

## **Chapter 2**

# **Project Description & Alternatives**

## 2.0 PROJECT DESCRIPTION AND ALTERNATIVES

### 2.1 INTRODUCTION

This chapter of the EIAR was prepared by Stephen Blair, BA (Mod), MRUP, MIPI, MRTPI, Executive Director with John Spain Associates, Stephen has over thirty years' planning experience working at the EU, national, regional and local levels including preparation of EIARs

This Chapter was reviewed by John Spain, BA (Mod), MRUP, MIPI, MRTPI, Managing Director with John Spain Associates. John has over twenty five years' experience in planning and development in Ireland and the UK and in the preparation and co-ordination of EIARs. In that time he has represented a large number of private and public sector clients and has been involved in a wide range of diverse projects.

David Ferguson BA, MRUP, MIPI, MRTPI, Senior Planner with John Spain Associates, Planning & Development Consultants also contributed to its preparation. David has over 5 years experience in the preparation of large scale planning applications and co-ordination of a number of EIARs in recent years.

A systematic approach in accordance with the Draft Guidelines on the Information to be Contained in EIARs (EPA, 2017), Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (Department of Housing, Planning and Local Government, 2018), and other EIA guidance documents , including 'Assessment of Plans and Projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC' (European Commission, 2021)', was used to ensure all relevant aspects of the development are accurately and fully described. The objective is to provide a description of the proposed development in sufficient detail, which when taken together with the description of the existing environment provided, will allow an independent reader without acquired technical environmental knowledge, to understand the significant effects likely to arise from the proposed development.

The description of the proposed development is set out in this chapter and the following chapters by each specialist consultant in terms of those environmental topics which will form the basis of the impact assessment process and the characteristics of the proposed development which could potentially affect population, human health, cultural heritage and archaeology, biodiversity, land and soil, water, air quality, climate, noise, vibration, landscape and visual impact, and material assets. The EIA Directive also requires that the description of the site, design, size or scale of the development, considers all relevant phases of the existence of the project from its construction through to its existence and operation.

The following terms are used throughout the EIAR and explained below for clarity:

1. The 'advanced infrastructure works' ('AI Works') is subject of a Section 34 application, and that which is currently under consideration by ABP (Ref. ABP-312189-21)
2. 'Ballygossan Phase 2' refers to the lands to the north in the ownership of Noonan Construction which has been the subject of an SHD pre-application to the Board (Ref. ABP 308583-20).
3. Off-site road improvements which were granted by ABP and FCC (ABP Reg. Ref. 309409; FCC Reg. Ref. F20A/0324) to provide the necessary upgrades to local road network.

This EIAR document fully reflects the key environmental factors of the project which were recognised from the scoping carried out by the design team and the level of detail required will vary considerably according to the sensitivity of the existing environment and the potential of the project for significant effects.

The project, which is the subject of assessment in this EIAR and the accompanying Appropriate Assessment Report and Natura Impact Statement, consist of the following:

## Project Description

The proposed development comprises 345 no. residential units comprising of 84 no. 1-bed units, 104 no. 2-bed units (68 no. 2-bed apartments and 36 no. 2-bed duplexes), 157 no. 3-bed units (118 no. 3-bed duplexes and 39 no. 3 - bed houses) ranging in height from 2 no. – 4 no. storeys.

The proposed development is set out in 8 blocks which comprise the following:

- Block A1 comprises 39 No. units at 4 storeys in height (Comprising a mix of 26 No. apartments & 13 No. Duplexes)
- Block A2 comprises 33 No. units at 4 storeys in height (Comprising a mix of 22 No. apartments & 11 No. Duplexes)
- Block B1 comprises 16 No. units at 3 storeys in height (Comprising all 3 bed Duplexes)
- Block B2 comprises 16 No. units at 3 storeys in height (Comprising all 3 bed Duplexes)
- Block C comprises 42 No. units at 2-3 storeys in height (Comprising 15 No. apartments & 27 No. Duplexes)
- Block D comprises 32 No. units at 2-3 storeys in height (Comprising 12 No. apartments and 20 No. houses)
- Block E comprises 62 No. units at 2-3 storeys in height (Comprising 38 No. apartments & 24 No. Duplexes)
- Block F comprises 66 No. units at 2-3 storeys in height (Comprising 39 No. apartments & 27 No. Duplexes)
- Block G comprises 25 No units at 2-3 storeys in height. (Comprising 20 No. Duplexes and 5 No. houses)
- Block H comprises 14 No units at 2-3 storeys in height. (Comprising 14 No. houses)
- Public Open Space of c.16,670 sqm (25% of net developable area) is proposed including the parkland and main public square, in addition to the linear park of c.2,427 sqm;
- c.2,272 sqm communal open space is proposed to serve the apartments;
- 414 car parking spaces in total are proposed including 40 visitor spaces, 3 for creche set down and 2 for creche staff parking within undercroft and at surface level.
- 802 No. bicycle parking spaces comprising including 128 No. visitor spaces and 10 No. to serve the creche;
- Childcare and community facility of c.377 sqm. located in Block C;
- Upgrades to the Golf Links Road including new pedestrian and cycle infrastructure with frontage on Golf Links Road;
- Vehicular access off the Golf Links Road is to be provided to the south east of the subject site;
- In addition the proposal will provide a new internal link road. This internal link road will connect to the adjacent lands to the north, for which a separate planning application has been made to Fingal County Council under Reg. Ref. F21A/0287 (ABP Reg. Ref. 312189-21);

The proposed apartments include the provision of private open space in the form of balconies to elevations of the proposed buildings. The development also includes vehicular, pedestrian, and cycle accesses, bicycle stores, lighting, landscaping, amenity spaces, drop off areas, boundary treatments, refuse facilities, services, utilities, substations, internal roads, footpaths and shared surfaces and all associated ancillary and site development works.

Figure 2.1 below illustrated the proposed SHD development.



**Figure 2.1: SHD Site Layout (source OMP Architects, 2022)**

The project will be facilitated by advance infrastructural works. These works were the subject of a Section 34 application to Fingal County Council (FCC F21A/0287) as required. They are currently on appeal to An Bord Pleanála (ABP Reg. Ref. 312189). They consist of a connecting road to the north, drainage infrastructure, cycle and pedestrian facilities, and associated landscaping (the “AI Works”). Cumulative and in combination effects of the Project with other plans and projects within the zone of influence are assessed, including the Advance Infrastructure Works (Ref. ABP-312189-21), the prior permission for off-site road improvements serving the wider area (ABP Reg. Ref. 309409; FCC Reg. Ref. F20A/0324), and the proposals by Noonan Construction for Ballygossan Park Phase 2. The location of these neighbouring proposed developments are shown on Figure 2.1 below.

In summary, the ‘Project’ which is subject of this EIAR, will result in the delivery of a residential development on lands (in the ownership of the Housing Agency) zoned for residential use in the Fingal County Development Plan 2017-2023.

As set out within this EIAR, the SHD Project, AI Works is intended to deliver a significant quantum of residential development.

## 2.2 SITE LOCATION AND DESCRIPTION

The project site is located to the south of Skerries town centre, Hacketstown, in the townlands of Milverton, Hacketstown and Townparks, Co. Dublin. The lands are bound to the north by residential areas now completed at Ballygossan Park Phase 1 and lands that are proposed for future residential development at Ballygossan Phase 2, to the west by the Dublin – Belfast railway line, to the east by Golf Links Road and which currently comprise agricultural fields. The project lands fall to north towards the existing drainage ditch which traverses the site west to east.

The project site (area of SHD within redline) is c. 6.7ha and is zoned 'RA-Residential' under the Fingal County Development Plan 2017 - 2023. The landholding comprises a series of agricultural fields traversed by hedgerows. To the north of the project site is a strip of land zoned 'OS Open Space' which it is proposed will provide a drainage infrastructure, vehicular access, pedestrian and cyclist paths under the AI application, which is now the subject of appeal to An Bord Pleanála. (Ref. ABP-312189-21).

Part of the lands immediately north of the project site (Ballygossan Park) have already been developed under Reg Ref: F11A/0309/E1, containing 103 no. dwellings plus a crèche.

The area in the wider vicinity of the site is characterised by one off housing on Golf Links Road with a rural nature to the south and east of the site. A more suburban character is apparent to the new residential estate to the north of the site (Ballygossan Park), with 2 storey self-contained housing forming the dominant character to the estate. The site has a section of frontage onto the Golf Links Road. A pedestrian link to the train station exists to the north of the site. To the west the site is bound by the Dublin-Belfast railway line.

