

Application to
Dun
Laoghaire-
Rathdown
County
Council

Environmental
Impact
Assessment
Screening
Report

Proposed Large-Scale
Residential
Development
consisting of 271no.
residential units & site
works.

On lands in the
townland of Old
Connaught, Bray,
County Dublin.

For Castlethorn Old
Conna ULC

OCTOBER 2026

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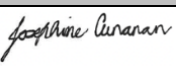
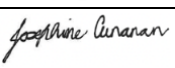
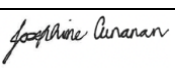
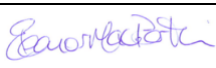
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1 INTRODUCTION

We, Stephen Little & Associates, Chartered Town Planners & Development Consultants, 26 / 27 Upper Pembroke Street, Dublin 2 D02 X361, are instructed by Castlethorn Old Conna ULC (the Applicant) to prepare this Environmental Impact Assessment (EIA) Screening Report. It accompanies the planning application for Large-Scale Residential Development at lands in the townland of Old Connaught, County Dublin.

The proposed development occupies a 6.9ha site.

Proposed development comprises:

- 271no. dwellings in a mix of houses and duplex / apartment units, including
 - 103no. 2 to 3-storey houses (22no. 4-bedroom, 68no. 3-bedroom and 13no. 2-bedroom),
 - 162no. apartments (113no. 2-bedroom and 49no. 1-bedroom) across 4no. blocks ranging from 1-5 storeys and
 - 6no. 3-bedroom duplex units in a 3-storey terrace;
- 1no. creche (c. 574 sqm) at ground floor of Apartment Block 3;
- and all associated and ancillary site development and infrastructural works including:
 - on site attenuation,
 - hard and soft landscaping and boundary treatment works, including: public open space; communal open space;
 - components of the regional attenuation pond;
 - public lighting;
 - surface car parking spaces;
 - bicycle parking spaces/stores for houses and duplex / apartment units;
 - 5no. ESB substations;
 - bin stores;
 - vehicular access via existing Old Connaught Avenue and a proposed new primary north-south street extending into the eastern portion of the Central Character Area.
- The proposed development also includes the construction of a new pumping station, associated single storey building and ESB substation, twin rising main extending circa 400m along Old Connaught Avenue under the M11 connecting to the existing gravity foul network on Old Connaught Avenue c. 125m east of the M11 bridge and associated storage, together with all ancillary site development and reinstatement works required to facilitate these elements.

We are satisfied that the steps taken in the application process to date, which address the significant number of objectives in the Dun Laoghaire-Rathdown County Development Plan 2022-2028 and Old Connaught Local Area Plan 2025, which in turn went through an exhaustive Strategic Environmental Assessment and Appropriate Assessment process, result in a proposed development that will not result in likely significant adverse effects on the environment.

Having carried out this EIA screening assessment, it is our professional planning opinion that, the proposed development is subthreshold the relevant mandatory thresholds identified for **Class 10(b)** projects

Therefore, it is our professional opinion that there is no requirement for an Environmental Impact Assessment Report (EIAR) in this case.

The purpose of this EIA screening report is to provide the necessary information that supports our opinion and to enable Dun Laoghaire-Rathdown County Council, the competent authority, to reach its own determination on whether or not the planning application for the proposed development should be accompanied by an EIAR.

2 QUALIFICATIONS AND COMPETENCE OF THE AUTHORS OF THIS REPORT

Stephen Little & Associates Chartered Town Planners and Development Consultants was established in 2003 by Stephen Little, Managing Director.

Stephen Little & Associates has extensive experience of providing planning consultancy advice on a range of civic, commercial and residential developments. This includes the preparation and co-ordination of planning applications and Environmental Impact Assessment Reports for significant development projects, in accordance with the Planning & Development (Amendment) Act 2000 (as amended), associated Planning Regulations and relevant Ministerial Guidelines for Planning Authorities.

This document has been prepared by Peter Opio, Josephine Cunanan and Richard Kealey from Stephen Little & Associates.

Peter Opio, BSc TU Dublin is a Planning Consultant at Stephen Little & Associates. Peter has 2 years post-graduate professional experience of Town Planning and EIA preparation in Ireland.

Josephine Cunanan, BSc, MSc, University College Dublin, is an Assistant Planner at Stephen Little & Associates. Josephine has 2 years post-graduate professional experience of Town Planning and EIA preparation in Ireland.

Richard Kealey BSc, MSc, Queens University Belfast, is a Senior Planner at Stephen Little & Associates. Richard has 9 years post-graduate professional experience of Town Planning and EIA preparation in Ireland and England.

3 LEGISLATION & GUIDANCE

Directive 2014/52/EU has been transposed into Irish Legislation by the Planning & Development Act 2000, as amended, and the Planning and Development Regulations 2001, as amended. The methodology employed in this screening exercise is in accordance with the EIA Guidelines published in May 2022 by the DoHPLG and addresses the contents of both Schedule 7 and 7A of the Planning and Development Regulations 2001, as amended.

The EIA Screening exercise has been carried out in accordance with the following guidance documents:

- Guidelines on the information to be contained in Environmental Impact Assessment Reports (EPA 2022).
- Office of the Planning Regulator Practice Note PN02: Environmental Impact Assessment Screening (June 2021).
- Environmental Impact Assessment – Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018; DoECLG).
- Environmental Impact Assessment of Projects – Guidance on Screening (EU Commission, 2017).
- Transposition of 2014 EIA Directive (2014/52/EU) in the Land Use Planning and EPA Licensing Systems – Key Issues Consultation Paper (2017:DoHPCLG).
- Preparation of guidance documents for the implementation of EIA directive (Directive 2011/92/EU as amended by 2014/52/EU) – Annex I to the Final Report (COWI, Milieu; April 2017).
- Guidance for Consent Authorities regarding Sub-threshold Development (2003; DoEHLG).

4 THE PROJECT - DESCRIPTION OF DEVELOPMENT

Following s.247 and s.32B consultation with the planning authority, planning permission is now sought for the proposed LRD development described in brief as follows: –

Castlethorn Old Conna ULC Intends to Apply for Permission for a Large-Scale Residential Development, at this site (c. 6.9ha) on lands at Old Connaught, County Dublin.

The proposed development comprises 271no. residential units in a mix of houses and apartment buildings ranging in height from 2 to 5 storeys overall including:

- 13no. 2 storey 2-bedroom houses;
- 63no. 2 storey 3-bedroom houses;
- 5no. 3 storey 3-bedroom houses;
- 22no. 3 storey 4-bedroom houses;
- 168no. apartment units accommodated across 4no. blocks comprising:
 - Block 1 ranging in height from 2-5 storeys accommodating 54no. apartment units (19no. 1-bed, 29no. 2-bed) with balconies / terraces and 6no. 3-bed duplex units in a 3-storey terrace.
 - Block 2 ranging in height from 2-5 storeys accommodating 41no. apartment units (9no. 1-bed and 32no. 2-bed) with balconies / terraces.
 - Block 3 ranging in height from 1-5 storeys accommodating 38no. apartment units (13no. 1-bed and 25no. 2-bed) with balconies / terraces. A childcare facility is also provided at ground floor level of Block 3 with an associated outdoor play area (225.4sqm).
 - Block 4 ranging in height from 1-4 storeys accommodating 35no. apartment units (8no. 1-bed and 27no. 2-bed) with balconies / terraces
- All associated and ancillary site development and infrastructure work, including on-site attenuation, hard and soft landscaping, boundary treatments, public open space (c. 0.5 Ha), communal open space (c. 0.1 Ha), components of the regional attenuation pond, public lighting, bin stores;
- Total of 289no. car parking spaces including the provision of 241no. surface car parking spaces inclusive of 15no. visitor car parking spaces, 48no. undercroft car parking spaces, 11no. disabled car parking spaces
- Provision of 435no. bicycle parking spaces inclusive of 351no. residential bicycle parking spaces, 84no. visitor bicycle parking spaces; 12no. motor bicycle parking spaces, and stores serving the houses, duplex units and apartments;
- 5no. ESB substations;

New vehicular access is proposed via the existing Old Connaught Avenue and a proposed new primary north-south street extends into the eastern portion of the Central Character Area.

