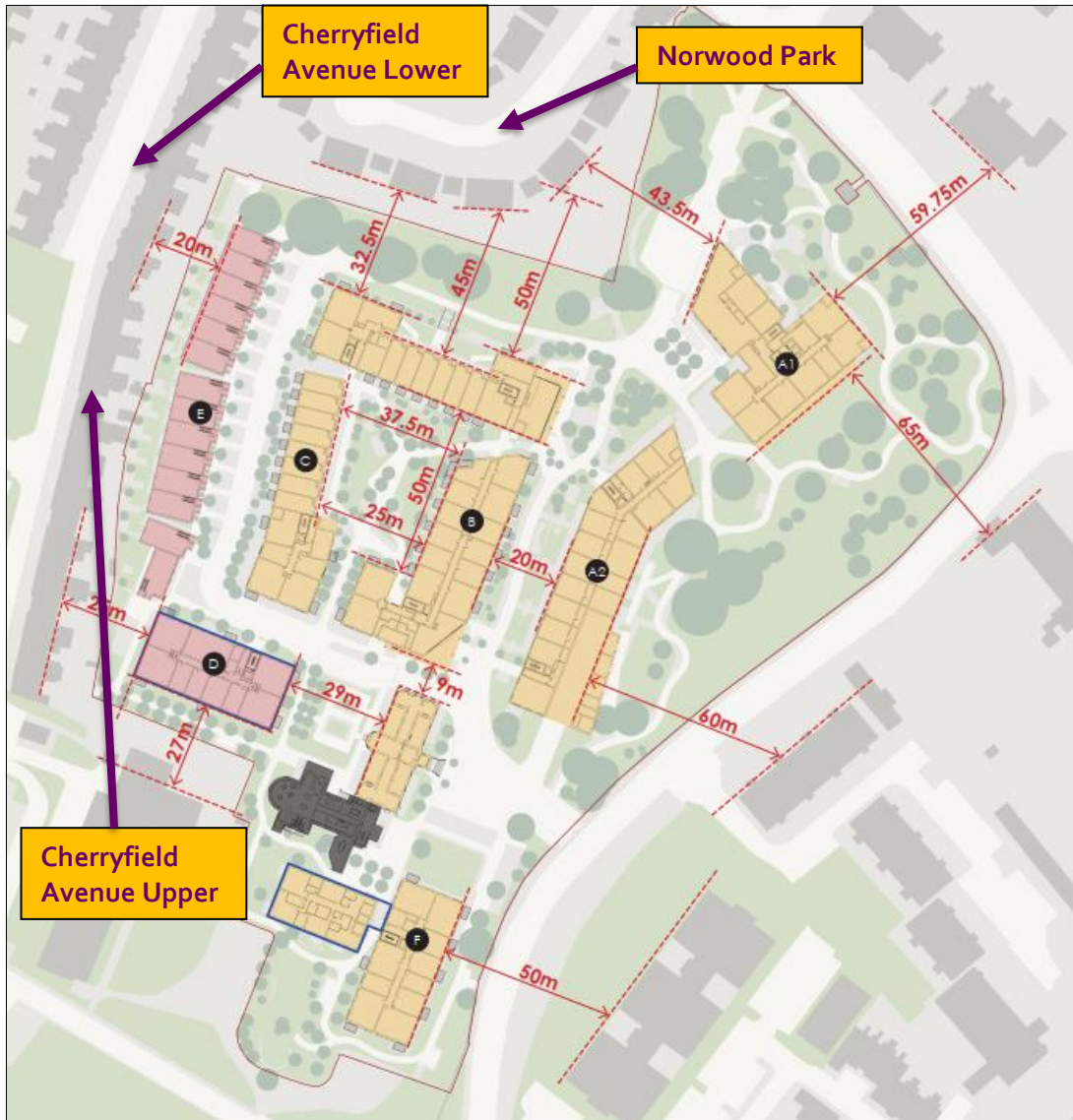


Figure 3.1: Separation Distances Proposed with Large Setbacks from Block C and 3 No. Storey Duplexes and Apartments in Block E Highlighted

(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 Avenue Upper 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 residents, and importantly there are no balconies to the rear of these units which minimises the potential for overlooking. 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 additional 'inset' has been provided towards the centre

of Block C along the northern boundary since pre-application tri-partite stage which will provide a 45 No. metre setback from the rear of the Norwood Park dwellings and thus further reduces the potential for overlooking. As well as providing this setback from neighbouring dwellings, this inset also provides a visual connection from the rear of Tabor House to the public open space (Woodland Glade) to the north of Block C. Norwood Park is also protected by a tree belt/parkland along the northern boundary.

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

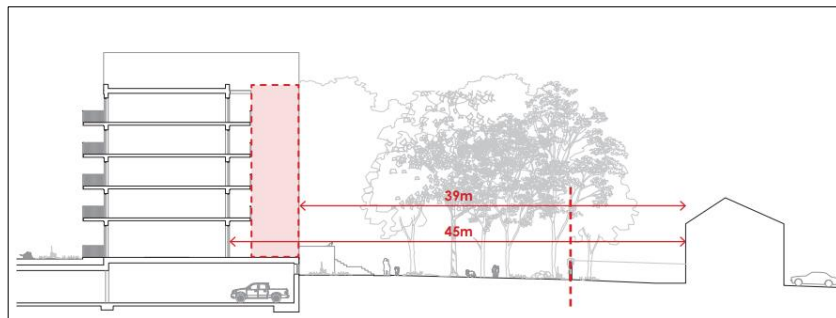


Figure 3.2: Inset Provided to the North of Block C

(Source: OMP Architects, 2021)

Furthermore, we consider that separation distances elsewhere on the site are very generous and which has negated the potential for material overlooking impacts to arise. For example, there is a 50 metre separation distance provided between Block F and the 6 No. storey Cedar Hall development on Milltown Road and a c. 59 metre separation distance between Block A1 (increased from 55 metres at pre-planning tri-partite stage as discussed in Section 2.3.1) and discussed in the OMP Response to ABP + DCC Opinion Report and OMP Architectural Design Statement (which also provide further sections and images).

3.5 An Bord Pleanála Inspector Item No. 8

An Bord Pleanála Inspector stated the following:

'Further elaboration and / or justification with regard to the design and layout of residential accommodation and compliance with the relevant standards set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, in respect of Build-to-Sell and Build-to-Rent residential development. Further elaboration of the documentation should be provided in particular, in respect compliance with SPPR₄ in relation to dual aspect provision, SPPR₇ in respect communal and recreational facilities and SPPR₈ in respect of private amenity space.'

3.5.1 Applicant's Response

In response we note that a full response setting out the scheme's compliance with the relevant standards of the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities* ("Apartment Guidelines, 2020") is provided in the Statement of Consistency Report prepared by Thornton O'Connor Town Planning which is enclosed separately.

In this section we have set out a response to the particular SPPRs referenced in the Inspector's Report.

SPPR 4 – Dual Aspect

In respect of dual aspect provision, we note that the *Dublin City Development Plan 2016- 2022* 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, the updated SPPR4 of the *Apartment Guidelines, 2020* state:

'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, 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. Please see the OMP dual aspect units information which is provided an appendix to the Design Statement for a full breakdown of the dual aspect units. The summary table of dual aspect units is extracted below:

	Total	Dual Aspect	%	North Facing	%
BTS Residential					
Block E _ Duplex Units	28	28	100%	0	0%
Block D	39	20	51%	5	13%
	67	48	72%	5	7.5%
MIX					
% of Total	10%				
BTR Residential					
Block A1	94	43	46%	23	24%
Block A2	140	47	34%	11	8%
Block B	91	28	31%	0	0%
Block C	163	133	82%	0	0%
Block F	92	36	39%	12	13%
TABOR HOUSE	24	8	33%	0	0%
	604	295	49%	46	7.6%
OVERALL MIX					
% of Total	90%				
DEVELOPMENT TOTAL	671	343	51%	51	7.6%
OVERALL MIX					

Figure 3.3: Dual Aspect Breakdown

(Source: OMP Architects, 2021)

SPPR7 – Communal and Recreational Facilities

The *Apartment Guidelines, 2020* set out the following under SPPR7:

'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 part Build-to-Rent in the Statutory Notice and a Legal Covenant is enclosed separately with this planning application.

