

4.0 CONSIDERATION OF ALTERNATIVES

This Chapter details the reasonable alternatives considered for the proposed project and reasons for the chosen option.

4.1 Description of the Reasonable Alternatives

Effect avoidance is principally achieved by consideration of alternatives¹. The approach to identifying alternatives is project specific.

Schedule 6 (1) (d) of the Planning and Development Regulations (2001) was amended following the transposition of Directive 2014/52/EU and requires an Environmental Impact Assessment Report to include:

“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 in indication of the main reasons for the option chosen, taking into account the effects of the proposed development on the environment”.

By way of explanation or amplification of the above information, Schedule 6 (2) (b) states;

“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”.

EU Guidelines² summarises the consideration of alternatives as follow-

“Alternatives are essentially different ways in which the Developer can feasibly meet the Project’s objectives, by carrying out a different type of action, choosing an alternative location or adopting a different technology or design for the Project for example.”

Alternatives must be ‘reasonable’, meaning feasible options that meet the Project’s objectives. As noted by the EPA Guidelines³, analysis of high level or sectoral strategic alternatives e.g. electricity generation from renewables rather than fossil fuels, is not expected within a project level EIAR. The alternatives must also be relevant to the project and its specific characteristics.

¹ Para. 2.4.1 Guidelines on the information to be contained in Environmental Impact Assessment Reports — EPA, 2022

² Environmental Impact Assessment of Projects Guidance on Scoping (EU, 2017)

³ EPA 2022

4.1.1 Alternative Locations

As noted by the EPA Guidelines, some alternatives will not be applicable. There may be no relevant 'alternative location' but there may be alternative design options for example.

The applicant is the owner of the development area and the application site. It is submitted it would be unreasonable to consider alternative sites outside the applicant's ownership that could not realistically be brought forward. It is also noted that there is only one other area zoned for the creation of new residential communities within the Templeogue/Walkinstown/Rathfarnham/Firhouse neighbourhood as identified by the South Dublin County Development Plan 2022-2028. This area is under construction and was granted planning permission for a large scale residential development (P.A. Ref. LRD24A/0007, ABP- 321419-24).

The Guidelines point out that higher level alternatives may already have been addressed during the strategic environmental assessment of relevant strategies or plans. The subject development area has been zoned to provide for new residential communities by the South Dublin County Development Plan 2022-2028 which was subject to a Strategic Environmental Assessment under the SEA Directive 2001/42/EC and is accompanied by a Natura Impact Report as per Directive 92/43/EEC and a Strategic Flood Risk Assessment which has regard to both the Water Framework and Floods Directives. The proposed development is fully in keeping with the zoning objective and policies of the South Dublin County Development Plan 2022-2028 as detailed in the Statement of Consistency prepared by Stephen Ward Town Planning and Development Consultants Ltd under separate cover.

The proposed development would be located on appropriately zoned lands within an urban area and would be in keeping with the pattern of development and recently permitted residential developments.

The application site is greenfield with the eastern portion currently used to graze horses. Habitats identified are mostly of low ecological value. The site is surrounded on three sides by established residential development. The site directly north has been identified for the provision of a primary school. While the project will result in a change to the existing land use, it will not result in the significant or material loss of productive agricultural lands and represents an efficient use of land within the Dublin Metropolitan Area where housing is in demand.

4.1.2 Alternative Uses

The development area (c.10.38ha) is zoned with the objective "*To provide for new residential communities in accordance with approved area plans*". Residential and childcare facilities are permitted in principle on land with this zoning objective as outlined by Table 12.3 as follows-

Childcare Facilities, Community Centre, Cultural Use, Doctor / Dentist, Education, Enterprise Centre, Funeral Home, Garden Centre, Guest House, Health Centre, Housing for Older People, Industry-Light, Nursing Home, Offices less than 100 sq m, Open Space, Primary Health Care Centre, Public House, Public Services, Recreational Facility, Recycling Facility, Residential Institution, Residential, Restaurant / Café, Retirement Home, Shop-Local, Shop-Neighbourhood, Sports Club / Facility, Stadium, Traveller Accommodation, Veterinary Surgery

