
Relevant Assessments Article 299B Statement

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Project Proposed Mixed Use Development at Finglas
Business Centre, Jamestown Road, Finglas,
Dublin 11

Subject Article 299B (1)(b)(ii)(II)(C) Statement

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1.0 INTRODUCTION

AWN Consulting have been appointed by the Applicant 'Jamestown Village Limited', to prepare this statement in accordance with the provisions of Article 299B(1)(b)(ii)(II)(C) of the Planning and Development Regulations 2001 (as amended; hereafter referred to as the "Planning Regulations"), this document provides a 'statement indicating how the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive (Directive 2014/52/EU) have been taken into account'.

This statement is part of the information provided by the Applicant so that the Board may complete an examination for the purposes of a screening determination in accordance with Articles 229B and 229C of the Planning Regulations. This statement will identify the relevant European Union legislation, and assessments of the effects on the environment carried out pursuant thereto, which have informed the proposed development. These relevant assessments will be identified as they relate to the proposed development, the results of those assessments will be outlined, and how those results have been taken into account in determining the significance of the proposed development on the environment will be identified.

The proposal comprises the redevelopment of a vacant former factory site (c. 1.76 ha) Finglas Business Centre, Jamestown Road, Finglas, Dublin 11 and construction of a mixed-use development across 5 no. Blocks (A-E) providing 321 no. Build to Rent apartments 110 no. 1-bed and 211 no. 2-bed units (each with balcony or terrace) and c. 4,497 sqm gfa. of commercial uses.

The development will consist of:

1. Demolition of existing ESB substation and boundary treatments.
2. Block A (6 storeys) comprises a c. 195 sqm café, bike and bin storage, ESB substation, meter room and switch room at ground floor level with 79 apartments (28 no. 1-bed and 51 no. 2-bed units) at ground to fifth floor level.

3. Block B (6 storeys) comprises 47 apartments (23 no. 1-bed and 24 no. 2-bed units) with bike storage and meter room at ground floor level.
4. Block C (6 storeys) comprises a c. 290 sqm crèche, bin and bike storage, ESB substation, meter rooms and switch room at ground floor and 90 no. apartments (34 no. 1-bed and 56 no. 2-bed units) at ground to fifth floor level.
5. Block D (6 storeys) comprises a c. 450 sqm public gymnasium, ESB substation, switch room, meter room, bin and bike storage at ground floor alongside residential amenity space (c. 841.6 sqm) at ground floor including gym, study area, library/ quiet room, lounge, games area, kids play room, shared kitchen and cinema room with 105 apartments (25 no. 1-bed and 80 no. 2-bed units) at first to fifth floor level and external roof terrace (c. 469 sqm).
6. Block E (5 storeys) comprises c. 125 sqm of retail, c. 262 sqm of flexible office space, ESB substation, switch room, WCs, reception and bin store at ground floor with c. 2,176 sqm of flexible office space at first to fourth floor level, with c. 686.8 sqm basement below providing 56 no. bicycle parking spaces, plant, storage and shower facilities associated with the office building.
7. Provision of external communal open space in a landscaped garden courtyard extending to c. 1,891 sqm with children's play area, open air stairs and lift providing access to basement parking and c. 168 sqm of communal open space at residents' allotments at the southern elevation of Block A, with c. 2,017 sqm of public open space provided, bicycle parking areas provided throughout the surface level of the site.
8. Shared vehicular and bicycle access is taken from a new secondary access road branching west from Jamestown Road at the northeast corner of the site (extending to the western boundary), with 17 surface car parking spaces (including 8 no. visitor [3 accessible], 4 no. crèche, 5 no. Go Car [1 accessible] spaces) in the northern part of site, with ramp access to a basement level (c. 6,386 sqm) providing 175 car parking spaces (163 no. residential [5 no. accessible], 5 no. Go Car, 7 no. office [1 accessible]) and 12 motorbike parking spaces, with a total of 907 no. bicycle parking spaces (171 at ground floor and 736 at basement).
9. A total of c. 1,049.2 sqm of residential support facilities in the form of laundry, management suite, reception, WCs, bin and bike storage.
10. All circulation and ancillary uses, associated infrastructure and enabling works associated with the development, green/blue roofs, telecommunications equipment (radio antennas and microwave link dishes at Block D roof level) landscaping, pedestrian access, set down area at southern perimeter, boundary treatments and ESB substation at northern perimeter.

