

AtkinsRéalis



# Construction Environmental Management Plan

Shankill Property Investments Limited

July 2025

0118265DG0003

# SEA GARDENS PHASE 1 BLOCK A

# Notice

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# 1. Introduction

## 1.1 Overview

AtkinsRéalis has been commissioned by Shankill Property Investments Ltd (part of the Ballymore Group) to prepare a Construction Environmental Management Plan (CEMP) for the Sea Gardens Phase 1 Block A (“the proposed development”) (see Figure 1-1). The proposed development comprises of a residential development on a site at the former Bray Golf Club Lands off the Dublin Road, Bray, Co. Dublin. The development will complete Phase 1 of the wider Sea Gardens development – the first part of which (Shoreside Park as permitted under ABP-311181-21) is nearing completion and occupation (Figure 1-2). The ca. 1.38 hectare site is generally bounded to the north by existing public open space at Corke Abbey Valley Park, to the east by the Irish Rail Dublin-Wexford/ Rosslare main rail line, to the south by undeveloped lands and to the west by Shoreside Park. See Figure 1-3 showing an aerial image of the proposed development’s location.

The proposed development will consist of the provision of 159 no. residential units over/around a shared 2-level podium comprising of: 9 no. 4-bedroom, 3 and 4-storey terraced houses with associated private gardens / terraces; and 150 no. apartments in 2 no. blocks ranging in height from 6 to 10-storeys (Block A1) and 7 to 11-storeys (Block A2) and consisting of a total of 48 no. 1-bedroom units, 58 no. 2-bedroom units, 44 no. 3-bedroom units, all with private balconies or terraces. The blocks will also include communal lounge areas; a communal gym in Block A1; refuse storage areas; and associated plant. The shared 2-level podium will include car, motorcycle and bicycle parking, with additional car parking provided within the curtilage of 5 no. of the proposed townhouses. The proposed development will also include: public open space including play areas; communal open space within the central podium courtyard; pedestrian / cycle linkages with adjoining existing and permitted developments; associated connections to the surrounding road network; all associated landscaping and public lighting; an ESB substation; drainage arrangements; utility connections; and all site development works. A detailed development description is set out in the Planning Report prepared by RPS and enclosed as part of the LRD application package.



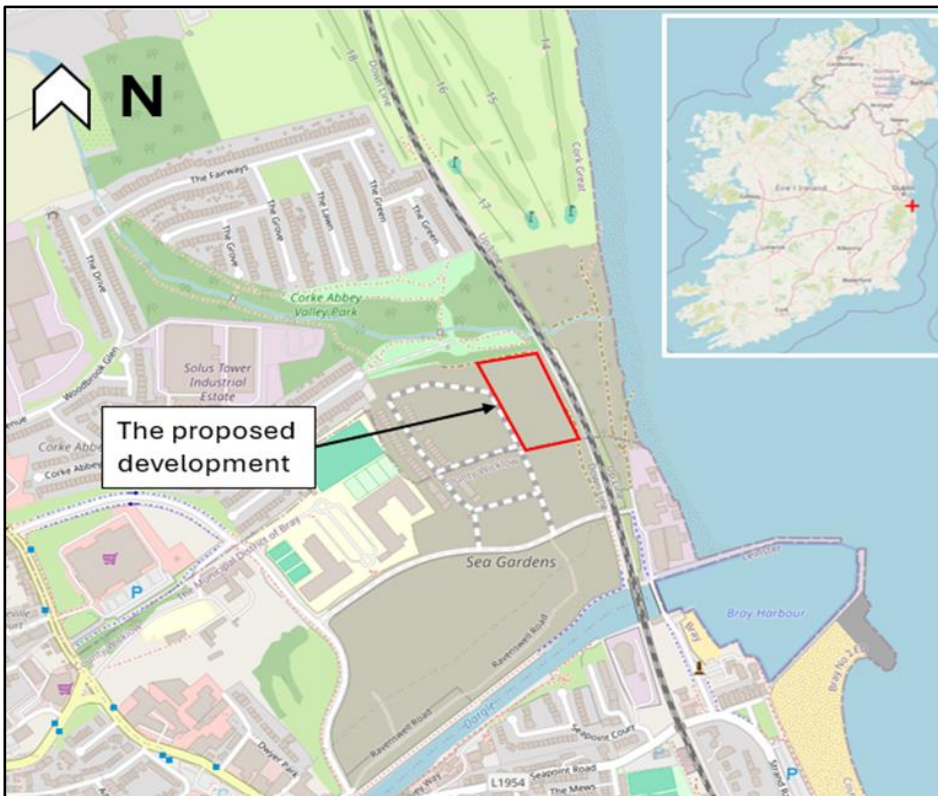


Figure 1-1 - Location of the proposed development (EPA, 2025)



Figure 1-2 - Proposed Development within Sea Gardens Masterplan Context



**Figure 1-3 - Aerial Imagery of the proposed development (Google Maps, 2025)**

The principle objective of this Construction Environmental Management Plan (CEMP) is to provide recommended measures to avoid, minimise and control adverse environmental impacts associated with the construction of the proposed Sea Gardens Phase 1 Block A development, at the planning stage of this project.

## 1.2 Purpose of CEMP

The purpose of this CEMP is to provide recommended measures to avoid, minimise and control adverse environmental impacts associated with the construction of the proposed development. The CEMP will document the commitment to safeguarding the environment through the identification, avoidance and mitigation of the potential negative environmental impacts which are associated with the proposed development.

The Contractor will undertake the works in accordance with the provisions of the CEMP. This may be further added to, to address other detailed construction matters. The CEMP will be updated by the Contractor to address any subsequent planning conditions relevant to the proposed development.

The CEMP aims to define good practice as well as specific actions required to implement mitigation requirements as identified in the following;

Note all of the key following documents (non-exhaustive list) are included within the Sea Gardens Phase 1 Block A planning submission to Dún Laoghaire-Rathdown County Council;

- Architectural Design Statement (Howells, 2025)
- Sea Gardens Masterplan Design Document (Howells, 2025)
- Engineering Planning Report (AtkinsRéalis, 2025)
- Flood Risk Assessment (AtkinsRéalis, 2025)
- Stormwater Impact Assessment Report (AtkinsRéalis, 2025)
- Transport Impact Assessment (AtkinsRéalis, 2025)

- Mobility Management Plan (AtkinsRéalis, 2025)
- Landscape Report (BSLA, 2025)
- Landscape and Visual Impact Assessment (Model Works, 2025)
- Daylight & Sunlight Report (3DDB, 2025)
- JCA Archaeological commentary Letter 09/06/2025 (John Cronin, 2025)
- Ecological Impact Report (AtkinsRéalis, 2025)
- Inward Noise Assessment (AWN, 2025)
- Site Lighting Report (Metec, 2025)
- Utilities Report (Metec, 2025)
- Outline Construction Management Plan (AtkinsRéalis, 2025)
- Construction Resource Waste Management Plan (AtkinsRéalis, 2025)
- Outline Operational Waste Management Plan (AtkinsRéalis, 2025)
- EIA Screening Report (AtkinsRéalis, 2025)
- Appropriate Assessment Screening Report (AtkinsRéalis, 2025)
- Planning Report (RPS, 2025)

## 1.3 Structure

This CEMP has been structured as follows:

- **Section 1** outlines the purpose of the CEMP and introduces the proposed development/project;
- **Section 2** describes in detail the proposed development/project;
- **Section 3** outlines the minimum standards, legislation and guidance required of the Contractor during the development of the CEMP;
- **Section 4** identifies the relevant roles and responsibilities for developing, implementing, maintaining and monitoring environmental management;
- **Section 5** sets out the mechanisms through which environmental requirements would be managed;
- **Section 6** sets out the general requirements to of the CEMP;
- **Section 7** provides a summary of minimum requirements that should be implemented by the Contractor; and
- **Section 8** sets out the procedures for the Emergency Response Plan.



## 2. The Proposed Development

### 2.1 Site Location & Surrounding Land use

The 1.38ha proposed development site is located on site of the former Bray Golf Club Lands off the Dublin Road, Bray, Co. Dublin. The development will complete Phase 1 of the wider Sea Gardens development – the first part of which (Shoreside Park as permitted under ABP-311181-21) is nearing completion and occupation. The site is generally bounded to the north by existing public open space at Corke Abbey Valley Park, to the east by the Irish Rail Dublin-Wexford/ Rosslare main rail line, to the south by undeveloped lands and to the west by Shoreside Park. The proposed development Layout Plan can be seen below in Figure 2-1.



Figure 2-1 - Proposed Site Layout Plan (Howells, 2025)

### 2.2 Existing Site Setting

The Site is within Dún Laoghaire-Rathdown County Council (DLRCC) bounds.

The proposed development lands are located within a former golf course, Bray Golf Club, first established in the late nineteenth century and characterised by open ground covered by short grass with mature trees and scrub in places. The subject infill site contains remnants of its former use as a golf course and is primarily covered in grass and mixed vegetation. The subject site is located within the northeast portion of the overall Sea Gardens site. The topography of the site is generally flat with the only exceptions being a small decrease in elevation toward the southern end of the site and a small ridge rising toward the eastern boundary. The lands include an archaeological site comprising of a linear earthwork which runs along the county boundary line. This feature presents itself along a low bank and is recorded as a “possible linear earthwork” in the County Dublin edition of the Record of Monuments and Places (RMP no. 026-124). A number of archaeological investigations of this earthwork have been undertaken as part of previous planning applications in the area<sup>1</sup>. These investigations concluded that the earthwork comprises of an 18th / 19th century landscape feature, and is not a section of the ‘Pale’ ditch as had been previously postulated by Archaeological Survey of Ireland (John Cronin & Associates, 2025).

To the north of the subject site is the Corke Abbey Valley Park through which Rathmichael Stream flows in an easterly direction through wooded and grassland areas which have formalised public pathways throughout. There is a belt of woodland planting along the northern boundary which provides a strong landscape backdrop. The Dublin to Rosslare railway line runs along the eastern boundary of the subject site, with a coastal strip and the Irish sea located beyond this. To the south, the site is bound by the administrative boundary between DLRCC and WCC, with undeveloped lands located beyond this (future location of Sea Gardens - Block B). To the west, is Shoreside Park which was permitted under ABP-311181-21. This development is under construction and nearing completion, with several units already occupied. Coláiste Ráithín and Ravenswell Primary School are located further to the west of this new development. The site is accessed from the Dublin Road (R761 Regional Road) via the Northern Access Road which forms the eastern and northern boundaries of Lidl (former Industrial Yarns site), and the Southern Access Road which facilitates access from Castle Street via the Ravenswell Road. These main access roads lead to a network of new internal streets permitted under ABP-311181-21 (Shoreside Park – formerly referred to as Coastal Quarter SHD).

## 2.3 Proposed Development

The proposed development will consist of the provision of 159 no. residential units over/around a shared 2-level podium comprising of: 9 no. 4-bedroom, 3 and 4-storey terraced houses with associated private gardens / terraces; and 150 no. apartments in 2 no. blocks ranging in height from 6 to 10-storeys (Block A1) and 7 to 11-storeys (Block A2) and consisting of a total of 48 no. 1-bedroom units, 58 no. 2-bedroom units, 44 no. 3-bedroom units, all with private balconies or terraces. The blocks will also include communal lounge areas; a communal gym in Block A1; refuse storage areas; and associated plant. The shared 2-level podium will include car, motorcycle and bicycle parking, with additional car parking provided within the curtilage of 5 no. of the proposed townhouses. The proposed development will also include: public open space including play areas; communal open space within the central podium courtyard; pedestrian / cycle linkages with adjoining existing and permitted developments; associated connections to the surrounding road network; all associated landscaping and public lighting; an ESB substation; drainage arrangements; utility connections; and all site development works.

A full development description is set out in the Planning Report prepared by RPS (2025). Various types of finishes and facades are proposed for the buildings within the development site which are detailed in the Architectural Design Statement (Howells, 2025) accompanying this planning submission.

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<sup>1</sup> These investigations are detailed in the Cultural Heritage Chapter prepared by John Cronin and Associates in the Environmental Impact Assessment Report (EIAR) submitted as part of the planning application under ABP-311181-21. An updated Cultural Heritage Assessment reconfirms this and is submitted as part of the subject LRD planning application.

## 2.4 Key Stages

The proposed development will involve the following key work phases:

- Tender Stage;
- Procurement and appointment of successful Tenderer(s) (hereafter referred to as The Contractor);
- Detailed Design Stage;
- Site preparatory works including the preparation of all required Detailed Safety and Health, and Environmental Management documents;
- Site mobilisation;
- Construction Stage;
- Completion; and,
- Operational Stage.

Plant/machinery expected to be used during construction include heavy excavators, piling rigs, smaller excavators, dumpers, mobile cranes, and a tower crane.

Materials expected to be used during construction include piling mat, Continuous flight auger (CFA) piled foundations with in-situ reinforced concrete structural frame up to and including podium transfer slab, drainage and services, Precast reinforced concrete superstructure, brick external leaf, with Steel Framing System (SFS) metal or concrete wall infill for internal leaf, Scaffolding and Internal party walls will be Reinforced Concrete (RC), other walls SFS metal drylined.

## 2.5 Environmental Considerations

This section summarises the receiving environment along with key environmental factors (at this preliminary juncture) that should be considered during the construction phase.

### 2.5.1 Noise

A review of EPA (2025) Noise Maps indicates the Proposed Development is within the Dublin agglomeration and within the impacted region from the Dublin to Rosslare Railway with noise levels range between Lden 65-74dB and Lnight 55-64dB. The National Road network including the R761 Dublin Road, located ca. 650m from the Proposed Development has Lnight levels ranging between 45-49dB. The site has been classified as having a medium noise risk using guidance contained in ProPG (AWN Consulting, 2025). The Inward Noise Assessment concluded that *'the proposed development site meets the guidance and criteria set out in the NAP, ProPG and BS8233'* and the internal noise levels will be largely 'good' for the development's occupants.

### 2.5.2 Air Quality

Dust arising from excavation and import of soil to the Site, along with vehicle movement as well as emissions from construction vehicles and plant will contribute to reduced air quality. Some activities including infilling of soil, excavation of trenches, stockpiling and movement of materials, and construction vehicle movements may all contribute to generating ambient dust. The air quality within the proposed site is 'good' (EPA, 2025).

### 2.5.3 Soils and Geology

Based on the Teagasc soils database available on the GSI public data viewer, the dominant soil type underlying the Site and surrounding area is 'Made Ground' with areas of 'Beach sand and gravels' located to the east and 'Alluvial' soils are located to the south. According to the GSI public data viewer (GSI, 2025), the quaternary sediments underlying the vicinity of the Site comprise 'Gravels derived from Limestones'. GSI (2025) indicates

that the Bedrock Geology 100k within the vicinity of the proposed project site comprises of the Maulin Formation -Dark blue-grey slate, phyllite & schist.

The regional soil descriptions were verified by the ground investigation. Site specific soils records, for the general masterplan development lands, as observed during the ground investigation (IGSL, 2021) are summarised as follows;

- Topsoil was encountered at most locations across the masterplan lands and ranged from ca. 0.1 to 0.3mbgl.
- Made Ground was encountered at various locations across the masterplan lands to a maximum depth of 2.3mbgl. Made ground beneath the masterplan lands generally comprised reworked soil or gravel fill material; however rare to occasional inclusions of red bricks, wood and plastic were identified at several locations.
- Till encountered across the masterplan lands has been described primarily as firm to very stiff, brown, sandy Silt / Clay with occasional cobbles.
- This is generally underlain by loose to dense grey sandy gravel / gravelly sand, to a maximum depth of 13.8mbgl, beneath which very soft peaty silt / clay was identified within localised areas to a maximum depth of 13.3mbgl. This material was further underlain by gravelly clay and gravel to a maximum depth of 23.8mbgl.

Ground investigation records for the masterplan lands confirm that no visual or olfactory evidence of soil contamination was encountered at any of the exploratory locations across the Site.

There is also a historic landfill located immediately to the east and down gradient of the Site, known as the former Bray Municipal Landfill. This landfill has been the subject of a phased environmental risk assessment process. A site investigation, Tier 2 Environmental Risk Assessment (Fehily Timoney & Co., 2016) and Remediation Option Appraisal (Fehily Timoney & Co., 2017) have been carried out on the historic landfill Site to fully assess the current ground conditions and potential risk that the former landfill could pose to human health and environmental receptors in the vicinity. No unacceptable risk was identified offsite, and remediation works have since been completed at the site. Therefore, the historic landfill does not pose a risk of contamination to the subject site.

As a precautionary measure, the potential risk of encountering ground contamination should be addressed by the Contractor in the CEMP.

## 2.5.4 Ecology

An AA Screening report and an EclA were prepared by AtkinsRéalis (2025) and are included in the Sea Gardens Phase 1 Block A Planning Submission. The purpose of these ecological reports is to identify potential impacts on European sites and examines the likelihood of the proposed development resulting in a significant effect on the features of interest and conservation objectives of European sites.

Multiple site visits and ecological surveys were undertaken within the Site by AtkinsRéalis ecologists Colin Wilson, Daniel Blake, and Kevin Coogan from 2020 to 2025 details of which presented below. Surveys were also undertaken by Dr Tina Aughney (2020 Bat Surveys) and John Morgan of Independent Tree Surveys (2020 & 2024).

### ***Previous Surveys***

Initial ecological surveys were undertaken by senior ecologist Colin Wilson on 27<sup>th</sup> February, 16<sup>th</sup> July and 14<sup>th</sup> August 2020 and 21<sup>st</sup> July 2022. Surveys were undertaken within the Site and also across the wider landscape including the Sea Gardens Phase 2 development site and all the Harbour Point Masterplan lands, Rathmichael Woods to the north of the Site and scrublands to the east of the railway line / east of the Site. During the course of both the winter and summer walkover surveys the Site was evaluated for the presence of and suitability for birds, mammals, amphibians and insect groups such as lepidoptera and hymenoptera. A Phase 1 habitat survey was undertaken during 16<sup>th</sup> July and 14<sup>th</sup> August 2020.

Dr Tina Aughney was commissioned by AtkinsRéalis to undertake bat surveys for the Site in line with published best practice. The Site was surveyed for evidence of bat activity during 12<sup>th</sup> and 15<sup>th</sup> July and 6<sup>th</sup> and 7<sup>th</sup> August



2020. Bat surveys assessed the Site for evidence of roosting, feeding and commuting bats and included Tree Potential Bat Roost (PBR) Surveys, Static Detector Surveys, Dusk and Dawn Bat Surveys, Walking Transects and Building Inspections (old clubhouse buildings now demolished).

## **2023 - 2024 Surveys**

The proposed development site was subject to re-surveying in 2023 and 2024 by AtkinsRéalis ecologists. Site surveys evaluated the importance of the Site to flora and fauna in line with the approach set out in the Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater, Coastal and Marine (CIEEM, 2018, 2024 reissue).

The Site and surrounding lands were resurveyed for evidence of terrestrial mammal activity and mammal refugia (badger setts, fox dens) during the 22<sup>nd</sup> February, 22<sup>nd</sup> April and 24<sup>th</sup> May 2024. The Site was surveyed for evidence of badger, otter, fox, hedgehog, and squirrel activity as these species have been historically recorded within the environs of the Site. Surveys paid particular attention to any evidence of protected mammal species; badger as there is a known and recorded breeding/maternity sett located in lands to the north (c. 1km outside) of the proposed Site. A mammal hole was discovered within the projects redline boundary and a camera trap survey was undertaken between 22<sup>nd</sup> April and 24<sup>th</sup> June 2024.

The Site was visited on 5 no. occasions to undertake bat surveys. Two Bat Emergence Surveys were conducted around two oak trees which had roosting bats noted during 2020 bat surveys. Bat Activity Transect Surveys were also conducted throughout the development site. Bat Emergence Surveys were conducted on 25<sup>th</sup> June 2024 and 17<sup>th</sup> July 2024. Bat Activity Transect Surveys were undertaken 26<sup>th</sup> June 2024, 2<sup>nd</sup> July 2024 and 3<sup>rd</sup> July 2024. Two static detectors were left on site to gain additional bat data between the following dates between the 2<sup>nd</sup> July 2024 and 19<sup>th</sup> July 2024.

An otter survey was undertaken on the 25<sup>th</sup> October 2024. The survey consisted of inspecting both banks of the River Dargle (c. 840m per bank) beginning at the Swan Sanctuary at Harbour Road extending as far as Lower Dargle Road. The area surveyed for field signs of otter such as prints, slides, holts, couches and spraints.

The proposed development site was subject to surveying for the presence of wintering waterbirds on 22<sup>nd</sup> February 2023, 31<sup>st</sup> March 2023, 15<sup>th</sup> September 2023 and 22<sup>nd</sup> February 2024. A further waterbird survey was undertaken within the development site and along the River Dargle to ascertain if the Mute Swan (*Cygnus olor*) population associated with Bray Harbour utilise the greenfield areas of the development site or have regular passage over the development site. Morning and evening vantage point surveys were undertaken on the 22<sup>nd</sup> February 2024, 23<sup>rd</sup> February 2024, 29<sup>th</sup> February 2024 (midday survey), 07<sup>th</sup> March 2024 and 8<sup>th</sup> March 2024.

A Phase 1 Habitat survey was undertaken during 24<sup>th</sup> May 2024 and 24<sup>th</sup> June 2024 and 3<sup>rd</sup> July 2024. The ecological surveys identified and recorded the dominant habitat types found within the Site were in line with published best practice (Smith et al., 2011), with habitats classified in line with the Heritage Council Classification scheme (Fossitt, 2000). Dominant plant species in each habitat type were recorded. Plant nomenclature followed the Botanical Society of Britain and Ireland's List of Accepted Plant Names (Botanical Society of Britain and Ireland, 2019). Invasive plant species noted while on Site were also recorded.'

In addition, a Tree Survey was undertaken by Independent Tree Surveys during February 2024 for the proposed development. The significant individual trees inside the Site were assessed from ground level using Visual Tree Assessment (VTA) techniques and relevant observations and findings were recorded in compliance with the industry standard document BS5837: Trees in relation to design, demolition and construction (2012).

## **2025 Surveys**

The proposed development site was subject to a walkover survey on 17<sup>th</sup> February 2025 by AtkinsRéalis ecologists. Additional ecological surveys were undertaken on 29<sup>th</sup> April 2025 which included identifying primary



habitats and plant species, a survey for terrestrial mammal activity and a bat emergence survey to determine if there are any bat roosts accommodated within the scattered trees found within the development site.

Site surveys evaluated the importance of the development site to flora and fauna in line with the approach set out in the Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater, Coastal and Marine (CIEEM, 2018, 2024 reissue).

## 2.5.5 Landscape and Visual Amenity

There are no protected views or prospects within the vicinity of the development and the site is not within a defined landscape character area (DLRCC). A Landscape Report was created (BSLA, 2025) which will be submitted with this application, to provide strong connectivity throughout the development, linking it to surrounding residential areas, Corke Abbey Valley Park, the nearby Ravenswell Schools, the future second phase of the Sea Gardens development, the River Dargle walkway, and extending all the way to Bray Harbour, the Promenade, and the town center. This will be achieved through the creation of a series of diverse and meaningful public open spaces, each with its own unique character that reflects its surroundings and intended use. An extensive planting scheme will be incorporated, featuring native species that enhance biodiversity and integrate the site with the surrounding landscape. The design will incorporate green infrastructure, such as sustainable drainage systems (SuDS), to manage stormwater and increase the site's resilience to climate change. Features like rain gardens, swales, and permeable paving will improve surface water management while enhancing the site's visual and ecological quality. A key element of the strategy is preserving existing boundary vegetation and incorporating native planting to support wildlife corridors and ecological diversity. This includes retention of the existing mature vegetation along the north eastern boundary which will maintain existing bat flight routes which have been identified within the ecological surveys carried out for the site.

A Landscape and Visual Impact Assessment was created to accompany this submission (Model Works, 2025). The landscape sensitivity of the receiving environment can be classified 'low-medium'. The site has frontage to the coast and sea to the east and to a large, wooded open space to the north. Both of these landscape types are recognised as providing favourable context for building height. Additionally, there are no sensitive receptors (e.g. houses or cultural heritage features) in close proximity in either direction. The site is well buffered – by separation distance, vegetation and other similar development from any sensitive receptors such as existing housing. The magnitude of landscape change which would result from the proposed development is 'low' as the proposed development is a change to an already permitted building and the site/building is located in a large area in process of transformative change. The significance of the landscape effects is classified as 'slight'. The assessment found that the proposal would cause no significant negative landscape or visual impacts. Overall, the proposal represents a considered response to the site's local and wider landscape contexts.

## 2.5.6 Water Resources

There are no EPA watercourses within the study area site. However, there are two rivers located in the general vicinity of the proposed development. The Rathmicheal Stream is located ca. 25m north of the proposed development and flows in an easterly direction prior to discharge to the Dargle Estuary and subsequently the Southwestern Irish Sea - Killiney Bay coastal waterbody. The River Dargle is located ca. 230m south to the proposed development and flows in an easterly direction prior to discharge to the Dargle Estuary and subsequently the Southwestern Irish Sea - Killiney Bay coastal waterbody. Bray harbour is located ca. 250m southeast of the Site and is an important amenity for the local population.

The River Dargle and Rathmichael stream have 'good' overall water quality status for the 2016 to 2021 monitoring period and are 'not at risk' of failing to meet the relevant Water Framework Directive (WFD) objectives by 2027 (EPA, 2025).

The Site is within the Wicklow Ground Groundwater Body (GWB) (European Code: IE\_EA\_G\_076). The Wicklow GWB has 'good' overall regional groundwater status for the 2016 to 2021 monitoring period with its risk of failing to meet the relevant Water Framework Directive (WFD) objectives by 2027 reported to be 'At risk' (EPA, 2025).



The GSI provides a methodology for aquifer classification based on resource value (regionally important, locally important and poor) and vulnerability (extreme, high, moderate or low). Resource value refers to the scale and production potential of the aquifer whilst vulnerability refers to the ease with which groundwater may be contaminated by human activities (vulnerability classification primarily based on the permeability and thickness of subsoils). According to the GSI (2025) the site is underlain by a locally important bedrock aquifer.

Groundwater vulnerability (in the bedrock aquifer) is predominantly directly beneath the proposed project as 'Moderate' with the lands further north from the site 'high' with the land further south 'low' (GSI, 2025).

The Site intercepts 2no. wells; IE\_GSI\_GW\_Well\_34643 a borehole located within 1km accuracy, and IE\_GSI\_GW\_Well\_34894 a spring located within 5km accuracy. Several other boreholes and springs are reported to be present within the immediate vicinity (2km radius) of the Site; however, none of these are reported by the GSI (2025) to be used for potable use or for major groundwater abstraction. There are no public supply wells or public drinking water protection areas within 15km of the Site.

## 2.5.7 Flood Risk

A Stage 1 Flood Risk Assessment (FRA) was conducted by AtkinsRéalis (2025) in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities which concluded that; *"In relation to the proposed Sea Gardens, Block A, Bray, based on the Stage 1-Flood Risk identification findings discussed above, the flood risk study shall be concluded at this point as the proposed site is not at risk from flooding"*.

The key conclusions are summarised as follows;

- There is no historic risk of flooding at the site.
- The OPW CFRAM flood extent maps studies have been carried out in the area of the site and therefore do not show any flood risk at the site. On the basis of the maps the site could be considered to be located within Flood Zone C, low probability of flooding.
- Given that the proposed development site is located in Flood Zone C, low probability of flooding, it is meeting the normal range of proper planning and sustainable development requirements.
- The proposed development is not at risk of flooding from the 1% AEP event (Zone C).
- Surface water runoff can be managed through the use of SuDS prior to discharged to the Dargle River if seemed suitable based on the final storm drainage design.

The following recommendations should be considered;

- Appropriate Sustainable Drainage systems are to be used within the proposed development to reduce surface water runoff from the site where feasible and designed in accordance with DLRCC Stormwater Management Policy and WCC requirements.
- It is noted that the previous agreement with WCC in relation to the Bray Sea Gardens Phase 1 was to allow for free discharge to the Dargle River without any flow control in place. This is based on the river being Tidal at the point of outfall and following guidance set out in DLRCC Development Plan. This does not increase flood risk and therefore deemed acceptable at this site location.

## 2.5.8 Cultural Heritage

The Sea Gardens Phase 1 lands, including the subject site, have previously been subject to several archaeological investigations undertaken by John Cronin & Associates as part of the planning process. These investigations include a geophysical survey (Detection Licence No. 20R02014) followed by a programme of targeted archaeological test trenching and metal detection (Excavation Licence No. 20E0482, Detection Licence No. 20R0179). A programme of archaeological monitoring of topsoil stripping within greenfield areas of the Sea Gardens Phase 1 lands was carried out under Excavation Licence No. 22E0552 in response to Condition no. 28

attached to grant of planning permission (ABP 311181-21). An area of approximately 3.4 hectares was archaeologically monitored and nothing of an archaeological nature was found. The monitored area included the western portion of the proposed Block A site. The current line of the county boundary which forms the southern boundary of the subject site is defined by a linear earthwork which has been designated as a recorded archaeological monument and is included in the Record of Monuments and Places (RMP) for County Dublin and Wicklow (DU026-124- ---, WI004-005----). The original designation of this feature as a recorded archaeological monument was based on a theory that the earthwork represented the remains of the 'Pale' ditch which surrounded the Dublin region in later medieval times. According to local information the linear earthwork is known as the 'Nuns Walk', recalling the use of the earthwork as a delineated pathway through the golf club to the seashore from the adjoining Ravenswell Convent to the south. Recent archaeological investigations undertaken for the Sea Gardens Phase 1 development suggests that the feature was formed as a result of the landscaping associated with the northern expansion of the Bray Golf Club into the former grounds of Ravenswell House in the early 20th century. This expansion included the proposed Block A site which was developed as part of the golf course at this time. Hand excavated trenches across the recorded linear earthwork (DU026-124 / WI004-005) were excavated under licence from the Department of Housing, Local Government and Heritage (Excavation Licence 20E0482). These trenches confirmed the earthwork to be a late 19th - or early 20th -century landscape feature. The archaeological monitoring of the removal of topsoil from a segment of the earthwork identified a circa 1m wide linear ditch with red brick fragments and mortar on its surface which also contained a quantity of 18th /19th century ceramics. The excavators concluded that the linear earthwork is not archaeological in nature.

Condition No. 29 of planning permission (ABP-311181-21) required the linear earthwork to be incorporated in some regard into the design of the proposed development from the western to the eastern boundary. However following the submission of archaeological reporting to the National Monuments Service (NMS) of the Department of Housing, Local Government and Heritage, Ms Maeve O'Callaghan, Archaeologist with NMS stated the following (in an email) in relation to Condition No. 29: '*...the National Monuments Service concurs with the findings of the archaeological work completed on site to date which suggest that the recorded linear earthwork (WI005-005--- DU026-124) is unlikely to be archaeological in nature. The archaeological report states that "the linear earthwork within the development site boundary was formerly thought to represent a section of the Pale ditch, however recent archaeological investigations has shown that it is, in fact, a 19th or 20th century landscape feature."* The National Monuments Service concurs with this conclusion and does not consider it necessary to erect interpretative signage relating to the Pale Ditch'.

The archaeological monitoring report for Excavation Licence No. 22E0552 concluded that the residual greenfield land within the Sea Gardens Phase 1 development site retain an archaeological potential and recommended that future topsoil stripping in such areas would be subject to a programme of licenced archaeological monitoring. This recommendation still applies to greenfield areas within the proposed Phase 1 Block A development site. The letter of commentary on the revised proposals for Block A of Phase 1 Sea Gardens confirmed that the revised development proposal currently under consideration does not affect or alter the findings and mitigation recommendations presented in previous archaeological assessments and reports issued in relation to the Sea Garden Phase 1 lands (John Cronin & Associates, 2025).

## 2.5.9 Traffic & Transportation

In relation to transport, the Contractor will utilise a Traffic Management Control Plan to mark relevant identified receptors so that construction impacts on them can be considered.

A Traffic Impact Assessment (AtkinsRéalis, 2025) has been produced to accompany this planning application assessing the transport impacts of the development on the surrounding environment. which concluded; '*Block A has been designed to align with the permitted and under-construction street and road network within the masterplan lands. The development embraces sustainable transport principles, including: Reduced car parking provision in line with national and local policies, High-quality cycle parking facilities, Enhanced permeability and connectivity, encouraging walking, cycling, and public transport use. These measures are expected to minimise traffic generation and reduce the overall traffic impact of the Sea Gardens Masterplan on the surrounding road*



*network. Traffic impacts from the proposed development are negligible, with: Less than 1% increase at external junctions and impacts falling below thresholds set by the TII Transport Assessment Guidelines. The TIA concludes that the proposed development will support efficient, low-impact, and sustainable transportation for future residents and the wider community’.*

A Mobility Management Plan (AtkinsRéalis, 2025) was also developed to accompany this planning application and sets out a strategy designed to promote travel by active and sustainable modes to the proposed development. The report concluded that *‘The implementation of this MMP will deliver long-term benefits for residents, the local community, and the environment. By prioritising active travel and public transport, the plan supports Ireland’s climate action goals and promotes a healthier, more sustainable lifestyle. With a robust monitoring framework in place, the MMP will remain adaptive to evolving needs, ensuring its effectiveness in fostering sustainable travel choices over time’.*

## **2.5.10 Population and Human Health**

The proposed development is located just within the Shankill-Shanganagh Electoral Division which has a total population of 5,522 and is just above the county border line of the next electoral division Bray which has a total population of 1,876 (CSO, 2022). The town of Bray as a whole which is the surrounding area of the development has a total population of 33,512 (CSO, 2022). Sensitive receptors near to the proposed development include; nearby residential estates, Bray Harbour (240m), Progress Electroplating & Manufacturing Company Limited (175m), Back strand bray hiking area (90m), Woodbrook Golf Club (180m), Corke Abbey Valley Park (10m), Solus Tower Industrial Estate (300m), North Wicklow Educate Together Secondary School (520m), Saint John of God Community Services, Ravenswell (400m), Ravenswell Primary School (290m) and Coláiste Ráithín Secondary School (170m).

