



An
Coimisiún
Pleanála

Inspector's Report

ACP-322859-25

Development	Construction of aircraft observation facility with all associated site works.
Location	Airport Viewing Point, Old Airport Road (Collinstown Lane), Dublin Airport
Planning Authority	Fingal County Council
Planning Authority Reg. Ref.	F24A/0512E
Applicant(s)	DAA PLC
Type of Application	Permission
Planning Authority Decision	Grant
Type of Appeal	Third Party
Appellant(s)	SMTW Environmental DAC
Observer(s)	None
Date of Site Inspection	04 th September 2025

Inspector

Colin McBride

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Appendix 1 – Form 1: EIA Pre-Screening

Form 3: EIA Screening

Appendix 2 – Form 1: AA Screening

Appendix 3 – Water Framework Directive

1.0 Site Location and Description

- 1.1. The appeal site, which has a stated area of 0.3 hectares, is located on the southern side of the Old Airport Road (Collinstown Lane) and south of Dublin Airport. The appeal site consists of an area running along the southern side of the public road and includes an existing layby off the public road with an embankment running along its southern side. The western portion of the site (west of the layby) features a deeper embankment that is located along the southern edge of the public road and features a flat area on top. To south of the site is a ditch and south of it is a line of trees and hedgerow. The site has historically been used to observe aircraft landing and taking off from the south runway of Dublin airport and is defined by existing scrub and compacted areas of soil due to frequency of use. Adjoining lands include the public road to the north. The lands to the south include agricultural lands bounding the eastern half of the site and Na Fiannas Collinstown pitches adjoining the western half of the site.

2.0 Proposed Development

- 2.1. Permission is sought for the following:
- (a). An elevated viewing platform with sheltered viewing structure, seating and tables;
 - (b). Improved parking facilities with 22 no. car parking spaces, of which 2 will be provided for Persons with Reduced Mobility (PRM) and 2 dedicated family parking spaces;
 - (c). 5 no. bicycle stands (providing 10 no. bicycle parking spaces).
 - (d). A diverge lane for safe vehicle access from Old Airport Road.
 - (e). An electrical enclosure with solar PV Panels.
 - (f). Surface water drainage works incorporating attenuation.
 - (g). lighting, signage and all other associate site development works, including hard and soft landscaping.

- 2.2 The proposal entails the provision of a formal parking and traffic layout on the existing layby on the south side of the Old Airport Road (Collinstown Lane) with provision of an access only entrance on the eastern side and exit only egress on its western side, a 3550mm raised kerb and a landscaped splitter island along the northern edge of the layby/southern edge of the road and the provision of 22 parking spaces formally delineated. A footpath is provided along the southern edge of the layby and bicycle parking at the western side. The flat area on the embankment to the west of the layby is to be increased in size to provide an enlarged area finished in textured permeable paving with retaining gabion walls, steel railings and access provided in the form of an accessible ramp and steps. It is proposed to provide seating and a shelter constructed of metal and timber. It is proposed to provide metal security fencing along the southern side of the site as well retention of existing trees and hedgerow along the southern boundary of the site (outside site boundary). Bollards are provided along the southern side of the viewing platform area to prevent parking outside the designated parking bays and provision is made for possible 3m wide cycle paths along the public road in the future.
- 2.3 In response to further information some amendments were made. The amendments include the provision of yellow box markings at both the vehicle entry and exit points to deter informal stopping and maintain clear access and egress. Provision of a planted island median with bollards at 2m centres in between the individual carriageway of the public road to prevent right turn movements into the proposed development. It was also proposed to relocate the bicycle parking from the eastern side of the layby to the western side adjoining the entry to the ramp access to the elevated platform. The approved layout is as per the amended layout submitted in response to further information.

3.0 Planning Authority Decision

3.1. Decision

Permission was granted subject to 8 conditions. Of note are the following conditions.

2. Details of all materials and external finishes to be agreed, no advertising/signage with further grant of permission, no music or amplified sound and vehicular parking shall not exceed 22 spaces without a further grant of permission.

3. Public lighting scheme to be agreed in writing, no additional artificial lighting.

4. Existing trees and hedgerow to be protected and a tree and hedgerow protection bond to be lodged.

5. Details of the proposed line markings, signage and proposed Island Median with Bollards to be agreed in writing.

8. A Resource Waste Management Plan (RWMP) in accordance with EPA Best Practice Guidelines to be submitted and agreed in writing.

3.2. Planning Authority Reports

3.2.1. Planning Reports

Planning Report (24/07/24):

- Further information required including identify location of site compounds, details of materials and finishes, clarification of parking and pedestrian layout, clarify overlap with application F08A/1068, consideration of WC provision, applicant to engage with Irish Water, address concerns regarding lack traffic access for traffic coming from the west, submission of a traffic survey, possibility of provision of right turning lane, provision of street lighting, submission of a Road Safety Audit, submission of tree survey and Arboricultural Method Statement, a landscape plan, details of type of material to be imported and the applicant is invited to respond to matters raised by third parties.

Planning Report (29/05/25):

- The contents of the further information assessed. It was considered that the proposal would be acceptable in terms of the proper planning and sustainable development of the area subject to a number of conditions. A grant of permission was recommended subject to the conditions outlined above.

3.2.2. Other Technical Reports

Transportation Planning (07/06/24)

- Further information required including issues raised concerning entry only access from the eastern side, submission of a traffic survey, consideration of provision of a right turning lane, provision of bicycle parking, provision of street lighting, provision of a Stage 1 Road Safety Audit and consideration of the car parking quantities proposed.

Parks and Green Infrastructure Division (?)

- Further information requiring including tree survey and Arboricultural Method Statement, submission of a landscaping scheme.

Environmental Department (18/07/24)

- Further information required including details regarding importation of material and whether there are any contamination issues.

Public Lighting Section (27/07/24)

- Further information regarding lighting required.

Transportation Dept (06/03/25)

- No objection subject to conditions.

Parks and Green Infrastructure Division (16/05/25)

- The further information response including arborist report and landscape plans were considered acceptable. A Grant of permission was recommended subject to conditions.

Transportation Planning (15/05/25)

- The response to further information was considered acceptable and a grant of permission was recommended subject to conditions.

Water Services (26/05/25)

- No objection subject to conditions.

Environment, Climate Action, Active Travel and Sports (07/05/25)

- Condition required with an updated Construction and Demolition Resource Waste Management Plan to be agreed prior to the commencement of development.

3.3. Prescribed Bodies

Department of Housing Local Government and Heritage:

The development has the potential to disturb the roosting habitat of a population of bat species listed under Annex IV of the EU Habitats Directive (Council Directive 92/43/EEC).

Has the potential to disturb badger sett due to the scrub habitat in the proposed development.

