



An
Coimisiún
Pleanála

Inspector's Report ABP-322775-25

Development	Demolition of building, construction of extension of guesthouse, conversion of lounge area and all associated site works
Location	Hildan House, Lispopple, Swords, Co. Dublin, K67 Y392
Planning Authority	Fingal County Council
Planning Authority Reg. Ref.	F25A/0258E
Applicant(s)	Hazelwood Walk Holdings Limited
Type of Application	Permission
Planning Authority Decision	Refuse Permission
Type of Appeal	First Party vs. Refusal
Appellant(s)	Hazelwood Walk Holdings Limited
Observer(s)	None
Date of Site Inspection	15 th of September 2025
Inspector	Stephen Ward

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1.0 Site Location and Description

- 1.1. The site (0.615ha) is located at Lispopple, a rural area c. 2km northwest of the built-up edge of Swords. It is located along the southern side of regional road R125 and contains an existing guesthouse known as Hildan House. This is a large building of 833m² which is mainly 2-storey, but which also includes a single-storey section along the roadside to the front. It is indicated that the building comprises 19 no. guest bedrooms and a single-storey annex containing a kitchen/living/dining room and 4 no. bedrooms. There is an existing vehicular entrance at the northern site corner, and an access road and parking area (37 spaces) extends along the northwest and southwest portions of the site. There is a detached single-storey office building in the western corner of the site.
- 1.2. The surrounding area to the east, west and south is generally undeveloped, although Portrane Reservoir is to the south of the site. A tributary of the Broadmeadow River flows from the reservoir in a northeast direction close to the southeast site boundary. Roganstown Hotel & Country Club is located on the opposite (northern) side of the R125 road.

2.0 Proposed Development

- 2.1. In summary, it is proposed to carry out demolitions and extensions to the existing building to provide for a 24 no. bedroom guesthouse, comprising 24 no. double rooms, a 4 no. bedroom private residence comprising 2 no. double rooms and 2 no. single rooms, and served by 51 no. car parking spaces. The individual elements are described as follows:
 - (i) demolition of single-storey annex building to the front of Hildan House (70m²);
 - (ii) construction of a two-storey extension to rear of existing guesthouse to accommodate 8 no. ensuite double-bedrooms and associated lift, stairwell and circulation space (270m²);
 - (iii) conversion of communal lounge area to provide 2 no. ensuite double-bedrooms;
 - (iv) revision of external car park to provide for 14 no. additional vehicular parking spaces; and

(v) all ancillary works, including SuDS drainage and landscaping, necessary to facilitate the development.

- 2.2. The surface water proposals include permeable paving and attenuation and will discharge to an on-site soakaway. It is proposed to connect to the existing watermains along the adjoining R125 regional road. The application outlined that all foul water from the site will discharge to the public system (along R125, c. 400m to the southeast of site) via a pumping chamber and rising main, although the appeal outlines that this element is now completed and operational.

3.0 Planning Authority Decision

3.1. Decision

By Order dated 20th May 2025, Fingal County Council (FCC) made a decision to refuse permission for the following reasons:

1. It is considered that the proposal, by reason of its scale and intensification proposed, in addition with the lack of information submitted, is contrary to the RU zoning objective which permits in principle guest houses only, where the use is ancillary to the use of the dwelling as a main residence. Furthermore it is contrary to Objective EE058 of the Fingal Development Plan 2023-2029, which supports extensions to existing dwellings for the purpose of Bed and Breakfast or Guest House Accommodation within areas which have zoning objectives RU, provided the size, design, surface water management and foul drainage arrangements for the proposed development does not erode the rural quality and character of the surrounding area and would therefore be contrary to the proper planning and sustainable development of the area.
2. The applicant has not adequately demonstrated the proposed development would not endanger public safety by reason of a traffic hazard as the required sightlines have not been demonstrated on both sides of the existing vehicular entrance onto the R125. It is therefore considered that the proposal would intensify the use of the site and may result in a traffic hazard and therefore would be contrary to the proper planning and sustainable development of the area.

3. As a consequence of insufficient information submitted on both the existing and proposed wastewater treatment it cannot be concluded that the development, would not cause serious water pollution, and for that reason be a serious danger to human health and the environment. The absence of evidence that the proposal would not result in a significant impact on the conservation objectives of European sites, precludes the planning authority from permitting the proposal.

In addition, having regard to the characteristic of the tributary of the Broadmeadow River, which runs along the southern boundary of the site and given the Broadmeadow River tributary's connection to the Broadmeadow Swords Estuary Special Protection Area (004025), the applicant has failed to demonstrate that the proposed development individually, or in combination, with other plans or projects would not adversely affect the integrity of nearby European Sites. The proposed development would be contrary to Objective DMSO1 and DMSO145 of the Fingal Development Plan 2023-2029 which seeks to Ensure that sufficient information is provided as part of development proposals to enable Screening for Appropriate Assessment to be undertaken and to enable a fully informed assessment of impacts on biodiversity to be made.

The development would, therefore, be contrary to the proper planning and sustainable development of the area.

4. The site is located on RU zoned lands on the R125, which has a specific objective to 'preserve views' and in the absence of a landscape plan the development is considered to have an overbearing impact on the site context and would, therefore, be contrary to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. Planning Reports

The main aspects of the assessment can be summarised under the following headings.

Zoning & Principle

- Although a private residence will be retained, the extension proposal intensifies the guesthouse use such that it is no longer ancillary to the main residence.
- Therefore, the proposal is contrary to the 'RU' zoning and CDP Objective EEO58.

Visual Amenity

- The proposed extension sits on an elevated site within the Landscape Character Type: Rolling Hills with Tree Belts, which is of Medium Landscape Sensitivity, and an objective to Preserve Views is indicated on the Green Infrastructure Map Sheet no. 3 of the Fingal Development Plan 2023-2029 along the eastern site boundary.
- In the absence of a landscape plan indicating proper and sensitive screening from views and the watercourse to the south, the proposed development is considered to have an overbearing impact on the site context, and the applicant has failed to overcome the previous reason for refusal in this regard.

Transportation

- The demonstrated sightline to the left on exit is substandard and requires setback (not trimming) with written consent.
- The application outlines proposals for a shuttle bus service but the planning authority questions the enforceability of same.
- The proposed parking exceeds the permitted spaces as per the CDP and the Compact Settlement Guidelines.
- Bicycle parking has not been provided in accordance with CDP requirements (Table 14.17).
- Refusal is recommended having regard to the above.

