



THORNTON O'CONNOR  
TOWN PLANNING

Volume II – EIAR

**Volume II**

**Environmental Impact Assessment Report**

In respect of a Residential Development at

Milltown Park, Sandford Road, Dublin 6

Submitted on Behalf of  
Sandford Living Limited

September 2021

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## 1.0 INTRODUCTION

### 1.1 Application Details

This chapter was prepared by Patricia Thornton (BSc. Surv) (MRUP). Patricia is a Director of Thornton O'Connor Town Planning, is a Corporate member of the Irish Planning Institute and has 18 No. years post-qualification experience. Patricia has experience in preparing and coordinating EIARs for a variety of projects and has also been involved in the coordination of a wide range of developments including residential and commercial developments.

This Environmental Impact Assessment Report (EIAR) has been prepared on behalf of Sandford Living Limited (the Applicant) in relation to a Strategic Housing Development planning application at Milltown Park, Sandford Road, Dublin 6, Do6 V9K7. This application principally relates to the demolition of c. 4,883.9 sq m of existing structures on site, the refurbishment and reuse of Tabor House (1,556 sq m) and the Chapel (768 sq m) and the provision of a residential scheme comprising 671 No. residential units with residential support facilities and amenities, in addition to a creche.

The proposed development is described as follows as per the Statutory Notices:

*'Sandford Living Limited intend to apply to An Bord Pleanála for permission for a strategic housing development at this c. 4.26 hectare site at Milltown Park, Sandford Road, Dublin 6, Do6 V9K7. Works are also proposed on Milltown Road and Sandford Road to facilitate access to the development including improvements to pedestrian facilities on an area of c. 0.16 hectares. The development's surface water drainage network shall discharge from the site via a proposed 300mm diameter pipe along Milltown Road through the junction of Milltown Road / Sandford Road prior to outfalling to the existing drainage network on Eglinton Road (approximately 200 metres from the Sandford Road / Eglinton Road junction), with these works incorporating an area of c. 0.32 hectares. The development site area, road works and drainage works areas will provide a total application site area of c. 4.74 hectares.*

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

*Block A1 will range in height from part 5 No. storeys to part 10 No. storeys and will comprise 94 No. Build-to-Rent apartments; Block A2 will range in height from part 6 No. storeys to part 8 No. storeys (including part double height at ground floor level) and will comprise 140 No. Build-to-Rent apartments and duplex units; Block B will range in height from part 3 No. to part 7 No. storeys and will comprise 91 No. Build-to-Rent apartments;*

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

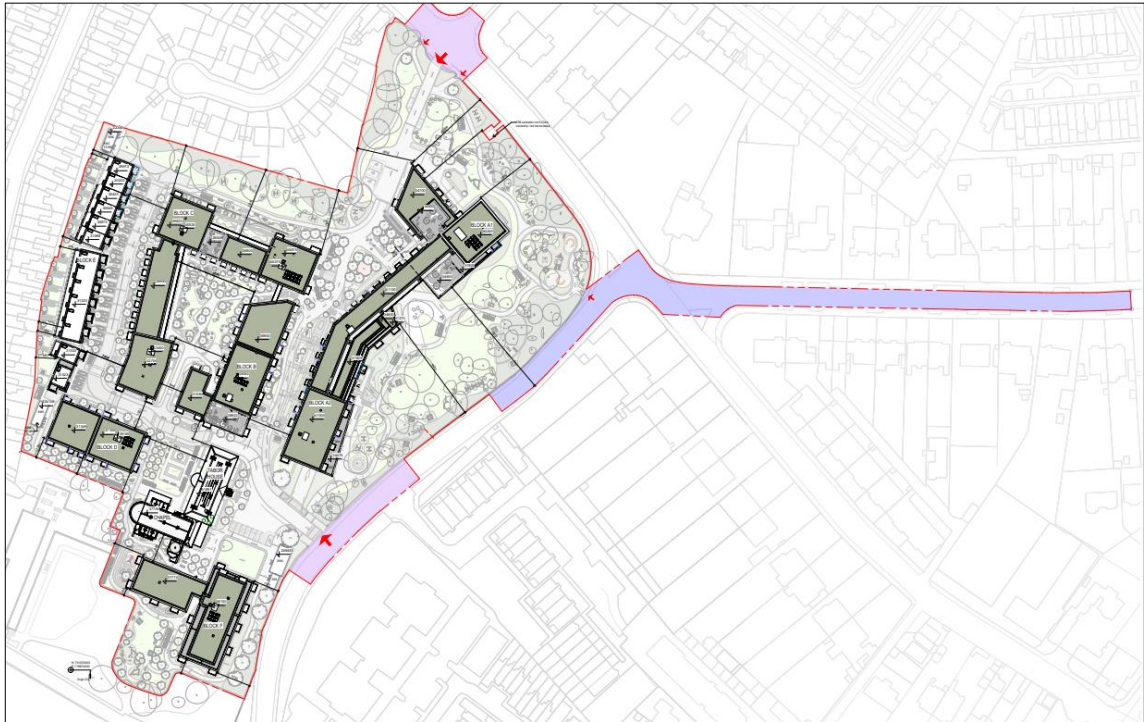
*The development also includes a creche within Block F (400 sq m) with outdoor play area; and the provision of communal internal amenities (c. 1,248.8 sq m) and facilities (c. 158.3 sq m) throughout the residential blocks, Tabor House and the converted Chapel building including co-working space, gym,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

*The proposed works also include a new 2.4 metre high boundary wall across the site from east to west (towards the southern boundary) requiring the demolition of a portion of the red brick link building that lies within the subject site towards the south-western boundary (36.4 sq m) and the making good of the façade at the boundary. The existing Link Building is the subject of a separate application for permission (DCC Reg. Ref. No. 3866/20) that includes a request for permission to demolish that Link Building, including the part of the building on the lands the subject of this application for SHD permission. If that application is granted and first implemented, no demolition works to the Link Building will be required under this application for SHD permission. If that application is refused permission or not first implemented, permission is here sought to demolish only that part of the Link Building now existing on the lands the subject of this application for permission and to make good the balance at the red line with a blank wall.*

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

A fully detailed description of the project is set out in Chapter 3 of this EIAR. In addition, a Non-Technical Summary of the EIAR is provided in Volume 1 and relevant Appendices are provided in Volume 3.





**Figure 1.1: Site Plan of the Proposed Development**

**(Source: OMP Architects, 2021)**

## 1.2 Requirement to Prepare an EIAR

The Environmental Impact Assessment (EIA) requirements for certain developments derive from EU Directives. Directive 2011/92/EU as amended by Directive 2014/52/EU amended (the "EIA Directive") imposes requirements to assess the effects of certain projects on the environment. To assist with such assessments, the EIA Directive requires that an Environmental Impact Assessment Report ("EIAR") is prepared for certain projects. The EIAR was introduced by Directive 2014/52/EU and replaces the Environmental Impact Statement ("EIS") required under Directive 2011/92/EU.

The European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 have now transposed the 2014 Directive into Irish law.

Article 3 (1) of the amended Directive outlines that:

*'The environmental impact assessment shall identify, describe and assess in an appropriate manner, in the light of each individual case, the direct and indirect significant effects of a project on the following factors:*

- a) *Population and human health;*
- b) *Biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC*
- c) *land, soil, water, air and climate;*
- d) *material assets, cultural heritage and the landscape;*
- e) *the interaction between the factors referred to in points (a) to (d).'*

The EIAR process is illustrated at Figure 1.2 below:

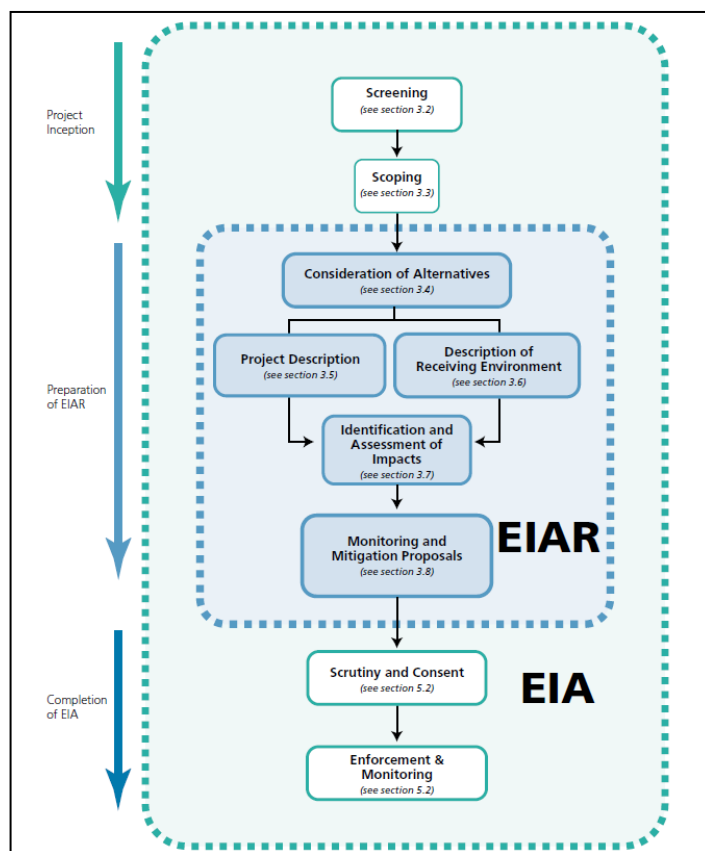


Figure 1.2: Diagram illustrating the Process of Carrying Out an EIAR

(Source: EPA Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, Draft August 2017)

As detailed in Figure 1.1 above, the following are the key stages of the EIAR process:

- Screening – Does an EIAR need to be prepared?
- Scoping – Relevant environmental aspects to be considered in the assessment
- Preparing the EIAR Document
- Completion of EIAR and any enforcement of mitigation measures or monitoring etc.

### 1.3 Requirement to Prepare this EIAR

The preparation of an EIAR is required for the subject proposed development as the scheme falls within the remit of those listed in Schedule 5 (Part 2) of the *Planning and Development Regulations, 2001* (as amended), which sets out the relevant thresholds which require the carrying out of an EIAR. The subject development falls within the threshold of Category 10 (b)(i) as it comprises the 'construction of more than 500 dwelling units'.

The EIAR has also been prepared having due regard to the Environmental Protection Agency's *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, Draft August 2017* which sets out that:

*'A systematic approach, standard descriptive methods and the use of replicable assessment techniques and standardised impact descriptions must be adopted to ensure that all likely significant effects are adequately considered and clearly communicated.'*

#### 1.4 Purpose of this EIAR

This EIAR has been prepared on behalf of the Applicant, Sandford Living Limited, in relation to the subject development of 671 No. units, a creche and ancillary residential support facilities and amenities. As noted above, the proposed development falls within the remit of Category 10(b)(i) Schedule 5 (Part 2) of the *Planning and Development Regulations, 2001 (as amended)*, which states that the carrying out of an EIAR is required when development comprises the *'construction of more than 500 dwelling units'*.

The EIAR has been prepared in accordance with Article 5 (1) and Annex IV of Directive 2014/52/EU which stipulates that:

*'A description of the likely significant effect of the project on the environment resulting from, inter alia:*

- a) the construction and existence of the project, including, where relevant, demolition works;*
- b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;*
- c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;*
- d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);*
- e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;*
- f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;*
- g) the technologies and the substances uses.*

*The description of the likely significant effects on the [environmental] factors should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the project.'*

Furthermore, Annex III (3) of the amended Directive stipulates:

- a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);*
- b) the nature of the impact;*

- c) *the transboundary nature of the impact;*
- d) *the intensity and complexity of the impact;*
- e) *the probability of the impact;*
- f) *the expected onset, duration, frequency and reversibility of the impact;*
- g) *the cumulation of the impact with the impact of other existing and/or approved projects;*
- h) *the possibility of effectively reducing the impact.'*

This EIAR has been completed fully in accordance with Article 5(1) and Annex IV of Directive 2014/52/EU. This EIAR has been compiled by Thornton O'Connor Town Planning and incorporates all inputs from relevant experts as outlined in Section 1.7. The layout of the EIAR is discussed in the following section.

### **1.5 Format of this EIAR and EIAR Methodology**

This EIAR comprises 3 No. volumes as follows:

- Volume 1: Non-Technical Summary
- Volume 2: Environmental Impact Assessment Report
- Volume 3: Appendices to the Environmental Impact Assessment Report

The preparation of this EIAR has comprised the compilation and presentation of a wide range of information from a variety of consultants. Each expert has compiled the relevant chapter (details of each expert outlined at the outset of every EIAR chapter) principally set out in the following format, where relevant:

1. Existing Receiving Environment (Baseline Scenario)
2. Physical Characteristics of the Proposed Development
3. List of Relevant Environmental Factors and any Likely Impacts of the Development
4. Proposed Mitigation Measures
5. Potential Cumulative Impacts
6. Monitoring Required
7. Avoidance, Remedial or Reinstatement
8. Interactions
9. Difficulties Encountered (if any)

In addition, an Examination of Alternatives is provided in Chapter 4 and a Non-Technical Summary of each chapter is provided in Volume 1 of this EIAR.

### **1.6 The Applicant**

We confirm that our Client, Sandford Living Limited own the majority of the site (c. 4.26 Ha).

In addition, we note that a letter of consent has been received from Dublin City Council to carry out works on Milltown Road, Sandford Road and Eglinton Road (c. 0.48 Ha).

The total site area within the red line boundary will be c. 4.74 Ha.

## 1.7 The EIAR Team

This EIAR has been compiled by Thornton O'Connor Town Planning and comprises input from an experienced team of consultants. The various consultants have been provided in Table 1.1 below and their expertise will be included at the beginning of each relevant chapter. Each consultant is appropriately qualified and experienced in their respective fields in accordance with Directive 2014/52/EU.

Chapter No.	Chapter Title	Consultant	Expert
Chapter 1	Introduction	Thornton O'Connor Town Planning (TOC)	Patricia Thornton
Chapter 2	Site Location, Description and Context	TOC	Patricia Thornton
Chapter 3	Description of Development	TOC	Patricia Thornton
Chapter 4	Examination of Alternatives	TOC	Patricia Thornton
		O' Mahony Pike Architects (OMP)	Derek Murphy
		DBFL Consulting Engineers (DBFL)	Brendan Keogh
Chapter 5	Population and Human Health	TOC	Patricia Thornton
Chapter 6	Archaeological and Cultural Heritage	Archer Heritage Limited	Aidan O'Connell
Chapter 7	Architectural Heritage	Molloy and Associates	Maol Íosa Molloy
			Shelly O'Donovan
Chapter 8	Biodiversity	JBA Consulting	Patricia Byrne
			Niamh Burke
			Malin Lundburg
			Tanya Slattery
Chapter 9	Landscape and Visual Impact	Modelworks	Richard Butler
Chapter 10	Land, Soils and Geology	DBFL Consulting Engineers	Brendan Keogh
			Ross Griffin
Chapter 11	Water-Hydrology	DBFL Consulting Engineers	Brendan Keogh
			AWN Consulting
Chapter 12	Air Quality and Climate	AWN Consulting	Avril Challoner
			Niamh Nolan
Chapter 13	Noise and Vibration	AWN Consulting	Leo Williams
Chapter 14	Material Assets – Waste Management	AWN Consulting	Chonaiil Bradley
Chapter 15	Material Assets –Transportation	DBFL Consulting Engineers	Robert Kelly
			Helen Gendy

<b>Chapter 16</b>	Material Assets – Site Services	DBFL Consulting Engineers	Brendan Keogh
<b>Chapter 17</b>	Microclimate - Wind	O'Connor Cronin Engineers Sutton Consulting	Donal O'Connor Carlota Alvarez
<b>Chapter 18</b>	Risk Management	Enviroguide Consulting	Janet O' Shea
<b>Chapter 19</b>	Interactions and Cumulative Impacts	TOC/All	Collated by Patricia Thornton
<b>Chapter 20</b>	Mitigation Measures and Monitoring	TOC/All	Collated by Patricia Thornton
<b>Chapter 21</b>	Difficulties Encountered	TOC/All	Collated by Patricia Thornton

**Table 1.1: List of EIAR Consultants**

## 1.8 Terminology

The Environmental Protection Agency's *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, Draft August 2017* sets out a table of terms that can be used to consistently describe the specific effects in the EIAR. **These Guidelines note that all categories of terms do not need to be used for every effect.** Table 3.3 of these Guidelines sets out the following Description of Effects:

<p><b>Quality of Effects</b></p> <p>It is important to inform the non-specialist reader whether an effect is positive, negative or neutral</p>	<p><b>Positive Effects</b></p> <p>A change which improves the quality of the environment (for example, by increasing species diversity; or the improving reproductive capacity of an ecosystem, or by removing nuisances or improving amenities).</p>
	<p><b>Neutral Effects</b></p> <p>No effects or effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error.</p>
	<p><b>Negative/adverse Effects</b></p> <p>A change which reduces the quality of the environment (for example, lessening species diversity or diminishing the reproductive capacity of an ecosystem; or damaging health or property or by causing nuisance).</p>
<p><b>Describing the Significance of Effects</b></p> <p>'Significance' is a concept that can have different meanings for different topics – in the absence of specific definitions for different topics the following definitions may be useful (also</p>	<p><b>Imperceptible</b></p> <p>An effect capable of measurement but without significant consequences.</p>
	<p><b>Not Significant</b></p> <p>An effect which causes noticeable changes in the character of the environment but without significant consequences.</p>

see Determining Significance below.).	<p><b>Slight Effects</b></p> <p>An effect which causes noticeable changes in the character of the environment without affecting its sensitivities.</p>
	<p><b>Moderate Effects</b></p> <p>An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends.</p>
	<p><b>Significant Effects</b></p> <p>An effect which, by its character, magnitude, duration or intensity alters a sensitive aspect of the environment.</p>
	<p><b>Very Significant</b></p> <p>An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment.</p>
	<p><b>Profound Effects</b></p> <p>An effect which obliterates sensitive characteristics.</p>
<p><b>Describing the Extent and Context of Effects</b></p> <p>Context can affect the perception of significance. It is important to establish if the effect is unique or, perhaps, commonly or increasingly experienced.</p>	<p><b>Extent</b></p> <p>Describe the size of the area, the number of sites, and the proportion of a population affected by an effect.</p>
	<p><b>Context</b></p> <p>Describe whether the extent, duration, or frequency will conform or contrast with established (baseline) conditions (is it the biggest, longest effect ever?)</p>
<p><b>Describing the Probability of Effects</b></p> <p>Descriptions of effects should establish how likely it is that the predicted effects will occur – so that the CA can take a view of the balance of risk over advantage when making a decision.</p>	<p><b>Likely Effects</b></p> <p>The effects that can reasonably be expected to occur because of the planned project if all mitigation measures are properly implemented.</p>
	<p><b>Unlikely Effects</b></p> <p>The effects that can reasonably be expected not to occur because of the planned project if all mitigation measures are properly implemented.</p>

<p><b>Describing the Duration and Frequency of Effects</b></p> <p>'Duration' is a concept that can have different meanings for different topics – in the absence of specific definitions for different topics the following definitions may be useful.</p>	<p><b>Momentary Effects</b> Effects lasting from seconds to minute</p>
	<p><b>Brief Effects</b> Effects lasting less than a day</p>
	<p><b>Temporary Effects</b> Effects lasting less than a year</p>
	<p><b>Short-term Effects</b> Effects lasting one to seven years</p>
	<p><b>Medium-term Effects</b> Effects lasting seven to fifteen years</p>
	<p><b>Long-term Effects</b> Effects lasting fifteen to sixty years</p>
	<p><b>Permanent Effects</b> Effects lasting over sixty years</p>
	<p><b>Reversible Effects</b> Effects that can be undone, for example through remediation or restoration</p>
	<p><b>Frequency of Effects</b> Describe how often the effect will occur. (once, rarely, occasionally, frequently, constantly – or hourly, daily, weekly, monthly, annually)</p>
<p><b>Describing the Types of Effects</b></p>	<p><b>Indirect Effects (a.k.a. Secondary Effects)</b> Impacts on the environment, which are not a direct result of the project, often produced away from the project site or because of a complex pathway.</p>
	<p><b>Cumulative Effects</b> The addition of many minor or significant effects, including effects of other projects, to create larger, more significant effects.</p>



	<p><b>Cumulative Effects</b></p> <p>The addition of many minor or significant effects, including effects of other projects, to create larger, more significant effects</p>
	<p><b>'Worst case' Effects</b></p> <p>The effects arising from a project in the case where mitigation measures substantially fail.</p>
	<p><b>Indeterminable Effects</b></p> <p>When the full consequences of a change in the environment cannot be described.</p>
	<p><b>Irreversible Effects</b></p> <p>When the character, distinctiveness, diversity or reproductive capacity of an environment is permanently lost.</p>
	<p><b>Residual Effects</b></p> <p>The degree of environmental change that will occur after the proposed mitigation measures have taken effect</p>
	<p><b>Synergistic Effects</b></p> <p>Where the resultant effect is of greater significance than the sum of its constituents, (e.g. combination of SO<sub>x</sub> and NO<sub>x</sub> to produce smog).</p>

**Table 1.2: Description of Effects (EPA, 2017)**

Figure 3.5 of the *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, Draft August 2017* provides the following diagram, which shows how comparison of the character of the predicted impact to the sensitivity of the receiving environment can determine the significance of the impact.

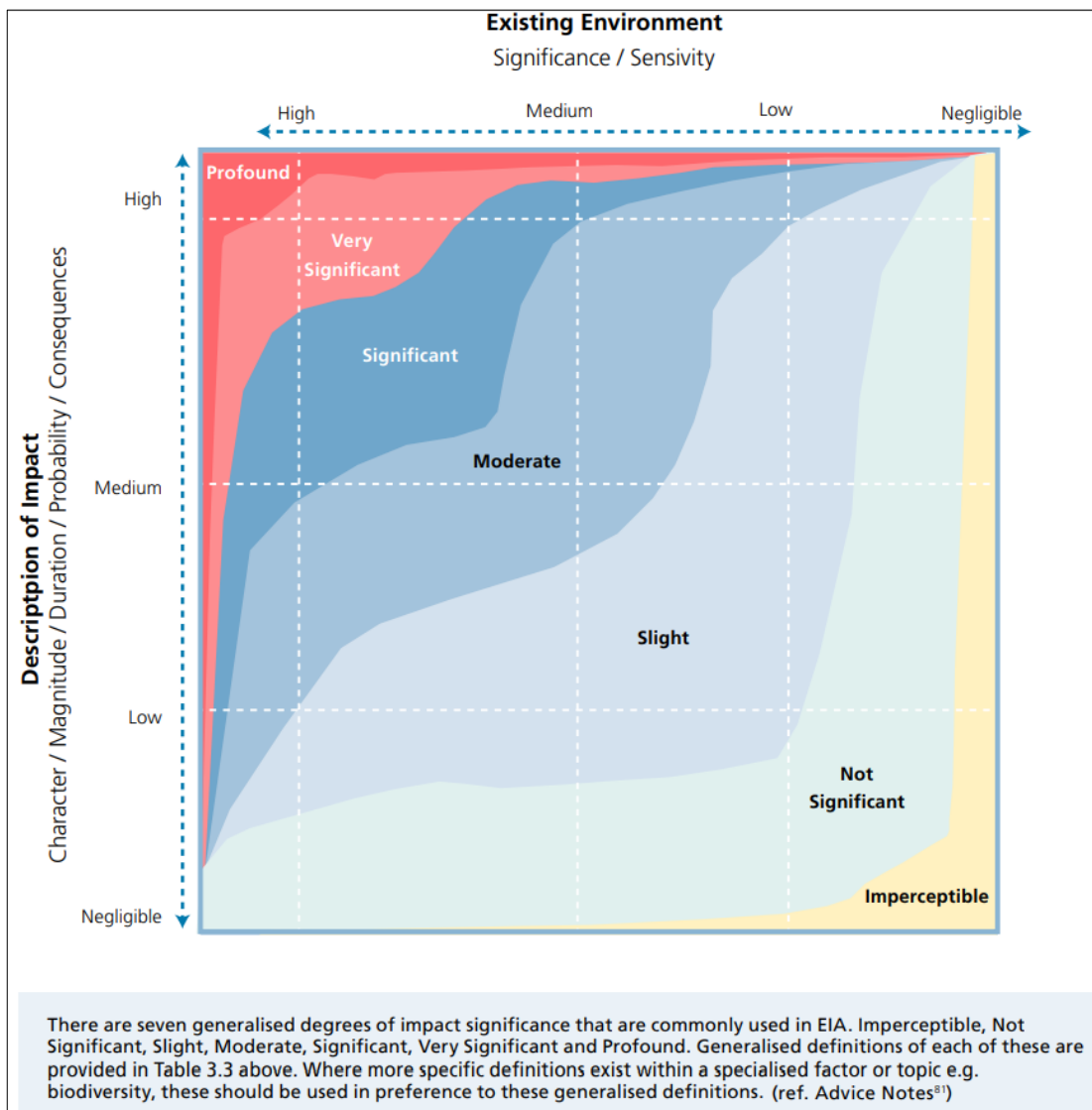


Figure 1.3: Chart showing typical classifications of the significance of impacts

(Source: EPA, 2017)

### 1.9 Quotations

The application is also accompanied by a Non-Technical Summary of the EIAR, which is laid out in a similar, but condensed format to the main EIAR. The structure, presentation, and the Non-Technical Summary of the EIAR, all facilitate the dissemination of the information contained in the EIAR. The core objective is to ensure that the public and local community are aware of the likely environmental impacts of the proposed development prior to the granting of consent.

However, it is important to acknowledge that the EIAR by its nature contains statements about the proposed development, some of which are positive and some less than positive. Selective quotation or quotations out of context can give a very misleading impression of the findings of the study. Therefore, the study team urge that quotations should, where

reasonably possible, be taken from the conclusions of specialists' sections or from the Non-Technical Summary and not selectively.

The EIA Regulations require that difficulties such as technical deficiencies, lack of information or knowledge encountered in compiling any specified information for the EIAR be described. Any difficulties encountered in the production of this EIAR are outlined in the relevant Chapters and summarised in Chapter 21.

## 2.0 SITE LOCATION, DESCRIPTION AND CONTEXT

### 2.1 Introduction

This chapter was prepared by Patricia Thornton (BSc. Surv) (MRUP). Patricia is a Director of Thornton O'Connor Town Planning, is a Corporate member of the Irish Planning Institute and has 18 No. years post-qualification experience. Patricia has experience in preparing and coordinating EIARs for a variety of projects and has also been involved in the coordination of a wide range of developments including residential and commercial developments.

### 2.2 Existing Site Details

#### 2.2.1 Location and Description of the Subject Lands

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

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

The developable lands are located at the corner of Sandford Road and Milltown Road, Dublin 6. The subject site is bounded to the north by Norwood Park and Sandford Road, to the east by Milltown Road, to the south by a carpark associated with the Milltown Park Institutional and Community premises (buildings retained by the Jesuits after the disposal of the 'developable lands') and to the west by 2 No. storey existing residential dwellings located on Cherryfield Avenue Upper and Lower.



Figure 2.1: Aerial View of Subject Site, Indicative Application Site Boundary in Red

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

The subject site is irregular in shape and has a generally flat topography. The current building range at the subject site comprises the original Milltown Park House building with 5 No. extensions attached to the original structure in addition to a red brick link building which leads to the remaining Jesuit lands. The buildings are positioned in the south-eastern corner of the subject site which formed part of the Jesuit Campus at Milltown Park which is no longer in use at the site (letter confirming that the lands are no longer required by the Jesuit Community is extracted below in Figure 2.2). The remainder of the subject site is largely undeveloped.

Steve Cassidy  
Managing Director  
Ardstone Homes  
48 Fitzwilliam Square  
Dublin 2  
D02 EF89

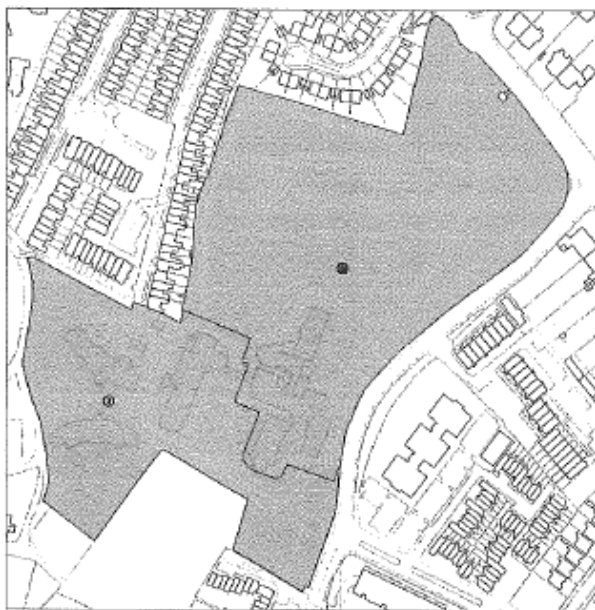
12<sup>th</sup> August 2021

Re: Former Jesuit Property at Sandford Road, Milltown Park, Dublin 6

Dear Mr. Cassidy,

I can confirm that the former Jesuit Community property at Sandford Road, which has now been purchased by Ardstone Homes ("Sandford Living Limited"), and which is the area numbered 1 on the map below, ("the subject property") is no longer required by the Society for the purposes of its functions and mission.

The subject property which formed part of the Jesuit Milltown Park campus includes the original period buildings and adjoining lands. The Society is retaining its modern residential and administration accommodation to the south of the application lands with separate access from Milltown Road and which are numbered 2.



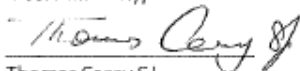
The Jesuits originally purchased the entire Milltown Park campus in the 1850's and subsequently adapted and extended the original period residence to provide a novitiate followed by Schools of Philosophy and Theology and later a community chapel, theatre and library. For more than 160 years the role of the Milltown Park community has been the formation of Jesuits, and, since the 1960s, a dozen other religious congregations in Theological and Pastoral Ministry. Since the 1960s these studies were expanded to include the education of lay people as part of a move towards greater lay involvement in Church Ministry. Both these areas have experienced a dramatic decline and falling vocations leading the Society to close these facilities and seek other options for training of priests. In tandem with other Religious Orders across Ireland, the Jesuit Community has experienced a significant decline in vocations which is impacting on the scale of accommodation required. Over the

last number of years, the Community has been considering how best to maximise the use of its property, staff and resources for the future at Milltown Park.

With the departure of the clerical students, the older Milltown buildings and adjoining land became surplus to requirements and impossible to maintain by the Community and these buildings are now vacant and not in use. In the meantime, the Jesuits developed modern residential and administration accommodation to the rear including Milltown Park community house and Cherryfield Lodge nursing home, which are being retained by the Jesuit Community, thus leaving the subject property redundant and leading to its sale. Prior to disposing of the subject property, we considered our future requirements thoroughly and we can confirm that the lands that we have retained are entirely adequate for our future needs.

I can also confirm that throughout the Society's ownership of the Milltown Park Campus, the subject property and the retained property were not available for public use and that access to the site was strictly managed and controlled by restricted opening of the gates at Sandford Road and Milltown Road.

Yours sincerely,



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

**Figure 2.2: Letter Received from the Jesuit Community dated 12<sup>th</sup> August 2021**

Up until 2019, the existing buildings and lands at the application site were formally utilised by the Jesuit Community for institutional purposes. The institutional operations principally involved the formation and education 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 on the site and thus, the operations ceased permanently in 2015 and the property was vacated by the Jesuit order in 2019.

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

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

As noted above, the existing building range is located in the south-eastern corner of the subject site and ranges in height from 2 No. to 4 No. storeys. The outline of each building element is presented in Figure 2.3 below and detailed descriptions of each building are discussed in Chapter 7 of this EIAR (Architectural Heritage) which has been prepared by Molloy and Associates Conservation Architects. We note that Tabor House and The Chapel will be reused and refurbished as part of the proposed development.



**Figure 2.3:** Outline of Building Range Which Identifies Each Building Element Existing at the Subject Lands

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

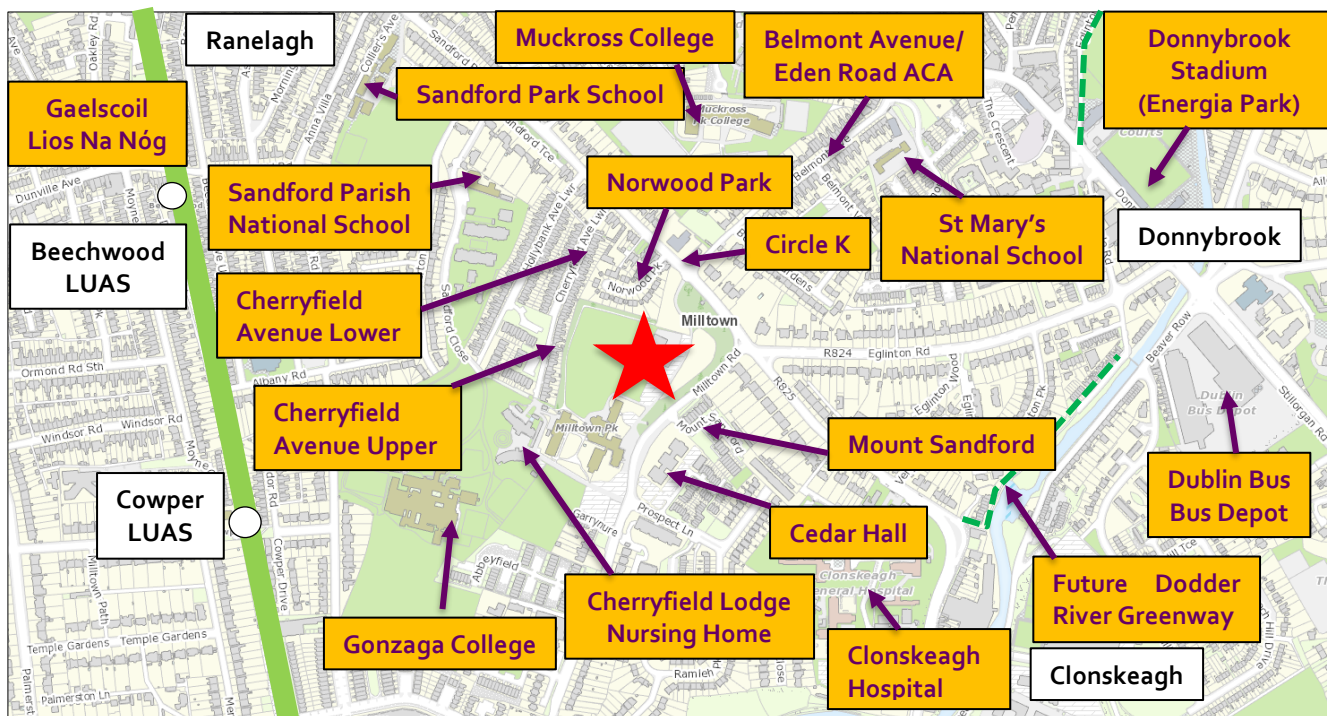
### 2.2.2 Site Context

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

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

The institutional uses are located adjacent to the south-west of the subject site and comprise Gonzaga College and the Cherryfield Lodge Nursing Home. Muckcross Park College is located to the north-west of the subject lands and a Circle K Petrol Station is located to the north of the subject lands along Sandford Road.





**Figure 2.4:** Context Surrounding the Subject Site (Highlighted Indicatively by the Red Star)

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

### 2.2.2.1 Nearby Neighbourhood Centres

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

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

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

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

Services/Facilities include: Donnybrook Fair, Donnybrook Lawn Tennis Club, Tesco Express, Lloyds Pharmacy, Boots Pharmacy, Spar Donnybrook, Energia Park (Donnybrook Stadium), Beactive Rangers Football Club, Be Active Lawn Tennis Club, Lyk Nu Cleaners, AIB Bank, 115 Medical (Doctor), D4 Medical Centre, The Grafton Barber, Donnybrook Dental Practice, 93 Hairdressing, Mary Moore Podiatry/Chiropody, Brens Barber Shop, Donnybrook Foot Mechanics, Skin by Olga, Di Milo Hair Design, Mink Hand & Foot Spa, Donnybrook Bikes, O'Brien's Off Licence, Fast Fit (Car Repair and Maintenance), First Stop Garage, Donnybrook



Parish-Church of the Sacred Heart, Insomnia Café, McCloskey's Bar, Café Java, Green Beards Café, Nourish Donnybrook Health Food Store, Marco Pierre White Courtyard Bar and Grill, the Donnybrook Gastropub, Mulberry Garden Restaurant, Romayo's Donnybrook Fish and Chips, Abrakebabra, Eddie Rockets, Arthur Mayne's Bar, Black Pepper Indian Restaurant, Café Nero, Mao at Home Restaurant, Le Comptoir and Café Diem for example;

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

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

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

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

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

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

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

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

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

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

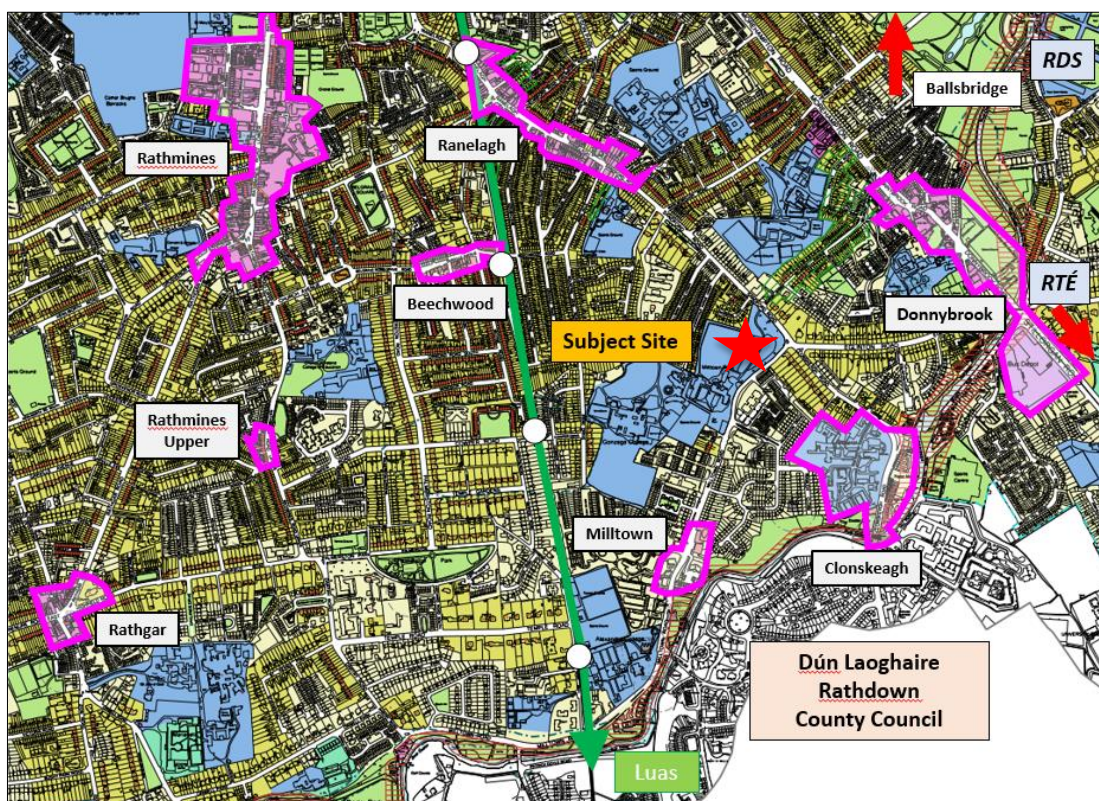


Figure 2.5: Neighbourhood and District Centres in the Surrounding Area

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

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

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

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

The *Social Infrastructure Audit* notes that:

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

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

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

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

- **181 No. Health Services and Facilities**  
(6 No. hospitals, 20 No. medical centres, 48 No. GP practices, 23 No. dental practices, 20 No. counselling/therapy services, 13 No. physiotherapist services, 8 No. nursing homes, 7 No. specialist/ health specialist and 36 No. pharmacies)
- **40 No. Community Services and Facilities**  
(7 No. Credit Unions, 6 No. Post Offices, 15 No. Community Centres and 12 No. Libraries)
- **72 No. Sports and Recreation Facilities**  
(49 No. Sports Clubs, 10 No. Gym/Health Centre and 13 No. Parks)
- **23 No. Faith Facilities**  
(22 No. Faith Facilities and 1 No. Cemetery)
- **3 No. Emergency Related Facilities**  
(1 No. Fire Station and 2 No. Garda Station)

The Social Infrastructure Audit concludes the following:

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

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



## 2.3 Accessibility of the Subject Site

### 2.3.1 LUAS Green Line

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

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



**Figure 2.6: Beechwood Luas Stop Located 1 km/c. 13 minutes Walking Distance from the Subject Site**

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

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

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

The proposed MetroLink service as a segregated and mostly underground/ sub-surface system will be a fully automatic service which will greatly improve frequencies across the

wider network and provide new improved connection to the city centre, the airport and Dublin's rail network.

### 2.3.2 Existing Bus Services

The following bus services serve the area in proximity to the subject site which further demonstrate the highly accessible location of the subject site:

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

	Street – City Centre - Stoneybatter, Old Cabra Road, Navan Road, Connolly Hospital, Blanchardstown Shopping Centre, Huntstown, Ongar					
<b>No. 145</b>	<b>Stop No. 775</b> Morehampton Road, Burlington Road, Leeson Street, Dawson Street, Leinster Street South, Pearse Street, Westmoreland Street, Essex Street, Merchant's Quay, Usher's Quay, Victoria Quay, Guinness Storehouse, Heuston Station	<b>c. 600 metres (c. 7 minute walk)</b>	<b>Stop No. 758</b> Stillorgan Road, UCD, Stillorgan, Foxrock, Cornelscourt, Cabinteely, Loughlinstown, Shankill, Bray and Southern Cross Retail Park.	<b>c. 550 metres (c. 7 minute walk)</b>	10 Minutes	20 Minutes
<b>No. 155</b>	<b>Stop No. 775</b> Morehampton Road, Burlington Road, Leeson Street, Dawson Street, Westmoreland Street, O'Connell Street,	<b>c. 600 metres (c. 7 minute walk)</b>	<b>Stop No. 758</b> Stillorgan Road, UCD, Stillorgan, Foxrock, Cornelscourt, Cabinteely, Loughlinstown, Shankill and Bray DART Station.	<b>c. 550 metres (c. 7 minute walk)</b>	20 Minutes	20 Minutes

	Phibsboro Road, Constitution Hill, Broadstone Depot, Phibsboro Shopping Centre, Mobhi Road, Botanic Road, Griffith Avenue, Glasnevin Tennis Club, DCU, Gulliver's Retail Park and IKEA (Ballymun)					
<b>No. 44</b>	<b>Stop No. 884</b> Ranelagh, Charlemont Street, Earlsfort Terrace, Leeson Street, Dawson Street, Westland Row, Pearse Station, Westmoreland Street, O'Connell Street, Parnell Street, Rotunda Hospital, Dorset Street, Drumcondra Station, Drumcondra Road, DCU Saint Patrick's Campus, Home Farm Road, Swords Road, Collins Avenue,	<b>c. 80 metres (c. 1 minute walk)</b>	<b>Stop No. 855</b> Milltown, Dundrum Road, Bird Avenue, Dundrum Retail Park, Dundrum Hospital, Dundrum Luas, Dundrum Village, Dundrum Shopping Centre, Balally, Sandyford Road, Kilgobbin Heights, Ballyogan Road, Belarmine, Stepside, Enniskerry Road, Kilternan, The Scalp Wood and Enniskerry.	<b>Directly Opposite the Site on Sandford Road</b>	Hourly	Hourly



	Whitehall, DCU and The Helix					
<b>No. 46A</b>	<b>Stop No. 775</b>  Morehampton Road, Burlington Road, Leeson Street, Dawson Street, Westmoreland Street, O'Connell Street, Mountjoy Street, Mater Hospital, North Circular Road, Phoenix Park	<b>c. 600 metres (c. 7 minute walk)</b>	<b>Stop No. 758</b>  Stillorgan Road, Foxrock, Kill of the Grange, IADT, Mountown Road Lower and Dún Laoghaire DART station.	<b>c. 550 metres (c. 7 minute walk)</b>	7-10 Minutes	15 Minutes
<b>No. 61</b>	<b>Stop No. 884</b>  Ranelagh, Charlemont, Charlemont Street, Earlsfort Terrace, Leeson Street, Dawson Street, Westland Row, Pearse Station, Trinity College, Eden Quay, Marlborough Street	<b>c. 80 metres (c. 1 minute walk)</b>	<b>Stop No. 855</b>  Milltown, Dundrum Road, Bird Avenue, Dundrum Hospital, Dundrum Retail Park, Churchtown, Nutgrove Avenue, Nutgrove Shopping Centre, Willbrook Road, Taylors Lane, Ballyboden and Edmonstown.	<b>Directly Opposite the Site on Sandford Road</b>	Hourly	Hourly/75 Minutes
<b>Operated by Go-Ahead Bus</b>						
<b>No. 18</b>	<b>Stop No. 2791</b>  Rathmines, Kenilworth Square, Kimmage,	<b>1 km (13 minute walk)</b>	<b>Stop No. 416</b>  Baggot Street, Pembroke Road Ballsbridge, Sandymount	<b>1.6 km (20 minute walk)</b>	15-20 Minutes	20 Minutes

	Crumlin, Crumlin Childrens Hospital, Kylemore (Luas), Ballyfermot and Palmerstown		(DART), Sandymount Green.			
<b>Operated by Aircoach</b>						
<b>No. 700 (AirCoach)</b>	<b>Stop No. 773</b> Leeson Street Bridge, Saint Stephens Green, Nassau Street, Westmoreland Street, O'Connell Street, Drumcondra (Quinn's Pub) and Dublin Airport	<b>c. 700 metres (c. 9 minute walk)</b>	<b>Stop No. 759</b> Stillorgan Village, Sandyford Luas Stop and Clayton Hotel Leopardstown	<b>c. 750 metres (c. 9 minute walk)</b>	30 Minutes	30 Minutes

The site's accessible location in close proximity to Luas Green Line stops and Dublin Bus stops ensures that a wide range of business districts and employment locations are easily accessible from the site.

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

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

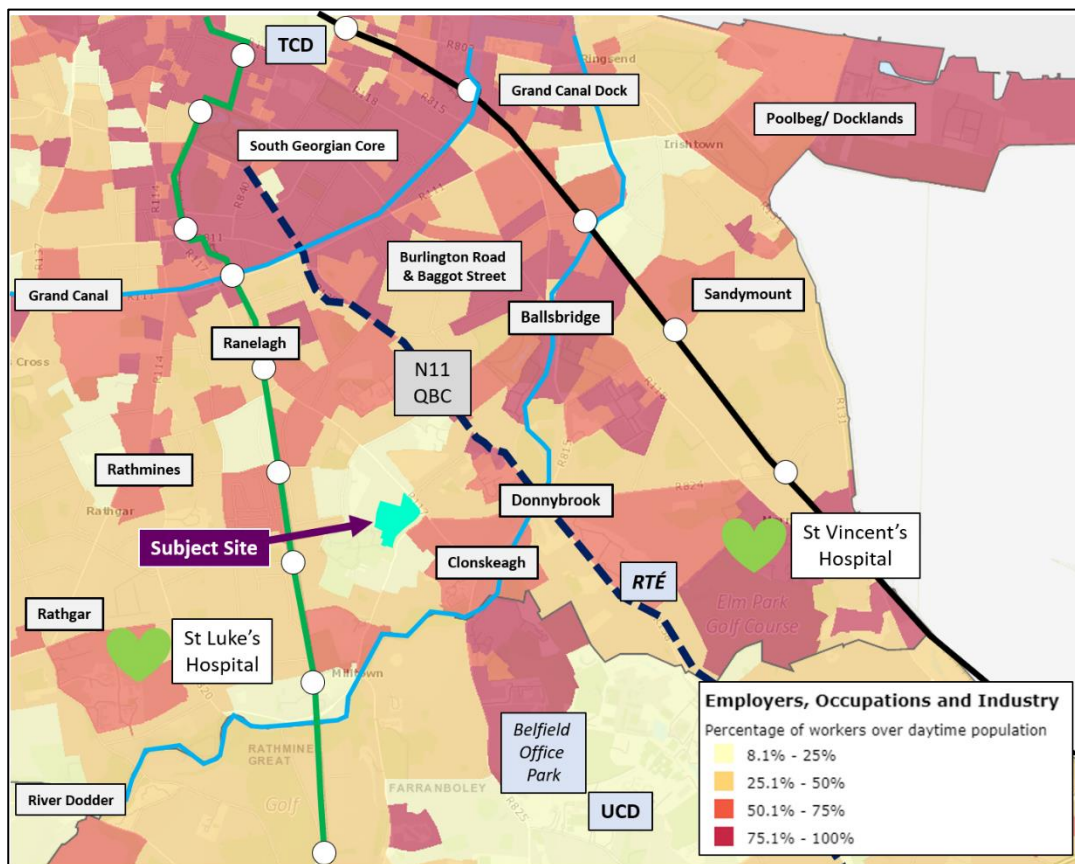


Figure 2.7: Employment Concentration Map with Site Indicatively Annotated in Blue

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

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

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

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

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

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

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

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

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

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

In addition, the nearby University College Dublin is one of the largest Universities in the state, with c. 27,000 No. students (as of 2016/17)<sup>1</sup>. There is also a workforce of c. 3,300 No. teaching and support staff within the overall college. The UCD Belfield campus spans an area of 133 No. hectares and a number of bus routes pass on either side of the campus. The No. 11 bus route can be utilised from the subject site to easily access the UCD campus. UCD is also located c. 7 No. minutes cycling distance and c. 21 minutes walking distance from the subject site.

<sup>1</sup> <https://hea.ie/assets/uploads/2019/10/Institutional-Profiles-2016-17.pdf>

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

In summary, the subject site is well located between a number of important neighbourhood centres at a key crossroads in the inner southern suburbs of Dublin City. The Green Line Luas also afford the opportunity for residents to access employment locations throughout Dublin. Additional connectivity through the surrounding area is provided by local link roads and the River Dodder which is earmarked for upgrade to a high-quality greenway. The surrounding bus coverage features a number of high-frequency routes into the City Centre and to the Docklands, Ballsbridge and the Sandyford Business District for example.

The proposed Bus Connects programme of investment will see an increase in frequency and capacity surrounding the subject site.

### 2.3.5 Cycling Infrastructure

The River Dodder is located c. 500 metres from the subject site. Although proposed as part of the NTA *Cycle Network Plan 2013*, progress on upgrading the existing paths and connections into the greenway has taken some time with early phases and flood relief works from Ringsend to Ballsbridge providing some improved linkages in recent years.

The connections from Herbert Park to the Orwell Road have been subject to recent (2018) joint consultation between Dublin City Council and Dún Laoghaire-Rathdown County Council. Government and Dublin City funding for the completion of this project has been agreed upon and further progress was expected by 2020<sup>2</sup> (currently no update).

Additionally, components and connections of the greenway are scheduled to connect to the existing cycle network and the Core Bus Corridors under Bus Connects.

### 2.3.6 Summary of the Accessibility of the Subject Site

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

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

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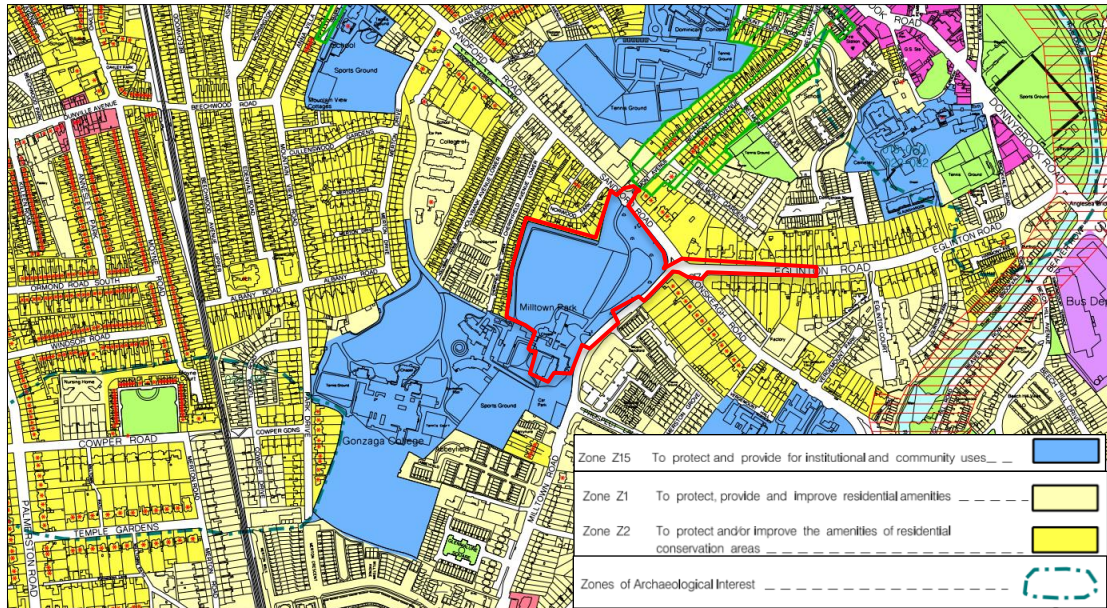
<sup>2</sup><https://www.irishtimes.com/news/environment/plans-for-river-dodder-greenway-to-be-revealed-1.3889665>



the site is well serviced and is suitably located to provide the proposed residential development.

#### 2.4 Zoning of the Subject Lands

The subject site is zoned Z15 'Institutional and Community' in the *Dublin City Council Development Plan 2016-2022* where the stated aim is 'to protect and provide for institutional and community uses'.



**Figure 2.8:** Extract from Map H Demonstrating the Z15 Zoning of the Subject Site (Indicatively Outlined in Red)

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

Please see the image below in Figure 2.9 prepared by O' Mahony Pike Architects, which highlights the land uses across the entirety of the Z15 lands.



**Figure 2.9: Image Demonstrating the Land Uses of the Entire Z15 Land Zoning at the Subject Location**

(Source: O' Mahony Pike Architects, 2021)

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

### 1. Application Site

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

### 2. Milltown Park Campus (Retained Jesuit Lands)

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

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

### 3. Gonzaga College

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

The development site and the remaining Jesuit lands are linked at a single point of connection, in the form of the red brick link building. The development site is separated from Gonzaga school physically and functionally. Therefore, the tenuous relationship between the development site and the school lands will be unaffected by the severance of links between the two.

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

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

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

*'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.

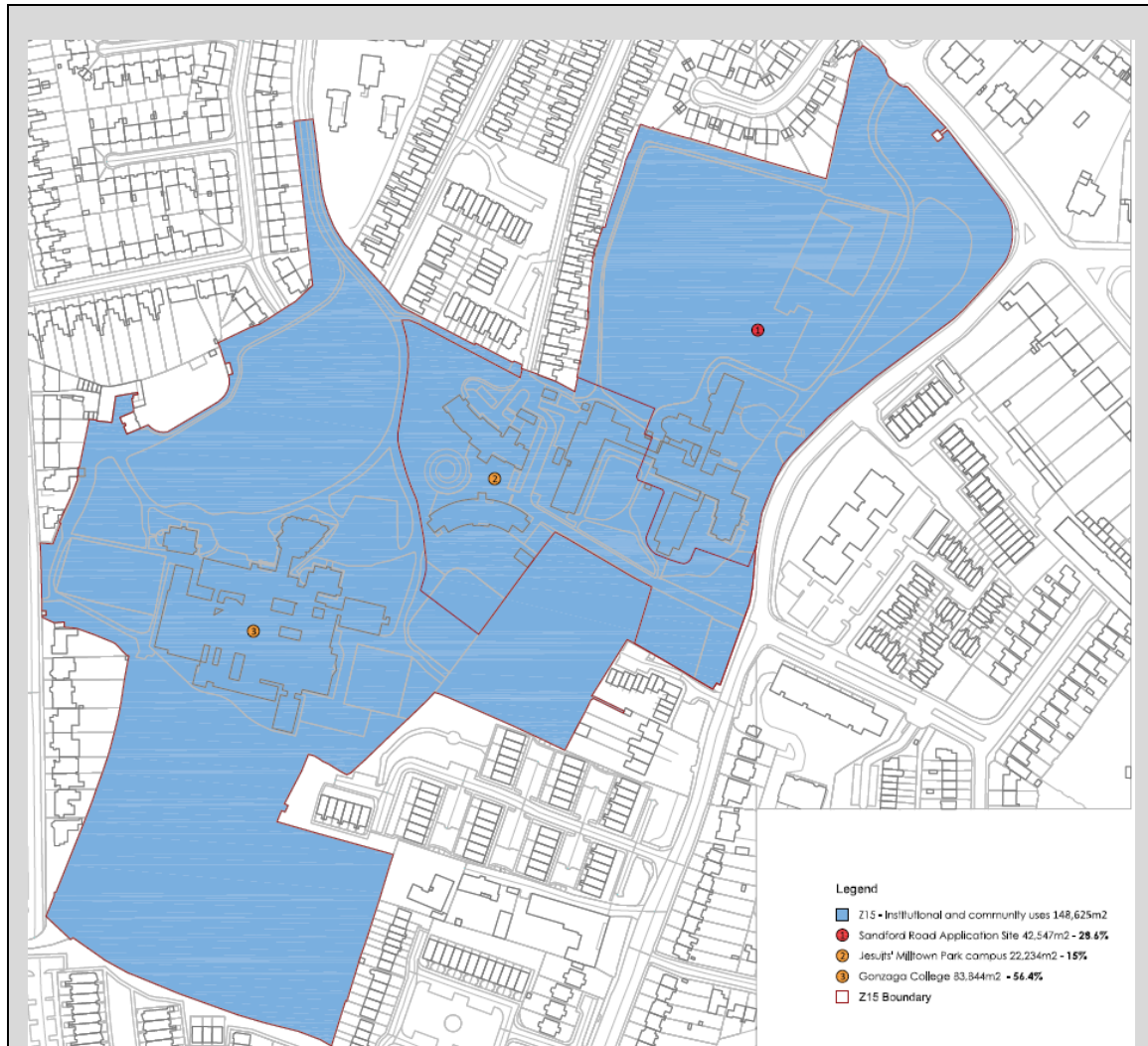
Since 2019, the subject lands are no longer in active use by the Jesuit order. However, in light of the continuing zoning objective and need for development on the lands to comply with the requirements in relation to Z15 zoning, notwithstanding the lands are no longer in active use, we have provided 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 2.10: 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 2.10. 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 2.11 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 community<sup>3</sup> (details on extent and layout of public open space provided in this section below).



**Figure 2.11: 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*

<sup>3</sup> Please note that any reference to open space in this section excludes the provision of communal open space on the application lands.



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

(Source: 3D Design Bureau, 2021)



**Figure 2.13: 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**

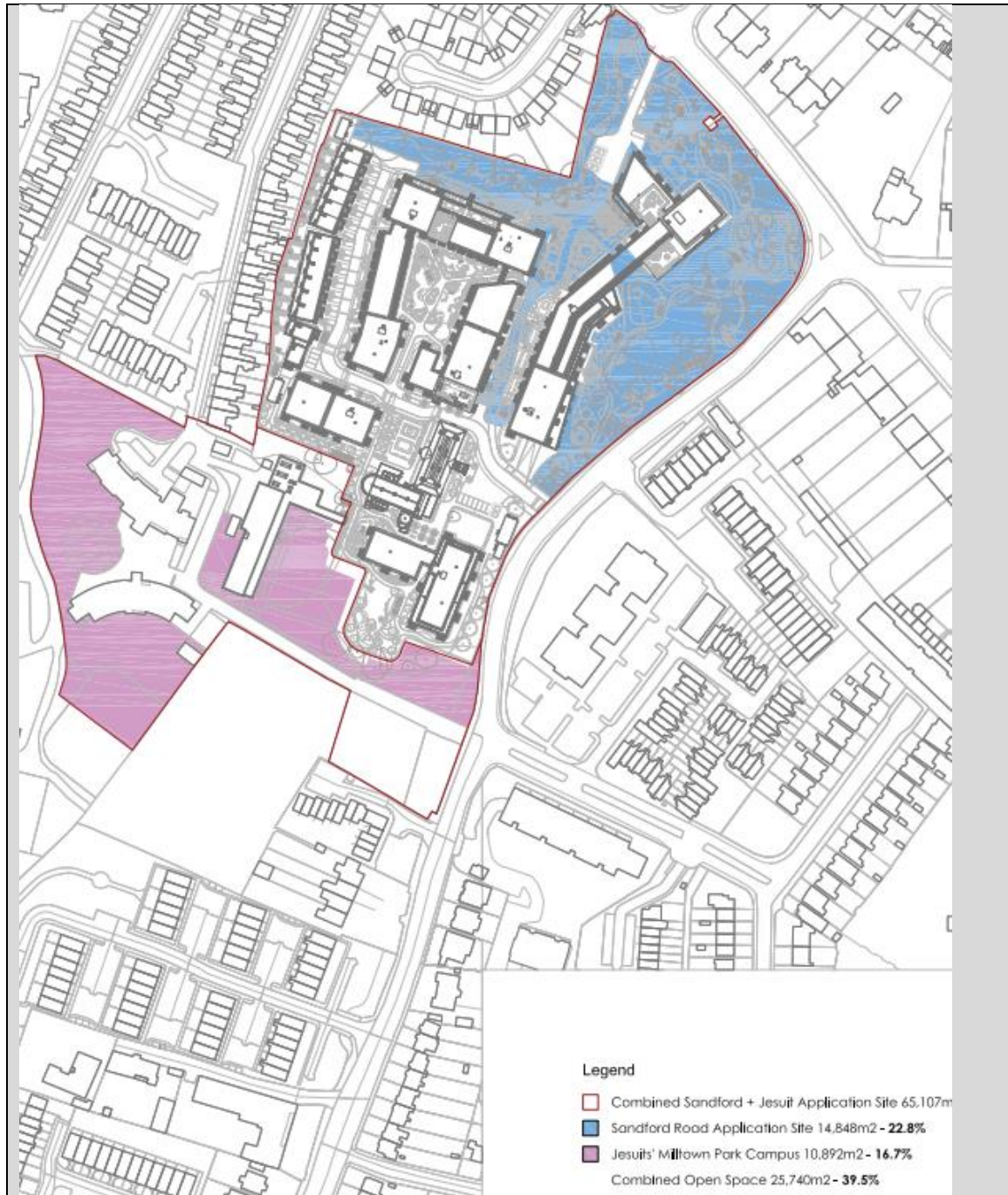
As noted previously, a letter has been received from the Jesuit Community which confirms that the lands sold to the Applicant are no longer required by the Community due to a decline in vocations. The Jesuit Community have retained the institutional lands/buildings on land parcel No. 2 which address 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: (and full description of development outlined in Chapter 3 of this EIAR):





**Figure 2.14:** OS Map Demonstrating 25% Open Space Will Still be Provided Across the Application Lands and the remaining Jesuit Community lands

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

This section demonstrates that the proposal is fully in accordance with the policies and objectives of the Z15 zoning pertaining to the site.

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

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

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

The public open space is provided as follows:

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



**Figure 2.15: Public Open Space Provision at the Application Site**

(Source: Cameo and Partners Design Studio, 2021)



**Figure 2.16: Public Open Space Provision at the Subject Lands**

(Source: Cameo and Partners Design Studio, 2021)

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

The majority of this space (25.8%) will be provided in the public park and the plaza area which are linked through the triple height undercroft of Block A1. This triple height linked archway through Block A1 will create a strong connection between the public park and the public plaza and thus it is clear that the required 25% public open space has not been split up as demonstrated in Figures 2.15/2.16. The plaza area will not allow vehicular access to ensure a safe and attractive space is provided for pedestrians.

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

The proposed development will remove all Category U<sup>4</sup> trees for ecological purposes. To improve the quality and usability of the open space areas to the north and east of the site, the poor-quality Category C<sup>5</sup> trees (91 No.) are recommended for removal and thus the proposed development will seek to open up this park for residents and visitors to enjoy. The transformation of this space into a public park will ensure that this large existing landscape feature has been retained in the masterplan which as discussed above, will be significantly improved and made usable.

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

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

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

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<sup>4</sup> 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)

<sup>5</sup> Trees of low quality and value (a minimum of 10 years). (CMK, 2021)



will contribute towards providing a high-quality environment for the public and future residents.

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

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

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

Furthermore, the *Development Plan* states:

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

As noted above, the subject application lands at Milltown Park have always been in private use and 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.

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

### 3.0 DESCRIPTION OF THE PROPOSED DEVELOPMENT

#### 3.1 Introduction

This chapter of the EIAR was prepared by Patricia Thornton. Patricia Thornton (BSc. Surv) (MRUP), Director of Thornton O'Connor Town Planning, is a Corporate member of the Irish Planning Institute and has 18 No. years post-qualification experience. Patricia has experience in preparing and coordinating EIARs for a variety of projects and has also been involved in the coordination of a wide range of developments including residential and commercial developments.

The chapter will set out a detailed description of the proposed development in accordance with Article 5 (1)(a) of the EU Directive 2014/52/EU which notes that the following should be included:

*'a description of the project comprising information on the site, design, size and other relevant features of the project.'*

The proposed development primarily comprises the demolition of c. 4,883.9 sq m of existing structures on site, the reuse and refurbishment of c. 2,324 sq m of existing structures on site (Tabor House and Chapel) and the construction of 671 No. residential units with ancillary residential facilities and amenities in addition to a creche as detailed below.

#### 3.2 Description of the Site Area

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

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

A letter of consent has been received from Dublin City Council to carry out works on Milltown Road, Sandford Road and Eglinton Road.

#### 3.3 Summary of the Proposed Development:

The proposed development will principally include the following:

- 607 No. Build-to-Rent units in Blocks A1, A2, B, C, D, F and Tabor House (88 No. studios, 262 No. 1 bed units, 242 No. 2 bed units and 12 No. 3 bed units) and 67 No. Build-to-Sell units in Blocks D and E (11 No. studios, 9 No. 1 bed units, 32 No. 2 bed units and 15 No. 3 bed units);
- The blocks will range in height from 2 to 10 No. storeys with a partial basement provided under part of Block A1 and under Blocks A2, B and C)

- Communal residential amenities (c. 1,248.8 sq m) and facilities (c. 158.3 sq m) throughout the residential blocks, Tabor House and the converted Chapel;
- Creche within Block F (400 sq m);
- A 2.4 metre high boundary wall across the site from east to west (towards the southern boundary) in order to 'separate' the Applicant's lands from the remaining Jesuit lands;
- Public Open Space (14,848 sq m), Communal Open Space (5,444 sq m) and Upper Floor Communal Terraces (431 sq m); and
- Road works on Sandford Road and Milltown Road and Drainage Works on Eglinton Road.

<b>Key Site/Development Statistics</b>	
<b>Site Area:</b>	<p>Total Red Line Application Boundary:</p> <p><b>c. 4.74 Ha (c. 47,335 sq m) broken down as follows:</b></p> <ul style="list-style-type: none"> <li>• 'Developable' Site Area: <b>c. 4.26 Ha (c. 42,547 sq m):</b></li> <li>• Road works to Milltown Road and Sandford Road adjacent to the 2 No. proposed entrances: <b>c. 0.16 Ha (c. 1,597 sq m)</b></li> <li>• Drainage works to Eglinton Road: <b>c. 0.32 Ha (c. 3,191 sq m)</b></li> </ul>
<b>Existing Gross Floor Area</b>	c. 7,226.9 sq m
<b>Extent of Reuse and Refurbishment</b>	c. 2,343 sq m (Tabor House - 1,575 sq m and The Chapel – 768 sq m)
<b>Demolition Area</b>	<p>c. 4,883.9 sq m including:</p> <ul style="list-style-type: none"> <li>• Milltown Park House (880 sq m);</li> <li>• Milltown Park House Rear Extension (2,031 sq m);</li> <li>• the Finlay Wing (622 sq m);</li> <li>• the Archive (1,240 sq m);</li> <li>• the link building between Tabor House and Milltown Park House rear</li> </ul>

	<p>extension to the front of the chapel (74.5 sq m); and</p> <ul style="list-style-type: none"> <li>36.4 sq m of the 'red brick link building' (single storey over basement) towards the south-western boundary.</li> </ul>
<b>Gross Floor Space (Above Ground)</b>	54,871 sq m (including 400 sq m creche)
<b>Basement Gross Floor Area</b>	10,607 sq m
<b>Site Coverage:</b>	23.4%
<b>Plot Ratio:</b>	1.29
<b>No. of Units Proposed</b>	671 No. units (604 No. Build-to-Rent units and 67 No. Build-to-Sell units)
<b>No. of Units per ha.</b>	157.5 No.
<b>Max. parapet height:</b>	31.575 No. metres plus lift overruns
<b>Car Parking Spaces:</b>	<p>295 No. at basement and 49 No. at surface level provided as follows:</p> <p><b>Surface</b></p> <ul style="list-style-type: none"> <li>35 No. resident spaces including 4 No. mobility impaired spaces;</li> <li>4 No. set-down/collection spaces;</li> <li>5 No. GoCar;</li> <li>2 No. taxi; and</li> <li>3 No. creche parking spaces.</li> </ul> <p><b>Basement</b></p> <ul style="list-style-type: none"> <li>295 No. resident parking spaces (including 14 No. mobility impaired spaces, 35 No. Electric Vehicle spaces, 5 No. Development Car Share Spaces)</li> </ul>
<b>Bicycle Parking Spaces</b>	1,361 No.
<b>Motorcycle Spaces</b>	14 No.
<b>Public Open Space</b>	<p>34.9% (14,848 sq m) of developable site area (42,547 sq m):</p> <ul style="list-style-type: none"> <li>Public Park &amp; Plaza connected through the undercroft of Block A1 (10,970 sq m – 25.8% of the c. 42,547 sq m developable site area)</li> <li>Northern Woodland Glade (c. 3,328 sq m (c. 7.8% of the c. 42,547 sq m developable site area)</li> <li>Boulevard between Blocks A and B</li> <li>c. 550 sq m (c. 1.2% of the c. 42,547 sq m developable site area)</li> </ul>

<b>Communal Open Space</b>	12.8% (5,444 sq m) of developable site area (42,547 sq m) as follows: <ul style="list-style-type: none"> <li>• Belvedere Garden (North of Block C): 120 sq m</li> <li>• Tabor House and Formal Food Garden: 3,704 sq m</li> <li>• Courtyard between Block B and C: 1,510 sq m; and</li> <li>• Front of communal internal spaces in Block B and C: 110 sq m</li> </ul>
<b>Communal Amenity Terraces</b>	Upper Level Terraces are provided in Blocks A1, B and C (431 sq m)
<b>Internal Communal Amenity Space</b>	The total communal internal amenity space provided is c. 1,248.8 sq m) throughout the residential blocks, Tabor House and the converted Chapel building including: <ul style="list-style-type: none"> <li>• lounges;</li> <li>• co-working space;</li> <li>• gymnasium;</li> <li>• reading rooms;</li> <li>• games room; and</li> <li>• multi-purpose space.</li> </ul>

The full description of development is provided below as described in the Statutory Notices.

### 3.4 Description of Development in the Statutory Notices

The following description of development has been provided in the Statutory Notices:

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

The development will principally consist of: the demolition of c. 4,883.9 sq m of existing structures on site including Milltown Park House (880 sq m); Milltown Park House Rear Extension (2,031 sq m); the Finlay Wing (622 sq m); the Archive (1,240 sq m); the link building between Tabor House and Milltown Park House rear extension to the front of the Chapel (74.5 sq m); and 36.4 sq m of the 'red brick link building' (single storey over basement)



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

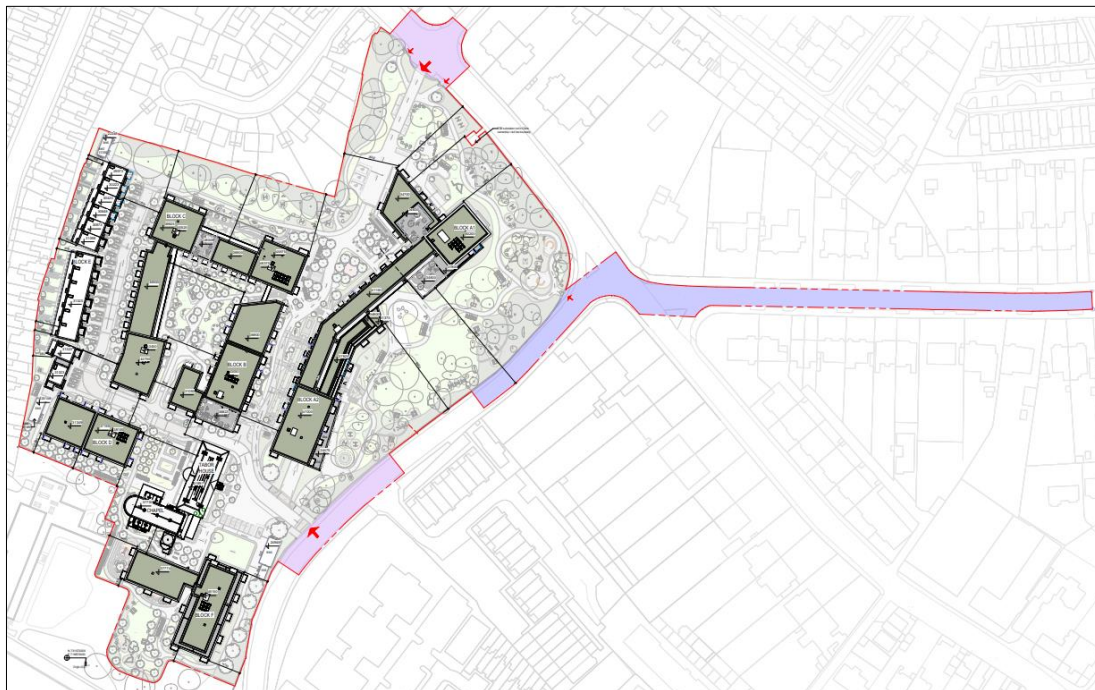
Block A1 will range in height from part 5 No. storeys to part 10 No. storeys and will comprise 94 No. Build-to-Rent apartments; Block A2 will range in height from part 6 No. storeys to part 8 No. storeys (including part double height at ground floor level) and will comprise 140 No. Build to-Rent apartments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

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

The proposed works also include a new 2.4 metre high boundary wall across the site from east to west (towards the southern boundary) requiring the demolition of a portion of the red brick link building that lies within the subject site towards the south-western boundary (36.4 sq m) and the making good of the façade at the boundary. The existing Link Building is the subject of a separate application for permission (DCC Reg. Ref. No. 3866/20) that includes a request for permission to demolish that Link Building, including the part of the building on the lands the subject of this application for SHD permission. If that application is granted and first implemented, no demolition works to the Link Building will be required under this application for SHD permission. If that application is refused permission or not first implemented, permission is here sought to demolish only that part of the Link Building now existing on the lands the subject of this application for permission and to make good the balance at the red line with a blank wall.

The development also provides a new access from Milltown Road (which will be the principal vehicular entrance to the site) in addition to utilising and upgrading the existing access from Sandford Road as a secondary access principally for deliveries, emergencies and taxis; new pedestrian access points; pedestrian/bicycle connections through the site; 344 No. car parking spaces (295 No. at basement level and 49 No. at surface level) which includes 18 No. mobility impaired spaces, 10 No. car share spaces, 4 No. collection/drop-off spaces and 2 No. taxi spaces; bicycle parking; 14 No. motorcycle spaces; bin storage; boundary treatments; private balconies and terraces facing all directions; external gantry access in sections of Blocks A1, A2 and C; hard and soft landscaping including public open space and communal open space (including upper level communal terraces in Block A1, Block B and

Block C which will face all directions); sedum roofs; PV panels; substations; lighting; plant; lift cores; and all other associated site works above and below ground. The proposed development has a gross floor space of c. 54,871 sq m above ground level over a partial basement (under part of Block A1 and under Blocks A2, B and C) measuring c. 10,607 sq m, which includes parking spaces, bin storage, bike storage and plant.



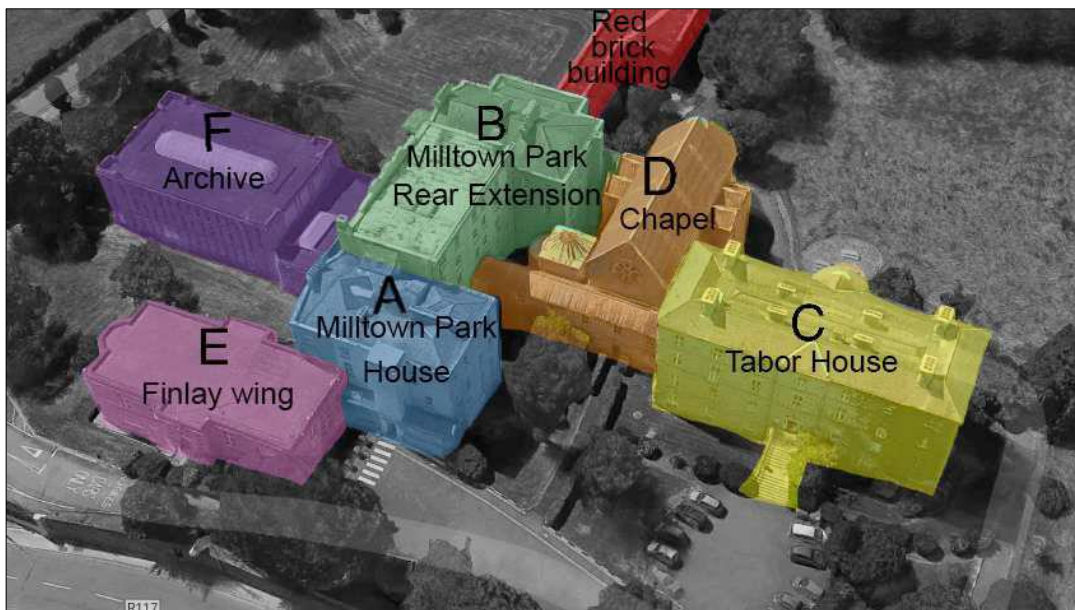
**Figure 3.2: Layout of the Proposed Scheme**

**(Source: O'Mahony Pike Architects, 2021)**

### 3.5 Details of the Proposed Development

#### 3.5.1 Reuse and Demolition of Existing Buildings

This section will detail the existing buildings to be reused/refurbished and demolished at the subject site. The outline of each building element is presented in Figure 3.3 below and detailed descriptions of each building are discussed in Chapter 7 of this EIAR (Architectural Heritage) which has been prepared by Molloy and Associates Conservation Architects.



**Figure 3.3: Identification of Existing Buildings**

(Source: Molloy and Associates Conservation Architects, 2021)

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

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. 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.

Early in the design process, studies were carried out in order to ascertain what buildings could be functionally retained and refurbished on the site. It was ultimately considered that Tabor House and The Chapel would be retained and reused in the proposed development and the remaining buildings would be demolished. The building elements to be demolished were considered for various uses however having regard to the existing limited floor to ceiling heights and poor infiltration of daylight to the building grouping for example, in addition to quantum of alterations that would be required which would essentially dramatically alter the appearance of some of the existing fabric, it was concluded that their

adaption is not efficient. Chapter 4 of this EIAR discusses alternative options for the proposed development.

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

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



**Figure 3.4:**  
**Images of front and rear of Tabor House and the Chapel to be Reused within the Development.**  
  
 (Source: Molloy and Associates Conservation Architects, 2021)





**Figure 3.5: Images of Buildings to be Demolished as part of the Proposed Development**

**(Source: Molloy and Associates Conservation Architects, 2021)**

It is proposed to repurpose Tabor House to provide 24 No. Build-to-Rent units and also to provide communal internal amenity space within the refurbished Chapel. The reuse and refurbishment of Tabor House and the Chapel will allow a new setting to be created in the landscape and the buildings will act as a focal point for the development especially entering the site from Milltown Road or walking through the pedestrian street from the northern end with glimpses of Tabor House shown through the setbacks of Block B.

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

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

Please see Figures 3.6 and 3.7 below which demonstrates the views of Tabor House from the pedestrian boulevard and the new entrance from Milltown Road.



**Figure 3.6: CGI Towards Tabor House from the Pedestrian Boulevard**

(Source: 3D Design Bureau, 2021)



**Figure 3.7: CGI Towards Tabor House from the New Milltown Road Entrance**

(Source: 3D Design Bureau, 2021)

### 3.4.2 Residential Unit Types

The proposed development principally comprises the provision of 671 No. residential units (604 No. Build-to-Rent units and 67 No. Build-to-Sell units), ancillary residential support facilities and amenities and a creche.



The unit mix provided for the proposed 550 No. Build-to-Rent units is as follows:

- 88 No. studios
- 262 No. 1 beds
- 242 No. 2 beds
- 12 No. 3 beds

The unit mix provided for the proposed 67 No. Build-to-Sell units is as follows:

- 11 No. studios
- 9 No. 1 beds
- 32 No. 2 beds
- 15 No. 3 beds

The scheme provides 67 No. Part V units (39 No. in Block D and 28 No. in Block F) which will cater for persons in need of a dwelling as per the social housing list (23 No. studios, 13 No. one beds, 30 No. two beds and 1 No. three bed).

The proposed dwelling mix and types will provide an enhanced choice in tenure in the area, affording greater flexibility to those who may be seeking to rent an apartment in the area or looking to purchase a dwelling.

### 3.4.3 Creche

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

Although the Childcare Demand Assessment prepared by KPMG Future Analytics enclosed separately concludes that there is sufficient capacity in the area to cater for the proposed development, the Applicant has decided to incorporate a crèche into the scheme which 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.

### 3.4.4 Residential Support Amenities and Facilities

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

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

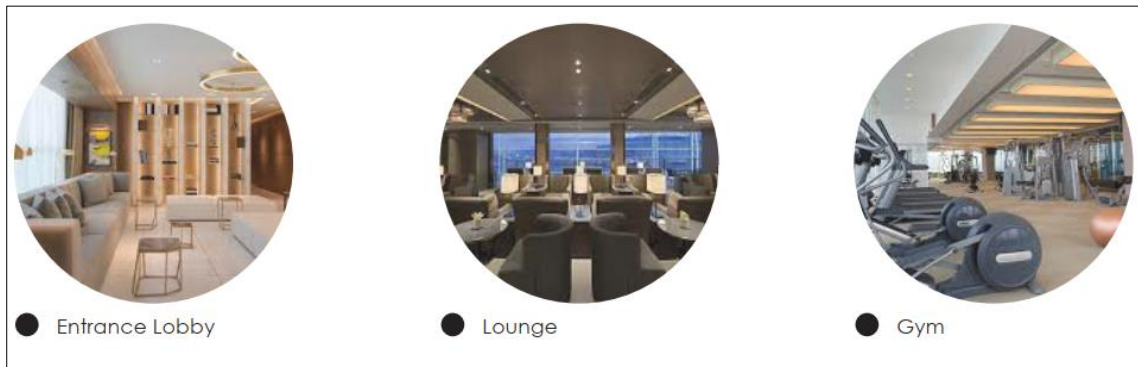
	Amenities	Sq m
<b>Block A1 - GF</b>	Lounge, Reading room	198.8
<b>Block A1 - 04</b>	Residents club	111.4
<b>Block B - GF</b>	Lounge, Reading room	52.1
<b>Block B - 05</b>	Residents Lounge	117.4
<b>Block C - GF</b>	Co- working space	115.1
<b>Tabor House - GF</b>	Lounge	15.2

<b>Tabor House - 01</b>	-	-
<b>The Chapel GF (Residents Hub)</b>	Gym, Games rooms, Kitchen, Garden room	288.9
<b>The Chapel 01 (Residents Hub)</b>	Lounge, co working, Meeting room, Multipurpose space	349.9
<b>TOTAL</b>		<b>1248.8</b>

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

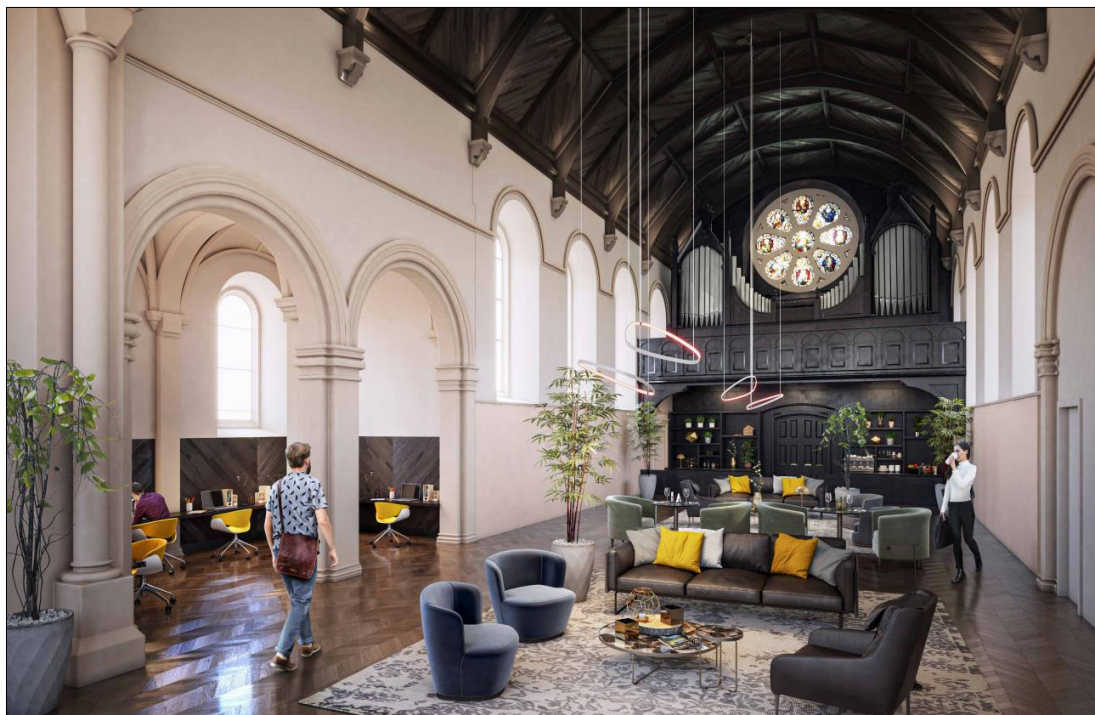
	<b>Facilities</b>	<b>Sq m</b>
<b>Block A1 - GF</b>	Concierge, Mail, WC	70.7
<b>Block A1 - 04</b>	-	-
<b>Block B - GF</b>	Concierge & Mail	45.6
<b>Block B - 05</b>	-	-
<b>Block C - GF</b>	-	-
<b>Tabor House - GF</b>	-	-
<b>Tabor House - 01</b>	Lobby & Mail	18.8
<b>The Chapel GF (Residents Hub)</b>	Staff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

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



**Figure 3.8: Images Demonstrating an Example of the Internal Amenity Spaces to be Provided**

(Source: OMP Architects Design Statement, 2021)



**Figure 3.9: 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.

#### **3.4.4 Roadworks**

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

#### ***Milltown Road***

The new Milltown Road access will be the principal vehicular access for the proposed development facilitating access to the basement car park, the forecourt adjacent to Tabor House and the duplex units and apartments along the western boundary (Block E). This new access will also facilitate pedestrians and cyclists. As detailed in Chapter 10 and Chapter 15 prepared by DBFL Consulting Engineers, the following principal works are proposed:

- Provision of a new vehicle access off Milltown Road (primary vehicle access to the proposed development facilitating access to the basement carpark as well as serving pedestrians and cyclists). This new site access shall be a priority junction. A Toucan Crossing is also proposed in the vicinity of the Milltown Road access to improve facilities for vulnerable road users.

### *Sandford Road*

The existing access from Sandford Road will be utilised as the secondary vehicular access to the site, principally for deliveries, emergencies and taxis with a small element of mobility impaired parking and thus will have very minimal traffic movements. Fire tender access will also be provided from this entrance and pedestrian and cyclist access will also be facilitated.

As detailed in Chapter 10 and Chapter 15 prepared by DBFL Consulting Engineers and enclosed separately, the following principal works are proposed:

- Retain existing entrance on Sandford Road (facilitates pedestrian and cycle access as well as limited vehicle access to the northern end of the site). Improvements to existing pedestrian crossing point in the vicinity of the Sandford Road entrance is also proposed. There is no vehicular access from Sandford Road to the basement carpark, the forecourt area adjacent to Tabor House and the duplex units along the western boundary (which are all served exclusively from Milltown Road).

### **3.4.5 Drainage Works**

The following works are detailed by DBFL Consulting Engineers in Chapter 11 (Water & Hydrology):

*'Provision of on-site surface water drainage infrastructure which will discharge from the site along its south-eastern boundary via Milltown Road and the junction of Milltown Road / Sandford Road prior to discharging to the existing public surface water drainage network in Eglinton Road (proposed 300mm diameter pipe extending approximately 300m from the proposed development site boundary to the outfall location which includes replacement of approx. 160m of the existing 225mm diameter drainage network along Eglinton Road).*

*...The public surface water network on Eglinton Road is expected to provide a suitable surface water discharge point for the proposed development. However, in order to achieve the required drainage invert levels on site, approximately 160m of the existing 225mm diameter drainage network along Eglinton Road will need to be replaced with a 300mm pipe running at a flatter gradient. The proposed surface water drainage network will collect surface water runoff from the site via a piped network.'*

Please refer to Chapter 11 of this EIAR prepared by DBFL Consulting Engineers. We also note that an Infrastructure Report has been prepared by DBFL Consulting Engineers and is enclosed separate to this EIAR.

