

4 DESCRIPTION OF REASONABLE ALTERNATIVES

4.1 INTRODUCTION

This Chapter of the EIAR sets out the reasonable alternatives that have been considered for the Proposed Development and provides an indication of the main reasons for the final scheme choice, taking into account the effects on the environment in the context of the characteristics of the site (receiving environment). Article 5(1)(d) of the EIA Directive requires Environmental Impact Assessment Reports (EIAR) to include the following: -

“a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment”.

Paragraph 2 of Annex IV elaborates the requirement, as follows: -

“A description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.”

Pursuant to Section 3.4.1 of the Environmental Protection Agency (EPA) Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EPA, 2022), the consideration of alternatives also needs to be cognisant of the fact that: -

“...in some instances some of the alternatives described below will not be applicable – e.g. there may be no relevant ‘alternative location’...”

In accordance with EPA Guidelines (EPA, 2022), different types of alternative may be considered at several key phases during the process. As environmental issues emerge during the preparation of the EIAR, alternative designs may need to be considered early on in the process or alternative mitigation options may need to be considered towards the end of the process.

The EPA Guidelines (EPA, 2022) states: -

“The objective is for the developer to present a representative range of the practicable alternatives considered. The alternatives should be described with ‘an indication of the main reasons for selecting the chosen option’. It is generally sufficient to provide a broad description of each main alternative and the key issues associated with each, showing how environmental considerations were taken into account in deciding on the selected option. A detailed assessment (or ‘mini-EIA’) of each alternative is not required.”

Thus, the reasonable alternatives studied by the project design team and in the context of the associated Regulations, the alternatives of the Proposed Development in this EIAR Chapter as follows: -

- Alternative Locations.
- ‘Do Nothing’ Alternative.
- Alternative Processes.
- Alternative Mitigation Measures.
- Alternative Layouts & Designs.

This chapter has been prepared by Richard Kealey, Senior Planner and Ana Jovanovic of Stephen Little & Associates. Richard has c. 9 years’ combined professional experience in planning in both the public sector and private consultancy, and has a BSc in Geography and a MSc in Sustainable Development. Ana has c. 1 year of professional experience in the planning field, has a Bachelor of Science (Honours) (City Planning & Environmental Policy, MRUP (Regional & Urban Planning)).

4.2 DEVELOPMENT RATIONALE

The Proposed Development seeks to provide a residential development, ancillary public open space and road infrastructure on residentially zoned land. The nature of the development proposed is

actively promoted at this location by Fingal County Council (FCC), through the Fingal Development Plan 2023 – 2029 ('the Development Plan') and having regard to other local and strategic plans and guidance.

The assessment of the Proposed Development in this EIAR has had regard to the detailed design as described and illustrated in the accompanying plans & particulars which accompany the planning application to the Board. This includes the relevant drawings and reports prepared by the Design Team.

4.3 MAIN ALTERNATIVES STUDIED

The main alternatives considered during the development of this project comprise alternative design solutions and layouts for a predominantly residential development at the subject site.

4.3.1 Alternative Locations

Under the Development Plan, the subject site is zoned 'RA' (Residential Area), the objectives of which aim to: -

Objective RA: -

"Provide for new residential communities subject to the provision of the necessary social and physical infrastructure".

As such it is considered that the Site is entirely suitable for the nature of development as proposed in the LRD planning application. It is not considered necessary to consider an alternative site location for the proposed development as a result.

4.3.2 'Do-Nothing' Alternative

In the event of a 'do-nothing' scenario, the Site would remain 'as-is' with the undeveloped nature of the Site or its former agricultural use retained.

A do-nothing approach would be contrary to FCC's objectives to promote residential land use at this site, in accordance with national, regional and local planning policy and guidance. It would potentially result in a failure of the housing needs of the County being appropriately met and the Site being identified as 'vacant land'. An opportunity to achieve efficient and compact development which benefits from existing public transport connectivity would be undermined. A 'do nothing' approach would be considered inappropriate from a planning and housing perspective.

From an environmental perspective, beyond impact on human health from a failure to deliver sustainable residential development to meet housing and community development needs and further sustainable based on alternatives to travel by private car, a 'do nothing' approach is otherwise likely to result in a neutral impact on the environment in respect of material assets, land, water, air, climate, cultural heritage, biodiversity and landscape.

4.3.3 Alternative Processes

Alternative processes for the proposed housing, supporting facilities, amenities and infrastructure, at Construction and Operational Phase of the development, are discussed below: -

- **Construction Phase:** The proposed construction works comprise relatively standard building construction processes. As such there are no specific alternative construction processes identified in this EIAR.
- **Operational Phase:** No new, unusual or technically challenging operational techniques are required, as such no alternative operational processes have therefore been considered at this point.

4.3.4 Alternative Mitigation Measures

The mitigation measures as outlined in the various chapters of this EIAR are considered appropriate to the location, nature and extent of the project and its potential impacts. Due to this no alternative mitigation measures have been considered.