In relation to part (b) of SPPR7, the proposed scheme will provide high-quality resident support facilities and support services and amenities 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
Tabor House - GF	Lounge	15.2
Tabor House - 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).

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. 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.

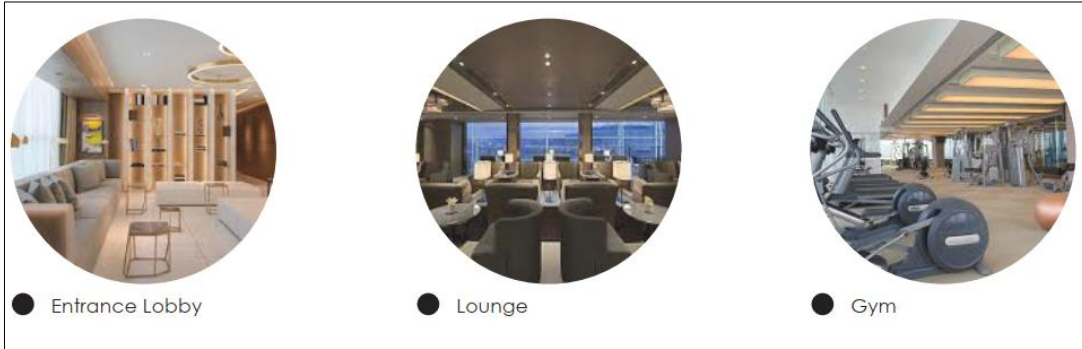


Figure 3.4: Images Demonstrating an Example of the Internal Amenity Spaces to be Provided

(Source: OMP Architects Design Statement, 2021)

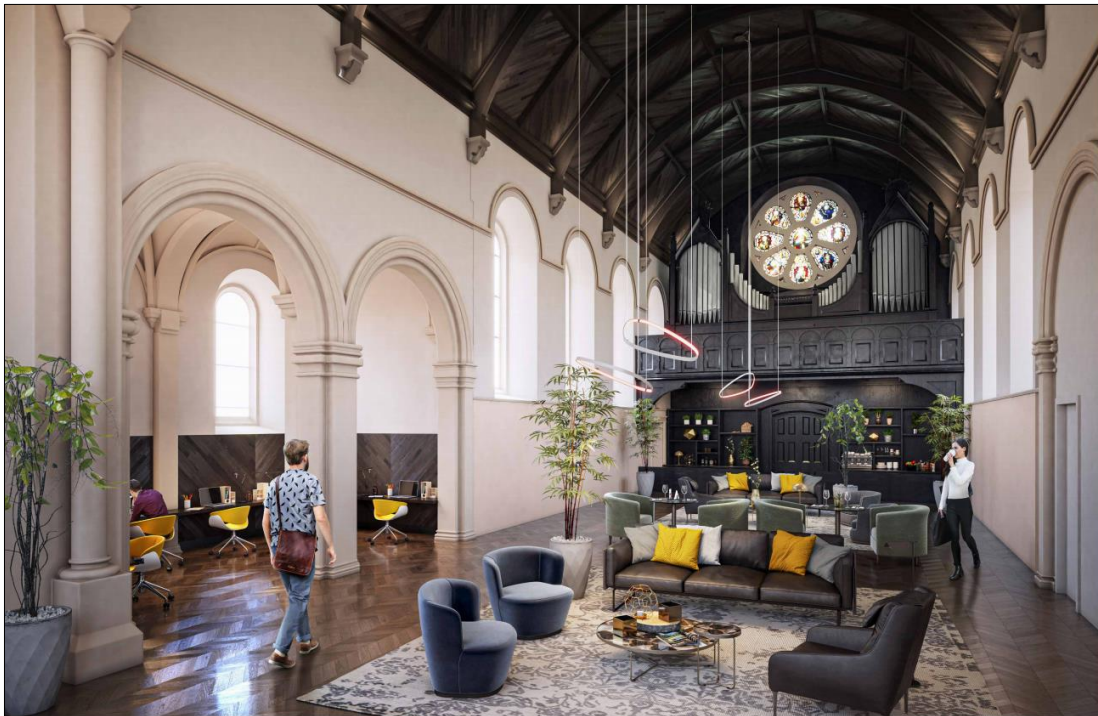


Figure 3.5: Internal CGI of the Proposed Refurbished Chapel

(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. 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.

SPPR8 – (In relation to Private Amenity Space)

The *Apartment Guidelines, 2020* set out the following under SPPR8:

'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.'*

This item raised by the Inspector focuses on private amenity space which is part (ii) of SPPR8. The remaining elements of SPPR8 are considered in the enclosed Statement of Consistency document.

We note that the majority of the Build-to-Rent apartments benefit from private balconies, with the exception of the 110 No. studio units proposed (including studios and 1 No. bedroom units in Tabor House). Each new build studio unit will be provided with a Juliet balcony and it is considered appropriate to avoid providing 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. 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 having regard to Section 6.9 of the *Apartment Guidelines, 2020* which notes:

'Planning authorities are also requested to practically and flexibly apply the general requirements of these guidelines in relation to refurbishment schemes, particularly in historic buildings, some urban townscapes and 'over the shop' type or other existing building conversion projects, where property owners must work with existing building fabric and dimensions. Ultimately, building standards provide a key reference point and planning authorities must prioritise the objective of more effective usage of existing underutilised accommodation, including empty buildings and vacant upper floors commensurate with these building standards requirements'. [Our Emphasis]

This is fully detailed in the Material Contravention Statement enclosed. 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 (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. For example, there is an average of 10.62 sq m per unit of communal external and internal amenity space provided for the residents which will suitably cater for the proposed development in addition to the wider public open spaces.

3.6 An Bord Pleanála Inspector Item No. 9

An Bord Pleanála Inspector stated the following:

'Further justification and / or consideration of the provision of childcare facilities within the development having regard to the scale of development proposed and the level of childcare provision in the surrounding area.'

3.6.1 Applicant's Response

Further to the pre-application tri-partite meeting, the Applicant and Design Team have provided a creche measuring 400 sq m within the ground floor of Block F and which will cater for 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 incorporated 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, and thus will greatly enhance the amenity of the area.

3.7 An Bord Pleanála Inspector Item No. 10

An Bord Pleanála Inspector stated the following:

3.7.1 Applicant's Response

'Regard should also be had to the matters raised under item no. 8 of the planning authority Opinion in respect of Transportation and item no. 9 in respect of surface water drainage and flood risk.'

The following table below principally prepared by DBFL Consulting Engineers summarises the comments raised by Dublin City Council in Item No. 8 and No. 9:

Item	Comment	Response
8 (a)	<p>The provision of improved pedestrian and cyclist environment at the Sandford Road/Belmont Avenue/Site Entrance junction is welcomed by this division. However, the submitted information does not clearly demonstrate the need for a second vehicular access off Sandford Road, particularly considering proposed access arrangements via the proposed Milltown Road entrance.</p> <p>A review of the Sandford Road vehicular entrance should be carried out and vehicular access requirements clearly demonstrated. The potential for creating a pedestrian / cyclist/emergency access should be considered.</p>	<p>Following consultation with Dublin City Council and the An Bord Pleanála Opinion, the design of the proposed vehicular access and route from Sandford Road has been revised to accommodate limited vehicular movements such as deliveries, set down and emergency access. The access shall take form of a shared space with the movement of cyclists and pedestrians prioritised along the link. Access to the plaza area and southwards will be restricted for vehicles with filtered permeability allowing for the movement of pedestrians and cyclists throughout.</p> <p>The case to support the Sandford Road secondary vehicular access has been made within the Parking Strategy and Traffic and Transportation reports. An internal trip generation exercise has been conducted to demonstrate the minimal vehicle movements expected at this site access (maximum of 8 movements anticipated in worst-case peak hour scenario). The 7 No. car parking spaces accessible via the access will only serve Block A1 of the development for deliveries, taxi, drop-off and minimal mobility impaired parking. There will be no through route between the Sandford Road access and the Milltown Road access; controlled bollards will prevent vehicles accessing the pedestrianised central plaza area.</p> <p>See Section 2.2 of this Response Document for further details.</p>

