

1. Introduction & Methodology

1.1. The Proposal

Kingsbridge Consultancy Ltd. is seeking permission for the development of 483no. residential units, an access road, creche, 824no. car parking spaces (including 2no. undercroft parking facilities with a combined total of 96no. spaces), 512no. cycle parking spaces, open space / landscaped areas, and all associated ancillary works in a new community on a 17.9ha parcel of lands c.1.3km north of Blackrock Village Centre and c.3km south of the central core of Dundalk. The lands which are the subject of this SHD application to An Bord Pleanála are hereafter referred to as 'the Site', or the 'proposed development'.

The Site location, and red-line boundary are presented in Figure 1.1 and Figure 1.2 respectively. A copy of all planning and engineering drawings submitted in support of this planning application is presented in Appendix A.

The proposed development should be considered in the following context:

- Dundalk is one of the two largest towns in Co. Louth and is a designated Gateway centre with excellent connectivity to Northern Ireland;
- The Blackrock area is within easy commuting distance to both Dublin and Belfast Cities and surrounds; and,
- The lands on which the development is proposed have been partially designated as 'Residential 2' zoning with the remainder designated as 'Recreation, Amenity and Open Space' zoning which has informed the design of the proposed development.

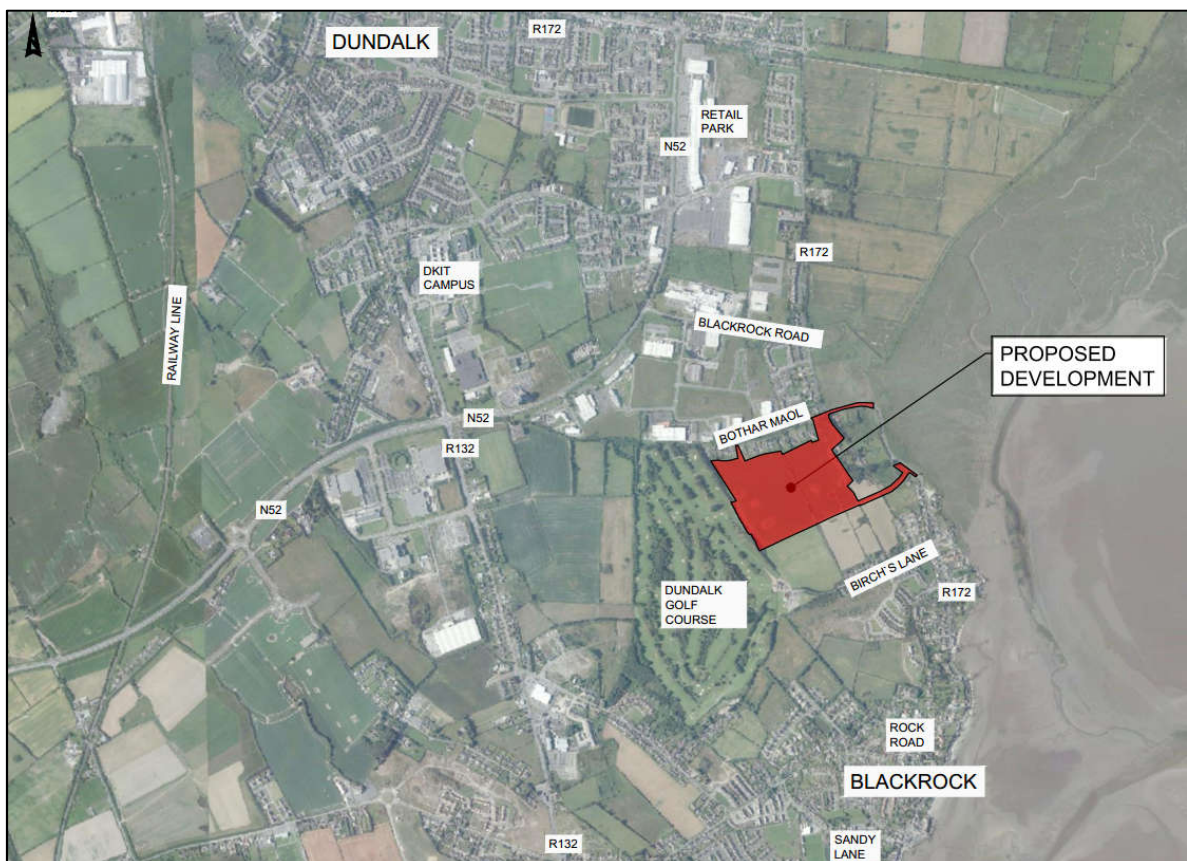


Figure 1.1 - Site Location

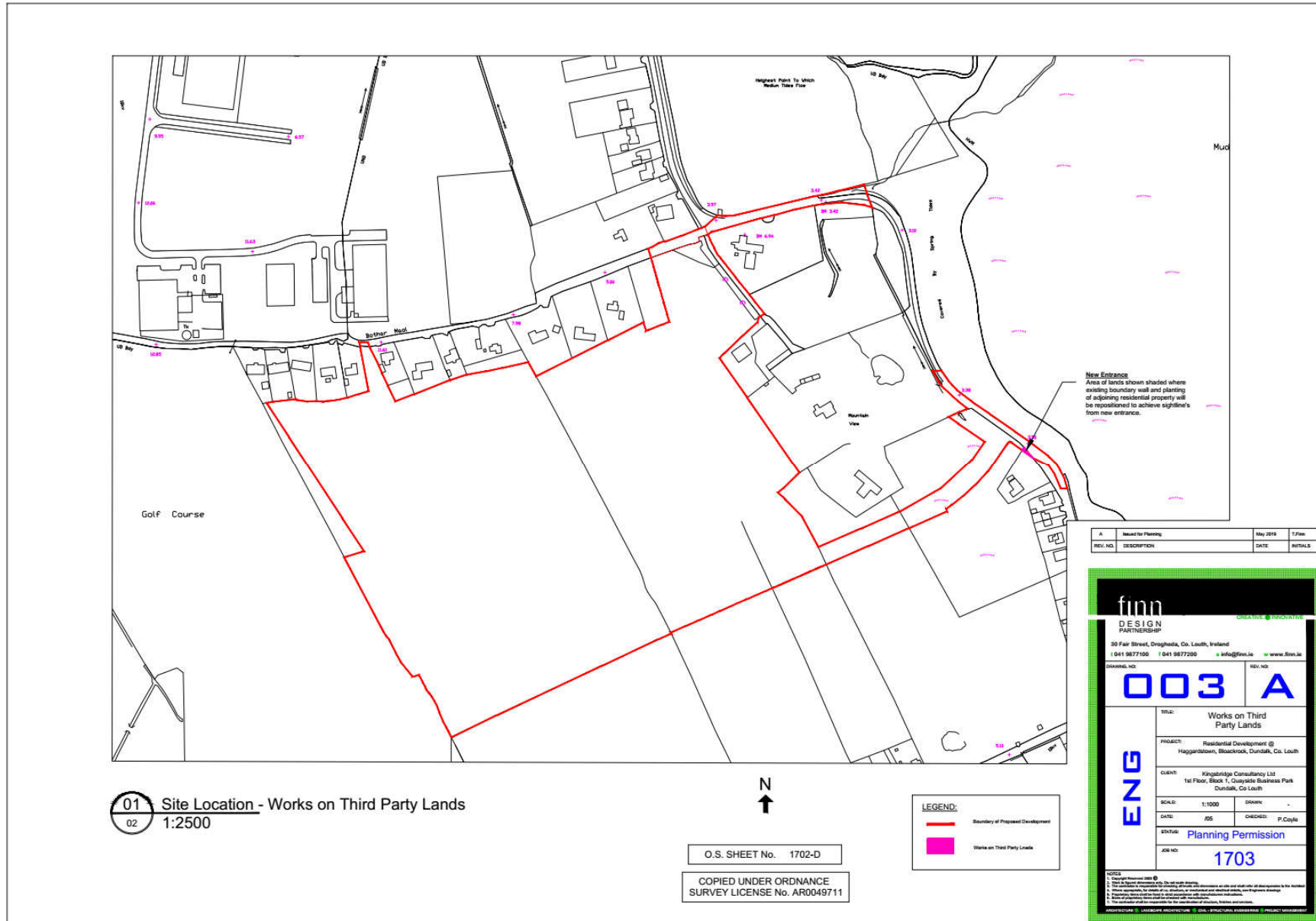


Figure 1.2 - Proposed Development Site (including red-line boundary)

