

### **3 DESCRIPTION OF PROPOSED DEVELOPMENT**

#### **3.1 Introduction**

This Chapter of the EIAR provides a Description of the Proposed Development which will be assessed as part of the EIA process.

The Description of Development provides details of this project which requires planning consent. It includes a description of the location of the project and its physical and environmental characteristics. The Chapter also provides details of earlier sub-threshold developments in the wider landbank at Portmarnock South. Some of these are built and occupied, some and under construction at present. In addition, there are residual lands that have yet to be the subject of any application but which are identified as having capacity for residential development. As these form part of the wider land holding now controlled by the Applicant it is prudent to also have regard to these as part of the cumulative impact of the development. The description of development as set out in this Chapter is also set out in the following chapters prepared by consultants specialising in the environmental topics subject of the Chapters.

In line with the EIA Directive a description of the application site, design, size and scale of development are also discussed within this Chapter. Consideration is also given to all relevant phases of development from construction through to operation. This chapter provides a broader summary description of the Proposed Development that is subject of this EIAR. The environmental impacts of the Proposed Development are then examined for each of the prescribed environmental topics discussed in turn under Chapters 5 – 17. A summary of the proposed mitigation measures are set out in Chapter 18: Summary of Mitigation Measures. The residual impacts of the Proposed Development are summarised under Chapter 20: Summary of Residual Impacts.

This chapter has been prepared by Stephen Little, Managing Director and Michael O’Sullivan, Senior Planner, of Stephen Little & Associates. Stephen has 29 years’ professional experience of town planning in Ireland, is a Corporate Member of both the Irish Planning Institute and the Royal Town Planning Institute and holds a Diploma in EIA Management (UCD). Michael has 8 years’ professional experience in the planning in both the public sector and private consultancy in Ireland, has a MPlan – Masters in Planning & Sustainable Development and is a Corporate Member of the Irish Planning Institute.

#### **3.2 Site Context & Location**

The subject site (‘the Site’) represents the next phase of a plan-led phased development in this part of Portmarnock. It is located in an area identified for development under the Portmarnock South Local Area Plan, 2013 (as extended) (LAP). The site is located in the townlands of Portmarnock and Maynetown, Portmarnock, Co. Dublin. The LAP lands are generally bounded by Station road to the north, Coast Road and the Baldoyle Road to the east, Moyne Road to the south and the Dublin – Belfast Train Line to the west.

The subject site consists of 1no. site. The gross area of the application site in this case is approximately 11.05 Ha. The extent of the subject site for the 172no. proposed housing units is generally bounded by the existing ‘St. Marnock’s Bay’ and ‘Dún Sí residential development’s (Phase 1A & Phase 1B – respectively) and permitted Phase 1C (ABP-305619-19 refers) to the north, the Dublin – Belfast train line to the west and former agricultural lands to the east and south within the townlands of Drumnigh, Maynetown and Portmarnock, Portmarnock, Co. Dublin.



**Figure 3.1:** Extract from Google Earth showing the Site outlined in red (Overlay by SLA). Please refer to the Site Location Map and Site Layout Plan, prepared by Burke Kennedy Doyle Architects for further detail.

### 3.3 Existing & Planned Uses

The subject site adjoins Phase 1A (completed) and Phase 1C (under construction) of the development known as 'St. Marnock's Bay'. The Proposed Development will constitute Phase 1D of St. Marnock's Bay.

The majority of the subject site consists of greenfield lands most recently in use as agricultural lands.

The existing Marketing Suite permitted under FCC Reg. Ref. F20A/0604 will continue to be used to market the Proposed Development (located to the east of the townland boundary adjacent Phase 1B).

The subject site is to be developed to provide 172no. residential units and a major public park, connected to the St. Marnocks Bay (Phase 1) and 'Dun Si' (Phase 1B) and the permitted Phase 1C development by existing and proposed roads.

Part of the site located between Moyne Road and the development lands comprises lands identified as open space catering for the Portmarnock South lands and the wider community, as well as having an objective for a road. The development proposed therefore also comprises a roadway linking Moyne Road with the zoned lands at Portmarnock South.

These proposals accord with the uses and nature of physical development envisioned at these locations in the LAP.

### 3.4 General Description of Proposed Development

The Proposed Development subject of this SHD Planning Application will generally comprise: -

- 172no. units (22no. duplex / apartments and 150no. houses), ranging between 1.5 and 3 storeys in height comprising the following: -
  - 11no. 3-bed 1.5 storey houses (House Type: G).
  - 83no. 3-bed 2 storey houses (House Type: A1, A2, A3, A4, A5, A6, B1, B2, B3, C1, C2 & C3).
  - 5no. 4-bed 1.5 storey houses (House Type: H).
  - 51no. 4-bed 2 storey houses (House Type: D1, D2, F1, F2, F3, F4 & F5).
  - 11no. 2-bed duplex / apartments (House Type: J1, J2 & J3).
  - 11no. 3-bed duplex / apartments (House Type: K1, K2 & K3).
- Private rear gardens are provided for all houses. Private patios / terraces and balconies are provided for all duplex / apartments.
- Vehicular access to serve the development will be provided from Station Road via 2no. existing roads serving St. Marnock's Bay ('The Drive' and 'Monument View'), 2no. permitted roads serving St. Marnock's Bay ('Finches Gate' and 'Skylark Park View') permitted under ABP Ref. ABP-305619-19 (currently under construction) and a proposed new permanent road to connect with Moyne Road (to the south).
- The new permanent road includes a primary length of road extending eastwards from the eastern edge of 'Dún Sí at St. Marnock's Bay' residential development turning south to connect with Moyne Road totals c. 891m in length and 6.5m wide, an additional east-west spur of c. 249m in length and 6m wide extends from the eastern edge of the proposed residential development which connects with the primary length of road running north-south to Moyne Road, a new permanent junction at Moyne Road and associated pedestrian crossings, footpaths, public lighting, surfacewater infrastructure, landscaping and boundary treatment.
- Upgrade of the existing temporary foul water pumping station and storage tank located to the northeast of 'Dún Sí' (Phase 1B) residential development to increase capacity and all associated ancillary works. This aspect of the development comprises amendments to site development works permitted under ABP Ref. ABP-300514-17 which amounts to c. 0.32 Ha of the overall site area.
- Areas of public open space including the provision of 'Skylark Park' (c. 8,150 sq. m), extension of 'Railway Linear Park' (c. 6,990 sq. m) and townland boundary Linear Parks.
- 345no. car parking spaces.
- 30no. bicycle parking spaces.
- Bin stores.
- 3no. ESB Sub-stations.
- All associated and ancillary site development, infrastructural, landscaping and boundary treatment works. All on a site of c. 11.05 Ha.

### 3.5 Statutory Planning Context

The subject lands are subject to national, regional, sub-regional, county and local planning policy. The following outlines high level planning policy of relevance to the future development of the subject lands. Whilst the EPA's Draft Guidelines suggest that assessment of planning policy should not form part of an EIAR, it is considered that the planning context itself is an important aspect to understanding the development being proposed and that it is appropriate to refer to same in that context. This section will not address the detailed policies and objectives contained in the various plans which are relevant to the proposed SHD at Portmarnock South, as these are addressed in a separately in the Planning Report & Statements of Consistency, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants which accompanies the Planning Application.