The proposed development also includes the construction of a new pumping station, associated single storey building and ESB substation, twin rising mains extending c. 400m along Old Connaught Avenue, under the M11, connecting to the existing gravity foul network on Old Connaught Avenue 125m east of the M11 bridge, and associated storage, together with all associated site development and reinstatement works required to facilitate these elements.



Figure 1: Extract from Proposed Masterplan Drawing prepared by O'Mahony Pike Architects.

5 SCREENING FOR ENVIRONMENTAL IMPACT ASSESSMENT

The proposed development was screened early in the planning design phase to establish the requirement for EIA. In accordance with the EIA Directive, EU Guidelines (2017), EPA Guidelines (2022) and applicable legislation, the project was examined in the context of 'type of development' and 'thresholds'.

Article 4(1) and Annex I of the EIA Directive (2014/52/EU) lists projects for which an EIA is mandatory, whereas Article 4(2) and Annex II lists project types for which an EIA may be required.

The requirement for Environmental Impact Assessment of certain projects under the EIA Directive is transposed into Irish legislation by Part X of the Planning and Development Act 2000, as amended ("the Act"). The specified categories of development in respect of which EIA is required are set out under the Fifth Schedule of the Planning and Development Regulations 2001 as amended ('the Regulations').

The Fifth Schedule of the Regulations lists classes of development where an EIA is mandatory under Part 1 or Part 2, where the project exceeds the relevant threshold, and where an EIA may be required where the proposed development falls short of the relevant threshold but is likely to have significant effects on the environment.

There are four steps in determining need for Environmental Impact Assessment (EIA) for a project which are set out below. Should any of the answers to these four questions be positive, then an EIA is required for the project and an EIAR should be prepared.

5.1 EIA Screening Assessment

5.1.1 Q1A Is the Project an Annex I or Annex II Project as prescribed in the Directive 97/11/EC (after 85/337/EC) as amended in 2003, 2009 or 2014)?

The proposed development, already described above, broadly comprises of a residential development within a site of **6.9ha**. The proposal comprises a residential **271 no. residential units**, comprising a mix of houses and apartments providing a range of 1-bed, 2-bed, 3-bed, and 4-bed dwellings, with building heights varying between 1-5 storeys. A childcare facility (crèche) is proposed at ground floor level of Block 3, and associated and ancillary site development, landscaping and boundary treatment works.

Additionally, the project includes a pumping station and a connection to the public foul network via twin rising mains under the M11 to the east, as well as elements of the regional attenuation pond and the main North-South link road through the site.

We consider that the relevant categories of development to be considered, are those contained in **Schedule 5, Part 2** of the Regulations.

Specifically:

Class 10 (b) – Infrastructure Projects, includes: -

*“(i) **Construction of more than 500 dwelling units...***

*(iv) Urban development which would involve an area **greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.***

(In this paragraph, ‘business district’ means a district within a city or town in which the predominant land use is retail or commercial use.)”

SLA bold font emphasis

Having regard to the nature and extent of the proposed development, it is our considered opinion that **the proposed development does not meet or exceed the relevant thresholds for mandatory EIA**, identified above and is well below the 500 dwellings and 10 hectare mandatory EIAR thresholds.

We consider each of the relevant thresholds in turn as follows: -

5.1.1.1 Class 10(b)(iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.

This proposal is located within lands at Old Connaught, County Dublin. Old Connaught, which forms part of Bray, is considered a Key Town per the Regional Spatial Economic Strategy Settlement Hierarchy. Therefore, the project arises within a location that falls within the category of Key Town – Suburban / Urban Extension.

The site of the proposed development measures c.6.9ha and is significantly below the 10ha site area threshold for Class 10(b)(iv) urban development, in a built up area, that is not a business district.

Therefore, a *mandatory* EIAR is not required.

5.1.1.2 Class 15 - Any project listed in this Part which does not exceed a quantity, area or other limit specified in this Part in respect of the relevant class of development, but which would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.’

As the proposed development does not exceed a quantity, area or other limit specified in Part 2 of Schedule 5, in respect of the relevant class of development (Class 10), we proceed to consider the provisions of Class 15 in respect of the sub-threshold assessment criteria identified in Schedule 7 and 7A of the Regulations.

5.1.2 Q1B Is the project likely to have a significant effect on a Natura 2000 site?

We refer the Planning Authority to the **Appropriate Assessment Screening Report**, prepared by Brady Shipman Martin Built Environment Consultants.

This concludes:

“In view of best scientific knowledge this report concludes that the proposed development at Old Connaught (Phase A1) individually or in combination with another plan or project, will not have a significant effect on any European sites. This conclusion was reached without considering or taking into account mitigation measures or measures intended to avoid or reduce any impact on European sites.

It is considered that this report provides sufficient relevant information to allow the Competent Authority (Dún Laoghaire-Rathdown County Council) to carry out an Appropriate Assessment Screening under section 177U of the Planning Acts and reach a determination that the proposed development will not have any likely significant effects on European sites in light of their conservation objectives.”

Additionally, we refer the Planning Authority to the **Ecological Impact Assessment Report**, prepared by Brady Shipman Martin Built Environment Consultants.

This assessment generally concludes:

“In summary, the proposed development will result in a minor to moderate negative impact on biodiversity in the short term (during construction and initial establishment of landscaping). This will transition to a neutral or minor positive impact in the medium to long term, once the replacement native planting becomes established and the retained hedgerow and treeline features are supplemented by the new landscaping proposals. Overall, the site will provide equal or greater ecological value in the long term compared to the current intensively managed agricultural baseline. There will be no long-term residual impacts on ecological receptors within or in the vicinity of the proposed development, or on any designated sites. The proposed development will not result in any significant effects on any European site, as confirmed in the Appropriate Assessment Screening Report prepared in support of this application.”

It may therefore be concluded that the project is not likely to have a significant effect on Natura 2000 sites, having regard to the scientific information provided.

5.1.3 Q2 Is the project on a mandatory list for which EIA is always required?

The project is not on a mandatory list for which EIA is always required.

5.1.4 Q3 Is the project on an exclusion list of projects for which EIA is not required?

There is no positive requirement to address this question as there is no formal exclusion list for subthreshold projects where EIA is not required.

Please refer to responses to Q1 above and Q4 below, relevant to EIA screening for this project.

5.1.5 Q4 Is the Project likely to have significant effects on the environment?

The proposed development is considered to be outside the mandatory requirements for EIA.

The next step in the screening process is to determine whether there is a requirement for an EIA, where the proposed development is subthreshold.

5.2 Sub-Threshold EIA Considerations

An Environmental Impact Assessment Report (EIAR) is required to accompany an application for permission for a development of a class set out in Schedule 5 of the Planning and Development Regulations 2001 (as amended), which equals or exceeds, as the case may be, a limit, quantity or threshold set for that class of development.

Sub-threshold development means “development of a type set out in Part 2 of Schedule 5 which does not equal or exceed, as the case may be, a quantity, area or other limit specified in that Schedule in respect of the relevant class of development”.

As demonstrated above, the relevant thresholds for mandatory EIA have not been exceeded by the proposed development. An EIAR will nonetheless be required in respect of sub-threshold development

where the Planning Authority considers that the proposed development would be likely to have significant effects on the environment.¹

The Departmental Guidelines (August 2018) state in relation to such a preliminary EIA screening that:

“3.4. For all sub-threshold developments listed in Schedule 5 Part 2, where no EIAR is submitted or EIA determination requested, a screening determination is required to be undertaken by the competent authority unless, on preliminary examination it can be concluded that there is no real likelihood of significant effects on the environment. This is initiated by the competent authority following the receipt of a planning application or appeal.

