Comhairle Contae Fhine Gall Fingal County Council

An Roinn um Pleanáil agus Infrastruchtúr Straitéiseach Planning and Strategic Infrastructure Department



SEA STATEMENT FOR STRATEGIC ENVIRONMENTAL ASSESSMENT

DUBLIN AIRPORT CENTRAL MASTERPLAN

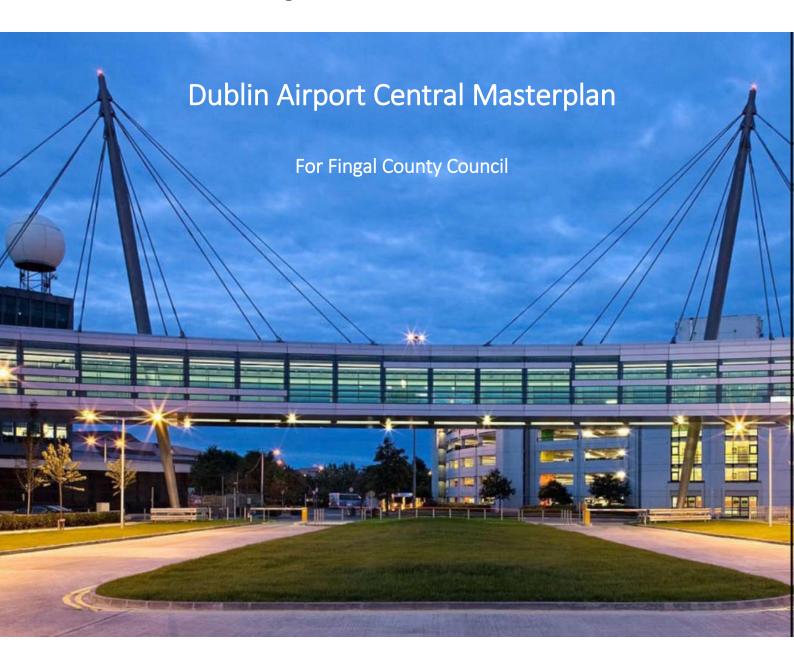
March 2016



SEA Statement

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The Strategic Environmental Assessment of



Prepared by:



April 2016

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1.0 Introduction and Background

1.1 Introduction and Background

Fingal County Council, in consultation with the daa (formerly Dublin Airport Authority) and their consultancy team, has prepared the Dublin Airport Central Masterplan. The Masterplan is a framework for the future development of lands strategically located adjacent to Dublin Airport. The Masterplan lands comprise an area of land identified as Zone 1. The Masterplan specifically focuses on the development of Zone 1 for high quality, high value office accommodation supplemented with ancillary uses. Longer term plans for other zones are not the subject of this Masterplan and will be subject to SEA Screening in the future.

In the Fingal Development Plan 2011-2017, the Masterplan lands are zoned as 'HT' High Technology and are subject to the map based Local Objective 378. The Zoning Objective for the HT zoning is to:

Provide for office, research and development and high technology/ high technology manufacturing type employment in a high quality built and landscaped environment.

The map based Local Objective 378 specifically applies to these lands and seeks to:

Consider within the context of the Masterplan, the nature and scale of appropriate HT uses and enterprise centre related to aviation and airport business, research and development associated with airports or aviation and Air Transport Infrastructure, having regard to the site's strategic location within the Dublin Airport Authority Lands.

While the Masterplan has been prepared in accordance with the Fingal Development Plan 2011-2017, it is likely that the Masterplan will be implementable under subsequent Fingal Development Plans. At the time of preparing this Environmental Report, the Draft Fingal Development Plan 2017-2023 has been prepared. In the Draft Development Plan, the Masterplan lands remain zoned as 'HT' High Technology and are subject to the map based Local Objective 57. Local Objective 57 maintains the intent of Local Objective 378 and seeks to:

Consider within the context of the Masterplan, that nature and scale of appropriate HT uses having regard to the sites strategic and unique location in proximity to an international airport within the Dublin Airport Authority lands

In this regard, the principles of the Masterplan, in particular relating to use classes, remain consistent with the zoning and objectives of the Draft Fingal Development Plan 2017-2023.

The Masterplan will serve as a coherent framework for the future development of these strategically located lands. The layout of the Masterplan is organised into seven chapters: the initial chapters present the context for the subject lands in relation to the planning policy; existing land uses and environmental conditions; and unique economic factors pertaining to the lands. The subsequent chapters outline the vision and principles which guide the future development framework; present the detailed development strategy for the Masterplan lands with a focus on Zone 1; and a description of the phasing and implementation of the development framework for Zone 1.

The Masterplan framework is formulated and structured on four key guiding principles. These include principles relating to urban design and quality space making; movement and circulation; economic conditions; and environmental and building sustainability.