The project site is not located within/ near any Architectural Conservation Areas, and there are no protected structures on site. The site is located within 1.8 km of Skerries Islands Special Protection Area which is a Natura 2000 site.

The project lands are also located within the designated 'Coastal Character Type' of the landscape character types. This is a large and important landscape comprising the coastline and the adjoining elevated land of which the subject site forms part.

The project lands are also designated as a 'Highly Sensitive Landscape' with the Fingal County Development Plan 2017-23. It is an objective of the Fingal County Council to protect sensitive landscapes from inappropriate development and to reinforce their character, distinctiveness, and sense of place. However, while the site is identified as part of the Highly Sensitive Landscape on the Development Plan Green infrastructure Map 1, it is identified by its land use zoning objective RA (Residential) on the Development Plan Green Infrastructure Maps 2 and 3. As set out in Chapter 6 of the LVIA:

*"It is also important to note that the entire urban area of Skerries (as well as the other coastal towns of Balbriggan, Rush, Malahide, Portmarnock and Howth) falls into the Coastal Character. Therefore, urban development per se is not precluded from the Highly Sensitive area, as that would preclude any further development/expansion of the existing urban areas - although it is required to be sensitively located and designed."*

Further the LVIA states:

*"Therefore, notwithstanding the site's location in the Coastal Landscape Character Type, for the purpose of this assessment – and in accordance with the GLVIA - the landscape is classified as being of medium sensitivity (to the type of development proposed)."*



**Figure 2.1: Site Location with approximate SHD application site outlined in red and approximate Advanced infrastructure Works site outlined in Blue (Source: Google Maps, 2022).**

### **Site Access**

The site will be linked by an existing access road from Ballygossan Park to the Golf Links Road which links the site to Skerries town centre to the north. The site is also accessed by 2 no. existing agricultural entrance to the east and south-east onto Golf Links Road. The site is within 1km of Skerries train station.

Access and connectivity improvements are proposed as part of the AI Works application under consideration with ABP (Ref. ABP-312189-21). This will include pedestrian and cyclist facilities and a new link road.

There are no footpaths on the western side of Golf Links Road at present, however the proposed development will implement a new pedestrian route along this frontage, without prejudicing future road improvement plans.

### **Local Amenities and Schools**

The project site benefits from close access to amenities in the town of Skerries. Section 4.4 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) relates to the provision of school spaces with large scale residential development.

A community and social infrastructure audit report has been prepared. The Report concludes that Skerries is accessible to a range leisure facilities including; football / rugby / GAA clubs, a number of public parks; a number of education facilities and a quantum of community facilities located throughout the town centre. There is currently only one post primary school facility in Skerries. We note that a site adjacent to the subject site (to the east) has been reserved for a new educational facility, although no planning applications have been made to date on this site.

As such the facilities that Skerries currently offers is very good and will be able to support the future residential development in Skerries.

## 2.3 PROJECT DESCRIPTION

### SHD Proposed Development

The proposed development comprises 345 no. residential units comprising of 84 no. 1-bed units, 104 no. 2-bed units (68 no. 2-bed apartments and 36 no. 2-bed duplexes), 157 no. 3-bed units (118 no. 3-bed duplexes and 39 no. 3 - bed houses) ranging in height from 2 no. – 4 no. storeys.

The proposed development is set out in 8 blocks which comprise the following:

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- c.2,272 sqm communal open space is proposed to serve the apartments;
- 414 car parking spaces in total are proposed including 40 visitor spaces, 3 for creche set down and 2 for creche staff parking within undercroft and at surface level.
- 802 No. bicycle parking spaces comprising including 128 No. visitor spaces and 10 No. to serve the creche;
- Childcare and community facility of c.377 sqm. located in Block C;
- Upgrades to the Golf Links Road including new pedestrian and cycle infrastructure with frontage on Golf Links Road;
- Vehicular access off the Golf Links Road is to be provided to the south east of the subject site;
- In addition the proposal will provide a new internal link road. This internal link road will connect to the adjacent lands to the north, for which a separate planning application has been made to Fingal County Council under Reg. Ref. F21A/0287 (ABP Reg. Ref. 312189-21);

The proposed apartments include the provision of private open space in the form of balconies to elevations of the proposed buildings. The development also includes vehicular, pedestrian, and cycle accesses, bicycle stores, lighting, landscaping, amenity spaces, drop off areas, boundary treatments, refuse facilities, services, utilities, substations, internal roads, footpaths and shared surfaces and all associated ancillary and site development works.

### **Site Area**

The site area of the proposed SHD development is c. 6.7 ha. The site is bound to the north by a riparian strip which traverses the lands west to east along a hedgerow. The lands slope downward towards the water course. The site is bound to the north by a newly constructed housing known as Ballygossan Park Phase 1, to the west by the Dublin–Belfast railway line, to the east by Golf Links Road and to the south by agricultural lands and individual houses.

The residential area immediately North of the site were recently completed under Reg Ref: F11A/0309/E1, for 103 no. dwellings plus a crèche in Ballygossan Park Phase 1. Proposals for Ballygossan Park Phase 2 are currently being prepared by the site owners and will be subject of a separate planning application.

### **Layout**

The proposed layout will create a sense of place through the creation of new spaces while respecting the context of the site and responding to future changes. The scheme creates people friendly streets and spaces through legible public open spaces that connect the distinct character areas within a sequence of interconnected shared courtyards provide secondary 'outdoor rooms' leading to the riparian strip green link to the north.

The Site strategy has two main components. Firstly, is the use of a shared garden courtyard typology to achieve more sustainable densities while employing more standard dwelling types. Secondly, is the culmination of the massing strategy in a four storey duplex typology to edge the riparian strip linear park. This allows an appropriately scaled architectural response to the local topography while retaining a lower scaled edge within the streetscape. The site layout represents a landscape-led organisation of public and private spaces connected to the existing neighbourhood by a structured hierarchy of primary and secondary networks. There are three character areas within the scheme including:

1. Parkland
2. Shared Gardens
3. Avenues and Streets

The northern portion of the development is the primary entrance to the scheme and has been designed to cater for the demands of a vibrant new community and merge with the existing built fabric. Here, townhouses are designed to provide greater density and variety in response to the topography. The tallest elements sit comfortably in the landscape. Through the creation of a new street there is a definitive edge to the park and eco corridor north of the proposed development.

The Shared Garden Blocks form a buffer to the railway along the site's western boundary. These spaces offer a higher sense of security and amenity for the residents of the surrounding townhouses and apartments. Shared gardens are only accessible via the semi-private entrances to the courtyards providing a sense of ownership and security to residents of the courtyards.

The southern portion of the proposed development is made up of a series of streets containing duplexes and three bed homes. This portion of the subject site sits on a higher elevation, as such the proposed units do not exceed three storeys. Home zones are proposed throughout these avenues to create a safe environment for pedestrians, cyclists and motorists. This area of the site benefits from access via Golf Links

road and excellent views eastward to the sea. The creation of a distinct hierarchy of open spaces and new streets are definitive features of the emerging landscape-led design.

## **Density**

The net residential density of the proposed development will be c. 52 units per hectare, which is based upon the total net developable site area of c. 6.6 hectares (gross site area 6.7 ha) and a total of 345 no. residential units. A large portion of the SHD site area will be used for public open space, drainage, particularly cycleways and pedestrian walkways. The proposed density makes use of the available area on site, allowing a sustainable density while achieving a high quality development and a sense of place.

## **Apartments Guidelines**

All apartments comply with *Sustainable Urban Housing: Design Standards for New Apartments — Guidelines for Planning Authorities* 2020. The apartments within the proposed development are not Build-To-Rent and as such conform to the guidelines and requirements for standard residential apartments. All units meet or exceed minimum standards and 100% of units are Dual Aspect, with a minimisation of exclusively north facing units. The Housing Quality Assessment prepared by OMP Architects, and which is contained within the Architect's Design Statement, is lodged with the planning application for the proposed development and provides further detail.

## **Landscaping and Open Space**

A high-quality landscape treatment is proposed for the scheme, with significant levels of open space provision. A total of 16,670 sqm of open space is proposed throughout the scheme which equates to 25% of the net developable area.

The landscape strategy considers a hierarchy of public, communal and private spaces throughout the development offering a variety of amenity for this mixed tenure and dynamic development. A 'ground-up' landscape-led neighbourhood organisation is proposed, structured by a clear hierarchy of primary and secondary street networks designed with reference to DMURS. Connections to local amenities - including the existing parade of shops c.400m north-east on Shenick Ave. and Skerries Railway Station to the north-west- and the wider context have been considered with regard to pedestrian, cyclist and vehicular networks.

