

BALLYMASTONE LRD PHASE 3

ENVIRONMENTAL IMPACT ASSESSMENT

REPORT (EIAR) ADDENDUM

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Client: Glenveagh Living Limited

Date: 05 June 2026

DOCUMENT CONTROL SHEET

6884_RP04_Environmental Impact Assessment Report (EIAR) Addendum

Project No. 6884
Client: Glenveagh Living Limited
Project Name: Ballymastone LRD Phase 3
Report Name: Environmental Impact Assessment Report (EIAR) Addendum
Document No. RP04
Issue No. 03
Date: 05/06/2026

This document has been issued and amended as follows:

Issue	Status	Date	Prepared	Checked
01	Draft	28 May 2026	NC; Various	TB
02	Issued	05 Jun 2026	NC; Various	TB



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Non- Technical Summary - Addendum

Other than updating the description of the Proposed Development in **Section 1.1 The Proposed Development** to the following, and where this description is noted elsewhere in the document (not repeated here), there is no change to assessments or findings presented in the Non-technical Summary of the EIAR.

1.1 The Proposed Development

The Proposed Development will consist of the construction of a residential development, which represents Phase 3 of the wider development of the Ballymastone Lands, ranging in height from 2- to 6-storeys, to accommodate 433 no. residential dwellings (including a mix of apartments, duplexes and houses), private amenity space, a crèche (c. 567sq.m), and a community space (c. 216sq.m). The site will accommodate 323 no. car parking spaces in total (comprised of 296 no. residential spaces, 9 no. spaces for the crèche, 1 no. accessible EV space, 2 no. standard (ducted) accessible spaces, 5 no. standard EV spaces, and 10 no. standard (ducted) spaces), 1,472 total no. bicycle parking spaces, new pedestrian/cycle links, road improvements, storage, services (including water, wastewater, electricity and telecommunications) and plant areas. Landscaping will include communal amenity areas, significant public open space (c. 17% of the overall site), and SuDS features.

The Applicant is Glenveagh Living Limited.

The following is provided as an overview of where chapters of the main EIAR remain unchanged or have been updated.

EIAR Chapter	Status in this Addendum	Commentary
Chapter 1: Introduction	Unchanged	No material change arising. The original chapter remains valid.
Chapter 2: EIA Process	Unchanged	No material change to assessment methodology. The original approach remains valid.
Chapter 3: Planning & Policy Context	Unchanged	No material change to the relevant policy framework since October 2025.
Chapter 4: Consideration of Alternatives	Unchanged	No material change arising. The alternatives assessment remains valid.
Chapter 5: Description of the Proposed Development	Updated	The description of the Proposed Development has been revised to reflect the amendments arising from the RFI.
Chapter 6: Consultation	Unchanged	No material change arising. No additional consultation relevant to the EIAR has been undertaken since submission of the original EIAR. The original chapter remains valid.



EIAR Chapter	Status in this Addendum	Commentary
Chapter 7: Population & Human Health	Updated	Updated to reflect design changes and passage of time, including revised population and community provision. No change to the overall assessment of significance of impacts from the original EIAR submission.
Chapter 8: Biodiversity	Unchanged	No material change arising from the revised Proposed Development. No change to the overall assessment of significance of impacts from the original EIAR submission.
Chapter 9: Land, Soils, Geology & Hydrogeology	Unchanged	No material change arising from the revised Proposed Development. No change to the overall assessment of significance of impacts from the original EIAR submission.
Chapter 10: Hydrology	Unchanged	No material change arising. The original assessment remains valid. No change to the overall assessment of significance of impacts from the original EIAR submission.
Chapter 11: Air Quality	Unchanged	No material change arising, having regard to revisions in traffic and population levels. No change to the overall assessment of significance of impacts from the original EIAR submission.
Chapter 12: Climate	Unchanged	No material change arising from the revised Proposed Development. No change to the overall assessment of significance of impacts from the original EIAR submission.
Chapter 13: Noise & Vibration	Updated	Updated to address RFI requirements relating to glazing, ventilation and internal noise standards. No change to the overall assessment of significance of impacts from the original EIAR submission.
Chapter 14: Landscape & Visual	Updated	Updated to address RFI requirements including ACA impacts and mitigation measures. No change to the overall assessment of significance of impacts from the original EIAR submission.
Chapter 15: Cultural Heritage, Archaeology & Architectural Heritage	Updated	Updated to address RFI requirements relating to ACA and associated policy compliance. No change to the overall assessment of significance of impacts from the original EIAR submission.
Chapter 16: Microclimate (Daylight & Sunlight)	Updated	Updated to provide further assessment of impacts, mitigation and residual effects. No change to the overall assessment of significance of impacts from the original EIAR submission.
Chapter 17: Microclimate (Wind)	Unchanged	No material change arising from the revised building configuration.



EIAR Chapter	Status in this Addendum	Commentary
Chapter 18: Traffic & Transportation	Updated	Updated to address RFI requirements, including construction traffic assessment and trip generation. No change to the overall assessment of significance of impacts from the original EIAR submission.
Chapter 19: Material Assets (Waste)	Updated	Updated to address deficiencies identified in the OWMP (Appendix 19.2). No change to the overall assessment of significance of impacts from the original EIAR submission.
Chapter 20: Material Assets (Services)	Unchanged	No material change arising from the revised Proposed Development. The original assessment remains valid. No change to the overall assessment of significance of impacts from the original EIAR submission.
Chapter 21: Interactions	Updated	Updated where relevant.
Chapter 22: Cumulative Impacts	Updated	Updated to account for additional permitted and Proposed Developments since October 2025.
Chapter 23: Mitigation & Monitoring	Updated	Updated where relevant.



Introduction

This Environmental Impact Assessment Report (EIAR) Addendum has been prepared for Ballymastone Phase 3 development (Reg. Ref. LRD0053/S3) in Donabate, Co. Dublin ('the Proposed Development'). It was prepared in accordance with the provisions of the Planning and Development Act 2000, as amended ('PDA 2000'), the Planning and Development Regulations 2001, as amended ('PDR 2001') and the relevant guidance documents, as detailed herein. This Addendum should be read in conjunction with the EIAR submitted with the planning application on 23 October 2025.

1.1 Need for Addendum

Fingal County Council (FCC) issued a Request for Further Information (RFI) on 17 December 2025. The RFI relates to a range of matters including Planning, Open Space, Landscape, Biodiversity, Transportation, Waste Management, Noise and Archaeology.

In responding to the RFI, a number of design modifications and updates to the Proposed Development have been incorporated. Most notably, these include an increase in residential unit numbers (from 398 no. to 433 no. units), revisions to the provision of community and childcare facilities, changes to car and bicycle parking provision, and updates to landscaping and public open space, including the integration of SuDS features and reconfiguration of amenity space. These changes have been developed having regard to the issues raised by the Planning Authority and consultees and are intended to enhance the overall environmental performance and functionality of the scheme.

In responding to the RFI, it is also necessary to address, clarify and/or provide updated assessment of aspects of the Environmental Impact Assessment Report (EIAR), particularly in relation to landscape, noise, cultural heritage, traffic and transportation, daylight/sunlight and material assets.

It is considered that the proposed changes, which includes an increase in residential density and associated adjustments to the development parameters, are either neutral or positive in environmental terms. Where relevant, the changes have been assessed in terms of their potential to alter previously identified environmental effects. In general, the amendments do not give rise to any new or significant adverse impacts and do not change the assessments or findings in the original EIAR. In some cases, the proposed changes result in improved outcomes, particularly in relation to green infrastructure provision, community facilities, and in the provision of additional residential units.

Notwithstanding the overall positive or neutral nature of the amendments, this Addendum to the EIAR has been prepared to document the revisions to the Proposed Development, to provide the additional information required by the RFI, and to update the original environmental assessments where necessary.

This document (hereafter referred to as the 'EIAR Addendum') sets out the additional information, clarifications, and revised assessments required to address the RFI. It should be read in conjunction with, and as a supplement to, the Environmental Impact Assessment Report submitted with the original planning application (Reg. Ref. LRD0053/S3).

1.2 The Proposed Development

1.2.1 Site of the Proposed Development

The site of the Proposed Development is unchanged; however, it is described briefly below to provide context to the reader.

The Proposed Development site, which extends to approximately 11.28 hectares, is located in the coastal town of Donabate, approximately 20 km north-east of Dublin City Centre and c. 10 km north-east of Dublin Airport, within the administrative area of Fingal County Council. The site is situated in the townlands of Ballalease North, Portrairie Demesne and Ballymastone (refer to **Figure 1.1**).

The site is located on the eastern edge of Donabate and is predominantly comprised of greenfield lands, formerly in agricultural use, characterised by a network of hedgerows and drainage ditches. A portion of the lands is currently in use as a construction compound and car park associated with the permitted Ballymastone Phase 2 development (FCC Ref. LRD0039/S3; ABP Ref. 320885), while the remainder of the site is undeveloped.

The site forms part of the wider Ballymastone lands and is bounded by existing and permitted residential development. To the immediate south lies Ballymastone Phase 2 (FCC Ref. LRD0039/S3; ABP Ref. 320885), permitted in January 2025, and Ballymastone Phase 1 (FCC Ref. LRD0008/S3; ABP Ref. 315288), permitted in March 2023, which together comprise substantial residential development and associated infrastructure. The site is further bounded to the east by the Donabate Distributor Road (DDR) and the approved Recreational Hub (Part 8), and to the west and north by established residential areas including The Links, Priory Wood and Willowbrook, as well as Donabate Burial Grounds to the north-west.

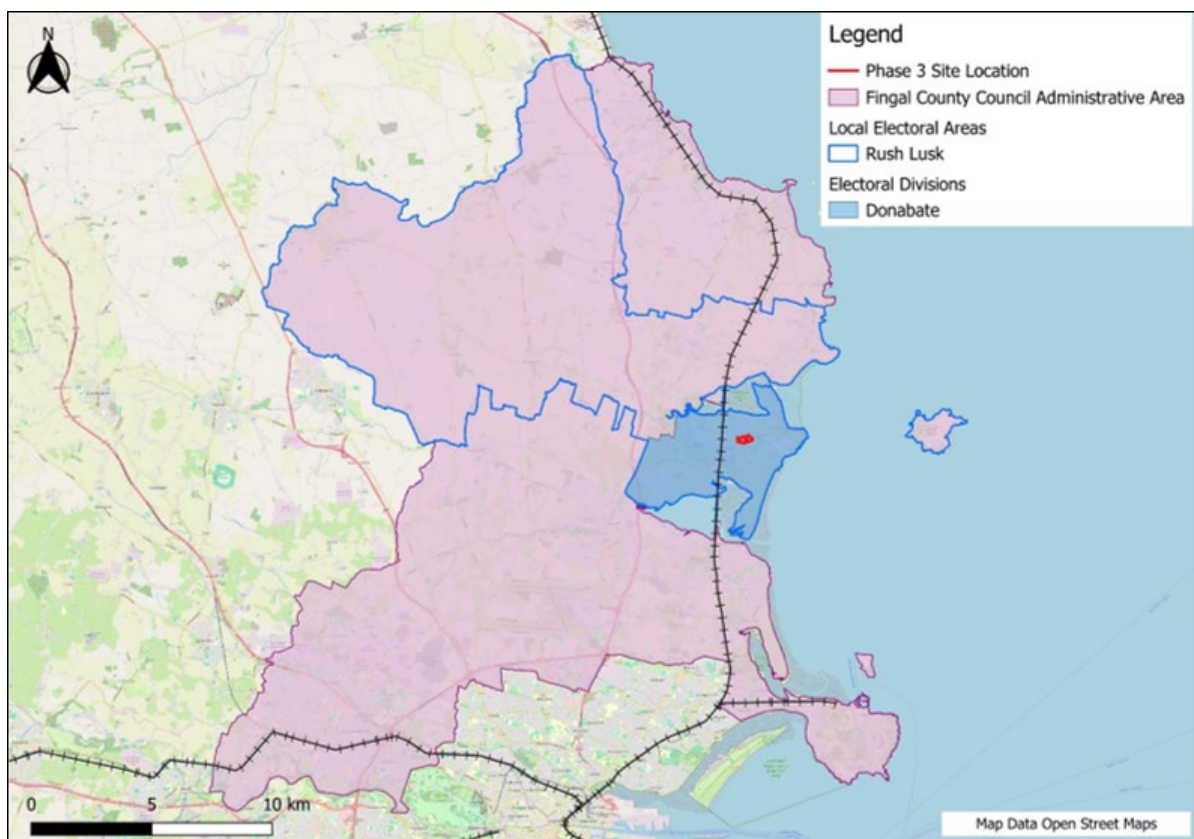


Figure 1.1 Site context of the Proposed Development.

1.2.2 Original Submission

A summary of the Proposed Development, as originally submitted with the planning application in October 2025, is set out below to provide context for the reader.

In summary, the Proposed Development will consist of the construction of a residential development, which represents Phase 3 of the wider development of the Ballymastone Lands, ranging in height from 2- to 6-storeys, to accommodate 398 no. residential dwellings (including a mix of apartments, duplexes and houses), private amenity space, a crèche (c. 646sq.m), and a community space (c. 100sq.m). The site will accommodate 316 no. car parking spaces in total (comprised of 288 no. residential spaces, 10 no. spaces for the proposed crèche/community space, 6 no. EV charging spaces including accessible spaces, and 12 no. spaces ducted for future provision), 1,619 total no. bicycle parking spaces, new pedestrian/cycle links, road improvements, storage, services (including water, wastewater, electricity and telecommunications) and plant areas. Landscaping will include communal amenity areas, SuDS features, and significant public open space (c. 15.3% of the net site) including outdoor exercise and play equipment.

Refer to Section 1.2.4 and **Table 1.1** summarising key changes in the revised proposal.

1.2.3 Revised Submission (in response to RFI)

The following description of the Proposed Development has been updated to include relevant revisions arising from the request for additional information:

In summary, the Proposed Development will consist of the construction of a residential development, which represents Phase 3 of the wider development of the Ballymastone Lands, ranging in height from 2- to 6-storeys, to accommodate 433 no. residential dwellings (including a mix of apartments, duplexes and houses), private amenity space, a crèche (c. 567sq.m), and a community space (c. 216sq.m). The site will accommodate 323 no. car parking spaces in total (comprised of 296 no. residential spaces, 9 no. spaces for the crèche/community hall, 1 no. accessible EV space, 2 no. standard (ducted) accessible spaces, 5 no. standard EV spaces, and 10 no. standard (ducted) spaces), 1,472 total no. bicycle parking spaces, new pedestrian/cycle links, road improvements, storage, services (including water, wastewater, electricity and telecommunications) and plant areas. Landscaping will include communal amenity areas, significant public open space (c. 17% of the overall site), and SuDS features.

Refer to Section 1.2.4 and **Table 1.1** summarising key changes in the revised proposal.

1.2.4 Key Changes Proposed

The following is a summary of the key design changes incorporated in the Proposed Development as a result of responding to the RFI:

- Increase in total number of residential units from 398 to 433 (an increase of 35 units).
- Reduction in crèche floor area from approximately 646 sq.m to approximately 567 sq.m.
- Increase in community space from approximately 100 sq.m to approximately 216 sq.m.
- Increase in total car parking provision from 316 spaces to 323 spaces (an additional 7 spaces).
- Increase in residential parking from 288 spaces to 296 spaces.
- Crèche/community hall parking now as 9 spaces.
- Introduction of a more detailed EV parking breakdown, including:

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- ❑ 1 accessible EV space
- ❑ 2 standard accessible (ducted) spaces
- ❑ 5 standard EV spaces
- ❑ 10 standard (ducted) spaces
- Reduction in bicycle parking provision from 1,619 spaces to 1,472 spaces (a decrease of 147 spaces).
- Increase in public open space provision from approximately 15.3% to approximately 17% of the overall site.

There is no change to building heights (remains 2- to 6-storeys) or overall unit mix. Likewise, there are no material changes to pedestrian and cycle links, road improvements, services (water, wastewater, electricity and telecommunications), storage, plant areas, or inclusion of sustainable drainage (SuDS) features.

Table 1.1 Summary of key changes in the revised proposal.

Category	Original Proposal	Revised Proposal	Change
Residential Units	398 units	433 units	+35 units
Building Height	2- to 6-storeys	2- to 6-storeys	No change
Unit Typology	Apartments, duplexes, houses	Apartments, duplexes, houses	No change
Crèche Size	c. 646 sq.m	c. 567 sq.m	Decrease of ~79 sq.m
Community Space	c. 100 sq.m	c. 216 sq.m	Increase of ~116 sq.m
Total Car Parking	316 spaces	323 spaces	+7 spaces
Residential Parking	288 spaces	296 spaces	+8 spaces
Crèche/Community Parking	10 shared spaces	9 shared spaces	Reconfigured
EV Charging Spaces	6 (incl. accessible)	1 accessible EV + 5 standard EV	No change
Ducted Spaces	12 spaces	10 standard (ducted) + 2 accessible (ducted)	No change
Bicycle Parking	1,619 spaces	1,472 spaces	-147 spaces
Public Open Space	c. 15.3% (net site)	c. 17% (overall site)	Increase

1.3 Summary of RFI Matters Addressed in this EIAR Addendum

In addition to the design changes to the overall development, the further information (FI) also requested further assessment and / or information in relation to the EIAR submitted with the application. Therefore, in order to provide a comprehensive response to the FI request, this Addendum to the EIAR considers the likely significant effects, if any, of the proposed changes and also responds directly to specific requests under Section 3 (a-f) and Section 4 (a-f) of the RFI document. The additional information requested in the RFI, applicable to the EIAR addendum, is summarised in **Table 1.2** below.

Table 1.2 Summary of RFI Items Relevant to the EIAR

<i>RFI Ref.</i>	<i>Summary of RFI Request</i>	<i>EIAR Addendum Reference</i>
3a	Clarification of total hedgerow removal, including extent (m)	<i>Chapter 8 Biodiversity</i> (refers to the Landscape Strategy Submission and drawings prepared by CSR Landscape Architects)
3b	Assessment of impacts on woodland (WD1), including undergrowth removal	<i>Chapter 8 Biodiversity</i> (refers to the Landscape Strategy Submission and drawings prepared by CSR Landscape Architects)
3c	Clarification regarding fauna movement (e.g. hedgehogs) and boundary fencing	<i>Chapter 8 Biodiversity</i>
3d	Clarification of dark corridor provision adjacent to woodland	<i>Chapter 8 Biodiversity</i>
3e	Clarification regarding replacement of removed hedgerow	<i>Chapter 8 Biodiversity</i> (refers to the Landscape Strategy Submission and drawings prepared by CSR Landscape Architects)
3f	Detail on native planting, species composition and distribution	<i>Chapter 8 Biodiversity</i> (refers to the Landscape Strategy Submission and drawings prepared by CSR Landscape Architects)
4a	Updated LVIA including ACA impacts, mitigation, cumulative effects	<i>Chapter 14 Landscape & Visual</i>
4b	Updated assessment of ACA impacts and policy compliance	<i>Chapter 15 Cultural Heritage</i>
4c	Clarification of impacts, mitigation and residual effects for non-compliant units	<i>Chapter 16 Daylight/Sunlight</i>
4d	Updated construction traffic assessment, including HGVs and workforce trips	<i>Chapter 18 Traffic & Transportation</i>
4e	Review of glazing/ventilation to demonstrate compliance with BS8233:2014	<i>Chapter 13 Noise & Vibration</i>
4f	Revised OWMP, including unit breakdown and waste storage details	<i>Chapter 19 Material Assets – Waste</i>

1.4 Scope of this EIAR Addendum

This EIAR Addendum has been prepared to address the Request for Further Information and to document revisions to the Proposed Development. It focuses on those environmental topics where additional information, clarification or reassessment is required.

For completeness, **Table 1.3** below sets out the status of each chapter of the original EIAR, identifying those which are updated in this Addendum and those which remain unchanged.

Table 1.3 Status of EIAR Chapters

EIAR Chapter	Status in this Addendum
<i>Chapter 1: Introduction</i>	Unchanged
<i>Chapter 2: EIA Process</i>	Unchanged
<i>Chapter 3: Planning & Policy Context</i>	Unchanged
<i>Chapter 4: Consideration of Alternatives</i>	Unchanged
<i>Chapter 5: Description of the Proposed Development</i>	Updated
<i>Chapter 6: Consultation</i>	Unchanged
<i>Chapter 7: Population & Human Health</i>	Updated
<i>Chapter 8: Biodiversity</i>	Unchanged
<i>Chapter 9: Land, Soils, Geology & Hydrogeology</i>	Unchanged
<i>Chapter 10: Hydrology</i>	Unchanged
<i>Chapter 11: Air Quality</i>	Unchanged
<i>Chapter 12: Climate</i>	Unchanged
<i>Chapter 13: Noise & Vibration</i>	Updated
<i>Chapter 14: Landscape & Visual</i>	Updated
<i>Chapter 15: Cultural Heritage, Archaeology & Architectural Heritage</i>	Updated
<i>Chapter 16: Microclimate (Daylight & Sunlight)</i>	Updated
<i>Chapter 17: Microclimate (Wind)</i>	Unchanged
<i>Chapter 18: Traffic & Transportation</i>	Updated
<i>Chapter 19: Material Assets (Waste)</i>	Updated
<i>Chapter 20: Material Assets (Services)</i>	Unchanged
<i>Chapter 21: Interactions</i>	Updated
<i>Chapter 22: Cumulative Impacts</i>	Updated
<i>Chapter 23: Mitigation & Monitoring</i>	Updated

Where chapters are identified as “Unchanged”, the assessments, methodologies and conclusions presented in the original EIAR remain valid and applicable to the Proposed Development, as amended. This EIAR Addendum does not repeat information contained in the original EIAR where it remains valid and unchanged. The original assessments are relied upon except where explicitly updated herein.

Where new or amended text is provided in chapters of the original EIAR this is highlighted in **red** in this Addendum, as are whole chapters where these are also provided in this document.

While no material changes have been identified for the above topics, the potential for indirect and cumulative effects arising from the revised development has been considered. **It is concluded that there is no change to the overall assessment of significance of impacts from the original EIAR submission for any of the updated chapters.**

1.5 Structure of the EIAR Addendum

To ensure consistency and ease of reference with the original EIAR, the chapter numbering used in this Addendum corresponds directly to the chapter numbering of the EIAR submitted with the planning application.

Accordingly, only those chapters requiring update or further assessment are included in this Addendum, and they retain their original chapter numbers. As a result, the chapters contained herein are not presented in sequential order.

This approach facilitates direct comparison with the original EIAR and allows the reader to readily identify the relevant sections which have been updated.

For ease of reference the format and structure of the EIAR Addendum as summarised in **Table 1.4**, below follows the format of the EIAR submitted with the planning application.

Table 1.3 Structure of the EIAR Addendum

Section	Description
Non-Technical Summary	
Chapter 1	Introduction, Need for Addendum and Scope & Format of the Addendum
Chapter 5	Description of the Proposed Development
Chapter 7	Population & Human Health
Chapter 8	Biodiversity
Chapter 9	Land, Soils, Geology & Hydrogeology
Chapter 10	Hydrology
Chapter 11	Air Quality
Chapter 12	Climate
Chapter 13	Noise & Vibration
Chapter 14	Landscape & Visual
Chapter 15	Architectural Heritage
Chapter 16	Microclimate – Daylight & Sunlight
Chapter 17	Microclimate – Wind
Chapter 18	Traffic & Transportation
Chapter 19	Material Assets – Waste
Chapter 20	Material Assets – Services
Chapter 21	Interactions of the Foregoing
Chapter 22	Cumulative Impacts
Chapter 23	Mitigation Measures & Monitoring
Appendices	Updated OWMP (Appendix 19.2)

Chapter 5: Description of the Proposed Development

Scope of the Update

The update relates to the change in the detail of the Proposed Development as set out in Section 5.4.1 and in associated **Figures 5.1, 5.2 and 5.3** of this chapter.

The changes in relation to the Proposed Development are minor in terms of the site layout plan and do not affect the assessments and conclusions of the EIAR. Therefore, updated versions of figures are only provided here in Chapter 5 for clarity, and not elsewhere throughout the EIAR Addendum.

5.4.1 Overview of the Proposed Development

In summary, the Proposed Development will consist of the construction of a residential development, which represents Phase 3 of the wider development of the Ballymastone Lands, ranging in height from 2- to 6-storeys, to accommodate 433 no. residential dwellings (including a mix of apartments, duplexes and houses), private amenity space, a crèche (c. 567sq.m), and a community space (c. 215sq.m). The site will accommodate 323 no. car parking spaces in total (comprised of 296 no. residential spaces, 9 no. spaces for the crèche, 1 no. accessible EV space, 2 no. standard (ducted) accessible spaces, 5 no. standard EV spaces, and 10 no. standard (ducted) spaces), 1,472 total no. bicycle parking spaces, new pedestrian/cycle links, road improvements, storage, services (including water, wastewater, electricity and telecommunications) and plant areas. Landscaping will include communal amenity areas, significant public open space (c. 17% of the overall site), and SuDS features.

The overall site layout for the Proposed Development is shown in **Figures 5.1 to 5.3**, below.

Ballymastone LRD Phase 3
Environmental Impact Assessment Report (EIAR) Addendum

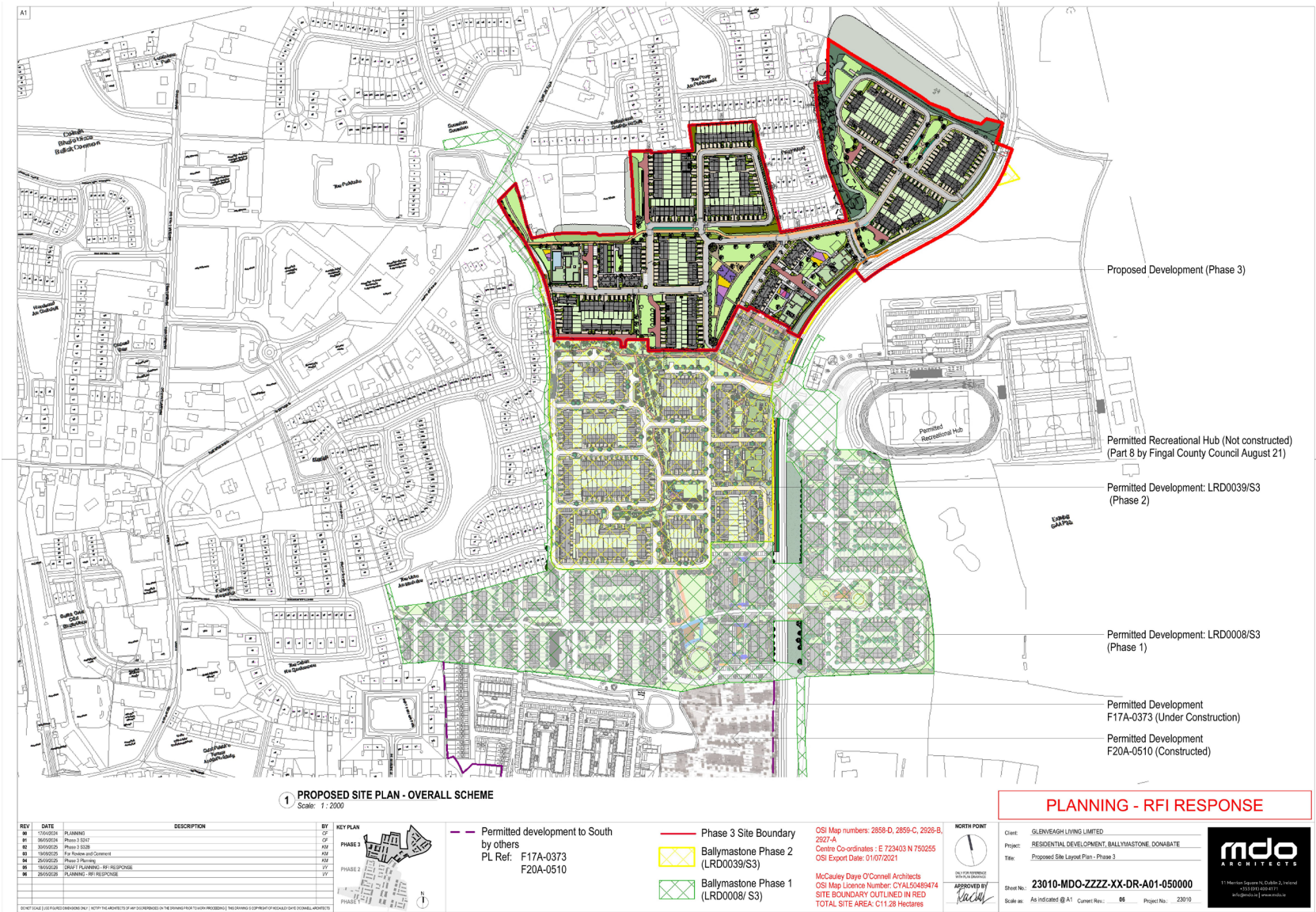


Figure 5.1 Proposed development – site layout (Source: McCauley Daye O’Connell, Updated June 2026)

Ballymastone LRD Phase 3

Environmental Impact Assessment Report (EIAR) Addendum



Figure 5.2 Proposed development – site layout (planning zone 4) (Source: McCauley Daye O’Connell, Updated June 2026)

Ballymastone LRD Phase 3

Environmental Impact Assessment Report (EIAR) Addendum



Figure 5.3 Proposed development – site layout (planning zone 5) (Source: McCauley Daye O’Connell, Updated June 2026)

Chapter 7: Population and Human Health

7.1 Introduction

The assessment of likely significant impacts on population and human health, as presented in Chapter 7 of the EIAR submitted with the original application (October 2025), has been reviewed having regard to the Request for Further Information (RFI) issued by Fingal County Council and the subsequent revisions to the Proposed Development.

While this topic was not specifically identified in the RFI as requiring further assessment, it has been reviewed as part of this EIAR Addendum to reflect both the passage of time and the nature of the proposed revisions.

7.2 Method

No changes to methodologies that would affect the impact assessment.

7.3 Baseline Environment

Updated statistical sources published since October 2025, including recent Labour Force Survey outputs and other relevant datasets, have been reviewed. These represent incremental updates to the baseline environment; however, they do not give rise to any material change in the demographic, socio-economic or health profile of the study area.

There have also been no material changes to the relevant policy framework that would influence the assessment of population and human health.

7.4 Predicted Impacts of the Proposed Developments

7.4.1 Construction Phase

There is no change to the predicted construction phase impacts, which remain as assessed in the original EIAR.

7.4.2 Operational Phase

The revised Proposed Development has been considered in the context of potential effects on population and human health:

Increase in Housing Units

The increase in residential unit numbers represents a marginal uplift (from no. 1124 to 1127) in population associated with the development; however, this increase remains consistent with the planned growth of Donabate as set out in the Fingal Development Plan 2023–2029.

Increase in Public Open Space

The increase in community floor space and enhanced provision of public open space represent positive elements of the revised scheme, supporting community interaction, recreation and general wellbeing. These aspects are considered to contribute positively to human health outcomes.

Change in Creche Size

While the quantum of childcare provision within the site has been reduced, this has been considered in the context of the existing and permitted childcare provision within the wider Donabate area, and the change in unit mix which has resulted in a marginal reduction in the estimated demand for childcare spaces. Having regard to this, it is not considered that the revised childcare provision gives rise to any significant adverse effects.

7.5 Mitigation Measures

There is no change to the mitigation measures for population and human health as provided in the original EIAR.

7.6 Residual Impacts

There is no change to the residual impacts identified in the original EIAR.

The provision of an additional 35 no. residential units represents a positive, although not significant, effect in contributing to housing supply and meeting population demand.

7.7 Indirect and/or Secondary Impacts

There is no change to the assessment of potential indirect and / or secondary impacts for population and human health as provided in the original EIAR.

7.8 Monitoring

There is no change to the monitoring or reinstatement requirements for population and human health as provided in the original EIAR.

7.9 Interactions

There is no change to the assessment of potential interactions for population and human health as provided in the original EIAR.

7.10 Cumulative Impacts

There is no change to the assessment of potential cumulative impacts for population and human health as provided in the original EIAR.

7.11 Difficulties Encountered

There is no change to description of difficulties encountered in compiling the chapter for population and human health as provided in the original EIAR.

7.12 References

No new references materially affecting the assessment have been identified beyond updated statistical datasets (e.g. Labour Force Survey). The references used in the original EIAR remain applicable, including 2022 Census data.

Chapter 8: Biodiversity

The Request for Additional information (Point 4) requests updates/clarifications specifically on matters related to the *Landscape & Visual, Cultural Heritage, Archaeology & Architectural Heritage, Daylight & Sunlight, Traffic & Transportation, Noise & Vibration* and *Material Assets (OWMP)* chapters of the EIAR. It does not refer to the *Biodiversity* chapter.

The Request for Additional information (Point 3) requests the submission of a *revised EIAR and 'Landscape Strategy Submission'* to address points 3(a) to 3(f). These points relate primarily to the landscape design and the findings of the submitted Biodiversity chapter (chapter 8) and the submitted landscape documentation.

The following is provided for clarity in response to RFI items 3(a) to 3(f), however, there is no change to the information, assessments or conclusions presented in Chapter 8 of the EIAR submitted with the application.

Point 3(a): [...] *the total length of hedgerow to be removed as part of clearance works is unclear. The applicant is requested to provide full details of same, including a total figure (in metres) of hedgerow to be removed.*

As confirmed in the revised *Landscape Strategy Submission*, quantities (areas and lengths) hedgerow and bramble to be removed have been added to the vegetation retention and removal plan (refer to CSR drawing 19164-2-3120-Vegetation Retention and Removal). In total, 100 linear metres of existing hedgerow will be removed and 1220m² of bramble will be removed. It is to be noted that 537 linear metres of new hedgerow will be planted, resulting in a net increase in hedgerow within the site of 437 linear metres.

Point 3(b): [...] *The applicant is requested to clarify what woodland the removal of deadwood and bramble undergrowth is associated with, the scale and reasoning for the clearance of undergrowth and to assesses the implications on woodland habitat and fauna.*

As confirmed in the revised *Landscape Strategy Submission*, the applicant welcomes the opportunity to confirm that the text quoted from the Landscape Strategy Submission refers simply to the necessary clearance of only small areas of deadwood and bramble associated with tree group 'G192' and 'W191' shown on the vegetation retention and removal plan (refer to '19164-2-3120-Vegetation Retention and Removal'). In fact, as shown on the drawings prepared by CSR, the vast majority of vegetation in this area is being retained intact (with additional, supplementary planting being provided) and will continue to provide high value to local biodiversity.

The removal of small areas of deadwood and bramble at these two defined locations is required solely to facilitate the creation of useable open space in the Ballalease Woods Park (SP06), and the alignment of the road (as already permitted and under construction as part of Phase 2 development).

The modification of the habitat has been assessed in the EIAR Biodiversity chapter at Section 8.4.2.1 (Habitat Loss and Disturbance) which confirms that in the absence of mitigation, the loss of grassland, scrub and sections of hedgerows and associated habitats is considered to be a permanent, moderate negative impact at a local level. This includes the necessary removal of these small areas of deadwood and bramble. Again, as set out in the Landscape Strategy Submission and drawings, the development will include extensive planting of ecologically diverse habitats within the scheme.

As stated on page 21 of the Landscape Strategy Submission *The existing woodland and large trees (including undergrowth) are to be retained and protected. Along the property boundary with Priory Wood, infill hedgerow planting will create a dense hedgerow, preventing access into the woodland. Along the internal edge of the park, strips of meadow grass will act as a buffer / deterrent to accessing the bramble undergrowth of the vegetation edge.*

The conclusions of the EIAR Biodiversity chapter are unchanged as a result of the response to the request for additional information. In summary there will be no long-term residual impact on biodiversity or on ecological receptors, either within or in the vicinity of the Proposed Development site or associated with any site designated for nature conservation as a result of the Proposed Development.

Point 3(c): [...] *The applicant is requested to clarify if fencing of boundary hedgerow will prevent access and movement of fauna such as hedgehog between the Proposed Development (and retained woodland habitat within the Proposed Development) and woodland habitat outside and bounding the Proposed Development site.*

As confirmed in the revised *Landscape Strategy Submission*, a proposed timber post and high-tensile wire picture and detail has been added to the boundary treatment plan and strategy page of the *Landscape Strategy Submission*. Refer to pg18 of the revised document and CSR drawing 19164-2-3123-*Boundary Treatment Plan*. In addition, estate railings have been added to the proposed hedgerow along the DDR. Both the post and high-tensile wire fence and estate railings have ample clearance at ground level for movement of fauna, including hedgehogs, and would not present as an obstacle. In other words, the movement of hedgehogs within the development and within the wider landscape will not be impeded by the Proposed Development.

Point 3(d): [...] *The applicant is requested to clarify how a dark corridor will be maintained if operational lighting proposed throughout the Proposed Development will be located adjacent to woodland.*

As confirmed in the revised *Landscape Strategy Submission*, and by way of clarification, there will be no lighting located immediately adjacent to the woodland edge as suggested in the RFI point – in fact this was never the case. A 7-metre lighting radius around the lighting columns is shown on the landscape drawings, but this does not indicate light spill – it is simply to denote the actual locations of the poles in accordance with FCC requirements.

The inclusion of a small number of lighting columns to illuminate the path does not in any way impact on the woodland, or on the bat box. The lighting columns are to be located on the western (woodland-side) of the path, as was always the case – which means the light can shine away from the protected woodland. As is made clear in Section 8.5.1.7 of the EIAR, the dark corridor will be maintained along the woodland adjoining Priory Wood. This is because the lighting, by ENX, has been designed in accordance with all best practice design criteria including the references listed in the EIAR biodiversity chapter, and in accordance with the lighting design requirements of Fingal County Council. It will be possible to retain this dark corridor, because the lighting columns and fittings are designed to avoid any light spill to the rear – they face east, away from the woodland and illuminate the path only. Furthermore, the light fittings have no UV component, and comprise warm, white light.

The revised design of the Proposed Development has resulted in the footpath and associated lighting columns being moved c.8m east, further away from the woodland. This is beneficial, in that it creates a wider buffer to the woodland, however it has no effect on the conclusions set out in the EIAR Biodiversity chapter including in relation to lighting, specifically that the residual impact of the Proposed Development is assessed to be long-term, imperceptible and negative. It is not significant.

Point 3(e): [...] *The applicant is requested to clarify if the total length of hedgerow that will be lost as part of the Proposed Development will be replaced and where it will be located.*

As confirmed in the revised *Landscape Strategy Submission*, the lengths of hedgerow to be removed have been added to the vegetation retention and removal plan (refer to CSR drawing 19164-2-3120-*Vegetation Retention and Removal*). In total, 100 linear metres of existing hedgerow will be removed. It is to be noted that 537 linear metres of new hedgerow will be planted, resulting in a net increase in hedgerow within the site of 437 linear metres

Point 3(f): [...] *The applicant is requested to clarify if the total length of hedgerow planting removed will be replanted with appropriate native species. The applicant is also requested to clarify what groups of proposed planting (e.g. meadow grass, native hedgerow, woodland planting) will include native species, the extent native species will be used (e.g. 100% hedgerow planting, or 50% woodland planting) and where these areas of planting are to be located in relation to retained hedgerow and woodland planting. The applicant is also requested to clarify what groups of proposed planting will comprise non-native pollinator friendly planting, where these areas of planting will be located within the Proposed Development in relation to retained hedgerow and woodland planting.*

As confirmed in the revised *Landscape Strategy Submission*, quantities (areas and lengths) of removed planting have been added to the vegetation retention and removal plan (CSR drawing 19164-2-3120-*Vegetation Retention and Removal*). Proposed new hedgerow planting is shown on the boundary treatment plan (CSR drawing 19164-2-3123-*Boundary Treatment Plan*).

In total, 100 linear metres of existing hedgerow will be removed and 1220m² of bramble will be removed. It is to be noted that 537 linear metres of new hedgerow will be planted, resulting in a net increase in hedgerow within the site of 437 linear metres.

CSR drawing 19164-2-3171-*Planting Strategy* identifies planting locations and species lists.

CSR drawing 19164-2-3172-*Tree Planting Strategy* identifies tree planting type locations and species lists.

The species lists denote which scheduled plants and trees are native, pollinator friendly, or both.

Addendum to Chapter 8: Biodiversity

With respect to the amendments to the Proposed Development detailed in Section 1.2 of this EIAR Addendum report, the clarifications presented in this section and in the revised *Landscape Strategy Submission*, there are no changes to the conclusions set out in Chapter 8 of the EIAR regarding the potential impact the Proposed Development will have on biodiversity.

No additional mitigation measures are required beyond those previously detailed in EIAR Chapter 8 (Biodiversity).

The predicted effect on Biodiversity from the overall development remains the same as set out in *Section 8.13 – Conclusion* of the EIAR as originally submitted.

8.1 Introduction

No significant updates are required for this chapter, and the assessment of impacts, mitigation measures, and residual effects remain as previously described in the original EIAR.

8.2 Method

No changes to methodologies that would affect the impact assessment.

8.3 Baseline Environment

There is no change to the baseline biodiversity provided in the original EIAR.

8.4 Predicted Impacts of the Proposed Development

There are no changes to the potential impacts on biodiversity during construction or operation phase as provided in the original EIAR.

8.5 Mitigation Measures

There is no change to the mitigation measures for biodiversity as provided in the original EIAR.

8.6 Residual Impacts

There is no change to the assessment of residual impacts on biodiversity as provided in the original EIAR.

8.7 Indirect and / or Secondary Impacts

There is no change to the assessment of potential indirect and / or secondary impacts for biodiversity as provided in the original EIAR.

8.8 Monitoring

There is no change to the monitoring requirements for biodiversity as provided in the original EIAR.

8.7 Indirect and / or Secondary Impacts

There is no change to the monitoring requirements for biodiversity as provided in the original EIAR.

8.9 Reinstatement

There is no change to the reinstatement requirements for biodiversity as provided in the original EIAR.

8.10 Interactions

There is no change to the assessment of potential interactions for biodiversity as provided in the original EIAR.

8.11 Cumulative Impacts

There is no change to the assessment of potential cumulative impacts for biodiversity as provided in the original EIAR.

8.12 Difficulties Encountered in Compiling the Chapter

There is no change to description of difficulties encountered in compiling the chapter for biodiversity as provided in the original EIAR.

8.13 Conclusion

There is no change to the findings of the conclusion for biodiversity as provided in the original EIAR.

Chapter 9: Land, Soils, Geology & Hydrogeology

9.1 Introduction

No significant updates are required for this chapter, and the assessment of impacts, mitigation measures, and residual effects remain as previously described in the original EIAR.

9.2 Method

No changes to methodologies that would affect the impact assessment.

9.3 Baseline Environment

There is no change to the baseline land, soils, geology & hydrogeology provided in the original EIAR. The baseline conditions of the site, characterised by agricultural soils and underlying geological conditions typical of the Donabate area, remain unchanged.

9.4 Predicted Impacts of the Proposed Development

The scale and nature of excavation and site works have not materially altered. There are no changes to the potential impacts on land, soils, geology & hydrogeology during construction or operation phase as provided in the original EIAR.

9.5 Mitigation Measures

There is no change to the mitigation measures for land, soils, geology & hydrogeology as provided in the original EIAR.

9.6 Residual Impacts

There is no change to the assessment of residual impacts on land, soils, geology & hydrogeology as provided in the original EIAR.

9.7 Indirect and / or Secondary Impacts

There is no change to the assessment of potential indirect and / or secondary impacts for land, soils, geology & hydrogeology as provided in the original EIAR.

9.8 Monitoring or Reinstatement

There is no change to the monitoring or reinstatement requirements for land, soils, geology & hydrogeology as provided in the original EIAR.

9.9 Interactions

There is no change to the assessment of potential interactions for land, soils, geology & hydrogeology as provided in the original EIAR.

9.10 Cumulative Impacts

There is no change to the assessment of potential cumulative impacts for land, soils, geology & hydrogeology as provided in the original EIAR.

9.11 Difficulties Encountered in Compiling the Chapter

There is no change to description of difficulties encountered in compiling the chapter for land, soils, geology & hydrogeology as provided in the original EIAR.

9.12 Conclusion

There is no change to the findings of the conclusion for land, soils, geology & hydrogeology as provided in the original EIAR.

9.13 References

There is no change to the references as provided in the original EIAR.

Chapter 10: Hydrology

10.1 Introduction

The overall drainage strategy, including SuDS measures and connection to existing networks, remains as described in the original EIAR. The revisions to the Proposed Development do not materially alter runoff characteristics or flood risk. The original EIAR assessment and conclusions remain valid.

No significant updates are required for this chapter, and the assessment of impacts, mitigation measures, and residual effects remain as previously described in the original EIAR.

10.2 Method

No changes to methodologies that would affect the impact assessment.

10.3 Baseline Environment

There is no change to the baseline hydrology provided in the original EIAR.

10.4 Predicted Impacts of the Proposed Development

There are no changes to the potential impacts on hydrology during construction or operation phase as provided in the original EIAR.

10.5 Mitigation Measures

There is no change to the mitigation measures for hydrology as provided in the original EIAR.

10.6 Residual Impacts

There is no change to the assessment of residual impacts on hydrology as provided in the original EIAR.

10.7 Indirect and / or Secondary Impacts

There is no change to the assessment of potential indirect and / or secondary impacts for hydrology as provided in the original EIAR.

10.8 Monitoring or Reinstatement

There is no change to the monitoring or reinstatement requirements for hydrology as provided in the original EIAR.

10.9 Interactions

There is no change to the assessment of potential interactions for hydrology as provided in the original EIAR.

10.10 Cumulative Impacts

There is no change to the assessment of potential cumulative impacts for hydrology as provided in the original EIAR.

10.11 Difficulties Encountered in Compiling the Chapter

There is no change to description of difficulties encountered in compiling the chapter for hydrology as provided in the original EIAR.

10.12 Conclusion

There is no change to the findings of the conclusion for hydrology as provided in the original EIAR.

10.13 References

There is no change to the references as provided in the original EIAR.

Chapter 11: Air Quality

11.1 Introduction

The assessment of construction dust impacts and operational air quality effects remains valid. Although there is a modest increase in residential units, this does not materially alter traffic generation or emissions to a degree that would change the significance of effects. No changes to mitigation or conclusions are required.

No significant updates are required for this chapter, and the assessment of impacts, mitigation measures, and residual effects remain as previously described in the original EIAR.

11.2 Method

No changes to methodologies that would affect the impact assessment.

11.3 Baseline Environment

There is no change to the baseline air quality provided in the original EIAR.

11.4 Predicted Impacts of the Proposed Development

There are no changes to the potential impacts on air quality during construction or operation phase as provided in the original EIAR.

11.5 Mitigation Measures

There is no change to the mitigation measures for air quality as provided in the original EIAR.

11.6 Residual Impacts

There is no change to the assessment of residual impacts on air quality as provided in the original EIAR.

11.7 Monitoring

There is no change to the monitoring requirements for air quality as provided in the original EIAR.

11.8 Reinstatement

There is no change to the reinstatement requirements for air quality as provided in the original EIAR.

11.9 Interactions

There is no change to the assessment of potential interactions for air quality as provided in the original EIAR.

11.10 Indirect and / or Secondary Impacts

There is no change to the monitoring requirements for air quality as provided in the original EIAR.

11.11 Cumulative Impacts

There is no change to the assessment of potential cumulative impacts for air quality as provided in the original EIAR.

11.12 Difficulties Encountered in Compiling the Chapter

There is no change to description of difficulties encountered in compiling the chapter for air quality as provided in the original EIAR.

11.13 Conclusion

There is no change to the findings of the conclusion for air quality as provided in the original EIAR.

11.14 References

There is no change to the references as provided in the original EIAR.

Chapter 12: Climate

12.1 Introduction

The assessment of greenhouse gas emissions and climate resilience remains unchanged. The revisions to the Proposed Development do not materially affect energy use, emissions profiles or climate risks.

No significant updates are required for this chapter, and the assessment of impacts, mitigation measures, and residual effects remain as previously described in the original EIAR.

12.2 Method

No changes to methodologies that would affect the impact assessment.

12.3 Baseline Environment

There is no change to the baseline climate provided in the original EIAR.

12.4 Predicted Impacts of the Proposed Development

There are no changes to the potential impacts on climate during construction or operation phase as provided in the original EIAR.

12.5 Mitigation Measures

There is no change to the mitigation measures for climate as provided in the original EIAR.

12.6 Residual Impacts

There is no change to the assessment of residual impacts on climate as provided in the original EIAR.

12.7 Monitoring

There is no change to the monitoring requirements for climate as provided in the original EIAR.

12.8 Reinstatement

There is no change to the reinstatement requirements for climate as provided in the original EIAR.

12.9 Interactions

There is no change to the assessment of potential interactions for climate as provided in the original EIAR.

12.10 Indirect and / or Secondary Impacts

There is no change to the monitoring requirements for climate as provided in the original EIAR.

12.11 Cumulative Impacts

There is no change to the assessment of potential cumulative impacts for climate as provided in the original EIAR.

12.12 Difficulties Encountered in Compiling the Chapter

There is no change to description of difficulties encountered in compiling the chapter for climate as provided in the original EIAR.

12.13 Conclusion

There is no change to the findings of the conclusion for climate as provided in the original EIAR.

12.14 References

There is no change to the references as provided in the original EIAR.

Chapter 13: Noise & Vibration

The following is provided for clarity in response to RFI item 4(e), however, there is no change to the information, assessments or conclusions presented in Chapter 13 of the EIAR submitted with the application.

RFI 4(e):

Item 4: The applicant is requested address/clarify the following items and submit a revised EIAR to reflect their responses:

(e) Regarding Chapter 13 (Noise & Vibration) of the EIAR, the applicant is requested to review the glazing and ventilation requirements so that the internal noise levels as set out in BS8233:2014 'Guidance on Sound Insulation and Noise Reduction for Buildings, Table 4: Indoor Ambient Noise Levels for Dwellings' are met across all dwellings in the development, including road facing houses and apartments. Revised glazing and ventilation proposals should demonstrate compliance with Table 4 internal noise level requirements for all dwellings, including road facing houses and apartments, and ensures adequate mitigation of road traffic noise impacts. The applicant shall not rely on a 5dB relaxation of the standard.

RFI 4(e) Response:

The measured noise levels across the development site are categorised as low risk in accordance with ProPg 2017 due to the setback distances from the surrounding road network. The highest measured noise levels were recorded at monitoring location UN01 along the DDR R126 road. This monitoring location is representative of the most exposed residential buildings to road traffic noise within the Proposed Development (Apartment blocks BA07, BA08 and the housing facades overlooking the DDR R126 road). The external noise levels assigned to these most exposed building facades (South East) are also categorised as low in accordance with ProPG 2017.

The assessment has determined that when windows are closed with a standard double glazed configuration to the apartment and housing windows, a good internal noise level in accordance with Table 4 'Indoor ambient noise levels for Dwellings' within BS 8233:2014 Guidance on Sound Insulation and Noise Reduction for Buildings, is achieved within all bedrooms during day and night-time periods. The assessment has confirmed that no specific acoustic glazing is required to achieve this scenario over and above standard double glazing (i.e. an SRI of at least 31 dB Rw).

When windows are open, a reduction in façade sound insulation performance will occur as is standard, however, even under this scenario, the predicted internal ambient noise levels are of the order of 33 dB LAeq within bedrooms along the South East façade of apartment blocks BA07, BA08 and the housing facades overlooking the DDR R126 road at night. This noise level achieves a good to reasonable internal noise environment in accordance with ProPg 2017 and BS 8233:2014 guideline ranges with an open window.

It is noted across the remainder of the development site that 'good' internal night time noise levels are achieved with windows open. Reference to ProPg 2017 notes the following:

"Designing the site layout and the dwellings so that the internal target levels can be achieved with open windows in as many properties as possible demonstrates good acoustic design. Where it is not possible to meet internal target levels with windows open, internal noise levels can be assessed with windows

closed, however any façade openings used to provide whole dwelling ventilation (e.g. trickle ventilators) should be assessed in the “open” position and, in this scenario, the internal LAeq target levels should not normally be exceeded.”

“2.34: Where the LPA accepts that there is a justification that the internal target noise levels can only be practically achieved with windows closed, which may be the case in urban areas and at sites adjacent to transportation noise sources, special care must be taken to design the accommodation so that it provides good standards of acoustics, ventilation and thermal comfort without unduly compromising other aspects of the living environment. In such circumstances, internal noise levels can be assessed with windows closed but with any façade openings used to provide “whole dwelling ventilation” in accordance with Building Regulations Approved Document F (e.g. trickle ventilators) in the open position (see Supplementary Document 2). Furthermore, in this scenario the internal LAeq target noise levels should not generally be exceeded.”

There are no guidance documents either at a local level or an international level that AWN is aware of which would support the approach of achieving the ideal internal noise levels in the open window scenario across a full development, especially for buildings close to road traffic sources. It is, therefore, considered suitable to provide building façades with a standard level of sound insulation i.e. standard double glazed units and equivalent ventilation, such that with windows closed but vents opened, a good internal acoustic environment is achieved. It is reiterated again this scenario only applies to the most exposed apartment and housing facades discussed above.

To conclude, the glazing and ventilation requirements for all buildings are not required to incorporate any enhanced acoustic specification over and above those associated with standard units in order to achieve the good internal noise criteria set out within Table 4 of BS 8233 (2019).

Addendum to Chapter 13: Noise

With respect to the amendments to the Proposed Development detailed in Section 1.2 of this EIAR Addendum report, and the clarifications presented in this section, there are no changes to the conclusions set out in Chapter 13 of the EIAR regarding the potential impact the Proposed Development will have as a result of noise.

No additional mitigation measures are required beyond those previously detailed in EIAR Chapter 13 (Noise).

The predicted effect from Noise remains the same as set out in Section 13.14 – Conclusion of the EIAR as originally submitted.

13.1 Introduction

No significant updates are required for this chapter, and the assessment of impacts, mitigation measures, and residual effects remain as previously described in the original EIAR.

13.2 Methodology

No changes to methodologies that would affect the impact assessment.

13.3 Baseline Environment

There is no change to the baseline noise environment provided in the original EIAR.

13.4 Characteristics of the Proposed Development

There are no changes to the characteristics of the Proposed Development (other than as noted in section 1.2 of this Addendum) as provided in the original EIAR.

13.5 Potential Impacts of the Proposed Development

There are no changes to the potential impacts from noise during construction or operation phase as provided in the original EIAR.

13.6 Remedial and Mitigation Measures

There is no change to the remedial or mitigation measures for noise as provided in the original EIAR.

13.7 Residual Impacts of the Proposed Development

There is no change to the assessment of residual impacts for noise as provided in the original EIAR.

13.8 Indirect and / or Secondary Impacts

There is no change to the assessment of potential indirect and / or secondary impacts for noise as provided in the original EIAR.

13.9 Monitoring or Reinstatement

There is no change to the monitoring or reinstatement requirements for noise as provided in the original EIAR.

13.10 Operational Phase – Acoustic Design Statement

There is no change to the acoustic design statement as provided in the original EIAR.

