

EIAR ADDENDUM REPORT

PREPARED AS PART OF A

LARGE SCALE RESIDENTIAL DEVELOPMENT
PLANNING APPLICATION

AMENDING SHD PERMISSION
ABP REF.: 313289-22

ON A SITE AT

HARTFIELD PLACE, SWORDS ROAD, WHITEHALL, DUBLIN 9

SUBMITTED ON BEHALF OF EW Property Ltd

SEPTEMBER 2024

INTRODUCTION

This EIAR Addendum Report accompanies a planning application by EW Property Ltd under Section 32D of the Planning and Development Act (Amendment)(Large-scale Residential Development), for modifications/amendments to a residential development permitted under ABP Reg. Ref.: 313289-22. This report provides details of the proposed modifications and amendments to the permitted development, the site context and an assessment of the potential impacts associated with the proposed modifications in terms of the potential environmental impacts and effects that may arise.

PURPOSE OF THIS REPORT

The purpose of this EIAR Addendum Report is to provide the necessary environmental information to enable an informed determination of whether consent should be granted for the proposed modifications to the permitted development.

The proposed application is described in the statutory notices as follows:

EW Property Ltd intend to apply for Permission for a Large-Scale Residential Development to amend permitted Strategic Housing Development Reg. Ref. 313289-22 at a site at Hartfield Place, Swords Road, Whitehall, Dublin 9. The site is bound to the west by Swords Road, to the south by Highfield Hospital, to the north by vacant land and GAA pitches, and to the east by Beechlawn Nursing Home.

The development will amend permitted Strategic Housing Development (SHD) Reg. Ref. ABP-313289-22 and will consist of alterations to 5 no. (Blocks A - E) of the 7 no. permitted apartment blocks. The amendments will increase the total number of residential units by 29, resulting in an overall total of 334 units in Blocks A - E. The revised residential mix in Blocks A - E will comprise 150 no. 1-beds, 153 no. 2-beds and 31 no. 3-bed apartments. Alterations will include the following:

- ***Block A will provide 57 no. apartments (+6 over permitted) and will range in height from 5-8 storeys (as permitted) and will be c.0.52m lower overall. Block A will include a revised creche (c.399.2 sq.m with 178.7sqm outdoor space), café (c.105 sq.m), and communal amenity space (c.357 sq.m).***
- ***Block B will provide 76 no. apartments (+10 over permitted) and will range in height from 5-6 storeys (as permitted) and will be c.0.17m higher.***
- ***Block C will provide 53 no. apartments (-1 below permitted) and will range in height from 4-6 storeys (as permitted) and will be c.0.4m lower.***
- ***Block D will provide 79 no. apartments (+3 over permitted) and will range in height from 7-8 storeys (as permitted) and will be c.1.81m higher.***
- ***Block E will provide 69 no. apartments (+11 over permitted) and will range in height from 4-8 storeys (as permitted) and will be c.1.81m higher.***
- ***The removal of the permitted basement car park and its replacement with a semi basement under Blocks D, E and a portion of the communal open space. Associated redesign and allocation of car, cycle and motorcycle parking spaces at semi-basement and surface level.***
- ***All associated works to accommodate the proposed changes, including alterations to permitted open space, bin stores, ESB Substation locations and associated ancillary works.***

The remainder of the permitted development, including permitted Blocks F and G, the permitted public open space, permitted vehicular and pedestrian/cyclist accesses, site services and all other works will remain as permitted under Reg Ref 313289-22. The proposed amendments will result in a revised total of 472 no. units (comprising 0 no. Studios, 230 no. 1-beds, 211 2-beds, and 31 no. 3-beds) along with a revised total of 217 no car spaces, 829 no. cycle spaces and 8 no. motorbike spaces at semi-basement and surface level.

The permitted Blocks F and G are due to commence in Q4 of 2024. Blocks A to E are the subject of this amendment. It is proposed to retain the permitted uses on site which is primarily residential use. Block A also includes a permitted retail/ café and creche.

The proposed amendment will provide an additional 29 units and will amend the mix of 60 units to provide more 1 and 3 bed units within the development, with a corresponding reduction in 2 bed units.

Other internal alterations in blocks A to E are proposed which will change the overall layouts with minor changes to the footprint of the building and alterations to the elevations.

The total number of units in blocks A to E proposed is 334 as a result of this amendment, an increase from 305 no. units. When considered in conjunction with blocks F and G the total number across the site is 472 no. units which was the quantum originally applied for.

The most significant alteration is the replacement of the basement, and associated reduction in car parking, with a semi-basement under blocks D, E and the communal open space.

There is a slight variation to the heights of all blocks compared to the permitted development because of these amendments. The most significant change is in the centre of the site to blocks D and E which will increase in height by 1.81m each to accommodate the semi-basement.

	Original application	Permitted	Proposed
No. of units	322no. residential units as follows: <ul style="list-style-type: none"> - 20 no. studio (6%) - 106 no. 1-bed (33%) - 187 no. 2-bed (58%) - 9 no. 3-bed (3%) 	305no. residential units as follows: <ul style="list-style-type: none"> - 3 no. studio (1%) - 89 no. 1-bed (29%) - 204 no. 2-bed (67%) - 9 no. 3-bed (3%) 	334 no. residential units as follows: <ul style="list-style-type: none"> - 0 no. studio (0%) - 151 no. 1-bed (45%) - 153 no. 2-bed (46%) - 31 no. 3-bed (9%)
Parking	Car parking c.249 basement level Cycle parking c.650 Motor bike parking 5		Car parking: c.168 Cycle parking: c.829 Motor bike parking: c. 5
Ancillary	Creche: 445.76sqm + 118sqm external Café: 99sqm Internal Communal Amenity space: 511sqm Public Open Space: 486sqm plaza Communal Open Space 3,016sqm		Creche: 399.2 sqm + 178.7sqm external Café: 105sqm Internal Communal Amenity space:357sqm Public Open Space: 668sqm plaza Communal Open Space: 3,122sqm

Table 1. Original, Permitted and Proposed Housing Mix (Units A-E)

	Original application	Permitted	Proposed
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No. of units	472 no. residential units as follows: 32 no. studio (7%) 198 no. 1-bed (42%) 233 no. 2-bed (49%) 9 no. 3-bed (2%)	443no. residential units as follows: 3 no. studio (1%) 169 no. 1-bed (38%) 262 no. 2-bed (59%) 9 no. 3-bed (2%)	472 no. residential units as follows: 0 no. studio (0%) 230 no. 1-bed (49%) 211 no. 2-bed (44%) 31 no. 3-bed (7%)
Ancillary	Creche: 445.76sqm + 118sqm external Café: 99sqm Internal Communal Amenity space: 511sqm Public Open Space: 6165sqm or 22.55% Communal Open Space:3,280sqm		Creche: c.399.2 sq.m with 178.7sqm outdoor space Café: 105sqm Internal Communal Amenity space:357sqm Public Open Space:6,334sqm or 23.16% Communal Open Space: 3,386sqm

Table 2. Original, Permitted and Proposed Housing Mix (Units A-G)

The proposed amendments are sub-threshold development; however, it was deemed appropriate to prepare an addendum to the EIAR which had submitted with the parent permission ABP Reg Ref 313289-22, in line with good planning practice. The proposed amendments do not impact the relevant classes of development for EIA thresholds. Accordingly, an EIA is not mandatory for the proposed amendments.

Each element of the environment assessed in the EIAR accompanying the parent application is addressed below for completeness. A qualified specialist for each of the individual chapters originally assessed as part of the EIAR for the Parent Permission ABP Reg Ref 313289-22 has been re-engaged to assess the proposed amendments and to determine, in their professional opinion, whether the amendments materially impacted the findings of the original EIAR.

The full list of the qualified specialists engaged to assess the impact of the proposed amendment, as per the individual chapters of the EIAR for the parent permission is listed in Appendix A of this report. Details of the competency, qualifications and experience of the authors is also outlined in Appendix A.

REFERENCE LEGISLATION AND GUIDELINES

This Report has been prepared with regard to the following legislation and guidance:

- Planning and Development Act 2000 (as amended) ('the 2000 Act').
- Planning and Development (Amendment) (Large-scale Residential Development) Act 2021.
- Planning and Development Regulations 2001 to 2024 ('the Planning and Development Regulations').
- Guidelines on Information to be Contained in an Environmental Impact Statement (EPA 2002).
- Study on the Assessment of Indirect & Cumulative Impacts as well as Impact Interaction (DG Environment 2002).
- Environmental Impact Assessment (EIA), Guidance for Consent Authorities Regarding Sub-Threshold Development (DoEHLG 2003).
- EIA Directive 85/337/EC (as amended by Council Directive 97/11/EC, Directive 2003/35/EC, Directive 2009/31/EC, Directive 2011/92/EU and Directive 2014/52/EU).
- European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) – transposed Directive 2014/52/EU into Irish law.
- 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 Screening (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).
- Guidelines on the information to be contained in Environmental Impact Assessment Reports (EPA 2022).
- Environmental Impact Assessment Screening Practice Note 2021 (Office of the Planning Regulator).

