



An
Coimisiún
Pleanála

Inspector's Report ACP-323803-25

Development	EIA Determination Request - Synthetic Grass Sports Pitch at Greenhills Park, Dublin 12
Location	In the townlands of Greenhills and Limekilnfarm
Planning Authority	South Dublin County Council
Planning Authority Reg. Ref.	PT8SD292
Applicant(s)	Marston Planning Consultancy
Type of Application	EIA direction.
Planning Authority Decision	EIAR not required
Date of Site Inspection	29/01/2026.
Inspector	Hugh O'Neill

Contents

1.0 Introduction	Error! Bookmark not defined.
2.0 Site Location and Description	Error! Bookmark not defined.
3.0 Proposed Development	Error! Bookmark not defined.
4.0 Planning History.....	Error! Bookmark not defined.
5.0 Legislative & Policy Context	Error! Bookmark not defined.
6.0 Request for a Determination	Error! Bookmark not defined.
7.0 Response of developer (SDCC)	Error! Bookmark not defined.
8.0 Assessment.....	3
9.0 Conclusion.....	24
10.0 Recommendation	25
11.0 Reasons and Considerations.....	25

1.0 Introduction

This report is an addendum report to the Inspector's report in respect of ACP-323803-25 dated 06 February 2026.

On 12 February 2026 An Coimisiún decided to defer this case for consideration at a further meeting for the following reason:

The Commission noted that the Applicant was required by the Commission on the 29th day of October 2025 to provide the information specified in Schedule 7A of the Planning and Development Regulations, 2001 for the purposes of a screening determination. This information was received by the Commission on the 19th day of December 2025. The Inspector is therefore required to complete a Schedule 7A screening determination and provide an Addendum Report to the Commission for its further consideration.

2.0 Schedule 7A Information

In response to the request, by ACP dated 29/10/2025 the Planning Authority submitted all documents prepared for the Part 8 approval including an Environmental Impact Assessment Screening Report. This report includes a statement indicating how the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive have been taken into account.

The Planning Authority's submission received 19/12/2025 included:

- SDCC Greenhills Design and Access Statement
- Drawing 3465-SL-DR-010-LP-R00 Location Plan
- Drawing 3465-SL-DR-100-GA-R00 General Arrangement Plan
- Drawing 3465-SL-DR-200-DL-R00 Drainage Layout
- Drawing 3465-SL-DR-350-CD-R00 Construction Details
- Lighting Design
- Part 8 Public Notice (English)
- Cuid 8 Fógra Poiblí (as Gaeilge)

- Newspaper Notice
- AA Screening Report for the proposed development, Fehily Timoney and Company (12/09/2025)
- Ecological Impact Assessment Report for the proposed development, Fehily Timoney and Company (12/09/2025)
- EIA Screening Report for the proposed development, Fehily Timoney and Company (11/09/2025)
- Flood Risk Assessment for the proposed development, SEA Consulting Engineers, September 2025
- Drawing SDCC 3229-01 Greenhills Park Landscape Plan
- Drawing SDCC 3327-01 Site Notice Location Map
- Drawing SDCC 3327-03 Greenhills Park Proposed Pavilion
- Greenhills Wintering Bird and Badger Surveys, Envirico, April 2025
- Tree Survey Schedule
- Drawing 3328-01 Greenhills Tree Impacts Plan
- Drawing 3328-02 Greenhills Tree Survey
- EIA Screening Determination for the proposed development
- AA Screening Determination for the proposed development
- Response to EIA determination request relating to synthetic grass sports pitch at Greenhills Park, Dublin 12 dated December 2025.

3.0 **Schedule 7A Information in the screening determination**

I have prepared the following table to determine/demonstrate completeness or otherwise of the information listed in Schedule 7A.

Summary schedule 7A information.	Reference in submitted SDCC EIAR Screening report.	Reference in ACP inspectors report ACP-323803-25 dated	Requirement for EIA as per Schedule 7 criteria.
----------------------------------	--	--	---

		06 February 2026.	
1a. Description of the physical characteristics of the whole proposed development	Section 5	8.10	No
1b. Description of the location of the proposed development	Section 5	8.19	No
2. Description of the aspects of the environment likely to be significantly affected by the proposed development	Section 2	8.33, 8.38, 8.43, 8.48	No
3a. Description of any likely significant effects resulting from residues and emissions and the production of waste	Table 6-1	8.44, 8.46	No
3b. Description of any likely significant effects resulting from use of natural resources, in particular soil, land, water and biodiversity	Table 6-1	8.43, 8.38	No
4. The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7	Section 5 and paras 1 to 3 of section 6 and table 6.1	8.10, 8.11, 8.50, 8.38, 8.43, 8.33, 8.22, 8.23, 8.30	No

This tabular assessment /screening identified no information gaps in the data submitted in consideration of Schedule 7A.

