

**EIAR Addendum Report in relation to a Large-Scale Residential Development (LRD) Planning Application at Balbriggan, Co. Dublin**



**09<sup>th</sup> March 2026**

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**On behalf of:** Glenveagh Homes Ltd.

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## Introduction

The following Environmental Impact Assessment Report (EIAR) Addendum Report has been prepared by Altamar Ltd. on behalf of Glenveagh Homes Ltd. in response to a Request for Additional Information received from Fingal County Council (FCC) on the 20<sup>th</sup> February 2026 (PF/051/26) relating to a proposed Large-Scale Residential Development (LRD) application (Reg. Ref. LRD0069/S3E) at Balbriggan, Co. Dublin. Specifically, this Report focuses on Chapter 4: Biodiversity of the EIAR submitted as part of the planning application (Reg. Ref. LRD0069/S3E).

The purpose of this Addendum Report is to address Items 2(a)[i]-[ix] of the Request for Additional Information (PF/051/26) relating to Chapter 4: Biodiversity of the EIAR.

## Description of the Proposed Project

The development will consist of the construction of 815 no. dwellings (610 no. houses, 194 apartments & 11 no. later living dwellings), a portion of the C-Ring Road, open space, community building/retail floorspace and 2 no. creches as follows:

- A) Demolition of existing single storey dwelling (c. 154 sq. m) and agricultural outbuilding (c. 366 sq. m) located to the south of Flemington Lane;
- B) Provision of portion of 'C-Ring Road' from Flemington Lane [to include junctions and ancillary footpaths, cycle paths, lighting, bus stops, boundary wall to adjoining owner, and tie in to existing roads/agricultural access points] to link into the existing R122 roundabout with vehicular access also from the Boulevard Road, Hamlet Lane, & Flemington Lane along with associated amendments to the layout of the Local Road L1130 (also known as the Clonard Road including the creation of a cul de sac arrangement to the south of the C-Ring Road); the provision of car parking spaces (1,037 no.), bicycle parking spaces (1,144 no.) and all internal roads and footpaths and bicycle and bin stores, & substations;
- C) Provision of a community pavilion (2 storeys) comprising community floorspace of c. 730 sq. m (with flexible internal spaces) along with a retail unit (c. 419 sq. m) at ground floor of apartment Block F as well as 2 no. 2 storey creches c. 530 sq. m each with ancillary parking and open space areas;
- D) 610 no. terraced, semi-detached & detached houses comprising 318 no. 2-bedroom houses (2 storey), 254 no. 3-bedroom houses (2 storey) and 38 no. 4-bedroom houses [house types B1/F4/F5 with variants] 3 storeys;
- E) 194 no. apartments in 5 no. apartment buildings (52 no. studio apartments, 87 no. 1 bedroom apartments, 51 no. 2 bedroom apartments and 4 no. 3 bedroom apartments - all apartments with terrace or balcony on elevations) as follows: Block A [4 storeys & 64 no. apartments] comprising 47 no. 1 bedroom apartments and 17 no. 2 bedroom apartments; Block C, [Part 3-4 storeys & 18 no. apartments] comprising 10 no. 1 bedroom apartments, 6 no. 2 bedroom apartments & 2 no. 3 bedroom apartments; Block F [Part 4-5 storeys & 48 no. apartments] comprising 36 no. 1 bedroom apartments and 12 no. 2 bedroom apartments; Block G [Part 3-4 storeys & 40 no. apartments]; comprising 30 no. 1 bedroom apartments and 10 no. 2 bedroom apartments; Block H [part 3-4 storeys & 24 no. apartments] comprising 16 no. 1 bedroom apartments, 6 no. 2 bedroom apartments & 2 no. 3 bedroom apartments;
- F) 11 no. single storey 2 bedroom later living houses with associated communal open space;
- G) 5.26 hectares of open space comprising Class 1 Open Space (c. 2.39 hectares in the western separate parcel of land), Public open space c.2.87 hectares, hard and soft landscaping (including public lighting & boundary treatment, ESB substations, bicycle and bin stores) and communal/semi-private open space for the proposed apartment units;

- H) Provision of surface water attenuation measures, connection to water supply, provision of foul drainage infrastructure (and Uisce Eireann diversion) to Uisce Eireann specifications and all ancillary site development, construction, and landscaping works including reprofiling of the site where required;
- I) The proposals will replace the previously permitted LRD under planning ref. LRD0006/S3 & ACP Ref: 319343-24.

The proposed site outline, site location, and site layout plan are demonstrated in Figure 1.



**Figure 1.** Proposed site outline and location

## Items Relating to Ch.4: Biodiversity

The Request for Additional Information received from Fingal County Council (FCC) on the 20<sup>th</sup> February 2026 (PF/051/26) specifically references Ch.4: Biodiversity of the submitted EIAR in the following items:

*'2. The findings and conclusions of the Environmental Impact Assessment Report have been reviewed by the Planning Authority. Insufficient information is provided in relation to several key areas to enable a full and complete assessment and to reach a reasoned conclusion that the development would not result, either directly or indirectly in likely significant effects on the environment. The applicant is required to submit an updated EIAR which addresses the following identified deficiencies:*

*(a) The information submitted as part of Chapter 4 of the EIAR is considered insufficient and the applicant is required to submit a revised chapter which includes the following:*

- i. Further details as to how the site has achieved a biodiversity net gain. This should include both a quantitative and qualitative assessment and reference to good practice principles and guidance such as those set out by CIEEM.*
- ii. Further details to demonstrate how the proposed lighting design will avoid unintended illumination on key habitats and ecological corridors. Details on the colour, tilt, height, operational hours, cowles or other methods for protecting biodiversity features are required within the chapter.*
- iii. The chapter refers to dated guidance from 2010 and out of date Bat Conservation Trust guidance; and no reference has been made to the DoHLGH's Bat Mitigation Guidelines for Ireland (2022) or the Institute of Lighting Professionals and Bat Conservation Trust Guidance on Bats and Artificial Lighting at Night (Guidance Note 08/23). This should be addressed within the chapter.*
- iv. Further details regarding the potential usage of the site and surrounding area by reptile and amphibians. Any survey must include all potential surface water features, including the open well to the north of the site, and the drainage ditches/tributary of the Bremore stream which runs along the northern boundary of the site. All drainage ditches and surface water features must be fully accounted for and assessed in the EIAR.*
- v. Further details to demonstrate how the proposed development provides adequate resources for the red and amber listed bird species recorded on site and how existing features have been protected and enhanced. This includes food resources and habitats used for foraging, resting, commuting and breeding.*
- vi. Further details on how commuting and foraging corridors through the landscape have been protected and enhanced, including north to south and east to west. Maintenance and development of a wide base of ground layers for hedgerows and treelines are recommended to ensure wildlife can actively use these corridors as intended. This includes hedgerows, treelines and other linear features, including watercourses and the riparian zone.*
- vii. Tree removal plans from EIAR Appendix I Arboricultural Report are missing. This is required to be provided in order for a robust assessment to be made on the hedgerows and trees that will be lost to the proposed development.*
- viii. A large proportion of the proposed planting scheme includes non-native species. The proposed planting scheme should be revised to include native species only.*
- ix. In order to fully assess bat survey efforts, details on the start and end time of surveys, weather conditions, routes of transects and trees surveyed are required.'*

## Altamar Responses

The following Responses have been prepared by Altamar to provide clarification on the Items outlined in the Request for Additional Information submitted by FCC.