The removal of mature hedgerow would potentially disturb places of nesting birds.

The Department recommends conditions attached to any grant of permission including a bat survey to be carried out and a Derogation License applied for in the event of bat roost being identified. No felling of mature trees within the period 1 March to 31 August. A badger survey undertaken before any works take place.

3.4. Third Party Observations

Three submission and a further submission in response to further information received including submissions welcoming improved access and parking proposals, a submission highlighting that the applicant has others lands zoned to facilitate such, is contrary Development Plan policy and the Dublin Airport LAP, no account taken of PFAS contamination, impact on water quality of Mayne River, lack of public transport access, lack of cycle parking, inadequate number of parking spaces and concern regarding orientation of such, negative traffic impact due to design and layout, lack of provision of WC facilities, the viewing platform should be elevated higher and air monitoring devices should be located at such.

4.0 Planning History

No planning history on site.

Adjoining sites/in the vicinity:

PL06F.217429 (F04A/1755): Permission granted for new runway including associated taxiways, internal road network, substations, navigational equipment, site works. Demolish derelict house. Demolish existing runway 11-29, relocate engine testing area. Granted May 2007.

F23A/0781: Permission sought to increase passenger capacity of the airport from that imposed under condition of PL06F.220670 and PLF06.223469. Pending decision.

ABP-317831-23: Permission sought for the development of a three 110kV electricity circuits. This site runs on and east west access to the south of the appeal site. Pending decision.

NA29N.314724: Railway Order Application for Metrolink, Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont. Runs to the east of the site. Pending decision.

5.0 Policy Context

5.1. Development Plan

The relevant Development Plan is the Fingal Development Plan 2023-3029

A portion of the site is zoned 'GE' General Employment with a stated objective 'to provide opportunities for general enterprise and employment'.

The vision for GE zoning is to 'facilitate opportunities for compatible industry and general employment uses including appropriate sustainable employment and enterprise uses, logistics and warehousing activity in a good quality physical environment. General Employment areas should be highly accessible, well design, permeable and legible'.

The remainder of the site no within the GE zoning is subject to no formal zoning but is defined as 'Road', the land adjacent to the site to the north is zoned 'DA' Dublin Airport with a stated objective to 'ensure the efficient and effective operation and development of the airport in accordance with an approved Local Area Plan'.

The subject site is located with the DA Noise Zone A (≥ 63 LAeq, 16hr and/or ≥ 55 dB Night). 'To resit new provision for residential development and other noise sensitive uses. All noise sensitive developments within this zone may potentially be exposed to high levels of aircraft noise, which may be harmful to health or otherwise unacceptable. The provision of new noise sensitive development will be resisted'.

The subject site is located within the Outer Public Safety Zone (permitted for Retail/Leisure Facilities Less than 85 Persons per half hectares as listed in Annex B of the ERM-Public Safety Zones Report).

5.2. Natural Heritage Designations

7km from Baldoyle Bay SAC (000199) and 7.2km from Baldoyle Bay SPA (004016).

6.0 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 Road 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 this report.

The only possible classes the development could fall into are under Schedule 5, Part 2

10. Infrastructure projects

(b)

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

(iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.

(d) All airfields not included in Part 1 of this Schedule with paved runways which would exceed 880 metres in length.

In this case the car park is incidental to the development, and the development is not an airfield or within such. The class the development may fall is Part V, Schedule 2, 10 (iv). In this case the site is 0.2864. In the case of sub-threshold likely to have significant effects all relevant information is required under Schedule 7A.

In this case the applicant has submitted Schedule 7 information contained within a report entitled Environmental Impact Assessment Screening Report.

Concern is expressed in the grounds of appeal that the proposed development would have a significant environmental effect cumulatively with other plans and projects in relation to PFAS/PFOS contamination. Impacts in regard to such are addressed in section 8.3 of the planning assessment. Further, in Appendix 1 of this report the proposed development has been screened for environmental impact assessment. Having regard to the characteristics and location of the proposed development and types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. It is concluded that, therefore, that the issues raised in respect of PFAS/PFOS contamination can be addressed within the report and there is, otherwise, no real likelihood of significant effects on the environment. The proposed development, therefore, does not trigger a requirement for environmental impact assessment and an EIAR is not required.

7.0 The Appeal

7.1. Grounds of Appeal

A third-party appeal has been lodged by SMTW Environmental DAC. The grounds of appeal are as follows.

- The appellants outline that they are in favour of improved works at the Observation mound however have concerns about a number of aspects of the proposal.
- The appellants primary concern is in relation to PFAS/PFOS contamination at the site and the lack of screening and assessment of potential risks to public health and the environment. The appellants are disappointed with the assessment of such and highlight that the site is in close proximity to known PFAS/PFOS discoveries as part of the Metrolink preliminary investigations.

- The appellants' highlight the that the Mayne River runs adjacent to the mound and is hydrologically linked to Baldoyle Bay SPA and SAC. The applicant highlights the existing application under F23A/0781 concerning the airport and the issue of PFAS/PFOS contamination in the context of in-combination effects on European sites and note that the Planning Authority is not in a position to determine there would be no effects on European sites.
- The Planning Authority's response to this issue is inadequate with the attachment of a condition requiring the submission and agreement of an updated Construction and Demolition Resources Waste Management Plan (RWMP) inadequate to deal with this issue. The applicant did not carry out adequate assessment of this issue including appropriate trial pit investigations.
- The appellants consider that a proper screening of PFAS/PFOs is required and could be subject to further information.

7.2. Applicant's Response

Response by the applicants, the DAA.

- The applicants clarify that they have conducted a dedicated site investigation for such contamination within the project area and have included the key findings from the PFAS/PFOS Site Investigation Report (Fehily Timoney, May 2025).
- The applicant claim that based on the investigations, which follow best practice methods the proposal will cause no risk to public health, groundwater or nearby Natura 2000 sites. The Planning Authority attached a condition requiring a Construction and Demolition Resource Waste Management Plan and the applicant highlights that the site is not within the footprint of the North Runway or Apron 5H developments where PFAS/PFOS was previously identified.
- The applicants note that the proposed development has been subject to robust environmental and planning scrutiny with EIA and AA screening both carried out. Both have had regard to the possibility of cumulative effects with other projects with no significant cumulative effects anticipated.

7.3. **Planning Authority Response**

Response by Fingal County Council

- The Planning Authority request that the Coimisiún uphold the decision to grant permission. In the event of a grant of permission it requested that a number of conditions are attached.

7.4. **Observations**

None.