### 3.4.6 Height and Layout

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

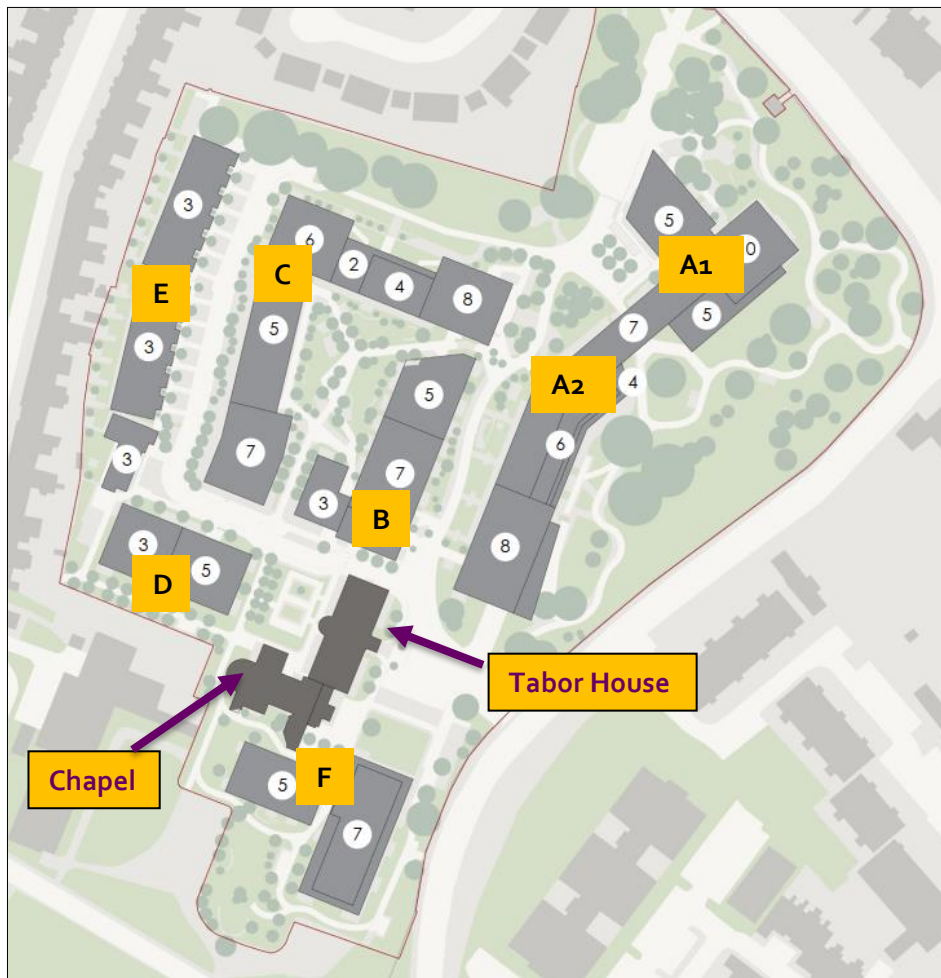
The proposed layout has positioned the highest forms at the least sensitive locations throughout the site (fronting Milltown Road and Sandford Road, fronting the large public open space area to the east of the site, and towards the centre and southern portions of the subject lands), at a distance from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

#### *Proposed Heights*

The proposed heights are as follows:

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





**Figure 3.9: Proposed Layout of the Subject Development with the Heights Annotated**

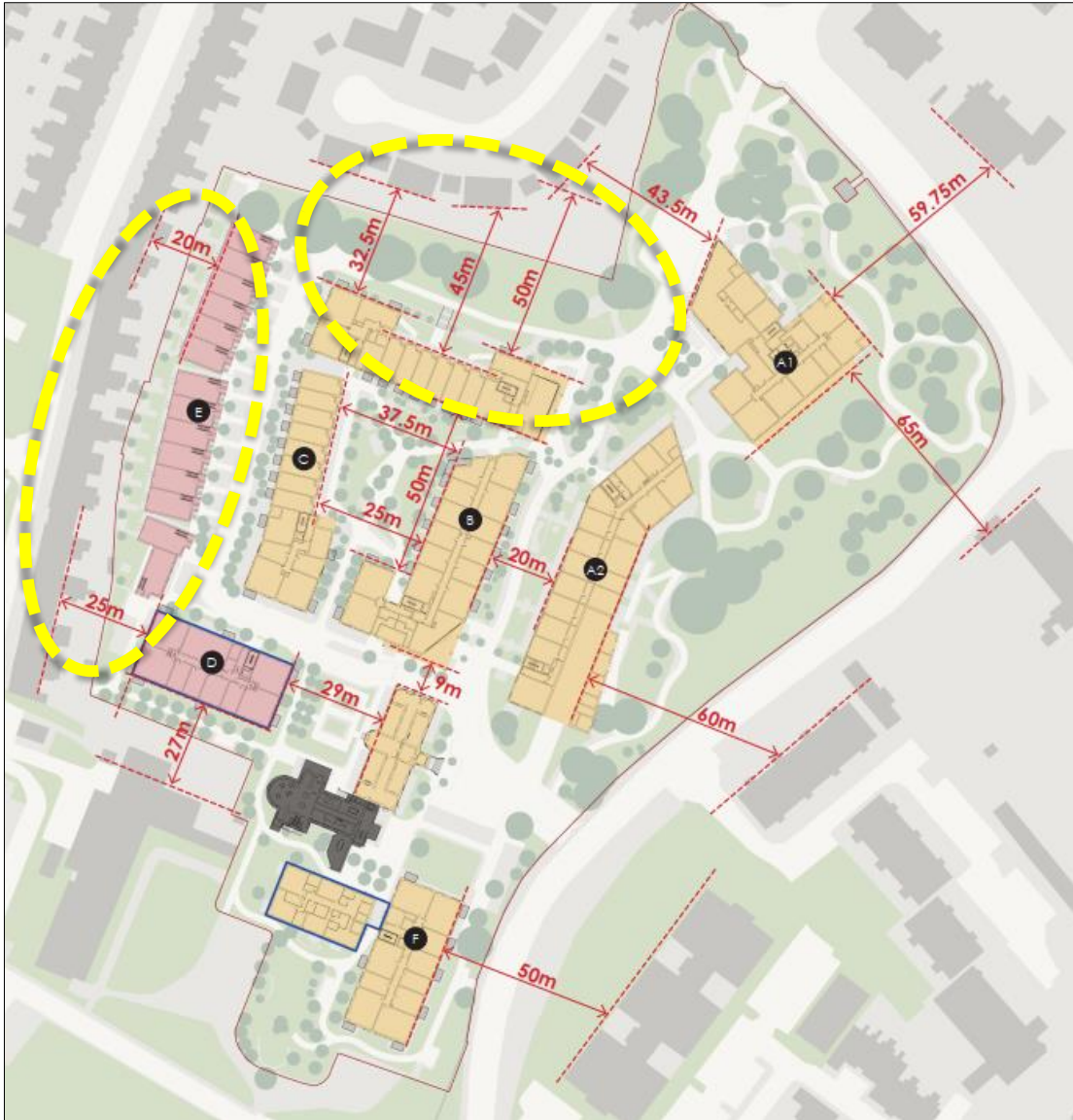
(Source: OMP Architects, 2021)

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

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

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

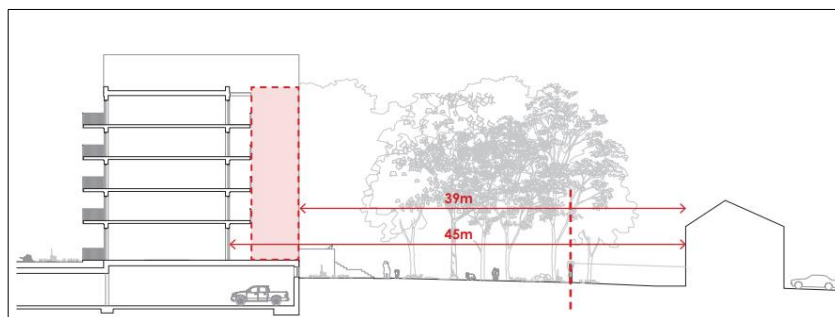
along the northern boundary, which will provide a 45 No. metre setback from the rear of the Norwood Park dwellings. Norwood Park is also protected by a tree belt along the northern boundary.



**Figure 3.10: 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 3.11: 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 the remaining Jesuit lands will be provided with the new 2.4-metre-high boundary wall proposed as part of this planning application to separate the Applicant's lands from the remaining Jesuit lands.

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

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

*'The intention of this height is to (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).'*

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

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

*'The junction funnels traffic from three urban cores, i.e. Clonskeagh/UCD, Milltown and Donnybrook towards the city centre via Ranelagh. The site occupies the most prominent of the four quadrants around the junction. Due to a number of factors, including the non-*

*orthogonal configuration of the junction, the absence of buildings at the corner of the site, and the wall and trees along the site boundary, the junction does not manifest as a distinct 'place' in the townscape. Despite the large houses and trees around the junction it does not figure clearly in people's mental map of the area and does not contribute positively to legibility.*

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

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

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

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

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

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

The OMP Masterplan & Architectural Design Statement states the following in relation to the massing strategy and also details various massing studies which have resulted in the current layout proposal, including focus on providing public park and enhancing permeability:

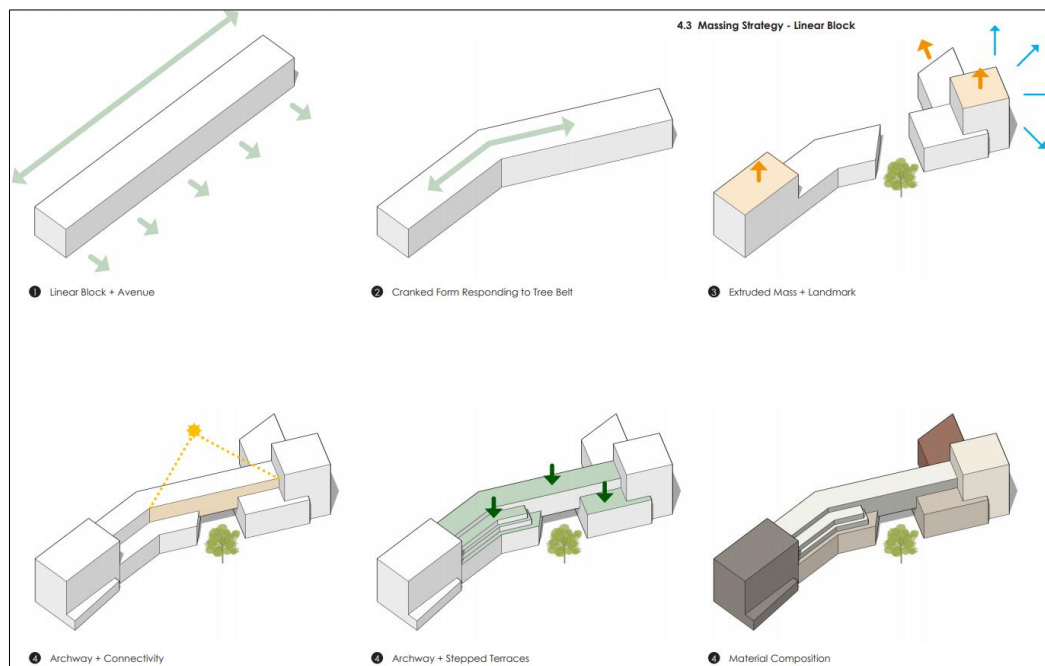
*'From the outset we investigated the relationship between the existing woodland park to the East and our proposal, looking to enhance connectivity between the park and the*

*internal public square while improving permeability through the site. We also opened the site to provide a public short-cut along the natural desire line from the new Milltown entrance to Ranelagh Village via this parkland edge and exiting through the existing entrance at Sandford Road.*

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

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

Figure 3.12 below demonstrates the massing strategy for Block A for example:



**Figure 3.12: Block A Massing Strategy**

(Source: O' Mahony Pike Architects, 2021)

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





**Figure 3.13: Existing Buildings Massing Strategy**

(Source: O' Mahony Pike Architects, 2021)

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

#### 3.4.7 Access Arrangements and Parking

The principal vehicular access to the subject site is provided from Milltown Road which will facilitate access to the basement car park, the forecourt adjacent to Tabor House and the duplex units and apartments along the western boundary (Block E). This new access will also facilitate pedestrians and cyclists. DBFL Consulting Engineers have noted in the Traffic and Transport Assessment enclosed separately that the majority of vehicular traffic from Milltown Road (92%-96%) will filter directly into the basement car parking via a ramp proximate to the site entrance (c. 20 metres of the site entrance) and this will ensure that the shared surface to the west of the site adjacent to the Block E duplexes and apartments will not be car dominated and will be a safe environment for all users.

The existing access from Sandford Road will be utilised as the secondary vehicular access to the site, principally for deliveries, emergencies and taxis for example with a small element of mobility impaired parking for residents and thus will have very minimal traffic movements. Fire tender access will also be provided from this entrance and pedestrian and cyclist access will also be facilitated. 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 Parking Strategy prepared by DBFL Consulting Engineers and enclosed as a separate document details the car parking arrangements for the site. In summary, a total of 344 No. car parking spaces are provided in the proposed scheme (295 No. basement and 49 No. surface) and can be broken down as follows:

Use Type	Basement	Surface
<b>Apartments</b>	290 (including 14 mobility impaired and 35 EV parking)	35 No. (including 4 No. mobility impaired)
<b>Car Share</b>	5 No. Development Car Share	5 No. (all GoCar)
<b>Collection/Drop-Off/Set-Down</b>	-	4
<b>Taxi</b>	-	2
<b>Crèche</b>	-	3
<b>Total</b>	<b>295</b>	<b>49</b>

In addition, some 1,361 No. bicycle parking spaces have been provided to serve the proposed development. The overall bicycle parking provision includes 9 No. cargo bicycle spaces (5 No. at basement level and 4 No. at surface level). Some 14 No. motorcycle space have been provided in the basement to serve the proposed development.

### 3.4.8 Proposed Materials

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

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

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

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

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



*'The completed building expression provides a simple building form that reinterprets the surrounding building fabric to relate positively to neighbouring structures and create a harmonious whole.*

*The architecture of each building varies enough to ensure a diverse and interesting urban fabric, albeit within a considered palette of complimentary materials and colours.*

*Subtle variations in the architectural expression and material palette of the different blocks to ensure a diverse and interesting urban fabric, albeit within a considered palette of complementary materials and colours that provide a degree of variation and interest as the building forms progress and relate to the different surrounding conditions.'*

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

#### 3.4.9 Open Space and Landscaping

The application lands have always been in private use and have thus been closed off from the general public. Therefore, the landscape strategy for the site will completely open up the site as a public amenity for the first time. The landscaping strategy has been prepared by Cameo and Partners Design Studio and is enclosed separately with this planning application. The Landscape Design Statement sets out in detail the open spaces provided throughout the site and notes that:

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

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



Figure 3.14: Extract of Ground Floor Illustrative Landscape Masterplan

(Source: Cameo and Partners Design Studio, 2021)





**Figure 3.15: Aerial View of the Proposed Development Demonstrating the Green Emphasis of the Scheme**

(Source: 3D Design Bureau, 2021)

### *Public Open Space*

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

The public open space is provided as follows:

- **Public Park and Plaza Area Connected Through the Triple Height Undercroft of Block A<sub>1</sub>:**  
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)

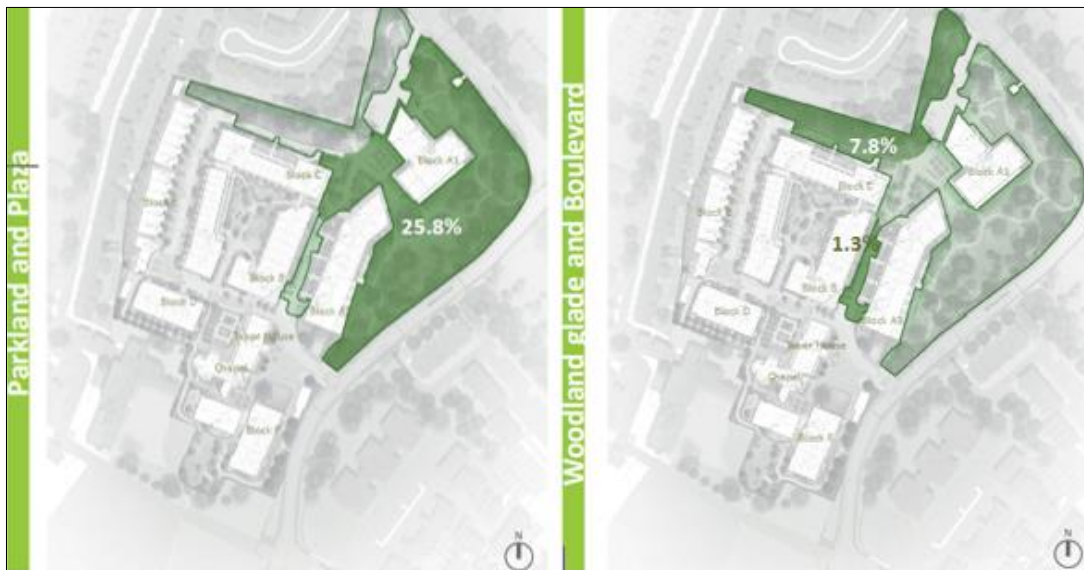


Figure 3.16: Public Open Space Provision at the Application Site

(Source: Cameo and Partners Design Studio, 2021)



Figure 3.17: Public Open Space Provision at the Application Site

(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 eastern parkland and the plaza area which are linked through the triple height undercroft of Block A1.

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

The proposed development will remove all Category U<sup>1</sup> trees for ecological purposes. To improve the quality and usability of the open space areas to the north and east of the site, the poor-quality Category C<sup>2</sup> 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. Therefore, the provision of a high quality useable public park available to the wider community at the site will be a significant planning gain for the area (as the public have never enjoyed any right of access to these privately owned lands).

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

In addition to public park and plaza area connected through the undercroft of Block A1, a parkland walk (known as the Northern Woodland Glade) will also be provided to the north of Block C which is positioned adjacent to the plaza and the communal amenity space in Block C. This northern space represents c. 7.8% of the site area (or c. 3,328 sq m) and will provide further amenity on site in excess of the 25% requirement. In addition to utilising the eastern public park to travel through the site, the public can also utilise the pedestrian connection from Milltown Road and Sandford Road through the pedestrian boulevard (550 sq m or 1.3% of site area) between Blocks A and B.

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<sup>1</sup> 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)

<sup>2</sup> Trees of low quality and value (a minimum of 10 years). (CMK, 2021)



Figure 3.18: Illustrations of the Proposed Transformed Parkland

(Source: Cameo and Partners Design Studio, 2021)



Figure 3.19: Illustrations of the Proposed Transformed Parkland

(Source: Cameo and Partners Design Studio, 2021)





**Figure 3.20: Illustrations of the Triple Height Archway Linking the Parkland and the Plaza Area (see Top Left Image Showing Bollards to Prevent Access to Plaza)**

(Source: Cameo and Partners Design Studio, 2021)



**Figure 3.21: Illustrations of the Plaza Area**

(Source: Cameo and Partners Design Studio, 2021)

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



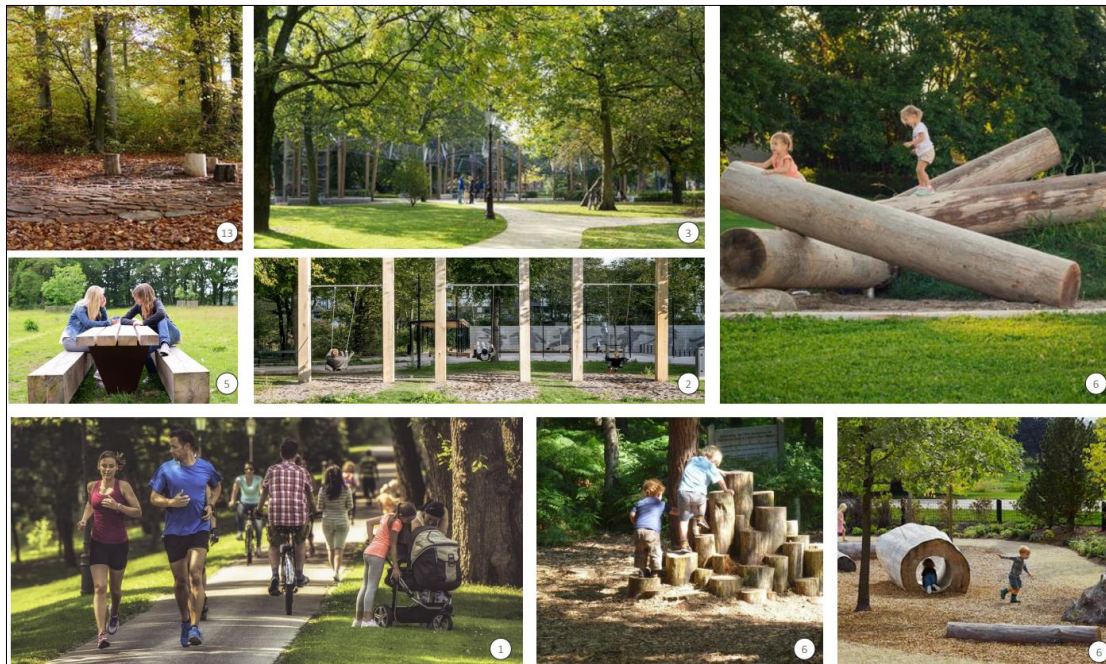


Figure 3.22: Examples of Public Open Space Features

(Source: Cameo and Partners Design Studio, 2021)



Figure 3.23: Illustrations of the Woodland Glade to the North of Block C

(Source: Cameo and Partners Design Studio, 2021)



**Figure 3.24:** Illustration of the Pedestrian Street Linking Milltown Road Entrance to the Public Plaza and Beyond to Sandford Road

(Source: Cameo and Partners Design Studio, 2021)

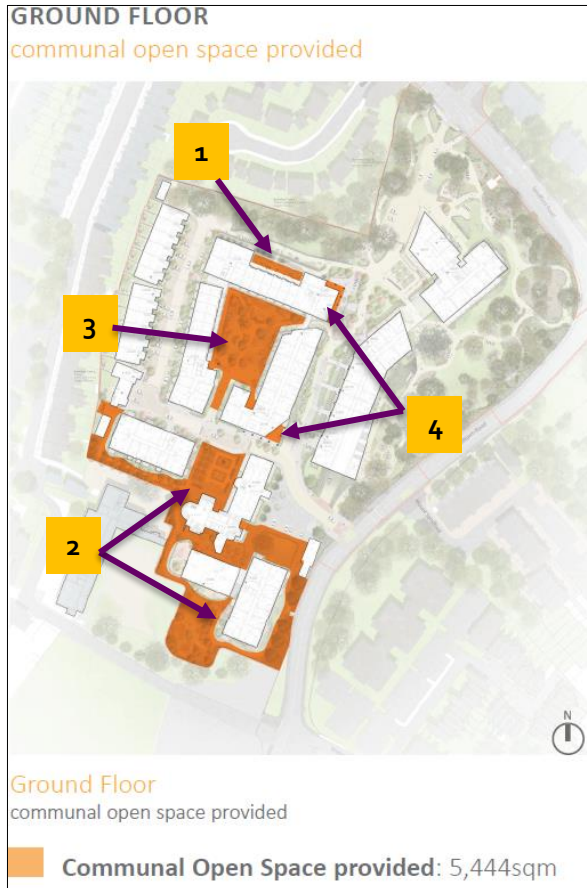
Therefore, it is clear that the proposed layout has comprehensively considered the public open spaces within the scheme. These spaces will be high-quality and will provide a place to meet, sit, exercise or to walk or cycle through, which is currently not an amenity available at the lands as the site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

### *Communal Open Space*

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

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





**Figure 3.25: Communal Open Space Provision at the Application Site at Surface Level**

(Source: Cameo and Partners, 2021)

An example of the landscaped communal areas are provided in Figures 3.26 – 3.29 below:



**Figure 3.26: Illustrations of the Belvedere Garden to the North of Block C**

(Source: Cameo and Partners Design Studio, 2021)



Figure 3.27: CGI of the Courtyard Between Blocks B and C

(Source: 3D Design Bureau, 2021)



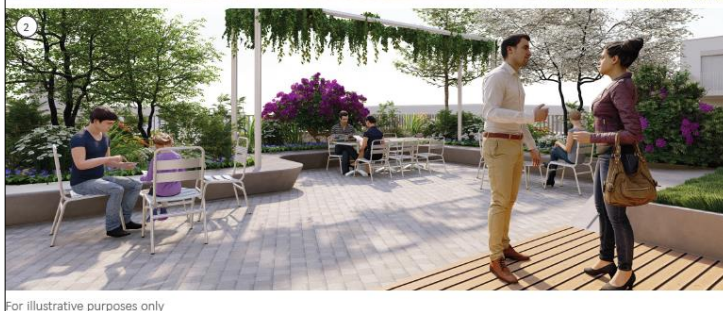
Figure 3.28: Illustrations of Communal Open Space - Tabor House and Food Garden

(Source: Cameo and Partners Design Studio, 2021)

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



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



For illustrative purposes only



**Figure 3.29: Illustrative Images of the Communal Amenity Terraces Proposed**

(Source: Cameo and Partners, 2021)

**Proposed Boundary Treatment**

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

Some 2 No. new pedestrian gates will be provided at each access. In addition, a new pedestrian access will be provided at the junction of Milltown Road and Sandford Road which demonstrates that ample permeable opportunities are provided in the proposed development.

A portion of the boundary treatment of the existing wall will be modified along Milltown Road and Sandford Road. In this regard, a proposed upstand wall with railing will be provided

in lieu of the existing cement or stone wall (predominately render removed) which will allow views into the site and will thus visually open the site up to the public and will enhance legibility in the area.

Cameo and Partners have also developed a strategy for the boundary treatment as follows:



**Figure 3.30: Boundary Treatment Strategy**

(Source: Cameo and Partners Design Studio, 2021)



**Figure 3.31: Illustrations of the Proposed Boundary Treatment at the Junction of Sandford Road and Milltown Road and New Pedestrian Entrance**

(Source: Cameo and Partners Design Studio, 2021)



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

### 3.4.10 Trees

The Arboricultural Assessment, Arboricultural Impact and Tree Protection Strategy 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 Tree Survey and Constraints Plans, Tree Protection Plans and Arboricultural Impact Plans.

The Report notes:

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

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

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

**Table 3.** Tree Removal Categories

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

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

The Report notes the following in relation to tree removal:

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

*The removal of trees will be most pronounced on the western boundary and within the central section of the site where the main footprint of the development is located and*



*where all the existing trees will be removed. The trees in these areas are primarily early-mature moderate value (category B) cherry, lime and holly.*

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

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

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

Proposed new tree planting is contained within the accompanying landscape drawings by Cameo & Partners Design Studio (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.

### 3.4.14 Phasing

The proposed development is planned to be constructed on a phased basis over c.34 No. months. It is estimated that there will be c. 4 No. phases during the construction stage as follows:

Phase	Works	Estimated Time	Outline Works
Phase 1	Site Set Up, Enabling Works and Demolitions	Months 1-5	<p><i>Site Set Up for all Blocks.</i></p> <ul style="list-style-type: none"> <li>• Site cabin delivery and placement;</li> <li>• Completion of all outstanding required surveys;</li> <li>• Contractor temporary service installations etc.;</li> <li>• Construction of appropriate hoarding to neighbouring properties;</li> <li>• Installation of CCTV coverage or other agreed security means;</li> <li>• Set up of required noise, dust, vibration monitoring stations, receptors in predetermined areas closest to sensitive locations as defined by the grant of planning;</li> <li>• Review environmental controls defined within the EIAR;</li> <li>• Tree protection installed;</li> <li>• Connection to new main temporary power board to feed the following: <ul style="list-style-type: none"> <li>○ site security load   requirements; and</li> <li>○ all storage area requirements.</li> </ul> </li> </ul> <p><i>Demolition and Enabling Phase</i></p> <ul style="list-style-type: none"> <li>• Remove all debris and rubbish from the site area to licensed tips;</li> <li>• Disposal or re-use of demolition materials will be carried out in accordance with the Development Construction and Demolition Waste Management Plan as prepared by AWN Consulting (Appendix 14.1 of the EIAR)</li> <li>• Ensure, following the demolition of the buildings (or part thereof), the site shall be left in a tidy and safe condition in agreement with the client project manager;</li> <li>• Ensure measures shall be taken to ensure that the existing services in the vicinity of each structure are not affected by the demolition works;</li> <li>• Protection measures for all retained Buildings to be agreed and installed in advance of any works commencing onsite;</li> <li>• Review of temporary work to site boundaries with adjoining houses and liaison protocol with owners;</li> </ul>

			<ul style="list-style-type: none"> <li>Forming of opening in boundary wall onto Milltown Road for construction access and protection of existing boundary walls;</li> <li>Installation of haul road through site onto Milltown Road;</li> </ul>
<b>Phase 2</b>	Basement Box	Months 2-10	<p><i>Basement Works Phase</i></p> <ul style="list-style-type: none"> <li>The development will include a single level basement under Blocks A,B &amp; C to accommodate car parking spaces, bicycle parking, storage, services and plant areas.</li> <li>Substructure works i.e., groundworks, formwork, basement creation (up to ground floor podium), rising concrete elements attenuation and drainage etc. will be completed during this phase.</li> </ul>
<b>Phase 3</b>	Block D & F Apartment Blocks, Tabor House, Chapel and Duplexes (Block E)	<p>Months 5-24</p> <p>→ Tabor House and Chapel Months 5-20</p> <p>→ Blocks D and E (duplexes) Months 6-19</p> <p>→ Block F Months 6-24</p>	<p><i>Tabor House &amp; The Chapel Refurbishment</i></p> <ul style="list-style-type: none"> <li>Isolation of all power and services to the existing building;</li> <li>Soft strip areas deemed to be safe and not contaminated within each structure;</li> <li>Ensuring primary elements of building structures not to be disturbed during soft strip works;</li> <li>Appropriate temporary works as required will be installed to stabilise external walls prior to any internal remodelling taking place, beyond those needed during the initial demolition phase;</li> <li>Construction materials will be loaded out by crane and will follow in accordance with the construction programme;</li> <li>Replacement windows and roof elements (as required) will be fixed as the phase progresses to maintain water tightness;</li> <li>Internal Works – Services, Carpentry, Fit Out, Painting, Joinery etc;</li> <li>Landscaping;</li> <li>Handover;</li> </ul> <p><i>Residential Block Construction</i></p> <ul style="list-style-type: none"> <li>Blocks D,E,F Substructure;</li> <li>Blocks D,E,F Construction of superstructure and vertical elements;</li> <li>Blocks D,E,F Construction of façade elements. This phase will be erected as soon as possible to commence waterproofing to the floors so fit out works can commence;</li> <li>Block D,E, F Fit Out;</li> <li>Snagging / Commissioning / BCAR / Handover;</li> </ul>

			<ul style="list-style-type: none"> <li>• Landscaping and External Works;</li> </ul>
<p><b>Phase 4</b></p>	<p>Block A1, A2, B, C</p>	<p>Months 7-35</p> <p>→ Blocks A1 and A2 Months 7-35</p> <p>→ Block B Months 7-35</p> <p>→ Block C Months 11-35</p>	<p><i>Residential Block Construction</i></p> <ul style="list-style-type: none"> <li>• Mobilisation;</li> <li>• Block A substructure (outside of basement footprint);</li> <li>• Block A Construction of superstructure and vertical elements;</li> <li>• Block A Construction of façade elements. This phase will be erected as soon as possible to commence waterproofing to the floors so fit out works can commence;</li> <li>• Block A Fit Out;</li> <li>• Snagging / Commissioning / BCAR / Handover;</li> <li>• Block B &amp; C substructure (outside of basement footprint);</li> <li>• Block A &amp; C Construction of superstructure and vertical elements;</li> <li>• Block B &amp; C Construction of façade elements. This phase will be erected as soon as possible to commence waterproofing to the floors so fit out works can commence;</li> <li>• Block B &amp; C Fit Out;</li> <li>• Snagging / Commissioning / BCAR / Handover;</li> <li>• Basement Fit Out;</li> <li>• Landscaping and External Works</li> </ul>



**Figure 3.32: Proposed Phasing Plan Layout demonstrating Construction Accesses (Red Hatch Line Delineates Phases 3 and 4)**

**(Source: Lafferty Project Managers, 2021)**

The typical working hours are proposed to be 07:00 to 19:00 Monday to Friday (excluding bank holidays) and 09:00 to 13:00 Saturdays, subject to any condition attached in a grant of permission. No work will take place on Sundays and Public Holidays. Subject to the agreement of the Local Authority, out of hours working may be required for water main connections, foul drainage connections etc.

### 3.5 Cumulation with Other Projects

Any potential cumulative impacts have been considered in the preparation of this EIAR and are detailed where relevant in the various EIAR Chapters. At the time of writing this Environmental Impact Assessment Report, we note the following relevant applications, some of which are in the administrative area of Dun Laoghaire-Rathdown County Council. This list of planning applications has been reviewed and considered by the authors of each EIAR Chapter and included in the cumulative assessment where deemed appropriate.



**Granted:**

	<b>Planning Reference</b>	<b>Development and Location</b>	<b>Date Granted</b>
1.	ABP Reg. Ref. PL29S.307267	148 No. Unit Residential Development  Eglinton Road, Donnybrook, Dublin 4	<b>ABP Decision Date:</b> 31 <sup>st</sup> August 2020
2.	DCC Reg. Ref. 2189/20  ABP Reg. Ref. PL29S.307375	36 No. Unit Residential Development  Sandford Lodge, Sandford Road, Dublin 6	<b>Decision Date:</b> 11 <sup>th</sup> March 2021  <b>ABP Grant:</b> 27 <sup>th</sup> March 2020
3.	DCC Reg. Ref. 3301/20  <i>Currently Under Appeal</i>  ABP Reg. Ref. ABP-309378-21	100 No. BTR Unit Shared Accommodation  Nos. 22-24 Donnybrook Road, Kiely's Pub, Donnybrook, Dublin 4	<b>Granted:</b> 13 <sup>th</sup> January 2021  <b>ABP Decision Due:</b> 10 <sup>th</sup> June 2021 (Not yet made)
4.	DCC Reg. Ref. 2115/19	203 No. Bed Student Accommodation  Alexandra College, Richmond Avenue South, Milltown, Dublin 6	<b>Granted:</b> 20 <sup>th</sup> March 2019  <b>Final Grant:</b> 25 <sup>th</sup> April 2019
5.	DCC Reg. Ref. 3907/18	Works at Alexandra College, Richmond Avenue South, Milltown, Dublin 6  (including construction on a new internal campus road, relocation of existing car and coach parking, provision of additional bicycle parking spaces and the provision of improvement works to the campus entrance on Milltown Road to include a set-back gateway)	<b>Granted:</b> 25 <sup>th</sup> January 2019  <b>Final Grant:</b> 5 <sup>th</sup> March 2019
6.	DCC Reg. Ref. 3513/20  ABP Reg. Ref. ABP-309720-21	Mixed Use Development of 49 No. Build-to-Rent units and 231 sq m retail space	<b>Granted:</b> 24 <sup>th</sup> February 2021  <b>Final Grant:</b> 26 <sup>th</sup> May 2021 (Appeals Withdrawn)

		Nos. 25-27 Donnybrook Road and Nos. 1-3 The Crescent, Donnybrook, Dublin 4	
7.	DCC Reg. Ref. 2124/20	Single storey extension (c. 120 sq m) to the south of the existing school to provide additional canteen facilities  Muckross Park College, Marlborough Road, Dublin 4	<b>Granted:</b> 20 <sup>th</sup> March 2020  <b>Final Grant:</b> 29 <sup>th</sup> June 2020
8.	No. 1. DCC Reg. Ref. 2582/16  No. 2. DCC Reg. Ref. 3312/20	Demolition of existing sheds (c. 25 sq m) and construction of 4 No. detached houses  No. 91 Belmont Avenue, Donnybrook, Dublin 4  Revised ground floor rear extension to include a single storey rear return for a utility room  No. 91 Belmont Avenue, Donnybrook, Dublin 4	<b>Granted:</b> 8 <sup>th</sup> August 2016  <b>Final Grant:</b> 16 <sup>th</sup> September 2016  <b>Granted:</b> 28 <sup>th</sup> October 2020  <b>Final Grant:</b> 9 <sup>th</sup> December 2020
9.	DCC Reg. Ref. WEB1065/19  ABP Reg. Ref. ABP-304727-19	New 3g artificial turf pitch capable of accommodating full size rugby and football over the site on an existing natural grass pitch within the playing fields  Gonzaga College, Sandford Road, Ranelagh, Dublin 6	<b>Granted:</b> 31 <sup>st</sup> May 2019  <b>Final Grant:</b> 9 <sup>th</sup> October 2019
10.	DCC Reg. Ref. 3159/17  ABP Reg. Ref. ABP-300024-17	Revision to DCC Reg. Ref. 2308/16 to increase the total apartment units from 96 No. to 116 No.  Lands at the former Paper Mills site, bounded by the River Dodder to the East, Clonskeagh Road to the West, Clonskeagh Bridge to the South-West, Dublin 6	<b>Granted:</b> 27 <sup>th</sup> September 2017  <b>Final Grant:</b> 4 <sup>th</sup> July 2018
11.	DCC Reg. Ref. 3144/18	Demolition of the existing Anglesea Stand and Anglesea	<b>Granted:</b> 24 <sup>th</sup> July 2018

		<p>Terrace structure (c. 7,716 sq m), 'lean-to' open fronted shed bounding Simmonscourt Road (approx. 145 sq m) and removal of modern terrace (approx. 44sq m) area surrounding the clock tower (a protected structure). Provision of a new grandstand (7,332.2 sq m) over 3 levels, 21.3 m [26.8 m OD] in height (with associated floodlighting and acoustic public address within roof of new stand) with a connection (via a glazed bridge link at level 01) to the pocket building of (1,204.3 sq m GFA) comprising a 2 level (storey) 9.91 m [15.41 m OD] in height building with plant (89 sq m) at roof level (within a louvered cover - overall height 10.66 m 16.12 m OD)) to the east.</p> <p>Site within the overall RDS Lands, Ballsbridge, Dublin 4</p>	<p><b>Final Grant:</b> 31<sup>st</sup> August 2018</p>
12.	<p><b>DCC Reg. Ref. 2189/20</b></p> <p><b>ABP Reg. Ref. ABP-307375-20</b></p>	<p>Demolition (c. 392 sq m) of Block 5 (1 storey) and Block 6 (1 storey) (total 4 No. units) and the construction of 36 No. residential units in the form of 2 No. three storey terraces</p> <p>Lands at Sandford Lodge, Sandford Close, Sandford Road, Dublin 6</p>	<p><b>Granted:</b> 27<sup>th</sup> March 2020</p> <p><b>Final Grant:</b> 11<sup>th</sup> March 2021</p>
13.	<p><b>DCC Reg. Ref. 2244/21</b></p> <p><i>Currently on Appeal under:</i></p> <p><b>ABP Reg. Ref. ABP-310204-21</b></p>	<p>Demolition of structures on site and construction of a 12 No. storey development including 84 apartments with retail and café/restaurant (570 sq m)</p> <p>Junction of Donnybrook Road and Brookvale Road, Donnybrook, Dublin 4, D04 K3T8</p>	<p><b>Refused:</b> Refused by DCC on 14<sup>th</sup> April 2021</p> <p><b>ABP Decision Due Date:</b> 13<sup>th</sup> September 2021</p>
14.	<b>DCC Reg. Ref. 3939/19</b>	The demolition of the existing Rectory and the construction of 9 No. dwellings	<b>Granted:</b> 19 <sup>th</sup> February 2020

	<b>ABP Reg. Ref. ABP-306755-20</b>	The Rectory, Purser Gardens, Rathmines, Dublin 6, Do6 EoY5	<b>ABP Grant:</b> 9 <sup>th</sup> September 2020
15.	<b>DCC Reg. Ref. 4011/18</b>  <b>ABP Reg. Ref. ABP-304085-19</b>	The demolition of all buildings on the former commercial site to the rear and the construction of a new residential development comprising 20 No. residential houses  No. 1 Annesley Park, Dublin 6	<b>Granted:</b> 4 <sup>th</sup> March 2019  <b>ABP Grant:</b> 4 <sup>th</sup> November 2019
16.	<b>DCC Reg. Ref. 2812/20</b>	Demolition of existing single storey structures to the side and rear. - Construction of single storey rear extension to the side and rear of the existing dwelling  No. 23 Bushfield Terrace, Donnybrook, Dublin 4, Do4 V2RO	<b>Granted:</b> 29 <sup>th</sup> July 2020  <b>Final Grant:</b> 9 <sup>th</sup> September 2020
17.	<b>DCC Reg. Ref. 2412/19</b>  <b>ABP Reg. Ref. ABP-305475-19</b>	The construction of a residential scheme arranged in 3 No. new three-four storey blocks with habitable attic accommodation at a site at  The former Donnybrook Laundry at The Crescent, Donnybrook, Dublin 4, Do4 R856 and No. 17 The Crescent, Donnybrook Road, Dublin 4 Do4 A6Y7	<b>Granted:</b> 22 <sup>nd</sup> August 2019  <b>ABP Grant:</b> 29 <sup>th</sup> January 2020
18.	<b>DCC Reg. Ref. 2731/21 (alterations to DCC Reg. Ref. 3890/14 extended by DCC Reg Ref. 3890/14/X1-4 No. bedroom dwelling)</b>	Development comprising provision of a pedestrian entrance gate off Eglinton Road; (ii) provision of a temporary construction access off Eglinton Road; and (iii) all ancillary works necessary  No. 1 Eglinton Square, Donnybrook, Dublin 4, Do4 E2W2	<b>DCC Decision:</b>  Split decision 29 <sup>th</sup> June 2021 – Grant proposed pedestrian entrance gate and refuse proposed temporary construction entrance.
19.	<b>(SHD) ABP Reg. Ref. ABP-310138-21 (<a href="http://www.msmshd.ie">www.msmshd.ie</a>)</b>	Demolition of existing buildings on site and part of the granite wall along Dundrum Road, excluding Small Hall and the	<b>ABP Decision Date:</b> 25 <sup>th</sup> August 2021



	<p>construction of 231 No. apartments and a childcare facility</p> <p>Mount Saint Mary's and Saint Joseph's, Dundrum Road, Dundrum, Dublin 14</p>	
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### Pending:

	Planning Reference	Development	Date Granted
1.	DCC Reg. Ref. 2843/21	<p>Construction of Donnybrook Primary Care Centre comprising 4 No. storeys over basement level accommodating HSE medical diagnostics, consulting and treatment rooms plus ancillary offices</p> <p>The Royal Hospital Donnybrook, Morehampton Road, Donnybrook, Dublin 4, D04 HX40</p>	<p><b>DCC Decision:</b> Further Information Received 25<sup>th</sup> August 2021</p> <p>Decision due 21<sup>st</sup> September 2021</p>
2.	DCC Reg. Ref. 2477/21	<p>The demolition of a single storey rear return and provision of 2 No. residential units; and the provision of a new part 2 to part 4 No. storey structure to the rear of the site accommodating 10 No. residential units</p> <p>No. 47 Ranelagh Road, Ranelagh, Dublin 6</p>	<p><b>DCC Decision:</b> (Further Information Requested 20<sup>th</sup> May 2021)</p>
3.	DCC Reg. Ref. 2762/21	<p>Construction of an additional storey consisting of an additional 2-bedroom apartment at third floor level, with private balconies. There will be an increase in units from 6 to 7 No. apartments</p> <p>Nos. 47-48 Chelmsford Road, Ranelagh, Dublin 6</p>	<p><b>Refused:</b> 5<sup>th</sup> July 2021</p> <p><b>Appealed to ABP:</b> Decision due 2<sup>nd</sup> December 2021</p>
4.	DCC Reg. Ref. 2704/21	<p>Construction of 64 No. Build-to-Rent apartment units comprising 19 No. studio</p>	<p><b>DCC Decision:</b></p>

	apartments, 41 No. one bedroom apartments and 4 No. two bedroom apartments  St. Mary's Home, Pembroke Park and No. 28A Clyde Lane, Dublin 4	(Further Information Requested 24 <sup>th</sup> June 2021)
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### 3.6 Dependency on Other Projects

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

We reiterate the following from Section 3.4.5 as set out by DBFL Consulting Engineers:

*'Provision of on-site surface water drainage infrastructure which discharges from the site along its south-eastern boundary via Milltown Road and the junction of Milltown Road / Sandford Road prior to discharging to the existing public surface water drainage network in Eglinton Road (300mm diameter pipe extending approximately 300m from the developable site boundary to the outfall location).*

*The public surface water network on Eglinton Road is expected to provide a suitable surface water discharge point for the proposed development. However, in order to achieve the required drainage invert levels on site, approximately 160m of the existing drainage network along Eglinton Road will need to be replaced with a 300mm pipe running at a flatter gradient. The proposed surface water drainage network will collect surface water runoff from the site via a piped network'.*

A Letter of Consent has been received from Dublin City Council for these works.

## 4.0 EXAMINATION OF ALTERNATIVES

### 4.1 Introduction

This chapter of the EIAR sets out the reasons why the proposed layout was chosen and provides details of alternative layouts considered throughout the design process. In addition, this chapter discusses the do-nothing alternative, alternative locations, alternative processes and alternative mitigation measures associated with the proposed development. This is in accordance with Annex IV (2) of the amended EIA Directive (2014/52/EU), which notes that the following is required in relation to the consideration of alternatives in the preparation of an EIAR:

*'A description of the reasonable alternatives studied by the person or persons who prepared the EIAR, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the proposed development on the environment.'*

Article 94, Schedule 6, paragraph 1(d) of the Planning and Development Regulations 2001, as amended requires the following information:

*'(d) A description of the reasonable alternatives studied by the person or persons who prepared the EIAR, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the proposed development on the environment.'*

### 4.2 Qualifications and Experience

This chapter of the EIAR was prepared by Patricia Thornton (Thornton O'Connor Town Planning), Derek Murphy (O'Mahony Pike Architects) and Brendan Keogh (DBFL Consulting Engineers).

Patricia Thornton (BSc. Surv) (MRUP), Director of Thornton O'Connor Town Planning, is a Corporate member of the Irish Planning Institute and has 18 No. years post-qualification experience. Patricia has experience in preparing and coordinating EIARs for a variety of projects and has also been involved in the coordination of a wide range of developments including residential and commercial developments

Derek Murphy (BA Hons, Dip. Arch, BEAM Pro) (MRIAI, RIBA, HKIA Assoc), Associate Director of O'Mahony Pike Architects is a Practice member of the Royal Institute Architects Ireland and has 23 No. years post-qualification experience. Derek has experience in preparing and coordinating EIARs for a variety of projects and has also been involved in a wide range of developments including residential, hospitality, tourism, and large mixed-use commercial developments.

Brendan Keogh (Associate Director Civils DBFL Consulting Engineers) is a Chartered Professional Engineer (BA BAI PGradDip CEng MIEI) with over 15 No. years' experience in the design and construction of civil engineering projects. Projects have included works associated with the commercial, industrial, energy, residential and public infrastructure sectors.

### 4.3 Legislative Context and Guidelines

The preparation of this chapter has had regard to the following:

- *Environmental Impact Assessment of Projects – Guidance on the preparation of the Environmental Impact Assessment (Directive 2011/92/EU as amended by 2014/52/EU) (European Union, 2017);*
- *Guidelines on the Information to be Contained in Environmental Impact Statements (Environmental Protection Agency (EPA), draft August 2017); and*
- *Planning and Development Regulations, 2001 (as amended).*

Annex IV (2) of the amended EIA Directive (2014/52/EU) notes that the following is required in relation to the consideration of alternatives in the preparation of an EIAR:

*'A description of the reasonable alternatives studied by the person or persons who prepared the EIAR, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the proposed development on the environment.'*

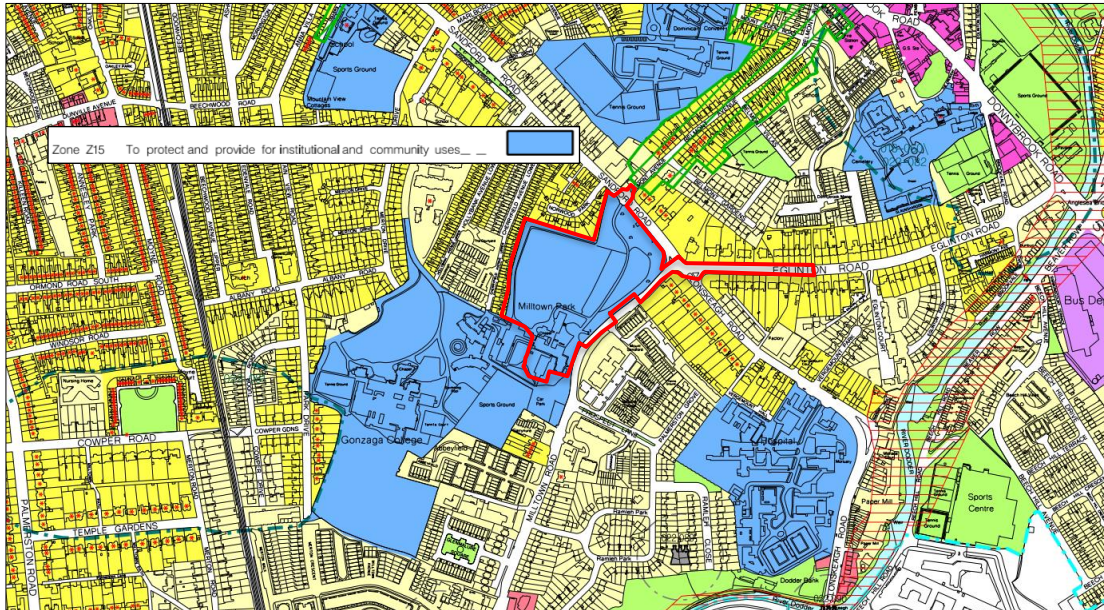
## 4.2 Justification for the Proposed Development

### 4.2.1 Site Description and Zoning Objective

The proposed development principally comprises the construction of 671 No. residential units (604 No. Build-to-Rent and 67 No. Build-to-Sell), a creche and ancillary resident amenities and facilities. A fully comprehensive description of development is provided in Chapter 3 of this EIAR.

We note that the subject site is zoned Z15 *'Institutional and Community'* in the *Dublin City Council Development Plan 2016-2022* where the stated aim is *'to protect and provide for institutional and community uses'*. Please see Figure 4.1 below with the subject application site annotated indicatively in red, noting that the road and infrastructure works proposed on Milltown Road, Sandford Road and Eglinton Road are also outlined in red.





**Figure 4.1: Zoning Map with Subject Site Outlined Indicatively in Red**

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

Under this zoning, residential use is open for consideration and a creche is a permissible use.

Full details in relation to the Z15 zoning of the site are provided in Section 6.0 of the Planning Report by Thornton O’Connor Town Planning and Sections 2.1 and 2.2 of the Response to ABP Opinion by Thornton O’Connor Town Planning.

#### 4.2.2 ‘Do Nothing’ Alternative

In the event of a ‘do nothing scenario’ the site would continue to remain in its current underutilised state which would represent an inefficient use of scarce core urban land within an existing built-up area. The application site currently comprises the original Milltown Park House with subsequent extensions, which are vacant and no longer in use, in a highly accessible core urban location in Dublin in close proximity to high frequency public transport and employment locations. The existing plot ratio of the developable site (c. 4.26 Ha) is 0.12 and the proposed plot ratio of the development site is 1.29, which represents efficient densification of core urban lands.

In addition, we note that the site was historically (and is currently) closed up from the public as the site has always been in private use. Therefore, if the development did not proceed, the site would not be opened up to the public and the extensive public open space representing 34.9% of the site and permeable links incorporated into the scheme layout would not be provided for the wider community to utilise. The development would welcome the public through the site and would become a gathering place for the community for the first time. Therefore, if the development does not proceed this would be considered a negative impact.

In conclusion, the proposed development will provide much needed housing units in an existing residential area in addition to a creche. If the development does not proceed, this

would represent a lost opportunity to provide accessible public open space for the community as well as housing (i.e. 671 No. households would not be catered for).

### 4.3 Consideration of Alternatives

#### 4.3.1 Alternative Locations

The overarching vision of the Applicant and the Design Team since the outset of the project has been to develop a high-quality scheme on appropriately zoned, serviced land.

When acquiring the site, the Applicant duly considered the zoning objective pertaining to the lands which are zoned Objective Z15 'Institutional and Community' in *the Dublin City Development Plan 2016 – 2022*, where 25% public open space is required, beyond the standard 10% typically required for a residential development on lands within the administrative area of Dublin City Council. In addressing the particular characteristics of the site, namely a large volume of vacant institutional buildings, a key requirement early in the design process was to determine which buildings could be functionally retained and reused within the development. In addition, the requirement for 25% public open space has been provided in line with the Z15 zoning objective pertaining to the lands, opening up these lands for the first time to the public as the lands have always been walled and gated and in private use by the Jesuit Community and closed off from the public.

The development layout was framed around these key design considerations. In addition to the large quantum of open space provided, the residential development now proposed has utilised the remainder of the site to provide a range of residential units and tenures as detailed extensively throughout this Chapter and application documentation.

Having regard to the core urban location of the site in proximity to high-frequency public transport, employment locations, services and facilities, the location of the lands within a built-up area, the sequential approach to development and the zoning objective of the subject site pertaining to the lands, alternative locations were not considered. Section 3.4.1 of the *Draft EPA Guidelines 2017* state that '*in some instances some of the alternatives... will not be applicable - e.g. there may be no relevant 'alternative location...'*' The size of the site and the site's location close to the urban core, public transport and services and facilities has influenced the site's principal residential use along with the scale, height, and massing considered appropriate for the subject site.

#### 4.3.2 Alternative Layouts

The scheme has been designed by OMP Architects and is presented in the Architectural Drawings, Masterplan & Architectural Design Statement, Response to ABP + DCC Opinion and Existing Buildings Feasibility Report which should be read in conjunction with this Chapter of the EIAR.

The proposed scheme which is guided by current national, regional and local policy will appropriately assimilate into the surrounding context to provide a sustainable residential development in close proximity to public transport, services, facilities and employment locations.

In summary, the proposed layout of the scheme has fully considered the site's surrounding context by positioning the lower heights along more sensitive boundaries, to the highest forms which are positioned at the least sensitive locations such as fronting Milltown Road and Sandford Road, fronting the public park, and towards the centre and southern portions of the subject lands.

Having regard to large extent of the subject lands and the location of the lands in close proximity to public transport and a wide range of services and facilities, it is considered that the design response provides a contemporary architectural solution that maximises the development potential of the subject lands in the interests of sustainable development. The design has sought to respond to the locational characteristics of the site, proximate to a mix of low density houses and apartment blocks and yet provide a development that also responds to the site characteristics and opportunities presented by a very large underutilised plot that is positioned at a key prominent intersection between Milltown, Clonskeagh, Donnybrook and Ranelagh.

The subject layout has evolved since the initial design stage subsequent to a significant number of design team meetings and in response to pre-planning meetings with Dublin City Council and An Bord Pleanála. Please see below the earlier design iterations for the subject lands prepared by O' Mahony Pike Architects:

#### ***4.3.2.1 Various Design Iterations Proposed Throughout the Design Process***

A key design consideration at the beginning of the process was to determine which buildings could be functionally retained and reused within the development. Once it was established which buildings could be functionally reused, the next stage of the masterplan was to ensure that adequate public open space could be provided in line with the Z15 zoning requirement, opening up these lands for the first time to the public as the lands have always been walled and gated and in private use by the Jesuit Community and closed off from the public.

The development layout was principally framed around these key design considerations. In addition to the large provision of open space, the residential development now proposed has utilised the remainder of the site to provide a range of residential units and tenures.

Figure 4.2 below demonstrates the existing buildings at the subject site which are all connected:



**Figure 4.2: Outline of Building Range Which Identifies the Building Elements**

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

Options A to D below demonstrates that the potential for the reuse of existing buildings was duly considered in the design process. The Finlay Wing was noted for removal early in the design process for reasons such as the following in summary:

- Both levels of the Finlay Wing are only connected by a long route through original Milltown Park House which confuses circulation;
- Due to the units not stacking vertically from floor to floor there would be an impact on the layouts as there would be 2 No. sets of services running in different locations through the units, which would reduce their usable area;
- Windows would require upgrading and external walls would need to be retrofitted with insulation which would further reduce the floor area;
- Lower-level floor to ceiling height of 2.6m is below minimum required of 2.7m at ground floor and would be reduced further with introduction of service zone and fire rating to ceiling soffit;
- Long term flooding at basement level has compromised the fabric; and
- Daylight on the lower level is impacted by the basement setting - 2m wide trench around most of the building.

O' Mahony Pike Architects comprehensively considered the opportunity to reuse the existing buildings within the development which is fully detailed in the 'Existing Buildings Feasibility' Report which is included as an Appendix to the OMP Design Statement enclosed separately. This EIAR Chapter has included principal details from this Feasibility Study that were considered when determining which existing buildings could be appropriately and functionally reused within the development.



**Option A – 600 No. units*****Design Approach***

The first design approach/response to the site consisted of the following key elements and strategy:

- The development layout comprised a mix of retention and new build elements.
- Requirement to provide 25% public open space on the lands in accordance with the Z15 zoning objective.
- Retention of mature tree belt and woodland park as a key site asset forming the Eastern portion of the lands.
- Definition of the public open space and park edge by a predominantly 5 No. storey linear apartment blocks running north/south and anchoring the existing Sandford road entrance to the north.
- An assembly of apartment buildings of predominantly 5 No. storeys in height at the centre of the development forming a communal courtyard. In addition, a 10 No. storey mid-rise block was provided to add legibility and act as a focal point upon arrival.
- Provision of 3 No. storey housing to the north and western edges interfacing with existing residential development and a 4 No. storey apartment block to the south-west corner.
- Access and traffic strategy consisted of retention and re-use of the existing entrance off Sandford Road and the proposed provision of an alternative, new vehicular and pedestrian access off Milltown Road to the East. These access points were connected by way of a continuous internal 'loop' road around the perimeter of the site.



**Figure 4.3: Option A**

(Source: OMP Architects)

#### **OMP Commentary**

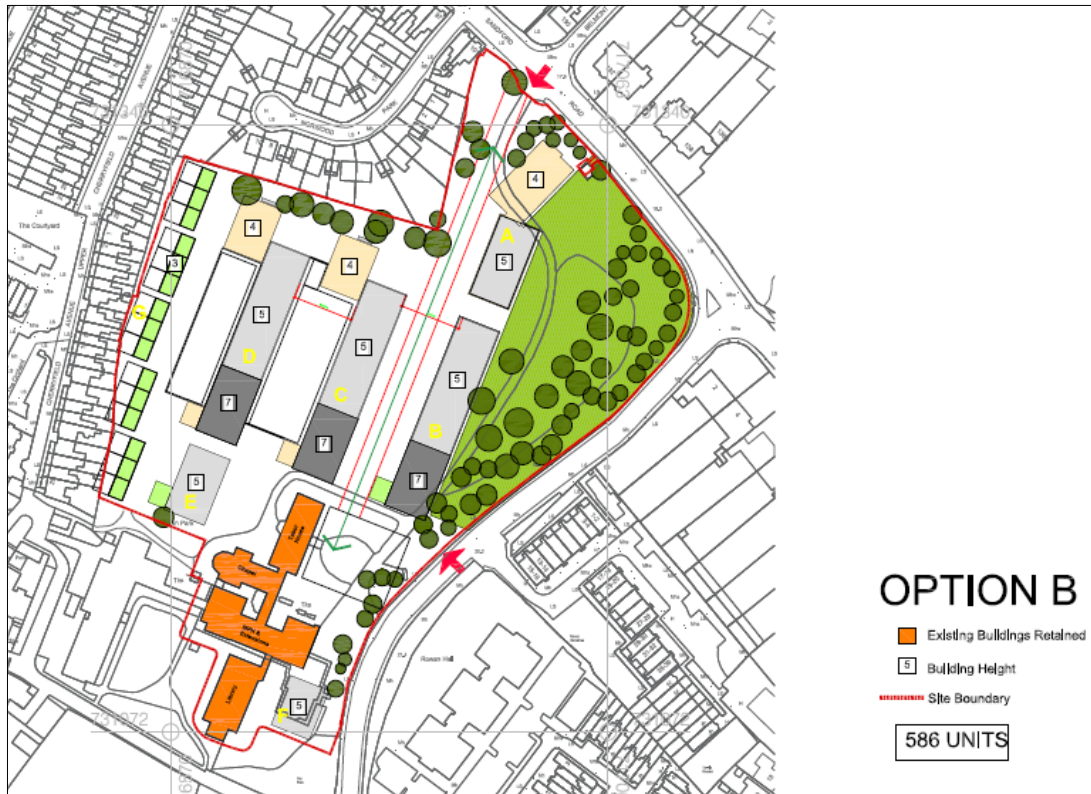
The following considerations required further analysis and appropriate solutions in the design iteration and development process:

1. The building forming the public park edge required further articulation and variation in massing. It also segregated the park at the northern edge and limited permeability and connectivity through the site from Milltown Road to Sandford Road.
2. The sense of arrival and placemaking at the centre of the scheme was weak. The configuration also lacked legibility and integration of pedestrian and cycle movement and a hierarchy of landscape open spaces through the development.
3. The intensification of development at the centre was abrupt and lacked character while creating a barrier to pedestrian and cycle movement though the site.
4. It was considered that the layout of the apartment blocks would provide an unnecessary number of single aspect, north facing units due to the block configuration and orientation.
5. The proposed housing element along the northern boundary was considered to needlessly impact on existing trees requiring removal.
6. The continuous outer 'loop' road made for a car dominated environment and promoted too much emphasis on car movement while acting as a potential short-cut for cars from Milltown Road to Sandford Road causing traffic impact concerns.

**Option B – 586 No. units*****Design Approach***

The alternative Option B layout consisted of the following key elements and strategy:

- Retention of mature tree belt and woodland park as a key site asset forming the eastern portion of the lands. The housing element along the northern edge was removed in order to retain existing trees.
- Rearrangement of the central element and the provision of north/south linear blocks providing enhancements to daylight access to units and minimisation of north facing single aspect units.
- A key first principle was to provide a stronger focus on the north/south access connecting the Sandford Road entrance with the forecourt space to the front of Tabor House and the cluster of existing, historic buildings. This north/south access is annotated by the green arrow in the diagram.
- The removal of the internal perimeter road reduced traffic movement and allowed the design to shift to a more pedestrian orientated environment, whilst opening up more opportunities for permeability and connectivity through the development and the Z15 lands to the south.
- Opportunities for a series of 'pop-up' elements on the roofscape to the south end of the proposed blocks were explored to provide additional height while minimising potential impacts on existing residential areas.



**Figure 4.4: Option B**

(Source: OMP Architects)

#### ***OMP Commentary***

The following considerations required further analysis and appropriate solutions in the design iteration and development process:

1. The building forming the public park edge required further articulation and variation in massing. It also segregated the park at the northern edge and limited permeability and connectivity through the site from Milltown Road to Sandford Road.
2. The development of a hierarchy and sequence of internal and connecting public and communal open spaces was required in order to provide permeability and to define character areas within the development.
3. Further consideration of the interface with the northern edge onto Norwood Park was required in relation to secondary apartment block locations, separation distances and potential privacy issues.



### Option C - 534 No. units

#### Design Approach

Alternative Option C consisted of the following key elements and strategy:

- Provision of a perimeter courtyard block at the centre with part basement/podium parking. Height gradation and massing of this element provided a modulation and variation in height and form while also enhancing good sunlight access to the space.
- Vehicular access provided to housing along the Western edge and terminating in a cul de sac thereby developing a “homezone” type environment along this street.
- The articulation and massing of the apartment blocks was better considered forming the edge to the woodland public open space with height variation introduced and expansion of woodland park to the north connecting with the Sandford Road entrance. In addition, an east/west connection is provided to improve permeability and ease of access to the park for all residents.



Figure 4.5: Option C

(Source: OMP Architects)

#### OMP Commentary

The following considerations required further analysis and appropriate solutions in the design iteration and development process:

1. The enriching of the layers of landscape spaces and social elements/facilities to inform a stronger sense of place.
2. Better articulation of the block addressing the Sandford Road entrance and increased separation distances to residential properties on Sandford Road.
3. Further consideration of the public park edge to the north near the Sandford Road entrance.

#### **Option D - 540 No. units**

#### ***Design Approach***

Alternative Option D consisted of the following key elements and strategy:

- Further retention of mature tree belt and woodland park as a key site asset forming the eastern portion of the lands and provision of increased open space area.
- Reconfiguration of Block A along the woodland park edge to the east. The building form is cranked at an angle to address and respond to the junction between Eglington Road, Sandford Road and Milltown Road. This also allows for the provision of a public square/pocket park/plaza contained by the building to its western edge and creates a positive sense of place upon arrival from Sandford Road.
- The north/south access road is developed as a pedestrian tree lined street or avenue connecting the arrival square to the north with the historic forecourt to the south. Car movement is therefore removed from this street enhancing pedestrian and cycle movement and permeability. The integration of social spaces such as tenant facilities around the public square to the north activate this space.
- A 13 No. storey mid-rise element is extruded from the linear A block to provide a 'visual marker' to respond to the wider context and prominent junction as well as acting as a marker to anchor the public square within the site and this intersection of pedestrian and cycle movement around the public park.

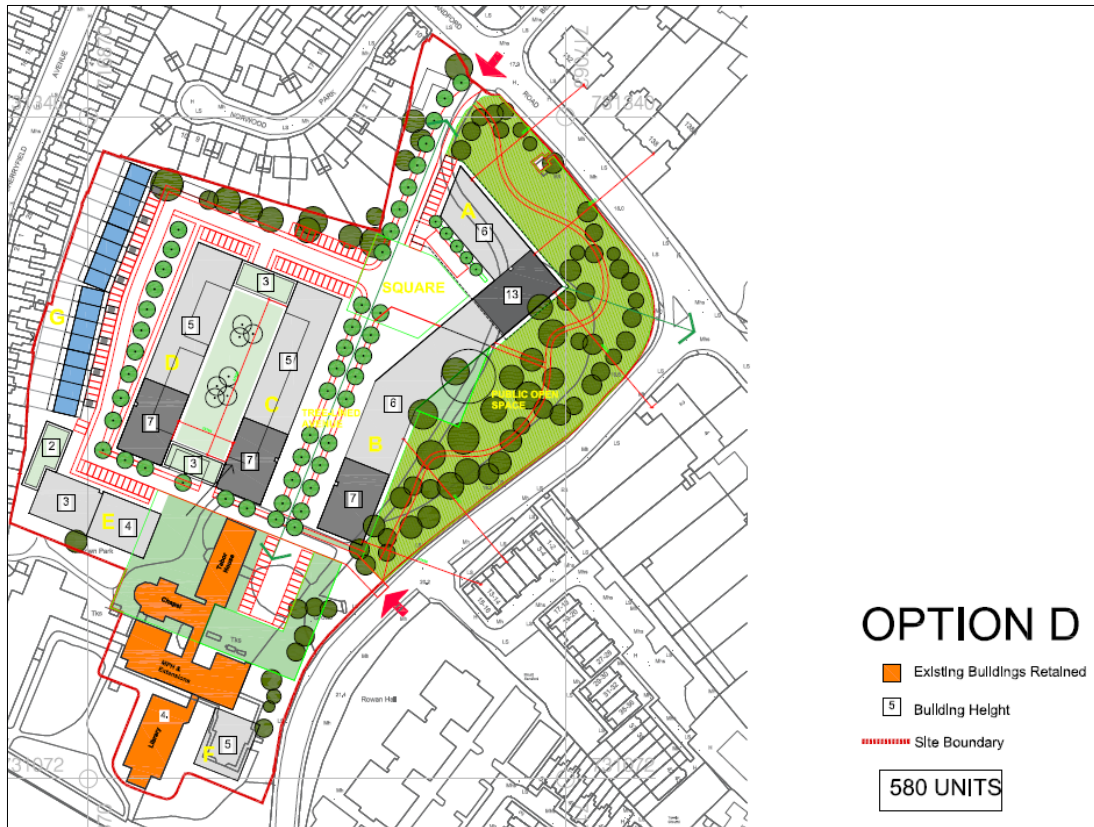


Figure 4.6: Option D

(Source: OMP Architects)

#### *OMP Commentary*

The following considerations required further analysis and appropriate solutions in the design iteration and development process:

1. Improved connectivity and further reduction of car movement within the site.
2. Further articulation of Block A to allow for the large 'Cedar' tree to be retained and become a key focal point at the triple storey archway connection between the public park and the public plaza.
3. More detailed consideration and assessment of the existing historic buildings and associated external 'in-between' spaces to be rationalised to improve the overall quality of the masterplan and proposed residential environment.

### Summary of Options A – D

During the design iterations outlined in Options A-D, the potential re-use of all existing buildings was studied within the current interlinked grouping. As this building grouping is not protected and no associated dispensation are facilitated, OMP Architects took into account all of the statutory regulations which will have to be complied with including fire safety and DAC (Disability Access Certificate) requirements etc. OMP also considered the 'permitted in principle' and 'open for consideration' uses that are allowed under the site's Z15 zoning, which is quite limited.

These studies raised challenges which became apparent during the detailed analysis of the existing buildings, and subsequently further options (Option E and F below) were developed with the functional reuse and refurbishment of the Chapel and Tabor House incorporated into the development.

In summary, Milltown Park House and Extensions were discounted from the scheme layout due to the extensive re-modelling of interior fabric that would be required to bring the building in line with current regulations and level access may not have been possible. Residential units and the possibility of providing a hotel were considered at the early design stage. The extensive remodelling would have provided c. 60 No. hotel rooms (not accounting for facilities/back of house) which was not considered viable. In relation to residential units, the issues with bringing the building in line with current regulations and providing level access in addition to the limited scope to provide private amenity and fire concerns over the enclosed courtyard behind the chapel all rendered the reuse of the building unviable and would essentially result in a new skin 'within an old shell' as so much of the existing fabric would be dramatically altered.

The Finlay Wing was discounted early in the design process as discussed previously, for example, due to confused circulation, floor to ceiling heights, daylight to the lower level and the units are not stacked so service shafts would impact internal layouts.

The Archive was considered for residential units in addition to shared living and hotel use. All three uses for the archive have major limitations due to:

- limited floor to ceiling heights;
- remote location within the site;
- narrow floor plate due to atrium;
- building fabric upgrade required;
- upgrades required by standards; and
- scale of potential development is not viable.

Major interior alterations would be required to bring this building in line with current regulations and with a total of 14 No. residential units with limited daylight and reduced heights in upper floors, this was not considered viable. Due to major interior alterations required to provide a total of 22 No. shared living units, this option is not viable for an operator due to the small scale. It is also noted that since the introduction of the *Apartment Guidelines, 2020*, this use no longer generally permitted. In relation to a proposed hotel use, major interior alterations would be required and the area for back of house is limited. There would be no proper drop off area for a hotel in this location and with only 18 No. rooms, the scale is not viable.

We also note that fire consultants for the development have advised that:

*'Tabor House and the Chapel layout would generally be easier to adapt to residential / amenity use...The other existing buildings have a number of issues in terms of fire strategy. Principally the layout is more difficult with a number of change of levels, which wouldn't be compliant for means of escape. Additionally the location of the buildings from fire tender accessibility would in our opinion require a significant redesign (including existing stair core locations), in order to develop a fire strategy.'*

The adopted approach for reusing Tabor House and the Chapel intends to create a new setting in the landscape for Tabor House and the Chapel, which are now considered as a focal point within the overall development. The removal of the Archive aims to consolidate the green space in front of the Jesuit 'red brick' building creating a walled garden to the rear of the new Block F. A study on extending the site to the south (red shaded area on Figure 4.7 below) to connect to existing Jesuit entrance (outside of the application lands), but this was not pursued as land is not being sold by the Jesuits.



**Figure 4.7: Study of Potential Extension of Application Lands to the South (However Not Available for Purchase)**

(Source: OMP Architects)

The following are considered as benefits to improve the overall quality of the masterplan and proposed residential environment:

- The opportunity to showcase the 2 No. characterful buildings of Tabor House and the Chapel which are detachable from the grouping;
- The opportunity to reinforce both Tabor House and the Chapel as focal points placed in a new landscape setting;
- Architectural merit given clarity in form and fenestration and the overall quality of building fabric;
- The stripping away of buildings from around the Chapel and Tabor House will allow them to breathe and to be seen and appreciated by the public and future residents;



- The 2 No. buildings to be repurposed become a focal point within the new masterplan layout and are further activated by adding the newly proposed entrance off Milltown Road which links these historic buildings back into the existing urban structure;
- Tidying up southern edge providing new form (Block F) to enclose the forecourt space and act as a backdrop to north/south avenue and vista from Sandford Road; and
- Tabor House and the Chapel will require upgrading but can be favourably adapted to residential and amenity uses.

### Option E – 714 No. units

#### *Design Strategy*

The alternative Option E layout ultimately became the baseline masterplan and consisted of the following key elements and strategy:

- The Milltown Road entrance would be the primary access point for cars with the Sandford Road entrance limited to taxi, delivery and emergency access vehicles only and the access road terminated at the edge of the public plaza.
- Further articulation of Block A ensures that the large 'Cedar' tree is retained and becomes a key focal point at the triple height archway connection between the public park and public plaza. The building shape is informed by this feature tree in terms of the cranked building form in plan as well as the introduction of a series of setback levels in section which aim to provide generous outdoor terraces with views overlooking the park to the east and into the trees.
- The public open space and woodland park was extended to include the green space along the northern edge and a continuous pedestrian and cycle pathway formed a loop around the outer edges of the development connecting a variety of landscape character spaces and acting as a walking and exercise trail.
- Alternative routes through the central communal courtyard linked the public square/plaza and woodland park further south to a fruit garden to the rear of Tabor House, which also enhances the opportunity for future connectivity to the wider Z15 lands further south of the application site.
- Tabor House and the Chapel have been retained to form a 'set piece' at the entrance off Milltown Road. A new apartment block forms the southern edge helping to provide containment to the forecourt and an ordered arrangement and sense of formality upon arrival. This composition ensures that Tabor House and the Chapel become the focal point and form the strong backdrop to the end of the tree lined avenue as you arrive from the north off Sandford Road.
- Opportunities were sought to try and ensure that this highly accessible site is suitably densified, and the land resource is best served regarding future proofing for

a sustainable development. As such, apartment numbers increased from c. 580 No. units to c. 700 No. units including the proposed conversion and re-use of Tabor House and the Chapel within the development.



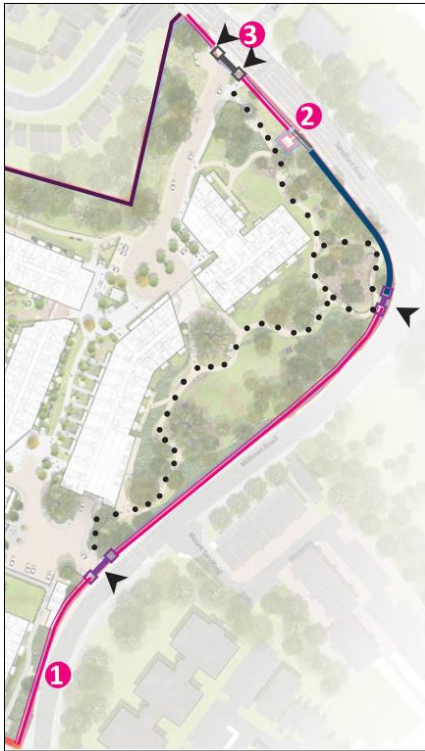
**Figure 4.8: Option E**

**(Source: OMP Architects)**

As part of the design process, the proposed modification of the imposing boundary wall was comprehensively considered. In order to enhance legibility and permeability in the area, it is considered that views should be provided into the site which would visually open up the site for the surrounding area.

Figure 4.9 below demonstrates the proposed boundary wall treatment for the north-eastern and eastern boundaries fronting onto Sandford and Milltown Road proposed under Option E. At present, the wall is imposing and does not offer any glimpses into the application lands.

Option F will demonstrate the revised boundary treatment now proposed as part of this subject SHD planning application. Figure 4.9 below demonstrates the Option E proposal (pink colour below highlights the boundary wall to be retained and the navy/blue show the portion of wall to be removed and replaced with an upstanding wall and railing).



**Figure 4.9: Boundary Treatment Strategy Fronting Sanford Road and Milltown Road Under Option E**

(Source: Cameo and Partners Design Studio, 2021)

This has been modified further to provide increased views into the subject site as discussed in Option F below.

Ultimately this overall Option E layout was moderately revised to form the design layout subject of this proposed application (see Option F below).

**Option F – 671 No. units-The Final Layout**

The final design (the chosen option) is informed by the examination of the various alternatives and is principally similar to Option E.

The principal changes incorporated into the scheme layout in Option E include the following:

- The 13 No. storey 'visual marker' building at the corner of the fronting the public park and plaza is reduced in height to 10 No. storeys. Upon further consideration, it was decided to reduce the 13 No. storey building which is considered 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.

The height is in line with the existing mature tree belt forming the eastern and northern boundaries and provides a 'green veil' to the site perimeter. It was felt that the reduced height and prominence would be more appropriate in scale as a 'local landmark'.

- Block A1 'visual marker' building was reduced in footprint by providing a larger setback to the northern boundary in order to enhance connectivity and continuity of flow for the public park along the east and connecting to the northern public open space (known as the Northern Tree Glade). A winding path is provided along the eastern fringe off the Sandford Road entrance and links with the public park, providing a continuous loop around the development as a walking and exercise trail.
- Further refinement of the public plaza included eliminating all car parking and vehicular movements and ensuring it functions as a public space for pedestrian and cycle movement and use only. The Sandford Road entrance itself will be a secondary entrance to the site, principally for taxis, set down and deliveries with a small element of mobility impaired parking and thus will have very minimal traffic movements. Access to the public plaza will be restricted by bollards. The plaza space is fronted by ground level tenant facilities and a co-working hub which activate it as a meeting and social point for residents, and a strong connection will be provided through the triple height undercroft of Block A to the public woodland park to the east. The total public open space provision on site is 34.9% of the site and communal open space provision at surface level is 12.8% providing a total of 47.7% public/communal open space across the site. The final alternative landscaping treatment for the plaza will ensure a high-quality and usable space for the public and residents to utilise.
- A childcare facility has been added to the ground floor of Block F with outdoor play area. The creche has ease of access and setdown within the forecourt off the new Milltown Road entrance. The 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). The majority of vehicular traffic from Milltown Road (92%-96%) will filter directly into the basement car parking via a ramp proximate to the site entrance (within c. 20 No. 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.

Some earlier versions such as Option A, provided a continuous outer 'loop' road which would have resulted in a car dominated environment while acting as a potential short-cut for cars from Milltown Road to Sandford Road.

- Further enhancement of dual aspect provision to increase the quantum of dual aspect units to 51%, despite the requirement of 33% dual aspect units to be provided. This resulted in adjustments to the layouts and massing. These changes improved the overall residential quality of the scheme and in particular the changes to the courtyard blocks increased the width and area of the central communal courtyard space between Blocks B and C.

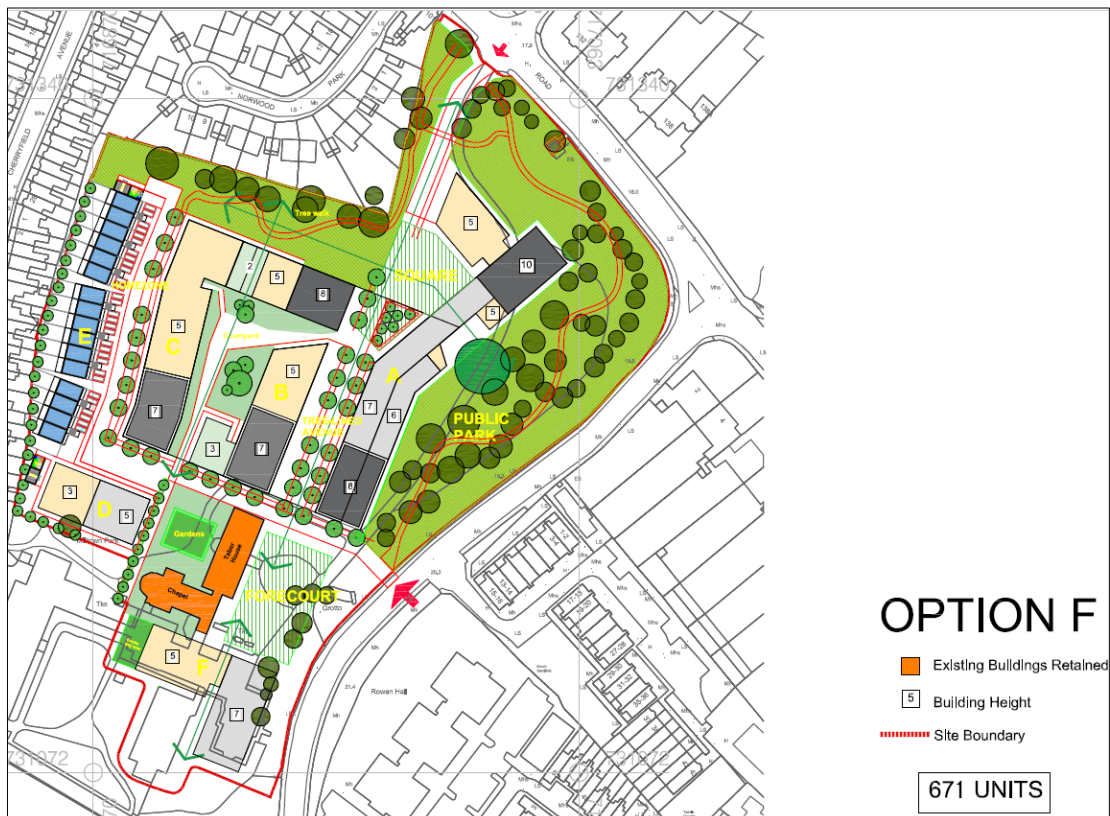
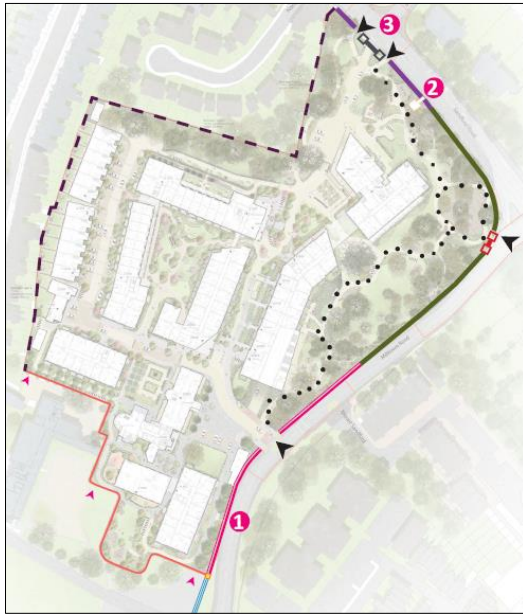


Figure 4.10: Option F

(Source: OMP Architects)

- It was decided to further enhance the boundary wall treatment fronting Sandford Road and Milltown Road to allow additional views into the site which would ensure that the opportunity to enhance legibility and permeability for the area was maximised. The pink colour and purple colour below highlights the boundary wall to be retained and the green colour shows the portion of wall to be removed and replaced with an upstanding wall and railing.





**Figure 4.11: Boundary Treatment Strategy Fronting Sandford Road and Milltown Road Now Proposed**

(Source: Cameo and Partners Design Studio, 2021)



**Figure 4.12: Illustrations of the Proposed Boundary Treatment at the Junction of Sandford Road and Milltown Road and New Pedestrian Entrance**

(Source: Cameo and Partners Design Studio, 2021)

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

Having regard to the reasons set out above, it is considered that the proposed development subject of this planning application is the optimum layout for the lands. The scheme as currently designed will appropriately densify these sustainable urban lands while also ensuring that appropriate transitions are provided from neighbouring properties. The height

of the Block A<sub>1</sub> was also reduced as it was considered that a more subtle intervention was needed at this junction while also still providing a focal point for the area. The final design of the public plaza will provide an improved and safer environment for residents and the public due to the removal of cars from the area.

### Summary of Design Strategy

The scheme design principally considered the reuse and refurbishment of existing buildings that could be functionally reused within the development and the required 25% public open space in accordance with the Z<sub>15</sub> zoning objective. It is considered that the reuse of Tabor House and The Chapel will provide a characterful setting within the development.

In addition, we note that a key priority throughout the design process was to provide appropriate transitions from the residential properties along Cherryfield Avenue Upper and Lower 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 with importantly no balconies proposed along the rear elevation. A high-level window is provided to the living/kitchen/dining room at first floor level of the duplexes with a pop-out bay window incorporating a solid back wall and glazing to the sides provided for the upper-level bedroom at the rear.

In addition, large setbacks of between c. 32.5 metres and c. 50 metres have been provided between the Norwood Park dwellings and Block C which comprises building heights of 2, 6 and 8 No. storeys. Furthermore, an 'inset' has been provided towards the centre of Block C along the northern boundary, which will provide a 4.5 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.

Please see Figures 4.13-4.15 below:



**Figure 4.13: Block Layout of the Proposed Development**

**(Source: OMP Architects)**



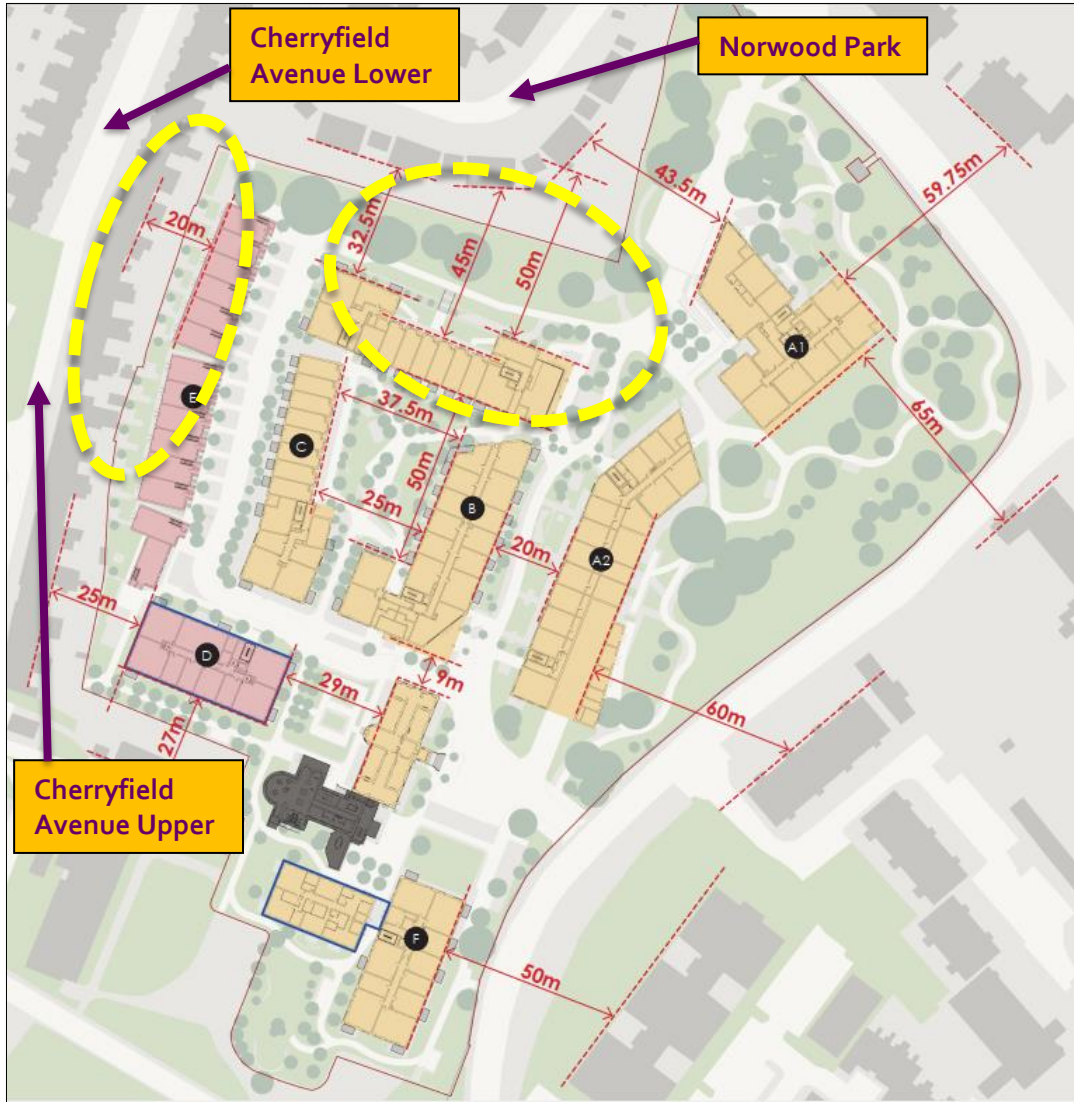


Figure 4.14: Separation Distances Proposed with Large Setbacks from Block C and 3 No. Storey Duplexes and Apartments in Block E Highlighted

(Source: OMP Architects, 2021)

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



Figure 4.15: 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 scheme at the prominent junction of Sandford Road and Milltown Road at a key arterial crossroads between Milltown, Clonskeagh, Donnybrook and Ranelagh. The Block A1 focal point will improve legibility and wayfinding for the wider area and internally within the site. The 10 No. storey element will improve legibility and wayfinding for the wider area and internally within the site.