### Item 2(a)[i]

*‘Further details as to how the site has achieved a biodiversity net gain. This should include both a quantitative and qualitative assessment and reference to good practice principles and guidance such as those set out by CIEEM.’*

**Altamar Response** The Biodiversity Chapter outlines a quantitative measurement to support the claim that a Net Gain for trees and hedgerows will be achieved onsite as per the landscape plan. This has been calculated following consultation with ParkHood Landscape Architects and involved detailed discussions with Altamar to ensure that any hedgerow / tree loss was offset by compensatory planting to an extent that a net positive length of linear vegetative features will be implemented onsite. It should be noted that the Biodiversity Chapter does not suggest the site has achieved an overall site net gain in biodiversity. Rather, the quantitative assessment included in the original Biodiversity Chapter relates solely to linear vegetative features (hedgerows and tree).

Biodiversity enhancement measures have been implemented throughout the site in line with CIEEM best practice principles for Biodiversity Net Gain (BNG). In the absence of formal legislation, policy, or comprehensive quantitative BNG measurement tool specific to the Irish context, CIEEM’s briefing paper “Biodiversity Net Gain in Ireland” (2024) emphasises that CIRIA’s (2019) “Good Practice Guidance” document should be the main reference text for all BNG assessments. Although not referenced explicitly in the original Biodiversity Chapter (see revised Sections 4.2 & 4.15), best practice principles in line with CIRIA (2019) guidelines was adhered to during the ecological assessment and Design Stage of the proposed development. The mitigation hierarchy (avoidance, minimisation, compensation), described as the “cornerstone of achieving BNG” (CIRIA, 2019), was applied at all stages of assessment and design to ensure that, where feasible, ecologically valuable habitats were retained and enhanced onsite. Impacts on key ecological corridors within the site were avoided as much as possible (see retained hedgerows along northern boundary), minimised (e.g. lightspill protection to prevent lighting impacts on retained hedgerows in centre of site), and compensated (measurable net-positive tree and hedgerow planting). This is further evidenced by Glenveagh Homes Ltd.’s internal sustainability strategy which influenced the design of the proposed development.

In Response to Item 2(a)[i], the following additional information (see revised Section 4.9.2) has been provided:

Table 4.6. Biodiversity Net Gain Measures Considered: Hedgerow and Trees

Site Context	Qualitative Assessment	Quantitative Assessment
<p><b>Baseline</b></p>	<p>Hedgerows were noted within the site on the field boundaries. Hedgerows dissect the site west-east and north-south, although it should be noted that a number of onsite hedgerows are partially segregated by dissecting tracks, roads, and existing residential developments.</p> <p>Hedgerows varied significantly in their condition and have been unmanaged for several years. Proximate to the building to the north of the site a cluster of semi mature ash (<i>Fraxinus excelsior</i>) (with ash dieback noted) formed the field boundaries. The remainder of the site had more traditional hedgerows. However, the condition varied considerably from linear mature traditional hedgerow to fractured hedgerow dominated by bramble. Species including elder (<i>Sambucus nigra</i>), blackthorn (<i>Prunus spinosa</i>), hawthorn (<i>Crataegus monogyna</i>), holly (<i>Ilex aquifolium</i>), common fumitory (<i>Fumaria officinalis</i>), dog-rose (<i>Rosa canina</i>), bramble (<i>Rubus fruticosus agg.</i>), hedge bindweed (<i>Calystegia sepium</i>), cleavers (<i>Galium aparine</i>), willow (<i>Salix sp.</i>), gorse (<i>Ulex europaeus</i>), sycamore (<i>Acer pseudoplatanus</i>), ash (<i>Fraxinus excelsior</i>), ivy (<i>Hedera helix</i>) and cleavers (<i>Galium aparine</i>) were noted.</p> <p>Hedgerows onsite supported a number of breeding birds onsite, including the Red Listed Yellowhammer and Amber Listed House Sparrow, Linnets, and Starling. Breeding activity typically concentrated to higher quality hedgerows located within the centre of the site.</p> <p>No resting or breeding places of any non-volant mammalian species were recorded within / proximate to any onsite hedgerow. A single instance of an Irish Stoat (<i>Mustela erminea Hibernica</i>) transiting along a hedgerow located immediately west of the site boundary was recorded by a camera trap.</p> <p>Recorded bat foraging activity along onsite hedgerows was relatively low, with activity concentrated along the northern boundary proximate to the derelict structures.</p>	<p>Overall, the site extends to 24.94ha in size. Of this, a total length of 2,546 linear metres of hedgerows are located onsite.</p>
<p><b>Post-Development</b></p>	<p>The mitigation hierarchy was applied during the Design Stage of the proposed development. Avoidance and Minimisation was applied to the most valuable hedgerows onsite. As a result, hedgerows within the centre of the site (east-west &amp; north-south ecological corridors) and north of the site (east-west ecological corridors) will be retained. This includes hedgerows confirmed to support Yellowhammer (Red-Listed), Linnets (Amber Listed), and Starling (Amber Listed) breeding activity. Impacts on these hedgerows will be minimised through the proposed lighting design (including backspill protection) and landscape plan (including base layer buffer habitats along hedgerow fringes). Further, these hedgerows will be enhanced through increased native tree and hedge planting.</p> <p>Increased hedgerow and tree planting onsite will compensate hedgerow loss to facilitate the proposed development. New planting will be located within the centre and along the fringes of the site to provide opportunities for local biodiversity to utilise, and commute through, the site.</p>	<p>The proposed development will retain and enhance 907 linear metres of hedgerows onsite.</p> <p>In total, the proposed quantities of this habitat will be removed:</p> <ul style="list-style-type: none"> <li>- 34no. trees removed</li> <li>- 1,639 linear metres of hedgerow removed</li> </ul> <p>As a compensatory measure, the proposed planting plan will include the following</p> <ul style="list-style-type: none"> <li>- 466 no. trees will be planted (+10% net gain in trees)</li> <li>- 2,068 linear metres of new hedgerows will be planted (+10% net gain in hedgerows)</li> </ul>

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**Item 2(a)[ii]** *'Further details to demonstrate how the proposed lighting design will avoid unintended illumination on key habitats and ecological corridors. Details on the colour, tilt, height, operational hours, cowles or other methods for protecting biodiversity features are required within the chapter.'*

**Altamar Response** Section 4.5.2 has been revised to include the following:

'Lighting Design

*ENX Engineering Consultants outline that the current lighting layout has been designed to Fingal County Council lighting specifications, incorporating the following:*

- *0 degree tilt.*
- *Minimum 6 meter high columns within the estate and the main spine road to 8 meter high columns.*
- *Lighting on the main spine road is natural white 4000K.*
- *Lighting within the estate is proposed at 3000K warm with white fittings.*
- *Lighting designed to a lighting class of P4 (EN13201) with a step back to Lighting class P5 after 12 O'Clock midnight.*
- *Cowels will be provided on lights backing onto ecological corridors and public open spaces.*

*The above lighting design, along with mitigation measures outlined in Section 4.8, will ensure the proposed lighting design will not have a significant impact on local biodiversity. It is important to note that backspill protection has been proposed on lights that could potentially impact on biodiversity features and that the lightspill software utilised to prepare the lighting plan does not have the ability to show the reduced spill as a result of the back spill protection. Therefore, the "worst-case scenario" of light spill is demonstrated in lighting drawings and is an over-estimation. See Appendix 4.1 for further details.'*

**Item 2(a)[iii]** *'The chapter refers to dated guidance from 2010 and out of date Bat Conservation Trust guidance; and no reference has been made to the DoHLGH's Bat Mitigation Guidelines for Ireland (2022) or the Institute of Lighting Professionals and Bat Conservation Trust Guidance on Bats and Artificial Lighting at Night (Guidance Note 08/23). This should be addressed within the chapter.'*

**Altamar Response** The most recent Irish guidelines are standards for Altamar and were utilised as part of Altamar's initial assessment of the proposed development in relation to bats. This is evidenced in the reference to the DoHLGH's Bat Mitigation Guidelines for Ireland (2022) in Section 4.2 "Study Methodology" and Appendix 4.1 Bat Fauna Assessment, which informed the Biodiversity Chapter. For the purposes of clarity, text in Section 4.6.2, Section 4.15, and Appendix 4.1 (below) has been revised to amend this clerical error. However, as outlined above, the most recent Irish guidelines were utilised as part of

Altemar's initial assessment of the proposed development in relation to bats. As a result, revisions to text in Section 4.6.2, Section 4.15, and Appendix 4.1 do not constitute a material change to the assessment, findings, or validity of the original EIAR.

