

4 Consideration of Alternatives

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4.1 Introduction

This chapter has been prepared by Brock McClure Consultants.

The requirement to consider alternatives within an EIAR is set out in Annex IV (2) of the EIA Directive 2014/52/EU amended Directive 2011/92/EU and in Schedule 6 of the Planning and Development Regulations, 2001, as amended. The Directive states as follows:

*“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.”*

In addition, Schedule 6, para. 2 (b) of the Regulations implement this requirement by requiring the following information –

(b) a description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) 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 selecting the chosen option, including a comparison of the environmental effects;

Reasonable alternatives may include project design proposals, location, size and scale, which are relevant to the proposed development and its specific characteristics. The Regulations require that an indication of the main reasons for selecting the preferred option, including a comparison of the environmental effects to be presented in the EIAR.

The Department of Housing, Planning and Local Government (2018) *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment* states;

‘The Directive requires that information provided by the developer in an EIAR shall include a description of the reasonable alternatives studied by the developer. These are reasonable alternatives which are relevant to the project and its specific characteristics. The developer must also indicate the main reasons for the option chosen taking into account the effects of the project on the environment.

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

As such, the consideration and presentation of the reasonable alternatives studied by the project design team is an important requirement of the EIA process.

This chapter provides an outline of the reasonable alternatives examined during the design phase. It sets out the reasons for choosing the development as proposed, taking into account and providing a comparison on the environmental effects.

4.2 Rationale for Proposed Development

The key concepts which have informed the development of the Proposed Residential Development include the following:

- The arrangement of the buildings to give structure and form to the principal spaces and vistas;
- The modulation of the building forms to take maximum advantage of the views and orientation;

- The use of variety and distinctiveness in the architecture to create a sense of place by means of a range of building sizes, shapes, heights, materials and character;
- The provision of appropriately scaled, well orientated and 'people-friendly' external spaces including landscaped streets, courtyards, gardens and pedestrian streets;
- The creation of a clearly defined hierarchy of public, semi-public and private spaces which provide legibility, permeability and connectivity and make it easy for residents and visitors to find their way around. Giving priority to walking, cycling and public transport, minimising the need for cars by providing attractive paths and cycle routes which facilitate safe access by users of all ages and degrees of personal mobility;
- The promotion of energy efficiency by use of good quality external materials and insulation, efficient heating systems, use of green roofs, and sustainable water use and drainage design.
- The presence of the Protected Structure St. Joseph's House and its proximal location to Arkle Square which is an Architectural Conservation Area (ACA) south west of the subject site has been a key consideration for the layout of the proposal and appropriate setbacks and heights around this building are applied.

The proposed development consists of 6 no. blocks which are mostly residential (apartment) units, although they also contain ancillary uses such as a creche, café and residential amenity facilities. The main development site area extends to 2.58ha with additional lands included for service connections and access proposals along Leopardstown Road and via Silverpines, which bring the overall site area to c. 2.74 ha. The site is generally located to the south of Leopardstown Park; to the east of residential development at Silverpines; and north of residential development known as 'The Chase'. Leopardstown Road runs adjacent to the site on the eastern site boundary.

The current scheme now submitted has been the subject of the statutory pre-planning consultation process with An Bord Pleanála (ABP) and Dun Laoghaire Rathdown County Council (DLRCC). The current proposal has had regard to matters arising from this process to ensure that the most appropriate form of development is delivered at this site.

As discussed in more detail in Chapter 3 Description of Development, the proposed development will consist of the demolition of 10 properties and associated structures and the construction of a new residential scheme of 463 no. apartment units, in 6 no. blocks (A-F) including ancillary uses. The proposed development consists of 6 no. residential / mixed use blocks (A-F).

In addition, proposals for vehicular access comprise 1 no. existing vehicular access point via Silver Pines (an existing all movement junction onto Brewery Road) and 1 no. new vehicular access point at the general location of 'Annaghkeen' at Leopardstown Road (a new Left in Left Out junction arrangement). The new access point along Leopardstown Road will replace existing access points at 'Woodleigh', 'Cloonagh', 'Souk El Raab', 'Welbrook', 'Calador', 'Alhambra', 'Dalwhinnie', 'Annaghkeen' and 'The Crossing'. New pedestrian and cyclist linkages are proposed through the site which provide permeability to Leopardstown Road and the adjoining Greenway. Proposals also provide for the relocation of an existing bus shelter along Leopardstown Road.