13.11 Interactions

There is no change to the assessment of potential interactions for noise as provided in the original EIAR.

13.12 Cumulative Impacts

There is no change to the assessment of potential cumulative impacts for noise as provided in the original EIAR.

13.13 Do-Nothing Impact

There is no change to the assessment of the do-nothing scenario for noise as provided in the original EIAR.

13.14 Conclusion

There is no change to conclusion of the noise impact assessment as provided in the original EIAR.

13.15 References

There is no change to the references as provided in the original EIAR.

Chapter 14: Landscape & Visual

The full chapter has been included in this Addendum for clarity as new text has been provided or text has been changed in a number of places in the chapter. New and/or changed text is highlighted in red in the following.

14.1 Introduction

This Landscape and Visual Impact Assessment (LVIA) describes the landscape at the location of the Proposed Development in Donabate, Co. Dublin, and assesses the likely impacts of the Proposed Development on landscape and visual amenity. It was informed by a desktop study and site surveys over the course of the masterplan development and Phases 1-3 design from 2019 – 2025. The most recent site survey was carried out in March 2025.

The Phase 3 development site is approximately 11.28 ha. The site is located on the eastern fringe of the village of Donabate. The Phase 3 development is part of a larger area of land, including the permitted Phase 2 (Planning Reg. No: LRD0039/S3 & ABP Ref. 320885) immediately south and the permitted Phase 1 (Planning Reg No: LRD0008/S3 & ABP Ref. 315288) further south and south-east, totalling approximately 32ha. The Donabate Distributor Road (DDR) (R126) lies to the east of the site. This report discusses and assesses the Phase 3 site and its impacts in the context of the wider masterplan and zoned lands and refers to them as Phase 3 and Masterplan as appropriate.

This assessment has been prepared by Cunnane Stratton Reynolds Ltd (CSR), landscape architects and planners. This report is prepared by Declan O’Leary B.Agr.Sc. Land. Hort., Dip LA., CLI, MILI and Prithvi Gowda B.Arch., MScUD&P, CPM Dip. Declan has over 30 years’ experience in the design and analysis of landscape and the impacts of change, and the preparation of assessments for inclusion EIAR. Prithvi has over 7 years multi-disciplinary experience and has assisted in preparing LVIA’s.

14.2 Methodology

Landscape and Visual Impact Assessment (LVIA) is a tool used to identify and assess the significance of and the effects of change resulting from development on both the landscape as an environmental resource in its own right and on people’s views and visual amenity. The methodology followed for LVIA is that set out in the Guidelines for Landscape and Visual Impact Assessment by the Landscape Institute and the Institute of Environmental Management and Assessment (2013), 3rd Edition, hereafter referred to as the GLVIA.

It is important to note that this definition of landscape applies not only to all types of rural landscape, marine and coastal landscapes (seascapes) but also to the landscape of villages, towns and cities with a predominantly urban context and character (Section 2.5, LI, IEMA 2013).

Ireland is a signatory to the European Landscape Convention (ELC). The ELC defines landscape as “*An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors*”. This definition is important in that it expands beyond the idea that landscape is only a matter of aesthetics and visual amenity. It encourages a focus on landscape as a resource in its own right - a shared resource providing a complex range of cultural, environmental, and economic benefits to individuals and society.

14.2.1 Guidance

The GLVIA note that as a cultural resource, the landscape functions as the setting for our day-to-day lives, also providing opportunities for recreation and aesthetic enjoyment and inspiration. It contributes to the sense of place experienced by individuals and communities and provides a link to the past as a record of historic socio-economic and environmental conditions. As an environmental resource, the landscape provides habitat for fauna and flora. It receives, stores, conveys, and cleans water, and vegetation in the landscape, stores carbon and produces oxygen. As an economic resource, the landscape provides the raw materials and space for the production of food, materials (e.g. timber, aggregates) and energy (e.g. carbon-based fuels, wind, water, geothermal, solar), living and working space and for recreation and tourism activities.

The reversibility of change is an important consideration. If change must occur to meet a current need, can it be reversed to return the resource (in this case, the landscape and suburban fringe) to its previous state to allow for development or management for future needs.

Key Guidance Documents

Landscape and Visual Impact Assessment (LVIA) is a tool used to identify and assess the significance of and the effects of change resulting from development on both the landscape as an environmental resource in its own right and on people's views and visual amenity. The methodology for assessment of the landscape and visual effects is informed by the following key guidance documents, namely:

- Guidelines for Landscape and Visual Impact Assessment GLVIA, 3rd Edition Landscape Institute and the Institute of Environmental Management and Assessment, 2013
- Guidelines on the Information to be Contained in Environmental Impact Statements, EPA, 2022

The GLVIA is authored by the Landscape Institute in the UK and the IEMA, who contain a network of members in the UK, Ireland and internationally. The guidance was prepared within the parameters of relevant EU directives at the time and is updated, where necessary, by Landscape Institute bulletins online, including the LI TGN 06-19 Visual Representation of Development Proposals. The GLVIA is used internationally and is the industry standard for LVIA in Ireland. The EPA guidance 2022 refers to the use of topic specific guidance and specifically references the GLVIA in relation to professional judgement. The GLVIA (paragraph 3.72) recognise that:

“Some uncertainty is unavoidable in EIA, especially about matters that involve an element of judgement, such as assigning a level of significance to an effect. Such judgements should be explicit and substantiated rather than presented as objective fact. This is best done using agreed referable approaches, e.g. the Guidelines on Landscape and Visual Impacts Assessment provide guidance on what constitutes a severe visual effect”.

Policy Documents

References are made to the ‘Landscape and Landscape Assessment – Consultation Draft of Guidelines for Planning Authorities’ document, published in 2000 by the Department of Environment, Heritage and Local Government.

Definitions and descriptions of sensitivity, magnitude of change and quality and longevity of effects are derived from the GLVIA. The GLVIA does not set out specific definitions of descriptions used but

contains key widely used principles and case studies / examples that are intended to inform a professional's methodology, supported by their experience and judgements in relation to landscape and landscape change. These descriptions expand and complement the EPA guidelines as intended in relation to topic specific guidance.

14.2.2 Landscape and Visual Assessment Process

The GLVIA outline the assessment process, which combines judgements on the sensitivity of the resource, and the magnitude of the change as a result of the Proposed Development. These are combined to reach an assessment of the significance of the effect.

Critical for the assessment is the distinction the GLVIA methodology applies, between *landscape effects* and the *visual effects* of a Proposed Development.

Landscape results from the interplay between the physical, natural and cultural components of our surroundings. Different combinations of these elements and their spatial distribution create distinctive character of landscape in different places. 'Landscape character assessment' is the method used in LVIA to describe landscape, and by which to understand the potential effects of a development on the landscape as 'a resource'. Character is not just about the physical elements and features that make up a landscape, but also embraces the aesthetic, perceptual and experiential aspects of landscape that make a place distinctive.

Views & Visual Amenity refer to the interrelationship between people and the landscape. The GLVIA prescribes that effects on views and visual amenity should be assessed separately from landscape, although the two topics are inherently linked. Visual assessment is concerned with changes that arise in the composition of available views, the response of people to these changes and the overall effects on the area's visual amenity.

The assessment of Landscape and Visual Effects assesses the effects of the development on the landscape as a resource, and on the fabric and character of the landscape. Assessment of visual effects relates to the change in views and visual amenity experienced by groups of people. The assessment includes the review of the Proposed Development, desktop study, and several site visits both to the site and the wider landscape. This approach emphasises the distinction between the assessment of *Landscape Effects* and *Visual Effects*, which, though related, are assessed separately.

14.2.3 Establishment of Baseline

The process set out in the GLVIA 2013 and in EPA 2022 guidance involves the preparation of the baseline or receiving environment characteristics. This includes two stages, which are a desk based study and site visit / field study. These allow the assessor to establish the existing receiving environment and key landscape and visual characteristics and their sensitivities.

The desk based study includes:

- Review of preliminary proposals and identification of preliminary study area,
- Review of current Development Plan within the study area, and any other plans as appropriate, to identify relevant national and local designations and policies. This may include designations such as scenic routes, protected views and other landscape designations including any Landscape Character

Assessments (International designations such as UNESCO designations would also be relevant here, if present), and

- Other information that may be consulted include aerial imagery, OSI Discovery series mapping, historic (6-inch and 25 inch) mapping and CORINE Landcover Maps (2018).

A site visit is then carried out to review and / or confirm the findings of the desk based study and provide a more detailed description of the landscape and visual character of the study area. Based on both the desk study and site visit, the assessor identifies landscape and visual receptors and their relative sensitivity. Site visits were carried out in March 2025.

14.2.4 Assessment of Effects

Once the Baseline is established, and the Proposed Development drawings and descriptions reviewed, the assessment process is commenced, as per the GLVIA and as outlined below.

Use of 'Impact' and 'Effect'

Section 1.16 of the GLVIA (referring to the EIA Directive), advises that the terms **Impact** and **Effect** should be clearly distinguished and consistently used in the preparation of an LVIA.

Impact is defined as the action being taken. In the case of the Proposed Development, the impact would include the construction of the proposed buildings, streets and associated open spaces and external areas, among other features.

Effect is defined as the change or changes resulting from those actions, e.g. a change in landscape character, land cover, or changes to the composition, character and quality of views in the receiving environment. This report focusses on these effects.

14.2.5 Methodology for Landscape Assessment

In Section 14.5 Predicted Landscape Impacts of this report, the landscape effects of the Proposed Development are assessed. The nature and scale of changes to the landscape elements and characteristics are identified, and the consequential effects on landscape character are discussed. Trends of change in the landscape are taken into account. The assessment of the significance of effects takes account of the sensitivity of the landscape resource and the magnitude of change to the landscape, which will result from the Proposed Development.

Definitions and descriptions of sensitivity, magnitude of change, quality and longevity of effects are derived from the GLVIA. The GLVIA does not set out specific definitions of descriptions used, but contains key widely used principles and case studies / examples that are intended to inform a professional's methodology, supported by their experience and judgements in relation to landscape and landscape change. These descriptions expand and complement the EPA guidelines as intended, in relation to topic- specific guidance.

Sensitivity of the Landscape Resource

Sensitivity is a combination of Landscape Value and Landscape Susceptibility.

Landscape values can be identified by the presence of landscape designations or policies, which indicate particular values, either on a national or local level. In addition, a number of criteria are used to assess the value of a landscape. These are described further below, in **Table 14.1**.

Landscape susceptibility is defined in the GLVIA as:

“The ability of the landscape receptor to accommodate the Proposed Development without undue consequences for the maintenance of the baseline scenario and/or the achievement of landscape planning policies and strategies.”

Susceptibility also relates to the type of development – a landscape may be highly susceptible to certain types of development but have a low susceptibility to other types of development.

Landscape susceptibility (in terms of its ability to accommodate the Proposed Development) in relation to residential developments can include consideration of:

- Topography and skyline – uplands can easier absorb residential development depending on siting and design
- Landscape pattern and landcover – a simple landscape pattern can be less susceptible than a complex pattern, including varying types of landcover
- Settlement pattern – this can influence susceptibility

It includes consideration of landscape values as well as the susceptibility of the landscape to change. Landscape sensitivity is a function of its land use, landscape patterns and scale, visual enclosure and distribution of visual receptors, scope for mitigation, and the value placed on the landscape. It also relates to the nature and scale of development proposed.

Landscape Sensitivity ranges from *Very High* to *Negligible* as outlined in **Table 14.1** below.

Table 14.1 Categories of Landscape Sensitivity

Sensitivity	Description
Very High	Areas where the landscape exhibits a very strong, positive character with valued elements, features and characteristics that combine to give an experience of unity, richness and harmony. The character of the landscape is such that its capacity for accommodating change in the form of development is very low. These attributes are recognised in landscape policy or designations as being of national or international value and the principal management objective for the area is protection of the existing character from change.
High	Areas where the landscape exhibits strong, positive character with valued elements, features and characteristics. The character of the landscape is such that it has limited/low capacity for accommodating change in the form of development. These attributes are recognised in landscape policy or designations as being of national, regional or county value and the principal management objective for the area is conservation of the existing character.
Medium	Areas where the landscape has certain valued elements, features or characteristics but where the character is mixed or not particularly strong. The character of the landscape is such that there is some capacity for change in the form of development. These areas may be recognised in landscape policy at local or county level and the principal

	management objective may be to consolidate landscape character or facilitate appropriate, necessary change.
Low	Areas where the landscape has few valued elements, features or characteristics and the character is weak. The character of the landscape is such that it has capacity for change; where development would make no significant change or would make a positive change. Such landscapes are generally unrecognised in policy and where the principal management objective is to facilitate change through development, repair, restoration or enhancement.
Negligible	Areas where the landscape exhibits negative character, with no valued elements, features or characteristics. The character of the landscape is such that its capacity for accommodating change is high; where development would make no significant change or would make a positive change. Such landscapes include derelict industrial lands or extraction sites, as well as sites or areas that are designated for a particular type of development. The principal management objective for the area is to facilitate change in the landscape through development, repair or restoration.

14.2.6 Magnitude of Landscape Change

The magnitude of change is a factor of the scale, extent and degree of change imposed on the landscape with reference to its key elements, features, and characteristics (also known as ‘landscape receptors’). Five categories are used to classify Magnitude of Landscape Change.

For the purpose of assessment, five categories are used to classify the **Magnitude of Landscape Change** on the receiving environment, from *Very High* to *Negligible*. These categories are defined in **Table 14.2** below.

Table 14.2 Magnitude of Landscape Change

Magnitude of Landscape Change	Description
Very High	Change that is large in extent, resulting in the loss of, or major alteration to key elements, features or characteristics of the landscape and/or introduction of large elements considered totally uncharacteristic in the context. Such development results in fundamental change in the character of the landscape.
High	Change that is moderate to large in extent, resulting in alteration or compromise to key elements, features or characteristics, and/or introduction of large elements considered uncharacteristic in the context. Such development results in a moderate to large change to the character of the landscape.
Medium	Change that is moderate in extent, resulting in partial loss or alteration to key elements, features or characteristics of the landscape, and/or introduction of elements that may be prominent but not necessarily uncharacteristic in the context. Such development results in moderate change to the character of the landscape.

Magnitude of Landscape Change	Description
Low	Change that is moderate or limited in scale, resulting in minor alteration to key elements, features or characteristics of the landscape, and/or introduction of elements that are not uncharacteristic in the context. Such development results in minor change to the character of the landscape.
Negligible	Change that is very limited in extent, resulting in no alteration to key elements, features, or characteristics of the landscape, and/or introduction of elements that are characteristic in the context. Such development results in minimal change to the character of the landscape.

14.2.7 Methodology for Visual Assessment

In Sections 14.6 Predicted Visual Impacts, the visual effects of the Proposed Development are assessed. Visual assessment considers the sensitivity of the viewers, (i.e. groups of people) and the magnitude of the changes to the composition and character of views. The assessment is made for a number of viewpoints selected to represent the range of visual receptors in the receiving environment. The significance of the visual effects experienced at these locations is assessed by measuring the visual receptor sensitivity against the magnitude of change to the view resulting from the Proposed Development.

Sensitivity of the Visual Receptor

Visual receptor sensitivity is a function of the following two main considerations:

1. Susceptibility of the visual receptor to change. This depends on the occupation or activity of the people experiencing the view, and the extent to which their attention or interest is focussed on the views or visual amenity they experience at that location. Visual receptors most susceptible to change include residents at home, people engaged in outdoor recreation focused on the landscape (e.g. trail users), and visitors to heritage or other attractions and places of community congregation where the setting contributes to the experience. Visual receptors less susceptible to change include travellers on road, rail and other transport routes (unless on recognised scenic routes which would be more susceptible), people engaged in outdoor recreation or sports where the surrounding landscape does not influence the experience, and people in their place of work or shopping where the setting does not influence their experience.
2. Value attached to the view. This depends to a large extent on the subjective opinion of the visual receptor but also on factors such as policy and designations (e.g. scenic routes, protected views), or the view or setting being associated with a heritage asset, visitor attraction or having some other cultural status (e.g. by appearing in arts).

For the purpose of assessment, five categories are used to classify **Sensitivity of Visual Receptor**. These categories range from *Very High* to *Negligible* and are described in **Table 14.3** below.

Table 14.3 Categories of Sensitivity of Visual Receptor

Sensitivity	Description
Very High	Viewers at iconic viewpoints - towards or from a landscape feature or area that are recognised in policy or otherwise designated as being of high value or national value. This may also include residential viewers who are focussed to a large extent on the view.
High	Viewers at viewpoints that are recognised in policy or otherwise designated as being of value, or viewpoints that are highly valued by people that experience them regularly (such as views from houses or outdoor recreation features) and views which are highly valued by the local community. This may also include tourist attractions, and heritage features of regional or county value, and viewers travelling on scenic routes.
Medium	Viewers considered of medium susceptibility, such as locations where viewers are travelling at slow or moderate speeds through or past the affected landscape in cars or on public transport, where they are partly but not entirely focused on the landscape, or where the landscape has some valued views. The views are generally not designated, but include panoramic views or views judged to be of some scenic quality, which demonstrate some sense of naturalness, tranquillity or some rare element in the view.
Low	Viewers at viewpoints reflecting people involved in activities not focused on the landscape e.g. people at their place of work or engaged in similar activities such as shopping, etc. The view may present an attractive backdrop to these activities but there is no evidence that the view is valued and not regarded as an important element of these activities. Viewers travelling at high speeds (e.g. motorways) may also be generally considered of low susceptibility.
Negligible	Viewpoints reflecting people involved in activities not focused on the landscape e.g. people at their place of work or engaged in similar activities such as shopping where the view has no relevance or is of poor quality and not valued.

14.2.8 Magnitude of Change to the View

Classification of the magnitude of change takes into account the size or scale of the intrusion of the Proposed Development into the view, (relative to the other elements and features in the composition) i.e. its relative visual dominance), the degree to which it contrasts or integrates with the other elements and the general character of the view, and the way in which the change will be experienced (e.g. in full view, partial or peripheral, or glimpses). It also takes into account the geographical extent of the change, the duration and the reversibility of the visual effects. It should be noted that the proposed turbines are considered a '*reversible*' element, as on decommissioning they can be removed.

Five categories are used to classify **Magnitude of Change to a View**. These range from **Very High** to **Negligible** and are defined in **Table 14.4** below.

Table 14.4 Magnitude of Change to a View

Magnitude of Change	Description
Very High	Full or extensive intrusion of the development in the view, or partial intrusion that obstructs highly valued features or characteristics, or the introduction of elements that are completely out of character in the context, to the extent that the development becomes dominant in the composition and defines the character of the view and the visual amenity.
High	Extensive intrusion of the development in the view, or partial intrusion that obstructs valued features, or introduction of elements that may be considered uncharacteristic in the context, to the extent that the development becomes co-dominant with other elements in the composition and affects the character of the view and the visual amenity.
Medium	Partial intrusion of the development in the view, or introduction of elements that may be prominent but not necessarily uncharacteristic in the context, resulting in change to the composition but not necessarily the character of the view or the visual amenity.
Low	Minor intrusion of the development into the view, or introduction of elements that are not uncharacteristic in the context, resulting in minor alteration to the composition and character of the view but no change to visual amenity.
Negligible	Barely discernible intrusion of the development into the view, or introduction of elements that are characteristic in the context, resulting in slight change to the composition of the view and no change in visual amenity.

In this case, a number of tools are used to assist in the assessment of visual effects. These include Photomontages, which are produced from selected viewpoints. Initial viewpoints for photomontages are selected during the desk study with the exact location confirmed in the field during the site visit. The completed photomontages are also used to assist in the assessment of visual effects.

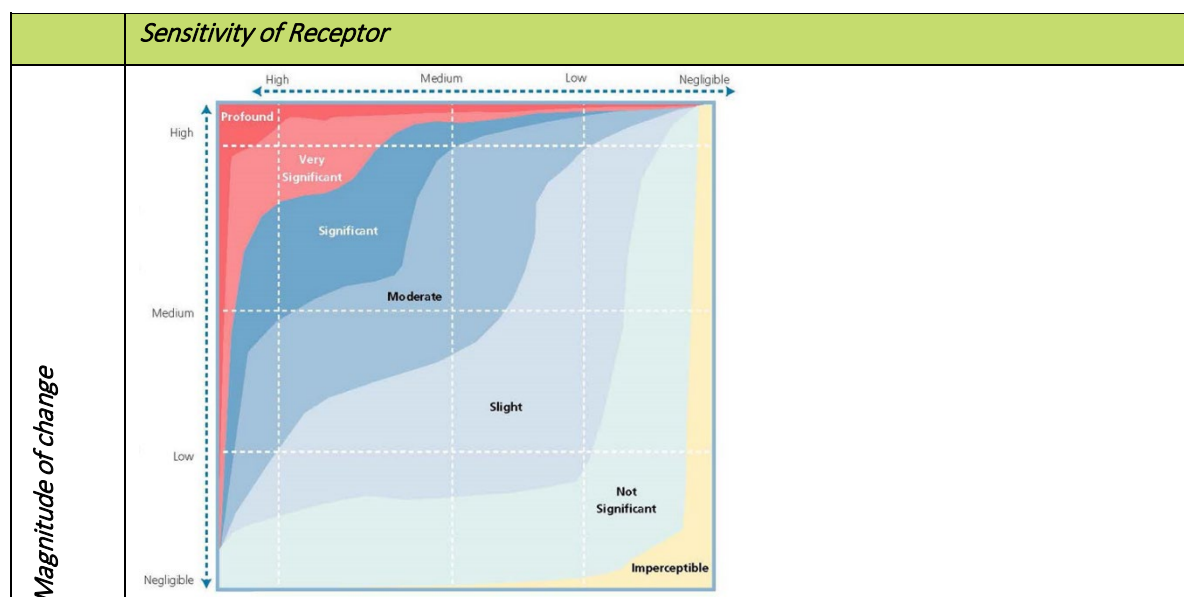
14.2.9 Significance of Effect

In order to classify the significance of landscape and visual effects, the predicted magnitude of change is measured against the sensitivity of the landscape/viewpoint. The definitions used by the EPA (2022) provide a useful scale to describe the significance of the effects. Seven classifications of significance are defined, namely:

1. Imperceptible
2. Not significant
3. Slight
4. Moderate
5. Significant
6. Very significant
7. Profound

Please refer to Table 14.5, below.

Table 14.5 Significance Matrix (based on EPA 2022 and GLVIA 2013)



Note: This table is a guideline only but is useful in illustrating the way in which judgements are combined to arrive at a judgement regarding significance, while illustrating that an element of professional judgment is also applied. The assessor also uses professional judgement informed by their expertise, experience and common sense, to arrive at a classification of significance that is reasonable and justifiable. The GLVIA 3rd Edition (Section 2.23) recognises that:

“Professional judgement is a very important part of LVIA. While there is scope for quantitative measurement of some relatively objective matters, much of the assessment must rely on qualitative judgements.”

14.2.9.1 Qualitative Impacts

The predicted impacts are also classified as beneficial, neutral, or adverse. This is not an absolute exercise, in particular, visual receptors’ attitudes to development, and thus their response to the impact of a Proposed Development, will vary. However, the methodology applied is designed to provide robust justification for the conclusions drawn. These qualitative definitions are included in Table 14.6 below.

Table 14.6 Quality of Effect

Quality of Effect	Definition
Adverse	Scheme at variance with landform, scale, pattern. Would degrade, diminish or destroy the integrity of valued features, elements or their setting or cause the quality of the landscape (townscape)/view to be diminished.
Neutral	Scheme complements (or does not detract from) the scale, landform and pattern of the landscape (townscape)/view and maintains landscape quality.

Quality of Effect	Definition
Beneficial	Improves landscape (townscape)/view quality and character, fits with the scale, landform and pattern and enables the restoration of valued characteristic features or repairs / removes damage caused by existing land uses.

14.2.9.2 Timescale of the Impacts

Impacts / effects are also categorised according to their longevity or timescale as in **Table 14.7** below.

Table 14.7 Duration of Effect

Duration	Description
Temporary	Effects lasting one year or less
Short Term	Effects lasting one to seven years
Medium Term	Effects lasting seven to fifteen years
Long Term	Effects lasting fifteen to sixty years
Permanent	Effects lasting over sixty years

Ballymastone LRD Phase 3

Environmental Impact Assessment Report (EIAR) Addendum

(permitted under ref: LRD0008/S3 and ref: LRD0039/S3 respectively). In summary, the Proposed Development will consist of the construction of a residential development, which represents Phase 3 of the wider development of the Ballymastone Lands, ranging in height from 2- to 6-storeys, to accommodate 433 no. residential dwellings (including a mix of apartments, duplexes and houses), private amenity space, a crèche (c. 567sq.m), and a community space (c. 216sq.m). The site will accommodate 305 no. car parking spaces in total (comprised of 296 no. residential spaces plus 4 no. spaces long-term and 5 no. short-term spaces for the crèche), 1,472 total no. bicycle parking spaces, new pedestrian/cycle links, road improvements, storage, services (including water, wastewater, electricity and telecommunications) and plant areas. Landscaping will include communal amenity areas, significant public open space (c. 17% of the overall site), and SuDS features.

The Proposed Development lies within an overall site area of 11.28ha. A detailed description of the Proposed Development is provided in Chapter 5 (Description of the Proposed Development).



Figure 14.3 Phase 3 Development Site refer to Drawing No - 19164-2-3101 Rev A

Key issues relating to landscape and visual impact include:

- The change from the existing field and partly disturbed landscape to a new built form, townscape and suburb.
- Building heights and their potential impact locally as well as on the wider sensitive visual receptors.
- Impacts / loss of trees and hedgerows.
- Place-making in accordance with local policy and good practice.
- Interfaces with existing established residential areas, those under construction and the wider town.
- New landscape structure, features and amenities / habitats including tree cover.

■ Potential impacts on the Portane ACA – St Ita’s Hospital Complex

14.4 Receiving Environment

This section sets out a review of landscape related Planning Policy as set out in the Fingal Development Plan and associated documents, and a description of the study area informed by desktop assessment.

The local planning and other policy in the Fingal County Development Plans are reviewed which identify development objectives and trends and also constraints on development in terms of protections and sensitivities. Precedent planning decisions may be described if appropriate.

The receiving environment is described in terms of its character, physical characteristics and the various elements that make up the landscape, including cultural, recreational, residential and other amenity values.

Cumulatively this analysis informs a description of the landscape in terms of values that support its protection and conservation and/or its enhancement or change. This reflects best practice guidance under the GLVIA.

14.4.1 Relevant Planning Policy

14.4.1.1 Fingal Development Plan 2023 – 2029

The *Fingal Development Plan 2023 – 2029* (‘the Plan’ hereafter), came into effect on 5th April 2023. The Plan contains a range of policies and objectives relevant to establishing the landscape and visual values and sensitivities for the site and site environs, and guiding the appropriate design and mitigation of impacts for the Proposed Development. These are set out below.

Section 1.4 of the Development Plan sets out the Strategic Objectives for the County. Objectives that are of relevance are listed below:

2. Continue the development of a network of well-serviced, well-connected, sustainable neighbourhoods which have a range of facilities, a choice of tenure and universally designed adaptable house types, promote social inclusion and integration of all minority communities.

3. Ensure new residential development is of the highest quality, endorsing the principles of healthy placemaking, enabling life cycle choices and physical, community, recreation and amenity infrastructure are provided in tandem, to create sustainable, healthy, inclusive and resilient communities.

5. Protect the unique character of Fingal. Support and facilitate revitalisation and consolidation of our towns, urban and rural villages and neighbourhoods, through placemaking and public realm initiatives, which encompasses a multi-faceted approach to planning, design and management.

7. Ensure the highest quality of public realm and urban design principles are applied to all new developments, ensuring developments contribute to a positive sense of place and local distinctiveness of an area and facilitate the universal design approach into all developments.

9. Reduce car dependency and promote and facilitate sustainable modes of transport. Prioritise walking, cycling and public transport, while supporting an efficient and effective transport system.

10. Protect, enhance and ensure the sustainable use of Fingal's key infrastructure, including water supplies and wastewater treatment facilities, energy supply including renewables, broadband and transportation.

11. Protect, enhance and connect areas of natural heritage, green infrastructure and open space for the benefits of quality of life, biodiversity, protected species and habitats, while having the potential to facilitate climate change adaptation and flood risk measures.

12. Protect, conserve and enhance the built and cultural heritage of Fingal, through promoting awareness, utilising relevant heritage legislation and ensuring good quality urban design principles are applied to all new developments. The principle that well planned and integrated development enhances the sustainability, attractiveness and quality of an area should be at the centre of any proposal."

Core Strategy and Settlement Strategy (Chapter 2 of the Development Plan)

Donabate lies within the Dublin Metropolitan Area Strategic Plan (MASP) boundary.

Donabate is designated as a 'Self-Sustaining Growth Town' within the Metropolitan Area, and is defined as a town with "a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining."

Self-Sustaining Growth Towns Policies:

- **Policy CSP31** – MASP Strategic Development Areas: Deliver strategic development areas identified in the MASP, located at key nodes along high-quality public transport corridors in tandem with the delivery of infrastructure and enabling services to ensure a steady supply of serviced sites and to support accelerated delivery of housing.
- **Policy CSP32** – Donabate LAP: Facilitate development on zoned residential lands within the settlement boundary of Donabate as prescribed in the Donabate LAP. Support the provision of the necessary social and community infrastructure including recreational facilities and strengthen and enhance the public realm, providing improved levels of connectivity and permeability.
- **Policy CSP33** – Consolidate Development and Protect Unique Identity of Donabate: Consolidate the development and protect the unique identity of Donabate.

Land Use

The site is zoned as 'Residential Area' (RA) with the objective to "provide for new residential communities subject to the provision of the necessary social and physical infrastructure".

Heritage

Chapter 10 of the Plan sets out policies and objectives for safeguarding heritage within the county.

Phase 3 application site partly lies within the Portrane Demesne Architectural Conservation Area (ACA).

Policy HCAP14 – Architectural Conservation Areas states

Protect the special interest and character of all areas which have been designated as an Architectural Conservation Area (ACA). Development within or affecting an ACA must contribute positively to its character and distinctiveness and take opportunities to protect and enhance the character and appearance of the area and its setting wherever possible. Development shall not harm buildings, spaces,

original street patterns, archaeological sites, historic boundaries or features, which contribute positively to the ACA.

The following Objectives are set out:

Objective DMSO186 – Retention of Existing Building Stock within an ACA

Retain the existing building stock within an ACA where possible and ensure that any new development or alteration of a building within or adjoining an ACA positively enhances the character of the area and is appropriate in terms of the proposed design, including: scale, mass, height, proportions, density, layout, materials, plot ratio, and building lines.

Objective DMSO187 – Planning Applications within an ACA

*All planning applications for works in an Architectural Conservation Area shall have regard to the information outlined in **Table 14.24**.*

Table 14.24: in the Development Management Standards Chapter contains Direction for Proposed Development within Architectural Conservation Areas.

Guidance is provided on the retention and reuse of existing structures and features; Alteration and new build in the ACA; and Public Realm Works.

The northernmost field that is part of the Phase 3 development site and also part of the ACA is (was) an open agricultural field enclosed to the north and west by woodland that was part of the demesne and the east by the Donabate Distributor Road. The site contains no built features however the layout is informed by the historic field boundaries (woods) that have been retained and incorporated into the scheme, ensuring key ACA features remain legible.

Appendix 5 of the Development Plan sets out a brief description of St Ita's Hospital Complex, Portrane, ACA, and valuable characteristics. These relate entirely to its scale as an asylum complex from the late 19th century, its distinctive red brick collection of buildings and their layout and architectural merit and its coastal setting.

There are no protected structures on Phase 3.

See Cultural Heritage Chapter within this EIAR for further details.

Historic Landscape Characterisation

Historic Landscape Characterisation (HLC) seeks to identify and to understand the historic development of today's landscape by placing emphasis on the contribution that past historic processes make to the character of the landscape as a whole, not just selected 'special sites'. The overall masterplan lands and the subject site falls within the Donabate HLC. It therefore contributes to a broader assessment and understanding of landscape character. It was prepared in May 2007.

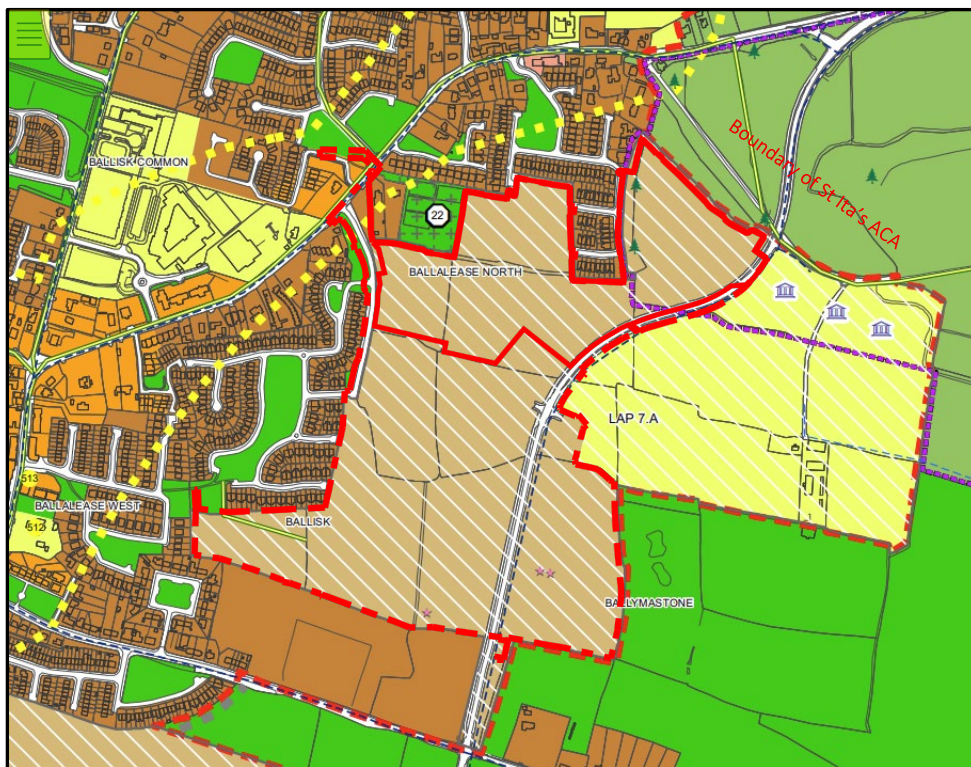


Figure 14.4 Excerpt of Land use zoning map (Phase 3 Core Area and Masterplan Lands identified)

Green Infrastructure and Natural Heritage

Chapter 9 of the Plan sets out Green Infrastructure and Natural Heritage objectives and policies. The following policies and objectives of pertinence are set out below:

- **Policy GINHP1 – Resilient Design:** *Promote an awareness of the benefits of resilient design and the multi-functional nature of green infrastructure. Apply multi-functional principles of green infrastructure to inform the Development Management process in terms of design and layout of new residential areas, business/industrial development and other significant projects while maximising the multi-functional nature of green infrastructure by ensuring the development of synergies between Public Open Space, Biodiversity, SuDS/Water Sensitive Design, Climate Change and Active Travel objectives.*
- **Policy GINHP2 – Protection of Green Infrastructure:** *Ensure that areas and networks of green infrastructure are identified, protected, enhanced, managed and created to provide a wide range of environmental, social and economic benefits to communities.*
- **Policy GINHP3 – Greening of Developments:** *Encourage measures for the ‘greening’ of new developments including the use of green roofs, brown roofs, green walls and water harvesting. Where feasible require new developments to incorporate greening elements such as green roofs,*

brown roofs, green walls, green car parking and SuDs (e.g. clean water ponds fed by rainwater via downpipes).

- **Policy GINHP5 – Green Infrastructure Network:** *Develop the green infrastructure network to ensure the conservation and enhancement of biodiversity, including the protection of European Sites, the provision of accessible parks, open spaces and recreational facilities (including allotments and community gardens), the sustainable management of water, the maintenance of landscape character including historic landscape character and the protection and enhancement of archaeological and heritage landscapes.*
- **Policy GINHP10:** *Green Infrastructure and Development Seek a net gain in Green Infrastructure through the protection and enhancement of existing assets, through the provision of new Green Infrastructure as an integral part of the planning process, and by taking forward priority projects including those indicated on the Development Plan Green Infrastructure maps during the lifetime of the Development Plan.*
- **Objective GINHO19:** *Green Networks: Create an integrated and coherent Green Infrastructure for the County by requiring the retention of substantial networks of green space in urban, urban fringe and adjacent countryside areas to serve the needs of communities now and in the future including the need to adapt to and mitigate climate change.*
- **Objective GINHO21:** *Integration of Green Infrastructure: Avoid the fragmentation of green spaces in site design and to link green spaces /greening elements to existing adjacent Green Infrastructure / the public realm where feasible and to provide for ecological functions.*
- **Objective GINHO22:** *Network Fragmentation: Resist development that would fragment or prejudice the County's strategic Green Infrastructure network.*

The following objectives of pertinence are set out in relation to biodiversity:

- **Objective GINHO2:** *Fragmentation: Reduce fragmentation and enhance the resilience of Fingal's GI network by strengthening ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional network by connecting all new developments into the wider Green Infrastructure network.*
- **Objective GINHO3:** *Biodiversity in Open Space: Make provision for biodiversity within public open space and include water sensitive design and management measures (including SuDS) as part of a sustainable approach to open space design and management.*
- **Objective GINHO4:** *Green Infrastructure and Development: Resist development that would fragment or prejudice the County's strategic Green Infrastructure network.*

The following policies and objectives of pertinence are set out in relation to parks, open space and recreation:

- **Policy GINHP6:** *Multi-Functionality: Ensure delivery of multifunctional green and civic spaces that meet community needs, promote active and passive recreation, flood and surface water management and local habitat improvements. The multi-functionality of spaces will be balanced against the need to protect and enhance local habitat and the recreational and functional requirements of parks.*
- **Objective GINHO7:** *Provision of Open Space: Provide a range of accessible new parks, open spaces and recreational facilities accommodating a wide variety of uses (both passive and active), use intensities and interests.*

- **Objective GINHO8:** *Routes: Provide attractive and safe routes linking parks and open spaces and other related features such as cultural sites and heritage assets as an integral part of Green Infrastructure provision, where appropriate and feasible.*
- **Objective GINHO9:** *Greenways and Net Gain: Ensure that all greenway developments have a biodiversity net gain. Nature conservation and opportunities for biodiversity enhancement will be a key part of these infrastructure projects and nature conservation will be considered throughout the lifetime of the project and into the future, following project completion.*

The following policies and objectives of pertinence are set out in relation to sustainable water management:

- **Policy GINHP7:** *Protection: Protect and enhance the natural, historical, amenity and biodiversity value of the County's watercourses, flood plains, riparian corridors, wetlands and coastal area through long-term and liaison with relevant Prescribed Bodies where appropriate.*
- **Objective GINHO12:** *Green Infrastructure Requirements: Ensure the provision of new Green Infrastructure addresses the requirements of functional flood storage, the sustainable management of coastal erosion, and links with provision for biodiversity, Sustainable Drainage Systems (SuDS) and provision for parks and open space wherever possible and appropriate.*
- **Objective GINHO13:** *Wetlands: Seek the creation of new wetlands and/or enhancement of existing wetlands through provision for Sustainable Drainage Systems (SuDS) where appropriate.*
- **Objective GINHO15:** *SuDs: Limit surface water run-off from new developments through the use of appropriate Sustainable Urban Drainage Systems (SuDS) using nature-based solutions and ensure that SuDS is integrated into all new development in the County.*

The following policies and objectives of pertinence are set out in relation to species protection:

- **Policy GINHP18:** *Species Protection: The Council will seek to protect rare and threatened species, including species protected by law and their habitats by requiring planning applicants to demonstrate that proposals will not have a significant adverse impact on such species and their habitats.*
- **Objective GINHO33:** *Annex I and Annex II: Ensure that development does not have a significant adverse impact on proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs), Statutory Nature Reserves, Refuges for Fauna, Habitat Directive Annex I sites and Annex II species contained therein, and on rare and threatened species including those protected by law and their habitats.*

Tree and Hedgerow Protection

There are 2 no. locations within the application site along the edge to the Priory Wood neighbourhood, and 1 no. just outside the site, to the north along the DDR and Martin's Lane identified under specific objective point to 'Protect & Preserve Trees, Woodlands and Hedgerows'.

The following policies and objectives of pertinence are set out in relation to protection and preservation of trees, woodlands and hedgerows:

- **Policy GINHP21:** *Protection of Trees and Hedgerows: Protect existing woodlands, trees and hedgerows which are of amenity or biodiversity value and/or contribute to landscape character and ensure that proper provision is made for their protection and management.*

- **Policy GINHP22:** *Tree Planting: Provide for appropriate protection of trees and hedgerows, recognising their value to our natural heritage, biodiversity and climate action and encourage tree planting in appropriate locations*
- **Objective GINHO45:** *Hedgerow Categorisation: Develop a 'Hedgerow Categorisation and Management Appraisal Tool' and associated appropriate planning and management requirements for Development Management purposes to ensure a sustainable future for retained hedgerows in - the context of new developments.*
- **Objective GINHO46:** *Tree Removal: Ensure adequate justification for tree removal in new developments and open space management and require documentation and recording of the reasons where tree felling is proposed and avoid removal of trees without justification.*
- **Objective GINHO47:** *Woodland Development Schemes: Promote and support woodland development schemes by identifying suitable areas to establish and enhance woodlands for biodiversity, climate change and recreational purposes in partnership with local communities in line with the adopted Forest of Fingal-A Tree Strategy for Fingal.*

Landscape Character Assessment

The landscape designations is covered under Section 9.6.14 of the Plan.

A Landscape Character Assessment (LCA) for Fingal was carried out, and provides for the classification of Fingal's landscapes into types and values and sensitivities. The LCA divides the County into six Landscape Character Types representing generic areas of distinctive character that makes one landscape different from another, such as uplands or the coast.

The LCA places a value on each landscape character type ranging from exceptional to modest. Subsequent to the type and value being identified, the sensitivity of each character type is defined as its overall ability to sustain its character in the face of change. Sensitivity is evaluated using criteria ranging from high to low. It should however be noted, that the GLVIA states that sensitivity of a landscape is linked directly to the proposed change.

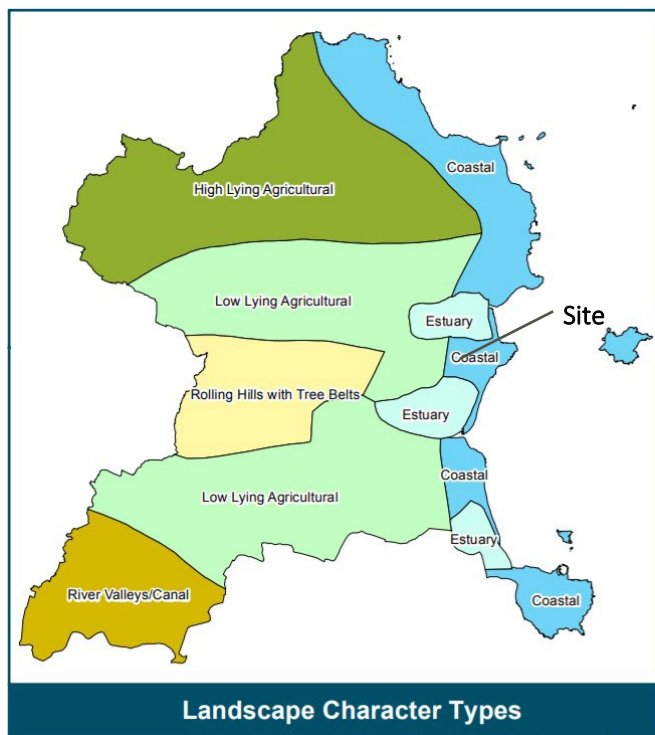


Figure 14.5 Landscape Character Types (excerpt of the Plan)

The site falls within an area characterised as 'Coastal' Landscape Character Type. This Landscape Character Type is of 'Exceptional' Landscape Value and of 'High' Landscape Sensitivity.

In relation to the Coastal Character type, the Development Plan states the following:

"The Coastal Character Type is categorised as having an exceptional landscape value. This value is arrived at due to the combination of visual, ecological, recreational and historical attributes. The area has magnificent views out to sea, to the islands and to the Mourne and Wicklow mountains and contains numerous beaches and harbours. The area's importance is highlighted by the High Amenity zoning covering substantial parts of the area. The area is rich in archaeological, architectural and natural heritage and is of high ecological value."

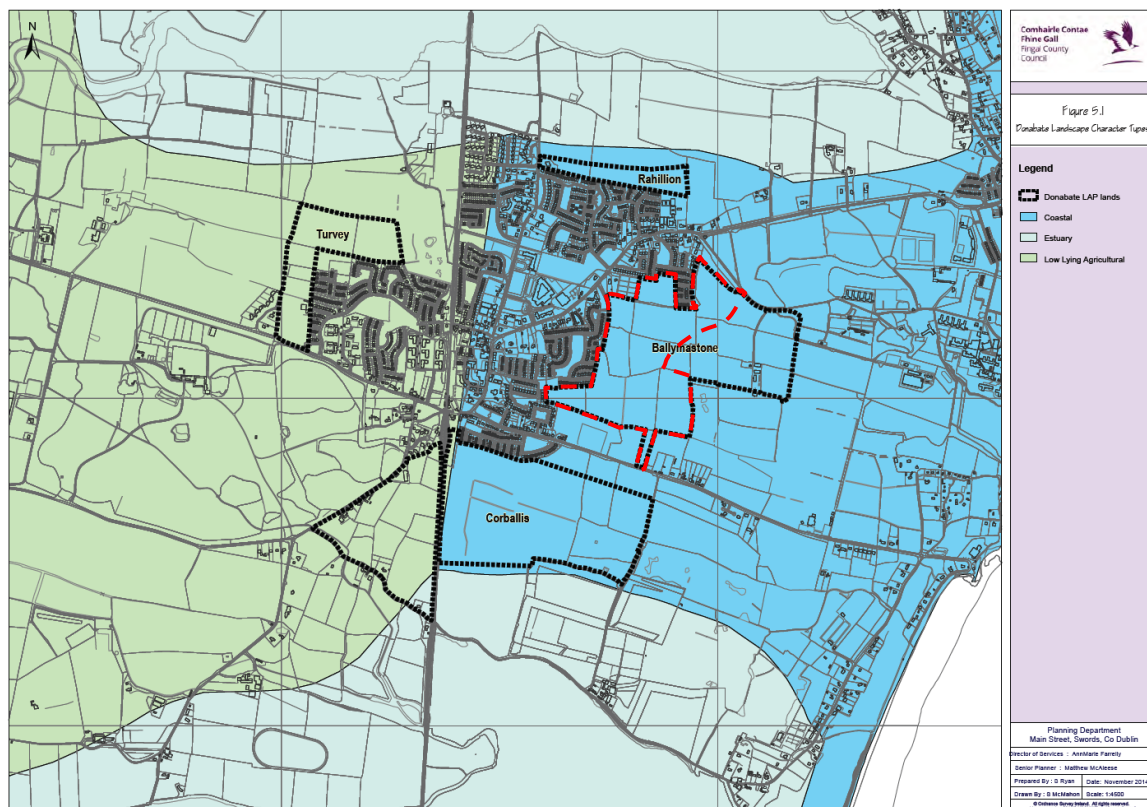


Figure 14.6 Landscape Character Type for Donabate and Surrounds (Extract from Donabate LAP 2016). The Masterplan lands fall within the Coastal Landscape Character Type.

Table 14.8 Landscape Character Assessment – *Fingal Development Plan 2023 – 2029*

Landscape Character Type	Landscape value	Landscape sensitivity
Rolling Hills	Modest	Medium
High Lying	High	High
Low Lying	Modest	Low
Estuary	Exceptional	High
Coastal	Exceptional	High
River Valley and Canal	High	High

Relevant policies and objectives in relation to landscape character are as follows:

- **Policy GINHP25: Preservation of Landscape Types:** Ensure the preservation of the uniqueness of a landscape character type by having regard to the character, value and sensitivity of a landscape when determining a planning application.
- **Objective GINHO55: Protection of Skylines:** Protect skylines and ridgelines from development.
- **Objective GINHO56: Visual Impact Assessments:** Require any necessary assessments, including visual impact assessments, to be prepared prior to approving development in highly sensitive areas.
- **Objective GINHO57: Development and Landscape:** Ensure development reflects and, where possible, reinforces the distinctiveness and sense of place of the landscape character types, including the

retention of important features or characteristics, taking into account the various elements which contribute to their distinctiveness such as geology and landform, habitats, scenic quality, settlement pattern, historic heritage, local vernacular heritage, land-use and tranquillity.

- **Objective GINHO58:** *Sensitive Areas: Resist development such as houses, forestry, masts, extractive operations, landfills, caravan parks, and campsites, and large agricultural/horticulture units which would interfere with the character of highly sensitive areas or with a view or prospect of special amenity value, which it is necessary to preserve.*
- **Objective GINHO59:** *Development and Sensitive Areas: Ensure that new development does not impinge in any significant way on the character, integrity and distinctiveness of highly sensitive areas and does not detract from the scenic value of the area. New development in highly sensitive areas shall not be permitted if it: " Causes unacceptable visual harm. " Introduces incongruous landscape elements. " Causes the disturbance or loss of (i) landscape elements that contribute to local distinctiveness, (ii) historic elements that contribute significantly to landscape character and quality such as field or road patterns, (iii) vegetation which is a characteristic of that landscape type and (iv) the visual condition of landscape elements.*

Views and Prospects

The Development Plan identifies views and prospects for protection. It notes that in assessing views and prospects it is not proposed that this should give rise to the prohibition of development along these routes, but development, where permitted, should not hinder or obstruct these views and prospects and should be designed and located to minimise their impact. The relevant policies and objectives are listed below:

- **Policy GINHP26:** *Preservation of Views and Prospects: Preserve Views and Prospects and the amenities of places and features of natural beauty or interest including those located within and outside the County.*
- **Objective GINHO60:** *Protection of Views and Prospects: Protect views and prospects that contribute to the character of the landscape, particularly those identified in the Development Plan, from inappropriate development.*
- **Objective GINHO61:** *Landscape/Visual Assessment: Require a Landscape/Visual Assessment to accompany all planning applications for significant proposals that are likely to affect views and prospects.*

Highly Sensitive Landscape

The site is identified to lie within an area designated as 'Highly Sensitive' landscape. The following policy is relevant:

- **Policy GINHP9 – Landscape Character:** *Ensure green infrastructure provision responds to and reflects landscape character including historic landscape character, conserving, enhancing and augmenting the existing landscapes and townscapes of Fingal which contribute to a distinctive sense of place.*

14.4.1.2 Donabate Local Area Plan 2016 – 2022 (extended to March 2026) – now lapsed

The Donabate Local Area Plan (hereafter referred to as the ‘LAP’) was prepared by Fingal County Council as part of the Development Plan 2016-2022. In March 2021, Fingal County Council resolved to extend the LAP until March 2026.

The LAP seeks to achieve the successful integration of the new development areas into the existing settlement and provide for the supporting infrastructure to ensure that Donabate continues to be a successful and attractive place for current and future residents. The LAP establishes a framework for the planned, co-ordinated and sustainable development of undeveloped lands zoned Objective RA – ‘Provide for new residential communities in accordance with approved local area plans and subject to the provision of the necessary social and physical infrastructure’. The LAP lands comprise approx. 138 hectares (340 acres) in four land parcels at Corballis, Ballymastone, Rahillion and at Turvey.

Strategic Aims of the LAP

The LAP is underpinned by a series of strategic aims as follows:

- *Provide a framework for a growing population with phased development of new housing delivered in tandem with supporting community and physical infrastructure.*
- *Support Donabate Village as the primary location for commercial, retail, community and cultural development serving the Town and Peninsula generally.*
- *Provide infrastructural investment to address traffic, pedestrian safety and movement challenges including the early delivery by FCC of a new road & bridge providing an alternative access to Donabate and Portrane.*
- *Protect and enhance the existing natural amenities of Donabate together with improving access to established local amenity areas through the creation of a network of designated green routes.*

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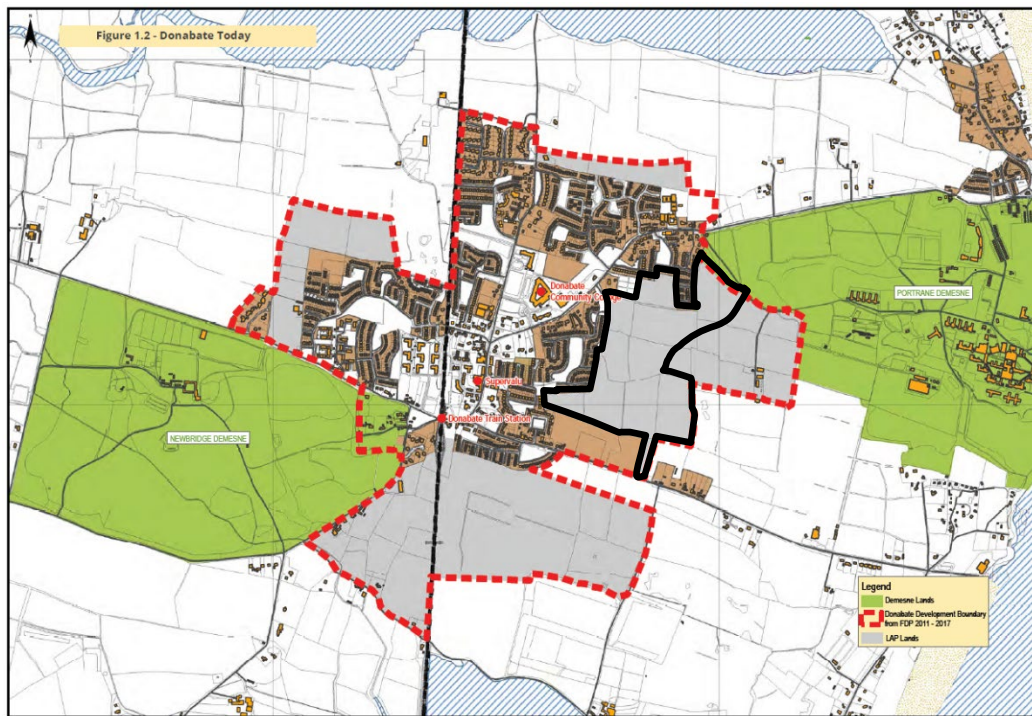
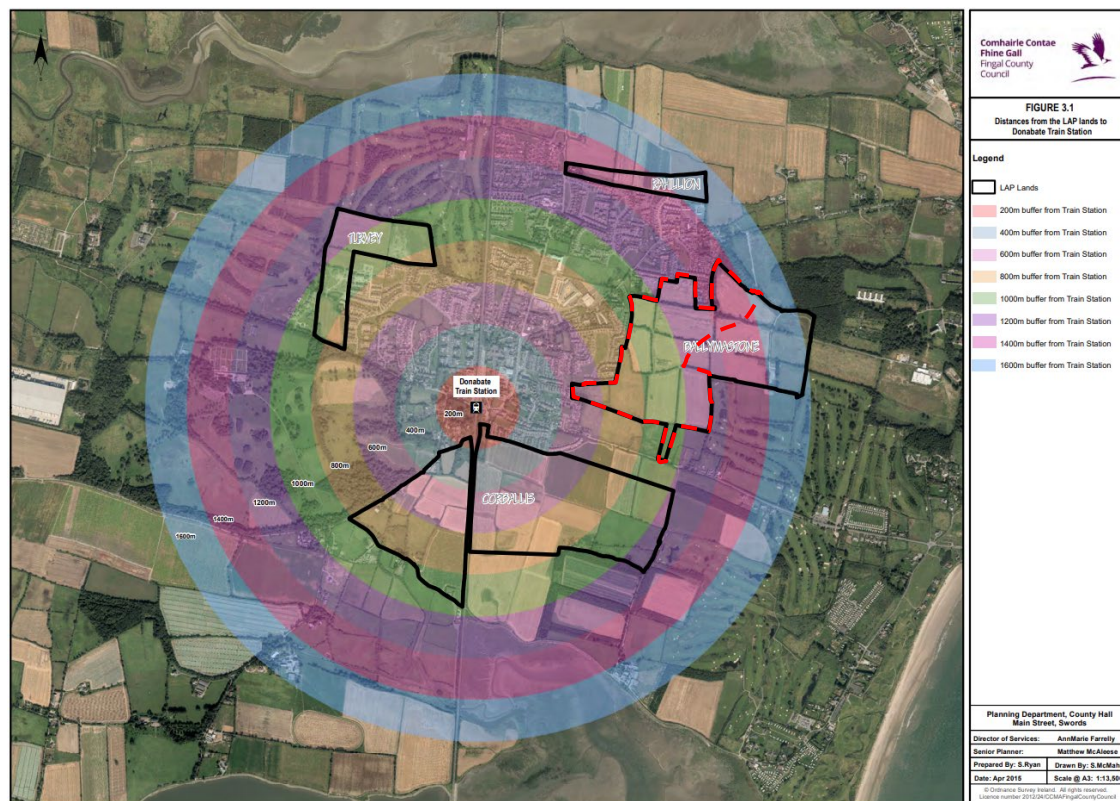


Figure 1.2 - Donabate Today

Figure 14.7 Extract from Donabate LAP (Figure 1.2), showing location of Ballymastone Masterplan lands (black line)



Distances from the LAP Lands to Donabate Train Station

Figure 14.8 Extract from Donabate LAP showing the distance from Donabate Train Station to LAP lands, with Ballymastone Masterplan lands outlined in dashed red

Figure 14.7, above, shows distances from the Ballymastone Masterplan lands to the Donabate Train Station. The subject site falls within the range of 800 – 1,400 m from the train station.

