Addendum to Inspector's Report ABP-319317A-24

Development	Construction of 92 residential units comprising 71 apartments and 21 houses, childcare facility and all associated site works. A Natura Impact Statement (NIS) was submitted with the application.
Location	Site located between R730 and Old Hospital Road, at Park & Stoneybatter, Wexford
Planning Authority	Wexford County Council
Planning Authority Reg. Ref.	20231563
Applicant(s)	Bawn Developments
Type of Application	Permission
Planning Authority Decision	Refuse permission
Type of Appeal	First party
Appellant(s)	Bawn Developments
Observer(s)	PJ Lawless
Date of Site Inspection	15th October 2024
Inspector	Béhinn O'Shea

1.0 Introduction

1.1. This report is prepared on foot of a Board Direction.

1.2. The Inspector's report dated 27th November 2024 recommended refusal of permission for the proposed development for the following reasons:

1. *The proposed development is in an area which is at risk of flooding. Having regard to the deficiencies in the Surface Water and SuDS Strategy which form part of the application, in particular the failure to consider the changes to the hydrological regime of the site which will result from the proposed development, and failure to consider overland run-off other than from surfaced road areas, it is considered that the applicant has not demonstrated that the proposed development would adequately manage surface water from the site and would not give rise to pluvial flooding, within and outside the proposed development. The proposed development would therefore be contrary to Objectives FRM14, SWM01 and WQ15 of the Wexford County Development Plan 2022-2028, would seriously injure the amenities of property both within the proposed development and in the vicinity, and would be prejudicial to public health.*

2. *Having regard to the deficiencies in the Surface Water and SuDS strategy which form part of the application, it is considered that the applicant has failed to demonstrate that the proposed development will not have a significant negative impact on the quality of water within the Carricklawn stream, which is a hydrological link with Slaney River Valley SAC and the Wexford Harbour and Slobs SPA. As it has not been determined that the proposed development would not have a significant adverse effect on these European Sites, the proposed development would materially contravene objectives NH04 and NH08 of the Wexford County Development Plan 2022-2028 and be contrary to the proper planning and sustainable development of the area.*

1.3. The Board deferred consideration of the case and issued a Section 132 Notice to the applicant as follows:

Having regard to the need to ensure that that the surface water management strategy sufficiently describes the surface water impact in terms of volume, conveyance and treatment in the site and in relation adjacent properties.

1. *consider existing and modified flows, and surface water run off/movement from areas other than hard surfacing, including that entering from outside the site,*
2. *discuss any likely changes to the hydrological regime given cut and fill, contouring, retaining walls, structures and removal of hedgerows/treelines, and*
3. *the sufficiency of the attenuation tank capacity in light of (i) and (ii) above and its discharge to the Carricklawn Stream located within a flood zone*.

1.4. The response to the notice was circulated to the Planning Authority and 3rd parties and an Addendum report requested from the Inspectorate.

2.0 Response to Section 132/Section 131 Notices

2.1. Applicant Response:

The response of the applicant/appellant to each of the three items of the Section 132 Notice is set out below.

2.1.1. **Item 1** "**consider existing and modified flows, and surface water run off/movement from areas other than hard surfacing, including that entering from outside the site"**

The response states that

- The existing site layout has been assessed and existing surface water flows identified and indicated on drawing W23048/P851

- Surface water run-off generated within the site will infiltrate to soil and will flow in a northerly direction towards the Carricklawn Stream.

- 5 soakway tests were carried out as part of the planning application, excavated to 1.6m deep. The water table was recorded in pits TH04 and TH05 at 4.15m OD and 1.5m OD respectively.

- Surface water from surrounding roads infrastructure (the Inner Relief Road, Old Hospital Road, Stony Park Road and R730 Carcur Road) will not enter the site as flow on these roads is directed to gullies. Gullies have been indicated on drawings. Some gullies have been observed to have been blocked; these require to be maintained to ensure proper flow of surface water and prevent it accessing the site.