The associated site and infrastructural works include provision for water services; foul and surface water drainage and connections; attenuation proposals; permeable paving; all landscaping works including tree protection, tree removal and new tree planting; green roofs; boundary treatment; internal roads and footpaths; and electrical services.

4.3 Consideration of Alternatives

The alternative locations, layout and designs for this project and proposal are set out below.

Alternative Locations

Properties at St. Joseph's House, Madona House, Annaghkeen and Dalwhinnie House are owned by Homeland Silverpines Limited. All other properties are in third party ownership and the necessary letters of consent are enclosed with this application. In terms of site acquisition and ownership details, we can confirm the following details for the file:

Table 1 - Land Acquisition

Property	Owner	Acquired by Homeland Silverpines Limited/Homeland CHB Ltd
St Joseph's House	Homeland Silverpines Limited	05.02.2016 Property vacant since February 2021
Madona House	Homeland Silverpines Limited	
Annaghkeen	Homeland Silverpines Limited	19.03.2019
Dalwhinnie	Homeland Silverpines Limited	20.02.2019
Alhambra	Homeland CHB Ltd	17.09.2019
Souk El Raab	Homeland CHB Ltd	14/02/2021
Calador	Homeland CHB Ltd	17.09.2019
Cloonagh	Homeland CHB Ltd	09/12/2019
The Crossing	Homeland CHB Ltd	25.02.2020
Wellbrook	Homeland CHB Ltd	17.09.2019
Woodleigh	Homeland CHB Ltd	02/01/2020

The inclusion of lands represent a suitable site for development, being zoned for residential development under the Dun Laoghaire Rathdown County Development Plan 2016-2022, with 'residential' being permitted in principle under Objective A.

The applicant considered the following elements in selecting the site for development:

- The site offered significant opportunity to deliver significant residential development on an underutilised suburban infill site.
- The subject site has excellent connectivity to public transport and major areas of employment.
 - situated approximately 600m from the Sandyford Luas Stop and 700m from the Central Park green line Luas stops,

- QBC located along Leopardstown Road and also a number of bus services along Brewery Road. The closest bus stop on the N11 is approximately 16 minute walk away from the centre of the subject site, and is served by the 46A, 70, 75, 84X and 145 bus routes with services between the city centre at 10 minute intervals at peak periods.
- The site has capacity to absorb development without significantly effecting the existing landscape and visual characteristics of the surrounding area.
- The site is not susceptible to flooding
- The size of the main development site at 2.58ha offers a significant opportunity to deliver infill residential development along a key public transport corridor which supports the provisions of the National Planning Framework.

Having considered the above, the application site was considered the preferred site for the current residential proposal.

Alternative Layout & Designs

The design approach for the proposed development is presented in the Design Statement prepared by O'Mahony Pike Architects.

The subject proposal has evolved during the design phase of the project in response to input from the appointed EIAR team; following the statutory pre-planning stage of the process with Dun Laoghaire Rathdown County Council; following the statutory pre-planning discussions with An Bord Pleanála; and the formal opinion that issued from An Bord Pleanála under Ref. ABP-307355-20.

This process highlighted matters that informed the consideration of alternative layouts and designs including set back distances, open space provision, permeability and connections, height of the proposed blocks etc.

The evolution of the design and various layouts and design considered are summarised below.

Option A

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

- Requirement to provide 10% open space on the lands in accordance with the zoning objective.
- Retention of mature tree Planning objective on the site 'To protect and preserve Trees and Woodlands'.
- Definition of the public open space informed by the existing trees on site and the aim to create permeability through the site to the green way beyond.
- An assembly of apartment buildings of predominately 5 storeys in height at the centre of the development forming a communal courtyard. In addition, a 10 storey mid-rise block was provided to add legibility and act as a focal point upon arrival.
- Provision of a 3 storey housing element to the North Western edge interfacing with existing residential development and stepping down to 4 storey apartment blocks onto Leopardstown road.
- The existing historic building (St. Josephs) reinstated as object building in landscape.
- Access and Traffic strategy consisted of retention and re-use of the existing entrance off Silver pines with a new access off Leopardstown Road.

