

**SEA SCREENING Decision – 3<sup>rd</sup> April 2012**

**PLANNING AND DEVELOPMENT ACTS 2000-2010  
PLANNING AND DEVELOPMENT (STRATEGIC ENVIRONMENTAL ASSESSMENT)  
REGULATIONS 2004 - 2011**

**SOUTH DUBLIN COUNTY COUNCIL DEVELOPMENT PLAN 2010-2016  
PROPOSED VARIATION NO. 2**

Report Pursuant to Article 13 K (1) of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004) as amended by the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011, (S.I. No. 201 of 2011)

DETERMINATION OF THE NEED FOR ENVIRONMENTAL ASSESSMENT OF A VARIATION OF THE SOUTH DUBLIN COUNTY DEVELOPMENT PLAN IN TERMS OF THE PROVISIONS OF THE PLANNING AND DEVELOPMENT (STRATEGIC ENVIRONMENTAL ASSESSMENT) REGULATIONS 2004 - 2011

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## 1.0 INTRODUCTION

South Dublin County Council (the Planning Authority) intends to initiate the procedures for making a Variation of the County Development Plan 2004-2010 under Section 13 of the Planning and Development Act 2000 (as amended) (the Act).

At the County Council meeting on 13<sup>th</sup> February 2012, it was proposed and agreed to initiate the procedure for the making of a variation to the South Dublin County Development Plan 2010 – 2016 in the following manner: -

- Deletion of two policies (existing policies EE40 and EE41)
- Insertion of one new policy (new policy EE40)
- Re-numbering of relevant policies accordingly
- Introduction of a new section into Schedule 4
- Other relevant minor amendments to the text.

The text to be amended is contained in two sections in the Plan; the *'Enterprise and Employment'* section (within Theme 3, *'A Busy Place'*); and Schedule 4 *'Casement Aerodrome, Baldonnell'*. Full details of the proposed amendments are included in Appendix 1. The reason for the Variation is to insert a protocol into the Plan which would facilitate development of zoned land within the Casement Aerodrome security zone, without compromising the security of the aerodrome.

While there were a number of proposals (which were adopted in the last Development Plan process) to relax the development restrictions within the Security Zone and to negotiate this relaxation with the Department of Defence, it is only recently that agreement has been reached as to the detail of the relaxation and hence, the variation.

While South Dublin County Council is of the view that the variation would be likely to have significant effects on the environment, it is considered that the environmental assessment of a variety of motions related to the Security Zone relaxation within the South Dublin County Development Plan 2010 – 2016 Strategic Environmental Assessment process already fulfils the SEA requirements under National and European Commission legislation. The Council has principally undertaken the SEA screening for the purposes of transparency.

### 1.1 Background and Proposed Variation

Policy EE41 of the South Dublin County Development Plan 2010-2016 'Casement Aerodrome – Security Consultation Zone' states

*'It is the policy of the Council to seek to amend the Security Zone Restriction around Casement Aerodrome so that it becomes a Security Consultation Zone, within which standard security measures will be applied in line with international best practice at military and civilian aerodromes. Furthermore, the said issue shall be brought back to this Council within one year of adoption of this Development Plan to be considered by way of variation of the Development Plan when full technical and legal advice is available to the Members.'*

Since the adoption of the Development Plan in October 2010, the Planning Department has engaged in discussions with the Department of Defence in order to pursue the provisions of the above policy. Arising from this work, it is proposed to insert a protocol which would facilitate development of zoned land within the Casement Aerodrome security zone without compromising the security of the aerodrome into the Development Plan, and hence this variation.

Criteria to address security concerns, either as part of a development submission or as a condition of permission, include:

- The creation of a sterile zone between the existing Security Zone fence and the boundary of the development, subject to a minimum width of 2.5 metres.
- The provision of a 3 metre high clear visibility fence where the development shares a boundary with the Aerodrome.
- CCTV coverage of any new development along the aerodrome perimeter.
- Building restrictions including distance from perimeter, site layout, limitations on windows and secure roofs.

Proposed amendments to the Development Plan have been drafted on this basis and it is proposed that these would form a Variation to the Development Plan.

The text to be amended is contained in the Enterprise and Employment section of the Plan, and Schedule 4 'Casement Aerodrome, Baldonnell' and is reproduced in full in Appendix 1 below.

## 1.2 Description of Lands at Casement Aerodrome, Baldonnell

Casement Aerodrome Security Zone comprises most of the Aerodrome lands in addition to lands in private ownership lying outside the aerodrome perimeter. The Security Zone is not marked on the ground, but rather, is a line demarcated on maps, at a set distance from runways and taxiways within the aerodrome.



For purposes of description, it may be useful to consider lands within and surrounding Casement Aerodrome, Baldonnell, in three distinct categories:

- (1) the lands within the Aerodrome perimeter fence
- (2) the lands between the Aerodrome perimeter fence and the Security Zone boundary

(3) the lands immediately outside the Security Zone boundary.

The Security Zone covers an area of 377.5 hectares (932.8 acres). Most of the land is part of Casement Aerodrome and is in the ownership of the Department of Defence.

All of the land is flat in character.

### **1.2.1 The lands within the Aerodrome perimeter fence**

This land is enclosed by a perimeter fence and consists of the aerodrome buildings to the north and the two runways, extending east-west and northeast-southwest. The area surrounding the runways and taxiways comprises large expanses of open grassland.

The aerodrome buildings which straddle the Security zone, include three Protected Structures:- Development Plan Map Reference Number 188 '*Detached Multiple Bay single Storey Officers' Mess*'; Number 189 '*Detached Two Storey T-Plan Airbase Administration Block*'; and Number 190 '*Detached Concrete-Framed Basilica-Plan Roman Catholic Church*'. The land also includes the site of a Ringfort (Rath/Cashel) at Collegeland No. DU021-021.

### **1.2.2 The lands between the Aerodrome perimeter fence and the Security Zone boundary**

A swathe of privately-owned land which is also within the Security Zone surrounds the Aerodrome land on most sides.

Between the northern boundary of the Security Zone and the aerodrome perimeter fence are several fields, some in grass and some tilled. These are mainly enclosed by hedgerows.

The area between the southern and eastern boundaries of the Security Zone and the aerodrome perimeter is also mainly in fields, both grass and tilled and are open in character. This area contains a tributary of the Camac River whose banks include natural vegetation.

### **1.2.3 The lands immediately outside the Security Zone boundary**

Greenogue Industrial Estate lies immediately to the southwest of the Security Zone. It is characterised by large freestanding industrial warehouse-type units used mainly for storage and distribution.

Immediately to the south is tilled farmland while located to the east of the Security zone, are the industrial units of Baldonnell Business Park, the large expanse of parked vehicles of a vehicle distribution centre, and beyond that the N7 (Naas Road).

To the north of the Security zone is tilled farmland and fields in grass enclosed by hedgerows while the buildings of the Aerodrome straddle the Security Zone boundary. The open, manicured lands of Grange Castle golf club lie beyond the aerodrome buildings to the north.

The grassed area at the end of the east-west runway straddles the western boundary of the Security Zone.

## **2.0 STRATEGIC ENVIRONMENTAL ASSESSMENT REQUIREMENTS**

In terms of the provisions of Article 13K of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 - 2011 (the Regulations), where a planning authority proposes to make a variation of a development plan under Section 13(2) of the Act, it shall (before giving notice under Section 13(2) of the Act) consider whether or not the proposed

variation would be likely to have significant effects on the environment, taking into account criteria set out in Schedule 2A of the Regulations.

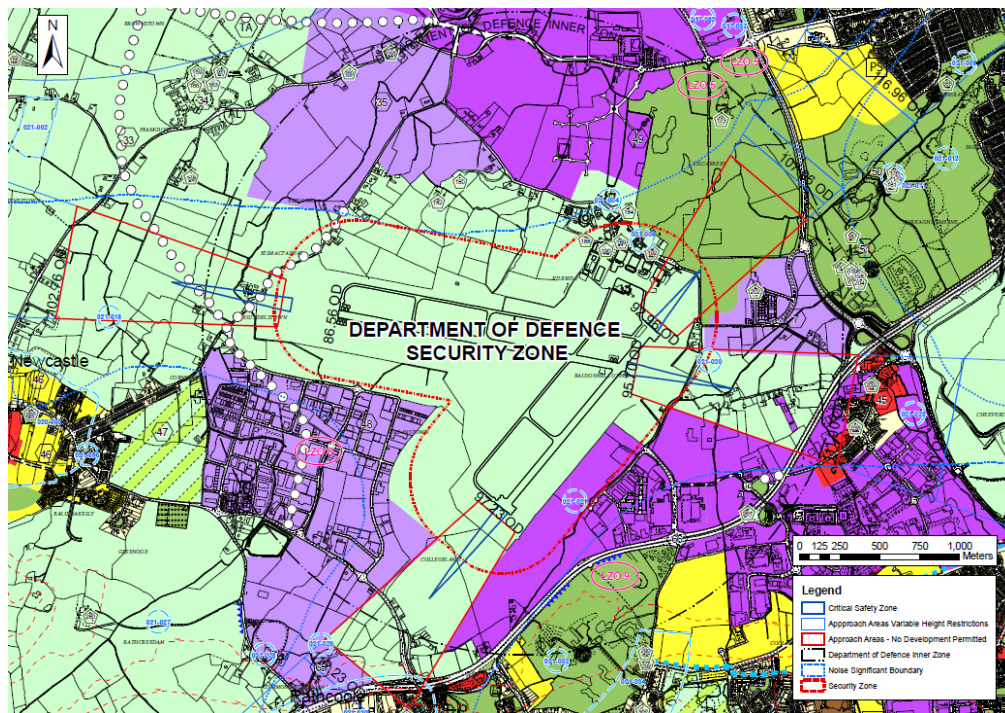
In terms of the Regulations, it is mandatory to undertake the screening process to determine whether or not to carry out a strategic environmental assessment as set out in Article 13K of the Regulations. An assessment of the proposed variation in terms of the criteria set out in Schedule 2A of the Regulations is set out in Section 3 below.