1.2. Strategic Housing Development Regulations 2017

The Planning and Development (Strategic Housing Development) Regulations (S.I. No. 271/2017) came into effect in July 2017. These regulations form part of the Planning and Development Regulations 2001 to 2018, as amended. A Strategic Housing Development (SHD) is defined under Section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016 as follows;

- (a) the development of 100 or more houses on land zoned for residential use or for a mixture of residential and other uses;
- (b) the development of student accommodation units which, when combined, contain 200 or more bed spaces, on land the zoning of which facilitates the provision of student accommodation or a mixture of student accommodation and other uses thereon;
- (c) development that includes developments of the type referred to in paragraph (a) and of the type referred to in paragraph (b), or containing a mix of houses and student accommodation; or,
- (d) the alteration of an existing planning permission granted under section 34 (other than under subsection (3A)) where the proposed alteration relates to development specified in paragraph (a), (b), or (c).

Accordingly, this development is the subject of an SHD planning application to An Bord Pleanála, under Planning and Development (Strategic Housing Development) Regulations S.I. No. 271/2017.

1.3. Need for an EIAR

The proposed development has been screened against the types of development, various processes and activities listed in Schedule 5 Part 2 of the Planning and Development Regulations as amended 2001-2018. In accordance with Section 10(b) an Environmental Impact Assessment Report (EIAR) would be required if the proposed infrastructure consists of the development of more than 500 dwelling units or has an area of more than 20 hectares. The proposed development comprises 483no. residential units on lands with a total Site area of 17.9 hectares; hence does not exceed these relevant thresholds and thus a mandatory EIAR is not warranted.

However, as the proposed infrastructure project is listed under Schedule 5, Part 2 (albeit it does not exceed the relevant stated thresholds) it is considered to be sub-threshold. Part 10, article 92 of the Planning & Development Regulations, 2001, as amended states sub-threshold development means development of a type set out in Part 2 of Schedule 5, which does not equal or exceed, as the case may be, a quantity, area or other limit specified in that Schedule in respect of the relevant class of development. Any sub-threshold developments should be evaluated to determine if the project is likely to have a significant impact on the environment. As the proposed development is located within close proximity to Dundalk Bay, which is a designated Natura 2000 Site (Special Area of Conservation Site Code 000455 / Special Protection Area Site Code 004026), the potential for this sub-threshold project to have a significant impact on the receiving environment warranted further consideration. An EIAR is therefore required in relation to the proposed development.

This EIAR has been prepared in accordance with Planning and Development Regulations as amended 2001-2018, and with due regard to the following EIAR guidance prepared by the Environmental Protection Agency;

- *'Guidelines on the Information to be contained in Environmental Impact Assessment Reports – Draft'* published in 2017;
- *'Revised Guidelines on the Information to be contained in Environmental Impact Statements'* published in 2015; and,
- *'Advice Notes on Current Practice (in the Preparation of Environmental Impact Statements)'* published in 2015.

Cognisance has also been taken of the *'Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment'* published by DoHPLG in August 2018.

1.4. Contributors

This EIAR has been prepared by competent experts. The following table clearly sets out a list of the experts who have contributed to this EIAR, showing which parts of the EIAR they have worked on, their qualifications, experience and any other relevant credentials.