The following sections set out the objectives of the LAP that are of greatest relevance to the Proposed Development.

Open Space

The LAP sets out the desired hierarchy, accessibility and function of open space within the LAP lands. In relation to Ballymastone, the LAP envisages that Class 1 Public Open Space will be provided. In terms of the desired location and function, the following is stated (p. 41):

“Passive and Active recreation facilities including proposed all-weather pitch, sports clubs, athletic facilities, movement corridor, biodiversity conservation and enhancement, SUDS integration. Cycling and pedestrian linkages.”

Relevant objectives in relation to open space include the following (p. 42):

- **OBJECTIVE 4.6:** *Provide appropriately scaled children’s playground facilities and youth activity spaces within residential development, having regard to relevant Fingal County Development Plan policy, Department of Environment guidance and best practice.*
- **OBJECTIVE 4.7:** *To provide a large multi-functional playground at Ballymastone with a range of facilities to cater for a variety of age-groups (toddlers to teens).*
- **OBJECTIVE 4.10:** *Provide an integrated network of open spaces, pocket parks and pedestrian / cycle routes through the implementation of the Open Space Strategy outlined in the LAP.*

Landscape

The following objectives seeks to mitigate the impact of development proposals on landscape and ecology, with particular focus on the protection of existing vegetation, archaeology and sensitivities of ACAs, local landscape character areas, etc. (p. 56):

- **OBJECTIVE 5.1:** *Development proposals shall include Visual Impact Assessments and Landscape Impact Assessments demonstrating compliance with LAP landscape and heritage objectives, outlined hereunder.*
- **OBJECTIVE 5.3:** *Ensure development reflects and, reinforces the distinctiveness and sense of place of the landscape character types, including the retention of important features or characteristics, taking into account the various elements which contribute to their distinctiveness such as geology and landform, habitats, scenic quality, settlement pattern, historic heritage, local vernacular heritage, land-use and tranquillity.*
- **OBJECTIVE 5.4:** *Seek the protection and retention of trees, hedgerows and historic walls or other distinctive boundary treatments that contribute to the visual amenity and landscape character of the area.*
- **OBJECTIVE 5.5:** *Protect, preserve and ensure the effective management of trees and groups of trees.*
- **OBJECTIVE 5.7:** *Conserve the historic building stock, structures on the Record of Protected Structures and archaeological sites and features including those on the Record of Monuments and Places and their settings.*
- **OBJECTIVE 5.8:** *Positively enhance the character of the area taking full account of the relevant ACA Statements of Character.*

- **OBJECTIVE 5.10:** Any application for development on the LAP lands shall be accompanied by an Archaeological Impact Assessment.

Urban Design

In relation to urban design, the following objective of relevance to the Proposed Development is stated (p. 93):

- **OBJECTIVE 8.18:** Ensure that the interface between the proposed Donabate Distributor Road and all development abutting the road comprises only best practice urban design led solutions. In this regard no backing on of houses or house rear boundary walls will be permitted along the entire road alignment.

14.4.1.3 Summary of Planning Policy & Objectives

The above-discussed planning policies and objectives may be summarised as follows:

- The Phase 3 site is zoned as 'RA – Residential Areas'
- The Development Plan supports the principle of residential development while protecting and enhancing the coastal character of the area.
- Requirement for good Urban Design to contribute to Place Making in new developments.
- Requirements for open space provision and integration with Green Infrastructure.
- Recent construction of the Donabate Distributor Road to facilitate the development of Donabate and Portrane.
- General protection of trees, woodlands and hedgerows.
- Requirement for Sustainable Urban Drainage Systems not to be considered part of the Public Open Space System unless they contribute in a significant way to the design and quality of that space.
- The north-eastern portion of the application site lies within the Portrane Demesne Architectural Conservation Area (ACA) and Donabate and Portrane Historic Landscape Characterisation (HLC) Area, which provide for the safeguarding of archaeological sites, monuments, objects and their settings listed in the Record of Monuments and Places (RMP), and any additional newly discovered archaeological remains. Requirement to follow Table 14.24 to protect the character of the St Ita's ACA.
- The site is located within the 'Coastal Character Type' within wider Landscape Character Area and is categorised as a 'Highly Sensitive Character Type', requiring the preparation of a Landscape and Visual Impact Assessment.

14.4.2 Description of Receiving Environment

The existing site and its environs are described below in terms of:

- Wider environs; and
- The Proposed Development site and its immediate surroundings.

14.4.2.1 Wider Environs: The Donabate Peninsula

Donabate is in north Co. Dublin, located approximately 25km from Dublin City Centre and is approximately 11km north of Dublin Airport. It is 3km north-east of Swords, the administrative and commercial centre of Co. Fingal, which is one of four administrative units within Dublin Metropolitan Area. The Donabate peninsula is enclosed on the northern and southern sides by the Rogerstown and

Malahide Estuaries and by the village of Portrane, St. Ita's Hospital / Portrane Demesne and Donabate Golf Course to the east. Donabate Village is surrounded by agricultural, residential and recreational use and the town is well connected by road and public transport. Lands surrounding Donabate Village are zoned Greenbelt, High Amenity and Open Space. The Dublin-Belfast railway line cuts through Donabate Village and road access is from the M1 (via Hearse Road and Turvey Avenue).

The Donabate Peninsula features many important natural areas including the Rogerstown and Malahide Estuaries, which form part of the Natura 2000 network. Both Rogerstown and Malahide Estuaries are the subject of multiple national and international conservation designations, including Special Area of Conservation, Special Protection Area and Ramsar Site (international), Natural Heritage Area and Statutory Nature Reserve (national). These designations covers the wetlands, beaches and inshore areas, including parts of the Portrane Demesne and Newbridge House and Demesne. In addition, the extensive Newbridge House and Demesne is an important Regional Park located to the west of the existing village, while St. Ita's Hospital Portrane is located to the east of the village and north-east of the masterplan lands.

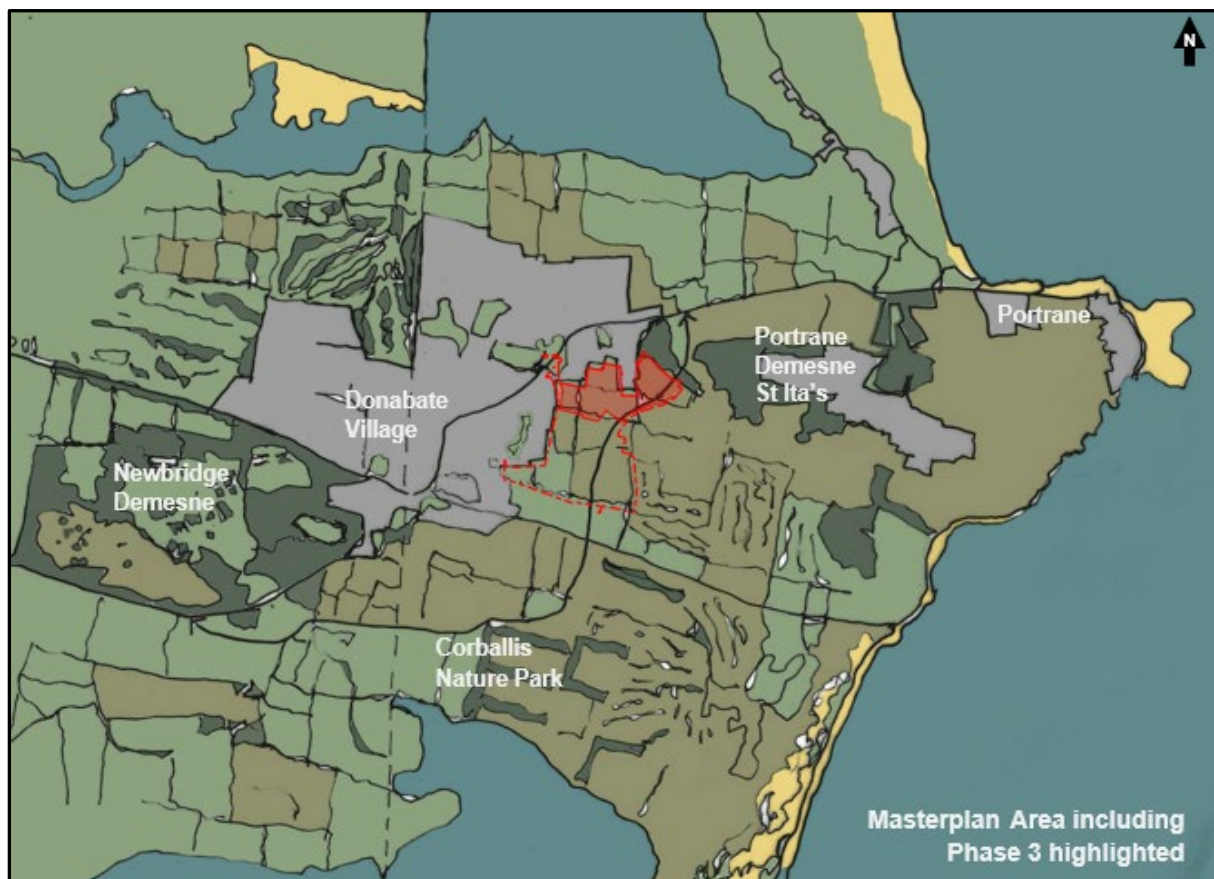


Figure 14.9 Proposed development site in the context of the Donabate peninsula

There are many local walking routes around Donabate, namely Newbridge Demesne Walks, Portrane Demesne Walks and the Donabate Portrane Cliff Walk. The Donabate Portrane Cliff Walk is a frequently used coastal walking route for locals and visitors. The 4km coastal walk starts from the Shoreline Hotel near Donabate Beach to Tower Bay at Portrane. The walk leads past impressive cliffs and offers views over the Irish Sea and Lambay Island.



Figure 14.10 Key location in Donabate peninsula

The photographs above in **Figure 14.9** illustrate the wider environs' rich natural and built heritage

14.4.2.2 Wider Environs: Historic Development



Figure 14.11 Rocque's map of the Donabate Peninsula, 1760, indicative Ballymastone Masterplan lands outlined in dashed red

Although there is evidence of human habitation in the area from the Mesolithic period onwards, the present urban structure began to develop around the medieval ecclesiastical foundation in Donabate townland, which was in existence by the early 13th century.

A thriving economy based on fishing and limestone quarrying fuelled a period of significant development in the 18th century. Margaret Gowan and Co. (2006) identified that Rocque's map of 1760 showed 'Donabate' as a small village clustered around the area of the medieval core, "the cross of Donabate" marked at the centre of the settlement (**Figure 14.10**). The nearby manors and estate lands of Turvey and Newbridge, as well as the houses of Beaverstown and Corballis are shown on roads and avenues leading into the village.

The town underwent further significant change with the construction of the Dublin-Belfast railway line in the mid 19th century. The 1843 Ordnance Survey six-inch map (**Figure 14.11**) shows the newly constructed railway running north-south through the peninsula. The map identifies Donabate village to the west of the line and Ballisk village to the east. By this stage the alignment of the road through the village (now the R126) was also established. In 1903, St. Patrick's Catholic Church, now the recognised centre of the modern town, was built beside this road.

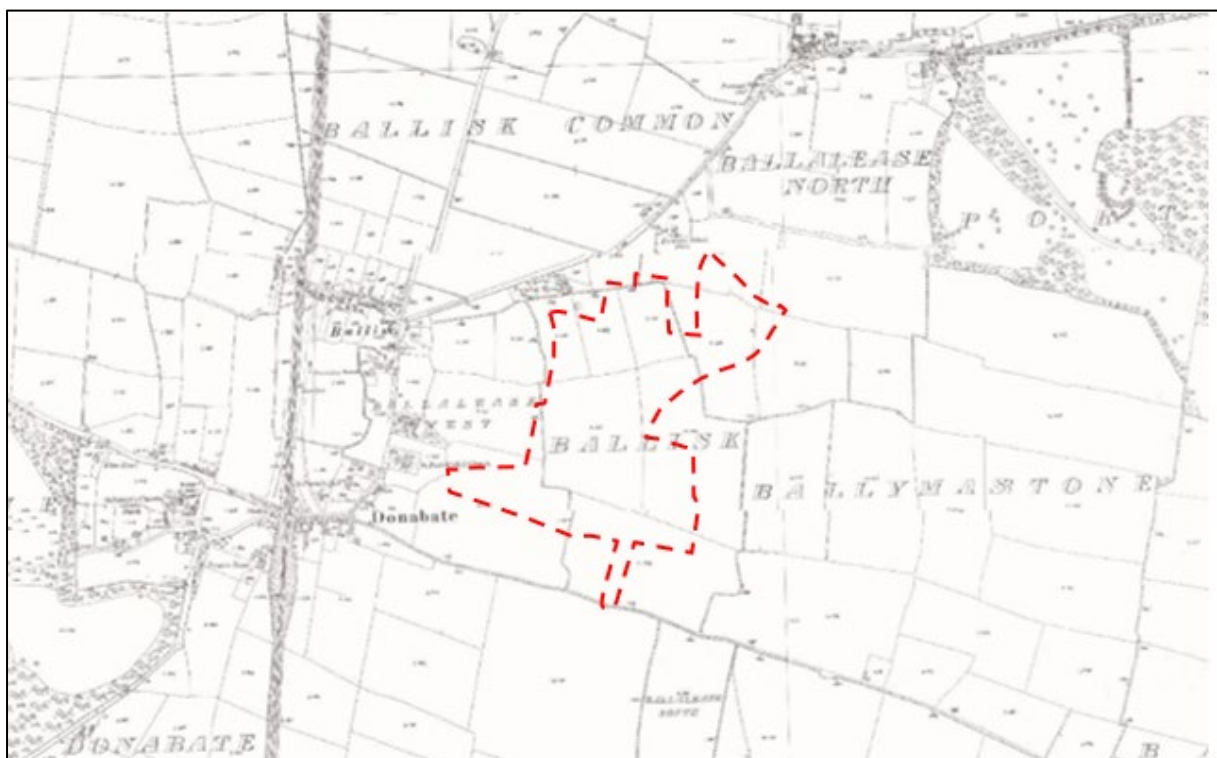


Figure 14.12: Ordnance Survey 1897-1913 25" Map of Donabate, with Ballymastone Masterplan lands outlined in dashed red

14.4.2.3 Wider Environs: Built and Cultural Heritage

The Donabate area and settlement dates back to prehistoric period. Therefore, there are a number of Protected Structures in Donabate. There are two 'Architectural Conservation Areas' designated on the Donabate Peninsula. Newbridge Demesne and The Square ACA borders west of the town. St Ita's Hospital and Portrane Demesne ACA lies north-east of Ballymastone. The Phase 3 site and the masterplan lands partly lie within the Portrane Demesne ACA **however there are no built elements**

within the site and the only upstanding features of the ACA are enclosing woodlands to the northern and western boundaries, and there is no visual relationship with the core buildings of the ACA and much of the ACA lands.

There are no recorded monuments within Phase 3 planning application boundary.

14.4.2.4 The Site & Immediate Environs

The site is located to the east of the existing Donabate Village. The Masterplan area is situated between Donabate Village and Portrane Demesne (St. Ita's Hospital). The DDR splits the Masterplan area into eastern and western sections.

To the west and north of the Masterplan area there are existing residential developments and a local cemetery. To the east is the Donabate GAA Club and Donabate Golf Club. To the south, lies a new residential development on the corner of New Road. Further south is the New Road which connects Donabate Town to the Coast.

The Phase 3 (Proposed Development) lands comprises the northern section of the overall masterplan. To the south of this Phase 3 Proposed Development is the permitted Ballymastone Phase 2 development and further south and south-east is the permitted Ballymastone Phase 1 development, both under construction. To the east of the site is the DDR. Existing residential areas to the west (the Links) and north (Priory Woods and Willowbrook) of the site and masterplan lands. The Donabate Burial Ground is north-west of the Proposed Development site.

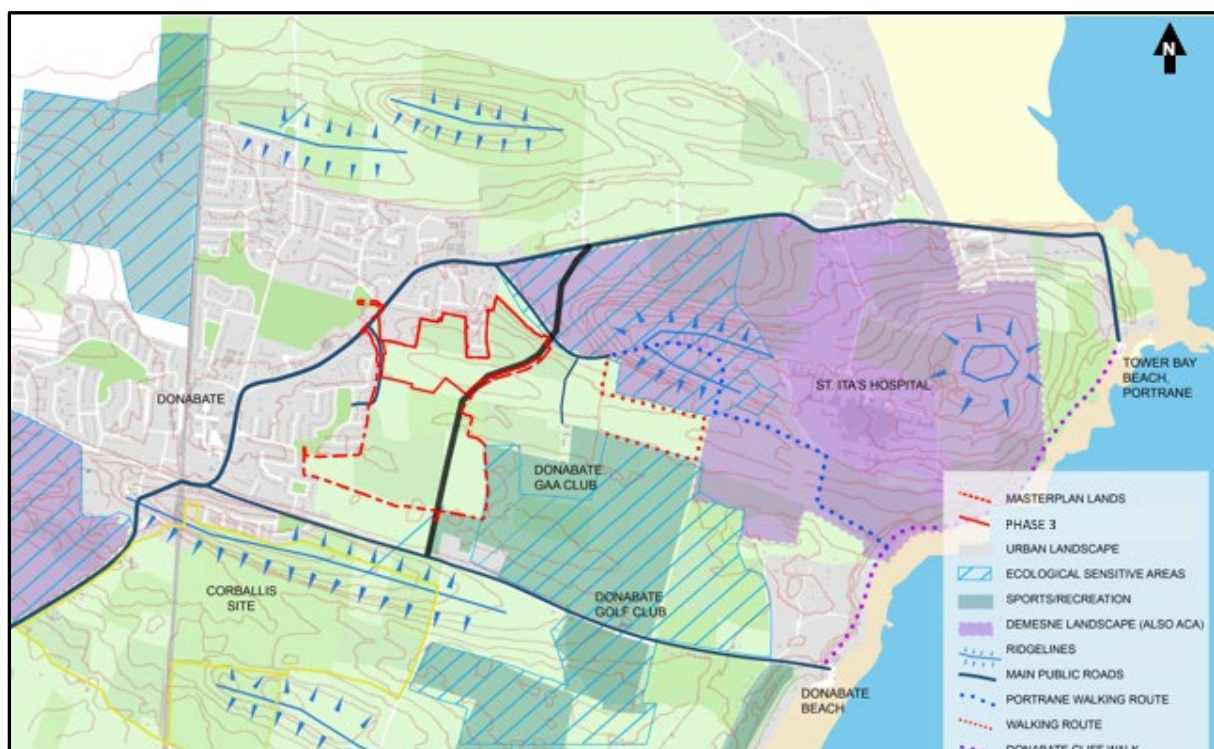


Figure 14.13: Proposed development site context



Figure 14.14: Key characteristics of the local landscape / townscape at Donabate

The photographs in **Figure 14.13** above and **14.14** below, above, illustrate the key characteristics of the local landscape / townscape, particularly the village qualities of Donabate – its landmarks, historic features and Demesne, green and leafy neighbourhoods and residential areas where the village abuts the western boundary of the site and, to the east the Donabate Distributor Road (DDR) and permitted (not yet constructed) Recreational Hub.



Figure 14.15: Key characteristics of the local landscape / townscape at Donabate

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The immediate environs to the Phase 3 site illustrate a receiving environment in transition in accordance with agreed zoning and permitted planning schemes. The main features include the DDR itself built to service these lands, the Phase 1 and 2 permitted schemes now at an advanced stage of construction both east and west of the DDR, and other developments fronting onto New Road.

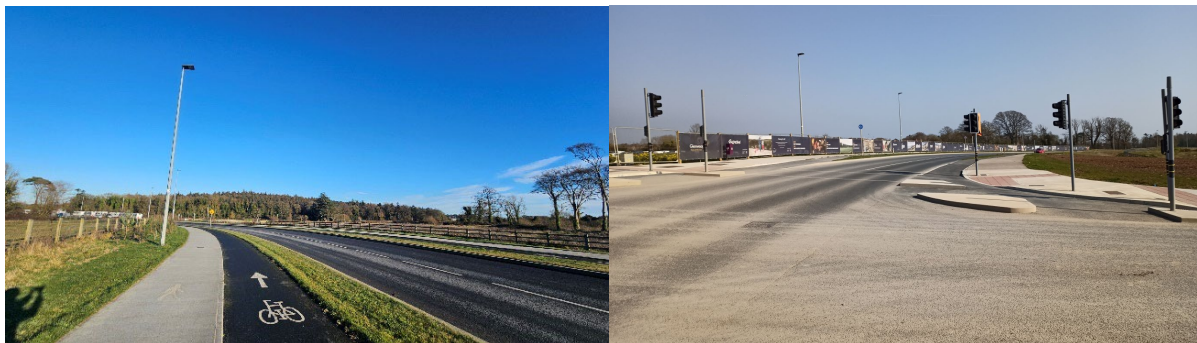


Figure 14.16: The landscape can be described as an area in transition; views of the surrounds nearest the site lands from the DDR



Figure 14.17: Permitted development to the south of masterplan lands, north of New Road and west of DDR.



Figure 14.18: Views of Masterplan lands (Phase 1); (left) Phase 1 occupied houses to west of the DDR, and (right) Phase 1, to the west of DDR under construction.

14.4.2.5 The Masterplan and the Phase 3 Site: Field Patterns

The 32ha overall masterplan area was made up of some 14-16 fields, previously used for agricultural purposes. Phase 1 is now substantially developed and Phase 2 underway. The Phase 3 site comprises 4 northern most fields of the masterplan and have been partly affected by materials and excavations associated with Phases 1 & 2.

The agricultural field pattern of the overall area was present since before 1837 (almost 200 years). Remaining hedgerows have the potential to provide rich, wide and well-established wildlife corridors. They also add a sense of maturity to the landscape. There are a few fine examples of specimen trees around the site in adjacent woodland blocks. The specimen trees add character to the landscape and contributes towards visual amenity. See **Figure 14.18** below that highlights the historical hedgerows within the site.

Outside the Masterplan boundary, to the east of DDR, several of the hedgerows have significant rows of mature trees. Most of these are Ash. Towards the north-east of the masterplan area and Phase 3 site, the boundaries of several fields, which are shown on historic maps to have been part of the Portrane Demesne, include a greater variety, and more mature trees. Some of these are monumental in stature.

The following extract is taken from Margaret Gowan and Co.'s report on the Site, prepared in 2006 to inform the LAP (p.41-43): *"The townland boundary between Ballymastone and Portrane Demesne, Ballalease North and Portrane Demesne, between Ballalease North and Ballisk Common, Ballalease North and Ballymastone, Ballymastone and Ballisk are intact within the Ballymastone Lands. Townland boundaries are one of the earliest formal land divisions and are unique to Ireland. Their origins are undoubtedly of great antiquity, most certainly pre-Norman. They existed well before parishes or counties... Townland boundaries can be integrated into developments, however if some or all are to be removed they should be appropriately recorded (their nature and composition established) during archaeological site investigations".*

The masterplan lands were characterised by a relatively unchanging agricultural field pattern of hedgerows and tree rows and woodland copses or clusters that are also legible on historic maps. With ongoing construction in Phases 1 and 2 this is now no longer legible.

Hedgerows have been removed in the wider area in accordance with permitted developments. The most significant trees lie to the north-east masterplan / site boundary and west of the DDR and east of Priory Wood neighbourhood – an area where they impart an attractive wooded character.

The Phase 3 lands occupy the northern part of the overall masterplan lands, see Figure 14.18 and are typical of the wider Masterplan landscape, however there are significant individual trees and woodlands within the site.

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Environmental Impact Assessment Report (EIAR) Addendum

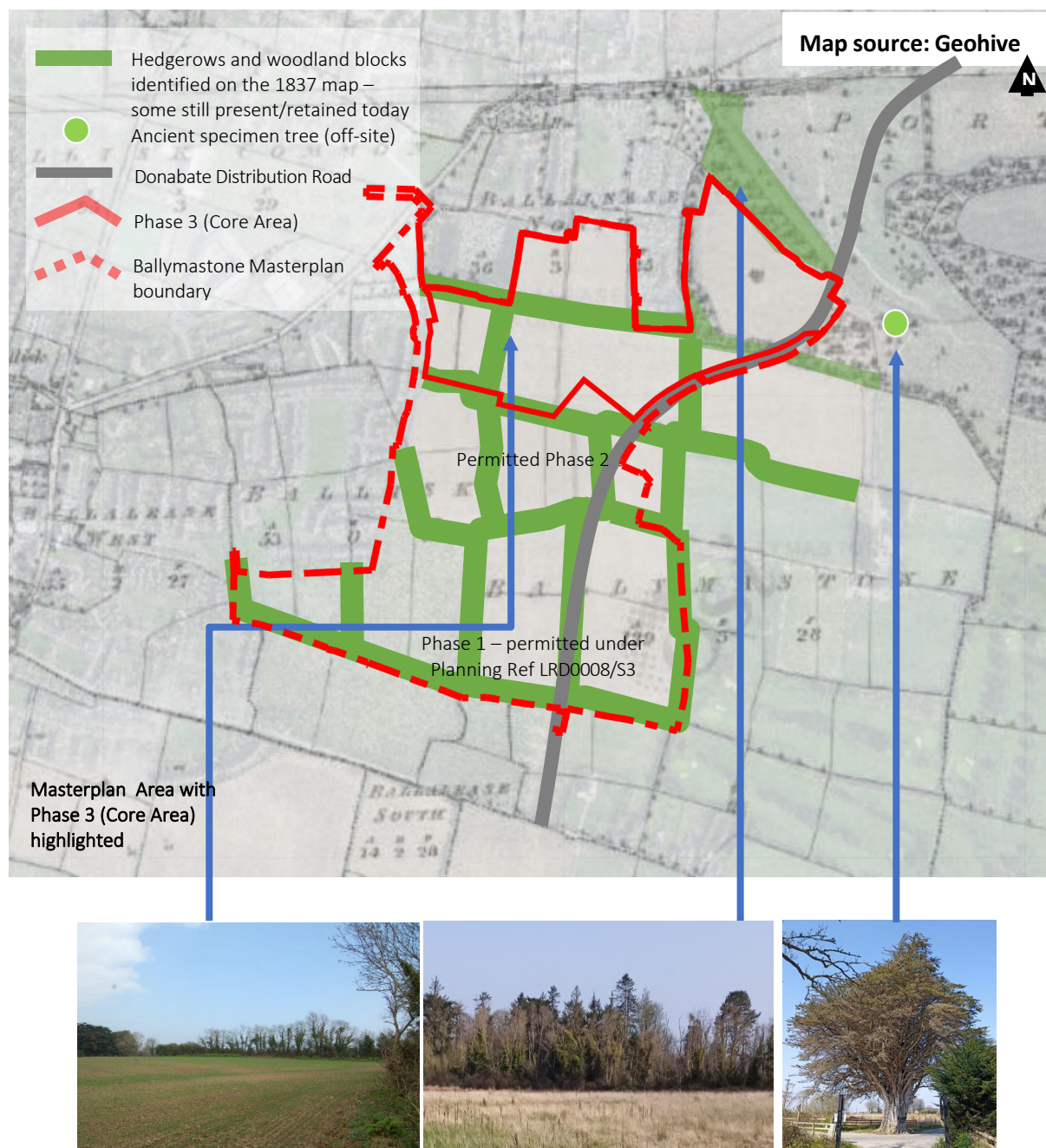


Figure 14.19: Hedgerows, historic townland boundaries, trees and woodlands

14.4.2.6 The Masterplan and the Phase 3 Site: Field Boundaries & Trees

Some of the original hedgerows have been retained across Phases 1 and 2 as part of open space network. The hedgerows are made up of a typical combination of species, primarily Hawthorn and Ash, and an abundance of Ivy. Further hedgerows are present in Phase 3 particularly to the perimeter.

The quality of the hedgerows is variable. Some are more mature and these provide significant habitat features and a high degree of visual enclosure in the landscape. Others are less mature or have suffered from poor maintenance, and have less value as habitat and landscape features.



Figure 14.20 Views showing the variable quality of hedgerows on site's northern ends – graveyard trees to NW end, N to rear of Priory Wood houses, and NW site bounding Priory Wood

The Phase 3 (Proposed Development) lands occupy the northern part of the overall masterplan lands see **Figure 14.18** and are typical of the wider Masterplan landscape. In Phase 3, there are three internal existing hedgerows; 2 no. hedgerow running east-west and a hedgerow running north-south within the site. The site's northern boundaries are enclosed by a variety of hedgerows and tree lines including tall coniferous trees adjoining the graveyard boundaries and deciduous hedgerow with trees running along the rear/side of houses within Priory Wood. To the north-east the boundary is enclosed by a woodland running along the east of Priory wood and around to the site's northernmost edges, containing a mix of mature deciduous and conifer trees, once part of the Portrane Demesne woodlands, and remain clearly visible from along the DRR to the east. They are all part of an interconnected hedgerow system as shown in **Figure 14.18**.

The scheme layout retains existing hedgerows where feasible as part of the open space system, however some will be removed to facilitate the development. The retained hedgerow forms a part of the central linear open space and maintains connectivity with other retained hedgerows in Phase 3 and the wider masterplan lands.

14.4.2.7 The Masterplan and the Phase 3 Site: Topography & Drainage

The Masterplan lands' topography lacked any distinctive features; with there are gentle undulations across the site of approximately 2m. It is generally low-lying and flat, but rises gradually towards the north-east i.e. the site. However this has been significantly altered through development work to date in Phases 1 and 2 and significant new buildings. The northernmost fields of Phase 3 can be considered part of the foot-slope of the ridge on the neighbouring St. Ita's Hospital lands. A shallow linear basin, aligned east-west in keeping with the prevailing topography of the peninsula, can be perceived in the northern portion of the subject site at the base of the ridge mentioned above.

There are no streams or rivers on the site; the natural drainage pattern has been disturbed by the improvement of the lands for agriculture and subsequently by development.



Figure 14.21 The presence of bulrushes, sedges and wet grassland located within the far northeastern lands of Phase 3 site are indicative of underlying wet ground

14.4.2.8 The Masterplan, the Phase 3 Site and Environs; Landscape and Visual Amenity

A number of features of the surrounding landscape are prominent in views from the Masterplan lands and Phase 3 site, lending it context/legibility and positive character:

Towards the east, the wooded ridge of Portrane Demesne (now St. Ita's Hospital lands) and some remnant demesne trees (east of the distributor road) generate a high degree of visual enclosure and positive landscape character and views. Also partially visible are the steeply pitched roofs of St. Ita's Hospital buildings that protrude above the wooded ridgeline.



Figure 14.22 The wooded ridge of Portrane Demesne is prominent to the east from parts of the site To the west, north and south, the masterplan borders on various low density residential estates. In most cases, the rear or side facades of the houses and properties are visible from the site. As a result

the views are (sub)urban in character and of limited quality and significantly compromised by works in progress in permitted Phases 1 and 2.



Figure 14.23: Views of surrounding established housing in the background (a) Priory Wood against the site's northern boundary and (b) The Links to the west of site as visible from the DRR. Ongoing Development works dominate the foreground.

Views towards other prominent features like Spires and Local Landmarks. In views from the northern portion of the masterplan site and particularly from Phase 3, the church spire can be partially seen to the west, indicating the direction of the town centre.

From the western portion of the site, the distinctive red brick school (now converted for residential use) is partially visible.



Figure 14.24: (left) Views from the Site to the west towards looking at the Spire and village, (right): Red brick school (now residential use)

14.4.2.9 The Masterplan and the Phase 3 Site: Visibility

The most visible areas of the Phase 3 site are located in or along the:

- Immediate western edge – The site is clearly visible from The Links neighbourhood; and
- From DDR - The DDR splits the overall Masterplan area and Phase 3 (Proposed Development) lands to the west are clearly visible from the DDR.

Partial visibility can be afforded from:

Ballymastone LRD Phase 3

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- Priory Wood – the site is partially visible from the Priory Wood neighbourhood, generally where there are gaps in the vegetation.
- New Road - Phase 3 lands are barely visible from New Road, and visibility will be further reduced once Phase 1 and 2 are completely constructed.
- Corballis Ridge - The steep Corballis ridge directly south of New road, partly under construction of residential development (reg. ref: LRD0017/S3), and partly undeveloped lands but zoned for residential development affords panoramic views of the masterplan area and the distant Phase 3 site. This visibility to Phase 3 is reducing with the intervening development of Phases 1 and 2.
- Local Walking Route - There is a local walking trail connecting the DDR to Ladies Beach along the coast through the Portrane Demesne. The topography raises up and forms a ridge. There are gaps in vegetation at higher elevation where views of the village, Phase 3 site and masterplan area are partially visible.
- Portrane Demesne ACA – although part of the Phase 3 lands (the northern field) lies within the Portrane Demesne (St Ita's) ACA, it is segregated visually by enclosing boundary woods and physically by the DDR.

14.4.3 Relevant Planning History of the Environs

A number of permitted and Proposed Developments in the vicinity of the Proposed Development site are listed in Table 22.1 (Chapter 22 Cumulative Impacts) of this EIAR and same is highlighted below.

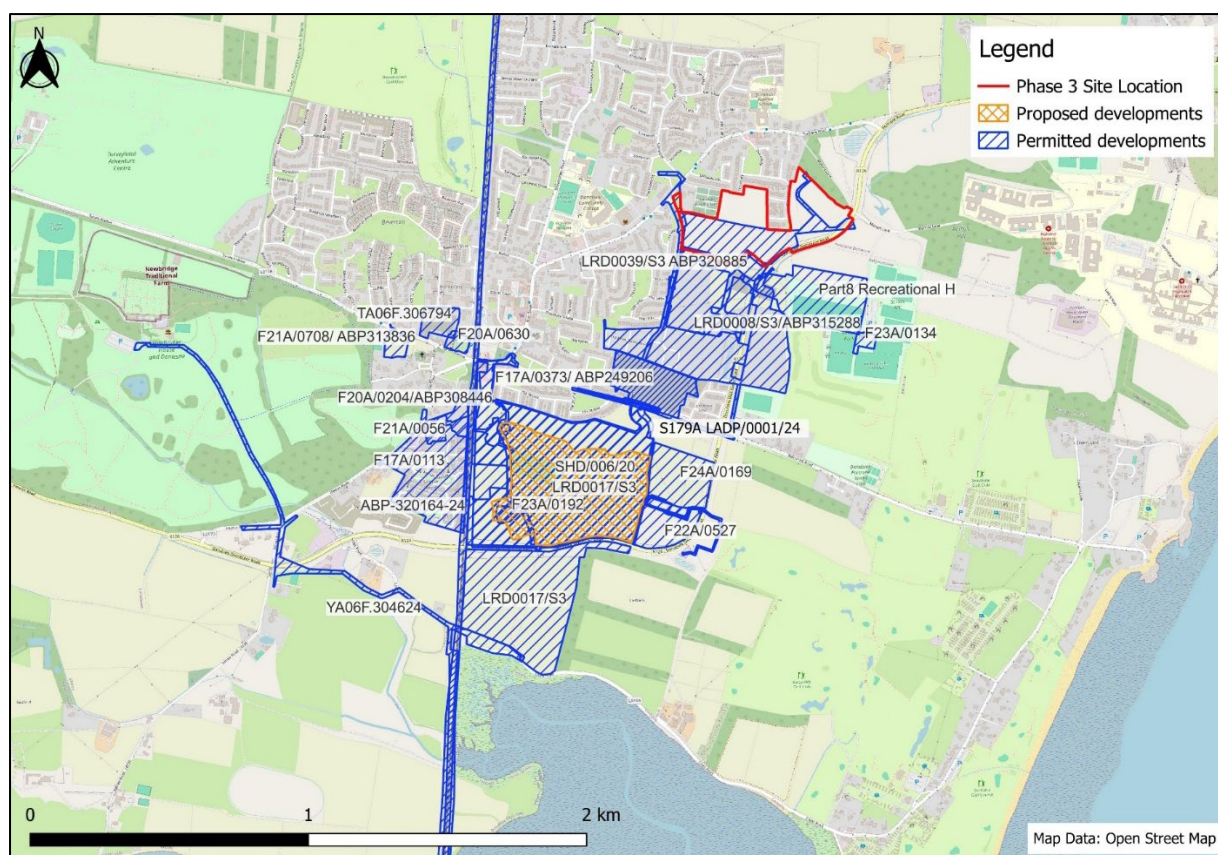


Figure 14.25: Permitted and Proposed Developments in the vicinity of the proposed site

The transition of the area has already begun. This would reflect the change on the proposed lands and as permitted (Phase 1 & 2) and potential future development in the wider LAP lands. The Ballymastone Phase 1 development is nearing completion (Planning Ref LRD0008/S3). The lands immediate south of the masterplan lands and north of New Road, there are two planning applications granted for residential development (reg. ref: F17A/0373 and F20A/0510). The planning permission reg. ref: F20A/0510 has been implemented and F17A/0373 is under construction. The permitted Recreational Hub (Part 8) lies to the east of masterplan lands and to the east of the DDR. Planning permission has been granted for a large scale residential development (reg ref: LRD0017/S3), to the south west, for 1,020 no. units, among other developments, and this is now underway.

These changes are all part of policy to deliver an expanded urban area of Donabate to the east and along the newly established DDR corridor. Currently these lands are in a state of transition awaiting change. The cumulative effect of all these changes will be transformational and see the semi-urban current landscape become urban with planned amenities, landscaped streets, and a variety of housing styles and materials. A new place/landscape /townscape is being created here.

14.4.4 Summary of Landscape Characteristics and Values

The above sections explored the policy and objectives for the site, provided a detailed description of the receiving environment in terms of context, history and landscape and visual characteristics. The landscape characteristics and values of the site and receiving environment may be summarised as follows:

- Donabate is situated on a peninsula on the coast to the north of Dublin City. Although within the Dublin Metropolitan Area, Donabate is separated from the continuous urban structure of Dublin City; it exists as a defined urban area surrounded by countryside / open space.
- Surrounded by water on three sides (the Irish Sea and Rogerstown and Malahide Estuaries) and characterised by mature hedgerows and woodlands, the peninsula has high conservation value, confirmed by multiple national and international designations.
- The woodlands in the surrounds are associated with two historic demesne landscapes, Newbridge and Portrane (now St. Ita's Hospital). **These woodlands to the north and north-east separate the site from a visual and close physical relationship with the core Portrane Demesne buildings and features that have informed its ACA status.**
- The combination of agricultural, recreational and conservation usage lends the landscape of the Donabate Peninsula a rural/coastal character, which is only enhanced by its metropolitan location / context.

14.4.4.1 Conservation Values

These are values to be conserved and indicate those aspects of the receiving environment which are of value and is sensitive could be negatively impacted on by the Proposed Development.

- Protection or enhancement of highly sensitive Coastal landscape character type.
- Sensitivity of the Architectural Conservation Area (in which part of the application site lies) and archaeological features on masterplan lands.
- Landscape resource and elements – historical townland boundaries, historical field boundaries, matured hedgerows, trees and ditches.

- The green interface between existing communities and new developments with the site in terms of views, boundary treatments and character.
- The contribution of the remaining rural and green characteristics of the site to the scenic qualities of the area.

14.4.4.2 Enhancement Values

The values to be enhanced represent the site's capacity to accommodate change. These include:

- Extensive policy, objectives and actions underway for Donabate as a 'Self-sustaining Growth Town' within the Dublin Metropolitan Area resulting in the lands changing from rural/agricultural to urban;
- Zoning of lands for residential development in the development plan and guidance provided by Donabate LAP;
- Objectives to support compact, well-connected, high-quality urban development with a strong sense of place;
- The site's location on the edge of an urban area and partially developed urban landscape / area in transition.
- Recent construction of the DDR to facilitate development;
- Recent permissions in the general environs as the LAP is progressed;
- The visual and physical connection/proximity from the Masterplan lands and the Phase 3 site in particular to Donabate and its amenities and infrastructure;
- Limited accessibility and diversity of the lands as private agricultural fields.
- Currently, the masterplan lands including parts of the application site are disturbed and partly cleared for construction of Phase 1 and Phase 2 developments which are progressing and for Phase 1 nearing completion on site.

The enhancement values reflect change that is occurring in the landscape and its inherent robustness – this includes the site's location on the edge of an urban area.

14.5 Predicted Landscape Impacts

The sites enhancement values (as set out in **Section 14.4.4**, above) reflect a body of policy that is supportive of landscape change at this location (and its environs) as part of general town expansion of Donabate as a self-sustaining growth town, and change that is already underway.

The site's conservation values (as set out in **Section 14.4.4** above) predominantly reflect the core elements of the local architectural, heritage and landscape designations and the landscape resource.

Overall, the impact of the Proposed Development is the change of the site from its current agricultural lands (albeit lands that are currently under-utilised and neglected), and in places partly disturbed / developed, to a high-quality residential neighbourhood.

14.5.1 Landscape Sensitivity

The Proposed Development directly affects the physical character of:

- LCA – Coastal Character Area; and
- The immediate environs of the Proposed Development site.

14.5.1.1 Coastal Landscape Character Area

The Coastal LCA (including the Portrane Demesne ACA) is classified to have ‘Exceptional’ Value and ‘High’ Sensitivity, i.e. *areas where the landscape exhibits a very strong, positive character with valued elements, features and characteristics that combine to give an experience of unity, richness and harmony. The character of the landscape is such that its capacity for accommodating change in the form of development is very low. These attributes are recognised in landscape policy or designations as being of national or international value and the principle management objective for the area is protection of the existing character from change.*

14.5.1.2 The immediate environs of the Proposed Development site

The subject site and the receiving environment were explored and detailed in **Section 14.4.2**, above. The landscape resource of the subject site contains some valued elements, features or characteristics in the form of hedgerows, trees and ditches.

The site and environs are zoned for residential development. There are extensive policy objectives for compact and sustainable residential development at this site in the development plan and the Donabate LAP.

The subject site is located in the fringes of existing urban areas to the west and north, and acts as a transition area from the urban landscape to the coastal landscape. The site lies north of the permitted and under construction Phase 2 lands. The Phase 1 lands are under construction and nearing completion. The subject site, therefore has an evolving character reflected in the DDR road and is in transition from rural to urban. The site lies low compared to the wider landscape area and, as such, long distance views of the site are limited, which reduces the visual sensitivity.

The landscape sensitivity of the subject lands is classified as ‘Medium’, i.e. *areas where the landscape has certain valued elements, features or characteristics but where the character is mixed or not particularly strong or has evidence of alteration to / degradation / erosion of elements and characteristics. The character of the landscape is such that there is some capacity for change in the form of development. These areas may be recognised in landscape policy at local or county level and the principle management objective may be to consolidate landscape character or facilitate appropriate, necessary change.*

A review of the extent to which the Proposed Development will affect the views experienced from adjacent landscapes is carried out in **Section 14.6**, below.

14.5.2 Construction Phase

The construction phase of the Proposed Development will result in ongoing infrastructure, building and related works for approximately 36 months, as phased. This will entail:

- The removal of some hedgerows and trees and the protection of retained hedgerows and trees on site, where applicable – See Arboricultural Impact Assessment & Method Statement by John Morris September 2025.
- The temporary movement and stockpiling of earth and materials.
- The temporary movement of machinery in and out of the site.

- All engineering, building and landscape works required with associated site infrastructure, fencing and plant.

For the purposes of assessment the Construction Phase Impacts are categorised as **Short-term**.

14.5.2.1.1 Construction Effects on the Landscape: Coastal Landscape Character Area (High Sensitivity)

The effects during construction would affect a small geographical extent of this LCA and an area that is not directly linked to the coast itself. During construction, it would introduce elements that are uncharacteristic of the LCA in a small geographical area resulting in minor change to the LCA and also a minor change to the Portrane Demesne ACA. The predicted magnitude of change is 'low'.

This will result in an effect of 'slight to moderate significance'.

Overall, the predicted impacts are **short term** and **adverse** in nature.

14.5.2.1.2 Construction Effects on the Landscape: The immediate environs of the Proposed Development site (Medium Sensitivity)

The effects during construction would be intensive across the Phase 3 site and immediate environs. The magnitude of change would be 'high', resulting in the loss of agricultural land and some hedgerows across the site. The northernmost field, part of the ACA would see the field cleared and construction work carried out, but enclosing trees and woods would remain, retaining the structure of the ACA landscape whilst new building occurred. Whilst the site and environs is already changed by ongoing adjacent development, this would change the character of the landscape and generate a landscape effect that would be 'significant'.

Qualitatively, it is expected that all construction works would have an **adverse** landscape impact. Although valued features would be protected, the works would change and degrade the lands until they are re-made into the proposed neighbourhood.

The construction works are expected to take up to 36 months and, therefore, are considered as **short term** in duration.

14.5.3 Operational Stage

The site's enhancement values (as set out in **Section 14.4.4**, above) reflect a significant body of policy that is supportive of major landscape change at this location to form a new residential community. Despite its attractive rural qualities, the site is currently surrounded by landscape change and the urbanisation of its setting – it is an area in transition and increasingly an anomaly in this context. Nonetheless, it offers attractive characteristics to contribute to this new environment (reflected in its conservation values, as set out in **Section 14.4.4**, above).

The impact of the Proposed Development would be the change of the site from partly open agricultural landscape and lands to a new residential and urban neighbourhood. Locally, some trees and hedgerows will be affected; however, the Proposed Development has been laid out to incorporate many of these existing landscape 'green infrastructure' features within its landscape structure of open spaces and networks, particularly those which form part of the landscape structure of the Portrane ACA.

The Proposed Development has been prepared in accordance with best practice national and regional guidelines and policies, including the *Fingal Development Plan 2023-2029*, the Sustainable Residential

Development and Compact Settlement Guidelines for Planning Authorities (2024) and the ‘Design Manual for Urban Roads and Streets’ (Department of Transport, Tourism and Sport & Department of Housing, Planning and Local Government, 2013). The proposed Masterplan development has been laid out to reflect existing landscape features such as topography and urban grain. The Phase 3 site layout has been sensitive to the landscape elements of value on the site, incorporating them into the development, adding value to them and enhancing their role. The site layout incorporates new landscape elements within the building cluster, contributing positively to the local streetscape and residential amenity for new and surrounding residents and reflecting best practice place making and green infrastructure delivery.

The effects of this, in terms of alteration of the landscape character, are assessed below.

14.5.3.1 Operational Effects on the Landscape: Coastal Landscape Character Area (High Sensitivity)

The effects of the Proposed Development at operation would affect a limited geographical extent of this LCA **and an isolated field of the Portrane Demesne ACA**. The Proposed Development, in general, complements the scale, landform and pattern of the landscape and townscape in most places and is also in keeping with relevant policy objectives. Change is relatively limited in scale resulting in minor alteration to the landscape as the existing urban area incrementally extends further east with localised change to the overall Coastal LCA and its purpose.

The magnitude of change would be **low** relative to the whole LCA.

The effect would be of **slight to moderate significance**.

This would occur over the **short, medium and long term**.

Qualitatively, the effect would be **neutral** i.e. *Scheme complements the scale, landform and pattern of the landscape (townscape) / view and maintains landscape quality.*

14.5.3.2 Operational Effects on the Landscape: The immediate environs of the Proposed Development site (Medium Sensitivity)

The Proposed Development would impact the full extent of the site, resulting in the loss of the agricultural land and consolidation of development. The proposal would extend residential development into the landscape, which, although may be new and prominent, is not uncharacteristic of the area. The Proposed Development achieves local policy objectives of Fingal County Council and is in keeping with local land use zoning. Its scale and effect would be transformational along the edge of Donabate and the DDR, but important to be so, in order to contribute to local place-making. **The northernmost field, an isolated part of the ACA would retain enclosing trees and woods, keeping the structure of the ACA landscape, whilst adding value to the new neighbourhood developed within.**

The magnitude of effect would be **High** i.e. *Change that is moderate to large in extent, resulting in major alteration to key elements features or characteristics of the landscape and/or introduction of large elements considered uncharacteristic in the context. Such development results in change to the character of the landscape.*

The effect would be **significant**.

This would remain over the **short, medium and long term**.

Qualitatively, the effect would be **beneficial** i.e. *Scheme improves landscape (townscape) / view quality and character, fits with the scale, landform and pattern*

14.5.3.3 Summary of Effects on the Landscape

The Proposed Development is expected to have a **short term adverse** effect on the landscape resource during construction.

Upon operation and into the future, the development would have a **low to significant** (depending on proximity) and **neutral to beneficial** effect on Phase 3 and its immediate setting and on the wider landscape resource.

14.5.4 Cumulative Impacts

A number of permitted and Proposed Developments in the vicinity of the Proposed Development site are listed in Table 22.1 (Chapter 22 Cumulative Impacts) of this EIAR and same is highlighted in **Section 14.4.3** above.

Cumulative Effects during Construction Phase

The **cumulative magnitude of change** would be '**Very High**', i.e., *Change that is large in extent, resulting in the loss of or major alteration to key elements, features or characteristics of the landscape and/or introduction of large elements considered totally uncharacteristic in the context. Such development results in fundamental change in the character of the landscape.*

The **cumulative effect** would be **Significant to Very Significant**, depending on the proximity to the change and stage of development. Qualitatively the landscape effect is **Adverse (negative)** during the construction phase.

Cumulative Effects during Operational Phase

The **cumulative magnitude of change** would be '**Very High**', i.e., *Change that is large in extent, resulting in the loss of or major alteration to key elements, features or characteristics of the landscape and/or introduction of large elements considered totally uncharacteristic in the context. Such development results in fundamental change in the character of the landscape.*

The **cumulative effect** locally would be **Moderate to Very Significant**, depending on the proximity to the change. The core coastal areas would remain unaffected by the cumulative effects, as would the core aspects of the Portrane ACA. **These landscape resources would provide a higher value to the growing adjacent population.**

Qualitatively the landscape effect is **Neutral to Beneficial** during operational phase.

14.5.5 Do Nothing Scenario

The '*do-nothing*' impact refers to the non-implementation of the Proposed Development. The primary effect of this would be that the impacts and effects identified above would not directly occur. In this regard, the following issues are relevant.

In the absence of the Proposed Development, this site would continue to operate as an open, abandoned network of fields. Its landscape, biodiversity and recreational values would continue to change and it would detract from the evolving urban area. Depreciation and reduced activity could see

the increase of antisocial behaviour and fly tipping on the site. The objectives of the Development Plan and LAP would not be realised in relation to the site and the purpose and investment in the DDR would not be realised.

14.6 Predicted Visual Impacts

14.6.1 Zone of Visual Influence and Potential Visual Receptors

Based on the assessment of the landscape characteristics, values and sensitivities, 22 representative viewpoints were selected to assess visual impact and effects. These are scheduled and mapped below. The current Phase 3 assessment will refer to the potential cumulative impact of future development of adjacent zoned land, as appropriate.

Existing photographs and proposed photomontages are provided by Modelworks, submitted under separate cover as part of the planning application. The booklet of photomontages should be reviewed in conjunction with this section. The landscape architect's site survey was conducted in March 2025 and verified views were captured in August 2025.

Table 14.9 below lists the representative viewpoints and the rationale for selection. The assessed viewpoints (VP) are shown in **Figure 14.25**, overleaf.

Table 14.9 Viewpoints

VP	Description of viewpoint	Rationale for selection
1	Looking northeast from The Links (east of no.27)	Representing residential receptors overlooking the development.
2	Looking east from The Links/ junction to Links Green	Representing of residential and road receptors next to site.
3	Looking south-east from The Links/junction to Portrane Road	Representing residential receptors and road users on approach to/from the R126 road junction
4	Looking west and south / south-east from within the graveyard	Representing visitors to graveyard
5	View from Donabate Community College – looking east	Potential views from rear of the school but no visibility from the entrance.
6	View looking south from Carr's Mill	Representing residential / road receptors – possible views from rear of properties.
7	View looking south from The Priory	Representing views from rear elevations of adjacent properties to the site.
8	View looking east from No. 70 Priory Wood	Representing residential and road receptors next to site.