4.0 Assessment

Having confirmed the completeness of the information in consideration of Schedule 7A and having previously determined the proposal is development listed in Part 2 of Schedule 5 the following is an extended presentation of the assessment, setting out the full text of each sub-heading of the 3 criteria set out in Schedule 7.

I have prepared this alternative presentation of the assessment to An Coimisiún for the avoidance of doubt and to address any concerns regarding the previous assessment.

4.1. Criteria 1 Characteristics of Proposed Development

4.1.1. The size and design of the whole of the proposed development.

4.1.2. The proposed development on a site of circa 1.6Ha comprises the following:

- Construction of a synthetic grass 3G all-weather sports pitch.
- Perimeter fencing and ball stop fencing at rear of each goal.
- 6 no. 21.3m high floodlighting columns.
- A single storey modular prefabricated pavilion building consisting of two individual team changing rooms, club storage area and ancillary facilities. 108.6sqm.
- All associated ancillary works in adjacent areas including but not limited to foul & surface water drainage and utility supplies.
- Realignment of existing footpath over a length of 112 metres.
- All related hard and soft landscape works including connecting footpaths and associated planting.
- Storage Areas.
- CCTV.

4.1.3. The size or design of individual components of the proposed development will in themselves not give rise to the potential for an effect of significance such that the development should be subject to an EIA.

4.1.4. Works required include the following:

- Felling existing trees within the proposed pitch boundary and removal of stumps.
- Removal of existing pathway to the east of the proposed site, reinstatement of new section with tarmac paving. (112 linear meters)
- Stripping of topsoil.
- Excavation of ground to formation level.
- Installation of drainage infrastructure.
- Build up for construction of pitch and spectator hardstanding area.
- Trenching and laying of electricity, foul water and water supplies. Connections for foul and water supply to be along the eastern perimeter of the proposed pitch, connecting into services at Saint James's Road to the South of Green Hills Park.
- Backfilling and reprofiling works.
- Fencing, 4.5m high twin wire perimeter fencing, 1.2m high rebound fencing, and 13m high ball stop netting.
- A temporary construction compound would be located to the western end of the development site.
- Planting of trees.

4.1.5. Further consideration is given below to individual impacts arising from the works for construction of the proposed development. However, in themselves the works will not give rise to the potential for an effect of significance such that the development should be subject to an EIA.

4.1.6. On completion the all-weather sports pitch is to be managed by SDCC. Access to and management of the proposed development will be via the Greenhills Community Centre which has extensive car parking which users of the proposal will be required to use.

4.1.7. As the proposed facility shall be usable for longer periods of the day and of the year temporal distribution of operational impacts will change. However, the enclosed nature and intensified management will result in greater formalisation and control of the use and impacts.

- 4.1.8. The proposed lighting has the potential to give rise to new impacts as there is no lighting of existing pitches. I note that the submitted EIA screening states that lighting has been specifically designed to address potential impacts, and reporting has been submitted in that regard.
- 4.1.9. The size of the proposal at circa 1.6ha is significantly below the threshold of 10Ha. The proposed development is of standard type of construction. There are no characteristics of the size or design of the proposed development at construction or operational phase which in themselves would give rise to the potential for an effect of significance such that the development should be subject to an EIA.
- 4.1.10. **Cumulation with other existing development and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment**
- 4.1.11. There are existing and permitted developments within the vicinity of the proposed development, the details of which have been provided in Appendix 2 of the submitted EIA Screening Report. I have reviewed the provided list and checked for additional projects in the area and have not identified any development which would be of a class specified in Part 2 of Schedule 5 of the Planning and Development Regulations 2001 but does not equal or exceed, as the case may be, the relevant quantity, area or other limit specified in that Part, or where it has been concluded, determined or decided:
- by a planning authority, in exercise of the powers conferred on it by the Planning and Development Act 2000 as amended or the Planning and Development Regulations 2001 as amended,
 - by the Board, (An Coimisiún) in exercise of the powers conferred on it by the Planning and Development Act 2000 as amended or the Planning and Development Regulations 2001 as amended,
 - by a local authority in exercise of the powers conferred on it by regulation 120 of Planning and Development Regulations 2001 as amended,

- by a State authority, in exercise of the powers conferred on it by regulation 123A of Planning and Development Regulations 2001 as amended,
- in accordance with section 13A of the Foreshore Act, by the appropriate Minister (within the meaning of that Act), or
- by the Minister for Communications, Climate Action and Environment, in exercise of the powers conferred on him or her by section 8A of the Minerals Development Act 1940,

that the proposed development is likely to have a significant effect on the environment.

