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# ENVIRONMENTAL IMPACT ASSESSMENT REPORT VOLUME 1: NON-TECHNICAL SUMMARY

Large-scale Residential Development '*Swift Square Apartments*'



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# EIAR VOLUME 1: Non-Technical Summary

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**Appendices**

See Volume 3 (A) and (B) of this EIAR

## Preface

The structure of the Environmental Impact Assessment Report (EIAR) is laid out in the preface of each volume for clarity.

This EIAR consists of three volumes as follows:

- **Volume 1:** Non-Technical Summary

A non-technical summary of the information contained within Volume 1

- **Volume 2:** Environmental Impact Assessment Report

This is the main volume of the EIAR. It provides information on the location and scale of the proposed development, details on design and impacts on the environment (both positive and negative) as a result of the proposals.

- **Volume 3:** Technical Appendices

Specialists' technical data and other related reports are contained within Volume 3. Volume 3 comprises parts A and B. Part A includes appendices associated with various specialisms. Part B includes verified views associated with **Chapter 14** (Landscape and Visual) of Volume 2 of this EIAR only.

## Glossary of Terms

Term	Meaning
AA	Appropriate Assessment
ABP	An Bord Pleanála
BCI	Bat Conservation Ireland
CDWMP	Construction and Demolition Waste Management Plan
CEMP	Construction Environmental Management Plan
CFD	Computational Fluid Dynamics
CIRIA	Construction Industry Research and Information Association
CMP	Construction Management Plan
CTMP	Construction Traffic Management Plan
CWMP	Construction Waste Management Plan
CoF	Confirmation of Feasibility
DMRB	Design Manual for Roads and Bridges
DMURS	Design Manual for Urban Roads and Streets
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
EPA	Environmental Protection Agency
ESB	Electricity Supply Board
ESR	Effort Sharing Regulation
EU	European Union
EV	Electric Vehicle
FCC	Fingal County Council
FCCC	Fingal County Childcare Committee
FRA	Flood Risk Assessment
FRM	Flood Risk Management
FRM Guidelines	Planning System and Flood Risk Management Guidelines
FRMPs	Flood Risk Management Plans
GFA	Gross Floor Area
GHG	Greenhouse Gas
GSI	Geological Survey Ireland
LRD	Large-Scale Residential Development
NBDC	National Biodiversity Data Centre
NIAH	National Inventory of Architectural Heritage
NPF	National Planning Framework
NPWS	National Parks and Wildlife Service
NTA	National Transport Authority
MASP	Metropolitan Area Strategic Plan
OPW	Office of Public Works
PRF	Potential Roost Features
NO <sub>2</sub>	nitrogen dioxide
PM <sub>10</sub>	Particulate Matter
PM <sub>2.5</sub>	Particulate Matter
pNHA	Proposed National Heritage Area
RSES	Regional Spatial and Economic Strategy

EIAR VOLUME 1: Non-Technical Summary

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<b>Term</b>	<b>Meaning</b>
RPS	Record of Protected Structures
RTP	Residential Travel Plan
SHD	Strategic Housing Development
SUDS	Sustainable Urban Drainage Systems
TFI	Transport for Ireland
TII	Transport Infrastructure Ireland
UÉ	Uisce Éireann (formerly Irish Water)

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# 1 INTRODUCTION

This Environmental Impact Assessment Report (EIAR) has been prepared as instructed by JOM Investments Unlimited Company to accompany a proposed Large-scale Residential Development (LRD) application at lands located to the north of Swift Square Office Park and Northwood Avenue, Santry, Dublin 9.

In summary, the proposed development will consist of site clearance and removal of all existing structures on site ancillary to the existing surface car parking and the construction of a residential development comprising 3 no. apartment blocks comprising 192 no. apartment units to include 4 no. 1-bedroom units and 188 no. 2-bedroom units, shared residential services (concierge, multifunction unit and gymnasium), and open amenity spaces over a basement. The location of the subject site and immediate context are shown in **Figure 1-1** below.

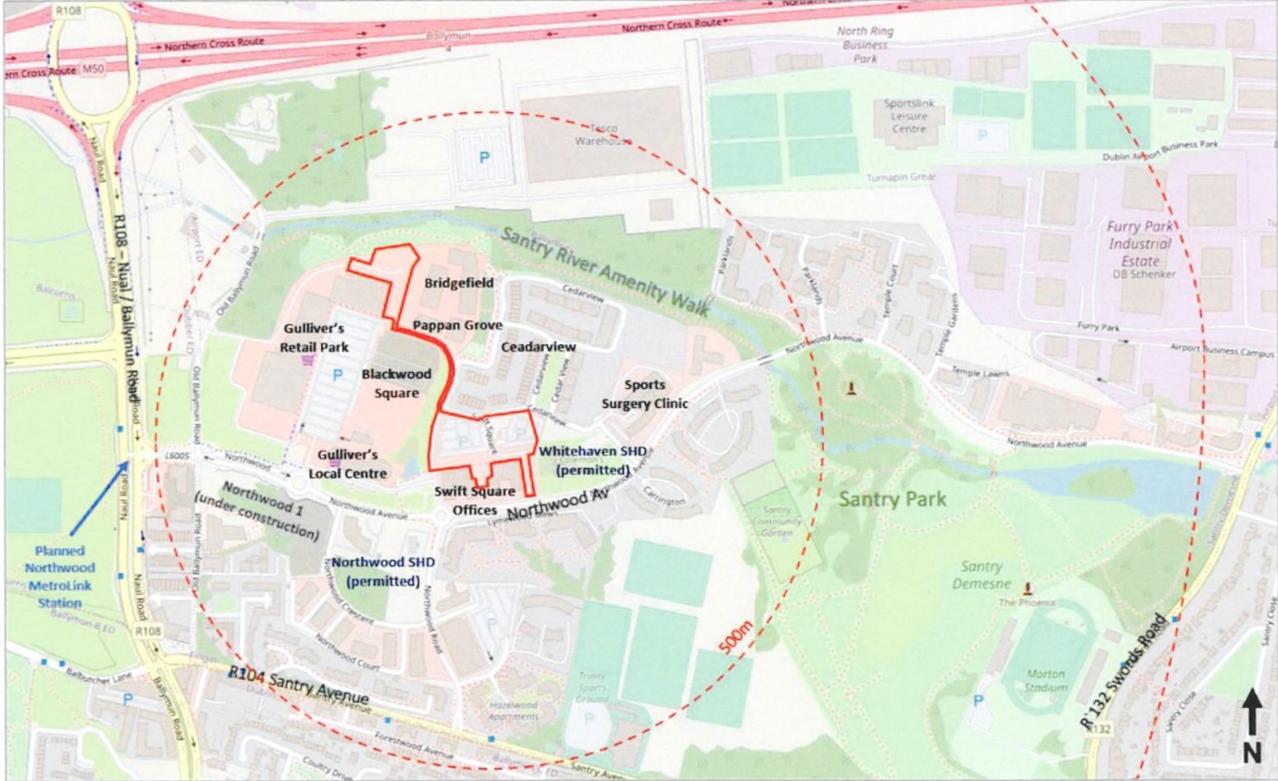


Figure 1-1: Site Location Map (indicative subject site outline in red)

Source: Open Street Map. Annotations by RPS

The following sections present a summary of the information contained in this EIAR. For detailed information and key mitigation and remedial measures, please consult the full EIAR document (Volumes 2 and 3).

## 1.1 Purpose of the EIAR

The objective of this EIAR is to identify and predict the likely environmental impacts of the proposed development; to describe the means and extent by which they can be reduced or ameliorated; to interpret and communicate information about the likely impacts; and to provide input into the decision making and planning process.

The EIAR is the primary element of the Environmental Impact Assessment (EIA) process and is recognised as a key mechanism in promoting sustainable development, identifying environmental issues, and ensuring that such issues are properly addressed within the capacity of the planning system.

## 1.2 Requirements for an EIAR

The *Planning and Development Regulations 2001* (Planning Regulations) specify the developments for which EIA will be required and the information that must be provided in an EIAR prepared in connection with the proposed development.

Screening is the term used to describe the process for determining whether a proposed development requires an EIA by reference to mandatory legislative threshold requirements or by reference to the type and scale of the proposed development and the significance or the environmental sensitivity of the receiving baseline environment.

The proposal has been screened by reference to the *Planning and Development Act 2000* (Planning Act) and the Planning Regulations.