- There is an intermittent stream on the Old Hospital Road; this discharges to a gully. There is an ephemeral stream between the site and Manlo House to east. A surface water sewer is proposed to cater for this flow.

- The flow of water within the site will remain to the Carricklawn Stream, conveyed by filter drains and land drains around the proposed units and to the rear of retaining walls, discharging to the surface water sewer, which discharges to the Carricklawn Stream

- The area most at risk of surface water ingress from outside the site is along the southern boundary of the development. A kerb has not been constructed on the east bound carriageway of the Old Hospital Road, therefore the raised grass verge and bank directs water towards gullies and prevents it entering the site. The proposed layout includes a French drain in the rear gardens of units located on the Old Hospital Road, to cater for water that infiltrates through the grass verge and sod/stone bank.

2.1.2. **Item 2: Discuss any likely changes to the hydrological regime given cut and fill, contouring, retaining walls, structures and removal of hedgerows/treelines**

The response states that:

- There will be a reduction in direct surface water infiltration to the ground due to road/footpath surfaces, roof finishes and impermeable areas.
- The units in the south-east of the site, accessed from Local Streets 1 and 2, require subterranean structures i.e. basements and retaining walls. The water table was not encountered during soakway tests and the infiltration rate was between 10^{-5} and 10^{-6} m/s in these areas, therefore it is suitable for infiltration. French drains will convey water in excess of acceptance rate, to the surface water drainage network.
- Units accessed from the north of local street and west of Local Street 1 will have a lesser impact on the hydrological regime due to reduced cut volumes. FFL are expected to be 2m above the water level.
- The removal of banks, hedgerows and treelines will not significantly alter the hydrological regime as surface water will continue to discharge to the stream post development. Hedgerows are generally aligned north south parallel to flow. Where hedgerows are removed, compensatory planting has been proposed.
- The natural conveyance of water from the stream beside Manlo House will be altered to surface water drain/sewer to the Carricklawn Stream

2.1.3. **Item 3 The sufficiency of the attenuation tank capacity in light of (i) and (ii) above and its discharge to the Carricklawn Stream located within a flood zone.**

The response states that:

- SuDS and Nature Based SuDS measures have been included in the proposal. The SuDS measures have been accounted for in the calculation of the proposed attenuation tank. Maximum design storage required is 204.1m^3. There is an additional capacity of 115.9 m^3, or 55%, which allows for the subsurface water that will enter the surface water network via French drains, subsurface drains to the rear of retaining walls and basement, and the ephemeral stream.

- The attenuation tank is located outside the 1:1000 year flood zone. The geotextile liner surrounding the attenuation tank will be an impermeable geotextile liner, to prevent changes to the hydrological regime in the locality of the tank. The system can be designed as a ballast system to prevent buoyancy.
- The discharge pipe is located within the flood zone. A tide flex valve will permit discharge but prevent backflow from the stream. This ensures water can discharge during a flood event.

2.2. Observer Response:

In response to the Section 131 Notice the Observer states:

- The applicant's response refers to five soil infiltration tests completed on the site; however only four were conducted as water could not be supplied at the location of the fifth. Therefore there is a lacuna in the information
- Surface water from Block A is not considered in relation to surface water run-off
- There is no way to ensure drains/gullies on adjoining public roads will be maintained; a maintenance schedule of the clearing of drains should be submitted.
- No consideration has been given to the tidal influence on the Carricklawn Stream and the ability to absorb discharge from the site at times of high tide.
- French drains have limited lifespan and become blocked and ineffective. French drains require maintenance and there is no guarantee they will be maintained as they run through private lands where they could be blocked or built over. They are not suitable or reliable as a method to prevent flooding
- There is no reference in relation to surface water flow and knock on effect on Stoney Park if the entranceway is opened.
- Water will still discharge to the Carricklawn Stream, but with less absorbed on land there will be greater run-off which could cause flooding. The adjoining area is prone to flooding; additional gullies and pipes have been installed to deal with flooding.
- Paving of gardens to accommodate vehicles is likely and has not been considered.

