
**STATEMENT IN ACCORDANCE WITH
ARTICLE 299B (1)(b)(ii)(II)(C) OF THE
PLANNING AND DEVELOPMENT
REGULATIONS 2001 – 2021**

Project Proposed Strategic Housing Development,
Harold's Bridge Court, Harold's Cross Road
and Greenmount Lane, Dublin 6W

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

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1.0 INTRODUCTION

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

This statement is part of the information provided by the Applicant so that the Board may complete an examination for the purposes of a screening determination in accordance with Articles 299B and 299C of the Planning Regulations. This statement will identify the relevant European Union legislation, and assessments of the effects on the environment carried out, which have informed the proposed development. These relevant assessments will be identified as they relate to the proposed development, the results of those assessments will be outlined, and how those results have been taken into account in determining the significance of the proposed development on the environment will be identified.

The proposed development is a sub-threshold development. The application is not accompanied by an Environmental Impact Assessment (EIA) Report. An EIA Screening Report has been prepared which includes the information specified in Schedule 7A to the Planning and Development Regulations as well as relevant information on the characteristics of the proposed development and its likely significant effects on the environment, which will enable the Board to carry out a screening determination.

The Proposed Development as described in the public notices consist of:

The Adroit Company Ltd. intends to apply to An Bord Pleanála for permission for a strategic housing development on lands at 'Harold's Bridge Court', Harold's Cross Road & Greenmount Lane, Harold's Cross, Dublin 6W. The site is bounded to the north by the rear of existing residential and commercial development along Parnell Road, and by commercial development i.e. "Greenmount Office Park" and residential development i.e. "Boyne Court" to the south. The site is bounded to the east by Harold's Cross Road, to the west by Greenmount Lane and by Limekiln Lane to the south-west.

The proposed development provides for 194 no. dwellings comprised of studio, 1, 2 & 3 bed apartment units in 4 no. 4-9 storey blocks (Blocks A-D). The development also includes 1 no. commercial / retail unit (c.175m²) at ground floor level of Block A, 1 no. creche (142.2m²) at ground floor level of Block C and 22 no. work studios (1,980m²) at ground & 1st floor level of Block D, all on a site area of 1.01 ha.

Permission is sought for the demolition of all existing buildings on site (c. 5,356m²), i.e. (a) 4 no. 3 storey duplex residential buildings (i.e. 48 no. dwellings, c. 3,542m²) and 2 no. 1 storey residential buildings (c. 40m² & 41m²) all within Harold's' Bridge Court, (b) 3 no. 2 storey houses at Clare Villas (c. 331m²) and (c) an existing warehouse (c. 1,248m²) and ancillary structures (c.154m²) fronting onto Greenmount Lane.

Vehicular access to the proposed development will be via Harold's Cross Road, utilizing the existing entrance. Vehicular traffic only associated with Block D will be allowed enter the site from Greenmount Lane with no vehicular through traffic progressing further through the development. Pedestrian and cyclist access is proposed via Greenmount Lane and Harold's Cross Road.

The proposed development consists of the following:

- Block A is a four to seven storey building accommodating 56 no. dwellings comprised of 29 no. 1 bed & 27 no. 2 bed apartments. Block A also includes 1 no. commercial / retail unit (c.175m²) at ground floor level, with a communal amenity room (c.35m²) and 2 no. communal roof gardens (c.144m² & c.39m² respectively) on the 6th floor. Bin and bicycle stores, sub-station & switch room are accommodated at ground floor.
- Block B is a four to nine storey building accommodating 56 no. dwellings comprised of 2 no. studio units, 20 no. 1 bed, 32 no. 2 bed & 2 no. 3 bed apartments. Block B also includes a communal amenity room (c.53m²) on the 3rd floor, with a communal roof garden (c.164m²) also on the 3rd floor. Bin and bicycle stores are accommodated at ground floor.
- Block C is a four to eight storey building accommodating 57 no. dwellings comprised of 15 no. 1 bed, 39 no. 2 bed & 3 no. 3 bed apartments. Block C also includes a 1 storey creche (142.2m²) at ground floor level, with associated outdoor play space (c.233m²), bin stores at ground floor level and a communal amenity room (c.50m²) on the 7th floor, with a communal roof garden (c.169m²) also on the 7th floor.
- Block D is a four to five storey building accommodating 25 no. dwellings comprised of 1 no. studio unit, 16 no. 1 bed, 7 no. 2 bed & 1 no. 3 bed apartments. Block D also includes 22 no. work studios (totalling 1,980m²) at ground & 1st floor level, and communal open space (c.124m²) at 2nd floor level. Bin and bicycle stores are accommodated at ground floor.