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

1. The permeability through the site was lacking, with arrangement of Blocks prohibiting integration of pedestrian and cycle movement and a hierarchy of landscape open spaces through the development.
2. The sense of arrival and place making at the centre of the scheme was weak.
3. The configuration also lacked legibility and was not creating any meaningful street frontage onto Leopardstown Road.
4. The apartment blocks would also give rise to concerns in relation to single aspect north facing units due to the block configuration and orientation resulting in sub-standard living.
5. The proposed block arrangement also lead to the public open space being quiet fragmented.

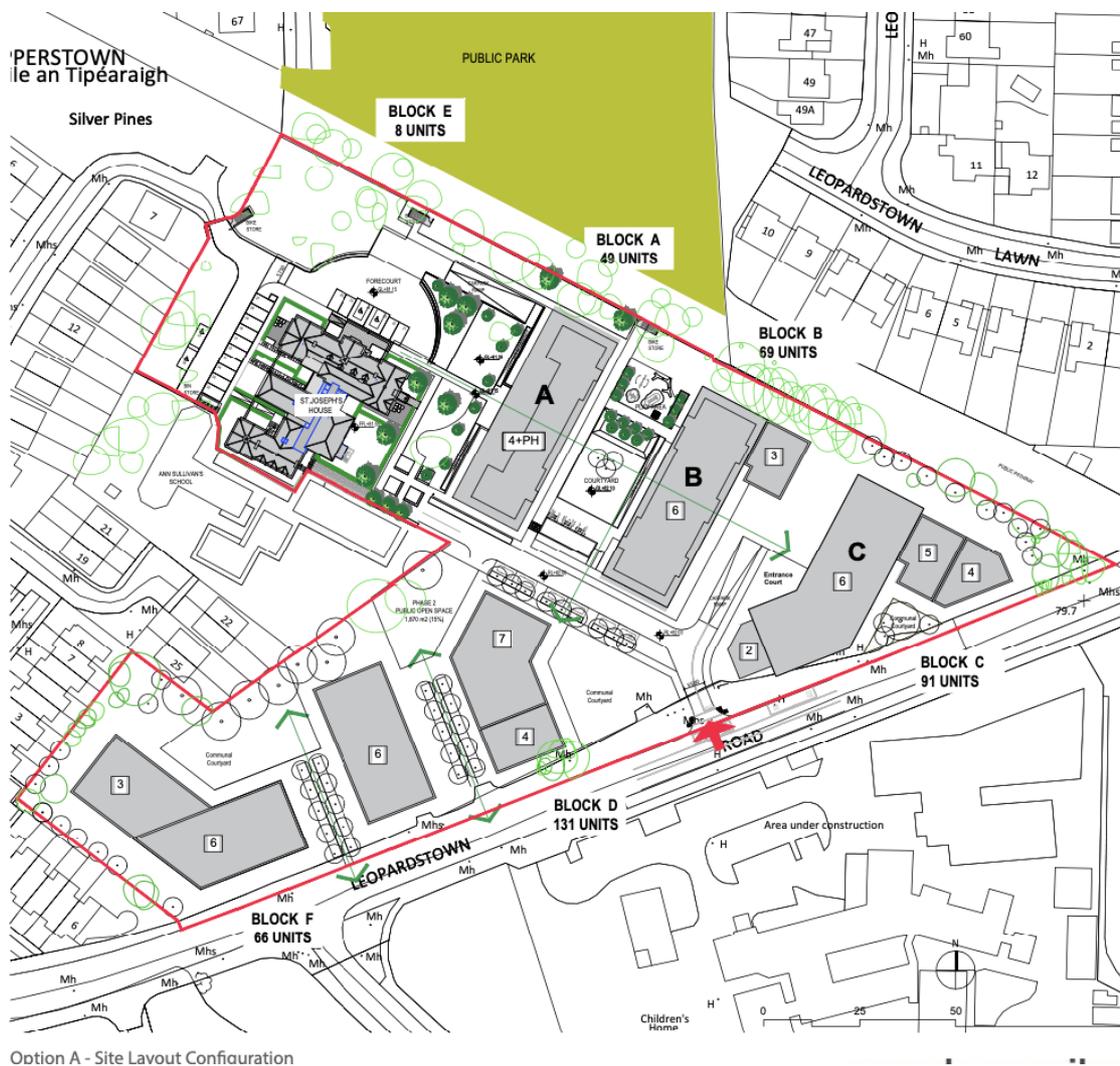


Figure 4-1 Option A - Site Layout

Option B

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

- Rearranged Blocks D & F to consolidate the Open Space, allowing a more generous offering.
- Stronger masterplan with Block D echoing the form of Block C along Leopardstown road, creating more meaningful streetscape.
- The sense of arrival was strengthened with Block D creating a street leading & providing views to St. Joseph's house on entry from Leopardstown Road.
- The Key first principle was to provide a stronger focus on the access connecting Leopardstown road with the forecourt space to the front of St Joseph's house and the greenway to the North. This access is annotated by the red arrow in the diagram.

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

1. The permeability through the site was still not easily visible from Leopardstown Road, this connection could be strengthened.
2. Road to third parking ramp at Block F was creating a barrier to pedestrian permeability through the open space.
3. The extent of Blocks D & F fronting onto Leopardstown road offered little relief from the west.
4. The proposed block arrangement also lead to the Public Open Space being to the north and very contained behind the buildings.

