To the Lord Mayor and Members of Dublin City Council Report No. 224/ 2019 Report of the Chief Executive



- (a) Planning and Development Act 2000 (as amended) & Planning and Development Regulations 2001 (as amended) (Part 8)
- (b) Local Government Act 2001 (as amended)

In compliance with the provisions of Section 179 of the Planning and Development Act 2000 (as amended) and Part 8 of the Planning and Development Regulations 2001 (as amended) and in compliance with the provisions of the Local Government Act 2001 and pursuant to the requirements of the above, notice is hereby given of Dublin City Council's intention to carry out the following works:

Application No: 3072/19

Proposal: LAW: Planning and Development Act 2000 (as amended)

Planning and Development Regulations 2001 (as amended) - Part VIII

Applicant: Dublin City Council, Environment and Transportation Department.

Location: Martello Tower, Strand Road, Sandymount, Dublin 4.

Proposal: Pursuant to the requirements of the above, notice is hereby given of the proposed construction of coastal flood defence measures around the sea side of the Martello Tower. The works consist primarily of the following:

- Construction of a reinforced concrete wall (70m in length and 800mm in height) around the sea side of the Martello Tower.

- Facing of the reinforced concrete wall with Leinster granite and Leinster granite coping.

- An 850mm high steel railing on top of granite coping.
- Installation of 2 no. flood gates.
- Erection of site compound within the car park opposite Gilford Road.

The Local Authority has concluded, following a preliminary examination, that there is no real likelihood of the proposed development having significant effects on the environment and therefore an Environmental Impact Assessment is not required.

1. Site Notice

Site notices were in place and in order on the 19/06/2019.

<u>2. Zoning</u>

The site is zoned Z9, 'To preserve, provide and improve recreational amenity and open space and green networks'.

It is located within the Zone of Archaeological Constraint for the Recorded Monument DU019-018 (Martello Tower), which is listed on the Record of Protected Structures, (Ref. 7860) and the Record of Monuments and Places (RMP) and is subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1994.

It is also adjacent to the Sea Wall which is also listed on the Record of Protected Structures, (Ref. 7861).

3. Site Description

The site is located on Sandymount Promenade at the junction of St. John's Road and Strand Road. The site includes the Martello Tower and the lands directly adjoining it.

4. Proposed Development

The proposed works relate to the improvement and provision of flood defences around the Martello Tower. The majority of the works which form part of the Sandymount Coastal Flood Defence Scheme Phase 1 were approved at the Dublin City Council meeting on Monday the 5th March 2018, (Reg. Ref. 4235/17). However, it was agreed that the flood defence works around the Martello Tower would form a separate Part 8 application.

The works adjacent to the Tower consist primarily of constructing a new flood defence wall around the sea side of the Martello Tower and installing 2 no. flood gates within the pedestrian entrances immediately north and south of the Martello Tower. The flood defence works will include;

- Construction of C70m of a new reinforced concrete wall 800mm high around the sea side of the Martello Tower
- Facing of the reinforced concrete wall with Leinster granite,
- Placement of Leinster granite coping
- Installation of an 850mm steel railing on top of a granite coping,
- Installation of 2 no. flood gates; one on the northern side of the tower and one to the south,
- The erection of a site compound within the car park opposite Gilford Road This would result in the temporary loss of approximately 30 car parking spaces for the duration of the works and also the erection of hoarding of approximately 2.5m in height around the compound.
- Removal and replacement of existing shrubbery where required,
- Closure of sections of the existing footpath access to be maintained to the promenade at all times,
- Reconstruction of the promenade and footpath (where required) to existing standard,

5. Site Planning History

4235/17 – Part 8 process for flood defence works along Strand Road between Gilford Avenue to the north and St. Alban's Park to the south to comprise of the following;

- raising the existing sea wall by up to 360 mm (which is a protected structure ref no. 7861) located at the back of footpath (on Strand Road) from south of the Martello Tower (Protected Structure - Ref. No. 7860) to the northern tip of the existing promenade;
- construction of a reinforced concrete wall (70 m in length and 800 mm in height) around the sea side of the Martello Tower;
- installation of flood defence barriers within 11 pedestrian and vehicular entrances along the entire length of the promenade;
- Repair and refurbishment work to the existing sea wall where required.