The requirement for an EIA is set out under section 172 of the Planning Act. The proposed development is not of a class specified in Part 1 of Schedule 5 of the Planning Regulations. The proposed development is of a class specified in Part 2 of Schedule 5 of the Planning Regulations but does not equal or exceed the quantity, area or other limit specified in that part under class 10 “*Infrastructure projects*”, where the relevant threshold specified under class 10(b)(i) is “*Construction of more than 500 dwelling units*”. However, the proposed development does fall within class 13 “*Changes, extensions, development and testing*”, under which thresholds include:

*“(a) Any change or extension of development already authorised, executed or in the process of being executed (not being a change or extension referred to in Part 1) which would: -*

*(i) result in the development being of a class listed in Part 1 or paragraphs 1 to 12 of Part 2 of this Schedule, and*

*(ii) result in an increase in size greater than –*

*- 25 per cent, or*

*- an amount equal to 50 per cent of the appropriate threshold, whichever is the greater.”*

For clarity, the proposed development in isolation does not fall within the development classes listed in Part 1 or class 10(b)(i) of Part 2 of Schedule 5.

However, the proposed development is located immediately east and adjacent to a recently constructed residential development permitted under case Ref. ABP-306075-19 and amended by Ref. ABP-309416-21 for Blackwood Square Strategic Housing Development (SHD) for 330 no. units.

The proposed development is also located immediately west of a recently permitted SHD under case Ref. ABP-313317-22 known as Whitehaven, consisting of 255 no. units.

It has therefore been determined that the quantum of development now proposed (192 no. units) in addition to the adjacent permitted and proposed residential development would exceed the relevant threshold (i.e., 500 units) and that an EIA should therefore be undertaken to consider direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the proposed development.

The overall EIAR is arranged in three volumes, as follows:

### 1.2.1 Volume 1: Non-Technical Summary

A non-technical summary of the information contained within Volume 2.

### 1.2.2 Volume 2: Main Text

This is the main volume of the EIAR. It provides information on the location and scale of the proposed development, details on design and impacts on the environment (both positive and negative) as a result of the project.

The structure of Volume 2 of this EIAR is set out below:

- Chapter 1: Introduction
- Chapter 2: Consultation and Project Scoping

## EIAR VOLUME 1: Non-Technical Summary

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- Chapter 3: Planning Policy Context
- Chapter 4: Alternatives Considered
- Chapter 5: Project Description
- Chapter 6: Biodiversity
- Chapter 7: Land, Soils and Hydrogeology
- Chapter 8: Water and Hydrology
- Chapter 9: Air Quality
- Chapter 10: Microclimate: Sunlight and Daylight
- Chapter 11: Microclimate: Wind
- Chapter 12: Noise and Vibration
- Chapter 13: Cultural Heritage
- Chapter 14: Landscape and Visual
- Chapter 15: Material Assets: Traffic and Transport
- Chapter 16: Material Assets: Built Services
- Chapter 17: Population and Human Health
- Chapter 18: Climate
- Chapter 19: Cumulative Effects and Environmental Interactions
- Chapter 20: Schedule of Environmental Commitments

### 1.2.3 Volume 3: Appendices

Volume 3 Parts A and B contain specialists' technical data and other associated details that are directly related to Volume 2 of this EIAR.

### 1.2.4 Application Documentation

In addition to the information contained in the EIAR, a number of other standalone reports assessing environmental impacts are submitted with the planning application documentation. These documents have been considered in the preparation of the EIAR. These include:

- Planning Report & Statements of Consistency with Planning Policy prepared by RPS Group Ltd
- Statement of Specific Information Requirements of the LRD Opinion prepared by RPS Group Ltd
- Childcare Demand Analysis prepared by RPS Group Ltd
- Architectural Design Statement prepared by McCrossan O'Rourke Manning Architects
- Building Lifecycle Report prepared by McCrossan O'Rourke Manning Architects
- Housing Quality Assessment prepared by McCrossan O'Rourke Manning Architects
- Landscape Report prepared by Kevin Fitzpatrick Landscape Architecture
- Landscape Works and Maintenance Specification prepared by Kevin Fitzpatrick Landscape Architecture
- Arboricultural Report prepared by The Tree File Ltd
- Assessment of Sunlight & Daylight Access within the Proposed Development prepared by ARC
- Flood Risk Assessment prepared by J.B. Barry & Partners Ltd
- Water Services Report prepared by J.B. Barry & Partners Ltd
- Traffic and Transport Assessment prepared by J.B. Barry & Partners Ltd

## EIAR VOLUME 1: Non-Technical Summary

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- Residential Travel Plan prepared by J.B. Barry & Partners Ltd
- Construction Waste Management Plan prepared by J.B. Barry & Partners Ltd
- Construction Environmental Management Plan by J.B. Barry & Partners Ltd
- Draft Construction Management Plan prepared by J.B. Barry & Partners Ltd
- Stage 1 Road Safety Audit prepared by J.B. Barry & Partners Ltd
- Public Lighting Report prepared by McElligott Consulting Engineers
- Multiple Occupancy Building Car Charging Strategy for Swift Square Northwood Avenue, Dublin 9 by McElligott Consulting Engineers
- Energy Statement for Swift Square Apartments at Northwood Avenue, Santry, Dublin 9 prepared by McElligott Consulting Engineers
- Operational Waste Management Plan prepared by KeyWaste Management Ltd
- Owners Management Company Operational Management Plan prepared by WYSE Property Management
- Appropriate Assessment Screening Report prepared by Scott Cawley

### 1.3 Viewing of this EIAR

A dedicated website for this proposed development is established, enabling all elements of the planning application to be viewed. The details of this website are included in the planning application statutory notices.

The EIAR can also be viewed at Fingal County Council (FCC) as set out in the planning application statutory notices.

### 1.4 EIAR Study Team

The EIAR was prepared by a study team led by RPS Group Ltd (RPS), who were responsible for the overall management and co-ordination of the document.

The EIAR team is set out in **Chapter 1** (Introduction) of Volume 2 of this EIAR.

## 2 PROJECT SCOPING AND CONSULTATION

### 2.1 Consultation

In relation to consultation, the EIA Directive, Irish implementing legislation and recent guidance documentation makes clear that there are specific requirements regarding the use of the EIAR, both as a tool to inform concerned stakeholders and the public, as well as to make decisions regarding development consent for projects. Accordingly, this EIAR provides evidence of effective consultations that have already taken place and provides the basis for effective consultations.

The scoping and consultation processes have resulted in an iterative design procedure, such that the project has been modified to address the issues raised by statutory consultees and stakeholders. The Applicant and design team progressed and refined the design of the proposed development having due regard to the recommendations provided by FCC during the pre-planning consultations above-mentioned.

Three pre-application meetings took place with FCC with respect to the proposed development. A copy of the pre-planning consultation records is included in **Appendix 2.1** of Volume 3 of this EIAR. Following the last pre-consultation meeting (01<sup>st</sup> September 2022), FCC noted that the proposed development was acceptable in principle and could proceed to Stage 2 of the LRD process.

An LRD Meeting took place on 09<sup>th</sup> December 2022 with the Applicant, representatives of its design team and FCC. A copy of the LRD Meeting record is included in Volume 3 **Appendix 2.2** of Volume 3 of this EIAR, together with the LRD Opinion.

### 2.2 Scoping Report

An informal EIAR scoping exercise was undertaken as part of the EIAR process. During this process, information on the project and an outline of the proposed EIAR were provided to consultees inviting any comments, queries or observations from the contacted parties on the nature of the proposed development, the potential environmental impacts and the content of the EIAR. The EIAR Scoping Report was issued via e-mail to the following organisations on the 17<sup>th</sup> May 2022:

- FCC (Roads, Drainage, Environment Depts);
- Fingal County Childcare Committee;
- Irish Aviation Authority;
- Dublin Airport Authority;
- Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media;
- Department of Environment, Climate and Communications;
- Department of the Housing, Local Government and Heritage;
- Transport Infrastructure Ireland (TII);
- National Transport Authority;
- Inland Fisheries Ireland;
- An Taisce;
- Fáilte Ireland;
- The Heritage Council;
- ESB Networks;
- National Monuments Service; and
- Uisce Éireann (UÉ) (formerly Irish Water).

The primary objective of involving these organisations and parties at an early stage in the EIA process is to aid in the scoping of and the content of the EIAR. responses received. All comments and recommendations from each of the consultees have been taken into consideration in this EIAR.

## 3 PLANNING POLICY CONTEXT

### 3.1 Project Ireland 2040 National Planning Framework (2018)

*Project Ireland 2040* (2018) (Project Ireland 2040) is the primary articulation of spatial, planning and land use policy within Ireland up to 2040. The *National Planning Framework* (NPF) form part of Project Ireland 2040. It aims to avoid urban sprawl by promoting increased residential densities in urban areas, reducing pressure on infrastructure demands and adverse environmental impacts.

National Policy Objective 33 of the NPF states that it is a national policy to “*Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location*” (Page 92). The NPF expands on this objective, explaining that the future homes of Ireland will be built in locations that support sustainable development, such as cities and larger towns, with the provision of infrastructure and access to services that can be delivered in an efficient and appropriate way.

National Policy Objective 35 states that it is a national policy to “*Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights*” (Page 93).