4.1.12. Having regard to the characteristics of the proposed development I do not consider that there is potential for significant cumulative effects to occur on the environment.

4.1.13. **The nature of any associated demolition works.**

4.1.14. The development includes the removal of a section of footpath, excavation for construction of the base of the pitch and the removal of a number of trees. A comprehensive Construction Environmental Management Plan (CEMP) will be adopted and adhered to by the appointed contractor to ensure that the demolition works will not be likely to give rise to a significant environmental impact.

4.1.15. See further consideration below of effects arising from works under criteria 3 of Schedule 7, types and characteristics of impacts.

4.1.16. In consideration of the characteristics of the proposed development and the nature of associated demolition works I do not consider that there is potential for significant effects to occur on the environment.

4.1.17. **The use of natural resources, in particular land, soil, water and biodiversity.**

4.1.18. Whilst the site itself is on the face of it established greenfield in nature, the loss of that established natural resource requires consideration. See further consideration below of effects arising from works under criteria 3 of Schedule 7, types and characteristics of impacts under biodiversity and population and human health in particular.

- 4.1.19. Impacts on land as a natural resource in itself will not result in a significant impact for the purpose of determining a requirement for EIA.
- 4.1.20. The proposed development will be expected to adopt standard construction measures. A development of this nature will inevitably use natural resources and materials during construction. The natural resources such as stone, aggregates and aggregate products will be used for the purposes they were produced for. It is not anticipated that large quantities of rare or unusual materials will be utilised on such a development and for that reasons would not result in an impact of significance to require EIA.
- 4.1.21. The use of water during the construction phase will be temporary. This will not result in a high volume of water usage. The completed development, during its operational phase will provide a water supply to the single storey pavilion building, it is not anticipated that during operational phase that the pavilion building will result in a volume of water usage such that it would be considered significant in consideration of the requirement for EIA.
- 4.1.22. Land, soil, water, air and climate are given further considering in relation to criteria 3 of schedule 7 below.
- 4.1.23. Having regard to the characteristics of the proposed development, I consider it unlikely that there is a risk of significant effects on the environment having regard to Land, soil, water, air and biodiversity.
- 4.1.24. **The production of waste**
- 4.1.25. A Construction Environmental Management Plan (CEMP) will be adopted and adhered to by the Contractor and will to ensure minimal production and risk arising from the production of waste. The largest volume of waste is likely to be in the form of excavated soil and stone during the initial earthworks in excess of that which can be utilised within the development. The possibility of reclassifying this material as a by product under Article 27 of the European Communities (Waste Directive) Regulations 2011 is acknowledged however, the scale of the works involved in the excavation, management and haulage of this material is not considered to be of a magnitude that it represents a significant effect in the criteria for determination of the need for EIA.

- 4.1.26. The proposed development is not foreseen to produce a significant quantity of waste. Any waste generated will be managed at an appropriately authorised off-site waste management facility.
- 4.1.27. Waste will be generated during operational phase which will be of a quantity that is not of concern to the determination and will be managed by South Dublin County Council within existing waste management procedures.
- 4.1.28. Production of waste is a consideration under multiple Schedule 7 criteria sub-headings including pollution and nuisance and population and human health as set out below.
- 4.1.29. Having regard to the characteristics of the proposed development, I consider it unlikely that there is a risk of significant effects on the environment having regard to the production and management of waste materials or by products attributable to the construction and occupation of the proposed development.
- 4.1.30. **Pollution and nuisances**
- 4.1.31. The construction phase has the potential to result in some local disruption as a result of increased traffic volumes. The commitment within the proposal for a CEMP to be prepared adopted and adhered to by the contractor will provide measures in relation to traffic management including the provision of a site-specific traffic management plan. Further consideration of pollution and nuisance is set out below in consideration of the subheading population and human health under criteria 3 of Schedule 7.
- 4.1.32. The operational phase is to be managed as a community resource by SDCC and as such I anticipate it will be operated in a manner that takes account of pollution and nuisance.
- 4.1.33. Having regard to the characteristics of the proposed development, it is considered unlikely that there is a risk of significant effects on the environment as a result of pollution and nuisances.
- 4.1.34. **The risk of major accidents, and/or disasters relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge**

