

# **DUBLIN CITY COUNCIL**

# SANTRY RIVER RESTORATION AND GREENWAY (SRRG) MASTERPLAN

# **Strategic Environmental Assessment Scoping Report**







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# SANTRY RIVER RESTORATION AND GREENWAY MASTERPLAN STRATEGIC ENVIRONMENTAL ASSESSMENT SCOPING REPORT

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#### 1 INTRODUCTION

#### 1.1 Background

The River Santry runs for approximately 13km, rising in Harristown, west of Dublin Airport and discharging into the North Bull Island Nature Reserve and Ramsar site. It traverses both Dublin City Council (DCC) and Fingal County Council (FCC). The river's catchment area is approximately 15.6km² in size. Land uses in the catchment include agriculture, residential, industrial / light industrial, warehousing and parks.

Dublin City Council (DCC), together with FCC and the National Transport Authority (NTA), is spearheading the formulation of the Santry River Restoration and Greenway (SRRG) Masterplan. A collaborative Masterplan is under development that sets out the framework, strategic objectives and optioneering of project proposals for the area.

This SEA Scoping Report has been prepared in accordance with EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, which is transposed into Irish legislation through the: (i) European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (S.I. 435/2004), as amended by S.I. 200 of 2011 (ii) Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. 436/2004), as amended by S.I. 200 and 201 of 2011 and through reference to relevant guidance documents as follows:

- Environmental Protection Agency (EPA). 2021. Good Practice Guidance on SEA Screening.
- Department of Housing, Local Government and Heritage. 2022. Strategic Environmental Assessment: Guidelines for Regional Assemblies and Planning Authorities.
- European Commission.2022. Guidance on the Implementation of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.

#### 1.2 Strategic Environmental Assessment

Strategic Environmental Assessment (SEA) is a process for evaluating, at the earliest appropriate stage, the environmental consequences of implementing plan/programme initiatives prepared by authorities at a national, regional or local level or which are prepared by an authority for adoption through legislative means. The purpose is to ensure that the environmental consequences of plans and programmes are assessed both during their preparation, and, prior to adoption. The SEA process also gives interested parties an opportunity to comment on the environmental effects of the proposed plan or programme and to be kept informed during the decision-making process.

As identified in the EPA SEA Screening Guidance (2021)¹, the SEA Directive (and transposed legislation) applies to plans and programmes that are (i) prepared or adopted at a national, regional or local level, and (ii) required by legislative, regulatory or administrative provisions. Mandatory SEA is required for those plans or programmes that are prepared for listed sectors² and set the framework for future development consent of projects listed in Annexes I and II to the EIA Directive or which require assessment under the EU Habitats Directive (92/43/EEC). SEA may also be required for other plans or programmes that are likely to have significant effects on the environment.

<sup>&</sup>lt;sup>2</sup> Agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use.



<sup>&</sup>lt;sup>1</sup> RPS & A&L Goodbody. 2021. Good Practice Guidance on SEA Screening. Environmental Protection Agency.

The Santry River Restoration and Greenway (SRRG) Masterplan was screened in for SEA<sup>3</sup>.

Broadly speaking, the SEA process is comprised of four stages as outlined in **Table 1.1** below.

Table 1.1: Stages in the Strategic Environmental Assessment (SEA) Process

Stage	Description	
Screening	Determines whether SEA is required for a Plan or Programme in consultation with the designated statutory consultees.	
Scoping	Determines the scope and level of detail for the SEA in consultation with the designated statutory consultees. As recommended in the DHGLH guidelines (2022), this report has been prepared as part of this stage.	
Environmental Assessment	This refers to a formal and transparent assessment of the likely significant effects on the environment due to implementation of a Plan / Programme including all reasonable alternatives. The output from this stage is an Environmental Report which is required to go on public display along with the draft Plan / Programme.	
SEA Statement	This summarises the process undertaken and identifies how environmental considerations and consultations have been integrated into the final Plan / Programme.	

#### 1.3 Appropriate Assessment

The EU Habitats Directive places strict legal obligations on Member States to ensure the protection, conservation and management of the habitats and species of conservation interest in all European Sites. The Habitats Directive has been transposed into Irish law by the Planning and Development Act 2000 (as amended) and the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended).

Article 6 of the Directive obliges Member States to undertake an 'appropriate assessment' (AA) for any plan or project which may have a likely significant effect on any European Site. The outcomes of such AAs fundamentally affect the decisions that may lawfully be made by competent national authorities in relation to the approval of plans or projects.

Articles 3 to 9 provide the legislative means to protect habitats and species of community interest through the establishment and conservation of an EU-wide network of sites known as Natura 2000. These are Special Areas of Conservation (SACs) designated under the Habitats Directive and Special Protection Areas (SPAs) designated under the Conservation of Wild Birds Directive (79/409/EEC as amended 2009/149/EC) (also known as "The Birds Directive").

Article 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans and projects likely to affect Natura 2000 sites. Article 6(3) establishes the requirement for Appropriate Assessment.

Article 6(3) states: "Any plan or project not directly connected with or necessary to the management of the Natura 2000 site but likely to have a significant effect thereon, either individually or in combination with other plans and projects, shall be subjected to appropriate assessment of its implications for the site in view of the site's conservation objectives. Taking into consideration the conclusions of the assessment, the implication for the site and subject to the provisions of paragraph 4, the competent national authorities

<sup>&</sup>lt;sup>3</sup> Screening determination published on 8<sup>th</sup> October 2024.



shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.

Article 6(4) states: "If, in spite of a negative assessment of the implications for the [Natura 2000] site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest [IROPI], including those of a social or economic nature, Member States shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted."

The Habitats Directive was transposed into Irish Law via several pieces of legislation which have now been consolidated into European Communities (Birds and Natural Habitats) Regulations 2011.

An Appropriate Assessment (AA) Screening Process for the SRRG Masterplan was carried out in parallel with the SEA screening. The AA Screening Report screened the Masterplan in for Appropriate Assessment.



#### 2 SANTRY RIVER RESTORATION AND GREENWAY MASTERPLAN

#### 2.1 Introduction

This chapter summarises the draft Santry River Restoration and Greenway (SRRG) Masterplan (hereafter referred to as the SRRG Masterplan, or the Masterplan) including the area covered by the Masterplan. The area and is divided into six sub-zones along and the Masterplan presents eight strategic objectives. This section also provides a summary overview of where the Masterplan sits in the overall policy hierarchy at an International and European, National and Regional level.

#### 2.2 The Santry River Restoration and Greenway Masterplan

As mentioned, the SRRG Masterplan is currently being formulated by DCC, in close collaboration with FCC and the NTA. This is a non-statutory land use plan that will attempt to (i) reduce flood risk at the Santry and improve its resilience; (ii) improve connectivity throughout the plan area, providing sustainable transportation through incorporation of a greenway (walking/cycling); (iii) enhance recreational and public use by improving social and recreational amenities in the catchment as identified through community/stakeholder engagement; and (iv) ecologically restore the river, and deliver good status under the Water Framework Directive (WFD).

An indicative area covered by the Masterplan is shown in



**Figure 2.1**. The area has been divided into the following six sub-zones:

- 1. The Coast to Raheny Village and the Train Line;
- 2. Raheny Village to Malahide Road;
- 3. Malahide Road to Clonshaugh Road;
- 4. Clonshaugh Road to M50;
- 5. M50 to R108; and
- 6. R108 to Silloge.

The SRRG Masterplan will provide a physical framework for the sustainable development of the Santry River restoration and the greenway infrastructure, describing the strategic intentions necessary to improve overall water quality and infrastructure. It will focus on assisting the DCC in complying with physicochemical, ecological and hydromorphological objectives of the Water Framework and Floods Directives; habitat, ecology and biodiversity objectives of the Birds and Habitats Directive; and social, recreational and amenity needs of the communities living within the river catchment, including a recreational greenway (cycle and pedestrian routes).

The Masterplan will be delivered through the achievement of the following eight objectives:

- **Objective 1**: To address river hydro-morphology, and specifically [through the following sub-objectives]:
  - To identify and resolve hydromorphological pressures impacting the River Santry;
  - To re-naturalise the river channel where feasible in accordance with the WFD;
  - To identify solutions to address flood risk in accordance with the Floods Directive;
  - o To prioritise the use of natural water retention measures; and
  - o To assess the impacts of climate change to the year 2100 on the river.
- **Objective 2**: To re-establish, where it has been lost, connectivity between the river and its riparian zone and natural flood zone.
- **Objective 3**: To improve the riparian corridor of the river and make provision, where required, for achieving objectives for biodiversity, ecology and habitat in accordance with the Birds and Habitats Directives, as well as creating a dynamic riverbed suitable for fish and invertebrates.
- **Objective 4**: To achieve good status under the WFD.
- **Objective 5**: To improve connectivity and create the Santry River Greenway, consisting of walkways and cycling routes for improved access to the river corridor and to allow commuters to reach their destination using sustainable transport/active travel modes.
- **Objective 6**: To identify and engage with all stakeholders.
- **Objective 7**: To enhance the Santry's ecosystem services and reduce costs associated with damages associated with current conditions (including from flooding, anti-social behaviour, etc.).
- **Objective 8**: To preserve, protect and promote the archaeological and heritage sites throughout the catchment.

