



An
Bord
Pleanála

Inspector's Report ABP-309155-21

Development	Construction of 62 no. residential units in accordance with Part 8 of the Planning and Development Regulations 2001 (as amended)
Location	Old Road, Hayestown, Rush, Co. Dublin
Planning Authority	Fingal County Council
Type of Application	EIAR screening determination
Applicants	Sean McBride and others Paul & Julie Gillen Sarah Karbowski
Date of Site Inspection	9 February 2021
Inspector	Dolores McCague

1.0 Introduction

- 1.1.1. Fingal County Council is proposing to develop a residential scheme on lands to the north-west of the town centre of Rush. Under the provisions of Article 120(3) (a) of the Planning and Development Regulations 2001 (as amended) Sarah Karbowski, Paul & Julie Gillen and Sean McBride and others have sought a direction as to whether or not Environmental Impact Assessment (EIA) is required, which would require the preparation of an Environmental Impact Assessment Report (EIAR). Fingal County Council are of the opinion that the works do not require an EIAR and have initiated the process set out in Part XI of the Planning and Development Act 2000, as amended and Part 8 of the Planning and Development Regulations, 2001, as amended.
- 1.1.2. There is a concurrent request for the Board to make a screening determination under Article 250 of the Planning and Development Regulations 2001, as amended, as to whether the development application would be likely to have significant effects on a European site requiring Appropriate Assessment (ABP-309154-21).

2.0 Site Location and Description

- 2.1.1. The site is located in the townland of Rush, to the north west of Rush town centre, bounded to the south by Old Road and to the north by Hayestown Housing Estate.
- 2.1.2. The site is relatively flat varying in elevation from 19m OD Malin to the north west to c 17m OD Malin to the north east and 17m OD Malin to the south. It is T-shaped, with the north-south section approximately 50m wide by 115-160m long, and the east-west section 230m by 50-70m. The smaller section (north-south orientation), closest to Old Road contains a detached single storey dwelling, garage and outbuildings, former garden, and adjoining field. The larger section consists of two adjoining fields. Horestown Stream flowing from west to east near the centre of the site separates the two northerly fields from the house and field to the south. A drainage ditch crosses the centre of the northern part of the site. There are drainage ditches along the site boundaries.
- 2.1.3. The site has extensive frontage to Old Road. The proposed access is approx. 280m from its junction with Whitestown Road. An additional long narrow portion of the site,

comprising an overgrown access, runs between two residential properties to the east of the main frontage.

2.1.4. There are dwellings to the east and north and along the public road to the south.

2.1.5. The site has a stated area of 2.41 hectares.

3.0 Proposed Development

3.1.1. The development will include 62 new dwellings: two storey semi-detached dwellings, two storey terraced dwellings and three storey duplex apartments (17no. 2 bed units and 45 no. 3 bed units); arranged along a north south and east west axis, with a singular vehicular access off Old Road. A 10m riparian strip is to be maintained on either side of the Horestown Stream. A pedestrian / vehicular bridge will cross Horestown Stream providing internal access within the development. Open space will be provided in the centre of the site, north of Horestown Stream.

3.1.2. Access to development is to be provided from the south via Old Road. A new vehicular and pedestrian crossing of Horestown Stream will be approximately 10m wide (6m carriageway and 2m footpaths either side). The proposed structure will comprise a 3-sided 'bottomless' box culvert with precast concrete footings.

3.1.3. The Civil Engineering Report by Downes Associates Consulting Structural & Civil Engineers includes drainage proposals, a flood risk assessment, access and traffic management and Outline Construction Management Plan (OCMP). It sets out proposals for foul and surface water disposal, the provision of a water supply to the proposed development and the provision of a culvert for the road crossing. The report includes:

Subject to confirmation from Irish Water, it is proposed that the gravity foul sewer will flow to the south of the site and connect into the existing foul sewer on Doctor's Lane.

The existing 150mm foul sewer on Doctor's Lane, to which the proposed development will discharge, is at capacity and as directed by Irish Water, the 150mm foul sewer on Doctor's Lane is to be upgraded to a 225mm foul sewer to serve the proposed development over a distance of approximately 150m,

The foul sewer within the site will cross under the existing watercourse running through the centre of the site. The watermain will also cross under the watercourse.

