

Addendum to

Environmental Impact Assessment
Screening Report
for Phase 1 of Proposed Sporting Facilities
at Shanganagh Park, Co. Dublin

addressing amendments to the development
as proposed at January 2024

for: Dún Laoghaire Rathdown County Council

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1. Introduction

CAAS produced an initial EIA Screening Report (EIASR) for the development of phase 1 sporting facilities in Shanganagh Park in November 2021 and found that the development as then proposed did not need to be subject to Environmental Impact Assessment and no Environmental Impact Assessment Report was required for it. This EIASR was used in support the Council's EIA screening determination for a Part VIII consent process. This finding was contested to An Bord Pleanála by a third-party request for an EIA screening determination, made under article 120 of the Planning and Development Regulations 2001. In April 2022 the Board issued its EIA screening determination which confirmed that EIA was not required.

The EIASR was updated in April 2023 to take account of further design changes prior to commencement of a second Part VIII process.

The EIA screening for the revised proposal was subsequently contested to An Bord Pleanála by a third-party request for an EIA screening determination. In January 2024 the Board issued its determination, finding that the proposed development is not likely to cause significant effects on the environment and accordingly does not need to be subject to EIA and no EIAR is required for it.

In the period since commencement of the Part VIII process the Council made a number of amendments to the proposed development. This addendum presents a review of the proposed amendments to ascertain whether they change the findings of the April 2023 EIASR.

In preparation of this addendum, regard has been had to the same guidelines and criteria as described in the April 2023 report. It has been prepared by Paul Fingleton, EIA lead for CAAS. Paul was the lead author of the EIASRs for the previous iterations of the development.

2. The proposed development

The proposal is described in the April 2023 EIASR. The amendments now proposed are as follows:

- re-location of the pitch in an easterly direction including the ballstop netting and goalposts to preserve the archaeological material in situ;
- removal of floodlighting from the pitch;
- amendment of levels to create pitch and install drainage;
- re-positioning of the viewing mound location; and
- re-shaping of the bio-retention pond, retaining the same volume.

The drawings provided in the Chief Executive's Report set out full details of the amendments to the proposed development. The amended layout is shown in Figure B of this report. The revised document set includes *inter alia* the following:

- an Archaeological Assessment;
- correspondence from the National Monuments Service of the Dept. of Housing, Heritage and Local Government which includes their recommendations, taking account of the findings presented in the Archaeological Assessment;
- an addendum to the April 2023 AA Screening and EclA reports produced project ecologists; and
- a revised Arboricultural Assessment.



Figure A Previous (April 2023) layout of proposed pitch, running track and pond
Source: DLRCC



Figure B Amended layout of proposed pitch, running track and pond

Source: DLCC (a full size version of this drawing is contained in the Chief Executive’s Report)

3. Project type

The proposed changes do not affect the finding of the 2023 EIASR that the amended proposed development does not correspond to any into a project type prescribed for EIA purposes in Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended. However, it is noted that the Board's inspector took the view that the project did fall into the Urban Development Project type (10(b)(iv))¹.

This interpretation of the project type was pre-empted in the 2023 EIASR where it stated 'if project type 10(b)(iv) [is] taken to have a wider meaning, it may be considered that the development does correspond to this project type'.

4. Sub-threshold development

Notwithstanding the view taken in the April 2023 EIASR that the proposal was not a sub-threshold development, that report proceeded on a precautionary basis to review the project against the criteria for review of sub-threshold projects to determine if they should be subject to EIA, which are set out in Schedule 7 of the Regulations.

Taking account of the Board's view that the proposal is sub-threshold development, this addendum carries on through the prescribed screening steps for sub-threshold developments.

5. Preliminary Examination

The findings of the 2023 EIASR that that there is significant and realistic doubt in regard to the likelihood of significant effects on the environment arising from the proposed development are unchanged by the proposed amendments.