#### 3.5.1 National Planning Framework – Ireland 2040

The NPF sees 40% of all new homes nationally being located within the existing built up area of existing settlements.

The NPF marks a shift away from allowing urban sprawl, to more brownfield and infill urban development, focussed on integrated investment in and use of quality public transport focussed development and other essential services, to deliver a denser and sustainably compact urban form.

This means encouraging more people, jobs and activity generally within our existing urban areas. In particular, it requires well-designed, high quality development that can encourage more people, and generate more jobs and activity within existing cities, towns and villages.

This requires that development meets appropriate design standards to achieve targeted levels of growth. It also requires active management of land and sites in urban areas.

The NPF also sets out a number of National Policy Objectives (NPO) that seek to ensure that the over-riding intent of the NPF is delivered. In the context of this proposal, it is considered that the following particular NPOs are worthy of mention: -

**National Policy Objective 3a**

*“Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.”*

**National Policy Objective 4**

*“Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.”*

**National Policy Objective 6**

*“Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.”*

**National Policy Objective 9**

*“There is potential in each Regional Assembly Area for significant growth in some settlements (i.e. 30% or more above 2016 population levels). Subject to criteria including the provision of adequate infrastructure and amenities to support such growth, and concurrent employment provision.”*

**National Policy Objective 11**

*“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.”*

**National Policy Objective 27**

*Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages’.*

**National Policy Objective 33**

*“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”*

**National Policy Objective 35**

*“To increase residential density in settlements, through a range of measures including restrictions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights”.*

Objective 72a requires Planning Authorities to apply a standardised tiered approach to zoning of land and Appendix 3 of the NPF ‘A Methodology for a Tiered Approach to Land Zoning’ sets out a two-tier approach to land use zoning. The following is set out in relation to Tier 1: Serviced Zoned Land: -

**“Tier 1: Serviced Zoned Land**

*This zoning comprises lands that are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development.*

*These lands will generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands. The location and geographical extent of such lands shall be determined by the planning authority at a settlement scale as an integral part of the plan-making process and shall include assessment of available development services.*

*Inclusion in Tier 1 will generally require the lands to be within the footprint of or spatially sequential within the identified settlement.”*

The Proposed Development constitutes an efficient and sustainable use of lands in delivering a new plan-led residential neighbourhood on lands zoned for residential use as part of the Fingal County Development Plan 2017 – 2023 and Portmarnock South Local Area Plan (2013 – As Extended).

**3.5.2 Eastern and Midlands Regional Spatial & Economic Strategy**

The Regional Spatial and Economic Strategy (RSES) for the East and Midlands provides regional level strategic planning policy for the eastern and midland region, and Dublin, in line with the NPF. The Region includes Dublin and its Metropolitan Area. The RSES contains the following elements: -

- Spatial Strategy – to manage future growth and ensure the creation of healthy and attractive places to live, work, study, visit and invest in.
- Economic Strategy – that builds on the region’s strengths to sustain a strong economy and support the creation of quality jobs that ensure a good living standard for all.
- Metropolitan Plan – to ensure a supply of strategic development areas for the sustainable growth and continued success and competitiveness of the Dublin metropolitan area.
- Investment Framework – to prioritise the delivery of key enabling infrastructure and services by government and state agencies.
- Climate Action Strategy – to accelerate climate action, ensure a clean and healthy environment and to promote sustainable transport and strategic green infrastructure.

The RSES concur with the Implementation Roadmap for the NPF in noting that *“...the scale of projected population targets for cities means some transfer of projected growth to their wider metropolitan areas is appropriate, particularly during the transition period to 2026...”*

The Guiding Principles (p.187) set out in the RSES in relation to the Integration of Land Use and Transport supports the ‘10 minute’ settlement concept, whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or accessible by high quality public transport to these services in larger settlements.

The Proposed Development is consistent with the regional policy objectives of the RSES that seek to implement the growth targets and national policy objectives of the NPF.

### 3.5.3 Fingal County Development Plan 2013 – 2019

The Fingal County Development Plan 2017 – 2023 (hereafter referred to as the Development Plan) came into effect on the 16 March 2017 and is the statutory land-use plan governing the subject lands at this time.

#### Core Strategy

Objective SS02 of the Development Plan seeks to ensure that all proposals for residential development accord with the County's Settlement Strategy and are consistent with Fingal's identified hierarchy of settlement centres.

The proposal includes the development of 172no. residential units, approximately only 15% of the remaining units allocated for Portmarnock (as of September 2019) under the provisions of the Core Strategy, as outlined in the below extract from Table 2.4 of the Development Plan as amended by Adopted Variation No. 2 (July 2020): -

**Table 2.4 Total Residential Capacity provided under Fingal Development Plan 2017 – 2023, updated as of September 2019**

Town/Village	Remaining Capacity (hectares)	Remaining Residential Units	Metropolitan Core % Land	Metropolitan Core % Units
<b>Metropolitan Area</b>				
<b>Key Town</b>				
Swords	481	14,799		
<b>Dublin City and Suburbs</b>				
Blanchardstown	260	9,306		
Howth	14	436		
Baldoyle/Sutton	29	1498		
Other Settlements*	66.5	2,320		
<b>Other Metropolitan Areas</b>				
Portmarnock	43	1,116		
<b>Self Sustaining Growth Towns</b>				
Donabate	101	3,532		
<b>Self Sustaining Town</b>				
Malahide	75.5	956		
Towns/Villages	92	844		
<b>Total Metropolitan</b>	<b>1,162</b>	<b>34,806</b>	<b>76%</b>	<b>81%</b>

The total residential capacity for Portmarnock as set out in Table 2.4 of the Development Plan, is 43 Ha, which can accommodate 1,116no. potential residential units. Since the adoption of the 2017 – 2023 Development Plan, planning permission has been secured for: -

- ABP Ref. ABP-300514-17 (Phase 1B) – 150no. units.
- ABP Ref. ABP-305619-19 (Phase 1C) – 153no. units and a small local services centre.
- Reg. Ref. F14A/0132 (ABP Ref. PL06F.244401) – 270no. residential units (under construction). This site is located to the west of the Portmarnock lands on the western site of the Dublin – Belfast Train line.

- Reg. Ref. F15A/0258 – 121no. residential units (under construction). This site is located on the northern site of Station Road, opposite the permitted Local Centre (Phase 1C).

Overall, the development of the Portmarnock lands in conjunction with the sites in proximity will provide a sufficient number of residential development to meet the targets set out in the Development Plan as summarised in the below table.