- *The proposed development provides for public open space (1,355m²), hard and soft landscaping & boundary treatments. Communal residential amenity areas and open spaces are provided for in the form of communal roof gardens and communal rooms associated with the individual blocks. Additional communal open space is provided at ground level totalling 499m². Private open spaces are provided as terraces at ground floor level of each block and balconies at all upper levels.*
- *Car parking is to be provided in the form of surface and basement level car parking. Blocks B & C are located above the proposed basement, which accommodates 58 no. car parking spaces, 4 no. motorcycle spaces and 426 no. bicycle parking spaces (inclusive of 8 no. cargo bike spaces & 48 no. electric bicycle spaces). There are an additional 7 no. surface level car parking spaces proposed (including 4 no. club car spaces), and 50 no. surface bicycle parking spaces. Bicycle parking is also accommodated within each of the 4 no. blocks at ground floor level (104 no. spaces in total).*
- *The proposed development includes for all associated site development works above and below ground, bin & bicycle stores, plant (M&E), 2 no. sub-stations, public lighting, servicing, signage, surface water attenuation facilities etc.*

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

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

The requirements of the objectives of the Habitats Directive and the Birds Directive have been for the proposed development have been taken into account through the following assessments / reports:

- Appropriate Assessment (AA) Screening Report Scott Cawley (2022a)
- Ecological Impact Assessment (EclA) Scott Cawley (2022b)

2.1 RELEVANT ASSESSMENTS

Appropriate Assessment (AA) Screening Report

An Appropriate Assessment (AA) Screening Report has been undertaken for the proposed development by Scott Cawley (2022a) pursuant to the requirements of the Habitats Directive. The AA Screening stage examines the likely significant effects of the proposed works, either on its own, or in combination with other plans and projects, upon a European site and considers whether, on the basis of objective scientific evidence, it can be concluded, in view of best scientific knowledge and the conservation objectives of the relevant European sites, that there are not likely to be significant effects on any European site. This report is included with the planning documentation. The AA Screening undertaken concludes:

Following an examination, analysis and evaluation of all relevant information and in view of the best scientific knowledge, and applying the precautionary

principle, it can be concluded that the possibility of any significant effects on any European sites... whether arising from the project alone or in combination with other plans and projects, can be excluded... In reaching this conclusion, the nature of the project and its potential relationship with all European sites within the zone of influence, and their conservation objectives, have been fully considered.

The conclusions of the AA Screening Report have been adopted within the EIA Screening Report (AWN 2022) (Sections 3.4 and Section 5.3) when considering the ecological sensitivity of the site and determining the likelihood of significant effects on the environment arising from the proposed development with particular attention to potential impacts on European Sites.

Ecological Impact Assessment

An Ecological Impact Assessment (EclA) has been undertaken for the proposed development by Scott Cawley (2022b) and is included with the planning documentation.

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

The EclA considers that *'The proposed development does not have the potential to result in significant negative effects on nationally designated areas for nature conservation, whether considered on its own or in combination with any other plans or projects. The proposed development has no potential to affect the surface water quality or the ecology of the adjacent waterbodies as the surface water discharge from the site will be zero' and 'The proposed development does not have the potential to affect habitats indirectly as a result of Third schedule non-native invasive species impacts due to lack of Third schedule non-native invasive species within the site. The proposed development does not have the potential to result in significant negative effects on fauna at a local or any other geographic level. A range of mitigation measures have been proposed, in addition to the extensive and stringent environmental control measures that have been incorporated into the design of the proposed development. All of the mitigation measures shall be implemented in full and are best practice, tried and tested, and effective control measures to protect biodiversity and the receiving environment'.*

All Irish bat species are protected under the Wildlife Act (1976) and Wildlife Amendment Acts (2000 and 2010). Furthermore, the Habitats Directive, seeks to protect rare species, including bats, and their habitats and requires that appropriate monitoring of populations be undertaken.