Section 4.6.2

*'The public lighting has been designed to comply with bat lighting guidelines (Bat Mitigation Guidelines for Ireland, DoHLGH, 2022) (Guidance Note 08/23 Guidance on Bats and Artificial Lighting at Night (BCT, 2023).'*

Section 4.15

*'33. Marnell, F., Kelleher, C., & Mullen, E. (2022), BAT MITIGATION GUIDELINES FOR IRELAND – V2*

*<https://www.npws.ie/sites/default/files/publications/pdf/IWM134.pdf>*

*34. Guidance Note 08/23 Guidance on Bats and Artificial Lighting at Night (BCT, 2023).'*

Appendix 4.1

*'Institution of Lighting Professionals (2023). Bats and Artificial Lighting at Night. Guidance Note 08/23. Institution of Lighting Professionals and the Bat Conservation Trust.'*

**Item 2(a)[iv]**

*'Further details regarding the potential usage of the site and surrounding area by reptile and amphibians. Any survey must include all potential surface water features, including the open well to the north of the site, and the drainage ditches/tributary of the Bremore stream which runs along the northern boundary of the site. All drainage ditches and surface water features must be fully accounted for and assessed in the EIAR.'*

**Altemar Response**

As detailed in the original Ch.4: Biodiversity:

*'No difficulties were encountered in relation to the preparation of the Biodiversity report.... Flora, amphibian, habitat and mammal assessments were carried out within the optimal survey period.'* (Section 4.2.5)

*'The most recent site assessment was carried out on the 14<sup>th</sup> August 2025. Habitats within the proposed development site were classified according to Fossitt (2000) (Figure 4.10) and the species noted within each habitat are described.'* (Section 4.3.4 – see Figure 2 for Habitat Map).

**'FW4-Drainage ditch**

*A drainage ditch is located along a hedgerow located to the southeast of the subject site (see Figure 4.10). This drainage ditch appears to serve the adjacent agricultural fields to the north and south. Standing water was observed within this habitat, with lady-fern (*Athyrium filix-femina*) growing along its banks'* (Section 4.3.4)

**'Amphibians/Reptiles**

*No amphibian or reptile activity was noted on site.* (Section 4.3.4.1)

As outlined above, the original Ch.4: Biodiversity details any identifiable surface water features recorded onsite, maps these features using Fossitt (2000), outlines their characteristics / species present within these habitats, and ultimately concludes that no reptiles / amphibians were recorded onsite. All surface water features were accounted for in the original Biodiversity Chapter.

For the purposes of clarity, Section 4.3.4 has been revised as follows:

***'FW4-Drainage ditch***

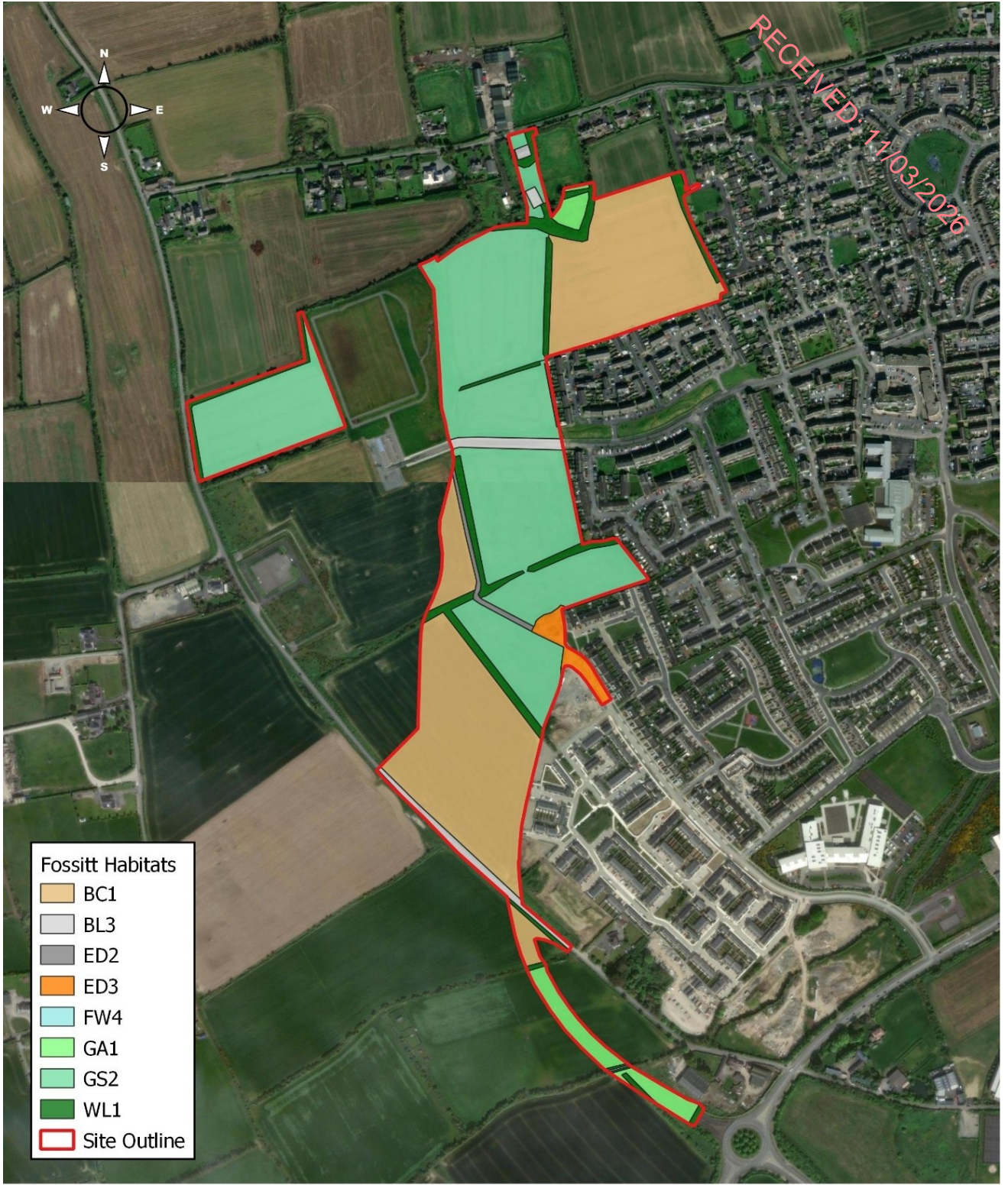
*As detailed in the Hydrology Chapter (see Section 6.3.1), the site is drained by manmade ditches which may convey flow to the east / southeast towards the Clonard Brook Stream, Clogheder Stream and Bremore Stream during periods of heavy rainfall. Further, the Hydrology Chapter indicates that these ditches only serve the subject site and agricultural fields immediately west and do not convey any upstream watercourse.*

*During the site inspections carried out by Altemar, a number of drainage ditches were observed along field boundaries and the base of linear hedgerows. However, no standing or flowing water was observed in any of these habitats. No reptiles / amphibians, or features suitable for reptiles / amphibians, were recorded along these habitats.*

