



# Kilbogget EIAR Screening

Proposed floodlighting at Kilbogget Park athletics track and soccer pitch, Cabinteely, Dublin 18.

On behalf of:

Dún Laoghaire-Rathdown County Council

*28 August 2024*



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# 1. INTRODUCTION

## 1.1 Background

This report provides an Environmental Impact Assessment (EIA) Screening for the proposed floodlighting of an existing athletics track and soccer pitch at Kilbogget Park in Cabinteely, Co. Dublin.

The site is located in the south-west of the district park, which measures 41.38 ha in size the site and comprises a playground, 12 playing pitches (GAA, Soccer and Rugby), all weather facilities, an eight-lane world athletics standard running track, boules area, walking and cycling trails, river and wetland and sports buildings.

The proposed development will involve the installation of 34 fixed floodlights in the form of 2no. (P1-P2) 18.29m and 4no. (T1-T4) 21.34m high galvanised steel columns of a similar nature to those used in all-weather pitches throughout the county and with average light levels that accord with the required standards.

The application is being pursued by Dún Laoghaire-Rathdown County Council (DLRCC) and the extents of the site can be seen below in Figure 1.

## 1.2 Aims of Report

This document has been prepared in order to assist DLRCC in the determination of a Part 8 application for the development at the subject site. While the development falls below the threshold for a full EIA, this EIAR Screening Report will assess the possible impacts on the environment of the proposed floodlighting on lands at Kilbogget Park, Cabinteely, Co. Dublin with the aim of contributing to the Council's appraisal of the planned development. Section 2 of this EIA Screening report includes a comprehensive description of the proposed site and planned construction thereon. Section 6.2 of this report sets out how the requirements of Article 299B(1)(b)(ii)(II)(c) of the Planning and Development Regulations 2001-2021 have been considered for the proposal.

## 1.3 Legislation and Guidance

The EIA Screening Report has had regard to the following:

- Planning and Development Act 2000, as amended.
- Planning and Development Regulations 2001 as amended.
- Directive 2014/52/EU of 16 April 2014 amending Directive 2011/92/EU.
- The European Union (Planning and Development) (Environmental Impact Assessment).
- Regulations 2018 (S.I. No. 296 of 2018).
- Guidelines on the information to be contained in Environmental Impact Assessment Reports, Environmental Protection Agency, 2022.
- Interpretation of definitions of project categories of Annex I and II of the EIA Directive, European Commission, 2015.
- Environmental Impact Assessment of Projects: Guidance on Screening, European Commission, 2017.

- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, August 2018, Department of Housing, Local Government and Heritage.
- Environmental Impact Assessment Screening- Practice Note, Office of the Planning Regulator, 2021.



**Figure 1: Proposed development site at Kilbogget Park, Cabinteely, Co. Dublin as denoted by the outer dark blue line** (Source: Musco Lighting)

## 1.4 Overall Methodology

The EIA screening assesses the proposed scheme with reference to the relevant EIA legislation including the EIA Directive, and Planning and Development Regulations. The methodology has particular regard to the ‘3-Step’ assessment process set out in the Office of the Planning Regulator (OPR) Environmental Impact Assessment Screening Practice Note PN02 (June 2021). Regard is also had to the European and National guidance documents noted above.

For the purpose of this application, the relevant statutory provision is Article 103 of the Planning and Development Regulations, 2001 (as amended). Where the local authority concludes, based on such preliminary examination, that—

- there is no real likelihood of significant effects on the environment arising from the proposed development, it shall conclude that an EIA is not required,

- (ii) there is significant and realistic doubt in regard to the likelihood of significant effects on the environment arising from the proposed development, it shall prepare, or cause to be prepared, the information specified in Schedule 7A for the purposes of a screening determination, or
- (iii) there is a real likelihood of significant effects on the environment arising from the proposed development, it shall—
  - (I) conclude that the development would be likely to have such effects, and
  - (II) prepare, or cause to be prepared, an EIAR in respect of the development.

The consideration of potential impacts covers all significant direct, indirect and secondary impacts as relevant having regard to the criteria for determining whether development listed in part 2 of schedule 5 should be subject to an environmental impact assessment under Schedule 7 of the Planning and Development Regulations, 2001 to 2021.

- Characteristics of the proposed development.
- Location of the proposed development.
- Characteristics of potential impacts.

Where a local authority proposes to carry out a sub-threshold development, the authority shall carry out a preliminary examination of, at the least, the nature, size or location of the development.

## 1.5 Structure of Report

This EIA Screening Report is structured to assess the relevant project and environmental criteria as follows:

- Description of site and location
- Description of the proposed development
- The legislative basis for EIA
- Mandatory Threshold Review
- Preliminary Screening Examination
- Screening determination
- Conclusions

## 1.6 Data Sources

The information is obtained from review of several online databases and public sources including:

- Geological Survey of Ireland (GSI) online dataset<sup>1</sup>
- Dún Laoghaire-Rathdown County Development Plan 2022-2028
- DLR Planning Applications
- An Bord Pleanála Planning Applications
- EPA<sup>2</sup>
- National Parks and Wildlife Service<sup>3</sup>

<sup>1</sup> <https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx>

<sup>2</sup> <https://gis.epa.ie/EPAMaps/>

<sup>3</sup> <https://storymaps.arcgis.com/collections/1a721520030d404f899d658d5b6e159a?item=2>

In addition to the above the following project specific reports were utilised to inform this report.

- Screening for Appropriate Assessment: Floodlighting of the Running Track & Soccer Pitch at Kilbogget Park, Dún Laoghaire, Co. Dublin – JBA Consulting
- Ecological Impact Assessment: Floodlighting of the Running Track & Soccer Pitch at Kilbogget Park, Dún Laoghaire, Co. Dublin – JBA Consulting
- Draft Part 8 Report: Proposed Development – Floodlighting of the Running Track & Soccer Pitch at Kilbogget Park PC/PKS/03/24 – DLR Parks Section, Community & Cultural Development Department
- Illumination Summary Report – Musco Lighting

### 1.7 Qualification

This EIA Screening Report has been prepared by Richard Hamilton, BA MSc P.Grad EMAE, MIPI MRTPI. Richard is a Chartered Town Planner with over 28 years experience in public and private sectors in Ireland including the preparation of EIS, EIAR and EIA Screening for infrastructure, commercial and residential development projects. He has a Post Graduate Diploma in Environmental Monitoring Assessment and Engineering (EMAE) from Trinity College Dublin.



## 2. SITE AND LOCATION

### 2.1 Description of the Site and Surrounding Area

Located in southern Cabinteely, bordering Loughlinstown to the south, Cherrywood to the west and Kilbogget to the east, the subject site, as identified in Figure 1 above is approximately 0.45 ha in size. The athletics track and soccer pitch that it encompasses, is situated in the south-west of Kilbogget Park, in proximity to the Shanganagh Vale exit off the N11 and the eastern boundary of the adopted Cherrywood Planning Scheme. Kilbogget Park is approximately 41.38 hectares in size and comprises a playground, playing pitches (GAA and Rugby), all weather facilities, a boules area, walking and cycling trails, river and wetland and sports buildings in addition to the athletics track and soccer pitches subject to potential development. The whole park is located within an urban environment and falls under Objective F of the Dún Laoghaire-Rathdown County Development Plan (DLRCDP) 2022-2028, which aims to provide for open space and active recreational activities. It is not within the boundaries of any DL RCC Local Area Plan.

Though the area directly surrounding the site is open green space, it is within 200 m of areas zoned residential on all sides except the east. Pedestrian walkways and boundary walls, trees and bushes separate the three respective housing estates from the park. Shanganagh Vale housing estate borders Kilbogget Park to the south, Shrewsbury Lawn to the north while the Kilbogget Park housing estate to the west has been assigned as an area for provision of accommodation for the Travelling Community under the DLRCDP.

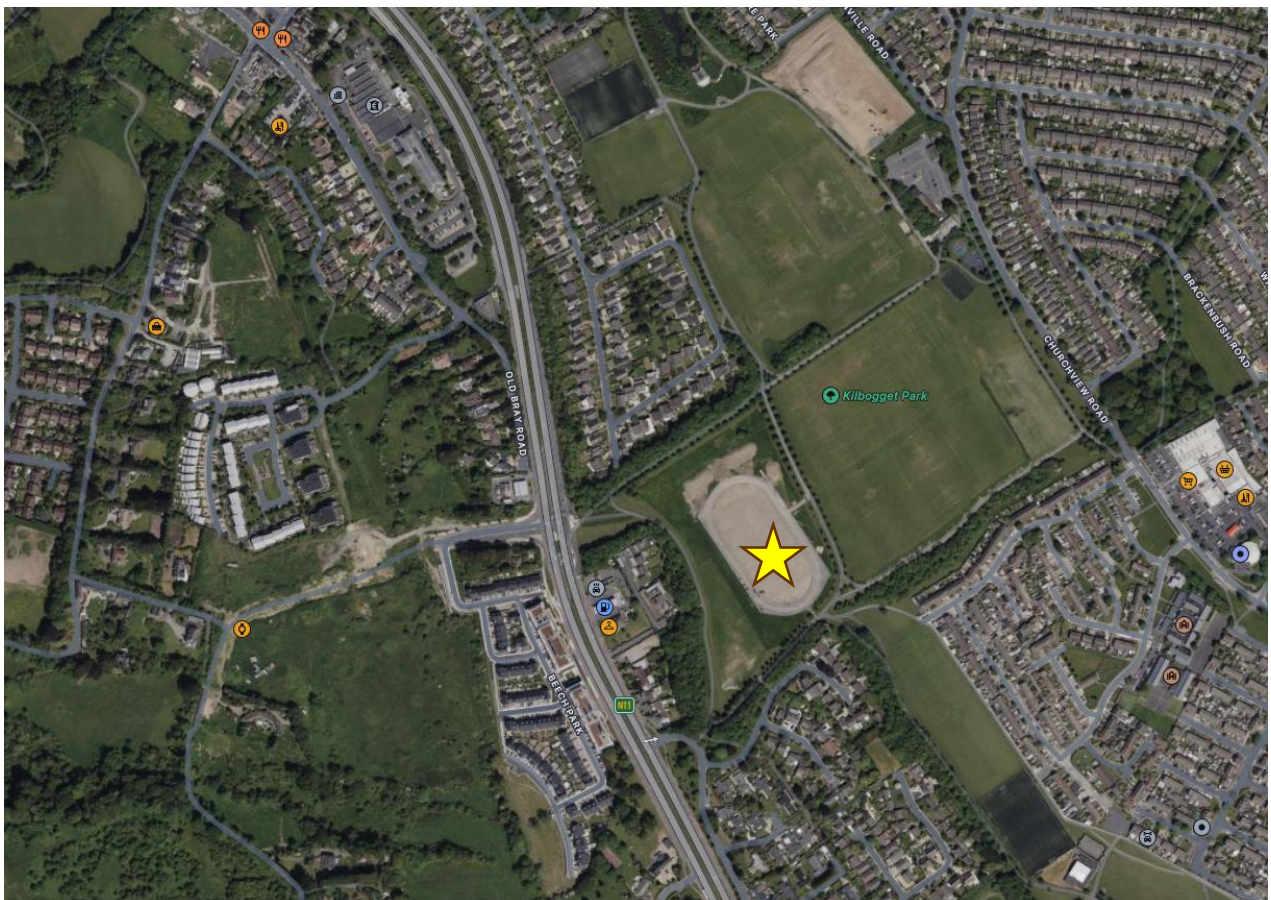


Figure 2: Aerial view of Kilbogget Park and surrounding area (Source: Apple Maps)