### 3.0 ASSESSMENT IN TERMS OF SCHEDULE 2A OF THE SEA REGULATIONS 2004 - 2011

#### 1. The characteristics of the plan having regard, in particular, to:

##### 1.1 The degree to which the plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.

This proposal is a statutory variation of the adopted Development Plan 2010 – 2016 for South Dublin County Council. The proposal would relax the current development restrictions within the Security Zone. In combination with the existing South Dublin County Development Plan 2010 – 2010, it sets a framework for projects and other activities, with regard to the location, nature, size and operating conditions. The stated intention of the proposal is to facilitate development of zoned land within the Casement Aerodrome security zone without compromising the security of the aerodrome.



The current proposal has arisen as a result of discussions between South Dublin County Council and the Department of Defence in relation to Policy EE41 ( adopted as part of the 2010 Plan process) of the South Dublin County Development Plan 2010-2016 'Casement Aerodrome – Security Consultation Zone' which states

*'It is the policy of the Council to seek to amend the Security Zone Restriction around Casement Aerodrome so that it becomes a Security Consultation Zone, within which standard security measures will be applied in line with international best practice at*

*military and civilian aerodromes”.*

There was also a rezoning proposal adopted on land within the Security Consultation Zone in the County Development Plan 2010 – 2016. Some of the land adjacent to the aerodrome previously zoned “To protect and improve Rural Amenity and to provide for the development of Agriculture”, was rezoned EP2 i.e.” To facilitate opportunities for manufacturing, Research and Development facilities, light industry, and employment and enterprise related uses in industrial areas and business parks”.

While there are two distinct aspects apparent here, i.e. the relaxation of the restrictions of the Security Zone and the rezoning of the land from agriculture to Employment and Enterprise, the potential impact of the current proposed variation is significantly increased by the combined outcome of the two on land that was previously all but sterilised apart from agricultural use.

### **1.2 The degree to which the plan influences other plans, including those in a hierarchy.**

This proposed Variation will influence future development on lands zoned for development in the Baldonnell area. While the majority of the land continues to be zoned “To protect and improve Rural Amenity and to provide for the development of Agriculture”, there is also the smaller rezoned EP2 i.e.” To facilitate opportunities for manufacturing, Research and Development facilities, light industry, and employment and enterprise related uses in industrial areas and business parks”.

### **1.3 The relevance of the plan for the integration of environmental considerations in particular with a view to promoting sustainable development.**

The Managers Report on the Motion states that the Proposed Variation seeks to achieve a “balance between the development of zoned land and the maintenance of appropriate security at Casement Aerodrome which will allow for the future proper planning and sustainable development of the area”. While the proposal could potentially result in a range of significant negative environmental impacts, many of the conflicts would be likely to be mitigated by measures which are included in the South Dublin County Development Plan 2010 - 2016. There are however likely to be significant residual negative impacts, see below.

### **1.4 Environmental problems relevant to the plan.**

The proposal to amend the current Department of Defence Security Zone Restriction around Casement Aerodrome, Baldonnell, so that it becomes a security Consultation Zone was assessed under the Strategic Environmental Assessment procedure as part of the South Dublin County Development Plan as follows;

*Restrictions currently in place around Baldonnell aerodrome have retained significant amounts of rural lands as green fields. Removal of these restrictions could have significant additional effects on river systems, such as the Camac (an already stressed and polluted river system) and biodiversity corridors. Significant impacts on the landscape would be envisaged if the motion were to be adopted. The levels of development proposed in these locations would result in the visual sprawl of the Metropolitan Area north and south along the N7 out to Rathcoole and Newcastle. The oft noted rural character of these villages and hinterlands would be visually eroded.*

The negative impact in relation to the Strategic Environmental Objectives, B3, W1, W3, C1, C2, HH1, L1 and S1 were outlined.

B3	Prevent loss of ecological networks
HH1	Protect human health - traffic/ incompatible landuses
S1	Re-use of brownfield lands
W1	Maintain and improve river, lake and surface water quality
W3	To prevent floodplain development
C1	Reduce greenhouse emissions from travel
C2	To reduce car dependency.
L1	To protect the landscape

### **1.5 The relevance of the plan for the implementation of European Union legislation on the environment (e.g. plans linked to waste-management or water protection).**

The proposed variation and the possible environmental impacts are of relevance to a range of EC Directives including the Water Framework, Floods, Habitats, and Strategic Environmental Assessment (SEA) Directive.

## **2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:**

### **2.1 The probability, duration, frequency and reversibility of the effects.**

The area specific policies and land use zonings in the Development Plan and the Proposed Variation will ensure that measures are put in place to encourage and promote the sustainable development of the area and include the provision of infrastructure, however there are likely to be significant residual negative impacts. The duration of these effects are likely to be long-term and irreversible.

### **2.2 The cumulative nature of the effects.**

It is considered that there is potential for significant cumulative effects on the environment in terms of impact on the landscape. Existing views from the N7 northwards across existing lands of rural character, see Section 2.7 below, are likely to disappear following the relaxation of the existing security restriction on land that was rezoned Employment and Enterprise during the adoption of the current Development Plan 2010 – 2016.

### **2.3 The transboundary nature of the effects.**

The Security Zone is fully within the jurisdiction of South Dublin County Council. It is considered that there will not be any significant transboundary effects with regard to this Variation.

#### **2.4 The risks to human health or the environment (e.g. due to accidents).**

It is not envisaged that there will be risks to human health or the environment due to accidents following the relaxation of the constraints on development. However it is likely that there will be increased traffic movements due to the development of lands not serviced by adequate public transport and consequent emissions of air pollutants that may impact on health generally as well as contributing to an increase in green house gasses.



**2.5 The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).**

The Security Zone covers an area of 377.5 hectares (932.8 acres). While the residential population would be low, there are approximately 1,250 military personnel and 100 civilians are based at the aerodrome and as such it is a major employer in the area.

**2.6 The value and vulnerability of the area likely to be affected due to:**

**(a) special natural characteristics or cultural heritage;**

**Biodiversity**

Restrictions currently in place around Baldonnell aerodrome have retained significant amounts of rural lands as green fields. Removal of these restrictions could have significant additional effects on biodiversity corridors

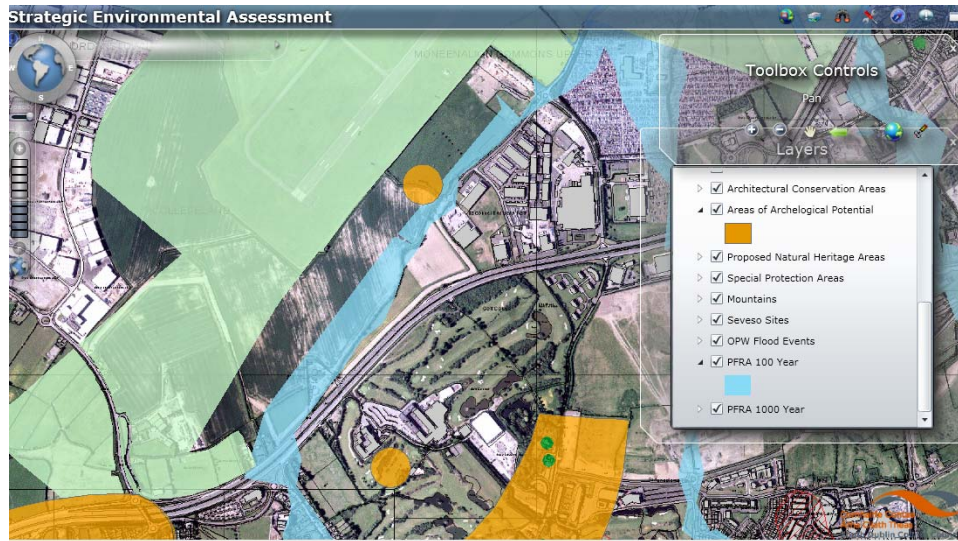


**Cultural Heritage** The aerodrome buildings which straddle the Security zone, include three Protected Structures:- Development Plan Map Reference Number 188 'Detached Multiple Bay single Storey Officers' Mess'; Number 189 'Detached Two Storey T-Plan Airbase Administration Block'; and Number 190 'Detached Concrete-Framed Basilica-Plan Roman Catholic Church'. The land also includes the site of a Ringfort (Rath/Cashel) at Collegeland No. DU021-021.

While the relaxation of the restriction on development policy the Security zone has the potential to have an impact on the above sites, there are existing policies within the Development Plan to mitigate these impacts.

## Flood Risk

A significant amount of land adjoining the Camac has been indicated as being at risk of Flooding..

