



**Appropriate
Assessment
Conclusion
Statement**

APPROPRIATE ASSESSMENT CONCLUSION STATEMENT

FOR THE

DÚN LAOGHAIRE-RATHDOWN COUNTY DEVELOPMENT PLAN 2022-2028

for: Dún Laoghaire-Rathdown County Council

County Hall
Marine Road
Dún Laoghaire



by: CAAS Ltd.

1st Floor
24-26 Ormond Quay Upper
Dublin



APRIL 2022

Table of Contents

Section 1	Introduction and Background	1
1.1	Introduction.....	1
1.2	Legislative Requirements in relation to AA	1
1.3	AA Conclusion Statement	1
Section 2	How the findings of the AA were factored into the Plan	2
Section 3	Consideration of Alternatives	7
3.1	Type 1: Alternatives for an Ecosystem Services Approach to the Plan	7
3.2	Type 2: Land Use Zoning	8
3.3	Type 3: Alternatives for Additional Accommodation in Existing Built-up Areas	9
3.4	Type 4: Densities	10
3.5	Type 5: Strategic Land Reserve for Old Connaught.....	10
3.6	Reasons for Choosing the Selected Alternatives in light of Other Reasonable Alternatives Considered.....	12
Section 4	AA Determination	13

List of Tables

Table 1.1	Matters taken into account by the AA.....	1
Table 2.1	Mitigation relating to AA.....	2

Section 1 Introduction and Background

1.1 Introduction

This is the Appropriate Assessment (AA) Conclusion Statement for the Dún Laoghaire-Rathdown County Development Plan. The obligation to undertake AA derives from Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC as transposed into Irish legislation by, inter alia, the Planning and Development Act 2000, as amended. AA is a focused and detailed impact assessment of the implications of a strategic action (such as a plan or programme) or project, alone and in combination with other strategic actions and projects, on the integrity of any European Site in view of its conservation objectives. This AA Conclusion Statement should be read in conjunction with the Plan and associated documents including the AA Natura Impact Report (NIR).

1.2 Legislative Requirements in relation to AA

In carrying out the AA for the Plan, Planning and Development Act 2000, as amended, requires, inter alia, that the Council considers the matters arrayed in the first column on Table 1.1 below. The second column identifies how these issues have been addressed.

Table 1.1 Matters taken into account by the AA

Matter specified by the Regulations	How addressed by AA
(a) the Natura Impact Report	An AA NIR accompanies this AA Conclusion Statement and the Plan.
(b) any supplemental information furnished in relation to any such report	This AA Conclusion Statement accompanies the NIR that provides additional detail on European Sites.
(c) if appropriate, any additional information sought by the authority and furnished by the applicant in relation to a Natura Impact Report	
(d) any information or advice obtained by the public authority	Submissions made during the Plan preparation/AA process that were relevant to the AA resulted in updates being made to the AA NIR.
(e) if appropriate, any written submissions or observations made to the public authority in relation to the application for consent for proposed plan or project	Proposed Material Alterations were screened for the need to undertake Stage 2 AA (Stage 2 AA was undertaken on certain alterations).
(f) any other relevant information	

In addition to the above, the Regulations require that the Council makes available for inspection a determination regarding the outcome of the assessment with respect to whether or not the Plan would adversely affect the integrity of a European site (a copy of this determination is provided at Section 4).

1.3 AA Conclusion Statement

Non-Statutory AA guidance (Department of Environment, Heritage and Local Government, 2009) states that (Section 4.14) it *"is recommended that planning authorities include a clear and discrete AA Conclusion Statement as a distinct section in the written statement of the plan separate to the SEA statement."* This guidance recommends that the following issues are addressed by the AA Conclusion Statement:

- Summary of how the findings of the AA were factored into the Plan (see Section 2);
- Reasons for choosing the Plan as adopted, in the light of other reasonable alternatives considered as part of the AA process (see Section 3);
- A declaration that the Plan as adopted will not have an adverse effect on the integrity of European Sites (provided at Section 4); and
- The NIR (the AA NIR is accompanied by this AA Conclusion Statement and has informed the AA Determination – see Section 4).

Furthermore, as stated in the Draft "Development Plans Guidelines for Planning Authorities" (Department of Housing, Local Government and Heritage, 2021):

"...There is a similar requirement to publish a determination relating to the AA that may have been undertaken. Under Article 6.3 of the Habitats Directive the determination (often termed an 'AA Conclusion Statement') must state as to whether or not the Draft Plan would adversely affect the integrity of a European site. However as stated in Section 3.5, this determination must have been made prior to the adoption of the Draft Plan."

As recommended, this AA Conclusion Statement addresses the above issues, including the signed AA Determination included at Section 4.

Section 2 How the findings of the AA were factored into the Plan

The SEA and AA team worked with the Plan-preparation team at the Council in order to integrate requirements for environmental protection and management into the Plan.

The Plan was prepared in an iterative manner whereby the Plan and AA documents have informed subsequent versions of the other. The findings of the AA were integrated into the Plan through mitigation measures. These mitigation measures ensure that there will be no significant effects to the ecological integrity of any European site from implementation of the Plan. The mitigation measures most relevant to the protection of European sites are identified in Table 2.1 below.

Furthermore, the detailed Plan preparation process undertaken by the Planning Department combined with specialist input from the SEA and AA process facilitated zoning that avoids inappropriate development being permitted in areas of high ecological sensitivity.