*The only drainage ditch to display standing water during Altemar's site inspections is located to the southeast of the subject site (see Figure 4.10). This drainage ditch appears to serve the adjacent agricultural fields to the north and south. Standing water was observed within this habitat, with lady-fern (*Athyrium filix-femina*) growing along its banks. No reptiles / amphibians were recorded within this surface water feature, however, this habitat is suitable for these species.'*

***'WL1 Hedgerows***

*The historic Spring is known as 'Lady Well' was noted within a hedgerow habitat to the north of the subject site. This feature did not display a surface expression of a well structure (although one could be concealed by overgrowth of vegetation) and did not display any significant surface water discharge to the surrounding environment. No reptiles / amphibians were recorded within this feature.'*



- Fossitt Habitats**
- BC1
  - BL3
  - ED2
  - ED3
  - FW4
  - GA1
  - GS2
  - WL1
  - Site Outline

0 250 500 750 m

Project: Flemington South LRD  
 Location: Balbriggan, Co. Dublin  
 Date: 09/12/2025  
 Drawn By: Jack Doyle (Altamar)



Figure 2. Fossitt Habitats onsite

**Item 2(a)[v]**

*‘Further details to demonstrate how the proposed development provides adequate resources for the red and amber listed bird species recorded on site and how existing features have been protected and enhanced. This includes food resources and habitats used for foraging, resting, commuting and breeding.’*

**Altamar Response**

As detailed in Table 4.4 of the original Ch. 4 Biodiversity, the following red and amber listed bird species were recorded on / immediately adjacent to the site: kestrel, meadow pipit, yellowhammer (red listed species), black-headed gull, brent goose, common gull, greenfinch, herring gull, house sparrow, linnet, skylark, and starling (amber listed). It is important to note that baseline usage of the site by red and amber listed bird species is low, as evidenced by a number of Breeding and Wintering Ornithological surveys undertaken on the site (see Appendices 4.2-4.5). No significant number of red and amber listed bird species were recorded foraging, resting, commuting, or breeding onsite. The following measures have been implemented into the design of the proposed development to retain, and (where necessary) provide compensatory, resources for foraging, resting, commuting, and breeding:

For the purposes of clarity, the following alterations have been made to the Biodiversity Chapter (Section 4.9.2):

*‘Red and Amber Listed Bird Species*

*Table 4.7 details species-specific measures implemented onsite to provide adequate food resources and habitats for foraging, resting, commuting, and breeding specific to Red and Amber listed species recorded onsite.*

Table 0.7: Species-Specific Measures for Red and Amber Listed Bird Species Recorded Onsite

Species	BoCCI Status	Species-Specific Measures
Kestrel	Red	<p><u>Foraging</u> The proposed development will reduce potential hunting grounds for kestrel. This reduction is mitigated by the inclusion of parkland areas throughout the site and maintained degree of ecological connectivity from the site to wider hunting grounds via the retention and enhancement of onsite hedgerows.</p> <p><u>Resting</u> Retention of hedgerows and compensatory planting of trees and hedgerows will provide suitable resting habitats for kestrel onsite.</p> <p><u>Commuting</u> The retention, enhancement, and compensatory planting of onsite hedgerows will maintain commuting corridors for kestrel through the site.</p> <p><u>Breeding</u> The retention, enhancement, and compensatory planting of trees and hedgerows onsite will provide breeding opportunities for kestrel throughout the site, particularly in the isolated western parkland.</p>
Meadow Pipit	Red	<p><u>Foraging</u> The proposed development will reduce overall foraging grounds for meadow pipit. This reduction is mitigated by the inclusion of parkland areas throughout</p>

		<p><i>the site and maintained degree of ecological connectivity from the site to wider foraging grounds via the retention and enhancement of onsite hedgerows. The inclusion of herb-layer buffers along onsite hedgerows and native wildflower / shrub planting throughout the site will provide foraging opportunities for this species onsite.</i></p> <p><u>Resting</u> <i>Retention of hedgerows and compensatory planting of trees and hedgerows will provide suitable resting habitats for meadow pipit onsite.</i></p> <p><u>Commuting</u> <i>The retention, enhancement, and compensatory planting of onsite hedgerows will maintain commuting corridors for meadow pipit through the site.</i></p> <p><u>Breeding</u> <i>The retention, enhancement, and compensatory planting of hedgerows onsite, buffered by native herb / shrub ground layers, will provide breeding opportunities for meadow pipit throughout the site, particularly in the isolated western parkland.</i></p>
Yellowhammer	Red	<p><u>Foraging</u> <i>The proposed development will reduce overall foraging grounds for yellowhammer. This reduction is mitigated by the inclusion of parkland areas throughout the site and maintained degree of ecological connectivity from the site to wider foraging grounds via the retention and enhancement of onsite hedgerows. The inclusion of herb-layer buffers along onsite hedgerows and native wildflower / shrub planting throughout the site will provide foraging opportunities for this species onsite.</i></p> <p><u>Resting</u> <i>Retention of hedgerows and compensatory planting of trees and hedgerows will provide suitable resting habitats for yellowhammer onsite.</i></p> <p><u>Commuting</u> <i>The retention, enhancement, and compensatory planting of onsite hedgerows will maintain commuting corridors for yellowhammer through the site.</i></p> <p><u>Breeding</u> <i>Areas with confirmed Yellowhammer breeding activity (central hedgerow) will be retained and enhanced as part of the proposed development. Increased hedgerow planting will create nesting opportunities for local Yellowhammer populations. Further, the planting plan (incorporating AIPP plants) will create opportunities for invertebrate populations onsite, thereby providing a foodsource for Yellowhammer during the breeding season.</i></p>
Black-headed Gull	Amber	<p><u>Foraging</u> <i>The proposed development will reduce potential foraging grounds for black-headed gull. This species is adaptable to urban environments, and an overall reduction in foraging area is mitigated by the inclusion of parkland areas throughout the site.</i></p> <p><u>Resting</u> <i>Amenity grassland areas and apartment block / residential unit roofs will provide resting opportunities for this species onsite.</i></p> <p><u>Commuting</u> <i>Black-headed gull flightlines were recorded between 10m-100m in height during breeding / wintering ornithological surveys conducted onsite. Flightlines were recorded over the adjacent residential developments east and south of the site.</i></p>

		<p>No impacts on commuting behaviour for this species are foreseen as a result of the proposed development.</p> <p><u>Breeding</u> The development of apartment blocks and residential units will provide nesting opportunities for this species on the roofs of these structures.</p>
Brent Goose	Amber	<p><u>Foraging</u> No Brent Goose foraging activity was recorded onsite. The introduction of amenity grassland parks will provide a minor foraging opportunity for brent geese onsite.</p> <p><u>Resting</u> No Brent Goose resting activity was recorded onsite. The introduction of amenity grassland parks will provide a minor resting opportunity for brent geese onsite.</p> <p><u>Commuting</u> The proposed development will not impact on brent goose commuting activity.</p> <p><u>Breeding</u> Brent geese breed in Canada, Svalbard, and Greenland. No impact on brent goose breeding will occur as a result of the proposed development.</p>
Common Gull	Amber	<p><u>Foraging</u> The proposed development will reduce potential foraging grounds for common gull. This species is adaptable to urban environments, and an overall reduction in foraging area is mitigated by the inclusion of parkland areas throughout the site.</p> <p><u>Resting</u> Amenity grassland areas and apartment block / residential unit roofs will provide resting opportunities for this species onsite.</p> <p><u>Commuting</u> Common gull flightlines were recorded between 10m-20m in height during breeding / wintering ornithological surveys conducted onsite. Flightlines were recorded over the adjacent residential developments east of the site. No impacts on commuting behaviour for this species are foreseen as a result of the proposed development.</p> <p><u>Breeding</u> The development of apartment blocks and residential units will provide nesting opportunities for this species on the roofs of these structures.</p>
Greenfinch	Amber	<p><u>Foraging</u> The proposed development will reduce overall foraging grounds for greenfinch. This reduction is mitigated by the inclusion of parkland areas throughout the site and maintained degree of ecological connectivity from the site to wider foraging grounds via the retention and enhancement of onsite hedgerows. The inclusion of herb-layer buffers along onsite hedgerows and native wildflower / shrub planting throughout the site will provide foraging opportunities for this species onsite.</p> <p><u>Resting</u> Retention of hedgerows and compensatory planting of trees and hedgerows will provide suitable resting habitats for greenfinch onsite.</p> <p><u>Commuting</u> The retention, enhancement, and compensatory planting of onsite hedgerows will maintain commuting corridors for greenfinch through the site.</p> <p><u>Breeding</u></p>

