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**An Bord Pleanála Oral Hearing  
Greater Dublin Drainage Project**

**Presentation by Fingal County Council**

**Friday, 22<sup>nd</sup> March 2019**

<b>AN BORD PLEANÁLA</b>	
TIME <b>15:00</b>	BY _____
<b>22 MAR 2019</b>	
LTR DATED _____	FROM _____
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## **Introduction**

1. The proposed Greater Dublin Drainage project is supported by Fingal County Council (hereafter referred to as "FCC").
2. The project is in accordance with the National Planning Framework, the National Development Plan, the Regional Planning Guidelines for the Greater Dublin Area and the Fingal Development Plan 2017 – 2023.
3. The Chief Executive's Report as provided to An Bord Pleanála in September 2018 sets out FCC's support for the project.
4. In addition, this presentation addresses, in two parts, FCC's response to the Irish Water Document of January 2019 and the matters raised by An Bord Pleanála in the oral hearing agenda.
5. Part 1 includes:
  - How the development sits within the greenbelt policy
  - Development Contributions;
  - Further comment on the matter of planning gain;
  - Improved permeability;
  - Water quality (bathing and shellfish);
  - Noise at Connolly Hospital;
  - Hedgerows and Trees;
  - Biodiversity – compound 9 and 10;
6. Part 2 includes:
  - Natura Impact Statement.

## **Part 1**

### **Greenbelt Policy**

(Colm McCoy – Senior Planner, David Murray – Senior Executive Planner)<sup>1</sup>–

7. An Bord Pleanála has sought further clarification on the Greenbelt zoning policy. In response, the proposed development is considered to be a project of regional scale but with national importance. This is recognised and reflected in the Fingal County Development Plan 2017-2023 and as such the project has been assessed in that

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<sup>1</sup> The contributors to the response on behalf of Fingal County Council are set out in **Appendix A** to this submission.



context. The impact of the proposed development on zoning was assessed taking account the Development Plan as a whole.

8. The project in its entirety spans a significant portion of County Fingal on a west to east axis and in doing so traverses several different land use zones.

9. For example, Chapter 11.1 of the Development Plan provides as follows:

“Zoning aspires to promote the orderly development of the County by eliminating potential conflicts between incompatible land uses and to establish an efficient basis for investment in public infrastructure and facilities. Zoning policy must also have regard to the strategic policies underlying the Development Plan....Uses which are neither ‘Permitted in Principle’ nor ‘Not Permitted’ will be assessed in terms of their contribution towards the achievement of the zoning objective.” (page 363).

10. It is considered the proposed project is a utility installation.

11. As a utility installation project, this refers to all aspects of the development as indicated in public notices including the orbital sewer, diversion sewers, outfall pipes, pumping stations and waste water treatment campus (inclusive of all three zones therein – preliminary treatment/sedimentation, biological treatment and settlement and sludge treatment).

12. Taking the aforementioned into consideration, together with the strategic and regional scale of the project, the weight of policy support for this project is an important factor and this is clearly evident in the Fingal Development Plan.

13. Considering the Development Plan in the round, the importance of the project has been captured in the strategic policy at the outset of the Development Plan (Strategic Policy 17, page 10) and a number of objectives which specifically refer to the project, including the location of Clonsaugh for the provisions of waste water treatment (which is detailed later in this presentation).

14. In considering the proposed project, Fingal County Council also considered the National Wastewater Sludge Management Plan (NWSMP) which identified that the Fingal Sludge Management Plan recommended provision of a sludge hub within the proposed WWTP and which indicates in table 3.4 (page 24) that the current status for Fingal is that a sludge hub is planned as part of the GDD WWTP.

15. Regarding policy support for the waste-water treatment campus, the management plan goes on to state that sludge volume reduction is provided at waste-water treatment plants to reduce carbon footprint, traffic, odour and noise, re-enforcing



that sludge treatment facilities are an integral part of a sustainable waste-water treatment plant. Furthermore provision of sludge hubs within waste-water treatment plants facilitates greater efficiencies in energy recovery from the sludge product. Table 7.1 of the NWSMP (p46) indicates 24 locations where sludge hubs are an integral part of waste-water treatment plants, including Ringsend, Upper Liffey Valley in Kildare and Shanganagh. FCC note that the extension to the sludge processing facilities in Ringsend under PL29N.YA0010 was considered an extension to the waste-water treatment plant and was assessed as a 'public service installation'.