The formulation of the SRRG Masterplan will identify strategic measures to achieve the eight Masterplan objectives as well as targets to reach within specified timeframes. Masterplan indicators will be directly related to the Masterplan's strategic measures.



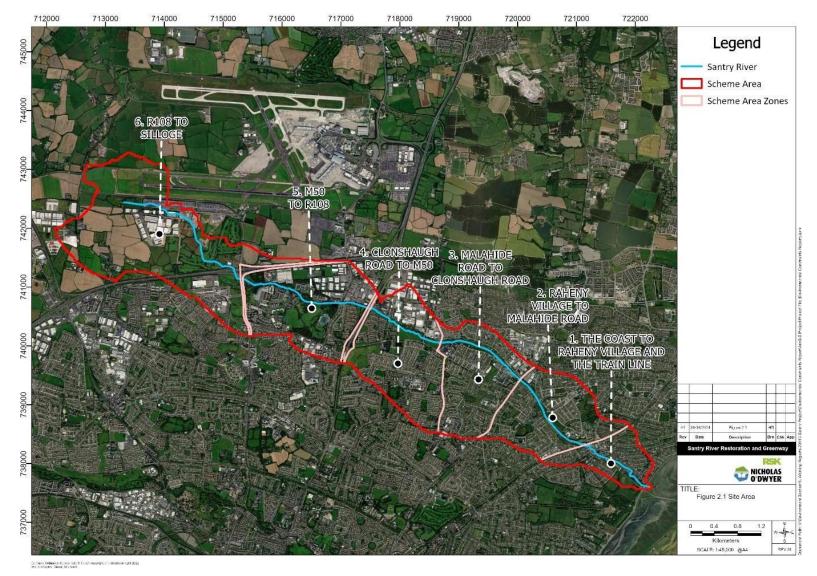


Figure 2.1: Site area



# 3 POLICY CONTEXT - RELATION OF THE SANTRY RIVER RESTORATION AND GREENWAY MASTERPLAN TO OTHER STRATEGIES & PLANS

As described in the DHLGH (2022) guidelines, during scoping, the Plan's relationship with other plans/programmes should be identified (both vertically i.e., within the hierarchy of land-use plans, and horizontally, i.e., other sectoral plans/programmes operating in the same area).

**Appendix 1** provides a list of the policies, plans, and programmes relevant to the SRRG Masterplan, which have been analysed. The analysis has been subdivided into the following main categories:

- (i) **International Commitments**: this category covers the international environment and sustainability policy framework within which Ireland must operate. It includes a selection of global commitments, such as those arising from the UN Sustainable Development Goals (SDGs) under the 2030 Sustainable Development Agenda, UN Framework Convention on Climate Change (UNFCCC) and Kummin-Montreal Global Biodiversity Framework under the Convention on Biodiversity.
- (ii) **EU requirements**: Relevant EU Directives and communications have been included and summarised.
- (iii) **National Environmental & Planning Documents** including Project Ireland 2040 Our Plan, the National Planning Framework (NPF), the National Development Plan, and the Sustainable Development Goals National Implementation Plan. The review provided herein summarises the key issues in relation to the scope of the Masterplan; further information can be obtained from the original documents.
- (iv) **National Sectoral Policies and Strategies**: this section covers highest-level policy and strategy documents published by the Government, such as the National Strategic Plan. Rather than summarise entire documents this review seeks to emphasise the key sustainability objectives and priorities.
- (v) **Regional & Sub-regional Plans**: this covers relevant regional and sub-regional plans pertaining to Dublin and the Santry area, specifically including the Eastern and Middle Regional Assembly Regional Spatial and Economic Strategy (RSES 2019-2031), the Dublin City Development Plan (2022-2028), and the Fingal County Council Development Plan (2023-2029).



#### 4 ENVIRONMENTAL BASELINE

A good understanding of the environment of the areas covered by the SEA is needed for a sound assessment. It is therefore necessary to establish the environmental baseline relevant to the plan or programme being proposed. This provides a snapshot of the existing state of the environment and a description of the likely future trends (based on past trends) in the absence of the plan or programme.

The Environmental Report will contain a detailed description of the environmental baseline data for the Masterplan area. The baseline data will be presented through maps, graphs and diagrams with supporting text, as relevant. The current state of the environment will be described using the most up to date and relevant information available. Existing environmental and sustainability data will be collected from a wide range of sources (see **Table 4.1** for a list of key baseline information and sources proposed to be used in the preparation of the Environmental Report). The list is not exhaustive and may be modified in the Environmental Report and will also depend on the availability of data. Should updated environmental information of significance become available, this information will be incorporated into the description of the current state of the environment. If data gaps exist these will be clearly stated along with details on whether it will be feasible to address these data gaps during the environmental assessment process.

Environmental parameters considered are in line with Annex I of the SEA Directive.

Table 4.1: Summary of Proposed Environmental Baseline Data and Sources

SEA Topic	Proposed Scope of Baseline Data	Data Sources
Biodiversity, Flora and Fauna	Information pertaining to designated sites and their qualifying features of interests.  Data regarding protected habitats and species in the general area.  Current threats to biodiversity including invasive species	Aerial photography National Parks and Wildlife Service (NPWS) Environmental Protection Agency (EPA) portal National Biodiversity Data Centre (NBDC) Inland Fisheries Ireland (IFI) Bat Conservation Ireland BirdWatch Ireland Tailte Éireann GeoHive Map Viewer
		Local authority data – FCC and DCC
Population & Human Health	Population density and distribution, perceived health	Central Statistics Office (CSO) database Local authority data – FCC & DCC Health Service Executive Pobal Tailte Éireann GeoHive Map Viewer
Geology, Soils & Land-use	Geological and soil features including bedrock, aquifers, soil and subsoil type /	Geological Survey of Ireland (GSI) Office of Public Works (OPW)



SEA Topic	Proposed Scope of Baseline Data	Data Sources
	vulnerability, geological heritage sites and soil contamination. Land-use designations within the Scheme area	EPA Portal County Development Plans Corine landcover and land-use database Teagasc Soil information
Water	Location & status of waterbodies.  Flood risk and management.  Water quality and usage.	Water Framework Directive (WFD) data EPA database / reports Integrated Water Quality Reports National Catchment Flood Risk Assessment and Management Programme (CFRAM) Catchments.ie OPW (floodinfo.ie) IFI Local authority data - FCC & DCC
Air, Noise and Vibration	Air quality data.  Noise and vibration data and information.	EPA Portal/database Strategic Noise Maps & Action Plans Local authority database- FCC & DCC
Climatic factors	General climatic information and trends. Carbon emissions from construction activities	National and International reports on climate change EPA Greenhouse Gas Emission RSES
Material Assets, Infrastructure	Number and type of infrastructure (Transport, telecommunications, energy)  Resources and waste	Transport Infrastructure Ireland (TII) EPA & WFD data EPA Local authority data - FCC & DCC
Cultural, Archaeological & Architectural Heritage	Location and status of protected sites, monuments	Local authority data – FCC & DCC  National Inventory of Architectural Heritage  National Monuments Service Historic Environment Viewer for Archaeological and Architectural Heritage  The Heritage Council



SEA Topic	Proposed Scope of Baseline Data	Data Sources
Landscape & Visual Amenity	Landscape character areas and sensitive landscape areas.	Local authority data – FCC & DCC  Landscape Conservation Areas  Landscape Character Areas  Sensitive Landscapes



#### 5 ENVIRONMENTAL ASSESSMENT

#### 5.1 SEA Objectives

In line with the Department of Housing Local Government and Heritage's (DHLGH) 2022 SEA Guidelines for Regional Assemblies and Planning Authorities<sup>4</sup>, relevant international, EU, national and regional strategic environmental protection objectives that were identified also as part of the analysis of other plans and programmes (see **Appendix 1**) were taken into consideration in the context of the environmental assessment. To this end, strategic environmental objectives, specific to the context of the SRRG Masterplan were identified upon which to base the assessment. Indicators were also identified to monitor the performance of the Masterplan against the SEA objectives. The SEA objectives are distinct from Masterplan objectives and should influence the Masterplan objectives; the two may even overlap.

**Table 5.1** presents draft environmental objectives and indicators proposed for the SRRG Masterplan. These environmental objectives and indicators emerged from (i) baseline information to be collated; and (ii) an integrated review of other policies and plans that can have a bearing on the Masterplan objectives.

As mentioned, as the development of the (draft) Masterplan progresses and project options are developed, objectives and indicators may change or be further adapted in light of the overall Masterplan and latest requirements at Environmental Report stage.

<sup>&</sup>lt;sup>4</sup> Department of Housing, Local government and Heritage. 2022. *Strategic Environmental Assessment: Guidelines for Regional Assemblies and Planning Authorities*. Government of Ireland.