Phase / Area	No. Units Permitted / Proposed
Phase 1B (Completed)	150no. units
Phase 1C (Under Construction)	153 no. units
Phase 1D (Currently Proposed)	172no. units
Reg. Ref. F14A/0132	270no. unit
Reg. Ref. F15A/0258	121no. unit
<b>Total</b>	<b>Approx. 866no. units</b>
<b>Total set out in the Core Strategy</b>	<b>1,116no units</b>

**Table 3.1:** Existing, Permitted and Proposed residential development within proximity of the Proposed Development.

The Proposed Development supports the appropriate growth of Fingal County by ensuring that development takes place on residentially zoned land within Portmarnock, which is a ‘Consolidation Area within the Metropolitan Area’. The Proposed Development is therefore consistent with the Settlement Hierarchy, as outlined in Table 2.5 of the Development Plan as amended by Adopted Variation No. 2: -

**Table 2.5 Fingal Settlement Hierarchy**

Metropolitan Area	Core Area
Dublin City and Suburbs Consolidation Area Blanchardstown Baldoyle Castleknock Clonsilla Howth Mulhuddart Village Sutton Santry (Incl. Ballymun) Balgriffin & Belcamp Charlestown & Meakstown	
Key Town Swords	
Other Metropolitan Areas Portmarnock	
Baskin	
Self Sustaining Growth Town Donabate	Self Sustaining Towns Balbriggan Lusk
Self Sustaining Town Malahide	Rush Skerries
Towns and Villages Portrane Coolquay Kinsealy Rivermeade Rowlestown	Other Core Towns and Villages Balrothery Loughshinny Ballyboghil Naul Balscadden Oldtown Garristown Ballymadun
Rural – Clusters and Rural Area See Chapter 5 entitled ‘Rural Fingal’ for a full list of rural clusters	

**Land Use Zoning**

The subject site is zoned both 'RA' (Residential Area) and 'OS' (Open Space), the objectives of which are to: -

**Objective RA:**

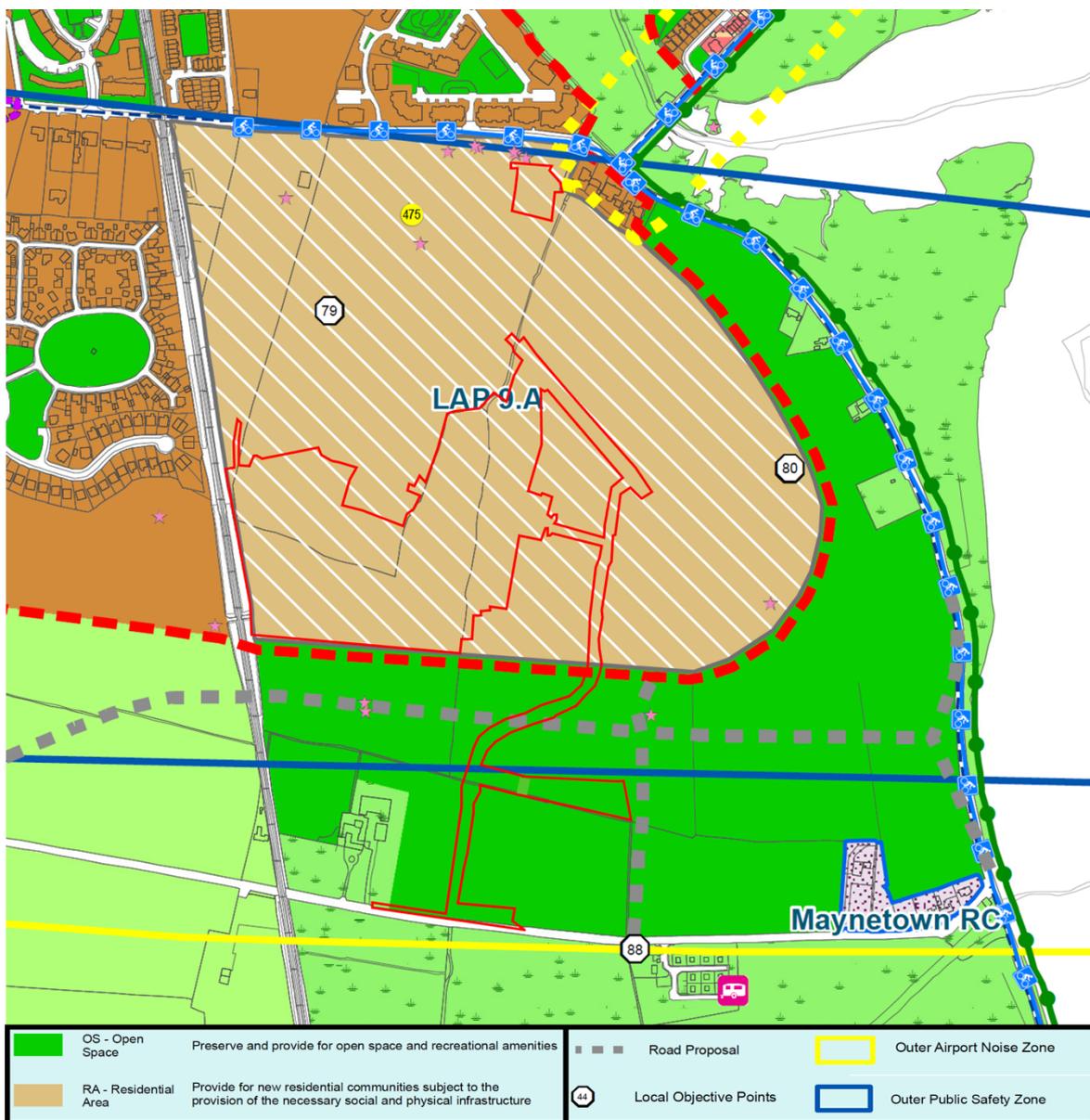
*"Provide for new residential communities in accordance with approved local area plans and subject to the provision of the necessary social and physical infrastructure".*

**Objective OS:**

*"Preserve and provide for open space and recreational amenities".*

The vision for 'OS' zoned lands is as follows: -

*"Provide recreational and amenity resources for urban and rural populations subject to strict development controls. Only community facilities and other recreational uses will be considered and encouraged by the Planning Authority."*



**Figure 3.2:** Extract from Map 9 of the Development Plan with the subject site outlined indicatively in red – permanent road shown as solid red line (SLA overlay). Please refer to Site Location Plan for definitive red line.

The uses being proposed on these RA zoned lands (i.e. the dwellings) are consistent with the zoning objective for these lands contained within the Statutory Development Plan.

The proposals have been devised having regard to the provisions of the Portmarnock South Local Area Plan and is therefore consistent with the zoning objective.

The zoning objective specifies uses which are '*permitted in principle*' or '*not permitted*'. Land uses, which are not specifically identified as being either '*permitted*' or '*not permitted*', will generally be considered open to consideration unless otherwise proved on their specific merits.

The proposed new road which connects with Moyne Road is required to unlock the future development of the residential area to the east of the townland boundary. Map 9 of the Development Plan contains a Specific Objective for a 'Road Proposal'. This is identified on the land use zoning maps for the Portmarnock lands (grey dashed line – Figure 3.2 above). These lines on Map 9 of the Development specifically state that the alignments are indicative (Local Area Objective 88 – See below). It is submitted that the proposed new permanent road which will follow the alignment of the permanent road identified in the Portmarnock South Local Area Plan (2013 – As Extended) is permissible on the lands zoned 'OS – Open Space' on that basis.

The 2no. small attenuation ponds proposed are associated with the permanent road connection with Moyne Road. The attenuation ponds are ancillary to the functioning of the new road to control surface water run-off.