8.0 **Assessment**

8.1. Having 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 having inspected the site, and having regard to the relevant local/regional/national policies and guidance, I consider that the substantive issues in this appeal to be considered as follows:

- Principle of the proposed development
- PFAS/PFOS Contamination
- Ecological Impact
- Other Issues

8.2. Principle of the proposed development:

8.2.1 The proposal is for an elevated viewing platform with sheltered viewing structure, seating and tables, improved parking facilities with 22 no. car parking spaces, diverge lane and associated site works. The existing site is currently being used for the purposes of observation of aircraft landing and taking off from the south runway

of Dublin Airport with the existing layby used for parking and the embankment on site used to observe the aircraft. This is a long-established activity at this location.

8.2.2 As noted under the Planning Policy section the site is partially zoned 'GE' General Employment with the remainder (the layby area is not zoned and is extension of the public road) having no defined zoning under the Fingal County Development Plan 2023-2029.

8.2.3 The appeal site is limited development potential given it's a narrow site on the edge along the southern edge of the public road and is likely have no real development potential for any other use. The proposal is essentially the provision of improved facilities and more formal design to facilitate what is a long-established use of this location for the observation of aircraft.

8.2.4 It is notable that one of the submissions to the application highlighted that such facilities should be provided within the confines of the airport grounds. I would be of the view that given the existing location and nature of the site that it would be unlikely that such use would cease at this location even in the event of alternative facilities being provided elsewhere. In this regard I would consider that proposal to provide an improvement in the facilities provided and a more formalised parking and access arrangement to be positive element, I would also consider that proposal would be acceptable in the context of the zoning the site. I would consider that the principle of the proposed development is acceptable at this location.

8.3. PFAS/PFOS Contamination:

8.3.1 The appellants' primary concern is in relation to PFAS/PFOS contamination at the site and the lack of screening and assessment of potential risks to public health and the environment. The appellants are disappointed with the assessment of such and highlight that the site is in close proximity to known PFAS/PFOS discoveries as part of the Metrolink preliminary investigations. PFAS/PFOs are per- and polyfluoroalkyl substances, which are long lasting synthetic chemicals that can pass into the soil,

water and air during production and use. The main source of such contamination in terms of Dublin Airport relates to historical use of firefighting foam that contained PFAS (in use before 2013).

- 8.3.2 The applicant response highlights that site investigation in relation to PFAS/PFOS has been carried out on site and refer to the submitted Site Investigation Report carried out by Fehily Timoney dated May 2025. The site investigations include two Above the Original Ground Level (AOGL) samples and one Below the Original Ground Level sample where excavations below ground level are required. In case of each sample (AGOL1, AGOL2 and BGOL1) 5 sub samples were taken and such are illustrated in the submitted report. The results of analysis of the soils taken from the are that no detectable concentration of PFAS contamination on site.
- 8.3.3 The appellant's argument that that level of site investigation carried out is insufficient with trial holes of insufficient depth and a lack of consideration of cumulative effects with other projects and plans in this regard. The appellant also highlights that the condition attached to the grant of permission requiring a Construction and Demolition Resource Waste Management Plan (RWMP) is insufficient to deal with this issue.
- 8.3.4 The proposal relates to an existing area that is currently actively used for the purposes of aircraft movement observations from a public location. The existing site consists of a layby used for parking and an elevated area on an embankment used to observe the aircraft. The proposal seeks to formalise the parking with markings and provide for a new traffic layout including entry access only entrances, pedestrian facilities and cycle parking. The works to the embankment include an enlarging the available for viewing and providing a surfaced area, shelter, ramped and step access retaining walls and railings. The crux of the argument in terms of contamination is that the level of site investigation carried out is not sufficient in terms of PFAS/PFOS contamination with the trial pits considered to be of insufficient depth and the provision a condition requiring a Construction and Demolition Resource Waste Management Plan (RWMP) to be agreed insufficient. The applicant has indicated that a dedicated site investigations have taken place on site, and such been carried

out in accordance with best practice measures with no discernible traces of PFAS contamination detected on site. The applicant has also highlighted the fact that the site is not located within the footprint of the North Runway or Apron 5H developments where PFAS/PFOS was previously identified.

8.3.5 In the case of the proposed development the application site is located in proximity to Dublin Airport, however, is not within the overall lands that make up airport operations and is a site is outside the boundary of the airport and on other side of the Old Airport Road (Collinstown Lane). The DAA commissioned Fehilly Timoney Consultants to conduct surface water monitoring, groundwater monitoring and site investigations, and prepare an environmental monitoring report for the Dublin Airport site. This report has been produced to interpret and report on an environmental monitoring programme conducted within the curtilage of the airport and its environs for per- and poly-fluoroalkylated substances (herein referred to as PFAS). The final report entitled 'Dublin Airport 2021-2023 Environmental Monitoring Report'¹ outlines the extent of contamination in relation to Dublin Airport. In addition, I would refer to the TII reply to An Bord Pleanála Request for a Response to Wild Ireland Defence CLG & Sabrina Joyce-Kemper Submission². These documents outline the level of PFAS contamination found in soils, groundwater and surface water at Dublin Airport and its environs. The nature of the contamination as outlined earlier is firefighting foam used prior to 2013 within the Dublin Airport Campus. This contamination occurred in certain areas of the airport, however excavation and relocation of material within the airport for various projects would have spread such contamination. The documents referred to above provide details of the extent of the contamination associated with Dublin Airport. There is no evidence that there is soil contamination evident outside the confines of the airport premises and such is highly unlikely considering that the original source of such contamination is an activity that was carried out within the confines of the airport campus. In this case the application site is outside of the Airport Campus and is on the opposite side of public road to such.

¹ [2021-2023-Environmental-Monitoring-Report.pdf](#)

² [Microsoft Word - FINAL Draft Railway Order - MetroLink.docx](#)

8.3.6 In regard to contamination the applicant has carried out site investigations for the application site and has provided the details of these results, which indicate no discernible traces of PFAS contamination on site. I would consider having regard to the nature and scale of the development, which is modest in terms of overall scale that the level of site investigation indicates that there is no contamination on site and the excavation of material on site is unlikely to result in the disturbance or transportation of contaminated material. Having regard to the nature of the contamination and its source, which is associated with operations exclusively carried out within the confines of the airport that there is unlikely to be any contaminated soil on site and the excavations on site are unlikely to release any further contamination. I am satisfied that the applicants site investigations back this view up. I would consider an appropriate condition requiring submission and agreement of a Construction and Demolition Resource Waste Management Plan (RWMP) is required as was imposed by the Planning Authority in granting permission and is sufficient in this regard.