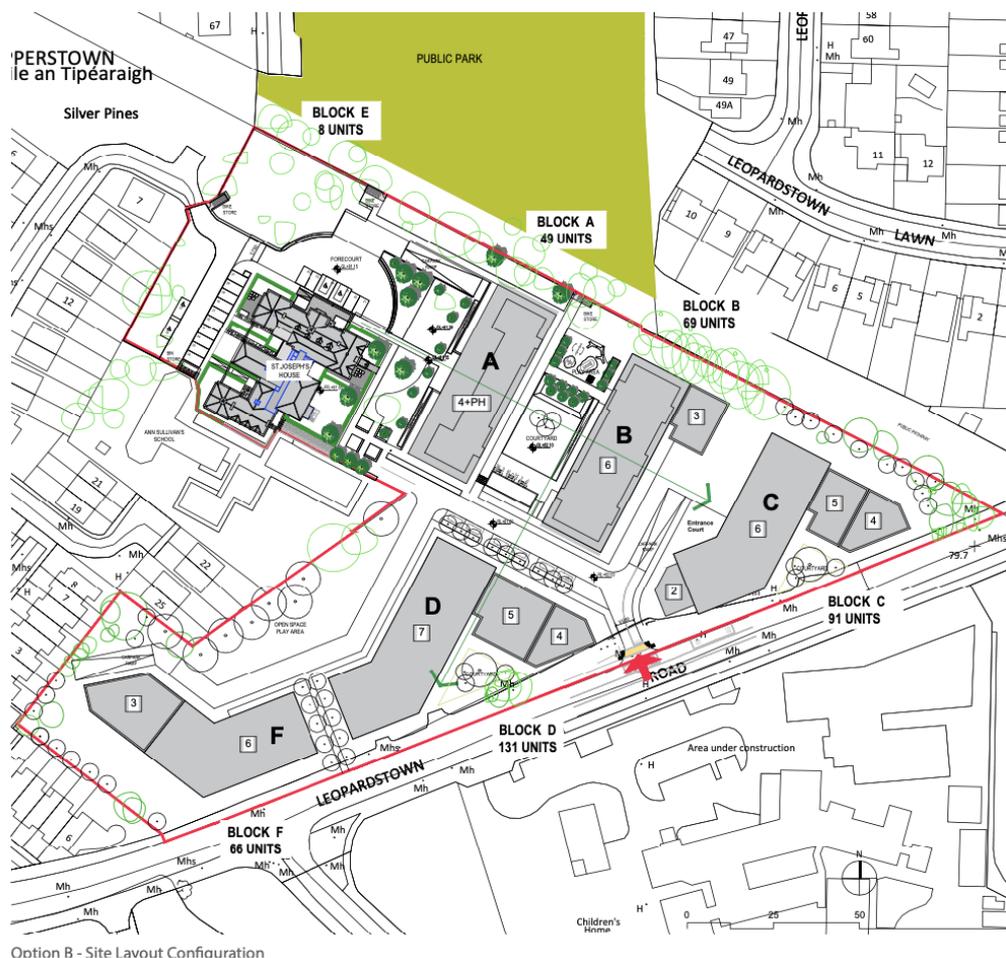


Figure 4-2 Option B Site Layout

Option C

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

- Realignment of Blocks D & F to guide the route through the site forming a better connection from Leopardstown road through the Open space & public route through to the Greenway beyond.
- Scaling down of the rear wing of Block F to address the neighbouring properties.
- More considered articulation and massing of the apartment blocks forming the edge to the Leopardstown Road, giving more variety to the street frontage.
- Creating a sense of arrival from new access off Leopardstown road with widened tree lined avenue terminating at a small plaza on axis with views to St. Josephs house.
- Repeated tree groves created in front of the three blocks fronting onto Leopardstown road enhancing the streetscape and allowing for retention of existing trees in addition to planting new trees to strengthen the landscape edge to the public realm

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 Sandyford road entrance and increased separation distances to residential properties Silver Pines.
3. Further consideration of the public park edge to the rear of the site behind Blocks D & F.



Figure 4-3 Option C - Site Layout

Option D

Alternative Option D became the base line masterplan and consisted of the following key elements and strategy:

- Reconfigured Block F to further highlight the link route through the site with higher corner onto Leopardstown road to address the junction with Tudor lawns.
- Further articulation of block D to ensure legibility of the scheme and creates an anchor to the small plaza and addresses the communal courtyard between Blocks A & B.
- The public open space and woodland walk along the North edge provide pedestrian and cycle pathway connecting a variety of landscape character spaces and acting as a walking and exercise trail.
- St. Josephs house was retained to form a 'set piece' at the entrance off Silver pines. A new access from Leopardstown road provides focused views to St. Josephs house giving a sense of formality upon arrival. This composition ensures that St. Josephs House becomes the focal point and form the strong backdrop to the end of the tree lined avenue as you arrive from the new access road.
- Opportunities were sought to try and ensure that this highly accessible site is suitably dense and the land resource is best served regarding future proofing for a sustainable development. As such, apartment numbers increased from circa 410 to 490 units including the proposed conversion and re-use of St. Josephs house for residential living.