- No details of maintenance of attenuation tank.
- Discharge pipe in flood zone liable to damage/dislocation.
- The location of the stream differs on maps.
- Supporting information is provided, on issues with French drains, the value of willow (in terms of ecology, to clean wastewater, buffer rivers, manage flooding and rehabilitate contaminated land) and photographs (of site boundary, recent piped intervention to prevent flooding, slope of site and location of proposed entry way to Stony Park).

2.3. Planning Authority Response

- No response received.

3.0 Assessment

3.1. To re-iterate:

- The site of the proposed development is greenfield and largely overgrown. There are mature hedgerows/treelines to the south-western, northern and eastern boundaries. Further hedgerows/treelines run north/south at two locations within the site. The site rises from north to south with a difference in levels of approximately 15 m. The area is prone to flooding and the northern portion of site is within flood zone A. The Carricklawn Stream, which is tidally influenced, flows in northeasterly direction within the north-western portion of the site and along the site boundary, and is then culverted to the north of the R730. This provides a hydrological connection to European sites to the east. The site appears wet in nature, with reeds/rushes present in the middle and northern portions.
- The proposed development, as per the initial application, provided a surface water sewer network collecting run off from the internal roadway via gullies. These discharge to tree-pits, and surplus water (above the infiltration capacity of tree-pits) is returned to the surface water network, which discharges to the attenuation tank for treatment/flow control, and onwards to the Carricklawn Stream. Calculations and drawings were

provided with the initial application to support the proposed surface water drainage infrastructure serving the road. Calculations and drawings did not clearly reflect the capture of roof run-off or run-off from other new impermeable surfaces. Calculations did not reflect infiltration losses at tree pits/permeable paving etc.

- The application proposes substantial ground interventions within the site, particularly in the area of proposed houses and duplexes, with 9 retaining walls (generally) northsouth between properties and one retaining wall (generally) eastwest, positioned to south of duplexes. These create barriers to flow of surface water. Drawings/details on the initial application did not show proposed modified ground levels throughout the site, or demonstrate that resulting modified overland flow had been considered.
- The above resulted in a risk of pluvial flooding within the site, particularly near subsurface structures. In the absence of the analysis of modified flow, it was not certain where such water will move, therefore there also was a risk of flooding outside the site. If/when surface water reaches the network, there were uncertainties over the volume of water reaching the network and whether the network and tank could cater for this volume, particularly during flood events.

3.2. The S132 Notice was an opportunity for the application to address these concerns.

3.3. The response of the applicant to the S132 Notice sets out the existing flow of surface water run off within the site including that entering from outside the site.

3.4. The site is surrounded on three sides by roads infrastructure. The response identifies the location of gullies on the roads which will cater for surface water on same. The response also accounts for observations during site inspection in relation to trickling water, due to blocked gullies. I accept that the maintenance of drains is the responsibility of the local authority and that these arrangements are adequate for surface water flow on surrounding roads.

3.5. The response notes the absence of a kerb on the Old Hospital Road eastbound and that the existing bank/ditch directs water towards gullies. A French drain is proposed to the rear of properties, to cater for surface water which does not enter

the road gullies but infiltrates through the bank. I consider this acceptable in principle, as secondary protection against surface water run-off from the road, which should normally be catered for by gullies/piped infrastructure.

3.6. The response also acknowledges the existence of an ephemeral stream at the boundary with Manlo House where water enters the site. This is located in an existing hedgerow/ditch, which continues in a line north eastward, and is proposed to be removed and replaced as part of the development, alongside a proposed retaining wall. It states that a surface water pipe is proposed to cater for this flow, and connect it to the surface water system. (I note a filter drain is indicated on drawing W23048-P856 at this location.) I consider this acceptable in terms of water management, as such a feature would run through a public area, rather than private property. However, I note it is not a nature-based solution, and involves the removal of hedgerow, modification of a natural watercourse and ultimate piping into the surface water network. I also do not accept that this hedgerow is parallel to existing surface water flow; it is offset and would have a value in slowing and treating run off moving northwest through the site.