2.0 HABITATS DIRECTIVE (DIRECTIVE 92/43/EEC) AND BIRDS DIRECTIVE (DIRECTIVE 2009/147/EC)

The main EU legislation for conserving biodiversity is the Directive 2009/147/EC of the European Parliament and of the Council of November 2009 on the conservation of wild birds (Birds Directive); and the Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (Habitats Directive).

The Habitats Directive is the cornerstone of habitats and species protection in Ireland. The Habitats Directive (92/43/EEC) and the associated Birds Directive (2009/147/EC) are transposed into Irish legislation by Part XAB of the 2000 Act and the European

Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011) as amended.

The main aim of the Habitats Directive is the conservation of biodiversity by requiring Member States to take measures to maintain or restore natural habitats and wild species listed on the Annexes to the Directive at a favourable conservation status. These annexes list habitats (Annex I) and species (Annexes II, IV and V) which are considered threatened in the EU territory. The listed habitats and species represent a considerable proportion of biodiversity in Ireland and the Directive itself is one of the most important pieces of legislation governing the conservation of biodiversity in Europe.

Articles 10 of the Habitats Directive and the Habitats Regulations 2011 place a high degree of importance on non-Natura 2000 areas as features that connect the Natura 2000 network. Articles 12 and 16 of the Habitats Directive establish a system of strict protection for the animal species listed in Annex IV(a), but also allow for derogation from these provisions under defined conditions.

2.1 RELEVANT ASSESSMENTS

Appropriate Assessment (AA) Screening

An Appropriate Assessment (AA) Screening has been undertaken for proposed development by Enviroguide (2021). This takes into account the requirements of the objectives of the Habitats Directive and the Birds Directive. This is included with the planning documentation. The AA Screening concludes:

*In conclusion, upon the examination, analysis, and evaluation of the relevant information, and n applying the precautionary principle; it is concluded by the authors of this report that, on the basis of objective scientific information, **the possibility may be excluded** that the Proposed Development will have any significant effect on the following four European sites (or any other European Site for that matter) noted to be linked by a Source-Pathway-Receptor impact pathway, due to the nature of the development and the insignificant nature of the indirect hydrological onnection with the Site of the Proposed Development:*

- North Dublin Bay SAC [000206]
- South Dublin Bay SAC [000210]
- South Dublin Bay and River Tolka Estuary SPA [004024]
- North Bull Island SPA [004006]

These complete, precise, and definitive findings, based on the best available scientific evidence, remove all reasonable scientific doubt that the Proposed Development will have any significant impacts on the European sites detailed above. It is also noted that, pursuant to the judgement in C-323/17 People Over Wind and Peter Sweetman v Coillte, no measures intended to avoid or reduce the potential harmful effects of the project on any European site have been taken into account in this Appropriate Assessment Screening Report and its conclusions.

Further, as noted above and as supported by the Hydrological Risk Assessment prepared by AWN Consulting and submitted with this application, while best practice drainage and SuDS measures have been incorporated into the project design, these measures have no impact on

the screening assessment and determination offered herein. It is our professional assessment that even if these measures weren't embedded in the project design, and the project proceeded without these best practice design measures, given the nature of the development and the weak hydrological connection to Dublin Bay the screening determination herein would not be affected.

The conclusions of the AA Screening have been adopted within the EIA Screening Report (Sections 3.4 and Section 5.3) when considering the ecological sensitivity of the site and determining the likelihood of significant effects on the environment arising from the proposed development with particular attention to potential impacts on European Sites.

Ecological Statement

An Ecological Statement has been undertaken for proposed development lands by Enviroguide Consulting (2021) and is included with the planning documentation.

This report includes an assessment of potential impacts on biodiversity, including protected species or habitats, that are likely to arise from the residential development during either the construction or operation phases.

The Ecological Statement considers that:

*The Proposed Development will provide a significant increase in tree cover at the Site, with a variety of native and non-native tree species proposed to be planted across the Site area. Native hedgerow is proposed in the form of Hawthorn (*Crataegus monogyna*) along the western boundary, along with associated tree planting. It is noted that overall, the proposed landscaping at the Site will be urban in nature, however, based on the existing condition of the land i.e., largely covered in hardstanding, the significant increase in vegetated habitats and tree planting the Proposed Development with entail, along with extensive green-roofing across the various blocks; will increase the provision of habitats for breeding birds and bats at the Site, and contribute to the limited network of green spaces in a largely commercial area.*

As such it is deemed that, based on the existing nature of the Site, and what is proposed as part of the Proposed Development, the overall impact of said Development will be a slight/moderate positive one, and that no significant adverse impacts will occur as a result.