Land Use Classes open for consideration are;

Advertisements and Advertising Structures, Agriculture, Allotments, Bed & Breakfast, Betting Office, Camp Site, Car Park, Caravan Park-Residential, Cemetery, Crematorium, Embassy, Fuel Depot, Home Based Economic Activities, Hotel / Hostel, Industry-General, Live-Work Units, Motor Sales, Nightclub, Office-Based Industry, Offices 100 sq m-1,000 sq m, Off-Licence, Petrol Station, Place of Worship, Refuse Transfer Station, Science and Technology Based Enterprise, Social Club, Wholesale Outlet, Work-Live Units

In accordance with Table 12.3 of the SDCDP, these lands are not suitable for the following lands uses;

Abattoir, Aerodrome / Airfield, Boarding Kennels, Concrete / Asphalt Plant in or adjacent to a Quarry, Conference Centre, Data Centre, Heavy Vehicle Park, Hospital, Industry-Extractive, Industry-Special, Offices over 1,000 sq m, Outdoor Entertainment Park, Refuse Landfill / Tip, Retail Warehouse, Rural Industry-Food, Scrap Yard, Service Garage, Shop-Major Sales Outlet, Transport Depot, Warehousing, Wind Farm

It is submitted that residential is the most suitable land use for the application site due to its steep and varied topography and its existing development context. The development site would be unsuitable for buildings with a large floorplate such as large retail outlets, industrial use or office buildings. The residential built form as proposed is able to work with the site to reduce the level of cut required and minimise retaining structures. The site is surrounded on three sides by existing residential development and there is a development plan objective to provide a school to the north. These are sensitive users. Residential development will reduce potential environmental effects on sensitive receptors as it is of the same character of land use.

4.1.3 Size and scale

The applicant is the owner of the development area extending to 10.35hectares. It is a self-contained site and the proposed development will merge with the established residential development west, north and east of the site with a clear divide between urban and rural lands beyond to the south. In order to provide a comprehensive development the entire landholding forms part of the subject planning application. Developing the site in a piecemeal manner would have a negative impact on the visual amenity of future residents and restrict opportunities for place making and establishing an identity for this new neighbourhood.

In accordance with development plan policy and the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities issued under Section 28 of the Planning and Development Act 2000 (as amended), the recommended residential density for the subject site is in the range of 40-80 dwellings per hectare. Using a broad brush assessment based on the recommended residential density range, in a 'do minimum' scenario, the 10.38ha site could provide 414no. dwellings. Applying the maximum density as a 'do maximum' scenario would result in the site containing 828no. dwellings. The proposed development provides 502no. dwellings in a medium density, low rise format. It is submitted that the density proposed is appropriate given the site characteristics and constraints while maintaining efficiency in line with national guidelines.

In order to provide the maximum density on site, smaller unit types and taller buildings would be required in the form of apartment blocks. This would likely result in negative effects on the visual amenity of the area. Taller buildings would require more intensive grounds works including basements for car parking and potential piling with further environmental impacts.

4.1.4 Alternative Design and Layout

Planning History

A Strategic Housing Development consisting of 329no. residential units (140no. houses and 189no. apartments), childcare facility and associated site works was granted by An Bord Pleanála under P.A.Ref. ABP-310578-21. This project was subject to Environmental Impact Assessment. The decision of An Bord Pleanála to grant planning permission was subsequently Quashed by the High Court.



Figure 4.1 Previously permitted Strategic Housing Development

A fundamental policy change has occurred since the SHD shown above was granted in 2021. The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities issued in 2024 under Section 28 of the Planning and Development Act 2000 (as amended), encourage the development of medium density low rise developments that allow for increased density to be achieved with own door units.