Specialist bat surveys have been undertaken for the proposed development by Scott Cawley. These surveys included a ground-level assessment of all trees and structures within the site, internal and external assessment of structures and detector survey. No signs of bats were noted from internal and/or external inspections of the existing buildings on site, and the buildings on-site are considered to be of low suitability for roosting bats. Three species of bat were recorded within the site during the surveys undertaken in 2020, and three species were recorded within the site during the surveys undertaken in 2022.

The EclA (Scott Cawley 2022b) noted that *'No signs of bats were noted from internal and/or external inspections of the residential buildings and warehouse within the lands. In light of the scale, age and materials of construction... the buildings within the lands are considered to be of low suitability for roosting bats. Furthermore, no bats were observed exiting from or returning to any of the buildings within the lands during pre-dawn presence/absence surveys'*. Overall, the survey area is considered to be of low importance for roosting bats, therefore no significant negative impacts expected to result from the proposed development.

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

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

The Water Framework Directive (WFD) (Directive 2000/60/EC) requires all Member States to protect and improve water quality in all waters.

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

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

3.1 RELEVANT ASSESSMENTS

The AA Screening Report (Scott Cawley 2022a) and Hydrological & Hydrogeological Qualitative Risk Assessment (AWN 2022) have been informed by the water quality status as defined by the monitoring program and assessment undertaken by the EPA pursuant to the obligations to the WFD. The results of the monitoring program and assessment undertaken by the EPA are summarised below:

The proposed development site lies within the Liffey and Dublin Bay Catchment (Hydrometric Area 09) and River Dodder sub-catchment (WFD name: Dodder_SC_010, Id 09_16) (EPA, 2022).

The Environmental Protection Agency (EPA, 2022) on-line mapping presents the available water quality status information for water bodies in Ireland. The River Poddle belongs to the Poddle_010 WFD surface waterbody which has a 'Poor' Status (EPA, 2022) and its WFD risk score is 'At risk of not achieving good status'. It should be noted that, although the Poddle River is an ungauged and culverted catchment with no historical monitoring data from the EPA, its status was estimated by an expert technical opinion, which, according to the EPA, has "low confidence" (refer to www.catchments.ie).

The Coastal Waterbody Dublin Bay has a WFD status (2013 – 2018) of 'Good' and a WFD risk score of 'Not at risk'. The ecological status (which comprises biological and chemical status) of transitional and coastal water bodies during

2013-2018 for Dublin Bay is classed as 'Good'. The most recent surface water quality data for the Dublin Bay on trophic status of estuarine and coastal waters indicate that they are 'Unpolluted' (based on Water Quality in 2020, EPA, 2021). Under the 2015 'Trophic Status Assessment Scheme' classification of the EPA, 'Unpolluted' means there have been no breaches of the EPA's threshold values for nutrient enrichment, accelerated plant growth, or disturbance of the level of dissolved oxygen normally present.

The results of the monitoring program and assessment by the EPA have been used to determine the current water body status of the aquifer and receiving waters for any discharge from the proposed development site. The current water body status has been considered within the EIA Screening (Section 4.2).

Surface water from the proposed development site shall discharge to an existing 600mm combined sewer which traverses the site and enters from the Harold's Cross Road. This in turn discharges to an existing 3,660mm trunk sewer located in Parnell Road and runs parallel to the Grand Canal. This 3,660mm trunk main eventually discharges to the Ringsend WWTP. The Hydrological and Hydrogeological Qualitative Risk Assessment prepared by AWN notes that *'As the Proposed Development will have no additional stormwater run-off, when compared with the current situation, during a stormwater event, the development will, therefore, have no measurable impact on the water quality in any overflow situation at Ringsend WWTP apart from a minor contribution from foul sewage'*.

The current water body status has been considered in the examination of the likelihood of significant effects on water quality in the Liffey and Dublin Bay Catchment and the River Dodder sub-catchment having regard to potential direct and indirect impacts from surface water and foul water arising from the proposed development during the construction and operational phases.

