

AtkinsRéalis



# EIA Screening Report

Shankill Property Investments Limited

July 2025

0118265DG0002

# SEA GARDENS PHASE 1 BLOCK A

# Notice

This document and its contents have been prepared and are intended solely as information for Shankill Property Investments Limited and use in relation to Sea Gardens Phase 1 Block A Screening for Environmental Impact Assessment.

AtkinsRéalis Ireland Limited assumes no responsibility to any other party in respect of or arising out of or in connection with this document and/or its contents.

This document has 44 pages including the cover.

## Document history

Document title: EIA Screening Report

Document reference: 0118265DG0002

Revision	Purpose description	Originated	Checked	Reviewed	Authorised	Date
0	Draft	FE	FE	DL	DL	29/05/25
1	For Issue	FE	FE	DL	DL	28/07/25

## Client signoff

<b>Client</b>	Shankill Property Investments Limited
<b>Project</b>	Sea Gardens Phase 1 Block A
<b>Job number</b>	100118265

**Client  
signature/date**



# Contents

<b>1.</b>	<b>Introduction.....</b>	<b>5</b>
1.1	Project Overview .....	7
1.2	Purpose of the Report .....	7
1.3	Site Zoning .....	7
<b>2.</b>	<b>Receiving Environment .....</b>	<b>10</b>
2.1	Hydrology .....	10
2.2	Ecology.....	11
2.3	Hydrogeology .....	13
2.4	Soils and Geology .....	13
2.5	Flood Risk .....	14
2.6	Archaeology and Cultural Heritage .....	15
2.7	Population and Human Health .....	16
2.8	Material Assets.....	17
2.8.1	Electricity .....	17
2.8.2	Waste Facilities .....	17
2.9	Landscape and Visuals .....	17
<b>3.</b>	<b>Description of the Proposed Development .....</b>	<b>18</b>
3.1	Nature and Extent of the Proposed Development .....	18
3.2	Construction Methodology .....	19
<b>4.</b>	<b>EIA Screening Process .....</b>	<b>21</b>
4.1	Desk-Based Studies.....	21
4.2	Site Visits and Assessments .....	21
4.3	EIA Screening Legislation and Guidance .....	22
<b>5.</b>	<b>EIA Screening .....</b>	<b>24</b>
5.1	Introduction .....	24
5.2	Part 1 Type Projects.....	24
5.3	Part 2 Type Projects.....	24
5.4	Selection criteria for screening Schedule 7 Proposed Project.....	25
5.5	Schedule 7 Assessment.....	26
5.5.1	Characteristics of the proposed project .....	26
5.5.2	Location of the Project .....	34
5.5.3	Characteristics of potential impact .....	39
<b>6.</b>	<b>Potential for Significant Effects on the Receiving Environment .....</b>	<b>42</b>
<b>7.</b>	<b>Screening Conclusion .....</b>	<b>43</b>



## Tables

Table 5-1 – Screening for Part 2 of Schedule 5 .....	24
Table 5-2 - Characteristics of the Proposed Project.....	26
Table 5-3 - Location of the Proposed Project.....	34
Table 5-4 - Characteristics of the proposed project.....	39

## Figures

Figure 1-1 - Location of the proposed development (EPA, 2025).....	5
Figure 1-2 - Proposed Development within Sea Gardens Masterplan Context .....	6
Figure 1-3 - Aerial Imagery of the proposed development (Google Maps, 2025) .....	6
Figure 1-4 - Land Use Zoning within the vicinity of the proposed development (DLRCC).....	8
Figure 2-1 - Surface Water Features within the vicinity of the proposed development (EPA, 2025) .....	11
Figure 2-2 - SACs within the Zol of the proposed development.....	12
Figure 2-3 - SPAs within the Zol of the proposed development.....	12
Figure 2-4 - Flood Risk and Previous Flood Events Map (OPW, 2025).....	14
Figure 2-5 - SMRs and NIAHs within the vicinity of the proposed development (NMS,2025) .....	16
Figure 3-1 - Proposed Site Layout Plan (Howells, 2025) .....	18
Figure 3-2 - Site Compound Location.....	20



# 1. Introduction

AtkinsRéalis has been commissioned by Shankill Property Investments Ltd (part of the Ballymore Group) to prepare an Environmental Impact Assessment (EIA) Screening Report 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)

This Environmental Impact Assessment (EIA) Screening Report has been prepared to consider the requirement, or otherwise, of carrying out an EIA in respect of the proposed development. This exercise was carried out in two stages:

- Stage 1 considered the requirement for a mandatory EIA; and,
- Stage 2 considered the requirement for a sub-threshold EIA.

## 1.1 Project Overview

The entire footprint for the proposed development is ca. 1.38ha. The proposed residential development will comprise of the provision of 159 no. residential units over/around a shared 2-level podium comprising of 9 no. terraced townhouses and 150 no. apartments. The apartments will be contained within 2 no. blocks ranging from 6 to 11-storeys (including the shared 2-level podium). The blocks will also include communal lounge areas, a communal gym, refuse storage areas and associated plant. The shared 2-level podium will include car, motorcycle and bicycle parking. The proposed development will also include public open space, communal open space, 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.

The aim of this project is to provide a greater proportion of family-sized homes designed for private sale and individual homeowners, with larger than normal apartment sizes and high-quality amenities and public open space. The design intent is to create a high-quality residential development on an infill site which integrates with adjoining developments, maximising existing public transport infrastructure and planned transport links and delivering national and regional objectives on compact growth and sustainable density. The proposal will provide for much needed residential development at a highly accessible location in the centre of Bray.

A full project description is given in Section 3 of this report.

## 1.2 Purpose of the Report

This report has been prepared to support the planning application to Dún Laoghaire-Rathdown County Council (DLRCC) in relation to the proposed Large-scale Residential Development at lands off the Dublin Road within the former Bray Golf Course lands, Bray, Co. Dublin on behalf of the prospective LRD applicant Shankill Property Investments Ltd. (part of the Ballymore Group). The purpose of this report is to determine if the development requires the preparation of an Environmental Impact Assessment Report (EIAR). The proposed development has been screened to generate a summarised overview of the potential effects on the receiving environment, and in the context of relevant statutory requirements.

A Stage 1 Screening for Appropriate Assessment has also been prepared for the proposed development (AtkinsRéalis, 2025). The proposed development has been assessed with regards to the likely significant effects of the project on European sites within the zone of influence (ZoI) of the proposed development. The AA Screening Report concluded that: *“the proposed Sea Gardens Block A development, either alone or in-combination with other plans or projects, will not result in likely significant effects on Rockabill to Dalkey Island SAC or Wicklow Mountains SAC or any other European site. Thus, it is recommended that it is not necessary for the scheme to proceed to Appropriate Assessment”*.

## 1.3 Site Zoning

The Dún Laoghaire-Rathdown County Council (DLRCC) Development Plan 2022-2028 sets out a strategy for the sustainable development and planning of Dún Laoghaire-Rathdown. It also outlines the policies and objectives for the



future development of this area of Dublin and its environs. As identified within this Development Plan the land use zonings and objectives within the vicinity of the proposed development can be seen in Figure 1-4, and are as follows:

- Objective A which seeks “to provide residential development and improve residential amenity while protecting the existing residential amenities”.
- Objective F which seeks “to preserve and provide for open space with ancillary active recreational amenities”.
- Specific Local Objective 119 - To provide a permeability link between the Green Area/Linear Park between Corke Abbey and Woodbrook Glen, and any development on the Former Bray Golf Club lands to allow access towards Bray Harbour.
- DU026-124 Record of Monuments And Place: Linear earthwork: CORK GREAT

The proposed development seeks to provide a new residential development on the Objective A lands and landscaped public open space on the Objective F lands. The proposed development is therefore considered to be fully consistent and compatible with the policies and objectives of the development strategy area as well as the zoning requirements under the Dún Laoghaire-Rathdown County Development Plan.



**Figure 1-4 - Land Use Zoning within the vicinity of the proposed development (DLRCC)**

Some objectives and policies from the Dún Laoghaire-Rathdown County Development Plan 2022-2028 that are relevant to the Sea Gardens Phase 1 Block A Residential Development can be seen below:

- **Policy Objective CS3 – Supply of Zoned Land:** It is a Policy Objective to ensure that sufficient zoned land continues to be available to satisfy the housing requirements of the County over the lifetime of the Plan.
- **Policy Objective CS4 – Strategic Land Reserve:** It is a Policy Objective to support the phased growth of the Key Town of Bray through the identification of a strategic land reserve to meet regional growth targets to 2031.
- **3.4.1.3 Policy Objective CA7: Construction Materials:** It is a Policy Objective to support the use of structural materials in the construction industry that have low to zero embodied energy and CO2 emissions. (Consistent with the RPO 7.41 of the RSES).



- **3.4.1.4 Policy Objective CA8: Sustainability in Adaptable Design:** It is a Policy Objective to promote sustainable approaches to the improvement of standards for habitable accommodation, by allowing dwellings to be flexible, accessible and adaptable in their spatial layout and design.
- **4.2.1.1 Policy Objective PHP2: Sustainable Neighbourhood Infrastructure:** It is a Policy Objective to: Protect and improve existing sustainable neighbourhood infrastructure as appropriate. Facilitate the provision of new sustainable neighbourhood infrastructure that is accessible and inclusive for a range of users consistent with RPO 9.13 and RPO 9.14 of the RSES. Encourage the provision of multi-functional facilities, space and lands in the delivery and/or improvement of sustainable neighbourhood infrastructure.
- **4.2.1.5 Policy Objective PHP6: Childcare Facilities:** It is a Policy Objective to: Encourage the provision of appropriate childcare facilities as an integral part of proposals for new residential developments and to improve/expand existing childcare facilities across the County. In general, at least one childcare facility should be provided for all new residential developments subject to demographic and geographic needs. Encourage the provision of childcare facilities in a sustainable manner to encourage local economic development and to assist in addressing disadvantage.
- **4.3.1.1 Policy Objective PHP18: Residential Density:** It is a Policy Objective to: Increase housing (houses and apartments) supply and promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites having regard to proximity and accessibility considerations, and development management criteria set out in Chapter 12. Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.
- **4.3.2.3 Policy Objective PHP27: Housing Mix:** It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and Housing Need Demand Assessment (HNDA) and any future Regional HNDA.
- **4.4.1.1 Policy Objective PHP35: Healthy Placemaking:** It is a Policy Objective to: Ensure that all development is of high quality design with a focus on healthy placemaking consistent with NPO 4, 26 and 27 of the NPF, and RPO 6.1, 6.12, 9.10 and 9.11 of the RSES. Promote the guidance principles set out in the 'Urban Design Manual – A Best Practice Guide' (2009), and in the 'Design Manual for Urban Roads and Streets' (2013). Ensure that development proposals are cognisant of the need for proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design.
- **4.4.1.8 Policy Objective PHP42: Building Design & Height:** It is a Policy Objective to: Encourage high quality design of all new development. Ensure new development complies with the Building Height Strategy for the County as set out in Appendix 5 (consistent with NPO 13 of the NPF).
- **4.4.1.10 Policy Objective PHP44: Design Statements:** It is a Policy Objective that, all medium to-large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) submit a 'Design Statement' and shall be required to demonstrate how the proposed development addresses or responds to the design criteria set out in the 'Urban Design Manual - A Best Practice Guide' (DoEHLG, 2009) and incorporates adaptability of units and/or space within the scheme.
- **10.2.2.9 Policy Objective EI9: Drainage Impact Assessment:** It is a Policy Objective to ensure that all new development proposals include a Drainage Impact Assessment that meets the requirements of the Council's Development Management Thresholds Information Document (see Appendix 3) and the Stormwater Management Policy (See Appendix 7.1)
- **11.4.3.6 Policy Objective HER24: Protection of Coastline Heritage:** It is a Policy Objective to: i. Encourage and promote the retention of features of the County's coastal heritage where these contribute to the character of the area. ii. Have regard to those items identified in the Coastal Architecture Heritage Survey when assessing any development proposals.
- **Specific Local Objective 119** - To provide a permeability link between the Green Area/Linear Park between Corke Abbey and Woodbrook Glen, and any development on the Former Bray Golf Club lands to allow access towards Bray Harbour.