Name	Company	Area of Expertise	Relevant Chapter / Input	Relevant Qualifications / Professional Accreditation	Relevant Experience
Deirdre Larkin	Atkins	Geology, Hydrogeology, Hydrology, Human Health Risk Assessment	Chapter 2 - Project Description Chapter 3 - Population and Human Health Chapter 10 - Water Chapter 12 - Material Assets	BSc. (Hons) Geology (2003) UCC MSc Applied Hydrogeology (2012) University of Newcastle. IGI PGeo No. 223 EurGeol No 1064	14 years
Rejane Nery	O'Mahony Pike (OMP)	Architecture & Urban Design	Chapter 2 – Project Description	B.Arch. & Urban Design MRIAI	19 years
Gareth Grindle	Corvus Environmental Consulting Ltd.	Ecology, Biodiversity	Chapter 4 - Biodiversity	B.Sc. (Hons.) Environmental Science (University of Stirling, 2000) M.Sc. Environmental Change (King's College, London 2001) L.L.M. Environmental Law (Queen's University, Belfast 2014) M.C.I.E.E.M. M.I.Env.Sc.	15 years
Colin Wilson	Atkins	Senior Ecologist	Chapter 4 - Biodiversity	B.Sc. (Hons) Environmental Science (Middlesex University 1992)	14 years
Pete Mullin	Mullin Design Associates	Landscape and Visual	Chapter 5 - Landscape & Visual	BA (Hons) 2:1 Landscape Architecture, Edinburgh College of Art, Heriot-Watt University, Scotland (LI – Part 1-3); (1990- 95) Cert of Professional Practice (LI Part 4) (Chartership- 1998) Stage 1-2 Professional Cert in Postgraduate Teaching (Edinburgh University, Scotland); (2001)	28 years
Avril Challoner	AWN	Air Quality and Climate	Chapter 6 - Air Quality and Climate	BEng (Hons) in Environmental Engineering from the National University of Ireland Galway	6 years Consultancy

				PhD in Environmental Engineering (Air Quality) in Trinity College Dublin Full Member of the Institute of Air Quality Management	
Alistair Maclaurin	AWN	Noise	Chapter 7 – Noise and Vibration	BSc Creative Music and Sound Technology, PgDip Acoustics and Noise Control, Member of the Institute of Acoustics	7 years Acoustics
Chris Fay	Atkins	Traffic and Transportation	Chapter 8 – Traffic	BEng (2006), PGradDip (2010), MIEI	11 years
Kieran Lynch	Atkins	Geology, Geo-environmental investigation.	Chapter 9 - Land, Soils & Geology	BSc. (Hons) Science University of Ulster 1996, MSc Biotechnology University of Ulster 1998 LLB Law Griffith College 2018, Certificate in Waste Management FAS 2000 MCIWM CWEM, CENV CSci	20 years
Aidan O'Connell	Archer Heritage Planning	Architecture, Archaeology and Cultural Heritage	Chapter 11 - Cultural Heritage	BA, MIAI	20 years
John Healy	Digital Dimensions	Architectural Visualisation	Photomontages	Dip Arch Tech, Mac Environmental design of buildings	19 years

1.5. Environmental Scoping

As part of the assessment process, an environmental scoping exercise was carried out. The purpose of the exercise was to define the scope of the EIAR. It was concluded that the construction and operation of the proposed residential development does not pose a risk with regard to potential radiation impacts. Therefore, potential radiation impacts are not considered further within this EIAR. Consultation was undertaken with relevant statutory organisations as part of the assessment process, as detailed further in Section 2.8 below.

1.6. Appropriate Assessment

Natura 2000 Sites, which comprise Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), are a network of Sites designated across Europe in order to protect biodiversity within the EU. SACs are designated under the EU Habitats Directive (92/43/EEC), as transcribed into Irish law by the European Communities (Birds & Natural Habitats) Regulations, 2011 [S.I. 477 of 2011], while SPAs are designated under the EU Birds Directive (79/4089/EEC and amendments as consolidated in 2009/47/EC).

Article 6(3) of the EU Habitats Directive states that: *'Any plan or project not directly connected with or necessary to the management of the [Natura 2000] Site but likely to have a significant effect*

thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the Site in view of the Site's conservation objectives.' Such an assessment is known as an Appropriate Assessment or a Habitats Directive Assessment. Further guidance on this process is provided by the European Commission (2000) and DEHLG (2009).

An Appropriate Assessment Screening was undertaken as part of this application to consider the potential impacts of the proposed development on the conservation interests of surrounding Natura 2000 Sites. As the Site is located within the vicinity of Dundalk Bay Special Area of Conservation (SAC) and Special Protection Area (SPA) the Appropriate Assessment Screening was developed further into a Natura Impact Statement (NIS). Refer to the NIS which accompanies this submission, and is also presented in Appendix B. Based on the findings of the NIS the following conclusions have been made;

'The assessment has demonstrated that the required measures to avoid, mitigate and otherwise reduce the significance of adverse impacts on the integrity of the Natura 2000 Sites are technically feasible and attach a high level of confidence in implementation and success.