1.2 Purpose of the SEA Statement

This document is the Strategic Environmental Assessment (SEA) Statement for the Dublin Airport Central Masterplan.

The main purpose of the SEA Statement is to provide information on the decision-making process and to document how environmental considerations, the views of statutory consultees and other submissions received during the consultation phases have been taken into account in the approved Masterplan, together with the arrangements put in place for monitoring, thereby bringing more transparency to the decision-making process.

The SEA process thereby assists in and improves the quality of the plan making process by:

- Facilitating the identification and appraisal of alternative Masterplan strategies;
- Raising awareness of the environmental impacts of the Masterplan's implementation; and
- Encouraging the inclusion of measurable targets and indicators to aid monitoring.

1.3 Legislative Context

The EU Directive on Strategic Environmental Assessment or SEA (Directive 2001/42/EC) came into force in July 2001. The SEA Directive was subsequently transposed into Irish law through S.I. No. 435 of 2004 (European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 and S.I. No. 436 of 2004 (Planning and Development (Strategic Environmental Assessment) Regulations 2004 as amended by S.I. No. 200 of 2011 (European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011) and S.I. No. 201 of 2011 (Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011) respectively.

Under this legislation member States of the EU are obliged to assess the likely significant environmental effects of plans and programmes prior to their adoption thus providing for the assessment of strategic environmental considerations at an early stage of the decision making process.

Article 1 of the SEA Directive states:

"The objective of this directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment."

The Directive came into effect in an Irish context in July 2004. Since then SEA must be prepared for plans and programmes, including:

- Regional Planning Guidelines;
- City and County Development Plans;
- Development Plans made by Town Councils, where the population of the area is 10,000 or more;
 or
- Masterplans for towns with a population of 5,000 or more.

The Regulations state that SEA is mandatory for certain plans while screening for SEA is required for other plans that fall below the specified thresholds. Where plans or programmes fall below or outside of the specified thresholds, a screening report is required to be carried out to determine whether the making and implementation of a particular plan will or will not, lead to significant environmental consequences for the plan area.

Article 9 (1) (a) of Planning and Development (Strategic Environmental Assessment) Regulations 2004 (as amended in 2011) states:

- (1) Subject to sub-article (2), an environmental assessment shall be carried out for all plans and programmes which are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism and town and country planning or land use, and which set the framework for future development consent of projects listed in Annexes I and II to the Environmental Impact Assessment Directive¹, or
- 2) A plan or programme referred to in sub-article (1) which determines the use of a small area at <u>local level</u> or a minor modification to a plan or programme referred to in sub-article (1) shall require an environmental assessment only where the competent authority determines that it is likely to have significant effects on the environment and, for this purpose, the competent authority shall make any necessary determination.
- (3) A competent authority shall determine whether plans and programmes other than those referred to in sub-article (1), which set the framework for future development consent of projects, are likely to have significant effects on the environment.
- (4) A competent authority shall, <u>in determining on a case by-case basis</u> under sub-article (2) or (3) whether a plan or programme, or modification to a plan or programme, which would or would not be likely to have significant effects on the environment, <u>take account of relevant criteria set out in</u> Schedule 1 and any submission or observation received in response to a notice under sub-article (5).

Following careful review and consideration of the issues concerning the proposed Masterplan, acknowledging its non-statutory status, it was concluded that given its role as the coherent framework for future development of Dublin Airport Central lands, the potential for adverse environmental effects could not be ruled out and as such full Strategic Environmental Assessment should be carried out.

1.4 SEA Process

The Dublin Airport Central Masterplan has undergone Strategic Environmental Assessment, in accordance with the legislation as outlined above. An Environmental Report prepared to accompany the Masterplan is submitted for consideration together with the Masterplan. The Environmental Report provides an understanding of the consequences for the environment of carrying out the Masterplan as proposed.

Submissions on the Masterplan and Environmental Report were evaluated at each stage in the process of making the Masterplan. This enabled the proper assessment of the effect on the environment of proposed changes and amendments. The Elected Members of Fingal County Council took the Environmental Report into account in their consideration of the Masterplan.

The legislation and guidelines governing the SEA process state that the processes of preparing the Masterplan, SEA and Appropriate Assessment (AA) should be integrated and prepared in an iterative manner. The Environmental Report (ER) outlines the how the SEA process was carried out in tandem with the preparation of the Masterplan and its accompanying AA Screening. The SEA process, which included Strategic Review meetings and SEA/AA/Masterplan workshops, ensured that the Masterplan was informed by environmental considerations from the outset. The SEA Team were fully involved in the analysis of development options and were in a position to make suggestions throughout the process of the

¹ It is noted that Annex II of the EIA Directive references 10. Infrastructure projects (a) Industrial estate development projects; (b) Urban development projects, including the construction of shopping centres and car parks;

Masterplan preparation to ensure that environmental considerations and environmental effects were considered in the formulation of strategic goals and development objectives.