The works were approved by the City Council members on the 5th March 2018, apart from the works to the lands adjoining the Martello Tower.

The Area Committee as appropriate were informed of the initiation of the Part 8 planning process for the proposed development and the recommendation of the Planning Department at its meeting's on the 8th April 2019.

6. Observations

No third party observations were received within the statutory time frame.

7. Referrals

No responses to referrals were received within the statutory time frame.

8. Interdepartmental Reports

- Drainage Division There is no objection to the proposed development.
- **City Archaeologist's Report** It is noted that the proposed development is within the Zone of Archaeological Constraint for the Recorded Monument DU019-018 (Martello Tower), which is listed on the Record of Monuments and Places (RMP) and is subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1994.

The following condition is recommended;

- a. The proposer shall retain a suitably qualified licensed-archaeologist to advise regarding the archaeological implications of site clearance, demolition and/or construction methodology and to make appropriate recommendations for mitigation including detailed survey as necessary. The archaeologist shall provide an Archaeological Impact Assessment of the proposed development (including temporary and enabling works) to the Planning Authority prior to monitoring.
- a. The proposer shall allow for the resolution of archaeology (both on site and necessary post excavation) in the project budget and timetable.
- b. The proposer's archaeologist shall undertake licensed archaeological monitoring of all demolition and sub-surface works associated with the development including the breaking and removal of any floor slabs, levelling of ground etc.

- c. The archaeologist shall consult with and forward their Method Statement in advance of commencement to the Planning Authority.
- d. In the event of archaeological features being located in the course of the monitoring, the proposer shall facilitate the archaeologist in fully recording such features, including if necessary the archaeological excavation of such features. In the event of significant archaeological features on site, the archaeologist retained by the developer shall immediately contact the Planning Authority. The Planning Authority (in consultation with the City Archaeologist and the National Monuments Service, Department of Culture, Heritage and the Gaeltacht) shall determine the further archaeological resolution of the site.
- e. Two copies of a written report and a digital report (on compact disc) containing the results of the archaeological monitoring shall be forwarded on completion to the Planning Authority and National Monuments Service, Department Arts Heritage and Gaeltacht.
- f. Following submission of the final report to the Planning Authority, where archaeological material is shown to be present, the archaeological paper archive shall be compiled in accordance with the procedures detailed in the *Dublin City Archaeological Archive Guidelines* (2008 Dublin City Council) and lodged with the Dublin City Library and Archive, 138-44 Pearse Street, Dublin 2.

Reason: In the interest of preserving or preserving by record archaeological material likely to be damaged or destroyed in the course of development.

9. Planning Assessment

Development Plan Policy

It is the Policy of Dublin City Council:

Policy SI8: To mitigate against the effects of Floods and droughts subject to environmental assessments.

Policy SI9: To assist the Office of Public Works in developing catchment-bases Flood Risk Management Plans for rivers, coastlines and estuaries in the Dublin City area and have regard to their provisions/recommendations

Policy SI10: To have regard to the Guidelines for Planning Authorities on the planning System and Flood Risk Management, and Technical Appendices, November 2009, published by the Department of the Environment, Community, and Local Government as may be revised/updated when assessing planning applications and in the preparation of plans both statutory and non-statutory.

Policy SI11: To put in place adequate measures to protect the integrity of the existing Flood Defence Infrastructure in Dublin City Council's ownership and identified in the Strategic Flood Risk Assessment and to ensure that the new developments do not have the effect of reducing the effectiveness or integrity of any existing or new flood defence infrastructure and that flood defence infrastructure has regard also to nature conservation, open space and amenity issues

Policy SI12: To implement and comply fully with the recommendations of the Strategic Flood Risk Assessment prepared as part of the Dublin City Development Plan.