		<p>The retention, enhancement, and compensatory planting of hedgerows onsite, buffered by native herb / shrub ground layers, will provide breeding opportunities for greenfinch throughout the site, particularly in the isolated western parkland. Further, the planting plan (incorporating AIPP plants) will create opportunities for invertebrate populations onsite, thereby providing a foodsource for greenfinch during the breeding season.</p>
Herring Gull	<b>Amber</b>	<p><u>Foraging</u> The proposed development will reduce potential foraging grounds for Herring gull. This species is adaptable to urban environments, and an overall reduction in foraging area is mitigated by the inclusion of parkland areas throughout the site.</p> <p><u>Resting</u> Amenity grassland areas and apartment block / residential unit roofs will provide resting opportunities for this species onsite.</p> <p><u>Commuting</u> Herring gull flightlines were recorded between 10m-200m in height during breeding / wintering ornithological surveys conducted onsite. Flightlines were recorded over the adjacent residential developments east and south of the site. No impacts on commuting behaviour for this species are foreseen as a result of the proposed development.</p> <p><u>Breeding</u> The development of apartment blocks and residential units will provide nesting opportunities for this species on the roofs of these structures.</p>
House Sparrow	<b>Amber</b>	<p><u>Foraging</u> The proposed development will reduce overall foraging grounds for house sparrow. This reduction is mitigated by the inclusion of parkland areas throughout the site and maintained degree of ecological connectivity from the site to wider foraging grounds via the retention and enhancement of onsite hedgerows. The inclusion of herb-layer buffers along onsite hedgerows and native wildflower / shrub planting throughout the site will provide foraging opportunities for this species onsite.</p> <p><u>Resting</u> Retention of hedgerows and compensatory planting of trees and hedgerows will provide suitable resting habitats for house sparrow onsite.</p> <p><u>Commuting</u> The retention, enhancement, and compensatory planting of onsite hedgerows will maintain commuting corridors for house sparrow through the site.</p> <p><u>Breeding</u> The retention, enhancement, and compensatory planting of hedgerows onsite, buffered by native herb / shrub ground layers, will provide breeding opportunities for house sparrow throughout the site. Further, the planting plan (incorporating AIPP plants) will create opportunities for invertebrate populations onsite, thereby providing a foodsource for house sparrow during the breeding season.</p>
Linnet	<b>Amber</b>	<p><u>Foraging</u> The proposed development will reduce overall foraging grounds for linnet. This reduction is mitigated by the inclusion of parkland areas throughout the site and maintained degree of ecological connectivity from the site to wider foraging grounds via the retention and enhancement of onsite hedgerows. The inclusion of herb-layer buffers along onsite hedgerows and native wildflower / shrub planting throughout the site will provide foraging opportunities for this species onsite.</p>

		<p><u>Resting</u> Retention of hedgerows and compensatory planting of trees and hedgerows will provide suitable resting habitats for linnet onsite.</p> <p><u>Commuting</u> The retention, enhancement, and compensatory planting of onsite hedgerows will maintain commuting corridors for linnet through the site.</p> <p><u>Breeding</u> Areas with confirmed Linnet breeding activity (central hedgerow) will be retained and enhanced as part of the proposed development. Increased hedgerow planting will create nesting opportunities for local Linnet populations. Further, the planting plan (incorporating AIPP plants) will create opportunities for invertebrate populations onsite, thereby providing a foodsource for Linnet during the breeding season.</p>
Skylark	<b>Amber</b>	<p><u>Foraging</u> The proposed development will reduce overall foraging grounds for skylark. This reduction is mitigated by the inclusion of parkland areas throughout the site and maintained degree of ecological connectivity from the site to wider foraging grounds via the retention and enhancement of onsite hedgerows. The inclusion of herb-layer buffers along onsite hedgerows and native wildflower / shrub planting throughout the site will provide foraging opportunities for this species onsite.</p> <p><u>Resting</u> Retention of hedgerows and compensatory planting of trees and hedgerows will provide suitable resting habitats for skylark onsite.</p> <p><u>Commuting</u> The retention, enhancement, and compensatory planting of onsite hedgerows will maintain commuting corridors for skylark through the site.</p> <p><u>Breeding</u> The retention, enhancement, and compensatory planting of hedgerows onsite, buffered by native herb / shrub ground layers, will provide breeding opportunities for skylark throughout the site, particularly in the isolated western parkland.</p>
Starling	<b>Amber</b>	<p><u>Foraging</u> The proposed development will reduce overall foraging grounds for starling. This species is adaptable to urban environments, and an overall reduction in foraging area is mitigated by the inclusion of parkland areas throughout the site and maintained degree of ecological connectivity from the site to wider foraging grounds via the retention and enhancement of onsite hedgerows. The inclusion of herb-layer buffers along onsite hedgerows and native wildflower / shrub planting throughout the site will provide foraging opportunities for this species onsite.</p> <p><u>Resting</u> Retention of hedgerows and compensatory planting of trees and hedgerows will provide suitable resting habitats for starling onsite.</p> <p><u>Commuting</u> The retention, enhancement, and compensatory planting of onsite hedgerows will maintain commuting corridors for starling through the site.</p> <p><u>Breeding</u></p>

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		<p>Areas with confirmed Starling breeding activity (central hedgerow) will be retained and enhanced as part of the proposed development. Increased hedgerow planting will create nesting opportunities for local Starling populations. Further, the planting plan (incorporating AIPP plants) will create opportunities for invertebrate populations onsite, thereby providing a foodsource for Starling during the breeding season.</p>
Swallow	Amber	<p><u>Foraging</u>  The proposed development will reduce overall foraging grounds for swallows. The inclusion of herb-layer buffers along onsite hedgerows and native AIPP wildflower / shrub planting throughout the site will encourage invertebrate populations onsite and therefore provide foraging opportunities for swallows onsite.</p> <p><u>Resting</u>  Retention of hedgerows and compensatory planting of trees and hedgerows will provide suitable resting habitats for swallows onsite.</p> <p><u>Commuting</u>  The retention, enhancement, and compensatory planting of onsite hedgerows will maintain commuting corridors for swallows through the site.</p> <p><u>Breeding</u>  Mitigation measures onsite include the provision of 20 x 10B Schwegler Swallow Nests placed in the vicinity of the built structures to the north of the site in the location of the existing barn. This will encourage swallows to continue to nest onsite. Further, the planting plan (incorporating AIPP plants) will create opportunities for invertebrate populations onsite, thereby providing a foodsource for Swallows during the breeding season.</p>

**Item 2(a)[vi]**

*'Further details on how commuting and foraging corridors through the landscape have been protected and enhanced, including north to south and east to west. Maintenance and development of a wide base of ground layers for hedgerows and treelines are recommended to ensure wildlife can actively use these corridors as intended. This includes hedgerows, treelines and other linear features, including watercourses and the riparian zone.'*