Local Services / Amenities (Social Infrastructure) includes a wide range of services and facilities covering education, community, recreation and sports facilities that contribute to the quality of life.

## 3. Legislation and Guidance

All parties, contractors and consultants working on this project shall be subject to the laws of Ireland and the various international/regional protocols and agreements to which Ireland is a party. In the event that legislation is updated the latest version shall be followed. All relevant new legislation will be followed as appropriate. This document outlines most current legislation at the date of issue. It is the responsibility of the Contractor to ensure that they are up to date with the details of the latest iterations of legislation relevant to the project throughout the duration of the contract.

The Designer should be aware of all key environmental risks and associated measures set out within this CEMP, and the final detailed design should take due cognisance of these where relevant.

The Contractor should set out the CEMP in a clear format and must address all key environmental risks and associated measures. The Contractor must be aware of and comply with the legislation and guidance set out in this document, any specific planning conditions which may be associated with the proposed development, and other relevant documentation as prescribed by the Employer and planning authority.

### 3.1 Legislation

It should be noted that the appointed Contractor will be required to be aware of their obligations under legislation. Such legislation, includes, but is not restricted, to:

- Planning and Development Act, 2000, as amended 2017 (S.I. No. 20 of 2017), 2018 (S.I. No. 16 of 2018), 2020 (S.I. No. 92 of 2020), 2021 (S.I. No. 18 of 2021) and 2022 (S.I. No. 75 of 2022) and 2025;
- Planning and Development Regulations 2001 to 2025;
- The Birds Directive: Council Directive of 2 April 1979 on the conservation of wild birds (79/409/EEC);
- The Birds Directive: Council Directive 2009/147/EC on the conservation of wild birds;
- The Habitats Directive: Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora;
- The European Communities (Birds and Natural Habitats) Regulations, 2011 (S.I. 477 of 2011), as amended, 2013 (S.I. No. 499 of 2013), 2015 (S.I. No. 355 of 2015) and 2021 (S.I. No. 293 of 2021);
- Water Framework Directive (WFD): Directive 2000/60/EC of the European Parliament and Council establishing a framework for Community Action in the field of water policy, as amended;
- European Communities Environmental Objectives (Surface Waters) Regulations, 2009, S.I. No. 272 of 2009, as amended, 2012 (S.I. No. 327 of 2012), 2015 (S.I. No. 386 of 2015), 2019 (S.I. No. 77 of 2019), 2021 (S.I. No. 659 of 2021), 2022 (S.I. No. 288 of 2022), 2023 (S.I. No. 410 of 2023), 2025 (S.I. No. 50 of 2025);
- European Communities Environmental Objectives (Groundwater) Regulations 2010, S.I. No. 9 of 2010, as amended, 2016 (S.I. No. 366 of 2016), 2022 (S.I. No. 287 of 2022), 2025 (S.I. No. 50 of 2025);
- European Communities (Environmental Liability) Regulations, 2008, S.I. No. 547 of 2008, as amended, 2011 (S.I. No. 307 of 2011), 2015 (S.I. No. 293 of 2015);
- European Communities (Shipments of Hazardous Waste Exclusively within Ireland) Regulations 2011, S.I. No 324 of 2011;
- European Communities (Transfrontier Shipment of Waste) Regulations 1994 (S.I. No. 121 of 1994);
- European Union (Waste Electrical and Electronic Equipment) Regulations 2014 (S.I. No. 149 of 2014), as amended 2019 (S.I. No. 233 of 2019);
- European Union (Drinking Water) Regulations, 2014, S.I. No. 122 of 2014, as amended 2017 (S.I. No. 464 of 2017), as amended 2022 (S.I. No. 286 of 2022), 2023 (S.I. No. 99 of 2023);

- Waste Framework Directive 2008/98/EC of the European Parliament and Council on waste, as amended 2018 (S.I. No. 851 of 2018);
- Waste Management Acts of 1996 to 2025;
- The Water Pollution Acts of 1977 & 1998;
- Water Framework Directive (WFD): Directive 2000/60/EC of the European Parliament and Council establishing a framework for Community Action in the field of water policy, as amended;
- The Wildlife Acts 1976 to 2024;
- Water Policy Regulations 2003, S.I. No. 722 of 2003, as amended, 2005 (S.I. No. 413 of 2005), 2008 (S.I. No. 219 of 2008), 2010 (S.I. No. 93 of 2010) and Amendment (No. 2) Regulations, (S.I. 326 of 2010) & EU Water Policy Regulations 2014 (S.I. 350 of 2014), 2018 (S.I. No. 261 of 2018), 2022 (S.I. No. 166 of 2022), 2025 (S.I. No. 52 of 2025);
- Water Conservation Regulations 2008, S.I. No. 527 of 2008;
- Guidelines on protection of fisheries during construction works in and adjacent to waters (IFI, 2016);
- Litter Pollution Act of 1997 to 2025;
- Litter Pollution Regulations 1999, S.I. No. 359 of 1999);
- Waste Management (Facility Permit and Registration) Regulations 2007, S.I. No. 821 of 2007, as amended, 2008 (S.I. No. 86 of 2008), 2015 (S.I. No. 198 of 2015), 2019 (S.I. No. 250 of 2019), 2023 (S.I. No. 471 of 2023);
- Waste Management (Collection Permit) Regulations 2007, S.I. No. 820 of 2007), as amended, 2015 (S.I. No. 197 of 2015), 2016 (S.I. No. 24 of 2016), 2023 (S.I. No. 63 of 2023) & (S.I. No. 104 of 2023);
- Waste Management (Licensing) Regulations 2004 (S.I. No. 395 of 2004) as amended 2010 (S.I. No. 350 of 2010);
- Environment (Miscellaneous Provisions) Act 2011, as amended 2019;
- Waste Management (Landfill Levy) Regulations 2008, S.I. No. 199 of 2008, as amended 2009, (S.I. No. 550 of 2009), 2010 (S.I. No. 31 of 2010), 2012 (S.I. No. 221 of 2012), 2013 (S.I. No. 194 of 2013), 2015 (S.I. No. 189 of 2015), 2019 (S.I. No. 182 of 2019), 2023 (S.I. No. 398 of 2023), 2024 (S.I. No. 442 of 2024);
- Waste Management (Hazardous Waste) Regulations, 1998, as amended, 2000 (S.I. No. 73 of 2000);
- Waste Management (Shipment of Waste) Regulations 2007, S.I. No. 419 of 2007;
- Waste Management (Movement of Hazardous Waste) Regulations, 1998 (S.I. No. 147 of 1998);
- Waste Management (Transfrontier Shipment of Waste) Regulations 1998, as amended, 2014 (S.I. No. 861 of 2014);
- Waste Management (Tyres and Waste Tyres) Regulations 2007 (S.I. No. 664 of 2007), 2017, as amended (S.I. No. 400 of 2017) and 2018 (S.I. No. 96/2018);
- European Union Batteries and Accumulators Regulations 2014, S.I. No. 283 of 2014, as amended, 2014 (S.I. No. 349 of 2014), 2015 (S.I. No. 347 of 2015);
- Waste Management (Registration of Brokers and Dealers) Regulations 2008, SI No. 113 of 2008;
- Waste Management (Prohibition of Material Disposal by burning) Regulations 2009, S.I. No. 286 of 2009, as amended 2013 (S.I. No. 504 of 2013), 2017 (S.I. No. 599 of 2017), 2019 (S.I. No. 684 of 2019), 2022 (S.I. No. 51 of 2022), and 2023 (S.I. No. 16 of 2023);
- European Communities (Waste Directive) Regulations 2011, (S.I. No. 126 of 2011);
- European Waste Catalogue (EWC) and Hazardous Waste List 2002, 2015 and 2018;
- Waste Management (Food Waste) Regulations 2009, S.I. No 508 of 2009, as amended, 2015 (S.I. No. 430 of 2015), 2024 (S.I. No. 294 of 2024);
- Protection of the Environment Act 2003;
- European Union (Properties of Waste Which Render It Hazardous) Regulations 2015, S.I. No. 233 of 2015, as amended, 2018 (S.I. No. 383 of 2018);

- Air Pollution Act, 1987 (Air Quality Standards) Regulations, 1987, as amended, 2002 (S.I. No. 271 of 2002), 2011 (S.I. No. 180 of 2011), 2016 (S.I. No. 659 of 2016), 2022 (S.I. No. 739 of 2022), 2025 (S.I. No. 104 of 2025);
- Air Pollution Act, 1987 (Emission Limit Values for use of Asbestos) Regulations, 1990 (S.I. No. 28 of 1990);
- European Communities (Control of Emissions of Gaseous & Particulate Pollutants from Non-Road Mobile Machinery) Regulations 2007, S.I. No.147 of 2007, as amended, 2011 (S.I. No. 263 of 2011), 2012 (S.I. No. 407 of 2012), 2013 (S.I. No. 417 of 2013), 2016 (S.I. No. 2016/1628);
- The EU Regulation 2037/2000 (CFC's, HCFC's, Halons) - Ozone Depleting Substances. Control of Substances that Deplete the Ozone Layer Regulations 2006, S.I. No 281 of 2006, as amended, 2011 (S.I. No. 465 of 2011);
- European Union 2008/50/EC -Ambient Air Quality and Cleaner Air for Europe (CAFE) Directive, 2008;
- Air Quality Standards Regulations 2011, (S.I. No. 180 of 2011);
- EU Directive 2008/50/EC – Ambient air quality Directive European Communities (Ambient Air Quality Standards Regulations), 2022 (S.I. No. 739 of 2022);
- EU F Gas Regulations 2006, as amended, 2014, S.I. No. 517 of 2014, 2019 (S.I. No. 367 or 2019);
- Environmental Protection Agency Act 1992 (Noise) Regulations, 1994 S.I. 174 of 1994;
- Environmental Noise Regulations 2006, (S.I. No. 140 of 2006), as amended 2018 (S.I. No. 549 of 2018), 2021 (S.I. No. 663 of 2021);
- European Communities (Noise Emission by Equipment for use Outdoors) Regulations, 2001, S.I. No. 632 of 2001, as amended, 2006 (S.I. No. 241 of 2006);
- European Communities (Construction Plant and Equipment) (Permissible Noise Levels) Amendment Regulations 1996, (S.I. No. 359 of 1996);
- Local Government (Planning and Development) Act 1963 (S.I. No. 28 of 1963), as amended 1993 (S.I. No. 12 of 1993);
- European Communities Conservation of Wild Bird Regulations 1985, S.I. No. 291 of 1985, as amended, 1986 (S.I. No. 48 of 1986), 1995 (S.I. No. 31 of 1995), 1997, (S.I. No. 210 of 1997), 1998 (S.I. No. 154 of 1998), (S.I. No. 131 of 1999), 2005 (S.I. No. 716 of 2005), 2010 (S.I. No. 65 of 2010), 2011 (S.I. No. 626 of 2011), 2012 (S.I. No. 84 of 2012), 2013 (S.I. No. 281 of 2013), 2019 (S.I. No. 178 of 2019);
- Noxious Weed Act, 1936, S.I. No. 38 of 1936;
- Noxious Weed Order, 1937, S.I. No. 103 of 1937;
- Flora (Protection) Order, 2015 (S.I. No 356 of 2015), 2022 (S.I. No. 235 of 2022);
- The Forestry Act, 1946, (S.I. No. 13 of 1946), as amended, 2009 (S.I. No. 40 of 2009) & Forestry Act, 2014 (S.I. No. 31 of 2014);
- Forestry Regulations, 2017 (S.I. No. 191 of 2017), as amended 2020 (S.I. No. 31 of 2020), (S.I. No. 39 of 2020) & (S.I. No. 416 of 2020), 2023 (S.I. No. 445 of 2023);
- The National Monuments Act 1930, S.I. No. 2 of 1930, as amended, 2004 (S.I. No. 22 of 2004);
- European Union (Environmental Impact Assessment and Habitats) (Section 181 of the Planning and Development Act 2000) Regulations, 2013 (S.I. No. 403 of 2013), 2015 (S.I. No. 301 of 2015), 2019 (S.I. No. 418 of 2019);
- European Union (Environmental Impact Assessment and Habitats) (Environmental Impact Assessment) Regulations, 2018, (S.I. No. 296 of 2018); and,
- Safety, Health and Welfare at Work (Exposure to Asbestos)(Amendment) Regulations 2006 (S.I. No. 386 of 2006), 2010 (S.I. No. 589 of 2010).

## 3.2 Industry Guidance

The Contractor should take due consideration of, and incorporate best practice guidance, including but not limited to the following:

- BS 5837/2012. Trees in relation to design, demolition and construction;
- BS 3998; 2010. Tree Work. Recommendations;
- CIRIA (2001). C532. Control of water pollution from construction sites. Guidance for consultants and contractors;
- CIRIA (2006). C648. Control of water pollution from linear construction projects. Technical Guidance;
- CIRIA (2008). C679. Invasive species management for infrastructure managers and the construction industry.;
- CIRIA (2015). C741. Environmental Good Practice on Site;
- CIRIA (2015). C753. The SuDS Manual;
- Environmental Protection Agency (2021). 'Best Practice Guidelines for the preparation of resources & waste management plans for construction & demolition projects'
- Invasive Species Ireland (2016). Best Practice Management Guidelines. Japanese knotweed;
- National Roads Authority (NRA) (2008). Guidelines for the Crossing of Watercourses during the Construction of National Road Schemes;
- NRA (2005). Guidelines for the Treatment of Badger Prior to the Construction of National Road Schemes;
- NRA (2008). Guidelines for the Treatment of Otters prior to the Construction of National Road Schemes;
- NRA (2006). Guidelines for the Protection and Preservation of Trees, Hedgerows and Scrub Prior to, During and Post Construction of National Road Schemes;
- NRA (2010). Guidelines on the Management of Noxious Weeds and Non-Native Invasive Plant Species on National Roads (Revision 1); and,
- Sustainability & Environmental Appraisal (March 2020) LA 120 Environmental management.

## 4. Project Roles & Responsibilities

For the purposes of clarity, the roles and responsibilities of the project team for the proposed development should be determined at the very outset of the Construction Stage of this project. Key roles are listed in Table 4.1. These are typically performed by the Client, Engineer and Contractor as presented below. Specific details will be determined upon the Detailed Design and Contract stage.

**Table 4.1 - Roles and Responsibilities**

<b>Employer</b>	<b>Planning Agents</b>
The Client: Ballymore Group Tel: +353 (0)1 625 9100 Contact: Ken Sweeney	The Planner: RPS Tel: +353 1 488 2900 Contact: Carl Mogensen
<b>Employers Representative</b>	<b>Design Team</b>
The Engineer: AtkinsRéalis Tel: 01 8108000 Contact: Garry Hanratty	The Architect: Glenn Howell Architects Tel: +44 12 1666 7640 Contact: Stephen Jackson
<b>Project Supervisor for the Design Process (PSDP)</b>	<b>Civil, Structural and Environmental Team</b>
The Engineer: to be confirmed Tel: to be confirmed Contact: to be confirmed	The Environmental Consultant: to be confirmed Tel: to be confirmed Contact: to be confirmed
<b>Masterplan Architect</b>	<b>Landscape Architect</b>
The Engineer: Glenn Howells Architects Tel: +44 12 1666 7640 Contact: Stephen Jackson	The Landscape Architect: BSLA Tel: to be confirmed Contact: to be confirmed
<b>Project Supervisor Construction Stage (PSCS)</b>	<b>Contractor</b>
The Contractor: to be confirmed Tel: to be confirmed Contact: to be confirmed	The Contractor: to be confirmed Tel: to be confirmed Contact: to be confirmed

### 4.1 The Client/Employer

Shankill Property Investments Limited will be responsible for ensuring that competent parties are appointed to undertake the construction and that sufficient resources are made available to facilitate the appropriate management of risks to the environment.



## 4.2 Environmental Manager

An Environmental Manager will be appointed by the Contractor to ensure that the CEMP is effectively implemented. The Environmental Manager will be a suitably qualified, competent and experienced professional that would perform the necessary tasks, review environmental procedures and consult with the members of the construction team and stakeholders as required. The Environmental Manager will be responsible for:

- Ensuring that the CEMP and all relevant documents such as environmental control plans is developed, implemented and maintained on site;
- Ensuring compliance with the Conditions of the Planning Permission;
- Ensuring the mitigation measure set out in the CEMP are implemented;
- Ensuring that construction occurs in accordance with the relevant environmental requirements and that such compliance is adequately recorded and documented;
- Conducting regular environmental inspections and compiling an environmental compliance report on a monthly basis; Attending site and stakeholder meetings as required;
- Keeping up-to-date with relevant environmental best practice and legislative changes;
- Ensuring all staff have undertaken adequate environmental inductions, awareness briefings and training;
- Dealing with environmental complaints; and
- Managing and responding to environmental incidents and ensuring that all incidents are recorded and reported in an appropriate manner.

## 4.3 Construction Director

The Construction Director will be responsible for the overall execution and organisation of all environmental related activities, as appropriate. Some responsibilities of the Construction Director will comprise the following:

- Overall responsibility for the implementation of the CEMP;
- Allocating the correct resources in order to ensure the successful implementation of the CEMP; and,
- Assisting in the management review of the CEMP for suitability and effectiveness.

## 4.4 Construction Manager

The Construction Manager is directly responsible to the Construction Director in assisting with the successful execution of the Proposed Development. The responsibilities of the construction manager in respect of the CEMP comprise the following:

- To report to the Construction Director on the on-going performance and development of the CEMP;
- To discharge his/her responsibilities as per the CEMP; and,
- To support and augment the Construction Management Team (CMT) through the provision of adequate resources and facilities for the duration of the implementation of the CEMP.

# 5. Environmental Procedures

# Management

## 5.1 General

The Contractor will be required to have a recognised environmental management system such as ISO 14001:2015 or be able to demonstrate that they are actively working towards implementing such a system.

The works Contractor will undertake the works in accordance with the provisions of the CEMP. The CEMP will be updated by the Contractor to address any subsequent planning conditions relevant to the proposed development and will be reviewed by the Employer and/or the Employer's Representative. The Contractor will review and add to the CEMP as appropriate and shall issue the updated CEMP. A record of the review and any recommendations will also provide (for review and approval by the Employer and/or the Employer's Representative) Environmental Control Plans (ECPs), which will be maintained and updated in accordance with the CEMP. ECPs will include (if applicable), but will not be restricted to:

- Air Quality Control Plan;
- Construction Noise and Vibration Control Plan;
- Pollution Prevention Control Plan;
- Water Resources and Energy Use Control Plan;
- Ecological Control Plan;
- Light Pollution Control Plan;
- Archaeological and Cultural Control Plan;
- Traffic Management Control Plan;
- Contamination Land Control Plan; and,
- Soil Erosion and Sedimentation Control Plan.

Guidance on the development of the Control Plans is located in Section 7 of this document.

## 5.2 Environmental Policy

Contractors shall have an environmental policy dated and signed by the most senior person in the company. The policy shall:

- Be appropriate to the nature, scale and environmental impacts of the organisations activities, products and services;
- Include a commitment to continual improvement in environmental performance;
- Include a commitment to comply with all applicable legislation and with other requirements to which the organisation subscribes which relate to its environmental aspects;
- Provide a framework for setting and reviewing objectives and targets;
- Be documented, implemented and maintained;
- Be communicated to all persons working for or on behalf of the organisation; and
- Be available to the public.

## 5.3 Environmental Aspects

Contractors are expected to use a qualitative approach to identify and evaluate potential environmental aspects along with any controls to prevent or mitigate environmental damage. A simple risk matrix (as follows) facilitates quick reference and assignment of risk levels for each environmental aspect:

- Extreme/serious risk;
- High risk;
- Moderate risk; and,
- Low risk.

All environmental aspects rated as High or Extreme/Serious will be classified as significant and will require control or mitigation measures to manage the risk. All environmental aspects covered by a legal requirement, for example an Environmental Permit condition will also be classified as significant even if the risk is low or moderate.

**Table 5.1 – Example of Qualitative Risk Matrix**

Severity	People	Assets	Environment	Reputation	Probability				
					Impossible / Rare	Improbable / Possible	Probable / Likely	Very Likely / Often	Certainty/ Frequent
<b>Catastrophic</b>	Multiple fatalities or permanent total disabilities	Extensive damage	Massive effects	International impact				Extreme / Serious Risk	
<b>Severe Major</b>	Single fatality or permanent total disability	Major damage	Major effect	National impact		High Risk			
<b>Critical Moderate</b>	Major injury or health effects	Local damage	Localized effect	Considerable impact					
<b>Marginal Minor</b>	Minor injury or health effects	Minor damage	Minor effect	Minor impact		Moderate Risk			
<b>Negligible / Insignificant</b>	Slight injury or health effects	Slight damage	Slight effect	Slight impact	Low Risk				

The Contractor shall record the results of the qualitative risk analysis in an Aspects and Impacts Register (Table 5.2).

**Table 5.2 – Example of Aspects and Impacts Register**

Environmental Aspect	Environmental Impact	Risk Rating	Control Measures / Mitigation	Risk Rating After Control
Use of fuel storage tanks on site	Potential contamination of water and land	High Risk	Double skinned tank, bunding, location on hard standing, emergency spill procedure and equipment and training	Moderate Risk

## 5.4 Training, Awareness and Competence

The Contractor (and their sub-contractors) would be selected with due consideration of relevant qualifications and experience. The Contractor will be required to employ construction staff with appropriate skills, qualifications and experience appropriate to the needs of the works to be carried out during construction.

A site induction will be provided to all construction staff before they commence work on site. Where appropriate, the Contractor will identify specific training needs for the construction workforce and will ensure that appropriate training requirements are fulfilled. A baseline level of environmental awareness will be established through the site induction programme. Site inductions will cover the following as a minimum:

- Introduction to the Environmental Manager;
- The requirements of the CEMP and consequences of non-compliance;
- The requirements of due diligence and duty of care;
- Identification of environmental constraints and potential impacts of the work;
- Procedures associated with incident notification and reporting including procedures for dealing with damage to the environment; and,
- The benefits of improved environmental and sustainability performance; and the potential consequences of departure from specified procedures, work instructions and method statements.

## 5.5 Meetings

The Environmental Manager will be responsible for arranging and holding monthly meetings with the Employer and/or the Employer’s Representative. The Environmental Manager will develop and distribute minutes on monthly meetings accordingly.

## 5.6 Monitoring and Inspections

For the duration of the contract, the environmental performance of the Contractor will be monitored through site inspections and audits. The programme for monitoring, inspections and audits shall be specified in the contract. The Contractor shall develop, implement and maintain an Environmental Inspections and Monitoring Plan.

Records of all inspections carried out should be maintained and all actions should be closed out in a reasonable time. If additional monitoring and inspections are required due to any subsequent planning conditions, these will be added to the CEMP.

## 5.6.1 Monitoring

Mitigation and monitoring will be carried out so that construction activities are undertaken in a manner that does not give rise to negative effects. Suitable monitoring programmes will need to be developed, implemented, documented and assessed in accordance with the specification outlined in the CEMP.

The results of all environmental monitoring activities will be reviewed by the Environmental Manager on an ongoing basis to enable trends or exceedance of criteria to be identified and corrective actions to be implemented as necessary.

## 5.6.2 Inspections

Inspections of construction activities will be carried out by the Environmental Manager on a daily basis to ensure all necessary environmental measures relevant to the construction activities are being effectively implemented by construction staff, ensuring legal and contractual conformity.

### 5.6.2.1 Daily Inspections:

The daily inspections should include, but not be limited to, checking that:

- The site boundary is marked out and respected;
- All waste is appropriately stored and segregated;
- Waste skips are covered to prevent wind-blown litter;
- Drip trays are in place for all stored equipment and plant;
- All chemicals/fuels are stored with appropriate containment/bunds/cover;
- Construction noise is within permitted limits and does not create a nuisance;
- Dust does not create a nuisance; and
- Fencing/hoarding is secure.

### 5.6.2.2 Weekly Inspections

The inspections should include, but not be limited to confirming that:

- Daily checklists have been completed;
- Waste storage areas have been checked and there is no build-up of waste materials;
- Spill kits have been checked and contain all relevant materials;
- The performance of all pollution control equipment has been checked and the equipment is working effectively;
- Noise reduction/monitoring equipment has been checked and is operating effectively;
- Septic tanks are not overfull/discharging; and
- Special control measures identified in Permit/Planning Conditions and the CEMP are adhered to.

## 5.7 Nonconformity and Corrective and Preventative Action

The Contractor shall establish, implement and maintain procedures to deal with actual and potential non-conformities and for taking corrective and preventative action.

Non-conformities may be identified through:

- Internal contractor audits;



- Audits by the Employer and/or the Employer's Representative;
- Audits undertaken by external certification bodies;
- Audits undertaken by regulatory authorities; and
- General observations.

The Contractor procedures shall define the requirements for:

- Identifying and correcting non-conformities;
- Mitigating the environmental impacts of non-conformities;
- Investigating non-conformities including identify root causes and implementing appropriate actions to avoid their reoccurrence;
- Evaluating the need for actions to prevent non-conformities and implementing appropriate actions designed to avoid their reoccurrence;
- Setting realistic timeframes for undertaking effective corrective and preventative actions;
- Recording the results of corrective and preventative actions taken; and
- Reviewing the effectiveness of corrective and preventative actions.

All actions identified should be appropriate to the nature and magnitude of the issue and the environmental impacts encountered.

## 5.8 Reporting

The Contractor will be required to submit a report, the frequency to be agreed with the Contractor and Employer and/or the Employer's Representative to the Employer and/or the Employer's Representative for review and approval. The report shall address the following as minimum:

- Summary of compliance with the CEMP including identification of any non-conformances;
- Interpretation of the results of ongoing monitoring;
- Detailed description of any issues and/or non-conformances identified during inspections and/or audits;
- Record of incidents and corrective actions (including Corrective Actions Reports as appropriate);
- Synopsis of environmental complaints received/queries raised by stakeholders; and
- Records of environmental training undertaken (as appropriate).

## 5.9 Environmental Records

The Contractor shall maintain records of all environmental documentation including monitoring, environmental compliance, test results, method statements and plans. All records will be kept up-to-date and be made available for audits, inspections and periodical reporting. The Contractor will maintain the following environmental records (as a minimum) that will be made available for inspection to the Employer and/or the Employer's Representative and the relevant authorities if required:

- Management plans;
- Records of environmental incidents;
- Environmental reports;
- Records of environmental training;
- Register of environmental complaints;
- Corrective Action Reports;
- Environmental inspection and audit reports;



- All monitoring data;
- Waste and chemical inventories; and
- Health and Safety records.



## 6. General Requirements

It is the responsibility of the Contractor to ensure compliance and to avoid and/or reduce significant adverse effects that have been identified at this preliminary juncture where practicable. Where the Contractor diverts from the methodologies and working areas outlined herein and/or defined in the granted planning consent and associated conditions that may be granted, it would be the responsibility of the Contractor to obtain the relevant licenses, permits and consents for any such changes.

### 6.1 Good Housekeeping

The Contractor will employ a 'good housekeeping' policy at all times. This will include, but not be restricted, to the following:

- General maintenance of working areas and cleanliness of welfare facilities and storage areas;
- Provision of site layout map showing key areas such as first aid posts, material storage, spill kits, material and waste storage, welfare facilities etc;
- Maintain all plant, material and equipment required to complete the construction work in good order, clean and tidy;
- Keep construction compounds, access routes and designated parking areas free and clear of excess dirt, rubbish piles, scrap wood, etc. at all times;
- Details of site managers, contact numbers (including out of hours) and public information signs (including warning signs) will be provided at the boundaries of the working areas;
- Provision of adequate welfare facilities for site personnel;
- Installation of appropriate security, lighting, fencing and hoarding;
- Effective prevention of oil, grease or other objectionable matter being discharged from the working area;
- Provision of appropriate waste management at each working area and regular collections to be arranged;
- Excavated material generated during construction will be reused on site as far as practicable and surplus materials/soils shall be recovered or disposed of to a suitably authorised waste facility site;
- Effective prevention of infestation from pests or vermin;
- No discharge of site run-off or water discharge without agreement of the relevant authorities; and
- Maintenance of public rights of way, diversions and entry/exit areas around working areas for pedestrians and cyclists where practicable and to achieve inclusive access.

### 6.2 Site Compound

All C&D waste materials will be segregated onsite into the various waste streams, via. labelled dedicated skips and storage areas. Waste will be removed from site by a suitably permitted waste haulage contractor. Each waste haulage contractor must hold a current valid waste collection permit issued by the National Waste Collection Permit Office (NWCPO).

The Proposed location of the site compound is shown on Figure 6-1. This location was selected to avoid any potential impacts to environmental receptors and to reduce any potential for impact on sensitive human receptors. The area north of the site compound will also act as a storage centre for construction materials. Storage of materials will be minimal. No large materials will be stored on site until such times as they are required. At no time during the project will materials or other items be placed outside the hoarding line. The exact locations of the compound areas will be agreed with the appointed contractor and Dún Laoghaire-Rathdown County Council prior to the commencement of development and will be used throughout the construction period.



Figure 6-1 – Site Compound Location

## 6.3 Hours of Working

### 6.3.1 Core Working Hours

The timing of construction activities, core working hours and the rate of progress of construction works are a balance between efficiency of construction and minimising nuisance and significant defects. The core construction working hours for the proposed development will be:

- 8am - 6pm, Monday to Friday; and
- 8am - 1 pm, Saturday

No working will be permitted on Sundays or Bank Holidays.

### 6.3.2 Start-up and shutdown

The Contractor may require a period of up to one hour before and one hour after core working hours for start-up and shutdown activities in working areas. Activities permitted may include deliveries and unloading of materials, movement of staff to their place of work, maintenance and general preparation works. The use of plant machinery likely to cause disturbance, will not be permitted outside of the core working hours.

### 6.3.3 Additional working hours

It may be necessary in exceptional circumstances to undertake certain activities outside of the construction core working hours. Any construction outside of the construction core working hours will be agreed by the Contractor in advance with Dún Laoghaire-Rathdown County Council and scheduling of such works shall have regard to nearby sensitive receptors.

In the case of work required in an emergency or which if not completed would be unsafe or harmful to workers, the public or local environment, Dún Laoghaire-Rathdown County Council will be informed as soon as reasonably practicable of the reasons and likely duration and timing (outside of the core working hours).

## 6.4 Security

Security will be the responsibility of the Contractor- who will provide adequate security to prevent unauthorised entry to or from the site. The following measures may be used to prevent unauthorised access:

- Install CCTV and security systems where required;
- Consult with neighbouring properties and local crime prevention officers including Dún Laoghaire-Rathdown County Council and An Garda Síochána on site security matters where required;
- Prevent access to restricted areas and neighbouring properties by securing equipment on site such as ladders and scaffolding; and
- When there is no site activity, close and lock site gates and set appropriate site security provisions as required.

## 6.5 Hoarding and Fencing

A site boundary in the form of hoarding or fencing will be established around each of the working areas before any significant construction activities commence in that working area. The hoarding/fencing shall be a secure boundary to what can be a dangerous environment for those that have not received the proper training and are unfamiliar with construction operations.

Site hoarding also performs an important function in relation to minimising nuisance and effects including:

- Noise emissions (by providing a buffer);
- Visual impact (by screening the working areas, plant and equipment); and
- Dust minimisation (by providing a buffer).

## 6.6 Services and Utility

Site services shall be installed as part of the works. Working areas will be powered by mains supplies or diesel generators where an electrical supply is not available.

Record drawings have been provided by utility companies and reviewed in relation to the proposed development in the Utilities Report (Metec, 2025) This report stated the following; *'The existing utilities infrastructure have been identified within the vicinity of the site. As this is a green field site, minimum utilities have been identified within the site boundary. No utility diversions will be required. The developer will need to liaise with ESB for a temporary supply for site compound use. Should the presence of any other utilities be discovered during the site clearance works, the relevant utility providers shall be contacted and with agreement, services shall be isolated and removed/altered prior to the commencement of site construction. New*

*infrastructure connections have been considered in the design of the proposed development and there are no known issues with local infrastructure to supply the new development at this time’.*

It is recommended that the Contractor obtains details of all underground services in advance of ground works. The Contractor will be responsible for undertaking their own service to establish the full extent of underground services prior to the commencement of construction to support any surveys already undertaken as part of early design work and statutory consent applications.

