

- 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

## 1.9 Contributors to the EIAR

This EIAR was project managed, coordinated and produced by RPS Group Ltd (RPS), who liaised between the design team and various environmental specialist consultants. RPS was also responsible for editing the EIAR document to ensure that it was cohesive and not a disjointed collection of disparate reports by various environmental specialists. RPS does not accept responsibility for the input of specialist consultants or the design team.

The EIAR structure, responsibility and qualified input for each chapter are detailed in **Table 1.5**.

**Table 1.5: List of Contributors to EIAR Chapters**

Chp	Lead Author(s)	Company	Subject	Qualifications and Accreditation
1	Helena Gavin	RPS Group Ltd	Introduction	BA, MSc Town & Country Planning, PG Dip Env Eng, MIPI.
2	Helena Gavin	RPS Group Ltd	Consultation and Project Scoping	BA, MSc Town & Country Planning, PG Dip Env Eng, MIPI.
3	Helena Gavin	RPS Group Ltd	Planning Policy Context	BA, MSc Town & Country Planning, PG Dip Env Eng, MIPI.
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Chp	Lead Author(s)	Company	Subject	Qualifications and Accreditation
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11	Dr. Cristina Paduano	B-Fluid	Microclimate: Wind	PhD Mechanical Engineering, M.Eng and B.Eng in Aerospace Engineering
12	Alistair Maclaurin	AWN Consulting	Noise and Vibration	BSc PgDip MIOA
13	Martin Byrne	Byrne Mullins & Assoc.	Cultural Heritage	MA, Dip. EIA Mgmt, MIAI
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15	Kwok Chuen Lam	J.B. Barry & Partners Ltd	Material Assets: Traffic and Transport	BSc, CEng, MIEI.
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18	Niamh Nolan	AWN Consulting	Climate	BSocSci (Hons) in Social Policy and Geography
19	Carlos Lara Gonzalez	RPS Group Ltd	Cumulative Effects and Environmental Interactions	BSc in Spatial Planning, HDip in Project Management, MIPI
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## 1.10 Technical Difficulties or Deficiencies in Knowledge Encountered

No technical difficulties were encountered when preparing this report. Discipline-specific data limitations are identified within each chapter as relevant.

Relevant information was obtained from publicly available sources and mapping databases such as the Environmental Protection Agency (EPA), National Parks and Wildlife Service (NPWS), Geological Survey of Ireland (GSI), Office of Public Works (OPW), etc. It has been assumed that the information is correct, and while reasonable care and skill have been applied in the review of this data, no responsibility can be accepted for inaccuracies in the data supplied.

In addition to published datasets, the preparation of the EIAR has drawn on other data sets undertaken to inform this EIAR as detailed in individual chapters of the EIAR.

These additional survey works have been undertaken in order to provide up-to-date baseline information on which to undertake the environmental assessments, in addition to the site-specific information from the existing databases from official sources.

## 1.11 Viewing of 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 the offices of FCC as set out in the planning application statutory notices.

## 2 CONSULTATION AND PROJECT SCOPING

### 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.

Three pre-application meetings took place with FCC with respect to the proposed development:

1. Meeting on 02<sup>nd</sup> September 2021
2. Meeting on 24<sup>th</sup> June 2022
3. Meeting on 01<sup>st</sup> September 2022

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.

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 request was made on 09<sup>th</sup> November 2022 in accordance with the provisions of Section 32B and 16A of the *Planning and Development Act 2000* (as amended). On 09<sup>th</sup> December 2022, an LRD Meeting (Stage 2) was held between the Applicant, representatives of its design team and FCC.

A copy of the LRD Meeting record is included in **Appendix 2.2** of Volume 3 of this EIAR, together with the LRD Opinion. The LRD Opinion concluded that:

*“(...) it is the opinion that the documentation submitted within the consultation request under Section 32B of the Act constitutes a reasonable basis on which to make an application for permission for the proposed Large-scale Residential Development”*

### 2.2 Scoping of the Project

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 (IAA);
- Dublin Airport Authority (DAA);
- Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media;
- Department of Environment, Climate and Communications (DECC);
- Department of the Housing, Local Government and Heritage;
- Transport Infrastructure Ireland (TII);
- National Transport Authority (NTA);
- 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. **Table 2.1** presents the summary of the consultation responses received. All comments and recommendations from each of the consultees have been taken into consideration in this EIAR.

**Table 2.1: Summary of Responses**

Consultee	Key issues / concerns / recommendations raised in Response	Where addressed in the EIAR
Department of Environment, Climate and Communications	<p><i>Geological Survey Ireland Division</i></p> <ul style="list-style-type: none"> <li>• Recommend use of their data and mapping viewers to identify and ensure that natural resources used in the proposed development are sustainably sourced; from properly recognised and licensed facilities, and that consideration of future resource sterilization is considered.</li> <li>• Recommend referring to: “<i>Institute of Geologists of Ireland, 2013. Guidelines for the Preparation of the Soils, Geology and Hydrogeology Chapters of Geology in Environmental Impact Statements.</i>”</li> </ul> <p><i>Environment Protection Division</i></p> <ul style="list-style-type: none"> <li>• Regarding waste, DECC recommends Local Authority would consult directly with their respective Regional Waste Management Planning Office regarding development of the final plans Local Authority would consult directly with their respective Regional Waste Management Planning Office regarding development of the final plans.</li> </ul>	Chapter 7
TII	<ul style="list-style-type: none"> <li>• Recommend identifying the methods/techniques proposed for any works traversing/in proximity to the national road network to demonstrate that the development can proceed complementary to safeguarding the capacity, safety and operational efficiency of that network.</li> <li>• Recommend a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting construction and operational traffic volumes attending the site and traffic routes to/from the site, with reference to impacts on the national road network and junctions of lower category roads with national roads.</li> <li>• All TII Standards should be consulted to determine the requirement for Road Safety Audit (RSA) and Road Safety Impact Assessment (RSIA).</li> <li>• Recommend provision for travel planning / mobility management planning in the interests of protecting national roads capacity and of sustainable travel policy.</li> <li>• Recommend referring to the following guidelines: <ul style="list-style-type: none"> <li>– <i>TII’s Environmental Assessment and Construction Guidelines, including the “Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes” (National Roads Authority (NRA), 2006),</i></li> <li>– <i>The “Environmental Noise Regulations 2006” (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see “Guidelines for the Treatment of Noise and Vibration in National Road Schemes” (1<sup>st</sup> Rev., NRA, 2004)).</i></li> <li>– <i>TII’s “Traffic and Transport Assessment Guidelines” (2014)</i></li> </ul> </li> </ul>	Chapter 15 Material Assets: Traffic and Transport