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

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

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

4.1 RELEVANT ASSESSMENTS

Dublin City Council (DCC) as part of the preparation of the Dublin City Development Plan 2016-2022 and Draft Dublin City Development Plan 2022-2028 undertook a Strategic Flood Risk Assessment (FRA), which assessed the flood risk indicators in relation to land use proposals pursuant to the Floods Directive.

In addition to the DCC Strategic FRA, available flooding information also includes the Office of Public Works (OPW) Eastern Catchment Flood Risk Assessment and Management (CFRAM) Study, and the Irish Coastal Protection Strategy Study (ICPSS), and the Flood Maps on floodinfo.ie. The Eastern CFRAM Tidal, Fluvial, and Pluvial studies was commissioned in order to meet the requirements of the Floods Directive, as well as to deliver on core components of the 2004 National Flood Policy,

in the Eastern district. The ICPSS is a national study that was commissioned in 2003 with the objective of providing information to support decision making about how best to manage risks associated with coastal flooding and coastal erosion. The Flood Maps (on floodinfo.ie) have been developed to comply with the requirements of the European Communities (Assessment and Management of Flood Risks) Regulations 2010 to 2015 (implementing Directive 2007/60/EC) for the purposes of establishing a framework for the assessment and management of flood risks, aiming at the reduction of adverse consequences for human health, the environment, cultural heritage and economic activity associated with floods.

The Strategic FRA and ICPSS study identified that the subject lands are located inside the 1,000-year flood zones identified and therefore the site is within Flood Zone B as defined by The Planning System & Flood Risk Management – Guidelines for Planning Authorities and indicated by the Irish Coastal Protection Strategy Study and Dublin City County Strategic FRA.

A site-specific Flood Risk Assessment (FRA) has been prepared by DBFL (2022a). This Site-Specific FRA draws on, and is informed by studies undertaken pursuant to the requirements of the Floods Directive, including:

- Dublin City Council Development Plan 2022-2028 (including Strategic Flood Risk Assessment)
- The Planning System and Flood Risk Management Guidelines (OPW, 2009)
- Office of Public Works Flood Maps
- Local Authority Drainage Records

The Site-Specific FRA determined that the vast majority of the site is within Flood Zone B, and therefore a justification test was required under The Planning System and Flood Risk Management Guidelines (OPW 2009).

The FRA concluded that *'The development passes the Justification Test in accordance with Box 5.1 of the Guidelines and the proposed development is deemed appropriate to be located within Flood Zone B on the basis that the mitigation measures stipulated within justification are met. It is also noted that this location also passed the justification test in DCC's SFRA (2016-2022 and 2022-2028).'*

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

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

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

The Chemicals Act (Control of Major Accident Hazards involving Dangerous Substances) Regulations 2015 (S.I. No. 209 of 2015) (the "COMAH Regulations"), implements the latest Seveso III Directive (2012/18/EU).

5.1 RELEVANT ASSESSMENTS

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

The proposed development is not within the consultation distance of any Seveso Site, nor is the proposed development a Seveso/COMAH facility. The closest Seveso site to the proposed development is the Iarnród Éireann Maintenance Works site, a Lower Tier establishment located c. 3.60 km north west of the development site at Inchicore Works, Inchicore, Dublin 8.

There are no specific assessments required by the Applicant under the Seveso Directive or COMAH Regulations.

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

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

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

In Ireland there is only one monitoring site that has exceedance of the EU Air Quality limit value for nitrogen dioxide, this is located at St. John's Road West station Dublin. An annual average concentration of 43 µg/m³ was measured in 2019. This is above the EU annual limit value for NO₂ of 40 µg/m³. There have been no exceedances recorded at any monitoring stations subsequently during 2020 or 2021. This exceedance of an air pollution standard is as a result of the heavy traffic passing this monitoring station. In response to this the Dublin Region Air Quality Plan (2021) has been developed by the Dublin Local Authorities in conjunction with the EPA.

6.1 RELEVANT ASSESSMENTS

The Dublin Region Air Quality Plan (2021) sets out 14 measures and actions to be established by Dublin Authorities and the Minister for Environment. The proposed development is not located within an area which has an identified exceedance in the EU air quality limits; there are no specific assessments under the CAFE Directive relevant to the proposed development at this location.