National Policy Objective 3b states that it is an objective of the NPF to “*deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints*” (Page 29). In delivering these new homes, the NPF aims to achieve inclusive and sustainable communities that are finished to a high standard.

National Policy Objective 4 of the NPF aims to “*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*” (Page 55).

A number of “*key enablers*” for the growth of Dublin are identified in the NPF pertinent to the development of the subject site, including:

- Delivering Metro Link;
- Development of an improved bus-based system; and
- Progressing housing development on public transport corridors.

### 3.2 Housing for All - A New Housing Plan for Ireland (2021)

*Housing for All – A New Housing Plan for Ireland* (Housing for All) was published by the Government in September 2021 to provide a housing plan up to 2030. Housing for All seeks to improve Ireland’s housing system and deliver more homes of all types for people with different housing needs. The Government’s vision for the housing system over the long term is to achieve a steady supply of housing in the right locations with economic, social, and environmental sustainability built into the system.

Under the Housing for All, there are “*four pathways*” to tackling the housing crisis, which the Government says will lead to a more “*sustainable*” housing system. These are:

- Supporting home ownership and increasing affordability;
- Eradicating homelessness and increasing social housing delivery;
- Increasing new housing supply; and
- Addressing vacancy and making efficient use of existing stock.

Housing for All seeks to deliver more than 300,000 homes by the end of 2030 across the four categories of social, affordable, and cost rental, private rental, and private ownership. The intention is to provide an average of 33,000 homes each year, rising to 40,000 by 2030.

The number of social homes delivered each year is to rise from 9,000 in 2022 to 10,200 in 2030, bringing a total of over 90,000 social homes by the end of the decade. Housing for All also targets 54,000 affordable homes by the end of the decade, aiming to provide 2,000 cost-rental homes and 4,000 local authority affordable homes each year. Privately purchased and rented properties are meanwhile to increase from 11,500 in 2022 to 24,000 by the end of the decade.

### 3.3 Delivering Homes, Sustaining Communities (2008) / Quality Housing for Sustainable Communities (2008)

*Delivering Homes, Sustaining Communities – Statement on Housing Policy* sets out the fundamentals of the Government's vision for housing. According to this document, the core objective of housing policy in Ireland is to “enable every household to have available an affordable dwelling of good quality, suited to its needs, in a good environment and, as far as possible, at the tenure of its choice”. The document states that housing policy must reflect the needs of the growing population and diversity within Ireland.

The statement on housing policy is accompanied by *Quality Housing for Sustainable Communities* (the Sustainable Communities Guidelines). These are intended to assist in the implementation of the policies and objectives and focus on:

- “Promoting high standards in the design and construction and in the provision of residential amenity and services in new housing schemes;
- Encouraging best use of building land and optimal utilisation of services and infrastructure in the provision of new housing;
- Pointing the way to cost effective options for housing design that go beyond minimum codes and standards;
- Promoting higher standards of environmental performance and durability in housing construction;
- Seeking to ensure that residents of new housing schemes enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and
- Providing homes and communities that may be easily managed and maintained”.

The Sustainable Communities Guidelines state that good quality housing developments should be socially and environmentally appropriate, architecturally appropriate, accessible and adaptable, safe, secure and healthy, affordable, durable, and resource efficient.

### 3.4 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)

The role of the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* (Sustainable Residential Development Guidelines) is to ensure the sustainable delivery of new development throughout the country. It focuses on the provision of sustainable residential development, including the promotion of layouts that:

- Prioritise walking, cycling and public transport, and minimise the need to use cars;
- Are easy to access for all users and to find one's way around;
- Promote the efficient use of land and of energy, and minimise greenhouse gas emissions; and
- Provide a mix of land uses to minimise transport demand.

The Sustainable Residential Development Guidelines also provide guidance on the core principles of urban design when creating places of high quality and distinct identity. They recommend that planning authorities should promote high-quality design in their policy documents and in their development management process.

### 3.5 Urban Design Manual – A Best Practice Guide (2009)

The Urban Design Manual seeks to create residential developments where people want to live and visit. In order to achieve this, the Urban Design Manual is based on 12 no. criteria:

- |                |                    |
|----------------|--------------------|
| • Context;     | • Distinctiveness; |
| • Connections; | • Layout;          |
| • Inclusivity; | • Public Realm;    |
| • Variety;     | • Adaptability;    |

- Parking;
- Efficiency;
- Privacy and Amenity; and
- Detailed Design.

The 12 no. criteria are considered as a means of testing a proposal against the principles of good urban design.

### 3.6 Sustainable Urban Housing– Design Standards for New Apartments (2022)

The updated *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2022* (New Apartments Standards) builds on previous guidelines published in 2020, 2018 and 2015, taking account of; experience in their implementation since 2015 and a technical update in relation to 'Build-To-Rent'; accommodation. This update removes the distinct status of Build to Rent developments in the planning system, so all apartment developments shall now adhere to the same standards.

The guidelines acknowledge the importance of strategic sites in existing urban areas near public transport facilities. These locations are within reasonable walking distance (i.e., up to 10 minutes or 800-1000 m) to/from high-capacity urban public transport stops (such as DART or Luas); and sites within easy walking distance (i.e., up to 5 minutes or 400-500 m) of reasonably frequent (min 10 minute peak hour frequency) urban bus services are considered suitable for residential development such as that proposed.

The New Apartments Guidelines also sets out design standards that supersede Fingal Development Plan 2023-2029 standards in relation to:

- General locational consideration
- Apartment mix within apartment schemes
- Internal space standards for different types of apartments
- Dual aspect ratios
- Floor to ceiling height
- Apartments to stair/lift core ratios
- Storage spaces
- Amenity spaces including balconies/patios
- Car parking
- Room dimensions for certain rooms

### 3.7 Design Manual for Urban Roads and Streets (2013)

The *Design Manual for Urban Roads and Streets* (DMURS) provides guidance setting out an integrated and holistic approach to road and street design in our cities, towns, and villages.

The use of DMURS is mandatory on all urban roads and streets with a speed limit of 60 km/h or less, and it replaces the use of the Design Manual for Roads and Bridges (DMRB) in urban areas.

DMURS calls for an integrated approach to street design that incorporates not only what could be considered traditional engineering elements (such as geometric parameters) but also elements of urban design and landscaping that instinctively alter driver behaviour, resulting in lower speeds and, thus, a safer environment for all road users.

### 3.8 Urban Development and Building Heights (2018)

The *Urban Development and Building Heights – Guidelines for Planning Authorities* (Building Heights Guidelines) set out national planning policy guidelines on building heights in urban areas. The Building Heights Guidelines state that “*in relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility*”.

Section 3.2 of the Guidelines set out a number of criteria against which a proposed development shall be assessed. Specific Planning Policy Requirement 3 states that:

*“It is a specific planning policy requirement that where:*

- (A) 1. *an applicant for planning permission sets out how a development proposal complies with the criteria above; and*

2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;

then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise”.

### 3.9 Childcare Facilities - Guidelines for Planning Authorities (2001)

The *Childcare Facilities – Guidelines for Planning Authorities* (Childcare Guidelines) provide a framework to planning authorities for the preparation of forward planning documents and set a standard for assessing planning applications with consideration for childcare facilities.

The Childcare Guidelines state that planning authorities should require the provision of “one childcare facility providing for a minimum 20 childcare places per approximately 75 dwellings” (page 14). However, the Guidelines note that: “this is a guideline standard and will depend on the particular circumstances of each individual site” (Page 9).

### 3.10 The Planning System and Flood Risk Management (2009)

The Planning System and Flood Risk Management Guidelines (Flood Risk Guidelines) introduced “comprehensive mechanisms for the incorporation of flood risk identification, assessment and management into the planning process” (page iv).

The Flood Risk Guidelines were prepared by the Office of Public Works (OPW) in partnership with the then Department of Housing, Local Government and Heritage. The OPW are the lead agency for flood risk management in Ireland. They develop indicative flood maps and catchment-based Flood Risk Management Plans (FRMPs) in partnership with planning authorities, the Environmental Protection Agency (EPA) and other relevant departments and bodies.

Implementation of the FRM Guidelines will be achieved through actions at the national, regional, local, and site-specific levels. The Planning System and Flood Risk Management Guidelines (FRM Guidelines) assist in the preparation of relevant national and regional departmental publications and regulations, which in turn guide local planning authority policies and objectives. At a local level, the FRM Guidelines highlight that “flood risk is a key consideration in preparing development plans and local area plans and in the assessment of planning applications” (page 1).