The subject site has significant frontage onto a prominent junction which facilitates the unique opportunity to provide permeable connections through the site. These connections include through the public park and the pedestrian boulevard and in tandem with the provision of pedestrian gates and the opening up of portions of the boundary wall, this represents a significant planning gain for the area as the site is closed from the public (the lands have always been in private use by the Jesuit community). The provision of these connections will encourage permeability through the site benefiting the wider public, whilst also assisting with the integration of the proposed scheme into the surrounding area.

As noted above, it was determined that Tabor House and the Chapel were suitable to be functionally incorporated into the scheme design at Sandford Road. It is considered that the reuse and refurbishment of Tabor House and the Chapel presents the opportunity to showcase these buildings as 'object buildings' that can be functionally detached from the building grouping. The buildings will act as a focal point for the development especially entering the site from Milltown Road or walking through the pedestrian street from the northern end of the site with glimpses of Tabor House shown through the setbacks of Block B (see images in Figures 4.16 – 4.18 below).

Chapter 7 of the EIAR (Architectural Heritage) prepared by Molloy and Associates Conservation Architects states the following:

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





**Figure 4.16: CGI Towards Tabor House from the new Milltown Road Entrance**

(Source: 3D Design Bureau, 2021)



**Figure 4.17: CGI Towards Tabor House from the Pedestrian Boulevard**

(Source: 3D Design Bureau, 2021)

In conclusion, after assessing the building range on site and determining which could be viably adapted and used, it was considered that the reuse of Tabor House and the Chapel within the development would provide a new and characterful setting within the landscape with the remainder of the site utilised to incorporate new structures to provide a range of residential units and tenures as well as the extensive open spaces provided.

#### **4.3.2.2 Surface Water Design and Attenuation Strategy**

DBFL Consulting Engineers have provided the below details in relation to the surface water design and attenuation strategy for the subject development.

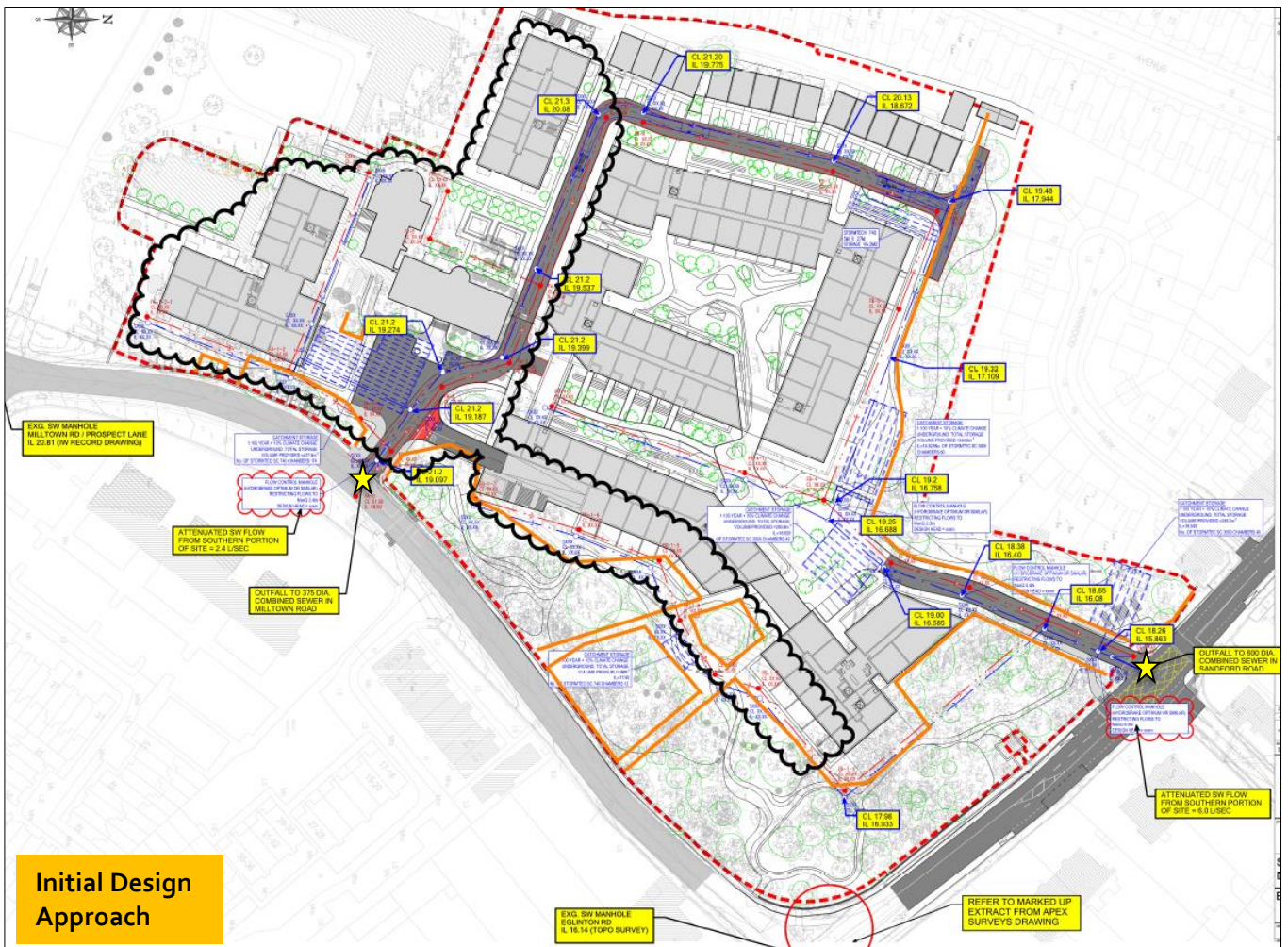


**Initial Design Approach**

Initially it was proposed to discharge surface water flow from the site at two locations (to the existing 600mm diameter combined sewer which is located adjacent to the site’s northern-eastern boundary on Sandford Road and to the existing 375mm diameter combined sewer located adjacent to the site’s south-eastern boundary on Milltown Road). The proposed outfall locations are identified in Figure 4.19 below.

Irish Water were unwilling to accept discharge of surface water flows to an existing combined sewer. Attenuation requirements for this solution also impacted on existing trees located adjacent to the Sandford Road entrance (i.e., removal of screening trees at the northern site boundary).

Given the issues outlined above an alternative surface water outfall and attenuation solution was developed.



**Figure 4.18: Original Surface Water Outfall Locations (Yellow Stars)**

(Source: DBFL Consulting Engineers)

### ***Commentary***

As noted above, the initial surface water drainage strategy was not acceptable to Irish Water (discharge of surface water drainage to an existing combined sewer) and impacted on existing trees along the site's northern boundary. As such, an alternative surface water outfall point was investigated and all attenuation structures were pulled closer to the proposed buildings to avoid / minimize impact on existing trees located along the site boundary.

### ***Final Option***

As advised by DBFL Consulting Engineers, it is proposed to discharge surface water flows from the proposed development to existing surface water drainage infrastructure on Eglinton Road. On this basis, Irish Water have advised that discharge of foul drainage flows to existing combined sewers adjacent to the site is feasible and thus this option has been chosen. With reference to Section 4.3 of the DBFL Infrastructure Report, Irish Water advised that *'if you were to connect to the storm sewer and divert any existing hardstanding to this storm sewer it would offset any impact from the foul connection'*.

An existing 225 mm diameter surface water drain is located approximately 80 metres from the eastern corner of the site on Eglinton Road.

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

In order to achieve the required drainage invert levels on site, approximately 160 metres of the existing drainage network along Eglinton Road will need to be replaced with a 300mm pipe running at a flatter gradient. The total length of the surface water outfall from the point it crosses the site boundary at Milltown Road to the discharge point on Eglinton Road is approximately 300 metres.

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.

Surface water discharge rates from the proposed surface water drainage network will be controlled by a vortex flow control device (Hydrobrake or equivalent) and associated underground attenuation tanks (Stormtech Chambers or equivalent).

This strategy satisfies the requirements of Irish Water (and Confirmation of Feasibility letter and Statement of Design Acceptance have been issued by Irish Water on this basis) and minimises impact on existing trees along the site boundary by relocating proposed attenuation areas (the location of same have been coordinated with the project arborists tree protection plan).





### 4.3.3 Alternative Processes

The proposed development includes the provision of 671 No. residential units (604 No. Build-to-Rent and 67 No. Build-to-Sell units), residential support facilities and amenities, a creche and associated development. Therefore, as the development proposes in excess of 100 No. residential units, it is mandatory that the planning application is lodged as a Strategic Housing Development Planning Application to An Bord Pleanála, under the *Planning and Development (Housing) and Residential Tenancies Act 2016*. Having regard to the nature of the proposed development, alternative processes were considered but ultimately deemed irrelevant given the nature of the project.

### 4.4 Alternative Mitigation Measures

The mitigation measures outlined throughout the various EIAR chapters are considered appropriate for the proposed development. Therefore, no alternative mitigation measures were considered in the preparation of this chapter.

### 4.5 Cumulative Impacts

Each design iteration comprehensively considered any potential impacts on neighbouring developments, modulating the edges of the scheme to provide an appropriate transition to its direct context. This ensures that an appropriate design response has been provided to minimise the cumulative impact of the development with neighbouring developments. We note that the Social Infrastructure Audit prepared by KPMG Future Analytics has also considered the capacity of surrounding infrastructure e.g. schools, health services, sports clubs etc. and concludes that sufficient capacity exists in the area to cater for the proposed development. Although it was concluded that a creche is not required, the Applicant has provided a creche in the scheme that can cater for the proposed development and the surrounding area.

A full list of proposed and pending applications was considered by the EIAR Team as set out in Chapter 3.0 (Section 3.5) and where relevant were included in the cumulative impacts assessment of the relevant chapter. In terms of this Examination of Alternatives Chapter, the surrounding developments are either at too great a distance or are too small to result in cumulative impacts with the subject proposed development. In addition, there are existing buildings located between the subject site and the list of developments outlined in Chapter 3.

In addition, Chapter 9 (Landscape and Visual Impact Assessment) prepared by Modelworks notes the following details in relation to cumulative impacts:

*'There are several recently permitted developments, and proposals currently in the planning process, for a range of development types, including residential schemes of higher density (than the prevailing density) in the vicinity of the site.*

*None of these permitted or proposed developments is (a) so close to the subject site, and/or (b) of such large scale that they could interact with the proposed development to result in townscape or visual impacts of greater significance than those predicted in Section 9.7 above. (There would be some cumulative townscape effect – see comment*



*on the Eglinton Road SHD scheme below - but this would not change the significance or quality classifications in 9.7.1.2.)*

*The Eglinton Road SHD scheme (PL29S.307267) is the largest of the permitted or proposed developments in the site vicinity. It is located at the opposite end of Eglinton Road from the site. That permission allows for the houses at nos. 1, 3, 5, 7, 9 and 11 Eglinton Road to be replaced by an apartment building of up to 13 storeys. This development and the subject proposal could not be seen in any one field of view (being separated by 500m and at opposite ends of a curved street). However, they would jointly contribute to a shift in townscape character experienced by the residents and users of Eglinton Road.*

*This is an example of how the proposed development would interact with other proposed developments, permitted developments and the already constructed higher density developments in the area (e.g. Cedar Hall, Grove House, etc.) to result in a general shift in townscape character - towards a more urban, mixed density condition. This change is the result of compact growth policy, and it is not a negative change. It should be recognised that while the introduction of higher density development will unavoidably cause a change in character and the composition of views, low density housing will remain the predominant development typology in the site vicinity.'*

Therefore, it is clear that the potential for any cumulative impacts to occur have been comprehensively considered.

#### **4.6 Conclusion**

As a result of a detailed design process, which included the 6 No. various design iterations outlined in this chapter and a significant number of design team meetings, it is considered that the proposed layout is the optimum arrangement in terms of appropriately densifying the subject lands while also protecting the residential amenity of the neighbouring residential properties.

As noted previously, the proposed layout locates 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.

The scheme also provides a substantial quantum of open space (c. 14,848 sq m) representing c. 34.9% of the site area which includes the provision of a large public park. As the site has been historically closed up to the public, the opening up of the site will welcome the public through the site for the first time and will become a gathering place for the community.

In addition to the public open space provision, the provision of permeable links (i.e. through the public park and through the pedestrian boulevard between Blocks A and B), new openings in the boundary wall (providing glimpses through the site) and the provision of new pedestrian gates will encourage permeability through the site which will benefit the wider community, whilst also assisting with the integration of the proposed scheme into the surrounding area. It is thus considered that the proposed development represents a significant planning gain for the area especially as the site has been historically closed up from the public.

The proposed development will also provide a high-quality living environment for residents in addition to the provision of creche, which will benefit the future residents and the surrounding area. In conclusion, the proposed layout is well considered and includes an appropriate mix of residential dwelling types, support facilities and amenities and a creche.

## 5.0 POPULATION AND HUMAN HEALTH

### 5.1 Introduction

The Chapter considers any likely impacts that the proposed development may have on population and human health. As fully detailed in Chapter 2.0 and 3.0 of this EIAR, the subject developable lands are located at the corner of Sandford Road and Milltown Road, Dublin 6. Any impacts on population and human health which may potentially arise as a result of a proposed development must be comprehensively addressed. The potential impacts can arise from many factors such as:

- Air Quality and Climate
- Noise and Vibration
- Water-Hydrology
- Transportation
- Waste Management
- Visual Impact
- Biodiversity
- Wind

These factors are dealt with in specific Chapters in this EIAR and have been prepared by the relevant specialist consultant. Therefore, this Chapter entitled 'Population and Human Health' will predominately cover any potential impacts not specifically covered in the other Chapters of this EIAR. We note that some potential impacts can be interrelated with impacts contained in the other Chapters and this will be set out where relevant. The specific potential impacts which are not specifically discussed elsewhere in this EIAR will relate to the following:

- Population Profile and Trends
- Housing
- Employment/Economy
- Local Services and Amenities
- Traffic
- Health and Safety

The 2014 EIA Directive updated the list of topics to be addressed in an EIAR and has replaced 'Human Beings' with 'Population and Human Health'. The term 'human health' is not defined in the 2014 EIA Directive; however, the European Commission (EC) *Guidance on the Preparation of the Environmental Impact Assessment Report (Directive 2011/92/EU as amended by 2014/52/EU)* (2017) states that:

*'Human health is a very broad factor that would be highly Project dependent. The notion of human health should be considered in the context of other factors in Article 3(1) of the EIA Directive and thus environmentally related health issues (such as health effects caused by the release of toxic substances to the environment, health risks arising from major hazards associated with the Project, effects caused by changes in disease vectors caused by the Project, changes in living conditions, effects on vulnerable groups, exposure to traffic noise or air pollutants) are obvious aspects to study. In addition, these would concern the commissioning, operation, and decommissioning of a Project in relation to workers on the Project and surrounding population' (p. 37).*

The EPA *Draft Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* (2017) state that:

*'In an EIAR, the assessment of impacts on population and human health should refer to the assessments of those factors under which human health effects might occur, as addressed elsewhere in this EIAR e.g. under the environmental factors of air, water, soil etc.'* (p.29)

This Chapter also meets the requirement for assessment of 'Human Beings' as per Schedule 6 of the *Planning and Development Regulations 2001 – 2021*.

#### 5.1.1 Qualifications and Experience

This Chapter of the EIAR was prepared by Patricia Thornton (BSc. Surv) (MRUP), Director of Thornton O'Connor Town Planning. Patricia is a Corporate member of the Irish Planning Institute and has 18 No. years post-qualification experience. Patricia has experience in preparing and coordinating EIARs for a variety of projects and has also been involved in the coordination of a wide range of developments including residential and commercial developments.

#### 5.1.2 Study Methodology

An initial site visit of the Sandford Road SHD site in Dublin 6 was undertaken on 4<sup>th</sup> November 2019 in order to ascertain an understanding of the subject site and its surrounding environs which has benefited the preparation of this Chapter. A further site visit was held on 18<sup>th</sup> February 2020 and was attended by Dublin City Council officials. At this site visit, the Dublin City Council officials were given an extensive tour of the interior of all the vacant former institutional buildings. Multiple further site visits took place in preparing the application.

A desk study has also been carried out to prepare this Chapter and has had regard to the following Guideline documents:

- *Guidelines on the Information to be Contained in Environmental Impact Statements (Environmental Protection Agency (EPA), draft August 2017);*
- *Advice Notes for Preparing Environmental Impact Statements (EPA, draft September 2015);*
- *Advice Notes on Current Practice in the Preparation of Environmental Impact Statements (EPA, 2003);*
- *Guidelines on the Information to be Contained in Environmental Impact Statements (EPA, 2002);*
- *IEMA's Health in Environmental Impact Assessment - <https://www.iema.net/assets/newbuild/documents/IEMA%20Primer%20on%20Health%20in%20UK%20EIA%20Doc%20V11.pdf>, and*



- *Environmental Impact Assessment of Projects – Guidance on the preparation of the Environmental Impact Assessment (Directive 2011/92/EU as amended by 2014/52/EU) (European Union, 2017).*

In addition to these Guideline documents, the policy documents and data sources consulted in the preparation of this EIAR Chapter included the following:

- *Dublin City Development Plan 2016 – 2022* ([www.dublincity.ie/dublin-city-development-plan-2016-2022](http://www.dublincity.ie/dublin-city-development-plan-2016-2022));
- Central Statistics Office (CSO) Census Data 2016 & 2011 ([www.cso.ie/en/](http://www.cso.ie/en/));
- CSO Live Register ([www.cso.ie/en/statistics/labourmarket/liveregister/](http://www.cso.ie/en/statistics/labourmarket/liveregister/));
- Dublin Housing Observatory (<https://airomaps.geohive.ie/dho/>);
- *Rebuilding Ireland - Action Plan for Housing and Homelessness, 2016* ([www.rebuildingireland.ie](http://www.rebuildingireland.ie));
- *Design Manual for Urban Roads and Streets* (<https://www.gov.ie/en/publication/3360b1-design-manual-for-urban-roads-and-streets/>);
- Met Eireann (<https://www.met.ie/climate/available-data/historical-data>);
- Dublin Bus ([www.dublinbus.ie](http://www.dublinbus.ie));
- Bus Connects ([www.busconnects.ie](http://www.busconnects.ie));
- Go Ahead Ireland ([www.goaheadireland.ie](http://www.goaheadireland.ie)); and
- Google Maps ([www.google.com/maps/](http://www.google.com/maps/)).

## 5.2 Description of the Proposed Development

Sandford Living Limited intend to apply to An Bord Pleanála for permission for a strategic housing development at this c. 4.26 hectare site at Milltown Park, Sandford Road, Dublin 6, Do6 V9K7. Works are also proposed on Milltown Road and Sandford Road to facilitate access to the development including improvements to pedestrian facilities on an area of c. 0.16 hectares. The development's surface water drainage network shall discharge from the site via a proposed 300mm diameter pipe along Milltown Road through the junction of Milltown Road / Sandford Road prior to outfalling to the existing drainage network on Eglinton Road (approximately 200 metres from the Sandford Road / Eglinton Road junction), with these works incorporating an area of c. 0.32 hectares. The development site area, road works and drainage works areas will provide a total application site area of c. 4.74 hectares.

The development will principally consist of: the demolition of c. 4,883.9 sq m of existing structures on site including Milltown Park House (880 sq m); Milltown Park House Rear Extension (2,031 sq m); the Finlay Wing (622 sq m); the Archive (1,240 sq m); the link building between Tabor House and Milltown Park House rear extension to the front of the Chapel

(74.5 sq m); and 36.4 sq m of the 'red brick link building' (single storey over basement) towards the south-western boundary; the refurbishment and reuse of Tabor House (1,575 sq m) and the Chapel (768 sq m), and the provision of a single storey glass entrance lobby to the front and side of the Chapel; and the provision of a 671 No. unit residential development comprising 604 No. Build-to-Rent apartment and duplex units (88 No. studios, 262 No. one bed units, 242 No. two bed units and 12 No. three bed units) and 67 No. Build-to-Sell apartment and duplex units (11 No. studios, 9 No. one bed units, 32 No. two bed units and 15 No. three bed units).

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

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

The proposed works also include a new 2.4 metre high boundary wall across the site from east to west (towards the southern boundary) requiring the demolition of a portion of the red brick link building that lies within the subject site towards the south-western boundary (36.4 sq m) and the making good of the façade at the boundary. The existing Link Building is the subject of a separate application for permission (DCC Reg. Ref. No. 3866/20) that includes a request for permission to demolish that Link Building, including the part of the building on the lands the subject of this application for SHD permission. If that application is granted and first implemented, no demolition works to the Link Building will be required under this application for SHD permission. If that application is refused permission or not first implemented, permission is here sought to demolish only that part of the Link Building now existing on the lands the subject of this application for permission and to make good the balance at the red line with a blank wall.

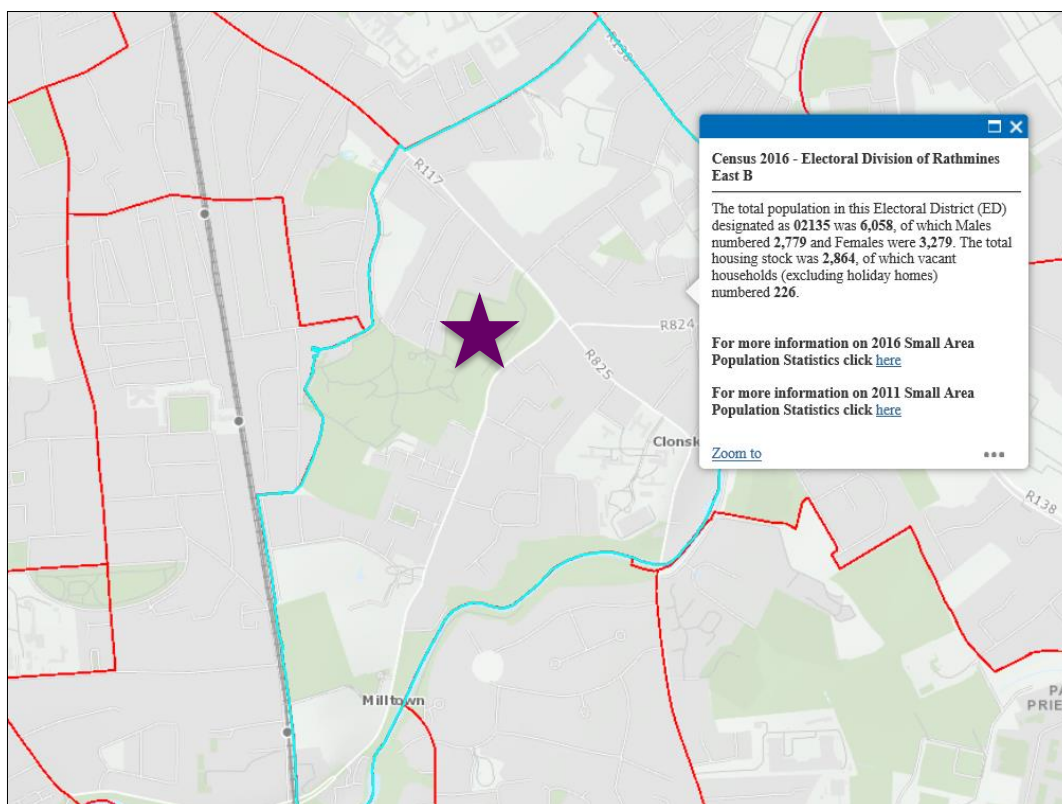
The development also provides a new access from Milltown Road (which will be the principal vehicular entrance to the site) in addition to utilising and upgrading the existing access from Sandford Road as a secondary access principally for deliveries, emergencies and taxis; new pedestrian access points; pedestrian/bicycle connections through the site; 344 No. car parking spaces (295 No. at basement level and 49 No. at surface level) which includes 18 No. mobility impaired spaces, 10 No. car share spaces, 4 No. collection/drop-off spaces and 2 No. taxi spaces; bicycle parking; 14 No. motorcycle spaces; bin storage; boundary treatments; private balconies and terraces facing all directions; external gantry access in sections of Blocks A1, A2 and C; hard and soft landscaping including public open space and

communal open space (including upper level communal terraces in Block A1, Block B and Block C which will face all directions); sedum roofs; PV panels; substations; lighting; plant; lift cores; and all other associated site works above and below ground. The proposed development has a gross floor space of c. 54,871 sq m above ground level over a partial basement (under part of Block A1 and under Blocks A2, B and C) measuring c. 10,607 sq m, which includes parking spaces, bin storage, bike storage and plant.

### 5.3 Baseline Scenario: Population Profile and Trends

#### 5.3.1 Rathmines East B Electoral Division

The subject site is located within the Electoral Division of Rathmines East B (ED02135) according to the Census 2016 information. The extent of this Electoral Division and the location of the subject site is illustrated at Figure 5.1 below.



**Figure 5.1: Map Demonstrating the Electoral Division of Rathmines East B with the Subject Site Annotated Indicatively by the Purple Star**

(Source: Census 2016, annotated by Thornton O'Connor Town Planning, 2021)

According to the Census 2016, the Rathmines East B Electoral Division had a population of 6,058 No. persons. However, we note that the number of persons accommodated in the 2,410 No. households was 5,605 No. persons (i.e. 453 No. additional persons were present in this Electoral Division on the night of the census who are not normally present in the area).

The 2011 Census recorded a population of 5,533 No. persons within this ED on the night of the Census and the number of persons accommodated in the 2,309 No. households was

5,142 No. persons. Therefore, there has been an increase in the population recorded on the night of the Census of 525 No. persons (9.5% increase) and an increase in the number of persons accommodated in the households in this ED of 463 No. persons (9% increase). This will be discussed further in Section 5.4 below.

The Census data demonstrates that Dublin City experienced an increase in population from 527,612 No. persons in 2011 to 554,554 No. persons in 2016 (5.1% increase-26,942 No. persons), and the population of Ireland also experienced an increase in population from 4,588,252 No. persons in 2011 to 4,761,865 No. persons in 2016 (3.8% increase).

Please see a summary of the breakdown of population trends in the Rathmines East B ED in 2011 and 2016:

Population Profile and Trends <sup>1</sup>			
	Census 2011	Census 2016	Increase
Population	5,533	6,058	+525 (9.5 %)
Person Accommodated in Households	5,142	5,605	+463 (9%)
No. of Households	2,309	2,410	+101 (4%)

Table 5.1: Population Profile and Trends in the Rathmines East B ED

(Source: Census 2016/CSO)

### 5.3.2 Description of the Existing Population

There are a range of age groups living in the Rathmines East B ED according to the 2016 Census. As demonstrated in Table 5.2 below, a large concentration of persons are of working age between 19 and 64 No. years old (4,226 No. persons or 70% of the ED population), which is higher than the figures for the State (2,872,502 No. persons representing 60.3% of the population) and for Dublin City (377,029 No. persons or 68% of the population).

Due to the high number of persons living in the area who are aged between 19 and 64 No. years old, the Dependency Ratio for the Rathmines East B ED is ultimately lower than recorded for the County and the State (Dependency Ratio relates to those not of working age i.e. 0 – 18 years old and 65+).

Population by Age <sup>2</sup>						
Age Group (years)	Ireland 4,761,865 No. persons		Dublin City 554,554 No. persons		Rathmines East B ED 6,058 No. persons	
0-4	331,515	7%	30,683	5.53%	328	5.4%
5-12	548,693	11.52%	42,603	7.68%	416	6.9%
13-18	371,588	7.8%	31,884	5.75%	288	4.8%
19-24	331,208	7%	51,308	9.25%	543	9%

<sup>1</sup>[http://census.cso.ie/sapmap2016/Results.aspx?Geog\\_Type=ED3409&Geog\\_Code=2AE196291DD413A3E05500000000001#SAPMAP\\_T1\\_100](http://census.cso.ie/sapmap2016/Results.aspx?Geog_Type=ED3409&Geog_Code=2AE196291DD413A3E05500000000001#SAPMAP_T1_100)

[http://census.cso.ie/sapmap2016/Results.aspx?Geog\\_Type=ED3409&Geog\\_Code=2AE196291DD413A3E05500000000001#SAPMAP\\_T5\\_500](http://census.cso.ie/sapmap2016/Results.aspx?Geog_Type=ED3409&Geog_Code=2AE196291DD413A3E05500000000001#SAPMAP_T5_500)

<sup>2</sup>[http://census.cso.ie/sapmap2016/Results.aspx?Geog\\_Type=ED3409&Geog\\_Code=2AE196291DD413A3E05500000000001#SAPMAP\\_T1\\_100](http://census.cso.ie/sapmap2016/Results.aspx?Geog_Type=ED3409&Geog_Code=2AE196291DD413A3E05500000000001#SAPMAP_T1_100)



25-39	1,048,831	21.89%	169,317	30.53%	2,215	36.6%
40-54	983,505	20.65%	103,857	18.73%	1,024	17%
55-64	508,958	10.69%	52,547	9.48%	444	7.3%
65+	637,567	13.39%	72,355	13.05%	800	13%
Total	4,761,865		554,554		6,058	
Dependency Ratio		39.7%		32%		30%

**Table 5.2: Population Profile of the Rathmines East B Electoral Division, Dublin City and the State**

**(Source: Census 2016/CSO)**

As the highest concentration of the Rathmines East B ED population are of working age, the proposed scheme will provide an enhanced choice of tenure in the area, affording greater flexibility to those who may be seeking to rent an apartment in the area or looking to purchase a dwelling.

We note that the scheme will also significantly benefit the existing population who are not in the workforce e.g. retirement age and cohort. There are a high number of persons aged 65+ (13%) in the Rathmines East B ED who may welcome the opportunity to downsize to a smaller duplex or apartment in their local area (Build-to-Sell units). This would relieve pressure on that market sector by opening up larger family dwellings for sale in the surrounding areas.

We also note that 5.4% of the ED population were aged 0 – 5 years old at the time of the 2016 Census. The proposed development includes the provision of a crèche which in addition to catering for the younger cohort of persons that will be accommodated in the proposed development, will also cater for the younger cohort in the wider ED area.

The scheme provides 67 No. Part V units which will cater for persons in need of a dwelling as per the social housing list.

Therefore, it is clear that the proposed development caters to the housing needs of a wide range of persons as the development will provide a mix of Build-to-Sell and Build-to-Rent unit types comprising 1, 2 and 3 No. bedrooms units. To summarise the following age groups will be principally catered for:

- Persons within the working age group looking to rent or purchase a home;
- Persons older than the working age group seeking to trade down;
- Families who may wish to rent or purchase a home and which contains a crèche within the development; and
- Persons in need of a dwelling as per the social housing list.

## 5.4 Baseline Scenario: Housing

### 5.4.1 Average Household Size

As noted previously, the Rathmines East B ED recorded a population of 6,058 No. persons in the 2016 Census with 5,603 No. persons accommodated in the 2,410 No. households. The ED recorded an average of 2.3 No. persons per private household in 2016 which is lower than the national state average of 2.7 No. persons and the Dublin average of 2.5 No. persons (see Table 5.3 below).

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

Table 5.3: Average Household Size of the Rathmines East B ED, Dublin City and the State

(Source: Census 2016/CSO)

Therefore, the ED is predominated by smaller households and it is important to provide tenure choice for such household formations.

### 5.4.2 Households by Number of Rooms

As shown below in Table 5.4, there are a large number of permanent private households which comprise 4 rooms or more within the Rathmines East B ED (1,441 No.). The Census 2016 provided the following definition when stating the number of rooms as follows:

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

Permanent Private Households by Number of Rooms <sup>3</sup>		
No. of Rooms	No. of Households	No. of Persons Accommodated
1 room	93	144
2 rooms	313	548
3 rooms	412	839
4 rooms	408	820
5 rooms	308	758
6 rooms	250	651
7 rooms	190	564

<sup>3</sup>[http://census.cso.ie/sapmap2016/Results.aspx?Geog\\_Type=ED3409&Geog\\_Code=2AE196291DD413A3E055000000000001#SAPMAP\\_T6\\_650](http://census.cso.ie/sapmap2016/Results.aspx?Geog_Type=ED3409&Geog_Code=2AE196291DD413A3E05500000000001#SAPMAP_T6_650)

8 or more rooms	285	955
Not stated	151	326
Total	2,410	5,605

**Table 5.4: Permanent Private Households by Number of Rooms for the Rathmines East B Electoral Division**

(Source: Census 2016/CSO)

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

It is our opinion that there is a significant opportunity to densify this area of Dublin with a mix of studio, 1, 2 and 3 No. bedroom units to achieve a balance between household sizes and dwelling sizes. The Build-to-Rent element of the scheme will address the lack of rental accommodation in the area and as such the scheme will cater for a wider cohort of persons.

#### 5.4.3 Housing Completions

Due to the undersupply of housing completions during the recession, recent planning policy has emphasised the need to provide more homes annually to meet the housing needs of the State.

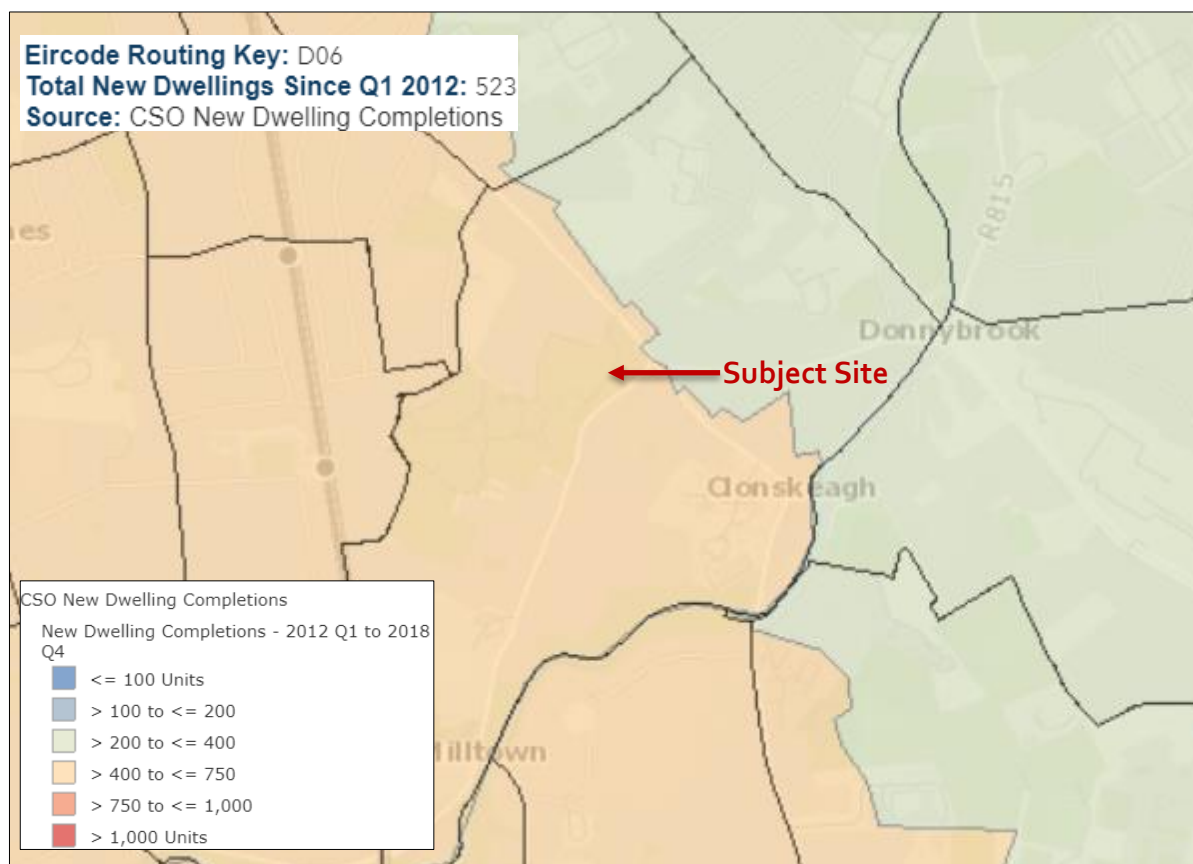
For example, Section 1.6 of the *Sustainable Urban Housing: Design Standards for New Apartments, 2018* sets out the following:

*'In the longer term to 2040, the National Planning Framework (NPF) projects a need for a minimum of 550,000 new homes, at least half of which are targeted for provision in Ireland's five cities...In broad terms, this means a need for an absolute minimum of 275,000 new homes in Ireland's cities to 2040, with half of these located in already built-up areas.'*

An overarching aim of the *Rebuilding Ireland An Action Plan for Housing and Homelessness* is:

*'to ramp up delivery of housing from its current under-supply across all tenures to help individuals and families meet their housing needs, and to help those who are currently housed to remain in their homes or be provided with appropriate options of alternative accommodation, especially those families in emergency accommodation.'*

As demonstrated below in Figure 5.2, the number of households completed in the Dublin 6 area from 2012 to 2018 was 523 No. which is lower than some other areas in the Dublin area e.g. Dublin 14 – 740 No. completions, Dublin 16 – 648 No. completions and Dublin 18 – 1,520 No. completions. We consider that the subject site has significant potential to provide a large number of dwelling units on scarce underutilised land in a core urban location.



**Figure 5.2: Map Demonstrating Housing Completions in the Dublin 6 Area Between 2012 to 2018 (Subject Site Indicatively Outlined in Red)**

(Source: Dublin Housing Observatory<sup>4</sup>, annotated by Thornton O'Connor Town Planning, 2021)

## 5.5 Baseline Scenario: Employment and Commuter Patterns

### 5.5.1 Employment in the Local Area

The subject site is well located given the range of employment locations that can be easily accessed by walking, cycling and public transport from the site such as Belfield Office Park, Ballsbridge, Ranelagh, Donnybrook, Rathmines, Clonskeagh Hospital, The Royal Hospital Donnybrook, St Vincent's Hospital, St Luke's Hospital, University College Dublin, The Canal, The Docklands, Harcourt Street and Sandyford Business District for example. The site is also within 1 km/c. 13 minutes walking distance of the Beechwood Green Line Luas stop which provides excellent access to a significant quantum of employment locations.

There are 3,374 No. employed persons in the Rathmines East B ED which represents 65% of the population aged 15 years and over in the ED. This percentage is higher than the number of persons employed in Dublin City which represents 56% of the population aged 15 years and over. The sustainable location of the subject site within the Rathmines East B ED is emphasised through the examination of commuting patterns below in Section 5.5.2.

<sup>4</sup> <https://airomaps.geohive.ie/dho/>

### 5.5.2 Commuter Patterns

The data relating to the commuter patterns in the Rathmines East B Electoral Division have been extracted from the Census 2016 results, in addition to the data relating to Dublin City and the State. Please see Table 5.5 below for full details:



Population aged 5 years and over by means of travel to work, school or college <sup>5</sup>												
Means of Travel	Rathmines East B ED				Dublin City				State			
	Work	School or College	Total	%	Work	School or College	Total	%	Work	School or College	Total	%
On foot	758	453	1,211	27.9	50,904	40,212	91,116	25.5	175,080	251,141	426,221	13.94
Bicycle	289	137	526	12.09	26,116	8,385	34,501	9.65	56,837	25,286	82,123	2.68
Bus, minibus or coach	245	109	354	8.14	39,587	18,820	58,407	16.33	111,436	201,661	313,097	10.24
Train, DART or Luas	367	59	426	9.8	17,160	3,527	20,687	5.78	63,133	19,494	82,627	2.7
Motorcycle or Scooter	23	0	23	0.53	1,642	67	1,709	0.48	7,990	575	8,565	0.28
Car Driver	1,173	43	1,216	27.97	82,585	2,630	85,215	23.8	1,152,631	49,810	1,202,441	39.31
Car Passenger	55	213	268	6.16	5,683	22,052	27,735	7.75	77,335	492,919	570,254	18.64
Van	20	0	20	0.46	5,533	80	5,613	1.57	126,029	2,281	128,310	4.2
Other (incl. lorry)	3	1	4	0.09	349	34	383	0.1	11,593	324	11,917	0.39
Work mainly at home or from home	106	0	106	2.4	5,060	113	5,173	1.45	94,955	1,102	96,057	3.14
Not stated	156	38	194	4.46	21,094	6,073	27,167	7.59	93,709	43,286	136,995	4.48
<b>Total</b>	<b>3,295</b>	<b>1,053</b>	<b>4,348</b>		<b>255,713</b>	<b>101,993</b>	<b>357,706</b>		<b>1,970,728</b>	<b>1,087,879</b>	<b>3,058,607</b>	

Table 5.5: Population aged 5 years and over by means of travel to work, school or college in the Rathmines B East Electoral Division [% in purple denotes those who travel on foot, bicycle or public transport]

(Source: Census 2016/CSO)

<sup>5</sup> [http://census.cso.ie/sapmap2016/Results.aspx?Geog\\_Type=ED3409&Geog\\_Code=2AE196291DD413A3E05500000000001#SAPMAP\\_T11\\_1101](http://census.cso.ie/sapmap2016/Results.aspx?Geog_Type=ED3409&Geog_Code=2AE196291DD413A3E05500000000001#SAPMAP_T11_1101)

We note that of the 4,438 No. persons travelling to either work, school or college in the ED, some 2,517 No. (or 58%) utilise the bus, train, DART, Luas or either walk or cycle. In comparison we note that 57% of persons in Dublin City and 29.56% of persons in the State travel to work, school or college utilising the bus, train, DART, Luas or either walk or cycle. Therefore, the sustainable location of the subject site is reflected in the statistics for commuter patterns in the ED when compared to Dublin City and the State.

Some 106 No. persons (2.4%) mainly work from home and 194 No. persons (4.46%) did not state how they travel to work. Of the remaining working persons, some 23 No. persons (0.53%) use a motorbike or scooter, 20 No. persons (0.46%) travel by van, 1,216 (27.97%) travel by car and an additional 268 No. persons (6.16%) travel to work as a car passenger. The number of persons that drive a car to work (27.97%) is significantly lower than the national average of 39.31% which demonstrates the sustainable location of the subject lands.

The journey times of commuters travelling to work, school or college are set out in the table below:

Population aged 5 years and over by journey time to work, school or college <sup>6</sup>	
Journey time	No. of Persons
Under 15 mins	717
¼ hour – under ½ hour	1,611
½ hour – under ¾ hour	1,218
¾ hour – under 1 hour	284
1 hour – 1 ½ hours	132
1 ½ hours and over	29
Not stated	251
<b>Total</b>	<b>4,242</b>

**Table 5.6: Population aged 5 years and over by journey time to work, school or college**

(Source: Census 2016/CSO)

As demonstrated in Table 5.6 above, 54.9% of persons (2,328 No. persons) travelling to work, school or college commute for less than 30 No. minutes which demonstrates the sustainable and core urban location of the Rathmines East B ED. Although many people will now be working from home, it is clear that the provision of the proposed 671 No. new homes for the area will allow residents to have a choice to work at home or to travel a sustainable distance via sustainable modes of transport to work.

### 5.5.3 Unemployment Figures

As demonstrated in Section 5.5.1 and Section 5.5.2, the subject site located within the Rathmines East B ED is clearly a highly sustainable core urban location. This is clear when the Census 2016 results are analysed in terms of unemployment rates. We note that Covid-19 may have affected the area in terms of unemployment.

<sup>6</sup> [http://census.cso.ie/sapmap2016/Results.aspx?Geog\\_Type=ED3409&Geog\\_Code=2AE196291DD413A3E05500000000001#SAPMAP\\_T11\\_1103](http://census.cso.ie/sapmap2016/Results.aspx?Geog_Type=ED3409&Geog_Code=2AE196291DD413A3E05500000000001#SAPMAP_T11_1103)

Population aged 15 years and over by principal economic status <sup>7</sup>	
Principal Economic Status	No. of Persons
At work	3,374
Looking for first regular job	19
Unemployed having lost or given up previous job	135
<b>Total Available Labour Force</b>	<b>3,528</b>

**Table 5.7: Population aged 15 years and over by principal economic status**

**(Source: Census 2016/CSO)**

As shown in Table 5.7 above, the total number of persons 'at work', 'unemployed' or 'looking for their first regular job' was 3,528 No. persons.

At the time of the Census 2016, 135 No. persons stated that they were 'unemployed having lost or given up a previous job' and 19 No. persons were 'looking for their first regular job' (total of 154 No. persons were not working). Therefore, the unemployment rate of the Rathmines East B ED is 4.37% at the time of the 2016 Census, which is significantly lower than the national unemployment figure of 12.9%. This is a very favourable comparison to the national unemployment rate and is a direct reflection of the sustainable location of the site within this ED which has easy access to a wide range of employers.

We note that the definition of unemployment differs in the Census 2016 to the Quarterly National Household Survey as set out in the document 'Census 2016 Summary Results – Part 2' as follows:

*'Users should be aware that information derived from identical questions in the census and Quarterly National Household Survey for the same year may show appreciable differences. The main categories affected are the constituents of the question on principal economic status and the employment estimates classified by industry and occupation.'*

*The chief difference resulting from this is that the Census records an unemployment rate (based on Principal Economic Status) of 12.9%, compared with the official rate (based on International Labour Organisation criteria) of 8.6%. Notwithstanding these differences, the main strength of the census-based data on employment and unemployment is the provision of data for small geographic areas [etc..]'*

Therefore, the unemployment figures for 2016 for the Rathmines East B ED are considered very low when compared to the national figure of 12.9% as derived from the Census 2016, reflecting the multitude of employment nodes that are easily accessible to the area.

The most recent Economic and Social Research Institute (ESRI) *Quarterly Economic Commentary Summer*<sup>8</sup> notes the following in relation to the labour market:

<sup>7</sup>[http://census.cso.ie/sapmap2016/Results.aspx?Geog\\_Type=ED3409&Geog\\_Code=2AE196291DD413A3E0550000000000001#SAPMAP\\_T8\\_801](http://census.cso.ie/sapmap2016/Results.aspx?Geog_Type=ED3409&Geog_Code=2AE196291DD413A3E055000000000001#SAPMAP_T8_801)

<sup>8</sup> [Quarterly Economic Commentary, Summer 2021 | ESRI](#)

*'The COVID-19 pandemic has had a significant and lasting impact on the Irish labour market. Substantial fluctuations in the unemployment rate since early 2020 reflect the impact of the tightening and loosening of public health restrictions on businesses. The unemployment rate in February 2020 was 5 per cent while the COVID-adjusted unemployment rate<sup>9</sup> peaked at 30.5 per cent only two months later in April 2020. When restrictions were eased during the summer of 2020, the unemployment rate experienced a significant decline between May and September 2020.*

*In line with the re-introduction of more stringent public health restrictions, the unemployment rate increased from 15.7 per cent in September 2020 to 25.3 per cent in January 2021. Since January 2021 the unemployment rate has declined, to stand at 22.4 per cent in April 2021. The average monthly unemployment rate for 2020 was approximately 18.9 per cent while the average for Q1 2021 was 24.7 per cent'.*

#### 5.5.4 Labour Force Survey

The Labour Force Survey (LFS) for Quarter 4 2019<sup>10</sup> indicated that:

*'There was an annual increase in employment of 3.5% or 79,900 in the year to the fourth quarter of 2019, bringing total employment to 2,361,200. This compares with an annual increase of 2.4% or 53,700 in employment in the previous quarter and an increase of 2.3% or 50,500 in the year to Q4 2018.'*

Furthermore, the Quarter 2 2019 Labour Force Survey stipulates that:

*'Unemployment decreased by 18,300 (-14.2%) in the year to Q4 2019 bringing the total number of persons unemployed to 110,600. This is the thirtieth quarter in succession where unemployment has declined on an annual basis.'*

We note that the economy has clearly taken a turn due to Covid-19 pandemic however we consider it important to assess the positive trends that were emerging before the pandemic impacted the country.

#### 5.5.5 Economic Environment

The Economic and Social Research Institute (ESRI) *Quarterly Economic Commentary Winter 2019*<sup>11</sup> provided a forecast overview of the Irish economy. As noted above, the economy has been impacted by Covid-19, but we consider it important to consider the economic environment prior to the pandemic. This ESRI publication anticipated that:

*'2019 is likely to witness another year of substantial growth for the Irish economy. This comes in the face of significant uncertainty with the prospect of a No-Deal Brexit hovering over the domestic economy for most of 2019. We believe the economy will grow by 5.8 per cent in 2019 before slowing somewhat in 2020 to a growth rate of 3.3 per cent. The latter forecast assumes that Brexit does not occur next year and is*

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<sup>9</sup> The COVID-adjusted unemployment rate classifies those on the PUP as unemployed. Where the text refers to an unemployment rate for a period after February 2020 the authors are referring to the COVID-adjusted unemployment rate (ESRI, 2021)

<sup>10</sup> <https://www.cso.ie/en/releasesandpublications/er/lfs/labourforcesurvey/lfsquarter42019/>

<sup>11</sup> <https://www.esri.ie/publications/quarterly-economic-commentary-winter-2019>

*influenced by the slowdown observed in the performance of many of the main trading partners of the Irish economy.'*

The ESRI notes the increase in housing completions for Q3 2019 and for the entire year:

*'The latest figure for Q3 2019 indicates that nearly 5,700 units were completed for the quarter, with circa 14,700 units being built for the year to date. This represents an acceleration of 20 per cent on an annualised basis.'*

The aforementioned data analysis is not available at the scale of the Electoral Division. The Build-to-Rent element will provide suitable accommodation for those who do not have the financial means and/or desire to purchase a dwelling unit or wish to remain mobile.

The publication also sets out that in Q3 2019:

- *'Unemployment rate falls below 5 per cent for the first time since 2007;*
- *Employment rises by 2.4 per cent in the year to Q3 2019 with 2,326,900 people at work; and*
- *Average weekly earnings increased by 4 per cent annually in Q3 2019.'*

In addition, we have also reviewed the most recent Economic and Social Research Institute (ESRI) *Quarterly Economic Commentary Summer 2021*<sup>12</sup> which notes:

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

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

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

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<sup>12</sup> [Quarterly Economic Commentary, Summer 2021 | ESRI](#)



### 5.5.6 Live Register

The CSO describes the Live Register as follows:

*'The Live Register is used to provide a monthly series of the numbers of people (with some exceptions) registering for Jobseekers Benefit (JB) or Jobseekers Allowance (JA) or for various other statutory entitlements at local offices of the Department of Social Protection. Information is published in the form of a monthly release titled the Live Register. Data is also held on the CSO StatBank and also published in the CSO's Statistical Yearbook.*

*The Live Register is not designed to measure unemployment. It includes part-time workers (those who work up to three days per week), seasonal and casual workers entitled to Jobseekers Benefit and Jobseekers Allowance.'*

Therefore, while not giving specific unemployment figures, the Live Register figures can give a good indication of economic and employment activity in the area.

The most recent figures for County Dublin (pre Covid-19 pandemic) in February 2020<sup>13</sup> indicate that there were 44,218 No. persons on the Live Register compared to 47,926 No. persons in March 2019. This represents a decrease of 3,708 No. persons (-7.74%) from March 2019 to March 2020 in the wider County Dublin further demonstrating that the unemployment rate experienced a similar ratio of reduction recorded at State level between February 2019 – February 2020. As noted above, Covid-19 has had an impact on unemployment however it is beneficial to review the trends for the area prior to the pandemic.

Live Register February 2019-February 2020			
Live Register Figures	February 2019	February 2020	% Decrease February 2019-2020
County Dublin	47,926	44,210	-7.74%
State	196,934	182,616	-7.27%

Table 5.8: Live Register Figures February 2019-February 2020

(Source: Central Statistics Office)

## 5.6 Baseline Scenario: Local Services and Amenities

There are a wide range of services and facilities available in close proximity to the subject site as the site is positioned at the prominent interchange of Sandford Road and Milltown Road which is a key arterial crossroads between Milltown, Clonskeagh, Donnybrook, Ballsbridge and Ranelagh. Therefore, there are a number of neighbourhood centres in proximity to the site within easy cycling and/or walking distance of the subject site. Please see Figure 5.3 below and the corresponding table which provides an example of the wide range of services and facilities in these neighbourhood centres which will serve the subject site.

<sup>13</sup> <https://statbank.cso.ie/px/pxeirestat/Statire/SelectVarVal/saveselections.asp>

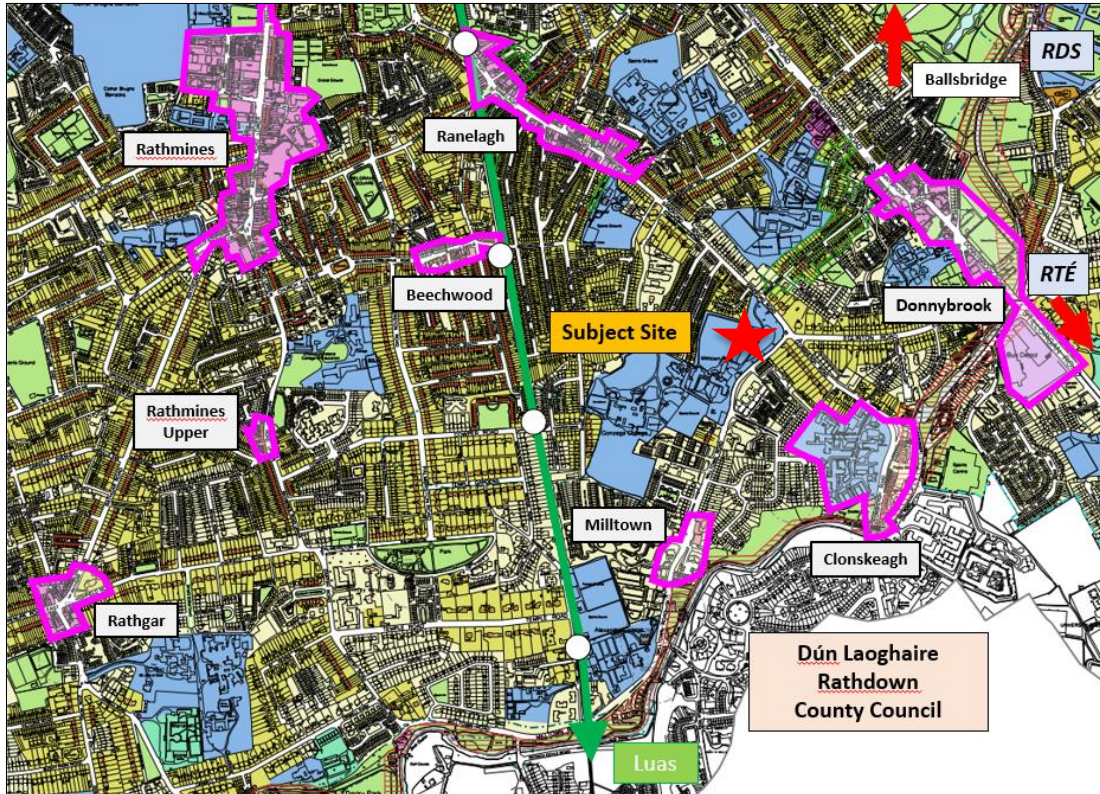


Figure 5.3: Neighbourhood and District Centres in the Surrounding Area

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

Services and Facilities in Close Proximity to the Subject Site			
<b>Milltown- c.450 metres/c.6 minutes walking distance/c.1 minute cycling distance</b>			
Eurospar	Wilde and Green Café	New Element Fitness Gym	Poise Hair Salon
Daisy Montessori Childcare	Chain and Milltown Dental Clinic	Milltown Dry-Cleaning and Laundry Service	Milltown Total Health Pharmacy
Phelans Pharmacy	Parish of Columbanus, Saint Gall and Assumption of the Blessed Virgin Mary Church		
<b>Donnybrook-c.500 metres-c.900 metres/c.6-10 minutes walking distance/c.2-3 minutes cycling distance</b>			
Donnybrook Fair	Donnybrook Lawn Tennis Club	Tesco Express	Lloyds Pharmacy
Boots Pharmacy	Spar Donnybrook	Energia (Donnybrook Stadium) Park	Beactive Rangers Football Club
Be Active Lawn Tennis Club	Lyk Nu Cleaners	AIB Bank	115 Medical (Doctor)
D4 Medical Centre	The Grafton Barber	Donnybrook Dental Practice	93 Hairdressing

Mary Moore Podiatry/Chiropody	Brens Barber Shop	Donnybrook Foot Mechanics	Skin by Olga
Di Milo Hair Design	Mink Hand & Foot Spa	Donnybrook Bikes	O'Brien's Off Licence
Insomnia Café	Fast Fit (Car Repair and Maintenance)	First Stop Garage	McCloskey's Bar
Café Java	Marco Pierre White Courtyard Bar and Grill	Nourish Donnybrook Health Food Store	Green Beards Café
The Donnybrook Gastropub	Mulberry Garden Restaurant	Romayo's Donnybrook Fish and Chips	Abrakebabra
Eddie Rockets	Arthur Mayne's Bar	Black Pepper Indian Restaurant	Café Nero
Mao at Home Restaurant	Le Comptoir	Café Diem	Donnybrook Parish-Church of the Sacred Heart
<b>Clonskeagh- c.450 metres – 1.3 km /c.6-16 minutes walking distance/c.1-6 minutes cycling distance</b>			
The 105 Café	Ashtons Gastro Pub	Sims Clinic	Applegreen
David Lloyd Gym	Harrys Bikes	Platinum Pilates and Physiotherapy	Farmer Browns Pub
Bombay Pantry Restaurant	Clonskeagh Hospital		
<b>Ranelagh- c.500 m-1.4 km/c.6-18 minutes walking distance/c.1-5 minutes cycling distance</b>			
Ranelagh Physiotherapy-The Physio Company	Meagher's Pharmacy Sandford Road	Meagher's Pharmacy Ranelagh Village	Scoop Ranelagh Ice Cream Shop
The Red Lotus Hand and Foot Spa	Lidl	The Stella Cinema Ranelagh	The Devlin Hotel
Tesco Express	SuperValu	Joys Flowers Florist	Anastasia Boutique
Ranelagh Launderette	Expert Hardware	Bank of Ireland	Ranelagh Thai Centre Massage Therapist
i-Service Mobile Repairs	Boylesports Bookmakers	Gmale Barbers	The Company of Books
Headcases Hair Studio	Yogabase Ranelagh	The Zip Yard Sewing Shop	Ranelagh Village Dental
Seagreen Boutique	Leech Pharmacy	Origin Hair Salon	Brown Sugar Hairdresser
Advanced Electrolysis Clinic	Rouge Beauty Salon	The Village Butcher Shop	Ranelagh and District Credit Union
Ranelagh Post Office	Spar	AIB Bank	Burke's Pharmacy
Flyefit Ranelagh	Oslo Beauty Ranelagh	Wildflower Hair Salon	Ranelagh Park Playground
Ranelagh Seventh-day Adventist Church	Archview Physiotherapy	White Crane Kung Fu and Tai Chi	Mountpleasant Square Park

Mountpleasant Lawn Tennis Club			
<b>A large number of café/restaurants/bars are also located in Ranelagh including:</b>	Pizza Yard Restaurant	R McSorleys Bar	The Wild Goose Grill
Birchalls Bar	Americana Bar	Layla's Rooftop Restaurant	New Bamboo Chinese Takeaway
Nightmarket Thai Restaurant	Bunsen Restaurant	Four Star Pizza	La Bodega Restaurant
Cinnamon Restaurant	Humphrey's Pub	Smyths of Ranelagh Bar	Er Buchetto Café
Butcher Grill Steak House	Antica Venezia Restaurant	CoCo Fresh Tea and Juice	Tribeca Restaurant
Butlers Chocolate Café	Scoff Café	Gigi Restaurant	Tonys Café
Dillinger's Restaurant	Mario's Italian	Zaytoon Restaurant	Milano Restaurant
The Taphouse Bar	Wowburger Restaurant	DIEP Thai Takeaway	Kinara Kitchen Restaurant
The Exchequer Wine Bar	Rita's Restaurant	Emerald Court Chinese Restaurant	Nick's Coffee
Pinocchio Restaurant			
<b>Beechwood-c.1 km/c. 13 minutes walking distance/c.4 minutes cycling distance:</b>			
Mima Coffee Company	Mortons Store	The Best of Italy Store	Peperina Garden Bistro
Keegans Laundrette	Dunville Pharmacy		
<b>Rathmines-c.1.8-2.2 km/c.22-c.28 minutes walking distance/c.6-c.8 minutes cycling distance</b>			
The Swan Shopping Centre [which includes Omniplex Cinema Rathmines, McDonald's Restaurant, Dunnes Stores, Starbucks, Butlers Chocolate Café, and Elephant and Castle Restaurant for example],	The Stella Cinema	Eddie Rockets	Copán Bar
Lenehans Bar and Grill,	Rody Bolands Bar	Blackbird Pub	Tesco Metro
Tesco Express	Lidl	Aldi	Rathmines Post Office
Saba to Go	Bombay Pantry	Tolteca Restaurant	Umi Falafel
Farmer Browns Restaurant	Camille Thai Restaurant	Uno Pizza	Dominos Pizza
Apache Pizza	Subway	Baked Café	The Laundry and Dry Cleaning Shop
The Cartridge Shop	Nethouse Internet Café	Doctors Clinic Rathmines	Rafter's Medical Centre

Dental Flair	Peter Marks Hairdressers	Heaven Beauty Salon	Daniel and Andrew Hair Salon
Rathmines Library	EBS Bank	Bank of Ireland	Rathmines Life Pharmacy
Boots Pharmacy			

**Table 5.9: Services and Facilities in Close Proximity to the Subject Site**

**(Source: Google Maps, 2021)**

In addition, the local area is also well served by educational facilities within 2 km of the site. This is demonstrated in the Social Infrastructure Audit prepared by Future Analytics Consulting which is enclosed as a separate document. Please see Figure 5.4 below which demonstrates the wide range of educational facilities located within 2 km of the site.



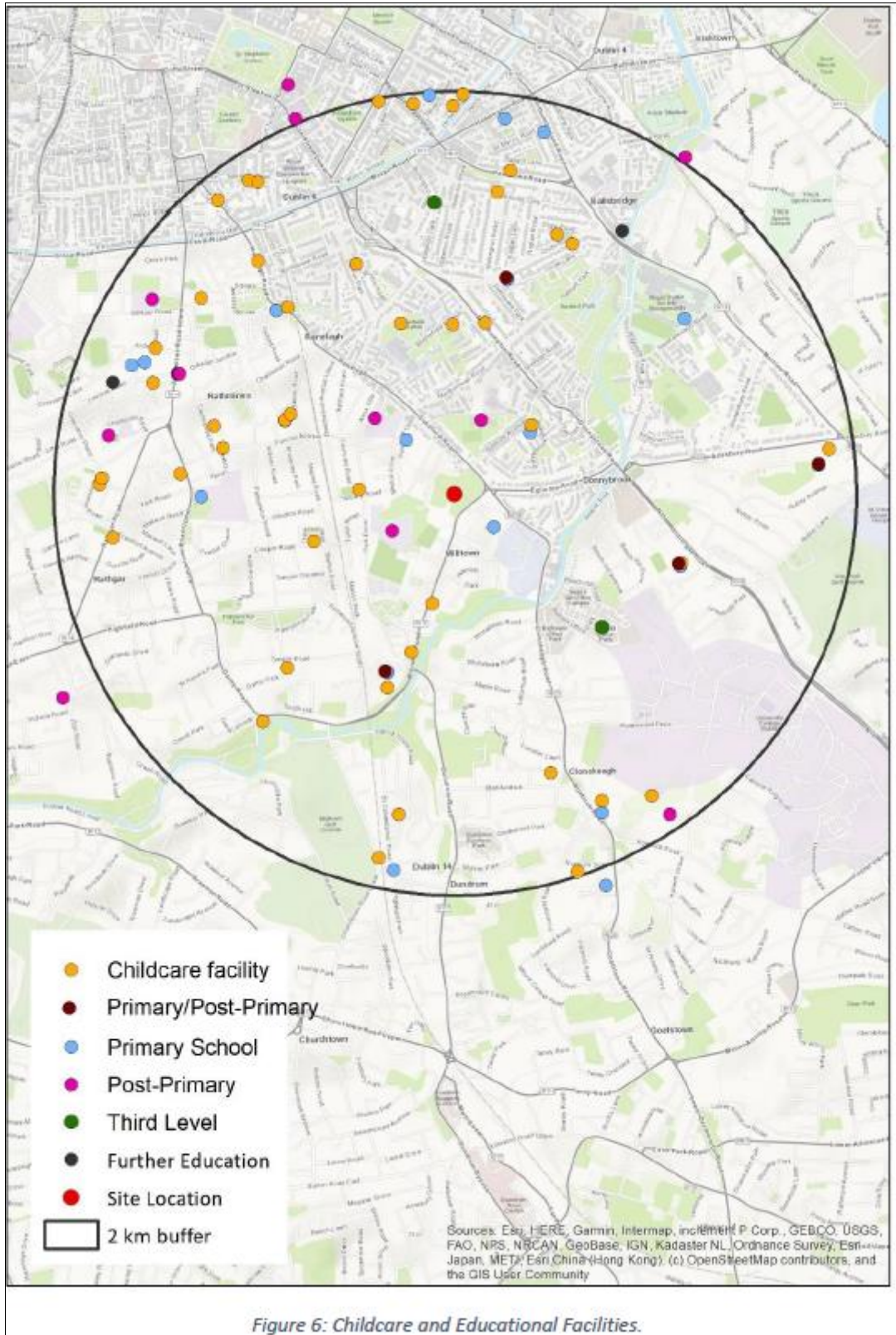


Figure 5.4: Map of Childcare and Education Facilities Within 2km of the Subject Site

(Source: Social Infrastructure Audit Enclosed Separately and Prepared by KPMG Future Analytics, 2021)

The Childcare Demand Assessment prepared by KPMG Future Analytics which is enclosed separately concludes that c. 13 No. childcare spaces could be required by the proposed development. The Audit concludes that there is capacity for c. 16-17 No. childcare spaces within a 2 km radius of the subject site. The Social Infrastructure Audit also prepared by KPMG Future Analytics notes that there is capacity for c. 162-163 No. pupils in primary schools in the area with the proposed development generating a demand for c. 66 No. pupils. The Assessment also notes that the development will generate a demand for c. 29 No. post-primary school places. The Audit concludes that there is capacity within 2 km of the proposed development for 35 No. pupils in existing post-primary schools. Marian College confirmed that there is available capacity in the school but were unable to quantify exact numbers at the time of writing. The Report notes that there was a modest response rate for post-primary schools (c. 50%) owing to the time of year that the consultation took place, and thus it is reasonable to conclude that further additional capacity beyond the capacity for c. 35 No. pupils is available within the study area.

The Social Infrastructure Audit concludes that the existing social infrastructure provision within close proximity to the subject site is capable of serving the population at the subject site.

In terms of health services and facilities, the Social infrastructure Audit notes:

*'Clonskeagh Hospital and Ranelagh Medical are located within close proximity to the subject site. Clonskeagh Hospital provides an array of services, including mental health services and services for older people, while Ranelagh Medical provides an extensive range of services, inclusive of medical and counselling. In addition to these services and facilities, St. Vincent's University Hospital, Day Hospital, The Royal Hospital Donnybrook and St. Luke's Hospital are all located within the Study Area. Furthermore, a large number of GPs and pharmacies are located in the Study Area (a total of 108 GPs and 36 pharmacies were identified during the baseline study). The existing provision results in a ratio of 1.7 GPs per 1,000 residents and 0.59 pharmacies per 1,000 residents which is above the recommended ratio of 0.29 GPs per 1,000 residents and 0.26 pharmacies per 1,000 residents.'*

We note that there is a variety of facilities and services located in close proximity to the subject site that the future residents of the scheme can utilise on foot or bicycle. The proposed scheme also provides a co-working space, gym, games room, lounges, reading rooms and a multi-purpose room for example to serve the future residents of the scheme. In addition, the significant quantum of public and communal open spaces provided throughout the development and the proposed permeable line through the public park and pedestrian boulevard is considered a unique planning gain for the area given that these lands were always in private use and not publicly accessible.

## **5.7 Potential Impacts Associated with the Development and Mitigation Measures Proposed**

### **5.7.1 Introduction**

This section considers any potential impacts that may occur on population and human health as a result of the proposed development during construction stage, operational stage and also any potential impacts that may arise if the development were not to proceed. We have

considered unplanned events throughout this Chapter with particular reference to population and human health.

## 5.7.2 Potential Impacts on Population Profile and Trends

### *Do Nothing Scenario*

If the proposed development were not to proceed, this underutilised core urban site would remain in its existing form and would fall into a state of decline. Up until 2019, the existing buildings and lands at the application site were formally utilised by the Jesuit Community for institutional purposes. The site sold to the Applicant comprises a range of institutional buildings and large unutilised green spaces which have become surplus to the Jesuit Community's requirements due to a decline in vocations and are no longer required for the purposes of its function and mission.

The buildings are now vacant and were impossible to maintain by the Jesuit Community, which has left the site redundant and ultimately lead to its sale to the Applicant.

If the site is not developed, this would be a waste of scarce brownfield land in a sustainable location at a time of an acute housing need, located in close proximity to many services and facilities. We note that as discussed in Section 5.4.2, the Rathmines East B ED has an average household size of 2.3 No. persons however a large number of households comprise 4 No. or more rooms. Therefore, it is important to provide mix of unit types, particularly catering for smaller household formations by providing a mix of studio, 1, 2 and 3 No. bedroom units at the subject site.

Ultimately if the proposed development does not proceed there would still be a dearth in the provision of smaller dwelling types for persons seeking to purchase or rent a smaller dwelling, whether it is a family home, a trade down unit or a young couple seeking to rent an apartment for example, which is considered a negative impact on the population.

The proposed mix of dwelling types (99 No. studios, 271 No. 1 beds, 274 No. 2 beds and 27 No. 3 beds) (including both the Build-to-Sell units and Build-to-Rent units) which are generally not provided for in the area will result in a positive impact for the population. The Build-to-Rent element of the scheme will provide rental options in the area whilst the Build-to-Sell units will provide an opportunity for people to purchase dwellings within the scheme and as such the scheme will cater for a wide cohort of persons.

### *Construction Phase*

The proposed development is planned to be constructed on a phased basis over 34 No. months. It is estimated that there will be c. 4 No. phases during the construction stage as follows:

Phase	Works	Estimated Time	Outline Works
Phase 1	Site Set Up, Enabling Works and Demolitions	Months 1-5	<i>Site Set Up for all Blocks.</i> <ul style="list-style-type: none"> <li>• Site cabin delivery and placement;</li> <li>• Completion of all outstanding required surveys;</li> <li>• Contractor temporary service installations etc.;</li> <li>• Construction of appropriate hoarding to neighbouring properties;</li> </ul>

			<ul style="list-style-type: none"> <li>• Installation of CCTV coverage or other agreed security means;</li> <li>• Set up of required noise, dust, vibration monitoring stations, receptors in predetermined areas closest to sensitive locations as defined by the grant of planning;</li> <li>• Review environmental controls defined within the EIAR;</li> <li>• Tree protection installed;</li> <li>• Connection to new main temporary power board to feed the following: <ul style="list-style-type: none"> <li>○ site security load   requirements; and</li> <li>○ all storage area requirements.</li> </ul> </li> </ul> <p><i>Demolition and Enabling Phase</i></p> <ul style="list-style-type: none"> <li>• Remove all debris and rubbish from the site area to licensed tips;</li> <li>• Disposal or re-use of demolition materials will be carried out in accordance with the Development Construction and Demolition Waste Management Plan as prepared by AWN Consulting (see Appendix 14.1 of this EIAR);</li> <li>• Ensure, following the demolition of the buildings (or part thereof), the site shall be left in a tidy and safe condition in agreement with the client project manager;</li> <li>• Ensure measures shall be taken to ensure that the existing services in the vicinity of each structure are not affected by the demolition works;</li> <li>• Protection measures for all retained Buildings to be agreed and installed in advance of any works commencing onsite;</li> <li>• Review of temporary work to site boundaries with adjoining houses and liaison protocol with owners;</li> <li>• Forming of opening in boundary wall onto Milltown Road for construction access and protection of existing boundary walls;</li> <li>• Installation of haul road through site onto Milltown Road;</li> </ul>
<b>Phase 2</b>	Basement Box	Months 2-10	<p><i>Basement Works Phase</i></p> <ul style="list-style-type: none"> <li>• The development will include a single level basement under Blocks A,B &amp; C to accommodate car parking spaces, bicycle parking, storage, services and plant areas.</li> <li>• Substructure works i.e., groundworks, formwork, basement creation (up to ground floor podium), rising concrete elements attenuation and drainage etc. will be completed during this phase.</li> </ul>
<b>Phase 3</b>	Block D & F Apartment Blocks, Tabor	Months 5-24 → Tabor House and Chapel	<p><i>Tabor House &amp; The Chapel Refurbishment</i></p> <ul style="list-style-type: none"> <li>• Isolation of all power and services to the existing building;</li> </ul>

	House, Chapel and Duplexes (Block E)	<p>Months 5-20</p> <p>→ Blocks D and E (duplexes) Months 6-19</p> <p>→ Block F Months 6-24</p>	<ul style="list-style-type: none"> <li>• Soft strip areas deemed to be safe and not contaminated within each structure;</li> <li>• Ensuring primary elements of building structures not to be disturbed during soft strip works;</li> <li>• Appropriate temporary works as required will be installed to stabilise external walls prior to any internal remodelling taking place, beyond those needed during the initial demolition phase;</li> <li>• Construction materials will be loaded out by crane and will follow in accordance with the construction programme;</li> <li>• Replacement windows and roof elements (as required) will be fixed as the phase progresses to maintain water tightness;</li> <li>• Internal Works – Services, Carpentry, Fit Out, Painting, Joinery etc;</li> <li>• Landscaping;</li> <li>• Handover;</li> </ul> <p><i>Residential Block Construction</i></p> <ul style="list-style-type: none"> <li>• Blocks D,E,F Substructure;</li> <li>• Blocks D,E,F Construction of superstructure and vertical elements;</li> <li>• Blocks D,E,F Construction of façade elements. This phase will be erected as soon as possible to commence waterproofing to the floors so fit out works can commence;</li> <li>• Block D,E, F Fit Out;</li> <li>• Snagging / Commissioning / BCAR / Handover;</li> <li>• Landscaping and External Works;</li> </ul>
<b>Phase 4</b>	Block A1, A2, B, C	<p>Months 7-35</p> <p>→ Blocks A1 and A2 Months 7-35</p> <p>→ Block B Months 7-35</p> <p>→ Block C Months 11-35</p>	<p><i>Residential Block Construction</i></p> <ul style="list-style-type: none"> <li>• Mobilisation;</li> <li>• Block A substructure (outside of basement footprint);</li> <li>• Block A Construction of superstructure and vertical elements;</li> <li>• Block A Construction of façade elements. This phase will be erected as soon as possible to commence waterproofing to the floors so fit out works can commence;</li> <li>• Block A Fit Out;</li> <li>• Snagging / Commissioning / BCAR / Handover;</li> <li>• Block B &amp; C substructure (outside of basement footprint);</li> <li>• Block A &amp; C Construction of superstructure and vertical elements;</li> <li>• Block B &amp; C Construction of façade elements. This phase will be erected as soon as possible to commence waterproofing to the floors so fit out works can commence;</li> <li>• Block B &amp; C Fit Out;</li> <li>• Snagging / Commissioning / BCAR / Handover;</li> <li>• Basement Fit Out;</li> <li>• Landscaping and External Works</li> </ul>





**Figure 5.5: Proposed Phasing Plan Layout demonstrating Construction Accesses [Red Dashed Line indicates the Divide Between Phase 3 and 4]**

**(Source: Lafferty Project Managers, 2021)**

The typical working hours are proposed to be 07:00 to 19:00 Monday to Friday (excluding bank holidays) and 09:00 to 13:00 Saturdays, subject to any condition attached in a grant of permission. No work will take place on Sundays and Public Holidays. Subject to the agreement of the Local Authority, out of hours working may be required for water main connections, foul drainage connections etc.

In the short term the local population may be impacted during the construction period due to the influx of construction workers, traffic, noise and dust. However, we note that mitigation measures will be put in place to minimise such impacts which are discussed in other sections of the EIAR such as the Noise and Vibration Chapter (Chapter 13) and the Traffic and Transportation Chapter (Chapter 15) in addition to the Infrastructure Report and Preliminary Construction Management Plan submitted separate to the EIAR and prepared by DBFL Consulting Engineers.

There will be a neutral impact on population trends and profile for the area as no additional persons will be accommodated at the subject lands during construction.

### **Operational Phase**

As noted previously, the provision of 671 No. units comprising 604 No. Build-to-Rent and 67 No. Build-to-Sell units will provide a choice in tenure for people seeking to purchase or rent a home in the area. In addition to providing a choice of dwelling types, the provision of the proposed additional 671 No. units at the subject lands will significantly contribute towards

alleviating the housing crisis being experienced in Ireland, which is a positive impact associated with the proposed development.

The scheme will provide permeable links through the site through the provision of a public park, pedestrian boulevard, new pedestrian entrances and the facilitation of future potential links to the remaining institutional lands to the south-east (if required for redevelopment in the future). The scheme also provides a significant quantum of public open space (14,848 sq m/34.9% of site area) which will be provided as follows:

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



Figure 5.6: Public Open Space Provision at the Subject Lands

(Source: Cameo and Partners Design Studio, 2021)



**Figure 5.7: 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 provision of extensive public open space will be a positive improvement for the area, particularly as the site will be opened up for the first time to the public (as the lands have always been in private use by the Jesuit Community). The scheme has incorporated a number of measures in the proposed public open spaces such as the provision of exercise and play equipment to encourage physical activity which will have a positive impact on the health and wellbeing of residents and visitors. In addition, a creche is provided in the development, which as well as benefiting the future residents, it will also cater for the immediate existing residents of the area, and thus will enhance the amenity of the area.

### ***Proposed Mitigation Measures***

The development will have a long-term positive impact on population due to the provision of a wide range of dwelling unit types which includes provision for Part V units and will cater

for a wide cohort of persons. As noted, during the construction phase the local population may be temporarily impacted due to the influx of construction traffic, noise and dust.

However, we note that these impacts are short-term and mitigation measures will be put in place to minimise such impacts which are discussed in other sections of this EIAR including the implementation of a Dust Management Plan, a Mobility Management Plan and Parking Strategy. Please see further details in Chapter 12 (Air Quality and Climate) and Chapter 15 (Transportation).

### 5.7.3 Potential Impacts on Housing

#### *Do Nothing*

The subject developable lands comprise an area of c. 4.26 hectares and currently comprises a building range which consists of the original Milltown Park House building with 5 No. extensions attached to the original structure.

The existing plot ratio of the development site (c. 4.26 Ha) is 0.17 which is completely unsustainable at this strategically located large plot of underutilised land in close proximity to a wide range of services, facilities and public transport. If this prime urban site is left undeveloped, this would not represent the sustainable development of Dublin City which would be a negative impact as suitable housing would not be provided on this large and well-located urban site.

#### *Construction Phase*

As noted in Section 5.7.2, in the short term the local area will be impacted during the construction period due the influx of construction workers, traffic, noise and dust. However, this unavoidable impact is associated with any new development and is not considered long-term/permanent. The existing building range which is no longer required by the Jesuit Community has been vacant since 2019 which has left the site redundant and thus there will be no loss of housing units during the construction phase.

#### *Operational Phase*

As discussed in Section 5.4, the proposed development will provide a variety of housing typologies in an area that requires smaller dwelling units having regard to the average household size of the Electoral Division which is 2.3 persons per unit. The addition of 671 No. units to an existing residential area will be a positive addition to the availability of housing in the Rathmines East B Electoral Division and in Dublin City and will cater for a wide cohort of persons.

#### *Proposed Mitigation Measures*

It is considered that the proposed development of 671 No. units will be a positive addition to the availability of housing in the area by providing a wide choice in tenure for a range of persons. The short-term impacts associated with the construction stage are associated with any new development and will not be significant once mitigation measures which have been outlined extensively in other sections of this EIAR such as the Noise and Vibration Chapter (Chapter 13) and the Transportation Chapter (Chapter 15) of the EIAR in addition to the implementation of the Preliminary Construction Management Plan and Outline

Construction and Environmental Management Plan submitted as separate documents. Additional mitigation measures include the implementation of a Dust Management Plan, Mobility Management Plan and Parking Strategy.

#### 5.7.4 Potential Impacts on Employment/Economy

##### *Do Nothing*

The subject site in its current form does not provide any employment for the area, except for the occasional maintenance jobs required at the site such as security. If undeveloped, there would be no benefit for local employment as there is very limited employment potential associated with the subject undeveloped lands. The buildings will fall into a state of disrepair as the Jesuit Community no longer require the buildings or lands.

##### *Construction Phase*

As a result of the construction of the proposed development, c. 550 No. workers will be directly employed during the construction period in addition to c. 40 No. indirect workers (e.g. marketing, suppliers etc.). This increase in employment will clearly have a positive impact on existing population in the area as there would be employment opportunities for any workers living in the wider area surrounding the subject lands. We also note that additional workers on the site will utilise local shops and other businesses in the surrounding areas during the construction phase which will benefit the local economy. Therefore, the impact of the proposed development on employment and the economy is considered positive.

##### *Operational Phase*

The proposed development will provide 671 No. dwelling units and a creche and will cater for a range of persons including families, older persons and young couples who will utilise existing services and amenities in the local area which will ultimately be a positive impact on the local economy. The subject development will also create jobs such as within the newly proposed creche and with the provision of a concierge for example, which would all result in additional employment opportunities being facilitated during the operation phase of the development. The additional residents on the site will also spend income in the local area which will benefit the local economy and will ultimately provide further employment opportunities for the area in the long term.

##### *Proposed Mitigation Measures*

The proposed development will have a significant positive impact on the economy and employment of the area due to the influx of jobs that will be created at construction and operation stages. We also note that during construction, local businesses will benefit from workers utilising their services and during the operational stage there will be an increased population at the subject lands which will support the local economy. New jobs will also be created at the subject lands during construction and operational stage. It is considered that the impact that will occur on employment and the local economy will be positive and long-term therefore no specific mitigation measures are proposed.



### 5.7.5 Potential Impacts on Local Services and Amenities

#### *Do Nothing*

If the development does not proceed there would be no change to the existing local services and amenities provision as there is currently no such provision at the subject lands which have always been in private use and not publicly available. As the application lands and buildings are vacant, there is nobody present at the site to support the local economy.

#### *Construction Phase*

There are existing services or amenities at the subject lands at present, therefore as such, there would be no potential for impacts associated with the site during the construction stage in this regard.

As noted previously, workers during the construction phase would utilise local shops for example therefore this will result in a positive short-term effect on the local services and amenities.

#### *Operational Phase*

The application site will be opened up to the public, allowing access to previously inaccessible private lands.

The public open space is provided as follows:

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



**Figure 5.8: Illustrations of the Proposed Transformed Public Park**

(Source: Cameo and Partners Design Studio, 2021)



**Figure 5.9: Illustrations of the Proposed Transformed Public Park**

(Source: Cameo and Partners Design Studio, 2021)





**Figure 5.10: Illustrations of the Archway Linking the Public Park and the Plaza Area (see Top Left Image Showing Bollards to Prevent Access to Plaza)**

**(Source: Cameo and Partners Design Studio, 2021)**

Therefore, a total of 14,848 sq m (c. 34.9% of the site area) has been designated as public open space at the application lands which is a significant planning gain for the area, particularly as the lands have never been publicly available.

The subject site has significant frontage onto Sandford Road and Milltown Road and this in tandem with the large quantum of public open space provision, facilitates the unique opportunity to provide permeable connections through the site. The development promotes permeable links through the provision of the following:

1. A new public park along the east of the site from Sandford Road to Milltown Road;
2. A pedestrian boulevard from Sandford Road through the plaza area, connecting through the pedestrian boulevard to the forecourt at the front of Tabor House and the Chapel (with access to Milltown Road also possible at this location). The ground and first floor levels of Block B have been set back (designed as a colonnade) to allow a visual connection through to Tabor House;
3. Some 2 No. new pedestrian gates will be provided at each vehicular access point from Sandford Road and Milltown Road; and
4. In addition to the pedestrian gates provided at the vehicular entrances, a pedestrian access point will be provided at the junction of Milltown Road and Sandford Road which demonstrates that ample permeable opportunities are provided in the proposed development.

Therefore, it is clear that the subject development will positively contribute to the amenity provision of the local area, particularly as there has never been such provision at the lands. As noted above, existing amenities in the area such as shops and restaurants will also benefit

from the increase in population at the site, as they will bring significantly increased spending power into the local economy. The provision of a creche within the development will also benefit the wider community.

### *Proposed Mitigation Measures*

As discussed previously, the proposed development will benefit the local economy as local shops and other amenities will benefit economically from the construction stage and operational stage. In addition, the significant quantum of public open space and permeable connections proposed will be an attractive addition to the area and represents a key planning gain for the wider neighbourhood.

The Childcare Demand Assessment enclosed as a separate document prepared by KPMG Future Analytics concludes that there is capacity in the existing childcare facilities in the area to cater for the proposed development. Although it has been concluded that sufficient capacity exists in the area, the Applicant has incorporated a crèche into the scheme, which as well as benefiting the future residents of the development, it will also cater for the immediate existing residents of the area, and thus enhancing the amenity of the area.

The Social Infrastructure Audit also prepared by KPMG Future Analytics noted that there is capacity for c. 162-163 No. pupils in primary schools in the area with the proposed development generating a demand for c. 66 No. pupils. The Assessment also notes that the development will generate a demand for c. 29 No. post-primary school places. The Audit concludes that there is capacity within 2 km of the proposed development for 35 No. pupils in existing post-primary schools. In addition, Marian College confirmed available capacity for male and female pupils but were unable to quantify exact numbers at the time of writing. The response rate for post-primary schools is a modest 50% owing to the time of year that the consultations took place and so it is reasonable to conclude that additional capacity for post primary students is available within the study area and is capable of accommodating additional demand generated by the proposed development.

Therefore, the existing schools in the area can absorb the limited demand predicted to arise from the subject development. The provision of a crèche will ultimately increase the capacity of childcare facilities for the area and the significant quantum of public open space and permeable connections proposed will be an attractive and positive addition to the area, particularly as there has never been such provision for public open space or permeable connections at the lands as 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.

## **5.7.6 Potential Impacts on Health and Safety**

### *Do Nothing*

If the development did not proceed, this large site would principally remain in a vacant state. This could have a potentially negative effect on health and safety for security reasons as the large extent of the open site could encourage antisocial behaviour to take place at the subject lands. The buildings will also fall into disrepair which also represents the opportunity for anti-social behaviour to occur.

### *Construction Phase*

All new developments will consist of associated short-term impacts and disturbances to the surrounding areas e.g. construction traffic and demolition of buildings. However, we note that the health and safety of surrounding persons and properties etc., has been a key consideration in the preparation of the Preliminary Construction Management Plan (enclosed separately) and various EIAR Chapters such as the Air Quality and Climate Chapter (Chapter 12) (including potential impacts arising from dust and traffic emissions), Noise and Vibration Chapter (Chapter 13) (including potential impacts arising from construction noise, plant selections) and Transportation Chapter (Chapter 15) (including potential impacts arising from construction traffic). The construction of the proposed development will have a neutral and imperceptible impact on health and safety, provided all mitigation measures outlined in the EIAR are adhered to as well as the Preliminary Construction Management Plan and Outline Construction and Environmental Management Plan.

### *Operational Phase*

During the operational stage of the development, traffic safety is the most significant concern when considering health and safety. However, having regard to the high-quality nature of the scheme which includes a large quantum of public open space, the provision of permeable links through the site, and the fact that the design accords with DMURS, it is envisaged that no significant impacts will occur on health and safety as a result of the project.

### *Mitigation Measures*

Mitigation measures will be put in place to minimise any potential impacts on health and safety. The Contractor shall be responsible for overall management of the site for the duration of the proposed works and must progress their works with reasonable skill, care, diligence and to proactively manage the works in a manner most likely to ensure the safety and welfare of those carrying out construction works. The Contractor shall comply with all relevant Statutory requirements such as the 2005 Safety Health and Welfare at Work Act, The Construction Regulations (SI 291 of 2013), the General Application Regulations (SI 299 of 2007), etc. (and any amendments thereof). In addition, the Contractor shall comply with all the reasonable safety requirements of the Client, the Project Supervisor for the Design Process and the Project Supervisor for the Construction Stage. Measures that would be taken under these Statutory requirements include:

- Appointment of a competent project supervisor for the design process, and a competent project supervisor for the construction stage.
- Contractor to ensure that all staff have received site-specific safety induction instruction.
- Appointment of a safety officer.
- Safe means of access to and egress from site are provided and maintained.

To negate any potential impacts during construction stage, a dust management plan will be implemented. In addition, the site will be securely fenced off from adjacent properties, public footpaths and roads.