Surface Drainage - To the north of the stream, rainwater is conveyed by seepage through the upper soils in a south-easterly direction towards the stream. To the south of the stream, only a small proportion of the site is elevated above the stream, which allows rainwater conveyance in a north-easterly direction to the stream. Based on the topography, the remaining portion of the southern part of the site conveys rainwater towards the existing watercourse to the southwest. Due to the location of the existing watercourse through the middle of the site, the topography of the site north and south of the watercourse, and the proposed housing layout, separate SuDS measures have been adopted for the Northern site and the Southern site. Surface water proposals include the use of SuDS with discharge at greenfield rates to the watercourse for part of the land, and to the existing drainage culvert to the south west for the remainder.

The site is not affected by coastal/tidal flood events. The predictive fluvial maps do not indicate any significant overland flooding adjacent to the watercourse within the site; flooding up to the 1000 year return period is contained wholly within the stream bed profile.

Consultation will be held as required with the OPW regarding the details of the new crossing.

- 3.1.4. The Preliminary Ecological Appraisal (PEA) refers to the habitats on site and to mammals, bats, birds and amphibians either encountered, or for which the site offers potential habitat; and concludes that overall the treelines, hedgerows and watercourses provide valuable wildlife corridors and connectivity to the rural landscape to the west of the site. These habitats have the potential to provide a number of protected species (e.g. Hedgehog; Badger; Otter and Pygmy Shrew) with a means of safe commuting under cover of vegetation across the landscape, or as a point of reference for aerial commutes (bats). These habitats also offer suitable foraging ground, as well as den / burrow / sett potential for the species listed above. The drainage ditches also provide a water source for the listed species. It includes recommendations in relation to habitats - retention of willow trees and riparian vegetation along Horestown Stream, retention of buffer zone of semi-natural wet

grassland grading into drier grassland to north. This will allow supporting habitat for invertebrate prey for bats, as well as pollinating insects.

There are recommendations to ensure foraging and commuting of bats in the area continues unhindered during the construction phase and the operational phase; and recommendations in relation to birds and amphibians.

3.1.5. Planning Authority Reports

3.2. Planning Reports

3.2.1. The Planning Report includes screening for EIA and attaches associated reports (Appendix 2 EIA Screening, Preliminary screening); the screening includes:

- Size exceptional – no.
- Waste / emissions – no.
- Ecologically sensitive – no.
- Other significant environmental sensitivities – no.
- Likelihood of significant environmental effects – no. EIAR not required.
- Realistic doubt – no.
- Real likelihood of significant environmental effects – no. EIAR not required.
- Having regard to the nature, scale and location of the proposed development on lands that are zoned for residential use within the development boundary of Rush, it is unlikely that the characteristics of the proposed development are such that there would be significant adverse impacts on the environment.

3.2.2. Other Technical Reports

3.2.3. Other reports are referred to in the planning report:

3.2.4. Parks and Green Infrastructure - it is proposed to remove 23 of the 51 trees on the site. None of the trees proposed to be removed are category 'A' trees. Subject to the implementation of the landscape plan they consider the proposal acceptable.

3.2.5. Transportation Section – no objection, subject to certain amendments, some of which are included in the planner's recommendation, condition no. 8, including reduction in the entrance junction radii and the carrying out of a road safety audit.

- 3.2.6. Water Services Section – no objection.
- 3.2.7. Community Archaeologist – test excavation in advance of development.

4.0 Legislative & Policy Context

4.1. Planning and Development Act 2000 (as amended)

- 4.1.1. Section 172(1) states that an EIA shall be carried out in respect of certain applications for consent for proposed development. This includes applications for ‘sub threshold’ development, namely those which are of a Class specified in Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended, but do not exceed the relevant quantity, area or other limit specified, and the competent authority determines that the proposed development would be likely to have significant effects on the environment.
- 4.1.2. Section 172(1A) specifies that the above is relevant to development that may be carried out by the local authority under Part X.

4.2. Planning and Development Regulations 2001 (as amended):

Article 120(3)(b) states that any person at any time before the expiration of 4 weeks beginning on the date of publication of the notice, may apply to the Board for a screening determination as to whether a development proposed to be carried out by a local authority would be likely to have significant effects on the environment.

Article 120(3)(c) indicates that such applications for screening determination shall state the reasons for the forming of the view that the development would be likely to have significant effects on the environment and shall indicate the class in Schedule 5 within which the development is considered to fall.

Schedule 5 of the Regulations sets out the classes of development where EIA is required.

Part 1 – Sets out the development classes which are subject to mandatory EIA.