Routes within the site and beyond follow desire lines through public open spaces and connect the key local amenities such as nearby playing fields via improved secondary networks centred on pedestrian and cycle use. A key design element of the proposed scheme is the addition of shared communal gardens. These spaces are in addition to the publicly accessible open space. They will be designed to facilitate users of all ages and to provide an amenity that addresses the recreational needs of users over the course of their lives.

## **Apartment/Duplex Units**

The proposed development primarily consists of apartment units with 306 no. units of the total 345 no. units being apartments/duplexes. Please see below detailed breakdown of the proposed apartment/duplexes:

- 84 no. 1-bed apartments
- 68 no. 2-bed apartments
- 36 no. 2-bed duplexes
- 118 no. 3-bed duplexes

Each of the proposed apartments/duplexes are consistent with the relevant standards set out in the Apartment Guidelines. Compliance with these standards will be set out below in Section 5.

## Houses

39 no. 3-bed houses are proposed to the south of the subject site. These houses are set out in 3 no. house types:

- House Type A (Semi-detached 115 sqm)
- House Type B (Mid-terraced 115 sqm)
- House Type C (Semi-detached 115 sqm)

## Height

The proposed development will range in height from 2 no.– 4 no. storeys. The proposed building heights have been designed to take cognisance of both the existing surrounding residential development and the Urban Development and Building Height Guidelines which allow for increased height in appropriate locations.

This SHD application is accompanied by a LVIA prepared by Modelworks, which is contained in Chapter 6 of the EIAR which highlights that *“The proposed development was assessed against the relevant policies and objectives of the FDP . It was found that the development complies with the policy and would achieve a number of key objectives for the site, with no negative impacts on the identified sensitivities. In summary the landscape change can be considered positive.”*

The LVIA concludes that: *“In conclusion, the proposed development would make a significant positive contribution to the evolving neighbourhood of Hacketstown, enhancing the urban landscape and visual amenities of the area”.*

## Childcare Facility

The Section 28 Sustainable Urban Housing; Design Standards for New Apartments; Guidelines for Planning Authorities 2020 states that:

*“Notwithstanding the Department’s Planning Guidelines for Childcare Facilities, in respect of which a review is to be progressed, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms”.*

The proposed development includes a creche and community of facility 377 sqm (equating to c 75 no. child spaces based on a space requirement of 4 sqm per child), which is considered to be suitably sized to cater for the future demand for childcare as a result of the proposed development.

## Site/Development Statistics

Please see below table showing a summary of the relevant site/development statistics:

<b>Site Area</b>	6.7ha
<b>Net Developable Area</b>	6.6 ha
<b>No. Units</b>	345 no. units
<b>Gross Density</b>	51.3 uph
<b>Net Density</b>	52 uph
<b>Building Height</b>	2 - 4 storeys
<b>Plot Ratio</b>	0.46
<b>Dual Aspect</b>	100%
<b>Part V</b>	70 units (20%)
<b>Public Open Space</b>	1.667 ha (25% of total site area)
<b>Communal Open Space</b>	2,272 sqm
<b>Car Parking</b>	414 spaces

<b>Bicycle Parking</b>	802 No. bicycle parking spaces comprising including 128 No. visitor spaces and 10 No. to serve the creche;
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## Transport and Access

Local connections provide opportunities within the proposed development. The site layout represents a landscape-led organisation of public and private spaces connected to the existing neighbourhood by a structured hierarchy of primary and secondary networks.

The hierarchy of roads serving the development range from local orbital roads to home zones. Due to the proximity to Skerries Station the proposed layout has been developed to incorporate but not depend on car usage.

The proposals include the provision of two vehicle access points. The main vehicular access is proposed to the south of the scheme proposals with a new three arm access junction directly between the LDA lands and Golf Links Road.

A second vehicle access point is to connect to the new link road proposed as part of advanced infrastructure application (Reg. Ref. F21A/0287). Further details of the internal streets layouts and site access junction is detailed in DBFL drawing 190170-DBFL-RDSP-DR-C-1001.

It should also be noted that an application was submitted to Fingal County Council for improvements to a number of off-site junctions in the vicinity of the subject site. This application was granted by An Bord Pleanála (FCC Reg. Ref. F20A/0324; ABP Reg. Ref. 309409) in July 2021, and will improve the surrounding road network for all road users and facilitate the proposed. The potential cumulative impacts of these proposed road improvements development with the proposed development, are assessed as part of this EIAR.

As set out in the Traffic and Transport Assessment Report:

*“The design of the internal streets have in reference to DMURS sought to (i) achieve a balance between the difference movement and place functions, (ii) accommodate all road user requirements, (iii) minimise the use of long straight sections of road carriageway with geometric initiatives introduced at appropriate spacings to actively manage and self-enforce appropriate internal vehicle speeds whilst retaining a legible street network, and (iii) to provide a positive advantage in terms of travel distance for active modes of travel.”*

## Car and Bicycle Parking

Given the accessible location of the subject site (as set out within the DBFL Consulting Engineers Transport & Traffic Assessment), 414 car parking spaces in total are proposed including 70 visitor spaces, creche set down and 3 for creche staff parking within undercroft and at surface level. This equates to an overall ratio of c. 1.2 spaces per residential unit.

- 372 no. residents spaces comprising:
  - 314 no. standard residential bays,
  - 19 no. disabled bays of which 6 are provided with EV charge points,
  - 39 no standard sized bays with EV charge points
- 35 no. resident visitor spaces
- 6 no. creche parking spaces (which can also be used as additional visitor parking at times when the creche is closed e.g. night time and weekends) comprising:
  - >3 no. spaces allocated to staff (and provided with EV charge points) and

- 3 no. drop-off / set-down spaces.
- 1 no. Dedicated Car Share (GoCar) bay

The number of car parking space provided within the proposed development is considered to be consistent with the Design Standards for New Apartments (2020), given the proximity to Skerries train station and town centre services. Please refer to the submitted Mobility Management Plan which sets out a robust justification for this level of parking provision.

The proposed development includes 736 No. bicycle parking including 120 No. visitor parking and 12 No. to serve the creche;. This level of provision is considered to be appropriate to accommodate the demand for both residents and visitors in accordance with the planning requirements.

### **Pedestrian and Cyclist Connectivity and Permeability**

The proposed development includes the construction of a new internal link road which will provide vehicular and pedestrian/cyclist access to the Ballygossan Park lands to the north. Also, a pedestrian/cycle link is proposed to the north east corner of the subject site to increase the permeability of the lands.

A new pedestrian/cycle pathway is proposed along the western boundary of the subject site to provide access to the existing and proposed pathway to the north west of the subject site included within the AI Works. This pathway will provide for accessibility to the Skerries train station.

### **Foul Sewer**

Foul water proposals are set out in full within DBFL's Engineering Services Report and associated drawings. The proposed foul sewer network layout for the development is shown on DBFL drawing 190170-DBFLFW- SP-DR-C-1021. Foul sewers have been designed and will be constructed in accordance with the Irish Water's 'Standard Details for wastewater infrastructure' and 'Code of practice for wastewater infrastructure'. The foul sewage will connect to the existing sewer in Ballygossan Park, and is then pumped to the Barnageeragh Wastewater Treatment Works. As set out in DBFL's Engineering Services Report:

*"The proposed designs for the foul sewers have been issued to Irish Water's Quality Assurance Team for approval as is required by An Bord Pleanala as part of the Strategic Housing Development process. Irish Water has reviewed the design submission and has confirmed by issue of a 'Statement of Design Acceptance' that the designs are in accordance with the Irish Water Quality Assurance requirements and code of practice."*

### **Surface water**

Surface water proposals are set out in full within DBFL's Engineering Services Report and associated drawings. Surface water management for the proposed development is designed to comply with the 'Greater Dublin Strategic Drainage Study (GDSDS) Regional Drainage Policies Technical Document – Volume 2, New Developments, 2005' and the 'Greater Dublin Regional Code of Practice for Drainage Works, V6.0 2005'. CIRIA Design Manuals C753, C697 and C609 have also been used to design the surface water drainage system within the site.

