Haggardstown LRD

Dundalk, Co. Louth

Main Statement

Volume II

May 2025

McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

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CHAPTER 1

Introduction

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1 Introduction

1.1 Introduction

This Environmental Impact Assessment Report (EIAR) sets out the results of the environmental assessments which have been completed for the proposed Large-scale Residential Development ("**LRD**") on lands (c.18.54 ha) located at Haggardstown and Marshes Upper, Dundalk, Co. Louth, including works on Blackrock Road (R172) and Hardy's Lane (the "**Proposed Development**") to inform the planning consent process.

The assessment has been completed as a statutory environmental assessment. The Environmental Impact Assessment (EIA) process has been completed in line with Directive 2011/92/EU, as amended by Directive 2014/52/EU (together, the EIA Directive), based on the Environmental Protection Agency's (the "**EPA**") Guidelines on the Information to be contained in Environmental Impact Assessment Reports (the **"Guidelines"**).

Environmental Impact Assessment (EIA) is the process of anticipating the effects on the environment caused by a development. The document produced for the proposed development, on behalf of the applicant, as a result is termed the EIAR. Article 1(2)(g) of the EIA Directive states that:

> *"Environment impact assessment" means a process consisting of:*
>
> *(i) The preparation of an environmental impact assessment report by the developer, as referred to in Article 5(1) and (2).*
>
> *(ii) The carrying out of consultations as referred to in Article 6 and, where relevant, Article 7.*
>
> *(iii) The examination by the competent authority of the information presented in the environmental impact assessment report and any supplementary information provided, where necessary, by the developer in accordance with Article 5(3), and any relevant information received through the consultations under Articles 6 and 7.*
>
> *(iv) The reasoned conclusion by the competent authority on the significant effects of the project on the environment, taking into account the results of the examination referred to in point (iii) and, where appropriate, its own supplementary examination; and*
>
> *(v) The integration of the competent authority's reasoned conclusion into any of the decisions referred to in Article 8a."*

The EIAR is a presentation of the potential environmental impacts of the proposed development with a focus on significant impacts.

Chapter 1 introduces the project and describes the scope and methodology of the EIA process. The consultation process which was undertaken is outlined and the competencies of the environmental assessment team are provided.

1.1.1 Expertise and Qualifications

This chapter was prepared by Louise O'Leary, Associate Director at McCutcheon Halley Chartered Planning Consultants. Louise has a Masters in Regional and Urban Planning (BA MRUP Hons), obtained in 2005, and a Diploma in EIA Management, obtained in 2014, both from University College Dublin. Louise is also a Corporate Member of the Irish Planning Institute.

With almost 20 years' experience in consultancy, Louise has directed and contributed to the preparation of environmental impact assessments for a variety of projects including residential, mixed use and infrastructural developments.

1.1.2 Reference to Guidelines Relevant to Discipline

This chapter has been prepared having regard to the following guidelines:

- Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EPA, May 2022).
- Advice Notes on Current Practice in the Preparation of Environmental Impact Statements (EPA, 2003).
- Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report (European Commission, 2017).
- Environmental Impact Assessment of Projects: Guidance on Scoping (European Commission, 2017).
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (Department of Housing, Planning and Local Government,2018).

1.1.3 Brief Project Description

A detailed description of the project is provided in Chapter 2. To summarise, the applicant seeks permission for a Large-scale Residential Development (LRD) comprising 502 no. units and a creche facility. A 7 year Permission is being sought.

An overview of the key development statistics is provided in the Table below with a detailed description of the proposed elements in the following sections.

Table 1-1 Proposed Development – Key Statistics

Site Area (Principal Site)	**17.60 ha**
Full Application Site including public roads for services	18.54 ha
Net Developable Area excluding site entrance road and lands zoned open space	13.24 ha
Gross Floor Area (GFA)	52,011.2 sqm
Total Residential GFA	51,440.5 sqm
Creche GFA (Total Non – Non-Residential)	570.7 sqm
No. Units	502 no. units comprising • 40 no. 1 bed maisonettes • 147 no. 2 bed mid terrace 2 storey houses • 276 no. 3 bed end of terrace and semi-detached 2 storey houses • 1 no. detached bungalow

	• 38 no. 4 bed 3 storey houses	
Unit Mix Summary	Units (No.)	Units (%)
1-bed (maisonette)	40	8.0%
2-bed (mid-terrace)	147	29.3%
3-bed **(end-of-terrace – 134)** **(Semi-detached – 142)** **(detached bungalow- 1)**	277	55.2%
4-bed semi-detached	38	7.5%
Density	37.9 dwellings per hectare (dph)	
Plot Ratio	0.39	
Site Coverage	23.2%	
Building Height	2-3 storeys, with 1 no. single-storey detached unit.	
Car Parking	861 no. spaces comprising: • 817 no. residential spaces • 24 no. visitor spaces • 20 no. creche spaces	
Bicycle Parking	660 no. spaces comprising • 502 no. residential spaces • 120 no. visitor spaces • 22 no. creche spaces • 16 no. bicycle share spaces	
Public Open Space • **Within Principal Site** • **Within Net Developable Area**	 4.67 ha (26.6%) 1.56ha (11.8%)	

Figure 1-1 Site Layout – Overall Site Layout (Extract from JFA Drg. No. P1003)

1.2 Proposed Development Site

The study area comprises the entire application site (refer to Figure 1-1). In general, the study areas are defined individually for each environmental topic, according to guidance and the geographic scope of the potential impacts or of the information required to assess those impacts. Details are provided by each discipline as part of the description of baseline conditions of the site.

1.2.1 Site Description

The site is located at Haggardstown and Marshes Upper, Dundalk, Co. Louth. It is located approximately 4km south of Dundalk and 1km north of Blackrock. The site is located south of Bóthar Maol and west of Blackrock Road (R172). It covers an area of approximately 17.60 ha. This is the principal site. The overall application site measures c. 18.54 ha including Blackrock Road and Tandy's Lane.

The principal site is greenfield and consists of two agricultural fields that are irregular in shape and contains hedgerow, trees, wall and scrub vegetation. The application site also includes lands in public ownership to provide for connections to public infrastructure and proposed works to R172 at the site entrance.

Finnabair Business Park is located to the north of the site, along with existing residential development. To the east, there are existing residential properties, along with the Blackrock Road (R172). There are existing residential properties to the south, while the Dundalk Golf Club is located to the west of the site.

The site is accessed from Bóthar Maol, with road frontage also onto Blackrock Road (R172). The R172 is a regional road with a footpath adjoining the site extending south to Blackrock Village and north to Dundalk.

See the following Figures 1-2 and 1-3 below. .

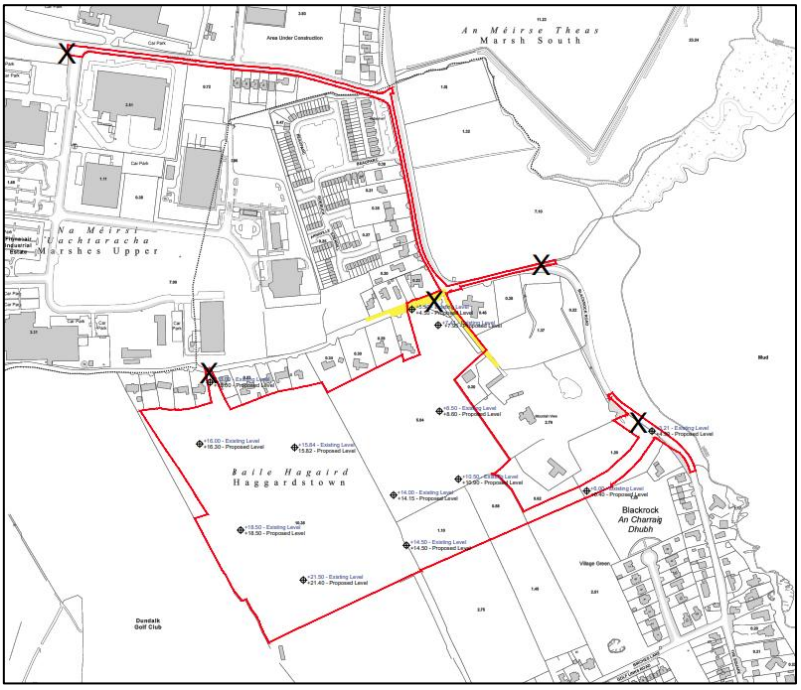

Figure 1-2 Site Location

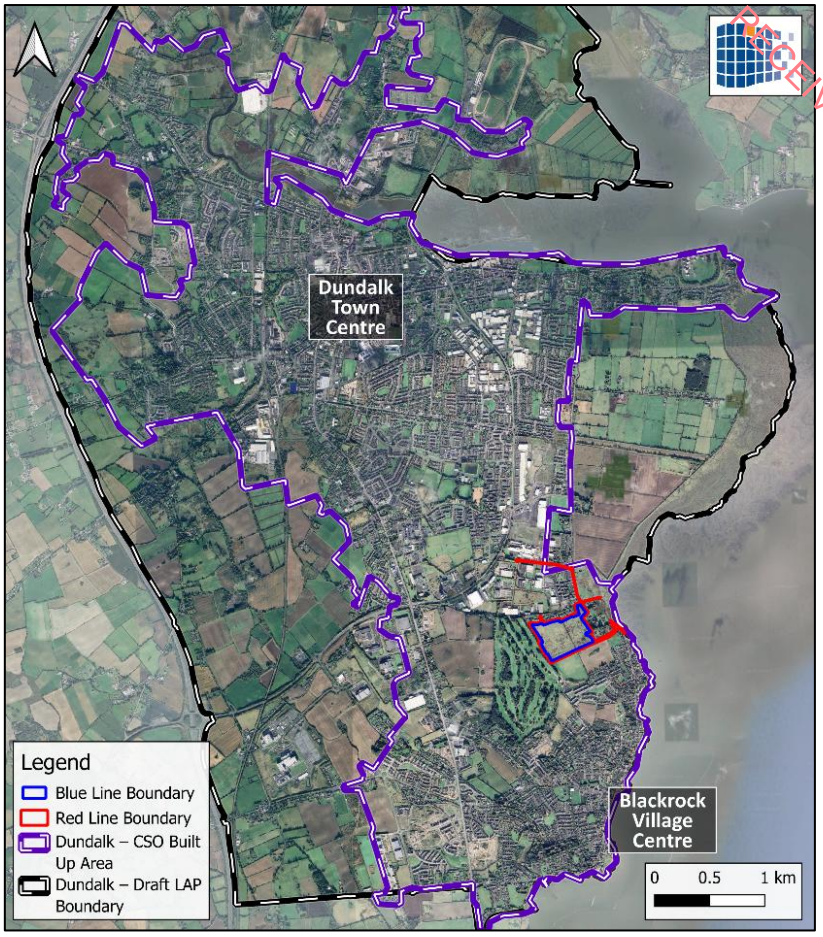

Figure 1-3 Site Context Map (MHP GIS Team)

1.2.2 Land Use Zoning

The majority of the subject lands are zoned A2 – New Residential Phase 1 in the Louth County Development Plan 2021-2027, with the following objective:-

> *"To provide for new residential neighbourhoods and supporting community facilities."*

The proposed crèche facility and all proposed residential units are located within A2-zoned lands, in addition to public open spaces and circulatory roads.

The central portion of the subject lands are zoned H1 – Open Space, with the following objective:-

> *"To preserve, provide and improve recreational amenity and open space."*

The proposed development will deliver a mix of housing typologies in a high-quality well-designed development, served by public and active transport links and local services and facilities.

Section 13.21.6 of the Louth County Development Plan 2021-2027 states:

> *"The density of the development shall be reflective of the location of the lands, with higher densities required on more centrally located areas close to employment or services, or in strategic locations along public transport networks."*

This policy underscores the importance of tailoring housing density to the site's location and connectivity. While higher densities are encouraged in central areas or along key public transport corridors, the LRD is designed with a moderate density that suits its specific location, which is not in a highly central area or directly on a major transport network. Instead, the development optimises land use by providing a balanced mix of housing types that meet local needs while maintaining strong connections to nearby public transport, services, and employment opportunities. This approach ensures the LRD contributes to sustainable growth, fostering an accessible and cohesive community aligned with the Louth County Development Plan's vision.

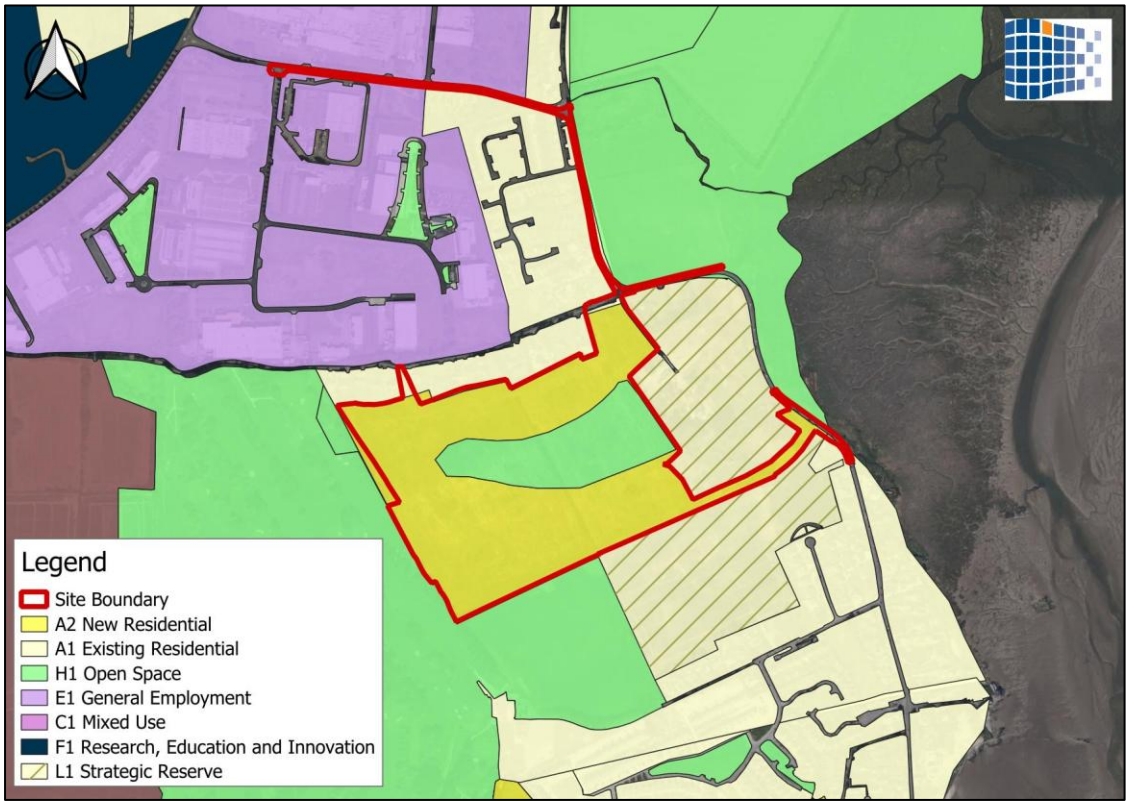

Figure 1-4 Land Use Zoning (Extract from CDP)

1.3 Requirement for EIAR

EIA requirements derive from the EIA Directive, which is transposed into Irish Law by the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (the "2018 Regulations").

Proposed development which falls within one of the categories of development specified in Schedule 5 of the Planning and Development Regulations 2001, as amended (the "2001 Regulations"), which equals or exceeds, a limit, quantity, or threshold prescribed for that class of development must be accompanied by an EIAR.

This EIAR has been prepared in accordance with the aforementioned legislative provisions and the following guidelines, among others, as specified in the various specialist EIAR chapters:

- Department of Housing, Planning and Local Government (DHPLG) (2018). Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment.
- DHPLG (2017). Circular letter PL 1/2017 – Advice on Administrative Provisions in Advance of Transposition.
- European Commission (EC) (1999). Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions.
- EC (2013). Guidance on Integrating Climate Change and Biodiversity into Environmental Impact Assessment.
- EC (2017). Environmental Impact Assessment of Projects. Guidance on Scoping.
- EC (2017). Environmental Impact Assessment of Projects. Guidance on the preparation of Environmental Impact Assessment Report.
- EPA (2022). Guidelines on the information to be contained in Environmental Impact Assessment Reports.

1.4 Purpose of Environmental Impact Assessment

The objective of the EIA Directive (Directive 2011/92/EU), as amended by Directive 2014/52/EU, is to ensure a high level of protection of the environment and human health, through the establishment of minimum requirements for environmental impact assessment (EIA), before development consent being given, of public and private developments that are likely to have significant effects on the environment.

Directive 2014/52/EU, for the first time, provides a definition of EIA and this is now defined by section 171A of the Planning and Development Act, 2000 (the "2000 **Act**") (as inserted by Regulation 16 of the 2018 Regulations).

It is defined as a process consisting of:

a) the preparation of an EIAR by the developer;

b) the carrying out of consultations with the public, prescribed bodies (and, where relevant, any affected Member States);

c) the examination by the competent authority of the EIAR, any supplementary information provided, where necessary, by the developer and relevant information received through the consultation process;

d) the reasoned conclusion of the competent authority on the significant effects of the project on the environment; and

e) the integration of the competent authority's reasoned conclusion into any development consent decision.

The definition of EIA thus provides for a clear distinction between the process of environmental impact assessment to be carried out by the competent authority and the preparation by the developer of an EIAR.

Section 2 of the 2000 Act has been amended to define an EIAR as 'a report of the effects, if any, which proposed development, if carried out, would have on the environment and shall include the information specified in Annex IV of the Environmental Impact Assessment Directive'.

1.5 Content of Environmental Impact Assessment Report

The EIAR entails a systematic analysis and assessment of the potential environmental effects of a proposed development on its receiving environment. Article 3(1) of the EIA Directive prescribes a range of environmental topics that must be addressed in the EIAR, as follows:

> *"The environmental impact assessment shall identify, describe and assess in an appropriate manner, in the light of each individual case, the direct and indirect significant effects of a project on the following factors":*
>
> *a) A description of the likely significant effects of the project on the environment;*
>
> *b) A description of the features of the project and/or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;*
>
> *c) A description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics and an indication of the main reasons for the options chosen, considering the effects of the project on the environment ; and*
>
> *d) A non-technical summary; and,*
>
> *e) Any additional information specified in Annex IV of the Directive/Schedule 6 to the 2001 Regulations, as amended, relevant to the specific characteristics of the project and to the environmental features likely to be affected.*

As is required by Annex IV of the EIA Directive, this EIAR addresses matters including proposed demolition works, risks to human health, major accidents/disasters, biodiversity, climate change and cumulative effects with other existing and/or approved projects.

1.6 Competency

It is a requirement that the EIAR must be prepared by competent experts. For the preparation of this EIAR, the Applicant engaged McCutcheon Halley Chartered Planning Consultants to direct and coordinate the preparation of the EIAR and a team of qualified specialists were engaged to prepare individual chapters, the consultant firms and lead authors are listed in the Table 1.2. Details of competency, qualifications, and experience of the lead author of each discipline is outlined in the individual chapters.

Various environmental specialists were commissioned to complete the specialist chapters of the EIAR, as required by the EIA Directive on the assessment of the effects of certain public and private projects on the environment:

"Experts involved in the preparation of [EIARs] should be qualified and competent. Sufficient expertise, in the relevant field of the project concerned, is required for the purpose of its examination by the competent authorities in order to ensure that the information provided by the developer is complete and of a high level of quality".

1.7 Format and Structure of the EIAR

This EIAR is prepared according to the 'Grouped Format Structure' as described in the EPA's Guidelines on information to be contained in Environmental Impact Statements (EPA, 2022). This means that each topic is considered as a separate section. The advantages of using this format are that it is easy to investigate a single topic and it facilitates easy cross-reference to specialist studies.

The EIAR is sub divided into 3 no. volumes as follows:

- **Volume I** Non-Technical Summary;
- **Volume II** Environmental Impact Assessment Report; and
- **Volume III** Appendices to Environmental Impact Assessment Report.

Volume II is presented as 17 chapters as outlined in Table 1-2.

Table 1-2 EIAR Chapters and Contributors

Chapter	Aspect	Significance	Lead Consultant
1	Introduction	McCutcheon Halley Planning Consultants	Louise O'Leary
2	Project Description		
3	Alternatives		
4	Population & Human Health		
5	Landscape & Visual	Park Hood Landscape Consultants	Andrew Bunbury
6	Material Assets: Traffic & Transport	Systra	Glen Moon
7	Material Assets: Built Services	Donnachadh O Brien & Associates	Alan Lambe
8	Material Assets: Waste	Enviroguide, a DNV Company	Laura Griffin
9	Land & Soils		Gareth Carroll
10	Water & Hydrology		Gareth Carroll
11	Biodiversity		Liam Gaffney
12	Noise & Vibration	Wave Dynamics	James Cousins
13	Air Quality	Enviroguide, a DNV Company	Laura Griffin
14	Climate	AWN	Ciara Nolan
15	Cultural Heritage	IAC Archaeology	Faith Bailey

Chapter	Aspect	Significance	Lead Consultant
16	Interactions of the Foregoing	McCutcheon Halley Planning Consultants	Louise O'Leary
17	Summary of Mitigation Measures		

The full credentials of each design team member, including detailed qualifications, experience, and professional affiliations, can be found in their respective chapters of the EIAR. The following table summarises same.

Table 1-3 EIAR Contributors and Credentials

Lead Consultant	Company	Credentials
Louise O'Leary	McCutcheon Halley Planning Consultants	Masters in Regional and Urban Planning (BA MRUP Hons), Diploma in EIA Management from UCD; almost 20 years of experience; Corporate Member of the Irish Planning Institute
Andrew Bunbury	Park Hood Landscape Consultants	Fully qualified Landscape Architect, over 25 years of experience; Chartered Member of the Landscape Institute (CMLI) UK
Glen Moon	Systra	MA (Hons) TPP; 17 years of experience; Chartered Member of the Chartered Institute of Highways and Transportation
Alan Lambe	Donnachadh O Brien & Associates	Over 15 years of experience; Chartered Engineer and Registered Professional Consulting Engineer (RConsEI) with the Association of Consulting Engineers of Ireland
Laura Griffin	Enviroguide, a DNV Company	Master of Science (Hons) degree in Climate Change and Bachelor of Arts (Hons) degree in English and Geography in Maynooth; 5 years of experience
Gareth Carroll		BA in Mathematics and a BEng in Civil, Structural and Environmental Engineering from Trinity College Dublin; over 12 years of experience; Chartered Environmentalist with the Institute of Environmental Sciences (CEnv)
Liam Gaffney		B.Sc. in Zoology (Hons) and a M.Sc. (Hons) in Wildlife Conservation and Management from University College Dublin; over 5 years of experience; Chartered Institute of Ecology and Environmental Management (CIEEM)
James Cousins	Wave Dynamics	BSc (Hons) in Construction Management and Engineering, Pg Cert in Construction Law and Diploma in Acoustics and Noise Control (Institute of Acoustics) and an IOA Competence Cert in Building Acoustic Measurements; member of Engineers Ireland (MIEI) and the Institute of Acoustics (MIOA) and current SITRI Chairman
Ciara Nolan	AWN	BSc in Energy Systems Engineering and MSc in Applied Environmental Science at University College Dublin; over 8 years of experience; member of Institute of Air Quality Management (MIAQM) and the Institution of Environmental Sciences (MIEnvSc)
Faith Bailey	IAC Archaeology	BA in Archaeology and Masters in Cultural Landscape Management from the University of Wales; over 21 years of experience; member of the Chartered Institute for Archaeologists and the Institute for Archaeologists of Ireland

1.8 Scoping

The purpose of scoping is to identify the information to be contained in an EIAR and the methodology to be used in gathering and assessing that information. The scope of this EIAR is informed by the requirements of the EIA Directive and the transposing Regulations together with the Guidelines set out above. Applicants are not required to seek a formal scoping opinion.

The scope of individual assessments is informed by discipline specific guidelines and, where this is the case, they are referenced in each chapter.

Scoping requires the consideration of the nature and likely scale of the potential environmental impacts likely to arise from a proposed development or project. It is an iterative process that is ongoing throughout the development of the EIAR. The following topics, which include those stipulated in the EIA Directive, have been scoped in for this assessment.

- Population and Human Health
- Biodiversity
- Land and soils
- Water and geology
- Air quality
- Climate
- Noise and vibration
- Landscape
- Cultural heritage
- Traffic and transportation
- Waste
- Built Services and
- Interactions between the above-listed topics.

1.9 Scope of Cumulative Effects

Directive 2014/52/EU substituted a new Annex IV into Directive 2011/92/EU. Annex IV of the EIA Directive is to be read in conjunction with Article 5(1) and sets out the information to be included in an EIAR. Annex IV was transposed into national law via Article 97 of the **2018 Regulations** which substituted a new Schedule 6 into the 2001 Regulations.

The EIA Directive requires that the EIAR describes the cumulation of effects with other existing and/or approved projects.

Cumulative effects may arise from:

"- The interaction between the various impacts within a single project;

- The interaction between all the differing existing and / or approved projects in the same areas as the proposed project." [1]

In August 2018, the Department of Housing, Planning and Local Government issued Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment. The Guidelines summarise "cumulative effects" in the following way at page 40;

> *"Effects are not to be considered in isolation but cumulatively i.e., when they are added to other effects. A single effect on its own may not be significant in terms of impact on the environment but, when considered together with other effects, may have a significant impact on the environment. Also, a single effect which may, on its own, have a significant effect, may have a reduced and insignificant impact when combined with other effects.*

Paragraph 2(e)(i)(V) of Schedule 6 (paragraph 5(e) of Annex IV) provides as follows;

> *"the cumulation of effects with other **existing or approved developments, or both**, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources." (emphasis added).*

Accordingly, each chapter of this EIAR assesses the cumulative effect of permitted developments in combination with the proposed development.

Individually, each specialist consultant has reviewed under construction, permitted, and/or under consideration development in the local area, and using their expertise they have identified projects relevant to their discipline that may interact to produce a cumulative effect. The detail of the identified projects and plans is set out within each specialist chapter of this EIAR.

While the EIA Directive does not require a cumulative assessment of future proposals where a planning application has not been lodged, recognising the broad scope and purpose of the EIA Directive, regard is had to the judgement of *Fitzpatrick v An Bord Pleanála* [2019] IESC 23, henceforth referred to as the 'Apple Case'. The Supreme Court in the Apple Case held that:

1) An EIA must contain an assessment of the cumulative effects of future developments that form an "integral part" of the development applied for (i.e., where there is a "functional or legal interdependence" between the development applied for and the envisaged future development).

A search of the Louth County Council planning register and An Bord Pleanála Case files indicates that there are a number of proposed construction projects in the vicinity of the proposed development which may overlap with this development.

It is possible that other planned projects will be under construction / completed in the area at the same time as the project being considered in this EIAR, including minor urban developments of single

[1] Department of Housing, Planning and Local Government, "Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment" (August 2018), page 40.

houses or extensions or alterations to existing developments. These are not considered material to the assessment of the proposed development.

Table 1-4 Cumulative Projects

Planning Ref	Description	Application Type	Decision	Comments
ABP 303891 and ABP 306503 24/102	142 no. apartments and associated site works	SHD	Permitted. EOD Permitted.	Under Construction. This permission expires 31st December 2026
ABP 303253 23/406	166 no. residential units, creche, completion of street network and link roads and associated site works	SHD	Permitted. EOD Permitted.	Under Construction. This permission expires 30th Sept 2025
25/2	EOD of 304782 – an SHD comprising 483 no. units.	Extension of Duration	Refused 07/03/2025	This is located at the application Site.
ABP 308135	257 no. residential units (163 no. houses, 94 no. apartments), childcare facility and associated site works	SHD	Granted 23/12/2020	Under construction. This permission will expire in Q1 2026.
15/285 ABP 245454 20/981	4 blocks of student housing comprising 21 units, a total of 189 rooms, 127 room nursing home, training centre, parking and ancillary site works.	S34. Application + Extension of Duration	Permitted. EOD Permitted.	Under construction. This permission expires 24th January 2026.
21/1032 ABP 311776	Construction of 29 residential units comprising 24 no. apartments in two blocks, 5 houses.	S.34 Application	Granted 27/04/2023	Under Construction. NIS Included
23/64, ABP 316990	Construction of 183 residential units and associated site works	LRD	Granted 03.05.2023	
2360177	15 no. dwellings	S.34 Application	Granted 06.06.2024	
2360113, ABP 318894	Demolition of dwelling with associated outbuildings for construction of 37 residential units with car parking, vehicular and pedestrian access along with all associated ancillary site works	S.34 Application	Refused by LCC. Appealed. Decision Outstanding.	
22583	Resi development comprising c. 234 dwellings and subsequent amendments	S.34 Application	Granted 17.02.2023	NIS included
22688		S.34 Application	Granted 06.07.2023	
2360257		S.34 Application	Granted 20.09.2023	

Planning Ref	Description	Application Type	Decision	Comments
2460331		S.34 Application	Granted 05.12.2024	
2460512	Neighbourhood centre including retail, medical practice, pharmacy, café, dental and creche	S.34 Application	Granted 10. 04. 2025	
2460649	Resi development comprising 91 units	S.34 Application	FI Requested 06.12.2024	
2460737	Resi development comprising 80 units	S.34 Application	FI Requested 24.01.2025	
2460785	Resi development comprising 85 units	S.34 Application	FI Requested 07.02.2025	
221000, ABP 318174	Demolition of derelict structure and construction of 39 dwellings and all associated site works	S.34 Application	Granted 19.09.2024	NIS
2460033, ABP 321426	Construction of a discount supermarket with off-licence along with all associated site works	S.34 Application	Granted by LCC. Appealed. Decision Outstanding.	NIS
2460037	Permission for the subdivision of ground floor unit 2 into two separated units	S.34 Application	Granted 08.04.2024	
2460114	Permission for A. The construction of a new material storage building (Area=2020m2, Height = 13.57m). B. Extension of yard to the West of the existing building. C. Removal of existing carpark area and replacement of same with construction of new carpark area to the North East and extension of carpark to the South East of Site. D. Alterations to site landscaping. E. All associated site development works	S.34 Application	Granted 19.04.2024	
2460675	Extension to Felda Health and Spa	S.34 Application	Decision to Grant issued 11.04.2025	

Planning Ref	Description	Application Type	Decision	Comments
PT8LH154	Dundalk Active Travel Project along the Dublin Road from Xerox Junction (R132, R215 intersection) heading northwards to Riverside Walk for a length of c.2km	Part 8	Proceed 10.09.2024	
PT8LH116	Inner Relief Road Active Travel Scheme to install high-quality segregated pedestrian and cycling infrastructure to improve safety and promote Active Travel along the R132 Inner Relief Road Dundalk from Xerox Junction (R132, R215 intersection) heading northwards to The Tain Bridge for a length of c.4km		Proceed 10.09.2024	
	Uisce Eireann Coes Road Upgrade works to be completed by Q4 2029 – Q1 2030	Development by Statutory Undertaker		Construction period likely to overlap
	Dundalk and Blackrock Flood Relief Scheme			The project timeline given by the OPW indicates that the planning and development consent stage will run from Q3 2024 to end Q2 2026. Section 9.6.1 of The Dundalk Local Area Plan 2025 – 2031 states – "Whilst the flood defences for this scheme have yet to be finalised, they may include a series of hard defences, including flood embankments and walls, rock armour coastal protection, demountable barriers, road raising, a sluice gate and tanking of two properties, and channel conveyance improvement.".
	Dundalk Active Travel Project – Dublin Road (R132) Dundalk, Xerox Junction to Greengates	Part 8	Consultation Stage.	Consultation on Preliminary Design Proposals in Nov / Dec 2024.

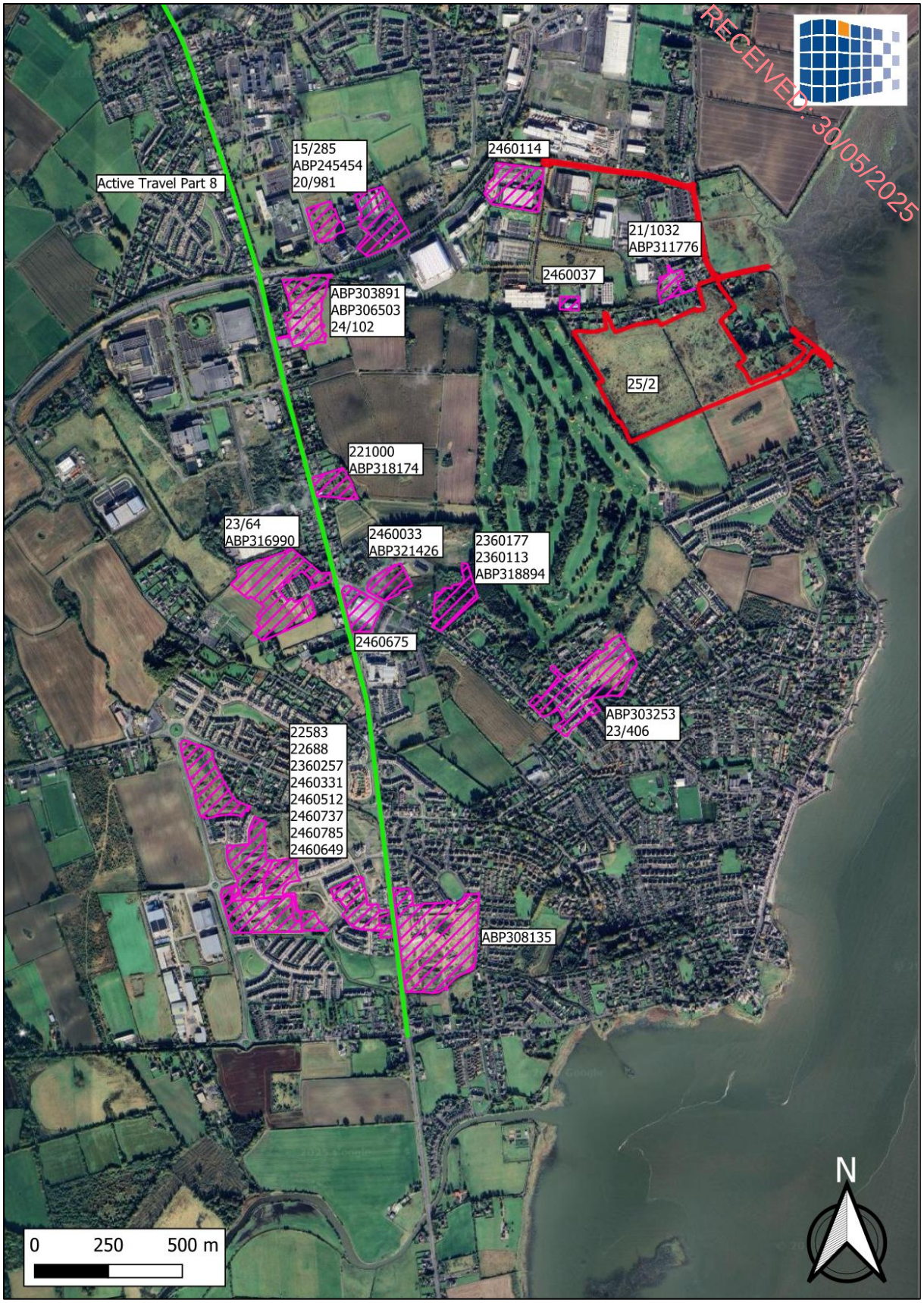

Figure 1-5 Cumulative Projects

Cumulative effects are not limited to projects, and it is necessary to also consider relevant Plans. According to the Environment Protection Agency (2020), in Ireland, key cumulative effects – where environmental receptors are at, or near, their thresholds or their capacity to assimilate more change – include climate change; water quality, flood risk, air quality, biodiversity and landscape.

For the purpose of this EIAR, the following plans have been considered in relation to cumulative impacts:

- **Project Ireland 2040: National Planning Framework First Revision:** the National Planning Framework First Revision, is a key national policy document that establishes a high-level strategic plan for Ireland's future growth and sustainable development. It outlines long-term spatial and economic development objectives, including national strategic outcomes related to population growth, housing, infrastructure, and climate resilience. The cumulative effects of this framework together with the proposed development are considered throughout this EIAR.
- **Regional Spatial and Economic Strategy for the Eastern and Midlands Area, 2019-2031 –** this framework presents a spatial and economic strategy to guide development within the eastern and midlands region. It supports the implementation of national policies, particularly those in the National Planning Framework, by addressing regional priorities such as sustainable land use, economic growth, transportation networks, and environmental management. The cumulative effects of this strategy together with the proposed scheme are considered in the relevant chapters of this EIAR.
- **Louth County Development Plan 2021-2027** - gives spatial expression to the county's economic, social, housing, and cultural development. The Plan has a key role in protecting the environment, heritage, and amenities of the city and in mitigating against the impacts of climate change. It includes policies and objectives for all of the aspects included in this EIAR. Accordingly, each chapter of the EIAR has considered the cumulative effect of the proposed development together with the Development Plan policies and objectives.
- **Dundalk Local Area Plan 2025 – 2031 -** provides detailed planning guidance and policy objectives for the development of the built-up area of Dundalk at a local level. It includes strategies for land use, infrastructure, housing, economic development, and environmental protection, shaping the town's growth in alignment with broader county and regional goals. Similar to the Louth County Development Plan, it addresses a wide range of environmental and developmental aspects relevant to the proposed project. Accordingly, each chapter of the EIAR has considered the cumulative effect of the proposed development together with the policies and objectives of the Dundalk Local Area Plan.
- **The Climate Action Plan, 2025** - Climate change is the ultimate cumulative effect, nationally and internationally. The Climate Action Plan 2025 (CAP25) is the fourth annual update to Ireland's Climate Action Plan. The Plan was approved by Government, subject to Strategic Environmental Assessment and Appropriate Assessment. Thresholds for greenhouse gas emissions are being exceeded. The Plan acknowledges that rapid and significant reductions in greenhouse gas (GHG) emissions are required if we are to meet the 2015 Paris Agreement Goals. The European Green Deal commits to delivering net-zero GHG emissions at EU level by 2050; with Ireland committed to achieving a 51% reduction in emissions from 2021 to 2030,

and to achieving net-zero emissions no later than 2050. The cumulative effects of this Plan together with the proposed project are considered in the following chapters: Population & Human Health, Material Assets: Traffic & Transport and Air Quality and Climate.

- **National Biodiversity Plan** - The Plan sets out actions through which a range of government, civil and private sectors will undertake to achieve Ireland's 'Vision for Biodiversity. It has been developed in line with the EU and International Biodiversity strategies and policies. The cumulative effects of this Plan together with the proposed project is considered in the Biodiversity chapter.

- **Standards in the EU Air Quality Directive and 'daughter' directives** - establish the levels of air pollutants that have no significant impacts on human health or the environment. The cumulative effects of the Directive together with the proposed project is considered in the Population & Human Health Chapter and the Air Quality Chapter.

- **Water Framework Directive & The Draft River Basin Management Plan 2022-2027 –** The EU Water Framework Directive (2000/60/EC) (WFD) requires all Member States to protect and improve water quality in all waters so that we can achieve good ecological status by 2015 or, at the latest, by 2027. It was given legal effect in Ireland by *inter alia* the European Communities (Water Policy) Regulations 2003 (S.I. No. 722 of 2003) (as amended), European Communities Environmental Objectives (Surface Waters) Regulations 2009 (as amended) . It applies to rivers, lakes, groundwater, and transitional coastal waters.

  The River Basin Management Plan sets out the actions that Ireland will take to improve water quality and achieve 'good' ecological status in water bodies by 2027, as per the WFD. The cumulative effect of the Directive and Plan together with the proposed project is considered in the Material Assets: Built Services and Water & Hydrology chapters of this EIAR.
  The transposing legislation that should be referred to is as follows:

  - European Communities (Water Policy) Regulations 2003, as amended
  - European Communities Environmental Objectives (Surface Waters) Regulations 2009, as amended
  - European Communities Environmental Objectives (Ground Waters) Regulations 2010, as amended.

In addition, each of the specialist chapters (4 - 15) considers the cumulative effects of projects and plans relevant to the zone of influence and discipline specific factors.

1.10 Impact Assessment Methodology

Each chapter of this EIAR assesses the direct, indirect, cumulative, and residual impact of the proposed development for both the construction and operational stage of the proposed development.

The impact assessment methodology is detailed in the respect of the various environmental topics in the respective chapters herein. The assessment of impacts is based on the source-pathway-receptor model, which dictates that, for an environmental impact to occur, there must be a source, a receptor which is sensitive to the effect in question, and a pathway by which the effect can reach the receptor.

Unless otherwise stated, the criteria for effect / impact characterisation are as per the EPA Guidelines (as set out in Table 1.5). The significance of an impact is determined through comparison of the character of the predicted effect to the sensitivity of the environment / receptor in question.

Table 1-5 Impact Rating Terminology

Quality of Effect	
Positive	A change which improves the quality of the environment (for example, by increasing species diversity, or the improving the reproductive capacity of an ecosystem, or by removing nuisances or improving amenities).
Neutral	No effects or effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error.
Negative/Adverse Effects	A change which reduces the quality of the environment (for example, lessening species diversity or diminishing the reproductive capacity of an ecosystem; or damaging health or property or by causing nuisance).
Significance of Effect	
Imperceptible	An effect capable of measurement but without significant consequences.
Not Significant	An effect which causes noticeable changes in the character of the environment but without significant consequences
Slight Effect	An effect which causes noticeable changes in the character of the environment without affecting its sensitivities.
Moderate Effect	An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends.
Significant Effect	An effect which, by its character, magnitude, duration, or intensity, alters a sensitive aspect of the environment.
Very Significant Effect	An effect which, by its character, magnitude, duration, or intensity, significantly alters most of a sensitive aspect of the environment.
Profound Effect	An effect which obliterates sensitive characteristics.
Duration of Effects	
Momentary	Effects lasting from seconds to minutes
Brief	Effects lasting less than a day
Temporary	Effects lasting less than a year
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
Reversible	Effects that can be undone, for example through remediation or restoration
Frequency	Describe how often the effect will occur (once, rarely, occasionally, frequently, constantly – or hourly, daily, weekly, monthly, annually).
Extent and Context of Effects	
Extent	Describe the size of the area, the number of sites and the proportion of a population affected by an effect.
Context	Describe whether the extent, duration, or frequency will conform or contrast with established (baseline) conditions (is it the biggest, longest effect ever?).
Probability of Effects	
Likely	The effects that can reasonably be expected to occur because of the planned project if all mitigation measures are properly implemented.

Unlikely	The effects that can reasonably be expected not to occur because of the planned project if all mitigation measures are properly implemented.
Type of Effects	
Indirect (Secondary or Off-site)	Effects on the environment, which are not a direct result of the project, often produced away from the project site or because of a complex pathway.
Cumulative	The addition of many minor or insignificant effects, including effects of other projects, to create larger, more significant effects.
Do-Nothing	The environment as it would be in the future should the subject project not be carried out.
Worst-Case	The effects arising from a project in the case where mitigation measures substantially fail.
Indeterminable	When the full consequences of a change in the environment cannot be described.
Irreversible	When the character, distinctiveness, diversity or reproductive capacity of an environment is permanently lost.
Residual	The degree of environmental change that will occur after the proposed mitigation measures have taken effect.
Synergistic	Where the resultant effect is of greater significance than the sum of its constituents, (e.g. combination of SOx and NOx to produce smog).

1.11 Consultation

A dedicated website for this proposed development is established and the EIAR is available at www.haggardstownlrd2.ie

Additionally, prior to lodging this application, the required information has been issued for the Department of Housing, Planning and Local Government's EIA Portal. The purpose of this tool is to inform the public, in a timely manner, of applications that are accompanied by an EIAR.

An Opinion was received from Louth County Council following the S247 pre-application consultation and LRD Meeting and it contained details of discussions which is attached to Appendix 1 of the Planning Statement, submitted under separate cover by McCutcheon Halley.

Where the respective authors of the assessment chapters engaged / consulted with the Local Authority, Uisce Eireann, utility providers, other prescribed bodies etc., details are provided in the relevant chapter.

Haggardstown LRD

Dundalk, Co. Louth

Main Statement

Volume II

CHAPTER 2

Development Description

May 2025

McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

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2 Development Description

2.1 Introduction

This chapter of the Environmental Impact Assessment Report (EIAR) sets out the proposed development and provides details in relation to the demolition, construction and operational phases of the scheme. The chapter was prepared in conjunction with the relevant member of the Design Team, and it should be read in conjunction with the submitted drawings together with supporting reports.

2.2 Expertise and Qualifications

This chapter was prepared by Louise O'Leary, Associate Director at McCutcheon Halley Chartered Planning Consultants. Louise has a Masters in Regional and Urban Planning (BA MRUP Hons), obtained in 2005, and a Diploma in EIA Management, obtained in 2014, both from University College Dublin. Louise is also a Corporate Member of the Irish Planning Institute.

With almost 20 years' experience in consultancy, Louise has directed and contributed to the preparation of environmental impact assessments for a variety of projects including residential, mixed use and infrastructural developments.

2.3 Proposed Development

A 7 year permission is being sought for a Large-scale Residential Development (LRD) comprising 502 no. units and a creche facility.

In brief, the proposed development will consist of:-

- 502 no. residential units comprising 1, 2, 3 and 4 bed units in a mix of maisonettes, terraced and semi-detached units, with 1 no. detached bungalow unit. The total residential gross floor area is 51,440.5 sqm. The residential units are two and three storey in height, excluding the 1 no. bungalow.
- Two storey Creche facility (570.7 sqm Gross Floor Area) with outdoor secure play area.
- New Access off Blackrock Road (R172)incorporating a new bus stop, with 2 no. pedestrian and cycle access points from Bóthar Maol, and provision for future access to lands to south provided for.
- Infrastructure and services for the proposed development including surface water infrastructure, water mains and wastewater which will be pumped via a new rising main along Blackrock Road and Hardy's Lane to Finnabair Crescent where it will discharge to the existing wastewater drainage network.
- Associated public and private open space, landscaping and amenity areas including a large central park of c.2.7ha with public art, boundary treatments, public lighting, roads, cycleways, footpaths, car and cycle parking, infrastructure and services and all associated site and development works.
- To facilitate the proposed development, excavation, cut and fill, reprofiling of existing ground levels and removal of works completed under previously permitted SHD development including the foundations for 5 no. houses is required. The ruins of a former pumphouse will

also be removed / demolished as part of the works and existing overhead electrical lines will be undergrounded.

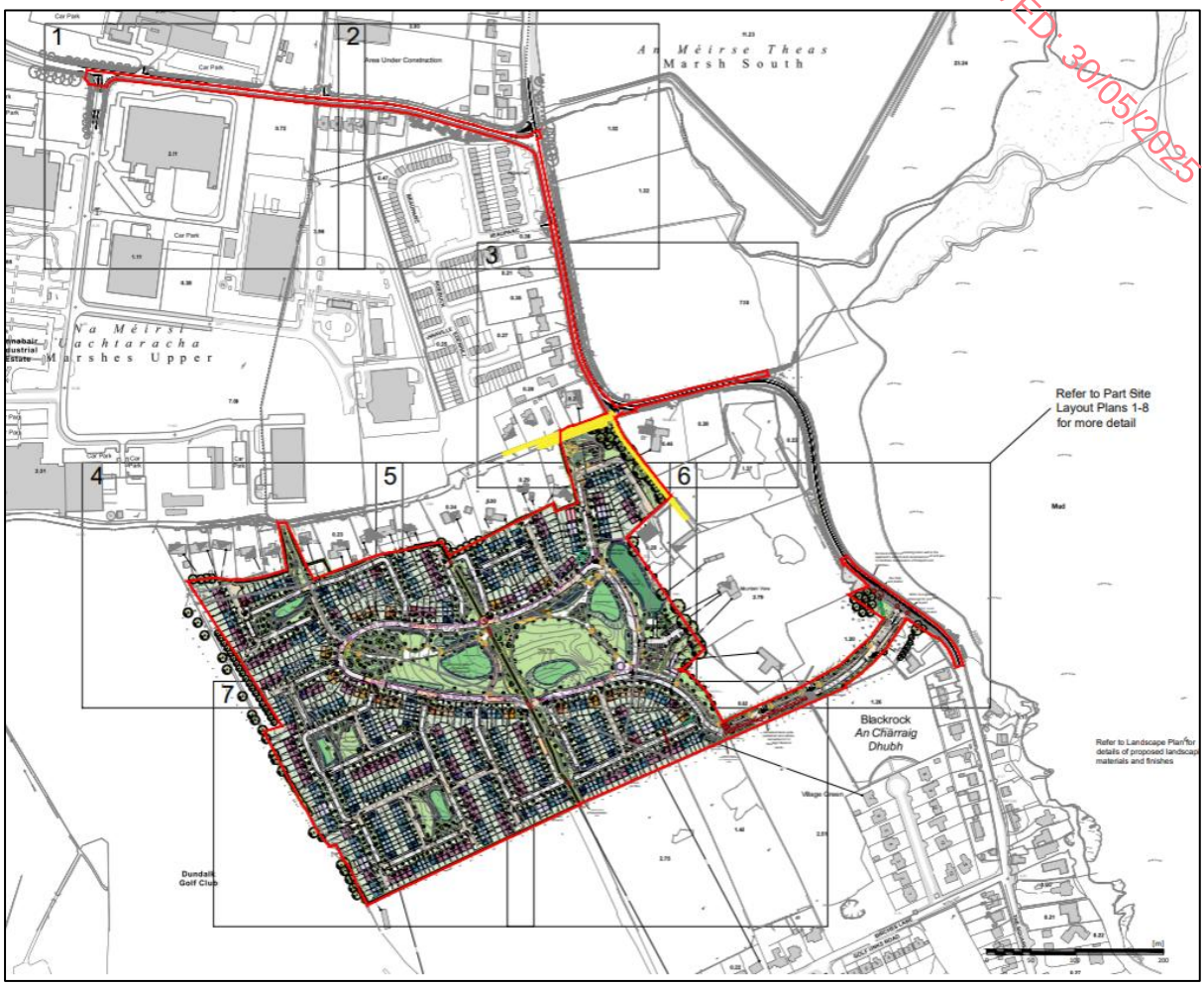

Figure 2-1 Proposed Layout – Overall Site Layout (Extract from JFA, Drawing pack, Drg. No. P1003)

Figure 2-2 Proposed Layout – Principal Site (Extract from JFA, Drawing Pack, Drg. No. P1004)

An overview of the key development statistics is provided in the Table below with a description of the proposed elements in the following sections.

Table 2-1 Proposed Development – Key Statistics

Key statistics		
Site Area (Principal Site)	17.60 ha	
Full Application Site including public roads for services	18.54 ha	
Net Developable Area excluding site entrance road and lands zoned open space	13.24 ha	
Gross Floor Area (GFA)	52,011.2 sqm	
Total Residential GFA	51,440.5 sqm	
Creche GFA (Total Non – Non-Residential)	570.7 sqm	
No. Units	502 no. units comprising • 40 no. 1 bed maisonettes • 147 no. 2 bed mid terrace 2 storey houses • 276 no. 3 bed end of terrace and semi-detached 2 storey houses • 1 no. detached bungalow • 38 no. 4 bed 3 storey houses	
Unit Mix Summary	Units (No.)	Units (%)
1-bed (maisonette)	40	8.0%
2-bed (mid-terrace)	147	29.3%
3-bed (end-of-terrace – 134) (Semi-detached – 142) (detached bungalow- 1)	277	55.2%
4-bed semi-detached	38	7.5%
Density	37.9 dwellings per hectare (dph)	

Key statistics	
Plot Ratio	0.39
Site Coverage	23.2%
Building Height	2-3 storeys, with 1 no. single-storey detached unit.
Car Parking	861 no. spaces comprising: • 817 no. residential spaces • 24 no. visitor spaces • 20 no. creche spaces
Bicycle Parking	660 no. spaces comprising • 502 no. residential spaces • 120 no. visitor spaces • 22 no. creche spaces • 16 no. bicycle share spaces
Public Open Space • **Within Principal Site** • **Within Net Developable Area**	 4.67 ha (26.6%) 1.56ha (11.8%)

2.3.1 Existing Structures

There are no existing dwellings on site.

At the north east corner, there are the ruins / structure of an old pump house within the overgrown area. This will be removed as part of the proposed LRD development. There is also an existing container on site which will be removed.

Figure 2-3 Existing ruins/structures on site

In December 2024, work commenced on site on foot of a previous SHD permission – ABP Ref. 304782. Construction access / haul routes were formed and strip foundations were dug in the south east, with the foundations poured for 5 no. dwellings.

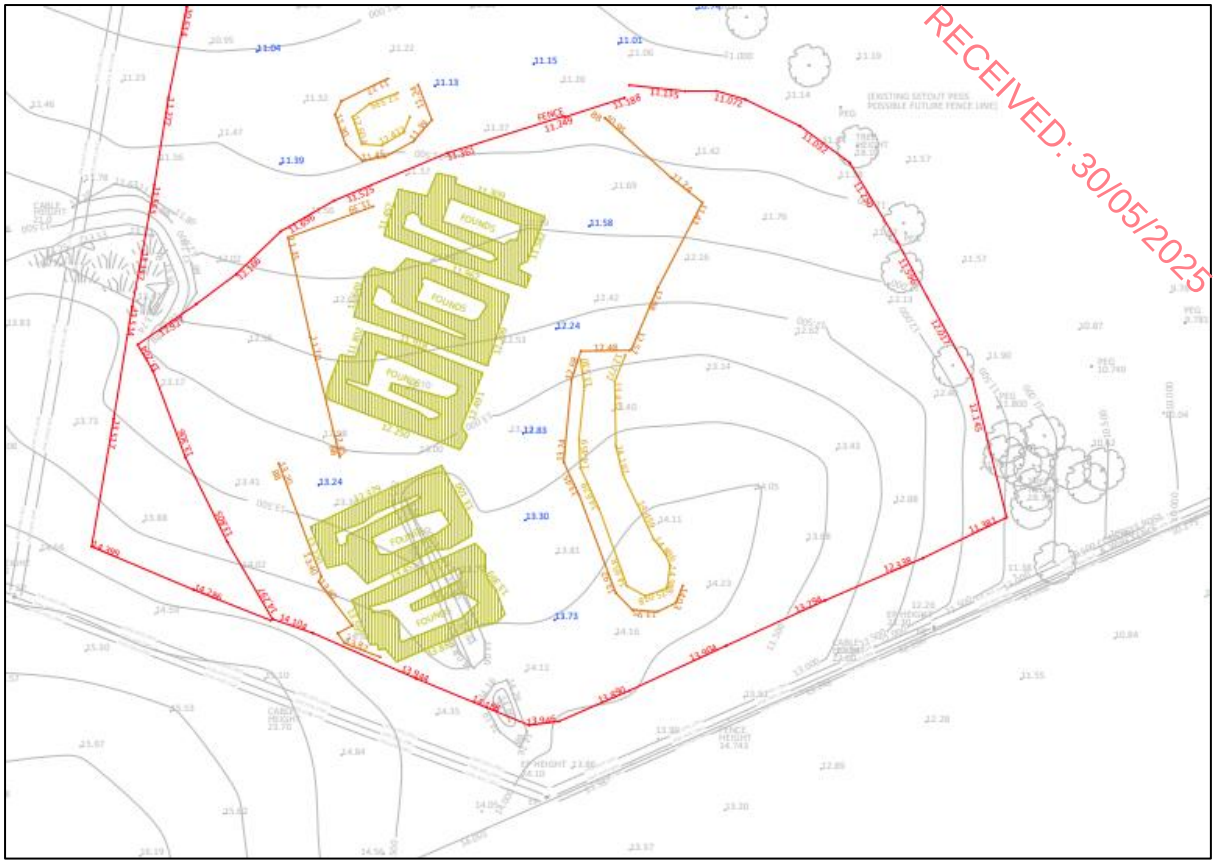

Figure 2-4 Existing Foundations at South East corner of Principal Site area (Extract from Topo Survey)

2.3.2 Design Approach

JFA Architects have designed the proposed housing scheme and the following should be read in conjunction with their drawings and the *Architectural Design Statement* submitted with the application documentation.

The design approach, arrived at in consultation with the Design Team and the environmental consultants, is based upon policy, site analysis and surrounding context. One of the principal drivers to the layout is the residential and open space zonings as per the Louth County Development Plan 2021-2027, with the shape of the open space zoned lands directing the organic layout of the development.

The initial design concept focused on a grid, informed by the existing hedgerow patterns, to ensure an efficient use of the land. In addition to providing a highly efficient layout, this design maximises the retention of the existing hedgerows and trees. The retained central hedgerow will be augmented to provide a biodiversity corridor through the site.

The large, organically shaped central public open space was created by the existing H1 Open Space land use zoning policy set out in the County Development Plan. The strong geometric organisation provides a permeable and legible layout, providing accessibility to the central open space for as many households as possible.

In contrast to the main public open space (identified as Loaker's Park), a series of smaller green public squares have also been set out to provide variety and to further increase the accessibility of public open space for residents.

A cycle route runs through the central open space, connecting households throughout the site onto Bóthar Maol and the Blackrock Road. This route has the potential for a future link southwards towards Birches Lane and Blackrock, and north where Bothar Maol is opened to the West as a greenway.

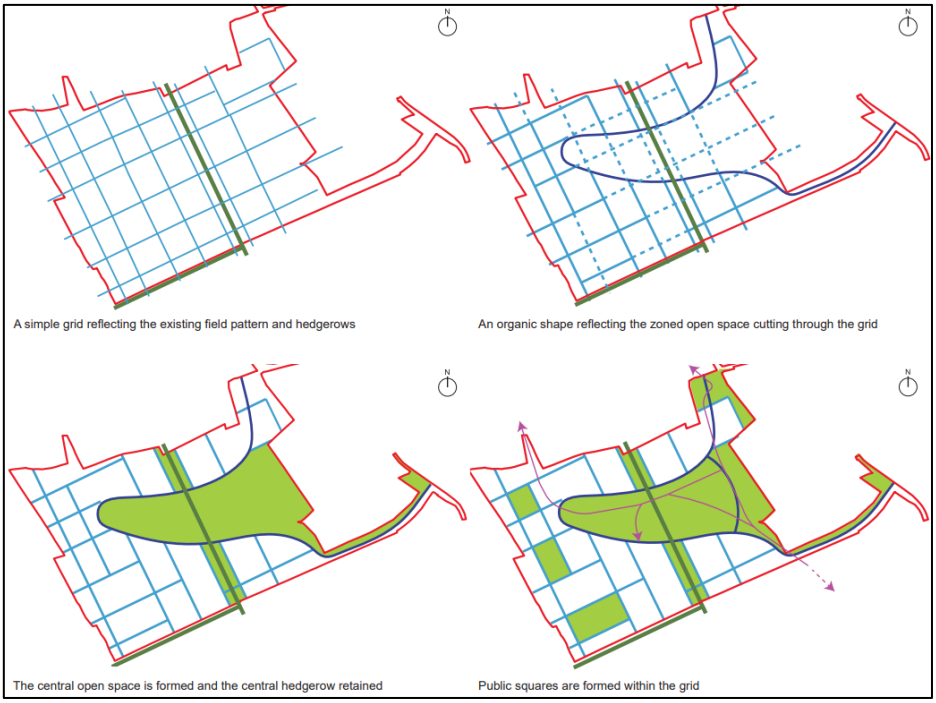

Figure 2-5 Design Strategy Evolution (Extract form JFA, *Architectural Design Statement*)

2.3.3 Site Layout and Placemaking

This section should be read in conjunction with the *Architectural Design Statement* by JFA included with this Application and in particular Section 5 – Placemaking.

The proposed layout has been designed to function as a sustainable and successful residential neighbourhood, with units fronting the central open space and the neighbourhood parks.

This area of open space is a focal feature of the development, including a network of pedestrian and cyclist routes through it. Circulation follows the permitter of the open space, with the street network comprising of circulatory routes and cul de sacs off the primary access route looping around the central space.

The dwellings have all been designed and sited to take advantage of natural light and heat. The network of streets provides legibility but also reduces the number of north facing rear gardens

The creche is located near the main entrance to the housing estate, with a secure outdoor play area provided. Car and cycle parking for staff and users is provided.

The site is accessed from the east, off the Blackrock Road (R172). There are two additional access points to the site from Bóthar Maol which will be utilised for pedestrian / cycle entry points. The main access also provides for future access to adjacent lands.

Figure 2-6 Proposed Site Layout (Extract from JFA, *Architectural Design Statement*)

The principal site has been divided into six character areas, each set around key elements of the proposed layout, informed by the context of the site. The materiality and landscape design of each character area has been considered to give each area a distinct feel. This enhances public realm and forms the distinct sense of place.

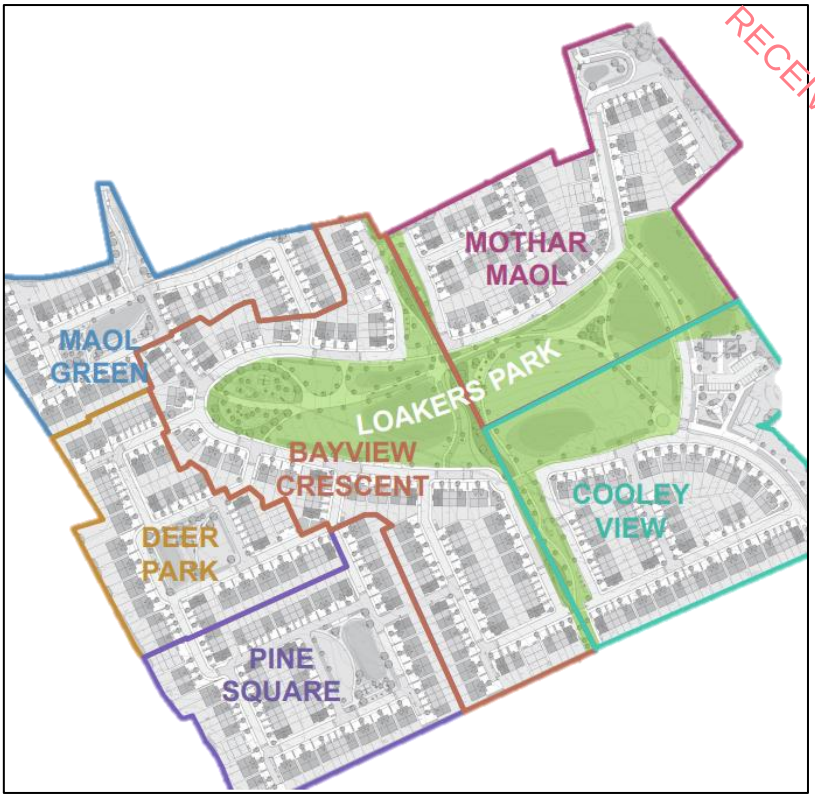

Figure 2-7 Character Areas (Extract from JFA, *Architectural Design Statement*)

Cooley View, located at the main entrance of the proposed development, provides views of the Cooley Mountains to the northeast, and includes wayfinding interventions to guide visitors to the focal art piece located in the corner of the central Loakers Park.

Bayview Crescent is focused along the west of the proposed biodiversity corridor along the existing central hedgerow, which forms a natural break between adjacent character areas. The topography rises towards the centre of the crescent affording views of Dundalk Bay.

Pine Square is centred on a green square to the southwest of the site. The character area is defined by the stand of tall pine trees lying on the site boundary.

Deer Park is centred on a green square to the west of the site, and slopes down toward the western boundary of the site, providing views into the neighbouring Dundalk Golf Club, with the name linking to the previous location of the Golf Club at Deer Park on the Carrickmacross Road.

Maol Green is centred on a green square to the northwest of the site. This character area is defined by the proposed pedestrian and cycle route which will link the public open space to Bóthar Maol.

Mothar Maol is located in the northeast of the site and is defined by a cluster of mature trees (*"mothar"*, in Irish), some of which may be up to 200 years old. This character area slopes down towards Bóthar Maol, with a winding pedestrian and cycle path connection. The sunken path will be edged by a 1-1.5m 'Louth wall' detailing.