The 2no. small attenuation ponds proposed are an amenity feature which forms part of the wider open space area designated to the south of the LAP lands. Open space is permitted in principle on lands zoned OS – Open Space. The attenuation ponds will be landscaped and integrated into the existing open spaces and on that basis is considered consistent with the zoning objective. This is consistent with the approach taken with the Regional Wetland which was constructed in Phase 1B which was granted planning permission by An Bord Pleanála under ABP Ref. 300514-17.

### Local Objectives

**Local Area Objective 79** states that: -

*"The visual impact on the Greenbelt of this new housing in Portmarnock will be minimised by its siting, design and by planting."*

Overall, the development is designed to site into the landscape which utilises the contours of the existing site to incorporate additional building height without impact on the surrounding views.

We refer the Board to the accompanying Landscape Design Rationale Report, Landscape Drawings and EIAR Chapter 12: Landscape & Visual Impact Assessment prepared by Brady Shipman Martin Built Environment Consultants for further detail in this regard.

**Local Area Objective 88** states that: -

*"This road improvement route is not fixed or indicative. It could be along existing Moyne Road alignment or another alignment."*

The proposed permanent road which will connect with Moyne Road is consistent with the alignment identified in the Portmarnock South Local Area Plan (2013 – As Extended) (see section 3.5.4 below). As such the proposed road is consistent with this Local Objective.

### 3.5.4 Portmarnock South Local Area Plan (2013 – As Extended)

The design of the Proposed Development on these lands has been guided by the Portmarnock South Local Area Plan (2013 – As Extended) (hereafter referred to as the LAP) that was adopted by Fingal County Council for these lands. We confirm that the Council have extended the life of this Local Area Plan until May 2023.

The LAP provides a framework for the proper planning and sustainable development of the Portmarnock South Plan lands. The delivery of new housing in Portmarnock South is to be focused on key locations, particularly those with links to public transport.

The Proposed Development is strategically located at lands at Portmarnock South, which are along the Dublin-Belfast Corridor, in close proximity to high frequency urban rail transport and have long been identified as a suitable location for residential development. At this location the Proposed Development is representative of plan-led development, that delivers significant additional housing in a range of house types in a consolidated, accessible urban neighbourhood.

Section 6.4 of the LAP sets out the transport and movement policies which are considered relevant to the current planning application, as follows: -

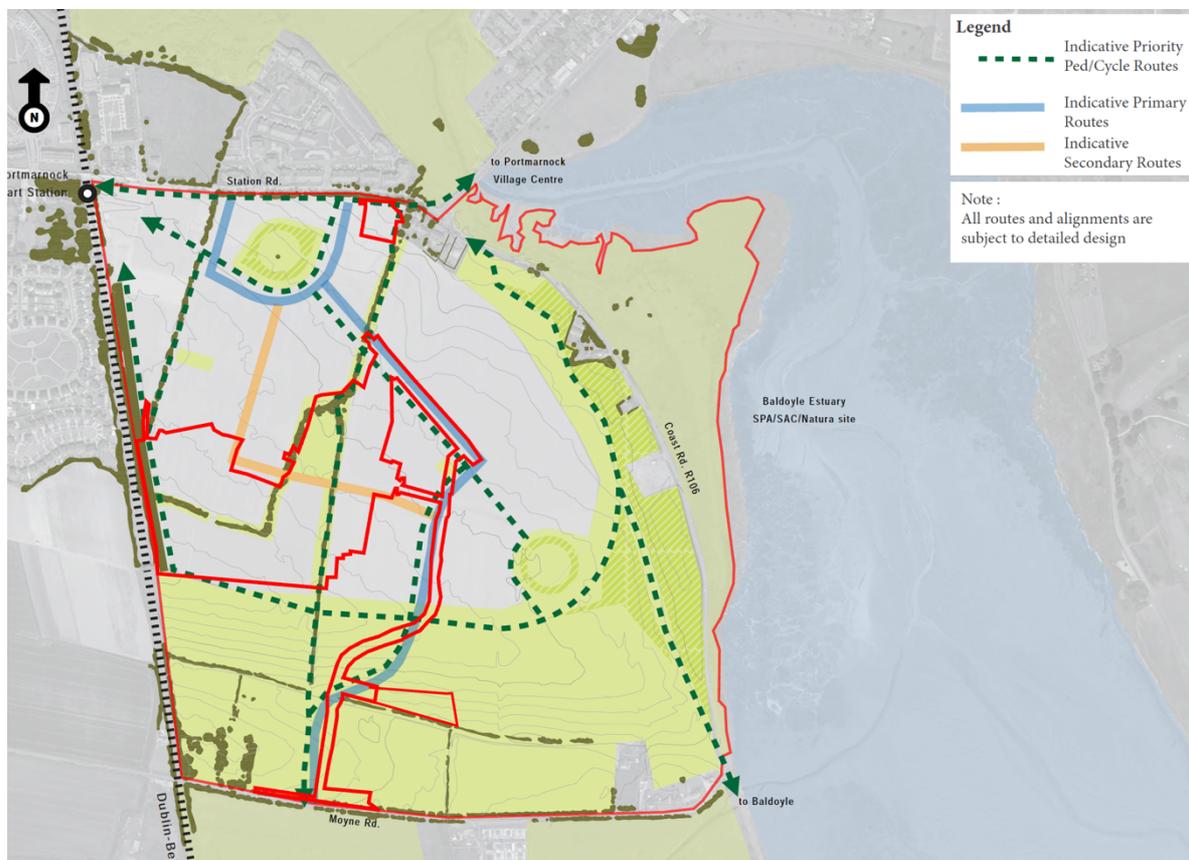
**Objective CF 1: -**

*“Provide a clear, safe and legible network of cycling and pedestrian routes within the LAP lands that will link key destinations, including local shops, services, schools, Portmarnock train station and other important local destinations and amenities and which will also provide linkages to the GDA Cycle Network.”*

The Proposed Development will be afforded contiguous dedicated cycle / pedestrian connections with (inter alia) Portmarnock Train Station, the coastal cycle route, and the permitted Local Centre, by way of internal cycle / walkways.

Furthermore, the LAP identifies the indicative internal street network and movement strategy (LAP Figure 6.4). The LAP sets out that: -

*“The primary street runs through the plan lands generally in a north-south direction with a secondary east-west spur linking to the external road network of Station Road to the north and Moyne Road to the south. These streets will play a major role in terms of access and circulation and will link all neighbourhoods within the plan area.”*



**Figure 3.3:** Extract from Figure 6.4 of the LAP – the Site outlined in red (Overlay by SLA).

The proposed permanent road which will connect with Moyne Road is consistent with the alignment identified in the LAP.

Section 5 (Green Infrastructure) of the LAP has also been considered, we would note at this juncture that the planning application will be accompanied by (inter alia) the following documentation, which will comprehensively address many of the policy objectives set out in Section 5: -

- A Conservation Management Plan.
- A Tree and Hedgerow Survey and associated Arborist's Report.
- A Tree Planting Plan.
- Natura Impact Statement.
- A Construction & Environmental Management Plan.
- A SUDS Strategy.
- A Public Lighting Plan.