### **Sustainable Drainage Systems (SuDS)**

As set out within DBFL's Engineering Services Report, it is proposed to use a sustainable urban drainage systems (SuDS) approach to stormwater management throughout the site, the overall strategy aims to provide an effective system to mitigate the adverse effects of urban stormwater runoff on the environment by reducing runoff rates, volumes and frequency, reducing pollutant concentrations in stormwater, contributing to amenity, aesthetics and biodiversity enhancement and allow for the maximum collection of rainwater for re-use where possible

### **Flooding**

A Site Specific Flood Risk Assessment has been carried out by DBFL and is enclosed with the planning application in accordance with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities", November 2009. Following the flood risk assessment stages, it was

determined that the site is within Flood Zone C as defined by the Guidelines and based on the CFRAMS mapping. Therefore, the development of housing on the subject site is appropriate for the site's flood zone category and a justification test as outlined in the Guidelines is not required. The Guidelines sequential approach is met with the 'Justify' & 'Mitigate' principals being achieved.

The SSFRA outlines flood mitigation measures in Section 5.5. It is considered that the flood risk mitigation measures once fully implemented are sufficient to provide a suitable level of protection to the proposed development and will not cause an increased risk of flooding to external properties or to the downstream watercourse.

A regularly maintained drainage system will ensure that the network remains effective and in good working order should a large pluvial storm occur. In the event of extreme pluvial flooding then overland flood routes would direct water towards the open space areas and regional drainage facility<sup>1</sup>. Should extreme pluvial flooding occur in excess of the development's drainage capacity i.e. exceeding 1% AEP, then overland flood routes towards the on-site open spaces and drainage infrastructure would protect the development and houses with lowest proposed floor levels.

While the development constitutes 'highly vulnerable' development, it is appropriate for this flood zone and the scheme has been designed to ensure that the risk of flooding of the development is reduced as far as is reasonably practicable. The development does not increase the risk of flooding to adjacent area and roads once mitigation measures are implemented.

## **Watermains**

During the construction of the adjacent Ballygossan Park development, a 150mm diameter watermain was installed up to the boundary of the subject site, meant for future connection. The subject development will utilise this connection as main supply. A secondary connection is proposed to the existing 100mm dia uPVC along the southern boundary of the site. 150mm and 100mm diameter watermains and new fire hydrants will be provided throughout the site. A bulk water meter will be provided at the connection to the site. The supply arrangements will be carried out to the requirements of Irish Water. Refer to drawing number 190170-DBFL-WM-SP-DR-C-1031 for the proposed water main layout.

The water and servicing requirements have been designed in tandem with the Advanced Infrastructure works (AIA) which is under consideration by ABP (FCC Reg. Ref. F21A/0287/ ABP-312198-21).

## **2.4 PRINCIPAL ELEMENTS OF THE PROJECT**

### **2.4.1 Introduction**

The purpose of this section is to provide a description of the principal elements of the project during construction and operation. These include the following:

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

### **2.4.2 Description of Construction Stage**

This section of the EIAR summarises the construction and phasing of the proposed development and summarises the measures to be taken to ensure that the impact of construction activity is minimised. The *Construction and Environmental Management Plan* prepared by DBFL, which is included as a standalone report with this application, should be referred to for a more detailed assessment of the construction and phasing proposals for this development. There is no demolition taking place on site.

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<sup>1</sup> The regional drainage facility is the term given to the drainage infrastructure required to serve both the Ballygossan Phase 2 and the SHD lands subject of the advance infrastructure works. It is in essence a local piece of infrastructure and does not serve any other developments in a wider catchment area.

## Construction Activities

The Construction and Environmental Management Plan [CEMP], prepared by DBFL Consulting Engineers and submitted with this application, sets out the provisions for the construction phase of the proposed development. This CEMP addresses noise and vibration, traffic management, working hours, pollution control, dust control, road cleaning, compound/public health facilities and staff parking, all associated with the construction works.

## Potential Impacts of the Construction Stage

There are a number of impacts that may arise during the construction phase and which are subject to assessment in the relevant chapters of the EIAR and related application documentation. The CEMP includes a series of measures which will ensure potential impacts at construction stage area addressed. This list is non-exhaustive but covers the major issues to be considered in the assessment of potential impacts of the development, the CEMP covers the following areas:

- Traffic Management
- Road Cleaning
- Working Hours
- Construction Methodology
- Noise and Vibration
- Sediment and Water Pollution Control Plan
- Biodiversity Protection Measures
- Surface Water Drainage Works

## Construction Traffic

As set out in the CEMP prepared by DBFL:

*The site will be accessed from the existing site entrance from Golf Links Road. Traffic volumes are not anticipated to be significant and turning movements into the site shall be accommodated without delay. Warning signage will be provided for pedestrians and other road users on all approaches in accordance with Chapter 8 of the Traffic Signs Manual and the Contractor's Traffic Management Plan. See EIAR Chapter 11 Material Assets: Road Network & Traffic for further details.*

*During the general excavation of the foundations there will be additional HGV movements from the site. See EIAR Chapter 11 for further details. All suitable material will be used for construction and fill activities where possible and appropriate. All waste material will be removed to an authorised waste management facility.*

...

*In addition to the traffic generated by the disposal of surplus subsoil from the site, there will be traffic generated from deliveries of construction materials and equipment. It should be pointed out that construction traffic generated during the development works tends to be off-peak hour. Such trips would generally be spread out over the full working day and are unlikely to be higher than the peak hour predicted for the operational stage.*

For the duration of the proposed infrastructure works the maximum working hours shall be 07:00 to 19:30 Monday to Friday (excluding bank holidays) and 08:00 to 14:00 Saturdays, subject to the restrictions imposed by the local authorities. No working will be allowed on Sundays and Public Holidays.

**Phasing:**

The site development and construction phase for the Project will take place over a 5 year period.

Phase A comprises the portion of the SHD to the north as shown green on Figure 2.2 below  
Phase B comprises the balance of the housing as shown in purple in Figure 2.2



**Figure 2.2: Phasing Diagram prepared by OMP (2022).**

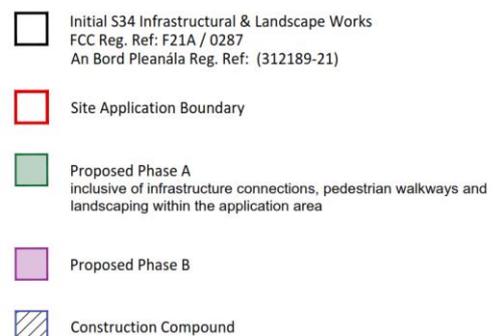
**Geotechnical Investigation**

The ground conditions are described in further detail in Chapter 7 Land and Soils and Chapter 8 Hydrogeology.

**Construction Methods**

The construction methodology that will be utilised on the site will have four main attributes to minimise the impact of the construction phase:

- Protection of Adjacent Areas;
- Excavation and Rock Breaking;



- Material Hoisting
- Waste Management Plan

### **Health and Safety**

The proposed development will comply with all relevant Health and Safety legislation and best practice during the construction of the project. Where possible potential risks have been omitted from the design so that the impact on the construction phase is reduced. The CEMP addresses these issues in greater detail and considers that the works associated with the development.

### **Noise and Vibration due to Construction Work**

The potential impacts associated with noise and vibration due to construction work, are addressed in Chapter 10 Noise & Vibration. The CEMP includes measures to monitor, reduce and eliminate where possible the noise and vibration levels.

All works on site shall comply with BS 5228 2009 which gives detailed guidance on the control of noise and vibration from construction activities.

A site representative responsible for matters relating to noise and vibration will be appointed prior to construction on site. A noise and vibration monitoring specialist will be appointed to periodically carry out independent monitoring of noise and vibration during random intervals and at sensitive locations for comparison with limits and background levels

All ancillary plant, such as generators and pumps, shall be positioned so as to cause minimum noise disturbance. If operating outside the normal working week acoustic enclosures shall be provided.

### **Air Quality and Climate**

The potential impacts associated with air quality due to construction work are addressed in Chapter 9 Air Quality and Climate prepared by TMS Environmental.

The OCEMP includes dust and dirt monitoring and mitigation measures, and complaints procedures to be taken should they be necessary.

A dust management plan (DMP) will be formulated for the site, which will address the following:

- *Specify a site policy on dust*
- *Identify site management of dust*
- *Develop documented systems for managing site practices and implementing management controls*
- *Outline how the DMP can be assessed*

A series of dust control and site management measures will be adopted as outlined in the OCEMP.

### **Construction Waste Management**

Chapter 12 'Material Assets – Waste' has been prepared by TMS Environmental for the proposed development, as well as an Outline Operational Waste Management Plan, and are included with this application. Both the CEMP & OOWMP have informed the relevant assessments included in this EIAR. The purpose of both reports is to ensure the best practice is followed in terms of waste and environmental management during the construction and operational phases of the proposed development, and to ensure adverse impacts on the receiving environment – including local residents - are minimised. A detailed waste management plan will be agreed with Fingal County Council and put in place in order to improve waste management on site, increase segregation and minimise construction waste costs.