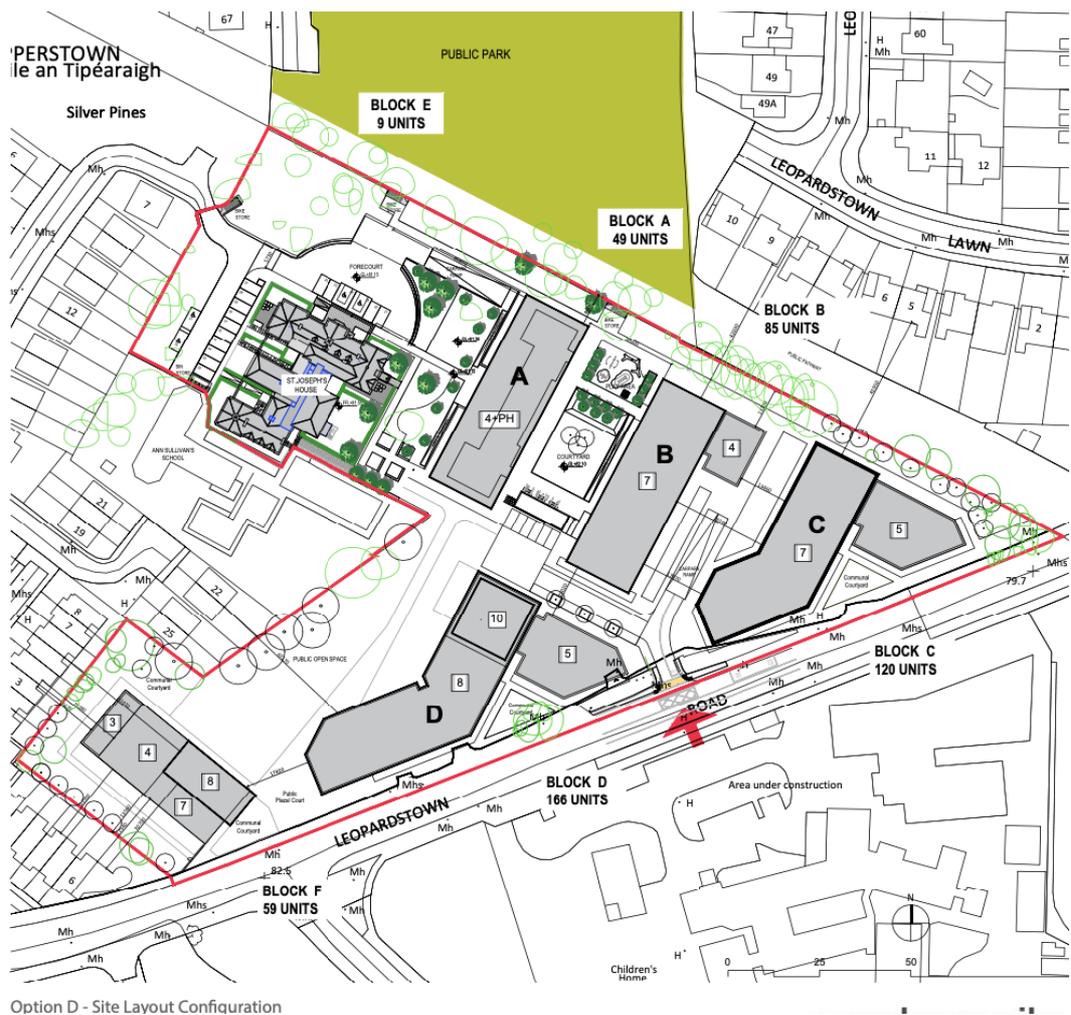


Figure 4-4 Option D - Site Layout

Option E - Final Masterplan

Following the ABP Tripartite stage meeting, further minor enhancements to the masterplan were incorporated in response to ABP and DLRCC opinion as follows:

- The 8 storey 'visual marker' at the corner of Block F is reduced in height to 6 storeys so as to reduce its visual impact. The height is in line with scaling down to the edges of the site and sits comfortably onto Leopardstown road.
- Block F secondary courtyard element was reconfigured to scale down more sensitively to the surrounding properties providing 3 storey band to this edge of the site.
- Further refinement of Block B secondary element to provide better separation between opposing facades and in doing so added to the communal open space between these blocks.
- Further enhancement of dual aspect provision to provide in excess of 50% ratio resulted in adjustments to the layouts. These changes improved the overall residential quality.
- Set back added to PH level of Block D and separation of this PH level from the 10 storey element providing additional Dual aspect units and also private terraces to those units in addition to lightening the overall massing of the Block from street level views.



Figure 4-5 Option E-Final Frozen Masterplan

4.4 “Do Nothing” Alternative