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**Table 5.1: Environmental Objectives and Indicators** 

Environmental Factor	Draft Strategic Environmental Objectives	Draft Indicators
Biodiversity, Flora and Fauna	To enhance biodiversity at the Santry River To control/eradicate invasive alien species To improve connectivity and avoid habitat fragmentation To restore and create habitats of conservation significance To include green / blue infrastructure provisions	Extent of habitats of conservation significance Species richness Populations of species of conservation significance Invasive alien species populations Extent of riparian habitat Extent of hedgerows / verges Number of features introduced to create habitat (e.g., nesting boxes for birds, ledges and artificial holts for otters, etc.) Extent of grassland managed as mosaic habitats Number of barriers causing fragmentation, e.g., to otter mobility, removed Number/extent of green/blue infrastructure included
Population and Human Health	To improve amenity of the Santry River and its environs  To enhance public use of the Santry River for recreational activities  To improve connectivity and encourage cycling along designated greenway  To encourage community involvement in the protection and maintenance of the Santry River and its public environs  To protect against flooding	Number of community events (e.g., educational visits, clean ups, environmental and cultural festivals, cultural tours, etc) held annually within the Santry Scheme area  Number / extent of cycling and walking routes  Extent of areas opened up for public use  Extent of areas protected from flooding
Soil & Geology	To safeguard sensitive soil, resources and geological heritage sites against pollution and degradation, including erosion and soil sealing	Number of actions, such as planting of specific habitat, that also target / will result in improvements to soil quality and contribute to soil conservation.  Soil extent Soil quality



Environmental Factor	Draft Strategic Environmental Objectives	Draft Indicators
Water Quality & Flooding	To contribute towards the maintenance and improvement of the quality and status of surface waters in line with the Water Framework Directive requirements.  To contribute towards maintaining and improving the chemical and quantitative status of groundwaters in line with the Water Framework Directive requirements.  To contribute towards compliance with the provisions of the Flood Directive	Biological status (Q-values) Water chemistry Extent of river restored to more natural conditions Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC Compliance of relevant lower tier assessments and decision making with the Flood Risk Management Guidelines
Material Assets	To contribute towards the protection of built/amenity assets and infrastructure  To reduce waste production through the circular economy  To promote alternative modes of transport  To promote sustainable drainage systems	Extent of built/amenity assets and infrastructure protected from flooding Waste generated and managed by the Scheme Use of greenway Use of sustainable drainage systems
Air Quality	To avoid, prevent or reduce emissions to air	Air quality indicators: NO <sub>2</sub> concentrations Particulate matter concentrations
Climatic Factors and climate change	To integrate sustainable design solutions that contribute to climate change adaptation (and mitigation as possible).  To promote development resilient to the effects of climate change  To reduce GHG emissions	Extent of structures/sites with enhanced flood protection Extent of river restored to more natural conditions GHG emissions trends over time
Landscape	To protect and maintain the special qualities of the landscape	Landscape condition <sup>5</sup> in line with the Landscape Character Assessment of the Santry River, 2023 Environmental Impact Assessment findings on landscape assessment, as relevant

 $<sup>^{\</sup>rm 5}$  In line with the Landscape Character Assessment of the Santry River, 2023



Environmental Factor	Draft Strategic Environmental Objectives	Draft Indicators
Cultural Heritage	To contribute towards the protection of archaeological heritage (including entries to the Record of Monuments and Places) and its context	Number of measures targeting the improvement of the cultural landscape
	To contribute towards the protection of architectural heritage (including entries to the Record of Protected Structures, entries to the National Inventory of Architectural Heritage and Architectural Conservation Areas) and its context	



#### 5.2 Likely Significant Effects

As described in the 2022 DHLGH SEA Guidelines, significance may be described in terms of the type and scale of development envisaged by the plan and the sensitivity of the receiving environment, *i.e.*, the larger the scale of impacts and the more sensitive the receiving environment, the more significant the effects are likely to be. Various methods can be used to determine significance including expert judgements, the use of thresholds, reference to legislation, and consultation with stakeholders. It is expected that, during the SEA process, all these techniques will be used, as relevant, during the assessment. Consultation will help to ensure that all factors are considered.

Annex II of the 2022 DHLGH SEA Guidelines (and Schedule 1 of the Regulations) identifies criteria for determining likely significance of effects. The assessment of significance is based on the probability of the impact occurring, on the scale of the impact, its duration, reversibility, whether it has transboundary impacts, and whether the impact is uncertain.

The SEA objectives identified in **Table 5.1** will be used to assess the SRRG Masterplan initiatives in accordance with the significance criteria as set out in the Environmental Report. **Table 5.2** describes the assessment framework. The results of the assessment will be presented in the format indicated in **Table 5.3**.

Potential secondary, cumulative or synergistic impacts will also be identified as relevant.

Table 5.2: Assessment legend

Impact character	Symbol	Description of Impact
Probability	VP	Impact very likely to occur
	Р	Impact likely to occur
Scale	++	Large positive impact
	+	Positive impact
	0	No impact
	-	Negative impact
		Large negative impact
Direct / Indirect	I	Indirect impact
	D	Direct impact
Frequency / duration	LT	Long term
	ST	Short term
Transboundary dimension	TR	Possible transboundary effect
Uncertainty	?	Impact uncertain



Table 5.3: Example CAP Strategic Plan Assessment framework and format for Environmental Report

Relevant		Criteria		Significance	9	
SEA Aspect	SEA Objectives	How will this measure	Comment	Symbols	Summary description	Mitigation
Measure/In	itiative:					
Biodiversity, Flora & Fauna	To enhance biodiversity at the Santry River  To control/eradicate invasive alien species  To improve connectivity and avoid habitat fragmentation  To restore and create habitats of conservation significance  To include green / blue infrastructure provisions	<ul> <li>Affect biodiversity at Santry River?</li> <li>Affect protected species and habitats?</li> <li>Affect the introduction of nonindigenous / alien invasive species into the natural environment?</li> <li>Affect the creation / maintenance of natural corridors and stepping stones?</li> <li>Affect the inclusion of green/blue infrastructure provisions?</li> </ul>	What is the potential impact?	Impact assessment in accordance with the criteria listed in <b>Table 5.2</b>	Justification of the impact assessment	Description of mitigation measures, if these are necessary



#### 5.2.2 Cumulative & Synergistic Effects

This stage of the process involves an assessment of the cumulative and synergistic effects of all proposed objectives in the SRRG Masterplan on the relevant environmental issues, objectives, and indicators. Cumulative effects are effects that result from incremental changes caused by other past, present, or reasonably foreseeable actions together with the proposal. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time.

Synergistic effects interact to produce a total effect that is greater than the sum of the individual effects. Synergistic effects often happen as habitats or human communities begin to reach carrying capacity and/or non-renewable resources are depleted unsustainably.

The cumulative and synergistic impact assessment will be based on the information generated by the preceding assessments (described above) of the individual priorities. Any identified cumulative and synergistic effects will be summarised and used as recommendations for final adjustments to the programming document.

#### 5.3 Alternatives

The SEA Directive requires that an assessment must identify the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives considering the objectives and the geographical scope of the plan or programme.

During the development of the SRRG Masterplan, feasible alternatives considered by the DCC, FCC and TA will also be assessed from an environmental viewpoint against the SEA objectives identified in **Table 5.1**.

#### 5.4 Mitigation

Mitigation measures will be recommended where an option arising from the Masterplan has the potential to result in negative environmental impacts. The mitigation measures will aim to prevent, reduce and as comprehensively as possible offset any significant adverse effects on the environment due to implementation of the SRRG Masterplan.

#### 5.5 Monitoring

The SRRG Masterplan's implementation will be measured with respect to the SEA objectives, by measuring (monitoring) the significant effects of the Masterplan on the environment.

The SEA will assess the monitoring arrangements proposed for the SRRG Masterplan and may recommend incorporation of new indicators based on the relevant environmental issues, objectives, and indicators for the programming document.

It is noted that the correlation between indicators for monitoring and the SRRG Masterplan objectives may be constrained because indicators may be affected by other initiatives, including private sector initiatives, other plans and programmes, and legislative measures that are outside the scope of the SRRG Masterplan.



#### **6 THE ENVIRONMENTAL REPORT**

The Environmental Report considers all the following in accordance with the requirements of the SEA Directive:

- Population and Human Health
- Biodiversity
- Soil & Land Use
- Water
- Air Quality and Climate Change
- Material Assets
- Cultural Heritage
- Landscape

**Table 6.1** below summarises the content of the Environmental Report. In the first instance the Environmental Report details the current state of the environment within each of the subheadings set out above, and interrelationships between each of the environmental topics. The Environmental Report examines significant environmental pressures that may affect each of the environmental topics and the current (Baseline) state of the environment.

**Table 6.1: Environmental Report Framework** 

Section	Description
Non-Technical Summary	A summary of the Environmental Report, its main points and conclusions.
Introduction	Provides a description of the type of Plan involved and a summary of its key aims and objectives. The purpose of the SEA process, SEA requirements, and its benefits and how the Masterplan and Environmental Report have progressed are outlined.
SEA Methodology	Highlights the steps taken in preparation of the SEA, the methods used, limitations and stakeholder consultation.
Baseline	A description of the current environment of the plan area is given, highlighting any existing environmental problems in the plan area. This exercise results in a comprehensive baseline against which the likely effects of implementing the Masterplan can be examined.
SEA Framework -	Strategic Environmental Objectives and indicators Assessment of significance.
Alternatives	An assessment of proposed development alternatives in the Plan area are considered at this stage. Identification of preferred alternative with accompanying justification.
Assessment	The proposed Masterplan policies and objectives are examined in terms of their potential effects on the various Environmental parameters in the context of the Strategic Environmental Objectives.



#### Strategic Environmental Assessment Scoping Report

Section	Description
Mitigation Measures	Should potentially significant effects be discovered, measures to prevent, reduce or offset these effects are proposed and integrated into the Masterplan.
Monitoring	Proposals for monitoring the significant effects of the Masterplan on the environment are put forward. A number of indicators of change and targets are identified, and existing monitoring arrangements are utilised.
Appendices	As necessary.