Table 2.1 Mitigation relating to AA¹

Recommendations integrated into the Plan, included in:
<p>Policy Objective T25: Environmental Assessment of New Roads It is a Policy Objective that where projects for new roads, identified under Section 5.8, are not already provided for by existing plans/programme or are not already permitted, that the feasibility of progressing these projects shall be examined, taking into account environmental sensitivities as identified in the SEA Environmental Report (including greenhouse gas emissions and other emissions to air) and the objectives of the Plan relating to sustainable mobility. A Corridor and Route Selection Process will be undertaken where appropriate, for relevant new road infrastructure in two stages: Stage 1 – Route Corridor Identification, Evaluation and Selection and Stage 2 – Route Identification, Evaluation and Selection. In implementing this Objective, the Council will comply with any national policy or guidelines issued relating to the assessment of greenhouse gas emissions and other emissions to air for new transport projects.</p>
<p>Special Local Objective 107 To co-operate with the National Transport Authority, Transport Infrastructure Ireland and Wicklow County Council in the establishment of a combined road across the County Brook Valley to provide connections between the proposed new development areas of Old Connaught and Fassaroe (Wicklow County). The Corridor and Route Selection Process outlined by Policy T25 should be followed</p>
<p>Green Infrastructure Policy Objective GIB1: Green Infrastructure Strategy It is a Policy Objective to continue to implement, and update, the DLR Green Infrastructure (GI) Strategy, to protect existing green infrastructure and encourage and facilitate, in consultation with relevant stakeholders, the development, design and management of high quality natural and semi-natural areas. This recognises the ecosystems approach and the synergies that can be achieved with regard to sustainable transport, provision of open space, sustainable management of water, protection and enhancement of biodiversity.</p>
<p>Requirements under Chapter 12: Development Management, including those under the headings of:</p> <p>Impacts on the Environment</p> <ul style="list-style-type: none"> • Environmental Impact Assessment • Appropriate Assessment • Ecological Impact Assessment <p>Environmental Infrastructure</p> <ul style="list-style-type: none"> • Air Pollution • Noise Pollution • Noise, Odour and Vibration Generating Uses • Construction Management Plans • Hours of Construction • New Development/Change of Use - Environmental Impacts • Waste Management Infrastructure facilities and refuse transfer stations • Telecommunications • Development and Overhead Power Lines • Public lighting • Drainage and Water Supply • Flood Risk Management • Coastal Issues - Erosion/Flooding/ Recreation
<p>Policy Objective CS8 – Ecosystem Services Approach: It is a Policy Objective to promote an Ecosystem Services Approach in the preparation of lower-level Plans, Strategies and Development Management.</p> <p>Policy Objective T30: Street Lighting It is a Policy Objective to provide and maintain street lighting on the public road/footway/cycleways throughout the County in accordance with commonly accepted best practice, the Council's public lighting masterplan and the upgrade of sodium lights to LEDs.</p> <p>Policy Objective GIB7: National Marine Planning Framework (NMPF) It is a Policy Objective to support the policies and objectives as appropriate and relevant of the forthcoming National Marine Planning Framework (NMPF), with respect to the conservation, management, and protection for a sustainable future for the marine area.</p> <p>Policy Objective GIB10: Dublin Bay Biosphere It is a Policy Objective to participate, support and contribute to the management of the biosphere, along with its partners and to aim to raise awareness and education to people living, working and using the biosphere, through an Education Strategy. In furtherance of this Policy Objective DLR have contributed to the development of an Environmental Code of Practice for those working in the Biosphere and all partners carry out conservation actions including gathering biodiversity data and monitoring within the biosphere.</p> <p>Policy Objective GIB11: Coastal Area Feasibility Study It is a Policy Objective to explore undertaking a comprehensive feasibility study on the recreational potential along the coastal area of the County which comprehensively addresses recreational impact - including visitor numbers, mapping and surveying of sensitive habitats and</p>

¹ Note that the numbering of individual Plan provisions referenced in this report may be updated during the finalisation of the Plan, including formatting and graphic design.

Recommendations integrated into the Plan, included in:

species and identification of significant threats on European sites - and which would allow an assessment of any future proposals, alone or in combination, to assess impact on the coastal and marine zone within and adjacent to the County boundary. The Council will explore the possibility of carrying out this study with adjoining and/or coastal Local Authorities and/or other agencies.

Policy Objective GIB18: Protection of Natural Heritage and the Environment

It is a Policy Objective to protect and conserve the environment including, in particular, the natural heritage of the County and to conserve and manage Nationally and Internationally important and EU designated sites - such as Special Protection Areas (SPAs), Special Areas of Conservation (SACs), proposed Natural Heritage Areas (pNHAs) and Ramsar sites (wetlands) - as well as non-designated areas of high nature conservation value known as locally important areas which also serve as 'Stepping Stones' for the purposes of Article 10 of the Habitats Directive.

Policy Objective GIB19: Habitats Directive

It is a Policy Objective to ensure the protection of natural heritage and biodiversity, including European sites that form part of the Natura 2000 network, in accordance with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines.

Policy Objective GIB20: Biodiversity Plan

It is a Policy Objective to support the provisions of the forthcoming DLR County Biodiversity Action Plan, 2021 – 2025.

Policy Objective GIB21: Designated Sites

It is a Policy Objective to protect and preserve areas designated as proposed Natural Heritage Areas, Special Areas of Conservation, and Special Protection Areas. It is Council policy to promote the maintenance and as appropriate, delivery of 'favourable' conservation status of habitats and species within these areas.

Policy Objective GIB22: Non-Designated Areas of Biodiversity Importance

It is a Policy Objective to protect and promote the conservation of biodiversity in areas of natural heritage importance outside Designated Areas and to ensure that notable sites, habitats and features of biodiversity importance - including species protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979, the Habitats Directive 1992, Birds and Habitats Regulations 2011, Flora (Protection) Order, 2015, Annex I habitats, local important areas, wildlife corridors and rare species - are adequately protected. Ecological assessments will be carried out for all developments in areas that support, or have potential to support, features of biodiversity importance or rare and protected species and appropriate mitigation/ avoidance measures will be implemented. In implementing this policy regard shall be had to the Ecological Network including the forthcoming DLR Wildlife Corridor Plan and the recommendations and objectives of the Green City Guidelines (2008) and 'Ecological Guidance Notes for Local Authorities and Developers' (Dún Laoghaire- Rathdown Version 2014).

Policy Objective GIB23: County-Wide Ecological Network

It is a Policy Objective to protect the Ecological Network which will be integrated into the updated Green Infrastructure Strategy and will align with the DLR County Biodiversity Action Plan. Creating this network throughout the County will also improve the ecological coherence of the Natura 2000 network in accordance with Article 10 of the Habitats Directive. The network will also include non-designated sites.

Policy Objective GIB24: Rivers and Waterways

It is a Policy Objective to maintain and protect the natural character and ecological value of the river and stream corridors in the County and where possible to enhance existing channels and to encourage diversity of habitat and nature-based solutions that incorporate biodiversity features. It is also policy (subject to the sensitivity of the riverside habitat), to provide public access to riparian corridors, to promote improved passive recreational activities.

Policy Objective GIB25: Hedgerows

It is a Policy Objective to retain and protect hedgerows in the County from development, which would impact adversely upon them. In addition, the Council will promote the protection of existing site boundary hedgerows and where feasible require the retention of these when considering a grant of planning permission for all developments. The Council will promote the County's hedgerows by increasing coverage, where possible, using locally native species and to develop an appropriate code of practice for road hedgerow maintenance. The Council will promote the protection of existing hedgerows when considering a grant of planning permission for all developments.

Policy Objective GIB26: Geological Sites

It is a Policy Objective to protect, promote and preserve sites of Geological and Geomorphological importance, in particular the proposed Natural Heritage Areas (NHAs), and any County Geological Sites (CGS), that become designated during the lifetime of the Plan.

Policy Objective GIB27: Green Belts

It is a Policy Objective to retain the individual physical character of towns and development areas by the designation of green belt areas, where appropriate.

Policy Objective GIB28: Invasive Species

It is a Policy Objective to prepare an 'Invasive Alien Species Action Plan' for the County which will include actions in relation to invasive alien species (IAS) surveys, management and treatment and to also ensure that proposals for development do not lead to the spread or introduction of invasive species. If developments are proposed on sites where invasive species are or were previously present, the applicants will be required to submit a control and management program for the particular invasive species as part of the planning process and to comply with the provisions of the European Communities Birds and Habitats Regulations 2011 (S.I. 477/2011).