- 4.1.35. The construction phase of the development will be required to comply with the Safety, Health, and Welfare at Work (Construction) Regulations 2013 and ensure all necessary emergency procedures are in place as required. The CEMP will include a requirement that the site will be enclosed with perimeter hoarding to secure the site and prevent unauthorised access by the public into work zone areas.
- 4.1.36. The site is not located in the vicinity of any Seveso / COMAH sites.
- 4.1.37. Having regard to the characteristics of the proposed development, it is considered unlikely that there is a risk of major accidents and/or disasters including those caused by climate change.
- 4.1.38. **Risks to human health.**
- 4.1.39. The main potential for risk to human health is during the construction phase. The construction phase of the development will be required to comply with the Safety, Health, and Welfare at Work (Construction) Regulations 2013 and ensure all necessary emergency procedures are in place as required. Further considerations for criteria 3 of schedule 7 as they relate to population and human health are set out below.
- 4.1.40. Potential risks to human health arising from water contamination, air pollution, noise etc, are considered to be unlikely.
- 4.1.41. Having regard to the characteristics of the proposed development the risk of significant effects on the environment in consideration of risks to human health in construction and operational phase is unlikely.
- 4.1.42. **Conclusion in consideration of criteria 1 Schedule 7.**
- 4.1.43. Having regard to the characteristics of the proposed development, it is considered unlikely that there is a risk of significant effects on the environment as a result of the characteristics of the proposed development.

4.2. **Criteria 2, Location of the proposed development. The environmental sensitivity of geographical areas likely to be affected by the proposed development.**

4.2.1. The proposal and the report to inform the EIA determination was supported by surveys and reporting that describe the location of the proposal in detail. I have taken each of these reports as well as the subsequent response to EIA determination request report into account in the assessment of criteria 2 of Schedule 7.

4.2.2. **Existing and approved land use**

4.2.3. The proposal is located in an urban park in *a built-up area*.

4.2.4. Greenhills Park, including the community sports and leisure centre to the east, are subject to open space zoning objective which seeks to *preserve and provide for open space and recreational amenities*.

4.2.5. Greenhills Park open space zoning extends to circa 8ha consisting primarily of active open space including grass pitches of various sizes and an artificial surface bowling green.

4.2.6. The development is proposed in the location of and replacing existing grass pitches to the western side of Greenhills Park. The footprint of the development is dominated by existing amenity grassland laid out, managed and used as sports pitches, a tarmacadam footpath and associated trees.

4.2.7. There are a number of areas of grass unsuitable for sports pitches within the park which are managed for biodiversity.

4.2.8. Having regard to the location of the proposed development, it is considered unlikely that there is a risk of significant effects on the environment as a result of the environmental sensitivity of the existing and approved Land Use.

4.2.9. **Relative abundance, availability, quality and regenerative capacity of natural resources**

4.2.10. There are multiple open spaces in residential areas in the wider area incorporating grass pitches. Tymon Park is a regional scale park located at a distance of c. 300m

to the south of Greenhills Park and extends to and along the eastern boundary of the M50.

4.2.11. The proposal will entail the removal of grassland of high amenity and low biodiversity value with an artificial surface of increased amenity value and no biodiversity value with no regenerative capacity. However, the proposal includes biodiversity enhancements outside the footprint of the proposed pitch and creates potential for a broader range of management regimes in the footprint of the existing grass pitches which is it proposed to replace with enhanced regenerative capacity in these locations arising as an indirect consequence of the proposal.

4.2.12. Having regard to the location of the proposed development, it is considered unlikely that there is a risk of significant effects on the environment as a result of the environmental sensitivity in consideration of the relative abundance, availability, quality and regenerative capacity of natural resources.

4.2.13. **The absorption capacity of the existing natural environment**

4.2.14. The immediate existing natural environment is that of an urban park managed primarily for active recreation. As such the park generally has absorptive capacity for the proposal and will therefore not result in any potential impact giving rise for a need for EIA.

4.2.15. Further consideration of the each of the sub-heading of sub-criteria 2c are as follows:

4.2.16. **wetlands, riparian areas, river mouths**

4.2.17. The project site falls into CAMAC_040 sub-basin (IE_EA_09C020500), which forms part of the larger Liffey sub-catchment (Liffey_SC_090), and the Poddle_010 sub-basin (IE_EA_09P030800) which forms part of the Dodder sub-catchment (Dodder_SC_010) and all of which are part of the Liffey and Dublin Bay Catchment (ID: 9). There are no water bodies or surface water connections to water bodies within the site. The groundwater body underlying the site is recorded as Dublin IE_EA_G_008.