3.7. The modified direction of flow is indicated. The drawing reflects the presence of subterranean structures, e.g. basements, retaining walls and the barriers that these present to flow. I note the proposed modified direction of flow indicated in rear gardens, that will be in opposing directions from a shared side boundary wall, towards the line of proposed filter drains alongside retaining walls. This will require changes in ground levels/contouring throughout the portion of the site containing apartments and duplexes.

It is noted that there is still no drawing showing proposed site levels/contours, or east west sections through the site, to demonstrate future ground levels and provide confidence in the modified direction of flow indicated, and the management of this flow. While noting Street Elevation A, there is no clear indication of revised levels in comparison to Stoney Park and Bayview Lodge to east, including at the area of the proposed road opening.

The lack of detail in relation to levels and relationship with adjoining development is broader than a drainage issue. Development and excavations are proposed within 2m of the boundary with Stony Park, with potential negative effects on

boundaries and drainage. Given the absence of certainty in the difference in levels at the eastern boundary, the omission of units 81 and 92 would be recommended, in the event of a decision to grant permission, to allow for appropriate contouring and drainage of land between the adjacent properties, and provision of appropriate boundary treatment.

3.8. I note the addition of a significant amount of French drains and filter drains around structures and retaining walls, in response to the S132 Notice. This is a significant new intervention across the development in terms of pipework and I consider it recognition of the drainage issues within the site.

In the case of House Type A, split level dwellings, these drains run alongside the rear of buildings at maximum excavation depth (i.e. c.3 m below ground level as per Section drawing 2 and 3 submitted in response to the S132 Notice) and also between structures under stairs. They also run under some of the duplex units.

I note that the maximum depth of excavation is greater than the depth of trial holes excavated (1.6m). The position of filter drains relevant to the water table and their effectiveness, as well as the impact of proposed excavations and structures on the potential for infiltration, is therefore not known.

I also have concerns about the sustainability of filter drains, and their on-going effectiveness, and challenges to maintenance. If they fail, pluvial flooding in these properties is likely. In the event of grant of planning permission, it would be recommended to de-exempt development within the curtilage of the house, such as extensions, sheds etc. to safeguard these features.

3.9. The response states that the removal of sod and stone banks, hedgerows and treelines will not significantly alter the existing hydrological regime as surface water will continue to discharge to the Carricklawn Stream. However, the response does not refer to the removal of the hedgerows and trees along the ditch/stream at the northern site boundary, which it appears would be required to provide the 2m wide footpath proposed at this location along the R730 (as described in Section 7.7.2.8 of the initial Inspector's Report). This would be a hydromorphological change to the stream/ditch.

In the event of a grant of planning permission, it would be recommended to omit the proposed footpath at this location. It is noted that there is a footpath on the

northern side of the R730, and there are alternative (indirect) proposed footpath links through the development site on the south side. This does not preclude a future application for a revised footpath along the southern side of the R730, subject to an appropriate level of detail and relevant assessments.

3.10. I consider that existing and modified flows, and surface water run off/movement from areas other than hard surfacing, including that entering from outside the site, have been largely demonstrated in terms of direction. However, there is no additional information in relation to modified flow in terms of volume.

3.11. The applicant's overall position that, despite changes to the hydrological regime, the site will still drain to the Carricklawn Stream, is noted. Most of the proposed constructed development drains ultimately via network to the attenuation tank, (including that surface water intended to infiltrate but being in excess of acceptance rate). The remainder (primarily the open space portion to the northern part of the site) would naturally drain to the stream. Subject to (i) the retention of ditches/hedgerows at the northern boundary, (ii) appropriate levels/contours between the development site and Stoney Park to east, and (iii) adequate capacity of the network and tank and controlled discharge of the attenuation tank (discussed below), I consider that it is reasonable to conclude that the proposed development will not give rise to flooding outside of the site.