VP	Description of viewpoint	Rationale for selection
9	View looking south-southeast from next to No.75 Priory Woods	Representing likely views from rear of residential receptors next to site
10	View looking south-west from the junction of Cycle way / DDR junction / GAA access road	Representing road users – pedestrian, cycle and vehicular receptors.
11	View looking southwest across Portrane Road	Representing views of road users on Portrane Road and from part of the Portrane Demesne ACA.
12	View looking south-west from along R126 road	Representing views from R126 and Portrane Road junction. Visual receptors including road users and scattered residential receptors to north, and from part of the Portrane Demesne ACA.
13	View looking west from Portrane Demesne Woods	Representing pedestrian views and local users of the public amenity, and part of the Portrane Demesne ACA.
14	View looking west-northwest from GAA club	Representing views from community facility.
15	View looking north-northeast from the junction of DDR south & New Road	Representing residential receptors and road users views.
16	View looking northeast from open space opposite No. 5 The Drive Balmoston	Representative of views of residents in new estate.
17	View looking northeast from the Pedestrian Bridge over the Railway Station	Representing views enjoyed by apartment residents along the railway line. Views towards St Patrick's Church and long-distance views towards the site
18	View looking southwest from Quay Road, Portrane	Representing residential, commercial and amenity receptors in the village centre, and the Portrane Demesne ACA.
19	View looking northwest from the coast path	Representing coastal receptors and views experienced by pedestrians using the coastal path and the Portrane Demesne ACA.
20	View looking northwest from the Shoreline Hotel and environs	Representing likely views from the Shoreline Hotel and environs which is a popular destination and part of the Portrane Demesne ACA.
21	DDR looking north-northeast	Representing road receptors
22	DDR looking northwest	Representing road receptors



Figure 14.26: Viewpoints Location Map (courtesy of Modelworks)

14.6.1.1 Photography and Presentation of Viewpoints

Each viewpoint is illustrated by a photograph showing the existing view and the photomontage showing the Proposed Development.

Photomontages have been produced by Modelworks and are presented in a separate booklet as part of the planning application, with a map of their locations. Verified photographs and photomontages have been taken with a wide angle focal length (FL) and prime lens to allow representation of the development within its context. In all visualisations, the extent of the 50mm FL view has been indicated for reference, which is broadly equivalent to the c.40 degree Horizontal Field of View (HFOV) and is representative of what the human eye perceives and reflects the requirements of the Landscape Institute 'Technical Guidance Note on Visual Representation' (2019).

To correctly view the photomontage at the correct scale, the extents of the 50mm lens or 40 degree angle of view should be extended to A3 in size and viewed at arms length. This can be done by printing a hard copy or, more easily, digitally on screen, allowing reference back to the wider angle to understand the context.

Each viewpoint is described below in its existing condition and the effects of the Proposed Development. The descriptions, including of the change / effects, focus primarily on the extent of the 50mm image, and the winter (worst case scenario) view, but refer to the context, as appropriate, to inform analysis.

14.6.2 Construction Impacts and Effects on Visual Receptors

Construction is expected to be phased over 36 months. This is set out in more detail in Chapter 5. However individual areas will experience construction phases as a Short-Term Impact within this 36 month programme.

The construction stage impacts are described for each view in the commentary in Section 14.6.3 and will generally consist of substantial site clearance, including trees and vegetation, and building processes required to construct the Proposed Development. These effects are predominantly **adverse** in nature, varying in magnitude and significance depending on visibility.

14.6.3 Visual Impacts and Effects on Visual Receptors

The descriptions below of impacts and effects focus primarily on the Operational Stage of the development i.e. post-completion and the use/occupation of the development and the establishment and maturing of landscape works over time. Each viewpoint contains a brief description of Construction Stage Impacts and also potential Cumulative Impacts in association with adjacent planned development.

14.6.3.1 Viewpoint 1: Looking northeast from the Links (east of no.27)	
Existing	This existing view is from the Links, a local road (the road linking the Links neighbourhood to Portrane Road). The viewpoint is situated on the western footpath of the road and is approximately 100m from south-western site boundary. The view is representative of views experienced by road users and pedestrians, and the views experienced by the residents of the Links neighbourhood. In the view; the road and alongside it the grass verge, and footpaths on either side of the road is visible. The Links Road is closed off to the eastern boundary by fencing; the construction area and construction activity related to Phases 1 & 2 is visible, with earth stockpiled within the development area. To the centre of the background, existing hedgerows and trees are partially visible. Overall, the view is from a local road in a residential neighbourhood, at the edge of an urban location looking at construction activity of an area in transition. The most prominent features are the construction mounding, vegetation; hedgerows and trees scattered in the landscape.
Sensitivity	High
Visual Impacts and Effects	
Construction Effects	The construction activity would be partially visible from this location. The effect would be significant, adverse and short term.
Operational Phase	The Proposed Development would be partially visible in the view, however mostly screened from the existing fence / construction hoarding around the existing construction site.

	A number of roofs of proposed dwellings are visible over the fence. An upper storey of an apartment block is visible to the right of the view, over the fence.	
	<i>Magnitude of Change</i>	Low
	<i>Significance of Effects</i>	Moderate
	<i>Quality</i>	Neutral
	<i>Duration</i>	Permanent
Cumulative Effects	The cumulative view would include the Phase 2 permitted development in the view. In the cumulative view, a row of permitted 2-3 storey residential dwellings with associated individual driveways and landscaping including tree planting would be visible. In total 10 dwellings would be visible with 2 blocks in the view. They would present an attractive streetscape and light brick coloured elevation with tree planting and hedges. Most of the proposed Phase 3 is screened by the closer Phase 2 development. The cumulative change would be High resulting in Very Significant but Beneficial change in the view.	

14.6.3.2 Viewpoint 2: Looking east from The Links/junction to Links Green	
Existing	This existing view is from the Links, a local road (the road linking the Links neighbourhood to Portrane Road). The viewpoint is situated along the southern footpath of the Links road, and south-west of the junction of two local roads, and is approximately 30m from western application site boundary. The view is representative of views experienced by road users and pedestrians, and the views experienced by the residents of the Links neighbourhood. In the view; the junction of two local roads (both known as the Links) is visible, the shared cycle and pedestrian path is visible running across the view, so as is the Links Road (connecting the Links neighbourhood to Portrane Road); the Links Road is closed off by fencing to the east; and the construction area and construction activity is visible behind, with earth stockpiled on the development site. This construction activity is related to Ballymastone Phases 1 & 2. Overall, the view is from a local road in a residential neighbourhood, at the edge of an urban location looking at construction activity of an area in transition. The most prominent features are the construction mounding and trees scattered in the landscape.
Sensitivity	High
Visual Impacts and Effects	

Construction Effects	The construction stage would see hoarding and construction activity including vehicles and lifting machinery operating here temporarily, similar to the existing view. The effect would be significant, adverse and short term .	
Operational Phase	The Proposed Development would create a new outlook to the eastern side of the Links Road. A varying 3-5 storey apartment block would be visible to the left of the view overlooking the existing street; a new access road and row of 3-storey duplexes would be visible to the centre, and a 3-storey duplex house would be visible to the right. The elevations would contain variety in brickwork, animated by balconies and would present an attractive neighbourhood, coupled with associated street tree planting, and landscaping.	
	<i>Magnitude of Change</i>	Medium
	<i>Significance of Effects</i>	Significant
	<i>Quality</i>	Beneficial (Positive)
	<i>Duration</i>	Permanent
Cumulative Effects	Other development would not be visible from this location. Thus, there would be no cumulative visual effects.	

14.6.3.3 Viewpoint 3: Looking south-east from The Links / junction to Portrane Road	
Existing	This view is located on the west side of the Links Road approximately 60m from the Portrane Road. In the foreground, the Links road, the verge and trees along the road and the new cycleway and footpath are visible and present an attractive, well maintained and established sub-urban landscape. To the left (east) of the view, the masterplan/development lands are fenced off limiting the views of the site. Topsoil from Phase 1 & 2 works under construction is stockpiled to the rear of the fencing and closes more distant views. To the right (west) the local greens and house of the Links estate are visible. Overall the view is mixed showing an established residential area, street improvements and new development underway.
Sensitivity	Medium.... Although the area is residential and the setting attractive the viewpoint is located along an access road with no houses facing outwards across the road towards the masterplan lands / Phase 3 site, but instead backing on to the road with construction works already underway.
Visual Impacts and Effects	

Construction Effects	The construction stage would see hoarding and construction activity including vehicles and lifting machinery operating here temporarily, similar to the existing view. The effect would be Moderate & adverse . Similar to what is visible.	
Operational Phase	The Proposed Development would create a new outlook to the eastern side of the Links Road. A 3-5 storey apartment block would be visible to the centre-left of the view; coupled with a new access road and row of 3-storey duplexes in the centre-right of the view. They would present an attractive new streetscape, along with street tree planting, and landscaping. The Proposed Development would be partially screened/softened by existing trees from this location.	
	<i>Magnitude of Change</i>	Medium
	<i>Significance of Effects</i>	Moderate
	<i>Quality</i>	Beneficial
	<i>Duration</i>	Permanent
Cumulative Effects	Parts of the Phase 2 development would be visible to the right (south) of Phase 3- some 2-3 storey residential dwellings. The cumulative change would be the evolution of the view from a construction area to a view with attractive streetscape of a more urban, but well considered environment. The cumulative effect of the development would be part of the evolution towards an expanded urban area in accordance with policy. The cumulative change would be High and impact/effect would be Significant and Neutral.	

14.6.3.4 Viewpoint 4: Looking east from within the Donabate Burial Ground

<i>Existing</i>	This view is from within the Donabate Burial Ground approx. 65m from the site boundary. The views are representative of views experienced by visitors to the burial grounds, and also from the residents. The view is of the Donabate Burial Ground. To the right (north) of the view is existing residential development of Willbrook; to the right of the view topsoil from Phase 2 works under construction is stockpiled on the site; and to the middle (east) and background of the view is closed off by leylandii trees. Overall the view is of a burial ground, with construction activity visible in the background.
<i>Sensitivity</i>	Medium-High
<i>Visual Impacts and Effects</i>	

Construction Effects	The construction stage would see construction activity including vehicles and lifting machinery operating here temporarily. The effect would be Moderate, Adverse and Short-term . Similar to what is visible.	
Operational Phase	The Proposed Development is visible to the background of the view. A row of 3-storey residential dwellings are partially visible through the gap in the vegetation. The Proposed Development is mostly screened/softened by existing hedgerow trees along the eastern boundary of the burial ground.	
	<i>Magnitude of Change</i>	Low
	<i>Significance of Effects</i>	Slight
	<i>Quality</i>	Neutral
	<i>Duration</i>	Permanent
Cumulative Effects	Other developments would not be visible from this location. Thus, there would be no cumulative visual effects.	

14.6.3.5 Viewpoint 5: View from Donabate Community College – looking east		
Existing	This view is located at the footpath of a local road, leading to the Community College. The viewpoint is representative of views experienced by road users and pedestrians and users of Donabate Community College. In the foreground, the local road is visible; in the middle ground, the residential single storey properties are visible; and in the background, some tall trees can be seen over the roofs of some properties. The Proposed Development site is not visible from this location.	
Sensitivity	Low	
Visual Impacts and Effects		
Construction Effects	The construction stage of the development would not be visible from this location. There would be no change to the view.	
Operational Phase	The development would not be visible from this location. There would be no change to the view.	
	Magnitude of Change	-
	Significance of Effects	-
	Quality	-
	Duration	-
Cumulative Effects	Other developments would not be visible from this location. Thus, there would be no cumulative visual effects.	

14.6.3.6 Viewpoint 6: Looking south from Carr’s Mill		
Existing	The view is located at the footpath along Carr’s Mill road, close to the first cul-de-sac junction with Carr’s Mill. The view is looking south towards the main development area of site some 250m away. The viewpoint is representative of views experienced by road users and pedestrians and residents of the Carr’s Mill neighbourhood.	
	In the foreground and middle-ground, the Carr’s Mill road, grass verge and trees, and pedestrian pathways are visible. To the left (east), a garden wall in stone is visible; and to the right (west), front gardens and entrances to residential properties are visible. In the middle distance, residential properties along the R126 close the view south. Some mature trees are visible above the roofs of the properties on the R126. These trees are to the rear of the Donabate Burial Grounds and also form part of the northern boundary line of the wider Ballymastone Masterplan lands. The view is of an established and attractive residential neighbourhood	
Sensitivity	High	
Visual Impacts and Effects		
Construction Effects	The construction stage of the development would not be visible from this location. There would be no change to the view.	
Operational Phase	The development would not be visible from this location. There would be no change to the view.	
	Magnitude of Change	-
	Significance of Effects	-
	Quality	-
	Duration	-
Cumulative Effects	Other development would not be visible from this location. Thus, there would be no cumulative visual effects.	

14.6.3.7 Viewpoint 7: Looking south from the Priory		
Existing	This view is located at the end / cul-de-sac of the Priory looking south. The view is orientated towards the northern part of the masterplan for future phases of assessment. The viewpoint is representative of views enjoyed by residential properties and road users. In the foreground, the local suburban road and associated grassy areas and some mature trees are visible with residential front gardens. In the middle ground; to the left, thick vegetation is visible; in the middle, the site boundary (in the form of thick hedgerow and vegetation and rows of trees) is visible; and a low brick wall and	

	residential entrance is visible. This vegetation closes views further south to the Phase 3 lands. Overall, the view is of a mature, leafy residential street.	
<i>Sensitivity</i>	High	
<i>Visual Impacts and Effects</i>		
<i>Construction Effects</i>	Construction activity would be partially visible from this location. Generally, construction effects would be moderate, adverse and short-term in nature.	
<i>Operational Phase</i>	A 2-storey dwelling would visible through the gap in the location to the centre of the view, and roofs of other dwellings to the right and left of the view. Most of the Proposed Development would be screened by existing vegetation.	
	<i>Magnitude of Change</i>	Medium
	<i>Significance of Effects</i>	Moderate - Significant
	<i>Quality</i>	Neutral
	<i>Duration</i>	Permanent
	<i>Cumulative Effects</i>	Other development would not be visible from this location. Thus, there would be no cumulative visual effects.

14.6.3.8 Viewpoint 8: Looking east from No. 70 Priory Wood		
Existing	This view is situated on Priory Wood, a local road leading to a cul-de-sac and in front of property 70 Priory Wood. The view is orientated towards the northern part of the Phase 3 and masterplan lands. The viewpoint is representative of views experienced by road users and pedestrians, and the residents of Priory Wood. In the view, the local road with mature trees and woodland are visible. Overall, the view is of mature trees and woodland area from a residential street.	
Sensitivity	High	
Visual Impacts and Effects		
Construction Effects	Construction activity would be partially visible from this location. Generally, construction effects would be moderate, adverse and short-term in nature.	
Operational Phase	Most of the Proposed Development would be screened by the existing vegetation. Some proposed dwellings are partially visible through the gap in vegetation.	
	Magnitude of Change	Low
	Significance of Effects	Moderate
	Quality	Neutral

	<i>Duration</i>	Permanent
Cumulative Effects	Other developments would not be visible from this location. There would be no cumulative visual effects.	

14.6.3.9 Viewpoint 9: Looking south-southeast from next to No. 75 Priory Wood		
Existing	This view is situated on Priory Wood, a local road leading to a cul-de-sac and in front & next to property 87 Priory Wood. The view is orientated towards the northern part of Phase 3. The viewpoint is representative of views experienced by road users and pedestrians, and the residents of Priory Wood. In the view, the local road and open space are visible, to the right a semi-detached residential dwelling is partially visible in the view. The views are closed off by mature trees and vegetation. Overall, the view is of a green and leafy residential street.	
Sensitivity	High	
Visual Impacts and Effects		
Construction Effects	Construction activity would be partially visible from this location. Generally, construction effects would be moderate, adverse and short-term in nature.	
Operational Phase	4 storeys of an apartment block would be partly visible to the centre and background of the view – with some partial visibility of adjacent elements depending on local trees / season..	
	Magnitude of Change	Low-Medium
	Significance of Effects	Moderate-Significant
	Quality	Neutral
	Duration	Permanent
Cumulative Effects	Other development would not be visible from this location. Thus, there would be no cumulative visual effects.	

14.6.3.10 Viewpoint 10: Looking south-west from the Junction of Cycleway / DDR Junction / GAA Access Road		
Existing	The view is located near the junction of the DDR and the GAA Access Road approximately 50m from the site boundary. This viewpoint is representative of views experienced by road users, pedestrians and cyclists along the DDR. The DDR with grass verge, footpath, cycleway and buffer planting are visible. To the left of the view, the bend of the DDR and the topography is slightly elevated. To the	

	centre, the timber and mesh fence marking the site and the site itself is screened by tree and native shrub planting. To the right, the large wooded area along Martin’s Lane is partially visible. In the background, tall mature trees and hedgerows along field boundaries are partially visible. The woodland area forms a buffer between the Phase 3 lands and Priory Wood is also partially visible. The most valuable elements would be the existing vegetation in the view, off and on the site contributing to the visual character and landscape structure of the area.	
<i>Sensitivity</i>	Medium	
<i>Visual Impacts and Effects</i>		
<i>Construction Effects</i>	The construction stage construction activity including vehicles and lifting machinery and scaffolding operating here would be visible. The effect would be of significant, adverse and short-term .	
<i>Operational Phase</i>	The proposed three duplex blocks off the DDR would be visible partly obscured by the vegetation and roofscape.	
	The Proposed Development would create a new urban element in the landscape, changing the character of the view and DDR corridor, contributing to place-making in accordance with policy.	
	<i>Magnitude of Change</i>	Medium
	<i>Significance of Effects</i>	Moderate
	<i>Quality</i>	Neutral-Beneficial
	<i>Duration</i>	Permanent
Cumulative Effects	The permitted and under construction Phase 2 would be visible to the left (south) and background of the view, along the western side of the DDR. Phase 2’s apartment blocks and low-rise residential dwellings would be partially visible in the view. The cumulative change would be the evolution of the road corridor / view to a more urban, but well considered environment. The cumulative effect of the development would be critical in place-making in accordance with policy. The cumulative impact would be High and effect would be Significant and Neutral-Beneficial.	

14.6.3.11 Viewpoint 11: Looking southwest from Portrane Road

<i>Existing</i>	The view is located on the footpath along the northside of R126 and about 150m from the junction of the old R126 and new DDR. The view is oriented south-west and about 215m from the northern site boundary. The view is representative of views enjoyed by road users between the DDR and from part of the Portrane Demesne ACA.
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	In the view, the R126 is visible, and the wooded area along Martin’s Lane closes the view in the middle distance. The view is dominated by the local woodland, part of the wider Portrane Demesne.	
<i>Sensitivity</i>	Medium	
<i>Visual Impacts and Effects</i>		
<i>Construction Effects</i>	The construction stage of the development would not be visible from this location. There would be no change to the view.	
<i>Operational Phase</i>	The development would not be visible from this location. There would be no change to the view.	
	<i>Magnitude of Change</i>	-
	<i>Significance of Effects</i>	-
	<i>Quality</i>	-
	<i>Duration</i>	-
<i>Cumulative Effects</i>	Other development would not be visible from this location. Thus, there would be no cumulative visual effects.	

14.6.3.12 Viewpoint 12: Looking South / South-west from DDR near junction with Portrane Road / old R126

Existing	This view is located at the footpath along the northside of the new R126 / DDR and about 25m east from the junction of Portrane Road and R126 and looking south west towards the site almost 900m away. The views are representative of views enjoyed by road users and from part of the Portrane Demesne ACA. In the foreground and middle-ground, the DDR corridor is visible weaving southwards. To the left (east), can be seen mixed woodland that was historically part of the Portrane Demesne is visible. To the right (west), the junction with Portrane Road (old R126) is visible leading to the town of Donabate. In the background; to the right of the DDR, tall mature trees around Martin's Lane indicate the northern boundary of the wider Ballymastone masterplan lands. The woodland to both sides of the road obscures long-distance views and is effective in screening existing built form at the edge of the town. This is a view along a new Regional Road and the corridor of the road is also new/ establishing. The mature woodland of the historic Portrane Demesne is the prominent structuring and enclosing element in the landscape. The road weaves its route south through the mature established setting. New landscape planting is establishing along the road corridor. This is an attractive but developing outlook along the new road.
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<i>Sensitivity</i>	Medium	
<i>Visual Impacts and Effects</i>		
<i>Construction Effects</i>	The construction stage of the development would barely be visible from this location. The effect would be of not-significant, adverse and short-term .	
<i>Operational Phase</i>	Most of the Proposed Development would be screened by existing vegetation in the view. The top 3-storeys of a proposed apartment block is partially visible to the centre, and a partial roof of a residential dwelling is visible to the left of the apartment block. The Proposed Development would not obscure any prominent landscape features.	
	<i>Magnitude of Change</i>	Negligible
	<i>Significance of Effects</i>	Imperceptible
	<i>Quality</i>	Neutral
	<i>Duration</i>	Permanent
	<i>Cumulative Effects</i>	Other development would not be visible from this location. Thus, there would be no cumulative visual effects.

14.6.3.13 Viewpoint 13: View Looking west from Portrane Demesne Woods	
Existing	This view is from an access road / walkway on the western edge of Portrane Demesne woodland looking south-west towards the site some 275m away. The views are representative of views enjoyed by local amenity users and part of the Portrane Demesne ACA. In the foreground, the old road can be seen winding west towards the DDR. To the left and right of the road the landscape is semi-natural with a mix of meadow, regenerating scrub, specimen parkland trees and to the right(north) the edge of the Portrane woodland. In the distance can be seen the boundary timber fence of the DDR road corridor with further large trees / woodland prominent further west. The view is of a former parkland / demesne (Portrane) and rural landscape in transition as the DDR creates opportunities for both development as well as enhanced, access, valued landscapes and enjoyment.
Sensitivity	High
Visual Impacts and Effects	
Construction Effects	The construction stage of the development would be partly visible from this location. Generally, would be significant and adverse, and would last during the construction period.

Operational Phase	Part of the Proposed Development would be visible in the middle-left and middle of the background of the view, although much would be partly screened behind the trees and woods. The upper floors of the apartment buildings facing the DDR would be the most prominent new and an urbanising feature in the view. Some roofs of low-rise housing within the northern part of the site are also partially visible.	
	<i>Magnitude of Change</i>	Medium
	<i>Significance of Effects</i>	Significant
	<i>Quality</i>	Neutral
	<i>Duration</i>	Permanent
Cumulative Effects	The cumulative view includes the proposed Phase 3 development and partially visibility of the permitted Phase 2 development to the left of the Proposed Development and to the left of the view. The permitted recreation hub would occupy lands beyond the tree line / hedgerow to the left (south) of the viewer and would potentially be partly visible particularly taller infrastructural elements such as floodlights. The cumulative effect of these developments would be visible but would be important in place-making in accordance with policy. The cumulative impact/effect would be of significant and neutral.	

14.6.3.14 Viewpoint 14: View Looking northwest from GAA Club Car Parking	
Existing	This view is from the edge of the GAA club parking area approximately 290m from the site boundary. The view is representative of views enjoyed by recreational users of the GAA club and looks west towards the site. The view is of a field alongside the GAA grounds. The field is unkempt and overgrown in places. In the background of the view; to the left(south west), construction activity and stockpiling are visible and to its right (north west) the roof of a residential dwellings in Priory Wood is partially visible; to the central (west and north west), mature woodland north of the site and along Martin's Lane are visible. The view is of a mixed and shows a landscape in transition.
Sensitivity	Low
Visual Impacts and Effects	
Construction Effects	The construction stage would see partial visibility of some construction activity including vehicles and lifting machinery here temporarily. The effect would be of moderate significance, adverse and short-term.

Operational Phase	The viewer would see the Proposed Development in the middle and left of the background of the view. From left (south west), 2 no. 6-storey apartment blocks are visible and prominent with their elevations looking east over the DDR, and to its right or middle of the view, roofs of 2-storey residential dwellings would be partially visible. Behind the apartments, other duplex blocks are partially visible. Once the proposed landscape matures, the facades and elevations of the blocks would be partially softened by intervening vegetation and trees along the DDR – this would help anchor the prominent buildings in an evolving maturing new context.	
	<i>Magnitude of Change</i>	High in the short and medium term Low in the long term - as planting matures, the magnitude of change would decline.
	<i>Significance of Effects</i>	Moderate in the short and medium term Slight in the long term.
	<i>Quality</i>	Neutral , improving to Beneficial in the long-term.
	<i>Duration</i>	<i>As above</i>
Cumulative Effects	There is no cumulative view photomontage. However, between the viewpoint and the site is the permitted but not yet constructed Recreational Hub. The main change would be the proposed new recreation ground which would occupy all of the foreground up to the DDR and lands to the rear and right(north) of the viewer. The open field to the front would be replaced by an athletic track with floodlighting and a more sophisticated sports infrastructure created. The view would change to include the recreational hub in the fore and middle-ground and would partly screen the Proposed Development from this location. The cumulative change would see further expansion of the town facilities and amenities to service the expanding population created by the Proposed Development and existing and other planned developments. The cumulative effect of these developments would change parts of the rural character of the receiving environment but would be important in place-making in accordance with policy and the provision of new residential and recreational facilities. The cumulative impact/effect would be of significant and neutral-beneficial.	

14.6.3.15 Viewpoint 15: View Looking north-northeast from the Junction of DDR South & New Road

Existing	This view is located on the footpath near the junction of DDR / R126 and New Road. The view looks north and is about 600m from the site boundary. The view is
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	representative of views enjoyed by road users, pedestrians, visitors to the seaside amenities further along New Road and local residential receptors at this location. In the view the DDR is visible, running straight / south to north through the view, lined with street lights and newly planted landscape. To the right/east of the DDR, undeveloped lands – part of the reservation area of the DDR are visible; and to the left / west of the DDR, residential development, a mix of 4-storey apartment and 2-storey houses are visible in the view and create a new urban character. In the middle-ground, Ballymastone Phase 1 is visible; east of the DDR to the right, 3-storey duplexes and 2-storey residential dwellings form a new neighbourhood, and to the left, 5-6 storey apartment blocks under construction are visible facing the DDR. Part of the site is visible in the centre and background of the view beyond the apartments with the boundary trees to Priory Wood and Martins Lane partly visible. The view is of a new road passing through partly developed new urban area / in transition landscape.	
<i>Sensitivity</i>	Medium	
<i>Visual Impacts and Effects</i>		
<i>Construction Effects</i>	The construction stage would see partial visibility of some construction activity including vehicles and lifting machinery and scaffolding operating here temporarily. The effect would be of slight significance, adverse and short-term .	
<i>Operational Phase</i>	The Proposed Development would see the new 5-6-storeys apartment buildings and 3-storey duplexes providing a strong new built edge to the DDR in the middle and background of the view. New tree planting to the DDR and streets and open spaces complements and softens the elevations and varied cladding (of the apartments) creating a considered new townscape replacing the distant views of established woodland and hedgerows to the north, and realising the local development plan policies in an attractive place-making composition.	
	<i>Magnitude of Change</i>	Low-Medium
	<i>Significance of Effects</i>	Slight-Moderate
	<i>Quality</i>	Neutral
	<i>Duration</i>	Permanent
Cumulative Effects	The permitted and under construction Phase 2 development of the masterplan would fill out the space between the visible Phase 1 and proposed Phase 3 developments. Apartment blocks of similar scale to the Proposed Development would be built and prominent in the view. The effect would be the consolidation of the three developments and the “finishing” of a coordination urban edge to the DDR as part of ongoing place-making in accordance with policy.	

	The cumulative impact/effect would be significant and neutral-beneficial .
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14.6.3.16 Viewpoint 16: Looking north from open space opposite No. 5 The Drive Balmoston		
Existing	This existing view is from Phase 1 Ballymastone development. The viewpoint is from a public open space opposite house no. 5 The Drive, Balmoston, and is about 500m from the site. The view is representative of views experienced by residents of Phase 1 development.	
	In the view; the road, footpaths, car parking are visible to the centre; to the right (east) of the road, driveways and a row of 2-3-storey residential dwellings are visible; and to the left (west), 3-storey duplexes are visible. In the middle and middle-ground of the view, a solid fence at the boundary of the Phase 1 site is visible and closes views to Phase 2 beyond. Beyond the fence some construction activity and stockpiling are visible, and also the boundary trees around the burial ground can be seen.	
	Overall, the view is from a local road in a new residential neighbourhood, at the edge of an urban location looking toward the site boundary and an adjacent development site beyond. Although the foreground site is unfinished and new, with limited landscaping present yet, the emerging new residential and urban character is evident.	
Sensitivity	Medium (works still ongoing)	
Visual Impacts and Effects		
Construction Effects	The construction activity including vehicles and lifting machinery operating in the background of the view.	
	The effect would be moderate, adverse and short term.	
Operational Phase	The proposed Phase 3 development would be partly visible in the background of the view. The 4-5-storey apartment block near the Links / south of the burial ground is visible along with roofs of other 2-3 storey residential dwellings more centrally.	
	Magnitude of Change	Low
	Significance of Effects	Slight
	Quality	Neutral
	Duration	Permanent
Cumulative Effects	The permitted and under construction Phase 2 development would be visible in the view, and views to the more distant Phase 3 development would be lost. In the view, a 3-storey duplex block acts as a bookend to the view, and other 2-storey residential dwellings are visible along with landscaping.	

	The character of the view would change from a construction area, former green field landscape, to a well considered new residential area in line with the permission and policy. The cumulative impact/effect would be significant and beneficial.
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14.6.3.17 Viewpoint 17: View Looking northeast from the Pedestrian Bridge at Donabate Station		
Existing	The view is from the overhead railway bridge crossing centrally in the town. The view is looking east towards the town centre and the development site beyond and is approx. 800m from the western site boundary. The views are representative of views from pedestrians and commuters using the railway as well as elevated town centre views.	
	In the view, the Donabate Train Station Car Park is clearly visible in the foreground. In the middle and background, large trees along the edge of the car park screens the town to the east from the view. The are apartments blocks along Ballisk Court visible in the left-hand side (north) of the view. The distinctive Spire of the Saint Patrick’s Church is clearly visible and is one of the prominent features of the view. The topography of the landscape is mostly flat and therefore, there are no long-distance views other than some distant trees tops visible in the background. The construction crane within Phase 1 permitted development is visible to the right and background of the view.	
	The view is a working town centre location used by commuters and visitors but also representative of local residents.	
Sensitivity	Medium	
Visual Impacts and Effects		
Construction Effects	The construction stage would be similar to existing with taller equipment partially visible as Phase 1. The effect would be slight, neutral and short-term.	
Operational Phase	The upper floors of the apartment buildings in Phase 3 would be partly visible to the left in the background amongst the buildings. It is a minor and barely perceptible addition to the view and would be seen as a distant consolidation of the built up area.	
	Magnitude of Change	Negligible
	Significance of Effects	Not significant
	Quality	Neutral
	Duration	Permanent
Cumulative Effects	The permitted Phase 2 development would be barely visible to the centre of the view / south of the Proposed Development. The upper floors of the apartment buildings in Phase 2 would be partly visible in the background amongst the trees and buildings.	

	The cumulative impact/effect would be slight and neutral .
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14.6.3.18 Viewpoint 18: View Looking southwest from Quay Road, Portrane	
Existing	This viewpoint is located approx. 2km from the site at Portrane, and situated on Burrow Road, along the coast. The views are presentative of views enjoyed by local residential receptors, open space users and users enjoying views from the coast/beach and reflects a view from the coast from within the Coastal Character Area and the Portrane Demesne ACA. Portrane is a small seaside settlement, about 3km from Donabate, Fingal. This coastal settlement is of predominantly 2-storey residential dwellings with attractive greens and trees. The topography is predominantly flat except for the Portrane Demesne which is located on an elevated site. There are no long distance views available inland from the settlement. In the foreground the Burrow Road and Portrane Road can be seen. In the middle ground, to the left (south) a vacant site and some vegetation can be seen behind a stone wall, to the right a village green can be seen with some perimeter tree planting. In the background to the centre, the existing housing of the Portrane settlement is visible and closes the view west. The existing developments coupled with tree planting close long distance views from this viewpoint. The view is from a coastal location looking inland and would be from a core area of the Coastal Character LCA. The location is an attractive settlement by the coast / beach.
Sensitivity	High
Visual Impacts and Effects	
Construction Effects	The development would not be visible from this location. There would be no effects during construction.
Operational Phase	The development would not be visible from this location. There would be no change to the view.
	<i>Magnitude of Change</i> -
	<i>Significance of Effects</i> -
	<i>Quality</i> -
	<i>Duration</i> -
Cumulative Effects	Other developments planned in the immediate area and future phases of the Ballymastone masterplan would not be visible from this location. There would be no cumulative impact/effect.

14.6.3.19 Viewpoint 19: Looking northwest from the coast path		
Existing	The existing view is from Donabate Portrane Cliff Walk. The viewpoint is situated mid-way along the coastal walk and just north of Ladies Beach, Donabate. The viewpoint is approx. 1.6km from the site and is looking west towards the Portrane Demesne and Donabate Golf Club and beyond towards the development site. The views are representative of views enjoyed by coastal walkers and amenity areas of the coast and a core part of the Coastal Character LCA and the Portrane Demesne ACA.	
	In the foreground and middle-ground the walking path and the open landscape are visible. In the background, woodland which forms part of the Portrane Demesne closes the view to the west and north. There are no long distance views available because of the topography being flat and existing vegetation in the landscape. The composition of the view is very simple with no built development visible.	
	The view is from a coastal location looking inland and would be from a core area of the Coastal Character LCA. The location is a popular local walk / amenity.	
Sensitivity	High	
Visual Impacts and Effects		
Construction Effects	The development would not be visible from this location. There would be no effects during construction.	
Operational Phase	The development would not be visible from this location. There would be no change to the view.	
	Magnitude of Change	-
	Significance of Effects	-
	Quality	-
	Duration	-
Cumulative Effects	Other developments planned in the immediate area and future phases of the Ballymastone masterplan would not be visible from this location. There would be no cumulative impact/effect.	

14.6.3.20 Viewpoint 20: View looking northwest from the Shoreline Hotel and environs		
Existing	The viewpoint is situated mid-way along the Donabate Portrane Cliff Walk and about 250m north from the Shoreline Hotel located on Corballis Cottages / Donabate Beach. The viewpoint is approx. 1.5km from the site and is looking west towards the Donabate Golf Club and the development site. The views are representative of views enjoyed by coastal walkers and amenity areas of the coast and part of the Portrane Demesne ACA.	

	In the view, in the foreground and middle-ground the flat topography is evident and is occupied by a field in a meadow. In the background, a cluster of residential development lies just east of the Donabate Golf Club but is well integrated/hidden in associated trees and vegetation. Due to the flat topography the trees close any long distance views westwards.	
<i>Sensitivity</i>	High	
<i>Visual Impacts and Effects</i>		
<i>Construction Effects</i>	The development would not be visible from this location. There would be no effects during construction.	
<i>Operational Phase</i>	The development would not be visible from this location. There would be no change to the view.	
	<i>Magnitude of Change</i>	-
	<i>Significance of Effects</i>	-
	<i>Quality</i>	-
	<i>Duration</i>	-
Cumulative Effects	Other developments planned in the immediate area and future phases of the Ballymastone masterplan would not be visible from this location. There would be no cumulative impact/effect.	

14.6.3.21 Viewpoint 21: DDR Looking north

Existing	The existing view is from Donabate Distributor Road (DDR). The viewpoint is looking north directly at the core part of the permitted Phase Two and proposed Phase 3 development sites. The views are representative of views enjoyed by road users, cyclists and pedestrians. In the foreground the DDR, crossroads or four-way junction and associated road infrastructure are visible. In the foreground, the road turning right (east) leads to Phase 1 (Ballisk) and the permitted Recreational Hub and the road turning left leads directly to the masterplan lands and will be one of the main access to the masterplan lands and Phases 1, 2 & 3 from the DDR. In the middle-ground, the solid fencing around the masterplan lands are visible and screens the construction activity of Phase 2 development. In the background, right of centre (north west), the woodland along the northern site boundary and along Martin's Lane / part of Portrane Demnse landscape is visible and prominent The current character of the view is heavily influenced by construction works associated with the permitted Phase 2 scheme and the recent nature of the DDR road corridor.
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<i>Sensitivity</i>	Medium	
<i>Visual Impacts and Effects</i>		
<i>Construction Effects</i>	The construction stage would see partial visibility of some construction activity including vehicles and lifting machinery operating here temporarily. The effect would be of moderate significance, adverse and short-term .	
<i>Operational Phase</i>	The Proposed Development would see new apartment buildings and duplexes at this location. The 5-6-storey apartments would provide a strong new built edge to the DDR in the middle of the view, and to its rear (west), 3-storey duplexes would be visible. Further west and to the north, 2-storey houses would be partially visible. New tree planting to the DDR and streets and open spaces would complement and soften varied elevations and form (of the apartments) creating a considered new townscape. Overtime, the proposed trees and planting along the DDR would mature and further soften the views, realising an attractive place-making composition or streetscape along the DDR in keeping with local development plan policies.	
	<i>Magnitude of Change</i>	High
	<i>Significance of Effects</i>	Significant
	<i>Quality</i>	Beneficial
	<i>Duration</i>	Permanent
	<i>Cumulative Effects</i>	The cumulative view would include the permitted Phase 2 development’s 6-storey apartment block to the left of the view (south of Phase 3) partially screening the western parts of the Phase 3 development to the rear. The cumulative effect of these developments would be to create a strong built or urban edge to the DDR and a built edge to Donabate itself. This would be transformative and part of ongoing place-making in accordance with policy. The cumulative impact/effect would be Very significant and beneficial .

14.6.3.22 Viewpoint 22: DDR Looking north-west

<i>Existing</i>	The existing view is from the Donabate Distributor Road (DDR). The viewpoint is close-distance view and is looking west at the northern part of the wider masterplan lands. The views are representative of views enjoyed by road users. In the view, in the foreground the DDR and associated infrastructure are visible. The view is also looking at crossroads or four-way intersection which would access the lands to the west of the DDR. Along the DDR boundary the construction hoarding, construction activity, and stockpiling are visible. In the background, the existing residential development of Priory Wood is partly visible however the general outlook is of slightly overgrown fields and associated hedgerows and trees beyond the
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	construction works. Behind the viewer the junction leads to the new Recreational Hub and Phase 1 development. Overall, the view of a construction site (Phase 2). The Phase 3 lands are partly to the background of the view and north of the Phase 2 site.	
<i>Sensitivity</i>	Medium	
<i>Visual Impacts and Effects</i>		
<i>Construction Effects</i>	The construction stage would see limited visibility of construction activity o the Phase 3 site, including ongoing vehicles and lifting machinery operating here temporarily. The effect would be of Moderate, adverse and short-term .	
<i>Operational Phase</i>	The proposed duplexes are partially visible to the right and the 2-3-storey housing blocks are visible in the background of the view.	
	<i>Magnitude of Change</i>	Medium
	<i>Significance of Effects</i>	Moderate
	<i>Quality</i>	Beneficial
	<i>Duration</i>	Permanent
Cumulative Effects	The permitted Phase 2, 5 & 6-storey apartment blocks along / facing the DDR would be visible in the view, along with proposed landscaping, framing the junction. The elevations offer interesting and contrasting elements of brick, metal cladding, balconies and create a distinctive landmark gateway to the development area contributing to place-making for the new urban area. The Permitted Phase 2 would screen most of the Phase 3 development, however, residential dwellings are visible in the background of the view / in between the apartments blocks. The cumulative impacts /effects would be High resulting in Significant and Beneficial part of transformative change.	

14.6.4 Summary of Visual Effects

Table 14.10 Table of Summary of Visual Effects

VP	Location	Sensitivity	Construction Phase Visual Impact and Effects	Operational Phase Visual Impact and Effects			Cumulative Visual Impact and Effects
				Magnitude of Change	Significance	Quality and Term	
1	Looking northeast from The Links (east of no.27)	High	Significant, adverse and short term.	Low	Moderate	Neutral & Permanent.	High resulting in Very Significant but Beneficial change
2	Looking east from The Links/ junction to Links Green	High	Significant, adverse and short term.	Medium	Significant	Beneficial & Permanent	No cumulative impacts
3	Looking south-east from The Links/junction to Portrane Road	Medium	Moderate, adverse and short term.	Medium	Moderate	Beneficial & Permanent	High resulting in Significant and neutral change
4	Looking east from within the Donabate Burial Ground	Medium-High	Moderate, Adverse and short term.	Low	Slight	Neutral & Permanent.	No cumulative impacts
5	Looking east from Donabate Community College	Low	No construction impacts	No change	-	-	No cumulative impacts
6	View looking south from Carr's Mill	High	No construction impacts	No change	-	-	No cumulative impacts
7	View looking south from The Priory	High	moderate, adverse and short-term	Medium	Moderate-Significant	Neutral & Permanent	No cumulative impacts
8	View looking east from No. 70 Priory Wood	High	moderate, adverse and short-term	Low	Moderate	Neutral & Permanent	No cumulative impacts
9	View looking south-southeast from next to No.75 Priory Woods	High	moderate, adverse and short-term	Low-medium	Moderate-Significant	Neutral & Permanent	No cumulative impacts
10	View looking southwest from the junction of Cycle way / DDR junction / GAA access road	Medium	Significant, adverse and short term.	Medium	Moderate	Neutral-Beneficial & Permanent.	High resulting in Significant and Neutral-Beneficial change
11	View looking southwest from Portrane Road	Medium	No construction impacts	No change	-	-	No cumulative impacts
12	View looking southwest from along R126 road	Medium	Not-significant, adverse and short-term.	Negligible	Imperceptible	Neutral & Permanent	No cumulative impacts
13	View looking west from Portrane Demesne Woods	High	Significant, adverse and short term.	Medium	Significant	Neutral & Permanent	Significant & Neutral
14	View looking northwest from GAA club	Low	Moderate, Adverse and short term.	High in the short to medium term, & Low in the long term	Moderate in the short to medium term, and Slight in the long term.	Neutral, improving to Beneficial in the long-term	Significant & Neutral-Beneficial
15	View looking north-northeast from the junction of DDR south & New Road	Medium	Slight significance, adverse and short-term.	Low-Medium	Slight-Moderate	Neutral & Permanent	Significant & Neutral-Beneficial
16	View looking north from open space opposite No. 5 The Drive Balmoston	Medium	Moderate, Adverse and short term.	Low	Slight	Neutral & Permanent	Significant and Beneficial.
17	View looking northeast from the Pedestrian Bridge over the Railway Station	Medium	Slight, neutral and short-term.	Negligible	Not significant	Neutral & Permanent	Slight & Neutral
18	View looking southwest from Quay Road, Portrane	High	No construction impacts	No change	-	-	No cumulative impacts
19	View looking northwest from the coast path	High	No construction impacts	No change	-	-	No cumulative impacts



VP	Location	Sensitivity	Construction Phase Visual Impact and Effects	Operational Phase Visual Impact and Effects			Cumulative Visual Impact and Effects
				Magnitude of Change	Significance	Quality and Term	
20	View looking northwest from the Shoreline Hotel and environs	High	No construction impacts	No change	-	-	No cumulative impacts
21	DDR looking north-west	Medium	Moderate significance, adverse and short-term.	High	Significant	Beneficial & Permanent	Very significant and beneficial.
22	DDR looking northwest	Medium	Moderate, adverse and short-term	Medium	Moderate	Beneficial and Permanent	High resulting in Significant and Beneficial.



Visual effects on the Portrane (St Ita's) Demesne ACA

Viewpoints 11, 12, 13, 18, 19 and 20 are in or representative of the Portrane Demesne ACA.

Viewpoint 11 experiences no change i.e. the development is not visible and there is no cumulative impact.

Viewpoint 12 experiences an imperceptible effect i.e. the barely perceivable and there is no cumulative impact.

Viewpoint 13 experiences a significant but neutral effect. The elevation of the development is visible at a distance along the DDR, There is cumulative impact with adjacent development along the DDR also.

Viewpoints 18 -20 experience no visual change i.e. the development is not visible and there is no cumulative impact.

Therefore the effect on the demesne and ACA is minimal and localised. Mitigation is integral to the design and layout to minimise adverse effects generally and specifically on the ACA and protected coastal landscape, whilst allowing a new urban neighbourhood to be built out on zoned lands.

14.6.5 Do Nothing Scenario

The 'do-nothing' impact refers to the non-implementation of the Proposed Development. The primary effect of this would be that the impacts and effects identified above would not directly occur. In this regard, the following issues are relevant.

In the absence of the Proposed Development, this site would continue to operate as an open, abandoned network of fields. Its landscape, biodiversity and recreational values would continue to change and it would detract from the evolving urban area. Depreciation and reduced activity could see the increase of antisocial behaviour and fly tipping on the site. The objectives of the Development Plan and LAP would not be realised in relation to the site and the purpose and investment in the DDR would not be realised.

14.7 Mitigation Measures

The following recommendations are put forward to mitigate against any negative impacts identified above and to reinforce the positive impacts of the Proposed Development. Mitigation measures are proposed and considered only in relation to the Proposed Development.

14.7.1 Construction Phase

During construction, there will be a notable change to the land use and activity on the site, that is likely to generate negative visual impacts for residents in, and visitors to, areas adjacent to the site.

The remedial measures proposed revolve around the implementation of appropriate site management procedures – such as the control of site lighting, storage of materials, placement of compounds, delivery of materials, car parking, etc. Visual impact during the construction phase will be mitigated somewhat through appropriate site management measures and work practices to ensure the site is kept tidy, dust is kept to a minimum, and that public areas are kept free from building material and site rubbish.

Site hoarding will be appropriately scaled, finished and maintained for the period of construction of each section of the works as appropriate. To reduce the potential negative impacts during the construction phase, good site management and housekeeping practices will be adhered to. The visual impact of the site compound and scaffolding visible during the construction phase are of a temporary nature only and therefore require no remedial action other than as stated above. It is noted that a Construction Environmental Management Plan (CEMP) has been prepared by DBFL Consulting Engineers (2025), as submitted under separate cover.

Existing trees and woodlands to be retained are shown in the Landscape Strategy Report prepared by CSR (included under separate cover as part of this planning application) and Arboricultural Impact Assessment & Method Statement and associated drawings prepared by John Morris Arboricultural Consultancy (included under separate cover as part of this planning application). Existing trees to be retained are particularly sensitive to negative impacts during the construction phase if proper protection measures are not adhered to. With regard to the protection of the retained trees on site during proposed construction works, reference should be made to 'BS5837: Trees in relation Design, Demolition and Construction – Recommendations' (BSI, 2012). Tree protection details have been included in the Arboricultural Impact Assessment & Method Statement and associated drawings (included under separate cover as part of this planning application).

Adverse impacts both during construction and operational phases could be mitigated through undertaking appropriate measures listed under **Table 14.11**, in order to soften and screen views as early on as possible.

Reducing the footprint of all construction works wherever feasible and ensuring the remainder of the land is retained as green field will also limit any adverse effects during the construction phase.

Table 14.11 Mitigation Measures – Construction Phase

Character of potential impact	Mitigation measure
Visual impact of construction works	Follow appropriate site management procedures, including control of site lighting, storage of materials, placement of compounds, delivery of materials, car parking, etc.
Landscape character	Maintain the character of the site by installing proposed planting in accordance with the proposed landscape plans by CSR Landscape Architects, included separately as part of this planning application.
Existing vegetation	To protect trees to be retained particularly those forming structural elements of the Portrane ACA , fell adjacent trees to be removed and grind out stumps in accordance with BS5837:2012.
	Tree / hedgerow protection works to be carried out in accordance with Arboricultural Impact Assessment & Method Statement and associated drawings prepared by John Morris Arboricultural Consultancy (included under separate cover as part of this planning application).

14.7.2 Operational Phase

The design of the Proposed Development incorporates significant consideration in respect of best practice layouts and for successful integration into the receiving environment. The architectural layout aims to address visual impacts by proposing variety in scale and massing of buildings. Elevations and materiality complement local styles and character.

The retention of hedgerows and trees, where feasible, and the planting of additional trees and shrubs throughout the site and open spaces, where possible, will reduce the visual mass of the buildings, soften and partially screen the development over time from various viewpoints, as identified in the assessment, thereby minimising the visual impacts while creating quality of place and residential amenity. The landscape design strategy creates an open space system through the wider masterplan area, using the retained hedgerow system, creating a total of 1.73ha of public open space and imparting a maturity to the new development.

Landscape works necessary for the creation of a development of quality are proposed with the effect of also avoiding or minimising adverse effects generated due to the Proposed Development. The planting of substantial numbers of new trees and other planting in the open spaces, the site boundaries and internal roads, both native and ornamental varieties, will enhance the overall appearance of the Proposed Development and compensate for the removal of hedgerows and trees, where needed, for the construction works, and increase the overall landscape capacity of the site to accommodate development. Native and appropriate planting for biodiversity has been incorporated into the scheme in accordance with the advice of the Project Ecologist (refer to Chapter 8 – Biodiversity).

Public open spaces have been designed as part of an overall design strategy that focuses on creating a 'sense of place' and individual character for the development area. The quality of the public realm scheme is of a high standard and the quality of materials proposed is similarly high and robust.

Best practice horticultural methods will be applied to ensure that mitigation measures establish and grow appropriately. Landscape tender drawings and specifications will be produced to ensure that the landscape work is implemented in accordance with best practice. This document will include tree work procedures, soil handling, planting and maintenance.

In conclusion, mitigation is adequately delivered as an integral part of the design of the Proposed Development, without the need for further mitigation measures to address residual effects.

14.7.3 Cumulative Mitigation

No potential significant cumulative effects were assessed and therefore no cumulative mitigation measures are required.

14.7.4 'Worst-case' Scenario

The 'worst-case' scenario would be if the Proposed Developments failed to safeguard any of the existing valued landscape features or was laid out in a way that failed to respond to surrounding landscape and townscape character, scale, sensitivities and views. Similarly, if the Proposed Developments are approved but failed to integrate proposed green infrastructure and if the positive attributes of the design and mitigation measures were not carried through in full or enforced by the Local Authority.

14.8 Residual Impacts

Given the planning policy for the area, development of this site is inevitable, and it is considered likely that any proposed viable development will give rise to impacts of a similar nature. While the intensification of land use, as it changes from now neglected farmland/partial construction site into a residential development is a change that cannot be entirely mitigated, the proposals reflect best practice in residential area layout, and the concepts in the wider Masterplan, and will consolidate the urban area here with an overall beneficial effect locally and to the wider surrounding area.

No adverse residual impacts are predicted in relation to landscape and visual amenity.

14.9 Indirect and /or Secondary Impacts

There are no potential significant indirect and or secondary landscape or visual impacts arising from this Proposed Development.

14.10 Monitoring

14.10.1 Construction Phase

Landscape and visual mitigation measures will be monitored during the construction stage. This will include siting of the construction compound; protection of trees / hedgerows to be retained; stripping and storage of topsoil; reinstatement of landscape / soil areas; and completion of landscape works.

Tree and hedgerow removal will be monitored by project arborist throughout the construction phase. Their oversight will ensure that only approved vegetation is removed, best practice methods are followed, and retained features are protected. The planting works will be undertaken in the next available planting season after completion of the main civil engineering and building work.

14.10.2 Operational Phase

This will consist of weed control, replacement planting, pruning etc. All landscape works will be in an establishment phase for the initial three years from planting. The company or public agency responsible for site management of the scheme will be responsible for the ongoing maintenance of the site after this three-year period is complete.

14.10.3 Reinstatement

The proposed landscape development works in the form of tree and shrub planting will be used to reinstate the site, post-construction. These works will be carried out by an appointed landscape contractor and will be supervised by a suitably qualified landscape architect or manager.

14.11 Interactions

The pertinent environmental interactions for landscape and visual are with:

- Chapter 7: Population & Human Health;
- Chapter 8: Biodiversity, and
- Chapter 15: Cultural Heritage, Archaeology & Architectural Heritage.

Population and Human Health

The landscape and visual aspects of the Proposed Development have the potential to influence population and human health through changes in visual amenity and the character of the surrounding environment. The presence of construction activities and alterations to existing landscape features may temporarily affect the visual experience for nearby residents and road users. However, mitigation measures such as screening, sensitive design, and phased landscaping will help reduce adverse impacts and support the overall well-being of the local population. This results in generally **adverse short term** effects during construction phase, and once the landscaping, tree planting and open spaces are established during the operational phase, this effect will improve to **neutral to beneficial in long term**.

Biodiversity

In this regard, landscape proposals for the scheme have been developed in consultation with the Project Ecologist and the cultural heritage consultants.

Landscape and visual changes interact closely with biodiversity, particularly where vegetation removal occurs. Arboricultural monitoring and the implementation of ecological mitigation and protection measures are to be followed during construction phase to avoid any impacts on biodiversity, and landscape and visual impacts.

Generally, effects are **adverse, short-term** lasting during the construction phase, and once the landscaping, tree planting and open spaces are established this effect will improve to **neutral-beneficial in long term**.

For a detailed description of the biodiversity at the site, refer to Chapter 8 (Biodiversity).

Cultural Heritage, Archaeology & Architectural Heritage

Visual impacts on cultural heritage assets are a key consideration in the landscape assessment. Appropriate measures have been taken to mitigate impact on the ACA. **No adverse interactions** have been identified on Cultural Heritage, Archaeology & Architectural Heritage during the preparation of this landscape and visual impact assessment chapter. For further information, refer to Chapter 15 (Cultural Heritage, Archaeology & Architectural Heritage).

Therefore, **neutral** during construction and operational phase.

No significant impacts are predicted in relation to any of the above-listed interactions with during construction or operational phase.

14.12 Difficulties Encountered

There were no specific difficulties encountered during the preparation of the landscape and visual impact assessment.

14.13 References

- Guidelines for Landscape and Visual Impact Assessment, 3rd Edition 2013, published by the UK Landscape Institute and the Institute of Environmental Management and Assessment (referred to as the GLVIA).
- Guidelines on the information to be contained in Environmental Impact Assessment Reports (May 2022), published by the Environmental Protection Agency.

- Fingal Development Plan 2023-2029.

Chapter 15 : Cultural Heritage, Archaeology and Architectural Heritage

The full chapter has been included in this Addendum for clarity as new text has been provided or text has been changed in a number of places in the chapter. New and/or changed text is highlighted in red in the following.

15.1 Introduction

This Cultural Heritage, Archaeology & Architectural Heritage study undertaken at Ballymastone, Donabate, Co. Dublin (**Figure 15.1**) was prepared by Archer Heritage Planning Ltd on behalf of Glenveagh Living Ltd. The objective of the study was to identify and record the location, nature and dimensions of archaeological or cultural heritage features, fabric or artefacts that may be impacted by Proposed Development, gauge the level of impact and include recommendations for potential mitigations necessary. The study included an examination of existing documentary sources, which was completed in tandem with licensed archaeological investigations.

The study was undertaken by Aidan O'Connell BA MIAI, Senior Archaeologist with Archer Heritage Planning Ltd, who has over 20 years experience in archaeological and cultural heritage impact assessments. He has been eligible to conduct licenced archaeological excavations (under Section 26 of the National Monuments Act 1930 (as amended)) since 2002. The archaeological component of the EIAR was coordinated by Ciaran McGuinness CPA, MBA, Cert Proj. Mgm., who has over 20 years professional experience in archaeological consultancy and project management.

A detailed description of the Proposed Development is provided in Chapter 5 (Description of the Proposed Development), with particulars of the proposal reiterated in this Chapter only insofar as they relate to the assessment of impacts on the cultural, archaeological and architectural heritage resource.