3.5. A preliminary examination is undertaken, based on professional expertise and experience, and having regard to the ‘Source – Pathway – Target’ model, where appropriate. The examination should have regard to the criteria set out in Schedule 7 to the 2001 Regulations.”

It may be noted that a number of environmental assessments have been undertaken in respect of the proposed development and accompany the planning application. These includes an **Appropriate Assessment Screening Report** and **Ecological Impact Assessment Report** prepared by Brady Shipman Martin Built Environment Consultants enclosed within the application. We refer otherwise to the schedule of plans and particulars that accompany the application.

Whilst the proposed development represents the first of new residential development on the greenfield lands, existing adjoining uses are not materially different in location which is predominately residential in nature.

We refer the Planning Authority generally to the accompanying **Architectural Design Statement and elevational drawings prepared by O’Mahony Pike Architects** for details on the proposed building height, massing and architectural expression.

We refer also to the enclosed **Landscaping Architecture Plans prepared by Brady Shipman Martin Built Environment Consultants**.

Furthermore, we refer the Planning Authority to the enclosed **Archaeological and Architectural Assessment**, prepared by Irish Archaeological Consultancy Ltd which generally concludes:

“There are no protected structures or buildings listed in the NIAH within the proposed development area. The closest protected structure consists of a walled garden at Festina Lente (originally associated with Old Connaught House), which is located c. 10m to the west (RPS No. 1876; NIAH No. 60260075).

A review of the Excavations Bulletin (1970–2026) has revealed that one previous investigation has been carried out within the eastern portion of the proposed development area, comprising a geophysical survey in 2008, followed by test trenching in 2010 (Nicholls 2008, Licence No. 08R0308; Bayley 2010, Licence No. 10E0345). A burnt spread measuring 11m x 11m was recorded within the proposed development area, which may represent a possible fulacht fia. No further finds or features of archaeological significance were uncovered.

Analysis of cartographic sources has revealed that the proposed development area was situated within the demesne landscape associated with Old Connaught House, which itself is located c. 365m northwest of the proposed development site (NIAH, 60260073. RPS, 1875). The house was constructed at the end of the 18th century and the demesne and walled gardens established at this time. After 1871 the landscape was extended further, but more recent developments have impacted on the original landscape, including the construction of the N11. Much of the greenspace has reverted to agricultural use.

A review of the aerial photographic coverage shows that the landscape containing the proposed development has remained relatively unchanged since 1995. Google Earth coverage, dating to June 2018, shows a potential circular enclosure (as a crop mark) located to the immediate west of

¹ See s. 172(1)(b) of the Planning and Development Act 2000, as amended.

the proposed development area. The mark is not definitive and would require further investigation in order to confirm an archaeological origin.

A field inspection has been carried out as part of this assessment and this confirmed the results of the baseline analysis. No previously unrecorded archaeological sites, or architectural structures, were noted within the proposed development area. No indication of archaeological remains were noted at the site of the potential enclosure.”

It may therefore be concluded that the project is not a mandatory project and is significantly below mandatory thresholds for EIAR and is supported by the submission of suitable environmental reports including an AA screening and EclA report.

5.2.1.1 Nature of any associated demolition works

It is noted that no demolition is proposed to facilitate the proposed development.

5.2.1.2 Use of Natural Resources (Soil, Land, Water, Biodiversity)

A **Construction & Environmental Management Plan (CEMP)**, prepared by AWN Consulting identifies the methodology for addressing the process of excavation, reuse and transportation of spoil as necessary. The CEMP aims to ensure the management of construction activity is carried out in a planned, structured and considerate manner which minimises the impacts of the works on the local environment, residents and commercial activities in the vicinity of the site.

The enclosed **Resource Waste Management Plan (RWMP)**, prepared by AWN Consulting provides the information necessary to ensure that the management of construction waste at the site is undertaken in accordance with the current legal and industry standards. This RWMP includes information on the legal and policy framework for Construction waste to be generated by the proposed development and makes recommendations for management of different waste streams.

The enclosed **Operational Waste Management Plan (OWMP)**, prepared by AWN Consulting presents a waste strategy that addresses all legal requirements, waste policies and best practice guidelines and demonstrates that the required storage areas have been incorporated into the design of the Proposed Development.

Ecological assessments of the subject site have been prepared to determine the likely presence of flora, fauna and habitats that would require protection. We refer the Planning Authority to the accompanying **Appropriate Assessment Screening Report** and **Ecological Impact Assessment Report prepared by Brady Shipman Martin Built Environment Consultants**.

We refer the Planning Authority to the **Engineering Planning Report** and **Stormwater Impact Assessment Report** prepared by Atkins Consulting Engineers which provides details in respect of Surface Water Drainage, Wastewater Drainage and Potable Water Infrastructure.

A proposed pump station for the Old Connaught LAP lands has been designed by Atkins Realis and Uisce Eireann as part of the proposed LRD application. We understand that the detailed design is currently the subject of a technical review by Uisce Eireann.

The Planning Application, in the meantime, is supported by a **Foul Pump Station and Rising Main** prepared by Atkins Consulting Engineers which has been designed in accordance with Uisce Eireann design requirements. Plans and particulars which accompany the LRD Planning Application show the foul pumping station and the twin rising mains extending south of the site, along Old Connaught Avenue, which will provide a connection to the local Bray foul sewer network to the east of the N/M11.

This foul drainage infrastructure has been included as part of the proposed Phase A1 planning application in consultation with DLRCC. A letter of consent from DLRCC accompanies this application given the pumping station and associated rising mains which are located in the local authority's lands.

The enclosed **Flood Risk Assessment**, prepared by Atkins Consulting finds that the majority of the site is located within Flood Zone C, with only limited encroachment of Flood Zones A and B into

peripheral areas of the development lands. The FRA represents Stage 1 and 2 assessment and demonstrates that no further flood risk assessment is necessary to support this planning application.

Given the site location in an upland location from the east coast, the application is also supported by a **Wind Microclimate Study** prepared by IES. The report concludes that no mitigation is needed for any upper level balcony, open space and that suitable walking comfort criterion are met.

The accompanying reports identified above acknowledge that the proposed works will take place within a new residential area, at lands previously in agricultural use with adjacent residential uses located in the wider locality.

Nearest sensitive receptors are primarily adjacent residential or commercial land uses. The design of the project ensures suitable separation distances and other design mitigation are included to protect existing and prospective residential amenity and sensitive neighbouring uses.

Lands immediately adjacent Festina Lente Equestrian Centre and the residential house to the south 'The Orchard, A98 YD25' buildings are set well back from the boundary to ensure no undue harm arises and are low rise in nature in this location. Old Connaught House to the west and Ferndale Court Apartments to the north, also benefits from a substantial separation distance to safeguard existing amenity.

In our professional planning opinion, having regard to the findings of the assessments that accompany the planning application, the proposed development does not give rise to any significant new environmental impacts.

5.2.1.3 Production of Waste

An **Operational Waste Management Plan** prepared by AWN Consulting, accompanies the application and outlines the strategy for management of waste from the proposed development during operational stages of the proposed development.

The enclosed **Resource Waste Management Plan (RWMP)**, prepared by AWN Consulting, provides the information necessary to ensure that the management of construction waste at the site is undertaken in accordance with the current legal and industry standards.