The N11 lies just beyond Kilbogget Grove and is considered as a core bus corridor between Bray and the City Centre. The nearest bus stop (3131) and pedestrian park entrance is a 440 m walk from the entrance to the athletics track while vehicular access to locations proximate to the site is either via the N11 through the Shanganagh Vale housing estate or Wyattville Road, the latter providing a route to Ballybrack Carpark.

## 2.2 Environmental Sensitivity of the Site

### 2.2.1 Soils and geology

General data provided by the Geological Survey of Ireland (GSI) indicates that the soil type in the region of Kilbogget Park is classified as Clonroche, which is a fine loamy drift with siliceous stones. This is a mineral soil which drains well. The park's subsoil is classified as a carboniferous limestone till, a sediment deposited by glacier ice by the Environmental Protection Agency (EPA).

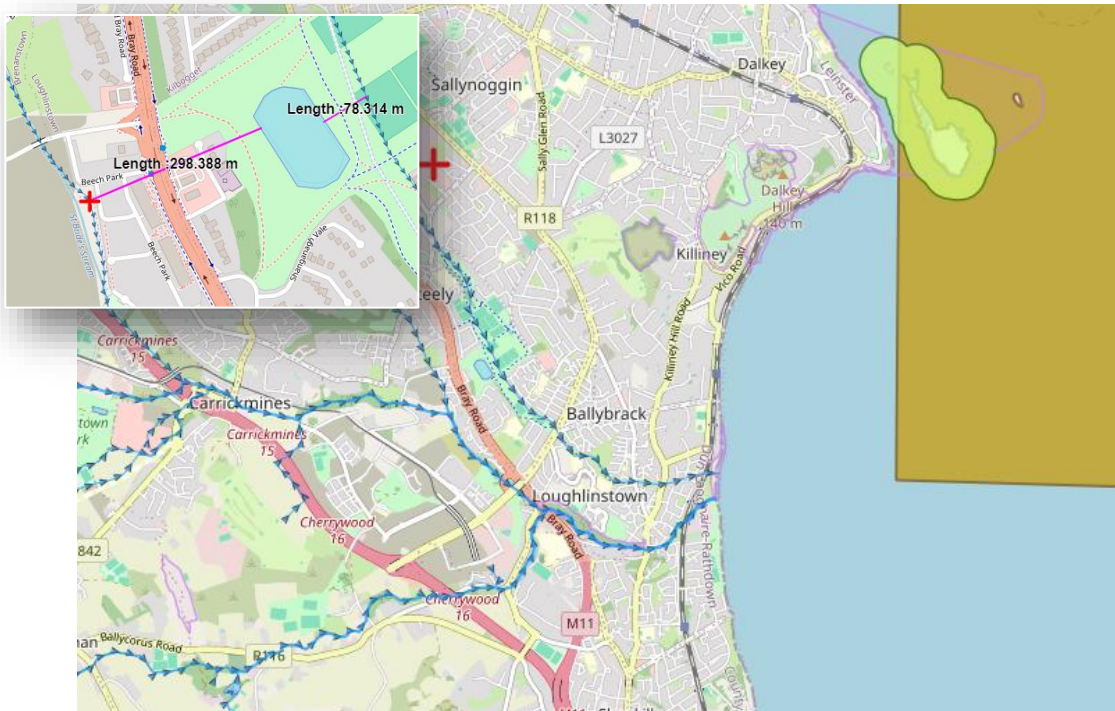
According to the AA screening report *the underlying bedrock of the site is dominated by Granite with Microcline Phenocrysts of the Type 2p microcline porphyritic bedrock formation*. The site's bedrock is considered to be a poor aquifer, providing low yields of groundwater for extraction, and the site is within a region of low groundwater vulnerability. This implies that the groundwater is unlikely to be contaminated by human activities based on the characteristics of the subsoil and presence of karst features. It should be noted that groundwater in the area directly west of the site is moderately vulnerable, but its higher elevation of approximately seven metres makes it unlikely that runoff will occur in that direction.

### 2.2.2 Air quality

The EPA Air Zone designation is 'Zone A' 'Dublin Conurbation'. The site is most proximate to the Dún Laoghaire air quality monitoring station on the Glenageary Road. This station reports an Air Quality Index of 1, implying that the standard of air quality in this area is good.

### 2.2.3 Hydrology

Two EPA Water framework watercourses (Kill-O-The-Grange Stream and Cabinteely Stream) run on either side of the athletics track at distances of between 78 m and 300 m, with flows that are channelled in the direction of Dublin Bay. The Kill-O-The-Grange Stream section proximate to the site is culverted. Their outfalls constitute direct hydrological pathways to the Dalkey Coastal Zone and Killiney Hill pNHA and indirect pathways to the Bray Head SAC/pNHA, Dalkey islands SPA and Rockabill to Dalkey Island SAC. However, there is no direct connection from the site to either watercourse. The AA further notes: *Other waterbodies that are located within the Zol of the project site includes; Stradbrook Stream (Brewery Stream\_010), County Brook (Dargle\_030), Rathmichael Stream (Dargle\_040) and Loughlinstown River North (Shanganagh\_010) ... There are no WFD Transitional or Coastal waterbodies within the vicinity of the site.*



**Figure 3: Watercourses, SACs, SPAs and pNHAs proximate to the proposed development site**

### 2.2.4 Designated sites

There are 41 designated sites within a 15 km radius of the subject site, the nearest of which is Loughlinstown Woods. This proposed NHA site lies 1.2 km south-east of Kilbogget Park. The remainder of the designated sites spread relatively evenly out from the subject site, with the largest of these residing towards the perimeter of the 15 km radius.

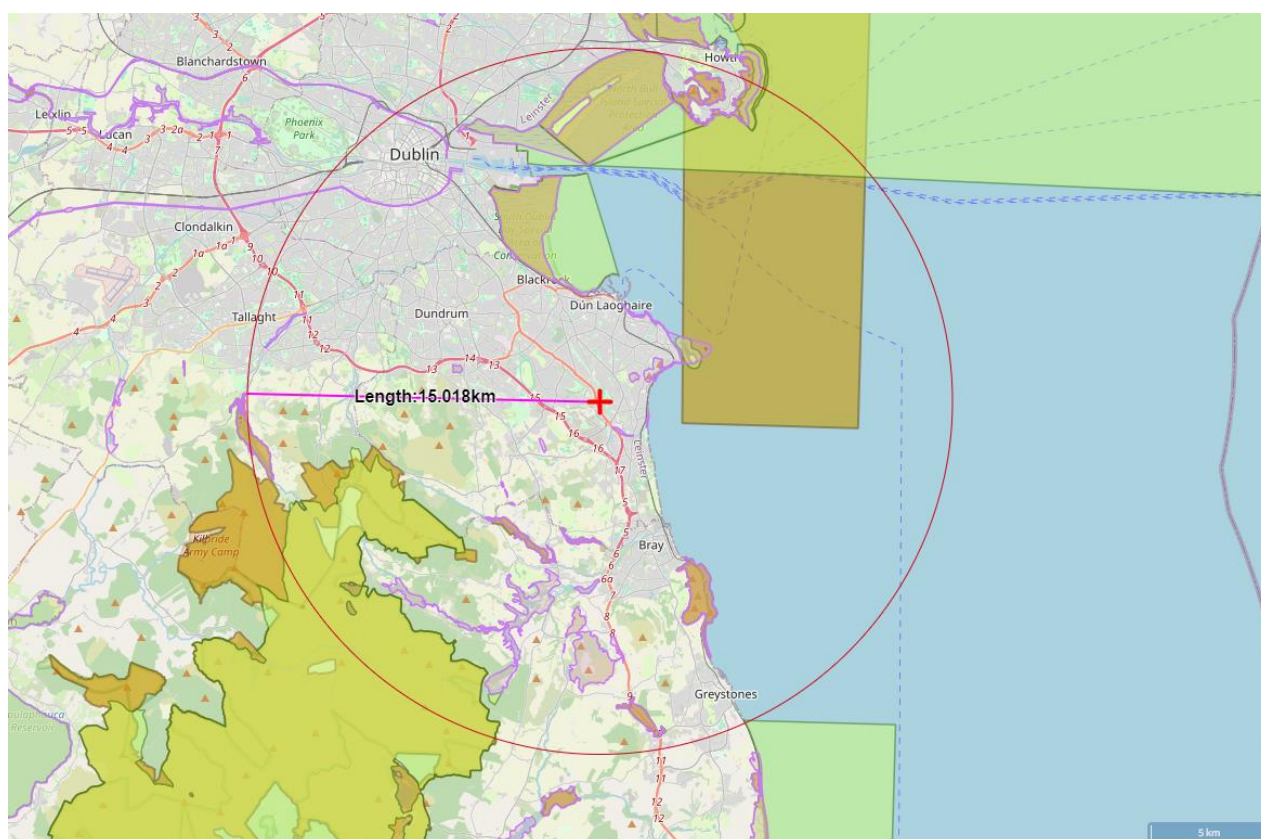


Figure 4: SPAs, SACs and pNHA/NHAs within 15 km of the subject site (Source: EPA)

Screening of European sites and pNHA/NHA’s within 15km of the sites along with their codes and distance from the proposed development are described in Table 1 and illustrated in Figures 4 and 5.