16. Accordingly, there is strong policy support for the project and the location of Clonshaugh for the development including the waste water treatment plant and sludge hub.
17. Clonshaugh was identified as one of three emerging preferred sites at the first pre-planning meeting with An Bord Pleanala in 2013 as evidenced in notes made available in June 2018. The Clonshaugh site was identified as the preferred site at An Bord Pleanala pre-planning meeting 2 in February 2014. The site was zoned Green Belt and also High technology under the Development Plan 2011 – 2017 which was in force at that time. A utility installation was neither permitted, nor not permitted on the Green Belt zoning and permitted in principle under the HT zoning, both of which affect the site.
18. It is noted from the An Bord Pleanala pre-planning that the applicant considered that the proposed development to be *'open for consideration (in Greenbelt) and is supported by Development Plan and policies. Part of the site is also zoned high technology where utilities are permitted.'* Irish Water set out the need for the WWTP to be located in Clonshaugh at meeting 2 in 2014, having regard to technical, environmental and financial assessment of the three shortlisted sites. This is further set out in detail in paragraph 86-87 of the applicant's January 2019 response.
19. The zoning of the lands remained unchanged between the Development Plan 2011 – 2017 and 2017 – 2023. While a statement within p136-137 of the 2011 – 2017 Plan makes reference to the Regional Treatment Plant, no location is specified. In contrast, p270 – 271 (policy introduction) within the 2017 – 2023 Plan specifically states:-

*'Irish Water is developing the Greater Dublin Drainage (GDD) Project (previously led by Fingal County Council). The GDD is a regional wastewater project designed to serve the Greater Dublin Area by augmenting the Ringsend Wastewater Treatment Plant. It implements the recommendations of the GDSDS Final Strategy and the SEA of the GDSDS.'*



*The project includes:*

- *A planned treatment plant at Clonshaugh in Fingal,*
- *A marine outfall discharging approximately 1km north east of Irelands Eye, and*
- *An orbital sewer with two pumping stations – at Abbotstown, Blanchardstown and Grange, Baldoyle – which will divert wastewater from the southern areas of Fingal and the north of Dublin City to the new treatment plant. ‘*

20. Objective WT03 states:-

*‘Facilitate the provision of appropriately sized and located waste water treatment plants and networks including a new Regional Wastewater Treatment Plant and the implementation of other recommendations of the Greater Dublin Strategic Drainage Study, in conjunction with relevant stakeholders and services providers, to facilitate development in the County and Region and to protect the water quality of Fingal’s coastal and inland waters through the provision of adequate treatment of wastewater.*

21. It is considered that the policy context clearly sets out that facilitation of the Greater Dublin Drainage Project, along with integral provision of a large waste water treatment plant in Clonshaugh is an objective of the Fingal Development Plan 2017 - 2023.

22. Furthermore, Objective WT05 states:-

*Seek the best available technology in all waste water treatment plants proposed for the County.*

23. In this regard, the provision of a sludge hub within the waste water treatment plant at Clonshaugh is considered to demonstrate provision of a sustainable and integral element of any modern public infrastructural utility.

#### **Greenbelt Policy and WWTP Campus**

24. The Greenbelt zoning within the Fingal Development Plan 2017–2023 covers an area largely corresponding with undeveloped lands contained within the metropolitan area as set out in the Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022 (RPGs).

25. Section 4.6 of the RPG’s indicates that ‘such areas that divide the built-up areas of towns from each other or the city shall be identified as long term green belt lands to



avoid their future coalescence and the loss of definition between rural and urban places'. The campus location of the project is largely on Greenbelt zoned lands.

### **Compliance with vision and objectives**

26. The zoning, vision and supporting Objectives for the Greenbelt from the Fingal Development Plan 2017 – 2023 are set out below.