<p>(b)</p>	<p>In respect of proposed junctions and works to public roads and footpaths, the design should be revised having regard to the following:</p> <ul style="list-style-type: none"> a. Any works proposed to the roads and public footpaths should be superimposed on an existing survey drawing to ensure full clarity of the proposed amends. b. The applicant is requested to review the proposed signalization layout of Sandford Road and Belmont Avenue junction in regard to potential impact to existing vehicular entrances. c. The applicant is requested to clarify the status of proposed vehicular gates at both entrances as indicated on submitted drawings <i>Coo111 L2002 Boundary Wall – Elevation 2</i> and <i>Coo111 L2003 Boundary Wall – Elevation 3</i>. The provision of gates will impact the operational capacity of the entrances and also impact traffic on Milltown Road and Sandford Road due to potential queuing of vehicles on the carriageway. d. The location of the proposed toucan crossing on Milltown Road should take into account the adjacent entrance / exit onto Mount Sandford to ensure that drivers exiting Mount Sandford, travelling south have a clear sightline to the toucan crossing. e. Upgrades to the Milltown Road/Sandford Road Junction is proposed as part of the proposed Clonskeagh to City Centre Cycle Route which will impact on the traffic assessment. Further consultation with the Environment and Transportation Department to ascertain the proposed scope of works is required. f. The red line boundary should be updated for the application and should also be accompanied with a Letter of Consent. If applicable, a drawing should also be submitted outlining any areas proposed to be Taken in Charge by Dublin City Council. All works are required to be designed in 	<ul style="list-style-type: none"> a. All works are presented on the Engineering drawings submitted as part of the planning documentation. b. Following consultation with Dublin City Council, the Sandford Road/Belmont Avenue junction has been upgraded with improved crossing facilities for vulnerable road users rather than full signalization of the junction. The junction layout has been upgraded with the potential for full signalization in the future. The updated roads layout is shown in DBFL Drawing 190226-DBFL-RD-SP-DR-C-1001. c. The existing gates at Sandford Road vehicular entrance will be retained at the entrance but will remain open at all time. There will be no gates provided at the new vehicular access from Milltown Road. d. The Milltown Road site access and the adjacent toucan crossing have been appropriately designed, with reference to DMURS guidance, as outlined in the DMURS design statement accompanying this planning application. This has been discussed further and agreed in consultation with Dublin City Council Environment & Transportation Department. e. This has been discussed further and agreed in consultation with Dublin City Council Environment & Transportation Department. f. The red line has been updated and a Letter of Consent received from Dublin City Council accompanies this planning application.
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	<p>accordance with the Construction Standards for Roads and Street Works in Dublin City Council.</p>	
(c)	<p>The internal site layout and design proposed should be revised to include the following items:</p> <p>a. The location and type of uncontrolled crossings on the main arterial streets within the development are not clear from the drawings submitted. The drawings should be updated to clearly show the uncontrolled pedestrian crossing points and also indicate clearly the raised road surface.</p> <p>b. Pedestrian priority should be provided across the proposed basement entrance and should be clearly shown on layout drawings.</p> <p>c. A review of pedestrian and cyclist desire lines within the development should be carried out to allow a more legible route through the development. Consideration should be given to the provision of dropped kerbs etc. to facilitate cyclist access to various parts of the site.</p> <p>d. A review of footpath widths should be carried out to ensure sufficient room is provided for pedestrians and cyclists travelling through the site. A minimum width of 3 metres should be considered on key routes (desire lines) where a shared surface between pedestrians and cyclists is proposed.</p> <p>e. A review of the surface car parking layout within the proposed development, namely the parking proposed within the Forecourt and Plaza areas. Consideration should be given to minimising the impact the parking layout has on pedestrian routes.</p>	<p>a. This is shown on the engineering drawings submitted with the planning application.</p> <p>b. Pedestrian priority across the basement entrance will be indicated through material finishes and signage.</p> <p>c. Pedestrian and cyclist permeability is emphasised in the design of the site layout. Ramps/raised crossings are provided at key routes within the site to enhance cyclist and mobility impaired accessibility through the site.</p> <p>d. 1.8m to 2.0m footpath widths are typically provided. Shared surface routes (e.g. route across podium linking the Milltown Road entrance to the Sandford Road entrance) have been amended to provide a minimum width of 3 metres.</p> <p>e. A detailed analysis of the available car parking spaces and their management has been provided within the Parking Strategy report prepared by DBFL Consulting Engineers and impact on pedestrian routes has been minimised.</p>
(d)	<p>Clarification is required in respect to the proposed car parking provision. The following issues should be addressed:</p> <p>a. The proposed car parking ratio for Build-to-Rent units is considered low for the location which is confirmed by the census data. The reasoning behind the disproportionate car parking ratios proposed for the Build-to-Sell</p>	<p>a. The car parking ratio is 0.50 car parking spaces per residential apartment (ratio excludes creche, taxi and drop-off spaces). Justification supporting this car parking ratio is included within the Parking Strategy report, based on the nature of the anticipated future tenant demographic, national best practice</p>

	<p>component and the Build-to-Rent component have not been adequately demonstrated. A review of the car parking ratios for the proposed development should be carried out including a reallocation of spaces to Build-to-Rent units.</p> <p>b. The applicant should provide an updated drawing indicating the location of Build-to-Sell resident car parking, Build-to-Rent car parking, car share spaces (Public and resident) and car share spaces (Resident only) and visitor/drop-off spaces.</p> <p>c. Clarity on how the two car share schemes are to operate and where the spaces are to be located is required. Consideration should be given to the provision of a number of electric vehicle car share parking spaces.</p> <p>d. Provision of EV parking should be clarified for both on-street and basement parking spaces. Future proofing infrastructure (ducting, chambers etc.) to allow for the future installation of electrical charging points to serve all spaces within the basement level and on-street parking spaces should be confirmed.</p>	<p>and DHPLG guidance for Central and/or Accessible Urban Locations.</p> <p>b. The layout of both the ground level and basement level car parking spaces has been set out in the Parking Strategy and the Traffic and Transport reports, showing the location of different car parking spaces (residents spaces, creche, drop-off, car share etc.).</p> <p>c. 5 No. GoCar spaces will be located at surface level and 5 No. development-owned car share vehicle spaces will be provided at basement level. The location of these spaces and the 35 No. electric vehicle spaces has been outlined within the Parking Strategy and Traffic and Transport reports.</p> <p>d. All 35 No. electric vehicle charging spaces will be provided at basement level, 4 No. of these spaces will be provided as mobility impaired spaces.</p> <p>O' Connor Sutton Cronin Consulting Engineers have advised that 100% Electric Vehicle charging capacity has been included for in the ESB substation sizing and the design of the main switchboard which will allow for connection of the future loads. This above approach means that should future expansion be required to the electric vehicle charging, a suspended containment installation could be installed in the underground carpark to serve these Chargers. Ducting can be provided for any surface parking if required in future.</p>
(e)	<p>The following issues in respect to the bicycle parking provision should be addressed within any forthcoming application:</p> <p>a. This division is concerned that insufficient secure long term cycle parking provision has been accommodated within the proposed development. A review of the quantum of secure long term cycle parking should be carried out. Clarity on the location of the total secure</p>	<p>a. A total of 1,001 No. long stay cycle spaces have been provided in the basement, within secured bicycle shelters. Some 5 No. of these spaces are cargo bicycle spaces.</p> <p>b. Basement long stay cycle spaces will be provided as double stacked parking with the exception of the cargo spaces. Surface level bicycle shelters for visitors</p>