The FRM Guidelines also state that they “should be utilised by developers and the wider public in addressing flood risk in preparing development proposals” (Page 1). When applying for planning permission, applicants and their agents are required to:

*“Carefully examine their development proposals to ensure consistency with the requirements of these Guidelines including carefully researching whether there have been instances of flooding or there is the potential for flooding, on specific sites and declaring any known flood history in the planning application form as required under the Planning and Development Regulations 2006.*

*Engage with planning authorities at an early stage, utilising the arrangements for pre-planning application consultation with regard to any flood risk assessment issues that may arise.*

*Carry out a site-specific flood risk assessment, as appropriate, and comply with the terms and conditions of any grant of planning permission with regard to the minimisation of flood risk”. (Page V)*

### 3.11 Part V of the Planning and Development Act 2000: Guidelines for Planning Authorities (2021)

The proposed development is subject to the requirement of Part V of the Planning Act. The planning application must be accompanied by the developer’s proposals for complying with Part V. The Part V Guidelines provide information on the requirement to and process for according to Part V legislation. The Part V Guidelines were updated in 2021 under Section 96 (3) (a) to increase the social housing requirement to all new residential development to 20% of the total no. proposed units.

### 3.12 Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities, 2009 (as amended)

The obligation to undertake appropriate assessment derives from Articles 6(3) and 6(4) of the Habitats Directive, and both involve a number of steps and tests that need to be applied in sequential order. The first test is to establish whether, in relation to a particular plan or project, appropriate assessment is required. This is termed Appropriate Assessment (AA) screening. AA is a focused and detailed impact assessment of the implications of the plan or project. If it can be concluded on the basis of AA that there will be no adverse effects on the integrity of a Natura 2000 site, the plan or project can proceed to authorisation. If adverse effects are likely, or in cases of doubt, the derogation steps of Article 6(4) will apply, but only in a case in which there are imperative reasons for overriding public interest. The Guidance provides information on the undertaking of AA.

### 3.13 Climate Action Plan 2023

The first Climate Action Plan (CAP) was published by the Irish Government in June 2019 (Government of Ireland, 2019). The Climate Action Plan 2019 outlined the current status across key sectors, including Electricity, Transport, Built Environment, Industry and Agriculture and outlined the various broadscale measures required for each sector to achieve ambitious decarbonisation targets.

The 2019 CAP also detailed the required governance arrangements for implementation including carbon-proofing of policies, establishment of carbon budgets, a strengthened Climate Change Advisory Council and greater accountability to the Oireachtas.

The Government published the second Climate Action Plan in November 2021 (Government of Ireland, 2021a) and a third update in December 2022 (Government of Ireland, 2022).

### 3.14 Regional Spatial and Economic Strategy

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region is a significant evolution of regional policymaking and replaces the Regional Planning Guidelines and shall support the implementation of the NPF and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Region.

The high-level vision set out in the RSES is:

*“To create a sustainable and competitive region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all.” (Page 6)*

This vision is underpinned by three key principles:

- *“Healthy Placemaking: To promote people’s quality of life through the creation of healthy and attractive places to live, work, visit and study in.*
- *Climate Action: The need to enhance climate resilience and to accelerate a transition to a low carbon economy recognising the role of natural capital and ecosystem services in achieving this.*
- *Economic Opportunity To create the right conditions and opportunities for the Region to realise sustained economic growth and employment that ensures good living standards for all.” (Page 4)*

The RSES includes a Metropolitan Area Strategic Plan (MASP) for Dublin, which is aimed at providing the metropolitan area with planning and investment frameworks to address high-level and long-term strategic development matters including strategic growth and development; transport and water infrastructure; regeneration, housing, and employment; and regional parks and pedestrian and cycling networks. The subject site is located within the MASP and is proximate to the Dublin – Belfast Corridor. The RSES supports the construction of MetroLink from Swords to Sandyford.

Regarding housing, the RSES identifies an acute need to increase the supply of housing, particularly within cities and defined settlements.

### 3.15 Transport Strategy for the Greater Dublin Area 2022-2042

The *Transport Strategy for the Greater Dublin Area 2022 to 2042* (Transport Strategy), prepared by the National Transport Authority (NTA), sets out an updated transport infrastructure strategy for the region, covering Dublin, Meath, Wicklow and Kildare up to 2042. It replaces the previous transport strategy

The overall aim of the Transport Strategy is:

*“To provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region’s climate change requirements, serves the needs of urban and rural communities, and supports economic growth.”* (Page 39)

### 3.16 Fingal Development Plan 2023-2029

The local planning policy framework is set out in the *Fingal Development Plan 2023-2029*. Future development of the subject lands is governed by the Fingal Development Plan, which sets out planning policies and objectives, as well as design standards for the administrative area.

The Plan is underpinned by four key cross-cutting themes; climate action, healthy place-making and sustainable development, social inclusion and high-quality design. The strategic vision of the Fingal Development Plan 2023-2029 is that:

*“Fingal will embrace healthy place-making and economic prosperity through building cohesive and sustainable communities, where our cultural, natural and built environment is protected.”* (Page 6)

Within the Fingal Development Plan 2023-2029, the site is subject to the land use zoning objective MRE (see **Figure 3-1**) - Metro and Rail Economic Corridor. The objective of this zoning is to:

*“Facilitate opportunities for high-density mixed-use employment generating activity and commercial development and support the provision of an appropriate quantum of residential development with the Metro and Rail Economic Corridor”* (page 488)



**Figure 3-1: Land Use Zoning**

Source: *Fingal Development Plan 2023-2029*

The vision for lands within this updated zoning objective is to:

*"Provide for an area of compact, high intensity/density, employment generating activity with associated commercial and residential development which focuses on the MetroLink or rail or light rail stations within settings of exemplary urban design, public realm streets and places, which are permeable, secure and within a high-quality green landscape. Landmark buildings will provide strong quality architectural features, which respect and enhance the character of the area into which they sit. The designated areas will form sustainable districts which possess a high degree of connectivity and accessibility and will be developed in a phased manner subject to the necessary provision of social and physical infrastructure"* (page 488)

Uses that are "Permitted in Principle" under the MRE – Metro and Rail Economic Corridor zoning objective include *inter alia*:

- Residential;
- Utility Installations; and
- Open Space.

The proposed residential development within a wider mixed-use community on Northwood Avenue, including employment and retail facilities, accords with the land use zoning.

The subject site is located partially (northeast corner) within the Dublin Airport Noise Zone C.

Policy objectives regarding the MRE included within the Fingal Development Plan 2023-2029 states:

*"Objective EEO15: Protect the integrity of the Metro and Rail Economic Corridor from inappropriate forms of development and optimise development potential in a sustainable and phased manner"* (Page 268)

*"Objective EEO16: Ensure high quality urban design proposals within the Metro and Rail Economic Corridor Zoning, incorporating exemplary public spaces, contemporary architecture and sustainable places within a green landscape setting."* (Page 269)

*"Policy EEP9: Promote enterprise and employment throughout the County, including along the Dublin Belfast Economic Corridor, the Metro and Rail Economic Corridor, Swords, Blanchardstown and Balbriggan and work with the other Local Authorities to promote Fingal and the wider mid-eastern region as an engine for economic growth."* (Page 267)

There is also a proposed Framework Plan in the Development Plan, "FP 11.B" for lands at Northwood, including the subject site. The following Policies and Objective are relevant to the proposed Framework Plan:

*"Policy CSP9: Prepare Framework Plans as required for identified areas to facilitate a co-ordinated approach to development."* (Page 61)

*"Policy CSP10: Prepare Framework Plans for areas designated on Development Plan maps in co-operation with relevant stakeholders, and actively secure the implementation of these plans and the achievement of the specific objectives indicated therein."* (Page 61)

*"Objective CSO12: Framework Plans will be subject to Strategic Environmental Assessments as appropriate and Screening for Appropriate Assessment."* (Page 61)

The Fingal Development Plan 2023-2029 notes that all applications for apartment developments will be assessed against the requirements of *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2020* (or any updated guidelines). Additionally, the Fingal Development Plan 2023-2029 provides specific guidance on a number of issues pertaining to the development of apartments, including *inter alia*:

- Communal Amenity Space;
- Communal Facilities;
- Security and Surveillance;
- Open Space; and
- Refuse storage.

## 4 ALTERNATIVES CONSIDERED

### 4.1 Introduction

This chapter of the EIAR sets out a description of the reasonable alternatives considered and contains information on the project site, design, size and other relevant features in order to establish the characteristics of the project for the purposes of environmental assessment.

Assessment of reasonable alternatives is mandatory under the EIA Directive. The requirement to consider alternatives within an EIAR is prescribed in Schedule 6 of the Planning Regulations, stating:

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

The presentation and consideration of various alternatives investigated by the project design team is an important requirement of the EIAR process. The Examination of Alternatives had particular regard to:

- ‘Do-Nothing’ Alternative;
- Alternative Locations;
- Alternative Layout;
- Alternative Designs;
- Alternative Processes; and
- Alternative Mitigation Measures.