Consultee	Key issues / concerns / recommendations raised in Response	Where addressed in the EIAR
FCC (Roads, Drainage, Environment Depts)	<ul style="list-style-type: none"> <li>No response / acknowledgement only</li> </ul>	NA
Fingal County Childcare Committee	<ul style="list-style-type: none"> <li>No response / acknowledgement only</li> </ul>	NA
Irish Aviation Authority	<ul style="list-style-type: none"> <li>Recommend the developers engage as early as possible with Dublin airport and the IAA's Air Navigation Service Provider (ANSP) to undertake a preliminary screening assessment to confirm that the proposed business and logistics park and the associated cranes that would be utilised during its construction would have no impact on instrument flight procedures at Dublin Airport.</li> </ul>	Chapter 16 Material Assets: Built Services;
DAA	<ul style="list-style-type: none"> <li>DAA requests the developer to agree any proposals for crane operations in advance of construction with DAA and with the Irish Aviation Authority.</li> <li>Recommend that no structure on site should exceed 112m above Ordnance Survey Datum (including any rooftop development) as the area is within the Obstacle Limitation Surface for Dunlin Airport.</li> <li>As the site is within Dublin Airport Noise Zone D, DAA acknowledge any noise sensitive uses proposed on the site may require noise insulation to ensure appropriate internal noise levels of habitable rooms.</li> <li>DAA recommend any solar photovoltaic (PV) panels should not adversely affect the safety of aircraft at Dublin Airport.</li> <li>If the proposed development includes SuDS measures which have the potential to act as a wildlife attractant, the applicant is required to adhere to the recommended principles contained within the DAA SuDS policy document and consult with DAA prior to construction to ensure aerodrome safety risks have been considered and bird hazards have been suitably mitigated.</li> </ul>	Chapter 16 Material Assets: Built Services; Chapter 12: Noise and Vibration; Chapter 6: Biodiversity.
Department of Tourism, Culture, Arts, Gaeltacht and Sport	<ul style="list-style-type: none"> <li>No response / acknowledgement only</li> </ul>	NA
Department of Environment, Climate and Communications	<ul style="list-style-type: none"> <li>No response / acknowledgement only</li> </ul>	NA
Department of the Housing, Planning, Community and Local Government	<ul style="list-style-type: none"> <li>No response / acknowledgement only</li> </ul>	NA
NTA	<ul style="list-style-type: none"> <li>No response / acknowledgement only</li> </ul>	NA
Inland Fisheries Ireland	<ul style="list-style-type: none"> <li>Recommend maximising an undisturbed buffer zone between development area and riverbank</li> <li>Recommend including an Invasive Species and Biosecurity Plan</li> <li>Refer to IPI "Guidelines on protection of fisheries during construction works in and adjacent to waters" (2016)</li> </ul>	Chapter 6 Biodiversity
An Taisce	<ul style="list-style-type: none"> <li>No response / acknowledgement only</li> </ul>	NA
Fáilte Ireland	<ul style="list-style-type: none"> <li>No response / acknowledgement only</li> </ul>	NA
The Heritage Council	<ul style="list-style-type: none"> <li>No response / acknowledgement only</li> </ul>	NA
ESB Networks	<ul style="list-style-type: none"> <li>No response / acknowledgement only</li> </ul>	NA
National Monuments Service	<ul style="list-style-type: none"> <li>No response / acknowledgement only</li> </ul>	NA
Uisce Eireann	<ul style="list-style-type: none"> <li>No response / acknowledgement only</li> </ul>	NA

In some instances while responses were not received during the scoping exercise specialists did consult with some of these organisations, including Uisce Éireann (UÉ) (formerly Irish Water) and FCC in the execution of their assessments. Where relevant this is further detailed within the specialist chapters.

### 3 PLANNING POLICY CONTEXT

#### 3.1 Contributor to the Chapter

This chapter of the EIAR sets out the national, regional, and local land use, transport planning and development policy, which guides the development of the subject site. Helena Gavin of RPS Group Ltd prepared this chapter (see **Section 1.9 of Chapter 1** (Introduction) of Volume 2 of this EIAR for details of experience and qualifications).

#### 3.2 Introduction

This chapter of the EIAR sets out EU, national, regional and local land use and transport planning and development policy, which guides the proposed development. The relevant planning policies are set out for each level within the hierarchy in the sections that follow. **Figure 3-1** illustrates an overview of the Irish Planning System and the importance of policy in the assessment of planning applications.

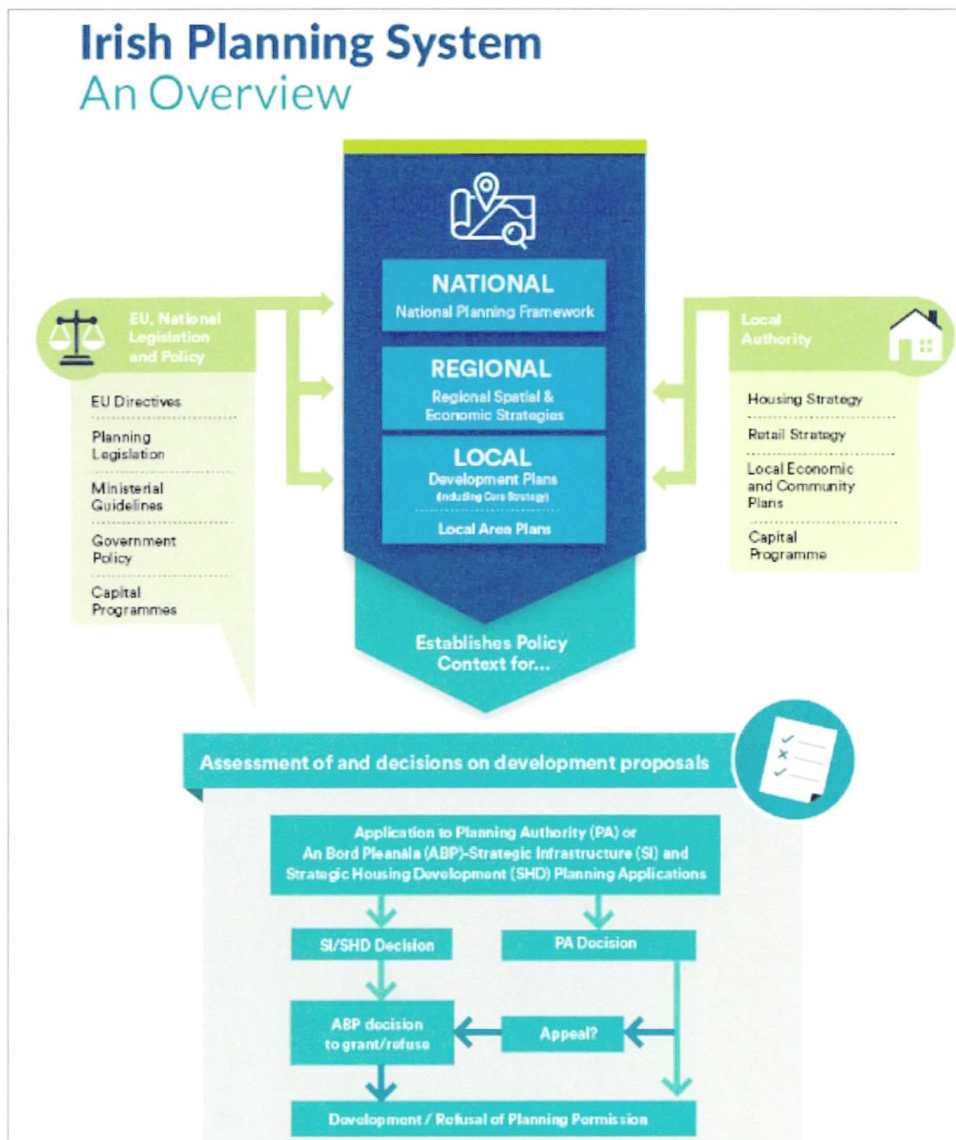


Figure 3-1: National Planning Policy

Source: NPF

### 3.3 Relevant National Planning Policy and Guidance

#### 3.3.1 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.

#### 3.3.2 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.



### 3.3.3 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.

### 3.3.4 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.

### 3.3.5 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.

### 3.3.6 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 800-1000m) 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 400-500m) 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 Development Plan 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