Significant adverse impacts on the integrity of the Natura 2000 Sites of Dundalk Bay, in so far as they attach to the development proposals, can be excluded on the basis of precautionary, objective scientific assessment at the second stage (appropriate assessment). The proposed development will not interfere with any key relationships or elements within the environment which define and control the structure and function of any Natura 2000 Sites and will not result in significant adverse impacts on the integrity of the Natura 2000 network or any associated/underlying designations. The development proposals can, subject to appropriate planning conditions, be consented without causing significant adverse effects on the integrity of Dundalk Bay SAC or Dundalk Bay SPA to arise.'

1.7. Structure of this Report

This EIAR includes all necessary technical studies to address the likely environmental impacts of the construction and operation of the proposed residential development. The disciplines identified for inclusion in this EIAR, along with the technical content, were determined based on a Site walkover survey, completion of an environmental scoping exercise (to inform the content and extent of matters covered in the environmental information) and consultation with statutory bodies.

The EIAR is presented in three volumes as follows;

- Volume 1 - Non-Technical Summary;
- Volume 2 - EIAR;
- Volume 3 - EIAR Appendix A to Appendix J.

Within the main body of the EIAR (Volume 2), Chapter 1 sets out the introduction and methodology, while Chapter 2 describes the project and identifies the information required in an EIAR. The environmental topics where there is potential for significant impacts to arise are addressed in Chapters 3 to 12 as follows;

- Chapter 3 Population and Human Health;
- Chapter 4 Biodiversity;
- Chapter 5 Landscape & Visual;
- Chapter 6 Air Quality & Climate;
- Chapter 7 Noise & Vibration
- Chapter 8 Traffic;
- Chapter 9 Land, Soils & Geology;
- Chapter 10 Water;
- Chapter 11 Cultural Heritage; and,
- Chapter 12 Material Assets

Interactions between disciplines are addressed in Chapter 13 and the Schedule of Environmental Commitments are presented in Chapter 14.

Where appropriate, each of the main sections of this report are structured in the same general format, as follows:

- An introduction describing the purpose of the section;
- A description of the methodology used in the section;
- A description of the aspects of the existing environment relevant to the environmental topic under consideration;
- Characteristics of the proposed development under consideration;
- An assessment of the impact of the proposed development on the environmental topic;
- Recommendations for mitigation measures to reduce or eliminate any significant negative impacts identified; and
- An assessment of the residual impact that will remain, assuming that recommended mitigation measures are fully and successfully implemented.

Further details of the methodology and discipline specific best practice and guidance are presented in the relevant Chapters included within this report. Drawings are presented in Appendix A.

Sources of information mentioned in the text are either i) listed in full in the bibliography or ii) are referenced in full in the text.

The full planning application pack, including this EIAR will be available for public viewing from the An Bord Pleanála Office, Louth County Council or the SHD Application Website <http://blackrockdundalk-shd.com>.

1.8. Need for the Project

Kingsbridge Consultancy are seeking a five-year planning permission grant for the development of a Strategic Housing Development in Blackrock, Dundalk, Co. Louth. The lands on which the development is proposed have been partially designated as '*Residential 2*' zoning with the remainder been designated as '*Recreation, Amenity and Open Space*' zoning which has informed the design of the proposed development.

Should permission be granted for the proposed development, a variety of house types will be provided which will provide for families of all ages and needs. Blackrock is in a suitable location for families who want to live in a rural area, whilst also being located within close proximity to the gateway town of Dundalk, and within commuting distance of Dublin and Belfast Cities and their surrounding areas. All of the required educational, healthcare and community services to cater for this wide demographic are located within the immediate vicinity of the proposed development; this coupled with the strong employment and economic prospects in the surrounding area would ensure that the proposed development is an appropriate use of the subject lands zoned '*Residential 2*' and '*Recreation, Amenity and Open Space*'. Furthermore, this type of application (submission via the SHD process) was introduced as part of the Rebuilding Ireland programme implemented in 2015, primarily to accelerate delivery of larger housing and student accommodation proposals in key areas, such as the gateway town of Dundalk. The need for this Project is discussed in greater detail within the planning report submitted as part of this planning application.