Waste arising from the site will be considered in relation to the waste management hierarchy of prevention, reduce, reuse, recycle, energy recovery and disposal.

### **Construction Compound**

As set out within the DBFL CEMP: The compound shall be entirely within the site boundaries (located on Figure 2.2). Site accommodation to be provided will include suitable washing / dry room facilities for construction staff, canteen, sanitary facilities, first aid room, office accommodation etc. Access to the compound will be security controlled and all site visitors will be required to sign in on arrival and sign out on departure. The compound shall be constructed using a clean permeable stone finish and will be enclosed with security fencing. A permeable hardstand area will be provided for staff parking and these areas will be separate from designated machinery / plant parking. A material storage zone will also be provided in the compound area. This storage zone will include material recycling areas and facilities. A series of 'way finding' signage will be provided to route staff / deliveries into the site and to designated compound / construction areas. On completion of the works all construction materials, debris, temporary hardstands etc. from the site compound will be removed off site and the site compound area reinstated in full on completion of the works.

### **2.4.3 Description of the Operation Stage of the Project**

Pursuant to the EIA Directive, an EIAR is required to set out a description of the project processes, activities, materials and natural resources utilised; and the activities, materials and natural resources and the effects, residues and emissions anticipated by the operation of the project.

The proposed development is a residential development. The primary direct likely significant environmental effects will arise during the construction stage. The effect of the project during construction as operational phases are addressed in subsequent chapters of this EIAR. In addition a Mobility Management Plan, Transport and Travel Assessment and Road Safety Audit have been included with this application.

The primary likely and significant environmental impacts of the operation of the proposed development are fully addressed in the EIAR.

The proposed development also has the potential for cumulative, secondary and indirect impacts, with respect to each environmental topic within this EIAR. Each chapter within this EIAR addresses the cumulative, secondary and indirect impacts which the development may have. On the basis of the assessment carried out as part of this EIAR, it is considered that all cumulative secondary and indirect impacts are unlikely to be significant; and where appropriate, have been addressed in the content of this EIAR document.

### **2.4.4 Description of Secondary and Off-Site Developments**

As noted above the Advance Infrastructure works will provide enabling infrastructure which will facilitate the proposed SHD development. In addition the off-site road improvements granted permission (Ref. ABP-309409-21) will also facilitate the proposed housing development.

The proposed advance works consists of infrastructure works on a 2.5 hectare site at Hacketstown, Skerries to facilitate future residential development on lands zoned for residential development. These infrastructural works include:

1. Construction of 66m of a new Link Road, crossing the regional drainage facility and providing access to the future LDA SHD Scheme to the south from the existing Ballygossan Park to the north.
2. Construction of regional drainage facility (RDF) for the surface water management of the Hacketstown LAP Lands (which are made up of the Noonan Construction and Housing Agency lands) with:
  - a. Surface water pipelines, headwall structures and manhole to provide a link between the west and eastern RDF
  - b. 2 no mammal passes to facilitate the movement of mammals between the west and eastern RDF
3. Services to facilitate Ballygossan Park Phase 2:

- c. 2 new surface water outlet structures with accompanying pipework, manholes and bypass petrol interceptors
  - d. New foul sewer pipeline and manholes to connect to the existing foul sewer network
  - e. New watermain pipeline and associated valves and fittings to connect to the existing water network
4. Services to facilitate the LDA SHD Scheme:
- f. 3 new surface water outlet structures with accompanying pipework, manholes and bypass petrol interceptors
  - g. New foul sewer pipeline and manholes to connect to the existing foul sewer network
  - h. New watermain pipeline and associated valves and fittings to connect to the existing water network
5. Landscaping
- i. Construction of footpaths/walkways
  - j. Planting and landscaping of open space areas
  - k. Construction of a viewing deck
6. Public Lighting
- l. Provision of public lighting on Link Road & footpaths
7. ESB Overhead Power Lines
- m. Diversion and undergrounding of existing overhead power lines.
8. Utilisation of existing field gate on Golf Links Road as a temporary access road for construction traffic.

#### **Off-site Road Improvement Works Ref. ABP-309409-21**

The proposed development consists of:

- Reconstruction of the Miller's Lane/Shenick Road/Golf Links Road junction to provide for a four armed mini roundabout; Upgrading and extension of the two-lane flared approach to the junction on both the northern (Dublin Road) and south-eastern (Miller's Lane) arms of the existing three-arm roundabout junction;
- The provision of Zebra Crossing facilities on all arms of both junctions; The implementation of flat top calming ramps on all arms of both junctions (approximately 5m back from the roundabouts circulating carriageway);
- New street lighting system covering both junctions;
- The proposed development also includes upgrades to the junction of Downside Heights/Golf Links Road and a new cycle path along the Golf Links Road;
- New footpaths, cycle and pedestrian facilities, road gully's, road marking, signal and carriageway surfacing works;
- All ancillary site development works, landscaping and signage to support the development at the following junctions in Townparks and Holmpatrick, Skerries, Co Dublin: Miller's Lane/Shenick Road/Golf Links Road junction R127 Skerries Road/Miller's Lane/Dublin Road Roundabout, Downside Heights/Golf Links Road junction (and a section of the Golf Links Road).

## **2.5 PLANNING POLICY CONTEXT**

The planning application in respect of the proposed development on the subject lands is subject to national, regional, and local planning policy. The following outlines the key planning documents of relevance to the future development of the subject lands. This section will not address the detailed policies and objectives contained in the various plans which are relevant to the proposed development, as these are addressed in a separate bound Statement of Consistency prepared by John Spain Associates, which accompanies this planning application.

### **National Policy**

- National Planning Framework - Project Ireland 2040 (2018);
- Urban Development and Building Height Guidelines (2018);
- Sustainable Urban Housing: Design Standards for New Apartments (2020);
- Design Manual for Urban Roads and Streets (2019);

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009);
- The Urban Design Manual (A Best Practice Guide) (2009);
- Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines - Quality Housing for Sustainable Communities (2007);
- Smarter Travel: A Sustainable Transport Future - A New Transport Policy for Ireland (2009);
- The Planning System and Flood Risk Management – Guidelines for Local Authorities (2009); and
- Architectural Heritage Protection Guidelines for Planning Authorities (2011).

### Regional Policy

- Eastern and Midland Regional Assembly – Regional Spatial & Economic Strategy (RSES), (2018);

### Local Policy

- Fingal County Development Plan 2017-2023

The subject lands are subject to zoning objective 'RA – Residential Area' and partially zoned 'OS - Open Space' in the Fingal County Development Plan 2017-2022. Objective 'RA' seeks "Provide for new residential communities subject to the provision of the necessary social and physical infrastructure". The stated aims of OS zoned lands is to: 'Preserve and provide for open space and recreational amenities.' The Hacketstown LAP has now expired and thus is no longer a statutory plan for the area.

## 2.6 ALTERNATIVES EXAMINED

### 2.6.1 Introduction

Article 5 of the amended EIA Directive states that the information provided in an EIAR should include a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the final choice, taking into account the environmental effects.

Accordingly, the presentation and consideration of various alternatives considered by the developer and its project design team is an important requirement of the EIA process. This section of the EIAR document provides an outline of the main alternatives examined throughout the design and consultation process. This serves to indicate the main reasons for choosing the development proposed, taking into account and providing a comparison of the environmental effects in respect of the other main alternatives. For the purposes of this exercise, alternatives are described at three levels:

- Alternative Locations.
- Alternative Designs.
- Alternative Processes.

The DHPLG 2018 EIA Guidelines state:

*"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."*

Pursuant to Section 3.4.1 of the Draft 2017 EPA Guidelines, the consideration of alternatives also needs to be cognisant of the fact that "in some instances some of the alternatives described below will not be applicable – e.g. there may be no relevant 'alternative location'..."

The Draft 2017 EPA Guidelines are also instructive in stating:

*“Analysis of high-level or sectoral strategic alternatives cannot reasonably be expected within a project level EIAR... It should be borne in mind that the amended Directive refers to ‘reasonable alternatives... which are relevant to the proposed project and its specific characteristics’”.*

The key environmental and practical considerations which influenced the design of the proposed development and alternative layouts on the subject lands included the following:

- Consideration of the riparian strip which flows to the north of the site, and the need to protect and enhance the setting of this watercourse and ensure that no development is at risk of flooding;
- The quality of the urban environment to be delivered and the associated potential impact on human health;
- The requirement for public open space, and the need to respond to existing network of open space;
- The topography of the lands which falls toward the water course and rises to the south;
- The presence of the Dublin – Belfast trainline to the west;
- The emerging residential areas to the north and existing character of the wider area;
- Consideration of the loss of trees / hedgerows within the project site;
- The visual impact of the proposed development on the wider area and nearby residential proposals;
- The development context, including future adjacent residential and infrastructure development;
- Access, permeability and connectivity with surrounding areas and land uses including the train station, open space hierarchy and residential areas.