In addition, the Ballycullen-Oldcourt Local Area Plan (2014) that was in place at the time of the previous SHD proposal expired in September 2024 and new County Development Plan came into effect in 2022.

The design and layout has also been informed by pre-planning consultations held with the planning authority South Dublin County Council. As a large scale residential development (LRD) the applicant engaged with the planning authority as required under S.247 and Section 32 of the Planning and Development Act 2000 (as amended). The sections below outline the alternative designs and layouts considered pre-planning.

S.247 Pre-Planning Consultation (No.1)

The layout illustrated by figure 3.6 was progressed in advance of a Section 247 meeting with South Dublin County Council held on the 19th of July 2024. The proposal included;

- 526no. residential units and a crèche.
- Density 50.5dph
- A mix of houses (240no.) and apartments (255no.)
- 16.8% public open space
- Building heights proposed between 2 and 4 storeys

Dwelling types included apartments, duplex apartments and houses in a mix of 1-bedroom to 4-bedroom formats. The design focused on creating a perimeter of housing with taller apartment buildings in the centre of the eastern section of the site. Vehicular access to be provided from the existing spur road connecting to Stocking Avenue to the west of the site and via Stocking Wood Drive to the east of the site.



Figure 4.2 No. 1 S.247 Pre-planning Consultation with South Dublin County Council

The design team reflected on the feedback from South Dublin County Council at the meeting and minutes issued on the 23rd of July 2024 to address the following concerns relating to design and layout-

- Concern was expressed in relation to the four storey height and potential visual impact given the slope on the eastern section of the site. It was suggested that the height be reduced to three storey and/or increased height relocated to the lower levels of the site.
- The length of the blocks increase their visual impact. It was suggested that the length of the blocks be reduced.
- Density across the site should take account of the site constraints and level changes.
- Consider the proximity and amenity of existing residential development adjoining the site.
- Be mindful of school site to the north.

- Potential impact of retaining walls on the amount of light getting to duplex units was raised as a potential issue. It was recommended that a Daylight and Sunlight Analysis be undertaken.
- Ensure the creche has adequate open space, drop off space and potential to expand while protecting residential amenity.
- Public open spaces should be usable and typologies confirmed.
- A minimum of two vehicular access points are required.
- Gradients should be carefully considered with regard to Universal Design.
- Reduce car parking if possible.
- Retain as many original site features as possible; streams, ditches and hedgerows.
- Consider transitional space to the south rather than a hard urban hedge.
- Nature based SUDS can be included in public open space but underground tanks cannot be included in calculation of public open space provision.
- The new road crossing should be informed by an arboricultural report. Take the least sensitive route through this area.
- 10m set back required from the stream in the centre of the site.

Further investigations into the existing and proposed site levels was an important advancement in the design and layout of the proposed development prior to the second S.247 Consultation. Daylight and sunlight analysis informed the design of the central duplex blocks as well as investigating potential overshadowing from retaining walls across the site on private open space and access to daylight.

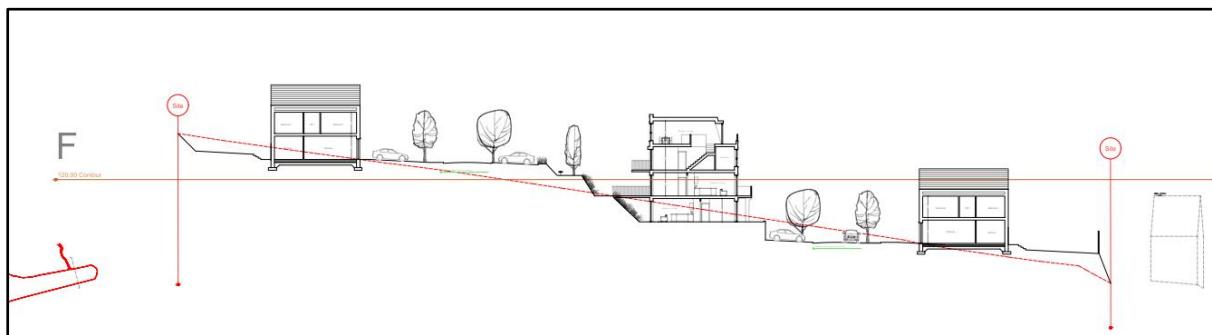


Figure 4.3 Development if site cross sections

S.247 Pre-Planning Consultation (No.2)