In accordance with **Objective GL 4** of the LAP to: -

*"Demonstrate in each planning application, how the Green Infrastructure and Landscape Strategy set out in Figure 5.1 has influenced the layout of development and in particular, how it is reflected in the design and layout of open spaces, linear parks and green routes."*

The Proposed Development represents a continuation of the development of the Portmarnock South LAP lands as part of the St. Marnock's Bay development, in line with the holistic vision for development of these lands contained in the LAP. The Proposed Development continues to facilitate the implementation of the LAP's 'Green Infrastructure and Landscape Strategy'. In particular, it retains the townland boundary hedgerow between the residential development and Skylark Park.

### 3.6 Characteristics of the Proposed Development

The Planning Application is accompanied by detailed drawings and a detailed Architectural Rationale, prepared by Burke Kennedy Doyle Architects, which provides a rationale for the design of the proposed scheme and the dwelling types proposed.

The Proposed Development subject of this SHD Planning Application will comprise generally of the following: -

- 172no. residential units consisting of 22no. duplex / apartments and 150no. houses ranging in heights between 1.5 and 3 storeys.
- Provision of public open space including Skylark Park, extension to Railway Linear Park and extension of Townland Boundary Linear Parks.
- Vehicular access to serve the development is proposed off the existing / under construction access points on roads serving the St. Marnock's Bay development.
- A new vehicular road is proposed to serve the Proposed Development which will connect with Mayne Road. The permanent road includes the provision of a new junction with Moyne Road and associated ancillary works including SuDs features to control surface water run-off.
- Upgrade of existing temporary foul water pumping station and storage tank to increase capacity.
- All associated and ancillary site development, infrastructural, landscaping and boundary treatment works.

### 3.6.1 Layout & Design

The Proposed Development provides a high quality, architecturally designed scheme within a landscaped setting, at a vacant site that is extremely well connected to public transport and local facilities that supports this density residential development. The Proposed Development has had regard to National, Regional and Local Planning Policy, as well as Ministerial Guidelines such as the Apartment Guidelines and the Building Height Guidelines.

An Architectural Rationale has been prepared by Burke Kennedy Doyle Architects to accompany this application. This sets out the architectural design approach to place making at this site and how this has been informed by: -

- The site context and existing development.
- The planning precedent set by the extant permission.
- Land use zoning.

The Architectural Rationale describes the proposed site layout and building character within the scheme which enhance its legibility and coherence, and the connections made through the site to enhance physical and visual permeability.

A detailed Housing Quality Assessment has been prepared by Burke Kennedy Doyle Architects to accompany this planning application, demonstrating the full compliance of the proposed apartment units with the relevant residential amenity standards.

### 3.6.2 Materials Strategy

We refer the Board to the accompanying elevational drawings, prepared by Burke Kennedy Doyle Architects for details of materials and finishes of the Proposed Development. A palate of materials and colours has been chosen to provide a robust, quality finish to the scheme while referencing the existing developments in the area.

### 3.6.3 Residential Development

Within the 172no. residential units being proposed in this case, there are some 27no. varieties of dwelling types being proposed. The following tables identifies the extent of housing and duplex accommodation envisaged within the scheme.

Houses			
House Type	No. of Units	GFA (m <sup>2</sup> ) / Unit	Min. Size – Guidelines 2007
House Type A1 – 3-bedroom	6	108.6	92
House Type A2 – 3-bedroom	19	108.6	92
House Type A3 – 3-bedroom	7	108.6	92
House Type A4 – 3-bedroom	7	117.6	92
House Type A5 – 3-bedroom	3	117.6	92
House Type A6 – 3-bedroom	1	117.6	92
House Type B1 – 3-bedroom	7	110.6	92
House Type B2 – 3-bedroom	11	110.6	92
House Type B3 – 3-bedroom	4	110.6	92
House Type C1 – 3-bedroom	9	118.0	92
House Type C2 – 3-bedroom	8	117.4	92
House Type C3 – 3-bedroom	1	118.6	92
House Type D1 – 4-bedroom	9	141.0	110

House Type D2 – 4-bedroom	2	142.0	110
House Type F1 – 4-bedroom	11	134.4	110
House Type F2 – 4-bedroom	5	135.6	110
House Type F3 – 4-bedroom	2	146.5	110
House Type F4 – 4-bedroom	5	146.4	110
House Type F5 – 4-bedroom	17	147.8	110
House Type G – 3-bedroom	11	114.0	92
House Type H – 4-bedroom	5	147.0	110
<b>Total</b>	<b>150</b>		
<b>Duplex / Apartment</b>			
<b>Unit Type</b>	<b>No. of Units</b>	<b>GFA (m<sup>2</sup>) / Unit</b>	<b>Min. Size – Guidelines 2020</b>
Type J1 – 2-Bed Apartment	4	78.5	73
Type J2 – 2-Bed Apartment	5	78.5	73
Type J3 – 2-Bed Apartment	2	83.5	73
Type K1 – 3-Bed Duplex	4	110.0	90
Type K2 – 3-Bed Duplex	5	110.0	90
Type K3 – 3-Bed Duplex	2	110.0	90
<b>Total</b>	<b>22</b>		
<b>Overall Total</b>	<b>172</b>		

**Table 3.2:** Residential Schedule of Accommodation for the Proposed Development.

These details can also be found in the Schedule of Accommodation and Housing Quality Assessment, together with the House Type drawings (See Duplex & House Type Layout Brochure) prepared by Burke Kennedy Doyle Architects enclosed with this submission.

### 3.6.4 Density

The issue of residential density on this site is one of balancing the planning policy objectives regarding higher residential densities proximate to public transport, with the competing public safety interests of the public safety zones associated with Dublin Airport. This is specifically addressed within the Portmarnock South LAP.

The LAP contains a number of references to unit numbers and density that are worth considering in the context of this issue, as follows: -

#### Introduction

##### 1.3.6 Green Infrastructure and Landscape Strategy

*“The Green Infrastructure and Landscape Strategy devised for the Portmarnock South LAP lands allows for the absorption of **up to 1200 residential units** on these lands whilst protecting the essence of the existing landscape and fulfilling the green infrastructure objectives of the Fingal Development Plan.”*

#### Policy and Statutory Context

##### 2.1.1 Fingal Development Plan Core Strategy

*“The total number of units allocated for the Portmarnock South LAP area **c. 1200 units** is fully consistent with the Core Strategy of the Fingal Development Plan and the RPGs 2010-2022.”*

### 2.2.4 Land Use Zoning Objectives Relating to Portmarnock South

*“Objective RA: Provide for new residential communities in accordance with approved local area plans and subject to the provision of the necessary social and physical infrastructure.”*

*“Objective OS (Open Space): Preserve and provide for open space and recreational amenities”*

### 2.2.5 Local Objectives relating to the Plan Lands

*“Densities are limited by the outer public safety zone requirement that ‘no single half hectare plot should accommodate more than 60 persons’ (Environmental Resources Management (ERM) Report, ‘Proposed Public Safety Zones for Dublin Airport dated February 2005 refers).”*

*“408: **Density** shall be in accordance with (draft) public safety zones recommended by the Government.”*

## **Strategic Vision and Aims of the LAP**

### 4.2 Development Strategy Overview

*“The residential (RA) zoned lands within the Local Area Plan have the potential to achieve up to approximately **1200 residential units** based upon a density of **c. 42 units per hectare** which accords with airport safety zone criteria. This would equate to a potential population of **c. 3360 persons**....*

*To reflect the environmental and visual sensitivities of the plan lands traversed with many townland boundaries **as well as the airport public safety zone density restrictions**, flexibility regarding achievable maximum density across the plan lands is provided in this LAP..*

*an **average minimum density of 35 units per hectare** with an **average maximum density of 42 units per hectare** shall be considered to comply with the sustainable objectives of the LAP.”*

### **Summary of LAP in relation to Density/Capacity**

It is clear from the LAP that the following parameters are in place regarding ultimate capacity of the entire zoned ‘RA’ lands: -

- Up to 1,200no. residential units can be accommodated.
- Equivalent to 3,360no. people.
- That ‘no single half hectare plot should accommodate more than 60 persons’.
- The average maximum density can be 42no. units per Ha.