Figure 2-8 Cross Section of a 'Louth Wall' (Extract from Park Hood Drawing Pack, *Drg. No. L2107*, Park Hood)

2.3.4 House Design, Units and Mix

This section should be read in conjunction with the *Architectural Design Statement* prepared by JFA which accompanies this application and, in particular, Section 4.

The total number and mix of units are set out in the table below.

The proposed development provides for a variety of types of homes. Overall, the mix comprises 40 no. 1-bed maisonette (apartment) units; 147 no. 2-bed units, 277 no. 3-bed units and 38 no. 4-bed units.

The proposed mix includes c.37% 1 and 2 bed units; c.55% 3-bed units; with the remaining 7.5% comprising of 4-bed units. These are provided in a range of maisonettes, detached, semi-detached and terraced houses, 2 – 3 storey in height excluding 1 no. bungalow. The various house types are dispersed throughout the scheme ensuring varied streetscapes and a diversity of users throughout.

Table 2-2 Unit Mix – 502 No. Units

Unit Mix	Gross Floor Area per Unit (sqm)	Total No. Units Proposed				
		1-bed	2-bed	3-bed	4-bed	
1-bed maisonette	56.5 - 64.8	40				8%
2-bed mid-terrace	86.8		147			29.3%
3-bed end-of-terrace	103.3 -120.4			134		55.2%
3-bed semi-detached	111.0			142		
3-bed detached	111.5			1		
4-bed semi-detached	168.0				38	7.5%
All Unit Types	–	40	147	277	38	

The variety of dwelling types proposed will allow households to move within the development, as may be required by changing needs. House Type X and Maisonette Type A1 are single-storey ground level access dwellings. There are 21 no. of these units in total, accounting for 4.2% of all units proposed.

The 7 principles of Universal Design have been employed across the entire site. All units have been designed to be accessible at ground floor level, with the first floor maisonettes designed to be ground floor accessible with the stairs design ensuring access for persons with reduced mobility is achievable.

All House Types have the potential to be extended to the rear. Further, House Type C ((131 no. 3-bed semi-detached units), House Type X (1 no. 3 bed bungalow unit) and all maisonette units (40 no. units) are designed to be adaptable to meet the needs of residents through different stages of their life. These units have been designed with reference to 'Building for Everyone: A Universal Design Approach' and comprise 34.3% of all proposed units.

2.3.5 Materiality

Section 6 of the *Architectural Design Statement* by JFA Architects includes details on the materiality of the proposed development.

Good quality, durable materials are proposed throughout, with a co-ordinated palette of materials for across the six character areas, including a mix of brick (buff or red in colour) and light render finish with dark grey fenestration and doors and grey roof tiles.

2.3.6 Open Space, Landscaping and Boundary Treatments

The following section should be read in conjunction with the landscape drawings and *Landscape Design Statement* prepared by Park Hood which accompanies this application.

Figure 2-9 Overall Landscape Proposals (Extract from Park Hood Drawing Pack, *Drg. No. L-2100*, Park Hood)

2.3.6.1 Public Open Space

The landscape proposals comprise high-quality areas of public open space which will cater to the community with a range of social activities seating, exercise, interactions and play. The landscape plan follows the distinctive character areas proposed, creating a strong sense of place and identity for each neighbourhood and enhancing the placemaking strategy.

The neighbourhoods reference the local character and history of area and will have subtle differences through materiality of the Architecture, paving and tree planting. Native tree and shrub planting is included, providing an aesthetically pleasing environment and sense of place.

There are various public open spaces, varying in size and function and including:-

- Central parkland space at A, B and part of C– see more details below
- 3 local urban squares at F, G and H,
- biodiversity corridor at E and J,
- spill out spaces for the crèche at C and D and
- pedestrian and cycle connections onto Bóthar Maol at I and K.

Figure 2-10 Public Open Spaces (Extract from JFA, *Architectural Design Statement*)

The provision of public open space equates to 4.67ha (26.6%) of the principal site. When the public open space lands which are zoned Open Space in the CDP are excluded, the provision of public open space (within the net developable site area) is 1.56ha (11.8)%. On its own, this is greater than the 10% minimum requirement of the *Sustainable Residential Development and Compact Settlements Guidelines 2024*.

2.3.6.2 Loakers Park

The focal point of the strategy is the open space zoned lands in the centre of the site, generally comprising the proposed central open space and referred to as 'Loakers Park'.

This park, measuring c2.7ha, includes passive and active spaces as well as equipped play areas and kick about grass areas. An existing hedgerow cutting through the middle of the site, in a north south direction is being maintained and incorporated into the landscape masterplan.

Figure 2-11 Loakers Park (Extract from Park Hood, *Landscape Design Statement*)

The remainder of the Open Space zoned lands (total area c3.7ha) includes Public Open Space (POS) Area B, access roads / pathways, creche carpark and wastewater infrastructure (Refer to previous Figure above).

2.3.6.3 Retention of hedgerows and boundaries

Where possible, existing hedgerows and boundaries of value are being retained and incorporated into the landscaping. This includes the area of wet woodland at the new entrance off Blackrock Road, behind the proposed bus stop.

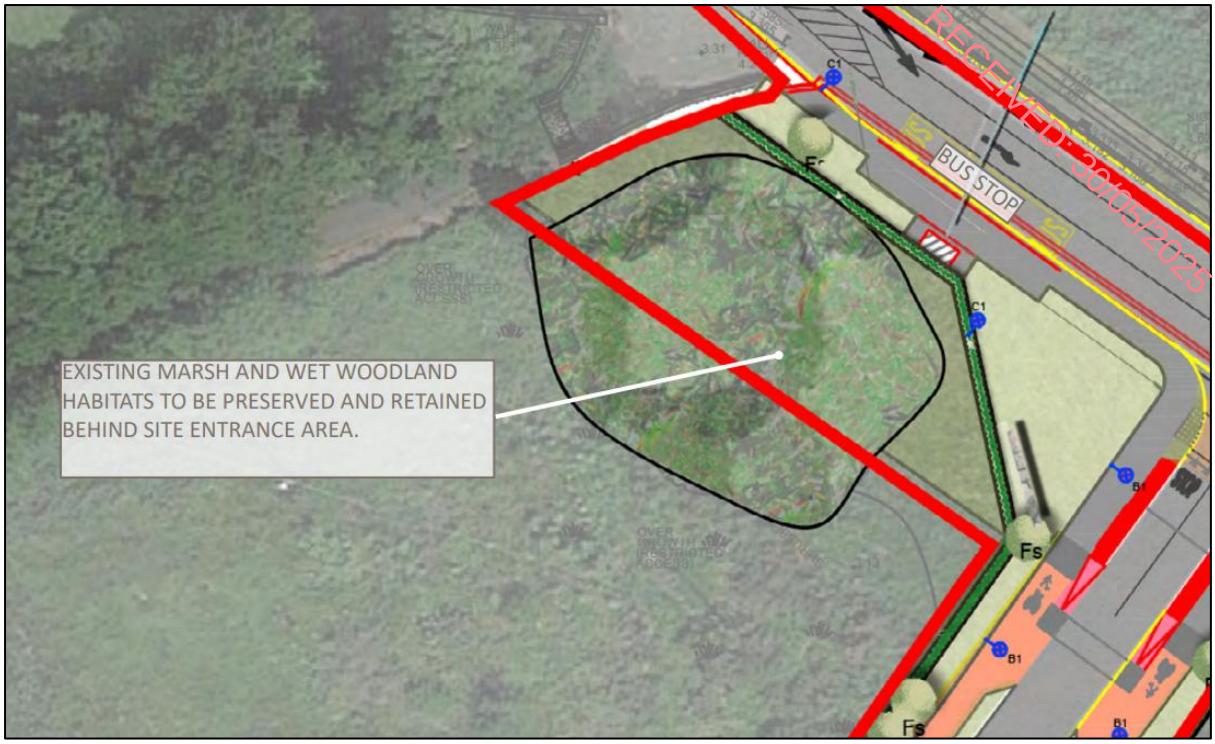

Figure 2-12 Wet Woodland being retained (Extract from Park Hood, Drawing Pack, Drg. No. L2106 by Park Hood)

2.3.6.4 Passive Surveillance

There is passive surveillance of the public realm across the principal site. Public open spaces have active street frontages on all sides to ensure public safety. This also provides the benefit of having public open space immediately adjacent to the greatest number of homes. Children's play areas have been strategically located where there is a greater level of passive surveillance.

2.3.6.5 Private Open Space

All dwellings are dual aspect with usable private rear gardens sized to meet or exceed the standards set in *Sustainable Residential Development and Compact Settlements Guidelines 2024*. The maisonettes are also served by private gardens to the rear. Refer to the *Housing Quality Assessment* by JFA for a breakdown for each unit.

A 16m separation distance between opposing first floor rear windows is maintained across the site and with neighbouring properties.

The design and layout maximises the number of units looking over public open space.

The orientation of gardens has been optimised where possible. Where north facing gardens are proposed, the majority of these homes have south-facing frontage over public open spaces.

2.3.6.6 Boundary Treatments

Details on the boundary treatments can be found on Drg No. L2107 by Park Hood and in their *Landscape Design Statement.*

In summary, the following is approach is proposed:-

- The access road leading from Blackrock Road and boundary to the East of the Creche proposes a low black mesh panel fence screened with hedge planting creating a softer approach where possible whilst still offering security.
- concrete gravel board / panel solid boundary will be provided to the external area of the creche to ensure privacy and security.
- The 'Louth' Wall along Bothar Maol entrance and Blackrock Road proposes masonry stone in keeping with the character of this boundary.
- A 2 m concrete blockwork wall is proposed for the rear boundary between back gardens and to the rear of housing on Bothar Maol.
- Existing boundaries to golf course, including mature pine trees and mature hedgerow, will be maintained with 2m concrete gravel board / panel fencing used to limit root damage
- 2m block rendered walls are provided onto public areas.
- Concrete post and timber panel wall is proposed between back garden boundaries with block walling and piers for the rear back to back boundary.
- Where a boundary faces onto a public footpath or open space a rendered wall with brick piers is used.

2.3.7 Childcare Facility

The proposed development includes a two storey crèche building, located in the southeast of the subject site. The gross floor area of the crèche is 570.7 sqm, with a large outdoor secure play area (813 sqm). The crèche is a fully accessible two-storey structure, with a capacity of c. 120 children.

The location of the crèche building has been designed to be adjacent to the new access road which will lead to the Blackrock Road (R172), to ensure ease of access to new residents of the development as well as the wider community.

20 no. car parking spaces are proposed to serve the crèche, including 1 no. accessible space. All spaces will be ducted to allow for EV charging points in the future. Additionally, 6 long-term and 16 no. short-term cycle spaces are proposed to serve the crèche.

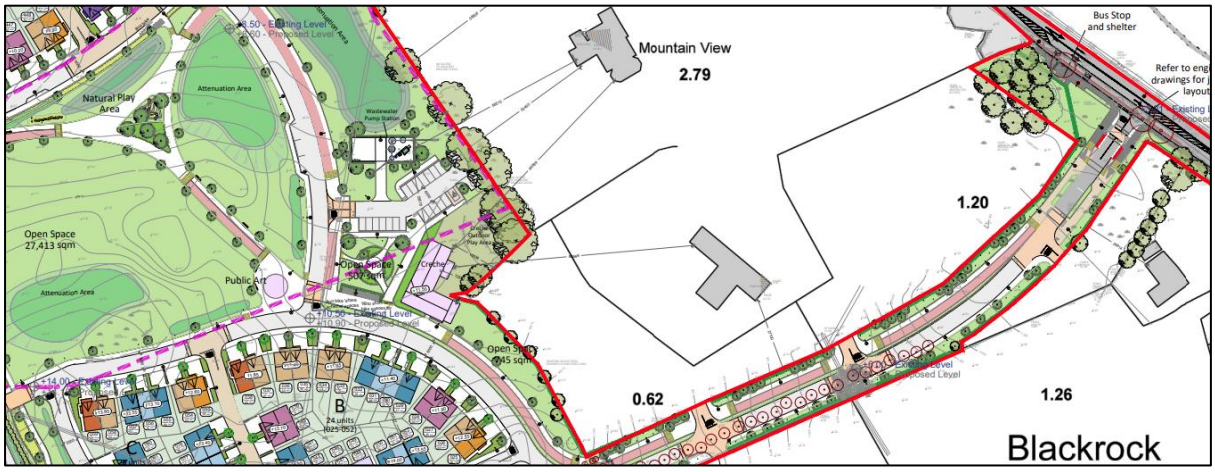

Figure 2-13 Location of Crèche (Extract from JFA, Drawing Pack, *Drg. No. P1004*)

2.3.8 Access, Parking and Connections

The following section should be read in conjunction with Drawing No. C-0585 and *Infrastructure Design Report* prepared by Donnachadh O'Brien & Associates Consulting Engineers and the *Transport Assessment* prepared by Systra which accompanies this application.

The site is accessed from the east, from the Blackrock Road (R172). A new entrance will be provided, with works to the design of the existing road proposed to facilitate safe turning movements. The new entrance design also includes an in-line bus stop on the western side of the R172.

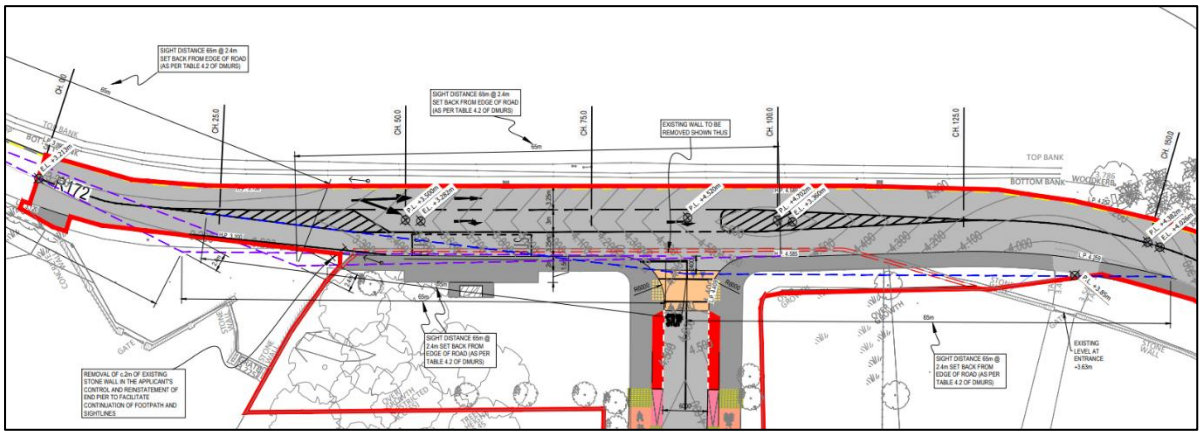

Figure 2-14 Entrance Design onto R172, with in-line bus stop west of the entrance (Extract from DOBA, Drawing Pack, Drg. No. C-0585)

The internal road layout is designed to control traffic speeds through the use of cul-de-sacs and subtle changes of alignment. These measures will act to slow vehicular traffic by decreasing the driver's perception of acceptable speeds and encourages the use of the roadway as a shared space for play. The layout is designed to provide a safe and secure arrangement of movement for the future residents.

Car parking is provided on site, at the rate of 2 spaces per dwelling for 3-bed and 4-bed units, and 1 space per unit for 1-bed and 2-bed units. The proposed scheme also includes 24 no. visitor car parking spaces.

Two further pedestrian / cycle access points to the site are proposed from Bóthar Maol. The main access road from the east also provides for future access to adjacent lands. The following figure shows the connections through the site.

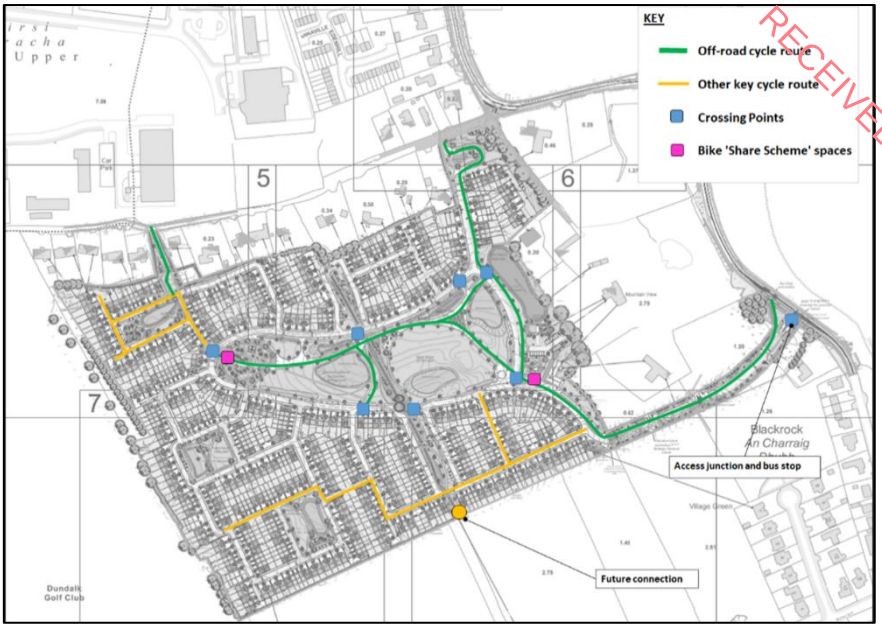

Figure 2-15 Pedestrian and Vehicular routes through site and connections (Extract from Systra, Transport Assessment)

Cycle parking is provided on site, with rear garden access or front garden bike stores provided for all residential units. The proposed scheme also includes 120 no. visitor cycle spaces, and 16 no. bicycle share spaces.

Vehicular and cycle parking is provided separately for the proposed crèche unit (20 no. car parking spaces, 6 no. long-term cycle parking spaces, 16 no. short-term cycle parking spaces).

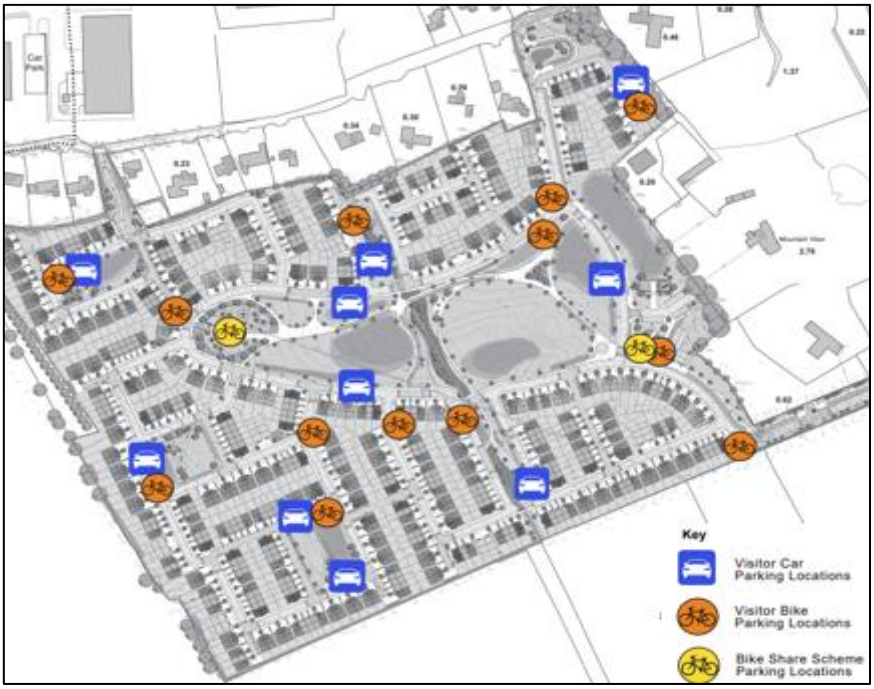

Figure 2-16 Parking Provision (Extract from JFA, *Architectural Design Statement*)

A Mobility Management Plan forms part of the *Transport Assessment* prepared by Systra which accompanies this application. A Stage 1 Road Safety Audit also accompanies this LRD Planning Application.

2.3.9 Drainage

The following section should be read in conjunction with the drawings and *Infrastructure Design Report* prepared by Donnachadh O'Brien & Associates Consulting Engineers which accompany this application.

2.3.9.1 Wastewater

Wastewater will be collected on site and will discharge by gravity to an onsite wastewater pump station, located along the eastern boundary of the site, north of the carpark associated with the proposed creche.

The proposed wastewater network will collect effluent from the new development and has made provision for the existing dwelling to the east to connect in future.

Wastewater will be pumped north along the Blackrock Road (R172) via a new rising main to Finnabair Crescent, where it will discharge to the existing wastewater drainage network which outfalls to the Coes Road Wastewater Pumping Station.

Uisce Éireann have confirmed the site is serviceable and has issued the Client with a Confirmation of Feasibility (COF) and Statement of Design Acceptance (SoDA) for the proposed development. The COF confirms that capacity is available in the public system, albeit discharges over 61m^3 must be stored on site during the day and discharged between 7pm and 7am.

Additionally, a Connection Agreement for 200 no. units to discharge wastewater to the Coes Road Pumping Station is already in place and paid for by the Client (UÉ Ref. No. CDS2200761301). This relates to the previous SHD permission on the lands.

Refer to the enclosed drawings and *Infrastructure Design Report* prepared by Donnachadh O'Brien & Associates Consulting Engineers for detailed specification and loadings.

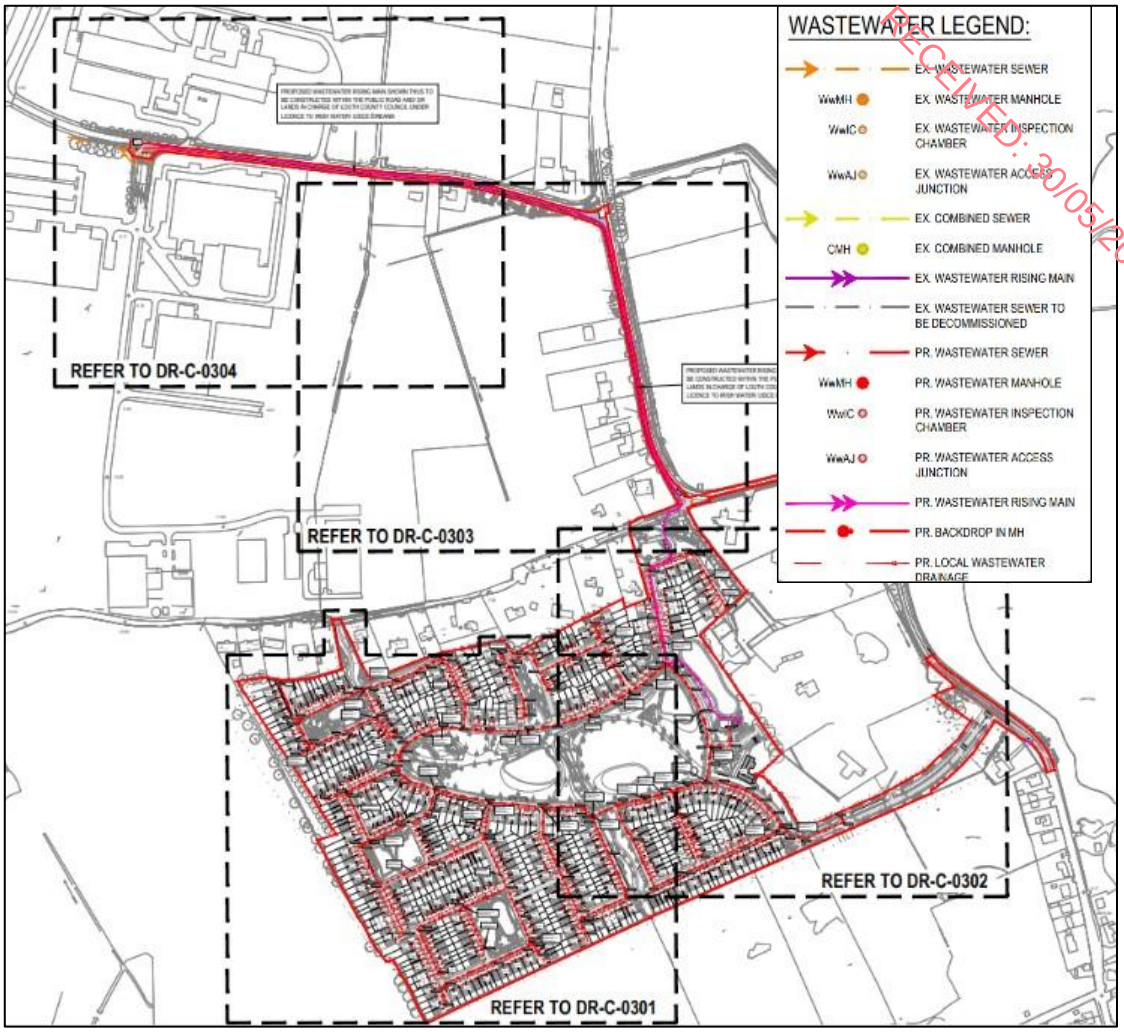

Figure 2-17 Proposed Wastewater Drainage Strategy (Extract from DOBA, Drawing Pack, Drg No. C-0300)

2.3.9.2 Surface Water

The following section should be read in conjunction with the drawings and *Infrastructure Design Report* prepared by Donnachadh O'Brien & Associates Consulting Engineers which accompanies this application.

The surface water proposals proposed are generally as per the previous LRD application, with on site attenuation, discharging to Dundalk Estuary. Attenuated surface water from the proposed main residential area of the site will discharge to an existing nearby drainage channel, with a separate discharge from the proposed access road to the existing nearby wetlands system and associated conveyance channels.

The proposed development is designed to minimise the extent of hard surfaces, and to employ SuDS to mitigate any remaining surface water run-off.

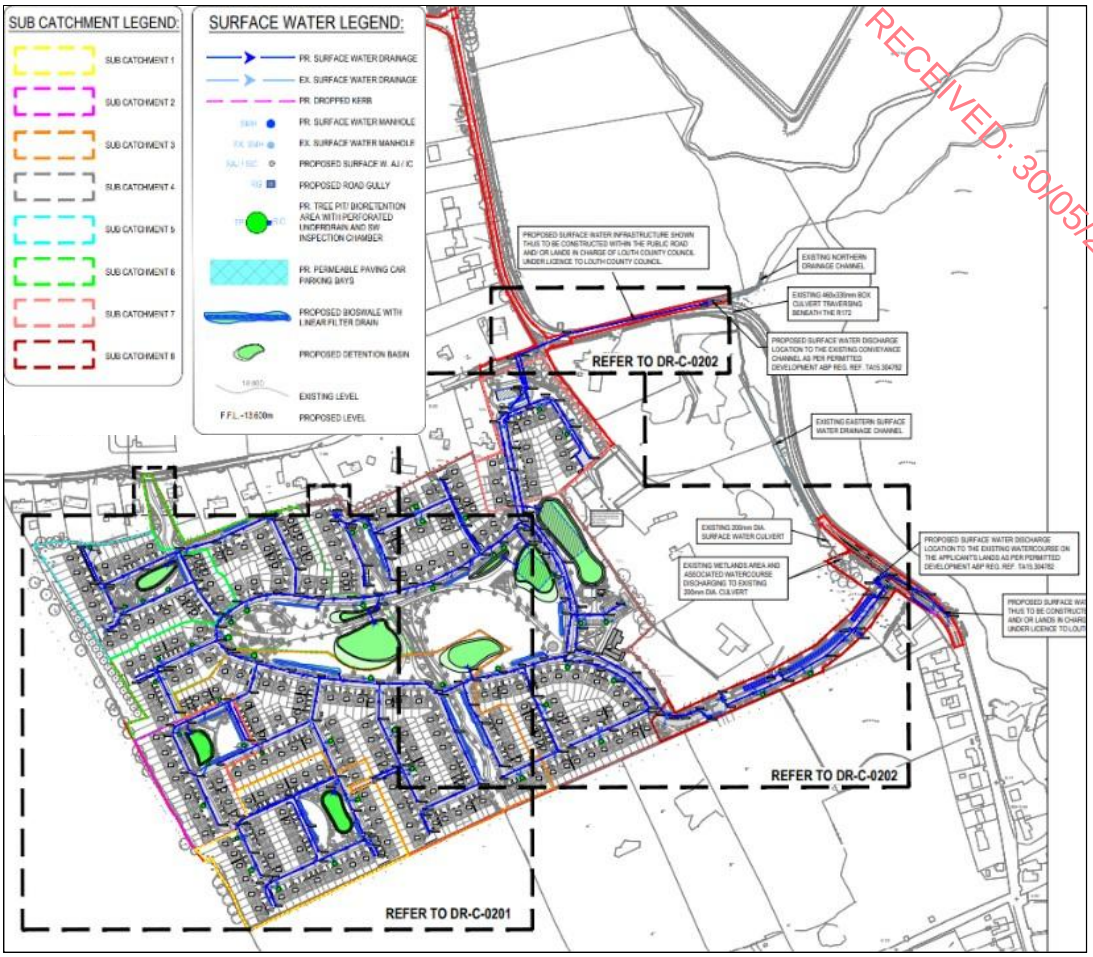

Figure 2-18 Proposed Surface Water Drainage Strategy (Extract from DOBA Drawing Pack, Drg. No. C-0200)

The SuDS treatment train proposed incorporates filtration systems, nature-based SuDS measures, a detention system, and a proprietary treatment system (a class 1 bypass petrol interceptor).

Three types of nature-based SuDS measure are proposed as part of the overall SuDS treatment train: bio-retention tree pits, bio-swales, and detention basins.

The proposed surface water outfall is land-side of the high-water mark and therefore the requirement for a foreshore licence or other maritime consent is not required. Refer also to Appendices A and F of the DOBA *Infrastructure Design Report* for further commentary and figures.

The design and management of surface water for the proposed development complies with the requirements of the Greater Dublin Strategic Drainage Study (GDSDS).

The design of the surface water network and SuDS measures within the application site includes a 20% climate change factor, in accordance with the requirements of Louth County Council Water Services.

IE Consulting completed a hydraulic assessment of the existing open channels to inform the proposed design. This report - *Hydraulic Modelling, Assessment and Analysis Report* - is included as a standalone report with the application.

The results of the simulation indicate that the maximum attenuated surface water discharges from the proposed development site would not result in an increase in flood water levels in the conveyance channels, would not have an adverse impact on the existing hydrological regime or result in an increased flood risk to adjacent lands or properties or result in an adverse impact to the existing hydrological regime of the area. The Report concludes that the approach *"is considered to be appropriate from a hydrological and flood risk perspective."*

2.3.9.3 Water Supply

The following section should be read in conjunction with the drawings and *Infrastructure Design Report* prepared by Donnachadh O'Brien & Associates Consulting Engineers which accompany this application.

Uisce Éireann have confirmed the site is serviceable and has issued the Client with a Confirmation of Feasibility (CoF) and Statement of Design Acceptance (SoDA) for the proposed development.

A new 200mm dia. looped watermain with 150mm and 100mm dia. spurs as required shall be installed on site along with a new bulk water meter. The 200mm main will connect to the upgraded 150mm dia. water Supply on the R172 Blackrock Road to the east of the development in accordance with the requirements of the CoF.

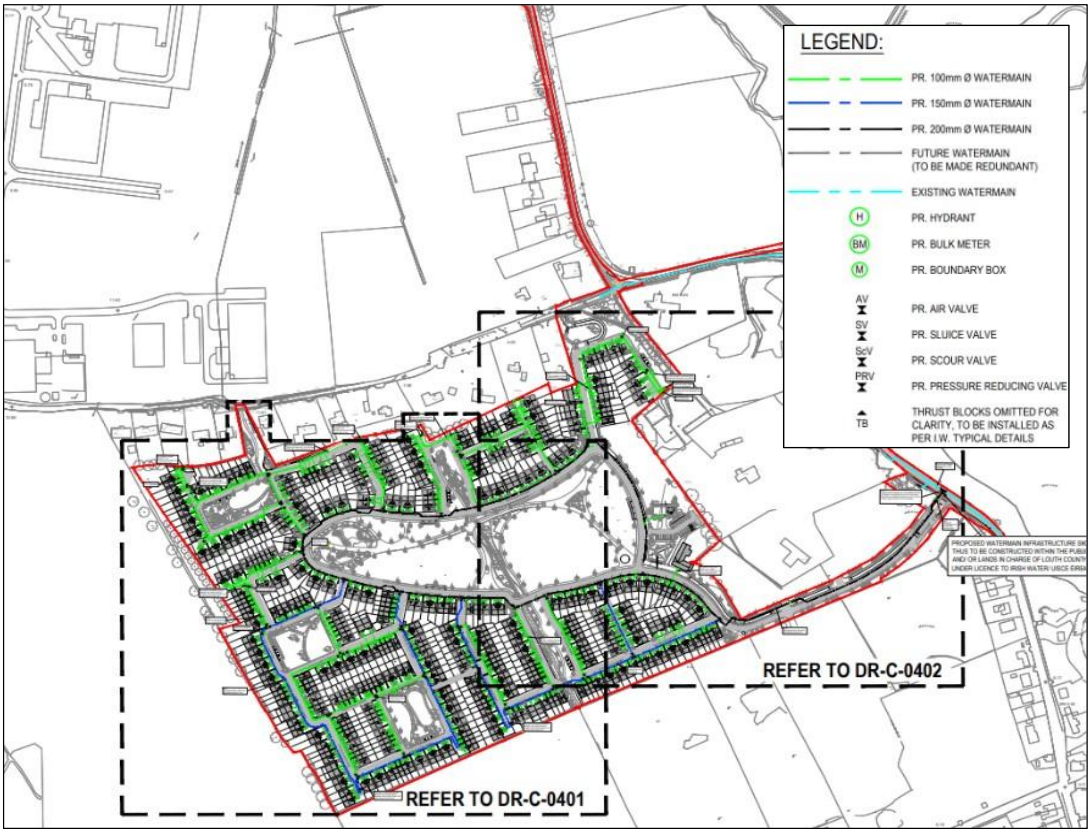

Figure 2-19 Proposed Water Supply (Extract from DOBA Drawing Pack, Drg No. C-0400)

2.3.10 Services

2.3.10.1 Electrical Supply

ESB maintains underground and overhead powerlines within and around the existing subject site as indicated in the Figure below. The existing 20kV and 38kV overhead power-lines which traverse the site are to be undergrounded and diverted.

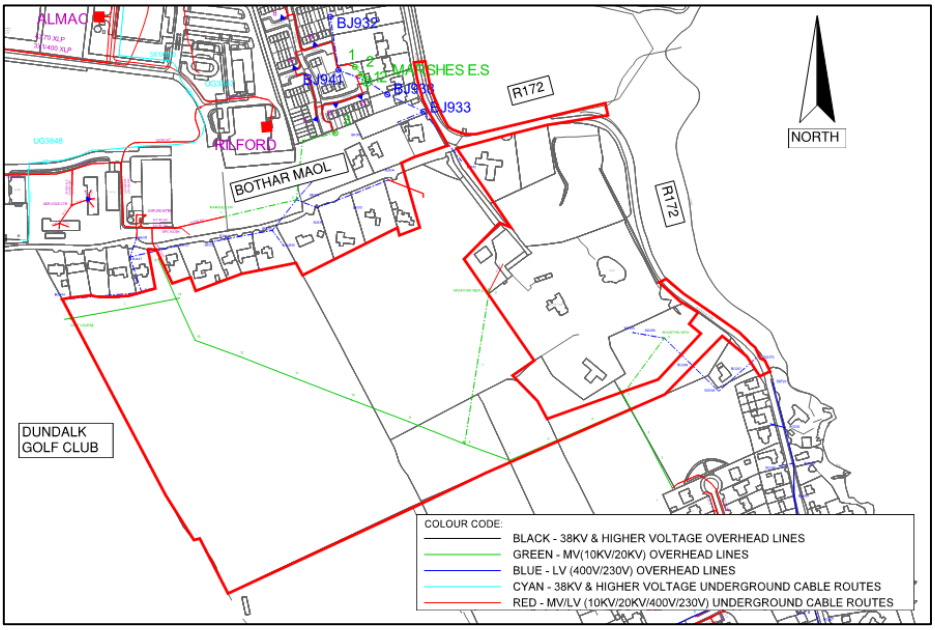

Figure 2-20 Existing ESB Infrastructure

2.4 Changes to the Proposed Development

This development was arrived at following detailed design and has evolved as an iterative process within the Design and Environment Teams and in response to feedback from the Local Authority through the LRD process. The alternative designs proposed leading us to the preferred design described above are outlined in Chapter 3 of this EIAR.

2.5 Demolition & Construction Phase

This application is accompanied by an *Outline Construction and Environmental Management Plan* (OCEMP). This Report should be read in conjunction with this chapter for a comprehensive description of the construction phase.

Assumptions are made in the Outline CEMP based on the information available at this time. The CEMP is a 'live' document. On receipt of a grant of permission, the appointed contractor(s) will update the Outline CEMP to comply with and implement the requirements and mitigation and monitoring measures of the EIAR and any conditions imposed as part of a grant of permission. The Contractor(s) CEMP will be submitted to the Council prior to commencement.

2.5.1 Programme

The Table below sets out the proposed phases of development. The current indicative phasing suggests that the project will be split over 2 phases and a period of c. 48 months. Details are included in the CEMP and Phasing Drawing included with the architectural plans which accompany this application.

Phases may overlap, with construction in subsequent phases commencing before works are completed in the previous phase.

These phases and sequencing are based upon the information available at this time and for the avoidance of doubt, it is not proposed or intended that the applicant / contractor(s) are bound by these proposals which may change depending on the timing and circumstances pertaining at the time of construction including market demand, planning permission, funding, etc. On receipt of a grant of permission, and appointment of a contractor, the Outline Construction and Environmental Management Plan will be updated and the Phasing Plan confirmed.

A 7 year permission is being sought. This is to allow time for mobilisation and detailed design following a grant of permission, with an additional buffer included to account for a legal challenge to a grant of permission.

Table 2-3 Indicative Phasing, Duration and Sequencing

Phase 1	
Enabling Works & Site Set Up	24 months for completion of first 198 houses plus the creche with associated infrastructure
Installation of the surface water outfall pipe and headwall adjacent to the R172	
Installation of spine surface water sewers, wastewater sewers, water mains and surface water attenuation.	
Installation of Type 3 Wastewater Pumping Station	
Installation of Wastewater and Watermains on the Public Roads, including works along Blackrock Road and Tandy's Lane.	
Construction of new development entrance and modification works to the R172 including new bus stop	
Construction of Phase 1 housing units and creche	
Installation of Phase 1 roads, footpaths & cycle paths and shared parking bays	
Installation of Phase 1 hard and soft landscaping and permeability links including Loakers Park	
Phase 2	
Site Set Up	

Installation of spine surface water sewers, wastewater sewers, water mains and surface water attenuation.	24 months for completion of second phase of 304 units with associated infrastructure & open space
Construction of Phase 2 housing units	
Installation of Phase 2 roads and footpaths	
Installation of Phase 2 hard and soft landscaping and permeability links to adjacent lands	

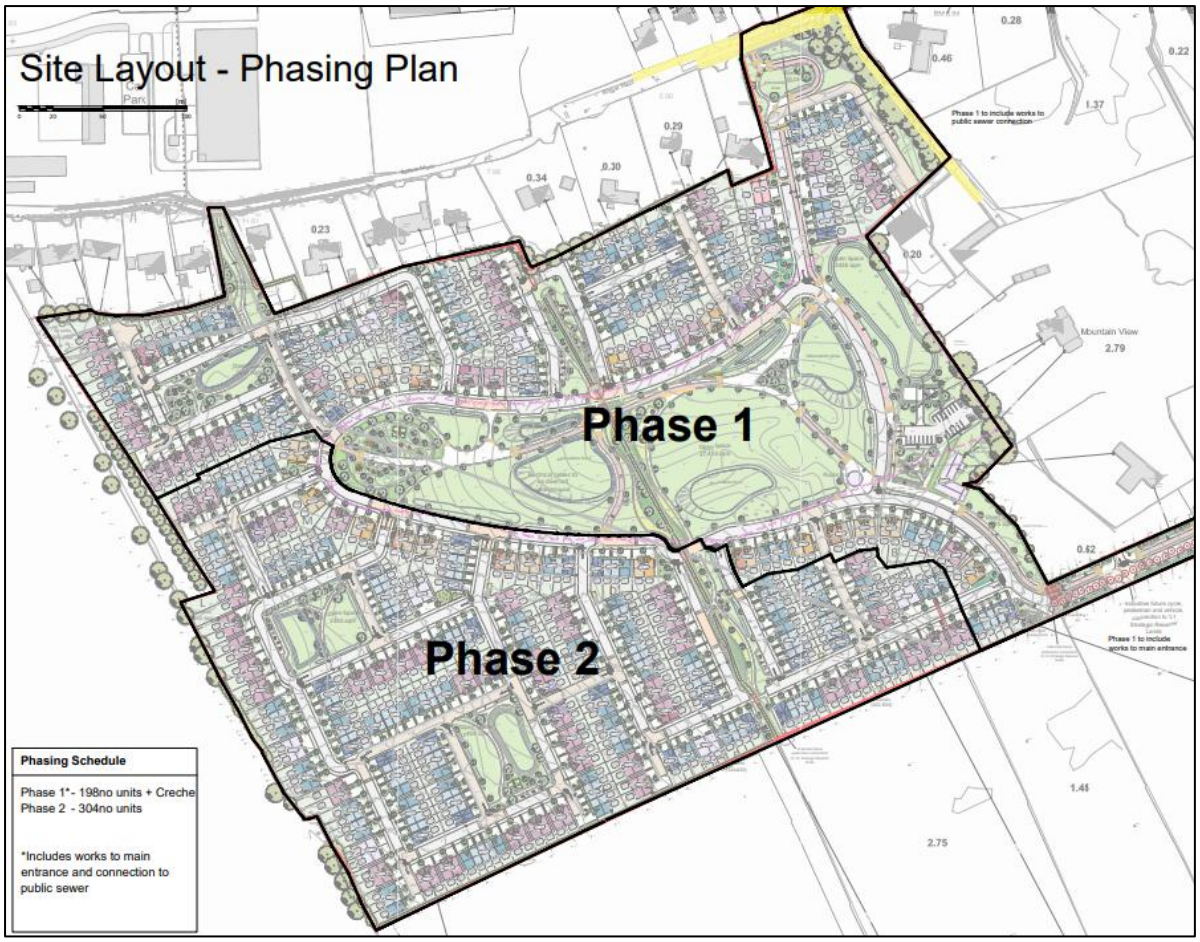

Figure 2-21 Phasing Plan (Extract from JFA, Drawing Pack, Drg. No. P1016)

2.5.2 Site Compound

The Contractor's construction compound will be located on site and shall primarily consist of

- Site Offices & associated welfare facilities,
- Materials drop-off and storage areas;
- Set down areas for HGVs

Materials to be stored on site will be stored in a safe manner and will minimise the risk of any negative environmental effects and will be managed on a 'just-in-time' basis. All fuel storage areas will be bunded in the compound and will be clearly marked. Fuel will be transported from the offsite compound to the plant and equipment in mobile units based on need. A dedicated fuel filling point will be set up on site with all plant brought to this point for filling. Temporary toilets and wash facilities will be provided for construction workers which may require periodic waste pumping and waste offsite haulage and shall be carried out by an authorised sanitary waste contractor.

2.5.3 Site Management

2.5.3.1 Hoarding

The Contractor will establish a site boundary with the provision of appropriate signage, construction of hoarding, and welfare facilities, site office, and establishment of appropriate access and egress. The construction site hoarding will be provided as a secure site boundary to what can be a dangerous environment for people who have not received the proper training and are unfamiliar with construction operations established around the work area before any significant construction activity commences. Site hoarding minimises some of the potential environmental impacts associated with construction, namely:

- Noise,
- Visual impact,
- Dust.

Controlled access points to the site, in the form of gates or doors, will be kept locked for any time that these areas are not monitored (e.g. outside working hours). The hoarding shall be painted, well maintained and contain graphics relating to the proposed development.

The Contractor shall ensure that the site hoarding will avoid unauthorised entry to site and thus minimise the risk of vandalism.

2.5.3.2 Site Maintenance

The Contractor shall continuously maintain the site and its surrounding environs by carrying out the following: -

- Maintain work areas and ensure staff welfare facilities and material storage areas are kept clean,
- Provide site layout maps identifying key areas such as first aid posts, material storage, spill kits, material and waste storage and welfare facilities,
- Maintain all plant, material and equipment required to complete the construction work,
- Maintain construction compounds, access routes and designated parking areas free and clear of excess dirt, rubbish piles, scrap wood, etc. at all times,
- Prevention of the discharge of fuel & oil from bunded areas,
- Provision of appropriate waste management at each working area,
- Prevention of infestation from pests or vermin,
- Maintenance of wheel washing facilities,

- Prevention of site runoff or surface water discharge,
- Maintenance of public rights of way, diversions and entry/ exit areas around working areas for pedestrians and cyclists where practicable,
- Material handling and/or stockpiling of materials, where permitted, will be appropriately located to minimise exposure to wind. Water misting or sprays shall be used as required if particularly dusty activities are necessary during dry or windy periods.

2.5.3.3 Site Lighting

The Contractor shall implement the following measures in relation to site lighting: -

- Site lighting will be provided with the minimum luminosity sufficient for safety and security purposes to avoid shadows cast by the site hoarding on surrounding footpaths, roads and amenity areas,
- Motion sensor lighting and low energy consumption fittings will be installed to reduce usage and energy consumption,
- Site lighting positioned and directed so as not to unnecessarily intrude on adjacent buildings and land uses, ecological receptors and to avoid causing distraction or confusion to passing motorists,
- Provide tower crane mounted 1000W metal halide floodlights which will be cowled and angled to minimise spillage to surrounding properties.

2.5.4 Access

Construction traffic will comprise the construction workers (cars) and HGVs / LGVs carrying construction materials. HGVs will arrive and depart from the site at regular intervals during working hours whilst staff trips to and from the site will generally take place just in advance of the site working hours and following the site close in the evening.

It is anticipated, based on current plans and phasing, that there will be an average of 6 HGV vehicular movements per hour, during the working day, totalling 40 HGV's a day, during the peak period of construction activity. It is anticipated that outside of this peak period, the average daily HGV's will reduce to 25 HGVs per day.

In addition, based on current projections, the number of construction workers including sub-consultants is expected to average 75-90 personnel a day. Based upon a typical vehicle occupancy of 3 workers per vehicle, this would result in up to 30 inbound, and 30 outbound, vehicle trips to the site.

The Framework Traffic Management Plan (Included in the Outline CEMP) proposes that HGVs would travel to and from the site via either the R132 or N52, and use Finnabair Crescent to reach the R172. HGVs would not be permitted to travel through Blackrock Village.

The details of the proposed construction routing will be agreed with LCC, prior to commencement of construction works, with the national road network being used as much as possible.

2.5.5 Parking

The developer shall provide adequate off carriageway parking facilities for all relevant traffic associated with the development, and none of these vehicles will be parked on the public network.

Certain trades will require parking on site for vehicles due to transportation of specialist equipment/plant requirements. There will be a provision for such vehicles in a specially designated parking area located beside the site compound and storage area. Any parking of HGVswill be inside the site and in designated areas which will be clearly marked out. HGVs will generally only be carrying out deliveries to site. During timber frame construction HGVs will be directed towards a clearly marked out exclusion zone.

2.5.6 Construction Hours

The proposed normal working hours, subject to Planning Permission, during the construction phase are as follows: -

Start	Finish	Day(s)
08 00	18 00	Monday to Friday
08 00	13 00	Saturday

No works are proposed on Sundays or Bank Holidays or after the hours noted above, however, it may be necessary to work outside of these hours in exceptional circumstances such as Night Works or Weekend Works during certain construction activities.

2.5.7 Construction Personnel & Parking

It is anticipated that at the peak of the construction phase that there will be an average work force of 75-90 people

2.5.8 Demolition Phase

To facilitate the proposed development, the removal of works completed under a previously permitted SHD development including the foundations for 5 no. houses is required. The ruins of a former pumphouse will also be removed / demolished as part of the works and existing overhead electrical lines will be undergrounded. It is envisaged that these works will be undertaken as part of the enabling works and site set up in Phase 1.

2.5.9 Earthworks

The proposed development will involve excavation, stripping of topsoil and removal of material from site for platform installations and regrading of the site profile to suit the developed site layout. This will include the following:-

2.5.9.1 Excavation Waste Arising

The proposed development will involve excavation, stripping of topsoil and removal of material from site for platform installations and regrading of the site profile to suit the developed site layout. The proposed development will require excavation for the following non-exhaustive list of activities with associated approximate volumes of the materials to be excavated:-

- Topsoil 53,000m^3
- Subsoils from reduced level excavations 32,500m^3
- Subsoils for main drainage and attenuation 10,000m^3
- Rock for main drainage and attenuation 5,000m^3
- Subsoils for site services 10,000m^3

The re-use of clean, inert / non-hazardous excavation material as landscaping or engineering fill will also be considered following appropriate material testing and risk assessment to ensure the material is suitable for its proposed end use.

The following quantities are assumed to be reused in the development:

- Topsoil 28,000m^3
- Subsoils from reduced level excavations 6,500m^3
- Rock for main drainage 5,000m^3

Where excavation material may not be re-used within the proposed works the Contractor will endeavour to send material for recovery or recycling so far as is reasonably practicable or disposal to an appropriate licensed landfill in accordance with the Landfill Directive.

The following quantities are assumed to be removed offsite for reuse or to an appropriate licenced landfill:

- Topsoil 25,000m^3
- Subsoils from reduced level excavations 26,000m^3
- Subsoils for main drainage and attenuation 10,000m^3
- Subsoils for site services 10,000m^3

Any potentially contaminated material encountered during construction, will require testing and classification as either non-hazardous or hazardous in accordance with the EPA publication entitled 'Waste Classification: List of Waste & Determining if Waste is Hazardous or Non-Hazardous' using the HazWasteOnline application. The material will then need to be classified as clean, inert, non-hazardous or hazardous in accordance with the EC Council Decision 2003/33/EC. The Contractor will be responsible for determining how excavation material from the proposed development will be managed and a full list of all facilities to which hazardous and non-hazardous waste excavation soil and stones will be sent will be provided in the detailed CMP prepared by the Contractor.

2.5.9.2 Excavation Waste Management

A suite of ground investigations (refer to Appendices 9-1 and 9.2 of the EIAR) has been carried out on site which includes the following;

- Trial Pits & BRE365 soakaway tests
- Rotary Cores
- Geophysical Survey

- Ground Water monitoring
- Geotechnical Laboratory Testing
- Geo-environmental Testing

In summary, the underlying strata consists of predominately silty sandy gravelly CLAYS over rock.

2.5.9.3 Reuse

The reuse of excavated material must be certain. There must be no intention or requirement for it to be discarded. In addition, there must be no further processing required in order for it to be reused. Soil, rock and naturally occurring material excavated in the course of construction activities can be reused within the proposed development where feasible, subject to further testing to determine if materials meet the specific engineering standards for their proposed end-use. Where naturally occurring material is used for the purpose of construction in its natural state within the proposed development this material is not deemed to be a Waste in accordance with Article 2 of the Waste Directive 2008/98/EC, the European Communities (Waste Directive) Regulations, 2011 and Section 3 of the Waste Management Act 1996, as amended. Where a certificate of registration, Waste facility permit or Waste licence is required by the Contractor in order to reuse excavation material within the proposed development, this will be obtained from either the local authority or the EPA. Further to rock reusability testing, the Ground Investigation notes that rock fill is suitable for use as 6F2 capping material across the development subject to appropriate material testing and grading on site.

2.5.9.4 Article 27

Article 27 of the EC Waste Directive Regulations 2011 permits surplus excavation material to be declared as a by-product for use in one of more known construction projects. An Article 27 notification to the EPA under Article 27 of the EC Waste Directive Regulations 2011 is required to achieve by-product status for soil and stones. By-product notifications to the EPA provide an opportunity for reuse of surplus clean soil & stone material arising from construction activity which bring significant economic benefits while facilitating beneficial re-use of by-products. Prior to the commencement of construction, the CMP will be updated to reflect specific measures to minimise waste generation and resource consumption during construction, including providing details of proposed waste contractors and destinations of each waste stream while the CMP will be fully implemented during the proposed construction phase. Furthermore, a quantity of 125,000m^3 of both topsoil and sub soil will need to be excavated to facilitate the proposed development and this may include the importation/exportation of topsoil & sub soil while the Site Investigation (SI), Waste Acceptance Criteria Testing (WAC testing) and Soil Analysis will be used to classify and determine the suitability of soil. Any soil (topsoil & sub soil) identified as 'contaminated' or not equivalent to virgin greenfield for by-product soil and stone, will be treated as waste and will be segregated on-site, stored in skips or other suitable receptacles in designated areas and will be removed from site to a suitable waste facility by a registered waste contractor. All waste leaving the site will be transported by suitably permitted contractors and taken to suitably registered, permitted or licenced facilities. Where soil and stone can be re-used as fill, and is considered to be a By-Product, it will be imported/exported under notification of Article 27 to the EPA, in accordance with Article 27 of the EC (Waste Directive) Regulations (2011). EPA approval will be obtained prior to moving material as a By-Product. Finally, a log of all By-Product material

movements will be recorded and maintained. The above figures do not allow for bulking or for the additional dig required for temporary/construction slopes, services, utilities, etc.

2.5.9.5 Invasive Species

In order to identify and manage any invasive species, such as Japanese Knotweed, a site walk-over was conducted by DNV and its surrounding areas along its perimeter. **No** Schedule 3 of SI 355/2015 invasive species were recorded within the property boundary.

2.6 Construction Activities

The following is a non-exhaustive list and description of the construction activities on site:

- Site set up
  - Haul Road
  - Contractors Compound
  - Security Fencing / Hoarding
- Site clearance
  - Topsoil strip and temporary storage for reuse
- Excavation
  - Subsoils excavated and temporary storage for potential reuse
  - Rock breaking, excavation and temporary storage for potential reuse (crushing, grading etc).
- Erection and operation of cranes
- Substructure and Superstructure
  - Foundations
  - Build structure – timber frame with brick / render facade
  - Fit out
- Roads
- Services
  - Main Drainage (Wastewater, Surface Water)
  - Utilities (ESB, Water Supply, Telecoms, Public Lighting)
- Open spaces and Landscaping
  - Boundary treatments (walls, fencing etc)

2.7 Construction Materials

2.7.1 Proposed Importation of Aggregate

The Applicant has carried out rock reusability testing which notes that the existing rock is suitable for use as 6F2 material. In addition to the re-use of rock recovered from the site, the development will require the following approximate quantities of aggregate to be imported for use;

- Rock reuse = 5,000m^3
- Dwelling sub-structure = 20,000m^3

- Driveways = 10,000m^3
- Roadways = 12,000m^3
- Main drainage = 15,000m^3
- Site services trenches /under paths= 10,000m^3

2.8 Construction Waste Arising

Construction Waste is defined as Waste which arises from construction activities. The following sections analyse the wastes arising from construction activities on site and provides methods for management of waste through prevention, reuse and recycling.

2.8.1 Estimate of Construction Waste Arising

The Building Research Establishment (BRE) UK have produced benchmarks derived from data out of the BRE SMARTWaste Plan issued in June 2012 as outlined in the Figure following.

Project Type	Number of projects data relates to	Average m^3/100m^2	Number of projects data relates to	Average m^3/£100K
Residential	677	18.1	669	12.3
Public Buildings	49	20.9	55	10.7
Leisure	71	14.4	69	9.2
Industrial Buildings	54	13.0	55	10.8
Healthcare	86	19.1	85	9.1
Education	263	20.7	272	10.0
Commercial Other	4	17.4	2	9.7
Commercial Offices	60	19.8	56	9.3
Commercial Retail	123	20.9	122	15.0
Total number of projects	1387		1385	

Figure 2-22 BRE SMARTWaste benchmark data by project type

The table below is a breakdown of the quantities of Construction Waste which will be produced based on the BRE data outlined above.

Table 2-4 Quantities of Proposed Construction Waste

Type	Proposed Gross Internal Floor Area (m^2)	Average m^3/ 100m^2	Construction Waste (m^3)
Residential	c. 51,440	18.10	9,303
Creche	c. 571	17.40	100

Therefore, the total Waste from buildings to be generated during the construction phase of the project is estimated at c. 9,403m^3. The Contractor will ensure that Waste generation on site is minimised and that Waste removed from site for recovery or disposal is reduced where feasible.

2.9 Construction Waste Management

The Contractor shall as a minimum implement the following measures to prevent Waste generation, facilitate Waste recycling and minimise Waste disposal during the construction phase:

2.9.1 Source Segregation

Metal, timber, glass and other recyclable material will be segregated and removed off site to a permitted/licensed facility for recycling. Waste stream colour coding and photographs will be used to facilitate segregation. Office and food Waste arising on site will be source separated at least into dry mixed recyclables, biodegradable residual Wastes. Paints, sealants and hazardous chemicals etc. will be stored in secure, bunded locations. All hazardous Waste will be separately stored in appropriate lockable containers prior to removal from site by an appropriate Waste collection holder. Waste bins, containers, skip containers and storage areas will be clearly labelled with Waste types which they should contain, including photographs as appropriate. The site will be maintained to prevent litter and regular litter picking will take place throughout the site.

2.9.2 Material Management

'Just in time' delivery will be used so far as is reasonably practicable to minimise material wastage. Waste generated on site will be removed as soon as practicable following generation for delivery to an authorised Waste facility. The Contractor will ensure that any off-site interim storage facilities for excavated material have the appropriate Waste licences or Waste facility permits in place.

2.9.3 Contractor(s) CEMP

The Contractor(s) will be required to further develop and detail the Outline CEMP prior to commencement of the proposed works. Best Practice Measures as outlined in the Outline CEMP should be included as a minimum.

2.9.4 Collection of Construction Waste

Waste from Construction will be transported by authorised Waste collectors in accordance with the Waste Management (Collection Permit) Regulations 2007, as amended. An up-to-date list of all Waste collectors used to transport Waste from site during the proposed development will be maintained on site and updated by the Contractor and be similar to the sample Waste Collection Permit table below. The Contractor shall hold valid Waste collection permits on site. The selection of waste contractors and waste facilities is subject to appropriate selection criteria including proximity, competency, capacity and serviceability. The applicant has identified the following licenced and authorised sites to take the predicted waste but reserves their right to deposit at any suitably licensed facility if these

sites are unavailable for use when required or a more suitably placed waste or recovery facility becomes operational in the future.

Table 2-5 Sample Waste Collection Permit Table

Name of Authorised Waste Collector	Company Address	National Waste Collection Permit Number	Waste Types Collected (Text Description)	Waste Types Collected (EPA LoW Codes)
Dundalk Landfill & Civic Waste Facility	Dundalk Town Council, Newry Road, Dundalk, Louth	W0034-02	Cardboard, Glass, Metal,	
Integrated Materials Solutions Limited Partnership	Hollywood Great, Nags Head, The Naul, Dublin	W0129-02	Glass, Concrete, Bricks, Tiles, Ceramics, Asphalts	
Rilta Environmental Ltd	14A1 Grants Road, Greenogue Business Park, Rathcoole, Co. Dublin	W0185-01	Contaminated Soils, Glass, Packaging, Hazardous Waste Management	
Clashford Recovery Facilities Ltd	Naul Townland, Naul, Meath			
North City Operations Depot	St. Margaret's Road, Ballymun, Dublin 11, Dublin	W0302-01		
Allied Recycling	Clonmellon Industrial Estate, Clonmellon, Co. Westmeath	WFP-WH-2022-0002-00	Plasterboard	
Haughey Metals	Dundalk, Co. Louth	WL-LN 09 13	Metals	

2.9.5 Offsite Disposal of Construction Waste

Waste from Construction will be delivered to authorised Waste facilities in accordance with the Waste Management Act 1996, as amended. The Contractor shall maintain an up-to-date list, similar to the sample Table below, of all Waste facilities to which Waste from the site will be delivered and copies of valid appropriate facility Certificates of Registration, Waste Facility Permits and Waste Licences.

Table 2-6 Sample Authorised Waste Facilities (form is left blank intentionally)

Name of Authorised Waste Facility	Waste Facility Address	Number of Waste Licence/ Waste Permit/ Certificate of Registration	Regulatory Authority	Waste Types to be delivered (Text Description)	Waste Types to be delivered (EPA LoW Coes

2.10 Construction Waste Management Costs

As required by the Department of the Environment, Heritage and Local Government Best Practice Guidelines on the Preparation of Waste Management Plans for Construction Projects this section addresses costs of Waste management. The total cost of implementation of the CWMP will be measured by the Contractor and will take into account handling costs, storage costs, transportation costs, revenue from rebates and disposal costs.

2.10.1 Reuse/ Recovery

By reusing materials on site, there will be a reduction in the transport and disposal costs associated with the requirement for a Waste Contractor to take the material away to landfill. Clean and inert soils, gravel, stones etc. which cannot be reused on site may be classified as a by-product (under Article 27 of the 2011 Waste Directive Regulations), used as capping material for landfill sites, or for the reinstatement of quarries etc. subject to approvals by EPA. This material is often taken free of charge for such purposes, or when used as capping in landfills will not attract the landfill tax levy, thereby reducing final Waste disposal costs.

2.10.2 Recycling

Salvageable metals will earn a rebate which can be offset against the cost of collection and transportation of the skips. Clean, uncontaminated cardboard and certain hard plastics can be recycled. Waste Contractors will charge considerably less to take segregated Wastes such as recyclable Waste from a site than mixed Waste. Timber can be recycled as chipboard. Again, Waste Contractors will charge considerably less to take segregated Wastes, such as timber from a site than mixed Waste.

2.10.3 Disposal

Landfill charges are currently at approximately €170/tonne (includes a €85 per tonne landfill levy and a €10 C&D waste landfill levy introduced under the Waste Management (Landfill Levy) (Amendment) Regulations 2024) for non-hazardous Waste and €25/tonne for inert Waste. In addition to disposal costs, Waste Contractors will also charge a collection fee for skips. Collection of segregated C&D Waste

usually costs less than municipal Waste. Specific C&D Waste Contractors take the Waste off-site to a licensed or permitted facility and, where possible, remove salvageable items from the Waste stream before disposing of the remainder to landfill. Clean soil, rubble, etc. is also used as fill/capping material wherever possible.

2.10.4 CWMP Auditing

The Contractor's CWMP shall carry out regular Waste Audits in accordance with the Contractors Project Specific Waste Audit Plan which shall be a systematic study of the Waste management practices applied in the project to highlight the problems that Waste can cause and the benefits of prevention and minimisation. The CWMP's Audits shall allow the Contractor to monitor the quantity and type of Waste produced by different Sub-Contractors and identify opportunities for Waste reduction throughout each stage of the project. The Audit should identify details of raw material inputs and the quantity, type and composition of all Waste from the site. The Contractor will record the quantity in tonnes and types of Waste and materials leaving the site during the works. The name, address and authorisation details of all facilities and locations to which Waste and materials are delivered will be recorded along with the quantity of Waste in tonnes delivered to each facility. Records will show material which is recovered and disposed of. The Audit shall highlight corrective actions that may be taken in relation to management policies or site practice in order to bring about further Waste reductions which shall be supplemented with a tracking system to determine the success or failure of the corrective actions. Finally, summary audit reports outlining types, quantities of Waste arising's and their final treatment method should be sent to the relevant Authority for their information.

2.11 Monitoring

2.11.1 Construction and Environmental Management Plan

A Construction and Environmental Management Plan (CEMP) is included with this LRD planning application. The CEMP will be updated by the Main Contractor(s) following a grant of permission, to address any changes required by planning conditions and will be agreed with the planning authority prior to the commencement of development.

The CEMP demonstrates the applicant's commitment to implement the proposed development so as to avoid or minimise the potential environmental effects resulting from construction activities.

Aspects addressed within the CEMP include but are not limited to; working hours, noise and vibration; dust and air quality; traffic and vehicle management; and protection of vegetation and fauna.

The appointed contractor will be required to update and implement this CEMP throughout the course of the construction phase. All personnel will be required to understand and implement the requirements of the plan.

2.11.2 Community Liaison

The contractor will appoint a Liaison Officer to ensure that any issues from the local community are dealt with promptly and efficiently during construction. These details will be included in the Contractor(s) CEMP.