5.2.1.4 Pollution and Nuisance

Construction activities, including noise, vibration and dust emissions, could potentially have adverse impacts on the amenities of neighbouring properties and the local road network, during the construction stage. A **Construction & Environmental Management Plan**, prepared by AWN Consulting accompanies this application to ensure that appropriate mitigation measures are employed to avoid adverse impact on the amenities of neighbouring properties and the local road network arising from construction activities and the potential nuisances associated with same. The potential for soil/and or water pollution during the operation phase is also addressed.

With regards to noise and vibration, the application is supported with an **Environmental Noise and Vibration Impact Assessment** prepared by Traynor Environmental Ltd. This report considers the application sites proximity to the M11/N11 as well as potential noise and vibration impacts associated with both the construction and operation phases of the proposed development. The report generally concludes that:

*"Through implementation of Best Practicable Means in accordance with BS 5228, together with the mitigation measures identified in this report and the Construction Environmental Management Plan (CEMP), **significant residual construction noise and vibration effects are not predicted.***

The operational assessment demonstrates that transportation noise from the N11/M11 corridor will remain the dominant environmental noise source affecting the development. Representative operational noise from the safeguarded Indicative Luas Reservation and external air source heat pumps serving the proposed houses has also been incorporated within

*the assessment. **These sources do not materially alter the overall acoustic design strategy for the development.***

5.2.1.5 Risk of Major Accidents and / or Disaster

The proposed development would not involve the use of technologies or substances that would present a significant risk of major accident at this location.

The application site is not proximate to any Seveso/COMAH designated sites. The nearest appearing to be as follows: -

Lower Tier: -

- Synergen Ltd. t/a ESB Dublin Bay Power, Pigeon House Road, Ringsend, Dublin 4 (c. 19km)
- Electricity Supply Board, North Wall Generating Station, Alexandra Road, Dublin 1 (c. 23km)

Upper Tier

- Fareplay Energy Ltd./ Circle K Energy Ltd., Fareplay Terminal Dublin, Promenade Road, Dublin Port, Dublin 3 (c. 18km)
- National Oil Reserves Agency Ltd./ NORA, Shellybanks Road, Ringsend, Dublin 4 (c. 19km)
- National Oil Reserves Agency Ltd., Poolbeg Tankfarm, Pigeon House Road, Dublin 4 (c. 19km)

The application site is outside the 300m consultation distance of these establishments.

5.2.1.6 Risk to Human Health

Similar to all construction sites, construction works giving rise to air and noise emissions that have the potential to impact human health. Appropriate mitigation measures will be identified in the **Construction Environmental Management Plan** prepared by AWN Consulting. The mitigation measures of the final CEMP to be agreed with the planning authority will apply equally to any permission for the proposed development.

An **Operational Waste Management Plan**, prepared by AWN Consulting as submitted with this application for the proposed development.

In terms of water integrity, the subject site is serviced. Therefore the development can be connected to public foul and surface water systems. We refer the Planning Authority to the enclosed **Engineering Planning Report**, prepared by Atkins Réalis Consulting for further detail.

With regards to noise and vibration, the application is supported with an **Environmental Noise and Vibration Impact Assessment** prepared by Traynor Environmental Ltd. This report notes in table 18 that the proposed creche, apartments and houses are all BS 8233 compliant. As such, a high quality standard of accommodation will be produced and ensures human health will not be impacted. Construction risks will be suitability managed and are temporary in nature.

5.2.2 Location of Proposed Development²

5.2.2.1 Existing Land Use

The Dun Laoghaire-Rathdown County Council Development Plan and Old Connaught LAP have been the subject of Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA), as a mandatory part of the statutory Plan preparation process. The application site has therefore already been deemed

² This section addresses the information required under paragraph 1(b) of Schedule 7A of the 2001 Regulations, as amended.

capable of absorbing the nature and extent of the proposed development through the Development Plan making process, including a process of SEA and AA.

The subject site comprises c. 6.9 Ha of greenfield lands, which are located to the North of Old Connaught Avenue, Bray County Dublin. The site is generally bound by agricultural lands to the north, M11 to the east, Old Connaught Avenue to the south and Festina Lente Equestrian Centre to the south west.

The lands will be accessed via Old Connaught Avenue and served by one vehicular access point from the primary north-south street into the Central Character Area Lands – East in accordance with the LAP.

Active travel routes facilitate a choice of alternative modes of transport, e.g. walking, cycling and use of existing and planned public transport, with potential to reduce reliance on private car travel.

The topography of the site is generally level, and is characterised by agricultural lands, comprising mature trees. An Arboricultural Impact Assessment and Tree Survey plans accompany the planning application. The Landscape Masterplan is informed by the arborist assessment, and ensures optimisation of tree and hedgerow preservation within the public open spaces and along the site boundaries.

The applicant has engaged a qualified ecological consultant (Brady Shipman Martin Built Environment Consultants) to assess whether proposed development is likely to have a significant environmental impact on any European sites. We refer the Planning Authority to the **Appropriate Assessment Screening Report**.

Adequate water and power are available for the needs of the proposed development. We refer the Planning Authority to the enclosed **Engineering Planning Report**, prepared by Atkins Réalis Consulting for further detail.

For the avoidance of doubt, the application site is not within or directly connected to a wetland, riparian areas and river mouths, nor is it in a coastal or marine environment, a mountain or forest area, or a nature reserve or park. It does not form part of any Natura 2000 site. The site is not in an area where there has already been a demonstrated failure to meet the environmental quality standards, laid down in EU legislation and relevant to the project.

The various reports that have accompany this planning application in relation to ecology, transportation, flood risk, energy, set out that the development is capable of being absorbed into the existing environment.

We also refer the Planning Authority to the enclosed **Archaeological and Architectural Assessment** prepared by Irish Archaeological Consultancy Ltd which address the potential impacts on the heritage and archaeological setting.

5.2.2.2 Relative Abundance, Quality and Regenerative Capacity of Natural Resources in the Area

The proposed development is compliant with the Dun Laoghaire-Rathdown County Development Plan 2022-2028. The application site is zoned for the type of development already absorbed within the Bray key town settlement and proposed to be extended on site.

The Dun Laoghaire Rathdown County Development Plan 2022-2028 has been the subject of Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) as part of the statutory Plan preparation process.

We refer the Planning Authority to the enclosed **Appropriate Assessment Screening Report**, prepared by Brady Shipman Martin Built Environment Consultants which finds that the potential for likely significant effects on Natura sites can be ruled out.

Adequate water and power are available for the needs of the proposed development. We refer the Planning Authority to the enclosed **Engineering Planning Report**, prepared by Atkins Réalis Consulting for further detail.

5.2.3 Aspects of the Environment Likely to be Affected by the Proposed Development³

As indicated above, a range of expert reports have addressed a number of different aspects of the environment that could potentially be affected by the proposed development. These reports describe the aspects of the environment likely to be affected, in so far as these are relevant to the particular circumstances of the proposed development.

A summary of these reports is set out below: -

5.2.3.1 Construction Environmental Management Plan

We refer the Planning Authority to the Construction Environment Plan (CEMP) prepared by AWN Consulting, which accompanies this application. This report addresses general site setup, pre-commencement measures, working hours, traffic management, dust control and noise control all associated with the construction works. It provides an outline of the methods and sequence in which construction works will be carried out.

The final Construction Management Plan and strategy will be prepared by the appointed contractor in accordance with the measures detailed in this report.

5.2.3.2 Resource Waste Management Plan

A **Resource Waste Management Plan**, prepared by AWN Consulting is also enclosed with this application. The purpose of this plan is to provide information necessary to ensure that the management of construction at the site is undertaken in accordance with the current legal and industry standards. This Plan aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible. It also seeks to provide guidance on the appropriate collection and transport of waste from the site to prevent issues associated with litter or more serious environmental pollution (e.g., contamination of soil and/or water). This RWMP includes information on the legal and policy framework for construction waste management in Ireland, estimates of the type and quantity of construction waste to be generated by the proposed development and makes recommendations for management of different waste streams.