## 6.7 Lighting

The proposed lighting installation as stated in the Site Lighting Report (Metec, 2025) achieves the following:

- Luminaire selection limits upward light spill and takes cognizance of local wildlife.
- The lighting scheme achieves the recommended lux levels in accordance with current regulations and standards.
- The lighting scheme achieves good uniformity throughout the development to ensure good visibility at night.

## 6.8 Reinstatement of Working Areas on Completion

The Contractor will reinstate all working areas as work proceeds during construction. All plant, equipment, materials, temporary infrastructure and vehicles will be removed at the earliest opportunity and the surface of the ground restored as near as practicable to its original condition.

On completion of construction works the Contractor will ensure that all waste and potentially polluting material is removed from the site and is disposed of using appropriately authorised contractors as per the Construction RWMP (AtkinsRéalis, 2025). The Contractor shall, as appropriate, undertake rehabilitation of site compound and other areas no longer to be used by the Contractor. Following site clearance and rehabilitation the Employer or Employer’s Representative will undertake a final inspection of the site. Any environmental issues identified during the final inspection will be raised with the Contractor. Mitigation measures and timeframes for completion will be agreed between the Contractor and the Employer’s Representative in line with agreed procedures prior to final sign off.

## 6.9 Health and safety

The Contractor would be required to ensure all relevant health and safety, fire safety and security requirements are in place prior to the commencement of construction and in accordance with the relevant legislation requirements in addition to the specifications of Dún Laoghaire-Rathdown County Councils.

Relevant Irish and EU health and safety legislation would be complied with at all times by all construction staff and personnel during construction. Further, the Contractors would also have to ensure that all aspects of their works comply with good industry practice and all necessary consents, licenses and authorisations have been put in place for the proposed development.

# 7. Environmental Management and Controls

The Contractor will be required to have due regard to and incorporate any additional requirements where relevant from any planning conditions which may apply.

## 7.1 Waste Management

Construction activities produce a broad range of wastes, as outlined in the Construction RWMP (AtkinsRéalis, 2025).

This section identifies the potential types of waste which may arise from construction and provides guidance on the management, control and disposal of waste.

### 7.1.1 Risk Identification

Contractors shall undertake a qualitative waste management risk assessment or appraisal prior to the commencement of construction activities. An example assessment is shown in Table 7.1

**Table 7.1 – Example of Waste Management Risk Assessment**

Risk Assessment	Example Procedure
01	Identify the location of all sensitive receptors within or adjacent to the construction site.
01	<p>Mark up on a site plan with the location of all adjacent housing/commercial centres, schools and educational establishments, agricultural land and other potential receptors.</p> <p>This will help the planning of the overall layout of the construction site and enable the identification of suitable sites for high-risk activities such as waste storage areas.</p>
02	Identify the construction activities and sources of that may result waste production and waste storage, segregation and disposal requirements.
02	These could include excavations, chemical and materials use, waste storage and bulking areas etc.
03	Implement mitigation to eliminate or reduce risks.
03	<p>Use the following hierarchy to manage waste:</p> <ol style="list-style-type: none"> <li>1. Prevent - Do not generate the waste in the first place.</li> <li>2. Re-use – Can you re-use without treatment?</li> <li>3. Recycle – Make sure that wastes are properly segregated to aid recycling.</li> <li>4. Disposal with energy recovery</li> <li>5. Disposal without energy recovery</li> </ol>

### 7.1.2 Waste Management

Contractors should develop, implement and maintain a Resource and Waste Management Plan that is in compliance with Dún Laoghaire-Rathdown County Councils and includes all requirements from the Construction RWMP (AtkinsRéalis, 2025) submitted as part of this planning application. The plan should include but not be restricted to the mitigation measures below (Table 7.2).



In addition, all relevant mitigation measures stipulated within the SHD 2 application for this site area (ABP-314686-22) EIAR Chapter 15 – Schedule of Environmental Commitments (which is replicated for ease within Appendix A of this document) will apply throughout the construction phase, and must be incorporated within the Contractors CEMP.

**Table 7.2 –Waste Management Mitigation Measures**

Activity	Mitigation Measures
General	<p>An approved person, such as a site/contract/resource manager, will be given responsibility for good site practices and control, arrangements for collection and effective disposal to an appropriate facility, of all wastes generated at the site in accordance with EPA (2021) 'Best Practice Guidelines for the preparation of resources &amp; waste management plans for construction &amp; demolition projects'.</p> <p>Contractors will apply the waste prevention principles of the waste management hierarchy:</p> <ol style="list-style-type: none"> <li>1. Prevent – Do not generate the waste in the first place.</li> <li>2. Re-use – Can you re-use without treatment?</li> <li>3. Recycle – Make sure that wastes are properly segregated to aid recycling.</li> <li>4. Disposal with energy recovery</li> <li>5. Disposal without energy recovery</li> </ol> <p>The Contractor will ensure that all construction staff are trained in good waste management practice and chemical handling procedures.</p>
Collection and Storage of Waste	<p>Contractors will provide designated waste storage areas for the bulk storage of waste prior to removal off-site. A site plan showing the designated site will be provided to and approved by AtkinsRéalis.</p> <p>Only appropriately authorised contractors and sites will be used for the transport and disposal of waste.</p> <p>The Contractor will provide adequate facilities for the collection and storage of waste material including litterbins and waste skips.</p> <p>Waste containers/skips/bins will be provided with nets or lids to prevent waste being carried around by scavengers or by the wind.</p> <p>Waste containers will not be overfilled.</p> <p>Appropriate measures will be employed to minimise windblown litter and dust during transportation of waste by either covering trucks or by transporting wastes in enclosed containers.</p> <p>Industrial and construction waste including redundant hazardous equipment, tyres, used oil cans/drums etc. will be separated and put into segregated bins for removal and disposal by an appropriately authorised contractor.</p>
Waste Reduction and Sustainability	<p>Good management and control can prevent the generation of significant amounts of waste. Waste reduction is best achieved at the planning and design stage, as well as by ensuring the implementation of good site practices.</p> <p>Purchase materials in the quantity required for the project to minimise unused leftovers.</p> <p>Purchase materials that do not use excessive amounts of packaging to minimise the quantity of used packaging for subsequent disposal/processing.</p> <p>Segregate and store different types of waste in different containers, skips or stockpiles to enhance reuse or recycling of materials and their proper disposal.</p> <p>Collect and segregate waste metals including redundant plant and equipment, metal construction materials and cans.</p> <p>Recycle unused chemicals or those with remaining functional capacity.</p>
Disposal of Wastes	<p>All waste will be disposed of at approved sites using appropriately approved contractors - The Contractor must provide copies of valid EPA Waste licences and Local Authority Waste Permits (including those relating to their subcontractors or brokers, where applicable) for collection and waste treatment/disposal/export facilities.</p> <p>Records of waste disposal, recycling and recovery will be maintained.</p> <p>The contractor will provide sufficient secure waste disposal points and regular collection for disposal.</p> <p>No waste will be disposed of or buried on site.</p>



Activity	Mitigation Measures
	<p>Works that involve onsite filling with material other than virgin excavated natural material is encouraged where material is potentially suitable.</p> <p>Burning any waste on site is prohibited.</p> <p>Divert construction, demolition and land clearing debris from landfill disposal. Redirect recyclable recovered resources back to manufacturing process. Redirect reusable materials to appropriate sites.</p> <p>Waste will be segregated in an onsite recycling center and those components that are recyclable sent to appropriate facilities.</p> <p>Consider recycling cardboard, metal, brick, acoustic tile, concrete, plastic, clean wood, glass, gypsum wallboard, carpet and insulation.</p> <p>Identify approved haulers and recyclers to handle the designated materials.</p> <p>All non-recyclable waste will be disposed of by an appropriately authorised waste contractor.</p> <p>The contractor will follow approved procedures for the classification, sampling, transport and disposal of hazardous waste.</p>
Storage and Stocking of Material	<p>Temporary stockpiling of native soils and imported materials onsite will require careful management in order to prevent the release of sediment into receiving watercourses and any temporarily exposed groundwater (in the event that groundwater is encountered).</p> <p>Stockpiled materials will not be located immediately adjacent to watercourse (Rathmichael stream and River Dargle), or any temporarily exposed groundwater (in the event that groundwater is encountered).</p> <p>Stockpiled materials will be covered as required to prevent it spilling over/blowing onto areas of environmental interest or semi-natural vegetation outside the agreed lands.</p> <p>Stockpile of materials will be kept to an absolute minimum, and where possible, stockpiled for as short a time as possible prior to use.</p> <p>Any stockpiled materials will be stored in low mounds where possible.</p> <p>Slopes of material will be stable, and the side slopes compacted down and stabilised, with regular checks by the Contractor.</p> <p>The Contractor will examine the risk arising from storage areas and identify as appropriate the need for mitigation measures at the toe of slopes to reduce silt transport from areas of stockpiled material.</p> <p>Stockpiles of materials not suitable for onsite re-use will be removed as soon as is practicable in accordance with applicable waste management legislation.</p> <p>The Contractor will comply with best practice when sourcing imported materials for site works, including NRA (2006) A Guide to Landscape Treatments.</p> <p>Imported material will be from a reputable source who can confirm that it has been screened for potential presence of invasive species.</p>

## 7.2 Air Quality, Greenhouse Gas and Odour

Construction activities have the potential to impact on air quality through the creation of dust and emissions to air from vehicles and plant, along with activities including infilling of soil, excavation of trenches, stockpiling and movement of materials may all contribute to generating ambient dust. This section identifies the potential causes of air pollution which may arise from construction and provides guidance on the management and control of emissions from site.

### 7.2.1 Risk Identification

Contractors shall undertake a qualitative risk assessment or appraisal prior to the commencement of construction activities. An example risk assessment is shown in Table 7.3.

**Table 7.3 – Example of Air Quality Risk Assessment**

Risk Assessment	Example Procedure
01	Identify the location of all sensitive receptors within or adjacent to the construction site.
	Mark a site plan with the location of all adjacent housing/commercial centres, schools and educational establishments, agricultural land and other potential receptors. This will help the planning of the overall layout of the construction site and enable the identification of suitable sites for high-risk activities such as material storage areas, refuelling points and haul routes.
02	Identify the construction activities and sources of pollution that may result in emissions to air.
	These could include excavations, concrete use, transport, materials storage, traffic management etc.
03	Evaluate the risk of the construction activities resulting in emissions to air.
	Assess the likelihood of an activity causing pollution. Assess the significance of the harm pollution would cause to a particular receptor. For example, the impact of dust in a populated urban area would be significantly greater than dust in an unpopulated rural area.
04	Implement mitigation to eliminate or reduce risks.
	Use the following hierarchy to manage the risk: <ol style="list-style-type: none"> <li>1. Remove the risk (different construction methods/activities).</li> <li>2. Control the source (modify construction methods, covers for storage areas).</li> <li>3. Protect the receptor (provide hard standing and covering for compounds/storage areas, filter, control, contain emissions, ensure appropriate environmental permits are in place).</li> <li>4. Put emergency procedures in place.</li> </ol>

## 7.2.2 Air Quality & Greenhouse Gas Management Plan

Contractors should develop, implement and maintain an Air Quality Management Plan. The plan should include but not be restricted to the mitigation measures below (Table 7.4).

**In addition, all relevant mitigation measures stipulated within the SHD 2 application for this site area (ABP-314686-22) EIAR Chapter 15 – Schedule of Environmental Commitments of Volume 2- the Main EIAR (which is replicated for ease within Appendix A of this document) will apply throughout the construction phase, and must be incorporated within the Contractors CEMP.**

**Table 7.4 –Air Quality Mitigation Measures**

Activity	Mitigation Measures
General	The Contractor is required to implement the standard mitigation. Standard measures should be taken which will minimise dust from demolition and construction activities, at a minimum adhering to standard good practice which includes the Building Research Establishment (BRE) document entitled 'Control of Dust from Construction and Demolition Activities'.
Dust Suppression and Odour Management	Minimise use of internal site roads to limit the ground area that is disturbed. Avoid excessive vehicular traffic and movement. Locate haul routes away from sensitive receptors. Pave heavily used areas. Plan vehicle movements to minimise duration of dust generation. Stockpiles of fine material such as sand, topsoil material, cement, excavated material etc. will be covered / protected from wind.



Activity	Mitigation Measures
	<p>Use dust suppression systems such as a rotary water atomizer (or equivalent) to damp down stock piles and construction roads etc. during dusty conditions and to control dust from site-based activities. Due consideration should be given to use of appropriate water resources for use in dust suppression, see Section 7.5.</p> <p>Dust generating activities will cease during excessively windy periods.</p> <p>Construct dust screens/wind breaks as necessary.</p> <p>Fence off work areas with geotextile type liners.</p> <p>Encourage progressive rehabilitation of disturbed land or stockpiles by establishing temporary or permanent vegetation.</p> <p>Contractors will regularly inspect stockpiles; exposed work areas and construction works practices to ensure compliance.</p> <p>Vehicle speeds will be restricted on un-surfaced roads and tracks to less than 30km/hr to minimise dust.</p> <p>Cover and/or maintain appropriate freeboard (+ 0.3m) on trucks hauling any loose material that could produce dust when travelling.</p>
Traffic, Vehicle, Plant and Equipment Emissions	<p>Produce, implement, and maintain a comprehensive Traffic Management Plan (TMP).</p> <p>Undertake regular construction vehicle, plant, and equipment maintenance.</p> <p>Undertake regular maintenance on particulate traps/filters on trucks.</p> <p>Implement minimum exhaust requirements in line with national standards on equipment (including temporary power generators) and vehicles.</p> <p>Switch plant and vehicles off when not in use.</p> <p>Use public/shared transportation for workers.</p>
Other emissions	<p>No fires will be allowed on the construction site.</p> <p>Burning of waste materials on site will be prohibited.</p> <p>Limit volatile substance emissions/fine particle releases.</p> <p>Local sourcing of construction materials such as the recycling of material won on excavations for reuse on site.</p> <p>Reducing the idle times by providing an efficient material handling plan that minimises the waiting time for loads and unloads. Reducing idle times could save up to 10% of total emissions during construction phase.</p> <p>Turning off engines when not in use for more than five minutes. This restriction will be enforced strictly unless the idle function is necessary for security or functionality reasons; and,</p> <p>Regular maintenance of plant and equipment, and technical inspection of vehicles to ensure they will perform the most efficiently.</p>
Ozone Depleting Substances	<p>Ozone depleting substances will not be used on site.</p> <p>Fire protection products, refrigerants, coolants, degreasing agent should be based on non-ozone depleting alternatives.</p> <p>Any refrigerants used will be limited to R134a type (non-ozone depleting).</p>
Indoor Air Quality (IAQ)	<p>Adopt an IAQ management plan for the construction if appropriate:</p> <ul style="list-style-type: none"> <li>▪ Specify low-VOC materials during construction.</li> <li>▪ Specify low-VOC paints and coatings in construction documents.</li> <li>▪ Composite wood, agri-fiber products and laminating adhesives used on the interior of the building (defined as inside of the weatherproofing system) shall contain no added urea-formaldehyde resins.</li> </ul>
EIAR Chapter 15 – Schedule of Environmental Commitments of Volume 2 the 2022	<p>In summary the measures which shall be implemented include:</p> <p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>▪ Hard surface roads will be swept to remove mud and aggregate materials from their surface while any un-surfaced roads will be restricted to essential site traffic;</li> </ul>



Activity	Mitigation Measures
<p>EIAR (ABP-314686-22) (which is replicated for ease within Appendix A)</p>	<ul style="list-style-type: none"> <li>▪ Any road that has the potential to give rise to fugitive dust must be regularly watered, as appropriate, during dry and/or windy conditions;</li> <li>▪ Vehicles exiting the site shall make use of a wheel wash facility where appropriate, prior to entering onto public roads;</li> <li>▪ Vehicles using site roads will have their speed restricted, and this speed restriction must be enforced rigidly. On any un-surfaced site road, this will be 20 kph, and on hard surfaced roads as site management dictates;</li> <li>▪ Public roads outside the site will be regularly inspected for cleanliness and cleaned as necessary;</li> <li>▪ Material handling systems and site stockpiling of materials will be designed and laid out to minimise exposure to wind. Water misting or sprays will be used as required if particularly dusty activities are necessary during dry or windy periods; and,</li> <li>▪ During movement of materials both on and off-site, trucks will be stringently covered with tarpaulin at all times. Before entrance onto public roads, trucks will be adequately inspected to ensure no potential for dust emissions.</li> </ul> <p>At all times, these procedures will be strictly monitored and assessed. In the event of dust nuisance occurring outside the site boundary, movements of materials likely to raise dust would be curtailed and satisfactory procedures implemented to rectify the problem before the resumption of construction operations.</p> <p><b>Climate</b></p> <p>Construction stage traffic and embodied energy of construction materials are expected to be the dominant source of greenhouse gas emissions as a result of the construction phase of the proposed development. Construction vehicles, generators etc., may give rise to some CO<sub>2</sub> and N<sub>2</sub>O emissions. However, due to short-term nature of these works, the impact on climate will not be significant. Nevertheless, below are some Site-specific mitigation measures can be implemented during the construction phase of the proposed development to ensure emissions are reduced further;</p> <ul style="list-style-type: none"> <li>▪ The prevention of on-site or delivery vehicles from leaving engines idling (even over short periods),</li> <li>▪ Minimising waste of materials due to poor timing or over ordering on site (to minimise the embodied carbon footprint of the site).</li> </ul> <p>Monitoring of construction dust deposition along the site boundary to nearby sensitive receptors during the construction phase of the proposed development is recommended to ensure mitigation measures are working satisfactorily. This can be carried out using the Bergerhoff method in accordance with the requirements of the German Standard VDI 2119. The Bergerhoff Gauge consists of a collecting vessel and a stand with a protecting gauge. The collecting vessel is secured to the stand with the opening of the collecting vessel located approximately 2m above ground level. The TA Luft limit value is 350 mg/(m<sup>2</sup>*day) during the monitoring period between 28 - 32 days.</p> <p>Refer also to the relevant mitigation measures in Chapter 15 – Schedule of Environmental Commitments of Volume 2- the Main EIAR (ABP-314686-22) (which is replicated for ease within Appendix A of this document). All relevant mitigation measures within the EIAR in relation to the construction and operational phases must be fully implemented.</p> <p>The following dust mitigation measures shall be implemented during the construction phase of the proposed development. These measures are appropriate for sites with a high risk of dust impacts and aim to ensure that no significant nuisance occurs at nearby sensitive receptors. The mitigation measures draw on best practice guidance from Ireland (DLRCC, 2022; DCC, 2018),</p>

Activity	Mitigation Measures
	<p>the UK (IAQM (2024), BRE (2003), The Scottish Office (1996), UK ODPM (2002)) and the USA (USEPA, 1997). These measures will be incorporated into the overall Construction Environmental Management Plan (CEMP) prepared for the site. The measures are divided into different categories for different activities.</p> <p><u>Communications</u></p> <ul style="list-style-type: none"> <li>▪ Develop and implement a stakeholder communications plan that includes community engagement before works commence on site. Community engagement includes explaining the nature and duration of the works to local residents and businesses.</li> <li>▪ The name and contact details of a person to contact regarding air quality and dust issues shall be displayed on the site boundary, this notice board should also include head/regional office contact details.</li> </ul> <p><u>Site Management</u></p> <ul style="list-style-type: none"> <li>▪ During working hours, dust control methods will be monitored as appropriate, depending on the prevailing meteorological conditions. Dry and windy conditions are favourable to dust suspension therefore mitigations must be implemented if undertaking dust generating activities during these weather conditions.</li> <li>▪ A complaints register will be kept on site detailing all telephone calls and letters of complaint received in connection with dust nuisance or air quality concerns, together with details of any remedial actions carried out.</li> </ul> <p><u>Preparing and Maintaining the Site</u></p> <ul style="list-style-type: none"> <li>▪ Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible.</li> <li>▪ Erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site.</li> <li>▪ Avoid site runoff of water or mud.</li> <li>▪ Keep site fencing, barriers and scaffolding clean using wet methods.</li> <li>▪ Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site cover as described below.</li> <li>▪ Cover, seed or fence stockpiles to prevent wind whipping.</li> <li>▪ Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period.</li> </ul> <p><u>Operating Vehicles / Machinery and Sustainable Travel</u></p> <ul style="list-style-type: none"> <li>▪ Ensure all vehicles switch off engines when stationary - no idling vehicles.</li> <li>▪ Avoid the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where practicable.</li> <li>▪ Impose and signpost a maximum-speed-limit of 15 kph haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate).</li> <li>▪ Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials.</li> <li>▪ Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing)</li> </ul> <p><u>Operations</u></p>



Activity	Mitigation Measures
	<ul style="list-style-type: none"> <li>▪ Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems.</li> <li>▪ Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate.</li> <li>▪ Use enclosed chutes and conveyors and covered skips.</li> <li>▪ Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.</li> <li>▪ Ensure equipment is readily available on site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.</li> </ul> <p><u>Waste Management</u></p> <ul style="list-style-type: none"> <li>▪ Avoid bonfires and burning of waste materials.</li> </ul> <p><u>Measures Specific to Demolition</u></p> <ul style="list-style-type: none"> <li>▪ Prior to demolition blocks should be soft striped inside buildings (retaining walls and windows in the rest of the building where possible, to provide a screen against dust).</li> <li>▪ During the demolition process, water suppression should be used, preferably with a hand-held spray. Only the use of cutting, grinding or sawing equipment fitted or used in conjunction with a suitable dust suppression technique such as water sprays/local extraction should be used.</li> <li>▪ Drop heights from conveyors, loading shovels, hoppers and other loading equipment should be minimised, if necessary fine water sprays should be employed.</li> <li>▪ Avoid explosive blasting, using appropriate manual or mechanical alternatives.</li> </ul> <p><u>Measures Specific to Earthworks</u></p> <ul style="list-style-type: none"> <li>▪ Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable.</li> <li>▪ Use Hessian, mulches or trackifiers where it is not possible to re-vegetate or cover with topsoil, as soon as practicable.</li> <li>▪ Only remove the cover in small areas during work and not all at once.</li> <li>▪ During dry and windy periods, and when there is a likelihood of dust nuisance, a bowser will operate to ensure moisture content is high enough to increase the stability of the soil and thus suppress dust.</li> </ul> <p><u>Measures Specific to Construction</u></p> <ul style="list-style-type: none"> <li>▪ Ensure sand and other aggregates are stored in banded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.</li> <li>▪ Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery.</li> <li>▪ For smaller supplies of fine power materials ensure bags are sealed after use and stored appropriately to prevent dust.</li> </ul> <p><u>Measures Specific to Trackout</u></p> <ul style="list-style-type: none"> <li>▪ A speed restriction of 15 kph will be applied as an effective control measure for dust for on-site vehicles.</li> <li>▪ Avoid dry sweeping of large areas.</li> <li>▪ Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.</li> </ul>



Activity	Mitigation Measures
	<ul style="list-style-type: none"> <li>▪ Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.</li> <li>▪ Record all inspections of haul routes and any subsequent action in a site log book.</li> <li>▪ Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned.</li> <li>▪ Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).</li> <li>▪ Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits.</li> <li>▪ Access gates to be located at least 10 m from receptors where possible.</li> </ul> <p><u>Monitoring</u></p> <ul style="list-style-type: none"> <li>▪ Undertake daily on-site and off-site inspections, where receptors (including roads) are nearby, to monitor dust, record inspection results in the site inspection log. This should include regular dust soiling checks of surfaces such as street furniture, cars and windowsills within 100 m of site boundary, with cleaning to be provided if necessary.</li> <li>▪ Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.</li> </ul> <p>No site-specific mitigation measures are proposed for the operational phase as impacts are predicted to be not significant.</p> <p><u>Monitoring Requirements</u></p> <ul style="list-style-type: none"> <li>▪ Monitoring of construction dust deposition along the site boundary to nearby sensitive receptors during the construction phase of the proposed development is recommended to ensure mitigation measures are working satisfactorily. This can be carried out using the Bergerhoff method in accordance with the requirements of the German Standard VDI 2119. The Bergerhoff Gauge consists of a collecting vessel and a stand with a protecting gauge. The collecting vessel is secured to the stand with the opening of the collecting vessel located approximately 2m above ground level. The TA Luft limit value is 350 mg/m<sup>2</sup>/day during the monitoring period of 30 days (+/- 2 days). There is no monitoring recommended for the operational phase of the development as impacts to air quality are predicted to be not significant.</li> </ul>

## 7.3 Construction Noise and Vibration

Construction activities can produce a significant amount of noise and vibration with the potential to impact adversely on a range of receptors. This section identifies the potential causes of noise and vibration which may arise from construction and provides guidance on management and control.

### 7.3.1 Risk Identification

An example risk assessment is shown in Table 7.5.

**Table 7.5 – Example of Noise and Vibration Risk Assessment**

	Risk Assessment	Example Procedure
01	Identify the location of all sensitive receptors within or adjacent to the construction site.	<p>Mark up on a site plan the location of all nursing homes, housing/commercial centers, schools and educational establishments, agricultural land and other potential receptors.</p> <p>This will help the planning of the overall layout of the construction site and enable the identification of suitable sites for noisy activities or activities likely to cause vibration such as generators, compressors, haul routes and drilling.</p>
03	Identify the construction activities that may affect the receptors identified.	These could include excavations, dewatering, traffic movements, warning sirens, use of machinery and plant etc.
04	Evaluate the risk of the construction activities impact on receptors.	<p>Assess the likelihood of an activity causing noise pollution.</p> <p>Assess the significance of the noise impact on particular receptors. For example, the impact of noise from construction activities adjacent to housing would be significantly greater than the impact of noise in an uninhabited rural area.</p>
05	Implement mitigation to eliminate or reduce risks.	<p>Use the following hierarchy to manage the risk:</p> <ol style="list-style-type: none"> <li>1. Remove the risk (different construction methods, substitution of materials for less noisy options).</li> <li>2. Control the source (modify construction methods, provide adequate baffling).</li> <li>3. Protect the receptor using noise barriers, screening etc.</li> <li>4. Put emergency procedures in place.</li> </ol>

## 7.3.2 Noise and Vibration Management Plan

Contractors should develop, implement and maintain a Noise and Vibration Management Plan. The Plan should include but not be restricted to the mitigation measures below (Table 7.6).

**In addition, all relevant mitigation measures stipulated within the SHD 2 application for this site area (ABP-314686-22) EIAR Chapter 15 – Schedule of Commitments of Volume 2- the Main EIAR (which is replicated for ease within Appendix A of this document) will apply throughout the construction phase, and must be incorporated within the Contractors CEMP.**

**Table 7.6 –Noise and Vibration Mitigation Measures**

Activity	Mitigation Measures
General	<p>The contractor shall comply with the contents and recommendations of BS 5228 – 1:2009 + A1:2014: Code of Practice for Noise and Vibration Control on Construction and Open Sites – Part 1: Noise &amp; Part 2: Vibration.</p> <p>The contractor shall also comply with the contents and recommendations of BS 6471:2008: Guide to Evaluation of Human Exposure to Vibration in Building, Part 1: Vibration Sources other than Blasting.</p> <p>The contractor shall ensure that each item of equipment complies with the noise limits quoted in the European Commission Directive 2000/14/EC.</p> <p>As far as practical construction methods that are likely to cause high levels of noise and vibration e.g. concrete and excavation work, will be restricted to day time hours only.</p> <p>Approval from the local authority should be obtained prior to undertaking work at night.</p> <p>Local residents and people likely to be affected by noise and vibration should be informed prior to the commencement of work.</p> <p>Access roads to the site will be positioned such that vehicular movements cause minimum disturbances to residential buildings (if possible).</p>

Activity	Mitigation Measures
	<p>Replace noisy plant with less noisy alternatives, shield/screen noise making plant especially during the evening and night periods or provide plant which is specifically designed with noise inhibitors such as generators and compressors with silencers and muffled jack-hammers.</p> <p>Construct a solid barrier around the generators.</p> <p>Use plant in accordance with manufacturer's specifications.</p> <p>Orientate machinery away from noise sensitive residential areas.</p> <p>Where machines are fitted with engine covers these shall be kept closed.</p> <p>Ensure all stationary and mobile equipment, construction plant, machinery and vehicles are well maintained on a regular basis, and in good working order.</p> <p>Delivery routes used by trucks and lorries should avoid residential areas to prevent likely vibration impacts from construction traffic to and from the site.</p> <p>Vibrations must be minimised at any neighbouring premises. Residents of neighbouring premises must be warned of possible vibrations prior to the commencing the activity.</p> <p>Complaints will be responded to within 24 hours and mitigation measures checked and improved within 48 hours.</p> <p>Should a substantiated noise complaint be received by the Contractor, an appropriate noise monitoring campaign shall be instigated by the Contractor to determine the noise source. If necessary, appropriate noise mitigation measures, such as noise barriers, will be implemented.</p>
<p>EIAR Chapter 15 – Schedule of Environmental Commitments of Volume 2- the 2022 EIAR (ABP-314686-22) (which is replicated for ease within Appendix A)</p>	<p>With regard to construction activities, best practice control measures from construction sites within BS 5228 (2009 +A1 2014) Code of Practice for Noise and Vibration Control on Construction and Open Sites Parts 1 and 2 will be used to control noise and vibration impacts. The implementation of all best practice noise and vibration control methods will ensure potential impacts to nearby residential noise sensitive locations are not significant. This will be particularly important during excavation and foundation construction which are likely to be the activities to have the highest potential noise and vibration impact.</p> <p>Noise-related mitigation methods are described below and will be implemented for the project in accordance with best practice. These methods include:</p> <ul style="list-style-type: none"> <li>▪ <i>No plant used on site will be permitted to cause an ongoing public nuisance due to noise;</i></li> <li>▪ <i>The best means practicable, including proper maintenance of plant, will be employed to minimise the noise produced by on site operations;</i></li> <li>▪ <i>All vehicles and mechanical plant will be fitted with effective exhaust silencers and maintained in good working order for the duration of the contract;</i></li> <li>▪ <i>Compressors will be attenuated models fitted with properly lined and sealed acoustic covers which will be kept closed whenever the machines are in use and all ancillary pneumatic tools shall be fitted with suitable silencers;</i></li> <li>▪ <i>Machinery that is used intermittently will be shut down or throttled back to a minimum during periods when not in use;</i></li> <li>▪ <i>During construction, the contractor will manage the works to comply with noise limits outlined in BS 5228-1:2009+A1 2014. Part 1 – Noise;</i></li> <li>▪ <i>All items of plant will be subject to regular maintenance. Such maintenance can prevent unnecessary increases in plant noise and can serve to prolong the effectiveness of noise control measures;</i></li> <li>▪ <i>Limiting the hours during which site activities which are likely to create high levels of noise or vibration are permitted; and,</i></li> <li>▪ <i>Monitoring levels of noise and vibration during critical periods and at sensitive locations (i.e. at the boundary between the development site and the school and residential buildings.</i></li> </ul>

Activity	Mitigation Measures
	<p>Furthermore, it is envisaged that a variety of practicable noise and vibration control measures will be employed. These will include:</p> <ul style="list-style-type: none"> <li>▪ <i>Selection of plant with low inherent potential for generation of noise and/ or vibration;</i></li> <li>▪ <i>Erection of good quality site hoarding to the site perimeters adjacent to sensitive receptors which will act as a noise barrier to general construction activity at ground level;</i></li> <li>▪ <i>Erection of barriers as necessary around items such as generators or high duty compressors, and;</i></li> <li>▪ <i>Situate any noisy plant as far away from sensitive properties as permitted by site constraints.</i></li> </ul> <p>There is a requirement to ensure that construction activities operate within the noise and vibration limits set out within this EIAR. There is also a requirement to undertake regular noise and vibration monitoring at locations representative of the closest sensitive locations to ensure the relevant criteria are not exceeded. Noise monitoring shall be conducted in accordance with the International Standard ISO 1996: 2017: Acoustics – Description, measurement and assessment of environmental noise. It will be a requirement of the appointed contractor to undertake such noise monitoring during the relevant phases of the construction program.</p> <p>Vibration monitoring shall be conducted in accordance with BS 6472 for human disturbance and BS ISO 4866:2010 for building damage. It will be a requirement of the appointed contractor to undertake such vibration monitoring during the relevant phases of the construction program.</p> <p>Refer also to relevant mitigation measures in Chapter 15 – Schedule of Environmental Commitments of Volume 2- the Main EIAR, 2022 (ABP-314686-22) (which is replicated for ease within Appendix A of this document). All relevant mitigation measures within the EIAR in relation to the construction and operational phases must be fully implemented.</p>
<p>Inward Noise Assessment (AWN Consulting, 2025)</p>	<p>An initial site noise risk assessment has been carried out for the proposed development of Block A Phase 1 at Sea Gardens, Bray. The proposed development site is located along the adjacent rail network, hence an inward noise impact assessment has been undertaken in order to protect the future residents and ensure that internal and external noise levels are within the proposed guidance values. The site has been classified as having a medium noise risk using guidance contained in ProPG. This was determined through both noise surveying and modelling of the site. Discussion is presented in terms of the likely noise impact of internal areas of the proposed development. It will be necessary to provide enhanced performance acoustic glazing on the facades indicated within this report to ensure that when windows are closed that the internal noise environment is 'good' for occupants within the building. Once the specified glazing performance is employed the internal noise levels will be within the guidance values, and a 'good' internal noise level will be achieved. It is noted that some external balcony areas that look directly onto the rail network may experience slightly higher noise levels than those recommended within the guidance (calculated as an exceedance of 1 dB). The ProPG document does provide alternative measures to offset the impact of higher than desirable noise levels, one of these alternate measures is the provision of "a relatively quiet, protected, nearby, external amenity space for sole use by a limited group of residents as part of the amenity of their dwellings" or "a relatively quiet, protected, publicly accessible, external amenity space (e.g. a public park or a local green space designated because of its tranquillity) that is nearby (e.g. within a 5 minutes walking distance)". In this instance the block has a communal external area on the podium that has been modelled and is predicted to meet the external noise thresholds. Given the above, it is concluded that the proposed development site meets the guidance and criteria set out in the NAP, ProPG and BS8233.</p>

## 7.4 Prevention of Soil and Water Pollution

Construction activities have the potential to cause pollution to groundwater and/or soils and surface water. This section identifies the potential causes of pollution which may arise from construction and provides guidance on the management and control.