2.11.3 Integrated Pest Management

The Main Contractor will take all necessary steps to ensure that pests - rodents, birds, insects and plants are controlled at all times.

Control measures will be undertaken prior to commencement of any works on the site. Poison where used, will comply with any relevant Health and Safety requirements and which eliminate any danger to children, household pets and other wildlife.

2.11.4 Environmental

The monitoring proposed in Chapters 4 to 16 of this EIAR will be carried out during the demolition, construction and operational phases, as outlined. This monitoring is integrated to ensure that there will be no likely significant effects during development of the site.

A bespoke site Construction Environmental Management Plan (CEMP) will be prepared by the appointed Main contractor(s) prior to work commencing on site. The main purpose of a CEMP is to provide a mechanism for implementation of the various mitigation and monitoring measures which are described in the EIAR, and will incorporate any additional measures attached to a grant of permission.

All personnel will be required to understand and implement the requirements of the plan.

Aspects that will be addressed within the CEMP will include but are not limited to, waste and materials management; noise and vibration; dust and air quality; traffic and vehicle management; pollution incident control; and protection of vegetation and fauna. A summary of the mitigation measures to be incorporated into the CEMP is provided in Chapter 17 of the EIAR.

2.12 Commissioning

The testing and commissioning of services (drainage, watermain, electricity) will be completed in accordance with relevant codes of practice as set out in **Chapter 7** of the EIAR.

2.13 Property Management

A property management company will be appointed to manage the scheme and common areas to ensure that the scheme is well managed, and the development is maintained to an extremely high level. They will be responsible for inter alia cleaning, landscaping, refuse management, insurance, maintenance etc.

2.14 Decommissioning

The design life of the scheme is greater than 60 years. Thus, for the EIA process, the development is considered permanent, and a decommissioning phase is not considered in this report.

2.15 Conclusion

This chapter sets out the development parameters for the proposed development including an overview of the Architectural, Landscape and Engineering strategy. An overview of the phasing for construction has also been provided, and further information can be found in the **Outline Construction and Environmental Management Plan** prepared by DOBA.

Haggardstown LRD

Dundalk, Co. Louth

Main Statement

Volume II

CHAPTER 3

Alternatives

May 2025

McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

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3 Alternatives

This chapter was prepared by Louise O'Leary, Associate Director at McCutcheon Halley Chartered Planning Consultants. Louise has a Masters in Regional and Urban Planning (BA MRUP Hons), obtained in 2005, and a Diploma in EIA Management, obtained in 2014, both from University College Dublin. Louise is also a Corporate Member of the Irish Planning Institute.

With almost 20 years' experience in consultancy, Louise has directed and contributed to the preparation of environmental impact assessments for a variety of projects including residential, mixed use and infrastructural developments.

3.1 Introduction

The requirement to consider alternatives within an Environmental Impact Assessment Report (EIAR) is set out in Annex IV (2) of the EIA Directive (2014/52/EU) and in Schedule 6 of Planning and Development Regulations 2001 (as inserted by article 97 of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 which state (at paragraph 1(d)):

> *"A description of the reasonable alternatives studied by the person or persons who prepared the EIAR, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the proposed development on the environment".*

The requirement is elaborated at paragraph 2(b), which makes clear that reasonable alternatives may include project design proposals, location, size and scale, which are relevant to the proposed development and its specific characteristics. The Regulations require that an indication of the main reasons for selecting the preferred option, including a comparison of the environmental effects be presented in the EIAR.

The Environmental Protection Agency *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports*, 2022 states:

> *"The objective is for the developer to present a representative range of the practicable alternatives considered. The alternatives should be described with 'an indication of the main reasons for selecting the chosen option'. It is generally sufficient to provide a broad description of each main alternative and the key issues associated with each, showing how environmental considerations were taken into account in deciding on the selected option. A detailed assessment (or 'mini-EIA') of each alternative is not required."*
>
> (Section 3.4.1)

The Guidelines also state that the range of alternatives considered may include the 'do-nothing' alternative.

Accordingly, this chapter of the EIAR provides an outline of the main alternatives examined during the design phase. It sets out the main reasons for choosing the development as proposed, taking into

account and providing a comparison on the environmental effects. The assessment of alternatives is considered under the following headings:

i. Do Nothing Alternative
ii. Alternative Use
iii. Alternative Locations
iv. Alternative Project Design (3 no. alternative scenarios)
v. Alternative Processes

Notwithstanding the above, pursuant to Section 3.4.1 of the 2022 EPA Guidelines, the consideration of alternatives also needs to be cognisant of the fact that *"in some instances some of the alternatives described below will not be applicable – e.g. there may be no relevant 'alternative location'…"* The Guidelines are also instructive in stating: *"Analysis of high-level or sectoral strategic alternatives cannot reasonably be expected within a project level EIAR… It should be borne in mind that the amended Directive refers to 'reasonable alternatives… which are relevant to the proposed project and its specific characteristics'"*.

3.2 Consideration of Alternatives

3.2.1 Do Nothing

3.2.1.1 Actual Do Nothing

The 'Do-nothing' alternative is a general description of the evolution of the key environmental factors of the site and environs if the proposed project did not proceed. Each Chapter of this EIAR includes a description of the 'Do Nothing' alternative and should be referenced in conjunction with this Chapter.

In general, if the proposed development is not realised, it is anticipated that the proposed development site will remain in its current condition in the short to medium term and will remain in agricultural use.

However, in the absence of the proposed development progressing, it is likely that another residential proposal would be progressed on the site in the short to medium term, having regard to the location of the proposed development site within the existing built-up area of Dundalk, its residential zoning, the urgent requirement for additional zoned lands and the critical need for housing.

3.2.2 Alternative Locations

The EPA Guidelines recognise that it is not always necessary or appropriate to consider alternatives which have already been addressed at a higher level i.e. at the plan making stage.

The location of the proposed development has been determined by the policy framework set out in the Louth County Development Plan 2021-2027 (CDP).

> *"In accordance with the RSES, a key priority of the Plan is to promote the **continued sustainable and compact growth of Dundalk** as a regional driver of **city scale with a target population of 50,000 by 2031**. This will be supported by*

*objectives to regenerate the town centre, **promote compact growth in the town's hinterlands**, and enhance the role of Dundalk as an employment centre on the Dublin-Belfast Economic Corridor…*

*Residential Development: The s**uccess of Dundalk as a self-sustaining Regional Growth Centre will be dependent on the delivery of a minimum 30% compact growth,** through regeneration and redevelopment of vacant, infill/brownfield sites in the town centre, **other character areas** and in Mount Avenue. Development of these lands will therefore be a central tenet of the Urban Area Plan (UAP) / Local Area Plan (LAP)."*

(Source: Louth County Development Plan Section 1.2.2, Page 1-6)

Section 1.6 of the CDP sets out the Strategic Vision for County Louth, as below, and notes that 'no individual or social group is excluded':-

Strategic Vision

"Promote County Louth, in particular the Regional Growth Centres of Drogheda and Dundalk, as uniquely attractive places in which to live, work, visit and do business and where the quality of employment and educational opportunities, natural and built environment, cultural experiences and provision of inclusive communities are all to the highest standards, while transitioning to a low carbon and climate resilient society."

The CDP includes 19 Strategic Objectives to support the realisation of this Vision, with the following of particular relevance to Dundalk and the proposed residential development:-

Strategic Objective	
SO 1	Realise the **potential and promote the development and growth** of County Louth through harnessing the **economic and employment potential** of the competitive advantages of the County. This includes its **strategic location, connectivity and accessibility** to external markets and having regard in particular to **the role of Drogheda and Dundalk as Regional Growth Centres** located on the Dublin-Belfast Economic Corridor
SO 2	**Support and promote the role of Drogheda and Dundalk as key designated Regional Growth Centres** with **high levels of self-sustaining employment and services**, to act as **regional economic drivers**, playing a **significant role for a wide catchment area** and to help achieve a more **coordinated and sustainable settlement and travel pattern** across the region.
SO 3	**Direct new development in accordance with the Core and Settlement Strategies**, which will provide for the sustainable development of the County for the period 2021-2027 and beyond and in accordance with the principles of compact growth, consolidation and regeneration
SO 8	**Develop and support vibrant, inclusive, sustainable and healthy communities** in Louth where people can **live, work, invest and visit**, enjoying access to a wide range of community, health and educational facilities and amenities, suitable for all ages and needs, in both urban and rural areas, thereby supporting a **high quality of life for all to enjoy**

Chapter 2 of the CDP sets out the Council's Core Strategy "*The Core Strategy facilitates and promotes a more consolidated compact urban form and ensures that future growth is based on the principles of*

sustainable development, delivering a high quality living and working environment meeting the needs of all residents."

Dundalk is identified as the first tier in the settlement hierarchy, reflecting its designation in the RSES as A Regional Growth Centre, with a target population of 50,000 by 2031 to city scale.

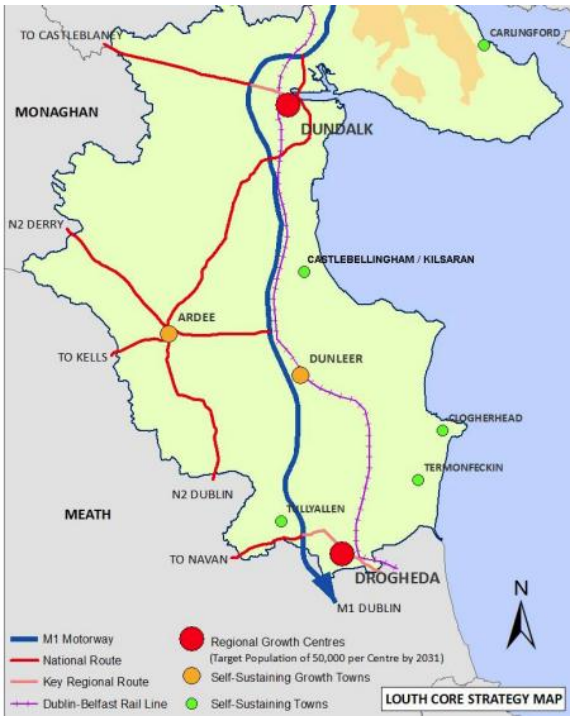

Figure 3-1 Core Strategy Map (Louth County Development Plan 2021-2027)

During the course of preparing the current CDP, a review of residentially zoned lands was undertaken as follows:-

> *"With the quantum of residentially zoned lands available in excess of that required for the anticipated population growth during the life of this Plan,* ***an analysis of the undeveloped residentially zoned lands was carried out****.* ***Based on this analysis****, which took account of the* ***location of the land*** *relative to the town centre,* ***public transport,*** *and* ***local facilities****, and the* ***availability of services and infrastructure*** *required to service the lands,* ***the lands were prioritised and ranked accordingly****. Any* ***excess lands have been placed in a strategic reserve and will not be available for development during the life of this Plan****."*
>
> *(Emphasis Added. Source: CDP Section 2.14.5, page 2-43)*

The subject lands were included in this analysis; they were not considered to be 'excess lands' and remained zoned A2 New Residential Phase 1 - *"To provide for new residential neighbourhoods and supporting community facilities."*

The central portion of the subject lands are zoned H1 Open Space - *"To preserve, provide and improve recreational amenity and open space."*

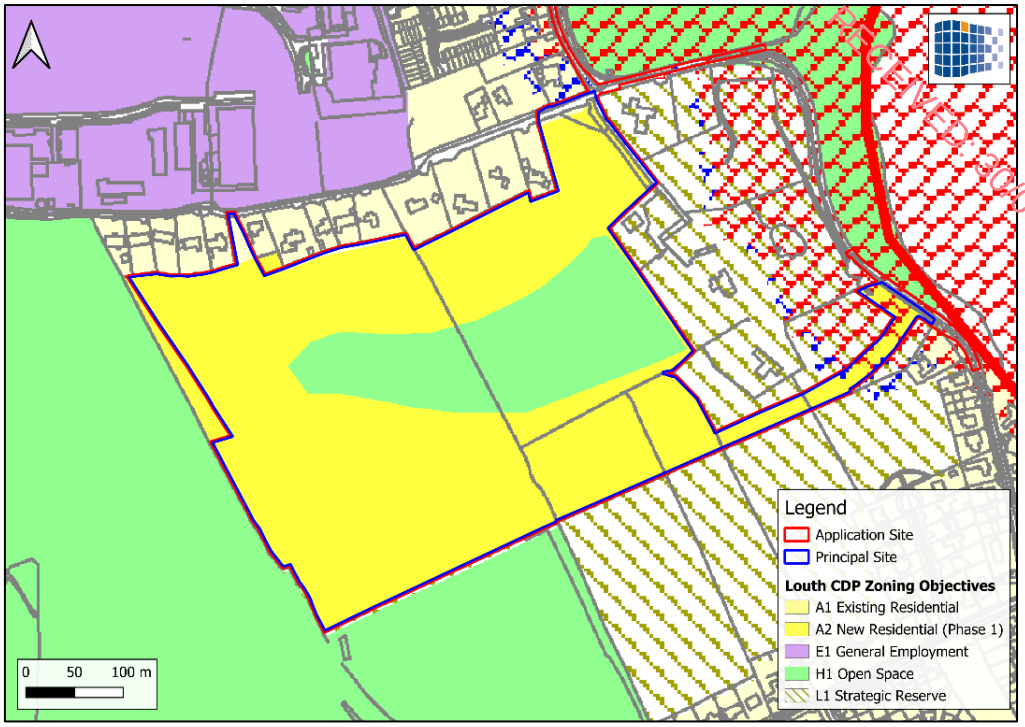

Figure 3-2 Zoning of Application Site (Prepared by MHP GIS Team. Basemap - Louth CDP).

As the development of this site for the proposed land uses has been identified at a local and national scale in the County Development Plan, in line with the National Planning Framework, no alternative sites were considered in this EIAR.

3.2.3 Alternative Uses

3.2.3.1 Relevant Development Plan

The primary determinant of suitable uses is established in the site's zoning. The proposed development site is zoned A2 – New Residential Phase 1, *"To provide for new residential neighbourhoods and supporting community facilities."*

The proposed crèche facility and all proposed residential units are located within A2-zoned lands, in addition to public open spaces and circulatory roads. These uses are "generally permitted" under the "A2 - New Residential - Phase 1" land-use zoning objective.

Table 3-1 A2 - New Residential Phase 1: Land Use Zoning Acceptability

A2 - New Residential - Phase 1	
Generally Permitted	Allotments, B&B/ Guest House, **Childcare Facility**, Community Facility, Education Facility (Primary or Second Level), **E- Charging Facility**, Home Based Economic Activities, Nursing Home, **Park/Playgrounds**, Place of Worship, Recreational/Amenity Open Space, Recreational/Sports Facility, **Residential,** Residential Institution, Retirement Village, Sheltered Accommodation, Third Level Student Accommodation, Traveller Accommodation, **Utilities.**

Open for Consideration	Coffee Shop/Tea Room, Cultural Facility, Healthcare Practitioner, Restaurant, Shop ≤200m², Takeaway/Fast Food Outlet, Telecommunications Structures, Veterinary Surgery.

The LCDP provides further guidance on A2 zoned lands:

> *"Any development shall have a high quality design and layout with an appropriate mix of housing and associated sustainable transport links including walking, cycling, and public transport to local services and facilities."*
>
> (Louth County Development Plan 2021-2027, Section 13.21.6)

The central portion of the subject lands are zoned H1 – Open Space, *"To preserve, provide and improve recreational amenity and open space."* The CDP indicates the following uses generally permitted and open for consideration on these lands:-

Table 3-2 H1 Open Space: Land Use Zoning Acceptability

H1 – Open Space	
Generally Permitted	**Cycleway/Walkway trails**, **Park/Playgrounds**, **Recreational/Amenity Open Space**, Recreational/Sports Facility
Open for Consideration	Allotments, Bring Banks, Coffee Shop/Tea Room, Car Park for recreational purposes, **Community Facility**, **E- Charging Facility**, Restaurant, Recycling Facility (Civic & Amenity), Telecommunications Structures, **Utilities.**

Having regard to the permissible and open for consideration uses, the reasonable alternative scenarios for development of the proposed development site are listed in the following Table having regard to the Residential and Open Space zoned lands.

Table 3-3 List of Reasonable Alternative Uses

A2 - New Residential - Phase 1	H1 – Open Space
i. Nursing Home ii. Recreational / Sports Facility iii. Residential institution iv. Retirement Village v. Sheltered Accommodation vi. Third Level Student Accommodation vii. Traveller Accommodation viii. Education facility ix. Mix of the above and smaller uses as listed in Table 3-1	i. Recreational / Sports Facility ii. Coffee Shop / Tea Room iii. Restaurant iv. Bring Banks / Recycling Facility v. Mix of the above and smaller uses as listed in Table 3-1

The proposed development is in accordance with the permissible uses and open to consideration uses attached to these zonings. In principle, an application for any combination of the uses listed above could be progressed on the site, subject to compliance with other policies and objectives in the CDP. Having regard to the location of the site within the urban area of Dundalk, the planning history of the site, including an SHD approval for 483 dwellings and a creche (ABP 304782), a more recent LRD application for 502 dwellings (and although not permitted, it was not refused on the grounds of use -

Reg. Ref. 23/60476, ABP Ref. 319077), and the critical need for additional housing not just in Dundalk but nationally, the proposed housing tenure and mix, and the creche, was deemed the most appropriate use for these residentially zoned lands.

3.2.4 Alternative Design (including size & scale)

This development was arrived at following detailed design and has evolved as an iterative process within the Design and Environment Team and in response to feedback from the Local Authority through the LRD process. The main alternatives considered in terms of design are outlined below, with input from the project architects – JFA Architects - and the main reasons for not progressing with the options are outlined. The preferred design is described in Chapter 2 of this EIAR.

3.2.4.1 Alternative Design No. 1 – Extant Permission

This alternative is a design previously submitted and approved for this site under ABP 304782. This development comprised a Strategic Housing Development (SHD) consisting of 483 no. residential units, a childcare facility, a new access junction to the Blackrock Road and all ancillary development

The housing mix permitted included 258 no. houses and 225 no. apartments, at a density of 35 units per hectare (uph).

The permission was granted to a previous owner of the site and on acquisition, the landowner / applicant deemed the scheme to be no longer be viable with a move away from apartment units and an increase in houses consider to be more appropriate for the location and meeting market requirements, therefore maximising the use of zoned development land.

This design also fails to meet the standards set out in the *Sustainable Residential Development and Compact Settlements Guidelines, 2024*, which were adopted since this design was developed and approved.

3.2.4.2 Alternative Design No. 2 – Previous LRD Application

Permission was sought under Reg. Ref. 23/60476 for a Large-Scale Residential Development of 502 no. residential units and a creche, along with vehicular, cyclist and pedestrian access and all ancillary development. The housing mix significantly changed, with 450 no. houses and 52 no. 1 bed maisonettes (apartments) included, at a density of 37.69uph.

This application was refused by the council in relation to:-

- wastewater disposal, surface water drainage, water flow rate calculations and biodiversity.
- potential impact of the development on Natura 2000 sites.
- lack of universally designed units

The application was appealed to An Bord Pleanála (ABP Ref. 319077) and after considering all available information, the Board refused permission for one reason relating to wastewater treatment and capacity in the public system.

3.2.4.3 Alternative Design No. 3 - Proposed Development

The application now being considered, as detailed in Chapter 2 of this EIAR, has been arrived at having regard to the previous schemes on the site.

The positives from the previous LRD scheme have been carried forward into the proposed development, including the access road, main internal circulation routes, public open space provision, building heights etc, with the scheme now proposed being updated to respond to the reasons for refusal and changes in guidelines and housing standards introduced since the previous schemes.

The number of units remains the same but with the application of the *Sustainable Residential Development and Compact Settlements Guidelines, 2024,* it was possible to increase the size of the 2,3 and 4 bed units by 15% when compared to the previous alternative design.

The housing mix is largely similar with 462 no. houses and 40 no. 1 bed maisonettes (apartments) proposed, and the density is 37.9 uph. The percentage of universal design units has also been increased to greater than 30%, in line with the CDP requirements.

There are no changes to the principles for the disposal of wastewater, with waste to be pumped along Blackrock Road and Tandy's Lane to discharge to the existing public network at Coes Road. However, since the previous application was refused, Uisce Eireann have issued the following to the applicant / landowner:-

- Confirmation of Feasibility of the Proposed Development
- Statement of Design Acceptance for the Proposed Development.

The applicant / landowner also has a Connection Agreement (signed and paid for) with Uisce Eireann for 200 units at the Site, with a further Agreement in the final stages for another 283 no. units at the Site (with the number of units based on the 483 no. units permitted previously under SHD 304782 (refer to alternative design 1 above).

3.2.5 Alternative Processes

This is an urban residential development, and therefore, the consideration of alternative processes relates to the methods of construction to be used in the development. The *Outline Construction Environmental Management Plan* (prepared by DOBA) details the construction processes likely to be employed. The proposed construction works comprise relatively standard building construction processes. As such there are no specific alternative construction processes identified in this EIAR.

3.3 Difficulties Encountered

Each Chapter of this EIAR includes a section on Difficulties Encountered and a description of same where encountered.

3.4 Conclusion

On the basis of the foregoing, it is considered that all reasonable alternatives to the project are considered and no alternatives have been overlooked which would significantly reduce or further minimise environmental effects.

Having considered all alternatives, the final design chosen by the developer i.e. the project as presented is deemed to be the most suitable project for the site.

Haggardstown LRD

Dundalk, Co. Louth

Main Statement

Volume II

CHAPTER 4

Population and Human Health

May 2025

McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

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4 Population & Human Health

4.1 Introduction

According to the European Commission's Environmental Impact Assessment of Projects: Guidance on the Preparation of the Environmental Impact Assessment Report (2017), human health is; *"a very broad factor that would be highly project dependent. The notion of human health should be considered in the context of the other factors in Article 3(1) of the EIA Directive and thus environmentally related health issues (such as health effects caused by the release of toxic substances to the environment, health risks arising from major hazards associated with the Project, effects caused by changes in disease vectors caused by the Project, changes in living conditions, effects on vulnerable groups, exposure to traffic noise or air pollutants) are obvious aspects to study. In addition, these would concern the commissioning, operation, and decommissioning of a Project in relation to workers on the Project and surrounding population."*

The Environmental Protection Agency (EPA) Guidelines on the Information to be contained in Environmental Impact Assessment Reports (2022) advise that "*in an EIAR, the assessment of impacts on population and human health should refer to the assessments of those factors under which human health effects might occur, as addressed elsewhere in this EIAR e.g. under the environmental factors of air, water, soil etc.*"

This chapter addresses the likely significant environmental impacts of the proposed development on population and human health. It is noted that other chapters of the EIAR also deal with likely significant environmental effects on population and human health arising from traffic and transportation, air quality and climate, noise and vibration, landscape and visual, material assets: utilities and the risk of major accidents and/or disasters and those chapters should be referenced in conjunction with this chapter of the EIAR.

4.2 Expertise and Qualifications

This chapter was prepared by Louise O'Leary, Associate Director at McCutcheon Halley Chartered Planning Consultants. Louise has a Masters in Regional and Urban Planning (BA MRUP Hons), obtained in 2005, and a Diploma in EIA Management, obtained in 2014, both from University College Dublin. Louise is also a Corporate Member of the Irish Planning Institute.

With almost 20 years' experience in consultancy, Louise has directed and contributed to the preparation of environmental impact assessments for a variety of projects including residential, mixed use and infrastructural developments.

4.3 Proposed Development

A full description of the proposed development is provided in Chapter 2 of this EIAR. The following is a summary of aspects of the proposed development which are relevant to this chapter:

- 502 no. residential units comprising 1, 2, 3 and 4 bed units in a mix of maisonettes, terraced and semi-detached units, with 1 no. detached bungalow unit. The residential units are two and three storey in height, excluding the 1 no. bungalow.
- Two storey Creche facility New vehicular entrance off Blackrock road, incorporating a new bus stop, with pedestrian and cycle access also from Bóthar Maol and active travel route through the site
- Associated public open spaces, landscaping, roads, cycleways, residents and visitor parking, drainage, public lighting etc. and associated site and development works.
- Undergrounding of the existing overhead electricity lines currently traversing the site.

4.4 Methodology

Publications and other data sources consulted include:

- National Planning Framework First Revision (2025) (Government of Ireland, 2018)
- Eastern & Midland Regional Spatial and Economic Strategy 2019-2031
- Louth County Development Plan 2021-2027
- Dundalk Local Area Plan 2025-2031
- Central Statistics Office (CSO) website (cso.ie)
- Department of Education (DE) website (education.ie)
- GeoDirectory-GeoFindIT App
- Pobal website (maps.pobal.ie)
- Health and Safety Authority website (hsa.ie)

Additionally, the following reports prepared by McCutcheon Halley Planning Consultants and submitted with this application under separate cover were consulted:

- Community and Social Infrastructure Audit
- Childcare Demand Assessment
- School Demand Assessment
- Planning Statement

This chapter has been prepared having regard to the following guidelines:

- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (Department of Housing, Planning & Local Government, 2018)
- Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report (European Commission, 2017);
- Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EPA, 2022)

The impact assessment section of this chapter follows the terminology (where applicable) used in the EPA Guidelines as set out in Chapter 1 of this EIAR.

4.5 Baseline Environment

4.5.1 Application Area

The proposed development site lies within the Louth County Council administrative area. The proposed development site is located within the Electoral District (ED) of Haggardstown and within the CSO boundary of Dundalk Urban Area. The ED and Dundalk Urban Area are areas where census data is published, and they provide a detailed analysis of population and demographic statistics and trends. The application area is approximately 18.54 ha and proposes to deliver 502 residential units and a creche. The site is generally located south of Bóthar Maol west of Blackrock Road (R172).

The application site also extends north to Finnabair Industrial Estate, along Blackrock Road and Tandy's Lane; and east along Blackrock Road for varying services infrastructure requirements.

The principle site at Haggardstown is a greenfield area comprising two irregularly shaped agricultural fields, featuring hedgerows, trees, walls, and scrub vegetation. Some ground disturbance and construction activity occurred on the site in December 2024 and January 2025 under a previously permitted SHD permission.

Figure 4-1 Study Area and Surrounding Context (Source: MHP GIS Team)

4.5.2 Land Use Zoning

The majority of the proposed development site is zoned A2 – New Residential Phase 1, in accordance with the Louth County Development Plan 2022-2027 (LCDP), see Figure below. The objective of this zoning is: "*To provide for new residential neighbourhoods and supporting community facilities.*"

The central portion of the subject lands are zoned H1 – Open Space, with the following objective: *"To preserve, provide and improve recreational amenity and open space."*

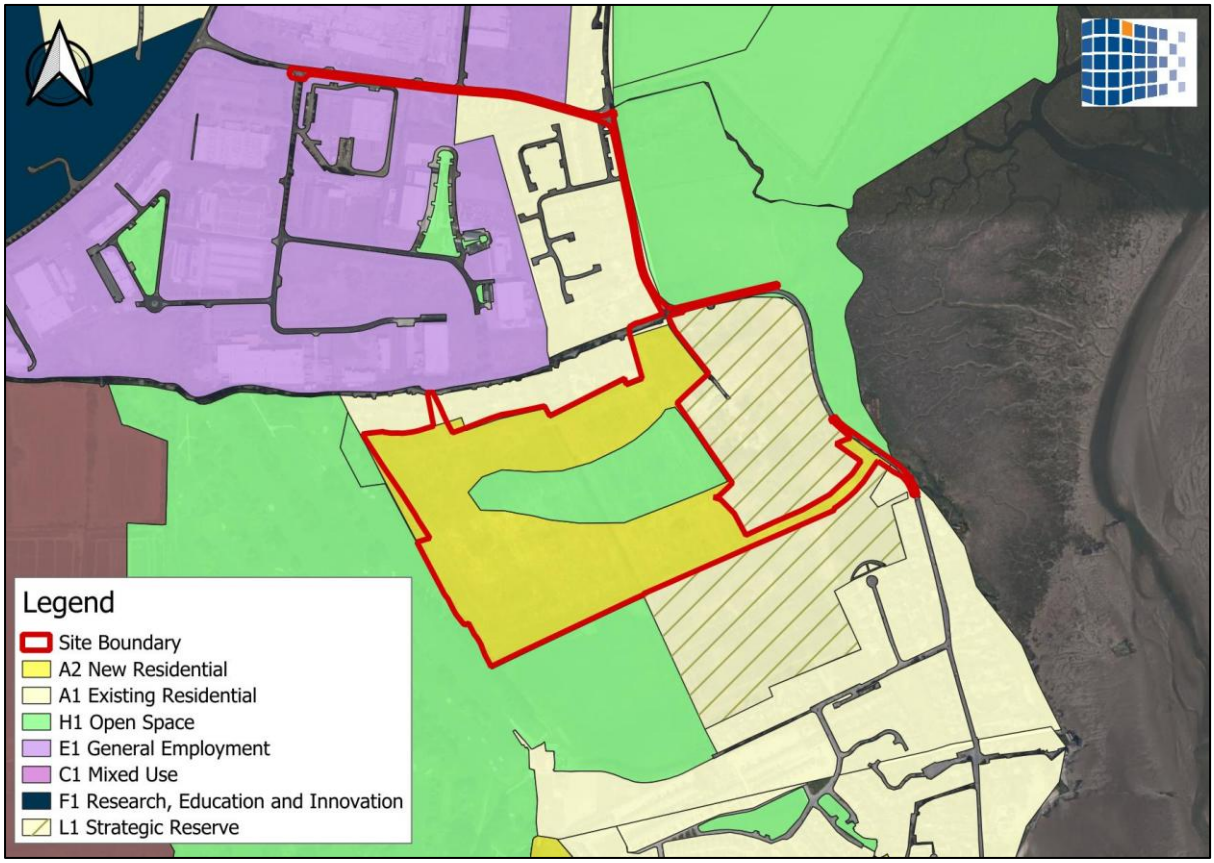

Figure 4-2 Site Zoning from the Development Plan (outlined in red).

The Dundalk Local Area Plan purports to zone the subject lands as "L1 Strategic Reserve". This conflicts with the County Development Plan. The zoning, policy, objectives, text and mapping in the County Development Plan takes precedence over same in the LAP. This is confirmed in the LAP – Refer Policy Objective DM3. This is also a requirement of section 18(4)(b) of the Planning and Development Act 2000 (as amended), which provides that where any provision of an LAP "conflicts with" the provisions of the development plan, the provision of the local area plan "shall cease to have effect". Therefore, the lands continue to be zoned as "A2 New Residential Phase 1" under the CDP at this time. For completeness, the validity of the purported change made in the Dundalk Local Area Plan has been questioned in legal proceedings bearing the name and title Glenveagh Homes Limited v. Louth County Council, High Court 2025 570 JR. The proceedings were commenced on 29 April 2025, and remain pending.

4.5.3 Surrounding Land Uses

The site is bounded to the north by Bóthar Maol, a cul de sac with c.14 detached dwellings. Finnabair Industrial Estate bounds the northern side of Bóthar Maol.

To the east, 4 residential properties on larger plots, accessed from Blackrock Road (R172) back onto the site.

Lands to the south are agricultural with housing on Birches Lane beyond. Dundalk Golf Club adjoins the western boundary of the site.

The area has a number of local services located within proximity of the site including creches and recreational open spaces and convenience stores.

4.5.4 Transport and Accessibility

4.5.4.1 Pedestrian and Cycle Network

Existing footpaths are located along the surrounding road network, providing connectivity to Dundalk to the north and Blackrock Village to the south.

Currently, there is no dedicated cycle infrastructure surrounding the subject site. However, significant upgrades are proposed to enhance cycling connectivity in the area. The Blackrock to Dundalk Greenway, a key component of the Dundalk Flood Relief Scheme led by the Office of Public Works and Louth County Council, will introduce a coastal cycling and walking path along newly constructed flood defences, with construction expected to commence in 2027 pending necessary consents. Additionally, the National Transport Authority's 'Cycle Connects: Ireland's Cycle Network' initiative includes plans for a comprehensive cycling network across Louth and the 21 other counties outside the Greater Dublin Area. Following public consultation in November 2022, these routes are being progressively implemented from 2023, with completion targeted by 2030 under the National Development Plan 2021-2030. These developments promise to significantly improve safe and accessible cycling infrastructure around the site in the coming years

4.5.4.2 Road Network

Blackrock Road (R172) is located west of the site. This is a Regional Road that starts east from the R132 Dublin Road at Greengates, then turns north along the coast, passing through Blackrock. North of the site, it turns west along the Inner Relief Road to join the N52 in Dundalk.

4.5.4.3 Public Transport – Bus

Halpenny Travel's Route 169 provides regular bus service along the R172 Blackrock Road, connecting Blackrock and Dundalk. Operating Monday to Friday from 08:03 to 17:38, the route features 17 buses daily: 8 towards Dundalk and 9 towards Blackrock. Buses stop on demand, with a journey time of approximately seven minutes to Dundalk town centre. There are no physical bus stops in the vicinity of the site, however Halpenny Travel has confirmed that the bus stops on demand.

Connecting Ireland: Rural Mobility Plan proposes a new Local Route (no.168) which would see an increased frequency of buses between Drogheda and Dundalk, running along the R172 by the site.

The Dundalk Local Transport Plan sets out a proposed new urban bus network throughout Dundalk, including a new DN4 service between Clarke Station and Blackrock, which would travel along the R617 past the site. This would have an expected frequency of 20-30 minutes during peak periods

4.5.4.4 Public Transport – Rail

Dundalk railway station, located about 5km northwest of the site, is on the Dublin Connolly to Belfast rail line. It offers regular services throughout the week, with nine trains per day in both directions, running every 90 to 120 minutes. The journey takes approximately 57 minutes to Dublin Connolly and 73 minutes to Belfast.

4.5.5 Population & Demographic Profile

This section reviews the demographic characteristics, population, and age structure of the surrounding area. For this assessment, the extent of the study area of the Electoral Division (ED) of Haggardstown and the CSO Urban Area boundary of Dundalk has been analysed, see **Figure 4-3** following. There are no guidelines that stipulate the zone of influence (ZoI) of the study area. Professional judgement is used and the rationale for the selection of this radius is based on the need to understand the capacity of the existing housing and employment profile in the local area.

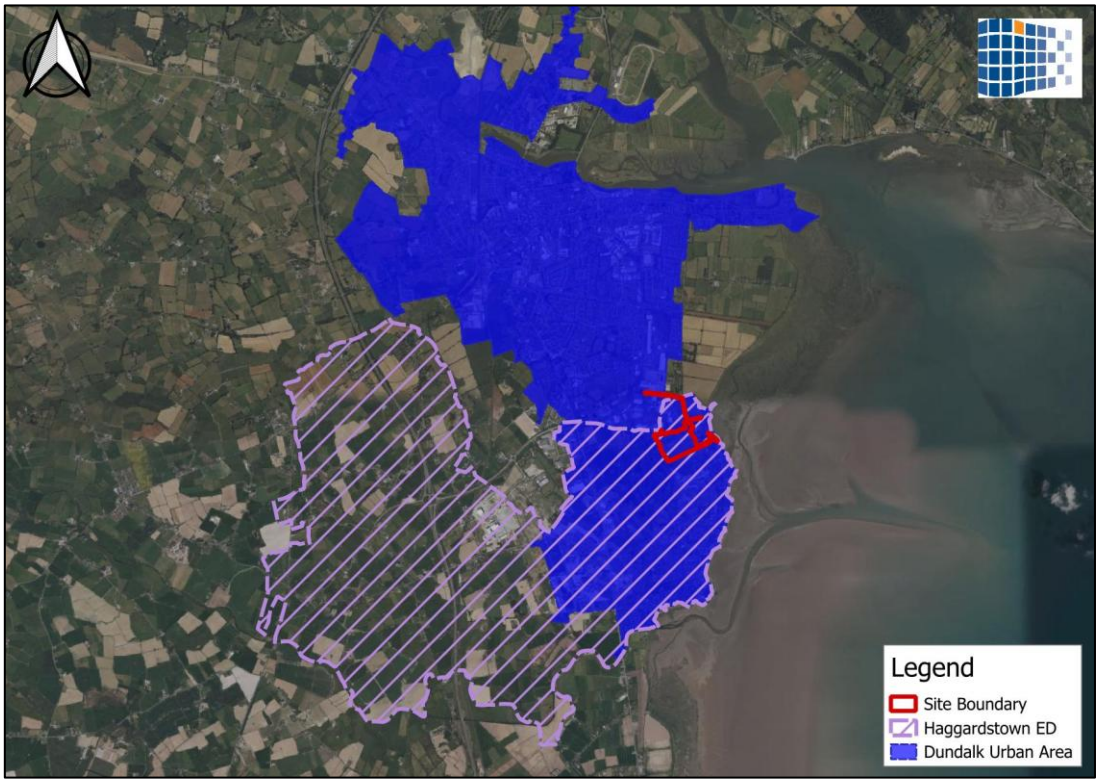

Figure 4-3 Haggardstown Electoral Division and Dundalk Urban Area in respective to subject site (MHP GIS Team)

The CSO data shows that Haggardstown ED population was 9,301 persons in 2022. This represents an increase of 2,369 (approx. 34.17%%) from the 2016 Census. This increase is roughly four times above the Dundalk Urban Area and Louth County's growth rates of 8.4% and 8.6%, respectively, for the same period. See Tables below for a more in depth breakdown of the population within the area.

Table 4-1 Haggardstown ED, Dundalk Urban Area & Wider Area Population (Source: CSO)

Name	CSO 2011 Population	CSO 2016 Population	CSO 2022 Population	Change 2016-2022	% Change 2016-2022
Haggardstown ED	6,390	6,932	9,301	2,369	34.17%
Dundalk Urban Area	31,149	128,884	139,703	10,819	8.4%
Louth	122,897	128,884	139,703	10,819	8.6%
Ireland	4,588,252	4,761,865	5,149,139	387,274	8.1%

Table 4-2 Breakdown of the Population by Age Cohort (Source: CSO)

Age Cohorts	Dundalk Urban Area		Louth County		Haggardstown ED	
	Population	Percentage	Population	Percentage	Population	Percentage
0-4 years	2,778	6.4%	8,260	5.9%	646	6.9%
5-9 years	3,196	7.4%	9,848	7.0%	817	8.8%
10-14 years	3,241	7.5%	10,986	7.9%	755	8.1%
15-19 years	2,936	6.8%	9,974	7.1%	584	6.3%
20-24 years	2,874	6.7%	8,394	6.0%	409	4.4%
25-29 years	2,522	5.8%	7,219	5.2%	440	4.7%
30-34 years	2,955	6.9%	8,468	6.1%	676	7.3%
35-39 years	3,430	8.0%	9,998	7.2%	791	8.5%
40-44 years	3,393	7.9%	11,126	8.0%	716	7.7%
45-49 years	3,020	7.0%	10,325	7.4%	644	6.9%
50-54 years	2,630	6.1%	9,794	7.0%	555	6.0%
55-59 years	2,268	5.3%	8,333	6.0%	505	5.4%
60-64 years	2,048	4.8%	7,080	5.1%	409	4.4%
65-69 years	1,764	4.1%	6,078	4.4%	408	4.4%
70-74 years	1,475	3.4%	5,155	3.7%	359	3.9%
75-79 years	1,171	2.7%	4,074	2.9%	287	3.1%
80-84 years	747	1.7%	2,550	1.8%	153	1.6%
85+ years	664	1.5%	2,041	1.5%	147	1.6%
Total	43,112	100.0%	139,703	100.0%	9,301	100%

Based on the population breakdown of the areas, the average age in Haggardstown ED is approximately 36.8 years, while the average age in Dundalk Urban Area is slightly lower at 36.7 years. This indicates that both areas have a similar age distribution, with Haggardstown ED having a marginally older population on average. In contrast, Louth County has a higher average age of approximately 37.7 years.

4.5.6 Deprivation Index

The Pobal Deprivation Index is Ireland's most widely used social gradient metric, which scores areas in terms of affluence or disadvantage. The index uses information from Ireland's census, such as employment, age profile and educational attainment, to calculate this score. **Figure 4-4** below shows the level of affluence and deprivation at the ED level, according to the Pobal Haase Relative Deprivation Index. Scores range from -35 (Extremely Disadvantaged) to +35 (Extremely Affluent).

The overall score for Louth County following the 2022 Census was -3.59 ('Marginally below average'), Haggardstown ED was 5.13 ('Marginally above average')

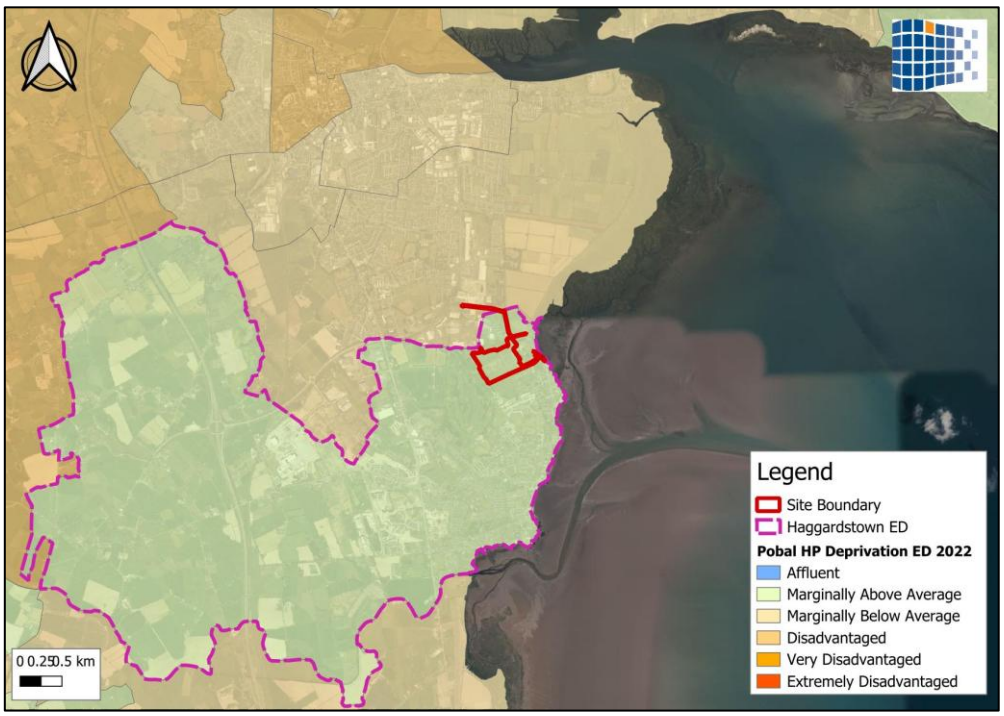

Figure 4-4 Deprivation Index (Source: MHP GIS Team)

4.5.7 Households

The total population and total households for Haggardstown ED, Dundalk Urban Area, Louth County administrative area and the State for 2022 are provided in **Table 4-3** below. In total, in 2022 there were 3,293 and 15,936 private households within the ED and Dundalk Urban Area, respectively. Overall, there was a higher proportion of 1- and 2-person households, and a lower proportion of 3-4- and 5 person households for Haggardstown ED and Dundalk Urban Area

Table 4-3 Census 2022, Persons Per Households

	Haggardstown ED		Dundalk Urban Area		Louth County	State
	Households	%	Households	%	% of Households	% of Households
1-person household	686	20.8%	4,074	25.6%	22.7%	23.1%
2-person household	959	29.1%	4,397	27.6%	27.0%	29.0%
3-person household	597	18.1%	3,007	18.9%	18.8%	17.9%
4-person household	604	18.3%	2,501	15.7%	17.6%	16.9%

5-person household	317	9.6%	1,274	8.0%	9.4%	8.9%
6-person household	88	2.7%	454	2.8%	3.3%	3.0%
7-person household	29	0.9%	140	0.9%	0.9%	0.8%
>7-person household	13	0.4%	89	0.6%	0.5%	0.4%
Total households	3,293	100.0%	15,936	100.0%	100.0%	100.0%

4.5.8 Housing Delivery

The revised National Planning Framework (NPF) aims to provide a strategic proposal for creating and designing a pathway for the development of the country up to 2040. To support the objective of compact growth, the NPF targets 40% of future housing development to occur within or adjacent to the existing footprint of urban areas, fostering sustainable communities and reducing urban sprawl

The revised NPF has set out new draft national objectives in relation to housing targets with Draft National Policy Objective 43 stating its plan to target the supply of housing to accommodate approximately 50,000 additional households per annum to 2040.

The Housing for All[1] - a New Housing Plan for Ireland (2021) is the government's housing plan to deliver an average of 33,000 new homes annually by 2030. According to the CSO, New Dwelling Completions Reports[2], 5,938 new dwellings have been completed over Quarter 1 (Q1) 2025, a rise of 2.0% on the same three months of 2024. Overall, 30,330 new dwellings were constructed in 2024 which is just below the annual target of 33,000. In addition, there were 32,525 new dwelling completions in 2023, which is approx. 1.4% below the Housing for All's annual target.

There are 3,598 and 17,470 no. residential units (including occupied and unoccupied dwellings) in Haggardstown ED and Dundalk Urban Area respectively according to the CSO on the Census night of 2022 The population and housing stock change for Haggardstown ED and Dundalk Urban Area between the 2016 and 2022 Censuses are shown below.

Table 4-4 Population and Housing Stock, Census 2016 and 2022 (Source: CSO)

	Haggardstown ED		Dundalk Urban Area	
	2022	**6-Year Change**	**2022**	**6-Year Change**
Population	9,301	34.2%	43,112	8.4%
Housing Stock	3,598	24.3%	17,470	6.8%

4.5.9 Typology and Tenure

At the 2022 Census, the vast majority of private households within both Haggardstown ED and Dundalk Urban Area, lived in a house or bungalow (c.96.5% and 91.0%, respectively). The proportion of permanent households occupying flats or apartments in Haggardstown ED, Dundalk Urban Area and County Louth was significantly less than the proportion occupying flats or apartments for the State.

[1]Housing for All - a New Housing Plan for Ireland (Department of Housing, Local Government and Heritage,2021)

[2] Accessible via https://www.cso.ie/en/statistics/buildingandconstruction/newdwellingcompletions/

Table 4-5 Private Households by Housing Typology, Census 2022 (Source: CSO)

	Haggardstown ED	Dundalk Urban Area	Louth County	State
House/Bungalow	96.5%	91.0%	92.6%	86.7%
Flat/Apartment	3.5%	8.8%	7.2%	13.0%
Bed-Sit	0.0%	0.1%	0.0%	0.1%
Caravan/Mobile home	0.0%	0.1%	0.2%	0.2%

4.5.10 Owner Occupancy

Across Haggardstown ED, 74.2% of the housing stock is owner occupied and 21.4% is rented either through private landlord or from a public body as shown below.

Table 4-6 Private Households by Type of (Source: CSO)

	Haggardstown ED	Dundalk Urban Area
Owned with mortgage or loan	40.0%	28.1%
Owned outright	34.2%	29.0%
Owned (Subtotal)	**74.2%**	**57.1%**
Rented from private landlord	9.4%	19.4%
Rented from Local Authority	9.4%	13.9%
Rented from voluntary/co-operative housing body	2.6%	3.8%
Rented (Subtotal)	**21.4%**	**37.1%**
Occupied free of rent	1.1%	1.3%
Not stated	3.4%	4.4%

4.5.11 Employment

The seasonally adjusted unemployment rate for March 2025 was 4.0%, raised from 3.9% in February 2025 and level with 4.0% in January 2025.

At present, the CSO produces a supplementary measure of unemployment in parallel with the routine Monthly Unemployment Estimate. The methodology for the Monthly Unemployment Estimates involves forecasting the number of unemployed persons using the trend in the recipient Live Register series. The Department of Social Protection provides Working Age Income support to people arriving in Ireland from Ukraine under the Temporary Protection Directive. The Live Register series includes recipients of these supports who have met the relevant criteria. This has impacted the numbers of unemployed, primarily females, in these monthly estimates. The CSO statistical release on monthly figures issued in March 2025 in respect of February 2025 stated the following:

> *"The seasonally adjusted number of people unemployed was 114,800 in March 2025, compared with 112,900 in February 2025. There was a fall of 5,600 in the seasonally adjusted number of people unemployed in March 2025 when compared with March 2024.*

The seasonally adjusted number of unemployed males rose to 59,000 in March 2025, compared with 58,200 in February 2025. The seasonally adjusted number of unemployed females in March 2025 was 55,800, up from 54,700 in February 2025."

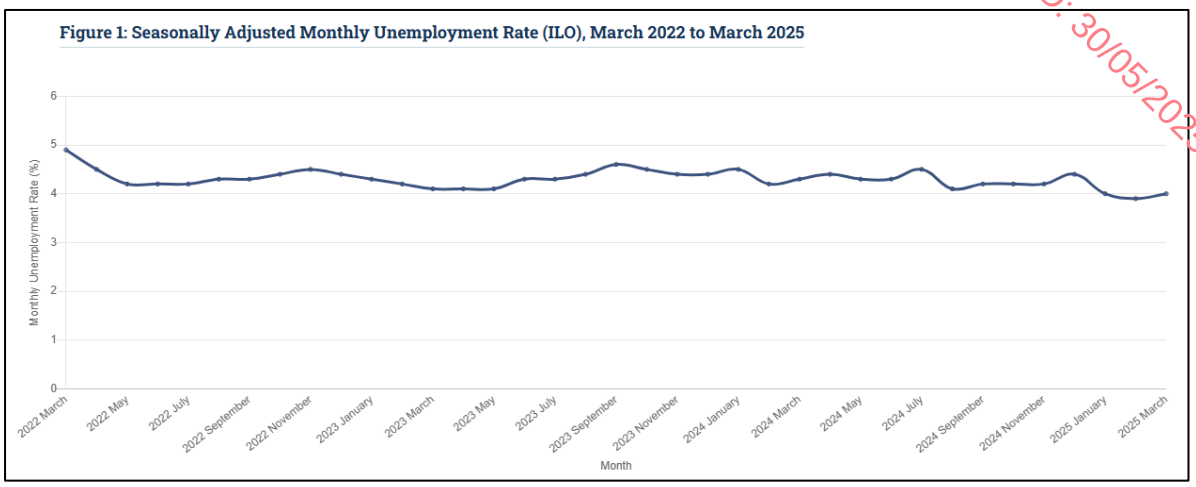

Figure 4-5 Live Register Seasonally Adjusted Figures. (Source: CSO)

The latest Live Register data for County Louth[3] shows that the total number of persons on the Live Register was 6,937, a decrease of 211, or 3.04%, over the month from February 2025 to March 2025; this represents a decrease of 513, or 7.6%, over the year from March 2024 to March 2025.

The CSO's monthly unemployment data sets are available only at a national level, which precludes detailed analysis of the unemployment rate in Haggardstown ED and Dundalk Urban Area.

The industries in which people are engaged within the ED and Urban Area are illustrated in **Table 4-7**. The majority of persons at work within the ED are occupied in Transport and Communications (28.3%), Commerce and Trade (28.1%), and Professional Services (12.8%).

Table 4-7 Persons at Work by Industry, Census 2022 (Source: CSO)

Industry	Haggardstown ED	Dundalk Urban Area	Louth County	State
Agriculture forestry and fishing	0.7%	0.3%	2.0%	3.5%
Building and construction	4.4%	3.8%	5.8%	5.8%
Public administration	11.2%	11.9%	12.0%	11.8%
Transport and communications	28.3%	27.7%	25.3%	23.8%
Other	8.3%	7.5%	8.1%	9.2%
Manufacturing industries	6.1%	5.6%	5.5%	5.7%
Commerce and trade	28.1%	24.3%	25.3%	24.5%
Professional services	12.8%	18.9%	16.0%	15.8%

[3] https://data.cso.ie/table/LRM15

4.5.12 Social Infrastructure

Social infrastructure includes a wide range of services and facilities, including education, health, community, cultural, play, faith, recreation and sports facilities that contribute to the quality of life. This planning application is accompanied by a *Social Infrastructure Audit (SIA), a Childcare Demand Report (CDR) and a School Demand Assessment (SDA),* which should all be read in conjunction with this chapter. In summary, these reports confirm that sufficient facilities are available in the area and that these facilities can adequately provide for the new population anticipated as part of this development.

4.5.12.1 Education

In relation to primary and post-primary school facilities, there are 28 no. primary and 8 no. post primary schools within the 10km catchment area, see Figure 4-6. Table 4-8 includes the full list of primary and post-primary schools located within 10km of the proposed development site.

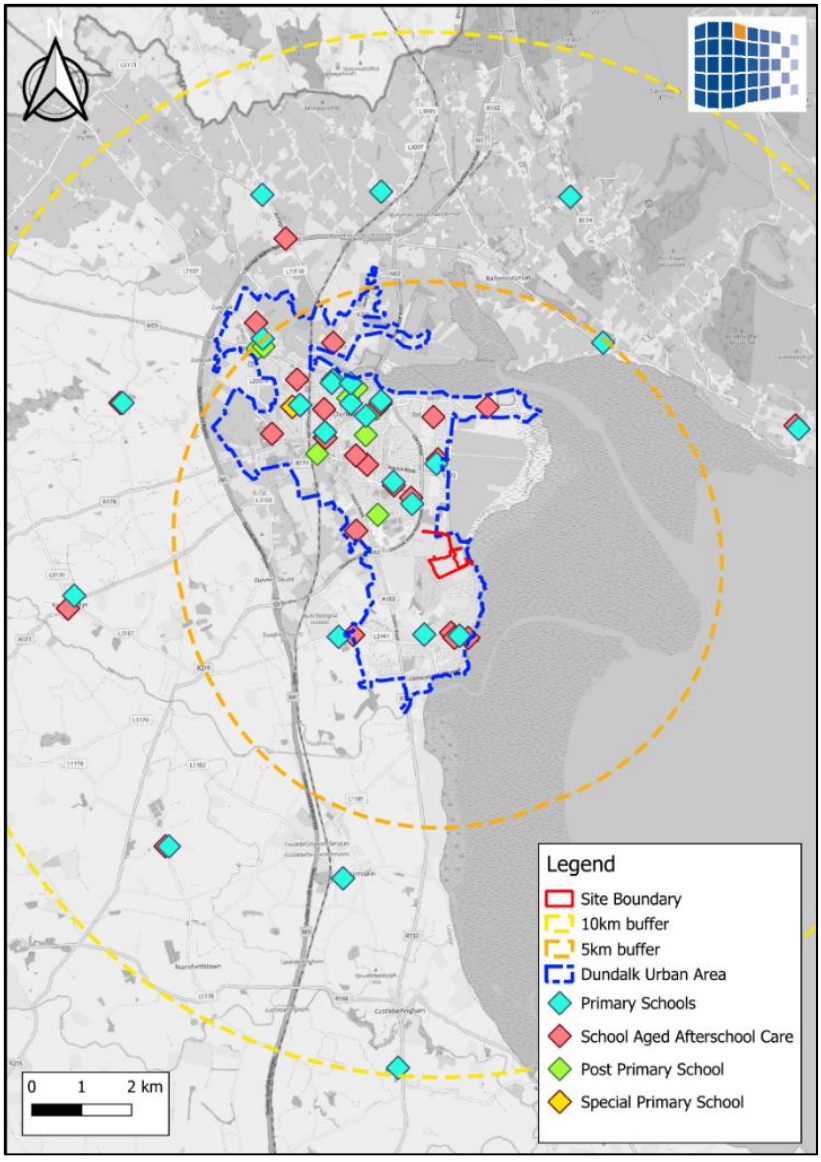

Figure 4-6 Schools in Study Area

Table 4-8 Schools in Study Area

No.	Educational Establishment	Student Enrolment 2023/2024
Primary School		
1	Dulargy Mixed N S	162
2	Dun Dealgan N S	91
3	Sn Chill Sarain	169
4	Castletown Rd Convent	188
5	Knockbridge Mixed N S	305
6	S N N Maolmhaodhagh C	250
7	S N N Maolmhaodhagh N	237
8	Scoil Na Gcreagacha Dubha	461
9	Bellurgan N S	119
10	St Nicholas Monastery Ns	154
11	Scoil Mhuire Gan Smál	209
12	Dromiskin Mixed N S	244
13	C.B.S. Primary	455
14	Scoil Dairbhre Mixed	86
15	Scoil Fhursa	229
16	S N Muire	178
17	Scoil Phadraig Naofa	209
18	S N San Nioclas	159
19	Faughart Community National School	89
20	S N N Maolmhaodhagh B	236
21	S N An Tslanaitheora B	153
22	S N An Tslanaitheora C	136
23	Scoil Mhuire Na Ngael	636
24	St Josephs N S	575
25	Gaelscoil Dhun Dealgan	212
26	S.N Eoin Baiste	157
27	St. Francis National School	429
28	Réalt Na Mara School	468
Post-Primary School		
1	Colaiste Rís	610
2	St Mary's College	867
3	De La Salle College	741
4	St Vincent's Secondary School	905
5	St Louis Secondary School	492
6	Dundalk Grammar School	574
7	Ó Fiaich College	289
8	Coláiste Chú Chulainn	857

The *School Demand Assessment* (MH Planning) that accompanies the proposed development demonstrates that there is capacity within the catchment to cater for the school aged population generated by the proposed development.

4.5.12.2 Childcare

Twenty-eight childcare facilities were identified within Dundalk's Urban Area settlement boundary as defined by the 2022 CSO, see Figure 4-7 below.

The Childcare Demand Report, which accompanies this application under separate cover, establishes that there is an estimated demand for 1,325 childcare spaces in the Dundalk Urban Area. There are at least 1,285 places provided by existing and permitted facilities. Thus, there is an existing deficit in pre-school childcare within the study area.

The proposed development includes a two-storey crèche building measuring 570.7sq m gross floor area, and a secure outdoor play area. This facility will have capacity for c. 120 children. This means that the future demand arising from the proposed development (24 childcare spaces) can be comfortably accommodated, as outlined in Table 4-9 below. Consequently, the proposed childcare facility will include additional capacity for c. 96 children to cater to the wider area.

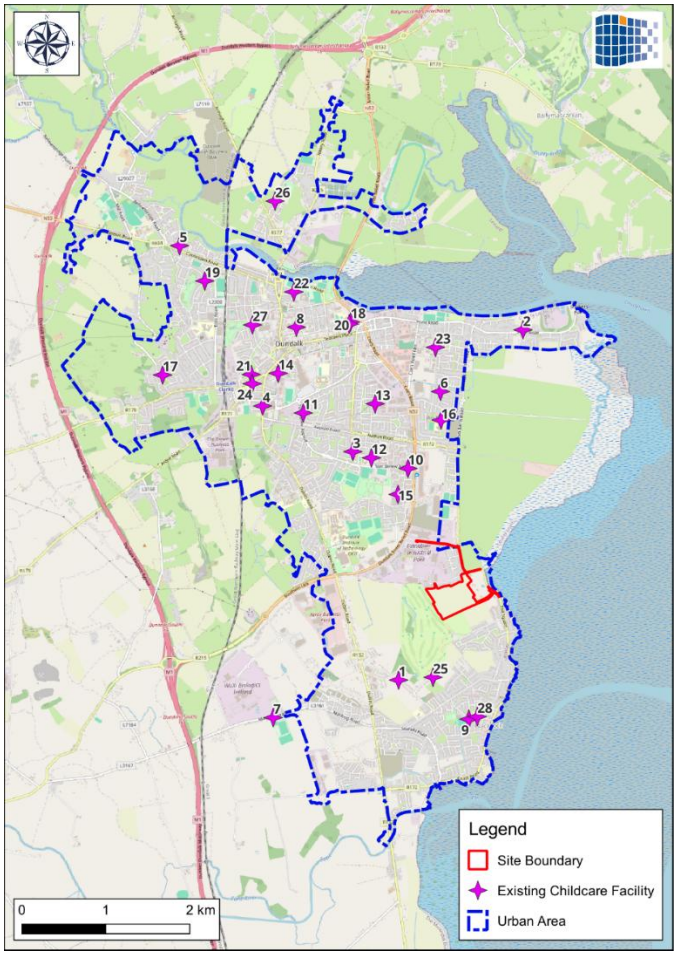

Figure 4-7 Existing Early Year Provider within Dundalk Urban Area (Sources: Tusla, MHP GIS Team)

Table 4-9: Childcare Facilities in the Study Area

No.	Name and Address	Age Profile and Service Type	Tusla Capacity
1	Blackrock Montessori Pre-School	3-6 Years Sessional	13
2	Ainedanbury Ltd T/A Bright Beginnings	2-6 Years Full Day, Part Time, Sessional	67
3	Claddaghs Treasures	2-6 Years Full Day	51
4	De La Salle Pre-School	2-6 Years Sessional	22
5	Dundalk Creche LTD - t/a ABC Childsplay	1-6 Years Sessional	43
6	Field of Dreams	2-6 Years Sessional	11
7	Little Oaks Early Years Limited	2-6 Years Full Day	44
8	Happy Days Pre-School (now CBS pre-school)	2-6 Years Sessional	44
9	Happy Dayz	3-6 Years Full Day, Sessional	25
10	Holy Family Parish Community Creche Ltd.	0-6 Years Full Day	41
11	Kidz Akademy Ltd	1-6 Years Full Day, Part Time, Sessional	29
12	Lios na nOg Playgroup CLG	2-6 Years Full Day	105
13	Little Buds Playschool	2-6 Years Sessional	16
14	Little Partners Creche Ltd	1-6 Years Full Day, Part Time, Sessional	49
15	Naíonra Dhún Dealgan	2-6 Years Sessional	44
16	Pugwash Bay Ltd T/A Pugwash Bay Creche & Montessori	2-6 Years Full Day, Part Time, Sessional	38
17	Pugwash Bay Ltd T/A Pugwash Bay Creche & Montessori	0-6 Years Full Day	72
18	Realt na Mara Pre-School and Afterschool	3-6 Years Sessional	22
19	Redeemer Creche & Playgroup	0-6 Years Full Day	68
20	Shapes and Sizes	3-6 Years Full Day	44
21	St. Malachy's Pre-School	3-6 Years Sessional	40
22	St. Nicholas N.S. Pre-School	2-6 Years Sessional	14
23	Tiny Tots Nursery	0-6 Years Full Day, Part Time Sessional	63
24	Stepping Stones	2-6 Years Full Day, Part Time, Sessional	31
25	Liana Lally Preschool	2-6 Years Sessional	14
26	Miniminds Preschool	2-6 Years Full Day, Part Time, Sessional	68
27	Dun Dealgan Childcare	2-6 Years Full Day	39
28	Footprints Preschool	2-6 Years Sessional	22

4.5.12.3 Health Services

There is a wide range of Health and Wellbeing facilities located in proximity to the site, including GPs, dental surgeries, nursing homes and pharmacies, see Figure 4-8 below. Table 4-10 outlines the type of healthcare and wellbeing facilities identified in the study area.