Section 13(I) (1) of S.I. 436 of 2004 sets out the requirements of the SEA Statement as follows:

- how environmental considerations have been integrated into the plan,
- how the following has been taken into account during the preparation of the plan:
 - o the environmental report;
 - o submissions and observations made on the Draft Plan and Environmental Report; and
 - o consultations with other Member States (if any).
- the reasons for choosing the plan, as adopted, in the light of the other reasonable alternatives dealt with, and
- the measures decided upon to monitor the significant environmental effects of implementation of the plan.

The SEA has also been informed by guidance issued by statutory authorities, namely

- Development of Strategic Environmental Assessment (SEA) Methodologies for Plans and Programmes in Ireland Synthesis Report (Environmental Protection Agency, 2003),
- Implementation of SEA Directive 92001/42/EC): Assessment of the Effects of Certain Plans and Programmes on the Environment Guidelines for Local Authorities and Planning Authorities (Department of the Environment, Heritage and Local Government, 2004), and
- SEA Pack (2013) (Environmental Protection Agency, 2013)

Figure 1 (below) provides a summary of the integrated nature of the LAP preparation and SEA process.

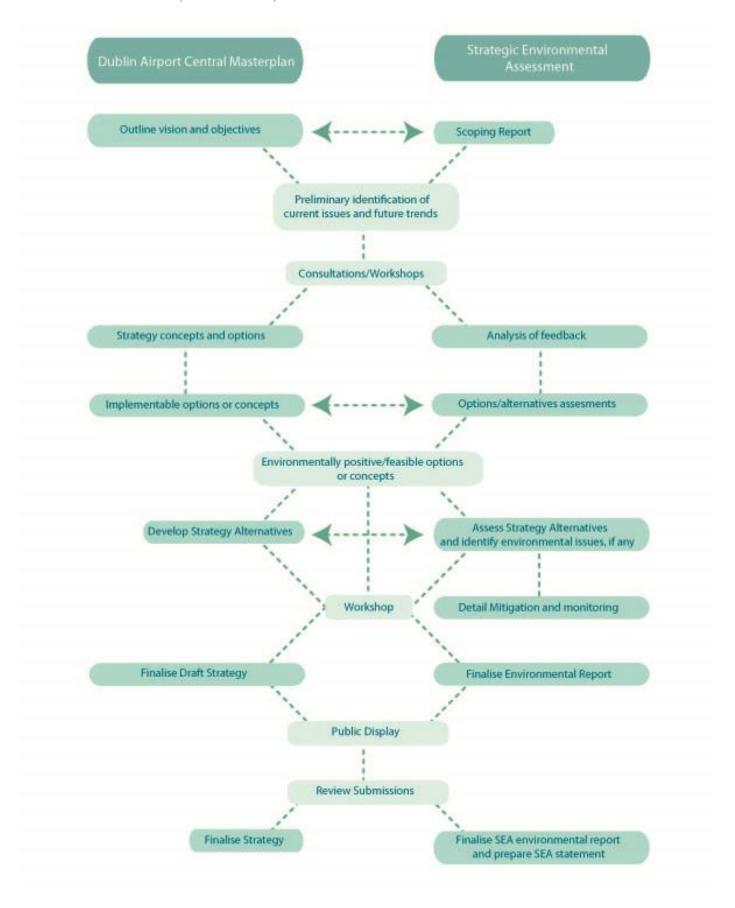


Figure 1: Integrated Masterplan and SEA Process

2.0 Integration of Environmental Considerations into the Plan

2.1 Purpose of SEA Statement

Environmental considerations were integrated into the Masterplan making process at all stages.

This initially comprised reviewing the baseline situation and mapping of environmental constraints and sensitivities so as to identify any new considerations or information available from the baseline situation.

As the Masterplan developed, environmental considerations were directly considered at a number of stages in the SEA process as set out in Table 2.1.