#### ***Greenbelts – (p42 of Development Plan)***

*The targeted development of strategically identified towns and villages will be supported by a greenbelt policy which will safeguard the innate rural value of the Fingal countryside. Greenbelt zoning will underpin the settlement strategy by ensuring:*

- Existing urban areas within Fingal do not coalesce and merge into one another leading to unsustainable development and travel patterns.*
- The identity and unique character of rural and urban areas in the vicinity of administrative boundaries will be maintained where this would be beneficial.*
- That citizens can enjoy the visual and natural amenities of the countryside in close proximity to the urban areas in which they reside.*
- Proposed development within the Greenbelt shall clearly demonstrate a functional need for such a location, and consistency with the established character of the landscape of the area.*

#### ***Vision for the zoning***

*Create a rural/urban Greenbelt zone that permanently demarcates the boundary (i) between the rural and urban areas, or (ii) between urban and urban areas. The role of the Greenbelt is to check unrestricted sprawl of urban areas, to prevent coalescence of settlements, to prevent countryside encroachment and to protect the setting of towns and/or villages. The Greenbelt is attractive and multifunctional, serves the needs of both the urban and rural communities, and strengthens the links between urban and rural areas in a sustainable manner. The Greenbelt will provide opportunities for countryside access and for recreation, retain attractive landscapes, improve derelict land within and around towns, secure lands with a nature conservation interest, and retain land in agricultural use. The zoning objective will have the consequence of achieving the regeneration of undeveloped town areas by ensuring that urban development is directed towards these areas.*



### ***Sensitivity of the landscape to change***

27. Differing parts of the Greenbelt are covered by landscapes of differing sensitivity, according to the Landscape Character Assessment within page 326 – 332 of the Development Plan. The site (i.e. WWTP campus) is located within the 'Low Lying Character Type' which has modest landscape value and low landscape sensitivity, indicating that the development including the identified WWTP campus have a low sensitivity to development, notwithstanding the underlying greenbelt zoning. The greenbelt zoning is not to afford protection to the landscape in this location as a consequence of visual sensitivity.

### ***Elaboration of the policy and vision supporting the Greenbelt zoning.***

#### ***Sustainable Development***

28. The proposed development is for a strategic infrastructural development. As was previously stated in the Chief Executive's report of September 2018, the proposed development, through facilitating waste-water services for the region will ensure planned development of appropriately zoned residential and commercial development lands. Objectives supporting the greenbelt through intensive redevelopment of existing urban areas and other zoned lands cannot be achieved without the development of the strategic infrastructure of the Greater Dublin Drainage Project and as such, the proposal, including the WWTP campus is required to support local, regional and national policy in this regard.

#### ***Visual and natural amenities of the countryside***

29. It is considered that the proposed layout through provision of a spatially appropriate layout and use of a bermed and planted design response on the northern, western and eastern boundaries, would protect the low lying character type of this part of the greenbelt. The width of the site on the east-west axis, along with the spacing of structures, combined with the sloped nature of the landscape treatment would interface appropriately with a rural landscape of low landscape sensitivity in the medium to longer term. It is further considered that having regard to the HT zoning to the south, that the rural character of the area would only be appreciated by citizens from roads and limited dwellings to the north, west and east and that this character as demonstrated above, would not be unduly impacted due to the design mitigation measures set out above. The visual benefits of the greenbelt are specifically identified for resident citizens, not for users of commercial enterprises such as those located on HT zoned lands.



## ***Coalescence***

30. As was identified previously, there is a significant area of Greenbelt zoned lands in Fingal, all of which are located in the southern part of the county. The greenbelt aim is to underpin the settlement strategy for the County and avoid existing urban areas do not coalesce. This has been successful in ensuring that towns within the south eastern part of the County maintain distinct identities. The Greenbelt zoning has ensured that Baldoyle, Portmarnock, Malahide and Swords have remained physically distinct. It is further noted that the greenbelt between the southern fringe of Fingal at Clonsaugh and Belcamp is 2.7km from Swords Town, 4km from Portmarnock Village and 3.8km from Malahide. It is not considered that use of part of the Greenbelt for a strategic infrastructural development on land at this particular location would represent a significant encroachment on the greenbelt such that it would result in closer coalescence of the south fringe with the towns to the north and east which the greenbelt seeks to separate. Furthermore, to repeat the assessment in the Chief Executive's report, the waste-water treatment plant forms a bookend to development of this part of the south-fringe and due to the nature and requirement for buffer areas around the facility, would preclude further intensive development to the north, aiding in the permanent status of this part of the Greenbelt.