4.2.18. Given the distance from the site from the nearest wetland, riparian zone, river mouth there is no likely potential for impact as a result of construction works or the future use of the completed development.

4.2.19. Having regard to the location of the proposed development, it is considered unlikely that there is a risk of significant effects on the environment as a result of the environmental sensitivity in respect of the absorption capacity of the natural environment, paying particular attention to wetlands, riparian areas, river mouths.

4.2.20. **Coastal zones and the marine environment**

4.2.21. The proposal is located circa 9 km inland from the coast with no direct connectivity and separated by urban development.

4.2.22. Having regard to the location of the proposed development and absence of connectivity, and absorptive capacity of the coastal zone it is considered unlikely that there is a risk of significant effects on the environment as a result of the environmental sensitivity in respect of the absorption capacity of the natural environment, paying particular attention to coastal zones and the marine environment.

4.2.23. **Mountain and forest areas**

4.2.24. The closest mountain and forest areas (commercial) to the subject site are circa 5 and 6 km south with urban development dominating the separating land uses.

4.2.25. Having regard to the location of the proposed development distance and absence of connectivity, it is considered unlikely that there is a risk of significant effects on the environment as a result of environmental sensitivity having regard to the absorption capacity of the natural environment, paying particular attention to mountain and forest areas.

4.2.26. **Nature reserves and parks**

4.2.27. The closest nature reserve is Knocksink Wood at a distance of circa 13.6 km from the site with no connectivity.

4.2.28. Taking account of distance, the absence of connectivity, as well as the scale and nature of the works considered under Criteria 1 above I consider it unlikely that there

is a risk of significant effects on the environment as a result of the environmental sensitivity having regard to the absorption capacity of the natural environment, paying particular attention to Nature Reserves.

4.2.29. The proposal is within a park and is surrounded by number of other urban parks, Tymon Park being the most significant of these as described elsewhere. There is absorptive capacity of parks taking account of the characteristics of the development is described in the consideration of the Criteria 1(d) above, (the use of natural resources, in particular land, soil, water and biodiversity) and in the consideration of Criteria 3 below. Of particular relevance to the location of the proposal and absorptive capacity of parks are the considerations of Population and Human Health and Biodiversity below.

4.2.30. By virtue of its location within a park the proposal will result in impacts on Greenhills Park. However, taking account of location and characteristics of the proposed development as considered under Criteria 1 above I consider it unlikely that there is a risk of significant effects on the environment as a result of the environmental sensitivity having regard to the absorption capacity of the natural environment, paying particular attention to parks.

4.2.31. **Areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive**

4.2.32. Detailed consideration of protected species and habitats was set out at section 8.38 of the inspector's report of 06/02/26 and is repeated in this report in consideration of criteria 3 of Schedule 7 below for completeness.

4.2.33. The proposal does not impact on any areas protected under legislation including Natura 2000 areas.

4.2.34. Taking account of distance, the absence of connectivity, as well as the scale and nature of the works considered under Criteria 1 above and types and characteristics of potential impacts considered under Criteria 3 below I consider it unlikely that there is a risk of significant effects on the environment as a result of the environmental sensitivity having regard to the absorption capacity of the natural environment, paying particular attention to areas classified or protected under legislation, including

Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive.

4.2.35. Areas in which there has already been a failure to meet the environmental quality standards laid down in legislation of the European Union and relevant to the project, or in which it is considered that there is such a failure

4.2.36. The proposed development as with any construction project is expected to comply with the relevant Statutory Legislation including the Local Government (Water Pollution) Acts, 1977 and 1990. The appointed contractor will be required to cooperate in full and thereby ensure no significant effects.

4.2.37. In the operational phase the project shall be connected to the public foul sewer. Surface water drainage is proposed to continue to groundwater within a designed collection and discharge system.

4.2.38. Having regard to the location of the proposed development, it is considered unlikely that there is a risk of significant effects on the environment as a result of the environmental sensitivity having regard to the absorption capacity of the natural environment, paying particular attention to areas in which there has already been a failure to meet the environmental quality standards laid down in legislation of the European Union and relevant to the project.

4.2.39. Densely populated areas

4.2.40. The area in which the development is proposed is of medium residential density with a substantial open space provision with clear capacity to absorb the proposal. Potential for impacts arising from noise and nuisance are set out in consideration of population a human health under criteria 3 of schedule 7 below.

4.2.41. Having regard to the location of the proposed development, I consider it unlikely that there is a risk of significant effects on the environment as a result of the environmental sensitivity having regard to the absorption capacity of the natural environment, paying particular attention to densely populated areas.

