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15th July 2019

An Bord Pleanála,
64 Marlborough Street,
Dublin 1,

Environmental Health Service Consultation Report

(as a statutory consultee under the Planning and Development Acts 2000 (as amended) Regulations made thereunder)

Report to: An Bord Pleanála
Type of Consultation: EIAR
Planning Authority: Fingal County Council
Reference Number: An Bord Pleanála PL06F.304624
EHIS Reference Number: 0951
Applicant: Fingal County Council

Proposed Development: Fingal County Council is making an application for approval to An Bord Pleanála to carry out a proposed development consisting of a new greenway (shared footpath and cycle path) approximately 6km in length, between Malahide Demesne and Newbridge Demesne, in the townlands of Malahide Demesne, Malahide, Kilcrea, Newbridge Demesne and Donabate, Fingal, County Dublin, to be known as the Broadmeadow Way.

The principal elements of the proposed greenway include the following:

- Use of c. 900m of existing pathways within Malahide Demesne, extending from the main car park located southeast of Malahide Castle to the Hogan's Gate entrance on the R106, Dublin Road, including new route signage and bicycle parking facilities.
- Approximately 140m of new footpath construction at Bridgefield car park, Malahide Demesne, and new ramp/access upgrade works at the existing pedestrian entrance leading to the R106 Dublin Road.
- Reconfiguration of c. 220m of the R106 Dublin Road between Bridgefield car park and O'Hanlon's Lane to facilitate the provision a new off-road shared pedestrian and cyclist facility along the northern side of the road, and a new signal controlled crossing.
- Approximately 135m of road resurfacing, 230m of shared surface road markings, signage and boundary hedge trimming along O'Hanlon's Lane.
- The reconfiguration of the junction of Bissets Strand and O'Hanlon's Lane.
- Two signal controlled crossings and new traffic signals at the railway bridge on Bissets Strand.
- The construction of approximately 260m of off-road shared pedestrian and cyclist facilities and associated landscaping and ancillary works on Bissets Strand.
- Works to facilitate a new greenway some 615m in length along the existing weir maintenance access track on the western embankment of the Dublin-Belfast railway causeway, extending north from Bissets Strand into Malahide Estuary, to include new surfacing, fencing, boundary walls, local stone fill, route lighting and signage, and a viewing area.
- Provision of a new 12-span bridge deck of approximately 180m in length on the existing piers located alongside the Dublin-Belfast railway bridge situated on the weir in Malahide Estuary.
- Works to facilitate a new greenway of approximately 1,000m in length along the shoulder of the western embankment of the Dublin-Belfast railway causeway, from the railway bridge on the weir in Malahide Estuary extending as far as the northern shoreline of Malahide Estuary at Kilcrea, to include new surfacing, fencing, boundary walls, local stone fill, route lighting and signage.
- Provision of c. 910m of new greenway along the western side of the Dublin- Belfast railway through agricultural lands in Kilcrea on the north side of the estuary, between the northern shore of Malahide Estuary and the L-6165-0 Coast Road/Corballis Road, with works to include new surfacing, fencing, route lighting, landscaping/planting and signage, and a new three span bridge over the Pill River (50m) constructed in concrete and timber.
- Provision of c. 230m of new greenway along the southern side of the L-6165-0 Coast Road/Corballis Road, Kilcrea to include surfacing, fencing, route lighting, landscaping/planting and signage.
- Upgrading and re-alignment along c.450m of the L-6165-0 Coast Road/Corballis Road adjacent to the Dublin-Belfast railway bridge, including the installation of signal-controlled pedestrian and cyclist crossing points.
- Provision of c.370m of new greenway, including a single span (12m) shared footpath and cycle path bridge crossing of the Pill River constructed in concrete and timber, through agricultural lands in Kilcrea and along the southern bank of the Pill River.
- Crossing of the newly constructed Donabate Distributor Road and the pedestrian lights for same.
- Resurfacing works along c.140m of the existing L-6135-0 Kilcrea Road north to the R126 Hearse Road.

- Reconfiguration of the junction of the L-6135-0 Kilcrea Lane and the R126 Hearse Road to facilitate pedestrian and cyclist access to Newbridge Demesne.
- Use of approximately c.900m of existing pathways including new route signage and bicycle parking at Newbridge Demesne.
- Ancillary works along the route including drainage works, provision of fencing, boundary treatments, agricultural accesses, noise barrier (close to the Donabate Distributor Road), public lighting, landscaping and other minor works.