The following sections of this chapter of the EIAR contains an analysis of the alternative development options for the site, describing design options and changes which were incorporated into the scheme as the proposals progressed. The key considerations and amendments to the design of the scheme, having regard to and comparing the key environmental issues, are set out and discussed.

A ‘do-nothing’ scenario is not considered viable or appropriate, the proposed development is required in order to enable the future development of the residentially zoned lands to the north and south of the subject site. Therefore, having regard to the opportunity to redevelop an underutilised, appropriately zoned site at a sustainable location close to public transport and road infrastructure, a do-nothing scenario would leave a suitably zoned and located site empty, which is considered to be an inefficient use of the site and contrary to the implementation of the policies and objectives of the national, regional and local planning policy.

### **2.6.2 Alternative Locations**

The amended EIA Directive requires that Environmental Impact Assessment Reports include *“A description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.”*

*Article 94 and 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.”*

This section provides an overview of how the proposed development has evolved to date by way of consideration of alternative designs and how the development considered different layout options. Various

options were considered as the scheme progressed and key considerations and amendments to the design were incorporated, having regard to the key environmental issues pertaining to the lands.

**AS OUTLINED ABOVE**, the subject lands are subject to zoning objective 'RA – Residential Area' and partially zoned 'OS - Open Space' in the Fingal County Development Plan 2017-2023.

The 2018 DHPLG Guidance on the preparation of EIARs notes specifically that the consideration of some types of alternative, such as alternative locations, may not be appropriate in all cases. EIA is concerned with projects and the Environmental Protection Agency's draft guidelines (2017) state that, in some instances, neither the applicant nor the competent authority can be realistically be expected to examine options that have already been previously determined by a higher authority, such as a national plan or regional programme for infrastructure which are examined by means of a Strategic Environmental Assessment (SEA), the higher tier form of environmental assessment. As the subject site has been identified to accommodate the uses proposed, and the scale of development proposed, it is not considered appropriate to evaluate alternate locations in the EIAR.

The SEA Environmental Report for the Fingal County Development Plan 2017-2023 considered a range of alternatives in relation to the pattern of development (and in particular residential development) in the county as a whole. Three possible realistic alternatives have been identified based on the overall strategy of gaining maximum benefit from existing assets, such as public transport, social and green infrastructure. The alternatives would all form part of the overall development strategy for the Fingal Development Plan. The emphasis is on accommodating potential future residential/commercial development at appropriate locations proximate to existing public transport corridors/nodes. The consideration of alternatives has sought to protect strategic economic lands and the green infrastructure (natural heritage) as well as cultural heritage assets.

The SEA for the development Plan concludes: *The preferred alternative has a strong presumption against unnecessary greenfield development. This is positive as the unnecessary loss of greenfield gives rise to long-term permanent impacts on the receiving environment and is generally considered unsustainable. Whilst there is some development on greenfield lands due to the need to align with the 85:15 split and comply with the core strategy, growth will be directed to areas that have public transport corridors and wastewater capacity, therefore ensuring protection of surface and groundwater systems and providing sustainable transport access for residents.*

The proposal will contribute positively to the development of the wider area and optimises underutilised land at an appropriate location which is well serviced by infrastructure, transport and local facilities, and which has been zoned for development in successive County Development Plans.

The subject site and the surrounding area have the environmental capacity to accommodate the proposed development without any significant risk of impact upon environmental sensitivities due to the site location.

### **2.6.3 Description of Alternative Uses on the site**

The subject lands are zoned for residential use and partially zoned for Open Space. The overall site is located in close proximity to the Skerries Town Centre which hosts a range of social infrastructure, in addition to the high quality public transport provided at the Skerries train station. Planned residential areas to the north are currently undergoing development. In light of these nearby uses, the site's zoning, and current demand for high quality residential units, other land uses on site would not be considered appropriate alternatives or would not be in accordance with the planning policy context pertaining to the lands.

In this context, as noted above, the SEA for the Fingal County Development Plan considered alternative patterns of development for the county at a higher level including all residentially zoned lands. The proposed use of the site is considered to accord with the selected alternative set out within the SEA, in that the

proposal comprises residential development at a sustainable density on accessible, serviced lands that are located adjacent to the existing built up area.

#### **2.6.4 Description of Alternative Designs**

This section provides an overview as to how the proposed development has evolved to date by way of consideration of alternative designs and the iterative nature of the proposal now before the An Bord Pleanála. Various options were considered as the scheme progressed and key considerations were incorporated into the evolving project design, having regard to the key environmental issues pertaining to the lands.

The proposed SHD application is part of the development strategy for the area, as such alternative designs should not be considered in isolation of the anticipated residential development Ballygossan Park Phase 2 on the Noonan Construction lands to the north and advanced infrastructure application submitted in May 2021 (Reg. Ref. F21A/0287) which is intended to provide infrastructure for both developments.

##### **Alternative 1- Feasibility Options**

At an early stage in the project OMP Architects explored a series of feasibility options illustrated below in Figure 2.2

Option A entailed 360 No. units at a density of +50 u/ha with heights of 2-5 storeys.

Option B entailed 310 No. units at a density of 45 u/ha with heights of 2-3 storeys

Option C entailed 305 No. units at a density of 45 u/ha with heights of 2-3 storeys

Option D entailed 229 No. units at a density of 34 u/ha with heights of 2-3 storeys

The purpose of the early feasibility studies were to establish the broad design parameters for the scheme. The various options also explored how to make an appropriate use of land and respond to the existing site context. In particular the site layout was refined to respond to the topography of the site and adjacent residential sensitivities. At this stage environmental surveys such as traffic, biodiversity, noise, air quality etc were ongoing and acted to inform the design evolution.



Figure 2.2: Feasibility diagrams prepared by OMP architects (Source: OMP, 2022).

## **Alternative 2 – Scheme Submitted for Pre-Application Consultation with An Bord Pleanála**

On the 21<sup>st</sup> of October a request for pre-application consultation (PAC) on a strategic housing development application was submitted to ABP under Section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016. This application was made following a Section 247 pre-application consultation with the Planning Authority (Fingal County Council).

It should be noted that the adjoining site to the immediate north (Ballygossan Park Phase 2) is also proposed to be developed as a residential scheme and this has also been subject to a pre-application consultation procedure. Both schemes have been designed to integrate within an overall development strategy for these lands.

The proposed residential development was designed in accordance with the National Policy Guidelines including the National Planning Framework 2018, Design Standards for New Apartments 2020 and the Urban Development and Building Height Guidelines 2018 in addition to the Fingal County Development Plan 2017-2023.

Skerries is specifically identified as a 'Core Area' in the Settlement Strategy for the County Development Plan 2017-2023. The delivery of an appropriate scale of residential development at this location is therefore entirely in accordance with the confirmed policy approach to the development for this area. The subject site represents one of the last remaining opportunities to develop underutilised lands within the development boundary of Skerries which are zoned for residential use.

The development was designed in careful consideration of the Urban Design Manual criteria which it recommends should be used in the assessment of planning applications.

The rationale for the proposed layout was as follows:

- The character of the lands has influenced the design of the proposed development. The Belfast – Dublin trainline create a continuous boundary to the west.
- The topography of the site falls and rises 6m towards the centre of the lands which holds a shared SUDS and associated riparian zone.
- Existing field boundaries and hedgerows inform the layout and block structure of the development.
- Green links and vehicular access were proposed linking open spaces and destinations.
- The proposed layouts take account of adjacent planned development to provide one primary vehicular route north to south across the landscape feature, supplemented by two pedestrian/ cycle focussed links that will also span the preserved open space remedying current severance caused by the topography.
- Vehicular access will be provided via Golf Links Road to the south and to the existing Ballygossan Park via the new link road subject of FCC Reg. Ref. F21/0287.
- Permeable edges are presented to existing adjacent communities allowing new routes to established destinations and shared amenity of the open space.
- Local links through the development are provided by means of a coherent and connected open space strategy.
- Existing open spaces are harnessed as the 'green spine' of the open space strategy.
- The proposed framework takes full advantage of the pedestrian link to the train station, integrating it into a linear park through the shared development.
- A unique identity is provided by the existing landscape feature traversing the site.
- The proposed development provides for significant improvements to the public realm and pedestrian accessibility to the site.
- The routes within the site and beyond follow desire lines setup through the public open spaces and connecting the key local amenities.