Water & Drainage

- The FCC Water Services Section has highlighted the need for further information on surface water proposals.
- There is inadequate detail to demonstrate how/if the proposed foul water connection can be achieved. There is no correspondence from Irish Water or

details of the proposed pumping chamber. Permission should be refused in this regard.

AA Screening

- There is inadequate detail to determine that there would not be a pathway between the proposed development and European Sites (Malahide Estuary SAC, Broadmeadow Swords Estuary Special Protection Area), or that it would not lead to a significant impact on the conservation objectives of these Natura 2000 sites.

Conclusion

- Based on the aforementioned concerns, the report recommends to refuse permission and this forms the basis of the FCC decision.

3.2.2. Other Technical Reports

Water Services

- Requests further information on the surface water proposals.

Parks & Green Infrastructure

- No objection subject to agreement of landscaping details.

Transportation Planning

Highlights concerns and requests further information relating to:

- Bicycle Parking proposals.
- Proposals to reduce car parking (maximum 38 spaces).
- Proposals for accessible and EV parking.
- Sightline proposals on the exit to the left.

Air & Noise Unit

- No objection subject to condition.

3.3. Prescribed Bodies

DAA – No comment other than to recommend consultation with the IAA and AirNav Ireland.

IFI – Highlights the site location within the Broadmeadow catchment and the need to apply salmonoid waters constraints. Recommends the use of nature-based surface water treatment; confirmation that foul and storm water infrastructure has adequate capacity; protection of watercourses and groundwater; and appropriate environmental protection measures in accordance with legislation.

3.4. Third Party Observations

None.

4.0 Planning History

There is a long history of applications associated with alterations and extensions of the existing structures on site (See FCC Planner's Report for details). The most recent relevant planning history is as follows:

ABP-316035-23 (P.A. Reg. Ref. F22A/0685): On 11th July 2023, the Board upheld the FCC decision to refuse permission for:

- (i) Construction of a two-storey extension to rear of existing guesthouse to accommodate 12 number ensuite double-bedrooms and ancillary lift, stairwell and circulation space,
- (ii) revision of external car park to provide for 14 number additional vehicular parking spaces;
- (iii) ancillary works, including SuDS drainage and landscaping, necessary to facilitate the development. The proposed works involved an increase in the number of bedrooms within the guesthouse from 18 number to 30 number and the number of vehicular parking spaces serving the guesthouse from 37 number to 51 number.

The reasons for refusal were as follows:

1. It is considered that the proposed development would endanger public safety by reason of a traffic hazard because of the additional traffic turning movements the development would generate on the R125 road at a point where sightlines are restricted in a south easterly direction.

2. Having regard to: -

- (a) the characteristics of the tributary of the Broadmeadow River, which runs along the southern boundary of the site, including the baseline water quality information provided in the course of the planning application and appeal, and
- (b) Article 5 of the European Communities Environmental Objectives (Surface Waters) Regulations 2009, which requires that a public body in the performance of its functions shall not undertake those functions in a manner that knowing causes or allows deterioration in the chemical or ecological status of a body of surface water,

the Board is not satisfied that the river has sufficient assimilated capacity to accept treated effluent from the on-site wastewater system currently in-situ or proposed development in conjunction with treated effluent from other existing and committed development, given the Broadmeadow river tributary's connection to the Broadmeadow Swords Estuary Special Protection Area (004025). It is considered that the absence of evidence that the proposal would not result in a significant impact on the conservation objectives of European sites, precludes the Board from permitting the proposal. The proposed development would therefore pose an unacceptable risk of environmental pollution and be contrary to the proper planning and sustainable development of the area.

3. It is considered that by reason of its nature, height, bulk and scale the proposed development, would be visually obtrusive at this open rural area, on 'RU' zoned lands, which have the objective to 'protect and promote in a balanced way, the development of agriculture and rural-related enterprise, biodiversity, the rural landscape, and the built and cultural heritage', and at a location on the R125 which has a specific objective to 'preserve views' and would, therefore, be contrary to the proper planning and sustainable development of the area.

5.0 Policy Context

5.1. Fingal County Development Plan 2023-2029

The relevant provisions of the CDP can be summarised under the following headings.

Zoning

The site is within the 'RU-Rural' zone, the objective for which is to '*Protect and promote in a balanced way, the development of agriculture and rural-related enterprise, biodiversity, the rural landscape, and the built and cultural heritage*'.

As per s. 13.5 of the CDP, the vision for the zone is to protect and promote the value of the rural area of the County. This rural value is based on:

- Agricultural and rural economic resources
- Visual remoteness from significant and distinctive urban influences
- A high level of natural features.

Agriculture and rural related resources will be employed for the benefit of the local and wider population. Building upon the rural value will require a balanced approach involving the protection and promotion of rural biodiversity, promotion of the integrity of the landscape, and enhancement of the built and cultural heritage.

Landscape

The site is within the Landscape Character Type 'Rolling Hills with Trees Belts', which is of 'modest value' and 'medium' sensitivity.

The southern end of the site is within the 'Parks Biodiversity Nature Development Area' associated with Portrane Reservoir.

The CDP (Sheet No. 3) indicates a 'Specific Objective to 'Preserve Views' along the adjoining R125 road.

Objective GINHO60 'Protection of Views and Prospects' is to '*Protect views and prospects that contribute to the character of the landscape, particularly those identified in the Development Plan, from inappropriate development*'.

Employment and Economy

Relevant policies and objectives include:

EEO45 - Promote and facilitate tourism as one of the key economic pillars of the County's economy and a major generator of employment and to support the provision of necessary significant increase in facilities such as hotels, aparthotels, tourist hostels, cafes and restaurants, visitor attractions, including those for children.

EEP22 - Support development of tourism infrastructure, visitor attractions and supporting facilities at appropriate locations in the County in a manner that does not have an adverse impact on the receiving areas and the receiving environment.

EEO47 - Ensure the economic benefits associated with promoting the County's natural, cultural and built heritage are balanced with due consideration for their conservation and protection.

EEO49 - Promote opportunities for enterprise and employment creation in rural-based tourism where it can be demonstrated that the resultant development will not have a negative impact on the receiving rural environment.