Stage	Description	
Screening	The screening process is the first stage of the Strategic Environmental Assessment. Screening assesses the need to undertake a Strategic Environmental Assessment. As Strategic Environmental Assessment is not mandatory for the Dublin Airport Central Masterplan, screening was undertaken, and concluded that SEA should be carried out.	
Scoping	The Scoping of the Dublin Airport Central Masterplan was carried out in accordance with Article 5 (4) of the SEA Directive (2001/42/EC).	
	The principal purpose of the Scoping stage is to decide upon the range of issues and level of detail to be included in the Environmental Report. An overview of the relevant environmental issues requiring further analysis are given and consideration in the Environmental Report and ultimately in the Masterplan itself. By highlighting some of the significant issues at an early stage, it ensures that the issues are firmly to the forefront when considering each of the policies and objectives of the Plan and reduces the possibility of relevant issues not being addressed.	
Consultation with the	Submissions were received:	
Environmental Authorities	Environmental Protection Agency	
radionales	Dublin City Council	
	Meath County Council	
Scoping Report	Submissions received from Environmental Authorities were reviewed and incorporated into the process where warranted.	
Preparation of ER & Masterplan	A multi-disciplinary team was established to create policy consistent documents and to examine the effects on the environment of implementing the objectives and policies.	
	Objectives created in Masterplan assessed in ER and Development options examined.	
	Feedback from on-going Plan preparation process & ER	

	preparation.
	Mitigation measures discussed and chosen.
	Monitoring incorporated into existing methods.
Monitoring the Masterplan	Monitoring significant environmental effects over the lifetime of the Dublin Airport Central Masterplan.

Table 1 Key Stages of SEA

2.2 Screening

Screening assesses the need to undertake a Strategic Environmental Assessment. As Strategic Environmental Assessment is not mandatory for the Dublin Airport Central Masterplan, screening was undertaken, and concluded that SEA should be carried out.

2.3 Scoping

The Scoping of the Draft Dublin Airport Central Masterplan was carried out in accordance with Article 5 (4) of the SEA Directive (2001/42/EC).

The principal purpose of the Scoping stage is to decide upon the range of issues and level of detail to be included in the Environmental Report. An overview of the relevant environmental issues requiring further analysis are given and consideration in the Environmental Report and ultimately in the Masterplan itself. By highlighting some of the significant issues at an early stage, it ensures that the issues are firmly to the forefront when considering each of the policies and objectives of the Plan and reduces the possibility of relevant issues not being addressed.

The scoping aspect involved consultation with the statutory consultees, providing an opportunity to comment on the highlighted issues and the proposed methodology. Under the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011 the list of statutory consultees includes:

- The Environmental Protection Agency.
- The Minister for Environment, Community and Local Government.
- The Minister for Arts, Heritage and Gaeltacht Affairs.
- The Minister for Agriculture, Food and the Marine.
- The Minister for Communications, Energy and Natural Resources.
- Any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, in this case counties includes Dublin City, Meath, Kildare.

In compliance with the SEA (Amendment) Regulations, Fingal County Council gave notice to the relevant Environmental Authorities of its intention to prepare a Masterplan for the area. A Scoping Report was prepared in order to facilitate consultation with statutory consultees and consultees were requested to review the content of the report and to comment on aspects they believe may require particular emphasis in the Masterplan and associated SEA Environmental Report and Appropriate Assessment documentation.

2.4 Statutory Consultation

Submissions were received from the following statutory consultees, in response to the Scoping Report:

- Environmental Protection Agency
- Dublin City Council
- Meath County Council

Table 2 below outlines the issues raised and the response or how the issue was addressed within the preparation of the draft Environmental Report:

Consultee and Comments	Response
Environmental Protection Agency	
Acknowledges Scoping for Masterplan and draws attention to EPA Checklist, Guidance on SEA and SEA Scoping Pack as well as updated SEA Regulations / Circulars. The Agency also lists the Environmental Authorities to be notified.	Noted.
• The protection, and where possible, the enhancement of surface and	
groundwater quality.	Noted.
• The integration of the recommendations of the Eastern CFRAM Study	Noted.
upon adoption.	Noted.
The incorporation of Flood Risk Assessment and SUDS	Noted.
The protection, and where possible the enhancement, of designated	Noted.
(and non-designated) habitats and species and ecological corridors/linkages.	Noted.
• The inclusion of appropriate and relevant habitat mapping for the Plan area where possible.	Noted.
• The promotion and incorporation of energy and water conservation measures	Noted.
• The integration of the County Green Infrastructure Strategy as appropriate in the Plan area. Appropriate zoning in line with Core Strategy and Regional Planning Guidelines.	Noted.
• The potential for cumulative effects with other plans/programmes. The provision of adequate and appropriate critical infrastructure. Integration of the requirements of other higher level plans including those in areas such as Water (Eastern CFRAMS), Land Use (Regional Planning Guidelines and Core Strategy), Transport (Greater Dublin Area Transport Plan and National Transport Authority Draft Greater Dublin Area Cycle Network Plan and associated SEA), Waste	