The proposal set out for the second pre-planning consultation with South Dublin County Council is illustrated by figure 3.7 The proposed development consisted of;

- 469no. residential units and creche.
- Density of 40.5dph
- A mix of houses (240no.) and apartments (255no.)
- 16.4% public open space.
- Building heights proposed between 2 and 4 storeys

This revised design made the following changes from the previous proposal presented on the 19th of July 2024-

- The existing hedgerow on the north west of the site and south of the future school site was retained within an area of public open space.
- An apartment block was placed to the east of the creche to create a more effective sense of arrival from the existing spur road to Stocking Lane.
- Garden lengths were increased along the western boundary and the two pedestrian/cycle links reinforced through the revised design.
- The layout of the north east of the site focussed on creating a perimeter block with existing development to the north (Stocking Wood), opening up views into the site and potential linages to Stocking Wood.
- The east west access road created a loop within the eastern portion of the site where there was previously a cul-de-sac for better circulation and servicing.
- Apartment blocks were shortened and varied in their building line to the east of the site.
- The housing blocks to the south east of the site were alternated to allow the taller duplex blocks to sit back further into the site increasing the separation from Stocking Wood.



Figure 4.4 No. 1 S.247 Pre-planning Consultation with South Dublin County Council

Following the meeting held with South Dublin County Council on the 26th of September 2024 and Minutes issued on the 1st of October 2024, the design was revised to take account of concerns of the Local Authority relating to-

- Potential visual impact of four storey apartment buildings on the viewpoints from Stocking Wood Estate.
- Consider relocating four storey height elsewhere on less elevated sections of the site.
- Gardens along the western boundary appear constrained. A schedule of garden areas is required to demonstrate conformity with the Sustainable Residential Development and Compact Settlement Guidelines.
- Softening of southern boundary and space required to maintain hedgerows.
- Usability of public open space needs to be demonstrated with details of levels and cross sections.
- Lack of a level kick about space raised.

Further design adjustments and levels workshops were undertaken following consultation with South Dublin County Council. The Design Team considered removing the pedestrian linkages to the west due to level differences. The creche was repositioned due to further assessment of surface drainage requirements for the site. The main change following discussion at the second S.247 meeting was the omission of the eastern loop road which joined the east-west roads on the lower and upper levels of the east side of the site. Instead this was made a pedestrian/cycle link allowing for a more meaningful relationship between the existing hedgerow and public open space within the Stocking Wood and White Pines developments. The Design Team sought to achieve nature based engineering solutions across the site while constrained with a steep topography and limited opportunity for infiltration due to existing soil conditions.



Figure 4.5 Scheme Development

LRD Meeting: The layout submitted for consideration at the LRD Meeting is illustrated by the Figure below. The proposed development consisted of;

- 495no. dwellings and a crèche
- A density of 47.8 dwellings per hectare.
- A mix of houses (240no.) and apartments (255no.)
- 16.5% public open space.
- Building heights ranging from 2-4 storeys.



Figure 4.6 LRD Meeting Scheme Proposed

This design was accompanied by verified photomontages to aid assessment of visual impacts on Stocking Wood in recognition of the planning authority's concerns at the previous pre-planning meetings.



Figure 4.7 Photomontage prepared for LRD Meeting Stage

LRD Opinion: Following the LRD meeting held on the 16th of January and LRD Opinion issued by South Dublin County Council in February 2025, the site layout and design was amended (please see Response to Opinion by Stephen Ward Town Planning and Development Consultants Ltd under separate cover for full detail).