EEO58 - Support proposed extensions to existing dwellings, within areas which have zoning objectives, RU, GB, HA, RV, or RC, which provide for bed and breakfast or guest house accommodation where the size, design, surface water management and foul drainage arrangements for the proposed development does not erode the rural quality and character of the surrounding area.

EEO72 - Permit home-based economic activities in existing dwellings, where by virtue of their nature and scale, the activities can be accommodated such that the proposed activity does not impact in an excessively negative way on: i. The operation of agriculture or horticulture farms in the vicinity, ii. The rural ecology and landscape of the area, iii. Any adjacent residential use, iv. The primary use of the dwelling as a residence.

5.2. Natural Heritage Designations

The nearest Natura 2000 sites are the Malahide Estuary Special Area of Conservation (c. 4.5km to the southeast) and the Malahide Estuary Special Protection Area (c. 4.8km to the southeast).

5.3. EIA Screening

The proposed development is not a class for the purposes of EIA as per the classes of development set out in Schedule 5 of the Planning and Development Regulations 2001, as amended (or Part V of the 1994 Roads Regulations). No mandatory requirement for EIA therefore arises and there is also no requirement for a screening determination. Refer to Form 1 in Appendix 1 of report.

6.0 The Appeal

6.1. Grounds of Appeal

The appeal reiterates much of the Planning Report submitted with the application, including a section outlining compliance with local, regional, and national policy. The grounds of appeal can be summarised under the following headings.

Scale, Intensification, Rural Quality and Character

- The development is not overbearing and can be absorbed due to limited visibility.
- The majority of the development is to the rear of the existing building and will integrate well with the existing building/site and maintain protected views.
- A landscaping scheme has been included to ensure proper screening and protection of views/character in the area. In addition to this, photomontages have been prepared at application stage incorporating proposed landscaping and screening at the most sensitive viewpoints (Figures 29-31). The proposed development would not alter the scale/design of the original development to become visually dominant.
- Consistent with CDP Objective EEO58 and the zoning objective for the site, the development would not erode the quality and character of the area.

Traffic Hazard & Sightlines

- Appendix B of the appeal includes a 'Transport Note' by TENT Engineering which fully addresses the planning authority's traffic hazard concerns.
- The proposed sightlines are considered appropriate and will not result in any serious traffic hazard.

- Although there may be a minor traffic increase, there have been no reported incidents in the past regarding traffic volumes.
- Although the sightline proposal submitted to FCC was below the 105-metre guidance to the left of the entrance, alterations are now submitted to include roadside hedgerow cutback/recess to ensure adequate sightlines of at least 113m to the north (left) and similarly improved sightlines to the south.

Wastewater Treatment and Screening for Appropriate Assessment

- Appendix B of the appeal includes a report by TENT Engineering which provides further information on the Wastewater Treatment Plan. It outlines that there will be no serious water pollution or significant impact on the conservation objectives of European Sites.
- A fully sealed dedicated underground holding tank and pumped foul water system have already been installed and is operational on site, which conveys all wastewater to the public foul sewer network (c. 400m off site), completely avoiding any on-site discharge.
- With the above solution in place, the potential for significant effects on any European Site has been effectively ruled out at screening stage.
- In response to CDP Objectives DMSO1 and DMSO145, an AA Screening Report has been included in the appeal which concludes that there will be no significant effects on Natura 2000 sites.

6.2. Planning Authority Response

The response largely reiterates the concerns outlined in the original FCC Planner's Report and requests the Commission to uphold the FCC decision.

In the event of a successful appeal, provision should be made for:

- A financial contribution and/or a provision for any shortfall in open space and/or any Special Development Contributions required in accordance with Fingal County Council's Section 48 Development Contribution Scheme.
- Conditions should also be included where a tree bond or a contribution in respect of a shortfall of play provision facilities are required.

6.3. Observations

None.

6.4. Further Responses

None.

7.0 Assessment

7.1. I have examined the application details and all other documentation on file, including all of the submissions received in relation to the appeal, the reports of the local authority and prescribed bodies, and I have inspected the site and had regard to the relevant local/regional/national policies and guidance. I consider that the substantive issues to be considered in this appeal are as follows:

- The Principle of the Development
- Traffic and Transport
- Wastewater & Surface Water
- Visual Amenity
- Appropriate Assessment (See section 9)

7.2. The Principle of the Development

7.2.1. The site is within the 'RU-Rural' zone as per the CDP, the objective for which is to '*Protect and promote in a balanced way, the development of agriculture and rural-related enterprise, biodiversity, the rural landscape, and the built and cultural heritage*'. According to S. 13.5 of the CDP, a 'guest house' use is 'permitted in principle' within the 'RU' zone, 'where the use is ancillary to the use of the dwelling as a main residence'.

7.2.2. The question of ancillary use is therefore a key consideration, and I would have some reservations in this regard, as follows:

- While the existing building includes a 'self-contained' 4-bedroom single-storey unit to the front, it is this unit itself that is described as 'the ancillary structure' in section 3.2 of the applicant's Planning Report.
- The unit described above accounts for only c. 8.4% of the existing floor area and is to be demolished as part of the proposed development.
- From my internal inspection of the building, the unit described above would appear to be in use for guests, consistent with the remainder of the building.
- While section 5.1.1. of the applicant's Planning Report outlines that the proposed guesthouse would be provided as an ancillary activity to the proposed 'main residence', which is described as a 4-bedroom dwelling on the northern side of the first floor, this unit would still be just c. 10% of the overall floor area and is not designed in a manner that is easily identifiable as a 'main residence'.

7.2.3. Having regard to the above, I do not consider that either the existing or proposed development would constitute a guesthouse use which is ancillary to the use of a dwelling as a main residence and which can be considered 'permitted in principle'. However, a guesthouse use which is not ancillary to the use of a dwelling as a main residence is, at the same time, not specifically listed as being 'not permitted' in S. 13.5 of the CDP. In this regard, the CDP outlines that uses which are neither 'Permitted in Principle' nor 'Not Permitted' will be assessed in terms of their contribution towards the achievement of the Zoning Objective and Vision and their compliance and consistency with the policies and objectives of the Development Plan. I consider that the proposed development should be assessed on this basis and that it would not materially contravene either Section 13.5 or the 'RU' zoning objective of the CDP. The suitability of the proposed development in terms of the Zoning Objective and Vision and other relevant policies and objectives of the CDP will be considered throughout this report.