8.3.7 In regard to cumulative impact with other plans and projects, I am satisfied that the proposed development is of modest in scale and a stand-alone project to the other projects and plans identified in the intervening area including applications in relation to Dublin Airport (site is located outside the confines of the airport operations), Metrolink and any other development sought or permitted in vicinity. In this regard I am satisfied that the application alone would have no significant environmental effects and do not consider that such in conjunction with any of the other plans and projects in the area would result in cumulative environmental effects. I would refer to the section on Environmental Impact Assessment Screening above and Appendix 1 of this report in which screening for EIA has been carried. I would also refer to the section regarding Appropriate Assessment and Appendix 2 of this report in which AA screening is carried out.

8.3.8 I am satisfied that subject to appropriate conditions, the proposed development would have no adverse environmental effects.

8.4 Ecological Impact:

8.4.1 The submission from the Department of Housing, Local Government and Heritage raises a number of issues. These include the potential to disturb roosting habitat of bat species, nesting birds due to removal of trees and hedgerow and impact on badgers due to removal of scrub habitat. The submission does recommend that conditions be attached to any grant of permission requiring a bat survey to be carried out and a derogation license sought if any potential bat roosts are identified, subject to any requirement for a felling license any removal of mature trees should not occur with the period 1 March to 31 August, a badger survey carried out before works take place.

8.4.2 The appeal site is characterised by an existing embankment running along the southern boundary of the site with an existing tarmacked layby and an embankment with greater depth on the western side of the site. Adjoining the southern boundary of the site to rear of the embankment is a hedgerow/treeline, which is not on the appeal site. The applicant submitted a Tree Survey and Planning Report in response to further information. The trees survey identifies that the works will not impact the existing trees and hedgerow running along the southern boundary of the site and that the only existing trees on site are 2 elder bushes and the works will require removal of all undergrowth and bushes covering the existing earthen mound. The works will not extend into the main body of the hedgerow but is likely to encroach into the nominal root protection areas (RPAs) of some of the hedgerow trees (T1-T11) to the north of hedge. The extent of the rooting to the north of the hedge is difficult to quantify because of the presence of the ditch between the treeline and the land to the north. It is noted that it probable there is some root-spread to the north of the ditch into the site that may be impacted by the proposed earthworks. It is stated that the impact on the root spread of hedgerow trees will be best mitigated by a combination of monitoring of tree condition, coppicing, hedge-laying and new infill planting of hedgerow species. There is potential for unintended damage to trees and hedgerows unless the site is well managed during pre-construction and construction.

Tree protection recommendations are provided in the Abotricultural Method Statement.

8.4.3 The Method Statement indicates that any branches extending over site making up the hedgerow H1 will be pruned back. It is noted that where agreement can be reached with owners of H1, tree T8 should be coppiced. Tree protection measures to be implemented during construction include tree protection fencing parallel to the hedge.

8.4.4 In relation to the submission by the Department of Housing, Local Government and Heritage, I would highlight that the proposal does not entail removal of any trees or hedgerow that make up the existing treeline/hedgerow along the southern boundary of the site identified as H1 in the submitted Tree Survey and Planning report. In addition, I would note that measures are being proposed during the construction phase to ensure the protection of this existing hedgerow/treeline during construction. In this regard I am satisfied that the proposal would not result in the loss of any trees with roosting potential for bats or nesting birds. The proposal does entail clearing undergrowth and bushes covering the existing earthen mound; however, I would highlight the fact that the existing site in current condition is subject to a long-established use for the purposes of parking and observation of aircraft. In this regard there is a significant level of human activity at this site and there no evidence to suggest that the site is of significant ecological value or is an existing habitat of conservation value.

8.4.5 The Department's submission does not recommend preclusion of the proposal and recommended a condition be attached. As noted earlier the proposal entail no loss of existing trees or the hedgerow that could be used for the purposes of roosting or commuting bat species or as a nesting habitat for birds with measures to be implemented during construction to protect the adjoining hedgerow/treeline from damage. I am satisfied that the provision of a condition as per the Department's submission is unlikely to be necessary in particular in light of the fact that the hedgerow/treeline adjacent the southern boundary of the site is not being removed

and is not within the site and measures are proposed to protect the root network of such that may encroach into the site. I would recommend that the part of the recommended condition in relation to badgers be applied despite there being no evidence of such on site as a precautionary measure.

8.5 Other Issues:

8.5.1 The grounds of appeal are primarily concerned with PFAS/PFOS contamination and cumulative assessment with other plans and projects in term Environmental Impact Assessment as wells Appropriate Assessment issues. The submissions during the application also raised concerns regarding the level of facilities provided in terms of parking and sanitary facilities and the issue of traffic was a significant consideration during at the application stage.

8.5.2 The provision is for 22 formally designated parking spaces. In terms of the question whether such is sufficient, I would note that this is likely to be the maximum level that can be provided as there are constraints that exist such as the existing layby is a defined size and increasing parking would necessitate increasing the layby size and cutting into the existing embankment. I would consider based on the fact that site is subject to ongoing use for aircraft observation and such is likely to continue regardless of the development, the provision of defined parking including the provision of spaces for mobility impaired persons and an access ramp for mobility impaired persons is an improvement over the existing arrangement and should be encouraged. In relation to sanitary facilities, the existing site does not have such facilities, and I am satisfied that there is no statutory requirement for such in terms of the established and proposed use and that the provision of such would require ongoing maintenance.

8.5.3 In terms of traffic the existing layby is open along its entire length with the proposal seeking to provide a diverge lane with a physical barrier along northern edge of the layby with access only to east of the layby and egress only at the western side of the layby. This provides a more orderly approach to access and egress than is currently

available. The applicant was requested to explore the possibility of providing a right turn lane on the public road to facilitate access for traffic travelling from the west however it is clear that insufficient space is available to facilitate such. The applicant did amend the proposal in response to further information to provide a planted island median with bollards at 2m centres in between the individual carriageway of the public road to prevent right turn movements into the proposed development. Such would have the effect of preventing right turn movement for traffic travelling from the west with access only available for the traffic travelling towards the site from an easterly direction. Based on the approved design, traffic exiting the site would still be able to travel in either direction when leaving the site.

8.5.4 I am of the view that the proposal provides for a more ordered and defined traffic layout on site and in this regard is an improvement of the existing traffic layout and as noted earlier, I am of the view that the site is likely to continue in use for observation of aircraft regardless of whether this proposal is permitted or not. In this regard I would consider that the provision of improved amenities and traffic layout is a positive element and should be permitted. I would highlight that the proposal was accompanied by a Traffic Statement and a Stage 1 Roads Safety Audit, with the Council's Transportation Section raising no objection to the proposal subject to conditions.

8.5.5 The proposal entails provision of new structural elements including an enlarged and surfaced viewing area, ramped and step access, railings and shelter and seating. I would be of the view that these elements do not represent structural elements of significant scale or visual bulk at this location. The existing site has a backdrop of trees and hedgerow that will not be removed and protected during construction works. I am satisfied that the proposal would be satisfactory in the context of overall visual amenity.

