

Fingal County Council  
Planning Department  
County Hall, Main Street  
Swords  
Co. Dublin

5<sup>th</sup> March 2021

Dear Sir/Madam,

**RE: ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR) SCREENING – FOR THE PROPOSED ‘BREMORE REGIONAL PARK DEVELOPMENT PROJECT’ AT BREMORE REGIONAL PARK, BALBRIGGAN, COUNTY DUBLIN**

## **1.0 INTRODUCTION**

### **1.1 Purpose of this Report (EIAR Screening)**

Tom Phillips + Associates (TPA), Town Planning Consultants has been engaged by Áit Urbanism + Landscape Ltd to review a proposed development project in order to reach a conclusion as to whether it should be subject to Environmental Impact Assessment Report (EIAR), or not.

This (EIAR) Screening is in respect of proposed ‘public park improvements’ (proposed development project) at the existing Bremore Regional Park, Balbriggan, County Dublin. The site is located within the administrative area of Fingal County Council.

The purpose of this Report is to provide:

- i. An assessment of the proposed development in the context of the relevant thresholds for this form of development project, which require the preparation of a mandatory Environmental Impact Assessment Report (EIAR);
- ii. An assessment of sub-threshold considerations for the proposed development, and;
- iii. An outline of the scope and content of the proposed Planning Application including all relevant assessments, which we propose to submit in lieu of a formal EIAR regarding the proposed development.

This Report has had regard to the *EIA Guidance for Consent Authorities regarding Sub-threshold Development* (guidance), which was published by the then Department of the Environment, Heritage and Local Government in August 2003. We have also considered the provisions of the *Environmental Impact Assessment of Projects (EIAR) Guidance on Screening* published by the European Union in 2017. The Screening Checklist included in that document is enclosed as Appendix A to this Report.

TOWN PLANNING CONSULTANTS

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## 1.2 The Subject Site and Development Description

### *Description of the Subject Site*

The subject site is located in the existing the 'Bremore Regional Park'. The park is approximately 43.5 hectares in its entirety and encompasses the coastal area located to the north of Balbriggan, Co. Dublin. The project site area is 15.07 hectares.

Bremore Park extends north from Balbriggan Harbour to agricultural lands on the northern edge of the town. It comprises of Balbriggan Beach, various sports playing fields, agricultural grassland and amenity grassland. Balbriggan Football Club, Balbriggan Martello Tower, Bremore Castle and the RNLI boathouse are situated within the boundaries of the site.

The Dublin to Belfast railway line transverses the site on a north to south axis. See Figure 1.1 below for details.



Figure 1.1: Location of Subject Site (Source Aerial Photograph provided by Ait Landscape + Urbanism by email dated 10th November 2020, cropped and annotated by Tom Phillips + Associates).

### ***Description of the Proposed Development***

Residential development, mainly in the form of standard semi-detached housing, is located along the western site boundary, whilst agricultural lands extend beyond the northern edge of the site. The Irish Sea shoreline bounds the extent of the eastern perimeter, with extensive views to the sea possible from the majority of the site.

The overall parkland is rich in archaeology and architectural heritage, with a number of archaeological landmarks and Protected Structures situated throughout the site. In respect of the rich built heritage of the lands, we refer to the Conservation Report completed by Howley Hayes Architects, which provide a further assessment of these historic structures.

The proposals are intended to be delivered through a Part VIII application process, driven by Fingal County Council.

The proposed development comprises the following elements:

#### **The Balbriggan Sports & Recreational Hub and main ancillary infrastructure**

- 8 Lane Athletics Track (All weather surface)
- 1 no. All Weather (3g Surface) Pitch, 100m x 60m
- 1no. 5-a-side side All Weather (3g Surface) Pitch 40m x 25m
- 2no. 9-a-side football pitches, 70m x 50m
- 3no. Basketball courts 28m x 16m
- 2no. Tennis Courts 24m x 11m
- 1 no. GAA Pitch 145m x 90m
- Bleacher seating structures
- Sports enclosure fencing
- Primary Circulation Network

#### Main ancillary infrastructure:

- Changing & Toilets Building
- Vehicular Access from R132
- Bicycle Parking:

#### Landscaped Car Park and Associated Car Parking:

- 50no. Standard Car Spaces
- 3no. Universally Accessible Spaces
- 1no. Coach Set Down
- Associated Foul/ Fresh Water & ESB Connections and Fibre Optic Communications Connections

#### Proposed Sports & Recreational Hub Lighting:

- Public lighting of primary circulation network
- Public lighting of car park
- Sports lighting
- 8m & 12m high columns to sports courts
- 18m & 20m high columns to athletics track & all weather Pitch

### **The Central Zone Open Spaces**

- Natural play elements
- Outdoor gym equipment and other park furniture elements
- Resurfacing and landscaping works
- Provision of over flow parking:
  - 50no. spaces on reinforced grass surface
- Signage, seating
- Bicycle Parking:
  - 13 no. 'Sheffield' type Bicycle Stands
- Public Lighting of select, primary circulation routes including associated ducting and ducting for future fibre optic connections