7.2.4. Furthermore, with regard to the existing development, it is important to also consider Section 13.3 of the CDP and 'Non-Conforming Uses'. In this regard, Objective ZO3 is to 'Generally, permit reasonable intensification of extensions to and improvement of premises accommodating non-conforming uses, subject to normal planning criteria'. Therefore, given that the nature and scale of the existing guesthouse use is

already non-ancillary to a main residence, any determination that such a use was 'not permitted' would render the existing development to be a 'Non-Conforming Use'. In such a case, notwithstanding the RU zoning objective, I consider that reasonable intensification of, extensions to, and improvement of, the existing development would be acceptable in principle, subject to normal planning criteria. The relevant planning criteria will be considered in the following sections of this report.

- 7.2.5. I also note that the FCC decision outlines that the proposed development would be contrary to Objective EEO58 of the CDP. This objective states as follows:

'Support proposed extensions to existing dwellings, within areas which have zoning objectives, RU, GB, HA, RV, or RC, which provide for bed and breakfast or guest house accommodation where the size, design, surface water management and foul drainage arrangements for the proposed development does not erode the rural quality and character of the surrounding area.'

- 7.2.6. This objective clearly relates to proposals to extend existing dwellings to provide guest house accommodation. However, the current proposal does not involve the extension of an existing dwelling (the 'existing dwelling' is to be demolished) but rather should be considered as extensions and alterations to an existing guesthouse development. Accordingly, I do not consider that Objective EEO58 is directly applicable to the development. In any case, I note that the objective supports such proposals subject to the proviso that the size, design, surface water management and foul drainage arrangements for the proposed development does not erode the rural quality and character of the surrounding area. As will be outlined in later sections of this report, I do not that any such erosion of rural quality or character would arise, or that the proposed development would be contrary to Objective EEO58.

- 7.2.7. In conclusion, I consider that the proposed development would not materially contravene Section 13.5 or the RU zoning objective for the site, and that the proposal for extensions and alterations to the existing development would be acceptable in principle in accordance subject to further consideration of relevant planning criteria, which will be outlined in the following sections.

7.3. Traffic and Transport

- 7.3.1. While the wider area is served by bus services such as the 41B, 192 and 197, the site itself is c. 1km from the nearest bus stop and is not served by pedestrian/cyclist facilities. And while the application indicates that it is proposed to provide a private bus service for guests, I would concur with the concerns of the planning authority about whether any such facility would be reasonably enforceable. Accordingly, I would accept that the proposed development is effectively dependant on private vehicular transport.

Sightlines

- 7.3.2. In relation to traffic turning movements and road safety, the FCC decision outlines concerns that sightlines have not been adequately demonstrated from the existing/proposed exit in both directions. The FCC Planner's Report and Transportation Section Report state that the sightline to the right (southeast) is acceptable but highlight concern about sightlines to the left (northwest) of the exit and the need to provide roadside boundary setback (not trimming) with written consent from the relevant landowner to achieve sightlines of 113m to the centreline of the road.
- 7.3.3. In response to these concerns, the appeal includes a revised proposal to cutback/recess the hedgerow to the northwest of the exit to achieve sightlines of 113m to the centreline of the road. The affected area is included within the site boundary and is accompanied by written consent from the adjoining landowner to 'remove enough roadside hedgerow...in order to improve the sight lines'. I consider that this proposal satisfactorily addresses the requirements of the planning authority; that it can be achieved as a condition of any grant of permission; and that the sightlines would be adequate to prevent any unacceptable traffic hazard.
- 7.3.4. I note that the Board's decision under ABP-316035-23 included a refusal reason relating to inadequate sightlines to the southeast. However, the current proposal is significantly different in that it involves the removal of the single-storey roadside section of the building to facilitate significantly improved sightlines. The applicant's proposals demonstrate sightlines of 105m (both vertical and horizontal alignment) and, consistent with the FCC position, I am satisfied that this is acceptable subject to the removal of all roadside obstructions within this viewshed.

- 7.3.5. In conclusion, I acknowledge that the existing entrance/exit arrangements are substandard with limited visibility and that the proposed development involves an intensification of use. However, the intensification would be limited, involving just 5 additional bedrooms. Furthermore, the application involves significant improvements to the available sightlines, and, on balance, I consider that the proposed development would result in improved traffic safety standards. In the event of a grant of permission, a condition should be attached to require agreement of the details of sightlines and roadside boundary setbacks, and to specify that any further demolition/construction works should not be commenced until the sightlines are achieved to the satisfaction of the planning authority.

Parking

- 7.3.6. The planning authority has outlined concerns that the proposal for 51 no. car-parking spaces would exceed the requirements of the CDP and Compact Settlement Guidelines.
- 7.3.7. Consistent with the FCC view, I would acknowledge that the site is within Car Parking Zone 2. As per Table 14.18 of the CDP, a 'norm' of 1 space per bedroom applies for a guesthouse in Zone 2, while 2 spaces would apply for a 4-bed house. This results in a 'norm' standard of 26 spaces. In this regard, 'norm' refers to the number of spaces that will generally be permitted unless specific changes are considered necessary to ensure the proper planning and sustainable development of a proposed development. In addition to the above, I note that the Compact Settlement Guidelines (SPPR 3) outlines a maximum of 2 spaces for a dwelling in a 'Peripheral' location such as this, which would be consistent with the CDP 'norm' above.
- 7.3.8. Given that there are already 37 no. car-parking spaces on site, I consider it reasonable that the CDP 'norm' standard of 26 spaces can be exceeded. Furthermore, I would highlight that this is not a CDP 'Maximum' standard and therefore there is no material contravention of the CDP. However, consistent with FCC view, I consider that the proposal for 51 spaces is excessive and should be limited to the existing provision of 37. Therefore, any additional spaces should be omitted as a condition of any permission.

- 7.3.9. In addition to standard car parking numbers, I acknowledge CDP requirements in relation to bicycle parking (Table 14.17), accessible parking (minimum 5% as per s. 14.17.8), and EV parking (minimum 10% as per s. 14.17.10). However, I am satisfied that there is ample room within the site to accommodate such requirements and the details of same can be agreed as a condition of any permission.