## 2. Receiving Environment

The ca. 1.38 hectare subject site is located within the former Bray Golf Club lands north of the Dargle River and Bray town centre. 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 subject infill site contains remnants of its former use as a golf course and is primarily covered in grass and mixed vegetation. There is an existing pedestrian link to Corke Abbey Valley Park at the northern boundary of the site which was provided as part of the permitted development under ABP-311181-21 (Shoreside Park) and agreed through compliance with relevant conditions on the grant of permission. The site topography 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.

### 2.1 Hydrology

There are no EPA watercourses within the study area site. However, there are 2 watercourses within close vicinity of the proposed development as shown below in Figure 2-1. The closest water feature to the development is the Rathmicheal river which is located ca.25m north of the proposed development, ca.100m before the river discharges into the Southwestern Irish Sea - Killiney Bay coastal waterbody. The River Rathmicheal has a 'Good' status for the 2016-2021 monitoring period and is 'Not at Risk' of failing to meet relevant Water Framework Directive (WFD) by 2027. The Dargle river is located ca. 230m south of the proposed development, ca. 300m before the river discharges into the Dargle Estuary at Bray Harbour and subsequently the Southwestern Irish Sea - Killiney Bay coastal waterbody. The River Dargle has a 'Good' status for the 2016-2021 monitoring period, is 'Not at Risk' of failing to meet relevant Water Framework Directive (WFD) by 2027 and its latest River Q value (2025) taken ca. 1.2km southwest/upstream from the proposed development was 4/good from station RS10D010270 (EPA, 2025). The main channel of the River Dargle is noted to be designated as a Salmonid Water under the European Communities (Quality of Salmonid Waters) Regulations, 1988 (S.I. No. 293/1988) and the River Dargle is known to accommodate otters (NBDC records, 2017). The EPA also monitor the Dargle Estuary which commences in Bray Harbour. The estuary is recorded as having 'Moderate' water quality status (2016-2021) and is detailed as being under 'Review' of failing to meet the relevant Water Framework Directive (WFD) objectives by 2027.

The proposed development is located within the Ovoca-Vartry (10) Water Framework Directive (WFD) Catchment area. The proposed development lies within the Dargle\_SC\_010 sub-catchment.



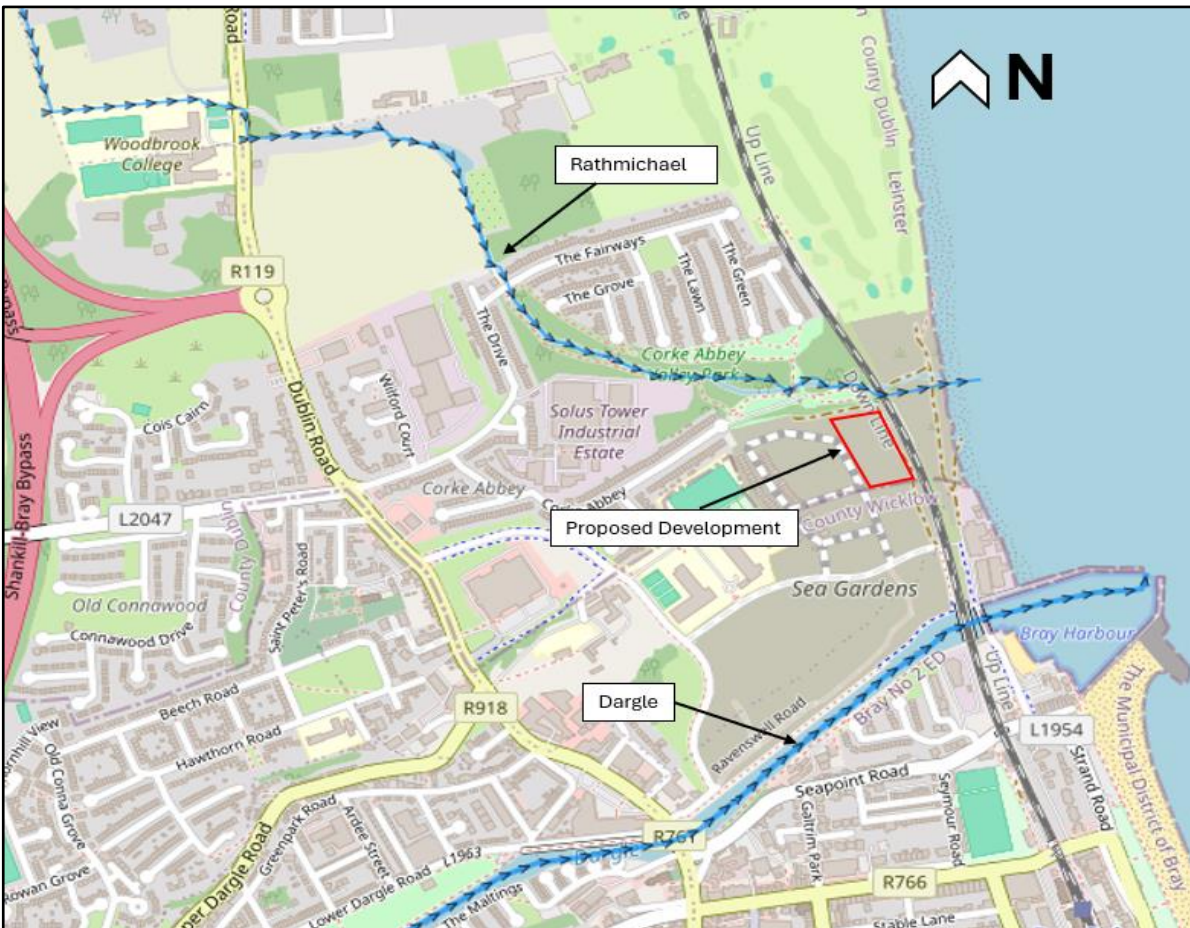


Figure 2-1 - Surface Water Features within the vicinity of the proposed development (EPA, 2025)

## 2.2 Ecology

There are no internationally designated conservation sites within the study area. The proposed development site is sufficiently remote from any European site so as to negate any potential connectivity via groundwater pathways. The proposed development site is sufficiently remote from any European site so as to preclude any potential visual effects or effects from noise or dust. The zone of influence of the development therefore includes those European sites with potential indirect connectivity via hydrological effects. There are 14 no. European sites within the potential Zone of Influence (Zoi) of the proposed development. The European sites within the Zoi of the development site are illustrated in Figures 2-2 and 2-3 below. The closest conservation site to the proposed development is Bray Head SAC located ca. 1.7km south. The proximity of the Dargle stream to the development has the potential to result in an indirect hydrological connection to designated conservation sites during the operational phase of the proposed development via the surface water drainage infrastructure which outfalls to the River Dargle and further to the Irish Sea. There will be no land take from any of the designated sites within 15km of the proposed development. Based on the findings of the Stage 1 Appropriate Assessment Screening report (AtkinsRéalis, 2025) there will be no potential significant adverse effects, either alone or in-combination, to European sites arising from the proposed development. *“the proposed Sea Gardens Block A development, either alone or in-combination with other plans or projects, will not result in likely significant effects on Rockabill to Dalkey Island SAC or Wicklow Mountains SAC or any other European site. Thus, it is recommended that it is not necessary for the scheme to proceed to Appropriate Assessment”.*