### **The Coastal Park**

- Basketball Half Court
- Skate Bowl
- Structural Planting (Trees & Shrubs)
- Amenity planting and grass mounds
- Paving surface treatments
- Terraced steps/ seating
- Bicycle Parking:
  - 25 no. 'Sheffield' type Bicycle Stands

### **Landscaped Car Park and Associated Car Parking**

- 98no. Standard Car Spaces
- 6no. Universally Accessible Spaces
- Resurfacing and landscaping works
- SuDS Installation
- Removal of private car access to coastal car park area & relocation of 19 no. existing car parking space
- Bicycle Parking:
  - 18 no. 'Sheffield' type Bicycle Stands

### **Park boundaries**

- 1.8m High Steel Railing
- 1.8m High Stone Wall and Railing

[Note: The above list of improvement works was provided by Áit Urbanism + Landscape Ltd within a document entitled 'Bremore Regional Park Development Project – Part 8 Planning Application (dated March 2021) (210302), and is the subject of this EIAR Screening. A detailed description of the works is set out under Section 4.1.1 'Part 8 Development Project – Landscape Design Proposals', and we confirm we have reviewed this information prior to completing this EIA Screening Report. We note also that the AA Screening Report accompanying the Part VIII Application lists the full list of works under Section 3.2 of that report.



This EIA Screening Report therefore has been prepared on the basis of these proposed works. We understand that these are part of the initial package of improvement works and there is no intention to develop any part of the coastal environment or beach as part of this phase of development.

The proposed works will remain fully outside of the foreshore area, which is not within the remit of Fingal County Council and would require a separate consent process if that were the case.

### 1.3 Summary

In summary, having regard to the relevant thresholds set out in Schedule 5 of the *Planning and Development Regulations 2001 (as amended)* regarding mandatory EIS (now EIAR) provision for this form of development, the subject proposal does not comprise a sub-threshold development, in our opinion. This is because the proposal does not fall into any of the prescribed project types (see Section 2.2 below).

Secondly, according to the *EIA Guidance for Consent Authorities regarding Sub-threshold Development, August 2003*, a formal EIAR would not be required for this particular development. This is due to the characteristics of the proposed development, its locational characteristics, and the fact that the proposal is unlikely to generate any significant environmental effects.

Thirdly, while it is considered that a formal EIAR is not required in this instance, it is noted that detailed and comprehensive assessments, as required, have been prepared and will accompany the Part VIII application, have assessed and addressed all of the relevant potential planning and environmental issues pertaining to the subject development.

These assessments have informed the development responses to the specific issues raised by development within the site. The assessments referenced in Section 2.0 below are designed to address the issues raised by this type of development and provide the requisite levels of environmental assessment to the appropriate standards.

## 2.0 STATUTORY INSTRUMENTS

### 2.1 Schedule 5 of the *Planning and Development Regulations 2001 as amended*

#### *The Legislative Basis for EIA*

Part X of the *Planning and Development Act 2000* (as amended) provides a basis in primary legislation for EIA. Part X of the Act establishes a framework for EIA with the detail provided in Schedules 5, 6 and 7 of the *Planning and Development Regulations 2001*, as amended ('the Regulations').

Part 1 of Schedule 5 to the *Planning and Development Regulations* lists projects included in Annex I of the Directive which automatically require EIA. Part 2 of the same Schedule outlines thresholds for other projects which also require EIA, per Annex II of the Directive. Therefore, both are an important reference point in the context of establishing the threshold for EIAR preparation.

#### *Class of Development*

In terms of the different categories of development listed in Schedule 5 of the Regulations, the subject development relates to Part 2(10)(b)(ii) and (iv) of the *Planning and Development Regulations 2001* as amended regarding '*Infrastructure Projects*' respectively and provides the relevant area/development thresholds as follows:

##### *10. Infrastructure projects*

- *(b) (ii) Construction of a car-park providing more than 400 spaces, other than a car-park provided as part of, and incidental to the primary purpose of, a development.*
- *(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.*

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

Response: The car-parking provision is incidental to the main purpose of the development. Therefore, class 10(b)(ii) is not applicable. (Note: Emphasis / underlining above added by TPA.)

The EU Guidance on '*Interpretation of definitions of project categories of annex I and II of the EIA Directive*' (2015) interprets "'urban development' as taking 'account of, inter alia, the following:

- (i) Projects with similar characteristics to car parks and shopping centres could be considered to fall under Annex II (10)(b). This could be the case, for example, of bus garages or train depots, which are not explicitly mentioned in the EIA Directive, but have similar characteristics to car parks.*
- (ii) Construction projects such as housing developments, hospitals, universities, sports stadiums, cinemas, theatres, concert halls and other cultural centres could*



*also be assumed to fall within this category. The underlying principle is that all these project categories are of an urban nature and that they may cause similar types of environmental impact.*

*(iii) Projects to which the terms ‘urban’ and ‘infrastructure’ can relate, such as the construction of sewerage and water supply networks, could also be included in this category.*

*Projects for integrated urban transport schemes (e.g. parallel works at different locations to upgrade bus lanes, tramlines, bus, tram and/or metro stops), could also fall under this project category.”*

Response: Having regard to the above, the characteristics of the proposal do not correspond with, and are not comparable to, any of these descriptions. As outlined in Section 1.2 above, the extent of new works comprises a programme of works which are minor in nature. The characteristics of the proposal are such that they mainly involve upgrades to existing facilities and park infrastructure only. Where new facilities are proposed, these comprise mainly park furniture, such as seating, signage, litter bins, lighting, all-weather running tracks, outdoor exercise equipment, etc.