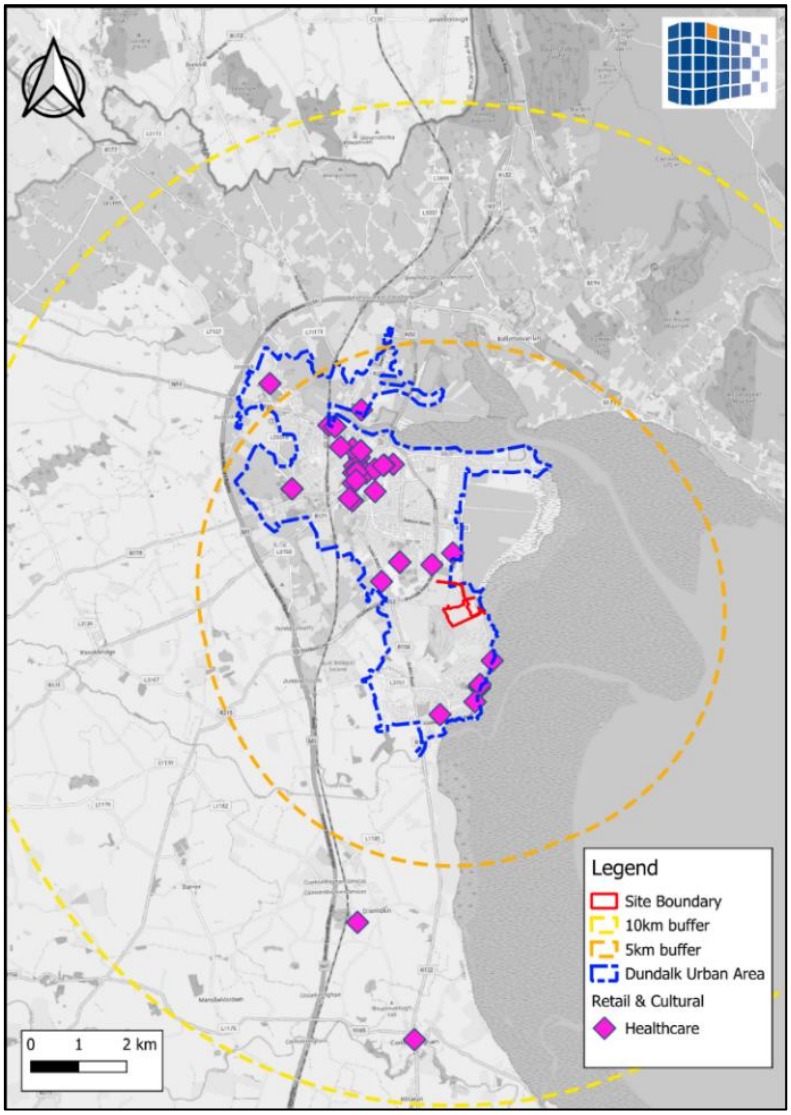

Figure 4-8 Healthcare Facilities in Study Area

Table 4-10 Health and Wellbeing Facilities in Study Area

No.	Healthcare Facilities
General Practice	
1	All Care Clinics
2	Blackrock Family Practice
3	Carrick Road Medical Centre
4	Castletown Clinic
5	Church Street Medical Centre

6	Dr Byrnes Surgery
7	Dr Ciarin Cairns Medical Practice
8	Dr J. Whately Surgery
9	Dr Liam Mcgrath
10	Dr. Sunita Ramachandran
11	Lugh Medical Centre
12	Roden Court Medical Clinic
13	South Beach Medical Centre
14	The Laurels Health Centre
15	The Square Medical
Pharmacy	
16	Townparks Pharmacy
17	Allcare Pharmacy
18	Backhouse Pharmacy Limited
19	Boots
20	Byrne's Late Night Pharmacy
21	Castletown Pharmacy
22	Cogaslann Pharmacy
23	Tipping's Neighbourhood Pharmacy
24	Haughey's Pharmacy
25	Hickey's Pharmacy
26	Kelly's Pharmacy
27	Leavy's Pharmacy
28	Magee's Pharmacy
29	Matthew's Pharmacy
30	McCabes Pharmacy
31	McCormack's Pharmacy
32	McGuinness Pharmacy Limited
33	McQuillan's Pharmacy
34	Oriel Pharmacy
35	Pure Pharmacy
36	Smyth's Life Pharmacy
37	Dromiskin Pharmacy
38	White's Pharmacy
Dentist	
39	Dental Clinic
40	Health Smiles Dental Clinic
41	Orthos
Nursing Home	
42	Blackrock Abbey Nursing Home
43	St. Oliver Plunkett
44	St. Francis' Nursing Home
45	Dealgan House Nursing Home

4.5.12.4 Community and Faith Centres

Dundalk is served by several community centres and services, including churches, cemeteries, a public library, garda and fire stations, post offices, and town halls, as shown in Table 4-11 and Figure 4-9 below.

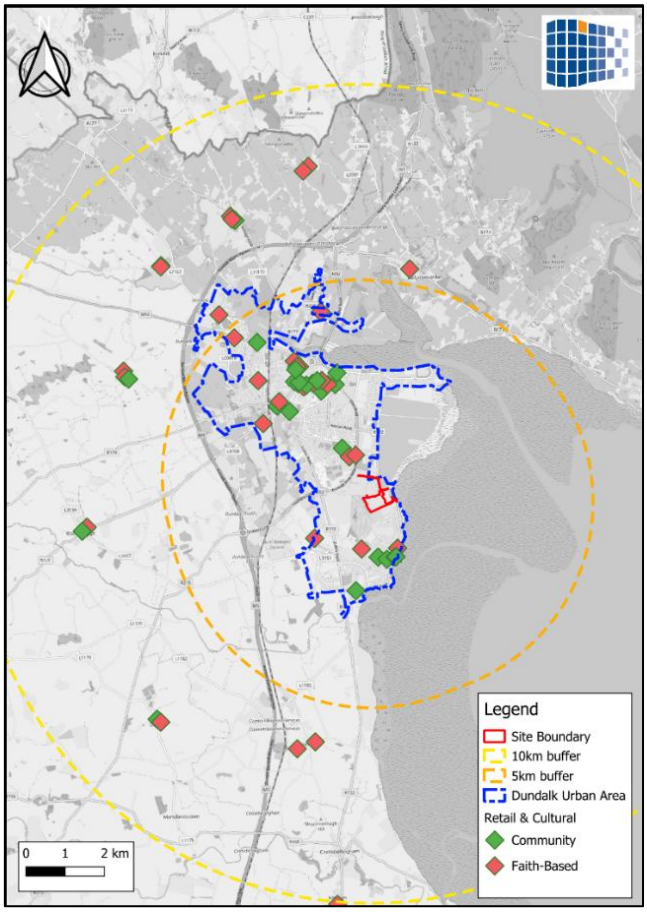

Figure 4-9 Community and Faith Facilities in the study area

Table 4-11 Community and Faith Facilities in Study Area

No.	Community and Faith Facilities
Community Centre	
1	A.O.H. Hall (1919)
2	Blackrock Community Centre
3	Muirhevna Mór Community Centre
4	Darver Community Centre
5	Kilcurry Resource Centre
Library	
6	Louth County Library
Fire Station	
7	Dundalk Fire Station
Courthouse	

No.	Community and Faith Facilities
8	Dundalk Courthouse
Post Office	
9	Blackrock Post Office
10	Dundalk Post Office
11	Post Office
12	Castletown Post Office
Police	
13	Blackrock Garda Station
14	Dundalk Garda Station
Town Hall	
15	Louth County Council
16	Town Council
Place of Worship	
17	Church of the Holy family
18	Dundalk Baptist Church
19	Dundalk Muslim Community Centre
20	Dundalk Presbyterian Church
21	Emmanuel Community Church
22	Saint Malachy's
23	Saint Nicholas Parish Church
24	Saint Oliver Plunkett's Church
25	Saint Patrick's Cathedral
26	St Fursey's
27	St Mary's Chapel
28	St. Nicholas' Roman Catholic Church
29	The Holy Redeemer
30	The Redemptorists
31	Castletown Post Office
32	St. Peter's Church
33	St Michael's Church
34	St. Bridgid's Oratory
35	St. Finians Church
36	St Joseph's Church
37	St Brigid's Church
38	Saint Mary's
39	Saint Mary's
40	Saint Mary's
41	Saint Brigid Shrine
42	Church of the Holy Rosary
43	Church of Immaculate Conception
Graveyard	
44	Haggardstown Old Church & Cemetery

No.	Community and Faith Facilities
45	Kilcurry Cemetery
46	Kilkerley Cemetery
47	Lordship Cemetery
48	Saint Mary's Cemetery
49	Casteltown Cemetery
50	Church of the Holy Rosary Cemetery
51	Dromiskin Cemetery

4.5.12.5 Green and Blue Infrastructure Facilities in Study Area

Dundalk offers a diverse array of open spaces, Figure 4-10 illustrates and Table 4-12 lists the various parks, recreational areas, green spaces and beaches within proximity to the subject site.

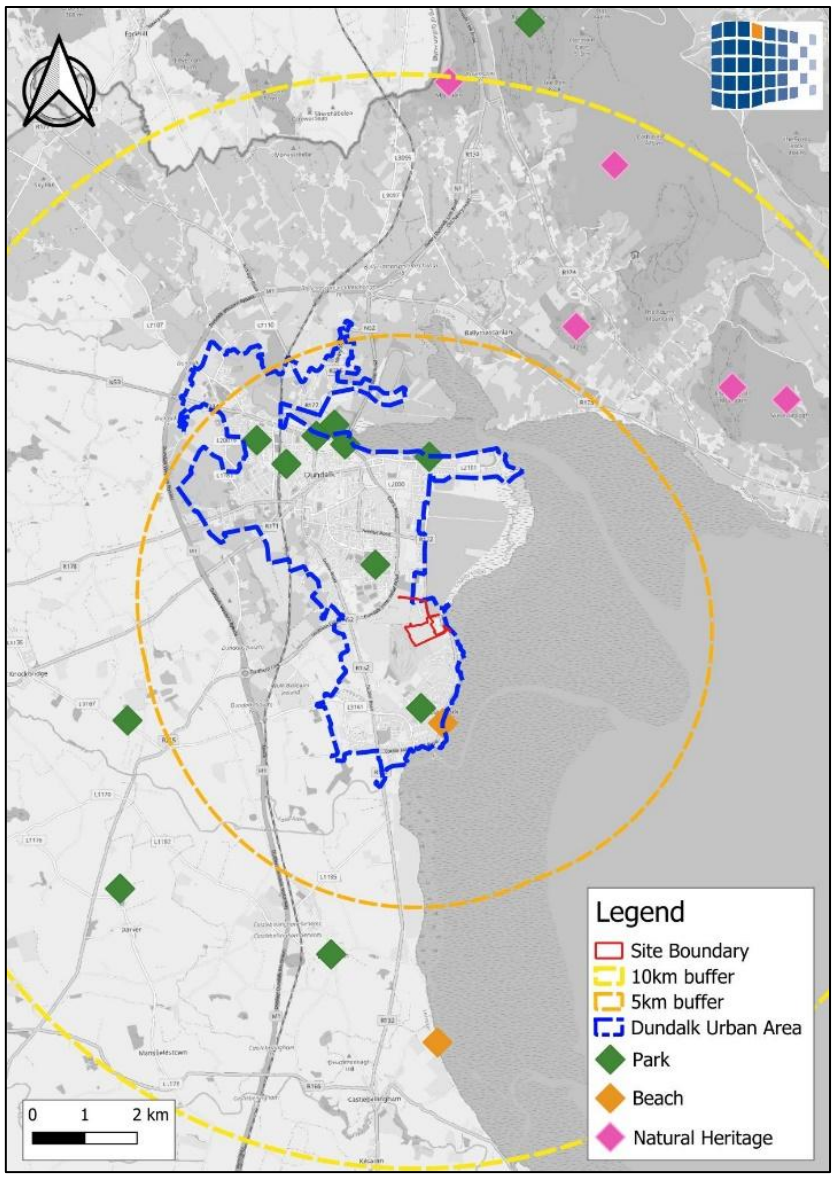

Figure 4-10 Green and blue infrastructure in the study area

Table 4-12 Green and blue infrastructure in the study area

No.	Green and Blue Infrastructure Facilities
Park	
1	Blackrock Community Centre
2	Muirhevna Mór Community Centre
3	The Navy Bank
4	St. Helena's Park
5	Ice House Hill Park
6	Castletown River Walkway
7	Siocháin Peace Garden
8	Aisling Park
9	Stephenstown Pond
10	Commons Park
11	Ravensdale Forest
Beach	
12	Blackrock Beach
13	Castlebellingham Beach
Natural Heritage	
14	Trumpet Hill
15	Annaloughan Mountain
16	Slievenaglogh
17	Carlingford Mountain
18	Feede Mountain

4.5.12.6 Sports and Recreational Facilities in Study Area

In terms of sports and recreation facilities, Figure 4-11 illustrates the wide range of sport facilities as well as other smaller sporting clubs and venues in close proximity of the proposed development site. A full list of the recreational facilities and amenities are provided in the Appendix Chapter of the *Community and Social Infrastructure Audit* (MH Planning).

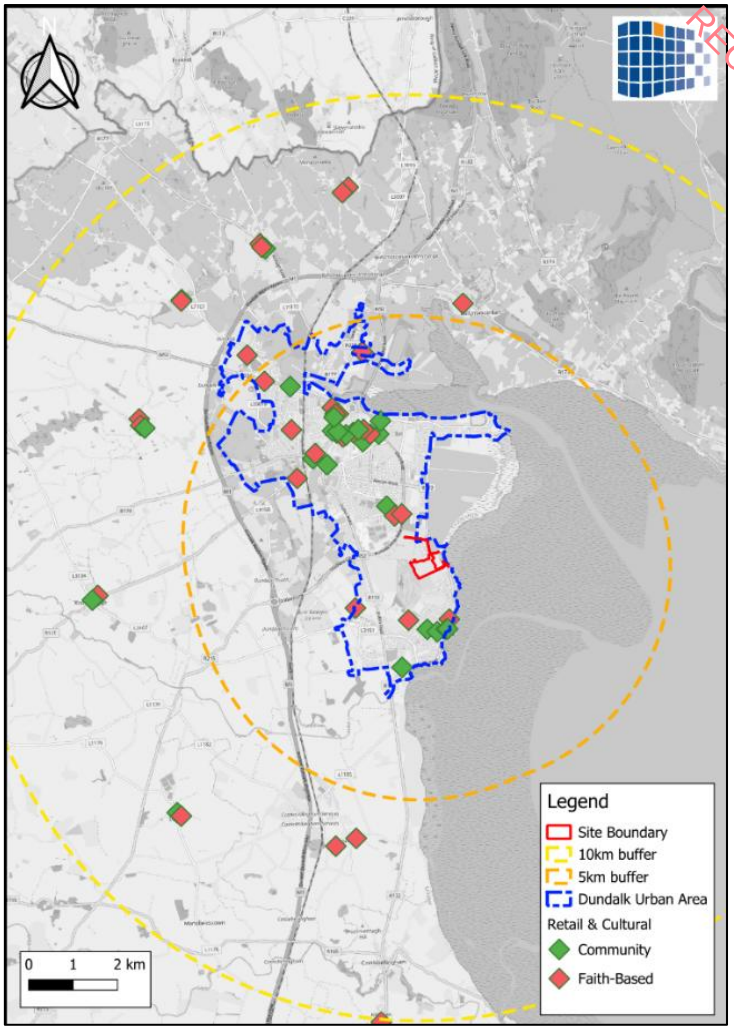

Figure 4-11 Sports and Recreational Facilities in Study Area

4.5.12.7 Retail Facilities in Study Area

There are a large number of retail services located in the study area. The 209 no retail facilities identified, comprising of convenience, comparison, financial and business services, food and beverage, and retail services as shown in Figure 4-12. A full list of the retail facilities are provided in the Appendix Chapter of the *Community and Social Infrastructure Audit* (MH Planning).

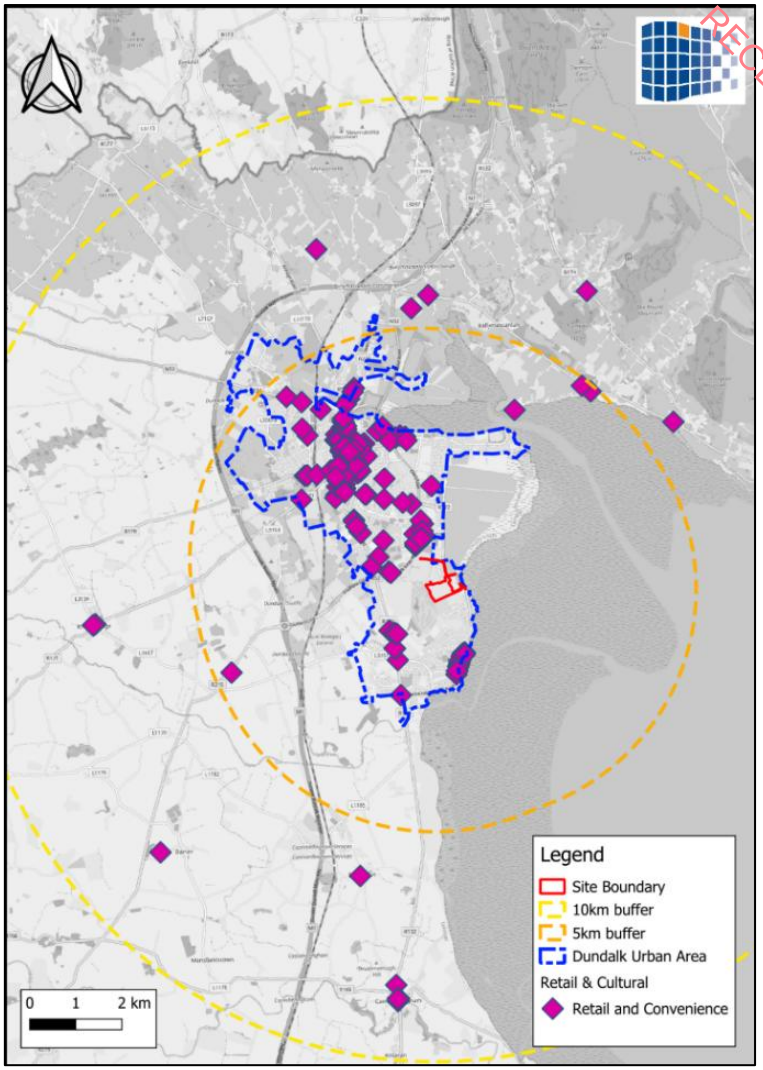

Figure 4-12 Retail in the study area

In conclusion, this *Community and Social Infrastructure Audit* (MH Planning) concluded that the proposed development site is well-serviced by existing services and facilities, well-distributed geographically within c. 15 min distance, and within close proximity to a transport hub. Therefore, it is capable of accommodating existing and future demand derived from the proposed development.

4.5.13 Sensitive Receptors

For the purpose of this chapter, the primary sensitive receptors are:

I. Existing residential dwellings in the vicinity of the proposed development site, in particular, existing low-rise dwellings located to the north along Bóthar Maol and east on Blackrock Road;
II. Residents to south along Birches Lane and including Village Green;
III. Residents in Blackrock Village;
IV. Recreational users of Dundalk Golf Club; and
V. Users of the public road network, specifically Blackrock Road (R172), Bóthar Maol.

4.6 The 'Do Nothing' Scenario

If the proposed development was not to proceed, there would be no immediate impact on the existing population, or economic activity for residents living in the area. It is anticipated that the existing site will remain in its current condition as a vacant site in the short to medium term and will become overgrown by grass and scrub.

In the absence of this proposal, having regard to the location of the proposed development site within the existing built-up area of Dundalk, it is likely that another residential proposal would be progressed on the site in the short to medium term. This is in accordance with national strategic outcomes - NSO 7 – (NPF) to deliver a greater proportion of residential development within the existing footprint of built-up areas and to make better use of under-utilised land serviced by existing facilities and public transport.

The effect of the construction of another residential scheme at this location would likely be similar to the effects of the proposed development, as outlined in this chapter. The key variable during the operational phase would relate to the form of any future development proposal. Should a lower-scale scheme be progressed, then the likely visual impact may theoretically be reduced; however, in the absence of scheme specifics, it is not possible to rate the effect with any degree of confidence.

In the absence of any development of the site, the impact is determined to be negative, with a significant effect on the delivery of homes within the existing built-up footprint of Dundalk. Without the development of these residentially zoned urban lands, the existing unsustainable pattern of urban sprawl is likely to continue. This would result in the expansion of the physical footprint of Dundalk and other urban areas, as well as continued housing affordability issues.

In terms of Population and Human Health, a 'do nothing' scenario (i.e., not developing the proposed development site) would represent a lost opportunity to develop lands for residential use. As such, the proposed development site would remain underutilised, and it would not contribute to increasing the provision of housing in this area.

4.7 Difficulties Encountered

There were no difficulties encountered preparing this chapter.

4.8 Consultation

Two meetings were carried out with the Planning Authority ahead of formal lodgement of this LRD planning application. A Section 247 consultation and an LRD meeting was held with representatives of Louth County Council in advance of making this planning application (November 2024 and March 2025 respectively). An LRD Opinion was issued following this meeting, dated March 2025. Further detail in this regard is provided within the Planning Statement that accompanies this application under separate cover. The proposed development has been designed having full regard to the specific requirements, and the application is accompanied by the additional reports as highlighted.

4.9 Impact Assessment

This section describes the environmental effects that are likely to arise during the construction and operation of the proposed development. Section 4.10 sets out the mitigation measures required to alleviate identified effects.

Potential Impacts are considered under the following headings in line with the Guidelines set out in Section 4.4:

- Population
- Employment and Economics
- Health
- Residential Amenity
- Local Amenity Impacts

Specific effects with respect to matters such as air quality, noise, traffic, visual impact etc. are dealt with in the respective assessments in this EIAR.

4.9.1 Construction and Demolition Phase

The potential impacts of the proposal during the construction and demolition phase of the development are outlined below.

4.9.1.1 Population

It is estimated that during peak construction, there will be an average of 75-90 people employed on site. It is not anticipated that this will generate a temporary increase in population locally as employees will travel to the proposed development site from their existing place of residence. The likely impact on the population is thus **neutral, short term and not significant.**

4.9.1.2 Employment & Economics

A vital characteristic of the proposed development in terms of its potential economic impact relates to its capital value, of which a significant portion will be for the purchase of Irish sourced goods and services. The construction phase (approx. 47 months) will provide a boost for the local construction sector in terms of employment generation (average of 75-90 people employed on-site), capital spend on materials and construction labour costs, and it will generate additional spending on the local economy (retail and local shops). It will complement the new retail, commercial and community uses that are currently under construction on the adjoining Claremont site.

The staff will comprise of managerial, technical, skilled and unskilled workers and as far as practicable, local labour will be employed. It is unlikely that the proposed development will increase the population of the area as a result of the construction phase.

In addition to direct employment, there will be substantial off-site employment and economic activity associated with the supply of construction materials and provision of services, such as professional firms supplying financial, architectural, engineering, legal and a range of other professional services to the project, and additional spending in local shops and other local retail services and as a consequence of the presence of construction staff during the construction phase.

The overall predicted impacts associated with the construction phase on the working population and local economy are **likely** and will have a **positive, temporary/short-term, not significant** effect.

4.9.1.3 Health

Construction sites pose potential risks to the health and safety of the public. However, access by the public would be considered trespassing on private property. In the absence of mitigation, the effect would likely be **significant,** with an effect that might range from **slight to profound** depending on the magnitude of the incident.

In the absence of standard construction mitigation measures, likely significant impacts would arise from construction traffic, noise, dust, and visual effects. It is noted that the potential for effects on population and human health during the construction phase are dealt with in this EIAR under the more specific topics of the environmental media by which they might be caused including landscape and visual, air quality, traffic and noise.

4.9.1.4 Residential Amenity

The anticipated likely significant effects in the absence of mitigation on residential amenities relate to disruption due to increased construction traffic movements on the local road network, noise, dust and visual impact arising from plants (e.g. cranes) necessary to deliver the development.

In the absence of mitigation, the anticipated impact on residential amenity would be **local** and of **temporary to short-term** duration with a **moderate** significance.

Specific potential for effects on residential amenities during the construction phase is dealt with in this EIAR under the more specific topics of the environmental media by which they might be caused including air, traffic and noise.

4.9.2 Operational Phase

4.9.2.1 Population

Regarding population, the proposed residential scheme will result in a generally positive alteration to the existing greenfield site which will serve to the growing population of the area. It is anticipated that the proposed development will accommodate a projected full-time population of approximately 1,376 persons[4]. Overall, the likely impact of the proposed development of the operational phase on population is determined to be a **moderate-significant**, **positive** and **long-term.**

The **Childcare Demand Assessment** that accompanies this application notes that the scheme would generate a demand for 24 spaces in conjunction with the provision of 462 units capable of accommodating families on the proposed development site. The cumulative demand for childcare in Dundalk Urban Area is established to be 1,325 spaces. There is capacity for 1,139 spaces within the catchment area. To address this shortfall, the development will include a childcare facility with 120 spaces, of which 96 will help mitigate the existing deficiency.

[4] Estimated future population based the national household average of 2.74

The impact of the proposed development on childcare facilities is determined to be **locally positive** with an **imperceptible** significance.

As outlined in the **School Demand Assessment** which accompanies the application under separate cover, it is estimated that the proposed development will generate 152 primary school children and a requirement for 182 post-primary school places. It is noted that there are 28 primary schools and 8 post-primary schools within 10km catchment area. Additionally, the Dundalk Local Area Plan 2025-2031 includes plans to develop several new schools in the area. Overall, the impact of the proposed development on primary and post primary schools is determined to be **locally neutral** with a **not significant** effect.

There is a wealth of existing amenities in the wider area including sports and recreational facilities. The increase in population will place additional demands on existing amenities but will also provide a critical mass to support the delivery of social infrastructure. Within the proposed development a series of public and communal open spaces are planned that will ensure future occupants benefit from access to a range of recreational opportunities within the site. The proposed communal and public open spaces incorporate play areas for all ages that will further enhance the provision locally and the effect is deemed **positive**.

To support sustainable travel, it is necessary for future population growth to predominantly take place in sustainable compact urban areas, which discourage dispersed development and long commuting. Development of the site at Dundalk would deliver a critical mass of growth in population that would ensure the long-term viability of public transport infrastructure presented in the area. The effect is thus determined to be **moderate-significant**, **positive**, and **permanent**.

4.9.2.2 Employment & Economy

In terms of the operational phase, the potential employment opportunities will be limited given that residential is the predominant land use proposed. Notwithstanding this, there will be some employment created in the servicing and maintenance of the apartment buildings and for the upkeep of the landscaped areas.

The economic impact of the operational phase on the immediate area would therefore **be positive permanent**, and given the modest nature of employment opportunities, of **imperceptible** significance.

The new residential population will generate additional spending within the Dundalk area which will likely have a **permanent, slight,** and **positive** impact on local economic activity generated through the multiplier effect.

4.9.2.3 Health

Insufficient physical activity has been identified by the World Health Organisation (WHO) as the fourth leading risk factor for global mortality. Urban air pollution and traffic injuries are also responsible for a further 2.6 million deaths annually. The health benefits of active transport (walking and cycling combined with public transport) can prevent many of these deaths from physical inactivity.

The proposed scheme minimises carparking and prioritises both pedestrian and cyclists. A total of 660 no. bicycle spaces are proposed. This includes 502 residential spaces, 120 visitor spaces, 22 creche

spaces, and 16 bicycle share spaces. The layout provides for the segregation of pedestrians and traffic and incorporates the principles of universal access and the requirements of Part M of the Building Regulations so that the development will be readily accessible to all, regardless of age, ability or disability. The predicted effect of these combined measures on the health and wellbeing of future occupants is **significantly positive**.

The integration of energy efficient measures into the design will provide for healthier living standards for future occupants and less dependence on fossil fuels for energy generation. This will result in significant CO_2 savings, promote a modal shift, will contribute to improved air quality and the impact is likely to be **locally significantly positive** and of **permanent duration**.

4.9.2.4 Residential Amenity

During the operational phase, the high-quality living environment of the proposed scheme will result in positive impacts on amenity for future residents There are **significant** benefits for population and human health in pursuing this approach, bringing people closer to where they can access daily living needs, improving air quality and reducing greenhouse gas emissions.

The floor plans meet or exceed all minimum requirements, as detailed in the *Housing Quality Audit (HQA)* prepared by JFA Architects which accompanies this planning application.

Of the 502 proposed dwelling units, 40 units will be maisonettes. The proposed design is intended to maximise the number of dual-aspect units. Dual-aspect apartments provide greater daylight, an increased chance of direct sunlight for longer periods, natural cross-ventilation, a greater capacity to address overheating, a choice of views, and greater flexibility and adaptability in the use of rooms.

To provide private amenity space for future residents, each apartment benefits from access to ground-floor terraces or balconies, while each dwellinghouse unit benefits from a private garden. The positions of these private amenity spaces have been carefully considered to avoid overlooking.

The development has been designed with due consideration for sunlight and daylight and meets the recommendations as set out in the BRE Guide – BR 209 "Site Layout Planning for Daylight and Sunlight, A guide to good practice (2022)". A *Daylight & Sunlight Report* has been prepared by 3DDB for the LRD application and this report should be referenced in conjunction with this chapter.

Given the above, the likely effects on the residential amenity of future residents during the operational phase are **positive**, **permanent,** and **significant**.

During the operational phase, the proposed development will have little impact on existing residential amenity. The proposed development will have negligible impact on surrounding buildings with respect to daylight, with neighbouring buildings enjoying a similar level of daylight/skylight. This is due to the topography of the site, the mature boundaries being retained, the undeveloped lands to the west and appropriate setbacks from existing residential properties where natural screening is insufficient.

Given this, no visual amenity or privacy impacts are anticipated for existing residents, as demonstrated by the *CGIs Verified View Photomontages* prepared by 3DDB which accompanies the proposed development and the Landscape & Visual Chapter of this EIAR.

4.9.2.5 Local Amenity

During the operational phase, the proposed development will have an overall positive impact on local amenities.

As detailed in the *School Demand Assessment, Childcare Demand Report and Social Infrastructure Audit* reports by McCutcheon Halley Chartered Planning Consultants, which accompany the application, adequate capacity exists for existing social infrastructure within the locality such that it is anticipated that the proposed development will have a **neutral**, **imperceptible, long-term** impact on access for existing residents. Furthermore, the application includes a large two-storey childcare facility, which will have **significant positive, long-term effects,** through improving the variety and accessibility of the social infrastructure offerings in the area.

4.9.3 Cumulative Effects

The cumulative effects of projects in the vicinity of the study area have been considered with reference to the projects outlined in **Chapter 1** of this EIAR.

This includes recently permitted housing schemes in the surrounding area, such as those located at Inner Relief Road (R215), Dublin Road (R132), Old Golf Links Road, Tuite's Lane, Haggardstown, Green Park Inner Relief Road, Marshes Upper, the Loakers, Bellfield, Dublin Road, Birch's Lane, and Raynoldstown Village. Additionally, there are several residential development applications in the area that are currently awaiting decisions from Louth County Council or An Bord Pleanála.

The construction phase of these housing schemes, particularly those in close proximity to the site, in conjunction with the proposed development, is expected to lead to increased traffic and noise in the area, which will have a **Temporary, Negative Impact.** However, these impacts will be managed effectively through the implementation of a Construction Environmental Management Plan (CEMP) which will be implemented for each scheme.

These approved housing schemes together with this proposed development will provide new homes in the Dundalk area. Having regard to the housing crisis that exists across the State, this will have a **very Significant, long-term positive** effect.

A neighbourhood centre was recently permitted at 'The Village Green', The Boulevard Raynoldstown Village, comprising of various amenities that will serve the local community. This development is expected to generate significant employment opportunities, boost the local economy, and provide residents with convenient access to essential goods and services. The proposed development will complement this neighbourhood centre by increasing the local population, thereby enhancing the demand for the amenities provided. This increased footfall will support the viability of businesses within the centre, while in turn providing additional amenities to the residents in proximity to the site. This will have a **very Significant positive long-term** effect.

The design of the proposed development seeks to encourage a modal shift away from private motor vehicles and towards sustainable transportation, leading to increased physical activity and reduced car dependency. The Inner Relief Road Active Scheme and Dundalk Active travel Project will improve pedestrian and cyclist access and safety in the vicinity of the subject site and is anticipated to encourage a similar modal shift towards sustainable transportation. The positive effects of such

sustainable transportation interventions and the compact development of urban areas is synergistic in nature, as sustainable transportation allows for more compact forms of development, while compact development itself provides a critical population mass to make such interventions viable.

4.10 Mitigation Measures

4.10.1 Incorporated Design Mitigation

The proposed development complies with the Building Regulations 1997 to 2024 (the Building Regulations), which provide for the safety and welfare of people in and around buildings. The Building Regulations cover matters such as structure, fire safety, sound, ventilation, conservation of fuel and energy, and access, all of which safeguard users of the buildings and the health of occupants.

The proposed development complies with the requirements of Part M of the Building Regulations and incorporates the principles of universal design so that the development will be readily accessible to all, regardless of age, ability, or disability.

The proposed design will segregate pedestrians and bicycle traffic from motorised traffic. The integration of energy efficient measures into the design will provide for healthier living standards for future occupants, less dependence on fossil fuels and associated improved air quality.

The availability of on-the-doorstep public open spaces and amenity areas will provide a high quality environment for the residents and will encourage sustainable modes of outdoor access for a wide age group.

4.10.2 Construction and Demolition Phase

An *Outline Construction and Environmental Management Plan (CEMP)* for the proposed development is included in the application documentation. The Outline CEMP will be updated by the contractor(s), submitted to the Council prior to commencement, and implemented by the selected contractor (s) after any consent is received.

All construction personnel will be required to understand and implement the requirements of the CEMP and shall be required to comply with all legal requirements and best practice guidance for construction sites.

The CEMP provides for a construction phase management structure to ensure that environmental protection and mitigation measures are put in place. The CEMP requires that these measures will be checked, maintained to ensure adequate environmental protection. The CEMP also requires that records will be kept and reviewed as required to by the project team and that the records will be available on site for review by the planning authority.

All construction personnel will attend induction and training classes as required to ensure that the CEMP is effectively implemented. The CEMP will comply with all appropriate legal and best practice guidance for construction sites.

Project supervisors for the construction phase will be appointed in accordance with the Health, Safety and Welfare at Work (Construction Regulations) 2013 (as amended), and a Preliminary Health and Safety Plan will be formulated during the detailed design stage which will address health and safety issues from the design stages, through to the completion of the construction phases.

Adherence to the construction phase mitigation measures presented in this EIAR will ensure that the construction of the proposed development will have an **imperceptible** and **neutral** impact in terms of health and safety during the **short-term** duration of the works.

4.10.3 Operational Phase

The proposed development is of a high quality design that incorporates generously sized dwellings with integrated energy efficiency measures and an abundance of open space. The impact assessment section did not identify likely significant negative environmental impacts on population and human health arising from the operational phase of the proposed development. Accordingly, mitigation measures are not proposed.

4.11 Residual Impact Assessment

At construction phase, the anticipated **likely significant** effects on population and human health during the construction phase relate to disruptions from increased construction traffic on the local road network, as well as noise, dust, and visual impacts from construction activities and equipment, such as cranes. These impacts on residential amenity are expected to be **localised, temporary**, and of **short-term** duration, and of **moderate significance**.

At operation phase, the residual effect of the proposed development for population and human health is determined to be **significantly positive** having regard to the delivery of much needed new homes in a location that has the carrying capacity in terms of both services and amenities to support the population generated by the scheme.

The proposed mitigation measures will avoid, prevent, reduce impacts on the human environment during the construction and operational phases of the proposed development, where no significant adverse residual effect have been identified.

Allowing people to live in close proximity to their daily living needs together with access to public transport, employment locations and recreational areas are considered a **significantly positive** effect for population and human health

4.12 Interactions

Interactions are dealt with in Chapter 16 of this EIAR.

4.13 Monitoring

Measures to avoid negative impacts on Population and Human Health are largely integrated into the design and layout of the proposed development. Compliance with the design and layout will be a condition of any permitted development.

No specific monitoring is proposed in relation to this section. Monitoring of standard construction mitigation measures as outlined in this EIAR will be undertaken by the appointed contractor(s).

4.14 Worst Case Scenario

The worst-case scenario on population and human health is considered to be the risk of an accident during the construction phase. According to the Health and Safety Authority[5] , in 2024 there were 5 fatal accidents recorded equivalent to 15.15% of the total fatal work-related incidents. In 2023, 10 fatal accidents occurred in construction equivalent to approx. 26% of the total fatal work-related incidents. This represents a decrease from the number recorded the year previous.

The HSA has undertaken a range of activities in regulation, education, accreditation and enforcement to reduce incidents on construction sites. The appointed contractor is required to comply with all relevant Health and Safety legislation and the risk of a fatality is deemed unlikely.

This worst-case scenario is considered **unlikely**, and the significance of the effect is **indeterminable**.

4.15 Conclusion

There are no significant adverse effects with respect to socio-economic factors, land use, or the amenity value potential of the area. Issues which may cause risks and hazards during the construction and operational phase of the development are given due consideration. All necessary mitigation measures will be put in place to ensure the health and safety of all site personnel and neighbouring properties. All other environmental aspects relating to the human environment which could have an adverse effect on the local population such as soils, geology & hydrogeology, water and ecology have been addressed in the relevant chapters of this EIAR.

4.16 References and Sources

- National Planning Framework First Revision (2025)
- Eastern and Midlands Regional Spatial and Economic Strategy 2019 – 2031
- Louth County Development Plan 2021-2027
- Dundalk Local Area Plan 2025-2031
- Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report (European Commission, 2017)

[5] Available via: https://www.hsa.ie/eng/topics/statistics/annual_review_of_workplace_injury_illness_and_fatality_statistics/annual-review-of-workplace-injuries-illnesses-and-fatalities-2021-2022.pdf; and
Work-related fatalities rate in Ireland reaches record low in 2024 - Health and Safety Authority

- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (Department of Housing, Planning & Local Government, 2018)
- Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EPA, 2022)
- Advice Notes on Current Practice in the Preparation of Environmental Impact Statements (EPA, 2003).

Websites

- Central Statistics Office (CSO) website (www.cso.ie)
- Department of Education (DE) website (www.education.ie)
- GeoDirectory-GeoFindIT App
- Pobal website (maps.pobal.ie)
- Health and Safety Authority website (hsa.ie)

Haggardstown LRD

Dundalk, Co. Louth

Main Statement

Volume II

CHAPTER 5

Landscape & Visual

May 2025

McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

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Table of Tables

5 Landscape and Visual

5.1 Introduction

The purpose of this chapter in the EIAR is to identify and determine the potential effects on the landscape character and visual amenity arising as a result of the proposed development at Haggardstown, Co. Louth. A detailed description of the proposed development can be found in Chapter 2 of the EIAR.

All work is undertaken in compliance with the *Landscape Institute's Code of Standards of Conduct and Practice for Landscape Professionals* and checked in accordance with Park Hood's ISO 14001:2015 and ISO 9001:2015.

The overall approach and methodology undertaken in this chapter are based on techniques and guidance in the *Guidelines for Landscape and Visual Impact Assessment*, (3rd Edition, 2013) published by The Landscape Institute and the Institute of Environmental Management and Assessment (GLVIA).

5.2 Expertise & Qualifications

This Landscape and Visual Assessment (LVIA) has been prepared by Park Hood Chartered Landscape Architects on behalf of Marina Quarter Ltd.

Park Hood is a Chartered Member of the Irish Landscape Institute and Landscape Institute UK with extensive experience in preparation of Landscape and Visual Impact Assessments for large scale projects throughout Ireland and the UK (based out of offices in Belfast, Dublin and London).

The primary author is Andrew Bunbury who is a fully qualified Landscape Architect and Chartered Member of the Landscape Institute (CMLI) UK with over 25 years' consultancy experience in the landscape profession across the UK and Ireland.

All work is undertaken in compliance with the *Landscape Institute's Code of Standards of Conduct and Practice for Landscape Professionals* and checked in accordance with Park Hood's IMS (ISO 14001:2015 and ISO 9001:2015).

5.3 Proposed Development

The proposed development is described in Chapter 2. The development generally comprises of 502 no. residential units, comprising 1, 2, 3 and 4 bed units in a mix of maisonettes, terraced and semi-detached units, with 1 no. detached bungalow unit; Creche building and all associated site and development works including landscaping and amenity areas, infrastructure and services, and new entrance from Blackrock Road, with additional pedestrian/cycle access from Bóthar Maol.

Figure 5.1 Internal View of the Proposed Development

5.3.2 Aspects Relevant to this Assessment

The most appreciable considerations in relation to the LVIA are changes likely to occur to the baseline landscape setting and views as a consequence of the proposed development related to new buildings, streets, open spaces and planting. The preliminary design considerations took into account existing features on the site including the internal hedgerows and peripheral tree groupings towards Bóthar Maol and how these could either be retained or be subject to minimal impacts as a consequence of the proposed site layout.

Landscape and visual effects can be quite different and are assessed separately; although the process is similar, and effects ultimately arise as a result of combined impacts upon the landscape and visual amenity of a proposed development. Developments can have significant visual effects but no impact on landscape/townscape character and some can be vice versa.

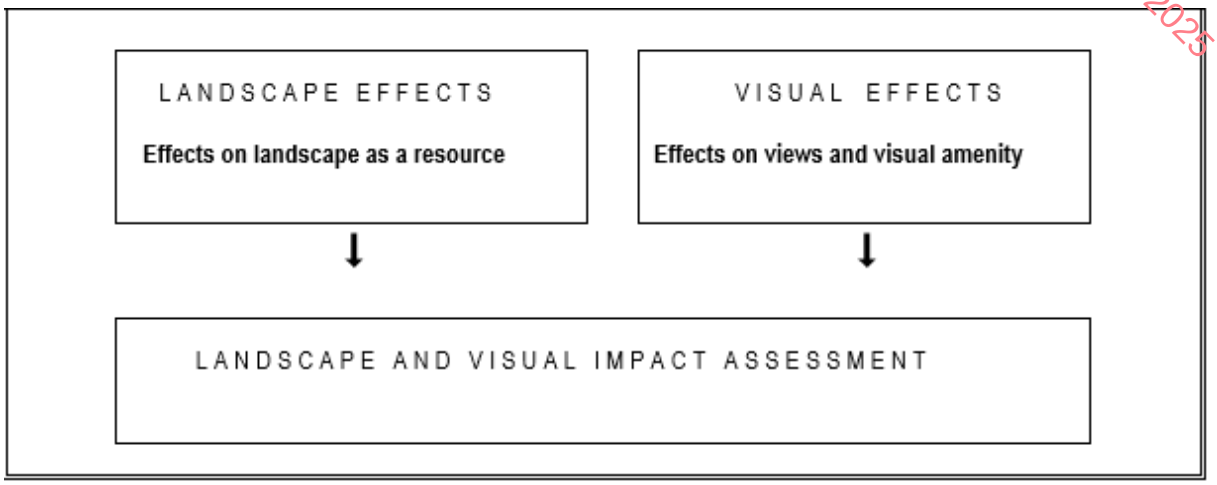
Landscape Effects are the effects on landscape as a resource and defined as follows:

> *"An assessment of landscape effects deals with the effects of change and development on landscape as a resource. The concern ... is with how the proposal will affect the elements that make up the landscape, the aesthetic and perceptual aspects of the landscape and its distinctive character. ... The area of landscape that should be covered in assessing landscape effects should include the site itself and the full extent of the wider landscape around it which the proposed development may influence in a significant manner."* (GLVIA3 paragraphs 5.1 and 5.2)

Visual Effects are the effects on Views and Visual Amenity and summarised as follows:-

"…establish the area in which the development may be visible, the different groups of people who may experience views of the development, the places where they will be affected and the nature of the views and visual amenity at those points." (GLVIA3 paragraph 3.13)

Table 5-1 Landscape and Visual Effects – Distinctions and Assessment Process



5.4 Methodology

5.4.1 Relevant Legislation & Guidance

Aside from the GLVIA as noted above, guidance for this chapter includes the following:-

- *Guideline on the Information to be Contained in Environmental Impact Assessment Reports published by EPA (2022);*
- *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment published by the Department of Housing, Planning and Local Government (2018);*
- *Louth County Development Plan 2021-2027;*
- *Dundalk Local Area Plan 2025-2031;*
- *Landscape Institute Technical Guidance Note 06/19: Visual Representation of Development Proposals (2019)* in conjunction with 3D Design Bureau who are preparing the accompanying photomontages; and
- *Landscape Institute Technical Guidance Note 2/19: Residential Visual Amenity Assessment (RVAA).*

5.4.2 Summary of LVIA Objectives and Key Tasks

The objective of the LVIA is to evaluate the likely significance of landscape character and visual amenity effects to the Application Site and Study Area to assist the determining authority in considering the acceptability of the Proposed Development. It is based on the interpretation of the physical and aesthetic characteristics following criteria and terminology partially drawn from *Principles and Overview of Processes* (Chapter 3) within the GLVIA. The LVIA focuses on key effects and issues as follows:

- The effect of the proposed development upon the landscape resource;
- The effect of the proposed development on the perception of the landscape; and
- The effects arising from the proposed development on visual amenity.

The LVIA methodology can be summarised as undertaking the following key tasks:-

- Site surveys and visits;
- Assessing the baseline Landscape Setting and Conditions;
- Evaluation of key components of the proposed development based on site layouts, plans, layouts, plans and elevations including any Mitigation and Enhancement Measures;
- Assessment of Landscape and Visual Effects; and
- Conclusions

5.4.2 1 Definition of Landscape

For the purpose of this assessment, this chapter adopts the definition of landscape presented in the European Landscape Convention and refers equally to areas of rural countryside and urban – built up –areas (typically historically referred to as 'townscape'). The definition of landscape is:-

> *'An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors.'*

The assessment process helps identify the effects of the proposed development on views and on the landscape.

5.4.2.3 Photomontages and Visualisations

Ten photomontages from the representative viewpoints in and around this part of Dundalk are contained in the Photomontages booklet prepared by 3D Design Bureau (February 2024) that accompanies this planning application. Park Hood based the viewpoint selection on the *Landscape Institute Technical Guidance Note 06/19: Visual Representation of Development Proposals*. The guidance also includes reference to photographic technology, including camera selection, choice of lens and printing which were taken into account by 3D Design Bureau (who have set out further details on methodology and presentation in an Appendix to their booklet - *CGI's and Verified Views* booklet.

5.4.3 Establishing the Study Area

The Study Area includes the Application Site itself and the wider landscape where the proposed development may have an influence either directly or indirectly. There is no specific guidance on extents of study areas applicable to this type of development. Following site surveys and desktop research, key representative viewpoints were identified though open vantages towards the site are often constrained due to topography, built form and vegetation. However, reference to the wider area is made in relation to landscape character and any connections between this and local and national planning policies and guidance.

5.4.4 Baseline Landscape Assessment Methodology

The baseline study studies extend to include to the wider context into which the proposed development will be introduced. The baseline description of existing conditions forms an objective evaluation of the townscape / landscape character and visual amenity of the study area. This forms the base against which the townscape / landscape and visual effects deriving from the proposed development can be identified, assessed and measured. It involves a desk-top analysis and review of material including:-

- National and Regional Landscape Character or local Landscape Character Assessments;
- Review of historical planning applications on the Application Site;
- Existing National, Regional or Local Designations and relevant Planning Policy;
- Current and historical Ordinance Survey Ireland (OSI) Maps evidence;
- Aerial Photographs via Bing, Google and OSI; and
- Relevant environment / ecology, cultural heritage, historical and archaeology evidence.

The baseline assessment included study of Ordinance Survey Ireland historical and recent mapping to assess how this part of Dundalk has developed since the 19th century as well as allow for calculations of relevant distances or areas.

As part of the baseline assessment, the combination of desk-top analysis and site survey allows a judgment to be made on the key elements that contribute to the landscape character and its wider condition (positive, neutral or negative) and wider value and sensitivity. **See Table 5-2**

Landscape value, quality and sensitivity are affected by factors including:

(i) whether the resource is common or rare;

(ii) whether it is considered to be of local, regional, national or global importance;

(iii) whether there are any statutory or regulatory limitations / requirements relating to the resource;

(iv) the quality of the resource;

(v) the maturity of the resource, and

(vi) the ability of the resource to accommodate changes.

Table 5-2 Determination of Landscape Value and Sensitivity

Terminology	Definition	Summary
Highest Value Landscape	Nationally or regionally important landscape with high quality, highly valued rare or unusual features recognised by designation such as Areas of Scenic Value or World Heritage Sites. Distinct landscapes that exhibit a strong structure and character with valued features that combine to give the experience of scenic quality, tranquillity, rarity and harmony. Negligible pedestrian and traffic conflict.	Very vulnerable to change. *High Sensitivity*
Very Attractive Landscape	Locally or regionally designated landscapes or areas where local evidence indicated as being more valued than the surrounding area.	Some ability to absorb change in some situations without having significant effects. *Medium Sensitivity*
Medium Landscape	"Everyday" or community / undesignated landscapes which may be appreciated by the local community but has no or little wider recognition of its value	Able to accommodate change without significant effects. *Low Sensitivity*
Poor Landscape	Low importance and degraded landscapes with few redeeming features. No evidence of being valued by the community	Able to accommodate change without significant effects. *Low Sensitivity*

This LVIA considers how the proposed development would impact on existing landscape elements and resources which are normally associated with the direct effects on the application site itself. The indirect impacts of the proposed development on the wider landscape are assessed with reference to landscape types or character areas. **See .**

Table 5-3 Magnitude Criteria for Landscape Character Effects

Terminology	Definition
Substantial	Total loss or major alteration to key elements / features / characteristics of the baseline (i.e. pre-development) landscape and /or introduction of elements considered to be totally dominant when set within the attributes of the receiving landscape.
Moderate	Partial loss or alteration to one or more key elements / features / characteristics of the baseline (i.e. pre-development) landscape or view and /or introduction of elements that may be prominent but may not necessarily be considered to be substantially uncharacteristic when set within the attributes of the receiving landscape.
Slight	Minor loss or alteration to one or more key elements / features / characteristics of the baseline (i.e. pre-development) landscape or view and /or introduction of elements that may not be uncharacteristic when set within the attributes of the receiving landscape.

Terminology	Definition
Negligible	Very minor loss or alteration to one or more key elements / features / characteristics of the baseline (i.e. pre-development) landscape or view and /or introduction of elements that are not uncharacteristic with the surrounding landscape - approximating the 'no change' situation.

This is affected by factors including:

- the physical extent and nature of the key elements that make up the proposal;
- the landscape context of these effects; and
- the time-scale of impact, such as whether it is temporary (short, medium or long term), permanent with reversible potentials, or irreversibly permanent.

Table 5-3 Magnitude Criteria for Landscape Character Effects

Terminology	Definition
Substantial	Total loss or major alteration to key elements / features / characteristics of the baseline (i.e. pre-development) landscape and /or introduction of elements considered to be totally dominant when set within the attributes of the receiving landscape.
Moderate	Partial loss or alteration to one or more key elements / features / characteristics of the baseline (i.e. pre-development) landscape or view and /or introduction of elements that may be prominent but may not necessarily be considered to be substantially uncharacteristic when set within the attributes of the receiving landscape.
Slight	Minor loss or alteration to one or more key elements / features / characteristics of the baseline (i.e. pre-development) landscape or view and /or introduction of elements that may not be uncharacteristic when set within the attributes of the receiving landscape.
Negligible	Very minor loss or alteration to one or more key elements / features / characteristics of the baseline (i.e. pre-development) landscape or view and /or introduction of elements that are not uncharacteristic with the surrounding landscape - approximating the 'no change' situation.

In those instances where there would be no change to the landscape, the magnitude is recorded as 'zero' and the level of effect as 'no change.'

5.4.5 Baseline Visual Amenity Assessment

Visual Effects are concerned wholly with the effect of the development on views, along with the general visual amenity and are defined by the Landscape Institute in GLVIA, Paragraph 6.1 which states:-

"An assessment of visual effects deals with the effects of change and development on views available to people and their visual amenity. The concern here is with assessing how the surroundings of individuals or groups of people may be specifically affected by changes in the context and character of views as a result of the change or loss of existing elements of the landscape and/or introduction of new elements."

The baseline studies establish the area from which the proposed development may potentially be visible and the different groups of people ("visual receptors") who may experience views or changes to view context.

Viewpoints are usually identified in locations that are publicly accessible, such as roads, public realm / domain areas, footpaths or publicly accessible heritage sites. Selection is also based on a determination of the extent of visibility towards the proposed development site or from locations where there may be significant numbers of visual receptors who will see the proposed development e.g., known local amenities or residential areas. Viewpoints are chosen to be representative, specific or illustrative and cover as much of the study area as reasonable or necessary and address all areas where there may be changes in terms of views or visual amenity.

Viewer sensitivity is based on the nature of the visual receptor (resident, tourist, commuter etc.) and the visual quality or value attached to a particular view.

Table 5-4 Viewer Sensitivity and Types

Terminology	Definition	Summary of Visual Receptor Type
High	Notable views of heritage assets, quality, valued or scenic landscapes. Views that may be designated or feature in guidebooks, scenic tours, associated with culture, literature and art or an important contributor to experience.	People engaged in outdoor activity whose interest is likely to be focused on the landscape or particular views. e.g. hill-walkers, tourists, scenic tours, users of public rights of way. Residents / Communities living within close proximity of the proposal.
Medium	Ordinary views where the reason for visual receptor to be in the area and does not involve or depend upon an appreciation of the views of the landscape.	Outdoor activity with focus on recreation, sports or water-based activities such as golf, mountain biking, or country sports. Travellers on road and rail.
Low	Areas that may be viewed by the majority as incidental landscapes where the focus of the viewer is on their work or activity and the setting is not important to the visual amenity or quality of working life.	Landowners for proposal. Workers with employment related to construction and management / maintenance activity and likely to have a low interest or appreciation of the view.

The visual effects deriving from the proposed development are based on the combined judgement of the anticipated change in nature, visual amenity and duration of the particular view (magnitude) and the nature of the visual receptor (sensitivity). The magnitude and nature of visual effects are based on a number of factors including:

- Scale of change;
- Contrast in terms of mass, colour, form and texture deriving from new feature(s);
- Extent of intervening vegetation (and seasonality if deciduous) or buildings and topography;
- Speed of passing visual receptor (and how long view is experienced);
- Angle and elevation of view e.g. oblique, direct, perpendicular;
- Nature of backdrop or skyline; and
- Duration of change or effect.

Where mitigation measures are proposed or relevant, these are described as part of any judgement.

Table 5-5 Magnitude Criteria for Visual Effects

Magnitude	Definition
Major	A major change or obstruction of a view that may be directly visible, appearing as the dominant and contrasting feature appearing in the foreground.
Moderate	A moderate change or partial view of a new element within the view that may be readily noticeable, directly or obliquely visible including glimpsed, partly screened or intermittent views, appearing as a noticeable feature in the middle ground.
Slight	A small level of change, affecting a small part of the view that may be obliquely viewed or partly screened and/or appearing in the background landscape. May include moving views at speed. The proposal forms a minor component in the wider view which might be missed by the casual viewer / observer.
Negligible	The proposal is barely discernible or may be at such a distance that it is very difficult to perceive equating to a no-change situation

5.4.6 Nature of Landscape and Visual Effects

The assessment process aims to be objective and quantify effects as far as possible. However, landscape and visual assessment has aspects of it that can be considered subjective. Magnitude of change to a view can be factually defined but any subsequent objective assessment should be based on professional training, experience, observation, evidence and informed opinion.

Table 5-6 Nature of Landscape and Visual Effects

Magnitude	Definition
Positive Effect	A change that improves the quality of the landscape character and fits very well with the existing setting.

Magnitude	Definition
Neutral	A change which does not affect the scale, landform or pattern of the landscape and maintains existing quality.
Adverse Effect	A change which reduces the quality of the landscape and cannot be fully mitigated.

5.4.7 Significance Criteria and Determination

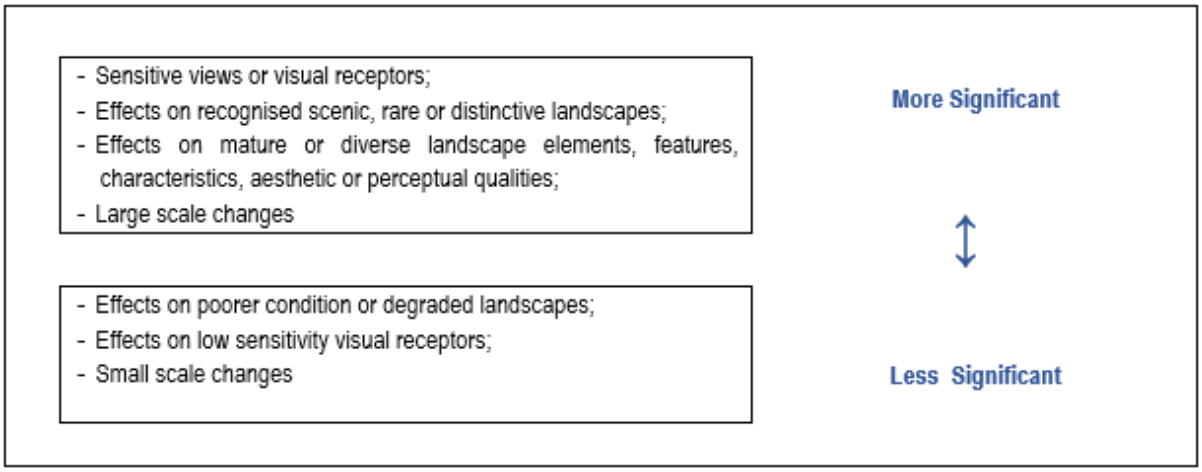
Final judgment is made about which landscape effects are significant. Significance of an effect is determined by the combination of sensitivity of the affected receptor(s) and the predicted magnitude of change which combine to form a level of effect. **See**

The assessment of likely significant environmental effects as a result of the proposed development takes into account the construction and operational phases. The duration of the effect has been assessed as either 'short-term,' 'medium-term' or 'long-term.' Short-term is considered to be up to 1 year, medium-term is considered to be between 1 and 10 years and long-term is considered to be greater than 10 years. Note that this Proposed Development is regarded as being permanent and long-term in LVIA terms.

This LVIA bases 'Significance' of effects on the following definitions:-

- *'Significant' in the Oxford Dictionary 2025 is defined as 'Sufficiently great or important to be worthy of attention; noteworthy.'; and*
- *'Significance' in the GLVIA guidelines 2013 is defined as 'A measure of the importance or gravity of the environmental effect, defined by significance criteria specific to the environmental topic.'*

Table 5-7 Summary Scale of Significance



Significance of visual effects is not absolute and can only be defined in relation to each development and its specific location. Usually an effect is considered 'significant' if the level of effect is 'moderate/substantial' or 'substantial.' The significance of landscape and visual effects is determined by cross-referencing sensitivity of landscape or view with the magnitude of change. **See** Error! R eference source not found..

Table 5-8 Significance Criteria

Magnitude of Change	Landscape and Visual Sensitivity			
	High	Medium	Low	Negligible
High	Substantial	Substantial / Moderate	Moderate	Moderate / Slight
Medium	Substantial/ Moderate	Moderate	Moderate / Slight	Slight
Low	Moderate	Moderate / Slight	Slight	Negligible / No effect
Negligible	Slight	Slight / Negligible	Negligible / No effect	Negligible / No effect

5.4.8 Site Surveys/Investigations

Park Hood have been involved in assessment and work on this site related to landscape matters since November 2022 with the most recent visit being in January 2025. As well as landscape surveys, the works included coordinating with the Tree Surveys by Dr Philip Blackstock and with the project ecologists over this period.

5.4.9 Consultation

A S247 Meeting was held with Louth County Council on 27th November 2024 to review and discuss the proposed development. The key discussions related the material amendments to the previous application, but these primarily related to issues related to drainage, house types and access and were therefore not specifically matters that have any bearing on the LVIA.

A Section 32B Pre-App Meeting was held with Louth County Council on 5th March 2025. There were no specific discussions on LVIA issues but there was a request to consider pedestrian connections on Bóthar Maol (east) including provision of a footpath, crossing and public street lighting that may entail some pruning of adjacent trees to facilitate.

A subsequent Louth County Council Planners Report LRD022 dated 28th March 2025 noted that the *"… submitted Landscape Design Statement and Overall Landscape Proposal drawing prepared by Park Hood provides details of open spaces, landscaping, planting, boundary treatments and play areas. A Landscape Maintenance Plan has also been submitted."*.

Based on the provision of 11.8% of public open space, the Planners Report *"… the overall open space provision on site and the quality of open spaces provided this is considered acceptable"*

The Notice of Opinion by Louth County Council dated 28th March 2025 identified issues relating to site layout (DMURS) and infilling of land and boundary treatments but none of these matters would have any significant bearing on consideration of LVIA matters. There were no specific comments on LVIA issues such as viewpoint selection or existing vegetation.

5.5 Difficulties Encountered

No difficulties were encountered in compiling information for this report.

All feasible and reasonable attempts have been made to ensure that the information provided by a range of public sector institutions and presented in this LVIA is accurate and up-to-date.

5.6 Baseline Environment

The Application Site extends to approximately 18 hectares and is located within the settlement boundary of Dundalk town. It is situated approximately 1.4km to the north of Blackrock village, and 4km to the south-east of Dundalk town centre. **See Figure 5.1**

The site comprises two large and irregularly shaped agricultural fields, divided by a fragmented hedgerow. It is bound by a row of detached bungalows along Bóthar Maol to the north, two detached properties situated off the Blackrock Road to the east and the lands of Dundalk Golf Club to the west.

Some site clearance and construction works including haul roads and foundations for 5 no. dwellings were undertaken in December 2024 / January 2025.

5.6.2 Baseline Landscape Character

Landform, Topography and Drainage

The Application Site generally slopes down to the north and east towards the shoreline of Dundalk Bay from a height of approximately +24m to its south-west to +7m on its eastern edge towards the R172 Blackrock Road. There are no steep slopes or gradients.

There are no watercourses or waterbodies on the Application Site, with all fields naturally draining towards peripheral areas and ditches. No watercourses are shown on any historic OSI maps though land to the east and shoreline are noted as having a potential risk to flooding (Reference Dundalk Local Area Plan 2024-2030). The Blackrock Road (R172) is set between the Application Site and the shallow shoreline of the bay.

Figure 5.2 Site Boundary Map

Land Use and Vegetation

The Application Site comprises two open fields currently in pasture for animal grazing and silage but have also been used for intensive arable farming over the last decade. There is little space left between the field edge and boundary hedgerows. The field structure and use appears to have been comparable since the 19th century based on OSI evidence.

Fields are bound by hawthorn (*Crataegus monogyna*) and blackthorn (*Prunus spinosa*) dominated hedgerows with some sections including colonising scrub such as brier, gorse (*Ulex europaeus*) and extensive ivy (*Hedera helix*) and brier.

Woodland and tree cover on the site is minimal, but the field boundaries are defined by hedgerows within which there are some mature trees, but the core trees of note are to the north of site towards Mountainview House off the Blackrock Road.

The Tree Survey (Dr P Blackstock 2025) noted the following with regards to these trees:-

"Some of the mature trees growing along the boundary of Mountainview house are noted in the first edition Ordnance Survey maps and are now about two hundred years old. These trees have been augmented by additional planting within the last one hundred years or so. Many of the old thorn hedges are also at least two hundred years old. The remaining trees are much younger and have grown

from naturally dispersed seeds or have been planted in adjoining gardens of Golf Course within the last fifty years or so."

Figure 5.3 View from core of the site looking north towards Bóthar Maol and Carlingford Mountains

The Survey also noted that *"Because of their age, some of the older trees growing on this site are now in a poor condition and these should be pruned or felled as detailed in the attached tree survey report sheets. There is also evidence of ash dieback (Hymenoscyphus fraxineus) on site."*

The trees on the land towards Bóthar Maol and the Blackrock Road junction are designated as a tree group of Special Amenity Value. Lands to the south of the site are currently open agricultural fields.

Figure 5.4 View from Application Site looking towards the eastern boundary (Mountain View)

Settlement and Infrastructure

There are no buildings, roads or infrastructure on the Application Site or shown on historic OSI mapping but there are the ruins / structure of an old pump house and container within the overgrown area to the north-east corner. The site can be accessed via a field gate and entrance off Bóthar Maol which is a cul-de-sac leading for approximately 600m from its junction with Blackrock Road (R172) to the east. The narrow lane culminates in a locked field gate approximately 165m to the west, which means there is no access through the N52 Road further to the west.

The site is set on the urban / rural interface with approximately fourteen detached properties aligning Bóthar Maol to the north with rear gardens backing onto the Application site with their boundaries comprising a mix of treatments and vegetation types. The cul-de-sac itself is narrow and characterised by mature trees and hedging to the verges, interspersed with front driveways and lawns associated with low-density residential dwellings set mainly to its south. Beyond Bóthar Maol are the lands of Finnibair Industrial Park.

To the immediate west of the Application Site is Dundalk Golf Club (Established 1922), an 18-hole parkland course set in mature landscaped grounds. The boundary between the course and the Application Site is defined by a mixed quality hedgerow, well established trees and high mesh fence (to restrict golf balls traversing the boundary).