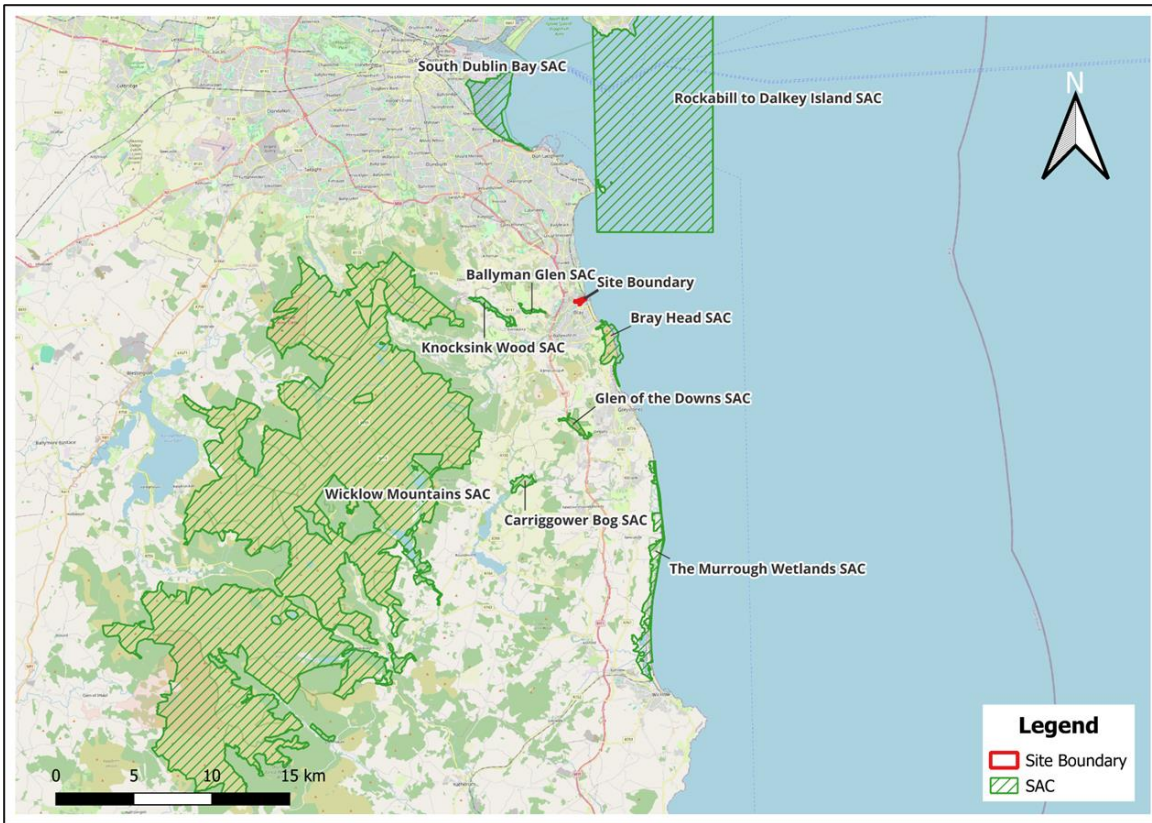


Figure 2-2 - SACs within the Zol of the proposed development

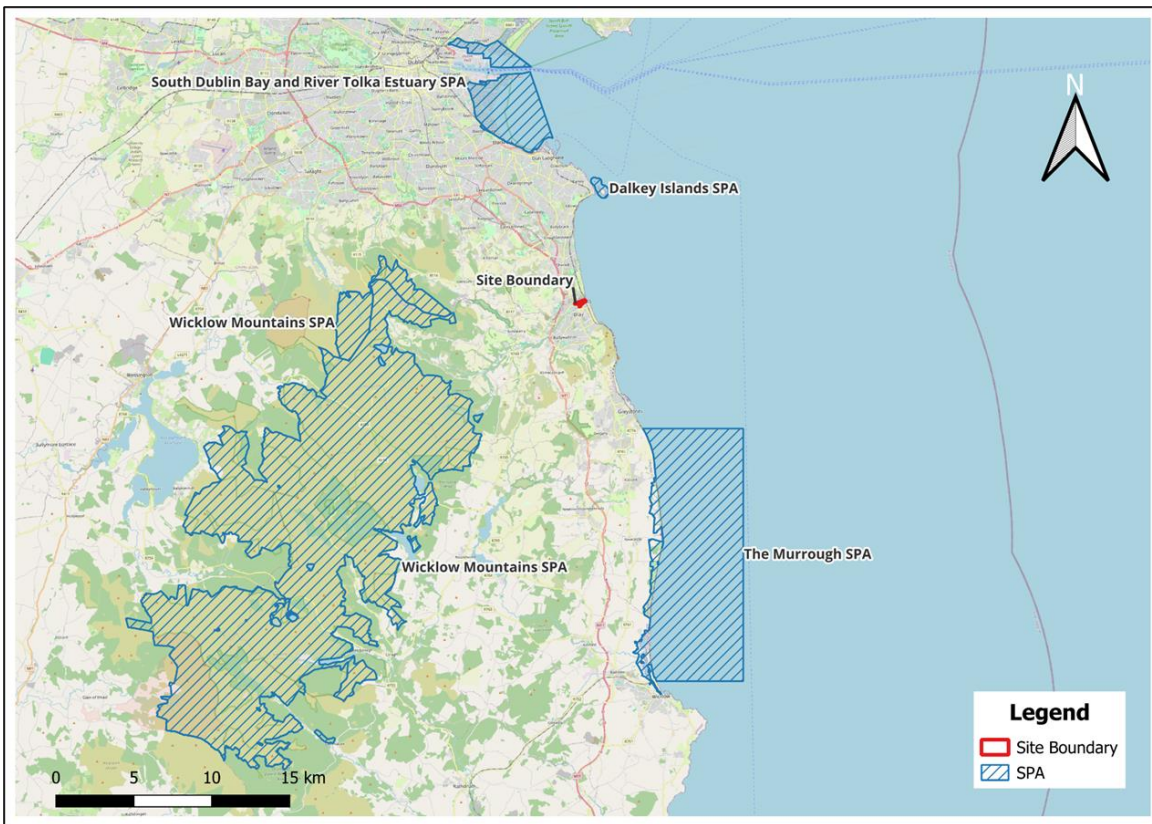


Figure 2-3 - SPAs within the Zol of the proposed development



An Ecological Impact Assessment was also carried out for the proposed development (AtkinsRéalis, 2025) which concluded *'The proposed Sea Gardens Block A development will result in the loss of small areas of grassland and 4 no. trees. The proposed development will not affect designated conservation sites, watercourses or any areas of high ecological value. Impacts to flora and fauna have mitigated for by the landscape design plan and provide for enhancement to local biodiversity. The inclusion of a detailed landscape design which is developed under the 'No Net Loss' principle has been developed as part of the planning pack for this development. The proposed development will not result in significant impacts to any protected species. Provided ecological mitigation measures are implemented correctly no significant ecological impacts are expected'*.

Site survey evidence and a review of NPWS Article 17 datasets does not identify any Annex I habitats within the proposed development site. Wicklow Mountains National Park is ca. 8.5km west from the site. Knocksink Wood Nature Reserve is ca.5km west from the site. The Glen of the Downs Nature Reserve is ca.7.6km southwest of the site.

Natural Heritage Areas NHAs are nationally designated sites which are considered important for the habitats present or which support species of plants and animals whose habitat requires protection. NHAs are legally protected under the Wildlife Amendment Act 2000. Proposed NHAs (pNHAs) are sites that are of significance for wildlife and habitats. pNHAs are not statutorily designated, however their ecological value is recognised by planning and licensing authorities. There are no NHAs or pNHAs within the proposed development site, however there are 20 pNHAs within 15km of the proposed development. Bray Head pNHA is the closest located c. 1.7km south of the site. There is no hydrological connectivity between the proposed development and Bray Head pNHA or any other pNHA.

## 2.3 Hydrogeology

There are no karst features within 10km of the proposed development (GSI, 2025). The site is within the possible area of 2 springs/wells, these are IE\_GSI\_GW\_Well\_34643 a borehole located within 1km accuracy, and IE\_GSI\_GW\_Well\_34894 a spring located within 5km accuracy. Within a further 2km of the proposed development there are 5 more wells/springs. There are no Ground Water Drinking Water Source Protection Areas within 15km of the site of the proposed development.

GSI (2025) indicates that the site is underlain by a Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones. GSI (2025) has classified the groundwater vulnerability directly beneath the proposed development as 'Moderate' with the lands further north from the site 'high' with the land further south 'low'.

The proposed development is within the Wicklow Groundwater Body (GWB) which is reported by EPA (2025) as having 'Good' WFD status for the 2016-2021 monitoring period and is 'At Risk' of failing to achieve relevant WFD objectives by 2027.

## 2.4 Soils and Geology

GSI (2025) indicates that the Bedrock Geology 100k within the vicinity of the proposed development site comprises of the Maulin Formation -Dark blue-grey slate, phyllite & schist. GSI (2025) indicates that the Teagasc Soils within the vicinity of the proposed development site comprises of 'Made Ground' with areas of 'Beach sand and gravels' located to the east and 'Alluvial' soils are located to the south. There are no recorded landslide events within the vicinity of the proposed development with the closest landslide (GSI\_LS16-0012) occurring 2km southwest from site boundary near to Hazelwood Crescent landfill which caused no apparent impact. The landslide susceptibility within the site is 'low' and 'low inferred' with the surrounding area being similar along with patches of 'made ground' (GSI,2025).

A review of GSI (2025) indicates that there are no Geological Heritage Areas (GHA) within the site. The closest GHA is DLR007 (Killiney Bay) located ca. 50m east of the proposed development and is described as *'A 5 kilometres long*

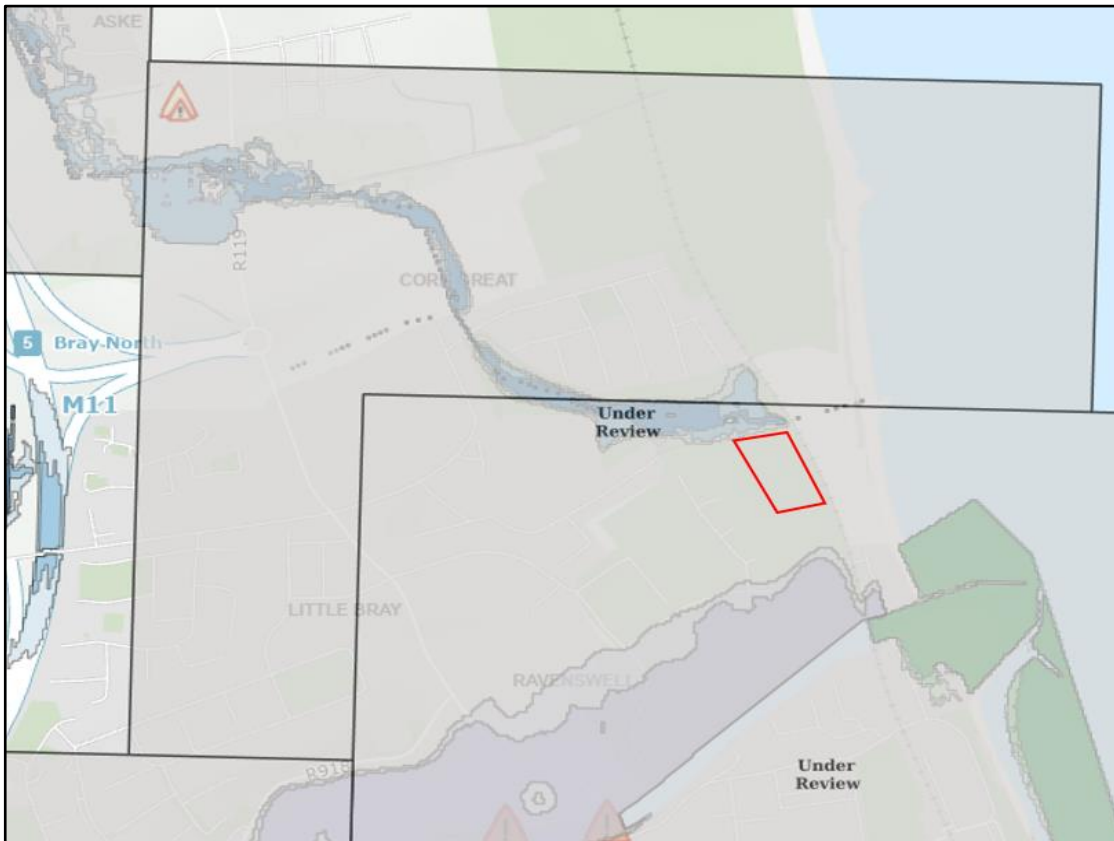


coastal section exposes a succession of several units of glacial till'. A further 2 GHA sites are located within 5km of the site which are is WW020 (Enniskerry Delta) and WW013 (Bray Head).