The works relate to certain, localised elements of the park and do not apply to its full 43.5 ha. The project site area is 15.07 hectares. In this respect, only a fraction of the overall parkland’s physical space would be subject to any work, with the large majority of it remaining unaffected by the subject proposal. In addition, we confirm that there is no intention to develop any part of the coastal environment or beach, which will remain unaffected by the proposed development.

Having regard to this, class 10(b)(iv) is not applicable, and a mandatory EIAR is not required on this basis. (This is further borne out by the EIAR Screening Checklist, see Appendix A.)

## **2.2 EIA Guidance for Consent Authorities regarding Sub-threshold Development**

As the proposal does not fall into any of the prescribed project types it cannot be considered to be ‘sub-threshold’ development.

Having regard to the ‘wide scope and broad purpose’ of the Directive it is nonetheless appropriate to consider if it is likely to cause significant environmental impacts by reference to the relevant criteria for determining same, as set out in Schedule 7 of the Planning and Development Regulations, as amended.

Schedule 7 specifies ‘Criteria for determining whether a development would or would not be likely to have significant effects on the environment’ under these three headings:

- (i) Characteristics of the Proposed Development:
  - a) the size of the proposed development;
  - b) the cumulation with other proposed development;
  - c) the nature of any associated demolition works;
  - d) the use of natural resources, in particular land, soil, water and biodiversity;
  - e) the production of waste;
  - f) Pollution and nuisances;
  - g) the risk of major accidents;

h) the risks to human health.

(ii) Location of Proposed Development:

The environmental sensitivity of geographical areas likely to be affected by the proposed development, having regard in particular to:

- a) the existing and approved land use;
- b) the relative abundance, availability, quality and regenerative capacity of natural resources; and
- c) The absorption capacity of the natural environment;

(iii) Types and Characteristics of Potential Impacts.

The likely significant effects on the environment of the proposed development in relation to criteria set out under paragraphs 1 and 2 (as above), and having regard to;

- a) the magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected),
- b) the nature of the impact,
- c) the transboundary nature of the impact,
- d) the intensity and complexity of the impact,
- e) the probability of the impact,
- f) the expected onset, duration, frequency and reversibility of the impact,
- g) the cumulation of the impact with the impact of other existing and/or development the subject of a consent for proposed development #
- h) the possibility of effectively reducing the impact

The table set out in Appendix A of this Screening Report sets out these considerations in more detail against both the main and sub-criteria which are specified in Schedule 7.

The guidance also advises that particular attention should be paid to projects which are 'close to the national statutory thresholds', which is not the case here as illustrated above.

### 2.2.1 Characteristics of the Proposed Development

The six sub-criteria which the guidelines identify as being important in terms of the characteristics of the proposed development are set out below. The relationship between the proposed development and each of these criteria is detailed below. (An amendment to the Regulations in 2008 referenced 'the nature of any associated demolition works' as being a relevant characteristic for assessment.

On the basis that no significant demolition is proposed as part of this development, this is not considered a relevant assessment issue regarding the subject proposal.)

a) Size of the Proposed Development

The subject site comprises the existing the 'Bremore Regional Park'. The park is approximately 43.5 hectares and encompasses the coastal area located to the north Balbriggan, Co. Dublin. The project area however is 15.07 hectares.



The proposed development comprises physical improvements to the Park that will significantly improve its usability and quality as a public open space. The improvements are for recreational and amenity purposes. The full physical extent of the proposed works are shown in Figure 1.1 above.

The likely effects from the size of the project are therefore not significant.

*b) the cumulation with other proposed development;*

The proposed development is located on a site that is zoned 'Open Space' and 'High Amenity' under the *Fingal Development Plan 2017 – 2023*. Having regard to the nature and scale of development that is proposed (construction of new and replacement park facilities), it is considered that the potential for cumulative environmental impacts does not arise in this instance. I.e. The proposed development is generally seeking to upgrade / improve an existing regional park.

Furthermore, having regard to the relevant thresholds set out in Schedule 5 of the *Planning and Development Regulations 2001 (as amended)* regarding mandatory EIAR provision for this form of development, the subject proposal does not comprise a sub-threshold development, in our opinion.

Furthermore, all appropriate environmental assessments have been undertaken in support of the development proposal (see Section 2.2.3 below), which demonstrate that no significant environment impacts will arise on foot of the proposed development.