**Altamar Response**

As mentioned in Response 2(a)[v], the proposed development was designed to retain (where possible) and enhance linear ecological corridors that currently exist onsite. It should be noted that baseline commuting and foraging corridors onsite are partially segregated by dissecting tracks, roads, and existing residential developments. Where linear features would be lost, compensatory planting was proposed. As a result, 907 linear metres of hedgerow will be retained and enhanced onsite and a total of 2,068 linear metres of compensatory native hedgerow will be planted to offset hedgerow removal. As demonstrated in the Landscape Plan (see Figure 3), existing west-east ecological corridors expanding from the western parkland to the northern entranceway will be protected and enhanced. Additionally, the majority of north-south corridors dissecting the southern portion of the site will be retained. Further, following consultation with ParkHood Landscape Architects, the proposed landscape plan has been revised to include additional ground layers for hedgerows and trees. This materialises in the Landscape Plan as additional wildflower meadows next to H2, H29, H34, H37, H38, H39, H40 & H50. Wildflower grassland areas will also be incorporated into open space areas. Please refer to Drawing No. PHL-ZZ-ZZ-L-2000 Street Tree Plan which shows the extents of meadow planting that has been proposed along existing wildlife corridors.

See revisions to Section 4.9.2 for full details.



**Item 2(a)[vii]**

*'Tree removal plans from EIA Appendix I Arboricultural Report are missing. This is required to be provided in order for a robust assessment to be made on the hedgerows and trees that will be lost to the proposed development.'*

**Altamar Response**

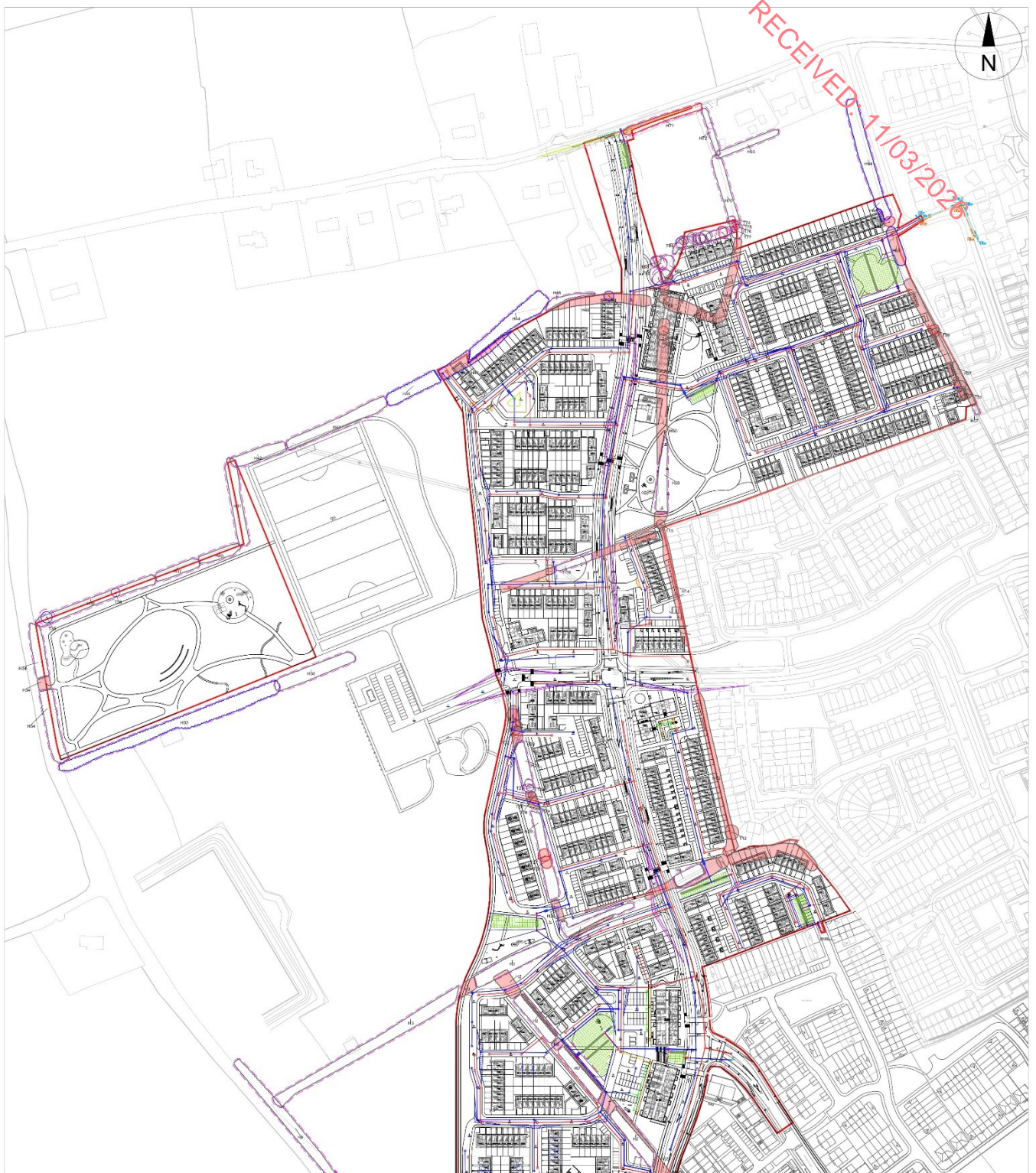
Tree Removal Plans were included in Appendix 4.1 Bat Fauna Assessment (Figures 2 & 3) of the original EIA. These Tree Removal Plans were analysed by Altamar to inform the assessment of potential impacts on flora, terrestrial fauna (including non-volant mammals, bats, and birds), and ecological corridors. For the purposes of clarity, the Tree Removal Plans have been included in this EIA Addendum Report (see Figures 4 & 5 below).

**Item 2(a)[viii]**

*'A large proportion of the proposed planting scheme includes non-native species. The proposed planting scheme should be revised to include native species only.'*

**Altamar Response**

The proposed planting scheme has been revised by ParkHood Landscape Architects to include native species.



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This drawing is to be read in conjunction with the respective arboricultural schedules and reports relevant to this project.

Where contradictions between this drawing and any other design information becomes apparent, the respective authors should be contacted immediately.

It is the responsibility of the main site contractor to check and verify all information and measurements on-site and confirm prior to the commencement of works, and to ensure that all site operations work in accordance with respective arboricultural reports and BS5837:2012. Trees in relation to design, demolition and construction

**BS5837:2012 Tree Categorisation**

**Category A**  
Trees of high quality with an estimated remaining life expectancy of at least 40 years

**Category B**  
Trees of moderate quality with an estimated life expectancy of at least 20 years

**Category C**  
Trees of low quality with an estimated life expectancy of at least 10 years, or young trees with a stem diameter below 100mm

**Category U**  
Those in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years

**Key**

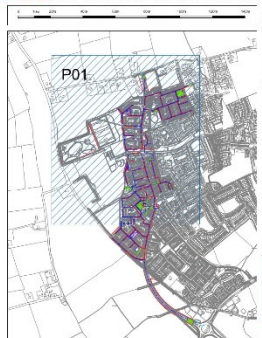
**Root Protection Areas**  
The minimum area around a tree deemed to contain sufficient roots and rooting volume to maintain the trees viability