## 2.5 Flood Risk

The proposed development site has been assessed in accordance with the “The Planning System and Flood Risk Management” Guidelines. As part of the sequential test, the OPW flood hazard maps and the Catchment Flood Risk Assessment Maps (CFRAM) produced by the OPW were consulted.

The OPW has reported no previous recurrent or standalone flood events within the vicinity of the proposed development site (see Figure 2-4).



**Figure 2-4 - Flood Risk and Previous Flood Events Map (OPW, 2025)**

A Stage 1 Flood Risk Assessment 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.

## 2.6 Archaeology and Cultural Heritage

A search of the National Monuments Service (NMS, 2025) indicates there is a Sites and Monuments Records (SMR) listed feature located within the southern boundary of the proposed site; DU026-124---- : Linear earthwork : CORK GREAT – described as ‘a section of bank running through Bray Golf Course which may be part of the Pale Ditch. It follows the line of the county boundary and is in flat coastal terrain with views onto the Sugarloaf Mountain in the South. It is a continuous curving section of bank (L 150m) which runs on a NNE -WSW axis. It comprises a splayed, flat-topped bank (Wth at top 1.60m; Wth at base 10m; H.0.80m) and some mature Sycamores grow along the side’. This same feature is also observed in the Dún Laoghaire-Rathdown County Development Plan 2022-2028 as a listed Record of Monuments And Places – 026-124. A number of archaeological investigations of this earthwork have been undertaken including hand excavated trenches under licence from the Department of Housing, Local Government and Heritage (Excavation Licence 20E0482). These investigations concluded that the earthwork comprises of an estimated late 19th century- or early 20th -century landscape feature, and is therefore, not archaeological in origin and is not a section of the ‘Pale’ ditch as had been previously postulated by Archaeological Survey of Ireland. 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 (John Cronin & Associates, 2025).

The Sea Gardens Phase 1 lands, including the proposed development site, have previously been subject to several archaeological investigations undertaken by John Cronin & Associates. 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 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 updated commentary on the previous report concluded ‘*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).

There are no other SMRs and NIAHs (National Inventory of Architectural) within the vicinity of the proposed development however, there are some within the wider vicinity of the site as shown in Figure 2-5.



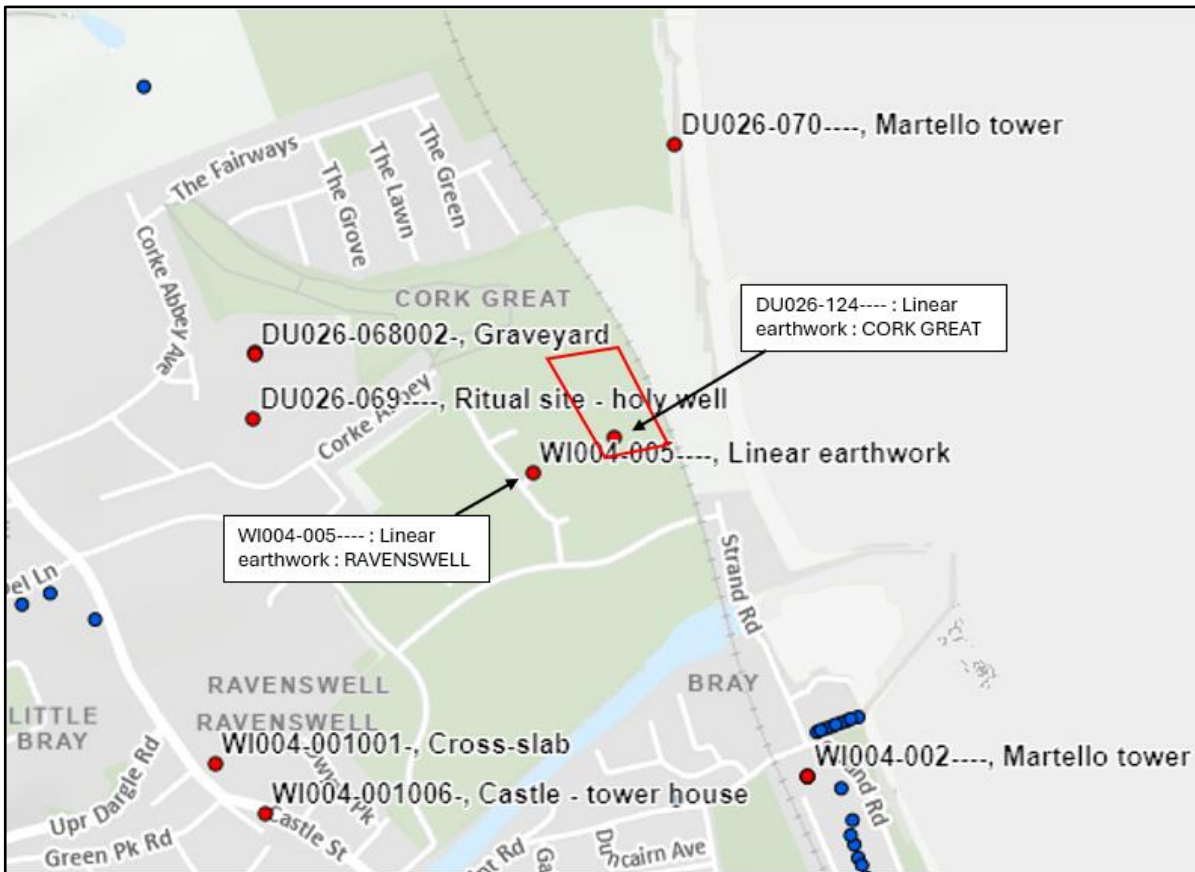


Figure 2-5 - SMRs and NIAHs within the vicinity of the proposed development (NMS,2025)

## 2.7 Population and Human Health

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). 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 1 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).



## 2.8 Material Assets

### 2.8.1 Electricity

There are no overhead lines (OHL) passing over the site (NMS, 2025). Record drawings have been provided by utility companies and reviewed in relation to the proposed development in the Utilities Report (Metec, 2025). This report states 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.

### 2.8.2 Waste Facilities

There are no industrial sites or waste facilities within the proposed site. The closest EPA licensed waste facility is the P0567 Integrated Pollution Control facility located ca. 300m west of the site. There is also an Industrial Emission Licenced facility P0129 located ca.700m southwest from the site (EPA, 2025). There are no Seveso Establishments within 15km of the study area (HSA, 2025).

## 2.9 Landscape and Visuals

There are no protected views / prospects or protected trees within the vicinity of the development and the site is not within a defined landscape character area (DLRCC).

A Landscape Report was created to accompany this submission (BSLA, 2025). The proposed landscape design strategy aims 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 centre. 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.



# 3. Description of the Proposed Development

## 3.1 Nature and Extent of the 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 detailed development description is set out in the Planning Report prepared by RPS and enclosed as part of the LRD application package.

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. The proposed development Layout Plan can be seen below in Figure 3-1.



Figure 3-1 - Proposed Site Layout Plan (Howells, 2025)



## 3.2 Construction Methodology

The following text outlines the program of works for the construction of the Sea Gardens Phase 1 Block A Large Residential Development (LRD), including the scheduling of activities to be carried out during the construction period. The program shall be designed to ensure efficient project execution while minimizing disruptions to traffic and nearby stakeholders.

Throughout the construction of the proposed development all works will comply with the relevant legislation, construction industry guidelines and best practice to avoid and minimise adverse environmental effects.

A Construction Environmental and Management Plan (CEMP) will be prepared by the Contractor and agreed with Dún Laoghaire-Rathdown County Council before commencement of the project.

Construction working hours will be the standard working hours as follows:

- 8:00am to 6:00pm Monday to Friday;
- 9:00am to 1:00pm on Saturdays; and,
- No work on Sundays and Public Holidays.

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.

The Construction period for the proposed development is anticipated to be 22 months and can be briefly summarised as follows.

- Enabling works including piling mat installation, all completed using heavy excavators.
- Substructure works include Continuous flight auger (CFA) piled foundations with in-situ reinforced concrete structural frame up to and including podium transfer slab. All constructed using piling rig, smaller excavators, dumpers and mobile cranes.
- Civil works including drainage and services installed in parallel with substructure.
- Precast reinforced concrete superstructure frame up to roof level constructed primarily using tower crane.
- Facade build up comprising of brick external leaf, with Steel Framing System (SFS) metal or concrete wall infill for internal leaf. Scaffolding around perimeter to build.
- Internal party walls will be Reinforced Concrete (RC), other walls SFS metal drylined.
- External landscaping completed last with small excavators and dumpers.

The phasing timeline for the development is as follows;

- Enabling works: Months 1-3
- Substructure: Months 4-6
- Superstructure: Months 7-9
- Envelope/Facade: Months 10-15



- Landscaping: Months 16-19,
- Interior Fitout: Months 13-18,
- Commissioning: Months 19-21
- Handover PC: Month 22.

The proposed location of the site compound is to the west of the site and can be seen in red below in Figure 3-2.



**Figure 3-2 - Site Compound Location**



# 4. EIA Screening Process

## 4.1 Desk-Based Studies

In undertaking this EIA Screening Assessment, AtkinsRéalis completed a detailed desk-based assessment using data from the following sources:

- Relevant guidance documents and legislation (listed in Section 4.3 below).
- Relevant published data from Government websites such as the EPA's Catchment website ([www.catchments.ie](http://www.catchments.ie)), the Geological Survey of Ireland ([www.gsi.ie](http://www.gsi.ie)) and Dún Laoghaire-Rathdown County Council (<https://www.dlrccoco.ie/>).
- Information supplied to AtkinsRéalis regarding the proposed development.
- Environmental Impact Assessment Report for the previous most recent submission for this site area under the Strategic Housing Development Application: ABP - 314686-22.

## 4.2 Site Visits and Assessments

Multiple visits to the Sea Gardens Masterplan site (which encompasses the Block A site) and ecological surveys were undertaken within the Masterplan site by AtkinsRéalis Senior ecologist Colin Wilson as well as ecologists Daniel Blake and Kevin Coogan from 2020 to 2025. Surveys were also undertaken by Dr Tina Aughney (2020 Bat Surveys) and John Morgan of Independent Tree Surveys (2020 & 2024). The proposed development site was more recently subject to a walkover survey on 17<sup>th</sup> February 2025 by a Senior AtkinsRéalis ecologist. 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.