*c) the nature of any associated demolition works;*

It is envisaged that no demolition works of note will take place arising on foot of the development proposal.

*d) the use of natural resources, in particular land, soil, water and biodiversity,*

The proposed development will not involve a significant use of natural resources. Small amounts of stone, gravel, timber will be used for pathways and base material for construction purposes. However, this is relatively small quantities and not considered to be relevant consideration in terms of the subject proposal.

*e) the production of waste,*

The production of waste is not considered a primary characteristic of the proposed development. Waste Management will be addressed as part of the planning application (Part VIII) and will be integrated into the overall management regime for the development by Fingal County Council.

A site-specific Construction and Environmental Waste Management Plan (CEMP) has been completed which addresses this issue in further detail. The CEMP confirms that any necessary excavation works will follow a series of control measures to ensure the safety of work in excavations onsite and to ensure works will not cause any significant impact.



Pollution and nuisances,

As with the production of waste, pollution and nuisances will not be primary characteristics of the proposed development. It is proposed that assessments of, *inter alia*, Conservation, Landscape, Ecological, Public Realm, Flooding, and Traffic and Transportation Impact will be fully assessed by separate studies and reports, and form part of the application (Part VIII Application by Fingal County Council).

Furthermore, potential for the creation of dust, noise and vibration has been addressed by the CEMP. The CEMP notes that any construction works that could potentially result in such impacts will follow a series of control measures to ensure works will not cause any significant impact.

f) the risk of major accidents,

It is proposed that the risk of accidents, having regard to substances or technologies used, will be extremely low in this case, given the nature of the development (regional park)

g) the risks to human health

Effects are anticipated to be limited to increased visitor traffic to the area. However, this is expected to be minimal in that the park is not expected to see a significant increase in users due to the nature of improvements that are proposed. No impact arising from wastewater or to air quality is envisaged due to the nature and scale of the project.

## 2.2.2 Location of the Proposed Development

In terms of the location of the proposed development, the guidance identifies three sub-criteria which should be considered in the context of the environmental sensitivity of geographical areas likely to be affected:

- *“The existing and approved land use;*
- *The relative abundance, quality and regenerative capacity of natural resources in the area;*
- *The absorption capacity of the natural environment, paying particular attention to the following areas: Wetlands; **coastal zones**; mountain and forest areas; nature reserves and **parks**; areas classified or protected under legislation, including special protection areas designated pursuant to Directives 79/409/EEC<sup>1</sup> and 92/43/EEC<sup>2</sup>; areas in which the environmental quality standards laid down in legislation of the EU have already been exceeded; densely populated areas; and, landscapes of historical, cultural or archaeological significance.”*

The existing land use of the site is an existing park, used by visiting members of the public for recreational and amenity purposes. The proposed development will not alter this, and the current use will remain the same (i.e. a parkland proximate to a coastal zone).

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<sup>1</sup> Council Directive on the conservation of wild birds.

<sup>2</sup> Council Directive on the conservation of natural habitats and of wild fauna and flora.



The County Development Plan includes site-specific Green Infrastructure Objectives (GIM1 and GIM3), which seek to:

- *“Provide new Active Recreation Hubs in **Bremore Regional Park**, St. Catherine’s Park Rush, Lusk, Donabate, Mooretown/Oldtown (Swords), Drinan, Baldoye Racecourse Park, and Phoenix Park Racecourse”.*
- *“Upgrade and enhance Bremore Regional Park, Ward Valley Park, Tolka Valley Park and Millennium Park, Blanchardstown.”*

The relative abundance, quality and regenerative capacity of natural resources in the area will continue to be sustained through efficient management and maintenance of the park. Therefore, the natural resources in the area of the subject site will be unaffected by the proposed development.

The absorption capacity of the natural environment of the proposed development will be addressed in the various assessments enclosed with the Part VIII Application, but this is considered acceptable in terms of existing infrastructure provision being made available to serve the site.

In visual terms, the proposed new build elements have been carefully considered and sited by the Design Team, pursuant to a detailed conservation assessment in terms of some of the finer detail (for example, choice of materials and finishes).

In addition, the subject proposal is sensitively designed to ensure it respects adjoining development and minimises significant visual impact, which is important given the site’s proximity to a sensitive coastal zone.

Allied to the low-lying nature and visual obscurity of much of the new works, it is considered that there is adequate capacity to accommodate the scale of the proposed development from a visual perspective. This is notwithstanding the *‘particular attention’* that is required to be given to the following sensitive areas, that apply in this instance:

- Landscapes of historical, cultural or archaeological significance;
- Coastal zones;
- Nature reserves and parks.