8.6 Conclusion:

8.6.1 I am satisfied that subject to appropriate conditions the proposed development will be satisfactory in the context of land use zoning, principle of proposed development, visual and adjoining amenities, traffic safety and in terms of environmental impact. In this regard I am satisfied that the proposed development would, therefore, be acceptable in the context of the proper planning and sustainable development of the area.

9.0 AA Screening

I have considered the proposal for an elevated viewing platform with sheltered viewing structure, seating and tables, improved parking facilities with 22 no. car parking spaces, diverge lane and associated site works in light of the requirements S177U of the Planning and Development Act 2000 as amended.

The subject site is located in a semi-rural area and 7km and 7.2km from the nearest Natura 2000 sites, which are the Baldoyle Bay SAC (000199) and the Baldoyle Bay SPA (004016) respectively.

The proposed development comprises the construction of an aircraft observation facility with all associated site works. No nature conservation concerns were raised in the planning appeal.

Having considered the nature, scale and location of the project, I am satisfied that it can be eliminated from further assessment because it could not have any effect on a European Site.

The reason for this conclusion is as follows:

- Nature of works are small scale in nature.
- Location-distance from nearest European site and lack of direct connections.
- **Standard construction and operational practices implemented with no reliance on** specific mitigation measures to protect European sites.

I conclude, on the basis of objective information, that the proposed development would not have a likely significant effect on any European Site either alone or in

combination with other plans or projects.

Likely significant effects are excluded and therefore Appropriate Assessment (under Section 177V of the Planning and Development Act 2000) is not required.

10.0 Water Framework Directive Screening

- 10.1. The subject site is located adjacent a drainage ditch which runs along the southern boundary of the site; the drainage ditch is culverted for part of the portion that runs along the south boundary. This drainage channel discharges to the River Mayne, which is 500m to south of the site (Mayne_010, EPA Ref. Code IE_EA_09M030500). Surface water drainage from the site discharges to the drainage ditch and subsequently to the River Mayne and then to Baldoyle Bay.
- 10.2. I have assessed the proposal 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 and 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, I am satisfied that it can be eliminated from further assessment (refer to Appendix 3) because there is no conceivable risk to any surface and/or groundwater water bodies either qualitatively or quantitatively
- 10.3. Conclusion - I conclude that 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 and consequently can be excluded from further assessment.

Refer to Water Framework Directive Table in Appendix 3 of this report.

11.0 Recommendation

- 11.1. I recommend a **grant** of permission for the construction of an aircraft observation area and associated site works.

12.0 Reasons and Considerations

- 12.1 Having regard to the location of the subject site, the nature and scale of development proposed and the fact that the site is in active use for the purpose of observing aircraft movements, the Commission was satisfied that the proposed development is an acceptable form and type of development at this location. The Commission was also satisfied that subject to the conditions hereby attached, the proposed development would not give rise to a traffic hazard. The Commission was satisfied that the proposal would be satisfactory in terms of public health. The proposed development was, therefore, considered to be in accordance with the proper planning and sustainable development of the area

13.0 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 further plans and particulars received by the planning authority on the 06th day of May 2025, except as may otherwise be required in order to comply with the following conditions. Where such of 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 and the development shall be carried out and completed in accordance with the agreed particulars.

Reason: In the interest of clarity.

2 All mitigation measures outlined in the plans and particulars, including the AA Screening and Arboricultural Method Statement, shall be carried out in full, except where otherwise required by conditions attached to this permission.

Reason: In the interest of protecting the environment and in the interest of public health

3 A detailed construction traffic management plan shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. The plan shall include details of arrangements for routes for construction traffic, parking during the construction phase, the location of the compound for storage of plant and machinery and the location for storage of deliveries to the site.

Reason: In the interest of sustainable transport and safety.

4. Site development and building works shall be carried out only between the hours of 0700 to 1900 Mondays to Friday inclusive, between 0800 to 1400 hours on Saturdays and not at all on Sundays and public holidays. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from the planning authority.

Reason: In order to safeguard the residential amenities of property in the vicinity.

5. The landscaping scheme submitted with the planning application, as amended at further information stage shall be carried out in full. All planting shall be adequately protected from damage until established. Any plants which die, are removed or become seriously damaged or diseased, within a period of five years from the completion of the development or until the development is taken in charge by the local authority, whichever is the sooner, shall be replaced within the next planting season with others of similar size and species, unless otherwise agreed in writing with the planning authority.

Reason: In the interest of visual amenity.

6. The following requirements shall be complied with in full;

a) The details and layout of all proposed line markings and signage on the public road including the proposed 'Island Median with Bollards', shall be agreed in writing with the Council prior to the commencement of development.

b) No objects, structure, landscaping shall be placed or installed within the visibility splays at the vehicular entrances and exit (as defined by DMURS/TII DN GEO-03060 (Current Edition) and as per the submitted Site Plan) exceeding a height of 900mm; which would interfere or obstruct (or could obstruct over time) the required visibility plays.

c) The applicant shall be responsible for the maintenance, repair and upkeep of the Development,

d) All underground or overhead and serves and poles shall be relocated, as may be necessary, to a suitable location at the Developer's own expense and according to the requirements of the relevant utility service provider/service owner/statutory undertaker and be agreed in writing with the Planning Authority prior to the undertaking of any works in this regard.

Reason: To define the terms of the permission and to cater for orderly development of the area, safe access and egress from the development and the proper planning and sustainable development of the area.

7. The following requirements shall be complied with in full;

a) Prior to the commencement of development, 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) shall be prepared and submitted to the planning authority for written agreement. The RWMP shall include specific proposals as to how the RWMP will be measured and monitored for effectiveness. All records (including for waste and all resources) pursuant to the agreed RWMP shall be made available for inspection at the site office at all times.

Reason: In the interest of public health, public and residential amenity and the proper planning and sustainable development of the area.

8. Prior to commencement of works, the developer shall submit to, and agree in writing with the planning authority, a Construction 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 and off-site disposal of construction/demolition waste.

Reason: In the interest of public safety and amenity.

9. A badger survey is to be undertaken before any works take place and the findings submitted and agreed in writing with the Planning Authority. If any active badger setts are located, the TII Guidelines for the treatment of badger sett prior to the construction of road schemes is adhered to.

Reason: In the interest of biodiversity protection.

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.

Colin McBride
Senior Planning Inspector

26th September 2025

Appendix 1
Form 1 - EIA Pre-Screening
No EIAR Submitted

Case Reference	
Proposed Development Summary	Construction of aircraft observation facility with associated site works.
Development Address	Old Airport Road (Collinstown Lane)
	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.	State the Class here
☒ 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.	
--	--

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 ☒	Screening Determination required (Complete Form 3) Schedule 7A information has been received and development is sub-threshold with the grounds of appeal identifying potential for significant environmental effects.