The Proposed Development will consist of the construction of a residential development, which represents Phase 3 of the wider development of the Ballymastone Lands, ranging in height from 2- to 6-storeys, to accommodate 433 no. residential dwellings (including a mix of apartments, duplexes and houses), private amenity space, a crèche (c. 567sq.m), and a community space (c. 215sq.m). The site will accommodate 323 no. car parking spaces in total (comprised of 296 no. residential spaces, 9 no. spaces for the crèche, 1 no. accessible EV space, 2 no. standard (ducted) accessible spaces, 5 no. standard EV spaces, and 10 no. standard (ducted) spaces), 1,472 total no. bicycle parking spaces, new pedestrian/cycle links, road improvements, storage, services (including water, wastewater, electricity and telecommunications) and plant areas. Landscaping will include communal amenity areas, significant public open space (c. 17% of the overall site), and SuDS features.

In summary, the Proposed Development will consist of the construction of a residential development, which represents Phase 3 of a wider development of the Ballymastone Lands (as identified in the Donabate Local Area Plan 2016 (as extended)) and is a continuation of Phases 1–2 of the Masterplan lands (permitted under LRD0008/S3; ABP 315288 & LRD0039/S3; ABP 320885). The Proposed Development ranges in height from 2 to 6 storeys to accommodate 398 residential dwellings (including a mix of apartments, duplexes and houses), private amenity space, a crèche and a community space. The site will accommodate car parking spaces, bicycle parking spaces, storage, services, new

pedestrian/cycle links, road improvements and plant areas. Landscaping will include communal amenity areas, and a significant public open space provision.

15.2 Method

15.2.1 Desk-based Study

A study area was established at a distance of 500m from the outer edge of the redline area and encompassing an area of 170.50 Ha. The Cultural Heritage and Archaeology study included a desk-based study where relevant databases and sources were consulted to determine the archaeological potential of the general area. The consulted sources included:

15.2.1.1 Record of Monuments and Places (RMP)/ Sites and Monuments Record.

The Record of Monuments and Places (RMP) is a statutory inventory of archaeological sites protected under the National Monuments Acts 1930-2014 (Section 12, 1994 Act), compiled and maintained by the Archaeological Survey of Ireland (ASI). The inventory concentrates on pre-1700 AD sites and is based on a previous inventory known as the Sites and Monuments Record (SMR) which does not have legal protection or status (see www.archaeology.ie).



Figure 15.1 Site Location

15.2.1.2 Topographical Files of the National Museum of Ireland

The National Museum of Ireland Topographical Files is the national archive of all known antiquities recorded by the National Museum listed by county and townland/ street. These files relate primarily to artefacts but also include references to monuments and contain a unique archive of records of previous archaeological excavations. The Museum files present an accurate catalogue of objects reported to that institution from 1928.

15.2.1.3 Aerial Photography

Aerial photography (and other forms of remote sensing) may reveal certain archaeological features or sites (earthworks, cropmarks, soil marks) that for many reasons may not be appreciated at ground level. There are a number of available collections including the National Monuments Section, Geological Society of Ireland (1970–73), Ordnance Survey of Ireland (1995, 2000, 2005), National Museum of Ireland (St Joseph CUCAP Collection) and Air Corps (1950s–1970s).

15.2.1.4 Historical Maps

Analysis of historic mapping can show human impact on landscape over a prolonged period. Large collections of historical maps (pre- and early Ordnance Survey maps as well as estate or private maps) are held at the Glucksman Map Library, Trinity College and other sources (UCD Library, Ordnance Survey Ireland, local libraries and published material).

15.2.1.5 Record of Protected Structures & National Inventory of Architectural Heritage

Local Authorities have a statutory responsibility to safeguard architectural heritage in accordance with Part IV of the Planning and Development Act 2000 (as amended). Under S.51 (1), a County Council must compile a Record of Protected Structures (RPS), which lists all structures that are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. The protection, unless otherwise stated, includes the exterior and interior of the structure, lands lying within its curtilage (boundary), other structures and their interiors within the curtilage, plus all fixtures and fittings that form part of the interior or exterior of any of these structures. Buildings can be added to, or deleted from the RPS at any time, though generally this occurs when the county development plan is being reviewed.

The National Inventory of Architectural Heritage (NIAH) was established on a statutory basis under the provisions of the Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act 1999. Its purpose is to identify, record, and evaluate the post-1700 architectural heritage of Ireland, uniformly and consistently as an aid in the protection and conservation of the built heritage. It is intended to provide a basis for recommendations of the Minister for Culture, Heritage and the Gaeltacht to Local Authorities for the inclusion of particular structures in Records of Protected Structures (RPS).

15.2.2 Field Survey

The desk-based study was supported by several field-based surveys that investigated the potential of the site to contain unrecorded archaeological material. These surveys were as follows:

15.2.2.1 Site Walkover Survey

Visual inspection of the site was undertaken in June 2021 as part of the licence application process. This involved a systematic, non-intrusive walkover survey. This survey assessed current land-use patterns, site topography, site access and the presence of any previously unrecorded sites of archaeological and cultural heritage interest in line with current best practice guidelines (see TII 2024).

15.2.2.2 Test Excavation

Archaeological test excavation was undertaken at the site from 20 July to the 11 August 2021 under licence 21E0453 from the Department of Housing, Local Government and Heritage (DHLGH) in consultation with the National Museum of Ireland (NMI) (O’Connell 2019; Appendix 15.1). The aim of the test trenching was to test geophysical anomalies recorded in previous works commissioned for the Donabate Local Area Plan (2016) and to test the general archaeological potential of the site.

15.2.2.3 Archaeological Excavation

Full archaeological excavation was undertaken across a range of sites in advance of development within the wider Ballymastone Masterplan lands. Four of these excavations related to sites identified within the Phase 3 Area (Archaeological Areas 5–8; see Appendix 15.2–15.5).

15.2.3 Guidance and Legislation

Archaeological and cultural heritage protection in Ireland is provided by several international and national mechanisms. These include but are not limited to:

- National Monuments Acts 1930-2014;
- Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act, 1999’;
- Planning & Development Act 2000 (as amended);
- European Convention on the Protection of the Archaeological Heritage 1992.

The Framework and Principles for the Protection of the Archaeological Heritage (1999) publication outlines the State’s general principles in relation to the management and protection of archaeological heritage. It states that avoidance of developmental impacts on archaeological heritage and preservation *in situ* of archaeological sites and monuments are always the preferred option. When a site, or part of a site, must be removed due to development, then preservation by record must be undertaken (i.e. through licensed excavation and recording).

The Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023 was enacted on 13th October 2023. However, while the Act is now law, most of its provisions will not enter into force until the Minister has made one or more of what are known as “Commencement Orders”. As of now (August 2025), only a small number of Commencement Orders have been made relating to the treatment of Archaeological Archives and Underwater/Marine Heritage. The remaining sections of the National Monuments Acts 1930 to 2014 remain in force at the time of writing.

The Fingal Development Plan 2023-29 sets out general policies and standards for development within the county. The current plan contains lists of cultural heritage sites, including national monuments, recorded monuments and protected structures within the administrative areas. Fingal County Council recognises the value and significance of the county’s archaeological heritage, and the importance of

fostering a greater public appreciation of this heritage. Through policies and objectives contained in this Development Plan, the Council is dedicated to protecting, conserving and presenting the County's rich cultural heritage while promoting sustainable economic development and the enrichment of the environment. A selection of relevant objectives contained in the Development Plan is provided below:

- **Policy HCAP2 – Importance of Archaeological Resource** Recognise the importance of our archaeological resource and provide appropriate objectives to ensure its appropriate retention, promotion and recording.
- **Policy HCAP3 – Record of Monuments and Places/ Sites and Monuments Record** Safeguard archaeological sites, monuments, objects and their settings listed in the Record of Monuments and Places (RMP), Sites and Monuments Record (SMR), underwater cultural heritage including protected wrecks and any additional newly discovered archaeological remains.
- **Policy HCAP4 – Preservation-in-situ** Favour the preservation in-situ (or at a minimum preservation by record) of all sites and features of historical and archaeological interest.
- **Objective HCAO1 – Preservation-in-situ** Favour the preservation in situ or at a minimum preservation by record, of archaeological sites, monuments, features or objects in their settings. In securing such preservation the Council will have regard to the advice and recommendations of the National Monuments Service of the Department of the Housing, Local Government and Heritage
- **Objective HCAO2 – Protection of RMPs/SMRs** Protect all archaeological sites and monuments, underwater archaeology, and archaeological objects, which are listed in the Record of Monuments and Places, Wreck Inventory of Ireland and all sites and features of archaeological and historic interest discovered subsequent to the publication of the Record of Monuments and Places, and to seek their preservation in situ (or at a minimum, preservation by record) through the planning process.
- **Objective HCAO3 – Management of Archaeological Resource** Encourage and promote the appropriate management and maintenance of the County's archaeological heritage, including historical burial grounds and underwater cultural heritage in accordance with conservation principles and best practice guidelines.
- **Policy HCAP5 – Development Design** Incorporate heritage features into infrastructure design at an early stage in the development planning and management process to protect and promote the cultural heritage resource and create awareness and interpretation.
- **Objective HCAO7 – Archaeology and Development Design** Ensure archaeological remains are identified and fully considered at the very earliest stages of the development process, that schemes are designed to avoid impacting on the archaeological heritage.
- **Objective HCAO9 – Archaeology in the Landscape** Ensure that in general development will not be permitted which would result in the removal of archaeological monuments with above ground features, protected wrecks and that this will be especially the case in relation to archaeological monuments which form significant features in the landscape.
- **Objective HCAO10 – Context of Archaeological Monuments** Ensure that development within the vicinity of a Recorded Monument or Zone of Archaeological Notification does not seriously detract from the setting of the feature and is sited and designed appropriately.
- **Objective HCAO11 – Impacts of large-scale development** Ensure that proposals for large scale developments and infrastructure projects consider the impacts on the archaeological heritage and seek to avoid them.

- **Objective HCAO13 – Findings of Archaeological Activity** Encourage reference to or incorporation of significant archaeological finds into development schemes, where appropriate and sensitively designed, through layout, in situ and virtual presentation of archaeological finds and by using historic place names and the Irish language where appropriate.
- **Objective HCAO14 – Archaeology in Open Space** Retain and manage appropriately archaeological monuments within open space areas in or beside developments, ensuring that such monuments are subject to an appropriate conservation management plan, are presented appropriately and are not left vulnerable, whether in the immediate or longer term, to dangers to their physical integrity or possibility of loss of amenity.
- **Objective HCAO15 – Best Practice** Promote best practice for archaeological excavation by ensuring that they are undertaken according to best practice as outlined by the National Monuments Service, Department of Housing, Local Government and Heritage, The National Museum of Ireland and the Institute of Archaeologists of Ireland.
- **Objective HCAO17 – Dissemination** Ensure the public dissemination of the findings of licenced archaeological activity in Fingal through the Dublin County Archaeological GIS project, publications, public lectures and events to promote awareness of, and access to, Fingal's archaeological inheritance and foster high quality community archaeology.
- **Objective HCAO18 – Public Awareness** Raise public awareness of the cultural heritage and improve legibility by providing appropriate interpretation in areas, sites, villages, and buildings of archaeological and historic significance.
- **Objective HCAO15 – Best Practice** Promote best practice for archaeological excavation by ensuring that they are undertaken according to best practice as outlined by the National Monuments Service, Department of Housing, Local Government and Heritage, The National Museum of Ireland and the Institute of Archaeologists of Ireland.
- **Objective HCAO17 – Dissemination** Ensure the public dissemination of the findings of licenced archaeological activity in Fingal through the Dublin County Archaeological GIS project, publications, public lectures and events to promote awareness of, and access to, Fingal's archaeological inheritance and foster high quality community archaeology.
- **Objective HCAO18 – Public Awareness** Raise public awareness of the cultural heritage and improve legibility by providing appropriate interpretation in areas, sites, villages, and buildings of archaeological and historic significance.
- **Policy HCAP11 – Conservation of Architectural Heritage** Conserve and protect buildings, structures and sites of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest by adding or retaining them on the Record of Protected Structures or by designating groups of structures as Architectural Conservation Areas.
- **Policy HCAP14 – Architectural Conservation Areas** Protect the special interest and character of all areas which have been designated as an Architectural Conservation Area (ACA). Development within or affecting an ACA must contribute positively to its character and distinctiveness and take opportunities to protect and enhance the character and appearance of the area and its setting wherever possible. Development shall not harm buildings, spaces, original street patterns, archaeological sites, historic boundaries or features, which contribute positively to the ACA.
- **Policy HCAP15 – Character of Architectural Conservation Areas** Support and encourage the sympathetic and appropriate adaptive reuse, refurbishment, and upgrading of protected structures

and buildings or structures that contribute to the character of an Architectural Conservation Area ensuring that their special interest, character and setting is retained. Prohibit development that seeks the demolition of a Protected Structure or buildings that contribute to the character of an ACA in almost all circumstances.

- **Policy HCAP19 – Development and Historic Demesnes** Resist proposals or developments that would lead to the loss, or cause harm to the character, principal components or setting of historic designed landscapes and demesnes of significance in the County.
- **Objective HCAO31 – Protection of Designed Landscapes** Identify the historic designed landscapes of significance in the County and determine the appropriate mechanism to ensure their future protection. Several of the most significant are already designated, as Architectural Conservation Areas.
- **Objective HCAO32 – Designed Landscape Appraisal** Require that proposals for development within historic designed landscapes include a Designed Landscape Appraisal (including an ecological assessment) as part of the planning documentation to fully consider the potential impacts of the proposal. The appraisal should be carried out prior to the initial design of any development, in order that this evaluation to inform the design which must be sensitive to and respect the built heritage elements and green space values of the site.
- **Objective HCAO63 – Naming of Residential Schemes** Ensure that the naming of mixed residential and mixed-use schemes reflect local history, folklore and/or place names and are stated in the Irish language.

15.2.4 Aims of Study

The objective of this study was to assess the significance of the receiving archaeological and architectural environment and the impact of the Proposed Development. Ameliorative measures are proposed where necessary and feasible, to safeguard any monuments, features or finds of antiquity that are identified during this study as likely to sustain significant impacts.

15.3 Baseline Environment

15.3.1 Brief Historical Background

In the early medieval period, Donabate formed part of the kingdom of Brega, initially ruled by a dynastic confederation known as the Laigin, but after the seventh century was under the rule of the Síol nAedo Sláine of the Southern Uí Neill. After the area came under the control of the Anglo-Normans in the late twelfth century, the lands around Donabate came under the control of the Archbishop of Dublin, who had his episcopal manor at Swords, Co. Dublin. Around 1230 AD, Donabate church was granted to the monastery of Grane, Co. Carlow and remained in their possession until the dissolution of the monasteries in 1541 (Bates 2001). In the eighteenth century, an extensive tract of land around Donabate was purchased by Charles Cobbe, later Archbishop of Dublin.

The first portion of the name Donabate (Domhnach Bat) most likely originates from the word Domhnach meaning church and Baite meaning wet or swampy. Donabate is also said to derive its name from the Irish 'Domhnach Bat' or 'Dún a' Bháid' meaning church of the ferry, which is supposed to refer to an ancient church in the townland of Ballymadrough west of Donabate near the Malahide Estuary.

The townland of Ballisk (*Baile Uisce*) gained its name from *baile* – town/ home/ homestead and *uisce* – water. The townland of Ballalease North (*Baile Eilís Thuaidh*) gained its name from *baile* – town/ homestead and *Eilís* – a woman’s name, suggesting the homestead/ area once belonged to *Eilís*. The origins of the townland name Ballymastone are less clear. Both the townlands of Ballymastone (spelled Balmasto) and Ballisk (spelled Balilisk) are noted on the Down Survey map (1656). It was also noted on this map that the Donabate townland of 117 acres was forfeited by Anthony Delahide of Lockhumny (probably Loughshinny) to Lord Fitzharding sometime between 1641 and 1670. The townland name Portrairie is derived from ‘*Port-Rachrann*’; the port or landing place of *Rachra* and refers maritime connection between the mainland and Lambay Island (Joyce 1910, 111). Joyce (*ibid.*) records the ancient Irish name for the island as ‘*Rechru*’, later modified to ‘*Rachra*’ and cites the practice sending sheep across to the island over the spring and summer months for grazing.

15.3.2 Record of Monuments and Places

The Proposed Development is located c. 1km east from the ecclesiastical remains at Donabate:

- DU012-005001; Church
- DU012-005002; Castle – tower house
- DU012-005003; Graveyard
- DU012-005004; Wall monument (present location)

Other significant monuments at Donabate village include a medieval enclosure and structures at Turvey Avenue (DU012-082001-004) and early prehistoric settlement activity at Beaverstown (DU012-066).

There are no Recorded Monuments located within the redline boundary for the Proposed Development. However, there are four archaeological sites located within the wider study area. These are:

- DU012-084 – Ring-ditch;
- DU012-085 – Ring-ditch, and;
- DU012-088 – Enclosure;

Those monuments were recorded during previous archaeological assessments carried out in support of the Donabate Local Area Plan (see below **Section 15.3.7**; licence numbers 05R012, 07E0650 and 06E0027) and the pre-development archaeological assessments for the Donabate Distributor Road (licence numbers 17E0094 and 17E0407). A selection of RMP entries relevant to this area and within 1km of the subject site are presented below in **Table 15.1**. They include medieval remains within Donabate Village, Beaker Period (2450-2300 BC) settlement at Beaverstown and Bronze Age burnt mounds at Corballis. The location of recorded monuments within the subject site and across the surrounding landscape is indicative of enhanced archaeological potential.

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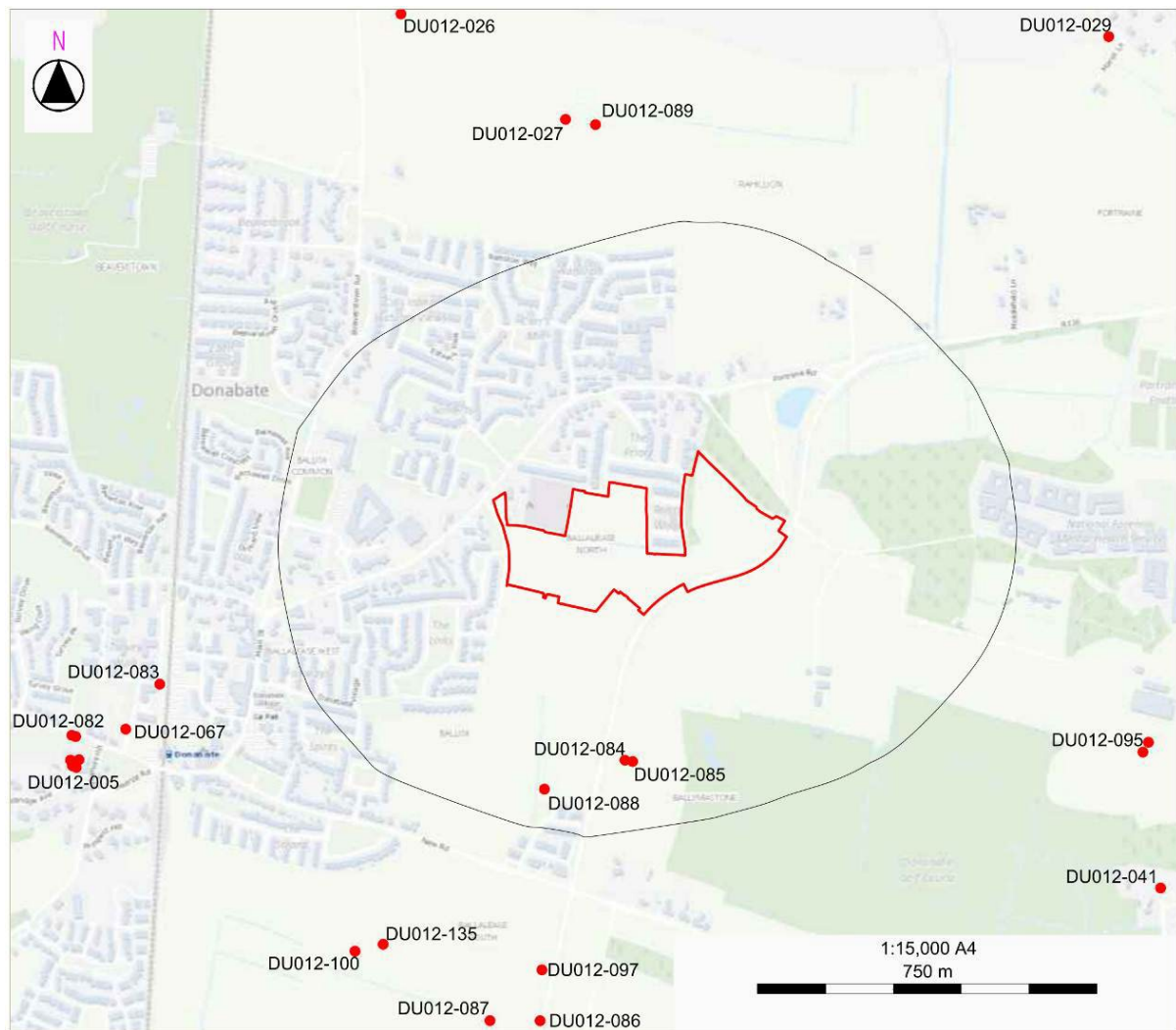


Figure 15.2 Record of Monuments and Places

Table 15.1 RMP Entries within 1km of Proposed Development Site

SMR Number	Class	Townland	ITM	Distance
DU012-084----	Ring-ditch	Beaverstown	723679, 749981	0m
This monument was subject to geophysical survey (Licence no. 05R012) and test excavation (Licence no. 06E0027) to inform the Donabate Local Area Plan. A circular ditch (5.45m diam.) and possible post or pit were identified. Although no diagnostic material was recovered, it was interpreted on the basis of morphology as a probable prehistoric hut (Baker 2006, 17).				
DU012-085----	Ring-ditch	Ballymastone	723695, 749978	0m
This monument was subject to geophysical survey (Licence no. 05R012) and test excavation (Licence no. 07E0650) to inform the Donabate Local Area Plan. A possible ring ditch (8m diam.) was identified. (Frazer 2007).				
DU012-088----	Enclosure	Ballymastone	723504, 749918	0m
This monument was subject to geophysical survey (Licence no. 05R012) and test excavation (Licence no. 07E0650) to inform the Donabate Local Area Plan. A ditched (1m wide) circular enclosure (50m diam.) was identified. (Frazer 2007).				
DU012-097----	Ring-ditch	Corballis (Nethercross By.)	723499, 749530	500m S
Situating in tillage on the edge of the broad crest of a ridge, with extensive views in all directions. The sea is in view to the E and the Broadmeadow River estuary lies to the S. First identified in a geophysical survey in 2005 along with a burnt mound (DU012-086----) at the base of the slope to the S in the same field. Another burnt mound (DU012-087----) was identified in that geophysical survey in the adjoining field to the SW (Baker, 2006a; Frazer 2007a). Test excavations were carried out at the site in in 2006 (Licence No. 06E0027) and the ring-ditch was fully excavated in 2017 in advance of the construction of the Donabate Distributor Road by Liam Coen working with Archer Heritage Planning (Licence No. 17E0407). The site consists of a circular area (diam c. 16m) defined by an enclosing fosse which was recut. The first phase of activity consisted of the excavation of a ring-ditch defined by a broad, fairly deep v-shaped fosse. The fill of this was largely undifferentiated, comprising of a sterile fill which gave the appearance of having been backfilled very quickly after having been dug – there was no silting at the base. The upper ring-ditch which was recut into the earlier fosse was a shallow u-shaped fosse, filled with a darker, charcoal-rich fill with an entrance to the E. This was defined by two rounded terminals with a single central post pit at the centre. No features were recorded in the interior. A stone bead with a central waist somewhat reminiscent of a dumbbell bead, some lithics and burnt bone were recovered from the upper ditch fill.				
DU012-100----	Enclosure	Corballis (Nethercross By.)	723094, 749570	585m SW
A substantial ditch enclosure was initially identified in the course of geophysical survey and confirmed as archaeological in origin by test trenching (McLoughlin 2007), the site occupies an area of roughly 65m x 25m in extent. Further test-excavation revealed the ditch to be 1.95m wide and 1.25m deep. Bone, charcoal and a copper object were recovered. A preliminary interpretation of enclosed settlement of the early medieval period has been made (O'Connell 2017).				
DU012-135----	Souterrain	Corballis (Nethercross By.)	723154, 749585	540m SW
Situating in a large rectangular arable field just SE of Donabate village along New Road. An arc of housing occupies the NE quadrant of the field. The field is cultivated into NNE-SSW running ridge and furrow, newly planted with cabbage plants. On a S-facing slope, down from the crest of an E-W running ridge, an oval area of ground (L20m, Wth 8m) has been skirted by a planting tractor in avoidance of lower ground within. At the centre of this area is a sunken hollow (D 0.25m) within which is a large capstone, (L1.0m; Wth 0.54m) set along				

SMR Number	Class	Townland	ITM	Distance
an ESE – WSW axis and embedded within the ground, below the ploughsoil. This is edged by an adjacent boulder (L.O.50) and another stone lies to the S. The upper surface of the capstone, which is triangular in section, slopes NNE and SSW, has spalls have been removed from its upper surface in the past, probably through plough damage. The capstone or lintel is indicative of the presence of a souterrain. No entrance point to the souterrain is visible save approximately 13m downslope another small dip in the topography of the ploughsoil. No variations in soil texture or colour were observed at the time of the site visit indicating that the entrance hole had been infilled some time ago. There is no current access to the souterrain. From a video of the souterrain interior which had been provided to NMS, the souterrain is T shaped in layout. A low passageway exits a small low corbelled beehive chamber of drystone construction. The walls are composed of crude angular and rounded boulders with the upper courses of the passageway walls oversailing to create a corbelled effect but roofed by flat lintels. One passageway is intersected by a taller passageway running at right angles to the former. One of the passageway ends is fairly crudely blocked by roughly coursed boulders while the other may consist of a drop-hole at its end. There are occasional areas of collapse creating an uneven floor surface.				

15.3.3 Topographical Files

The Topographical Files of the National Museum of Ireland were searched for the townlands of Ballisk, Ballalease North, Corballis, Ballisk Commons, Portraine Demesne, Rahillion and Ballymastone, Co. Dublin. There are considerable collections of flint and chipped stone artefacts from further south at Corballis. However, objects of metalwork from Donabate and its immediate surrounds may be indicative of medieval and/or later settlement. No objects are recorded in Ballisk or Ballease North.

Table 15.2 Topographical Files

Number	Type	Location
1946:444-59	Flint objects	Corballis
P1950:34	Human remains	Corballis
P1950:34.1	Soil sample	Corballis
P1950:34.2	Shell sample	Corballis
P1950:35	Stone pebble	Corballis
R2975	Wood figure	Donabate
X4588	Whalebone book	Donabate
1991:127-9	Copper alloy buckle	Donabate
1991:130-2	Copper alloy button	Donabate
1991:133	Copper alloy spur	Donabate
1991:134	Copper alloy buckle	Donabate
1991:135	Lead musket ball	Donabate
1991:136	Copper alloy vessel	Donabate
2009:C1:1	Bronze Badge	Donabate area
2009:C1:2-5	Bronze Buckle	Donabate area
2009:C1:6-8	Copper alloy object	Donabate area
2009:C1:9	Copper alloy mount	Donabate area
2009:C1:10	Copper alloy crucifix	Donabate area
2009:C1:11	Copper alloy mount	Donabate area
2009:C1:12-14	Iron knife	Donabate area
2009:C1:15	Lead object	Donabate area
2009:C1:16	Brass button	Donabate area

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Number	Type	Location
2009:C1:17	Lead weight	Donabate area
2009:C1:18	Copper alloy strap	Donabate area
2009:C1:19	Copper alloy buckle	Donabate area
2009:C1:20	Copper alloy object	Donabate area
2009:C1:21	Lead bead	Donabate area
2009:C1:22-3	Lead musket ball	Donabate area
2009:C1:24	Lead bullet	Donabate area
2009:C1:25	Copper alloy mount	Donabate area
2009:C1:26	Gilt copper alloy button	Donabate area
2009:C1:27-32	Copper alloy button	Donabate area
2009:C1:33	Copper alloy medal	Donabate area
2009:C1:34	Metal medal	Donabate area
2009:C1:35	Copper alloy medal	Donabate area
2009:C1:36	Copper alloy brooch	Donabate area
2009:C1:37	Copper alloy buckle	Donabate area
2009:C1:38	Copper alloy thimble	Donabate area
2009:C1:39	Lead object	Donabate area
2009:C1:40	Copper alloy weight	Donabate area
2009:C1:41-55	Copper alloy coin	Donabate area
2009:C1:56	Copper alloy buckle	Donabate area
2009:C4:509-774	Flint objects	Balcarrick or Corballis, Donabate
2009:C4:775	Flint sample	Balcarrick or Corballis, Donabate
2009:C4:776	Stone sample	Balcarrick or Corballis, Donabate
2009:C4:777	Chert chunk	Balcarrick or Corballis, Donabate
2009:C4:778	Shell sample	Balcarrick or Corballis, Donabate
2009:C4:779	Quartz flake	Balcarrick or Corballis, Donabate
2009:C4:780	Iron nail	Balcarrick or Corballis, Donabate
2009:C4:781	Iron object	Balcarrick or Corballis, Donabate
2009:C4:782-6	Flint objects	Malahide Island/Balcarrick or Corballis
2009:C4:787	Stone	Malahide Island/Balcarrick or Corballis
2009:C4:788	Shell	Malahide Island/Balcarrick or Corballis
2011:C4:174-225	Flint objects	Corballis
2011:C4:226-250	Flint objects	Corballis
2011:C4:251-2	Copper alloy objects	Corballis
2011:C4:253-283	Flint objects	Corballis
2011:C4:284-398	Flint objects	Corballis
2011:C4:399-429	Flint objects	Corballis
2011:C4:430-434	Quartz flakes	Corballis
2011:C4:435-440	Chert chunks	Corballis
2011:C4:441	Chert flake	Corballis
2011:C4:442	Chert blade	Corballis
2011:C4:443-4	Flint pebbles	Corballis
2011:C4:445	Flint flake	Corballis
2011:C4:446	Stone	Corballis
2011:C4:447	Iron object	Corballis

Number	Type	Location
2011:C4:448	Clay pipe	Corballis
2011:C4:449-456	Flint objects	Corballis
2011:C4:457-479	Flint objects	Corballis
2011:C4:480	Stone chunk	Corballis
2011:C4:481-2	Flint objects	Corballis
2011:C4:483-508	Pottery	Corballis
2011:C4:1619-1622	Flint objects	Corballis
2011:C4:1623-1680	Flint objects	Corballis
2011:C4:1681-1737	Flint objects	Corballis
2011:C4:1738-66	Flint objects	Corballis
2011:C4:1767	Shell sample	Corballis
2011:C4:1768	Flint debitage	Corballis
2011:C4:1769	Quartz sample	Corballis
2011:C4:1770	Clay pipe	Corballis
2011:C4:1771	Iron sample	Corballis
2011:C4:1772	Slag sample	Corballis
2011:C4:1773	Stone sample	Corballis
2018:49	Flint flake	Portraine
2002:183	Pottery	Portraine
2002:182	Pottery	Portraine
1997:8	Flint scraper	Portraine
1946:461	Pottery	Portraine
1946:460	Pottery	Portraine
1946:437	Flint chunk	Portraine
1946:436	Flint chunk	Portraine
1946:435	Flint flake	Portraine
1946:434	Flint chunk	Portraine
1946:433	Flint flake	Portraine
1978:21	Flint flake	Beaverstown
1978:20	Flint tool	Beaverstown
1932:5626	Stone axehead	Beaverstown

15.3.4 Cartographic Sources

The following cartographic sources were consulted in the compilation of this assessment:

- Down Survey 1656.
- Rocque 1760
- OSI 6" First Edition 1844
- OSI 6" Third Edition 1906-9

The subject site is depicted as agricultural land and no new features of archaeological potential were noted.

15.3.4.1 Down Survey 1656-8

Donabate ('Donabaita') is marked on the Barony map (**Figure 15.3**) as larger town with a schematic representation of the castle/tower house (DU012-005002) located in the centre of Donabate town. The

townlands of Portrairie, Ballymastone (labelled *Ballmasto*) and Ballisk (labelled *Balilisk*) are labelled on this map. No structures or potential archaeological monuments are marked on the Parish map.



Figure 15.3 Extract from Down Survey map (1656-8)

15.3.4.2 Rocque (1760)

The subject site is depicted as agricultural land situated east of Donabate (Figure 15.4). No potential archaeological features are visible at the subject site.



Figure 15.4 Extract from Rocque (1760)

15.3.4.3 OSI First Edition 6" Map (1844)

The subject site encompasses parts of three townlands; Portraine Demesne, Ballalease North and Ballymastone (**Figure 15.5**). It crosses a number of townland boundaries. The land is depicted as large open fields. There are no structures or monuments depicted within the subject area on this map.

15.3.4.4 OSI 25" Map 1906-9

The site is laid out in agricultural land with no major change to the overall field division and layout other than limited field boundary clearance (**Figure 15.5**). No potential archaeological sites or features were noted.

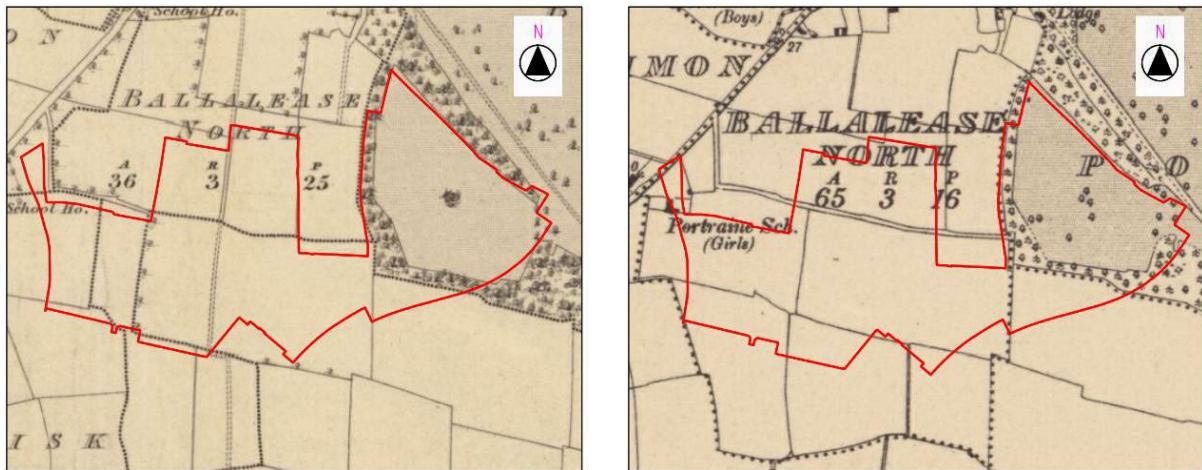


Figure 15.5 Extract from OSI First Edition 6" map (1844) & OSI 25 inch map (1906-9)

15.3.5 Aerial Photography

The following aerial photographic sources were consulted in the compilation of this assessment:

- OSI ortho-rectified aerial photos (1999, 2000, 2005)
- OSI Digital Globe
- Google Earth

The subject site is depicted as agricultural land and no new features of archaeological potential were noted (**Figure 15.6**).



Figure 15.6 Extracts from Aerial Photographs (l Digital Globe 2011-13; Google Earth 06.2018)

15.3.6 Architectural Heritage

The Fingal Development Plan 2023-2029 web viewer¹ was consulted in the preparation of this assessment. There are no Protected Structures located within the site boundary (Figure 15.7). The closest sites of architectural interest are NIAH 1139014 (former school) and NIAH 1139013 (Gate Lodge). They are described thus in the NIAH:

NIAH 11329014

“Detached eight-bay two-storey red brick former school, c.1880, with gable-fronted projecting central block flanked by single-bay single-storey lean-to entrance porches. Single-bay single-storey porch to right gable end, c.2000. Yellow brick rear elevation having two-storey lean-to to rear. Now in apartments. ROOF: Double pitched slate roof; decorative terracotta ridge tiles; granite coping and corbels to gable ends; brick chimneys with granite coping; uPVC rooflight; copper clad spire; catslips roofs to porches; cast-iron rainwater goods. WALLS: Machine made red brick; English garden wall bond; high brick plinth; chamfered brick cornice; limestone carved tablets; yellow brick. OPENINGS: Originally segmental headed openings divided into two with insertion of limestone; brick arches; keystones; reveals and granite and brick cills; uPVC casement windows; squareheaded door and timber panelled door, c.2000”.

NIAH 1139013

“Detached three-bay single-storey gate lodge, c.1870, with canted central bay. Single-bay extension to left-hand side. ROOF: Hipped; slate; central red brick chimney; terracotta ridge tiles; decorative terracotta finial to bay window; flat felt roof to left bay; plastic rainwater goods. WALLS: Rendered plinth; rendered; lined and ruled; rendered quoins. OPENINGS: Square-headed windows; rendered reveals; painted canted sills; 1/1 original sash windows to façade; replacement uPVC frames to side. Square headed door; replacement c.1930's timber door; plate glass overhead”.

The only Protected Structures located within the study area are St. Patrick's RC Church (RPS 512; Redbrick 19th century catholic church) and a 19th century house (RPS 513; 'An Dùn'; stone built house

¹ <https://fingalcoco.maps.arcgis.com/apps/webappviewer/index.html?id=668801631a4745e997c6ccf2cf1cfa51>

with outbuildings). Both are located over 450m west of the Proposed Development and separated from the subject site by existing residential housing.

The northeastern section of the Proposed Development lands is partially located within the ACA for Portrairie – St. Ita’s Hospital Complex. The ACA is described thus in the current Fingal Development Plan:

St Ita’s Hospital is a late 19th century/early 20th century mental hospital complex built on the lands of a former historic demesne of Portrairie House. It is a vast complex of late Victorian/early Edwardian red brick buildings of high architectural merit which dominates the coastal landscape of the Portrairie Peninsula. Through its size and distinctive layout it is unique in Ireland. It is of further special interest as one of a series of asylum complexes, derived from a design developed in Great Britain in the late 19th century, characterised by the ‘echelon’ or arrowhead formation of separate but connected blocks with modest decorative detail. It is notable as one of the largest building projects of the period in the country and in 1900 was the largest building contract ever awarded to a single contractor in Ireland. The outcome of an architectural competition, the design was the work of a distinguished architect G.C. Ashlin (1837-1921) and was heavily influenced by G.T. Hine (1841-1916), an architect well established in the design of asylum buildings in Great Britain. The high architectural merit of the original hospital extends throughout the dispersed ancillary buildings including picturesque cottages and larger houses, farm and industrial buildings which all display decorative features from the same design palette. The carefully selected scenic location of St Ita’s Hospital is a defining element of its character, with the hospital orientated to take full advantage of its coastal setting. Its prominent position dominates the ACA and enables panoramic views to and from the hospital.

There are 60 Protected Structures located within the St. Ita’s Hospital complex (see below **Table 15.3**). These are located c. 1.2 km east of the subject site, on the opposite side of the DDR and screened from the ACA by a dense belt of tree planting.

Table 15.3: Protected Structures

RPS	Building	Description
0801	Administration Building (Building No. 1)	Turn of 20th century five-bay two-storey administration building
0802	Clock Tower (Building No. 2)	Turn of 20th century three-stage clock tower, originally designed to also function as water tower
0803	Building No. 3	Turn of 20th century single-storey, five-bay building
0804	Former Pharmacy (Building No. 4)	Turn of 20th century L-shaped seven-bay single-storey former pharmacy
0805	Stores (Building No. 5)	Turn of 20th century multiple-bay three-storey stores building with long roof lantern
0806	Building No. 6	Turn of 20th century redbrick single-storey building attached to stores (NW)

RPS	Building	Description
0807	Building No. 7	Turn of 20th century redbrick single-storey building attached to stores (NE)
0808	Former Butcher Shop (Building No. 8)	Turn of 20th century detached four-bay single-storey former butcher shop
0809	Former Kitchen/Store (Building No. 9)	Turn of 20th century five-bay single-storey kitchen/store
0810	Stores (Building No. 10)	Turn of 20th century detached single-storey stores
0811	Store (Building No. 11)	Turn of 20th century single-storey store
0812	Former Kitchen (Building No. 12)	Turn of 20th century five-bay single-storey former kitchen with roof lantern
0813	Former Dining Hall (Building No. 13)	Turn of 20th century eight-bay double-height dining hall
0814	Building adjoining Dining Hall (Building No. 60)	Turn of 20th century L-plan four-bay single-storey building with stair tower.
0815	Building adjoining Dining Hall (Building No. 61)	Turn of 20th century four-bay single-storey building
0816	Store (Building No. 62)	Turn of 20th century four-bay single-storey store with roof lantern
0817	St. Dymphna's Church RC (Building No. 14)	Turn of 20th century Roman Catholic church
0818	Boiler & Engine House (Building No. 15)	Turn of 20th century T-plan double height boiler and engine house, including redbrick chimney
0819	Laundry (Building No. 16)	Turn of 20th century laundry building
0820	Former Female Chronic Block (Building 17)	Turn of 20th century nineteen-bay three-storey hospital block
0821	Former Female Semi-Acute Block (Building No. 18)	Turn of 20th century sixteen-bay two-storey hospital block
0822	Former Female Bathhouse (Building No. 19)	Turn of 20th century single-storey former bathhouse
0823	Former Nurses' Accommodation (Building No. 20)	Turn of 20th century seventeen-bay three-storey former nurses' accommodation
0824	Former Female Recent & Acute Block (Building No. 22)	Turn of 20th century seventeen-bay two-storey hospital block

RPS	Building	Description
0825	Former Female Infirmary (Building 23)	Turn of 20th century twenty-one-bay two-storey hospital building
0826	Former Male Infirmary (Building No. 24)	Turn of 20th century sixteen-bay two-storey hospital block building
0827	Former Male Recent & Acute Block (Building No. 25)	Turn of 20th century seventeen-bay two-storey hospital block
0828	Former Male SemiAcute Block (Building No. 26)	Turn of 20th century sixteen-bay two-storey hospital block
0829	Former Male Bathhouse (Building No. 27)	Turn of 20th century single-storey former bathhouse
0830	Former Attendants' Accommodation (Building No. 28)	Turn of 20th century eleven-bay three-storey former attendants' block
0831	Former Male Chronic Block (Building 29)	Turn of 20th century nineteen-bay three-storey hospital block
0832	Workshops/outbuildings (Building No. 30)	Turn of 20th century U-shaped range of single-storey workshops
0833	Workshops (Building No. 31)	Turn of 20th century range of five-bay and eight-bay workshops
0834	Former Fire Station (Building No. 32)	Turn of 20th century gable-fronted single-bay single-storey former fire station
0835	Former Church of Ireland Church (Building No. 33)	Turn of 20th century Anglican church (including T-shaped porch – Building 34)
0836	Circulation System (Building 35)	Turn of 20th century single-storey circulation corridors on octagonal plan and with octagonal towers at nodal points
0837	Former Mortuary (Building No. 36)	Turn of 20th century detached six-bay single-storey former mortuary
0838	No.1 St. Joseph's Cottages	Exterior only of early 20th century three-bay single-storey terraced cottage (former workers' cottages)
0839	No.2 St. Joseph's Cottages	Exterior only of early 20th century three-bay single-storey terraced cottage (former workers' cottages)
0840	No.3 St. Joseph's Cottages	Exterior only of early 20th century three-bay single-storey terraced cottage (former workers' cottages)
0841	No.4 St. Joseph's Cottages	Exterior only of early 20th century three-bay single-storey terraced cottage (former workers' cottages)

RPS	Building	Description
0842	No.5 St. Joseph's Cottages	Exterior only of early 20th century three-bay single-storey terraced cottage (former workers' cottages)
0843	No.6 St. Joseph's Cottages	Exterior only of early 20th century three-bay single-storey terraced cottage (former workers' cottages)
0844	Rushbrook House (Building No. 38)	Early 20th century pair of worker's houses
0845	Westview Lodge (Building No. 40)	Turn of 20th century detached red-brick house
0846	Woodview - East House (Building No. 43)	Early 20th century semi-detached two-storey former redbrick house with canted bay window (in use as offices)
0847	Woodview - West House (Building No. 43)	Early 20th century semi-detached two-storey former redbrick house with canted bay window (in use as offices)
0848	Former Isolation Hospital (Building No. 50)	Early 20th century detached single-storey isolation hospital with wings at oblique angles
0849	Former Isolation Hospital Ancillary Building (Building No. 51)	Early 20th century detached single-storey ancillary building to isolation hospital
0850	No. 1 St. Anne's Terrace	Exterior only of early 20th century three-bay single-storey terraced cottage (former workers' cottages)
0851	No. 2 St. Anne's Terrace	Exterior only of early 20th century three-bay single-storey terraced cottage (former workers' cottages)
0852	No. 3 St. Anne's Terrace	Exterior only of early 20th century three-bay single-storey terraced cottage (former workers' cottages)
0853	No. 4 St. Anne's Terrace	Exterior only of early 20th century three-bay single-storey terraced cottage (former workers' cottages)
0854	No.5 St. Anne's Terrace	Exterior only of early 20th century three-bay single-storey terraced cottage (former workers' cottages)
0855	No. 6 St. Anne's Terrace	Exterior only of early 20th century three-bay single-storey terraced cottage (former workers' cottages)
0856	Fern Lodge (Building No. 57)	Turn of 20th century detached three-bay two-storey L-plan house
0857	Farm Buildings (Building No. 58)	Turn of 20th century farm buildings with half dormers and decorative elements including terracotta creating and finials
0858	Former Handball Alley (Building No. 52)	Mid-20th century mass-concrete handball alley

RPS	Building	Description
0859	Walled Garden	Structural elements of 19th century walled garden
0860	Water Tower	Mid-20th century tapered cylindrical concrete water tower

Also, a gate lodge (NIAH 11329013) is located c. 130 m north of the subject site. This is not a Protected Structure, although it is located within the Portrane ACA. This building is similarly screened from the Proposed Development area by tree planting.

The ACA seeks to protect the character of the hospital complex as built on the lands of a former historic demesne of Portrane House. The core area of the ACA contains numerous Protected Structures. However, there have been significant changes to the wider demesne lands in recent years, principally through the construction of the Donabate Distributor Road. The new road has disturbed the western portion of the historic demesne. Nonetheless, the core area of the ACA remains intact and is screened from the Proposed Development area by a dense belt of trees.

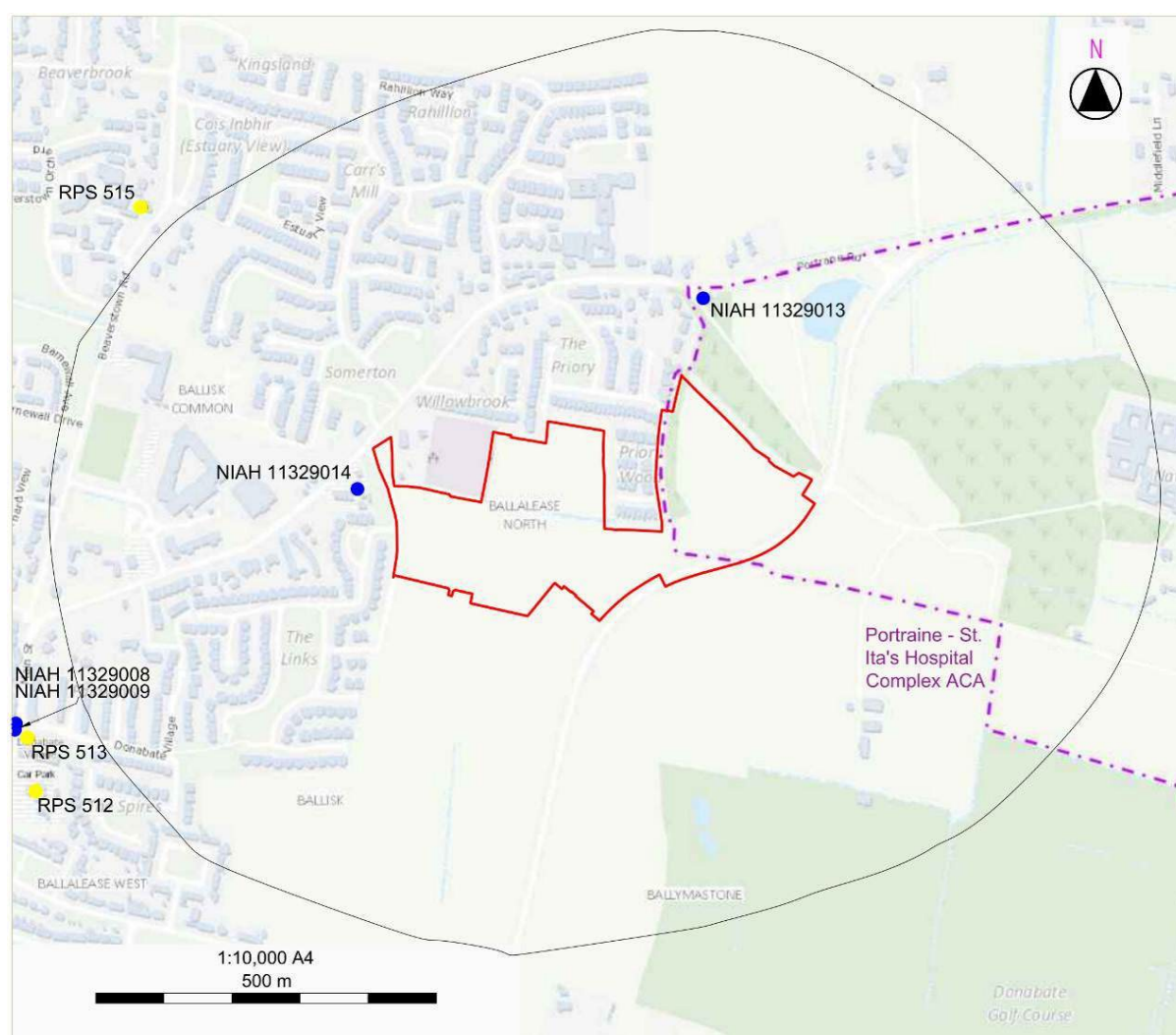


Figure 15.7 Sites of Architectural Interest

15.3.7 Previous Archaeological Excavations

Numerous licensed archaeological excavations have been carried out in the wider landscape (including Donabate village). The results of these excavations are collated below in **Table 15.4**. These include sites excavated within the medieval town of Donabate and prehistoric and medieval sites recorded in advance of development works in the wider landscape.

Table 15.4 Previous Archaeological Excavations

Excavation No.	Townland	Ex. Bulletin Ref.	Results
02E1872	Beaverstown Road, Donabate, Dublin	2004:0499	No archaeology found
02E1708 ext.	Beaverstown, Donabate, Dublin	2004:0500	No archaeology found

Excavation No.	Townland	Ex. Bulletin Ref.	Results
04E0185	Beaverstown, Donabate, Dublin	2004:0501	Excavation of eight archaeological features (pits, a burnt spread, a hearth and a curvilinear feature). Medieval and post-medieval finds.
93E0179	Turvey House, Turvey, Dublin	1993:103	Monitoring in advance of development, revealing three phases of castle/tower house construction.
06E0027 ext.	Ballalease North / Ballymastone / Portraine Ballisk, Dublin	2007:426	Test excavation undertaken in advance of Donabate LAP including portions within the current site. Four 'archaeological areas' were identified: a burnt mound; a ditch (possibly forming a circular enclosure as much as 50m in diameter; 1m wide); a circular ditch enclosure (28m diameter, 0.3–0.9m-wide ditch); a circular ditch enclosure/ring-ditch (12m diameter, 0.6–1.15m-wide ditch), a possible round house/small ring-ditch (8m diameter, 0.6m-wide ditch) and a burnt spread/fulacht fiadh.
07E0185	Donabate, Dublin	2007:459	Testing in advance of broadband project. No archaeology found.
08E0155	Turvey Avenue, Donabate, Dublin	2008:390	Excavation in advance of road widening. Excavated features included early medieval ditches and corn drying kiln; a late medieval structure, pits and ditches and post medieval structures.
09E0155	Turvey Avenue, Donabate, Dublin	2009:305	Testing in advance of new house. No archaeology found.
11E0333	Beaverstown and Rahillion, Dublin	2011:180	Testing in advance of residential development. No archaeology found.
12E253	Newbridge Avenue, Donabate, Dublin	2012:196	Testing in advance of residential development. No archaeology found.
14E0419	Beaverstown, Dublin	2014:493	Testing in advance of residential development. No archaeology found.
16E0188	Newbridge Demesne, Donabate, Dublin	2016:447	Monitoring of services trenches. No archaeology found.
17E0239	St. Patrick's, Donabate, Dublin	2017:500	Testing in advance of development revealed multi-phased archaeological activity in the form of ditches, pits, a metallised surface, two spreads and a human skeleton.
17E0095	Beaverstown Road, Donabate, Dublin	2017:608	Testing in advance of residential development. No archaeology found.

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Excavation No.	Townland	Ex. Bulletin Ref.	Results
17E0094	Donabate Distributor Road, Dublin	2017:619	Testing in advance of road development. One ringditch and two fulachtaí fia were recorded.
17E0309	Corballis, Donabate, Dublin	2017:642	Testing in advance of residential development. No archaeology found.
17E0608	Corballis, Donabate, Dublin	2017:646	Testing in advance of residential development. Two fulachtaí fia were recorded.
17E0630	Corballis, Donabate, Dublin	2017:649	Testing in advance of residential development. Two fulachtaí fia and two sites with dispersed pits were recorded.
18E0208	Corballis, Dublin	2018:595	Testing in advance of residential development. One fulacht fia were recorded.
17E0407	Corballis 1, Dublin	2017:662	Excavation of Iron Age ringditch in advance of development.
E1058	Corballis, Co. Dublin, Dublin	n/a	Rescue excavation of human remains by the NMI.
14E0419	Beaverstown, Dublin	2017:718	Monitoring of development groundworks. No archaeology found.
19E0469	Balcarrick, Donabate, Dublin	2019:437	Testing in advance of development. No archaeology found.
18E0414	Donabate, Dublin	2018:732	Excavation of <i>fulacht fia</i> in advance of development.
19E0351	New Road, Ballisk, Donabate, Dublin	2019:516	Testing in advance of development. One pit recorded.
19E0761	Ballalease South and Corballis, Donabate East, Dublin	2020:101	Testing in advance of development. Eight archaeological areas identified; a burnt mound, a rectangular enclosure and various pits and linear features.
19E0618	Beaverstown, Donabate, Dublin	2019:648	Testing in advance of residential development. No archaeology found.
14E0419 ext.	Beaverstown, Donabate, Co. Dunlin, Dublin	2019:687	Monitoring and excavation in advance of development. A burial ground, keyhole-shaped kiln and a number of linear features were fully excavated and recorded.
14E0419	Turvey Avenue, Beaverstown, Donabate, Dublin	2018:881	Monitoring of development groundworks. No archaeology found.
99E0690	Turvey Avenue, Donabate, Dublin	1999:176	Testing in advance of road widening. Multi phased archaeological complex found and subsequently excavated under licence 08E0155.