Management (proposed new Regional Waste Management Plansthese may be in place prior to adoption of the Plan).	
, , , , , , , , , , , , , , , , , , , ,	
Meath County Council	
Meath County Council support the principle of future development at Dublin Airport given its strategic importance to the Country as a national and international transport hub and to the local economies of Fingal.	
 Any planned modifications to the existing Dublin Airport Safety zones Map (outlining public safety and noise zones) should be made known to Meath County Council. 	Noted.
 Requests that this submission is fully considered in the review of the Masterplan and that a copy of the Strategic Environmental Report and Draft Dublin Airport Masterplan be forwarded for their attention when prepared. 	
Dublin City Council	
Welcomes the SEA carried out by Fingal County Council	
• Requests that the area, south-east of the Masterplan known as Clongriffin-Belmayne area be assessed in relation to potential direct/indirect impact in the context of water and Noise/Air.	
Wider city issues in relation to the role of Irish Water and Dublin City Council in ensuring adequate water supply and wastewater capacity for the Dublin Region	Noted.
Consideration of potential flooding impacts on the Mayne River	

Table 2: Summary of Scoping Comments

2.5 Draft Masterplan Consultation

The Draft Masterplan was published and placed on display for 4 weeks, from Tuesday 2nd February to Monday 29th February 2016, during which time submissions and observations were invited from the public and the interested parties. A report summarising the issues raised and the Manager's recommendation was presented to the Elected Members following this and agreed the approval of the Masterplan at the council meeting on 14th March 2016.

The Strategic Environmental Assessment Environmental Report and Appropriate Assessment Screening accompanied the Draft Masterplan during the public display period. Submissions with regards to the SEA were received as follows:

No.1: CG Hotels Limited

Issue Raised in Submission	Response
Clarification sought relating to extent of Masterplan.	Not relevant to SEA
	Environmental Report

No.2: EPA Submission

Issue Raised in Submission	Response
Plan should consider a reference to the National	Noted. A reference will be made
Mitigation Plan, which is currently being prepared by the	in the final Environmental Report.
DECLG in collaboration with other Government	
Departments including DITAS, DAFM and DCENR.	
Alternatives: The submission notes the two alternatives	Noted. It is considered reasonable
scenarios considered and suggests considering	to assess density approaches and
additional reasonable alternatives relating to assessing	this will be included in the final
possible high, medium and low density development	Environmental Report.
scenarios within the Plan area may be useful. This	
approach could be used to support the higher tiered	
alternatives as already provided for in the Plan.	
Monitoring: The submission suggests it would be useful	Noted. The final Environmental
where possible, to include the frequency over which	Report will include suggested
monitoring is proposed to be carried out for the relevant	frequency of monitoring. In
environmental criteria. The Plan should also include a	addition stronger references to
commitment that the Draft Fingal County Development	the Draft Development Plan will
Plan 2017-2023 and associated SEA related monitoring	be included.
should be integrated as appropriate.	
Where amendments to the Draft Masterplan are	Noted
proposed, these are screened appropriately	
The EPA submission notes the requirements for SEA	Noted
following adoption of the Plan and that a copy of the	
SEA Statement with the above information should be	
sent to any environmental authority consulted during	
the SEA process.	

No.3: Dublin City Council

Issue Raised in Submission	Response
Dublin City Council acknowledges that the matters	Noted.
raised in their submission have been noted and	
considered in the SEA and AA process.	

No.4: daa

Issue Raised in Submission	Response
The daa submission states that Page vi makes an unsupported reference relating to the over reliance on car based transport and requests that the statement be removed. The submission states that just 33% of passengers travelling to the airport in 2014 were by private car.	Proposed alteration of text to following: The lack of a high-quality public transport system to and from the Airport, and consequential impacts on the surrounding national road network is considered a critical issue.
The submission requests that the statement on Page 66 which highlights that the 'existing wastewater infrastructure is at capacity should be clarified to acknowledge that it refers to a single length of foul sewer, and not to the system as a whole.	Noted. This will be amended in the Final Environmental Report.
Page 70 includes a typographical error in that it refers to the area containing 'a rich coastal landscape'. This should be clarified to confirm that this is within the Fingal region, but not the site which is the subject of the SEA.	Error noted. Will be amended in final Environmental Report

No.5: Department of Arts, Heritage and the Gaeltacht

Issue Raised in Submission	Response
This Department notes that the Draft	The masterplan lands, as existing built lands, are
Master Plan and SEA do not take into	entirely artificial in character, comprising
account fauna, including bats, buzzards	existing roads, car parks, buildings and
and hares, on the site and in the vicinity,	landscape planting. There are a number of
all of which are protected under the	treelines, hedgerows and some small areas of
Wildlife Acts 1976- 2012.	amenity grassland. The SEA considered the
	impact on the wider area which includes the
	runways where wildlife species can be found but
	no impact was considered likely. Specific
	reference to the wildlife outlined in the DAHG
	submission will be included in the Final
	Environmental Report.