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

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

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

7.1 RELEVANT ASSESSMENTS

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

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

The CEMP (DBFL) has been prepared to demonstrate how it is proposed during the construction phase to comply with the following relevant legislation and guidelines including:

- Waste Management Act 1996 (as amended)
- Department of Environment, Heritage and Local Government, Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects (2006)

The management measures set out in Section 10 of the CEMP have been adopted within the EIA Screening Report (Section 5.10) in the examination of the likelihood of significant effects on the environment arising from the proposed development in respect of material assets and waste.

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

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

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

8.1 RELEVANT ASSESSMENTS

Dublin City Council as part of the Dublin City Development Plan (2016-2022) and Draft Dublin City Development Plan (2022-2028) undertook a Strategic Environmental

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

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

Figure 8.1 Dublin CDP SEA Statement Potential Residual Effects

The residual effects of particular relevance to the proposed development are those that relate to Water Quality, in respect of the limitations at Ringsend, and flooding in respect of the increase in areas of hardstanding. The potential residual effects in respect of Water Quality, and Flooding that have been identified in the SEA have informed the Ecological Impact Assessment (Scott Cawley 2022b), Appropriate Assessment Screening Report (Scott Cawley 2022a) and the Site-Specific Flood Risk Assessment (DBFL 2022a) for the proposed development.

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

9.0 DIRECTIVE 2008/56/EC; MARINE STRATEGY DIRECTIVE

The Marine Strategy Directive (2008/56/EC) was adopted on 17 June 2008 and establishes a framework for community action in the field of marine environmental policy. This has been subsequently amended by Directive (2017/845/EC) as regards the indicative lists of elements to be taken into account for the preparation of marine strategies. The Marine Strategy Directive (2008/56/EC) was transposed into national legislation by the European Communities (Marine Strategy Framework) Regulations 2011 (S.I. 249 2011).

As a residential development set well back from any coastal area, the Marine Strategy Directive is not directly relevant to the proposed development. Any impact on nearby water bodies has been assessed as part of the EIA Screening Report and AA Screening Report and factored into the project design.

The EIA Screening Report notes that the *'proposed development due to its size and localised nature will not have any significant negative effect on wetlands, riparian areas, river mouths, coastal zones and the marine environment, mountain and forest areas, nature reserves and parks, or densely populated areas'*.

10.0 CONCLUSION

This statement indicates how the available results of 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 in this proposed project.

This statement identifies the relevant Directives which could apply the proposed project. The relevant assessments have been identified as they relate to the proposed development, the results of those assessments, and how those results have been taken into account in determining the significance of the proposed development on the environment.

This statement should be read in conjunction with the Environmental Impact Assessment Screening document prepared by AWN Consulting and enclosed with the application.

ABP may complete an examination for the purposes of a screening determination in accordance with Article 299B of the Planning Regulations and, in particular, may have regard to the matters prescribed at Article 299B(1)(b) of the Planning Regulations.

This statement, in particular, is provided so that ABP may have regard to "*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*" in accordance with Article 299B (1)(b)(ii)(II)(C) of the Planning Regulations.

This statement supports the conclusion in the EIA Screening document prepared by AWN Consulting that the proposed development is not likely to have any significant impacts on the environment and, therefore, that no EIA is required in respect of the proposed sub-threshold development.

11.0 REFERENCES

Hydrological and Hydrogeological Qualitative Risk Assessment for a Proposed SHD Development on Lands at Harold's Bridge Court, Harold's Cross, Dublin 6W, Co. Dublin. AWN Consulting Ltd. 2022.

Site Specific Flood Risk Assessment, Harold's Bridge Court SHD. DBFL Consulting Engineers 2022a.

Construction & Environmental Management Plan, Harold's Bridge Court SHD. DBFL Consulting Engineers 2022b.

Appropriate Assessment Screening Report, Harold's Bridge Court Strategic Housing Development. Scott Cawley 2022a.

Ecological Impact Assessment, Harold's Bridge Court Strategic Housing Development. Scott Cawley 2022b.