**Figure 2.3 – Graphic representation of Initial Design Proposal (February 2020) (Source OMP) (approx. outline of site in red).**

### **Alternative 3 – Preferred Option**

The proposed option for the residential zoned lands has been informed by a consideration of the above-mentioned alternative schemes on site, in addition to the comments received at pre-application stage from ABP and the Planning Authority. This proposed residential development has been developed in tandem with advanced infrastructure application and to integrate the requirements the overall development strategy lay out. In particular, the alignment of the link road will enable access to the existing Ballygossan Park estate road to the north.

In terms of key design changes, an undercroft car park was introduced to provide an appropriate level of car parking provision given the site's location relative to public transport, while also improving the overall site layout.

The proposed SHD application is intended to respond to the Opinion by ABP in specific regard to: Design Strategy and Unit Typology, Layout, DMURS and Surface Parking, Open Space and Connectivity and Environmental Considerations.

In addition, this site strategy has been carefully developed through close coordination between the design teams involved with adjacent proposed development. The proposed design is intended to integrate with proposed advance infrastructure to the north, the aspirations of the local council and landholders to unlock these lands for residential development.



**Figure 2.4: Proposed Site layout plan (Source: OMP, 2022).**

### **Discussion of Environmental Reasons for Selection**

The environmental reasons for choosing this option are set out as follows:

#### Population and Human Health

The proposed development creates people friendly streets and spaces through legible new public open spaces that connect the distinct character areas within. Key to these are a sequence of interconnected

shared courtyards providing secondary 'outdoor rooms' leading to the riparian strip green link. The riparian strip itself forms the basis of a linear park linking the sites north and south and extending to the east, and allows the creations of a shared SUDS strategy.

The topography to the gully to the north is unsuited to conventional housing forms, so in order to ensure that all open spaces are overlooked by nearby homes and provide safe amenity for users, built forms in this location adopt a duplex typology to better enclose and supervise the route. It will create new recreational spaces while respecting the existing character of the site and responding to future planned development. Pedestrian and cyclist connectivity form a key basis of this approach.

The proposed development will provide for residential development with a density of c. 52 u/ha. The subject site is located within an 'Intermediate Location'. The Design Standards for New Apartments note that these locations are generally suitable for smaller-scale, higher density development that may wholly comprise apartments, or alternatively, medium-high density residential development of any scale that includes apartments to some extent (will also vary but broadly >45 dwelling per hectare net).

The subject site is currently located within 1.0 – 1.5km. to Skerries train station. As part of the proposed development a new pedestrian linkage will be provide to the north-west corner of the subject site which greatly improve the accessibility to the train station. Therefore, it is considered that the site falls into the intermediate urban locations category and is therefore suitable for densities above 45 u/ha. Higher and lower densities were considered however it was considered that this density represents a suitable intensity given the site's accessible nature and close proximity to Skerries Town Centre.

The proposed development provides for 2-4 no. storeys which is considered an appropriate height for the subject site given its designated as a 'highly sensitive landscape' within the Development Plan and the surrounding context of the site. The proposal achieves an appropriate balance in terms of optimal use of lands and transition with adjacent agricultural lands to the south.

### Biodiversity

This scheme is actively documenting and retaining hedgerows both for their shelter and food source values, for birds and invertebrates. Where possible, these hedges will be thickened with berrying and native planting to the pedestrian pathway that will run alongside, adding additional nesting sites through the woody mixes, with new bat boxes and taking care of the lighting and the need to minimize its spill beyond where strictly needed. The continuous corridor along the railway connecting to the shared courtyards will form a linked habitat network.

Co-ordinated water management will be achieved through a series of swales, planted on the sides and all discharging to a re-graded depression to ensure that this space is considered equally as the valuable natural resource that it is. This (seasonally ephemeral), stream, will be enhanced by an additional water source from run off, resulting in a more diverse habitat.

### Material Assets: Traffic

Cycle provision is relatively ad hoc in the vicinity of the site. A new cycle path is also proposed along the extent of the local access road which will link across the riparian strip and connect north and south development parcels. An integrated network of routes is proposed placing cycle and pedestrian links as a priority in accordance with Urban Design Principles and the proposed links within the Hacketstown LAP.

The scheme extends the existing cycle strategy through the site with a designated cycle lane along the main avenue. Pedestrian linkages to the train station are integrated into a cohesive landscape masterplan with public lighting and passive open spaces.

The proposed development will be entirely in compliance with the DMURS providing safe and efficient movement in the area. The proposed quantum of car parking is appropriate given the level accessibility and in the interest of encouraging more sustainable means of transport. One of the key design changes is the provision of an undercroft, this has been included as a result of the need to achieve an appropriate provision of car parking for residents, given the accessibility of the site.

### Landscape and Visual Assessment

The positioning of the various building typologies responds to both (a) LAP's density strategy – with the apartments in the northern part of the site closest to the railway station, and (b) the topography – with the apartment buildings providing enclosure to the valley park.

The proposed Blocks A1 and A2 would provide a strong built frontage to the valley park, and – as the most visible built element of the scheme - a distinct identity/sense of place for the new neighbourhood. The broad valley park can comfortably accommodate the four storey buildings, and would benefit from the enclosure, while the apartments would benefit from a high level of visual, recreational and general residential amenities as a result of their location fronting the park.

The development would incorporate three distinct character areas: (1) the Parkland, (2) Shared Gardens area, (3) Avenues and Streets. Each area would have a distinct identity within the new neighbourhood, and would contribute to variety in built form and architecture/'design solutions' (avoiding 'monotonous repetition' as required by the LAP).

The main street crossing the site from Golf Links Road to the new bridge is characterised by strong built frontage along its full length, but also variety in built form, with the urban character strengthening towards the north. The streetscape incorporates street trees breaking up the parking, footpaths both sides, and a dedicated cycle lane.

Key sensitivities included:

The vernacular cottage (and its setting) fronting Golf Links Road to the east of the site would be protected by the absence of any buildings in the vicinity. The LAP envisaged development in this area but none is proposed; the area forms part of the proposed valley park and would include a large new stand of woodland in addition to the retained existing vegetation along the stream.

Along the south east boundary, which is shared with a single house in a large open plot/field, it is proposed to locate a row of double-fronted duplex terraces (Block B). These buildings front the new main street crossing the site on their other (west) side. Their location on the main street requires them to be of 'urban' typology and scale, to generate the desired streetscape character and built enclosure. The buildings are thus three storeys tall. While the setting of the neighbouring house would be unavoidably changed, the combination of (a) the limited height of the buildings (three storeys), (b) the buildings facing (as opposed to backing onto) the boundary due to their double-fronted design, (c) the elevations being divided into volumes of brick and render to reduce the apparent mass, (d) the distinctive roof profile, and (e) the tree line proposed inside the boundary, would minimise the visual impact of the development on the house.

### Opinion of the Planning Authority (as expressed in pre-application consultations)

The development of this site for residential uses is considered acceptable in principle by Fingal County Council, the lands have been zoned for residential use in consecutive Fingal County Development Plans. The Planning Authority considered the unit mix, proposed heights, density of c. 50 U / ha to generally acceptable as the Planning Authority consider they will not unduly impact on the visual amenity of the area. The Planning Authority were generally supportive of the development on the subject lands. FCC considered that particular aspects of the scheme could be further enhanced and include additional detail prior to

lodgement of the application. The Council included 15 no. recommendations in respect of those matters and the Applicant has further evolved the design to respond to these matters.

In summary, the design of the proposed development takes into account all environmental matters raised for further consideration in respect to previous design alternatives and provides for a development that has been optimised to amplify positive environmental effects whilst reducing negative environmental impacts wherever possible. The proposed scheme is part of the wider development strategy for the LDA lands and responds to the characteristics and constraints of the project site vis a vis the previous iterations of the scheme and the alternative layouts considered.