The following HSE stakeholders were made aware of the application on June 11th 2019:

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher/Laura Murphy
- CHO – Mellany McLoone

General Introduction

This report only comments on Environmental Health impacts of the proposed development as outlined in this EIAR and the adequacy of the EIAR from the Environmental Health viewpoint. The Environmental Health Service has made observations and submissions on the following specific Environmental Health areas:

1. Assessment of principle and description of the project

The EIAR prepared on behalf of Fingal County Council has detailed the requirement for, and the benefits of, developing the proposed greenway. It refers to a number of national, regional and local policies and strategies which support and encourage the development of cycle ways and greenways.

The EIAR which accompanies the application to An Bord Pleanála provides a detailed description of the proposed development to provide a new greenway (shared cycle and pedestrian path) between Malahide Demesne and Newbridge Demesne. (Broadmeadow Way) The extent of the work is described in Chapter 3 'Project Description'.

The proposed works are summarised in a concise manner in 'Volume 1 Non-technical Summary'. Each aspect of the proposed development is detailed in the EIAR and accompanying plans and drawings.

The Environmental Health Service (EHS) notes the requirement for the development of a greenway and welcomes the proposed development, which will have a positive impact on the physical and mental health of those who use it. As stated in Chapter 4.1.2 of the Non-technical Summary ('Population and Human Health') *'for people living in Dublin and Leinster, the amenity provided by the proposed greenway is a significant positive impact as no similar facility exists close to the capital'*

2. Assessment of later consents

From information provided in the EIAR relating to emissions to air (including noise, vibration and dust), emissions to surface water and emissions to ground water, it is not anticipated that any Later Consents will be required.

Chapter 8 'Water' indicates that there will be no potential significant impacts and effects on the hydrogeological environment during either the construction or operational phase of the proposed development. The potable water supply will not be affected by either the construction or the operation of the proposed greenway. Chapter 16.5 details the measures to be undertaken by the contractor to ensure that the quality of both surface and ground water will be protected during the construction phase of the project.

Chapter 3.13.15 states that wastewater from holding tanks serving the construction staff welfare facilities will be collected by an appropriate licensed contractor.

The construction and operation of the proposed Broadmeadow greenway will have no effect on the foul drainage system with regards to either the capacity or the need for additional toilet facilities. Existing toilet facilities are available to users of the proposed greenway at both Newbridge Demesne and Malahide Demesne. It is not anticipated that the additional numbers using the greenway will affect the existing foul drainage system. (Chapter 11.3.12)

Chapter 3.13.15 provides some detail regarding the preliminary Construction Environmental Management Plan. CEMP 8: Waste Management indicates that wastes arising from the construction process will be recycled and reused within the project, wherever possible. Residual waste will be disposed of to a licensed waste disposal facility. *Although it is stated that waste arising from operation is not anticipated, consideration should be given to the provision of a number of general waste and recycling bins along the route.*

3. Assessment of Public Consultation and Non-Technical Summary

Chapter 1.2 of the Broadmeadow Way EAIR details that a number of statutory agencies were consulted during preparations for the proposed development.

The extent of public consultation is outlined in Chapter 1.2 'Stakeholder Consultation'. It is noted that Fingal County Council hosted two public consultation events on February 25th and March 5th 2014, with representatives of the Council, the project design team and environmental specialists attending. In addition, a month long exhibition, with a consultation brochure and drawings of proposed routes were displayed in three locations during this time.

One hundred and one questionnaires were returned to Fingal County Council by the deadline of 28th March 2014. In addition, 30 written submissions were received from interested parties. (Volume 4B, Chapter 9 Non-statutory consultation).

As considerable time has passed since these events, the Environmental Health Service recommends that local residents receive regular updates on the progress of the construction of the greenway by means of posters, articles in local newspapers and through appropriate social media channels.

In addition, it is recommended that a member of the contractor's team has specific responsibility for keeping sensitive receptors informed about specific aspects of the work which may impact them and for dealing with complaints and queries from local residents and members of the public.

The EIAR Non-technical Summary Volume 1 provides a concise, clear summary of the EAIR process, then proposed development and its potential significant impacts on human health. The Environmental Health Service notes that statutory agencies were consulted and extensive public consultation has been undertaken to date.

4. Assessment of Consideration of Alternatives

Alternative route options are considered in Chapter 2 'Policy Background and Alternatives'. Alternative routes to the final proposed greenway route were examined and the reasons for discounting these routes are described in detail in Chapters 2.3, 2.4 and 2.5 and summarised in Table 2.3 'Summary Table of Preferences'

The Environmental Health Service is satisfied that the EIAR outlines the requirement to undertake work to provide a greenway between Malahide Demesne and Newbridge Demesne and that the reasons for choosing the proposed routes have been detailed in the EIAR.