	<p>resident parking spaces is also required. Visitor cycle parking should be clearly identified in the plans and distinguished from residential cycle parking.</p> <p>b. The applicant should clarify the type of bicycle parking proposed for resident and visitor cycle parking e.g. Sheffield type stands or double stack parking and demonstrate that each store area has the capacity in height, width and adequate separation distance provided between opposing cycle racks/stands to facilitate an orderly parking scheme. Residents should be allocated specific cycle parking areas, and access to the cycle parking areas should be secure and controlled via a key/fob control access. Cargo cycle parking provision should be provided.</p> <p>c. The applicant is requested to clarify the width of the dedicated cycle ramp and provide details of how the ramp is to be incorporated into the basement ramp entrance/exit in terms of potential interaction between cyclists and vehicles and how they will be managed.</p> <p>d. Staff cycle parking and changing facilities should be clarified.</p>	<p>will comprise of double and single stacked cycle parking (154 No.) and will have open access for visitors. The remaining surface level bicycle parking for visitors (206 No.) will be provided as Sheffield stands. A total of 9 No. cargo cycle spaces are provided, 5 No. at basement level and 4 No. at surface level.</p> <p>c. The position of the dedicated two-way cycle ramp has been relocated to the northern boundary of the development basement to avoid potential interaction with vehicles using the vehicular ramp to the basement (Block C). The cyclist ramp will be accessible to cyclists via the Sandford Road access and other cyclist paths (e.g. shared surface route from the Milltown Road access) leading to the 2.5 metre ramp.</p> <p>d. 26 No. of the development cycle parking provision is allocated as creche parking. Surface level visitor cycle spaces will be available for use by staff based at the development.</p>
(f)	<p>Clarification is required in respect of service including refuse and ESB Networks access arrangements:</p> <p>a. Swept path analysis of fire tender access should be provided.</p> <p>b. The location of temporary waste storage areas should be clarified.</p> <p>c. The applicant should provide swept path analysis drawings indicating that vehicular access to ESB Sub-stations and meter rooms can be provided in accordance with ESB Networks requirements.</p>	<p>a. The swept path analysis for the fire tender route has been shown on DBFL Drawing 190226-DBFL-RD-SP-DR-C-1002.</p> <p>b. Details are outlined within the TTA report and Operational Waste Management Plan (Appendix 14.2 of the EIAR).</p> <p>c. A swept path analysis for the refuse vehicle route through the site has been provided in DBFL Drawing 190226-DBFL-RD-SP-DR-C-1003.</p>
(g)	<p>The final traffic impact assessment shall consider construction traffic impact and clarity on proposed development phasing shall be provided. If applicable as a result of proposed development phasing, the impact assessment shall also consider the cumulative impact of</p>	<p>Please see enclosed Traffic and Transport Report and the EIAR Transportation Chapter (Chapter 15) prepared by DBFL Consulting Engineers.</p>

	both construction and operational traffic generated from the site.	
(h)	The developer shall be obliged to comply with the requirements set out in the Code of Practice	Noted
9.	<p>Having regard to the report on file from the Drainage Division the following information is requested:</p> <ul style="list-style-type: none"> The developer shall submit a revised flood risk assessment for the proposed development confirming to the Drainage Division that the development has been designed such that the risk of flooding to the development has been reduced as far as is reasonably practicable, and that the proposals do not increase the risk of flooding to any adjacent or nearby area. Where it is proposed to increase the size of the proposed public surface water sewer, detail of investigations to establish route and confirmation the minimum self cleansing velocity criteria will be met for the proposed surface water sewer. 	<p>The content of DCC Drainage Division's report was discussed between Brendan Keogh (DBFL Consulting Engineers) and Maria Treacy (DCC Water Services) as noted below;</p> <ul style="list-style-type: none"> As requested by DCC, the Site Specific Flood Risk Assessment has been updated to include reference to the <i>Dublin City Development Plan 2016-2022 SFRA</i>. It is also noted that the Site Specific Flood Risk Assessment has been carried out in accordance with the requirements of "<i>The Planning System and Flood Risk Management, Guidelines for Planning Authorities</i>" and its <i>Technical Appendices</i> (Office of Public Works, November 2009) and that adjacent areas will not be impacted by the development up to the 1% AEP flood event. Detailed topographic and GPR surveys were carried out along to the proposed outfall route (Milltown Road, through the junction of Milltown Road / Sandford Road and Eglinton Road) to assess feasibility with regard to the location of existing services. The development's surface water outfall has been designed based on a self - cleansing velocity of 1.0 m/sec (300mm diameter @ min. gradient of 1/252).

4.0 STATUTORY CONSULTEES

As requested, the Applicant has issued a copy of the application documentation to the following Statutory Consultees:

1. Irish Water
2. National Transport Authority
3. Minister of Culture, Heritage and the Gaeltacht
4. An Taisce – the National Trust for Ireland
5. Heritage Council
6. An Comhairle Ealaíonn
7. Fáilte Ireland

5.0 CONCLUSION

It is our professional planning opinion that the aforementioned responses with the supporting technical reports address the specific items raised in An Bord Pleanála's Opinion. We trust that this document fully responds to all of the points raised by An Bord Pleanála in their Opinion and we submit that the proposed development represents the proper planning and sustainable development of this currently underutilised site.

Yours sincerely

A handwritten signature in black ink that reads '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

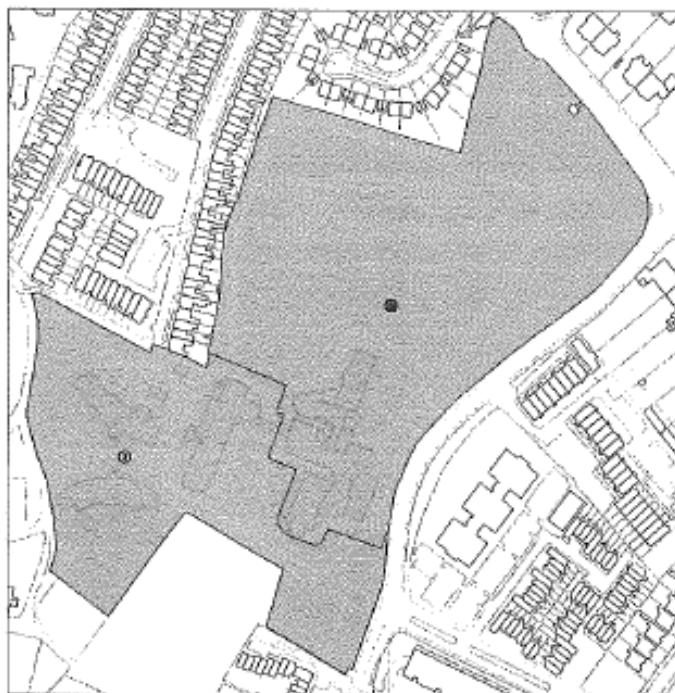
12th August 2021

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.



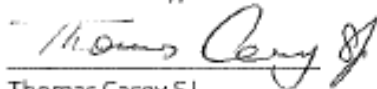
The Jesuits originally purchased the entire Milltown Park campus in the 1850's and subsequently adapted and extended the original period residence to provide a novitiate followed by Schools of Philosophy and Theology and later a community chapel, theatre and library. For more than 160 years the role 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.