The findings of these were used to support this EIA screening assessment as well as for the Appropriate Assessment (AA) Screening and Ecological Impact Assessment (EclA) which should be read in conjunction with this report. The EIA Screening Report considered the findings of other assessments conducted in the study area. This report should be read in conjunction with the following reports:

- Sea Gardens Phase 1 Block A – Appropriate Assessment Screening (AtkinsRéalis, 2025);
- Sea Gardens Phase 1 Block A – Ecological Impact Assessment (AtkinsRéalis, 2025);
- Sea Gardens Phase 1 Block A – LANDSCAPE REPORT (BSLA, 2025);
- DG0010 - Flood Risk Assessment (AtkinsRéalis, 2025);
- JCA Archaeological Commentary Letter 09/06/2025 (John Cronin & Associates, 2025);
- Sea Gardens Phase 1 Block A Architectural Design Statement (Howells, 2025);
- Sea Gardens Phase 1 Block A Planning Report (RPS, 2025);
- Site Lighting Report (Metec, 2025);
- (AWN Consulting, 2025). Inward Noise Assessment;



- Landscape and Visual Impact Assessment (Model Works, 2025);
- Utilities Report (Metec, 2025); and,
- Sea Gardens Masterplan Design Document (Howells, 2025).

### 4.3 EIA Screening Legislation and Guidance

This EIA Screening Report has been carried out to consider the requirement, or otherwise, of carrying out an environmental impact assessment (EIA) for the proposed development. The screening assessment firstly considered the requirement for a mandatory EIA and secondly the requirement for a sub-threshold EIA. The screening process followed in this report is in accordance with the EIA Directive 2011/92/EU as amended by 2014/52/EU and the national regulations transposing the Directive.

The 2011 EU Directive as amended by 2014/52/EU, on the Assessment of Public and Private Development divides projects into Annex I and Annex II projects. Annex I and Annex II projects, provided they exceed the thresholds given in the country’s national legislation, require a mandatory EIA. The Project Types listed in Annex I and Annex II of the 2011 EIA Directive were transposed into Irish Planning & Development legislation in Schedule 5 Parts 1 and Part 2, respectively. EIA Regulations ((Planning and Development) Environmental Impact Assessment) Regulations 2018 (S.I No. 296 of 2018)) transposing the 2014 EIA Directive were adopted and came into operation on 1st September 2018. These regulations amend the Planning and Development Regulations 2001 (S.I. No.600 of 2001); they seek to transpose EIA Directive 2014/52/EU and to give further effect to the 2011 Directive, as follows;

- An EIAR is required as a matter of course on specified large-scale projects which have a high likelihood of impacting on the receiving environment. These projects are listed in full within the Planning & Development Regulations (2001-2025, Schedule 5, Part 1 – Development for the purposes of Part 10.
- Each EU Member State has discretionary consideration for the requirement of an EIA in relation to Class 2 Project Types. These projects are listed in full within the Planning & Development Regulations (2001-2025), Schedule 5, Part 2 – Development for the purposes of Part 10. If the proposed project type is listed under Schedule 5, Part 2, but does not exceed the relevant stated thresholds, it is considered to be sub-threshold. Part 10, Article 92 of the Planning & Development Regulations, 2001 as amended states “sub-threshold development’ means development of a type set out in Part 2 of Schedule 5, which does not equal or exceed, as the case may be, a quantity, area or other limit specified in that Schedule in respect of the relevant class of development”. Any sub-threshold developments should be evaluated to determine if the project is likely to have a significant impact on the environment.
- Criteria to evaluate whether significant impacts on the receiving environment will arise from a Proposed Development are listed under Schedule 7 of the relevant Planning & Development Regulations (2001-2025).

A list of the relevant information to be provided by the applicant or developer for the purposes of sub-threshold EIA screening is presented in Schedule 7A of the Regulations, and summarised below;

1. Characteristics of the proposed project;
2. Location of the proposed project; and,
3. Characteristics of potential impacts of the proposed project.

Accordingly, the proposed project has been screened in accordance with the following legislation:

- EU Directive 2014/52/EU on the Assessment of the effects of certain Public and Private projects on the Environment; and,



- Planning and Development Regulations (2001-2025), including S.I. No. 296 of 2018 - European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018, which came into operation on 1st September 2018.

The following guidance documents were also reviewed:

- Section 3.2 of the 'Guidelines on the information to be contained in Environmental Impact Assessment Reports (EPA, 2022);
- European Commission (2017), Environmental Impact Assessment of Projects, Guidance on Screening;
- Department of the Environment, Heritage and Local Government (2003), Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding Sub-Threshold Developments;
- ORP Practice Note PN02 Environment Impact Assessment Screening (2021);
- Environmental Impact Directive (85/337/EEC) and all subsequent relevant amendments;
- Planning and Development Regulations (2001-2025), including S.I. No. 296 of 2018 - European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018, which came into operation on 1st September 2018; and,
- Roads Act, 1993-2024 and the European Union (Roads Act 1993) (Environmental Impact Assessment) (Amendment) Regulation 2019 (S.I. No. 279 of 2019).



# 5. EIA Screening

## 5.1 Introduction

The 2011 EU EIA Directive differentiates between those projects that automatically requires an environmental impact assessment (listed as Annex 1 projects) and those which may require an assessment if they are likely to have significant environmental effects (Annex II projects). These project types have been transposed into Irish legislation under Parts 1 and 2 respectively of Schedule 5 of the Planning and Development Regulations 2001, as amended.

The proposed development was screened using the following criteria:

- If the project is of a type listed in Schedule 5, Part 1;
- If not, whether:
  - it is listed in Schedule 5, Part 2;
  - it meets any of the relevant thresholds and criteria set out in Schedule 5, Part 2;
  - any part of it is located within sensitive area; or
  - it would be likely to have significant effects on the environment.

## 5.2 Part 1 Type Projects

EIA is mandatory for developments listed in Schedule 5, Part 1 of the of the Planning and Development Regulations 2001-2025. Schedule 5, Part 1 developments are large scale developments for which significant effects impacting on the receiving environment would be expected and comprise developments such as new airports and power stations.

**This project does not fall within any category of development requiring a mandatory EIA; hence the preparation of an EIAR is not required under Schedule 5 Part 1.**

## 5.3 Part 2 Type Projects

The project has been screened against the types of development, various processes and activities listed in Schedule 5 Part 2 of the Planning and Development Regulations 2001-2025. The project may fall within the following categories outlined in Table 5-1 which indicate that an EIA must be completed – subject to specified thresholds being met or exceeded.

**Table 5-1 – Screening for Part 2 of Schedule 5**

Class	Applicability	Screening
<b>10(b) (iv) Infrastructure developments</b>	Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.	The proposed development is ca. 1.38 hectares (ha) in area and is not located within a business district. The proposed development is below the other relevant thresholds (i.e., 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere). Hence the preparation of an EIAR is not required under Schedule 5 Part 2 (10) (b) (iv).



<b>10(b) (i)</b> <b>Infrastructure developments</b>	Construction of more than 500 dwelling units.	The proposed development currently comprises of 159no. residential units, hence does not exceed this relevant threshold and thus a mandatory Environmental Impact Assessment Report (EIAR) is not required under Schedule 5 Part 2 (10) (b) (i).
<b>10(b) (ii)</b> <b>Infrastructure developments</b>	Construction of a car-park providing more than 400 spaces, other than a car-park provided as part of, and incidental to the primary purpose of, a development.	The proposed development currently comprises of 171no. car parking provision space units, hence, does not exceed this relevant threshold and thus a mandatory Environmental Impact Assessment Report (EIAR) is not required under Schedule 5 Part 2 (10) (b) (ii).
<b>15.</b>	Any project listed in this Part which does not exceed a quantity, area or other limit specified in this Part in respect of the relevant class of development, but which would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.	Based on the nature and scale of the development, it is considered that there is no potential for significant effects on the environment, as detailed further in the following sections of this report. Hence the preparation of an EIAR is not required under Schedule 5 Part 2 (15).

As the proposed development is not a project type listed in Schedule 5 Part 1 or Part 2 of the Planning and Development Regulations 2001-2025, there is no automatic requirement under the EIA Directive for this development to be subjected to EIA. Notwithstanding this, Shankill Property Investments Limited is a responsible developer and is committed to demonstrating that the proposed development will not result in significant effects on the environment. As such, this sub-threshold EIA Screening Report has been prepared to determine whether there are likely significant environmental effects from the proposed development on the receiving environment, with regard to Schedule 7 of the Planning and Development Regulations.

## 5.4 Selection criteria for screening Schedule 7 Proposed Project

There are no exacting rules as to what constitutes “significant” in terms of environmental impacts. The responsibility is on Planning Authorities to carefully examine every aspect of a development in the context of:

- characterisation of the project;
- location of the project; and.
- type and characteristics of potential impacts.

It is generally not necessary to provide specialist studies or technical reports to complete this screening process, rather to investigate whether further studies may be required, and where risks, if any, to the integrity of the receiving environment may lie.



For the purposes of screening sub-threshold developments for EIA, all of the relevant information as presented within EIA Planning and Development Regulations 2001 as amended, (Schedule 7A) has been provided on behalf of the applicant, Shankill Property Investments Limited. The potential for the development to pose a significant impact to the receiving environment has also been evaluated in accordance with criteria listed in the Planning & Development Regulations, 2001 - 2025 (Schedule 7).

The findings of the EIA screening assessment prepared for the development has informed our professional opinion as to whether an EIAR is warranted for the proposed development, with due regard to all relevant statutory requirements and technical guidance. However ultimately it is the responsibility of the relevant planning authority to decide as to whether an EIAR is required for a particular project, based on screening conducted by the planning authority.

## 5.5 Schedule 7 Assessment

All relevant information as required under Schedule 7 and 7A has been provided on behalf of Shankill Property Investments Limited and is presented within this screening report. The potential for this development to pose a significant impact to the receiving environment has also been evaluated in accordance with criteria listed in the Planning & Development Regulations, 2001-2025 (Schedule 7), as presented within the tables below.

### 5.5.1 Characteristics of the proposed project

Table 5-2 below details the development characteristics criteria, as required under Schedule 7 of the Planning and Development Regulations 2001 as amended.

**Table 5-2 - Characteristics of the Proposed Project**

Screening Criteria	Proposed Project
	<ul style="list-style-type: none"> <li>Size and design of the project</li> </ul>
Will the size and design of the whole project be considered significant?	No. The site area is ca. 1.38ha and the project scale and nature is not considered significant within the sub-urban setting. Refer to the detailed description in Section 3 above.
	<ul style="list-style-type: none"> <li>Cumulation with other projects</li> </ul>
Will other existing projects and/or approved projects be able to affect the project.	<p>The current proposed development site will replace the previous Block A development permitted under ABP-314686 and forms part of a larger landholding within the Applicant's ownership that is currently being developed as Sea Gardens (formerly Coastal Quarter and River Quarter). This 18 hectare wider landholding is located to the west of the Dublin to Rosslare railway corridor and Bray Harbour, south of Corke Abbey Valley Park, north of the Dargle River and Bray town centre, and east of the Ravenswell school campus.</p> <p>Given the size and strategic location of the wider landholding a Masterplan Design Document has been prepared by Howells (2025). Ballymore commissioned the masterplan to guide the development of the former Bray Golf Club lands in recognition of the strategic significance and size of the landholding. It is intended as an overarching document setting out key design principles and illustrating a structured framework for the</p>



---

development of the overall landholding in a clear, logical and transparent manner as each phase is permitted and implemented.