Inspector: _____

Date: _____

Form 3 - EIA Screening Determination Sample Form

A. CASE DETAILS		
An Bord Pleanála Case Reference	ABP-322859-25	
Development Summary	Construction of aircraft observation facility with associated site works.	
	Yes / No / N/A	Comment (if relevant)
1. Was a Screening Determination carried out by the PA?	Y	PA report states: The PA are satisfied that the proposed development is not listed in Schedule 5 Part 1 or Part 2 of the Planning and Development Regulations as amended. Whilst not meeting or exceed the thresholds of development listed in Schedule 5 Part 2, or qualifying as subthreshold development, the proposal has been screened considered the criteria to establish the weight/'significance' of effects of sub-threshold developments in Departmental guidance. The PA has determined that no significant effects are likely, no Environmental Impact Assessment (EIA) is required.
2. Has Schedule 7A information been submitted?	Y	Report entitled: Environmental Impact Assessment Screening report
3. Has an AA screening report or NIS been submitted?	Y	AA screening report.
4. Is an IED/ IPC or Waste Licence (or review of licence) required from the EPA? If YES has the EPA commented on the need for an EIAR?	N	None.

5. Have any other relevant assessments of the effects on the environment which have a significant bearing on the project been carried out pursuant to other relevant Directives – for example SEA	Y	SEA was undertaken by the Planning Authority in respect of the Fingal Development Plan 2023-2029.	
B. EXAMINATION	Yes/ No/ Uncertain	Briefly describe the nature and extent and Mitigation Measures (where relevant) (having regard to the probability, magnitude (including population size affected), complexity, duration, frequency, intensity, and reversibility of impact) Mitigation measures –Where relevant specify features or measures proposed by the applicant to avoid or prevent a significant effect.	Is this likely to result in significant effects on the environment? Yes/ No/ Uncertain
This screening examination should be read with, and in light of, the rest of the Inspector's Report attached herewith			
1. Characteristics of proposed development (including demolition, construction, operation, or decommissioning)			
1.1 Is the project significantly different in character or scale to the existing surrounding or environment?	N	The development comprises an aircraft observation facility. The nature and scale of the proposed development is modest in scale and provides upgrade of a site that is currently in active use for observing aircraft.	No
1.2 Will construction, operation, decommissioning or demolition works cause physical changes to the locality (topography, land use, waterbodies)?	Y	The proposed development will provide additional structural elements of a site that is partially a greenfield site. The proposed development is not considered to be out of	No

		character with the existing and emerging pattern of development in the wider area.	
1.3 Will construction or operation of the project use natural resources such as land, soil, water, materials/minerals or energy, especially resources which are non-renewable or in short supply?	Y	Construction materials will be typical of an urban environment. The loss of natural resources or local biodiversity as a result of the development are not regarded as significant.	No
1.4 Will the project involve the use, storage, transport, handling or production of substance which would be harmful to human health or the environment?	Y	Construction activities will require the use of potentially harmful materials, such as fuel and other substances. Such use will be typical of construction sites. Any impact would be local and temporary in nature and implementation of a Construction and Environmental Management Plan will satisfactorily mitigate potential impacts. No operational impacts in this regard are anticipated.	No
1.5 Will the project produce solid waste, release pollutants or any hazardous / toxic / noxious substances?	Y	Construction activities will require the use of potentially harmful materials, such as fuels and other substances and will give rise to waste for disposal. Such use will be typical of construction sites. Noise and dust emissions during construction are likely. Such construction impacts would be local and temporary in nature, and the implementation of a Construction and Environmental Management Plan will satisfactorily mitigate potential impacts. A Site Investigation report was submitted demonstrating that there is no detectable traces of PFAS contamination on site. Significant operational impacts are not anticipated.	No

1.6 Will the project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	N	No significant risk identified. Operation of a Construction and Environmental Management Plan will satisfactorily mitigate emissions from spillages during construction. The operational development will connect existing surface water drainage with implementation of SuDs measures on site including attenuation, permeable paving and hydrocarbon interceptor. No connection to wastewater of water supply is proposed. No significant emissions during operation are anticipated.	No
1.7 Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	Y	Potential for construction activity to give rise to noise and vibration emissions. Such emissions will be localised and short term in nature and their impacts will be suitably mitigated by the operation of a Construction Environmental Management Plan.	No
1.8 Will there be any risks to human health, for example due to water contamination or air pollution?	N	Construction activity is likely to give rise to dust emissions. Such construction impacts would be temporary and localised in nature, and the operation of a Construction Environmental Management Plan would satisfactorily address potential impacts. No significant operational impacts anticipated.	No
1.9 Will there be any risk of major accidents that could affect human health or the environment?	N	No significant risk having regard to the nature and scale of the proposed development. Any risk arising from construction will be localised and temporary in nature. The site is not at risk of flooding (SSFRA submitted with the application). There are no SEVESO/COMAH sites in the vicinity of this location.	No

1.10 Will the project affect the social environment (population, employment)	N	The proposal is for improvement of an existing area used for aircraft observation and does not entail any increase in population. The proposal will provide better accessibility for mobility impaired individuals.	No
1.11 Is the project part of a wider large scale change that could result in cumulative effects on the environment?	N	The site relates to a small area currently in use for observation of aircraft and provides for an improvement in existing facilities and formalisation of traffic and parking arrangements. The proposal is separate to Airport operations and no significant cumulative impacts are anticipated.	No
2. Location of proposed development			
2.1 Is the proposed development located on, in, adjoining or have the potential to impact on any of the following: - European site (SAC/ SPA/ pSAC/ pSPA) - NHA/ pNHA - Designated Nature Reserve - Designated refuge for flora or fauna - Place, site or feature of ecological interest, the preservation/conservation/ protection of which is an objective of a development plan/ LAP/ draft plan or variation of a plan	Y	The site is located 7km and 7.2m from the Baldoye Bay SAC (000199) and Baldoye Bay SPA (004016) respectively. The potential for adverse impact to the SAC and SPA have been addressed in Appendices 1 and 2. The applicant prepared an AA Screening report. Accordingly, I do not consider the project likely to result in a significant effect on the environment in terms of ecological designations or biodiversity.	No
2.2 Could any protected, important or sensitive species of flora or fauna which use areas on or around the site, for example: for breeding,	N	No such species use the site and no impacts on such species are anticipated.	No