4.2.42. Landscapes and sites of historical, cultural or archaeological significance

4.2.43. There are no sites on the Sites and Monuments Record, the Record of Monuments and Places or the National Inventory of Architectural Heritage, Architectural or archaeological sites located within or proximate to the site boundary.

4.2.44. Having regard to the location of the proposed development, it is considered unlikely that there is a risk of significant effects on the environment as a result of the environmental sensitivity having regard to the absorption capacity of the natural environment, paying particular attention to Landscapes and sites of historical, cultural or archaeological significance.

4.2.45. **Conclusion in consideration of Criteria 2 of Schedule 7**

4.2.46. Having regard to the location of the proposed development, it is considered unlikely that there is a risk of significant effects on the environment as a result of the environmental sensitivity having regard to the sub-criteria as described above considered individually and collectively.

4.3. **Criteria 3, Types and characteristics of potential impacts.**

4.3.1. **Population and human health**

4.3.2. There will be construction impacts primarily relating to disturbance, including as a result of increased traffic flows and noise associated with delivery of machinery, materials and workers accessing the site during the construction phase. Whilst this may result in some localised disruption to residents and road users, it will be short term and will not result in significant effects. These impacts will be localised, of short duration and capable of effective mitigation by good construction practices and effective traffic management which are to be set out by the appointed contractor in a CEMP and construction traffic management plan.

4.3.3. There is potential for operational phase impacts relating to disturbance as a result of changes to volumes and/or frequency of use including noise and traffic flows relative to the existing baseline. The site is located in an urban environment dominated by road traffic. There is a large church, and 3 schools on the periphery of Greenhills Park. The community centre facilitates various clubs and community functions. The existing sports pitches are subject to regular formal, and informal use. Each of these uses contribute to the existing traffic and noise environment.

- 4.3.4. The displacement of 3 grass pitches without lighting by a single pitch (divisible) with lighting will alter daily and seasonal use patterns. However, in the context of the background established baseline activity levels which generate traffic and noise within and in the immediate vicinity of the proposal I do not consider the changes in use profile of the park, will result in an impact affecting the sensitivities of Population and Human Health. Therefore, I consider that Population and Human Health will not be impacted by traffic and noise to an extent that an EIAR would be required.
- 4.3.5. The proposed lighting could give rise to new impacts. I note that the response to the SDCC to the request for determination states that the light spill assessment undertaken for the Part 8 planning process has demonstrated the lighting will not adversely affect residential amenity in the surrounding area. I conclude, on the basis of the lighting impact as modelled that lighting shall not impact on Population and Human Health to an extent that an EIAR would be required.
- 4.3.6. Therefore, taking into account of the magnitude and spatial extent, nature, intensity, probability, expected onset, duration, frequency and reversibility of impact on Population and Human Health, both individually and/or in cumulation with other projects, it is considered unlikely that there is a risk of the proposal giving rise to significant effects on the environment.
- 4.3.7. **Biodiversity, with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive**
- 4.3.8. There will be a direct impact on biodiversity primarily by removal of grasslands and replacement with an artificial surface. As a result of sports pitch management, the subject area of grass to be removed is of low biodiversity value and for that reason of low sensitivity.
- 4.3.9. The removal of the grassland will result in an indirect impact on bird species found to utilise the grassland for resting, feeding and roosting. Impacts on Annex Species are considered in detail in the Appropriate Assessment Screening undertaken in preparation for the consent process by SDCC. An application to ACP for a determination under Article 250 was submitted in parallel with the EIA determination and was assigned reg ref: ACP-323804-25. Having regard to the numbers of birds observed and taken in combination with the extent of open amenity grassland both

within Greenhills Park not impacted by the proposal and of parkland in the wider vicinity, I consider it unlikely that there is a risk of significant effects on the environment as a result of the environmental sensitivity having regard to Biodiversity including species and habitats protected under the Habitats Directive and the Birds Directive.

- 4.3.10. I note evidence of potential fox and badger activity in Greenhills Park was recorded in the wintering birds and badger survey undertaken for the project. The replacement of the grassland may result in removal of foraging area and potential displacement of these species. No setts or dens will be impacted by the proposal. Taking account of the abundance of alternative opens pace including private gardens in the immediate and wider vicinity of the proposal as well as biodiversity measures proposed as part of the project, I considered it unlikely that there is a risk of significant effects on the environment as a result of the environmental sensitivity having regard to Biodiversity.
- 4.3.11. The removal of trees will impact directly and indirectly on biodiversity. However, taking account of the nature of the trees including as described in the submitted tree survey data, and the detailed proposal including the timing of the removal and additional tree planting proposed I do not consider the impact on biodiversity to be significant.
- 4.3.12. Therefore, taking into account the magnitude and spatial extent, nature, intensity, probability, expected onset, duration, frequency and reversibility of impact on biodiversity, both individually and/or in cumulation with other projects, I consider it unlikely that there is a risk of the proposal giving rise to significant effects on the environment in consideration of Biodiversity, with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive
- 4.3.13. **Land, soil, water, air and climate.**
- 4.3.14. Characteristics of the proposed development related to land, soil and water are set out in consideration of criteria 1 above.
- 4.3.15. There will be an impact on land and soil in the construction of the proposal with excavation required, placement of imported materials and covering with artificial surface. Taking account of the modest extent and nature of works I consider the