Part 2 – Sets out development classes subject to EIA where they exceed a certain threshold in terms of scale or where the development would give rise to significant effects on the environment.

Schedule 7 – Sets out the criteria for determining whether a development would, or would not, be likely to have significant effects on the environment, under three headings-

1. Characteristics of the proposed development.
2. Location of the proposed development.
3. Types and characteristics of potential impacts.

Schedule 7A - relates to information to be provided by the applicant or developer for the screening of sub-threshold development for the purposes of EIA. The requirement for the submission of this information in the case of requests to the Board for a determination under Article 120(3) of the Regulations, arises on foot of revisions to Article 120(3) introduced by the EU (Planning and Development) (Environmental Impact Assessment) Regulations, 2018.

4.3. Fingal Development Plan 2017-2023 is the operative plan.

4.3.1. Relevant provisions include:

The land is zoned RS-Residential: 'Provide for residential development and protect and improve residential amenity.

Objective RUSH 1

Facilitate the development of Rush as a vibrant town and retain its market gardening tradition.

Kenure Rush Local Area Plan 2009-2015 (extended to 2019) is for an area to the northwest of the proposed site.

Variation no 2 to Fingal Development Plan 2017-2023 includes Rush as a Self-Sustaining Town in the Core Area.

Objective SS20

Manage the development and growth of Lusk, Rush and Skerries in a planned manner linked to the capacity of local infrastructure to support new development.

A 5% growth level is appropriate. (Rush had a population of c. 8,500 persons per the CDP, therefore the provision of 62 houses is well within the 5% (425 persons) planned growth of the settlement).

Fingal Development Plan 2017-2023 has been subject to Strategic Environmental Assessment.

4.4. Natural Heritage Designations

- 4.4.1. The nearest Natura sites are Rogerstown Estuary SPA (site code 004015) and Rogerstown Estuary SAC (site code 000208) located c1km from the subject site.

5.0 Planning History

F17A/0391 (part of the proposed site) Lands north of Old Road, Rush, Co Dublin. Permission granted for demolition of existing 3 bedroom bungalow, adjoining garage and outbuildings, discontinue use of 2 no. existing vehicular site entrances and form 1 new site entrance off Old Road; construct new housing development consisting of 1 x 4 bed detached dormer bungalow, 3 x 3 bed detached dormer bungalows, 2 x 2 bed semi-detached dormer bungalows and 14 x 3 bed two storey semi-detached dwellings (20 total) new footpaths and access road (3 dormer bungalows to front onto and to have vehicular access directly off Old Road); site 0.748ha, 18-Dec-2017, not implemented to date

F19A/0320 Permission granted for alterations to already approved development Reg. Ref. F17A/0739, comprising: (a) Minor alterations to house types and 5 no. additional houses as follows: (i) 2 no. 4 bedroom 2 storey semi-detached houses in lieu of 4 no. 4 bedroom 2 storey semi-detached houses; (ii) 38 no. 3 bedroom 2 storey semi-detached houses in lieu of 31 no. semi-detached, end & mid terrace houses (from 35 to 40 dwelling units in total); (b) New gravity foul main to connect into existing manhole to the east of the site and adjacent to Seabrook at Brook Lane and omission of pumping station, (c) Associated alterations to internal road layout and relocation and reduction in public open space; (d) All associated site works; all on this 1.292ha site on the south side of Brook Lane Haystown Rush Co Dublin (opposite Daffodil Stores glass houses), in a different part of Rush, and referred to in the documentation provided.

The current application is registered under Ref: PART XI/005/20

6.0 EIA Screening

6.1. Request for Direction and Submitted Documents

6.1.1. Requests were submitted by Sean McBride and a list of other named observers, by Paul & Julie Gillen, and by Sarah Karbowski, seeking a determination by the Board as to whether Environmental Impact Assessment would be required for the proposed development. The following summarises the content of these submissions.