5.2.3.3 Flood Risk Assessment

We refer the Planning Authority to the **Flood Risk Assessment**, prepared by Atkins Réalis Consulting, which has been carried out in accordance with the Department of Housing and Local Government (DEHLG) and the office of Public Works (OPW) document “The Planning Process and Flood Risk Management Guidelines for Planning Authorities” published in November 2009. The Report finds that the risk of flooding is low. The report concludes:

“The purpose of the Stage 1 Flood risk identification process is to establish whether a flood risk issue currently exists or may exist in the future. If a potential flood risk issue is identified the risk will be investigated in further detail by undertaking a Stage 2 – Initial flood risk assessment. However, if no potential flood risk is identified then the overall assessment can conclude at this point.

For this report a Stage 1 Flood Risk Identification and Stage 2 Initial Flood Risk Assessment have been undertaken in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities. The assessment identified fluvial flood risk associated with the Old Connaught Tributary affecting limited portions of the site, principally along the southern and eastern boundaries.

³ This section addresses the information required under paragraph 2 of Schedule 7A of the 2001 Regulations, as amended.

A review of the OPW Flood Maps, DLR County Development Plan SFRA and Old Connaught LAP SFRA indicates that the majority of the site is located within Flood Zone C, with only limited encroachment of Flood Zones A and B into peripheral areas of the development lands.

Application of the Sequential Approach has informed the site layout and all residential dwellings, apartment buildings and other highly vulnerable development have been located within Flood Zone C. Limited infrastructure elements including sections of road and buried utilities occur within Flood Zones A and B; however, these elements will not impede flood flows or increase flood risk elsewhere.

The development incorporates surface water management measures, exceedance flow routing, climate change allowances and finish floor levels outside the extents of flood zones. The proposed development can therefore be developed safely without giving rise to unacceptable flood risk to people, property or the surrounding environment.

The Stage 2 Initial Flood Risk Assessment has demonstrated that the proposed development is compatible with the identified flood risk constraints and that vulnerable development has been directed towards Flood Zone C in accordance with the Planning System and Flood Risk Management Guidelines. No further flood risk assessment is considered necessary to support this planning application."

5.2.3.4 Transportation Assessment

The enclosed **Traffic and Transportation Report** has been prepared by Atkins Réalis Consulting where it is concluded,

"The assessment demonstrates that the Old Conna Phase 1a development is acceptable from a transport and traffic perspective, subject to planned infrastructure delivery and future network improvements.

Key conclusions are:

- *Strong alignment with planning policy: The proposal fully accords with national and regional objectives to prioritise sustainable mobility, reduce car dependence, and support compact growth.*
- *Integrated and sustainable design: The scheme delivers critical infrastructure early, including link roads, active travel routes, and public transport corridors, enabling long-term sustainable travel behaviour.*
- *Encouragement of modal shift: The development supports a transition towards walking, cycling, and public transport, consistent with projected reductions in car mode share.*
- *Road network performance:*
 - *The local and site access network will operate efficiently*
 - *Identified constraints (e.g. Wilford Roundabout in future years) are primarily due to cumulative regional growth, not the development in isolation*
- *Compliance with best practice: The scheme complies with DMURS, Cycle Design Manual, and TII guidelines, ensuring a safe, high-quality urban environment.*

The proposed development can be accommodated on the transport network without significant adverse impacts, while actively contributing to the delivery of a sustainable, well-connected community in accordance with the Old Conna LAP vision."

5.2.3.5 Appropriate Assessment Screening

We refer the Planning Authority to the **Appropriate Assessment Screening Report**, prepared by Brady Shipman Martin Built Environment Consultants, enclosed with this application.

The report concludes the following: -

"In view of best scientific knowledge this report concludes that the proposed development at Old Connaught (Phase A1) individually or in combination with another plan or project, will not have a

significant effect on any European sites. This conclusion was reached without considering or taking into account mitigation measures or measures intended to avoid or reduce any impact on European sites.

It is considered that this report provides sufficient relevant information to allow the Competent Authority (Dún Laoghaire-Rathdown County Council) to carry out an Appropriate Assessment Screening under section 177U of the Planning Acts and reach a determination that the proposed development will not have any likely significant effects on European sites in light of their conservation objectives."

5.2.3.6 Ecological Impact Assessment Report

We refer the Planning Authority to the **Ecological Impact Assessment Report**, prepared by Brady Shipman Martin Built Environment Consultants, enclosed with this application. the document concludes the following: -

"The proposed development will result in the loss of arable crops, improved grassland, and spoil and bare ground within the development footprint. However, the proposed development prioritises the retention of the key ecological features on-site, substantially reducing the overall ecological impact.

Although the construction of access roads and related infrastructure is unavoidable, the retention of Hedgerows 3, 4, 5, 7, and 8, the southern treeline, and the mature oak tree within the central arable field will ensure continuity of the most ecologically important habitats on-site. These retained features will continue to support foraging and commuting activity for protected species (common pipistrelle, soprano pipistrelle, Leisler's bat and brown long-eared bat), provide nesting habitat for common bird species, and maintain habitat connectivity to the wider landscape.

The loss of grassland and arable habitat within the development footprint will result in a temporary reduction in foraging habitat for birds in the short term. However, comprehensive mitigation measures will ensure that ecological value is restored and enhanced in the medium to long term. These measures include extensive planting of trees, native hedgerows, ornamental shrubs, grasses, perennials and bulbs throughout the development (in accordance with the All-Ireland Pollinator Plan 2026-2030); installation of 14 bat boxes (comprising 6 bat tree boxes and 8 Schwegler 2F boxes); sensitive dark sky lighting design to provide commuting and feeding corridors for bats; and comprehensive landscape design with communal open space and public open space.

There will be no loss of confirmed bat roosting sites as a result of the proposed development, and no derogation licence is required. The retained southern treeline, which supported the most intensive bat activity during surveys, will be unlit by the proposed development and will continue to provide commuting and foraging opportunities, supplemented by bat boxes.

The 25 bird species recorded during breeding surveys will continue to utilize the site as nesting habitat within the retained hedgerow and treeline features. The loss of grassland foraging habitat will be partially compensated by new trees and shrub planting along with installation of insect boxes which will provide enhanced insect habitat and nesting opportunities in the medium term.

No evidence of badger activity was recorded on-site despite extensive surveys and camera trapping over the 2025-2026 survey period. Therefore, the proposed development will have no impact on badger populations. Pine marten habitat connectivity will be maintained and enhanced through the retention of Hedgerows and the southern treeline, supplemented by comprehensive planting throughout the development, ensuring continued foraging and commuting opportunities for this species within the wider landscape network.

The comprehensive Sustainable Urban Drainage System (SuDS) design, incorporating a regional attenuation pond (4655 m³ volume for Phase 1), swales, permeable paving, green roofs, filter drains, and flow control devices, will manage surface water runoff to an agreed discharge rate

of 56.34 l/s. This will ensure no long-term impacts on the Crinken Stream or downstream watercourses. The distance to the nearest coastal European sites (Bray Head SAC approximately 3 km south; Dalkey Island SAC approximately 6 km north) ensures that any potential contamination would be diluted to background levels before reaching sensitive receptors.

In summary, the proposed development will result in a minor to moderate negative impact on biodiversity in the short term (during construction and initial establishment of landscaping). This will transition to a neutral or minor positive impact in the medium to long term, once the replacement native planting becomes established and the retained hedgerow and treeline features are supplemented by the new landscaping proposals. Overall, the site will provide equal or greater ecological value in the long term compared to the current intensively managed agricultural baseline. There will be no long-term residual impacts on ecological receptors within or in the vicinity of the proposed development, or on any designated sites. The proposed development will not result in any significant effects on any European site, as confirmed in the Appropriate Assessment Screening Report prepared in support of this application."