### 7.4.1 Risk Identification

Contractors shall undertake a qualitative pollution risk assessment or appraisal prior to the commencement of construction activities. An example risk assessment is presented in Table 7.7.

**Table 7.7 – Example of Soil and Water Pollution Risk Assessment**

Risk Assessment	Example Procedure
01	Identify the location of all sensitive receptors within or adjacent to the construction site.
	<p>Mark up on a site plan with the location of all water courses, surface water features, boreholes / wells, field drains, ecologically sensitive areas, surface and foul drainage systems and other potential receptors.</p> <p>This will help the planning of the overall layout of the construction site and enable the identification of suitable sites for high risk activities such as chemical/fuel storage areas, refuelling points, haul routes and wash out areas.</p>
02	Identify sensitive receptors off site or downstream of the construction project that could potentially be affected by the works. For example water courses, ecologically sensitive areas.
	Undertake baseline assessment of water ground and surface water quality prior to construction. Establish monitoring regime during construction as appropriate.
03	Identify the construction activities and sources of pollution that may affect the water receptors identified.
	These could include excavations, dewatering, water course crossings, as well as general sources of pollution such as surface water runoff, chemical/fuel storage, wash down areas, fuelling areas and concrete use.
04	Evaluate the risk of the construction activities polluting the identified water receptors.
	<p>Assess the likelihood of an activity causing pollution.</p> <p>Assess the significance of the harm pollution would cause to a particular water receptor. For example the impact of polluting a water receptor used for potable water would be significantly greater than the pollution of a foul water system.</p>
05	Implement mitigation to eliminate or reduce risks.
	<p>Use the following hierarchy to manage the risk:</p> <ol style="list-style-type: none"> <li>1. Remove the risk (different construction methods/activities).</li> <li>2. Control the source (change location, modify construction methods, provide adequate bunding for fuel and other storage areas, install measures such as silt fences or ditches to control runoff).</li> <li>3. Protect the receptor (provide hard standing for compounds/storage areas, filter, control, contain discharges, ensure appropriate environmental permits are in place).</li> <li>4. Put emergency procedures in place.</li> </ol>
06	EIAR - ABP-314686-22 (AtkinsRéalis, 2022)
	Refer also to relevant mitigation measures in Chapter 15 – Schedule of Environmental Commitments of Volume 2- the Main EIAR (ABP-314686-22) (which is replicated for ease within Appendix A of this document). All relevant mitigation measures within the EIAR in relation to the construction and operational phases must be fully implemented.

## 7.4.2 Pollution Prevention Management Plan

Contractors should develop, implement and maintain a Pollution Prevention Management Plan. The Plan should include but not be restricted to the mitigation measures below (Table 7.8).

**In addition, all relevant mitigation measures stipulated within the SHD 2 application for this site area (ABP-314686-22) EIAR Chapter 15 – Schedule of Environmental Commitments of Volume 2- the Main EIAR (which is replicated for ease within Appendix A of this document) will apply throughout the construction phase, and must be incorporated within the Contractors CEMP.**

**Table 7.8 –Soil and Water Mitigation Measures**

Activity	Mitigation Measures
General	<p>Ensure that appropriate permits/consents are in place prior to commencing dewatering activities.</p> <p>Sample collections as required, such as for wastewaters and discharges to the ground and surface waters to facilitate characterisation of contaminants in the event of a leakage or spill that may impact soil or groundwater quality.</p> <p>Appropriate sampling of discharges, to include key parameters to ensure discharges meet appropriate criteria.</p> <p>Carry out regular inspections/audits of hazardous materials usage, handling and storage areas and regular/thorough maintenance of vehicles and hydraulic systems and sanitary/welfare facilities.</p> <p>Avoid impacting adjacent sites by ensuring all contractors activities, equipment and waste storage is confined to the approved site boundary.</p> <p>Where waste waters do not meet approve quality criteria they should be contained and disposed of via an approved disposal route.</p> <p>Ensure regular and controlled disposal of waste using appropriately authorised contractors.</p>
Storage and handling of hazardous substances	<p>Hazardous substances include, but are not limited to: human excrement, fuel, lubrication oils, hydraulic and brake fluid, acids, paints, anti-corrosives, pesticides, detergents, cement etc. All hazardous material, including chemicals and fuels, will be stored at a designated site.</p> <p>Contractors should minimise the amount of diesel, oil, paint, thinners and other chemicals stored on site that pose potential spillage environmental hazards and use materials that minimise environmental impact such as lead free paints, asbestos free materials etc.</p> <p>Contractors will keep a list of all hazardous substances present on site and the MSDS for these substances shall be readily available.</p> <p>Hazardous wastes are the by-products and wastes associated with the use of hazardous substances as well as potentially hazardous items such as spent batteries, used oil filters, light bulbs, circuit boards, sharp objects etc. which require special collection and handling.</p> <p>Each receptacle containing dangerous goods will be marked with the correct technical name of the substance it contains. All markings shall be legible and in appropriate language.</p> <p>Incompatible materials will not be placed in common containment.</p> <p>All refuelling and fuel drum loading operations will take place at a designated site and the ground under the refuelling and fuel drum loading areas will be protected against pollution caused by spills and/or tank overfills.</p> <p>Fill nozzles will be kept within the bunded area when not in use and padlocked.</p> <p>Collection systems will be provided/bunded if necessary under machinery or equipment that may leak hydrocarbons/hazardous substances. Bunds should typically be provided at refuelling stations, under any container with hazardous substances (oil, fuel, paints, solvents etc.) or any piece of machinery (i.e. generators) which may leak fuel, lubricants or hydraulic fluids. It is good practice to provide drip trays under construction vehicles prone to leaking lubricants/and oil.</p> <p>Locate storage areas away from drains/trenches/wastewater collection devices. All hazardous liquids will be stored in an impervious bund area where the volume of the storage bund is &gt;110% of the largest storage tank contained within the bund until collected for off-site disposal by an approved waste contractor at an approved site.</p> <p>All flammable liquids will be stored under cover and in well ventilated areas. No electrical equipment will be used within 10 metres of the storage area.</p>

Activity	Mitigation Measures
	<p>Cylinders of compressed gas or flammable gases will be stored upright in secure racks and out of direct sunlight or heat source.</p> <p>The contractor will ensure that there is adequate fire-fighting equipment at the fuel and hazardous materials storage area.</p> <p>Fire fighting equipment should be well maintained and tested periodically in line with manufacturers recommendations.</p> <p>All contractors handling hazardous materials will keep appropriate spill cleanup material/spill kits adjacent to storage and maintenance areas and take immediate action to contain/clean up the spill using sand/suitable absorbent material. Contaminated soil, rags and other clean up material will be disposed of via an approved waste contractor at an approved site.</p> <p>Spill kits will be inspected on a regular basis.</p> <p>Used or waste fuel or other waste chemicals will be stored in a bunded area until collected for off-site disposal by an approved waste contractor at an approved site.</p> <p>Waste material or water containing waste chemicals such as thinners, oil, and mineral spirits will not be pumped or disposed of into storm water drains, sanitary sewers or into the ground.</p> <p>The contractor will comply with all permit conditions, environmental regulations and legislation with regards to the safe storage and handling of hazardous substances.</p> <p>The contractor is responsible for the training of all personnel on site who will be handling hazardous materials about its proper use, handling, disposal and spills procedures and to provide all staff with appropriate personal protective equipment.</p>
<p>Maintenance and wash down of vehicles and machinery</p>	<p>Ensure all equipment is well maintained and in good working order.</p> <p>A collection system shall be provided (i.e. trays or impervious linings) under machinery or equipment that may leak hydrocarbons/hazardous substances (e.g. generator and pumps).</p> <p>All routine truck and plant maintenance to be carried out off site at contractor depot.</p> <p>Vehicle/machinery repair whether minor or major on open ground or at the side of roads is forbidden. Emergency repairs, mechanical servicing and maintenance of Vehicles/equipment/site plant to be undertaken at designated workshop area designed to contain any spillage.</p> <p>Oil or lubricants only to be changed at designated workshops.</p> <p>The ground under the servicing areas shall be constructed of an impervious material and bunded as necessary.</p> <p>It is prohibited to allow wash water to cause pollution of the ground, surface water or ground water. Vehicle and equipment wash down shall only be undertaken at designated areas. The ground under the wash down area shall be impervious and designed to collect wash water. Install oil interceptors and silt traps where wastewater may be contaminated. Wash water will be re-used where possible (such as vehicle washing, dust suppression) and excess water collected and disposed of by an approved contractor to an approved site.</p>
<p>Sanitary facilities</p>	<p>Adequate sanitary facilities including restrooms, showers, water tanks, cold drinking water facilities and sewage waste collection facilities will be provided as appropriate. The siting of the facilities will be agreed with Uisce Éireann (UÉ).</p> <p>Holding tanks will be fitted with overflow alarms and will be emptied on a regular basis at a frequency which ensures no overflow of sewage effluent by an approved waste disposal company to an approved site.</p> <p>It is prohibited to discharge sewage onto the open ground.</p> <p>It is prohibited to use open ground for sanitary purposes including bathing, defecating, urination, cooking, washing (dishes or clothing).</p> <p>Disposal of settled solids in accordance with permit conditions. Sludge will also be disposed of on a regular basis in accordance with regulations.</p> <p>Confirmation of underground infrastructure such as sewage lines will be obtained prior to excavation.</p>
<p>Dewatering discharges</p>	<p>All dewatering activities will be agreed in advance with the EPA/ Dún Laoghaire-Rathdown County Council.</p> <p>Prepare a Dewatering Management Plan (if required).</p> <p>Collect/submit representative dewatering discharge samples for laboratory analyses at prescribed intervals as required by the EPA/ Dún Laoghaire-Rathdown County Council.</p>

Activity	Mitigation Measures
	<p>Conduct visual inspections at the time of sample collection.</p> <p>Treat all discharges to remove sediments using filtration/settling tank.</p> <p>The contractor will not discharge contaminated or potentially contaminated water to ground.</p> <p>The contractor will only use water of an appropriate quality for dust suppression, contaminated or potentially contaminated water will not be used.</p> <p>Where waste waters do not meet approved quality criteria they should be contained and disposed of via an approved disposal route.</p> <p>Determine most appropriate disposal option – onsite/offsite recycling/aquifer recharges etc.</p> <p>The contractor will undertake regular leak monitoring during dewatering.</p>
<p>EIAR Chapter 15 – Schedule of Environmental Commitments of Volume 2- the 2022 EIAR (ABP-314686-22) (which is replicated for ease within Appendix A)</p>	<p>With regard to groundwater and surface water quality impacts the following mitigation measures are proposed. The Contractor will be responsible for ensuring these measures are fully implemented:</p> <ul style="list-style-type: none"> <li>▪ In advance of commencement of the Construction Stage, all onsite monitoring wells will be fully decommissioned by an experienced borehole specialist in accordance with relevant guidelines, ‘Good practice for decommissioning redundant boreholes and wells’ (UK Environment Agency, 2012; SEPA, 2003);</li> <li>▪ An Outline Construction ‘Surface Water Management Plan’ will be prepared by the Contractor. The plan will set out clear guidelines and mitigation measures to ensure that surface water quality and quantity is managed throughout the construction stage to prevent impacts on the River Dargle. This should include details on project phasing.</li> <li>▪ The construction management of the Site will take account of the recommendations of the Construction Industry Research and Information Association (CIRIA) guidelines C750 (2016) ‘Control of Water Pollution from Construction Sites’ and ‘Groundwater control - design and practice’ and C811 (2023) ‘Environmental Good Practice on Site’ to minimise as far as possible the risk of pollution.</li> <li>▪ Any groundwater temporarily dewatered during the excavation works for the proposed attenuation tanks, services and utilities, and roadways, and during piling (as required), will be treated via. the installation of a temporary in-situ water treatment system; <ul style="list-style-type: none"> <li>▫ This system should be designed and sized to ensure that all pumped groundwater water is treated via. a temporary attenuation pond, prior to discharge to a selected onsite location (via. a temporary soakaway).</li> <li>▫ The Contractor will be required to provide a Site-specific dewatering plan, clearly setting out proposed excavation methodology, estimated dewatering rates, details of proposed treatment system, and discharge location.</li> </ul> </li> <li>▪ The Contractor will be responsible for ensuring that the existing drainage network, specifically along the existing road, and as required elsewhere across the site, will be suitably protected (via. the use of physical barriers and / or the implementation a Site-specific water run-off management plan as required).</li> <li>▪ In order to prevent any potential surface water / groundwater impacts via. release of hydrocarbon / chemical contaminants the following standard measures will be implemented: <ul style="list-style-type: none"> <li>▫ Fuels, lubricants and hydraulic fluids for equipment used on the construction Site, as well as any solvents, oils, and paints will be carefully handled to avoid spillage, properly secured against unauthorised access or vandalism, and provided with spill containment according to best codes of practice;</li> <li>▫ Waste oils and hydraulic fluids will be collected in leak-proof containers and removed from the proposed development for disposal or re-cycling;</li> </ul> </li> <li>▪ A response procedure will be put in place to deal with any accidental pollution events. Any spillage of fuels, lubricants or hydraulic oils will be immediately contained and the contaminated soil removed from the proposed development and properly disposed of in accordance with all relevant waste management legislation;</li> </ul>



Activity	Mitigation Measures
	<ul style="list-style-type: none"> <li>▫ All Site vehicles used will be refuelled in bunded and adequately sealed and covered areas in the construction compound area.</li> <li>▫ Strict supervision of contractors will be adhered to in order to ensure that all plant and equipment utilised on-Site is in good working condition. Any equipment not meeting the required standard will not be permitted for use within the Site. This will minimise the risk of groundwater becoming contaminated through Site activity.</li> <li>▫ All oil stored on Site for construction vehicles will be kept in a locked and bunded area;</li> <li>▫ Generators, pumps and similar plant will be placed on drip-trays to prevent contamination;</li> <li>▫ All Site vehicles used will be refuelled in bunded areas;</li> <li>▫ All temporary construction fuel tanks will also be located in a suitably bunded area and all tanks will be double skinned. Relevant Material Safety Data Sheets along with oil absorbent materials will be kept on Site in close proximity to any fuel storage tanks or bowsers during proposed Site development works; and,</li> <li>▫ All fuel / oil deliveries to on-Site oil storage tanks will be supervised, and records will be kept of delivery dates and volumes.</li> </ul> <ul style="list-style-type: none"> <li>▪ In order to prevent any potential surface water / groundwater impacts via. release of cementitious materials the following measures will be implemented where poured concrete is being used on Site; <ul style="list-style-type: none"> <li>▫ The production, transport and placement of all cementitious materials will be strictly planned and supervised. Site batching/production of concrete will not be carried out on Site and therefore these aspects will not pose a risk to the waterbodies present, namely any temporarily exposed groundwater, the River Dargle or the Irish Sea;</li> <li>▫ Shutters will be designed to prevent failure. Grout loss will be prevented from shuttered pours by ensuring that all joints between panels achieve a close fit or that they are sealed;</li> <li>▫ Any spillages will be cleaned up and disposed of correctly;</li> <li>▫ Where concrete is to be placed by means of a skip, the opening gate of the delivery chute will be securely fastened to prevent accidental opening;</li> <li>▫ Where possible, concrete skips, pumps and machine buckets will be prevented from slewing over water when placing concrete;</li> <li>▫ Mixer washings and excess concrete will not be discharged directly into the drainage network, or any drainage ditches, surface water bodies or exposed groundwater; and,</li> <li>▫ Surplus concrete will be returned to batch plant after completion of a pour.</li> </ul> </li> <li>▪ Foul drainage from Site offices and Site compounds will be directed to the existing wastewater network or will be contained and disposed of off-site in an appropriate manner and in accordance with the relevant statutory regulations.</li> </ul> <p>The above mitigation measures will form part of the Outline Construction Environmental Management Plan (CEMP) submitted as part of this planning application, and which will be further developed by the Contractor within the project-specific Detailed CEMP which will be in operation during the construction phase.</p> <p>Refer also to the relevant mitigation measures in Chapter 15 – Schedule of Commitments of Volume 2- the Main EIAR, 2022 (which is replicated for ease within Appendix A of this document). All relevant mitigation measures within the EIAR in relation to the construction and operational phases must be fully implemented.</p>

## 7.5 Water Resources and Energy Use

Construction activities have the potential to use significant volumes of water and energy. This section identifies the potential impacts associated with water and energy use which may arise from construction and provides guidance on the management and control of water and energy on site.

### 7.5.1 Risk Identification

Contractors shall undertake a qualitative water resources and energy use assessment or appraisal prior to the commencement of construction activities. An example risk assessment is shown in Table 7.9.

**Table 7.9 – Example of Water Resources and Energy Use Risk Assessment**

	Risk Assessment	Example Procedure
01	Identify all items and activities on the construction site with high water and/or energy demands.	Mark up on a site plan with the location of all items and activities with high water and/or energy demands.  This will help the planning of the overall layout of the construction site and enable the identification of efficiency opportunities.
02	Implement mitigation to eliminate or reduce water and/or energy demand.	Use the following hierarchy promote water and energy efficiency:  1. Remove the requirement (different construction methods, substitution of materials for that require less water and/or energy).  2. Control the use (modify construction methods, monitoring, target setting, procedures, switch off, training).

### 7.5.2 Water Resources and Energy Use Management Plan

Contractors should develop, implement and maintain a Water Resources and Energy Use Management Plan. The Plan should include but not be restricted to the mitigation measures below (Table 7.10).

**In addition, all relevant mitigation measures stipulated within the SHD 2 application for this site area (ABP-314686-22) EIAR Chapter 15 – Schedule of Environmental Commitments of Volume 2- the Main EIAR (which is replicated for ease within Appendix B of this document) will apply throughout the construction phase, and must be incorporated within the Contractors CEMP.**

**Table 7.10 –Water Resources and Energy Use Mitigation Measures**

Activity	Mitigation Measures
General	Reduce water consumption through recovery strategies. Conserve water by maximising opportunities for infiltration runoff. Conserve water by matching water quality with its intended use and using water saving devices. Contractors will carry out regular inspections/audits of water resource and energy use. In the event of excessive water use/leaking pipes etc, immediate action will be taken to repair equipment or reassess water needs. Use an irrigation system which utilises cooling water, condensate, TSE or other wastewater. Water arising from vehicle and equipment wash-down will be treated to remove silt and reused where possible. For example wetting down roads and stockpiles.

Activity	Mitigation Measures
	<p>Turn out the lights at night and only light areas as required for safety and comfort (employment of lighting sensors).</p> <p>Ensure that the light source is the minimum intensity for the required purpose.</p> <p>Ensure that fittings are chosen that direct light accurately to where it is needed.</p> <p>Vehicles will not be allowed to idle for long periods.</p> <p>Machinery and generators shall be regularly maintained and operated in an efficient manner.</p> <p>The use of solar powered instruments/machines should be considered.</p> <p>Temporary site offices should be well insulated to retain heat or cool, utilise energy efficient bulbs and energy efficient cooling systems.</p> <p>Choose locally sourced building materials and products thereby reducing the environmental impacts from transportation.</p> <p>Choose rapidly renewable materials over finite raw and long cycle renewable materials.</p> <p>Use timber and wood, including that used in construction, from a certified sustainable source, or be postconsumer re-used timber, or similar.</p>

## 7.6 Ecology – Natural Habitats, Flora and Fauna

Construction activities can have adverse impacts on natural habitats, flora and fauna. This section identifies potential adverse impacts which may arise from construction and provides guidance on management and control.

### 7.6.1 Risk Identification

Contractors shall undertake a qualitative ecology risk assessment or appraisal prior to the commencement of construction activities. An example risk assessment is shown in Table 7.11.

**Table 7.11 – Example of Ecology Risk Assessment**

Risk Assessment	Example Procedure
01 Identify the location of all sensitive ecological receptors within or adjacent to the construction site.	<p>Mark on the site plan the location of all water courses, surface water features, ecologically sensitive areas and habitats, other potential receptors including key wildlife populations. Particular attention should be paid to existing ecological features within the project area.</p> <p>This will help the planning of the overall layout of the construction site and enable the identification of suitable sites for high risk activities such as chemical/fuel storage areas, refuelling points, haul routes and wash out areas.</p>
02 Identify sensitive receptors off site or downstream of the construction project that could potentially be affected by the works. For example water courses, ecologically sensitive areas and habitats.	Undertake baseline assessment of water quality prior to construction. Establish monitoring regime during and post construction.
03 Identify the construction activities and sources of pollution that may affect the water/ecological receptors identified.	These could include excavations, dewatering, water course crossings, as well as general sources of pollution such as surface water runoff, fuel storage and concrete use.
04 Evaluate the risk of the construction activities polluting the identified receptors.	Assess the likelihood of an activity causing pollution, damage or harm.

Risk Assessment		Example Procedure
05	Implement mitigation to eliminate or reduce risks.	Use the following hierarchy to manage the risk: <ol style="list-style-type: none"> <li>1. Remove the risk (different construction methods/activities).</li> <li>2. Control the source (modify construction methods, provide adequate bunding for fuel and other storage areas, install measures such as silt fences or ditches to control runoff).</li> <li>3. Protect the receptor (provide hard standing for compounds/storage areas, filter, control, contain discharges, ensure appropriate environmental permits are in place).</li> <li>4. Put emergency procedures in place.</li> </ol>

## 7.6.2 Ecology Management Plan

Contractors should develop, implement and maintain an Ecology Management Plan. The Plan should include but not be restricted to the mitigation measures below (Table 7.12).

**In addition, all relevant mitigation measures stipulated within the SHD 2 application for this site area (ABP-314686-22) EIAR Chapter 15 – Schedule of Environmental Commitments of Volume 2- the Main EIAR (which is replicated for ease within Appendix B of this document) will apply throughout the construction phase, and must be incorporated within the Contractors CEMP.**

**Table 7.12 – Ecology Mitigation Measures**

Activity	Mitigation Measures
General	<p>Where practicable maintain areas of natural vegetation.</p> <p>Maintain good water quality as outlined in the Pollution Prevention Plan.</p> <p>No disposal of waste on site - adhere to the Waste Management Plan.</p> <p>Minimise the impact of erosion and sedimentation by the management strategies described in the Erosion and Sedimentation Management Plan.</p> <p>Wildlife awareness talk to staff if in /near to sensitive areas.</p> <p>Biodiversity Management will be implemented as part of the proposed landscaping around and within the site will consist of native species and pollinator-friendly planting, in accordance with the Irish Water's Biodiversity Action Plan – Spring 2021. All trees will be protected in accordance with BS: 5837:2012 Trees in relation to design, demolition and construction.</p> <p>Do not handle or kill any animal on the site.</p> <p>The following activities shall be prohibited:</p> <ul style="list-style-type: none"> <li>• Disposal or burial of waste on site.</li> <li>• Illegal dumping, including roadside dumping and illegal land filling.</li> <li>• Burning of waste on site.</li> </ul>
Outline Construction Surface Water Management Plan.	<p>Prior to construction, the appointed Contractor shall prepare an Outline Construction Surface Water Management Plan which will set out clear guidelines and mitigation measures to ensure that surface water quality and quantity is managed throughout the construction stage to prevent impacts on the River Dargle. This should include details on project phasing.</p> <p>A meeting must be arranged with Inland Fisheries Ireland (IFI) the Project Team and the Contractor and the outcome to be specified in the Construction Surface Water Management Plan.</p>
SuDS Preliminary Maintenance and Management Plan	<p>A SuDS Preliminary Maintenance and Management Plan for the adopted SuDS measure shall be prepared by the appointed Contractor. The plan should include the maintenance of the proposed fuel/oil separator and agreed SuDS measures</p>

Activity	Mitigation Measures
Landscape (BSLA, 2025) Report	<p>A tree/vegetation removal drawing submitted was submitted with planning ref ABP-311181-21. Existing trees will be retained along the northern and eastern boundaries to maintain these existing site features and provide a clearly defined boundary to this portion of the site. Trees that are felled to facilitate the development will be compensated for by extensive tree planting throughout the proposed development, the creation of biodiversity corridors along the northern, eastern and western boundaries and a new parkland area in the southern portion of the site to offset any potential impact on existing trees and vegetation. All retained trees will be protected during construction operations in accordance with the requirements of BS 5837:2012 Trees in Relation to Design, Demolition and Construction. The extent of tree removal for this application remains consistent with that of the approved application ABP-311181-21 and complies with the condition to retain the existing hedge line along the north eastern boundary of the site. There will be a net gain in tree stock across the site on completion of the works, with extensive new tree and native planting being undertaken within the open space.</p>
Ecological Assessment (AtkinsRéalis, 2025) Impact	<p>The following recommendations and mitigation measures are proposed:</p> <p><b>5.1.1 Drainage Design</b></p> <p>Sustainable urban Drainage Systems (SuDS) is a key focus for the entire design of the development and wider Masterplan lands. Along with permeable paving for parking areas, the landscape design includes for attenuation areas throughout the Phase 1 development by channelling runoff to planted areas and tree pits. This has the added benefit of reducing surface water runoff rates. In addition, planted swales will be created areas to aid with storm water flow and these planted areas will contain suitably water tolerant plant species. The roof areas which will include sedum and wildflower green roof treatments will further slowdown the flow of water from areas that traditionally contribute to high runoff flow rates during rainfall events.</p> <p><b>5.1.2 Habitats</b></p> <p>There will be loss of some amenity grassland and 4 no. sycamore trees within the development site during the construction phase. However, potential impacts have been minimised where possible via ecological input, including bat specialist recommendations, into the landscape design (included within the design documents for the proposed development submitted as part of this planning application). The design calls for the retention of the existing hedgerows around the development site boundary and inclusion of hedgerow planting where no boundary landscaping features are currently in situ. The development of the landscape design has been cognisant of existing flora and fauna on site, maintaining strong native boundary planting to ensure wildlife corridors are created. On the eastern side of the development site and Masterplan lands it is proposed to implement an extensive landscaping design which will connect to existing habitats including Woodbrook Glen (stream and woodlands) to the north and the River Dargle and associated Sea Gardens Phase 2 linear park to the south. This green buffer zone between the new housing development and the railway line will have large swathes of wild flower meadow, ornamental grasses, shrubs and herbaceous planting (refer to Landscape Design submitted with this application). In particular the ecologically friendly buffer zone will have mixed native hedge and woodland screening planting along the existing boundary fence to help create bat flight lines and foraging routes as well as providing connectivity between the dark zones of the River Dargle and Rathmichael Stream. The landscape design for this ecological buffer zone includes for shrub and screening planting which will allow for cover for the movement of mammals, including badgers, through the area. The planting mix will also include for gorse (<i>Ulex europaeus</i>) to provide habitat suitable for bird species such as stonechat. The landscaping design in this area calls for the planting of native wildflowers meadows and extensive planting of native trees with the aim to create semi-natural habitat akin to meadow and woodland edge. The planting schedule contains a mix of native plant species and emphasis has been placed on adhering to the objectives</p>



outlined in the All-Ireland Pollinator Plan 2021-2025 with the aim of planting species which are beneficial to pollinating insects. Plant species have also been carefully selected to be suitable for the coastal conditions. In addition to the diverse planting species mix at ground level, the roof level of the apartment block will be developed into green spaces to have a mix of sedum and wildflowers to further benefit pollinating species. Given the exposed nature of the development site a supplier of sedum carpets located in the east of Ireland has been identified to ensure the species are suitable for and acclimatised to the coastal conditions.

### 5.1.3 Birds

Tree clearance will be undertaken outside of bird nesting season (1st May – August 31st inclusive). Where tree clearance cannot be avoided during the nesting season period then NPWS will be consulted in advance and if, following consultation, it is deemed necessary then a suitably qualified ecologist should be appointed to ensure the area is free of nesting birds. If nests are found site clearance will be delayed until chicks have fledged and nesting is complete. The design of the development and wider Masterplan lands also includes for multiple bird (10 no.) to be installed in landscaped areas (including roof gardens). Bird boxes will include for 2 no. of Swift (*Apus apus*) nesting boxes to be installed in the landscaped area along the northern boundary of the development site. Bird boxes will also be fitted to trees throughout the development providing additional nesting and refuge for local passerine species. Within the landscape plan wildflowers, shrubs and trees which have the potential to support foraging populations of birds are proposed in the landscape plan and include (non-exhaustive list): - ▪ Gorse (*Ulex europaeus*) ▪ Hawthorn (*Crataegus monogyna*) ▪ Holly (*Ilex aquifolium*) ▪ Rowan/Mountain Ash (*Sorbus aucuparia*) ▪ Agapanthus africanus ▪ Alchemilla mollis ▪ Achillea millefolium ▪ Armeria maritima ▪ Rudbeckia fulgida

### 5.1.4 Bats

A bat survey was undertaken and no roosts were identified. The removal of trees is minimal and should not affect commuting or foraging capabilities of bats. Despite the minimal bat activity, measures have been included to reduce potential impacts on the local population of bats in the area and wider environs. The design calls for the installation of bat boxes. The locations and specifications of bat roosting sites/bat boxes has been informed by bat survey findings. There are 14 no. Rocket Bat boxes to be installed in the dark zones within the Phase 1 area of the Masterplan lands (including the development site). These will be free standing chambers on free standing poles. In addition, 14 no. of Summer Bat Boxes (1FF Schwegler woodcrete or similar design) will be erected within the trees on the northern boundary of the development site and Masterplan lands. In the area of the existing pumping station (south west of the Site) there is a screening wall of natural stone wall proposed for this location. The granted Phase 1 development design calls for the insertion of 8 no. bat tubes within this structure (8 no. interconnecting units – such as Interconnecting Woodstone Bat Box or similar design). The wall will be at least 3m high and bat boxes are to be inserted at the highest points on the wall and no lighting will be directed towards the wall. The locations and installation of bat boxes will be done under the supervision of a bat specialist. The design of the lighting around the proposed development has also been designed to be cognisant of minimising effects on local nocturnal species, such as bats and badgers, and has been developed so as to allow for a dark ecological corridor around the eastern boundary of the development site and Masterplan lands. The lighting design for the eastern side of the site has been developed with the following principals to the fore; only illuminating what needs to be illuminated (e.g. light directed to the path only), reducing night time light levels, reducing the height of the luminaires, shielding of luminaires and correct choice of light (e.g. a warm white spectrum <2700 Kelvins). Development specific lighting designs for the eastern ecological buffer zone include for: -All luminaires shall lack UV/IR elements to reduce impact; ▪ LED luminaires shall be used due to the fact that they are highly directional, have lower intensity, have good colour

rendition and dimming capability; ▪ A warm white spectrum <2700 Kelvins shall be used to reduce the blue light component of the LED spectrum; ▪ Luminaires shall feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats; ▪ Column heights shall be carefully considered to minimise light spill. The shortest column height allowed shall be used where possible, c. 5.5-6m or less; ▪ Bollard lighting shall be used for pedestrian and greenway areas, if lighting is deemed necessary; ▪ Only luminaires with an upward light ratio of 0% and with good optical control shall be used; ▪ Luminaires shall be mounted on the horizontal, i.e. no upward tilt; ▪ Any external security lighting shall be set on motion-sensors and short (1min) timers; and, ▪ The intensity of external lighting shall be limited to ensure that skyglow does not occur in order to reduce light pollution. The lighting design has been designed in accordance with guidance contained in; Institution of Lighting Professionals; Guidance Note 08/18; Bats and artificial lighting in the UK (ILP 2018). The lighting design has been reviewed by a bat specialist and recommendations have been incorporated into the design.