## ***Need for location***

31. The location of the WWTP in Clonsaugh is set out in pages (p270 – 271) of the Development Plan.
32. The proposed development, including a waste water treatment plant campus within Clonsaugh, is part of a strategic project to provide adequate waste water facilities for the future growth of south and west Fingal, Dublin City, Kildare and Meath, in addition to creating capacity for growth of South Dublin. Having regard to the statement contained in pages 270–271, the principle of the location at Clonsaugh is acceptable and supported by the Development Plan.
33. Further, a waste-water treatment plant of 500,000 PE has a requirement for a large land take.
34. A buffer to existing and proposed sensitive development is also required. This would omit locations in close proximity to existing or proposed residential development, in addition to sensitive uses insofar as possible. The strategic infrastructure development will also facilitate the appropriate and sustainable development of existing zoned lands as set out in the 2017 – 2023 Development Plan, including HT zoned lands to the south and which are zoned in accordance with the development strategy of the County. Use of the whole of the HT zoned lands, which are a high







## **Development Contributions**

36. FCC seeks the application by An Bord Pleanála of the Development Contribution scheme in a proportionate, focused and particularised manner.

### ***Special Contribution***

37. Condition 7 of the part of FCC's Chief Executive's report relating to the Regional Biosolids Storage Facility requested the payment of a special contribution pursuant to section 48(2)(c) of the Planning and Development Act 2000 (as amended) in respect of the upgrade and signalisation of the R135 and the N2 North Bound Slip priority junction.
38. It is noted that the ministerial "Development Contributions" guidelines for planning authorities (January 2013) provides *inter alia* that "[a] special development contribution may be imposed under section 48(2)(c) where specific exceptional costs, which are not covered by the general contribution scheme, are incurred by a local authority in the provision of public infrastructure or facilities which benefit very specific requirements for the proposed development, such as a new road junction or the relocation of piped services. The particular works should be specified in the condition. Only developments that will benefit from the public infrastructure or facility in question should be liable to pay the development contribution.
39. In seeking this special condition pursuant to section 48(2)(c) of the PDA 2000, FCC refers to the fact that the R135 and the N2 north bound slip priority junction requires upgrade to signalisation to improve capacity for the proposed development.
40. The analysis presented as part of the Greater Dublin Drainage Project indicates that there will be a traffic impact on part of the junction of the M2 / R135 as a result of the development, and that junction is considered a critical piece of infrastructure in providing access to the GDD facility. Accordingly, FCC considers it appropriate that either mitigation measures at that junction, or a proportionate financial contribution of same, should be included as part of any future grant of permission for the Greater Dublin Drainage Project.

### ***The Development Contribution Scheme***

41. Condition 19 of the FCC Chief Executive's report requested the payment of development contributions under Section 48 of the Planning and Development Act 2000 (as amended).
42. The 2016-2020 Development Contributions Scheme sets out the basis for determination of a contribution:-



(a) The amount of the costs which are attributable, in the years to 2020 to the three classes of public infrastructure and facilities (listed in the table at Article 9 of the scheme).

(b) The aggregated floor areas in square metres of projected development, in the years to 2020, in each of the classes or descriptions of development, namely, residential class and industrial/commercial class. These floor areas are given in Table B of Appendix I which is annexed to this Scheme.

(c) The development contributions payable per square metre of residential development, and of industrial/commercial development were determined upon consideration of a number of factors including:

- Eligible costs of projects
- Expected quantum of development
- The level of existing contribution rates

From review of the Development Contributions Scheme it is considered that certain exemptions and reductions apply which is set out in sections (j) and (l) of the scheme. Other exemptions as set out in the scheme would not appear to apply.

43. Accordingly, FCC requests that the Board consider the proportionate application of the Development Contribution Scheme in this instance to any office building within the waste-water treatment plant (500sqm floor area) and the administrative building within the RBSF (110sqm floor area). This also complies with the Draft Water Services Guidelines for Planning Authorities (January 2018) which recommends levies on administrative buildings only.

### ***Community Gain***

44. Irish Water have submitted within the January 2019 response that the project contains a number of community gain outcomes. It is noted that these were assessed under Section 10 of the FCC Chief Executive's Report. This noted five separate items raised by the applicant. These include use of new entrant employees; benefits to SME's from proposed project; social procurement to identify employment and training opportunities; provision of a wastewater education zone; guided tours.
45. The Community Benefits Scheme as submitted by Irish Water is considered to be positive but appears to have limited scope relating to community based activities and sponsorships.



46. The précis of evidence by Mr. Dan O'Boyle on 'Consultation' to the oral hearing on 20<sup>th</sup> March 2019 makes reference to 'supports for local projects that seek to enhance or protect the local built or natural environment'.
47. Further clarity on the operation and scope of this scheme would be welcomed. Consideration, for example, for funding for local water conservation and improvement projects at community level, community gardens or generation of biodiversity habitats in existing areas could aid in achieving objectives relating to the UNESCO Biosphere.