7.4. Wastewater & Surface Water

Wastewater

- 7.4.1. While the existing development would appear to rely on on-site wastewater disposal, the application originally proposed that all foul water from the site would discharge to the public system (along R125, c. 400m to the southeast of site) via a proposed pumping chamber and rising main.
- 7.4.2. I note that the planning authority raised concerns about detail of these proposals, including: how/if this could be achieved outside the site boundary; lack of correspondence from Uisce Eireann; and inadequate details of the proposed pumping chamber and connection agreement.
- 7.4.3. However, the TENT Engineering report submitted with the appeal confirms that a new underground holding tank and pump have since been installed on site, which pumps all effluent c. 400m off-site to a designated Uisce Eireann foul sewer manhole to the east. The report confirms that the upgrade has been completed, tested, and is fully operational, and that Uisce Eireann has been consulted during this process.
- 7.4.4. Although these works have been carried out separately to the proposed development, I am satisfied that the connection to the public wastewater system significantly improves the previous wastewater arrangements and satisfactorily addresses the risk of wastewater pollution associated with the development (including potential pollution the Broadmeadow tributary to the south).

Surface Water

- 7.4.5. The application proposed that the enlarged parking area would be surfaced with permeable paving and that surface water would be directed via a series of gullies to an on-site soakaway. I note that the FCC Water Services section outlined the need for further information on these proposals, including details of the proposed permeable paving and soakaway design.

7.4.6. In response, I note that the Tent Engineering drawings submitted with the appeal include a site layout plan showing the 'Proposed Surface Water Strategy' as well as indicative section drawings of the proposed permeable paving and soakaway. In principle, I am satisfied that the proposed strategy is acceptable; that it would be an improvement on existing arrangements; and that it would satisfactorily address the potential for pollution of surrounding watercourses (including the Broadmeadow tributary to the south). I acknowledge that the extent of permeable paving would be reduced as a result of the reduced parking requirements previously discussed. However, this and all other surface water arrangements can be agreed in accordance with FCC requirements as a condition of any permission.

7.5. Visual Amenity

- 7.5.1. The planning authority has highlighted the need to protect the rural character and quality of the area in accordance with the RU zoning objective and Objective EEO58. It has also highlighted the location of the site within the Landscape Character Type: Rolling Hills with Tree Belts, and the objective to Preserve Views along the adjoining road.
- 7.5.2. I acknowledge the location of the site within the Landscape Character Type 'Rolling Hills with Trees Belts' but would highlight that the CDP classifies this landscape as being of only 'modest value' and 'medium' sensitivity. I also acknowledge that Map Sheet no. 3 of the CDP includes an objective to preserve views along the adjoining R125 road and that CDP Objective GINHO60 is to '*Protect views and prospects that contribute to the character of the landscape, particularly those identified in the Development Plan, from inappropriate development*'. However, no particular views to be preserved are specified for this or any other section of the road.
- 7.5.3. Notwithstanding the above CDP provisions, I consider that the site is not particularly sensitive or exposed. Although it is elevated in relation to a localised dip to the south of the site, it is otherwise generally consistent with the wider ground levels. The approaches to the site are well screened by existing trees and hedgerows, meaning that the visibility of the site is quite localised. The site itself is also well enclosed by existing trees and hedgerows to the northwest, south, and southeast, meaning that there are no significant views available beyond the site from the adjoining road.

- 7.5.4. The proposed development involves the removal of the existing roadside single-storey element, which would mitigate the localised impact of the existing development to some extent. I acknowledge that it is proposed to add a 2-storey extension to the south-eastern side of the building. However, this section would effectively be screened by the existing building and vegetation on the northern approach to the site. It would obviously be more visible on the southern approach. However, the height of the extension would be consistent with the existing southeast façade, and the width of the façade would not be excessively increased.
- 7.5.5. I note that the planning authority raised concerns about the overbearing impact of the development and objective to preserve views in the absence of a landscape plan for the development. In response, the appeal has included a Landscape Plan showing proposals for significant additional planting to the southeast of the development. I am satisfied that this will help to suitably mitigate the visual impact of the development.
- 7.5.6. Having regard to the foregoing, I am satisfied that the proposed development is of a suitable scale and design to integrate with the existing development without detracting from any views to be preserved or the rural character or quality of the area. Accordingly, I am satisfied that the proposed development would be acceptable in accordance with RU zoning objective and other relevant policies and objectives of the CDP.

8.0 Water Framework Directive Screening

- 8.1. The impact of the proposed development in terms of the WFD is set out in Appendix 3 of this report. The southern boundary of the site is within c. 10 metres of a tributary of the Broadmeadow River (EPA name Broadmeadow_040). The Broadmeadow River flows to the Broadmeadow transitional estuary (EPA name Broadmeadow Water) c. 4.75km to the east, and onwards to Malahide Bay (EPA name Malahide Bay) c. 8km to the east. The site is underlain by the Swords Groundwater body.
- 8.2. The WFD status of the Broadmeadow River, Broadmeadow estuary, and Malahide Bay is 'moderate' and all waterbodies are at risk of not achieving their WFD objectives. However, the status of the Swords ground waterbody is 'good' and it is 'not at risk' of not achieving its WFD objectives.

8.3. As per Appendix 3, I have outlined the potential pathways between the site and the relevant waterbodies and potential impacts at construction and operational stages. 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 associated mitigation measures, I am satisfied that it can be eliminated from further assessment because there is no residual risk to any surface and/or groundwater water bodies, either qualitatively or quantitatively.

8.4. The reasons for this conclusion are as follows:

- The nature and limited scale of the proposed works;
- The distance between the proposed development and relevant bodies, and/or the limited hydrological connectivity;
- The mitigation measures included as part of the application to address surface water and wastewater emissions.

8.5. I conclude on the basis of objective information, 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. Accordingly, the proposed development can be excluded from further assessment.

9.0 **AA Screening**

9.1. **Introduction**

The requirements of Article 6(3) of the Habitats Directive as related to appropriate assessment of a project under part XAB, sections 177U of the Planning and Development Act 2000 (as amended) are considered fully in this section. The areas addressed in this section are as follows:

- Compliance with Article 6(3) of the EU Habitats Directive

- Screening the need for appropriate assessment.