The conclusions of the Ecological Statement have been adopted within the EIA Screening Report (Section 3.4 and 5.3) when considering the ecological sensitivity of the site and determining the likelihood of significant effects on the environment arising from the proposed development in respect of Biodiversity, with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive.

Bat Survey Report

All Irish bat species are protected under the Wildlife Act (1976) and Wildlife Amendment Acts (2000 and 2010). Also, the EC Directive on The Conservation of Natural habitats and of Wild Fauna and Flora (Habitats Directive 1992), seeks to protect rare species, including bats, and their habitats and requires that appropriate monitoring of populations be undertaken. Across Europe, they are further protected under the

Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention 1982), which, in relation to bats, exists to conserve all species and their habitats. The Convention on the Conservation of Migratory Species of Wild Animals (Bonn Convention 1979, enacted 1983) was instigated to protect migrant species across all European boundaries. The Irish government has ratified both these conventions.

All bats are listed in Annex IV of the Habitats Directive and the lesser horseshoe bat is further listed under Annex II of the Habitats Directive.

The Bat Assessment prepared for the proposed development included as an appendix to the Ecological Statement (ASH Ecology and Environmental, 2021) concludes that with the recommendations implemented in respect of site lighting and tree felling any impacts to bats from the proposed development are likely to be negligible.

The conclusions and recommendations set out in the Bat Survey Report (ASH Ecology and Environmental, 2021) have been adopted within the EIA Screening Report when determining the likelihood of significant effects on the environment, arising from the proposed development in respect of Biodiversity, with particular attention to species and habitats (with specific reference to bat) protected under the Habitats Directive and the Birds Directive.

3.0 WATER FRAMEWORK DIRECTIVE (DIRECTIVE 2000/60/EC)

The Water Framework Directive (WFD) (Directive 2000/60/EC) requires all Member States to protect and improve water quality in all waters. The WFD is one of the key overarching instruments in the protection of waters and includes subordinate directives or water-related legislation have been developed in response to, the Water Framework Directive.

The WFD requires 'Good Water Status' for all European waters to be achieved through a system of river basin management planning and extensive monitoring by 2015 or, at the least, by 2027. 'Good status' means both 'Good Ecological Status' and 'Good Chemical Status'.

The objectives of the WFD are (1) to prevent the deterioration of water bodies and to protect, enhance and restore them with the aim of achieving at least good status and (2) to achieve compliance with the requirements for designated protected areas

3.1 RELEVANT ASSESSMENTS

A Hydrological and Hydrogeological Qualitative Risk Assessment has been prepared by AWN Consulting (2021) and included with the planning documentation. The Risk Assessment has been informed by the water quality status as defined by the monitoring program and assessment undertaken by the EPA pursuant to the obligations to the WFD. The results of the monitoring program and assessment undertaken by the EPA are summarised below:

The River Tolka (Section: Tolka_050) has a WFD status (2019) of 'poor'. Dublin Bay has a WFD status of 'Good'. The River Tolka has a WFD risk score of 'At risk' of not achieving good status' while the Dublin Bay waterbody has a WFD risk score of 'Not at risk'. The ecological status (which comprises biological and chemical status) of transitional and coastal water bodies during 2013-2018 for the Tolka Estuary and Dublin Bay is classed as 'moderate' and 'Good' respectively.

The most recent surface water quality data for the Liffey Estuary Upper and Dublin Bay (2019-2020) indicate that they are 'Unpolluted'. Under the 2015 'Trophic Status Assessment Scheme' classification of the EPA, 'Unpolluted' means there have been no breaches of the EPA's threshold values for nutrient enrichment, accelerated plant growth, or disturbance of the level of dissolved oxygen normally present.

The results of this assessment provided by the EPA have been used to determine the current water body status of the aquifer and receiving waters for any discharge from the proposed development site.

The current water body status has been considered within the EIA Screening (Section 4.2) and also informed the Appropriate Assessment (AA) Screening undertaken for the proposed development by Enviroguide (2021). The EIA Screening (Section 5.2) concludes that there are only weak pollutant linkages therefore; the proposed development will not have an impact on the current Water Body Status (as defined within the Water Framework Directive).

The current water body status has been considered in the examination of the likelihood of significant effects on water quality in the Tolka Estuary and Dublin Bay having regard to potential indirect impacts from surface water and foul water arising from the proposed development during the construction and operational phases.