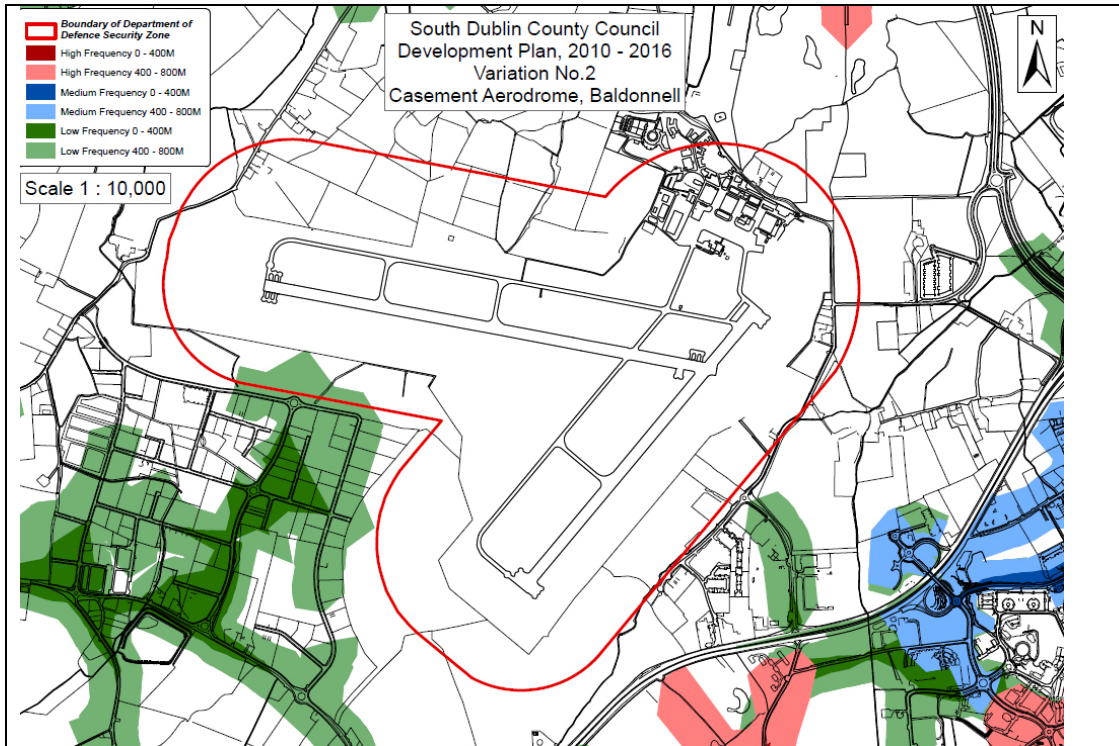


Flood risk information sources on the Variation Lands comprise information on alluvial soils as a surrogate for Flood Risk and Preliminary Flood Risk Assessment (PFRA) mapping from the OPW. The identification of a significant swath of land subject to Flood Risk just outside the Security Zone will require a detailed site-specific Flood Risk Assessment and appropriate responses at planning application stage in accordance with 'The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) and as required by existing policies within the South Dublin County Development Plan 2010 – 2016.

### (b) Intensive Land-use

#### Transport

The site, although located in close proximity to the N7, is not accessible by public transport and is not located along a public transport corridor.



The above map illustrates the practically non-existent Public Transport Accessibility within the Security Zone. Potential development when the Security Zone restrictions are lifted will likely increase the number of private car journeys with consequent increases in air emissions and a rise in greenhouse gases.

**(c) Exceeded environmental quality standards or limit values;**

**Water**

The Camac is monitored by the EPA and South Dublin County Council at three (3) stations. The most recent<sup>1</sup> water quality data indicates the quality of water in the south Dublin sections of Camac (Q3) as being poor status<sup>2</sup>. The sources for pollution to the Camac are Wastewater and Industrial Discharges (55%), Agriculture (20%), Wastewater from unsewered properties (10%), Forestry (10%) and Usage and Discharge of Dangerous Substances (5%).

The Eastern River Basin Management Plan also recommends a series of measures due to the classification of parts of the River Camac as being a Heavily Modified Water Body (some surface waters have been substantially changed in character to allow uses such as navigation, water storage, public supply, flood defence and land drainage. These waters are called "heavily modified". Due to their modified or artificial condition, these water bodies can require additional measures to improve their ecological potential).

The additional measures for the River Camac include

- Increase in-channel morphological diversity, e.g., install instream features, 2 stage channels.

<sup>1</sup> EPA (2006) Water Quality in Ireland 2005 Wexford: EPA

<sup>2</sup> The Biotic Index values, are assigned to rivers in accordance with biological monitoring of surface waters – low Q ratings, such as Q1, are indicative of low biodiversity and polluted waters, and high Q ratings, such as Q5, are indicative of high biodiversity and unpolluted waters, Good status as defined by the Water Framework Directive equates to approximately Q4 in the national scheme of biological classification of rivers as set out by the EPA.

- Protect and enhance ecological value of marginal aquatic habitat, banks and riparian zone
- Protect and restore historic aquatic habitats

It is noted within the Programmes of Measures contained within the River Basin Management Plan that the Camac will not reach 'Good' water status until 2027. This is due to the high amounts Waste-water & Industrial Discharges in addition to the very poor morphological status of the river. The status of the Camac Upper is described on [www.wfdireland.ie](http://www.wfdireland.ie) as follows

	<b>Camac Upper</b>
<b>Overall Status</b>	Poor
<b>Objective</b>	Restore 2027
<b>Risk</b>	At Risk
<b>Heavily Modified</b>	No
<b>Microinvertebrate Status</b>	Poor
<b>Physico- chemical</b>	Good

## **2.7 The effects on areas or landscapes which have a recognised national, European Union or international protection status.**

While there are no designated national or international landscapes in the vicinity, the undeveloped lands just to the south and south-east of Baldonnell Aerodrome are within the Newcastle Landscape Area are described in the South Dublin Landscape Character Assessment 2004 as follows "Rural area of arable farming and grazing, with well defined field boundaries. Little forestry exists. Flat grassland dominates the aerodrome area to the east". The issues of sensitivity within the Landscape Area are described as

- "Area around Newcastle Village and Baldonnell is subject to considerable development pressure
- Intact field patterns with hedgerow boundaries are under threat
- Grand Canal and banks to be conserved
- Open, expansive and rural character of the area
- Military aerodrome to the east, at Baldonnell has maintained open character of area.
- Mixed planting at Castlewarden Golf course
- Rich architectural heritage
- The Griffeen River (and the Camac River) forms a potential green link"

Significant impacts on the landscape, including cumulative impacts, would be envisaged if the Variation were to be adopted. The levels of development proposed in these locations would result in the visual sprawl of the Metropolitan Area north and south along the N7 out to Rathcoole and Newcastle. The noted rural character of these villages and hinterlands would be visually eroded.

#### **4.0 DETERMINATION IN TERMS OF ARTICLE 13K OF THE REGULATIONS**

4.1 South Dublin County Council considers that the proposed variation is likely to have significant effects on the environment but that an assessment of this proposal has already taken place within the SEA process of the South Dublin County Development Plan 2010 – 2016 (see Appendix 2) which included the following;

- a) Pre-Adoption of Draft Development Plan
- b) Draft Plan Consultations
- c) Draft Development Plan Amendments Stage
- d) Post Amendment Report on Submissions
- e) Assessment of Motions prior to the Adoption of the Development Plan
- f) Post Adoption of the Development Plan i.e. SEA Statement

The process in relation to the proposal (which is now presented as proposed Variation No. 2) included assessment of motions, consultation with the Environmental Authorities and the public, public display and the overriding requirement that the attention of the Elected Representatives was drawn to the requirement *that “the Environmental Report, the opinions expressed by the environmental authorities .....must be taken into account during the preparation of the plan and before its adoption”* (Article 8 of the SEA Directive). It is considered that this process fulfils the SEA requirements under National and European Commission legislation.

#### **5.0 CONSULTATIONS**

The Screening Report (5<sup>th</sup> March 2012) determined that while the implementation of the Development Plan Variation No. 2 for Casement Aerodrome, Baldonnell would be likely to have significant environmental effects, it was considered that the environmental assessment of a variety of motions related to the Security Zone relaxation within the South Dublin County Development Plan 2010 – 2016 Strategic Environmental Assessment process already fulfils the SEA requirements under National and European Commission legislation.

The Councils then issued a formal notice on the 9<sup>th</sup> March 2012 to

- The Environmental Protection Agency (EPA)
- The Department of the Environment, Community and Local Government (DOECLG)
- The Department of Arts, Heritage and the Gaeltacht (DOAHG)
- The adjoining Local Authorities of Dun Laoghaire Rathdown, Wicklow, Kildare, Fingal and Dublin City

in accordance with the Planning and Development (Strategic Environmental Assessment) Regulations 2004 - 2011, providing them with an opportunity to comment on whether or not they consider significant effects on the environment would be likely to arise. The Screening Report accompanied the notice.

The EPA replied that the Councils' position with regard to the need for Strategic Environmental Assessment (SEA) of the Plan was noted and stated that it is a matter for South Dublin County Council to determine whether or not any future proposed Variations would be likely to have

significant effects on the environment. They also provided an updated SEA Guidance Document and SEA Pack with their submission.

The response from Kildare County Council indicated that the Council has no submissions or observations to make in relation to the contents or conclusions contained in the Screening Report relating to the proposed Variation No. 2 of the South Dublin Development Plan.

No further comments or submissions were received.

## **6.0 SCREENING DECISION**

Following the three week statutory consultation period, the Council has determined that while the proposed Variation No. 2 would be likely to have significant effects on the environment, it is considered that the environmental assessment of a variety of motions related to the Security Zone relaxation within the South Dublin County Development Plan 2010 – 2016 Strategic Environmental Assessment process already fulfils the SEA requirements under National and European Commission legislation. This decision has been made taking account of relevant criteria set out in Schedule 2A of the SEA Regulations, the previous environmental assessment of the proposal during the South Dublin County Development Plan 2010 – 2016 process and the submissions or observations received in response to the notice.

The Screening Report has since been updated taking account the relevant submissions or observations received in response to the notice to become this Screening Decision, copies of which will be made available for public inspection at the offices of the Council during opening hours and on the Council website at [www.sdcc.ie](http://www.sdcc.ie). A copy of the Screening Decision will also be sent to the relevant environmental authorities in accordance with A7 – 13K (5)(a) the Planning and Development (Strategic Environmental Assessment) Regulations 2004 - 2011.