- EIAR Screening Report reasons do not appear to substantially justify the omission of an EIA.
- 4.4.1 (*references are to numbering in the JBA Consulting EIAR Screening Report*) surface water – the stream has flooded in previous years.
- 4.8 landscape and visual – the development is not low in landscape and visual impact.
- 4.9.1 traffic – the proposed new road has seen little to no progress. The planned development would likely be operational before any relief is provided to the Old Road. There is genuine concern with the increase in traffic along a narrow road with room for only one vehicle in places, frequented by large agriculture machinery during the busy farming season. The road has no footpaths. The introduction of 62 houses with small children, in addition to the existing resident's children, will increase accident risk. Traffic calming measures should be determined before any further () is put on this road.
- Table 5.1 characteristics of the proposed development – screening questions:
 - The scale and design could be considered significant.
 - The density is significant – far higher than any developments surrounding. More town centre than outer boundary of Rush.
 - There are other developments under construction, due consideration to the overall picture has not been given: significant shortages of school places, doctor availability, and public transport capacity will be exacerbated.

- A significant amount of nuisance will be created.
- Ecology – 3.3 (*this refers to the numbering in the JBA Screening for Appropriate Assessment, Technical Report*) – there have been sightings of hedgehogs by neighbouring properties, and sightings of native birds; photos provided.
- Consistency of drawings – the layout has changed between EIAR screening report and uploaded drawings as highlighted in the submission.
- They believe, contrary to the Council's opinion, that the proposed development will have a detrimental impact on the immediate locality and the wider community and environment.
- The field has been untouched for a number of years and has become home to numerous species of mammals and birds.
- There is a natural border of hawthorn, blackberry and other plants and trees. This will be removed and replaced by a fence. It will cut off access to the regular visitors: foxes, rabbits, hares and hedgehogs.
- The site has a ditch which regularly fills with water.
- Re. no sign of frogs and toads – there would have been 8 in Ms Karbowski's pond at that time.
- Referrer lists birds seen in her garden and questions why the survey missed all signs of life.

6.2. Planning Authority Response

6.2.1. The Planning Authority has responded to the referrals stating that the internal consultation planning report contains the screening undertaken for the purpose of EIA. This was informed by the EIAR screening report undertaken by JBA Consulting. Re the Schedule 7A information the following documentation is appended:

- FCC Planning Departmental internal consultation planning report (6th November 2020),
- Brady Shipman Martin Review of AA Screening report (3rd November 2020),
- JBA Screening for Appropriate Assessment Technical Report (August 2020),

- Civil Engineering Report (July 2020) containing Stage 2 Site Specific Flood Risk Assessment, and
- Preliminary Ecological Report, which details that no invasive species are present on the site.

They consider that the these submissions and the information available on the consult.fingal portal at the link provided provide the information required.

7.0 Assessment

7.1. Requirement for EIA

- 7.1.1. I have read the documents submitted by the planning authority and those provided for consultation on the consult.fingal portal. The proposed development is a type of residential infrastructure development listed under Part 11 of Schedule 5 of the Planning and Development Regulations, 2001 (as amended).

7.2. EIA Screening Criteria

- 7.2.1. In accordance with Article 109 (4) (a) the Board, in making its screening determination as to whether or not there is a real likelihood of significant effects on the environment arising from a proposed development, shall have regard to -

The criteria set out in Schedule 7,

The information submitted pursuant to Schedule 7A,

Any further information submitted,

The results from other assessments (e.g. SEA), and

The location of the project in a sensitive site (e.g. SAC/SPA/NHA),

- 7.2.2. Re. assessment of the development under the criteria set out in Schedule 7 of the Regulations. Schedule 7 lists the criteria for determining whether a development would or would not be likely to have significant on the environment under the following headings:

- Characteristics of proposed development,
- Location of proposed development,

- Types and characteristics of potential impacts.

7.3. Characteristics of proposed development

Size and scale of proposed development -

- 7.3.1. The proposal is for a scheme of 62 no. dwellings on a site of 2.41 hectares. It comprises an infill development in an urban location on zoned lands, which will be connected to existing infrastructure. The site is surrounded by low density residential developments. It is considered that the site has the capacity to accommodate the development and that the proposal would not be significantly at variance with the established pattern of development in this suburban area.
- 7.3.2. Having regard to the nature and size/scale of the proposed development, which is significantly below the thresholds set out in Part 2 of the Fifth Schedule of the Regulations, I do not consider that a requirement for EIA arises.

Potential for cumulative impacts with other existing and/or approved projects -

- 7.3.3. The development site is bounded by established residential development to the north, east and south. A small area of land zoned for residential development adjoins part of the western boundary and part of western boundary adjoins land zoned as rural. There is limited potential for cumulative impacts with development on adjoining residential lands.
- 7.3.4. It is proposed to provide a clear span crossing over Horestown Stream and to maintain a 10m riparian strip on either side of the stream, and no in stream works are proposed. This is important in the context of considering cumulative impacts on water quality.
- 7.3.5. Having regard to the existing site context and available infrastructure, it is considered unlikely that any impacts which could arise in cumulation with other development in this area would be of a magnitude that would generate the need for EIA.