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

In March 2013, the Department of Transport, Tourism and Sport (DTTAS) and the Department of the Environment, Community and Local Government (DECLG) jointly published the *Design Manual for Urban Roads and Streets* (DMURS), a new guidance document 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 6km/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. To achieve the balanced approach to street design promoted in DMURS, four key design principles have been set out: connected networks, multi-functional streets, a pedestrian focus, and a multi-disciplinary approach.

### 3.3.8 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 (SPPR) 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”.

### 3.3.9 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).

### 3.3.10 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 Environment, Heritage, and Local Government (DEHLG). 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 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 Flood Risk 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)

### 3.3.11 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 according to Part V legislation. The Part V

Guidelines were updated in 2021 under Section 96 (3) (a) to increase the social housing requirement for all new residential development to 20% of the total number of proposed units.

### 3.3.12 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.

### 3.3.13 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).

## 3.4 Relevant Regional Planning Strategy and Policy

### 3.4.1 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 (RPGs) 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.

### 3.4.2 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 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)

## 3.5 Relevant Local Planning Strategy and Policy

### 3.5.1 Fingal Development Plan 2023-2029

The local planning policy framework is set out in the *Fingal Development Plan 2023–2029* (the Fingal Development Plan). 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 Fingal Development 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 Development Plan 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, 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 3-2: 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 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 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.

### 3.6 References

- Delivering Homes, Sustaining Communities (2008): <https://www.opr.ie/wp-content/uploads/2019/08/2007-Delivering-Homes-Sustaining-Communities-Hsing-Policy-1.pdf>
- Design Manual for Urban Roads and Streets 2013: <https://www.gov.ie/en/publication/3360b1-design-manual-for-urban-roads-and-streets/>
- Fingal Development Plan 2023-2029: <https://www.fingal.ie/sites/default/files/2023-04/Fingal%20Development%20Plan%202023-2029%20Interim%20Publication.pdf>
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009: <https://www.gov.ie/en/publication/a9965-sustainable-residential-developments-in-urban-areas-guidelines-for-planning-authorities/>
- Housing for All - a New Housing Plan for Ireland: <https://www.gov.ie/en/publication/ef5ec-housing-for-all-a-new-housing-plan-for-ireland/>
- Part V of the Planning and Development Act 2000 Guidelines issued by the Minister for Housing, Planning, Community and Local Government - <https://www.gov.ie/en/publication/19046-part-v-of-the-planning-and-development-act-2000-guidelines-issued-by-the-minister-for-housing-planning-community-and-local-government-under-section-28-of-the-planning-and-development-act-2000/>
- Project Ireland 2040 National Planning Framework: <http://npf.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf>
- Quality Housing for Sustainable Communities (2008): <https://www.opr.ie/wp-content/uploads/2019/08/2007-Quality-Hsing-for-Sustainable-Communities-1.pdf>
- Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2018: <https://www.gov.ie/en/publication/15f0b-design-standards-for-new-apartments-dsfna-2018/>
- The Childcare Facilities – Guidelines for Planning Authorities (Childcare Guidelines): <https://www.gov.ie/en/publication/c8b38-childcare-facilities-guidelines/>
- The Planning System and Flood Risk Management Guidelines 2009: <https://www.gov.ie/en/publication/7db50-the-planning-system-and-flood-risk-management-guidelines-for-planning-authorities-nov-09/>
- The Regional Spatial and Economic Strategy for the Eastern and Midland Region: <https://emra.ie/final-rses/>
- The Transport Strategy for the Greater Dublin Area 2022 to 2042: <https://www.nationaltransport.ie/wp-content/uploads/2023/01/Greater-Dublin-Area-Transport-Strategy-2022-42-1.pdf>
- Urban Design Manual A best practice guide: <https://www.gov.ie/en/publication/5d1a7-best-practice-urban-design-manual-may-2009-part-1/>
- Urban Development and Building Height Guidelines for Planning Authorities: <https://www.gov.ie/en/publication/93d22-urban-development-and-building-height-guidelines-ud-bhg-2018/>

## 4 ALTERNATIVES CONSIDERED

### 4.1 Introduction

Assessment of reasonable alternatives is mandatory under the EIA Directive. Reasonable alternatives may include project design proposals, location, size and scale relevant to the proposed development and its specific characteristics.

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.”*

### 4.2 Methodology

The detailed assessment of alternatives was undertaken in accordance with the following guidance documents:

- *Environmental Impact Assessment of Projects Guidance on the Preparation of the Environmental Impact Assessment Report* (Directive 2011/92/EU as amended by 2014 /52/EU);
- *Advice notes on Current Practice* (in the preparation of Environmental Impact Statements) (EPA, 2015);
- *Guidelines on the information to be contained in Environmental Impact Assessment Reports* (EPA, 2022); and,
- *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment* (Department of Housing, Planning and Local Government, 2018).

This chapter describes the main alternatives examined during the design phase and identifies the reasons for choosing the development as proposed. Alternatives considered have been considered at four levels:

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

### 4.3 ‘Do-Nothing’ Alternative

No changes would be made to the current land-use practice if the proposed development were not to proceed. The site would continue to be a surface car park and the environmental impact of this outcome is considered negative. The potential for additional housing and employment in the area in relation to the construction and operation of the proposed development would be lost. 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.

### 4.4 Alternative Locations

The site is zoned for development. The proposed land uses are compliant with the zoning objective for the site as set out under the Fingal Development Plan 2023-2029. It is considered that the proposed development would result in permanent, positive and moderate impacts as the subject site is zoned for development.



## 4.5 Alternative Layouts

The application site was the subject of Variation No. 26 of the Fingal Development Plan in December 2002. It was rezoned from land use zoning “E” (i.e., general industrial employment) to “ST,” with an objective “to facilitate opportunities for science and technology based employment in a high quality landscaped environment in established science and technology parks.”