4.3.5 Alternative Layouts & Designs

The development of the wider Portmarnock South lands has generally been guided by a Development Framework Plan, prepared by Burke Kennedy Doyle Architects which was included as part of the development of Phase 1B (ABP Ref. 300514-17). As such, the layout has not deviated substantially from the Framework Plan other than minor adjustments to the layout due to detailed design and adherence to the aviation safety restriction regarding density.

Notwithstanding, there have been some minor changes arising from the pre-planning dialogue which have been taken into consideration.

The EIAR provides reasonable evidence that the Proposed Development can be accommodated in the subject site without predicted risk of significant adverse impact on the environment, subject to the identified mitigation measures at Construction and Operational Phases being implemented.

No specific further alternatives in respect of the nature, design and layout of the Proposed Development have been identified in the recommended EIAR mitigation measures.

4.3.5.1 LRD Meeting Layout (2025)



Figure 4.1: Extract from previously LRD Meeting proposal (LRD0002-S2) from 2022.

The Applicant has entered into pre-planning dialogue in 2022. The proposal at the time comprised 192no. units and included the Recorded Monument land to the southeast. FCC issued their LRD Opinion in May 2022. The Applicant did not proceed to make a planning application at that time as the decision for Phase 1D was subject to a Judicial Review (case has been settled).

Environmental Effects of the Final Proposed Development compared to LRD Meeting Proposal (2022)			
Environmental Factor	Headings Under which the Environmental Factors were Assessed	Topic	Comparative Effect of Preferred Option
Population and Human Health		Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Biodiversity		Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Land, Soil & Geology		Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Water	Surface Water	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
	Waste Water	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
	Water Supply	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
	Flood Risk	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Climate	Air Quality & Climate Change	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
	Sunlight / Daylight	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Air	Noise and Vibration	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Material Assets	Traffic and Transport	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
	Waste	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
	Utilities	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Landscape and Visual	Visual Impact	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Cultural Heritage	Archaeological & Architectural	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction/Operational Phase.

4.3.5.2 FCC Pre-Planning Layout

The Proposed Development was the subject of a Section 247 Pre-Planning meeting with FCC prior to the submission of the LRD Meeting request to the FCC. The meeting helped to inform the design team's concept proposals.

The initial Proposed Development consisted of c. 320no. residential units and associated landscaping, parking and open space (included the Recorded Monument land to the southeast) on a net c. 9.7 Ha site.

Figures 4.2 and 4.3 below shows the Site layout as shown at the initial Section 247 Pre-Planning Meeting with FCC.





Figure 4.2 & 4.3: Layout as submitted to FCC for S.247 Pre-Planning Meeting.

The key issues from an environmental perspective which arose during the Section 247 Pre-Planning meeting that have influenced the current proposals can be summarised as follows: -

- Architecture – ensure sightlines are kept.
- Heritage – Consideration to be given to the legibility of the monument.
- Parks – Consistency with the Development Plan to be justified by accounting for bed spaces instead of residential units.
- Transport – Ensure good cycle/pedestrian connectivity throughout the site.
- Planning – Concern regarding 18no. dwellings on site of interm St. Marnocks Pumping Station

Environmental Effects of the Final Proposed Development compared to Layout at FCC Pre-Planning Layout			
Environmental Factor	Headings Under which the Environmental	Topic	Comparative Effect of Preferred Option

	Factors were Assessed		
Population and Human Health		Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Biodiversity		Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Land, Soil & Geology		Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Water	Surface Water	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
	Waste Water	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
	Water Supply	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
	Flood Risk	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Climate	Air Quality & Climate Change	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
	Sunlight / Daylight	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Air	Noise and Vibration	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Material Assets	Traffic and Transport	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
	Waste	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
	Utilities	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Landscape and Visual	Visual Impact	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Cultural Heritage	Archaeological & Architectural	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction/Operational Phase.

4.3.5.3 LRD Meeting Layout (2025)

The scheme as submitted with the LRD Meeting request to FCC had been progressed via an iterative process. The scheme as submitted comprised of 194no. residential dwellings in a mix of houses and

duplexes ranging in heights from 1.5 to 3 storeys. The layout provided for a reduced quantum of car parking and significant increase in bicycle parking provision. The area of the Recorded Monument was omitted for this phase of development.

Figure 4.3 below shows the site layout as shown at the LRD Meeting with FCC.



Figure 4.3: Layout as submitted to FCC for An Bord Pleanála Pre-Planning Meeting.

The key issues from an environmental perspective which arose during the LRD Meeting that have influenced the current proposals can be summarised as follows: -

- Consideration to be given to quality and quantum of public open space provided along Monument View (in particular the provision of space suitable for 'kick-about'.
- Consideration separation / segregation of pedestrian / cycle path along Monument View to provide safer environment.
- Consider a reduction in the width of Monument View and introduce traffic calming measures.