Table 1: Proximity to designated Natura 2000 sites

European Site	Code	Distance
<b>Special Areas of Conservation</b>		
Rockabill to Dalkey Island SAC	IE0003000	3.5 km
South Dublin Bay SAC	IE0000210	4.5 km
Ballyman Glen SAC	IE0000713	5.5 km
Knocksink Wood SAC	IE0000725	6.4 km
Bray head SAC	IE0000714	7.5 km
Wicklow Mountains SAC	IE0002122	8.6 km
North Dublin Bay SAC	IE0000206	10.2 km
Howth Head SAC	IE0000202	12.5 km
Glen of the Downs SAC	IE0000719	12.5 km
<b>Special Protection Area</b>		
Dalkey islands SPA	IE0004172	3.9 km
South Dublin Bay and River Tolka Estuary SPA	IE0004024	4.5 km
Wicklow Mountains SPA	IE0004040	8.7 km
North Bull Island SPA	IE0004006	9.9 km
North-West Irish Sea SPA	IE0004236	10 km
South Dublin Bay and River Tolka Estuary SPA	IE0004024	10.1 km
The Murrough SPA	IE0004186	14.9 km
Howth Head Coast SPA	IE0004113	13.3 km



Figure 5: SPAs and SACs within 15 km of the subject site (Source: EPA)

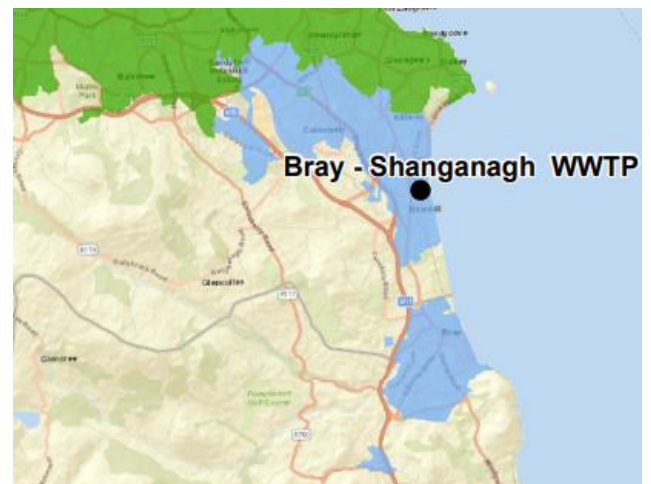
Table 2: Proximity to designated pNHA/NHA sites

pNHA / NHA Site	Designation	Distance
Loughlinstown Woods	Proposed NHA	1.2 km
Dingle Glen	Proposed NHA	3 km
Dalkey Coastal Zone and Killiney Hill	Proposed NHA	3.1 km
Ballybetagh Bog	Proposed NHA	5.5 km
Ballyman Glen	Proposed NHA	6.1 km
Fitzsimon’s Wood	Proposed NHA	6.2 km
Knocksink Wood	Proposed NHA	6.6 km
Boooterstown Marsh	Proposed NHA	7.1 km
South Dublin Bay	Proposed NHA	7.4 km
Dargle River Valley	Proposed NHA	8 km
Bray Head	Proposed NHA	8.6 km
Powerscourt Woodland	Proposed NHA	9.9 km
Glenree Valley	Proposed NHA	10.2 km
Dolphins, Dublin Docks	Proposed NHA	10.2 km
North Dublin Bay	Proposed NHA	10.2 km
Kilmacanoge Marsh	Proposed NHA	10.4 km
Great Sugar Loaf	Proposed NHA	10.5 km
Grand Canal	Proposed NHA	11.6 km
Powerscourt Waterfall	Proposed NHA	12.3 km
Royal Canal	Proposed NHA	12.4 km
Howth Head	Proposed NHA	12.5 km
Glen Of The Downs	Proposed NHA	13.4 km
Dodder Valley	Proposed NHA	13.8 km
Glenasmole Valley	Proposed NHA	14.7 km

### 2.2.5 Effects on the conservation objectives of European sites likely to occur from the project (post mitigation)

Taking into account the small-scale nature of the development along with the project’s adherence to standard construction and operational phase mitigation measures there is little chance that runoff will enter these streams. Wastewater from the Cabinteely area is treated at the Bray-Shanganagh Wastewater Treatment Plant (WwTP) which has available capacity to adequately address the potential adverse effects of wastewater drainage from the site if it were to occur (Uisce Éireann, 2023). No Natura 2000 sites are located within the same groundwater body as the site while low groundwater vulnerability surrounding the site makes it unlikely that indirect pathways to other land-based designated sites will occur as a result of foul or surface water drainage. Thus, **there will be no impact on the conservation objectives of European sites** from

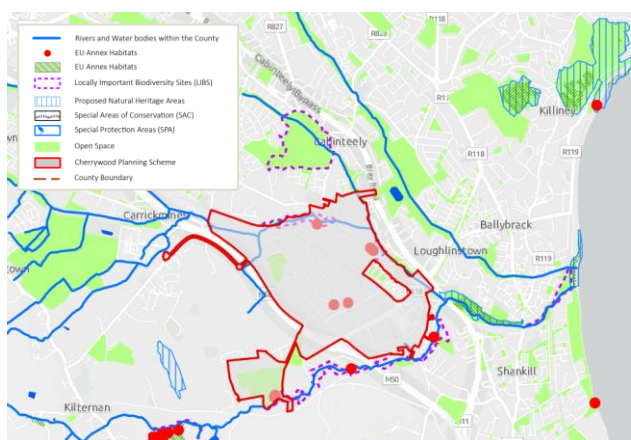
the construction or operation of the proposed development.



**Figure 6: Bray-Shanganagh WwTP catchment and location** (Source: Uisce Éireann)

### 2.3 Species and Habitats

There are no EU Annex I habitats present on site. Downstream of the site along the Cabinteely Stream lies an Alluvial Woodland (91E0) habitat, while at the coastal outflow of the two proximate watercourses there are several different dune (2110; 2120, 2130), vegetated shingle (1220), vegetated sea cliff (1230) and tidal mud and sandflat (1140) habitats.



**Figure 7: Ecological network map** (Source: DLRCDP 2022-2028)



**Figure 8: Layout of pitches in Kilbogget Park** (Source: Cabinteely FC)

Other notable habitats assessed were the amenity grassland, broadleaf woodland, treelines and dry meadows and grassy verges. The woodland on the site was assessed for bat roost and deemed to have poor potential.

However, identification of suitable foraging and commuting habitats precipitated two surveys as a part of the Ecological Impact Assessment (EclA). Three bat species were identified and activity levels were assessed as high.

Seasonal restrictions will be deployed as outlined in the Ecological Impact Assessment (EclA) and AA Screening report to minimize any impacts on bats including no floodlighting allowed in April, August and September.

**Table 3: Scheduled lighting times of the on-site floodlights** (Source: JBA Consulting)

Month	Lighting Schedules
January	06:00-08:00 and 17:00 until 22:00
February	06:00-08:00 and 17:00 until 22:00
March	06:00-08:00 and 17:00 until 22:00
April	No floodlighting allowed
May	No floodlighting allowed
June	06:00-08:00 and 17:00 until 22:00
July	06:00-08:00 and 17:00 until 22:00
August	No floodlighting allowed
September	No floodlighting allowed
October	06:00-08:00 and 17:00 until 22:00
November	06:00-08:00 and 17:00 until 22:00
December	06:00-08:00 and 17:00 until 22:00

Within the DLR Biodiversity Plan, the subject site is located along the Killiney and Dalkey Coastal Wildlife Corridor, considered to be a part of the County-wide Ecological Network. In the follow up ecological site walkover in summer 2024, conducted as part of the Appropriate Assessment (AA) the site was noted to have developed a meadow grassland which was not noted in the initial survey. Habitat mapping was updated and a species list gathered on the basis of this, though no protected flora or fauna were found.

While there were no birds of conservation recorded within the site's boundary during the ecological survey, there were many birds located on adjacent, similar amenity grassland ... None of the breeding birds recorded are QI of Natura 2000 sites within the Zol ... though wintering birds of Green, Amber and Red conservation concern were located within the nearby football pitches (AA screening report). The report also states that it has been noted by members of DLRCC through anecdotal evidence that more recently, the Brent Goose have used the fenced-off area of the athletics track in the centre of the site ... for foraging. The construction phase will take place outside of the wintering bird season and therefore will not impact foraging within Kilbogget Park.

## 2.4 Heritage

There are no notable heritage sites within the boundaries of Kilbogget Park. The closest recorded monuments lie directly across the N11 and are comprised of a Burial Ground (026-119) and Fulacht Fia (026-159). Kilbogget House, a protected structure, (RPS: 1671) is located beyond Shanganagh Vale housing estate while

the nearest Architectural Conservation Area is in Foxrock. It is not deemed that provisions will be required for any of these sites or buildings as a result of the proposed development.

## 2.5 Landscape and Visual Context

The landscape surrounding the site is that of Kilbogget Park an amenity grassland set within an urban environment. Outside the perimeter of the athletics track is a fence which marks the boundary of Pitch 9. This borders a tree-lined pedestrian walkway/cycle track. Dense foliage forms the south-western boundary of this section of the park while an open expanse of sports fields stretch to the east. Despite the site's close proximity to several housing estates, the boundary of trees provides a visual barrier (see Figure 9).



**Figure 9: Aerial view of Kilbogget athletics track** (Source: Google Earth)

## 2.6 Human Beings

The subject site is located in the midst of three mature suburban housing estates and approximately 200 m from the N11.

Shanganagh Vale housing estate borders Kilbogget Park to the south, Shrewsbury Lawn to the north while the Kilbogget Park housing estate to the west has been assigned as an area for provision of accommodation for the Travelling Community under the DLRCDP. To the west of the N11 is located the recently constructed Beech Park residential area (including houses and apartments fronting onto the road corridor). There are mature suburban communities to the east of Kilbogget Park along Churchview Road, including Coolevin/Willow Vale to the south east, Brackenbush Park/Watson Estate to the east and Granville Road to the north east.