3.12. However, in terms of the capacity of the tank, the brownfield run-off rate has not been calculated, i.e. the modified run-off rate, (taking into account increased run-off from all impervious areas, interception losses, infiltration losses). This was the case in the initial application and remains so in response to the S132 Notice. Therefore, it cannot be demonstrated whether this modified rate will meet or exceed the greenfield rate and by how much, and how much spare capacity is within the tank for flood events. The application and Section 132 response states that the max requirement is 204.1m^3, however the basis for its calculation seems to remain unclear.

3.13. It is noted that the network of filter drains now proposed, and the piping of the ephemeral stream, will discharge additional volumes into the site's surface water network compared to that that of the initial application. However, no updated calculations were submitted as part of the response to the S132 Notice to

demonstrate that the impact on capacity of both network and tank has been considered, and provided for.

3.14. The response states that the SuDS measures have been accounted for in the calculation of the proposed attenuation tank. I can find no detail of technical consideration of this in terms of volume, either in the Section 132 response or in the initial Engineering Report other than a brief comment in Section 3.2 (page 6) of that report (dated December 2023). While it is also noted that Section 3.1 (page 6) of that report indicates that roof run-off will discharge to the sewer network, there are no calculations or drawings supporting this. As above, there is no calculation of brownfield run-off rates to demonstrate that run-off including all impervious area, not just the road, have been considered.

3.15. The response state that a Tideflex valve will permit discharge but prevent backflow from the stream; this ensures water can discharge during a flood event. I consider it is likely that whether the water discharges during a flood event will depend on the pressure differential on either side of the valve. Therefore the capacity of the attenuation tank is additionally important, should storm water discharge not be possible, to avoid flooding.

3.16. With regard to the observer's comments in relation to mapping differences of the stream, this matter was not previously raised. However, from site inspection and review of mapping, I conclude the main waterbody associated with the Carricklawn Stream flows through the western part of the site. There is a drainage ditch with water along much of the northern site boundary with two culverts under the road, serving both these features, and linking to a network of features and wetland north of the R730. The more western culvert may no longer be active. While there may be some differences in terms of mapping of the line of the main watercourse, all watercourses are reflected, and all ditches/watercourses discharge/link to the Carricklawn Stream. Therefore I do not consider that this discrepancy has a bearing on the consideration of the proposal.

3.17. Regarding infiltration testing, while no test was carried out at the fifth trial hole, I note that the proposal is not relying on infiltration at this portion of the site. Therefore I do not consider there to be a gap in information relevant to the proposed development.

4.0 Conclusion:

4.1. I refer the Board to the previous Inspector's Report, in particular Section 7.7.2.21 and Section 9 and to the following objectives of the Wexford County Development Plan.

Objective FRM14 of the CDP requires the use of sustainable drainage and nature-based techniques in order to reduce the potential impact of existing and predicted flooding risks, to improve water quality, enhance biodiversity and green infrastructure and contribute to climate mitigation and adaptation.

Objective SWM01 requires all proposals should include a commensurate drainage assessment used to design the surface water management system for the site, and this assessment should outline the drainage design considerations/strategy in line with the flood risk, surface water management and climate change requirements and objectives of the County Development Plan and the County Strategic Flood Risk Assessment.

Objective WQ15 is ensure that development permitted would not negatively impact on water quality and quantity, including surface water, ground water, designated source protection areas, river corridors and associated wetlands, estuarine waters, coastal and transitional waters.

Objective NH04 is to protect the integrity of sites designated for their habitat and species importance and prohibit development which would damage or threaten the integrity of these sites. Such sites include Special Areas of Conservation (SACs) and candidate SACs, Special Protection Areas (SPAs), Natural Heritage Areas (NHAs) and proposed NHAs, Nature Reserves, Refuges for Fauna and RAMSAR sites. To protect protected species wherever they occur.