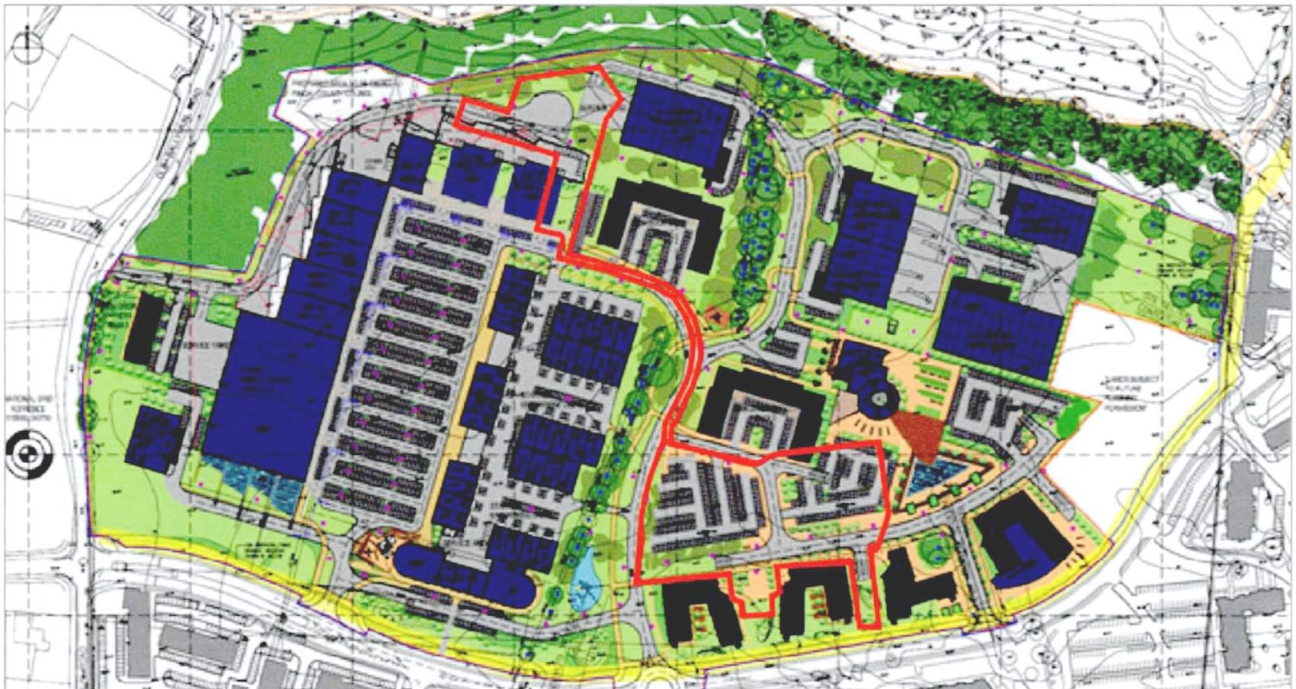
The site formed part of an overall site of 19.8 hectares for which planning permission was granted in 2005 under Ref. F04A/1562 for a mixed-use development comprising modern business, enterprise and commercial facilities consisting of c. 77,016 sq.m. This development was subject to EIA. Details of the permitted masterplan for the overall site are discussed below.

The permitted masterplan for the overall site consisted of the following:

- 7 no. retail warehouses (10,500 sq.m) and 3 no. motor showrooms on the western side of the site.
- 3 no. blocks of 38 no. 3-storey office units (11,172 sq.m) and 35 no. 2-storey starter enterprise units (12,250 sq.m) at the centre of the site.
- 4 no. 5-storey business units (25,030 sq.m) fronting onto Northwood Avenue in the southeast corner of the site – 2 no. of which were located on the application site.
- 5 no. logistic warehouses (11,126 sq.m) on the northern side of the site.
- 1 no. local retail centre (1,670 sq.m) and a single-storey amenity building (1,700 sq.m).

The appropriate period for this consent was extended to 2020 under Ref. F04A/1562/E2, which has lapsed. This masterplan is illustrated in **Figure 4-1** below.

The application site for the proposed development is outlined in red, where surface car parking areas associated with the adjoining commercial office blocks were permitted.



**Figure 4-1: Permitted Masterplan Ref. F04A/1562 (indicative subject site outlined in red)**

Source: Cosgrave Developments

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. **Figure 4-2** below illustrates the completed element of the masterplan and outlines the subject site (indicative redline).



**Figure 4-2: Masterplan of Constructed**

Source: FCC Online Planning Search

With the adoption of the Fingal Development Plan 2011-2017, the subject site was zoned “ME”. After examining the new land use zoning objective, existing and proposed infrastructure to serve the Northwood area and the surrounding land uses in addition to those permitted, the Applicant proposed introducing residential into the use mix of the masterplan lands.

Proposals for residential development within areas of the masterplan adjacent to the subject site have been assessed and permitted since 2015. The sections below summarise the relevant residential proposals permitted and/or constructed within the original masterplan area.

- **Bridgefield, Pappan Grove and Cedarview (Ref. F15A/0440)**

Planning permission was granted under Ref. F15A/0440, which modified F04A/1562 and permitted the replacement of 5 no. logistic warehouses (11,126 sq.m), 23 no. 3 storey own door office buildings (9,696 sq.m), 1 no. amenity building (1,700 sq.m) and associated car parking with 374 no. residential units and reorganised parking associated with the permitted business units on a c. 7.0 ha site. Since this planning permission, minor modifications have been granted, resulting in 355 no. units now permitted. All these units (Bridgefield, Pappan Grove and Cedarview) have been constructed and are occupied.

- **Blackwood Square SHD (Ref. ABP-306075-19)**

In March 2020, ABP granted permission for a Blackwood Square SHD comprising 4 no. 8-storey apartment blocks consisting of 329 apartment units, shared residential services, a childcare facility and 5 no. retail units. In April 2021, the terms of conditions attached were altered under case Ref. ABP-309416-21, resulting in the number of apartments increasing to 330 no. units and a childcare facility to accommodate a minimum of 62 childcare places. Temporary car parking associated with the construction of Blackwood Square is located on the subject site. The development is completed, the childcare facility is open and units are largely occupied.

- **Whitehaven SHD (Ref. ABP-313317-22)**

In March 2023, 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. The permitted development also includes providing a childcare facility capable of accommodating c. 70-75 no. children.

Figure 4-3 below illustrates the completed element of the masterplan and outlines the subject site (indicative redline).