Construction works are ongoing to the immediate west of the Block A site as Phase 1 A known as Shoreside Park is currently nearing completion with the residences having been occupied in Phases from mid-2024 (Ref. ABP-311181-21). Therefore, the proposed development (Block A) will be carried out in a consecutive manner and will not run concurrently with the existing Shoreside park phase of development. It is not anticipated to have any cumulative effects with the construction of Block A.

The proposed development at the adjacent site directly to the south; Block B, will be subject to a future planning application and therefore it is not likely that both Block A and B will be constructed at the same time. It is also noted that the combined number of residential units between Block A and B are 334 so still cumulate to a minor housing development.

Phase 2 referred to as River Quarter Phase 2, has been recently submitted to Wicklow County Council for planning permission and is located ca. 125m south of Block A. A comprehensive EIAR was submitted as part of this application which verified that no likely significant effects to the receiving environment will occur. Phase 2 is expected to start construction 6 months after granted permission.

Finally Phase 3, located directly south of Phase 2 ca. 230m from Block A, marks the final stage of the Sea Gardens masterplan, and will be submitted as a future planning application. Based on current programme Block A construction will be complete in advance of the commencement of Phase 3 construction.

Operational phase cumulative effects as a result of the development of the masterplan lands will likely be not significant given that the design and environmental assessment of each phase of the masterplan development have considered the masterplan lands as a whole. For example, a Daylight and Sunlight Assessment has been prepared for the development accompanying this submission (3DDB, 2025). The report examined the level of impact from a daylight and sunlight perspective that the updated design would have on the granted SHD 2 Block B (ABP -314686-22) as well as the currently under construction duplexes to the west and concluded that the scheme is performing favourably from a daylight and sunlight perspective.

A search of the Dún Laoghaire-Rathdown County Council's (DLRCC) and Wicklow County Council's (WCC) Planning Applications, An Coimisiún Pleanála planning portal (ACP) and the Uisce Éireann project portals has been undertaken for the applications submitted within the past 5 years in 1km of the vicinity of the proposed development (last reviewed 24/06/2025). For the purposes of this study, only significant new developments that are likely to generate a significant number of trips and developments that may encroach nearby to the proposed development have been considered, as follows:

- 
- D25A/0060/WEB (DLRCC): Permission for (1) the construction of a 2-storey extension (2,430 sq. m. floor area) to Building 2 - eaves height of proposed extension will match existing eaves of Building 2; (2) the removal of an earth mound (c. 80m long x c. 20m wide x c. 2.5m high) and the realignment eastwards of internal circulation road and 24 no. car parking spaces; and (3) the relocation of 8 no. EV parking spaces, all at the rear of Building 2; (4) the relocation of 2 no. silos to the north side of the extension; and (5) the construction of additional covered bicycle parking (20. no. spaces), 1.6m high wall and railing on new retaining wall between overflow car park and realigned circulation road, 1.2m high railing to hard landscaped area, landscaping and all ancillary and associated works. (Granted, 2025).
  
  - D21A/0654 (DLRCC): Permission for development comprising of the expansion and reconfiguration of the existing Lidl premises and associated external and site works and development. The proposed development comprises: 1) The demolition of enclosed former entrance porch area (to the front / southwest elevation) of the existing structure at upper ground floor level and existing external staircase to south east elevation at lower and upper ground floor level; 2) The modification of the front / southwest elevation to the Dublin Road, with revised glazing, cladding and signage arrangement; 3) The extension of the building to the south east at lower and upper ground level including to enclose / internalise the existing canopied / covered traveller area and associated landing and trolley storage areas, along with provision of internal elevator and staircase (superseding previous Lanning Permission Ref: D20A/0769), with associated changes to elevations and provision of signage; 4) The expansion of the existing Lidl store (licenced) footprint within the former Industrial Yarns building; 5) An associated reconfigured internal layout and increased net sales area; 6) Revised site and car parking layout including provision of external plant compound and bin cage, removal of external compactor, extended ramp access along south west elevation, revised emergency exits to south west and south east elevations; and 7) All associated and ancillary works and development (2022, granted).
  
  - D22A/0574 (DLRCC): Permission for the installation of 3,225 no. solar photovoltaic (PV) panels comprising an area of 5,965 sq. metres at roof level on the existing facility buildings and all ancillary and associated works (granted, 2022).
  
  - 21869 (WCC): Part 8 - Process for the Bray Sustainable Transport Bridge Project - The proposed bridge and link road will consist of a two-lane public transport road 3.25m wide and variable width pedestrian, cyclist and shared path facilities. A new pedestrian boardwalk is proposed along the southern bank wall to link the existing walkway to the bridge crossing (application, 2021).
  
  - 313442 (ACP): Demolition of all existing vacant commercial buildings (Heiton Buckley site) and vacant residential buildings (St. Anthony's & 20 Dwyer Park) and sections of boundary wall; Construction of a mixed use residential and commercial development in 2 primary blocks (A and B)
-

---

ranging in height from 1 to 7 storeys set around a central, podium level amenity space and a separate single storey pavilion building along Castle Street; The residential element will accommodate 139 no. apartments comprising 33 no 1 bedroom units, and 15 no. 3 bedroom units, with associated balconies; Block A (3-7 storeys) will accommodate 93 no. residential at ground to 6th floor, with creche, bicycle store, substation, bin storage and plant rooms at ground floor; Block B (1-6 storeys) fronting Castle Street will accommodate 46 no. apartments at 1st to 5th floor , with 2 no. retail/non retail service/restaurant units, communal residents room and bin storage at ground floor level; separate street level single storey pavilion building will accommodate community facility on Castle Street; Vehicular access from Castle Street to 59 no. undercroft car parking spaces and 3 no. creche drop off spaces with footpath access route to creche; Principal pedestrian and cyclist access from Castle Street with secondary access from Dwyer Park; New surface water sewer extending along Castle Street from the site to River Dargle at Bray Bridge; Landscaped communal open spaces, boundary treatments, bicycle parking, signage, loading bay at Dwyer Park and all associate site works and services (Application, 2022).

- 2460793 (WCC): construction of a mixed-use building ranging in height from 4 to 6 storeys and accommodating 2 no. retail/café units fronting Castle Street and 29 no. apartments at ground to 5th floor levels. The development will include: A mix of 19 no. 1-bedroom and 10 no. 2-bedroom apartments all with private terraces/balconies; Communal open space to the rear at surface level; Communal terrace at fifth floor roof level; 13 no. car parking spaces and 60 no. cycle parking spaces; Vehicular and pedestrian access from Castle Street; Bin stores, landscaping and all associated site works and services (Conditionally granted, 2025).
- 317742 (ACP): BusConnects Bray to City Centre Core Bus Corridor Scheme (granted, 2025).
- 309613 (ACP): Demolition of single storey structure. Change of use to residential/apartment use, totalling 54. Construction of 2 floors above building. Construction of 6 storey building as an extension (granted, 2022).
- ABP30584419 (ACP): Aeval Ltd; A planning permission for a strategic housing development on a site of 21.9 hectares generally bounded by the Old Dublin Road (R119) and St. James (Crinken) Church to the west, Shanganagh Public Park and Shanganagh Cemetery to the north, Woodbrook Golf Course to the east and Corke Lodge and woodlands and Woodbrook Golf Clubhouse and car park to the south. The proposed development is within the townlands of Cork Little and Shanganagh, Shankill, County Dublin (Granted, 2020).
- 22188 (WCC): Shankill Property Investments Ltd; Demolition of 4 light industrial/commercial buildings including their extensions, change of use from light industrial/commercial to residential use, and the construction of a total of 54 no. apartment units across 2 no. blocks



- ACP – 306583 (ACP): Dún Laoghaire Rathdown County Council; A residential development with ancillary commercial uses (retail unit, café and crèche) partially comprising a "Build to Rent" scheme on circa 9.69 hectares.
- LRD24A/0482/WEB (DLRCC): Castlethorn Management Services UC Castlethorn Management Services UC Intends to apply for a Permission for a Large-Scale Residential Development comprising amendments to the permitted Strategic Housing Development (An Coimisiún Pleanála Ref. ABP-305844-19 – Woodbrook Phase 1) (Granted, 2024).
- LRD24A/0382/WEB (DLRCC): Aeval Unlimited Company. The proposed development is referred to as Woodbrook Phase 2 and consists of 479no. dwellings in a mixture of terraced and semi-detached houses, duplexes and apartments and a Neighbourhood Centre, ranging in height from 1 – 7 storeys.
- D18A/0606 (DLRCC): Uisce Éireann Permission is sought for provision of water supply infrastructure. The development will consist of: A 10 year permission to facilitate construction in two phases.

Based on the nature and scale of the development, outlined in Section 3 above, and based on the fact that construction mitigation measures will be implemented for the proposed development, no significant cumulative effects are anticipated.

- Nature of any associated demolition works

Will the construction of the project include any significant demolition works?	No. There are no demolition works proposed for the proposed development.
--	--

- Use of natural resources

Will construction or operation of the project use natural resources above or below ground which are non-renewable or in short supply?	The development of the site will require earthworks involving the movement of soil material and excavation of subsoil. The use of natural resources will be modest and not to the scale that requires and EIAR. 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. The use of natural resources will be kept to a minimum.
---	---

- Production of waste

Will the project produce wastes during construction or operation or decommissioning?	The construction phase of the proposed development will likely generate typical construction waste such as concrete, soil and subsoil, electrical cables off cuts, plastic, timber pallets, and green wastes. All wastes will be collected and segregated by the Contractor before removal off site for recycling/disposal. Containment of fluid for all works including fuel storage is to be suitably banded and compounded. It is noted that there are a number
--	--



---

of open drainage channels in the area, the contractor is to be aware of the risk of contamination into the drainage channels.

Construction waste will be kept to a minimum with only contaminated waste being removed off site. The following waste streams will be produced during the construction:

- Waste produced by the excavation of the site
- Generic construction waste.

The proposed development will involve excavation to facilitate the foundation for the residential developments. All soil requiring disposal offsite will require waste classification in accordance with EPA requirements as set out in the documents 'Waste Classification List of Waste & Determining if Waste is Hazardous or Non-hazardous' (EPA, 2015), and 'Determining if waste is hazardous or non-hazardous' (EPA, 2018), and all relevant waste management legislation. In addition to screening against relevant WAC, the preparation of a waste classification tool (HazWaste online / EPA paper tool or similar etc.) will be required to be carried out in order to determine the relevant LoW / EWC code for the transport of any waste soils which require offsite removal and disposal.

- 
- Pollution and nuisances

---

Will the project release any pollutants or any hazardous, toxic or noxious substances to air?