Policy Objective GIB29: Nature Based Solutions

It is a Policy Objective to increase the use of Nature Based Solutions (NBS) within the County and to promote and apply adaption and mitigation actions that favour NBS, which can have multiple benefits to the environment and communities. NBS has a role not only to meet certain infrastructure related needs (e.g. flooding management), and development needs, but also to maintain or benefit the quality of ecosystems, habitats, and species.

Policy Objective OSR11: Water-Based Sports

It is a Policy Objective to support and encourage water-based sports and maritime leisure activities along the coast subject to Council Bye-Laws, and the Habitats and Birds Directives. The County features seventeen kilometres of coastline, which is a valuable asset. If utilised to its full potential it can contribute to the health and well-being of the residents of, and workers, in the County and will increase sport and physical activity participation levels locally. These activities can also offer significant potential for tourism growth.

Policy Objective E11: Sustainable Management of Water

It is a Policy Objective to work with Irish Water:

- To ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water in a manner that supports climate action, the circular economy, a healthy society and protection of the environment. (Consistent with NSO 9 of the NPF, RSO 7, RPO 10.1 of the RSES)
- To continue the development and improvement of the water supply and wastewater systems throughout Dún Laoghaire-Rathdown in order to meet the anticipated water and wastewater requirements of the County.
- To ensure facilities comply with the Water Framework Directive and the River Basin Management Plan or any updated version of the document, 'Water Quality in Ireland 2013-2018'(2019) or any updated version of the document, Pollution Reduction Programmes for Designated Shellfish Areas, the Urban Waste Water Treatment Directive and the Habitats Directive.

Policy Objective E17: Water Supply and Wastewater treatment and Appropriate Assessment

It is a Policy Objective to require that all developments relating to water supply and wastewater treatment are subject to screening for Appropriate Assessment to ensure there are no likely significant effects on the integrity, defined by the structure and function, of any Natura 2000 sites and that the requirements of Article 6 of the EU Habitats Directive are met. (Consistent with RPO 10.7 of the RSES).

Policy Objective E18: Groundwater Protection and Appropriate Assessment

It is a Policy Objective to ensure the protection of the groundwater resources in and around the County and associated habitats and species in accordance with the Groundwater Directive 2006/118/EC and the European Communities Environmental Objectives (Groundwater) Regulations, 2010. In this regard, the Council will support the implementation of Irish Water's Water Safety Plans to protect sources of public water supply and their contributing catchment.

<p>Recommendations integrated into the Plan, included in:</p> <p>Special Local Objective 18 To promote the development of the Sutton to Sandycove Promenade and Cycleway, as a component part of the National East Coast Trail Cycle Route and also the Dublin Bay trail from the boundary with Dublin City up to the boundary with Co. Wicklow. Any development proposal will protect and enhance public access to the coast where feasible. Any development proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive to ensure the protection and preservation of all designated SACs, SPAs, and pNHA(s) in Dublin Bay and the surrounding area</p> <p>Special Local Objective 35 To promote Water Leisure Facilities for public use at the coastal fringe of the Gut and rear of the West Pier, subject to the appropriate environmental assessments including any assessment required under the Habitats Directive in co-operation with the relevant agencies.</p> <p>Special Local Objective 115 - To provide an open seawater pool as a part of any future phase of the development at the Dún Laoghaire Baths site. This provision shall take into account environmental feasibility, including ecological, water and cultural heritage sensitivities. Any proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive and shall ensure the protection and preservation of all designated SACs, SPAs, and pNHA(s) in Dublin Bay and the surrounding area.</p> <p>Special Local Objective 116 - To provide a cultural and heritage centre in the environs of the Dún Laoghaire Harbour that focusses on the unique history of emigration from the Carlisle Pier, the construction of the harbour, the role of the harbour in the development of amateur watersports and the celebration of the first suburban rail line and mail boat service. Any proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive and shall ensure the protection and preservation of all designated SACs, SPAs, and pNHA(s) in Dublin Bay and the surrounding area.</p> <p>Special Local Objective 117 - The feasibility of incorporating the East Coast Cycle Trail into any coastal protection works required between Corbawn Lane and the proposed DART station at Woodbrook should be investigated. Such works shall be carried out in accordance with the recommendations of the Coastal Defence Strategy (2010) or any future Strategy. Any proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive and shall ensure the protection and preservation of all designated SACs, SPAs, and pNHA(s) in Dublin Bay and the surrounding area.</p> <p>Requirements under Chapter 12: Development Management, including those under the headings of:</p> <p>Impacts on the Environment</p> <ul style="list-style-type: none"> • Environmental Impact Assessment • Appropriate Assessment • Ecological Impact Assessment <p>Green Infrastructure and Biodiversity</p> <ul style="list-style-type: none"> • Green Infrastructure • Biodiversity • Sensitive Landscapes and Site Features • High Amenity Landscapes, Views and Prospects • Fencing of Hitherto Open Land <p>Construction Management Plan requirements under Plan Sections 12.9.4 to 12.9.6</p> <p>References to the protection of European sites/Appropriate Assessment or the Habitats Directive in the detailed text under:</p> <ul style="list-style-type: none"> • Policy Objective T13: Coastal Cycling Infrastructure Objective • Policy Objective T23: Roads and Streets • Policy Objective GIB10: Dublin Bay Biosphere • Policy Objective GIB18: Protection of Natural Heritage and the Environment • Policy Objective GIB19: Habitats Directive • Policy Objective GIB21: Designated Sites • Policy Objective GIB23: County-Wide Ecological Network • Policy Objective GIB24: Rivers and Waterways • Policy Objective E13: Wastewater Treatment Systems • Policy Objective E122: Flood Risk Management • Policy Objective OSR8: Greenways and Blueways Network: <p>Requirements under Chapter 13 Land Use Zoning Objectives, under the heading of Appropriate Assessment</p> <p>SLO 151 To provide for a number of holiday caravan/camping facilities within a 1km radius of the cross roads at Glencullen subject to the following: ensuring that there is not an over proliferation of such facilities, ensuring any proposals do not undermine the overall zoning objective, ensuring proposals do not have a negative impact on the source protection area or sensitive watercourses as identified in the Glencullen Local Area Plan and/or in section 10.2.2.5 of this Plan and ensuring that the development (including any resultant increases in visitor numbers and/or behaviour) does not affect the integrity of the Knocksink Wood Special Area of Conservation. Each facility shall be limited to a total of 10 pitches (combination of pods, glamping, tents, camper vans) and any glamping pods shall be commensurate in size and scale to a tent/camper van so as to avoid any negative visual impact on the landscape.</p> <p>Policy Objective T27: Traffic Noise It is a Policy Objective to ensure that traffic noise levels are considered as part of new developments along major roads/rail lines in accordance with best practice guidelines.</p> <p>Policy Objective E114: Air and Noise Pollution It is a Policy Objective:</p> <ul style="list-style-type: none"> • To implement the provisions of national and EU Directives on air and noise pollution and other relevant legislative requirements in conjunction with other agencies as appropriate. (Consistent with RPO 10.10 of the RSES) • To maintain and manage a Dublin County ambient air quality monitoring network in conjunction with the EPA and TII and to make available to the public the resulting air quality measurements via the EPA website www.epa.ie/air/quality. • To support the implementation of objectives of the 'Dublin Agglomeration Environmental Noise Action Plan 2018-2023'. <p>Policy Objective E115: Light Pollution It is a Policy Objective to ensure that the design of external lighting schemes minimise the incidence of light spillage or pollution in the immediate surrounding environment and has due regard to the residential amenity of surrounding areas.</p> <p>Policy Objective E116: Water Pollution It is a Policy Objective to implement the provisions of water pollution abatement measures in accordance with national and EU Directives and other legislative requirements in conjunction with other agencies as appropriate.</p> <p>Policy Objective E117: Major Accidents It is a Policy Objective to have regard to the provisions of the Major Accidents Directive (European Council Directive 2012/110/EU). This Directive relates to the control of major accident hazards involving dangerous substances and its objectives are to prevent major accidents and limit the consequences of such accidents.</p> <p>Coastal Protection</p> <p>Policy Objective E124: Coastal Defence It is a Policy Objective to implement and have regard to the recommendations of the Coastal Defence Strategy (2010) for the County where feasible. The Council will endeavour to (i) obtain funding from the OPW in order to undertake defence measures for specific areas as prioritised in the Strategy (ii) become part of any future national OPW Coastal Monitoring Survey Programme. Where feasible and appropriate the Council will endeavour to incorporate leisure and transport objectives with coastal protection.</p> <p>12.9.6 New Development/Change of Use - Environmental Impacts 12.9.6 New Development/Change of Use - Environmental Impacts, including: Where brownfield redevelopment is proposed, require adequate and appropriate investigations to be carried out into the nature and extent of any soil and groundwater contamination and the risks associated with site development work.</p>