The proposed development is fully consistent with the relevant Landscape Character Assessment Objectives contained in the Development Plan, including the following:

***“Objective NH33***

*Ensure the preservation of the uniqueness of a landscape character type by having regard to the character, value and sensitivity of a landscape when determining a planning application.”*

***“Objective NH34***

*Ensure development reflects and, where possible, reinforces the distinctiveness and sense of place of the landscape character types, including the retention of important features or characteristics, taking into account the various elements which contribute to their distinctiveness such as geology and landform, habitats, scenic*

*quality, settlement pattern, historic heritage, local vernacular heritage, land-use and tranquillity.”*

**“Objective NH37**

*Ensure that new development meets high standards of siting and design.”*

### 2.2.3 Characteristics of the Potential Impacts

As previously outlined in Section 2.2.1 and Section 2.2.2 above, there are no “*significant effects*” (impacts) associated with the proposed development, primarily due to its characteristics (being significantly below all of the appropriate thresholds) and location (within the existing context of a well-established park area, ‘Bremore Regional Park’).

The characteristics of the development are further discussed in ‘Appendix A - EIAR Screening Checklist’, which is enclosed to the rear of this document.

Whilst not comprising an EIAR in the formal legal sense, which we contend is not required in respect of this proposal, the enclosed documents will provide the level of assessment required to an equivalent standard. A brief summary of the inputs to be included is set out below:

- A description of the characteristics of the site location and description of development;
- A detailed analysis of the relevant planning policy guidance at regional and local level;
- Topographical Survey;
- Geophysical and Constraints Survey (Archaeology);
- Site Masterplan and Design Rationale;
- Landscape Rationale;
- Conservation Report;
- Archaeological Assessment;
- Ecology Assessment and Management Recommendations (including review of significant vegetation and species habitats’ review);
- Bat Survey;
- Winter Birds Survey;
- Appropriate Assessment Screening Report (AA Screening);
- Construction Environmental Management Plan (CEMP);



- Drainage and Sanitary Services to be monitored by Fingal County Council on an ongoing basis;
- Lighting Design and Light Spill Report (Sports and Recreation Hub);
- Flood Risk Assessment (Stage 1).

### 3.0 CONCLUSION

It is considered that the proposal does not come within the scope of any class of project prescribed in the Directive or Regulations.

Having considered the nature, scale and location of the proposal, having regard to the characteristics and location of the proposed development, and having regard to the characteristics of potential impacts, it is considered that the project is unlikely to give rise to significant environmental impacts.

This is further supported by the 'Appropriate Assessment Screening Report' which concluded that there will be no negative impacts on the qualifying interests or species of any Natura 2000 site caused by the proposed development. The Report, prepared by James Conroy (Environmental Consultant) concludes that:

*"Based on the location, nature and the zone of impact of potential effects, this screening assessment has concluded that there are no pathways between the proposed development and Natura 2000 sites. Although the presence of protected migratory birds feeding and roosting at locations within eastern areas of amenity grassland and pitches, is considered a direct connection to the relevant Natura 2000 sites, it is considered that the impact of the proposed project at Bremore Regional Park will not be significant.*

*This report concludes that no impacts may be predicted upon any of the Natura sites listed in Table 1. Possible impacts to Natura sites have been screened out and Appropriate Assessment is not recommended."*

It is concluded that there is no requirement for an Environmental Impact Assessment to be carried out for the proposed public park improvements at Bremore Regional Park (Balbriggan, County Dublin).

We trust that this information fully addresses the issue of EIAR screening and that, in this particular case, an EIAR is not required in respect of this development.

Yours faithfully



**Ian Boyle**  
**Associate**  
**Tom Phillips + Associates**



**Appendix A**  
**EIAR Screening Checklist**

<p><b>Questions to be Considered</b> For further guidance on factors to be considered see the more detailed questions listed in the <b>Scoping Guidance</b></p>	<p><b>Yes/ No/? Briefly describe</b></p>	<p><b>Is this likely to result in a significant impact? Yes/ No/?- Why?</b></p>
<p>1. Will construction, operation, decommissioning or demolition works of the Project involve actions that will cause physical changes in the locality (topography, land use, changes in waterbodies, etc.)?</p>	<p>Yes. The development will comprise the construction of new park upgrades and facilities for the new members of the public. However, this is a continuation of a pre-existing land use ('public park'), that has already been established on the site.</p>	<p>No. The site is being used as a public park and this will not be altered by way of the proposed development.</p> <p>The construction phase of the project will have some temporary impacts in the immediate locality, but there will be no long term impacts in terms of land use and visual impact / physical changes in the locality following completion of the development.</p>
<p>2. Will construction or the operation of the Project use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or are in short supply?</p>	<p>No.</p>	<p>No. Some construction materials are likely to be imported. While some of these materials are non-renewable, they are not in short supply. No significant effects on the environment are anticipated.</p>
<p>3. Will the Project involve the use, storage, transport, handling or production of substances or material which could be harmful to human health, to the environment or raise concerns about actual or perceived risks to human health?</p>	<p>No, other than the small amounts typically used for the maintenance and upkeep of the park and that created during the temporary construction phase.</p>	<p>No. The development will be constructed in accordance with best practice and specific controls will be put in place to manage hazardous materials.</p> <p>The CEMP notes that during the construction phase deliveries and removal of waste will be managed daily to ensure the minimum amount of materials and waste are onsite at any time. Materials will be stored in a designated storage area onsite suited to the ongoing works. Vehicle access will be provided along a hard standing area to reduce the amount of construction waste and mud attaching to vehicles. The nominated main contractor/s will ensure the maintenance of</p>