As set out in Chapter 15 of this EIAR 'Transportation':

*'An Outline Construction and Environmental Management Plan (CEMP) has been prepared as part of the planning application with an associated Preliminary Construction Management Plan (PCMP). The PCMP includes an Outline Traffic Management Plan as well as incorporating a range of integrated control measures and associated management activities with the objective of minimising the potential impacts of construction activities associated with the development. The following initiatives will be implemented to avoid, minimise and/or mitigate against the anticipated construction period impacts:*

- *During the pre-construction phase, the site will be securely fenced off/hoarded off from adjacent properties, public footpaths and roads;*
- *Appropriate on-site parking (temporary parking for the duration of construction works) and compound area will be provided to prevent overflow onto the local network;*
- *A large proportion of construction workers are anticipated to arrive in shared transport and car sharing will be encouraged. It is likely that some numbers of the construction team will be brought to/from the site in vans/minibuses, which will serve to reduce the trip generation potential;*
- *Delivery vehicles to and from the site will be spread across the course of the working day, therefore, the number of HGVs travelling during the peak hours will be relatively low;*
- *Truck wheel washes will be installed at construction entrances;*
- *Any specific recommendations with regard to construction traffic management made by Dublin City Council will be adhered to;*
- *Potential localised traffic disruptions during the construction phase will be mitigated through the implementation of industry standard traffic management measures such as the use of traffic signage. These traffic management measures shall be designed and implemented in accordance with the Department of Transport's Traffic Signs Manual "Chapter 8 Temporary Traffic Measures and Signs for Roadworks" and "Guidance for the Control and Management of Traffic at Roads Works – 2nd Edition" (2010);*
- *Site entrance point/s from the public road will be constructed with a bound, durable surface capable of withstanding heavy loads and with a sealed joint between the access and public highway. This durable bound surface will be constructed for a distance of 10m from the public road;*
- *Material storage zones will be established in the compound area and will include material recycling areas and facilities;*
- *'Way finding' signage will be provided to route staff / deliveries into the site and to designated compound / construction areas;*

- *Dedicated construction haul routes will be identified and agreed with Dublin City Council prior to commencement of activities on-site; and*
- *On completion of the works, all construction materials, debris, temporary hardstands etc. from the site compound will be removed off-site and the site compound area reinstated in full on completion of the works.'*

The mitigation measures proposed during the operational stage include the implementation of the Parking Management Strategy, Mobility Management Plan, provision of ample cycle parking, junction enhancements and promotion of car sharing which will encourage the use of sustainable transport modes which will ultimately negate any potential impacts on the health and safety of the population in relation to traffic safety. The scheme is fully in accordance with the *Design Manual for Urban Roads and Streets*.

Furthermore, a Daylight/Sunlight Report has been prepared by 3D Design Bureau which concludes that the design approach taken has ensured that no significant adverse impacts will occur on daylight/sunlight infiltration to neighbouring properties and that levels of daylight and sunlight within the scheme will provide a high-quality level of amenity for future residents. Please see Appendix 5.1 for the Review of the BRE Sunlight and Daylight Assessment prepared by 3D Design Bureau, which accompanies this EIAR. A full Daylight and Sunlight Assessment Report prepared by 3D Design Bureau is also enclosed separately.

A Risk Management Chapter has been completed by Enviroguide Consulting and is included as Chapter 18 which notes that the design has considered the potential for flooding, road accidents or fire within the design methodology. The vulnerability of the proposed development to major accidents and/or disasters is not considered significant. Control measures will put in place for health and safety and environmental management as per conditions of the planning permission, relevant code of practices and relevant legislation. The residual impacts will be negligible once all control, mitigation and monitoring measures have been implemented.

#### **5.7.7 Potential Impacts on Traffic/Commuter Patterns**

##### ***Do Nothing***

If the proposed development did not proceed, the existing traffic situation would remain as it currently stands, therefore this would result in a neutral impact. However, if the development were not provided at the subject lands, there would be a potential negative impact for pedestrians and cyclists in the local area as the significantly enhanced pedestrian and cycle permeability through the site would not be provided to shorten journeys to public transport, services and facilities which is considered negative for the local community. In addition, if the site is not developed, people will be required to commute further to surrounding employment which is considered a negative impact.

##### ***Construction Phase***

During the construction phase, the construction access points will be off Milltown Road at the location of the newly proposed primary vehicular access for the development. An additional construction access is proposed at the existing entrance from Sandford Road. Works are also proposed on Milltown Road and Sandford Road including new toucan

crossings. The use of both / either entrances will be coordinated with the phasing of the development. A Preliminary Construction Management Plan prepared by DBFL Consulting Engineers is enclosed as a separate document with this application. We also note that a Transportation EIA Chapter (Chapter 15) has also been prepared by DBFL Consulting Engineers.

As associated with all new developments, there will be a slight temporary negative impact on the surrounding area during construction stage arising from construction traffic entering and exiting the site and their associated noise, dust and slight nuisance. However, these issues can be appropriately mitigated as set out in Chapter 12 (Air Quality and Climate) 13 (Noise and Vibration) and 15 (Transportation) of this EIA.

The Preliminary Construction Management Plan enclosed separately with this application also notes that a Traffic Management Plan (TMP) will be prepared for the site works which will minimise disruption to the adjacent road network (Outline Traffic Management Plan provided within the PCMP).

### ***Operational Phase***

The subject site is well located on a prominent site fronting the junction of Sandford Road and Milltown Road, which is a key arterial crossroads between Milltown, Clonskeagh, Donnybrook and Ranelagh, within easy walking distance of the Green Line Luas (Beechwood is located 1 km / 13 No. minute walk) in addition to various bus stops. The Green Line Luas allows easy access to a significant quantum of employment locations throughout the City Centre, North and South Dublin City, North and South of Dublin County in addition to the opportunity for users to change onto the Red Line Luas at O'Connell Street/Abbey Street which would provide access to employment locations to the east and west of the City Centre.

A large variety of business districts and employment locations can be easily accessed by public transport and many are also within easy cycling and walking distance of the subject site such as the Canal, the Docklands, Harcourt Street, Belfield Office Park, Ballsbridge, Clonskeagh Hospital, The Royal Hospital Donnybrook, Saint Vincent's Hospital, Saint Luke's Hospital, University College Dublin, Sandyford Business District, Ranelagh and Rathmines for example.

The site is also provided with high quality walking and cycling facilities and is in proximity to a wide range of services and facilities (in addition to employment locations as discussed above), therefore sustainable modes of transport will be promoted.

The accessible urban location of the subject site will ultimately promote sustainable commuter patterns.

The proposed development provides a reduced car parking ratio of 0.50 No. spaces per unit for the residential units which will encourage sustainable modes of transport from the subject site. Please see Chapter 15 (Transportation) for further details on traffic and transport associated with the proposed development at operational stage. As will be noted below in the mitigation measures section, sustainable modes of transport are encouraged as part of the proposed development.

### *Proposed Mitigation Measures*

The scheme will be developed in line with the Transportation Chapter (Chapter 15 of this EIAR), the separately enclosed Preliminary Construction Management Plan (PCMP) and Outline Construction and Environmental Management Plan (CEMP) to ensure any impacts on local traffic is minimised during the construction stage. Chapter 15 notes that a large proportion of construction workers are anticipated to arrive in shared transport therefore reducing the quantum of vehicles arriving at the site during construction, which will therefore minimise any potential impacts on the surrounding road network during construction.

As discussed, the promotion of sustainable modes of transport from the site during the operational stage will significantly mitigate against any potential impacts that may arise on traffic in the area. Please see Chapter 15 (Transportation) which details the proposed development further in relation to potential traffic impacts and mitigation measures which include the implementation of a Parking Management Strategy, Mobility Management Plan, provision of ample cycle parking, junction enhancements and promotion of car sharing. We note that the scheme has been designed in line with the *Design Manual for Urban Roads and Streets*.

## **5.7.8 Potential Impacts on Human Health (Environmental)**

### **5.7.8.1 Water and Hydrology**

#### *Do Nothing*

If the site remained in its current form, there would be no change to human health in terms of the water environment.

#### *Construction Phase*

The potential impacts of the proposed development on water and hydrology in the area during the construction stage (such as accidental leaks and spills, concrete run off, discharge of vehicle wash water from concrete trucks, dewatering excavations, compound discharge and cross contamination of potable water supply to construction compound) are fully assessed in the Water & Hydrology Chapter (Chapter 11). This Chapter sets out that the implementation of the measures outlined within the Chapter (summarised in mitigation measures section below) will ensure that the potential impacts do not occur on water and hydrology and ultimately there is anticipated to be no impact on population and human health in this regard.

#### *Operational Phase*

The potential impacts of the proposed development on water and hydrology in in the area during the operation stage (such as increased impermeable surface area potentially reducing ground water recharge and potentially increasing surface water runoff, accidental hydrocarbon leaks and subsequent discharge into piped surface water drainage network, increased discharge to foul drainage network and increased potable water consumption) are fully assessed under Chapter 11 (Water & Hydrology) of this EIAR. As set out in Chapter 11 (Water-Hydrology), surface water drainage has been carried out in accordance with Greater Dublin Strategic Drainage Study (GSDSDS) and SuDS methodologies will be implemented,

therefore no predicted impacts on water and hydrology will arise during the operational stage.

### *Proposed Mitigation Measures*

A number of mitigation measures are set out in Chapter 11 which include the following:

#### Construction Stage

- A Preliminary Construction Management Plan has been prepared as part of this application and is to be implemented during the construction phase. Site inductions will include reference to the procedures and best practice as outlined in the Preliminary Construction Management Plan. An Outline Construction and Environmental Management Plan (CEMP) has been prepared as part of the planning application and will be implemented during the construction phase.
- Weather conditions and typical seasonal weather variations will also be taken account of when planning stripping of topsoil and excavations with an objective of minimizing soil erosion.
- In order to mitigate against spillages contaminating the surrounding surface water and hydrogeological environments, all oils, fuels, paints and other chemicals will be stored in a secure bunded hardstand area. Refuelling and servicing of construction machinery will take place in a designated hardstand area (where not possible to carry out such activities off site).
- Concrete batching (for use in in situ concrete pours) will take place off site and wash down and wash out of concrete trucks will take place off site (at authorized concrete batching plant in full compliance with relevant planning and environmental consents).
- The construction compound will include adequate staff welfare facilities including foul drainage and potable water supply. Foul drainage discharge from the construction compound will be tankered off site to a licensed facility until a connection to the public foul drainage network has been established.
- The construction compound's potable water supply shall be protected from contamination by any construction activities or materials. The contractor shall obtain a temporary connection from the existing water supply network along Milltown Road / Sandford Road in accordance with Irish water requirements for same.

#### Operation Stage

Proposed mitigation measures to address residual flood risks are summarised below;

- Proposed drainage system to be maintained on a regular basis to reduce the risk of a blockage.



- Overland flow routes, directed towards open space areas, are identified / established in the event of storms exceeding the 1% AEP design capacity of the attenuation system.

The development's basement shall not have an adverse effect on the existing ground water regime as the basement extends into the low porosity boulder clays (refer to DBFL's Basement Impact Assessment for the proposed development).

Surface water runoff from the site will be attenuated to the greenfield runoff rate as outlined in the Greater Dublin Strategic Drainage Study (GSDSDS). Surface water discharge rates will be controlled by a Hydrobrake type vortex control device in conjunction with below ground attenuation storage.

The following methodologies are being implemented as part of a SuDS surface water treatment train approach:

- Permeable paving in driveway areas.
- Surface water runoff from duplex roofs will be routed to the proposed surface water pipe network via the porous aggregates beneath permeable paved driveways.
- Surface water runoff from apartment roofs will be captured by green roofs (sedum blanket) prior to being routed to the piped surface water drainage network.
- Surface water runoff from the majority of site's internal street network will be directed to the proposed pipe network via tree pits or other SUDS features (with overflows to conventional road gullies). Part of the site's internal street network (adjacent to Block E) drains via 3 No. bio-retention areas. In limited instances, surface water runoff from paved areas will be directed to the proposed pipe network via conventional road gullies.
- A drainage reservoir (drainage board) is to be provided on the podium slab over basement. The podium will have a mix of soft landscaping and permeable hard landscaping (over a drainage board which would serve as a reservoir).
- Attenuation of the 30 and 100-year return period storms (refer to DBFL Report 190226-rep-002, Infrastructure Design Report).
- Installation of a Hydrobrake (limiting surface water discharge from the site to 2.0 l/sec/ha).
- Surface water discharge will also pass via a fuel / oil separator (sized in accordance with permitted discharge from the site).

A contract will be entered into with a suitably qualified contractor for maintenance of the attenuation system, green roof installations, Hydrobrake and full retention fuel / oil separator noted above.

Irish Water have confirmed that based on the capacity currently available in the foul drainage and water supply networks and subject to a valid connection agreement being put in place the proposed connections can be facilitated.

No specific mitigation measures are proposed in relation to foul drainage however, all new foul drainage lines will be pressure tested and be subject to a CCTV survey in order to identify any possible defects prior to being made operational (in accordance with Irish Water's QA Field Inspection Requirement Manual).

No specific mitigation measures are proposed in relation to water supply, however, water conservation measures such as dual flush water cisterns and low flow taps will be included in the design.

The potential impact of climate change has been allowed for as follows;

- Pluvial flood risk - attenuation storage design allows for a 20% increase in rainfall intensities.
- Pluvial flood risk - drainage system design allows for a 20% increase in flows.
- Provision of min. freeboard (500mm) from 1% AEP as required by GSDS (mitigation against impact of climate change).

It is also noted that AWN's Hydrological Risk Assessment concludes that '*During operation the potential for an impact to ground or storm water is negligible and there are measures incorporated within the proposed development to manage stormwater run-off quality. These specific measures will provide further protection to the receiving soil and water environments*'.

### 5.7.8.2 Air Quality and Climate

#### *Do Nothing*

If the site remains in its current form, there would be no change to human health in terms of air quality and climate.

#### *Construction Phase*

Throughout the construction phase there may be potential for impacts to occur on human health such as dust emissions from machinery on site. Chapter 12 of this EIAR (Air Quality and Climate) sets out mitigation measures to minimise dust emissions during construction such as the implementation of a dust management plan (Appendix 12.2).

#### *Operational Phase*

The Air Quality and Climate Chapter notes that the impact of the proposed development on air quality and climate is predicted to be imperceptible with respect to the operational phase in the long term. Therefore, no site specific mitigation measures are required.

### *Proposed Mitigation Measures*

The Air Quality and Climate Chapter of the EIAR has set out detailed mitigation measures for the proposed development as follows in relation to air quality:

*'The main contractor will be responsible for the coordination, implementation and ongoing monitoring of the Dust Management Plan. The key aspects of controlling dust are listed below. Full details of the Dust Management Plan can be found in Appendix 12.2. These measures will be incorporated into the Construction Environmental Management Plan (CEMP) prepared for the site. An Outline CEMP has been prepared by Thornton O'Connor Town Planning and is enclosed separately.'*

The Dust Management Plan notes the following measures in summary:

- Prior to demolition blocks will be soft stripped inside buildings (retaining walls and windows in the rest of the building where possible, to provide a screen against dust).
- During the demolition process, water suppression will be used, preferably with a hand-held spray. Only the use of cutting, grinding or sawing equipment fitted or used in conjunction with a suitable dust suppression technique such as water sprays/local extraction will be used.
- Drop heights from conveyors, loading shovels, hoppers and other loading equipment will be minimised, if necessary fine water sprays should be employed.

In addition, a Preliminary Construction Management plan has been prepared by DBFL Consulting Engineers and is enclosed. In summary, the measures which will be implemented will include:

- Hard surface roads will be swept to remove mud and aggregate materials from their surface while any un-surfaced roads will be restricted to essential site traffic.
- Any road that has the potential to give rise to fugitive dust must be regularly watered, as appropriate, during dry and/or windy conditions.
- Vehicles using site roads will have their speed restricted, and this speed restriction must be enforced rigidly (on any un-surfaced site road, this will be 20 kph and on hard surfaced roads as site management dictates).
- Vehicles delivering material with dust potential (soil, aggregates etc.) will be enclosed or covered with tarpaulin at all times to restrict the escape of dust.
- Public roads outside the site will be inspected on a daily basis for cleanliness and cleaned as necessary.
- Debris, sediment, grit etc. captured by road sweeping vehicles is to be disposed off-site at a licensed facility.
- Vehicles exiting the site shall make use of a wheel wash facility where appropriate

prior to entering onto public roads.

- Material handling systems and site stockpiling of materials will be designed and laid out to minimise exposure to wind. Water misting or sprays will be used as required if particularly dusty activities are necessary during dry or windy periods.
- During movement of materials both on and off-site, trucks will be stringently covered with tarpaulin at all times. Before entrance onto public roads, trucks will be adequately inspected to ensure no potential for dust emissions.

At all times, these procedures will be strictly monitored and assessed. In the event of dust nuisance occurring outside the site boundary, movements of materials likely to raise dust would be curtailed and satisfactory procedures implemented to rectify the problem before the resumption of construction operations.

In relation to mitigation measures specific to climate, the prevention of on-site or delivery vehicles from leaving engines idling, even over short periods, and minimising the waste of materials due to poor timing or over ordering on site will aid to minimise the embodied carbon footprint of the site.

No site specific mitigation measures are required during operation stage.

The proposed development has been designed to minimise the impact to climate where possible during operation. Details of the measures to be incorporated into the design of the development are outlined below and within the Energy & Sustainability Report prepared in support of this planning application.

- UV free-LED fittings and timer controls are considerations being undertaken to improve the impact lighting may have on climate.
- A central building management system (BMS) will be used to check metering to monitor and optimise substantive energy use.
- A number of private and visitor bicycle spaces will be provided along with lower car parking ratios of 0.50 per unit to encourage sustainable modes of transport to residents.

### 5.7.8.3 Noise and Vibration

#### *Do Nothing*

If the site remains in its current form, there would be no change to human health in terms of noise and vibration.

#### *Construction Phase*

In the short term the local area may be impacted during the construction period due the influx of construction traffic, noise, vibrations and dust. However, we note that these impacts are temporary and are generally associated with all new developments in residential areas.

Chapter 13 notes that:

*'Demolition and piling activities are predicted to exceed the noise threshold of 70dB(A) ...above which a significant noise impact can occur. However, this significant impact is only predicted to occur when works occur at the closest proximity to the dwellings located on the boundary of the site. In addition, it should be noted that the assessment considers all site equipment to be occurring simultaneously, however, it is unlikely that all items of plant will be in operational simultaneously. Additionally, the predictions only indicate a potential significant noise effect (based on a worst-case scenario) when working at the closest location to the dwellings, with lesser impacts predicted at all other locations across site... It is possible that vibration from construction activities will be perceptible at receptor locations, but not of the magnitude that would cause disturbance'.*

Please see proposed mitigation measures in the section below.

### **Operational Phase**

The primary sources of outward noise that are deemed long term are mechanical plant items that will serve the development and traffic travelling to and from the development. Inward noise from road sources will also be incident on the development buildings. Chapter 13 concludes that the residual impacts at operation stage will be imperceptible (once cumulative plant noise emissions from the development are designed to achieve the appropriate noise criteria in relation to mechanical plant and services noise and once measures with respect to entertainment noise are implemented). This assessment has also considered the traffic flows associated with the operation of the proposed development.

### **Proposed Mitigation Measures**

As set out in the Noise and Vibration Chapter, best practice control measures for noise and vibration from construction sites are found within BS 5228 (2009 +A1 2014) *Code of Practice for Noise and Vibration Control on Construction and Open Sites Parts 1 and 2*. Whilst construction noise and vibration impacts are expected to vary during the construction phase depending on the distance between the activities and noise sensitive buildings, the contractor will ensure that all best practice noise and vibration control methods will be used, as necessary in order to ensure impacts at off-site Noise Sensitive Locations are minimised.

The best practice measures set out in BS 5228-1 and BS 5228-2 includes guidance on several aspects of construction site mitigation measures, including, but not limited to:

- selection of quiet plant;
- noise control at source;
- screening; and
- liaison with the public.

Construction activities will vary depending on the phase of construction. The following matrix identifies which mitigation measures are applicable to the various phases.



Construction Phase		Mitigation Measure			
		Selection of quiet plant	Noise control at source	Piling	Screening
Site Preparation		X	X		X
Demolition		X	X		X
Foundations	Option A	X	X		X
	Option B	X	X	X	X
	Option C	X	X		X
General Construction		X	X		X
Landscaping		X	X		X
		Liaison with Public	Project Programme	Monitoring	General Measures
Site Preparation		X	X	X	X
Demolition		X	X	X	X
Foundations	Option A	X	X	X	X
	Option B	X	X	X	X
	Option C	X	X	X	X
General Construction		X	X	X	X
Landscaping		X	X		X

The following general good practice measures include:

- The contractor will appoint a site representative responsible for matters relating to noise.
- A noise and vibration monitoring specialist will be appointed to periodically carry out independent monitoring of noise and vibration during random intervals and at sensitive locations for comparison with limits and background levels.
- All ancillary pneumatic percussive tools shall be fitted with mufflers or silencers of the type recommended by the manufacturers, and where commercially available, dampened tools and accessories shall be used.

In addition, the Preliminary Construction Management Plan submitted separately recommends the following mitigation measures in relation to noise and vibration:

- Erection of a barrier (e.g. Standard 2.4m high construction hoarding) to remove direct line of sight between noise source and receiver when construction works are being carried out in proximity to noise sensitive receivers.
- Establishing channels of communication between the contractor, local authority and residents.
- Appointing a site representative responsible for matters relating to noise.

- A noise and vibration monitoring specialist will be appointed to periodically carry out independent monitoring of noise and vibration during random intervals and at sensitive locations for comparison with limits and background levels.
- Selection of plant with low inherent potential for generation of noise.
- Siting of noisy plant as far away from sensitive properties as permitted by site constraints and implementation of noise reduction measures such as acoustic enclosures.
- Avoid unnecessary revving of engines and switch off plant when idle.
- All vehicles and mechanical plant used for the purpose of the works shall be fitted with effective exhaust silencers and shall be maintained in good and efficient working order. In addition, all diesel engine powered plant shall be fitted with effective air intake silencers.
- All ancillary pneumatic percussive tools shall be fitted with mufflers or silences of the type recommended by the manufacturers, and where commercially available, dampened tools and accessories shall be used.

During the operation stage, Chapter 13 notes that as part of the detailed design of the development, plant items with appropriate noise ratings and, where necessary, appropriately selected remedial measures (e.g. enclosures, silencers etc.) will be specified in order that the adopted plant noise criteria is achieved at the façades of noise sensitive properties, including those within the development itself. Mitigation measures and forms of noise control techniques proposed at operation stage are as follows:

- Reduced/quiet modes;
- Duct mounted attenuators on the atmosphere side of air moving plant;
- Splitter attenuators or acoustic louvres providing free ventilation to internal plant areas;
- Solid barriers screening any external plant; and
- Anti-vibration mounts on reciprocating plant.

In addition to the above, it is proposed that the following practices are adopted to minimise potential noise disturbance for neighbours.

- All mechanical plant items e.g. motors, pumps etc. shall be regularly maintained to ensure that excessive noise generated any worn or rattling components is minimised;
- Any new or replacement mechanical plant items, including plant located inside new or existing buildings, shall be designed so that all noise emissions from site do not exceed the noise limits outlined in this document.

Chapter 13 sets out that:

*'In general, all wall constructions (i.e. block work or concrete and spandrel elements) offer a high degree of sound insulation, much greater than that offered by the glazing systems. Therefore, noise intrusion via the wall construction will be minimal.'*

The Chapter recommends that certain facades are to be provided with glazing and ventilation that achieves the minimum sound insulation performance (i.e. Block A<sub>1</sub>, A<sub>2</sub> and Block F) which are facades facing either Milltown Road or Sandford Road.

The Chapter further concludes that:

*'The assessment has demonstrated that the recommended internal noise criteria will be achieved through consideration of the proposed façade elements at the design stage. The calculated glazing and ventilation specifications are preliminary and are intended to form the basis for noise mitigation at the detailed design stage. Consequently, these may be subject to change as the project progresses. There is no acoustic requirement relating to the creche façade. Appropriate internal noise levels are predicted to be achieved with standard double glazing and ventilators.'*

Therefore, it is clear that the project has comprehensively considered population and human health in relation to noise and vibration. The potential impacts on human beings in relation to the generation of noise and vibration during the construction phases are that high levels of noise and vibration could cause nuisance to people in nearby sensitive locations. Implementation of the mitigation measures set out and adherence to good practice noise reducing measures will ensure that the short-term, slight to significant, negative impacts on human health will be lessened.

Similarly, during the operational phase, plant selections designed to achieve the relevant noise criteria will result in a residual impact that is long-term, imperceptible and neutral to people in nearby noise sensitive locations. External noise sources have been assessed and mitigation to ensure internal noise levels achieve the relevant noise criteria have been provided.

#### 5.7.8.4 Landscape and Visual Impact

##### *Do Nothing*

The site would remain as a large area of formerly institutional land of parkland character within an urban area of mixed character with no access to the general public. In the current situation, as a component of the local green infrastructure network it provides some visual amenity and ecosystem services. However, in the context of compact growth, the site is considered an unsustainable use of the land resource and the public have never enjoyed any right of access to these privately owned lands.

##### *Construction Phase*

Chapter 9 of this EIAR prepared by Modelworks (Landscape and Visual Impact Assessment) assesses the potential effects of the proposed development on the landscape character and views/visual amenity of the receiving environment. The Chapter notes that potential visual impacts during the construction phase are related to site set up (hoarding, construction

compound etc.), demolition and site clearance, excavation, site services installation, construction of buildings, frames and envelopes, interior fit-out of buildings and external works (landscaping, streetscape, boundary works etc). However, Chapter 9 notes that any moderate and negative effects on the townscape in the immediate vicinity of the site would be temporary, reducing in significance with distance from the site.

### *Operational Phase*

As noted above a Landscape and Visual Impact Assessment is included as Chapter 9 of this EIAR. This assessment notes:

*'The site in its existing condition is a gap/inconsistency in this area – a notable gap owing to its large size, enclosure (due to the high boundary wall and trees), historically private use and position at a key junction. This local dilution of townscape character is noticeable on the approaches to the junction of Clonskeagh Road, Eglinton Road, Milltown Road and Sandford Road.*

*Balancing the area's sensitivities, there are also indications of capacity for change in the townscape, which are given heightened importance by compact growth policy.'*

Furthermore, the Chapter states that:

*'Townscape change of some significance is unavoidable with the development of a large opportunity site, in a prominent position (at a key junction in the urban structure, with long frontage to two main thoroughfares), at the interface between two different character areas (one being characterised by low density development). Contemporary, high density development that fits comfortably into the Milltown Road area will inevitably contrast with the Sandford Road area. Additionally, if the development is intended to mark the junction to improve legibility, it must protrude above the tree line and therefore intrude in views from the lower density area of Sandford Road.*

*Such tensions in the townscape are increasingly common and are not undesirable in the evolving urban environment. There is an established, policy-driven trend of redevelopment of the previously institutional lands in inner suburban areas. The access of these areas to public transport, neighbourhood centres and other urban amenities is too valuable not to exploit. The resulting change should therefore be viewed as neutral in principle, and if it can also deliver benefits additional to density, e.g. improved legibility, place identification or the introduction of buildings of high design and material quality, thereby adding to the character and visual interest of the townscape, its effects can be positive - even if it contrasts with some of the context development. It will not be possible to achieve high density in historically low density areas without such change in townscape character and the composition of views'.*

The LVIA enclosed as EIAR Chapter 9 concludes that significant townscape benefits would be achieved as a result of the proposed development such as place identification, improved legibility and introduction of buildings of high design and material quality. The assessment concludes that the townscape effects are predicted to be positive.

### *Proposed Mitigation Measures*

During construction stage, Chapter 9 notes that apart from measures such as tree and biodiversity protection and standard best practice construction site management (i.e. erection and maintenance of site hoarding, orderly storage of materials and vehicles, etc.), no additional mitigation measures are proposed for townscape and visual effects.

In relation to the operational stage, the Chapter notes the following mitigation measures that have been built into the proposal from the outset:

- *The retention of the tree/ woodland belt inside the north and east boundaries as part of the scheme's main public open space (not all of the trees, but most of the better quality trees – a sufficient volume to retain the tree belt as a key feature of the landscape), with the buildings (Block A and C) set back well behind the trees. This would (a) retain the site's 'parkland' character in views from Sandford Road and Milltown Park, (b) provide screening of the buildings, and (c) lend maturity, identity/ character, landscape and visual amenity to the new neighbourhood.*
- *The retention of Tabor House and the Chapel on the site. The dual intention was to (a) preserve these assets in the interest of cultural/ architectural heritage conservation, and (b) to lend maturity, identity/ character, landscape and visual amenity to the new neighbourhood.*
- *Retention of trees, setting back of the buildings (Block C) and modulation of building height along the north (Norwood Park) boundary. Block C is set back from the boundary behind a linear open space incorporating the retained trees, to function as a landscape/ visual buffer between the building and the nearest houses of Norwood Park. The northern range of Block C is also broken into four distinct volumes, of two, four, six and eight storeys. The intention of this articulated form is to reduce the perception of massing/height in the views from Norwood Park.*
- *Positioning of lower buildings (Block E and the lower volume of Block D) inside the west (Cherryfield Avenue) boundary. The proposed Block E terraces are three storeys and are positioned against the west boundary in a back-to-back arrangement with the Cherryfield Avenue houses. This is a typical lower density suburban arrangement. The Block D apartment building steps down from five to three storeys towards the west boundary, with the same intention of minimising the intrusion of the building in views from Cherryfield Avenue.*
- *High quality design and materials. The proposed scheme is conceived as a higher density neighbourhood of the highest architectural and landscape quality, commensurate with the qualities of the urban context. Therefore, even when visible from the surroundings (as a higher density development in a traditionally low density area unavoidably would be), the buildings and landscape would be attractive. The townscape character and views would change, but their quality would be maintained.*

In addition, the Chapter notes the following in relation to Block A1:

*'In addition to these decisions taken at the start of the design process, an important mitigation measure was the reduction in scale of Block A1. This element of the proposal is deliberately tall in order to achieve place-making and townscape legibility gains.*



*However, at 13 storeys (as originally proposed) the step up in height from the surrounding built form could have been considered excessive and the building excessively intrusive in views. In recognition of this Block A1 was reduced to 10 storeys and set back several meters further from the Sandford Road boundary (the setting back was also to improve the open space inside the north boundary). The result is that the building would be visible and recognisable from the surrounding area (i.e. it would function as a landmark) without dominating or otherwise harming its townscape context.'*

Please see Chapter 9 for full details of these mitigation measures. In relation to population and human health, the Chapters notes that the proposed development would introduce a new, high density residential neighbourhood to the townscape, making more sustainable use of the valuable urban land resource. The proposal includes a substantial area of communal and public open space, most notably a new public park (including a playground and a network of footpaths) inside the site boundaries along Sandford Road and Milltown Road. The park would be visible and accessible from the public realm around the site, representing a significant gain in public open space with long-term, positive and significant impacts on the health of the existing population and the new resident community.

#### 5.7.8.5 Waste Management

##### *Do Nothing*

If the site remains in its current form, there would be no demolition, excavation, construction, or operational waste generated at this site and there would thus be a neutral effect on the environment and human health in terms of waste management.

##### *Construction Phase*

Throughout the construction phase there may be potential for impacts to occur on human health such as incorrect management of waste which could result in littering and could cause a nuisance to the public and attract vermin. Chapter 14 of this EIAR (Material Assets – Waste Management) sets out that a carefully planned approach to waste management and adherence to the project specific Construction and Demolition Waste Management Plan (C&DWMP – Appendix 14.1) will ensure appropriate management of waste and avoid any negative impacts on the local population.

##### *Operational Phase*

Throughout the operational phase there may be potential for impacts to occur on human health such as incorrect management of waste which could result in littering and could cause a nuisance to the public and attract vermin. Chapter 14 of this EIAR (Material Assets – Waste Management) sets out that a carefully planned approach to waste management and adherence to the Operational Waste Management Plan (OWMP – Appendix 14.2) will ensure appropriate management of waste and avoid any negative impacts on the local population.

##### *Proposed Mitigation Measures*

As noted above, the Material Assets – Waste Management Chapter of the EIAR has set out mitigation measures for the proposed development such as the implementation of the C&D

WMP and the OWMP which will ensure that the effects on population and human health are long-term, imperceptible and neutral.

Correct classification and segregation of the excavated material during construction is required to ensure that any potentially contaminated materials are identified and handled in a way that will not impact negatively on workers as well as on water and soil environments, both on and off-site.

In addition, the following mitigation measures will be implemented during construction:

- Building materials will be chosen with an aim to 'design out waste';
- On-site segregation of waste materials will be carried out to increase opportunities for off-site reuse, recycling and recovery – it is anticipated that the following waste types, at a minimum, will be segregated:
  - Concrete rubble (including ceramics, tiles and bricks);
  - Plasterboard;
  - Metals;
  - Glass; and
  - Timber.
- Left over materials (e.g. timber off-cuts, broken concrete blocks/bricks) and any suitable construction materials shall be re-used on-site, where possible;
- All waste materials will be stored in skips or other suitable receptacles in designated areas of the site;
- Any hazardous wastes generated (such as chemicals, solvents, glues, fuels, oils) will also be segregated and will be stored in appropriate receptacles (in suitably bunded areas, where required);
- A waste manager will be appointed by the main contractor(s) to ensure effective management of waste during the excavation and construction works;
- All construction staff will be provided with training regarding the waste management procedures;
- All waste leaving site will be reused, recycled or recovered where possible to avoid material designated for disposal;
- All waste leaving the site will be transported by suitable permitted contractors and taken to suitably registered, permitted or licenced facilities; and
- All waste leaving the site will be recorded and copies of relevant documentation maintained.

Nearby sites requiring clean fill material will be contacted to investigate reuse opportunities for clean and inert material, if required. If any of the material is to be reused on another site as by-product (and not as a waste), this will be done in accordance with Article 27 of the EC

(Waste Directive) Regulations (2011). EPA approval will be obtained prior to moving material as a by-product.

These mitigation measures will ensure that the waste arising from the construction phase of the development is dealt with in compliance with the provisions of the Waste Management Act 1996, as amended, associated Regulations and the Litter Pollution Act 1997, the EMR Waste Management Plan (2015-2021). It will also ensure optimum levels of waste reduction, reuse, recycling and recovery are achieved and will encourage sustainable consumption of resources.

During operation, the following mitigation measures will be implemented:

- On-site segregation of all waste materials into appropriate categories including (but not limited to):
  - Organic waste;
  - Dry Mixed Recyclables;
  - Mixed Non-Recyclable Waste;
  - Glass;
  - Waste electrical and electronic equipment (WEEE);
  - Batteries (non-hazardous and hazardous);
  - Cooking oil;
  - Light bulbs;
  - Cleaning chemicals (pesticides, paints, adhesives, resins, detergents, etc.);
  - Furniture (and from time to time other bulky waste); and
  - Abandoned bicycles.
- All waste materials will be stored in colour coded bins or other suitable receptacles in designated, easily accessible locations. Bins will be clearly identified with the approved waste type to ensure there is no cross contamination of waste materials;
- All waste collected from the development will be reused, recycled or recovered where possible, with the exception of those waste streams where appropriate facilities are currently not available; and
- All waste leaving the site will be transported by suitable permitted contractors and taken to suitably registered, permitted or licensed facilities.

These mitigation measures will ensure the waste arising from the development is dealt with in compliance with the provisions of the Waste Management Act 1996, as amended, associated Regulations, the Litter Pollution Act 1997, the EMR Waste Management Plan (2015 - 2021) and the DCC waste bye-laws. It will also ensure optimum levels of waste reduction, reuse, recycling and recovery are achieved.

#### 5.7.8.6 Biodiversity

##### *Do Nothing*

If the proposed works were not to go ahead, it is likely that the park area with grassland, treelines and woodland would be retained and possibly left in a less intensely managed regime, e.g. the current situation indicate that the grass is not cut on a regular basis. The

naturalisation of the grassland has the potential to increase floral species diversity. There will be no loss of habitat.

The invasive non-native species in the woodland has the potential to outcompete the native flora in the groundcover of the woodland if the appropriate management is not incorporated.

### *Construction Phase*

The development will require removal of vegetation within the site. This will reduce the extent of a range of habitats, including mixed broadleaved, conifer woodland, treelines, scrub and grassland. This also has the potential to impact on Dodder Valley pNHA by resulting in reduced connectivity when greenspace is decreasing in the urban area. The removal of vegetation could also affect wildlife, such as terrestrial mammals, bats and birds by direct mortality, loss of potential roosting, nesting, commuting and foraging habitat. Implementation of mitigation measures during the construction phase includes protection of retained vegetation and planting of native shrubs, trees and wildflowers within the site. The planting of native shrubs as groundcover in the woodland will provide habitat for mammals and breeding birds and strengthen the boundary woodlands function as a green infrastructure corridor, securing the connectivity with Dodder Valley pNHA.

Measures in place to protect mammals, including Badger, Hedgehog and Pygmy Shrew during construction include clearing away of material not in use, covering of pipes to prevent animals getting trapped and removal of vegetation on a rotational basis to provide cover. Removal of vegetation will take place outside of the bird nesting season.

There will be a loss of potential bat roost habitats due to removal of tree with Tag No. 311 and the demolition of existing building (Milltown Park House). These will be re-inspected prior to removal/demolition by a qualified ecologist. If they are deemed to be providing bat roosts a derogation licence is required to proceed with the works. Soft felling technique will be applied when felling the tree and bats will be excluded from the building before demolition can take place. Bat boxes will be installed on trees within the woodland and thus mitigate for these potential losses.

The site has surface water connectivity with River Dodder and its aquatic receptors (fish) and with Dublin Bay and the following pNHAs: Booterstown Marsh, The Dolphins, Dublin Docks and Dalkey Coastal Zone and Killiney Hill. However, impact on surface water features will be negligible to neutral. Any suspended solids will naturally settle within the drainage pipes and hydrocarbons will dilute to background levels (water quality objectives as outlined in S.I. No. 272 of 2009 and S.I. No. 77 of 2019 amendment); by the time the stormwater reaches any open water based on the distance to waterways.

Artificial lighting during construction has the potential to cause disturbance to bats and reduce quality of foraging and commuting habitat. Works will be restricted to daytime hours, however there might be a need for out-of-hours work in some circumstances and thus require lighting. Lighting used will be LED luminaires in warm white spectrum (2700 K – 3000 K) to reduce the blue light composition.

Wintering birds have not been identified to use the site and the site is assessed unsuitable as feeding habitat for wintering birds. Any impact is likely to be negligible.

The residual impact during the construction phase is assessed to be of negligible impact.

### *Operational Phase*

Lighting of vegetation and reduction of vegetation within the site could impact on the quality of habitats, such as mixed broadleaved, conifer woodland, treelines, scrub and grassland, making the site less suitable for bats and terrestrial mammals. Measures are in place to compensate for the loss of habitats, including enhancing the cover of scrub in the woodland with native species and planting of native tree species within the site which will ensure the sites functions to provide habitat potential for a range of species of mammals such as Badger, Hedgehog and Pygmy Shrew, birds and insects, and provide a wildlife corridor securing connectivity to River Dodder, Dodder Valley pNHA and other open green space in the urban area.

Bat friendly lighting will be implemented and foraging habitat will be provided, including planting of wildflowers and apple trees. Green roofs planted with suitable species that support invertebrates can offer additional foraging habitat for bats. This will ensure that key bat habitats are maintained at a good quality and will minimise any potential negative impact on this species group.

The site was not identified as providing habitat for wintering birds and it is not within any know flight line of sensitive bird species. Therefore, the buildings are not likely to cause collision. The impact on wintering birds is likely to be neutral.

Emission from traffic during operation will not have a significant impact on air quality and will not impact on habitats within the site.

The residual impact during the operation phase is assessed to be of negligible impact.

### *Proposed Mitigation Measures*

Chapter 8 of this EIAR sets out mitigation measures to be implemented as part of the proposed development in relation to bats, terrestrial mammals, habitats and birds. The proposed mitigation measures for the construction stage have been summarised below:

- The woodland on the proposed development site will be planted with native shrubs as groundcover and native tree species will be incorporated into the planting regime. This will secure the sites function as a connecting wildlife corridor with River Dodder and the Dodder Valley pNHA;
- During removal of vegetation and construction works, trees to be retained will be protected by the erection of protective fencing under supervision of Site Arborist prior to construction and no works are to be undertaken within the tree root protection zone, as specified in the Arborist Report (CMK Horticulture & Arboriculture Ltd, 2021). The Site Arborist shall monitor the tree protection during construction. Further, the regeneration of young trees needs to be safe guarded and young/early mature trees of high quality will be retained;
- Planting of new vegetation will take place during construction in tandem with the construction of buildings. To compensate for the removal of 283 trees there will be 238 new large multi-stem trees and large shrubs planted across the site. Native



species of scrub will be planted in the mixed broadleaved/conifer woodland and have been specifically selected to provide nesting habitat for birds and safe cover for mammals. This will enhance the field layer in the woodland as it is currently dominated by non-native species;

- The proposed tree planting includes native and non-native (ornamental) species. The native species have been chosen primarily based on species currently present on the site. Native tree species to be planted include: Holly, Wild Cherry, Downy Birch *Betula pubescens*, Pedunculate Oak *Quercus robur*, Rowan *Sorbus aucuparia* and Hazel;
- There are six elm trees present on site (five English Elm *Ulmus Procera* and one Wych Elm *Ulmus glabra*). One English Elm (Arborist Tag No. 220) and the Wych Elm (Arborist Tag No. 214) will be retained on the site. Elms have a limited long-term potential due to Dutch Elm disease. Therefore, the Elms to be removed will be replaced with tree species with better long-term prospects;
- The grassland west of Tabor House, which at present is used for foraging by bats, will be planted with wildflower meadow from native wildflower seed mix and an orchard (*Malus* spp.) which will provide valuable resource for pollinators and thus continue to provide foraging resource for bats. Insect hotels will be installed in this area and in the green space east of the northern entrance of the site which has a mix of heritage lawn and wildflower planting. The insect hotels will be placed in a sunny location facing south, south-east. These will provide nesting habitat for solitary bees. Planting of new vegetation will take place during construction in tandem with the construction of buildings. Planting of native scrub will enhance the woodland habitat and strengthen it as a connecting habitat for wildlife in the wider area. The incorporation of native tree species in the planting scheme will further provide for green connecting corridors within the site;
- Green roofs are proposed on the new buildings (refer to Landscape Masterplan) which will compensate for the loss of grassland habitat and enhance biodiversity of the developed site and further connecting the green corridors within the site. Native species (e.g. those associated with native dry grasslands) will be planted on the roofs. Suitably planted green roofs can also provide important foraging habitats for birds and bats;
- The hours of working will be limited to daylight hours where possible, to limit disturbance to nocturnal and crepuscular animals;
- Contractors must ensure that no harm comes to wildlife by maintaining the site efficiently and clearing away materials which are not in use, such as wire or bags in which animals can become entangled;
- Any pipes should be capped when not in use (especially at night) to prevent animals becoming trapped. Any excavations should be covered overnight to prevent animals from falling and getting trapped. If that is not possible, a strategically placed plank should be placed to allow animals to escape;
- During vegetation removal, caution is needed in case of nesting Hedgehogs within the woodland. The site will be visually checked by an Ecological Clerk of Works

(ECoW) prior to bringing in any machinery and be cleared on a rotational basis with scrubby patches left to provide nesting habitat and cover for Hedgehog. In addition, piles of dead wood and brash piles shall be created in undisturbed areas of the site during construction;

- The woodland in the north and east part of the site will be retained and enhanced by planting of groundcover with native scrub thus securing habitat for mammals habiting the site. There will be removal of low quality trees and scrub. However, high quality trees (mature and young) and Ivy will be retained. Planting of native species of trees and scrub will strengthen the woodland as a connecting habitat and will compensate for loss of foraging and commuting habitat;
- Lighting will be switched off during non-working hours where possible and directional lighting will be used during the construction phase. This will minimise spill to any other area forming part of the bats commute. The specification and colour temperature of light treatments is chosen based on their tolerability by bats. LED luminaires are ideal due to their sharp cut-off, lower intensity, and dimming capability. A warm white spectrum (2700 K – 3000 K) will be used to reduce the blue light component;
- Three trees on site were identified to have bat roost potential. One of these trees (Arboricultural Tag Number 311) is destined for removal. The following tree felling procedure will be adhered to when felling trees identified as suitable to provide potential bat roosts: All bats, and any trees that are identified as bat roosts, are legally protected by the Wildlife Acts and the EU Habitats Directive;
- The tree with Arboricultural Tag Number 311, which is destined for removal, will be re-examined by an experienced bat specialist before tree felling starts. The examination will be carried out at height under derogation licence using torch and/or endoscope. If features are confirmed as not being suitable for use as roosts, then work can continue. If bats/evidence of bats/or suspected roosts are found, then these will be legally protected, and an application for a derogation licence will be made before moving forward with the works with appropriate mitigation in place, involving soft felling, lowering sections to the ground and then leaving in place overnight (to allow any bats to make their way out);
- A pre-construction bat survey of the roof space of Milltown Park House will be conducted prior to any demolition works in case conditions change over the timeframe of the planning application until construction starts. The survey will be conducted by a suitably qualified and licensed bat ecologist. If bats are present, demolition will have to be postponed and a derogation licence will be required before carrying out any works. Prior to works commencing, bats must have safely left the roost which can be done by an exclusion procedure involving installation of one-way valves over access points for bats following instructions from a bat ecologist. The majority of roosts are only used seasonally and demolition works should be adapted to this;
- Three bat boxes will be installed on mature trees present within the woodland. The following trees have been identified as suitable, referring to Arboricultural Tag Number: 297, 352 and 324. These trees are selected due to being mature and in suitable location for bat boxes. Before the bat boxes are installed, Ivy will be removed

from the area surrounding the placement of each Bat box (1m radius). Large multi-chambered bat boxes will be used (e.g. <https://www.nhbs.com/large-multi-chamber-woodstone-bat-box> or similar) as they are likely to benefit species identified on site, including Common Pipistrelle *Pipistrellus pipistrellus*, Soprano Pipistrelle *Pipistrellus pygmaeus*, Leisler's Bat *Nyctalus leisleri* and potentially some Myotis Bat species;

- Any clearance of trees and scrub will be conducted outside of the bird nesting season (March to September inclusive);
- Demolition or reroofing of buildings must take place outside of the bird nesting season (March to September included) as Jackdaw and Herring Gull are nesting in the chimneys. If works are to take place in 2022, or years thereafter, it should take place outside of the bird nesting season or the chimneys should be bird proofed by a specialist contractor prior to nest building/egg laying and a new breeding bird survey by a qualified ecologist should take place before any demolition works start;
- Some 4 No. bird boxes will be installed in the woodland along the eastern boundary. Trees identified to install the bird boxes on have the Arboricultural Tag Numbers 11, 175, 191 and 269;
- Planting of native species of trees and scrub will compensate for loss of foraging, commuting and nesting habitat. The planting of native shrubs in the ground layer of woodland will provide cover and nesting opportunities for birds and the mixed planting of wildflowers, heritage lawn, fruit trees and green roofs will attract insects which is a food resource for many bird species.

The proposed mitigation measures for the operation stage have been summarised below, which is particularly relevant in terms of population and human health:

- A dark corridor will be maintained around the boundary of the site to provide commuting and foraging habitat for bats (Figure 8.21). The key bat habitats include the woodland surrounding the site in the north and east which was identified as bat commuting habitat during the activity surveys and it connects the site to adjacent gardens and potential commuting routes outside of the site. The second key bat habitat which is located to the west of Tabor House was identified as an important foraging area for bats during the activity surveys. This area will be planted with a wildflower meadow and fruit trees to attract insects and provide foraging opportunities for bats. The Holly treeline in the centre of the site was also identified as a commuting route for bats, however this will be removed as part of the new development. The key bat habitats including the woodland along the north and eastern boundary will not be lit by artificial lighting and the key bat foraging area of wildflower meadow west of Tabor house will have restricted lighting with light turned off at curfew time 22:30 during the summer months May to September inclusive. The open public space will act as supporting habitat providing a buffer zone around the key habitat and connecting the woodland with the wildflower meadow. The lighting in the buffer zone will be restricted. The dark corridor will maintain the sites connectivity with the surrounding area, providing connectivity with the wider urban landscape;

- Mitigation measures include limiting hours of illumination, restricting light levels and type of lighting and incorporating restricted column heights of lamp posts and direction of light;
- Although it is deemed unlikely that light emitted from buildings will significantly impact on potential foraging and commuting areas for bats as these will largely lie along the extremities of the Site, particularly along the north and eastern site boundary; night-time light spill from the interiors of the proposed buildings via windows/entrances; and the levels of spill/glare from outdoor lighting in place on the building exterior and throughout the site; will be minimised through selective lighting measures (such as fittings set back into the room) utilised for units facing towards the buffer zone;
- The grassland to the western side of The Chapel and Tabor House was frequently used by foraging bats during the surveys. This area will be planted with wildflower meadow from native wildflower seed mix and an orchard (*Malus* spp.) which will provide valuable resource for pollinators and thus continue to provide foraging resource for bats. Green roofs planted with suitable species that support invertebrates can offer additional foraging habitat for bats. The restricted lighting in the buffer zone (supporting habitat) will ensure that bats can commute between the woodland and foraging area west of The Chapel and Tabor House;
- As noted previously, bat boxes will be installed on 3 No. mature trees.

The residual impact during the construction and operation phase of the development is assessed to be of negligible impact.

Chapter 8 further notes that there will be an interaction between biodiversity and population and human health as there will be provision of lighting to provide a safe outdoor realm for residents which, without mitigation, could impact on nocturnal species, such as bats. Mitigation measures include the provision of a dark corridor with restricted lighting and a lighting design minimising impact on bats and other nocturnal animal, providing suitable commuting and foraging habitat.

The retained open space within the site will provide amenity areas for residents, including play areas, fitness areas and benches. This will involve thinning of trees within the woodland which, without mitigation, could impact on wildlife in the area for which the woodland provides cover and foraging ground. Mitigation measures involve planting of native shrubs in the understory which will enhance the woodland structure and planting of 238 new trees across the site. These measures will provide habitat for wildlife to safely commute and nesting opportunity for birds.

With the implementation of the outlined mitigation measures, the interaction between population/human health and biodiversity will be long-term, not significant and neutral.

#### 5.7.8.7 Microclimate - Wind

##### *Do Nothing*

If the proposed development does not go ahead, based on the assessment carried out on the existing site and the statistical analysis of 30 years of climate data from the nearby Dublin

airport (Met Eireann), the existing site will remain well sheltered from the prevailing wind directions and will continue to be considered a comfortable environment for pedestrians.

### *Construction Phase*

The assessment of the wind microclimate during the construction phase has been based on professional judgement by reviewing the existing site conditions and the expected conditions once the development is in place via the Computational Fluid Dynamics modelling.

It is expected the wind microclimate will gradually adjust from the existing conditions to the final modelled scenario as construction progress develops. However, the mitigation measures outlined in the following sections will need to be implemented before completion to ensure comfortable conditions once the proposed development becomes operational.

### *Operational Phase*

Chapter 17 outlines specific mitigation measures that have been incorporated into the proposed design to prevent excessive wind speeds during the operational phase of the development. The proposed development has been designed to have acceptable pedestrian wind comfort conditions during the operational phase.

The trees and planting associated with the landscape design will continue to grow and develop after the proposed mitigation measures have been implemented, thus providing increased protection from the wind resulting in increased pedestrian comfort conditions in these areas which will be a positive impact.

### *Proposed Mitigation Measures*

The following mitigation measures have been incorporated for the operational stage:

#### Apartment Block Arrangement

The arrangement of the apartment blocks has been carefully chosen to help mitigate increased wind speeds throughout the site. The central areas within the development are well protected from the predominant south-west wind direction via the buildings located to the south-west. Furthermore, an internal courtyard space has been incorporated within Block B and C which provides a sheltered area for pedestrians to utilise throughout the year.

#### Rooftop Amenity Canopy

A canopy has been integrated into the design of the building above the rooftop amenity space in Block A1. The canopy protects the amenity space from building downwash, deflecting the wind away and creating a comfortable environment for the occupants using the amenity space.

#### Inset Balconies

The Block A1 tower which is most exposed to the wind due to its height, predominantly incorporates inset balconies. Inset balconies offer increased wind protection for people utilising the balcony spaces as they provide a natural shelter from the elements.



### Solid Balustrades

All private balconies on the tower element of Block A1 (floors 5 to 9) and the shared rooftop amenity areas will incorporate solid glazed balustrades. Full length solid balustrades block wind directly entering the balcony space, dissipating the wind speed within the balcony area which creates a much more comfortable experience for occupants.

### Landscaping

The landscaping has been strategically designed to mitigate increased wind speeds and to provide shelter for pedestrians at ground level, within the central courtyard spaces and on the rooftop amenity areas. The landscaping design incorporates trees, hedges and raised planters and sheltered seating pockets which all act as wind mitigation measures.

Trees are to be planted close to primary entrance ways and along the streetscape, mitigating excessive wind speeds and providing shelter for pedestrians at street level. The use of trees and low-level shrubs all assist in the localised reduction of wind speed.

Chapter 18 sets out that the modelling has included the proposed design, the proposed landscaping strategy and the existing landscape which will remain, in conjunction with the existing buildings surrounding the development. The combination of all interactions has resulted in a comfortable environment for pedestrians within the proposed development.

## **5.8 Potential Cumulative Impacts**

The potential impacts that may arise from the proposed development on population and human health have been considered cumulatively across this EIAR with other developments in the area, in terms of noise, traffic, air quality, landscape and visual impact etc. A full list of permitted and pending developments reviewed by all EIAR Consultants is included in Chapter 3.0. As a result of the proposed development, some 671 No. units will be provided comprising a mix of Build-to-Rent and Build-to-Sell unit types, along with associated ancillary amenities and facilities and a creche.

The cumulative impact of the proposed development at the subject lands will be positive in the long term in relation to population and human health as the introduction of a new neighbourhood provides opportunities for a wide cohort of persons to rent or purchase a home within an existing residential area and the provision of a creche can benefit the wider community, in addition to the significant quantum of public open space provided.

In addition, we note that the public have never enjoyed any right of access to these privately owned lands. The proposed development will open up the site and a significant quantum of public open space will be provided, and permeable links have been incorporated through the site through the new public park, the pedestrian boulevard, new pedestrian entrances and the facilitation of future potential links to the remaining institutional lands to the south-east.

The extensive public open space and permeable links will enhance the accessibility and permeability of the area for the existing population and promote cycle and walking, ultimately resulting a positive impact on population and human health.

## 5.9 Interactions

The potential impacts on human health have been comprehensively considered throughout the preparation of this EIAR. Interactions occur with air quality and climate, water-hydrology, noise and vibration, biodiversity, landscape and visual impact, material assets-waste management, material assets-transportation and microclimate-wind.

### 5.9.1 Interactions between Population/Human Health and Air Quality/Climate

The main interactions are predicated to arise during construction stage as there will be dust emissions associated with the construction of the proposed development. Mitigation measures such as the implementation of a Dust Management Plan (outlined in Appendix 12.2) will minimise dust emissions during construction stage and ensure that no adverse impacts will occur on population and human health. The mitigation measures that will be put in place at the proposed development will ensure that the impact of the proposed development complies with all ambient air quality legislative limits and therefore the predicted impact is short-term, imperceptible and neutral with respect to population and human health during construction and long-term, imperceptible and neutral during operation phase.

### 5.9.2 Interactions between Population/Human Health and Transportation

The scheme will be developed in line with the Transportation Chapter (Chapter 15 of this EIAR) and the separately enclosed Preliminary Construction Management Plan (PCMP) to ensure any impacts on local traffic is minimised during the construction stage. Chapter 15 notes that a large proportion of the construction employees are anticipated to arrive in shared transport therefore reducing the potential for associated temporary negative impacts on the surrounding road network. Appropriate on-site parking and compounding will be provided on this large site to prevent overflow onto the local network. Deliveries will be actively controlled and subsequently arrive at a dispersed rate during the course of the working day. Provided that mitigation measures and management procedures detailed in Chapter 15 are implemented, the residual impact on the local receiving environment during the construction stage will be short-term, imperceptible and neutral.

As the development proposes some 671 No. residential units and associated (albeit) reduced car-parking, there will be additional traffic movements at the site and in the vicinity. The implementation of mitigation measures such as the implementation of the Mobility Management Plan will ensure that the residual effect on the local receiving environment is both managed and minimised. The promotion of sustainable modes of transport from the site, the large quantum of bicycle parking provided and the incorporation of permeable links through the site will contribute towards modal shift in travel patterns and increased physical activity, which will have a positive, significant and long-term effect on the area.

If the development does not proceed at the subject lands, there would be a potential negative impact for pedestrians and cyclists in the local area as the significantly enhanced pedestrian and cyclist permeability through the site would not be provided to shorten journeys to public transport, services and facilities.

### **5.9.3 Interactions between Air Quality and Climate, Transportation and Population/Human Health**

Chapters 12 and 15 outline interactions between air quality and traffic/transportation respectively. Interactions between air quality and traffic can be significant. With increased traffic movements and reduced engine efficiency, i.e. due to congestion, the emissions of vehicles increase. The impacts of the proposed development on air quality are assessed by reviewing the change in annual average daily traffic on roads close to the site. Chapter 12 concludes that the impact of the interaction between traffic and air quality is considered to be long-term, imperceptible and neutral. The interaction between air quality/climate and transportation with population and human health is not expected to generate any significant impacts.

### **5.9.4 Interactions between Population/Human Health and Noise/Vibration**

The potential impacts on human beings in relation to the generation of noise and vibration during the construction phases are that high levels of noise and vibration could cause nuisance to people in nearby sensitive locations. Best practice noise and vibration control measures will be employed by the contractor during the construction phase in order to avoid significant impacts at the nearest sensitive buildings. Implementation of the mitigation measures set out and adherence to good practice noise reducing measures will ensure that the short-term, slight to significant, negative impacts on human health will be lessened.

Similarly, during the operational phase, plant selections designed to achieve the relevant noise criteria will result in a residual impact that is long-term, imperceptible and neutral to people in nearby noise sensitive locations. External noise sources have been assessed and mitigation to ensure internal noise levels achieve the relevant noise criteria have been provided.

### **5.9.5 Interactions between Population/Human Health, Landscape and Wind**

Chapter 9 provides a Landscape and Visual Impact Assessment prepared by Modelworks. The Chapter sets out that the proposed development would introduce a new, higher density residential neighbourhood to the townscape, making more sustainable use of the valuable urban land resource. The proposal includes a substantial area of communal and public open space, most notably a new public park (including a playground and a network of footpaths) inside the site boundaries along Sandford Road and Milltown Road. The park would be visible and accessible from the public realm around the site, representing a significant gain in public open space with long-term, positive and significant impacts on the health of the existing population and the new resident community.

The interactions between the proposed development and its environs and human health have been evaluated within the Wind Assessment. The modelling has included the proposed design, the proposed landscaping strategy and the existing landscape which will remain, in conjunction with the existing buildings surrounding the development. The combination of all interactions has resulted in a comfortable environment for pedestrians within the proposed development, and the interaction between population/human health, landscape and wind will be long-term, neutral and imperceptible.

### **5.9.6 Interactions between Population/Human Health and Waste Management**

As set out in Chapter 14, the potential impacts on human beings in relation to the generation of waste during the demolition, construction and operational phases are the incorrect management of waste. This could result in littering which could cause a nuisance to the public and attract vermin. A carefully planned approach to waste management and adherence to the project specific Construction and Demolition Waste Management Plan and Operational Waste Management Plan, will ensure appropriate management of waste and avoid any negative impacts on the local population, and thus the interactions between population/human health and waste management will be long-term, imperceptible and neutral.

### **5.9.7 Interactions between Population/Human Health and Biodiversity**

As set out in Chapter 8 (Biodiversity), the open space within the site will provide amenity areas, including play areas, fitness areas and benches. This will involve thinning of trees within the woodland which, without mitigation to protect the wildlife, could impact on wildlife in the area for which the woodland provides cover and foraging ground. Mitigation measures involve planting of native shrubs in the understory which will enhance the woodland structure and planting of 238 No. new trees/large shrubs across the site. These measures will provide habitat for wildlife to safely commute and nesting opportunity for birds.

Interaction with population and human health involves the provision of lighting to provide a safe outdoor realm for residents which, without mitigation, could impact on nocturnal species, such as bats. Mitigation measures include the provision of a dark corridor with restricted lighting and a lighting design minimising impact on bats and other nocturnal animal, providing suitable commuting and foraging habitat. With the implementation of the outlined mitigation measures, the interaction between population/human health and biodiversity will be long-term, not significant and neutral.

### **5.9.8 Interactions between Population/Human Health and Water-Hydrology**

Potential impacts on human health have been considered in the Water-Hydrology chapter (Chapter 11). The Chapter sets out that the implementation of the measures outlined within the Chapter will ensure that the potential impacts do not occur on water and hydrology and ultimately there is anticipated to be no impact on population and human health in this regard.

As set out in Chapter 11, surface water drainage has been carried out in accordance with Greater Dublin Strategic Drainage Study (GDSDS) and SuDS methodologies will be implemented, therefore no predicted impacts on water and hydrology will arise during the operational stage. Therefore, the interaction between population/human health and water-hydrology are considered to be long-term, imperceptible and neutral.

### **5.10 Difficulties Encountered**

There were no significant difficulties encountered in the preparation of this Chapter. However, we note some references to 2019 or early 2020 data were utilised in the Chapter as the Covid-19 pandemic has had an impact on the economy and employment figures.

However, we consider it important to assess the positive trends that were emerging before the pandemic impacted the country.

### 5.11 Conclusion

The Chapter has considered any likely impacts that the proposed development may have on population and human health. The baseline scenario is set out which provides details on the current situation in the Rathmines East B Electoral Division. The Chapter discussed potential impacts on population profile and trends, housing, employment/economy, local services and amenities, health and safety, traffic/commuter patterns, in addition to potential impacts on human health (environmental) with reference to other relevant EIAR Chapters including water and hydrology, air quality and climate, noise and vibration, landscape and visual impact, waste management, biodiversity and microclimate – wind. The Chapter also discusses relevant interactions with the other EIAR Chapters, in addition to a range of mitigation measures to ensure any potential impacts on population and human health are lessened during construction and operation stages. The most significant benefit of the proposed development for the surrounding population is the provision of a large quantum of public open space which is significant planning gain for the area.

### 5.12 References

- *Guidelines on the Information to be Contained in Environmental Impact Statements (Environmental Protection Agency (EPA), draft August 2017);*
- *Advice Notes for Preparing Environmental Impact Statements (EPA, draft September 2015);*
- *Advice Notes on Current Practice in the Preparation of Environmental Impact Statements (EPA, 2003);*
- *Guidelines on the Information to be Contained in Environmental Impact Statements (EPA, 2002);*
- *IEMA's Health in Environmental Impact Assessment - <https://www.iema.net/assets/newbuild/documents/IEMA%20Primer%20on%20Health%20in%20UK%20EIA%20Doc%20V11.pdf>;*
- *Environmental Impact Assessment of Projects – Guidance on the preparation of the Environmental Impact Assessment (Directive 2011/92/EU as amended by 2014/52/EU) (European Union, 2017);*
- *Dublin City Development Plan 2016 – 2022 ([www.dublincity.ie/dublin-city-development-plan-2016-2022](http://www.dublincity.ie/dublin-city-development-plan-2016-2022));*
- Central Statistics Office (CSO) Census Data 2016 & 2011 ([www.cso.ie/en/](http://www.cso.ie/en/));
- CSO Live Register ([www.cso.ie/en/statistics/labourmarket/liveregister/](http://www.cso.ie/en/statistics/labourmarket/liveregister/));
- Dublin Housing Observatory (<https://airomaps.geohive.ie/dho/>);



- *Rebuilding Ireland - Action Plan for Housing and Homelessness, 2016* ([www.rebuildingireland.ie](http://www.rebuildingireland.ie));
- *Design Manual for Urban Roads and Streets* (<https://www.gov.ie/en/publication/3360b1-design-manual-for-urban-roads-and-streets/>);
- Met Eireann (<https://www.met.ie/climate/available-data/historical-data>);
- Dublin Bus ([www.dublinbus.ie](http://www.dublinbus.ie));
- Bus Connects ([www.busconnects.ie](http://www.busconnects.ie));
- Go Ahead Ireland ([www.goaheadireland.ie](http://www.goaheadireland.ie)); and
- Google Maps ([www.google.com/maps](http://www.google.com/maps)).

## 6.0 ARCHAEOLOGY AND CULTURAL HERITAGE

### 6.1 Introduction

This Cultural Heritage and Archaeology study undertaken at Milltown Park, Sandford Road, Dublin 6 (Appendix 6. 6.1, Figure 6.1) was prepared by Archer Heritage Planning Ltd on behalf of Sandford Road Living in February 2021. The objective of the study was to identify and record the location, nature and dimensions of archaeological or cultural heritage features, fabric or artefacts that may be impacted by proposed development, gauge the level of impact and include recommendations for potential mitigations necessary.

The study included an examination of existing documentary sources, which was completed in tandem with non-intrusive walkover, geophysical survey and licensed archaeological test trench assessment.

The study was undertaken by Aidan O'Connell BA MIAI, Senior Archaeologist with Archer Heritage Planning Ltd, who has 20 No. years experience in archaeological and cultural heritage impact assessments. He has been eligible to conduct licensed archaeological excavations (under Section 26 of the National Monuments Act 1930 (as amended) since 2002.

### 6.2 Methodology

The Cultural Heritage and Archaeology study included a desk-based study where relevant databases and sources were consulted to determine the archaeological potential of the general area. These sources included:

- Record of Monuments and Places (RMP)/ Sites and Monuments Record. The Record of Monuments and Places (RMP) is a statutory inventory of archaeological sites protected under the National Monuments Acts 1930-2004 (Section 12, 1994 Act), compiled and maintained by the Archaeological Survey of Ireland (ASI). The inventory concentrates on pre-1700 AD sites and is based on a previous inventory known as the Sites and Monuments Record (SMR) which does not have legal protection or status (see [www.archaeology.ie](http://www.archaeology.ie)).
- Topographical Files of the National Museum of Ireland. The National Museum of Ireland Topographical Files is the national archive of all known antiquities recorded by the National Museum listed by county and townland/ street. These files relate primarily to artefacts but also include references to monuments and contain a unique archive of records of previous archaeological excavations.
- Aerial photography.
- Historical maps.
- Documentary research.
- Relevant on-line databases (e.g. Excavation Bulletin; NRA Archaeological Database; Dublin County Archaeology Project).

The desk-based study was supported by several field-based surveys that investigated the potential of the site to contain unrecorded archaeological material. These surveys included:

- Visual inspection of the site was undertaken on 29th July 2019. This involved a systematic, non-intrusive walkover survey. This survey assessed current land-use patterns, site topography, site access and the presence of any previously unrecorded sites of archaeological and cultural heritage interest.

- Archaeological geophysical survey was undertaken in November 2019. The magnetic gradiometer survey was undertaken to identify sub-surface magnetic anomalies indicative of buried areas of archaeological potential. This was undertaken by Dr. R. O'Hara under licence (19R0212) from the Department of Housing Local Government and Heritage (DHLGH) in consultation with the National Museum of Ireland (NMI) (O'Hara 2019).
- Archaeological test excavation was undertaken at the site in December 2019 under licence 19E0709 from the DHLGH in consultation with the NMI (O'Connell 2019). The aim of the test trenching was to test geophysical anomalies and the general archaeological potential of the site.

### 6.3 Guidance and Legislation

Archaeological and cultural heritage protection in Ireland is provided by several international and national mechanisms. These include but are not limited to:

- National Monuments Acts 1930-2014;
- Architectural Heritage & Historic Properties Act. 1999;
- Planning & Development Act. 2000 (as amended);
- The Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act, 1999;
- European Convention on the Protection of the Archaeological Heritage. 1992.
- Environmental Protection Agency (EPA) (2017), Guidelines on the information to be contained in Environmental Impact Statements;
- European Commission 2017 Environmental Impact Assessment of Projects Guidance on the preparation of the Environmental Impact Assessment Report (Directive 2011/92/EU as amended by 2014/52/EU)
- European Union (Planning and Development)(Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018)
- The Dublin City Development Plan 2016-2022
- The Dublin City Heritage Plan

The Framework and Principles for the Protection of the Archaeological Heritage (Department of the Arts, Heritage, Gaeltacht and the Islands, 1999) publication outlines the State's general principles in relation to the management and protection of archaeological heritage. It states that avoidance of developmental impacts on archaeological heritage and preservation in situ of archaeological sites and monuments is always the preferred option. When a site, or part of a site, must be removed due to development, then preservation by record must be undertaken (i.e. through licensed excavation and recording). The Dublin City Development Plan 2016-2022 (Section 11.1) sets out general policies and standards for development within the city. The current plan contains lists of cultural heritage sites, including national monuments, recorded monuments and protected structures within the city. It is the Policy of Dublin City Council:

CHC9: To protect and preserve National Monuments.

1. To protect archaeological material in situ by ensuring that only minimal impact on archaeological layers is allowed, by way of the re-use of buildings, light buildings, foundation design or the omission of basements in the Zones of Archaeological Interest.

2. That where preservation in situ is not feasible, sites of archaeological interest shall be subject to 'preservation by record' according to best practice in advance of re-development.
3. That sites within Zones of Archaeological Interest will be subject to consultation with the City Archaeologist and archaeological assessment prior to a planning application being lodged.
4. That the National Monuments Service will be consulted in assessing proposals for development which relate to Monuments and Zones of Archaeological Interest.
5. To preserve known burial grounds and disused historic graveyards, where appropriate, to ensure that human remains are re-interred, except where otherwise agreed with the National Museum of Ireland.
6. That in evaluating proposals for development in the vicinity of the surviving sections of the city wall that due recognition be given to their national significance and their special character.
7. To have regard to the Shipwreck inventory maintained by the DAHG. Proposed developments that may have potential to impact on riverine, inter-tidal and sub-tidal environments shall be subject to an underwater archaeological assessment in advance of works.
8. To have regard to DHLGH policy documents and guidelines relating to archaeology.

#### **6.4 Site Description**

The development site comprises religious institution buildings to the south with a large green field and car parking area making up most of the site to the centre and north. There are mature trees and stone walls to the east with mature trees and modern concrete block walls to north and west (see Appendix 6.1, Figure 6.1).

#### **6.5 Consultation**

Consultation with the following statutory bodies was undertaken at different stages during the archaeological assessment. These are set out below.

- A licence application and methodology to use a detection device for archaeological purposes was submitted to the DHLGH under Section 2 of the National Monuments Act 1987 (as amended). The application was approved by DHLGH in consultation with the NMI (licence 19R0212). A final report was submitted on 20<sup>th</sup> December 2019.
- A licence application and methodology to excavate test trenches was submitted to the DHLGH and NMI under Section 26 of the National Monuments Act 1930 (as amended). The application was approved by DHLGH in consultation with the NMI (19E0709). A final report was submitted on 20<sup>th</sup> December 2019.

#### **6.6 Aims of the Archaeological Impact Assessment**

The objective of this study was to assess the significance of the receiving archaeological

environment and the impact of the proposed development. Ameliorative measures are proposed where necessary and feasible, to safeguard any monuments, features or finds of antiquity that are identified during this study as likely to sustain significant impacts.

## 6.7 Description of Receiving Environment

### 6.7.1 Archaeological and Historical Background

Clonskeagh was originally part of the Pembroke Township which surrounded the townland of 'The Forty Acres'. The township was composed of Baggotrath and Ringsend to the northwest and north; Simmonscourt, Sandymount and Merrion to the east; and Donnybrook and Clonskeagh to the south and southwest. These forty acres are mentioned in some of the earliest deeds for this area.

The River Dodder flows through this township and high roads led from the metropolis to the surrounding countryside. The Early Christian period is reflected within the surrounding landscape of Clonskeagh. A holy woman by the name of St. Broc erected a church in what is now recognised as Donnybrook. The original placename was Domhnach-broc which translates into 'the church of St. Broc' (Ball 1902–20). The Early Christian period, however, also saw the arrival of the Norsemen who through frequent raids brought with them a period of unease. The Forty Acres represented the northern boundary of the Donnybrook lands during the early stages of the Anglo-Norman settlement. Clonskeagh translates as 'the meadow of the white thorns' and was sometimes called 'Little Rabo', the ancient form of Roebuck which was the adjoining district situated to the south of the Forty Acres beyond Donnybrook. The River Dodder divided this land. There is evidence for the quarrying of stone from the lands adjacent to Clonskeagh by the last grantee under the city, Maurice Fitzgerald. The beginning of the fourteenth century saw these areas occupied by a feudal castle and by a village for the housing of those employed by the lord of the Rath (Ball 1902–1920). A mill which operated by water fed through a channel connected to the River Dodder was also established.

### 6.7.2 Record of Monuments and Places

The Record of Monuments and Places (RMP) was consulted in the preparation of this report. There are no recorded monuments located within the site boundary. The closest monument to the subject site is the site of a ringfort (DU022-089; Clonskeagh) located 325m to the southeast. Additional adjacent monuments are located 500-600m from the subject site. These surrounding monuments are indicative of medieval and post-medieval activity in the surrounding landscape and comprise an ecclesiastical complex and enclosure with associated house, windmill and fortified house at Donnybrook (DU018-060). Additional sites include an unclassified castle site (DU022-088; 450m south). The closest RMPs to the subject site are listed in Table 6.1 below (Appendix 6. 1, Figure 6.1).

**Table 6.1: Archaeological sites within 1 km of the proposed development**

SMR No	Class	Townland	ITM	Distance to site
DU018-058- ---	House - 16th/17th C	Dublin South City	716558, 731840	600m NW
DU018-060001-	House - 16th/17th C	Donnybrook East	717605, 731538	575m ENE
DU018-060006-	Windmill	Donnybrook West	717606, 731533	575m ENE



SMR No	Class	Townland	ITM	Distance to site
DU018-060009-	Ecclesiastical enclosure	Donnybrook East	717604, 731537	575m ENE
DU018-060010-	Ecclesiastical site	Donnybrook West	717537, 731557	525m ENE
DU018-060011-	Graveyard	Donnybrook West	717540, 731562	525m ENE
DU018-060012-	Cross	Donnybrook West	717537, 731562	525m ENE
DU018-060020-	House - fortified house	Donnybrook West	717604, 731534	575m ENE
DU018-060021-	Enclosure	Donnybrook East, Donnybrook West	717615, 731534	580m ENE
DU018-060023-	Tomb - unclassified	Donnybrook West	717537, 731557	525m ENE
DU018-060024-	Headstone	Donnybrook West	717537, 731557	525m ENE
DU018-060025-	Headstone	Donnybrook West	717537, 731557	525m ENE
DU018-061- ---	House - 18th/19th C	Dublin South City	717356, 731731	500m NE
DU022-082001-	Ritual site - holy well	Dublin South City	717602, 731372	515m E
DU022-082004-	House - 16th/17th C	Donnybrook West	717639, 731287	540m E
~DU022-084- ---	Battlefield site	Dublin South City	-	350m SW
DU022-088- ---	Castle - unclassified	Dublin South City	716740, 730644	450m S
DU022-089- ---	Ringfort - unclassified	Clonskeagh (Dublin By.)	717122, 730788	325m SE
DU022-090- ---	Bridge	Clonskeagh (Dublin By.)	717367, 730686	600m SE

Source: [www.archaeology.ie](http://www.archaeology.ie)

### 6.7.3 Cartographic Sources

Analysis of historic mapping can show human impact on landscape over a prolonged period. Large collections of historical maps (pre- and early Ordnance Survey maps as well as estate or private maps) are held at the Glucksman Map Library, Trinity College and other sources (UCD Library, Ordnance Survey Ireland, local libraries and published material). The development of the site and its vicinity recorded through the eighteenth to twentieth century cartography are described in Table 6.2 below (Appendix 6.1, Figures 6.2 – 6.4). The subject site is depicted as a Greenfield area/parkland until the early-mid 19C. The current buildings at Milltown Park are first shown on the first edition OSI 6" map and are seen to have been modified/extended on subsequent mapping. **No new features of archaeological potential were recorded within the subject site.**

**Table 6.2: Cartographic Sources Relating to the Site**

Map	Date	Description
Rocque	1760	The site is shown as agricultural land in an area of farmland/greenfield. Some buildings can be seen fronting onto Milltown Road and clustered opposite the junction at (present day) Prospect Lane. Further south, Milltown House and demesne can be seen. Belmont Avenue is visible to the north of Sandford Road. The general area around the subject site is annotated 'Coldblow', although the roadway along present day Belmont Avenue is depicted but un-named.
Rocque & Scalé	1773	Reprint of Rocque's map with additions by Bernard Scalé. 'Coldblow Lane' is marked along (present day) Belmont Avenue. The probable location of the Coldblow House complex can be seen more clearly opposite the junction of Milltown Road and Prospect Lane.
Taylor South Map	1816	The site is shown within a wooded area/demesne land with Milltown House marked further south and beyond the (current day) junction with Prospect Lane. Some buildings (?Coldblow House) can be seen clustered at this junction. Coldblow Lane (current day Belmont Avenue) is clearly marked to the north of Sandford Road extending towards Donnybrook.
Duncan	1821	The subject site is annotated "Cold Blow Demesne", although buildings can now be seen within the subject site with an entrance avenue extending south from Sandford Road. Cold Blow Lane is shown as the current Belmont Avenue directly opposite the entrance on Sandford Rd.
1st Edition Ordnance Survey Map	1844	The subject site is depicted within demesne lands on the boundary between Clonskeagh and Milltown. The land is set out as the grounds of a single residence shown as "Milltown Park" with the entrance off Sandford Road in its current location. The building within the subject site is located at the SE corner of the present institutional complex with an elongated projection to the west.
2nd Edition Ordnance Survey Map	1888-1913	Milltown Park buildings have been extended; the grounds remain the same.
3rd Edition Ordnance Survey Map	1908	No change in layout of subject site from the previous edition.

#### 6.7.4 Aerial Photography

Aerial photography (or other forms of remote sensing) may reveal certain archaeological features or sites (earthworks, crop marks, soil marks) that for many reasons may not be appreciated at ground level. Online orthostatic photographs of the site were examined (Ordnance Survey Ireland 1995, 2000 & 2005; Google Maps).

The 1995 Aerial Photograph shows the subject site in its current layout and little changes until 2012 when temporary buildings and car parking are shown on the east side of the site (now removed; Appendix 6.1 Figure 6.5).

### 6.7.5 Previous Archaeological Excavations

The Excavation Bulletin is a database of summary accounts of archaeological excavations in Ireland and Northern Ireland from 1970 to 2018. Reports on licensed archaeological works are also held by the Archive Unit of the National Monuments Service. **There have been no archaeological investigations within the subject site. Archaeological investigations have taken place to the immediate west of the site (Sandford Lodge and Moyne Road) revealing no archaeological features.**

**Table 6.3: Previous Archaeological Investigations in the Wider Area**

Licence No.	RMP	OS Ref	Location	Ex. Bulletin Ref.	Author
09E0471		719835, 733596	Milltown	2009:352	N. O'Flanagan
Test excavation was carried out on the site with a view to establishing if there were any archaeological remains prior to the proposed development of a single detached two-storey house. The site formed a portion of the rear garden of a 19th-century house facing Milltown Road and is adjacent to the recent Milltown House development, previously the site of Mount St Anne's convent and school. Two test-trenches were excavated by machine indicating the existence of a thick deposit of garden soil of 19th century vintage, corresponding to the construction of Elm Grove House. There were no other archaeological features noted.					
02E0803		716126, 730527	Milltown	2002:0564	C. Walsh
Testing was undertaken at a site at Milltown Path, Dublin 6, on 24 June 2002. The site is close to the encampment and battleground of the 1649 Battle of Rathmines. No archaeological features are present on-site.					
15E0381	DU022-081	716311, 731119	Moyne Rd Ranelagh	2015:347	A Collins
Monitoring was carried out with regard to the proposed modification and extension to 109 Moyne Road, Ranelagh, D6, a protected structure (DCC RPS no: 5787). The proposed works involve constructing an extension to the rear, complete with demolition of existing rear garage and construction of new shed & a car port entered by existing access off common lane. The site would have been countryside in the 17th century, located on the outskirts of Dublin. It was the site of a bloody battle where up to 1000 people were killed (the numbers vary greatly). Nothing of archaeological significance was identified.					
99E0022	SMR 09:28	716662, 730627	Milltown	2000:0329	F. Myles
This entry describes the results of a second phase of assessment on a large development site incorporating the former St Anne's Convent. The first phase of assessment was undertaken in January 1999 (Excavations 1999, 88–9), and monitoring of site development works has been undertaken, as necessary, since construction commenced during the late summer of 1999. The site has a number of well-documented medieval associations, although no record of a castle or house of medieval date is recorded. The site is best known for possessing an important early 18th-century building, Milltown					

Licence No.	RMP	OS Ref	Location	Ex. Bulletin Ref.	Author
04E1183	N/A	717126, 732127	Ranelagh	2004:0635	G. Scally

House, which is being conserved and retained within the scheme. No remains of medieval date was revealed in the assessment or during several periods of monitoring of site development works. A second phase of test excavation had to await demolition of a wing and several annexes to the rear of the 19th-century convent building, almost all of the demolished structures had basements, which extended up to 6m from the retained main block of the building. During monitoring of an engineering test-pit at the rear of a demolished portion of the building, a limestone wall was revealed, and excavation was suspended temporarily. The wall (Wall 1) was found to be the poorly preserved remains of a roughly constructed limestone foundation containing brick that, although fragmentary, appeared to be handmade. The surviving portion, revealed in section at a depth of 1.1m below present ground level, survived to roughly 0.5m in height. Approximately 1.1m from it but separated by a backfilled trench (possibly the engineering test-trench), were further fragmentary masonry remains (Wall 2). Wall 2 was associated with the very ephemeral remains of a cobbled surface. Clearly earlier than the convent building, this wall appears likely to date to the 18th century and to be associated with Milltown House. Both walls are likely to be contemporary. No archaeological remains of any sort were noted. At the extreme west of the proposed development area, and extending away from it, were the disturbed remains of a limestone and redbrick wall foundation. The fabric of the wall suggests an 18th-century date rather than an earlier structure. There were no associated datable finds. The long trench excavated across the site footprint suggests that there are no remains of archaeological significance within the proposed development area, but the trench cannot be said to have covered the proposed site of deep excavation comprehensively.

Monitoring in advance of and during the construction phase of a mixed apartment/office development took place on the site between August and October 2004. Although the site lies outside the area of archaeological potential as designated by Dublin City Council, and there were no known archaeological features on the site, a condition to monitor the site was imposed due to its extensive size (c. four acres) and proximity to areas of historic interest (i.e. the site of the battle of Rathmines, and the 19th-century Bewley estate). Prior to development the site was occupied by a mid-19th-century house, the former home of the Bewley family, and by a mid-20th-century block-built building, the former National College of Ireland's College of Industrial Relations. The Bewley home is a protected structure and has been retained and incorporated into the new development; the former College of Industrial Relations was demolished. The remaining area of the site was comprised of trees, low-lying scrub and unused ground. Topsoil to a depth of 0.4m maximum was removed from the area north and south of the 19th-century house. In the area south of the house, topsoil was found to contain a significant scatter of 17th-19th-century pottery fragments, animal bone, oyster shells and a small quantity of brick and stone rubble. A stone-lined drain and a red-brick pipe drain were also found. Ephemeral traces of pits, probably the remains of formal planting areas, were uncovered to the fore of the house. To the rear of the house, traces of 19th/20th-century pottery and rubble were found. These remains were considerably less concentrated than the earlier remains south of the house; one stone-lined and stone-lintelled drain traversed this area. The archaeological finds suggest that the site, prior to construction of the Bewley home in the mid-19th century, was used for dumping domestic refuse of 17th-19th-century date. After the house was built a small amount of refuse continued to be dumped. The pottery assemblage collected (identified by Clare McCutcheon) contains a range and selection of

Licence No.	RMP	OS Ref	Location	Ex. Bulletin Ref.	Author
pottery typical of this period. No other finds or features of any archaeological significance were uncovered.					
14E0408	DU018-058	716560, 731829	130 Ranelagh Rd	2016:776	F. Bailey
Monitoring was carried out as part of a residential development. The development area occupies the constraint area for DU018-058, listed as the site of a 16th/17th-century house. A desktop assessment carried out in 2007 highlights that Cullenswood House is thought to have been located here. Testing took place on the site on 28 October 2014, under licence 14E0408 but nothing of archaeological significance was identified. Monitoring was carried out during ground works associated with a residential development in 2016. The development of the site is clearly illustrated within the historic cartographic resource. A house was constructed on the site in the late 19th century, which was demolished in the 1970s. The remains of this structure and its backfilled basement were identified during the programme of testing. During monitoring in 2016, further remains of the demolished house and backfilled basement were identified, but the basement was not re-excavated. The foundations walls of a small rectangular outbuilding associated with the demolished house were recorded. No features or deposits relating to the site of a 16th/17th-century house were noted.					
19E0417	DU018-088	716604 730853	Gonzaga College, Milltown, Dublin	2020:062	C Walsh
Test excavation of the rugby pitch at Gonzaga was a planning requirement when the school planned to construct an all-weather pitch. The archaeological monitoring of topsoil stripping to subsoil showed extensive existing drainage on the site, and spreads of late 19th-century and later litter through the grass and topsoil. No archaeological material of any significance was recovered.					
17E0224	DU018-060009	717467 731545	The Crescent, Donnybrook, Dublin	2018:179	F Bailey P Duffy
Testing was carried out at The Crescent, Donnybrook, Dublin 4 as part of a pre-planning assessment. It follows an earlier assessment carried out by Faith Bailey and Brenda Fuller of IAC Ltd in July 2016. The desktop assessment initially concluded that the close proximity to a possible early medieval ecclesiastical enclosure (DU018-060009) lends archaeological potential to the proposed development area, despite the development it has seen in the past. Also, its function as part of the Magdalen Laundries has made it sensitive due to the potential for burials in the area. Nineteen archaeological test trenches were excavated in two areas of the site, targeting anomalies identified during a geophysical survey conducted by Earthsound Geophysics Ltd in May 2017 (Licence 17E0224). Despite the identified archaeological potential of the site, no evidence for burial activity, or other archaeological features, was recorded during the course of testing. In all excavated trenches, the natural subsoil was encountered directly beneath modern surfaces/construction layers. It appears that the ground surface has been scarped and reduced across the site during construction works dating to the later 20th century. It must be concluded therefore that the GPR anomalies were the result of a compacted layer of hardcore identified beneath the modern surfaces across the tested areas. Some variations within the natural subsoil, such as the pocket of fine sand noted within Trench 16, may also account for some of the anomalies.					

Source: [www.excavations.ie](http://www.excavations.ie)



### 6.7.6 Topographical Files

The National Museum of Ireland Topographical Files is the national archive of all known antiquities recorded by the National Museum listed by county and townland/ street. These files relate primarily to artefacts but also include references to monuments and contain a unique archive of records of previous archaeological excavations. The Museum files present an accurate catalogue of objects reported to that institution from 1928. No stray finds are recorded within the subject site. However, there is a report concerning the discovery of human remains on an adjacent site at Cherryfield Avenue Upper, beyond the southwestern site boundary. The long bones of 2-3 individuals were found during building works. The bones are undated.

**Table 6.4: Topographical Files of the National Museum of Ireland**

Location	Museum No.	Description
Cherryfield Ave Upper	2014:158	Human Remains found to rear of house during building works. Long bones but no skulls found indicating 2-3 individuals. Clay pipe found close to bones. The houses were built in 1901 and the back garden of this property had been artificially raised prior to the current owners.
Wasteland between Palmerstown Rd & Windsor Rd.	2000:20	Fragment of late medieval Dublin type ware cooking pot
Rear of 20 Mornington Rd	IA/47/77	Brick built structure of unknown function. Fragments of animal bone, oyster shell & scallop shell beside structure.
Ranelagh Close	2000:42-44	3 sherds of post medieval pottery.
Seaview Terrace, Ballsbridge	SA1900:29-30 SA1900:41	Bone spindle whorl (29) bone comb plate (30) & flint flake (41) recovered from antiquarian excavation of the 'Great Sepulchral Mound' at Donnybrook.
Seaview Terrace, Ballsbridge	2003:95	Human bones in vicinity of known burial site
Seaview Terrace, Ballsbridge	2007:41	Viking sword

### 6.7.7 Architectural Heritage

Local Authorities have a statutory responsibility to safeguard architectural heritage in accordance with Part IV of the Planning and Development Act 2000. Under S.51 (1), a County Council must compile a Record of Protected Structures (RPS), which lists all structures that are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. The protection, unless otherwise stated, includes the exterior and interior of the structure, lands lying within its curtilage (boundary), other structures and their interiors within the curtilage, plus all fixtures and fittings that form part of the interior or exterior of any of these structures. Buildings can be added to, or deleted from the RPS at any time in accordance with Section 55 of the Planning and Development Act 2000, although generally this occurs when the county development plan is being reviewed.

There are no protected structures located within the subject site. The closest protected structures are listed below in Table 6.5 and located on Figure 6.1 (see Appendix 6.1). In addition to numerous adjacent entries listed on Sandford Road and Clonskeagh Road (St. James's Terrace), the subject site is located in close proximity to an Architectural Conservation Area at Belmont Avenue, Mt. Eden Road and environs. Belmont Avenue was originally called Coldblow Lane. It provided a link from the Coldblow House demesne to the village of Donnybrook. Rocque's Map of 1760 shows the general area to be agricultural land with a cluster of buildings facing the (present day) junction of Milltown Road and Prospect Lane, the location of which is preserved in the townland boundary between Milltown and Clonskeagh. The buildings here have associated gardens.

Taylor's (1816) map shows the site as demesne/wooded land, although (present day) Belmont Avenue is marked 'Coldblow Lane'. Duncan's map (1821) and the first edition OSI 6" sheet (1839) both show buildings on the site. The building recorded on the First Edition 6" sheet would appear to be located near the SE corner of the present institutional complex with an elongated projection to the west. The buildings noted on Rocque's map can be seen outside and south of the subject site, albeit partially removed along the roadfront. Lewis (1837) in his entry for Milltown states '*The neighbourhood is adorned with many respectable residences, from several of which splendid views of the bay and city of Dublin are obtained, as well as of the Wicklow mountains: among them are Milltown Park, the residence of G. Russell, Esq.*'. The site was acquired in 1858 by the Jesuit order (Curtis 2017). By the early 20<sup>th</sup> Century the main building appears to have been rebuilt and/or modified. A 1903 landholding map shows the institutional complex as a T-shaped building with the addition of the chapel projecting to the west. This was further extended to the southeast, as can be seen on the 25" map of the area.