9.2. **Compliance with Article 6(3) of the EU Habitats Directive**

The Habitats Directive deals with the Conservation of Natural Habitats and of Wild Fauna and Flora throughout the European Union. Article 6(3) of this Directive requires that any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. The competent authority must be satisfied that the proposal will not adversely affect the integrity of the European site before consent can be given.

The proposed development is not directly connected to or necessary to the management of any European site and therefore is subject to the provisions of Article 6(3).

9.3. **Screening the need for Appropriate Assessment**

An AA Screening exercise has been completed (see Appendix 2 of this report for further details). In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on Malahide Estuary SPA or Malahide Estuary SAC in view of the conservation objectives of these sites, which are therefore excluded from further consideration. Appropriate Assessment is not required.

This determination is based on:

- The nature and scale of the proposed works and the standard construction and operational practice measures that would be implemented regardless of proximity to a European Site.
- The limited connectivity between the application site and the nearest European Sites as a result of significant distance, dispersal and dilution factors.

The possibility of significant effects on any other European sites has been excluded on the basis of objective information.

No measures intended to avoid or reduce harmful effects on European sites were taken into account in reaching this conclusion.

10.0 Recommendation

I recommend that permission be **GRANTED** for the proposed development, subject to conditions, and for the reasons and considerations set out below.

11.0 Reasons and Considerations

Having regard to the provisions of the Fingal Development Plan 2023-2029, including the 'RU' rural zoning objective for the site; the nature and extent of existing development on the site, the pattern and character of development in the area, and the design, scale and servicing of the proposed development; it is considered that, subject to compliance with the conditions set out below, the proposed development would constitute an acceptable intensification of an established use at this location, would not detract from views to be preserved or the rural character or quality of the area, would be acceptable in terms of traffic safety and convenience, and would not pose any unacceptable risk of water pollution or any associated impacts on downstream Natura 2000 sites. It is considered that the proposed development would be compliant with the provisions of the Fingal County Development Plan 2023-2029 and would be in accordance with the proper planning and sustainable development of the area.

12.0 Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, as amended by the additional plans and particulars submitted to An Coimisiún Pleanála with the appeal on the 16th of June 2025, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the Planning Authority, the developer shall agree

such details in writing with the Planning Authority prior to commencement of development, or as otherwise stipulated by conditions hereunder, and the development shall be carried out and completed in accordance with the agreed particulars. In default of agreement the matter(s) in dispute shall be referred to An Coimisiún Pleanála for determination.

Reason: In the interest of clarity.

2. (a) Sightlines from the existing entrance shall be achieved and maintained in accordance with the proposals submitted to An Coimisiún Pleanála with the appeal on the 16th of June 2025.
(b) A new roadside boundary shall be constructed behind the sightlines and all obstructions in the area between the sightlines and the roadside edge shall be removed, and the area shall be suitably levelled and surfaced.
(c) Details in respect of (a) and (b) above shall be submitted to, and agreed in writing with, the planning authority prior to the commencement of development on site.
(d) The proposals agreed under (c) above shall be completed to the written satisfaction of the planning authority prior to the commencement of any other demolition or construction works on site.

Reason: In the interest of traffic safety.

3. (a) No additional car-parking spaces are hereby permitted, and a maximum of 37 spaces shall be retained on site.
(b) Bicycle parking facilities shall be provided to comply with Table 14.17 of the Fingal Development Plan 2023-2029.
(c) A minimum of 5% of car-parking spaces shall be accessible spaces.
(d) A minimum of 10% of car-parking spaces shall be for Electric Vehicles.

Revised drawings showing compliance with these requirements shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development

Reason: In the interest of sustainable transport.

4. Details of the materials, colours and textures of all the external finishes to the proposed buildings shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Reason: In the interest of visual amenity.

5. All foul water from the proposed development shall be discharged to the Uisce Eireann foul sewer in accordance with the details submitted to An Coimisiún Pleanála with the appeal on the 16th of June 2025.

Reason: In the interest of public health and environmental protection.

6. The attenuation and disposal of surface water shall comply with the requirements of the planning authority for such works and services. Prior to the commencement of development, the developer shall submit details for the disposal of surface water from the site for the written agreement of the planning authority.

Reason: In the interest of public health and environmental protection.

7. (a) Except as required for the achievement of sightlines as required by condition number 2, all existing trees and hedges along the site boundaries shall be retained and protected from damage during construction.
(b) The site shall be landscaped in accordance with a comprehensive scheme of landscaping, details of which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Reason: In the interest of visual amenity.

8. Prior to the commencement of development, the developer or any agent acting on its behalf, shall prepare a Resource Waste Management Plan (RWMP) as set out in the EPA's Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for Construction and Demolition

Projects (2021) including demonstration of proposals to adhere to best practice and protocols. The RWMP shall include specific proposals as to how the RWMP will be measured and monitored for effectiveness; these details shall be placed on the file and retained as part of the public record. The RWMP must be submitted to the planning authority for written agreement prior to the commencement of development. All records (including for waste and all resources) pursuant to the agreed RWMP shall be made available for inspection at site offices at all times.

Reason: In the interest of sustainable waste management.

9. Prior to commencement of works, the developer shall submit to, and agree in writing with the planning authority, a Construction Environmental Management Plan, which shall be adhered to during construction. This plan shall provide details of intended construction practice for the development, including hours of working, noise and dust management measures, water protection measures, and traffic management.

Reason: In the interest of public safety and amenity.

10. The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Coimisiún Pleanála to determine the proper application of the terms of the Scheme.

Reason: It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission.

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.