Objective NH08 is to ensure that any plan/project and any associated works, individually or in combination with other plans or projects, are subject to Screening for Appropriate Assessment to ensure there are no likely significant effects on any Natura 2000 site(s) and that the requirements of Article 6(3) and 6(4) of the EU Habitats Directive are fully satisfied. Where a plan/project is likely to have a significant effect on a Natura 2000 site or there is uncertainty with regard to effects, it shall be subject to Appropriate Assessment. The plan/project will

proceed only after it has been ascertained that it will not adversely affect the integrity of the site or where, in the absence of alternative solutions, the plan/project is deemed by the competent authority imperative for reasons of overriding public interest.

4.2. It remains my opinion that the surface water and SuDS strategy is deficient:

- The lower levels of the site are wet in nature and there is a history of flooding in the area.
- Source interception remains minimal.
- While modified flow direction is now indicated, modified volumes are not.
- While surface water run off/movement entering from outside the site has now been considered, conveyance within the site (other than the roadway) appears overly reliant on filter drains. These are significant interventions of pipework, with an unknown position in relation to the water table, and many of which are located under permanent structures, limiting maintenance.
- There are no drawings indicating proposed levels/contours within the site, proposed sections east west through the site, or through the eastern site boundary showing the relationship with existing adjoining development.
- Design details for the surface water network do not demonstrate capacity. Calculations reflect the surface water network serving the road but there are no calculations of additional run-off e.g. from roofs, footpaths and other impermeable areas, or calculations of losses to infiltration. There are no revised calculations for the surface water network to account for the discharge to the network from the extensive network of filter drains now proposed.
- As the modified/brownfield rate has not been calculated, it cannot be determined that the brownfield rate is less than or equals the greenfield rate. I.e. it has not been demonstrated that the development will not increase run-off.
- It cannot be clearly concluded that the attenuation tank is adequate for run-off generated.

- Attenuation discharge is to a stream, within a flood zone, with a high probability of flooding, which may limit discharge during flood events. Therefore, adequate capacity in the tank is increasingly important.

4.3. The response does not ensure that that the surface water management strategy "sufficiently describes the surface water impact in terms of volume, conveyance and treatment in the site and in relation adjacent properties", as per the S132 Notice.

4.4. I consider that this creates potential for pluvial flooding, within and outside the site, in an area with a history of flooding. I consider that the deficiencies in the surface water analysis may lead to undermanagement of surface water in terms of volume, conveyance and treatment, undermining surface water quality discharging to the Carricklawn stream. This stream ultimately discharges to the Slaney estuary, therefore potential impacts on European Sites arise.

5.0 Appropriate Assessment

5.1. I have reviewed the Appropriate Assessment undertaken as part of my initial assessment, and contained within the Inspector's Report dated 27th November 2024, having regard to the response of the applicant to the S132 Notice. My conclusions remain unaltered.

5.2. On the basis of the information provided with the application and appeal, including the Natura Impact Statement, and having regard to the response to the S132 Notice, I am not satisfied that the proposed development individually, or in combination with other plans or projects, would not adversely affect the integrity of European site(s) Nos. 000781 Slaney River Valley SAC and 004076 Wexford Harbour and Slobs SPA, in view of the sites' Conservation Objectives.

5.3. This conclusion is based on the following:

The deficiencies in the surface water and SuDS strategy within the proposed development, and consequent risk to surface water quality discharging to the Carricklawn stream which is a hydrological connection to these proximate European Sites.

6.0 Water Framework Directive

6.1. See Appendix 2. I have assessed the proposed development and have considered the objectives as set out in Article 4 of the Water Framework Directive which seek to protect and, where necessary, restore surface & ground water waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration.

Having considered the nature, scale and location of the project, and in particular the surface water strategy, I am not satisfied that that the proposed development will not result in a risk of deterioration on any water body (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives.