#### 7 CONSULTATION

#### 7.1 Pre-Assessment Consultations

From commencement of the study the Steering Group initiated a series of Public Information days and evenings to inform the public in the Santry Catchment of the project and gather their experiences and views on the scheme through the process. **Table 7.1** lists the events held, the date and location. Generally, the aim was to target three main areas of the catchment:

- Upper catchment in Santry (Northwood)
- Middle catchment in Coolock
- Lower catchment in Raheny

Initially, in Autumn 2022, as the Scheme commenced the public were asked for their ideas, concerns and feedback on the intentions of the Scheme using a Site workbook to record ideas.

In Autumn 2023, as emerging options were formed, further sessions were held to gain feedback. In Autumn 2024, three evenings were allocated to sharing the ideas of the emerging preferred option.

Details on these consultations including presentations and feedback received are contained in Consultation Reports and material shared is contained on the Scheme website.

**Table 7.1: Community consultation events** 

Date	Time	Location
Thursday 8th September 2022	10am	Raheny, The Coast to Malahide Road
Thursday 8th September 2022	2:30pm	Malahide Road to Clonshaugh Road
Friday 9th September 2022	10am	Clonshaugh Road to M50
Friday 9th September 2022	2:30pm	M5 to Sillogue
Tuesday 18th October 2022	7:30pm to 9:00pm	Crowne Plaza Hotel, Northwood Park, Santry Demesne, Dublin, D09 KN66
Wednesday 19th October 2022	7:30pm to 9:00pm	Northside Civic Centre, Conference Room 1, Ground Floor, D17 K462
Thursday 20th October 2022	7:30pm to 9:00pm	Grange Woodbine Club House ,Raheny Road, Dublin, D05 E061
Tuesday 19th September 2023	7:30pm to 9:00pm	Crowne Plaza Hotel, Northwood Park, Santry Demesne, Dublin, D09 KN66
Wednesday 20th September 2023	7:30pm to 9:00pm	St John the Evangelist Church, Tonlegee Rd, Donaghmede, Dublin 5



Date	Time	Location
Thursday 21st September 2023	7:30pm to 9:00pm	Grange Woodbine Club House, Raheny Road, Dublin, D05 E061
Wednesday 11th September 2024	7:30pm to 9:00pm	St John the Evangelist Church, Tonlegee Rd, Donaghmede, Dublin 5, D05 P0A8
Thursday 12th September 2024	7:30pm to 9:00pm	Crowne Plaza Dublin Airport, Northwood Avenue, Northwood, Dublin 9
Friday 13th September 2024	7:30pm to 9:00pm	Manor House Girls Secondary School, Watermill Road, Dublin 5, D05R827

In addition to the consultation events, DCC held several school events to gain the opinion of the younger cohort and issued workbooks and feedback sheets to understand their needs and wants. **Table 7.2** lists the events held at schools.

Table 7.2: School consultation events

Date	Time	Location
Wednesday 19th October 2022	Morning	Coláiste Dhúlaigh, Coolock - Secondary
Wednesday 19th October 2022	Morning	St. Paul's College , Raheny - Secondary
Wednesday 19th October 2022	Afternoon	Springdale N.S - National School
Wednesday 19th October 2022	Afternoon	Coláiste Dhúlaigh CDCFE - College of Further Education
Thursday 20th October 2022	Morning	St. Eithne's Girls NS - National School
Thursday 20th October 2022	Morning	Manor House School, Raheny - Secondary
Thursday 20th October 2022	Afternoon	Gaelscoil Cholmcille - National School
Thursday 20th October 2022	Morning	Scoil Ide - National School

#### **7.2 SEA Statutory Consultations**

Under Article 6 of the SEA Directive and Article 11 of SI 435 of 2004, the competent authority, preparing the Plan or programme is required to consult with specific "environmental authorities" (statutory consultees) throughout the SEA process. In line with S.I. 200 of 2011, these statutory consultees are established as being the:

- Environmental Protection Agency (EPA)
- Department of Housing, Local Government and Heritage (DHLGH)
- Department of Agriculture, Food and the Marine (DAFM)



Department of Department of Environment, Climate and Communications (DECC)

Non-statutory stakeholders relevant to and included in the SRRG Masterplan consultation process include:

- An Taisce
- Department of Transport, Tourism and Sport (DTTAS)
- Dublin City Council (DCC)
- Fingal City Council
- Inland Fisheries Ireland (IFI)
- National Transport Authority (NTA)
- Office of Public Works (OPW) including the Eastern CFRAM Project
- Bird Watch Ireland
- Local Residents Associations
- Local Amenity Groups
- Local Business Community
- The Heritage Council
- Transport Infrastructure Ireland (TII)
- Local Authorities Waters Programme Office

This SEA Scoping Report will be available for inspection on the DCC website and feedback will be welcomed from all interested parties including members of the public. Furthermore, this SEA Scoping Report will be sent to each of the consultees and will be invited to make submissions. All comments and submissions received will be recorded, reviewed and applied to the SEA process where relevant. This will continue up until publication of the Environmental Report.

The draft Environmental Report will also be sent to the consultees. The draft Environmental Report, and draft Masterplan will be issued for public consultation thereby giving stakeholders the opportunity to comment on the Plan and Environmental Report. All comments received will be recorded, reviewed, and applied where relevant.



#### **8 NEXT STEPS**

The proposed timeline for the SEA process is outlined in **Table 8.1** below.

**Table 8.1: Timeline for SEA Process** 

Action	Timeline
SEA Screening Report	Completed – July 2024
SEA Scoping Report	Completed – November 2024
SEA Scoping Consultation Phase	November/December 2024
SEA Scoping Report, revised as required	December 2024
SEA Environmental Report and NIS	December 2024
SEA Environmental Report Public Consultation	December 2024 – January 2025
SEA Environmental Report, revised as required	January 2025



### **APPENDIX 1**

## **Analysis of Related Plans, Programmes & Legislation**



Plan, Programme, Legislation	Description	Implications for the Santry River Restoration and Greenway Masterplan
1. International Comm	itments	
UN 2030 Sustainable Development Agenda	The Agenda identifies 17 Sustainable Development Goals and 169 targets which build on the Millenium Development Goals (MDGs) and aim to achieve what was not by the MDGs. The Goals seek to realise the human rights of all and to achieve gender equality and the empowerment of all women and girls. They are integrated and balance the three pillars, economic, social and environmental, of sustainable development.	Ireland, as one of the 191 UN Member States, must display a commitment to implement the global sustainable development goals. Specific SDGs and Targets that are relevant to the SRRG include: SG3 Good Health and Well Being, SDG 9 Industry, Innovation and Infrastructure, 11 Sustainable Cities and Communities, SDG 12 Responsible Consumption and Production, SDG 13 Climate Action and SDG 14 Life on Land.
UN Framework Convention on Climate Change (1992)	The ultimate objective of this Convention, and any related legal instruments that the Conference of the Parties may adopt, is to achieve stabilisation of greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system. Such a level should be achieved within a timeframe sufficient to allow ecosystems to adapt naturally to climate change, to ensure that food production is not threatened, and to enable economic development to proceed in a sustainable manner. Ireland is an Annex 1 country, which means that it has to meet quantified targets for a reduction in greenhouse emissions. The Kyoto Protocol of 1997 and the Paris Agreement of 2016 shape the responsibilities of the UNFCCC Secretariat in its current state. A key responsibility of the UNFCCC is the organisation of the Conference of Parties (COP) which are hosted annually.	The SRRG Masterplan should be in line with Ireland's efforts to combat and adapt to climate change and encourage efforts to reduce emissions. The SEA proposes objectives and indicators related to climate change.
Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979)	Ireland is a party to the Bern Convention. The Convention aims to ensure conservation of wild flora and fauna species and their habitats. Special attention is given to endangered and vulnerable species, including endangered and vulnerable migratory species specified in appendices. The Parties to the Convention must undertake to take all appropriate measures	Objective 3 of the SRRG Masterplan is directly in line with the spirit of this Convention. Relevant Strategic Environmental Objectives have also been developed to further enhance horizontal integration across the Masterplan objectives.



Plan, Programme, Legislation	Description	Implications for the Santry River Restoration and Greenway Masterplan
	to ensure the conservation of the habitats of the wild flora and fauna species. Such measures should be included in the Parties' planning and development policies and pollution control, with particular attention to the conservation of wild flora and fauna. They should also undertake to promote education and disseminate general information concerning the need to conserve species of wild flora and fauna and their habitats.	
Convention on Biological Diversity, 1992	The Convention on Biological Diversity, also known as the Rio Convention, was enacted in 1992. Its objective is to "conserve the maximum possible biological diversity for the benefit of present and future generations and for its intrinsic value". This pact among the vast majority of the world's governments sets out commitments for maintaining the world's ecological underpinnings while maintaining economic development. The Convention establishes three main goals: the conservation of biological diversity, the sustainable use of its components, and the fair and equitable sharing of the benefits from the use of genetic resources. Relevant aspects of the Convention are the emphasis on the sustainable use of components of biological diversity, the requirement for EIA, and the inclusion of biodiversity issues.  A direct result of the Rio Convention was the concept of Agenda 21 – a global partnership for sustainable development. Agenda 21 addresses today's pressing problems aiming to prepare the world to meet its challenges. It reflects a global consensus and political commitment at the highest level on development and environment cooperation. Its successful implementation is first and foremost the responsibility of Governments, but the broadest public participation and the active involvement of the non-governmental organisations and other groups	Tying in also with the SDGs, the sustainable conservation of resources is particularly relevant to the SRRG Masterplan and will be assessed in the Environmental Report.