### 5.1.5 Badgers

The creation of an ecological buffer zone along the northern and eastern boundary of the development site and Masterplan lands will allow for connectivity of habitats. The buffer zone allows for connectivity between Rathmichael woodlands/stream and the railway underpass which leads to scrub habitat and Woodbrook golf club lands which are known to be badger foraging territory. During the construction phase no works will be undertaken during night time hours and as such the construction activities will not take place whilst local badgers are foraging. During the construction phase an access track will be in situ along the northern and eastern boundaries which will allow for continued connectivity for terrestrial mammals from Rathmichael woodlands to the railway underpass and to scrubland habitats to the east of the railway line. During the construction phase the following standard management and protection measures will be implemented during the construction works: ▪ No excavations are to be left uncovered overnight or without a means of egress (e.g. a ramp or sloped plank) to prevent terrestrial mammals (e.g. badgers) from falling in or entering in search of food and becoming trapped; ▪ No buildings or storage units are to be left open overnight to prevent terrestrial mammals from entering in search of food and becoming trapped; ▪ All food waste is to be properly secured and disposed of to avoid attracting mammals to the site; ▪ No toxic, poisonous or potentially harmful substances or materials are to be left unsecured overnight

### 5.1.6 Other Measures

The landscape design for the proposed development includes for the creation of wildflower areas to incorporate plant species which will attract pollinating insects. The installation of 10 no. insect hotels within the wider Phase 1 development will also form part of the wildflower landscaping measures and these insect boxes will allow for insects to establish and have refuge in the landscaped areas. The planting schedule contains a mix of native plant species and emphasis has been placed on adhering to the objectives outlined in the All-Ireland Pollinator Plan 2021-2025 with the aim of planting species which are beneficial to pollinator species. Pollinator beneficial plant species include (non-exhaustive list): - ▪ *Nepeta 'Walker Low'* ▪ *Salvia nemorosa* ▪ *Lavandula angustifolia* ▪ *Achillea millefolium* ▪ *Armeria maritima* ▪ Hemp Agrimony ▪ Black Meddick ▪ Musk mallow ▪ Wild primrose ▪ Hedge woundwort

### 5.1.7 Landscaping Establishment

The landscape design calls for an ecological buffer zone around the northern and eastern boundaries of the development site. This planted buffer zone will ensure the area provides for bat flight lines and badger foraging connectivity to/from the ecological features to the north (Rathmichael woodlands), east (scrub habitat and golf club lands) and south (River Dargle and remainder of former Bray Golf

Activity	Mitigation Measures
	<p>Club lands). Once operational the implementation of the landscape plan and compensatory habitat such as wildflower meadows and additional planting will be inspected by the Contractor within one year post planting. If measures have failed due to lack of management an alternative solution will be proposed by the Contractor. Operational phase monitoring (in order to ensure the continued success of the landscape features, specifically in relation to biodiversity enhancement measures) shall be undertaken by those in charge of the maintenance and management of the development.</p> <p><b>5.1.8 Refuge Habitats</b></p> <p>The design of the development calls for the installation of numerous bird nesting boxes, bat roosting boxes and insect boxes. Refuge boxes will be checked and maintained to ensure they do not fall into disrepair. It is recommended that bird boxes are checked and cleared of remnant nests during the winter season (as required). Operational phase monitoring in order to ensure the success of the refuge habitats shall be undertaken by those in charge of the maintenance and management of the development.</p>

## 7.7 Light Pollution

Obtrusive light from a construction site is a form of pollution. Construction lights can cause glare and light trespass. These are forms of obtrusive light which may cause nuisance to others.

### 7.7.1 Risk Identification

Contractors shall undertake a qualitative light pollution risk assessment or appraisal prior to the commencement of construction activities. An example risk assessment is shown in Table 7.13.

**Table 7.13 – Example of Light Pollution Risk Assessment**

Risk Assessment	Example procedure
01 Identify the location of all sensitive receptors within or adjacent to the construction site.	Mark a site plan with the location of all potential receptors including housing, schools, hospitals, roads and key wildlife populations. This will help the planning of the overall layout of the construction site and enable the identification of suitable sites for lighting.
02 Identify the construction activities and sources of light pollution that may affect the receptors identified.	These could include depots, storage areas, night working activities etc.
03 Evaluate the risk of the construction activities creating light pollution for the identified receptors.	Assess the likelihood of an activity causing pollution, damage or harm.
04 Implement mitigation to eliminate or reduce risks.	Use the following hierarchy to manage the risk: <ol style="list-style-type: none"> <li>1. Remove the risk (different construction methods/activities).</li> <li>2. Control the source (modify construction methods; provide adequate screening, directional light).</li> <li>3. Protect the receptor (screens).</li> <li>4. Put emergency procedures in place.</li> </ol>



## 7.7.2 Light Pollution Control Plan

Contractors should develop, implement and maintain a Light Pollution Control Plan. The Plan should include but not be restricted to the mitigation measures below (Table 7.14).

**In addition, all relevant mitigation measures stipulated within the SHD 2 application for this site area (ABP-314686-22) EIAR Chapter 15 – Schedule of Environmental Commitments of Volume 2- the Main EIAR (which is replicated for ease within Appendix A of this document) will apply throughout the construction phase, and must be incorporated within the Contractors CEMP.**

**Table 7.14 –Light Pollution Mitigation Measures**

Activity	Mitigation Measures
General	<p>Maintain levels of lighting acceptable for health and safety and avoid over lighting areas.</p> <p>Dim or switch off lights when task is finished.</p> <p>Minimise the spread/glare of light by assessing/managing direction.</p> <p>Lower the height of lights to minimise glare.</p> <p>Use screens, shields, baffles and louvers to help reduce light spill.</p> <p>Use specifically designed lighting equipment to minimise the upward spread of light near to and above the horizontal.</p>
EIAR Chapter 15 – Schedule of Environmental Commitments of Volume 2- the 2022 EIAR (ABP-314686-22) (which is replicated for ease within Appendix A)	<p>To minimise disturbance to bats and other fauna (badger and otter) that are roosting/resting or active at night, no construction operations will be undertaken during the hours of darkness. If construction lighting is required during the bat activity period (dusk April to September), lighting shall be directed away from all hedgerow/ treeline habitats to be retained. This can be achieved by using directional lighting (i.e. lighting which only shines on the proposed works and not nearby countryside) to prevent overspill.</p> <p>Street Lighting will be implemented in accordance with the Utilities Report prepared by Metec (2025) submitted as part of this planning application. The Site Lighting Report (Metec, 2025) also sets out the lighting restrictions for the development and concluded that <i>‘Luminaire selection limits upward light spill and takes cognizance of local wildlife. The lighting scheme achieves the recommended lux levels in accordance with current regulations and standards. The lighting scheme achieves good uniformity throughout the development to ensure good visibility at night’</i>.</p> <p>Refer also to the relevant mitigation measures in Chapter 15 – Schedule of Environmental Commitments of Volume 2- the Main EIAR (which is replicated for ease within Appendix A of this document). All relevant mitigation measures within the EIAR in relation to the construction and operational phases must be fully implemented.</p>

## 7.8 Archaeology and Cultural Heritage

Heritage is an irreplaceable resource, so it is recognised that cultural resources must be safeguarded for future generations. Construction activities have the potential to impact on archaeology and heritage through the destruction or disturbance of sites or artefacts.

### 7.8.1 Risk Identification

Contractors shall undertake a qualitative archaeological and heritage risk assessment or appraisal prior to the commencement of construction activities. An example risk assessment is shown in Table 7.15.

**Table 7.15 – Example of Archaeology and Cultural Heritage Risk Assessment**

Risk Assessment	Example Procedure
01	Identify the location of all sensitive receptors within or adjacent to the construction site.
Mark a site plan with the location of all potential receptors including villages, forts, palaces, houses, and towers. This will help the planning of the overall layout of the construction site.	
02	Identify the construction activities that may affect the receptors identified.
These could include depots, storage areas, excavation, waste storage, haul roads etc.	
03	Evaluate the risk of the construction activities damaging the identified receptors.
Assess the likelihood of an activity causing pollution, damage or harm.	
04	Implement mitigation to eliminate or reduce risks.
Use the following hierarchy to manage the risk: <ol style="list-style-type: none"> <li>1. Remove the risk (different construction methods/activities).</li> <li>2. Control the source (modify construction methods or operations - alternative haul roads).</li> <li>3. Protect the receptor (screens).</li> <li>4. Put emergency procedures in place.</li> </ol>	

## 7.8.2 Archaeology and Cultural Heritage Management Plan

Contractors should develop, implement and maintain an Archaeology and Heritage Management Plan. The Plan should include but not be restricted to the mitigation measures below (Table 7.16).

**In addition, all relevant mitigation measures stipulated within the SHD 2 application for this site area (ABP-314686-22) EIAR Chapter 15 – Schedule of Environmental Commitments of Volume 2- the Main EIAR (which is replicated for ease within Appendix A of this document) will apply throughout the construction phase, and must be incorporated within the Contractors CEMP.**

**Table 7.16 –Archaeology and Cultural Heritage Mitigation Measures**

Activity	Mitigation Measures
General	<p>In the event that intact and/or important archaeological or cultural items are identified during construction activities, work must stop and DLR County Council and the Department of Arts, Heritage and the Gaeltacht and the National Museum of Ireland should be notified immediately. Work should not recommence until authorised by Dún Laoghaire Rathdown County Council and the Department of Arts, Heritage and the Gaeltacht and the National Museum of Ireland.</p> <p>Records should be maintained of all finds.</p> <p>Where practicable remains should be preserved in situ using appropriate engineering methods:</p> <ol style="list-style-type: none"> <li>1. Raising ground levels</li> <li>2. Using suitable materials and loading</li> <li>3. Maintenance of Hydrological regimes.</li> </ol>
EIAR Chapter 15 – Schedule of Environmental Commitments of Volume 2- the 2022 EIAR (ABP-314686-22) (which is replicated for ease within Appendix A)	<p><b>(See also details below from JCA, 2025)</b></p> <ul style="list-style-type: none"> <li>▪ A Geophysical Survey was prepared for the development site in October 2020 by JM Leigh Surveys and Archaeological Test Trenching was undertaken by John Cronin and Associates in October 2020.</li> <li>▪ The following mitigation measures and monitoring shall be implemented in full by the Contractor during the construction works (Refer to Chapter 11 of Volume 2 EIAR 2022);</li> <li>▪ ‘A suitably qualified archaeologist will be appointed by the Developer to carry out a programme of archaeological monitoring of ground excavation works during the construction phase and this will be carried out under a licence issued by the National Monument Service. Given the</li> </ul>

absence of any unrecorded, sub-surface archaeological features identified during the geophysical survey and subsequent test trenching investigations carried out as part of this assessment the potential for the presence of such features is not considered likely but in the event that any archaeological remains are identified during monitoring they will be recorded and left to remain securely in situ while the National Monuments Service are consulted to determine further appropriate mitigation measures, which may entail preservation in situ by avoidance or preservation in record by archaeological excavation.

- The positioning of the roads and residential blocks have been arrayed so that they form a spatial marker (or morphological memory) of the 'Nun's Walk' former location and alignment. The Nun's Walk will feature and be defined by engraved paving slabs laid through the public open space area located between apartment blocks A and B to echo the alignment of this linear earthwork along with the alignment of the boundary between Dublin and Wicklow. This feature will run through the paved area that also provides drop off access to the entrance of Block A. The space also allows for the potential installation of public artwork to further define the character and mark the history of the space, including delineation of the alignment of the earthwork through paving, interpretive text and imagery. In addition, the design provides for a feature stone wall along this section of the railway boundary to act as 'stage scenery' and reinforce the importance of this area of open space. This open space will provide connectivity with the Green Spine and the Coastal Gardens character areas to maintain pedestrian permeability throughout the development. The Landscape Design also provides for high quality surface materiality - refer to the Landscape Design Strategy Report and Cultural Heritage Chapter for further information.
- 'There are a number of obligatory processes required as part of archaeological licence applications to the National Monuments Service and these will allow for monitoring of the successful implementation of the archaeological mitigation measures presented in Section 11.7.1. The archaeologist appointed to undertake licensed monitoring of the construction phase shall submit a method statement detailing the proposed strategy for archaeological supervision of ground works to the National Monuments Service as part of the license application. This will clearly outline the proposed extent of ground works and outline the consultation process to be enacted in the event that any unrecorded archaeological remains are identified, which may include preservation in situ by avoidance or preservation in record by archaeological excavation. The appointed archaeologist will compile a report on all archaeological Site investigations which will clearly present the results in written, drawn and photographic formats. Copies of this report will be submitted to the National Monuments Service and the National Museum of Ireland by the appointed archaeologist.'

John Cronin & Associates  
Archaeological  
commentary Letter  
09/06/2025 (2025)

The Sea Gardens Phase 1 lands, including the subject site, have previously been subject to several archaeological investigations undertaken by John Cronin & Associates as part of the planning process. These investigations include a geophysical survey (Detection Licence No. 20R02014) followed by a programme of targeted archaeological test trenching and metal detection (Excavation Licence No. 20E0482, Detection Licence No. 20R0179). A programme of archaeological monitoring of topsoil stripping within greenfield areas of the Sea Gardens Phase 1 lands was carried out under Excavation Licence No. 22E0552 in response to Condition no. 28 attached to grant of planning permission (ABP 311181-21). An area of approximately 3.4 hectares was archaeologically monitored and nothing of an archaeological nature was found. The monitored area included the western portion of the proposed Block A site. The current line of the county boundary which forms the southern boundary of the subject site is defined by a linear earthwork which has been designated as a recorded archaeological monument and is included in the Record of Monuments and Places (RMP) for County Dublin and Wicklow (DU026-124- ---, WI004-005----). The original designation of this feature as a recorded archaeological monument was based on a theory that the earthwork represented the remains of the 'Pale' ditch which surrounded the Dublin region in later medieval times. According to local information the linear earthwork is known as the 'Nuns Walk', recalling the use of the earthwork as a delineated pathway through the golf club to the sea shore from the adjoining Ravenswell Convent to the south. Recent archaeological investigations undertaken for the Sea Gardens Phase 1 development suggests that the feature was formed as a result of the landscaping associated with the northern expansion of the Bray Golf Club into the former grounds of Ravenswell House in the early 20th century. This expansion included the proposed Block A site which was developed as part of the golf course at this time. Hand excavated trenches across the recorded linear earthwork (DU026-124 / WI004-005) were excavated under licence from the Department of Housing, Local Government and Heritage (Excavation Licence 20E0482). These trenches confirmed the earthwork to be a late 19th - or early



20th -century landscape feature. The archaeological monitoring of the removal of topsoil from a segment of the earthwork identified a circa 1m wide linear ditch with red brick fragments and mortar on its surface which also contained a quantity of 18th /19th century ceramics. The excavators concluded that the linear earthwork is not archaeological in nature.

Condition No. 29 of planning permission (ABP-311181-21) required the linear earthwork to be incorporated in some regard into the design of the proposed development from the western to the eastern boundary. However following the submission of archaeological reporting to the National Monuments Service (NMS) of the Department of Housing, Local Government and Heritage, Ms Maeve O’Callaghan, Archaeologist with NMS stated the following (in an email) in relation to Condition No. 29: ‘...the National Monuments Service concurs with the findings of the archaeological work completed on site to date which suggest that the recorded linear earthwork (WI005-005--- DU026-124) is unlikely to be archaeological in nature. The archaeological report states that “the linear earthwork within the development site boundary was formerly thought to represent a section of the Pale ditch, however recent archaeological investigations has shown that it is, in fact, a 19th or 20th century landscape feature.” The National Monuments Service concurs with this conclusion and does not consider it necessary to erect interpretative signage relating to the Pale Ditch’.

The archaeological monitoring report for Excavation Licence No. 22E0552 concluded that the residual greenfield land within the Sea Gardens Phase 1 development site retain an archaeological potential and recommended that future topsoil stripping in such areas would be subject to a programme of licenced archaeological monitoring. This recommendation still applies to greenfield areas within the proposed Phase 1 Block A development site. The letter of commentary on the revised proposals for Block A of Phase 1 Sea Gardens confirmed that the revised development proposal currently under consideration does not affect or alter the findings and mitigation recommendations presented in previous archaeological assessments and reports issued in relation to the Sea Garden Phase 1 lands (John Cronin & Associates, 2025).

## 7.9 Traffic Management

Accidents involving construction vehicles and/or mobile equipment have the potential to cause serious injury or death and damage to the environment. Work zones on construction sites are used to move traffic in an approved direction and are typically identified by signs, cones, barrels, and barriers.

### 7.9.1 Risk identification

Contractors shall undertake a traffic management risk assessment or appraisal prior to the commencement of construction activities. An example risk assessment is shown in Table 7.17.

**Table 7.17 – Example of Traffic Management Risk Assessment**

	Risk Assessment	Example Procedure
01	Identify the location of all traffic sensitive areas within or adjacent to the construction site.	Mark a site plan with the location of all potential traffic sensitive areas including villages, forts, palaces, houses, schools, shopping districts, commercial/leisure areas roads and other rights of way.  This will help the planning of the overall layout of the construction site and enable the identification of suitable sites for vehicle/pedestrian entrances, storage areas etc.
02	Identify the construction activities may affect the traffic sensitive areas identified.	These could include depots, storage areas, excavation, waste storage, haul roads etc.
03	Evaluate the risk of the construction activities impacting on traffic sensitive areas.	Assess the likelihood of an activity causing harm or obstruction.

Risk Assessment		Example Procedure
04	Implement mitigation to eliminate or reduce risks.	Use the following hierarchy to manage the risk: <ol style="list-style-type: none"> <li>1. Remove the risk (different construction methods/activities).</li> <li>2. Control the source (modify construction methods or operations - alternative haul roads).</li> <li>3. Protect the receptor (screens, signs, barriers).</li> <li>4. Put emergency procedures in place.</li> </ol>

## 7.9.2 Traffic Management Control Plan

Contractors should develop, implement and maintain a Traffic Management Control Plan. The Plan forms an important management tool that acts as the catalyst for reducing the negative transport effects of construction work (e.g. congestion, air pollution and noise) on local communities, residents, businesses and the environment. By promoting efficient working practices, shorter haulage routes and reducing deliveries, the implementation of the Plan not only gives rise to the above benefits, but also helps save costs.

The Plan should include but not be restricted to the mitigation measures below (Table 7.18).

**In addition, all relevant mitigation measures stipulated within the SHD 2 application for this site area (ABP-314686-22) EIAR Chapter 15 – Schedule of Environmental Commitments of Volume 2- the Main EIAR (which is replicated for ease within Appendix A of this document) will apply throughout the construction phase, and must be incorporated within the Contractors CEMP.**

**Table 7.18 –Traffic Management Mitigation Measures**

Activity	Mitigation Measures
General	Contractors will ensure that all operators are fit and competent to operate vehicles, machines and attachments by: <ul style="list-style-type: none"> <li>• Undertaking checks when recruiting drivers/operators or hiring contractors.</li> <li>• Providing appropriate training for drivers and operators.</li> <li>• Managing the activities of visiting drivers.</li> <li>• Ensuring that signallers, flag men and bank men are appropriately trained and authorised.</li> </ul> Access to vehicles will be restricted to prevent unauthorised access. Routes will be clearly marked and where practicable turning circles will be provided to prevent reversing. Contractors will ensure that all roads and footpaths are maintained free of mud and debris. All visitors to the site will be required to undertake a site induction and wear high visibility clothing/PPE. All roads and footpaths affected by construction activity will be appropriately reinstated/repaired.
Travel Plan	The plan will be prepared to ensure access to the site by sustainable travel modes is encouraged. The following measures should be considered where relevant: <ul style="list-style-type: none"> <li>• The provision of showers/change rooms for construction staff;</li> <li>• The provision of cycle parking for staff;</li> <li>• The promotion of car sharing among staff, including van pooling travel between different work sites.</li> </ul>
Pedestrian Safety	Contractors will provide clear warning signage, lighting and barriers at construction works. Where practicable the contractor will provide separate entrances and exits for vehicles and pedestrians in work areas.

Contractors will ensure that drivers driving onto public roads can see and be seen before moving on to it.

Appropriately trained signallers/flag man/banks men will be used to control vehicle and plant movement on public roads.

Contractors will ensure that, as far as practicable, construction works do not block/obstruct walkways and roads.

EIAR Chapter 15 – Schedule of Environmental Commitments of Volume 2- the 2022 EIAR (ABP-314686-22) (which is replicated for ease within Appendix A)

**(See also details below from TIA AtkinRéalisis, 2025)**

A Traffic and Transport Assessment has been prepared by AtkinsRéalisis (2022) in support of the previous planning application which outlines the following mitigation measures which are to be adopted during the construction works by the Contractor. Note that this is not an exhaustive list, and it will be the appointed contractor’s responsibility to prepare a detailed Construction Traffic Management Plan to be approved with the Planning Authority prior to commencement of construction.

- Warning signs / Advanced warning signs will be installed at appropriate locations in advance of the construction access;
- Construction and delivery vehicles will be instructed to use only the approved and agreed means of access and movement of construction vehicles will be restricted to these designated routes;
- Restriction of HGV movements during drop off and pick up times associated with the adjacent schools;
- Appropriate vehicles will be used to minimise environmental impacts from transporting construction material, for example the use of dust covers on trucks carrying dust producing material;
- Speed limits of construction vehicles to be managed by appropriate signage, to promote low vehicular speeds within the Site;
- Parking of Site vehicles will be managed, and will not be permitted on public roads, unless proposed within that designated area that is subject to traffic management measures;
- A road sweeper will be employed to clean the public roads adjacent to the Site of any residual debris that may be deposited on the public road leading away from the construction Site;
- On Site wheel washing will be undertaken for construction trucks and vehicles to remove any debris prior to leaving the Site, to avoid any potential for debris on the local roads;
- All vehicles will be suitably serviced and maintained to avoid leaks or spillage of oil, petrol or diesel. Spill kits will be available on Site. All scheduled maintenance carried out off Site will not be carried out on the public highway; and,
- Safe and secure pedestrian facilities are to be provided where construction works obscure any existing pedestrian footway. Alternative pedestrian facilities will be provided in these instances, supported by physical barriers to segregate traffic and pedestrian movements, and to be identified by appropriate signage. Pedestrian facilities will cater for vulnerable users and mobility impaired persons.
- HGV movements will be managed so as not to occur during the background traffic peak period, particularly the AM school drop off period.

The above mitigation measures will minimise any significant environmental degradation or safety concerns in the vicinity of the proposed works, due to the presence of construction traffic. Furthermore, it is in the interest of the construction programme that deliveries, particularly concrete deliveries are not unduly hampered by traffic congestion, and as a result continuous review of haulage routes, delivery timings and access arrangements will be undertaken as construction progresses to ensure smooth operation.

- Refer also to the relevant mitigation measures in Chapter 15 – Schedule of Environmental Commitments of Volume 2- the Main EIAR 2022 (which is replicated for ease within Appendix



A of this document). All relevant mitigation measures within the EIAR in relation to the construction and operational phases must be fully implemented.

Traffic Impact Assessment (AtkinRéalis, 2025)

The application site, Block A, is part of a larger development of the former Bray Golf Club lands known as Sea Gardens Masterplan, previously submitted under An Bord Pleanála (ABP) planning registration reference numbers 311181 and 314686.

Many of the transport and traffic design principles, including road layouts, pedestrian and cycle facilities were established during the previous permitted Sea Gardens applications. It should be noted that in the permitted phase 1 application, to which this development formed part of an assessment of all the Sea Garden Masterplan Lands was considered as part of the cumulative assessment in the Phase1 EIAR planning application.

There are excellent public transport facilities adjacent to the site including Bray railway station and bus services on Dublin Road Corridor, that will be augmented by the recent decision (Q1 2025) by ABP to grant permission for the Bray to Dublin City Centre Core Bus Corridor scheme. Added to this the development proposes integrated walking and cycling facilities that tie into the Sea Gardens masterplan strategy providing a comprehensive and safe environment for active travel.

Block A has been designed to align with the permitted and under-construction street and road network within the masterplan lands. The development embraces sustainable transport principles, including, Reduced car parking provision in line with national and local policies. High-quality cycle parking facilities and enhanced permeability and connectivity, encouraging walking, cycling, and public transport use. These measures are expected to minimise traffic generation and reduce the overall traffic impact of the Sea Gardens Masterplan on the surrounding road network.

Traffic impacts from the proposed development are negligible, with less than 1% increase at external junctions. The traffic impacts falling below thresholds set by the TII Transport Assessment Guidelines.

In overall terms, the development will be fully consistent with the National Planning Framework and Compact Settlement Guidelines objectives of compact growth in a location that will optimise future users' opportunities to travel by active travel and public transport modes, fully consistent with the overall objectives of the NTA Greater Dublin Area Transport Strategy.

The development therefore presents as an exemplar of integrated land use and transportation planning that is fully consistent with the 'Avoid - Shift -Improve Model' as set out in the Dun Laoghaire Rathdown Development Plan which is based on avoiding or reducing the need to travel, shifting to more environmentally friendly modes and improving the efficiency of motorised transport modes.

## 7.10 Contaminated Land

The term 'land contamination' covers a wide range of situations where land is contaminated in some way by previous use. This is often associated with industrial processes or activities that have now ceased, but where waste products or remaining residues present a hazard to the general environment.

### 7.10.1 Risk Identification

Contractors shall undertake a contaminated land risk assessment or appraisal prior to the commencement of construction activities. An example risk assessment is shown in Table 7.19.

**Table 7.19 – Example of Contaminated Land Risk Assessment**

Risk Assessment		Example Procedure	
01	Identify the location of contamination risks	of	Mark a site plan with the location of all potential contamination risks including waste deposits, petrol stations, oil stores etc.



	Risk Assessment	Example Procedure
	undertaking site visits and desk based studies of relevant documents - EIA etc.	
02	Identify the construction activities may create ground contamination.	These could include depots, storage areas, waste storage, etc.
03	Evaluate the risk of the construction activities leading to ground contamination.	Assess the likelihood of an activity causing pollution, damage or harm.
04	Implement mitigation to eliminate or reduce risks.	Use the following hierarchy to manage the risk: <ol style="list-style-type: none"> <li>1. Remove the risk (different construction methods/activities).</li> <li>2. Control the source (modify construction methods or operations)</li> <li>3. Protect the ground (screens).</li> <li>4. Put emergency procedures in place.</li> </ol>

## 7.10.2 Contaminated Land Control Plan

Contractors should develop, implement and maintain a Contaminated Land Control Plan. The Plan should include but not be restricted to the mitigation measures below (Table 7.20).

**In addition, all relevant mitigation measures stipulated within the SHD 2 application for this site area (ABP-314686-22) EIAR Chapter 15 – Schedule of Environmental Commitments of Volume 2- the Main EIAR 2022 (which is replicated for ease within Appendix A of this document) will apply throughout the construction phase, and must be incorporated within the Contractors CEMP.**

**Table 7.20 – Example of Contaminated Land Mitigation Measures**

Activity	Mitigation Measures
General	<p>The contractor will manage and control the potential contamination of land from construction activities through the implementation of the CEMP and method statements as appropriate.</p> <p>The contractor will notify AtkinsRéalis immediately if contaminated land is discovered or suspected.</p> <p>The contractor will work with AtkinsRéalis to:</p> <ul style="list-style-type: none"> <li>• Undertake a risk assessment of the potential contamination.</li> <li>• Evaluate options for remediation including: <ul style="list-style-type: none"> <li>○ Containment</li> <li>○ Monitoring</li> <li>○ Treatment</li> <li>○ Removal/Disposal</li> </ul> </li> </ul> <p>The contractor will implement a remediation strategy and monitor as appropriate.</p>
Ground Investigation Records / Site Setting	<p>Ground investigation records for the masterplan lands confirm that no visual or olfactory evidence of soil contamination was encountered at any of the exploratory locations across the Site.</p> <p>There is also a historic landfill located immediately to the east and down gradient of the Site, known as the former Bray Municipal Landfill. This landfill has been the subject of a phased environmental risk assessment process. A site investigation, Tier 2 Environmental Risk Assessment (Fehily Timoney &amp; Co., 2016) and Remediation Option Appraisal (Fehily Timoney &amp;</p>

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Co., 2017) have been carried out on the historic landfill Site to fully assess the current ground conditions and potential risk that the former landfill could pose to human health and environmental receptors in the vicinity. No unacceptable risk was identified offsite, and remediation works have since been completed at the site. Therefore, the historic landfill does not pose a risk of contamination to the subject site.

However, as a precautionary measure, the potential risk of encountering ground contamination should be addressed by the Contractor in the Detailed CEMP.

- A response procedure will be put in place to deal with any accidental pollution events. Any spillage of fuels, lubricants or hydraulic oils will be immediately contained and the contaminated soil removed from the proposed development and properly disposed of in accordance with all relevant waste management legislation:
  - All Site vehicles used will be refuelled in bunded and adequately sealed and covered areas in the construction compound area;
  - All oil stored on Site for construction vehicles will be kept in a locked and bunded area;
  - Generators, pumps and similar plant will be placed on drip-trays to prevent contamination;
  - All Site vehicles used will be refuelled in bunded areas;
  - All temporary construction fuel tanks will also be located in a suitably bunded area and all tanks will be double skinned. Relevant Material Safety Data Sheets along with oil absorbent materials will be kept on Site in close proximity to any fuel storage tanks or bowsers during proposed Site development works; and,
  - All fuel / oil deliveries to on-Site oil storage tanks will be supervised, and records will be kept of delivery dates and volumes.
- Stripping of topsoil will be carried out in a controlled and carefully managed way and coordinated with the proposed staging for the development. At any given time, the extent of topsoil strip (and consequent exposure of subsoil) will be limited to the immediate vicinity of active work areas. Topsoil stockpiles will be protected for the duration of the works and will be located so as not to necessitate double handling.
- The design of road levels and finished floor levels has been carried out in such a way as to minimise cut/fill type earthworks operations. The duration that subsoil layers are exposed to the effects of weather will be minimised. Disturbed subsoil layers will be stabilised as soon as practicable (e.g. backfill of service trenches, construction of road capping layers, construction of building foundations and completion of landscaping). Similar to comments regarding stripped topsoil, stockpiles of excavated subsoil material will be protected for the duration of the works. Stockpiles of subsoil material will be located separately from topsoil stockpiles. The Contractor will be responsible for ensuring these measures are fully implemented.
- The excavation of material will be minimised as much as possible to reduce the impact on soils and geology. Any surplus material, or materials which are deemed not suitable for onsite reuse will be classified in accordance with the EPA Guidance Document '*Waste Classification, List of Waste & Determining if Waste is Hazardous or Non-Hazardous*' (2015). It will be the Contractors responsibility to ensure that all waste soils are classified correctly and managed, transported and disposed of offsite in accordance with the requirements of the Waste Management Act 1996, as amended, the Waste Framework Directive 2008/98/EC of the European Parliament and Council on waste and any relevant subsequent waste management legislation.

Further mitigation measures for the prevention of soil / bedrock contamination during construction are proposed below. The Contractor will be responsible for ensuring these measures are fully implemented. Mitigation measures outlined in Section 7.4, Prevention of Soil and Water Pollution are also applicable to the protection of soils and geology during the construction phase:

- In advance of commencement of the Construction Stage, any onsite monitoring wells will be fully decommissioned by an experienced borehole specialist in accordance with relevant guidelines, 'Good practice for decommissioning redundant boreholes and wells' (UK Environment Agency, 2012);
- Earthworks / piling plant and vehicles delivering construction materials to Site will be confined to predetermined haul routes around the Site for each phase of the proposed development;

- The need for vehicle wheel wash facilities will be assessed by the Contractor depending on the phasing of works and onsite activity and will be installed as needed, near any Site entrances and road sweeping implemented as necessary to maintain the road network in the immediate vicinity of the Site;
- Dust suppression measures (e.g. dampening down) will be implemented as necessary during dry periods;
- All excavated materials / piling arisings will be stored away from the excavations / immediate works area, in an appropriate manner at a safe and stable location. The maximum height of temporary stockpiles will be 3m;
- A comprehensive monitoring and supervisory regime including monitoring of all excavations and stability assessments as required will be put in place to ensure that the proposed construction works do not constitute a risk to the stability of the Site;
- The employment of good construction management practices will serve to minimise the risk of pollution from construction activities at the proposed development in line with the Construction Industry Research and Information Association (CIRIA) publication entitled, Control of Water Pollution from Construction Sites, Guidance for Consultants and Contractors, CIRIA - C532 (2001); and,
- Specifically, regarding pollution control measures, the following will be adhered to;
  - Fuels, lubricants and hydraulic fluids for equipment used on the construction Site, as well as any solvents, oils, and paints will be carefully handled to avoid spillage, properly secured against unauthorised access or vandalism, and provided with spill containment according to best codes of practice;
  - Waste oils and hydraulic fluids will be collected in leak-proof containers and removed from the proposed development for disposal or re-cycling;
  - Any spillage of fuels, lubricants or hydraulic oils will be immediately contained and the contaminated soil removed from the proposed development and properly disposed of;
  - All Site vehicles used will be refuelled in bunded and adequately sealed and covered areas in the construction compound area;
  - All plant and machinery will be serviced before being mobilised to Site;
  - No plant maintenance will be completed on Site, any broken-down plant will be removed from Site to be fixed;
  - Refuelling will be completed in a controlled manner using drip trays at all times;
  - Mobile bowsers, tanks and drums will be stored in secure, impermeable storage areas away from open water;
  - Fuel containers will be stored within a secondary containment system, e.g. bunds for static tanks or a drip tray for mobile stores;
  - Containers and bunding for storage of hydrocarbons and other chemicals will have a holding capacity of 110% of the volume to be stored;
  - Ancillary equipment such as hoses and pipes will be contained within the bund;
  - Taps, nozzles or valves will be fitted with a lock system;
  - Fuel and chemical stores including tanks and drums will be regularly inspected for leaks and signs of damage;
  - Drip-trays will be used for fixed or mobile plant such as pumps and generators to retain oil leaks and spills;
  - Only designated trained operators will be authorised to refuel plant on Site;
  - Procedures and contingency plans will be set up to deal with emergency accidents or spills;
  - An emergency spill kit with oil boom, absorbers etc. will be kept on-site for use in the event of an accidental spill. A specific team of staff will be trained in the use of spill containment;
  - Strict supervision of contractors will be adhered to in order to ensure that all plant and equipment utilised on-Site is in good working condition. Any equipment not meeting the

required standard will not be permitted for use within the Site. This will minimise the risk of soils and bedrock becoming contaminated through Site activity; and,

- The highest standards of Site management will be maintained and utmost care and vigilance followed to prevent accidental contamination or unnecessary disturbance to the Site and surrounding environment during construction. A named person will be given the task of overseeing the pollution prevention measures agreed for the Site to ensure that they are operating safely and effectively.