Nature of any demolition works, use of natural resources, production of waste, pollution and nuisances -

- 7.3.6. The existing buildings on the site require demolition and have been subject to survey, in particular with regard to the presence of asbestos and the methodology to be employed in relation to its removal and disposal, which is subject to licence. The

nature and scale of the development, which comprises a medium scale residential scheme, would not result in a significant use of natural resources. The development will be connected to existing public infrastructure. Stormwater will be managed on site to mimic greenfield run-off rates. Rush Wastewater Collection Scheme (IW) was completed in 2018 and all wastewater generated in the town is transported to the Waste Water Treatment Plant (WWTP) at Portrane (Irish Water, 2020). Irish Water states that the network has been designed to accommodate the planned growth of the settlement.

7.3.7. The potential for pollution and nuisance arising from an urban development of this scale would be limited. The construction phase will result in noise, dust, and traffic related impacts with the potential to cause nuisance and impact on the amenities of adjoining dwellings. However, these impacts will be temporary and short lived and will be controlled as part of the standard construction management plan.

7.3.8. I consider that an urban infill project of the scale proposed has such limited potential for significant effects arising from the use of natural resources, the production of waste or the generation of pollution and nuisance, as not to warrant EIA.

Risk of major accidents and/or disasters including those caused by climate change -

7.3.9. Having regard to the location, nature, scale and characteristics of the proposed development, comprising a medium sized residential scheme and associated infrastructure, it is considered that there is negligible risk of a major accident and/or disaster.

Risk to human health -

7.3.10. There are no significant risks to human health associated with the proposed development. The risk to human health arising from water contamination, air pollution, noise etc is considered to be negligible and not of a magnitude to generate a requirement for EIA.

7.4. Location of proposed development

Existing and approved land use -

7.4.1. The site is currently vacant but is zoned for residential use. It is enclosed by hedges, including trees and with a stream flowing through the site. The proposal includes the

maintenance of a riparian area along the stream and the provision of open space to the north of the stream. The proposed residential development would complement the pattern of development in the area and would not result in any significant adverse impacts on land use.

Relative abundance, availability, quality and regenerative capacity of natural resources -

7.4.2. In its existing state, given that it is an undeveloped area within the built environment, it is a resource with potential for flora and fauna. Surveys conducted on the site reveal that the habitats have ecological value and are of potential value for protected mammals, including some (bat species) recorded within the site. There will be a loss of vegetation associated with the proposed development. The proposal includes the maintenance of a riparian area along the stream and the provision of open space to the north of the stream, together with design by mitigation for both construction phase and operation phase (e.g. limiting height of lamp standards and light levels and type).

7.4.3. The natural resources used in the proposed development would be limited and minimal ongoing use of natural resources would be involved in the proposed use of the site for residential purposes. There is no potential for significant effects.

The absorption capacity of the existing environment -

7.4.4. The site is located within the built-up area of Rush and connected to the sea via Horestown Stream. The retention of habitat with potential value for protected species is part of the design. The site has been screened for appropriate assessment and this matter is considered in more detail under the AA Screening determination (ABP 309154-21). There are no designated landscapes or sites of historical, cultural or archaeological significance in the vicinity of the site.

7.4.5. The immediate environment associated with the site is not considered as sensitive and has the capacity to absorb the proposed development without generating significant effects on the environment or the requirement for EIA.

7.5. Types and Characteristics of the Potential Impact

Nature, magnitude and extent of the impact -

- 7.5.1. The extent of the impact in terms of geographical area and the size of the population likely to be impacted is limited to the immediate area of Rush where the development will be located. The construction stage will result in impacts on the local population arising from dust, noise and traffic. These will be of short duration and capable of effective mitigation by normal good construction and best practice methodologies.
- 7.5.2. The development of the site will have generally neutral to positive visual impacts for the area associated with the removal of an existing vacant and under-utilised site. The proposed development will not impact on any protected views identified in the development plan.
- 7.5.3. In terms of biodiversity, the proposed development will result in the loss of habitats that exist on site. The habitats were recorded during the site visit and classified according to Fossitt (2000). The site was categorised into habitat types:
- a) dry calcareous and neutral grassland
 - b) wet grassland
 - c) depositing lowland river
 - d) drainage ditches
 - e) scrub
 - f) treelines
 - g) hedgerows/treelines
 - h) immature woodland
 - i) buildings and artificial structures