SITE LOCATION & CONTEXT

The subject site is located within Dublin City Council administrative area. The development site is located along the Swords Road (R132), Dublin 9, which provides access to the site. Highfield Hospital is to the immediate south, also fronting onto the Swords Road.

There are vacant lands owned by Dublin City Council and Whitehall GAA pitches to the north of the site, facing onto the Swords Road and Collins Avenue. Beech Lawn Nursing home is located to the rear (east) of the site, accessed from Grace Park Road via High Park.

The subject site is not within an Architectural Conservation Area (ACA) and does not contain any protected structures directly on site.

Swords Road is a wide north-south artery into Dublin City, which features Quality Bus corridors and part-segregated cycle lanes. Directly across the Swords Road from the subject site is a strip of neighbourhood level mixed-use activities. Similarly, to the north of the site on Collins Avenue, a 5-minute walk, is another neighbourhood level centre for the Whitehall area.

The subject site is located a 15-minute walk from the main campus of Dublin City University, a major centre of higher education and employment in the area. The nearest large-scale retail and services is 20 minutes walking distance to the northwest in Santry. The Omni Park Shopping Centre and the neighbouring industrial estate are large scale employers in the area.

Port Tunnel

The site formed part of the site compound works for the construction of the Dublin Port Tunnel and the tunnel is located beneath the site on a line north/south. The proposed layout has been designed with the proposed public open space and only Block G, located to the southern corner of the site, over the Port Tunnel.

A Tunnel Impact Assessment (prepared by AGL Consulting Engineers and independently assessed by Byrne Looby) confirms that that the construction of the proposed development does not exceed the surcharge limit on the tunnels and will have no detrimental impact on the lining of the tunnel.

Accessibility

The site is located on an existing QBC and will have the benefit of a Bus Connect Route. It is also within c.15 minutes cycle of Dublin City Centre and is within c.15 minutes walk of DCU, c.30 minutes walk of Beaumont Hospital.

The site is within 300m of approximately 13 different bus stops serving over 25 different bus routes. These routes will be further improved as a result of BusConnects. In addition to this the new cross city Metrolink is within c. 28 minutes of the site. As part of the BusConnects network it is proposed to improve cycle routes throughout Dublin. Currently the site has the benefit of a cycle route along the Swords Road. As set out above there are excellent pedestrian links existing within the area. This will be further improved through the delivery of the permitted crossroad junction granted under SHD 313289-22.

As set out above there is a wide range of existing services surrounding the site including neighbourhood centres, schools, GAA pitches and parks. In addition to this the site is within walking distance of DCU and Beaumont Hospital which are significant employers in the area. Further afield, Dublin City Centre is within a 15 minute cycle of the site.

DESCRIPTION OF PERMITTED AND PROPOSED AMENDMENTS

Development Permitted under ABP Reg. Ref.: 313289-22

Permission was granted on the 17th November 2022 for a Strategic Housing Development consisting of the following (as described in the site notices):

Eastwise Construction Swords Ltd intend to apply to An Bord Pleanála for permission for a strategic housing development at 'Hartfield Place', Swords Road, Whitehall, Dublin 9. The site is bound to the west by Swords Road, to the south by Highfield Hospital, to the north by vacant land and GAA pitches, and to the east by Beechlawn Nursing Home. To facilitate water services and road infrastructure connections/upgrades the application site red line extends to include a portion of Swords Road (including junctions with Iveragh Road and Collins Avenue), High Park and Grace Park Road (including junctions with Grace Park Heights and Sion Hill Road).

The proposed development will consist of the construction of 7 no. apartment blocks, ranging in height up to 8 storeys (over single level basement). This will provide 472 no. residential units (comprising 32 no. studios, 198 no. 1 beds, 233 no. 2 beds, and 9 no. 3 beds). All with associated private balconies/terraces to the north/south/east/west elevations. A creche (c.445.76sqm), a café unit (c.99sqm), and internal residential amenity space (c.511sqm), providing a sun lounge, gym, screening room, lounge, and meeting rooms, will also be provided.

The proposed development will include 337 no. car parking spaces, 982 no. cycle parking spaces, and 14 no. motorcycle spaces at basement/surface levels, public open space, and communal open spaces at ground and roof levels.

Vehicular access from Swords Road will be provided with associated works/ upgrades to the existing public road layout, junctions, bus lane and footpath network to facilitate same. Two pedestrian/ cyclist only access are provided from the Swords Road as well as a separate pedestrian and cyclist access to the southwest which also facilitates emergency vehicular access.

The application will include for all development works, landscaping, ESB substations, plant areas, bin storage, surface water attenuation, and site services required to facilitate the proposed development. Upgrades to the Irish Water network to facilitate the development are also proposed.

This decision was subject to conditions which resulted in the reduction of the permitted number of units to 443 no. apartments.

Proposed Amendments/Alterations to the Permitted Development

The proposed alterations/amendments to the residential development permitted under ABP Reg. Ref.: 313289-22 are described as follows:

The development will amend permitted Strategic Housing Development (SHD) Reg. Ref. ABP-313289-22 and will consist of alterations to 5 no. (Blocks A - E) of the 7 no. permitted apartment blocks. The amendments will increase the total number of residential units by 29, resulting in an overall total of 334 units in Blocks A - E. The revised residential mix in Blocks A - E will comprise 150 no. 1-beds, 153 no. 2-beds and 31 no. 3-bed apartments. Alterations will include the following:

- **Block A will provide 57 no. apartments (+6 over permitted) and will range in height from 5-8 storeys (as permitted) and will be c.0.52m lower overall. Block A will include a revised creche (c.399.2 sq.m with 178.7sqm outdoor space), café (c.105 sq.m), and communal amenity space (c.357 sq.m).**
- **Block B will provide 76 no. apartments (+10 over permitted) and will range in height from 5-6 storeys (as permitted) and will be c.0.17m higher.**
- **Block C will provide 53 no. apartments (-1 below permitted) and will range in height from 4-6 storeys (as permitted) and will be c.0.4m lower.**
- **Block D will provide 79 no. apartments (+3 over permitted) and will range in height from 7-8 storeys (as permitted) and will be c.1.81m higher.**
- **Block E will provide 69 no. apartments (+11 over permitted) and will range in height from 4-8 storeys (as permitted) and will be c.1.81m higher.**
- **The removal of the permitted basement car park and its replacement with a semi basement under Blocks D, E and a portion of the communal open space. Associated redesign and allocation of car, cycle and motorcycle parking spaces at semi-basement and surface level.**
- **All associated works to accommodate the proposed changes, including alterations to permitted open space, bin stores, ESB Substation locations and associated ancillary works.**

The remainder of the permitted development, including permitted Blocks F and G, the permitted public open space, permitted vehicular and pedestrian/cyclist accesses, site services and all other works will remain as permitted under Reg Ref 313289-22. The proposed amendments will result in a revised total of 472 no. units (comprising 0 no. Studios, 230 no. 1-beds, 211 2-beds, and 31 no. 3-beds) along with a revised total of 217 no car spaces, 829 no. cycle spaces and 8 no. motorbike spaces at semi-basement and surface level.

All other elements within Hartfield Place remain the same as the permitted scheme including public open space, blocks F and G, and the access routes into the site.



Figure 3 Site Layout Plan indicating areas the subject of changes proposed. Source: CWOB, 2024.

Please refer to the drawings submitted as part of this planning application by CW O'Brien Architecture for further information in relation to the proposed amendments.

ENVIRONMENTAL IMPACT ASSESSMENT

Population and Human Health

The EIAR submitted with the parent application identified that the development is unlikely to result in any significant adverse impacts on human health and safety considerations once completed and operational.

The proposed amendments do not result in any additional, significant negative environmental effects or impacts compared with the EIAR for the original SHD proposal. This amendment replacing the basement with a semi basement and the alteration to the number and mix of units, with the increase in the number of units by 29 (resulting in the same number of units as originally proposed for the parent application), will have minimal impacts on the existing environment.

The replacement of the basement with a reduced semi-basement is considered to be a positive benefit to the population and human health of the future occupants and of wider area. This will significantly reduce the number of truck movements and amenity impacts (e.g. noise, dust etc.) at construction phase. At operational phase, the reduced parking will reduce the number of cars entering and egressing this development and will facilitate a positive modal shift to sustainable transport use by future occupants of the scheme, thereby positively impacting the wider environment compared to the original scheme. There will also be an additional benefit to future residents with the omission of the basement car park facilitating more significant planting (e.g. trees) in the communal open space.

The proposed amendments to Blocks A to E will not significantly alter the established impact from the construction and operation of these blocks given the blocks are to be sited in the same locations, with the same general footprints and broadly similar heights.

Overall it is considered that there will be no additional negative impact on the overall population and human health of the proposed Hartfield Place development or on the wider area, and overall there will be a slight positive impact compared to the original proposed development as detailed above.

Biodiversity

The biodiversity chapter prepared as part of the EIAR submitted with the parent application assessed the development's impacts on local habitats. JBA Ecology have continued to survey the site and there is an updated Ecology note in Appendix G of this Addendum and Appendix C. The Predicted Impacts for the construction phase in the original EIAR identified that the removal of vegetation could affect wildlife and set out a series of mitigation measures. It found that subject to these mitigation measures and the implementation of the landscape masterplan for the operational phase would result in *"the predicted impact during the construction phase is assessed to be of negligible impact."*

The Predicted Impacts for the Operational Phase also set out a series of mitigation measures which were incorporated into the landscape masterplan. It was found that there was *"no significant residual impact"* for the operational phase.