Excavation No.	Townland	Ex. Bulletin Ref.	Results
02E1708	Beaverstown, Donabate, Dublin	2002:0508	Testing in advance of development. Several prehistoric features were uncovered comprising of pits and postholes associated with ceramic finds.
02E1708 ext.	Beaverstown, Donabate, Dublin	2003:483	Monitoring of development groundworks. Two areas of archaeological interest noted.
03E1634	Beaverstown, Donabate, Dublin	2003:484	Excavation in advance of development. Neolithic, Bronze Age and post-medieval features excavated and recorded.
21E0840	Ballymastone	2022:378	Ploughed out <i>fulacht fia</i>

The results of excavations in the wider landscape as outlined above indicate that the general area is of high archaeological potential. They include the results of previous archaeological assessment work was carried out to inform the Local Area Plan for Donabate village in 2006. This included a program of geophysical survey and follow up test trenching in the townlands of Ballymastone and Corballis. The initial testing (Baker 2006; Licence 06E0027) focused on the original proposed route of the Donabate Distributor Road, following a programme of geophysical survey (Leigh 2006; Licence 05R0124). A second phase of geophysical survey (Harrison 2007; Licence 07R0177) was followed by additional test excavation (Frazer 2007; Licence 06E0027ext) in 2007. The results of these combined assessments indicated significant archaeological remains within the subject site.

Detailed gradiometer scanning undertaken for the Donabate Local Area Plan (Leigh 2006; 05R0124; Field 8 Area 5) identified a series of short linear responses, forming part of a curvilinear pattern, at ITM 723697, 750358. Subsequent test excavations confirmed the presence buried archaeological features tentatively interpreted as a 50m wide circular enclosure with a central pit (Frazer 2007, 9).

Additional archaeological sites were identified within the wider landholding and outside the current subject site. These are:

- DU012-084; ringditch; ITM 723679, 749981
- DU012-085; 12m wide ringditch; ITM 723695, 749978
- DU012-086; 30m wide circular enclosure; ITM 723504, 749918.

15.3.8 Test Excavation

Archaeological test excavation was undertaken within the subject site between the 20 July to the 11 August 2021 by Aidan O'Connell of Archer Heritage Planning Ltd under licence (21E0453; Appendix 15.1) from the Department of Housing, Local Government and Heritage (DHLGH) in consultation with the National Museum of Ireland (NMI). A total of 90 test trenches were excavated across the full Ballymastone Masterplan area. In total, 10191 linear meters/18344 sq. m of test trenches were excavated. An additional 284 sq. m was opened around various archaeological features in order to better define their nature and extent (**Figure 15.8**).

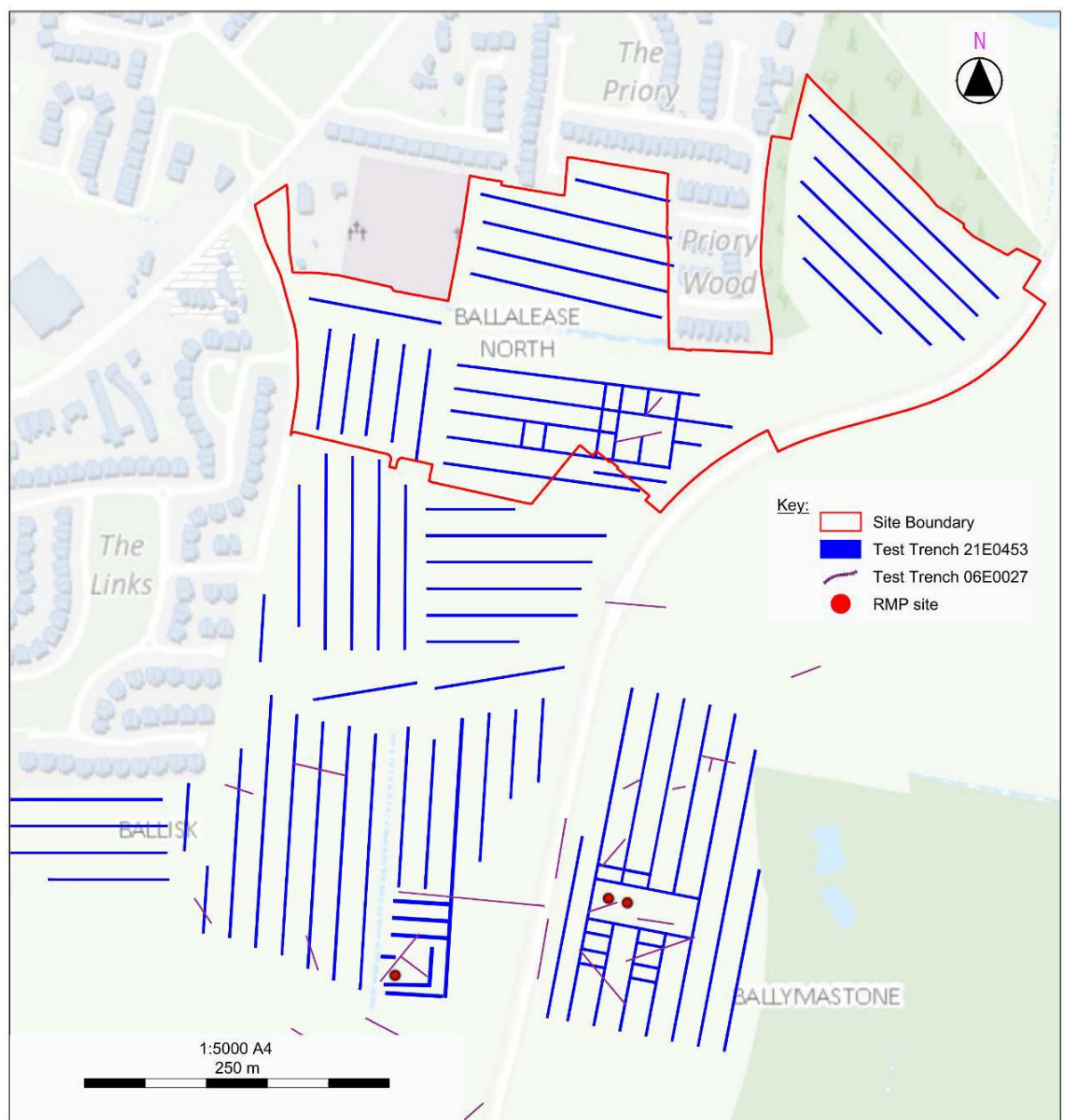


Figure 15.8 Previous archaeological Investigations within the subject site

A total of nine archaeological areas were identified within the overall Ballymastone Masterplan area. Three of these were identified from desktop sources/previous archaeological investigations and six from the current test trenching programme. These are as follows:

- Archaeological Area 1; ITM 723504, 749918. Circular Enclosure (30m diameter; RMP DU012-088).
- Archaeological Area 2; ITM 723582, 750191. Pit with burnt mound material.
- Archaeological Area 3; ITM 723471, 750317. Levelled *fulacht fia*.
- Archaeological Area 4; ITM 723445, 750216. Pit with burnt mound material.
- Archaeological Area 5; ITM 723705, 750531. Levelled *fulacht fia*.
- Archaeological Area 6; ITM 723703, 750360. Possible enclosure and associated features.
- Archaeological Area 7; ITM 723652, 750325. Levelled *fulacht fia*.
- Archaeological Area 8; ITM 723916, 750557. Levelled *fulacht fia*.

- Archaeological Area 9; ITM 723695, 749978. Two circular huts, 1 Ringditch & 1 burnt spread.

Of these nine archaeological areas, four (AA5, AA6, AA7 & AA8) are located within the current application area (see **Figure 15.9**).

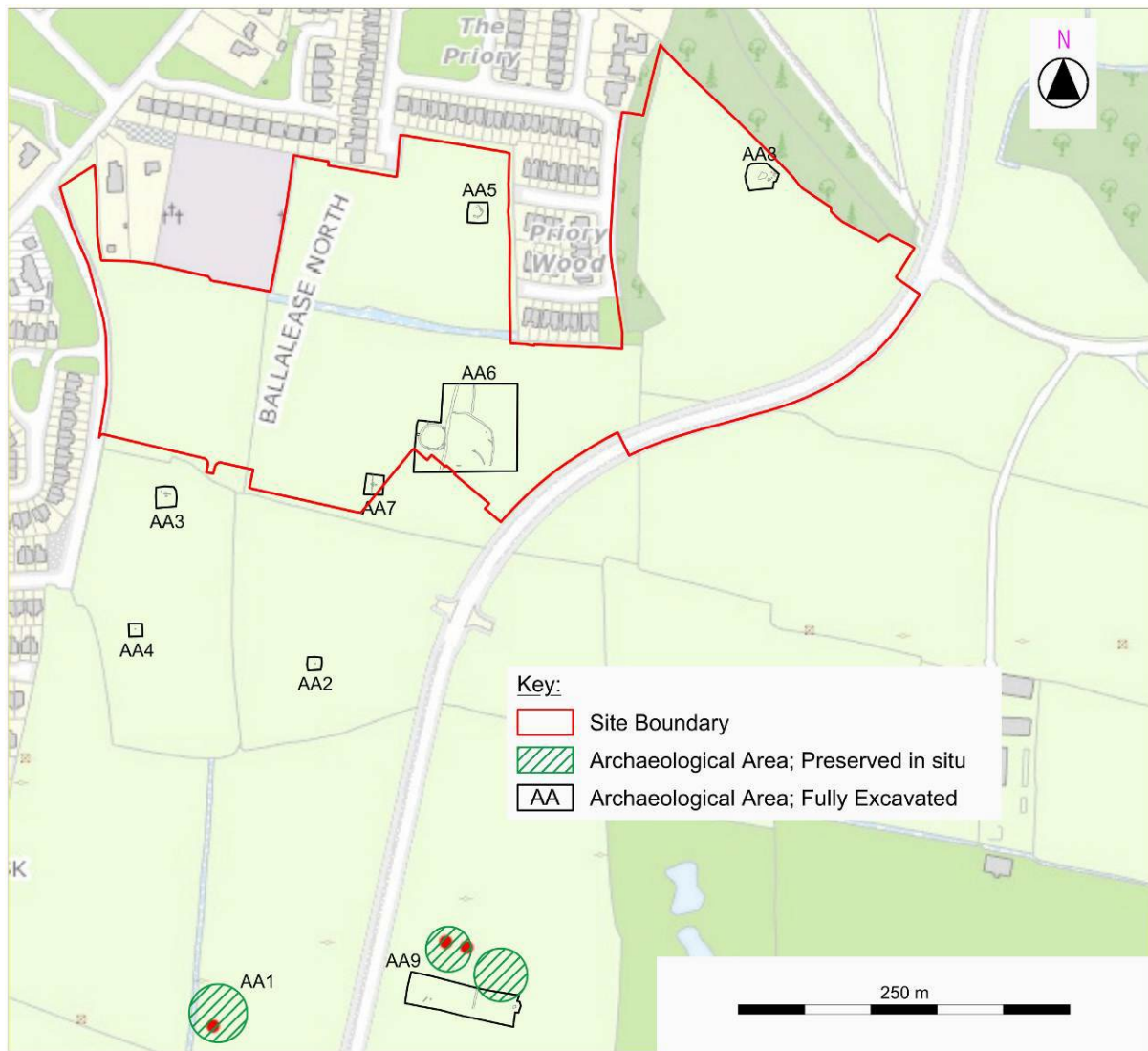


Figure 15.9 Test excavations results

15.3.9 Full Archaeological Excavation

Full archaeological excavation was undertaken across eight sites between October and December 2021 (AA2-AA9; see **Figure 15.9**). Excavation results for AA5, AA6, AA7 & AA8 are outlined below.

15.3.9.1 Archaeological Area 5

Full archaeological excavation of Archaeological Area 5 took place on 11th-18th October 2021 under licence 21E0670 (Appendix 15.2). A 15m x 15m cutting was opened by mechanical excavator under archaeological supervision centred on the features first revealed during the test excavations. The features comprised four pits, one connected to a curvilinear channel and a second short linear channel

(Figure 15.10). A fragment of charcoal from one of the larger pits returned a radiocarbon date of AD 1030-1160 (UBA 48272; 942 $\pm$ 25 BP) likely placing activity here in the latter part of the Early Medieval period. Copious amounts of charred seeds were retrieved from the bulk soil samples taken from the larger pits and connected curvilinear channel. This would suggest that the pits and channel may represent the remains of a cereal-drying kiln or kilns. No *in situ* oxidised soil was identified in the cuts and insufficient material was retrieved from bulk soil samples for a meaningful charcoal analysis and it appears more convincing that the charred seeds accumulated as waste material from nearby kilns.



Figure 15.10 Aerial post excavation view of AA5

15.3.9.2 Archaeological Area 6

Full archaeological excavation of AA6 was undertaken from 2nd-30th November 2021 under excavation licence 21E0674 (Appendix 15.3). The principal feature recorded during the excavation was a ring ditch, measuring roughly 20m in diameter and located on the western side of the site (Figure 15.11). The enclosing ditch was V-shaped in profile and measured 0.65-1.30m in width by 0.3-0.7m in depth. A juvenile human burial was interred in the enclosure ditch and radiocarbon dated to AD 650-780 (UBA 48273; 1309 $\pm$ 27 BP) in the Early Medieval period. Orientated in the traditional east/west manner, no significant illness or violent trauma was identified in the skeletal remains. Two smaller concentric curvilinear features; possible slot trenches for a palisade fence, were traced along the interior of the southern and eastern arcs of the ring-ditch. Charcoal from one of these possible slot trenches was dated to 1620-1510 BC (UBA 48274; 3298 $\pm$ 28 BP) in the Middle Bronze Age period. The remaining features from the excavation comprised undated pits and furrows alongside a series of early modern linear and curvilinear field boundaries. Finds included a residual Grooved ware pottery sherd dating from c. 2800-2500 BC.



Figure 15.11 Aerial post-excitation view of AA6

15.3.9.3 Archaeological Area 7

Full archaeological excavation of AA7 was undertaken under excavation licence 21E0675 (Appendix 15.4). A rectangular cutting of roughly 13m x 14m was opened by mechanical excavator and exposed the degraded remains of a burnt mound/*fulacht fia* (Figure 15.12). The surviving remains consisted of two troughs, one shallow pit, one linear feature and a modern drainage ditch. The archaeological features were filled with typical burnt mound material comprising heat-affected stone in a dark charcoal rich/stained soil. A fragment of hazel charcoal from one of the troughs returned a radiocarbon date of 2200-1980 BC (UBA 48275; 3720 ±31 BP) placing activity here in the Early Bronze Age period. This accords well with dates from other sites of this type. No artefacts, animal bones or charred seeds were retrieved during the excavation, while analysis of the bulk soil samples identified a modest range of charcoal; ash, hazel and cherry/blackthorn, that likely represent the use of fuel wood and the make-up of the surrounding woods.



Figure 15.12 Post-excitation view of AA7 from north

15.3.9.4 Archaeological Area 8

Full archaeological excavation of AA8 was undertaken from 18th October-5th November 2021 under excavation licence 21E0676 (Appendix 15.5). A cutting of c. 405 sq. m. contained the degraded remains of a burnt mound (**Figure 15.13**), a type of site that used heated stone to heat/boil water for one or a variety of domestic, industrial or ritual purposes. The site comprised six subsoil-cut pits filled with varying amounts of typical burnt mound material, i.e. heat-affected stone in a dark, charcoal-rich soil matrix. The largest pit was stepped on one side and had a deeper section that breached the water table, deemed likely to have functioned as a well or water source for the burnt mound process. A shallow oval/rectangular shaped pit contained four post-holes in or near each corner suggesting supports for the use of a lining for the pit. While shallow it is likely highly truncated but still deemed to be most likely to have functioned as a trough for the burnt mound process. The other pits were small and irregular and of uncertain function. A fragment of ash (*fraxinus*) charcoal from the basal fill of one of these irregular pits returned a radiocarbon date of 2460-2140 BC (UBA 48276; 3882+/- 39BP) placing activity here in the Chalcolithic (c. 2500-2200 BC) or Early Bronze Age (c. 2200-1700 BC) periods. Two flint flakes and a bipolar flint core were retrieved during the clean-back of the site. An extremely limited number of charcoal fragments were retrieved from the bulk soil samples with ash dominating, followed by cherry/blackthorn. The dominance of ash was seen in a similarly dated burnt mound in neighbouring Corballis townland. No animal bone or further artefacts were retrieved that might provide supporting evidence for what activities may have taken place in the site.



Figure 15.13 Aerial pre-excavation view of AA8

15.3.10 Summary of Baseline Environment Survey

This Cultural Heritage and Archaeology study has employed a variety of sources in conjunction with non-intrusive surveys, archaeological test excavation and full archaeological excavation to make a coherent assessment of the cultural heritage risk associated with the Proposed Development. The following conclusions are presented to ascertain any likely significant potential direct and indirect impacts which the Proposed Development may have:

- The site is large in scale, occupying an area of c. 11.28 ha.
- There are no recorded monuments located within the subject site.
- There are three recorded monuments located within 500m of the subject site (DU012-084, DU012-085 & DU012-088). These indicate that the general area is of high archaeological potential.
- No potential archaeological features were recorded in cartographic sources relating to the subject site.
- No potential archaeological features were recorded in aerial photos of the subject site.
- No archaeological objects are listed within the Topographical files of the NMI within the subject site. Numerous objects are listed in the surrounding area.
- There are no protected structures located within the subject site.
- The subject site is partially located within the Portraine St. Ita's Hospital Complex ACA.
- Previous archaeological excavations associated with the Donabate LAP recorded archaeological features within the site (AA6).
- Test trenching undertaken across the full landholding comprised 90 test trenches with a combined length of 10,191 linear metres with an additional 284 sq. m excavated around archaeological features.
- Nine archaeological areas were identified across the landholding (AA1-AA9), including four (AA5, AA6, AA7 & AA8) within the current application area.
- The four archaeological areas located within the subject site have all been fully archaeologically excavated (preserved by record) under licence (Licence Refs: 21E0670, 21E0674, 21E0675 & 21E0676) to the DHLGH.

The subject site is large in scale and located in proximity to the medieval town of Donabate and numerous recorded monuments. A total of nine archaeological areas have been identified across the landholding from analysis of desk-based sources and licensed archaeological test excavations carried out in advance of the Proposed Development. Consequently, there remains high potential for the continued survival of buried archaeological remains at this large site.

15.4 Predicted Impacts of the Proposed Development

15.4.1 Do-Nothing Impact

If the Proposed Development were not undertaken, any additional unrecorded buried archaeological features within the subject site would be preserved beneath the existing ground surface. However, the site is zoned for development and it is likely that in the absence of this subject proposal, that a development of a similar nature would be progressed on the site that accords with national and regional policies to promote the provision of high quality new residential environments with good layout and design, with adequate public transport and cycle links and within walking distance of community

facilities. The impact on the archaeological environment would likely be similar to this Proposed Development.

15.4.2 Construction Phase

The characterisation of potential impacts is based on the EPA *Guidelines on the Information to be contained in Environmental Impact Assessment Reports* (EPA, 2022) (refer to **Table 1.5** in Chapter 1 (Introduction)).

Buried archaeological sites have been identified at Archaeological Area 5, Archaeological Area 6, Archaeological Area 7 and Archaeological Area 8. Should development proceed, there are significant direct or indirect impacts on these sites during the construction phase of the Proposed Development. The greatest threat to these buried archaeological sites would occur during large-scale removal of topsoil during the initial construction phase groundworks and associated construction traffic. It is concluded that, in the absence of the mitigation measures described below, **significant impacts** on the known buried archaeological remains at the site would be **direct, negative and permanent**.

The Proposed Development will involve considerable ground disturbance works across the remainder of the subject site including excavations and other groundworks (e.g. provision of access roads and service trenches), movement of machines and storage of material in sensitive areas. A Construction Environmental Management Plan (CEMP) has been prepared in respect of the Proposed Development by DBFL Consulting Engineers (submitted under separate cover as part of the planning application), which outlines methodologies for Proposed Development works, including stripping of topsoil and excavation of subsoil layers. Should additional buried archaeological sites or features remain at the site, open area topsoil stripping has the greatest potential to expose these putative remains, which will be visible in the upper subsoil surface. The CEMP sets out the following measures to be implemented:

- Stripping of topsoil shall be carried out in a controlled and carefully managed way and coordinated with the proposed staging for the development.
- At any given time, the extent of topsoil strip (and consequent exposure of subsoil) shall be limited to the immediate vicinity of active work areas.
- Topsoil stockpiles shall be protected for the duration of the works and not located in areas where sediment laden runoff may enter existing surface water drains.
- Topsoil stockpiles shall also be located so as not to necessitate double handling.

Should development proceed, there are **significant potential direct or indirect negative impacts** on additional buried archaeological sites during the construction phase of the Proposed Development. The greatest threat to buried archaeological deposits occurs during large-scale removal of topsoil during the initial construction phase groundworks. It is concluded that, in the absence of the mitigation measures described below, **significant impacts** on the potential buried archaeological remains at the site would be **direct, negative and permanent**.

It is further noted that the northern section of the Proposed Development partially lies within the Portrairie ACA. **However, there are no direct negative effects anticipated to the architectural heritage owing to sufficient separation distances between the Proposed Development area and the Protected Structures within the ACA.**

15.4.3 Operational Phase

No potential negative effects are identified to archaeological heritage at the operational phase. It is anticipated that issues of archaeological interest will have been resolved prior to or during the construction phase.

No direct negative effects are identified to architectural heritage at the operational phase. However, it has been noted that the northern section of the Proposed Development partially lies within Portraine ACA. Relevant policies and objectives of the Fingal Development Plan 2023–2029 seek to protect and enhance the character and distinctiveness of ACAs in the county (HCAP14 & HCAP15) and to ensure that nearby developments are appropriate in terms of the proposed scale, mass, height, density, architectural treatment, layout, materials etc (HCAO24). These policies and objectives are reinforced through the implementation of Development Management Standards DMSO186 & DMSO187. The proposed layout and landscaping design as outlined above in Chapter 5 seeks to ‘create an individual sense of character within the development, having regard to the architectural sensitivities of the St. Ita’s ACA’. The scale and massing of the development at the northeast corner is deliberately limited to residential units of 2–3 storeys high with additional screening vegetation along the Donabate Distributor Road, reinforcing the existing screening by dense tree belts located within the demesne lands. The Landscape and Visual Assessment (see above Chapter 14) identified no adverse interactions between the Proposed Development and the ACA.

The core area of the St. Ita’s Hospital complex ACA is located c. 1.2 km due east from the subject site and on the opposite side of the Donabate Distributor Road. Consequently, there is sufficient separation between the Proposed Development and the ACA to ensure that there will be no negative effects on the character or setting of the St. Ita’s Hospital complex. Furthermore, there is a dense belt of tree planting between the Protected Structures and the Proposed Development area. This will ensure that the Proposed Development will not have a negative visual impact on the ACA. While the construction of the DDR has previously disturbed the western portion of the ACA area, it is concluded that the core area of the ACA, where the Protected Structures are located, remains intact and is at sufficient distance from the Proposed Development. The dense tree belt further provides sufficient screening between the Proposed Development and the core area of the historic demesne. As a result, the development proposal will not materially affect the character and setting of the existing St. Ita’s Hospital complex.

It is concluded that the potential impact of Proposed Development to the character and setting of the ACA is therefore adjudged as **neutral**.

15.5 Mitigation Measures

Mitigation measures shall be undertaken as directed by the DHLGH in compliance with national policy guidelines and statutory provisions for the protection of archaeology and cultural heritage.

15.5.1 Mitigation by Design

Advance archaeological assessments were commissioned at the site at design stage in order to identify adverse effects on archaeological and cultural heritage sites / features at an early stage and to inform the design process. With regards to architectural heritage, the scale and massing of the Proposed Development was carefully considered ensuring that it would not materially affect the character and setting of the St. Ita’s Hospital Complex ACA.

15.5.2 Construction Phase

15.5.2.1 Archaeological Area 5 (AA5)

No site specific construction phase mitigation measures are proposed for Archaeological Area 5 which has been fully archaeologically excavated under licence to the DHLGH.

15.5.2.2 Archaeological Area 6 (AA6)

No site specific construction phase mitigation measures are proposed for Archaeological Area 6 which has been fully archaeologically excavated under licence to the DHLGH.

15.5.2.3 Archaeological Area 7 (AA7)

No site specific construction phase mitigation measures are proposed for Archaeological Area 7 which has been fully archaeologically excavated under licence to the DHLGH.

15.5.2.4 Archaeological Area 8 (AA8)

No site specific construction phase mitigation measures are proposed for Archaeological Area 8 which has been fully archaeologically excavated under licence to the DHLGH.

15.5.2.5 General Mitigation

The following general mitigation measures are proposed:

- All ground disturbance works across the remainder of the development site will be monitored by a suitably qualified archaeologist. In the event that archaeological material is recorded during monitoring, further discussion/consultation with the DHLGH will be sought in order to ascertain the appropriate treatment (i.e. preservation by record/preservation *in situ*) of any additional archaeological remains.
- Should the DHLGH recommend preservation by record/full archaeological excavation, this work will be undertaken under the appropriate licence. The DHLGH may recommend preservation *in situ*, should avoidance of any newly discovered archaeological remains be possible.

15.5.3 Operational Phase

No operational phase mitigation is anticipated. Issues of archaeological and cultural heritage interest will have been resolved prior to or during the construction phase.

15.6 Residual Impacts

The residual effects are the final predicted or intended effects which occur after the proposed mitigation measures have been implemented. It is not anticipated that there will be **any potential negative residual impacts** with the appropriate mitigation measures in place during the construction and operational phases.

15.7 Indirect and /or Secondary Impacts

The indirect/secondary effects are the *impacts on the environment which are not a direct result of the project, often produced away from (the site) or as a result of a complex pathway*. It is not anticipated

that there will be any *potential negative indirect impacts* with the appropriate mitigation measures in place during the construction and operational phases.

15.8 Monitoring

Construction groundworks will be monitored by a suitably qualified archaeologist as per the above-listed mitigation. Any future licensed archaeological works will require an application process including approval of proposed methodologies by the National Monuments Service of DHLGH in consultation with the NMI and notification of works.

15.9 Interactions

Should archaeological material be recorded in the course of monitoring, this may necessitate areas being left open to the elements for a period in order to facilitate consultation with DHLGH, processing of licences and/or full excavation/preservation-by-record of archaeological features. Consequently, in this scenario, there could be **slight, short-term and negative effects** on land and soils (Chapter 9 – Land, Soils, Geology & Hydrogeology). These would be confined in extent to the putative new archaeological area.

15.10 Cumulative Impacts

It is noted, following examination of the excavations bulletin and relevant planning files, that considerable archaeological activity has been recorded in the surrounding area arising from pre-development archaeological investigations.

Pre-development test excavations carried out for the current application extended across the full Masterplan area. Nine archaeological areas were identified:

- Archaeological Area 1; ITM 723504, 749918. Circular Enclosure (30m diameter; RMP DU012-088).
- Archaeological Area 2; ITM 723582, 750191. Pit with burnt mound material.
- Archaeological Area 3; ITM 723471, 750317. Levelled *fulacht fia*.
- Archaeological Area 4; ITM 723445, 750216. Pit with burnt mound material.
- Archaeological Area 5; ITM 723705, 750531. Levelled *fulacht fia*.
- Archaeological Area 6; ITM 723703, 750360. Possible enclosure and associated features.
- Archaeological Area 7; ITM 723652, 750325. Levelled *fulacht fia*.
- Archaeological Area 8; ITM 723916, 750557. Levelled *fulacht fia*.
- Archaeological Area 9; ITM 723695, 749978. Two circular huts, 1 Ringditch & 1 burnt spread.

Of these nine archaeological areas, four (AA5, AA6, AA7 & AA8) are located within the current application area (see **Figure 15.9**).

Proposed and permitted development within the study area, as listed in Chapter 22 Cumulative Impacts, have been considered as part of the assessment of potential cumulative impacts. These have been cross checked against the online database of summary results from licensed archaeological excavations (www.excavations.ie). Sites/features of archaeological significance recorded at the relevant proposed and permitted developments are outlined below. These areas of significant archaeology as identified through assessment at neighbouring development sites are indicative of a

potential ‘collectively significant’ impact on the baseline environment as outlined in Section 3 of the EPA Guidelines (EPA 2022, 54).

Archaeological sites have been recorded at the approved Corballis East LRD (LRD0017/S3). These are as follows:

- Corballis 6. Large earthwork enclosure of probable early medieval date (preserved-in-situ)
- Corballis 8 Fulacht fia (excavated in full under license number 18E0106)
- Corballis 9 Fulacht fia (excavated in full under license number 18E0107)
- Corballis 7 RMP site DU012-019, earthwork (preserved-in-situ)
- Corballis 10 Dispersed pits (excavated in full under license number 18E0108)
- Corballis 11 Fulacht fia (excavated in full under license number 18E0110)
- Corballis 12 Fulacht fia (excavated in full under license number 18E0111)
- Corballis 13 Dispersed pits/settlement activity (excavated in full under license number 18E0112)
- Corballis 14 Fulacht Fia (preserved-in-situ)

Archaeological sites have been recorded at Corballis East, Donabate under Excavation licence 19E0761. The assessment area was spread across the location of two separate Planning Application Areas; Permitted Development F22A/0527 & Proposed Development F24A/0169. The recorded archaeological sites are as follows:

- | | |
|-------------------------|---|
| ■ Archaeological Area 1 | Rectangular enclosure and associated features |
| ■ Archaeological Area 2 | Pit associated with burnt mound activity |
| ■ Archaeological Area 3 | Pits and floor surface with associated post-holes |
| ■ Archaeological Area 4 | Pit and slot trench |
| ■ Archaeological Area 5 | Pit |
| ■ Archaeological Area 6 | Ditch |
| ■ Archaeological Area 7 | Pits |
| ■ Archaeological Area 8 | Burnt Mound (DU012-087) |

Further Archaeological sites were recorded and excavated in advance of the DDR:

- Corballis 1 Ring ditch excavated/preserved by record under excavation licence 17E0407
- Corballis 2 Burnt mound excavated/preserved by record under excavation licence 17E0408
- Corballis 3 Burnt Mound excavated/preserved by record under excavation licence 17E0409

One isolated pit was recorded in Test Excavation 19E0351 in advance of Permitted Development F17A/0373.

Should additional archaeological sites/features be recorded within the subject site at construction phase, there may be cumulative effects, owing to the previous discovery of archaeological sites within the subject site, the wider landholding and in the surrounding area. However, the proposed mitigation outlined in this Chapter and mitigation measures carried out at separate sites will ensure that cumulative effects will *not be significant*.

No cumulative effects are identified in relation to the St. Ita’s Hospital Complex ACA.

15.11 Difficulties Encountered

No major difficulties were encountered during the study.

15.12 Conclusion

An archaeological, architectural and cultural heritage study was undertaken at the subject site in order to identify and record the location, nature and dimensions of any archaeological or cultural heritage features, fabric or artefacts that may be impacted by the proposed works. This assessment included a desk-based study and collated data from the Record of Monuments and Places (RMP), the Topographical files of the National Museum of Ireland (NMI), cartographic sources, aerial photography, documentary research and relevant on-line databases. In addition to the desktop assessment, test excavation assisted in providing an understanding of the receiving archaeological and cultural heritage environment and potential. Nine archaeological areas were identified across the wider landholding (AA1-AA9), including four (AA5, AA6, AA7 & AA8) within the current application Phase 3 area. The four archaeological areas located within the subject site have all been fully archaeologically excavated (preserved by record) under licence (Licence Refs: 21E0670, 21E0674, 21E0675 & 21E0676) to the DHLGH. Consequently, there remains high potential for the continued survival of buried archaeological remains at the site.

Should development proceed, there are **significant potential direct or indirect negative impacts** on additional buried archaeological sites during the construction phase of the Proposed Development. It is proposed that these are mitigated by archaeological monitoring of development groundworks.

It is further noted that the northern section of the Proposed Development partially lies within the Portrairie ACA. However, the Proposed Development is of sufficient distance from the core concentration of Protected Structures within the St. Ita's Hospital complex (c. 1.2 km) to render potential impacts from the Proposed Development as **neutral**.

15.13 References

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- TII 2024 Guidelines for Cultural Heritage Impact Assessment of TII National Road and Greenway Projects. TII Publication PE-ARC-02009.

Chapter 16: Microclimate – Daylight & Sunlight

A fully updated chapter has been included in this Addendum.

16.1 Introduction

This chapter describes the impact assessment undertaken in relation to daylight & sunlight for the Proposed Development. The Proposed Development is described in Section 1.2 of this EIAR Addendum.

IN2 Engineering Design Partnership (IN2) has been commissioned by the Applicant to carry out an analysis of the impact of the Proposed Development on lands at Ballymastone Phase 3, Donabate on daylight & sunlight access for the Proposed Development, as well as the surrounding areas. For a more detailed account of the daylight & sunlight analysis, refer to IN2's report, 'Ballymastone Phase 3 – Daylight and Sunlight Analysis Report (IN2, 2026)', submitted under separate cover as part of the planning application. This analysis was undertaken in accordance with industry best practice guidelines for daylight & sunlight in the Building Research Establishment's (BRE) Site Layout Planning for Daylight and Sunlight: A guide to good practice (BRE 209) 3rd edition/ 2022 edition, (the "BRE Guide").

A scoping exercise was conducted to identify the neighbouring dwellings which would require a detailed study of impact on daylight & sunlight availability. In terms of daylight & sunlight, appropriate separation distances are achieved between the Site and the neighbouring buildings to the North (Priory Wood, The Priory – except 61, Priory Wood – except 64-65 and 80-87, Willowbrook), West (The Links), and South (Ballymastone Phase 2 – except for BZ16, BA06), therefore, no significant adverse impacts are expected in relation to daylight & sunlight. Neighbouring buildings to the North (61 The Priory, 64-65 and 80-87 Priory Wood) and the South (Ballymastone Phase 2 BZ16, BA06) of the development will be assessed for impacts on daylight & sunlight using the decision chart in the BRE Guide.

This Chapter and assessment have been completed in compliance with the Planning and Development Act 2000 (as amended) which transposes into Irish law the requirements of the EU EIA Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment and having regard to the guidance outlined in the Environmental Protection Agency's (EPA) Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR) 2022 (the "EPA's EIAR") as outlined under Chapter 1: Introduction of this EIAR.

This chapter has been prepared by William O'Donnell and Sol Lee. William O'Donnell is a Chartered Engineer (CEng) and member of Engineers Ireland. He has over 20 years' experience of low energy design and building simulation and is responsible for overseeing daylight & sunlight analysis on all projects. Sol Lee is a Built Environment Engineer and a member of Engineers Ireland. With a bachelor's degree in mechanical and sustainability engineering, she now specialises in daylight & sunlight analysis. In her role at IN2 Engineering, Sol is tasked with conducting thorough daylight & sunlight analyses.

16.2 Method

16.2.1 Relevant Standards & Guidelines

The following relevant standards and guidance documents have been consulted when compiling the information in this chapter:

- Planning Design Standards for Apartments: Guidelines for Planning Authorities, 2025 (the “2025 Apartment Guidelines”). These are guidelines issued under section 28 of the 2000 Planning and Development Act (as amended)
- The Building Research Establishment’s (BRE) Site Layout Planning for Daylight and Sunlight: A guide to good practice (BRE 209) 3rd edition/ 2022 edition, (the “BRE Guide”)
- British Standard BS EN 17037:2018 – Daylight in Buildings (+A1:2021) (Incorporating corrigendum October 2021) (the “British EN Standard”)
- Irish Standard IS EN 17037:2018 &AC:2021 (the “Irish EN Standard”)
- Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities, Section 5.3.7 (the “SRDCSG”)
- Urban Development and Building Height Guidelines, 2018 (the “UDBHG”)

16.2.1.1 2025 Apartment Guidelines

Section 3.1 of the 2025 Apartment Guidelines state that:

“Building heights are the subject of separate guidance to planning authorities contained within the Urban Development and Building Heights Guidelines, issued in December 2018. The SRDCSGs (2024) also set out minimum separation distances for housing, duplexes and apartments. Separation distances for apartments will also need to be based on achieving satisfactory levels of daylight/sunlight for future occupiers of the apartments and for neighbouring occupiers (see also Section 6.1 below), and where there is a need to accommodate centralised areas of communal open space within a perimeter block.”

Section 6.1 of the 2025 Apartment Guidelines state that:

“The provision of acceptable levels of natural light in new apartment developments is an important planning consideration as it contributes to the liveability and amenity enjoyed by apartment residents. It is also important to safeguard against a detrimental impact on the amenity of other sensitive occupiers of adjacent properties. Section 5.3.7 of the SRDCSGs outlines requirements for the provision of acceptable levels of daylight in new residential developments and adjoining properties.

Planning authorities are requested to practically and flexibly apply the general requirements of these Guidelines in relation to refurbishment schemes, particularly in historic buildings, some urban townscapes and ‘over the shop’ type or other existing building conversion or refurbishment projects, where property owners must work with existing building fabric and dimensions. Ultimately, Building Regulations must be complied with and planning authorities must prioritise the objective of more effective usage of existing underutilised accommodation, including empty buildings and vacant upper floors.”

16.2.1.2 BRE Guide

The 2022 BRE Guide (and associated EN Standard) introduces two new calculation methodologies, Spatial Daylight Autonomy (SDA) and Median Daylight Factor (MDF), either of which can be applied to demonstrate daylighting compliance. SDA is an accurate and sophisticated methodology utilising advanced computer simulation techniques which accounts for real climatic data for the particular site location, whilst also accounting for window orientation and ensuring daylight uniformity within a space.

SDA is therefore a Climate Based Daylight Methodology (CBDM) accounting for recorded annual illumination (light) levels at a particular site. Conversely, MDF is a simplified calculation technique, which utilises a theoretical sky model that does not account for façade orientation or variances of climatic conditions. Therefore, in order to ensure the highest accuracy of daylighting analysis, the SDA/CBDM methodology has been utilised. The BRE Guide describes its purpose as follows:

“This guide gives advice on site layout planning to achieve good sunlighting and daylighting, both within buildings and in the open spaces between them. It is intended to be used in conjunction with the interior daylight recommendations for new buildings in the British Standard Daylight in buildings, BS EN 17037. It contains guidance on site layout to provide good natural lighting within a new development; safeguarding of daylight and sunlight within existing buildings nearby; and the protection of daylighting of adjoining land for future development.”

The BRE Guide also notes that:

“1.6 The guide is intended for building designers and their clients, consultants, and planning officials. The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design (see Section 5). In special circumstances the developer or planning authority may wish to use different target values. For example, in a historic city centre, or in an area with modern high-rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings. Alternatively, where natural light is of special importance, less obstruction and hence more sunlight and daylight may be deemed necessary. The calculation methods in Appendices A and B are entirely flexible in this respect. Appendix F gives advice on how to develop a consistent set of target values for skylight under such circumstances.”

“1.7 The guidance here is intended for use in the United Kingdom and in the Republic of Ireland, though recommendations in the Irish Standard IS EN 17037 may vary from those in BS EN 17037. Many of the principles outlined will apply to other temperate climates. More specific guidance for other locations and climate types is given in BRE Report Environmental site layout planning.”

Therefore, if the situation arises where the targets identified within the Guide are not achieved, these should be highlighted and either justified in the context of the development/site, or where relevant and applicable, compensatory measures will be proposed. However, the Guide does not impose absolute standards that must be achieved under all circumstances. In the context of this report, any deviations from the Guide’s recommendations have, therefore, been identified, with an approach throughout to ensure that good quality daylight/sunlight is achieved through analysis and design improvements as far as practicable and viable, as detailed in the report as relevant.

16.2.1.3 British & Irish Versions of the EN Standards

The EN 17037:2018 standard—which is the basis of both the 2018 British EN Standard and the 2018 Irish EN Standard – considers a metric based on median daylight, in order to ensure both extent and a degree of uniformity of daylight.

“A space is considered to provide adequate daylight if a target illuminance level is achieved across a fraction of the reference plane within a space for at least half of the daylight hours.”

The BS EN 17037 standard varies from the IS EN 17037 standard as it contains a national annex developed by the Building Research Establishment (BRE) to specifically address daylight requirements in domestic dwellings. These requirements are further clarified in the BRE Guide, e.g.: the correct delineation of spaces allowing for the removal of corridor spaces attached to a room; the mandatory inclusion of kitchen spaces in combined living spaces; revised rational upper limits for surface reflectances; default framing factors; maintenance factors. None of which are specified in IS EN 17037, instead requiring, for example, daylight assessment on the ambiguously worded “at least on the required area of the space”. Therefore, for domestic applications, the BRE Guide remains the most applicable document to utilise for daylight assessments.

The National Annex

As is noted above, the 2018 British Standard (BS EN 17037:2018) includes a “National Annex”, containing “Further recommendations and data for daylight provision in the UK and Channel Islands”. This is referenced further in the appendix of this report. As there is no equivalent in the 2018 Irish Standard, the 2018 British Standard National Annex will be referenced, which states:

“NA.1 Introduction: The UK committee supports the recommendations for daylight in buildings given in BS EN 17037:2018; however, it is the opinion of the UK committee that the recommendations for daylight provision in a space (see Clause A.2) may not be achievable for some buildings, particularly dwellings. The UK committee believes this could be the case for dwellings with basement rooms or those with significant external obstructions (for example, dwellings situated in a dense urban area or with tall trees outside), or for existing buildings being refurbished or converted into dwellings. This National Annex therefore provides the UK committee’s guidance on minimum daylight provision in all UK dwellings.”

NA.2 addresses minimum daylight provision in UK dwellings. It contains a table, in which target illuminance, ET (lx), levels are recommended for different room types. These are: bedroom at 100 lx; living room at 150 lx; and kitchen at 200 lx, which may be compared to EN 17037 (European standard including both BS EN 17037:2018 and IS EN 17037:2018)’s recommendation of 300 lux (irrespective of room application). The commentary is as follows:

“Even if a predominantly daylit appearance is not achievable for a room in a UK dwelling, the UK committee recommends that the target illuminance values given in Table NA.1 are exceeded over at least 50% of the points on a reference plane 0.85 m above the floor, for at least half of the daylight hours.”

16.2.1.4 SRDCSG

The SRDCSG notes the following in relation to daylight. Note the BRE Guide 2nd edition has been superseded and replaced by the 3rd edition as discussed above.

“The provision of acceptable levels of daylight in new residential developments is an important planning consideration, in the interests of ensuring a high quality living environment for future residents. It is also important to safeguard against a detrimental impact on the amenity of other sensitive occupiers of adjacent properties.

(a) The potential for poor daylight performance in a Proposed Development or for a material impact on neighbouring properties will generally arise in cases where the buildings are close together, where

higher buildings are involved, or where there are other obstructions to daylight. Planning authorities do not need to undertake a detailed technical assessment in relation to daylight performance in all cases. It should be clear from the assessment of architectural drawings (including sections) in the case of low-rise housing with good separation from existing and proposed buildings that undue impact would not arise, and planning authorities may apply a level of discretion in this regard.

(b) In cases where a technical assessment of daylight performance is considered by the planning authority to be necessary regard should be had to quantitative performance approaches to daylight provision outlined in guides like A New European Standard for Daylighting in Buildings IS EN17037:2018, UK National Annex BS EN17037:2019 and the associated BRE Guide 209 2022 Edition (June 2022), or any relevant future standards or guidance specific to the Irish context.

In drawing conclusions in relation to daylight performance, planning authorities must weigh up the overall quality of the design and layout of the scheme and the measures proposed to maximise daylight provision, against the location of the site and the general presumption in favour of increased scales of urban residential development. Poor performance may arise due to design constraints associated with the site or location and there is a need to balance that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.”

16.2.1.5 UDBHG

Section 3.2 of the UDBHG notes the following in relation to daylight and compensatory measures. Note the BRE Guide 2nd edition has been superseded and replaced by the 3rd edition as discussed above.

“At the scale of the site/building:

(a) The form, massing and height of Proposed Developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.

(b) Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment’s ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition) or BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’.

(c) Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.”

16.2.2 Overview of Daylight & Sunlight Analysis

The assessment methodology for the various aspects of the daylight and sunlight analysis is summarised in **Table 16.1**, below.

A three-dimensional digital model of the Proposed Development and existing buildings in the area was constructed by IN2 based on drawings and three-dimensional models supplied by the Design Team, and

with reference to satellite and aerial photography. Trees and boundary planting were not included in this model.

Table 16.1 Overview of daylight and sunlight analysis

	Element	Methodology	Guidelines
Daylight	Proposed development	Spatial Daylight Autonomy (SDA)	BRE Guide (2022)
	Existing neighbouring buildings	Vertical sky component (VSC)	BRE Guide (2022)
Sunlight	Proposed development amenity spaces	Sunlight hours	BRE Guide (2022)
	Proposed development	Exposure to Sunlight (ETS)	BRE Guide (2022)
	Existing neighbouring buildings	Annual probable sunlight hours (APSH)	BRE Guide (2022)
	Existing Neighbouring amenity spaces	Sunlight hours	BRE Guide (2022)

16.2.3 Glossary

- **BRE Guide:** The Building Research Establishment's (BRE) Site Layout Planning for Daylight and Sunlight. A guide to good practice (BRE 209) 3rd edition/ 2022 edition, (the "BRE Guide"). This document is specifically designed to facilitate good building design within the planning context. The BRE Guide clarifies and expands on the methodologies contained in IS EN 17037 and BS EN 17037 with specific relevance to residential buildings, and as such has been deemed to take precedence over these other documents.
- **Working Plane:** The working plane is the notional plane where visual tasks, and on which predicted light levels would normally be undertaken. For a residential assessment, the working plane is defined by BRE Guide at 850 mm above floor level.
- **Amenity Sunlight:** Amenity sunlight is a measure of direct daylight received on an area over the duration of 21st March based on the sun's solar position for a geographical location. As the 21st March is the solar equinox, the sun is at its mid-point of travel position through the year, therefore representing an average condition throughout the year of how well sunlit an amenity space will be. It may be noted that in the Northern Hemisphere, the sun rises due east and sets due west. Amenity sunlight is calculated for compliance with BRE Guide.
- **Vertical Sky Component (VSC):** Vertical Sky Component, also referred to as VSC, is used for the assessment of impact on neighbouring buildings by a Proposed Development with respect to daylight availability. VSC is a measure of the percentage of illuminance that a point can receive from the CIE Overcast Sky as a percentage of that received at unobstructed horizontal locations. In simple terms, how much of the sky that can be seen for a given point. VSC assessments do not included reflected light. VSC is calculated for compliance with BRE Guide.

- **Probable Sunlight Hours (APSH):** Annual probable sunlight hours and winter probable sunlight hours, also referred to as APSH and WPSH, are used for the assessment of impact on neighbouring buildings by a Proposed Development. APSH and WPSH are a measure of probable direct sunlight to a window or surface and therefore are only relevant to windows within 90 degrees of south for buildings in the northern hemisphere. Therefore, any window with a northerly aspect (i.e. orientated between North and East and North and West) is therefore not assessed within the methodology.
- **Climate Based Daylight Modelling - Spatial Daylight Autonomy (SDA):** Climate based daylight modelling, also referred to as CBDM, involves the use of a detailed daylight calculation methods where hourly (or sub-hourly) internal daylight illuminance values for a typical year are computed using hourly (or sub-hourly) sky and sun conditions derived from climate data appropriate to the site. CBDM assessments are therefore orientation dependent: i.e. a south facing window would be expected to receive more daylight than north facing etc.

This calculation method determines daylight provision directly from simulated illuminance values on the working plane with results determined in lux (a measure of light). CBDM is utilised for compliance with EN 17037 method 2 Spatial Daylight Autonomy (SDA).

- **Sunlight Exposure (ETS):** Sunlight exposure is assessed on a window of at least one habitable room per dwelling (preferably a living room) for the number of hours of direct sunlight exposure on the 21st March.

16.2.4 Daylight

16.2.4.1 Proposed Development – Spatial Daylight Autonomy (SDA)

Spatial Daylight Autonomy (SDA) is a methodology that utilises historic climate data (Dublin IWEA file 039690 was used for this assessment) for predicting internal illumination due to natural light on an hour-by-hour basis, accounting for not only diffuse skylight but also the direct sunlight element. SDA results will differ for façade orientation, with those elevations with southerly aspect (correctly) being deemed to receive more daylight.



Figure 16.1 Example for internal daylight analysis results

Figure 16.1 provides an example of an internal daylight compliance comparison, with green contours illustrating where daylight was predicted to achieve 100 Lux for bedrooms, 150 Lux for living rooms, and 200 Lux for kitchen, living and dining areas (KLDs) and kitchens – the illuminance recommendations for dwellings included in the BRE Guide, based on BS.EN.17037:2018. Compliance for a room is defined in the BRE Guide as at least 50% of the room achieving this target.

The daylight analysis accounts for all aspects that can potentially restrict natural light availability including any adjacent / opposing buildings, balcony structures, window frames / sills, etc. Daylight factors for each space is then calculated for a working plane height of 0.85 m on a 0.25 x 0.25 m grid basis, and a wall offset of 0.3 m (as defined in the BRE Guide) to enable a detailed calculation within each room, the median of which then determined the space compliance. The rooms have been assessed to the minimum areas as prescribed in the 2025 Apartment Guidelines where applicable.

16.2.4.2 Existing Neighbouring Buildings

The impact on daylight to existing buildings is assessed utilising a quantitative assessment method as detailed in the BRE Guide, which states that:

“If any part of a new building or extension, measured in a vertical section perpendicular to a main window wall of an existing building, from the centre of the lowest window, subtends an angle of more than 25° to the horizontal, then the diffuse daylighting of the existing building may be adversely affected. This will be the case if either:

- the VSC (Vertical Sky Component) measured at the centre of an existing main window is less than 27%, and less than 0.8 times its former value.
- the area of the working plane in a room which can receive direct skylight is reduced to less than 0.80 times its former value.”

An analysis was undertaken by calculating daylight and sunlight availability for window locations on the neighbouring buildings which have the potential to be impacted with the Proposed Development.

The analysis assesses main windows including living rooms and conservatories. Windows to intermittently utilised spaces such as corridors or WC's were excluded from the analysis.

16.2.5 Sunlight

16.2.5.1 Proposed Development – Amenity Spaces

The BRE Guide provides guidance with regards to sunlighting and shading to external amenity spaces within Proposed Developments as follows:

“That for it to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least two hours of sunlight on 21st March”.

The methodology assesses sunlight performance at the Equinox, as this is the mid solar position throughout the year (as illustrated in **Figure 16.2**), with compliance indicative of spaces that will receive adequate sunlight and appealing useful spaces, including that the following attributes will be achieved:

- Provide attractive sunlit views (all year);
- Make outdoor activities like sitting out and children's play more pleasant (mainly warmer months);
- Encourage plant growth (mainly spring and summer); and
- Dry out the ground, reducing moss and slime (mainly in colder months).

Analysis was undertaken utilising drawing information as received from McCauley Daye O'Connell Architects. Lighting simulations were then undertaken by IN2 Engineering, utilising Tas software.

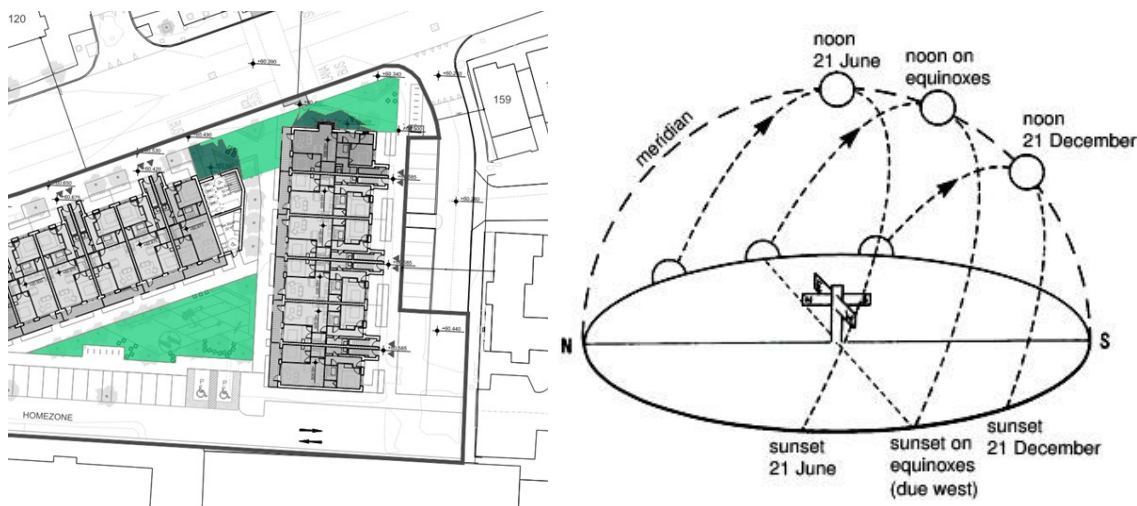


Figure 16.2 Example analysis of amenity spaces

16.2.5.2 Proposed Development – Exposure to Sunlight (ETS)

The BRE Guide outlines that:

“3.1.15 In general a dwelling, or non-domestic building that has a particular requirement for sunlight, will appear reasonably sunlit provided:

- *at least one main window wall faces within 90° of due south and*
- *a habitable room, preferably a main living room, can receive a total of at least 1.5 hours of sunlight on 21 March. This is assessed at the inside centre of the window(s); sunlight received by different windows can be added provided they occur at different times and sunlight hours are not double counted.”*

As with Sunlight Amenity, the BRE Guide methodology therefore utilises the Equinox as being representative of the solar mid-position throughout the year, with the calculation of potential received sunlight during that day enabling a quantitative assessment in addition to idealised configuration of ensuring southerly aspect – preferably for living areas as described below:

“3.1.16 Where groups of dwellings are planned, site layout design should aim to maximise the number of dwellings with a main living room that meets the above recommendations.”

The guide further notes that:

“3.1.10 For interiors, access to sunlight can be quantified. BS EN 17037[1] recommends that a space should receive a minimum of 1.5 hours of direct sunlight on a selected date between 1 February and 21 March with cloudless conditions. It is suggested that 21 March (equinox) be used. The medium level of recommendation is three hours and the high level of recommendation four hours. For dwellings, at least one habitable room, preferably a main living room, should meet at least the minimum criterion.”

The analysis was undertaken for each unit of the Proposed Development to determine the exposure to sunlight that they will receive. It may be noted therefore that the tables and diagrams below indicate compliance for Exposure to Sunlight based on assessment of units as opposed to individual rooms, as is the case for Daylight analysis.