Policy SI14: To protect the Dublin City coastline from flooding as far as reasonably practicable, by implementing the recommendations of the Dublin Coastal Flood Protection Project and the Dublin Safer Project.

Policy SI15: To minimise the risk of pluvial (intense rainfall) flooding in the city as far as is reasonably practicable and not to allow any development which would increase this risk

Policy SI16: To minimise the flood risk in Dublin City from all other sources of flooding, including fluvial, reservoirs and dams and the piped water system

Policy SI17: To require an environmental assessment of all proposed flood protection or flood alleviation works

CC5: To address flood risk at strategic level through the process of strategic flood risk assessment, and through improvements to the city's flood defences (see appendix 11).

Appendix 11.4 Outlines the Flood Defence Infrastructure to be carried out in the Sandymount area including works to the promenade and existing sea walls.

Assessment

This is a Part 8 application for flood defence measures around the sea side of the Martello Tower.

In April 2003 the Dublin Coastal Flooding Protection Project was initiated in direct response to the extreme tidal and flood event that was experienced across Dublin City in February 2002. The project is primarily aimed at addressing the risk from tidal flooding around the coastline and within the tidal reaches of a number of the rivers. The project area encompasses the coastline from the Martello Tower to the north of Portmarnock, to the east pier at Howth Harbour, and the coastline from the Martello Tower on the South side of Howth Head to the Dublin City boundary at Merrion, including the Bull Island and the Dublin Port area.

The main aims of the project included a strategic examination of the risk from coastal flooding, identification of policies and strategies to combat and manage the risk and to identify medium to long term options to reduce and/or manage the risk. The Sandymount Coastal Flood Defence Scheme was designed in response to the findings of the Dublin Coastal Flooding Protection Project. Phase 1 of these works has been approved under a Part 8 process, (Ref. 4235/17). The subject Part 8 completes the proposed flood works to be provided under Phase 1.

Phase 2 works are currently in preliminary design stage with coastal defence options being reviewed.

The proposed flood defence works will include;

- Construction of C70m of a new reinforced concrete wall 800mm high around the sea side of the Martello Tower
- Facing of the reinforced concrete wall with Leinster granite,
- Placement of Leinster granite coping
- Installation of an 850mm steel railing on top of a granite coping,
- Installation of 2 no. flood gates; one on the northern side of the tower and one to the south,

- The erection of a site compound within the car park opposite Gilford Road This would result in the temporary loss of approximately 30 car parking spaces for the duration of the works and also the erection of hoarding of approximately 2.5m in height around the compound.
- Removal and replacement of existing shrubbery where required,
- Closure of sections of the existing footpath access to be maintained to the promenade at all times,
- Reconstruction of the promenade and footpath (where required) to existing standard,

The report from the Dublin City Council Flood Projects and Water Framework Division sets out the main environmental issues and mitigation measures that are recommended for the proposed planning scheme.

a) Biodiversity, Flora and Fauna

The proposed works are located in the vicinity of two European Sites designated for nature conservation, notably the South Dublin Bay Special Area of Conservation (SAC) and South Dublin Bay and River Tolka Estuary SPA.

South Dublin Bay SAC lies to the South of the River Liffey in County Dublin and extends from the South wall to the west Pier at Dun Laoghaire. It is an intertidal site with extensive areas of sand and mudflats and some areas of embryonic shifting dunes, and of considerable interest for a variety of habitats listed in Annex 1 and 11 of the Habitats Directive. The site is a fine example of a coastal system and the site is also of international important bird site.