**Planning Department,  
South Dublin County Council,  
County Hall,  
Tallaght, Dublin 24.**

## Appendix 1

### South Dublin County Development Plan 2010-2016:

#### Proposed Variation No. 2 – Casement Aerodrome, Baldonnell

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##### Introduction

Proposed Variation No. 2 to the South Dublin County Development Plan, 2010-2016 relates to Casement Aerodrome, Baldonnell. The Variation proposes to insert a protocol into the Plan which would facilitate development of zoned land within the Casement Aerodrome security zone, without compromising the security of the aerodrome. This would result in a number of changes to the Development Plan which can be summarised as follows:

- Deletion of two policies
- Insertion of one new policy
- Re-numbering of relevant policies accordingly
- Introduction of a new section into Schedule 4
- Other relevant minor amendments to the text.

The changes are set out in full below.

##### Background

Existing Policy EE41 of the South Dublin County Development Plan, 2010-2016 ‘Casement Aerodrome – Security Consultation Zone’ states

*‘It is the policy of the Council to seek to amend the Security Zone Restriction around Casement Aerodrome so that it becomes a Security Consultation Zone, within which standard security measures will be applied in line with international best practice at military and civilian aerodromes. Furthermore, the said issue shall be brought back to this Council within one year of adoption of this Development Plan to be considered by way of variation of the Development Plan when full technical and legal advice is available to the Members’.*

Since the adoption of the Development Plan in October 2010, the Planning Department has engaged in discussions with the Department of Defence in order to pursue the provisions of the above policy.

Arising from this work, Councillors agreed at the meeting of South Dublin County Council on 13<sup>th</sup> February 2012, to the initiation of statutory procedures for the making of Variation No. 2 to the Development Plan (the second Variation to date). In event of the Members varying the Development Plan, it would result in a protocol being inserted into the Plan. The effect of this protocol would be to allow the Planning Authority to consider appropriate development of zoned land within the Casement Aerodrome security zone, without compromising the security of the aerodrome.

The proposed amendments to the Development Plan are set out below. The text to be amended is contained in two locations in the Plan; the ‘Enterprise and Employment’ section (within Theme 3, ‘A Busy Place’); and Schedule 4 ‘Casement Aerodrome, Baldonnell’.

It is considered that the amendments comprising proposed Variation No. 2 allow for a clear balance to be struck between facilitating the development of zoned land, and the maintenance of appropriate security at Casement Aerodrome, which will allow for the future proper planning and sustainable development of the area.

## **VARIATION NO. 2: FULL TEXT OF PROPOSED AMENDMENTS TO SOUTH DUBLIN COUNTY DEVELOPMENT PLAN, 2010-2016**

*Note: Text proposed to be deleted in red strikethrough; proposed additional text in green.*

The relevant extract set out below is from Theme 3 'A Busy Place', Section 2, 'Enterprise and Employment'.

### **3.2.22 Aerodromes**

The Council recognises the strategic location of Casement Aerodrome, Baldonnell, in the County and within the Metropolitan Area and in proximity to the rapidly developing major enterprise and employment areas e.g. Grange Castle, Citywest and Greenogue. The Council will co-operate with the County Development Board, State authorities, statutory bodies and other agencies in examining the potential of the development of the aerodrome for joint military/civilian use to contribute to the future economic development of the County. It is an objective of the Council that Casement Aerodrome shall retain its current status in the Plan while accepting the need to investigate the future of the airport.

The use of land for the purpose of an aerodrome requires planning permission. In considering such applications, the Council will have regard to the advice of the statutory bodies responsible for the control and safety of such operations, in addition to considering the proposal in the context of the proper planning and sustainable development of the area and the protection of amenities.

Proposals for the location of landfill sites within the County, together with development proposals in the environs of the Aerodrome within or under a flight path for any purpose which is likely to attract birds, shall be referred to the Department of Defence and the Irish Aviation Authority for comment.

### **3.2.23 POLICY**

#### **3.2.23.i Policy EE39: Casement Aerodrome and the Department of Defence**

**It is the policy of the Council to seek the cooperation of the Department of Defence and other Government departments and agencies in the carrying out of a study on the safety and security implications of the development of Casement Aerodrome for joint military/civilian uses.**

#### ~~3.2.23.ii Policy EE40: Restriction Area at Casement Aerodrome~~

~~It is the policy of the Council to again negotiate with the Department of Defence with the aim of reducing the no-development restriction area at Casement Aerodrome, Baldonnell to that of norm at international airports generally, thus allowing some currently zoned lands to be opened up for use.~~

#### ~~3.2.23.iii Policy EE41: Casement Aerodrome — Security Consultation Zone~~

~~It is the policy of the Council to seek to amend the Security Zone Restriction around Casement Aerodrome so that it becomes a Security Consultation Zone, within which standard security measures will be applied in line with international best practice at military and civilian aerodromes. Furthermore, the said issue shall be brought back to this Council within one year of adoption of this Development Plan to be considered by way of variation of the Development Plan when full technical and legal advice is available to the Members.~~



### 3.2.23ii Policy EE40: Requirements for Development within the Security Zone at Casement Aerodrome, Baldonnell

In considering appropriate development within the Security Zone adjacent to the Aerodrome, the following requirements shall be addressed either as part of a development submission or as a condition of permission where appropriate:

- **Sterile Zone:** A sterile zone shall be created from the existing Aerodrome boundary fence to the boundary of the development, subject to a minimum width of 2.5 metres. This zone shall be gated with access confined to Defence Forces Personnel (or other by arrangement). The Department of Defence reserves the right to install alarm systems in this area.
- **Boundary Fence of Development:** A 3 metre high clear visibility fence with integrated ram defence barriers, shall be erected where the development shares a boundary with the Aerodrome.
- **CCTV:** Any new development along the aerodrome perimeter shall be covered by tilt and zoom cameras with a minimum zoom of 20:1, or an improved magnification as agreed. Facilities shall be provided for the images from these cameras to be shared with the military authorities as and when required.
- **Building Restrictions:**
  - No buildings shall be located within 10 metres of the edge of the sterile zone (use of this area for car parking may be acceptable).
  - Site layout to be designed with roads and yard areas located near the aerodrome boundary to provide clear lines of sight for monitoring and surveillance.
  - Buildings overlooking the perimeter shall have limited windows (with frosted glass) above ground floor level
  - Roofs shall be secure and only accessible using high lift machinery. Roof surfaces shall provide no opportunity to remain hidden from view. Roofs on perimeter side shall have no view into the aerodrome.

### 3.2.23.iv iii Policy EE42 EE41: Weston Aerodrome and Statutory Bodies

It is the policy of the Council to have regard to the advice of the statutory bodies responsible for the control and safety of operations at Weston Aerodrome, in the context of the proper planning and sustainable development of the area and the protection of amenities. It is also the policy of this Council to seek to revert the International Civil Aviation Organisation (ICAO) runway classification of Weston Aerodrome from its current Code 2B classification to Code 1A.

### 3.2.23.iv Policy EE43 EE42: Casement Aerodrome, Baldonnell

It is the policy of the Council to promote the development of Casement Aerodrome, Baldonnell for joint military/civilian uses.

Applications for development in the vicinity of Casement Aerodrome will be required to meet the Council's development management criteria. The observations of the Department of Defence will also be taken into account. **Development within the Security Zone must comply with the provisions of policy EE40 'Requirements for Development within the Security Zone at Casement Aerodrome, Baldonnell' (as set out above).** The Council is aware of the powers of the Minister of Defence under the Defence Act 1954, particularly those relating to "protected area orders" under Section 36 of the Act.

### 3.2.23.vi Policy EE44 EE43: Encroachment

It is the policy of the Council to prevent encroachment of development around Weston Aerodrome which may interfere with its safe operation.

## 3.2.24 General Guidance for Development in the Vicinity of Aerodromes

General Guidance for Development in the Vicinity of Aerodromes is set out below. The restricted areas are indicated on the Development Plan Index Map. Applications for development in the vicinity of the aerodromes will be notified to the Irish Aviation Authority (IAA). The IAA will advise the Council of potential hazards to air navigation.

- In the document 'Review of Policy at Casement Aerodrome, Baldonnell, Co. Dublin' (January 2009), Public Safety Zones have been introduced within the existing 'red zones'. No development whatsoever is permitted within the Public Safety Zones. However, within the 'red zones', some development may be permissible whereby the development could not reasonably expect to increase the number of people working or congregating in or at the property. This may include development such as the extension of an existing dwelling or a change of building use. However, new developments with a high intensity of use would continue to be prohibited. Height restrictions would continue to apply to developments in the environs of the Aerodrome. In the inner Approach Areas to Weston Aerodrome (coloured solid red on the Development Plan Index Map), no new development is permitted.
- Under the outer Approach Areas graded heights of development may be permitted, to a maximum gradient of up to 1.2% commencing from actual ground elevation at 60m from the relevant runway end. [Indicative maximum height guidance is provided on the Development Plan Index Map as to likely possible heights above mean sea level at various specific distances along the centrelines of these outer Approach Areas].
- Above the 116m contour (and outside the Approach Areas), where any development is being considered, such development should not normally be higher than 15m above ground level.
- Below the 110m contour (outside all Approach Areas ~~and the Casement Aerodrome Security Zone~~ and at least 215m laterally from the runway at Weston) development of 20m in height would normally be permissible in most areas (from an aviation safeguarding point of view). Additional heights may also be possible below the 110m contour (depending on actual ground elevation) up to the elevations of the lowest Obstacle Limitation Surface (i.e. the Inner Horizontal Surface or the Conical Surface for either Weston or Casement Aerodromes, as indicated on Index Map).
- Between the 110m and 116m contours, the maximum height above ground level for any development would vary from 20m (at the 110m and 111m contours) to 15m (at the 116m contour).
- The application of ICAO standards will not prejudice the development of zoned lands in Rathcoole.
- Other developments which may not fall into the above broad categories would be subject to individual aeronautical assessment, with the ordnance datum elevations of their highest points being of particular importance.
- Planning applications for proposed developments exceeding 45m in height shall be submitted to the Irish Aviation Authority for assessment and comment.
- Proposals for the location of landfill sites within the County, together with development proposals in the environs of the Aerodrome within or under a flight path for any purpose which is likely to attract birds, shall be referred to the Department of Defence for comment.
- The Council will use its development management powers to prevent the encroachment of development around the aerodrome which would interfere with its safe operation. (Schedules 4 and 5)