**Figure 4-3: Masterplan Constructed, Permitted & Proposed**

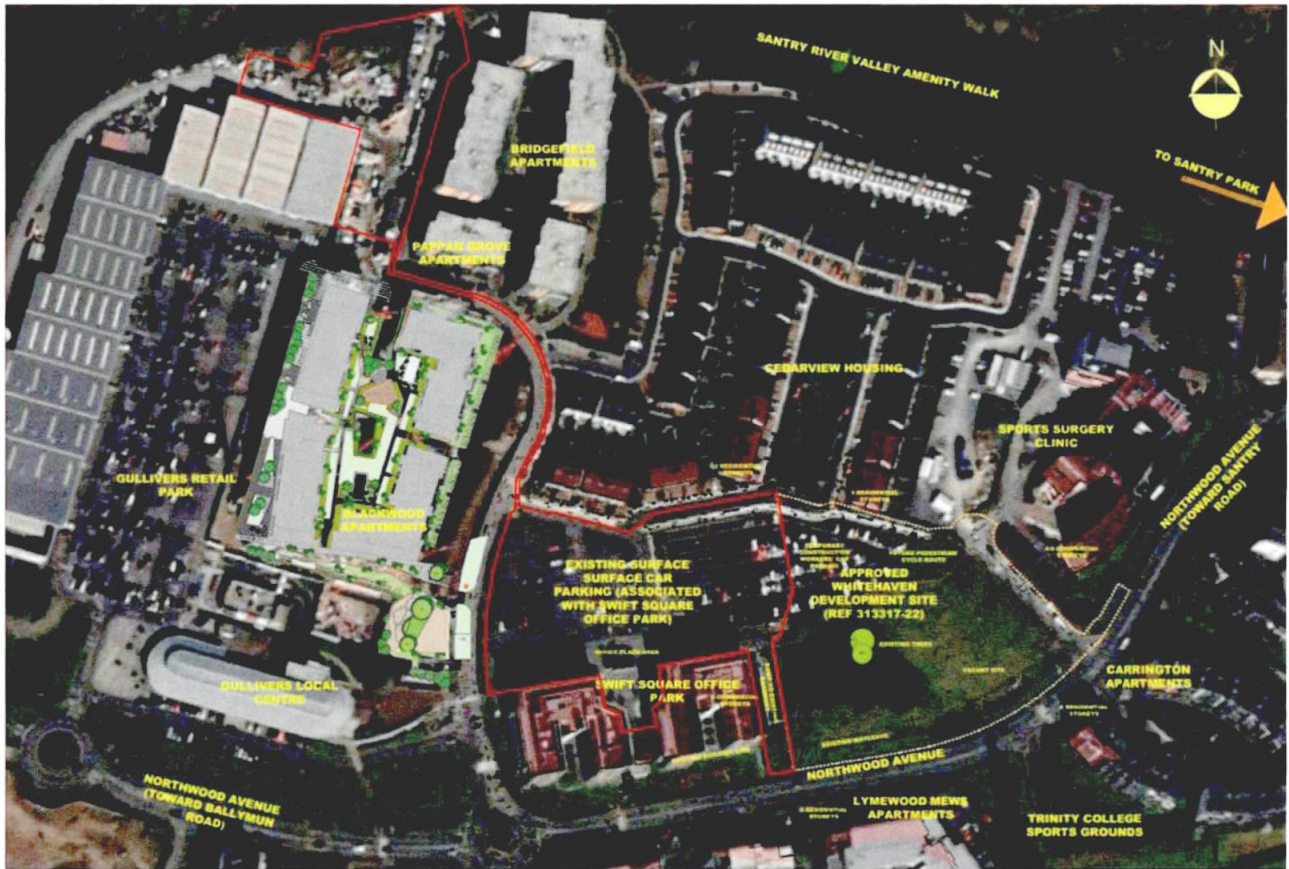
Source: McCrossan O'Rourke Manning Architects

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).

As outlined in **Chapter 3** (Planning Policy Context) of Volume 2 of this EIAR, the site is subject to the land use zoning objective “MRE” (see **Figure 3-1**) - Metro and Rail Economic Corridor under the Fingal Development Plan 2023-2029, with an objective 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).

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.

Figure 4-4 shows the current developments near the subject site.



**Figure 4-4: Developed and Under Construction 2023**

Source: McCrossan O'Rourke Manning Architects

The National Planning Framework (NPF) seeks to direct development to existing settlements rather than allowing cities' and towns' continual expansion and sprawl. The preferred approach to planning the future spatial strategy is promoting compact development that focuses on reusing previously developed "brownfield" land, building up infill sites that may not have been built on before, and either reusing or redeveloping existing sites and buildings.

Furthermore, at a metropolitan scale, the NPF seeks to focus on a number of large regeneration and redevelopment projects, particularly regarding underutilised land within the canals and the M50 ring and a more compact urban form facilitated through well-designed, higher-density development. In this respect, the subject site is an underutilised urban site strategically located within the M50, easily accessed via the Ballymun Road (R108), Santry Avenue (R104), Swords Road (R132), and the M50, on land zoned to accommodate residential uses close to a good range of supporting services within Santry and Ballymun, including schools, community facilities, local services, and retail uses.

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.

The development of the subject site will redevelop a currently underutilised brownfield site, fill the existing gap in the masterplan area and complete existing and proposed uses on the area while delivering on the land use zoning objective set for these lands.

The final layout of the proposed development has been assessed and is reported upon within the chapters of this EIAR.

## 4.6 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.

In this regard, the scheme has undergone rigorous appraisal and a number of design iterations as part of the design development process. The potential environmental issues and effects that informed this consideration related to the character of the area, landscape, visual impact, daylight and sunlight impacts, and potential impacts on the amenities of established properties and uses in the area.

These considerations have informed the consideration of alternative layouts, separation distances, building heights, and open space arrangements.

Whilst design has been an ongoing iterative process, described below are discrete stages in this process, in line with pre-planning consultation meetings held to date.

#### 4.6.1 Initial and Pre-consultation Design

The initial design concept provided for a residential scheme, including relocating existing surface car parking spaces associated with Swift Square Office Park buildings to new basement/undercroft car parking areas and constructing 3 no. blocks comprising 203 no. units (including 1, 2 and 3 bedrooms) of generally 5 storeys along the north boundary and 9 storeys to the south.

The proposal also included the provision of open spaces in the form of communal courtyards separating the residential blocks and public areas to the east and south of the proposed blocks. Other uses proposed include a concierge, multifunctional room and gym as part of services ancillary to the residential units.

Following initial pre-planning consultations with FCC (see Section 2.1 of **Chapter 2**), the design was further refined due to key issues and recommendations issued by FCC. A copy of the pre-consultations record is included in **Appendix 2.1** of Volume 3 of this EIAR.

The proposed number of units was reduced from 203 to 198, and the site layout and elevations were further refined. **Figures 4-5** and **4-6** below show details of the proposal submitted to FCC in advance of the pre-planning consultation meeting held on 24<sup>th</sup> June 2022. During the pre-planning meeting on 24<sup>th</sup> June 2022, the Applicant was asked to consider the following aspects of the design:

- To examine materials and finishes to break the mass of the scale,
- To examine the orientation of balconies along the northern elevation,
- To further consider the separation distance from existing Cedarview houses,
- To further examine elevations along the southern boundary,
- To explore further landscape measures along the northern boundary,
- To consider green roofs as part of surface water drainage; and
- To examine bicycle parking access arrangements to the basement level and the provision of car parking.

FCC concluded that a further meeting was required to address and clarify the issues raised and summarised above before a formal LRD meeting (Stage 2).