The Intertidal sand and mudflats within Dublin Bay are optimal winter waterfowl habitat and the site is recognised as being of international importance. The South Dublin Bay and River Tolka Estuary SPA comprises a good portion of Dublin Bay, and included the intertidal area between the River Liffey and Dun Laoghaire and the estuary of the River Tolka to the north of the River Liffey as well as Booterstown Marsh. The site is a SPA of special conservation interest for bird species including Brent Goose, Oystercatcher, Ringed Plover, Knot, Dunlin, and other wading birds such as Common and Arctic tern.

It is noted from the report that standard pollution prevention measures and best practice construction will help to minimise potential degradation/disturbance of habitats used by wintering waterfowl.

b) Construction Phase Mitigation

Mitigation measures have been set out in the report which deals with the timing of the proposed works and the effects that would have on the ecology and wildlife.

Species occurring in internationally significant numbers such as Brent Goose, Oystercatcher, Ringed Plover, Knot, Sanderling, Dunlin, Bar-tailed Godwits, and Redshank are largely not present during the summer months.

It is noted from the submitted report that the proposed construction programme will be agreed with DCC, the Project Ecologist and the NPWS at commencement on site.

c) Visual Screening

Screening, if required, will be agreed with the NWPS, DCC and the Project Ecologist prior to commencement. Should screening be required it will comprise a 2.5m high timber or geotextile hoarding and will be provided on the sea wall along the length of the promenade.

d) Monitoring

The contractor will have a suitably qualified ecologist as part of the project team to ensure that construction activities are carried out in accordance with the best practice control measures and do not result in disturbance to birds on the mudflats.

After consultation with DCC Archaeology, Conservation & Heritage Section it was requested that suggested recommendations in the archaeological assessment carried out By Jean O'Dowd and Teresa Bolger of Rubicon Heritage be implemented. This recommends that all groundworks relating to the proposed development be monitored by a suitably qualified, licenced archaeologist. This includes enabling works for the removal of granite the granite wall and the construction of all new flood defences.

The NPWS should be kept informed of the planning timescale for the proposed development. At the end of the construction work a site inspection will be carried out by the ecologist and a report will be prepared for the NPWS.

e) Vegetation Clearance Restrictions

The roadside length of the promenade is lined with plated vegetation of discontinuous hedgerow of exotic origin and some small trees. This vegetation could potentially be used as breeding bird habitat during the main bird nesting season of 1st March to 31st August. Any unnecessary cutting of trees, bushes and hedgerows will be restricted during this period.

f) Appropriate Assessment Screening

As part of the proposed flood defence works an appropriate assessment screening has been carried out in compliance with the relevant European Commission and national guidelines. In this regard the potential impacts during the construction and operation of the proposed Sandymount Coastal Flood Defence Scheme (phase 1) have been considered in the context of the Natura 2000 sites, their Qualifying Interests and respective Conservation Objectives.

The Stage 1 Screening Report was carried out by Roughan O'Donovan Consulting Engineers and concluded that, 'Phase 1 of the Sandymount Coastal Flood Defence Scheme will not, either on its own or in combination with other plans and projects, have any adverse effect of the integrity of South Dublin Bay SAC, the South Dublin Bay and Tolka River Estuary SPA or any other Natura 2000 site'.

g) Human Beings

According to the report the proposed development will provide an overall positive impact on the community in Sandymount, including a reduced threat to human health and existing established land uses including dwellings, businesses, amenity facilities and their consequential financial losses caused by coastal flooding. The provision of the flood defences will protect approximately 1,000 properties from the estimated 200 year flood event and approximately 3000 properties will have a reduced flooding risk from the 1000 year flood event.