### 2.6.1 Population

The total population of Dún Laoghaire-Rathdown recorded in the Census 2022 was 233,860 (Census 2016 was 218,018); an increase of 7.1%.



The site is located within the Killiney-Shankill Local Electoral Area which grew 16% from 2016 to 2022 (population 39,352).

At a more local level the site is located within the Cabinteely-Kilbogget Electoral Division. The population remained static from 2,686 in 2016 to 2,683 in 2022. Small area statistics are shown in the table below. Ref. 267037002 includes Shanganagh Vale Estate to the south. Ref. 267037004 includes Shrewsbury Lawn to the north.

**Table 4: Percentage population increase in housing estates surrounding the subject site (Source: CSO)**

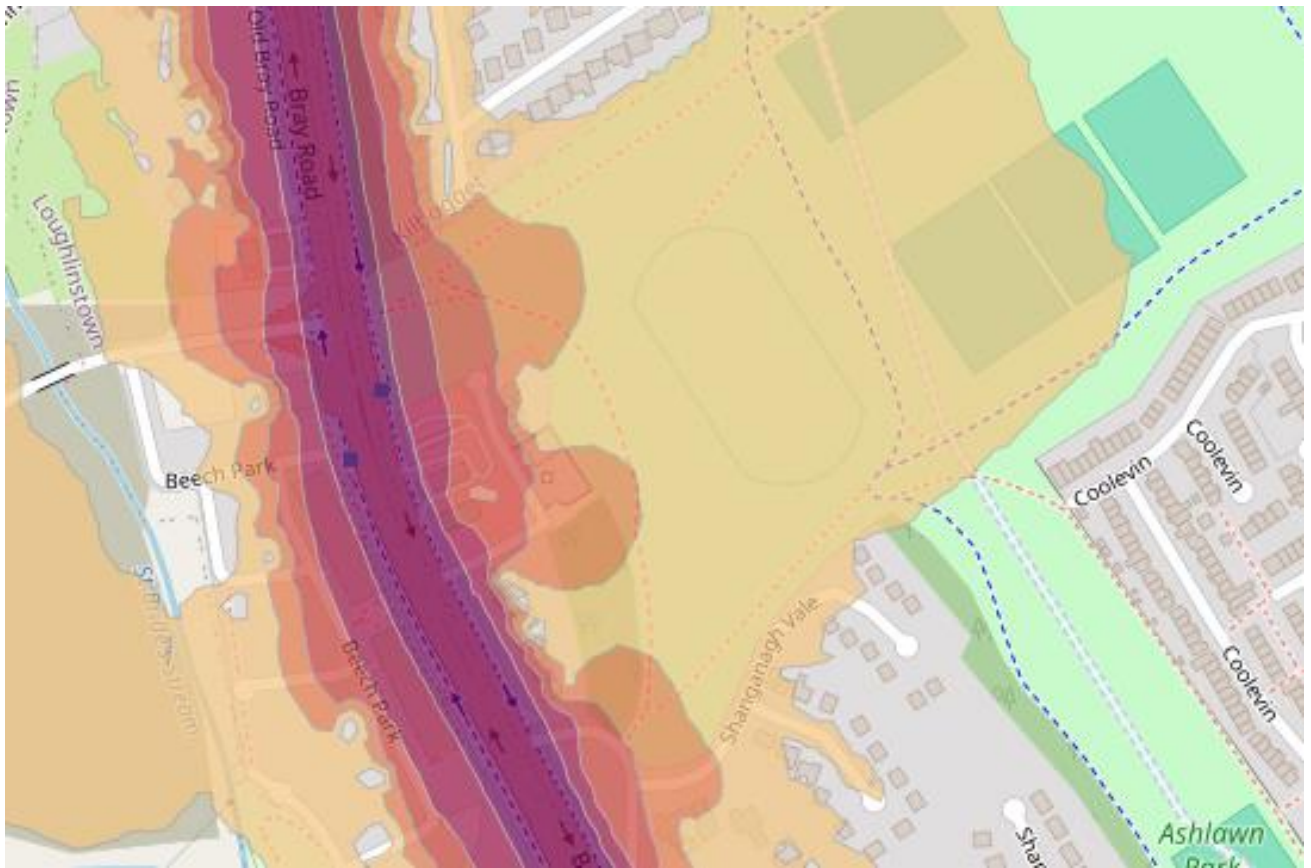
Small Area	2016	2022	Change	% Change
267037002	294	318	+24	8.16
267037004	209	233	+24	11.48
<b>Total</b>	503	551	+48	9.54

Tesco Ballybrack is the nearest commercial centre (to the east on Church Road) There are a number of commercial activities in close proximity to the site. Cabinteely Village is located on the far side of the N11 to the north west.

Scoil Colmcille, St. Laurance College and Cabinteely Community School are located in close proximity of the site.

## 2.6.2 Noise

Increased noise from evening-time usage of the pitch and/or from construction of the columns is considered as unlikely to have a significant effect on residents in the area of the subject site, based on the urban location of the pitch and its proximity to the N11 national road. Noise maps for the area (Figure 11 below) illustrate that the N11 is the dominant noise source in the locality. The park is already used for recreation activity including floodlit pitches. The floodlights have potential to extend the hours of operation in this segment of the park.



**Figure 10: Day, Evening and night noise contours of major roads in the vicinity of subject site** (Source: EPA)

## 3. PROPOSED DEVELOPMENT

### 3.1 Introduction

DLRCC is proposing an application for the installation of six (2 no. (P1-P2) 18.29 m and 4 no. (T1-T4) 21.34 m high) galvanised steel columns similar to those used in the all-weather pitches throughout the county. These will be constructed along the athletics track's perimeter with lights shining in towards the pitch. T1-T4 will be constructed along opposing sides of the length of the pitch while P1 and P2 will be positioned along the widths (see Figure 11). The construction work will include the installation of said floodlighting columns including associated civil works (foundations, ducting installation of mini pillars etc.) and all electrical controls and switches will be brought to an area adjacent to the track. The proposed foundations for the lighting columns will be approx. 2-3 m deep and cabling and ducting approx. 650 mm deep. The required three-phase power connection and associated ESB substation will also be located in close proximity to the track access gate.



**Figure 11: Position of columns around the Kilbogget athletics track** (Source: Musco Lighting)

The floodlighting for the pitch requires 250 lux level average and the floodlighting for the athletics track has been designed to achieve an average light level of 200 lux, in accordance with World Athletics Standards. The lights will provide only the amount of light necessary for the task in hand and shield against light emitted beyond the track's perimeter in order to avoid creating glare or omitting light above the horizontal plane.

Overall, the intention of the proposed development according to the draft Part 8 Report is to *provide community facilities for local clubs and groups and ensure a long-term and sustainable use for the Athletics running track and soccer pitch.*

### 3.2 Landscape

The proposed development will not significantly alter the physical landscape of Kilbogget Park or stand out within its overall context as it is consistent with the existing land use. All ancillary developments such as the ESB substation will be located in close proximity to the track itself. Visibility of the columns from the surrounding residential areas will be minimal as a result of their tree lined boundaries.

#### 3.2.1 Visual Impact

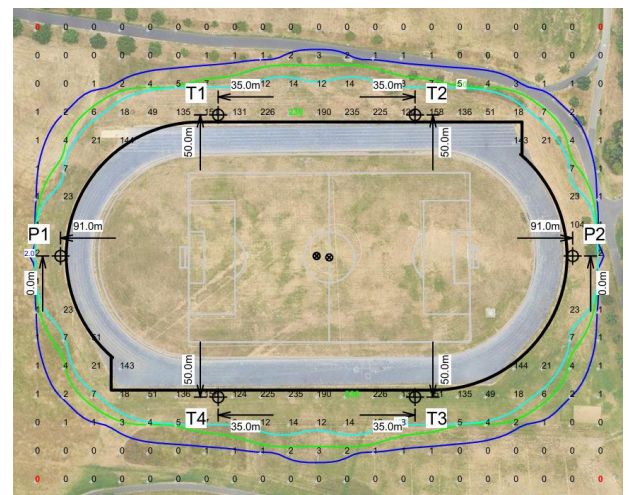
##### 3.2.1.1 Day time use

The floodlights will generally not be of visible note during the day, even within the stadium, as the lux level (200-250 lux) is significantly lower than that of an overcast afternoon (1,000 – 2,000 lux).

This includes the period from sunrise to sunset on clear days (400 lux). On cloudy mornings and evenings (40 lux) or in conditions of thick cloud cover (<1 lux), the lux level of the proposed lights may exceed that of the sun’s intensity.

The expert lighting report considers it will not impact the surrounding residential areas as the light spill from the stadium is confined to within 30 m of its bounds (see Figure 132 below). The maintained maximum vertical lux reaches the pedestrian

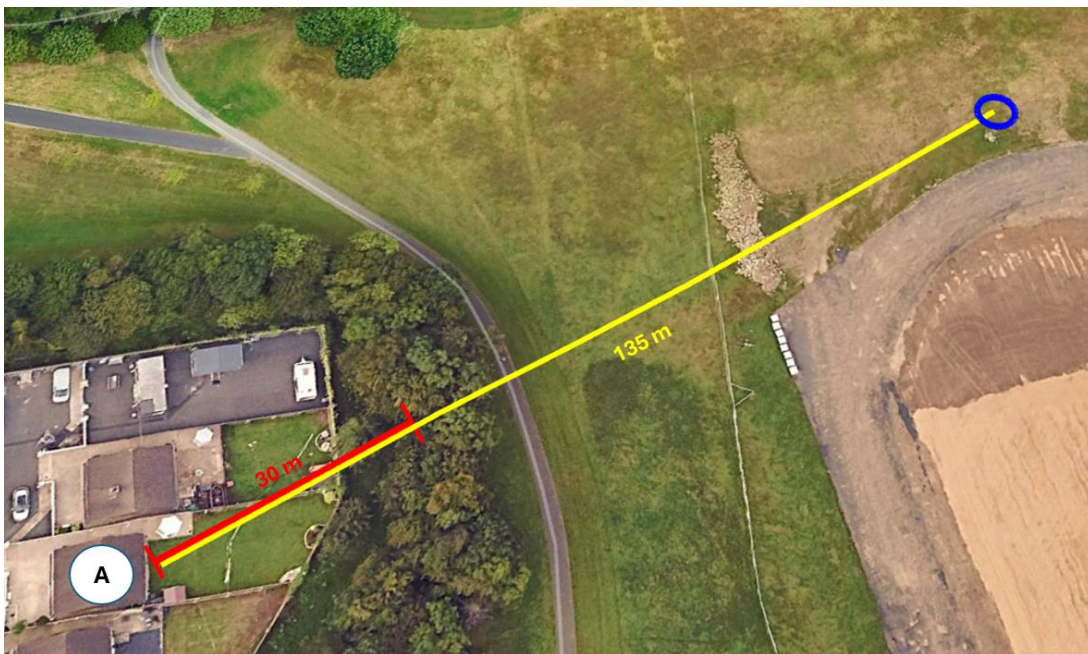
walkway only on the south-east of the stadium, and here the maximum lux level is 7, equating to the lighting of a dimly lit street.