#### 4.1.1 ‘Do-Nothing’ Alternative

No changes would be made to the current land-use practice if the proposed development were not to proceed. It is considered that the ‘Do-Nothing’ alternative would result in permanent, negative and slight impacts as the proposed development lands are zoned for development and are located within the Dublin metropolitan area.

#### 4.1.2 Alternative Locations

It is considered that the proposed development would result in permanent, positive and moderate impacts as the subject site is zoned for development.

#### 4.1.3 Alternative Layout

The site formed part of an overall site of 19.8 ha for which planning permission was granted in 2005 under Ref. F04A/1562 for a mixed-use development comprising modern business, enterprise and commercial facilities consisting of c. 77,016 sq.m. The appropriate period for this consent was extended to 2020 under Ref. F04A/1562/E2, which has lapsed.

Amendments to the parent permission were granted and implemented, but none compromised the overall masterplan layout as originally permitted. Changes included replacing 2 no. motor showrooms with a single-storey warehouse unit adjoining the other retail warehouse units, additional car parking, and a drive-thru takeaway restaurant to the rear (north) of the local centre. There was an increase in the permitted floor area of Blocks 5 and 6 (now referred to as Building No. 1 and Building No. 2 Swift Square Office Park) and additional car parking at the basement level. This planning permission, granted under Ref. F06A/1117 was implemented.

Completed elements of the masterplan include a retail park (Gulliver’s Retail Park), 2 no. of the 4 no. business units (Swift Square Office Park buildings 1 and 2) and the Local Centre.

Following the rezoning of the site with the adoption of the Fingal Development Plan 2011-2017, proposals for residential development within areas of the masterplan adjacent to the subject site have been permitted and constructed since 2015, including Bridgefield, Pappan Grove and Cedarview (Ref. F15A/0440), and

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Blackwood Square SHD (Ref. ABP-306075-19). In March 2023, An Bord Pleanála (ABP) granted permission for a SHD known as Whitehaven adjoining the subject site to the east. The proposed development will consist of constructing a residential development comprising 5 no. apartment blocks of 5-9 storeys containing 255 no. apartment units, shared residential services in a single storey between Blocks 2 and 3, and open spaces over a shared basement.

Figure 4-1 below illustrates the completed element of the masterplan and outlines the subject site (indicative redline).



Figure 4-1: Masterplan Constructed, Permitted & Proposed

Source: McCrossan O'Rourke Manning Architects

At present, the application site is an underutilised brownfield urban site used as a surface car parking area (254 no. car parking spaces) associated with Swift Square Park Office buildings to the south and additional temporary parking spaces facilitating construction workers at Blackwood Square (Ref. ABP-306075-19). The current use, therefore, creates a gap site located within a developing mixed-use community accommodating house, commercial, retail and healthcare, including Cedarview and Blackwood Square residential developments to the north and west, respectively, Swift Square Offices to the south, Gulliver's Retail Park and Gulliver's Local Centre to the west and northwest, and the Whitehaven site and Sports Surgery Clinic to the east.

Having considered the above-mentioned factors and given the clear demand for additional housing within Northwood as evidenced during the construction and occupation of apartments at Bridgefield, Pappan Grove and Cedarview (Ref. F15A/0440) and Blackwood Square (Ref. ABP-306075-19), the provision of residential units at the subject site is an appropriate land use.

4.1.4 Alternative Designs

Alternative designs and layouts for the proposed development were considered and discussed by the design team over a 12-month period up to the finalisation of the scheme. The scheme has undergone rigorous appraisal and a number of design iterations as part of the design development process.

The proposals for the subject site were the subject of detailed discussions with the Planning Authority prior to the principles of the finalised scheme being agreed. The proposed scheme addresses the input of FCC at pre-planning consultation meetings, and the formal LRD Meeting, which are appended to Volume 3 of this EIAR.

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The final design takes particular cognisance of the following LRD Opinion received from FCC (13<sup>th</sup> January 2023). The overall development parameters remain unchanged as part of the final proposal, e.g., the construction of 3 no. residential blocks and the relocation of existing surface car parking spaces catering for Swift Square Office Park personnel to the new basement/undercroft parking areas; however, the number of apartment units has been reduced from 198 to 192, and heights have changed along the northern elevation.

### 4.1.5 Alternative Processes

The management of processes that affect the volumes and characteristics of emissions, residues, traffic and the use of natural resources has formed part of the consideration of reasonable alternatives through the formulation of the project design. The construction works on the site will require the use of raw materials in the form of:

- energy to supply plant and machinery, and
- standard building materials including stone, metals, pipework, concrete, electrical, plumbing etc.

The use of these resources will be managed through the employment of best practice construction techniques including waste management practices.

Building efficiency during its operation is inherent to the design for the proposed development and is based on requirements of building regulations.

The processes to be employed during the construction and operation of the development and described in **Chapter 5** (Project Description) of Volume 2 of this EIAR, are standard best practice. There will be no novel processes or methods employed. Since the proposed processes represent standard best practice, alternative processes were not considered to be reasonable and were therefore not considered further in the EIA.

### 4.1.6 Alternative Mitigation Measures

Mitigation by avoidance has been a key aspect of the evolution of the proposed development throughout the design process. The site layout aims to make use of existing infrastructure. The mitigation measures outlined in the various chapters of Volume 2 of this EIAR are considered appropriate to the location, nature and extent of the proposed development. As such, no alternative mitigation measures were considered.

## 5 PROJECT DESCRIPTION

### 5.1 Introduction

The following sections present a summary of the information contained in **Chapter 5** (Project Description) of Volume 2 of the EIAR, which sets out a description of the proposed development. In accordance with Article 5(1)(a) of the 2011 Directive as amended by European Union (EU) Directive 2014/52/EU the description of the proposal should comprise “...information on the site, design, size and other relevant features of the project”.

### 5.2 Location of the Proposed Development

The proposed development is located on a site (c. 1.919 ha<sup>1</sup>) less than 1km northeast of Ballymun town centre within Northwood, some 6km to the north of Dublin’s city centre, c. 2.6km south of Dublin Airport (c. 4 km by road) and c. 700m southeast of the M50 Ballymun interchange. The proposed MetroLink Northwood Stop is located c. 450m to the west of the subject site. The location of the subject site and its surrounding context is illustrated in **Figure 5-1**.

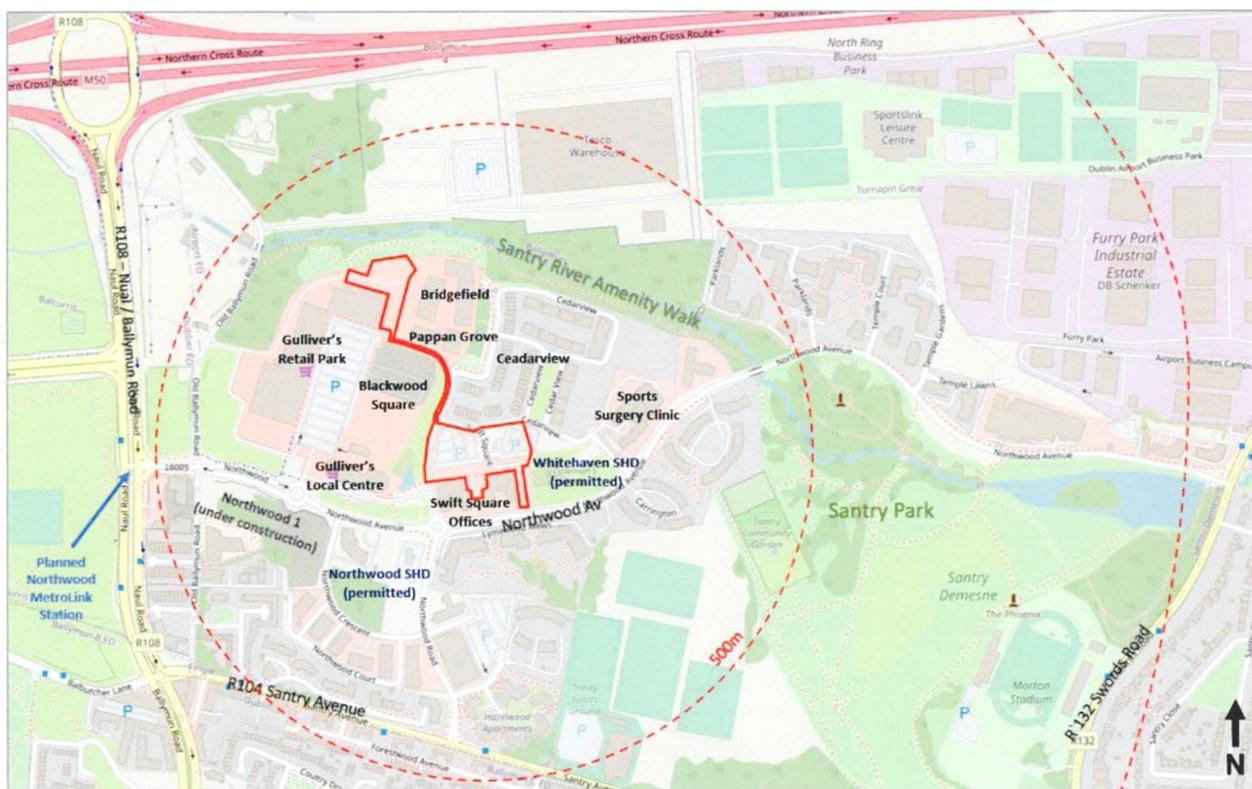


Figure 5-1: Site Location (indicative subject site outline in red)

Source: Open Street Map. Annotations by RPS

### 5.3 Adjacent Land Uses

The site and its adjacent lands have been subject to significant change over the last 15 years.