As set out in the conclusion of Appendix G below, which includes details of updated survey results, *"Therefore, it can be concluded that, given the proposed amendments are similar in nature and extent to that permitted, the existing previously listed mitigations and conclusions remain to be effective measures in the protection of local ecological species and features of note."*

Land, Soil and Geology

An Assessment of the Likely Impact of the Development on land, soils and the geological environment in the original EIAR including a Tunnel Impact Assessment dated February 2022 by AGL Consulting and the Swords Road Ground Investigations report dated August 2020 carried out by Ground Investigations Ireland along with a review of information available from the Geological Survey Ireland (GSI) was undertaken for the EIAR that was submitted with the parent application. The Tunnel Impact Assessment has been updated as part of this amendment application and the revised findings are submitted with this application.

The Predicted Impact of the Construction Phase as set out in the original EIAR stated that it was *“limited to the excavations required to construct the foundations and install the proposed works. If mitigation elements are implemented, then the risk of impact is negligible.”* The Predicted Impacts for the operation phase are *“negligible on the surrounding soils, geology and groundwater environment.”*

The proposed amendments, due to the reduction of the amount of excavation due to the omission of the basement and replacement with a semi-basement, would alter the impacts of the development on the soil and geological environment positively. Consequently, there will be no additional impacts on soils and geology because of the amendments, and no additional mitigation measures are proposed. Please refer to Appendix E, from PUNCH Consulting Engineers.

Hydrology and Water Services

Following an assessment of the area the Predicted Impacts for the Construction Phase in the original EIAR confirmed that: *“no predicted significant impacts arising from the construction phase due to the temporary nature of construction and the expected use of portable or temporary toilets only, which will be contracted out to an authorised disposal agent. A wide range of mitigation measures have been specified for the construction and operational phases of the project. These mitigation methods seek to ensure that construction and operational discharges are controlled to prevent potential pollution impacts to all receiving surface water systems.”*

The Predicted Impacts for the Operational Phase confirmed that: *“No negative residual impacts are anticipated with the implementation of the construction and operational mitigation measures as stated”.*

The proposed amendments do not materially alter the impacts of the development of the hydrological or hydrogeological environment. Consequently, there will be no additional impacts on water and hydrology of the receiving environment as result of the amendments, and no additional mitigation or monitoring measures are required. Please refer to Appendix E, from PUNCH Consulting Engineers.

Noise and Vibration

The original EIAR identified potential noise and vibration impacts at the construction and operation phases. It also set out a series of Mitigation Measures for both the Construction and Operational Phase of the development. This Chapter sets out the Residual Effects of the proposed development once these mitigation measures are implemented as follows:

“With the incorporation of the above mitigation and CEMP in place, construction noise are likely to be a Temporary Moderate Adverse effect, which is not considered to be significant. Construction vibration at nearby sensitive receptors are well below the limits and not significant. The construction traffic noise impacts are very low and also not significant.”

With suitable external building fabric (including glazing and ventilation), the site is considered to be suitable for the proposed residential use."

The proposed amendments will result in a development that is similar in quantum and extent and will not give rise to any significant additional impacts at construction or operational phases in relation to noise. It will not result in any material changes to any identified potential or significant impacts that require consideration of additional mitigation or monitoring measures. Please refer to Appendix B, from Traynor Environmental.

Climate and Air Quality

The EIAR identified potential air, dust and climatic impacts at the construction and operational phases. It also included Mitigation Measures to address any potential impacts at Construction and Operational Phases. The Residual Impacts of both phases following mitigation are found to be as follows:

"Construction Phase

Air Quality

When the dust management measures detailed in the mitigation section of this Chapter (Section 9.7) are implemented, fugitive emissions of dust from the site will be neutral effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error. Climate Impacts to climate during the construction phase are considered imperceptible and therefore residual impacts are not predicted. However, due to short-term and temporary nature of these works, the impact causes noticeable changes in the character of the environment but without significant consequences.

Operational Phase

Various elements associated with the construction phase of the proposed development have the potential to impact local ambient air quality, however the potential construction phase impacts shall be mitigated as detailed in Section 9.7 above to ensure there is a minimal impact on ambient air quality for the duration of all construction phase works. It is predicted that the operational phase of the development will not generate air emissions that would have an adverse impact on local ambient air quality or local human health. Air emissions can be further reduced by using operational mitigation measures and detailed in Section 9.7. The results of the air dispersion modelling study indicate that the impacts of the proposed development on air quality and climate is predicted to be imperceptible with respect to the operational phase for the long and short term."

The proposed amendments are similar in nature to the permitted and will not give rise to any additional impacts at the construction or operational phases and will not result in any material changes to any identified potential or significant impacts that require consideration or additional mitigation or monitoring measures. Please refer to Appendix B, from Traynor Environmental.

Landscape and Visual Impact

A Landscape and Visual Impact Assessment (LVIA) chapter was prepared as part of the EIAR submitted with the parent application. The findings regarding landscape/townscape impact were as follows:

"In terms of Landscape / Townscape impacts it is considered that the proposed development will not result in a marked increase in the intensity and scale of the development when compared to the previously permitted scheme on site. Critically it will not push a threshold whereby the development appears over-scaled or inappropriate to the surrounding urban

fabric, which already contains substantial scale institutional facilities such as a Hospitals, Nursing Homes and schools closely aligned to major north city transport routes. Thus, the significance of Landscape / Townscape impact is deemed to be Moderate and Positive relative to the current brownfield scenario and the effects of the proposed development Slight-imperceptible relative to the extant permission.

Nine viewpoints were used for the purposes of the visual impact assessment with verifiable views prepared for each of them. In several instances, the proposed development is not readily visible from the particular viewpoint and the significance is Imperceptible by default (VP3, VP4, VP7). In the case of VP6, which is relatively close to the eastern side of the development, the only visible block is Block F.

For the remaining viewpoints (VP1, VP2, VP2a, VP3a and VP5) the significance of visual impact is deemed to be Slight-imperceptible for very similar reasons in each case. These include only a very minor increase in the scale and intensity of the permitted development from the proposed additional upper levels. A change that although perceptible has little material consequence for visual amenity or a sense of scale conflict and/or overbearing relative to the previously permitted development or in its own right.

OVERALL SIGNIFICANCE OF IMPACT

Overall, it is considered that the proposed development is of an appropriate scale to its receiving environment and will not result in significant and negative impact once complete. Instead, the contribution of the proposed development is deemed to be a positive one in the context of the urban fabric of this area.”

The proposed alterations to Blocks A to E would not materially alter the conclusions of the original landscape/townscape impact assessment. The amended development would also retain the positive design impacts identified in the original assessment.

In conclusion, it is considered that the proposed amendments to the permitted development would not result in any additional, significant townscape or visual impacts in either the construction or operation phases compared to the original proposal, and no additional mitigation or monitoring measures are required. Please see the appendix D confirming same by Macroworks.

Traffic and Transportation

A Traffic and Transport Assessment (TTA) was undertaken and submitted with the parent application and informed the Traffic/Transportation chapter of the EIAR. The assessment quantified the existing and proposed transport environment and detailed the results of assessment work undertaken to identify the potential level of transport impact generated as a result of the development. The Predicted Impacts following mitigation measures set out in the original EIAR stated the following:

“Construction Phase

The development during construction is anticipated as generating a low level impact on the road network in comparison to the baseline traffic and with the preparation of a detailed CMP to manage construction traffic no residual impacts are anticipated.

Operational Phase

The development once constructed is anticipated as generating a low level impact on the road network in comparison to the baseline traffic and with the preparation of a Car Parking Strategy, Mobility Management Plan and Site Servicing and Operation Plan managing traffic

and transportation impacts.”

The proposed amendments, and in particular the omission of the basement and replacement with a semi basement will result in significantly reduced excavation at construction stage and reduced car parking at operational stage. This will result in reduced traffic impacts than previously predicted due to the reduced traffic load on the road network both at Construction Stage (due to reduced earthworks and associated traffic movements) and at Operational Stage (due to reduced parking provision and promotion of alternative sustainable transport modes). The overall impact of these amendments will be positive compared to the EIAR on the original scheme. AS a result no additional mitigation or monitoring measures are required. Please refer to Appendix E, PUNCH Consulting Engineers.

Material Assets

The EIAR submitted with the parent application included an assessment of the likely impact of the development on the existing services and material assets of the subject site and its surrounding environment. The Predicted Impacts were stated as follows:

“Construction Phase

Taking into account the above-mentioned mitigation measures, which are designed to avoid and prevent any adverse issues arising during construction, any predicted effects on the surface water, wastewater, water supply, telecommunications, natural gas and electricity supply services during the construction phase are considered to be brief-temporary in nature and imperceptible, where supply is unavoidably disrupted to facilitate the construction phase.