Final Layout: Alternative designs were continually reviewed throughout the process including the results of later reports undertaken the findings of this EIAR.

In conclusion, the design of the final site layout as attached at Appendix 1.2 is the product of a long and considered process from baseline studies, consultation with South Dublin County Council and is in line with the South Dublin County Development Plan and all relevant Section 28 Government Guidelines. The proposed development the subject of the LRD planning application consists of;

- 502 no. dwellings and a crèche
- A density of 48.4 dwellings per hectare.
- A mix of houses (197no.) and apartments (305no.)
- 22.1% public open space.
- Building heights ranging from 2-4 storeys.

4.2 Main Reasons for Chosen Option

The EIA Directive requires that Developers provide the main reasons for selecting the option chosen taking into account the effects of the project on the environment.

The established strategies for mitigation of effects are avoidance, prevention and reduction. Effects avoidance is most applicable at the earliest stages, while prevention or reduction may be provided up to a much later stage⁴. The proposed development sought to avoid environmental effects early in the design process by avoiding areas that are environmental sensitive and including preventative measures to stop or reduce potential adverse effects from occurring.

Baseline Studies and Environmental Constraints

Baseline studies were undertaken in the areas of archaeology and ecology to inform the design and layout of the proposed development together with a tree survey, topographical survey and site investigations. Topographical survey of the site, review of map resources and site visits identified sensitive receptors in the established residential developments surrounding the site.

The baseline assessments provided strategic information that allowed potential environmental effects to be taken into account when development the site layout proposed. From the beginning of the project design it was recognised that the central woodland and stream were both a key strength of the site in terms of its green infrastructure but also a sensitive environment to be protected. A 10-metre buffer zone from the banks of the stream was put in place to ensure that no buildings works were proposed within this zone. An examination of the woodland through site visits by the Design Team informed by a tree survey identified the best place to bring the road across to join the east and west sections of the site. The mammal survey provided design considerations

⁴ EPA 2022, Guidelines on the Information to be contained in Environmental Impact Assessment Reports

in relation to the future road design to allow passage beneath the road. An appropriate assessment screening undertaken by Whitehall confirmed the presence of two hydrological links to the Natura network and a Natura Impact Statement was prepared early in the project to ensure appropriate mitigation measures were established and informed the construction management plan.

It is submitted that the examination of alternative outlined above demonstrates the chosen option is the most appropriate for the following reasons-

- **Land uses proposed**

The proposed land uses are fully in keeping with the lands use zoning objective applied by the South Dublin County Council Development Plan which has been subject to Strategic Environmental Assessment.

- **The size and scale**

The size and scale of the residential neighbourhood proposed is in keeping with the existing pattern of development in the area and makes efficient use of a zoned and serviced site in an urban area in keeping with national and regional planning policy.

- **The design and layout**

The design and layout takes full account of environmental sensitivities on site and enhances existing green infrastructure.

It is considered that all reasonable alternatives have been considered and there are no alternatives which would significantly reduce or further minimise environmental impacts,

The 'Do-nothing' Scenario

The 'do nothing' scenario or 'no Project' alternative describes what would happen should the Project not be implemented at all⁵. In the do-nothing scenario, no proposed development of 502 residential units and childcare facility would not take place. It is submitted that there is identified need for the proposed project and as such the 'do-nothing' scenario would not be desirable. The application site is zoned and serviceable with existing residential development adjoining the site to the west, north and east. The proposal is in keeping with National, Regional and Local Planning Policy. In the 'do-nothing' scenario, the only potential environmental impact would be as a result of human activity from walkers using the fields or horses grazing. It is considered that any potential impact would be neutral and imperceptible.

⁵ EU, 2017

References

- Guidelines on the Information to be Contained in EIAR (EPA, 2022)
- Planning and Development Regulations 2001 (as amended)