Accepting Rocque's depiction, the most likely location of the original Coldblow House is opposite the junction of Milltown Road and Prospect Lane. This area would appear to lie directly south of and outside the subject site. Scale's 1773 reprint of Rocque's map (with additions and modifications) shows a substantial building partially extending into the roadway at this location. In the late 18C or early 19C, the road network appears to have been modified and the first edition 6" map shows the probable Coldblow House complex as partially cut by Milltown Road. Also, a substantial building can now be seen within the subject site which has, by this period been restyled as 'Milltown Park'. Successive alterations and modifications can be seen at the current institutional complex in subsequent mapping. The probable Coldblow House complex can be seen on early 20C mapping. This location is outside the red-line area and currently a carpark. A separate Architectural Heritage Assessment has been undertaken for the scheme by Molloy and Associates and presents an appraisal of architectural heritage impacts arising from the proposed development.

**Table 6.5: Record of Protected Structures**

RPS	Location	Description
7428	Sandyford Lodge, Sandyford Close, Sandyford Road, Dublin 6	Commercial
7456	87 Sandford Road, Dublin 6	House
7457	89 Sandford Road, Dublin 6	House
7458	132 Sandford Road, Dublin 6	House
7459	134 Sandford Road, Dublin 6	House
7460	136 Sandford Road, Dublin 6	House

RPS	Location	Description
7461	138 Sandford Road, Dublin 6	House
1909	2 Clonskeagh Road, Dublin 6	House (1 St. James's Terrace)
1910	4 Clonskeagh Road, Dublin 6	House (2 St. James's Terrace)
1911	6 Clonskeagh Road, Dublin 6	House (3 St. James's Terrace)
1912	8 Clonskeagh Road, Dublin 6	House (4 St. James's Terrace)
1913	10 Clonskeagh Road, Dublin 6	House (5 St. James's Terrace)
1914	12 Clonskeagh Road, Dublin 6	House (6 St. James's Terrace)
1915	14 Clonskeagh Road, Dublin 6	House (7 St. James's Terrace)
1916	16 Clonskeagh Road, Dublin 6	House (8 St. James's Terrace)
1917	18 Clonskeagh Road, Dublin 6	House (9 St. James's Terrace)
1918	20 Clonskeagh Road, Dublin 6	House (10 St. James's Terrace)
1919	22 Clonskeagh Road, Dublin 6	House (11 St. James's Terrace)
1920	24 Clonskeagh Road, Dublin 6	House (12 St. James's Terrace)
5248	1 The Colonnade, Milltown Road, Dublin 6	House
5249	2 The Colonnade, Milltown Road, Dublin 6	House
5250	3 The Colonnade, Milltown Road, Dublin 6	House
5251	4 The Colonnade, Milltown Road, Dublin 6	House

#### 6.7.8 Walkover Survey

The site was visited on 29th July 2019 in dry, sunny conditions (Plates 1–2). The site is composed of two broad elements; the former Jesuit buildings around Milltown Park which makes up one quarter of the site along its southern extent and a green area and car parking to the northern end which comprises three quarters of the site. The main entrance is off Sandford Road which is approached via a fine recessed entrance with cut-stone gateposts and wall. There are mature trees and hedgerow to all sides with the remains of a former temporary building and car park in the centre of the site. The western half is composed of an untouched field which slopes gently south to north and is set out in rough grass with informal paths around the edges. The remains of a former field boundary run north-south through the centre of the site with a small green area and the central carpark to the east. On the eastern boundary with Milltown Road and Sandford Road there is a wide band of mature trees with the remains of a former pathway through it. To the south of the site are the main buildings of Milltown Park with further car parking to the rear. **There was no clear archaeological potential identified in the field survey.**

#### 6.7.9 Geophysical Survey

A Geophysical survey was undertaken across the site under detection device consent 19R0212 issued to R O'Hara by the DHLGH. The survey data was dominated by modern ferrous responses and magnetic disturbance indicative of recent activity. There was a single response of potential interest located towards the SW of the survey area consisting of a potential ring-ditch which proved to be non-archaeological following test trenching (Appendix 6.1 Figure 6.6). Mean magnetic response over the area was 0.02nT to 0.11nT. **No further archaeological potential was noted in the geophysical survey.**

### 6.7.10 Test Excavation

Test excavation was undertaken on 5<sup>th</sup> December 2019 in overcast conditions under licence 19E0709 issued by the DHLGH in consultation with the NMI. Test trench locations were agreed in advance with the DHLGH and sought to test geophysical anomalies and the general archaeological potential of the site. All test trenches were excavated with the aid of a 14-tonne mechanical excavator equipped with a toothless grading bucket and under constant archaeological supervision. Trenches were excavated as far as the upper subsoil surface or the top of the upper archaeological horizon. Trenches were backfilled following completion of archaeological works. A total of 16 test trenches with a combined length of 563 linear metres were excavated within the Greenfield portions of the site (Appendix 6.1 Figure 6.7; Plates 3-6). No archaeological features were discovered during test excavations. The potential archaeological feature recorded during geophysical survey revealed a concentration of buried rubble (brick and stone fragments) interpreted as early modern demolition rubble. **Numerous plough furrows, service trenches and drains were observed and interpreted as non-archaeological.**

## 6.8 Characteristics of the Proposed Development

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

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

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

apartments; Block F will range in height from 5 No. storeys to part 7 No. storeys and will comprise 92 No. Build-to-Rent apartments; and the refurbished Tabor House (4 No. storeys including lower ground floor level) will comprise 24 No. Build-to-Rent apartments.

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

The proposed works also include a new 2.4 metre high boundary wall across the site from east to west (towards the southern boundary) requiring the demolition of a portion of the red brick link building that lies within the subject site towards the south-western boundary (36.4 sq m) and the making good of the façade at the boundary. The existing Link Building is the subject of a separate application for permission (DCC Reg. Ref. No. 3866/20) that includes a request for permission to demolish that Link Building, including the part of the building on the lands the subject of this application for SHD permission. If that application is granted and first implemented, no demolition works to the Link Building will be required under this application for SHD permission. If that application is refused permission or not first implemented, permission is here sought to demolish only that part of the Link Building now existing on the lands the subject of this application for permission and to make good the balance at the red line with a blank wall.

The development also provides a new access from Milltown Road (which will be the principal vehicular entrance to the site) in addition to utilising and upgrading the existing access from Sandford Road as a secondary access principally for deliveries, emergencies and taxis; new pedestrian access points; pedestrian/bicycle connections through the site; 344 No. car parking spaces (295 No. at basement level and 49 No. at surface level) which includes 18 No. mobility impaired spaces, 10 No. car share spaces, 4 No. collection/drop-off spaces and 2 No. taxi spaces; bicycle parking; 14 No. motorcycle spaces; bin storage; boundary treatments; private balconies and terraces facing all directions; external gantry access in sections of Blocks A1, A2 and C; hard and soft landscaping including public open space and communal open space (including upper level communal terraces in Block A1, Block B and Block C which will face all directions); sedum roofs; PV panels; substations; lighting; plant; lift cores; and all other associated site works above and below ground. The proposed development has a gross floor space of c. 54,871 sq m above ground level over a partial basement (under part of Block A1 and under Blocks A2, B and C) measuring c. 10,607 sq m, which includes parking spaces, bin storage, bike storage and plant (see Appendix 6.1 Figure 6.8).

## 6.9 Description of Potential Impacts

This Cultural Heritage and Archaeology study has employed a variety of sources in conjunction with non-intrusive surveys and archaeological test excavation to make a coherent assessment of the cultural heritage risk associated with the project. The following conclusions are presented to ascertain any likely significant potential direct and indirect impacts which the proposed development may have:



- The site is large in scale.
- There are no recorded monuments situated within the site boundary. However there are a number of archaeological monuments in the townland of Clonskeagh to the east, in particular a range of sites associated with the ecclesiastical enclosure of Donnybrook (DU019-06009) 600m to the east of the subject site. The site of the Ormond Camp for the Battle of Rathmines (DU022-081) lies to the west near Gonzaga College.
- No potential archaeological features were recorded in historical maps of the subject site; the land has been relatively untouched in the last three hundred years.
- No potential archaeological features were recorded in aerial photographs of the site.
- A limited number of archaeological investigations have taken place in the vicinity of the site; none revealing any archaeological potential.
- No stray archaeological finds can be directly attributed to the subject site. A report on the discovery of human remains was made in 2014 adjacent to the SW site boundary.
- A curvilinear feature of archaeological potential was recorded in the course of geophysical survey.
- No archaeological features were recorded in the course of licensed archaeological test excavations. The curvilinear feature recorded in geophysical survey was revealed to be a modern dump of brick and rubble.

These factors indicate that there is moderate potential for the survival of buried archaeological remains at this large site.

#### 6.9.1 Construction Phase Impact

The proposed development will involve considerable ground disturbance works across the subject site including excavations (including some deep excavations for basement level provision) and other groundworks (e.g. provision of access roads and service trenches), movement of machines and storage of material in sensitive areas. The proposed development will also involve works on Milltown Road and Sandford Road to facilitate access in addition to the provision of discharge of surface water to the existing drainage network in Eglinton Road (approximately 200m from the Sandford Road / Eglinton Road junction).

The greatest threat to buried archaeological deposits occurs during large-scale removal of topsoil during the initial construction phase groundworks. Currently, there are three options available for foundation excavations requiring the removal of 64,000-70,000 m<sup>3</sup> of soils from the site. A preliminary Construction Management Plan has been undertaken in respect of this site and outlines how topsoil stripping “will be carried out in a controlled and carefully managed way and coordinated with the proposed staging for the development” (Keogh/Griffin 2021). The drainage works on Eglinton Road and road works at site access points on Sandford Road and Milltown Road will consist of upgrades/modifications to existing roadways and water infrastructure.

**Table 6.6: Foundation Construction Options**

Foundation Option No.	Foundation Option Description	Quantum of Soil Removal (includes roads & civils)	Quantum of Trip Generation to Remove Soil	Hourly/Daily Movements
1	Standard Pad & Strip Foundations to All Blocks incl. Basement	70,000m <sup>3</sup>	4,375 loads ⇒ 8,750 trips (inbound and outbound)	16 hourly movements 64 daily movements
2	Pads & Strips to All Blocks except Bored Piles to Block D & F	64,000m <sup>3</sup>	4,000 loads ⇒ 8,000 trips	16 hourly movements 64 daily movements
3	Pads & Strips to All Blocks except Ground Improvement to Block E	70,000m <sup>3</sup>	4,375 loads ⇒ 8,800 trips	16 hourly movements 64 daily movements

The potential impact is based on Guidelines for the Information to be contained in Environmental Impact Assessment Reports (EPA 2017) and Appendix 4 of the Guidelines for the Assessment of Archaeological Heritage Impact of National Road Schemes (Anon. 2006, 54). It is concluded that, in the absence of the mitigation measures described below, significant impacts on potential buried archaeological remains within the site could be caused by construction phase groundworks. These impacts would be direct, negative and permanent. There is no predicted impact on potential buried archaeological remains from the proposed road works and drainage works to be located on existing public roadways.

### 6.9.2 Operational Phase Impact

No potential impacts are identified at this moment during the operational phase as it is anticipated that issues of archaeological and cultural heritage interest will have been resolved prior to or during the construction phase.

### 6.9.3 Cumulative Impacts

No archaeological sites/features/objects have been identified to date at the subject site. Consequently, there are currently no perceived cumulative impacts identified. However, should archaeological material be recorded during the construction phase, cumulative impacts may occur. In this respect, it is noted, following examination of the excavations bulletin and relevant planning files that the results of archaeological monitoring at the following sites are pending:

- 1, 3, 5, 7, 9 & 11 Eglinton Road (PL29S.307267).
- Sandford Lodge, Sandford Close, D6 (PL29S.307375).
- 22-24 Donnybrook Road (Kiely's Public House; 309378.21).
- Alexandra College (DCC 3907/18).
- RDS redevelopment of Anglesea Stand (DCC 3144/18).
- Mount Saint Mary's and Saint Joseph's, Dundrum Road, Dundrum, Dublin 14 (SHD; ABP-310138-21).

It is further noted that final planning decisions are pending at the following sites:

- Royal Hospital Donnybrook (DCC 2843/21).
- 1 Eglinton Square (DCC 3890/14 with extension 3890/14/X1-4 and alterations 2731/21. Condition 6 of Parent Application requires archaeological impact assessment including test excavation.
- 47 Ranelagh Road (DCC 25477/21).
- Chelmsford Rd., Ranelagh (DCC 2246/20 & 2762/21).
- St. Mary's Home, Pembroke Park and 28A Clyde Lane (2704/21)

Should archaeological sites/features be recorded at the subject site in addition to any of these sites with final archaeological reports and/or planning decisions pending, there may be cumulative impacts on buried archaeological sites/features. Currently, this impact is imperceptible.

#### 6.9.4 'Do Nothing' Impact

If the proposed development were not undertaken, any potential buried archaeological features within the subject site would be preserved in-situ beneath the existing ground surface.

#### 6.9.5 Summary

The Table below summarises the identified likely significant effects of the proposed development in the absence of mitigation during the demolition and construction phase.

**Table 6.7: Summary of Construction Phase Likely Significant Effects without Mitigation**

Likely Significant Effect	Extent	Quality	Significance	Duration	Type	Probability
Construction Phase Groundworks	Site	Negative	Significant	Permanent	Direct	Likely

#### 6.10 Mitigation Measures

There are currently no archaeological remains identified within the site. However, it has been established as an area of moderate archaeological potential. In particular, the discovery of human remains adjacent to the site in an adjoining property (see Section 6.7.6) is significant. The recommendations below are made subject to the approval of the DHLGH. As the statutory body responsible for the protection of Ireland's archaeological and cultural heritage resource, they may issue alternative or additional recommendations.

##### 6.10.1 Pre-Construction Phase

Pre-construction assessments (desktop study, walkover survey, geophysical survey and test trench assessment) have been undertaken at the site. No further pre-construction assessment is proposed at this stage.

### 6.10.2 Construction Phase

**Mitigation.** All ground disturbance works across the development site will be monitored by a suitably qualified archaeologist. In the event that archaeological material is recorded during monitoring, further discussion/consultation with the DHLGH will be sought in order to ascertain the appropriate treatment (i.e. preservation by record/preservation in situ) of any additional archaeological remains. Should the DHLGH recommend preservation by record/full archaeological excavation, this work will be undertaken under the appropriate licence. The DHLGH may recommend preservation in situ, should avoidance of any newly discovered archaeological remains be possible.

### 6.11 Residual Impacts

It is not anticipated that there will be any residual impacts with the appropriate mitigation measures in place. Potential residual impacts may arise should archaeological sites or features be recorded during monitoring of groundworks as per Recommended Mitigation Measure 1. In this instance, further discussion/consultation with the DHLGH would be sought to ascertain the appropriate treatment (i.e. preservation by record/preservation in situ) of any additional archaeological remains. Should the DHLGH recommend preservation-in-situ of any site found in monitoring of construction works, this may have an impact upon future maintenance requirements, in particular, the avoidance of heavy plant/machinery, if preserved under green space.

### 6.12 Monitoring

Construction groundworks will be monitored by a suitably qualified archaeologist. Any future licensed archaeological works will require an application process including approval of proposed methodologies by the National Monuments Service of DHLGH in consultation with the NMI and notification of works.

### 6.13 Summary of Mitigation and Monitoring

The Table below summarises the Construction Phase mitigation and monitoring measures.

**Table 6.8: Summary of Construction Phase Mitigation and Monitoring**

Mitigation	Monitoring	Quality	Impact With Mitigation/Monitoring			
			Significance	Duration	Type	Probability
Archaeological monitoring of Construction Phase Groundworks	DHLGH & NMI	Neutral	Moderate	Permanent	Direct	Likely

### 6.14 Avoidance, Remedial or Reinstatement

At the present time, there are no issues pertaining to avoidance of an archaeological monument, remedial works at a monument or reinstatement of a monument, as no new archaeological material has been identified following advanced archaeological assessments. Should archaeological material be identified in the course of monitoring, the

appropriate treatment (i.e. preservation by record/licensed archaeological excavation or preservation in situ/avoidance) of these putative remains will be determined in consultation with the statutory bodies (DHLGH & NMI).

### 6.15 Interactions

Should archaeological material be recorded in the course of monitoring, there may be interactions with arboriculture requirements should newly discovered archaeological material be recorded in the future adjacent to preserved mature trees. However, the potential impact on individual trees due to any archaeological findings is not anticipated to have a significant impact on the overall biodiversity on site. The impact of the interactions between archaeology and biodiversity is considered to be long-term, not significant and neutral.

Should archaeological material be recorded in the course of monitoring, this may necessitate areas being left open to the elements for a period in order to facilitate consultation with DHLGH, processing of licences and/or full excavation/preservation-by-record of archaeological features. Consequently, in this scenario, there will be interactions with land and soils, which is considered short-term, not significant and neutral.

Should earlier building footprints be recorded in the course of monitoring, the results of any subsequent archaeological works will contribute to our knowledge of the evolution of the Milltown Park complex (see Chapter 7), which are considered long-term, not significant and positive.

### 6.16 Difficulties Encountered

No difficulties were encountered in the course of the assessment.

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## 7.0 ARCHITECTURAL HERITAGE

### 7.1 Introduction

Molloy & Associates Conservation Architects were engaged to assess architectural heritage impacts potentially arising from the proposed development of a c. 4.26-hectare site at Milltown Park, Sandford Road, Dublin 6, Do6 V9K7 by the applicant, Sandford Living Limited.

A description of the proposed strategic housing development is summarised as follows:

*'Sandford Living Limited intend to apply to An Bord Pleanála for permission for a strategic housing development at this c. 4.26 hectare site at Milltown Park, Sandford Road, Dublin 6, Do6 V9K7. Works are also proposed on Milltown Road and Sandford Road to facilitate access to the development including improvements to pedestrian facilities on an area of c. 0.16 hectares. The development's surface water drainage network shall discharge from the site via a proposed 300mm diameter pipe along Milltown Road through the junction of Milltown Road / Sandford Road prior to outfalling to the existing drainage network on Eglinton Road (approximately 200 metres from the Sandford Road / Eglinton Road junction), with these works incorporating an area of c. 0.32 hectares. The development site area, road works and drainage works areas will provide a total application site area of c. 4.74 hectares.*

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

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

*The development also includes a creche within Block F (400 sq m) with outdoor play area; and the provision of communal internal amenities (c. 1,248.8 sq m) and facilities (c. 158.3 sq m) throughout the residential blocks, Tabor House and the converted Chapel building including*

*co-working space, gym, lounges, reading rooms, games room, multi-purpose space, concierge, mail rooms and staff facilities.*

*The proposed works also include a new 2.4 metre high boundary wall across the site from east to west (towards the southern boundary) requiring the demolition of a portion of the red brick link building that lies within the subject site towards the south-western boundary (36.4 sq m) and the making good of the façade at the boundary. The existing Link Building is the subject of a separate application for permission (DCC Reg. Ref. No. 3866/20) that includes a request for permission to demolish that Link Building, including the part of the building on the lands the subject of this application for SHD permission. If that application is granted and first implemented, no demolition works to the Link Building will be required under this application for SHD permission. If that application is refused permission or not first implemented, permission is here sought to demolish only that part of the Link Building now existing on the lands the subject of this application for permission and to make good the balance at the red line with a blank wall.*

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

#### **7.1.1. Baseline architectural strategy**

The site is occupied by a large-scale institutional building range, which has been vacant since 2019.

A review of the grouping is included in Appendix 7.1. None of the structures on the site are included in the Record of Protected Structures (Volume 3 of the 2016-2022 Dublin City Development Plan) or the National Inventory of Architectural Heritage.

It is intended to retain two buildings within the grouping: the chapel and a former residential building, Tabor House, both dating from the late 19<sup>th</sup> centuries.

It is also intended to retain and modify extant early boundary walls onto Sandford and Milltown Roads, together with the entrance at Sandford Road.

It is proposed to demolish all other structures on the site.

### 7.1.2 Authorship

This assessment was conducted by Maol Íosa Molloy; BArch, BScArch, MUBC, DipArb, MRIA, RIBA, MCI Arb, Grade 1 Conservation Architect and Shelley O'Donovan; BArch, DipABRC, MRIA, RIBA accredited Conservation Architect, Grade 2 Conservation Architect, of Molloy&Associates, having over 20 years' experience working as conservation architects.

## 7.2 Study Methodology

### 7.2.1 Purpose

Chapter 7 identifies buildings and other features of heritage significance in the environs of the site, qualifies existing inter-relationships and assesses potential impacts from the site's proposed development for their respective fabric, character and settings.

The assessment also takes into account the presence of a designated architectural conservation area in the vicinity and reviews potential impacts the development may present for its character.

### 7.2.2 Basis of the Assessment

The architectural heritage assessment component of the EIAR examines the character and heritage significance of buildings and other structures within the application site and its immediate environs.

It anticipates potential impacts that the proposed development may present to these structures and places, as designed principally by the project architects O'Mahony Pike.

A Masterplan + Architectural Design Statement, by O'Mahony Pike Architects has informed in particular the scope of this assessment.

Multiple sources were consulted to ascertain the historical development of the site and assist in determining the significance of affected structures, as follows:

- Guidance on the preparation of Environmental Impact Assessment Report (Directive 2011/92/EU as amended by 2014/52/EU) (European Commission, 2017)
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out environmental impact assessment (Department of Housing, Planning and Local Government, August 2018)
- Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act, 2000; and the National Inventory of Architectural Heritage
- Planning and Development Act 2000, as amended
- Dublin City Development Plan 2016-2022 (to inform the statutory framework governing the site's development)
- Record of Protected Structures (Volume 3 of the Dublin City Development Plan 2016-2022)
- Council of Europe Convention for the Protection of the Architectural Heritage of Europe (Granada) 1985, ratified by Ireland in 1991.

- ICOMOS Xi'an Declaration on the Conservation of the Setting of Heritage Structures, Sites and Areas, 2005.
- The Burra Charter, the Australia ICOMOS Charter for Places of Cultural Significance 2013.
- Various historic cartographic sources of the site's chronological development
- The Jesuit (private) Archives (in review of the chronological development of the site)

The opinion of design team consultants has also been reviewed in respect of mitigating measures informing the proposed design. Definitive findings determined by the consultants were reviewed to corroborate architectural heritage-centric research. As such, this chapter should be read in conjunction with related documents identified below, submitted with this EIAR and its appendices:

- Archaeological Impact Assessment (Archer Heritage Planning) - Chapter 6
- Townscape and Visual Impact Assessment (Modelworks) - Chapter 9, based on montages produced by 3D Design Bureau
- Existing Buildings Feasibility (O'Mahony Pike)
- Landscape Concept Analysis - Boundary Treatment (Cameo&Partners)
- Preliminary Construction Management Plan (DBFL)

### 7.2.3 Scope

The architectural heritage assessment reviews aspects of change arising from the physical, visual or morphological impacts on the extant building complex and the surrounding environment as a consequence of the proposed development.

Assessment of extant structures within the site was based on visual inspections. Limited opening up works were confined to investigations within retained fabric.

While this report contains comments on aspects of the condition of the buildings, it is not a condition report and must not be read as such.

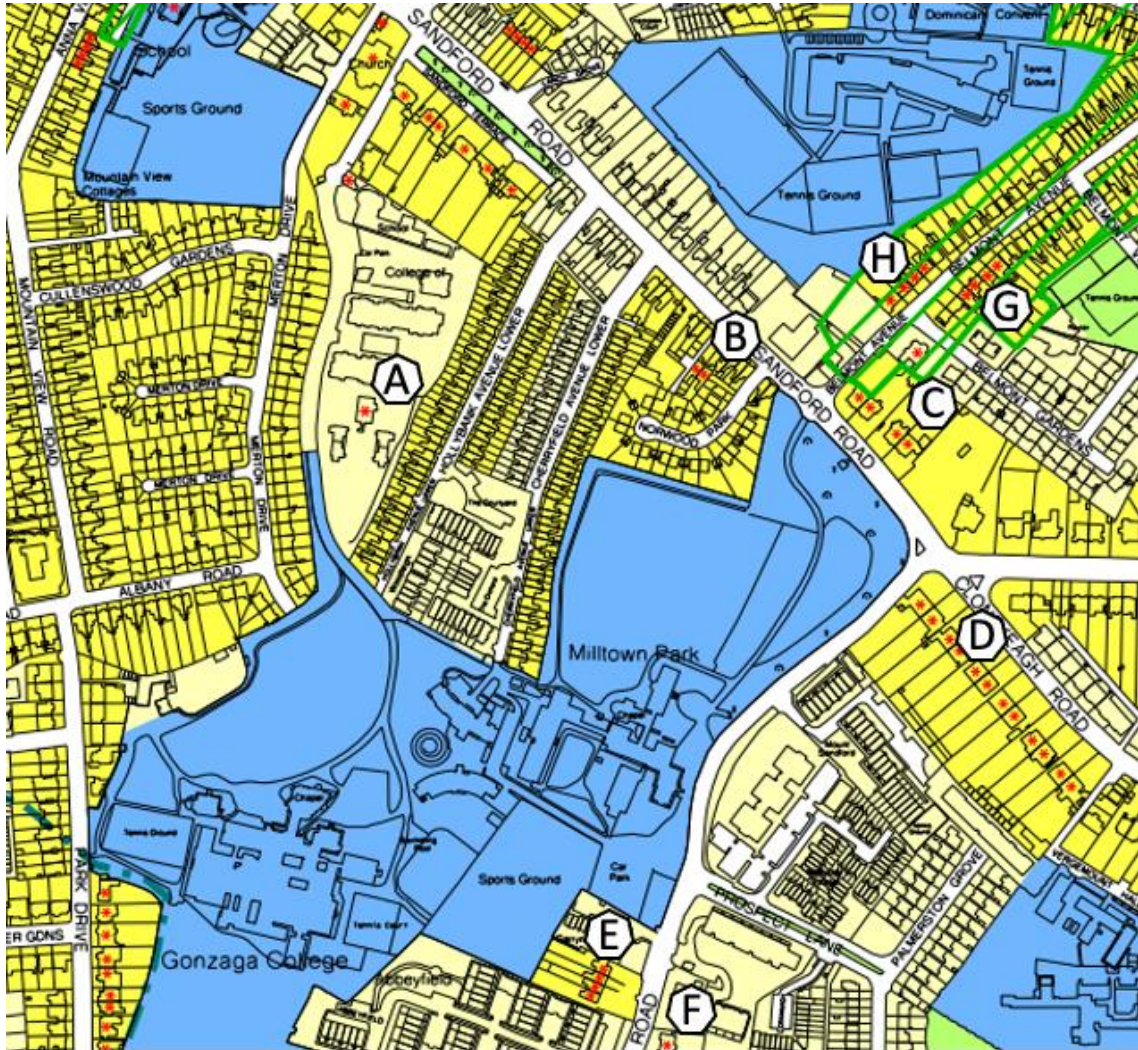
### 7.2.4 Format of the Assessment

The architectural heritage characteristics of the site and its enclosing environs in context with the proposed development is reviewed in this Chapter of the EIAR. To supplement the assessment, detail on the site's extant buildings is informed by the following appendices;

- Appendix 7.1 comprises a historical assessment of built heritage within the development site
- Appendix 7.2 comprises a photographic record of the existing building range
- Appendix 7.3 comprises a chronology of built heritage within the development site



### 7.3 The Existing Receiving Environment (Baseline Scenario)



- A Sandford Lodge
- B 87/89 Sandford Road
- C 132-138 Sandford Road
- D St. James's Terrace
- E The Colonnade
- F Greenfields
- G Belmont Avenue (east)
- H Belmont Avenue (west)

**Figure 7.3.1: Applicant site, with key protected structures in the vicinity scheduled and denoted by red asterisk, with the Belmont Avenue/Eden Road ACA hatched in green to the northeast of the site**

### 7.3.1 Statutory Context

There are no protected structures within the application site. Further, the structures are not presently included in the National Inventory of Architectural Heritage (NIAH), as the Inventory does not extend to this area.

The Belmont Avenue/ Eden Road architectural conservation area (ACA) is positioned north east of the site, as indicated by the area hatched in green in Figure 7.3.1 above, which is a detail of Map set H of the Dublin City Development Plan. A number of protected structures in the vicinity of the development site are marked on same.

### 7.3.2 Outline description of the site

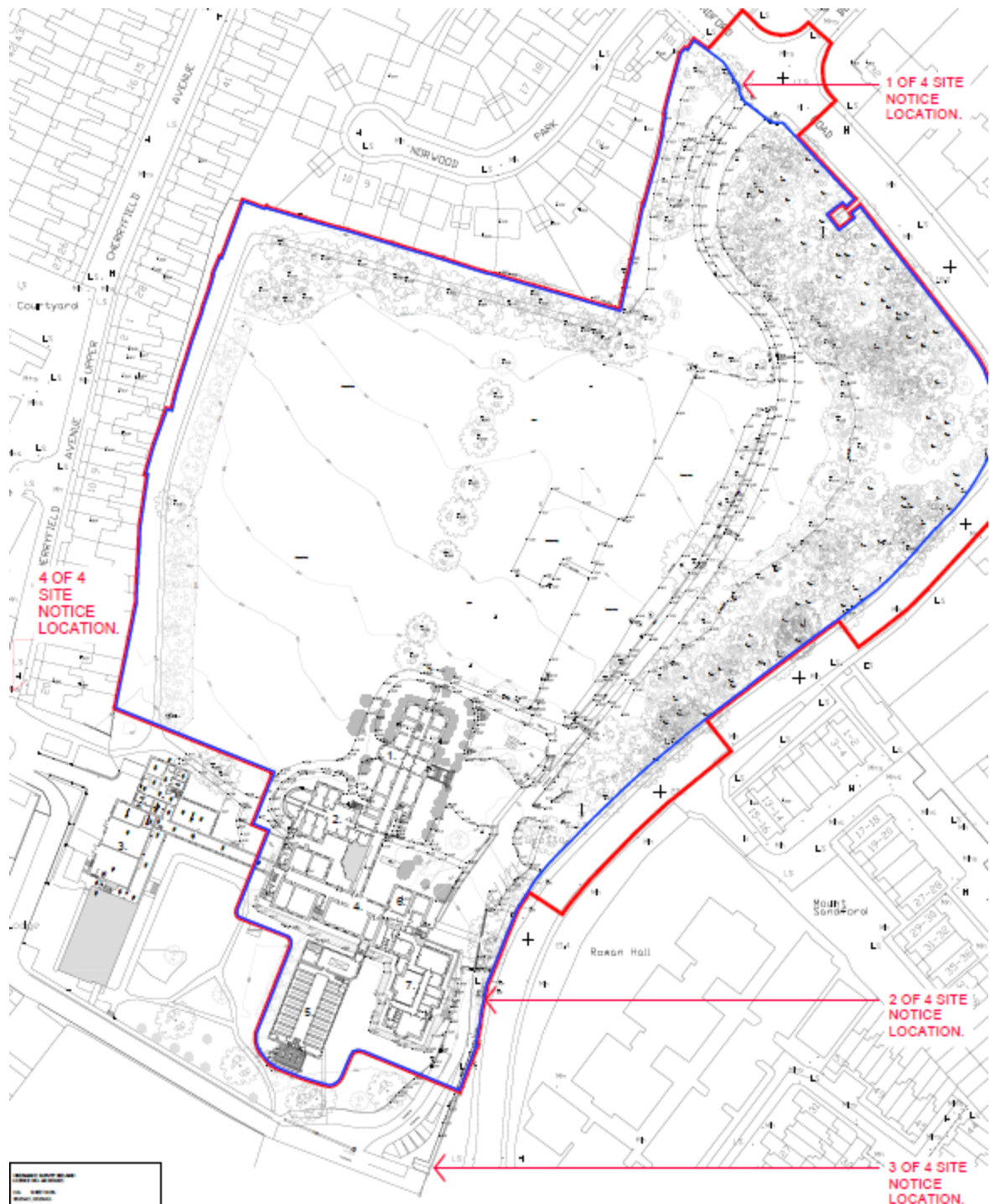
The site was formerly part of the Milltown Park Jesuit Centre, also referred to as the Milltown Institute.

The existing building group, which ranges in origin from the late-18th century through to the mid-20th century, is positioned in the southern part of the site. Historical research carried out to determine the chronological development of the property and inform the heritage appraisal is included in Appendix 7.1.

The original entrance to the Milltown Institute on Sandford Road comprises a central vehicular gate with flanking walls in granite incorporating pedestrian side gates.

The boundary wall, which is comprised of a mix of rubble stone and blockwork with harling and cement render finishes, extends from the Sandford Road entrance, around the north-east corner of the site and fronting onto a considerable length of the Milltown Road. A recently constructed entrance, leading to the remainder of the Jesuits lands that were not sold to the Applicant and are outside the boundary of the subject site, is positioned south of the building group off Milltown Road.

Milltown Park House, a late 18<sup>th</sup> century house predating the Jesuit presence on the site, serves as the main entrance to a complex of interlinked buildings comprising a unified grouping



**Figure 7.3.2: Applicant site boundary enclosing the existing Milltown Park building range**

The grouping is comprised of six distinct buildings all of which were developed by the Jesuit community as extensions to the original 18th century residence. Milltown Park House is connected to a residential building occupied by the Jesuit Community by way of a link structure, which will be partially removed (36.4 sq m) within the application lands towards the south-western boundary and the façade at the boundary will be made good, as part of the proposed development to facilitate a new 2.4m high boundary wall between the main application site and the remaining Jesuit lands that were retained in the sale of the subject site.



The Jesuit Community Buildings' entrance from Milltown Road will remain unaffected by the proposed development.

The Gonzaga College building grouping, its car parking and playing fields, positioned to the west of the Jesuit Community Buildings will remain unaffected by the proposed development.

The demesne attached to the institution is private, with meandering paths along its northern boundaries. A line of trees was planted circa 2000, to consolidate boundary conditions to the north, which framed a grassed path along the boundary, named the Millennium Walk. All historic paths shown on historic maps within the demesne are now overgrown and not evident. A car park is positioned in front of Milltown Park House. The open lands to the northeast have a parkland character abounded by a wide belt of mature trees.



**Figure 7.3.3: John Rocque's map of 1757, with a structure evident to the south of the subject development lands opposing Prospect Lane, possibly the location of the original Coldblow farmstead**



Figure 7.3.4: County of City boundary commission, 1832, the first indication of Milltown Park House



Figure 7.3.5: 1837 Ordnance Survey. Note Milltown Park House, and a range of outbuildings positioned to the southeast of the main house





Figure 7.3.6: 1847 Ordnance Survey. A similar configuration to the earlier iteration

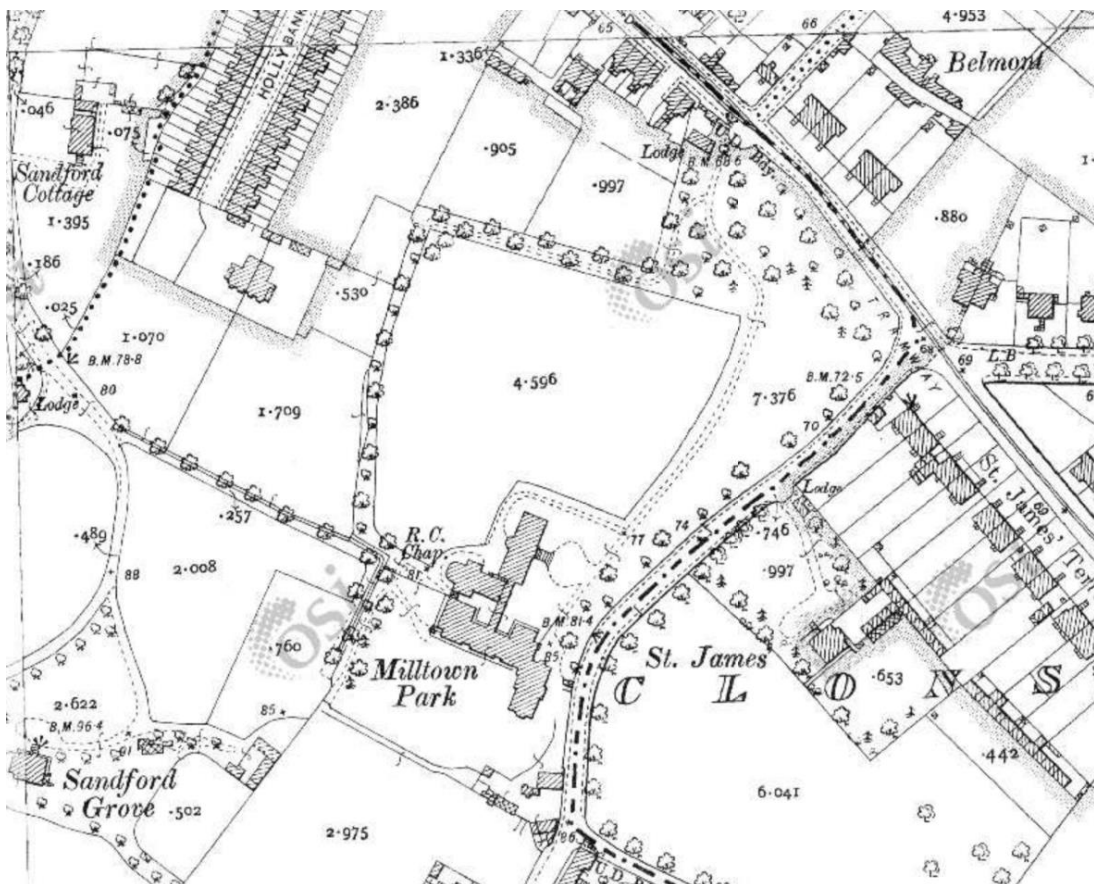


Figure 7.3.7: 1888-1913 25inch Ordnance Survey. Milltown Park House by this time was acquired by the Society of Jesus (1858), with the first wave of development evident with the exception of the Archive

### 7.3.3 Archaeology

*This section should be read in conjunction with Chapter 6 of the EIAR, Archaeology and Cultural Heritage*

Chapter 6 confirms the absence of recorded monuments within the site boundary. Section 6.7.7., par.2, par.4 of the report suggests that Coldblow farm, possibly containing what is historically referred to as Coldblow House, appears to be positioned south of the existing Milltown Park House, outside the development site boundary.

Notwithstanding the absence of known archaeology of significance, as a mitigation, it is recommended by Archer Heritage Planning Ltd that all ground disturbance works across the development site should be monitored by a suitably qualified archaeologist.

It also states:

*'Should earlier building footprints be recorded in the course of monitoring, the results of any subsequent archaeological works will contribute to our knowledge of the evolution of the Milltown Park complex'.*

### 7.3.4 The enclosing urban environment

*Please refer to a Landscape and Visual Impact Assessment (Modelworks) Chapter 9 for detailed analysis of the enclosing urban environment.*

In architectural heritage terms, the prevalent parkland characteristics of the subject development site, enclosed to the east and southeast by Milltown and Sandford Roads, differs to the dense, predominately residential character of the opposing sides of these roads.

Principal vistas towards the subject site are considered to comprise the following:

- Belmont Avenue towards the existing entrance gates on Sandford Road (within the ACA)
- The junction of Milltown/ Clonskeagh/ Eglington and Sandford Roads, towards the tall southeast boundary wall and trees beyond
- The building range, as visible above boundary walls, and viewed from the junction of Milltown Road and Prospect Lane in proximity to an entrance to the Community building range

Each of these peripheral enclosing conditions will be examined in this section.

### 7.3.5 The Belmont Ave & Mount Eden Road Architectural Conservation Area

#### **7.3.5.1 Position of the ACA relative to the subject development site**

The Belmont Avenue/ Eden Road architectural conservation area (ACA), as revised in 2015 and adopted in 2016, is positioned north east of the site, as indicated by the area hatched in green in Figure 7.3.1 above, which is a detail of Mapset H of the Dublin City Development Plan 2016-2022.

### 7.3.5.2 Origin of relationship with the subject development site

Belmont Avenue, originally named Coldblow Lane, pre-existed Coldblow demesne by approximately 30 years.

### 7.3.5.3 Characteristics of the ACA in context with the subject development site

The Belmont Avenue / Mount Eden Road ACA is defined by its network of streets and uniform terraced houses, with a corresponding policy focused on the preservation of the character of the residential streetscape.

The relationship between the subject development lands and the ACA is most evident from the gated entrance on Sandford Road where it connects visually with the west of Belmont Avenue.

The open lands at present are separated from the ACA, and protected structures on the opposing side of Sandford Road, by a berm of trees comprising dense mature vegetative screening. A masonry wall defines the boundary to the east. The outward sylvan character of the subject site is what most defines it from the public realm.



Figure 7.3.8: Extract from the Belmont Avenue/Mount Eden Road and Environs Architectural Conservation Area Character Appraisal and Policy Framework report 2015, indicating the extent of the ACA. The subject development site is in proximity to the southwestern corner of the ACA however is separated by the Sandford Road





**Plate 7.3.1:** The southern end of the Belmont Avenue/Mount Eden Road and Environs Architectural Conservation Area, as viewed from the Sandford Road entrance of the subject site

### 7.3.6 Sandford Road

#### *7.3.6.1 Position of Sandford Road relative to the subject development site*

Sandford Road aligns with the northern boundary of the site and extends from an early entrance southward to the junction with Milltown/ Clonskeagh and Eglinton Roads.

#### *7.3.6.2 Characteristics of Sandford Road in context with the subject development site*

The south of Sandford Road, where aligned with the north-eastern boundary of the development site, is defined by its residential character, with a petrol station occupying the opposing side of the road to the north of the site's entrance. The area is characterised by linear development of 18th and 19th century residences set back behind traditional railings with mature soft landscaping. The largely permeable front boundary treatments of dwellings in the vicinity of the site are in contrast with the tall, impermeable institutional boundary wall enclosing the subject site from the public realm.



**Plate 7.3.2:** View west, to Sandford Road, from the entrance to the development site



**Plate 7.3.3:** View of site due south from Sandford Road



**Plate 7.3.4:** View of the subject site to LHS of image, aligned with Sandford Road, due west from junction of Milltown Road and Sandford Road



**Plate 7.3.5:** View of the subject site's northern boundary wall, aligned with Sandford Road, due east





Plate 7.3.6: Sandford Road, due north, from the junction of Clonskeagh and Eglington Roads



Plate 7.3.7: Nos 132, 134, 136, 138 Sandford Road, opposing the subject development site

### 7.3.7. Milltown Road

#### *7.3.7.1 Position of Milltown Road relative to the subject development site*

Milltown Road forms a boundary to the southeast of the site. The section of boundary within the subject development site extends from the southern limits of the Finlay Wing eastward towards the shared junction with Sandford/ Clonskeagh and Eglington Roads.

#### *7.3.7.2 Characteristics of Milltown Road in context with the subject development site*

Milltown Road to the east of the subject development site is essentially dominated by the homogeneity of the site's tall, imposing boundary wall. Whilst trees are visible above the wall cappings, the site's sylvan character contributes minimally to the road's character. The set back of a boundary at the access to the remaining Jesuit lands to the south alleviates the hostility of the site's boundary wall.

The road's character to the west is typified by diversely aligned residential developments.



**Plate 7.3.8:** View of junction of Milltown Road and Sandford Road, with enclosed boundary to subject development site to RHS of image



**Plate 7.3.9:** Milltown Road, due north, in context with the subject grouping



**Plate 7.3.10:** The subject grouping, due north from the centre of Milltown Road, in its urban context



### 7.3.8 Clonskeagh Road and Eglinton Road

#### *7.3.8.1 Position of roads relative to the subject development site*

Clonskeagh Road is a continuation of Sandford Road, due southeast. Eglinton Road is a continuation of Milltown Road, due east.

#### *7.3.8.2 Characteristics in context with the subject development site*

The street character of both is defined by largely 19<sup>th</sup> century residential buildings, set back from the road and framed by trees.



**Plate 7.3.11:** The character of Clonskeagh Road, due east, from the junction with Sandford Road



**Plate 7.3.12:** View of site on approach from Clonskeagh Road, with St. James's Terrace on the left



**Plate 7.3.13: No.1 St James's Terrace from the junction of Clonskeagh and Eglinton Roads**



**Plate 7.3.14: View of site from junction of Sandford and Eglinton Roads**

### **7.3.9 Protected structures within the enclosing urban environment**

No protected structures around the development site. Protected structures in the vicinity of the development site front onto Sandford Road/ Clonskeagh Road and are also positioned to the southeast on Milltown Road.

**Table.7.3.1: Protected structures within the enclosing urban environment and their relationship with the subject development site***Please refer to Fig.7.3.1. above for the location of each of the key protected groups below*

<i>RPS</i>	<i>Sandford Road</i>	<i>Description</i>	<i>Relationship with site</i>
7428	Sandford Lodge, Sandford Close, Sandford Road, Dublin 6	Commercial	Sandford Lodge, a Villa style residence now in use as part of National Adult Literacy Agency. A 4-storey residential development (Sandford Lodge) has been constructed on the grounds associated with the house. Positioned due north-west, at a distance from the subject site and separated by a modern housing estate.
7456	87 Sandford Road, Dublin 6	House	A pair of 2-bay, 2 storeys over lower ground floor Georgian semi-detached buff-brick residences on the south side of Sandford Road, north of the subject side. The original setting surrounding the structures has been much altered; they are flanked by later 19 <sup>th</sup> century residences and more recent mid 20 <sup>th</sup> century housing estate known as Norwood Park.
7457	89 Sandford Road, Dublin 6	House	
7458	132 Sandford Road, Dublin 6	House	A grouping of four 19 <sup>th</sup> century, 2 storeys over lower ground floor substantial semi-detached red brick residences with stone string coursing, canted bay to front elevation, facing Sandford Road, opposite the subject site, and its entrance gate. These buildings are considered to be in proximity to the development site but are separated by Sandford Road and screened by existing vegetation along the site's northern boundary.
7459	134 Sandford Road, Dublin 6	House	
7460	136 Sandford Road, Dublin 6	House	
7461	138 Sandford Road, Dublin 6	House	
<i>RPS</i>	<i>Clonskeagh Road</i>	<i>Description</i>	<i>Relationship with site</i>
1909	2 Clonskeagh Road, Dublin 6 (1 St. James's Terrace)	House	St James Terrace is an intact grouping of two storey over lower ground floor, 3-bay semi-detached Georgian residences with hipped roofs, rendered with decorative quoins, Georgian doorcases and sash windows. The residences front onto Clonskeagh Road to the east of the subject site. No.1 St James Terrace (RPS.Ref: 1909) positioned at the junction of Milltown Road and Clonskeagh Road has a set-back wing, with windows facing west towards the subject site. The wider terrace's setting, as viewed from the junction of Clonskeagh/
1910	4 Clonskeagh Road, Dublin 6 (2 St. James's Terrace)	House	
1911	6 Clonskeagh Road, Dublin 6 (3 St. James's Terrace)	House	
1912	8 Clonskeagh Road, Dublin 6 (4 St. James's Terrace)	House	
1913	10 Clonskeagh Road, Dublin 6 (5 St. James's Terrace)	House	
1914	12 Clonskeagh Road, Dublin 6 (6 St. James's Terrace)	House	
1915	14 Clonskeagh Road, Dublin 6 (7 St. James's Terrace)	House	



1916	16 Clonskeagh Road, Dublin 6 (8 St. James's Terrace)	House	Eglinton/ Sandford/ Milltown Roads is informed by the sylvan north-eastern corner of the site.  The aspect of rear rooms is not considered to have a relationship with the subject site, given the existence of pre-existing development on lands to the southwest and dense screening to the subject site boundary.
1917	18 Clonskeagh Road, Dublin 6 (9 St. James's Terrace)	House	
1918	20 Clonskeagh Road, Dublin 6 (10 St. James's Terrace)	House	
1919	22 Clonskeagh Road, Dublin 6 (11 St. James's Terrace)	House	
1920	24 Clonskeagh Road, Dublin 6 (12 St. James's Terrace)	House	
<i>RPS</i>	<i>Milltown Road</i>	<i>Description</i>	<i>Relationship with site</i>
5248	1 The Colonnade, Milltown Road, Dublin 6	House	A terrace comprising four residences, due south of the subject site, facing onto Milltown Road.
5249	2 The Colonnade, Milltown Road, Dublin 6	House	
5250	3 The Colonnade, Milltown Road, Dublin 6	House	The development site is positioned on lands north of separate lands retained by the Jesuit Community, sharing a rear boundary with this protected grouping. The Garynure residential development is positioned north of the protected grouping and shields it from the development lands.  As a consequence of distance, the protected grouping is not considered sufficiently close to foster a relationship with the subject development site.
5251	4 The Colonnade, Milltown Road, Dublin 6	House	
5252	Greenfields, Milltown Road, Dublin 6	House	This protected structure is positioned on the opposing side of Milltown Road from the development site, to its south. Due to its considerable distance from the development site, a direct relationship is not considered to exist.

### 7.3.10 Brief summary of the historical development of the site

*Please refer to Appendix 7.1 for a more detailed account of the chronological development of the building group*

There is evidence to suggest that the Milltown Park House demesne emerged from an earlier farmed demesne named Coldblow, which incorporated a house named Coldblow House. In circa 1769 a portion of the estate, which included a 'pleasure ground', a house and avenue belonged to Mr. John Roberts who was referred to in the deeds as "of Old Connaught in the County of Dublin, gentleman". He appears to have been the owner of the land which is variously described as "a portion of Donnybrook Farm" or as a "portion of Lunt's Land". This latter designation seems to include not only this portion of the lands but also the Bewley Estate (including the Sandfort/ Sandford Demesne) to the west of it - now occupied predominantly by Gonzaga College.

The Jesuits Archive contains notes indicating that in 1782 a house existed in a similar position to the 'Ministers House', the present-day Milltown Park House. Whilst the exact date of the house is not given, the subject note states that there is "some evidence to show that it was not in existence in 1756".

In 1795 the Right Hon. Denis George, fourth Baron of the Exchequer, bought the interest in John Hewston's land on 8<sup>th</sup> December 1795. Some months later he purchased the ground belonging to John Roberts and formed a single demesne which was called 'Cold Blow'. This strange name had existed in the neighbourhood for many years and Belmont Avenue had been known as 'Cold Blow Lane' for at least thirty years. On the death of Baron George in 1819 Cold Blow passed to his eldest son and ultimately to Mr. George Fitzjames Russell in 1831 who renamed it Milltown Park.

Cartographic review suggests that the existing Milltown Park House, might have been constructed independent of an earlier Coldblow House, with the latter likely to have been positioned further south. Notwithstanding conflicting historical evidence, a detailed investigation of the fabric within Milltown Park House will be carried out to confirm layers of development within. This work will be carried out in conjunction with archaeological monitoring.

On June 9<sup>th</sup> 1858, Milltown Park was purchased from Mr. J. Calvert Stronge for the sum of £4,500, by Mr. Denis Redmond (of Belmont Lodge) who acted as trustee and agent on behalf of the Jesuit community. Shortly thereafter, Milltown Park House was significantly extended with the addition of two storeys above. It was also extended to the rear in the construction of a domestic Chapel. In the late 19<sup>th</sup> and early 20<sup>th</sup> century, a series of substantial further extensions were constructed to accommodate an increasing number of novitiates attending the centre. Some of the extensions comprised distinct buildings while others were immersed within earlier fabric. All are interconnected to varying degrees to form a single entity, with the original building serving as the principal entrance.



**Figure 7.3.9: Deed map, dating from 1903, demonstrating the sequence of land acquisition by the Community, prior to the purchase of part of the Sandfort (Sandford) Demesne, outside the applicant lands**

The Finlay Wing was serving as both an institutional building, archive and ad-hoc sleeping accommodation. Following the loss of life and its destruction as a result of an accidental fire in 1949, action was taken to alleviate congestion in the community building range and expand the campus. A portion of the neighbouring Sandfort (Sandford) Demesne and its two houses, owned by the Bewley family, was duly acquired shortly after this event. Gonzaga College was founded on the site shortly thereafter.

The distinctive characters of the respective parcels of institutional lands developed over the course of the Jesuit's presence on the site, arose in the development of three building groups;

- the subject original novitiate on the Milltown Park Lands
- the Community building range which was constructed to straddle the shared boundaries of the Milltown Park and Sandfort Demesnes
- Gonzaga School, within the Sandfort Demesne

Whilst all three groups represent the expansion of Jesuit presence in the vicinity, the Novitiate and Community grouping are connected, with clear gated boundaries separating them from the school. A single point of connection, in the form of the red brick link building (Building G), in turn connected to the novitiate from the Community building.

As a consequence, the relationship between the subject development building range and lands, and the school is in name only, as both entities 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.

Please refer to section 7.3.14 below for a further description of the separate characteristics of each group.



Figure 7.3.10: Identification of distinct buildings with the existing complex overlaid on aerial view (Google Earth)

### 7.3.11 Brief appraisal of existing structures within the site

The extant building group is comprised of six distinct buildings as follows.

- |   |   |
|---|---|
| A) Milltown Park House                      | D) Chapel (and later Sacred Heart chapel) |
| B) Milltown Park House (MPH) Rear extension | E) Finlay Wing                            |
| C) Tabor House                              | F) Archive                                |

In addition, a red brick link building, Building G, can be seen in Figure 7.3.10, a section of which is proposed to be demolished as part of the development within the application lands.





Figure 7.3.11: Identification of distinct buildings with the existing complex

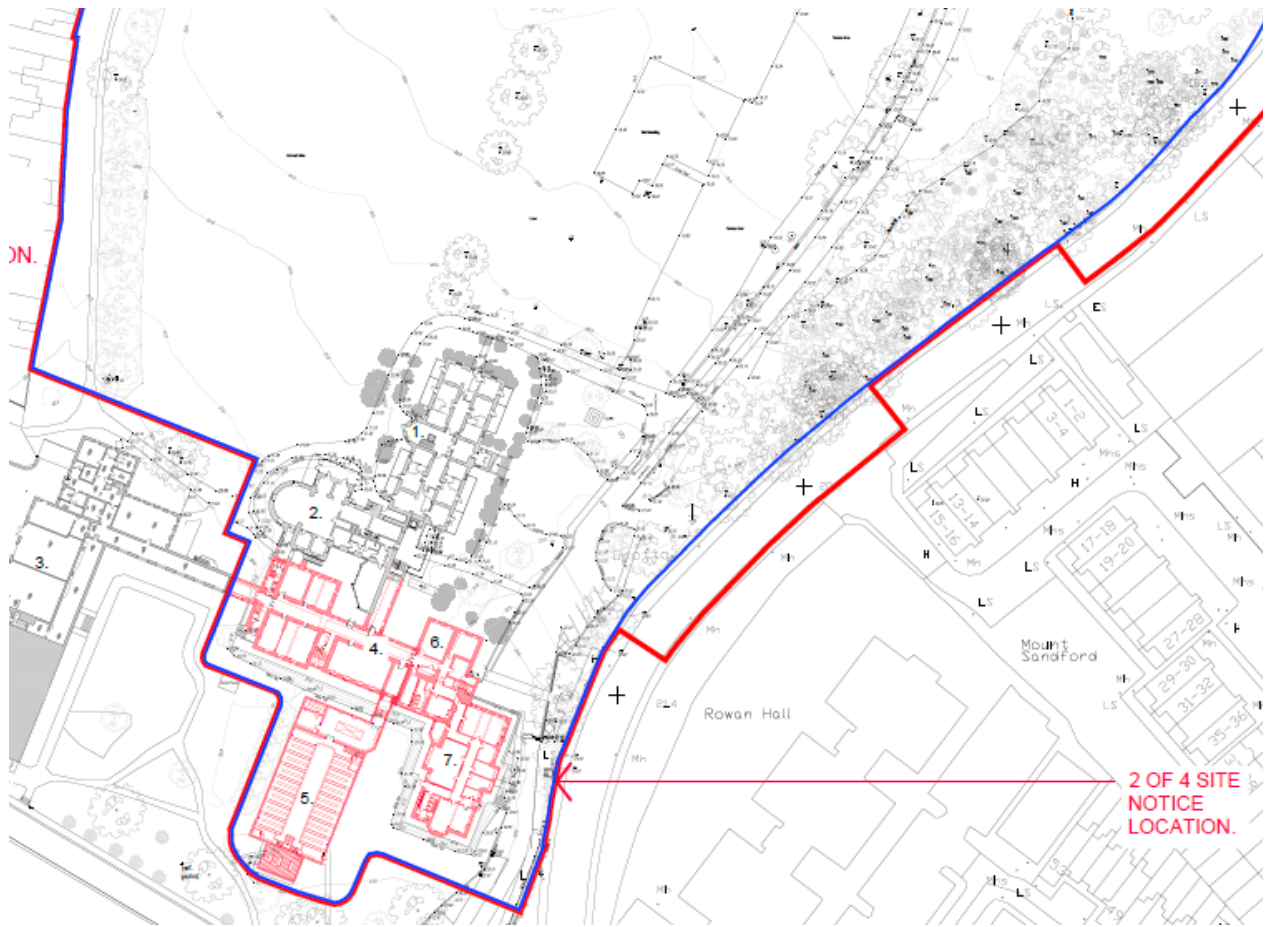


Figure 7.3.12: Proposed building retention and demolition



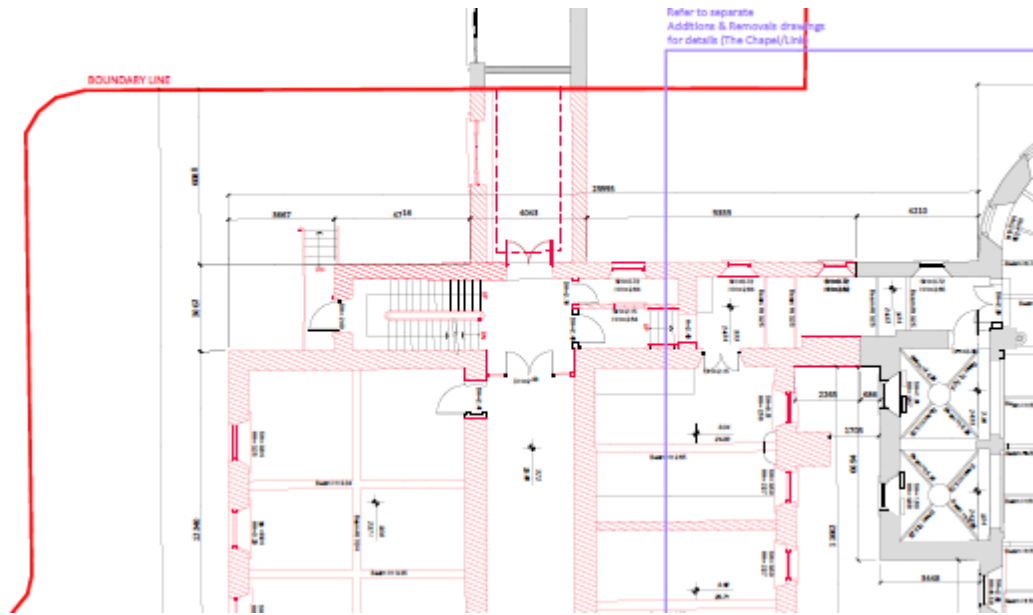


Figure 7.3.13: *Proposed retention and demolition in context with the link building and chapel*

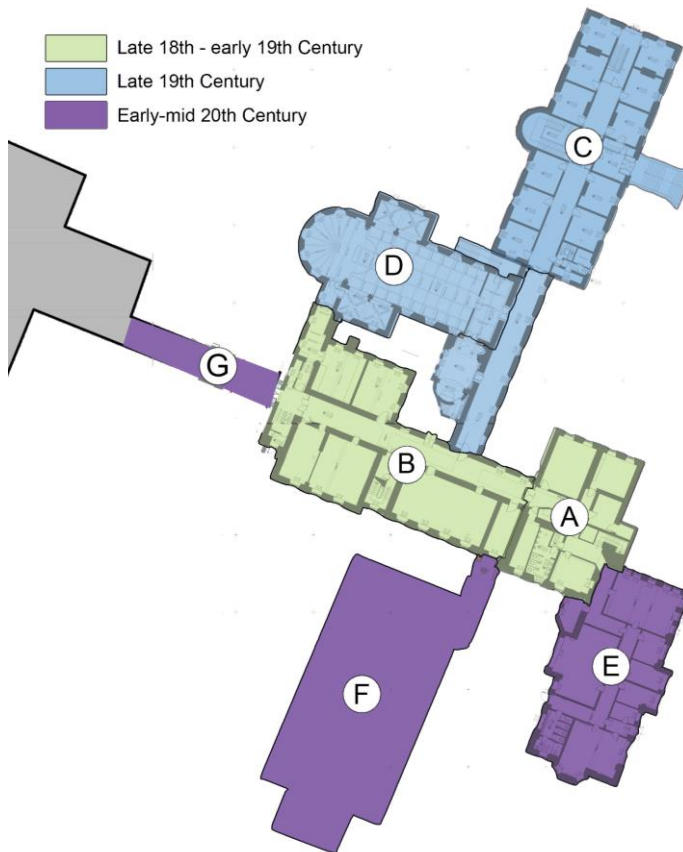


Figure 7.3.14: *Chronological development of the building range*

### 7.3.12. Buildings proposed for demolition

#### 7.3.12.1 (A) Milltown Park House (c1756)

*Please refer to Appendix 7.3 for a more detailed account and appraisal of the building fabric.*

##### 7.3.12.1.1 General characteristics

The earliest of the buildings is a late-18<sup>th</sup> century villa, constructed as a residence fronting Milltown Road, but accessed principally from Sandford Road. Its original external configuration would have comprised a two storey over basement house, with single storey projecting porch to the front, a likely substantial return to the rear, and possibly an orangery to the south. The various outbuildings, to the rear and south, outside the rectangular footprint of the main house were demolished to accommodate development as a novitiate c1860.

The original footprint of the house is most legible at basement level, with early layouts largely intact. The basement provision under the former orangery to the south corresponds in depth with the area below the reception, confirming the existence of early fabric to the south of the entrance lobby. The provision of a concrete staircase from entrance level removed a central room. The original stair configuration is not evident in examination of surviving fabric but is assumed to have traversed the original basement hall from east to west, commencing from east. Original flagstones survive in a single room to the northwest, where original walls to the north and east are also evident. All other rooms have been much altered, both in form and materially with loss of original structure. Later connections were made to the west, to link with the rear extension block, and to the south to connect with the Finlay Wing, both structures of which had basements. The precise origin of concrete internal additions is not known but is assumed to stem from mid-20<sup>th</sup> century fire rating measures separating basement plant from the principal entrance above.



**Plates 7.3.15 & 7.3.16: East (front) elevation of Milltown Park, with a detail of the original entrance door and fanlight within a much-altered context**

An entrance level reception room to the northeast survives in its original configuration; albeit with walls removed to conjoin it as a reception area attached to the entrance. All other rooms have been modified spatially beyond recognition, with no original plasterwork/ joinery surviving. The original floor was replaced with a concrete floor. The stair hall was infilled, and

stair replaced. An early 20<sup>th</sup> century vestibule constructed as a single storey extension off the entrance lobby mirroring that of the link building to the Finlay Wing, has a decorative stucco ceiling, panelling and stained-glass. This connects with an original reception room by way of a large opening above reception desk height, now sporting an electric shutter. The internal view of the original entrance lobby is unremarkable, with the fanlight only surviving. Rear connections were enlarged to link with the rear extension block.

On the first floor, rooms to the north have survived in their original configuration but have been either amalgamated or compartmentalised. A corridor has been constructed to the rear connecting divided rear rooms. The infilled entrance hall accesses the southern extension, with a curved stair leading to rooms at a higher level.

The second-floor level was added in the late 19<sup>th</sup> century. It is similar in composition to the first-floor level, albeit with an interesting plant room cutting through the (later) roof incorporated in a former room to the rear of the stair hall. Rooms to the north have been amalgamated. All rooms are suffering some form of water ingress due to significant roof breaches.

The roof and chimneys are not original and do not possess features of significance.

The property is in poor condition, with extensive roof breaches causing significant decay internally, extending from 2<sup>nd</sup> floor level down through the building. The house's original composition has been modified beyond recognition, with irreversible changes permanently eroding its character.

#### 7.3.12.1.2 Assessment of significance

The original Milltown Park House has been modified beyond recognition in its extension to the south, east and north, with significant alterations internally. Regrettably, its significance is eroded irreversibly.

The building is not included on the Record of Protected Structures, nor is it included in the NIAH.

Notwithstanding its exclusion from the RPS/NIAH, it merits thorough assessment. Paragraph 2.5.7 of the *Architectural Heritage Protection Guidelines for Planning Authorities* lists five qualities that permit the attribution of special architectural interest characteristics to a structure or part of a structure:

<b>Quality</b>	<b>Attribution</b>
<i>A generally agreed exemplar of good quality architectural design.</i>	On construction, the house may have been considered an exemplar of its time, however, its current architectural composition cannot be deemed to uphold design ethics representative of what would comprise an exemplar.
<i>The work of a known and distinguished architect, engineer, designer or craftsman</i>	No notable designers were involved in the design or construction of the house or its subsequent extensive alterations. It is possible that architect Charles Powell was involved in some of the alterations post 1915, but his intervention is not of notable significance.

<i>An exemplar of a building type, planform, style or styles of any period but also the harmonious interrelationship of differing styles within one structure</i>	The architectural significance of the house has been reduced significantly on account of its many interventions. Its vestibule, constructed to compliment the functioning of the Finlay Wing and provide a reception desk for visitors, originally intended as a private chapel, is of interest insofar as it represents a craft not evident elsewhere in this building.
<i>A structure which makes a positive contribution to its setting, such as a streetscape or a group of structures in an urban area, or the landscape in a rural area</i>	The house has been extended to three sides and is engulfed to the south and north by later abutting structures. Its original setting is removed, and its new setting is regrettably one of architectural confusion.
<i>A structure with an interior that is well designed, rich in decoration, complex or spatially pleasing.</i>	No aspect of the house's interior is well designed. Its most significant feature comprises a small vestibule, a later extension, which presents brief architectural respite but is inherently connected to a lesser structure and would not survive on its own merit.

### 7.3.12.1.3 Summation

The early origins of this building are believed to date from the late 18<sup>th</sup> century. Regrettably, the original building has been much modified, with loss of legible 18<sup>th</sup> century composition at all levels of the accommodation. The more invasive interventions carried out previously are not considered reversible. It is therefore concluded that the building's significance is undermined, permanently. In the event that permission is granted for proposed demolition of the structure, a detailed chronology of fabric is recommended at archaeological investigation stage, when the building is vacated and opening up works can be safely carried out. A final building and fabric inventory can then be submitted to the architectural archive by way of record.

### 7.3.12.2 B) Milltown Park House (MPH) rear extension (c1860-1933)

*Please refer to Appendix 7.3 for a more detailed account and appraisal of the building fabric.*

#### 7.3.12.2.1 General characteristics

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

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

The extension is much modified internally. It comprises a corridor with cellular rooms to the south and either side in its rear wing on all five levels. Its rear wing, culminating its western elevation, expands to form an H-shape corresponding with the form of Milltown Park House, and houses sanitary facilities and stores.



The basement level accommodation connects with that of Milltown Park House, and benefits from a light-well to its perimeter. The accommodation is cellular, either side of a central corridor, with the exception of a room, below the original domestic Chapel, which has good timber panelling to chair rail level. The rear south-western corner connects with a stair leading to a link building connecting with the Community House (outside the ownership of the applicant), a section of which is intended to be removed as part of the proposed development.



***Plate 7.3.17: The former domestic Chapel, subsequently repurposed as a reading room, is embedded within the rear extension, Building B.***



***Plate 7.3.18: The rear, west elevation of the rear extension, with two storeys over basement brick link to the Community House, the visible section in this image of which will be demolished as part of the proposed development***

The entrance level accommodation is accessed from the rear hall of Milltown Park House. The entrance level accommodated a range of lecture rooms with larger function rooms either side of the central corridor to the west, housed in the wing culminating the extension. The interior is simply treated, with modest plasterwork, joinery and chimneypieces (where present).

Rooms of equal size are positioned either side of a central corridor in the rear wing, with the central section housing a 'domestic chapel' accessed from a short flight of steps within the circulation route, which comprised a double height volume with interesting arch headed vaulted windows. This floor is accessed through an original rear bedroom within Milltown Park House, in the widening of an original window opening.

The property is in poor condition, with extensive roof breaches causing significant decay internally, extending from 2nd floor level down through the building.



### 7.3.12.2.2 Assessment of significance

The extension is not included on the Record of Protected Structures, nor is it included in the NIAH. There is an absence of records in relation to its provision in the first instance, outside the Jesuit community own archives.

Paragraph 2.5.7 of the *Architectural Heritage Protection Guidelines for Planning Authorities* lists five qualities that permit the attribution of special architectural interest characteristics to a structure or part of a structure:

<b>Quality</b>	<b>Attribution</b>
<i>A generally agreed exemplar of good quality architectural design</i>	The extension is of interest but has been undermined with later interventions.
<i>The work of a known and distinguished architect, engineer, designer or craftsman</i>	No notable designers were involved in the early phases design or construction of this wing. Architect Charles Powell oversaw the vertical extension to the central section in 1932, but his intervention is not of notable significance.
<i>An exemplar of a building type, planform, style or styles of any period but also the harmonious interrelationship of differing styles within one structure</i>	The extension provides a good built example of its origin and type, but regrettably has been undermined by its extensions and by enclosing buildings with its architectural composition consequentially eroded.
<i>A structure which makes a positive contribution to its setting, such as a streetscape or a group of structures in an urban area, or the landscape in a rural area</i>	The building's original setting to the north, south and west has been dramatically altered in subsequent expansion of accommodation. Its setting to the east was originally merged with Milltown Park House and remains unchanged.
<i>A structure with an interior that is well designed, rich in decoration, complex or spatially pleasing</i>	The interior is logical, functional, but absent of decorative detail.

### 7.3.12.2.3 Summation on rear extension

The multi-layered extension to the rear of Milltown Park House was a substantial structure of its time. Care has been taken to stitch the various later additions together to create a greater whole. The building is interesting in how it treated the institutional function as reflected in use of materials that would be durable and maintainable. The larger communal spaces are also of interest in how they would have connected, prior to construction of later buildings, with the external landscape.

Setting aside elements of interest, it is maintained that the building is intrinsically connected with its original function as an institution and does not lend itself easily to alteration to another use. As a non-protected structure, adaptive re-use would essentially remove the limited architectural character internally. As a consequence of the permanent removal of function, together with a view that on balance, it does not possess the range of characteristics meriting retention, its demolition is inevitable.

#### **7.3.12.2.4 Summation on red brick link building**

The Community House for the Jesuit Community comprises a mid- 20th century structure of some architectural interest to the southwest of the Milltown Park House building range (Building B). On the western boundary of the site, a single storey over basement link connects the latter grouping with the Community House, and it is this structure that is scheduled for demolition to accommodate the provision of a boundary wall.

The flat roofed link structure is faced with red brick, with arched windows onto a private garden. Its northern elevation is blank and internally bears no decorative features. It is determined that the link structure does not possess particular architectural interest.

The red brick building was constructed c1955, by architect Raymond Kavanagh and was connected abruptly to the west gable of Building B to facilitate the Jesuit order to circulate internally between their vast building range. The proposed removal of the bay in closest proximity to Building B is required to allow the two entities, which are now in separate ownership, to function independently.

The red brick building remaining within the Jesuit owned lands would continue to be operated by the Jesuits, with independent access off Milltown Road. Care has been taken in the execution of the building, specifically with regard to the detailing of the round-headed windows, but the structure is not of architectural significance and its proposed demolition will have no impact in terms of architectural heritage.

The proposed application lands within the former Milltown Park Demesne are separate in origin and function to Gonzaga College, which is positioned within the former Sandfort Demesne.



**Plate 7.3.19: The Link building and its abutting connection with the rear extension to Milltown Park House**



**Plate 7.3.20: Flat roof over link building, and its connection with the Jesuit Community Building**

### 7.3.12.3 (E) The Finlay Wing (c1905/1950)

*Please refer to Appendix 7.3 for a more detailed account and appraisal of the building fabric.*

#### 7.3.12.3.1 General characteristics

The external character of the Finlay Wing as existing comprises its reconstruction following a fire in 1949, where a four storey over basement building was altered as a single volume building. Externally, the building is sparse and reflective of the budget-driven economy of mid-20<sup>th</sup> century.

The basement is simply arranged with cellular accommodation either side of a central corridor. Architecturally, the basement is unremarkable; with its most significant feature comprising metal framed windows and carefully expressed services.

The entrance level accommodation comprises a single volume hall, with expressed pilasters and ceiling down stands. It has oak parquet flooring laid in a herringbone pattern, expressed stuccowork, central sliding screen system and leaded windows. The space is divided into two with an innovative sliding door system.

The building is unique in the complex in that whilst it is connected with Milltown Park House as its primary entrance, it has independent access to the east in an expressed porch and lobby. The building is much altered from its original form.



Plate 7.3.21: The front elevation of the Finlay Wing as viewed from the south

#### 7.3.12.3.2 Assessment of significance

The building is not included on the Record of Protected Structures, nor is it included in the NIAH.

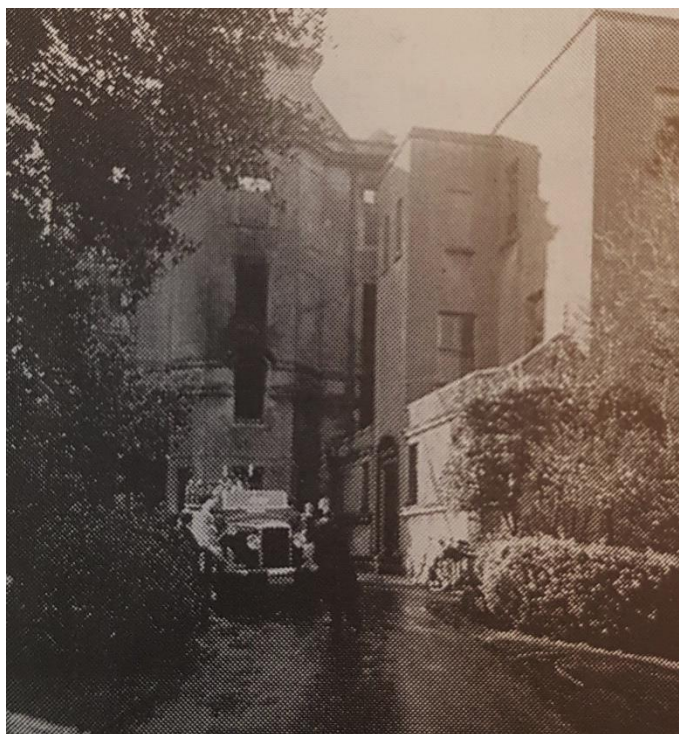
Paragraph 2.5.7 of the *Architectural Heritage Protection Guidelines for Planning Authorities* lists five qualities that permit the attribution of special architectural interest characteristics to a structure or part of a structure, which are considered for the Finlay Wing as follows:

<b>Quality</b>	<b>Attribution</b>
<i>A generally agreed exemplar of good quality architectural design.</i>	The building is of quality, but not to the extent where it is considered an exemplar. Its reconstruction, following a fire, as a single storey over basement building is much altered from its original intended design.
<i>The work of a known and distinguished architect, engineer, designer or craftsman</i>	The building was not designed by an architect of distinction.
<i>An exemplar of a building type, planform, style or styles of any period but also the harmonious interrelationship of differing styles within one structure</i>	The building is not of a form that would serve it as an exemplar.
<i>A structure which makes a positive contribution to its setting, such as a streetscape or a group of structures in an urban area, or the landscape in a rural area</i>	The building makes a positive contribution to its setting, in bridging the greater height and scale of other buildings in the grouping, as visible from Milltown Road.
<i>A structure with an interior that is well designed, rich in decoration, complex or spatially pleasing</i>	The interior is pleasing, but commonplace.

### **7.3.12.3.3 Summation**

The building as originally configured appeared to comprise a fine architectural set piece. And whilst its entrance level space is interesting, its extensive damage following a fire and ensuing repair as a truncated version, impacts its architectural significance.





**Plate 7.3.22:** *The fire damaged exterior of the Finlay Wing, indicating its original height of three storey over basement with pitched roof over.*



**Plate 7.3.23:** *Present day connection of the truncated Finlay Wing with Milltown Park House*

#### **7.3.12.4(F) The Archive (c.1938)**

*Please refer to Appendix 7.3 for a more detailed account and appraisal of the building fabric.*

##### **7.3.12.4.1 General characteristics**

The archive building has a modest exterior, comprising a simply rendered concrete block building with Art Deco characteristics. Its external composition is representative of wartime Ireland where materials and labour were in sparse supply. Fenestration comprises horizontal metal frames in vertical bands in rhythm puncturing an otherwise solid, simply cast façade. Each corner has a raised parapet and contrasting window treatment, with recessed plat bands within an elongated cut. Its lower-level link building connecting with the Milltown Park House rear extension block, defers to its parent form.

The building's interior reflects its function as an archive. A quadrangle generated by a pressed copper-clad structure encircling at three levels an apse ended lantern roof light, comprises book shelving aligned with the structure to create bays each having their own window. Guarding in steel uprights with polished oak handrail encloses the bow-ended void.

A mundane single storey flat roof extension has been constructed adjoining the south gable.

The building does not benefit from any independent external access. Its singular point of entry is internally, via the Milltown Park Extension, which involves a series of level changes. The absence of a relationship with its external environment, and dependency on an uncomfortable internal connection with Milltown Park House is a significant factor in assessing its significance.



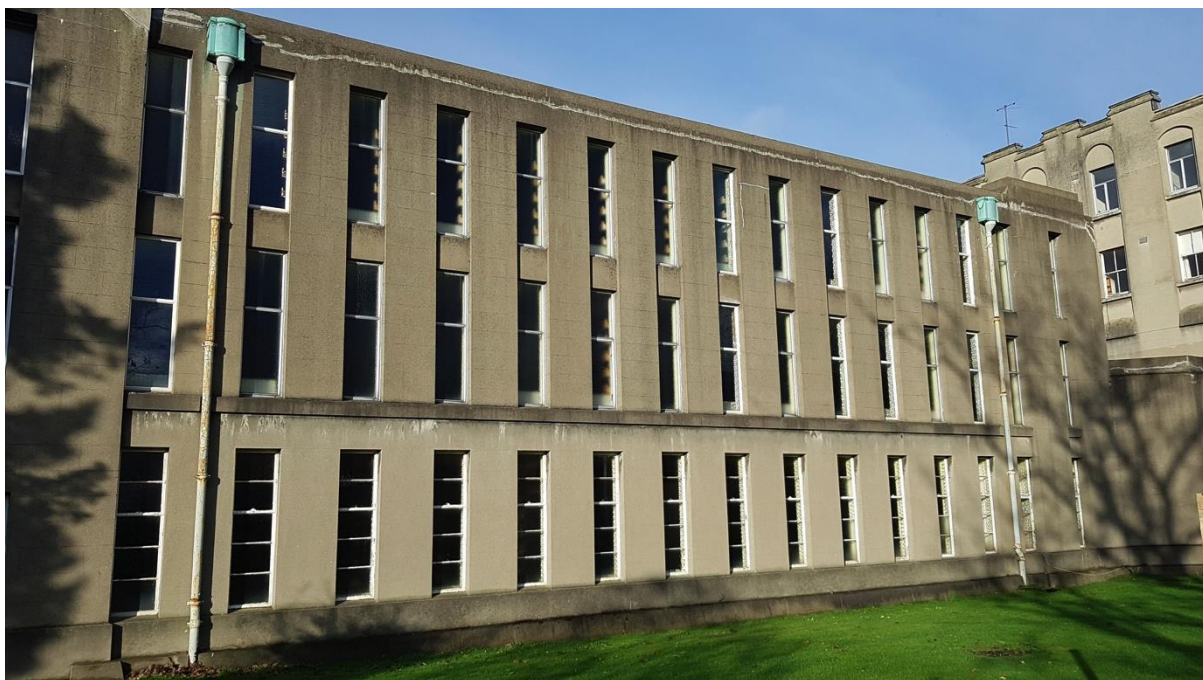


Plate 7.3.24: South-east elevation.

#### 7.3.12.4.2 Assessment of significance

The building is not included on the Record of Protected Structures, nor is it included in the NIAH.

Paragraph 2.5.7 of the *Architectural Heritage Protection Guidelines for Planning Authorities* lists five qualities that permit the attribution of special architectural interest characteristics to a structure or part of a structure, which will be applied to the Archive as follows:

Table 7.3.5: Attribution of special architectural interest characteristics	
Quality	Attribution
<i>A generally agreed exemplar of good quality architectural design</i>	The building is a good example of its era of construction.
<i>The work of a known and distinguished architect, engineer, designer or craftsman</i>	The building was designed by architect Charles B. Powell, who was engaged by the Jesuit order to undertake several phases of building work in the Milltown grouping, from 1915 onwards. His work was primarily confined to properties connected to the Jesuits including, most notably, the Gothic revival hall of residence, Hatch Hall, in 1912.
<i>An exemplar of a building type, planform, style or styles of any period but also the harmonious interrelationship of differing styles within one structure</i>	The building is a good example of its era of construction.
<i>A structure which makes a positive contribution to its setting, such as a streetscape or a group of structures in an urban area, or the landscape in a rural area</i>	The building is introverted and whilst it does not connect internally with its landscape, the relatively inactive external form is benign within its setting.

<i>A structure with an interior that is well designed, rich in decoration, complex or spatially pleasing</i>	The building's interior is a good example of its era of construction.
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#### 7.3.12.4.3 Summation

The building is a representation of good design practice of its era and remains intact to the present day.

Whilst of interest, its function is wholly connected with its form. A study carried out by OMP examines potential re-use and concludes that its re-use for any purpose other than an archive would effectively remove its key features, such as stairs, galleries, linings and fittings. With the loss of these elements, and expression of the original external form only, the building's significance would be irreversibly compromised.

### 7.3.13 Buildings proposed for retention and reuse

#### 7.3.13.1(C) Tabor House (c 1875)

Please refer to Appendix 7.3 for a more detailed account and appraisal of the building fabric.

##### 7.3.13.1.1 General characteristics

Tabor House comprises a three storey over basement building, and possesses a strong exterior of rusticated granite, with sweeping entrance steps centrally positioned to the east. The west elevation is a continuance of the style of the east, with a central bowed stair bay. The building has a slated pitched roof, timber sash windows and timber panelled doors. The building is simply designed internally with generous cellular rooms positioned either side of a central corridor. Plasterwork is simply treated, with no cornices. Joinery is simply and robustly treated to reflect its institutional use as a dormitory building. Some rooms are amalgamated to create lecture rooms.

The basement level comprises cellular rooms either side of a central corridor. The basement's generous floor to ceiling height benefits the past use of this floor as bedrooms. Some rooms are amalgamated.

The entrance level comprises cellular rooms either side of a central corridor. Some rooms have chimneypieces. All rooms have simple treatments. Fire separation is provided by way of a set of door screens separating the central stair from corridors, a practice repeated at upper levels.

Both the 1<sup>st</sup> floor and 2<sup>nd</sup> floor levels have an identical cellular layout, following the symmetry of lower levels. Most chimneypieces have been removed and decorative detailing is minimal.

##### 7.3.13.1.2 Assessment of significance

The building is not included on the Record of Protected Structures, nor is it included in the NIAH.

Paragraph 2.5.7 of the *Architectural Heritage Protection Guidelines for Planning Authorities* lists five qualities that permit the attribution of special architectural interest characteristics to a structure or part of a structure:

Table 7.3.6 Attribution of special architectural interest characteristics	
Quality	Attribution
<i>A generally agreed exemplar of good quality architectural design</i>	The building is a good example of institutional 19th century architecture.
<i>The work of a known and distinguished architect, engineer, designer or craftsman</i>	John Butler Architect
<i>An exemplar of a building type, planform, style or styles of any period but also the harmonious interrelationship of differing styles within one structure</i>	The building is typical of its era of construction but is set apart by the quality of its exterior. It is simply detailed internally, with its exterior found to comprise an exemplar of its period.
<i>A structure which makes a positive contribution to its setting, such as a streetscape or a group of structures in an urban area, or the landscape in a rural area</i>	The structure contributes to its parkland setting and enriches the architectural character of the public realm as visible from Milltown Road.
<i>A structure with an interior that is well designed, rich in decoration, complex or spatially pleasing</i>	The building is a well-designed example of its era.



Plate 7.3.25: East (front) elevation of Tabor House



**Plate 7.3.26:** West (rear) elevation of Tabor House, in context with the Chapel

#### *7.3.13.1.3 Summation*

Tabor House, whilst clearly institutional in origin, has the benefit of a singularly strong external form, which follows through to a rational internal form. As a consequence, its re-use is possible. Materially, the building is simply treated with little adornment. What survives intact, such as the stair from entrance to upper levels, windows and some joinery - can all be maintained in its future re-imagining as a residential building.



### 7.3.13.2 (D) The Chapel (c.1895)

Please refer to Appendix 7.3 for a more detailed account and appraisal of the building fabric.

#### 7.3.13.2.1 General characteristics

The chapel grouping, comprising a sacristy, vestry and gallery, is an exemplar of its era. Its external form is strong, and legible on the north-west elevation with copper clad bow ends and elegant fenestration. Much of the exterior of the building is largely concealed by taller structures to the east (Tabor House link building); north (Tabor House) and south (Milltown Park rear extension).



**Plates 7.3.27 & 7.3.28: The rear elevation of the Chapel, and the front elevation of the Tabor House Link with gable of Chapel complete with rose window over.**

The interior is clad with polished marble wall and floor linings within a grid composition. Its expressed roof structure is a continuance of the grid. Whilst all pews have been removed the interior reflects its ecclesial function with a number of stained-glass windows. A section of mosaic floor was uncovered under the raised altar, indicating the later origin of the altar composition. The extent and condition of the concealed mosaic piece is unknown.

A basement exists under the chapel, at garden level. It consists of cellular accommodation either side of a central corridor. Entry level is accessed up a short flight of steps from the corridor of the Milltown Park rear extension block, leading to the Tabor House link building. The volume of the chapel is remarkable, with extensive gilding, carved stonework and stained-glass panels of the highest quality by Joshua Clarke (father of Harry Clarke) and Mayor of Munich. The gallery is accessed from an obscure link structure to the south of the first floor of Tabor House.

Pews, organ and stepped accommodation within the gallery survive intact.

The slated roof with copper trimming and gutters is in good condition generally.

#### 7.3.13.2.2 Assessment of significance

The building is not included on the Record of Protected Structures, nor is it included in the NIAH.



Paragraph 2.5.7 of the *Architectural Heritage Protection Guidelines for Planning Authorities* lists five qualities that permit the attribution of special architectural interest characteristics to a structure or part of a structure. The chapel building grouping is therefore described as follows:

<b>Quality</b>	<b>Attribution</b>
<i>A generally agreed exemplar of good quality architectural design.</i>	The largely top lit building bears no relationship internally with its context, having stained glass windows. However, its dramatic interior is enhanced by its detachment from its wider, congested context as a later structure fitted within a tight residual space between two larger buildings: the Milltown Park rear extension block and Tabor House. Its rear, west elevation is most prominent within the parkland, and immediately identifies the building as a church.
<i>The work of a known and distinguished architect, engineer, designer or craftsman</i>	<p>The Chapel was designed by architect William Hague, of Dawson Street, Dublin, a well-known 19<sup>th</sup>-century ecclesiastical Irish architect responsible for many churches, particularly around Monaghan and Cavan where he was initially based. Notable works include Sligo Town Hall (1864-72), which was executed in an Italianate Palazzo style.</p> <p>Artist Harry Clarke is responsible for the canvases depicting angels (c.1927) fixed to the piers between the windows in the apse of the Chapel.</p> <p>Archival records indicate that Harry Clarke was also commissioned to paint the ceiling blue with golden stars but unfortunately this was painted over in the 1970s.</p> <p>A number of stained windows are by Joshua Clarke, Harry Clarke's father.</p>
<i>An exemplar of a building type, planform, style or styles of any period but also the harmonious interrelationship of differing styles within one structure</i>	The building is typical of its era of construction but is set apart by the quality of its materials and artistic elements.
<i>A structure which makes a positive contribution to its setting, such as a streetscape or a group of structures in an urban area, or the landscape in a rural area</i>	The structure contributes to its parkland setting.
<i>A structure with an interior that is well designed, rich in decoration, complex or spatially pleasing</i>	The building's interior is an exemplar of its era that endures to the present day.

### **7.3.13.2.3 Summation**

The chapel was constructed to fit neatly in a tight space between Tabor House and the rear extension to Milltown Park House. However, as a set piece it is found to have formed a viable

architectural connection with Tabor House, that is envisaged as having the capacity to endure in the detachment of these forms from the wider grouping.

The interior of both levels of the Chapel can be purposefully re-used as communal amenity space, whilst retaining its spatial and decorative character.

### **7.3.13.3 Entrance gate and sections of boundary wall**

The gate piers and flanking walls at the entrance on Sandford Road are comprised of granite ashlar with a central vehicular gate and a pair of pedestrian gates adorned with arrows, most likely a reference to the Jesuit missionaries' historic connection to the Native Americans.

East of the entrance, the boundary wall, which extends the length of Milltown Road, is comprised a mix of cement render and granite random rubble with rounded capping. A section of wall at the junction of Milltown and Sandford Roads was replaced with cement rendered blockwork in the 20<sup>th</sup> century.