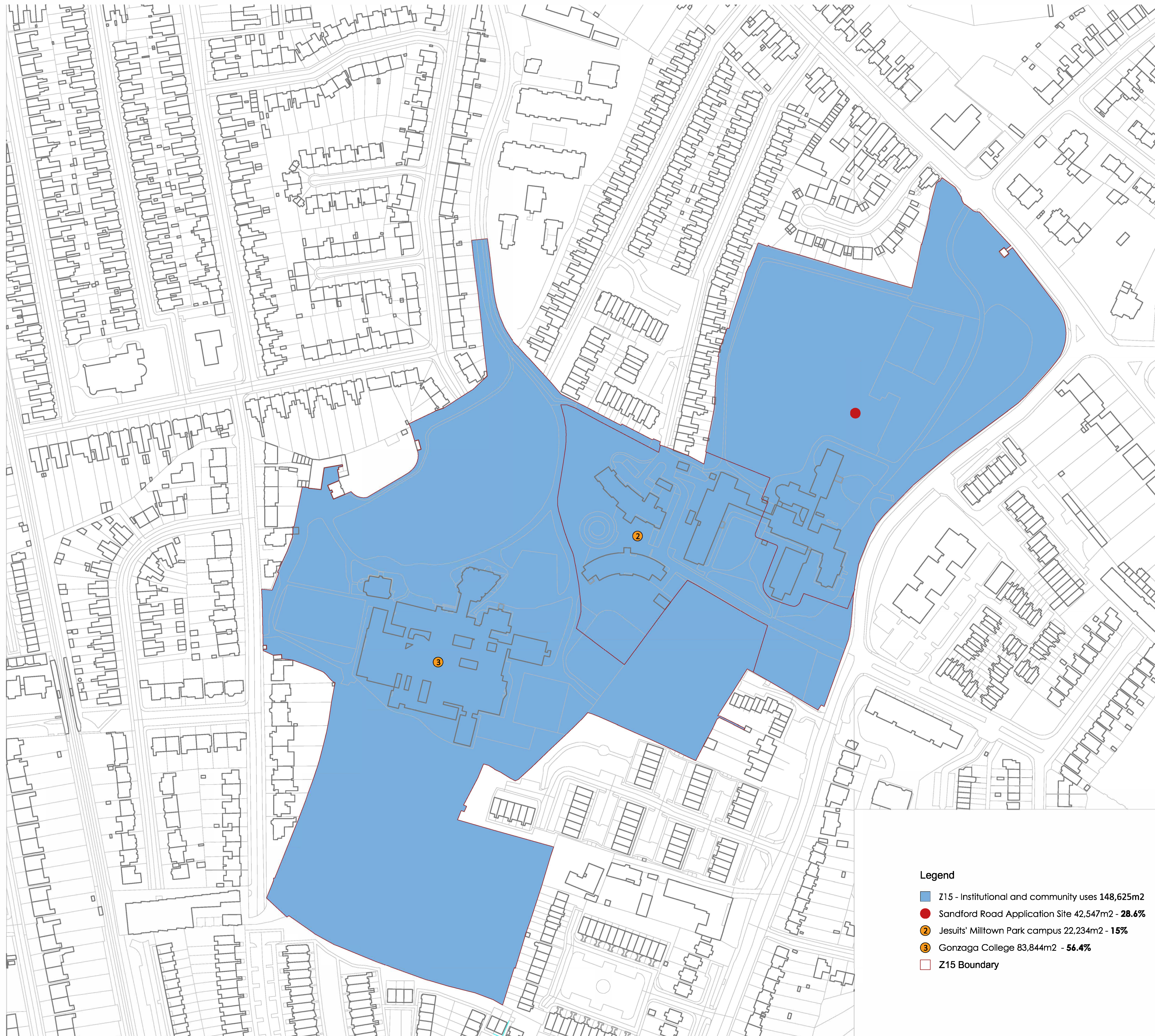
Yours sincerely,

A handwritten signature in black ink, appearing to read 'Thomas Casey SJ', written over a horizontal line.

Thomas Casey SJ
Rector, Jesuit Community Milltown Park,
Milltown Road, Dublin 6



Appendix B – Z15 Maps Prepared by OMP Architects



Legend

- Z15 - Institutional and community uses 148,625m²
- Sandford Road Application Site 42,547m² - **28.6%**
- 2 Jesuits' Milltown Park campus 22,234m² - **15%**
- 3 Gonzaga College 83,844m² - **56.4%**
- Z15 Boundary

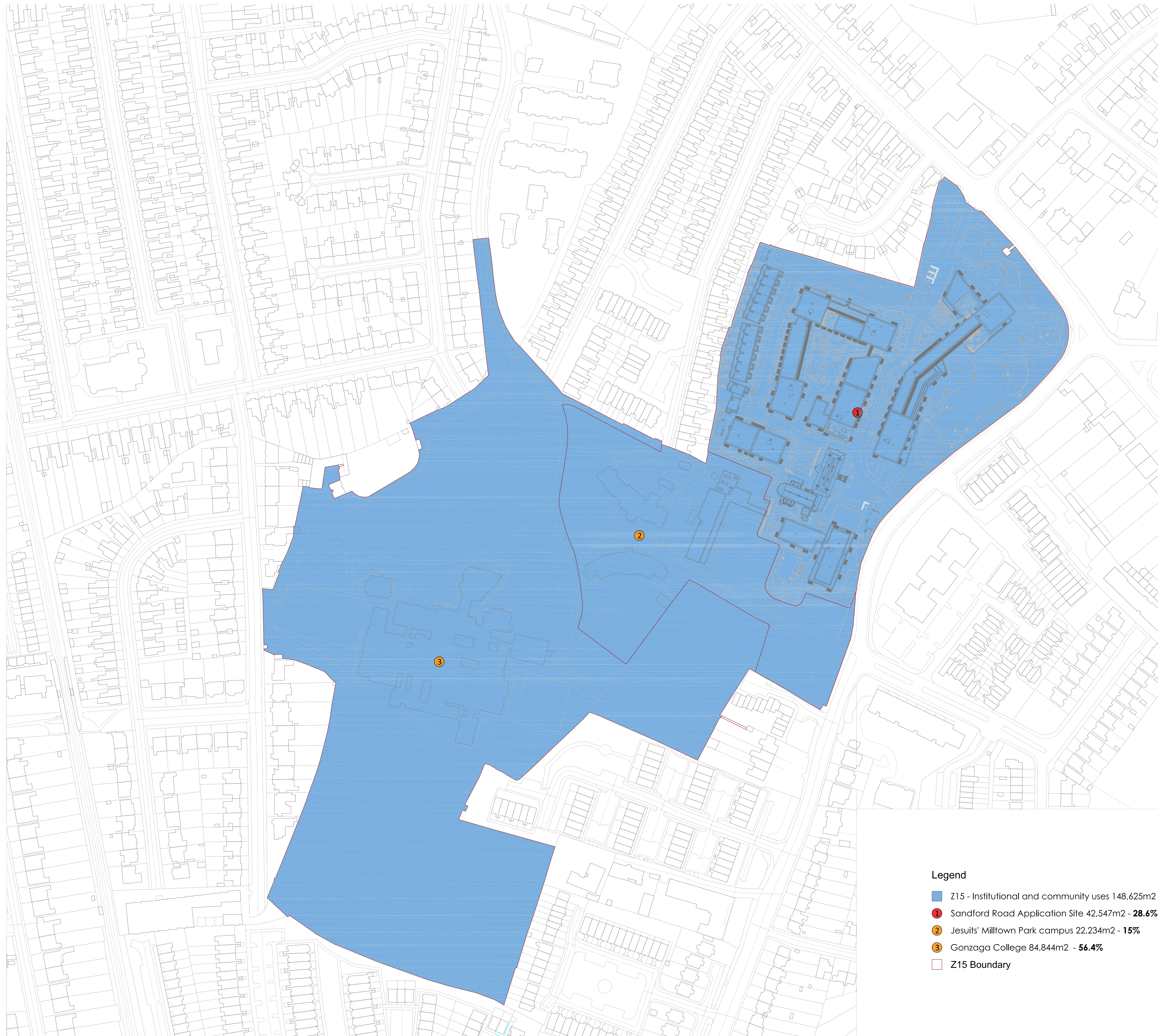
Revision Description	Date	Rev. No.	Issued by

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o'mahony pike		Project No.: 19037	Scale @ A0: 1:1000
architecture urban design		Project Lead: DM	Date Printed: 27-08-2021
Dublin	Cork	Drawn By: LB	Current Rev.: 1
The Chapel	26 South Mall	Model No.: 19037-OMP-ZZ-ZZ-DR-A-1010	
tel: +353 1 222 9400	Mount St. Anne's		
	Milltown, Dublin 6		
fax: +353 1 283 0822	Co. Cork		
www.omahonypike.com	D08 W52 Ireland		

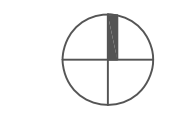
Project: Sandford Road
 Location: Milltown Park, Sandford Road, Dublin 6
 Client: Sandford Living Ltd.