<p>Recommendations integrated into the Plan, included in:</p> <p>Policy Objective E15: River Basin Management Plans (RMBPs) It is a Policy Objective: <ul style="list-style-type: none"> • To ensure the delivery of the relevant policies and objectives of the River Basin Management Plan for Ireland 2018 – 2021 and any subsequent plan, including those relating to protection of water status, improvement of water status, prevention of deterioration and meeting objectives for designated protected sites. • To support Irish Water in its implementation of Water Quality Management Plans for ground, surface, coastal and estuarine waters as part of the implementation of the EU Water Framework Directive. • To support Irish Water in the development of Drinking Water Protection Plans. </p> <p>Policy Objective E18: Groundwater Protection and Appropriate Assessment It is a Policy Objective to ensure the protection of the groundwater resources in and around the County and associated habitats and species in accordance with the Groundwater Directive 2006/118/EC and the European Communities Environmental Objectives (Groundwater) Regulations, 2010. In this regard, the Council will support the implementation of Irish Water's Water Safety Plans to protect sources of public water supply and their contributing catchment.</p> <p>Policy Objective E116: Water Pollution It is a Policy Objective to implement the provisions of water pollution abatement measures in accordance with national and EU Directives and other legislative requirements in conjunction with other agencies as appropriate.</p> <p>Policy Objective T27: Traffic Noise It is a Policy Objective to ensure that traffic noise levels are considered as part of new developments along major roads/rail lines in accordance with best practice guidelines.</p> <p>Policy Objective E114: Air and Noise Pollution It is a Policy Objective: <ul style="list-style-type: none"> • To implement the provisions of national and EU Directives on air and noise pollution and other relevant legislative requirements in conjunction with other agencies as appropriate. (Consistent with RPO 10.10 of the RSES) • To maintain and manage a Dublin County ambient air quality monitoring network in conjunction with the EPA and TII and to make available to the public the resulting air quality measurements via the EPA website www.epa.ie/air/quality. • To support the implementation of objectives of the 'Dublin Agglomeration Environmental Noise Action Plan 2018-2023'. </p> <p>Policy Objective CA1: National Climate Action Policy It is a Policy Objective to support the implementation of International and National objectives on climate change including the 'Climate Action Plan 2021 Securing Our Future', the 'National Adaptation Framework' 2018, the 'National Energy and Climate Plan 2021-2030', and take account of the 'Climate Action and Low Carbon Development (Amendment) Act 2021', and subsequent updates, other relevant policy, Guidelines and legislation, that support the climate action policies included in the County Development Plan.</p> <p>Policy Objective CA2: Regional Climate Action It is a Policy Objective to work closely with the Eastern Midland Regional Authority (EMRA) the Dublin Metropolitan Climate Action Regional Office (Dublin CARO), City of Dublin Energy Management Agency (Codema) and the Sustainable Energy Authority of Ireland (SEAI) to achieve the climate action policies and objectives set out in the Eastern and Midland Region Spatial and Economic Strategy (consistent with RPO 3.1, 3.6, 7.4, 7.30, 7.31, 7.32, 7.33, 7.35, 7.38, 7.40, 7.42, 7.43, 7.7 of the RSES).</p> <p>Policy Objective CA3: Measuring Greenhouse Gas Impacts It is a Policy Objective that spatial and infrastructure planning are consistent with climate mitigation and adaptation objectives. When it is available, the Council will be informed by the work led by the Eastern and Midland Regional Assembly to develop a methodology for quantifying the GHG impacts of spatial planning policies, (QGasSP, an ESPON EU research programme) and the forthcoming Development Plan Guidelines or other national guidance as appropriate. The Council will quantify the GHG impacts for this County Development Plan when EMRA guidelines become available and also ensure the Development Plan is consistent with the approach to climate action recommended in any forthcoming revised Section 28 Development Plan Guidelines or other relevant guidelines and if necessary, vary the development plan "(Consistent with NPO 54 of the NPF and RPO 3.6 of the RSES).</p> <p>Policy Objective CA4: Dún Laoghaire Rathdown County Council Climate Change Action Plan 2019-2024 (DLR CCAP) It is a Policy Objective to implement and take account of the Dún Laoghaire-Rathdown County Council Climate Change Action Plan 2019 - 2024 (DLR CCAP), to take account of the 'Climate Action and Low Carbon Development (Amendment) Act 2021', and subsequent updates of both and to transition to a climate resilient low carbon County. (Consistent with SO8 of the NPF, RPO 7.32, 7.33 of the RSES).</p> <p>Policy Objective E11: Sustainable Management of Water It is a Policy Objective to work with Irish Water: <ul style="list-style-type: none"> • To ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water in a manner that supports climate action, the circular economy, a healthy society and protection of the environment. (Consistent with NSO 9 of the NPF, RSO 7, RPO 10.1 of the RSES) • To continue the development and improvement of the water supply and wastewater systems throughout Dún Laoghaire-Rathdown in order to meet the anticipated water and wastewater requirements of the County. • To ensure facilities comply with the Water Framework Directive and the River Basin Management Plan or any updated version of the document, 'Water Quality in Ireland 2013-2018'(2019) or any updated version of the document, Pollution Reduction Programmes for Designated Shellfish Areas, the Urban Waste Water Treatment Directive and the Habitats Directive. </p> <p>Policy Objective E12: Irish Water Enabling Policies Irish Water's Plans and Programmes It is a Policy Objective - in conjunction with the Eastern and Midland Regional Authority, where appropriate - to work with and support Irish Water in the delivery of the strategic objectives and strategic water and wastewater projects and infrastructure as set out in the 'Water Services Strategic Plan' (2015), any subsequent plan, Irish Water's Capital Investment Plan 2020 – 2024, any subsequent Capital Investment Plans and the forthcoming National Water Resources Plan, so as to ensure provision of infrastructure to service settlements in accordance with the Core Strategy of this Plan, and the settlement strategy of the RSES. (Consistent with RPO 10.2, 10.3, 10.11, 10.16 of the RSES)</p> <p>Reducing Leakage It is a Policy Objective to work with Irish Water to reduce leakage in accordance with any forthcoming Irish Water Regional Water Conservation Strategy. (Consistent with RPO 10.4 of the RSES) Water and Wastewater Network Design and Construction It is a Policy Objective to support the provision of integrated and sustainable water services through consultation with Irish Water on the layout and design of water services in relation to the selection and planning of development areas and the preparation of plans.</p> <p>Promote Water Conservation It is a Policy Objective in conjunction with Irish Water to promote and support water conservation and demand management measures among all water users in existing and new developments. (Consistent with NSO 9 of the NPF, RSO 7 and RPO 10.1 of the RSES)</p> <p>Policy Objective E13: Wastewater Treatment Systems It is a Policy Objective that all new developments in areas served by a public foul sewerage network connect to the public sewerage system, either directly or indirectly. It is a Policy Objective to promote the changeover from septic tanks to collection networks where this is feasible and to strongly discourage the provision of individual septic tanks and domestic wastewater treatment systems in order to minimise the risk of ground and surface water pollution. It is a Policy Objective to prohibit multiple dwelling units discharging to communal wastewater treatment systems. Consideration of single dwelling domestic wastewater treatment systems in those areas not served by a public foul sewerage system will be subject to full compliance with the EPA Code of Practice Domestic Wastewater Treatment Systems (Population Equivalent ≤ 10) (March 2021), as may be amended or updated.</p>
--