**Community Gain - Permeability Link – Connolly Hospital/National Sport Campus**

48. Condition 17 of the Chief Executive's Report regarding the GDD Project requested:-

*The developer shall liaise with the HSE to provide for a cinder type public path above the pipeline route between chainage 0+500 and 0+700 within the grounds of Connolly Hospital in order to ensure public access to the NSC. Prior to the commencement of development, the developer shall agree any required works in writing with the Planning Authority and all works shall be implemented prior to the completion of the Abbotstown Pumping Station.*

**Reason:** *To achieve the aims of Local Objective 116 and provide for increased amenity in the wider area.*

49. The principle of this proposal has been accepted by Irish Water and the HSE.
50. The HSE's proposed redevelopment of part of the campus- Unit 8 for a high dependency nursing home would provide a greater degree of passive observation. It is considered that the opportunity exists to provide for a path and gate in the location indicated in condition 17. It is considered in that a design for a path, with associated railings, gate and lighting would deliver local objective 116 of the Fingal Development Plan. Omission of the requirement for provision of a path and associated ancillary elements by way of condition will reduce the effective ability of FCC to implement the local objective for greater permeability in this location into the short to medium term.
51. It is recommended, in the event of a positive decision on the proposed development, that the proposed condition be reworded to state:

*The developer shall provide for a tarmacadam pedestrian path above the pipeline route between chainage 0+500 and 0+700 within the grounds of Connolly Hospital in order to facilitate future public access to the National Sport Campus in compliance with Local Objective 116. A gate shall be provided at the intersection of the path with the boundary of the NSC and Connolly Hospital.*



***Reason:*** *To achieve the aims of Local Objective 116 and provide for increased amenity in the wider area.*

### **Improved Permeability**

52. An Bord Pleanála has sought further comment on whether improved permeability through or at the site edge is warranted. The proposed Waste-Water Treatment Plant will eventually be abutted to the south by development of the High Technology zoned lands. The southern boundary of the WWTP will be formed by the future east-west distributor road which will also interface with the HT zoned lands to the south. It is considered by the Planning Authority that the WWTP will form a northernmost book-end to development to the south. It is not envisaged that further development will be facilitated to the north, such that vehicular permeability through the site would be required. It is noted that no footpath or cycle lane is proposed to the WWTP along the current access route. In the interest of permeability it is considered that a footpath should be provided.

53. Furthermore, it is suggested that An Bord Pleanála attach a condition requiring the precise layout of the 10 construction compounds be agreed with FCC.

### **Water Quality**

(John Daly, Senior Engineer: Environment Department )

#### ***Bathing Water***

54. The response of Irish Water to An Bord Pleanála regarding bathing water quality is noted. In this regard, section 404 – 412 and associated diagrams 8.1 – 8.10 adequately demonstrate that water quality at Velvet Strand and Claremont Breach designated bathing areas would maintain 'excellent' water quality. Further to this, use of UV tertiary treatment as set out by Irish Water at the outset of the oral hearing will further ensure maintenance of excellent water quality.

#### ***Shellfish Waters***

55. The response of Irish Water to An Bord Pleanála regarding water quality impact on shellfish is noted. Sections 362 – 370 set out the applicants response to matters relating to the effect of water quality on designated shellfish waters under the Shellfish Directive. Schedule 4 of S.I. no 268/2006 sets a guide value for coliform concentrations equal to or less than 300 faecal coliforms per 100 millilitres in the shellfish flesh and intervalvular liquid. It is also recognised that the Malahide Shellfishery has a Class A classification requiring that samples of the live bivalve molluscs from these areas must not exceed 230 E. coli per 100g of flesh and intravalvular liquid. Having regard to the proposed upgrade to the wastewater treatment plant to provide for UV tertiary treatment, it is considered that matters of



water quality regarding impact on shellfish are resolved to the satisfaction of Fingal County Council.

### **Noise - Connolly Hospital**

(Louise McIntyre, Environmental Health Officer)

56. With regard to the Irish Water submission in relation to noise, the matters have been reviewed by the Environmental Health Officer. Comments received relate to the following:-

- That the timely investigation of complaints as set out in paragraph 698 shall be more clearly defined, particularly with regard to the hospital and hospice. The applicant should provide clarity on this matter.
- That noise and vibration monitoring as set out in paragraph 705 shall be carried out no greater than 1m from the nearest noise sensitive locations.