Stephen Ward
Senior Planning Inspector

29th of September 2025

Appendix 1

Form 1 - EIA Pre-Screening

Case Reference	ABP-322775-25
Proposed Development Summary	Demolition of building, construction of extension of guesthouse, conversion of lounge area and all associated site works.
Development Address	Hildan House, Lispopple, Swords, Co. Dublin.
	In all cases check box /or leave blank
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (For the purposes of the Directive, "Project" means: - The execution of construction works or of other installations or schemes, - Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources)	☒ Yes, it is a 'Project'. Proceed to Q2.
	☐ No, No further action required.
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
☐ Yes, it is a Class specified in Part 1. EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.	
☒ No, it is not a Class specified in Part 1. Proceed to Q3	
3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?	
☒ No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed	

type of proposed road development under Article 8 of the Roads Regulations, 1994. No Screening required.	
☐ Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	State the Class and state the relevant threshold
☐ Yes, the proposed development is of a Class but is sub-threshold. Preliminary examination required. (Form 2) OR If Schedule 7A information submitted proceed to Q4. (Form 3 Required)	State the Class and state the relevant threshold

4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
Yes ☐	
No ☒	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: _____ Date: _____

Appendix 2

AA Screening Determination

Screening for Appropriate Assessment Test for likely significant effects	
Step 1: Description of the project and local site characteristics	
Brief description of project	Demolition of building, construction of extension of guesthouse, conversion of lounge area and all associated site works.
Brief description of development site characteristics and potential impact mechanisms	The site (0.615ha) is located in a rural area and contains an existing guesthouse known as Hildan House. There is a large parking area at the western end of the site, but the majority of the site (at the eastern end) consists of undeveloped grassland. There is a tributary of the Broadmeadow River c. 10m to the south of the site. It flows in a northeast direction to join with the Broadmeadow River, which then flows eastward towards Broadmeadow Estuary/Malahide Bay. This Estuary/Bay area is designated as Malahide Estuary SAC / SPA, which are c. 4.5km and 4.8km respectively from the site. The surface water proposals include permeable paving and attenuation and will discharge to an on-site soakaway. Foul water will discharge to the public system (along R125, c. 400m to the southeast of site) via a pumping chamber and rising main recently installed on site.
Screening report	Yes. Submitted with the appeal (Prepared by Hughes Planning)
Natura Impact Statement	No
Relevant submissions	The FCC decision outlines that, on the basis of insufficient information on wastewater treatment and potential serious water pollution, the planning authority is not satisfied that the proposed development individually, or in combination, with other plans or projects would not adversely affect the integrity of nearby European Sites. The planning authority received a submission from Inland Fisheries Ireland. It highlights the site location within the Broadmeadow catchment and

	the need to apply salmonoid waters constraints. It recommends the use of nature-based surface water treatment; confirmation that foul and storm water infrastructure has adequate capacity; protection of watercourses and groundwater; and appropriate environmental protection measures in accordance with legislation.
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Step 2. Identification of relevant European sites using the Source-pathway-receptor model

European Site (code)	Qualifying interests Link to conservation objectives (NPWS, date)	Distance from proposed development (km)	Ecological connections	Consider further in screening Y/N
Malahide Estuary SPA (004025)	Site Synopsis, QIs and Conservation Objectives are listed at the following link: https://www.npws.ie/protected-sites/spa/004025	4.8km	The stream to the south of the site provides a potential pathway from the appeal site.	Yes
Malahide Estuary SAC (000205)	Site Synopsis, QIs and Conservation Objectives are listed at the following link: https://www.npws.ie/protected-sites/sac/000205	1.6km	The stream to the south of the site provides a potential pathway from the appeal site.	Yes

I note that the applicant's AA Screening Report considers a wide range of other Natura 2000 sites within/adjoining the Irish Sea. However, having considered the Source-pathway-receptor model and the nature and limited scale of the proposed development, I do not consider these other sites to be within the zone of influence due to lack of connectivity and/or significant distance/dilution factors.

Step 3. Describe the likely effects of the project (if any, alone or in combination) on European Sites

Construction Phase

During the Construction Phase, surface / ground water run-off containing silt/sediments or other pollutants could inadvertently flow into the stream to the south of the site, which is linked to the Malahide SAC / SPA via the Broadmeadow River. However, having regard to the nature and limited scale of the proposed works, and the separation of the

development from the stream (c. 45m) and Natura 2000 sites (>4.5km), this potential pathway is considered insignificant.

Operational Phase

During the Operational Phase, surface water will be appropriately collected, attenuated, and discharged to an on-site soakaway, and wastewater will be discharged to the public system via the recently installed pumping station. Therefore, given that the adjoining stream will be suitably protected from pollution risk and the Natura 2000 sites are at a significant distance (>4.5km), this potential pathway is considered insignificant. Furthermore, I consider these surface water and wastewater measures to be standard practice measures that would be implemented regardless of proximity to a European Site (i.e. not mitigation for AA Screening purposes).

Other Effects

Although the construction and operational stages will lead to some increased disturbance, I do not consider that the Natura 2000 sites (c. 4.5km away) are within the disturbance Zone of Influence.

Having regard to the nature and size of the appeal site and its significant separation distance from the Natura 2000 sites, I do not consider that there is potential for significant ex-situ effects for any of the species associated with the surrounding European sites.

This is a standalone development and there are no other significant developments in the area that would act in-combination or cumulatively with the proposed development. Accordingly, I am satisfied that there is no potential for significant in-combination or cumulative effects on Natura 200 sites.

AA Screening matrix

Site name Qualifying interests	Possibility of significant effects (alone) in view of the conservation objectives of the site*	
	Impacts	Effects
Site 1: Malahide Estuary SPA (004025) <u>QI list</u> Great Crested Grebe; Light-bellied Brent Goose; Shelduck; Pintail; Goldeneye; Red-breasted Merganser; Oystercatcher; Golden Plover; Grey Plover; Knot; Dunlin; Black-tailed Godwit; Bar-tailed Godwit;	Direct: None Indirect: Negative impacts (temporary) on surface/ground water quality due to construction related emissions including increased sedimentation and construction related pollution. Negative impacts (long-term) on surface / ground water quality due to operational run-off.	Significant effects on habitat and species as a result of water quality impacts are not likely having regard to the standard construction and operational practice measures that would be implemented regardless of proximity to a European Site, as well as the significant distance, dispersal and dilution factors

Redshank; Wetland and Waterbirds.	Negative impacts on water quality at operational stage due to wastewater discharge.	between the application site and the SPA.
	Likelihood of significant effects from proposed development (alone): No	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects? No	
	Impacts	Effects
Site 2: Malahide Estuary SAC (000205) <u>QI list</u> Mudflats and sandflats not covered by seawater at low tide; Salicornia and other annuals colonising mud and sand; Atlantic salt meadows; Mediterranean salt meadows; Shifting dunes along the shoreline with Ammophila arenaria (white dunes); Fixed coastal dunes with herbaceous vegetation (grey dunes).	Direct: None Indirect: Negative impacts (temporary) on surface/ground water quality due to construction related emissions including increased sedimentation and construction related pollution. Negative impacts (long-term) on surface / ground water quality due to operational run-off. Negative impacts on water quality at operational stage due to wastewater discharge.	Significant effects on habitat and species as a result of water quality impacts are not likely having regard to the standard construction and operational practice measures that would be implemented regardless of proximity to a European Site, as well as the significant distance, dispersal and dilution factors between the application site and the SAC.
	Likelihood of significant effects from proposed development (alone): No	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects? No.	
Step 4 Conclude if the proposed development could result in likely significant effects on a European site		
I conclude that the proposed development (alone) would not result in likely significant effects on Malahide Estuary SPA or Malahide Estuary SAC. The proposed development would have no likely significant effect in combination with other plans and projects on any European site(s). No further assessment is required for the project. No mitigation measures are required to come to these conclusions.		