**Plate 7.3.29: Gated entrance on Sandford Road**





Plate 7.3.30: View of entrance gates looking south from Belmont Avenue



Plate 7.3.31: Boundary wall along Milltown Road





**Plate 7.3.32: Replacement section of boundary wall at junction of Milltown and Sandford Roads**



**Plate 7.3.33: Section of boundary wall at junction of Milltown and Sandford Roads, due northwest which was replaced with blockwork in past realignment of the junction**

#### **7.3.14 Brief summary of the institutional profile of the site**

As cited in section 7.3.10 above, the neighbouring Sandfort (now Sandford) Demesne and its two houses was acquired by the Community circa 1949 to alleviate congestion in the

community building range and expand interests in the vicinity. The Jesuit Community building range emerged thereafter, differing architecturally and compositionally from the Milltown Park building range. In time, Gonzaga College was founded within the Sandfort Demesne, orientated away from and separated from Milltown Park by the Community Building range.

The community building range developed in the 1950's is positioned to the rear of the proposed Block B and connected to it by a link building. The same community building range straddles the original boundary line between the two demesnes. However, rather than perforate it, it essentially extends the Milltown Park demesne to the west, as enclosed by a changed boundary condition.

As a consequence, notwithstanding shared ownership, the demesnes of Milltown Park and Sandfort were not amalgamated with boundaries between the two remaining separate and linked by gated entrances. The distinctive land character of both entities has endured; Milltown Park as a large-scale institution and Sandfort as two villas in a sylvan setting having walled gardens and parkland.

The perceived separation now arising as a consequence of the sale of the subject lands to the applicant, will therefore essentially reinstate the original boundary line between the two demesnes.



**Plate 7.3.34:** Community building range, with the low-level link building centrally positioned between it and the subject institutional building range within the applicant lands





**Plate 7.3.35:** Entrance to the Community building range from Milltown Road, with the subject institutional building range within the with the application site visible beyond the corner of same



**Plate 7.3.36:** The community garden, with the subject institutional building range within the applicant lands visible beyond same



**Plate 7.3.37:** The Community group, with fenced boundary between it and Gonzaga College lands



**Plate 7.3.38: The Community group, with the subject range within the application site visible beyond**





Figure 7.3.39: Detail of deed map, dating from 1903, demonstrating the sequence of land acquisition by the Community, prior to the purchase of part of the Sandfort Demesne- refer to larger scale map in Figure 7.3.9 above.

#### 7.4 Physical Characteristics of the Proposed Development

Institutional activity on the site ceased permanently in 2015 and the property was vacated by the Jesuit order in 2019.

It is proposed to construct a residential development on the site. To give effect to the new development it is proposed to demolish all existing buildings fabric within the application boundary, with the exception of Tabor House and the Chapel. The new development encloses the retained structures to the north and south and is placed within a renewed and carefully considered parkland setting.

The most evident characteristic of what is proposed is in the altering of walled boundaries with Sandford and Milltown Roads, which will become more permeable to encourage interaction with the public realm. A second key feature is the accessibility of the parkland to the public with a new public park provided along the eastern boundary of the site.

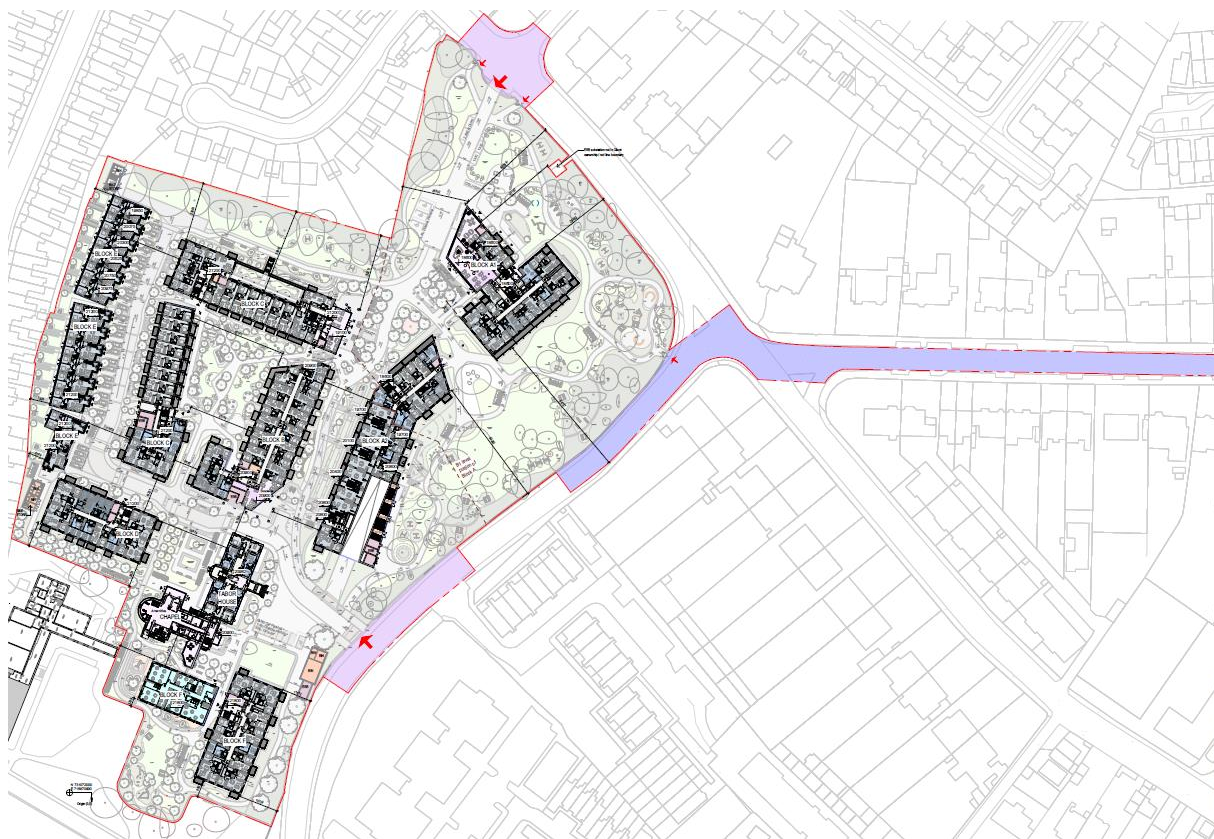


Figure 7.4.1: Site plan of the proposed development, with the retained Chapel and Tabor House at the centre of the development

## 7.5 Relevant Environmental Factors, Likely Impact of the Development And Accompanying Mitigation Measures

*This section provides a description of potential impacts that the proposed development may present for architectural heritage in its vicinity. Potential impacts are assessed with regard to the development's receiving environment and its characteristics while also referring to the duration of impacts and categorises them, where possible, as permanent, temporary; positive, negative or neutral.*

### 7.5.1 Overview of potential impacts

In this section, ranges of impacts potentially associated with the development have been reviewed, with opinions informed by a detailed response to mitigating measures. The potential for impacts envisaged as arising from the proposed development are expanded in texts below.

### 7.5.2 Potential impact for existing structures within the site

#### 7.5.2.1 Demolition

The demolition of Milltown Park House and its rear extension, the Finlay Wing and the Archive is proposed to facilitate the redevelopment of the remaining buildings and the surrounding lands on the subject site. A section of a linking corridor, which connects the west gable of the rear extension to the red brick building, will also be removed to separate the two entities and facilitate independent use.

An architectural assessment of the building range, above, finds that buildings subject to demolition do not possess significance meriting inclusion on the Record of Protected Structures and consequential retention by virtue of protection.

Notwithstanding absence of significance, the enclosed, introverted and private historic building group has contributed to the character of its environs as visible in places above impermeable boundary walls.

The removal of part of it will present a direct permanent impact insofar as replacement structures will alter the character of the receiving environment. The impact is considered neutral, given the proposed replacement of the building range.

Indirect, temporary and adverse impacts are presented in the physical removal of buildings and disruption arising therefrom as addressed in the Preliminary Construction Management Plan prepared by DBFL accompanying this submission.

As part of the process to determine an appropriate conservation strategy, a feasibility study was prepared by OMP architects to determine the viability of retaining and repurposing each of the existing buildings within the site. Conclusions arising from that study may be summarised as follows.

<b>Milltown Park House (A) and Rear extension to Milltown Park House (B)</b>	<p>As a consequence of previous modifications, internal circulation within the two structures is confused and involves the negotiation of multiple level changes.</p> <p>When the feasibility of adapting the existing building for residential use was considered, it was found that the majority of the units would be single aspect with integration of kitchens, bathrooms, services and enclosing partitions anticipated as having a major impact on the structure. The rear extension was constructed in multiple phases and the upper floors were constructed using a concrete frame. It is anticipated that significant works would be required to adapt the structure to accommodate the new interventions.</p> <p>New windows would be required and external walls would require thermal upgrading.</p>
	<p><b>Architectural Heritage considerations</b></p> <p>These buildings are considered together as they are presently interconnected on all levels. The building fabric and interior circulation are interwoven to such an extent that the removal of one or other of the structures would prevent the proper functioning of the surviving structure.</p> <p>There is little surviving by way or original fabric in the original dwelling. The house has been modified on multiple occasions and it would be impossible to reinstate it either in its original form, which would require a significant speculation, or to repurpose it as a viable structure given its institutional characteristics.</p>
<b>Tabor House (C)</b>	<p>The existing floor to ceiling heights range from 2.9m on the lower ground to 3.6m on the upper level and therefore could accommodate the introduction and distribution of services, whilst maintaining an acceptable clear height.</p>



	<p>The potential impact of services on the building fabric to serve adaptive reuse could be reduced by stacking of services, which is achievable due to the repetitive nature of the floor layouts.</p> <p>The existing primary stairs may require alteration to comply with statutory regulations, but the width of the existing flights is acceptable. The secondary service stairs are not compliant with current regulations and any proposed reuse of the building would likely require significant modifications.</p> <p>A new lift will be required to facilitate accessible access internally.</p> <p>External walls would require thermal upgrade.</p> <p>Windows and interior doors may require upgrading to satisfy current regulations. The size of the window and position in the façade would be compatible with a residential or hotel use.</p> <p>The existing stepped approach to the principal entrance will impede accessible access without alteration.</p> <p>The provision of external balconies to provide private open space for residential use would not be compatible with the architectural character of the building.</p> <p><b>Architectural Heritage considerations</b> The study has demonstrated that the structure could be adapted for alternative use. Whilst the structure is not in itself of major architectural significance, it does contribute to the character of the site. The challenges presented in adaptation are not considered to be insurmountable and sensitive modifications could be introduced to satisfactorily address these issues, without significantly impacting the character of the structure.</p>
<b>Chapel (D)</b>	<p>By its nature, the Chapel has a particular form and would not be suitable for subdivision into multiple spaces.</p> <p>The existing gallery could be extended to create additional floor space.</p> <p>The stained-glass windows reduce the daylight into the space and the iconography are not considered appropriate for secular use and will be carefully removed and relocated appropriately.</p> <p><b>Architectural Heritage considerations</b> Notwithstanding the challenges presented by adaptation, it is considered that this structure contributes to the character of the site and furthermore as it is relatively detached from the adjoining structures it may facilitate its retention, even in the event of partial demolition of other structures on the site. The demolition of structures which conceal it will enhance its viability as a detached structure.</p> <p>Consideration should be given to retain the central space with its fine vaulted ceiling as a single volume. It is accepted that the religious iconography may not be appropriate in an alternative setting, and this aspect of the conversion will require further consideration.</p>

<b>Finlay Wing (E)</b>	<p>Whilst the Finlay Wing, unique to the complex, has its own entrance to the east, its principal access is via Milltown Park House, with multiple level changes internally presenting difficulties with regard to accessibility and fire safety.</p> <p>Any alternative use would arise in different layouts on each floor to suit the building's existing configuration. This would complicate the installation and distribution of mechanical and electrical services to the detriment of the building fabric.</p> <p>Access to alternative use would necessitate a new external entrance to independently serve each of the two levels.</p> <p>Potential subdivision of the hall on the upper floor level would have a major impact on its architectural character.</p> <p>Windows and external walls are likely to require thermal upgrading.</p> <p><b>Architectural Heritage considerations</b> The architectural integrity of this structure has previously been compromised by the loss (due to historic fire damage in 1949) of the upper floors. In terms of architectural heritage, the most significant surviving element is the hall on the upper ground floor, which is appreciable only if repurposed in its current form as a singular volume. If it were to be subdivided into multiple spaces, there would be little by way of surviving fabric to justify its retention in architectural heritage terms.</p>
<b>Archive (F)</b>	<p>Much of the character of the building is derived from the layout of the archive stacks themselves, which dictate the structural grid and the positioning of the windows on all facades. Any proposed adaptive reuse of this structure will necessitate the removal of the stacks and detract from the existing architectural character of the interior space.</p> <p>The existing narrow windows were intentionally designed to light between the archive stacks and when combined with ambient light from the atrium to provide sufficient light for archival purposes. If the space around the central atrium were to be enclosed and separated from the atrium, the existing windows will provide low levels of daylighting, and the opening may need to be altered to meet desirable standards.</p> <p>The existing floor to ceilings heights range from 2.8m to 2.48m. If the building were repurposed, it will require additional services. Installation of required services will likely reduce the floor to ceiling heights below regulatory required standards.</p> <p>Proposals to infill the atrium were found to severely impact the character of the space.</p> <p>Installation of vertical service shafts will limit the usable floor area and adversely impact the character of the structure.</p>

	<p>The existing stairs within the building is not compliant with current regulations and will require modification or the introduction of a new accessible stairs within the building, which will further encroach on available floor area.</p>
	<p>The balustrade is not compliant with existing regulations and will require modification.</p>
	<p><b>Architectural Heritage considerations</b>  This building is of architectural significance and the care taken in crafting the interior is evident. However, as a consequence of the bespoke design to accommodate archives, it is considered that the adaptive reuse of the structure would severely undermine its architectural character, effectively negating the value of retaining it, in conservation terms.</p>

### *Mitigation*

The assessment of building significance combined with the potential impact and viability of adaptive reuse informed the proposed conservation strategy to selectively retain two of the existing structures.

It is considered that the selective demolition of Milltown Park House and its later rear extension, the Finlay Wing and the Archive is justifiable and that their removal will facilitate the successful adaptation and improved integration of the retained structures, Tabor House (C) and the Chapel (D) into the proposed redevelopment on the subject site.

The two structures proposed for retention will collectively serve to uphold the character of the site and retain a tangible link to its historic use and character.

Notwithstanding the lack of significance assigned to the individual buildings, the proposed part retention of the existing building range, will enable future interpretation of the site's historic character.

Material impacts arising from the proposed selective demolition strategy are not considered to constitute an impediment to demolition. The detailed surveys submitted with this application will provide a sufficient record to ensure that the historic evolution of the upstanding building range is chronicled. Future archaeological investigations will review the possibility of concealed or embedded building fabric, if existing.

In the event that permission is granted for proposed demolition of identified structures, a detailed chronology of fabric is recommended at archaeological investigation stage, when the buildings are vacated and opening up works can be safely carried out. A final building and fabric inventory can then be submitted to the architectural archive by way of record.

#### *7.5.2.2 Demolition of part of the red brick link to Jesuit owned lands*

The demolition of part of the red brick link building connecting the Jesuit community buildings with the development site, is proposed. The removal of the bay in closest proximity to Building B is required to allow the two entities, which are now in separate ownership, to function independently.

Care has been taken in the execution of the building, specifically with regard to the detailing of the round-headed windows, but the structure is not of architectural significance and its proposed demolition will have no impact in terms of architectural heritage.

The proposed works are intended to be carried out to maintain a four-bay section of the structure intact.



**Plate 7.5.1:** The red-brick link building (c.1955) connects to the west gable of the rear extension (Building B)

### **Mitigation**

It is recommended that all the building range's exteriors, interiors and settings be thoroughly recorded. All records will be of a quality meriting inclusion in the Irish Architectural Archives.

#### **7.5.2.3 Potential impact of detachment of and modifications to retained buildings**

All the buildings within the grouping are interconnected to varying extents and the selective retention of some structures and demolition of others will necessitate modification to interior circulation and external approach to replace interrupted routes. The physical impact of these consequential interventions is described in Section 7.9. below.

The presentation of the retained structures within a renewed setting has been carefully considered by the design team and is also described in Section 7.9.

The Landscape and Visual Impact Assessment, Chapter 9 of the wider EIAR, states:

*'The proposed development would retain Tabor House and the Chapel - the two most valuable existing architectural features of the site - as part of the cluster of buildings. Their condition, and the character and condition of their setting would be improved by the development, with both buildings opened up to view from Milltown Road.'*

*As a remnant of the Milltown Park demesne the woodland belt inside the Sandford Road and Milltown Road boundaries is also a cultural heritage feature. While the proposed development includes the removal of a large number of trees from the woodland belt, the majority of specimens in good condition would be retained (and supplemented by new planting) - so that the woodland belt remains as a distinct landscape feature of the site. This*



*too would benefit from increased visual exposure to the public realm resulting from the proposed replacement/modification of the tall boundary wall with a low wall and railing - allowing greater public appreciation of the woodland as a landscape/ cultural heritage feature.'*

On balance, the potential for positive impact is inherent in the rejuvenation of the site through the adaptation of existing building fabric of heritage interest and the provision of new buildings to secure a sustainable long-term use for the site.

### **Mitigation**

The careful management of the demolition process in the designed temporary protection of extant structures prior to the commencement of their permanent works will ensure that retained buildings are protected from damage, with no direct impacts envisaged. As described in Chapter 6, archaeological investigations will record evidence of earlier embedded structures, if found to exist beneath extant upstanding fabric.

New interventions consequential to the loss of physical connections to buildings, which are proposed to be demolished, will be measured and sympathetic to existing architecture.



**.1.:** Birds eye view of the Chapel and Tabor House in context with the proposed development, as extracted from Aerial Views, 3D Design Bureau





Figure 7.5.2.: CGI of Tabor House in context with the proposed Milltown Road entrance and development



Figure 7.5.3.: CGI of the proposed development with rear of Tabor House in context





Figure 7.5.4.: CGI of the proposed development with rear of Tabor House in context

#### *7.5.2.4 Potential impact of works to boundary walls onto Milltown and Sandford Roads*

The existing boundary wall onto Milltown and Sandford Roads is a mixture of harled rubble masonry and cement rendered concrete blockwork. Although it varies considerably in quality, the boundary wall contributes to the character of the surrounding streetscapes and its modification has the potential to alter this setting. It presents a tall, imposing feature within the urban environment, reflecting the private, introverted nature of the site's former institutional use, within a parkland shunning public access. In the site's proposed redevelopment for residential use, a greater extent of permeability to a public parkland is expected, with a range of interventions to the boundary now proposed.

The two existing 19<sup>th</sup> century gates; a vehicular entrance on Sandford Road and a metal pedestrian gate on Milltown Road will be unaffected by the proposal. One additional vehicular entrance will be introduced midway along the boundary on Milltown Road, with pedestrian entrances introduced at the junction of Milltown and Sandford Roads.

Intended works comprise the following:

- Creation of a new vehicular entrance off Milltown Road, perforating an original section of stone boundary wall
- Removal of a length of original stone boundary wall, extending from Milltown Road into an already replaced blockwork section at the junction with Sandford Road
- Creation of two new pedestrian gates either side of an entrance gate off Sandford Road
- General conservation and repair of friable masonry fabric



**Figure 7.5.5: Position of proposed entrances off Milltown and Sandford Roads, (Cameo&Partners)**

**7.5.2.4.1 Potential impact of the creation of a new vehicular entrance off Milltown Road, perforating an original section of stone boundary wall**

Whilst it is proposed to retain much of the rubble masonry wall to minimise impacting the existing streetscape, a section will be removed onto Milltown Road to accommodate a new vehicular entrance. The removal is considered necessary to generate access to the site as an alternative to that on Sandford Road.

**Mitigation**

Flanking sections will be protected during the removal stage and consolidated to ensure their long-term co-existence with new perforations.

Any proposed interventions will be executed using high-quality materials, in a palette to complement the muted tones of the existing wall.

The sylvan nature of the existing site will be protected in so far as possible and enhanced by further planting.

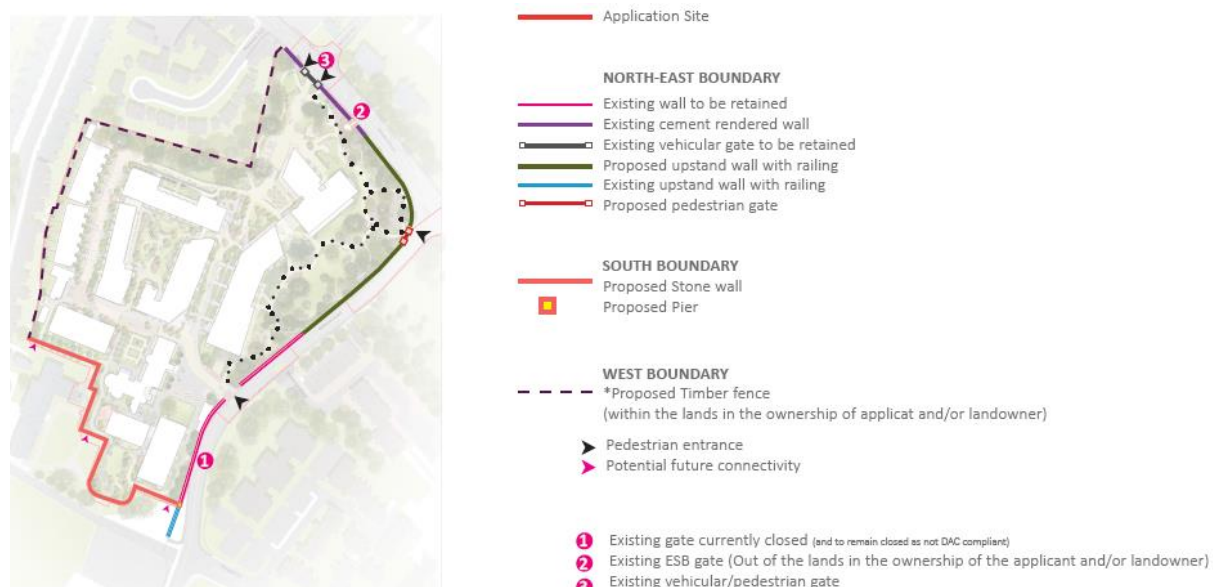


Figure 7.5.6: Boundary wall treatments (Cameo&Partners)



Figure 7.5.7: Existing stone boundary wall treatment onto Milltown Road, (Cameo&Partners)- denoting where a new vehicular opening is proposed

7.5.2.4.2. *Potential impact of the creation of the removal of a length of original stone boundary wall, extending from Milltown Road into an already replaced blockwork section at the junction with Sandford Road*

New openings to the northeast and north onto Sandford Road are required to improve permeability through the site. A section of early wall extending from Milltown Road, turning the corner onto Sandford Road is intended to be replaced. Whilst it is proposed to remove sections of the wall which have been previously modified and have no material character, it is also proposed to remove sections of early rubble masonry. This early section is noted for its dominance on to the character of the public realm of Milltown Road, which whilst reflecting the introverted nature of the site’s original character, now represents a potentially hostile barrier in the site’s efforts to engage with the residential character of the area.



The curved length of boundary wall extending from Milltown Road around its junction with Sanford Milltown Road, is of recent origin and comprised of cement render on a blockwork wall. The removal of this modern fabric building fabric, will have no physical impact in terms of architectural heritage.

It is proposed to generate a new, visually permeable boundary condition, embracing rather than shunning interaction with the public realm. Replacement sections of wall will comprise a base plinth of salvaged stonework open railings above, to introduce greater permeability through an otherwise introverted site.

The material of the proposed new boundary harmonises with the existing boundary wall.

### *Mitigation*

Flanking sections of retained, early masonry, will be protected during demolitions and consolidated to ensure their continuance as a characterful boundary onto Milltown Road.

#### EXISTING CONDITION



#### PROPOSAL



**Figure 7.5.8: Existing stone boundary wall treatment onto Milltown Road, extending to junction with Sanford Road (Cameo&Partners)- denoting where original sections of stone boundary wall will be removed and a visually permeable boundary treatment instated**





**Figure 7.5.9: Proposed boundary treatment at junction of Sanford and Milltown Road (Cameo & Partners)**

*7.5.2.4.3. Potential impact of the creation of two new pedestrian gates either side of an entrance gate off Sanford Road*

The Sanford Road entrance has endured to become a feature of the streetscape and serves as a testament to the social history and former institutional use of the site and its proposed restoration will have a positive impact.

Its two pedestrian gates, which are narrow by contemporary standards, do not facilitate accessible access. It is proposed to provide two supplementary pedestrian gates either side of the flanking walls to accommodate universal access without interfering with the composition of the gateway. Whilst proposed creation of new pedestrian openings has the potential to alter the immediate context of the entrance, the visual consistency of the existing composition will remain unchanged.

*Mitigation*

Modifications to the boundary wall adjoining the entrance will be sympathetic to the existing entrance in terms of scale and materiality to minimise the visual impact on the established streetscape.

PROPOSAL



**Figure 7.5.10: Existing stone boundary wall treatment onto Sanford Road, as extracted from Cameo&Partners report- denoting the creation of two new pedestrian openings either side of the original gated entrance**

#### 7.5.2.4.4. *Potential impact of the general conservation and repair of friable masonry fabric*

The proposed general repair and consolidation of retained masonry wall sections, in materials compatible with and respectful of traditional methodologies, will enhance the longevity of retained sections.

### 7.5.3 Potential impacts for the ACA

Section 6 of the Belmont Avenue/Mount Eden Road & Environs, Architectural Conservation Area Report Character Appraisal and Policy Framework states the ACA policy as:

*'To seek to preserve, protect and enhance the architectural quality, character and setting of the eighteenth, nineteenth and early twentieth century building characteristics within the Architectural Conservation Area (ACA) and to ensure that any changes complement and add to its character.'*

An extract of Policy CHC<sub>4</sub>, Chapter 11, Dublin City Councils Development Plan identifies further requirements.

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

Chapter 9, Landscape and Visual Impact Assessment of this EIAR, Table 9.9: Assessment of Potential Visual Effects predicts an impact for the ACA as being moderate to positive, on the basis of a low-medium magnitude of change, as follows:

*'Block A would protrude marginally above the tree line in summer and in winter it would be clearly visible, along with Block C deeper within the site – both buildings partially screened or filtered by the trees.*

*Due to the buildings' setback from the street, there would be no sense of dominance of the existing/ historic buildings in view.*

*At this proximity the architecture of Block A would be appreciable, specifically the articulation and three-dimensional quality of the facade and the quality of the materials.*

*The site would retain its park-like character despite the presence of the buildings (the open space and trees would lend the development a park-like character).*

*The character of the townscape/ view would be altered but not inappropriately given the location, and the overall composition of built form, vegetation and open space in the view would be pleasing.'*

Notwithstanding the position of the subject development site in proximity to the ACA's southern boundary at Belmont Avenue, the historic connection between Coldblow Lane (present day Belmont Avenue) and the existing entrance to the former Coldblow Farm (present day Milltown Park) is acknowledged.

In addition, the character of an entrance at this position as integral to the culmination of the ACA due south, is also acknowledged.

The existing sylvan character of the vista from the ACA is further acknowledged.



Accordingly, considerable effort has been made to retain the sylvan character of the boundary separating the development site from protected structures on Sandford Road and Clonskeagh Road, which, whilst outside the ACA, frame the character of Belmont Avenue.

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



Figure 7.5.11: Viewpoints for the LVIA



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

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

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



Figure 7.5.12: Viewpoint V4- existing



Figure 7.5.13: Viewpoint V4- proposed



Figure 7.5.14: Viewpoint V5- existing



Figure 7.5.15: Viewpoint V5- proposed

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

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

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

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



Figure 7.5.16: Proposed landscape masterplan



Plate 7.5.2: Aerial view of the mature corpse of trees inside the south eastern corner of the subject site facing north-east, in the direction of Sandford Road, which is intended to become a public park



### Mitigation

Potential impacts associated with the construction phase of the development will be considered by way of introducing a range of mitigating measures to protect existing site boundaries and mature trees.

On completion of the development, the sylvan screening that presently defines the architectural setting of protected structure in the vicinity of the subject site will be supplemented to overcome possible environmental changes arising from the construction phase of the development.

The Sandford Road entrance will be retained to minimise the visual impact on the southward views from the ACA.

#### 7.5.4 Potential impacts for protected structures in the vicinity of the development site

Table 7.3.1, in Section 7.3.9 above identifies all protected structures in the vicinity of the subject site.

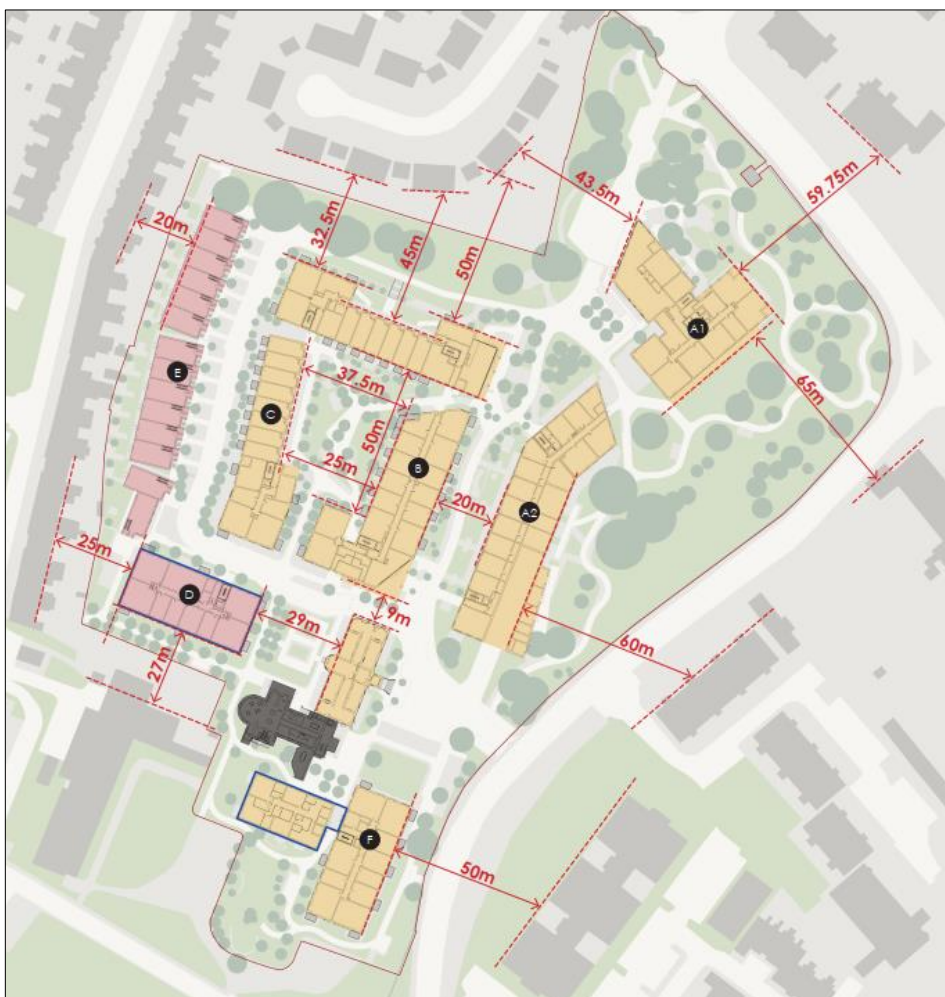


Figure 7.5.17: Distances from the proposed development to neighbouring structures as extracted from Section 3.4 of the OMP Masterplan and Architectural Design Statement



Figure 7.5.18: Viewpoint V8- existing



Figure 7.5.19: Viewpoint V8- proposed



Figure 7.5.20: Viewpoint V9- existing



Figure 7.5.21: Viewpoint V9- proposed

**Table 7.5.2: Schedule of Potential impacts on Protected Structures in immediate proximity to the applicant site**

RPS	Sandford Road	Potential impact / <i>Mitigations</i>
7428	Sandford Lodge, Sandford Close, Sandford Road, Dublin 6	The Villa is positioned at a considerable distance from the proposed development and will not be impacted by the proposed development. <i>Mitigations</i> <i>No mitigations are envisaged as being required.</i>
7456	87 Sandford Road, Dublin 6	The townhouses are positioned at a considerable distance from the proposed development and will not be impacted by the proposed development. <i>Mitigations</i> <i>No mitigations are envisaged as being required.</i>
7457	89 Sandford Road, Dublin 6	
7458	132 Sandford Road, Dublin 6	Although physically closer to Sandford Road and larger in scale than the present building complex, the visual impact of the proposed development on the villas will be reduced by the shielding effect of the extant boundary wall and mature tree canopy, which will be retained. The front elevations of the protected structures are approximately 55m from the most immediate proposed residential building.
7459	134 Sandford Road, Dublin 6	
7460	136 Sandford Road, Dublin 6	
7461	138 Sandford Road, Dublin 6	

		<p>Chapter 9, Landscape and Visual Impact Assessment of this EIAR, Table 9.7: Assessment of Potential Visual Effects, View 3, predicts an impact for the street opposing the subject site as being slight-neutral, on the basis of a low magnitude of change, as follows:</p> <p><i>The site's main landscape/visual asset, the trees, would be largely unaffected by the development.</i></p> <p><i>The buildings would be screened in summer, and in winter Building A would be visible but filtered by the trees. At this proximity the design and material quality of the building would be evident.</i></p> <p><i>The introduction of a building of urban typology and scale would cause a change in character. However, in the context, i.e. at the junction of two main thoroughfares, this is not inappropriate.</i></p> <p><i>Being lower than the treeline, the building would cause no increase in visual enclosure. The character of the view would change but there would be no reduction in visual amenity.</i></p> <p>A daylight analysis undertaken by 3D Design Bureau has found the proposed development will have an imperceptible impact on the front windows facing towards the subject site.</p> <p><i>Mitigations</i>  <i>The proposal to retain sections of original boundary wall, together with introducing new sections with permeability through the site where its sylvan character will be safeguarded, will lessen visible change from the enclosing urban realm in one sense, whilst enhancing it in revealing the proposed parkland as an extension to the public realm.</i></p>
RPS	Clonskeagh Road	<b>Potential impact / Mitigations</b>
1909	2 Clonskeagh Road, Dublin 6 (1 St. James's Terrace)	<p>Chapter 9, Landscape and Visual Impact Assessment of this EIAR, Table 9.7: Assessment of Potential Visual Effects predicts an impact for St. James's Terrace, as being medium-positive, on the basis of a medium magnitude of change, as follows:</p> <p><i>The tall element of Block A, set back behind the retained woodland belt inside the site boundary, would be a prominent addition to the view, protruding above the tree line. Due to its height the building would be sufficiently exposed to be identifiable. Its design and material quality would also be revealed.</i></p> <p><i>Due to its separation distance from the street and the surrounding houses and the screening effect of the</i></p>
1910	4 Clonskeagh Road, Dublin 6 (2 St. James's Terrace)	
1911	6 Clonskeagh Road, Dublin 6 (3 St. James's Terrace)	
1912	8 Clonskeagh Road, Dublin 6 (4 St. James's Terrace)	
1913	10 Clonskeagh Road, Dublin 6 (5 St. James's Terrace)	
1914	12 Clonskeagh Road, Dublin 6 (6 St. James's Terrace)	
1915	14 Clonskeagh Road, Dublin 6 (7 St. James's Terrace)	
1916	16 Clonskeagh Road, Dublin 6	

	(8 St. James's Terrace)	<i>trees, the building can be comfortably accommodated beside the wide junction.</i>
1917	18 Clonskeagh Road, Dublin 6 (9 St. James's Terrace)	<i>A new architectural feature of high quality would be introduced in an appropriate location, adding visual interest and improving townscape legibility, with no negative effect on any valued feature or characteristic.</i>
1918	20 Clonskeagh Road, Dublin 6 (10 St. James's Terrace)	<i>Another element of note is the proposed new treatment of the boundary wall and the new public pedestrian entrance at the corner of the site. These would encourage public access and use of the open space internal to the site.</i>
1919	22 Clonskeagh Road, Dublin 6 (11 St. James's Terrace)	<i>In respect of View 9, it continues to state:</i>
1920	24 Clonskeagh Road, Dublin 6 (12 St. James's Terrace)	<p><i>The development would be screened in the summer.</i></p> <p><i>In winter the tall element of Block A would protrude above the foreground trees. Due to its modern urban typology, contrasting with the existing buildings in view, the development would shift the townscape character towards a more urban condition. This is not inappropriate given the location, and there is sufficient separation distance and screening to avoid dominance of the houses by the proposed building.</i></p> <p><i>The Clonskeagh Road townscape corridor can withstand the change without weakening its character.</i></p> <p><i>As in the other views from the roads approaching the site (e.g. Views 1 and 4), the development would improve legibility without affecting visual amenity.</i></p> <p>No.1 St James's Terrace (RPS.Ref: 1909) positioned at the junction of Milltown Road and Clonskeagh Road has a rear structure with windows facing west towards the subject site. This secondary structure is located approximately 65m from the most immediate proposed residential building</p> <p>It is proposed to alter the curved boundary wall at the north-eastern corner of the site, to provide additional pedestrian entrances to improve permeability through the site. The rendered wall will be removed and a high railing comprising open vertical fins on a masonry plinth will be introduced along this curved section. The proposed replacement of the wall, with a more permeable structure using contemporary materials, has the potential to alter the established setting of No.1 St. James's Terrace. Although this length of wall has no architectural significance, it does form part of the accepted streetscape, however, the protection of the mature tree buffer and the careful</p>



		<p>crafting of the new railings and gate using high quality materials, sympathetic to the surrounding context, will reduce the visual impact of the intervention on the streetscape.</p> <p>By virtue of its scale, the proposed development will be visible from within No.1 and No.4 St. James's Terrace. The structures fronting onto Clonskeagh Road are set at an oblique angle to the proposed development and buffered by mature planting which will reduce the visual impact.</p> <p>A daylight analysis undertaken by 3D Design Bureau has found the proposed development will have an imperceptible impact on the gable windows facing towards the subject site.</p> <p>Nos. 6 –24 St. James Terrace are positioned at a considerable distance from the proposed development and will not be impacted by the proposed development.</p> <p><i>Mitigations</i>  <i>The protection of mature trees and supplementary planting will reduce the visual impact of the new development. Contemporary interventions to the boundary wall will be undertaken using high quality self-finished materials, and selection of a muted colour palette sympathetic to the existing historic context to reduce impact on the streetscape.</i></p>
RPS	Milltown Road	<b>Potential impact / Mitigations</b>
5248	1 The Colonnade, Milltown Road, Dublin 6	Given the positioning of the terrace, at a distance south of the proposed development, separated by multiple properties, these residences will be screened from the proposal and will suffer no adverse impacts from its construction.
5249	2 The Colonnade, Milltown Road, Dublin 6	
5250	3 The Colonnade, Milltown Road, Dublin 6	<i>Mitigations</i> <i>No mitigations are envisaged as being required.</i>
5251	4 The Colonnade, Milltown Road, Dublin 6	
5252	Greenfields, Milltown Road, Dublin 6	The positioning of Greenfields from the proposed development site, together with it being located on the opposing side of Milltown Road is considered to be at such a distance to preclude impacts.

#### 7.5.5 Potential impacts for the adjoining Jesuit community building group

The group is connected to a residential building attached to the Jesuit Community by way of a single storey-over basement link, which will be partially removed as part of the proposed development. A new boundary wall will be constructed between the two entities. The loss of part of the modest link building will not present an adverse architectural impact.



The proposed boundary will be clad with random uncoursed granite, with a sloped stone coping, to match the finish of the existing enclosing walls.

A line of Portuguese Laurels will be planted along the western side of the boundary wall to protect the sylvan setting.

The community building grouping, its access from Milltown Road, car parking and playing fields will remain unaffected by the proposed development.

7.5.6 Summary of potential impacts

Table 7.5.3: Summary of significant effects of the development on architectural heritage

		Impact Without Mitigation					Mitigation Measures	Monitoring	Impact With Mitigation / Monitoring				
Likely Significant Effect	Extent	Quality	Significance	Duration	Type	Probability			Quality	Significance	Duration	Type	Probability
Demolition of buildings on the site	Local	Moderate	Slight	Long-Term	Direct	Likely	Construction of compatibly designed replacement buildings		Positive	Significant	Long-Term	Direct	Likely
Retention and presentation of the Chapel and Tabor House	Local	Positive	Significant	Long-Term	Direct	Likely	Purposeful re-use and enhancement of setting as independent buildings of character	To be monitored by a conservation architect	Positive	Significant	Long-Term	Direct	Likely
Demolition of part of the enclosing boundary onto Milltown and Sandford Roads	Local	Moderate	Slight	Long - Term	Direct	Likely	Selected openings to generate visual connections, repair and treatment of wall within a carefully designed boundary presentation strategy	To be monitored by a conservation architect	Positive	Significant	Long-Term	Direct	Likely
Changes to the character of the ACA	Local	Neutral	Moderate	Long - Term	Direct	Likely	Enhanced screening to reduce the visibility of the development from within the ACA; careful placement of buildings to ensure visual changes from within the ACA are minimised. Enrichment of the ACA in the offering of a parkland adjacent.		Moderate/positive	Slight/Significant	Long-Term	Direct	Likely
Disruption to protected structures at construction stage	Local	Moderate	Slight	Short - Term	Direct	Likely	Construction management	To be monitored by contractor	Moderate	Slight	Short- term	Direct	Likely
Altered character of the setting of	Local	Moderate	Slight	Short - Term	Direct	Likely	Enhanced screening to reduce the visibility of the development from		Moderate	Slight	Long-Term	Direct	Likely

protected structures at operational stage							neighbouring protected structures; careful placement of buildings to ensure visual changes are minimised							
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## 7.6 Potential Cumulative Impacts

At construction stage, the existing, tall boundary wall that presently defines the architectural setting of the site from within the public realm will be temporarily supplemented with hoarding to overcome possible environmental changes arising from the works. Methodologies for consolidation and repair of shared boundaries will be executed in order to maintain their integrity and mitigate risks arising from the works.

On completion of the development, the cumulative impact on the largely 19<sup>th</sup> century environs of the site will be considerable. The subject site has, since its institutionalisation in the late 19<sup>th</sup> century, set itself apart from the character of its environs, which has no precedent in architectural or morphological terms. That same environment has withstood the perceived hostility of its impermeable boundaries as defining the urban character of Milltown Road in particular.

Notwithstanding the inevitable change in character, other schemes of scale such as Rowan Hall and Grove House Apartments, have been constructed in the vicinity of the subject development site, all contributing collectively to the increasingly 20<sup>th</sup> century character of the townscape due east of Milltown Road, which has proven that it can tolerate and indeed embrace structures of scale and contrasting design.

It follows that the site's redevelopment, whilst maintaining the character of its sylvan boundary to the north and east, will seek to exploit its scale, street frontage and historical pattern of diverse and successive redevelopment, in the generation of a more ambitious scheme than presently exists- all of which will be tempered by its parkland setting.

The subject site's changing chronology over time introduced, at each successive stage of development, buildings of immense scale, density and architectural treatment, radically contrasting with the smaller scale residential character of 18<sup>th</sup> and 19<sup>th</sup> century buildings in the vicinity. At each stage, the enclosing urban environs embraced an evolving character.

The cumulative impact of building on a tradition of ambitious development on this site is thus held to be lessened on account of the site's existing and past morphological character, and how that same character was accommodated by its enclosing environs on account of the proportions of Milltown and Sandford Roads, and a passive sylvan boundary to these roads.

## 7.7 Monitoring Required

Archaeological monitoring and recording will follow the demolition of structures and the excavation of the site. Please refer to Archaeological Impact Assessment (Archer Heritage Planning) - Chapter 6 for further detail.

The main contractor for the scheme will monitor works in the vicinity of retained historic buildings and enclosing boundary walls on a daily basis, to ensure that protection measures are observed at all times.

## 7.8 Avoidance, Remedial or Reinstatement Measures

### 7.8.1 Avoidance

Institutional functioning of the building range permanently ceased in 2019 with the Jesuits retaining buildings required for their future operation south of the subject site.

The building grouping's architecture is, regrettably, inseparable from its function.

As stated, a great many impediments are presented in converting a purpose-built institutional building range to an alternative use, often arising in the loss of external and internal character upon which its significance is based.

Each of the buildings were either constructed by the Jesuit community or, as in the case of Milltown Park House, heavily modified to fulfil very specific functions directly supporting that specific institutional use. Its original developer, the Jesuit Community, have departed this particular building range retaining buildings they need to the south of the application site, on the basis that its institutional offering is no longer viable.

If the development does not proceed and all buildings remain intact, their particular institutional function for which they were used has ceased. The Jesuit Community has confirmed that the subject buildings are no longer required by the Society for the purposes of its functions and missions.

Alternative use, such as residential, would require extensive modifications and upgrades that would dramatically alter its character.

Whilst it can be stated that no change will arise in the short term from the present condition if the subject lands remain undeveloped, the future of the building range is uncertain. In the do-nothing scenario the buildings would remain obsolete and the condition of the buildings, which require investment to repair and maintain, will continue to deteriorate with no alternative use likely to be viable.

Protection of the existing entrance will be accommodated as follows:

- Entire structure to be recorded visually and in drawing format prior to commencement of works
- Metal gates to the vehicular entrance to be retained in open position
- A new site entrance to be positioned south of the gate structure
- The existing gate piers and metalwork (in open position) will be enshrouded within a framework of hoarding, which will be tied to the existing structure, but not mechanically fixed to it
- Hoarding to be removed following completion of works and elimination of risk of construction-related damage
- On removal of hoarding, a separate schedule of conservation works to be prepared to conserve the structure in its entirety in the long term



### 7.8.2 Remedial Measures

The proposal to restore and adapt selective buildings, which are deemed to be both of heritage significance and suitable for purposeful adaptation, has been conceived to minimise the extent of loss across the site as a whole.

The works proposed to the buildings selected for reuse, have been designed with the objective of preserving the character of the site and detailed to minimise unnecessary loss.

Measured surveys and photographic records have been undertaken to provide an archival source and comprehensive record of the buildings, as they now exist. A copy of the surveys will be submitted to the Irish Architectural Archives for research purposes. This resource will be added to when careful recording of Milltown Park House and accumulation of findings as to its composition is possible.

Remedial measures will ensure that the characteristics of the boundary condition are restored to their present character on completion of the development. These will include protection of mature trees and planting during the construction phase that contribute to the sylvan character of the subject site.

### 7.8.3 Reinstatement measures

It is proposed to maintain in the first instance, but reinstate if required, boundary conditions onto Milltown and Sandford Roads on completion of the works.

It is further proposed to prevent, in the first instance, but reinstate if required, damage to retained structures of Tabor House and the Chapel during the demolition process, in accordance with conservation methodologies.

In the execution of separation works in the part-demolition of the red brick link building as described in Section 7.5.3.2. above, it is proposed to construct a new gable on the surviving length in red brick.

## 7.9 PREDICTED IMPACT OF THE PROPOSED DEVELOPMENT

Taking the above mitigating measures into account, the following predicted impacts on the site as a whole, each of the distinct structures within the building group and the heritage characteristics of the wider urban area are considered below.

### 7.9.1 Principle of redevelopment of a site, where the Chapel and Tabor House are retained

Development of the existing site is inevitable. The existing building range has evolved in direct response to its religious institutional function and is inseparable architecturally from that function. Its function has now become obsolete and the buildings vacated. An uncertain future for the building range was determined when their original function was permanently lost. In the absence of a corresponding compatible function, their wholesale re-use is architecturally and economically unviable. None of the buildings within the grouping are protected structures, and not being afforded statutory protection are subject to the same rigours of statutory compliance as new build structures.

As a consequence, the removal of certain buildings to generate a viable residential scheme is not unexpected. Their removal is mitigated in the selected retention and careful presentation of the groupings most significant pair of historic buildings, as has been described in previous sections and in the attached Appendix 7.3. Further mitigations are proposed in the execution of a detailed building inventory, supported with accurately documented survey drawings.

The retention of two buildings for purposeful re-use within the vast building range presents an inherently positive impact for the legibility of the original function of the site.

The proposed development has emerged in direct response to the positioning, orientation and setting of the retained pair of buildings. The presented integrated approach to this unique site's redevelopment absorbs the challenges of cohesive urbanism to a greater extent than would be possible if it were developed piecemeal.

The scale and positioning of the site affords it special consideration in its capacity to offer a unique urban contribution. In response, the design of the proposed replacement building grouping has evolved in efforts to merge with its established, historic and characterful urban environment.

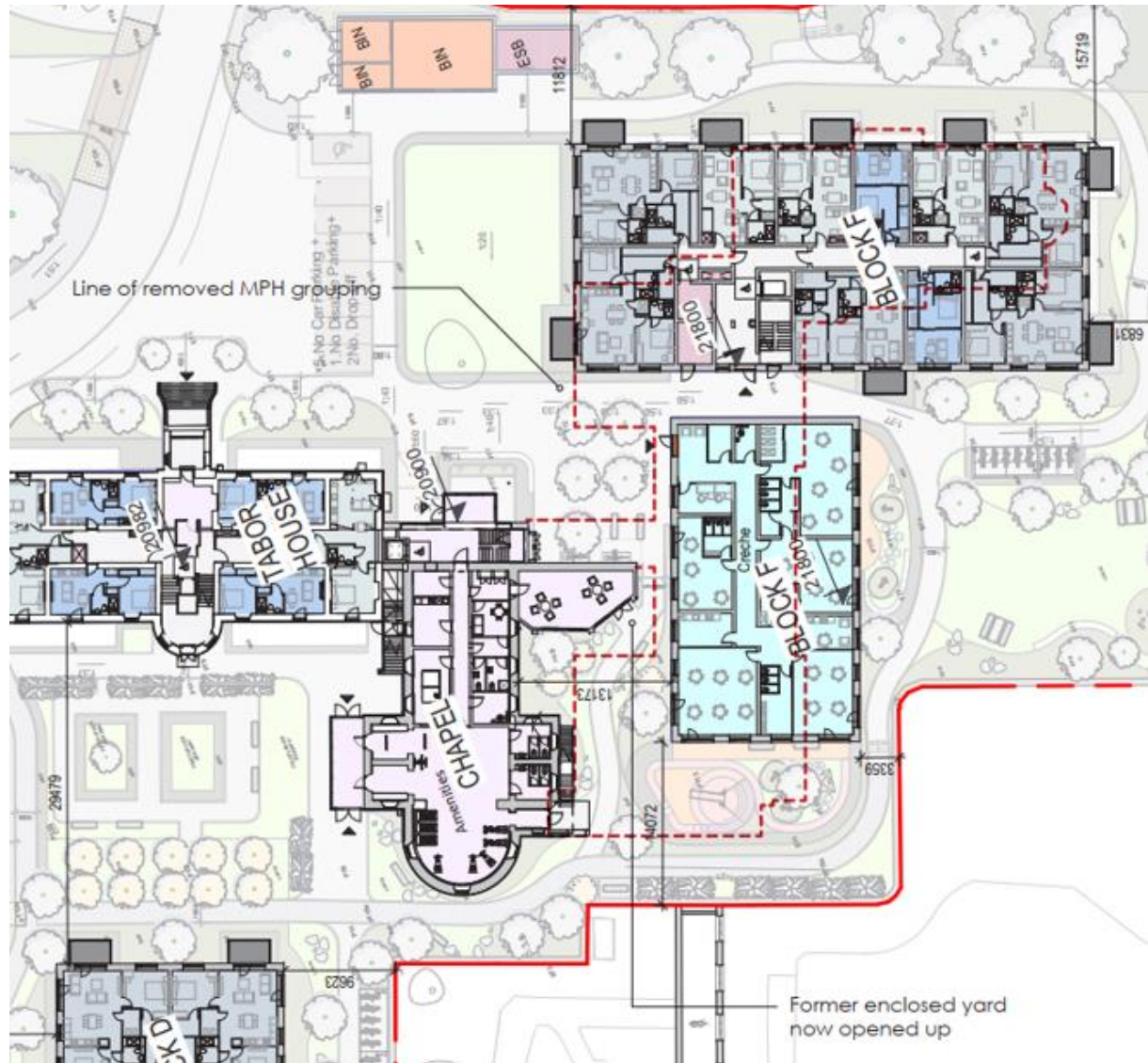


Figure 7.9.1: Block F in context with the Chapel, extracted from the OMP Masterplan and Architectural Design Statement

Connections will be made through a parkland amenity, opening up the site in a manner never previously enjoyed by the public.

Whilst selected predicted impacts are outlined further below, the scheme on the whole emulates the morphology of what exists on the site currently, in the formation of building blocks taller than their enclosing structures.

The scale of the proposed scheme offers an opportunity to connect the public realm enclosing the subject site in a manner not enjoyed at present, but which will greatly enhance the future co-existence of established and new communities in the generation of carefully positioned proposed pedestrian thoroughfares.

The proposal, rightfully, has demanded a forensic review of its wider urban environment and how it may be impacted by a denser, taller mixed-use development.

Findings yielded from the lengthy design process have helped shape the proposed development as now submitted, tempered to respect the amenities of enclosing residences and buildings.

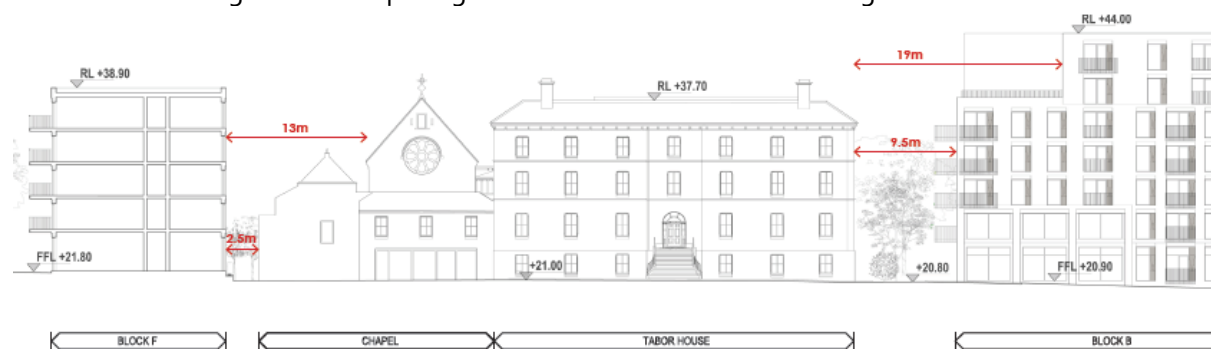
The review below examines selected impacts for each urban interface with the proposed development, in identifying predicted impacts.

### 7.9.2 Predicted impact of the setting of the retained buildings (the Chapel and Tabor House) in the context of the new development

The alteration to the immediate setting will be major, permanent and positive. The architectural character of the Chapel and Tabor House, which both have strong architectural forms, will endure and will not be adversely compromised by the construction of contemporary residential blocks. The demolition of adjoining buildings of lesser architectural character enhances the status of selected retained fabric in their reimagining as detached structures forming a focal point for the development, giving rise to a positive impact

The proposed building in closest proximity to the existing structures are comparable in scale to the existing structures and a minimum distance of approximately 9m is observed to avoid encroaching directly on the buildings. The positioning of the buildings presents an opportunity for dialogue between the historic and contemporary interventions and the creation of usable pocket parks between the entities is a successful method of integrating the existing fabric into the proposed residential scheme.

The approach to the buildings has been carefully considered and proposed Block B has been crafted to preserve and frame the views of Tabor House on approach through the omission of the lower floors at its southern gable. The permeability of the new forms presents a playful contrast against the imposing forms of the institutional buildings.



**Figure 7.9.2: Distances between the Chapel and Tabor House and adjacent blocks, as extracted from the OMP Masterplan and Architectural Design Statement**

The materiality of the proposed buildings has been similarly deferential to the existing building fabric. The honey-coloured tones of the granite are reflected in the choice of buff brick and muted copper and bronzed metals, which equally sit favourably against the sylvan parkland setting.

### 7.9.3 Predicted impact of the development on Tabor House

#### 7.9.3.1 *Proposed adaptive reuse*

It is proposed to adapt the building for residential use. On account of its position on site and its relative independence from the adjoining buildings in the group, Tabor House is the most outwardly prominent of the buildings on the site. The preservation of its original form and the conservation and repair of the external fabric will present a positive impact.

The proposed modifying works to the interior of Tabor House are required to adapt the building for reuse. Securing a sustainable reuse, while respecting the character of the structure, will have a beneficial impact. The existing cellular configuration is compatible with a typical residential typology with regular, repetitive module. Furthermore, the generous floor to ceiling heights facilitates the distribution of services without detriment to the character of the existing building.

#### 7.9.3.2 *Proposed architectural interventions*

Tabor House was purpose built in 1875 for retreat purposes for the Jesuit community. The plan of the building is repeated on each of the four floors. The former domestic rooms are arranged in a linear fashion either side of a wide central spine corridor with the main stairs, positioned within the central bowed bay. The rooms are typically rectangular in plan, with generous floor to ceiling heights and feasibility studies\* prepared by OMP architects have concluded that the building can be successfully adapted for residential use without undermining its architectural character.

It is proposed to reconfigure the existing rooms to create six residential units per floor. Typically, the dividing wall between two of the existing rooms will be removed to create a one-bed apartment with separate living space. The rooms in the end bays will be combined, incorporating part of the existing corridor to create a single residential unit.

The exterior form of Tabor House will be unaffected by its proposed adaptation to residential use. It is not proposed to introduce external balconies, as they could not be incorporated without significantly detracting from the character of the structure.

Internally, the proposed adaptation of the building will have a minor impact on the surviving 19<sup>th</sup> century architectural features within the structure. The interiors of Tabor House are relatively simple. Plain-run moulded cornices are limited to the central stair with the majority of the rooms having no decorative plasterwork. The interior joinery is pleasant but conventional, comprising of panelled doors, moulded skirting and simple shutters and sash windows.

Proposed layouts have been designed to align with the existing window positions to respect room configurations where practicable. It is intended to retain and repair the existing sash windows and have restrictors fitted for safe use.

The majority of the original chimneypieces have been previously removed; those, which are surviving, will be incorporated into the living accommodation of the proposed new residential apartments.

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\* OMP feasibility study is separately appended.





**Plate 7.9.1:** A lift will be installed within the open well of the stairs within the central bowed bay.



**Plate 7.9.2.:** The new partition walls are positioned at an appropriate distance from the extant windows to avoid interfering with the composition of the architraves and shutter boxes.

### *7.9.3.3 Proposed window and door interventions*

It is proposed to carefully restore and repair original timber window joinery. To improve thermal performance, it is intended to introduce secondary glazing, within a deeper window surround arising as a consequence of wall insulation measures. The extant windows add considerable character to the building, and their retention is considered paramount, even in light of associated impacts in dismantling and reinstating fixed wall joinery to accommodate wall insulation.

In instances where windows have previously been replaced with inappropriate uPVC windows, new timber sashes will be installed to match the existing, with regard to the original fenestration pattern, materiality and profile of existing glazing bars.

Existing doors, which do not satisfy required fire ratings will be relocated within the individual apartments and new doors, which are sympathetic to the existing style, will be installed. Where existing doors are redundant as a consequence of the revised configuration, the opening will be infilled, the architraves removed and new skirtings, to match the existing, installed.

### *7.9.3.4 Proposed accessibility strategy*

The existing sweeping steps to the principal entrance to Tabor House are an integral part of the character of the building, however the stepped approach is not compatible with universal

access. It is proposed to supplement the existing entrance with level access at lower ground floor level and a lift will be installed to facilitate accessible circulation internally.

The main stairs, positioned in the central bowed bay, will be retained as the primary circulation route. A lift will be installed within the open well to facilitate accessible access to all levels and consequentially the handrail on the landings will require modification.

The secondary stair in the south-east corner serves all floors of the building. The stairs is utilitarian in nature with a simple but elegant design. In its present form, this stair is not compliant with current regulations and the fire strategy has determined that it is unsuitable for use as part of an escape route.



**Plate 7.9.3: The secondary stairs in the south of Tabor House will be removed to facilitate the revised spatial configuration**

It is regrettable that this stair cannot be retained in the reconfigured design but its retention, without purpose, would reduce the quantum of potential residential units by a third and compromise the layout of the others, which would ultimately render the proposed adaptive reuse of the structure economically unfeasible. As a mitigating measure, this secondary stair will be recorded and carefully disassembled for potential salvage.

A new stair, compliant with fire and accessibility regulations, will be provided at the northern end of the existing corridor instead. The generous width of the existing corridor can accommodate this intervention without negatively impacting the architectural quality of the interior spaces.

#### *7.9.3.5 Proposed services strategy*

Typical of comparable mid-late 19<sup>th</sup> century buildings, when Tabor House was constructed in 1875, the structure was equipped with rudimentary building services only. Heating was

provided by way of open fires within each of the main rooms. The sanitary facilities were shared and positioned in the south-east corner of the building. Meals were served communally within the refectory in the Finlay Wing and consequentially the rooms were not equipped with kitchen facilities.

Additional building services including a centralised heating system and electrical system were subsequently installed during the 20<sup>th</sup> century. All such later services are exposed, having surface mounted electrical cables, sockets and heating pipes, with consequential localised damage to plasterwork and joinery elements.

The proposed residential use naturally requires the provision of bathrooms and kitchens within each unit. As a consequence of the repetitive nature of the floor plans, the services can be stacked efficiently thus minimising the need for horizontal distribution of service routes and subsequently will have less impact on the existing historic fabric.

#### *7.9.3.6 Proposed fire safety strategy*

Any proposed alternative use of the building will naturally be required to comply with current statutory regulations.

The configuration of the residential units and the designated escape routes have been designed by OMP architects in consultation with a fire engineer. The extant corridor is sufficiently wide to accommodate the necessary introduction of lobbies to achieve safe use of the building with only a minor impact on the interior spaces. The new fire rated screens will be detailed to sit harmoniously beside the existing architecture.

In the few instances where original lath and plaster ceiling with cornices survive, it is proposed to carefully safeguard same in the affixing of fire-retardant material installed between, and potentially above, existing floor joists, with minimal impact to building fabric. This intervention will be carefully coordinated with both the soundproofing consultants and the structural engineers and will be sequenced on site to ensure that the maximum amount of the extant building fabric can be retained and reinstated post installation.

Where replacement modern plasterboard is found, new fire rated ceiling board will be installed.

#### *7.9.3.7 Proposed insulative measures*

A range of potential thermal upgrades to the inside face of the exterior walls and underside of roof were considered by the design team.

##### *External Wall Insulation*

*It is intended to apply* insulation linings to the internal faces of external walls, with the dual products Optima (glass fibre) and Pavadry (timber). To achieve the installation, it is proposed to carefully dismantle window boxes and skirting boards to external walls and reinstate them in a new position aligned with the lining.

OMP also propose to use the additional depth to accommodate a zone for secondary glazing, which might assist in the thermal performance of existing single glazed timber sash windows. This measure might allow retention and conservation-led repair of existing windows, which might not otherwise have capacity for thermal improvement in themselves.

The insulated wall linings will extend to the underside of cornices, where they survive (please note that only limited cornices survive in the building).

#### *Ceilings/Floors*

It is proposed to insulate the attic level, whilst retaining ventilation above as required of a traditional pitched roof.

Original floorboards will be retained and repaired. Internal walls will retain affixed joinery (skirtings/ picture rails) in situ.

#### *7.9.3.8 Proposed structural interventions*

The introduction of two lifts within Tabor House will necessitate some structural underpinning to create a lift pit. The first lift is proposed within the open well of the existing central stairs and a second, which will serve the Chapel, is positioned adjacent to the south gable of Tabor House. These interventions will have a moderate and permanent impact on the building but are necessary to facilitate the purposeful reoccupation of the buildings.

The proposed removal of interior walls to give effect to the new residential units will require the localised installation of steel beams to provide alternative structural support to the floors above.

It is anticipated that a degree of repair will be required to the existing structure, including the splicing of decayed timber joist ends embedded in exterior masonry and repair of the main roof structure.

#### *7.9.3.9 Proposed damp alleviation measures at lower ground level*

It is proposed to remove the existing concrete floor slab and replace it with an insulated slab. It is further proposed to excavate lightwells externally, some of which have concrete surfaces level with internal floor levels. In reducing the level of external lightwells, providing adequate surface drainage, and lining the lightwell with pea gravel, it is possible to alleviate damp ingress at wall base level. Existing surface water drainage will be replaced to ensure that it has capacity to safeguard the drainage of lightwells. It is hoped that passive alleviation measures will negate a requirement to introduce impermeable tanking systems.

A Basement Impact Assessment carried out by DBFL, advises in Section 5.3, that slight damage might occur in the generation of basement level works, requiring a range of temporary and permanent works to mitigate the risk of long-term damage.

#### *7.9.3.10 Proposed external wall vents*

It is proposed to install external wall vents to each residential dwelling. It is proposed to core the masonry with a 100mm diameter drill to achieve the opening and provide round stainless-steel grilles pointed to adhere to the adjoining granite masonry.

#### *7.9.3.11 Proposed external envelope repair*

It is proposed to repair the slated roof using traditional methodologies. It is also proposed to repair/ replace copper linings where cracked.

Chimney fabric will be repaired locally, as required. Whilst flues will remain inactive, as they have been for decades, it is intended to retain ventilation to each flue, whilst securing fire separation between each residential unit.

It is proposed to replace corroded rainwater goods and replace like with like profiles in cast iron. Where sound, original cast iron rainwater goods will be repaired and redecorated.

Rooflights have been replaced with Velux alternatives, and it is proposed to retain these elements.

The external granite masonry is generally found to be in good condition, with the exception of dissolution of mortars behind leaking downpipes, and where damaged at base level due to excessive damp. Such areas will be subject to careful, localised consolidation and lime-based repointing.

### **7.9.4 Predicted impact of the development on the Chapel (Building D)**

#### *7.9.4.1 Proposed adaptive reuse*

The outward presentation of the Chapel, which is presently extensively obscured by surrounding buildings, will be permanently altered by their removal, to the significant benefit of the Chapel. The Chapel as an architectural piece presents a strong external form that has not suffered as a consequence of its construction between and consequential encroachment by earlier structures. Notwithstanding its existing enmeshment with these structures, it is afforded no dedicated entrance or 'front elevation' worthy of a building of its significance. Its detachment will reveal its form as an independent structure in a redefined, improved and wholly positive setting on completion of the development.

The relationship between the Chapel and the structures to the south, which are to be demolished, is incidental and a consequence of function rather than the result of an overarching scheme. The interstitial courtyard is utilitarian in nature and devoid of architectural features of interest.

The relationship between Tabor House and the Chapel building is similarly haphazard, but more care has been taken in its execution, which is evident through the use of high-quality materials and workmanship on the external stone stairs and the gallery link between the two structures. This evolved relationship; having some architectural merit will be maintained.

The integration of the Chapel within the proposed residential scheme has been carefully considered. The proposed reuse of the interior as a shared community space will retain the continuity of use of the building in its capacity as a centralised, shared place of assembly. This continuity is positive and facilitates the preservation of the main space as single volume. Naturally, the elements depicting religious iconography that are not an integral part of the built fabric will be removed in response to its proposed secular function. Ecclesiastical features that do form part of the fabric are described in more detail below.



A landscape buffer has been provided around the Chapel to protect the legibility of its historical form. The strong, characterful form of the apse will naturally retain its prominence on the site, albeit within a much-altered setting. The repair of the external fabric of the Chapel will have a positive impact.

#### *7.9.4.2 Architectural interventions*

As described in 7.9.4.1. above, the design team intends to meaningfully incorporate the Chapel building (Building D) into the proposed development as a central shared community space. It is intended to repurpose the upper ground floor of the chapel as a multipurpose hall for use by the residents. The retention of a single volume space, within the main body of the chapel, ensures that the legibility of the original architectural intent will be maintained. Furthermore, the vaulted timber-clad ceiling and roof trusses will remain exposed and appreciable within the reconfigured space.

Inevitably, some interior alterations will be necessary to facilitate any alternative use. In the interests of accessibility, the provision of sanitary facilities at the same level as the main room to support the flexible space is necessary. It is proposed to position the sanitary facilities within in the west transept, to avoid impinging on the central nave of the Chapel. A counter/ prep. area will be positioned in the opposing wing, to serve the central space. The adjoining oratory will be repurposed as a billiards room, or a foyer.

#### *7.9.4.3 Introduction of secondary wall linings*

It is proposed to install ventilated lining up to window cill level to introduce services and ensure that the original marble linings are not punctured. The reversibility of this measure is welcomed.

#### *7.9.4.4 Insulation strategy*

It is not proposed to insulate the walls of the chapel, due to the range of decorative stone claddings.

At decoration stage, breaches to the coffered ceiling panels will be sealed and air leakage reduced accordingly.

It is considered that the reconfiguration of the interior will have a minor impact on the appreciation of the interior of the chapel building and in the interest of securing an appropriate alternative use this proposed intervention is considered reasonable.

#### *7.9.4.5 Proposed new entrance*

It is critical that the Chapel be occupied and repurposed in a meaningful way to secure its future protection and improving the access to the structure and integrating it into the proposed scheme is critical to its successful adaptation.

When constructed in 1895, the structure was purpose built as a domestic chapel or oratory for private use within the institution and this is reflected in the physical approach and access to upper floor level. At present, there are two existing external access doors at the lower level; one to the north beneath the external stone steps and a second to the east, via the link corridor. Both external entrance doors are modest in size, designed to facilitate access to the ancillary spaces and intended to be subservient to the primary entrances on the principal floor

above. A third access, adjoining the transept aisle to the southwest connects the lower floor to an internal corridor, which is in turn connected to the rear extension of the Milltown Park grouping. The primary access to the principal floor of the Chapel is internalised, within the link corridor between the MPH complex and Tabor House.

In its new role, an independent and accessible external access the principal level is required to facilitate its proposed use as a shared amenity space. It is proposed to construct two new entrances to facilitate access into the former chapel and to improve its connection with the proposed development. The primary entrance will be on the east at the lower floor, which is aligned with the external ground level. The proposed entrance foyer is well crafted and contemporary in design to clearly distinguish it from the historic fabric. A Part M compliant stairs and lift have been introduced within the existing link corridor, to provide access internally up to the principal floor level. Retaining the existing central arrival into the Chapel through the existing doors is fundamental to the appreciation of the interior space.

It is proposed to remove the remaining length of the link corridor, which will become redundant as a consequence of the proposed demolition of the rear extension. The internal connection to Tabor House, which is no longer required, will be infilled.

The existing door opening to the oratory will be reconfigured as a window to increase the daylight into this space.

A secondary glazed entrance will be constructed on the east wing and the cills of the existing window openings will be lowered and converted to doors.

Access to the choir balcony from the first floor of Tabor House will be retained with access limited for maintenance only. The organ, rose window, and pews at this level will also be retained as an intact space reflecting its original use.

#### *7.9.4.6 Improved accessibility*

To improve the buildings accessibility, it is proposed to remove the raised timber floor to the altar and retain the principal level of the Chapel, which will be accessed from its entrance by a shallow ramp to overcome raised floor levels. The proposed removal of the altar floor will be countered by extending wall finishes in painted timber below extant finishes to meet new floor levels.

In recent investigative works, sections of mosaic tiles were found under the altarpiece, the extent and condition of which is not known. It is proposed to carefully uncover the floor and confirm if it can form part of the floor linings of the chapel. If damaged, or incomplete, it is proposed to lay an 8mm sheet of plywood above the floor to protect it and provide a carpet over. No fixings through the mosaic finish will be permitted. The outline of the altar will also be reflected within the design of the new floor finishes to retain the proportions of the two spaces.

#### *7.9.4.7 Stained glass windows and other ecclesiastical elements*

A specialist in the field of stained glass will be engaged to appraise all the stained-glass windows within the Milltown Park grouping. Notwithstanding the contribution to the character of the structure, retention of the stained-glass windows in a secular environment may not be appropriate and as a consequence it is proposed to carefully remove these

elements for reinstatement as decorative panels within the subject scheme or elsewhere.

The selective removal of other ecclesial elements has been carefully considered to achieve a balance between accommodating the proposed reuse of the structure without detracting from its character. Fittings, which are not intrinsic to the building fabric, such as the carved altar and the marble pulpit will be carefully removed and relocated. The panels depicting the Stations of the Cross were previously removed by the Jesuit Community on vacating the property.

All elements, which are proposed for removal, will be recorded and submitted to the Irish Architectural Archival.

#### *7.9.4.8 Proposed services strategy*

Sanitary facilities will be positioned in the west wing, aligned beneath those proposed on the floor above to minimise the impact of service runs on the existing fabric.

#### *7.9.4.9 Proposed fire safety strategy*

The fire safety strategy is presently under consideration and the consequential impacts of same will be assessed in due course.

#### *7.9.4.10 Proposed insulation strategy*

It is not proposed to insulate the walls of the chapel, due to the range of decorative stone claddings. It is however proposed to install ventilated lining up to window cill level to introduce services and ensure that the original marble linings are not punctured. The reversibility of this measure is welcomed. At decoration stage, breaches to the coffered ceiling panels will be sealed and air leakage reduced accordingly.

#### *7.9.4.11 Proposed structural strategy*

At lower ground level, it is proposed to install a new concrete slab. The interior subdividing walls at lower ground level provide structural support to the main floor of the chapel above. In the reconfigured scheme, it is proposed to remove a number of these walls and consequentially new steel beams will be required to support the floor. New concrete footings will be required under the existing masonry piers to support the proposed beams.

The integration of a new lift within the link corridor will necessitate the localised underpinning of the northern corner of the Chapel to facilitate construction of the lift pit.

The above structural interventions will have a moderate impact on the building and are necessary to facilitate the purposeful reoccupation of the buildings.

Additionally, The Tabor House link building, which will be retained in part, will be modified to create an appropriate entrance to the repurposed Chapel. The removal of the lower part of the elevation to facilitate the proposed glazed lobby will necessitate the installation for steel beams to support the retained façade on the principal floor.

It is anticipated that a degree of repair will be required to the Chapel, including the splicing of decayed timber joist ends embedded in exterior masonry and repair of the main roof structure.

#### *7.9.4.12 Proposed architectural interventions to the lower ground floor*

The lower ground floor of the Chapel currently comprises a series of small cellular spaces accessed off a central spine corridor. The small spaces restrict the possible use of this floor, so it is proposed to remove some of the central dividing walls to create a larger interior space for use as a screening or cinema room for the benefit of the residents. Surrounding cellular spaces will be retained and repurposed as ancillary support spaces. Lower ground floor external walls will be insulated with a ventilated system.

Existing windows will be repaired.

#### *7.9.4.13 Proposed external envelope repair*

It is proposed to repair the slated roof using traditional methodologies. It is also proposed to repair/ replace copper linings where cracked.

It is proposed to replace corroded rainwater goods and replace like with like profiles in cast iron. Where sound, original cast iron rainwater goods will be repaired and redecorated.

The external cement render, above a granite base, will be locally repaired where cracking is found, although in general the render is considered to be sound.

Localised repointing may be required to the granite plinth where joints are exposed due to dissolution.

#### *7.9.4.14 Proposed damp alleviation measures at lower ground level*

It is proposed to remove the existing concrete floor slab and replace it with an insulated slab. External regrading of surfaces and introduction of permeable surfaces, as cited above for Tabor House, will be continued in the treatment of the Chapel.

### **7.9.5 Predicted impact of modifications to boundary walls and entrance gates**

Please refer to section 7.5.2.4. , above, entitled 'Potential impact of works to boundary walls' where key sections of historic boundaries will be retained and conserved. The entrance gates onto Sandford Road will be conserved. New works are intended to co-exist compatibly with retained sections.

### **7.9.6 Predicted impact of the development on the ACA**

The new residential development will alter the character of the surrounding environment and consequentially the ACA. As a consequence of its historical development as an institutional building range, the subject site plot is somewhat divorced from the surrounding early suburban development and there is an opportunity to develop the land, retaining a degree of containment.

The Belmont Avenue/ Mount Eden Road ACA is separated from the application site by Sandford Road, a heavily trafficked carriageway and buffered by mature planting. Trees that contribute to the setting of the historic structures will be retained where possible and supplemented to reduce visual impacts and screen the proposed development.

The tallest of the proposed structures, at 10 storeys, will be visible above the tree canopy on approach, but its impact will be less perceptible at close-range, where the outward presence of the site characterised by its enclosing tree-lined boundary walls will prevail.

<b>Table 7.9.1: Schedule of predicted impacts on Protected Structures in immediate proximity to the applicant site</b>		
<b>RPS</b>	<b>Sandford Road</b>	<b>Predicted impact</b>
7428	Sandyford Lodge, Sandyford Close, Sandyford road, Dublin 6	The Villa is positioned at a considerable distance from the proposed development, with no impacts arising as a consequence.
7456	87 Sandford Road, Dublin 6	The townhouses are positioned at a considerable distance from the proposed development with no impacts arising as a consequence.
7457	89 Sandford Road, Dublin 6	
7458	132 Sandford Road, Dublin 6	The front elevations of the protected structures are approximately 55m from the most immediate proposed residential building. The taller of the proposed residential buildings will be visible above the tree canopy and will be visible from within the existing buildings.  The retention of key specimen trees will reduce the visual impact of same.  A daylight analysis undertaken by 3D Design Bureau has found the proposed development will have an imperceptible impact on the front windows facing towards the subject site on account of distance and pre-existing screening provided by dense trees at the site boundary.
7459	134 Sandford Road, Dublin 6	
7460	136 Sandford Road, Dublin 6	
7461	138 Sandford Road, Dublin 6	
<b>RPS</b>	<b>Clonskeagh Road</b>	<b>Predicted impact</b>
1909	2 Clonskeagh Road, Dublin 6 (1 St. James's Terrace)	No.1 St James's Terrace (RPS.Ref: 1909) positioned at the junction of Milltown Road and Clonskeagh Road has a setback wing, with windows facing west towards the subject site. This structure is located approximately 65m from the most immediate proposed residential building.  It is proposed to alter a non-original curved section of boundary wall at the north-eastern corner of the site, predominantly comprising rendered blockwork with a limited section of original masonry. It is intended in lieu to provide an additional pedestrian entrance and improve permeability through the parkland, facilitated by
1910	4 Clonskeagh Road, Dublin 6 (2 St. James's Terrace)	
1911	6 Clonskeagh Road, Dublin 6 (3 St. James's Terrace)	
1912	8 Clonskeagh Road, Dublin 6 (4 St. James's Terrace)	
1913	10 Clonskeagh Road, Dublin 6 (5 St. James's Terrace)	
1914	12 Clonskeagh Road, Dublin 6 (6 St. James's Terrace)	
1915	14 Clonskeagh Road, Dublin 6 (7 St. James's Terrace)	
1916	16 Clonskeagh Road, Dublin 6	



	(8 St. James's Terrace)	<p>open vertical fins on a masonry plinth. The proposed replacement with a more permeable structure using contemporary materials has the potential to alter the established setting of No.1 St. James's Terrace. Although this length of wall has limited architectural significance given its dominant composition of rendered concrete blockwork, it does form part of the accepted streetscape. However, the protection of the mature tree buffer and the careful crafting of the new railings and gate using high quality materials, sympathetic to the surrounding context, will reduce the visual impact of the intervention on the streetscape.</p> <p>By virtue of its scale, the proposed development will be visible from rear rooms of No.1 – No.4 St. James's Terrace. The structures fronting onto Clonskeagh Road are set at an oblique angle to the proposed development and buffered by mature planting and existing buildings to the south which will reduce the visual impact. The impact is considered moderate.</p> <p>A daylight analysis undertaken by 3D Design Bureau has found the proposed development will have an imperceptible impact on the gable windows facing towards the subject site.</p> <p>Nos. 6 –24 St. James's Terrace are positioned at a considerable distance from the proposed development and will not be impacted by the proposed development.</p>
1917	18 Clonskeagh Road, Dublin 6 (9 St. James's Terrace)	
1918	20 Clonskeagh Road, Dublin 6 (10 St. James's Terrace)	
1919	22 Clonskeagh Road, Dublin 6 (11 St. James's Terrace)	
1920	24 Clonskeagh Road, Dublin 6 (12 St. James's Terrace)	
<b>RPS</b>	<b>Milltown Road</b>	<b>Predicted impact</b>
5248	1 The Colonnade, Milltown Road, Dublin 6	<p>Given the positioning of the terrace, at a distance south of the proposed development, separated by multiple properties, these residences will be screened from the proposal and will suffer no adverse impacts from its construction.</p>
5249	2 The Colonnade, Milltown Road, Dublin 6	
5250	3 The Colonnade, Milltown Road, Dublin 6	
5251	4 The Colonnade, Milltown Road, Dublin 6	
5252	Greenfields, Milltown Road, Dublin 6	<p>As above, this protected structure is both at a distance from, and densely screened from the proposed development, with no impacts envisaged as arising.</p>

### 7.9.7 Conclusion

#### *Summary of predicted impacts for historic structures within the site*

The above analysis of predicted impacts for retained historic structures within the site amounts principally to their detachment from their parent structures at Milltown Park House. The Chapel and Tabor House evolved subsequent to the original building group, yet now need to acquire their own presence as independent structures incorporating new functions for which they were not designed.

The architectural solution, in the provision of sustainable functions within the retained buildings, together with how they are externally presented as focal set pieces in the development, is deemed to enhance their reimagined continuance, securing their building fabric in the long-term. Carefully designed landscaping responds to the buildings' external form and provides a unifying platform where historic fabric can coexist compatibly with new. The impact of demolition of attached structures is therefore mitigated in how the retained fabric is managed in the proposed redevelopment.

Internally, interventions are required to achieve new functions. All interventions proposed are carefully considered to reduce physical loss of characterful fabric, reducing negative impacts.

#### *Summary of predicted impacts for protected structures in the vicinity of the site*

The proposed retention of boundary character insofar as possible has been devised to respect existing townscape characteristics outside the development site. The enhancement and supplementation of the sylvan character of the site reduces the visual presence of the scheme from the enclosing streets and historic buildings, with the consequence of reducing visual change as experienced by historic and protected structures in its vicinity. Following a careful review of the verified views, presenting the proposed development realistically within the townscape, it is found that the proposal does not materially impact protected structures in the vicinity of the site by way of encroachment or obtrusion. The proposed development might be visible from the setting of protected structures at St. James's Terrace and on Sandford Road, but does not dominate their character.

Similarly, views of the proposed scheme from the ACA are negligible. However, the benefits of an accessible parkland in proximity to the ACA will introduce an immeasurably positive amenity, outweighing a potential impact of loss of the existing introverted condition.

### 7.10 Interactions

In compiling the subject assessment, a detailed review of design strategies presented by the project architects OMP, the design team structural engineers, DBFL and proposed landscaping design prepared by Cameo & Partners has been carried out to review how each impact envisaged in Sections 7.5 and 7.9 singularly and cumulatively interact.

The cumulative effect of impacts in the permanent removal of some buildings within the building range, and sections of boundary wall for the wider urban environment has been examined. Interactions with Chapter 6 of the EIAR, Archaeology and Cultural Heritage and in particular where impacts might be mitigated at demolition and excavation stages, will be observed. As noted in Chapter 6, should earlier building footprints be recorded in the course of monitoring, the results of any subsequent archaeological works will contribute to our

knowledge of the evolution of the Milltown Park complex, and interactions are considered long-term, not significant and positive.

On the whole, the removal of the site's building fabric will introduce an altered morphological urban environment for its vicinity. Demolition and construction phase works will present a short-term impact for neighbouring buildings and their occupants, which notwithstanding mitigations, will arise in disruption, however slight for the protected structures and ACA.

This Chapter acknowledges the site's chronological character as it has evolved since first developed in the early 18<sup>th</sup> century. It has endured successive radical development concentrated between the late 19<sup>th</sup> century and mid-20<sup>th</sup> centuries, with each additional structure more ambitiously formed and scaled than its predecessor. Although largely concealed from the public realm behind a tall stone wall, aspects of the imposing existing building range inform the character of Milltown Road in particular. Its enclosing historic environs have proven that they have the capacity to absorb such architectural and morphological changes, without adversely impacting traditional character.

Impacts arising from the principle of redevelopment are lessened when viewed against the site and its enclosing historic environs' aptitude for singular and cumulative, permanent change resulting in interactions that are long-term, not significant and neutral. In addition, the development will improve the character and condition of the setting of Tabor House and the Chapel with views provided towards the refurbished buildings from Milltown Road, and the modification of the boundary wall will also allow greater public appreciation of the woodland as a landscape/cultural heritage feature. The impact of the interaction between architectural heritage and the landscape is considered to be long-term, moderate and positive.

#### **7.11 Difficulties Encountered**

Due to restrictions since March 2020 due to Covid-19, research of the site in public archives has not been possible. Access however has been provided to extensive, privately held archives in the Jesuit Community. The limitations presented for / prohibiting of research in public archives, whilst atypical for architectural heritage assessment in normal times, are not on balance of all findings, site and archival, believed to alternatively influence the final architectural heritage opinion on significance of structures within the grouping.

## 8.0 BIODIVERSITY

### 8.1 Introduction

This chapter describes work commissioned by Sandford Living Limited, by a letter dated 26 November 2019.

#### 8.1.1 Expertise and Qualifications

The chapter was completed by Malin Lundberg (BSc, MSc), an experienced field ecologist with JBA. Malin has 5 No. years experience of which three are within consultancy. She has prepared Ecological Impact Assessments (EclA) and biodiversity chapters for EIARs for private developers and local authority, including Kilcock Car Dismantlers and South Dublin County Council.

The report has been reviewed by Niamh Burke (BSc (Hons), PhD, CEnv MCIEEM) and Patricia Byrne (BSc (Hons), PhD, MCIEEM). Niamh has 14 No. years experience of environmental and ecological assessment within both consultancy and academia. Patricia Byrne is a Senior Ecologist with 20 No. years experience of environmental and ecological work, with the last five years as an ecologist with JBA. She has authored and reviewed numerous ecological assessments under the Habitats Directive; and prepared numerous EclAs for residential developments, biodiversity chapters for EIARs including King's Island Flood Relief Scheme for Limerick County Council.

All bat related data was reviewed by Tanya Slattery (BSc (Hons), MSc (Res), MSc). Tanya is a licensed Bat Specialist and has 13 years of experience working specifically with bats.

These staff members thus fulfil the Environmental Impact Assessment (EIA) Directive personnel requirements of 'competent persons'.

#### 8.1.2 Aims

The aims of the Biodiversity Chapter are to:

- Establish baseline ecological conditions to enable identification of potentially important ecological features within the zone of influence of the project
- Determine the ecological value of identified ecological features
- Assess the significance of impacts of the proposed project on ecological features of value
- Identify avoidance, mitigation or compensatory measures
- Identify residual impacts after mitigation and the significance of their effects
- Identify opportunities for ecological enhancement and net gain of biodiversity

#### 8.1.3 The Existing Site

The proposed development is situated in an urban area at Milltown Park, Sandford Road, Dublin 6. The site is on a corner between Milltown Road (R117) and Sandford Road (R117). Part of Eglinton Road (R824) is included within the site boundary. The River Dodder is located approximately 0.5km south-east of the site.

The site is zoned Z15 'to protect and provide for institutional and community uses' by (Dublin City Council, 2016a). Figure 8.1 outlines the site location and local mapping.

Currently the site includes open grasslands, treelines, a small woodland and buildings formerly used by the Jesuit College. The existing buildings on site include Milltown Park House with attached extensions, Tabor House, the Chapel, the Finlay Wing and the Archive. (Figure 8.2).

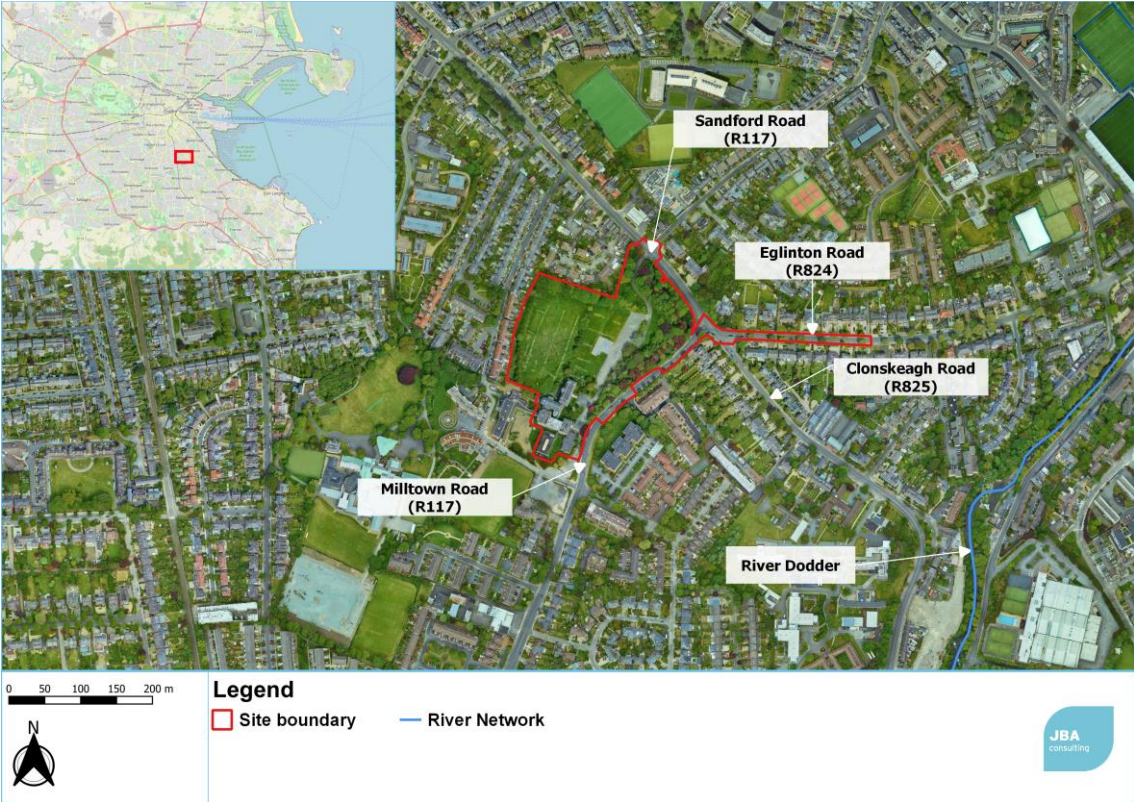


Figure 8.1: Site Location

(Source: Google Maps)



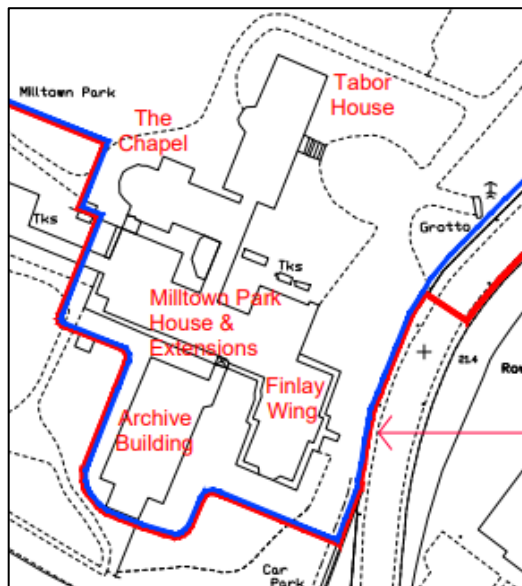


Figure 8.2: Existing buildings on site

(Source: O' Mahony Pike Architects)

## 8.2 The Proposed Development (the 'Project')

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

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

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

3 No. storeys in height and will comprise 28 No. Build-to-Sell duplex units and apartments; Block F will range in height from 5 No. storeys to part 7 No. storeys and will comprise 92 No. Build-to-Rent apartments; and the refurbished Tabor House (4 No. storeys including lower ground floor level) will comprise 24 No. Build-to-Rent apartments.