Operational Phase

As surface water drainage, foul water drainage and watermain design has been carried out in accordance with the relevant guidelines and Irish Water have provided a Confirmation of Feasibility, the impacts are neutral, imperceptible and long term.”

The proposed amendments are similar in nature and extent to the permitted development and will not give rise to any additional negative impacts at the construction or operational phases. They will not result in any material changes to any identified potential or significant impacts that require consideration of additional mitigation or monitoring measures.

Waste Management

The Waste Management chapter of the original EIAR addressed the subject of waste management for the proposed development. Waste management addressed both the construction and operational phases of the project. A separate site-specific Resource and Waste Management Plan and an Operational Waste Management Plan were prepared for the SHD development. This proposal will not alter these plans materially. The Predicted Impacts were as follows:

“The implementation of the mitigation measures outlined in Section 13.7 will ensure that a high rate of reuse, recovery and recycling is achieved at the development during the construction phases as well as during the operational phase. It will also ensure that European, National and Regional legislative waste requirements with regard to waste are met and that associated targets for the management of waste are achieved.

Construction Phase

A carefully planned approach to waste management as set out in Section 13.7 and adherence

to the RWMP during the construction phase will ensure that the impact on the environment will be short-term, neutral and imperceptible.

Operational Phase

During the operational phase, a structured approach to waste management as set out in Section 13.7 will promote resource efficiency and waste minimisation. Provided the mitigation measures are implemented and a high rate of reuse, recycling and recovery is achieved, the predicted impact of the operational phase on the environment will be long-term, neutral and imperceptible.”

The proposed amendments are considered similar in nature to the original scheme assessed in the EIAR and will not give rise to any additional impacts at the construction or operational phases. It will not result in any material changes to any identified potential or significant impacts that may require additional mitigation or monitoring measures.

The principle consequence associated with the proposed amendment is the reduction of bulk excavations associated with elimination of the basement and the resulting reduced extents/volumes associated with the semi-basement. This will result in a greatly reduced quantum of bulk excavations and hence will represent a positive impact in terms of waste impact at construction stage.

Please refer to Appendix B, Traynor Environmental.

Cultural Heritage and Archaeology

The EIAR carried out an assessment of the site and surrounding areas for any archaeological cultural heritage in the area. It identified under the Predicted Impacts the following:

“Construction Phase

The study area does not include any recorded archaeological monuments and the potential for archaeological remains to exist at the site are very low. As a result of this there are no predicted impacts on the cultural heritage landscape by the proposed development.

Operational Phase

There will be no impact on the cultural heritage landscape during the operational phase of the proposed development.”

The proposed amendments are similar to those of the permitted development, and the reduced level of excavation will ensure that there are no significant additional impacts at the construction or operational phases and will not result in any material changes to any identified potential or significant impacts that require consideration of additional mitigation or monitoring measures. Please refer to Appendix F, John Purcell Archaeology.

A DESCRIPTION OF ANY SIGNIFICANT EFFECTS TO THE EXTENT OF THE INFORMATION AVAILABLE ON SUCH EFFECTS OF THE PROPOSED DEVELOPMENT ON THE ENVIRONMENT

This includes information available on the environment including:

- (a) The expected residues and emissions and the production of waste, where relevant, and
- (b) The use of natural resources, in particular soil, land, water and biodiversity.

It is expected that there will be residues/emissions during the construction stage associated with the development works proposed, which include ground preparation works, development of site infrastructure, construction of buildings and hardstanding areas and landscaping of the site including open soft landscaped areas.

Standard mitigation measures will be employed and monitored as set out in the Resource and Waste Management Plan, the EIAR of the parent permission and as required by conditions 2, 17, 21 and 22 of the grant of permission. As such residues and emissions are not considered likely to have potential to cause significant effects on the environment.

There will be some waste materials produced in the construction of the proposed scheme which will be disposed of using licensed waste disposal facilities and contractors. As is standard practice the scale of the waste production in conjunction with the use of licensed waste disposal facilities and contractors will not cause concern for likely significant effects on the environment. Again, this is set out in the Resource and Waste Management Plan from the parent permission which provided detail regarding the methodologies employed for the control, management, monitoring and disposal of waste from the site.

There will be no large-scale use of natural resources. The main use of natural resources will be land. The subject lands currently under construction for the permitted development under ABP Reg Ref 313289-22.

Other resources used will be construction materials which will be typical raw materials used in the construction of residential developments. The scale and quantity of the materials used will not be such that would cause concern in relation to significant effects on the environment. The construction or operation of the scheme would not use such a quantity of water to cause concern in relation to significant effects on the environment. The use of natural resources in relation to the proposed development is not likely to cause significant effects on the environment.

The proposed development for the purpose of this assessment relates only to Blocks A to E of the permitted development. Blocks F and G, the public open space, access routes and general layouts remain as permitted. The footprint and elevations will be altered slightly for Blocks A to E, along with the replacement of the permitted basement with a semi-basement however, the overall scale and massing of these blocks is similar to the permitted development.

The potential impacts are assessed on the basis of the proposed amendment development, and cumulatively with the permitted development it is sought to amend. In this regard, any potential impact is considered unchanged due to the nature of the amendments, the limited impact it will have on the development as a whole and the similar scale and extent of buildings.

Compilation of The Above Information Taking Schedule 7 Criteria, As Appropriate, Into Account

Characteristics of Proposed Development	
The size of the proposed development.	The proposed development seeks to amend previously permitted development and relates to amendments to Blocks A to E. The proposal will replace the basement with a semi basement and changes to the internal layouts proposed will result in slight alterations to the footprints of these blocks. However, the overall scale and massing of the proposed development will remain similar to that of the permitted scheme. The remainder of the permitted development, including access points, Blocks F and G, and the public open space will remain unchanged from the permitted development.
The culmination of other proposed development.	This site forms part of the Hartfield Place Development as a whole. Cumulative impacts have been assessed on the basis of the proposed amendments alone, and cumulatively with the permitted development and other permitted developments in the area.
The nature of any associated demolition works	No demolition is proposed as part of the current application for amendments.
The use of natural resources, in particular land, soil, water and biodiversity.	<p>This site was formerly used as a compound for the Port Tunnel and part of the Port Tunnel runs under this site. Construction work for Blocks F and G including initial site clearance and some infrastructure has already been installed. As such it can be described as a site which was formerly modified or disturbed ground and which is now undergoing development with construction occurring on site.</p> <p>With the wider development site, as set out in the parent permission ABP Reg Ref 313289-22 there is high quality landscaping and planting proposed. This will be further improved upon as a result of the omission of the basement under the communal open space area. Appropriate attenuation and SuDs measures, some of which have been installed, will be incorporated into the development.</p>

	<p>No adverse significant impacts are expected to occur on the site or in the vicinity of the site through the use of natural resources as a result of the proposed amendments alone, or cumulatively with the permitted development and other permitted development in the area.</p>
The production of waste.	<p>Construction waste produced will be controlled, stored, and disposed of in a sustainable manner as per relevant environmental guidance. The Resource and Waste Management Plan submitted with the parent permission sets out the methodology for treatment of this waste.</p> <p>Operational waste for the residential development will be controlled by each household and dealt with by municipal services. An Operational Waste Management Plan for the entire development as submitted with the parent permission and as per the conditions of the parent permission will be implemented.</p> <p>No potential significant impacts are envisaged on the site or in the vicinity of the site because of the production of any waste associated with the proposed development alone or cumulatively with the permitted development and other permitted development in the area.</p>
Pollution and nuisances.	<p>The construction phase will create short term negative impacts particularly in terms of dust and noise.</p> <p>The Resource and Waste Management Plan submitted with the parent permission ensures that construction activities are properly controlled and mitigated.</p>
The risk of major accidents, and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge	<p>None.</p>

<p>The risks to human health (for example, due to water contamination or air pollution).</p>	<p>There is potential negative impact at construction stage in terms of noise and dust. However, these will be short term in duration and will be mitigated in accordance with an agreed Resource and Waste Management Plan and the mitigation measures identified in the parent permission.</p>
<p>Location of Proposed Development</p>	
<p>The existing and approved land use.</p>	<p>Construction is due to commence on site following the grant of permission by ABP under Reg Ref 313289-22. It is also a site which is zoned for residential development. This development amends Blocks A to E only with minor alterations to the footprint, elevations, internal layout and the omission of the basement. It is similar to that of parent permission in terms of scale and massing and will not alter the number of residential units originally applied for as part of the parent permission, albeit providing an uplift above that of the granted permission by 29 no. units.</p>
<p>The relative abundance, availability, quality, and regenerative capacity of natural resources (including soil, land, water, and biodiversity) in the area and its underground.</p>	<p>This is an allocated urban site that will be used as a high density residential development appropriate to its location. The provision of significant quantities of well landscaped open spaces will be positive for the biodiversity of the area. The extensive use of SuDs will also support the water management of the development.</p>
<p>The absorption capacity of the natural environment, paying particular attention to the following areas:</p> <ul style="list-style-type: none"> (i) wetlands, riparian areas, river mouths; (ii) coastal zones and the marine environment; (iii) mountain and forest areas; (iv) nature reserves and parks; (v) areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive and; (vi) areas in which there has already been a failure to meet the environmental quality standards laid down in legislation of the European Union and relevant to the project, or in which it is considered that there is such a failure; (vii) densely populated areas; 	<p>The site itself is not located within a wetland, river mouth, coastal zone, marine environment, mountain, forest, nature reserve, park, or historic/archaeologically significant location.</p> <p>It is worth noting that the permitted parent development will result in a change to land use which could affect the pattern of surface water run-off compared to the existing non-developed state. However, SUDS have been incorporated which ensures that the quantity and quality of the runoff will revert to a green field rate. The amendments to Blocks A to E, the subject of this application, will not result in a significant change to that of the permitted parent permission.</p>