nesting, foraging, resting, over-wintering, or migration, be affected by the project?			
2.3 Are there any other features of landscape, historic, archaeological, or cultural importance that could be affected?	N	There are no landscape designations or protected scenic views at the subject site. There are no protected structures within or adjoining the site, and the site is not included within an architectural conservation area. The site contains no Recorded Monuments and the nearest such monument is an earthwork (DU014-136---) located c. 140m and a cropmark enclosure DU014-121----) further south of it and to the southwest of the site. The site contains no Protected Structures as listed in the Fingal Development Plan 2023-2029). Due to the size of the site, there is low potential for the continued survival of archaeological material and features within the site. Further archaeological assessment, and as necessary, preservation by record and/or in-situ, during construction could be considered.	No
2.4 Are there any areas on/around the location which contain important, high quality or scarce resources which could be affected by the project, for example: forestry, agriculture, water/coastal, fisheries, minerals?	N	No	No
2.5 Are there any water resources including surface waters, for example: rivers, lakes/ponds, coastal or groundwaters which could be affected by the project, particularly in terms of their volume and flood risk?		A drainage ditch runs along the southern boundary of the site and such drains to the River Mayne (IE_EA_09M030500), 500m to the south of the site and subsequently to Baldoyle Bay. Hydrological modelling has found the Site to lie outside flood risk zones A	

		and B. Accordingly: (i) the Site is appropriate for development from a fluvial flood-risk assessment; (ii) the Justification Test if not required.	
2.6 Is the location susceptible to subsidence, landslides or erosion?	N	No such risks identified.	No
2.7 Are there any key transport routes(eg National primary Roads) on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	N	The site is served by a local road network. No significant contribution to traffic congestion is anticipated. Improvements are planned to the access and egress to the site and improved parking delineation and pedestrian facilities.	No
2.8 Are there existing sensitive land uses or community facilities (such as hospitals, schools etc) which could be affected by the project?	N	The site is a short distance from Dublin Airport but is of a scale that would not give rise to significant effects on the operation of such.	No
3. Any other factors that should be considered which could lead to environmental impacts			
3.1 Cumulative Effects: Could this project together with existing and/or approved development result in cumulative effects during the construction/ operation phase?	N	No developments have been identified in the vicinity that could give rise to significant cumulative environmental effects.	No
3.2 Transboundary Effects: Is the project likely to lead to transboundary effects?	N	No transboundary considerations arise.	No
3.3 Are there any other relevant considerations?	N	None	No
C. CONCLUSION			
No real likelihood of significant effects on the environment.	x	EIAR Not Required	

Real likelihood of significant effects on the environment.	☐	EIAR Required
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D. MAIN REASONS AND CONSIDERATIONS

Having regard to: -

1. the criteria set out in Schedule 7, in particular

a) The nature and scale of the project, which is below the thresholds in respect of Class 10(b)(iv) of the Planning and Development Regulations 2001, as amended.

b) The location of the site on partially zoned lands for General Employment, and other relevant policies and objectives in the Fingal Development Plan 2023-2029, and the results of the strategic environmental assessment of this plan undertaken in accordance with the SEA Directive (2001/42/EC).

c) The nature of the site and its location.

d) The pattern of existing and permitted development in the area.

e) The planning history within the wider area

Inspector _____

Date _____

Approved (DP/ADP) _____

Date _____

Appendix 2 AA

Screening Determination

Screening for Appropriate Assessment

Screening Determination

I have considered the proposed development in light of the requirements of S177U of the Planning and Development Act 2000 as amended.

1. Description of the project

The site comprises an area of 0.3ha gross, is located on the southern side of the Old Airport Road (Collinstown Lane) and south of Dublin Airport. The appeal site consists of an area running along the southern side of the public road and includes an existing layby off the public road with an embankment running along its southern side. The western portion of the site (west of the layby) features a deeper embankment that is located along the southern edge of the public road and features a flat area on top. To the south of the site is a ditch and south of it is a line of trees and hedgerow. The nearest Natura 2000 sites (Balydolye Bay SAC and Balydoyle Bay SPA) are located c. 7km and 7.2km respectively to the east of the site. The proposal entails provision of an elevated viewing platform with sheltered viewing structure, seating and tables, improved parking facilities with 22 no. car parking spaces, bicycle parking, a diverge lane for vehicle access, and electrical enclosure with solar PV panels, surface water drainage works incorporating attenuation, lighting signage and associated site works including hard and soft landscaping.

The Planning Authority acknowledged the applicant's AA Screening Report and highlights that An Coimisin Pleanála is the competent authority for screening and assessment purposes.

2. Potential Impact mechanisms from the project

Habitats

The site is not within or directly adjoining any Natura 2000 sites. There is a separation distance to the nearest Natura 2000 sites, i.e., at 7km to the Baldoyle Bay SAC. Accordingly, I do not consider that there is potential for any direct impacts such as habitat loss / modification, direct emissions, or species mortality/disturbance. The majority of the site consists of scrub land with remainder of the site a tarmac surfaced layby off the public road. The site is currently actively used for the purposes of parking and observation of aircraft landing and taking off from the south runway of Dublin Airport. There is potential indirect impact on surface water as surface water runoff from the site outfalls to a local field drain which connects to the River Mayne which in turn outfalls c. 8km downstream to the Baldoyle Bay SAC and Baldoyle Bay SPA. Having regard to the nature of the site and its surroundings, together with the fact the site has historically been in active use for the purposes of parking and observation aircraft, I am satisfied that the site is not a significant ex-situ foraging or roosting site for QI species associated with any Natura 2000 sites.

3. European Sites at Risk

Having regard to the potential impact mechanisms from the proposal, the European site (s) and qualifying features potentially at risk are considered in the following table.

Table 1 European Sites at risk from Impacts of the project			
European Site(s)	Effect Mechanism	Impact pathway/Zone of Influence	Qualifying features at risk
Baldoyle Bay SAC (000199)	Surface water runoff during construction and operation	Discharge to surface water drainage network and subsequent discharge to River Mayne.	Mudflats and sandflats not covered by seawater at low tide [1140] Salicornia and other annuals colonising mud and sand [1310]

			Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330] Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410]
	Habitat loss/deterioration	Not within/adjoining and not suitable ex-situ habitat.	None.
	Wastewater	No wastewater discharge proposed	None.
	Species disturbance	Not within or adjoining habitats that are QI's and not impact in terms of species disturbance.	None.
Baldoyle Bay SPA (004016)	Surface water runoff during construction and operation	Discharge to surface water drainage network and subsequent discharge to River Mayne.	Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Shelduck (<i>Tadorna tadorna</i>) [A048] Ringed Plover (<i>Charadrius hiaticula</i>) [A137] Golden Plover (<i>Pluvialis apricaria</i>) [A140] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Wetland and Waterbirds [A999]

	Habitat loss/deterioration	Not within/adjoining and not suitable ex-situ habitat.	None.
	Wastewater	No wastewater discharge proposed	None.
	Species disturbance	Not within or adjoining habitats that are QI's and not impact in terms of species disturbance.	None.