5.2.3.7 Landscaping Report

We refer the Planning Authority to the **Landscaping Report** and associated drawings which have been prepared by Brady Shipman Martin Built Environment Consultants as part of this planning application.

5.2.3.8 Arboricultural Assessment Report

We refer the Planning Authority to the **Arboricultural Assessment Report** and associated **Arboricultural drawings** which have been prepared by The Tree File Ltd and enclosed as part of this planning application.

5.2.3.9 Landscape & Visual Impact Assessment

We refer the Planning Authority to the enclosed **Landscape and Visual Impact Assessment**, prepared by ModelWorks. This report generally concludes:

"In conclusion, the overall landscape effects are classified 'moderate neutral', and the proposal can be considered an appropriate intervention in the landscape. The development would initiate the planned urban expansion of Bray into the Old Connaught area and would establish a high standard of design (for layout/urban grain, architecture and the public realm/landscape) that would serve as a benchmark for subsequent phases. While the development may initially appear somewhat incongruous in the peri-urban landscape, this is unavoidable for the first phase of a planned urban expansion. As the LAP is further implemented, the development would be increasingly integrated into the evolving landscape and would contribute positively to the creation of a coherent, attractive and distinctive new neighbourhood."

The purpose of this study is to assess the likely impact of the proposed development on the existing landscape settings of the site (i.e. change in landscape character and visual impact) and describe any mitigation measures. This assessment should be read in conjunction with the Photomontages of the proposed scheme, prepared by ModelWorks.

Consideration of landscape and visual aspects of the scheme has been integral in the architectural design, layout, and landscaping measures proposed. Tree protection, site hoarding, appropriate lighting, traffic management and phasing, as part of a well-managed site is key to minimising adverse visual impact during construction stage.

5.2.3.10 Archaeological & Architectural Heritage Impact Assessment

We refer the Planning Authority to the enclosed **Archaeological and Architectural Assessment** prepared by Irish Archaeological Consultancy Ltd which address the potential impacts on the heritage and archaeological setting. This concludes that:

"There are no protected structures or buildings listed in the NIAH within the proposed development area. The closest protected structure consists of a walled garden at Festina Lente (originally associated with Old Connaught House), which is located c. 10m to the west (RPS No. 1876; NIAH No. 60260075).

A review of the Excavations Bulletin (1970–2026) has revealed that one previous investigation has been carried out within the eastern portion of the proposed development area, comprising a geophysical survey in 2008, followed by test trenching in 2010 (Nicholls 2008, Licence No. 08R0308; Bayley 2010, Licence No. 10E0345). A burnt spread measuring 11m x 11m was recorded within the proposed development area, which may represent a possible fulacht fia. No further finds or features of archaeological significance were uncovered.

Analysis of cartographic sources has revealed that the proposed development area was situated within the demesne landscape associated with Old Connaught House, which itself is located c. 365m northwest of the proposed development site (NIAH, 60260073. RPS, 1875). The house was constructed at the end of the 18th century and the demesne and walled gardens established at this time. After 1871 the landscape was extended further, but more recent developments have impacted on the original landscape, including the construction of the N11. Much of the greenspace has reverted to agricultural use.

A review of the aerial photographic coverage shows that the landscape containing the proposed development has remained relatively unchanged since 1995. Google Earth coverage, dating to June 2018, shows a potential circular enclosure (as a crop mark) located to the immediate west of the proposed development area. The mark is not definitive and would require further investigation in order to confirm an archaeological origin.

A field inspection has been carried out as part of this assessment and this confirmed the results of the baseline analysis. No previously unrecorded archaeological sites, or architectural structures, were noted within the proposed development area. No indication of archaeological remains were noted at the site of the potential enclosure."

5.2.3.11 Sunlight, Daylight & Shadow Analysis

We refer the Planning Authority to the enclosed **Sunlight, Daylight & Shadow Analysis Report**, prepared by ModelWorks which finds: -

"The proposed development is predominantly a low-rise scheme located on a green field site in a semi-rural setting. The results of the analysis for the provision of daylight to the rooms are very positive. The scheme has an overall compliance rate of 98% of the rooms meeting the BRE Guide when assessed with trees, and 99% when trees are excluded. The scheme also achieves a high level of compliance for sunlight provision with 88% of the units meeting the BRE Criteria, and 73% achieving a Medium or High level of sunlight exposure.

Included in the development is c. 5900m² of amenity space, three communal open spaces (COS), two public open spaces (POS), and a creche play area. All individual spaces meet the BRE Guide for sunlight provision, and combined, 95% of their area meet the threshold of 2 hours of sunlight on 21st March.

The majority of buildings in the scheme rise to just 2-3 storeys and four apartment blocks ranging in height from 3 to 5 storeys. This modest massing, together with the generous separation distances to existing buildings, ensures that the effect on the receiving environment is very limited. Only one existing dwelling required consideration in the assessment, and it was predicted to experience no more than a negligible impact.

The BRE Guide and BS EN 17037:2018 are expressly advisory documents intended to inform professional judgement rather than impose rigid compliance thresholds. These standards explicitly recognise that numerical targets must be interpreted flexibly, and acknowledge that minor deviations affecting a limited number of rooms do not undermine the acceptability of a development."

5.2.3.12 Energy and Sustainability Statement

We refer the Planning Authority to the enclosed **Energy and Sustainability Statement**, prepared by Delap & Waller. This report notes:

“The proposed development is required to demonstrate compliance with the energy and sustainability standards of Part L (2022), whilst being aware of the requirements also outlined in the Old Connaught Local Area Plan 2025.

Technical Guidance Documents Part L requires an overall improved energy performance for the fabric, services, lighting and renewable specification of all new build developments. For the residential dwellings, the standard requires an overall improved energy performance for the fabric, services and lighting specification. The standard requires a Carbon Performance Coefficient (CPC) level of <0.35 and an Energy Performance Coefficient (EPC) level of <0.30. The NZEB standard also introduces a mandatory requirement for renewable energy sources, providing 20% of the primary energy use.

The ‘Be Lean, Be Clean, Be Green’ principles of the energy hierarchy have been incorporated throughout the design. As a result, the space heating, cooling (as relevant) and lighting energy demand is minimised through a passive fabric first approach. This is exemplified through improved u-values, good thermal detailing, low air tightness rates, high levels of natural daylight penetration and a passive thermal comfort strategy.

A feasibility study was carried out to determine the most feasible and effective low zero carbon and renewable energy technologies for use within the development. The analysis and proposed strategy uses highly efficient Air Source Heat Pumps (ASHPs) to deliver space heating and domestic hot water.

Using the proposed fabric, energy and renewable strategies outlined in the previous sections, all buildings within the proposed development will achieve compliance with TGD Part L (2022) and consequently the Old Connaught Local Area Plan 2025 policies. Compliance has been demonstrated through DEAP calculations. The table below summarises the provisional results achieved.

House Type	Energy Performance Coefficient (EPC)	Carbon Performance Coefficient (CPC)	Renewable Energy Ratio (RER)	BER Rating
Apartment Type 1	0.238	0.157	0.332	BER A
Apartment Type 2	0.277	0.182	0.277	BER A
House Type 1	0.264	0.170	0.261	BER A
House Type 2	0.270	0.175	0.244	BER A
Duplex Type 1	0.272	0.175	0.277	BER A
Duplex Type 2	0.276	0.178	0.268	BER A

Figure 2: Extract from the Energy & Sustainability Statement, Prepared by Delap & Waller - Table 7: Part L Energy, Carbon and Renewable Performance – Dwellings.”