Screening Determination

Finding of no likely significant effects

In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on Malahide Estuary SPA or Malahide Estuary SAC in view of the conservation objectives of these sites, which are therefore excluded from further consideration. Appropriate Assessment is not required.

This determination is based on:

- The nature and scale of the proposed works and the standard construction and operational practice measures that would be implemented regardless of proximity to a European Site.
- The limited connectivity between the application site and the nearest European Sites as a result of significant distance, dispersal and dilution factors.

Appendix 3

Water Framework Directive Screening Determination

WFD IMPACT ASSESSMENT STAGE 1: SCREENING			
Step 1: Nature of the Project, the Site and Locality			
An Coimisiún Pleanála ref. no.	322775-25	Townland, address	Hildan House, Lispopple, Swords, Co. Dublin
Description of project		Demolition of building, construction of extension of guesthouse, conversion of lounge area and all associated site works.	
Brief site description, relevant to WFD Screening,		The southern boundary of the site is within c. 10 metres of a tributary of the Broadmeadow River (EPA name Broadmeadow_040). The Broadmeadow River flows to the Broadmeadow transitional estuary (EPA name Boroadmeadow Water) and onwards to Malahide Bay (EPA name Malahide Bay). The site is underlain by the Swords Groundwater body.	
Proposed surface water details		It is proposed that permeable paving will be installed and that surface water would be directed via a series of gullies to an on-site soakaway.	
Proposed water supply source & available capacity		It is proposed to connect to the existing watermain along the adjoining R125 regional road. Due to the limited scale of the development, it is not considered that there would be significant impacts on existing capacity.	
Proposed wastewater treatment system & available capacity, other issues		It is proposed to utilise the recently installed and operational pumping chamber and rising main to connect to the Uisce Eireann foul sewer. Due to the limited scale of the development, it is not considered that there would be significant impacts on existing capacity.	

Others?			The applicant’s Civil Engineering Report includes an initial Flood Risk Assessment. Consistent with its findings, I would conclude that there is no significant flood risk associated with the development. As previously outlined, the watercourse to the south of the site is linked to the Broadmeadow/Malahide Estuary, including designated sites such as Malahide Estuary SAC / SPA / pNHA.			
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	C. 10 metres	Broadmeadow_040 (IE_EA_08B020800)	Moderate	At risk	Hydromorphology , Agriculture	Yes – Surface / ground water run-off from the site.
Transitional	C. 4.75km to east	Broadmeadow Water (IE_EA_060_0100)	Moderate	At risk	Urban Wastewater, Domestic wastewater treatment systems	Surface / ground water run-off from the site via the Broadmeadow River
Coastal	C. 8km to the east	Malahide Bay (IE_EA_060_0000)	Moderate	At risk	Urban Wastewater,	Surface / ground water run-off from the site via the Broadmeadow Riveswords
Groundwater	Underlying	Swords (IE_EA_08B020800)	Good	Not at Risk	None identified	Yes – Via the overlying soil.

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	Broadmeadow_040 (IE_EA_08B020800)	Run-off from the site	Siltation, pH (Concrete), hydrocarbon spillages.	None	No. Having regard to the limited scale of the development and the separation distance between the proposed works and the stream (c. 45 metres), I am satisfied that there would be no significant risk to the watercourse.	Screened out.
2.	Transitional / Coastal	Broadmeadow Water (IE_EA_060_0100)	Run-off from the site via the Broadmeadow River.	Siltation, pH (Concrete), hydrocarbon spillages.	None	No. As above, I am satisfied that there would be no significant risk to the	Screened out.

		Malahide Bay (IE_EA_060_0000)				Broadmeadow River or any downstream waterbodies.	
3.	Ground	Swords (IE_EA_08B020800)	Via the overlying soil.	Siltation, pH (Concrete), hydrocarbon spillages.	None.	No. Having regard to the limited scale of the development, I am satisfied that there would be no significant risk to groundwater.	Screened out.
OPERATIONAL PHASE							
1.	Surface	Broadmeadow_040 (IE_EA_08B020800)	Run-off from the site. Wastewater emissions.	Hydrocarbon spillage / pollution, wastewater pollution.	Surface water management measures to include permeable paving and soakaway. Connection to public wastewater network is now operational.	No. As outlined in section 7.4 of this report, I am satisfied that there will be no significant pollution risks associated with surface / waste water.	Screened out.
2.	Transitional / Coastal	Broadmeadow Water (IE_EA_	Run-off from the site via the Broadmeadow River.	Hydrocarbon spillage / pollution,	Surface water management measures to include	No. As above, there will be no significant pollution risks	Screened out.

		060_010 0) Malahide Bay (IE_EA_ 060_000 0)	Wastewater emissions via the Broadmeadow River.	wastewater pollution.	permeable paving and soakaway. Connection to public wastewater network is now operational.	for the Broadmeadow River or any downstream waterbodies.	
3.	Ground	Swords (IE_EA_ 08B0208 00)	Via the overlying soil.	Hydrocarbon spillage / pollution, wastewater pollution.	Surface water management measures to include permeable paving and soakaway. Connection to public wastewater network is now operational.	No. As above, I am satisfied that surface / waste water will be adequately managed and that there will be no significant pollution risks for groundwater.	Screened out.
DECOMMISSIONING PHASE							
5.	N/A	N/A	N/A	N/A	N/A	N/A	N/A