The applicant has developed Gulliver’s Retail Park, Gulliver’s Local Centre and part of Swift Square Office Park.

<sup>1</sup> Total subject site consists of 1.919 ha incl. temporary car parking area and construction access from Northwood Avenue to be removed on completion of the proposed works. The net site area is c 1.135 ha.

## EIAR VOLUME 1: Non-Technical Summary

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In more recent years, residential developments to the north and northwest (Bridgefield, Pappan Grove and Cedarview) and to the west Blackwood Square (Ref. ABP-306075-19) have been completed. Childcare facilities Little Harvard Santry Northwood and Little Harvard Blackwood operate from Bridgefield, Pappan Grove and Cedarview, and Blackwood Square, respectively.

Immediately east of the subject site, a development known as Whitehaven SHD, comprising of 5 no. apartment blocks containing 255 no. apartments units, has been recently permitted by An Bord Pleanála (ABP) (Ref. ABP-313317-22). The permitted development also includes the provision of a childcare facility capable of accommodating c. 70-75 no. children.

To the southwest of Swift Square Office Park, a development known as Northwood SHD, comprising of 2 no. apartment blocks with 268 no. build-to-rent apartments units and an office block, has been recently permitted by ABP (Ref. ABP-313179-22). The permitted development also includes the provision of a childcare facility capable of accommodating c. 50 no. children.

Further northeast of the subject site is the Sports Surgery Clinic, which has recently been extended, and TLC Centre Nursing Home beyond. South Northwood Avenue are Lymewood Mews apartments and the Alders and the Cedars apartments. Other sites along Northwood Avenue to the southwest are in various stages of construction. The Santry River Amenity Walk is located c. 260m to the north of the subject site, and Santry Park (a regional park) is located c. 270m to the south and east.

### 5.4 Existing Site

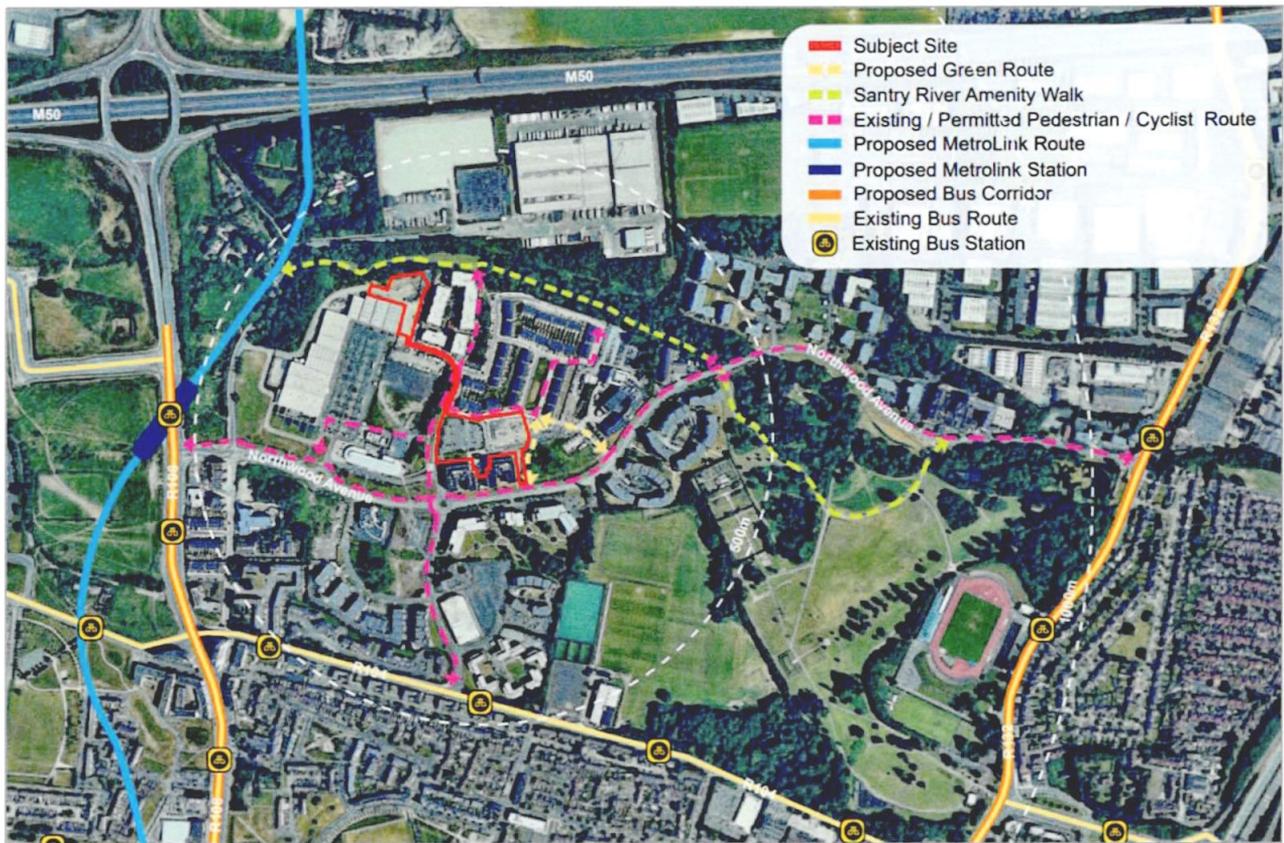
The subject site is currently used as a surface car parking area associated with the Swift Square Park Office (254<sup>2</sup> no. car parking spaces; see Drawing No. PL101.1) and temporary parking (24 no. parking spaces) facilitating construction workers at Blackwood Square (Ref. ABP-306075-19). The subject site is connected to Northwood Avenue by a local access road running along the north and west of the site.

#### 5.4.1 Existing Access

The main vehicular access to the subject site is currently provided off the existing local access road along the north of the site, which extends along the west until it connects to Northwood Avenue towards the south. The surrounding road network is indicated in **Figure 5-2**.

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<sup>2</sup> Details of the existing surface car parking area are shown in Dwg. No. PL101.1 prepared by the project's architect. 254 no. surface car parking spaces catering for the needs of Swift Square Office Park personnel are contained within the application site's boundary. In addition, there are 24 no. temporary car parking spaces which are only for temporary construction uses (construction needs from Blackwood Square development).



**Figure 5-2: Transport Infrastructure Context - Aerial View (indicative subject site outlined in red)**

Source: Google Maps, MetroLink.ie, BusConnects.ie, Greater Dublin Area Cycle Network Plan, RPS annotation.

There are good quality pedestrian walkways on all of the major roads locally, including dedicated pedestrian crossing facilities at the signalised junctions in the area. Along the length of Northwood Avenue, there are footpaths on both sides of the road.

Additionally, off-road cycle tracks are provided along the length of Northwood Avenue. The off-road cycle track along Northwood Avenue branches out at numerous locations along the route, providing additional cycle routes/facilities throughout Northwood.

As part of the Blackwood Square development (Ref. ABP-306075-19), a new link has been constructed between Swift Square Office Park, Blackwood Square and Gulliver’s Local Centre, providing a direct pedestrian route to the Ballymun Road (R108) bus stops and the future MetroLink Northwood Stop through the existing car park.

The subject site benefits from its proximity to a number of high-frequency bus services. Dublin Bus operates several routes located on the R108. Additionally, Dublin Bus and TFI operate numerous routes along Swords Road, Ballymun Road and Santry Avenue. These Dublin Bus operated services operate on a daily basis and offer relatively frequent schedules, as summarised in **Chapter 15** (Material Assets: Traffic and Transport) of Volume 2 of this EIAR.

The National Transport Authority is currently progressing with the BusConnects project. Improvements to the network will be provided by enhanced bus services with high-frequency spines and new local orbital and radial routes. There are two spines of relevance to the subject site, Spine E along the R108 Ballymun Road and Spine D along the R132 Swords Road. The orbital route (N6) came into operation recently along Santry Avenue.