4.0 THE FLOODS DIRECTIVE (DIRECTIVE 2007/60/EC)

The Floods Directive (Directive 2007/60/EC) establishes a framework for the assessment and management of flood risks, with the aim to reduce the adverse consequences on human health, the environment and material assets.

The Floods Directive requires Member States to assess if all water courses and coast lines are at risk from flooding, to map the flood extent and assets and humans at risk in these areas and to take adequate and coordinated measures to reduce this flood risk. The Floods Directive also reinforces the rights of the public to access this information and to have a say in the planning process.

The Floods Directive must be implemented in tandem with the WFD. In Ireland, the OPW is the national authority assigned with the implementation of the Floods Directive, which was transposed into Irish law by the EU (Assessment and Management of Flood Risks) Regulations SI 122 of 2010.

4.1 RELEVANT ASSESSMENTS

Dublin City Council as part of the Dublin City Development Plan (2016-2022) undertook a Strategic Flood Risk Assessment (FRA), which assessed the flood risk indicators in relation to land use proposals pursuant to the Floods Directive. The subject lands are located outside the 1,000-year flood zones identified in the Strategic FRA, and is therefore Flood Zone C.

A Site-Specific Flood Risk Assessment (FRA) has been prepared by Lohan & Donnelly and is included with the application documentation. This Site-Specific FRA draws on, and is informed by, the available Dublin City Council Strategic FRA, including the Flood Zone C designation.

The Site-Specific FRA considers that the proposed development is appropriate for the Flood Zone C locations and therefore, further assessment and justification test is not

required under The Planning System and Flood Risk Management (OPW, 2009). The potential impact of climate change has been allowed for in the design of the surface water drainage network in accordance with the Greater Dublin Strategic Drainage Study Design Criteria.

The results of the Site-Specific FRA and the Strategic FRA have been considered with the EIA Screening Report in the examination of the likelihood of significant effects on the environment arising from the proposed development as a consequence of flooding, which has the potential to affect human health and material assets.

5.0 SEVESO DIRECTIVE 82/501/EEC, SEVESO-II DIRECTIVE 96/82/EC, SEVESO-III DIRECTIVE 2012/18/EU

The Seveso Directive (Directive 82/501/EEC, Directive 96/82/EC, Directive 2012/18/EU) was developed by the EU after a series of catastrophic accidents involving major industrial sites and dangerous substances. Such accidents can give rise to serious injury to people or serious damage to the environment, both on and off the site of the accident.

The Chemicals Act (Control of Major Accident Hazards involving Dangerous Substances) Regulations 2015 (S.I. No. 209 of 2015) (the “COMAH Regulations”), implements the latest Seveso III Directive (2012/18/EU). The purpose of the COMAH Regulations is to transpose the Seveso Directive into Irish law and lay down rules for the prevention of major accidents involving dangerous substances, and to seek to limit as far as possible the consequences for human health and the environment of such accidents, with the overall objective of providing a high level of protection in a consistent and effective manner.

5.1 RELEVANT ASSESSMENTS

The proposed development is of a type not especially vulnerable to risk of major accidents as there are no substances to be stored as part of the proposed development that would be controlled under Seveso Directive or COMAH Regulations, and the site is not located near any existing Seveso site.

The closest SEVESO site to the proposed development is the Lower combined cycle gas turbine power plant operated by Gensys Power Limited; the Huntstown Power Station campus located 2.7 km away. The proposed development site is not located within the consultation zones; therefore, this site does not form a constraint to the proposed development at this location.

Due to the separation distance from the proposed development site to the nearest site controlled under the Seveso site Directive, and the fact that it lies outside the consultation zone are no specific assessments required by the Applicant under the Seveso Directive or COMAH Regulations.

6.0 CLEAN AIR FOR EUROPE (CAFE) DIRECTIVE (DIRECTIVE 2008/50/EC)

The Clean Air for Europe (CAFE) Directive 2008/50/EC is the prevailing legislation to improve the quality of air in Europe and limit exposure to air pollution. The CAFE Directive set rules including how to monitor, assess, and manage ambient air quality.

Overall, the main objective of the CAFE Directive is to reduce human and environmental exposure to air pollutants and ensure that the limits of values and

thresholds are not exceeded. The CAFE Directive was transposed into Irish legislation by S.I. No. 180/2011 - Air Quality Standards Regulations 2011.

The CAFÉ Directive mandates the location and quantity of air monitoring stations that Environmental Protection Agency (EPA) should undertake ambient air monitoring. If there is an exceedance of the ambient limit value an Air Quality Action Plan must be developed by Local Authorities in conjunction with the EPA.