<p>Recommendations integrated into the Plan, included in:</p> <p>Consideration of non-domestic wastewater treatment systems in those areas not served by a public foul sewerage system will be subject to full compliance with EPA Wastewater Treatment Manuals ('Treatment Systems for Small Communities, Business, Leisure Centres and Hotels'). Wastewater treatment systems shall be located entirely within the site boundary.</p> <p>The Council will liaise with Irish Water to ensure compliance with existing licenses, the Urban Waste water Directive and the EU Habitats Directive. See section 12.10.3 Waste Water Treatment Systems for detailed requirements.</p> <p>Policy Objective E14: Water Drainage Systems It is a Policy Objective to require all development proposals to provide a separate foul and surface water drainage system – where practicable. (Consistent with RPO 10.12)</p> <p>Policy Objective E16: Sustainable Drainage Systems It is a Policy Objective to ensure that all development proposals incorporate Sustainable Drainage Systems (SuDS).</p> <p>Policy Objective E17: Water Supply and Wastewater treatment and Appropriate Assessment It is a Policy Objective to require that all developments relating to water supply and wastewater treatment are subject to screening for Appropriate Assessment to ensure there are no likely significant effects on the integrity, defined by the structure and function, of any Natura 2000 sites and that the requirements of Article 6 of the EU Habitats Directive are met. (Consistent with RPO 10.7 of the RSES).</p> <p>Policy Objective E19: Drainage Impact Assessment It is a Policy Objective to ensure that all new developments prepare a Drainage Impact Assessment that meets the requirements of the Council's Development Management Thresholds Information Document (see Appendix 3) and the Stormwater Management Policy (See Appendix 7.1).</p> <p>Policy Objective E110: Storm Overflows of Sewage to Watercourses It is a Policy Objective to work alongside Irish Water to minimise the number and frequency of storm overflows of sewage to watercourses and to establish, in co-operation with the adjoining Local Authorities and Irish Water, a consistent approach to the design, improvement and management of these intermittent discharges to ensure that the needs of the Region's receiving waters are met in a cost effective manner.</p> <p>Construction Management Plan requirements under Plan Sections 12.9.4 to 12.9.6</p> <p>Policy Objective E17: Maritime Economy It is a Policy Objective to support the sustainable development of the maritime economy.</p> <p>Policy Objective E18: Rural Development It is a Policy Objective to facilitate the development of acceptable rural enterprises and to minimise pollution from agricultural and industrial sources by means of development management and water pollution legislation.</p>

Section 3 Consideration of Alternatives

This section summarises the alternatives considered for the Plan during the preparation process. These alternatives have been incorporated into the Plan having regard to both:

1. The environmental effects (including those related to ecology and European sites) which are identified by the SEA (informed by the AA) and are detailed above; and
2. Planning - including social and economic - effects that also were considered by the Council.

3.1 Type 1: Alternatives for an Ecosystem Services Approach to the Plan

Although many natural capital² and ecosystem³ service issues have been taken into account over previous Plan periods, the importance of these in fulfilling environmental obligations has increasingly emerged. An Ecosystems Services Approach would provide a strategy for the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way.

- Type 1 - Alternative A: A Plan that takes an Ecosystems Services Approach.
- Type 1 - Alternative B: A Plan that does not take an Ecosystems Services Approach

Alternative A would integrate a strategy throughout the Plan for the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way.

Principles that would be integrated throughout the Plan, in a coordinated and comprehensive manner, would include:

- Consideration of natural systems - by using knowledge of interactions in nature and how ecosystems function
- Taking into account of the services that ecosystems provide - including those that underpin social and economic well-being, such as flood and climate regulation or recreation, culture and quality of life
- Involving people - those who benefit from the ecosystem services and those managing them need to be involved in decisions that affect them.

This would mean that there would be:

- An increased likelihood in the extent, magnitude and frequency of positive effects occurring with regard to natural capital⁴ and ecosystem service issues, such as the management of air quality, noise pollution, light pollution, pollination, flood risk, water bodies and river basins and natural resources supporting energy production and recreation; and
- A decreased likelihood in the extent, magnitude and frequency of adverse effects on natural capital and ecosystem services.

Alternative B would not integrate a strategy throughout the Plan for the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way.

As has been the case over previous plan periods, many natural capital and ecosystem service issues would be integrated into individual Plan Policy Objectives and into decision making at lower tiers of plan preparation and development management. However, this approach would be less coordinated and comprehensive than would be the case under an Ecosystems Services Approach.