Figure 16.3 shows an example of how the results are illustrated, as presented within the report to indicate their Exposure to Sunlight classification in accordance with the BRE Guide / EN 17037 may be interpreted as follows:

Exposure to Sunlight			
Compliant	High	≥ 4.0 hrs	
	Medium	3.0 - 4.0 hrs	
	Minimum	1.5 - 3.0 hrs	
Non-Compliant	Low	< 1.5 hrs	

Figure 16.3 Exposure to Sunlight Classification



Figure 16.4 Exposure to Sunlight Example Results

In the example above, most of the units were determined to receive Medium to High range of Exposure to Sunlight and identified in green. One unit was determined non-compliant and identified in pink.

16.2.5.3 Existing Neighbouring Buildings, Amenity Spaces (Gardens) & Neighbouring Solar Panels

The impact on sunlight availability to existing buildings can be assessed utilising a quantitative assessment method as detailed in the BRE Guide, which states that:

“If a living room of an existing dwelling has a main window facing within 90° of due south, and any part of a new development subtends an angle of more than 25° to the horizontal measured from the centre of the window in a vertical section perpendicular to the window, then the sunlighting of the existing dwelling may be adversely affected. This will be the case if the centre of the window:

- *receives less than 25% of annual probable sunlight hours and less than 0.80 times its former annual value; or less than 5% of annual probable sunlight hours between 21 September and 21 March and less than 0.80 times its former value during that period;*
- *and also has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours."*

In relation to the assessment of impacts on sunlight availability to existing neighbouring amenity spaces, the BRE Guide states the following:

"It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least two hours of sunlight on 21 March. If as a result of new development an existing garden or amenity area does not meet the above, and the area that can receive two hours of sun on 21 March is less than 0.80 times its former value, then the loss of sunlight is likely to be noticeable. If a detailed calculation cannot be carried out, it is recommended that the centre of the area should receive at least two hours of sunlight on 21 March"

For the impact on neighbouring solar panels, the BRE Guide states the following:

"As initial check, the annual probable sunlight hours received at the centre of each panel should be calculated with and without the Proposed Development in place."

The BRE Guide also outlines if the annual probable sunlight hours are found to be reduced to less than 0.9 times the existing conditions, a further assessment is warranted as stated below:

"Where the annual probable sunlight hours received by a solar panel with the new development in place is less than 0.9 times the value before, a more detailed calculation of the loss of solar radiation should be undertaken".

16.2.6 Scoping

The BRE Guide provides guidance on Site layout and planning to maintain adequate daylight & sunlight access to new and existing dwellings.

The BRE Guide states: -

"2.2.4 Loss of light need not be analysed if the distance of each part of the new development from the existing window is three or more times its height above the centre of the existing window..."

2.2.5 ...Measure the angle to the horizontal subtended by the new development at the level of the centre of the lowest window. If this angle is less than 25° for the whole development then it is unlikely to have a substantial effect on the diffuse skylight enjoyed by the existing building.

2.2.6 Any reduction in the total amount of skylight can be calculated by finding the VSC at the centre of each main window.

2.2.8 Where room layouts are known (for example if they are available on the local authority's planning portal), the impact on the daylighting distribution in the existing buildings should be found by plotting the no sky line in each of the main rooms ..."

Through design development and analysis of the final architectural design, we confirm these criteria have been incorporated into the design of the Proposed Development. Appropriate separation

distances, subtend angles, VSC, APSH or no skyline are achieved as detailed in Section 5.0 of the submitted standalone Ballymastone Phase 3 – Daylight and Sunlight Analysis Report (IN2, 2026).

16.2.7 Context under Technical Guidance Documents

The BRE Guide Decision Chart was followed in order to assess the potential impact on daylight & sunlight availability on the neighbouring dwellings.

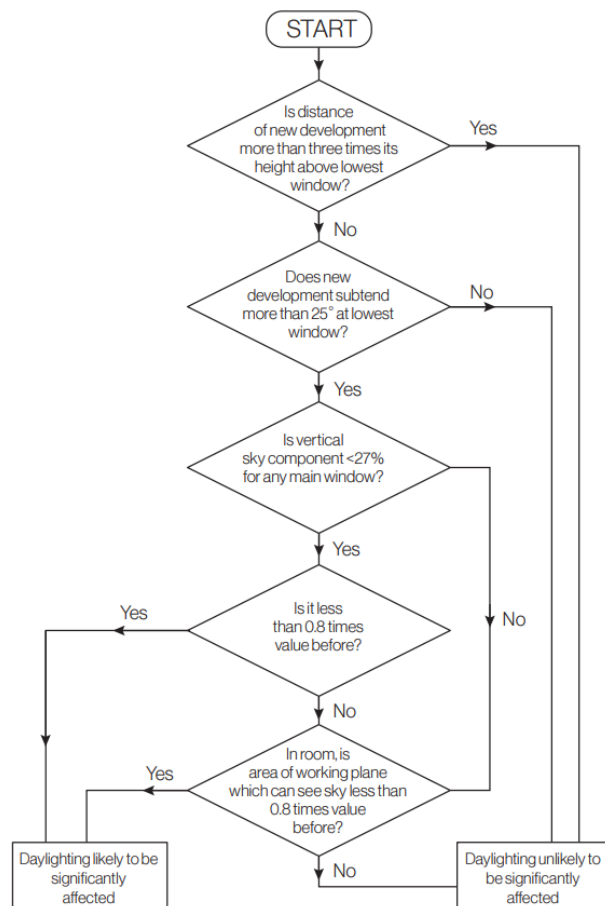


Figure 16.5 BRE Guide Decision Chart

The neighbouring buildings that are adjacent to the North (Priory Wood, The Priory – except 61, Priory Wood – except 64-65 and 80-87, Willowbrook), West (The Links), and South (Ballymastone Phase 2 – except for BZ16, BA06), and the West (The Links) of the Proposed Development are sufficiently distant from it to ensure that their access to daylight & sunlight is unaffected. The dwellings to the North (61 The Priory, 64-65 and 80-87 Priory Wood) and the South (Ballymastone Phase 2 BZ16, BA06) of the Proposed Development are not far enough away from the Site, therefore using the decision chart, they are assessed for subtend angle.

Neighbouring buildings which were determined to have a subtend angle below 25°, as per the methodology in the BRE Guide were therefore exempt from the VSC, APSH and No Sky Line assessment.

Those buildings failing to have a subtend angle below 25° were assessed for VSC, APSH and No Sky Line.

These assessments determined that the Proposed Development will not have an impact on the daylight & sunlight availability of the neighbouring buildings.

16.2.8 Definition of Effects on Daylight & Sunlight Access

The assessment of the impact of the Proposed Development on daylight & sunlight access had regard to the Environmental Protection Agency's (EPA) Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR) 2022 (the "EPA's EIAR"), and to Directive 2011/92/EU (as amended by Directive 2014/52/EU) on the assessment of the likely effects of certain public and private projects on the environment.

The list of definitions given below is taken from Table 3.4: Descriptions of Effects contained in the EPA's EIAR. Some comment is also given below on what these definitions might imply in the case of sunlight access. The definitions from the EPA document are in italics.

- **Imperceptible:** *An effect capable of measurement but without significant consequences. The definition implies that the development would cause a change in the sunlight received at a location, capable of measurement, but not noticeable to the casual observer. If the development caused no change in sunlight access, there could be no effect.*
- **Not Significant:** *An effect which causes noticeable changes in the character of the environment but without significant consequences (the footnote "2" to the word "noticeable" is: "for the purposes of planning consent procedures"). The definition implies that the development would cause a change in the sunlight received at a location, which is capable of measurement and capable of being noticed by an observer who is taking an active interest in the extent to which the proposal might affect sunlight access.*
- **Slight:** *An effect which causes noticeable changes in the character of the environment without affecting its sensitivities. For this definition to apply, the amount of sunlight received at a location would be changed by the construction of the development to an extent that is both capable of measurement and is noticeable to a minor degree. However, the sunlight environment within an existing building should remain largely unchanged.*
- **Moderate:** *An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends. In this case, a development must bring about a change in the sunlight environment within an existing building; and this change must be consistent with a pattern of change that is already occurring, is likely to occur, or is envisaged by policy. A moderate effect would occur where other developments were bringing about changes in sunlight access of similar extent in the area.*
- **Significant:** *An effect which, by its character, magnitude, duration or intensity alters a sensitive aspect of the environment. The definition implies that the existence of the development would change the extent of sunlight access in a manner that is not "consistent with existing and emerging baseline trends". For example, a development resulting in a "significant" diminution of sunlight access would reduce sunlight to the extent that minimum standards for sunlighting are not met and artificial lighting is required for part of the day.*
- **Very Significant:** *An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment. The definition implies that the existence of the*

development would change the extent of sunlight access to a considerable degree and in a manner that is not “consistent with existing and emerging baseline trends”. For example, a “very significant” effect would occur where a development would result in sunlight received in a room falling well below the minimum standards for sunlighting and where artificial lighting would be required in that room as the principal source of lighting all the time.

- **Profound:** *An effect which obliterates sensitive characteristics. Examples of development resulting in a “profound” effect on sunlight access would include facilitating sunlight access to a room in an existing building where the existing room has none (e.g. as a result of the demolition of a building) or by removal of all access to sunlight within an existing building.*

In relation to daylight & sunlight access, it is conceivable that a development could result in positive effects, but this implies that a development would involve a reduction of the size or scale of built form (e.g. such as the demolition of a building, which might result in an increase in sunlight access). Though that is possible, it is usually unlikely as most development involves the construction of new obstructions to daylight & sunlight access.

16.3 Baseline Environment

Ballymastone Phase 3 is a part of the Ballymastone Development, including Phases 1, 2, and 3. Ballymastone Phases 1 and 2 are permitted developments (LRD0008/S3, LRD0039/S3 respectively).

The statistics of Met Éireann, the Irish Meteorological Service (1981-2010), indicate that the sunniest months in Ireland are May and June. During December, Dublin receives a mean daily duration of 1.7 hours of sunlight out of a potential 7.4 hours sunlight each day (i.e. only 22% of potential sunlight hours). This can be compared with a mean daily duration of 6.4 hours of sunlight out of a potential 16.7 hours each day received by Dublin during June (i.e., 38% of potential sunlight hours).

Therefore, impacts caused by overshadowing are generally most noticeable during the summer months and least noticeable during the winter months. Due to the low angle of the sun in midwinter, the shadow environment in all urban and suburban areas is generally dense throughout winter.

In relation to daylight & sunlight aspects, neighbouring buildings, their gardens, and neighbouring solar panels are included as follows:

- 61 The Priory
- 64 & 65 and 80-87 Priory Wood
- BZ16 (Ballymastone Phase 2)
- BA06 (Ballymastone Phase 2)

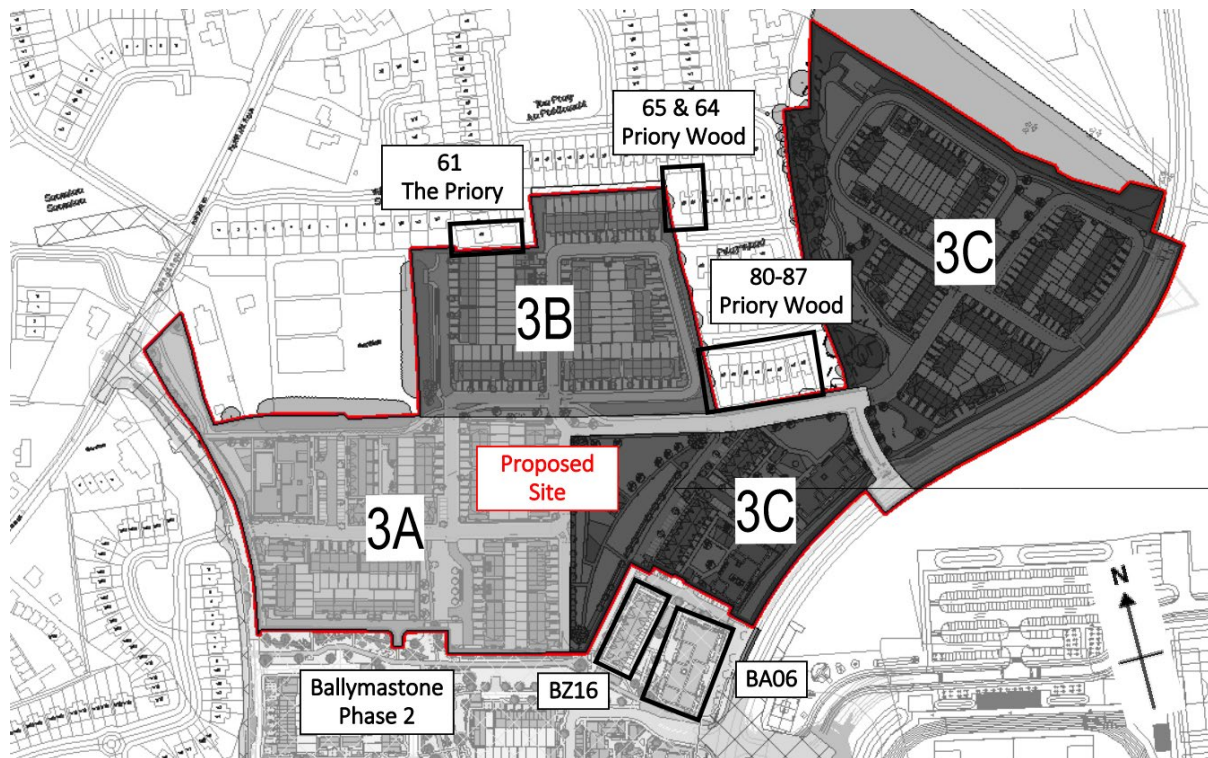


Figure 16.6 Site plan with adjacent neighbouring dwellings identified

The Site is that illustrated on '23010-MDO-ZZZZ-XX-DR-A01-053303-Development Phasing - Phase 3', prepared by MDO, which has been updated to reflect the proposed RFI response.

16.4 Predicted Impacts of the Proposed Development

Analysis determined that there would not be significant impact on the Proposed Development.

16.4.1 Do-Nothing Impact

In a "do nothing" scenario, the existing daylight & sunlight environment within neighbouring buildings will remain unchanged.

16.4.2 Construction Phase

The potential impact of the construction phase of the Proposed Development on daylight & sunlight access is likely to be, initially, lesser than the potential impact of the completed development. As the Proposed Development nears completion, the potential impact of the emerging development is likely to be similar in all material respects to that of the completed development.

It is noted that temporary structures and machinery (e.g. hoarding, scaffolding, cranes, etc.) have the potential to result in changes in daylight & sunlight access in buildings, although any additional **neutral** impacts arising from temporary structures or machinery are likely to be **brief** to **short-term** and **imperceptible**.

16.4.3 Operational Phase

All impacts described in this section will be permanent. Impacts described as “imperceptible” and “not significant” are considered to be neutral in character. Any reduction in sunlight access resulting in a “slight”, “moderate”, “significant”, “very significant” or “profound” impact would usually be considered to be negative in character, unless otherwise indicated. Any increase in sunlight access resulting in a “slight”, “moderate”, “significant”, “very significant” or “profound” impact would usually be considered to be positive in character, unless otherwise indicated.

16.4.3.1 Daylight

16.4.3.1.1 Proposed Development – Spatial Daylight Autonomy (SDA)

The internal daylight analysis has been undertaken for aforementioned units, assessing KLD, kitchen, living room, and bedroom spaces for SDA. The analysis determined that **99.6%** of rooms assessed were in excess of the BRE Guidelines for SDA. One room in block BA07 and one room in block BZ25 was found to be non-compliant with the BRE Guide recommendation.

Compensatory Measures for spaces with non-compliant SDA levels are assigned based on relevance to each space. The list of these measures that may be applicable to each space are noted below. For specific allocation of each compensatory measure relevant to the SDA levels achieved, please refer to the IN2 Engineering Daylight and Sunlight Planning Report:

1. Daylight Adjacency: In cases where a room is below target, there are adjacent room/rooms within the apartment which were found to be comfortably compliant. Therefore, these units each have a room/rooms that are well daylit, despite the assessed room being slightly below target.
2. Sunlight: Where a room is below the SDA target, the units have the benefit of receiving over 3 hours of sunlight (medium exposure). Therefore, whilst the room will be found to be non-compliant for daylight, the apartment unit will achieve above the requisite sunlight availability.
3. Aspect: In addition to their private amenity space, the failing rooms have direct aspect out onto a well-lit landscaped communal or public open space providing an excellent view from the KLD space.
4. Open Space: The Proposed Development includes the provision of a large quantum of 1.91 Ha of public open space, exceeding the requirement (see CSR Landscape Design Statement for details) meaning that each of the units has easy access to quality public open space provision.

Therefore, it can be concluded that **99.6%** compliance rate for daylighting performance has been demonstrated for the Proposed Development.

Most rooms comply with the BRE Guide recommendations, with only two rooms being non-compliant. As a result, the impact on the Proposed Development during its operational phase is determined to be **permanently negative**. However, the impact is **not significant** since there are only two that do not comply with the BRE Guide.

16.4.3.1.2 Neighbouring Area

It has been determined that there is no impact on the current daylight received with regards to existing neighbouring buildings during the operational phase. This has been determined to be **neutral**, with **imperceptible effects** within the normal bounds of variation.

16.4.3.2 Sunlight

16.4.3.2.1 Proposed Development – Amenity Spaces

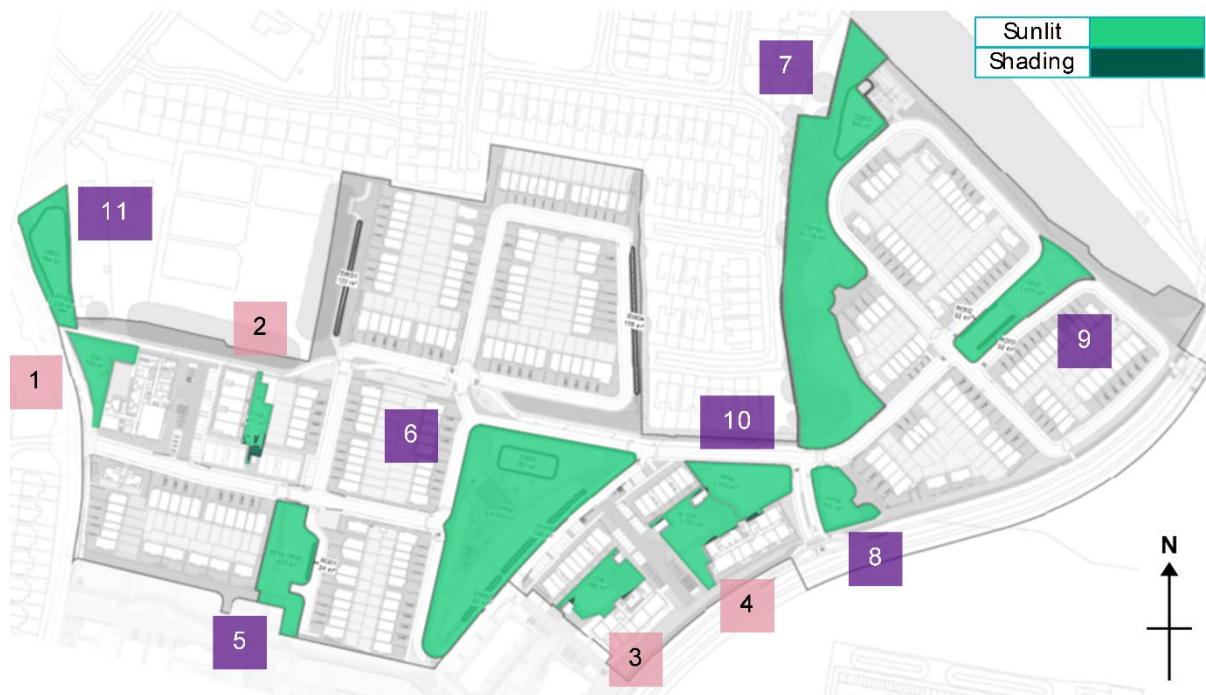


Figure 16.7 Proposed amenity area sunlight availability

Annual sunlight availability was analysed for the public and communal open spaces of the Proposed Development, calculating the extent of each area that can receive at least 2 hours of potential sunlight on 21st March. The proposed open spaces were found to receive excellent overall sunlight availability. The overall sunlit percentage for Communal Open Space (COS) and Public Open Space (POS) are **96.1%** and **99.9%**, respectively, which is well over the 50% compliance rate. As with the determined impact on daylight for operational phase, effect due to sunlight exposure to the Proposed Development has been demonstrated to be **permanent and neutral**, with **imperceptible impacts** to the Proposed Development, with excellent sunlight availability being received to amenity areas as illustrated in **Figure 16.7** above. In **Figure 16.7**, COS is identified by pink numeric labels, and POS is identified by purple numeric labels.

16.4.3.2.2 Proposed Development – Exposure to Sunlight (ETS)

As mentioned in section 16.2.5.2, an analysis was undertaken for the Proposed Development to assess the ETS that each unit can receive based on the BRE Guide. The assessment determined that **91.6%** of the assessed units would exceed the minimum guideline recommendations. Three units in block BA07 and thirteen units in block BA08 were found to be non-compliant with the BRE Guide recommendation.

Compensatory Measures for units with non-compliant ETS levels are assigned based on relevance to each unit. The list of these measures that may be applicable to each unit are noted below. For specific allocation of each compensatory measure relevant to the ETS levels achieved, please refer to the IN2 Engineering Daylight and Sunlight Planning Report:

Daylight Adjacency: Where a unit is below the ETS target, the rooms within have the benefit of exceeding the daylight requirement. Therefore, whilst the unit will be found to be non-compliant for sunlight, the unit will achieve above the requisite daylight availability.

1. Aspect: In addition to their private amenity space, a number of rooms have direct aspect out onto a well-lit landscaped communal or public open space, providing an excellent view from the KLD space.
2. Open Space: The Proposed Development includes the provision of a large quantum of 1.91 Ha of public open space, exceeding the requirement (see CSR Landscape Design Statement for details) meaning that each of the units has easy access to quality public open space provision.

Therefore, it can be concluded that **91.6%** compliance rate for sunlighting performance has been demonstrated for the Proposed Development.

Most units comply with the BRE Guide recommendations, with only seventeen units being non-compliant. As a result, the impact on the Proposed Development during its operational phase is determined to be **permanently negative**. However, the impact is **not significant** since there are only seventeen that do not comply with the BRE Guide.

16.4.3.2.3 Neighbouring Area

It has been determined to be **neutral**, with **imperceptible** impact to the current sunlight received with regards to existing neighbouring outdoor spaces, and potential neighbouring solar panels during its operational phase, within the normal bounds of variation.

16.4.4 Conclusion

Given that the potential for development to result in impacts on daylight & sunlight access diminishes with distance, it is the finding of IN2's analysis the Proposed Development will have no undue adverse impact on daylight & sunlight access within buildings in the wider area surrounding the Site.

These assessments determined that the Proposed Development will **not have significant impact** on the daylight & sunlight availability of the proposed and neighbouring buildings.

16.5 Mitigation Measures

16.5.1 Construction Phase

The subject application proposes the development of a greenfield Site zoned for development, within the Development Plan. In these circumstances, during the construction or operational phases scope for mitigation measures, which would preserve a sustainable level of density, is limited.

16.5.2 Operational Phase

The subject application proposes the development of a greenfield Site zoned for development, within the Development Plan. In these circumstances, during the construction or operational phases scope for mitigation measures, which would preserve a sustainable level of density, is limited.

The impacts of the Proposed Development on daylight & sunlight to itself have been mitigated through considered design and development to ensure the highest level of compliance for the operational phase and human health.

16.6 Residual Impacts

16.6.1 Construction Phase

As no ameliorative, remedial, or reductive development is proposed, the residual impact of the Proposed Development on daylight & sunlight access is predicted to be as described under Section 16.4 above.

16.6.2 Operational Phase

As no ameliorative, remedial, or reductive development is proposed, the residual impact of the Proposed Development on daylight & sunlight access is predicted to be as described under Section 16.4 above.

16.7 Indirect and / or Secondary Impacts

As no ameliorative, remedial, or reductive development is proposed, the indirect and / or secondary impact of the Proposed Development on daylight & sunlight access is predicted to be as described under Section 16.4 above.

16.8 Monitoring

16.8.1 Construction Phase

Monitoring of avoidance, remedial and mitigation measures is not relevant to the assessment of impacts on daylight & sunlight access in the case of the subject application because daylight & sunlight access determination is based on set parameters that do not change, namely: the suns annual movement through the sky, the location of the existing buildings, and the location and heights of the proposed buildings.

16.8.2 Operational Phase

Monitoring of avoidance, remedial and mitigation measures is not relevant to the assessment of impacts on daylight & sunlight access in the case of the subject application because daylight & sunlight access determination is based on set parameters that do not change, namely: the suns annual movement through the sky, the location of the existing buildings, and the location and heights of the proposed buildings.

16.9 Reinstatement

Reinstatement is not relevant to the assessment of impacts on daylight & sunlight access in the case of the subject application. It is intended that the Proposed Development will be permanent.

16.10 Interactions

16.10.1 Construction Phase

The key interaction between this chapter and other specialist chapters of the EIAR is with Chapter 7 (Population & Human Health), since impacts in relation to daylight & sunlight availability, e.g. overshadowing of neighbouring buildings, can negatively or positively affect residential amenity in the receiving environment.

The assessment determined that the **neutral short-term impacts** to neighbouring residential areas, including outdoor spaces, and potential solar panel locations, are **imperceptible**, and the Proposed Development itself will provide well-lit homes and amenity areas. All analysis were deemed to be compliant in accordance with the BRE Guide.

16.10.2 Operational Phase

The key interaction between this chapter and other specialist chapters of the EIAR is with Chapter 7 (Population & Human Health), since impacts in relation to daylight & sunlight availability, e.g. overshadowing of neighbouring buildings, can negatively or positively affect residential amenity in the receiving environment.

Following the BRE Guide's recommendations for essential daylight & sunlight, internal daylighting is required to meet more than 50% of the targeted illuminance in lux throughout the year. As detailed above, **99.6%** of rooms assessed were in excess of the BRE Guide recommendation for daylight, and compensatory measures are provided for the rooms that are not receiving the minimum guidelines recommendation.

In terms of sunlight, each unit needs to receive over 1.5 hours of sunlight on March 21st. **91.6%** of units assessed were in excess of the BRE Guide recommendation for sunlight, and compensatory measures are provided for the units that are not receiving the minimum guidelines recommendation.

The results demonstrate each of the proposal's amenity open spaces easily achieve compliance with the BRE Guide. All of the spaces were comfortably compliant with the BRE criteria to receive at least 2 hours of sunlight on March 21st, for at least 50% of the space. The overall sunlit percentage for Communal Open Space (COS) and Public Open Space (POS) are **96.1%** and **99.9%**, respectively, which is well over the 50% compliance rate.

The assessment determined that the **neutral long-term impacts** to neighbouring residential areas, including outdoor spaces, and potential solar panel locations, are **imperceptible**, and the Proposed Development itself will provide well-lit homes and amenity areas. All analysis were deemed to be compliant in accordance with the BRE Guide.

16.11 Cumulative Impacts

16.11.1 Construction Phase

In the preparation of this Chapter, regard has been had to the list of developments set out in Chapter 22 (Cumulative Impacts). No cumulative impacts are predicted for daylight & sunlight, as the results of daylight & sunlight assessments have determined that the impact caused by the Proposed Development is **imperceptible**.

16.11.2 Operational Phase

In the preparation of this Chapter, regard has been had to the list of developments set out in Chapter 22 (Cumulative Impacts). No cumulative impacts are predicted for daylight & sunlight, as the results of daylight & sunlight assessments have determined that the impact caused by the Proposed Development is **imperceptible**.

16.12 Difficulties Encountered

It was neither possible nor practical for the Design Team to gain unfettered access to every parcel of private property within the study area surrounding the Site in order to carry out measured building survey. Therefore, while IN2 have confidence that the three-dimensional model used in the assessment of the impact of the proposal on daylight & sunlight access achieves a high degree of accuracy. It should be noted that some level of assumption was necessary in completing the model.

16.13 References

- Ballymastone Phase 3 – Daylight and Sunlight Analysis Report (IN2, 2026)
- Planning Design Standards for Apartments: Guidelines for Planning Authorities, 2025 (the “2025 Apartment Guidelines”). These are guidelines issued under section 28 of the 2000 Planning and Development Act (as amended)
- The Building Research Establishment’s (BRE) Site Layout Planning for Daylight and Sunlight: A guide to good practice (BRE 209) 3rd edition/ 2022 edition, (the “BRE Guide”)
- British Standard BS EN 17037:2018 – Daylight in Buildings (+A1:2021) (Incorporating corrigendum October 2021) (the “British EN Standard”)
- Irish Standard IS EN 17037:2018 &AC:2021 (the “Irish EN Standard”)
- Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities, Section 5.3.7 (the “SRDCSG”)
- Urban Development and Building Height Guidelines, 2018 (the “UDBHG”)
- Environmental Protection Agency’s (EPA) Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR) 2022 (the “EPA’s EIAR”)

Chapter 17: Microclimate – Wind

17.1 Introduction

The wind microclimate assessment is based on building form and layout, which have not materially changed. As such, there is no change to the predicted wind conditions, mitigation measures or conclusions.

No significant updates are required for this chapter, and the assessment of impacts, mitigation measures, and residual effects remain as previously described in the original EIAR.

17.2 Method

No changes to methodologies that would affect the impact assessment.

17.3 Baseline Environment

There is no change to the baseline wind provided in the original EIAR.

17.4 Characteristics of the Proposed Development

Changes to the Proposed Development are addressed in Section 1.2 The Proposed Development of this EIAR Addendum

17.5 Predicted Impacts of the Proposed Development

There are no changes to the potential impacts on wind during construction or operation phase as provided in the original EIAR.

17.6 Cumulative Impacts

There is no change to the assessment of potential cumulative impacts for wind as provided in the original EIAR.

17.7 Mitigation Measures

There is no change to the mitigation measures for wind as provided in the original EIAR.

17.8 Residual Impacts

There is no change to the assessment of residual impacts on wind as provided in the original EIAR.

17.9 Indirect and / or Secondary Impacts

There is no change to the monitoring requirements for wind as provided in the original EIAR.

17.10 Interactions

There is no change to the assessment of potential interactions for wind as provided in the original EIAR.

17.11 Difficulties Encountered in Compiling the Chapter

There is no change to description of difficulties encountered in compiling the chapter for wind as provided in the original EIAR.

17.12 References

There is no change to the references as provided in the original EIAR.

Chapter 18: Traffic & Transportation

RFI 4(d):

The applicant is requested to provide an updated Chapter 18 (Traffic & Transportation) of the EIAR which presents a more detailed assessment of impact of construction phase traffic, including a detailed breakdown of construction material deliveries, indication of average and peak no. of HGVs during the construction programme, impact assessment of peak HGVs on junctions along the haul route, no. of site staff commuting to the site, indication of average and peak LGVs and when they occur during the construction programme.

Response: The following sections of Chapter 18 of the EIAR has been updated with additional information / text (in red) in responding to the RFI:

Section 18.5.2 Construction Phase

- **Breakdown of construction material deliveries:**
 - Based on a preliminary review of the existing survey data and proposed site levels, we estimate that approximately 85,700 m³ of cut being excavated with all of it being reused on site. The TII Carbon Tool included as part of this application gives a detailed breakdown of construction materials.
- **Indication of average and peak no. of HGVs during the construction programme:**
 - The anticipated total duration of the construction phase is 36 months. Following the completion of the initial site clearance works, the generation for HGV movements during the build period is likely to be evenly spread throughout the day and, as such, will not impact significantly during the peak traffic periods. For this scale of development it is not envisaged that HGV vehicle movements will exceed 4 vehicle movements per hour. This may increase slightly to 6-8 HGV vehicle movements per hour during the busiest period of construction activity.
- **Impact assessment of peak HGVs on junctions along the haul route:**
 - In both the AM and PM peak hours there is anticipated to be 2 HGVs travelling towards the subject site and 2 HGVs travelling away from the subject site. As a result there will be an increase of 4 HGV movements at Junction 1 (Proposed Site Access (N) / DDR), Junction 2 (Proposed Site Access (S) / DDR) and Junction 3 (DDR / New Road). All three of these junctions operate well within capacity with a maximum RFC value of 0.19 (19%), a maximum DoS value of 57% and a maximum DoS value of 56% respectively in the opening year 2028. Therefore it is not anticipated that any of these three junctions will be significantly impacted by the additional HGV movements.
 - **Table 18.5** below illustrates the significance of the impacts before the proposed mitigation activities are applied (as described in Section 18.6). The impacts of the construction phase prior to mitigation will have slight changes to the surrounding junctions.

- Considering the site's proximity to the strategic road network and following the implementation of the mitigation measures detailed in the CEMP through an appropriately detailed CTMP, it is concluded that construction traffic will not give rise to any significant traffic concerns or impede the operational performance of the local road network and its surrounding junctions.
- **No. of site staff commuting to the site:**
 - Based on experience of similar developments, a development of this type and scale is anticipated to require an overall average of c. 130 operatives across the programme with a peak of c. 265. On-site employees will generally arrive before 08:00, thus avoiding morning peak hour traffic. These employees will generally depart after 16:00. It should be noted that a large proportion of construction workers would arrive in shared transport.
- **Indication of average and peak LGVs and when they occur during the construction programme:**
 - On average the site will generate, no more than c. 40 two-way vehicle trips during the peak AM and PM periods over the period of the phased construction works. The peak requirement of c. 265 operatives on site is expected to occur over a relatively short period of the programme, potentially generating up to c. 80 two-way vehicle movements in the peak AM and PM periods. This peak requirement would be anticipated to be approximately 3 months after project commencement.

Table 18.1 Impact significance – Construction Phase (Prior to Mitigation)

Junction		Sensitivity	Residual Impact		
No.	Name		Quality	Significance	Duration
1	Proposed Site Access (N) / DDR	Low	Negative	Slight Effects	Short Term
2	Proposed Site Access (S) / DDR	Low	Negative	Slight Effects	Short Term
3	DDR / New Road	Low	Negative	Slight Effects	Short Term
4	Chapel View / Main Street	Low	Negative	Slight Effects	Short Term
5	Hearse Road / Main Street (L2170)	Low	Negative	Slight Effects	Short Term
6	Main Street (L2170) / Portrane Road	Low	Negative	Slight Effects	Short Term
7	Portrane Road / The Links	Low	Negative	Slight Effects	Short Term
8	DDR / Portrane Road	Low	Negative	Slight Effects	Short Term

Having regard to the clarifications and additional information provided above, there are no changes to the overall findings of Section 18.5 Predicted Impacts of the Proposed Development, Section 18.6 Mitigation Measures, or Section 18.7 Residual Impacts as detailed in Section 18.5, Section 18.6 and Section 18.7 respectively of Chapter 18 of the EIAR submitted with the original application.

Likewise, there are no changes to the Conclusion presented in Chapter 18 (Traffic & Transportation) of EIAR submitted with the original application.

Addendum to Chapter 18: Traffic & Transportation

With respect to the amendments to the Proposed Development detailed in Section 1.2 of this EIAR Addendum report, and the clarifications presented in this section, there are no changes to the conclusions set out in Chapter 18 of the EIAR regarding the potential impact the Proposed Development will have as a result of traffic.

No additional mitigation measures are required beyond those previously detailed in EIAR Chapter 18 (Traffic & Transportation).

The residual effects from traffic during the construction and operational phase of the development remains the same as set out in *Section 18.13 – Conclusion* of the EIAR as originally submitted.

18.1 Introduction

No significant updates are required for this chapter other than additional information and clarification provided for Section 18.5.3 (Construction Phase) as stated above, and the assessment of impacts, mitigation measures, and residual effects remain as previously described in the original EIAR.

18.2 Method

No changes to methodologies that would affect the impact assessment.

18.3 Baseline Environment

There is no change to the baseline traffic environment provided in the original EIAR.

18.4 Characteristics of the Proposed Development

There are no changes to the characteristics of the Proposed Development (other than as noted in section 1.2 of this Addendum) as provided in the original EIAR.

18.5 Predicted Impacts of the Proposed Development

There are no changes to the potential impacts from traffic during construction or operation phase as provided in the original EIAR.

18.6 Mitigation Measures

There is no change to the mitigation measures for traffic as provided in the original EIAR.

18.7 Residual Impacts

There is no change to the assessment of residual impacts for traffic as provided in the original EIAR.

18.8 Indirect and / or Secondary Impacts

There is no change to the assessment of potential indirect and / or secondary impacts for traffic as provided in the original EIAR.

18.9 Monitoring

There is no change to the monitoring requirements for traffic as provided in the original EIAR.

18.10 Interactions

There is no change to the assessment of potential interactions for traffic as provided in the original EIAR.

18.11 Cumulative Impacts

There is no change to the assessment of potential cumulative impacts for traffic as provided in the original EIAR.

18.12 Difficulties Encountered

There is no change to description of difficulties encountered in compiling the chapter for traffic as provided in the original EIAR.

18.13 Conclusion

There is no change to conclusion of the traffic impact assessment as provided in the original EIAR.

18.14 References

There is no change to the references as provided in the original EIAR.

Chapter 19: Material Assets – Waste

20.1 Introduction

The assessment of Material Assets – Waste, as set out in Chapter 19 of the original EIAR, has been reviewed having regard to the revised Proposed Development and the additional information submitted in response to the RFI 4(f).

No material changes arise in respect of the nature, scale or management of waste streams associated with the Proposed Development, and the findings of the original EIAR remain valid.

A revised Operational Waste Management Plan (OWMP) has been prepared in response to the RFI and is included as **Appendix 19.2** to this EIAR Addendum. The updated OWMP reflects the revised development parameters and provides further clarification and detail in respect of waste management procedures.

The revision of the OWMP does not give rise to any change in the assessment of impacts, mitigation measures or residual effects as previously identified.

20.2 Method

No changes to methodologies that would affect the impact assessment.

20.3 Baseline Environment

There is no change to the baseline material assets – waste provided in the original EIAR.

20.4 Predicted Impacts of the Proposed Development

There are no changes to the potential impacts on material assets – waste during construction or operation phase as provided in the original EIAR.

20.5 Mitigation Measures

There is no change to the mitigation measures for material assets – waste as provided in the original EIAR.

20.6 Residual Impacts

There is no change to the assessment of residual impacts on material assets – waste as provided in the original EIAR.

20.7 Indirect and / or Secondary Impacts

There is no change to the monitoring requirements for material assets – waste as provided in the original EIAR.

20.8 Monitoring

There is no change to the monitoring requirements for material assets – waste as provided in the original EIAR.

20.9 Interactions

There is no change to the assessment of potential interactions for material assets – waste as provided in the original EIAR.

20.10 Cumulative Impacts

There is no change to the assessment of potential cumulative impacts for material assets – waste as provided in the original EIAR.

20.11 Difficulties Encountered in Compiling the Chapter

There is no change to description of difficulties encountered in compiling the chapter for material assets – waste as provided in the original EIAR.

20.12 Conclusion

There is no change to the findings of the conclusion for material assets – waste as provided in the original EIAR.

20.13 References

There is no change to the references as provided in the original EIAR.

Chapter 20: Material Assets – Services

21.1 Introduction

The assessment of utilities including electricity, water supply, wastewater and telecommunications remains unchanged. The minor increase in unit numbers does not exceed available capacity or require additional infrastructure beyond that already assessed.

No significant updates are required for this chapter, and the assessment of impacts, mitigation measures, and residual effects remain as previously described in the original EIAR.

21.2 Method

No changes to methodologies that would affect the impact assessment.

21.3 Baseline Environment

There is no change to the baseline material assets - services provided in the original EIAR.

21.4 Predicted Impacts of the Proposed Development

There are no changes to the potential impacts on material assets - services during construction or operation phase as provided in the original EIAR.

21.5 Mitigation Measures

There is no change to the mitigation measures for material assets - services as provided in the original EIAR.

21.6 Residual Impacts

There is no change to the assessment of residual impacts on material assets - services as provided in the original EIAR.

21.7 Indirect and / or Secondary Impacts

There is no change to the monitoring requirements for material assets - services as provided in the original EIAR.

21.8 Monitoring

There is no change to the monitoring requirements for material assets - services as provided in the original EIAR.

21.9 Reinstatement

There is no change to the reinstatement requirements for material assets - services as provided in the original EIAR.

21.10 Interactions

There is no change to the assessment of potential interactions for material assets - services as provided in the original EIAR.

21.11 Cumulative Impacts

There is no change to the assessment of potential cumulative impacts for material assets - services as provided in the original EIAR.

21.12 Difficulties Encountered in Compiling the Chapter

There is no change to description of difficulties encountered in compiling the chapter for material assets - services as provided in the original EIAR.

21.13 References

There is no change to the references as provided in the original EIAR.

Chapter 21: Interactions of the Foregoing

The assessment of interactions between environmental factors has been reviewed in the context of the revised Proposed Development and the additional information submitted in response to the RFI. This review confirms that no new or altered interaction pathways arise, having regard to the limited nature of the revisions and the absence of new sources, pathways or receptors.

The principal update relates to Architectural Heritage (Chapter 15), and particular consideration has been given to its interaction with Landscape and Visual effects within a sensitive context, including a Protected Structure and the Architectural Conservation Area (ACA). The revised design and conservation approach has been developed to respond to the existing character, setting and visual context of heritage assets, ensuring that the form, layout and public realm integrate appropriately with the surrounding context. These refinements reinforce the relationship between cultural heritage and the visual environment but do not introduce any new or different interaction effects.

All other environmental factors remain as assessed in the original EIAR, and it is confirmed that there is no change to previously identified interaction effects, either alone or in combination with other developments, having regard to the updated cumulative assessment presented in Chapter 22. The conclusions of the original EIAR therefore remain valid and robust.

Chapter 22: Cumulative Impacts

The method used for the assessment of cumulative impacts in this EIAR Addendum is the same as that used in the original EIAR.

A review of planning activity within the study area has been undertaken to identify any developments permitted, proposed or under construction since the EIAR was prepared in October 2025. This review included consideration of Fingal County Council planning records and recently lodged or determined Large-scale Residential Development (LRD) applications.

The review confirms that no new strategic or large-scale developments have been permitted or lodged within the study area since October 2025 that would materially alter the baseline environment or the cumulative impact assessment presented in the original EIAR. One amendment application (LRD0070/S3E), relating to the Corballis East development, has been identified. This comprises modifications to an already permitted scheme, including changes to commercial/community provision and internal layout. Having regard to the nature of these amendments, it is considered that they do not materially alter the scale, extent or impact of the development previously assessed in the EIAR.

In addition, a number of minor planning applications (such as domestic extensions and small-scale alterations) have been identified within the wider Donabate area. These developments are limited in scale and are not considered capable of contributing to cumulative environmental effects.

It is also noted that a number of developments identified in the original EIAR (including Corballis East and Ballymastone Phases 1 and 2) have progressed to construction stage. This reflects the anticipated evolution of the baseline scenario and does not constitute new cumulative development. Accordingly, the list of permitted and Proposed Developments previously identified remains valid, with the addition of the following:

- LRD0070/S3E – Corballis East Amendment (lodged November 2025)

Table 22.1 below presents an addition to the list of relevant developments.

Table 22.1 Permitted and Proposed Developments (Post–October 2025)

Planning Authority Ref.	Development Name	Status	Scale / Key Details
FCC Reg Ref. <u>LRD0070/S3E</u>	Corballis East Phase 1 Amendment Development	Lodged (Nov 2025) Granted by FCC (Feb 2026)	Amendments to permitted Phase 1 LRD including revised commercial and community provision, reduction in residential units (54 No. to 52 No.), public realm enhancements, conservation and reuse of Protected Structure (Smyth's Bridge House) and associated buildings, and modifications to access, layout and pedestrian/cycle infrastructure.

Chapter 23: Mitigation Measures & Monitoring

The mitigation measures and monitoring requirements set out in the original EIAR have been reviewed in the context of the revised Proposed Development and the additional information submitted in response to the Request for Further Information (RFI). This review confirms that no new or revised mitigation measures or monitoring requirements are proposed, and the mitigation strategy as presented in the original EIAR remains valid and effective.

In relation to Architectural Heritage (Chapter 15), it is noted that the revised assessment includes further clarification under the mitigation by design approach (Section 15.5.1), which confirms that the scale and massing of the Proposed Development have been carefully considered to ensure that it does not materially affect the character and setting of the St. Ita's Hospital Complex ACA. This reflects the design-led mitigation embedded within the proposed scheme and does not constitute a change to the mitigation measures previously identified.

All other mitigation measures and monitoring requirements remain as set out in the original EIAR, and no changes arise in this regard.

EIAR Addendum Conclusion

With respect to the assessment carried out in this EIAR Addendum, it can be concluded that there is no change to the overall significance of effects from what is assessed and detailed in each Chapter of the EIAR submitted with the planning application on the 23 October 2025.

Appendices



Appendix 19.2: Operational Waste Management Plan



Trinity
Consultants

 **awnconsulting**

Operational Waste Management Plan

Project Title: Ballymastone Phase 3 Large-Scale Residential Development

CLIENT

Glenveagh
Living
Limited

DOCUMENT REFERENCE

247501.0318WR02a

DATE

28/05/2026

DOCUMENT CONTROL

Document Control Sheet		
Our Reference	247501.0318WR02a	
Original Issue Date	15/10/2025	
Client:	Glenveagh Living Limited	
Client Address:	Dublin	
Revision	Revision Date	Description
a	28/05/2026	RFI response

Details	Written by	Approved by
Signature		
Name	Chonaill Bradley	Dr Fergal Callaghan
Title	Associate	Director
Date	28/05/2026	28/05/2026

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This report considers the specific instructions and requirements of our client. It is not intended for third-party use or reliance, and no responsibility is accepted for any third party. The provisions in this report apply solely to this project and should not be assumed applicable to other developments without review and modification.



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1. INTRODUCTION

AWN Consulting, a Trinity Consultants Team, has prepared this Operational Waste Management Plan (RWMP) on behalf of Glenveagh Living Limited. The proposed development will consist of the construction of a residential development, which represents Phase 3 of the wider development of the Ballymastone Lands, ranging in height from 2- to 6-storeys, to accommodate 433 no. residential dwellings (including a mix of apartments, duplexes and houses), private amenity space, a crèche (c. 567sq.m), and a community space (c. 215sq.m). The site will accommodate 323 no. car parking spaces in total (comprised of 296 no. residential spaces, 9 no. spaces for the crèche, 1 no. accessible EV space, 2 no. standard (ducted) accessible spaces, 5 no. standard EV spaces, and 10 no. standard (ducted) spaces), 1,472 total no. bicycle parking spaces, new pedestrian/cycle links, road improvements, storage, services (including water, wastewater, electricity and telecommunications) and plant areas. Landscaping will include communal amenity areas, significant public open space (c. 17% of the overall site), and SuDS features.

This OWMP has been prepared to ensure that the management of waste during the operational phase of the proposed Development is undertaken in accordance with the current legal and industry standards including, the Waste Management Act 1996 as amended and associated Regulations ¹, Environmental Protection Agency Act 1992 as amended ², Litter Pollution Act 1997 as amended ³, the National Waste Management Plan for a Circular Economy 2024 - 2030 (NWMPCE) (2024) ⁴ and Fingal County Council (FCC) Storage, Presentation and Segregation of Household and Commercial Waste) Bye-Laws' 2020 ⁵. In particular, this OWMP aims to provide a robust strategy for the storage, handling, collection and transport of the wastes generated at Site.

This OWMP aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible. The OWMP also seeks to provide guidance on the appropriate collection and transport of waste to prevent issues associated with litter or more serious environmental pollution (e.g. contamination of soil or water resources). The plan estimates the type and quantity of waste to be generated from the proposed Development during the operational phase and provides a strategy for managing the different waste streams.

At present, there are no specific national guidelines in Ireland for the preparation of OWMPs. Therefore, in preparing this document, consideration has been given to the requirements of national and regional waste policy, legislation and other guidelines.

2. OVERVIEW OF WASTE MANAGEMENT IN IRELAND

2.1 National level

The Irish Government issued a policy statement in September 1998 entitled 'Changing Our Ways'⁶, which identified objectives for the prevention, minimisation, reuse, recycling, recovery and disposal of waste in Ireland. A heavy emphasis was placed on reducing reliance on landfill and finding alternative methods for managing waste. Amongst other things, Changing Our Ways stated a target of at least 35% recycling of municipal (i.e. household, commercial and non-process industrial) waste.

A further policy document, 'Preventing and Recycling Waste – Delivering Change' was published in 2002⁷. This document proposed a number of programmes to increase recycling of waste and allow diversion from landfill. The need for waste minimisation at source was considered a priority.

This view was also supported by a review of sustainable development policy in Ireland and achievements to date, which was conducted in 2002, entitled 'Making Ireland's Development Sustainable – Review, Assessment and Future Action'⁸. This document also stressed the need to decouple economic growth and waste generation, again through waste minimisation and reuse of discarded material.

In order to establish the progress of the Government policy document Changing Our Ways, a review document was published in April 2004 entitled 'Taking Stock and *Moving Forward*'⁹. Covering the period 1998 – 2003, the aim of this document was to assess progress to date with regard to waste management in Ireland, to consider developments since the policy framework and the local authority waste management plans were put in place, and to identify measures that could be undertaken to further support progress towards the objectives outlined in *Changing Our Ways*.

In particular, *Taking Stock and Moving Forward* noted a significant increase in the amount of waste being brought to local authority landfills. The report noted that one of the significant challenges in the coming years was the extension of the dry recyclable collection services.

In September 2020, the Irish Government published a new policy document outlining a new action plan for Ireland to cover the period of 2020-2025. This plan 'A Waste Action Plan for a Circular Economy'¹⁰ (WAPCE), was prepared in response to the 'European Green Deal' which sets a roadmap for a transition to a new economy, where climate and environmental challenges are turned into opportunities, replacing the previous national waste management plan "A Resource Opportunity"(2012).

The WAPCE sets the direction for waste planning and management in Ireland up to 2025. This reorientates policy from a focus on managing waste to a much greater focus on creating circular patterns of production and consumption. Other policy statements of a number of public bodies already acknowledge the circular economy as a national policy priority.

The policy document contains over 200 measures across various waste areas including circular economy, municipal waste, consumer protection and citizen engagement, plastics and packaging, construction and demolition, textiles, green public procurement and waste enforcement.

One of the first actions to be taken was the development of the *Whole of Government Circular Economy Strategy 2022-2023 'Living More, Using Less'* (2021)⁸ to set a course for Ireland to transition across all sectors and at all levels of Government toward circularity and was issued in December 2021. It is anticipated that the Strategy will be updated in full every 18 months to 2 years. However, at the date of authoring of this report there has been no update released.

The Circular Economy and Miscellaneous Provisions Act 2022¹² was signed into law in July 2022. The Act underpins Ireland's shift from a "take-make-waste" linear model to a more sustainable pattern of

production and consumption, that retains the value of resources in our economy for as long as possible and that will to significantly reduce our greenhouse gas emissions. The Act defines Circular Economy for the first time in Irish law, incentivises the use of recycled and reusable alternatives to wasteful, single-use disposable packaging, introduces a mandatory segregation and incentivised charging regime for commercial waste, streamlines the national processes for End-of-Waste and By-Products decisions, tackling the delays which can be encountered by industry, and supporting the availability of recycled secondary raw materials in the Irish market, and tackles illegal fly-tipping and littering.

The Department of Housing, Local Government and Heritage authored Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities (2024) ¹³, suggests the below thresholds at which the need for the supplemental information such as the OWMP should be considered.

- ▶ 30 or more residential units.

Since 1998, the Environmental Protection Agency (EPA) has produced periodic 'National Waste (Database) Reports' which as of 2023 have been renamed Circular Economy and Waste Statistics Highlight Reports ¹⁴ detailing, among other things, estimates for household and commercial (municipal) waste generation in Ireland and the level of recycling, recovery and disposal of these materials. The 2024 National Circular Economy and Waste Statistics web resource, which is the most recent study published, along with the national waste statistics web resource (2024) reported the following key statistics for 2022:

- ▶ *Generated – Ireland produced 3,190,000 t of municipal waste in 2022. This is a slight increase since 2021. Of this, 55% came from households and 45% came from commercial and public service sources.*
- ▶ *Managed –In 2022, a total of 1.76 million Household waste collected and treated by the waste industry.*
- ▶ *Unmanaged – An estimated 36,970 tonnes of household waste was unmanaged waste i.e., not disposed of in the correct manner in 2022.*
- ▶ *Recovered – A rounded 1.3 million tonnes of Ireland's municipal waste went for incineration with energy recovery in 2022. This tonnage is 43% of municipal waste managed and a marginal increase on the 42% achieved in 2021.*
- ▶ *Recycled –Some 1.3 million tonnes of municipal waste generated in Ireland was recycled in 2022, resulting in a recycling rate of 41% . This indicates that we face significant challenges to meet the upcoming EU recycling targets for 2025 to 2035*
- ▶ *Of the municipal waste recycled in 2022, over 825,000 tonnes went for material recycling (approximately the same as 2021) and over 480,000 tonnes were treated by composting/anaerobic digestion (approximately the same as 2021 but up 37% on 2020). The large increase of composted/anaerobically digested biowaste from 2020 is mainly due to a change in our way of estimating home composting.*
- ▶ *Disposed – Ireland's landfill rate for municipal waste managed was 15% in 2022. This is a 1% decrease from 2021's rate of 16%.*
- ▶ *Reuse – 54,800 tonnes of second-hand products we estimated by the EPA to have been reused in Ireland in 2021. The average annual Reuse rate per person in Ireland is 10.6 kg per person.*

2.2 Regional Level

The proposed Development is located in the Local Authority administrative area of Fingal County Council (FCC).

The Eastern Midlands Region (EMR) Waste Management Plan 2015 – 2021, which previously governed waste management policy in the FCC area, has been superseded as of March 2024 by the National Waste Management Plan for a Circular Economy (NWMPCE) 2024 – 2030, the national waste management plan for Ireland.

The NWMPCE does not dissolve the three regional waste areas. The NWCPCE sets the ambition of the plan to have a 0% total waste growth per person over the life of the Plan with an emphasis on non-household wastes including waste from commercial activities and the construction and demolition sector. This Plan seeks to influence sustainable consumption and prevent the generation of waste, improve the capture of materials to optimise circularity and enable compliance with policy and legislation.

The national plan sets out the following strategic targets for waste management in the country that are relevant to the development:

This Plan seeks to influence sustainable consumption and prevent the generation of waste, improve the capture of materials to optimise circularity and enable compliance with policy and legislation.

The national plan sets out the following strategic targets for waste management in the country that are relevant to the development:

National Targets

- 1A. (Residual Municipal Waste) 6% Reduction in Residual Municipal Waste per person by 2030
- 2A. (Contamination of Materials) 90% of Material in Compliance in the Dry Recycling Bin
- 2B. (Material Compliance Residual) 10% per annum increase in Material Compliance in the residual bin. (90% by the end of 2030)
- 3A. (Reuse of Materials) 20kg Per person / year – Reuse of materials like cloths or furniture to prevent waste.