In Ireland there is only one monitoring site that has exceedance of the EU Air Quality limit value for nitrogen dioxide, this is located at St. John's Road West station Dublin. An annual average concentration of 43 µg/m³ was measured in 2019. This is above the EU annual limit value for NO₂ of 40 µg/m³. This exceedance of an air pollution standard is as a result of the heavy traffic passing this monitoring station. In response to this an Air Quality Action Plan will be developed by the Dublin Local Authorities in conjunction with the EPA, this is not due for publication until the end of 2021.

6.1 RELEVANT ASSESSMENTS

There are no Air Quality Action Plans published in Ireland. Furthermore, the proposed development is not located within an area has an identified exceedance in the EU air quality limits; therefore, there are no specific assessments under the CAFE Directive relevant to the proposed development at this location. Irrespective of this, AWN Consulting have assessed the potential air quality impacts that the proposed development may have on the receiving environment during the construction and operational phases of the proposed development.

The Air Quality Impact Assessment produced by AWN Consulting Ltd has been informed by the Environmental Protection Agency's National Ambient Air Quality Monitoring Network and assessments undertaken by the EPA pursuant to the obligations of the CAFE Directive. Specifically, published data for nitrogen dioxide (NO₂), and particulate matter (PM₁₀, and PM_{2.5}).

Impacts to air quality can occur during both the construction and operational stages of the proposed development. Construction stage impacts are primarily in relation to construction dust emissions while operational phase impacts are as a result of traffic emissions from vehicles accessing the proposed development.

A detailed construction dust impact assessment was conducted and is detailed within the Air Quality Impact Assessment report. The Air Quality Impact Assessment states that a detailed dust management plan will be required for the construction phase of the proposed development to ensure that any potential dust emissions are minimised and impacts to nearby receptors are not significant. The dust management plan is outlined within Appendix 2 of the Air Quality Impact Assessment report and will be incorporated into the overall Construction Environmental Management Plan (CEMP) for the development. The site contractor will have the responsibility for ensuring full implementation of the CEMP on site and that the dust mitigation measures are enforced on site.

The Traffic & Transport Assessment (TTA) prepared by Transport Insights was used to inform the operational phase air quality impact assessment. It was determined that as the change in traffic on the local road network as a result of the proposed development was below the applicable screening criteria. Therefore a detailed air assessment was scoped out as there is no potential for significant impacts to air quality as a result of traffic emissions.

The Air Quality Assessment report states that national air quality shall not be adversely affected as a result of the short-term construction phase (after the implementation of mitigation measures), or the long-term operational phase thus ensuring that the potential for adverse impacts on human health is negligible.

The conclusions and mitigation measures set out in the Air Quality Impact Assessment have been adopted within the EIA Screening Report (Section 5.4) in the examination of the likelihood of significant effects on the environment arising from the proposed development in respect of Air Quality.

7.0 THE WASTE FRAMEWORK DIRECTIVE (DIRECTIVE 2008/98/EC)

Directive 2008/98/EC has applied since December 2010 and Amending Directive (2018/851/EU) was adopted on 30 May 2018 (together, the “Waste Framework Directive”). The Waste Framework Directive was transposed into national legislation by the European Union (Waste Directive) Regulations 2011-2020, which includes amendments to the Environmental Protection Agency Act 1992 (as amended) and the Waste Management Act 1996 (as amended).

The Waste Framework Directive sets long-term objectives for the Union’s waste management and gives economic operators and Member States a clear direction for the investments to achieve those objectives. The overall goal of the directives is to improve EU waste management. This will contribute to the protection, preservation, and improvement of the quality of the environment as well as encourage the prudent and rational use of natural resources.

The Waste Framework Directive includes requirements for member states to carry out certain monitoring and assessment, including in relation to the implementation of the waste prevention measures, implementation of measures on re-use and food waste prevention measures, need for waste installation infrastructure, waste collection schemes, rates of recycling and landfill and the implementation of waste management plans and waste prevention programmes.

One of the major relevant aspects of the Waste Directive in relation to construction sites is Article 5 that is transposed into Irish legislation by Article 27 of the Waste Directive Regulations. The Waste Directive provides a formal mechanism by which a substance or object, which is production residue, could be determined not be a waste but instead a by-product.

7.1 RELEVANT ASSESSMENTS

The Eastern-Midlands Region Waste Management Plan 2015-2021 published by the Dublin City Council on behalf of the Eastern-Midland Waste Region is the overarching policy document set out how the requirements of the Waste Framework Directive are met.