57. The EHO's concerns remain regarding use of the closure of windows within the west wing of Connolly Hospital and St. Francis Hospice as a noise mitigation measure. No indication has been provided regarding temperature regulation/air conditioning within these buildings. This should be clarified.

58. The EHO recommends that rock breaking and piling should only be carried out during standard construction hours in order to allow hospital and hospice patients respite. It is acknowledged that this will increase the length of the construction project in this area.

59. Regarding paragraph 709 it is agreed that all residents and businesses likely to be effected by these works shall be notified in writing and made aware of the dates and duration of such works prior to commencement of the works. Contact details for the Irish Water point of contact for complaints should be attached.

60. It is recommended that condition 13 be retained in full in this regard.

### **Hedgerow and trees**

(Mark Finnegan, Parks Department)

61. FCC is of the view that the excessive removal of trees and hedgerows should be avoided. The applicant has indicated in section 12.4.2 of the January 2019 submission that approximately 20m of any hedgerow would be removed with hedgerows to be replanted. Mention is also made of retention of removed hedgerow to be replanted and protection of tree roots. FCC have previously expressed concerns regarding the lack of specific detail on tree and hedgerow removal, with reference to mature trees and townland boundaries. These have not

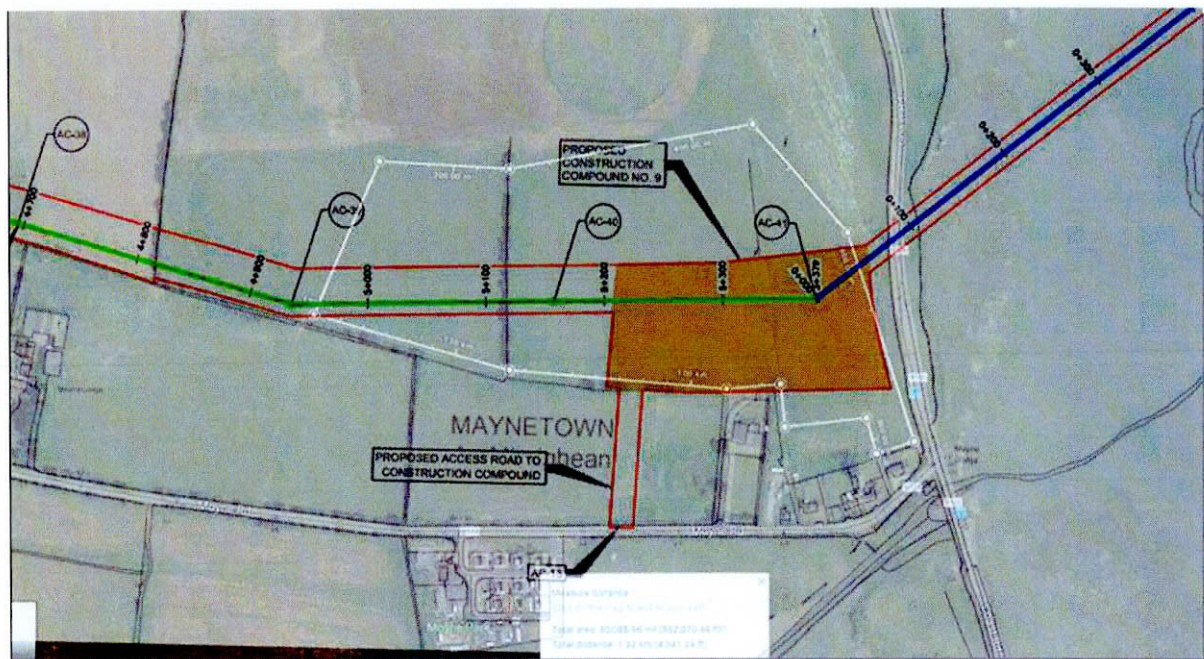


been fully responded to. A tree survey of the whole of the route, employment of an arborist, agreement on tree protection measures prior to the commencement of development and measures to ensure removal of townland boundaries is restricted to no more than 10m unless with the written permission of the Planning Authority is recommended. Measures regarding impact on bats from the proposed WWTP lighting are considered acceptable.

## **Biodiversity – Compound 9 and 10**

(Hans Visser, Biodiversity Officer)

62. The National Parks and Wildlife Service submission raised the issue of use of 20% of a designated feeding area associated with the Portmarnock South Local Area Plan by temporary construction compound 9. The submission also references the recent grant of permission for a Strategic Housing Development under ref. ABP-300514-17 and the location of other feeding areas and the phasing of the development of the pipeline and housing which may further impact on the feeding area.