		<p>the public road and footpath, to prevent a build-up of mud or waste being dragged out onto the R132. A combination of washing down vehicles and road sweepers will be utilised.</p> <p>The CEMP provides further construction details.</p>
4. Will the Project produce solid wastes during construction or operation or decommissioning?	No. Whilst the development will require a relatively small amount of excavation works and transport of soil, this is not considered significant in the context of this development.	No. The construction process will result in some generation of waste which will be disposed of in accordance with the provisions of the Construction Waste Management Plan. It is not anticipated that there will be any significant effects on the environment. Operational phase waste will be domestic in nature. Waste will be disposed of by a licensed waste contractor.
5. Will the Project release pollutants or any hazardous, toxic or noxious substances to air or lead to exceeding Ambient Air Quality standards in Directives 2008/50/EC and 2004/107/EC)?	No. The development comprises recreational / amenity upgrade works within the confines of an existing public park that will not give rise to pollutants. Construction activities will be subject to on-site management.	No. The development will be constructed in accordance with best practice and specific controls will be put in place to manage emissions, particularly dust management practices
6. Will the Project cause noise and vibration or the releasing of light, heat energy or electromagnetic radiation?	No. The development comprises recreational / amenity upgrade works within the confines of an existing public park that will not give rise to pollutants. Construction activities will be subject to on-site management to mitigate any short term impacts.	No. The development will be constructed in accordance with best practice and specific controls will be put in place to manage noise and vibration during the construction phases. Transport of construction materials will be necessary but will be subject to normal conditions and working hours to protect existing residential amenity.
7. Will the Project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	No. Construction management will ensure no impacts will affect surface or ground water.	No. During construction, standard preventative measures to avoid any impacts on the local ground and/or surface and ground water environment will be adhered to.
8. Will there be any risk of accidents during construction or operation of the Project that could affect human health or the environment?	No. Best construction practice will mitigate the risk of accidents during the construction stage.	No. Standard preventative measures are provided as part of the project, which will be carried out in accordance with best practice; and specific controls will be put in place to manage risks.



<p>9. Will the Project result in environmentally related social changes, for example, in demography traditional lifestyles, employment?</p>	<p>No. The development will improve the quality and range of recreational amenities available to the public and support the partaking of active and healthy pursuits. No traditional lifestyles or employment will be affected as a result of this development.</p>	<p>No. The increased users of the park is consistent with its existing land use and will not result in significant impacts.</p>
<p>10. Are there any other factors that should be considered such as consequential development which could lead to environmental impacts or the potential for cumulative impacts with other existing or planned activities in the locality?</p>	<p>No. There are no similar, significant planned developments in the area that will give rise to cumulative impacts in tandem with this development proposal.</p>	<p>No. No significant impacts are likely.</p>
<p>11. Is the Project located within or close to any areas which are protected under international, EU, or national or local legislation for the ecological, landscape, cultural or other value, which could be affected by the Project?</p>	<p>Yes. The subject site is located approximately 5.0 km from the River Nanny Estuary Shoreline 'Special Protection Area'. Furthermore, there are numerous other designated sites along the coast north and south of Bremore, both Special Protection Areas (SPA) and Special Areas of Conservation (SAC). These are listed in the Ecology Report. Proximity of the site to these designated areas should be carefully considered during any works scheduled to be carried out at Bremore Park.</p> <p>Bremore Park itself is not designated in European terms as it does not meet the required standards in term of ecological diversity or rarity. Although it does not form part of the Natura Network of European sites (SAC and SPA) it is of substantial value as a coastal habitat.</p>	<p>No. The subject site is physically removed from any SAC/SPA boundary and so there can be no direct impacts to any area designated for nature conservation. The AA Screening Report (March 2021) also confirms that none of the protected Natura sites are connected to Bremore Park, the closest being Skerries Islands SPA to the south (7Km) and River Nanny Estuary and Shore SPA to the north (5Km). The report states that:</p> <p><i>"The report concluded that based on the best available scientific information, demonstrated that the proposed development did not pose a risk of likely significant effects on the River Nanny Estuary and Shore SPA 00415. It also considered that the proposed development does not require progression to second stage Appropriate Assessment.</i></p> <p>Given the type of works that are proposed, and the relative distance from designated areas, it is not envisaged that any of these areas would be affected by the proposal. Whilst the project could potentially affect an area one of</p>