6. Review against Schedule 7 criteria

Regard is had in this addendum to the criteria set out in Schedule 7 for determining whether development listed in Part 2 of Schedule 5 should be subject to EIA and to the information required by Schedule 7A for the purposes of screening sub-threshold development for EIA as set out in the commentary provided in and below the table which follows.

¹ *Inspector's Report ABP 316312-2, An Bord Pleanála, 29.09.23*

Schedule 7 Criteria	Commentary (‘No change’ means the comments in the comments in the April 2023 EIASR are unaffected by the amendments now proposed.)
1. Characteristics of Proposed Development The characteristics of proposed development, in particular:	
(a) the size and design of the whole of the proposed development	The project area is given as approx. 8.7 ha. The area of works within this is not given but can be seen to be significantly less than this.
(b) cumulation with other existing development 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	It is noted that the An Bord Pleanála Inspector’s report includes a review of other existing and permitted projects and finds that these would not ‘give rise to cumulative effects with the proposed development’. The proposed amendments do not change the finding of the 2023 EIASR in relation to cumulative effects
(c) the nature of any associated demolition works	No change.
(d) the use of natural resources, in particular land, soil, water and biodiversity	No change.
(e) the production of waste,	No change.
(f) pollution and nuisances,	No change.
(g) 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	No change.
(h) the risks to human health (for example, due to water contamination or air pollution)	No change.
2. Location of proposed development The environmental sensitivity of geographical areas likely to be affected by the proposed development, with particular regard to—	
(a) the existing and approved land use	No change.
(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground	No change.
(c) the absorption capacity of the natural environment, paying particular attention to the following areas:	

(i) wetlands, riparian areas, river mouths	No change.
(ii) coastal zones and the marine environment	No change.
(iii) mountain and forest areas	-
(iv) nature reserves and parks	No change.
(v) areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive	-
(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	No change.
(viii) landscapes and sites of historical, cultural or archaeological significance	No change.

<p>3. Types and characteristics of potential impacts</p> <p>The likely significant effects on the environment of proposed development in relation to criteria set out under paragraphs 1 and 2, with regard to the impact of the project on the factors specified in paragraph (b)(i)(I) to (V) of the definition of ‘environmental impact assessment report’ in section 171A of the Act, taking into account—</p>	
(a) the magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected)	No change.
(b) the nature of the impact	No change.
(c) the transboundary nature of the impact	-
(d) the intensity and complexity of the impact	No change.
(e) the probability of the impact	No change.
(f) the expected onset, duration, frequency and reversibility of the impact	No change.
(g) 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	No change.

(h) the possibility of effectively reducing the impact	In addition to the mitigation measures incorporated in the April 2023 proposal as described in the April EIASR, the amended proposal includes further measures for reduction of potential environmental effects, particularly in relation to archaeology, ecology, traffic and parking and tree protection. These measures are described in the supporting documents and set out as recommendations in the Chief Executive's Report.
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Article 120 of the Regulations of 2001 as amended, states that the Schedule 7A information:

- (a) 'shall be accompanied by any further relevant information on the characteristics of the proposed development and its likely significant effects on the environment, including, where relevant, information on how the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive have been taken into account' and
- (b) 'may be accompanied by a description of the features, if any, of the proposed development and the measures, if any, envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment of the development.'

There is no further relevant information arising from other assessments as described at (a) that needs to be considered in this addendum.

In relation to (b); measures to reduce effects of the amendments on the environment are described in the Addendum to the AA Screening and EclA, the Archaeological Assessment, the Traffic & Parking Assessment Report and the Arborist's Report. These measures are all set out as recommendations in the Chief Executive's Report

8 Conclusions

The conclusions of the 2023 EIA Screening Report that phase 1 of the proposed sporting facilities at Shanganagh Park, Co. Dublin does not need to be subject to Environmental Impact Assessment and no Environmental Impact Assessment Report is required for it are unchanged by the amendments to the development as now proposed.