There are no specific assessments required by the applicant pursuant to the Waste Framework Directive. Irrespective of this, a Construction & Demolition By-Product Waste Management Plan prepared by Byrne Environmental is included with the planning documentation. The principles set out in the Waste Framework Directive have been taken into account thorough the design of the proposed development and the mitigation measures set out in these reports.

The Construction & Demolition Waste and By-Product Management Plan (Byrne Environmental Consulting, 2021) has been prepared to demonstrate how it is proposed

during the Construction Phase to comply with the following relevant legislation and guidelines including:

- Waste Management Acts 1996 (as amended)
- Waste Management (Collection Permit) Regulations 2007 (SI No. 820 of 2007)
- Waste Management (Collection Permit) Amendment Regulations 2008 (SI No. 87 of 2008)
- Department of the Environment, Heritage and Local Government – Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects – July 2006
- The Eastern-Midlands Region Waste Management Plan 2015-2021
- EPA “Guidance on Soil and Stone By-Products in the context of Article 27 of the European Communities (Waste Directive) Regulations – Version 3 June 2019

The management measures set out in Section 6 of the Construction & Demolition Waste and By-Product Management Plan have been adopted within the EIA Screening Report (Section 5.9) in the examination of the likelihood of significant effects on the environment arising from the proposed development in respect of material assets and waste.

8.0 STRATEGIC ENVIRONMENTAL ASSESSMENT (DIRECTIVE 2001/42/EC)

Directive 2001/42/EC, the SEA Directive, on the assessment of the effects of certain plans and programmes on the environment requires that an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment. Public plans and programmes that are likely to have significant effects on the environment must have a Strategic Environmental Assessment (SEA).

The SEA Directive (2001/42/EC) is implemented in Ireland by the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (SI 435/2004) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI 436/ 2004), as amended.

8.1 RELEVANT ASSESSMENTS

Dublin City Council as part of the Dublin City Development Plan (2016-2022) undertook a Strategic Environmental Assessment (SEA), to provide a clear understanding of the likely environmental consequences of decisions regarding the adoption and implementation of the Plan. The SEA Statement establishes the residual effects after implementation of the Dublin City Development Plan (2016-2022) as shown in Table 5.1 below.

Environmental Component	Residual Effect
Population and Human Health	None
Biodiversity, Flora and Fauna	Loss of biodiversity with regard to European Sites and Annexed habitats and species and loss of biodiversity to designated sites, including wildlife sties and listed species.
Water	Potential significant adverse impact on quality and status of water bodies. Limitations of Wastewater Treatment Facility at Ringsend which could lead to deterioration of water based habitats and species and to the quality of water. Failure to comply with the drinking water regulations and to provide new development with a clean water supply.
Air and Climatic Factors	Increase in the number of flood events due to increased development pressure on the land, and hard surfacing areas of the city. Uncertainty with regard to extreme flood events. Failure to tackle climate change and emissions from transport and issues regarding climate change.
Material Assets	Increase in waste levels.
Architectural Heritage	Effects on entries to the Record of Protected Structures.
Archaeological Heritage	Effects on entries to the record of Projected Monuments and Places and other archaeological heritage.
Landscape	Potential adverse impacts arising from visual impacts on the landscape.

Figure 8.1 *Dublin CDP SEA Statement Potential Residual Effects*

The residual effects of particular relevance to the proposed development are those that relate to Water Quality, in respect of the limitations at Ringsend, and Flooding in respect of the increase in areas of hardstanding. The potential residual effects in respect of Water Quality, and Flooding that have been identified in the SEA have informed the Appropriate Assessment (AA) Screening Report (Enviroguide, 2021) and the Site-Specific Flood Risk Assessment (T.J. O'Connor & Associates, 2021) for the proposed development.

The results of these assessments have been considered within the EIA Screening Report in the examination of the likelihood of significant effects on the environment arising from the proposed development on the existing water regime and have informed in particular the assessment of potential impacts on the water quality of Dublin Bay and the European Sites located there.

The application is accompanied by a Statement of Consistency prepared by John Spain Associates, which demonstrates that proposed development is broadly consistent with the Dublin City Development Plan 2016-2022, which itself was subject to SEA. Overall, the proposed development is line with the objectives of the Development Plan and the land use zoning. The Material Contravention Statement addresses any elements of the scheme, which are not fully in accordance with the Development Plan.