(viii) landscapes and sites of historical, cultural, or archaeological significance.	The biodiversity chapter prepared as part of the EIAR by JBA Ecology for the parent permission assessed the development's impacts on local Habitats and a number of mitigation measures have been identified to address any negative impacts. These will be implemented in line with condition 2 of the grant of permission by ABP. This proposal will not alter these mitigation measures.
Types and characteristics of potential impacts	
The magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected).	<p>It is expected that the proposed amendments, either alone or cumulatively with the permitted development, will not have any environmental impact beyond its immediate environs.</p> <p>All construction activities are governed by a The Resource and Waste Management Plan and the mitigation measures set out in chapter 13 of the EIAR permitted under ABP Reg Ref 313289-22.</p>
The nature of the impact.	<p>The potential likely and significant impacts arising from the proposed amendment application will be similar or less than those of the permitted development.</p> <p>The impact of the construction of the parent permission will be typically those associated with a medium to large scale residential development in an area zoned for such use. The nature of the impacts is expected to be of a magnitude that would not be significant, adverse or permanent.</p> <p>The introduction of new buildings on this site will be typical of a residential area and will be significant, positive and permanent.</p>
The transboundary nature of the impact.	The proposed amendments, either alone or cumulatively with the permitted development will not give rise to any impacts that are trans frontier or transboundary in nature.
The intensity and complexity of the impact.	The potential impacts associated with the proposed amendments, either alone or cumulatively with the permitted development, are not considered to be complex in nature or of a magnitude/ intensity/ scale to be of significance.
The probability of the impact.	It is probable that the minor impact of noise and pollution during the construction phase

	will occur; however, construction works on zoned lands within the area are not unexpected or out of character and working hours will be limited to hours set by the planning conditions.
The expected onset, duration, frequency, and reversibility of the impact.	The impacts identified would occur during the construction phase, there are no significant negative impacts which are considered likely to occur during the operational phase of the proposed residential development. The frequency of impacts will vary throughout the construction phase; however, the impact is still not considered to be significant. The minor impacts associated with the construction phase such as noise, dust and traffic will be temporary and will not lead to residual impacts.
The cumulation of the impact with the impact of other existing and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment.	The subject site is zoned land designated for residential development. It also has a permitted development on the subject site, for 7 blocks of residential development with commercial space. The proposed amendment of 5 no. of these permitted blocks as proposed has been assessed both on the basis of the proposed amendments alone, and cumulatively with the permitted developments and other permitted development in the area. This has found that the overall the impact will be unchanged from the original EIAR.
The possibility of effectively reducing the impact.	Appropriate mitigations measures will be undertaken in accordance with condition 2 of ABP Reg Ref 313289-22 to ameliorate effects on the environment arising from the proposed development. Any mitigations measures to manage noise, dust and/or pollution during the construction phase will be based on standard best practice, policies, and guidance.

CONCLUSION

The development, as proposed to be amended, provides for residential development on site which is due to commence construction in Q4 2024 as part of the extant Hartfield Place permission. This amendment seeks to introduce amendments to the internal layouts of permitted Blocks A to E, the replacement of the basement car parking with semi basement parking, and associated reduction in excavation, and alterations to the façade with minor alterations to the footprint of the buildings. The remainder of the development, including Blocks F and G, the public open space and the access routes will remain unchanged from the parent permission.

The assessments undertaken as part of this EIA Addendum Report indicate that the amendments proposed will not result in any material change to the predicted impacts concluded in the original EIA. Consequently, significant adverse effects on the environment as a result of the amendments are not anticipated.

APPENDIX A

A full list of the qualified specialists engaged to prepare individual chapters of the EIAR for the parent permission along with details of the competency, qualifications and experience of the authors:

Chapter	Consultant	Lead Consultant	Qualifications
Introduction & Methodology	McGill Planning	Brenda Butterly	BSc Surv, MRUP, MAUD, MIPI, MRTPI
Alternatives			
Description of Development			
Population & Human Health			
Interactions			
Summary of Mitigations Measure			
Material Assets			
Biodiversity	JBA	Patricia Byrne	BSc (Hons), PhD, MCIEEM
Soils & Geology	PUNCH Consulting Engineers	Paul Casey	BE (Hons) Bachelor of Civil Engineering from UCD, 2006 CEng - Chartered Engineer with Engineers Ireland 2016 MIEI - Member of Engineers Ireland
Water Services		Paul Casey	
Traffic & Transportation		Paul Casey	
Waste Management		Paul Casey	
Noise	Traynor Environmental	Nevin Traynor	BSc. Env, H.Dip I.T, Cert SHWW
Air Quality & Climate Impact			
Landscape & Visual Assessment	Macroworks	Richard Barker	MLA, PGDip Forestry, BA Environmental, Corporate Member ILI
Cultural Heritage	John Purcell Archaeology Consultancy	John Purcell	BA(Hons)

Appendix B

RE: Hartfield EIAR Addendum

NT Nevin Traynor <nevin@traynorenv.ie>
To: Brenda Butterly
Cc: Sean Maguire

Mon 12/08/2024 22:51

S34 EIAR Addendum report.docx
232 KB

Start your reply all with:

Hi Brenda,





I have looked at the Addendum. I think it is fine and I have no changes.

Thanks

Nevin Traynor
BSc.Env, HDIP IT, Cert SHWW, Certified Env Noise Assessor
Traynor Environmental Ltd
Belturbet Business Park
Creenny
Belturbet
Co. Cavan

Mob: 087 7947793

tel: +353 (0) 49 9522236
email: nevin@traynorenv.ie
www.traynorenvironmental.com

Appendix C

RE: Hartfield EIAR Addendum

PB Patricia Byrne <Patricia.Byrne@jbaconsulting.ie>
To: Brenda Butterly; orla.canavan (orla.canavan@corcom.ie); Sean Maguire; Trevor Sadler

Thu 19/09/2024 14:19

Start your reply all with:

Hi Brenda,



I have reviewed the Biodiversity chapter for the Addendum EIAR and am happy with it.

Kind regards,

Patricia

Patricia Byrne MCIEEM
Principal Ecologist | Ecology

Mob: +353 85-2523290
DD: +353-1-9131901
My working days are Monday-Thursday

Appendix D

Re: Hartfield EIAR Addendum

RB

Richard Barker <richard@macroworks.ie>

To

Brenda Butterly

👍

🔄 Reply

🔄 Reply All

➡ Forward

📧

⋮

Wed 19/06/2024 17:19

🔗

If there are problems with how this message is displayed, click here to view it in a web browser.

Start your reply all with:

Wonderful, thank you!

Great, thanks for letting me know!

Wonderful! Thank you so much!

🔗 Feedback

Hi Brenda,


I hope you're keeping well.

I have reviewed the addendum TVIA text and I am happy with it.

Regards,

Richard Barker

Divisional Director - Landscape Architect



Macro Works Ltd.

Ground Floor, Hibernia House,

Cherrywood Business Park

Loughlinstown,

Ireland

D18 E440

Office: +353 1 230 3585

Mobile: +353 87 254 3310

Email: richard@macroworks.ie

www.macroworks.ie

Appendix E

232306: Hartfield EIAR Addendum

PC

Paul Casey | PUNCH <pcasey@punchconsulting.com>

To

Brenda Butterly

👍

🔄 Reply

🔄 Reply All

➡ Forward

📧

⋮

Sat 21/09/2024 10:15


Hi Brenda,

I'm happy with the EIAR Addendum content as assigned to PUNCH.

Just a few minor typos in the text, e.g. 'Traffic and Transportation' section, paragraph 1 should read "...**set out in the EIAR are as follows:**..."

Thanks,

Paul Casey
BEng CEng MIEI
Director



Carnegie House, Library Road, Dun Laoghaire, Co Dublin, A96 C7W7, Ireland

t: +353 1 271 2200 m: +353 85 825 1255 w: www.punchconsulting.com

Dublin | Limerick | Cork | Galway | Glasgow

f


in



X


@


Appendix F


Re: Hartfield EIAR Addendum


 John Purcell <jparchaeology@gmail.com>
To: Brenda Butterly

  Reply

 Reply All

 Forward






Tue 13/08/2024 11:58

Those changes are fine with me.

On Tue, Aug 13, 2024 at 10:24 AM John Purcell <jparchaeology@gmail.com> wrote:
I'll send that back to you later today.