In September 2022, Transport Infrastructure Ireland (TII) submitted a planning application (Railway order) to ABP (ABP-314724-22) for the rail line project known as MetroLink. MetroLink will be similar to the Luas in operation but will enjoy complete priority along its route, allowing for increased frequency of service with a tram expected every 2 minutes during peak periods. The planned Northwood MetroLink Station is c. 450m to the west of the subject site at the Northwood Avenue/R108 junction.

## 5.4.2 Services and Utilities

The existing 200mm watermain is located on the access road to the west of the proposed development. This 200mm watermain is supplied from the existing 600mm North Fringe Watermain located along Northwood Avenue. The North Fringe Watermain is a key trunk watermain laid along the North Fringe from Cappagh Cross to Baldoyle. It is supplied from the Leixlip Water Treatment Plant via the Ballycoolin Reservoir and the High Level Water Tower at Sillogue.

The existing 225mm foul sewer runs along the access road to the west of the proposed development. This sewer is connected to the North Fringe Sewer at the junction of the access road east of the site with Northwood Avenue. The North Fringe Sewer is a major trunk sewer that runs east from Ballymun / Santry to Baldoyle. At Baldoyle, the sewer is laid in a south-easterly direction to Sutton Pumping Station. The Sutton Pumping Station is connected via submarine pipeline to the Wastewater Treatment Plant at Ringsend.

The Ringsend Plant is currently being upgraded from a Population Equivalent (PE) of 1.6 Million to 2.4 million PE.

There are no electricity or gas connections on the subject site, but electricity and gas are available in the area.

Both Virgin and Eir have robust fibre networks in the area and adjacent to the site. There is also potential to use the Siro service, which is a joint utility provided by the Electricity Supply Board (ESB) and Vodafone as a broadband offering.

## 5.4.3 Cultural Heritage

There are no previously identified individual sites of archaeological interest located within the site of the proposed development.

There are no structures listed in the Record of Protected Structures (RPS) of the Fingal Development Plan 2023-2029 as being located within the subject site.

## 5.4.4 Trees and Hedgerow

The proposed development will result in the loss of all existing trees and associated vegetation.

The tree population associated with the main site is predominantly young, with a clear majority being less than 20 years old, with planting periods ranging from circa 2008 for the largest specimens through to circa 2019 for the smallest. None of the trees exceed 6.00m in height, and the majority being in the order of 4.50 to 5.00m.

While many of the trees associated with the site are in broadly good condition, some are not. This is particularly the case regarding the remnant of an earlier planting associated with the proposed temporary parking area to the north-west of the main site.

## 5.5 Proposed Site Layout

A site layout has been prepared by McCrossan O'Rourke Manning Architects for the subject site within the context of this part of Northwood. The site layout is illustrated in **Figure 5-3** and **Figure 5-4**. The layout has been designed with a vision to provide a high-quality residential development that promotes sustainability, a connected and legible movement network, as well as high-quality and usable public spaces that fully accord with the policies and objectives of the Fingal Development Plan.

Integral to the design is the creation of a sense of place and distinct character, which is achieved through the integration of existing remnant trees into the overall site layout while also providing permeability, connectivity, and legibility with adjoining uses. This portion of the overall lands developed by the applicant will connect into the existing and permitted hierarchy of pathways, public realm, residential zones, employment zones and recreational open spaces.





Figure 5-4: Site Plan – Main Site

Source: McCrossan O'Rourke Manning Architects (scaled version included with the application package)

### 5.5.1 Proposed Development

The proposed development will consist of site clearance and removal of all existing structures on site ancillary to the existing surface car parking and the construction of a residential development comprising 3 no. apartment blocks comprising 192 no. apartment units to include 4 no. 1-bedroom units and 188 no. 2-bedroom units, shared residential services (concierge, multifunction unit and gymnasium), and open amenity spaces over a basement.

The apartment blocks are to be constructed above a basement level and a partially shared podium structure (undercroft at ground-level), comprising:

- **Block 1**, ranging in height from 4-9 storeys, will contain **64** no. apartment units consisting of **1** no. 1-bedroom unit, **63** no. 2-bedroom units with a concierge space (c. 158.2 sq.m) at ground-floor level with associated communal open spaces at podium level;
- **Block 2**, ranging in height from 4-9 storeys, will contain **62** no. apartment units consisting of **2** no. 1-bedroom unit, **60** no. 2-bedroom units with a multifunction area (c. 167.8 sq.m) at ground-floor level with associated communal open spaces at podium level; and,
- 1. **Block 3**, ranging in height from 4-9 storeys, will contain **66** no. apartment units consisting of **1** no. 1-bedroom unit, **65** no. 2-bedroom with associated communal open spaces at podium level.
- The proposed development will also provide the following:
- 180 no. car parking spaces for residents, consisting of 146 no. spaces at the new basement level (incl. 1 no. disabled space) and 34 no. spaces at ground-floor level (undercroft) (incl. 1 no. disabled space);

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- 12 no. car parking spaces for visitors (incl. 1 no. disabled space and 2 no. car-sharing parking spaces at surface level);
- Relocation of permitted 254 no. car parking spaces catering for Swift Square Office Park personnel, consisting of 214 no. spaces at the new basement level (incl. 1 disabled space) and 40 no. spaces at ground-floor level (undercroft);
- 33 no. motorcycle parking spaces, including 28 no. spaces at the basement level and 5 no. spaces at ground-floor level (undercroft);
- 392 no. bicycle parking spaces for residents distributed across 4 no. secure cycle store areas at ground-level (undercroft), and 100 no. bicycle parking spaces for visitors at surface level;
- 30 no. sheltered bicycle parking spaces at street level for Swift Square Office Park personnel;
- a new vehicular access ramp to the new basement level;
- communal and public open spaces, including play areas;
- private open space to apartments in the form of terraces and balconies;
- an ancillary residential gymnasium space (c. 89.7 sq.m) at ground-floor level (undercroft) between Block 1 and Block 2;
- site clearance and removal of all existing structures on site ancillary to the existing surface car parking;
- provision of a temporary car parking area and, a construction access from Northwood Avenue to be removed on completion of the proposed works; and,
- all associated plant, drainage arrangements, works to facilitate utility connections, boundary treatment, landscaping, public lighting, refuse storage, vehicle, pedestrian and bicycle access, construction compounds and site development works.

The principal development statistics of the proposal are shown in **Table 5.1**.

**Table 5.1: Key Site Statistics**

Description	Detail
<b>General</b>	
Site Area (Red Line Boundary) <sup>3</sup>	1.919 ha
Net Site Area	1.135 ha
Overall Gross Floor Area (GFA)	19,959.70 sq.m.
Dual Aspect Units	70.83% (136 units)
Plot Ratio (Gross & Net)	1.04 (gross) and 1.76 (net)
Net Site Coverage	44.37% (including undercroft parking area)
Density (Gross & Net)	100 units per hectare (gross) and 169 units per hectare (net)
<b>Apartments (Combined)</b>	
1-bedroom unit	4 no.
2-bedroom unit	188 no.
<b>Total</b>	<b>192 no. apartment units</b>

<sup>3</sup> The total subject site (gross) consists of 1.919 ha incl. temporary car parking area and construction access to be removed on completion of the proposed works. The net site area is c 1.135 ha.

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Description	Detail
<b>Block 1</b>	
1-bedroom unit	1 no. (Area 61.8 sq.m)
2-bedroom unit	63 no. (Area 80.9 – 99.7 sq.m)
<b>Total</b>	<b>64 no. apartments in Block 1</b>
<b>Block 2</b>	
1-bedroom unit	2 no. (Area 64.3 – 65.1 sq.m)
2-bedroom unit	60 no. (Area 80.9 – 99.7 sq.m)
<b>Total</b>	<b>62 no. apartments in Block 2</b>
<b>Block 3</b>	
1-bedroom unit	1 no. (Area 64.3 sq.m)
2-bedroom unit	65 no. (Area 80.9 – 99.7 sq.m)
<b>Total</b>	<b>66 no. apartments in Block 3</b>
<b>Car Parking</b>	
Basement Level	146 no. for residents 214 no. for office users <b>Subtotal: 360 no. car parking spaces at Basement Level</b>
Ground-level undercroft	34 no. for residents 40 no. for office users <b>Subtotal: 74 no. car parking spaces at Undercroft (Ground-level)</b>
Surface Level	12 no. car parking spaces
<b>Total</b>	<b>446 no. car parking spaces</b>
<b>Motorcycle Parking Spaces</b>	
Basement Level	28 no.
Ground-level undercroft	5 no.
Surface Level	0 no.
<b>Total</b>	<b>33 no. motorcycle parking spaces</b>
<b>Bicycle Parking</b>	
Basement Level	0 no.
Ground-level undercroft	392 no. bicycle parking spaces for residents
Surface Level	100 no. bicycle parking spaces for residents and visitors
Office users	30 no. bicycle parking spaces for Swift Square Office Park personnel
<b>Total</b>	<b>522 no. bicycle parking spaces</b>
<b>Other Facilities</b>	

Description	Detail
Concierge	158.2 sq.m.
Multi-functional Area	167.8 sq.m
Gym	89.7 sq.m.
Public Open Space	3,369 sq.m
Communal Open Space	1,600 sq.m.
Car club / share spaces	2 no. spaces

Source: Architectural Design Statement and Housing Quality Assessment (LRD application documentation)

### 5.5.2 Nature of Materials and Building Elevational Treatments

A palette of durable and high-quality materials is proposed. This palette seeks to integrate with the materials used in the other residential developments by the applicant in Northwood (i.e., Cedarview, Blackwood Square and Whitehaven) adjoining the subject site. These materials will consist predominantly of selected bricks in 3 colours. Corner spandrel panel features are introduced to the taller and lower gables to reduce any perceived bulk in massing.