Plan, Programme, Legislation	Description	Implications for the Santry River Restoration and Greenway Masterplan
	should also be encouraged. National strategies, plans, policies, and processes are crucial in achieving this (UNEP, 2005 <sup>6</sup> ).	
	Agenda 21 has four sections:	
	<ul> <li>Social and economic dimensions;</li> </ul>	
	<ul> <li>Conservation and management of resources for development;</li> </ul>	
	<ul> <li>Strengthening the role of major groups; and</li> </ul>	
	Means of implementation.	
Kumming-Montreal Global Biodiversity Framework, 2022	Following four years of development negotiations, Parties to the Convention on Biological Diversity (CBD) adopted the Kummin-Montreal Global Biodiversity Framework on 19 <sup>th</sup> December 2022, replacing the CBD's Strategic Plan for Biodiversity 2011-2020 and its Aichi Targets. The framework cites 4 global 2050 goals and 23 global 2030 targets. These are divided into four broad topics: biodiversity conservation and restoration; nature's contribution to people; access and benefit sharing and tools; and solutions for mainstreaming and implementation. The global biodiversity action agenda for the next decade includes the following:  • halt extinction of known threatened species and significantly reduce extinction risk (Goal A)  • ensure at least 30 per cent of areas of degraded terrestrial, inland water, and coastal and marine ecosystems are under effective restoration (Target 2)  • ensure at least 30 per cent of terrestrial, inland water, and of coastal and marine areas are effectively	As reported in Social Justice for Ireland (2023), the EPA estimates that the economic value of Ireland's ecosystem services is around €2.6 billion. However, the rate of habitat degradation and loss of biodiversity is accelerating. The SRRG Masterplan objectives can actively contribute to the achievement of targets and further assessment and integration through the SEA will help enhance benefits.

<sup>&</sup>lt;sup>6</sup> UNEP Earthwatch website, 2005. Accessed at <a href="http://earthwatch.grid.unep.ch/agenda21/">http://earthwatch.grid.unep.ch/agenda21/</a> in March 2005.

 $<sup>^{7}</sup>$  Social Justice Ireland. 2023. Time for Action on Biodiversity Loss.



Plan, Programme, Legislation	Description	Implications for the Santry River Restoration and Greenway Masterplan
	<ul> <li>conserved and managed (Target 3)</li> <li>reduce the rates of introduction and establishment of other known or potential invasive alien species by at least 50 per cent, by 2030 (Target 6)</li> <li>reduce pollution risks and impacts of pollution from all sources to prevent harmful impacts on biodiversity (Target 7)</li> <li>minimise the impact of climate change and ocean acidification on biodiversity (Target 8)</li> <li>mainstream biodiversity into decision-making across government and business (Targets 14 and 15)</li> </ul>	
2. EU requirements		
The European Green Deal (a Commission priority 2019-2024): Striving to be the first climate -neutral continent	In order to combat climate change and environmental degradation, the EU aims to transform the EU into a modern, resource-efficient and competitive economy, aiming for:  • No net emissions by 2050.	The SRRG Masterplan objectives and SEA Strategic Environmental Objectives seek to contribute to European Green Deal targets – assessment will be presented in the Environmental report.
	Economic growth decoupled from resource use.	
	No person and no place left behind.	
	The European Commission adopted a set of proposals to make the EU's climate, energy, transport and taxation policies fit for reducing net greenhouse gas emissions by at last 55% by 2030, compared to 1990 levels.	
EU Soil Strategy, 2030	The vision and objectives of the EU Soil Strategy seek to achieve good soil health by 2050:	The SEA and the SRRG Masterplan will identify any conflicts between Plan measures and the Soil Strategy objectives as well as opportunities
	- Combat desertification restore degraded land and soil, including land affected by desertification, drought and	for enhancement.



Plan, Programme, Legislation	Description	Implications for the Santry River Restoration and Greenway Masterplan
	floods, and strive to achieve a land degradation-neutral world (Sustainable Development Goal 15.3)	
	- Significant areas of degraded and carbon-rich ecosystems, including soils, are restored	
	- Achieve an EU net greenhouse has removal of 310 million tonnes $CO_2$ equivalent per year for the land use, land use change and forestry (LULUCF) sector	
	- Reach good ecological and chemical status in surface waters and good chemical and quantitative status in groundwater by 2027	
	- Reduce nutrient losses by at least 50%, the overall use and risk of chemical pesticides by 50% and the use of more hazardous pesticides by 50% by 2030	
	- Significant progress has been made in the remediation of contaminated sites	
	- Reach no net land take	
	- Soil pollution should be reduced to levels no longer considered harmful to human health and natural ecosystems and respect the boundaries out planed can cope with, thus creating a toxic-free environment	
	- Achieve a climate-neutral Europe and, as the first step, aim to achieve land-based climate neutrality in the EU by 2035	
	- Achieve for EU a climate-resilient society, fully adapted to the unavoidable impacts of climate change by 2050	



Plan, Programme, Legislation	Description	Implications for the Santry River Restoration and Greenway Masterplan
	- provide food and biomass production, including in agriculture and forestry	
	- absorb, store and filter water and transform nutrients and substances, thus protecting groundwater bodies	
	- provide the basis for life and biodiversity, including habitats, species and genes	
	- act as a carbon reservoir	
	- provide a physical platform and cultural services for humans and their activities	
	- act as a source of raw materials	
	- constitute an archive of geological, geomorphological and archaeological heritage.	
	The strategy addresses the importance of soil in addressing challenges such as climate change mitigation and adaptation. Mid-term objectives are assigned associated with these topics such as those related to increasing soil organic carbon and restoring sustainable carbon cycles in a climate-neutral EU economy. Other relevant aspects addressed include limiting land take and soil sealing, enhancing soil biodiversity for human, animal and plant health, preventing soil and land degradation and restoring healthy soils. Regarding land take, the strategy defines the need for a hierarchy approach whereby, priority is given to reusing and recycling land with a view to avoiding land take. Financial incentives that would contradict this hierarchy, such as fiscal benefits for converting agricultural or natural land into built environment must be phased out.	



Plan, Programme, Legislation	Description	Implications for the Santry River Restoration and Greenway Masterplan
Zero Pollution Action Plan	A key deliverable of the Green Deal, the EU Action Plan: Towards a Zero Pollution for Air, Water and Soil (and annexes), was adopted on 12 <sup>th</sup> May 2021. The zero-pollution vision for 2050 is for air, water and soil pollution to be reduced to levels no longer considered harmful to health and natural ecosystems, that respect the boundaries with which our planet can cope, thereby creating a toxic-free environment.	The Environmental Report will include an assessment against the Strategic Environmental Objectives in terms of identification of potential conflict or enhancement in line with the Zero Pollution Action Plan. SEA objectives are included for air, water and soil.
	The following key 2030 targets are aimed at accelerating reduction of pollution at source:	
	-improving air quality to reduce the number of premature deaths caused by air pollution by 55%	
	- improving water quality by reducing waste, plastic litter at sea (by 50%) and microplastics released into the environment (by 30%)	
	- improving soil quality by reducing nutrient losses and chemical pesticides' use by 50%	
	- reducing by 25% the EU ecosystems where air pollution threatens biodiversity	
	- reducing the share of people chronically disturbed by transport noise by 30%	
	- significantly reducing waste generation and by 50% residual municipal waste.	
EU Pollinators Initiative	This initiative sets strategic objectives and a set of actions to be implemented by the EU and its Member States to reverse the decline of pollinators in the EU and contribute to its global conservation efforts. There are three long-term	The SEA can take an active role in assisting in fulfilling Initiative objectives and actions.  Development and assessment of the Masterplan will also consider the Chartered Institute of



Plan, Programme, Legislation	Description	Implications for the Santry River Restoration and Greenway Masterplan
	objectives (towards 2030) and short-term actions under three priorities:  - improving knowledge on pollinator decline, its causes and consequences	Ecology and Environmental Management (CIEEM) Ireland Policy Group's Briefing Paper (2024) on Biodiversity Net Gain in Ireland.
	-tackling the causes of pollinator decline	
	-raising awareness, engaging society-at-large and promoting collaboration.	
European Landscape Convention (ELC)	This is the first international treaty that exclusively addresses all aspects of European landscape and covers natural, rural, urban and peri-urban areas. The Convention aims to protect, manage and plan landscape and raises awareness of the value of a living landscape. Signatory States areconcerned to achieve sustainable development based on a balanced and harmonious relationship between social needs, economic activity and the environment' considering the cultural dimension of the landscape. The ELC covers 'all' landscapes not just iconic landscapes.	The measures proposed in the SEA need to consider the implications of the strategic direction and aims of this Convention, which will also be addressed through the environmental assessment process.
EU Climate and Energy Framework, 2030	The 2030 climate and energy framework includes EU-wide targets and policy objectives for the period from 2021to 2030. As part of the European Green Deal, in 2020, the Commission proposed to raise the 2030 greenhouse gas emission reduction target including emissions and removals, to at least 55% compared to 1990. Actions required across all sectors were analysed to understand what was needed to achieve this. The EU will thus be able to move towards a climate-neutral economy and implement its commitments under the Paris Agreement by updating its Nationally Determined Contribution.	The SEA will consider the key targets in the assessment of the SRRG Masterplan.