Figure 4-5: Proposed Site Layout (submitted to FCC on 03<sup>rd</sup> June 2022 and discussed on 24<sup>th</sup> June 2022)

Source: McCrossan O'Rourke Manning Architects



Figure 4-6: Proposed Elevations (submitted to FCC on 03<sup>rd</sup> June 2022 and discussed on 24<sup>th</sup> June 2022)

Source: McCrossan O'Rourke Manning Architects

With regard for the above, the proposal's design was amended, and refinements were introduced. Details of the revisions were submitted to FCC on 15<sup>th</sup> August 2022, before the pre-planning meeting held on 01<sup>st</sup> September 2022. A copy of the record is included in **Appendix 2.1** of Volume 3 of this EIAR. Overall refinements included, *inter alia*:

- A combination of buff, red, and blue brick and stone detailing was introduced to address the scale and mass.
- The north-facing balconies were omitted and relocated to the western façade of the block.
- The elevations to the northern gables were redesigned to reduce perceived visual impact or overlooking of Cedarview.
- The elevations to all three southern gables of the apartments were redesigned to introduce more visual interest;
- Landscape measures were provided along the northern boundary to provide screening between the proposed blocks and existing Cedarview houses.
- Surface water drainage, green roofs, and attenuation tank calculations would all be addressed as part of the application documentation;
- The bicycle parking spaces proposed to serve the development were now to be located at the ground floor level, and details of the car parking provision were clarified.

**Figures 4-7 and 4-8** show a comparison of earlier heights and proposed modifications that increase visual appeal while decreasing the scale and bulk of the blocks.



**Figure 4-7: Proposed Northern Elevations – Comparison with the previous proposal (submitted to FCC on 15<sup>th</sup> August 2022 and discussed on 01<sup>st</sup> September 2022)**

Source: McCrossan O'Rourke Manning Architects



**Figure 4-8: Proposed Southern Elevations – Comparison with the previous proposal (submitted to FCC on 15<sup>th</sup> August 2022 and discussed on 01<sup>st</sup> September 2022)**

Source: McCrossan O'Rourke Manning Architects

Following the pre-consultation meeting held on 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 (formal LRD Meeting Request), considering the recommendations provided. A copy of the record is included in **Appendix 2.1** of Volume 3 of this EIAR.

#### 4.6.2 LRD Meeting Request Design

Feedback from the pre-application consultation meetings with FCC and more detailed consideration led to the design being refined before making a formal LRD Meeting Request to enable better integration with the receiving environment.

The revisions included, *inter alia*, changes to elevations along the northern boundary to moderate the massing, including reducing the proposed height of Block 2 to 4-storeys (previously 5-storeys), refinements to materials, and changes to window fenestration to add further variety and visual interest. Further to this, increased heights (from 5 to 6-storeys) were introduced at the northern elevation of Block 1, in order to create a variety in building height and reinforce the streetscape along the access road to the west, having due regard to its proximity to Northwood Avenue and enhanced separation distances from existing buildings further west.

**Figure 4-9** show the specific adjustments made to meet FCC's massing and height concerns along the northern elevations. Refinements demonstrate the iterative process used to design the blocks and shows how the Applicant and its design team considered FCC's feedback throughout the pre-planning consultations before submitting an LRD Meeting request.





**Figure 4-9: Proposed Southern Elevations – Comparison with previous proposals (submitted to FCC on 09<sup>th</sup> November 2022)**

Source: McCrossan O'Rourke Manning Architects

A copy of the LRD Meeting record, together with the LRD Opinion, is included in **Appendix 2.2** of Volume 3 of this EIAR. The LRD Opinion concluded that the proposal constitutes a reasonable basis on which to make an application for permission for a proposed Large-scale Residential Development.

### 4.6.3 Final Design

The final design takes particular cognisance of the following LRD Opinion received from FCC (13<sup>th</sup> January 2023). The final site layout, as proposed, is shown in **Figure 4-10**. 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.



**Figure 4-10: Final Proposed Site Layout**

Source: McCrossan O'Rourke Manning Architects

An evaluation of the northern gables was performed as part of the final design to determine the optimum approach for integrating the proposed blocks without reducing the existing residential amenities of Cedarview residences.

Reduced heights (4 storeys along the southern boundary; originally, 5/4/6 storeys) were chosen as the best design solution. Reduced heights at the northern elevations (i.e., 3 storeys), particularly in blocks 2 and 3, would be lower than the ridge height of buildings closer to Cedarview. This approach allows for a smoother transition from the proposed increased heights to the south and ensures that existing residential amenities at Cedarview residences are protected.

Final heights are recommended in accordance with national and regional planning policy directions of increased height and density, particularly at locations near current or projected high-frequency and high-capacity public transportation, such as the subject site.

Combined with adequate separation distance, the final design also introduces a framed structure to the groupings of projecting balconies on the development's north-western corners of each block.

The final design also incorporates changes to the landscape plan, such as improvements to public open spaces and play areas and a revised redline that includes temporary construction access and parking areas.

The design refinements proposed as part of the final design will allow for the redevelopment of a strategically underutilised site, currently consisting of a surface car parking area, to deliver a well-considered architectural design solution for the delivery of an integrated development in accordance with the national planning policy principles of compact growth, increased density, and building heights. Furthermore, the final design will assist in softening the transition in scale and height between Cedarview and the proposed development.

The design of the proposed development has been assessed and is reported upon within the chapters of this EIAR.

## 4.7 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 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.

## 4.8 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. Best practice design and mitigation measures set out in this EIAR will contribute to reducing risks and have been prescribed to avoid any potential impacts on environmental receptors. 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

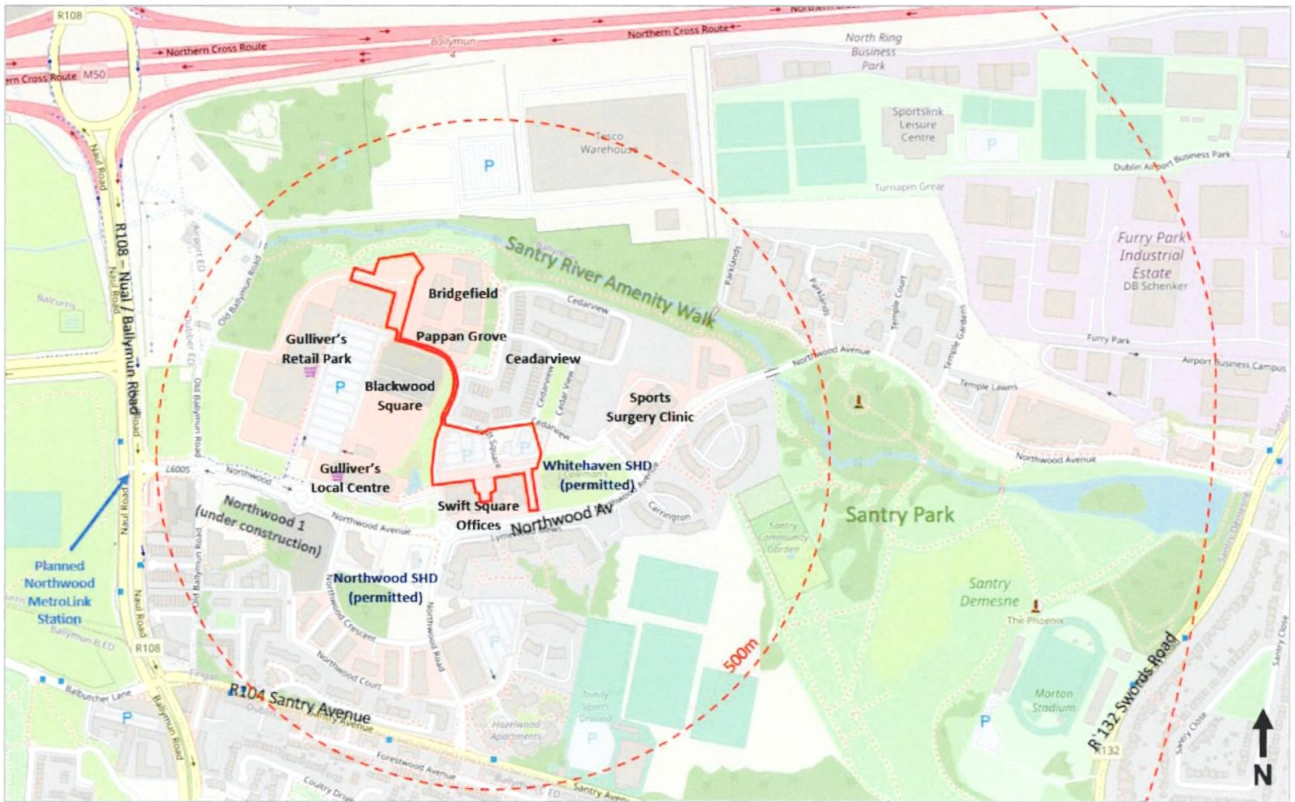
**Chapter 5** (Project Description) sets out a description of the proposed development. In accordance with the EIA Directive and the Planning Regulations, the description of the proposal should comprise “(...) information on the site, design, size, and other relevant features of the proposed development”.