### 5.5.3 Proposed Open Spaces and Public Realm

The proposed development includes a hierarchy of open spaces comprising public open spaces, communal amenity spaces, and the public realm. The layout of these spaces is intended to enhance the urban design context of the neighbourhood and encourage a sense of community by providing a variety of outdoor uses to cater for all age groups and abilities.

Public open space (combined c. 3,369 sq.m; 29.67% of the gross site) is located along the south and west boundaries and includes various types of planting throughout the proposed development at street-level. The proposed public open spaces along the southern boundary consist of civic space (public plaza), a linear micro woodland and a pocket park. Public open spaces along the eastern boundary include large lawns and play areas, which will allow for active and passive recreation.

There are a large number of new trees proposed, and the species are chosen for their appropriateness to the scale of the scheme and are of varieties that will complement the tree planting in the local area. Planting will be predominantly native species to replace those being removed.

The proposed communal open spaces comprise c. 1,600 sq.m and consists of two separate landscaped courtyards situated between Block 1 and Block 2, and between Block 2 and Block 3, on a podium at the first-floor level. These spaces have been designed as semi-private open spaces for residents' use and are defined by the apartment blocks, which create a sense of enclosure and provide passive surveillance over the landscaped areas.

The proposed development will provide play areas for children of all ages within the scheme within the public and communal open spaces. The location of the play areas at the northeast corner of the site will allow for the integration with future play areas as part of the permitted residential scheme to the east of the application (Whitehaven SHD).

An enhanced public realm is created across the scheme, particularly at the north and west of the subject site. This includes the upgrade of the existing cycle/pedestrian path along the north eastern boundary of the site, the provision of a pedestrian route towards the south west corner of the site, where a public plaza is proposed, and the provision of landscaped buffer strips with ornamental shrub and tree planting which will add visual interest to the public realm and provide for a natural and high aesthetic transition from an apartment scheme form to a more low-to-medium housing type of housing development (i.e., Cedarview).

No areas are proposed to be taken in charge and will be managed by a management company.

## 5.5.4 Proposed Services and Utilities

The water needs of the development will be provided by mains water via the existing 200mm watermain in the local road from Northwood Avenue. Uisce Éireann (UÉ) (formerly Irish Water) has confirmed that water supply to the proposed development is feasible without upgrades.

The wastewater generated by the proposed development will be collected and piped to a public sewer via the existing 225mm diameter foul located in the access road. UÉ (formerly Irish Water), in their Confirmation of Feasibility Statement (reference CDS22005482), has confirmed that there is capacity in their wastewater infrastructure to cater for this development without upgrades. Further details are provided in **Chapter 16** (Material Assets: Built Services) of Volume 2 of this EIAR.

The proposed development will incorporate the construction of roofs and podiums, paved areas, internal roads and carparks, the runoff from which will be collected in a purpose-designed drainage system.

## 5.6 Construction Management Strategy

### 5.6.1 Phasing / Stages of Construction

The expected construction will be delivered in a single phase over c. 24 months. However, it is feasible that market conditions would require alterations to any programme which is specified at this time, and it is likely that it will be reviewed during construction.

An outline Construction Environmental Management Plan (CEMP) and draft Construction Management Plan (CMP) prepared by J.B. Barry & Partners Ltd. is enclosed with the application package, which outlines the proposed phasing programme. A final CEMP will be completed prior to the commencement of development.

### 5.6.2 Site Management

All construction activities will be governed by a Construction Traffic Management Plan (CTMP), the details of which will be agreed with FCC's Roads Department prior to the commencement of the Construction Phase.

Construction traffic will access the site from the existing access road to the west of the site between the development site and the adjacent Blackwood Square development and also via a proposed temporary site access off Northwood Avenue. A construction staff car park will be provided close to the site, in a designated area northeast of the adjacent Gulliver's Retail Park. This car park will also provide temporary parking for the existing Swift Office surface car parking, which needs to be relocated to facilitate construction works.

When the existing Swift Office basement car parking spaces have been transferred to its new temporary location (Figure 5-12) the existing vehicular ramp access to basement car park will then be removed. A new temporary ramp will be constructed to facilitate temporary access to the basement car park from Northwood Avenue.

The permitted site operation hours are expected to be 07:00-19:00 on weekdays and 09:00-13:00 on Saturdays, with no work on Sundays or bank/public holidays in accordance with the Environmental Noise Regulations 2006 and subject to final agreement with FCC.

A Construction Waste Management Plan (CWMP) has been prepared by J.B. Barry & Partners Ltd. and enclosed with the LRD application package. Management of all waste throughout the project lifecycle will be in accordance with EU, National and Regional waste management policy and the principles of the Waste Hierarchy, i.e., prevention, minimisation, reuse, recovery, and recycling.

## 6 BIODIVERSITY

### 6.1 Introduction

The following sections present a summary of the information contained in **Chapter 6** (Biodiversity) of Volume 2 of this EIAR, which describes the likely significant effects on biodiversity resulting from the proposed strategic housing development in Whitehaven, Santry. Where necessary, mitigation measures are identified to address likely significant effects, and the likely residual effects are also described.

The assessment takes account of international and national legislation relating to biodiversity and local authority policies relating to biodiversity. The assessment is based on the results of a desk study and field surveys undertaken in 2021 and 2023. The desk study included a search of datasets held by the National Parks and Wildlife Service (NPWS), the EPA, Bat Conservation Ireland (BCI), and the National Biodiversity Data Centre (NBDC). Field surveys included habitat and invasive species surveys, protected terrestrial mammal surveys, breeding bird surveys and bat surveys.

The lands are not contained within any designated sites but are indirectly hydrologically connected to European sites in Dublin Bay via the Santry River. These sites have been designated for their coastal and marine habitats and wetland bird species. It was concluded in the AA Screening report, included in this planning application, that there is no possibility of significant effects on European sites from the proposed development, either alone or in combination with any other plans and projects. With regards to nationally protected sites, Santry Demesne, a proposed National Heritage Area (pNHA), is located c. 180m north of the subject lands.

### 6.2 Baseline Assessment

#### 6.2.1 Flora

No notable or protected flora species occur within the subject lands. Habitats within the proposed development site considered to be key ecological receptors are woodlands (local importance), (hedgerows (local importance) and treelines (local importance).

#### 6.2.2 Fauna

In terms of protected fauna, no trees with potential roosting features for bats were recorded within the woodland or treeline habitats within the proposed development site. However, the woodland, treeline and hedgerow habitats are considered to be suitable for commuting and foraging bats, although existing light spill reduces the suitability of the subject lands for bats. Two species of bat - common pipistrelle *Pipistrellus pipistrellus* and soprano pipistrelle *Pipistrellus pygmaeus*, were recorded within the subject lands. No signs of other protected mammals were found within the lands. The lands were found to contain a range of breeding bird species, predominantly within and adjacent to woodland, treelines and hedgerow onsite.

### 6.3 Impact Assessment

Significant effects are predicted to arise at the construction phase of the proposed development from the removal of vegetation, potential generation and mobilisation of silts, sediments and other pollutants to the local surface water network. Disturbance impacts during construction are not predicted to be significant. Operational phase impacts are predicted from the operation of artificial lighting and disturbance from increased human traffic within the lands.

With regards to habitats, significant impacts are predicted during the construction phase of the proposed development. This would arise from the loss of woodland (c. 260m<sup>2</sup> of woodland), treelines (50 trees) and hedgerow (c. 21m of hedgerow) habitats during site clearance works, potential accidental damage to retained trees through machinery strikes or compaction of soils during construction works, and the indirect and accidental pollution of watercourses downstream of the lands.

With regards to fauna, significant effects are predicted to arise from loss of suitable habitat for bats and birds, and from mortality of birds arising from the destruction of bird nests during the construction phase of the proposed development. Operational phase impacts extend to the introduction of extra artificial lighting to the lands, and the illumination of suitable habitat for commuting and foraging bats.