Regards,

John Purcell

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www.jparch.ie

26

Appendix G

Ecology Note by JBA

Introduction

Previous surveying of the site at Hartfield Place, Swords Road was carried out by JBA Consulting between 2020 and 2022. The results of the surveys indicated the site had no notable flora, no protected mammal species, low bat roost potential and low bat foraging potential. The report indicates that during these surveys occasional seagull and a Buzzard *Buteo buteo* were noted flying overhead, and the site was absent of wintering bird usage, in particular a lack of Light-bellied Brent Goose *Branta bernicla* presence in either the site or the GAA pitch immediately to the north. Brent Geese were noted flying over the site on multiple occasions, often in a southwestern direction.

A series of additional follow-up surveys was conducted between February 2024 and July 2024 which included wintering bird and flight line surveys, three breeding bird surveys, a floral survey, an invasive species survey, two bat transect surveys and two bat static detector surveys.

Survey Methodology

The 2024 ecological walkover survey recorded habitats and protected species, following the methods outlined in the documents below:

Heritage Council (2011). Best Practice Guidance for Habitat Survey and Mapping (Smith et al. 2011¹). Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes (NRA, 2009²).

Aerial photographs and site maps assisted the survey. Habitats have been classified and described following Fossitt (2000³). Nomenclature for higher plants follows that given in The New Flora of the British Isles 4th Edition (Clive Stace 2019⁴). Identification of Irish plants generally follows Webb's An Irish Flora (Parnell and Curtis, 2012⁵).

Survey methodology for the wintering bird surveys was adapted from the Irish Wetland Bird Survey (I-Webs) methodology (BWI 2008⁶). All birds recorded within the site boundaries were enumerated, identified to species, had their activities performed described, and flight paths entering or leaving the site noted where possible. Birds encountered during the wintering and bird surveys were recorded along with their level of conservation concern as per Gilbert et al (2021).⁷

Survey methodology for bats followed those outlined in Bat Surveys for Professional Ecologists: Good Practise

¹ Smith, G.F., O'Donoghue, P., O'Hara, K., and Delaney, E. (2011) 'Best practice guidance for habitat survey and mapping', The Heritage Council: Ireland.

² NRA, 2009. Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes, National Roads Authority, available: <http://www.tii.ie/technical-services/environment/planning/Ecological-Surveying-Techniques-for-Protected-Flora-and-Fauna-during-the-Planning-of-National-Road-Schemes.pdf>

³ Fossitt, Julie A. 2000. A Guide to Habitats in Ireland. Heritage Council of Ireland Series. Kilkenny: Heritage Council/Chomhairle Oidhreachta

⁴ Stace, C.A. (2010) New Flora of the British Isles, 3rd ed. ed, Cambridge ; New York: Cambridge University Press.

⁵ Parnell, J. and Curtis, T. (2012) Webb's An Irish Flora [online], 8th ed, Trinity College Dublin, available: <http://www.corkuniversitypress.com/product-p/9781859184783.htm> [accessed 27 Feb 2018].

⁶ BWI (2008) I-WeBS Counter Manual: Guidelines for Irish Wetland Bird Survey Counters, BirdWatch Ireland and the National Parks and Wildlife Service of the Department of the Environment, Heritage and Local Government.

⁷ Gilbert, G., Stanbury, A., Lewis, L. (2021) - Birds of Conservation Concern in Ireland 4: 2020–2026

Guidelines (4th edition) Bat Conservation Trust (Collins 2023⁸). This resulted in two walking bat transects, and two static detectors deployed for a period of five days each.

A list of the surveys carried out in 2024 is seen in Table D-1:

Table D-1: List of surveys performed in 2024

Survey Date	Survey	Surveyors
Wintering Birds	30 th January 2024	Michael Coyle
Wintering Birds	19 th February 2024	Michael Coyle
Wintering Birds	07 th March 2024	Michael Coyle
Breeding Birds	25 th April 2024	Michael Coyle
Breeding Birds	20 th May 2024	Michael Coyle
Breeding Birds	14 th June 2024	Michael Coyle
Bat Transect Survey & Bat Static Detector Deployment	19 th June	Paricia Byrne and Matt Hosking
Invasive and Rare Plant Survey	03 rd July	Michael Coyle and Matt Hosking
Bat Transect Survey & Bat Static Detector Deployment	17 th July 2024	Michael Coyle and Patricia Byrne

Surveys Results

Habitats and Invasive Species Surveys

A resurvey of habitats and invasive species was conducted by JBA Ecologists Michael Coyle and Matt Hosking on the 3rd of July 2024.

Habitats

Habitats remained much the same as originally described in EIAR Biodiversity Chapter. However there were a few changes to habitat classification and distribution. One of the habitats that had previously been mapped as “GS1/ WS1 - Dry calcareous and neutral grassland /Scrub” is now reclassified as “GS2 - Dry meadows and grassy verges “. The scrub was removed from the classification as it was deemed that the presence of scrubby patches were no longer a distinct makeup of the habitat’s characteristics, while the type of grassland was updated due to its extent and growth characteristics. In addition, the area of ED3 – Recolonising Land has also begun develop floral diversity: with species now including Yorkshire Fog *Holcus lanatus*; Pendulous sedge *Carex pendula*; Red Clover *Trifolium Pratense*; Ribbed Melilot *Melilotus officinalis*; Bramble *Rubus fruticosus* agg.; False Oat-grass *Arrhenatherum elatius* ; Colt’s foot *Tussilago farfara*; White Clover *Trifolium repens*; Willowherb *Epilobium* sp.; Lesser Trefoil *Trifolium dubium*; Creeping Cinquefoil *Potentilla reptans*; Creeping Buttercup *Ranunculus repens*; Dandelion *Taraxacum* spp.; Ragwort *Jacobaea vulgaris*; Red Fescue *Festuca rubra*; Silverweed *Potentilla anserina*; Ribwort Plantain *Plantago lanceolata*; Creeping Thistle *Cirsium vulgare*; Self-heal *Prunella vulgaris*; Scarlet Pimpernel *Anagallis arvensis* and some Willow *Salix* sp. Saplings. A revised list of habitats is seen below and in habitat map in **Error! Reference source not found..**

Habitat Type	Fossitt Code
Buildings and artificial surfaces	BL3
Spoil and bare ground	ED2
Recolonising bare ground	ED3
Dry meadows and grassy verges	GS2
Scrub	WS1

⁸ Bat Surveys for Professional Ecologists: Good Practise Guidelines (3rd edition) Bat Conservation Trust

These changes are in labelling and classification alone and there are no ultimate alteration to the previous assessment.

Invasive species

Invasive species were mapped on the 3rd of July 2024 at the same time as habitats (listed in Table D-2 and shown in **Error! Reference source not found.**) and it was noted that Winter Heliotrope has become more widespread on the site than in the original survey. Stands of Cotoneaster *Cotoneaster* spp., Butterfly Bush *Buddleja davidii* and Sycamore *Acer pseudoplatanus* were also noted. These species were all present in the previous assessment, however their distribution has increased greatly since then.

One small stand of Virginia Creeper *Parthenocissus quinquefolia* was recorded in the south-east of the site during the updated survey, which was not previously present. This is also shown in **Error! Reference source not found.**

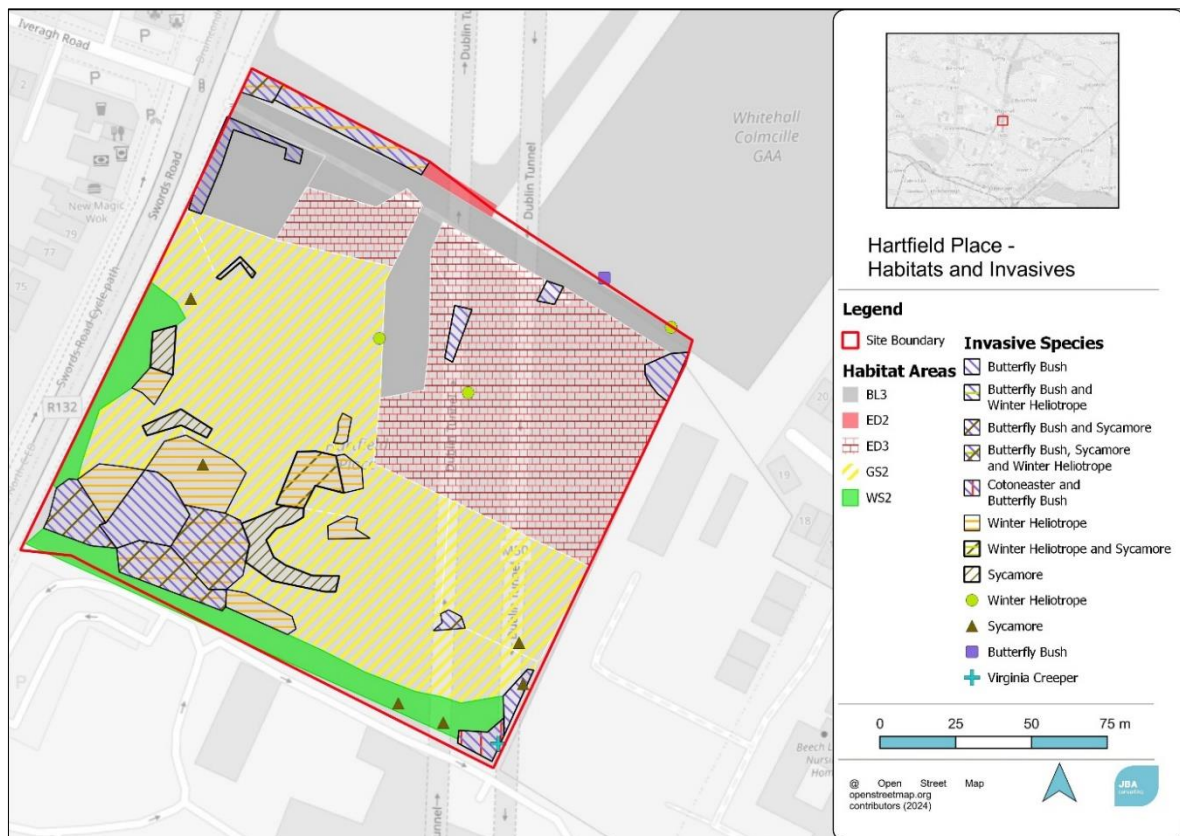


Figure D-1: Habitats and Invasive Species recorded in 2024

Winter Bird Surveys

A series of three flight line surveys were completed on the 30th of January, 19th of February and the 7th of March 2024. Point counts for the flight line surveys were carried out from the north of the site at the neighbouring GAA pitch, watching the skyline for the passage of Brent Geese, before carrying out a ground-roosting survey of wintering birds.