This chapter has been prepared by Helena Gavin and Carlos Lara Gonzalez of RPS Group Ltd, with input from Patrick McNabola of McCrossan O’Rourke Manning Architects, Garry Flood of J.B. Barry & Partners Ltd, Richard McElligott of McElligott Engineers and Simone Kennedy of Kevin Fitzpatrick Landscape Architects. **Section 1.8 of Chapter 1** (Introduction) of Volume 2 of this EIAR provides details of the experience and qualifications of the authors.

A description of the site and its surrounding is presented, together with the proposed development. A summary of the demolition and construction phases of the development is also presented. This description sets the basis against which the specialist assessments presented in this EIAR have been undertaken.

### 5.2 Location of the Proposed Development

The proposed development is located on a site (c. 1.919 ha<sup>4</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

<sup>4</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.

### 5.3 Adjacent Land Uses

The subject site is located north of Northwood Avenue. The site and its adjacent lands have been subject to significant change over the last 15 years. Swift Square Office Park is located to the south and is occupied by several tenants, including BMW Ireland, NSAI, Affidea and Lenovo. Gulliver's Retail Park and Gulliver's Local Centre are located to the west. Gulliver's Retail Park accommodates Lidl, Homebase, Home Focus, Mr. Price, Petmania, Jysk, Sports Surgery Clinic facilities and several other stores. Gulliver's Local Centre accommodates a Spar food store, Costa Coffee, a McDonald's takeaway restaurant, a McCabes pharmacy, a hair salon, and beauty salon, a dry cleaner and other local shops and services.

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 for 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 for 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 Land Use

The subject site is currently used as a surface car parking area associated with the Swift Square Park Office (254<sup>5</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. An aerial photograph of the site is shown in **Figure 5-2**.

<sup>5</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).

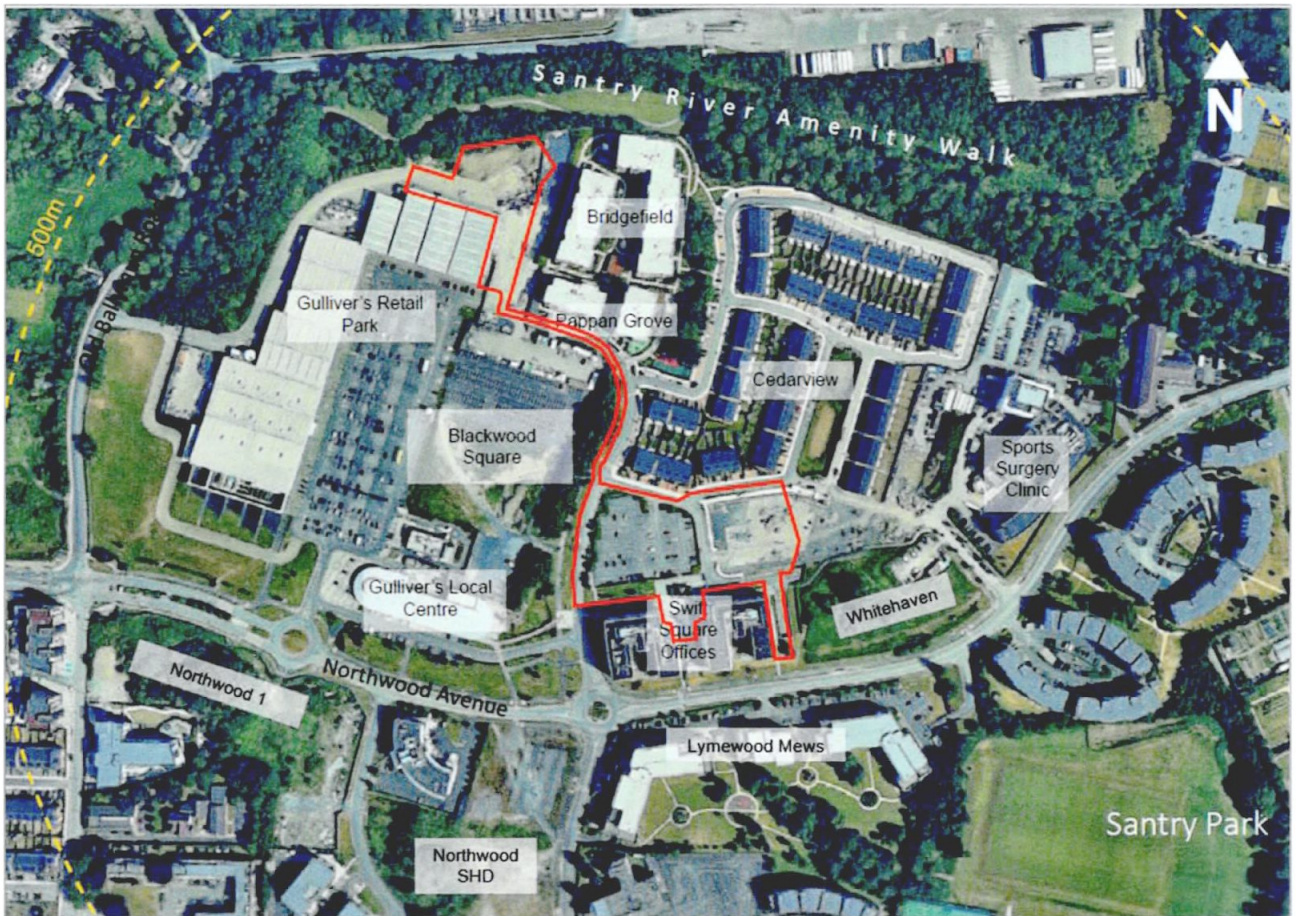


Figure 5-2: Aerial View (indicative outline in red)

Source: Google Maps, RPS annotation

## 5.4.1 Existing Access

### 5.4.1.1 Existing Vehicular Access

The location of the proposed development site in the context of the surrounding road network is indicated in Figure 5-3.