*Figure 2 – Location of temporary construction compound 9.*

63. The 'Bird Quiet Zone' was a requirement of the Portmarnock South Local Area Plan. Section 5.2.1 of the LAP indicates that bird surveys undertaken in 2012 found the plan lands as an important habitat for migratory birdlife associated with Baldoyle Bay. The LAP set out the creation of an ecological buffer zone to mitigate against the loss of the greenfield farmland to housing. The measures required within the buffer zone are set out in Table 5.0 of the LAP and include a quiet zone to cater for Brent



Geese and wader species, to consist of grassland pasture, fenced and hedged. Retention of the Murragh Spit to the east of the Coast Road also formed a part of the habitat protection measures set out in Table 5.0. Arable crop areas suitable for migratory and native birds are provided for as are significant meadow areas. These lands have been transferred to FCC and form a significant part of the ecological buffer area.



Figure 3 – Extract from Portmarnock South LAP – indicating quiet feeding area

64. It is further noted by FCC, that the area in question is approximately 8ha in area, with a north-south hedgerow dividing the land. The part of the land to be occupied by the temporary construction compound is within the south-eastern section of the quiet area, and is proximate to existing houses. The transfer of the relevant area of land was required as a condition of planning permission for 101 houses under F13A/0248. It is also noted by the FCC Biodiversity Officer that the area, which was received into Local Authority ownership in early 2018 and is since late 2018 under land management through grazing to provide an appropriate grassland regime.





Figure 4 – measurement of area at 8.009ha (approx)

65. Figure 4 indicates the overall area of the Bird Quiet Zone (BQZ). It should be noted that at the same time as works were being undertaken to the BQZ, additional clearing works were undertaken to lands in the Murragh under licence from the NPWS. These lands can also facilitate feeding to migratory species from March 2019 onwards – see figure 5.



Figure 5 – additional lands in The Murragh under management by FCC – 0.88ha approx.



## **Compound 10**

66. It is considered that the response as submitted in January 2019 is not sufficiently strong in terms of confirming re-instatement of compound 10. It should be noted that FCC wish to see compound 10 restored to dune habitat upon completion of use of the compound for the GDD Project.



## **Appendix A**

### *Fingal County Council*

**Colm McCoy – Senior Planner** – Planning and Strategic Infrastructure Department, Development Management and Forward Planning.

Experience – over 19 years as a qualified Town Planner.

Qualifications – BSc (Hons) Environmental Planning, Post Graduate Diploma in Town and Country Planning. MIPI

**John Daly - Senior Engineer** - Water Services and Environment Department, Environment Section.

Experience – over 31 years as a qualified Engineer, of which over 27 years is in Water Services and Environment.

Qualifications – BSc Engineering (Civil), MSc Environmental Engineering.

**David Murray - Senior Executive Planner** – Planning and Strategic Infrastructure Department, Development Management and Forward Planning.

Experience – over 15 years as a qualified Town Planner.

Qualifications – BSc (Hons) Town Planning (D.I.T), Dip (Hons) Env. Resources Management (D.I.T). MIPI.

**Niall Thornton - Executive Engineer** – Planning and Strategic Infrastructure Department, Roads, Planning and Planning Control Section.

**Hans Visser – Biodiversity Officer** - Planning and Strategic Infrastructure Department, Parks Planning Section.

Experience – over 17 years with FCC as a Parks Superintendent and Biodiversity Officer.

Qualifications- BSc Landscape and Nature Engineering, MSc Environmental Sciences.

**Mark Finnegan – Executive Parks Superintendent** - Planning and Strategic Infrastructure Department, Parks Planning Section.

Experience – over 10 years as a qualified Landscape Architect.



Qualifications- Dip. Amenity Horticulture, BA (Hons) Landscape Management, MA Landscape Architecture.

*\*External Consultants*

**\*Aebhin Cawley – Director - Scott Cawley**

Experience – over 16 years as a qualified ecologist.

Qualifications- BA (Hons) Zoology (TCD), Postgraduate Diploma in Physical Planning (TCD), Chartered Environmentalist since 2005, Full member of the Chartered Institute of Ecology and Environmental Management (CIEEM)

**\*Separate document, Aebhin Cawley**