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

The proposed works also include a new 2.4 metre high boundary wall across the site from east to west (towards the southern boundary) requiring the demolition of a portion of the red brick link building that lies within the subject site towards the south-western boundary (36.4 sq m) and the making good of the façade at the boundary. The existing Link Building is the subject of a separate application for permission (DCC Reg. Ref. No. 3866/20) that includes a request for permission to demolish that Link Building, including the part of the building on the lands the subject of this application for SHD permission. If that application is granted and first implemented, no demolition works to the Link Building will be required under this application for SHD permission. If that application is refused permission or not first implemented, permission is here sought to demolish only that part of the Link Building now existing on the lands the subject of this application for permission and to make good the balance at the red line with a blank wall.

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

#### ***Drainage Network:***

During the operation phase the foul water drainage will be connected to the existing Dublin city combined sewers. The water will be treated at Ringsend Waste Water Treatment Plant (WWTP), which has the capacity of 1.64 million PE, before being discharged at Poolbeg, 1km from the plant.

Surface water sewers from the proposed development will discharge at attenuated flows to the existing drainage network on Eglinton Road (approximately 195m from the Sandford Road / Eglinton Road junction where the public line increases to a 300mm diameter pipe). In order to achieve the required drainage invert levels on site, approximately 160m of the existing drainage network along Eglinton Road will need to be replaced with a 300mm pipe running at a flatter gradient. The total length of the surface water outfall from the point it crosses the site boundary at Milltown Road to the discharge point on Eglinton Road is

approximately 300m. As noted in the DBFL Infrastructure Report enclosed separately, 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.

Surface water discharge rates from the proposed surface water drainage network will be controlled by a vortex flow control device (Hydrobrake or equivalent) and associated underground attenuation tanks (Stormtech Chambers or equivalent). Surface water discharge will also pass via a full retention fuel / oil separator (sized in accordance with permitted discharge rate from the site).

Any incidental surface water runoff generated from the basement carpark would drain through a separate system beneath the basement slab (out falling to the proposed foul drainage network via a petrol interceptor).

Sustainable Drainage Systems (SuDS) will be implemented on site to include green roofs, drainage board on podium deck, permeable paving, tree pits and attenuation in accordance with Greater Dublin Strategic Drainage Strategy (GDSDS) requirements.

### *Site Access Facilitating Works*

The primary access point for vehicles is off Milltown Road facilitating access to the basement carpark, the forecourt area adjacent to Tabor House and the duplex units along the western boundary. This access point also serves pedestrians and cyclists. This proposed site access shall operate as a priority junction with associated signage and line marking in accordance with the Department of Transport's Traffic Signs Manual. A Toucan Crossing is also proposed in the vicinity of the Milltown Road access to improve facilities for vulnerable road users.

A secondary access point for vehicles is located at the existing entrance from Sandford Road which facilitates access to the area adjacent to Block A (principally for deliveries, taxi pick up / drop off and disabled parking) as well as fire tender access to the northern end of the site. This access point also serves pedestrians and cyclists. As such, improvements to pedestrian facilities at the Sandford Road / Belmont Avenue junction are proposed (upgrading of the existing pedestrian crossing on Sandford Road, amendments to line marking at the junction, improved tactile paving and reduction of corner radii).

#### **8.2.1 Construction Schedule**

The construction programme is approximately 34 months for the construction phase.

The proposed phasing of the works is summarised below.

- Phase 1 – Enabling works, demolitions.
- Phase 2 – Basement Box
- Phase 3 – Block D & F Apartment blocks, Tabor House, Chapel and Duplexes
- Phase 4 – Block A1, A2, B and C

#### **8.2.2 Construction Operations**

The standard strip and pad foundations and basement excavation/construction shall be executed as follows:

- Excavate to foundation/basement formation level forming slope batters as necessary.
- Cast the reinforced concrete pad and strip footings, rising walls and ground floor slabs.
- Cast the basement to ground level reinforced concrete retaining walls, columns and lift, stair, shear walls.
- Cast the reinforced concrete ground slabs.
- Backfill to ground level the surrounding slope batters using granular material as appropriate.

### *Temporary Ground Retention Works*

Temporary sheet piling on site in discrete areas where the space for slope battering is not available will most likely be necessary. Steel sheet piles are driven into the ground using a piling hammer to facilitate vertical excavation on one side. The steel sheet piles are extracted and reused once the permanent works are complete and backfilled.

A temporary sheet pile is manufactured from interlocking lengths of profiled steel sheets which can be extracted once their temporary purpose has been served and the surrounding ground backfilled or permanent basement structure is complete. The extraction is achieved by clipping the extractor tool through punched holes in the top of the sheet piles and then using the piling rig to withdraw the sheet pile from the earth.

### *Other Solutions*

Alternative foundation solutions under consideration for this project are noted below:

#### Augered Bored Piles

- Bored piles are cylindrical shaped shafts formed in the ground by extracting soil and replacing it with concrete and steel reinforcement cages. Augered bored piles can transfer large loads to the very stiff clay encountered during site investigation works.
- Because of the depth to a suitable bearing stratum beneath Blocks D and Block F is 2.5m below ground level, bulk excavation is required with foundations extending to the required depth. For the foundation design of these blocks, augered piles will most likely be considered a more appropriate foundation solution than standard deep strip and pads. In the case of augered piles the building will be supported on a system of ground beams, pile caps and suspended slabs supported on the piles. The piles themselves will be augered approximately 6-10m into the very stiff clays to gain capacity through a combination of end bearing and friction along the pile shaft.
- In the case of the basement under Block A, Block B and Block C piles are not required to reach the very stiff clay layer as the excavation is at sufficient deep.

#### Driven Piles

- Driven piles as with the bored piles transfer large loads to the very stiff clay encountered during site investigation works. Driven piles can be formed in pre-cast concrete typically in square or cylindrical cross section which are percussion driven into the ground displacing the soil as it advances. As such there are no pile arisings to be dealt with but the noise and vibration are considerably more onerous compared with augered bored piles.

#### Ground Improvement

- Ground improvement techniques will most likely be required for the Block E duplex houses. The following options are considered:
  - Suitable bearing stratum can be achieved by extending standard strip footings into the upper firm clays for the low-rise houses. However, should this situation change during construction, the following ground improvement technique may also be considered;
  - Lime stabilization is the mixing of quicklime with soft, fine grained soils to improve the shear strength and deformation characteristics of the soil. By a process of reduce digging to a suitable bearing strata and reinstating the existing ground with lime mixed with the soil and well compacted in layers, provides a suitable bearing strata at a higher level for proposed foundations. Standard pad and strip footings can then be installed in the improved ground at shallower depth than might be necessary using bulk excavation and infilling.

#### *Water Drainage During Construction*

During construction, surface water will be managed as follows:

- Weather conditions and typical seasonal weather variations will also be taken account of when planning stripping of topsoil and excavations with an objective of minimizing soil erosion.
- All oils, fuels, paints and other chemicals will be stored in a secure bunded hardstand area. Refuelling and servicing of construction machinery will take place in a designated hardstand area which is also remote from any surface water inlets (where not possible to carry out such activities off site).
- Concrete batching will take place off site and wash down and wash out of concrete trucks will take place off site (at authorized concrete batching plant in full compliance with relevant planning and environmental consents).
- The construction compound will include adequate staff welfare facilities including foul drainage and potable water supply. Foul drainage discharge from the construction compound will be tankered off site to a licensed facility until a connection to the public foul drainage network has been established.

These measures are best practice measures and in line with the Greater Dublin Regional Code of Practice for Drainage Works (Dublin City Council, 2021). The first objective of the Code of Practice is Compliance with best environmental practices and relevant environmental legislation such as the Water Framework Directive.

### **8.3 Assessment Methodology**

The assessment considers the works related to the construction phase of the development, taking into account different options of construction methodology,



and the operational phase of the development. The assessment methodology of this chapter is outlined in the sections below.

### 8.3.1 Relevant Policies and Plans

The policy documents to which this assessment has had regard include the following:

- National Biodiversity Action Plan 2017-2021
- Ireland's National Strategy for Plant Conservation – progress towards 2020
- Dublin City Biodiversity Action Plan 2015-2020
- Dublin City Development Plan 2016-2022

### 8.3.2 Guidance

The guidance documents that have been taken into account in conducting this assessment include the following:

- OPR Practice Note PNo2 Environmental Impact Assessment Screening (OPR, June 2021).
- Guidelines for planning authorities and An Board Pleanála on carrying out environmental impact assessment (Department of Housing, Planning and Local Governments, August 2018).
- Guidelines for Ecological Impact Assessment in the United Kingdom and Ireland: Terrestrial, Freshwater, Coastal and Marine. Chartered Institute of Ecology and Environmental Management, (CIEEM, 2018).
- Guidelines on the information to be contained in Environmental Impact Assessment Reports (Draft) Environmental Protection Agency (EPA, 2017).
- Guidelines for Assessment of Ecological Impacts of National Road Schemes (NRA, 2009a).
- Environmental Impact Assessment of National Road Schemes – A Practical Guide (NRA, 2008b).
- Best Practice Guidance for Habitat Survey and Mapping. The Heritage Council. (Smith et al., 2011b).
- Bat Surveys for Professional Ecologists: Good Practice Guidelines (3<sup>rd</sup> edition) (Collins, 2016).
- Bat Mitigation Guidelines for Ireland (Kelleher and Marnell, 2006).
- Guidance Note 08/18. Bats and Artificial Lighting in the UK - Bats and the Built Environment series (ILP, 2018).
- Guidelines on The Management of Noxious Weeds and Non-native Invasive Plant Species on National Roads (NRA, 2010).

### 8.3.3 Designated Nature Conservation Sites

Sites of international importance including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) are collectively known as Natura 2000 sites. These sites contain examples of some of the most important natural and semi-natural ecosystems in Europe. Designated sites, which also include Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs), which are national designations, were also identified within the proposed development's area of influence. The Zone of Influence (Zoi) for designated sites is defined by the presence of pathways; surface water, groundwater and land & air pathways. For groundwater and land & air pathways a 15km distance from the development was used to identify Natura 2000 sites and a 10km distance was used to identify pNHAs/NHAs. The ultimate discharge location for foul water produced on site is at Ringsend Waste Water Treatment Plant's (WWTP) discharge location and a 15km search distance from this location as well as the proposed development location was used to identify all designated sites with potential surface water pathway.

### 8.3.4 Screening of Ecological Features

The ecological features identified during the walkover surveys and from desk-based assessments were reviewed.

An informal screening process is presented at the start of the results section to ensure that the assessment focuses only on features where the impact could have important consequences for biodiversity (valued ecological features). Any features which are important beyond the site level were identified for further evaluation. Ecological features with little or no value beyond the site level were screened out and a short statement explaining this is given in the screening section.

A separate Appropriate Assessment (AA) Screening Report has been produced (JBA, 2021), to assess the potential for effects on Designated Natura 2000 sites. The Hydrological and Hydrogeological Qualitative Risk Assessment prepared by AWN Consulting assisted this assessment (provided in Appendix 8.1). The AA Screening Report concluded there will be no likely significant effects on any European Natura 2000 sites arising from the proposed development, either alone or in-combination with other plans or projects. Natura 2000 sites are therefore not considered further in this Chapter.

## 8.4 Assessment of the Effects on Features

Ecological features include nature conservation sites, habitats, species assemblages/communities, populations or groups of species. The assessment of the significance of predicted impacts on ecological features is based on both the 'value' of a feature, and the nature and magnitude of the impact that the project will have on it. The impact is based on the project which includes a certain amount of designed-in mitigation, including construction best practice measures that will be implemented with a high degree of certainty.

### 8.4.1 Valuation of Receptors

The value of designated sites, habitats and species populations is assessed with reference to:

- Their importance in terms of 'biodiversity conservation' value (which relates to the need to conserve representative areas of different habitats and the genetic diversity of species populations).

- Any social benefits that habitats and species deliver (e.g. relating to enjoyment of flora and fauna by the public).
- Any economic benefits that they provide.

The valuation of designated sites considers different levels of statutory and non-statutory protection. Assessment of habitat depends on several factors, including the size of the habitat, its conservation status and quality. The assessment also takes account of connected off-site habitat that has the potential to increase the value of the on-site habitat through association. Valuation of species depends on a number of factors including distribution, status, rarity, vulnerability, and the population size present.

Designated sites, habitats and species populations have been valued using the scale in Table 8.1.

**Table 8.1: Examples of criteria used to define the value of ecological features**

Level of Value	Examples of Criteria
International	<p>An internationally important site e.g. Special Protection Area (SPA), Special Area of Conservation (SAC), Ramsar (or a site considered worthy of such designation).</p> <p>A regularly occurring substantial population of an internationally important species (listed on Annex IV of the Habitats Directive).</p> <p>Designated shellfish waters.</p> <p>Major fisheries area.</p>
National	<p>A nationally designated site e.g. Natural Heritage Area (NHA), a proposed Natural Heritage Area (pNHA), statutory Nature Reserve, or a site considered worthy of such designation.</p> <p>A viable area of a habitat type listed in Annex I of the Habitats Directive or of smaller areas of such habitat which are essential to maintain the viability of a larger whole.</p> <p>A regularly occurring substantial population of a nationally important species, e.g. listed on The Wildlife Act 1976 or The Wildlife (Amendment) Act 2000.</p> <p>A species included in the Irish Red Data Lists/Books.</p> <p>Significant populations of breeding birds.</p>
Regional/County (Co. Dublin)	<p>Species and habitats of special conservation significance within County Dublin, as identified in Dublin City Biodiversity Action Plan 2015-2020.</p> <p>An area subject to a project/initiative under the County's Biodiversity Action Plan.</p> <p>A regularly occurring substantial population of a nationally scarce species.</p>
Local (works site and its vicinity)	<p>Areas of internationally or nationally important habitats which are degraded and have little or no potential for restoration.</p> <p>A good example of a common or widespread habitat in the local area.</p> <p>Species of national or local importance, but which are only present very infrequently or in very low numbers within site area.</p>
Less than local	<p>Areas of heavily modified or managed vegetation of low species diversity or low value as habitat to species of nature conservation interest.</p> <p>Common and widespread species.</p>

### 8.4.2 Descriptive Terminology

Ecological effects or impacts can be described and categorised in a number of ways. Examples of relevant terms are listed in the table below.

**Table 8.2: Categories of Effects (derived EPA, 2017).**

<b>Quality of Effects</b>	<p><b>Positive Effects</b> A change which improves the quality of the environment (for example, by increasing species diversity; or the improving reproductive capacity of an ecosystem, or by removing nuisances or improving amenities).</p>
	<p><b>Neutral Effects</b> No effects or effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error</p>
	<p><b>Negative/adverse Effects</b> A change which reduces the quality of the environment (for example, lessening species diversity or diminishing the reproductive capacity of an ecosystem; or damaging health or property or by causing nuisance).</p>
<b>Probability of Effects</b>	<p><b>Likely Effects</b> The effects that can reasonably be expected to occur because of the planned project if all mitigation measures are properly implemented.</p>
	<p><b>Unlikely Effects</b> The effects that can reasonably be expected not to occur because of the planned project if all mitigation measures are properly implemented.</p>
<b>Duration and Frequency of Effects</b>	<p><b>Temporary Effects</b> Effects lasting less than a year</p>
	<p><b>Short-term Effects</b> Effects lasting one to seven years</p>
	<p><b>Medium-term</b> Effects Effects lasting seven to fifteen years</p>
	<p><b>Long-term Effects</b> Effects lasting fifteen to sixty years.</p>
<b>Types of Effects</b>	<p><b>Indirect Effects</b> (a.k.a. Secondary Effects) Impacts on the environment, which are not a direct result of the project, often produced away from the project site or because of a complex pathway.</p>
	<p><b>Cumulative Effects</b> The addition of many minor or significant effects, including effects of other projects, to create larger, more significant effects.</p>
	<p><b>'Do-Nothing Effects'</b> The environment as it would be in the future should the subject project not be carried out.</p>
	<p><b>'Worst case' Effects</b> The effects arising from a project in the case where mitigation measures substantially fail.</p>
	<p><b>Residual Effects</b> The degree of environmental change that will occur after the proposed mitigation measures have taken effect.</p>
	<p><b>Synergistic Effects</b> Where the resultant effect is of greater significance than the sum of its constituents,</p>

These effects are assessed together to determine the magnitude of the impact on the status of a habitat or species population, and on the integrity of the site that supports them. Professional expertise is then used to assign the impacts on the receptors to one of four classes of magnitude, detailed in Table 8.3.

**Table 8.3: Definition of magnitude.**

Magnitude	Definition
High	An irreversible or long-term impact on the integrity of a site or conservation status of a habitat, species assemblage/community, population, or group. If adverse, this is likely to threaten its sustainability; if beneficial, this is likely to enhance its conservation status.
Medium	A medium to long-term impact on the integrity of a site or conservation status of a habitat, species assemblage/community, population, or group, which if adverse, is unlikely to threaten its sustainability (or if beneficial, is likely to be sustainable but is unlikely to enhance its conservation status).
Low	A short-term but temporary impact on the integrity of a site or conservation status of a habitat, species assemblage/community, population or group that is within the range of variation normally experienced between years.
Negligible	A short-term but temporary impact on the integrity of a site or conservation status of a habitat, species assemblage/community, population or group that is within the normal range of annual variation.

### 8.4.3 Significance of impacts

The significance of an impact is a product of the value of the ecological feature and the magnitude of the impact on it, moderated by professional judgement. Table 8.4 shows a matrix which is used for guidance in the assessment of significance, with impacts being considered to be of major, moderate or minor significance, or negligible. Impacts can also either be assessed as positive or negative using the same matrix.

**Table 8.4: Significance of impacts matrix.**

Value of feature	Magnitude of impact			
	High	Medium	Low	Negligible
International	Major	Major	Moderate	Neutral
National	Major	Moderate	Minor	Neutral
Regional / County	Moderate	Minor	Minor	Neutral
Local	Minor	Minor	Negligible	Neutral
Less than local	Negligible	Negligible	Negligible	Neutral

### 8.4.4 Residual Impacts

The project is assessed including some designed-in mitigation. This is done where mitigation is proven to be effective and will be implemented effectively with a high certainty. Where significant residual impacts are still identified, further mitigation measures will be proposed as part of the EIA process to avoid, reduce or minimise them. Each impact assessment section assigns a final significance level to the impact described, which considers and includes the implementation of any stated mitigation measures; these are the residual impacts.

### 8.4.5 Baseline

To determine the baseline conditions at the site a review of all available information was made. When determining the pre- work conditions on-site, including the presence or absence of protected habitats and/or species, the precautionary principle was used where limited information was available. The following information was consulted during this process:



- A desk-based assessment was carried out to collate information regarding protected/notable species and statutorily designated nature conservation sites in, or within close proximity to, the study area.
- A data search for protected and notable species was conducted using the National Biodiversity Data Centre Mapping System (NBDC, 2020). Two 10km grid squares (O12 and O13) were used to encompass the study area and species records were extracted from the map at a 10km<sup>2</sup> resolution.
- Information for statutory designated sites including Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Ramsar Sites, Natural Heritage Areas (NHAs) and proposed NHAs (pNHA) was collected from the online resources provided by the National Parks and Wildlife Service (NPWS, 2019) .

Other information on the local area was obtained, including:

- Environmental Protection Agency online databases on water quality (Available online at <https://gis.epa.ie/EPAMaps/>);
- Aerial photography available from [www.osi.ie](http://www.osi.ie) and Google Maps <http://maps.google.com/> ;
- Online data available on Natura 2000 sites as held by the National Parks and Wildlife Service (NPWS) from [www.npws.ie](http://www.npws.ie); Accessed January 2021.;
- All Ireland Red Data lists for vascular flora, mammals, butterflies, non-marine molluscs, dragonflies & damselflies, amphibians and fish;
- Water Framework Directive water maps (available online at <http://www.wfdireland.ie/maps.html> and <https://www.catchments.ie/>); and
- International Union for Conservation of Nature and Natural Resources (IUCN) Red List of Threatened Species (available online at <http://www.iucnredlist.org>).

#### 8.4.6 Zone of Influence

The Zol for the project is based on a determination of the likely extent of the ecological impacts. This will vary for different ecological features, depending on their sensitivities to environmental change. For the majority of the project, impacts will be limited to within the site boundary. However, for impacts relating to airborne emissions, surface and ground water and disturbance, the Zol is extended. For groundwater and land & air pathways a 15km distance from the development was used to identify Natura 2000 sites and a 10km distance was used to identify pNHAs/NHAs. The ultimate discharge location for foul water produced on site is at Ringsend WWTP discharge location and an additional 15km search distance from this location, as well as the proposed development location, is used to identify all designated sites with potential surface water pathway. These are standard Zol to apply.

#### 8.4.7 Field Surveys

Several surveys have been carried out to inform this report. The first ecological walkover survey was conducted on 03/12/2019 by Niamh Burke and Malin Lundberg, Ecologists with JBA Consulting, to inform the ecological baseline of the site. The survey recorded habitats and flora in the area within the development site, and to detect the presence or likely presence of protected species (fauna and flora), and the presence of good potential habitat for those species. The study was also concerned with recording habitats suitable for protected habitats and species and identifying the need for further, more specialist surveys where necessary. The findings from the first ecological walkover were subsequently confirmed when carrying out further three site visits during the summer months (20/05/2020, 15/06/2020 and 16/07/2020) which complemented the initial site visit and any new findings were recorded. Habitat surveys followed guidance provided in Best Practice Guidance for Habitat Survey and Mapping, by the Heritage Council (Smith et al. 2011).

Bird surveys were carried out 13/03/2020 and 23/03/2020 and during the winter months 2020/2021 including four visits on 30/11/2020, 17/12/2020, 07/01/2021 and 03/02/2021. The survey methodology followed the guidance provided by NRA (2009b). Each survey was three hours long. The survey was carried out to assess birds using the site during the winter period and focused on recording birds present on site and birds in flight nearby to the site, with particular focus on the potential presence of Light-bellied Brent Goose *Branta bernicla hrota* and other wintering birds known to feed on inland grasslands. The surveys were undertaken during high tide as wintering birds are most likely to utilise terrestrial habitats for grazing during this time. During the months of January and February 2021, surveys were undertaken both at high and low tide, as Brent Goose are known to move inland when resources are low in estuaries during these months. All bird species noted within the site were recorded during the above mentioned site visits.

Breeding bird surveys were carried out on 15/04/2021 and 18/05/2021, following guidance provided in Country Bird Survey (CBS) Manual (BWI, 2012). The first survey involved walking transects around the whole site and recording bird species and their activity, e.g. singing, bringing food to nest, carrying nest material, occupying nest. The second survey involved inspecting the buildings for nests of Swallow *Hirundo rustica*, Swift *Apus apus* and House Martin *Delichon urbicum* and using focal points to identify if any birds were nesting on the rooftops.

Bat emergence surveys and transect surveys were carried out at three occasions during the active bat season: 20/05/2020, 15/06/2020 and 16/07/2020. The surveys were carried out at dusk, starting 15 minutes before sunset and undertaken for 1.5-2 hours. Handheld bat detectors (Magenta 5 Heterodyne) were used for identifying bats. This data was recorded, and visual observations were noted throughout the surveys to identify usage of the site by bats. At each survey occasion, a static bat detector was installed and left for five nights to record bat activity. On the 16<sup>th</sup> July, two static detectors were installed. A static detector was also installed between 19<sup>th</sup>-23<sup>rd</sup> August. Data collected by the static bat detectors was analysed by Malin Lundberg and William Mulville using AnalookW software, with all results checked for quality control by JBA Bat Specialist Tanya Slattery. Bat surveys followed guidance provided in Bat Surveys for Professional Ecologists (Collins, 2016).

The Survey methods were in general accordance with those outlined in the following documents:

- Best Practice Guidance for Habitat Survey and Mapping, by the Heritage Council (Smith et al. 2011);
- Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes (NRA, 2009b);
- Bat Surveys for Professional Ecologists (Collins, 2016);
- CBS Manual - Guidelines for Countryside Bird Survey participants (BWI, 2012);

Aerial photographs and site maps assisted the habitat survey. Habitats have been named and described following A Guide to Habitats in Ireland by Fossitt (2000). Nomenclature for higher plants principally follows that given in Webb's An Irish Flora (Parnell and Curtis, 2012).

## 8.5 Constraints

The conclusion of this report necessarily relies on some assumptions and it is inevitably subject to some limitations. These would not affect the conclusion but the following points should be taken into consideration during the assessment to ensure the basis of the assessment is clear:

- Data from biological records centres or online databases is historical information, and datasets might be incomplete, inaccurate or missing. It is important to note that even where data is held, a lack of records for a defined geographical area does not necessarily mean that the species is absent; the area may simply be under-recorded;
- This assessment is based on the methodology for proposed works as described in this report. Where changes to methodology occur, an ecologist will be consulted to determine if the changes need reassessment.

The impact assessment and design of mitigation measures will take all the above limitations into consideration.

## 8.6 Baseline Conditions

The baseline conditions are based on present information gathered from existing reports and desk-based sources as detailed in Section 8.4.5 and a range of site visits undertaken 2019-2021 (see details in Section 8.4.7).

### 8.6.1 Desk-based Assessment

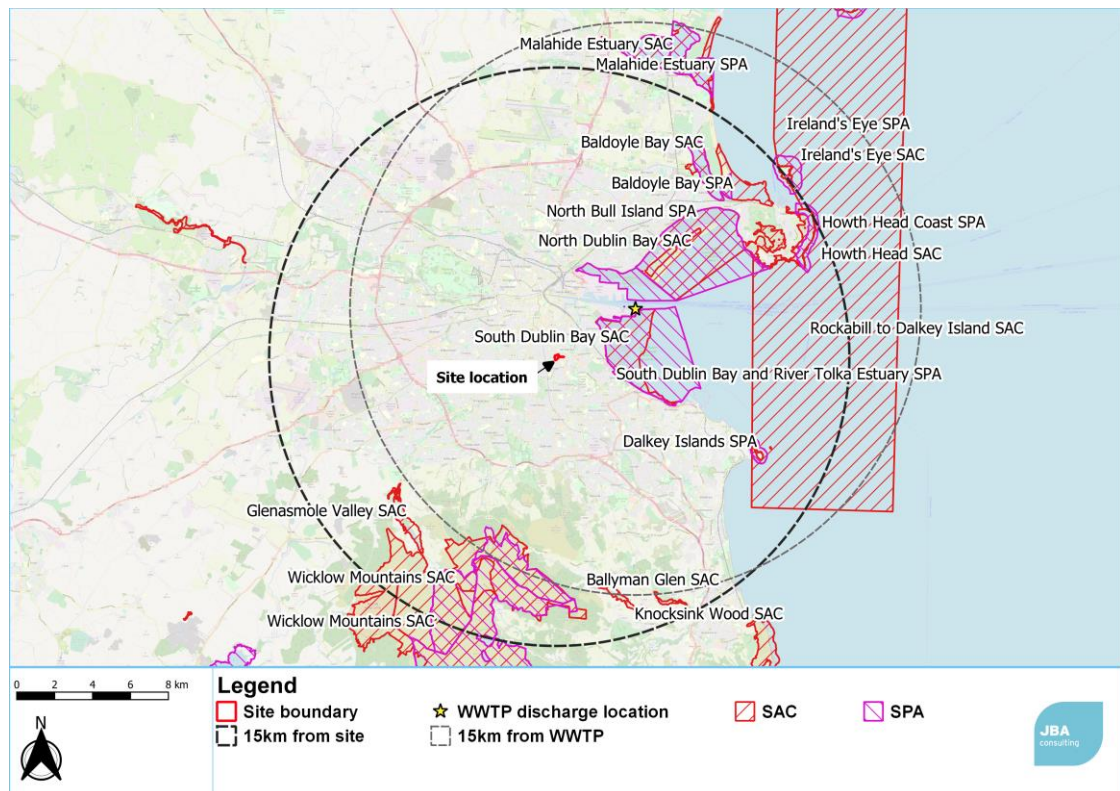
#### 8.6.1.1 Natura 2000 sites

Natura 2000 sites identified as occurring within the ZOI of the project:

- South Dublin Bay and River Tolka Estuary SPA (004024)
- South Dublin Bay SAC (000210)
- North Bull Island SPA (004006)
- North Dublin Bay SAC (000206)
- Baldoyle Bay SAC (000199)
- Baldoyle Bay SPA (004016)
- Howth Head SAC (000202)
- Howth Head Coast SPA (004113)
- Rockabill to Dalkey Island SAC (003000)
- Dalkey Islands SPA (004172)
- Wicklow Mountains SAC (002122)
- Wicklow Mountains SPA (004040)
- Glenasmole Valley SAC (001209)
- Irelands Eye SPA (004117)
- Ireland's Eye SAC (002193)
- Knocksink Wood SAC (000725)
- Ballyman Glen SAC (000713)
- Malahide Estuary SAC (000205)
- Malahide Estuary (002025)

The proposed site is located outside the boundary of these Natura 2000 sites (Figure 8.3). A separate Appropriate Assessment (AA) Screening report (JBA, 2021) has been produced

which examines the likely pathways and impacts of the proposed works on any of these Natura 2000 sites.



**Figure 8.3: Natura 2000 sites within 15km of the proposed development**

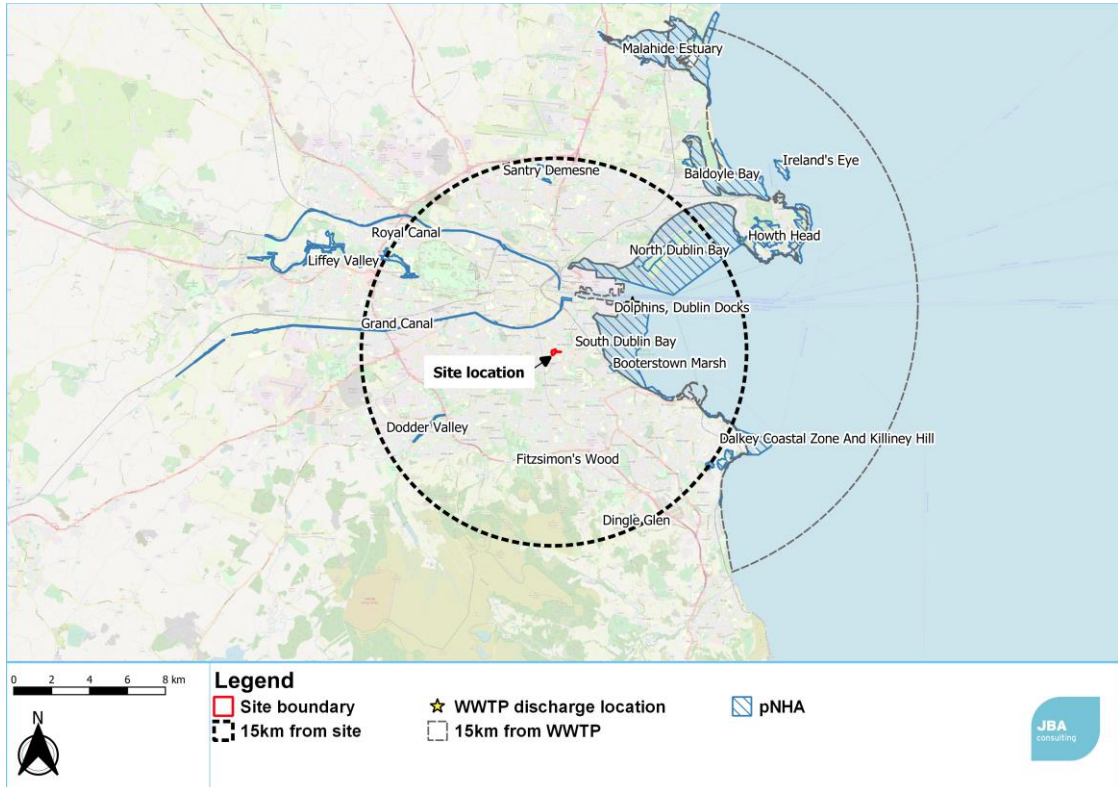
(Source: NPWS, 2019)

### 8.6.1.2 Natural Heritage Areas

There are 16 pNHAs and no NHAs located within the Zol of the site (Table 8.5 and Figure 8.4). Of these 16 sites, seven are within a Natura 2000 designated site. These are North Dublin Bay pNHA, South Dublin Bay pNHA, Booterstown Marsh pNHA, Howth Head pNHA, Baldoye Bay pNHA, Ireland's Eye pNHA and Malahide Estuary pNHA which are within North Dublin Bay SAC, North Bull Island SPA, South Dublin Bay and River Tolka Estuary SPA, South Dublin Bay SAC, Howth Head SAC, Baldoye Bay SAC, Ireland's Eye SPA and Malahide Estuary SAC. North Dublin Bay pNHA, South Dublin Bay pNHA, Howth Head pNHA, Baldoye Bay pNHA, Ireland's Eye pNHA and Malahide Estuary pNHA have the same receptors as their respective SACs and SPAs. The AA screening (JBA, 2021) has identified the presence of surface water pathway during construction and operation where surface water will be discharged to the surface water network and foul water will be treated at Ringsend WWTP. The surface water network discharges to River Dodder which connects to River Liffey further downstream and eventually reaches Dublin Bay. However, the AA Screening concludes that, in line with the Hydrology and Hydrogeology Qualitative Risk Assessment provided by AWN Consulting which states "there are no pollutant linkages as a result of the construction or operation of the Proposed Development which would have an appreciable effect on water quality impact at the Natura sites within Dublin Bay", the proposed development will not impact on the Natura 2000 sites via surface water pathway. Further, due to the site location and distance to the Natura 2000 sites, prevailing winds, aquifer vulnerability (low) and the nature and scale of the proposed project, impacts are not anticipated on any of the Natura 2000 sites. As the pNHAs have the same receptors, these are covered by the assessment in the AA Screening report and are not considered to be impacted. The other pNHA sites are assessed below.

**Table 8.5: pNHAs within Zol of the site and requirement for further assessment.**

pNHA Site code	pNHA Site name	Distance from site (km)	Screening
002104	Grand Canal	1.5	Out
000210	South Dublin Bay	2.4	ut, covered in separate AA Screening report
001205	Boosterstown Marsh	2.9	carried forward
002103	Royal Canal	3.1	Out
000201	Dolphins, Dublin Docks	4.0	in carried forward
000206	North Dublin Bay	4.3	out, covered in separate AA Screening report
001753	Fitzsimon's Wood	5.3	out
000991	Dodder Valley	6.5	carried forward
000128	Liffey Valley	8.0	out
001206	Dalkey Coastal Zone And Killiney Hill	8.1	in
000178	Santry Demesne	8.7	out
001207	Dingle Glen	9.4	out
000202	Howth Head	11.3	out, covered in separate AA Screening report
000199	Baldoyle Bay	11.5	out, covered in separate AA Screening report
000203	Ireland's Eye	14.8	out, covered in separate AA Screening report
000205	Malahide Estuary	15.0	out, covered in separate AA Screening report



**Figure 8.4: proposed Natural Heritage Areas (pNHA) within Zol of the proposed development**

(Source: NPWS, 2019)



Grand Canal pNHA is partly within the same sub-catchment as the proposed site, however it lacks a surface water connection and is thus not considered to be impacted by the proposed works. Therefore, Grand Canal is not considered further in this report.

Boosterstown Marsh pNHA is important for its saltmarsh habitat and is of local and regional ornithological importance and is used as a high-tide roost by a variety of waders and gulls. The site lies within the same sub-catchment as the proposed site. As the site is located in Dublin Bay which is the recipient of the surface water from the site, it has the potential to be impacted via surface water pathways and is therefore assessed further in this report.

The Dolphins, Dublin Docks pNHA is located at the outlet of River Liffey to Dublin Bay. The site is small and includes two mooring 'dolphins' near Pigeon House Harbour. The site is used by nesting terns, approximately 350 pair of Common Terns were recorded in 2006 (Dublin City Council, 2008). As the site is located in Dublin Bay which is the recipient of the surface water from the site, it has the potential to be impacted via surface water pathways and is therefore assessed further in this report.

Dalkey Coastal Zone and Kiliney Hill pNHA includes both the islands, the sound and the coastal part around Dun Laoghaire. The site is a potential recipient of surface water from the site via discharge from Ringsend WWTP. Therefore, Dalkey Coastal Zone and Killiney Hill is assessed further in this report.

Dodder Valley pNHA is located south-west from the proposed development. The site contains a mix of habitats, including woodland scrub with well-developed understorey, wildflower meadows along the riverbanks and the river habitat. The site supports 48 species of birds and a Sand Martin *Riparia riparia* colony of up to 100 pairs are nesting in one section of the banks. The site lies within the same sub-catchment, upstream of the proposed development. The loss of connectivity with upstream sites could impact on species and habitats within Dodder Valley pNHA. The connectivity is being reduced by the continued urban development. Therefore, Dodder Valley is considered further in this report.

The Royal Canal pNHA and Liffey Valley pNHA are located north-west of the proposed development. The Royal Canal is a man-made watercourse and the site includes both the central channel and the bank sides. The legally protected Opposite-leaved Pondweed *Groenlandia densa* (Flora Protection Order 1987) is present at one site in Dublin. Liffey Valley includes the river and the low hills of which it meanders through. Both of these sites are located in separate sub-catchments from the proposed development and are lacking surface water connection. Therefore, Royal Canal and Liffey Valley are not considered further in this report.

The following pNHA sites: Fitzsimon's Wood, Santry Demesne and Dingle Glen are all woodland habitats and the only potential connection with the site would be via air pathways. Given the distance and type of habitats, these sites are not considered to be within the Zol. Therefore, Fitzsimon's Wood, Santry Demesne and Dingle Glen are not considered further in this report.

### 8.6.1.3 Other Designations of Sites

North Dublin Bay SAC (000206) is also a designated national nature reserve 'North Bull Island'. North Bull Island is also a Ramsar Wetland site. Another Ramsar Wetland site in Dublin Bay is Sandymount Strand/Tolka Estuary. Dublin Bay, including green space in the city, is a designated UNESCO Biosphere (Dublin City Council, 2016).

#### 8.6.1.4 Protected Species

Records of protected fauna including birds, amphibians, fish and mammals collated from the National Biodiversity Data Centre (NBDC, 2019) database, present within the 10km grid squares during the past 10 years are listed in Appendix 8.2. This table includes their level of protection, if they are red or amber listed on the International Union for the Conservation of Nature and Natural Resources (IUCN) Red List and the date of the last record of this species at this location.

#### 8.6.1.5 Invasive Non-native Species

The Records of Invasive Non-Native Species (INNS) collated from the NBDC (2019) database, present within the 10km grid square during the past 10 years are listed in Appendix 8.2. Many species have been recorded, the majority being flora, but several mammals have also been recorded.

### 8.7 Aquatic Habitat – On and Off-site Receptors

The proposed development site lies within the Water Framework Directive (WFD) Liffey and Dublin Bay Catchment. Water bodies near the site are seen in Figure 8.5.

The closest waterbody to the site is the River Dodder which lies 0.5km to the east of the site, where it flows in a north-easterly direction to enter the River Liffey at Ringsend, just west of Tom Clark Bridge. The Poddle River (Poddle\_010) lies approximately 2.5km to the west of the site, and which flows northwards into the River Liffey. The River Liffey lies 3.3km to the north of the site and flows in an easterly direction eventually reaching Dublin Bay at Ringsend. The Grand Canal lies approximately 1.6km to the north of the site. It enters the River Liffey at Grand Canal Dock, Ringsend.

Both Dodder and Liffey are of highly significant regional salmonid catchments (Dublin City Council, 2016). The fish survey carried out for the WFD in 2011 in the Eastern River Basin District surveyed at four locations in River Dodder, two of these were in the vicinity of the site of the proposed development: Mount Carmel (upstream) and Beaver Row (downstream) (Kelly *et al.* 2012). At the site of Mount Carmel, a total of 5 fish species were recorded including Brown Trout *Salmo trutta*, European Eel *Anguilla anguilla*, Three-spined Stickleback *Gasterosteus aculeatus*, Stoneloach *Barbatula barbatula* and Minnow *Phoxinus phoxinus*. At the site of Beaver Row a total of 6 species were recorded. In addition to the five mentioned, Atlantic Salmon *Salmo salar* was also recorded in this location, and Sea Trout, which is a variety of Brown Trout, was also recorded. The presence of weirs upstream of Beaver Row causes a barrier for migrating Salmon.

Given the presence of surface water pathway between the site and aquatic receptors via the surface water network and River Dodder, potential impacts on aquatic receptors are considered further in the assessment.



Figure 8.5: Local waterbodies.

(Source: EPA, 2020)

### 8.7.1 Water Framework Directive

In response to the increasing threat of pollution and the increasing demand from the public for cleaner rivers, lakes and beaches, the EU developed the Water Framework Directive (WFD). This Directive is unique in that, for the first time, it establishes a framework for the protection of all waters including rivers, lakes, estuaries, coastal waters and groundwater, and their dependent wildlife/habitats under one piece of environmental legislation for all European member states.

The WFD (Directive 2000/60/EC) is a substantial piece of EU water legislation that came into force in 2000. The overarching objective of the WFD is for the water bodies in Europe to attain Good or High Ecological Status. The Environment Protection Agency (EPA) is the competent authority in Ireland responsible for delivering the WFD. River Basin Management Plans (RBMP) have been created which set out measures to ensure that water bodies in the country achieve 'Good Ecological Status'.

Good Ecological Quality will depend on the quality of the individual quality elements on which the Ecological status is scored; namely the biological, chemical and morphological condition in a particular water body. Any reduction in any of these elements will result in a reduction of the overall ecological status.

### 8.7.2 Water Framework Status and Objectives

It is understood that the River Basin Management Plan (2018-2021) has been adopted by all local authorities in order to achieve the aims of the WFD. The Plan sets out the new approach that Ireland will take to enhance protection, prevention, and monitoring of Irish waterbodies. The main actions include:

- Improve waste water treatment;
- Conservation and leakage reduction;
- Scientific assessment of water bodies and implementation of local measures;
- A new collaborative Sustainability and Advisory Support Programme;
- Dairy Sustainability Initiative;
- Development of water and planning guidance for local authorities;
- Extension of Domestic Waste Water Treatment Systems grant Schemes; and
- A new Community Water Development Fund

Regardless of their current quality, surface waters should be treated the same in terms of the level of protection and mitigation measures employed, i.e. there should be no negative change in status (refer to Section 8.7.3 and 8.7.4 outlining current status of surface water bodies and groundwater bodies).

### 8.7.3 Surface Water Body Status

The current WFD status (2013-2018) of River Dodder is 'Moderate' and has a WFD risk score of 'At Risk of not achieving good status' (EPA, 2021). This 'Moderate' classification status is related to its biological status (invertebrates and fish) and dissolved oxygen conditions (which fails in relation to its percentage saturation). All remaining chemical conditions are classified as 'good'. River Poddle has not been assigned a WFD status but is considered to be 'At Risk of not achieving good status' due to pressure from nutrients and diffuse urban sources of pollution.

The WFD transitional waterbody Liffey Estuary Lower has a WFT status (2013-2018) of 'Good' and Dublin Bay has a WFD status of 'Good'. The Liffey Estuary Lower has a WFD risk score of 'At Risk of not achieving good status' while the Dublin Bay waterbody has a WFD risk score of 'Not at risk'. The surface water quality data for the Liffey Estuary Lower and Dublin Bay (EPA, 2021) indicate that they are 'Unpolluted'. Under the 2015 'Trophic Status Assessment Scheme' classification of the EPA, 'Unpolluted' means there have been no breaches of the EPA's threshold values for nutrient enrichment, accelerated plant growth, or disturbance of the level of dissolved oxygen normally present.

### 8.7.4 Groundwater Body Status

The groundwater body which underlies the proposed works site is the Dublin Groundwater body (Code IE\_EA\_G\_008). Dublin Groundwater body has the WFD status (2013-2018) 'Good' with a current WFD risk score 'Under Review' (GSI, 2021). The bedrock aquifer is classified as 'Locally Important Aquifer – Bedrock which is Moderately Productive only in Local Zones'.

Aquifer vulnerability is a term used to represent the intrinsic geological and hydrological characteristics that determine the ease with which groundwater may be contaminated generally by human activities. The GSI (2021) guidance presently classifies the bedrock aquifer vulnerability in the region of the subject site as 'Low' which indicates a general overburden depth potential of >10m. This shows that the aquifer is naturally protected by low permeability glacial clays. The aquifer vulnerability class in the region of the site is presented in Figure 8.6 below.

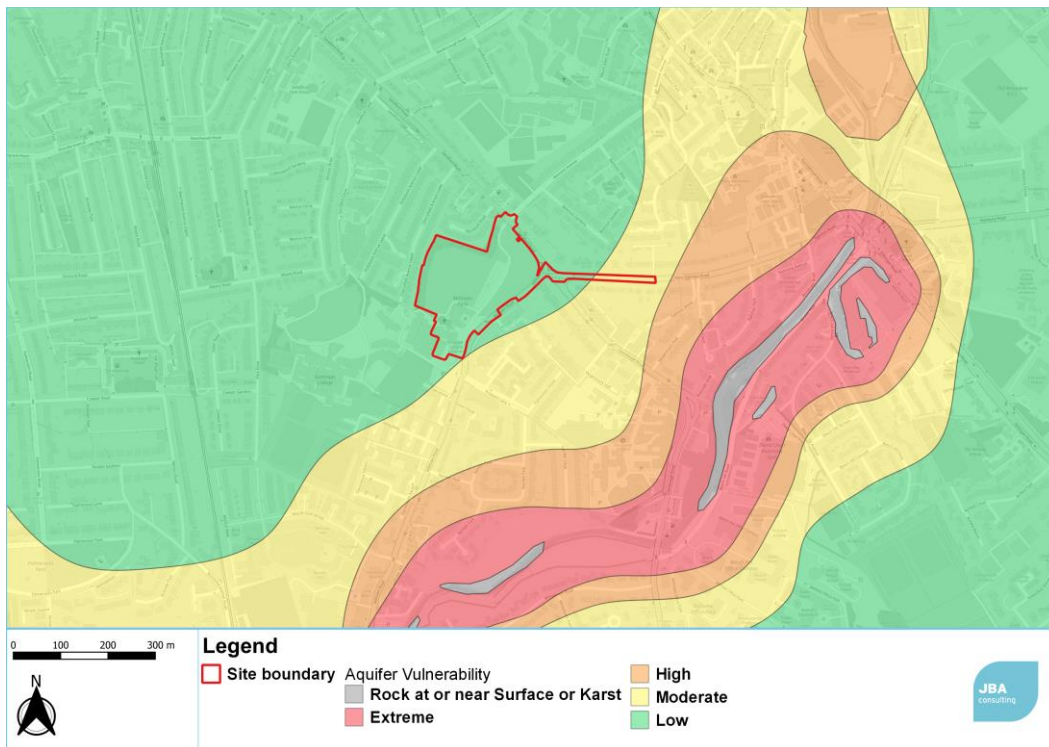


Figure 8.6: Aquifer vulnerability in the vicinity of the proposed development.

(Source: GSI, 2021)

## 8.8 Site Visit

The baseline surveys outlined in Section 8.4.7 have informed the descriptions of the existing environment. Habitats and species recorded are described and presented in detail in the following sections.

### 8.8.1 Habitats

The value of each habitat is based on the site visit and desktop study unless stated otherwise.

Habitats in and around the site boundary were recorded and are displayed in Table 8.6 and shown in Figure 8.7.

Table 8.6: Habitats recorded during site visit.

Habitat	Fossitt Code
Buildings and artificial surfaces	BL3
Amenity grassland (improved)	GA2
Mixed broadleaved/conifer woodland	WD2
Scattered trees and parkland	WD5
Treelines	WL2
Scrub	WS1
Ornamental/non-native shrub	WS3





**Figure 8.7:** Habitat at the proposed site including key features and invasive species found on site

(Source: Google Maps/JBA Consulting)

#### 8.8.1.1 Buildings and artificial surfaces – BL<sub>3</sub>

The existing buildings on site include the Chapel, the Archive, Milltown Park House and Tabor House (Figure 8.2). Artificial surfaces include the road leading to the main building, parking spaces and footpaths around the vicinity.

The Chapel and Tabor House have the potential to host bat roosts due to potential access points to the roof space of the building. These buildings are being retained. However, the buildings and artificial surfaces as habitats per se are not considered of ecological value and any potential impact on bats due to potential loss of bat roosts is considered separately under impacts on bats.

This habitat is considered to have less than local ecological importance.

#### 8.8.1.2 Amenity grassland (improved) – GA<sub>2</sub>

The amenity grasslands are in general low in species diversity. The grassland in the west part of the site has slightly more species than the rest of the amenity grassland (Figure 8.8). Grassland species include Common Daisy *Bellis perennis*, Cock's-foot *Dactylis glomerata*, False Oat-grass *Arrhenatherum elatius*, Creeping Buttercup *Ranunculus repens*, Ribwort Plantain *Plantago lanceolata*, Self-heal *Prunella vulgaris*, and Hogweed *Heracleum sphondylium*. Giant puffball *Calvatia gigantea* was recorded adjacent to the central treeline of Holly trees in the grassland area.

The north east part of the amenity grassland, next to the car park, has previously been used for temporary school buildings but is now recolonised. This area is dominated by grass species but also other opportunistic species.

This habitat is considered to have local (higher value) ecological importance.



Figure 8.8: Amenity grassland - winter 2019/2020 (left) and summer 2020 (right).

### 8.8.1.3 Mixed broadleaved/conifer woodland – WD2

There are two woodlands in the north and east within the site. These make part of the park area and have a mix of native and non-native species, indicating that it has been planted as part of the park, however the tree cover is varying in age with both mature trees and young saplings (Figure 8.9). The tree cover consists of Ash *Fraxinus excelsior*, Beech *Fagus sylvatica*, Sycamore *Acer pseudoplatanus*, Yew *Taxus baccata*, Holly *Ilex aquifolium*, Poplar *Populus* spp., Bay Laurel *Laurus nobilis*, Elder *Sambucus nigra*, Leyland cypress *Cupressus x leylandii*, Scots Pine *Pinus sylvestris*, and Elm *Ulmus* spp. The understorey consists of Bramble *Rubus fruticosus* agg., Ivy *Hedera hibernica*, Japanese Laurel *Aucuba japonica*, Herb Robert *Geranium robertianum*, Bluebell *Hyacinthoides* spp., Nettles *Urtica dioica*, Docks *Rumex* spp. and Lords and Ladies *Arum maculatum*.

The woodlands in the north and east holds a wide diversity of species and are present on historical maps (6 inch 1837-1842 (OSI, 2021)). The Dublin City Biodiversity Action Plan highlights woodlands roles as wildlife corridors within the City's green infrastructure network (Dublin City Council, 2016b). Therefore, this habitat is considered to be of regional importance.





Figure 8.9: Mixed woodland with Holly in the foreground.

#### 8.8.1.4 Scattered trees and parkland – WD5

In the north, next to the gate at Sandford Road, there is an area of the lawn with scattered early mature trees including Hazel *Corylus avellana*, Lime *Tilia* spp. and Sycamore (Figure 8.10). A beech hedge separates the area from the amenity grassland.

This habitat is considered to have less than local ecological importance.



Figure 8.10: Parkland with scattered trees.

#### 8.8.1.5 Treelines – WL2

There are several treelines on the site. One treeline bounds the entrance road with various tree species, one treeline consisting of Holly trees is located in the centre of the amenity grassland, a double treeline of Cherry *Prunus avium* trees is located along the western border of the site, and there is a small treeline with six Silver Birches *Betula pendula* in the southern most part of the amenity grassland just beside the archive building.

The Holly treeline consists of mature trees providing good cover for e.g. birds (Figure 8.11). The Holly treeline and the double treeline along the western border will be removed due to the development. The treelines on the site are of value for commuting mammals. The Dublin City Biodiversity Action Plan highlights the importance of trees and hedges as wildlife corridors and their role within the City's green infrastructure network. Therefore, the habitat is considered to be of regional importance.



Figure 8.11: Holly treeline.

#### 8.8.1.6 Scrub – WS<sub>1</sub>

Scrub is emerging along the west and north-west perimeter mainly consisting of Bramble. The INNS Traveller's Joy is found at one location in the scrub habitat.

A small area between the buildings has been left for self-recolonisation and has a diversity of species, including saplings of Sycamore and Ash, the fern Hart's-tongue *Asplenium scolopendrium*, Herb Robert, Willowherb *Epilobium* spp., Cinquefoil *Potentilla* spp., Ivy, Wood Aven *Geum urbanum* and an ornamental Honeysuckle *Lonicera* spp.

This habitat is considered to be of local importance (higher value).

#### 8.8.1.7 Ornamental/non-native shrub – WS<sub>3</sub>

The flowerbeds around the buildings are planted with ornamental shrub and a few Silver Birch.

This habitat is considered to have less than local ecological importance.

#### 8.8.2 Flora

There were no plant species listed under the Flora (Protection) Order 2015 found during the ecological walkover survey.



### 8.8.3 Protected Fauna

#### 8.8.3.1 Terrestrial Mammals

A review of records held by the NBDC returned records of the following terrestrial mammal species protected under the Wildlife Act, 1976 and Wildlife (Amendment) Act, 2000 within 10km grid squares of the proposed site:

- Badger
- Pine Marten
- Hedgehog
- Irish Stoat
- Red Squirrel
- Pygmy Shrew
- Otter
- Irish Hare
- Red Deer

The site visit searched the site for signs of mammals, the results are summarised in Table 8.7.

**Table 8.7: Results from the site visits**

Species	Survey record
Badger <i>Meles meles</i>	There was no sign of Badger foraging, commuting (tracks), latrines or any other form of habitation recorded during the surveys of the site and its surrounds. The survey recorded no Badger sett present on site.
Pine Marten <i>Martes martes</i>	The surveys recorded no Pine Marten related habitation signs such as scats, tracks or any other form of habitation on site or in the surrounding area.
Hedgehog <i>Erinaceus europaeus</i>	No field signs including scat or tracks of Hedgehog were recorded on site or in the surrounding area during the surveys.
Irish Stoat <i>Mustela erminea hibernica</i>	The surveys recorded no Irish Stoat related habitation signs such as scats, tracks or any other form of habitation on site or in the surrounding area.
Red Squirrel <i>Sciurus vulgaris</i>	There was no sign of Red Squirrel foraging remains, commuting (tracks), scat or any other form of habitation recorded during the surveys of the site and its surrounds.
Pygmy Shrew <i>Sorex minutus</i>	There was no sign of Pygmy Shrew habitation recorded during the surveys of the site and its surrounds.
Otter <i>Lutra lutra</i>	There was no sign of Otter habitation recorded during the surveys of the site and its surrounds.
Irish Hare <i>Lepus timidus</i> subsp. <i>hibernicus</i>	There was no sign of Irish Hare habitation recorded during the surveys of the site and its surrounds.
Red Deer <i>Cervus elaphus</i>	There was no sign of Red Deer habitation recorded during the surveys of the site and its surrounds.

The mammals listed are of 'least concern' in Ireland in the latest Ireland Red List (Marnell *et al.*, 2019). Otter and Red Squirrel were listed as 'near threatened' in the previous Ireland Red List (Marnell *et al.*, 2009) but are now considered 'least concern'. The Otter is an Annex II species protected under the European Habitats Directive.

No evidence of any of the above terrestrial mammals were recorded during the site visit. The lack of watercourses within the site makes it unsuitable for Otter habitation and foraging. Pine Marten and Red Squirrel are extremely shy and woodland specialists and therefore due to the urban environment are not expected to occur within the site. Irish Stoat is more commonly found in rural areas and the closest records on NBDC's website is 6km away, close to Dublin Mountains. Irish Stoat is therefore not expected to occur within the site.

A mammal path was found during the site visit. Red Fox *Vulpes vulpes* was observed on site, along with paw prints and a burrow belonging to Red Fox (Figure 8.7). Red foxes are not considered endangered in Ireland or in the rest of Europe. They are only afforded the most basic legal protection under the Wildlife Act (1976 and amendments).

Due to potential suitability of the proposed site for Badger, Hedgehog and Pygmy Shrew, the site has been valued as being of local ecological importance (higher value).

### 8.8.3.2 Amphibians

The surveys recorded no amphibians (Common Frog *Rana temporaria* and Smooth Newt *Lissotriton vulgaris*) within the site. No suitable habitat, such as ponds and still water, is present on site.

The site is considered to be of less than local importance for amphibians.

### 8.8.3.3 Bats

The ecological walkover of the site identified the site as being suitable as foraging and commuting habitat for bats as it provides open grassland and woodlands in an urban setting. It is also located close to the River Dodder which provide an important corridor for commuting and foraging bats.

#### *Potential Roost Feature assessment of buildings and trees*

The trees were assessed from ground level by inspection of the exterior of the trees. The trees on the site are in general of negligible value as roosts for bats, though there are three trees which have low to moderate bat roost suitability. These are three mature Sycamore with features such as thick Ivy cover or hollows in the stem. These trees have the following Arboricultural Tag Number: 297, 311 and 352. The Arboricultural Assessment, Arboricultural Impact and Tree Protection Strategy Report (CMK Horticulture & Arboriculture Ltd, 2021) recommend removal of tree 311 and cutting of Ivy on tree 297 and 352. The trees, including Arboricultural Tag Numbers, are shown in Figure 8.13.

Buildings were assessed from ground level on the outside, the Chapel and Tabor House, and part of the roof of Milltown Park House were also viewed from the second level of Milltown Park House. The Chapel and Milltown Park House were also inspected from the inside. However, while the presence of attic space was confirmed, it could not readily be accessed for health and safety reasons. Therefore, the inspection of the buildings was complemented with emergence surveys between May and July of 2020 (see section 8.4.7 for details) which is the appropriate time for these type of surveys and followed best practice guidance (Collins, 2016).

Two of the buildings (the Chapel and Tabor House) were identified to have moderate bat roost suitability due to the presence of access holes to the roof space. Bats could enter via the vents or via the chapel roof where a roof tile is missing. The roof of Milltown Park House was observed to be intact (Figure 8.12) and offers low potential for bat roosts. Milltown Park House was identified to have low bat roost potential due to no access point for bats visible from the outside, though the building has attic space. The other flat roofed buildings were assessed as having no potential bat roosting features. A survey on 18 May 2021 confirmed no change to or deterioration of roof structures. A summary of potential roosting features and roosting potential of each buildings is in Table 8.8 and the buildings are shown in Figure 8.13.

**Table 8.8: Potential Roosting Features and Suitability in buildings**

Building	Potential Roosting Features present	Overall roosting potential of building
Chapel	Presence of roof space Access from outside via vents and missing roof tile	Moderate
Tabor House	Access from outside via vents and cracks around gutter	Moderate
Milltown Park House	Presence of attic. No visible access point	Low
All other buildings	None	Negligible



**Figure 8.12: View of intact roof at the western end of Milltown Park House.**



**Figure 8.13: Trees and buildings assessed to have bat roost potential during the preliminary assessment.**

(Source: Google Maps/JBA Consulting)

The results from emergence surveys that occurred for each of these buildings are detailed in the next section.

### *Emergence and transect surveys*

Emergence and transect surveys were carried out during the summer months (May- August 2020) which is the appropriate time for these types of surveys. The results from emergence surveys that occurred for each of the buildings are seen in Table 8.9 and the results from the transect surveys are seen in Table 8.10 Table 8.10. Static detector results for each of these areas are seen in Table 8.11, Table 8.12, Table 8.13, Table 8.14 and Table 8.15.

The viewpoints for the emergence survey, transect route for activity survey and location of static bat detectors are shown in Figure 8.14. The emergence surveys were conducted to identify if the buildings and trees with bat roost potential are used as roosts. The emergence viewpoints targeted the potential exit and entrance locations for bats on the buildings and trees. The transect route recorded the activity of bats at the site and the usage, i.e. commuting or foraging, of the treelines, woodland and grassland. The static bat detectors were put up to record the usage of the different habitats of the bat, including the grassland behind the Chapel, the woodland and in front of Tabor House and the Chapel.





**Figure 8.14:** Emergence viewpoints, transect route and location of static detectors.  
 (Source: Google Maps/JBA Consulting)

During the emergence surveys, no bats were recorded emerging from the buildings or trees, though Leisler’s Bat were recorded several times flying above the rooftops coming from the south. The grassland behind the Chapel and Tabor House was frequently used by foraging bats. A summary of the results from the emergence surveys is provided in Table 8.9.

**Table 8.9:** Results from bat emergence surveys carried out during the summer season 2020.

Date	Viewpoint	Species	No. of records	Observation
20th May 2020	West of Chapel	Common Pipistrelle ( <i>Pipistrellus pipistrellus</i> )	2	Flying near Chapel and Tabor House over grassland
		Leisler’s Bat ( <i>Nyctalus leisleri</i> )	1	Flying near Chapel and Tabor House over grassland
		Unidentified bat	1	Flew around Chapel
	Trees	Common Pipistrelle ( <i>Pipistrellus pipistrellus</i> )	1	Above treetops
		Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	1	In woodland
15th June 2020	West of Chapel	Common Pipistrelle	7	Foraging in grassland and trees west of Chapel
		Soprano Pipistrelle	2	Foraging in grassland



Date	Viewpoint	Species	No. of records	Observation
	East of Chapel	Leisler's Bat	2	Above rooftop of buildings Foraging in grassland
		Leisler's Bat	2	Above Chapel
		Unidentified bats	2	Flying over buildings
16th July 2020	West of Chapel	Common Pipistrelle	5	Flying over Tabor House Foraging in grassland
		Leisler's Bat	1	Trees west of Chapel
	South of Milltown Park House	Common Pipistrelle	1	
		Leisler's Bat	3	Flying over buildings

The transect surveys identified the grassland being used by bats for foraging and a few bats were recorded using the treelines and woodland for commuting. A summary of the results from the transect survey is provided in Table 8.10.

**Table 8.10: Results from bat activity (transect) surveys carried out during the summer season 2020.**

Date	Species	No. of records	Observation
20th May 2020	Common Pipistrelle	2	North of car park Foraging in grassland
15th June 2020	Common Pipistrelle	6	Commuting along woodland and Holly treeline Foraging in grassland
	Pipistrelle species ( <i>Pipistrellus</i> spp.)	1	North of carpark
16th July 2020	Common Pipistrelle	1	Southern carpark
	Leisler's Bat	6	Foraging north of carpark Beside Tabor house

### *Static detector recordings*

The static recorder put up north-east of Tabor House (Table 8.11) recorded bats passing in front (east) of Tabor House. A total of 26 passes of bats were recorded during the five nights, with Common Pipistrelle and Leisler's Bat being more frequent than Soprano Pipistrelle.

**Table 8.11: Recordings from north east of Tabor House (May).**

Species	Date					Grand Total
	20/05/2020	21/05/2020	23/05/2020	24/05/2020	25/05/2020	
Common Pipistrelle	3	1	1	4	6	15
Leisler's Bat	3	3		2	1	9
Soprano Pipistrelle	1	1				2
<b>Grand Total</b>	<b>7</b>	<b>5</b>	<b>1</b>	<b>6</b>	<b>7</b>	<b>26</b>

The static recorder put up in June recorded bats passing in front (east) of the Chapel. The recordings in June were restricted to only two nights due to technical issues, however it does

not constrain the overall results and assessment (Table 8.12). A total of 29 passes of bats occurred during these two nights, 24 Common Pipistrelle and 5 Leisler's Bat.

**Table 8.12: Recordings from east of Chapel (June).**

Species	Date		Grand Total
	15/06/2020	16/06/2020	
Common Pipistrelle	19	5	24
Leisler's Bat	1	4	5
<b>Grand Total</b>	<b>20</b>	<b>9</b>	<b>29</b>

Two static recorders were installed during five nights in July, one placed west of the woodland (Table 8.13) and the other placed west of the Chapel (

Table 8.14). The recorder placed west of the woodland had a total of 209 passes during the five nights, 172 of these were recorded during the first two nights (Table 8.13). Leisler's Bat was most frequent with 120 passes.

**Table 8.13: Recordings west of woodland (July).**

Species	Date					Grand Total
	16/07/2020	17/07/2020	18/07/2020	19/07/2020	20/07/2020	
Common Pipistrelle	34	7	2	16	2	61
Leisler's Bat	45	62	1	1	11	120
Pipistrelle spp.	2				1	3
Soprano Pipistrelle	11	11		1	2	25
<b>Grand Total</b>	<b>92</b>	<b>80</b>	<b>3</b>	<b>18</b>	<b>16</b>	<b>209</b>

The recorder placed west of the Chapel recorded a total of 78 passes during the five nights in July (

Table 8.14). The site was most frequently used by Leisler's Bat, followed by Common Pipistrelle. The Soprano Pipistrelle was only recorded four times during this period.

**Table 8.14: Recordings west of Chapel (July)**

Species	Date					Grand Total
	16/07/2020	17/07/2020	18/07/2020	19/07/2020	20/07/2020	
Common Pipistrelle	5	5	4	5	10	29
Leisler's Bat	12	18	5	3	7	45
Soprano Pipistrelle			2	1	1	4
<b>Grand Total</b>	<b>17</b>	<b>23</b>	<b>11</b>	<b>9</b>	<b>18</b>	<b>78</b>

A static recorder was installed west of the Chapel again in August. A total of 34 passes of bats were recorded during these five nights (Table 8.15). Only Common Pipistrelle and Leisler's Bat were recorded this time. More passes of bats were recorded during the first two nights compared to the last three nights.

**Table 8.15: Recordings west of Chapel (August).**

Species	Date					Grand Total
	19/08/2020	20/08/2020	21/08/2020	22/08/2020	23/08/2020	
Common Pipistrelle						
Leisler's Bat						
<b>Grand Total</b>						

Common Pipistrelle	8	5	4	2	1	20
Leisler's Bat	5	8			1	14
<b>Grand Total</b>	<b>13</b>	<b>13</b>	<b>4</b>	<b>2</b>	<b>2</b>	<b>34</b>

### Discussion of results

The static recordings contain the same species as recorded during the emergence and transect surveys, i.e. Common Pipistrelle, Leisler's Bat and Soprano Pipistrelle. The site is most frequently used by the first two species.

From the results of the emergence surveys, it can be concluded that Tabor House and the Chapel are not used as roost by bats. The bats were observed flying over and around the buildings, coming from the south. Milltown Park House was observed from the south during the emergence survey in July (Figure 8.14) and no bats were recorded emerging from the building, which is consistent with the initial assessment of the building as having low bat roost potential. A parapet around part of the roof of Milltown Park House prevented full sight line, but no bats were observed emerging from these sections of the roofs.

Given the low to moderate roost potential of the trees, and the low activity (no emergence) observed during the emergence survey of the trees (Table 8.9), it is unlikely that the trees are used as roosts by bats. However, bats using trees as roosts are known to exhibit a roost switching behaviour (Collins, 2016), i.e. the roost could be used at some point during the season, making it difficult to rule out the usage of trees as roosts. Therefore, using the precautionary principle, the trees are considered to have a low to moderate bat roost potential.

Most passes recorded by the static detector were recorded at the woodland (Table 8.13), which indicate that it is frequently used by bats. The highest recordings collected by the static were between 10pm – 11pm.

The area west of the Chapel was also highly used by bats. The emergence and activity survey confirmed that the grassland behind the Chapel is used for foraging.

The reason for less activity in May (Table 8.11) could be due to early in the season and low temperatures during the nights. The night temperatures were between 4-13 °C during this period. The ideal temperature for bats is >10 °C as insect activity (food resource) significantly decreases at low temperatures (Kelleher and Marnell, 2006).

Overall, the results show that the site is frequently used by three bat species, Leisler's Bat, Common Pipistrelle and Soprano Pipistrelle, both for foraging and commuting. It cannot be ruled out that identified trees have bat roosts. No bats were seen emerging from the roofs of Tabor House, the Chapel or Milltown Park House, with results demonstrating that these spaces are not being used by bats as maternity roosts. However, as Milltown Park House is destined for demolition, using the precautionary principle, it is considered further in the impact assessment, together with the trees identified as having bat roost potential. The site has been valued as being of regional ecological importance for bats.

#### 8.8.3.4 Birds

Several birds were recorded on the site visits. Birds recorded include Robin *Erithacus rubecula*, Magpie *Pica pica*, Wood Pigeon *Columba palumbus*, Feral Pigeon *Columba livia f. domestica*, Wren *Troglodytes troglodytes*, Blackbird *Turdus merula*, Blue Tit *Parus caeruleus*, Great Tit

*Parus major*, Long-tailed Tit *Aegithalus caudatus*, Chaffinch *Fringilla coelebs*, Goldfinch *Carduelis carduelis*, Greenfinch *Carduelis chloris*, Hooded Crow *Corvus cornix*, Rook *Corvus frugilegus* and Jackdaw *Corvus monedula*.

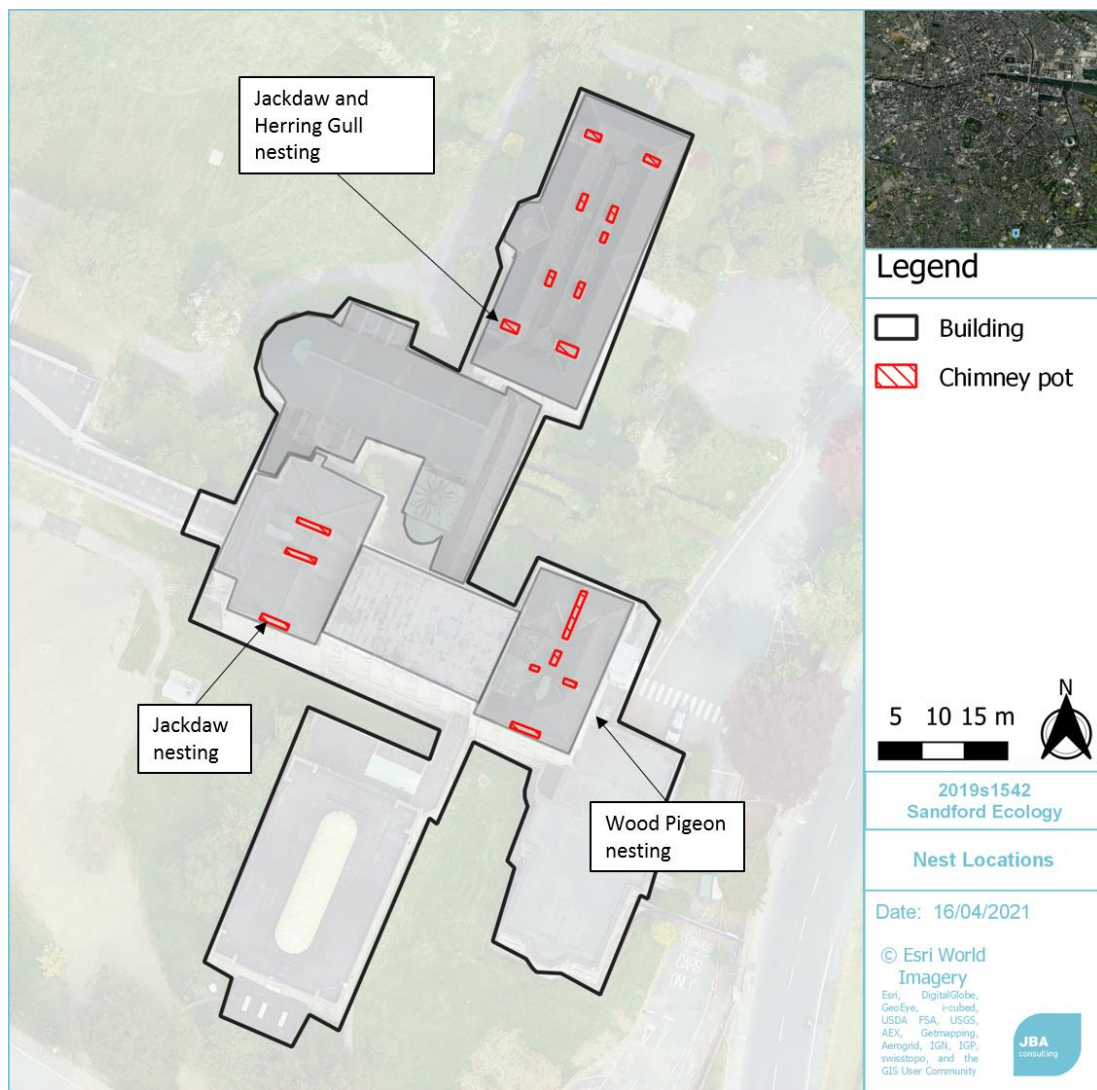
The bird survey conducted on the 15<sup>th</sup> April 2021 recorded the following species: Robin, Magpie, Wood Pigeon, Wren, Blackbird, Blue Tit, Great Tit, Chaffinch, Goldfinch, Hooded Crow, Jackdaw, Herring Gull, Blackcap *Sylvia atricapilla*, Coal Tit *Periparus ater*, Dunnock *Prunella modularis*, Goldcrest *Regulus regulus*, Mistle Thrush *Turdus viscivorus* and Siskin *Carduelis spinus*.

### **Breeding Birds**

The birds recorded on site and listed above use trees and hedges in woodlands, parklands and gardens as nesting habitat. Though no active nests were observed during the surveys it is assumed that many of the birds are nesting on site. A bird's nest was recorded in one of the trees in the woodland to the east. However, this nest was not occupied at the time of survey but would most likely be used by Wood Pigeon as they were frequently observed in the woodland.

The bird survey undertaken on the 15<sup>th</sup> April 2021 recorded Jackdaw nesting in the chimneys of Tabor House and Milltown Park House. Some of the nests were in the process of being made, with birds seen bringing nesting material to the chimneys. Some birds appeared settled in the chimneys. Eggs are laid from mid-April on and young would tend to fledge 7-8 weeks later (mid-end June). Jackdaws may lay a second clutch.

The survey undertaken of the 18<sup>th</sup> May 2021 recorded Jackdaw still nesting and a pair of Herring Gull were recorded nesting on the south-west chimney of Tabor House (Figure 8.15). Material was brought to the chimney by a single gull on several occasions and the partner was sitting on the nest. A pair of Wood Pigeon may be using a drainage vent as nesting site on Milltown Park House. No evidence of breeding Swallow, House Martin or Swift was recorded on or in any of the buildings. The full results of the bird surveys are provided in Appendix 8.3.



**Figure 8.15: Bird nests locations on the buildings.**

**(Source: Google Maps/JBA Consulting)**

Greenfinch, Goldcrest and Herring Gull are Birds of Conservation Concern in Ireland (BoCCI) amber-listed. All other species are green-listed (Gilbert *et al.* 2021). BoCCI lists birds which are decreasing in Ireland and worldwide. Amber-listed species have an unfavourable status in Europe and have moderately declined in abundance, while red-listed species are globally threatened and have rapidly declined in abundance.

Several amber listed birds have been recorded on NBDC within the 10km grid squares, some of which use the same type of habitat found on site and could therefore be found within the site.

Though BoCCI listed species are not given a specific protection they are, along with the majority of bird species, protected under the Wildlife Acts (1976 – 2012) where it is an offence to hunt, interfere with or destroy their breeding or resting places unless authority is obtained via statutory licence provision. As a precautionary approach, due to the suitability of the proposed site for breeding birds, the site has been valued as being of local ecological importance (higher value) for birds.



### Wintering Birds

Mild and wet winters make the wetlands of Ireland an important resource for over three-quarters of a million waterbirds each year. Over 50 species of waterbird migrate to Ireland either on passage to or from more southerly resorts or to spend the entire winter here. They seek out the relatively undisturbed wetland areas for feeding and for safe roosting opportunities. Significant populations of the following waterbirds overwinter in Ireland: Light-bellied Brent Goose, Black-tailed Godwit, Whooper Swan, Greenland White-fronted Goose and Ringed Plover (Birdwatch Ireland, 2020).

Brent Goose are known to frequent large parks in Dublin to graze on short turf grass during the latter half of the winter months. However, the grassland at the proposed development site was considered unsuitable foraging habitat due to grass being uncut with a height >15cm and the restricted sight-lines at the site. The uncut grass was present even before the Applicant purchased the site and the current state is a result of maintaining this position (Figure 8.16). Brent Goose prefer large open sites where they have clear sight-lines and short, lush grass for grazing (King, 2010). The bird surveys conducted in March 2020 and between November 2020 and February 2021 recorded no wintering birds within the site. One Curlew *Numenius arquata* was recorded high in flight on one occasion, though it did not land within the site. The site is not within any known flight line of sensitive wintering bird species. The full results from the surveys are provided in Appendix 8.3.

Based on the results from the bird surveys, which did not record any wintering birds within the site, and the habitats present on site not being suitable for foraging, the site is considered to be of less than local importance for wintering birds. Wintering birds are therefore not considered further in the assessment.



**Figure 8.16:** Photograph from the sales brochure of the Sandford Road site showing the grassland with tall grass, taken in 2019.

(Source: Sandford Road Sales Brochure, GVA Donal O Buachalla)

#### 8.8.4 Invasive Non-native Species (On-site)

During the surveys on site, non-native species were recorded by JBA staff. An invasive non-native species survey was conducted by Invasive Plan Solutions in December 2020 and in April 2021. The following non-native species were recorded within the site:

- Winter Heliotrope *Petasites pyrenaicus*
- Snowberry *Symphoricarpos albus*
- Butterfly-bush *Buddleja davidii*
- Traveller's-joy *Clematis vitalba*
- Three-cornered Garlic *Allium triquetrum*
- Spanish Bluebell *Hyacinthoides hispanica*

The following invasive mammal was recorded:

- Grey Squirrel *Sciurus carolinensis*

Three-cornered Garlic and Spanish Bluebell are listed on the Third Schedule of the EC (Birds and Natural Habitats) Regulations 2011 S.I. No. 477/2011. These were recorded at a number of locations within the site.

Winter Heliotrope occurs extensively on the woodland understorey (Figure 8.17) and there are some stands of Snowberry as well. Butterfly-bush is one of the ornamental shrubs in front of the buildings. At the south-western boundary is a small area of Traveller's-joy within the scrub habitat.

Grey Squirrel was spotted in the south part of the site and is likely to use the site for habitation and foraging. The species is listed on the Third schedule of the EC (Birds and Natural Habitats) Regulations 2011 S.I. No. 477/2011.

Butterfly-bush and Traveller's-joy are rated as Medium Impact species. Grey Squirrel is rated as High Impact species and pose a serious threat to the endangered Red Squirrel by competing on habitat and food resources and by being a vector for the Parapox virus which can be fatal to Red Squirrels.



Figure 8.17: The non-native species Winter Heliotrope.

### 8.8.5 Screening of Ecological Features

The screening of ecological features is given in Table 8.16. Those features screened out are not considered further in this assessment. Ecological features carried forward are assessed for potential impact during construction and operation in the following sections.

Table 8.16: Summary of ecological features and the screening assessment.

Ecological feature	Value	Screening
Dodder Valley pNHA	National	carried forward
Boosterstown Marsh pNHA	National	carried forward
The Dolphins, Dublin Docks pNHA	National	carried forward
Dalkey Coastal Zone and Killiney Hill pNHA	National	carried forward
Aquatic receptors (fish)	Regional	carried forward
Buildings and artificial surfaces	Less than local	out
Amenity grassland (improved)	Local (higher value)	carried forward
Mixed broadleaved/conifer woodland	Regional	carried forward
Scattered trees and parkland	Less than local	out
Treelines	Regional	carried forward
Scrub	Local (higher value)	carried forward
Ornamental/non-native shrub	Less than local	out
Terrestrial mammals	Local (higher value)	carried forward
Amphibians	Less than local	out
Bats	Regional	carried forward
Breeding birds	Local (higher value)	carried forward
Wintering birds	Less than local	out

## 8.9 Potential Impact of the Proposed Development

### 8.9.1 Introduction

The impacts on the valued ecological features are assessed here. The initial assessment considers the potential impact pathways and whether these apply to the ecological features. The impact assessment considers the project and the anticipated effects in the absence of any mitigation.

The key construction and operational impacts assessed are:

- Disturbance to habitats and species
- Habitat loss
- Impacts on water quality
- Groundwater abstraction

### 8.9.2 Do Nothing Scenario

The site inhabits a former Jesuit College which is no longer in use. The buildings on site are currently occupied by caretakers. If the proposed works were not to go ahead, it is likely that the park area with grassland, treelines and woodland would be retained and possibly left in a less intensely managed regime, e.g. the current situation indicate that the grass is not cut on a regular basis. The naturalisation of the grassland has the potential to increase floral species diversity. There will be no loss of habitat. The invasive non-native species in the woodland have the potential to outcompete the native flora in the groundcover of the woodland if appropriate management is not carried out.

### 8.9.3 Construction Phase

The following sections describe the nature of temporary impacts predicted for designated protected sites, habitats, and species in the absence of implemented mitigation measures during the development's construction phase.

#### 8.9.3.1 Dodder Valley pNHA

The proposed development could impact on Dodder Valley pNHA by reducing the sites connectivity with the wider landscape if habitats on the development site are removed/degraded.

#### *Characterisation of Unmitigated Impact on the Feature*

Urban development in the area continues to reduce Dodder Valley pNHA's connectivity with upstream habitats and the proposed development which is in close proximity to River Dodder could further reduce the connectivity. The proposed works could have a minor to moderate impact on the site in the absence of mitigation.

#### *Rationale for prediction of effect*

The footprint of the development will necessitate the removal of habitats, including treelines, scrub and part removal of woodland. The reduction of connecting habitats in the landscape has the potential to isolate the Dodder Valley pNHA. The close proximity to River Dodder makes the proposed development site an important connecting habitat to the pNHA site.

### *Effect without mitigation*

The unmitigated effect of this development will result in minor to moderate impacts in the medium to long-term to this site of national importance.

#### **8.9.3.2 Booterstown Marsh pNH, The Dolphins, Dublin Docks pNHA and Dalkey Coastal Zone and Killiney Hill pNHA**

The pNHAs has surface water connectivity with the proposed development. Surface water reaches Dublin Bay via River Dodder. However, the proposed development will have no impact on these sites. The reasoning is given below.

### *Characterisation of Unmitigated Impact on the Feature*

Stormwater during the Construction phase will be discharged to the existing surface water system which discharges to the River Dodder. The water could impact on water quality by increased sedimentation and runoff of pollutants, such as hydrocarbons. Suspended solids will settle naturally within the drainage pipes and hydrocarbons will dilute to background levels when it reaches open water. The magnitude of the impact on Booterstown Marsh pNH, The Dolphins, Dublin Docks pNHA and Dalkey Coastal Zone and Killiney Hill pNHA will be negligible.

### *Rationale for prediction of effect*

A Hydrological and Hydrogeological Qualitative Risk Assessment was carried out by AWN Consulting (provided in Appendix 8.1) to assess the potential for any likely significant impacts on receiving waters within protected areas, during both the construction and operational phase of the Proposed Development. It is noted that this assessment was carried out in the absence of any consideration of any measures intended to avoid or reduce harmful effects potentially caused as a result of the Proposed Development (i.e. mitigation measures). According to this assessment, "there are no pollutant linkages as a result of the construction or operation of the Proposed Development which would have an appreciable effect on water quality impact at the Natura sites within Dublin Bay".

The risk assessment states:

*Should any silt-laden stormwater from construction or hydrocarbon-contaminated water from a construction vehicle leak manage to enter the public stormwater sewer, the suspended solids will naturally settle within the drainage pipes and hydrocarbons will dilute to background levels (water quality objectives as outlined in S.I. No. 272 of 2009 and S.I. No. 77 of 2019 amendment); by the time the stormwater reaches any open water based on the distance to waterways. Similarly, during operation, should any leak of hydrocarbon occur from a vehicle, the volume of contaminant release is low and combined with the significant attenuation within in the public stormwater sewers, hydrocarbons will dilute to background levels with no likely impact above water quality objectives as outlined in S.I. No. 272 of 2009 and S.I. No. 77 of 2019. It can also be concluded that the in-combination effects of surface water arising from the proposed development taken together with that of other similar developments will not be significant given the potential loading of contaminant and the expected attenuation above mentioned.*

### *Effect without mitigation*

The unmitigated effect of this development will result in neutral impacts in the short-term to these sites of national importance.



### 8.9.3.3 Habitats

#### *Mixed broadleaved/conifer woodland / treelines / scrub / grassland*

Ecological impact to the woodland, treelines, scrub and grassland habitats has the potential to occur via land and air pathways. Some of the trees and scrub will be removed due to the proposed development. In the absence of mitigation dust release from works carried out at the site (demolition, earthworks, construction and movement of heavy vehicles) could impact on this habitat by settling on the leaves and thus reducing their ability for photosynthesis. The amenity grassland west of Tabor House was used for foraging by bats. This habitat will be removed which could have an indirect impact on bats using the site in absences of mitigation.

#### *Characterisation of Unmitigated Impact on the Feature*

The works would have a moderate impact on the habitat due to the removal of vegetation and creation of dust settling on vegetation.

#### *Rationale for prediction of effect*

Chapter 12 Air Quality and Climate of this EIAR, completed by AWN Consulting, identifies that there is a medium risk of dust related impacts (dust soiling) and low risk for impacts on human health. AWN Consulting assesses that in the absence of mitigation there is the potential for imperceptible, negative, short-term impacts to human health as a result of the proposed development. While the receptors in this case are people and properties, it can also be considered that dust release can impact on vegetation within the site.

A total of 404 trees were identified and assessed on site by CMK Horticulture & Arboriculture. 283 of these trees will be removed (Figure 8.18), with the majority of removed trees being on the western boundary and within the central section of the site where the main footprint of the development is located. Of the four treelines present on site, the Holly treeline in the centre of the site and the western double treeline will be removed. One mature tree will be retained of the eastern treeline along the entrance road and the treeline at the south of the site will be fully retained (refer to Figure 8.7 for location of treelines). Low quality trees in the woodland along the north and east boundary will be removed due to the development and to provide for amenity area around the woodland. An area of 550m<sup>2</sup> woodland habitat will be removed in the north east corner to allow for a play area. The scrub along the western boundary and the amenity grassland will be removed. Dust release will occur during the construction and will be temporary, however works could have physical impact on the vegetation. Mitigation and compensation measures will be incorporated in lieu of the removal of vegetation.



Figure 8.18: Trees to be removed on site (marked in red)

(Source: Cameo & Partners Design Studio)

*Effect without mitigation*

The unmitigated effect of this development will result in moderate, medium to long-term impacts to habitats of regional and local importance.

### 8.9.3.4 Species

#### *Aquatic Receptors (fish)*

Potential impacts on aquatic receptors could be created via surface water by runoff of pollutants and sediment during construction, impacting on water quality of River Dodder and the fitness of fish species present or impacts via groundwater where abstraction of groundwater may be needed during construction of the basement.

#### *Characterisation of Unmitigated Impact on the Feature*

Potential release of pollutants and sediment during the Construction Phase may have a negative impact on the aquatic receptors. Decreased water quality or direct contact with pollutants is considered to have a negative impact on the fish populations. Potential reduction of available prey species, such as aquatic invertebrates, may also result in a decrease of this group of species. However, any impact is not anticipated to be significant as suspended solids will settle naturally within the drainage pipes and hydrocarbons will dilute to background levels when it reaches open water.

#### *Rationale for prediction of effect*

A Hydrological and Hydrogeological Qualitative Risk Assessment was carried out by AWN Consulting to assess the potential for any likely significant impacts on receiving waters within protected areas, during both the construction and operational phase of the Proposed Development. It is noted that this assessment was carried out in the absence of any consideration of any measures intended to avoid or reduce harmful effects potentially caused as a result of the Proposed Development (i.e. mitigation measures). According to this assessment, "there are no pollutant linkages as a result of the construction or operation of the Proposed Development which would have an appreciable effect on water quality impact at the Natura sites within Dublin Bay".