Flight Line Survey Results

On the 30th of January, a large flock of approximately 140 Brent Geese was seen flying in a south-western direction. These birds were estimated to be flying at a height of 15m - 20m (**Error! Reference source not found.** and **Error! Reference source not found.**).



Figure D-2: Brent Geese flying directly over the proposed site (30-01-2024)



Figure D-3: Approximately 140 geese flying in a south-western direction (30-01-2024)

On the 19th of February, another large flock of Brent Geese were seen flying in a western direction across the skyline (**Error! Reference source not found.**), however, these geese were flying south of the site beyond the local Bonnington Hotel (**Error! Reference source not found.**).



Figure D-4: A flock of geese (seen below the nets) flying eastwards on 19-02-2024. Gulls are seen above the net line.



Figure D-5: Geese flying beyond the Bonnington Hotel, far outside of the site boundary (19-02-2024)

On the third flight line survey (7th March 2024), Brent Geese were recorded flying northwards in the direction of the Ellenfield Park pitches. The flightlines recorded for the Brent Geese are shown in **Error! Reference source not found.** below

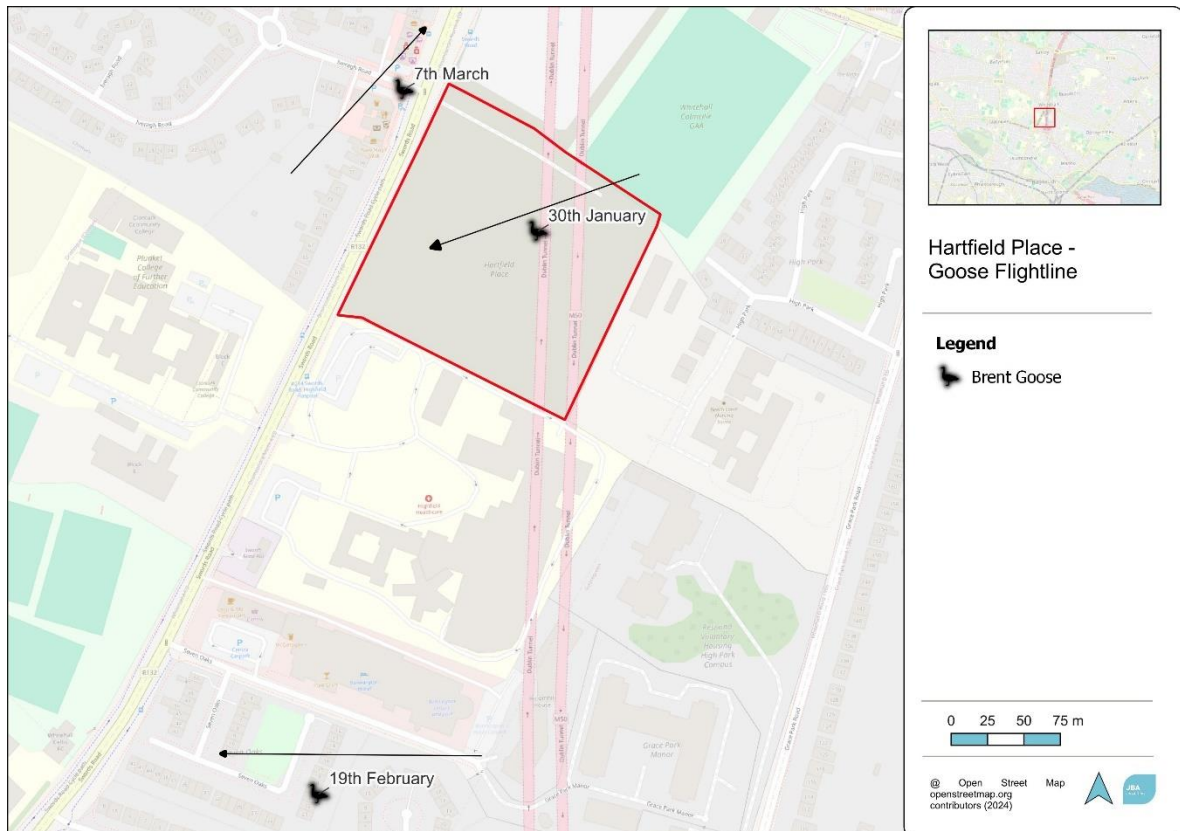


Figure D-6: Goose flightlines recorded during surveys

Following the completion of the flight line surveys, a survey for ground roosting winter birds was conducted within the main body of the site. During these surveys, Snipe *Gallinago gallinago* (Amber) were located within the boundary, with a single Snipe located in the south-eastern quarter of the site on the 30th of January, and two additional Snipes recorded in a western area of the site on the 7th of March 2024 (Figure D-7). Dunnock, Goldfinch, Linnet and Wren were also noted during these surveys, however these are not counted as wintering bird species (**Error! Reference source not found.**).

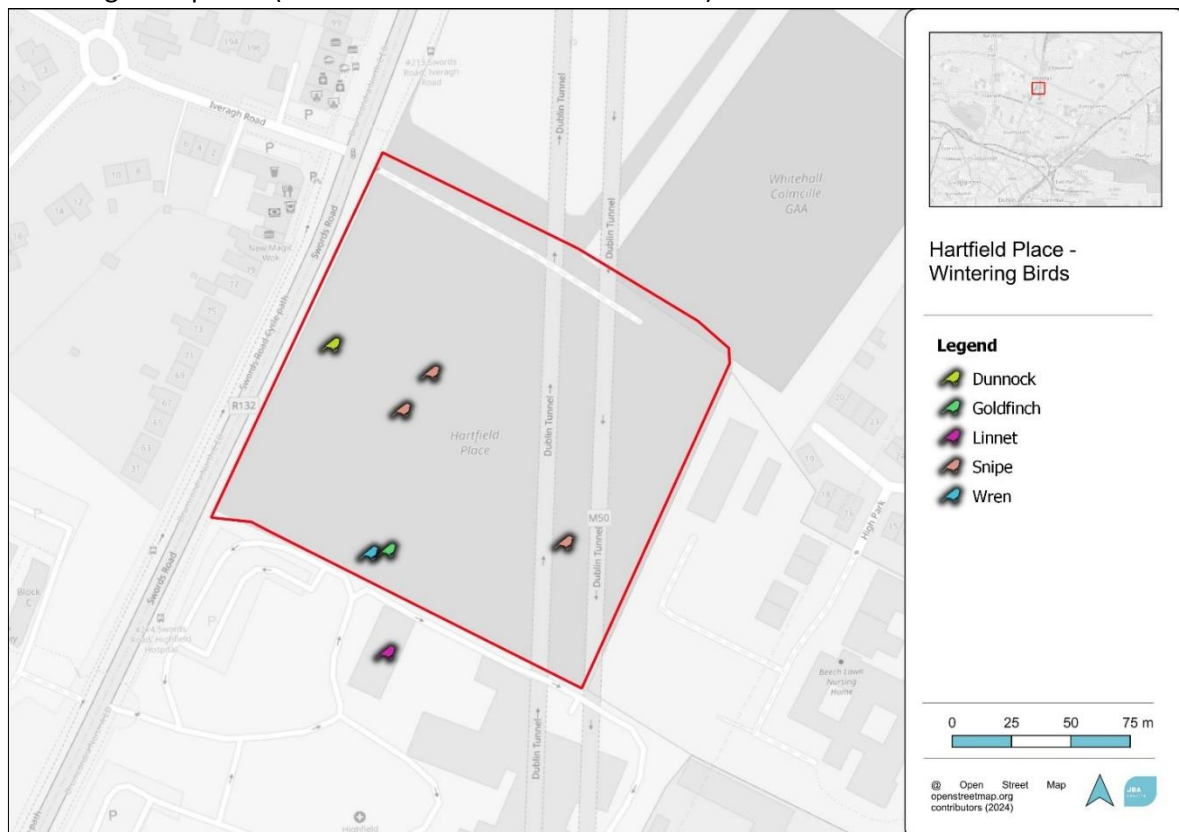


Figure D-7: Birds encountered during the winter 2024 walkover surveys

Breeding Bird Surveys

A series of breeding bird surveys were completed on the 25th of April, 20th of May and the 14th of June 2024. A total of 23 breeding birds were recorded within the site, with **Error! Reference source not found.** summarising the findings of these survey. Species encountered are listed below along with their categorisation of conservation concern following Gilbert et al.(2021).