In contravention of the minimum density: -

- The average minimum density can be 35no. units per Ha.
- There are 32.3 Ha zoned ‘RA’ for residential development.

In particular it is worth highlighting the LAP advises that: -

*“The residential (RA) lands... have the potential to achieve up to approximately 1200 residential units based upon a density of c. 42 units per hectare which **accords with airport safety zone criteria**.”*

The net developable area excludes the Central Linear Park, Skylark Park, Railway Linear Park, landscaped southern edge of site, Inter-monument Route, primary link road to the South and secondary road link to junction with primary road where not servicing units in this phase. This is consistent with the methodology set out in Appendix A of the Sustainable Residential Development in Urban Areas 2009 for the calculation of net density and consistent with the approach also Phase 1B which was permitted by An Bord Pleanála (ABP Ref. ABP-300514-17 refers) and Phase 1C which was permitted by An Bord Pleanála (ABP Ref. ABP-305619-19 refers).

In Section 7.2 – Character Areas of the LAP it is set out with regard the Skylark Park Area that *“care also needs to be taken to preserve the views from higher ground”*.

Section 7.4 – Building Height of the LAP sets out with regard the southern edge of the LAP lands onto the ecological buffer zone / open space lands that heights should be no more than one and a half storeys.

The Proposed Development achieves a net density of c. 32.3no. units per Ha. The site is located in the Outer Public Safety Zone of Dublin Airport, in accordance with the airport safety zone criteria set out in the Development Plan. We confirm that Cyrrus Limited (Aviation Consultants) have reviewed the layout of the residential component of the Proposed Development with regard to the residential density restrictions required in accordance with these criteria. As such, the current layout is compliant with the requirement of no more than 60no. persons per 0.5 Ha.

Furthermore, the southern edges of the LAP lands mark the transition to more expansive open space area to the south, therefore, the building height and scale of development need to reflect the sensitivity of this edge. The Proposed Development along this edge includes a 1.5/2 storey house type to create an appropriate edge in terms of scale.

Overall, on the basis that the layout is within the limits of aviation restrictions and the scale of development towards the southern edge is suitably reduced the net density of the Phase 1D proposal is considered appropriate in this context.

### 3.6.5 Outer Public Safety Zone of Dublin Airport

Having regard to the location of the subject lands within the Outer Public Safety Zone of Dublin Airport, notwithstanding its location adjacent to Portmarnock Train Station, the over-riding requirement is to ensure that the density of development provided on these lands adheres to the findings of the 2003 ERM Report in the interests of public safety. This set as its upper limit for development within such zones a density of 60 persons for each half hectare.

Cyrrus Limited have been advising on this important point to ensure that the densities proposed adhere to the limits applicable within this Outer Public Safety Zone as dictated by the ERM Report. There is a continual balance to be struck in seeking to attain the density provided for within the LAP and still adhering to the public safety provisions set out in the ERM Report. We have assumed that the public safety provisions would take precedence. Further detail is contained in the Aviation Public Safety Zone Assessment prepared by Cyrrus Limited, enclosed with this SHD Planning Application.

### 3.6.6 Unit Mix

Unit Mix	
Unit Type	Percentage of Total Units
56no. 4 bed houses	32.6%
94no. 3 bed houses	54.7%
11no. 3 bed duplexes	6.4%
11no. 2 bed duplexes	6.4%

**Table 3.3:** Mix of unit typologies within the Proposed Development.

Overall, the housing typologies proposed, and the associated mix of unit sizes is consistent with the Development Plan's objective to encourage a wide variety of housing types, sizes and tenures which will support the establishment of sustainable residential community.

### 3.6.7 Part V – Social & Affordable Housing

Subsequent to dialogue between FCC Housing and the Applicant, the Applicant has prepared a Part V Proposal which consists of 17no. units. Marina Rennicks, FCC Housing Department confirmed in principle that the proposal contained in this submission are in order.

### 3.6.8 Drainage Infrastructure & Flood Risk

We refer the Planning Authority to the Engineering Assessment Report and Engineering Drawings prepared by JB Barry & Partners Consulting Engineers.

#### Wastewater

We refer the Board in the first instance to the Water Services Report and the Surface Water and Foul Drainage Drawings, prepared by JB Barry & Partners Consulting Engineers. These documents and drawings set out the detail in relation to water and drainage infrastructure requirements and design proposals for this scheme.

There has been extensive dialogue between Irish Water and JB Barry & Partners Consulting Engineers in relation to wastewater proposal to service the Proposed Development. Due regard has been given to the issues raised by both Irish Water and FCC as part of the Pre-Planning consultation for the Proposed Development.

As part of the SHD Planning Application for Phase 1B (Dún Sí), JB Barry & Partners Consulting Engineers liaised with Irish Water and it was demonstrated that there was sufficient capacity within the existing Mayne Road Pumping Station to cater for that development, notwithstanding the provisions of the LAP. The provision of a temporary private 24-hour storage tank, which will be removed once the permanent solution is operational was agreed. A Certificate of Feasibility issued by Irish Water at the time of making the SHD Planning Application for Phase 1B to confirm the above was acceptable in principle.

This process was repeated for Phase 1C (ABP Ref. 305619-19 refers). A Certificate of Feasibility was issued by Irish Water at the time of making the SHD Planning Application for Phase 1C as the principle had been established.

Subsequent to receipt of the permission for Phase 1C under ABP Ref. 305619-19, JB Barry & Partners Consulting Engineers submitted a Pre-Connection Enquiry to Irish Water and received a Confirmation of Feasibility (CoF) from Irish Water, dated 23 October 2019.

FCC subsequently requested an updated CoF as part of the SHD Pre-Planning engagement for Phase 1D. Irish Water in turn requested a re-submission of the pre-connection enquiry as it was in excess of 12 months old, for their review to confirm that no significant changes have occurred to the Irish Water wastewater network in the last 18 months, which would influence the feasibility assessment. The preconnection enquiry form was re-submitted in April 2021.