5. Assessment of the Physical Environment

The Environmental Health Service notes the predicted positive impact which the proposed greenway will provide for cycling, walking and bird watching and the link which it will provide between the towns of Malahide and Donabate. The greenway will provide a more direct route between the two towns for those cycling to work.

The benefits of using the greenway to the physical and mental health of users are outlined in this section of the EIAR. In addition to meeting the objectives of the various policies and strategies outlined in Chapter 2, the proposed greenway will provide an opportunity for Fingal County Council to contribute towards meeting the aims of the Healthy Ireland Framework 2013-2025, in particular Goal 4 '*Create an environment where every individual and sector of society can play their part in achieving a healthy Ireland*'

Section 4.2.1 of the Non-technical Summary ('*Residential and Journey Amenity*') acknowledges that there may be some minor inconvenience during the operational phase of the proposed development with extra pedestrian numbers in Malahide especially during the summer months. Noise during the construction phase of the project will entail some minor impacts to residents along the route of the greenway. There will also be minor impacts to traffic flow in some parts of the route.

The Environmental Health Service is of the opinion that mitigation measures contained in Chapter 3.13.16, which will be adopted by the appointed contractor, in addition to a detailed Construction Noise Management Plan (CEMP 9) are adequate to protect public health.

6. Land, Soil and Water

In assessing the description of land and soil, the EIAR describes the site of the proposed greenway as '*low lying and coastal*' with '*small sporadic eskers, rising to a few meters in height*'. There are a number of small streams in the area which drain towards Malahide estuary. 'Locally important

aquifers' have been identified at a number of locations along the route. The Environmental Health Service notes the statement in Chapter 8.1.3 (*Water: Data and Methodology*) that *'construction relating to the proposed route will not occur in areas of high and extreme vulnerability. The removal of soils and subsoils material during the construction will not give rise to an increase in aquifer vulnerability.'*

Chapters 8.1.7 and 8.1.8 indicates that no private (third party) wells which are used to supply drinking water to homes or businesses have been identified along the construction route. Although it is unlikely that the contractor will become aware of any such wells during construction of the greenway, the EHS is aware that not all wells are included on the GSI well database. It is therefore recommended that if wells are identified the water quality should be tested against the parameters specified in the Drinking Water Regulations (SI No. 122 of 2014) before work starts, during the course of the works and once in the year following completion of the works.

Due to an increase in hard surface areas, as a result of the macadam surface finish (Chapter 3.2.3) there will be an increase in rainwater run-off. The EIAR states that the contractor's design of the drainage system will ensure that this run-off will be collected in a controlled manner. It is noted that the design of the drainage system will incorporate the principle of Sustainable Urban Drainage System (SUDS) and that local and national guidance relating to surface water run-off rates will be complied with.

Chapter 8.1.21 '*Hydrocarbon leakage/spillage*' identifies the potential for the possible contamination of groundwater by leakage or spillage from construction machinery and equipment. Mitigation measures outlined in Chapter 8.1.24 to 8.1.35 '*Mitigation Measures – Construction Phase*' if implemented in full by the appointed contractor, are acceptable to the EHS as measures to adequately protect public health.

7. Flood Risk

The EIA identified the potential risk of flooding of the proposed Broadmeadow Way greenway, and acknowledged that most of the site lies within two Flood Risk Zones. A Flood Risk Assessment Report is included in Volume 4C, Appendix 17 of the EIAR. The main flood risk to the proposed development is from coastal flooding. The EIAR outlines the design approach adopted for the proposed greenway to minimise the impact of flooding. The EHS is satisfied that sufficient measures have been identified to mitigate risks to public health from any flooding event on site.

8. Air Quality – Dust

The EIAR details available background air quality data for the Malahide and Donabate areas. There is potential for emissions to the atmosphere during the construction phase of the proposed development. Construction of the greenway may generate dust. Due to the nature of potential dust-generating activities (earth moving and excavating) it is unlikely that these activities will result in the generation of dust particles less than 10 microns. (Chapter 9.4.5)

As the proposed greenway will be constructed on a phased basis, dust emissions are not predicted to be significant. Chapter 9.5 outlines the mitigation measures to be implemented by the main contractor to prevent significant dust emissions, including

- Implementing a Construction Dust Management Plan (CEMP 10)
- Regular cleaning of site roads
- Sweeping of hard surface roads
- Watering roads during dry/windy conditions

- Restricting construction vehicle speeds
- Covering vehicles transporting loose materials with tarpaulin and
- Regular inspection and cleaning of public roads.