Drawing Title: Site Plan - Existing Z15 Zoning Land
 Drawing No.: 19037-OMP-ZZ-ZZ-DR-A-1010



Legend

- Z15 - Institutional and community uses 148,625m²
- 1 Sandford Road Application Site 42,547m² - **28.6%**
- 2 Jesuits' Milltown Park campus 22,234m² - **15%**
- 3 Gonzaga College 84,844m² - **56.4%**
- Z15 Boundary



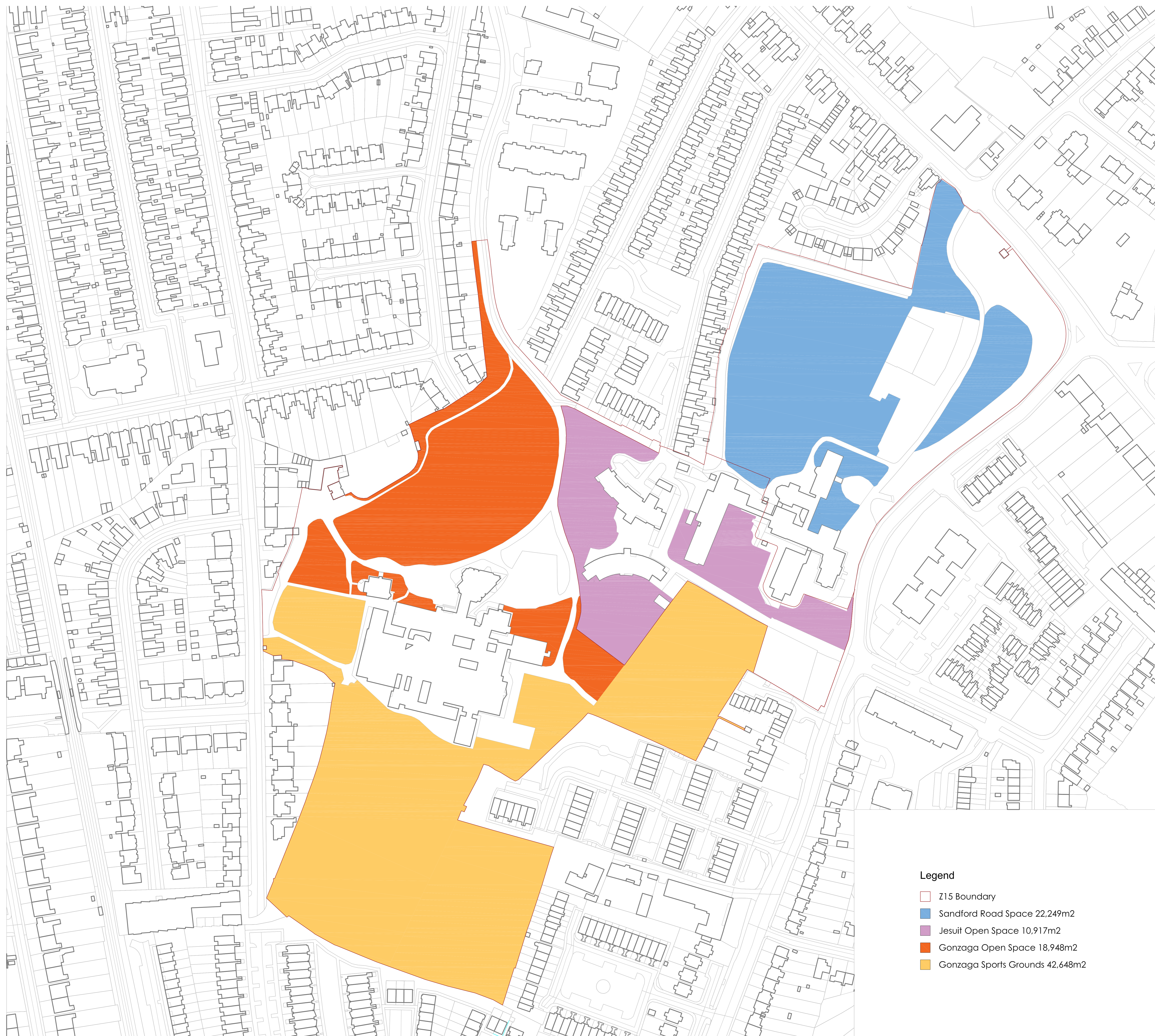
Revision Description	Date	Rev. No.	Issued by

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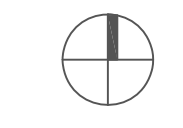
o'mahony pike <small>architecture urban design</small> <small>email: info@omahonypike.com</small> <small>tel: +353 1 202 7400</small> <small>www.omahonypike.com</small>	<small>The Chapel</small> <small>Mount St. Anne's</small> <small>Milltown, Dublin 6</small> <small>D06 W6C2 Ireland</small>	<small>Cork</small> <small>26 South Mall</small> <small>Cork City</small> <small>Co. Cork</small> <small>T12 K2RY Ireland</small>	Project No.: 19037	Scale @ A0: 1:1000
			Project Lead: DM	Date Printed: 27-08-2021
		Drawn By: LB	Current Rev.: 1	
		Model No.: 19037-OMP-ZZ-ZZ-DR-A-1011	Purpose:	

Project: Sandford Road
 Location: Milltown Park, Sandford Road, Dublin 6
 Client: Sandford Living Ltd.

Drawing Title: Site Plan - Proposed Z15 Land
 Drawing No.: 19037-OMP-ZZ-ZZ-DR-A-1011



- Legend**
- Z15 Boundary
 - Sandford Road Space 22,249m²
 - Jesuit Open Space 10,917m²
 - Gonzaga Open Space 18,948m²
 - Gonzaga Sports Grounds 42,648m²



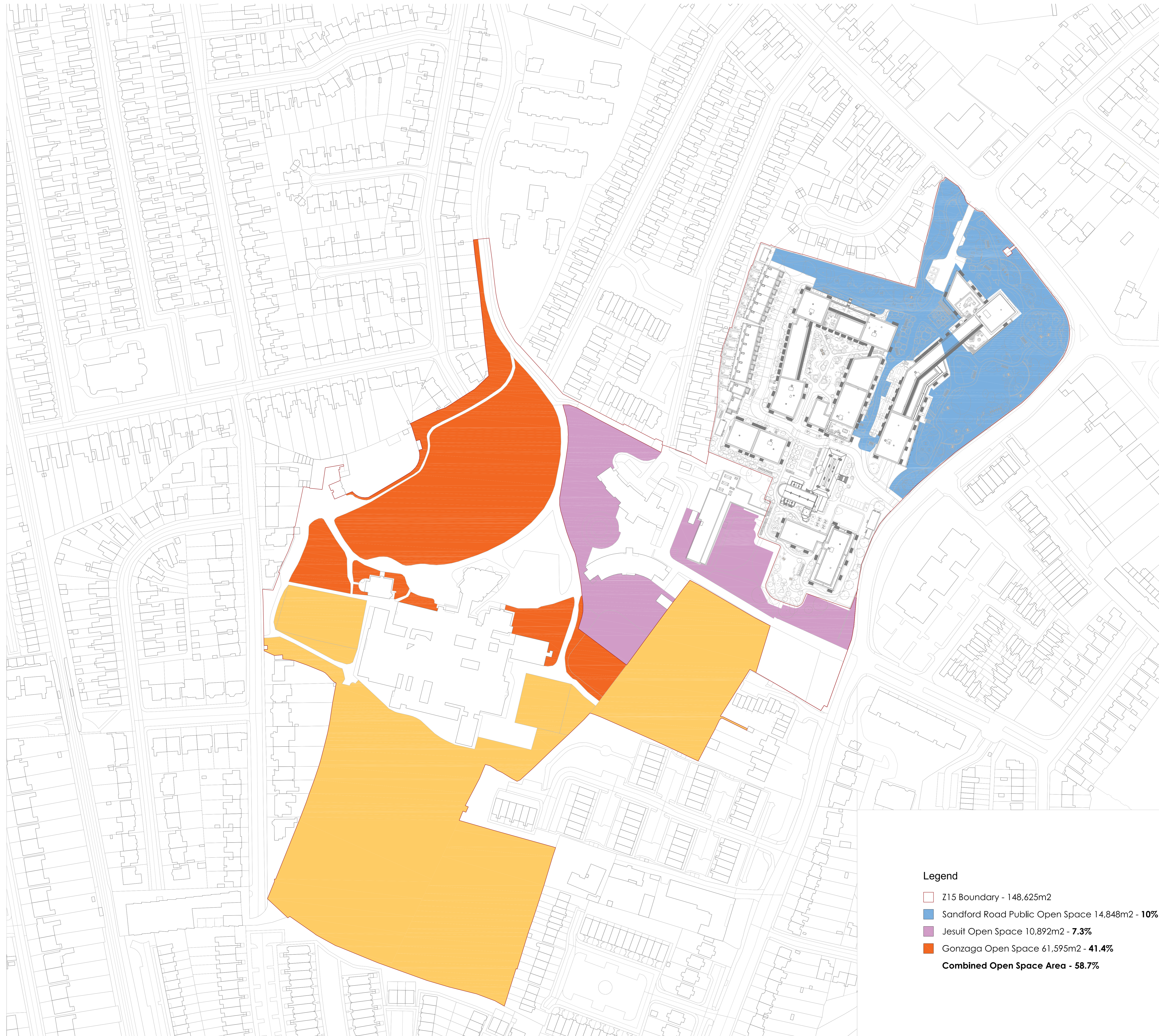
Revision Description	Date	Rev. No.	Issued by

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			Project Lead: DM	Date Printed: 27-08-2021
			Drawn By: LB	Current Rev.: 1
			Model No.: 19037-OMP-ZZ-ZZ-DR-A-1012	Purpose:

Project: Sandford Road
 Location: Milltown Park, Sandford Road, Dublin 6
 Client: Sandford Living Ltd.