Protected Flora and Fauna

- 7.5.4. The treeline and hedgerow habitats offer suitable nesting opportunities for nesting birds. These were not surveyed during the site visit. There was no evidence of nesting ground birds in the grassland areas.
- 7.5.5. Mammals - Field signs of mammal activity were recorded as mammal trails through the grass, most likely fox. No signs of protected mammal species were recorded on the site visit. Small burrow holes were found in the grassland of the western field.
- 7.5.6. There were no records of third schedule invasive species.

- 7.5.7. The existing habitats would produce refuge and foraging habitat for the species of birds and mammals that may use the site and removal would result in their displacement. The retention of a significant riparian zone adjacent to the stream will maintain an ecological corridor and refuge for species currently using the site.
- 7.5.8. The proposed development will result in limited impacts on land and soil; negligible having regard to the limited size of the site. No instream works are proposed and subject to best practice construction methodologies and environmental controls, there is no significant risk to ground or surface water quality.
- 7.5.9. There is potential for impacts on air and climate and noise and vibration to occur during the construction phase. Having regard to the temporary nature of the works, these impacts would be short term and capable of effective mitigation through good construction practice.
- 7.5.10. There are no known archaeological monuments proximate to the site. No potential significant impacts on cultural heritage have been identified.
- 7.5.11. It is not considered that the proposed development would have a significant impact on material assets in the locality.
- 7.5.12. There is potential for interactions between various environmental factors, notably between land and biodiversity, population and materials assets. Subject to the identified mitigation measures, significant interactions are not considered likely or of such magnitude that they would give rise to significant additional environmental impacts.

Probability, intensity and complexity of impacts -

- 7.5.13. The proposal will result in the loss of a small area of habitat. Having regard to the limited scale of the proposal, the nature of the environmental impacts are not complex or intense.

Expected onset, duration, frequency and reversibility of the impact -

- 7.5.14. It is expected that the impacts will be on-going, long term and would only be reversible if the housing scheme were removed and the site reinstated to its pre-development state.

Transboundary nature of impact -

7.5.15. There will be no transboundary impacts associated with the proposed development.

Cumulative -

7.5.16. The site is zoned for residential purposes in the development plan. The adopted plan has been subject to Strategic Environmental Assessment which concludes that the adopted development scenario is the optimal solution having regard to environmental and planning effects. The Ecological Impact Assessment submitted states that no in-combination effects are expected. I have had regard to the status of the surrounding lands, which is largely zoned for residential purposes and note that no substantial developments have been referred to within the information submitted which would give rise to concerns in relation to cumulative effects.

8.0 Recommendation

8.1.1. Having regard to the above assessment, I consider that the proposed development of 62 no. residential units and all associated site development works would not be likely to have significant effects on the environment. I therefore recommend that Fingal County Council be advised that the preparation and submission of an environmental impact assessment report is not required in respect of the proposed development.

9.0 Reasons and Considerations

9.1.1. Having regard to the following:

(a) The criteria set out in Schedule 7 and 7A of the Planning and Development Regulations 2001, as amended,

(b) The location of the site on lands that are zoned for residential use under the provisions of the Fingal County Development Plan 2017-2023 and the results of the strategic environmental assessment of this Plan undertaken in accordance with the SEA Directive (2001/42/EC),

(c) The nature, scale and location of the proposed development on a part brownfield site in a suburban area, served by public infrastructure,

(d) The pattern of development in the vicinity,

(e) the design and construction methodology response to the natural heritage in the surrounding area,

(f) The location of the site outside of any sensitive location specified in article 109(4)(a) of the Planning and Development Regulations 2001,

(d) the guidance set out in the “Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding Sub-threshold Development”, issued by the Department of the Environment, Heritage and Local Government (2003),

(g) The submission of the planning authority, and

(h) The report and recommendation of the Inspector,

it is considered that the proposed development would not be likely to have significant effects on the environment and accordingly, that the preparation and submission of an environmental impact assessment report is not therefore required.

Planning Inspector

8 February 2021

Appendices

Appendix 1: photographs

Appendix 2: Fingal Development Plan 2017-2023, as varied, extract.