Standard temporary construction emissions and nuisances including noise, dust and traffic will arise during the construction phase. These emissions will be mitigated by the adherence to the mitigation measures set out in the Construction Environmental Management Plan (CEMP) that will be submitted to Dún Laoghaire-Rathdown County Council for their approval in advance of construction starting at the site.

Regional air quality in the vicinity of the proposed development is '3/good' (EPA, 2025). The closest Air Quality Monitoring Station to the proposed development is station 13 Bray, Co. Wicklow located ca. 2.8km southwest of the site. Management of dust will be in line with relevant best practice measures such as those set out in 'Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes' (NRA, 2011). Construction traffic emissions and dust from material delivery and removal, and earthworks will be kept to a minimum. Dust management measures will be set out in the CEMP. Stockpiles of material will be dampened during periods of extended dry weather. Due to the nature and scale of the development detailed in Section 3, it is anticipated that the construction works, and operation of the development will not have a significant effect on air quality.

- 
- Will the project cause:

---

Noise and vibration.

Noise levels will not exceed the indicative levels of acceptability for construction noise in an urban environment as set out in the NRA guidance 'Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes' (NRA, 2014). 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. Noise generated during the construction phase is not expected to cause a significant increase in ambient noise levels to sensitive receptors located near to the site while construction is taking place. However, mitigation measures will be in place such as noise barriers will be put in place to prevent this. Works will be scheduled during day-time hours. Construction contractors will be required to comply with the requirements of the European Communities (Construction Plant and Equipment) (Permissible Noise Levels) Regulations, 1988 as amended in 1990 and 1996 (S.I. No. 320 of 1988, S.I. No. 297 of 1990 and S.I. No. 359 of 1996), and the Safety, Health and Welfare at Work (Control of Noise at Work) Regulations, 2006 (S.I. No. 371 of 2006). Due to the nature and scale of the proposed development, detailed in Section 3 it is anticipated that the construction works, and operation of the works will not have a significant effect with regards to noise.

Release of light.	Lighting features will be installed as part of the proposed development. When designing the proposed site lighting scheme, consideration will be given to best practice as outlined in Guidance Note 08/23; Bats and Artificial Lighting at Night - Institute of Lighting Professionals; with regards to reducing impact on bat population. The Site Lighting Report (Metec, 2025) concluded <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> .
-------------------	--

Heat.	The proposed development will not cause release of heat.
-------	--

Energy.	The proposed development will not generate energy.
---------	--

Electromagnetic radiation.	The proposed development will not cause release of electromagnetic radiation.
----------------------------	---

Will the project lead to risks of contamination of land or water from releases of pollutants, including leachate, onto the ground or into surface waters, groundwater, coastal waters or sea?	The potential for accidents or incidents causing oil and chemical spillages are limited. With the adoption of site-specific risk management and remediation measures, as appropriate, during construction, no adverse impacts will arise and the residual effects on sensitive receptors will not be significant. Excavation works will be monitored and in the event that contaminated materials are encountered these will be segregated from uncontaminated soils, temporarily stored (any stockpiles will be lined and covered by heavy duty 1000-gauge plastic), sampled and analysed for relevant parameters (Waste Acceptance Criteria suite e.g., Rilta Disposal Suite). Any contaminated soils will be characterised as per the requirements of the relevant Waste Acceptance Criteria (WAC) under the relevant European Communities Council Decision (EC) (92003/33/EC). The waste material will be classified in accordance with the requirements of the EPA as set out in the following documents 'Waste Classification List of Waste & Determining if Waste is Hazardous or Non-hazardous' (EPA, 2018). Any
---	--



---

contaminated soils will be transported by appropriately permitted hauliers and disposed of to an appropriate EPA licensed Waste Facility in accordance with all relevant waste management legislation. Waste disposal records will be maintained by the Contractor.

There are no watercourses in the immediate vicinity of the development reducing the likelihood of pollutants entering any water streams.

- 
- Risk of major accidents and/or disasters relevant to the project concerned

---

Will there be any risk of major accidents (including those caused by climate change, in accordance with scientific knowledge) during construction, operation or decommissioning?

Ireland in general is at low risk of natural disasters: earthquakes are rare and of low magnitude, there are no active volcanos, and severe weather events are rarely experienced. Flooding is experienced throughout Ireland on a regular basis.

A Stage 1 Flood Risk Assessment was conducted by AtkinsRéalis (2025) 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 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.

Possible accidents relevant to the development include vehicle collisions and fire, for both of which there will be plans in place to minimise the risk of harm caused by emissions or discharges.

Major accidents affecting the development include generic risk of fire or explosion.

All these events will be covered by risk assessments and contingency plans which apply to the proposed development. In the event of accidents or fire, measures will be in place to limit emissions to land, water and air, as far as practicable.

With these arrangements in place the impact of emissions on human health and sensitive receptors in general would be mitigated such that adverse impacts would be unlikely to arise in the event of an accident.

Is the location susceptible to earthquakes, subsidence, landslides, erosion, or extreme /adverse climatic conditions, e.g., temperature inversions, fogs, severe winds, which could cause the project to present environmental problems?	The location is not susceptible to earthquakes, subsidence, landslides, erosion, or extreme/adverse climatic conditions. A Flood Risk Assessment has been prepared (AtkinsRéalis, 2025) which concluded that the site is in Floodzone C, low probability of flooding.
--	---

- The risks to human health

Will the project present a risk to the population (having regard to population density) and their human health during construction, operation or decommissioning? (for example, due to water contamination or air pollution)	<p>Construction will be undertaken in accordance with the commitments to be set out in a site-specific CEMP prepared by the appointed Contractor, such that no significant construction effects on construction workers, residents and the environment will arise.</p> <p>Given the nature of the works effects on population during operation, from water contamination, noise and vibration or air quality and climate are not anticipated to be significant. The development will have an overall positive impact to the population of Bray and the surrounding area as it will provide more available accommodation for people and families to live.</p>
--	--

## 5.5.2 Location of the Project

Schedule 7 of the Planning and Development Regulations 2001 as amended, requires a description of the location of the proposed project, with regards to the environmental sensitivity of the geographical area likely to be affected by the development. Table 5-3 below details the criteria considered and provides an assessment relating to same.

**Table 5-3 - Location of the Proposed Project**

Screening Criteria	Proposed Project
<ul style="list-style-type: none"> <li>• Existing and approved land use</li> </ul>	
Are there existing or approved land uses or community facilities on or around the location which could be affected by the project?	The proposed development is located within the former Bray Golf Club lands north of the Dargle River and Bray town centre. 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)



---

The construction of the development is unlikely to have significant effect on the surrounding area. A CEMP will be produced to identify potential environmental issues and control measures for their avoidance/mitigation. The contractor will inform and work with all stakeholders to address concerns. Control measures to avoid/mitigate impacts will be included in the CEMP.

No existing, approved land uses for health, education, or community facilities in general, on, or around, the location will be affected by the proposed development.

Sensitive receptors nearby 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), none of which are expected to be significantly affected.

The construction, operation or decommissioning of the development will not involve actions which will cause significant physical changes in the topography of the area.

- 
- The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground

---

Are there any areas on or around the location which contain important, high quality or scarce resources which could be affected by the project?

The materials which are being imported for the development 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.

The AA Screening Report (AtkinsRéalis, 2025) confirms that there is no risk of direct impacts on any of the designated sites within the Zol *'the proposed Sea Gardens Block A development, either alone or in-combination with other plans or projects, will not result in likely significant effects on Rockabill to Dalkey Island SAC or Wicklow Mountains SAC or any other European site. Thus, it is recommended that it is not necessary for the scheme to proceed to Appropriate Assessment.'*

As noted above, excavation works will be monitored and in the event that contaminated materials are encountered these will be segregated from uncontaminated soils, temporarily stored (any stockpiles will be lined and covered by heavy duty 1000-gauge plastic), sampled and analysed for relevant parameters

---



---

(Waste Acceptance Criteria suite e.g., Rilta Disposal Suite). Any contaminated soils will be characterised as per the requirements of the relevant Waste Acceptance Criteria (WAC) under the relevant European Communities Council Decision (EC) (92003/33/EC). The waste material will be classified in accordance with the requirements of the EPA as set out in the following documents 'Waste Classification List of Waste & Determining if Waste is Hazardous or Non-hazardous' (EPA, 2018). Any contaminated soils will be transported by appropriately permitted hauliers and disposed of to an appropriate EPA licensed Waste Facility in accordance with all relevant waste management legislation. Waste disposal records will be maintained by the Contractor.

---

- Absorption capacity of the natural environment
- 

Are there any other areas on or around the location which has the potential to impact on the absorption capacity of the natural environment, paying particular attention to wetlands, riparian areas, river mouths?

An AA Screening (AtkinsRéalis, 2025) prepared for the development concluded that *'the proposed Sea Gardens Block A development, either alone or in-combination with other plans or projects, will not result in likely significant effects on Rockabill to Dalkey Island SAC or Wicklow Mountains SAC or any other European site. Thus, it is recommended that it is not necessary for the scheme to proceed to Appropriate Assessment.'*

An EclA was also carried out for the proposed development (AtkinsRéalis, 2025) which concluded *'The proposed Sea Gardens Block A development will result in the loss of small areas of grassland and 4 no. trees. The proposed development will not affect designated conservation sites, watercourses or any areas of high ecological value. Impacts to flora and fauna have mitigated for by the landscape design plan and provide for enhancement to local biodiversity. The inclusion of a detailed landscape design which is developed under the 'No Net Loss' principle has been developed as part of the planning pack for this development. The proposed development will not result in significant impacts to any protected species. Provided ecological mitigation measures are implemented correctly no significant ecological impacts are expected.'*

Based on the location of the proposed development, there is some potential for impact on the absorption capacity of the natural environment via the nearby hydrological network. There are no watercourses in the immediate vicinity of the proposed development, however, there are 2 rivers that run directly into the Sea less than 250m from the site. The closest water feature to the proposed development is the Rathmicheal River which is ca.25m north of the proposed development, ca.100m before the river discharges into the Southwestern Irish Sea - Killiney Bay coastal waterbody. The Dargle river is located ca. 230m south of the proposed development, ca. 300m before the river discharges into the Dargle Estuary at Bray Harbour and subsequently the Southwestern Irish Sea - Killiney Bay coastal