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## Schedule 4 – Casement Aerodrome, Baldonnell (Full text)

### Section 1: Security

#### *Requirements for Development within the Security Zone at Casement Aerodrome, Baldonnell*

In considering appropriate development within the Security Zone adjacent to the Aerodrome, the following requirements shall be addressed either as part of a development submission or as a condition of permission where appropriate:

- ***Sterile Zone:*** A sterile zone shall be created from the existing Aerodrome boundary fence to the boundary of the development, subject to a minimum width of 2.5 metres. This zone shall be gated with access confined to Defence Forces Personnel (or other by arrangement). The Department of Defence reserves the right to install alarm systems in this area.
- ***Boundary Fence of Development:*** A 3 metre high clear visibility fence with integrated ram defence barriers, shall be erected where the development shares a boundary with the Aerodrome.
- ***CCTV:*** Any new development along the aerodrome perimeter shall be covered by tilt and zoom cameras with a minimum zoom of 20:1, or an improved magnification as agreed. Facilities shall be provided for the images from these cameras to be shared with the military authorities as and when required.
- ***Building Restrictions:***
  - No buildings shall be located within 10 metres of the edge of the Sterile Zone (use of this area for car parking may be acceptable).
  - Site layout to be designed with roads and yard areas located near the aerodrome boundary to provide clear lines of sight for monitoring and surveillance.
  - Buildings overlooking the perimeter shall have limited windows (with frosted glass) above ground floor level
  - Roofs shall be secure and only accessible using high lift machinery. Roof surfaces shall provide no opportunity to remain hidden from view. Roofs on perimeter side shall have no view into the aerodrome.

### Section 2: Aviation

#### Explanatory Note

The County Council policy with respect to Casement Aerodrome Baldonnell differs in **three** **two** material respects from the policy outlined by the Department of Defence at the time of adoption of the County Development Plan. The differences are as follows;

1. The Department of Defence has stipulated that all existing runways at Casement Aerodrome are categorised as instrument approach runways. However, Council policy excludes runway 05 from this category, and categorises it as a visual approach runway because of the land contours in the approach path.
2. In the document 'Review of Policy at Casement Aerodrome, Baldonnell, Co. Dublin' (January 2009), Public Safety Zones have been introduced within the existing 'red zones'. No development whatsoever is permitted within the Public Safety Zones. However, within the 'red zones', some development may be permissible whereby the development could not reasonably expect to increase the number of people working or congregating in or at the property. This may include development such as the extension of an existing dwelling or a change of building use. New developments with a high

intensity of use would continue to be prohibited and height restrictions would continue to apply to developments in the environs of the Aerodrome. However, Council policy reduces the distance within which no development is allowed on lands lying under the runway approach surfaces, for runway 05 (Rathcoole end) and runway 23 (Corkagh Park end), to that shown on Development Plan maps i.e. 1,100 metres (3,610 feet).

- 3. ~~It is the policy of the Council to seek to amend the Security Zone restriction around Casement Aerodrome, Baldonnell, so that it becomes a Security Consultation Zone, within which standard security measures will be applied in line with international best practice at military and civilian aerodromes.~~**

#### **S.4.0 County Council Policy, Casement Aerodrome**

Casement Aerodrome was constructed in 1917/18 and has since remained in continuous aviation use. It is the only fully equipped military airbase in the State and has served as the main centre of Air Corps operations since 1922. As the principal Air Corps base, it facilitates the vast majority of military training and operational aircraft movements. Approximately 1,250 military personnel and 100 civilians are based at the aerodrome and as such it is a major employer in the area. The last major expansion of the airfield took place in 1954/56 when the existing concrete runways were constructed. In the period from 1977 to 1986 a major upgrading programme was undertaken to modernise aerodrome installations and to facilitate the operation of military passenger carrying aircraft operating to the equivalent of public transport category.

It is a general policy and objective to do everything possible to ensure the safety of military air traffic, present and future, throughout the State and in particular, air traffic at and en route to and from Casement Aerodrome. The policy also has full regard for the safety of persons on the ground as well as the necessity for causing the least possible inconvenience to local communities. The achievement of this policy and objective necessitates, *inter alia*, some restrictions on building developments in the environs of the aerodrome. The extent of the restriction necessary in any particular instance depends on its purpose. In some cases more than one purpose may have to be served in which case a combination of the restrictions that will satisfy all the purposes to be served is necessary.

In general, restrictions are necessary;

- (a) to maintain the airspace around the aerodrome free from obstacles so as to permit aircraft operations to be conducted safely;
- (b) to reduce the slight risk to persons on the ground and the increased risk to occupants of an aircraft in the event of the aircraft accidentally touching down outside the aerodrome boundary while taking off or approaching to land;
- (c) to eliminate potential sources of interference with the operation of electronic navigation aids;
- (d) to obviate possible hazards to aircraft through the generation of smoke, dust or fumes which may reduce visibility;
- (e) to control the locations of any activities which may be an attraction to birds,
- (f) to limit the extent, height and type of external lighting which may confuse pilots in the clear interpretation of aeronautical lights or which may cause dazzle or glare;
- (g) to diminish the nuisance caused to the local communities by aircraft noise insofar as this is practicable.

In the case of (a) above, the dimensions and slopes of the International Civil Aviation Organisation (ICAO) obstacle limitation surfaces that define the limit to which objects may project into the airspace around aerodromes are stated in Annex 14 Aerodromes.

ICAO standards are applied as policy by the Department of Defence at Casement Aerodrome. The most relevant of the ICAO limitation surfaces are the approach, transitional, inner horizontal and conical surfaces for all runways. These surfaces have been established in relation to Casement Aerodrome for the purpose of this policy.

The existing main runway 11/29 at Casement is categorised as a Code 4 instrument approach runway. Runway 23 is a Code 3 instrument runway and has two instrument approaches associated with it.

In accordance with ICAO regulations, an instrument approach surface (for runways in excess of 1,200 metres) originates 60m beyond the runway threshold, has an inner edge width of 300m and diverges at a rate of 15% at each side. The surface extends outwards from the threshold for an overall distance of 15km. Restrictions relating to the areas lying under the approach surfaces are detailed later in the policy. At the sides of the runway flight strip there are transitional surfaces which slope upwards and outwards at 14.3% (1 in 7) to a height of 45m above the aerodrome elevation where they meet the inner horizontal surface. The inner horizontal surface is an obstacle limitation surface extending to 4km (in all directions) from the centreline of the runway (or runway strip) at an elevation of 45m above the threshold altitude of Runway 11. The inner horizontal surface does not apply where it is above the runway approach and transitional surfaces.

All of these surfaces have been established for Casement and no new objects shall be permitted to penetrate them. The full extent of the restricted areas around Casement is shown on the Development Plan Maps **(Please see Explanatory Note to this Schedule)**.

With regard to (b), if an aircraft should accidentally touch down, it is most likely that this would happen during landing or take-off of a flight. The point of accidental touchdown would in all probability be within or not far outside the boundary of the aerodrome and more or less in line with the runway that the aircraft is approaching or leaving. If an incident of this nature were to take place in the approach area of an instrument runway, it would be apt to be more serious, relatively speaking, than if it took place in the approach to a non-instrument runway, because instrument runways are normally used by the larger types of aircraft and serve by far the most traffic. They are also available in weather conditions that would preclude the use of a non-instrument runway.

Having regard to the slight risk to persons on the ground and the increased risk to the occupants of an aircraft in the event of aircraft accidentally touching down on approaching or leaving a runway, it is highly desirable that the lands lying under the runway approach surfaces, particularly instrument runway approach surfaces, should be kept as free as possible of buildings for some distance outwards from the aerodrome boundary. In the document *Review of Policy at Casement Aerodrome, Baldonnell, Co. Dublin* (January 2009), Public Safety Zones have been introduced within the existing 'red zones'. No development whatsoever is permitted within the Public Safety Zones. However, within the 'red zones', some development may be permissible whereby the development could not reasonably expect to increase the number of people working or congregating in or at the property. This may include development such as the extension of an existing dwelling or a change of building use. However, new developments with a high intensity of use would continue to be prohibited. Height restrictions would continue to apply to developments in the environs of the Aerodrome.

~~For safety and security reasons, it is also policy that no new development be permitted within the restricted area shown on the Maps and which comprises the aerodrome and lands immediately adjoining the aerodrome boundary. It is appreciated that there are already some buildings in both of these areas but the majority of these pre-date the airport or are in areas where heretofore restrictions did not apply. It is desirable that the existing situation should not be permitted to worsen. However, objection to the grant of planning permission for domestic extensions to existing dwellings located within restricted areas will not be made provided that:~~

- ~~(a) — the area of the extension is not considered excessive and in any event does not exceed a fifty percent increase in the floor area of the existing building;~~
- ~~(b) — the building is used as a domestic residence only and the proposal does not constitute a change in use, e.g. to bed and breakfast, hotel, or any use of a commercial nature;~~
- ~~(c) — the height of the building is not increased.~~

**Elsewhere in the inner zone, no buildings or structures exceeding 20m in height above ground level should be permitted, with further height restrictions related to the ICAO transitional surfaces (which are not shown on the Development Plan maps) from a distance of around 300m (depending on ground elevation) to the runway centrelines, graded down to zero at the edges of the flight strips. However, in view of the volume of helicopter operations and the level and variety of aircraft training movements and for safety and security reasons, planning applications for structures such as high mast lighting, antennae etc. in the inner zone in close proximity to the aerodrome or the runway**

**approaches will be the subject of a special examination to ensure that their construction would not be undesirable for safety, security or operational reasons.**

With regard to (c) the electronic aids normally provided to assist in the navigation of aircraft include surveillance and precision approach radars, instrument landing systems, omnidirectional radio ranges, distance measuring equipment, VHF transmitter/receivers and locators, all of which are sited within or near the aerodrome. Since the response of electronic equipment can differ greatly depending upon the characteristics of the particular site where it is installed, it is not possible to provide a single set of criteria necessary for its interference-free operation in all cases.