**Figure 12: Maximum vertical lux grid surrounding Kilbogget athletics track** (source: Musco Lighting)

The columns themselves will be visible within the park, in a similar manner to those surrounding the pitch to the south-east of the clubhouse.

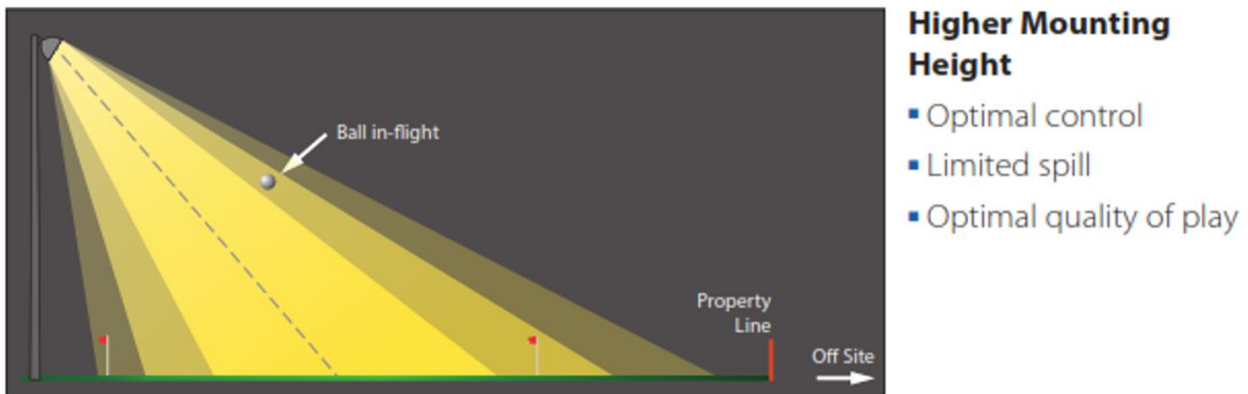
They are also unlikely to have a visual impact on the surrounding residential areas. For example Kilbogget Grove's house A in Figure 12, which is approximately 30 m removed from the treeline and at a distance of 135 m from the most likely visible column. With an average tree height of 13 m, the angle between observer and tree is significantly higher ( $23.5^\circ$ ) than that to the top of the column ( $7.6^\circ$ ), resulting in visibility of the column being blocked entirely by the trees during the summer months. It is unlikely that the columns will be of note through the trees during the winter either due to the density of branch cover and similar vertical structure.



**Figure 13: Distances between column, treeline and house A** (source: Google Earth)

### 3.2.1.2 Night time use

The floodlighting will be operational between 6.00am and 22.00pm throughout the week. The impact of light spill after dark is only relevant between late August and early April. This is further reduced by floodlight usage not being permitted in April, August or September (see Table 3 above). According to the Part 8 Report *the floodlighting design undertaken uses the latest floodlighting design technology to reduce the impact of light spill on adjoining lands, trees, and hedgerows. The lighting design has been prepared in compliance with the Institute of Lighting Professionals (ILP), Guidance Note for the Reduction of Obtrusive Light GN01:2021 and Guidance Note for Bats and Artificial Lighting in the UK GN08:2018. The lights will provide only the amount of light necessary for the task in hand and shield the light given out in order to creating glare or omitting light above the horizontal plane.*



**Figure 14: Mounting height and its impact on lighting spill** (Source: Part 8 Report)

Pitch size, the sport being played, competition level and the application of the floodlighting system are taken into account in order to ensure that the aiming angle of the lights is appropriate to control the glare as well as to ensure good playability. Based on the Illumination Summary Report the highest level of vertical illumination to reach any of the residential areas surrounding the development is 0.00 lux. Light spill at night will therefore not have an impact on nearby housing estates.

### 3.3 Scope of the Works

#### 3.3.1 Site Compound Arrangements

The site compound setup for the construction phase is addressed in the EclA, where the following is proposed:

*It is preferred that the works compound be located in the amenity grassland in the north-east of the site, that it is not in close proximity to treelines, individual trees, or the meadow of higher value.*

- Only plant and materials necessary for the construction of the works will be permitted to be stored at the compound location.
- Site establishment by the Contractor will include the following:
  - Site offices;
  - Site facilities (such as canteen, toilets, drying rooms, etc.);
  - Secure compound for the storage of all on-site machinery and materials;
  - Temporary car parking facilities;
  - Temporary fencing;
- Site Security to restrict unauthorized entry;
- Bunded storage of fuels and refuelling area. Bunds shall be 110% capacity of the largest vessel contained within the bunded area.
- A separate container will be located in the Contractors compound to store absorbents used to contain spillages of hazardous materials. The container will be clearly labelled, and the contents of the container will be disposed of by a licenced waste contractor at a licenced site. Records will be maintained of material taken off site for disposal.
- A maintenance programme for the bunded areas will be managed by the site environmental manager. The removal of rainwater from the bunded areas will be their responsibility. Records will be maintained of materials taken off site for disposal.
- The site environmental manger will be responsible for maintaining all training records.

- *Drainage collection system for washing area to prevent run-off into surface water system.*
- *Wherever reasonably practical, refuelling of vehicles will be carried out off site to reduce risk of accidental hydrocarbon pollution events.*

### 3.3.2 Pollution Control and Spill Prevention

*The EclA recommends that: A minimum stock of spill kits will be maintained at all times and site foremen's vehicles will carry large spill kits at all times. Absorbent material will be used with pumps and generators at all times and used material disposed of in accordance with the Waste Management Plan. Regular inspections and maintenance of plant and machinery checking for leaks, damage or vandalism will be made on all plant and equipment.*

*In the event of a spill the Contractor will ensure that the following procedure are in place:*

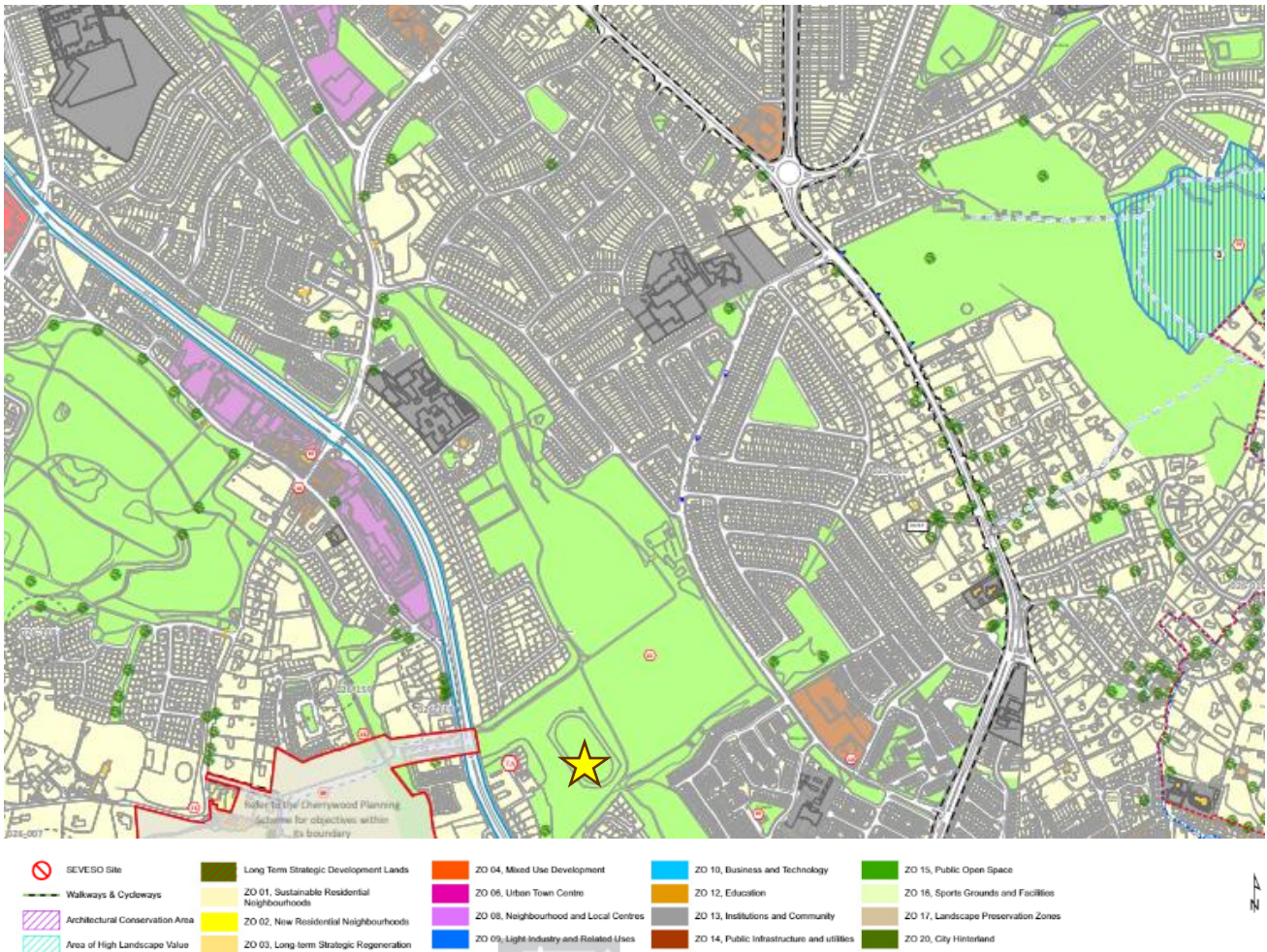
- Emergency response awareness training for all Project personnel on-site works.
- Appropriate and sufficient spill control materials will be installed at strategic locations within the site.
- All potentially polluting substances such as oils and chemicals used during construction will be stored in containers clearly labelled and stored with suitable precautionary measures such as bunding within the site compound.
- Oil soakage pads should be maintained on-site to enable a rapid and effective response to any accidental spillage or discharge. These shall be disposed of correctly and records will be maintained by the environmental manager of the used booms and pads taken off site for disposal.
- Damaged or leaking containers will be removed from use and replaced immediately.