Figure 5.5 View of existing trees on western boundary of the Application Site towards Dundalk Golf Club

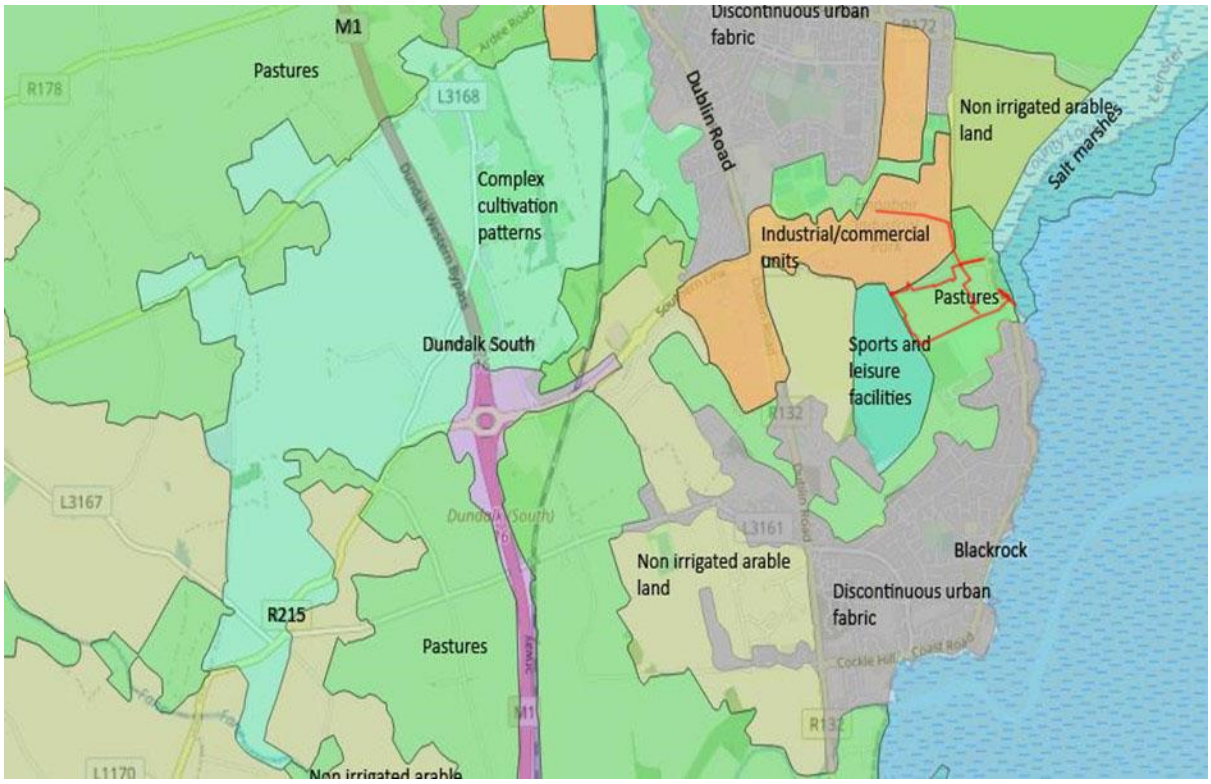
To the east, two large, detached properties at "Mount Gerard" and "Mountain View" off the Blackrock Road (R172) back onto the Application site with their boundaries, defined largely by fencing, mature hedgerows and well-established trees.

Wider Landscape Character

Dundalk (Dún Dealgan) is situated on the Castletown River which flows into Dundalk Bay and was established as a Norman Stronghold in the 12th century, becoming a strategically important outpost and noted walled medieval town. In the late 17th and early 18th century, the Earl of Clanbrassil, James Hamilton demolished the old castles and walls in the area and gave the town a new layout which remains the basis of Dundalk's Street layout as of today.

Dundalk experienced rapid development during the 19th century becoming an important manufacturing and trading centre including brewing, distilling, tobacco, textile and engineering industries. However, during the 20th century, Dundalk experienced decline, with many of these industries closing leading to significant urban decay and high unemployment. However, the 21st century has brought new opportunities, with financial services, technological and pharmaceutical industries relocating to Dundalk and the surrounding area. Dundalk has continued to grow in size in terms of area, population (43,112 in the 2022 Census) and employment; it is the now eighth largest urban area in Ireland. The provision of high-quality road infrastructure and Dundalk's proximity to Dublin has been a major factor in recent local economic development and regeneration.

Figure 5.6 Land Use Map



Source: EPA Geo Portal – Corine Landcover 2018 National

The Application Site, to the south of Dundalk is set between the Finnabair Industrial Park and Loakers housing estate (off the R172 Blackrock Road) and Blackrock village. Finnabair is part of a commercial and industrial landscape extending to approximately 50 hectares to the east and off the N52 Road.

The closest residential areas (aside from those on Bóthar Maol and to the immediate east of the site) are on and off Birches Lane located over 250m to the south of the Application Site. These include generally two storey semi-detached units at Croc na Mara to the south off Birches Lane and older

detached dwellings to its north. To the south east of the core of the site is a cul-de-sac of large, detached dwellings at Village Green which merges into further dwellings along Blackrock Road.

Beaupark comprise a medium sized, medium-high density housing estate set to the north east of Bóthar Maol and east of Finnabair Industrial Estate. Dwellings within are largely terraced to the west and detached to the east and feature a range of designs and finishes.

Blackrock (Na Creagacha Dubha) is a seaside village, with a population of approximately 3000, located less than a kilometre to the south of the Application Site. Originally developed as a fishing village in the early 19th century, it became a popular holiday and seaside destination right up to the 1960s. While that role has declined, it subsequently became a dormitory village for Dundalk and more recently, a commuter town of Dublin. It still retains popularity as a weekend destination, especially during summer months.

The coastline of Dundalk Bay is less than 50m the east of the site, measured from the new entrance on Blackrock Road. The nearest proposed dwellings are located approximately 250m from the coastline, while the proposed crèche is situated at a distance of approximately 220m. Dundalk Bay consists of expansive salt marshes and sandy bays set over a very shallow intertidal area that extends into the bay. To the north is 'The Loakers Marshes' and on the south side there is 'The Fane Estuary and Wetlands' which carry protection / conservation designations due to being important locations for wading birds such as Lapwings, geese and swans.

Figure 5.7 Coastal landscape at Loakers Wetland to the east of the site towards Dundalk Bay

Dundalk Golf Club is located on a slightly elevated site to the south-west and west of the Application Site sitting across an expansive area between Bóthar Maol in the north and Old Golf Links Road to the south. The golf club was founded in 1905 and is typical of a large golf course, including well maintained fairways and greens amongst swathes of mature tree planting including on the boundary towards the Application Site. The clubhouse and associated buildings comprise a relatively modern two storey

building set just over 150m to the south of the Application Site. The elevation allows for open views over Dundalk Bay and on towards the Carlingford Mountains.

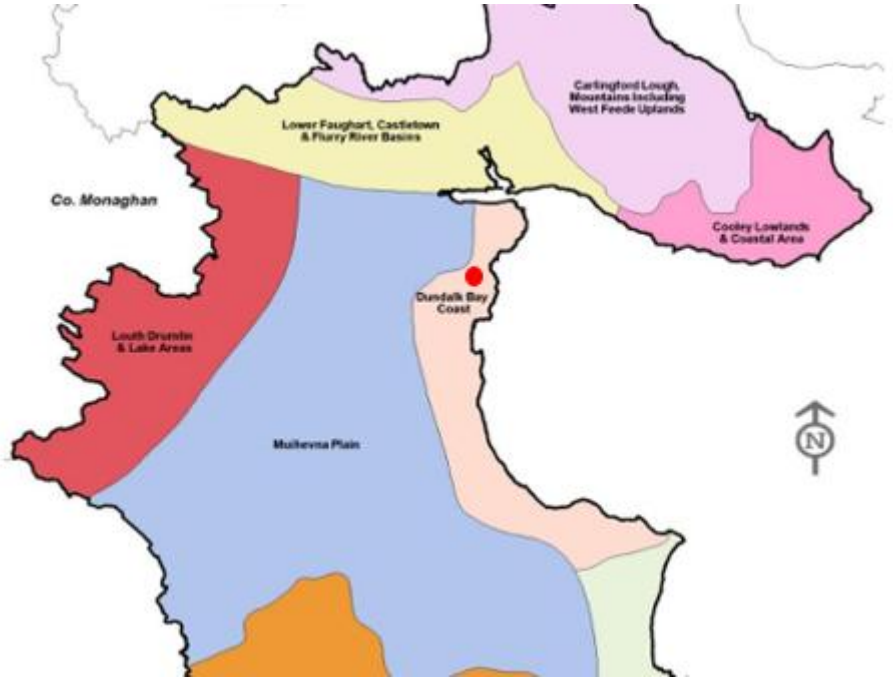
5.6.3 Published Landscape Character

Landscape Character Assessment, Louth County Council, 2002 (LCA)

This LCA while dated, gives a general overview of the landscape character. It notes that Co. Louth has a rich heritage, both built and natural, which contributes substantially to the County's character and identity. On account of an extensive coastline (stretching from Carlingford Lough to the Boyne Estuary), it has an extensive diversity of ecological marine environments, wetlands, woodlands, rivers and upland habitats. Dundalk Bay is an internationally important destination for migratory wildlife, wading birds and is also noted as a highly sensitive landscape.

The Application Site falls within the *Dundalk Bay and Coast* landscape character area, which extends from the Marshes in Dundalk to Dunany Point and varies from 0.5km to 2.5km in width inland from the coastline.

Figure 5.8 Landscape Character Areas



(Source – LCDP 2021-2027 with site location identified by red dot)

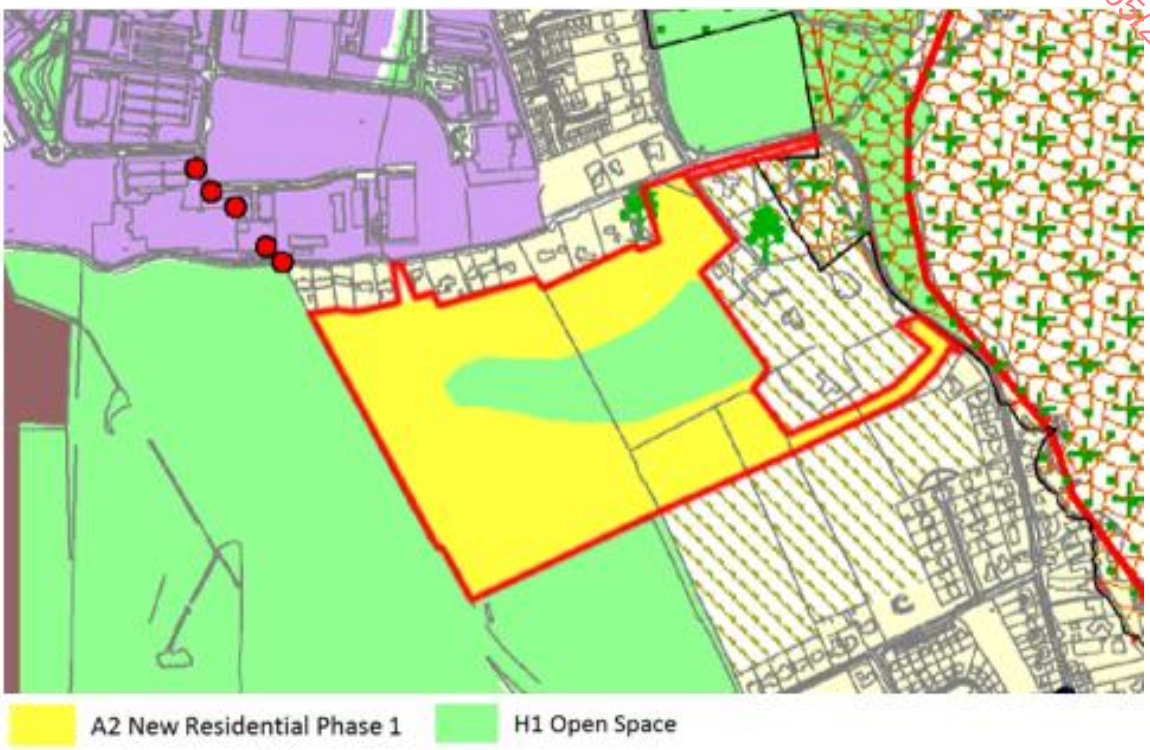
5.6.4 Planning and relevant Landscape Designations

Louth County Development Plan 2021-2027

The Louth County Development Plan 2021-2027 (LCDP) provides the relevant statutory planning context for the Application Site. The following outline policies and objectives relevant to LVIA issues that are relevant to the proposed development.

The Application Site is designated both '*A2 New Residential Phase 1*' and '*H1 – Open Space*'. Just beyond the site to the north-east on Bóthar Maol is an area identified as '*Trees & Woodland of Special Amenity Value*.'

Figure 5.9 Land use Zoning Map Dundalk Composite Map LCDP 2021-2027



The relevant Policy Objectives contained within LCDP 'Chapter 3 – Housing' include the following:-

- Policy HOU 10*: "To continue to support the creation of sustainable communities throughout the County for people across all the life stages by facilitating the creation of attractive neighbourhoods where there are strong links and connections to local services, community services and employment areas and where walking, cycling and public transport is prioritised."*
- POLICY HOU 22: *"To require residential developments to prioritise and facilitate walking, cycling and public transport and to include provision for links and connections to existing facilities and public transport nodes in the wider neighbourhood."*
- POLICY HOU 25: *"To require the provision of high quality areas of public open space in new residential developments that are functional spaces, centrally located, and passively overlooked."*

Relevant Policy Objectives within LCDP 'Chapter 4 – Social and Community' are set out below:

- POLICY SC 17: *"To require the provision of play features that can be used for recreational purposes in all new housing developments exceeding 100 residential units or more."*

- POLICY SC 35: *"To support and facilitate the sustainable provision of childcare facilities in appropriate and suitable locations and seek their provision concurrent with new residential development, all having regard to the Childcare Facilities Guidelines for Planning Authorities (2001) and Childcare Regulations (2006) and any subsequent guidelines, in consultation with the Louth County Childcare Committee. Such facilities will be directed to settlements identified in the Settlement Hierarchy."*

Relevant Policy Objectives contained within LCDP 'Chapter 7 – Movement' are listed below:

- POLICY MOV 9*: "To support investment in sustainable transport infrastructure that will make walking, cycling or public transport more attractive and appealing, and facilitates accessibility for all, regardless of age, physical mobility, or social disadvantage."*

Relevant Policy Objectives contained within 'Chapter 8 – Natural Heritage, Biodiversity and Green Infrastructure' of relevance are as follows:

- POLICY NBG 3: *"To protect and conserve Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) designated under the EU Habitats and Birds Directives."*
- POLICY NBG 14: *"To protect from inappropriate development and maintain the character, integrity and conservation value of those features or areas of ecological interest listed as pNHA or that may be designated as NHA, during the lifetime of this Plan."*
- POLICY NBG 23*: "To ensure the preservation of the uniqueness of a landscape character type by having regard to its character, value and objectives in accordance with national policy and guidelines and the Louth Landscape Character Assessment and by ensuring that new development meets high standards of siting and design and does not unduly damage or detract from the character of a landscape or natural environment.*
- POLICY NBG 24*: "To 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 scenic quality, habitats, settlement pattern, historic heritage and land use."*
- POLICY NBG 25*: "Where appropriate, require that landscape and visual impact assessments prepared by suitably qualified professionals be submitted with development applications, which may have significant impact on landscape character areas, especially in highly sensitive areas."*

LCDP Section 8.11.2 highlights the importance of trees and woodlands in relation to amenity value. The junction of Bóthar Maol and the Blackrock Road (TWSAV94) is designated a tree group of Special Amenity Value. These trees are on the boundary of the Application Site and there are no proposals as part of this development to impact the trees.

Dundalk Local Area Plan 2025-2031

Louth County Council has published the Dundalk Local Area Plan 2025-2031 with the objective it will

provide detailed planning guidance and policy in relation to future development for Dundalk. The following Policy Objectives of most relevance are as follows:

- POLICY SC1: *"To ensure that any development in Dundalk makes a positive contribution to the character, setting and built and natural environment of the town."*
- POLICY SC2: *"To promote and facilitate the creation of a sustainable community in Dundalk in a high quality built environment where there is a distinctive sense of place with attractive streets, spaces, and neighbourhoods that are accessible and safe places for all members of the community to meet and socialise."*
- POLICY SC3: *"To develop and support sustainable neighbourhoods and residential developments in Dundalk that facilitate the provision of the required neighbourhood infrastructure such as schools, recreational amenities, community facilities, healthcare and childcare facilities and a suitable mix of housing at an appropriate density in accordance with the 'Sustainable Residential Development and Compact Settlements Guidelines (DHLGH,2024)"*
- POLICY SC 13: *"To seek that all new residential developments on zoned lands in excess of 20 residential units provide for universally designed units in accordance with the policy objectives outlined the Louth County Development Plan and with the requirements of the 'Universal Design Guidelines for Homes in Ireland' developed by the Centre for Excellence in Universal Design."*
- POLICY SC 25: *"To require the provision of childcare facilities as an integral part of proposals for new residential or mixed-use developments. This requirement shall have regard to the 'Childcare Guidelines for Planning Authorities 2001' and 'Childcare Regulations 2006' and shall be in consultation with the Louth Childcare committee."*
- POLICY SC 26: *"To facilitate the provision of childcare facilities in Dundalk in locations that are compatible with surrounding land uses including in buildings/on land in proximity to community or education facilities or in residential areas, subject to complying with the relevant planning criteria."*
- POLICY SC 34*: "To provide public and private open space in accordance with the provisions for new residential developments in accordance with Sustainable Residential Development and Compact Guidelines for Planning Authorities."*
- *POLICY MOV 2: "To support investment in sustainable transport infrastructure that will make walking, cycling and public transport more attractive and appealing, and facilitate accessibility for all, regardless of age, physical mobility, or economic status."*
- POLICY MOV 11*: "To encourage provision of secure bicycle parking facilities for all types of bicycles (including cargo bikes, trikes, family bikes, and adapted bikes) within the Plan area, including on/off street parling and at key public transport interchanges."*
- POLICY CH 7*: "To ensure the preservation of the uniqueness of Dundalk's sensitive landscape setting by ensuring that new development meets high standards of siting and design and does not unduly damage or detract from the character of a landscape or natural environment."*

- POLICY CH 11*: "To protect Trees and Woodlands of Special Amenity Value except in exceptional circumstance where it can be demonstrated to the Planning Authority that their removal is warranted."*

- POLICY CH 15*: "To prohibit inappropriate development which would interfere with or adversely affect the Coastal Road Scenic route."*

Environmental Designations

Maps available from the Environmental Protection Agency (EPA) indicate no protected landscapes, environment or ecology areas on the Application Site.

Dundalk Bay, located less than 200m distance from the Application Site at the closest point, carries several designations in recognition of its ornithological value. This includes being a Special Area of Conservation and Special Protection Area, a proposed National Heritage Areas (PNHAs) and Ramsar Site.

Built Heritage Designations

The National Built Heritage Service Map Viewer does not indicate any sites or monuments within the boundaries of the Application Site. There are a number of Souterrains to the northeast of the Application Site (LH007-086, LH007-084, LH007-082). There are seven sites included on the Register of Protected Structures (RPS) within 500m of the proposed development.

Within Dundalk town there are eight Architectural Conservation Areas (ACAs), although the site does not fall within any of them. Additionally, there are no designated Historic Gardens or Designed Landscapes in close proximity to the Application Site.

Scenic Designations

The closest Area of Outstanding Natural Beauty and Area of High Scenic Quality are the Carlingford and Feede Mountains located over 8km to the north east. On account of distance, there would be negligible effects to these areas on account of any activity on the Application Site.

Scenic routes along the Coast Road, Annagassan/Salterstown, Seabank/Castlebellingham and through Blackrock Village on the R172 Blackrock Road are noted in the LCA. The Application site is largely screened and concealed from these routes by existing infrastructure, topography and vegetation.

5.6.5 Planning History of the Application Site

Relevant planning applications on this Application Site are as follows:-

- Planning Reference – 304782 Haggardstown, Dundalk, Co. Louth – In October 2019, An Bord Pleanála granted permission for a Strategic Housing Development (SHD, An Bord Pleanála Ref. 304782) for 483 no. residential units (258 no. houses, 225 no. apartments); a childcare facility; and associated site works.

- Planning Reference - 2360476 (ABP Ref.319077) – Haggardstown, Dundalk, Co. Louth – An

application for a Large scale residential development: Construction of 502 residential units, a creche and all associated site works was refused on this site in April 2024.

5.6.6 Landscape Sensitivity

Sensitivity is based on several factors including the landscape's physical landform shape, scale, pattern, its visual environment/enclosure, any sense of remoteness or tranquillity, presence of heritage features, its skyline, inter-visibility with adjacent sensitive areas and the presence of unique or rare features.

The Application Site is situated on the periphery of Dundalk in an area that includes urban, rural and coastal characteristics as evidenced by the fact that within 200m of the site are industrial estates, housing estates, Dundalk Bay, a golf course and farmed fields. The collective influence of Dundalk to the north and Blackrock to the south have ensured that built form and infrastructure is a feature of this area, and the site would not be categorised as sensitive in landscape or visual terms. This was likely to have been a factor in the LCDP designation of these lands for residential development rather than solely for open space or retention as it currently is.

The intensive farming practices employed on this land has resulted in minimal species or landscape diversity apart from the edges of the peripheral hedgerows that would result in a higher category of value or ecological worth. Agriculture has been part of the landscape character and make-up for centuries on account of farming viability and therefore, the site is neither specifically noted or rated as being of one of high landscape sensitivity. The fields have no notable features and would not be considered unique or rare in this part of Ireland. While on this interface, the Application Site displays no visible signs of anti-social behaviour that are often associated with rural landscapes on town edges.

In summary the landscape sensitivity is rated as Medium (i.e. "Everyday" or community / undesignated landscapes which may be appreciated by the local community but has no or little wider recognition of its value). The medium sensitivity correlates with published guidance as per the Landscape Character Mapping by National Parks and Wildlife Service. **See Figure 5.10**

The nearby Dundalk Bay and the associated coastline has been designated as of Regional Importance and of high sensitivity predominantly on account of conservation and natural heritage interest but also due to its scenic quality and this would be a factor in LVIA matters. A key consideration is that views from the shoreline area of Dundalk Bay towards the site are limited due to intervening vegetation, including the designated group of trees at the junction of Bóthar Maol and the Blackrock Road and existing built environment.

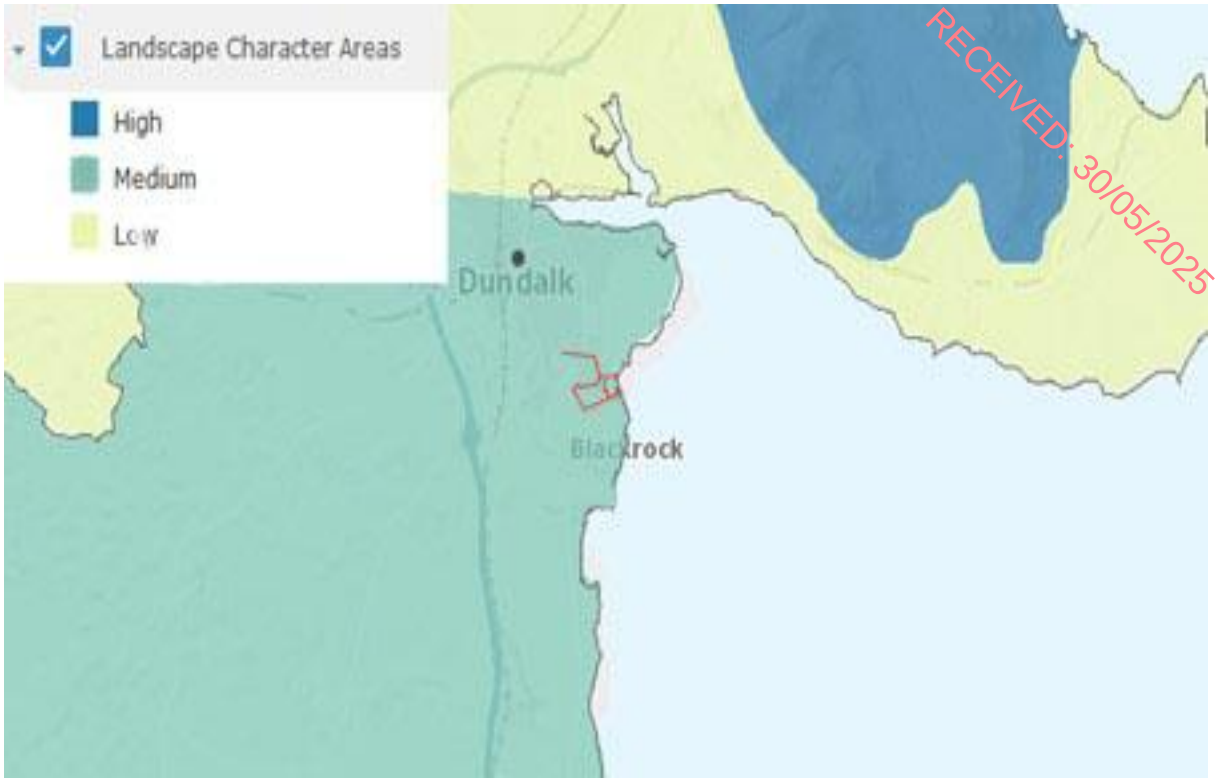


Figure 5.10 Landscape Sensitivity Map

Source: GeoHive Environmental Sensitivity Mapping – National Parks and Wildlife Service

5.6.7 Landscape Quality and Value

The Application Site comprises a set of open fields located to the south of Dundalk town within a landscape characterised by suburban and industrial development to the north and south, a golf course to the west and Dundrum Bay to the east. South Dundalk and the Blackrock area are characterised in part by extensive housing estates that have been built out over the last couple of decades with retail, industrial / commercial and institutional development also being a feature of the emergent townscape. Where the urban edge meets the rural landscape, there are often formal and abrupt boundaries with differing treatments along the jagged periphery. The landscape value and quality is categorised as *ordinary* based on its "everyday" character and undesignated status in landscape or amenity terms.

Figure 5.11 Aerial View of Application Site looking north-east towards Dundalk Bay

Source: Aerial Photograph courtesy of 3D Design Bureau (17/06/23). Note this photograph was before SHD works commenced on site.

The Application Site comprises a rural landscape set on the urban periphery which is largely managed farmland and, in broad terms, the landscape value and quality would be categorised as Medium based on its "everyday" character and undesignated status The gently rolling landscape, while attractive in its own right does not possess many notable features other than hedgerows and a tree belt and it would not be considered unique or rare in this part of Ireland. The cores of the fields are intensely managed arable lands and there is little in the way of any species or landscape diversity away from hedgerows and ditches that would result in a higher category of value.

5.6.8 Representative Views and Visual Amenity

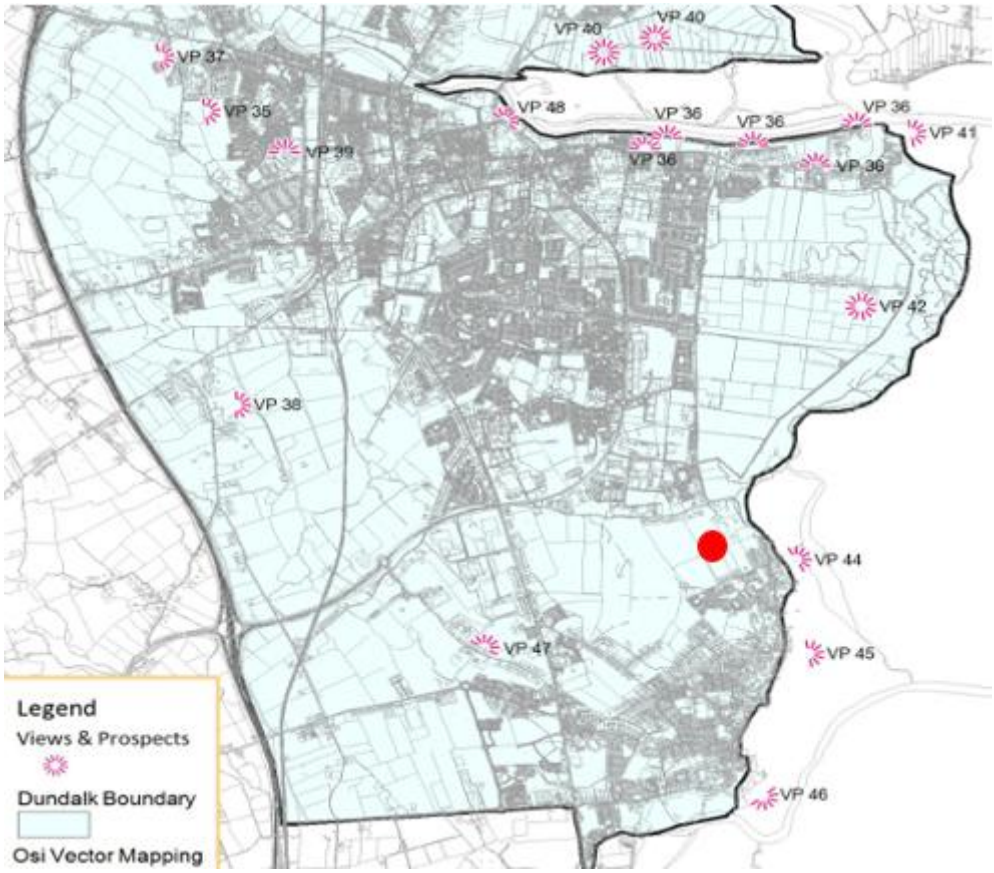
LCDP Section 8.12.3 identifies views and prospects of special amenity value in the county and notes the following:-

> *"Louth has many areas of high quality landscape particularly along the coast…the county boasts many vantage points from which views and prospects of great natural beauty are available. The scenery and landscapes of the County are of enormous amenity value to tourist and residents alike, contributing to quality of life and constating a valuable economic asset. The protection of this asset is therefore of importance in developing the potential of the County. The challenge is to manage the landscape, so any change is positive in its effects thereby ensuring that the landscape is protected."*
>
> *"It is not proposed that this should prohibit development, but rather, where*

development is permitted that it should not hinder or obstruct these views and prospects and be designed and located to minimise impact."

The LCDP identifies 19 protected Views and Prospects within the Dundalk area with the majority located to the north of the Application Site around the Dundalk Harbour and on coastal areas to the east. The proposed development will not intrude on any of these views due to the distance. Any indicative viewpoints do not include the Application Site in their splays or are sufficiently distant.

Figure 5.12 Designated Views and Prospect Map, Dundalk



Source - LCDP 2021-2027 with Application Site indicated by red dot

Blackrock Road (R172) is part of a promoted "Louth Coastal Villages" Scenic Route (SR1) and the site is in close proximity to the section between south Dundalk and Blackrock village. A short transient view will be afforded for passing traffic but the extent of intervening vegetation near the Bóthar Maol junction and around "Mount Gerard" and "Mountain View" ensure these oblique views would not be sustained or of a significant nature. The key views along the coastline and towards the Carlingford mountains would be unaffected. The gently undulating nature of the landscape and extent of peripheral vegetation on the boundaries effectively disguise and mute the site's influence in any mid to distant ground level views or from the vast majority of publicly accessible areas including towards Dundalk Bay.

Representative viewpoints were identified through a combination of contour examination (using OSI mapping and data) and site surveys. These viewpoints are important in determining the indicative visibility of the application site from key locations and likely visual receptors. They were selected at publicly accessible locations, based on the following criteria:-

- Site investigation to establish those locations where there was likely to be significant views (e.g., exposed and elevated landscapes);
- Site investigation to establish those locations where there was likely to be a significant number of visual receptors (e.g., main roads or town areas); and
- Ensuring that key areas in the broader study area are covered to give representative likely visual effect.

The representative viewpoints are as follows, and shown on Figures below.

- Viewpoint 1: Bóthar Maol;
- Viewpoint 2: R172 Blackrock Road near Beaupark;
- Viewpoint 3: Bóthar Maol junction with R172 Blackrock Road;
- Viewpoint 4: R172 Blackrock Road;
- Viewpoint 5: R172 Blackrock Road;
- Viewpoint 6: Village Green, Blackrock;
- Viewpoint 7: Dundalk Golf Club;
- Viewpoint 8: Dundalk Golf Club;
- Viewpoint 9: Annaloughan Loop Walk;
- *Viewpoint 10: Giles Bay*
- Viewpoint 11: R172 Blackrock Road;

Figure 5.13 Representative Viewpoints (Nos. 1-8 and 11)

Figure 5.14 Representative Viewpoints (including Nos. 9 & 10

5.7 The 'Do Nothing' Scenario

The Application Site, located in close proximity to Dundalk would likely remain as an area of agricultural farmland used for arable crops and/or pasture grazing for livestock and as a result any changes in landscape and visual amenity in this case would be negligible. Given that the lands are primarily zoned for residential development, it would be likely that a further planning application for such development would be proposed at some stage though it cannot be predicted how the land-use in the intervening period would affect the implementation of this. Being on the town edge, it may be that farming practices become more difficult for animal management and that its appeal to farming business may decline.

5.8 Potential Significant Effects

5.8.1 Introduction

Any assessment must be measured against that of the situation that pertains at present. In the case of this site, it is – on balance – Medium in terms of landscape quality and condition and Low in terms of landscape sensitivity. The lands have been affected by the close proximity of the town edge and adjacent transport infrastructure and being on a rural/town interface but the fields and peripheral areas have a "Everyday" character which may be appreciated by the local landowners or the low numbers of those who visit these fields but has no or little wider recognition of its value beyond that.

5.8.2 Demolition Phase

5.8.2.1 Landscape

No demolition works are required to facilitate the development apart from the removal of foundations constructed as part of the SHD phase and the removal of the pumphouse ruins which would have no significant landscape or visual effects due to their minor extent.

5.8.2.2 Visual Impact

As before, no demolition works are required to facilitate the development apart from the removal of foundations constructed as part of the SHD phase and the removal of the pumphouse ruins so no visual effects will arise from this phase.

5.8.3 Construction Phase

5.8.3.1 Landscape

The nature of groundworks, construction activity, road building and associated infrastructure will mean that the core of the Application Site will be subject to substantial effects on account of re-grading and profiling works. The elements that will have landscape and visual impacts are as follows:-

- New access to connect to the Blackrock Road (R172) to the east of the site;
- Fixed construction plant, including cranes and scaffolding and gantries;

- Earthworks and ground profiling;
- Underground services installation and drainage including SUDs;
- Replacement and repair of boundary fencing;
- Mobile construction plant, such as excavators and lorries;
- Storage and compound areas;
- Erection of welfare facilities and retention of existing protective hoardings;
- Security and safety lighting; and
- The presence of an evolving development.

In terms of existing trees and vegetation, the following summarises direct impacts to trees and hedgerows as identified, in part, within the Tree Survey (Blackstock 2025):

- Removal of 46 linear meters of internal hedgerow;
- Felling of 18 no trees on health and condition grounds or to facilitate access requirements onto the Blackrock Road (R172);
- Pruning back of trees in the vicinity of the footpath works on Bóthar Maol (Tree No. 59 Sycamore) to assist future pedestrian access and safety. Such trees are very capable of taking management related to pruning of this nature.

The majority of trees requiring felling or monitoring for health on this site are Ash (*Fraxinus excelsior*) with the reason being they are unfortunately suffering Ash die-back (*Hymenoscyphus fraxineus*). None of the vegetation removal would be categorised as significant.

Excavated topsoil, subsoils and rock material will be reused on site where possible equating to approximately 26,500m² of topsoil and a total of 41,500m² of subsoil (related to foundations, attenuation areas, drainage and general cut / fill and site services.

There is likely to be Moderate Adverse effects during the construction period though the most appreciable aspects of this will not be easily discerned from publicly accessible areas and only the new access towards the core of the site from the Blackrock Road (R172) being evident. This section of road is relatively buy thus ensuring effects deriving from construction traffic would not represent a significant change, in landscape or visual terms, from the existing situation; any increased usage will not be significant in landscape and visual terms.

The removal of internal hedgerows will not be significant in landscape terms due to their limited nature and distance from possible vantage points beyond the site itself. As noted above the vast majority of trees in boundary hedgerows and within the site will be retained (subject to on-going health and safety condition surveys).

The construction stage will represent a significant change to the site character and result in direct effects to peripheral areas with Slight Adverse effects on these areas but, in general the site is well contained in visual terms and any landscape effects would not be rated as significant or notable to the wider Dundalk and Blackrock area.

5.8.3.2 Visual Impact

There will be notable and Major visual effects to the core of the site on account of the construction works but these will largely be confined to the site itself and the immediate peripheral areas including Bóthar Maol, parts of the golf course and around the new site entrance off the Blackrock Road (R172).

Towards Dundalk town centre and on coastal areas including Blackrock, the construction phase will have largely Negligible effects on any appreciation of the setting. The collective factors of existing site context, built environment, vegetation and distance ensure any effects would be of a Low Magnitude and not of a significant nature.

5.8.4 Operational Phase

The landscape and visual effects deriving from this proposed development are deemed to be permanent changes (i.e., effects lasting over twenty-five years and irreversible).

5.8.4.1 Landscape

Application Site

The proposal will result in permanent changes to the landscape character of the Application Site due to loss of farmland and internal hedgerows which will be replaced by a built townscape character across this part of the "A2 New Residential" designated lands including buildings, landform changes and boundary treatments that will essentially change its context to a residential and predominantly urbanised area. The proposed development has been designed to follow the principles of this designation and that of the associated open space but has sought to retain key boundary trees and natural features across the site within areas of public open space.

Figure 5.15 Internal Views of the proposed development

Visualisation courtesy of 3D Design Bureau (2025)

The boundary vegetation will be managed in accordance with the recommendations as set out in the Tree Survey (e.g. ivy removed) and these areas augmented to ensure that they continue to feature and be a presence in the Dundalk / Blackrock landscape into the future. The loss of trees and hedgerows should be considered in relation to the proposed landscape works across the quality open spaces and to the central core of the site that will, as it matures, redress and significantly increase the extent of trees and vegetation on the site. The generally low profile of the landscape in this area ensures than any modifications to ground levels related to removal of the internal hedgerow would be of little consequence to the landscape character of this area.

Figure 5.16 Internal Views of the proposed development

Visualisation courtesy of 3D Design Bureau (2025)

The collective development will have Substantial effects to the character and sense of place across the site but would not necessarily be one of an adverse nature on account of the significant landscape and open space development (equating to 26.6% of the Principle site or approximately 11.8% of the Net Developable Area – excluding lands zoned as Open Space) in line with the "A2 New Residential" designation that would contribute to the local landscape character in the medium to longer term. Furthermore, the site is not one that would be considered a pristine landscape or one of an overly sensitive nature due to current land-use, its medium landscape condition / quality rating and location on the urban / rural interface.

Dundalk Town

In areas to the south-east of Dundalk and leading towards Blackrock, there would be a conscious feeling the urbanised form has shifted south beyond the current town edge and that areas perceived as open landscape or farmland have become part of the townscape. Across much of the southern town, the effects will be Negligible due to intervening townscape, commercial buildings, infrastructure

and tree-lined hedgerows on the site boundaries which will remain intact thus visually obscuring the development extent. The new site entrance and road will be a readily discernible change with Moderate effects on a short section of the Blackrock Road (R172) but given the actual residential development is set back over 200m from this area, any impacts deriving from this would be of a Slight and not-significant nature. The design includes for planting of trees and hedgerows in the intervening landscape (and retention of hedgerows on the site periphery) that would have Slight Positive effects by the medium-term offsetting some of the perceived adverse effects deriving from the loss of farmland for urban development in this area.

Residential properties aligning Bóthar Maol and at "Mount Gerard" and "Mountain View" will experience Slight to Moderate Adverse effects in terms of sense of place as the context of the site and backdrop views will include residential areas sitting behind the intervening trees and hedgerows. Any significance and magnitude of effects will reduce over time as the landscape measures mature as the proposal allows for retention and augmentation of existing boundary vegetation.

Figure 5.17 Aerial View of the proposed development

Visualisation courtesy of 3D Design Bureau (2025)

The proposed development will be largely obscured from the local road network (including the Blackrock Road), due to the relatively low profile of the development when set into the receiving landscape type with the accumulation of hedgerows but there will be a conscious feeling or sense that Dundalk has extended. In landscape or visual terms, this would not be rated as a significant change beyond the actual site and any significance or magnitude of effect will reduce over time as the proposed landscape works within the site matures. Effects on the landscape character of Dundalk are assessed as Slight Neutral.

In terms of Dundalk town centre and Blackrock and any of the associated National Inventory of Architectural Heritage (NIAH) listed properties, there will be Negligible Neutral effects. The proposal would have no bearing on any views or townscape character, and it would not result in any lessening of appreciation or enjoyment of its key features, designated or quality areas including the promoted scenic route (SR1) that passes the site on the Blackrock Road.

LCA Dundalk Bay and Coast

There will be Negligible effects on the landscape or character to the vast majority of this LCA due to topography, vegetation and built environment. The proposed development would not change the actual character of the LCA apart from areas near and aside the Application Site as assessed above. There will be Slight effects to areas within south-east Dundalk with the extension of the urban form being discernible, but this would not be something that would be readily appreciable or have a significant effect on any broader appreciation of landscape, setting or context. Effects are rated as Neutral.

The proposal will have a Negligible and neutral effect on the sense of place and would not result in any lessening of appreciation or enjoyment of the more visited or notable landscapes in the LCA areas i.e. Dundalk Bay and its coastline. Any effects should be measured in context with the adjacent cityscape and the Area Plan zoning ensuring this will appear as a logical and appropriate location in landscape (and visual) terms for this type of development.

5.8.4.2 Visual Impact

The following tables summarise the views and context of the 11 no. representative viewpoints and the likely impact on the views and visual quality deriving from the proposed development. The accompanying LVIA verified views (prepared by 3D Design Bureau) include wireframes and photomontages presented at a larger scale from these viewpoints, but the following include extracts for ease of reference.

Table 5-9 Viewpoint 1 - Bóthar Maol

Photomontage courtesy of 3D Design Bureau (2025)

Distance to Site	>0m	**Relevant Designations**	A1-Existing Residential
Viewpoint Sensitivity	Medium	**Visual Receptor Type**	Local Residents
Viewpoint Baseline	Bóthar Maol, a public road / cul-de-sac situated to the north of the application site, is aligned with approximately 14 no. residential properties dispersed along its length located on the urban / rural interface. This viewpoint is taken from the existing field entrance which is currently secured by a set of field gates. The entrance spans approximately 10 meters between two bungalows to the east and west, bordered by mature hedgerows on either side. Views are afforded to the south across an open field with the trees on the boundary of Dundalk Golf Club visible on the horizon.		
Predicted Change	Upon completion, the proposed development will be visible from this location with a number of building facades and roofs visible directly and over hedgerows to the south. The most notable change will be the removal of the field gates and the formalising of this landscape to facilitate the implementation of a new pedestrian and cycle access point to Bóthar Maol,. This would include footpaths aside grass verges and installation of street lighting, trees, and soft landscaping incorporating flower beds that would change it to a narrow area of parkland. This is one of the more open views from Bóthar Maol towards the proposed residential development and the change will have Moderate effects on account of introduction of townscape features into an area previously perceived as largely rural. While a discernible change, it would not have a significant impact given the baseline setting and limited extent of view.		
Significance Summary	Moderate: Proposed development will lead to a partial alteration to the baseline landscape setting but the proposed development will not have a marked effect on existing view quality.		

Table 5-10 Viewpoint 2 - R172 Blackrock Road near Beaupark

Photomontage courtesy of 3D Design Bureau (2025)

Distance to Site	>285m	**Relevant Designations**	None
Viewpoint Sensitivity	Medium	**Visual Receptor Type**	Local Residents, Road Users and Tourists (Scenic Route)
Viewpoint Baseline	Located to the north of the Application Site, this view is from the Blackrock Road (R172) that traverses the lands between the Dundalk Bay coastline and agricultural fields to the east and Loakers Housing Estate to the west (which comprises a mix of detached and semi-detached residential properties). This is the main road between Dundalk and Blackrock village. There are open views to the east over the low coastline but views inland and to the south are restricted by existing built environment and vegetation. The trees to the north-east corner of the Application Site are visible but the majority of the actual site is out of view.		
Predicted Change	The majority of the proposed development will be obscured by the existing built environment and vegetation (even in winter) located within the townscape between this section of Blackrock Road and the Application Site. A partial view of the proposed buildings set to the very north-east of the site will be possible but these will be set behind mature trees in the background of the view and be filtered in winter and obscured in summer months. Their impact on the broader panoramic view will be slight and, while discernible, they would not result in any notable of significant change to the view in this direction which is already characterised by townscape. The proposal will have no effects on the key views from the Blackrock Road leading along the Dundalk Bay coastline area or any impact on where the most appreciable views are afforded.		
Significance Summary	Slight: Proposed development will form a minor component in the view and likely to be missed by the casual viewer / observer.		

Table 5-11 Viewpoint 3 - Bóthar Maol junction with R172 Blackrock Road

Photomontage courtesy of 3D Design Bureau (2025)

Distance to Site	>10m	**Relevant Designations**	None
Viewpoint Sensitivity	Medium	**Visual Receptor Type**	Local Residents, road users and Tourists (Scenic Route)
Viewpoint Baseline	Located at the Blackrock Road / Bóthar Maol junction, this is the closest view to the north from this road between Dundalk and Blackrock of the Application Site. The existing view includes mature trees and woodland group set amongst low-density housing leading away from the junction including along Bóthar Maol and 'Loakers Lodge'. Associated gardens have a mature and settled character that contribute to a degree of containment to views looking east from the road including towards the Application Site. The vast majority of the Application Site is obscured by intervening topography, existing dwellings and dense vegetation.		
Predicted Change	The north-eastern part of the proposed development will be a discernible change to part of the backdrop of this view with a set of two-storey residential properties visible behind and through the wooded area set near the Blackrock Road / Bóthar Maol junction. Any visibility of these properties would reduce appreciably in summer months when this vegetation would be in full leaf. The area is already characterised in part by townscape and the additional housing while evident would not equate to a notable visual impact. Slight changes will be discernible off Bóthar Maol to facilitate a new access and there would be likely more significant pedestrian use of this area. The proposal will have no effects on the key views from this section of Blackrock Road leading along the Dundalk Bay coastline area or any impact on where the most appreciable views are afforded.		
Significance Summary	Slight: Proposed development will form a minor component in the view but have no marked effect on its overall quality.		

Table 5-12 Viewpoint 4 – R172 Blackrock Road

Wireline courtesy of 3D Design Bureau (2025) with development outlined in red

Distance to Site	C10m	**Relevant Designations**	None
Viewpoint Sensitivity	Medium	**Visual Receptor Type**	Local Residents, road users and Tourists (Scenic Route)
Viewpoint Baseline	This viewpoint is from Blackrock Road as it passes the Application Site near the entrances to two properties, 'Plunkett Villa' and 'Mountain View', set between it and the road. This is the main road between Dundalk and Blackrock village. Views in the direction of the Application Site are oblique with it also being obscured by an accumulation of boundary and garden vegetation, mature woodland and trees associated with the intervening properties (even in winter months as demonstrated by the wintertime photograph above). The road is aligned with footpaths with the views to the north, east and west over the coastline of Dundalk Bay being the most appreciable while those inland include areas of built townscape and are more visually contained.		
Predicted Change	The proposed development will be obscured by intervening trees, hedgerows and vegetation set within the lands of intervening properties in this viewpoint direction and effects on this view deriving from the proposed housing associated with this development are rated as Negligible.		
Significance Summary	Negligible: proposal will not be visible equating to a no-change situation.		

Table 5-13 Viewpoint 5 – R172 Blackrock Road

Photomontage courtesy of 3D Design Bureau (2025)

Distance to Site	>0m	**Relevant Designations**	None
Viewpoint Sensitivity	Medium	**Visual Receptor Type**	Local Residents, Road Users and Tourists (Scenic Route)
Viewpoint Baseline	This viewpoint is taken from Blackrock Road, just to the north of Blackrock Village at the location of the proposed entrance to the Application Site so is an area likely to be subject to significant change. The existing view to the west of the road comprises a low stone wall to the back of a footpath beyond which is a remnant (unmanaged) hedgerow and a field that has become colonised, in part, by gorse scrub. Views are afforded "inland" with the trees of Dundalk Golf Club, over 700m distant, visible on the low rising eastern skyline but the core of the Application Site (where housing is proposed) is visually obscured.		
Predicted Change	The changes to this section of Blackrock Road will be of a Substantial nature on account of the major changes to the road layout and removal of vegetation and existing stone wall to facilitate construction of the site access road. The new single carriageway will have associated cycle paths and footpaths set within a tree-lined avenue that will change a broad swathe of the view leading east to one associated with road infrastructure. A bus stop will be located to the north of the entrance. Retained trees and new tree planting will assist in its assimilation into the view but it will represent a significant change to the view and sense of place. The housing development areas are set over 240m distant and will not in themselves have a notable effect on the view.		
Significance Summary	Major. Changes that will be directly visible, appearing as the dominant and contrasting feature appearing in the foreground related primarily to the road junction and associated improvements.		

Table 5-14 Viewpoint 6 – Village Green, Blackrock

Photomontage courtesy of 3D Design Bureau (2025)

Distance to Site	c. 105m	**Relevant Designations**	A1- Existing Residential
Viewpoint Sensitivity	Medium	**Visual Receptor Type**	Local Residents
Viewpoint Baseline	This viewpoint is taken from the northern end of the Village Green, a residential area of generally large two-story properties to the north of Birches Lane and set to the south of the Application Site towards Blackrock village. At the end of the cul-de-sac is an area of open space bound by a close-board timber fence that limits views over the field areas and towards the Application Siteo the north. This is representative of the closest views from residential areas to the south of the site though views towards the actual from publicly accessible areas on Birches Lane and Village Green are largely closed off by intervening buildings, infrastructure and vegetation.		
Predicted Change	Partial views of the upper floor and roofs of new houses located to the south-east of the site (c. 200m distant) will be visible over the intervening fence and change the visual context of the backdrop view from one that has largely rural characteristics to townscape. The key effect will be a sense that the urban townscape of Dundalk has extended south and this will have Slight effects on the visual backdrop and setting of this area. Due to distance and intervening screening elements, the proposal would not have any notable effect on the visual quality and character of the Village Green estate.		
Significance Summary	Slight: Proposed development will form a minor component in the view but would not have a marked effect on its overall quality.		

Table 5-15 Viewpoint 7 – Dundalk Golf Club

Photomontage courtesy of 3D Design Bureau (2025)

Distance to Site	270m	**Relevant Designations**	H1-Open Space
Viewpoint Sensitivity	Medium	**Visual Receptor Type**	Golf Club members / visitors
Viewpoint Baseline	From the upper section of the entrance avenue to the Golf Club off Birches Lane, there are open views across driving range and course areas to the north with the Cooley / Carlingford Mountains visible on the distant skyline and Dundalk Bay visible to the north-east. The Application Site is set behind a field hedgerow and the two fields associated with it and houses within the Bóthar Maol area being out of view. Peripheral built townscape features of Dundalk are visible including roofs associated with warehouses within the Finnabair Industrial Estate as well as a wind turbine to the north-west.		
Predicted Change	Due to close proximity, the proposed development will be a notable addition in the view to the north extending the sense of townscape in this area and having a Moderate effect. The extent of housing visible is limited to the upper floor of those on the southern periphery of the site which are set behind the retained hedgerow which assists in their integration into the view. This change will therefore be more about the sense of place rather than a dramatic shift in the actual view or its content.		
Significance Summary	Moderate: A partial change within the middle ground of the view to the north but would not have a marked effect on its overall quality.		

Table 5-16 Viewpoint 8 – Dundalk Golf Clubhouse

Photomontage courtesy of 3D Design Bureau (2025)

Distance to Site	c. 175m	**Relevant Designations**	H1-Open Space
Viewpoint Sensitivity	Medium	**Visual Receptor Type**	Golf Club members / visitors
Viewpoint Baseline	From Dundalk Golf Clubhouse and associated car park, there are open views to the north and east over, initially, a neat and managed driving range and then on towards the Cooley / Carlingford Mountains visible on the distant skyline and Dundalk Bay. The Application Site is set behind a field hedgerow and the two fields associated with it and houses within the Bóthar Maol area being out of view. Peripheral built townscape features of Dundalk are visible including roofs associated with warehouses within the Finnabair Industrial Estate as well as a wind turbine to the north-west.		
Predicted Change	Due to close proximity, the proposed development will be a notable addition in the view to the north extending the sense of townscape in this area and having a Moderate effect. The extent of housing visible is limited to the upper floor of those on the southern periphery of the site which are set behind the retained hedgerow which assists in their integration into the view. This change will therefore be more about the sense of place rather than a dramatic shift in the actual view or its content.		
Significance Summary	Moderate: A partial change within the middle ground of the view to the north but would not have a marked effect on its overall quality.		

Table 5-17 Viewpoint 9 – Annaloughan Loop Walk

Wireline courtesy of 3D Design Bureau (2025) with development outlined in red

Distance to Site	>7km	**Relevant Designations**	Carlingford and Feede Mountains AONB
Viewpoint Sensitivity	High	**Visual Receptor Type**	Hikers
Viewpoint Baseline	This viewpoint is taken from the Annaloughan Loop Walk on the southern slopes that lead away from the Cooley Mountains from where there are expansive views over Dundalk town, the harbour and Dundalk Bay and on towards Blackrock village. The foreground comprises rough terrain and marginal farmland with scrub vegetation, trees and remnants of tree stumps and beyond that open agricultural farmland. This view is identified as a protected view (VP11) and is referred to as Jenkinstown in the LCDP 2021-2027.		
Predicted Change	The proposed development will be imperceptible due to the distance and the intervening built and natural environment. Negligible visual impacts are predicted.		
Significance Summary	Negligible: proposal will barely discernible equating to a no-change situation		

Table 5-18 Viewpoint 10 – Giles Quay

Wireline courtesy of 3D Design Bureau (2025) with development outlined in red

Distance to Site	8.3km	**Relevant Designations**	None
Viewpoint Sensitivity	Medium	**Visual Receptor Type**	Local Residents
Viewpoint Baseline	This viewpoint is taken from Giles Quay, looking in a west/south-westerly direction across Dundalk Bay towards Blackrock village and Dundalk. The Application Site is not readily distinguishable due to distance and the landscape / townscape in the area being visually merged.		
Predicted Change	The proposed development will be imperceptible due to the distance and the intervening built and natural environment. Negligible visual impacts are predicted.		
Significance Summary	Negligible: proposal will barely discernible equating to a no-change situation		

Table 5-19 Viewpoint 11 – R172 Blackrock Road

Photomontage of junction and wireline with development outlined in red courtesy of 3D Design Bureau (2025)

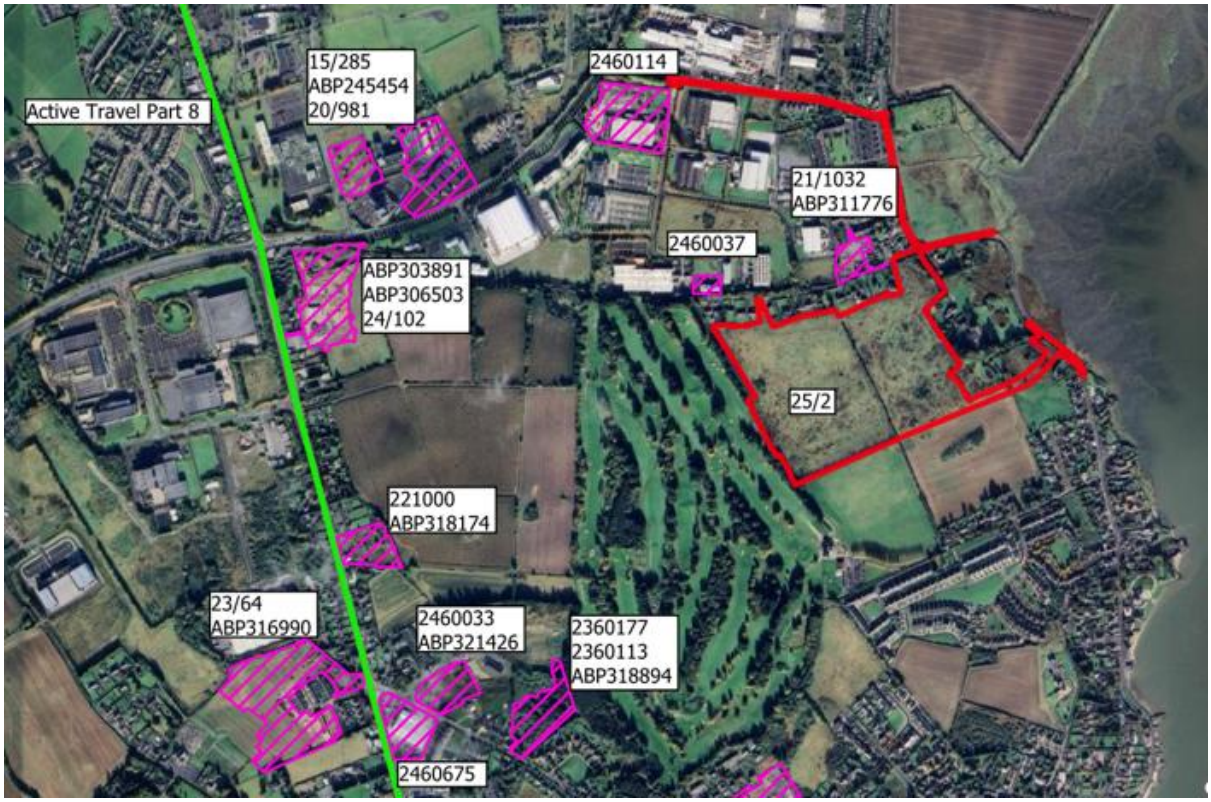
Distance to Site	>0m	**Relevant Designations**	None
Viewpoint Sensitivity	Medium	**Visual Receptor Type**	Local Residents, Road Users and Tourists (Scenic Route)
Viewpoint Baseline	This viewpoint is taken from Blackrock Road, just to the north of Blackrock Village just north of the proposed entrance to the Application Site in an area likely to be subject to significant change due to the proposed access arrangements. The existing view to the west of the road comprises a low stone wall to the back of a footpath beyond which is a remnant (unmanaged) hedgerows and wooded areas. Any (oblique) views towards the core of the site are restricted by the extent of woodland (even in winter months) to the west of the Blackrock Road.		
Predicted Change	The changes to this section of Blackrock Road will be of a Substantial nature on account of the major changes to the road layout and removal of vegetation and existing stone wall to facilitate construction of the site access road. The widened road will open up views to the south and east across the entrance area towards the Birches Lane area (c. 200m distant) and include a new bus stop facility. Retained trees and new tree planting will assist in its assimilation into the view but it will represent a significant change to the view and sense of place. The proposed housing development will be out of view on account of the intervening woodland and vegetation.		
Significance Summary	Major. Changes that will be directly visible, appearing as the dominant and contrasting feature appearing in the foreground related primarily to the road junction and associated improvements.		

5.8.5 Cumulative Effects

Cumulative landscape or visual effects are the combined effects that arise through the interaction of two or more developments, whether of the same type or not, within the landscape and visual baseline context. Collectively they give rise to an overall combined effect.

A significant cumulative effect will occur where the addition of the proposed development to other existing and developments results in a landscape or view that is defined by the presence of more than one major development and is characterised primarily by large scale development so that other patterns and components are no longer definitive.

Figure 5.17 Cumulative Developments Map



Map identifying planning consents and developments in south Dundalk area (courtesy of McCutcheon Halley)

The proposed development is a large-scale residential development that – as noted above – will in isolation result in significant changes to the Application Site and immediate area to the west of Blackrock Road and south of Bóthar Maol. Between the site and the adjacent townscapes or landscapes there is a degree of physical or / and visual separation including towards Birches Lane to the south and towards the Finnibair Industrial Park and Loakers to the north. This part of Dundalk is an area already characterised by industrial parks, housing estates and residential developments with associated infrastructural elements including busy roads. The effects on these areas or south Dundalk and Blackrock deriving from this proposal have been assessed above.

The residential development will add to the residential provision within this part of Dundalk and sense of townscape in this area towards Blackrock. Given the visual separation between the site and nearest proposed developments, cumulative effects are rated as Slight and would be more related to the wider sense of place that specific effects arising from this proposal and other developments in isolation. Consequently, no unacceptable significant impacts will arise from the proposed development in combination with any existing, permitted or

proposed development (as identified in Figure 15.7 above) in the surrounding landscape environment, as outlined in Chapter 1.

5.8.6 Summary

The following Table summarises the identified likely significant effects during the construction phase of the proposed development before mitigation measures are applied.

Table 5-20 Summary of Construction Phase Likely Significant Effects in the absence of mitigation

Area	Sensitivity	Summary	Magnitude	Significance	Significant (Yes / No)
Application Site	Medium	Loss of vegetation and change of baseline setting from open fields to construction site.	Major	Slight Adverse	Major. Yes
Bóthar Maol	Medium	Changes to local sense of place but works mostly screened from these areas	Moderate	Slight Adverse	Major. Yes
Blackrock Village	Medium	Changes to local sense of place but works mostly screened from these areas	Slight	Slight Adverse	Medium. No
Dundalk Golf Course	Medium	Changes to local sense of place but works partially screened from club premises.	Slight / Moderate	Slight Adverse	Medium. No
Dundalk Bay and Coast	Medium / High	Changes to peripheral town edge area from construction works	Slight	Slight Adverse	Low. No.
Dundalk Town	Medium	Changes to peripheral town edge area from construction works	Neutral / Negligible	Neutral / Negligible	Low to Negligible. No.

Table 5-21 Summary of Operational Phase Likely Significant Effects in the absence of mitigation

Area	Sensitivity	Summary	Magnitude	Significance	Significant (Yes / No)
Application Site	Medium	Loss of vegetation and change of baseline setting from open fields to townscape and associated open space.	Major	Slight Adverse	Major. Yes
Bóthar Maol	Medium	Changes to local sense of place but development mostly screened from these areas	Moderate	Slight Adverse	Major. Yes

Area	Sensitivity	Summary	Magnitude	Significance	Significant (Yes / No)
Blackrock Village	Medium	Changes to local sense of place but development mostly screened from these areas	Slight	Slight Adverse	Medium. No
Dundalk Golf Course	Medium	Changes to local sense of place but development partially screened from club premises.	Slight / Moderate	Slight Adverse	Medium. No
Dundalk Bay and Coast	Medium / High	Change of peripheral town edge area to townscape	Slight	Slight Adverse	Low. No.
Dundalk Town	Medium	Change of peripheral town edge area to townscape	Neutral / Negligible	Neutral / Negligible	Low to Negligible. No.

Table 5-22 Summary of Operational Phase Visual Effects in the absence of mitigation

Viewpoint	Location	Sensitivity	Magnitude of Change	Operational Stage Significance & Quality
1	Bóthar Maol	Medium	Medium	Moderate Neutral
2	R172 Blackrock Road / Beaupark	Medium	Slight	Slight Neutral
3	Bóthar Maol / R1272 Blackrock Road junction	Medium	Sight	Slight Neutral
4	R172 Blackrock Road	Medium	Negligible	Negligible
5	R172 Blackrock Road	Medium	Major	Slight Adverse
6	Village Green, Blackrock	Medium	Slight	Slight Adverse
7	Dundalk Golf Club	Medium	Moderate	Slight Adverse
8	Dundalk Golf Club	Medium	Moderate	Slight Adverse
9	Annaloughan Loop Walk	High	Negligible	Negligible
10	Giles Quay	Medium	Negligible	Negligible

5.9 Mitigation Measures

5.9.2 Incorporated Design Mitigation

The proposed development has been designed to take account of the relevant planning designations on this site and is in accordance with the requirements of the Louth County Development Plan 2021–2027. The zoning and policy objectives largely inform the arrangement of the residential layout and core open space based on the following principles:-

- Concentrate development in the A2 Residential Zoned Lands within the northern, western, southern, and eastern part of the site;
- Maintain a significant swathe of open space within the central part of the development in the H1 Open Space Zoned Lands to provide a strategic core of public open space future residents and the existing community alike;
- Maintain the character of the area; and
- Protect key environmental characteristics of the development and the surrounding area include the Dundalk Bay SPA and SAC.