**Figure 5-3: 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.

The main approach roads serving the site include the following. All distances between the subject site and the mentioned roads are calculated as the crow flies unless specified otherwise.

- A local access road runs along the site's western boundary, connecting Northwood Avenue to the south.
- Along the north boundary of the site, there is a local access road that runs east to west and connects to the Cedarview housing development.
- Northwood Avenue runs to the south of the site.
- Old Ballymun Road runs north to south, intersecting with the western end of Northwood Avenue.
- Ballymun Road (R108) is a dual carriageway that runs north to south, c. 700m to the west of the site.
- Swords Road (R132), which is a 3-4 lane carriageway running north to south, approximately 1.1 km to the east of the site,
- The M50, which runs in an east-west direction, is c. 600m to the north of the site and is c. 750m from the Ballymun M50 Interchange.
- Santry Avenue (R104), a 2-lane road running east to west, is approximately 550m to the south of the site.
- Northwood Road runs north to south and connects Northwood Avenue with Santry Avenue.

The main junction points onto Northwood Avenue in the immediate vicinity are primarily signal-controlled. 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.

### 5.4.1.2 Existing Pedestrian and Cycling Infrastructure

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.

The Ballymun Road (R108) has an off-road cycle track, while Swords Road (R132) has an on-road cycle track. 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 permitted under Ref. F15A/0440, there are pedestrian routes connecting to the Santry River Amenity Walk (also referred to as Santry River Greenway in the Greater Dublin Area Cycle Network Plan) via Cedarview and Bridgefield residential development to the north. This planning permission also provided an east-west pedestrian/cycle route between Cedarview and Swift Square Office Park which has been developed.

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. This link connects with the east-to-west route permitted as part of Ref. F15A/0440.

In combination, these routes provide linkages and access from the subject site to existing and proposed public transport options. These are illustrated in **Figure 5-3**.

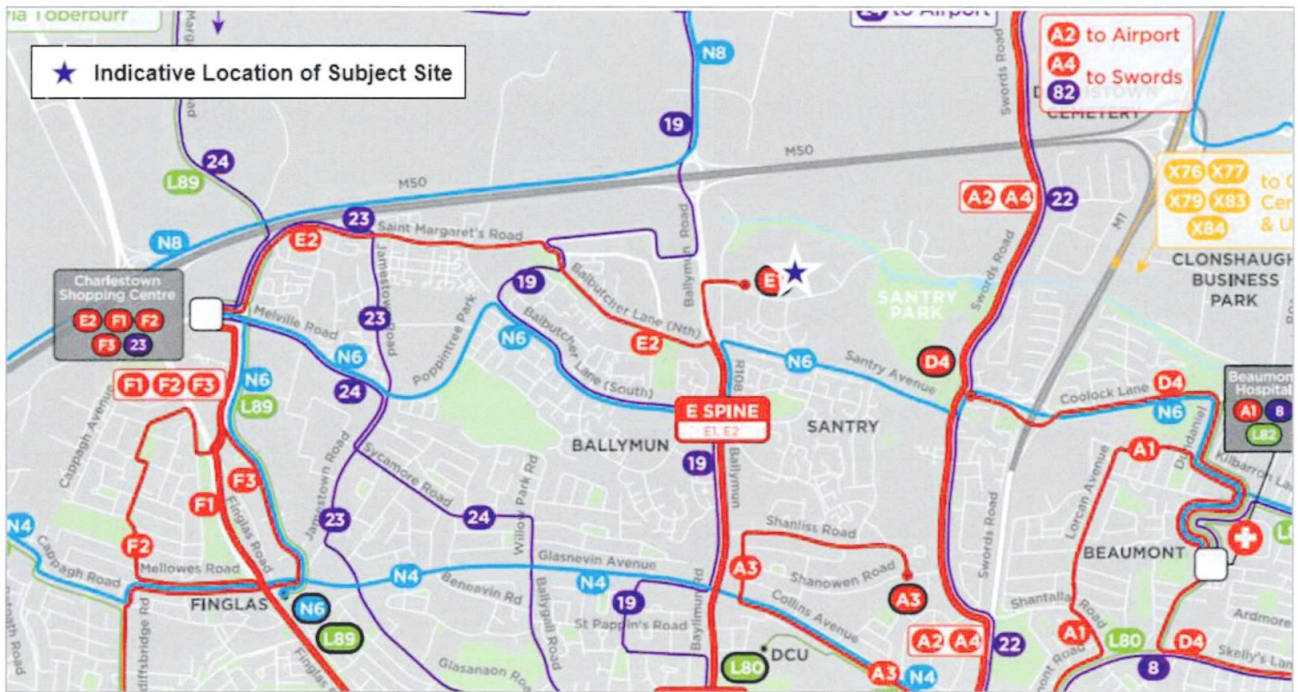
### 5.4.1.3 Existing Public Bus Transport

Dublin Bus operates several routes in the vicinity of the site but none along Northwood Avenue. Routes 4, 13 and 155 stops are located along the Ballymun Road (R108) into Dublin City Centre, approximately 700m from the site. Routes 16, 27B, 33, 41, 41b and 41c stops are located along Swords Road (R132), approximately 1,100m from the site. Orbital Route N6 stops are located along Santry Avenue (R104) c. 500m and travel into Finglas and Howth Junction. These services provide a comprehensive range of services as summarised in **Chapter 15** (Material Assets: Traffic and Transport) of Volume 2 of this EIAR.

### 5.4.1.4 Permitted and proposed Public Transport

BusConnects includes changes to the Dublin bus system intended to make it more efficient, faster, reliable, and easier to use. Elements of the initiative include Core Bus Corridors and Dublin Bus Network Design. 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. Routes are shown in **Figure 5-4** below.





**Figure 5-4: Planned Bus Network**

Source: *Busconnects.ie*

A planning application for Spine E, the Ballymun / Finglas to City Centre Core Bus Corridor Scheme, was submitted to ABP in September 2022 (Ref. ABP-314610-22). The planning application for Spine D, the Swords to City Centre Core Bus Corridor Scheme, has not yet been submitted to ABP. In September 2022, Transport Infrastructure Ireland (TII) submitted a planning application (Railway order) to ABP (Ref. ABP-314724-22) for the rail line project known as MetroLink. MetroLink will consist of a new fully segregated railway which will link run from Swords, in north County Dublin, to Charlemont in Dublin city centre. The rail line will serve multiple residential communities such as Swords, Ballymun and Glasnevin, as well as Dublin Airport, the city centre, and significant employment, education, and other facilities. The route can be seen in **Figure 5-5**.