## 4. PLANNING POLICY

### 4.1 Dún Laoghaire Rathdown County Development Plan 2022 - 2028

The current Statutory Development Plan for the project area is the Dun Laoghaire Rathdown County Development Plan 2022-2028 (CDP) which came into effect from 21<sup>st</sup> April 2022. The following relevant policies and objectives are noted.

**Zoning:** The site zoning is *Objective F – to preserve and provide for open space with ancillary active recreational amenities*. The proposed works are entirely consistent with zoning objective F.



**Figure 15: Land Use Zoning of site under Dun Laoghaire Rathdown County Development Plan 2022-2028**

The development will tie in with the relevant national and regional policy as well as the following specific policies outlined in the County Development Plan 2022-2028 which is the relevant statutory planning context governing the subject site;

Policy Objective OSR3: Future Improvements

It is a Policy Objective to continue to improve, plant and develop more intensive recreational and leisure facilities within parks and public open spaces insofar, as resources will permit, while ensuring that the development of appropriate complementary facilities does not detract from the overall amenity of the spaces.



#### Policy Objective OSR5: Public Health, Open Space and Healthy Placemaking

It is a Policy Objective to support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan (NPAP) 2016, to increase physical activity levels across the whole population thus creating a society, which facilitates people whether at home, at work or at play to lead a more active way of life (consistent with RPO 9.16).

#### Policy Objective OSR9 – Sports and Recreational Facilities

It is a Policy Objective to promote the provision, and management of high-quality sporting, and recreational infrastructure throughout the County, in accordance with the National Sports Policy 2018-2027, and *dlr Space to Play: a new approach to Sports Facilities Strategy*, 2017-2022, to ensure that the needs of different groups are incorporated into the planning and design of new facilities.

#### Policy Objective OSR10: Protection of Sports Grounds/Facilities:

It is a Policy Objective: • To ensure that adequate playing fields for formal active recreation are provided for in new development areas. • That existing sports facilities and grounds within the established urban area are protected, retained, and enhanced. • To increase the number of playing pitches in the County. • To maximise the use of playing pitches in the County and for playing pitches to be utilised seven days a week, subject to protecting adjoining residential amenity.

#### Policy Objective PHP13:

It is a Policy Objective to promote equality and progressively reduce all forms of social exclusion that can be experienced because of gender, gender identity, marital status, family status, age, race, religion, disability, sexual orientation, nationality, homelessness, and membership of the Traveller Community and promote active participation consistent with RPO 9.1 and RPO 9.2 of the RSES.

#### Policy Objective EI15: 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.

#### 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.

#### Specific Local Objective 67

To upgrade and improve Kilbogget Park in accordance with the future approved Masterplan.

## **4.2 Space to Play – Dún Laoghaire – Rathdown County Council Sports Facilities Strategy 2017-2022:**

The strategy sets out a logical, deliverable pathway for the optimum use of existing, and the development of new public sporting and physical activity facilities within the County. This strategy is referenced in OSR9 of the current CDP and was compiled with reference to the existing *County Sports Participation Strategy; Dlr Open Space Strategy, the National Physical Activity Plan, Sport Ireland research through the Irish Sports Monitor on the*

changing trends within sport; and an understanding from overseas on the optimum way to approach the provision of facilities to populations similar in size to that of Dún Laoghaire-Rathdown.

Under the strategy, the development of All Weather facilities for soccer practice is noted as a goal, while the importance of the athletics track at Kilbogget Park is specifically stated due to the closure of UCD’s athletics track. The overall scarcity of sporting facilities, particularly for the larger field sports, requires *greater flexibility in the scheduling of matches* to accommodate for the high demand. This need is supported by adequate lighting of pitches which extends the timeframe in which matches can be played, especially during the winter months.

### 4.3 Planning Permissions

In order to consider the potential for Cumulative Development impacts, planning applications in the vicinity of the subject site have been reviewed.

**Table 5: Relevant planning applications in the vicinity of the subject site** (source: DLR)

Plan Registration Reference	Location	Proposal	Registered Date	Decision
D15A/0239	Kilbogget Grove	Continued use of the existing 20m high, free standing mono-pole type communications structure	10/04/2015	Granted
D24B/0228/WEB	Denton, Bray Road	Amendment to extension currently under construction inc. upper floor windows	03/07/2024	Granted
D24A/0278/WEB	Circle K, Eglinton Service Station	Relocation of previously approved car wash bay structure, new boundary treatment to include 2.4 m high fence along western boundary and other minor amendments	17/04/2024	Granted

## 5. SCREENING

### 5.1 Methodology

This section sets out the legislative basis for 'Screening' so as to decide whether or not the floodlighting project requires the preparation of Environmental Impact Assessment Report (EIAR) as part of an application.

The basis for this assessment is whether the proposed project exceeds mandatory "thresholds" or is considered to have a potential impact on "sub-threshold" criteria set out under legislation.

The EIA Screening Report has had regard to the following:

- Planning and Development Act 2000, as amended
- Planning and Development Regulations 2001, as amended
- Directive 2014/52/EU of 16 April 2014 amending Directive 2011/92/EU
- Interpretation of definitions of project categories of annex I and II of the EIA Directive, European Commission, 2015
- The European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018)
- European Union (Roads Act 1993) (Environmental Impact Assessment) (Amendment) Regulations, 2019 (S.I. 279/2019)
- EPA Guidelines on information to be contained in Environmental Impact Statements (2022)
- Environmental Impact Assessment of Projects: Guidance on Screening, European Commission, 2017
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment August 2018
- Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding Sub-threshold Development 2003
- Circular Letter PL 8/2017 (DHPLG), as revised by Circular Letter 05/2018 – Implementation of Directive 2014/52/EU on the effects of certain public and private projects on the environment (the EIA Directive) – Advice on Electronic Notification Requirements (Circular Letter PL 8/2017).
- Circular Letter: PL 10/2018 22 November 2018 Public notification of timeframe for application to An Bord Pleanála for screening determination in respect of local authority or State authority development
- Office of the Planning Regulator (May 2021) Environmental Impact Assessment Screening- Practice Note.

### 5.2 Preliminary Examination in the Context of Proposed Development

The Office of the Planning Regulator has issued guidance in the form of the Environmental Impact Assessment Screening- Practice Note, May 2021 which aids Planning Authorities as the Competent Authority (CA) in this area. This report has had regard to the OPR guidance and methodology which sets out a 3 Step Process illustrated in Figure 16, Figure 17 and 18.

The proposed application is a 'project' for the purpose of Environmental Impact Assessment (EIA) under Stage 1 stage (a) of the OPR guidance.

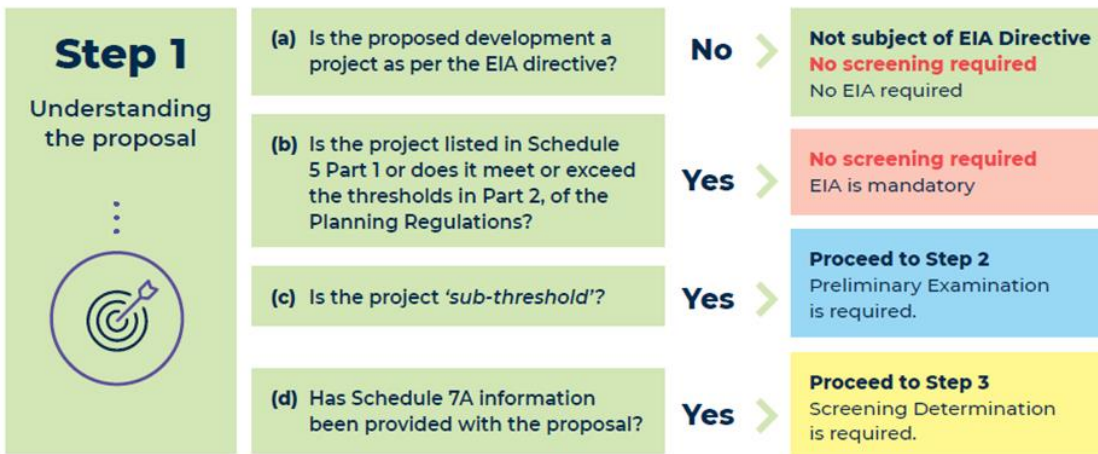


Figure 16: Extract from the OPR Guidance Note (Step 1) (Source: OPR)

### 5.3 Mandatory EIAR Threshold Review

A list of the types or classes of development that require EIA or screening for EIA is provided in Part 1 and Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended. 'Sub-threshold development' comprises development of a type that is included in Part 2 of Schedule 5, but which does not equal or exceed a quantity, area or other limit (the threshold).

Sub-threshold projects in Schedule 5 Part 2 require screening for EIA, except in cases where the likelihood of significant effects can be readily excluded. Schedule 5 Part 2 provides the following relevant projects/thresholds.

Mandatory	Regulatory Reference	Response
<p>10. Infrastructure projects</p> <p>(b)(i) Construction of more than 500 dwelling units.</p> <p>(ii) Construction of a car-park providing more than 400 spaces, other than a car-park provided as part of, and incidental to the primary purpose of, a development.</p> <p>(iii) Construction of a shopping centre with a gross floor space exceeding 10,000 square metres.</p> <p>(iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, <b>10 hectares in the case of other parts of a built-up area</b> and 20 hectares elsewhere</p> <p>(In this paragraph, "business district" means a district within a city or town in which the</p>	<p>Planning and Development Regulations 2001-2021, Schedule 5, Part 2</p>	<p>European Commission guidelines suggest that projects with similar characteristics are not explicitly mentioned in the EIA Directive could include: bus garages, train depots; construction projects such as housing developments, hospitals, universities, sports stadiums, cinemas, theatres, concert halls and other cultural centres. The underlying principle is that all these project categories are of an urban nature and that they may cause similar types of environmental impact. Projects to which the terms 'urban' and 'infrastructure' can relate, such as the construction of sewerage and water supply networks, could also be included in this category.</p> <p>As such, the project is considered an 'urban development' that falls under this</p>

<p>predominant land use is retail or commercial use.)</p>		<p>threshold definition.<sup>4</sup> The project located within the DLR built up area. Its area is under the 10 hectares in 'in case of other parts of a built-up area'.</p> <p><b>Mandatory Threshold Trigger not reached.</b></p>
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In relation to proposed development none of the above thresholds above are exceeded. Accordingly, the project is sub threshold development and under Step 1(b) of the OPR guidance a preliminary examination is required under Step 2<sup>5</sup>.