7.0 Recommendation

I recommend permission be refused as set out below.

8.0 Reasons and Considerations

1. The proposed development is in an area which is at risk of flooding. Having regard to the deficiencies in the Surface Water and SuDS Strategy which form part of the application, it is considered that the applicant has not demonstrated that the proposed development would adequately manage surface water from the site and would not give rise to pluvial flooding, within and outside the proposed development. The proposed development would therefore be contrary to Objectives FRM14, SWM01 and WQ15 of the Wexford County Development Plan 2022-2028, would seriously injure the amenities of property both within the proposed development and in the vicinity, and would be prejudicial to public health.
2. Having regard to the deficiencies in the Surface Water and SuDS strategy which form part of the application, it is considered that the applicant has failed to demonstrate that the proposed development will

not have a significant negative impact on the quality of water within the Carricklawn stream, which is a hydrological link with Slaney River Valley SAC and the Wexford Harbour and Slobs SPA, and where there is an objective under the Water Framework Directive to prevent deterioration of its status. The proposed development would therefore contravene objectives WQ15, NH04 and NH08 of the Wexford County Development Plan 2022-2028 and be contrary to the proper planning and sustainable development of the area.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Béibhinn O'Shea
Senior Planning Inspector
19th June 2025

WFD IMPACT ASSESSMENT STAGE 1: SCREENING			
Step 1: Nature of the Project, the Site and Locality			
An Bord Pleanála ref. no.	**320493-24**	**Townland, address**	Site located between R730 and Old Hospital Road, at Park & Stoneybatter, Wexford
Description of project		92 dwellings and creche	
Brief site description, relevant to WFD Screening,		Site of 3.17 ha boundary on three sides by roads infrastructure and residential development to east. The Carricklawn Stream flows in northeasterly direction within the north-western portion of the site and along the site boundary, and is then culverted. Northern portion of site within flood zone. There is a history of flooding in the area. Greenfield and largely overgrown, reeds/rushes present in the middle/northern portion. The site rises from north to south with a difference in levels of approximately 15 m.	
Proposed surface water details		Stream within the site. Surface water network, incorporating some SuDS features (permeable car-parking, tree pits, filter drains with excess going to network) discharging to stream via attenuation tank and hydrocarbon interceptor.	
Proposed water supply source & available capacity		Public water supply. Confirmation of feasibility submitted.	

Proposed wastewater treatment system & available capacity, other issues	Public wastewater system. Connection feasible subject to upgrades
Others?	Not applicable

Step 2: Identification of relevant water bodies and Step 3: S-P-R connection

Identified water body	Distance to (m)	Water body name(s) (code)	WFD Status	Risk of not achieving WFD Objective e.g.at risk, review, not at risk	Identified pressures on that water body	Pathway linkage to water feature (e.g. surface run-off, drainage, groundwater)
River Waterbody	0m Within site	COOLREE STREAM_010 IE_SE_12C130100	Good	Review[1]	Not identified	Surface run off, discharge from surface water network

[1] Waterbodies that are categorised as Review either because additional information is needed to determine their status before resources and more targeted measures are initiated or the measures have been undertaken, e.g. a wastewater treatment plant upgrade, but the outcome hasn't yet been measured/monitored.

Groundwater waterbody	Underlying site	Castlebridge North IE_SE_G_031	Good	Not at risk	None		Maps indicate well drained soil in much of site, alluvium to north, poorly drained to west.
Step 4: Detailed description of any component of the development or activity that may cause a risk of not achieving the WFD Objectives having regard to the S-P-R linkage.							
CONSTRUCTION PHASE							
No.	Component	Water body receptor (EPA Code)	Pathway (existing and new)	Potential for impact/ what is the possible impact	Screening Stage Mitigation Measure*	Residual Risk (yes/no) Detail	**Determination** to proceed to Stage 2. Is there a risk to the water environment? (if 'screened' in or 'uncertain' proceed to Stage 2.**
1.	Surface	COOLREE STREAM_010	Surface Run Off	Siltation, contaminated run-off.	Standard Construction	No	Screened out