Insofar as the radar installations are concerned, it is necessary that the highest points of buildings or structures in close proximity of the radar antenna should be kept below the level of the radar tower platform. To minimise reflection problems it is necessary that buildings and other structures in the neighbourhood of a radar antenna be constructed of non-metallic materials having low reflectivity at microwave frequencies. No building should block the line of sight from a radar antenna to the airspace in approaches to runways and other critical airspace which can only be identified by the Air Corps Communications and Information Service.

An instrument landing system comprises a localiser antenna sited on the extended centerline of the landing runway 200-300m beyond its remote end, and a glide path transmitter sited 150m to one side of the runway, opposite a point on the runway in the region of 300m to 450m inwards from the landing threshold. The minimum building restrictions necessary to obviate interference with the operation of the localisers, glide path transmitters and markers/locators are a matter for the Department of Defence.

Birds are a potential hazard to aircraft during all phases of flight and for that reason the disposal of garbage, offal etc. on lands in the environs at an aerodrome, and any other activity that could attract birds to the environment, including man-made features, is objectionable. Accordingly, the locations of refuse dumps or refuse transfer stations in the vicinity of aerodromes need to be regulated in consultation with the Department of Defence. The County Council shall also make known the locations of any proposed landfill or civic amenity facilities. These requirements exist within an 8 statute mile (13 km) radius circle centred on the aerodrome and no landfill to be within an 8km radius.

Bright external lights above a horizontal plane through the light fittings may be confusing to pilots of aircraft and are likewise objectionable in the vicinity of an aerodrome. Industrial processes that would generate smoke, dust or steam in such volume as would restrict visibility are to be avoided in the neighbourhood of the runway approaches.

Applications by statutory bodies for overhead electricity lines, cross country pipelines and generating stations also warrant special consideration by the Department of Defence.

It is not possible to lay down guidelines for improving safety on existing roads near runway ends. However, in recognition of the slight risks posed by roads crossing runway approaches, particularly where lighting of the roads is included or proposed in the future, the local planning authority shall consult the Department of Defence about any proposal to build a new road or to improve an existing road where it is planned to run close to the end of or cross the line of any runway. All such roads should be equipped with lighting which does not shine above the horizontal plane.

Casement Aerodrome is the only secure military aerodrome in the State. The requirement for such a facility has been underlined by its use for the highest level intergovernmental tasks and for sensitive extraditions. The arrivals area is not overlooked from any building in close proximity and consequently, there is a requirement **to impose restrictions on development** ~~continue the limitation of development~~ in that area and in close proximity to the aerodrome boundary.

The development of lands for residential purposes in areas that are or will be exposed to a high level of aircraft noise is very undesirable from the point of view of both the Department of Defence and future residents. Speculative builders may not be fully aware of the noise nuisance to which residents in these areas would eventually be exposed and individuals and families could unknowingly purchase dwellings only to learn later of the extent of the nuisance and of the

inconvenience to which they would be put if it should subsequently be found necessary to insulate their dwellings against noise. The necessity for noise insulation in dwellings being exposed to high levels of noise should be avoided by prohibiting or severely curtailing their construction in areas that are or will be exposed to a high noise level.

A preliminary forecast of aircraft noise in the vicinity of Casement Aerodrome has been prepared for the guidance of the planning authorities and other interested parties. In the forecast, the future level of aircraft noise to which the various parts of the lands in the environs of the aerodrome will be exposed has been calculated. The area within which aircraft noise may be significant is indicated on the Development Plan Maps. If unrestricted residential developments are permitted in areas that are or will ultimately be subject to a high level of aircraft noise, it may be that local residents would seek to impose severe restrictions on aircraft that could seriously interfere with the operation and development of air traffic at the aerodrome.

It is policy that residential development within the noise contour be limited and that in the event of the grant of permission, the occupants be advised that without adequate sound insulation, the level of aircraft noise at the site may be intrusive or annoying. The same considerations do not generally apply to commercial and industrial developments because of the background noises usually associated with such activities and because such activities are usually carried out in daylight hours and are not normally affected by the problem of noise at night-time. In some cases, however, it might be necessary to incorporate sound insulation in the construction of the buildings to the extent necessary to reduce exterior noise to an acceptable level for the conduct of business within the building.

Temporary structures, including mobile cranes which are likely to penetrate the ICAO surfaces established at Casement must be notified to and meet any requirements set down by the Department of Defence. Where the Council grants planning permissions to developments underlying such surfaces, it shall attach a note requiring that the applicant notify the Department of Defence of plans to erect cranes likely to penetrate the applicable ICAO surfaces and meet any requirements set down by the Department of Defence.

The Department of Defence shall be consulted on any proposed development, which by its nature, is likely to increase air traffic in the vicinity of Casement Aerodrome or affect the safety, efficiency or regularity of operations at Casement Aerodrome.

In conclusion, it is policy to facilitate the continued safe operation and development of air traffic at Casement. It is a requirement therefore that the policy of prohibiting or restricting development within the designated areas around Casement Aerodrome be rigorously enforced. These areas are indicated on the Development Plan Maps

## Appendix 2

### **South Dublin County Council Development Plan 2010 – 2016 Variation No. 2 Casement Aerodrome, Baldonnell – Previous Environmental Assessment of this variation and other relevant proposed policies in the Strategic Environmental Assessment process as part of the adoption of the South Dublin County Council Development Plan 2010 – 2016**

#### **Introduction:**

There were a number of proposals a) to relax the Department of Defense Security Zone restrictions and b) to rezone some of the area within the Security Zone and adjoining it along the N7 from a “Rural” to “Employment and Enterprise” throughout the Development Plan process.

The relaxation in the development restrictions in the Security Zone on land which could be shown not to compromise the security of the aerodrome was a change from the position where there was almost a blanket prohibition (apart from small domestic extensions to existing dwellings) on development within the Security Zone.

In the County Development Plan 2010 – 2016, some of the land adjacent to the aerodrome previously zoned “To protect and improve Rural Amenity and to provide for the development of Agriculture”, was rezoned EP2 i.e. “To facilitate opportunities for manufacturing, Research and Development facilities, light industry, and employment and enterprise related uses in industrial areas and business parks”. This rezoning was contrary to the advise of the Manager at that time.

While there are two distinct aspects apparent here, i.e. the rezoning of the land from agriculture to Employment and Enterprise and the relaxation of the interpretation of the restrictions of the Security Zone, the combined outcome of the of the two is to potentially allow development on land that was previously all but sterilised apart from agricultural use.

These motions or amendments to the Plan, where adopted, were subjected to the parallel Strategic Environmental Assessment process at the following stages;

1. Pre-Adoption of Draft Development Plan
2. Draft Plan Consultations
3. Draft Development Plan Amendments Stage
4. Post Amendment Report on Submissions
5. Assessment of Motions prior to the Adoption of the Development Plan
6. Post Adoption of the Development Plan

#### **1. Pre-Adoption of Draft Development Plan**

Prior to the adoption of the Draft Plan, an environmental assessment of the motions submitted by the Elected Representatives pertaining to the Manager’s Draft Plan was prepared (1st Sept 2009). The assessment noted whether the policies would generally improve, conflict with, conflict with and be mitigated, or have a neutral affect on the SEOs.



168 1974 0	R. Dowds	That it is the policy of South Dublin County Council to again negotiate with the Department of Defence with the aim of reducing the no development restriction area at Baldonnell Airport to that of norm at international airports generally, thus allowing some currently zoned lands to be opened up for use.  ***** (Biodiversity/Transport/Heritage/Landscape/Rivers) Restrictions currently in place around Baldonnell aerodrome have retained significant amounts of rural lands as green fields. Removal of these restrictions could have significant effects on river systems and biodiversity corridors, the landscape, and increase car based movements unless proposed policies relating to the 3 tiers of employment zoning, landscape assessment, riparian zone retention and the provision of a green network are enacted.	B3 HH1 C1 C2 CH2 W1 L1
169 1964 0	T. Gilligan	That the Manager outlines a plan for Casement Aerodrome, Baldonnell	Uncertain impacts on SEOs

<b>B1</b>	Avoid loss of habitats etc in designated ecological sites
<b>B2</b>	Avoid impacts by development within or beside these sites
<b>B3</b>	Prevent loss of ecological networks
<b>HH1</b>	Protect human health - traffic/ incompatible landuses
<b>S1</b>	Re-use of brownfield lands
<b>S3</b>	Operate sustainable waste management practices
<b>W1</b>	Maintain and improve river, lake and surface water quality
<b>W2</b>	Prevent pollution of ground water
<b>W3</b>	To prevent floodplain development
<b>C1</b>	Reduce greenhouse emissions from travel
<b>C2</b>	To reduce car dependency.
<b>M1</b>	Appropriate waste water treatment for new development
<b>M2</b>	Quality of drinking water
<b>CH1</b>	Protect archaeological heritage
<b>CH2</b>	Protect architectural heritage
<b>L1</b>	To protect the landscape

## 2. Draft Plan Consultations

After consideration of the Manager's Report on the public consultation of the Draft Plan, the elected members submitted a series of motions for consideration. Environmental Assessment of the member's motions was undertaken prior to the council meetings in May 2010.