As part of the design process, existing environmental and technical constraints and assets were reviewed with the design team and the landscape design considerations focused on provision of public realm areas, open spaces, playgrounds, and linkages / connectivity within the proposed development site that would be accessible to all members of the community. The objectives include creation of different landscape treatments including avenue tree types and building types to create identifiable character zones.

In terms of Green Infrastructure and Connectivity, the following elements are designed into the proposed development:-

- The main vehicular, cyclist and pedestrian access will be a core spine road that links to the R172 Blackrock Road to the east of the site with a cyclist and pedestrian link through to two locations on Bóthar Maol;
- The main access road through the site, is designed to provide a strong "green" boulevard character that is aligned with parkland areas including avenue trees, landscape areas, broad walking routes and cycleways;
- Off this is a hierarchy of roads and interconnected streets to enable residents, users and visitors to move in a sustainable manner (as alternative options to vehicle trips) to the childcare facility and towards Blackrock Road;
- Link paths across the site will provide a safe environment for walkers, runners and cyclists across the site and to the core and linear open spaces including new pedestrian / cyclist bridges over the ditches where necessary; and
- Landscape areas will be retained and enhanced towards the site boundary and throughout the site to allow for connected habitat creation and wildlife corridors. This will include areas managed for biodiversity and ecosystems that will see a net gain of biodiversity on the site.

In terms of the core Open Space, the following elements are designed into the proposed development:-

- The proposed layout includes significant open space which is interconnected by landscaped links or pedestrian paths that have a functional and aesthetic purpose with a mix of informal and formal landscape character with recreational and amenity spaces. This represents a total of 26.6% of the

Application Site (4.69 ha of a total site of c.18 ha);

- On-going open space management plans will identify areas that can be managed to encourage habitats creation as the designed landscape measures mature and evolve;
- Retention of existing hedgerow to the core of site that will form part of linear public open space;
- All age groups will be catered for with the layout based on best practice in terms of safe and aesthetic design proposals that will complement interaction between varied groups with Universal Design being the overriding consideration. This will include provision of playgrounds to cater for the recreational and educational requirements of children of residents. These will be designed to be both secure and overlooked in line with RoSPA safety advice and European Standard (EN 1176). Playgrounds are located well away from any ESB infrastructure;

Figure 5.18 Proposed Play Areas

- The site layout has been designed in a manner that allows for natural surveillance of all open spaces with houses fronting these areas to give a feeling of security and encourage positive social behaviour;
- The design sets out a clear distinction between public and private spaces;
- Open spaces are designed with consideration given to their long term management ensuring this

is not onerous with heavy resource requirements.

Figure 5.19 Proposed Landscape Works and Setting

5.9.3 Demolition Phase Mitigation

This phase will have Negligible effects on the wider landscape or visual amenity of this area so no mitigation is proposed.

5.9.4 Construction Phase Mitigation

The proposed development will entail significant groundworks to facilitate construction of the residential properties. A key consideration in landscape terms during the construction period is ensuring the provision of a suitable top surface growing medium (i.e. soil) to ensure successful establishment on soft landscape treatments.

During the construction period hoardings are likely to be installed to the construction area to restrict access and views into the site. Publicity material may be displayed on the hoardings to inform the public and passer-by's about the proposed development;

Materials or rock excavated from the existing site will be crushed for re-use where possible thus negating the requirement for import of additional fill. All topsoil will be retained for use on site with much of it being reused in the retained open spaces.

The internal and boundary hedgerows will be managed to remove dead, dying and dangerous

branches and any colonising scrub or brier. The works will also entail removal of trees on site suffering from Ash die-back disease. For retained trees, the recommendations given in BS5837:2012 Guide for trees in relation to construction will be adopted to ensure site and tree safety. Further mitigation measures that are relevant include the following:-

- Retention of boundary vegetation and erection of screen hoarding;
- Additional planting of vegetation along site boundary
- Minimise hedgerow and tree removal and time any canopy reduction or cutting to winter months;
- Construction of the new footpath and crossing on Bóthar Maol will entail Tree Surgeon being engaged with reference to potential impacts on Tree No. 59 Sycamore and requirement in the tree root protection zone for a no-dig solution for the proposed footpath construction; and
- Control of disturbance including dust, mud, noise, lighting.

5.9.5 Operational Phase Mitigation

The appearance of the development is a key influence on how the site is perceived by the public, so the proposed development includes for extensive landscape and open space works with the overall objective of providing a layout that integrates the development into the surrounding landscape and visually blends into the south Dundalk and Blackrock area.

At the core of the site is a large area of public open space which has capacity and scale to accommodate informal and various amenity and landscape / parkland areas. This will be overlooked from the surrounding development to ensure safety in design with multiple connections and access points offered throughout. Further integrated elements relating to the landscape in terms of remediation, mitigation and enhancement include the following:-

- The access road leading into the development from the R172 Blackrock Road will be planted with street trees in broad grass verges and park edge to create a strong green link through the development for motorists, cyclists and pedestrians;
- Public Space (11.8%) includes extensive planting with a mix of native and ornamental tree species to create a natural environment with colour and seasonal interest. The general principle will correspond with LCDP Objectives for Open Space provision with recreational and amenity spaces to the core of the site in a major new parkland space;
- Biodiversity and habitat creation or enhancement will be the objective in terms of landscape design to the site edge and include retention of a key N-S hedgerow to the core of the site;
- The planting of semi-mature trees will give instant impact and provide enclosure and screening. High canopy trees or ones that will be easy to manage are specified to be used along main roads and streets to ensure vehicular sightlines are retained;
- Peripheral parks, pocket parks and internal open spaces are visually linked to the main open space by tree lined streets with the linkages continuing to two connection points on Bóthar Maol and onto the R172 Blackrock Road;
- Provision of playgrounds to cater for the recreational and educational requirements of children of residents;

- The open spaces are designed with consideration given to long-term management ensuring this is not onerous with heavy resource requirements; and
- Due regard has been given with the landscape design coordinating with engineers in terms of Sustainable Urban Drainage Systems (SuDS) as required in terms of swales, compensation areas and retained watercourses or culverts.

The landscape works include for planting of trees within parkland areas and core streets throughout the proposed development that will entail over 600 no. 'semi-mature' or 'extra-heavy standard' size trees to provide an instant impression. The collective trees will, as they mature, assist in merging the proposed development into the surrounding Blackrock and south Dundalk landscape as well as contribute to the creation of the areas new landscape character. Further landscape works include woodland planting (1,285m²), new hedgerows (596 linear meters), and shrub planting (6,855m²).

The planning application is accompanied by a Landscape Management and Maintenance Plan that sets out the objectives for management of the external hard and soft landscape elements of this site within the publicly accessible areas including the main open space and link road to Blackrock Road for a 20 year period. It sets out the management aims and objectives for the Haggardstown development along with the specific management objectives for each landscape component, and the associated maintenance works required on an Annual and Occasional basis.

The extent of planting will more than compensate for the loss of any vegetation on this site and enhance the overall wooded character, biodiversity and ecological nature of the site.

Figure 5.21 Proposed Open Space (correlating with LCDP Open Space Objective)

Planting and augmentation of existing boundary hedgerows will consist of evergreen and deciduous trees with under-story scrub mix. A range of plant species and heights will be selected to provide quick

establishment and assist in visual integration. Amenity planting will consist of trees, native woodlands, hedgerows, shrub / groundcover planting, meadow / wildflower and grass seeding works. As the planting matures, it will change the nature of the site and its visual amenity and the height of planting for assessment purposes is as follows:-

- *Planting at Year 1 : 3 metres;*
- *Planting at Year 15 : 8 metres; and*
- *Planting at maturity : 20 metres (i.e., Year 25)*

Plants selected are predominantly indigenous and species based on those in the "All-Ireland Pollinator Code 2021-2025" to ensure successful plant establishment that will merge visually and ecologically into this area. Landscape works will be undertaken by an ALCI approved landscape contractor and in accordance with BS 4428:1989 Code of practice for general landscape operations (excluding hard surfaces). Any trees or shrubs dying, damaged or removed will be replaced in the following planting session with plant of similar size and species. Trees supply and planting shall correspond to *BS 8545 Trees: from nursery to independence in the landscape - Recommendations*.

While the baseline site character will inevitably change due to this proposal, in terms of woodland and trees the retention of the majority of boundary trees and the new planting provides the opportunity for this part of south Dundalk to have significantly enhanced tree cover and a more wooded character in the longer term with positive effects on amenity, environment and ecology.

5.10 Residual Impact Assessment

5.10.2 Demolition Phase

This phase will have Negligible effects on the wider landscape or visual amenity of this area as the nature of any demolition is so limited.

5.10.3 Construction Phase

There is likely to be temporary Moderate Adverse effects during the construction period though the most appreciable aspects of this will not be easily discerned from publicly accessible areas within the wider Dundalk and Blackrock townscapes or any farmland areas to its south (that would be subject to very few visual receptors). The most appreciable effects will be at the new access to the east onto the R172 Blackrock Road.

5.10.4 Operational Phase

The proposed development is regarded as being permanent or long term in landscape and visual terms. The residual impacts are muted in terms of significance and magnitude on account of the site's generally medium quality and condition rating with this equating to a general medium to low sensitivity rating.

The most appreciable effects relate to the scale and nature of the proposed development which will result in houses and apartments occupying the majority of the site footprint although c.4.69 hectares

will be open space of which c.3.09 hectares comprises strategic amenity space. While having a Major effect, the proposed development, associated parklands, open space and public realm landscapes will have positive effects on the core of the site with significant landscape development and planting that will contribute to the amenity, character and broader environment of this part of Dundalk.

The most notable natural features on the site, namely the mature trees and boundary hedgerows to the north-east and east and key boundary and internal hedgerows will not be impacted. The proposals include for planting over 600 no. standard trees and – in conjunction with more general woodland, shrub and hedgerow planting – this will contribute to far more significant vegetation cover on this site than it had a present.

The low-lying topography and existing vegetation ensure the majority of areas within the Dundalk and Blackrock area will experience no or negligible effects due to the proposal being visually obscured or not being a significant factor in any view or association with any visual amenity provision.

While recognising there are localised significant landscape and visual impacts, the proposed development, while sizeable, can be accommodated and absorbed into this part of south Dundalk without causing any significant detrimental or unacceptable landscape or visual effects.

5.10.5 Summary of Post-mitigation Effects

The following Table summarises the identified likely significant residual effects during the construction phase of the proposed development following the application of mitigation measures.

Table 5-23 Summary of Construction Phase Effects Post Mitigation

Area	Sensitivity	Summary	Magnitude	Significance	Significant (Yes / No)
Application Site	Medium	Loss of vegetation and change of baseline setting from open fields to construction site.	Major	Slight Adverse	Major. Yes
Bóthar Maol	Medium	Changes to local sense of place but works mostly screened from these areas	Moderate	Slight Adverse	Major. Yes
Blackrock Village	Medium	Changes to local sense of place but works mostly screened from these areas	Slight	Slight Adverse	Medium. No
Dundalk Golf Course	Medium	Changes to local sense of place but works partially screened from club premises.	Slight / Moderate	Slight Adverse	Medium. No
Dundalk Bay and Coast	Medium / High	Changes to peripheral town edge area from construction works	Slight	Slight Adverse	Low. No.
Dundalk Town	Medium	Change of peripheral town edge area to townscape	Neutral / Negligible	Neutral / Negligible	Low to Negligible. No.

The following Table summarises the identified likely residual significant effects during the operational phase of the proposed development post mitigation.

Table 5-24 Summary of Operational Phase Effects Post Mitigation

Area	Sensitivity	Summary	Magnitude	Significance	Significant (Yes / No)
Application Site	Medium	New townscape and associated open space.	Major	Slight Positive for Open Space	Major. Yes
Bóthar Maol	Medium	Changes to local sense of place but development mostly screened from these areas	Moderate	Slight Adverse	Major. Yes
Blackrock Village	Medium	Changes to local sense of place but development mostly screened from these areas	Slight	Slight Neutral	Medium. No
Dundalk Golf Course	Medium	Changes to local sense of place but development partially screened from club premises.	Slight / Moderate	Slight Adverse	Medium. No
Dundalk Bay and Coast	Medium / High	Change of peripheral town edge area to townscape	Slight	Slight Adverse	Low. No.
Dundalk Town	Medium	Change of peripheral town edge area to townscape	Neutral / Negligible	Neutral / Negligible	Low to Negligible. No.

5.10.6 Cumulative Residual Effects

The proposed development is a large scale residential development that – as noted above – will in isolation result in significant changes to the Application Site but there is a degree of physical and visual separation between the site and the nearest residential areas in Blackrock to the south and towards the Finnabair Industrial Estate to the north. South Dundalk is an area already defined by housing estates and associated infrastructural elements including busy roads. The effects on these areas or Dundalk deriving from this proposal have been assessed above.

The nearest proposed developments (to the north of Bóthar Maol) are relatively small proposals that would not result in a significant cumulative effect with this proposal. These sites, set within the existing townscape, are effectively separated from the Application Site lands by Bóthar Maol road which acts as a visual screen or buffer between the two areas. Further proposed developments to the north-west, west and south-west and separated from the Application Site by intervening townscape, wooded buffers and the Dundalk Golf Club lands.

There are no other proposed developments in the south-Dundalk area that would have a significant bearings on the magnitude or nature of cumulative effect to local landscape character.

5.11 Risk of Major Accidents or Disasters

This is not relevant to Landscape or Visual considerations.

5.12 Worst Case Scenario

The above Construction Stage assessment is based on a worst-case scenario.

The visual effects of the proposed development are assessed on the basis of photography undertaken for the photomontages / visualisations in bright conditions in winter months (i.e. allowing for maximum visibility). Visual effects can invariably change due to cloud, rainfall, dusk and sun angle that would lead to differences in clarity, colour and contrast. It is therefore reasonable to assume there would be reduced visibility in these scenarios particularly in mid to long distance views. The assessment of effects is based on the worst-case scenario with photography times allowing the proposed development to be as visible as possible in any of the photomontages and visualisations that accompany this chapter.

It was apparent that the thickness of vegetation, particularly to the east of the site towards Blackrock Road and the coastline ensure views of the core of this site are screened on a year-round basis. It is the case that in winter months the sun is generally lower, reducing contrast and therefore potentially reducing visual impact further. The assessment of effects is based on the worst-case scenario throughout and often shows a range of effects with some considered in balance.

5.13 Interactions

Interactions are dealt with in Chapter 16 of this EIAR.

5.14 Monitoring

5.14.1 Construction and Demolition Stage

The management of all areas will initially be undertaken by an ACLI approved landscape contractor with the developer remaining as client for duration of their contract for each section of the development. After 12 months the maintenance will be handed over to the long-term Management Company who will take over maintenance of set areas on completion of the development. There will be a five-year guarantee after construction that all the proposed planting works still exists and has established in line with landscape design expectations. This will ensure that no planting has been removed or damaged due to the subsequent construction or plant failure. The planning application is accompanied by *Landscape Management and Maintenance Plans* by Park Hood, setting out the objectives for management of external spaces or public realm areas for a 20-year period. This would equate to a Negligible and Neutral effect.

5.14.2 Operational Stage

Regular monitoring will be undertaken to determine success of landscape operations and ensure they are behaving in the manner anticipated at design stage. If required, elements of the design can be adapted to accommodate changes required by actual field experience. This would equate to a Negligible and Neutral effect.

5.15 Summary of Mitigation and Monitoring

The following Table summarises the Construction Phase mitigation and monitoring measures.

Table 5-25 Summary of Construction Phase Mitigation and Monitoring

Likely Significant Effect	Mitigation	Monitoring
Construction Works across the site	Set up protective fencing around trees and natural features; Implement dust, erosion, and sediment control measures; and Stage construction to minimize large exposed areas	Minimise hedgerow and tree removal and time any canopy reduction or cutting to winter months. Control of disturbance including dust, mud, noise, lighting.
Existing Trees	Trees and vegetation to be retained within and adjoining the works area will be protected in accordance with the British Standard Institution (BSI) British Standard (BS) 5837:2012 'Trees in relation to design, demolition and construction - Recommendations' (BSI 2012). Works required within the root protection area (RPA) of trees to be retained will follow a project-specific arborist methodology for such works, which will be prepared by a professional qualified arborist.	A professional arborist (Dr Philip Blackstock) is to be retained on site for the duration of the construction works. The Arboricultural Assessment will be updated at the end of the Construction Phase and made available, with any recommendations for on-going monitoring of retained trees during the Operational Phase
Existing Vegetation	Wherever practicable, trees and vegetation will be retained within the Proposed Scheme. Trees and vegetation identified for removal will be removed in accordance with 'BS 3998:2010 Tree Work – Recommendations' (BSI 2010) and best arboricultural practices as detailed and monitored by a professional qualified arborist.	A professional arborist (Dr Philip Blackstock) is to be retained on site for the duration of the construction works and their recommendations in relation to the management of the hedgerows will be undertaken.

The following Table summarises the Operational Phase mitigation and monitoring measures.

Table 5-26 Summary of Operational Phase Mitigation and Monitoring

Likely Significant Effect	Mitigation	Monitoring
Proposed Residential Development	The following mitigation is incorporated into the design. - Layout and setting correlates with LCDP objectives and requirements. No further mitigation is required during the operational phase.	A long-term Management Company will take over maintenance of open space areas on completion of the development.
Open Space	The following mitigation is incorporated into the design. - Public Space (26.6%) includes major planting and development of open spaces including play areas, wooded belts and retention of existing vegetation. Proposed planting will more than compensate for loss of any existing vegetation. No further mitigation is required during the operational phase.	A long-term Management Company will take over maintenance of open space areas on completion of the development.
Entrance Road off Blackrock Road (R172)	The following mitigation is incorporated into the design. - Extensive tree planting and associated landscape works to the verges. No further mitigation is required during the operational phase.	A long-term Management Company will take over maintenance of open space areas on completion of the development.

5.16 Conclusion

The proposed development is regarded as being permanent in landscape and visual terms. The residual impacts are muted in terms of significance and magnitude on account of the site's medium quality and condition rating and this equating to a general low sensitivity rating.

The most appreciable effects relate to the scale and nature of the proposed development which will result in houses and maisonettes occupying the majority of the site footprint although in excess of 26% is to be set out as public open space. While substantial, the proposed development, associated parklands, open space and public realm landscapes will include positive and significant elements that will contribute to the amenity, character and broader environment of this part of Dundalk. The proposals include for major planting works which will contribute to far more significant vegetation coverage on this site than it has at present.

The low-lying topography and existing vegetation ensure the majority of areas within the Dundalk and Blackrock area will experience no or negligible effects due to the proposal being visually obscured or not being a significant factor in any view or association with any visual amenity provision.

While recognising there are localised significant landscape and visual impacts, the proposed development, while sizeable, can be accommodated and absorbed into this part of Dundalk without causing significant detrimental or unacceptable landscape or visual effects.

5.17 References and Sources

This assessment has been carried out in accordance with the current planning policy and guidance and planning policies which cover the study area. There are a number of published guidance documents including Development Plans, which contain relevant statutory planning designations relevant to the study area. These documents are listed below:

- *Louth County Development Plan 2021-2027;*
- *Dundalk Local Area Plan 2024- 2030;*
- *Strategic Environmental Assessment, Dundalk and Environs Development Plan 2021-2027;*
- *Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019 -2031*
- *www.myplan.ie – an initiative of the Department of Environment, Community & Local Government (DECLG)*
- *European Landscape Convention by the Council of Europe (Treaty Series No. 176) (2007);*

Other resources and references include the following:-

- *Louth Landscape Character Assessment 2002;*
- *Corine Land Cover data for Ireland (2018), https://www.epa.ie/pubs/data/corinedata/;*
- *National Inventory of Architectural Heritage;*
- *Historic Environment Viewer - https://maps.archaeology.ie/historicenvironment/;*
- *Natura 2000 Network Viewer, European Environment Agency, 2019 status of the network.*
- *https://www.blackrockvillage.ie/the-heritage-of-blackrock/*
- *https://www.discoverireland.ie/louth/blackrock-wetlands*
- *Explore Louth: Heritage Trail Driving Routes*
- *https://askaboutireland.ie*

Haggardstown LRD

Dundalk, Co. Louth

Main Statement

Volume II

CHAPTER 6

Material Assets: Traffic & Transport

May 2025

McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

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6 Material Assets: Traffic & Transport

6.1 Introduction

This chapter of the EIAR was prepared to assess the potential significant effects of the proposed development on Traffic and Transport. The chapter provides the following:

- An overview of the receiving environment
- A detailed and robust assessment of the potential effects of the proposed development on the local road network both during the short-term construction phase and long-term operational phase
- Outlines mitigation measures to ensure significant effects are minimised or avoided

It should be read in conjunction with the Transport Assessment which also accompanies the planning application.

6.2 Expertise and Qualifications

This Chapter has been prepared by Glen Moon MA (Hons) TPP, a Principal Engineer with SYSTRA. Glen is a Chartered Member of the Chartered Institute of Highways and Transportation, with 17 years of industry experience, specializing in the field of Development Planning, Traffic & Transportation Assessments and EIAR appraisal. In addition, he has spent five years in the renewables industry as an EIA Senior Project Manager.

Glen has recently produced the Traffic and Transport section of the EIARs for the following projects:

- Holy Cross College, Clonliffe, Large-scale Residential Development
- Stoneview Masterplan, Blarney
- Mixed-use development, Kilkenny

6.3 Proposed Development

A description of the site is provided in Chapter 2. The main features of the site design from a transport perspective are:

- Vehicle, cycle and pedestrian access will be from a new priority junction on the R172, to the east of the residential area.
- Improvements will be made at the R172 / Bothar Maol junction to reduce traffic speeds and provide safe pedestrian crossing points.
- A new northbound bus stop on R172 Blackrock Road, close to the site entrance. A future potential southbound bus stop has been designed, but is located outside of the red line boundary, and does not form part of this application. It could be delivered by others at a later date.
- Two further pedestrian and cycle access points will be provided on Bothar Maol. A new footway on the south side of Bothar Maol will provide safe pedestrian between the footpaths on the R172 and the development site.

- There is a comprehensive network of high-quality walking and cycling routes within the subject site, and an extensive set of measures are in place to reduce vehicle speeds and priority.
- A segregated cycleway will link all three access points and also run towards the south-west corner of the development.
- The development will be designed to complement and support future transport initiatives such as the Blackrock to Dundalk Greenway, the NTA's Cycle Connects Scheme and the NTA's Rural Mobility Plan.
- The subject site layout will allow for future transport connections into the potential development site located adjacent to the southern boundary.
- All proposed road and paths within the development will be designed in accordance with the Design Manual for Roads and Streets (DMURS, 2019).

6.3.1 Aspects Relevant to this Assessment

The relevant aspects of the development to this section are:

- The arrangements for construction access, and how this will be managed
- Internal road layout, and provision of cyclists and pedestrians
- The provision of public transport infrastructure, and access to services
- The accessibility of the site to local facilities and services
- The traffic impacts of the proposals

6.4 Methodology

6.4.1 Relevant Legislation & Guidance

This chapter has been prepared having regard to, inter alia, the following guidelines:

- Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EPA, 2022);
- Transport Infrastructure Ireland's (TII's) Traffic & Transport Assessment Guidelines (2014); and
- Institute of Environmental Management and Assessment (IEMA) publication - "Environmental Assessment of Traffic and Movement", 2023 ("the IEMA Guidelines").

There are also a number of relevant national and regional policies which have guided the assessment These include the following documents:

- Project Ireland 2040 – National Planning Framework First Revision (2025)
- Regional Spatial and Economic Strategy for the Southern Region, Project Ireland 2040
- Consolidated Louth County Development Plan (2021 – 2027)
- Draft Dundalk Local Area Plan 2024 – 2030 and associated Local Transport Plan
- National Sustainable Mobility Policy 2022
- Design Manual for Urban Roads and Streets (DMURS, updated 2019); and
- Cycle Design Manual 2023.

6.4.2 Site Surveys/Investigations

The EIAR assessment has been informed by a site visit undertaken by Glen Moon in December 2024. The following site surveys have been undertaken:

- Traffic surveys undertaken on 25th February 2025. These comprised JTC (JTC) surveys at eight junctions.
- An Automatic Traffic Counter that was in place on the R172, at the location of the proposed site access junction. The ATC was in place for a week in March 2023, and recorded traffic volumes and speeds.
- A Bus Capacity Survey that was undertaken in November 2023.

6.4.3 Consultation

6.4.3.1 S247 Transport Scoping Note (October 2024)

SYSTRA submitted a Transport Scoping Note to Louth County Council (LCC), ahead of a Section 247 Pre-Application meeting, which was held with LCC on 29th November 2024.

The Scoping Note summarised the proposed development, and set out a scope of assessment for the Transport Assessment (TA) and EIAR Traffic and Transport Chapter.

6.4.3.2 Meeting with LCC Transport (December 2024)

SYSTRA held a follow-up meeting with LCC's Transport team in December 2024. The main points to emerge from the meeting, in terms of the Traffic and Transport EIAR Chapter, were:

- LCC is content with the proposed scope of assessment, and the intention to re-use the March 2023 traffic survey data.

  Note: SYSTRA has since commissioned updated traffic flows to ensure that this data is as up-to-date as possible.

- The key policy documents against which the scheme will be assessed are:
  - The Consolidated Louth County Development Plan 2021-2027
  - The Dundalk Local Area Plan 2024-2030 (LAP), and associated Local Transport Plan (LTP)

  Note: A detailed review of the transport-related requirements of the above documents is provided in ***Section 2*** *of the Transport Assessment (TA)* submitted under separate cover and prepared by Systra.

- The LAP contains updated proposals relating to Active Travel. The proposed long-distance cycle route from Newry will now run through the development, and new local bus routes are proposed in the area.

  Note: As identified at the meeting, the alignment / specification of proposed cycle routes within the site are suitable for the long-distance cycle route. A revision to policy MOV3 of the Draft LAP has been accepted by the Chief Executive, allowing for the active travel routes crossing the site to be considered to meet the requirements for the Greenway.

- LCC note that the key congested road junctions in the area are the R132 / R172 and R132 / N52 junctions.

  Note: SYSTRA has included assessment of these junctions in the EIAR.

6.4.4 Assessment Methodology and Significance Criteria

6.4.4.1 Assessment of Significance

The UK's Institute of Environmental Management and Assessment (IEMA) '*Environmental Assessment of Traffic and Movement*' (2023) suggest two broad rules to apply to assist in determining the scale and extent of the assessment. The Guidelines suggest that links where traffic (or HGVs) increase by more than 30% should be considered for more detailed assessment, or by 10% in sensitive locations.

As referenced in the IEMA Guidelines, a range of indicators for determining the significance of the relief from severance advises that changes in traffic flow of 30%, 60% and 90% are regarded as producing 'slight', 'moderate' and 'substantial' changes respectively. Additionally, the Guidelines state that it is generally accepted that traffic flow increases of less than 10% on uncongested roads are generally considered to be 'not significant', given that daily variations in background traffic flow may vary by this amount.

The following section sets out the methodology used to assess the significance of effects at locations along the proposed routes within the study area where total traffic levels exceed the screening thresholds set out by IEMA. Where the impact of operational traffic exceeds 30% on any particular link (10% on sensitive links), then a detailed assessment of the significance of effect has been undertaken, which takes account the link sensitivity and the magnitude of change. This will consider the criteria set out in the IEMA Guidelines, such as severance, driver delay, pedestrian delay, pedestrian amenity and safety.

6.4.4.2 Sensitivity

The sensitivity to change in traffic levels of any given road segment, and the receptors located along that road segment, is generally assessed by considering the residual capacity of the network under existing conditions.

Where there is a high degree of residual capacity, the network may readily accept and absorb an increase in traffic and therefore, the sensitivity may be said to be low. Conversely, where the existing traffic levels are high compared to the road capacity, there is little spare capacity, and the sensitivity to change in traffic levels will be considered to be high.

The criteria that have been used to make judgements on the sensitivity of the receptor(s) and the magnitude of change are presented in Table 6.1.

Table 6.1 Framework for determining Sensitivity of Receptors

Sensitivity	Description
High	The receptor / resource has little ability to absorb change without fundamentally altering its present character is of international or national importance.

	Local residents whose daily activities depend upon unrestricted movement within their environment. Receptors such as schools, colleges, hospitals and accident hotspots.
Medium	The receptor / resource has moderate capacity to absorb change without significantly altering its present character, or is of high importance.
Low	The receptor / resource is tolerant of change without detriment to its character, or is of low / local importance. Areas such as trunk road or 'A' class roads constructed to accommodate significant HGV volumes.
Negligible	Users not sensitive to transport effects. Includes very small settlements and roads with no significant settlements including new strategic trunk roads or motorways.

6.4.4.3 Magnitude

The magnitude of effects is a function of the existing traffic volume, the percentage increase and change due to the proposed development, changes in the type of traffic and the temporal distribution of traffic (day of week, time of day).

The determination of magnitude has been undertaken by reviewing the proposed development, establishing the parameters of the receptors that may be affected and quantifying these effects utilising guidelines and professional judgement.

Consideration is given to the composition of the traffic on the road network, under both existing and proposed conditions. For example, LGVs have less effect on traffic and the road system than HGVs. Similarly, HGVs can have less effect than abnormal load vehicles, depending on the frequency of the abnormal loads.

The criteria that has been used to make judgement on the magnitude of the effect on the receptor(s) is presented in Table 6.2.

Table 6.2 Framework for determining Magnitude of Effects

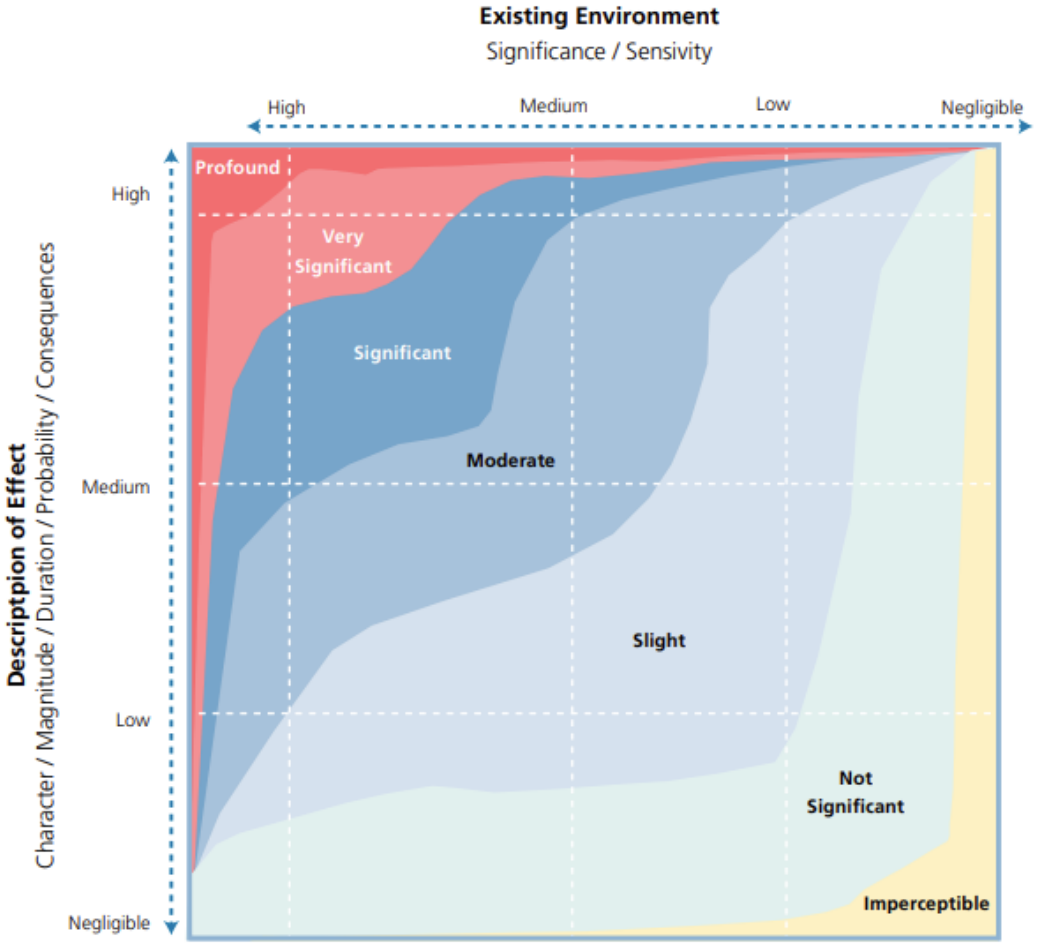
Magnitude	Description
High	Total loss of, or major / substantial alteration to, key elements/features of the baseline (pre-development) conditions such that the post development character/composition/attributes will be fundamentally changed. Generally a rule of >90% (or >70% at sensitive receptors) change in traffic is considered to be a major magnitude.
Medium	Loss or alteration to one or more key elements/features of the baseline conditions such that post development character / composition / attributes of the baseline will be materially changed. Generally, a rule of 60% - 90% (or 40% - 70% at sensitive receptors) change in traffic is considered to be a moderate magnitude.

Low	A minor shift away from baseline conditions. Change arising from the loss / alteration will be discernible/detectable but not material. The underlying character / composition / attributes of the baseline condition will be similar to the pre-development circumstances / situation. Generally, a rule of 30 – 60% (or 10% - 40% at sensitive receptors) change in traffic is considered to be a minor magnitude.
Negligible	Very little change from baseline conditions. Change barely distinguishable, approximating to a 'no change' situation. Generally, a rule of <30% (or <10% at sensitive receptors) change in traffic is considered to be a negligible magnitude.

6.4.4.4 Significance

The criteria used for determining the significance of traffic related effects is set out in **Table 6.3**, which is extracted from the EPA Guidelines.

Table 6.3 Significance of Effects



As per the EPA Guidelines, Significance has been categorised on a seven-point scale, from Profound to Imperceptible. Effects that have a Significance of Effect of 'Significant', 'Very Significant' or 'Profound' are those which have been considered to be **'Significant'**.

6.4.4.5 Potential Environmental Effects

The assessment is structured around the consideration of potential environmental effects relating to traffic and transport. The EPA EIAR guidelines (2022) outlines a number of definitions that can be used to describe potential significant effects. This includes definitions for the quality of effects, significance of effects, extent of effects, probability of effects, duration and frequency of effects and the type of effects. Whilst some of these are easily qualified using the EPA guidelines, the significance of the effects is open to interpretation and relies on the professional engineering judgement. Potential significant effects as identified by the IEMA Guidelines including the following:

- Noise
- Severance
- Driver delay
- Pedestrian delay
- Pedestrian amenity
- Accidents and safety
- Hazardous loads (e. g. nuclear products)
- Dust and dirt

The IEMA guidance suggests that in order to determine the scale and extent of the assessment and the level of effect the Proposed Development will have on the surrounding road network, the following two 'rules' should be followed:

- **Rule 1** – Include highway links where flows are predicted to increase by more than 30% (10% if affecting a sensitive area) or where the number of heavy goods vehicles (HGVs) is predicted to increase by more than 30%
- **Rule 2** – Include any other specifically sensitive area where traffic flows are predicted to increase by 10% or more

Paragraph 2. 5 of the IEMA Guidelines identifies groups, locations and special interests which may be sensitive to changes in traffic conditions as follows:

- People at home
- People in workplaces
- Sensitive groups including children, elderly and disabled
- Sensitive locations, e. g. hospitals, churches, schools, historic buildings
- People walking or cycling
- Open spaces, recreational sites, shopping areas

- Sites of ecological / nature conservation value
- Tourist attractions

The significance of each effect is considered against the criteria within the IEMA Guidelines, where possible, however the guidelines state that:

> *"For many effects there are no simple rules or formulae which define the thresholds of significance and there is, therefore, a need for interpretation and judgement on the part of the assessor, backed-up by data or quantified information wherever possible. Such judgements will include the assessment of the numbers of people experiencing a change in environmental impact as well as the assessment of the damage to various natural resources."*

6.5 Difficulties Encountered

No difficulties were encountered in the production of this chapter.

6.6 Baseline Environment

6.6.1 Site Location

The subject site is situated approximately 1. 4km to the north of Blackrock village, and 3. 7km to the south-east of Dundalk Town Centre. The site is bound by R172 Blackrock Road to the east, and Dundalk Golf Course to the west. Bothar Maol borders the subject site to the north, a lightly-trafficked minor road which provides access to 16 residential properties.

6.6.2 Pedestrian Infrastructure

As a greenfield site, existing footways are currently limited to the roads around the subject site. These include:

- A continuous 2m-wide footway alongside the western kerb of R172 Blackrock Road, that runs past the subject site, north towards Dundalk and south towards Blackrock Village.
- The lightly trafficked Bothar Maol, which forms the northern boundary of the subject site and is a suitable route for pedestrians and cyclists.

6.6.3 Cycling Infrastructure

There is presently a limited amount of cycle infrastructure currently in place in the vicinity of the subject site. This comprises:

- 5m wide cycle tracks on both sides of Dublin Road from north of Dundalk Institute of Technology, stretching to the junction with Hughes Park, approximately 1. 2km to the north
- A 2. 3m-wide segregated cycle track on the eastern side of Tom Bellew Avenue, between Avenue Road and continuing eastbound along Marshes Lower into Dundalk Town Centre

- 5m-wide cycle tracks on both sides of Avenue Road, stretching approximately 1. 2km west from the N52 / Avenue Road Roundabout, beyond Greenacres
- A 4m-wide two-laned cycle path on the western side of the N52 between Glenmore Park and Tom Bellew Avenue

The position of the subject site means that, assuming an average cycling speed of 12 km/hr, all the Dundalk urban area, including the train station, is accessible within a 25-minute cycle journey. This demonstrates the potential for encouraging cycle trips from the development for commuting, commercial and recreational purposes.

6.6.4 Future Pedestrian and Cycle Initiatives

Two future cycle initiatives are proposed that could deliver improvements to pedestrian and cycle infrastructure in the area. These are:

- The proposed Blackrock to Dundalk Greenway, a section of which would be delivered as part of the Dundalk Flood Relief Scheme (FRS). The Greenway would run along the coast, along the route of newly constructed coastal defences. The FRS is being progressed by the Office of Public Works (OPW) and LCC, who appointed consultants in 2021. Subject to the necessary consents, the scheme is expected to start construction in 2027.
- The National Transport Authority's (NTA) 'Cycle Connects: Ireland's Cycle Network' scheme, which intends to deliver a comprehensive cycle network across Ireland. Proposals for each of the 22 counties outside the Greater Dublin Area have been prepared, with an initial round of consultation finishing in November 2022. The NTA is planning to deliver these routes from 2023 onwards, and will complete the network over the timescales of the National Development Plan 2021-2030.

If constructed, the Pedestrian Greenway would greatly improve access for future residents of the development to both Dundalk and Blackrock Village. A revision to policy MOV3 of the LCC's Draft LAP has been accepted by the Chief Executive, allowing for the active travel routes crossing the site to be considered to meet the requirements for the Greenway.

The Cycle Connects proposals suggest an Urban Primary cycle route along the R172 (in addition to the nearby Blackrock to Dundalk Greenway), and a Greenway linking Birches Lane with Bothar Maol. Bothar Maol is identified as a potential east-west Secondary Route.

When implemented, the Cycle Connects proposals will greatly benefit the residents of the Haggardstown site, providing them with access to a coherent network of cycle links to facilitate travel by bike throughout the local area. In turn, the design of the site will aim to incorporate, or complement, these proposals.

6.6.5 Public Transport

6.6.5.1 Bus

A regular bus services runs along R172 Blackrock Road, between Blackrock and Dundalk. This is Halpenny Travel's Route 169, which operates Monday to Friday, between 09:10 and 17:25. There are

seven buses throughout the day. The closest stop to the subject site is at Beaupark, which is 220m north of the R172 / Bothar Maol junction. The journey time into Dundalk town centre is approximately seven minutes.

6.6.5.2 Future Bus Services

The Connecting Ireland Rural Mobility Plan is a major national public transport initiative developed by the National Transport Authority (NTA), with the aim of increasing connectivity, particularly for people living outside our major cities and towns.

The proposals for Dundalk include a new Local Route Proposal (168), which would integrate the existing 161 and 168 bus services, and see an increased frequency of buses between Drogheda and Dundalk, running along the R172 past the subject site.

Connecting Ireland seeks to make public transport for rural communities more useful for more people, and it will do this by:

- Improving existing services
- Adding new services
- Enhancing the current Demand Responsive Transport (DRT) network which meets the transport needs of people who live in remote locations

The proposed service improvements that will directly improve bus services to and from Dundalk are:

- The new 168 Local Route
- Eight new regional corridor proposals, with two leading directly from Dundalk

As a general comment, the Plan notes that, *"The minimum level of service we have identified is a starting point in many cases. Where our analysis demonstrates a warrant for levels of service above the minimum, we will plan to provide that, where funding can be identified. Improvements may be delivered in stages as the project proceeds"*

Service 170, between Cavan and Dundalk, and Service, 166A between Shercock and Dundalk were upgraded in 2023. The remainder of the identified route improvements will be delivered in 2024, 2025 and 2026. It is not yet known when Service 168 between Drogheda and Dundalk will be implemented, but at current delivery rates, this will be in place no later than the end of 2026

These services will enhance bus frequency and capacity for residents of the development.

6.6.5.3 Rail

Dundalk railway station is located to the west of Dundalk town centre, approximately 5km to the northwest of the subject site.

The station is on the Dublin Connolly to Belfast rail line. Regular services operate throughout the week, with typically nine services per day in both directions, with services every 90 to 120 minutes. The journey time between Dundalk and Dublin Connolly is typically 57 minutes, and the journey time between Dundalk and Belfast is typically 73 minutes.

Cycle times to Dundalk Rail Station from the subject site, travelling along the N52 and subsequently the R132, are approximately 13 minutes.

The station can be reached by bus in approximately 25 minutes, which requires walking the final kilometre to the station from St Patrick's Cathedral, which is the nearest stop on the 169 bus route.

The rail station is approximately a nine-minute drive from the subject site, and there are 200 pay and display car parking spaces available for commuters.

6.6.6 Local Road Network

6.6.6.1 N52

The N52 acts as a distributor road for Dundalk, running to the south and east of the town centre and providing access to residential, commercial and employment lands. It also provides access to both main Dundalk interchanges on the M1 Dublin to Belfast motorway.

6.6.6.2 R172

The development will take access onto the R172 Blackrock Road, which is a Regional Road that runs initially east from the R132 Dublin Road at Greengates, before turning north along the coast, and passing through Blackrock. To the north of the subject site, the R172 turns west along the Inner Relief Road to join the N52 in Dundalk.

In the vicinity of the subject site, Blackrock Road is a single carriageway road with a width of ~6. 5m. Within Blackrock, the R172 has a speed limit of 50kph, which changes to 60kph as the road leaves the village, ~100m to the south of the proposed site access junction.

The R172 provides connection with the N52 at three locations via its links with Finnabair Crescent, Hoey's Lane and Avenue Road.

6.6.6.3 Bóthar Maol

Bóthar Maol is a single-track residential access road, which provides access to 16 no. residential properties. Vehicles must pass each other at the driveways located along the road.

6.6.6.4 R132

R132 Dublin Road runs from Dundalk to Drogheda. From the subject site it can be accessed from the R172 / N52 to the north, or the R172 through Blackrock Village to the south.

6.6.6.5 Rock Road / Sandy Lane

To the south of the subject site, Rock Road and Sandy Lane provide access from the R172 into the north and west of Blackrock Village, and to the R132 further west.

6.6.7 Baseline Traffic Flows

Junction Turning Count (JTC) surveys were undertaken on Tuesday 25th February 2025 at the locations shown in Figure 6.1. These locations were agreed with DCC as part of the 2023 LRD application.

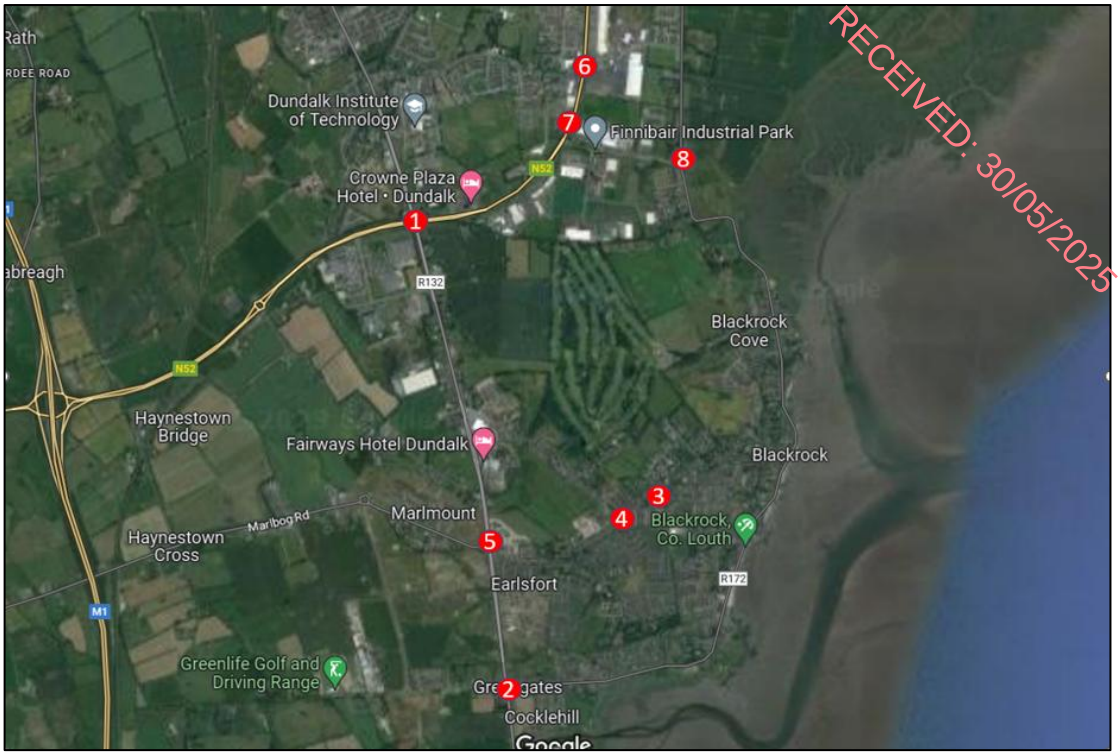


Figure 6.1 Junction Turn Count Locations (Source Google Maps / SYSTRA annotations)

The surveyed junctions were:

1. N52 / R132 signalised junction
2. R132 / R172 Greengates priority junction
3. Rock Road / Sandy Lane priority junction
4. Rock Road / Old Golf Links Road priority junction
5. R132 / Seafield Road / Marlbog Road priority junction
6. N52 / Hoey's Lane roundabout
7. N52 / Finnabair Crescent priority junction
8. R172 Blackrock Road / Finnabair Crescent priority junction

Surveyed peak hour traffic flows were converted into AADT using a factor calculated from a week-long ATC count at the location of the proposed access junction on the R172 in 2023. This location was re-surveyed in February 2025, to confirm the results were still representative.

Resultant AADT flows across the study area were calculated for the links shown in Figure 6.2.

Figure 6.2 Links in the Study Area (Source Google Maps / SYSTRA annotations)

Table 6.4 presents the calculated Base 2025 AADTs for each of the links shown in Figure 6.2, along SYSTRA's classification of the link sensitivity, as per the IEMA Guidelines.

Table 6.4 Base 2025 AADT and Link Sensitivity

Link Ref	Description	Base 2025 AADT (two-way veh)	Sensitive Link (as per IEMA Guidelines)	IEMA Threshold
1	Red Barns Rd north of Avenue Rd	6,604	No	30%
2	R172 between Avenue Rd and Inner Relief Rd	10,432	No	30%
3	R172 between Inner Relief Rd and Finnabair Crescent	9,375	No	30%
4	R172 between Site Access in Finnabair Crescent	8,879	No	30%
5	R172 between Site Access and Rock Road	7,921	Yes – area south of Birch's Lane passes through Blackrock Village	10%
6	R172 between Rock Road and Sandy Lane	4,999	Yes	10%
7	Avenue Road between N52 and R172	6,217	No	30%
8	Inner Relief Road immediately to west of R172	4,909	No	30%

9	Inner Relief Road immediately to east of N52	7,194	No	30%
10	Hoey's Lane to west of N52	8,256	No	30%
11	Finnabair Crescent	3,101	No	30%
12	Rock Road between R172 and Sandy Lane	3,998	Yes	10%
13	Rock Road between Sandy Lane and Old Golf Links Rd	5,070	Yes	10%
14	Rock Rd between Old Golf Links Rd and R132	2,993	Yes	10%
15	Sandy Lane	2,785	Yes	10%
16	Marlbog Rd	4,352	No	30%
17	N52 between Avenue Rd and Inner Relief Rd	10,413	No	30%
18	N52 between Inner Relief Road and Finnabair Crescent	10,437	No	30%
19	N52 south of Finnabair Crescent	11,843	No	30%
20	N52 immediately east of R132	13,104	No	30%
21	N52 immediately west of R132	18,792	No	30%
22	R132 north of N52 junction	11,674	No	30%
23	R132 south of N52 junction	11,532	No	30%
24	R132 north of R172	7,222	No	30%
25	R132 south of R172	8,275	No	30%

6.7 The 'Do Nothing' Scenario

The local roads network has been assessed for the Do-Nothing Scenario and is presented as the 'Base' traffic flows (both current and future year) The results tables in this chapter are set out to to make it easy to make a direct comparison between the 'Base' and 'Base + Development' traffic flows for each of the years

However, as the lands are zoned for development, in the absence of the proposed development proceeding, it is likely that a development of similar nature will proceed in the future in line with national policy and the Development Plan objectives. Therefore, the effects predicated are likely to occur in the future even in the absence of the current proposals.

6.8 Predicted Effects of the Proposed Development

6.8.1 Construction and Demolition Phase

6.8.1.1 Demolition Phase

To facilitate the proposed development, the removal of works completed under a previously permitted SHD development including the foundations for 5 no. houses is required. The ruins of a former pumphouse will also be removed / demolished as part of the works and existing overhead

electrical lines will be undergrounded. It is envisaged that these works will be undertaken as part of the enabling works and site set in Phase 1.

The demolition phase will generate only a small amount of traffic compared to the construction phase, and has therefore not been considered further in this chapter.

6.8.1.2 Construction

Construction traffic will comprise the construction workers (cars) and HGVs / LGVs carrying construction materials.

HGVs will arrive and depart from the site at regular intervals during working hours whilst staff trips to and from the site will generally take place just in advance of the site working hours and following the site close in the evening.

It is anticipated, based on current plans and phasing, that there will be an average of 6 HGV vehicular movements per hour on average, during the working day totalling 40 HGV's a day, during the peak period of construction activity. It is anticipated outside of this peak period the average daily HGV's will reduce to 25 HGVs per day.

In addition, based on current projections, the number of construction workers including sub-consultants is expected to average 75-90 personnel a day. Based upon a typical vehicle occupancy of 3 workers per vehicle, this would result in up to 30 inbound, and 30 outbound, vehicle trips to the site.

It is proposed to restrict HGV deliveries to the most suitable roads, in order to minimise the effect to the local community.

The proposed construction access routes are shown **Figure 6.3** HGVs would travel to and from the site via either the R132 or N52 and use Finnabair Crescent to reach the R172. HGVs would not be permitted to travel through Blackrock Village.

The use of these designated routes can be written into Contractor obligations, and compliance can be assured through observations and monitoring.

Figure 6.3 Construction Routes (Source Google Maps / SYSTRA annotations)

The details of the proposed construction routing will be agreed with LCC, prior to commencement of construction works, with the national road network being used as much as possible.

Table 6-5 shows the predicted daily percentage traffic increase on the road links on the proposed construction routes, conservatively assuming that all traffic travels on each road link. Construction is likely to commence in 2027 or 2028, but for the purposes of the assessment, 2025 flows have been used. This provides a robust assessment, as the predicted percentage impacts will be higher than in future years with higher baseline traffic levels.

Table 6-5 shows that the maximum predicted impact is 3.2% on Finnabair Crescent. On this basis, the effect of construction traffic is considered to be a Low Magnitude of Change. Assuming that the construction routes are of Medium sensitivity, the overall effect is assessed to be negative, likely and short-term, and of **Slight** significance, and therefore **Not Significant** in accordance with the EIA regulations.

Table 6.5 Predicted Construction Traffic Impact

Link Ref	Road Link	Base 2025 AADF	Construction Traffic AADF			% impact
			HGV	Personnel	Total	
4	R172 immediately north of Site	8,879	40	60	100	1.1%

11	Finnabair Crescent immediately to	3,101	40	60	100	3.2%
19	N52 south of Finnabair Crescent	11,843	40	60	100	0.8%
20	N52 immediately east of R132	13,104	40	60	100	0.8%
21	N52 immediately west of R132	18,792	40	60	100	0.5%
11	R132 north of N52 junction	11,674	40	60	100	0.9%
12	R132 south of N52 junction	11,532	40	60	100	0.9%

6.8.2 Operational Phase

Trip Generation

A person trip generation exercise for the proposed development was undertaken as part of the TA and is set out in Section 5 of that document. This calculated the number of daily person trips likely to be generated across a typical weekday by the development. Resultant vehicle trips were calculated by applying the Census 2022 recorded mode share to the total number of person trips. **Table 6-6** shows the predicted vehicle trip generation of the development, based upon the proposed 502 residential units.

Table 6-6 shows that during the AM and PM network peak hours (08:00 – 09:00 and 17:00 – 18:00), the development is expected to generate a total of 257 and 202 two-way vehicle trips, respectively.

The development peak hour is expected to be between 15:00 and 16:00, associated with school pupils returning from school.

Table 6.6 Vehicle Trips

Hour Starting	Number of Vehicle Trips		
	Arrive	Depart	Total
07:00	29	124	153
08:00	54	203	257
09:00	53	65	118
10:00	45	58	102
11:00	49	54	103

12:00	58	55	113
13:00	59	58	116
14:00	60	71	131
15:00	160	72	231
16:00	123	67	191
17:00	133	69	202
18:00	113	68	181
TOTAL	**937**	**962**	**1,899**

Traffic Distribution

New traffic demand to and from the development, as set out in **Table 6-6**, has been distributed through the network based upon the traffic splits observed in the 2025 surveys. This process is detailed in Section 5 of the TA.

Traffic Growth

As set out in the TA, Base 2025 traffic flows were factored to Base 2028 using guidance set out in the 'Project Appraisal Guidelines for National Roads Unit 5. 3', specifically Table 6. 2 'Link Based Growth Rates' for County Louth. The following combined factors were calculated, based upon Central Growth Rates:

- 2025 - 2028 (Year of Opening) – 1. 05
- 2025 – 2043 (YoO + 15) – 1. 20

Modelled Scenarios

Traffic flows have been calculated for the following scenarios:

- Base 2028 (Year of Opening)
- Do Something 2028 (Base + Full Development)
- Base 2043 (Year of Opening + 15)
- Do Something 2043 (Base + Full Development)

The Do Something scenarios represent the Base scenarios, with traffic from the Haggardstown development added.

The development contribution to the future year link flows on the wider local road network is shown in **Table 6-7**. To provide a robust assessment in terms of percentage impacts, it has been assumed that the full development will be completed in 2028 – in reality, assuming typical build-out rates, it is unlikely to be fully built out until 2033.

Table 6.7 Vehicle Trips AADT Link Flows & Development Contribution

Link No.	Location	IEMA threshold	AADT Flows			Dev Flows	Development Contribution (% increase)	
			Base 2025	Base 2028	Base 2045		DS 2028	DS 2045
1	Red Barns Rd north of Avenue Rd	30%	6,604	7,387	8,725	363	5%	4%
2	R172 between Avenue Rd and Inner Relief Rd	30%	10,432	11,403	13,330	839	7%	6%
3	R172 between Inner Relief Rd and Finnabair Crescent	30%	9,375	10,615	12,058	1,029	**10%**	9%
4	R172 between Site Access and Finnabair Crescent	30%	8,879	9,659	11,531	1,301	**13%**	11%
5	R172 between Site Access and Rock Road	10%	7,921	9,160	10,378	1,026	**10%**	9%
6	R172 between Rock Road and Sandy Lane	10%	4,999	5,395	6,164	518	**10%**	8%
7	Avenue Road between N52 and R172	30%	6,217	6,523	7,479	476	7%	6%
8	Inner Relief Road immediately to west of R172	30%	4,909	5,150	5,906	190	4%	3%
9	Inner Relief Road immediately to east of N52	30%	7,194	7,547	8,655	73	1%	1%
10	Hoey's Lane to west of N52	30%	8,256	8,662	9,933	64	1%	1%
11	Finnabair Crescent	30%	3,101	3,485	3,962	272	8%	7%
12	Rock Road between R172 and Sandy Lane	10%	3,998	4,992	5,607	486	**10%**	9%
13	Rock Road between Sandy Lane and Old Golf Links Rd	10%	5,070	6,717	7,497	349	5%	5%
14	Rock Rd between Old Golf Links Rd and R132	10%	2,993	3,499	3,959	209	6%	5%
15	Sandy Lane	10%	2,785	3,543	4,049	0	0%	0%
16	Marlbog Rd	30%	4,352	4,730	5,400	166	4%	3%

Link No.	Location	IEMA threshold	AADT Flows			Dev Flows	Development Contribution (% increase)	
			Base 2025	Base 2028	Base 2045		DS 2028	DS 2045
17	N52 between Avenue Rd and Inner Relief Rd	30%	10,413	11,852	13,453	86	1%	1%
18	N52 between Inner Relief Road and Finnabair Crescent	30%	10,437	11,876	13,482	88	1%	1%
19	N52 south of Finnabair Crescent	30%	11,843	13,583	15,405	201	1%	1%
20	N52 immediately east of R132	30%	13,104	14,906	16,922	201	1%	1%
21	N52 immediately west of R132	30%	18,792	21,295	24,185	168	1%	1%
22	R132 north of N52 junction	30%	11,674	12,076	13,690	32	0%	0%
23	R132 south of N52 junction	30%	11,532	12,899	14,674	67	1%	0%
24	R132 north of R172	30%	7,222	8,102	9,214	0	0%	0%
25	R132 south of R172	30%	8,275	9,337	10,610	421	5%	4%

The figures in **Table 6-7** indicate that the proposed development would not cause an increase in total traffic above 30% (IEMA Rule 1 Threshold) on any link in the study area.

Four links are predicted to experience an increase in flow of 10% or more. These are:

- Link 3 – R172 between Inner Relief Road and Finnabair Crescent
- Link 4 – R172 between Site Access and Finnabair Crescent
- Link 5 – R172 between Site Access and Rock Road
- Link 6 – R172 between Rock Road and Sandy Lane
- Link 12 - Rock Road between R172 and Sandy Lane

Of the above, Links 5, 6 and Link 12 are considered sensitive receptors due to their location in Blackrock, and therefore require further detailed assessment, which is provided below.

Links 3 and 4 (R172 between Inner Relief Rd and Finnabair Crescent and R172) have also been considered in the detailed assessment. Although not considered by SYSTRA to be sensitive in terms of human receptors, they do run adjacent to the Dundalk Bay SAC and SPA, so could be considered sensitive from an ecological perspective.

As they form a continuous route, Links 3, 4, 5 and 6 have been considered together in the assessment below.

6.9 Potential Significant Effects

6.9.1 Severance

The IEMA Guidelines advise that "*Severance is the perceived division that can occur within a community when it becomes separated by a major traffic artery*".

The potential for traffic associated with the proposed development to cause severance is assessed on a case-by-case basis using professional judgement where traffic increases are predicted on roads through residential settlements.

Increased severance can result in the isolation of areas of a settlement or individual properties. Severance may result from the difficulty of crossing a heavily trafficked road or a physical barrier created by the road itself. Severance effects could equally be applied to residents, motorists or pedestrians.

Links 3, 4 5 and 6 - R172 between Inner Relief Road and Sandy Lane

With reference to **Table 6-2**, the magnitude of change in total traffic on Links 3, 4, 5 and 6 is considered to be Low as the predicted increases are between 10% and 40%.

With reference to **Table 6-1**, the sensitivity of the R172 to changes in traffic levels is considered to be Low to Medium for severance. Links 3 and 4 only have development on the west side of the R172, but the R172 between the edge of Blackrock and Sandy Lane is more urban in nature, and has development on both sides of the road.

When the Low magnitude of effect is combined with the Medium sensitivity of the receptor in accordance with **Table 6-3**, it can be concluded that there will be a negative, likely, long-term, **Slight** severance effect, which is considered to be **Not Significant** in accordance with the EIA Directive.

Link 12 - Rock Road between R172 and Sandy Lane

With reference to **Table 6-2**, the magnitude of change in total traffic on Link 12 on Rock Road is considered to be Low as the increase in both is between 10% and 40%, considering Blackrock is a sensitive receptor.

With reference to **Table 6-1**, the sensitivity of Link 12 on Rock Road to changes in traffic levels is considered to be Low for severance, as although a number of residential properties are located along the link, no footway is present.

When the Low magnitude of effect is combined with the Low sensitivity of the receptor in accordance with **Table 6-3**, it can be concluded that there will be a negative, likely, long-term, Slight severance effect, which is considered to be **Not Significant** in accordance with the EIA Directive.

6.9.2 Driver Delay

IEMA Guidelines advise "*delays are only likely to be significant when the traffic on the network surrounding the development is already at, or close to, the capacity of the system*".

Additional delay to non-development traffic will occur at several points on the road network in the vicinity of the subject site, including:

- At the R172 / Site access junction, where there will be additional turning movements;
- At junctions along the local road network which might be affected by increased traffic; and
- At side roads where the ability to find gaps in mainline traffic may be reduced, thereby lengthening delays.

Links 3, 4 5 and 6 - R172 between Inner Relief Road and Sandy Lane

With reference to **Table 6-2**, the magnitude of change in total traffic on Links 3, 4, 5 and 6 is considered to be Low as the increase in both is between 10% and 40%, considering Blackrock and the SPA as sensitive receptors.

The sensitivity of all road links to an increased driver delay effect is considered to be Low in accordance with **Table 6-1,** as there are few junctions and therefore potential locations where other road users may be delayed. Furthermore, the Baseline AADF of the road links is low, thus, there is sufficient available capacity to accommodate additional vehicle movements without causing delay to other road users.

Combining the Low magnitude of the change with the Low sensitivity of the receptor in accordance with **Table 6-3** equates to an effect which is classed as negative, likely, long-term, Slight and **Not Significant** as per the EIA Directive.

Link 12 - Rock Road between R172 and Sandy Lane

With reference to **Table 6-2**, the magnitude of change in total traffic on Link 12 at the eastern extent of Rock Road is considered to be Low as the increase in traffic is between 10% and 40%, considering Blackrock is a sensitive receptor.

The sensitivity of the road link to an increased driver delay effect is considered to be Low in accordance with **Table 6-1** as there are very few junctions and therefore potential areas for delaying of other road users. Furthermore, the AADF of the road link is low, thus, there is sufficient available capacity to accommodate additional vehicle movements without causing delay to other road users.

Combining the Low magnitude of the change with the low sensitivity of the receptor in accordance with **Table 6-3** equates to an effect which is classed as negative, likely, long-term, Slight and **Not Significant** as per the EIA Directive.

6.9.3 Pedestrian Delay and Amenity

Traffic volume, composition, speed, pedestrian footways and crossings all contribute to the level of general pleasantness, fear, intimidation and delay experienced by pedestrians and other vulnerable road users.

Links 3, 4 5 and 6 - R172 between Inner Relief Road and Sandy Lane

Links 3 and 4, and the northern section of Link 5, between the site entrance and the northern edge of Blackrock, are suburban and nature, and provide access to a limited number of residential properties and housing estates. To the south of this point, i.e. the southern part of Link 5 and all of Link 6, the roads become urban in nature, and Sandy Lane is at the centre of Blackrock Village.