This would mean that there would be:

² Renewable and non-renewable resources (e.g. plants, animals, air, water, soils, minerals)

³ Ecosystems are multifunctional communities of living organisms interacting with each other and their environment. Ecosystems provide a series of services for human well-being (ecosystem services) either directly or indirectly contributing towards human wellbeing

⁴ Renewable and non-renewable resources (e.g. plants, animals, air, water, soils, minerals)

- A decreased likelihood in the extent, magnitude and frequency of positive effects occurring with regard to natural capital and ecosystem service issues; and
- An increased likelihood in the extent, magnitude and frequency of adverse effects on natural capital and ecosystem services.

Selected Type 1 Alternative for the Plan: Alternative A, subject to review of the existing Green Infrastructure Strategy into which the Ecological Network which will be integrated and which will align with the DLR County Biodiversity Action Plan (see Draft Plan Policy Objectives GIB1 and GIB23).

3.2 Type 2: Land Use Zoning

These types of alternatives consider the land use zoning of social, educational, health, religious, recreational and leisure, cultural and civic infrastructure (collectively referred to as neighbourhood infrastructure) to serve the local and wider community.

- Type 2 - Alternative A: Zone neighbourhood infrastructure as it currently is, along with residential uses, with Land Use Zoning Objective A (“To protect and/or improve residential amenity”).
- Type 2 - Alternative B: Zone neighbourhood infrastructure with Land Use Zoning Objective SNI “To protect, improve and encourage the provision of sustainable neighbourhood infrastructure”.

Alternative A would place the lands that provide this essential infrastructure at risk from coming under pressure for residential development. Such pressure could result in existing facilities / uses on site being lost or significantly downgraded to a degree that they would not adequately serve the expanding adjoining residential communities.

Because of this, opportunities would be lost for retaining community and other facilities within close proximity of the communities they serve and the result would be more unsustainable forms of development with increased travel times and a resultant need to travel by private car with associated transport generated emissions.

Alternative A would make living and working within and adjacent to the existing built-up footprint less desirable. As areas within and adjacent to the existing built-up footprint are generally more robust from an environmental perspective, better serviced and better connected, this alternative would hinder the County to sustainably accommodate new residents and maintain and improve services to existing and future communities in accordance with the NPF and RSES.

Alternative B would:

- Improve accessibility / permeability between new and existing residential communities and neighbourhood infrastructure, reducing travel times and the need to travel by private car with associated transport generated emissions; and
- Ensure that the existing and future, local and wider, communities are better served by this infrastructure in accordance with the NPF and RSES.

As a result, this alternative would make living and working within and adjacent to the existing built-up footprint more desirable – these areas are generally more robust from an environmental perspective, better serviced and better connected. In this way, this alternative would contribute towards environmental protection and sustainable development, enabling the County to sustainably accommodate new residents and maintain and improve services to existing and future communities.

Selected Type 2 Alternative for the Plan: Alternative B: Zone neighbourhood infrastructure with Land Use Zoning Objective SNI “To protect, improve and encourage the provision of sustainable neighbourhood infrastructure”.

3.3 Type 3: Alternatives for Additional Accommodation in Existing Built-up Areas

The “0/0 Zone” in the 2016 Plan has an objective for “No increase in the number of buildings permissible”. This objective covers sensitive areas of Killiney and Dalkey proximate to the coast and much of this area is located close to the DART line, where higher densities would otherwise be permissible. The Office of the Planning Regulator requested for the “0/0 Zone” contained in the existing 2016 Plan not to be included in the new Plan.

Three alternatives were considered under this type as follow:

- Type 3 - Alternative A: Include “0/0 Zone”
- Type 3 - Alternative B: Do not include “0/0 Zone”
- Type 3 - Alternative C: Include “0/0 Zone” but reduce extent in comparison to the 2016 Plan’s coverage

By applying the “0/0 Zone” (which has an objective for “No increase in the number of buildings permissible”) over the widest area, **Alternative A** would provide the greatest amount of protection of areas which are often sensitive from an amenity (including that contributed towards by architectural structures/areas, archaeological monuments/zones and views, which are already protected under other Plan objectives) and ecological perspective (including the protected Dalkey Coastal Zone and Killiney Hill pNHA).

However, this application of the “0/0 Zone” in locations close to public transport, where government policy supports higher densities, would not contribute towards objectives for sustainable mobility, minimising greenhouse gas emissions from transport, efficiently using land, compact growth and optimising the use of existing infrastructure. Development that could be sustainably accommodated in the area covered by the “0/0 Zone” under Alternative A would have the potential to be pushed out towards areas that are less well-serviced and less well-connected, resulting in unnecessary potentially significant adverse effects on all environmental components.

By not including the “0/0 Zone”, **Alternative B** would provide the least amount of protection of areas which are often sensitive from an amenity (including that contributed towards by architectural structures/areas, archaeological monuments/zones and views, which are already protected under other Plan objectives) and ecological perspective (including the protected Dalkey Coastal Zone and Killiney Hill pNHA).

The removal of the “0/0 Zone” in locations close to public transport, where government policy supports higher densities, would contribute towards objectives for sustainable mobility, minimising greenhouse gas emissions from transport, efficiently using land, compact growth and optimising the use of existing infrastructure. Development that could be sustainably accommodated in the area currently covered by the “0/0 Zone” under the existing 2016 Plan would not be pushed out towards areas that are less well-serviced and less well-connected, avoiding unnecessary potentially significant adverse effects on all environmental components.

Alternative C involves including the “0/0 Zone” but reducing its extent in comparison to the 2016 Plan’s coverage, a mixture of Alternative A and B that takes into account traffic, visual and ecological designation issues and provides the “0/0 Zone” in some locations but not in others. The new objective for these areas would allow for sensitive infill in locations which are within 10 minutes’ walk of a DART station and which would not detract from the unique character of the area visually or by traffic generation which would necessitate changes to the road network.

Selected Type 3 Alternative for the Plan: Alternative C: Include “0/0 Zone” but reduce extent in comparison to the 2016 Plan’s coverage.

3.4 Type 4: Densities

Alternatives identified relating to densities comprise:

- Type 4 - Alternative A: Application of a single standard density across the whole County in order to calculate the potential residential yield relating to land zoned for residential purposes for the Core Strategy.
- Type 4 - Alternative B: Application of different densities at different locations, as appropriate; higher densities where sustainable transport mode opportunities are available and lower densities where constraints are presented by, for example, cultural heritage designations or the local road network.

Alternative A could lead to the potential over or undersupply of land for primarily residential purposes.

The application of a singular low net residential density across the County could fundamentally undermine both national and regional strategic outcomes including the efficient use of land, compact growth and the transition towards a low carbon and more climate resilient society. This would have the potential to push new development towards more environmentally sensitive lands outside of the County that are less well-serviced and less well-connected, resulting in unnecessary potentially significant adverse effects on all environmental components.