The above mitigation measures will be incorporated (as required) during Detailed Design Stage, and will form part of a site-specific Construction Environmental Management Plan (CEMP) which will be implemented during the Construction Stage (including initial Site preparatory / enabling works).

Refer also to relevant mitigation measures within Chapter 15 – Schedule of Environmental Commitments of Volume 2- the Main EIAR 2022 (which is replicated for ease within Appendix A of this document). All relevant mitigation measures within the EIAR in relation to the construction and operational phases must be fully implemented.

## 7.11 Soil Erosion and Sedimentation

Soil eroded during land disturbance can wash away and contaminate storm water drains and nearby water bodies. The plan establishes a series of mitigation and management measures to control and minimise these issues if required. Water erosion potential depends on the intensity of the rainfall and/or construction discharges, the soil type and topography. This section identifies the potential causes of erosion and sedimentation which may arise from construction and provides guidance on the management, control and disposal of waste.

### 7.11.1 Risk Identification

Contractors shall undertake a qualitative soil erosion and sedimentation risk assessment or appraisal prior to the commencement of construction activities. An example risk assessment is shown in Table 7.21.

**Table 7.21 – Example of Soil Erosion and Sedimentation Risk Assessment**

Risk Assessment	Example Procedure
01	Identify the location of all activities that could result in erosion and sedimentation, for example dewatering, and sensitive receptors within or adjacent to the construction site.
01	Mark a site plan with the location of all water courses, surface water features, boreholes, field drains, ecologically sensitive areas including surface and foul drainage systems and other potential receptors.  This will help the planning of the overall layout of the construction site and enable the identification of suitable sites for high risk activities such as dewatering, haul routes and wash out areas.
02	Identify sensitive receptors off site or downstream of the construction project that could potentially be affected by the works. For example water courses and ecologically sensitive areas/nature reserves.
02	Mark a site plan with sensitive receptors outside the site boundary.  This will help the planning of the overall layout of the construction site and enable the identification of suitable sites for high risk activities such as dewatering, haul routes and wash out areas.
03	Identify the construction activities and sources of sedimentation/erosion that may affect the water receptors identified.
03	These could include excavations, dewatering, water course crossings, as well as general sources of pollution such as surface water runoff and concrete use.
04	Evaluate the risk of the construction activities polluting the identified water receptors.
04	Assess the likelihood of an activity causing pollution.  Assess the significance of the harm sedimentation/erosion would cause to a particular water receptor.

Risk Assessment		Example Procedure
05	Evaluate the risk of the construction activities contributing to and/or being affected by the groundwater table.	Assess the likelihood of an activity contributing to raised groundwater levels or being affected by these. Assess the significance of the harm additional water would cause to groundwater or other projects/receptors and the significance of the high water table on construction.
06	Implement mitigation to eliminate or reduce risks.	Use the following hierarchy to manage the risk: <ol style="list-style-type: none"> <li>1. Remove the risk (different construction methods/activities).</li> <li>2. Control the source (modify construction methods, provide adequate bunding for storage areas, install measures such as silt fences or ditches to control runoff).</li> <li>3. Protect the receptor (provide hard standing for compounds/storage areas, filter, control, contain discharges, ensure appropriate environmental permits are in place).</li> <li>4. Put emergency procedures in place.</li> </ol>

## 7.11.2 Soil Erosion and Sedimentation Management Plan

Contractors should develop, implement and maintain an Erosion and Sedimentation Management Plan. The Plan should include but not be restricted to the mitigation measures below (Table 7.22).

In addition, all relevant mitigation measures stipulated within the SHD 2 application for this site area (ABP-314686-22) EIAR Chapter 15 – Schedule of Environmental Commitments of Volume 2- the Main EIAR 2022 (which is replicated for ease within Appendix A of this document) will apply throughout the construction phase, and must be incorporated within the Contractors CEMP.

Table 7.22 –Soil Erosion and Sedimentation Mitigation Measures

Activity	Mitigation Measures
Soil Erosion	<p>Methods to control erosion need to take into account the factors causing erosion – rainfall discharge intensity, soil type and topography. Possible erosion control measures may include, but are not limited to the following:</p> <ul style="list-style-type: none"> <li>• Avoid the creation of steep slopes. Consider implementing terraces instead of long steep slopes to avoid runoff from precipitation.</li> <li>• Do not release heavy discharges of water onto the soil.</li> <li>• Prevent over-watering of loose areas for dust suppression.</li> <li>• Keep site traffic to designated routes.</li> <li>• Consider covering temporary roads and routes within site with either asphalt or stone. Appropriate rehabilitation will need to be applied.</li> <li>• Undertake regular leak monitoring and maintenance of dewatering pipes.</li> <li>• Maintain recommended maximum vehicle weightings to avoid destabilization and subsequent erosion of soil surface.</li> <li>• Progressive rehabilitation of disturbed land or stockpiles by establishing temporary or permanent vegetation supported by irrigation.</li> <li>• Cover excess work areas with geotextile type liners.</li> <li>• Provide collection systems under machinery or equipment during wash down to prevent erosion from runoff.</li> <li>• Flow attenuation - Employ mechanisms to control run off of precipitation such as temporary structures to slow running water to facilitate pollutant removal and infiltration and reduce runoff.</li> </ul>
Sediment Control	Possible sedimentation control measures may include but are not limited to the following:

- Place sediment traps on all drainage lines such as geotextile lining.
- Construct collection channels capable of collecting all runoff water during storms if it contains fine clay particles.
- Use contained concrete washout control facility.
- Treat and discharge runoff water from retention basin at controlled flow rate through storm water discharge network.
- Inspect and clean the collection channels and retention basin on regular basis to prevent sediment build up.
- Stabilise the site as soon as possible after construction

EIAR Chapter 15 – Schedule of Environmental Commitments of Volume 2- the 2022 EIAR (ABP-314686-22) (which is replicated for ease within Appendix A)

Temporary stockpiling of native soils and imported materials onsite will require careful management in order to prevent the release of sediment into drainage ditches (and receiving streams), and any temporarily exposed groundwater (in the unlikely event that groundwater is encountered). The following mitigation measures should be implemented by the Contractor:

- Stripping of topsoil will be carried out in a controlled and carefully managed way and coordinated with the proposed staging for the development. At any given time, the extent of topsoil strip (and consequent exposure of subsoil) will be limited to the immediate vicinity of active work areas. Topsoil stockpiles will be protected for the duration of the works and will be located so as not to necessitate double handling.
- Stockpiled materials should not be located immediately adjacent to any onsite drainage ditches, or any temporarily exposed groundwater (in the unlikely event that groundwater is encountered);
- Stockpiled materials should be covered as required to prevent it spilling over/blowing onto areas of environmental interest or semi-natural vegetation outside the agreed lands;
- Stockpile of materials to be kept to an absolute minimum, and where possible, stockpiled for as short a time as possible prior to use;
- Any stockpiled materials will be stored in low mounds where possible;
- Slopes of material should be stable, and the side slopes compacted down and stabilised, with regular checks by the Contractor;
- The Contractor is to examine the risk arising from storage areas and identify as appropriate the need for mitigation measures at the toe of slopes to reduce silt transport from areas of stockpiled material (in line with IFI best practice guidance);
- Stockpiles of materials not suitable for onsite re-use should be removed as soon as is practicable in accordance with applicable waste management legislation, and under no circumstances to be stockpiled in sensitive ecological areas;
- The Contractor should develop a contingency plan for temporary covering of stockpiles during adverse weather conditions, or other measures as deemed necessary in order to minimise risk of sediment release to watercourses;
- The Contractor should comply with best practice when sourcing imported materials for site works, including NRA (2006) A Guide to Landscape Treatments; and,
- If imported material is required, it must be from a reputable source who can confirm that it has been screened for potential presence of invasive species.

Refer also to relevant mitigation measures Chapter 15 – Schedule of Environmental Commitments of Volume 2- the Main EIAR 2022 (which is replicated for ease within Appendix A of this document). All relevant mitigation measures within the EIAR in relation to the construction and operational phases must be fully implemented.

# 8. Emergency Response Plan

The contractor shall establish, implement and maintain procedures to identify and manage potential environmental emergency situations and potential accidents. The contractor shall respond to actual emergency situations and prevent and mitigate adverse environmental impacts.

The contractor should periodically test, review and update emergency preparedness and response procedures.

## 8.1 Key Requirements

During construction accidents, incidents and emergencies that have an environmental impact may occur. In the event of an emergency, the first response is to locate the source of that which is giving rise to the environmental impact where appropriate and stop continuation of the situation, followed by the containment, control and mitigation of the situation.

The Emergency Response Procedure will be displayed within the Site Office / compound.

A copy of the Material Safety Data Sheets for all the chemicals used on the project site will also be kept at the site office.

The main objectives of the Emergency Response Plan are to:

- Ensure that all means are available to contain the consequences of an accidental spill, fire or release of oil/fuel;
- Ensure that employees are suitably trained to respond to fire and spill;
- Ensure that proper reporting takes place; and
- Ensure that proper investigation is undertaken.

All contractor personnel and sub-contractors will be instructed and rehearsed, as appropriate, in the requirements of the emergency response procedure. Following control of an incident or emergency, an investigation will be conducted, and corrective actions identified and addressed. The Contractor's Environmental Manager will verify the close out of environmental related actions and notify the Employer and/or the Employer's Representative of any emergency.

## 8.2 Emergency Incidents

Emergency incidents are those occurring that rise to significant negative environmental effects including but not limited to the following:

- Any malfunction of any mitigation measure and/or environmental protection system;
- Any emission that does not comply with requirements of the contract and relevant licenses/permits;
- Any circumstance with potential environmental pollution; or
- Any emergency that may give rise to environmental effects (e.g. significant spillages or fire outbreak).

## 8.3 Spill Contingency Plan

The main causes of contamination can occur through:



- Spillage of hazardous material including fuel oils, waste materials or chemicals;
- Spillage of wastewater sewage and other liquid effluents; and
- Spillage of contaminated wash down water with oils, chemicals etc from vehicles, equipment and machinery.

Prior to commencing activities on site, Contractors should develop, implement and maintain a Spill Contingency Management Plan. The Plan should include but not be restricted to the mitigation measures below (Table 8.1).

**In addition, all relevant mitigation measures stipulated within the SHD 2 application for this site area (ABP-314686-22) EIAR Chapter 15 – Schedule of Environmental Commitments of Volume 2- the Main EIAR 2022 (which is replicated for ease within Appendix A of this document) will apply throughout the construction phase, and must be incorporated within the Contractors CEMP.**

**Table 8.1 –Spill Mitigation Measures**

Activity	Mitigation Measures
Mitigation Actions /Emergency Response	<p>Contractors will carry out regular inspections/ audits of hazardous materials usage, handling and storage areas and regular/thorough maintenance of vehicles and hydraulic systems and inspections of sanitary facilities and disposal.</p> <p>All contractors handling hazardous materials will keep appropriate spill cleanup material adjacent to storage and maintenance areas.</p> <p>Minimise the amount of diesel, oil, paint, thinners and other chemicals stored on site that pose potential spillage environmental hazards and use materials that minimize environmental impact such as lead free paints, asbestos free materials etc.</p> <p>Storage areas will be located away from drains/trenches/wastewater collection devices in an impervious bund area (volume of the storage bund &gt;110% of the largest storage tank contained within the bund).</p> <p>Collection systems will be provided/bunded if necessary under machinery or equipment that may leak hydrocarbons/hazardous substances.</p> <p>The contractor shall be responsible for training all staff in the procedures for handling spills and shall provide all staff with appropriate personal protective equipment.</p> <p>The contractor shall provide all staff with appropriate personal protective equipment.</p> <p>Avoid impacting adjacent sites by ensuring all contractors activities, equipment and waste storage is confined to the allocated site boundary.</p> <p>In the event of a spill:</p> <ul style="list-style-type: none"> <li>• Identify and stop the source of the spill and alert people working in the vicinity;</li> <li>• Notify the Environmental Manager immediately giving information on the location, type and extent of the spill so that they can take appropriate action;</li> <li>• If applicable, eliminate any sources of ignition in the immediate vicinity of the incident;</li> <li>• Contain the spill using spill control materials, track mats or other materials as required. Do not spread or flush away the spill;</li> <li>• If possible, cover or bund off any vulnerable areas where appropriate such as drains, watercourses and/or sensitive habitats;</li> <li>• If possible, clean up as much as possible using the spill control materials;</li> <li>• Contain any used spill control material and dispose of used materials appropriately using a fully licensed waste contractor with appropriate permits so that further contamination is limited;</li> <li>• The Environmental Manager shall inspect the site as soon as practicable and ensure the necessary measures are in place to contain and clean up the spill and prevent further spillage from occurring; and</li> <li>• The Environmental Manager will notify the appropriate stakeholders such as Dún-Laoghaire Rathdown County Council, National Parks and Wildlife Service and/or the EPA.</li> </ul>



EIAR Chapter 15 – Schedule of Environmental Commitments of Volume 2- the 2022 EIAR (ABP-314686-22) (which is replicated for ease within Appendix A)

The project specific Detailed CEMP will include an Emergency Response Plan (ERP) based on the Contractor's Risk Assessment, to be reviewed and approved by the Project Ecologist. The ERP will include (but not limited to):

- training of relevant staff, including cover staff, in the implementation of the ERP and the use of spill kits;
- procedures to be undertaken in the event of the release of any sediment into a watercourse, or any spillage of chemicals, fuel, oil or other hazardous materials or wastes;
- procedures to be undertaken in the event of any non-compliance incidents with any permit or licence, or other such risks that could lead to a pollution incident, including flood risks;
- the number, specification and location of all spill kits which shall be carried/kept on the Site;
- information on clean-up and reporting procedures; etc.

While it is expected that the Site drainage system will be installed and commissioned early in the Site construction programme, and will, therefore, be operational for much of the construction phase, there will be a period of the construction phase during which the Site drainage system will not be operational. The project specific Detailed Construction Environmental Management Plan (CEMP) is required to cover this period and to deal with other issues during the construction phase.

Refer also to relevant mitigation measures within Chapter 15 – Schedule of Environmental Commitments of Volume 2- the Main EIAR (which is replicated for ease within Appendix A of this document). All relevant mitigation measures within the EIAR in relation to the construction and operational phases must be fully implemented.

## 8.4 Emergency Incident Response Plan

The Contractor will be required to detail emergency incident procedures in the CEMP and develop an Emergency Incident Response Plan. The Plan will contain emergency phone numbers and method of notifying local authorities, statutory authorities and stakeholder. The Plan will include contact numbers for key personnel. The Contractor will ensure that all staff and personnel on site are familiar with the emergency requirements.

In the case of work required in an emergency, or which if not completed would be harmful or unsafe to workers, the public or to the local environment, Dún-Laoghaire Rathdown County Council will be informed as soon as reasonably practicable of the reasons and likely duration. Examples may include: where the ground needs stabilising if unexpected ground conditions are encountered or equipment failure.

In the event of an emergency incident occurring, the Contractor will be required to investigate and provide a report to include the following, as a minimum:

- A description of the incident, including location, type of incident and the likely receptor;
- Contributory causes;
- Negative effects;
- Measures implemented to mitigate adverse effects; and
- Any recommendations to reduce the risk of similar incidents occurring.

Further, if any sensitive receptor is impacted, the appropriate environmental specialists will be informed and consulted with accordingly.

Any response measures will be incorporated into an updated Emergency Incident Response Plan.



## 8.5 Emergency Access

The Contractor will be required to maintain emergency access routes throughout construction and identify site access points for the working area.

## 8.6 Extreme Weather Events

The Contractor will consider the impacts of extreme weather events and related conditions during construction. The CEMP should consider all measures deemed necessary and appropriate to manage extreme weather events and should specifically cover training of personnel and prevention and monitoring arrangements for staff. As appropriate, method statements should also consider extreme weather events where risks have been identified.



## 9. References

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- Environment (Miscellaneous Provisions) Act 2011, as amended 2015;
- Environmental Noise Regulations 2006, S.I. No. 140 of 2006;
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- European Communities (Environmental Liability) Regulations, 2008, S.I. No. 547 of 2008, as amended, 2011 (S.I. No. 307 of 2011), 2015 (S.I. No. 293 of 2015);



European Communities (Environmental Noise) Regulations 2018 (S.I. No. 549 of 2018);

European Communities (Noise Emission by Equipment for use Outdoors) Regulations, 2001, S.I. No. 632 of 2001, as amended, 2006 (S.I. No. 241 of 2006);

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NRA (2005a). Guidelines for the Crossing of Watercourses during the Construction of National Road Schemes;

NRA (2005b). Guidelines for the Treatment of Badger Prior to the Construction of National Road Schemes;

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Protection of the Environment Act 2003;

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The EU Regulation 2037/2000 (CFC's, HCFC's, Halons) - Ozone Depleting Substances. Control of Substances that Deplete the Ozone Layer Regulations 2006, S.I. No 281 of 2006, as amended, 2011 (S.I. No. 465 of 2011);

The European Communities (Birds and Natural Habitats) Regulations, 2011 (S.I. 477 of 2011), as amended, 2015 (S.I. No. 355 of 2015) and 2021 (S.I. No. 293 of 2021);

The Fisheries (Consolidation) Acts 1959 & 2001

The Forestry Act, 1946, S.I. No. 13 of 1946, as amended, 2009 (S.I. No. 40 of 2009) & Forestry Act, 2014, (S.I. No. 31 of 2014);

The Habitats Directive: Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora;

The National Monuments Act 1930, S.I. No. 2 of 1930, as amended, 2004 (S.I. No. 22 of 2004); and,

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Waste Management (Tyres and Waste Tyres) Regulations 2007 (S.I. No. 664 of 2007), 2017, as amended (S.I. No. 400 of 2017) and 2018 (S.I. No. 96/2018);

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Wildlife Act, 1976 (Protection of Wild Animals) Regulations, 1990, S.I. No. 112 of 1990 and Wildlife Amendment Act, 2000 (S.I. No. 38 of 2000).



# APPENDICES

# **Appendix A. Chapter 15 – Schedule of Environmental Commitments of Volume 2- the Main EIAR 2022 (ABP-314686-22)**

# 15. Schedule of Environmental Commitments

All mitigation and monitoring commitments detailed within this EIAR have been included in a separate compendium and are presented in Table 15-1 and 15-2 below. Together these tables form the Schedule of Environmental Commitments which will be implemented as required during the construction and operational phases of the proposed residential development at Dublin Road, Bray, Co. Wicklow. In addition, the following reinstatement commitments must be fully implemented upon completion of the construction phase:

- All temporary construction compounds and site entrances are to be removed upon completion of the construction phase. Such areas are to be reinstated in accordance with the landscape architects plan and engineer's drawings;
- All construction waste and / or scrapped building materials are to be removed from Site on completion of the construction phase;
- Oil, fuel etc. storage areas are to be decommissioned on completion of the construction phase; and,
- Any remaining liquids are to be removed from Site and disposed of at an appropriately licenced waste facility.

All of the mitigation and monitoring commitments detailed below have been incorporated into the Construction Environmental Management Plan (CEMP) submitted as part of this planning application; this is a live document which will be further added to in the Detailed CEMP prepared by the Contractor and will include any future additional mitigation measures as may be required.

**Table 15-1 – Schedule of Environmental Commitments – Mitigation Measures (Construction and Operational Phases)**

Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Mitigation Measures	Construction Phase	Operational Phase
1	Chapter 3 – Population and Human Health	<p>During the construction phase, all legal duties under the Construction Regulations (Safety, Health and Welfare at Work (Construction) Regulations 2013) will be adhered to. In accordance with these duties, a Project Supervisor Design Process (PSDP) will be appointed by the relevant contractor to co-ordinate the design effort and minimise the construction risks during the design period. In addition, a Project Supervisor - Construction Stage (PSCS) will be appointed to coordinate and supervise all safety aspects of the project.</p> <p>The CEMP (document ref.: 5214419DG0005) for the project which accompanies this planning application, sets out the basic measures to be employed in order to mitigate potential negative effects during construction. This document represents a comprehensive approach to construction phase mitigation which in accordance with good practice, will be refined and added to as the project proceeds on Site. The CEMP includes the following with regard to population and human health.</p> <p><i>“A rodent and pest control plan will be put in place so as to manage and limit any potential disturbance to populations that may utilise the Site. The pest control plan will be in accordance with the Chartered Institute of Environmental Health’s “Pest minimisation Best practice for the construction industry” guidelines or a similar appropriate standard.”</i></p> <p>Procedures shall also be adopted to ensure that noise impacts from construction operations are minimised, to protect local amenity as detailed in Chapter 7 - Noise and Vibration. The proposed mitigation measures to minimise noise impacts during the construction phase are detailed in Section 7.7.1 in Chapter 7 – Noise and Vibration. Prior to the commencement of construction, the CEMP will be refined by the selected contractor prior to work commencing on Site.</p> <p>The main purpose of a CEMP is to provide a mechanism for implementation of the various mitigation measures which are described in this EIAR and contained within the CEMP that accompanies this application under separate cover.</p> <p>All personnel will be required to understand and implement the requirements of the CEMP and shall be required to comply with all legal requirements and best practice guidance for construction sites.</p> <p>There are a number of existing significantly scaled open spaces available for use by walkers and dog walkers in the local environs including, Bray Promenade and Beach, the People’s Park and Corke Abbey Valley Park.</p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	

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1	Chapter 3 – Population and Human Health	<p>Mitigation measures will be implemented during the detailed design, and construction phase, and are detailed in full in the following sections of this EIAR: Chapter 6 – Air Quality and Climate; Chapter 7 – Noise and Vibration; and Chapter 9 – Land, Soils and Geology.</p> <p>Adherence to the construction phase mitigation measures presented in this EIAR will ensure that the construction of the proposed development will have an imperceptible and neutral impact in terms of health and safety.</p>	<p>✓</p> <p>✓</p>	
		<p>Mitigation measures will be implemented during the detailed design and construction phase, as described in full in Chapter 9 – Land, Soils and Geology, to remove the potential identified risk during the operational phase to human health receptors (i.e. new residents) through ingestion of naturally occurring barium in soils in two localised hotspots in the vicinity of the proposed housing / duplex units. Accordingly, no significant human health impacts are likely to arise during the operational phase of the proposed development.</p> <p>There are a number of existing significantly scaled open spaces available for use by walkers and dog walkers in the local environs including, Bray Promenade and Beach, the People’s Park and Corke Abbey Valley Park. In addition the operational site will provide new routes connecting existing public spaces for use by all and proposed public open space.</p>		<p>✓</p> <p>✓</p>
2	Chapter 4 – Biodiversity	<p>The appointed Contractor shall ensure specialist ecological surveying is undertaken where required i.e. mammal surveys, bat surveys, and nesting bird surveys as detailed further below. Construction phase ecological mitigation measures shall be developed and undertaken in coordination with ecological specialists (i.e. bat specialist and suitably qualified ecologist) as required.</p> <p><b>Protection of Sites Designated for Nature Conservation</b></p> <p>Protection of sites designated for conservation, and the features of interests associated with designated sites, is through prevention of potential impacts to the aquatic environment during the construction phase.</p> <p>Mitigation measures as set out in Chapter 9 – Land, Soils and Geology; and Chapter 10 – Water will be implemented during the Construction phase.</p> <p>Works will follow best practice guidance as outlined in <i>Guidelines on the Protection of Fisheries during Construction Works in and Adjacent to Waters</i> (IFI, 2016).</p> <p><b>Mitigation of habitat loss/damage during construction</b></p> <p>Hedgerows, treelines and boundary woodland areas are to be retained on-site; Site boundaries will be protected from any accidental damage during construction by means of exclusion through use of fencing. All trees, including cypresses, along the northern boundary</p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	

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2	Chapter 4 – Biodiversity	<p>will be retained with only unsafe trees being removed during the construction phase. This is set out in full in the accompanying Tree Survey Report and Landscape Planting Plan. Measures will be taken to ensure that trees and hedges being retained are incorporated into the development without being impacted upon. Protective fencing will be provided around retained trees and hedgerows and fencing will be erected so as to encompass the Root Protection areas (RPAs) of trees and hedgerows. The fencing will be at least 2m high and constructed in accordance with the RPA outlines in the Tree Survey Report (Appendix 5.2). Similarly, a buffer is to be maintained between the Site and neighbouring woodland to prevent negative impacts to woodland during construction.</p> <p>Site clearance of potential bird nesting habitat is detailed below. Site clearance of potential bat roost habitat is detailed below.</p> <p>To compensate for the loss of woodland substantial native tree and hedgerow planting will be planted on the Site and existing hedges which are to be retained will be reinforced with native planting. This will reduce the impact of the proposed development upon habitats in the area and there will be no significant operational impact upon habitats due to the provision of substantial native and pollinator friendly habitats proposed for the Site (refer to Landscape Planting Plan Drawings Nos. 6948_L-2000 &amp; 2002). Landscape enhancement measures are outlined in greater detail below in Section 4.5.1.10.</p> <p><b>Bats</b></p> <p><b>Loss of Foraging and Commuting Habitat</b></p> <p>Loss of commuting and foraging habitat at the Site will be mitigated by the landscaping proposals, which include hedgerow planting, wildflower and woodland planting. Planting schemes should ensure connectivity to linear/ woodland habitats in the wider landscape. It is noted that the landscaping proposals also include retention of hedgerow and boundary treeline and the planting of hedgerow where none is currently in situ. Trees that are being retained in the Site shall be protected during clearance and construction works in line with current guidelines e.g. British Standard 5837:2012 and National Roads Authority 2006a.</p> <p><b>Lighting</b></p> <p>To minimise disturbance to bats and other fauna (badger and otter) that are roosting/resting or active at night, no construction operations will be undertaken during the hours of darkness. If construction lighting is required during the bat activity period (dusk April to September), lighting shall be directed away from all hedgerow/ treeline habitats to be retained. This can be achieved by using directional lighting (i.e. lighting which only shines on the proposed works and not nearby countryside) to prevent overspill.</p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	

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2	Chapter 4 – Biodiversity	<p><b>Bat Conservation Plan and Bat Roosts</b></p> <p>A Bat Conservation Plan has been developed for the construction phase of the proposed development. The Bat Conservation Plan is included in Appendix 4.3 of this document. The Contractor will appoint a bat specialist prior to construction activities to supervise and implement the Bat Conservation Plan. The Bat Conservation Plan includes the following commitments; all trees noted to have potential bat roosting habitat will be surveyed by the appointed bat specialist prior to Site clearance works and if roosts are found the bat specialist will develop a method statement for the tree / roost clearance in consultation with the planning authority and NPWS and will seek the necessary derogation licence from local NPWS staff (if required). The Bat Conservation Plan also includes for the surveying and protection of existing bat roosts identified in the 2 no. oaks trees located on the former golf clubs lands outside of the Site boundary (refer to Appendix 4.3 for Bat Conservation Plan).</p> <p>Whilst there will be a loss of a number of trees which have the potential to have bat roosts, the design of the development includes for the installation of 36 no. bat boxes to act as summer and winter roosting sites. The installation of bat boxes will include 14no. winter bat boxes and 14 no. summer bat boxes to be installed within boundary landscaped areas and 8 no. bat tubes installed within walls around the pumping station (Refer to Landscape Masterplan for locations). The installation of bat boxes will be supervised and overseen by the appointed bat specialist. The landscape design also includes for the planting of native tree species which will in time provide for further potential roosting site habitat.</p> <p><b>Birds</b></p> <p>Removal of nesting habitat (hedgerows, scattered trees and woodland utilised by local and common bird species) will be carried out outside the breeding bird season from 1<sup>st</sup> March to 31<sup>st</sup> August inclusive. Where nesting habitat clearance cannot be avoided during this period the NPWS will be consulted in advance and if, in consultation, it is deemed necessary then a suitably qualified ecologist will be appointed by the Contractor to oversee clearance of nesting habitat and ensure the area is free of nesting birds. The appointed ecologist will develop a method statement for the nesting habitat clearance in consultation with local NPWS staff. The comprehensive landscaping design calls for the planting of native trees and plant species suitable for pollinating insect species. The landscape design also includes for gorse planting which will provide for habitat suitable for stonechat. The landscape design should provide for a net gain in suitable bird nesting and foraging habitat. The landscaping design has followed the principles outlined in the All-Ireland Pollinator Plan 2021-2025.</p>	<p>✓</p> <p>✓</p> <p>✓</p>	

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2	Chapter 4 – Biodiversity	<p data-bbox="560 217 808 240"><b>Terrestrial mammals</b></p> <p data-bbox="560 260 1659 596">During the construction phase the Contractor will adhere to the ‘<i>Guidelines for the Treatment of Badgers prior to the Construction of National Road Schemes</i>’ (NRA 2006). The Site and all areas within 150m around the perimeter of the Site will be resurveyed for badger activity and the presence of setts by a suitably qualified ecologist (appointed by the Contractor) prior to the commencement of construction activities. Should an active sett be noted within the Site or survey area, NPWS will be informed and consulted. The suitable qualified ecologist will develop a method statement in agreement with NPWS for construction activities near an active badger sett. Method statement for works near an active sett will include; there shall be no blasting or pile driving within 150m of an active sett during the breeding season (December to June) or construction works within 50m of such an active sett during the breeding season.</p> <p data-bbox="560 616 1659 916">The creation of an ecological buffer zone along the northern and eastern boundaries of the Site will allow for connectivity of habitats and the continuance of the site to be used as a badger foraging area. The buffer zone allows for connectivity between Rathmichael woodlands/stream and the railway underpass which leads to scrub habitat and Woodbrook Golf Club lands which are known to be badger foraging territory. During the construction phase no works will be undertaken during night time hours and as such the construction activities will not take place whilst local badgers are foraging. During the construction phase an access track will be in situ along the northern and eastern boundaries which will allow for continued connectivity from Rathmichael woodlands to the railway underpass and to the important foraging habitats to the east of the railway line.</p> <p data-bbox="560 935 1659 986">During the construction phase the following standard management and protection measures will be implemented during the construction works and monitored by the project ecologist:</p> <ul data-bbox="560 1005 1659 1337" style="list-style-type: none"> <li data-bbox="560 1005 1659 1098">• No excavations are to be left uncovered overnight or without a means of egress (e.g. a ramp or sloped plank) to prevent badgers from falling in or entering in search of food and becoming trapped;</li> <li data-bbox="560 1114 1659 1177">• No buildings or storage units are to be left open overnight to prevent badgers from entering in search of food and becoming trapped;</li> <li data-bbox="560 1193 1659 1257">• All food waste is to be properly secured and disposed of to avoid attracting badgers to the Site;</li> <li data-bbox="560 1273 1659 1337">• No toxic, poisonous or potentially harmful substances or materials are to be left unsecured overnight; and,</li> </ul>	<p data-bbox="1671 405 1704 437">✓</p> <p data-bbox="1671 724 1704 756">✓</p> <p data-bbox="1671 1011 1704 1043">✓</p> <p data-bbox="1671 1107 1704 1139">✓</p> <p data-bbox="1671 1203 1704 1235">✓</p> <p data-bbox="1671 1283 1704 1315">✓</p>	