5.2.4 Likely Significant Effects on the Environment⁴

The third section of Schedule 7, refers to:

“the likely significant effects on the environment of proposed development in relation to criteria set out under paragraphs 1 and 2, with regard to the impact of the project on the factors specified in paragraph (b)(i)(I) to (V) of the definition of ‘environmental impact assessment report’ in section 171A of the Act.”

⁴ This section addresses the information required under paragraph 3 of Schedule 7A of the 2001 Regulations, as amended, as well as considering the criteria under paragraph 3 of Schedule 7.

Under Section 171A of the Planning and Development Act 2000, as amended, the effects of the proposed development on the following factors needs to be evaluated:

- i. "Population and human health;
- ii. biodiversity, with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive;
- iii. land, soil, water, air and climate;
- iv. material assets, cultural heritage and the landscape;
- v. the interaction between the factors mentioned in clauses (I) to (IV)"

Having regard to the brief description of the characteristics and location of the proposed development (Sections 5.2.1 and 5.2.2 above) and relevant aspects of the environment likely to be affected (Section 5.2.3) already identified, we do not consider it necessary to repeat these descriptions again for each of the factors above.

Having regard also to the mitigation measures contained in the relevant expert environmental assessments, which accompany this application, we proceed then to identify below the likely significant effects on the environment in respect to items I-V above.

5.2.4.1 Population and human health

European Commission guidance relating to the implementation of the 2014 Directive, in reference to Human Health, states:

*"Human health is a very broad factor that would be highly project dependent. The notion of human health should be considered in the context of other factors in Article 3(1) of the EIA Directive and thus environmentally related health issues (such as health effects caused by the release of toxic substances to the environment, health risks arising from major hazards associated with the project, effects caused by changes in disease vectors caused by the project, changes in living conditions, effects on vulnerable groups, exposure to traffic noise or air pollutants) are obvious aspects to study."*⁵

The EPA Guidelines on the information to be contained in environmental impact assessment reports states that 'in an EIAR, the assessment of impacts on population and human health should refer to the assessments of those factors under which human health effects might occur, as addressed elsewhere in the EIAR e.g. under the environmental factors of air, water, soil etc⁶.

By way of description of this aspect of the environment in the context of the proposed development, the following should be noted: -

Planning Policy Context

The proposed development is consistent with the relevant policies and objectives of the Dun Laoghaire-Rathdown County Development Plan 2022-2028. The plan came into effect on 21st April 2022 and is the statutory land-use plan governing the subject lands at this time.

The proposed development is also consistent with the relevant policies and objectives of the Old Connaught LAP 2025.

We refer the Planning Authority to the **Planning Application Report** enclosed with this planning application, prepared by Stephen Little & Associates, which clarifies how the proposed development is consistent with all of the relevant policies and objectives of the statutory County Development Plan and LAP, and thus with the proper planning and development of the area.

The proposed development is consistent with the relevant National Policy Objectives of the First Revision of the National Planning Framework (NPF).

⁵ *Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report, European Commission, 2017 <http://ec.europa.eu/environment/eia/ria-support.htm>*

⁶ Guidelines on the information to be contained in environmental impact assessment reports, EPA, 2017

The proposed development is similarly consistent with the strategic planning objectives of the Regional Spatial and Economic Strategy for Eastern & Midlands (RSES) and Dublin Metropolitan Area Strategic Plan (DMASP), which seek to implement the growth targets and national policy objectives of the NPF at a regional level.

Mitigation measures will be put in place in accordance with the Construction and Environmental Management Plan and Resource Waste Management Plan to ensure that construction nuisance effects will be minimised within this development during the construction stage.

We refer the Planning Authority to the Planning Application Report enclosed with this Planning Application, prepared by Stephen Little & Associates, which identifies how the proposed development is consistent with strategic planning policy.

Micro-Climatic Effects

We refer the Planning Authority to the **Wind Microclimate study** prepared by Integrated Environmental Solutions (IES) that concludes:

“The site shows the typical behaviour of any site in Dublin, with direct exposure to the southern-to-western arc of winds, which account for 80% of total winds. The landscape design and site layout result in the site performing well with respect to wind comfort.

It was observed that,

- 1 The balconies of all blocks showed excellent results and fully met the requirements of the Sitting and Standing Comfort criteria.*
- 2 All communal Open spaces showed excellent results and fully met the requirements of the Sitting and Standing Comfort Criteria.*
- 3 The community garden showed good results and fully met the requirements of the Sitting and Standing Comfort Criteria.*
- 4 All public Open spaces showed excellent results and fully met the requirements of the Sitting and Standing Comfort Criteria.*
- 5 The creche area of Block 3 showed excellent results and fully met the requirements of the Sitting and Standing Comfort Criteria.*
- 6 Overall results of the walking comfort show excellent compliance with Lawson’s Leisure Walking and Business Walking Comfort criteria.*
- 7 The Lawson’s Normal and Sensitive Pedestrian Safety Criteria are achieved throughout the site.*

The site meets Lawson’s Standing and Sitting criteria when used together in most amenity spaces. It also meets Lawson’s Walking criteria requirements on all pathways.”

Construction and Environmental Management Plan

It is anticipated that a potential construction related nuisance will be appropriately controlled, short-term and not significant to human health.

Assuming that the mitigation measures set out in the **Construction Environmental Management Plan (CEMP)** prepared by AWN Consulting will be implemented, the proposed development is not likely to give rise to potential for significant adverse impact on the environment that would give rise to risk to human health relating to emissions to air or water.

The construction phase of the proposed development will provide for the temporary employment of construction workers which is likely to provide benefits for local businesses providing retail or other services to construction workers and potentially could create some additional employment in the area.

In the long term, it is considered that the impact of the proposed development will be positive, delivering a critically needed housing and a childcare facility to the area.

It is concluded that the proposed development has potential to give rise to some short-term adverse impacts during construction stage, which can be mitigated through the implementation of a **Construction Environmental Management Plan** prepared by AWN Consulting.

Flood Risk

We refer the Planning Authority to the enclosed **Flood Risk Assessment**, prepared by Atkins Réalis Consulting which concludes that risk of flooding on site is low.

5.2.4.2 (ii) Biodiversity, with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive;

By way of description of this aspect of the environment in the context of the proposed development, the following information provided by the Appropriate Assessment Screening Report for the proposed development should be noted.

We refer the Planning Authority to the **Appropriate Assessment Screening Report**, prepared by Brady Shipman Martin Built Environment Consultants, which concludes the following: -

“In view of best scientific knowledge this report concludes that the proposed development at Old Connaught (Phase A1) individually or in combination with another plan or project, will not have a significant effect on any European sites. This conclusion was reached without considering or taking into account mitigation measures or measures intended to avoid or reduce any impact on European sites.

It is considered that this report provides sufficient relevant information to allow the Competent Authority (Dún Laoghaire-Rathdown County Council) to carry out an Appropriate Assessment Screening under section 177U of the Planning Acts and reach a determination that the proposed development will not have any likely significant effects on European sites in light of their conservation objectives.”

Ecological Impact Assessment Report

Ecological assessments of the subject site have been prepared to determine the likely presence of flora, fauna and habitats that would require protection. We refer the Planning Authority to the accompanying **Appropriate Assessment Screening** and **Ecological Impact Assessment Report** prepared by Brady Shipman Martin Built Environment Consultants, and to the **Arboricultural Impact Assessment** prepared by the Tree File Ltd.

5.2.4.3 (iii) land, soil, water, air and climate

Soil

Due to the nature of the proposed development, there will be negligible reuse of any topsoil stripped from the site. No herbicides will be applied by contractors in advance of any site clearance works.

Flood Risk

We refer the Planning Authority to the enclosed **Flood Risk Assessment**, prepared by Atkins Réalis Consulting which concludes that the risk of flooding on site is low.

Climatic Effects

No significant adverse impacts on the environment are predicted to arise in respect of wind/micro-climatic effects arising from the proposed development given the heights proposed (up to 5-storey over basement).