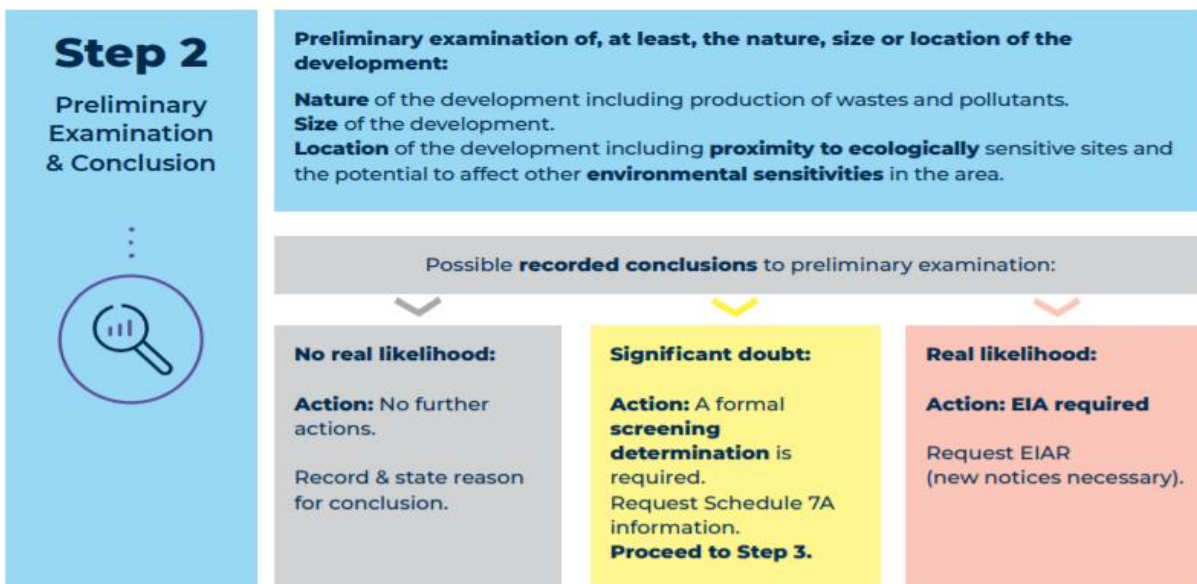


Figure 17: Extract from the OPR Guidance Note (Step 2) (source: OPR)

### 5.4 Preliminary Examination Considerations

Preliminary examinations must consider at least the following:

- The nature of the development including the production of wastes and pollutants;
- The size of the development; or
- The location of the development including the potential to impact on certain ecologically sensitive sites and the potential to affect other environmentally sensitive sites in the area.

The OPR guidance states a number of questions to assist the preliminary examination.

<sup>4</sup> European Commission (2015) Interpretation of definitions of project categories of annex I and II of the EIA Directive, pp.50-52

<sup>5</sup> Art 120 (1) (a) of the Planning Regulations provides that; “where the authority proposes to carry out a subthreshold development, the authority shall carry out a preliminary examination of, at the least, the nature, size or location of the development”.

#### 5.4.1.1 Nature of the development

***i) Is the nature of the proposed development exceptional in the context of the existing environment?***

The proposed development seeks to install floodlighting on the perimeter of an athletics track and soccer pitch in Kilbogget Park. The land surrounding the site falls under Objective F of the DLRCDP which aims to provide for active recreational activities. There are currently 10 other pitches located within the park, two of which are all weather. Another area of the park has already installed floodlighting. Considering the development's similarity to previous developments in and the current objective of the area it is not considered as exceptional in the context of the existing environment.

***ii) Will the development result in the production of any significant waste, or result in significant emissions or pollutants?***

The proposed development will not require site clearance or involve the production of any significant amount of waste material via the demolition of currently existing infrastructure. During the construction phase, any waste generated from the proposed development will be dealt with in the appropriate manner in accordance with the appropriate standards and best practice methodology. All construction works will be contained within the confines of the site. During the operation phase, the nature of the development will give rise to light emissions from the floodlights and noise emissions associated with potentially more intensive use of the facilities. Mitigation measures are proposed in terms of the technical specification and calibration of the lighting as well operational time limits.

#### 5.4.1.2 Size of the development

***iii) Is the size of the proposed development exceptional in the context of the existing environment?***

The development will result in the construction of 2no. 18.29m and 4no. 21.34m high galvanised steel columns and their associated civil works. The proposed site is 0.45 ha within a 41.38 ha park, and once constructed the columns will take up significantly less GFA than that proposed in the plan. It should be noted that the height of the columns exceed that of the majority of surrounding structures, however, the surrounding open space, distance between the columns and nearby residential areas along with the tree-lined boundary of the park counter issues of their visibility. Therefore, the size of the proposed development is not considered exceptional within the confines of Kilbogget Park.

***iv) Are there cumulative considerations having regard to other existing and/or permitted projects?***

A search for planning applications on and surrounding the site was performed. No permissions of scale were noted. There are existing floodlights for playing pitches to the east (Seapoint Rugby Club) adjoining Churchview Road and to the north at the Astro-turf pitches. There are therefore potential for cumulative lighting impacts.

#### 5.4.1.3 Location of the development

***v) Is the proposed development located on, in, adjoining or does it have the potential to impact on an ecologically sensitive site or location?***

The site is not located within or adjacent to any European sites. Potential indirect impacts were considered using the source-pathway-receptor model. Impacts from construction of the proposed development on downstream habitats will be negated by the mitigation measures noted in earlier sections. Thus it has been

concluded that there are no feasible pathways to or impact on the conservation objectives of European sites from the proposed development.

***vi) Does the proposed development have the potential to affect other significant environmental sensitivities in the area?***

The AA screening determined that the proposed project is not anticipated to impact on the qualifying interests of the Natura 2000. The site is situated in an parkland area adjoining stands of trees. Bat activity has been recorded in the area.

It is noted that light omitted from the subject site is bat sensitive and will not radiate more than 5 lux into habitats of higher quality post construction. Mitigation in the form of light cowling and orientation, along with seasonal variation in lighting time schedule will prevent the site from experiencing large scale light pollution and allow the site to continue experiencing light levels in line with existing conditions. The EclA concludes that *provided the development is constructed in accordance with the mitigation measures outlined ... there will be no significant impacts alone or in combination with other plans as a result of the development and associated works on the ecology and local species of the area.*

The site is situated is close proximity to residential neighbourhoods with potential to cause impact on residential amenity. During the operation phase, the nature of the development will give rise to light emissions from the floodlights and noise emissions associated with potentially more intensive use of the facilities. Mitigation measures are proposed in terms of the technical specification and calibration of the lighting as well operational time limits.

## **5.5 Preliminary Examination Conclusion**

Following the preliminary examination, it is concluded that there are doubts regarding the likelihood of significant effects on the environment arising from the location of the proposed floodlighting development and the proximity of sensitive receptors. It is necessary to proceed to a Step 3 assessment as per the OPR Guidelines.

## 6. SCREENING DETERMINATION


Where the requirement to carry out EIA is not excluded at preliminary examination stage, the competent authority must carry out a screening determination.

The screening determination carried out on the basis of the Schedule 7A. In making its screening determination, the competent authority must have regard to:

- Schedule 7 criteria,
- Schedule 7A information,
- Any further relevant information on the characteristics of the development and its likely significant effects on the environment submitted by the applicant,
- Any mitigation measures proposed by the applicant,
- The available results, where relevant, of preliminary verifications or assessments carried out under other relevant EU environmental legislation, including information submitted by the applicant on how the results of such assessments have been taken into account (see Box 3), and
- The likely significant effects on certain sensitive ecological sites

**Step 3**

Formal  
Screening  
Determination



**Screening Exercise:**  
**Is the proposal likely to have significant effects on the environment?**

In making the determination, the planning authority must have regard to Schedule 7 criteria, Schedule 7A information, results of other relevant EU assessments, the location of sensitive ecological sites, or heritage or conservation designations. Mitigation measures may be considered.

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**Screening Determination:** Recorded outcomes to screening determination must state main reasons and considerations, with reference to the relevant criteria listed in Schedule 7 of the Regulations and mitigation if relevant.

*Figure 18 Extract OPR Guidance Note (Step 3)*

### 6.1 Criteria for determining whether development should be subject to an environmental impact assessment

The 'Environmental Impact Assessment (EIA) Guidance for Consent Authorities Regarding Sub-Threshold Development', groups criteria for deciding whether or not a proposed development would be likely to have significant effects on the environment under three headings which correspond to the updated Schedule 7. Schedule 7 criteria for determining whether development listed in part 2 of Schedule 5 should be subject to an environmental impact assessment.

- Characteristics of the proposed development.
- Location of the proposed development.
- Characteristics of potential impacts.