There will be some negative impacts associated with the proposed development, however these will be short term in nature and will be limited to the construction phase. The operational stage will have minimal if any adverse impact on human beings. The proposed wall height of 800mm was presented to the public at four Public Consultation workshops on Thursday 21st

July 2016 & Tuesday 5th December 2017 with no queries regarding the height of the flood defence wall around the Martello Tower.

h) Noise and Vibration

It is noted from the report that there will be no significant impacts from the Operational Phase of the proposed scheme. It is predicted that there are likely to be short term impacts in terms of noise and vibration during the works. Mitigation measures have been set out in the report to reduce these impacts including limiting hours during which site activities are likely to create high levels of noise and vibration, establishing channels of communication between the contractor the Local Authority and the residents, appointing a site representative, monitoring typical noise and vibration during the works and finally all site access roads will be maintained so as to mitigate the potential for vibration from lorries.

i) Air Quality

The current air quality for Sandymount is 'Good' based on the EPAs monitoring programme. It is noted that there will be no impacts from the operational phases, and it is predicted there will not be any significant air quality impacts. A dust minimisation plan will be incorporated into the contractors Construction Environmental Management Plan.

j) Architectural Heritage Assessment

As the proposed works are located within located within the Zone of Archaeological Constraint for the Recorded Monument DU019-018 (Martello Tower), which is listed on the Record of Protected Structures, (Ref. 7860) and the Record of Monuments and Places (RMP) and is subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1994, an Architectural Heritage Assessment was carried out by Lotts Architecture and Urbanism Ltd, and an Archaeological, Architectural and Cultural Heritage Impact Assessment was also prepared by Rubicon Heritage.

The Architectural Heritage Assessment states the following;

The Sandymount Martello Tower of 'Tower 16 South', is part of a chain of originally 28 defensive towers and batteries stretching from Bray to Balbriggan designed and constructed in 1804-1805 to protect the city of Dublin against the imminent threat of a French invasion during the Napoleonic Wars (1803-1815).....It should however be noted that, that as a building type which recurs in many places across the territories of the former British Empire, the tower is on interest to many people outside of Ireland.

The extension and attendant sunken area adjoining the Martello Tower are modern features which are of no heritage significance in their own right. The design of any new enclosing wall is nevertheless important, as it will form part of the setting of the Martello Tower.

The report also sets out the Methodology for the Proposed Works and recommends specific measures to be taken to mitigate against any impacts of the character and setting of the Martello Tower and the attendant lands.

k) Archaeology

The report from Rubicon Heritage assessed the impact of the proposed new fold defences on the Archaeological, Architectural and Cultural Heritage at the Martello Tower, Strand Road. The report sets out a number of mitigation measures to be undertaken during and after the works in order to protect the cultural heritage, in archaeological and conservation terms. The mitigation measures are as follows;

- 1. In order to preserve the architectural character and minimise impacts on the setting, it is recommended that the advice of the conservation architect and DCC Conservation Officer are adhered to.
- 1. All ground reduction, including (but not limited to) enabling works such as the removal of the foundations of the wall to be demolished should be subject to a programme of archaeological monitoring, under licence by a suitably qualified archaeologist.
- 2. If archaeological material is encountered then it will be investigated and fully recorded. However, if significant archaeological material is encountered then the City Archaeologist will be notified. Resolution of any significant material will be determined by the City Archaeologist in consultation with the National Monuments Service (DoCHG).
- 3. A written report will be prepared detailing the results of all archaeological work undertaken.

I) Public Consultations

Public consultation commenced on the 13th June 2016 when the South East Area Committee were briefed on the project by the Regional Projects & Flood Advisory Office. Following this 2,000 leaflets were dropped in the Sandymount area on Thursday 14th July 2016 and Friday 15th July 2016 inviting residents to attend three public consultation events in the Sandymount Hotel. Social media was also used to inform the public about the events.

Each of the public consultation sessions were well attended with over seventy people attending in total. Generally the proposals were received positively; however a large portion of attendees voiced opinions during each Q & A session.

On foot of the concerns raised the Surface Water Maintenance and Flood Risk Management Section have confirmed that gullies in the Sandymount area are routinely cleaned 2-3 times a year. They are also cleaned in advance of every predicted high tide/storm event. It was also proposed to permanently closer the pedestrian access directly south of the Martello Tower as part of the works. However as this was opposed by a number of residents, this access will not be closed.