					Measures / Conditions CEMP.		
2	Surface	COOLREE STREAM_010	Surface Run Off	Hydro morphological change resulting from proposed footpath provision at northern site boundary.	Inspector's Addendum Report recommends omission of footpath.	No, subject to omission of footpath	Screened out
3.	Ground	Castlebridge North	Drainage	Hydrocarbon Spillages	Standard Construction Measures / Conditions CEMP	No	Screened out
OPERATIONAL PHASE							
3.	Surface	COOLREE STREAM_010	Surface run-off	Contaminated run-off	SuDS features, attenuation tank, petrol interceptor	Yes. Failure in Surface Water strategy to consider	Screened in

						increased run-off volumes from roofs, footpaths and other impermeable areas, and filter drains, and to demonstrate capacity of the surface water network and attenuation tank to cater for same. Together with absence of proposed site levels/contours, there is a risk of pluvial flooding and uncontrolled overland flow of untreated surface	

						water directly to watercourse.	
4.	Ground	Castlebridge North	None	None	None	No	Screened out
DEBOARDING PHASE							
5.	NA						

STAGE 2: ASSESSMENT

Details of Mitigation Required to Comply with WFD Objectives – Template

Surface Water

Development/Activity e.g. culvert, bridge, other crossing, diversion, outfall, etc	**Objective 1:Surface Water** **Prevent deterioration of the status of all bodies of surface water**	**Objective 2:Surface Water** **Protect, enhance and restore all bodies of surface water with aim of achieving good status**	**Objective 3:Surface Water** **Protect and enhance all artificial and heavily modified bodies of water with aim of achieving good ecological potential and good surface**	**Objective 4: Surface Water** **Progressively reduce pollution from priority substances and cease or phase out emission, discharges and losses of priority substances**	**Does this component comply with WFD Objectives 1, 2, 3 & 4? (if answer is no, a development cannot proceed without a derogation under art. 4.7)**

			water chemical status		
	Describe mitigation required to meet objective 1:	**Describe mitigation required to meet objective 2:**	**Describe mitigation required to meet objective 3:**	**Describe mitigation required to meet objective 4:**	
Surface water drainage	Adequately designed SUDs features, sufficient capacity in SW network and attenuation tank, adequate consideration of proposed site levels/contours in terms of future overland flow.	Adequately designed SUDs features, sufficient capacity in SW network and attenuation tank, adequate consideration of proposed site levels/contours in terms of future overland flow.	NA	NA	NO The application has not clearly demonstrated adequate capacity in the surface water network and attenuation tank, and has not provided adequate proposed site levels/contours in relation to overland flow. Therefore there remains potential for uncontrolled flow of contaminated surface water to the Carricklawn Stream, which conflicts with objective 1 and objective 2 of the WFD.
Details of Mitigation Required to Comply with WFD Objectives – Template					
Groundwater					

Development/Activity e.g. abstraction, outfall, etc.	**<u>Objective 1: Groundwater</u> Prevent or limit the input of pollutants into groundwater and to prevent the deterioration of the status of all bodies of groundwater**	**<u>Objective 2 : Groundwater</u> Protect, enhance and restore all bodies of groundwater, ensure a balance between abstraction and recharge, with the aim of achieving good status***	**<u>Objective 3:Groundwater</u> Reverse any significant and sustained upward trend in the concentration of any pollutant resulting from the impact of human activity**	**Does this component comply with WFD Objectives 1, 2, 3 & 4? (if answer is no, a development cannot proceed without a derogation under art. 4.7)**
	Describe mitigation required to meet objective 1:	Describe mitigation required to meet objective 2:	Describe mitigation required to meet objective 3:	
Development Activity 1 :	N/A	N/A	N/A	N/A
Development Activity 2	N/A	N/A	N/A	N/A