A bespoke CoF from Irish Water was received by JB Barry and Partners Consulting Engineers on 29 September 2021 which confirms connection to the foul network is feasible subject to certain upgrade works being carried out at the temporary pumping station (these upgrade works are included as part of this SHD Planning Application). The upgrades broadly include: -

- Additional operational storage (6 – 12 hours).
- Telemetry and PLC upgrades (to allow the 3 pumping stations to communicate with one another e. Existing Portmarnock Bridge Pumping Station, Mayne Road Pumping Station and St. Marnocks Temporary Pumping Station).
- Full detail of the upgrades provided in the Water Services Report and Interim Pumping Station Drawings, prepared by JB Barry and Partners Consulting Engineers.

The Applicant have been in contact with Irish Water regarding the delivery of the new Pumping Station required to serve the Portmarnock South lands in the longer term. This dialogue has been to impress upon Irish Water of the urgent need for the project and to ensure that the Irish Water project has regard to the subject proposals and also to ensure the proposals are co-ordinated in design terms to the extent necessary. The envisaged timeline for delivery of the new Irish Water Portmarnock Bridge Pumping Station is c. 2025.

It is intended to connect the foul sewerage from the proposed 172no. residential units of the development to the existing foul sewer network in the Portmarnock South LAP lands. The connection will be to the permitted Phase 1C development, which is currently under construction, immediately to the north of the Proposed Development.

The network discharges to an existing temporary pumping station adjacent to Station Road (constructed under the Phase 1B Development – Planning Ref: ABP–300514-17 refers) from where it is pumped to a gravity line which discharges to an existing foul sewer in Coast Road. This sewer discharges to the Mayne Bridge Pumping Station from where it is pumped to the North Fringe Sewer.

Ultimately, all foul flow from the Portmarnock South LAP lands will discharge by gravity to a proposed new Irish Water Pumping Station adjacent to Portmarnock Bridge from where it will be pumped directly to the North Fringe Sewer, south of Mayne River.

When the new Irish Water Pumping Station is operational (subject to planning permission being granted for same) all flows from the existing Phase 1A and 1B developments, the Phase 1C development currently under construction, this proposed Phase 1D and all future phases will be permanently diverted to the new pumping station.

The temporary pumping station, associated pipework and 24-hour emergency storage will then be decommissioned. The proposed new Irish Water pumping station and associated works are consistent with the requirements set out for disposal of foul effluent in Section 9.2, Wastewater Network and Treatment, Portmarnock South LAP.

### **Surface Water**

We refer the Board to the Water Services Report and the Surface Water Drawings, prepared by JB Barry & Partners Consulting Engineers.

The SuDS strategy adopted for this development provides a comprehensive approach to the management of storm water on the site. SuDS measures proposed, within the curtilage of dwellings (source controls), include the following: -

- Permeable paving for private driveways.
- Filter drains in patio areas and back gardens, where applicable.
- Water butts for the individual housing units for car washing, garden and plant watering.

SuDS measures proposed, within the wider application site (site controls), include the following: -

- Bio-retention areas within public open space.
- Swales running parallel to road carriageways / footpaths.
- Filtration trenches running parallel to road carriageways / footpaths / hard landscaping areas.
- Silt and Hydrocarbon interceptors for road carriageways / carpark areas.

The storm water network has been designed to cater for the existing Phases 1A and 1B, Phase 1C currently under construction, this Phase 1D and all future phases of the entire development of the Portmarnock South lands.

### **Water Supply**

We refer the Board to the Water Services Report and the Surface Water Drawings, prepared by JB Barry & Partners Consulting Engineers.

It is proposed to connect the Proposed Development to the existing watermain network in the Portmarnock South LAP lands which is ultimately fed from a 450mm extension from the North Fringe Watermain.

A bespoke CoF from Irish Water was received by JB Barry and Partners Consulting Engineers on 29 September 2021 which confirms that connection to the water supply network is feasible without any infrastructure upgrades to facilitate the Proposed Development.

### **Flood Risk**

We refer the Board to the Flood Risk Assessment (FRA), prepared by JB Barry & Partners Consulting Engineers.

The FRA confirms that the application site is located in Flood Zone C. The finished floor levels (FFL) of the proposed dwellings are between +8.75mOD to +14.9mOD which is significantly greater than the recommended minimum FFL of +4.73mOD. Access covers to the upgraded interim foul pumping station's storage tank and pumping chamber will also be set at a minimum of +4.73mOD. Therefore, the Proposed Development is appropriately mitigated from risk of flooding from the High End Future Scenario (HEFS).

### **3.6.9 Landscape Proposal**

The proposed landscape scheme is a key component of the integration of the new building environment with the existing and proposed landscape conditions having regard to the provisions of the land use zoning pertaining to the site and the Local Area Plan.

The Public Realm will provide unique features to distinguish the Proposed Development, such as the integration of the townland hedgerow boundary with Skylark Park. Furthermore, an extensive quantum of Class 1 public open space (approx. 107 Ha) in the form of the Regional Park land has been provided in Phase 1A – Reg. Ref. F13A/0248 to the east and south of the Local Area Plan lands.

Full details of the landscape design proposals are enclosed in the Landscape Design Rationale Report and Landscape Drawings, prepared by Brady Shipman Martin Built Environment Consultants.

### **3.6.10 Access & Transportation**

We refer the Board to the Traffic & Transport Assessment, prepared by JB Barry & Partners Consulting Engineers which provides a more detailed discussion.

#### **Access**

The Proposed Development will continue the internal road network where appropriate from the adjoining Phase 1A and Phase 1B (completed) and Phase 1C (under construction). Vehicular access to the Proposed Development will continue from Station Road until such time that the proposed new access road which connects with Moyne Road becomes operational.

The Proposed Development will include the construction of a new access road and junction onto Moyne Road serving the Proposed Development the existing Phase 1A and Phase 1B, the permitted Phase 1C under construction and the remainder of the Local Area Plan lands. The new access road will replace the Haul Road at Moyne Road (due for completion December 2021) and therefore continue to allow construction traffic to access the site from the south, minimising the interaction with Phases 1A / B / C and the general public.

Once the new permanent road becomes operational, residents will have the option of accessing the Proposed Development from the Station Road (north) or Moyne Road (south).

#### **Car Parking**

The Proposed Development includes the provision of 345no. car parking spaces. All parking within the development will comply with the Fingal Development 2017 – 2023.

### **Bicycle Parking**

The Proposed Development includes the provision of 30no. bicycle parking spaces to serve the 22no. duplexes. Bicycle parking for all houses will be provided on curtilage and in rear gardens where units have direct access to rear gardens.

## **3.7 Project Life Cycle**

The purpose of this section is to provide a description of the Proposed Development and consider all relevant aspects of the project life cycle both during construction and post construction. These include the following: -

- Construction Phase (Land Use Requirements, Construction Activity & Significant Effects).
- Operation Phase (Processes, Activities, Materials Used).
- Secondary and Off-Site Developments.

### **3.7.1 Construction Phase**

A 5 Year Planning Permission is being sought from An Bord Pleanála. A determination on the application is expected from An Bord Pleanála in early Q2 2022.

Allowing a reasonable period for mobilisation and site set up, it is expected that works will commence in late Q2 2022 subject to permission and the discharge of any pre-commencement planning conditions.

The Construction Phase will commence in Q2 2022 with the projected completion of the buildings expected towards the middle of 2024 (approximately 24 months).