---



	waterbody. There is no direct connection between the development site and any SACs or SPAs.
Has the project the potential to impact on the absorption capacity of the natural environment, paying particular attention to coastal zones and the marine environment?	The proposed development is located ca. 100m inland and is in close proximity to the coastline, separated by the Dublin-Wexford/Rosslare railway line. It is not anticipated that it will have a significant impact on the coastal zone or marine environment.
Has the project the potential to impact on the absorption capacity of the natural environment, paying particular attention to mountain and forest areas?	There are no mountain areas within 2km of the proposed development and therefore no impacts on this habitat type. There are no protected trees within the vicinity of the site (DLRCC). There are a few protected trees in close proximity to the site within a small, forest area in the Corke Abbey Valley Park located ca. 20m directly north of the site. The proposed development is not expected to negatively impact this habitat. The 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.
Has the project the potential to impact on the absorption capacity of the natural environment, paying particular attention to areas classified or protected under national legislation; Natura 2000 areas designated by Member States pursuant to Directive 92/43/EEC and Directive 2009/147/EC?	<p>A screening for Appropriate Assessment (AA) has been prepared for the works (AtkinsRéalis, 2025) which investigated the potential for the proposed development to have significant effects on a European Site(s) either alone or in combination with other plans or developments.</p> <p>The AA screening concluded that there is no absorption capacity of the natural environment under national legislation.</p> <p>An AA Screening (AtkinsRéalis, 2025) prepared for the development concluded that <i>'the proposed Sea Gardens Block A development, either alone or in-combination with other plans or projects, will not result in likely significant effects on Rockabill to Dalkey Island SAC or Wicklow Mountains SAC or any other European site. Thus, it is recommended that it is not necessary for the scheme to proceed to Appropriate Assessment.'</i></p>
Has the project the potential to impact on the absorption capacity of the natural environment, paying particular attention to areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure?	<p>The absorption capacity of the natural environment is characterised as follows:</p> <p>The area around the proposed development is sub-urban in nature.</p> <p>There are 14no. European Sites within the potential zone of influence of the proposed development, none of which are expected to be significantly impacted by the proposed</p>



---

development. Based on the nature, scale and location of the proposed development as detailed in section 3, there is no potential for impact on absorption capacity of the natural environment and the development will not cause significant effects.

The town of Bray is surrounded by lots of local history including numerous Sites and Monuments Record (SMR) features and National Inventory of Architectural Heritage (NIAH) features. There is one NIAH in the immediate vicinity of the proposed development; DU026-124---- : Linear earthwork: CORK GREAT. A number of archaeological investigations of this earthwork have been undertaken, these investigations concluded that the earthwork comprises of an estimated late 19th century- or early 20th -century landscape feature, and is therefore, not archaeological in origin and is not a section of the 'Pale' ditch as had been previously postulated by Archaeological Survey of Ireland. 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 (John Cronin & Associates, 2025). The updated commentary on the previous assessment of the site concluded *'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).

The development is located within the Ovoca-Vartry (10) Hydrometric area/ Water Framework Directive (WFD) Catchment area. There are no watercourses located in the immediate vicinity of the development, however there are 2 within 250m from the site. The closest water feature to the development is the Rathmicheal river which is located ca.25m north of the proposed development, ca.100m before the river discharges into the Southwestern Irish Sea - Killiney Bay coastal waterbody. The River Rathmicheal has a 'Good' status for the 2016-2021 monitoring period and is 'Not at Risk' of failing to meet relevant Water Framework Directive (WFD) by 2027. The Dargle river is located ca. 230m south of the proposed development, ca. 300m before the river discharges into the Dargle Estuary at Bray Harbour and subsequently the Southwestern Irish Sea - Killiney Bay coastal waterbody. The River Dargle has a 'Good' status for the 2016-2021 monitoring period, is 'Not at Risk' of failing to meet relevant Water Framework Directive (WFD) by 2027 and its latest River Q value (2025) taken ca. 1.2km southwest/upstream from the

---

development was 4/good from station RS10D010270 (EPA, 2025).

Leaching of pollutants to groundwater is a risk during the construction phase, however, best practice measures will be employed through adherence to the CEMP which will be prepared and accidental spills will be dealt with through prescribed spill response measures.

<p>Has the project the potential to impact on the absorption capacity of the natural environment, paying particular attention to densely populated areas?</p>	<p>No. There is no significant effect on the absorption capacity of the natural environment in relation to densely populated areas as a result of the proposed development.</p>
---	---

<p>Has the project the potential to impact on the absorption capacity of the natural environment, paying particular attention to landscapes and sites of historical, cultural or Archaeological significance?</p>	<p>As discussed above, within the site boundary of the proposed development is located DU026-124---- : Linear earthwork: CORK GREAT. A number of archaeological investigations of this earthwork have been undertaken these investigations concluded that the earthwork comprises of an estimated late 19th century- or early 20th -century landscape feature, and is therefore, not archaeological in origin. The updated commentary on the previous assessment of the site concluded <i>'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'</i> (John Cronin &amp; Associates, 2025).</p>
---	---

There is no potential for impact on the absorption capacity of the natural environment.

### 5.5.3 Characteristics of potential impact

Table 5-4 below details the types and characteristics of potential impacts of the scheme as required under Schedule 7 of the Planning and Development Regulations 2001 as amended.

**Table 5-4 - Characteristics of the proposed project**

Screening Criteria	Proposed Project
<ul style="list-style-type: none"> <li>The magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected)</li> </ul>	<p>The spatial extent of the proposed development measures ca. 1.38 hectares. The expected duration of the construction works is approximately 22 months. The types of development identified within the vicinity of the proposed development are the nearby residential estates, Bray Harbour (240m), Progress Electroplating &amp; 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,</p>



---

Ravenswell (405m), Ravenswell Primary School (290m) and Coláiste Ráithín Secondary School (170m). Direct effects associated with the development are likely to be located within the environs of the site, chiefly associated with effects on pedestrians and vehicular movement. Traffic management will be implemented during construction to minimise disruption to traffic flow. Due to the nature of the proposed development it is unlikely that the resident population will be affected by the development.

---

- Nature of the impact
- 

Outline the nature of the impact.

There will be temporary effects on noise, air quality and traffic during the construction of the residential development. This has potential to result in noise and air quality impacts but with the implementation of the control measures included in the CEMP it is unlikely that the effects will give rise to significant environmental effects. Potential adverse operational impacts of the development are not expected. The design is developed to reduce visual impacts, this can be seen in the Architectural Design Statement (Howells, 2025), the Landscape and Visual Impact Assessment (Model Works, 2025) and the Verified Views (3DDB, 2025).

Sources of hydrocarbon input include leaks of substances such as fuel, e.g., petrol or diesel, or lubricating oil from vehicles, plant or equipment, that may discharge to groundwater or the nearby streams. The CEMP has sufficient mitigation measures such as bunding etc. to prevent discharge of hydrocarbon to surface water or groundwater. Shankill Property Investments Limited will engage with stakeholders including the nearby residents and commercial, premises throughout the design and construction stages to address any concerns.

---

- Transboundary nature of the impact
- 

Is the project likely to lead to transboundary effects?

Given the location of the site no transboundary impacts would occur.

---

- The intensity and complexity of the impact
- 

Outline the intensity and complexity of the impact.

The impacts identified are unlikely to cause significant changes in environmental conditions within the site and surrounding area.

---

- The probability of the impact
- 

Outline the probability of the impact.

During construction, conventional construction and best environmental practice techniques can be readily deployed. In order to minimise disruption, a CEMP will be implemented.

There is no significant environmental effect during the operational phase anticipated, the proposed development will have an overall positive effect as it will provide additional family housing to be available for the large population of Bray and the surrounding area.

---



- 
- The expected onset, duration, frequency and reversibility of the impact
- 

Outline the expected onset, duration, frequency and reversibility of the impact.

It is expected that the duration of construction works will be approximately 22 months. Standard working hours during the construction period are expected to be Monday to Friday 08:00 to 18:00, and Saturday 09:00 to 13:00. During the construction stage it may be necessary to carry out some work outside of normal working hours however, this will be kept to a minimum and only undertaken following approval from Dún Laoghaire-Rathdown County Council.

The noise and air quality impact peaks during construction will be intermittent with a potential background level of nuisance as they will depend on the construction activities which are for their nature variable and not continuous.

It is not expected that noise levels will be significant during the operational stage.

The selection and implementation of established best practice procedures as set out by the appointed Contractor will ensure potential environmental impacts during the construction phase are not significant.

---

- Cumulation of the impact with the impact of other existing and/or approved development
- 

Could this project together with existing and/ or approved project result in cumulation of impacts together during construction/ operation phase?

As discussed previously, the greater Sea Gardens Masterplan nor any other approved developments in the vicinity are anticipated to result in any cumulative impacts.

---

- Possibility of effectively reducing the impact
- 

What measures can be adopted to avoid, reduce, repair or compensate the impact?

During construction the effects of the proposed development will be further reduced through the implementation of the CEMP. During operation, potential effects will be reduced by the inclusion of design measures and operational control plans.

---



## 6. Potential for Significant Effects on the Receiving Environment

All relevant information as required under Schedule 7A has been provided on behalf of the client and is presented within Section 5 of this screening report. The potential for this development to pose a significant impact to the receiving environment has also been evaluated in accordance with criteria listed Planning and Development Regulations (2001-2025) (Schedule 7).

It is considered that due to the size, nature, and characteristics of the proposed development, no significant effects on the receiving environment are expected; hence the preparation of a sub-threshold EIAR is not required.



# 7. Screening Conclusion

This EIA screening report has been carried out in accordance with the Planning and Development Regulations as amended 2001- 2025 (which give effect to the provisions of EU Directive 2014/52/EU). The report assessed the effect of the proposed development in conjunction with committed developments in the surrounding area.

Based on all available information, and taking account of the scale, nature and location of the proposed development it is our opinion that the preparation of an EIAR is not a mandatory requirement (under Schedule 5, Part 1 and 2 of the Planning and Development Regulations 2001 - 2025). The project is deemed a sub-threshold development; hence the potential for significant environmental effects arising as a result of the works has been evaluated, in accordance with the requirements of Schedule 7A and Schedule 7 of the Planning and Development Acts 2001-2025. However, Dún Laoghaire-Rathdown County Council, as the competent authority will ultimately determine whether an EIA is required or not.

Key findings are summarised as follows;

- Due to the limited nature of the development and taking into account likely future project timelines across the entirety of the Sea Gardens Masterplan it is considered that there will be no significant cumulative impacts with other developments in the general area;
- Limited noise, vibration and dust emissions may be generated during construction; however, this is anticipated to be minimal in effect and will cause no significant impacts;
- There will be no significant impact on biodiversity, groundwater, surface water or traffic; and,
- There will be no significant impacts on recorded monuments or historic features.

In summary, no significant adverse impacts to the receiving environment will arise as a result of the proposed development.

Accordingly, we consider that the preparation of an EIAR is not required for the proposed Large-scale Residential Development at Sea Gardens Phase 1 Block A, Bray, Co. Dublin. However, the competent authority will ultimately determine whether an EIAR is required or not.



AtkinsRéalis



**AtkinsRéalis Ireland Limited**  
150-155 Airside Business Park  
Swords  
Co. Dublin  
K67 K5W4

© AtkinsRéalis Ireland Limited except where stated otherwise