Drawing Title: Site Plan - Existing Land Use
 Drawing No.: 19037-OMP-ZZ-ZZ-DR-A-1012



Legend

- Z15 Boundary - 148,625m²
 - Sandford Road Public Open Space 14,848m² - **10%**
 - Jesuit Open Space 10,892m² - **7.3%**
 - Gonzaga Open Space 61,595m² - **41.4%**
- Combined Open Space Area - 58.7%**

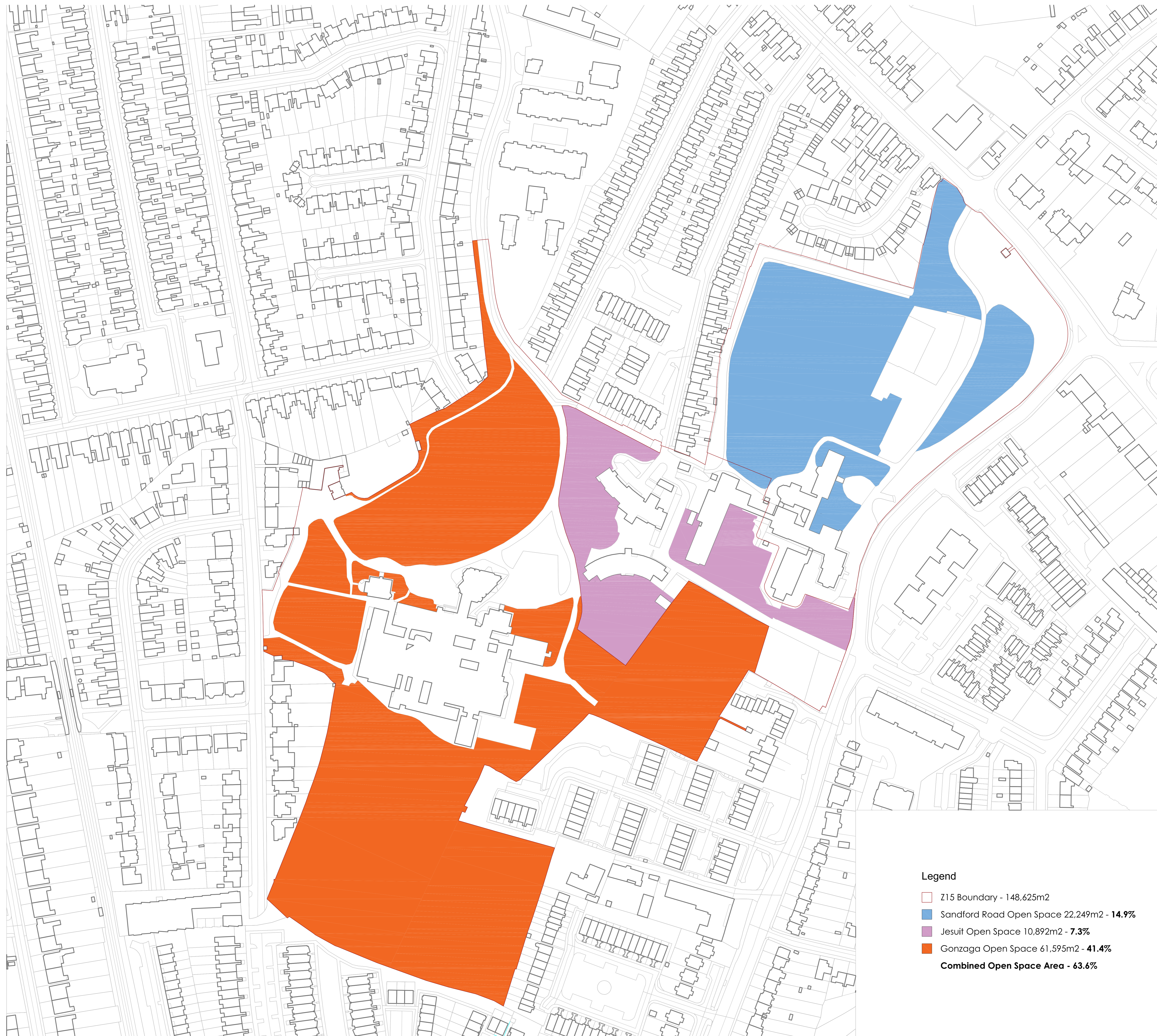
Revision Description	Date	Rev. No.	Issued by

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			Project Lead: DM	Date Printed: 27-08-2021
			Drawn By: LB	Current Rev.: 1
			Model No.: 19037-OMP-ZZ-ZZ-DR-A-1013	Purpose:

Project: Sandford Road
 Location: Milltown Park, Sandford Road, Dublin 6
 Client: Sandford Living Ltd.

Drawing Title: Site Plan - Proposed Land Use
 Drawing No.: 19037-OMP-ZZ-ZZ-DR-A-1013



Legend

- Z15 Boundary - 148,625m²
 - Sandford Road Open Space 22,249m² - **14.9%**
 - Jesuit Open Space 10,892m² - **7.3%**
 - Gonzaga Open Space 61,595m² - **41.4%**
- Combined Open Space Area - 63.6%**

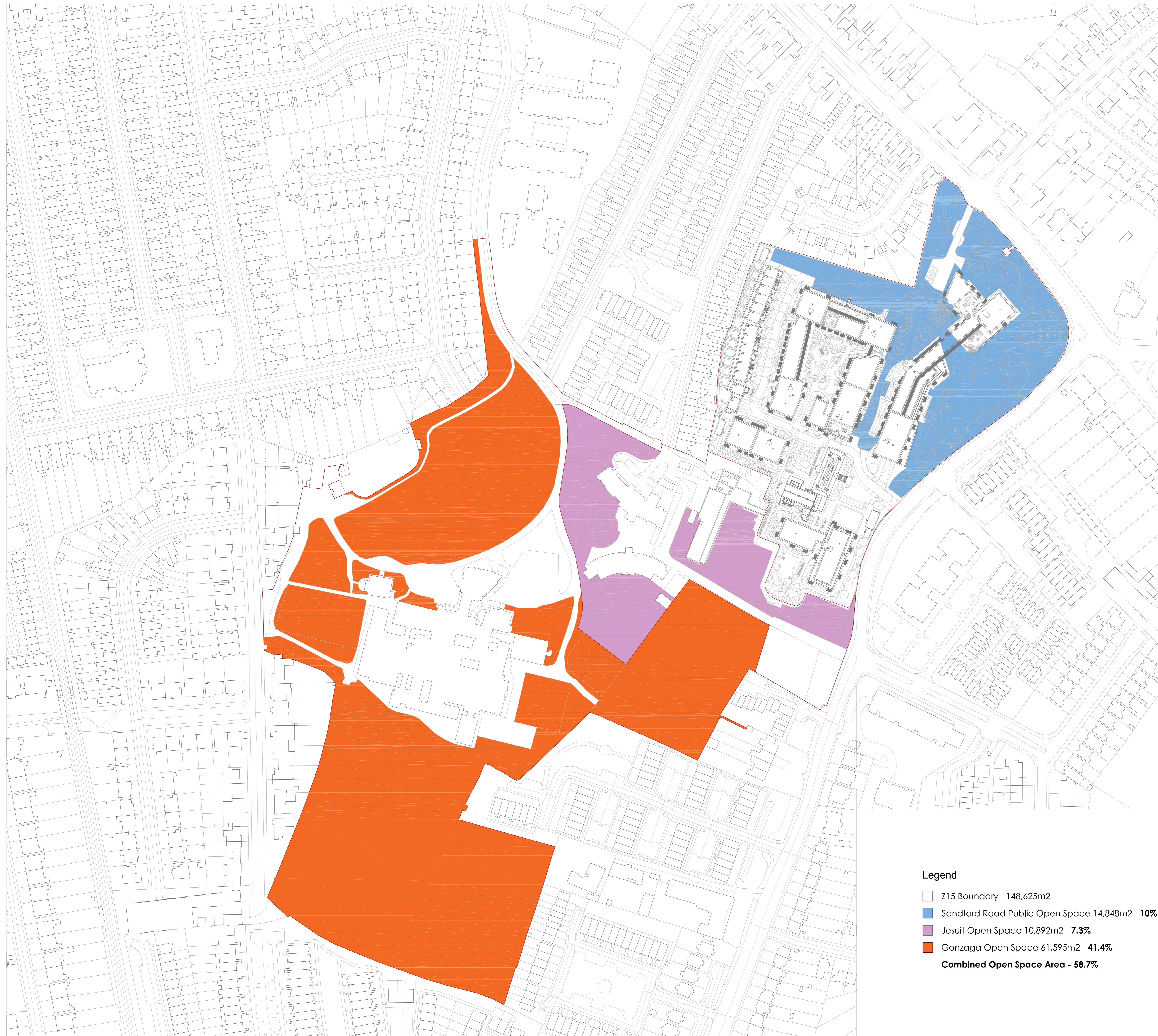
Revision Description	Date	Rev. No.	Issued by