Throughout the surveys, there was a consistent spread of Wren *Troglodytes troglodytes* (Green) located across the entirety of the site, and small flocks of Linnet *Linaria cannabina* (Amber) ranging from four to six birds often present in the south of the site, slightly off from the centre of the southern border. There was a high frequency of garden-birds located in the south-west of the site, with Wren; Blackbird *Turdus merula* (Green); Goldfinch *Carduelis carduelis* (Green); Linnet; Robin *Erithacus rubecula* (Green) and Blue Tit *Cyanistes caeruleus* (Green). Less common species that occurred within the site included Common Grasshopper Warbler *Locustella naevia* (Green) in the centre of the site, Meadow Pipit *Anthus pratensis* (Amber) in the west and the centre of the site, and Spotted Flycatcher *Muscicapa striata* (Amber) in the south-west of the site.

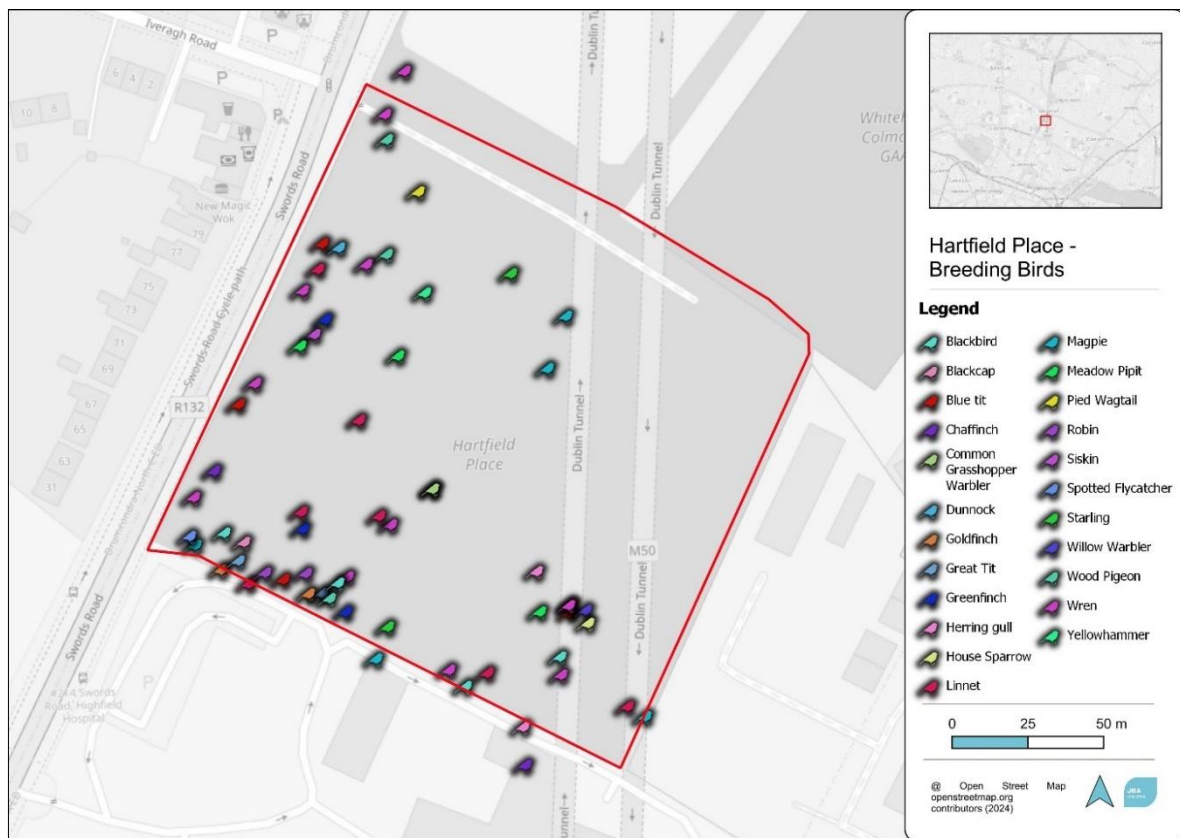


Figure D-8: The breeding birds encountered during 2024 surveys

Ground-dwelling Mammals

Surveys for mammals were carried out on the same dates as the breeding and wintering bird surveys. Results included recordings of small and medium sized mammal burrows of unknown species.



Figure D-9: Small mammal burrow located within the grassland



Figure D-10: Mammal burrow located within the grassland

Bats

Bat transect and static detector surveys were undertaken within the site on two occasions, the 19th of June and the 17th of July 2024.

During the first transect survey (19th June 2024), a singular Common Pipistrelle *Pipistrellus pipistrellus* was recorded within the site boundary and was seen flying repeatedly along the north-east border and venturing into the scrub north of the site. No other bats were recorded during this transect.

During the second transect survey (17th July 2024) there was slightly higher diversity present, with the additional recordings of Leisler's Bat *Nyctalus leisleri* and Soprano Pipistrelle *Pipistrellus pygmaeus* along the south border of the site.

The first static detector was deployed for five days between the 19th and 23rd of June 2024, and was located in the treeline along the south of the site. The second static was deployed between 17th-21st July 2024 and the static was located on a palm tree towards the centre of the site. Recorded numbers of bat passes for both of these periods are displayed in Table D-2 and Table D-3 overleaf. Overall, there was a very low usage of the site by bats. The locations of the static detectors, and of numbers of bats recorded during the transects are shown in **Error! Reference source not found.**

Table D-2: Bat static recordings from the first period of deployment

Species	19 th June	20 th June	21 st June	22 nd June	23 rd June	Total
Leisler's Bat	4	3	0	0	4	11
Common Pipistrelle	0	1	0	2	0	3
Soprano Pipistrelle	4	2	0	0	1	7
Total	8	6	0	2	5	21

Table D-3: Bat static recordings from the second period of deployment

Species	17 th July	18 th July	19 th July	20 th July	21 st July	Totals
Leisler's Bat	0	3	0	0	1	4
Common Pipistrelle	1	0	0	0	0	1
Soprano Pipistrelle	1	2	2	0	0	5
Total	2	5	2	0	1	10



Figure D-11: Bat passes recorded during the walking transect and the locations of the static detectors

Conclusion

Following the updated surveys of the site, aspects of the site that are unchanged in relation to the local ecology include:

- There continues to be regular flocks of Brent Geese passing overhead and outside the site in winter, but not landing within the site or its adjacent lands.
- There remains a small mammal hole within the earth bank in the centre of the site.
- The site continues to show low roosting and low foraging potential for bats within the site

As these listed ecological features remain the same, the proposed amendments are similar in nature and extent to that permitted. They will not give rise to any additional impacts at the construction or operational phases and will not result in any material changes to any identified potential or significant impacts that require consideration of additional mitigation or monitoring measures.

The updated surveys also highlighted some the changes within the site since the original surveying including:

- Some habitats have developed and spread, with some Fossitt classifications changing as the habitats have been allowed to develop.
- With the addition of breeding bird surveys, a more comprehensive list of bird species has been gathered.
- Wintering birds of note include Snipe.
- The invasive species that were present in the original survey period have begun to colonise and spread more extensively throughout the site

While some habitats have changed their Fossitt classification, and there has been an additional record of breeding birds, these results do not differ in a way that would require any alterations to existing restrictions and mitigations that are in place during the original assessment. This includes the removal of trees and scrub will be conducted outside of the bird nesting season (March to August inclusive). If this is not possible, an additional breeding bird survey by an appropriately qualified ecologist will be undertaken in advance of the works to ensure that there will be no impacts on nesting birds. If nests are found, they will be safeguarded, with an appropriate buffer, until the chicks have successfully fledged.

Although there were recordings of Snipe during the wintering bird walkover surveys, there were low numbers present. Snipe is a highly adaptable species and will relocate to other areas in the presence of disturbance. There does not need to be any additional restrictions in the form of the timing of vegetation removal for this species.

As previously assessed, there is need for control and management of the Winter Heliotrope, Butterfly Bush and Cotoneaster within the site boundary. These measures still need to be applied; however, the importance of their treatment is to be emphasised with a higher priority that originally listed given their slightly larger spread and colonisation of a wider area.

While these ecological features differ slightly from the original assessment, the proposed amendments are similar in nature and extent to that permitted. They will not give rise to any additional impacts at the construction or operational phases and will not result in any material changes to any identified potential or significant impacts that require consideration of additional mitigation or monitoring measures.

Therefore, it can be concluded that, given the proposed amendments are similar in nature and extent to that permitted, the existing previously listed mitigations and conclusions remain to be effective measures in the protection of local ecological species and features of note