The risk assessment states:

*Should any silt-laden stormwater from construction or hydrocarbon-contaminated water from a construction vehicle leak manage to enter the public stormwater sewer, the suspended solids will naturally settle within the drainage pipes and hydrocarbons will dilute to background levels (water quality objectives as outlined in S.I. No. 272 of 2009 and S.I. No. 77 of 2019 amendment); by the time the stormwater reaches any open water based on the distance to waterways. Similarly, during operation, should any leak of hydrocarbon occur from a vehicle, the volume of contaminant release is low and combined with the significant attenuation within in the public stormwater sewers, hydrocarbons will dilute to background levels with no likely impact above water quality objectives as outlined in S.I. No. 272 of 2009 and S.I. No. 77 of 2019. It can also be concluded that the in-combination effects of surface water arising from the proposed development taken together with that of other similar developments will not be significant given the potential loading of contaminant and the expected attenuation above mentioned.*

Even though groundwater abstraction may be necessary during the construction of the basement, no significant dewatering is expected given the low permeability overburden underlying the site and it is not envisaged that the proposed development works will have any direct impact on the underlying hydrogeology (as noted in the DBFL Basement Impact Assessment "The new basement shall not have an adverse effect on existing ground water regime as the basement extends into the low porosity boulder clays"). Therefore, there will not be any impacts on aquatic receptors via groundwater.

### *Effect without mitigation*

The unmitigated effect to this development would result in negligible, temporary impact to aquatic receptors, which are of regional importance.

### *Terrestrial Mammals*

Terrestrial mammals, such as Badger, Hedgehog and Pygmy Shrew are considered to possibly be present on the site (though no signs recorded during the site visit), using the precautionary principle and based on habitat suitability. Potential for ecological impact on these terrestrial mammals, in the absence of mitigation focuses on the following factors:

- Loss of habitat and foraging area;
- Increased noise and human activity within the site during the period of the proposed works;
- Dust deposition and subsequent changes in habitat composition (changes to structural, foraging and commuting habitat).

Although this group of species are generally mobile, constructional impacts attributed to noise, vegetation removal and dust deposition must be considered. Dust can have direct impacts on insect and other invertebrate populations. In the absence of mitigation measures, impacts on plant and invertebrate communities has the potential to result in effects further up the food chain (terrestrial mammals).

### *Characterisation of Unmitigated Impact on the Feature*

It is considered possible that habitat removal or modification could afford a negative impact on local mammal populations, resulting in reduction of commuting and foraging habitat. Removal of vegetation during the winter months could also result in direct mortality of hibernating Hedgehogs as they hibernate in piles of leaves and logs. Noise, vibration and increased human presence associated with the construction phase is likely to result in a disturbance impact to local mammal groups. In the absence of mitigation, the loss of foraging and commuting habitat would be a medium to long term minor impact on these species at the local level.

### *Rationale for prediction of effect*

The variable effects associated with construction noise and potential habitat severance and loss at different distances from the source of disturbance, are very little understood for small to medium mammals. Habitat loss would be likely to afford a level of perceived stress and possible mortality, dependent on species mobility.

Any losses of foraging habitat and potential habitat fragmentation could cause stress to this species group. In the context of this urban landscape, available habitats are scarce and decreasing. Although no field evidence of Badger, Hedgehog and Pygmy Shrew were recorded on site, on a precautionary basis, it is considered likely that this impact could negatively affect the conservation status of these local mammal populations in the absence of mitigation.

### *Effect without mitigation*

The unmitigated effect of this development during construction would result in minor short to medium-term local impacts to Badger, Hedgehog and Pygmy Shrew, which are of high local sensitivity and importance.

### *Bats*

Ecological impacts to bats have the potential to occur as a consequence of disturbance during the construction phase, such as constructional disturbance and lighting disturbance and potentially removal of tree roosts and buildings with roosts. While the preliminary bat roost suitability survey and emergence surveys did not find physical evidence of Bat species roosting on site, features for bat roost potential are present. Milltown Park House and the three trees with identified roost features (Figure 8.13) could not be ruled out and as a precaution it is considered that bats could potentially use these as roosts. The bat activity surveys found that the site is frequently used by bats. The woodland and grassland provide foraging and commuting opportunities for bat species inhabiting the locality.

Predicted impacts therefore constitute the following:

- Increased noise and human activity along commuting routes and within foraging habitats.
- Lighting could illuminate commuting and foraging habitats.
- Removal of potential tree roosts and building.
- Loss of grassland foraging habitat

### *Characterisation of Unmitigated Impact on the Feature*

Lighting during the hours of darkness has the potential to reduce the quality of foraging and commuting habitat for bats. Noise effects associated with the works would be temporary during daytime and no nocturnal noise effects are anticipated as working hours will be between 07:00 – 19:00 Monday to Friday and 09:00 – 13:00 Saturday and no work on Sundays and Public Holidays. Out of hours work might be required in some circumstances. In the absence of mitigation, the reduced habitat quality due to lighting will be minor to negligible to this species, due to the temporary nature of the construction phase.

Removal of potential tree roosts and building (Milltown Park House) could afford a negative impact on local bat populations and reduce their chances of reproduction in absence of mitigation. Bats could also be harmed in the removal of roosts. In the absence of mitigation (section 8.10.2.4), it would be likely to result in a minor medium to long-term impact on regional bat populations. Removal or reduction in grassland could reduce the amount of foraging habitat available for bats, thus could impact on bats foraging in the area.

### *Rationale for prediction of effect*

Some potential bat roosts and commuting routes between foraging areas will most likely be affected. The footprint of the proposed development is considered to be good in terms of foraging value. There are mature trees with low to moderate bat roost potential and Milltown Park House is considered to have low bat roost potential. The effect of removal of potential roosts is likely to be minor, given that roosts are likely to be small and only a few individuals would suffer in worst case scenario. In the context of this urban landscape, foraging and commuting habitats and roosting habitats are scarce, however, the proximity to River Dodder increases the connectivity to the wider landscape. On a precautionary basis, it is considered



likely that this impact could negatively affect the conservation status of the regional bat population.

### *Effect without mitigation*

The unmitigated effect during construction would result in a minor, medium to long-term impact to species of regional sensitivity and importance. All bats are protected under the Irish Wildlife Acts (1976 – 2012) and they are also listed on the EU Habitats Directive.

### *Breeding Birds*

The potential for ecological impact to the breeding bird group, in the absence of mitigation focuses on the following factors:

- Vegetation and habitat removal.
- Removal of nests due to demolition of building
- Construction noise disturbance.
- Dust deposition and subsequent changes in habitat composition (changes to structural, foraging, breeding and commuting habitat).

### *Characterisation of Unmitigated Impact on the Feature*

Noise, vibration and increased human presence associated with the construction phase is likely to result in a disturbance impact to local breeding bird populations during the breeding season and has the potential to result in reduced breeding success of birds. Removal of vegetation (scrub and trees) and demolition of buildings during the breeding season which are used by nesting birds could result in the loss of individuals, including young of the species.

### *Rationale for prediction of effect*

The disturbance caused by noise, vibration and increased human presence is unlikely to cause stress to this group, as is the minor losses of foraging grassland habitat. Effects to nesting birds will be dependent on the timing of vegetation removal and demolition of buildings, however there will be a net loss of nesting habitat. On a precautionary basis, it is considered likely that this impact could negatively affect the birds using the site.

Given that birds are mobile species and the presence of available habitats in the vicinity, long-term impact is not considered on any of the bird species using the site, included Amber and Red Listed species of Conservation Concern.

### *Effect without mitigation*

The unmitigated effect to this feature would result in a minor short to medium-term impact to species of low-medium local importance. The majority of bird species are protected under the Wildlife Acts (1976 – 2012) where it is an offence to hunt, interfere with or destroy their breeding or resting places unless authority is obtained via statutory licence provision.

## 8.9.4 Operational Phase

### 8.9.4.1 Habitats

#### *Mixed broadleaved/conifer woodland / treelines / scrub/grassland*

Ecological impact to these habitats has the potential to occur via air pathways. Emissions from local traffic could impact on air quality and settle on leaves, reducing their ability to photosynthesize. However, emissions to air during operation is not likely to affect the vegetation. The amenity grassland west of Tabor House was used for foraging by bats. The loss of this habitat is likely to have an indirect impact on bats using the site.

Lighting of previously unlit habitats has the potential to make the habitat unsuitable for bats using the site.

#### *Characterisation of Unmitigated Impact on the Feature*

Generation of emissions during the operation of the site is related to traffic movement, as identified in Chapter 12 Air Quality and Climate of this EIAR, completed by AWN Consulting. Based on traffic flow information, AWN Consulting screened out pollutant emissions. Impacts on the habitats will be negligible.

The loss of grassland habitat could reduce the amount of foraging habitat available for bats, thus could impact on bats foraging in the area.

Lighting of habitats within the site could reduce the habitats suitability as commuting and foraging habitat for bats and thus impact on bats using the site.

#### *Rationale for prediction of effect*

AWN Consulting screened out pollutant emissions from traffic. They assess that the traffic levels will not increase more than the scoping criteria (see Section 12.2.2), therefore, an assessment of the impact of traffic emissions during the operational phase on ambient air quality is not necessary as no significant impacts are likely.

Foraging habitat for bats is scarce in the context of the urban landscape. On a precautionary basis, it is considered that the loss of grassland as foraging habitat for bats and reduced quality of habitats due to lighting could negatively affect the conservation status of the regional bat population. Therefore, mitigation measures are required in relation to the loss of grassland habitat.

#### *Effect without mitigation*

The unmitigated effect of this development during operation would result in reduced habitat quality for bat and potential loss of foraging habitat. This has the potential to result in a minor, medium to long-term impact on bats.

### 8.9.4.2 Species

#### *Terrestrial Mammals*

Terrestrial mammals, such as Badger, Hedgehog and Pygmy Shrew are considered to possibly be present on the site (though no evidence recorded during site visit), using the precautionary

principle and based on the habitats suitability. Potential for ecological impact on these terrestrial mammals, in the absence of mitigation focuses on the following factors:

- Operational noise disturbance and human activity.
- Loss of foraging and commuting habitat (woodland, scrub, treelines).

#### *Characterisation of Unmitigated Impact on the Feature*

Noise effects and human activity associated with the operation of the development would be temporary and intermittent during daytime and no nocturnal noise effects are anticipated. In the absence of mitigation, disturbance would have a negligible impact on these species.

It is considered possible that habitat removal or modification could afford a negative impact on local mammal populations, resulting in reduction of commuting and foraging habitat. In the absence of mitigation, the loss of habitat would be a medium to long-term minor impact on these species at the local level.

#### *Rationale for prediction of effect*

Mammals habiting the area would be used to human presence and noise disturbance given the urban landscape and most human activity would be during daytime. Therefore, mitigation measures are not required.

Any loss of foraging habitat and potential habitat fragmentation could cause stress to this species group. In the context of this urban landscape, available habitats are scarce and decreasing. On a precautionary basis, it is considered likely that this impact could negatively affect the conservation status of the local mammal population.

#### *Effect without mitigation*

The unmitigated effect of this development is likely to result in minor short to medium-term impacts to Badger, Hedgehog and Pygmy Shrew, which are of high local sensitivity and importance.

#### *Bats*

Potential ecological impacts to bats that may occur are likely to be through operational disturbance, lighting disturbance and loss of habitat. Bats that are present at this location are likely to be accustomed to a certain level of noise and lighting disturbance given the urban location of the site. Bats are present throughout Ireland and use a variety of habitats for foraging and commuting.

Predicted impacts therefore constitute the following in absence of mitigation:

- Increased noise and human activity along commuting routes and within foraging habitats.
- Lighting could illuminate commuting and foraging habitats.
- Loss of potential roosts and foraging habitat.

#### *Characterisation of Unmitigated Impact on the Feature*

Lighting during the hours of darkness would reduce the quality of foraging and roosting habitat for bats. Noise disturbance associated with the operation of the development would

be temporary and intermittent during daytime and no significant nocturnal noise effects are anticipated.

The loss of potential tree roosts and building, and foraging habitat could afford a negative impact on local bat populations and reduce their chances of reproduction. In the absence of mitigation, it would result in a minor medium to long-term impact on local bat populations.

### *Rationale for prediction of effect*

Operational lighting could illuminate previously unlit commuting and foraging habitat making it unsuitable for bats. Therefore, mitigation measures are required.

Bats habitating the area would be used to human presence and noise disturbance given the urban landscape and most human activity would be during daytime. Therefore, mitigation measures for disturbance are not required.

In the context of urban landscape, roosting habitats are scarce, however, the proximity to River Dodder increases the connectivity to the wider landscape. Loss of roosts within the site could be through direct loss (removal of trees or building) or through indirect loss if the roosts are disconnected by lighting. Given that any roosts are likely to be small, the effect is considered to be minor and only a few individuals would suffer in worst case scenario. However, on a precautionary basis, it is considered likely that this impact could negatively affect the conservation status of the local bat population. Therefore, mitigation measures are required as set out below.

### *Effect without mitigation*

The unmitigated effect to this development would result in minor long-term impacts to species of regional sensitivity and importance. All bat species are protected under the Irish Wildlife Acts (1976 – 2012) and they are also listed on the EU Habitats Directive.

### *Breeding Birds*

The potential for ecological impact to the breeding bird group, in the absence of mitigation focuses on the following factors:

- Operational noise and human disturbance
- Collision with buildings

### *Characterisation of Unmitigated Impact on the Feature*

Noise effects and human activity associated with the operation of the development would be temporary and intermittent during diurnal parts of the day and no significant nocturnal noise effects are anticipated. In the absence of mitigation, disturbance would have a negligible impact on local breeding bird species.

Clear glass/windows make a collision hazard for birds as they don't perceive images reflected in glass as reflections and will fly into windows that appear to be trees or sky. Clear glass also poses a danger as birds have no natural ability to perceive clear glass as a solid object. Features that impact on the likelihood of birds colliding with buildings include:

- total window surface area relative to entire façade

- presence of collision hazards, such as free-standing glass architectural elements, building corners where glass walls/windows are perpendicular
- awnings and overhangs which can provide visual cues and reduce the amount of visual glass
- presence of exterior screens, grilles, shutters and sunshades visual markers on glass

However, the design of the proposed buildings is not anticipated to significantly affect the birds in the area. In the absence of mitigation, the potential for bird collisions would have a negligible impact on the local bird species. The rationale is given below.

### *Rationale for prediction of effect*

Birds habitating the area would be used to human presence and noise disturbance given the urban landscape and the disturbance is unlikely to cause stress to this group. Therefore, mitigation measures are not required.

Migratory birds have the highest risk of colliding with structures. The migration is concentrated along the coasts of Ireland, where song-birds arrive on the east and south coast and then spread through the country (AIP Ireland, 2020). Passage migrants continue northwards using the east coast as a leading line. There is still a risk that birds in the area of the proposed development will collide with glass structures/windows if they are not appropriately designed. However, the design of the buildings are in general agreement with guidelines for bird-friendly best practices (City of Toronto, 2016). The design includes:

- Solid to Glass ratio is between 16-35% with an average of 30% , which is within the recommended ratio 25-40% (City of Toronto, 2016)
- The material palette of the buildings is well broken up with a varied material composition including brickwork, pigmented pre-cast concrete and PPC aluminium to complement brickwork. This will break up the reflective areas of the proposed structures and provide important visible cues to flying birds that the buildings are there.
- The gantry access deck of block C is designed with recessed own doors and bedroom windows which add both visual cues for birds to avoid, as well as reduce the amount of visible glass and the corresponding collision threat.
- The glass balustrade balconies of the taller element of Block A1 are inset balconies with a brick element at the corners which is in line with the broken-up material palette. This will break up the reflective areas of the proposed structures and provide visible cues for flying birds that the buildings are there.

The glass balustrades of the roof terraces could make a collision hazard for potential birds landing on the green roofs. It is anticipated that there will be a limited number of birds using these, with the majority of the birds inhabiting the woodland and it is not anticipated that they will be significantly impacted. However, it is recommended to use patterned glass, such as fritted or similar to be approved, on the roof top glass balustrades to provide visual cues for birds reduce the likelihood of collisions.



### *Effect without mitigation*

The effect to this development would result in a negligible long-term impact to species of local sensitivity and importance.

#### **8.9.5 Invasive Non-native Species**

The construction of the proposed development will involve movement of machinery and soil over a period of 33.25 months. The invasive non-native species Three-cornered Garlic and Spanish Bluebell occur within the site and there is potential for further spread of these species by machineries used within the site. A management plan and a treatment programme of these species is in place for the coming months (spring/summer 2021) (Invasive Plant Solutions, 2021).

While Winter Heliotrope is not an invasive species listed on the Third Schedule of the EU Directive, it could be spread within the site when topsoil is stripped and moved around within the site. This could result in the species competing with local flora within the site.

#### **8.10 Mitigation**

##### **8.10.1 Do Nothing Scenario**

If the proposed works were not to go ahead, it is likely that the park area with grassland, treelines and woodland would be retained and possibly left in a less intensely managed regime, e.g. the current situation indicate that the grass is not cut on a regular basis. The naturalisation of the grassland has the potential to increase floral species diversity. There will be no loss of habitat.

The invasive non-native species in the woodland has the potential to outcompete the native flora in the groundcover of the woodland if the appropriate management is not incorporated.

##### **8.10.2 Construction Phase**

###### **8.10.2.1 Dodder Valley pNHA**

The woodland on the proposed development site will be planted with native shrubs as groundcover and native tree species will be incorporated into the planting regime. This will secure the sites function as a connecting wildlife corridor with River Dodder and the Dodder Valley pNHA. Details on measure in place to strengthen the biodiversity on the site are provided in section 8.10.2.2.

###### **8.10.2.2 Habitats**

### *Mixed broadleaved/conifer woodland / treelines / scrub / grassland*

During removal of vegetation and construction works, trees to be retained will be protected by the erection of protective fencing under supervision of Site Arborist prior to construction and no works are to be undertaken within the tree root protection zone, as specified in the Arborist Report (CMK Horticulture & Arboriculture Ltd, 2021). The Site Arborist shall monitor the tree protection during construction. Further, the regeneration of young trees needs to be safe guarded and young/early mature trees of high quality will be retained.

Planting of new vegetation will take place during construction in tandem with the construction of buildings. To compensate for the removal of 283 No. trees there will be 238 No. new large multi-stem trees and large shrubs planted across the site. Native species of scrub will be planted in the mixed broadleaved/conifer woodland and have been specifically selected to provide nesting habitat for birds and safe cover for mammals. This will enhance the field layer in the woodland as it is currently dominated by non-native species. Species to be planted include: Hawthorn *Crataegus monogyna*, Dogwood *Cornus sanguinea*, Elder, Holly and Guelder Rose *Viburnum opulus*.

The proposed tree planting includes native and non-native (ornamental) species. The native species have been chosen primarily based on species currently present on the site. Native tree species to be planted include: Holly, Wild Cherry, Downy Birch *Betula pubescens*, Pedunculate Oak *Quercus robur*, Rowan *Sorbus aucuparia* and Hazel.

There are six elm trees present on site (five English Elm *Ulmus Procera* and one Wych Elm *Ulmus glabra*). One English Elm (Arborist Tag No. 220) and the Wych Elm (Arborist Tag No. 214) will be retained on the site. Elms have a limited long-term potential due to Dutch Elm disease. Therefore, the Elms to be removed will be replaced with tree species with better long-term prospects, as specified above.

The grassland west of Tabor House, which at present is used for foraging by bats, will be planted with wildflower meadow from native wildflower seed mix and an orchard (*Malus* spp.) which will provide valuable resource for pollinators and thus continue to provide foraging resource for bats. Insect hotels will be installed in this area and in the green space east of the northern entrance of the site which has a mix of heritage lawn and wildflower planting. The insect hotels will be placed in a sunny location facing south, south-east. These will provide nesting habitat for solitary bees.

All the above are incorporated into the Landscape Design Statement (Sandford DAS) accompanying this application and are shown in Figure 8.19. Planting of new vegetation will take place during construction in tandem with the construction of buildings. Planting of native scrub will enhance the woodland habitat and strengthen it as a connecting habitat for wildlife in the wider area. The incorporation of native tree species in the planting scheme will further provide for green connecting corridors within the site.

Green roofs are proposed on the new buildings (refer to Landscape Masterplan) which will compensate for the loss of grassland habitat and enhance biodiversity of the developed site and further connecting the green corridors within the site. Native species (e.g. those associated with native dry grasslands) will be planted on the roofs. Suitably planted green roofs can also provide important foraging habitats for birds and bats.

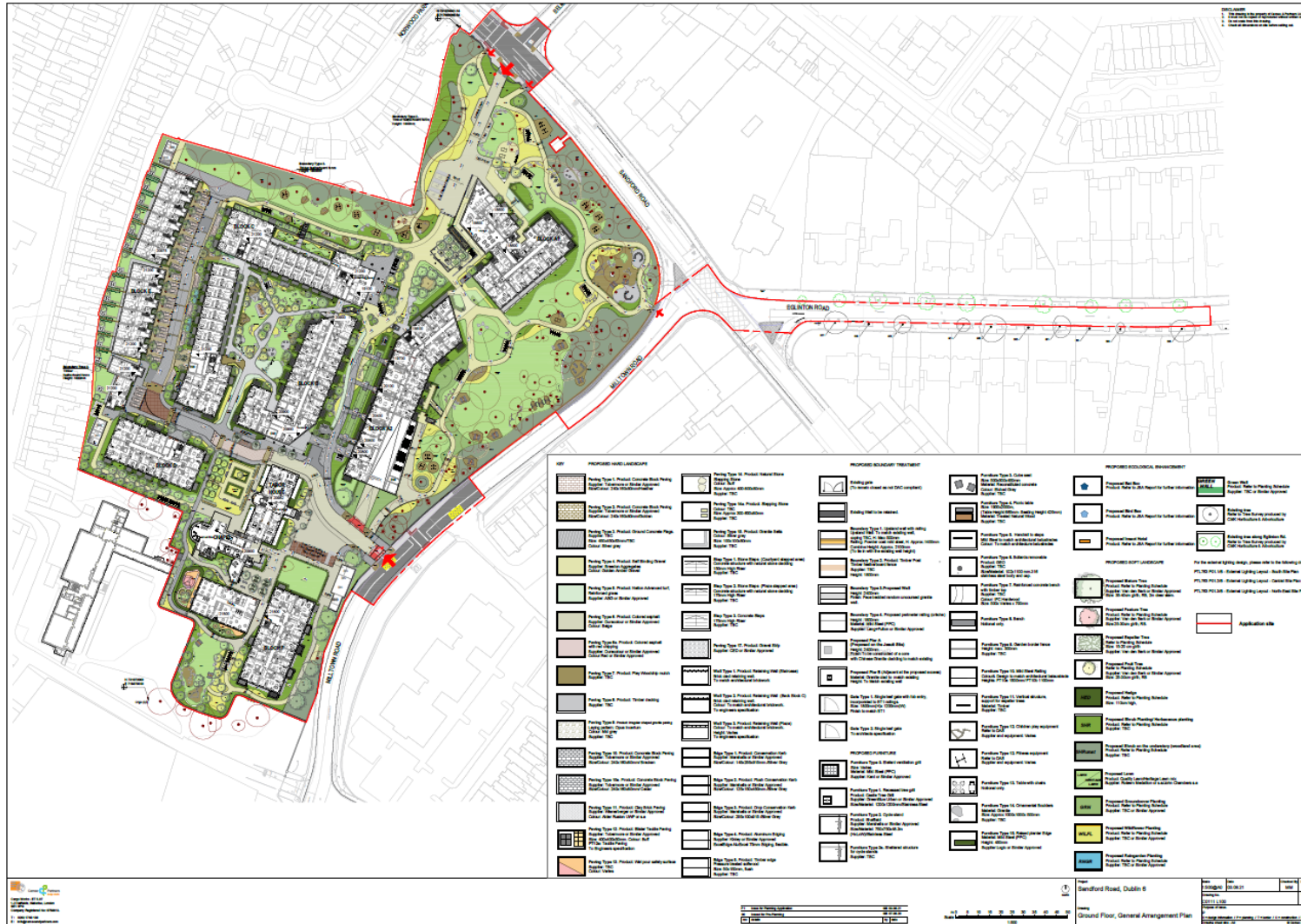


Figure 8.19: Landscape Design Drawing

(Source: Cameo & Partners Design Studio)

### 8.10.2.3 Terrestrial Mammals

General avoidance measures that will be incorporated to minimise disturbance to mammals during construction:

- The hours of working will be limited to daylight; hours where possible, to limit disturbance to nocturnal and crepuscular animals.
- Contractors must ensure that no harm comes to wildlife by maintaining the site efficiently and clearing away materials which are not in use, such as wire or bags in which animals can become entangled;
- Any pipes should be capped when not in use (especially at night) to prevent animals becoming trapped. Any excavations should be covered overnight to prevent animals from falling and getting trapped. If that is not possible, a strategically placed plank should be placed to allow animals to escape; and
- During vegetation removal, caution is needed in case of nesting Hedgehogs within the woodland. The site will be visually checked by an Ecological Clerk of Works (ECoW) prior to bringing in any machinery and be cleared on a rotational basis with scrubby patches left to provide nesting habitat and cover for Hedgehog. In addition, piles of dead wood and brush piles shall be created in undisturbed areas of the site during construction.

The woodland in the north and east part of the site will be retained and enhanced by planting of groundcover with native scrub (see section 8.10.2.1 for details) thus securing habitat for mammals habiting the site. There will be removal of low quality trees and scrub. However, high quality trees (mature and young) and Ivy will be retained. Planting of native species of trees and scrub will strengthen the woodland as a connecting habitat and will compensate for loss of foraging and commuting habitat.

### 8.10.2.4 Bats

#### *Lighting*

Lighting will be switched off during non-working hours where possible and directional lighting will be used during the construction phase. This will minimise spill to any other area forming part of the bats commute. The specification and colour temperature of light treatments is chosen based on their tolerability by bats. LED luminaires are ideal due to their sharp cut-off, lower intensity, and dimming capability. A warm white spectrum (2700 K – 3000 K) will be used to reduce the blue light component.

#### *Vegetation removal*

Three trees on site were identified to have bat roost potential. One of these trees (Arboricultural Tag Number 311) is destined for removal. The following tree felling procedure will be adhered to when felling trees identified as suitable to provide potential bat roosts:

All bats, and any trees that are identified as bat roosts, are legally protected by the Wildlife Acts and the EU Habitats Directive.

The tree with Arboricultural Tag Number 311, which is destined for removal, will be re-examined by an experienced bat specialist before tree felling starts. The examination will be carried out at height under derogation licence using torch and/or endoscope. If features are confirmed as not being suitable for use as roosts, then work can continue. If bats/evidence of bats/or suspected roosts are found, then these will be legally protected, and an application for a derogation licence will be made before moving forward with the works with appropriate mitigation in place, involving soft felling, lowering sections to the ground and then leaving in place overnight (to allow any bats to make their way out).

### *Demolition of buildings*

A pre-construction bat survey of the roof space of Milltown Park House will be conducted prior to any demolition works in case conditions change over the timeframe of the planning application until construction starts. The survey will be conducted by a suitably qualified and licensed bat ecologist. If bats are present, demolition will have to be postponed and a derogation licence will be required before carrying out any works. Prior to works commencing, bats must have safely left the roost which can be done by an exclusion procedure involving installation of one-way valves over access points for bats following instructions from a bat ecologist. The majority of roosts are only used seasonally and demolition works should be adapted to this.

### *Enhancement measures*

Three bat boxes will be installed on mature trees present within the woodland. The following trees have been identified as suitable, referring to Arboricultural Tag Number: 297, 352 and 324 (Figure 8.20). These trees are selected due to being mature and in suitable location for bat boxes. Before the bat boxes are installed, Ivy will be removed from the area surrounding the placement of each Bat box (1m radius). Large multi chambered bat boxes will be used (e.g. <https://www.nhbs.com/large-multi-chamber-woodstone-bat-box> or similar) as they are likely to benefit species identified on site, including Common Pipistrelle *Pipistrellus pipistrellus*, Soprano Pipistrelle *Pipistrellus pygmaeus*, Leisler's Bat *Nyctalus leisleri* and potentially some Myotis Bat species.





Figure 8.20: Location of bat boxes and bird boxes to be installed on retained tree within the site.

(Source: Landscape Design Drawing by Cameo & Partners)

8.10.2.5 Birds

*Seasonality*

Any clearance of trees and scrub will be conducted outside of the bird nesting season (March to September inclusive).

Demolition or reroofing of buildings must take place outside of the bird nesting season (March to September included) as Jackdaw and Herring Gull are nesting in the chimneys. If works are to take place in 2022, or years thereafter, it should take place outside of the bird nesting season or the chimneys should be bird proofed by a specialist contractor prior to nest

building/egg laying and a new breeding bird survey by a qualified ecologist should take place before any demolition works start.

### *Enhancement measures*

Four bird boxes will be installed in the woodland along the eastern boundary. Trees identified to install the bird boxes on have the Arboricultural Tag Number 11, 175, 191 and 269 (Figure 8.20).

### *Planting*

Planting of native species of trees and scrub will compensate for loss of foraging, commuting and nesting habitat. See section 8.10.2.1 for details. The planting of native shrubs in the ground layer of woodland will provide cover and nesting opportunities for birds and the mixed planting of wildflowers, heritage lawn, fruit trees and green roofs will attract insects which is a food resource for many bird species.

#### **8.10.2.6 Biosecurity**

Invasive Plant Solutions have carried out an invasive alien plant species survey and prepared a report including a management plan for the construction phase of the development (provided in Appendix 8.4). The management plan includes a management programme for Three-cornered Garlic and Spanish Bluebell, and ongoing monitoring of the site to screen for the future risk of the introduction of INNS onto the lands from outside the property and biosecurity measures. The management plan includes a multi annual herbicide control programme with a targeted application of a glyphosate based herbicide (Roundup Biactive XL in solution, at a dilution rate of 1:40, or similar).

Prior to clearance of vegetation and works commence in the area, Winter Heliotrope should be removed and appropriately disposed to avoid further dispersal of the species. Removal of Winter Heliotrope can be done by either physical control or chemical control. Due to an extensive rhizome network, physical removal is only practical on a limited scale. The Winter Heliotrope is extensive on the present site and as such chemical control is the preferred option.

Chemical control: Application of a glyphosate-based herbicide will be carried out after flowering in February to March, or in mid to late summer before the foliage begins to die back. All Plant Protection Products will be used in accordance with the product label and with Good Plant Protection Practice as prescribed in the European Communities (Authorization, Placing on the Market, Use and Control of Plant Protection Products) Regulations, 2003 (S.I. No. 83 of 2003). It is an offence to use Plant Protection Products in a manner other than that specified on the label (NRA, 2010). Follow-up will be carried out with foliar spray, wiper applicator or spot treatment. Control measures are based on Guidelines on The Management of Noxious Weeds and Non-Native Invasive Plant Species on National Roads (NRA, 2010).

Grey Squirrel is widespread across the Dublin suburban landscape and any management would have to be at a county level and not dealt with locally. Mitigation measures are not proposed for this species.

### 8.10.3 Operational Phase

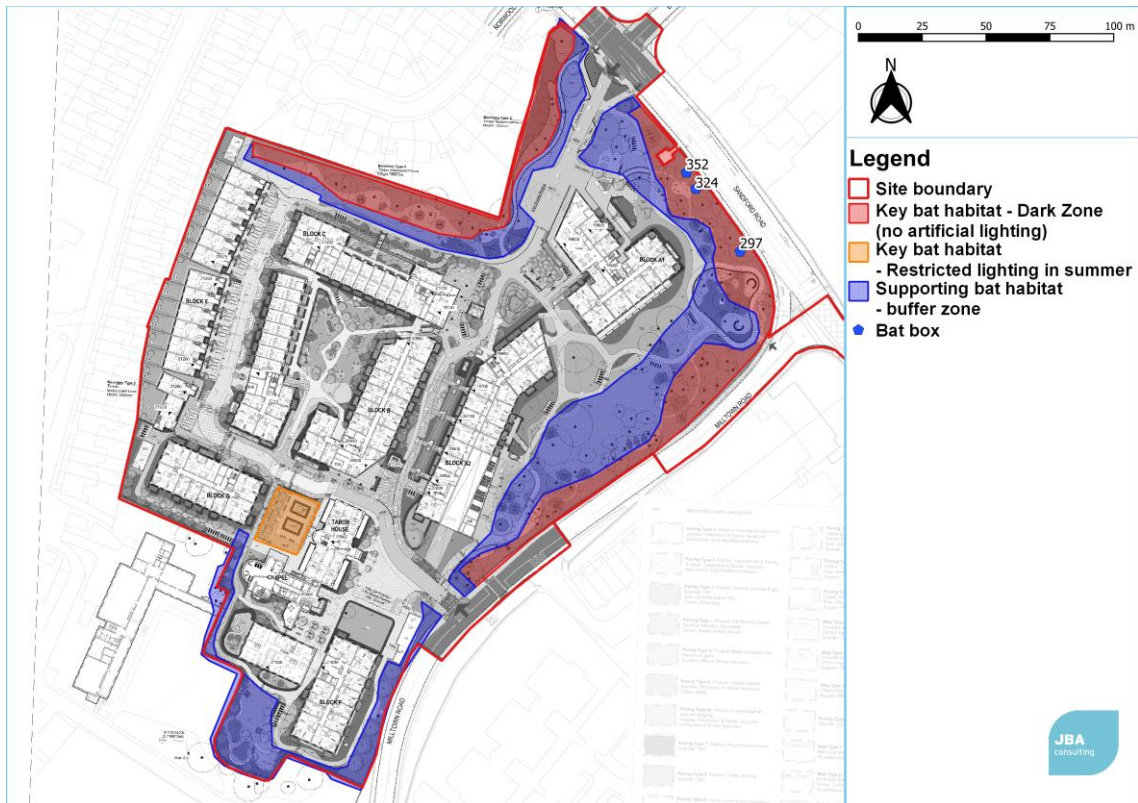
#### 8.10.3.1 Bats

##### *Lighting*

A dark corridor will be maintained around the boundary of the site to provide commuting and foraging habitat for bats (Figure 8.21). The key bat habitats include the woodland surrounding the site in the north and east which was identified as bat commuting habitat during the activity surveys and it connects the site to adjacent gardens and potential commuting routes outside of the site.

The second key bat habitat which is located to the west of Tabor House was identified as an important foraging area for bats during the activity surveys. This area will be planted with a wildflower meadow and fruit trees to attract insects and provide foraging opportunities for bats. The Holly treeline in the centre of the site was also identified as a commuting route for bats, however this will be removed as part of the new development. The key bat habitats including the woodland along the north and eastern boundary will not be lit by artificial lighting and the key bat foraging area of wildflower meadow west of Tabor house will have restricted lighting with light turned off at curfew time 22:30 during the summer months May to September inclusive. The open public space will act as supporting habitat providing a buffer zone around the key habitat and connecting the woodland with the wildflower meadow. The lighting in the buffer zone will be restricted, details are provided in the section below.

The dark corridor will maintain the sites connectivity with the surrounding area, providing connectivity with the wider urban landscape.



**Figure 8.21:** Dark corridor for bats including key habitat where no artificial lighting or restricted lighting in summer is provided. The supporting habitat will act as a buffer zone where restrictions to the lighting is incorporated.

(Source: JBA Consulting)

The following design mitigation is incorporated into the Lighting Report and Drawings prepared by Pritchard Themis which will alleviate the risk of light disturbance to bats.

- Hours of illumination:

Feature lighting of trees and on the west side facades of Tabor House and the Chapel will be turned off at curfew 22:30 all year round. Lighting in the formal garden area (wildflower meadow) west of Tabor House and the Chapel is set to turn off at this curfew during summer months May to September inclusive.

- Light levels and type:

The specification and colour temperature of light treatments is chosen based on their tolerability by bats. UV free LED luminaires will be used as they are ideal due to their sharp cut-off, lower intensity, and dimming capability. A warm white spectrum (no higher than 3000K) will be used to reduce the blue light component. The LED luminaires will also feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to the Bats.

Bollards that sit within the buffer zone of the dark corridor will have a light output set to a down-rated driver to ensure a lower lux level.

Street lighting in the area behind Building F is within the buffer zone of the dark corridor and will be set to average at a maintained average of 5 lux.



- Column heights of lamp posts and direction of light:

As bats most likely forage and commute in the unlit areas surrounding the site, the following measures are in place to reduce the amount of light spillage where it is not needed:

- The height of lamp columns will be 6m or less.
- Lighting will also be directed away from retained vegetation, i.e. the woodland.
- The use of uplighting will be restricted to the central route between the proposed buildings. Any uplighters will be fitted with louvres to control light spill. Downlighting will be used in locations close to the woodland and retained vegetation. Uplighting of trees and west side facades of Tabor House and the Chapel will be turned off at 22:30 during summer months.
- Bollards with a height of 800mm will be used on tertiary pedestrian routes, including the footpath along the woodland. The bollards along the woodland will have a spacing of 9-13m apart. The footpath surface will be of a natural material which does not create a reflection, minimising any potential upward reflection of the light.

Although it is deemed unlikely that light emitted from buildings will significantly impact on potential foraging and commuting areas for bats as these will largely lie along the extremities of the site, particularly along the north and eastern site boundary; night-time light spill from the interiors of the proposed buildings via windows/entrances; and the levels of spill/glare from outdoor lighting in place on the building exterior and throughout the site; will be minimised through selective lighting measures (such as fittings set back into the room) utilised for units facing towards the buffer zone, see Figure 8.22 below.

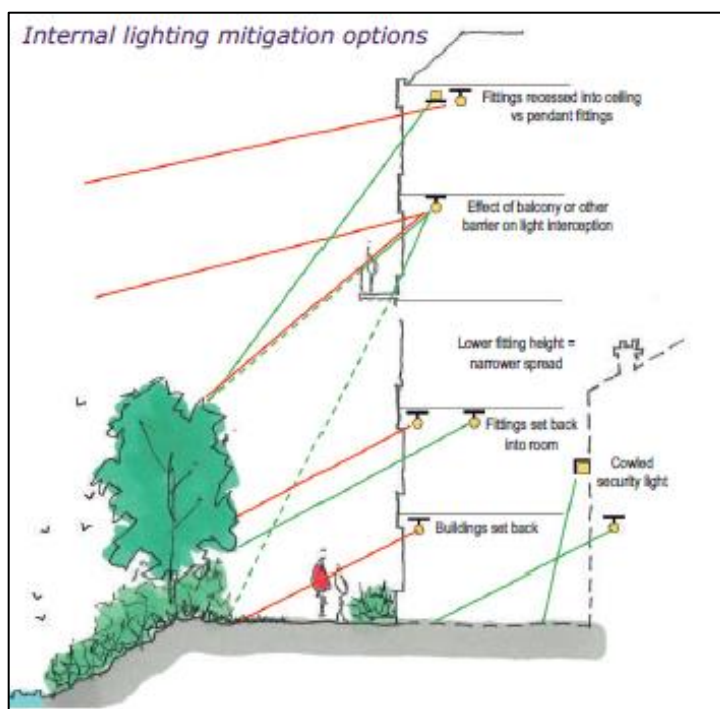


Figure 8.22: Mitigation options for internal lighting

(Source: ILP, 2018)



### *Loss of habitat*

The grassland to the western side of The Chapel and Tabor House was frequently used by foraging bats during the surveys. This area will be planted with wildflower meadow from native wildflower seed mix and an orchard (*Malus* spp.) which will provide valuable resource for pollinators and thus continue to provide foraging resource for bats. Green roofs planted with suitable species that support invertebrates can offer additional foraging habitat for bats. The restricted lighting in the buffer zone (supporting habitat) will ensure that bats can commute between the woodland and foraging area west of The Chapel and Tabor House.

### *Enhancement measures*

Bat boxes will be installed on mature trees present within the woodland (Arboricultural Tag Number: 297, 352 and 324). Ivy will have to be removed from the area surrounding the placement of each Bat box (1m radius). It is recommended that large multi chambered bat boxes are used (e.g. <https://www.nhbs.com/large-multi-chamber-woodstone-bat-box> or similar) as it is likely to benefit species identified on site, including Common Pipistrelle, Soprano Pipistrelle, Leisler's Bat and potentially some Myotis Bat species. Green roofs planted with suitable species that support invertebrates can offer additional foraging habitat for bats.

## **8.11 Residual Impact**

Residual ecological impacts are those that remain once the development proposals have been implemented. The main aim of ecological mitigation, compensation, and enhancement is to minimise or eliminate residual impacts.

### **8.11.1 Do Nothing Scenario**

The site in its present form is a former Jesuit Community not in use with open grassland, treelines and a small woodland. Under current use there is a neutral effect on the general ecology of the area.

### **8.11.2 Construction Phase**

The development will require removal of vegetation within the site. This will reduce the extent of a range of habitats, including mixed broadleaved, conifer woodland, treelines, scrub and grassland. This also has the potential to impact on Dodder Valley pNHA by resulting in reduced connectivity when greenspace is decreasing in the urban area. The removal of vegetation could also affect wildlife, such as terrestrial mammals, bats and birds by direct mortality, loss of potential roosting, nesting, commuting and foraging habitat. Implementation of mitigation measures during the construction phase includes protection of retained vegetation and planting of native shrubs, trees and wildflowers within the site. The planting of native shrubs as groundcover in the woodland will provide habitat for mammals and breeding birds and strengthen the boundary woodlands function as a green infrastructure corridor, securing the connectivity with Dodder Valley pNHA.

Measures in place to protect mammals, including Badger, Hedgehog and Pygmy Shrew during construction include clearing away of material not in use, covering of pipes to prevent animals getting trapped and removal of vegetation on a rotational basis to provide cover. Removal of vegetation will take place outside of the bird nesting season.

There will be a loss of potential bat roost habitats due to removal of tree with Tag No. 311 and the demolition of existing building (Milltown Park House). These will be re-inspected prior to removal/demolition by a qualified ecologist. If they are deemed to be providing bat roosts a derogation licence is required to proceed with the works. Soft felling technique will be applied when felling the tree and bats will be excluded from the building before demolition can take place. Bat boxes will be installed on trees within the woodland and thus mitigate for these potential losses.

The site has surface water connectivity with River Dodder and its aquatic receptors (fish) and with Dublin Bay and the following pNHAs: Booterstown Marsh, The Dolphins, Dublin Docks and Dalkey Coastal Zone and Killiney Hill. However, impact on surface water features will be negligible to neutral. Any suspended solids will naturally settle within the drainage pipes and hydrocarbons will dilute to background levels (water quality objectives as outlined in S.I. No. 272 of 2009 and S.I. No. 77 of 2019 amendment); by the time the stormwater reaches any open water based on the distance to waterways.

Artificial lighting during construction has the potential to cause disturbance to bats and reduce quality of foraging and commuting habitat. Works will be restricted to daytime hours, however there might be a need for out-of-hours work in some circumstances and thus require lighting. Lighting used will be LED luminaires in warm white spectrum (2700 K – 3000 K) to reduce the blue light composition.

Wintering birds have not been identified to use the site and the site is assessed unsuitable as feeding habitat for wintering birds. Any impact is likely to be negligible.

The residual impact during the construction phase is assessed to be of negligible impact.

### 8.11.3 Operational Phase

Lighting of vegetation and reduction of vegetation within the site could impact on the quality of habitats, such as mixed broadleaved, conifer woodland, treelines, scrub and grassland, making the site less suitable for bats and terrestrial mammals. Measures are in place to compensate for the loss of habitats, including enhancing the cover of scrub in the woodland with native species and planting of native tree species within the site which will ensure the sites functions to provide habitat potential for a range of species of mammals such as Badger, Hedgehog and Pygmy Shrew, birds and insects, and provide a wildlife corridor securing connectivity to River Dodder, Dodder Valley pNHA and other open green space in the urban area.

Bat friendly lighting will be implemented and foraging habitat will be provided, including planting of wildflowers and apple trees. Green roofs planted with suitable species that support invertebrates can offer additional foraging habitat for bats. This will ensure that key bat habitats are maintained at a good quality and will minimise any potential negative impact on this species group.

The site was not identified as providing habitat for wintering birds and it is not within any known flight line of sensitive bird species. Therefore, the buildings are not likely to cause collision. The impact on wintering birds is likely to be neutral.

Emission from traffic during operation will not have a significant impact on air quality and will not impact on habitats within the site.

The residual impact during the operation phase is assessed to be of negligible impact.

## 8.12 Potential Cumulative Impacts

Potential sources of cumulative impacts were identified based on the ecology of valued ecological features. Potential sources of cumulative impacts were sought within ranges, territories or catchments where there is the potential for a significant impact on a site or species. The following plans and projects were identified as potential sources of cumulative impacts or in-combination impacts:

### 8.12.1.1 The Dublin City Development Plan (2016-2022)

Dublin City Development Plan 2016-2022 sets out aims policies and objectives for the proper planning and sustainable development in the city. The Plan seeks to develop and improve, in a sustainable manner, the social, economic, cultural and environmental assets of the City (Dublin City Council, 2016).

To achieve a green, connected City and more sustainable neighbourhoods in line with the core strategy of the Plan the strategic approach will aim at (Dublin City Council, 2016):

- Implementing a 'green infrastructure' strategy
- Creating sustainable connectivity between green areas
- Providing for the recreational and amenity needs of the population

It is the policy to develop the green infrastructure network through the city where linear parks and waterways play an important role in connecting existing open spaces.

Policies and objectives of the City Development Plan relating to the protection of biodiversity within the city are outlined below:

- G12: That any plan/project, either individually or in combination with other plans or projects that has the potential to give rise to significant effect on the integrity of any European site(s), shall be subject to an appropriate assessment in accordance with Article 6(3) and 6(4) of the EU Habitats Directives.
- G14: To co-ordinate open space, biodiversity and flood management requirements, in progressing a green infrastructure network.
- G10: To continue to manage and protect and/ or enhance public open spaces to meet the social, recreational, conservation and ecological needs of the city and to consider the development of appropriate complementary facilities which do not detract from the amenities of spaces.
- G123: To protect flora, fauna and habitats, which have been identified by Articles 10 and 12 of Habitats Directive, Birds Directive, Wildlife Acts 1976–2012, the Flora (Protection) Order 2015 S.I No. 356 of 2015, European Communities (Birds and Natural Habitats) Regulations 2011 to 2015.
- G124: To conserve and manage all Natural Heritage Areas, Special Areas of Conservation and Special Protection Areas designated, or proposed to be designated, by the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.
- G125: To make provisions for habitat creation/ maintenance and facilitate biodiversity by encouraging the development of linear parks, nature trails, wildlife corridors, urban meadows and urban woodlands.
- G126: To have regard to the conservation and enhancement of significant non-designated areas of ecological importance in accordance with development standards set out in this plan.

- GI27: To minimise the environmental impact of external lighting at sensitive locations to achieve a sustainable balance between the needs of an area, the safety of walking and cycling routes and the protection of light sensitive species such as bats.
- GI28: To support the implementation of the Dublin City Tree Strategy, which provides the vision for the long-term planting, protection and maintenance of trees, hedgerows and woodlands within Dublin City.
- GI29: To adopt a pro-active and systematic good practice approach to tree management with the aim of promoting good tree health, condition, diversity, public amenity and a balanced age-profile.
- GIO1: To integrate Green Infrastructure solutions into new developments and as part of the development of a Green Infrastructure Strategy for the city.
- GIO2: To apply principles of Green Infrastructure development to inform the development management process in terms of design and layout of new residential areas, business/ industrial development and other significant projects.
- GIO17: To seek the continued improvement of water quality, bathing facilities and other recreational opportunities in the coastal, estuarine and surface waters in the city and to protect the ecology and wildlife of Dublin Bay.
- GIO23: To support the implementation of the 'Dublin City Biodiversity Action Plan 2015–2020', including inter alia (a) the conservation of priority species, habitats and natural heritage features, and (b) the protection of designated sites.
- GIO24: To develop Biosecurity Codes of Practice to deal with invasive species and ensure compliance with EU (Birds and Natural Habitats) Regulations 2011 and EU Regulations 2014 on the prevention and management of the introduction and spread of invasive alien species.
- GIO27: To protect trees, hedgerows or groups of trees which function as wildlife corridors or 'stepping stones' in accordance with Article 10 of the EU Habitats Directive.

The City Development Plan is designed to be taken in conjunction with other similar plans and programmes, to have the overall effect of strengthening the management of and enhancing the protection and conservation of Natura 2000 sites (SACs and SPAs). Specific statements, policies and objectives are formulated within the Plan to allow the Council to take appropriate steps to avoid the deterioration of Natura 2000 sites.

#### **8.12.1.2 Greater Dublin Drainage Strategy**

The Greater Dublin Drainage Strategy sets out the strategic planning for the development of waste water treatment in the Greater Dublin area in relation to the Ringsend WWTP Upgrade, Greater Dublin Drainage Project and associated wastewater network drainage projects (Irish Water, 2018b). The Ringsend WWTP Upgrade includes plans to expand the WWTP to its ultimate capacity, together with associated network upgrades required. The Greater Dublin Drainage Project is planned to relieve both the Ringsend WWTP and network loading by construction of a new WWTP at Clonshaugh, an orbital sewer and provision of an outfall pipe discharging 1km north east of Ireland's Eye.

The Ringsend WWTP upgrade is in progress and carried out in stages, with an increased capacity of 400,000 PE by first half of 2021 and the ultimate capacity of 2.4 million PE to be in operation by 2025 (Irish Water, 2021).

The Greater Dublin Drainage Project is strategically important to the Dublin Region in that it will provide capacity for residential and commercial growth (Irish Water, 2018b).

### 8.12.1.3 River Basin Management Plan for Ireland 2018-2021

The River Basin Management Plan (RBMP) for Ireland 2018-2021 sets out the actions that Ireland will take to improve water quality and achieve 'good' ecological status in water bodies (rivers, lakes, estuaries and coastal waters) by 2021 (DoHPLG, 2018a). Changes from previous River Basin Management Plans is that all River Basin Districts are merged as one national River Basin District. The Plan provides a more coordinated framework for improving the quality of our waters — to protect public health, the environment, water amenities and to sustain water-intensive industries, including agri-food and tourism, particularly in rural Ireland.

### 8.12.1.4 Other Projects

Other permitted and proposed projects (home extensions and retention not included) within the vicinity of the site which have been constructed, are in the course of construction or have not yet commenced have been considered and were searched for at Myplan.ie. These are as follows:

**Planning App. Ref.** 2124/20

**Location** Muckross Park College, Marlborough Road, Dublin 4

**Description:** The development will consist of construction of a single storey extension, of approx. total 120 sqm, to the rear (South) of the existing school to provide additional canteen facilities together with ancillary areas and associated site works

**Permission:** Granted 20/03/2020

**Planning App. Ref.** WEB1065/19 (ABP reg. ref. ABP-304727-19)

**Location** Gonzaga College

**Description:** For development at this site, Gonzaga College, Sandford Road, Dublin 6, Do6 KF95. The construction will consist of the installation of a new 3g artificial turf pitch capable of accommodating full size rugby and football over the site on an existing natural grass pitch within the playing fields at Gonzaga College. The development will comprise of a new 3g pitch, ball stop fencing system up to 5m in height, 6/8 columns floodlighting system up to 18m in height, spectator hardstanding with 1.2m fencing and new 3m wide hardstanding access from existing car park accommodating maintenance vehicles.

**Permission:** Granted 09/10/2019

**Planning App. Ref.** 3159/17

**Location** Lands at the former Paper Mills site, bounded by the River Dodder to the East, Clonskeagh Road to the West, Clonskeagh Bridge to the South West, Dublin 6

**Description:** Planning permission for the following revisions to the previously approved development (Reg. Ref. 2308/16). The revisions to the development consisting of an increase in apartment units from 96 to 116, the following changes are proposed: Block 1 - elevation and plan revisions to increase the building height to the southern end, adjacent to block 2 from 3 storeys with set back penthouse to 4 storeys with set back penthouse, incorporating an increase in apartment units from 24 to 27 (01 No. one bed unit, 02 No. two bed units) and alterations to the penthouse to include the omission of 01 No. two bed unit and internal alterations to change from a two bedroom to a three bedroom unit, Block 2 - elevation and plan revisions to increase the building height from 3 storeys with set back penthouse to 4 storeys with set back penthouse, incorporating an increase in apartment units from 51 to 65 (04 No. one bed units and 10 No. two bed units), Block 4 - elevation and plan revisions to



increase the building height from 3 storeys with set back penthouse to 4 storeys with set back penthouse, incorporating an increase in apartment units from 11 to 14 (03 No. two bed units), internal alterations to the basement carpark layout are also proposed to provide 30 No. additional car park spaces & additional bicycle parking spaces for use by the additional units.

**Permission:** Granted 27/09/2017, Final grant by ABP 04/07/2018

**Planning App. Ref.** 2115/19

**Location** Alexandra College, Richmond Avenue South, Milltown, Dublin 6, Do6 KX50

**Description:** Permission for development and for retention permission at this site of 6.4317 ha located at Alexandra College, Richmond Avenue South, Milltown, Dublin 6, Do6 KX50. The proposed development will consist of the: construction of a 97 No. bedroom part-three, part-four storey dormitory building (4,701 sq m gross floor area) (providing a total of 203 No. bed spaces) including study halls, rehearsal rooms, recreational rooms, administration areas, storage, a plant enclosure at roof level; and ancillary floor areas over all floor levels (ancillary space includes areas such as circulation cores (lifts and stairs), toilets, plant areas throughout the building, switch rooms etc.). The development will also consist of the construction of a new internal campus road and relocation of car and coach parking; improvement works to the campus entrance on Milltown road to include a set-back gateway, associated canopied pedestrian entrance and an additional pedestrian entrance; provision of a drop-off/collection area including ancillary car parking spaces; provision of pedestrianised areas including the use of part of the existing internal roadway (to be decommissioned); provision of bicycle parking spaces; boundary treatment works; signage; lighting; all hard and soft landscaping; and all other associated site excavation; infrastructural and site development works above and below ground; including changes in level and associated retaining features; boundary treatments and associated site servicing (foul and surface water drainage and water supply). The development will also consist of the demolition of a number of structures required to facilitate the construction of the proposed internal access road and dormitory including: the existing Caretaker's storage building (110 sq m gross floor area); the existing Caretaker's house (The Bungalow, Do6 CK09 (94 sq m gross floor area); and partial demolition (44 sq m) of the Principal's residence (Do6 V9T7). The development will also consist of: the relocation of the permitted pre-school log cabin within the campus and an extension of its temporary permission (granted under Reg. Ref. 3124/15) for an additional period of 5 No. years from October 2020 to 2025. The development for which retention permission is sought comprises temporary changing facilities associated with the sports ground (3 No. containers measuring 29.44 sq.m each). The development will also consist of: the relocation of those changing facilities within the campus and temporary permission for same for a period of 5 No. years. No works are proposed to the Richmond South entrances. (For clarity, the proposed development does not comprise Strategic Housing Development as Alexandra College is not a Third-Level Education Institution).

**Permission:** Granted 20/03/2019

**Planning App. Ref.** 3144/18

**Location** Site within the overall RDS Lands, Ballsbridge, Dublin 4

**Description:** The proposal will comprise: A) Demolition of the existing Anglesea Stand and Anglesea Terrace structure (approx.7,716sq.m.), 'lean-to' open fronted shed bounding Simmons Court Road (approx. 145sq.m.) and removal of modern terrace (approx. 44sq.m.) area surrounding the clock tower (a protected structure); B) Provision of a new grandstand (7,332.2sq.m.) over 3 levels, 21.3m [26.8m OD] in height (with associated floodlighting and acoustic public address within roof of new stand) with a connection (via a glazed bridge link at level 01) to the pocket building of (1,204.3sq.m. GFA) comprising a 2 level (storey) 9.91m [15.41m OD] in height building with plant (89sq.m.) at roof level (within a louvered cover - overall height 10.66m 16.12m OD)) to the east. The proposal will include the following flexible

ancillary accommodation net sq.m. areas (for new grandstand and pocket building): security/control rooms (c.13.3m); media, players and officials facilities (c. 356.7sq.m. [217.8sq.m. in horseshow model]); corridor/circulation areas (c.74.7sq.m. [30.7sq.m. in horseshow model]); bar/server areas (c.994.2sq.m. [1,185.8sq.m. in horseshow model]); WC facilities [including disabled & staff facilities] (c.719.7sq.m.); stores/coldrooms (c.217.7sq.m.); season ticket/VIP hospitality areas (c.56.1sq.m.); ancillary plant/electric areas (c.109.5sq.m.); the internal arrangement of the pocket building (and ancillary areas) will be flexible to accommodate rugby and horse show requirements/events; C) A single storey substation (c.18.4sq.m.) 3.6m. in height [9.92m OD] located to the east of existing South Stand; and a single storey double height club shop (c.49.1sq.m.) 6.7m. in height [12.2m OD] located adjacent to existing RDS office building; D) Terrace areas level 00 (396sq.m.) and level 01 (92sq.m.) within pocket building on southern façade as well as views from all levels towards parade rings from grandstand and pocket building. E) Provision of signage zones (overall 135.5sq.m.) to north (16sq.m.) and south (115sq.m.) elevations of proposed Anglesea Stand and north (2sq.m.) and east (2.5sq.m.) elevations of proposed club shop; F) Revised landscaping to the north of Anglesea Stand and external areas; G) Revisions to surface water/drainage/attenuation/storage arrangements including all associated site development and landscaping works; and H) Access arrangements and parking provision as per the established layout and operation of the RDS complex.

**Permission:** Granted 21/08/2018

**Planning App. Ref.** 2189/20

**Location** Lands at Sandford Lodge (a Protected Structure), Sandford Close, Sandford Road, Dublin 6

**Description:** Permission for development on lands at Sandford Lodge (a Protected Structure), Sandford Close, Sandford Road, Dublin 6. The development will consist of the demolition (total c. 392 sqm GFA) of Block 5 (1 storey) and Block 6 (1 storey) (total 4 no. residential units) and the construction of a new residential scheme of 36 no. residential units in the form of 2 no. contemporary three storey terraces, comprising: 12 no. 1 bed A 1 storey (GIA c. 54.65 sqm) units, 12 no. 1 bed B 1 storey (GIA c. 57.76 sqm) units; and 12 no. 2 bed A 2 storey (GIA c. 110.29 sq.m) units. Each new residential unit has associated private open space in the form of a garden courtyard or terraces. Landscaping works to existing and proposed external amenity spaces (total c. 3,851 sq m) include an upgraded fire tender route with a wildflower meadow edge, a sunken garden area around the Protected Structure, a central formal garden and an outdoor seating area. The development shall be accessed via the existing vehicular access point from Sandford Close and will provide for the reconfiguration of the existing basement car park and surface level parking areas to comprise a total of 120 car parking spaces at basement level; 36 spaces at grade; 133 residential cycle parking spaces and 18 visitor cycle parking spaces. The proposed modifications reduce the total number of vehicle parking spaces on the overall site from 169 to 156 and increase the cycle parking spaces from 85 to 151. An ESB Meter room (c. 6 sqm) and bin store (c. 21.6 sqm) are proposed at surface level. The associated site and infrastructure works include provision for water services, foul and surface water drainage and connections; attenuation proposals; permeable paving; all landscaping works; boundary treatment; electrical services and associated ancillary works. All of the above within the overall Sandford Lodge residential development. The proposal and associated ancillary elements are located within the curtilage of a Protected Structure.

**Permission:** Granted 27/03/2021, Appealed to ABP (ref. ABP-307375-20)

**Planning App. Ref.** 307267 (ABP reg. ref. PL29S.307267)

**Location** Nos. 1, 3, 5, 7, 9, 11 Eglinton Road, Donnybrook, Dublin 4

**Description:** Demolition of buildings, construction of 148 no. apartments and associated site works.

**Permission:** Granted 31/08/2020 by ABP

**Planning App. Ref.** 3301/20 (ABP reg. ref. 309378-21)

**Location** 22-24, Donnybrook Road (former Kiely's Public House), Donnybrook, Dublin 4

**Description:** The application site is bound by Donnybrook Road to the south west, Mulberry Lane to the North West and Pembroke Cottages to the east.

The proposed development will consist of the demolition of all existing buildings on site (comprising the former Kiely's public house and outbuildings) and the construction of a mixed-use building of part 3 to part 7 storeys in height, above basement level. The development comprises a café/restaurant unit (GFA of 925sqm) at ground floor level and Build to Rent Shared Accommodation comprising 100 no. single occupancy shared living units (ranging from 18.25sqm to 275sqm), associated reception/concierge area and communal amenities and facilities, from basement to sixth floor level. The shared accommodation scheme includes resident support facilities including laundry, concierge/reception, management offices and bin storage area at basement and ground floor level, a multifunctional communal area at ground and first floor level and communal amenity space (kitchen/living/dining area) at each level to serve the shared living units. External open space is located within the courtyard at ground floor level and the roof terrace at fifth floor level. The developments include plant rooms, storeroom facilities and 152 no. bicycle parking spaces at basement level and a screened plant area at roof level. The development proposes relocating the existing ESB substation and switch room within the site from the Pembroke Cottages boundary to Mulberry Lane. The proposal includes foul and surface water drainage, signage, landscaping, and all associated site development and infrastructural works.

**Permission:** Granted 13/01/2021 by DCC, currently under appeal to ABP

**Planning App. Ref.** 3907/18

**Location** Alexandra College, Richmond Avenue South, Milltown, Dublin 6

**Description:** Works at Alexandra College including construction on a new internal campus road, relocation of existing car and coach parking, provision of additional bicycle parking spaces and the provision of improvement works to the campus entrance on Milltown Road to include a set-back gateway.

**Permission:** Granted 05/03/2019

**Planning App. Ref.** 3513/20 (ABP reg. ref. ABP-309720-21)

**Location** 25-27, Donnybrook Road, 1-3 The Crescent, Donnybrook, Dublin 4

**Description:** Planning permission is sought for development comprising: (i) The demolition of the existing single storey buildings at 25-27 Donnybrook Road and Nos. 1-3 The Crescent, Donnybrook, Dublin 4; (ii) The construction of an 8-storey mixed-use development consisting of the following uses: (a) 49 no. build-to-rent apartments, comprising of 44 no. one-bed apartments and 5 no. two-bed apartments (access from 1-3 The Crescent) and served by Resident's Communal amenity area comprised of external 256sqm (including roof terraces at 4th and 5th floors); Residents internal amenity area comprised of 142sqm gymnasium at Ground Floor; (b) 231sqm retail space at Ground Floor (access from 25-27 Donnybrook Road). The development features 84 no. bicycle spaces; a refuse storage, a plant room and an ESB

substation (all located at Ground Floor); landscaping and all associated site development works.

**Permission:** Granted 26/05/2021 (Appeals Withdrawn)

**Planning App. Ref.** No. 1: 2582/16, No. 2: 3312/20

**Location** 91, Belmont Avenue, Donnybrook, Dublin 4

**Description:** Demolition of existing sheds (c. 25 sq m) and construction of 4 No. detached houses at No. 91 Belmont Avenue. Revised ground floor rear extension to include a single storey rear return for a utility room to No. 91 Belmont Avenue

**Permission:** Granted 16/09/2016 and 09/12/2020

**Planning App. Ref.** 2244/21 (ABP reg. ref ABP-310204-21)

**Location** Lands (c 0.11 ha) at the junction of Donnybrook Road and Brookvale Road, Donnybrook, Dublin 4, Do4 K3T8

**Description:** Demolition of structures on site and construction of a 12 No. storey development including 84 apartments with retail and café/restaurant (570 sq m) at the junction of Donnybrook Road and Brookvale Road.

**Permission:** Refused 14/04/2021 by DCC, appealed to ABP (decision due 13/09/2021)

**Planning App. Ref.** 3939/19 (ABP reg. ref. ABP-306755-20)

**Location** The Rectory, Purser Gardens, Rathmines, Dublin 6, Do6 EoY5

**Description:** The demolition of the existing Rectory and the construction of 9 No. dwellings at The Rectory, Purser Gardens, Rathmines.

**Permission:** Granted 19/02/2020 by DCC, granted 09/09/2020 by ABP

**Planning App. Ref.** 4011/18 (ABP reg. ref. ABP-304085-19)

**Location** 1 Annesley Park, Dublin 6

**Description:** Permission is sought by Seabren Developments Ltd. for the development of a site of c.0.50 ha comprising a commercial premises former Deignan Bros Limited (Eircode Do6 Ho26) and curtilage to the rear of Annesley Park bounded by existing pedestrian lanes to the rear of Killeen Road, Ormond Road and Annesley Park, with access from Dunville Close, and alterations to boundary of No. 1 Annesley Park, (Eircode Do6 XW97) a Protected Structure, Ranelagh, Dublin 6. The development will consist of the demolition of all buildings on the former commercial site to the rear and the construction of a new residential development with access from the existing vehicular access road along Dunville Close, The proposed development includes widening the access road along Dunville Close, including demolition of boundary wall and shed to the rear and side of No. 1 Annesley Park (Eircode Do6 XW97), Dublin 6, a Protected Structure. The development will comprise 20 no. residential houses consisting of 11 no. 3 storey 4 bed houses and 9 number 2.5 storey 3 bed houses ranging in size from circa 187 sqm to 145 sqm each with rear gardens and terraces with (opaque glazed screening). Each house will have a parking space to the front together with 2 number visitor spaces for the development and bicycle parking, bin storages areas. The proposal also includes all associated site development works, roads and paths, landscaping boundary treatment, including works and repairs of existing boundary walls, rear pedestrian access to each dwelling, public lighting and piped service provision.

**Permission:** Granted 04/03/2019 by DCC, granted 04/11/2019 by ABP

**Planning App. Ref.** 2812/20

**Location** 23, Bushfield Terrace, Donnybrook, Dublin 4, Do4 V2RO

**Description:** Demolition of existing single storey structures to the side and rear. - Construction of single storey rear extension to the side and rear of the existing dwelling at No. 23 Bushfield Terrace, Donnybrook

**Permission:** Granted 09/09/2020

**Planning App. Ref.** 2412/19 (ABP reg. ref. ABP-305475-19)

**Location** The former Donnybrook Laundry at The Crescent, Donnybrook, Dublin 4, Do4 R856 and No. 17 The Crescent, Donnybrook Road, Dublin 4 Do4 A6Y7

**Description:** Permission for development on a site of approximately 0.26 hectares at the site of the former Donnybrook Laundry at the Crescent, Donnybrook, Dublin 4, Do4 R856 and No. 17 The Crescent, Donnybrook Road, Dublin 4, Do4 A6Y7. (A Protected Structure is located within the site: a chimney stack (RPS Ref. 8713) under the Dublin City Development Plan 2016-2022). The site is principally bounded by: the residential development 'Donnybrook Manor' and other terrace dwellings to the north; 'The Crescent' laneway (formerly known as Church Lane) a graveyard and Donnybrook Garda Station to the east; and by the lands associated with St. Mary's Convent to the south and west. The development will consist of the demolition of structures on site (1.166 sq.m gross floor area) other than: the chimney stack (Protected Structure RPS 8713; a two-storey building located at the south-eastern corner of the site identified as Building 03 on the Architects' drawings) (390 sq. m gross floor area); and No. 17 The Crescent, Donnybrook Road, Dublin 4, Do4 A6Y7 (an existing two-storey terraced dwelling) (115 sq.m gross floor area). The development will also consist of the construction of a residential scheme arranged in 3 No. new three-four storey blocks with habitable attic accommodation (identified at Buildings 01, 02 and 04 on the Architects' drawings (3,966 sq.m gross floor area) over basement (1,910 sq. m) and within the refurbished and adapted existing Building 03 (659 sq.m gross floor area) (with interventions to Building 03 including: provision of openings within the eastern, southern and western elevations to provide new windows and access points; and provision of a new roof) providing 44 no. apartments (comprising 11 no. one-bedroom apartments, 27 no. two-bedroom apartments, 5 no. two-bedroom duplex apartments and 1 no. three-bedroom duplex apartment). The proposed development will also consist of the provision of: ancillary floor areas over all floor levels (ancillary space includes areas such as circulation cores (lifts and stairs) and plant areas throughout the building, etc.); a central atrium (including circulation areas at all floor levels) with a glazed roof; a roof garden on Building 02 (153 sq.m); private (including terraces and balconies), communal and public open space areas; residents' storage facilities; waste storage facilities; vehicular and pedestrian access / egress and associated circulation routes (including a ramp to basement level; 46 no. car parking spaces (including 3 no. accessible spaces) at basement level; 80 no. bicycle spaces; 2 no. motorbike spaces; electric vehicle changing points; an ESB substation and switchroom; boundary treatments (including sections of new boundary wall); the widening and improvement of the existing vehicular entrance to the property from The Crescent; revised car parking arrangement and landscape design to the front of No. 17 The Crescent; provision of artwork; lighting; all hard and soft landscaping; the provision of Sustainable Urban Drainage systems (SUDs); and all other associated site excavation, infrastructural and site development works above and below ground, including changes in level and associated retaining features, boundary treatment and associated site servicing (foul and surface water drainage and water supply).

**Permission:** Granted 22/08/2019 by DCC, granted 29/01/2020 by ABP



- Planning App. Ref.** 2843/21
- Location** Royal Hospital Donnybrook, Morehampton Road, Donnybrook, Dublin 4, Do4 HX40
- Description:** Construction of Donnybrook Primary Care Centre at the Royal Hospital Donnybrook comprising 4 No. storeys over basement level accommodating HSE medical diagnostics, consulting and treatment rooms plus ancillary offices.
- Permission:** Request for additional information 16/07/2021 by DCC
- Planning App. Ref.** 2731/21 (alterations to DCC Reg. Ref. 3890/14 extended by DCC Reg Ref. 3890/14/X1-4 No. bedroom dwelling)
- Location** 1, Eglinton Square, Donnybrook, Dublin 4, Do4 E2W2
- Description:** Development comprising provision of a pedestrian entrance gate off Eglinton Road; (ii) provision of a temporary construction access off Eglinton Road; and (iii) all ancillary works necessary at Eglinton Square, Donnybrook.
- Permission:** Split decision (grant and refuse) 30/06/2021
- Planning App. Ref.** 2477/21
- Location** 47 Ranelagh Road, Ranelagh, Dublin 6
- Description:** The demolition of a single storey rear return and provision of 2 No. residential units; and the provision of a new part 2 to part 4 No. storey structure to the rear of the site accommodating 10 No. residential units at No. 47 Ranelagh Road.
- Permission:** Request for additional information 20/05/2021 by DCC
- Planning App. Ref.** 2762/21 (ABP reg. ref. ABP-310988-21)
- Location** 47-48 Chelmsford Road, Ranelagh, Dublin 6.
- Description:** Permission for alterations to the previously granted development (DCC Planning reference: 2246/20).  
The proposed alterations will consist of the construction of an additional storey set back from the front and side elevations, consisting of an additional 2-bedroom apartment at third floor level, with private balconies. There will be an increase in units from 6 to 7 apartments. Minor internal & external alterations are also proposed which includes changes to comply with Fire Safety and Disability Access requirements (bike and bin stores). The development will include all associated drainage, ancillary site works, bin store and services.
- Permission:** Refused 05/07/2021 by DCC, appealed to ABP
- Planning App. Ref.** 2704/21
- Location** St. Mary's Home, Pembroke Park and 28A Clyde Lane, Dublin 4
- Description:** Construction of 64 No. Build-to-Rent apartment units comprising 19 no. studio apartments, 41 no. one bedroom apartments and 4 no. two bedroom apartments at St. Mary's Home, Pembroke Park and 28A Clyde Lane
- Permission:** Request for additional information 24/06/2021 by DCC
- Planning App. Ref.** ABP reg. ref. ABP-310138-21 (SHD [www.msmshd.ie](http://www.msmshd.ie))

**Location** Mount Saint Mary's and Saint Joseph's, Dundrum Road, Dundrum, Dublin 14

**Description:** Demolition of existing buildings on site and part of the granite wall along Dundrum Road, excluding Small Hall and the construction of 231 No. apartments and a childcare facility at Mount Saint Mary's and Saint Joseph's, Dundrum Road, Dundrum, Dublin 14.

**Permission:** Granted by ABP 25/08/2021

### 8.12.2 Assessment of Potential Cumulative Impacts

Potential cumulative impacts upon local flora and fauna include loss of foraging, resting and commuting habitat, construction noise and lighting pollution.

The Dublin City Development Plan (2016-2022) sets out policies and objectives for a sustainable development in the city and aim to improve environmental assets of the city, thus the plan is not expected to have a cumulative impact on the proposed development.

Other larger developments in the vicinity (also listed in Other Projects 8.12.1.4), which may have cumulative impact include:

- 116 No. apartment development at former Paper Mills next to River Dodder, south of the proposed site;
- Student accommodation with 97 No. dormitory rooms and demolition of old buildings at Alexandra College;
- Converting an existing natural grass pitch into an artificial turf pitch and installation of flood lighting up to 18m in height at Gonzaga College, south west of the proposed development;
- Extension of single storey canteen facilities at Muckross Park College north of the proposed site;
- Demolition of existing Anglesea stand and terrace structure within the overall RDS lands at Ballsbridge, including provision of new grandstand, flood lighting and ancillary accommodation buildings;
- Demolition of 4 No. existing residential units and construction of a new residential scheme of 36 No. residential units on lands at Sandford Lodge;
- Demolition of buildings, construction of 148 No. apartments at Eglington Road;
- Demolition of buildings, construction of 100 No. single occupancy shared living units at Donnybrook Road (former Kiely's Public House);
- Mixed-use-development consisting of 49 No. build-to-rent apartments;
- 84 No. apartments with retail and café/restaurant (570 sq m) at the junction of Donnybrook Road and Brookvale Road; and
- Demolition of buildings, construction of 231 No. apartments and a childcare facility at Mount Saint Mary's and Saint Joseph's, Dundrum Road, Dundrum.

These developments could potentially have a cumulative impact during construction with increased noise disturbance and dust emissions. The habitats and species recorded within the site, or identified to likely inhabiting the site, are not sensitive to dust emissions. The prevailing wind is west, south west direction (Met Éireann, 2020) and all sites except Gonzaga College are located so that the general wind direction is away from the proposed site and dust from the other developments is not likely to settle within the proposed site. Therefore, it is not anticipated to have a significant cumulative impact on the identified ecological receptors.

The increased noise disturbance will be for the period of the construction phase of the projects and are restricted to daytime hours (Mondays to Fridays - 7.00a.m. to 7.00p.m. Saturday - 9.00a.m. to 1.00p.m.) which will minimise impact on sensitive species. Further, given the urban setting of the proposed site, it is expected that species in the area are used to human disturbance to some extent. Therefore, noise disturbance is not anticipated to have a cumulative impact with proposed mitigation measures in place.

The conversion to an artificial turf pitch at Gonzaga College will further reduce the area of available grassland habitat for wintering birds and installation of flood lighting may impact on nocturnal mammals, in particular commuting and foraging bats. However, conditions including the flood lights to minimise light spillage and supplementary planting along the western boundary, and the flood lights and pitch will not be used after 21:30. These conditions will minimise impact on bats in the area and in combination with mitigations for the proposed development at Milltown Park it is not expected to have a significant cumulative impact on the bats.

Cumulative impact on surface water receptors is also considered where increase in foul water from the developments will increase the load on Ringsend WWTP. The Hydrological and hydrogeological qualitative risk assessment provided by AWN Consulting states that the peak wastewater discharge from the proposed development is calculated at an average wastewater discharge of 0.6 litres/sec. In June 2018 Irish Water applied for (and subsequently received) planning permission for upgrade works to the Ringsend WWTP facility. These are currently on-going and will increase the capacity of the facility from 1.6 million PE to 2.4 million PE. This plant upgrade will result in an overall reduction in the final effluent discharge of several parameters from the facility including Biological Oxygen Demand (BOD), suspended solids, ammonia, Dissolved Inorganic Nitrogen (DIN) and Molybdate Reactive Phosphate (MRP). An Environmental Impact Assessment Report (EIAR) was submitted by Irish Water as part of this application. The EIAR contains sections relating to Marine Biodiversity and Terrestrial Biodiversity, and each contains a section on the 'do-nothing scenario'. These review the effects of the WWTP on biodiversity in Dublin Bay in the absence of the upgrade works and so are relevant to this report.

The EIAR report acknowledges that under the do-nothing scenario "the areas in the Tolka Estuary and North Bull Island channel will continue to be affected by the cumulative nutrient loads from the river Liffey and Tolka and the effluent from the Ringsend WWTP", which could result in a decline in biodiversity and the deterioration of the biological status of Dublin Bay (Irish Water, 2018b). Nevertheless, these negative impacts of nutrient over-enrichment are considered "unlikely" (Irish Water, 2018b). This is because historical data suggests that pollution in Dublin Bay has had little or no effect on the composition and richness of the benthic macroinvertebrate fauna. The EIAR notes that "although a localised decline could occur, it is not envisaged to be to a scale that could pose a threat to the shellfish, fish, bird or marine mammal populations that occur in the area." Furthermore, the EIAR notes that significant impacts on waterbird populations foraging on invertebrates in Dublin Bay due to nutrient over-enrichment are "unlikely" to occur (Irish Water, 2018b). What is important in the context of this Biodiversity Chapter is that the do-nothing scenario predicts that nutrient and

suspended solid loads from the WWTP will “continue at the same levels and the impact of these loadings should maintain the same level of effects on marine biodiversity” and that “if the status quo is maintained there will be little or no change in the majority of the intertidal faunal assemblages found in Dublin Bay which would likely continue to be relatively diverse and rich across the bay.”

AWN Consulting states the following in their report: *Even without treatment at the Ringsend WWTP, the peak effluent discharge, calculated for the proposed development as 0.6 litres/sec (which would equate to 0.005% of the licensed discharge at Ringsend WWTP [peak hydraulic capacity]), would not impact on the overall water quality within Dublin Bay and therefore would not have an impact on the current Water Body Status (as defined within the Water Framework Directive). This assessment is supported by hydrodynamic and chemical modelling within Dublin Bay which has shown that there is significant dilution for contaminants of concern (DIN and MRP) available quite close to the outfall for the treatment plant (Ringsend WWTP 2012 EIS, Ringsend WWTP 2018 EIAR). The most recent water quality assessment of Dublin Bay WFD Waterbody undertaken by the EPA (four yearly monitoring of trends for indicator parameters) also shows that Dublin Bay on the whole, currently has an ‘Unpolluted’ water quality status (www.catchments.ie).*

On examination of the above it is considered that there are no means for the Proposed Development to act in-combination with the current operation of Ringsend WWTP.

### 8.13 Monitoring Required

Following guidelines (NPWS, 2016) bat use of the site will be monitored for one year post construction to evaluate implemented measures to provide foraging and commuting habitat and roosting sites for bats. The monitoring should be carried out by a qualified Ecologist and take place in the summer months May – September in the form of activity surveys including transects and automatic static detectors.

### 8.14 Summary of Impact Assessment

The tables below present a summary of the assessment when mitigation approaches are considered and included. A more detailed description of mitigation measures is provided in the text above. Residual impacts are also described. Table 8.17 provides a summary of construction impact and Table 8.18 provides a summary of operation impacts.

**Table 8.17: Summary of Construction Impacts.**

Likely Significant Effect	Extent	Impact Without Mitigation					Summary of Mitigation Measures	Monitoring	Impact with Mitigation / Monitoring				
		Quality	Significance	Duration	Type	Probability			Quality	Significance	Duration	Type	Probability
Loss of connectivity for Dodder Valley pNHA	Regional	Negative	Minor to moderate	Medium to long-term	Cumulative	Likely	Retention of majority of boundary woodland and planting of native scrub in the understorey. Planting of trees including native species within the site. These measures will provide for connectivity within the site and ensure the sites function as wildlife corridor in the wider landscape.	N/A	Neutral	Not significant	Long-term	Residual	Unlikely
Vegetation removal and dust settling down on leaves reducing the photosynthesis ability impacting on: Mixed broadleaved/conifer woodland; Treelines; Scrub; Grassland	Local & regional	Negative	Moderate	Medium to long-term	Direct	Likely	Protection of retained vegetation, i.e. no works undertaken within the tree root protection zone and secure the regeneration of young trees within the woodland.  Planting of native species in the woodland understorey. Planting of trees, native and non-native mix, within the site. Implementation of green roofs on the new buildings of block A, B, C, D and F.  The grassland west of Tabor House, which at present is used for foraging by bats, will be planted with wildflower meadow from native wildflower seed to provide valuable resource for pollinators and thus continue to provide foraging resource for bats, although there will be a temporary loss of foraging habitat during construction before the wildflower meadow is established.	N/A	Neutral	Not significant	Short-term	Residual	Likely
Reduced water quality impacting on aquatic receptors (fish)	Regional	Neutral	Negligible, not significant	Temporary	Direct	Unlikely	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Loss of foraging and commuting habitat and; noise and human activity disturbance impacting on terrestrial mammals	Local	Negative	Minor	Short to medium-term	Direct	Likely	Limiting construction works to daylight hours where possible, thus minimising impact on nocturnal mammals.  Construction material not in use will be cleared away.  Pipes will be covered when not in use to prevent animals getting trapped.  Vegetation will be removed on a rotational basis to provide cover and nesting habitat.  The woodland on site will be retained and enhanced with native species planted in the understorey providing cover and foraging opportunities for mammals. Tree planting within the site will provide connectivity between the boundary habitats.	N/A	Neutral to negative	Not significant	Short-term	Residual	Unlikely
Loss of foraging and commuting habitat; loss of suitable roost habitats and; lighting disturbance impacting on bats	Local	Negative	Minor	Medium to long-term	Direct	Likely	Light will be switched off during non-working hours where possible and directional lighting will be used.  A warm white spectrum (2700 K – 3000 K) on light will be used to reduce the blue light component.  A pre-construction bat survey of the roof space of	N/A	Neutral to negative	Not significant	Short-term	Residual	Unlikely



							Milltown Park House and a re-examination of tree with Tag No. 311 will be conducted. If features are confirmed as not being suitable for use as roosts, then work can continue. If bats/evidence of bats/or suspected roosts are found, then these will be legally protected, and a derogation licence will be needed to move forward with the works with appropriate mitigation in place.  Bat boxes will be installed on trees present within the woodland. Ivy will have to be removed from the area surrounding the placement of each Bat box (1m radius).						
Noise and human activity disturbance and loss of foraging and nesting habitat impacting on breeding birds	Local	Negative	Minor	Short to medium-term	Direct	Likely	Any clearance of trees and scrub will be conducted outside of the bird nesting season (March to September inclusive).  Demolition or reroofing of buildings must take place outside of the bird nesting season (March to September included). If works are to take place in 2022, or years thereafter, it should take place outside of the bird nesting season or the chimneys should be bird proofed by a specialist contractor prior to nest building/egg laying and a new breeding bird survey by a qualified ecologist should take place before any demolition works start.  Planting of native shrubs and tree species within the site will compensate for loss of foraging and nesting habitat. Bird boxes will be installed within the woodland.	N/A	Neutral	Not significant	Temporary	Residual	Unlikely

Table 8.18: Summary of Operation Impacts.

Likely Significant Effect	Extent	Impact Without Mitigation					Summary of Mitigation Measures	Monitoring	Impact with Mitigation / Monitoring				
		Quality	Significance	Duration	Type	Probability			Quality	Significance	Duration	Type	Probability
Dust settling down on leaves reducing the photosynthesis ability impacting on the following habitats: Mixed broadleaved/conifer woodland; Treelines; Scrub; Grassland	Local	Neutral	Negligible, not significant	Long-term	Direct	Unlikely	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Noise and human activity disturbance and; loss of foraging and commuting habitat impacting on terrestrial mammals	Local	Negative	Minor	Short to medium-term	Direct	Likely	The woodland on site will be retained and enhanced with native species planted in the understorey providing cover and foraging opportunities for mammals. Tree planting within the site will provide connectivity between the boundary habitats.	N/A	Neutral	Not significant	Temporary	Residual	Unlikely
Lighting disturbance and loss of foraging and commuting habitat impacting on bats	Local	Negative	Minor	Long-term	Direct	Likely	A dark corridor will be maintained around the boundary of the site to provide commuting and foraging habitat for bats. The following design mitigation will be adhered to which will alleviate the risk of light disturbance to bats.  Hours of illumination: Feature lighting of buildings and trees will be turned off at curfew 22:30 all year round. Lighting in the formal	Monitoring one year post construction to evaluate implemented measures to provide foraging and commuting habitat and roosting sites for bats. The monitoring should be carried out by a suitably qualified ecologist and take place in the summer months May – September in the form of activity surveys including transects and automatic static detectors.	Neutral	Not significant	Short-term	Residual	Unlikely

							<p>garden area (wildflower meadow) west of Tabor House and the Chapel is set to turn off at this curfew during summer months May to September inclusive.</p> <p>Light levels and type: The specification and colour temperature of light treatments is chosen based on their tolerability by bats. LED luminaires will be used and are ideal due to their sharp cut-off, lower intensity, and dimming capability. A warm white spectrum (no higher than 3000 K) will be used to reduce the blue light component.</p> <p>Column heights of lamp posts and direction of light: As bats most likely forage and commute in the unlit areas surrounding the site, the following measures are in place to reduce the amount of light spillage where it is not needed:</p> <ul style="list-style-type: none"> <li>- The height of lamp columns will be 6m or less.</li> <li>- Lighting will also be directed away from retained vegetation, i.e. the woodland.</li> <li>- The use of uplighting will be restricted to the central route between the proposed buildings. Any uplights will be fitted with louvres to control light spill. Downlighting will be used in locations close to the woodland and retained vegetation. Uplighting of single trees and buildings will be turned off at curfew.</li> <li>- Bollards with a height of 800mm will be used on tertiary pedestrian routes, including the footpath through the woodland. The bollards in the woodland will have a spacing of 9m-13m apart.</li> </ul> <p>The area west of Tabor House will be planted with wildflower meadow from native wildflower seed to provide valuable resource for pollinators and thus continue to provide foraging resource for bats.</p> <p>Bat boxes will be installed on trees present within the woodland. Ivy will have to be removed from the area surrounding the placement of each Bat box (1m radius).</p>							
Noise and human activity disturbance impacting on breeding birds	Local	Neutral	Negligible, not significant	Long-term	Direct	Unlikely	N/A	N/A	N/A	N/A	N/A	N/A	N/A	

### 8.15 Interactions

The full assessment of interactions is provided in Chapter 19 of the EIAR, outlined below are interactions relevant to Biodiversity. Interactions between Biodiversity and other environmental factors of the EIAR have been identified with the following sections: Landscape; Land, Soils and Geology; Air Quality; Population and Human Health; and Archaeology.

#### *Landscape*

The retained open space within the site will provide amenity areas for residents, including play areas, fitness areas and benches. This will involve thinning of trees within the woodland which, without mitigation, could impact on wildlife in the area for which the woodland provides cover and foraging ground. Mitigation measures involve planting of native shrubs in the understory which will enhance the woodland structure and planting of 238 No. new trees across the site. The planting of native shrubs will enhance the understory in the woodland as it presently is dominated by non-native shrub species. Many of the removed trees will be replaced with native tree species. These measures will provide habitat for wildlife to safely commute and nesting opportunity for birds.

Therefore, the interactions between biodiversity and landscape is considered to be long-term, slight and neutral.

#### *Land, Soils and Geology, Air Quality*

The works involve stripping of topsoil and excavations, which will remove vegetation such as trees and scrub. It will also generate dust and potentially impact on the air quality in the locality. However, the generation of dust will be temporary during construction phase and is not anticipated to have a significant impact on biodiversity.

The impact of the interactions between land, soils and geology, air quality and biodiversity are considered to be short-term, imperceptible and neutral.

#### *Population and Human Health*

The retained open space within the site will provide amenity areas for residents, including play areas, fitness areas and benches. This will involve thinning of trees within the woodland which, without mitigation, could impact on wildlife in the area for which the woodland provides cover and foraging ground. Mitigation measures involve planting of native shrubs in the understory which will enhance the woodland structure and planting of 238 No. new trees across the site. These measures will provide habitat for wildlife to safely commute and nesting opportunity for birds.

Interaction with population and human health involves the provision of lighting to provide a safe outdoor realm for residents which, without mitigation, could impact on nocturnal species, such as bats. Mitigation measures include the provision of a dark corridor with restricted lighting and a lighting design minimising impact on bats and other nocturnal animal, providing suitable commuting and foraging habitat.

With the implementation of the outlined mitigation measures, the interaction between population/human health and biodiversity will be long-term, not significant and neutral.

### *Archaeology*

Interaction with archaeology relates to the construction phase where archaeological monitoring could record archaeological material adjacent to preserved mature trees. However, the potential impact on individual trees due to any archaeological findings is not anticipated to have a significant impact on the overall biodiversity on site.

The impact of the interactions between archaeology and biodiversity is considered to be long-term, not significant and neutral.

#### **8.16 Difficulties Encountered**

There were no difficulties encountered in compiling the information for Chapter 8 Biodiversity.

#### **8.17 Conclusion**

The construction and operation of this proposed development has been shown to potentially impact a number of different habitats with regional (mixed broadleaved/conifer woodland, treelines) and local importance (amenity grassland, scrub) and faunal groups (terrestrial mammals, bats, breeding birds), who's ecological importance ranges from local to regional.

Based on the information supplied regarding the site layout, drainage, landscaping, lighting; and provided that the proposed development is constructed in accordance with the mitigation measures outlined above, there will be no significant impact in combination with other projects and plans, as a result of the development and associated works on the ecology and local species of the area and in particular on the following designated conservation sites:

- Dodder Valley pNHA
- Booterstown Marsh pNHA
- The Dolphins, Dublin Docks pNHA
- Dalkey Coastal Zone and Killiney Hill pNHA

Furthermore, enhancement measures will include substantial supplementary planting/sowing of trees, shrubs and wildflowers within the proposed development site and bird boxes, bat boxes and insect hotels will be installed within the site. These measures are all outlined in the Landscape Design Statement (Sandford DAS) provided by Cameo & Partners.

#### **8.18 References**

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