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			Project Lead: DM	Date Printed: 27-08-2021
			Drawn By: LB	Current Rev.: 1
			Model No.: 19037-OMP-ZZ-ZZ-DR-A-1014	Purpose:

Project: Sandford Road
 Location: Milltown Park, Sandford Road, Dublin 6
 Client: Sandford Living Ltd.

Drawing Title: Site Plan - Existing Open Space
 Drawing No.: 19037-OMP-ZZ-ZZ-DR-A-1014



Legend

- Z15 Boundary - 148,625m²
 - Sandford Road Public Open Space 14,848m² - **10%**
 - Jesuit Open Space 10,892m² - **7.3%**
 - Gonzaga Open Space 61,595m² - **41.4%**
- Combined Open Space Area - 58.7%**

Revision Description	Date	Rev. No.	Issued by

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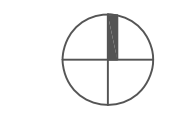
Project: Sandford Road
 Location: Milltown Park, Sandford Road, Dublin 6
 Client: Sandford Living Ltd.

Drawing Title: Site Plan - Proposed Open Space
 Drawing No.: 19037-OMP-ZZ-ZZ-DR-A-1015



Legend

- Sandford Road Space 22,249m² - **34.3%**
- Jesuits' Milltown Park Campus 10,892m² - **16.8%**
- Combined Sandford + Jesuit Application Site 64,781m²



Revision Description	Date	Rev. No.	Issued by

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			Project Lead: DM	Date Printed: 13-04-2021
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			Purpose:	

Project: Sandford Road
 Location: Milltown Park, Sandford Road, Dublin 6
 Client: Sandford Living Ltd.

Drawing Title: Site Plan - Existing Sandford + Jesuit Open Space
 Drawing No.: 19037-OMP-ZZ-DR-A-1016



Legend

- Combined Sandford + Jesuit Application Site 65,107m²
- Sandford Road Application Site 14,848m² - **22.8%**
- Jesuits' Milltown Park Campus 10,892m² - **16.7%**
- Combined Open Space 25,740m² - **39.5%**

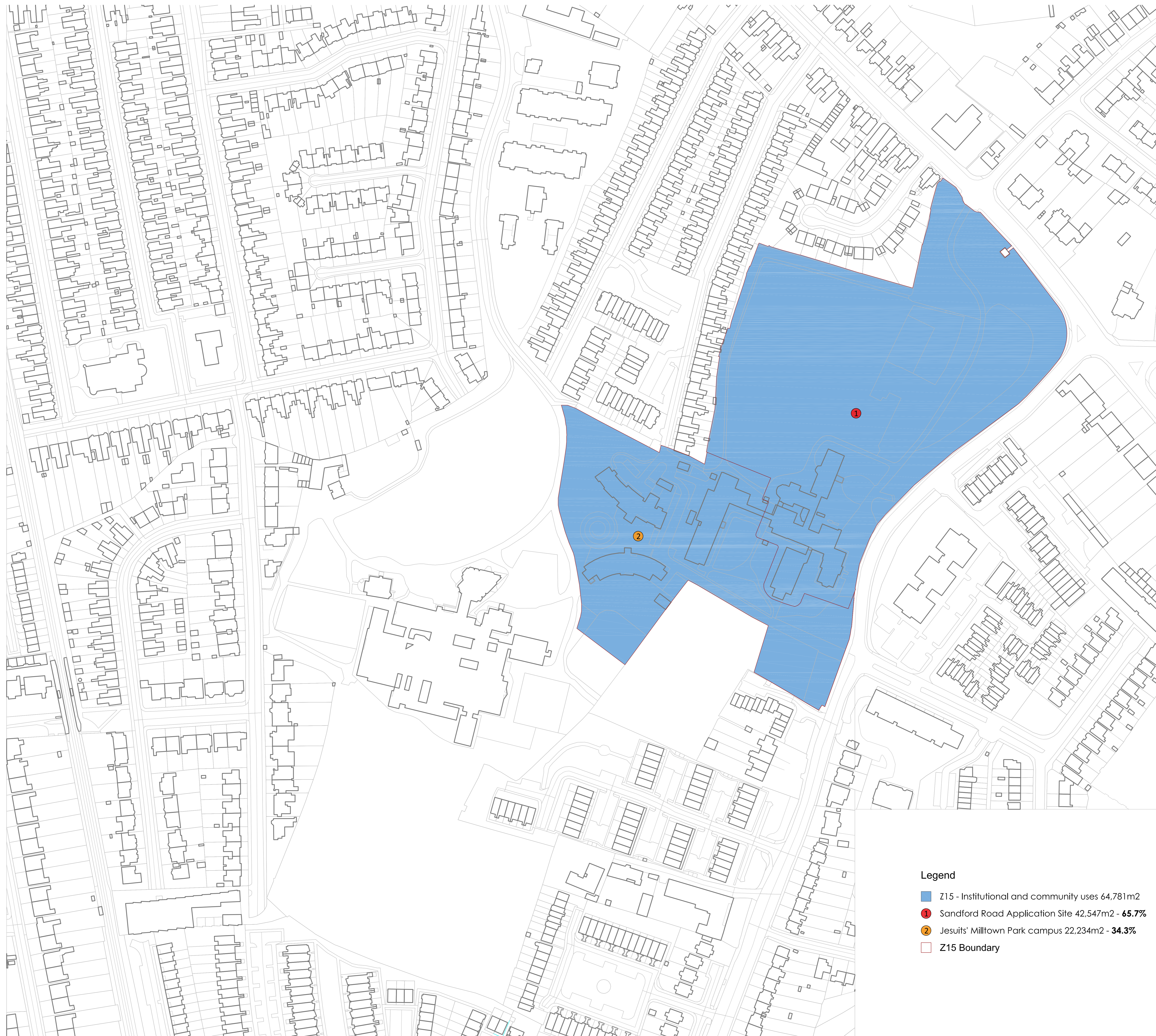
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			Project Lead: DM	Date Printed: 27-08-2021
			Drawn By: LB	Current Rev.: 1
			Model No.: 19037-OMP-ZZ-ZZ-DR-A-1017	
			Purpose:	

Project: Sandford Road
 Location: Milltown Park, Sandford Road, Dublin 6
 Client: Sandford Living Ltd.

Drawing Title: Site Plan - Proposed Sandford + Jesuit Open Space
 Drawing No.: 19037-OMP-ZZ-ZZ-DR-A-1017



Legend

- Z15 - Institutional and community uses 64,781 m²
- Sandford Road Application Site 42,547 m² - **65.7%**
- Jesuits' Milltown Park campus 22,234 m² - **34.3%**
- Z15 Boundary

Revision Description	Date	Rev. No.	Issued by

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			Project Lead: DM	Date Printed: 27-08-2021
		Drawn By: LB	Current Rev.: 1	
		Model No.: 19037-OMP-ZZ-DR-A-1018		
		Purpose:		

Project: Sandford Road
 Location: Milltown Park, Sandford Road, Dublin 6
 Client: Sandford Living Ltd.

Drawing Title: Site Plan - Existing Sandford + Jesuit Z15 Zoning Land
 Drawing No.: 19037-OMP-ZZ-DR-A-1018