2.6 Environmental Report

The type of information to be provided in the Environmental Report is set out in Annex I of the SEA Directive - reproduced in Schedule 2B of the Planning and Development Regulations 2001 (as inserted by article 12 of the Planning and Development (Strategic Environmental Assessment) Regulations 2004).

The Environmental Report is prepared alongside the Masterplan process and investigates, describes and evaluates the effects on the receiving environment of implementing the Masterplan. The report also assesses and identifies development alternatives and identifies the environmentally preferred development strategy.

The preparation of the Environmental Report influenced the formulation of the Masterplan in a number of distinct ways:

- It encouraged the wide use of background environmental data and formally connects this data to the making of the plan
- It determined the Strategic Environmental Objectives (SEOs) against which the policies and objectives of the plan were assessed.
- The Strategic Environmental Objectives (SEOs) will form the basis for the future on-going monitoring of the Masterplan.
- The Environmental Report determined the identified development strategy option provides the most sustainable and appropriate environmental approach to the future development of the area, when assessed against the Strategic Environmental Objectives.
- It provides greater transparency to the public as to how environmental issues are incorporated and assessed in the plan-making process.

Key issues were identified in the Environmental Report across each of the environmental areas. These were largely based on the environmental baseline and the issues raised during the Scoping stage, as set out in Table 2 above. The full review of key issues is set out in Chapter 4 of the Environmental Report.

The Strategic Environmental Objectives (SEOs) are measures against which the environmental effects of the Masterplan are tested in order to identify where significant adverse impacts are likely to occur.

SEA of the Draft Masterplan

The Draft Masterplan was considered for its possible impacts on the environment. The initial stage aims to ascertain the quality, if any, of the potential impact. Each of the Masterplan's policies and objectives were screened for their impact and where a neutral impact is noted no further discussion is provided within this report. This format allows for the Environmental Report to focus on the negative and positive impact. Thus it is a more robust, more focused approach to understanding the potential impact associated with the Masterplan's implementation. Where it was determined that a policies/objective may potentially result in a negative impact on an environmental receptor appropriate level mitigation measures were identified or proposed.

The assessment informing the Draft Plan was arrived at following both the submissions received during Scoping Consultation in addition to the assessment of the draft Plan Policies and Objectives against the established SEO's.

SEA Screening of Alterations to Draft Masterplan

Following the display of the Draft Dublin Airport Central Masterplan and the public consultation period, the Chief Executive prepared and distributed to the elected members of Fingal County Council, a report on the submissions and observations received, including an opinion on issues raised within submissions and any recommended amendments to the draft plan. The Chief Executive's recommended amendments were screened in terms of SEA and AA to identify any likely significant effects on the environment at this stage in the process. This was documented within the Chief Executive's Report.

2.7 Consideration of Alternatives

The SEA Directive requires the consideration of SEA Alternatives. This consideration is outlined in Chapter 7 of the Environmental Report.

The consideration of alternatives is restricted by the extent of land identified for development. On this basis, three alternative approaches were considered for the future development of this area and assessed against the SEOs established in the SEA.

This assessment was undertaken to identify any potential issues in relation to these alternatives that may not have been identified as part of the initial alternatives assessment ranking procedure. The alternatives reviewed represent choices that are available to the planning authority in delivering the same balance of growth across the Masterplan area.

2.8 Mitigation

Section (g) of Schedule 2B of the SEA Regulations require information on the mitigation measures that will be put in place to minimise/eliminate any significant adverse impacts due to the implementation of the Masterplan. Chapter 9 of the Environmental Report highlights the mitigation measures that will be put in place to counter identified significant adverse impacts due to the implementation of the Masterplan. As stated previously the formulation of the Plan and the development of the SEA is an iterative process and therefore many of the potential negative aspects of the Masterplan have been removed.

Thus the objectives and policies contained within the Masterplan are considered robust and environmentally sustainable. However some unavoidable residual issues may remain and therefore mitigation measures are required. Chapter 9 details the mitigation measures necessary to prevent, reduce and, as fully as possible, offset any significant adverse impacts on the environment of implementing the Masterplan.

2.9 Monitoring

Article 10 of the SEA Directive sets out the requirement that monitoring is to be carried out of the significant environmental effects of the implementation of the Dublin Airport Central Masterplan in order to identify at an early stage any unforeseen adverse effects and to be able to undertake appropriate remedial action.

Chapter 10 outlines the monitoring requirements for the Dublin Airport Central Masterplan. Methods of monitoring and indicators of change in the environment have been proposed with set targets to be reviewed over the duration of the Masterplan.