### Summary of Environmental Reasons for Selection alternative

The proposed development has responded to a number of environmental constraints emerging from detailed assessment undertaken to inform the design, including utilities, visual impact and development of landscaping proposals as noted below:

**Table 2.1 Environmental impacts of the alternatives and assessment**

Environmental Factor	Comment
<p><b>Population and Human Health</b></p>	<p>The preferred alternative is optimal as it supports the development of residential units at an appropriate density and scale for the site without compromising safe and convenient movement within the wider lands. This is an essential part of the movement strategy for the lands.</p> <p>In progressing the landscaping design, the development has included planting as a buffer from residential areas and has allowed for the integration of public open space.</p> <p>The density, scale and general layout will provide future residents with a high quality development without compromising the amenity of nearby existing residential uses.</p> <p>The proposed layout has been determined by the layout of the existing services and infrastructure but is in keeping with the urban design principles of the LAP. In particular the future development of open space and circulation within the area.</p> <p>The proposed development provides for 2-4 no. storeys which is considered an appropriate height for the subject site given its designated as a 'highly sensitive landscape' within the Development Plan and the surrounding context of the site. The proposal achieves an appropriate balance in terms of optimal use of lands and transition with adjacent agricultural lands to the south.</p>
<p><b>Transport and Traffic</b></p>	<p>The alternative design layout did not have significantly different environmental effects to the proposed development insofar as traffic is concerned. A Transport and Travel Assessment was conducted at an early stage and informed the development strategy for the LDA lands.</p> <p>Proposed cycling and pedestrian infrastructure will support sustainable movement and circulation around the area. The layout provided a more convenient and efficient layout resulting in a safe pedestrian and cyclist environment.</p>
<p><b>Landscape and Visual Impact</b></p>	<p>The development layout and scale has been arranged in order to avoid negative landscape and visual impacts to the area. Key sensitivities were identified early in the design process and informed the site layout.</p> <p>Landscaping and materials will soften the appearance integrating the road with the existing and future network. Landscaping has been</p>

	included to soften the impact of the proposal. Omission of trees and landscaping would increase the potential visual impact locally of the road
<b>Waste</b>	The alternative design layout considered did not have significantly different environmental effect to the proposed development insofar as waste is concerned.
<b>Biodiversity</b>	A high-quality landscape treatment is proposed for the scheme, with significant levels of open space provision. The landscape strategy considers a hierarchy of public, communal and private spaces throughout the development offering a variety of amenity for this mixed tenure and dynamic development.  Landscaped areas and additional planting have been maximised to provide a contribution to the green infrastructure in the site.
<b>Do Nothing</b>	The existing scenario would be unchanged and the residentially zoned lands would remain undeveloped.
<b>Proposed</b>	The proposed option responds to the environmental studies undertaken.
<b>Environmental Impact</b>	Any initial proposal which did not respond to the environmental assessments, as outlined, has the potential for significant effects on the environment.
<b>Assessment</b>	The proposed option responds to all of the environmental constraints relative to the site which have been informed by the studies undertaken as outlined.

**Table 2.2 Comparison of impacts of the alternatives.**

(- neutral, ✓ positive, X negative)

	PHH	ACH	B	W	LS	NV	AQC	MAT	MAU	MAW	LVIA
<b>Strategic Housing Development</b>											
<b>Alt 1</b>	X	-	X	-	X	X	-	-	-	-	X
<b>Alt 2</b>	✓	-	✓	-	-	✓	-	-	-	-	✓
<b>Alt 3</b>	✓	-	-	-	-	-	-	✓	-	-	✓

- Population and Human Health (PHH)
- Archaeology and Cultural Heritage (ACH)
- Biodiversity (B)
- Water (W)
- Lands and Soils (LS)
- Noise and Vibration (NV)
- Air Quality and Climate (AQC)
- Material Assets - Traffic (MAT)
- Material Assets – Utilities (MAU)
- Material Assets – Waste (MAW)
- Landscape and Visual Impact Assessment (LVIA)

Alternative site layouts were considered with the objective of producing an overall high quality designed scheme accommodating in a complementary but clearly demarcated manner in a legible format within a high-quality residential development, which has undergone a robust consideration of relevant alternatives having regard to the comparison of environmental effects.

The preferred alternative was positive in relation to landscape and visual assessment in so far as key sensitivities have been addressed and the site layout has informed the overall design.

With reference to the final layout the iterative process outlined above considered how the permitted layout could integrate with the brief of the proposed development. The application has considered the feedback and opinions of An Bord Pleanála and Fingal County Council in arriving at the submitted layout.

The environmental issues which informed the design process related to landscape, water, traffic primarily. These considerations have informed the consideration of alternative layouts, open space, the issue of road and access arrangements up to the submission of the current scheme.

In summary, the design of the proposed development takes into account all environmental effects raised with respect to previous design alternatives for a development that has been optimised to amplify positive environmental effects whilst reducing negative environmental impacts wherever possible.

On the basis of the foregoing, it is considered that all reasonable alternatives to the proposed development were considered and no alternatives have been overlooked which would significantly reduce or further minimise environmental effects.

#### **2.6.4 Description of Alternative Processes and Technologies**

The relevance of alternative processes and technologies is limited in the case of this EIAR having regard to the nature of the proposed development, which is a residential development.

### **2.7 CUMULATIVE IMPACTS**

The proposed development also has the potential for cumulative, secondary and indirect impacts particularly with respect to such topics as traffic which in many instances are often difficult to quantify due to complex inter-relationships. However, all cumulative, secondary and indirect impacts are unlikely to be significant and have been addressed in the content of this EIAR document. As part of this Chapter JSA have carried out a review of the Online Fingal Planning Search noting the following developments, the results of which are included as appendix 2.1.

Each Chapter of the EIAR includes a cumulative impact assessment of the proposed development with other planned projects in the immediate area. 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 proposes.

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 and permitted developments (Ballygossan Phase 2 and the advance infrastructure works and off-site road works) will be minimal.

The project, which is the subject of assessment in this EIAR and the accompanying Appropriate Assessment Report and Natura Impact Statement, will be facilitated by advance infrastructural works. These works were the subject of a Section 34 application to Fingal County Council (FCC F21A/0287) and are currently on appeal to An Bord Pleanála (ABP Reg. Ref. 312189). They consist of a connecting road to the north, drainage infrastructure, cycle and pedestrian facilities, and associated landscaping (the “AI Works”). The Project, is assessed to ensure that cumulative and in combination effects of the Project with other plans and projects within the zone of influence, including the Advance Infrastructure Works (Ref. ABP-312189-21), the prior application for off-site road improvements serving the wider area (ABP Reg. Ref. 309409; FCC Reg. Ref. F20A/0324), and the proposals by Noonan Construction for Ballygossan Park Phase 2 have been fully assessed in order to enable the competent authority to undertake a lawful environmental impact assessment (“EIA”), appropriate assessment screening (“AA Screening”) and appropriate assessment (“AA”).

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.

## 2.8 MITIGATION MEASURES

Having regard to the details of the construction stage of development, as described above, the following mitigation measures are considered relevant to Chapter 2- Project Description and Alternatives. Each individual chapter deals with specific aspects of the proposed development and includes mitigation and monitoring measures where considered appropriate.

The Construction and Environmental Management Plan, which the building contractor will be contractually obliged to implement, will be implemented during construction of the development. It will remain a live document and may be updated as required. This Plan will reduce the impacts of the construction phase on local residents and ensure the local road network is not adversely affected during the course of the construction project, while methods such as those outlined in the pollution control section shall be implemented to mitigate any potential pollution events.

A Construction Waste Management Plan and Operational Waste Management Plan have been prepared in respect of the proposed development by DBFL and these will be implemented throughout construction and operation of the development. These Waste Management Plans meet the requirements of the Best Practice Guidelines for the Preparation of Waste Management Plans for Construction Projects.

## 2.9 CONCLUSION

This chapter of the EIAR has provided a description of the development proposal and outlined the reasonable alternatives considered by the developer.

In summary, the proposed development comprises road, landscaping, drainage and enabling infrastructure in order to facilitate the future delivery of residentially zoned lands.

## 2.10 REFERENCES

- European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, August 2018
- Draft Guidelines on the information to be contained in Environmental Impact Assessment Reports, EPA, 2017
- Environmental Impact Assessment of Projects – Guidance on the Preparation of the Environmental Impact Assessment Report (2017) – European Commission
- Implementation of SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans and Programmes on the Environment Guidelines for Regional Authorities and Planning Authorities DOELG, 2004
- Authorities Transposition of 2014 EIA Directive (2014/52/EU) in the Land Use Planning and EPA Licencing Systems - Key Issues Consultation Paper, Department of Environment, Community and Local Government, 2017
- Circular letter PL 1/2017 - Advice on Administrative Provisions in Advance of Transposition (2017)
- The requirements of Part X of the Planning Acts, and Part 10 of the Planning Regulations
- National Planning Framework 2018
- Fingal County Development Plan 2017-2022.
- Architectural Design Statement prepared by OMP (2022)