Plan, Programme, Legislation	Description	Implications for the Santry River Restoration and Greenway Masterplan
	Key targets for 2030 are:	
	<ul> <li>At least 40% cuts in greenhouse gas emissions (from 1990 levels)</li> </ul>	
	At least 32% share for renewable energy	
	At least 32.5% improvement in energy efficiency.	
EU Biodiversity Strategy for 2030	This Strategy aims to halt or reverse biodiversity loss and speed up the EU's transition towards a resource efficient and green economy. This is in addition to halting the loss of biodiversity and the degradation of ecosystem services in the EU by 2020, and restoring them in so far as feasible.	The SRRG Masterplan will be assessed to ensure that it will contribute to Biodiversity Strategy objectives with a view to identify effective integration.
	In June 2024, the European Council adopted the Nature Restoration Law. This law is a key element of the EU Biodiversity Strategy and aims to restore ecosystems, habitats and species across the EU's terrestrial and marine territories in order to: enable the long-term and sustained recovery of biodiverse and resilient nature; contribute to achieving the EU's climate mitigation and climate adaptation objectives; and meet international commitments.	
Habitats Directive (92/43/EEC)	The Habitats Directive is one of two main nature conservation Directives (the other being the Birds Directive). It centres around two pillars, one being the Natura 2000 network (designating Special Conservation Areas), the largest network of protected areas in the world, and the other the protection of species of conservation interest. In the event that a proposed plan/programme or project could negatively affect the integrity of a Natura 2000 site or listed species therein, the Habitats Directive requires an Appropriate Assessment. Rather than being a decision-	The SRRG Masterplan will seek to ensure that it does not affect the integrity of a Natura 2000 site or relevant species. Screening for an Appropriate Assessment was carried out in line with the Habitats Directive. The Masterplan was screened in for Appropriate Assessment and a Stage 2 Natura Impact Statement (NIS) is underway. The findings will be integrated into the SEA as relevant.



Plan, Programme, Legislation	Description	Implications for the Santry River Restoration and Greenway Masterplan
	informing instrument, such as EIA and SEA, Appropriate Assessment is a decision-maker in that should significant negative impacts be identified, the associated plan/programme or project will not be allowed to move forward in accordance with the requirements of this Directive.	
Birds Directive (2009/147/EC)	The oldest piece of nature protection legislation in the EU, this Directive seeks to provide protection to all of Europe's natural species. The Directive was set up in response to a growing decline in many of Europe's bird species resulting from pollution, loss and degradation of habitat and unsustainable use. Recognising these threats, the Directive provides emphasis on conservation of habitats for both resident and migratory birds and allows for the designation of Special Protection Areas (SPAs), that, together with the Special Conservation Areas assigned under the Habitats Directive forms the Natura 2000 network. This Directive also bans activities that have a negative impact on birds.	The SRRG Masterplan was screened in for a Stage 2 Natura Impact Statement. The NIS is being developed concurrently to the SEA process and the development of the Master Plan.
Water Framework Directive (2000/60/EC)	The Water Framework Directive seeks to establish a structured framework for action in the field of water policy. The framework provides for the protection of inland surface waters, transitional waters, coastal waters and groundwater, because it:  - Prevents further deterioration and protects and enhances the status of aquatic ecosystems and, with regard to their water needs, terrestrial ecosystems and wetlands directly depending on the aquatic ecosystems  - Promotes sustainable water use based on a longterm protection of available water resources  - Aims at enhanced protection and improvement of the aquatic environment, inter alia, through specific	In accordance with this Directive, designated surface waters must achieve good ecological and chemical status by 2027 and this status must be maintained. In terms of surface water quality and the WFD, the Masterplan objectives seek to contribute to improvement in status of the River Santry. This will be assessed in the Environmental Report.



Plan, Programme, Legislation	Description	Implications for the Santry River Restoration and Greenway Masterplan
	measures for the progressive reduction of discharges, emissions and losses of priority substances and the cessation or phasing-out of discharges, emissions and losses of the priority hazardous substances  - Ensures the progressive reduction of pollution of groundwater and prevents its further pollution  - Contributes to mitigating the effects of floods and droughts and has a significant role to play in protecting and managing water resources.	
Groundwater Directive (2006/118/EC)	The Groundwater Directive aims to prevent and control groundwater pollution, including criteria for assessing good groundwater chemical status	The SRRG Masterplan shall comply with all environmental legislation and align with the achievement of the objectives of the regulatory framework for environmental protection and management.
Drinking Water Directive (98/83/EC)	This Directive provides a framework for improving and maintaining the quality of water intended for human consumption'	The SRRG Masterplan is obliged to comply with, as relevant and appropriate, the requirements of the Directive and transposing regulations.
Flood Directive (2007/60/EC)	Reduce adverse consequences for human health, the environment, cultural heritage and economic activity associated with floods in the Community	Ireland has published Flood Risk Management Plans that set out the strategy, including a set of measures, for the sustainable long-term management of flood risk in respective River Basins. The SRRG Masterplan will be developed with regard to the Flood Risk Management Plan for Liffey & Dublin Bay.
Marine Strategy Framework Directive (MSFD) (2008/56/EC)	This EU Directive is the first all-encompassing piece of European legislation aimed at protection of the marine environment. The main aim is to achieve Good Environmental Status (GES) in European waters by 2020 through the adoption of an ecosystem-based approach to the management of all human activities that impact the marine environment. Implementation of a number of key steps is included to achieve the overriding aim including an initial assessment of the current environmental status of	The SRRG Masterplan will need to operate within the spirit of this Directive, although it does not directly apply to the implementation of the Santry River Restoration and Greenway Masterplan.



Plan, Programme, Legislation	Description	Implications for the Santry River Restoration and Greenway Masterplan
	marine waters as well as the environmental pressures and impacts on the marine environment. The initial assessment must include an economic and social analysis of the use and degradation of the marine environment. The determination of GES must then be carried out based on a number of qualitative descriptors. Environmental targets and associated indicators must then be set in order to guide progress towards the achievement of GES.	
Nitrates Directive (91/676/EC)	The Nitrates Directive aims to protect water quality by preventing nitrates from agricultural sources polluting ground and surface waters and by promoting the use of good farming practices. The Nitrates Directive forms an integral part of the Water Framework Directive and is one of the key instruments in the protection of waters against agricultural pressures. Implementation of the Directive involves identification of polluted waters or water bodies at risk of pollution, designation of Nitrate Vulnerable Zones, establishment of Good Agricultural practices on a voluntary basis, establishment of action programmes to be implemented by farmers on a compulsory basis, and national monitoring and reporting requirements.	The SRRG Masterplan will operate within the requirements of this Directive.
Environmental Quality Standards Directive (Directive 2008/105/EC), as amended by Directive 2013/39/EU	The Environmental Quality Standards Directive aims to achieve good surface water chemical status and also establishes environmental quality standards (EQS) for priority substances and certain other pollutants as provided for in Article 16 of the Water Framework Directive.	The SRRG Masterplan will comply with, as relevant and appropriate, the requirements of the Directive.
A Blueprint to Safeguard Europe's Water Resources	This aims to ensure sufficient availability of good quality water for sustainable and equitable water use	The SRRG Masterplan will have regard for this Blueprint and will contribute towards the achievement of the objectives of the regulatory framework for environmental protection and management



Plan, Programme, Legislation	Description	Implications for the Santry River Restoration and Greenway Masterplan
SEA Directive (2001/42/EC)	The SEA Directive requires that certain plans and programmes are subject to an environmental assessment prior to their implementation.	The SRRG Masterplan is undergoing an SEA in accordance with the Directive.
EIA Directive (2011/92/EU as amended by 2014/52/EU)	The EIA Directives aim to assess and implement avoidance or mitigation measures to eliminate environmental effects, before consent is given of 'projects' likely to have significant effects on the environment by virtue, inter alia, of their nature, size or location are made subject to a requirement for development consent and an assessment with regard to their effects. Those projects are defined in Article 4.	Implementation of the Plan needs to comply with all environmental legislation and align with and cumulatively contribute towards – in combination with other users and bodies and their plans etc. – the achievement of the objectives of the regulatory frame. In addition, in the context of the hierarchy and tiered approach, reference is made to the EPA's (2021) Guidance on Strategic Environmental Assessment – Environmental Impact Assessment Tiering <sup>8</sup> .
Environmental Noise Directive (2002/49/EC)	The Environmental Noise Directive (the END) aims to define a common approach intended to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to the exposure of environmental noise. In addition, it aims to provide a framework for the development of EU measures to reduce noise from major noise emitters including road and rail vehicles and infrastructure, aircraft, outdoor and industrial equipment and mobile machinery.	The SRRG Masterplan will consider this Directive during implementation and refer to strategic noise maps and noise management action plans as relevant.
3. Most Relevant Natio	nal Environmental, Planning & Sectoral Documents	
National Development Plan 2021-2030	The National Development Plan (NDP) 2021-2030 sets out the Irish government's investment strategy, focusing on sustainable development and economic growth for the period 2021-2030. The Plan is designed to foster sustainable economic growth while addressing critical challenges such as climate change and infrastructure deficits across Ireland.	The Masterplan will take into account the objectives of the National Development Plan.