		<p>the types of areas referenced in Question 11, this is considered unlikely, and as noted above, a similar finding has been confirmed by the AA Screening Report.</p> <p>No impacts are expected to occur to water quality during the operation phase. During the construction phase good site practice will ensure that impacts are minimised to the greatest degree possible. The Construction Management Plan prepared by Ait Landscape + Urbanism and Fingal County Council sets out a series of measures and procedures to be followed to ensure the minimal impact of the construction activities on the surrounding residential communities and the general public.</p> <p>Based on the location, nature and the zone of impact of potential effects, this screening assessment has concluded that there are no pathways between the proposed development and Natura 2000 sites (see AA Screening Report for further details.)</p> <p>For these reasons, it is considered that negative effects to the SAC or SPA are unlikely to occur</p>
<p>12. Are there any other areas on or around the location that are important or sensitive for reasons of their ecology e.g. Wetlands, watercourses or other waterbodies, the coastal zone, mountains, forests or woodlands that could be affected by the Project?</p>	<p>Yes. The site adjoins an environmentally sensitive area on its eastern boundary, which is a coastal zone and beach. However, as confirmed by the Appropriate Assessment Screening Report, it is unlikely that any impact would be significant.</p>	<p>No. The site itself has not been significantly modified over time and is utilised by various user groups, such as walkers, cyclists, sports clubs etc.</p> <p>In addition, given the nature of the proposed works, which are modest and largely involve replacing existing facilities and infrastructure, it is unlikely any significant impacts will be experienced by surrounding locations.</p>
<p>13. Are there any areas on or around the location that are used by protected,</p>	<p>Yes. This is confirmed in the Ecological Assessment, Winter Birds Survey, Bat Survey and AA</p>	<p>No. A Bat Survey and AA Screening Report have been undertaken/prepared in respect</p>



<p>important or sensitive species of fauna or flora eg. For breeding, nesting, foraging, resting, overwintering, migration which could be affected by the project?</p>	<p>Screening Report that has been prepared.</p> <p>The AA Screening notes that there is no land connection between Bremore Park and any of the protected Natura sites; the closest being Skerries Islands SPA to the south (7Km) and River Nanny Estuary and Shore SPA to the north (5Km). It is not anticipated that there will be any direct impact on the Natura sites as a result of the proposed developments at Bremore due to the nature of the proposed works, which can be categorised as 'park improvement works' as well as distance from the site itself.</p>	<p>of the site. These respective reports outline the ecological value of the site and confirm that the proposed development will have a minimal impact from this perspective. In relation to the bat survey, we note that the AA Screening Report (Page 13) states:</p> <p><i>"A Bat survey and assessment was carried out in September 2018, October/November 2019, and September 2020 by Brian Keely BSc. Three species of bat were recorded: Leisler's Bat, Soprano Pipistrelle and Common Pipistrelle (each of which are Annex IV of the Habitats Directive - covering species in need of strict protection).</i></p> <p><i>Bat activity was noted around the Castle yard, along the hedgerows and in the grassland around the sports pitches. <b>There were no bat roosts recorded although the report states that, 'It is possible that all three species are roosting in close proximity to Bremore Castle'.</b></i></p> <p>In relation to the presence of winter birds, the AA Screening Report (Section 2.3.3 ) states that:</p> <p><i>Birdwatch Ireland were commissioned to undertake a 'Winter bird survey of farmland and parkland at Balbriggan, North County Dublin' Nov 2020, covering the farmland and parkland along the coastline from Balbriggan to the Delvin River. The report is divided into 5 areas – A,B,C,D and E.</i></p> <p><i>Sections B and C are within the scope of the current project area; B corresponds to the northern agricultural fields and C correspond to the amenity parkland.</i></p>
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		<p>The AA Screening Report has therefore completed a thorough winter bird survey, which has ultimately led to an informed Screening Decision as to whether the proposed development will have an effect on any Natura 2000 site, individually or together with other plans and projects.</p> <p>Section 4.0 of the AA Screening Report states that:</p> <p><i>“Based on the location, nature and the zone of impact of potential effects, this screening assessment has concluded that there are no pathways between the proposed development and Natura 2000 sites. Although qualifying interest species associated with nearby SPAs are present on the amenity grassland and pitches on the seaward side of the park, the park development works will not affect these species directly or indirectly in any significant manner.”</i></p>
<p>14. Are there any inland, coastal, marine or underground waters (or features of the marine environment) on or around the location that could be affected by the Project?</p>	<p>Yes. The site is located in proximity to a coastal environment that could be affected by this development.</p>	<p>No.</p> <p>A CEMP has been prepared to ensure any necessary excavation works will follow a series of control measures to ensure the safety of work in excavations onsite and to ensure works will not cause any significant impact. These measures are set out under Section 12 of the CEMP ‘General Precautions and Controls’</p> <p>The CEMP also notes that:</p> <p><i>“The overall construction stage health &amp; safety management plan and risk assessments will be prepared in advance of the Construction works commencing.</i></p> <p><i>The developed H&amp;S plan will continue to be developed throughout the project as the project progresses and changes so</i></p>