We refer the Planning Authority to the enclosed **Daylight and Sunlight Analysis Report**, prepared by ModelWorks which in summary concludes:

"The proposed development is predominantly a low-rise scheme located on a green field site in a semi-rural setting. The results of the analysis for the provision of daylight to the rooms are very positive. The scheme has an overall compliance rate of 98% of the rooms meeting the BRE Guide when assessed with trees, and 99% when trees are excluded. The scheme also achieves a high level of compliance for sunlight provision with 88% of the units meeting the BRE Criteria, and 73% achieving a Medium or High level of sunlight exposure.

Included in the development is c. 5900m² of amenity space, three communal open spaces (COS), two public open spaces (POS), and a creche play area. All individual spaces meet the BRE Guide for sunlight provision, and combined, 95% of their area meet the threshold of 2 hours of sunlight on 21st March.

The majority of buildings in the scheme rise to just 2-3 storeys and four apartment blocks ranging in height from 3 to 5 storeys. This modest massing, together with the generous separation distances to existing buildings, ensures that the effect on the receiving environment is very limited. Only one existing dwelling required consideration in the assessment, and it was predicted to experience no more than a negligible impact.

The BRE Guide and BS EN 17037:2018 are expressly advisory documents intended to inform professional judgement rather than impose rigid compliance thresholds. These standards explicitly recognise that numerical targets must be interpreted flexibly, and acknowledge that minor deviations affecting a limited number of rooms do not undermine the acceptability of a development."

Arising from all of the above no significant impacts are expected in respect of land, soil, water, air and climate from the proposed development.

5.2.4.4 (iv) material assets, cultural heritage and the landscape

With regard to Material Assets, the EIAR Guidelines (2022) published by the EPA state:

"In Directive 2011/92/EU this factor included architectural and archaeological heritage. Directive 2014/52/EU includes those heritage aspects as components of cultural heritage. Material assets can now be taken to mean built services and infrastructure. Traffic is included because in effect traffic consumes transport infrastructure. Sealing of agricultural land and effects on mining or quarrying potential come under the factors of land and soils. "

Landscape and Visual Impact Assessment

We refer the Planning Authority to the enclosed Landscape and Visual Impact Assessment prepared by Model Works which concludes: -

"The overall landscape effects are classified 'moderate neutral', and the proposal can be considered an appropriate intervention in the landscape. The development would initiate the planned urban expansion of Bray into the Old Connaught area and would establish a high standard of design (for layout/urban grain, architecture and the public realm/landscape) that would serve as a benchmark for subsequent phases. While the development may initially appear somewhat incongruous in the peri-urban landscape, this is unavoidable for the first phase of a planned transformation. As the LAP is further implemented, the development would be increasingly integrated into the evolving urban environment and would contribute positively to the creation of a coherent, attractive and distinctive new neighbourhood."

Transportation

The **Traffic and Transportation Assessment** prepared by Atkins Réalis Consulting demonstrates that the development as now proposed can be accommodated on the existing infrastructure without causing an adverse effect on the transportation environment of the area.

Architectural and Archaeological Heritage

We refer the Planning Authority to the enclosed **Archaeological and Architectural Assessment** prepared by Irish Archaeological Consultancy Ltd.

Utilities

We refer the Planning Authority to the description of existing and proposed drainage and water supply contained in the **Engineering Planning Report** prepared by Atkins Réalis Consulting.

The lands are serviced, and the proposed development would use the water services already present in the area. The proposed pumping station will provide a connection to the foul connection network.

The foul drainage infrastructure has been included as part of our subject Phase A1 planning application with guidance from DLRCC and Irish Water. A letter of consent from DLRCC accompanies this application.

Flood Risk

We refer the Planning Authority to the enclosed Site-Specific Flood Risk Assessment, prepared by Atkins Réalis Consulting which concludes that the risk of flooding is low.

5.2.4.5 (v) the interaction between the factors mentioned in clauses (I) to (IV)

There is potential for interaction of impacts as identified in the grouping of topics above under Items (I) to (IV) above.

No significant adverse environmental impacts are predicted in relation to these interactions.

5.2.4.6 (vi) Vulnerability of the project to risks of major accidents and/ or disasters

There is no significant risk of major accidents and/or disasters arising for the proposed development at this site.

The proposed development would not involve the use of technologies or substances that would present a significant risk of major accident or environmental disaster at this location.

The application site is not proximate to any Seveso/COMAH designated sites.

5.3 Conclusion

EIA is a mandatory requirement for development projects of a class specified in Part 1 or 2 of Schedule 5. The proposed development is subthreshold the relevant classes of development.

This EIA Screening Report seeks to assist the Planning Authority in its determination of the likelihood of significant effects on the environment arising from the proposed development, which is subthreshold the mandatory EIA criteria.

The criteria set out in schedule 7 of the Regulations, and those at Annex III of the EIA directive 2011/92/EU as amended by 2014/52/EU, have then been applied with regard to the characteristics and location of the proposed development, and the type and characteristics of its potential impact.

Having regard to:

- a) *the nature and scale of the proposed development, on zoned lands served by public infrastructure,*
- b) *the absence of any significant environmental sensitivities in the area,*
- c) *the location of the development outside of any sensitive location specified in article 109(3) of the Planning and Development Regulations 2001 (as amended),*

and to the limited nature and extent of the proposed development, the project is not considered likely to result in any long-term significant impacts on its surrounding environment.

In reaching this conclusion, consideration has been given to the following: -

- The location of the proposed development at lands zoned Objective A1 – *‘To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans or approved Framework Plans’*
- The emerging pattern of development in the area and government strategy to deliver much needed housing and childcare.
- The findings of the following Reports enclosed with this application: -
 - Appropriate Assessment Screening Report, prepared by Brady Shipman Martin Built Environment Consultants.
 - Ecological Impact Assessment Report, prepared by Brady Shipman Martin Built Environment Consultants.
 - Environmental Noise and Vibration Impact Assessment, prepared by Traynor Environmental Ltd
 - Daylight and Sunlight and Overshadowing Assessment, prepared by ModelWorks.
 - Wind Microclimate Study prepared by IES
 - Energy and Sustainability Report, prepared by Delap & Waller.
 - Landscape and Visual Impact Assessment, prepared by ModelWorks.
 - Infrastructure Design Report, prepared by Atkins Réalis Consulting.
 - Flood Risk Assessment, prepared by Atkins Réalis Consulting.
 - Traffic and Transportation Assessment, prepared by Atkins Réalis Consulting.
 - Engineering Planning Report, prepared by Atkins Réalis Consulting.
 - Mobility Management Plan, prepared by Atkins Réalis Consulting.
 - Resource Waste Management Plan, prepared by Awn Consulting Engineers.
 - Operational Waste Management Plan prepared by Awn Consulting Engineers
 - Planning Report and Statement of Consistency, prepared by Stephen Little and Associates.
- The mitigation and monitoring measures outlined in the accompanying Reports –

- Appropriate Assessment Screening Report, prepared by Brady Shipman Martin Built Environment Consultants.
- Ecological Impact Assessment Report, prepared by Brady Shipman Martin Built Environment Consultants.
- Arboricultural Report, prepared by The Tree File Ltd.
- Archaeological and Architectural Assessment prepared by Irish Archaeological Consultancy Ltd.
- Resource Waste Management Plan, prepared by AWN Consulting Engineers.
- Operational Waste Management Plan prepared by AWN Consulting Engineers

The need for environmental impact assessment can, in our professional opinion, be excluded. However, we recognise that the Planning Authority is the competent authority in this regard.

STEPHEN LITTLE & ASSOCIATES

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Stephen Little & Associates are committed
to progressing and achieving sustainable
development goals.

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