The application of a singular high net residential density could result in a potential mis-alignment between the supply of zoned land to meet the projected demand for new housing. This could result in a misalignment between new development and essential services provision with associated potential for adverse effects on environmental components.

Alternative B would provide for the most sustainable Core Strategy, which would contribute towards environmental protection and management the most.

Higher densities would be provided where sustainable transport mode opportunities are available and lower densities would be provided where constraints are presented by, for example, cultural heritage designations or the local road network. This approach would contribute towards national and regional strategic outcomes including the efficient use of land, compact growth and the transition towards a low carbon and more climate resilient society.

Alternative B would help to ensure compact, sustainable development within and adjacent to the existing built-up footprint and would conflict with the protection and management of environmental components the least. Alignment between new development and essential services provision would be most likely under Alternative B.

Selected Type 4 Alternative for the Plan: Alternative B: Application of different densities at different locations, as appropriate.

3.5 Type 5: Strategic Land Reserve for Old Connaught

In light of the population allocation approved by the Eastern Midland Regional Assembly to enable the planned growth of the Key Town of Bray to 2031 (falling outside the timeframe of the 2022-2028 Plan), and the regional designation of Old Connaught as a strategic residential development area to facilitate the westward expansion of Bray, it is considered appropriate to identify a Strategic Land Reserve (SLR) to meet this designated future growth. The SLR does not comprise a residential zoning status or any future zoning status however it does protect an area from ad hoc and inappropriate development and provide a framework for potential future growth beyond the timeframe of the Plan period of 2028.

Alternatives identified relating to the SLR, as identified and considered in the Draft Background Paper for the SLR for Old Connaught, comprise:

- Type 5 - SLR 1 Alternative A: Old Connaught North (see Figure 3.1)

- Type 5 - SLR 2 Alternative B: Old Connaught North West (see Figure 3.2)
- Type 5 - SLR 3 Alternative C: Old Connaught South West (see Figure 3.2)

Alternative A: SLR 1 Old Connaught North

The SLR 1 lands are considered to be strategically located to benefit from planned strategic infrastructure upgrades in the area. The location of the lands immediately adjacent to and within walking distance of planned high frequency transport including the Green Line Luas extension, a Core Bus Corridor and the DART, would support the potential of the lands to comprise a sustainable urban extension of the Old Connaught area with access, through sustainable means, to strategic employment locations, local services and amenities. Constraints relating to the SLR 1 lands include the loss of existing agricultural and forestry land, impacts on identified protected views, proximity to a protected structure and potential noise pollution associated with the M11. While the lands would comprise 'greenfield' expansion of the built-up area as opposed to brownfield/infill compact growth it is considered that, subject to planned infrastructure upgrades, the SLR 1 lands would comprise a sustainable extension to the Old Connaught area.

Alternative B: SLR 2 Old Connaught North West

The SLR 2 lands are considered to be well located to benefit from planned strategic infrastructure upgrades in the area. The location of the lands in proximity to the planned Green Line Luas extension would support the potential of the lands to comprise a sustainable urban extension of the Old Connaught area with access, through sustainable means, to strategic employment locations, local services and amenities. Constraints relating to the SLR 2 lands include the loss of an active sporting facility serving the local and wider community and impacts on identified protected views. While the lands would not be considered to comprise compact growth it is considered that, in the context of planned infrastructure upgrades, the SLR 2 lands could, in part, comprise a sustainable extension to the Old Connaught area.

Alternative C: SLR 3 Old Connaught South West

The SLR 3 lands are considered to be well located to benefit from planned strategic infrastructure upgrades in the area. The lands do however have a number of constraints including: the comparative distance of part of the lands from planned high frequency transport and resultant connectivity to requisite amenities, services and employment locations; loss of existing agricultural lands; proximity to the Ballyman Glen, a Special Area of Conservation; impact on views identified for preservation; existing utility infrastructure locating at the lands; and, archaeology.

Selected Type 5 Alternative for the Plan: Alternative A: SLR 1 Old Connaught North. Having appraised each of the potential sites and undertaken a comparative analysis, SLR 1 (Alternative A) emerges as the most preferable on a number of fronts, and in particular those criteria identified in the NPF and RSES, and it is therefore recommended that SLR 1 is advanced as a potential strategic land reserve for inclusion in the Plan. The rationale for this recommendation is expanded upon further in the main SEA Environmental Report.