A second public consultation was carried out in December 5th 2017 to present the flood defence scheme with amendments following on from the public's proposals from the consultation in July 2016. The flood defence proposal was received positively on this occasion with no objections voiced during the Q&A section.

Conclusion

After reviewing the submitted Part 8, it is considered that the main environmental concerns appear to have been addressed in the report. This proposal was subject to a number of inhouse pre-planning discussions with various departments. It is also noted from the report submitted with the Part 8 that the contractors proposed construction programme will be agreed in writing with DCC, the project ecologist and the NPWS at the commencement of the contract.

The main planning issues are the materials be used and techniques in raising the existing sea wall and in terms of visual amenity and impact on the character and setting of the protected structure. However the risk to property and people also has to be taken into consideration and with climate change, and more increased high tides, the raising of the flood walls is seen as a necessity, and the advantages would far outweigh any visual impacts of this wall.

The overriding purpose of the works which comprise a flood defence wall and flood gates is to provide an increased level of protection against coastal flooding along Strand Road and the adjoining inland streets. It is the opinion of the Planning Department that the flood barriers are completely necessary and that consideration has been given to the impact on the protected structure and the attendant lands.

The project is being substantially funded by the Office of Public Works.

Recommendation

Accordingly, it is recommended that a decision be made by Elected Members of the Council to proceed with the proposed development subject to the following conditions.

1.a. The proposer shall comply with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0 (available from www.dublincity.ie Forms and Downloads).

Reason: To ensure a satisfactory standard of development.

2. a. The proposer shall retain a suitably qualified licensed-archaeologist to advise regarding the archaeological implications of site clearance, demolition and/or construction methodology and to make appropriate recommendations for mitigation including detailed survey as necessary. The archaeologist shall provide an Archaeological Impact Assessment of the proposed development (including temporary and enabling works) to the Planning Authority prior to monitoring.

b. The proposer shall allow for the resolution of archaeology (both on site and necessary post excavation) in the project budget and timetable.

c. The proposer's archaeologist shall undertake licensed archaeological monitoring of all demolition and sub-surface works associated with the development including the breaking and removal of any floor slabs, levelling of ground etc.

d. The archaeologist shall consult with and forward their Method Statement in advance of commencement to the Planning Authority.

e. In the event of archaeological features being located in the course of the monitoring, the proposer shall facilitate the archaeologist in fully recording such features, including if necessary the archaeological excavation of such features. In the event of significant archaeological features on site, the archaeologist retained by the developer shall immediately contact the Planning Authority. The Planning Authority (in consultation with the City Archaeologist and the National Monuments Service, Department of Culture, Heritage and the Gaeltacht) shall determine the further archaeological resolution of the site.

f. Two copies of a written report and a digital report (on compact disc) containing the results of the archaeological monitoring shall be forwarded on completion to the Planning Authority and National Monuments Service, Department Arts Heritage and Gaeltacht.

g. Following submission of the final report to the Planning Authority, where archaeological material is shown to be present, the archaeological paper archive shall be compiled in accordance with the procedures detailed in the Dublin City Archaeological Archive Guidelines (2008 Dublin City Council) and lodged with the Dublin City Library and Archive, 138-44 Pearse Street, Dublin 2.

Reason: In the interest of preserving or preserving by record archaeological material likely to be damaged or destroyed in the course of development.

3. a) A conservation expert with proven and appropriate expertise shall be employed to design, manage, monitor and implement the works to the building and to ensure adequate protection of the retained and historic fabric during the works. In this regard, all permitted works shall be designed to cause minimum interference to the retained building and facades structure and/or fabric.

b) All works to the protected structure shall be carried out in accordance with best conservation practice and the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and Advice Series issued by the Department of the Environment, Heritage and Local Government. Any repair works shall retain the maximum amount of surviving historic fabric in situ. Items to be removed for repair off-site shall be recorded prior to removal, catalogued and numbered to allow for authentic re-instatement.

c) All existing original features, in the vicinity of the works (paving, ironwork and granite plinth) shall be protected during the course of the works.

d) In order to preserve the architectural character and minimise impacts on the setting, it is recommended that the advice of the conservation architect and DCC Conservation Officer are adhered to.