It is considered that the sensitivity of Links 3 and 4 to pedestrian delay and amenity is Low, and the sensitivity of Links 5 and 6 is Medium.

Combining the Low magnitude of the effect with the medium sensitivity of the location in accordance with the matrix in **Table 6-3**, it is considered that increased traffic associated with the proposed development will have a negative, likely, long-term, Slight effect on pedestrian delay and amenity. This effect is assessed as **Not Significant** in accordance with the EIA Directive.

Link 12 - Rock Road between R172 and Sandy Lane

Link 12 at the eastern extent of Rock Road is fronted by a number of residential properties, and although no footway is present, it can be expected that pedestrians will still use this route to access the centre of Blackrock Village.

Given the nature of the area, it is considered that the sensitivity of this location to pedestrian delay and reduced amenity effect is Medium.

Combining the Low magnitude of the effect with the Medium sensitivity of the location in accordance with the matrix in **Table 6-3**, it is considered that increased traffic associated with the proposed development will have a negative, likely, long-term, Slight effect on pedestrian delay and amenity. This effect is assessed as **Not Significant** in accordance with the EIA Directive..

6.9.4 Accidents and Safety

A calculation has been undertaken to quantify the increased level of accident risk that could be expected due to an increase in traffic associated with the proposed development. This has been undertaken using accident rates for different link types set out in DMRB. SYSTRA requested local accident data from both LCC and the Road Safety Authority (RSA), but, as documented in the TA, neither body is able to share accident data at present, due to GDPR issues.

The likelihood of an accident occurring is commonly expressed in terms of 'accidents per million vehicle-km'. Accidents that are appraised in relation to transport are predominantly those in which personal injury is sustained by those involved (personal injury accidents (PIAs)).

Links 3,4,5 and 6, between proposed the Inner Relief Road and Sandy Lane are a combined total of approximately 3.6km in length, Link 12, Rock Road immediately to the west of the R172 is approximately 800m in length. Both roads can be classified as 'urban typical single carriageway' in accordance with the criteria set out within DMRB. Accident rates from the DMRB for this standard of road are:

- Urban typical single carriageway: 0. 844 PIA per million vehicle km.

The calculated annual change in predicted PIAs on each link as a result of the development are as follows:

Links 3, 4 5 and 6 - R172 between Inner Relief Road and Sandy Lane

The annual calculated increase in PIA as a result of the development is 1.1 PIA per year. It is considered that the magnitude of this effect is Low, but receptor sensitivity to this effect is always considered as High. When combined, the effect can be classified as negative, likely, long-term, Slight and **Not Significant** in terms of the EIA Directive.

Link 12 - Rock Road between R172 and Sandy Lane

The annual calculated increase in PIA as a result of the development is 0. 12 PIA per year.

It is considered that the magnitude of this effect is negligible, but receptor sensitivity to this effect is always considered as high. When combined, the effect can be classified as negative, likely, long-term, Slight and **Not Significant** in terms of the EIA Directive.

The proposed site access junction, and bus stop arrangement, have been the subject of a Stage 1 / 2 Road Safety Audit. The comments raised by the Auditor have been addressed in the final proposed design, which will be assessed again as part of the RSA process as the design is finalised and the junction constructed.

6.10 Mitigation Measures

6.10.1 Incorporated Design Mitigation

The following mitigation measures have been incorporated into the design:

- An internal site layout that has been designed in accordance with DMURS, which prioritises pedestrian and cycle movement over vehicular movements, creating a safer environment for those on foot or bike.
- The entire site, and external access junction proposals, has been the subject of a Stage 1 / 2 Road Safety Audit, which has assessed safety aspects for all modes of transport. The following changes were made to the design in response to the Audit:
  - Additional signage and surfacing details were added to the drawings to clarify a pedestrian refuge zone at the R617 / Site Access junction.
  - Tactile paving was added to the junction between the site access path and Bóthar Maol.
  - A corner radius was adjusted on an internal street, to allow two cars to pass more easily.

6.10.2 Construction and Demolition Phase Mitigation

Although not considered to be significant in EIAR terms, if not properly managed then construction traffic does have the potential to impact negatively on the local community, businesses, vulnerable travellers and road users.

Traffic impacts during the construction stage will be mitigated through the implementation of a Construction Traffic Management Plan (CTMP), which will be agreed with LCC. A Framework CTMP, which sets out the principles to be followed, forms part of the wider Outline Construction and Environmental Management Plan submitted with this application. The CTMP sets out the principles by which construction traffic will be planned for, managed, and monitored, to ensure that any impacts on local communities, vulnerable users and road users, will be minimised as far as possible.

6.10.3 Operational Phase Mitigation

This operational phase assessment concludes that the proposed development will not significantly affect the local road network.

Notwithstanding this, A Mobility Management Plan has been prepared by SYSTRA and is included in the Transport Assessment (as part of the planning application submission), as a 'best practice' measure, to accompany the planning application.

The aim of the Mobility Management Plan is to minimise the proportion of single occupancy vehicle trips and address the forecast transport impacts of the end-users of the subject site. These mobility measures will also support and enable those residents who may be living 'car-free' providing them with a range of sustainable mobility options and negating the need to own a car. These measures are primarily focussed on encouraging walking, cycling and the use of public transport and can be broadly summarised into the following groups:

- Appointing a Mobility Manager.
- Provision of a Welcome Travel Pack for residents.
- Measures to encourage walking, such as the provision of clear signage and maps throughout the site.
- Measures to encourage cycling, including the provision of bike hire hubs on the site, and the provision of cycling signage and maps, showing cycle times to key destinations.
- Measures to encourage Public Transport use, including liaising with local bus operators regarding bus scheduling, routes and school travel.

The development is designed to complement and support future transport initiatives such as the Blackrock to Dundalk Greenway, the NTA's Cycle Connects Scheme and the NTA's Rural Mobility Plan.

A Mobility Manager will be appointed from within the management company to ensure the implementation and monitoring of the Mobility Management Plan. They will act as a point of contact for residents for all mobility and access related issues.

6.11 Residual Impact Assessment

With the Framework CTMP and Mobility Management Plan in place, the residual impact of the Proposed Development will be **'not significant'**, both in terms of the development itself isolation and cumulatively, during either the construction or operational phases of the development.

6.11.1 Cumulative Residual Effects

Any planning applications listed as granted, or with a decision pending from within the last five years, were assessed for their potential to act in-combination with the Proposed Development to cause significant effects on traffic and transportation receptors.

The developments that have been considered are listed in the Table below, along with an assessment of likely in-combination effects.

Table 6.8 Assessment potential cumulative impacts

Planning Ref	Description	Decision	Comments
ABP 303891 and ABP 306503 24/102 SHD	142 no. apartments and associated site works	Permitted. EOD Permitted.	Under construction No TA found. Located to east of N52 / R132 junction – unlikely to be significant cumulative impact with development traffic.
ABP 303253 23/406 SHD	166 no. residential units, creche, completion of street network and link roads and associated site works	Permitted. EOD Permitted.	Under construction. TA available and flows included within EIAR assessment
25/2 Extension of Duration	EOD of 304782 – an SHD comprising 483 no. units.	Refused 07/03/2025	Previous LRD application. Flows not included in EIAR assessment.
ABP 308135 SHD	257 no. residential units (163 no. houses, 94 no. apartments), childcare facility and associated site works	Granted 23/12/2020	Under construction No TA found. Located immediately to east of R132 – unlikely to be significant cumulative impact with development traffic.
15/285 ABP 245454 20/981	4 blocks of student housing comprising 21 units, a total of 189 rooms, 127 room nursing home, training centre, parking and ancillary site works.	Permitted. EOD Permitted.	Under construction TA available and flows included within EIAR assessment
21/1032 ABP 311776 Application	Construction of 29 residential units comprising 24 no. apartments in two blocks, 5 houses.	Granted 27/04/2023	Below threshold for which TA required – no traffic data available.

23/64, ABP 316990 LRD	Construction of 183 residential units and associated site works	Granted 03.05.2023	TA available and flows included within EIAR assessment
2360177	15 no. dwellings	Granted 06.06.2024	Below threshold for which TA required – no traffic data available.
2360113, ABP 318894	Demolition of dwelling with associated outbuildings for construction of 37 residential units with car parking, vehicular and pedestrian access along with all associated ancillary site works	Refused by LCC. Appealed. Decision Outstanding.	Below threshold for which TA required – no traffic data available.
22583 S34	Resi development comprising c. 234 dwellings	Granted 17.02.2023	Located to west of R132 – unlikely to be significant cumulative impact with development traffic.
22688 S34		Granted 06.07.2023	
2360257 S34		Granted 20.09.2023	
2460331 S34		Granted 05.12.2024	
2460512 S34	Neighbourhood centre including retail, medical practice, pharmacy, café, dental and creche	Decision to Grant 10.03.2025	Below threshold for which TA required – no traffic data available.
2460649 S34	Resi development comprising 91 units	FI Requested 06.12.2024	Below threshold for which TA required – no traffic data available.
2460737 S34	Resi development comprising 80 units	FI Requested 24.01.2025	Below threshold for which TA required – no traffic data available.
2460785 S34	Resi development comprising 85 units	FI Requested 07.02.2025	Below threshold for which TA required – no traffic data available.
221000, ABP 318174 S34	Demolition of derelict structure and construction of 39 dwellings and all associated site works	Granted 19.09.2024	Below threshold for which TA required – no traffic data available.

2460033, ABP 321426 S34	Construction of a discount supermarket with off-licence along with all associated site works	Granted by LCC. Appealed. Decision Outstanding.	Located immediately to east of R132 – unlikely to be significant cumulative impact with development traffic
2460037 S34	Permission for the subdivision of ground floor unit 2 into two separated units	Granted 08.04.2024	Below threshold for which TA required – no traffic data available.
2460114 S34	Permission for A. The construction of a new material storage building (Area=2020m2, Height = 13.57m). B. Extension of yard to the West of the existing building. C. Removal of existing carpark area and replacement of same with construction of new carpark area to the North East and extension of carpark to the South East of Site. D. Alterations to site landscaping. E. All associated site development works	Granted 19.04.2024	Below threshold for which TA required – no traffic data available. No significant traffic generation expected.
2460675 Decision pending	Extension to Felda Health and Spa	Decision Due Date 15.04.2025	Below threshold for which TA required – no traffic data available. No significant traffic generation expected
PT8LH154 Part 8	Dundalk Active Travel Project along the Dublin Road from Xerox Junction (R132, R215 intersection) heading northwards to Riverside Walk for a length of c.2km	Proceed 10.09.2024	Scheme of benefit to pedestrians and cyclists. Not assessed within the EIAR.
PT8LH116	Inner Relief Road Active Travel Scheme to install high-quality segregated pedestrian and cycling infrastructure to improve safety and promote Active Travel along the R132 Inner Relief Road Dundalk from Xerox Junction (R132, R215 intersection) heading northwards to The Tain Bridge for a length of c.4km	Proceed 10.09.2024	Scheme of benefit to pedestrians and cyclists. Not directly assessed within the EIAR.
	Dundalk Active Travel Project – Dublin Road (R132) Dundalk, Xerox Junction to Greengates	Consultation Stage.	Scheme of benefit to pedestrians and cyclists. Not directly assessed within the EIAR.

Where traffic data is available for these developments, they have been included in the 'Do Minimum' scenario tested in the junction capacity modelling undertaken as part of the TA. The results of this assessment are presented in 'Section 7 – Traffic Impact' of the TA and demonstrate that the assessed junctions are predicted to operate within capacity when traffic from the Proposed Development, and cumulative developments, is considered.

In conclusion, in-combination effects are assessed as **Not Significant** in accordance with the EIA Directive.

6.12 Risk of Major Accidents or Disasters

The Risk of Major Accidents or Disasters is not considered relevant in respect of Traffic and Transportation.

6.13 Worst Case Scenario

6.13.1 Construction Phase

In the construction phase the following are credible worst-case scenarios involving transportation that may occur:

- A major accident on the public road network because of materials being brought to site;
- The release of hazardous materials onto the surface carriageway on the local roads network with the potential for widespread chemical contamination, risk to human health and risk to the natural environment;

Best practice construction measures, including Traffic Management measures outlined in the Framework Construction Traffic Management Plan are intended to minimise the risk of such occurrences and will be strictly adhered to.

6.13.2 Operational Phase

In the evaluation of traffic impact, the future year junction capacity assessments include traffic flows to be generated by other nearby planned developments, as well as applying robust TII growth factors to baseline traffic (despite Government policies targeting traffic reductions). Therefore, the predicted traffic flows presented in this chapter are robust.

In the operational phase the following are credible worst case scenarios involving transportation that may occur:

- Internal within the scheme a breakdown of a standard vehicle, or Refuse/Delivery truck will restrict movement in/out of the scheme;
- Breakage and/or outage of electrical distribution services will result in controlled junctions becoming uncontrolled and hazardous to pedestrian/cycle movements.

These scenarios would apply to any development, and are as likely at an existing development as to the proposed scheme.

6.14 Interactions

This is addressed in Chapter 16 of this EIAR.

6.15 Monitoring

No specific monitoring measures over and above expected normal construction and operational practices for such a development are proposed for the construction phase.

No monitoring is proposed for the operational phase.

6.16 Summary of Mitigation and Monitoring

The following Table summarises the Construction and Demolition Phase mitigation and monitoring measures.

Table 6-9 Summary of Construction and Demolition Phase Mitigation and Monitoring

Likely Significant Effect	Mitigation	Monitoring
Construction phase: No significant effects identified	Implement the Construction Environmental Management Plan (CEMP)	On-going
	Implement the Construction Traffic Management Plan (CTMP)	On-going

6.17 Conclusion

The assessment has found that there will be no significant negative effects in terms of Traffic and Transportation, either from the development when considered alone, or in combination with other developments, during either the construction or operational phases of the development.

6.18 References and Sources

6.18.1 Relevant Legislation & Guidance

This chapter has been prepared having regard to, inter alia, the following guidelines:

- Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EPA, 2022);
- Transport Infrastructure Ireland's (TII's) Traffic & Transport Assessment Guidelines (2014); and

- Institute of Environmental Management and Assessment (IEMA) publication - "Environmental Assessment of Traffic and Movement", 2023 ("the IEMA Guidelines").
- TII 'Project Appraisal Guidelines for National Roads Unit 5. 3', specifically Table 6.2 'Link Based Growth Rates'.

There are also a number of relevant national and regional policies which have guided the assessment These include the following documents:

- Project Ireland 2040 – National Planning Framework First Revision (2025)
- Regional Spatial and Economic Strategy for the Southern Region, Project Ireland 2040
- Consolidated Louth County Development Plan (2021 – 2027)
- Dundalk Local Area Plan 2025 – 2031 and associated Local Transport Plan
- National Sustainable Mobility Policy 2022
- Design Manual for Urban Roads and Streets (DMURS, updated 2019); and
- Cycle Design Manual 2023.

6.18.2 Site Surveys/Investigations

The EIAR assessment has been informed by a site visit undertaken by Glen Moon in December 2024. The following site surveys have been undertaken:

- Traffic surveys undertaken on 25th February 2025. These comprised JTC (JTC) surveys at eight junctions.
- An Automatic Traffic Counter that was in place on the R172, at the location of the proposed site access junction. The ATC was in place for a week in March 2023, and recorded traffic volumes and speeds. The same location was re-surveyed on February 2025, to confirm that results were still representative.
- A Bus Capacity Survey that was undertaken in November 2023.

Haggardstown LRD

Dundalk, Co. Louth

Main Statement

Volume II

CHAPTER 7

Material Assets: Built Services

May 2025

McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

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7 Material Assets: Built Services

7.1 Introduction

This chapter of the EIAR was prepared to assess the potential significant effects of the proposed development on the surface water drainage, wastewater drainage, water supply and utilities (electricity, telecommunications and gas) in the existing environment. Where appropriate, mitigation measures are proposed along with monitoring plans to ensure their effective implementation.

It should be read in conjunction with the Lands & Soils, Water & Hydrology and Biodiversity Chapters in this EIAR and also the *Infrastructure Design Report*, the infrastructure drawings and the Outline Construction Environmental Management Plan prepared by Donnachadh O'Brien & Associates Consulting Engineers and submitted with the planning application.

7.2 Expertise & Qualifications

This chapter of the EIAR has been prepared by a team consisting of Donnachadh O'Brien, Paul Doyle and Alan Lambe of Donnachadh O'Brien & Associates Consulting Engineers.

Donnachadh is a Chartered Engineer and a Fellow of the Association of Consulting Engineers of Ireland with over 28 years of experience as a Consulting Civil & Structural Engineer. Paul and Alan are also Chartered Engineers and Registered Professional Consulting Engineers (RConsEI) with the Association of Consulting Engineers of Ireland, and both have over 15 years of experience as Consulting Civil & Structural Engineers. Donnachadh, Paul and Alan have extensive experience in the design and delivery of urban development schemes and have advised clients including government bodies, local authorities and private developers.

7.3 Proposed Development

The proposed development is described in Chapter 2. The development generally comprises of 502 no. residential units, comprising 1, 2, 3 and 4 bed units in a mix of maisonettes, terraced and semi-detached units, with 1 no. detached bungalow unit; Creche building and all associated site and development works including landscaping and amenity areas, infrastructure and services, and new entrance from Blackrock Road, with additional pedestrian/cycle access from Bóthar Maol.

7.3.1 Aspects Relevant to this Chapter

7.3.1.1 Existing Surface Water Drainage

No formal existing surface water infrastructure is located on and adjacent to the subject site of relevance to the proposed development except for a small open water course flowing south to north along the eastern site boundary as illustrated in Figure 7.1. Surface Water run-off currently flows over-land in an easterly direction towards the small open water course and into the Dundalk Bay or soaks into the existing ground.

7.3.1.2 Proposed Surface Water Drainage

Surface Water runoff from the proposed development will be managed in accordance with the requirements of the Greater Dublin Strategic Drainage Study (GDSDS), CIRIA SuDS and the requirements of the Louth County Council Water Services Department (LCC WSD). A 20% climate change factor will be included for the design of the surface water network.

7.3.1.3 Existing Wastewater Drainage

There is no existing wastewater drainage infrastructure on or in close proximity to the site of the proposed development. The closest gravity wastewater network, as indicated by the Uisce Eireann (UE) GIS mapping, which is applicable for a connection from the proposed development, is located along Finnabair Crescent, approximately 0.8km to the north-west of the site. The Applicant commissioned a Ground Penetrating Radar (GPR) and Topographical Survey of the area which have confirmed the location and invert level of an existing 600mm dia. Wastewater sewer as +3.00mOD.

7.3.1.4 Proposed Wastewater Drainage

The proposed wastewater network will collect effluent from the proposed development via a main Wastewater drainage network which is located within the road network around the proposed development where it will finally discharge by gravity to a new 189m^3 Type 3 Wastewater Pump Station (WwPS) to the east of the proposed development which will be provided with a 15m buffer to the nearest property boundary in accordance with Section 5.5 of the IW Wastewater Code of Practice IW-CDS-5030-03. A new 110mm internal diameter (I.D.) rising main will be installed along the public roads with scour and air valves as required and shall discharge to a new stand-off manhole prior to connecting to the existing gravity network along Finnabair Crescent which discharges to the Coe's Road Wastewater Pump Station in accordance with the requirements from the IW CoF. The estimated peak Wastewater loading generated by the proposed development's Dry Weather Flow is estimated at 2.45 l/s while the Design Wastewater Flow of 3DWF is **7.36 l/s** based on a reduced peaking factor of 3.0 in accordance with Section 2.2.5 of the IW Wastewater Code of Practice IW-CDS-5030-03. A Confirmation of Feasibility & Statement of Design Acceptance has been received from Uisce Éireann and are appended to the Infrastructure Design Report prepared by DOBA.

7.3.1.5 Water Supply

A new 200mm dia. looped watermain with 150mm and 100mm dia. spurs as required shall be installed on site along with a new bulk water meter. The 200mm main will connect to the upgraded 150mm dia. Water Supply on the R172 Blackrock Road to the east of the development in accordance with the requirements of the IW CoF. The watermain layout and connections, valves, hydrants, meters etc. shall be designed in accordance with Uisce Eireann's Code of Practice for Water Infrastructure IW-CDS-5020-03 Standard Details and the Department of the Environment's Building Regulations "Technical Guidance Document Part B Fire Safety". The new site watermain network will adequately serve the firefighting requirements with Fire Hydrants provided on the loop main in accordance with Part B of the Building Regulations. The estimated peak hour water demand generated by the proposed development is 15.32 l/s. A Confirmation of Feasibility & Statement of Design Acceptance has been received from Uisce Éireann and are appended to the Infrastructure Design Report prepared by DOBA.

7.3.1.6 Electrical Supply

A new underground power cable shall connect into the existing network and route through the proposed development to serve the new ESB kiosks. Existing 10kV / 20kV over-head (O/H) powerlines traverse the site and shall be diverted and undergrounded as part of the proposed development.

7.3.1.7 Gas Supply

It is not proposed to provide gas as a utility in the proposed development. (Gas is located proximate to the site. Having regard to the above, this EIAR will only consider gas in terms of potential significant effects on gas supply during the construction phase.)

7.3.1.8 Telecommunications

The supply of telecommunications infrastructure to the proposed development site will be provided by way of a connection to existing Eircom telecommunication network.

7.4 Methodology

7.4.1 Relevant Legislation & Guidance

This chapter has been prepared having regard to the following guidelines:

- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (Department of Housing, Planning & Local Government, 2018)
- Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report (European Commission, 2017)
- Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EPA, 2022)

7.4.2 Desk Study

A desktop study was carried out to collate and review available information, datasets and documentation sources pertaining to the Site. The desk study, completed in April 2025, relied on the following sources:

- Louth County Council Surface Water Drainage Plans
- Uisce Éireann (UÉ) Water and Wastewater Utility Plans
- Submission of a Pre-Connection Enquiry to Uisce Éireann
- Gas Networks Ireland (GNI) Utility Plans
- ESB Utility Plans
- Eir Utility Plans
- Virgin Media Utility Plans

7.4.3 Site Surveys/Investigations

The following surveys and site investigations were undertaken and informed the assessment in this Chapter.

- Metroscan Topographical Survey
- Metroscan Ground Penetrating Radar (GPR) Survey
- Geotechnical Investigations (by Geotechnical Environmental Services Ltd (July 2018) and IGSL Ltd(May 2023))
    - These documents are appended to Chapter 9 of the EIAR

7.4.4 Consultation

The applicant has liaised with the Uisce Éireann via an EIAR scoping letter and has received a response including aspects of water services which have been considered in the EIAR (Appendix 7-1). In addition, the sub sections below describe the additional consultations carried out under the following headings:

- Surface Water Drainage
- Wastewater Drainage
- Water Supply
- Electrical Supply
- Gas Supply
- Telecommunications

7.4.4.1 Surface Water Drainage

Extensive consultation has taken place between the Applicant and the Louth County Council Water Services Department (LCC WSD) during the preparation of the planning documentation. The Applicant has formally engaged with LCC WSD on the following dates to discuss the Proposed Surface Water & SuDS strategy:

- S247 meeting with LCC WSD dated 27.11.2024
- LRD Opinion meeting with LCC WSD dated 05.03.2025
- LCC WSD LRD Opinion Meeting comments received dated 31.03.2025

7.4.4.2 Wastewater Drainage

The Applicant has liaised with Uisce Eireann (UE) in relation to the proposed development and submitted a pre-connection enquiry (PCE) to which UE responded with a Confirmation of Feasibility letter. In summary, the CoF letter notes that a wastewater connection for the full development can be facilitated, in advance of upgrade works to the Coe's Road WwPS, via an interim temporary solution whereby flows from the development in excess of 61m3 are stored on the development site during the day (7am to 7pm) and are discharged to the public network during the night (7pm to 7am). An extract from the CoF letter is included below:

"Upgrade works are required to increase the capacity of the existing wastewater network. Uisce Eireann currently has a project on our current investment plan which will provide the necessary upgrade and capacity. This upgrade project is scheduled to be completed by Q1 2030 (this may be subject to change) and the proposed connection could be completed as soon as possible after these works. Customer to engage at Connection Application stage.

Where a connection is proposed in advance of the Coe's Rd project the following interim solution is required to confirm capacity as per below.

Flows from the pumping station constructed under Phase 1 of the development (serving 200 units) shall not be increased during daytime hours (ie 7am to 7pm). This would amount to approximately 61m3 total volume pumped in these hours. The remaining balance of flows (serving 303 units) would be stored during the day then discharged in the night (7pm to 7am). Dosing would be required to avoid septicity. This arrangement would be temporary until the Coe's Road upgrade project is completed. Once this is completed the pumping station can operate as normal throughout the day".

A Connection Agreement is in place for 200 units under a previous permission on the site (ABP Ref. 304782).

Additionally, Uisce Éireann (UÉ) have provided a Statement of Design Acceptance (SoDA) in respect to the proposed Wastewater layout and design.

7.4.4.3 Water Supply

Consultation has taken place with Uisce Éireann (UÉ) through a Pre-Connection Enquiry. UÉ issued a Confirmation of Feasibility letter which confirmed that connection from the proposed development to the existing Water Supply network on the R172 Blackrock Road is feasible without upgrade. Additionally, UÉ have provided a Statement of Design Acceptance in respect to the proposed Water Supply layout and design.

7.4.4.4 Electrical Supply

The Applicant has engaged with the ESB who have reviewed and commented on the proposed ESB design and capacity for the proposed development. This is applicable to the network design, connection with the existing ESB network external to the site and capacity availability. No official confirmation can be provided from the ESB until official applications are submitted with an approved planning reference number.

7.4.4.5 Telecommunications

The Applicant has engaged with the telecoms services providers and reviewed existing as-installed network layouts. With regard to the existing as-installed layouts and infrastructure, the telecoms services are sufficient to cater for the proposed development. Official confirmation and connection to the area network systems will be provided and supplied by the service providers upon submittal of official applications, post planning approval.

7.5 Difficulties Encountered

No limitations or difficulties were encountered in compiling the required information in relation to the built services.

7.6 Baseline Environment

The sub-sections below describe the baseline environment with respect to Material Assets (Built Services) under the following headings:

7.6.1.1 Surface Water Drainage

No formal existing surface water infrastructure is located on and adjacent to the subject site of relevance to the proposed development except for a small open water course flowing south to north along the eastern site boundary as illustrated in Figure 7.1. Surface Water run-off currently flows over-land in an easterly direction towards the small open water course and into the Dundalk Bay or soaks into the existing ground.

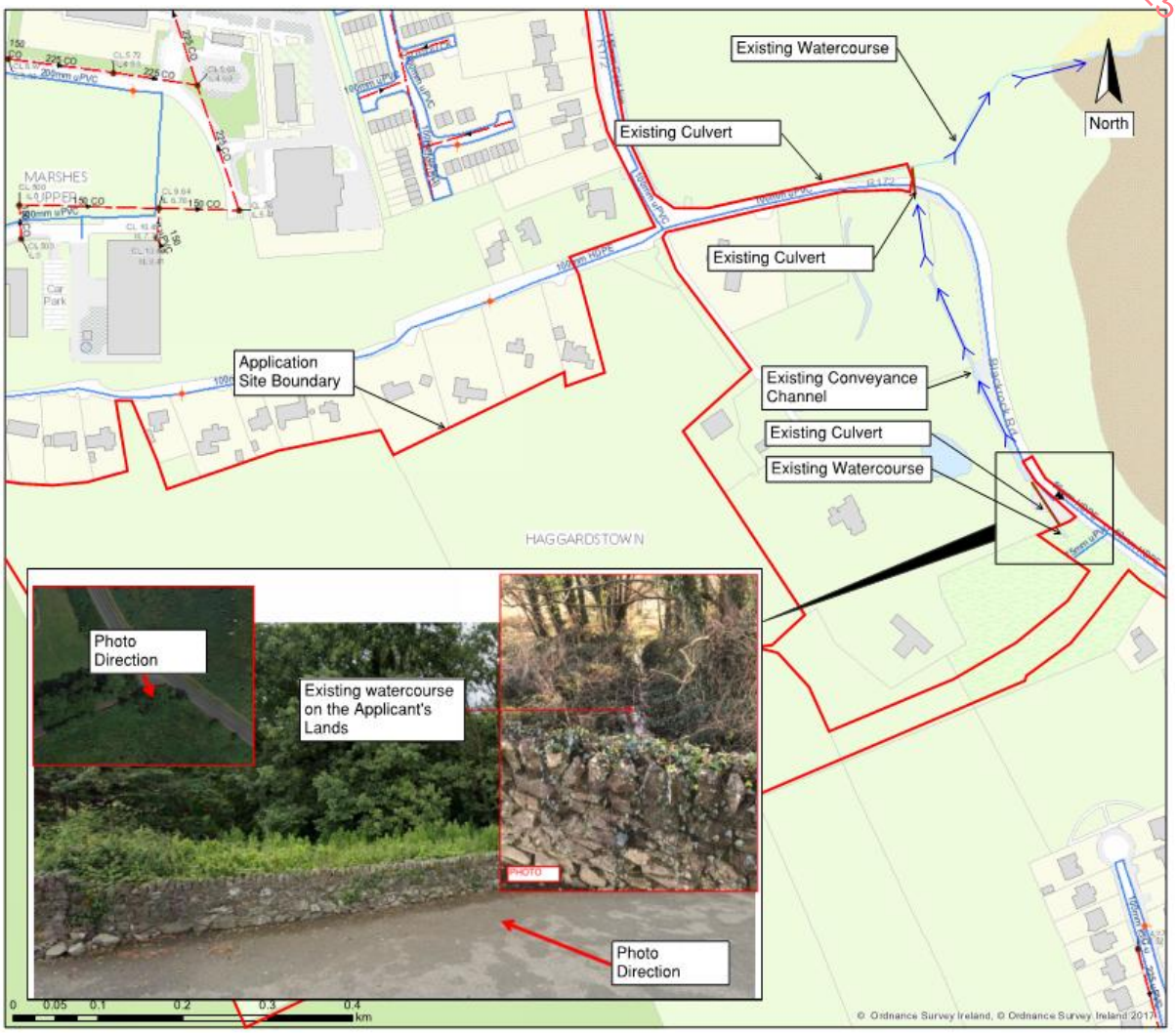

Figure 7-1 Existing small open water course along the eastern site boundary (Source: Uisce Eireann)

7.6.1.2 Wastewater Drainage

There is no existing wastewater infrastructure of relevance to the subject site in close proximity to any boundary of the proposed development. The nearest relevant wastewater network is an existing 600mm dia. wastewater sewer located 0.8km to the north-west of the proposed development on Tandy's Lane, off Finnabair Crescent. Figure 7.2 below illustrates the location of the existing wastewater infrastructure in close proximity to the subject site.

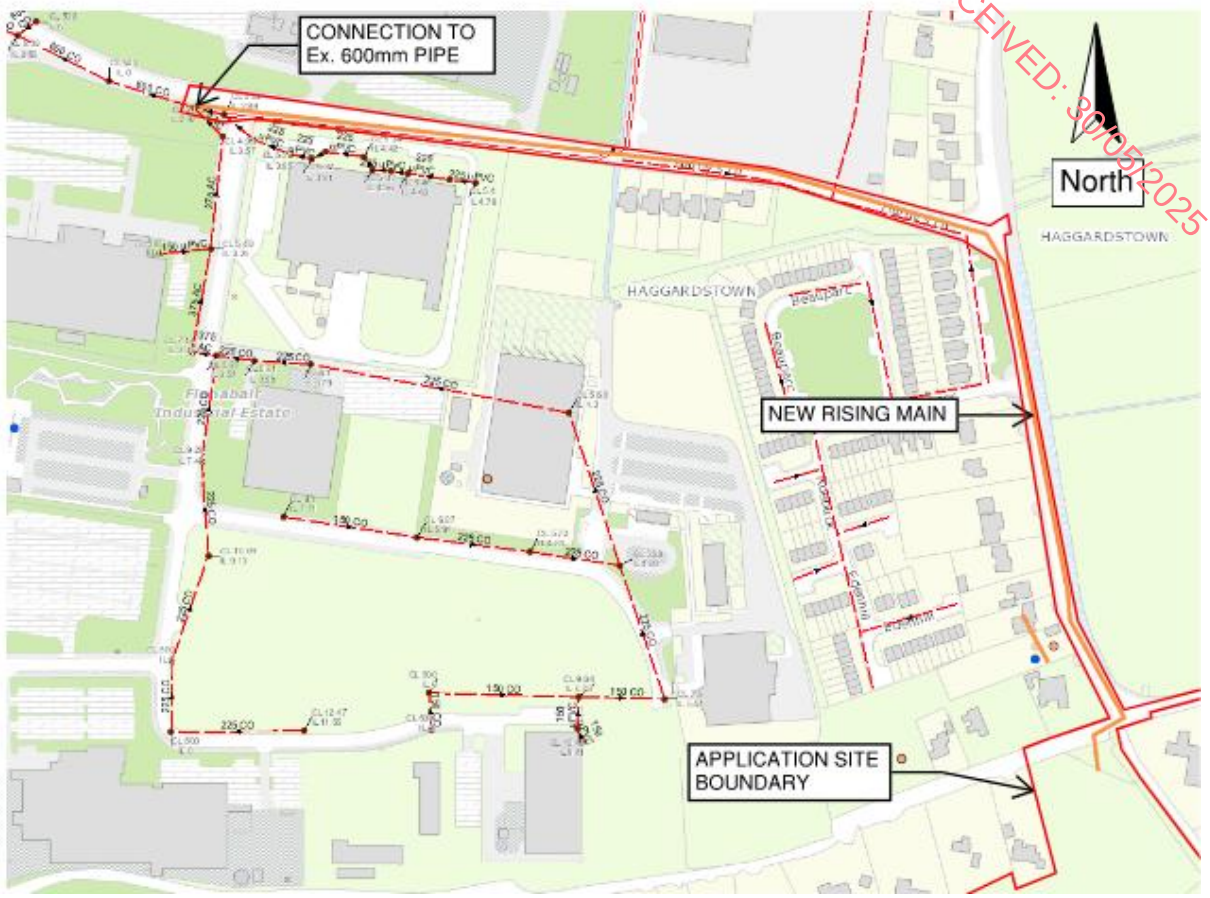

Figure 7-2 Existing wastewater infrastructure in close proximity to the site (Source: Uisce Éireann)

7.6.1.3 Water Supply

There are a number of existing 100mm dia. watermains in close proximity to the site of the proposed development. Uisce Éireann completed an upgrade of the existing watermain along the R172 to the east of the lands in 2024 to support future growth and development in the area. The existing Water Supply network is illustrated on the existing Uisce Éireann Web Map in Figure 7.3.

7.6.1.4 Electrical Supply

The ESB maintains underground and overhead powerlines within and around the existing subject site as indicated in Figure 7.4. The ESB infrastructure of relevance to the proposed development includes the following:

- 10/20kV overhead powerlines in multiple locations throughout the site.
- A 400/230V overhead powerline adjacent to the proposed site entrance along the eastern site boundary.
- A MV/LV (10kV/20kV/440V/230V) underground cable in the northern section of the site adjacent to Bóthar Maol.

Figure 7-3 Existing water supply infrastructure in close proximity to the site (Source: Uisce Éireann)

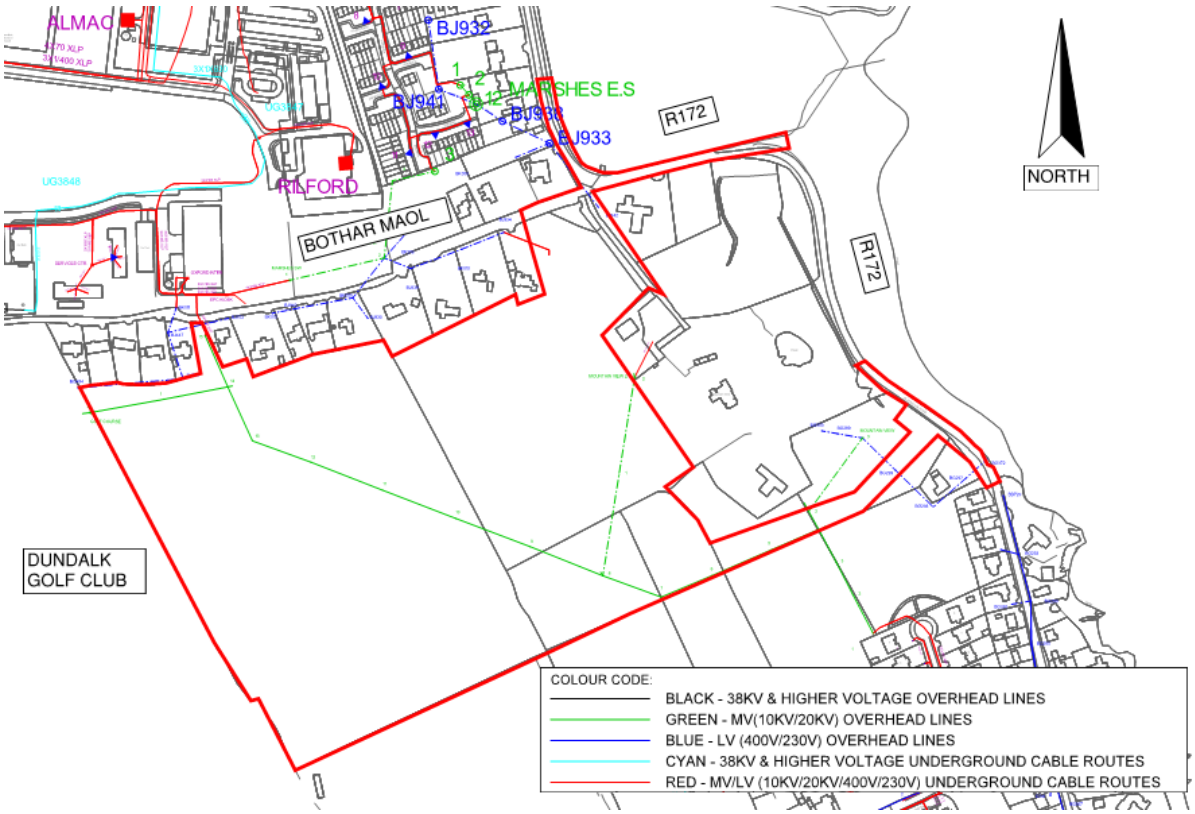

Figure 7-4 Existing ESB infrastructure of relevance to the subject site (Source: ESB)

7.6.1.5 Gas Supply

There are existing underground medium pressure distribution gas mains located proximate to the subject site as follows and as indicated in Figure 7.5 below:

- An existing 125mm diameter PE-80 4 bar gas main is located east of the proposed development along the R172.
- An existing 63mm diameter PE-80 4 bar gas main is located to the north of the proposed development along Bóthar Maol.

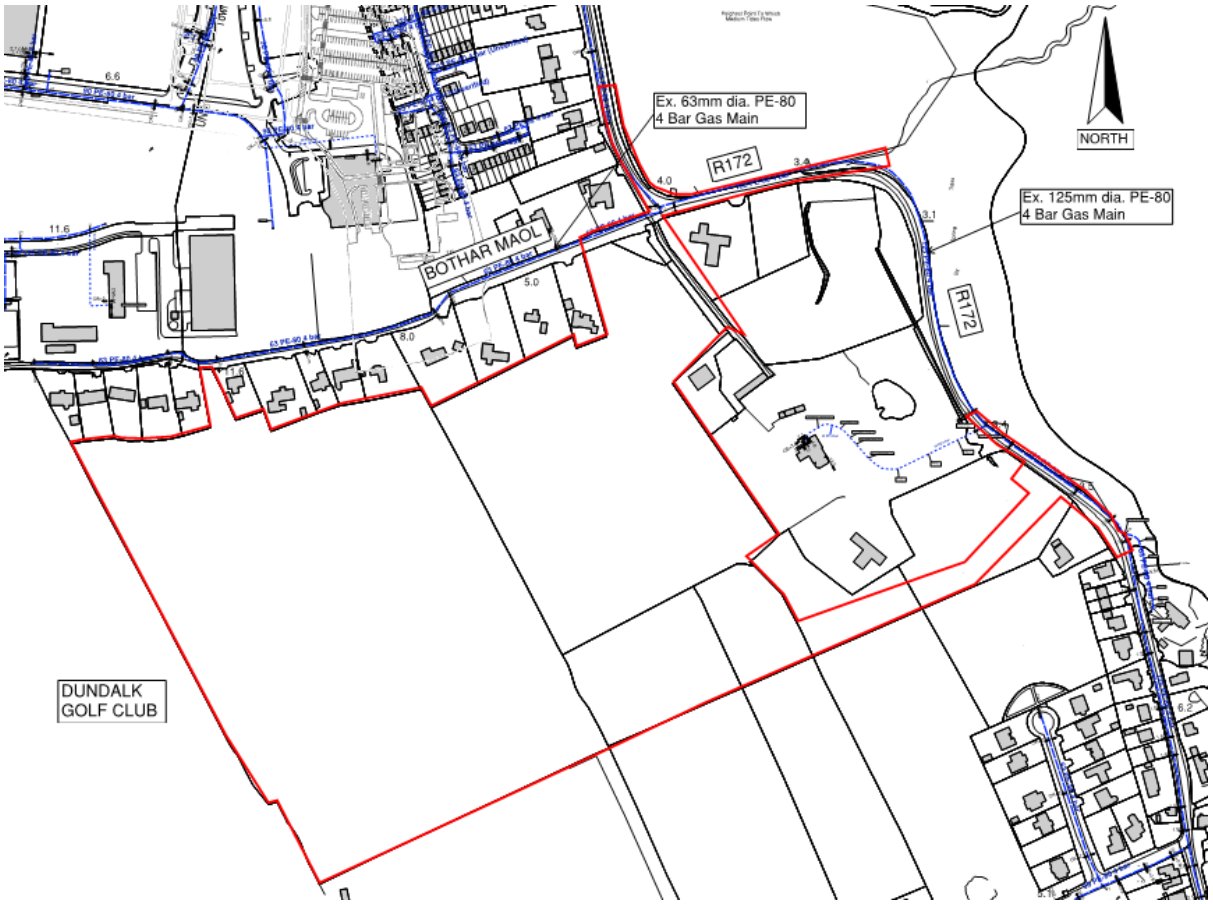

Figure 7-5 Existing Gas infrastructure adjacent to the subject site (Source: GNI)

7.6.1.6 Telecommunications

There are existing underground Eircom telecommunications infrastructure relevant to the proposed development east and north respectively outside of the subject site, as illustrated in Figure 7.6 below:

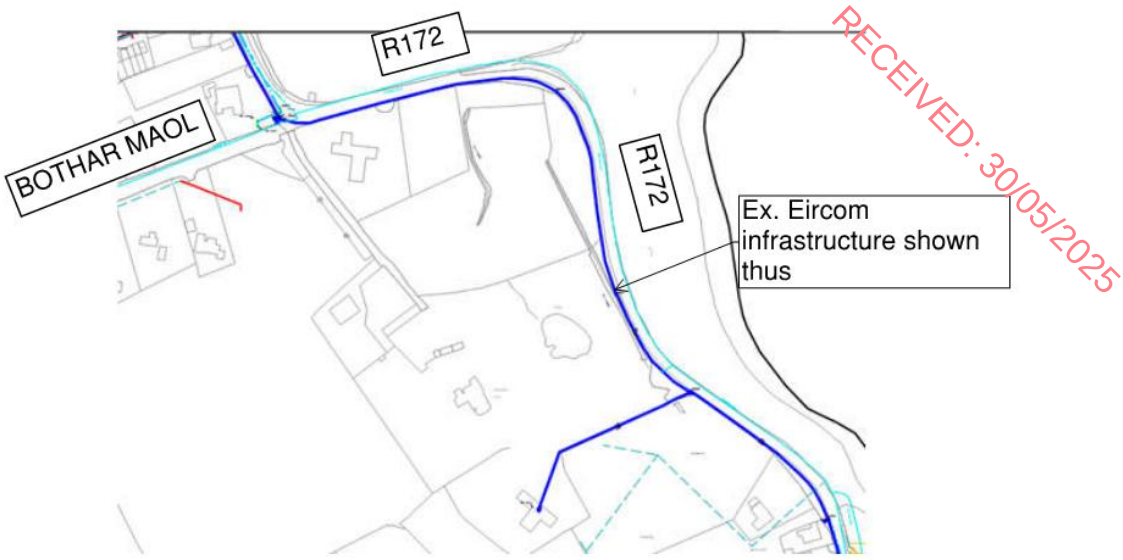

Figure 7-6 Existing Eircom infrastructure adjacent to the subject site (Source: Eircom)

7.7 The 'Do Nothing' Scenario

If the proposed development is not undertaken, it is expected that there would be no change on the subject site on Surface Water drainage, wastewater drainage, Water Supply and other utilities arising from the subject site.

7.7.1 Alternative Development Scenario

Given the zoning and planning context, it is reasonable to expect that a similar residential development could be proposed for the site and in such case similar effects as described above would be expected.

7.7.2 Surface Water

In the absence of the proposed development, Surface Water runoff from the subject site would continue to flow overland towards the Irish Sea in an easterly direction. In the absence of the proposed SuDS measures being implemented, Surface Water run-off would continue to flow overland to the east towards the Irish Sea or soak into the existing ground, which is a **neutral, imperceptible i.e. not-significant, long-term** effect.

7.7.3 Wastewater

In the absence of the proposed development, there would be no increase in wastewater flows in the existing wastewater network, which is a **neutral, imperceptible i.e. not-significant, long-term** effect.

7.7.4 Water Supply

In the absence of the proposed development, there would be no increase in water demand to the existing Water Supply network, which is a **neutral, imperceptible i.e. not-significant, long-term** effect.

7.7.5 Electrical Supply

In the absence of this proposed development, there would be no change to the existing electricity supply network, which is a **neutral, imperceptible i.e. not-significant, long-term** effect.

7.7.6 Gas Supply

In the absence of this proposed development, there would be no change to the existing gas supply network, which is a **neutral, imperceptible not-significant, long-term** effect.

7.7.7 Telecommunications

In the absence of this proposed development, there would be no change to the existing telecommunications network, which is a **neutral, imperceptible not-significant, long-term** effect.

7.8 Potential Significant Effects

The following sub-sections outline the likely significant effects of the proposed development in the absence of mitigation.

7.8.1 Demolition and Construction Phase

It is noted that a traditional demolition phase is not proposed as no buildings are located on the site. However, minor demolition works are proposed to the boundary wall adjacent to the R172 to facilitate a site access and associated sightlines.

7.8.1.1 Surface Water

During the demolition and construction phase, Surface Water shall be discharged to onsite settlement ponds prior to discharging to the open watercourses to the east of the site and onwards to the Irish Sea subject to agreement with Louth Co. Co. The following are the likely significant effects of the proposed scheme in the absence of mitigation measures during the construction stage:

- Mobilisation of sediments and harmful substances during the construction phase, due to exposed soil and earth movement/excavation, which may be flushed into the watercourse during rainfall events.
- Accidental spills of harmful substances such as petrol/diesel or oil during the delivery and storage of harmful substances or by leakages from construction machinery. Construction materials such as concrete and cement are alkaline and corrosive and can cause pollution in watercourses.
- Potential for building materials or silts to be washed into the new Surface Water system, causing blockages and pollution. Waterborne silt can arise from dewatering excavations, exposed ground, stockpiles and site roads. Heavy siltation or grit in the Surface Water runoff would lead to issues for the receiving watercourse.
- Temporary dewatering measures will be necessary to manage water within excavations during heavy rainfall. Water collected in temporary excavations shall be pumped to settlement ponds on site and treated before discharge to the existing watercourses subject to agreement with Louth Co. Co.

In the absence of mitigation measures, these potential impacts are considered to be **adverse, moderate to significant** and **temporary**.

7.8.1.2 Wastewater

The Contractor's welfare facilities for demolition and construction personnel will be located on site and temporary wastewater effluent from these facilities shall be discharged to the sewerage system at a location and at a flow rate subject to the conditions of a discharge licence from Uisce Éireann. The following are the likely significant effects of the proposed scheme in the absence of mitigation measures during the construction stage:

- Temporary discharge from excavations could potentially lead to siltation, surcharge and flooding within the public wastewater system.
- Effluent from the Contractor's temporary welfare facilities could potentially lead to flooding within the sewerage system.

In the absence of mitigation measures, these potential impacts are considered to be **adverse, significant** and **temporary**.

7.8.1.3 Water Supply

During the Construction Phase, the Contractor shall install temporary welfare facilities on site for construction personnel. The water demands during the Construction Phase arising from the Contractor's welfare facilities on the existing Water Supply network are considered to be a **neutral** and **imperceptible i.e. not significant** effect with a **short-term** duration.

7.8.1.4 Electrical Supply

Electricity will be required for the construction activities for temporary lighting, equipment use etc. It is anticipated that a temporary connection to existing spurs at the site boundary will facilitate electricity supply to the site during construction, subject to the appropriate agreements. The power demands during the construction phase on the existing electricity network are considered to be a **neutral, imperceptible i.e. not significant** and **short-term** effect.

Where the excavation strategy or temporary works require any temporary diversion of local services or utilities on the site perimeter, this would be undertaken with prior agreement of the relevant service provider. A **negative, not significant short-term** effect is identified where utility diversions are required.

The existing 20kV and 38kV overhead powerlines which traverses the subject site are to be undergrounded and diverted. These works will require a temporary power outage of approximately 2 days, which shall be confirmed by the ESB, on the network, in order to facilitate the connection and is considered a **negative, significant** and **short-term** effect.

7.8.1.5 Gas Supply

There is no gas infrastructure on the subject site and it is not proposed to provide gas as a utility within the proposed development. Where the excavation strategy or temporary works require any temporary diversion of local gas services on the site perimeter, this would be undertaken with prior

agreement of the relevant service provider. These works are considered as **neutral** with an **imperceptible i.e. not-significant** effect and with a **short-term** duration.

7.8.1.6 Telecommunications

There is no existing telecommunications infrastructure within the subject site of the proposed development and all existing telecommunication cables in close proximity to the subject site are located in underground ducts within the adjacent roads. As such, there will be no likely significant effects on telecommunications infrastructure during the construction phase of the proposed development. Where the excavation strategy or temporary works require any temporary diversion of local telecommunication services or utilities on the site perimeter, this would be undertaken with prior agreement of the relevant service provider. These works are considered as **neutral** with an **imperceptible i.e. not significant** effect and with a **short-term** duration.

7.8.2 Operational Phase

7.8.2.1 Surface Water

Surface Water run-off from the existing undeveloped greenfield site flows over-land in an easterly direction towards the Irish Sea or soaks into the existing ground. The estimated greenfield run-off rates for the subject site are 64.50 l/s and 5 l/s.

The proposed development shall implement SuDS measures to achieve a 2-stage treatment process which will intercept Surface Water run-off and treat the water by a minimum of two stages of filtration and treatment through Nature Based SuDS (NBS) measures and conveying this water to storage facilities.

The proposed discharges from the development to the existing open water courses are limited to 64.50 l/s and 5 l/s, which are the permitted equivalent greenfield run-off rates. The impacts on Surface Water discharge from the site are considered to be **neutral, imperceptible i.e. not-significant** and **permanent**.

7.8.2.2 Wastewater

Wastewater from the proposed development will drain northwards to the existing Coe's Road Pumping Station prior to being pumped to the Dundalk Wastewater Treatment Plant (WwTP). The Applicant has liaised with Uisce Eireann (UE) in relation to the proposed development and submitted a pre-connection enquiry (PCE) to which UE responded with a Confirmation of Feasibility letter. In summary, the CoF letter notes that a wastewater connection for the full development can be facilitated, in advance of upgrade works to the Coe's Road WwPS, via an interim temporary solution whereby flows from the development in excess of 61m3 are stored on the development site during the day (7am to 7pm) and are discharged to the public network during the night (7pm to 7am). An extract from the CoF letter is included below:

"Upgrade works are required to increase the capacity of the existing wastewater network. Uisce Eireann currently has a project on our current investment plan which will provide the necessary upgrade and capacity. This upgrade project is scheduled to be completed by Q1 2030 (this may be subject to change) and the proposed connection could be completed as soon as possible after these works. Customer to engage at Connection Application stage.

Where a connection is proposed in advance of the Coe's Rd project the following interim solution is required to confirm capacity as per below.

Flows from the pumping station constructed under Phase 1 of the development (serving 200 units) shall not be increased during daytime hours (ie 7am to 7pm). This would amount to approximately 61m3 total volume pumped in these hours. The remaining balance of flows (serving 303 units) would be stored during the day then discharged in the night (7pm to 7am). Dosing would be required to avoid septicity. This arrangement would be temporary until the Coe's Road upgrade project is completed. Once this is completed the pumping station can operate as normal throughout the day."

Additionally, UÉ have provided a Statement of Design Acceptance in respect to the proposed Wastewater layout and design. The impacts on the existing Wastewater network are considered to be **neutral, imperceptible i.e. not significant** and **permanent**.

7.8.2.3 Water Supply

Uisce Éireann have advised, through the Connection and Developer Services (CDS) confirmation of feasibility letter, which confirmed that connection from the proposed development to the existing Water Supply network can be facilitated through the connection of the proposed development's water infrastructure to an upgraded 150mm dia. watermain on the R172 Blackrock. Additionally, UÉ have provided a Statement of Design Acceptance in respect to the proposed Water Supply layout and design. As such, the impacts on the existing Water Supply network are considered to be **neutral, not-significant** and **permanent**.

7.8.2.4 Electrical Supply

The proposed development will increase the demand on the electricity supply system. However, it is expected that infrastructural requirements for future development will be accommodated by ESB Networks. Therefore, the impact of the proposed development on the electricity supply network is expected to be **neutral, not significant** and **permanent**.

7.8.2.5 Gas Supply

There is no gas infrastructure on site, and it is not proposed to provide gas as a utility within the proposed development. Therefore, it is considered that the impacts on the existing gas network are **neutral, imperceptible i.e. not significant** and **permanent**.

7.8.2.6 Telecommunications

The proposed development will increase the demand on the telecommunications systems which may potentially lead to a reduction in the level of service to existing customers. It is expected that infrastructural requirements for future development will be accommodated by utility service providers. In the absence of mitigation measures, these potential impacts are considered to be **adverse, not significant** and **permanent**.

7.8.3 Cumulative Effects

There are a number of granted planning permissions for activities / plans / projects which may be under construction at the same time as the proposed development. All elements of the project have

been cumulatively assessed together for their overall impact and the project has then been assessed in combination with the other existing, consented or planned projects as listed below:

- 24/102 ABP 303891 and ABP 306503 – 142 no. apartments and associated site works.
- 23/406 ABP 303253 – 166 no. residential units, creche, completion of street network and link roads and associated site works.
- 25/2 – EOD of 304782 – an SHD comprising 483 no. units.
- ABP 308135 – 257 no. residential units (163 no. houses, 94 no. apartments), childcare facility and associated site works
- 15/285 ABP 245454 20/891 – 4 blocks of student housing comprising 21 units, a total of 189 rooms, 127 room nursing home, training centre, parking and ancillary site works.
- 21/1032 ABP 311776 – Construction of 29 residential units comprising 24 no. apartments in two blocks, 5 houses.
- 23/64 ABP 316990 – Construction of 183 residential units and associated site works.
- 2360177 – 15 no. dwellings.
- 2360113 ABP 2360113 – Demolition of dwelling with associated outbuildings for construction of 37 residential units with car parking, vehicular and pedestrian access along with all associated ancillary site works.
- 22583/22688/2360257/2460331 – Resi development comprising c. 234 dwellings.
- 2460512 – Neighbourhood centre including retail, medical practice, pharmacy, café, dental and creche.
- 2460649 – Resi development comprising 91 units.
- 2460737 – Resi development comprising 80 units.
- 2460785 – Resi development comprising 85 units.
- 221000 ABP 321426 – Demolition of derelict structure and construction of 39 dwellings and all associated site works.
- 2460033 ABP 321426 – Construction of a discount supermarket with off-licence along with all associated site works.
- 2460037 – Permission for the subdivision of ground floor unit 2 into two separated units.
- 2460114 – Permission for A. The construction of a new material storage building (Area=2020m2, Height = 13.57m). B. Extension of yard to the West of the existing building. C. Removal of existing carpark area and replacement of same with construction of new carpark area to the North East and extension of carpark to the South East of Site. D. Alterations to site landscaping. E. All associated site development works.
- 2460675 – Extension to Felda Health and Spa.
- PT8LH154 – Dundalk Active Travel Project along the Dublin Road from Xerox Junction (R132, R215 intersection) heading northwards to Riverside Walk for a length of c.2km.
- PT8LH116 – Inner Relief Road Active Travel Scheme to install high-quality segregated pedestrian and cycling infrastructure to improve safety and promote Active Travel along the R132 Inner Relief Road Dundalk from Xerox Junction (R132, R215 intersection) heading northwards to The Tain Bridge for a length of c.4km.
- Uisce Éireann Coes Road Upgrade works to be completed by Q4 2029 – Q1 2030.
- Dundalk and Blackrock Flood Relief Scheme
- Dundalk Active Travel Project – Dublin Road (R132) Dundalk, Xerox Junction to Greengates.

7.8.3.1 Surface Water

The policies of Louth County Council (LCC) for the provision of separate Wastewater and Surface Water Drainage systems, together with sustainable drainage systems to treat and attenuate Surface Water discharge in all new developments, shall result in an equivalent stormwater discharge to the existing open watercourse in rainfall events, resulting in a **neutral, long-term** and imperceptible i.e. **not-significant** effect.

In addition the proposed road realignment works along the R172, which will raise the R172 and the proposed development access out of the 0.5% AEP MRFS flood extents, will have no negative impact on the future Dundalk and Blackrock Flood Relief Scheme and shall be considered as part of the Flood Relief Scheme.

7.8.3.2 Wastewater

The Proposed Development will have an imperceptible and neutral effect on the wastewater treatment capacity, in terms of flows, relative to the total amount of wastewater currently being received at the Dundalk Wastewater Treatment Plant (WwTP). Wastewater from the proposed development will drain northwards to the existing Coes Road Pumping Station prior to being pumped to the Dundalk Wastewater Treatment Plan (WwTP). UÉ issued a Confirmation of Feasibility letter. In summary, the CoF letter notes that a wastewater connection for the full development can be facilitated, in advance of upgrade works to the Coe's Road WwPS, via an interim temporary solution whereby flows from the development in excess of 61m3 are stored on the development site during the day (7am to 7pm) and are discharged to the public network during the night (7pm to 7am). An extract from the CoF letter is included below:

"Upgrade works are required to increase the capacity of the existing wastewater network. Uisce Eireann currently has a project on our current investment plan which will provide the necessary upgrade and capacity. This upgrade project is scheduled to be completed by Q1 2030 (this may be subject to change) and the proposed connection could be completed as soon as possible after these works. Customer to engage at Connection Application stage.

Where a connection is proposed in advance of the Coe's Rd project the following interim solution is required to confirm capacity as per below.

Flows from the pumping station constructed under Phase 1 of the development (serving 200 units) shall not be increased during daytime hours (ie 7am to 7pm). This would amount to approximately 61m3 total volume pumped in these hours. The remaining balance of flows (serving 303 units) would be stored during the day then discharged in the night (7pm to 7am). Dosing would be required to avoid septicity. This arrangement would be temporary until the Coe's Road upgrade project is completed. Once this is completed the pumping station can operate as normal throughout the day."

UÉ is in control of this infrastructure and the purpose of the Confirmation of Feasibility Letter is to confirm the viability of the Proposed Development with respect to its potential effect on the capacity of the Dundalk WwTP as the receiving infrastructure. By providing a Confirmation of Feasibility Letter, UÉ has confirmed that the Proposed Development can be accommodated within their existing infrastructure. In addition, the proposed Coe's Road WwPS upgrade works are likely to have commenced construction while the proposed application development is still under construction. As

noted in CoF letter, the interim measures being provided on the development site can be removed once the Coe's Road WwPS upgrade works are completed. As such, the cumulative effect of wastewater drainage from the proposed development is **neutral, imperceptible i.e. not significant** and **long-term**.

7.8.3.3 Water Supply

The effect of the water demand on the Uisce Éireann supply network has been assessed by Uisce Éireann as part of the Pre-Connection Enquiry process. The assessment uses a model of the Dundalk and Blackrock area Water Supply network. Through the pre-connection enquiry process, UÉ assess the feasibility of a connection for all proposed developments prior to granting a connection to their system or deciding on whether network upgrades are required to facilitate same. Where the proposed demand cannot be catered for by the network, Uisce Éireann advise this in their pre-connection enquiry response, citing that either network upgrades are necessary to facilitate the water demand of the proposed development, or potentially, that the scale of development cannot be catered for without large scale upgrades to the network. Uisce Éireann have provided confirmation through the Pre-Connection Enquiry process that the proposed development can be facilitated through the connection of the proposed development's water infrastructure to a recently upgraded 150mm dia. watermain on the R172 Blackrock Road. This correspondence confirms that the assessment of the existing Water Supply network that includes a review of the effect on the existing Water Supply network from both existing and all other known proposed developments is acceptable. The cumulative effects is **neutral, not significant** and **long term**.

7.8.3.4 Electrical Supply

Any redevelopment in the area resulting in an intensification of land use or increased density of occupation would likely lead to an increase in demand on the electricity supply network. While there is substantial existing electricity supply infrastructure in place, continued cumulative development will tend to necessitate future provision of new electricity supply infrastructure with increased capacity. The cumulative effect is a **neutral, not significant** and **short-term** effect.

7.8.3.5 Gas Supply

Any redevelopment in the area resulting in an intensification of land use or increased density of occupation would likely lead to an increase in demand on the gas supply network. As there is no gas infrastructure on the subject site and it is not proposed to provide gas as a utility within the proposed development, it is considered the impact of the proposed development on the existing gas network is **neutral, imperceptible i.e. not significant** and **permanent**.

7.8.3.6 Telecommunications

Any redevelopment in the area resulting in an intensification of land use or increased density of occupation would likely lead to an increase in demand on the telecommunications networks. While there is substantial existing telecommunications infrastructure in place, continued cumulative development will tend to necessitate future provision of new telecommunications infrastructure with increased capacity. The cumulative effect is a **neutral, not-significant** and **short-term** effect.

7.8.4 Summary

The following Table summarises the identified likely significant effects during the construction phase of the proposed development before mitigation measures are applied.

Table 7-1 Summary of Construction Phase Likely Significant Effects in the absence of mitigation

Likely Significant Effect	Quality	Significance	Extent	Probability	Duration	Type
Surface Water – mobilisation of sediments, accidental spills, silts washed into surface water system	Adverse	Moderate / Significant	Local	Likely	Temporary	Direct
Wastewater – temporary discharge, temporary welfare facilities	Adverse	Significant	Local	Likely	Temporary	Direct
Water Supply – temporary connection	Neutral	Imperceptible	Local	Likely	Short Term	Direct
Electricity – temporary connection & diversion	Neutral	Imperceptible	Local	Likely	Short Term	Direct
Gas - Diversion	Neutral	Imperceptible	Local	Not Likely	Short Term	Direct
Telecommunications	Neutral	Imperceptible	Local	Likely	Short Term	Direct

The following Table summarises the identified likely significant effects during the operational phase of the proposed development before mitigation measures are applied.

Table 7-2 Summary of Operational Phase Likely Significant Effects in the absence of mitigation

Likely Significant Effect	Quality	Significance	Extent	Probability	Duration	Type
Surface Water – discharge to existing watercourse	Neutral	Imperceptible	Local	Likely	Permanent	Direct
Wastewater	Neutral	Imperceptible	Local	Likely	Permanent	Direct
Water Supply – impact on existing network	Neutral	Not significant	Local	Likely	Permanent	Direct
Electricity	Neutral	Not significant	Local	Likely	Permanent	Direct
Gas	Neutral	Imperceptible	Local	Likely	Permanent	Direct

Telecommunications	Adverse	Slight	Local	Likely	Permanent	Direct

7.9 Mitigation Measures

7.9.1 Incorporated Design Mitigation

7.9.1.1 Surface Water

Surface Water runoff from the proposed development will be managed in accordance with the requirements of the Greater Dublin Strategic Drainage Study (GDSDS), CIRIA SuDS and Louth County Council Water Services Department (LCC WSD), with Surface Water attenuation and retention included as part of the main Surface Water drainage system. The Surface Water management proposals shall serve to reduce the overall impact of the proposed development on the existing environment. The proposed scheme shall incorporate SuDS treatment process which intercepts Surface Water run-off and treats the water by two stages of filtration and treatment through natural material and conveying this water to storage facilities.