#### **3.7.1.1 Construction Phase**

The Proposed Development will be built out entirely in one main construction programme, the assumed construction sequencing programme set out below is indicative of how the project will be constructed and occupied in the most efficient manner, delivering housing (including Part V housing) and public open spaces in tandem. At each stage of the Development some or all the following activities will be required.

- Archaeological watching brief.
- Geotechnical Investigation.
- Service infrastructure works.
- SuDs devices and petrol interceptors prior to construction of access road to Moyne Road.
- Site clearance and enabling works.
- Sub-structure works.
- Super-Structure works.
- External works and finishes.

The public open spaces within the scheme comprise Skylark Park and the Central Linear Park and Railway Linear Park together with the Inter-monumental Route / Primary Link Road to Moyne Road to the south. The plan is to service the construction of the area from west to east taking in indicative construction phasing areas 1 to 5. All Park areas will be built in sequence with housing construction, and the inter-monumental route and primary link road will be constructed at the later stages of the construction programme. The proposed Part V units are located throughout the site, and they will be completed in sequence together with all other housing and public open spaces.



**Figure 3.4:** Indicative Site Construction Phasing Plan.

The existing construction compound which was agreed with FCC as part planning compliance as part of Phase 1C (ABP Ref.: ABP-305619-19 refers) will continue to be used during the Construction Phase of the Proposed Development. The existing construction compound is located to the east of the townland boundary adjacent to Phase 1B.

### 3.7.1.2 Construction Activities

There are a number of construction activities involved in a project such as this. The activities (independent of phasing) can be divided into five general categories: -

- **Excavation:** This includes site clearing and earthworks – soil / rock removal – required to prepare the site for the foundations and residential floorspace above.
- **Structure:** Structure includes the foundations and the physical frame of the residential units.
- **Enclosures:** The enclosures for the buildings will be formed, block work, brick, timber, and glass, with slate roofs and flat roofs, all with the required levels of insulation and waterproof membranes.
- **Services:** The requisite services will be provided including drainage and lightning.
- **Landscaping:** The landscaping works include some hard landscaping, roads, footpaths, cycle-paths, bed and tree planting, and significant open spaces. In addition, there are a number of existing trees to be protected on site and incorporated into the new scheme.

### 3.7.1.3 Construction Access

The permitted Haul Road from Moyne Road (due for completion December 2021) will provide construction traffic to access the site from the south, minimising the interaction with Phases 1A / B / C and the general public. The site access gates will be established at both access points and egress points, as well as a dedicated pedestrian access routes for site personnel. Access will be strictly controlled via security personnel at each of the access points to the site. Further details can be found in the Construction & Environmental Management Plan accompanying this SHD Planning Application (See Appendix 3.1).

### 3.7.1.4 Air Quality – Dust & Dirt

The appointed Contractor shall put in place a regime for monitoring dust levels in the vicinity of the Site during the Construction Phase. The level of monitoring and adoptions of mitigation measures will vary throughout the Construction Phase depending on the type of activities being undertaken and the prevailing weather conditions at the time

The potential impacts associated with air quality during the Construction Phase are addressed in Chapter 9: Climate (Air Quality & Climate Change).

### 3.7.1.5 Noise & Vibration

It is not envisaged that any significant prolonged noise and vibration producing activities will be carried out onsite.

The potential impacts associated with noise and vibration during the Construction Phase, are addressed in Chapter 11: Air (Noise & Vibration).

### 3.7.1.6 Waste

A Construction & Environmental Management Plan, an Operational Waste Management Plan and Construction and Demolition Waste Management Plan have been prepared and are included with the SHD Planning Application. In addition, Chapter 14: Material Assets (Waste) of this EIAR includes details regarding the anticipated amounts of waste generated from the project, the subsequent potential impacts and the mitigation measure proposed to ameliorate any anticipated negative impacts.

In summary, all waste generated during the construction and operational periods is proposed to be appropriately disposed of in accordance with the Waste Management Plans.

### 3.7.1.7 Health & Safety Issues

The development will comply with all Health & Safety Regulations during the construction of the project. Where possible potential risks will be omitted from the design so that the impact on the construction phase will be reduced.

## 3.7.2 Operational Phase

The Proposed Development is a residential development consisting of houses and duplex's ranging in height from 1.5 to 3 storeys and amenity facilities.

The primary direct significant environmental effects will arise during the Construction Phase. As a result, the Operational Phase of the Proposed Development is therefore relatively benign and not likely to give rise to any significant additional impacts in terms of activities, materials or natural resources used or effects, residues or emissions which are likely to have a significant impact on human beings, flora and fauna, soils, water, air and climate.

The primary likely significant environmental impacts of the Operational Phase as a result of the Proposed Development are fully addressed in the relevant specialist chapters of this EIAR. These impacts relate to Population & Human Health, Landscape & Visual, Climate (Noise & Vibration) and Climate (Air Quality & Climate Change) associated with the traffic generated.

The Proposed Development also has the potential for cumulative, secondary and indirect impacts (i.e. traffic) and can be difficult to quantify due to complex inter-relationships.

However, all interactions and cumulative impacts are unlikely to be significant, have been addressed in Chapter 19: Summary of Cumulative Impacts and Interactions of this EIAR.

### 3.8 Related Development and Cumulative Impacts

Each Chapter of the EIAR includes a cumulative impact assessment of the Proposed Development with other planned projects in the immediate area.

Phase / Area	No. Units Permitted / Proposed
Phase 1A (Completed)	101no. units
Phase 1B (Completed)	150no. units
Phase 1C (Permitted – Under Construction)	153 no. units
Phase 1D (Currently Proposed)	172no. units
Future LAP Lands	Approx. 507no. units
<b>Total</b>	Approx. 1083no. units

The proposed number of residential units is 172no. in combination with the permitted Phase 1C (153no. units – A BP Ref. 305619-19 refers) and the future development of the remainder of the LAP lands (c. 507no. units) the cumulative number of units amounts to c. 832no. in total and therefore falls within the threshold requiring an EIAR as it comprises of 500no. dwellings or more.

Furthermore the site area the Proposed Development is c. 11.05 Ha and therefore above the threshold requiring an EIAR a combined area greater than 10 Ha.

The existing Marketing Suite permitted under FCC Reg. Ref. F20A/0604 will continue to be used to market the Proposed Development (located to the east of the townland boundary adjacent Phase 1B).

The future developable lands on the eastern half of the townland boundary will cater for c. 507no. additional residential units. A Development Framework was devised over several months and following multiple Pre-Planning meetings with the Planning Authority prior to the submission of Phase 1B (ABP Ref. ABP-300514-17 refers). The Development Framework provides a basis for discussion with the Planning Authority / An Bord Pleanála for future phases of development (refer to Appendix 3.2).

The potential cumulative impacts primarily relate to traffic, dust, noise and other nuisances from the construction of the development, with other planned or existing projects, and each of the following EIAR chapters has regard to these in the assessment and mitigation measures proposed.

As such, with the necessary mitigation for each environmental aspect, it is anticipated that the potential cumulative impact of the Proposed Development in conjunction with the other planned developments will be minimal.