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2	Chapter 4 – Biodiversity	<ul style="list-style-type: none"> <li>Should any new badger setts or mammal burrows be discovered within the Site or immediately adjoining areas the project ecologist is to be contacted for immediate inspection, advice and liaison with NPWS as necessary.</li> </ul> <p><b>Prevention of pollution to surface waters</b></p> <p>Mitigation measures as set out in Chapter 9 – Land, Soils and Geology; and Chapter 10 – Water will be implemented during the Construction phase.</p> <p>Works will follow best practice guidance as outlined in <i>Guidelines on the Protection of Fisheries during Construction Works in and Adjacent to Waters</i> (IFI, 2016).</p> <p><b>Invasive species prevention</b></p> <p>No legally restricted invasive species, such as Japanese knotweed, were found onsite. Strict bio-security protocols will be implemented during the construction phase so as to ensure no imported materials potentially contaminated with invasive plant species are brought to Site. All imported soil materials will be visually inspected by the Contractor’s ecologist for signs of invasive plant contamination (such as root fragments, rhizome material) prior to arrival on Site.</p> <p><b>Disturbance of faunal species mitigation</b></p> <p>Removal of nesting habitat (hedgerows, scattered trees and woodland) will be carried out outside the breeding bird season from 1<sup>st</sup> March to 31<sup>st</sup> August inclusive. Where nesting habitat clearance cannot be avoided during this period the NPWS will be consulted in advance and if, in consultation, it is deemed necessary then a suitably qualified ecologist will be appointed by the Contractor to oversee clearance of nesting habitat and ensure the area is free of nesting birds. The appointed ecologist will develop a method statement for the nesting habitat clearance in consultation with local NPWS staff.</p> <p><b>Additional Construction Phase Ecological Mitigation Measures</b></p> <p>With regard to potential impacts on ecological features the following mitigation measures are proposed:</p> <ul style="list-style-type: none"> <li>The Contractor shall engage a suitably experienced and qualified ecologist and/or specialist ecologist to undertake the required ecological surveying prior to construction activities. Pre-construction ecological surveys should include; terrestrial mammal surveys, bat roost surveys and breeding bird surveys (breeding bird surveys will be required if vegetation clearance is to be undertaken within nesting season 1<sup>st</sup> March – 31<sup>st</sup> August);</li> </ul>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	

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2	Chapter 4 – Biodiversity	<ul style="list-style-type: none"> <li>• The Contractor shall employ good practice environmental and pollution control measures with regard to current best practice guidance such as Environmental Good Practice On-site Guide (CIRIA, 2018);</li> <li>• The construction management of the Site will take account of the recommendations of the Construction Industry Research and Information Association (CIRIA) guides ‘Control of Water Pollution from Construction Sites’ and ‘Groundwater control - design and practice’ to minimise as far as possible the risk of pollution;</li> <li>• All of the mitigation measures for the protection of soils listed in Chapter 9 will be implemented onsite during the construction phase;</li> <li>• The Contractor shall take all necessary precautions to prevent potential impact upon aquatic species of the River Dargle from construction activities. The mitigation measures for prevention of potential surface water impacts as detailed in Water Chapter 10 shall be implemented;</li> <li>• The Contractor shall take all necessary precautions to prevent potential impact upon aquatic species of the River Dargle via the local groundwater body. All groundwater mitigation measures as outlined in Chapter 10 - Water shall be implemented; and,</li> <li>• The Contractor shall take all necessary precautions to prevent potential impact upon habitats and species from dust generated during the construction phase. All air quality mitigation measures as outlined in Chapter 11- Air Quality &amp; Climate shall be implemented.</li> </ul> <p>The above mitigation measures will form part of the Construction Environmental Management Plan (CEMP) submitted as part of this planning application, and which will be further added to by the Contractor within the project-specific Detailed CEMP which will be in operation during the construction phase.</p> <p><b>Design Measure Mitigation</b></p> <p><b>Landscaping</b></p> <p>A comprehensive landscaping design has been developed for the Site which will include for additional boundary planting and the creation of an ecological buffer zone along the northern and eastern boundaries of the Site. In line with DLRCC and WCC Biodiversity Action Plans and the All Ireland National Pollinator Plan and in order to create a biodiversity net gain at the Site the landscaping plan will include areas of ecological enhancement such as substantial areas of native tree planting and wild flower areas. The planted areas will link with the</p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	



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2	Chapter 4 – Biodiversity	<ul style="list-style-type: none"> <li>• Hedgerows will include a range of different species to provide food throughout the year, for example blackthorn for early season nectar; hawthorn and bramble for summer flowers and autumn berries; ivy for autumn nectar and later winter berries;</li> <li>• Flowers that vary in colour, fragrance, shape, amount of nectar and time of flowering;</li> <li>• Pale flowers that are more easily seen in poor light, so attracting insects at dusk;</li> <li>• Single flowers, which tend to produce more nectar than double varieties; and</li> <li>• Flowers with insect-friendly landing platforms and short florets, like those in the daisy families.</li> </ul> <p>Other enhancement measures include:</p> <ul style="list-style-type: none"> <li>• Bat roost boxes on mature trees and integrated bat boxes built into structures are included as biodiversity enhancement measures. 14 no. Rocket Bat boxes are to be installed in the dark zones within northern woodland and treeline habitats. These will be free standing chambers on free standing poles. 14 no. Summer Bat Boxes (1FF Schwegler woodcrete or similar design) will be erected within the treeline on the northern boundary of the Site. In the area of the pumping station (south east of the Site), 8 no. bat tubes to be installed within this structure. These are specifically designed boxes that provided alternative roosting for bats.</li> </ul> <p><b>Birds</b></p> <p>Within the landscape plan wildflowers, shrubs and trees which have the potential to support foraging populations of birds are proposed in the landscape plan and include (non-exhaustive list): -</p> <ul style="list-style-type: none"> <li>• Gorse (<i>Ulex europaeus</i>)</li> <li>• Hawthorn (<i>Crataegus monogyna</i>)</li> <li>• Holly (<i>Ilex aquifolium</i>)</li> <li>• Rowan/Mountain Ash (<i>Sorbus aucuparia</i>)</li> <li>• <i>Agapanthus africanus</i></li> <li>• <i>Alchemilla mollis</i></li> <li>• <i>Achillea millefolium</i></li> </ul>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	

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2	Chapter 4 – Biodiversity	<ul style="list-style-type: none"> <li>• <i>Armeria maritima</i></li> <li>• <i>Rudbeckia fulgida</i></li> </ul> <p>The development design also includes for 10 no. bird nesting boxes to be erected in the woodland area to the northwest of the Site as well as along the ecological buffer zone along the northern and eastern boundaries of the Site.</p> <p><b>Invertebrates</b></p> <p>The Landscape design for the proposed development includes for the creation of wildflower areas to incorporate plant species which will attract pollinating insects. The installation of 10 no. insect hotels will also form part of the wildflower landscaping measures and these insect boxes will allow for insects to establish and have refuge in the landscaped areas.</p> <p>The planting schedule contains a mix of native plant species and emphasis has been placed on adhering to the objectives outlined in the All-Ireland Pollinator Plan 2021-2025 with the aim of planting species which are beneficial to pollinator species. Pollinator beneficial plant species include (non-exhaustive list): -</p> <ul style="list-style-type: none"> <li>• <i>Nepeta</i> ‘Walker Low’</li> <li>• <i>Salvia nemorosa</i></li> <li>• <i>Lavandula angustifolia</i></li> <li>• <i>Achillea millefolium</i></li> <li>• <i>Armeria maritima</i></li> <li>• Hemp Agrimony</li> <li>• Black Meddick</li> <li>• Musk mallow</li> <li>• Wild primrose</li> <li>• Hedge woundwort</li> </ul> <p>In addition, the roof level of apartment blocks will be developed into green spaces to have a mix of sedum and wildflowers to further benefit pollinating species. There are 11,980m<sup>2</sup> of green roof spaces within the design. Insect hotels are to be placed within these roof garden areas (Refer to Landscape Planting Plan Drawing No.6948-L-2002).</p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	

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2	Chapter 4 – Biodiversity	<p>The following operational mitigation measures will be implemented either through the design of the proposed development (e.g. lighting, foul drainage, landscaping etc.), or by those in charge of maintenance and management of the development.</p> <p><b>Lighting</b></p> <p>The design of the lighting within and around the proposed development has been designed to be cognisant of minimising effects on local nocturnal species, such as bats and badgers, and has been developed so as to allow for a dark ecological corridor around the northern and eastern boundary of the Site. The lighting scheme for the Site has been developed with the following principals; only illuminating what needs to be illuminated (e.g. light directed to the path only), reducing night time light levels, reducing the height of the luminaires, shielding of luminaires and correct choice of light (e.g. a warm white spectrum &lt;2700 Kelvins).</p> <p>Project specific lighting designs include for:</p> <ul style="list-style-type: none"> <li>• All luminaires shall lack UV/IR elements to reduce impact;</li> <li>• LED luminaires shall be used due to the fact that they are highly directional, have lower intensity, have good colour rendition and dimming capability;</li> <li>• A warm white spectrum &lt;2700 Kelvins shall be used to reduce the blue light component of the LED spectrum;</li> <li>• Luminaires shall feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats;</li> <li>• Column heights shall be carefully considered to minimise light spill. The shortest column height allowed shall be used where possible. Ca. 5.5m or less;</li> <li>• Bollard lighting shall be used for pedestrian and greenway areas, if lighting is deemed necessary;</li> <li>• Only luminaires with an upward light ratio of 0% and with good optical control shall be used;</li> <li>• Luminaires shall be mounted on the horizontal, i.e. no upward tilt;</li> <li>• Any external security lighting shall be set on motion-sensors and short (1min) timers; and,</li> <li>• The intensity of external lighting shall be limited to ensure that skyglow does not occur in order to reduce light pollution.</li> </ul>		<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>

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2	Chapter 4 – Biodiversity	<p>The lighting scheme has been designed in accordance with guidance contained in; <i>Institution of Lighting Professionals; Guidance Note 08/18; Bats and artificial lighting in the UK</i> (ILP 2018). The lighting design has been reviewed by a bat specialist and recommendations have been incorporated into the design. A lighting design review letter, as provided by bat specialist Dr Tina Aughney (2022), is provided in Appendix 4.2.</p> <p><b>Surface water drainage</b></p> <p>Sustainable drainage (SuDS) is also a key focus for the entire design of the development. Along with permeable paving for parking areas, the landscape design includes for attenuation areas throughout the development by channelling runoff to planted areas and tree pits. This has the added benefit of reducing surface water runoff rates. In addition, planted swales will be created to aid with storm water flow and these planted areas will contain suitably water tolerant plant species. The roof areas which will include sedum and wildflower green roof treatments will further slowdown the flow of water from areas that traditionally contribute to high runoff flow rates during rainfall events. SuDS features are also outlined as mitigatory measures in the accompanying NIS (Atkins document reference; 5214419DG0006).</p> <p><b>Foul Disposal</b></p> <p>Mains infrastructure for foul sewage disposal has been designed in accordance with Irish Water Code of Practice. All wastewater streams will be collected within the local foul water network and will be transferred to Shanganagh Wastewater Treatment Plant (WWTP). Irish Water has confirmed that the existing foul network has sufficient capacity to meet the wastewater discharge volumes expected from the proposed development, once operational.</p> <p><b>Landscaping Establishment</b></p> <p>The landscape design calls for an ecological buffer zone around the northern and eastern boundaries of the Site. This planted buffer zone will ensure the area provides for bat flight lines and badger foraging connectivity to/from the ecological features to the north (Rathmichael woodlands), east (scrub habitat and golf club lands) and south (River Dargle and remainder of former Bray Golf Club lands). Once operational the implementation of the landscape plan and compensatory habitat such as wild flower meadows and additional planting will be inspected by the Contractor within one year post planting. If measures have failed due to lack of management an alternative solution will be proposed by the Contractor. Operational phase monitoring (in order to ensure the continued success of the landscape features, specifically in relation to biodiversity enhancement measures) shall be undertaken by those in charge of the maintenance and management of the development.</p>		<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>

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2	Chapter 4 – Biodiversity	<p><b>Refuge Habitats</b></p> <p>The design of the development calls for the installation of numerous bird nesting boxes, bat roosting boxes and insect boxes. Refuge boxes will be checked and maintained to ensure they do not fall into disrepair. It is recommended that bird boxes are checked and cleared of remnant nests during the winter season (as required). Operational phase monitoring in order to ensure the success of the refuge habitats shall be undertaken by those in charge of the maintenance and management of the development.</p>		✓
3	Chapter 5 – Landscape and Visual	<p>Due to the nature of construction, it is inevitable that adverse effects will occur to the landscape and visual amenity in the immediate area. The significance of these temporary effects will be limited by implementing the following measures:</p> <ul style="list-style-type: none"> <li>• Construction methods and procedures should accord to an agreed <ul style="list-style-type: none"> <li>- Construction Method Statement</li> <li>- Construction Management Plan</li> <li>- Construction Environmental Management Plan</li> <li>- Earthworks/materials Management Plan</li> <li>- Detailed design of drainage, including SuDs, water and sewerage disposal to mitigation against flooding, discharge of storm/surface waters with potential pollution discharge, increase of silt and sediment from construction works</li> <li>- Construction impact assessment to mitigate against dust pollution, noise and light pollution.</li> </ul> </li> <li>• Phasing to assimilate changes into the landscape;</li> <li>• Temporary hoarding erected around construction areas to clearly delineate working areas and protect the public from the works. This will reduce visual effects on adjoining roads and pedestrian paths;</li> <li>• Publicity materials may be displayed on the hoardings to inform the public and passers-bys about the proposed development;</li> <li>• Advance planting and retention of key woodland areas.</li> </ul> <p><b>Design Considerations</b></p> <ul style="list-style-type: none"> <li>• The external and internal network including roads, cycle lanes, parking areas, footpaths and kerbs, pedestrian crossings and car parking will be constructed to avoid traffic congestion in the vicinity. It will also improve permeability and connectivity from, for</li> </ul>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	

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3	Chapter 5 – Landscape and Visual	<p>instance Corke Abbey Valley Park and Corke Abbey and the adjacent school development through to Bray Harbour, Promenade and town centre.</p> <ul style="list-style-type: none"> <li>• The design, finishes of buildings will draw reference and inspiration from the existing traditional town centre with the development flowing from ‘old’ to ‘new’ and matching in scale, format and design.</li> <li>• Public and Communal open space is overlooked and dispersed throughout the scheme with a strong visual and functional relationship with the scheme. The maintenance responsibilities for all public open space areas will be the responsibility of the development Management Company to ensure all mitigation measures contained within these areas are fully maintained over a long-term basis to ensure they provide the maximum required impact.</li> <li>• The development has a series of new public open spaces including the Market Square incorporating space for artisan markets, seasonal community events and commercial ventures providing an element of social, community and residential services and The Orchard area with a multi-sports ball court and dog exercise area. Natural play areas will be developed within the open space areas to provide focal points along walking routes.</li> <li>• To increase biodiversity and wildlife habitats, the roof level of the apartment blocks will be planted with a mix of sedum and wildflowers to increase wildlife habitats. In addition, bird and bat boxes will be fixed to existing trees or on stand alone poles throughout the scheme and insect hotels will be introduced in wild flower meadow areas and on roofs.</li> <li>• The streets will be tree lined providing enclosure and a sense of place. Footpaths will be designed to encourage walking and cycling and seating areas will encourage social interaction and a sense of community.</li> <li>• Sustainable drainage is a key focus of the landscape treatment for the entire development. Along with permeable paving for parking areas, attenuation areas in the form of planting beds, tree pits and green roofs are incorporated into the landscape proposals.</li> <li>• The positioning of the roads and residential blocks have been arrayed so that they form a spatial marker (or morphological memory) of the ‘Nun’s Walk’ former location and alignment. The Nun’s walk will feature and be defined by engraved paving slabs laid through the public open space area located between apartment blocks A and B to echo the alignment of this linear earthwork along with the alignment of the boundary between Dublin and Wicklow. This feature will run through the paved area that also provides drop off access to the entrance of Block A. The space also allows for the potential installation</li> </ul>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	

Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Mitigation Measures	Construction Phase	Operational Phase
3	Chapter 5 – Landscape and Visual	<p>of public artwork to further define the character and mark the history of the space, including delineation of the alignment of the earthwork through paving, interpretive text and imagery. In addition, the design provides for a feature stone wall along this section of the railway boundary to act as ‘stage scenery’ and reinforce the importance of this area of open space. This open space will provide connectivity with the Green Spine and the Coastal Gardens character areas to maintain pedestrian permeability throughout the development. The Landscape Design also provides for high quality surface materiality - refer to the Landscape Design Strategy Report and Cultural Heritage Chapter for further information.</p> <ul style="list-style-type: none"> <li>• Whilst the public can enjoy the variety of spaces in the proposed development including the Market Square adjacent to apartment Block C, the Woodland Park on the northern boundary which provides a link to the existing adjacent Corke Abbey Valley Park; the Coastal Gardens which run along the eastern boundary of the site and link Corke Abbey Valley Park with the existing riverside pathway and cycle path to Bray Harbour; the Riverside Park – a new parkland area adjacent to the River Dargle in the south eastern corner of the Site; the Green Spine through the centre of the site which links with the Woodland Park and Coastal Gardens and provides access to apartment Block A; the Orchard on the existing underground Irish Water foul storage tank site at the site entrance, there are also semi-private communal amenity areas in the podium gardens of the apartment Blocks A, B and C and a communal woodland garden for the residents of apartment Block D. All houses, duplex units and apartments will also avail of private open space to the required standards.</li> <li>• The residential housing will incorporate car parking spaces. Car parking for the apartment blocks will be at the centre of the ground floor level enclosed by the creche, café, retail outlets, and services such as refuse area, cycle parking and other plant services.</li> </ul> <p><b>Landscape Design</b></p> <ul style="list-style-type: none"> <li>• The landscape design comprises of the following outdoor spaces: <ul style="list-style-type: none"> <li>- Home Zone – tree lined streets that provide shade and privacy to pedestrians and residents, SuDs integrated into planting schemes to enhance biodiversity in an urban setting, wide footpaths to encourage walking and cycling, seating area and car parking (not dominating space).</li> <li>- Private and communal gardens;</li> <li>- Play/recreation/leisure;</li> </ul> </li> </ul>	<p>✓</p> <p>✓</p> <p>✓</p>	3

Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Mitigation Measures	Construction Phase	Operational Phase
3	Chapter 5 – Landscape and Visual	<ul style="list-style-type: none"> <li>- General landscape/public amenity/park;</li> <li>- Boundary treatments</li> <li>- Open space for areas for outdoor commercial opportunities; tables and seating and market.</li> <li>• Proposed habitats include: <ul style="list-style-type: none"> <li>- Woodland;</li> <li>- Hedgerows;</li> <li>- Shrub and herbaceous planting;</li> <li>- Amenity grass;</li> <li>- Meadow planting;</li> <li>- Green roofs – incorporating sustainable urban drainage within sedum planting;</li> <li>- Bat, bird and insect boxes/hotels.</li> </ul> </li> <li>• The proposed development will retain existing trees where possible and maintain strong native boundary planting to ensure existing wildlife corridors are retained, particularly along the northern, eastern and western boundaries of the site. It is intended to retain the hedgerow along the northern boundary and include additional planting along the entire boundary.</li> <li>• The landscape planting design provides for a net gain in number of trees within the Site. There are ca. 380no. standard sized trees included within the proposed design.</li> <li>• The north west corner of the site is densely stocked with existing conifers and poplar trees, some of which will need to be removed to facilitate the construction of Block D – refer to Appendix 5.2. It is proposed to create a woodland setting across the northern boundary, which will help to integrate Block D in the landscape and provide screening from the adjacent residential development on Corke Avenue.</li> <li>• Plans include a connection with Corke Abbey Valley Park and access routes through to Corke Abbey Valley Park, all subject to agreement with DLRCC.</li> <li>• The Coastal Gardens border the eastern side of the proposed development and run parallel with the railway line. They incorporate a combined footpath and cycleway, with play provision dispersed along the path leading to the existing railway underpass and a link to Bray town centre, the popular walk from Bray seafront to Greystones and the future East Coast Trail along with a connection to the Dargle Riverside Walkway.</li> </ul>	<p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p>	3

Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Mitigation Measures	Construction Phase	Operational Phase
3	Chapter 5 – Landscape and Visual	<ul style="list-style-type: none"> <li>• Native planting to the Coastal Gardens bordering the railway boundary will create a green corridor and also soften the façade of Blocks A and B from views from the Harbour Wall and coastal path. Part of this boundary will incorporate a feature stone wall of approximately 22m.</li> <li>• A Green Spine runs through the centre of the northern half of the proposed development and links into the Woodland Setting. This incorporates footpaths, green spaces and pocket parks uniting the residential area, providing new habitat creation and Sustainable Urban Drainage.</li> <li>• Creation of the following habitats are included as biodiversity enhancement measures: <ul style="list-style-type: none"> <li>- 14no. Rocket Bat Boxes – free-standing chamber on free standing poles - will be provided in dark zones within woodland and treeline habitats;</li> <li>- 14no. summer bat boxes will be provided on mature trees;</li> <li>- existing pumping station screened with feature stone walls with 8no. interconnecting bat tubes;</li> <li>- 20no. bird nesting boxes attached to existing trees or on standalone poles including 2no. swift nesting boxes along the northern boundary and 10 no nesting boxes on the eastern boundary;</li> <li>- 10 no. insect hotels to be provided in wild flower meadow areas and on roofs.</li> </ul> </li> <li>• Hard landscaping materials have been chosen based on suitability for a residential scheme and long-term use with variations provided in the form of shape, unit size, mix and colour. All of the specified materials are robust in nature in order to maximize the longevity of the development and minimise maintenance issues.</li> </ul> <p>Root protection in accordance with BS 5837:2012 will be applied to the existing trees to be retained to ensure ongoing viability – refer to 6948-L-0001 – Vegetation Development Impact. All recommendations for tree removal due to poor condition will also be followed to maintain the ongoing safety of the site.</p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	3
4	Chapter 6 – Air Quality and Climate	<p><b>Air Quality</b></p> <p>The pro-active control of fugitive dust will ensure the prevention of significant emissions, rather than an inefficient attempt to control them once they have been released. The main contractor will be responsible for the coordination, implementation and ongoing monitoring of the Dust Management Plan. The key aspects of controlling dust are listed below. Full details of the Dust Management Plan can be found in Appendix 6.3. These measures have been</p>	<p>✓</p>	

Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Mitigation Measures	Construction Phase	Operational Phase
4	Chapter 6 – Air Quality and Climate	<p>incorporated into the Outline Construction Environmental Management Plan (CEMP) prepared for the site.</p> <p>In summary the measures which will be implemented will include:</p> <ul style="list-style-type: none"> <li>• Hard surface roads will be swept to remove mud and aggregate materials from their surface while any un-surfaced roads will be restricted to essential site traffic;</li> <li>• Any road that has the potential to give rise to fugitive dust must be regularly watered, as appropriate, during dry and/or windy conditions;</li> <li>• Vehicles exiting the site shall make use of a wheel wash facility where appropriate, prior to entering onto public roads;</li> <li>• Vehicles using site roads will have their speed restricted, and this speed restriction must be enforced rigidly. On any un-surfaced site road, this will be 20 kph, and on hard surfaced roads as site management dictates;</li> <li>• Public roads outside the site will be regularly inspected for cleanliness and cleaned as necessary;</li> <li>• Material handling systems and site stockpiling of materials will be designed and laid out to minimise exposure to wind. Water misting or sprays will be used as required if particularly dusty activities are necessary during dry or windy periods; and,</li> <li>• During movement of materials both on and off-site, trucks will be stringently covered with tarpaulin at all times. Before entrance onto public roads, trucks will be adequately inspected to ensure no potential for dust emissions.</li> </ul> <p>At all times, these procedures will be strictly monitored and assessed. In the event of dust nuisance occurring outside the site boundary, movements of materials likely to raise dust would be curtailed and satisfactory procedures implemented to rectify the problem before the resumption of construction operations.</p> <p><b>Climate</b></p> <p>Construction stage traffic and embodied energy of construction materials are expected to be the dominant source of greenhouse gas emissions as a result of the construction phase of the proposed development. Construction vehicles, generators etc., may give rise to some CO<sub>2</sub> and N<sub>2</sub>O emissions. However, due to short-term nature of these works, the impact on climate will not be significant. Nevertheless, below are some Site-specific mitigation measures can be implemented during the construction phase of the proposed development to ensure emissions are reduced further;</p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	

Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Mitigation Measures	Construction Phase	Operational Phase
4	Chapter 6 – Air Quality and Climate	<ul style="list-style-type: none"> <li>The prevention of on-site or delivery vehicles from leaving engines idling (even over short periods),</li> <li>Minimising waste of materials due to poor timing or over ordering on site (to minimise the embodied carbon footprint of the site).</li> </ul>	<p>✓</p> <p>✓</p>	
		<p>The proposed development has been designed to minimise the impact to climate where possible during operation. Details of the measures to be incorporated into the design of the development are outlined in Section 6.5.2 and within the Building Lifecycle Report prepared in support of this planning application. The impact of the proposed development on air quality and climate is predicted to be direct and imperceptible with respect to the operational phase in the long term. Therefore, no site specific mitigation measures are required.</p>		<p>✓</p>
5	Chapter 7 – Noise and Vibration	<p>With regard to construction activities, best practice control measures from construction sites within BS 5228 (2009 +A1 2014) Code of Practice for Noise and Vibration Control on Construction and Open Sites Parts 1 and 2 will be used to control noise and vibration impacts. The implementation of all best practice noise and vibration control methods will ensure potential impacts to nearby residential noise sensitive locations are not significant. This will be particularly important during excavation and foundation construction which are likely to be the activities to have the highest potential noise and vibration impact.</p> <p>Noise-related mitigation methods are described below and will be implemented for the project in accordance with best practice. These methods include:</p> <ul style="list-style-type: none"> <li>No plant used on site will be permitted to cause an ongoing public nuisance due to noise;</li> <li>The best means practicable, including proper maintenance of plant, will be employed to minimise the noise produced by on site operations;</li> <li>All vehicles and mechanical plant will be fitted with effective exhaust silencers and maintained in good working order for the duration of the contract;</li> <li>Compressors will be attenuated models fitted with properly lined and sealed acoustic covers which will be kept closed whenever the machines are in use and all ancillary pneumatic tools shall be fitted with suitable silencers;</li> <li>Machinery that is used intermittently will be shut down or throttled back to a minimum during periods when not in use;</li> </ul>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	

Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Mitigation Measures	Construction Phase	Operational Phase
5	Chapter 7 – Noise and Vibration	<ul style="list-style-type: none"> <li>• During construction, the contractor will manage the works to comply with noise limits outlined in BS 5228-1:2009+A1 2014. Part 1 – Noise;</li> <li>• All items of plant will be subject to regular maintenance. Such maintenance can prevent unnecessary increases in plant noise and can serve to prolong the effectiveness of noise control measures;</li> <li>• Limiting the hours during which site activities which are likely to create high levels of noise or vibration are permitted; and,</li> <li>• Monitoring levels of noise and vibration during critical periods and at sensitive locations (i.e. at the boundary between the development site and the school and residential buildings).</li> <li>• Furthermore, it is envisaged that a variety of practicable noise and vibration control measures will be employed. These will include: Selection of plant with low inherent potential for generation of noise and/ or vibration;</li> <li>• Erection of good quality site hoarding to the site perimeters adjacent to sensitive receptors which will act as a noise barrier to general construction activity at ground level;</li> <li>• Erection of barriers as necessary around items such as generators or high duty compressors, and;</li> <li>• Situate any noisy plant as far away from sensitive properties as permitted by site constraints.</li> </ul>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	
		<p><b>Operational Phase – Mechanical and Electrical Plant</b></p> <p>As part of the detailed design of the development, plant items with appropriate noise and vibration ratings and, where necessary, appropriately selected remedial measures (e.g. enclosures, silencers, anti-vibration mounts etc.) will be specified in order that the adopted plant noise criteria is achieved at the façades of noise sensitive properties, including those within the development itself.</p> <p><b>Operational Phase – Inward Noise (Acoustic Design Strategy Part 2)</b></p> <p>As is the case in most buildings, the glazed elements and ventilation paths of the building envelope are typically the weakest element from a sound insulation perspective. In general, all wall constructions (i.e. blockwork or concrete and spandrel elements) offer a high degree of sound insulation, much greater than that offered by the glazing systems. Therefore, noise intrusion via the wall construction will be minimal.</p>		<p>✓</p> <p>✓</p>

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5	Chapter 7 – Noise and Vibration	<p>In this instance the facades highlighted in Figure 7-10 will be provided with upgraded acoustic glazing and ventilation that achieves the minimum sound insulation performance as set out in the tables below. Other facades in the development have no minimum requirement for sound insulation.</p> <p>The sound insulation specifications are expressed in the following units:</p> <p><b>R<sub>w</sub></b>                      Weighted Sound Reduction Index – This is the value of the sound insulation performance of a partition or element measured under <u>laboratory conditions</u>. It is a weighted single figure index that is derived from values of sound insulation across a defined frequency spectrum. Technical literature typically presents sound insulation data in terms of the R<sub>w</sub> parameter.</p> <p><b>D<sub>n,e,w</sub></b>                      Weighted element-normalized level difference. This is the value of sound insulation performance of a ventilator measured under laboratory conditions. It is a weighted single figure index that is derived from values of sound insulation across a defined frequency spectrum. Technical literature for acoustic ventilators typically presents sound insulation data in terms of the D<sub>n,e,w</sub> parameter.</p> <p><b>Sound Insulation Performance Requirements for Upgraded Acoustic Glazing, SRI (dB)</b></p> <p>SRI (dB) per Octave Band Centre Frequency (Hz)</p> <table border="1" data-bbox="566 995 1666 1082"> <thead> <tr> <th>125</th> <th>250</th> <th>500</th> <th>1k</th> <th>2k</th> <th>4k</th> </tr> </thead> <tbody> <tr> <td>26</td> <td>27</td> <td>34</td> <td>40</td> <td>38</td> <td>46</td> </tr> </tbody> </table> <p><b>Sound Insulation Performance Requirements for Upgraded Acoustic Ventilation, SRI (dB)</b></p> <p>SRI (dB) per Octave Band Centre Frequency (Hz)</p> <table border="1" data-bbox="566 1235 1666 1321"> <thead> <tr> <th>125</th> <th>250</th> <th>500</th> <th>1k</th> <th>2k</th> <th>4k</th> </tr> </thead> <tbody> <tr> <td>31</td> <td>33</td> <td>42</td> <td>43</td> <td>39</td> <td>44</td> </tr> </tbody> </table>	125	250	500	1k	2k	4k	26	27	34	40	38	46	125	250	500	1k	2k	4k	31	33	42	43	39	44		<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>
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5	Chapter 7 – Noise and Vibration	<p>The overall <math>R_w</math> and <math>D_{n,e}</math> outlined above are provided for information purposes only. The overriding requirements are the octave band sound insulation performance values which may also be achieved using alternative glazing and ventilation configurations. Any selected system will be required to provide the same or greater level of sound insulation performance as that set out in Table 7-15 and Table 7-16. It is important to note that the acoustic performance specifications detailed herein are minimum requirements which apply to the overall glazing and ventilation systems. In the context of the acoustic performance specification the 'glazing system' is understood to include any and all of the component parts that form part of the glazing element of the façade, i.e. glass, frames, seals, openable elements etc.</p> <p>The assessment has demonstrated that the recommended internal noise criteria can be achieved through consideration of the proposed façade elements at the detailed design stage. The calculated glazing and ventilation specifications are preliminary and are intended to form the basis for noise mitigation at the detailed design stage. Consequently, these may be subject to change as the project progresses.</p>		<p>✓</p> <p>✓</p>
6	Chapter 8 – Traffic	<p>The following mitigation measure shall apply during the construction stage:</p> <ul style="list-style-type: none"> <li>All construction activities will be managed and directed by a Construction Traffic Management Plan (CTMP). The details of the CTMP will be agreed with the roads department of the Local Authority in advance of construction activities commencing on-site.</li> </ul> <p>Below is a list of proposed traffic management measures to be adopted during the construction works by the Contractor. Note that this is not an exhaustive list, and it will be the appointed contractor's responsibility to prepare a detailed Construction Traffic Management Plan to be approved with the Planning Authority prior to commencement of construction.</p> <ul style="list-style-type: none"> <li>Warning signs / Advanced warning signs will be installed at appropriate locations in advance of the construction access;</li> <li>Construction and delivery vehicles will be instructed to use only the approved and agreed means of access and movement of construction vehicles will be restricted to these designated routes;</li> <li>Restriction of HGV movements during drop off and pick up times associated with the adjacent schools;</li> </ul>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	
6	Chapter 8 – Traffic	<ul style="list-style-type: none"> <li>Restriction of HGV movements during drop off and pick up times associated with the adjacent schools;</li> </ul>	<p>✓</p>	

Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Mitigation Measures	Construction Phase	Operational Phase
		<ul style="list-style-type: none"> <li>• Appropriate vehicles will be used to minimise environmental impacts from transporting construction material, for example the use of dust covers on trucks carrying dust producing material;</li> <li>• Speed limits of construction vehicles to be managed by appropriate signage, to promote low vehicular speeds within the Site;</li> <li>• Parking of Site vehicles will be managed, and will not be permitted on public roads, unless proposed within that designated area that is subject to traffic management measures;</li> <li>• A road sweeper will be employed to clean the public roads adjacent to the Site of any residual debris that may be deposited on the public road leading away from the construction Site;</li> <li>• On Site wheel washing will be undertaken for construction trucks and vehicles to remove any debris prior to leaving the Site, to avoid any potential for debris on the local roads;</li> <li>• All vehicles will be suitably serviced and maintained to avoid leaks or spillage of oil, petrol or diesel. Spill kits will be available on Site. All scheduled maintenance carried out off Site will not be carried out on the public highway; and,</li> <li>• Safe and secure pedestrian facilities are to be provided where construction works obscure any existing pedestrian footway. Alternative pedestrian facilities will be provided in these instances, supported by physical barriers to segregate traffic and pedestrian movements, and to be identified by appropriate signage. Pedestrian facilities will cater for vulnerable users and mobility impaired persons.</li> <li>• HGV movements will be managed so as not to occur during the background traffic peak period, particularly the AM school drop off period.</li> </ul> <p>The above mitigation measures will minimise any significant environmental degradation or safety concerns in the vicinity of the proposed works, due to the presence of construction traffic. Furthermore, it is in the interest of the construction programme that deliveries, particularly concrete deliveries are not unduly hampered by traffic congestion, and as a result continuous review of haulage routes, delivery timings and access arrangements will be undertaken as construction progresses to ensure smooth operation.</p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	