<sup>&</sup>lt;sup>8</sup> Therivel, R., Gonzalez del Campo, A. 2021. Guidance on Strategic Environmental Assessment – Environmental Impact Assessment Tiering. Report 392. EPA Research



Plan, Programme, Legislation	Description	Implications for the Santry River Restoration and Greenway Masterplan
Regional Spatial and Economic Strategy (RSES, 2019-2031) for Eastern and Midland Regional Assembly (EMRA)	EMRA's RSES describes policy for integrated land use and transportation in the Dublin Metropolitan Area. The Strategy proposes strategic greenways and links between them, including for Santry, which aim is to ensure connectivity and enhance recreational opportunities.  Regional Policy Objective (RPO) 5.7 and RPO 5.8 aim to enhance existing green infrastructure (GI) and support the promotion and development of cycle ways and greenways, as set out in the Greater Dublin Area Cycle Network Plan. The RSES recognises the Santry waterway as an asset in particular given that it contributes to the provision of green infrastructure and connectivity.  RSES Section 7.7 Greenways, Blueways and Peatways RPO 7.24 aims to 'Promote the development of a sustainable Strategic Greenway Network of national and regional routes, with a number of high-capacity flagship routes that can be extended and /or linked with local greenways and other cycling and walking infrastructure, notwithstanding that capacity of a greenway is limited to what is ecologically sustainable'.  RPO 7.25: 'Support local authorities and state agencies in the delivery of sustainable strategic greenways, blueways, and peatways projects in the Region under the Strategy for the Future Development of National and Regional Greenways'.  RPO 7.20 seeks to promote the development of improved visitor experiences, nature conservation and sustainable development activities within the UNESCO designated Dublin Bay Biosphere.	The SRRG Masterplan objectives align with the RSES, specifically in relation to enhanced connectivity and permeability, recreational opportunities and the promotion of improved and sustainable visitor experiences within the UNESCO designated Dublin Bay Biosphere.



Plan, Programme, Legislation	Description	Implications for the Santry River Restoration and Greenway Masterplan
Project Ireland 2040 - Our Plan, the National Planning Framework (NPF), (draft revised NPD published in July 2024), and the National Development Plan (2018-2027)	The National Planning Framework is the Irish Government's high- level strategic plan for shaping the future growth and development of to the year 2040. It is a framework to guide public and private investment, to create and promote opportunities for people, and to protect and enhance the environment - from villages to cities, and everything around and in between. With respect to Dublin, the NPF makes specific reference to the delivery of the metropolitan cycle network set out in the Greater Dublin Area Cycle Network Plan inclusive of urban greenways on the river as well as the canal and coastal corridors. Sustainable water management and green infrastructure planning are specific environmental and sustainability goals.	Within the planning hierarchy, the SRRG Masterplan is aligned with the NPF (2018 & draft revision 2024) in relation to enabling and facilitating the future restoration and sustainable development of Dublin City, particularly the city's peri-urban area.
	A draft revised NPF was published in July 2024 for public consultation, which ended on the 12 <sup>th</sup> September 2024. An updated NPF is expected in early 2025.	
	The National Development Plan (NDP) sets out the investment priorities that will underpin the successful implementation of the new National Planning Framework. This will guide national, regional and local planning and investment decisions in Ireland over the next two decades, to cater for an expected population increase of over 1 million people.	
	According to the NPF draft Revision (July 2024), the major policy emphasis on renewing and developing existing settlements established under the NPF 2018 will be continued, rather than allowing the continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. The target is for at least 40% of all new housing to be delivered within the existing	



Plan, Programme, Legislation	Description	Implications for the Santry River Restoration and Greenway Masterplan
	built-up areas of cities, towns and villages on infill and/or brownfield sites. The remainder of Ireland's homes will continue to be delivered at the edge of settlements and in rural areas.	
Climate Action Plan 2024	The Plan provides a detailed plan for taking decisive action to halve Ireland's emissions by 2030 and reach net zero by no later than 2050, as committed to in the Climate Action and Low Carbon Development (Amendment) Act 2021.  The Plan lists actions needed to deliver on Ireland's climate targets and sets indicative ranges of emissions reductions for each sector of the economy. It will be updated annually, to ensure alignment with Ireland's legally binding economywide carbon budgets and sectoral ceilings.	The Masterplan will present relevant targets aimed at net-zero emissions and reduced reliance of fossil fuels as relevant. The Masterplan will align with and contribute towards the achievement of the objectives of CAP24.
The Sustainable Development Goals National Implementation Plan (2022 – 2024)	The National Implementation Plan 2022 - 2024 is in direct response to the 2030 Agenda for Sustainable Development and provides a whole-of-government approach to implement the 17 Sustainable Development Goals (SDGs). The Plan is aligned with the SDGs and sets out five strategic objectives and 51 actions, with 119 measures to achieve the SDGs. It also incorporates 23 external actions from four other National Plans or Strategies which contribute to this objectives of this Plan.	The Masterplan will contribute to the objectives of this Plan.
Sustainable Development: A Strategy for Ireland (1997)	The overall aim of this Strategy is to ensure that economy and society in Ireland can develop to their full potential within a well-protected environment, without compromising the quality of that environment, and with responsibility towards present and future generations and the wider international community.	This strategy contributes to the national strategic context within which the SRRG Masterplan will be aligned.
National Sustainable Mobility Policy (2022)	The National Sustainable Mobility Policy sets out a strategic framework to 2030 for active travel (walking and cycling)	The Masterplan is aligned with the spirit of this policy.



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	and public transport journeys to help Ireland meet its climate obligations. It is accompanied by an Action Plan to 2025 which contains actions to improve and expand sustainable mobility options across the country by providing safe, green, accessible and efficient alternatives to reduce the journeys taken by private vehicles.	
Strategy for the Future Development of National and Regional Greenways (2018)	The objective of this Strategy is to assist in the strategic development of nationally and regionally significant Greenways in appropriate locations constructed to an appropriate standard in order to deliver a quality experience for all Greenways users.	The Masterplan will need to develop within the context of this strategy.
	It also aims to increase the number and geographical spread of Greenways of scale and quality around the country over the next 10 years with a consequent significant increase in the number of people using Greenways as a visitor experience and as a recreational amenity	
National Cycle Network Plan, 2023	A plan for an inter-urban cycle network (incorporating the regional and national greenways network) with the aim of facilitating increased cycling and walking nationally for education, leisure, tourism and commuting trips. The development of this network is important also in the context of the Climate Action Plan (2023), which calls for a significant reduction in transport emissions by 2030.	Alignment with the proposals in the National Cycle Network Plan and the Santry River Restoration and Greenway Masterplan will be assessed.
Clean Air Strategy For Ireland, 2023	The Clean Air Strategy provides the policy framework to identify and promote integrated measures to reduce air pollution and promote cleaner ambient air and delivering on wider national objectives. The Strategy complements the National Air Pollution Control Programme (NAPCP) and builds upon the Climate Action Plan.	The SRRG Masterplan will be cognisant of the spirit of this Strategy and may contribute to the overall objectives on a local scale.



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National Landscape Strategy for Ireland 2015-2025	The National Landscape Strategy will be used to ensure compliance with the European Landscape Convention and to establish principles for protecting and enhancing the landscape while positively managing its change. It will provide a high-level policy framework to achieve balance between the protection, management and planning of the landscape by way of supporting actions.	The Masterplan will need to be cognisant of this Strategy. This will be assessed in the Environmental Report.
National Adaptation Framework (NAF) 2018	NAF specifies the national strategy for the application of adaptation measures in different sectors and by local authorities in their administrative areas in order to reduce the vulnerability of the State to the negative effects of climate change and to avail of any positive effects that may occur	Part of the scope of the SRRG Masterplan is aligned with that of the NAF, on a local scale.
Ireland's 4 <sup>th</sup> National Biodiversity Action Plan 2023-2030	<ul> <li>Ireland's 4<sup>th</sup> National Biodiversity Action Plan 2023-2030<sup>9</sup> sets the national biodiversity agenda for the period 2023-2027. BAP 2023-2027 has six objectives as follows:         <ul> <li>Objective 1: Adopt a whole of government, whole of society approach to biodiversity;</li> <li>Objective 2: Meet urgent conservation and restoration needs;</li> <li>Objective 3: Secure nature's contribution to people;</li> <li>Objective 4: Embed biodiversity at the heart of climate action;</li> <li>Objective 5: Enhance the evidence base for action on biodiversity; and</li> </ul> </li> </ul>	One of the main aspects of the SRRG Masterplan is habitat restoration and management. The Masterplan will actively seek to protect and enhance biodiversity in the study area and is therefore expected to contribute to the achievement of strategic biodiversity targets both in terms of the 4 <sup>th</sup> National Biodiversity Action Plan 2023-2030 as well as in line with the Nature Directives, in particular targeting the protection and enhancing populations of species of conservation significance in the long term. The significance of these likely effects will be assessed in the Environmental Report.