		<i>too will the Health &amp; Safety documentation for the project.”</i>
15. Are there any features of high landscape or scenic value on or around the location that could be affected by the Project?	Yes. The development was considered in respect of potential impact on the character of a number of archaeological landmarks and Protected Structures situated throughout the site, including Balbriggan Martello Tower and Bremore Castle. However, it is considered that no impacts will arise in relation to these structures given the physical distance between them and the proposed works.	No. A Conservation Report has been prepared by Howley Hayes Architects, which provides a review and recommendations in relation to Recorded Monuments and Protected Structures.
16. Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the Project?	No. Public access and recreation will be improved once the project is complete.	No.
17. Are there any transport routes on or around the location that are susceptible to congestion or which cause environmental problems, which could be affected by the Project?	No. It is envisaged that such effects will be limited to increased visitor traffic on surrounding road network, but that transportation routes can easily accommodate the proposed development.	No. The development will be constructed in accordance with best practice and specific controls will be put in place to manage traffic arising from the construction phase
18. Is the Project in a location in which it is likely to be highly visible to many people?	Yes. The construction works will be very visible to people using nearby street and road network, and from certain surrounding residential areas, including Lambeeher residential estates and Balbriggan town centre. It is envisaged that due to their proximity to the park that these areas will directly benefit from the proposed park upgrades.	No. The visual impact of the construction phase will be temporary and therefore not significant. While the project will result in some built elements at this location, its recreational and amenity nature will not be a significant departure from its existing land use, and the design and layout of the scheme has been carefully considered in order to ensure the protection of existing and future residential amenity of adjacent areas. The site is not considered to be highly visible in the context of the wider area.
19. Are there any areas or features of historic or	No. The archaeological and conservation assessments carried	No. No significant impact will occur. A Conservation Report,



<p>cultural importance on or around the location that could be affected by the Project?</p>	<p>out confirm that no features will be affected unduly by the proposal. The Conservation Report does, however, recommend that the various historic structures should be retained and repaired with appropriate materials. Bremore Castle is already under-going a substantial reconstruction, under separate project works by Fingal County Council.</p>	<p>prepared by Howley Hayes Architects confirms this to be the case.</p>
<p>20. Is the Project located in a previously undeveloped area where there will be loss of greenfield land</p>	<p>No. The lands are currently used for a public park, and this will remain the case post development, albeit with an improved amenity value.</p>	
<p>21. Are there existing land uses within or around the location e.g. homes, gardens, other private property, industry, commerce, recreation, public open space, community facilities, agriculture, forestry, tourism, mining or quarrying that could be affected by the Project?</p>	<p>Yes. The site adjoins existing residential development and open space on its boundaries.</p>	<p>No. The subject development is carefully designed to ensure no adverse impacts on the amenities of these properties will arise.</p> <p>There will be temporary impacts to the surrounding area during the construction stage. Best practice construction management will ensure that such impacts are not significant.</p>
<p>22. Are there any plans for future land uses within or around the location that could be affected by the Project?</p>	<p>No. All existing land uses in the site vicinity are well established. We are not aware of any plans for future land uses that could be affected by the Project.</p>	<p>No. The greenfield lands to the north and northwest may be brought forward for development in the future. The proposed development will not impact the future development potential of these lands. Conversely, the improved public park amenities arising from the development proposal will benefit the surrounding location.</p>
<p>23. Are there areas within or around the location which are densely populated or built-up, that could be affected by the Project?</p>	<p>Yes. The site is located within a well-established area at the edge of an existing suburban area to the north of Balbriggan.</p>	<p>No. The subject development is carefully designed to ensure no adverse impacts on the amenities of these uses will arise.</p>
<p>24. Are there any areas within or around the location which are</p>	<p>Yes. The subject site is proximate to a number of sensitive land uses, including schools and</p>	<p>No. The subject development is carefully designed to ensure no</p>



<p>occupied by sensitive land uses e.g. hospitals, schools, places of worship, community facilities that could be affected by the Project?</p>	<p>childcare facilities by virtue of its location close to Balbriggan town centre.</p>	<p>adverse impacts on the amenities of these uses will arise.</p> <p>Noise during construction is not likely to have any significant impact given the distance between the proposed development and sensitive uses. Best practice construction measures will be employed.</p> <p>No impacts are envisaged during the operational phase of the development.</p>
<p>25. Are there any areas within or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, that could be affected by the Project?</p>	<p>No.</p>	<p>No.</p>
<p>26. Are there any areas within or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, that could be affected by the Project?</p>	<p>Yes. However, the AA Screening Report notes that several factories operate upstream from the estuary and pollution and disturbance associated with them has had an impact on the ecology of the area. There is a proposal to create a deep water facility at the north end of Mornington Dunes on the mouth of the Boyne estuary.</p>	<p>No. It is not envisaged that the Project will not result in any additional or environmental pollution.</p>
<p>27. Is the Project location susceptible to earthquakes, subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions e.g. temperature inversions, fogs, severe winds, which could cause the Project to present environmental problems?</p>	<p>Yes. There is evidence of coastal erosion in the surrounding area and we understand that the Office of Public Works are carrying out studies in this regard. Fingal County Council are aware of this erosion activity, which is taking place along the eastern part of the site, and will not be directly impacted by the proposed project.</p>	<p>No. It is not anticipated that the proposed park upgrades will significantly affect the rate of erosion on the basis that the project does not seek to intervene with the coastal environment. As noted above, the proposed works do not seek to develop any part of the coastal environment or beach.</p>