The Fingal Development Plan is currently under review and the Draft Fingal Development Plan 2017-2023 including Environmental Report is on public display. It is considered appropriate that the monitoring programme for the Dublin Airport Central Masterplan is integrated with the monitoring programme for the adopted Fingal County Development Plan 2017-2023.

3.0 Consideration of Alternatives

3.1 Introduction

The issue of alternatives is a critical function of the SEA process and is necessary to evaluate the likely environmental consequences of a range of alternative development strategies for the Masterplan area within the constraints imposed by surrounding conditions. The alternatives were considered throughout the process and through an iterative process with the Masterplan, SEA and AA teams the most appropriate scenario was selected.

3.2 Legislative context

Article 5 of the SEA Directive requires the consideration of reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme and the significant environmental effects of the alternatives proposed. It states under Article 5(1) that;

Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.

In accordance with SEA guidelines the alternatives put forward should be reasonable, realistic and capable of implementation. They should also be in line with the appropriate strategic level at which the Plan will be implemented within the national and county planning hierarchy. The Dublin Airport Central Masterplan will be framed within a policy context set by a hierarchy of National, Regional and County level strategic plans as well as the Irish and European legislative framework. Therefore the options for alternatives are limited, and a scenario such as the 'do-nothing' situation has not been included as it is neither appropriate, reasonable nor realistic.

The alternatives proposed have been assessed against the relevant Strategic Environmental Objectives (SEOs) established for the key aspects of the environment likely to be affected by the Plan's implementation. The evaluation process resulted in the identification of potential impacts and informed the selection of the preferred development scenario for the Dublin Airport Central Masterplan. This determination sought to understand whether each alternative was likely to improve, conflict with, or have a neutral interaction with the environment of the plan area.

3.3 Methodology for the Selection of Alternatives

The Masterplan is based on the principles of sustainable development which means that development will be promoted in accordance with the appropriate international, national, regional and county guidelines.

The consideration of alternatives is restricted by the extent of land identified for development. On this basis, it was considered the most realistic alternatives were based upon density and by the existing airport related constraints imposed by the operating airport surrounding the Masterplan lands and THESE WERE assessed against the SEOs established in the SEA.

The three alternatives assessed were:

- a) Low Density Development
- b) Medium Density Development
- c) High Density Development

Alternative 1: Low Density Development

This approach to the future development of the Dublin Airport Central lands would result in a low density of development akin to the existing airport campus. The overall building heights vary between 2 and 6 levels with strategically positioned signature buildings of 8 levels that form an exception to this rule. This alternative allows for the maximum amount of sunlight penetration on the site. The proposed office clusters are spread out and surrounded by landscaping areas and surface level car-parking. Given the economic potential and significance of the site it was considered that a low density scenario failed to reuse these valuable brownfield lands efficiently and did not optimise infrastructure investment.

Alternative 2: Medium Density Development

The overall building heights vary between 4 and 10 levels with strategically positioned signature buildings of 12 levels that form an exception to this rule. The composition of the variation of height guarantees a pleasant human scale in the public space and a balanced distribution of density over the site. It also allows view lines and an appropriate level of sunlight to penetrate the site. The proposed office clusters are supported by an approach to the public realm that is focused on developing public open spaces that are of a high quality, distinctive and legible. The framework includes three different categories of public open space: the Transition Square, the Green Lung, and the plazas within the development clusters. It was considered that the medium density, supported by infrastructure investment in a phased manner, provided the most

Alternative 3: High Density Development

The overall building heights vary between 8 and 12 levels with strategically positioned signature buildings of 16 levels that form an exception to this rule. Instead of providing for variations in height the established shoulder height would be at the upper level, reducing daylight penetration and providing for an intensified reliance on infrastructure. The approach towards public realm is that of hardscaping and no significant open spaces. In addition high-level of car-parking would be required to meet the demands of employees and airport visitors. The high density scenario would put overbearing pressure on infrastructure investment, was visually intrusive and had significant transportation impacts.

3.4 Consideration against the SEOs of the Masterplan

This assessment is undertaken to identify any potential issues in relation to the alternative development scenarios proposed and to identify which is most suitable. This essentially is a thorough review of the approaches from and environmental perspective. This assessment was used to inform the overall approach towards the future development of Dublin Airport Central lands as would be pursued and facilitated by the Masterplan policies and objectives.

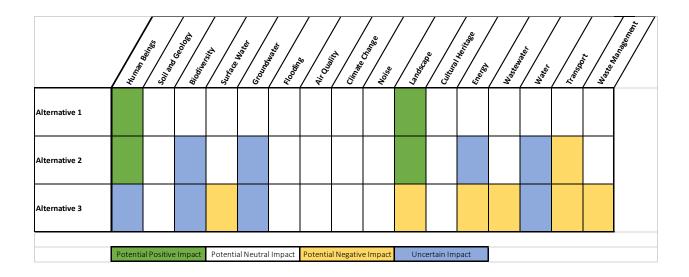


Table 12: Assessment of Alternatives against SEOs

The potential uncertainties or negative impacts identified in the assessment relate to localised impacts which may occur as a result of development of these alternatives. However these potential uncertainties can be dealt with at planning application stage and are mitigated against by protective policies contained in the draft Plan with regards to transport, biodiversity and landscape etc.