development is unlikely to result in any significant physical changes to sensitivities in the locality of a magnitude to give rise to an environmental impact of significance.

- 4.3.16. There are no surface water features in the vicinity of the proposal. Surface water drainage of the pitch area is proposed to continue to ground via a stone base beneath the pitch with a supplementary additional lateral piped collection network beneath the pitch draining to a soakaway.
- 4.3.17. Potential construction related impacts consist of hydrocarbons and other spillages. These potential impacts are to be mitigated by good construction practices.
- 4.3.18. In operation, the surface water drainage will continue the existing hydrological regime with diffuse discharge to groundwater. The drainage aspects of the proposal are unlikely to give rise to any environmental impact on water.
- 4.3.19. Potential construction related impacts on air are limited to release of dust during the construction phase. These potential impacts are mitigated by good construction practices and are not considered to be significant.
- 4.3.20. Potential climate impacts are limited to, plant and equipment run on fossil fuels during the construction phase and lighting by high efficiency LED lighting during operational phase. It is not anticipated that the development will result in significant effects to climate due to the scale of the development and the short-term duration of the works.
- 4.3.21. Therefore, taking into account the magnitude and spatial extent, nature, intensity, probability, expected onset, duration, frequency and reversibility of impact on Land, soil, water, air and climate, both individually and/or in cumulation with other projects, it is considered unlikely that there is a risk of the proposal giving rise to significant effects on the environment in consideration of Land, soil, water, air and climate.
- 4.3.22. **Material assets, cultural heritage and the landscape.**
- 4.3.23. It is expected that the development will enhance the material asset that is Greenhills Park.
- 4.3.24. The surrounding road network includes the R819, the R818, the R112, the M50 and the R838 these road and the wider road network are considered capable of accommodating the traffic which shall be generated over the construction phase with

the benefit of the construction traffic management plan. I therefore consider the development will not result in a significant impact on the environment by way of effect on roads.

4.3.25. Due the absence of sensitivity the proposal will not result in any direct or indirect impacts on, cultural heritage or landscape as described in consideration of the location of the proposed development under criteria 2.

4.3.26. Therefore, taking into account the magnitude and spatial extent, nature, intensity, probability, expected onset, duration, frequency and reversibility of impact material assets, cultural heritage and the landscape, both individually and/or in cumulation with other projects, it is considered unlikely that there is a risk of the proposal giving rise to significant effects on the environment.

4.3.27. The interaction between the above factors

4.3.28. There is potential for interaction between the various environmental factors, such as between biodiversity and landscape and between human health and water. However, taking account of the nature, scale and location of the subject proposal, along with the various mitigation measures proposed, and the intensity or significance of the predicted impacts within each respective environmental factor being at the very least, not significant, I consider it unlikely that significant effects will arise from the interaction between the factors.

4.3.29. Transboundary nature of the impact

4.3.30. There will be no transboundary impacts associated with the proposed development. The development will be contained within a defined site boundary without proximity to any boundaries of relevance to the consideration of transboundary environmental impacts.

4.3.31. The intensity and complexity of the impact

4.3.32. The construction and operation are of standard nature. Operation of the proposal will lead to an altered pattern of use, with intensification of periods relative to that which it is replacing. However, the impacts on each environmental factor as set out above

having considered the intensity and complexity of the proposal in construction and operation are predicted at very least as not significant.

4.3.33. The probability of the impact,

4.3.34. The probability of the development being implemented and generating the various effects considered above is high, the probability of those effects becoming significant is negligible.

4.3.35. The expected onset, duration, frequency and reversibility of the impact,

4.3.36. Onset of construction impacts will be slow with enabling works, establishment of compounds and delivery of plant machinery and materials at the outset. Construction is proposed to occur 08:00 to 18:00 Monday to Friday only and of short duration taking account of the small extent, largely mechanised and straightforward construction methods.