 $<sup>^9 \</sup>quad \text{https://www.npws.ie/sites/default/files/files/nbap-overview-for-conference.pdf}$ 



Plan, Programme, Legislation	Description	Implications for the Santry River Restoration and Greenway Masterplan
	Objective 6: Strengthen Ireland's contribution to international biodiversity initiatives.	
	The National Biodiversity Action Plan 2023-2030¹º (NBAP) for Ireland provides a framework for government, civil society and private sector to track and assess progress towards Ireland's Vision for Biodiversity over a five-year timeframe from 2023 to 2030 in the context of the Convention on Biological Diversity. The NBAP notes that a significant proportion of Ireland's biodiversity is in a vulnerable state. The main threats and pressures to biodiversity in Ireland are from agriculture, forestry and fisheries, natural system modifications (including drainage), mining and quarrying (including peat extraction), climate change, pollution, and invasive species.	
	In preparing the NBAP 2023-2030, a wide range of targets and measures have been considered to enhance ecological biodiversity that were also set out in the previous NBAP. NBAP actions that are relevant to the SRRG Masterplan include the following, to:	
	<ul> <li>enhance appreciation of the value of biodiversity and ecosystem services;</li> <li>optimise opportunities to benefit biodiversity;</li> <li>aim to reduce principal pollutant pressures on terrestrial and freshwater biodiversity;</li> <li>optimise benefits for biodiversity in Flood Risk Management Planning and drainage schemes;</li> <li>promote the control of invasive alien species (IAS); and</li> </ul>	

<sup>&</sup>lt;sup>10</sup> gov.ie - Ireland's 4th National Biodiversity Action Plan 2023–2030 (www.gov.ie)



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	promote sustainability in the aquaculture industry.	
River Basin Management Plans	River Basin Management Plans set out the status of waters in the River Basin District.  The third cycle of the RBMP 2022 – 2027 was recently adopted as the Water Action Plan 2024 <sup>11</sup> . In the third cycle it is proposed that Santry River, designated as a Heavily Modified Water body, will continue to be identified as a priority area: Santry-Mayne Area for Action led by DCC with support from Fingal County Council and the Local Authority Waters Programme (LAWPRO). The new proposed PAA will be expanded to include Santry_010, Santry_020 and Mayne_010 waterbodies. As reported in LAWPRO's Santry River Desktop Assessment (2022) <sup>12</sup> , the Santry River is 'at risk' of achieving WFD environmental objectives of <i>Good Ecological Status</i> by 2027. Ecological status of Santry_010 has been 'Poor', while Santry_020 was recently assigned 'Moderate Ecological Status'.  In addition, the Water Action Plan 2024 will create 46 new Catchment Community Fora. According to the WAP 2024, 'Fora establishment, structure and role will be developed by the Local Authorities Waters Programme (LAWPRO) in five pilot catchments in order to develop a framework for a model on a national scale <sup>13'</sup> .	

<sup>&</sup>lt;sup>11</sup> gov.ie - River Basin Management Plan 2022 - 2027 (www.gov.ie)

<sup>&</sup>lt;sup>14</sup> gov.ie - Minister Noonan launches overarching national plan to improve water quality and restore freshwater habitats (www.gov.ie)



<sup>&</sup>lt;sup>12</sup> Anna Rymszewicz (2022) 'Santry River, Priority Area for Action, Desk Study Report'

<sup>&</sup>lt;sup>13</sup> Water Action Plan 2024, page 9.

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Flood Risk Management Plans arising from National Catchment Flood Risk Assessment and Management Programme  Healthy Ireland Strategic Action Plan 2021-2025	The national Catchment Flood Risk Assessment and Management (CFRAM) programme commenced in Ireland in 2011 and is being overseen by the Office of Public Works. The CFRAM Programme is intended to deliver on core components of the National Flood Policy, adopted in 2004, and on the requirements of the EU Floods Directive.  The Healthy Ireland Framework sets out themes to be implemented over two phases. Priority focus areas in the first phase of the Plan include keeping active. Priority focus	The Flood Risk Management Plan for the Liffey & Dublin Bay River Basin is relevant in the context of the Santry River Restoration and Greenway Masterplan.  The Masterplan contributes to meeting the objectives of the Healthy Ireland Framework through promoting activity and recreation,
	areas are also identified in terms of people's settings.  Healthy cities and counties are a focus area, and the  Strategy promotes measures and other policy instruments that support and encourage active travel (walking and cycling) in urban areas, as well as actions such as promoting the planting of vegetation along rivers to protect water quality and assist in managing flood risks.	enhancing community amenity, and providing flood alleviation.
4. Sub-regional plans		
Eastern and Middle Regional Assembly Regional Spatial and Economic Strategy (RSES 2019-2031)	The Eastern and Midland Regional Assembly (EMRA) RSES 2019-2031 is a strategic plan that aims to support the implementation of Project Ireland 2040 and the economic policies and objectives of the Irish Government. It provides a framework for investment to better manage spatial planning and economic development throughout the Eastern and Midland Region of Ireland. The RSES will be implemented through collaboration among local authorities,	The Santry River Restoration and Greenway Masterplan will need to comply with all regional objectives of the RSES.



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	state agencies, and stakeholders to ensure that the objectives are met effectively over the strategy's lifespan.	
County Development Plans	The County development plan outlines planning objectives for County development over a six-year lifespan. It identifies future infrastructure, development and zoning required, protects and enhances amenities and environment, and guides planning authority in assessing proposals.	The Fingal County Development Plan (2023-2029) and the Dublin City Development Plan (2022-2028) are relevant in the context of the Masterplan.  The Dublin City Development Plan (2022-2028)
		highlights the challenges with water quality and Dublin's watercourses in the context of the Water Framework Directive (WFD). In attempting to improve the quality of its watercourses, reference is made to the Santry River Restoration and Greenway, which will investigate the use of green infrastructure to manage and treat surface water run-off to protect water quality and improve river status.
		The Fingal Development Plan 2023-2029 also makes reference to the Santry River Restoration and Greenway in the context of flood risk management.
		The SRRG Masterplan is being developed within the planning hierarchy of the Development Plans with an aim to achieve relevant Development Plan objectives.
NTA Transport Strategy for the Greater Dublin Area 2022 - 2042	The NTA's Transport Strategy for the Greater Dublin Area (2022-2042) is a long-term plan aimed at improving transportation in Dublin and its surrounding counties. It sets out the framework for investment in transport infrastructure	The SRRG Masterplan will align with the objectives of the Strategy.



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	and services in the Greater Dublin Area (GDA) over the strategy period.	
Greater Dublin Area Cycle Network Plan (2013)	The Greater Dublin Area Cycle Network Plan (2013), developed by the National Transport Authority (NTA), aimed to establish a comprehensive cycling infrastructure across Dublin and its surrounding counties. The plan sought to significantly increase the proportion of trips made by bicycle in urban areas to enhance sustainable transport options. It proposed a structured network of primary and secondary cycling routes, greenways, and inter-urban connections to improve accessibility and safety for cyclists.	The SRRG Masterplan will align with the objectives of the Plan thereby aiming to foster a culture of cycling through improved safety and accessibility.
Dublin City Biodiversity Action Plan 2021-2025	Dublin City Biodiversity Action Plan 2021-2025 includes a strong focus on the city's rivers, canals and parks including the River Santry and St. Anne's Park. North Bull Island, which was the first National Bird Sanctuary in Ireland in 1931, and is included as a Case Study. The Plan, which included significant public participation, identifies key priorities for action including restoring nature in the city and building for biodiversity, e.g., supporting greenways.	The SRRG Masterplan will ensure its objectives are in line with those of the latest Dublin City Biodiversity Action Plan.
Fingal Biodiversity Action Plan 2023-2030	Fingal Biodiversity Action Plan (2023-2030) includes a strong focus on ecosystem restoration and green infrastructure, which reflects the local authority's lead role in promoting the concept of GI in Ireland. The Plan identifies key priorities for action including restoration of terrestrial, freshwater and marine ecosystems in Fingal and working with local communities to enhance the urban environment for biodiversity.	The SRRG Masterplan will ensure its objectives are in line with those of the latest Dublin City Biodiversity Action Plan.
Fingal Climate Action Plan 2024-2029 (CAP)	Fingal's CAP sets out mitigation and adaptation measures and actions across the six theme areas of Energy & Buildings, Transport, Flood Resilience, Nature Based	The Masterplan will help implement actions in line with CAP measures.



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	Solutions, Circular Economy & Resource Management and Community Engagement. The CAP identifies a specific flood defence action in relation to Santry flagging the need for further studies, engaging with the OPW, and the development of suitable flood defence schemes. This action is in line with SDG 11 (Sustainable Cities and Communities), SGD 13 (Climate Action), SDG 15 (Life on Land), SDG 17 Partnership for Goals.	
Dublin City Council Climate Action Plan 2024 – 2029 (CAP)	The DCC CAP also outlines a number of goals and plans to prepare for and adapt to climate change. Actions relevant to Santry within this CAP include RF2: Restoring the City's Rivers. Specific reference is made to the SRRG; Restoration of the Santry River is RF2.1.	The Masterplan will directly implement actions within this CAP.
Heritage Plans	A heritage plan aims to highlight the importance of heritage at a strategic level. It manages and promotes heritage as well as increase awareness, and also aims to conserve and protect heritage.  The Fingal Heritage Plan 2024-2030 and the Dublin City Strategic Heritage Plan 2022-2028sets out a vision for protecting the countys' heritage.	Development and implementation of the Masterplan will need to be cognisant of specific aims and objectives within the Heritage Plans as relevant.