3.5 Conclusions

The alternatives reviewed represent choices that are available to the planning authority in facilitating the balance of growth and environmental protection.

The density and location of future economic development requires a balance between the desires to increase the number of people employed in the Masterplan area through consolidating development clusters, maintaining the operation of the Airport and its supporting infrastructure and the need to protect the natural environment. The selection of Alternative 2 represents an appropriate balance between the competing environmental objectives.

4.0 Masterplan Plan Monitoring

4.1 Introduction

Under the Planning and Development Act, 2000 - 2015, the Local Authority is required to prepare a progress report on the implementation of the Masterplan. Given the environment is a significant consideration, then the progress report will include the key findings of the environmental monitoring programme as outlined in this chapter of the Environmental Report.

Monitoring of the Dublin Airport Central Masterplan and its implications on the environment is paramount to ensure that the environment is not adversely affected through the implementation of the Plan. Under Article 10 of the SEA Directive monitoring must be carried out of the significant environmental effects directly related to the implementation of the Masterplan "in order to, inter alia, identify at an early stage unforeseen adverse effects and to be able to undertake appropriate remedial action." The Department of the Environment, Community and Local Government Guidelines on SEA recommends that monitoring does not require new research activity; existing sources of information can be used and the task of data collection can be shared. In this regards, as suggested by the EPA, It is considered appropriate that the monitoring programme for the Dublin Airport Central Masterplan is integrated with the monitoring programme for the Fingal County Development Plan 2017-2023, once adopted.

While considerable environmental data is directly available to the Council such as water quality, recycling rates *etc.*, other sources of information will be accessed to provide a comprehensive view of the impact of the Masterplan. In this regard the Local Authority will work with other agencies with environmental mandates to gather data for the purposes of monitoring the implementation of the Masterplan, with particular reference to the daa. Additionally, while monitoring specific elements of the environment is not strictly the preserve of the Council, the Council will continue to liaise and work with the Environmental Protection Agency, The National Parks and Wildlife Service, Inland Fisheries, as well as others in the pursuit of environmental conservation and protection through existing environmental monitoring procedures.

4.2 Monitoring Indicators

It is proposed to base monitoring on a series of indicators which measure changes in the environment, especially changes which are critical in terms of environmental quality, for example water or air pollution levels. The indicators aim to simplify complex interrelationships and provide information about environmental issues which is easy to understand. A list of environmental indicators is provided in Chapter 10 of the Environmental Report. The indicators are based on the Strategic Environmental Objectives presented in Chapter 6 and have been derived from knowledge of the existing environmental issues within the Plan area and also from legislation, guidelines and higher level Plans.

Environmental indicator assessment during monitoring can show positive/neutral impacts or negative impacts on the environment. Where an indicator value highlights a positive/neutral impact on the environment, it is likely that the policies and objectives of the Plan are well defined with regard to the environment. Conversely where the objectives of the Plan have a negative impact on the environment, it may be necessary to review the objectives of the Plan or to take some other form of intervention. For example, if an objective or policy is having a significant adverse impact, an alteration may be considered to the Masterplan.

5.0 Conclusion

The Dublin Airport Central Masterplan its policies and supporting objectives are key to the future sustainable development of the Dublin Airport Central lands as a critical economic hub. The Masterplan aims to balance the needs of the future working population with the preservation and conservation of the environment as prescribed in the Fingal County Development Plan. The Masterplan has a strong focus towards sustainability.

The Strategic Environmental Assessment process has been carried out in conjunction with the preparation of the Masterplan itself. This allows for an early indication of the potential environmental effects likely to occur as a result of the implementation of the Masterplan. As a result changes or alterations to the Masterplan are made throughout the course of its preparation. Through this process of assessment and re-assessment, it was identified that particular objectives or policies could potentially have a negative environmental impact on particular environmental receptors or indeed on a number of them simultaneously.

In summary, the assessment of the Masterplan has concluded that its policies and objectives are acceptable and represent a balanced and fair approach to the sustainable development of Dublin Airport Central lands. Monitoring of the Masterplan throughout its lifetime will ensure that any potential adverse environmental impacts, unforeseen at this stage will be identified early, so as to prevent any deterioration of the environment. This Masterplan, as currently presented, balances growth with environmental protection and can deliver a sustainable economic development of the area.