Reason: To protect the fabric, character and integrity of this protected structure and that the proposed repair works are carried out in accordance with best conservation practice with no unauthorised or unnecessary damage or loss of historic building fabric.

4. a. Details of the materials proposed in public areas should be in accordance with the document Construction Standards for Roads and Street Works in Dublin City Council and agreed in detail with the Road Maintenance Division.

Reason: To ensure a satisfactory standard of development.

Accordingly, it is recommended that a decision be made by Elected Members of the Council to proceed with the proposed development.

This report is submitted to the City Council pursuant to Section 138 of the Local Government Act, 2001 (as amended) and Section 179 of the Planning and Development Act, 2000 (as amended) subject to the provisions of Section 139 of the Local Government Act, 2001 (as amended).

Resolution:

"That Dublin City Council Notes Report No 224/201919 and hereby approves the contents therein."

Owen P. Keegan Chief Executive

Date: 21st August 2019

RECORD OF THIRD PARTIES & CONSULTEE DETAILS:

Chief Executives Rep No: 2242/19

App No: 3072/19

Location: Martello Tower, Strand Road, Sandymount, Dublin 4.

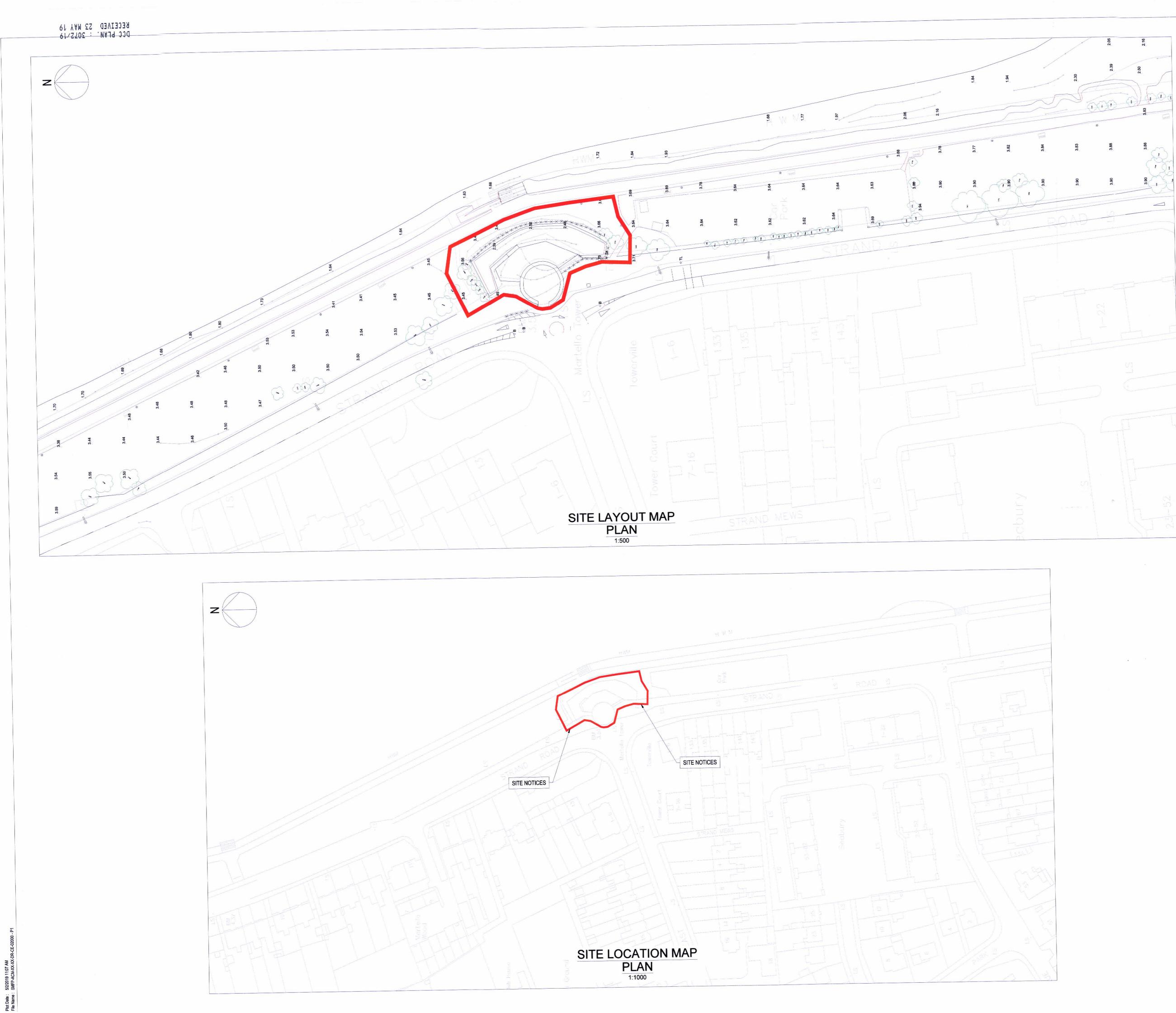
Consultees:

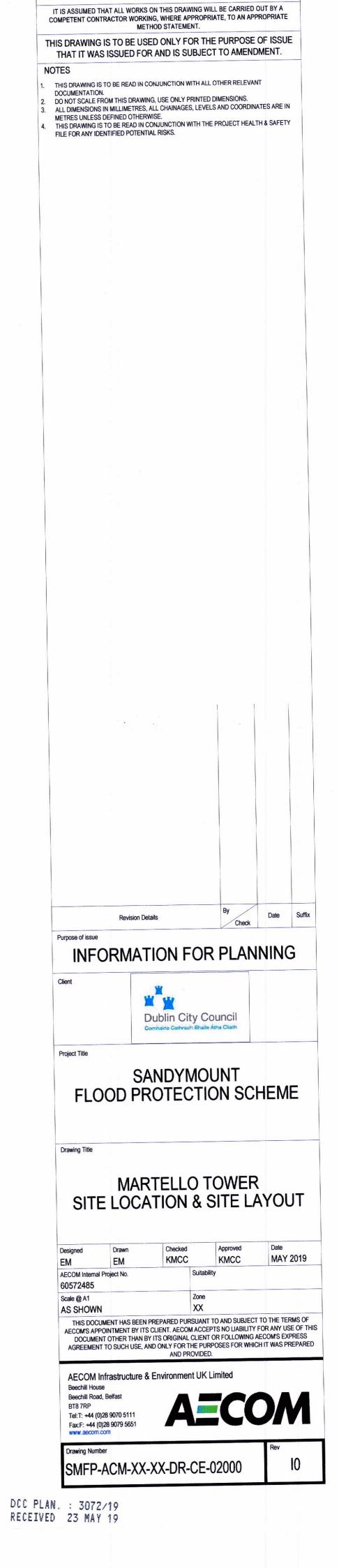
1: Irish Water, Colvill House, 24 - 26, Talbot Street, Dublin 1.

- 2: Heritage Council, Kilkenny City, Kilkenny.
- 3: An Taisce, Tailors Hall, Back Lane, Dublin 8.

4: Minister for Arts, Heritage, Regional, Rural and Gaeltacht Affairs, Development Applications Unit, Newtown Road, Wexford.

5: Conservation Section, Block 3, Floor 3, Civic Offices, Wood Quay, Dublin 8.





SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION BOX