Having regard to the above table, the only Natura 2000 sites that are considered to be at risk from the proposed development are: Baldoye Bay SAC (000199 and Baldoye Bay SPA (004016). The other Natura 2000 sites in the area are distanced further from the proposed development and, having regard to the lack of connectivity based on the source-pathway-receptor model, I do not consider that they are within the Zone of Influence. The following is a brief overview of the sites at risk:

Baldoye Bay SAC extends from just below Portmarnock village to the west pier at Howth in Co. Dublin. It is a tidal estuarine bay protected from the open sea by a large sand-dune system. Two small rivers, the Mayne and the Sluice, flow into the bay.

Baldoye Bay SPA, located to the north and east of Baldoye and to the south of Portmarnock, Co. Dublin, is a relatively small, narrow estuary separated from the open sea by a large sand dune system. Two small rivers, the Mayne River and the Sluice River, flow into the inner part of the estuary.

4. Likely significant effects on European site(s) 'alone'

Taking account of baseline conditions and the effects of ongoing operational plans and projects, this section considered whether there is a likely significant effect 'alone' as a result of the surface/groundwater mechanism.

Construction Stage

Given the proposal for excavation and construction works and the indirect hydrological connection through existing surface water drainage ditch that there is potential for discharge of sediments and pollutants during construction and impact on water quality within Balydoyle Bay SAC and SPA. Standard construction management measures good practice measures to ensure silt, dust, contamination and petrochemicals do not enter surface water bodies or groundwater would be sufficient to prevent impact on European sites and are not necessary included for the purposes of reducing or avoiding impact on European Sites. Such construction management measures are standard practice measures and not necessarily for the purpose of reducing or avoiding impact on European Sites (i.e. not mitigation measures).

Operational Stage

There is potential for contamination from hydrocarbons associated with proposed traffic routes and car parking, which could impact on water quality associated with the Natura 2000 sites (as discussed above). Surface water drainage from the deceleration lane and car parking area will be collected by gullies to an underground pipe and manhole system and conveyed through an attenuation storage system where flows will be discharged at a controlled rate through a class 1 bypass interceptor to discharge to the existing drainage ditch. Surface water in the raised observation area will be drained by permeable paving which include underground filter drains to connect to aforementioned underground pipe and manhole system and subsequently to attenuation as above. The proposed surface water drainage design is based on best practice SuDS measures and such

operational surface water measures form an integral part of the scheme and may not necessarily have been included for the purpose of reducing or avoiding impact on European Sites (i.e. not mitigation measures).

In-combination effects

There are a number of plan projects proposed/permitted in the vicinity, and such have been identified in the Planning History above (Section 4.0). The nature and scale of the proposed development is a stand-alone small-scale project that will have no significant effects on any European site alone. The stand-alone nature and small-scale of such taken in conjunction with fact that no mitigation measures are required for the purpose of reducing or avoiding impact on European Sites mean no in-combination effects are likely with any other plan or projects.

5. Conclusion-Screening Determination

'The proposed development has been considered in light of the assessment requirements of Sections 177U and 177V [or 177AE] of the Planning and Development Act 2000 as amended.

Having carried out screening for Appropriate Assessment of the proposed development, it was concluded that the proposed development alone would not result in likely significant effects on the Balydolye Bay SAC (000199) and the Badoyle Bay SPA (004016). The proposed development would have no likely significant effect in combination with other plans or projects on any European sites. No further assessment is required for the project.

No mitigation measures are required to come to these conclusions.

This conclusion is based on a complete assessment of all aspects of the proposed project and there is no reasonable doubt as to the absence of adverse effects.

Appendix 3

Water Framework Directive

WFD IMPACT ASSESSMENT STAGE 1: SCREENING			
Step 1: Nature of the Project, the Site and Locality			
An Coimisiun Pleanála ref no.	ABP-322859-25	Townland, address	Old Airport Road (Collinstown Lane), Dublin.
Description of project		Aircfat observation facility and associated site works	
Brief site description, relevant WFD Screening		The site, which 0.3 hectares in area is located on the southern side of the Old Airport Road (Collinstown Lane) and south of Dublin Airport. The appeal site consists of an area running along the southern side of the public road and includes an existing layby off the public road with an embankment running along its southern side. The western portion of the site (west of the layby) features a deeper embankment that is located along the southern edge of the public road and features a flat area on top. To south of the site is ditch and south of it is a line of trees and hedgerow. Adjoining lands include the public road to the north. The lands to the south include agricultural lands bounding the eastern half of the site and Na Fiannas Collinstown pitches adjoining the western half of the site.	
Proposed surface water details		SuDs system proposed including attenuation tank and hydrocarbon interceptor	

Proposed water supply source & available capacity	No water connection proposed
Proposed wastewater treatment system & available capacity, other issues	No wastewater connection proposed
Other?	

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 pressure on that water body	Pathway linkage to water feature (e.g. surface run-off, drainage, groundwater)	
River Waterbody	500m to the south of the site	River Mayne IE_EA_09M030500	Poor	No pressures	At risk	Yes – surface water drainage system serving the site hydrologically connected to watercourse	
Groundwater Waterbody	Underlying site	Dublin IE_EA_G_008	Good	Not at Risk	Not at risk	No – poorly draining soils offer protection to groundwaters	
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	Waterbody Receptor (EPA Code)	Pathway (existing and new)	Potential for impact/what is the	Screening Stage Mitigation Measures*		

				possible impact			
1.	Surface	River Mayne IE_EA_09M030500	Existing surface water drainage system serving the site	Siltation, pH (Concrete), hydrocarbon spillages	Standard construction practice CEMP	Yes – proximity to monitoring location warrants additional	Screened in
2.	Ground	Dublin IE_EA_G_008	Pathway exists but poor drainage characteristics	Spillages	As above	No	Screened out
OPERATIONAL PHASE							
3.	Surface	0010	Existing surface water drainage system in the area	Hydrocarbon spillage	SUDs features	No	Screened out
4.	Ground	0020	Pathway exists but poor drainage characteristics	Spillages	SUDs features	No	Screened out
DECOMMISSIONING 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 water chemical status	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)
	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:	

Construction works	Standard construction management measures to prevent discharge of sediment, concrete and hydrocarbons.	Standard construction management measures to prevent discharge of sediment, concrete and hydrocarbons.	NA	NA	YES
Stormwater drainage	Adequately designed SUDs features, permeable paving etc	Adequately designed SUDs features, permeable paving etc	NA	NA	YES