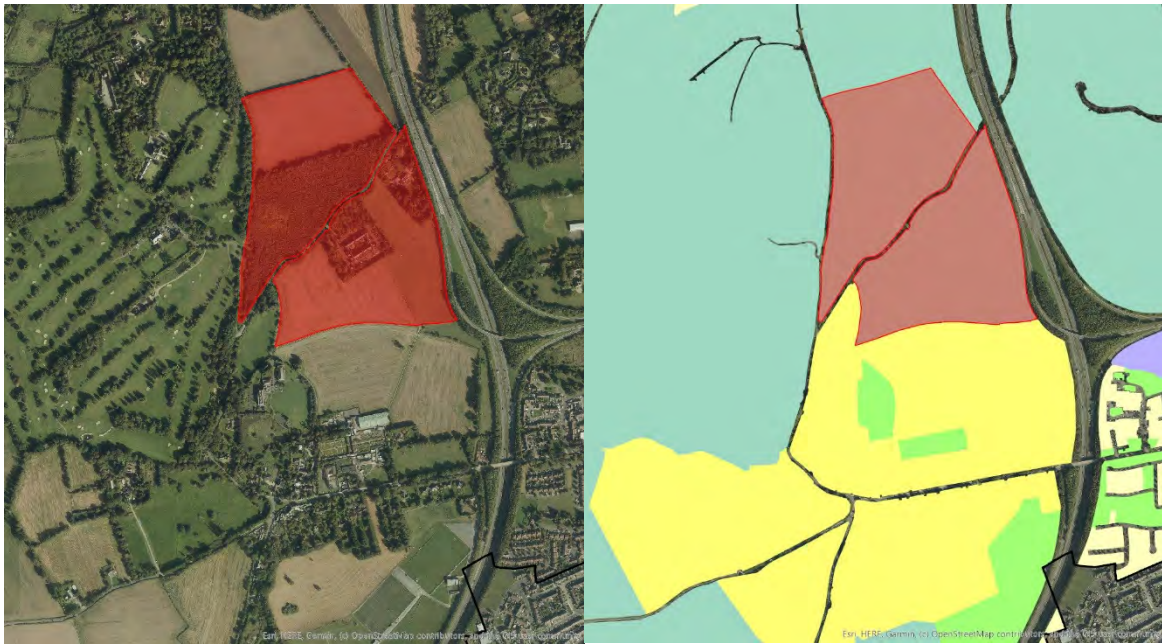


Figure 3.1 Type 5, Alternative A: SLR 1 Old Connaught North

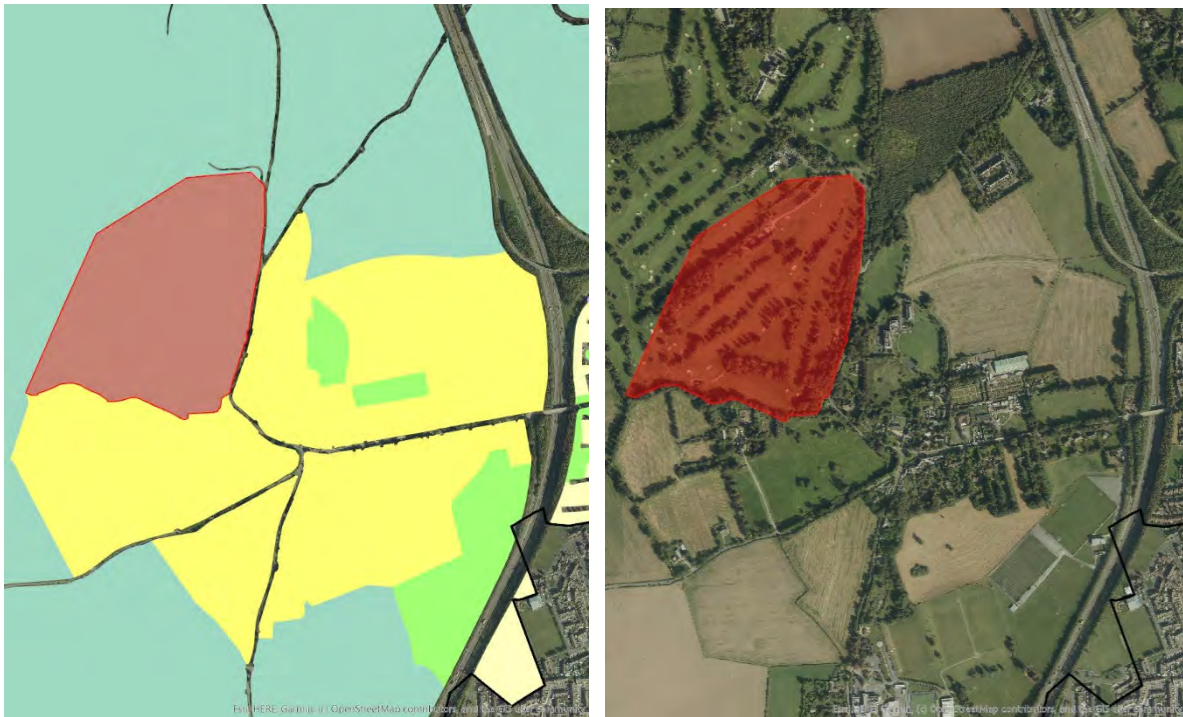


Figure 3.2 Type 5, Alternative B: SLR 2 Old Connaught North West

3.6 Reasons for Choosing the Selected Alternatives in light of Other Reasonable Alternatives Considered

Selected alternatives for the Plan from each of the tiers of alternatives that emerged from the planning/SEA process are indicated above. These alternatives have been incorporated into the Plan having regard to both:

1. The environmental effects (which included potential effects relating to ecology and European sites) and are summarised above; and
2. Planning - including social and economic - effects that also were considered by the Council.

Section 4 AA Determination

No. PGEN/ 0 0 0 8 - 2022

Dún Laoghaire-Rathdown County Council

LOCAL GOVERNMENT ACTS 1925 - 2014

RECORD OF EXECUTIVE BUSINESS CHIEF EXECUTIVE'S ORDERS

Appropriate Assessment Determination

under Section 177V of the Planning and Development Act 2000, as amended,

for the

Dún Laoghaire-Rathdown County Development Plan 2022-2028

An Appropriate Assessment Determination is being made in relation to the potential for the Dún Laoghaire-Rathdown County Development Plan 2022-2028 that is being adopted to have effects on the integrity of European sites.

Section 177V of the Planning and Development Act 2000, as amended, and Article 6(3) of the Habitats Directive requires inter alia a determination as to whether or not a plan or project would adversely affect the integrity of any European site(s).

In carrying out this Appropriate Assessment (AA), the matters specified under Part XAB of the Planning and Development Act 2000 (as amended), including the following are being taken into account:

- The consolidated Natura Impact Report;
- The Natura Impact Report for the Proposed Material Alterations;
- The Natura Impact Report prepared for the Draft Plan;
- Written submissions made during the Plan preparation process; and
- Ongoing advice on AA from the Council's agents.

As part of the AA, it was identified that the Plan may, if unmitigated, have significant effects on 16 (no.) European sites. Factors that could potentially affect the integrity of European sites include:

- Provisions for sectors such as climate action, urbanisation including residential and economic development, streetscape works, community facilities, transport, green infrastructure, energy, environmental infrastructure, recreational, natural resource, which introduce sources for effects through construction phase such as habitat destruction, light pollution, hydrological interactions and disturbance effects; and
- Loading pressures from the operational phase of developments – these sources could result in habitat loss, disturbance effects, interactions with water quality and habitat fragmentation.

Dún Laoghaire-Rathdown County Council

LOCAL GOVERNMENT ACTS 1925 - 2014

RECORD OF EXECUTIVE BUSINESS CHIEF EXECUTIVE'S ORDERS

The reasoning and Conclusions presented in the AA are as follows:

- Implementation of the Plan would have had the potential to result in effects to the integrity of European sites, if unmitigated.
- The risks to the safeguarding and integrity of the qualifying interests, special conservation interests and conservation objectives of the European sites have been addressed by the inclusion of mitigation measures that will prioritise the avoidance of effects in the first place and reliably mitigate effects where these cannot be avoided. In addition, any lower-level plans and projects arising through the implementation of the Plan will themselves be subject to AA when further details of design and location are known.
- In-combination effects from interactions with other plans and projects have been considered in this assessment and the mitigation measures have been incorporated into the Plan – these measures are robust and will ensure there will be no effects on the integrity of European sites as a result of the implementation of the Plan either alone or in-combination with other plans/projects.
- Having incorporated mitigation measures, the Plan is not foreseen to give rise to any effect on the integrity of European sites, alone or in combination with other plans or projects (except as provided for in Article 6(4) of the Habitats Directive, viz. There must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the plan to proceed; and c) Adequate compensatory measures in place). This evaluation is made in view of the conservation objectives of the habitats or species, for which these sites have been designated.

Having carefully considered the information referred to above and being in agreement with and adopting the reasoning and conclusion presented it is hereby recommend that that An Appropriate Assessment Determination be made that the Dún Laoghaire-Rathdown County Development Plan 2022-2028 shall not adversely affect the integrity of a European site pursuant to Section 177V of the Planning and Development Act 2000, as amended, and for the purposes of Article 6(3) of the Habitats Directive.

Signed Laura McGauran

Date: 10/3/2022

L McGauran, Senior Planner