Environmental Effects of the Final Proposed Development compared to Layout at LRD Meeting Proposal (2024)			
Environmental Factor	Headings Under which the Environmental Factors were Assessed	Topic	Comparative Effect of Preferred Option
Population and Human Health		Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Biodiversity		Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Land, Soil & Geology		Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Water	Surface Water	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
	Waste Water	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
	Water Supply	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
	Flood Risk	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Climate	Air Quality & Climate Change	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
	Sunlight / Daylight	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Air	Noise and Vibration	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Material Assets	Traffic and Transport	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
	Waste	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
	Utilities	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Landscape and Visual	Visual Impact	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction / Operational Phase.
Cultural Heritage	Archaeological & Architectural	Construction Phase Operational Phase	<u>Neutral, imperceptible and permanent</u> No perceived additional adverse effects during construction/Operational Phase.

4.3.5.4 Final Proposed Development

The proposal development broadly consists of 296 no. residential units and all associated and ancillary site development works. The proposal also includes minor amendments to the site works permitted under Portmarnock Phase 1D (ABP Ref. ABP- 312112-21 refers) of the Strategic Housing Development (SHD) process.

Adjustment have been made to the proposed development following the LRD Meeting (10th June 2025) and in response to the design issues raised in the LRD Opinion. In broad terms, the key change are as follows:-

- Significant change to the scope of the RZLT and previous dialogue with Uisce Eireann (new requirement for a 1.7km rising main)
- Updated cul-de-sac to now passive pedestrian link
- Changes to the housing mix with wider variety unit mix for wider range of occupiers and buyers

The Design Statement, prepared by Burke Kennedy Doyle Architects outlines the holistic design response to the planning design issues raised by the FCC.

The development as now proposed is considered to have arrived at an optimal solution in respect of making efficient use of zoned, serviceable lands whilst also addressing the potential impacts on the environment relating to residential, visual, natural and environmental amenities and infrastructure.

The Proposed Development subject of this LRD planning application will comprise generally of the following: -

- 296no. units (254no. houses and 42no. apartments/duplexes ranging from 1.5 – 3 storeys in height).
- Provision of public open space, including southern Monument Park (which also formed part of Racecourse Park development permitted under ABP Ref.: JP06F.311315
- A total of 289no. car parking spaces and 1455no. bicycle parking spaces.
- Vehicular access to serve the development will be provided from Station Road via existing road serving St. Marnock's Bay ('Monument View') and 3no. permitted roads serving St. Marnock's Bay ('Skylark Park Court', 'Skylark Park Drive' and an extension of 'Monument View') permitted under ABP Ref. ABP-312112-21 as amended by FCC Reg. Ref. LRD0037/S3, and also a new existing permanent road to the south which connects to Moyne Road (permitted under Phase 1D ABP Ref. ABP-312112-21, as amended by FCC Reg. Ref. LRD0037/S3
- A new (temporary) rising main to serve this phase and previous development phases (1A to 1E inclusive) c. 1.7km long, running from the interim St. Marnock's Pumping Station at Station Road/The Avenue (constructed under ABP Reg. Ref. 300514-17 & upgraded under ABP Reg. Ref. 312112-21) passing through the Racecourse Park development permitted under ABP Ref.: JP06F.311315 and connecting to the North Fringe Sewer at a point which is located south of Moyne Road and the Mayne River within the townland of Stapolin, Baldoyle, Dublin 13
- Upgrade of interim St. Marnock's Pumping Station and storage at Station Road/The Avenue as required and all associated and ancillary site development and reinstatement.
- All associated and ancillary site development, infrastructural, landscaping and boundary treatment works.



Figure 4.4: The layout of the Proposed Development as submitted as part of this LRD Planning Application.

Please refer to Chapter 3: Description of Proposed Development of the EIAR for a further detailed description of the Proposed Development. The final design presents the most effective utilisation of this significant site, fulfils FCC objectives and ensures the optimum provision of much-needed housing while delivering residentially led, mixed use development of the highest quality.

To summarise it is considered that the final layout: -

- Advances the strategic and statutory objectives applicable to these lands and the wider area.
- Optimises development space within the overall site, in an efficient and sustainable manner.
- Enables extensive economic development through both employment created at Construction and Operational Phases, and also under future phases of development.
- Avoids the necessity to utilise in a non-sustainable manner other greenfield lands, particularly those in the Greater Dublin Area.
- Affords excellent play opportunities and open space provision for the Proposed Development and to members of the public.

- Encourages the use of public transport and provides pedestrian and cycle links throughout and in future phases to minimise car usage within the scheme.
- Avoids significant environmental impacts.

The final iteration of the Proposed Development is not considered to give rise to any significant adverse environmental impacts. Mitigation measures to be implemented at construction and operation stages of the project are summarised in Chapter 19: Summary of Mitigation Measures of the EIAR.