7.9.1.2 Wastewater

The proposed Wastewater drainage system has designed in accordance with the Uisce Éireann Code of Practice for Wastewater Infrastructure IW-CDS-5030-02, IS EN 12056:2000 Gravity Drainage Systems inside Buildings, I.S. EN752: 2017 Drain & Sewer Systems outside Buildings and the Building Regulations Technical Guidance Document Part H. The proposed drainage system will therefore be designed with appropriate capacity for the development to ensure self-cleansing velocities are achieved to reduce the risk of blockages and odours.

7.9.1.3 Water Supply

The proposed watermain infrastructure is designed in accordance with Uisce Éireann's 'Code of Practice for Water Infrastructure IW-CDS-5020-03 and provides appropriate capacity for the development to minimise the risk associated with low service pressure.

7.9.1.4 Electrical Supply

All proposed power cables within the development will be buried underground or internal within buildings and will be installed according to the relevant ESB Networks specifications.

7.9.1.5 Gas Supply

There is no gas infrastructure on the subject site, and it is not proposed to provide gas as a utility within the proposed development.

7.9.1.6 Telecommunications

The proposed telecommunications infrastructure within the development will be buried underground or internal within buildings.

7.9.2 Demolition and Construction Phase Mitigation

7.9.2.1 Surface Water

The Contractor shall prepare and implement a Demolition and Construction Phase Surface Water Management Plan that ensures avoidance and minimisation of effects. Surface Water storage in excavations shall be directed to on-site settlement ponds, where silt removal will be facilitated prior to discharge off site at a controlled and agreed rate in accordance with the greenfield runoff rates for the site. In order to reduce and minimise the risk on impacting the existing water environment from material spillages, all oils, solvents and paints used during construction will be stored within temporary bunded areas or chemical storage containers.

7.9.2.2 Wastewater

The demolition and construction phase discharge of Wastewater to the existing 600mm wastewater sewer to the north-west of the subject site shall comply with the conditions of a Discharge Licence from Uisce Éireann. During construction, all new sewers shall be pressure tested, and CCTV surveyed in accordance with the Uisce Éireann Standards to identify potential defects and such defects, should they arise, shall be repaired prior to the connection.

7.9.2.3 Water Supply

During demolition and construction, the watermains shall be tested in accordance with the requirements of Uisce Éireann (such as pressure testing, water main disinfection, water quality analysis, etc) prior to connection.

7.9.2.4 Electrical Supply

The ESB shall install all of the new incoming supplies to the proposed development. The ESB shall also liaise with residents and keep existing customers fully informed of any brief outages which may be required due to the diversion and undergrounding of the existing overhead 38kV lines or connections to the proposed development. The Contractor shall ensure that construction works on site adhere to the ESB Networks / HSA “Code of Practice for Avoiding Danger from Overhead Electricity Lines”.

7.9.2.5 Gas Supply

There is no gas infrastructure on the subject site, and it is not proposed to provide gas as a utility within the proposed development.

7.9.2.6 Telecommunications

The relevant utility provider shall install the new incoming supplies to the proposed development and shall liaise with existing customers to advise of possible outages in order to facilitate the connections. The works shall be carried out such that they minimise disruption to surrounding areas.

7.9.3 Operational Phase Mitigation

7.9.3.1 Surface Water

Surface Water runoff from the proposed development will be managed in accordance with the requirements of the Greater Dublin Strategic Drainage Study (GDSDS), CIRIA SuDS and the requirements of the Louth County Council Water Services Department (LCC WSD). The Surface Water management proposals shall serve to reduce the overall impact of the proposed development on the existing environment. The features to be maintained include all SuDS features.

7.9.3.2 Wastewater

Uisce Éireann shall implement an operational inspection and maintenance regime to ensure the system keeps operating within the design specifications.

7.9.3.3 Water Supply

The proposed Water Supply system shall be commissioned and subject to a, as a minimum, monthly operational inspection and maintenance regime to ensure the system keeps operating within the design specifications.

7.9.3.4 Electrical Supply

The proposed electricity supply system shall be commissioned and subject to a regular operational inspection and maintenance regime, in accordance with the Utility providers procedures, to ensure the system keeps operating within the design specifications.

7.9.3.5 Gas Supply

There is no gas infrastructure on the subject site, and it is not proposed to provide gas as a utility within the proposed development.

7.9.3.6 Telecommunications

The proposed telecommunications system shall be commissioned and subject to a regular operational inspection and maintenance regime, in accordance with the Utility providers procedures, to ensure the system keeps operating within the design specifications.

7.10 Residual Impact Assessment

This section assesses potential significant environmental impacts which remain after mitigation measures are implemented.

7.10.1 Demolition and Construction Phase

7.10.1.1 Surface Water

The provision of on-site settlement ponds, where silt removal will be facilitated, along with Sustainable Urban Drainage System (SuDS) for the proposed development will ultimately limit Surface Water run-off to 64.50 l/s and 5 l/s from the existing subject site, which is the allowable green-field run-off rate. This is a **neutral, imperceptible i.e. not significant** and **permanent** effect.

7.10.1.2 Wastewater

Wastewater from the proposed development will drain northwards to the existing Coes Road Pumping Station prior to being pumped to the Dundalk Wastewater Treatment Plant (WwTP). The WwTP has the capacity to cater for a population of 220,000. UÉ issued a Confirmation of Feasibility letter. In summary, the CoF letter notes that a wastewater connection for the full development can be facilitated, in advance of upgrade works to the Coe's Road WwPS, via an interim temporary solution whereby flows from the development in excess of 61m3 are stored on the development site during the day (7am to 7pm) and are discharged to the public network during the night (7pm to 7am). An extract from the CoF letter is included below:

"Upgrade works are required to increase the capacity of the existing wastewater network. Uisce Eireann currently has a project on our current investment plan which will provide the necessary upgrade and capacity. This upgrade project is scheduled to be completed by Q1 2030 (this may be subject to change) and the proposed connection could be completed as soon as possible after these works. Customer to engage at Connection Application stage.

Where a connection is proposed in advance of the Coe's Rd project the following interim solution is required to confirm capacity as per below.

Flows from the pumping station constructed under Phase 1 of the development (serving 200 units) shall not be increased during daytime hours (ie 7am to 7pm). This would amount to approximately 61m3 total volume pumped in these hours. The remaining balance of flows (serving 303 units) would be stored during the day then discharged in the night (7pm to 7am). Dosing would be required to avoid septicity. This arrangement would be temporary until the Coe's Road upgrade project is completed. Once this is completed the pumping station can operate as normal throughout the day."

This is a neutral, significant and permanent effect.

7.10.1.3 Water Supply

It is considered that the residual effects on the existing Water Supply network will be **neutral, not significant** and **permanent**.

7.10.1.4 Electrical Supply

The proposed development will increase the demand on the electricity supply system. However, it is expected that infrastructural requirements for future development will be accommodated by ESB Networks. This is a **neutral, moderate i.e. not significant** and **short-term** effect.

7.10.1.5 Gas Supply

There is no gas infrastructure on the subject site, and it is not proposed to provide gas as a utility within the proposed development. Therefore, it is considered the impact of the proposed development on the existing gas network is **neutral, imperceptible i.e. not significant** and **permanent**.

7.10.1.6 Telecommunications

The proposed development will increase the demand on the telecommunications systems. However, it is expected that infrastructural requirements for future development will be accommodated by utility service providers. This is a **neutral, moderate i.e. not significant** and **short-term** effect.

7.10.2 Operational Phase

7.10.2.1 Surface Water

The provision of a Sustainable Urban Drainage System (SuDS) for the proposed development will ultimately limit Surface Water run-off to 64.50 l/s and 5 l/s from the existing subject site which is the allowable green-field run-off rate. This is a **neutral, imperceptible i.e. not significant** and **permanent** effect.

7.10.2.2 Wastewater

Uisce Éireann shall implement an operational inspection and maintenance regime to ensure the system keeps operating within the design specifications. This is a **positive, significant** and **permanent** effect.

7.10.2.3 Water Supply

The proposed Water Supply system shall be commissioned and subject to a, as a minimum, monthly operational inspection and maintenance regime to ensure the system keeps operating within the design specifications. This is a **positive, significant** and **permanent** effect.

7.10.2.4 Electrical Supply

The proposed electricity supply system shall be commissioned and subject to a regular operational inspection and maintenance regime, in accordance with the Utility providers procedures, to ensure the system keeps operating within the design specifications. This is a **neutral, moderate i.e. not significant** and **long-term** effect.

7.10.2.5 Gas Supply

There is no gas infrastructure on the subject site, and it is not proposed to provide gas as a utility within the proposed development. Therefore, it is considered the impact of the proposed development on the existing gas network is **neutral, imperceptible i.e. not significant** and **permanent**.

7.10.2.6 Telecommunications

The proposed telecommunications system shall be commissioned and subject to a regular operational inspection and maintenance regime, in accordance with the Utility providers procedures, to ensure the system keeps operating within the design specifications. This is a **neutral, moderate i.e. not significant** and **long-term** effect.

7.10.3 Summary of Post-mitigation Effects

The following Table summarises the identified likely significant residual effects during the construction phase of the proposed development following the application of mitigation measures.

Table 7-3 Summary of Construction Phase Effects Post Mitigation

Likely Significant Effect	Quality	Significance	Extent	Probability	Duration	Type
Short-term disruption to water supply	Neutral	Imperceptible	Local	Likely	Brief	Direct
Surface Water Drainage	Positive	Imperceptible	Local	Likely	Brief	Direct
Wastewater Drainage	Positive	Imperceptible	Local	Likely	Brief	Direct
Water Supply	Positive	Imperceptible	Local	Likely	Brief	Direct
Electricity	Positive	Imperceptible	Local	Likely	Brief	Direct
Gas	Neutral	Imperceptible	Local	Likely	Permanent	Direct
Telecommunications	Positive	Imperceptible	Local	Likely	Brief	Direct

The following Table summarises the identified likely residual significant effects during the operational phase of the proposed development post mitigation.

Table 7-4 Summary of Operational Phase Effects Post Mitigation

Likely Significant Effect	Quality	Significance	Extent	Probability	Duration	Type
Surface Water Drainage	Positive	Imperceptible	Local	Likely	Permanent	Direct
Wastewater Drainage	Positive	Significant	Local	Likely	Permanent	Direct
Water Supply	Positive	Significant	Local	Likely	Permanent	Direct
Electricity	Neutral	Moderate	Local	Likely	Long-term	Direct
Gas	Neutral	Moderate	Local	Likely	Long-term	Direct
Telecommunications	Neutral	Moderate	Local	Likely	Long-term	Direct

7.10.4 Cumulative Residual Effects

The proposed development is unlikely to have any residual impacts with the implementation of the appropriate mitigation measures.

7.10.4.1 Surface Water

The provision of a Sustainable Urban Drainage System (SuDS) for the proposed development will ultimately limit Surface Water run-off to 64.50 l/s and 5 l/s from the existing subject site which is the allowable green-field run-off rate. Along with the above-mentioned mitigation measures, the cumulative residual effect is considered to be **neutral, imperceptible i.e. not significant** and **permanent**.

7.10.4.2 Wastewater

An interim solution will be implemented as detailed in Section 7.8.3.2 in advance of the upgrade works to Coes Road pumping station which are to be completed by Q1 2030. UÉ is in control of infrastructure serving the public and the purpose of the Confirmation of Feasibility Letter is to confirm the viability of the Proposed Development with respect to its potential effect on the capacity of the Dundalk WwTP as the receiving infrastructure. By providing a Confirmation of Feasibility Letter, UÉ has confirmed that the Proposed Development can be accommodated within their existing infrastructure (with the site interim solution) as well as their future upgrade works (which will allow the interim solution to be decommissioned). As such, the cumulative residual effect is considered to be **neutral, imperceptible i.e. not significant** and **permanent**.

7.10.4.3 Water Supply

Uisce Éireann have provided confirmation through the Confirmation of Feasibility Letter that the proposed development can be facilitated through the connection of the proposed development's water infrastructure to a recently upgraded 150mm dia. watermain on the R172 Blackrock Road. This correspondence confirms that the assessment of the existing Water Supply network that includes a review of the effect on the existing Water Supply network from both existing and all other known proposed developments is acceptable. The cumulative residual effect is **neutral, imperceptible i.e. not significant** and **permanent**.

7.10.4.4 Electrical Supply

While there is substantial existing electricity supply infrastructure in place, continued cumulative development will tend to necessitate future provision of new electricity supply infrastructure with increased capacity. The cumulative residual effect is **neutral, moderate i.e. not significant** and **long-term**.

7.10.4.5 Gas Supply

As there are no demands for gas on site there should be **no cumulative residual effect** to the gas supply infrastructure.

7.10.4.6 Telecommunications

While there is substantial existing telecommunications infrastructure in place, continued cumulative development will tend to necessitate future provision of new telecommunications infrastructure with increased capacity. The cumulative residual effect is **neutral, moderate i.e. not significant** and **long-term**.

7.11 Risk of Major Accidents or Disasters

There are no expected significant adverse effects of the project on the environment deriving from the vulnerability of the project to risks of major accidents and/or disasters which are relevant to the project concerned.

7.12 Worst Case Scenario

7.12.1 Surface Water

The 'worst-case' scenario is that flooding occurs on-site and in the surrounding area due to this development. The design of the new drainage system ensures that the pipe sizes, gradients etc. will be adequate for the design stormwater flows plus 20% Climate Change in accordance with Louth County Council Water Services requirements.

7.12.2 Wastewater

The 'worst-case' scenario resulting from the construction of the development would result in the contamination of groundwater and the local streams by Wastewater effluent from the development. However, the mitigation measures outlined are standard and proven to ensure that this is not likely to occur.

7.12.3 Water Supply

The 'worst-case' scenario would be the pollution of the Water Supply by an accidental spillage or contamination during the connection process. However, the mitigation measures proposed are standard and proven to ensure that this will not occur. Prior to connection to the public watermain, all watermains in the development will be tested and cleaned to the requirements of Uisce Éireann.

7.12.4 Electrical Supply

The 'worst-case' scenario would be the striking of the existing overhead power lines which traverse the subject site which would be fatal and lead to an unplanned power outage. The Contractor shall liaise at all times with the ESB and adhere to the ESB/ HSA "Code of Practice for Avoiding Danger from Overhead Electricity Lines to mitigate against this.

7.12.5 Gas Supply

The 'worst-case' scenario would be striking the existing gas infrastructure during excavation works and causing an unplanned outage of service to customers. The Contractor shall ensure that all of the works will be carried out by authorised personnel who have expertise in the required works. This will minimise disruption to surrounding areas.

7.12.6 Telecommunications

The 'worst-case' scenario would be striking the existing telecommunications infrastructure during excavation works and causing an unplanned outage of service to customers. The Contractor shall ensure that all of the works will be carried out by authorised personnel who have expertise in the required works. This will minimise disruption to surrounding areas.

7.13 Interactions

Interactions are dealt with in Chapter 16 of this EIAR.

7.14 Monitoring

7.14.1 Surface Water

During the construction of the Surface Water drainage, the system shall be inspected and monitored for compliance with the design and relevant Louth Co. Co. and GDSDS standards in accordance with the Preliminary Inspection Plan. The requisite air and pressure testing shall be carried out on all sewer installations during construction while exfiltration testing shall be carried out on all manholes. Records of these tests shall be maintained by the Contractor. The connection to the existing open water course will not be made until all the works are complete within each Phase, and temporary surface water management will remain in place until this time to ensure only clean, uncontaminated surface water is discharged to the existing open water course.

7.14.2 Wastewater

During the construction of the Wastewater drainage, the system shall be inspected, tested and monitored in accordance with the requirements of the relevant Uisce Éireann Wastewater Code of Practice (IW-CDS-5030-03). Records of these tests shall be maintained by the Contractor as required and shall be witnessed by Uisce Éireann in accordance with the relevant Quality Procedures. The connection to the existing Wastewater network will not be made until all the works are complete within each Phase, and temporary Wastewater management associated with the Contractor's compound will remain in place until this time.

7.14.3 Water Supply

During the construction of the water supply network, the system shall be inspected, tested and monitored in accordance with the requirements of the relevant Uisce Éireann Code of Practice. Records of these tests shall be maintained by the Contractor as required and shall be witnessed by Uisce Éireann in accordance with the relevant Quality Procedures. The connection to the existing water supply network will not be made until all the works are complete within each Phase and temporary water connection associated with the Contractor's compound will remain in place until this time.

7.14.4 Electrical Supply

The ESB shall monitor the existing and proposed networks during the diversion and undergrounding of the existing over-head 20kV and 38kV powerlines. The ESB shall carry out ongoing testing and commissioning of the installed infrastructure during construction.

7.14.5 Gas Supply

There is no gas infrastructure on the subject site, and it is not proposed to provide gas as a utility within the proposed development. Therefore, monitoring of this utility is not required.

7.14.6 Telecommunications

The incoming telecommunications provider shall monitor the existing and proposed networks during the installation of the proposed telecommunications network throughout the site during construction. The incoming telecommunications provider shall carry out ongoing testing and commissioning of the installed infrastructure during construction.

7.15 Summary of Mitigation and Monitoring

The following Table summarises the Construction Phase mitigation and monitoring measures.

Table 7-5 Summary of Construction Phase Mitigation and Monitoring

Likely Significant Effect	Mitigation	Monitoring
Contamination of local surface water sewer	Testing Prior to Connection to public network	Ongoing inspections by Applicant's Engineer
Wastewater Drainage system	Testing & commissioning of new network	Ongoing inspections by Applicant's Engineer and Uisce Éireann
Contamination of local water supply from new connections	Testing Prior to Connection to public network	Ongoing Inspections by UÉ and Applicant's Engineers
Impact of ESB diversion on public supply	Testing and commissioning of diverted network	ESB to monitor all works
Impact on existing gas network	No works proposed	GNI provider to monitor existing network
Impact on existing Telecommunications network	Testing and commissioning of new network connections	Utility provider to monitor all works

The following Table summarises the Operational Phase mitigation and monitoring measures.

Table 7-6 Summary of Operational Phase Mitigation and Monitoring

Likely Significant Effect	Mitigation	Monitoring
Silting/blocking of SuDS	Regular maintenance regime	Periodic inspections by local authority
Potential leaks in wastewater system	Regular maintenance regime	Periodic inspections by Uisce Éireann.
Leakage and water loss from water supply system	Construction in accordance with UÉ COP. Metering of supply.	Review and assessment of water meter readings. Water Audit by Uisce Éireann.
Increase in electrical load	Regular monitoring & maintenance	ESB periodic inspections

Gas	No works proposed to the gas network	GNI periodic inspections
Increase on existing network	Regular monitoring & maintenance	Telecommunications provider

7.16 Conclusion

The assessment has found that there will no significant negative effects in terms of Material Assets, either from the development when considered alone, or in combination with other developments, during either the construction or operational phases of the development.

7.17 References and Sources

- Louth County Development Plan 2021 – 2027
- The Greater Dublin Region Code of Practice for Drainage Works, 2012, Fingal County Council, Dublin City Council, Dún Laoghaire-Rathdown County Council, South Dublin County Council, Wicklow County Council, Kildare County Council, Meath County Council
- Greater Dublin Strategic Drainage Study, 2005, Fingal County Council, Dublin City Council, Dún Laoghaire-Rathdown County Council, South Dublin County Council, Wicklow County Council, Kildare County Council, Meath County Council
- I.S. EN752:2017 Drain & Sewer Systems outside Buildings, 2017, National Standards Authority of Ireland
- I.S. EN12056:2000 Gravity Drainage Systems inside Buildings, 2000, National Standards Authority of Ireland
- Code of Practice for Water Infrastructure CDS-5020-03, 2020, Uisce Éireann
- Code of Practice for Wastewater Infrastructure CDS-5030-03, 2020, Uisce Éireann
- Wastewater Treatment Manuals, 1999, Environmental Protection Agency
- Control of Water Pollution from Construction Sites, 2001, Construction Industry Research and Information Association
- Technical Guidance Document H Drainage & Wastewater Disposal, 2016, Department of Housing, Planning, Community and Local Government
- The SuDS Manual C753, 2015, Construction Industry Research and Information Association
- Infrastructure Design Report, 2025, Donnachadh O'Brien & Associates Consulting Engineers
- Construction Environmental Management Plan, 2025, Donnachadh O'Brien & Associates Consulting Engineers
- Site Specific Flood Risk Assessment, 20253, IE Consulting

Haggardstown LRD

Dundalk, Co. Louth

Main Statement

Volume II

CHAPTER 8

Material Assets: Waste

May 2025

McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

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8 Material Assets: Waste

8.1 Introduction

This chapter of the EIAR was prepared to assess the potential significant effects of the proposed development on waste management.

This Chapter has been prepared having regard to the information contained in the *Outline Construction Environmental Management Plan* and *Operational Waste Management Plan* prepared for the proposed development by (Donnachadh O'Brien & Associates Consulting Engineers, 2025) and submitted under separate cover.

8.2 Expertise & Qualifications

This chapter of the EIAR has been prepared by Laura Griffin of Enviroguide Consulting (a DNV Company).

Laura holds a Master of Science (Hons) degree in Climate Change from Maynooth University and a Bachelor of Arts (Hons) degree in English and Geography from Maynooth University. Laura has been working as an Environmental Consultant with Enviroguide since 2021 and has 5 years of professional experience. Laura has built up experience in EIAs for a range of residential and commercial developments, particularly for LRD (previously SHD) projects in Dublin and across Ireland. Laura's experience includes EIA Screening, EIAR report writing and coordination, Air Quality Assessment Reports, Resource Waste Management Plans and Construction Environmental Management Plans. Laura has been involved in the preparation of EIARs for the following projects:

- Donore Project (St. Teresa's Gardens):
  - Project Description: Residential scheme on a 3.26-hectare site with a net developable area of 2.05 hectares on the former St. Teresa's Gardens, Donore Avenue, Dublin 8.
  - Scale: Residential scheme of 543 no. apartments and crèche.
- Blessington Phase 2 and 3:
  - Project Description: Large Scale-Residential Development and residential led master plan at a c. 25.14-hectare site within the townlands of Blessington Demesne, Newpaddocks and Santryhill, Blessington, Co. Wicklow.
  - Scale: 329 no. residential units and the extension of the Blessington Inner Relief Road (approx. 700m long) from the existing 4-arm roundabout at Blessington Demesne Lands, running northwest of Blessington Business Park, and north of the Woodleigh residential area to a new four-arm roundabout junction on the N81 Dublin Road.
- Athlone LRD:
  - Project Description: 10-year permission for the provision of residential development on lands located within the townlands of Ballkeeran and Cornamaddy, Athlone, Co. Westmeath.
  - Scale: 332 no. residential unit masterplan with a 2-storey crèche.

8.3 Proposed Development

The proposed development is described in Chapter 2. The development generally comprises of 502 no. residential units, comprising 1, 2, 3 and 4 bed units in a mix of maisonettes, terraced and semi-detached units, with 1 no. detached bungalow unit; Creche building and all associated site and development works including landscaping and amenity areas, infrastructure and services, and new entrance from Blackrock Road, with additional pedestrian/cycle access from Bóthar Maol.

8.3.1 Aspects Relevant to this Chapter

The waste management objectives for the proposed development are as follows, and will facilitate material reuse and recycling, where possible, and seek to divert waste from landfill:

- Prevention: The Principal Contractor will prevent and minimise waste generation where possible by ensuring large surpluses of construction materials are not delivered to the site through coordination with the suppliers, operating a 'just-in-time' delivery scheme and ensuring sub-contractors conform to the Contractor(s) Construction and Environmental Management Plan (CEMP), being an update to the principles set out in the Outline CEMP submitted with this application;
- Reuse: Reusing wastes and surplus materials where feasible and in as many high value uses as possible;
- Recycle: Recycling wastes where possible such as introducing on site crushers to produce waste derived aggregates which, subject to appropriate testing and approvals, may be re-used in the proposed development; and
- Disposal: Where disposal of waste is unavoidable, this will be undertaken in accordance with the Waste Management Act 1996, as amended.

8.3.2 Construction Phase

All construction works will occur following a phased process. However, the entire Construction Phase will involve site preparation works, the establishment of construction services and the construction of the proposed residential units. Site preparation works will involve site clearance, establishing entranceways and haul roads for vehicles, surveying and setting out, setting up the construction site fencing and compounds.

8.3.3 Operational Phase

The Operational Phase of the proposed development will consist of the normal day-to-day operations necessary for the management and maintenance of the residential units and crèche.

An Operational Waste Management Plan (OWMP) has been prepared by DOBA (2025) and has been submitted with this planning application. Adherence to the OWMP will facilitate a high level of recycling, reuse, and recover at the Proposed Development during the Operational Phase.

8.4 Methodology

8.4.1 Relevant Legislation & Guidance

The methodology adopted for the assessment takes cognisance of the relevant guidelines, in particular the following:

- Environmental Protection Agency (2022) Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR);
- EPA (2021) Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for Construction and Demolition Projects;
- Waste Framework Directive (Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste) as amended by Directive (EU) 2018/851;
- European Union (Waste Directive) Regulations 2020, S.I. No. 323 of 2020
- Waste Management Acts 1996 (as amended);
- The National Waste Management Plan for a Circular Economy 2024-2030; and
- Louth County Development Plan 2021-2027.

The scope of the work undertaken for the impact assessment included desk-based study of waste management services within the defined study area. The desk study involved collecting all the relevant data for the proposed development site and surrounding area including published information and details pertaining to the proposed development provided by the Applicant and design team. Information on waste management in the vicinity of the site of the proposed development will be assembled by reviewing the following information:

- Oultine Construction Environmental Management Plan (DOBA, 2025);
- Operational Waste Management Plan (DOBA, 2025); and
- http://mywaste.ie

8.4.2 Description and Assessment of Potential Impacts

Impacts vary in quality from negative, to neutral or positive. The effects of impacts will vary in significance on the receiving environment. Effects will also vary in duration. The terminology and methodology used for assessing the 'impact' significance and the corresponding 'effect' throughout this chapter is as described in Chapter 1 of this EIAR.

8.4.3 Local and National Waste Action Plans

The *National Waste Management Plan for a Circular Economy* (NWMPCE) 2024 -2030, sets out the framework for the prevention and management of waste across Ireland. This document is a statutory document underpinned by national and EU waste legislation, and reflects the targets set out for C & D waste in the Waste Framework Directive (WFD).

The strategic vision of the Plan is to rethink the approach to managing waste, and to move towards a 'circular economy' approach where resources are reused or recycled as much as possible, and the overall generation of waste is minimised.

In order to achieve this vision, the Plan has set out a number of specific and measurable performance targets in relation to construction and demolition waste:

- Achieve a 2% reduction per annum is proposed for total construction and demolition waste to achieve a cumulative 12% reduction by 2030 (baseline is 9 million tonnes); and
- Achieve 70% C & D waste sent for reuse, recycling and other recovery of construction and demolition waste (excluding natural soils and stones and hazardous wastes).

The Plan aims to "*prioritise waste prevention and circularity in the construction and demolition sector to reduce the resources that need to be captured as waste".* In order to achieve the objectives, set out in NWMPCE, it is imperative that robust resource and waste management plans are developed for and designed into the pre-construction, Construction and Operational Phases of the proposed development.

8.4.4 Article 27 of the European Communities (Waste Directive) Regulations 2011

Under Article 27 of the European Communities (Waste Directive) Regulations 2011 (SI No. 126 of 2011) as amended (referred to hereafter as Article 27), uncontaminated soil and stone free from anthropogenic contamination which is excavated during the construction phase of a development can be considered a by-product and not a waste, if (a) further beneficial use of the material is certain, (b) it can be used directly without any further processing, (c) it is produced as an integral part of the development works and (d) the use is lawful and will not have any adverse environmental or human health impacts (EPA, 2019).

For Article 27 to apply, the beneficial use mentioned in point (a) above must be identified for the entirety of the excavated soil from the proposed development prior to its production, with that use taking place within a definite timeframe, for it to be regarded as certain.

8.5 Difficulties Encountered

No difficulties were encountered while compiling this chapter.

8.6 Baseline Environment

8.6.1 Soils

The following can be read in conjunction with Chapter 9 of this EIAR – Land & Soils, including relevant mapping.

The soils beneath the subject site are mapped by the GSI (GSI, 2025) as follows:

- The soils beneath the main subject site area are mapped as Acid Brown Earths, Brown Podzolics within the category of deep well drained mineral (mainly acidic) (IFS soil code: TLPSsS). The parent material is 'till derived from Lower Palaeozoic rocks';
- Lithosols, Regosols within the category of shallow well drained mineral (mainly acidic) soils are mapped in small pockets across the main site area. The parent material for this soil is 'bedrock at surface – non calcareous';
- The soils beneath the portion of the site extending along the R172 Blackrock Road and Finnabair Crescent are mapped as Surface Water Gleys, Groundwater Gleys. The parent material for these is 'Irish Sea tills'; and
- The soils beneath the portion of the site where the eastern site boundary extends toward the Dundalk estuary (i.e., at the entrance to the proposed development) are mapped as 'Beach Sand and Gravels'.

8.6.1.1 Quaternary Soils

The quaternary soils beneath the site are mapped by the GSI (GSI, 2025) as follows:

- The quaternary soils beneath the main subject site area are mapped as till derived from 'Lower Palaeozoic sandstones and shales' (TLPSsS);
- The quaternary soils beneath the portion of the subject site where the eastern site boundary extends toward the Dundalk estuary (i.e., at the entrance to the proposed development) are mapped as 'marine gravel and sands (often raised)' (MGs);
- The quaternary soils beneath the portion of the site extending along the R172 Blackrock Road and Finnabair Crescent are mapped as 'Irish Sea Till derived from Lower Palaeozoic sandstones and shales' (IrSTLPSsS).

8.6.2 Bedrock Geology

Based on the GSI database (GSI, 2025) the bedrock beneath the subject site is mapped as the Clontail Formation (CLTL) which is comprised of calcareous red-mica greywacke. The lithological description for the bedrock is described as green-grey, medium to thickly bedded, coarse and very fine grained tae greywackes, with dark grey thinly bedded, poorly graded quartzose fine sandstone to siltstone units. Both lithologies contain distinctive brown-red coloured biotite. Refer to Chapter 9 of this EIAR – Land & Soils for further detail and mapping.

8.6.3 Invasive Species

An invasive alien species survey was undertaken at the site in July 2021 by INVAS Biosecurity (INVAS, 2021). This survey recorded no evidence, at that time, of any Invasive Alien Plant Species as listed on the 'Third Schedule' of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.1.477 of 2011) or the Invasive Alien Species Regulation (EU) 1143/2014 being present on the site. Cherry laurel (*Prunus laurocerasus*) and Buddleja (*Buddleja davidii*) were detected along the site boundaries. Russian vine (*Fallopia baldschuanica)* was recorded in a nearby housing estate. All three species can be locally problematic plants but are not included on any legislative lists or regulations and can be carefully managed as part of general site clearance works, where necessary.

One high impact invasive flora species was recorded at the site during ecological walkovers conducted by Enviroguide in 2023; Cherry Laurel (*Prunus laurocerasus)*, located at various locations along hedgerows to the north and west of the site. These plants are located along the boundary between the application site and neighbouring property. No species of plant listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations, 2011 were recorded at the site during site surveys.

8.7 The 'Do Nothing' Scenario

In the 'Do Nothing' scenario, the proposed development does not proceed and there would be no excavation, construction or operational waste generated at the site. There would, therefore, be no additional demand or loading on waste management infrastructure locally or nationally and thus there would be a neutral effect on the environment in terms of waste. However, given the zoning and planning context, it is reasonable to expect that a similar residential development could be proposed for the site and in such case similar effects as described above would be expected.

8.8 Potential Significant Effects

8.8.1 Construction and Demolition Phase

The Construction Phase will give rise to the requirement to remove and bring quantities of various materials to and from the site. Construction and excavation related wastes will be created during the Construction Phase, and this has the potential to impact on the local waste management network.

A Construction Waste Management Plan (CWMP) is contained within the Outline CEMP which has been prepared by DOBA (2025) for Construction Phase of the proposed development and is submitted under separate cover.

There are 5 no. concrete foundations existing on the site which will be removed prior to the construction of the proposed development.

There are no buildings on site requiring an asbestos survey. Should Asbestos-containing Materials (ACMs) be uncovered during the works, the Contractor will handle ACMs in accordance with the Safety, Health and Welfare at Work (Exposure to Asbestos) Regulations 2006, as amended and associated approved Codes of Practice. The Contractor shall be responsible for preparing specified Risk Assessment and Method Statements for the identification and removal of all ACMs on site.

The typical types of Construction Hazardous and Non-Hazardous Wastes that may be expected on a typical project are as per the EPA List of Wastes (LOW) codes outlined in Table 8-1.

Table 8-1 EPA Hazardous and Non-Hazardous EPA LoW and Associated Waste Codes

Description	EPA LoW Codes
Hazardous Waste	
Wastes from Wood processing and the production of panels and furniture, pulp, paper and cardboard	**03**

Wastes from wood preservation	**03 02**
Non-halogenated organic wood preservatives	03 02 01
Organ chlorinated wood preservatives	03 02 02
Organometallic wood preservatives	03 02 03
Inorganic wood preservatives	03 02 04
Other wood preservatives containing hazardous substances	03 02 05
Wood preservatives not otherwise specified	03 02 09
Oil Wastes and Wastes of Liquid Fuels	**13**
Wastes of Liquid Fuels	**13 07**
Fuel oil and diesel	13 07 01
Petrol	13 07 02
Other fuels (including mixtures)	13 07 03
Wastes not otherwise specified in the list	**16**
Wastes from electrical and electronic equipment	**16 02**
Transformers and capacitors containing PCBs	16 02 09
Discarded equipment containing chlorofluorocarbons, HCFC, HFC	16 02 11
Discarded equipment containing free asbestos	16 02 12
Discarded equipment other than those mentioned in 16 02 09 to 16 02 13	16 02 14
Hazardous components removed from discarded equipment	16 02 15
Batteries and Accumulators	**16 06**
Lead Batteries	16 06 01
Ni-Cd Batteries	16 06 02
Mercury-containing batteries	16 06 03
Alkaline batteries (except 16 06 03)	16 06 04
Other batteries and accumulators	16 06 05
Separately collected electrolyte from batteries and accumulators	16 06 06
Construction Wastes (Including excavated soil from contaminated sites)	**17**
Mixtures of, or separate fractions of concrete, bricks, tiles and ceramics containing hazardous substances	17 01 06
Glass, plastic and wood containing or contaminated with hazardous substances	17 02 04
Metals (including their alloys)	**17 04**
Metal Waste contaminated with hazardous substance	17 04 09
Cables containing oil, coal tar and other hazardous substance	17 04 10
Soil (including excavated soil from contaminated sites), stones and dredging spoil	**17 05**

Soil and stones containing hazardous substances	17 05 03
Insulation materials and asbestos containing construction materials	**17 06**
Insulation materials containing asbestos	17 06 01
Other insulation materials consisting of or containing hazardous substances	17 06 03
Construction materials containing asbestos	17 06 05
Gypsum-based construction material	**17 08**
Gypsum-based construction materials contaminated with hazardous substances	17 08 01
Other construction Wastes	**17 09**
Construction Wastes containing mercury	17 09 01
Construction Wastes containing PCBs	17 09 02
Construction Wastes containing dangerous substances	17 09 03
Municipal Wastes (Household Waste & Similar Commercial Waste, Industrial & Institutional Waste) including separately collected fractions	**20**
Fluorescent tubes and other mercury containing Waste	20 01 21
Paint, inks, adhesives and resins containing hazardous substances	20 01 22
Non-Hazardous Waste	
Construction Wastes (including excavated soil from contaminated sites)	**17**
Concrete, bricks tiles and ceramics	**17 01**
Concrete	17 01 01
Bricks	17 01 02
Tiles and ceramics	17 01 03
Wood, glass and plastic	**17 02**
Wood	17 02 01
Glass	17 02 02
Plastic	17 02 03
Bituminous mixtures, coal tar and tarred products	**17 03**
Bituminous mixtures containing coal tar	17 03 01
Coal tar and tarred products	17 03 03
Metals (including their alloys)	**17 04**
Copper, bronze, brass	17 04 01
Aluminium	17 04 02
Lead	17 04 03
Zinc	17 04 04
Iron and steel	17 04 05

Tin	17 04 06
Mixed Metals	17 04 07
Municipal Wastes (Household Waste & Similar Commercial Waste, Industrial & Institutional Waste) including separately collected fractions	**20**
Separately collected fractions	**20 01**
Paper and cardboard	20 01 01
Glass	20 01 02
Biodegradable kitchen and canteen Waste	20 01 08
Textiles	20 01 11
Edible oil and fat	20 01 25

The proposed development will require excavation for the following non-exhaustive list of activities with associated approximate volumes of the materials to be excavated:

- Topsoil: 53,000m^3
- Subsoils from reduced level excavations: 32,500m^3
- Subsoils for main drainage and attenuation: 10,000m^3
- Rock for main drainage and attenuation : 5,000m^3
- Subsoils for site services: 10,000m^3

The re-use of clean, inert / non-hazardous excavation material as landscaping or engineering fill will also be considered following appropriate material testing and risk assessment to ensure the material is suitable for its proposed end use.

The following quantities are assumed to be reused in the proposed development:

- Topsoil: 28,000m^3
- Subsoils from reduced level excavations: 6,500m^3
- Rock for main drainage: 5,000m^3

Where excavation material may not be re-used within the proposed works the Contractor will endeavour to send material for recovery or recycling so far as is reasonably practicable or disposal to an appropriate licensed landfill in accordance with the Landfill Directive.

The following quantities are assumed to be removed offsite for reuse or to an appropriate licenced landfill:

- Topsoil: 25,000m^3
- Subsoils from reduced level excavations: 26,000m^3
- Subsoils for main drainage and attenuation: 10,000m^3

- Subsoils for site services: 10,000m^3

Any potentially contaminated material encountered during construction, will require testing and classification as either non-hazardous or hazardous in accordance with the EPA publication entitled 'Waste Classification: List of Waste & Determining if Waste is Hazardous or Non-Hazardous using the HazWasteOnline application. The material will then need to be classified as clean, inert, non-hazardous or hazardous in accordance with the EC Council Decision 2003/33/EC. The Contractor will be responsible for determining how excavation material from the proposed development will be managed and a full list of all facilities to which hazardous and non-hazardous waste excavation soil and stones will be sent will be provided in the detailed CMP prepared by the Contractor.

All waste generated during the Construction Phase will be segregated on site to enable ease of re-use and recycling, wherever appropriate. Material will be segregated on site for the appropriate waste stream and disposal destination. The Construction Waste Manager or appointed delegate will ensure waste streams are adequately identified. The segregation and management of waste storage and stockpiling will be routinely inspected and audited by the Construction Waste Manager.

It is intended, where possible, to maximise the reuse of clean/non-hazardous excavation material as landscaping or engineering fill following appropriate material testing and risk assessment to ensure the material is suitable for its proposed end use, to avoid importing raw materials. Excavated soil and stone pending reuse in the proposed development will be temporarily stockpiled in designated areas on site during the Construction Phase.

Where removal of Wastes from the proposed development is unavoidable it will be delivered by the Contractor to licensed Waste facilities which are authorised under the Waste Management Act 1996, as amended, and which hold the appropriate certificate of registration, Waste facility permit or EPA licence.

EPA licensed Waste activities authorised to accept soil and stones for recovery and disposal include soil recovery sites, landfills, transfer stations and materials recovery facilities which typically handle a larger tonnage of Wastes than facilities holding certificates of registration of Waste facility permits.

Where the Contractor proposes to deliver excavated materials from the proposed development to facilities holding a certificate of registration, Waste facility permit or EPA Waste licence the Contractor is responsible for ensuring the authorisation is valid and allows acceptance of the relevant List of Waste Code. A copy of the authorisation will be included in the CWMP, and evidence will be provided that the proposed facility will have capacity to accept the required quantity of Waste from the proposed development.

The Building Research Establishment (BRE) UK have produced benchmarks derived from data out of the BRE SMARTWASTE Plan issued in June 2012 as outlined in Table 8-2.

Table 8-2 BRE SMARTWASTE Benchmark Data by Project Type (Source: BRE UK)

Project Type	Number of Projects Data Relates to	Average m^3/100m^2	Number of Projects Data Relates to	Average m^3/ £100K
Residential	677	18.1	669	12.3
Public Buildings	49	20.9	55	10.7

Leisure	71	14.4	69	9.2
Industrial Buildings	54	13.0	55	10.8
Healthcare	86	19.1	85	9.1
Education	263	20.7	272	10.0
Commercial Other	4	17.4	2	9.7
Commercial Offices	60	19.8	56	9.3
Commercial Retail	123	20.9	122	15.0
Total Number of Projects	1387		1385	

The Outline CEMP breaks down the quantities of construction waste which will be produced based on BRE data outlined in Table 8-3.

Table 8-3 Quantities of Proposed Construction Waste (DOBA, 2025)

Type	Proposed Internal Floor Area (m^2)	Average $m^3/100m^2$	Construction Waste (m^3)
Residential	c. 51,440	18.10	9,303
Crèche	c. 571	17.40	100

Therefore, the total Waste from buildings to be generated during the Construction Phase of the project is estimated at c. 9,403m^3. The Contractor will ensure that waste generation on site is minimised and that waste removed from site for recovery or disposal is reduced where feasible.

The Contractor will vet the source of aggregate, fill material and topsoil imported to the site in order to ensure that it is of a reputable origin and that it is "clean" (i.e., it will not contaminate the environment). The Contractor and/or Louth County Council will implement procurement procedures to ensure that aggregate, fill material and topsoil are acquired from reputable sources with suitable environmental management systems as well as regulatory and legal compliance.

Waste will be generated during the construction of the dwelling units and the ancillary infrastructure at the site. There will be a surplus of material such as off-cuts of timber, broken concrete blocks, plasterboard, tiles, and packaging waste. The waste materials will be segregated at source and stored in suitably size receptables and transferred offsite for appropriate processing, recycling and recovery. Waste materials generated from the Construction Phase that are unsuitable for reuse or recovery will be separately collected. Disposal of construction generated wastes will be considered a last resort, once recycling or recovery options have been ruled out. Waste will be collected as appropriate by suitably qualified and permitted nominated waste management contractors.

It is not envisaged that there will be any hazardous waste generated throughout the construction works however if generated, on site storage of any hazardous wastes produced (i.e., waste fuels/chemicals) will be kept to a minimum, with compliant removal off-site organised on a regular basis. Offsite removal of hazardous waste will be undertaken in accordance with the OCEMP, relevant waste management legislation, by an authorised contractor and sent to the appropriately authorised (licensed/permitted) receiving waste treatment facilities. As only authorised facilities will be used, the potential impacts at any authorised receiving facility sites will have been adequately assessed and mitigated as part of the statutory consent procedures.

Waste will also be generated from construction workers e.g., organic/food waste, dry mixed recyclables (wastepaper, newspaper, plastic bottles, packaging, aluminium cans, tins, and cartons), mixed non-recyclables and potentially sewage sludge from temporary welfare facilities provided on site during the Construction Phase. Waste printer/toner cartridges, waste electrical and electronic equipment (WEEE) and waste batteries may also be generated infrequently from site offices. Office and canteen waste, including food waste, will be stored in wheelie bins on site and it will be collected by an appropriately authorised waste collector. All wastes generated on site will be sent for recycling, recovery, or disposal to a suitably licensed or permitted waste facility.

The Contractor will be required to produce a CWMP for approval by Louth County Council prior to commencing the Works. The Contractor shall refer to and expand on this Construction Waste Management Plan contained within the Outline CEMP prepared by DOBA (2025) and shall include but not be limited to the following: -

- Description of the Project and details of the Contractor's Construction Waste Manager;
- Construction Waste Arising and proposals for waste minimisation, reuse and recycling;
- Procedures for waste prevention and management;
- Estimated costs of waste management;
- Training & education proposals for the workforce regarding C&D Waste procedures;
- Waste collection & disposal including licensing, permits and associated records; and
- CWMP Auditing.

The potential impact from the Construction Phase on waste recovery and disposal is likely to be negative, short-term and slight in nature, which is overall ***not significant***.

8.8.2 Operational Phase

The Operational Phase of the proposed development will result in an increase in the production of municipal waste in the region and will increase demand on waste collectors and treatment facilities, however, as the surrounding area is highly residential in nature, waste collection is commonplace.

An Operational Waste Management Plan (OWMP) has been prepared for the proposed development by DOBA (2025). The OWMP aims to provide a strategy for the handling, storage collection, and transportation of waste generated from the site. This OWMP shall provide guidance on the collection and transportation of waste that is considered appropriate in order to prevent issues associated with litter or other pollution.

The European Waste Catalogue and Hazardous Waste list were published by the European Commission in 1994. Several years later in 2002, the EPA published a condensed version of these original two documents entitled the 'European Waste Catalogue and Hazardous Waste List'. From June 2015, this document was replaced by the EPA_ 'Waste Classification- List of Waste & Determining if Waste is Hazardous or Non- Hazardous'.

Different types of waste are defined by a code under the classification system. The list of Waste (LoW) code for typical municipal waste expected to be generated during the operation of the proposed development are provided in Table 8-4.

Table 8-4 Typical Waste Types and Generated List of Waste (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
Green Waste	20.01.33-34
Waste Electrical and Electronic Equipment (WEEE)	20.01.35-36
Chemicals (solvents pesticides, paints and adhesives, detergents etc.)	17 04
Bulky Waste	17 04 01

Residents shall be required to separate waste into the following main waste streams:

- Mixed Non- Recyclables (MNR);
- Dry Mixed Recyclables (DMR) – including cardboard, plastic packaging, aluminium cans, tins, paper, and Tetra Pak cartons; and
- Organic (food) Waste (OW).

Each bin shall be labelled clearly and shall be colour coded to avoid cross-contamination. The types of waste permitted in each bin shall be clearly posted within the bin store above the bins. Restricted access shall be given to the bin store with only residents of the proposed development permitted access via a code/ electronic fob. Infrequently generated waste such as textiles/ furniture / WEEE shall be stored on a temporary basis within the resident's unit and dispose of them appropriately.

A number of private waste collection contractors service the area of Haggardstown, Co. Louth. A waste collection contractor must be in possession of a collection permit for the type of waste being collected. Collected waste from the proposed development must be transported to a registered/ licensed facility only. Staggered collection times for waste is recommended throughout the day/ week to reduce the number of bins emptied at any given time, along with reducing the time a waste collection vehicle shall be on site.

The waste strategy is presented in the OWMP considers all legal requirements, policies, and best practice guidelines. The plan also demonstrates that the waste storage area has been incorporated within the design of the development. Implementing this OWMP plan shall ensure a high level of recycling, reuse, and recovery at the proposed development during its Operational Phase. All materials that are considered recyclable shall be segregated and separated at source to reduce costs from the waste contractor and ensure maximum diversion of material from landfill. The waste strategy presented in the OWMP shall 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.

The capacity of waste collection companies and waste management facilities in County Louth have been designed with forward planning and expansion in mind to cater for a growing population. It is necessary that all the developments provide the infrastructure and services to assist residents to segregate domestic waste at source, in order to reduce the generation and disposal of non-recyclable mixed waste. Existing waste collections currently take place in the local area and during the Operational Phase, the proposed development will be added to an existing collection route.

The potential impact from the Operational Phase on municipal waste disposal is likely to be long-term, negative, direct and slight in nature, which is overall ***not significant***.

8.8.3 Cumulative Effects

Cumulative Impacts can be defined as "*impacts that result from incremental changes caused by other past, present or reasonably foreseeable actions together with the project*". Effects which are caused by the interaction of effects, or by associated or off-site projects, are classed as indirect effects. Cumulative effects are often indirect, arising from the accumulation of different effects that are individually minor.

A review of other off-site developments was completed as part of this assessment. Chapter 1 of this EIAR details the planning permissions on record in the area, a review of these planning permissions has been completed as part of this assessment.

With regard to the other developments under construction and permitted in the vicinity of the site of the proposed development, there will be a greater demand on existing local waste management services and on regional waste acceptance facilities.

The capacity of waste collection companies and waste management facilities in County Louth have been designed with forward planning and expansion in mind to cater for a growing population. It is necessary that all the developments provide the infrastructure and services to assist residents to segregate domestic waste at source, in order to reduce the generation and disposal of non-recyclable mixed waste. Existing waste collections currently take place in the local area and during the Operational Phase, the proposed development will be added to an existing collection route. The likely effect will be neutral and not significant on waste management facilities in the area in the long term.

8.8.4 Summary

The following Table summarises the identified likely significant effects during the Construction Phase of the proposed development before mitigation measures are applied.

Table 8-5 Summary of Construction Phase Likely Significant Effects in the absence of mitigation

Likely Significant Effect	Quality	Significance	Extent	Probability	Duration	Type
Generation of construction waste and additional demand on surrounding waste collection facilities	Negative	Slight	Local area	Likely	Short-term	Direct

The following Table summarises the identified likely significant effects during the Operational Phase of the proposed development before mitigation measures are applied.

Table 8-6 Summary of Operational Phase Likely Significant Effects in the absence of mitigation

Likely Significant Effect	Quality	Significance	Extent	Probability	Duration	Type
Generation of operational waste and additional demand on surrounding waste collection facilities	Negative	Slight	Local Area	Likely	Long-term	Direct

8.9 Mitigation Measures

8.9.1 Incorporated Design Mitigation

The following measures have been incorporated into the design:

- Buildings have been designed with material efficiency in mind. This will reduce the amount of materials used in the building fabric and minimising the waste during construction;
- Measures to achieve on-site and off-site reuse and recycling of waste have been identified; and
- Dedicated, secure waste segregation areas have been selected for the duration of the enabling works. The dedicated waste storage areas within the waste segregation points will house all bins and skips for the storage of segregated construction waste generated. All containers will be marked with clear signage which will identify which waste types are to be placed into each container.

8.9.2 Construction and Demolition Phase Mitigation

The waste management objective will be to prevent waste arising in the first place, and to re-use, recycle or recover waste materials where possible. The following mitigation measures will be

implemented for the Construction and Demolition Phase of the proposed development regarding waste management:

- Waste materials will be separated at source and will follow the Construction Waste Management Plan (CWMP) contained within the Outline CEMP (DOBA, 2025) and Contractor(s) Construction Environmental Management Plan (CEMP);
- Prior to the commencement of the Construction Phase detailed calculations of the quantities of topsoil, subsoil and green waste will be prepared, and soils will be tested to confirm they are clean, inert or non-hazardous;
- A policy of 'as needed' ordering and strict purchasing procedures will be implemented to prevent waste arisings as far as possible;
- The Contractor will vet the source of aggregate, fill material and topsoil imported to the site in order to ensure that it is of a reputable origin and that it is "clean" (i.e., it will not contaminate the environment).
- The Contractor and/or Council will implement procurement procedures to ensure that aggregate, fill material and topsoil are acquired from reputable sources with suitable environmental management systems as well as regulatory and legal compliance;
- The waste materials generated during the Construction Phase will be stored in suitably size receptables and transferred offsite for appropriate processing, recycling and recovery;
- Waste materials generated from the Construction Phase that are unsuitable for reuse or recovery will be separately collected;
- Disposal of construction generated wastes will be a last resort and only after recycling or recovery options have been ruled out;
- A suitably competent and fully permitted waste management company will be employed to manage waste arising for the Construction Phase. The appointed waste contractor must have the relevant authorisations for the collection and transport of waste materials, issued by the National Waste Collection Permit Office (NWCPO);
- All waste materials will be transported to an appropriately authorised facility, which must have the relevant authorisations for the acceptance and treatment of the specific waste streams, i.e., a Certificate of Registration (COR) or a Waste Facility Permit (WFP) as granted by a Local Authority, or a Waste/Industrial Emission Licence as granted by the Environmental Protection Agency;
- It is not envisaged that there will be any hazardous waste generated throughout the construction works however, in the event that hazardous soil, or historically deposited waste is encountered during the site bulk excavation phase, the contractor will notify Louth County Council and provide a Hazardous / Contaminated Soil Management Plan, to include estimated tonnages, description of location, any relevant mitigation, destination for disposal/treatment, in addition to information on the authorised waste collector(s). Only authorised facilities will be used and as a result of this. The potential impacts at any authorised receiving facility sites will have been adequately assessed and mitigated as part of the statutory consent procedures;
- Waste generated by construction workers will be stored in wheelie bins on site and it will be collected by an appropriately authorised waste collector. All wastes generated on site will be sent for recycling, recovery, or disposal to a suitably licensed or permitted waste facility; and

- All waste quantities and types will be recorded and quantified, and records will be retained onsite for the duration of the Construction Phase.

These mitigation measures will ensure that the waste arising from the Construction Phase of the proposed development is dealt with in compliance with provisions of the Waste Management Act 1996, as amended, associated Regulations and Litter Pollution Act 1997, and The National Waste Management Plan for a Circular Economy 2024-2030. The mitigation measures will also ensure optimum levels of waste reduction, reuse, recycling and recover are achieved and will promote more sustainable consumption of resources.

Furthermore, the Contractor shall, prior to the commencement of the works, nominate and appointan adequately trained Construction Waste Manager (CWM) with overall responsibility for implementation of the CWMP contained within the Outline CEMP. The Contractor's CWM shall be responsible for the following: -

- Instructing all site personnel to comply with the specific provisions of the CWMP, in particular the Objectives regarding the prevention, reduction, re-use and recycling.
- Ensuring that copies of the CWMP will be made available to all relevant personnel on site.
- Informing through regular training of all site personnel of the objectives of the plan and their responsibilities in relation to compliance with the plan.
- Ensuring that where training is required regarding the handling and management of Wastes on site that this is provided to staff as required to ensure they can: -
    - Distinguish reusable materials from materials suitable for recycling
    - Ensure maximum segregation at source
    - Co-operate with the Contractor's management regarding stockpiling of reusable material and ensure separation of materials for recovery
    - Identify and liaise with operates of recovery outlets
- Informing Contractor staff and Sub-Contractors of content of the plan and for maintaining and keeping detailed records.

In addition, an appropriate staff member from each Sub-Contractor on the site shall be assigned the direct responsibility to ensure that the discrete operations stated in the CWMP are performed on an on-going basis. In the event of the CWM leaving the project team, the Contractor will nominate a suitable replacement.

In terms of invasive species, the following measures will be adhered to, to avoid the introduction or dissemination of invasive species to and from the site.

- The contractor will prepare a project specific Invasive Alien Plant Species (IAPS) standard operating procedure document, in advance of work commencement. The document will be prepared by an IAPS specialist and will cover the bio-security measures to be taken, including the maintenance of records, to screen for the introduction of IAPS on-site, and to enable their

tracing if such an introduction occurs; and to ensure no transmission of IAPS offsite. The measures include:

- Validation that all machinery / vehicles are free of IAPS, prior to their first introduction to site;
- Certification from the suppliers that all imported soils and other fill/landscaping materials are free of IAPS;
- A regular schedule of site inspections across the IAPS growing seasons, for the duration of the construction works programme;
- Validation that all machinery / vehicles are free of IAPS, prior to leaving the site; and
- Appropriate and effective site biosecurity hygiene to ensure that no IAPS are transmitted off-site for the duration of the proposed works.

8.9.3 Operational Phase Mitigation

An Operational Waste Management Plan has been prepared by DOBA (2025) for the proposed development. A waste strategy is presented in the OWMP which considers legal requirements, policies, and best management guidelines. This plan also demonstrates that the Waste Storage Area (WSA) has been incorporated within the design of the proposed development. Implementation of the OWMP will ensure a high level of recycling, reuse, and recover at the proposed development during the Operational Phase. All materials that are considered recyclable will be segregated and separated at source to reduce costs from the waste collector and ensure maximum diversion of material from landfill. The waste strategy presented in the OWMP will provide sufficient storage capacity for the estimated quantity of segregated waste. The designated WSA will provide sufficient room for the required receptacles in accordance with the details of this strategy.

Residents will be required to separate waste into the main following streams and place the same in bins provided:

- MNR (mixed non-recyclables);
- DMR (dry-mixed recyclables); and
- OW (organic waste).

Each bin will be labelled clearly and will be colour coded to avoid cross-contamination. The types of wastes permitted in each bin will be clearly posted within the bin store above the bins. Restricted access will be given to the bin store with only residents of the proposed development permitted access via a code/electronic fob. Infrequently generated waste such as textiles/furniture/WEEE will be stored on a temporary basis within the resident's unit and disposed of appropriately.

As outlined in the OWMP, it is intended to ensure that the highest possible levels of waste reduction, waste reuse and waste recycling are achieved for the proposed development. Specifically, the OWMP will aim to achieve waste prevention, maximum recycling and recovery of waste with a focus on diversion of waste from landfill wherever possible. The management company will be responsible for the provision of a leaflet to all new tenants encouraging good waste segregation and pictorial information detailing the waste streams that can be placed in each bin. In addition to this, clauses that support waste segregation targets will be included in relevant legal documentation e.g., tenancy agreements where possible. The OWMP also states that the facilities management company must

employ suitably permitted or 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.

The OWMP has reviewed policy alongside best practice guidance and recommendations for sustainable waste and recycling management arrangements for the proposed development and ensures a high level of recycling, reuse and recovery at the development and also ensures that waste management is carried out in accordance with the requirements of the Louth County Council Development Plan 2021-2027 and Ireland's National Waste Policy.

8.10 Residual Impact Assessment

This section assesses potential significant environmental impacts which remain after mitigation measures are implemented.

8.10.1 Construction and Demolition Phase

The residual effects on waste management are considered slight, neutral, direct and short-term, i.e., overall ***not significant,*** this is due to:

- The prevention and mitigation measures proposed within this and other chapters of the EIAR;
- Compliance with national legislation and the allocation of adequate time and resources dedicated to efficient waste management practices; and
- Continued use of permitted/licensed waste hauliers and facilities. Waste removed from the facility will be managed appropriately and will avoid environmental impacts or pollution. In addition, the correct management and storage of waste will avoid litter or pollution issues at the site.

8.10.2 Operational Phase

Waste materials will be generated on an ongoing basis during the Operational Phase; these will for the most part consist of municipal waste and recyclable materials. Careful management of these, including segregation at source, will help to ensure a high level of waste recycling, reuse, and recovery at the development. Given the provision of appropriate facilities, and their correct use by residents, environmental impacts (e.g. litter, contamination of soil or water, etc.) arising from operational waste storage and removal are expected to be minimal. The use of suitably licensed waste contractors will ensure compliance with relevant legal requirements and appropriate off-site management of waste. With the implementation of the proposed operational waste management measures, the proposed development is not expected to have a significant environmental impact with respect to operational waste. The likely effect of the Operational Phase on waste management will be neutral, direct and slight in the long-term, which is overall ***not significant***.

8.10.3 Summary of Post-mitigation Effects

The following Table summarises the identified likely significant residual effects during the Construction Phase of the proposed development following the application of mitigation measures.

Table 8-7 Summary of Construction Phase Effects Post Mitigation

Likely Significant Effect	Quality	Significance	Extent	Probability	Duration	Type
Generation of construction waste and additional demand on surrounding waste collection facilities	Neutral	Slight	Local area	Likely	Short-term	Direct

The following Table summarises the identified likely residual significant effects during the Operational Phase of the proposed development post mitigation.

Table 8-8 Summary of Operational Phase Effects Post Mitigation

Likely Significant Effect	Quality	Significance	Extent	Probability	Duration	Type
Generation of operational waste and additional demand on surrounding waste collection facilities	Neutral	Slight	Local area	Likely	Long-term	Direct

8.10.4 Cumulative Residual Effects

The capacity of waste collection companies and waste management facilities in County Louth have been designed with forward planning and expansion in mind to cater for a growing population. It is necessary that all the developments provide the infrastructure and services to assist residents to segregate domestic waste at source, in order to reduce the generation and disposal of non-recyclable mixed waste. Existing waste collections currently take place in the local area and during the Operational Phase, the proposed development will be added to an existing collection route. The likely effect will be neutral and not significant on waste management facilities in the area in the long term.

8.11 Risk of Major Accidents or Disasters

Not relevant to waste management.

8.12 Worst Case Scenario

A worst-case scenario would be where a previously unclassified hazardous waste stream arose on the site during excavations, which was not identified and segregated appropriately and resulted in the contamination of a non-hazardous waste stream, such as soil and stones, resulting in a large volume of hazardous waste that would require specialist removal and treatment. Additionally, the contaminated soil and stones would no longer be fit for use for fill and landscaping and would need to be replaced with imported materials.

8.13 Interactions

Interactions are dealt with in Chapter 16 of this EIAR.

8.14 Monitoring

8.14.1 Construction and Demolition Phase

The site control measures to manage and minimise waste include:

- Signage on the site office/welfare bins to separate them as environmental/domestic waste bins; and
- Briefing for all sub-contractors via induction handouts.

Regular waste audits will be carried out in accordance with the Contractor's Project Specific Waste Audit Plan which shall be a systematic study of the waste management practices applied in the project to highlight the problems that Waste can cause and the benefits of prevention and minimisation. The audits shall allow the Contractor to monitor the quantity and type of waste produced by different Sub-Contractors and identify opportunities for Waste reduction throughout each stage of the project. The Audit should identify details of raw material inputs and the quantity, type and composition of all Waste from the site. The Contractor will record the quantity in tonnes and types of Waste and materials leaving the site during the works. The name, address and authorisation details of all facilities and locations to which waste and materials are delivered will be recorded along with the quantity of Waste in tonnes delivered to each facility. Records will show material which is recovered and disposed of. The Audit shall highlight corrective actions that may be taken in relation to management policies or site practice in order to bring about further waste reductions which shall be supplemented with a tracking system to determine the success or failure of the corrective actions. Finally, summary audit reports outlining types, quantities of Waste arising's and their final treatment method should be sent to the relevant Authority for their information.

8.14.2 Operational Phase

The building management company and future residents will be required to maintain the bins and storage areas in good condition. The waste strategy presented in the OWMP 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.

8.15 Conclusion

The implementation of the mitigation measures outlined in Section 8.9 will ensure that high rates of reuse, recovery and recycling are achieved at the site during the Construction and Operational Phases. It will also ensure that European, National and Regional legislative waste requirements with regard to waste are met and that associated targets for management of waste are achieved.

The residual effects on waste management are considered to be considered slight, neutral, direct and short-term for the Construction Phase, which is overall not significant and neutral, direct and slight in the long-term for the Operational Phase, which is overall not significant.

8.16 References and Sources

- Department of Communications, Climate Action and Environment (DCCAE) (2021) A Waste Action Plan for a Circular Economy – Ireland's National Waste Policy 2020-2025
- Environmental Protection Agency, 2022, Guidelines on the Information to Be Contained in Environmental Impact Assessment Reports.
- Environmental Protection Agency, 2021, Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for Construction and Demolition Projects
- Environmental Protection Agency, 2019, Guidance on Soil and Stone By-products in the context of article 27 of the European Communities (Waste Directive) Regulations 2011, Version 3.
- Environmental Protection Agency, 2003, Advice Notes on Current Practice in the preparation of Environmental Impact Statements.
- Environmental Protection Agency, 2002, Guidelines on the information to be contained in Environmental Impact Statements.
- Litter Pollution Act 1997.
- Local Government Ireland (2024) The National Waste Management Plan for a Circular Economy 2024-2030.
- Louth County Development Plan 2021-2027.
- Operational Waste Management Plan, Donnachadh O'Brien & Associates Consulting Engineers, 2025.
- Outline Construction Environmental Management Plan, Donnachadh O'Brien & Associates Consulting Engineers, 2025.
- Waste Framework Directive (Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste) as amended by Directive (EU) 2018/851.
- Waste Management Acts 1996-2011 (as amended).