Tree, Shrub or Hedgerow Group

**T23** Reference Number for Tree, Group or Hedgerow

Site boundary

Trees/Group to be Removed shown shaded RED



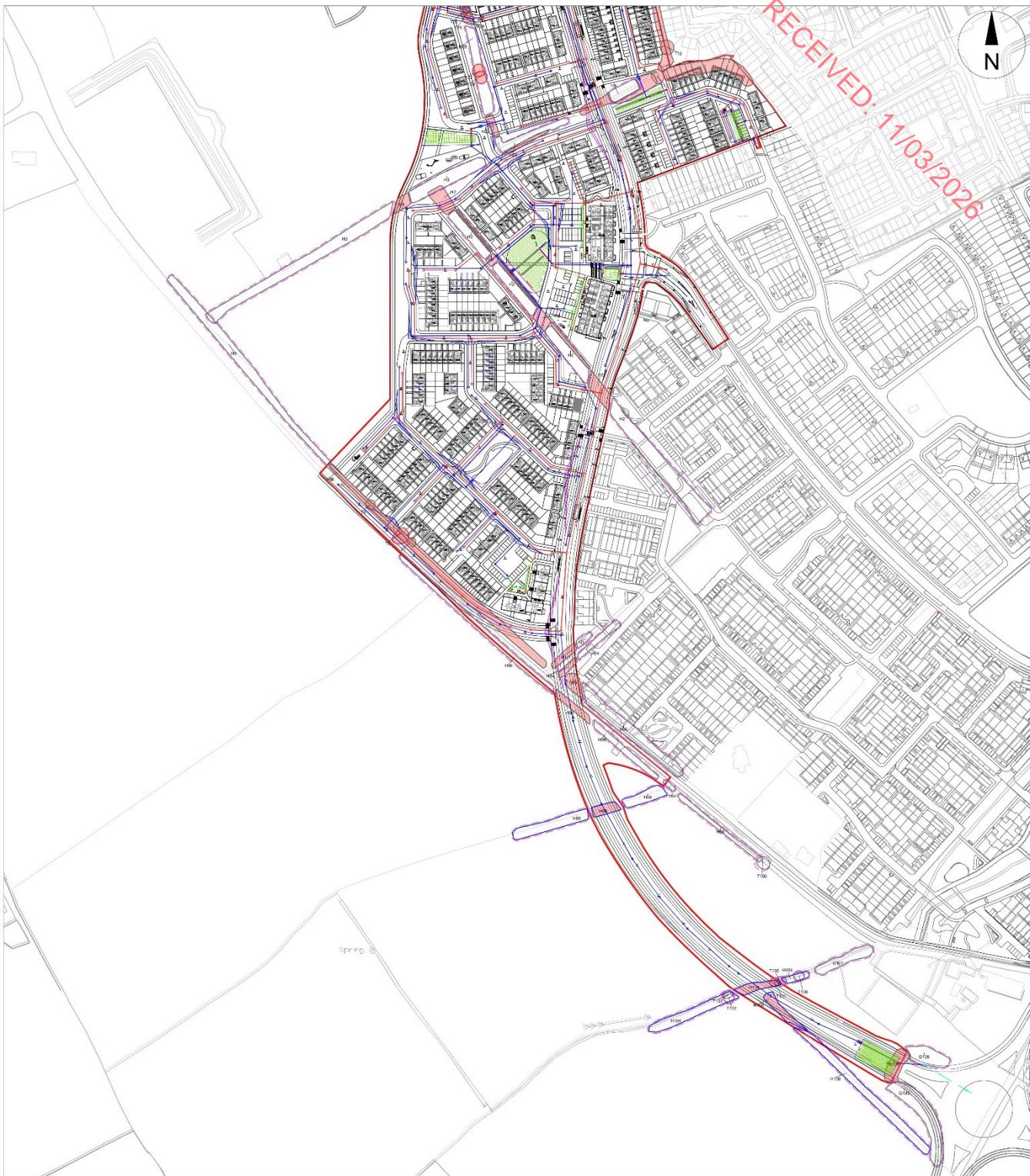
Revision	1	Nov 2020	Updated plans
Date			Description
<b>Tree Removals Plan 01</b>			
Project: <b>Flemington South LRD</b>			
Client: <b>Glenveagh Homes Ltd.</b>			
Date	15 Dec 2020	Scale	1:1000 @ A0
Drawn by	NAFB	Status	Planning
Checked by	CMC	Day no	250401-P-11-Q1
		Rev	A

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Figure 4. Tree removals plan (north)



This drawing is to be read in conjunction with the respective arboricultural schedules and reports relevant to this project.

Where contradictions between this drawing and any other design information becomes apparent, the respective authors should be contacted immediately.

It is the responsibility of the main site contractor to check and verify all information and measurements (on-site and/or prior to the commencement of work), and to ensure that all site operations work in accordance with respective arboricultural reports and BS5837:2012. Trees in relation to design, demolition and construction.

**BS5837:2012 Tree Categorisation**

- Category A**  
Trees of high quality with an estimated remaining life expectancy of at least 40 years.
- Category B**  
Trees of moderate quality with an estimated life expectancy of at least 20 years.
- Category C**  
Trees of low quality with an estimated life expectancy of at least 10 years, or young trees with a stem diameter below 150mm.
- Category U**  
Trees in such a condition that they cannot realistically be retained as living trees in the context of the current use and for longer than 15 years.

**Key**

- Root Protection Areas  
The minimum area around a tree deemed to contain sufficient roots and rooting volume to maintain the trees viability.
- Tree, Shrub or Hedgerow Group
- Reference Number for Tree, Group or Hedgerow
- Site boundary
- Trees/Group to be Removed shown shaded RED

Revision: 02  
Date: 10 Dec 2025  
Description: Updated plans

**Title:** Tree Removals Plan 02

**Project:** Flemington South LRD

**Client:** Glenveagh Homes Ltd.

**Date:** 10 Dec 2025  
**Drawn by:** CMAR  
**Scale:** 1:1000 @ A0  
**Status:** Planning  
**Created by:** CMAR  
**Eng ref:** 250401-P-11-02  
**Rec:** A

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Figure 5. Tree removals plan (south)

**Item 2(a)[ix]**

*'In order to fully assess bat survey efforts, details on the start and end time of surveys, weather conditions, routes of transects and trees surveyed are required.'*

**Altamar Response**

Details relating to the scope and conditions of bat surveys were outlined in Appendix 4.1 Bat Fauna Assessment submitted in the original planning application. Relevant survey details outlined within this submitted report are highlighted below (emphasis on original text added in **bold**; note that this does not represent any alterations to the report):

'Tree Potential Bat Roost Inspection

*A ground level roost assessment was carried and used to examine the trees on/proximate to the site for features that could form bat roosts. Potential roosting features include heavy ivy growth, broken limbs, areas of decay, vertical or horizontal cracks, cracks in bark etc. **All onsite trees were inspected for bat roosting potential during the daytime, where possible, for evidence of bat usage.***

Emergent Surveys

*Emergent survey were carried out by Bryan Deegan on the 20<sup>th</sup> April 2021, 08<sup>th</sup> June 2023, 13<sup>th</sup> June 2023 and the 27<sup>th</sup> June 2023. Emergent surveys were also carried out by Frank Spellman and Jack Doyle on the 22<sup>nd</sup> May 2025 & 14<sup>th</sup> August 2025. Bat activity was determined through visual observation and the use of an Echo meter touch 2 Pro handheld detector. **Surveyors were positioned at areas containing features of bat roosting potential at dusk to determine evidence of bat roosting onsite.***

Detector Surveys

*Following an emergent survey, a bat detector survey was carried out on the 20<sup>th</sup> April 2021, 08<sup>th</sup> June 2023, 13<sup>th</sup> June 2023, 27<sup>th</sup> June 2023, 22<sup>nd</sup> May 2025 & 14<sup>th</sup> August 2025. Detector surveys were carried out onsite using an Echo meter touch 2 Pro handheld detector to determine bat activity. Bats are identified by their ultrasonic calls coupled with behavioural and flight observations. **All areas of the site were surveyed for bat activity during the detector surveys.***