4.3.37. Potential for Cumulative Impacts with other Existing and/or Approved Projects

4.3.38. There are a number of permitted developments within the vicinity of the proposal, the details of which have been provided in Appendix 2 of the EIA Screening Report and which are considered further under Criteria 1 of schedule 7 above. I have reviewed this list checked for additional projects in the area. I do not consider that there is potential for significant cumulative effects to occur on the environment.

4.3.39. The possibility of effectively reducing the impact

4.3.40. I am satisfied that the implementation of standard best practice methodologies during the construction phase of the proposed development as planned and the management of the facility by SDCC will result in a reasonable probability of effectively reducing potential impacts. The operation of the development is to be managed by SDCC as a community facility and as such there is a high possibility of effectively reducing any operational impacts arising.

4.4. **Measures to Avoid Significant Adverse Effects on the Environment**

- 4.5. The EIAR screening states that mitigation has been embedded and integrated into the design of the proposal I am satisfied that this is the case. The proposal commits to the implementation of a construction and environmental management plan as well as a construction traffic management plan which will both serve to mitigate potential impacts by means of operating to standard best practice.
- 4.6. Stormwater attenuation/treatment measures are designed into the proposal in accordance with sustainable drainage system principles allowing for climate change.
- 4.7. Mitigation for felling of trees includes replacement planting and timing of felling.
- 4.8. The construction phase mitigation measures as presented are typical and standard practice for most developments of this type and scale and are well established in terms of being implementable and effective and will contribute positively towards the development in terms of minimising any effects that may arise during construction of the project.
- 4.9. SDCC will mitigate operational phase impacts of the proposal including the requirement for users of the facility to park in the community centre.
- 4.10. Lighting has been designed in accordance with best practice of mitigating impacts on residential amenity and on bats.

4.11. **Other Relevant Information**

- 4.12. I have considered the concerns set out in the request for a determination relating to cumulative impacts and project splitting. I do not consider the city edge project as referenced to give rise to any cumulative impacts. I have not identified any plans or projects of SDCC from which the proposal could have been split from for the purpose of avoiding the undertaking of an EIAR. I am satisfied that the determination by SDCC screening out the need for EIAR in the case is not project splitting.

5.0 **Conclusion**

Having regard to the above assessment, it is considered that the proposed development was found to be unlikely to have significant effects on the environment,

and accordingly, an Environmental Impact Assessment is not required. I therefore repeat the recommendation of report ref: R323803 and expanded the reasons and considerations to refer to Schedule 7A of the Planning and Development Regulations and Annex II.A of the EU EIA Directive 2014/52/EU as follows.

6.0 Recommendation

It is therefore recommended that South Dublin County Council be advised that the preparation of an Environmental Impact Assessment Report is not required in respect of the proposed Synthetic Grass Sports Pitch at Greenhills Park, Dublin 12 for the reasons and considerations set out below.

7.0 Reasons and Considerations

Having regard to the following:

- a) The provisions of Section 179 of the Planning and Development Act, 2000, as amended and Article 120 (3)(b) of the Planning and Development Regulations, 2001 (as amended),
- b) The criteria for determining whether development listed in Part 2 of Schedule 5 should be subject to an Environmental Impact Assessment as set out in Schedule 7 and Annex III of the EU EIA Directive 2014/52/EU,
- c) The nature and scale of the proposed development which is significantly under the threshold in respect of (Class 10 (b)(iv) (Infrastructure – Urban Development) of Part 2 of Schedule 5 of the Planning and Development Regulations, 2001 (as amended),
- d) The location of the site on lands subject to an open space zoning objective which seeks to preserve and provide for open space and recreational amenities in the South Dublin County Development Plan 2022-2028, and the strategic environmental assessment of this Plan undertaken in accordance with the SEA Directive (2001/42/EC),
- e) The scale of the proposed development,
- f) The existing active recreational use of the site,
- g) The pattern of urban development in the vicinity,

- h) The submission made as part of the request for a determination,
- i) The submission made by the local authority, including the Environmental Impact Assessment Screening Report prepared by the Local Authority to support the Part 8 Approval process which includes the information required by schedule 7A of the planning and Development Regulations 2001 as amended and Anex II.A of the EU EIA Directive 2014/52/EU.
- j) The report and recommendation of the Planning Inspector,

It is considered that the proposed development would not be likely to have significant effects on the environment and accordingly, that the preparation and submission of an Environmental Impact Assessment Report is therefore, not required.

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 me, directly or indirectly, following my professional assessment and recommendation set out in my report in an improper or inappropriate way.

Hugh O'Neill
Planning Inspector
25 March 2026