It is noted on the Proposed Site Compound Drawing (12.160.243) that a wheel wash will be positioned at the access to the site compound.

The Environmental Health Service is satisfied that if all the mitigation measures outlined in Chapter 9.5 '*Mitigation Measures*' and due to be detailed by the appointed contractor in CEMP 10 '*Construction Dust Management Plan*', are stringently implemented, the residual risks to the public are acceptable.

9. Air Quality-Noise and Vibration

The EAIR refers to the Code of Practice for Noise and Vibration Control on Construction and Open Sites (B.S 5228 2009 + A1 2014) to set construction noise limits for the proposed site during the construction phase of the greenway.

Baseline noise levels have been assessed at various locations in the vicinity of the proposed route. Noise sensitive receptors are mainly the occupants of residential houses located in Malahide, at the southern end of the proposed greenway.

Construction Noise

The nature of construction activities can lead to short term excessive noise exposure for populations and the Environmental Health Service therefore recommends that the hours of permitted construction activity is limited to

Monday to Friday 07:00 – 19:00
 Saturday 08:00 – 13:00
 Sundays and Public Holidays – No work on site

Any work outside of these hours should be exceptional and only be at the explicit permission of the Planning Authority. Details of noise mitigation measures should be detailed in the '*Construction Noise Management Plan*' (CEMP 9). **The Environmental Health Service recommends that the contractor should identify an employee with responsibility for giving 24 hour advance notification to sensitive receptors in advance of critical phases of the work and to deal with complaints and queries from residents and members of the public regarding issues arising during the construction works.**

Operational Noise

It is not anticipated that the day to day activities associated with the proposed greenway will have any significant noise or vibration impact on sensitive receptors within the proximity of the proposed greenway.

10. Pest Control

The Environmental Health Service was unable to locate any reference to pest control measures to be implemented by the contractor during the construction phase of the scheme. The control of pests on site is essential both for the safety of construction workers and to protect nearby homes. Pests, such as rats, are found close to rivers and it is likely that rats will be encountered during the project. Chapter 6.4.68 of the EIAR (*'Mammal Survey'*) notes that brown rats were observed along the proposed greenway route, both on the railway embankment and in fields and hedges.

Construction activities that can cause open wounds or that take place near the water's edge where rat urine is more likely to be found increases the risk of contracting Weil's Disease, which is a bacterial infection carried by rats. It can be contracted by humans through contaminated fresh water (RoSPA, 2008)

It is recommended that a Pest Control Plan is incorporated into the final Construction Environmental Management Plan.

Recommended Pest Control Measures include:

1. A site survey by a professional Pest Control company should be undertaken at least four weeks prior to works commencing to identify evidence of pest infestations. Where infestations are identified, appropriate treatments must be implemented to eliminate infestations prior to works commencing. Information obtained on Biodiversity during the EIA process may be used for this purpose.
2. Care should be taken by the contractor not to damage drains or sewers when using machinery, as this can provide an access route for rats onto the site.
3. Old redundant sewers and drains should be capped and removed where possible and 'live' sewer connections should be appropriately sealed and capped while construction works are in progress to prevent rat egress from the sewers.
4. Pest monitoring and surface baiting should be undertaken on site during demolition/construction works.
5. Contractors should ensure that the construction site is kept as clean and tidy as possible, and any food debris should be stored in a pest proof container within the welfare facility.
6. Construction workers should be made aware of the risks associated with rodents, especially rats, and should wear suitable PPE. They should also adopt good hygiene practices, such as covering open skin wounds and washing their hands on removing safety gloves and prior to eating.

11. Assessment of Interaction of the above Impacts

The Environmental Health Service notes that the EIA assessed cumulative impacts of the proposed greenway development in respect of the existing environment. Chapter 15 of the EIAR describes the significant interactions of impacts identified in the EIAR.

Significant interactions were assessed under a number of headings

- Population and Human Health

- Traffic and Transportation
- Biodiversity
- Land and Soil
- Water
- Air and Climate
- Noise and Vibration
- Material Assets
- Archaeology and Cultural Heritage
- Architectural Heritage
- Landscape

The construction, operational and cumulative impacts have been assessed under each of these headings. The Environmental Health Service has reviewed the potential impacts and the mitigations proposed under the headings which are of relevance to public health and is of the opinion that mitigation measures outlined are adequate to protect public health. The Environmental Health Service emphasises the requirement to ensure that all mitigation measures proposed are implemented by the developer.

All correspondence or any queries regarding this report, including acknowledgement of this report, should be forwarded to Environmental Health National Office, at the above address.



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