Desk Study

*A pre-survey bat data search was carried out in April 2021 and updated in June 2023, May 2025, and August 2025. This included examining records and data from the National Parks and Wildlife Service (NPWS), National Biological Data Centre (NBDC), Bat Conservation Ireland (BCI), in addition to aerial, 6-inch maps and satellite imagery.*

Survey Constraints

***All surveys were conducted within the active bat season and the transects covered the entire site multiple times during the night. Weather conditions were good with mild temperatures of 10°C after sunset. Winds were light and there was no rainfall. Insects were observed in flight during all surveys.***

*As outlined in Collins (2016) in relation to weather conditions 'The aim should be to carry out surveys in conditions that are close to optimal (sunset temperature 10°C or above, no rain or strong wind.), particularly when only*

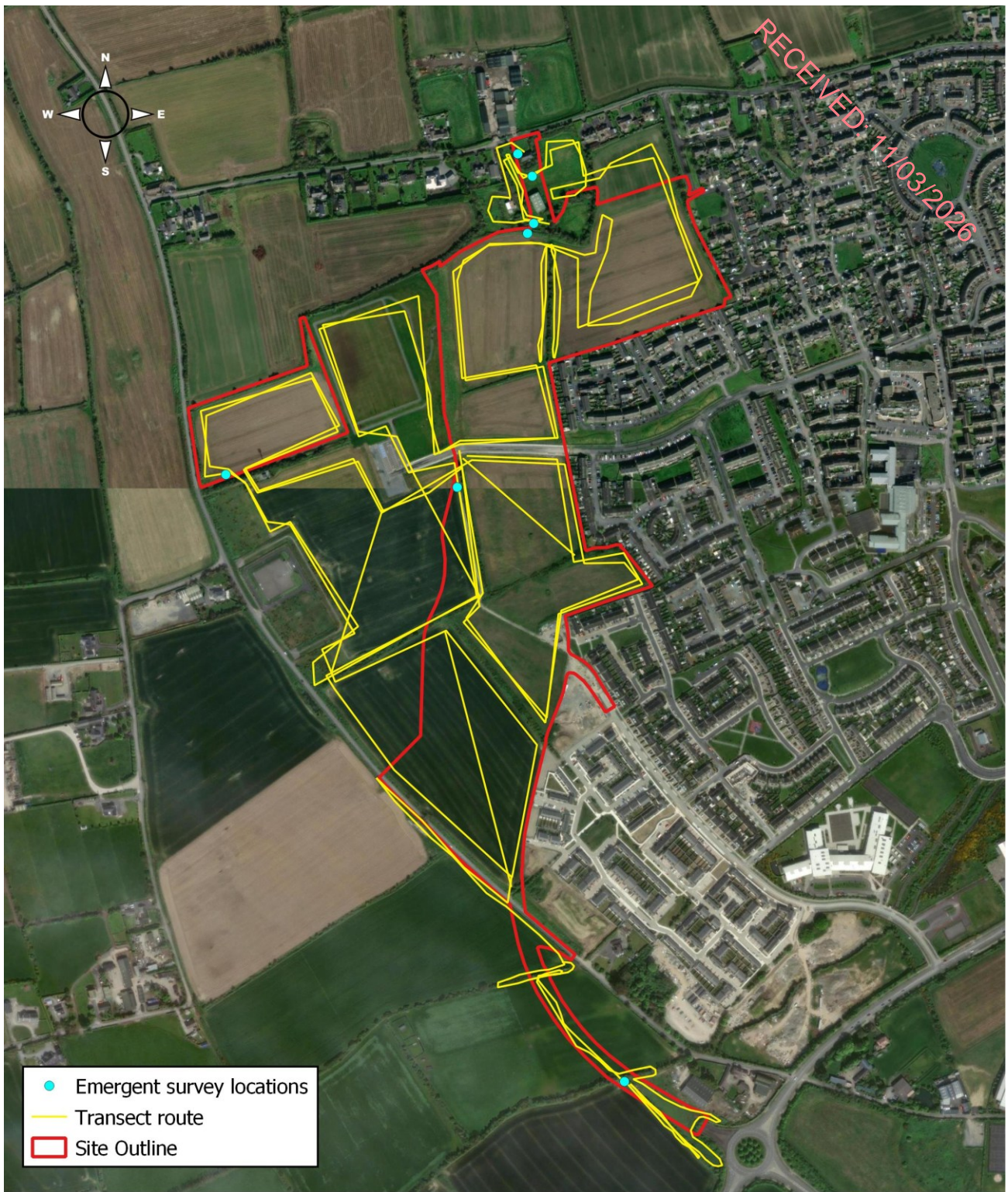
*one survey is planned.... Where surveys are carried out when the temperature at sunset is below 10°C should be justified by the ecologist and the effect on bat behaviour considered.’ **There were no constraints in relation to the surveys carried out. All areas of the site were accessible, and weather conditions were optimal for bat assessments.’***

The information above outlines bat survey efforts and demonstrates that all trees / structures were assessed for bat roosting potential, weather conditions were optimal for bat surveys, all areas of the site were accessible. There were no constraints in relation to the surveys carried out.

Table 1 (Appendix A1) and Figure 6 (below) have been included to provide clarity in relation to the surveys carried out as part of the Bat Impact Assessment report. However, as outlined above, there were no constraints in relation to the surveys carried out to inform the original EIAR. As a result, the inclusion of information below does not change the assessment, findings, or validity of the original EIAR. These inclusions have no material impact on the assessment of bat survey efforts.

Table 1. Further bat survey details

Survey Date	Surveyor(s)	Start Time	End Time	Weather Conditions
20 <sup>th</sup> April 2021	Bryan Deegan	19:21	22:39	Weather conditions were good with mild temperatures of 10°C after sunset. Winds were light and there was no rainfall. Insects were observed in flight
08 <sup>th</sup> June 2023	Bryan Deegan	21:14	23:27	Weather conditions were good with mild temperatures of 10°C after sunset. Winds were light and there was no rainfall. Insects were observed in flight
13 <sup>th</sup> June 2023	Bryan Deegan	21:27	23:35	Weather conditions were good with mild temperatures of 10°C after sunset. Winds were light and there was no rainfall. Insects were observed in flight
27 <sup>th</sup> June 2023	Bryan Deegan	20:41	23:14	Weather conditions were good with mild temperatures of 10°C after sunset. Winds were light and there was no rainfall. Insects were observed in flight
22 <sup>nd</sup> May 2025	Frank Spellman	20:30	23:05	Weather conditions were good with mild temperatures of 10°C after sunset. Winds were light and there was no rainfall. Insects were observed in flight
14 <sup>th</sup> August 2025	Frank Spellman & Jack Doyle	20:24	22:35	Weather conditions were good with mild temperatures of 10°C after sunset. Winds were light and there was no rainfall. Insects were observed in flight



0 250 500 750 m

Project: Flemington South LRD  
 Location: Balbriggan, Co. Dublin  
 Date: 03/03/2026  
 Drawn By: Jack Doyle (Altamar)

**ALTEMAR**  
 Marine & Environmental Consultancy



Figure 6. Further Bat Survey Details

## Conclusion

The assessment undertaken as part of this EIAR Addendum Report indicates that, following a review of Items 2(a)[i]-[ix] of the Request for Additional Information received from Fingal County Council (FCC) (PF/051/26) relating to a proposed Large-Scale Residential Development (LRD) application (Reg. Ref. LRD0069/S3E), there are no material changes to the assessment, findings, or validity of the original EIAR. Consequently, revisions to the design of the proposed development do not constitute any significant alteration to the findings of the original EIAR. Revisions to the submitted EIAR outlined in this Addendum Report solely aim to provide further clarification to the competent authority relating to queries made in Items 2(a)[i]-[ix].