Ref No.	Councillor	Motion	Response
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2309 6	T. Delaney	<p>To amend the current Department of Defence Security Zone restriction around Casement Aerodrome, Baldonnell, so that it becomes a Security Consultation Zone, within which standard security measures will be applied in line with international best practice at military and civilian aerodromes.</p> <p>This could be achieved with specific design restrictions being imposed through conditions of permission, as necessary, to provide the required levels of security.</p> <p>This would remove the unnecessary restrictions that are imposed on privately owned land in the vicinity of Casement Aerodrome</p> <p>(Biodiversity/Transport/Heritage/Landscape/Rivers) Restrictions currently in place around Baldonnell aerodrome have retained significant amounts of rural lands as green fields. Removal of these restrictions could have significant effects on river systems and biodiversity corridors, the landscape, and increase car based movements.</p>	<p><b>B3 W1 W3 C1 C2 HH1 S1</b></p>
2341 1 & 2348 4	D. Keating	<p><b>Schedule 5 – Casement Aerodrome, Baldonnell:</b> It is the policy of this Council to amend the current Department of Defence Security Zone Restriction around Casement Aerodrome, Baldonnell, so that it becomes a security Consultation Zone, within which standard security measures will be applied in line with international best practice at military and civilian aerodromes. This will make serviced, accessible and zoned lands available for employment based uses, with specific design restrictions being imposed through conditions of permission, as necessary, to provide the required levels of security.</p> <p>(Biodiversity/Transport/Heritage/Landscape/Rivers) Restrictions currently in place around Baldonnell aerodrome have retained significant amounts of rural lands as green fields. Removal of these restrictions could have significant additional effects on river systems, such as the Camac (an already stressed and polluted river system) and biodiversity corridors. Significant impacts on the landscape would be envisaged if the motion were to be adopted. The levels of development proposed in these locations would result in the visual sprawl of the Metropolitan Area north and south along the N7 out to Rathcoole and Newcastle. The oft noted rural character of these villages and hinterlands would be visually eroded.</p> <p>The Draft Plan has proposed locations for EP1-EP3 zoned lands, based on need and suitable location. The rezoning of large additional areas of agricultural land for industrial purposes would undermine the development strategy outlined in the Environmental Report, and would facilitate the sprawl of industrial development in numerous locations in the county, rather than in certain appropriate areas.</p>	<p><b>B3 W1 W3 C1 C2 HH1 S1</b></p>

### 3. Draft Development Plan Amendments Stage

After adoption of the Manager's Report and Councillor's motions at the May 2010 council meeting, the Variation to the Draft Development Plan went on public display for a period of 4 weeks, accompanied by an Environmental Assessment of the variations (June 2010).

#### 3.2.21.ii

##### **Policy EE39a Casement Aerodrome – Security Consultation Zone**

**It is the policy of the Council to amend the current Department of Defence Security Zone Restriction around Casement Aerodrome so that it becomes a Security Consultation Zone, within which standard security measures will be applied in line with international best practice at military and civilian aerodromes. The state airports at Dublin, Cork and Shannon operate the highest levels of security. The security measures at Baldonnell should be the same as those imposed at these state airports.**

The proposed amendment may result in negative environmental impacts through increasing development pressure on a rural zoned area, however such conflicts would be likely to be mitigated by measures which have been integrated into the draft Plan, including those which have arisen from the SEA process.

#### **PA 228**

**To zone the serviced and accessible lands along the northern side of the N7 Naas Road, between Baldonnell Business Park, the Newcastle Road, the southern property boundary adjacent to runway 05/23 of Casement Aerodrome and the public safety zone to the south-west of runway 05/23 as Objective EP2 “ To facilitate opportunities for high-end manufacturing, R & D facilities and light industrial employment and related uses in industrial areas and business parks” to provide high profile, high quality and deliverable sites to attract investment into this County.**

The proposed rezoning would undermine the development strategy of the Development Plan as assessed by the Environmental Report. This would have direct negative consequences for Biodiversity (river and hedge systems)/Transport (no high quality public transport nearby)/Heritage (impacts on RMP021-021 & 021-020/Landscape (Visual Sprawl in a rural area)/Rivers (Camac)/Flooding (Camac) in the zoned area, as well as indirectly having negative effects on the sustainable reuse of brownfield sites, biodiversity, landscape, and increased car usage. The Draft Plan has proposed locations for EP1-EP3 zoned lands, based on need and suitable location.

The rezoning of large additional areas of agricultural land for industrial purposes would undermine the development strategy outlined in the Environmental Report, and would facilitate the sprawl of industrial development in numerous locations in the county, rather than in certain appropriate areas.

### 4. Post Amendment Report on Submissions

Environmental Assessment (29th July 2010) of the public submissions received was undertaken as a result of the second round of public consultations. These assessments were included as a separate schedule accompanying the Manager's Report sent to the Elected Members.

Extracts relevant to South Dublin County Council Development Plan 2010 – 2016 Variation No. 2 Casement Aerodrome, Baldonnell– SEA Screening from “Response to the Environmental Issues arising from Submissions following the public display of the Proposed Amendments to the Draft South Dublin County Development Plan 2010 – 2016 and Environmental Report - Addendum 2 (29th July 2010)”

Submission	Response.
<p><b>PA211 Schedule 4 Casement Aero.</b></p> <p><b>(Dept of Defence)</b> Casement Aerodrome Baldonnell. Item 2- it is the policy of the Dept. of Defence that the distance within which no development is allowed on lands lying under the approaches to runway 05/23 is 1,350 metres- the Dept. will continue to ensure that this is enforced.</p> <p><b>(SIAC)</b> Casement Aerodrome Baldonnell:- Requests clarification that the motions adopted by the members of the Council, which intended that development would be able to proceed on zoned lands within the security zone, subject to conforming with appropriate security arrangement for such locations are reflected in the plan.</p> <p><b>(SIAC)</b> Casement Aerodrome Baldonnell:- The amendment to this paragraph allows for some limited development to be permitted in principle in the red zoned. Therefore the phrase that states “within which no development is allowed” should be amended to reflect this change.</p> <p><b>(SIAC)</b> Casement Aerodrome Baldonnell:- Requests that the criteria for determining the acceptability of development within the red zones should be in accordance with national and international best practice, as applied at Dublin, Cork and Shannon airports and that Schedule 4 should be amended to reflect this.</p> <p><b>(SIAC)</b> Casement Aerodrome Baldonnell:- Requests the omission of any reference to ‘restricted area’ and any reference to an ‘objection to planning permission’</p> <p><b>(SIAC)</b> Casement Aerodrome Baldonnell:- Contends that proposed amendments made to Schedule 4 are made up of incomplete parts of two different motions (Motions 239 and 242) and therefore ‘dilutes’ the thrust of the motions adopted. Requests that the schedule be amended to reflect the motions adopted by the members of the Council; such as “that development of these lands is now permitted in principle, subject to conditions on scheme design addressing security.”</p>	<p>It was noted within an assessment of the Councillors Motions (April 2010) at the Draft Development Plan stage that adoption of motions to amend the security consultation zone and restriction area at Casement Aerodrome could have significant effects on river systems, such as the Camac (an already stressed and polluted river system) and biodiversity corridors, but these were likely to be mitigated.</p> <p>However, significant additional impacts on the landscape and habitats, which are unlikely to be mitigated, would be envisaged if the proposed amendments to the security zones and runway restrictions were to be adopted along with a subsequent rezoning for the surrounding lands from ‘B’ agriculture, to industrial zoned lands.</p> <p><b>Recommendation:</b> No change.</p>

**(SIAC) Casement Aerodrome Baldonnell:-** Believes that the paragraph “Casement Aerodrome is the only secure military aerodrome in the State.....the limitation of development in that area and in close proximity to the aerodrome boundary.” Is in conflict with the agreed motions 239 and 242 and should be amended.

**(SIAC) Casement Aerodrome Baldonnell:-** The conclusion paragraph of Schedule 4 refers to prohibition and restriction of development. Request for amendments to be made to this paragraph to reflect the decision made by the Council members.

**(South Dublin Chamber of Commerce)**

Casement Aerodrome Baldonnell: The South Dublin Chamber welcomes the positive changes made to the security arrangements at Casement Aerodrome, Baldonnell, brought about by the Amendment Ref. No. PA110 and the Amendment Ref. No. PA211. believe that implementation of a Security Consultation Area around and outside the aerodrome boundary will be effective and indeed that it will improve on the current arrangements in place at Casement Aerodrome.

**(South Dublin Chamber of Commerce)**

Casement Aerodrome Baldonnell: Concerned though that there is the possibility for interpretations other than those which the changes to the development sought to clarify and to this end we would urge that the development plan provide clarity and remove ambiguity in areas -For example, there are some amendments required to the Development Plan text to remove some outdated references in regard to the Red Zones, carried over from the previous Development Plan text.

**(South Dublin Chamber of Commerce)**

Casement Aerodrome Baldonnell: The Chamber believes that following the Council Motions debated in relation to Casement Aerodrome, there was a clear understanding that the intended consequence of passing the Motions was that when development was proposed within the security zone, on zoned lands, that development would be able to proceed subject to conforming with appropriate security arrangements for such locations; being largely matters that need careful design input to a scheme. This clarity is needed to prevent future misunderstanding or misinterpretation.



<p>Planning Guidelines for Guidelines for the greater Dublin Area 2010-2022.</p>	<p>The proposed amendments also appear to conflict with the strategic policies contained within the Regional Planning Guidelines (RPGs) for the Greater Dublin Area 2010-2022, as made in June 2010 i.e. Strategic Policy EP2 relating to sustainable economic growth and reduced volumes of commuting.  <b>Recommendation:</b> It is considered that the proposed amendment/rezoning <b>PA228</b> be omitted in order to prevent <b>significant negative residual impacts</b>.</p>
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## 5. Assessment of Motions prior to the Adoption of the Development Plan

After consideration of the Manager’s Report on the second round of public consultation, the Elected Members submitted amendments to motions for adoption within the Draft Development Plan. Apart from Motion 29 and 30, the motions are an attempt to return to the status quo in relation to the Security Zone, i.e. to retain the restrictions as favoured by the Department of Defence. Environmental Assessment of the amendments to motions (Sept 2010) was undertaken and was made available to the Elected Members.