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6	Chapter 8 – Traffic	<p>The proposed development is consistent with all national, regional and local policies. In particular, those policies and objectives aligned with active and sustainable travel and transportation. Specific mitigation measures proposed include the following:</p> <ul style="list-style-type: none"> <li>• Implementation of the public transport bridge (Part 8 – Bray Sustainable Transport Bridge, Planning Reference PRR 21/869) by Wicklow County Council which will link both bus and future Luas services to the Bray DART station. This bridge will improve connectivity to the Site and facilitate the future extension of the Luas to the Bray DART Station;</li> <li>• The Riverside Quarter includes for the provision of LUAS Stop(s) within the development lands which are expected to decrease dependence on private vehicles;</li> <li>• The overall Harbour Point Masterplan for the development lands takes cognisance of the provision of the Luas extension and its interface with the development and locations of LUAS stops;</li> <li>• The proposed BusConnects – Core Bus Corridor Route 13 has been included in the development plans which will further decrease private vehicle usage in the future;</li> <li>• The development takes cognisance of the NTA’s plans to redesign the bus network and provide a more efficient network with high frequency spines, new orbital routes and increased bus services;</li> <li>• The development is adjacent and accessible to Routes B1 and 14 /N5 Greater Dublin Area Cycle Network Plan;</li> <li>• Demand Management is also underpinned by the co-location of residential, education, local retail and leisure and amenity facilities; and,</li> <li>• The propensity for car ownership and car use is managed through measures that include reduced residential parking provision and increased cycle parking provision in line the ‘Design Standards for New Apartments’. The provision of car club parking spaces will facilitate a lower level of car ownership.</li> </ul> <p>The above mitigation measures will provide alternatives to the private car for making trips and are envisaged to promote low car ownership which will in turn ensure that the level of traffic generation and thus the traffic impact on the local road network is mitigated.</p>		<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>

Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Mitigation Measures	Construction Phase	Operational Phase
7	Chapter 9 – Land, Soils and Geology	<p>Stripping of topsoil will be carried out in a controlled and carefully managed way and coordinated with the proposed staging for the development. At any given time, the extent of topsoil strip (and consequent exposure of subsoil) will be limited to the immediate vicinity of active work areas. Topsoil stockpiles will be protected for the duration of the works and will be located so as not to necessitate double handling.</p> <p>Soil beneath the proposed footprint of all housing and duplex units is suitable (from a human health and environmental perspective) for reuse within the proposed residential gardens, with the exception of two localised hotspots (TP205 and TP208). The extent of these hotspot areas (from ground level to 1mbgl) is estimated to be 10m x 10m, centred around each of the following locations:</p> <ul style="list-style-type: none"> <li>• TP205 Hotspot - Grid Reference: 726,442.09 E, 719,477.12 N; and,</li> <li>• TP208 Hotspot - Grid Reference: 726,491.25 E, 719,426.98 N.</li> </ul> <p>This material (ca. 200m<sup>3</sup>) should be removed for reuse elsewhere onsite, or for offsite disposal to a suitably licenced / permitted waste facility. These soils can be replaced if needed by soils from elsewhere beneath the proposed footprint of all housing and duplex units, or from the north-western portion of the Site (e.g., excavated material from Block D), or via. suitable imported uncontaminated soil / topsoil. Any subsoil or topsoil removed from a 10mx10m area surrounding the location of WS01B, WS03A, WS05A, TP203, TP209 and TP211 shall not be reused in the location of the houses or duplexes or any other location where there is a likelihood of home grown produce being grown. The Contractor, in consultation with the Client and the Engineer, will be responsible for ensuring that the two localised soil hotspots (TP205 and TP208) are removed and replaced with suitable material as required.</p> <p>The design of road levels and finished floor levels has been carried out in such a way as to minimise cut/fill type earthworks operations. The duration that subsoil layers are exposed to the effects of weather will be minimised. Disturbed subsoil layers will be stabilised as soon as practicable (e.g., backfill of service trenches, construction of road capping layers, construction of building foundations and completion of landscaping). Similar to comments regarding stripped topsoil, stockpiles of excavated subsoil material will be protected for the duration of the works. Stockpiles of subsoil material will be located separately from topsoil stockpiles. The Contractor will be responsible for ensuring these measures are fully implemented.</p> <p>The excavation of material will be minimised as much as possible to reduce the impact on soils and geology. Any surplus material, or materials which are deemed not suitable for onsite reuse will be classified in accordance with the EPA Guidance Document '<i>Waste Classification, List of Waste &amp; Determining if Waste is Hazardous or Non-Hazardous</i>' (2015). It will be the Contractors responsibility to ensure that all waste soils are classified correctly and managed,</p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	

Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Mitigation Measures	Construction Phase	Operational Phase
7	Chapter 9 – Land, Soils and Geology	<p>transported and disposed of offsite in accordance with the requirements of the Waste Management Act 1996, as amended, the Waste Framework Directive 2008/98/EC of the European Parliament and Council on waste and any relevant subsequent waste management legislation.</p> <p>The minor amount of waste C&amp;D material observed in a localised area within the southern portion of the Site will also be removed from site and disposed of in accordance with all relevant waste management legislation. A Resource and Waste Management Plan has been generated for the Site (Document Ref: 5214419DG0011(Atkins, 2022)). It will be the Contractors responsibility to ensure that a project specific Detailed Waste Management Plan is fully implemented onsite for the duration of the project.</p> <p>Based on CIRIA 665 guidance, gas protection measures would be required in the vicinity of proposed apartment blocks B and C, based on this part of the Site being CS2. The typical scope of protective measures for residential buildings (not low rise traditional housing), such as apartment blocks B and C (for CS2) is as follows (CIRIA 665, 2007):</p> <ul style="list-style-type: none"> <li>• <b>Option a)</b> - Reinforced concrete cast in situ floor slab (suspended, non-suspended or raft) with at least 1200g damp proof membrane (DPM) and underfloor venting; or;</li> <li>• <b>Option b)</b> - Beam and block or pre-cast concrete and 2000g DPM / reinforced gas membrane and underfloor venting; and,</li> <li>• All joints and penetrations sealed.</li> </ul> <p>Gas protection measures (based on the above scope) for apartment blocks B and C will be incorporated into the Detailed Design Stage of the proposed development; and will be installed by experienced and trained specialists and will be subject to inspection and certification, during the Construction Stage. The Contractor, in consultation with the Client and the design team, will be responsible for ensuring that these measures are fully implemented and verified.</p> <p>Further mitigation measures for the prevention of soil / bedrock contamination during construction are proposed below. The Contractor will be responsible for ensuring these measures are fully implemented. Mitigation measures outlined in Chapter 10 - Water are also applicable to the protection of soils and geology during the construction phase:</p> <ul style="list-style-type: none"> <li>• In advance of commencement of the Construction Stage, all onsite monitoring wells (as identified in the Ground Investigation Report (IGSL, 2021) presented in Appendix 9.1, and the historic well located in the north-eastern portion of the Site, will be fully decommissioned by an experienced borehole specialist in accordance with relevant</li> </ul>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	

Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Mitigation Measures	Construction Phase	Operational Phase
7	Chapter 9 – Land, Soils and Geology	<p>guidelines, ‘Good practice for decommissioning redundant boreholes and wells’ (UK Environment Agency, 2012);</p> <ul style="list-style-type: none"> <li>• Earthworks / piling plant and vehicles delivering construction materials to Site will be confined to predetermined haul routes around the Site for each phase of the proposed development;</li> <li>• The need for vehicle wheel wash facilities will be assessed by the Contractor depending on the phasing of works and onsite activity and will be installed as needed, near any Site entrances and road sweeping implemented as necessary to maintain the road network in the immediate vicinity of the Site;</li> <li>• Dust suppression measures (e.g., dampening down) will be implemented as necessary during dry periods;</li> <li>• All excavated materials / piling arisings will be stored away from the excavations / immediate works area, in an appropriate manner at a safe and stable location. The maximum height of temporary stockpiles will be 3m;</li> <li>• A comprehensive monitoring and supervisory regime including monitoring of all excavations and stability assessments as required will be put in place to ensure that the proposed construction works do not constitute a risk to the stability of the Site;</li> <li>• The employment of good construction management practices will serve to minimise the risk of pollution from construction activities at the proposed development in line with the Construction Industry Research and Information Association (CIRIA) publication entitled, Control of Water Pollution from Construction Sites, Guidance for Consultants and Contractors, CIRIA - C532 (2001) which are also detailed in Chapter 10 – Water; and,</li> <li>• Specifically, regarding pollution control measures, the following will be adhered to; <ul style="list-style-type: none"> <li>- Fuels, lubricants and hydraulic fluids for equipment used on the construction Site, as well as any solvents, oils, and paints will be carefully handled to avoid spillage, properly secured against unauthorised access or vandalism, and provided with spill containment according to best codes of practice;</li> <li>- Waste oils and hydraulic fluids will be collected in leak-proof containers and removed from the proposed development for disposal or re-cycling;</li> <li>- Any spillage of fuels, lubricants or hydraulic oils will be immediately contained and the contaminated soil removed from the proposed development and properly disposed of;</li> </ul> </li> </ul>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	



Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Mitigation Measures	Construction Phase	Operational Phase
7	Chapter 9 – Land, Soils and Geology	<p>given the task of overseeing the pollution prevention measures agreed for the Site to ensure that they are operating safely and effectively.</p> <p>The above mitigation measures will be incorporated (as required) during Detailed Design Stage and will form part of a site-specific Construction Environmental Management Plan (CEMP) which will be implemented during the Construction Stage (including initial Site preparatory / enabling works).</p>	✓	
		<p>Taking account of the relevant mitigation measures to be implemented during the Detailed Design Stage and Construction Stage (specifically the installation of an appropriate ground gas membrane beneath apartment blocks B and C, and the removal of two localised soil hotspots from the proposed footprints of the housing and duplex units and associated gardens), no further mitigation measures will be required during the operational phase.</p>		✓
8	Chapter 10 – Water	<p>With regard to groundwater and surface water quality impacts the following mitigation measures are proposed. The Contractor will be responsible for ensuring these measures are fully implemented:</p> <ul style="list-style-type: none"> <li>• In advance of commencement of the Construction Stage, all onsite monitoring wells (as identified in the Ground Investigation Report (IGSL, 2021) presented in Appendix 9.1, and the historic well located in the north eastern portion of the Site, will be fully decommissioned by an experienced borehole specialist in accordance with relevant guidelines, ‘<i>Good practice for decommissioning redundant boreholes and wells</i>’ (UK Environment Agency, 2012);</li> <li>• The construction management of the Site will take account of the recommendations of the Construction Industry Research and Information Association (CIRIA) guidelines ‘<i>Control of Water Pollution from Construction Sites</i>’ and ‘<i>Groundwater control - design and practice</i>’ and CIRIA 2010 ‘<i>Environmental Good Practice on Site</i>’ to minimise as far as possible the risk of pollution.</li> <li>• All of the mitigation measures (for the protection of soils and geology) listed in Chapter 9 will be implemented onsite during the construction phase.</li> <li>• Any groundwater temporarily dewatered during the excavation works for the proposed attenuation tanks and for building foundations in the central and southern portions of the Site, and during piling (as required), will be treated via. the installation of a temporary in-situ water treatment system;</li> </ul>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	

Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Mitigation Measures	Construction Phase	Operational Phase
8	Chapter 10 – Water	<ul style="list-style-type: none"> <li>- This system should be designed and sized to ensure that all pumped groundwater water is treated via. a temporary attenuation pond, prior to discharge to a selected onsite location (via. a temporary soakaway).</li> <li>- The Contractor will be required to provide a Site-specific dewatering plan, clearly setting out proposed excavation methodology, estimated dewatering rates, details of proposed treatment system, and discharge location.</li> <li>• The Contractor will be responsible for ensuring that the existing drainage network, specifically along the existing road, and as required elsewhere across the site, will be suitably protected (via. the use of physical barriers and / or the implementation a Site-specific water run-off management plan as required).</li> <li>• In order to prevent any potential surface water / groundwater impacts via. release of hydrocarbon / chemical contaminants the following standard measures will be implemented: <ul style="list-style-type: none"> <li>- Fuels, lubricants and hydraulic fluids for equipment used on the construction Site, as well as any solvents, oils, and paints will be carefully handled to avoid spillage, properly secured against unauthorised access or vandalism, and provided with spill containment according to best codes of practice;</li> <li>- Waste oils and hydraulic fluids will be collected in leak-proof containers and removed from the proposed development for disposal or re-cycling;</li> </ul> </li> <li>• A response procedure will be put in place to deal with any accidental pollution events. Any spillage of fuels, lubricants or hydraulic oils will be immediately contained and the contaminated soil removed from the proposed development and properly disposed of in accordance with all relevant waste management legislation; <ul style="list-style-type: none"> <li>- All Site vehicles used will be refuelled in bunded and adequately sealed and covered areas in the construction compound area.</li> <li>- Strict supervision of contractors will be adhered to in order to ensure that all plant and equipment utilised on-Site is in good working condition. Any equipment not meeting the required standard will not be permitted for use within the Site. This will minimise the risk of groundwater becoming contaminated through Site activity.</li> <li>- All oil stored on Site for construction vehicles will be kept in a locked and bunded area;</li> <li>- Generators, pumps and similar plant will be placed on drip-trays to prevent contamination;</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>✓</li> <li>✓</li> <li>✓</li> <li>✓</li> <li>✓</li> <li>✓</li> <li>✓</li> <li>✓</li> <li>✓</li> <li>✓</li> </ul>	

Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Mitigation Measures	Construction Phase	Operational Phase
8	Chapter 10 – Water	<ul style="list-style-type: none"> <li>- All Site vehicles used will be refuelled in bunded areas;</li> <li>- All temporary construction fuel tanks will also be located in a suitably bunded area and all tanks will be double skinned. Relevant Material Safety Data Sheets along with oil absorbent materials will be kept on Site in close proximity to any fuel storage tanks or bowsers during proposed Site development works; and,</li> <li>- All fuel / oil deliveries to on-Site oil storage tanks will be supervised, and records will be kept of delivery dates and volumes.</li> <li>• In order to prevent any potential surface water / groundwater impacts via. release of cementitious materials the following measures will be implemented where poured concrete is being used on Site; <ul style="list-style-type: none"> <li>- The production, transport and placement of all cementitious materials will be strictly planned and supervised. Site batching/production of concrete will not be carried out on Site and therefore these aspects will not pose a risk to the waterbodies present, namely any temporarily exposed groundwater, the River Dargle or the Irish Sea;</li> <li>- Shutters will be designed to prevent failure. Grout loss will be prevented from shuttered pours by ensuring that all joints between panels achieve a close fit or that they are sealed;</li> <li>- Any spillages will be cleaned up and disposed of correctly;</li> <li>- Where concrete is to be placed by means of a skip, the opening gate of the delivery chute will be securely fastened to prevent accidental opening;</li> <li>- Where possible, concrete skips, pumps and machine buckets will be prevented from slewing over water when placing concrete;</li> <li>- Mixer washings and excess concrete will not be discharged directly into the drainage network, or any drainage ditches, surface water bodies or exposed groundwater; and,</li> <li>- Surplus concrete will be returned to batch plant after completion of a pour.</li> </ul> </li> <li>• Foul drainage from Site offices and Site compounds will be directed to the existing wastewater network or will be contained and disposed of off-site in an appropriate manner and in accordance with the relevant statutory regulations.</li> </ul> <p>The above mitigation measures will form part of the Construction Environmental Management Plan (CEMP) submitted as part of this planning application, and which will be further developed by the Contractor within the project-specific Detailed CEMP which will be in operation during the construction phase.</p>	<ul style="list-style-type: none"> <li>✓</li> <li>✓</li> <li>✓</li> <li>✓</li> <li>✓</li> <li>✓</li> <li>✓</li> <li>✓</li> <li>✓</li> <li>✓</li> <li>✓</li> <li>✓</li> <li>✓</li> <li>✓</li> </ul>	

Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Mitigation Measures	Construction Phase	Operational Phase
8	Chapter 10 – Water	<p>With regard to groundwater and surface water quality impacts the following mitigation measures are proposed;</p> <ul style="list-style-type: none"> <li>• All of the mitigation measures (for the protection of soils and geology) listed in Chapter 9 will be implemented onsite during Detailed Design Stage and Construction Stage (specifically the installation of an appropriate ground gas membrane beneath apartment blocks B and C, and the removal of two localised soil hotspots from the proposed footprints of the housing and duplex units and associated gardens). The Contractor, in consultation with the Client and the design team, will be responsible for ensuring that these measures are fully implemented.</li> <li>• All plant and equipment utilised onsite during maintenance works should be checked and in good working condition. Any equipment not meeting the required standard will not be permitted for use within the Site. Relevant maintenance contractors will be responsible for ensuring that these measures are fully implemented;</li> <li>• Any minor volumes of fuel, oil or chemicals required during routine maintenance works will be brought to and from Site by the maintenance contractor. While temporarily onsite all chemicals will be kept in secure and bunded areas, with relevant Material Safety Data Sheets available onsite. Any fuel / oil tanks temporarily stored on Site will be located in a suitably bunded area and all tanks will be double skinned, with oil / chemical absorbent materials held onsite in close proximity to the tanks. Relevant maintenance contractors will be responsible for ensuring that these measures are fully implemented;</li> <li>• In the unlikely event of a fuel / oil or chemical spill / leak during routine maintenance works, emergency spill response measures will be implemented with the aim of limiting the volume spilled and recovering as much of the lost product as possible (relevant maintenance contractors will be responsible for ensuring that these measures are fully implemented); and,</li> <li>• A maintenance programme for the proposed surface water drainage system should be implemented. The Contractor, in consultation with the Client and the design team, will be responsible for ensuring that these measures are fully implemented. Regular checks and maintenance of the proposed surface water drainage system should be implemented, as recommended in the Stormwater Impact Assessment Report (Atkins, 2022) (document ref.: 5214419DG0012) submitted as part of this planning application.</li> </ul>		<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>
9	Chapter 11 – Cultural Heritage	A suitably qualified archaeologist will be appointed by the Developer to carry out a programme of archaeological monitoring of ground excavation works during the construction phase and this will be carried out under a licence issued by the National Monument Service. Given the		

Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Mitigation Measures	Construction Phase	Operational Phase
9	Chapter 11 – Cultural Heritage	<p>absence of any unrecorded, sub-surface archaeological features identified during the geophysical survey and subsequent test trenching investigations carried out as part of this assessment the potential for the presence of such features is not considered likely but in the event that any archaeological remains are identified during monitoring they will be recorded and left to remain securely in situ while the National Monuments Service are consulted to determine further appropriate mitigation measures, which may entail preservation in situ by avoidance or preservation in record by archaeological excavation.</p> <p>Whilst the linear earthwork feature is of no great antiquity or cultural heritage significance (as evidenced by a series of archaeological investigations of the feature), The positioning of the roads and residential blocks have been arrayed so that they form a spatial marker (or morphological memory) of the ‘Nun’s Walk’ former location and alignment. The Nun’s walk will feature and be defined by engraved paving slabs laid through the public open space area located between apartment blocks A and B to echo the alignment of this linear earthwork along with the alignment of the boundary between Dublin and Wicklow. This feature will run through the paved area that also provides drop off access to the entrance of Block A. The space also allows for the potential installation of public artwork to further define the character and mark the history of the space, including delineation of the alignment of the earthwork through paving, interpretive text and imagery. In addition, the design provides for a feature stone wall along this section of the railway boundary to act as ‘stage scenery’ and reinforce the importance of this area of open space. This open space will provide connectivity with the Green Spine and the Coastal Gardens character areas to maintain pedestrian permeability throughout the development. Refer to Chapter 5 - Landscape and Visual for further information.</p>	<p>✓</p> <p>✓</p>	
		<p>Given the factors outlined in Section 11.5 of this chapter combined with the implementation of the mitigation measures presented in Section 11.7.1 which will provide for either the avoidance or the proper and adequate recording of any currently unrecorded archaeological features within its boundary, there are no predicted mitigation measures required for the cultural heritage resource during the operational phase.</p>		<p>✓</p>
10	Chapter 12 – Material Assets	<p><b>Built Services</b></p> <p>The following mitigation measures will be implemented during the construction phase;</p> <ul style="list-style-type: none"> <li>• A project-specific Detailed Construction Environmental Management Plan (CEMP) will be prepared by the appointed Contractor prior to the commencement of construction works. This document will take account of all of the environmental considerations (including water, dust and noise nuisance control; soil / stockpile management; temporary groundwater management; appropriate Site management of compound area; fuel, oil and</li> </ul>	<p>✓</p>	

Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Mitigation Measures	Construction Phase	Operational Phase
10	Chapter 12 – Material Assets	<p>chemical storage and use; and waste management) set out in the Outline CEMP submitted as part of this planning application;</p> <ul style="list-style-type: none"> <li>• Phasing of the diverted foul water network is to be fully coordinated with Irish Water to ensure the reduced likelihood of requirements to use the existing system while the diversion is being made;</li> <li>• The construction compounds will include adequate temporary welfare facilities including foul drainage and potable water supply. Foul drainage discharge from the compound will be removed off site to an appropriately licensed facility for disposal until a connection to the public foul drainage network has been established;</li> <li>• All newly installed utilities/ services will be assessed, tested and certified as required prior to being fully commissioned;</li> <li>• Connections to the existing and proposed foul networks will be coordinated with the relevant utility provider. All works associated with the existing and proposed utilities for the proposed development will be carried out in strict accordance with the guidelines of the relevant stakeholders (specifically ESB, eir and Irish Water), Health and Safety Authority and any additional site specific requirements;</li> <li>• A copy of all available existing, and as built utility plans will be maintained on Site during the construction of the proposed development. The underground power lines and foul water mains within the existing Irish Water services, located onsite will be clearly marked and all Site personnel will be made aware of the known location of any onsite underground or over ground services during the construction phase; and,</li> <li>• Street Lighting will be implemented in accordance with the MEP Engineering Report &amp; Design Statement prepared by Atkins (2022).</li> </ul> <p><b>Waste Management</b></p> <p>The following mitigation measures will be implemented during the construction phase:</p> <ul style="list-style-type: none"> <li>• All waste management procedures implemented onsite during the construction phase will be in accordance with the RWMP (Atkins, 2022) submitted as part of this planning application. In advance of commencement onsite, the Contractor will prepare a project specific Detailed RWMP which will further develop this plan, and will provide specific details in terms of proposed permitted haulage contractors, and permitted / licenced waste disposal / recovery facilities;</li> <li>• Scheduling and planning the delivery of materials will be carried out on an ‘as needed’ basis to limit any surplus materials;</li> </ul>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	

Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Mitigation Measures	Construction Phase	Operational Phase
10	Chapter 12 – Material Assets	<ul style="list-style-type: none"> <li>• Materials will be ordered in sufficient dimensions so as to optimise the use of these materials onsite, and will be carefully handled and stored so as to limit the potential for any damage;</li> <li>• Where feasible, sub-contractors will be responsible for the provision of any materials they require onsite in order to help reduce any surplus waste;</li> <li>• All loaded trucks entering and exiting the Site will be appropriately secured and covered; and,</li> <li>• Dust will be controlled at entry and exits to the Site using wheel washes (as required) and/or road sweepers, and tools and plant will be washed out and cleaned in designated areas. Wheel / road sweeper washings will be contained and treated prior to discharge.</li> </ul>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	
		<p><b>Built Services</b></p> <ul style="list-style-type: none"> <li>• On site network surveys, which can only be carried out once the development has been constructed, will be required to determine whether additional microwave radio transmitters are required. Recommendations will be implemented as needed (BBSC, 2022).</li> <li>• The proposed development would result in an approximate range of 1,465 to 2,637 additional people within the locality. For this quantum of development, a minimum of 3 to 4 additional mobile phone transmitters <u>may</u> be required to provide 4G or better service within the area. As is the case for developments of this scale, any requirement for additional mobile phone transmitters will be subject to a network load analysis by the mobile phone network providers that can only be carried out once the development has been constructed. Should this network load analysis conclude that additional mobile phone transmitters are required, these could be located in or at Block B2 as it is the tallest building within the proposed development (12 storeys). A standalone planning permission would be required for any mobile phone transmitters (BBSC, 2022).</li> </ul> <p><b>Waste Management</b></p> <p>Waste management during the operational phase of the development will be undertaken by private waste contractors (in accordance with statutory waste management and environmental requirements, regional waste related policy, and best practice waste management guidance), and regulated by Dún Laoghaire-Rathdown and Wicklow County Council. All waste management procedures implemented onsite during the operational phase will be in accordance with the Operational WMP (Atkins, 2022) submitted as part of this</p>		<p>✓</p> <p>✓</p> <p>✓</p>

Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Mitigation Measures	Construction Phase	Operational Phase
10	Chapter 12 – Material Assets	<p>planning application. Therefore, no further mitigation measures are required with regard to the transport and disposal or recovery of all waste streams which will be generated during the operational phase.</p> <p>The following mitigation measures will be implemented during the operational phase in order to minimise the potential impact of litter pollution;</p> <ul style="list-style-type: none"> <li>• Suitably sized waste receptacles will be provided in communal areas within the residential development and commercial units by private waste contractors;</li> <li>• During the operational phase waste shall be collected on a fortnightly basis from all houses and duplexes, and on a weekly basis from all apartment blocks and commercial units; and,</li> <li>• It will be the responsibility of residents, crèche users, commercial unit occupants and maintenance workers to ensure that all waste generated is disposed of appropriately and responsibly, with penalties and legal sanctions being issued to anyone who is found to litter in accordance with the Litter Pollution Act by Wicklow County Council (2019-2024) and Litter Management Plan for Dún Laoghaire-Rathdown County Council (2021-2023).</li> </ul>		<p>✓</p> <p>✓</p> <p>✓</p>

**Table 15-2 – Schedule of Environmental Commitments – Monitoring Requirements (Construction and Operational Phases)**

Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Monitoring Requirements	Construction Phase	Operation Phase
11	Chapter 3 – Population and Human Health	<p>Measures to avoid negative impacts on population and human health are largely integrated into the design and layout of the proposed development. Compliance with the design and layout will be a condition of any permitted development.</p> <p>Monitoring will be undertaken by the Building Regulations certification process and by the requirements of specific conditions of a planning permission. Monitoring of compliance with Health and Safety requirements will be undertaken by the Project Supervisor for the Construction Process.</p> <p>It is considered that the monitoring measures outlined in regard to the other environmental topics will ensure that the proposed development is unlikely to result in any adverse impacts in relation to population and human health.</p>	<p>✓</p> <p>✓</p> <p>✓</p>	

Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Monitoring Requirements	Construction Phase	Operation Phase
12	Chapter 4 – Biodiversity	<p>The Bat Conservation Plan (refer to Appendix 4.3) will be implemented by the Contractor under the supervision of the appointed bat specialist. Pre-construction (pre-site clearance) monitoring shall be undertaken by the Contractor appointed Bat Specialist where trees shall be inspected for the presence of roosting bats. Following the tree surveys, specific Site clearance protocols will be established and, if necessary and bat roosts are found within trees to be lost, then NPWS consultation will be undertaken. If required, method statements will be proffered and derogation sought from NPWS for the safe removal of bats from roost sites. The identified bat roosts in 2 no. oak trees off Site (refer to Appendix 4.3 for locations) will be surveyed for the presence of bats. These 2 no. oak trees will be retained and the bat and bat roost protection measures outlined in the Bat Conservation Plan will be adhered to throughout the construction phase.</p> <p>Pre-construction / pre-Site clearance terrestrial mammal surveys will be undertaken by the Contractor appointed suitably qualified ecologist to assess if badgers, or any other protected mammals, have established refugia (e.g. a badger sett) within the Site. If protected mammal refugia is found within the Site, then consultation with NPWS will be undertaken by the project ecologist and associated method statements and mitigation will be proffered and derogation sought from NPWS.</p> <p>Removal of nesting habitat (hedgerows, trees and woodland) must be carried out outside of the bird breeding season (from 1<sup>st</sup> March to 31<sup>st</sup> August). Consultation must be undertaken with the National Parks and Wildlife Service for any nesting habitat clearance works outside of this seasonal window (as detailed in the Construction phase mitigation measures above).</p> <p>Once operational the implementation of the landscape plan and compensatory habitat such as wild flower meadows and additional planting should be inspected by the Contractor within one year post planting. If landscaping measures have failed an alternative solution should be proposed by the Contractor.</p> <p>Operational phase monitoring (in order to ensure the continued success of the landscape features, specifically in relation to biodiversity enhancement measures) shall be undertaken by those in charge of the maintenance and management of the development. Operational phase monitoring in order to ensure the success of the refuge habitats shall be undertaken by those in charge of the maintenance and management of the development.</p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	
		<p>Operational phase monitoring (in order to ensure the continued success of the landscape features, specifically in relation to biodiversity enhancement measures) shall be undertaken by those in charge of the maintenance and management of the development. Operational phase monitoring in order to ensure the success of the refuge habitats shall be undertaken by those in charge of the maintenance and management of the development.</p>		<p>✓</p>

Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Monitoring Requirements	Construction Phase	Operation Phase
13	Chapter 5 – Landscape and Visual	Not applicable to this chapter		
14	Chapter 6 – Air Quality and Climate	Monitoring of construction dust deposition along the site boundary to nearby sensitive receptors during the construction phase of the proposed development is recommended to ensure mitigation measures are working satisfactorily. This can be carried out using the Bergerhoff method in accordance with the requirements of the German Standard VDI 2119. The Bergerhoff Gauge consists of a collecting vessel and a stand with a protecting gauge. The collecting vessel is secured to the stand with the opening of the collecting vessel located approximately 2m above ground level. The TA Luft limit value is 350 mg/(m <sup>2</sup> *day) during the monitoring period between 28 - 32 days.	✓	
		There is no monitoring recommended for the operational phase of the development as impacts to air quality and climate are predicted to be imperceptible.		✓
15	Chapter 7 – Noise and Vibration	There is a requirement to ensure that construction activities operate within the noise and vibration limits set out within this EIAR. There is also a requirement to undertake regular noise and vibration monitoring at locations representative of the closest sensitive locations to ensure the relevant criteria are not exceeded. Noise monitoring shall be conducted in accordance with the International Standard ISO 1996: 2017: Acoustics – Description, measurement and assessment of environmental noise. It will be a requirement of the appointed contractor to undertake such noise monitoring during the relevant phases of the construction program.	✓	
15		Vibration monitoring shall be conducted in accordance with BS 6472 for human disturbance and BS ISO 4866:2010 for building damage. It will be a requirement of the appointed contractor to undertake such vibration monitoring during the relevant phases of the construction program.	✓	
16	Chapter 8 – Traffic	Not applicable for this Chapter.		
17	Chapter 9 – Land, Soils and Geology	A comprehensive monitoring and supervisory regime including monitoring of all excavations and stability assessments as required will be put in place to ensure that the proposed construction works do not constitute a risk to the stability of the Site.	✓	
18	Chapter 10 – Water	Regular checks and maintenance of the proposed surface water drainage system should be implemented, as recommended in the Stormwater Impact Assessment Report (Atkins, 2022) (document. ref.: 5214419DG0012) submitted as part of this planning application.		✓
19	Chapter 11 – Cultural Heritage	There are a number of obligatory processes required as part of archaeological licence applications to the National Monuments Service and these will allow for monitoring of the successful implementation of the archaeological mitigation measures presented in Section 11.7.1. The archaeologist appointed to undertake licensed monitoring of the construction		

Item Ref.	Environmental Topic	Schedule of Environmental Commitments – Monitoring Requirements	Construction Phase	Operation Phase
19	Chapter 11 – Cultural Heritage	phase shall submit a method statement detailing the proposed strategy for archaeological supervision of ground works to the National Monuments Service as part of the license application. This will clearly outline the proposed extent of ground works and outline the consultation process to be enacted in the event that any unrecorded archaeological remains are identified, which may include preservation in situ by avoidance or preservation in record by archaeological excavation. The appointed archaeologist will compile a report on all archaeological Site investigations which will clearly present the results in written, drawn and photographic formats. Copies of this report will be submitted to the National Monuments Service and the National Museum of Ireland by the appointed archaeologist.	✓	
20	Chapter 12 – Material Assets	As detailed within the RWMP (Atkins, 2022) prepared as part of this planning application, the Contractor will be responsible for maintaining waste records and documentation for the full duration of the construction phase. The Contractor will track and monitor all waste volumes transported offsite. All waste records will be maintained onsite throughout the project and will be made available for viewing by the Client, Employer’s Representative and statutory consultees (WCC, DLRCC, EPA) as required.	✓	

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