Municipal landfill charges in Ireland are based on the weight of waste disposed. In the Leinster Region, charges are approximately €140-160 per tonne of waste, which includes a €85 per tonne landfill levy introduced under the Waste Management (Landfill Levy) (Amendment) Regulations 2015. *The Circular Economy (Waste Recovery Levy) Regulations 2024* ¹⁵ will also incur a levy of €10 per tonne for waste accepted for recovery. This will include backfilling at authorised recovery sites and at municipal waste landfills.

The *Fingal Development Plan 2023 – 2029* ¹⁶ sets out a number of objectives for the Fingal region in line with the objectives of the regional waste management plan, including the following:

- ▶ **Objective IU034 – Waste Management in New Developments -**
Require the provision of appropriate, well designed, accessible space to support the storage, separation and collection of as many waste and recycling streams as possible in all new commercial and residential developments within the County.
- ▶ **Objective DMS0234 – Provision of Public Bring Banks -**
Ensure the provision of public bring banks in all large retail developments, unless there are existing facilities within a 1 km radius. Bring bank facilities will generally be required at appropriate locations in the following development types:
 - *In conjunction with significant new commercial developments, or extensions to existing developments.*
 - *In conjunction with new waste infrastructure facilities, proposals should include bring facilities for the acceptance of non-hazardous and hazardous wastes from members of the public and small businesses.*

- *In conjunction with medium and large scale residential and mixed-use developments providing in excess of 10 residential units, proposals should provide recycling and bring bank facilities to serve residents and in some appropriate locations, the wider community.*
 - *In conjunction with all large retail developments provide space for reverse vending machines to promote the circular economy.*
- **Objective DMSO235 – Communal Refuse Storage Provision** - *In the case of communal refuse storage provision, the collection point for refuse should be accessible both to the external collector and to the resident and be secured against illegal dumping by non-residents. In the case of individual houses, the applicant shall clearly show within a planning application the proposed location and design of bin storage to serve each dwelling and having regard to the number of individual bins required to serve each dwelling at the time of the application and any possible future requirements for refuse storage/collection. The following criteria will be considered in the assessment of the design and siting of waste facilities and bring facilities:*
- *The location and design of any refuse storage or recycling facility should ensure that it is easily accessible both for residents and/or public and for bin collection, be insect and vermin proofed, will not present an odour problem, and will not significantly detract from the residential amenities of adjacent property or future occupants.*
 - *Provision for the storage and collection of waste materials shall be in accordance with the guidelines for waste storage facilities in the relevant Regional Waste Management Plan and the design considerations contained in Section 4.8 and 4.9 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, DHLGH (2020).*
 - *Refuse storage for houses should be externally located, concealed / covered and adequate to cater for the size and number of bins normally allocated to a household. For terraced houses, the most appropriate area for bins to be stored is to the front of the house, which should be located in well-designed enclosures that do not detract from visual amenity.*
 - *All applications shall clearly identify the waste storage and collection points and detail the anticipated waste collection schedule having regard to the impact on road users both within the development and the surrounding area.*
 - *Access to private waste storage in residential schemes should be restricted to residents only.*
- **Objective DMSO236 – Segregation and Collection of Waste** - *Ensure all new large-scale residential and mixed-use developments include appropriate facilities for source segregation and collection of waste.*
- **Objective DMSO237 – Distance from Front Door to Communal Bin Area** - *Ensure all new residential schemes include appropriate design measures for refuse storage areas, details of which should be clearly shown at pre-planning and planning application stage. Ensure refuse storage areas are not situated immediately adjacent to the front door or ground floor window, unless adequate screened alcoves or other such mitigation measures are provided.*
- **Objective DMSO239 – Refuse storage areas** - *Ensure all new residential schemes include appropriate design measures for refuse storage areas, details of which should be clearly shown at pre-planning and planning application stage. Ensure refuse storage areas are not situated immediately adjacent to the front door or ground floor window, unless adequate screened or other such mitigation measures are provided.*
- **Objective DMSO240 – Distance to Communal Bin Areas** - *Ensure the maximum distance between the front door to a communal bin area does not exceed 50 metres.*

2.3 Legislative Requirements

The primary legislative instruments that govern waste management in Ireland and applicable to the proposed Development are:

- ▶ *Waste Management Act 1996 as amended;*
- ▶ *Environmental Protection Agency Act 1992 as amended;*
- ▶ *Litter Pollution Act 1997 as amended;*
- ▶ *Planning and Development Act 2000 as amended* ¹⁷;
- ▶ *Circular Economy and Miscellaneous Provisions Act 2022.*

These Acts and subordinate Regulations transpose the relevant European Union Policy and Directives into Irish law.

One of the guiding principles of European waste legislation, which has in turn been incorporated into the Waste Management Act 1996 as amended and subsequent Irish legislation, is the principle of “Duty of Care”. This implies that the waste producer is responsible for waste from the time it is generated through until its legal disposal (including its method of disposal). As it is not practical in most cases for the waste producer to physically transfer all waste from where it is produced to the final disposal area, waste contractors will be employed to physically transport waste to the final waste disposal site.

It is, therefore, imperative that the residents, crèche tenant, community space tenants and the proposed facilities management company undertake on-site management of waste in accordance with all legal requirements and that the facilities management company employ suitably permitted / licenced contractors to undertake off-site management of their waste in accordance with all legal requirements. This includes the requirement that a waste contractor handle, transport and reuse / recover / recycle / dispose of waste in a manner that ensures that no adverse environmental impacts occur as a result of any of these activities.

A collection permit to transport waste must be held by each waste contractor which is issued by the National Waste Collection Permit Office (NWCPO). Waste receiving facilities must also be appropriately permitted or licensed. Operators of such facilities cannot receive any waste, unless in possession of a Certificate of Registration (COR) or waste permit granted by the relevant Local Authority under the Waste Management (Facility Permit & Registration) Regulations 2007, as amended, or a Waste Licence granted by the EPA. The COR / permit / licence held will specify the type and quantity of waste able to be received, stored, sorted, recycled, recovered and / or disposed of at the specified site.

2.3.1 Fingal County Council Waste Management Bye-Laws

The FCC “*Segregation, Storage and Presentation of Household and Commercial Waste Bye-Laws 2020*” came into effect in March 2020. The Bye-Laws set a number of enforceable requirements on waste holders and collectors with regard to storage, separation, presentation and collection of waste within the FCC functional area. Key requirements under these *Waste Bye-Laws* are:

- ▶ *Kerbside waste presented for collection shall not be presented for collection earlier than 6:00pm on the day immediately preceding the designated waste collection day;*
- ▶ *All containers used for the presentation of kerbside waste and any uncollected waste shall be removed from any roadway, footway, footpath or any other public place no later than 9:00am on the day following the designated waste collection day;*
- ▶ *Neither recyclable household kerbside waste nor food waste arising from households shall be contaminated with any other type of waste before or after it has been segregated; and*
- ▶ *A management company, or another person if there is no such company, who exercises control and supervision of residential and/or commercial activities in multi-unit developments, mixed-use developments, flats or apartment blocks, combined living/working spaces or other similar complexes shall ensure that:*
 - *Separate receptacles of adequate size and number are provided for the proper segregation, storage and collection of recyclable household kerbside waste and residual household kerbside waste;*

- *Additional receptacles are provided for the segregation, storage and collection of food waste where this practice is a requirement of the national legislation on food waste;*
- *The receptacles referred to in paragraphs (a) and (b) are located both within any individual apartment and at the place where waste is stored prior to its collection;*
- *Any place where waste is to be stored prior to collection is secure, accessible at all times by tenants and other occupiers and is not accessible by any other person other than an authorised waste collector,*
- *Written information is provided to each tenant or other occupier about the arrangements for waste separation, segregation, storage and presentation prior to collection;*
- *An authorised waste collector is engaged to service the receptacles referred to in this section of these bye-laws, with documentary evidence, such as receipts, statements or other proof of payment, demonstrating the existence of this engagement being retained for a period of no less than two years. Such evidence shall be presented to an authorised person within a time specified in a written request from either that person or from another authorised person employed by Fingal County Council;*
- *Receptacles for kerbside waste are presented for collection on the designated waste collection day; and*
- *Adequate access and egress onto and from the premises by waste collection vehicles is maintained.*

The full text of the Waste Bye-Laws is available from the FCC website.

2.4 Regional Waste Management Service Providers and Facilities

Various contractors offer waste collection services for the residential sector in the FCC region. Details of waste collection permits (granted, pending and withdrawn) for the region are available from the NWCPO.

As outlined in the regional waste management plan, there is a decreasing number of landfills available in the region. Only three municipal solid waste landfills remain operational and all are operated by the private sector. There are a number of other licensed and permitted facilities in operation in the region including waste transfer stations, hazardous waste facilities and integrated waste management facilities. There are two existing thermal treatment facilities, one in Duleek, Co. Meath and a second in Poolbeg in Dublin.

There is Estuary Recycling Centre at Greenfields, Swords, Dublin, located c. 7.9 km to the south west of the Development Site, which can be utilised by the residents of the proposed Development for other household waste streams while a bottle bank can be found c. 800 m to the west at Donabate Portrane Community Centre.

A copy of all CORs and waste permits issued by the Local Authorities are available from the NWCPO website and all Waste Licenses issued are available from the EPA.

3. DESCRIPTION OF THE DEVELOPMENT

3.1 Location, Size and Scale of the Development

"The following description of the proposed development has been updated to include relevant revisions arising from the request for additional information: In summary, the proposed development will consist of the construction of a residential development, which represents Phase 3 of the wider development of the Ballymastone Lands, ranging in height from 2- to 6-storeys, to accommodate 433 no. residential dwellings (including a mix of apartments, duplexes and houses), private amenity space, a crèche (c. 567sq.m), and a community space (c. 215sq.m). The site will accommodate 323 no. car parking spaces in total (comprised of 296 no. residential spaces, 9 no. spaces for the crèche, 1 no. accessible EV space, 2 no. standard (ducted) accessible spaces, 5 no. standard EV spaces, and 10 no. standard (ducted) spaces), 1,472 total no. bicycle parking spaces, new pedestrian/cycle links, road improvements, storage, services (including water, wastewater, electricity and telecommunications) and plant areas. Landscaping will include communal amenity areas, significant public open space (c. 17% of the overall site), and SuDS features."

3.2 Typical Waste Categories

The typical non-hazardous and hazardous wastes that will be generated at the proposed Development will include the following:

- ▶ Dry Mixed Recyclables (DMR) - includes waste paper (including newspapers, magazines, brochures, catalogues, leaflets), cardboard and plastic packaging, metal cans, plastic bottles, aluminium cans, tins and Tetra Pak cartons;
- ▶ Organic waste – food waste and green waste generated from internal plants / flowers;
- ▶ Glass; and
- ▶ Mixed Non-Recyclable (MNR)/General Waste.

In addition to the typical waste materials that will be generated at the development on a daily basis, there will be some additional waste types generated less frequently / in smaller quantities which will need to be managed separately including:

- ▶ Drink Cans and Bottles (Deposit Return Scheme)
- ▶ Green / garden waste may be generated from external landscaping;
- ▶ Batteries (both hazardous and non-hazardous);
- ▶ Waste electrical and electronic equipment (WEEE) (both hazardous and non-hazardous);
- ▶ Printer cartridges / toners;
- ▶ Chemicals (paints, adhesives, resins, detergents, etc.);
- ▶ Light bulbs;
- ▶ Textiles;
- ▶ Waste cooking oil (if any generated by the residents and/or creche tenant);
- ▶ Furniture (and, from time to time, other bulky wastes); and
- ▶ Abandoned bicycles.

Wastes will be segregated into the above waste types to ensure compliance with waste legislation and guidance while maximising the re-use, recycling and recovery of waste with diversion from landfill wherever possible.

3.3 List of Waste Codes

In 1994, the *European Waste Catalogue*¹⁸ and *Hazardous Waste List*¹⁹ were published by the European Commission. In 2002, the EPA published a document titled the *European Waste Catalogue and Hazardous*

Waste List ²⁰, which was a condensed version of the original two documents and their subsequent amendments. This document has recently been replaced by the EPA ` *Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous* ²⁰ 2018. This waste classification system applies across the EU and is the basis for all national and international waste reporting, such as those associated with waste collection permits, COR's, permits and licences and EPA National Waste Database.

Under the classification system, different types of wastes are fully defined by a code. The List of Waste (LoW) code for typical waste materials expected to be generated during the operation of the proposed development are provided in Table 3.1 below.

Table 3.1 Typical Waste Types Generated and LoW Codes

Waste Material	LoW Code
Paper and Cardboard	20 01 01
Plastics	20 01 39
Metals	20 01 40
Mixed Non-Recyclable Waste	20 03 01
Glass	20 01 02
Biodegradable Kitchen Waste	20 01 08
Oils and Fats	20 01 25
Textiles	20 01 11
Batteries and Accumulators*	20 01 33* - 34
Printer Toner/Cartridges*	20 01 27* - 28
Green Waste	20 02 01
WEEE*	20 01 35*-36
Chemicals (solvents, pesticides, paints & adhesives, detergents, etc.) *	20 01 13*/19*/27*/28/29*30
Fluorescent tubes and other mercury containing waste*	20 01 21*
Bulky Wastes	20 03 07

** Individual waste type may contain hazardous materials*

4. ESTIMATED WASTE ARISING

A waste generation model (WGM) developed by AWN has been used to predict waste types, weights and volumes expected to arise from operations within the proposed Development. The WGM incorporates building area and use and combines these with other data, including Irish and US EPA waste generation rates.

The estimated quantum / volume of waste that will be generated from the residential units has been determined based on the predicted occupancy of the units. The residential waste figures include the waste generated in communal areas. While the floor area usage (m²) has been used to estimate the waste arising from the crèche.

The estimated waste generation for the proposed Development for the main waste types is presented in Tables 4.1 – 4.3.

Table 4.1 Estimated Waste Generation for Residential Units

Waste Type	Waste Volume (m ³ / week)			
	2 Bed – Units (Individual)	3 Bed – Units (Individual)	4 Bed – Units (Individual)	Apartment ¹ Block BA07 (Shared)
Organic Waste	0.02	0.02	0.02	0.68
Mixed Dry Recyclables	0.11	0.13	0.18	4.81
Glass	0.01	0.01	0.01	0.13
Mixed Municipal Waste	0.07	0.08	0.09	2.53
Total	0.21	0.24	0.30	8.14

1 – 36 no. 1 bed, 15 no. 2 Bed (BS:5906 – 6.15m³)

Table 4.2 Estimated Waste Generation for Residential Units

Waste Type	Waste Volume (m ³ / week)			
	Apartment ¹ Block BA08 (Shared)	Apartment ² Block BA09 (Shared)	Duplex Block ³ BZ04 & BZ25 (Shared)	Duplex Block ⁴ BZ08 (Shared)
Organic Waste	0.78	0.57	0.17	0.02
Mixed Dry Recyclables	5.56	4.04	1.18	0.17
Glass	0.15	0.11	0.03	0.00
Mixed Municipal Waste	2.92	2.13	0.62	0.09
Total	9.42	6.85	2.01	0.28

1 - 45 no. 1 bed, 15 no. 2 Bed (BS:5906 – 7.05m³)

2 - 34 no. 1 bed, 10 no. 2 Bed (BS:5906 – 5.01m³)

3 – 2 no. 2 bed, 7 no. 3 Bed (BS:5906 – 2.02m³) Upstairs Units only

4 - 2 no. 1 Bed (BS:5906 – 0.20m³) Upstairs Units only

Table 4.3 Estimated Waste Generation for Crèche and Community Units

Waste Type	Waste Volume (m ³ / week)			
	Crèche (Individual)	Community Space (Individual)		

Organic Waste	0.04	0.02		
Mixed Dry Recyclables	1.50	0.25		
Glass	0.01	0.22		
Mixed Municipal Waste	0.82	0.01		
Total	2.36	0.49		

*BS5906:2005 Waste Management in Buildings – Code of Practice*²¹ has been considered in the calculations of waste estimates. AWN's modelling methodology is based on recently published data and data from numerous other similar developments in Ireland and is based on AWN's experience, it provides a more representative estimate of the likely waste arisings from the proposed Development.

5. WASTE STORAGE AND COLLECTION

This section provides information on how waste generated within the site will be stored and collected. This has been prepared with due consideration of the proposed Site layout as well as best practice standards, local and national waste management requirements, including those of FCC. In particular, consideration has been given to the following documents:

- ▶ BS 5906:2005 Waste Management in Buildings – Code of Practice,
- ▶ The NWMPCE (2024);
- ▶ FCC Fingal County Council Development Plan 2023-2029 (2023);
- ▶ FCC Segregation, Storage and Presentation of Household and Commercial Waste Bye-Laws (2020); and
- ▶ DoHLGH, Design Standards for Apartments, Guidelines for Planning Authorities (2025) ²².

Waste Storage Areas

Locations of all Waste Storage Areas (WSAs) can be viewed on the drawings submitted with the planning application under separate cover and appendix a of this report.

Individual Waste Storage Areas

Residents in houses and some duplex units will have their own individual WSA allocated in their rear garden where external access is available. Where external access to the rear yard is not available a shielded bin store will be allocated at the front of the house.

Duplex Blocks **BZ04**, **BZ08** and **BZ25** have a mix of units that require a shared WSA and units with individual waste storage areas.

Shared Waste Storage areas

Apartment Block BA07

One (1 no.) shared communal WSA has been allocated within the development design for residential apartment Block BA07. This has been strategically located internally at ground floor level.

Residential Block BA08

One (1 no.) shared communal WSA has been allocated within the development design for residential apartment Block BA08. This has been strategically located internally at ground floor level.

Residential Block BA09

One (1 no.) shared communal WSA has been allocated within the development design for residential apartment Block BA09. This has been strategically located internally at ground floor level.

Shared Residential Duplex Block Units

Two (2 no.) shared WSAs have been allocated within the development design for the residential Duplex blocks in **BZ04**, **BZ08** and **BZ25**. These have been strategically located on the ground floor level, in external locations (**BX23 – BZ08 & BX24 – BZ04 & BZ25**).

Commercial Waste Storage areas

Crèche and Community Space

One (1 no.) WSA has been allocated within the development design for the creche and community space. This has been strategically located at ground floor level, within the creche building (BA09).

The temporary staging areas are such that it will not obstruct traffic or pedestrians (allowing a footway path of at least 1.8m, the space needed for two wheelchairs to pass each other) as is recommended in the *Design Manual for Urban Roads and Streets* (2019) ²³.

Using the estimated waste generation volumes in Tables 4.1 – 4.3, above, the waste receptacle requirements for MNR, DMR, organic waste and glass have been established for the WSA's. It is envisaged all waste will be collected on a weekly basis.

Waste Storage Requirements

Estimated waste storage requirements for the operational phase of the proposed Development are detailed in Table 5.1, below.

Table 5.1 Waste storage requirements for the proposed development

Area/Use	Bins Required			
	MNR ¹	DMR ²	Glass	Organic
Apartment Block BA07	3 x 1100L	5 x 1100L	1 x 240L	3 x 240L
Apartment Block BA08	3 x 1100L	5 x 1100L	1 x 240L	4 x 240L
Apartment Block BA09	2 x 1100L	4 x 1100L	1 x 240L	3 x 240L
Duplex Block BZ04 & BZ25 (Shared BX24)	1 x 1100L	1 x 1100L 1 x 240L	1 x 240L	1 x 240L
Duplex Block BZ08 (Shared BX23)	2 x 240L	2 x 240L	Bottle Bank	2 x 240L
Individual Units	1 x 240L	1 x 240L	Bottle Bank	1 x 240L
Creche and Community Space	1 x 1100L 1 x 240L	2 x 1100L 1 x 240L	1 x 120L	1 x 120L

Note: ¹ = Mixed Non-Recyclables

² = Dry Mixed Recyclables

The waste receptacle requirements have been established from distribution of the total weekly waste generation estimate into the holding capacity of each receptacle type.

Waste storage receptacles as per Table 5.1 above (or similar appropriate approved containers) will be provided by the facilities management company in the WSA's.

The types of bins used will vary in size, design and colour dependent on the appointed waste contractor. However, examples of typical receptacles to be provided in the WSA's are shown in Figure 5.1. All waste receptacles used will comply with the SIST EN 840-1:2020 and SIST EN 840-2:2020 as the standards for performance requirements of mobile waste containers, where appropriate.

Figure 5-1. Typical waste receptacles of varying size (240L and 1100L)



Receptacles for organic, mixed dry recyclable, glass and mixed non-recyclable waste will be provided in the WSAs prior to first occupation of the development i.e. prior to the first residential unit or crèche unit being occupied.

Residents in houses will be required to supply their own waste receptacles. Bins for the apartment block and creche unit WSA's will be supplied by the facilities management company.

This Plan will be provided to each resident and tenant from first occupation of the development i.e. once the first residential unit or crèche unit is occupied. This Plan will be supplemented, as required, by the property management company with any new information on waste segregation, storage, reuse and recycling initiatives that are subsequently introduced.

5.1 Operational Phase Waste Storage – Residential Units

Residents will be required to segregate waste into the following main waste streams:

- ▶ DMR;
- ▶ MNR;
- ▶ Glass; and
- ▶ Organic waste.

Residents with shared WSAs listed in Table 5.1 have been allocated communal WSAs on ground level. Residents in houses and duplex units with their own WSAs will have their own individual WSAs allocated in their rear garden where external access is available. Where external access to the rear yard is not available a shielded bin store will be allocated at the front of the house.

Provision will be made in all residential units to accommodate 3 no. bin types to facilitate waste segregation at source. An example of a potential 3 bin storage system is provided in Figure 5.3 below.

Figure 5.3 Example three bin storage system to be provided within the unit design



Graphical signage will be erected by facilities management in shared bin stores, above or on the bins to show exactly which wastes can be put in each. Bins/containers will also be colour coded to avoid cross contamination of the different waste streams.

Access to the shared WSA's will be restricted to authorised residents, facilities management and waste contractors by means of a key or electronic fob access.

Other waste materials such as drink cans, textiles, batteries, printer toner/cartridges, cooking oil and WEEE may be generated infrequently by the residents. Residents will be required to identify suitable temporary storage areas for these waste items within their own units and dispose of them appropriately. Further details on additional waste types can be found in Section 5.4.

5.2 Waste Storage – Crèche & Community Space

The crèche tenant and community space tenants will be required to segregate waste within their own unit into the following main waste types:

- ▶ DMR;
- ▶ MNR;
- ▶ Glass; and
- ▶ Organic waste.

The tenants will be required to take their segregated waste materials to their designated WSA and deposit their segregated waste into the appropriate bins. The location of the WSA is illustrated in the drawings submitted with the planning application under separate cover and in appendix A of this report.

Suppliers for the tenants will be requested by the tenant to make deliveries in reusable containers, minimize packaging or remove any packaging after delivery, where possible, to reduce waste generated by the proposed development.

If a kitchen is allocated in the crèche this will contribute a significant portion of the volume of waste generated on a daily basis, and as such it is important that adequate provision is made for the storage and transfer of waste from these areas to the WSA.

If a kitchen is required it is anticipated that waste will be generated the kitchen throughout the day, primarily at the following locations:

- ▶ Food Storage Areas (i.e. cold stores, dry store, freezer stores and stores for decanting of deliveries);
- ▶ Meat Preparation Area;
- ▶ Vegetable Preparation Area;
- ▶ Cooking Area;
- ▶ Dish-wash Area;

Small bins will be placed adjacent to each of these areas for temporary storage of waste generated during the day. Waste will then be transferred from each of these areas to the appropriate waste store within their unit.

All bins / containers in the tenants' areas and WSAs will be clearly labelled and colour coded to avoid cross contamination of the different waste streams. Signage will be posted above or on the bins to show exactly which wastes can be put in each.

Other waste materials such as drink cans, textiles, batteries, lightbulbs, WEEE, cooking oil and printer toner / cartridges will be generated less frequently. The tenant will be required to store these waste types within their own unit and arrange collection with an appropriately licensed waste contractor. Facilities management may arrange collection, depending on the agreement. Further details on additional waste types can be found in Section 5.4.

5.3 Waste Collection

There are numerous private contractors that provide waste collection services in the FCC area. All waste contractors servicing the development must hold a valid waste collection permit for the specific waste types collected. All waste collected must be transported to registered / permitted / licensed facilities only.

Bins from the shared WSA's will be brought their allocated temporary staging / collection areas by the waste contractor or facilities management, depending on agreement, prior to collection. Bins will be returned to the shared WSA's immediately following collection in line with the FCC waste byelaws. Crèche staff and residents with individual WSAs will be responsible for relocating their bins to and from the curb on designated collection days. A road sweep analysis of the development can be found in appendix B of this report.

Suitable access and egress have been provided to enable the bins to be moved easily from the temporary staging area's to the waste collection vehicles on the appropriate days. Waste will be collected at agreed days and times by the nominated waste contractors.

All waste receptacles will be clearly identified as required by waste legislation and the requirements of the FCC *Waste Bye-Laws*. Waste will be presented for collection in a manner that will not endanger health, create a risk to traffic, harm the environment or create a nuisance through odours or litter.

It is recommended that bin collection times are staggered to reduce the number of bins required to be emptied at once and the time the waste vehicle is on-Site. This will be determined during the process of appointment of a waste contractor.

5.4 Additional Waste Materials

In addition to the typical waste materials that are generated on a daily basis, there will be some additional waste types generated from time to time that will need to be managed separately. A non-exhaustive list is presented below.

Deposit Return Scheme

Most drinks containers can be recycled via the deposit return scheme, such as bottles, cans and tins made from plastic, aluminium or steel can be returned once they are between 150ml and 3 litres in size and have the Re-turn logo on them.

At the shops you can either return the containers:

- ▶ Using a Reverse Vending Machine (RVM)
- ▶ Manually in the shop

If a shop does not have a RVM but they sell containers with the Re-turn logo, the shop may allow you to manually return containers in store, unless they have a take back exemption.

Locations of RVM machines can be found via the Re-turn website (www.re-turn.ie)

Green Waste

Green waste may be generated from gardens, external landscaping and internal plants / flowers. Green waste generated from landscaping of external areas will be removed by external landscape contractors. Green waste generated from gardens internal plants / flowers can be placed in the organic waste bins.

Batteries

A take-back service for waste batteries and accumulators (e.g. rechargeable batteries) is in place in order to comply with the S.I. No. 283/2014 - European Union (Batteries and Accumulators) Regulations 2014, as amended. In accordance with these regulations, consumers are able to bring their waste batteries to their local civic amenity centre or can return them free of charge to retailers which supply the equivalent type of battery, regardless of whether or not the batteries were purchased at the retail outlet and regardless of whether or not the person depositing the waste battery purchases any product or products from the retail outlet.

The crèche and community space tenants (commercial tenants) cannot use the civic amenity centre. They must segregate their waste batteries and either avail of the take-back service provided by retailers or arrange for recycling / recovery of their waste batteries by a suitably permitted / licenced contractor. Facilities management may arrange collection, depending on the agreement.

Waste Electrical and Electronic Equipment (WEEE)

The WEEE Directive (Directive 2002/96/EC) and associated Waste Management (WEEE) Regulations have been enacted to ensure a high level of recycling of electronic and electrical equipment. In accordance with the regulations, consumers can bring their waste electrical and electronic equipment to their local recycling centre. In addition, consumers can bring back WEEE within 15 days to retailers when they purchase new equipment on a like for like basis. Retailers are also obliged to collect WEEE within 15 days of delivery of a new item, provided the item is disconnected from all mains, does not pose a health and safety risk and is readily available for collection.

As noted above, the tenants cannot use the civic amenity centre. They must segregate their WEEE and either avail of the take-back / collection service provided by retailers or arrange for recycling / recovery of their WEEE by a suitably permitted / licenced contractor. Facilities management may arrange collection, depending on the agreement.

Printer Cartridge / Toners

It is recommended that a printer cartridge / toner bin is provided in the commercial tenants, where appropriate. The tenants will be required to store this waste within their unit and arrange for return to retailers or collection by an authorised waste contractor, as required.

Waste printer cartridge / toners generated by residents can usually be returned to the supplier free of charge or can be brought to a civic amenity centre.

Chemicals

Chemicals (such as solvents, paints, adhesives, resins, detergents, etc) are largely generated from building maintenance works. Such works are usually completed by external contractors who are responsible for the off-site removal and appropriate recovery / recycling / disposal of any waste materials generated.

Any waste cleaning products or waste packaging from cleaning products generated in the commercial tenants that are classed as hazardous (if they arise) will be appropriately stored within the tenants' own space. Facilities management may arrange collection, depending on the agreement.

Any waste cleaning products or waste packaging from cleaning products that are classed as hazardous (if they arise) generated by the residents should be brought to a civic amenity centre.

Light Bulbs

Waste light bulbs (fluorescent, incandescent and LED) may be generated by lighting at the commercial tenants. It is anticipated that tenants will be responsible for the off-site removal and appropriate recovery / disposal of these wastes. Facilities management may arrange collection, depending on the agreement.

Light bulbs generated by residents should be taken to the nearest civic amenity centre for appropriate storage and recovery / disposal.

Textiles

Where possible, waste textiles will be recycled or donated to a charity organisation for reuse. Commercial tenants and residents will be responsible for disposing of waste textiles appropriately.

Waste Cooking Oil

If the commercial tenants use cooking oil, waste cooking oil will need to be stored within the unit on a bunded area or spill pallet and regular collections by a dedicated waste contractor will need to be organized as required. Under sink grease traps will be installed in any cooking space.

If the residents generate waste cooking oil, this can be brought to a civic amenity centre.

Furniture & Other Bulky Waste Items

Furniture and other bulky waste items (such as carpet, etc.) may occasionally be generated by the commercial tenants. The collection of bulky waste will be arranged, as required by the commercial tenants. If residents wish to dispose of furniture, this can be brought a civic amenity centre.

Abandoned Bicycles

Bicycle parking areas are planned for the development. As happens in other developments, residents sometimes abandon faulty or unused bicycles, and it can be difficult to determine their ownership. Abandoned bicycles should be donated to charity if they arise or Facilities management will may arrange collection by a licensed waste contractor.

5.5 Waste Storage Area Design

The shared residential and commercial tenants WSAs will be designed and fitted-out to meet the requirements of relevant design Standards, including:

- ▶ Be fitted with a non-slip floor surface;
- ▶ Provide ventilation to reduce the potential for generation of odours with a recommended 6-10 air changes per hour for a mechanical system for internal WSAs;
- ▶ Provide suitable lighting – a minimum Lux rating of 400 is recommended;
- ▶ Be easily accessible for people with limited mobility;
- ▶ Be restricted to access by nominated personnel only;
- ▶ Be supplied with hot or cold water for disinfection and washing of bins;
- ▶ Be fitted with suitable power supply for power washers;
- ▶ Have a sloped floor to a central foul drain for bins washing run-off;
- ▶ Have appropriate signage placed above and on bins indicating correct use;
- ▶ Have access for potential control of vermin, if required; and
- ▶ Be fitted with CCTV for monitoring.

The facilities management company, crèche tenant, community space and residents will be required to maintain the resident bins and storage areas in good condition as required by the FCC Waste Bye-Laws.

5.6 Facility Management Responsibilities

It shall be the responsibility of the Facilities Management Company to ensure that all domestic waste generated by residents & tenants is managed to ensure correct storage prior to collection by an appropriately permitted waste management company.

Facilities Management will provide the following items:

- ▶ Provision of a Waste Management Plan document, prepared by the Facilities Management Company to all residential units and the tenants, which shall clearly state the methods of source waste segregation, storage, reuse and recycling initiatives that shall apply to the management of the development;
- ▶ Provision and maintenance of appropriate graphical signage to inform residents of their obligation to reduce waste, segregate waste and in the correct bin;
- ▶ Preparation of an annual waste management report for all residential units the commercial tenants;
- ▶ Designation of access routes to common waste storage areas to ensure safe access from the apartment units by mobility impaired persons;
- ▶ Provision of an appropriately qualified and experienced staff member, who will be responsible for all aspects of waste management at the development;
- ▶ Frequent inspection of waste storage areas and signing of a daily check list, which shall be displayed within the area; and
- ▶ Maintenance of a register, detailing the quantities and breakdown of wastes collected from the development and provision of supporting documentation by the waste collector to allow tracking of waste recycling rates.

5.7 Pest Management

A pest control operator will be appointed as required to manage pests onsite during the operational phase of this development. All waste generated within the development will be stored in closed waste receptacles

both within units and within the WSAs. Any waste receptacles will be carefully managed to prevent leaks, odours and pest problems.

All WSAs will have access for potential control of vermin, if required, be supplied with hot or cold water, drainage point and will be regularly inspected by facilities management to deter pests.

6. SUMMARY AND CONCLUSION

In summary, this OWMP presents a waste strategy that addresses all legal requirements, waste policies and best practice guidelines and demonstrates that the required storage areas have been incorporated into the design of the proposed Development.

Implementation of this OWMP will ensure a high level of recycling, reuse and recovery at the development. All recyclable materials will be segregated at source to reduce waste contractor costs and ensure maximum diversion of materials from landfill, thus contributing to the targets set out in *the NWMPCE*.

Adherence to this plan will also ensure that waste management at the development is carried out in accordance with the requirements of the *FCC Waste Bye-Laws*.

The waste strategy presented in this document will provide sufficient storage capacity for the estimated quantity of segregated waste. The designated areas for waste storage will provide sufficient room for the required receptacles in accordance with the details of this strategy.

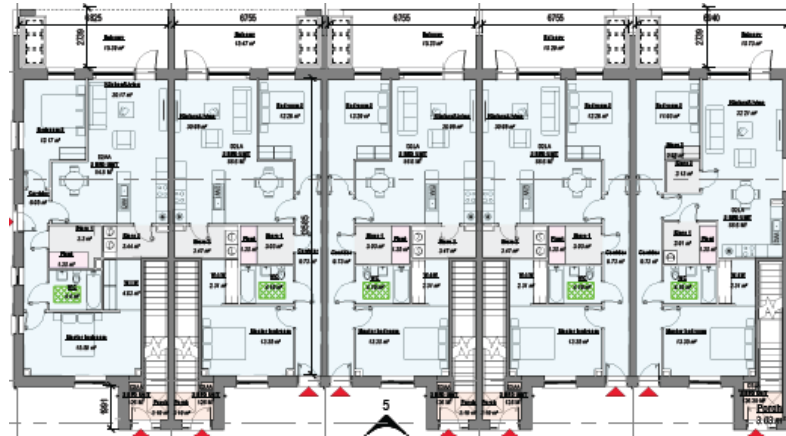
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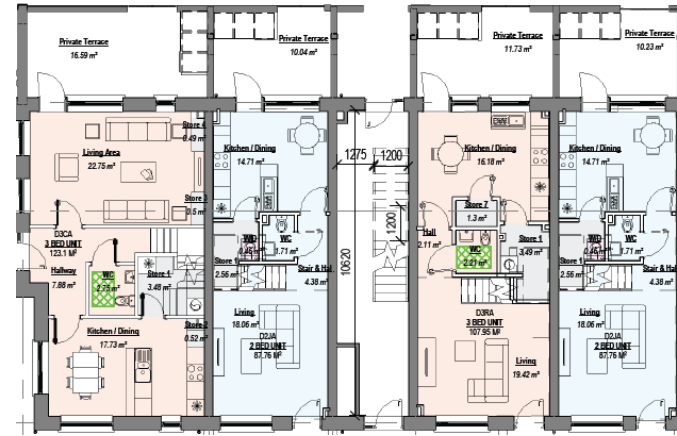


APPENDIX B. DUPLEX BLOCK WASTE STORES

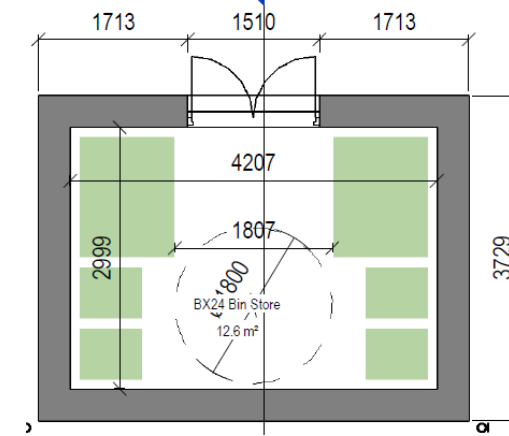
Duplex Block BZ 04



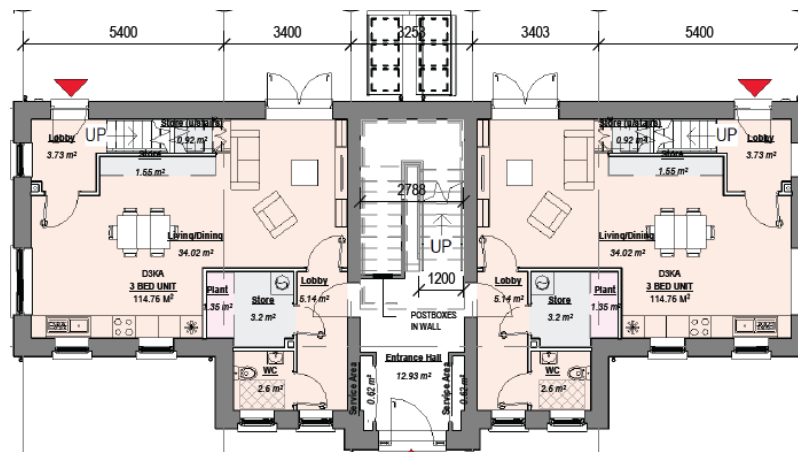
Duplex Block BZ 25 (x2)



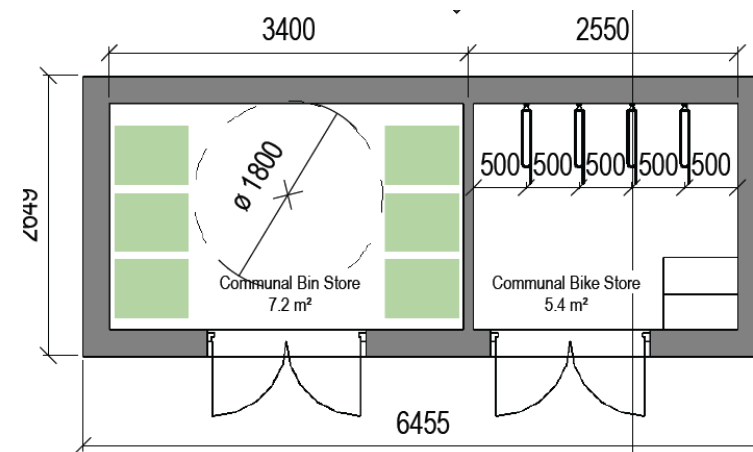
BX 24 – Communal Bin Store



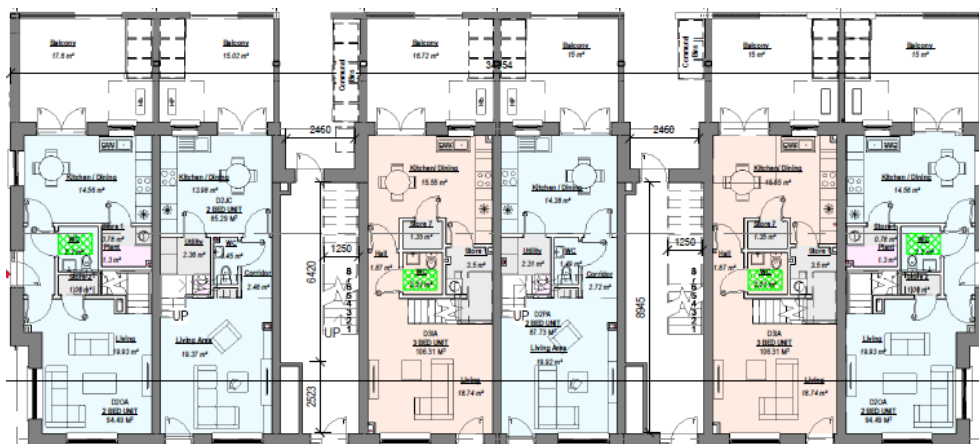
Duplex Block BZ 08



BX 23 – Communal Bin Store



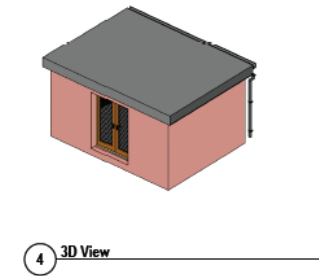
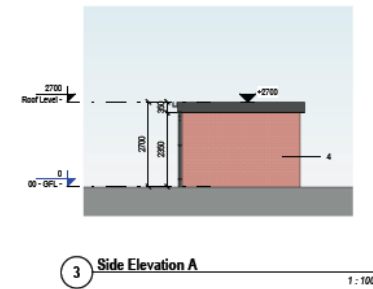
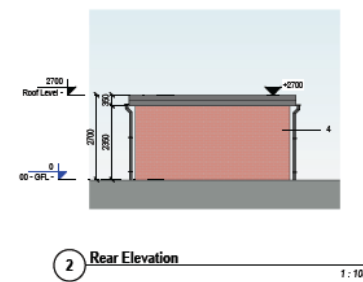
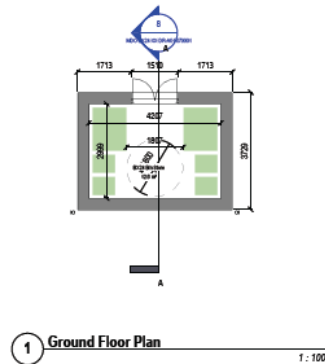
Duplex Block BZ 10



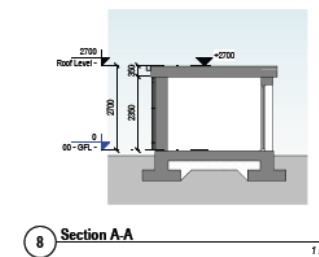
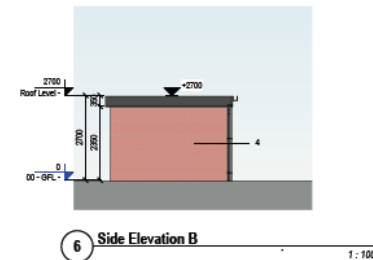
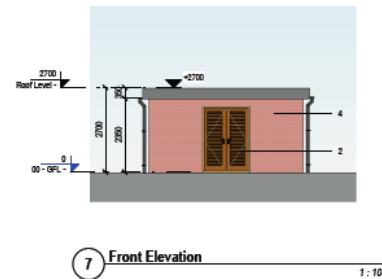
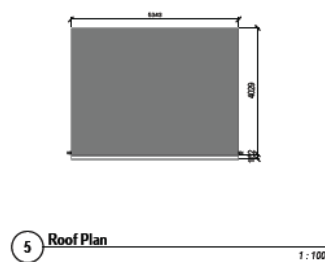
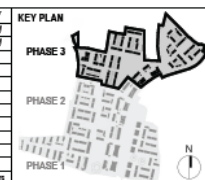
Duplex Block BZ 16



BX 24 – Communal Bin Store



BX24 Room Schedule	
Name	Area
BX24 On Store	12.8 m ²

[illegible]

MATERIALS LEGEND

- MATERIALS LEGEND**
1. Selected Composite Timber Cladding
 2. Composite Timber Doors
 3. Selected Treated Steel Structure
 4. Selected Brick (by neighbourhood)



NOTE:
Spot Heights & Levels relative to Ground Floor Level
See site plans for level to ITMs.



APPROVED BY
Rachael

Client: GLENVEAGH LIVING LIMITED

Project: Ballymstone

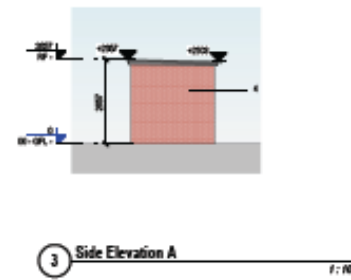
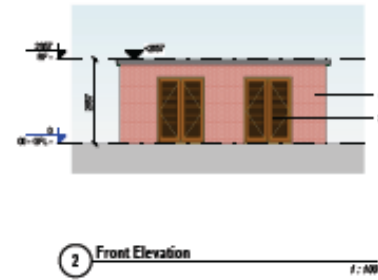
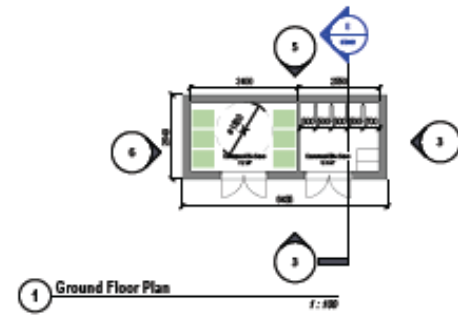
Title: Block BX24 - Bin Store - Plans, Elevations & Section

Sheet No.: **23010-MDO-BX24-XX-DR-A01-070001**

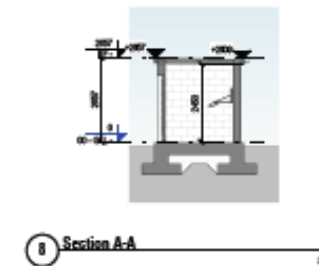
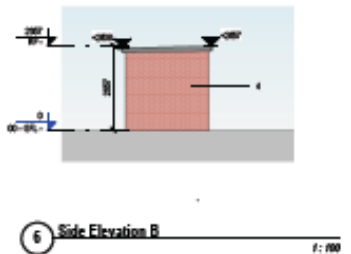
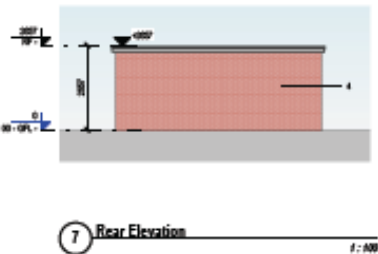
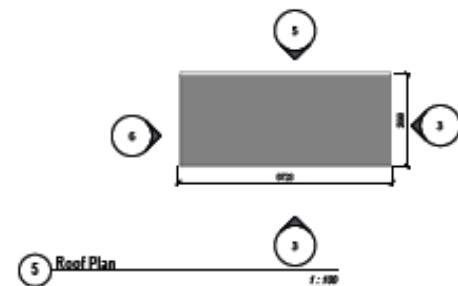
Scale as: As indicated @ A1 Current Rev.: 2 Project No.: 23010



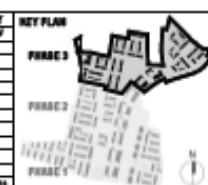
BX 23 – Communal Bin Store



Gross Internal Area	
Room	Area
00 - GFL	10.3 m ²
BX23	10.3 m ²
BX23 Room Schedule	
Room	Area
Communal Bin Store	10.3 m ²
Communal Bin Store	10.3 m ²



REV	DATE	DESCRIPTION	BY
1	20/06/2024	PLANNING - RFI RESPONSE	CW



- MATERIALS LEGEND**
1. Selected Composite Timber Cladding
 2. Composite Timber Doors
 3. Selected Treated Steel Structure
 4. Selected Brick (by neighbourhood)

Spot Levels
Spot Elevation

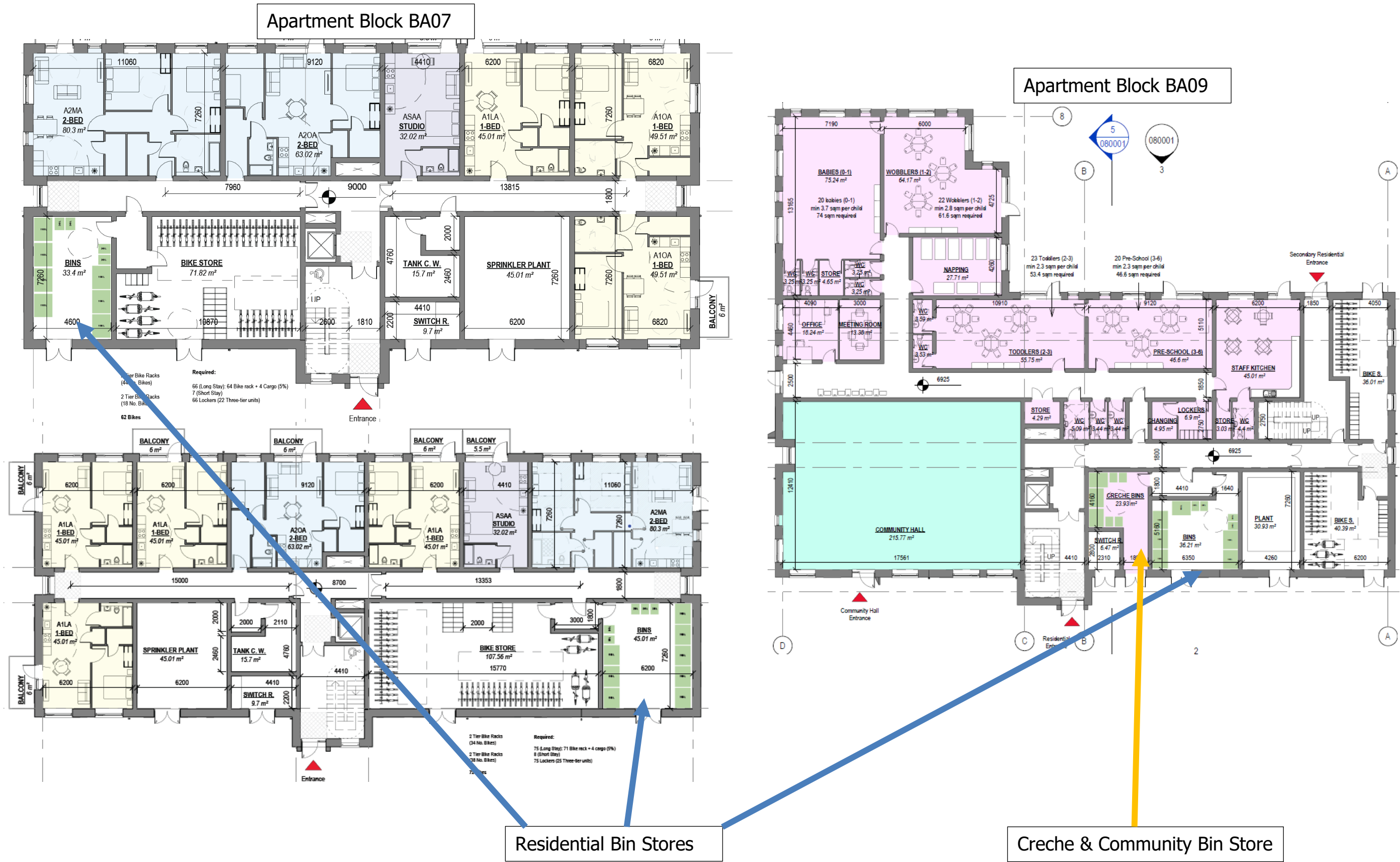
NOTE:
Spot Heights & Levels relative to Ground/Floor Level.
See site plans for level to ITMs.



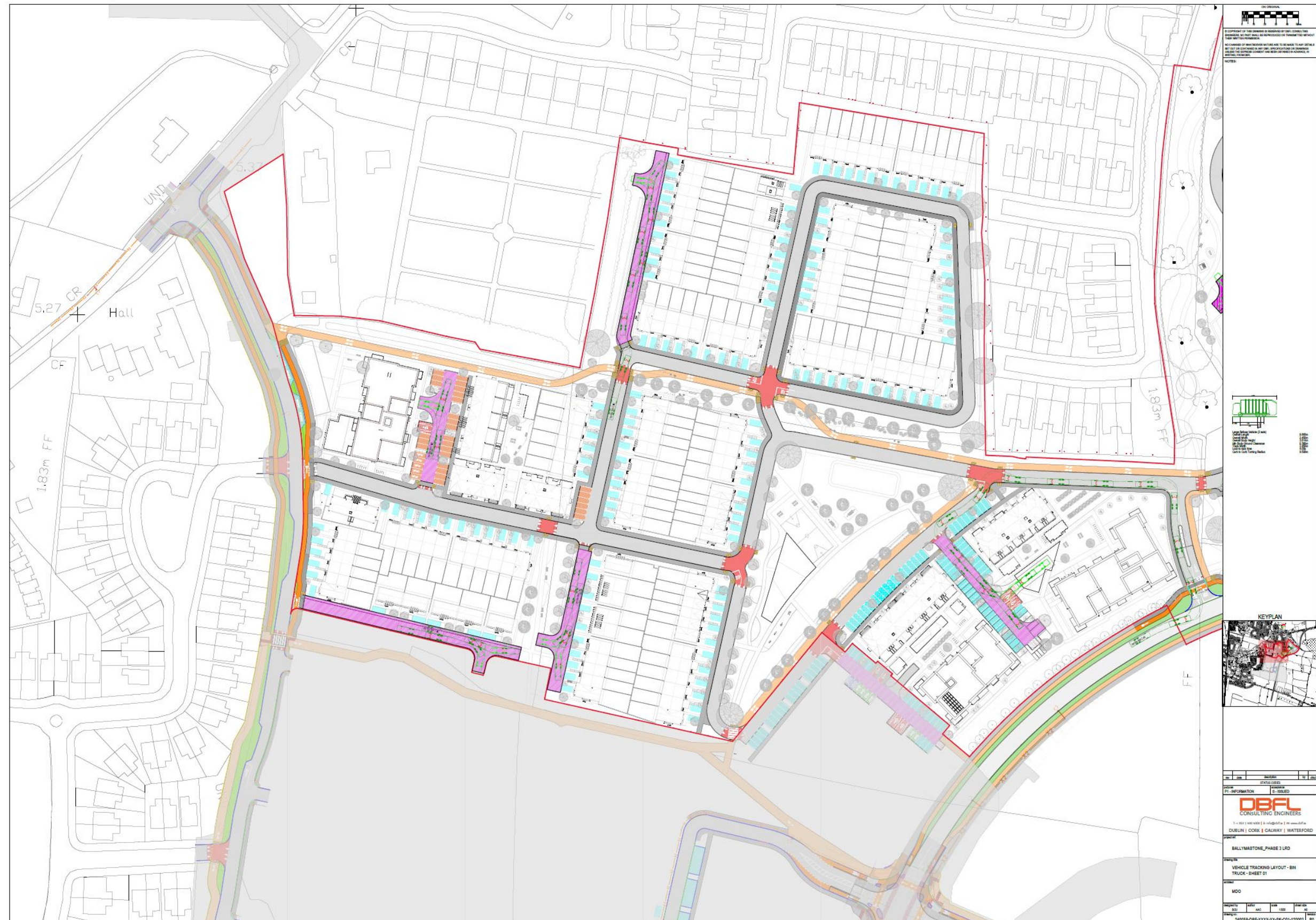
Client:	OLENVEAGH LIVING LIMITED
Project:	RESIDENTIAL DEVELOPMENT, BALLYMESTONE, DONABATE
Title:	Block BX23 - B200 Bin & Bicycle Store - Plans, Elevations & Section
Sheet No.:	23010-070001-MDO-BX23-DR-A01-070001
Scale as:	As indicated @ A1
Current Rev.:	00
Project No.:	23010



APPENDIX C. APARTMENT BLOCK, CRECHE & COMMUNITY WASTE STORES



APPENDIX D. ROAD SWEEP ANALYSIS REFUSE VEHICLE





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