### Extracts relevant to South Dublin County Council Development Plan 2010 – 2016 Variation No. 2 Casement Aerodrome, Baldonnell– SEA Screening from “Environmental Assessment of Elected Representatives Motions and Certain Headed Items, Draft Development Plan Meeting (September 6<sup>th</sup> 2010)

Motion/ Item No.	Proposed Amendment	Assessment
<p><b>Motion 21</b></p> <p><b>Item ID 24482</b></p> <p>E Tuffy</p>	<p><b>PA109</b>  Amend 3.2.21.ii Policy EE39: Restriction Area at Casement Aerodrome  To read.  “It is the policy of the Council to continue to negotiate with the Department of Defence regarding restrictions at Casement Aerodrome.</p>	<p><b>B1 B2 B3 W1 W3 M1 M2 CH1 CH2 C1 C2 HH1</b></p> <p><b>SEA Assessment.</b> It is uncertain whether negotiations with the Department of Defence would result in the easing of restrictions of development in the areas surrounding Baldonnell . It has been continually noted throughout the environmental assessment that these lands are visually and environmentally sensitive, and are not considered appropriate for significant development. It is noted however, that if the proposed amendment were to be accompanied by motion 24483, then a positive result would ensue.</p>
<p><b>Motion 22</b></p> <p><b>Item ID 24483</b></p> <p>E. Tuffy</p>	<p><b>PA110</b>  Delete Policy EE39A “Casement Aerodrome- Security Consultation Zone” as in June 2010 Amendment Ref. No. PA110  Replace with  Policy EE39A “Casement Area – Security</p>	<p><b>B1 B2 B3 W1 W3 M1 M2 CH1 CH2 C1 C2 HH1</b></p> <p><b>SEA Assessment.</b> It has been continually noted throughout the environmental assessment that</p>

	<p>Consultation Zone”          “It is the policy of the Council to continue to negotiate with the Department of Defence to prevent encroachment of development around Casement Aerodrome which would interfere with its safe operation”</p>	<p>these lands are visually and environmentally sensitive, and are not considered appropriate for significant development. Restricting development would maintain the defacto greenbelt between Newcastle and Clondalkin as well as the associated rivers and habitats.</p>
<p><b>Motion 27</b>   <b>Item ID 24485</b>           E. Tuffy</p>	<p><b>PA211.</b> Reinstate in Amendment Ref. No. <b>PA228</b> as in June 2010 Proposed Amendments to Draft Development Plan, the sentence “ For safety and security reasons, it is also the policy of the Council that no new developments be permitted within the restricted area shown on the maps and which comprises the aerodrome and the lands immediately adjoining the aerodrome boundary.”</p>	<p><b>B1 B2 B3 W1 W3 M1 M2 CH1 CH2 C1 C2 HH1</b></p> <p><b>SEA Assessment.</b> It has been continually noted throughout the environmental assessment that these lands are visually and environmentally sensitive, and are not considered appropriate for significant development. Restricting development would maintain the defacto greenbelt between Newcastle and Clondalkin as well as the associated rivers and habitats.</p>
<p><b>Motion 28</b>   <b>Item ID 24515</b>           G. O’Connell</p>	<p><b>PA211</b> on Casement Aerodrome I propose that the Managers recommendations on the matter be adopted.</p>	<p><b>B1 B2 B3 W1 W3 M1 M2 CH1 CH2 C1 C2 HH1</b></p> <p><b>SEA Assessment.</b> It has been continually noted throughout the environmental assessment that these lands are visually and environmentally sensitive, and are not considered appropriate for significant development. Restricting development would maintain the defacto greenbelt between Newcastle and Clondalkin as well as the associated rivers and habitats.</p>
<p><b>Motion 29</b>   <b>Item ID 24519</b>           T. Gilligan</p>	<p>To modify the Draft County Development Plan Index Map/ Map 3 to reduce the area of the ‘Security Consultation Zone’ to approximately 300 metres west from the edge of Runway 05/23. (For the avoidance of doubt, this area is not to be taken from the edge of the taxiway). This is in accordance with Policy EE39A of the Amended Draft County Development Plan. The flight safety zones (red zones) shall remain unaffected. Page ref. 126 Draft Amendment Plan 2010-2016</p>	<p><b>B1 B2 B3 W1 W3 M1 M2 CH1 CH2 C1 C2 HH1</b></p> <p><b>SEA Assessment:</b> Removal of the restrictions applied to the lands around Casement Aerodrome have potential to negatively impact on biodiversity, landscape, habitats, flooding and watercourses, however, these effects are likely to be mitigated, as long as the surrounding lands remain in agricultural use.</p> <p>However, significant additional impacts on the landscape and habitats, which are unlikely to be mitigated, would be envisaged if the proposed amendments to the security zones and runway restrictions were to be adopted along with a subsequent rezoning</p>



		for the surrounding lands from 'B' agriculture, to industrial zoned lands.
<p><b>Motion 30</b></p> <p><b>Item ID 24553</b></p> <p>T. Ridge</p>	<p>To modify the Draft County Development Plan Index Map/ Map 3 to reduce the area of the "Security Consultation Zone" to approximately 300 metres west from the edge of Runway 05/23. (For the avoidance of doubt, this area is not to be taken from the edge of the taxiway). This is in accordance with Policy EE39A of the Amended Draft County Development Plan. The flight zones (red zones) shall remain Unaffected. Page ref. 126 Draft Amendment Plan 2010-2016</p>	<p><b>B1 B2 B3 W1 W3 M1 M2 CH1 CH2 C1 C2 HH1</b></p> <p><b>SEA Assessment:</b> Removal of the restrictions applied to the lands around Casement Aerodrome have potential to negatively impact on biodiversity, landscape, habitats, flooding and watercourses, however, these effects are likely to be mitigated, as long as the surrounding lands remain in agricultural use.</p> <p>However, significant additional impacts on the landscape and habitats, which are unlikely to be mitigated, would be envisaged if the proposed amendments to the security zones and runway restrictions were to be adopted along with a subsequent rezoning for the surrounding lands from 'B' agriculture, to industrial zoned lands.</p>
<p><b>Headed Item 28</b></p>	<p>Recommended deletion to Proposed Amendment <b>PA228</b> which relates to zoning of lands, north of the Naas Road.</p>	<p><b>B1 B2 B3 W1 W3 M1 M2 CH1 CH2 C1 C2 HH1</b></p> <p><b>SEA Assessment.</b> As has been previously noted PA228 if adopted would undermine the development strategy of the Development Plan as assessed by the Environmental Report. This would have direct negative consequences for Biodiversity (river and hedge systems)/Transport (no high quality public transport nearby)/Heritage (impacts on RMP021-021 &amp; 021-020/Landscape (Visual Sprawl in a rural area)/Rivers (Camac)/Flooding (Camac) in the zoned area, as well as indirectly having negative effects on the sustainable reuse of brownfield sites, biodiversity, landscape, and increased car usage. The Draft Plan has proposed locations for EP1-EP3 zoned lands, based on need and suitable location.</p> <p>Deleting the amendments and maintaining the 'B' agriculture zoning for these lands is considered the most appropriate option.</p>
<p><b>Motion 31</b></p>	<p><b>PA228</b> Delete Amendment Ref. No. <b>PA228</b> as in June 2010 Proposed Amendments to</p>	<p><b>B1 B2 B3 W1 W3 M1 M2 CH1 CH2 C1 C2 HH1</b></p>

<p><b>Item ID</b> <b>24484</b></p> <p>E. Tuffy</p>	<p>Draft Development Plan- Zoning. Revert back to Draft Development Plan Map 3, where lands in question have zoning objective B “ To protect and improve rural amenity and to provide for the development of agriculture”</p>	<p><b>SEA Assessment.</b> As has been previously noted PA228 if adopted would undermine the development strategy of the Development Plan as assessed by the Environmental Report. This would have direct negative consequences for Biodiversity (river and hedge systems)/Transport (no high quality public transport nearby)/Heritage (impacts on RMP021-021 &amp; 021-020/Landscape (Visual Sprawl in a rural area)/Rivers (Camac)/Flooding (Camac) in the zoned area, as well as indirectly having negative effects on the sustainable reuse of brownfield sites, biodiversity, landscape, and increased car usage. The Draft Plan has proposed locations for EP1-EP3 zoned lands, based on need and suitable location.</p> <p>Deleting the amendments and maintaining the ‘B’ agriculture zoning for these lands is considered the most appropriate option.</p>
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## 6. Post Adoption of the Development Plan

Upon adoption of the County Development Plan 2010-2016, the SEA Statement was released. It included the following;

*“Overall, the influence of the SEA process on the Development Plan has been positive”. However “A series of amendments have been incorporated into the Plan which are likely to result in a range of significant negative environmental impacts. While some conflicts would be likely to be mitigated by measures which have been integrated into the draft Plan, including those which have arisen from the SEA process, there are likely to be significant residual negative impacts. The amendments that are likely to result in significant residual negative impacts are as follows”;*

One of six amendments was the adopted proposal to “Rezone lands along the northern side of the N7 Naas Road between Baldonnell Business Park and Casement Aerodrome.

The rezoning of large additional areas of agricultural land for industrial purposes would undermine the development strategy outlined in the Environmental Report, and would facilitate the sprawl of industrial development in numerous locations in the County, rather than in certain appropriate areas.

This would have direct negative consequences for Biodiversity (river and hedge systems)/Transport (no high quality public transport nearby)/Heritage (impacts on RMP021-021 & 021-020/Landscape (Visual Sprawl in a rural area)/River Flooding (Camac) in the zoned area, as well as indirectly having negative effects on the sustainable reuse of brownfield sites”.

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