As highlighted above, the site is zoned for residential development under the Dun Laoghaire Rathdown County Development Plan 2016-2022, and the principle of residential development at this site fully complies with the relevant Development Plan zoning governing the site. The ‘Do Nothing’ Alternative associated with this particular site involves the site remaining in the current condition that being with a permitted permission for part of the site D17A/0337 & PLo6D.249248 would likely be implemented.

The 7 no. large, detached houses on large plots fronting Leopardstown Road (i.e. the part of the site added subsequent to the granting of the above permission) would remain in use as individual dwellings. This would not fully realise the potential of the subject site for sustainable residential use in line with the current national policy mandate.”

This is a completely inefficient use of lands proximate to key public transport nodes and significant employment areas. Furthermore, the opportunity to complete and enhance the residential development to deliver on the visions and objectives of ‘Rebuilding Ireland - An Action Plan for Housing and Homelessness’, which is considered a key planning gain would be lost.

4.5 Conclusion

The proposed layout was carefully developed, taking into consideration the existing neighboring properties, the conditions along Leopardstown Road, as well as local environmental conditions such as orientation, wind, noise and overshadowing.

The scheme aims to maximize the efficiency and quality of the proposed apartments blocks while minimizing the impact on existing properties, improve the landscaping of the main Leopardstown Road and provide a coherent, pleasant and fully accessible permeable public realm.