ENVIRONMENTAL IMPACT ASSESSMENT SCREENING REPORT

PROPOSED PART 8 DEVELOPMENT AT

BURTON PARK, LEOPARDSTOWN ROAD, SANDYFORD, CO. DUBLIN

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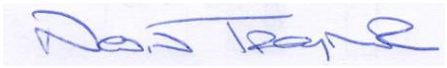
Authorised By:	 ***Nevin Traynor*** *BSc. Env, H.Dip I.T, Cert SHWW, EPA/FAS Cert. Environmental Consultant*

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This report refers, within the limitations stated, to the condition of the site at the time of the report. No warranty is given as to the possibility of future changes in the condition of the site. The report as presented is based on the information sources as detailed in this report, and hence maybe subject to review in the future if more information is obtained or scientific understanding changes.

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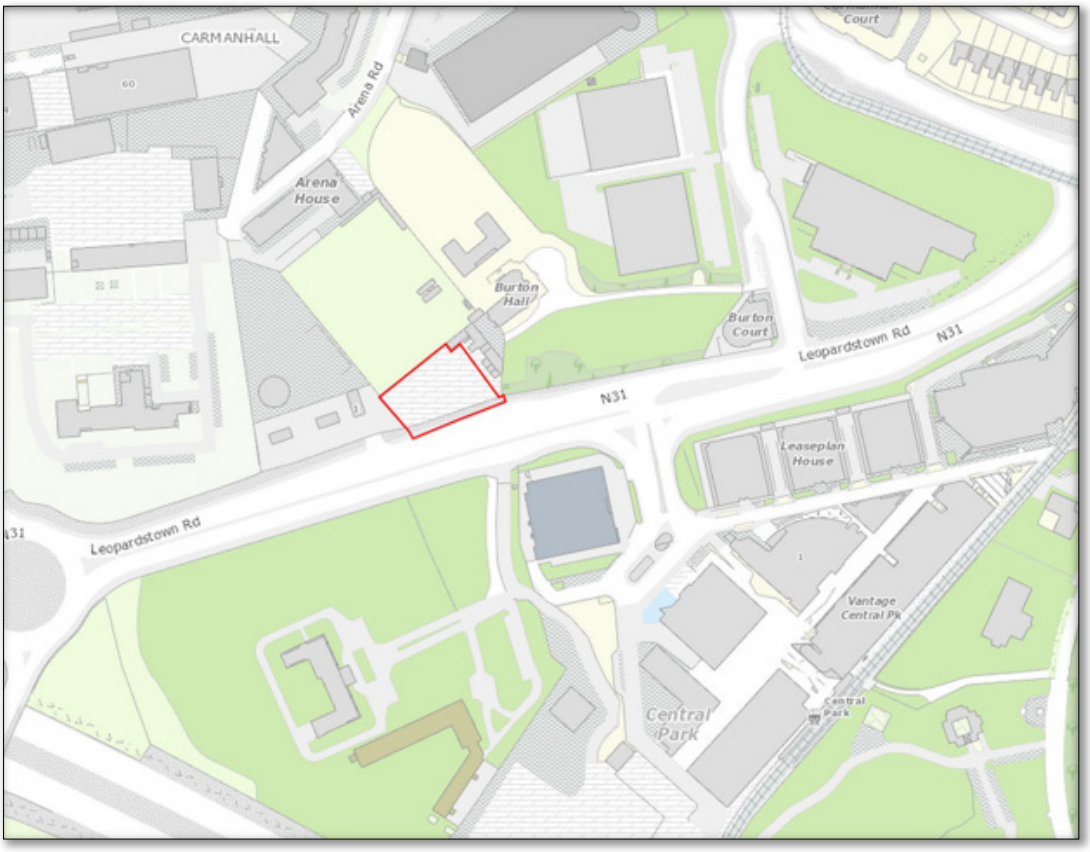
1.0 INTRODUCTION

Traynor Environmental Ltd. were commissioned by Dun Laoghaire-Rathdown County Council, to undertake an Environmental Impact Assessment (EIA) Screening of a proposed development at Burton Park, Leopardstown Road, Sandyford, Co. Dublin.