Schedule 7 Criteria Commentary	Schedule 7 Criteria Commentary
<p><b>1.Characteristics of proposed development</b> The characteristics of proposed development, in particular to:</p> <p>-</p>	
<p>a) the size of the proposed development,</p>	<p>The development will result in the construction of 2no. 18.29m and 4no. 21.34m high galvanised steel columns and their associated civil works. The proposed site is 0.45 ha within a 41.38 ha park. The size of the development is proportionate to the existing running track and pitch.</p>
<p>(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,</p>	<p>The project comprises a recreational floodlight development situated within a parkland setting with active recreation facilities (pitches) for several sports. There are floodlights in use in park already. Use of the proposed the proposed lighting will be controlled in accordance with the established operation of the park.</p>
<p>(c) the nature of any associated demolition works,</p>	<p>No demolition works are proposed as part of the scheme</p>
<p>(d) the use of natural resources, in particular land, soil, water and biodiversity,</p>	<p>The proposed development does not give rise to any significant impacts on the use of natural resources.</p>
<p>(e) the production of waste,</p>	<p>No significant waste streams will be generated.</p>
<p>(f) pollution and nuisances,</p>	<p>The proposed scheme is likely to have a neutral impact on pollution as light emissions will be strictly controlled in terms of light spill and hours of operation. The construction phase is likely to introduce temporal nuisance to local property owners.</p>
<p>(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, and</p>	<p>The project does not provide for pollutants or construction works that would give rise to environmental risks, and/or disasters in the area.</p>
<p>h) the risks to human health (for example, due to water contamination or air pollution).</p>	<p>The project is unlikely to give rise to risks to human health arising from contamination or pollution. It supports active recreation and is likely to be beneficial to human health. There is no likely impact on sensitive water bodies, rivers or environmental designations.</p>

<p><b>2. Location of proposed development.</b>  <b>The environmental sensitivity of geographical areas likely to be affected by proposed development, having regard in particular to:</b></p>	
<p>a) the existing and approved land use,</p>	<p>The proposed flood lights facilitate an established recreation facility in a park land and is consistent with the existing use.</p>
<p>(b) 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>The project is located within green field in an established park providing recreational facilities for the community.</p> <p>Due to the nature of the proposed scheme the completed works are not expected to result in significant environmental impacts that affect the relative abundance, availability, quality and regenerative capacity of natural resources.</p>
<p>c) the absorption capacity of the natural environment, paying particular attention to the following areas:</p>	
<p>(i) wetlands, riparian areas, river mouths;</p>	<p>There is no interaction from the development with any watercourse. The proposed development is not likely to give rise to significant effects on wetlands, riparian areas, and river mouth.</p>
<p>(ii) coastal zones and the marine environment;</p>	<p>The proposed project is located approximately 2km from the coast. No direct or indirect impacts are considered to arise.</p>
<p>(iii) mountain and forest areas;</p>	<p>Not applicable due to location of scheme</p>
<p>(iv) nature reserves and parks;</p>	<p>The proposed project is not located on or adjoining any nature reserves or parks.</p>
<p>(v) areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive and;</p>	<p>The project is not located within a Natura 2000 site, and is unlikely have any direct impact, or indirect impact on any Natural 2000 site due to the of construction and activity during operation.</p>
<p>(vi) 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;</p>	<p>The project will not have any impact on an area which there has already been a failure to meet the environmental quality standards laid down in legislation of the European Union.</p>
<p>(vii) densely populated areas;</p>	<p>The project is located within an established residential area of Dun Laoghaire Rathdown, which is experiencing population growth. The scheme provides for access of the population to amenity and recreational facilities.</p>
<p>(viii) landscapes and sites of historical, cultural or archaeological significance</p>	<p>It is considered that the proposed project will not have a significant negative impact on landscapes and sites of historical, heritage, cultural or archaeological significance.</p>

The OPR’s Practice Note on EIA Screening considers what are **likely significant effects**. Refer to Box 1 below.

### Box 1: Likely Significant Effects

**1. Are the effects identified likely to occur?**

This refers to the effects that are expected to occur, those that can be reasonably foreseen as normal consequences of project construction and operation, including where relevant associated demolition, remediation and/or restoration.

**2. Are the effects, which are likely to occur, significant?**

EPA draft guidelines define a ‘*significant effect*’ as an effect, which, by its character, magnitude, duration or intensity alters a sensitive aspect of the environment. The same draft guidelines provide useful definitions in relation to quality of effects, significance of effects, context of effects, probability of effects and duration and frequency of effects.

**3. Will identified likely significant effects impact the environment?**

Likely significant effects should cover the direct and indirect, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the project.

The factors of the environment to be described and assessed are:

- **population and human health;**
- **biodiversity, with particular attention to protected species and habitats;**
- **land, soil, water, air and climate;**
- **material assets, cultural heritage and the landscape; and**
- **the interaction between the factors.**

The following table summarises the likelihood of effects on the environmental factors listed in Box 1.

## Screening Considerations

Aspect	Phase	Potential Effect	Extent	Probability	Significance of Effect	Quality of Effect	Duration
Landscape	C	Perceived negative changes due construction works for the floodlights	Local	Likely	Slight	Negative	Short term/Temporary
	O	Changes in landscape arising from introduction of floodlighting columns and floodlight use	Local	Likely	Moderate	Neutral	Permanent
Visual	C	Perceived changes due to works to provide for development	Local	Likely	Slight	Negative	Short Term/Temporary
	O	Changes to visual appearance of track with addition of lighting structures	Local	Likely	Moderate	Neutral	Permanent
Biodiversity	C	Pollution and disturbance of site (subject to Mitigation Measures)	Local	Likely	Slight	Neutral	Short Term/Temporary
	O	Impact on local habitats through more intense use of lands	Local	Likely	Moderate	Neutral	Permanent
Land & Soil	C	Site preparation works. Potential contamination due to accidental spillage.	Local	Not likely	Slight	Neutral	Temporary
	O	Continued use of track	Local	Likely	Slight	Neutral	Permanent
Human Health	C	Local disturbance from construction activity	Local	Likely	Slight	Negative	Short Term/Temporary
	O	Potential impact on residential amenity from light spillage and noise from intensive use	Local	Not Likely	Moderate	Neutral	Permanent
Water	C	Accidental pollution events occurring in construction if mitigation measures not applied	Local	Not Likely	Moderate	Neutral	Brief - Temporary
	O	None Predicted	Local	Not likely	Moderate	Neutral	Permanent

Air Quality & Climate	C	Reduction of air quality as a result of construction traffic and HGVs, and emissions from construction and plant machinery	Local	Not Likely	Moderate	Neutral	Brief Temporary
	O	Improved air quality due to the promotion of recreation activity	Local	Likely	Moderate	Positive	Long-term
Noise	C	Increase in noise as a result of construction activity, and operation of plant and machinery	Local	Likely	Slight	Negative	Brief - Temporary
	O	Potential noise from intensified use of track & pitch	Local	Not Likely	Moderate	Neutral	Permanent
Cultural Heritage: Built Heritage	C	None predicted.	-	-	-	-	-
	O	None predicted	-	-	-	-	-
Cultural Heritage: Archaeology	C	None predicted	-	-	-	-	-
	O	None predicted	-	-	-	-	-

<p><b>3. Characteristics of potential impacts</b> 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>	
<p>a) the magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected)</p>	<p>The project is constrained in its extent to the existing track within Kilbogget Park</p>
<p>(b) the nature of the impact</p>	<p>In general, construction work for the project will be undertaken on open spaces (recreational grassland).</p> <p>The project provides for the long-term development of recreational flood lights for an existing facility,</p> <p>Works will be relatively constrained with the project not affecting lands outside the site.</p>
<p>c) the transboundary nature of the impact</p>	<p>Not applicable due to scale and location of scheme.</p>
<p>(d) the intensity and complexity of the impact,</p>	<p>Construction impacts will be temporary and of typically low intensity. The construction methodology adopted will ensure potential impacts are mitigated.</p>
<p>(e) the probability of the impact,</p>	<p>The project’s design is subject to refinement and decisions on the design of various details. The impacts of the project during construction and operation phase are comprehended as probable, as the project is set to be developed within an existing parkland around an existing track facility.</p>
<p>(f) the expected onset, duration, frequency and reversibility of the</p>	<p>Temporary environmental impacts are likely to occur. These are not likely to be significant, within the meaning of the Directive.</p>
<p>(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</p>	<p>The proposed development shall be implemented independent of any other development project. It is noted the scheme has potential to provide additional lighting within the park, but the light spill will be contained, and not impact beyond the subject site, and as such this does not give rise to cumulative environmental impacts.</p>

Assessment Directive by or under any other enactment, and	
(h) the possibility of effectively reducing the impact	It is likely that the operation of the scheme will be neutral to positive. There is potential to reduce the impact of the project at construction stage with a detailed construction management plan.

## 6.2 Available results under other relevant EU environmental legislation,

All list of the references/data used in the preparation of the AA Screening report prepared by Flynn Furney.

Other relevant EU environmental legislation may include:

- SEA Directive [2001/42/EC]
- Birds and Habitats Directives [79/409/EEC, 2009/147/EC & 92/43/EEC]
- Water Framework Directive [2000/60/EC]
- Marine Strategy Framework Directive
- Ambient Air Quality Directive and Heavy Metals in the Ambient Air Directive
- Industrial Emissions Directive
- Seveso Directive
- Trans-European Networks in Transport, Energy and Telecommunication
- EU Floods Directive 2007/60/EC

**Table 6: Other Relevant EU Environmental Legislation**

Directive	Results
SEA Directive [2001/42/EC]	The proposed development is located on lands which are within the area of the DunLaoghaire Rathdown Development Plan 2022-2028 which has been subject to Strategic Environmental Assessment.
Birds and Habitats Directives [79/409/EEC, 2009/147/EC & 92/43/EEC]	The AA Screening Report assessment concludes that No impacts are likely as a result of the proposed works on the conservation objectives or overall integrity of the Natura 2000 site due to the scale, nature of and distance from the works area, and the lack of any pathways for indirect impact on any European site.
Water Framework Directive [2000/60/EC]	There will be no negative impact on the status of the water body
Marine Strategy Framework Directive	The site is located inland, away from the coast, there is no likely impact on the coastal area.

Directive	Results
Ambient Air Quality Directive and Heavy Metals in the Ambient Air Directive	n/a to proposed development
Industrial Emissions Directive	n/a to proposed development
Seveso Directive	There are no Seveso sites within the site nor in the vicinity of the subject site
Trans-European Networks in Transport, Energy and Telecommunication	n/a to proposed development
EU Floods Directive 2007/60/EC	The proposed project is not situated within a Flood Risk Zone. There have been no single flood events on or surrounding the proposed scheme.

### 6.3 Conclusions

Having regard to the nature and scale of the proposed development which is below the thresholds set out in Class 10 of Part 2 of Schedule 5, the criteria in Schedule 7, the information provided in accordance with Schedule 7A of the Planning and Development Regulations 2001, as amended, and the following:

- The scale, nature and location of the proposed impacts
- The potential impacts and proposed mitigation measures
- The results of the any other relevant assessments of the effects on the environment

**It is considered that the proposed development would not be likely to have significant effects on the environment and it is recommended that environmental impact assessment report is not required.**







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