The indicative site is outlined in red on Figure 1.1 (hereafter referred to as 'the site'). The proposed development is described in further detail in Section 3 below.

Figure 1.1: Site Location Map



The purpose of this report is to provide the information required under Schedule 7A, having regard to the criteria set out in Schedule 7 of the Planning and Development Regulations 2001, as amended. This information will enable a screening determination in respect of the need for an Environmental Impact Assessment Report ('EIAR') for the proposed development.

There is a mandatory requirement for an EIAR to accompany a planning application for some types of development that meet or exceed the "thresholds" specified in Schedule 5 to the Planning and Development Regulations. In addition to the mandatory requirement, there is a case-by-case assessment necessary for sub-threshold developments as they may be likely to have significant effects on the environment. If a sub-threshold development is determined to be likely to have significant effect on the environment, then an EIAR will be required. The second reason for this report is to document the studies undertaken by the Applicant, and the design team, to consider whether the development would be likely to have significant effects on the environment. The proposed development and component parts

have been considered, as documented in Section 2, against the thresholds for EIA as outlined in of the Planning and Development Regulations 2001 (as amended). The proposed development is a sub-threshold development and is not mandatory for EIA.

Traynor Environmental Ltd, have undertaken an assessment of the effects on the environment from the proposed development and has concluded that there are no likely significant environmental effects which would warrant preparation of an EIAR. The assessment is documented in Section 3.0, 4.0 and 5.0 and covers each aspect of the environment in accordance with guidance including Population and Human Health; Biodiversity; Land, Soils, Geology, Hydrogeology, and Hydrology; Air Quality and Climate; Noise and Vibration; Landscape and Visual Impact; Cultural Heritage, and Archaeology; Traffic and Transportation; Material Assets, and Waste.

1.1 EIA Screening Legislation and Guidance

The legislation and guidance listed below has informed this report and the method to EIA Screening:

- Guidelines on the Information to be contained in Environmental Impact Assessment Reports. (2022). Environment Protection Agency.
- Environmental Impact Assessment Screening, OPR Practice Note PN02 (Office of the Planning Regulator, 2021).
- European Union (Planning & Development) (Environmental Impact Assessment) Regulations 2018.
- Environmental Impact Assessment of Projects – Guidance on Screening. (2017). European Commission.
- Environmental Impact Assessment of Projects - Guidance on the preparation of the Environmental Impact Assessment Report. (2017) European Commission.
- Guidelines for Planning Authorities on carrying out Environmental Impact Assessment. (August 2018). Department of Housing, Planning and Local Government.
- Advice Notes for preparing Environmental Impact Statements. (Draft, September 2015). Environment Protection Agency.
- Interpretation of definitions of project categories of Annex I and II of the EIA Directive. (2015) European Commission.
- European Union Environmental Impact Assessment (EIA) Directive 2011/92/EU as amended by 2014/52/EU.
- Planning and Development Act, 2000 (as amended).
- Planning and Development (Housing) and Residential Tenancies Act 2016
- Planning and Development Regulations 2001 (as amended).

The national requirements to provide an EIA with a planning application is outlined in *Planning and Development Act 2000 as amended* ('the Act') and *Planning and Development Regulations, 2001 as amended* ('the Regulations'). In addition to the national legislation there are requirements set out in the EIA Directive (Directive 2011/92/EU as amended by 2014/52/EU); for relevant purposes, the EIA Directive has been transposed into Irish planning legislation through amendments to the Act and the Regulations.

This includes: the criteria set out Schedule 7 of the Regulations; the information set out at Schedule 7A; any further relevant information on the characteristics of the development and its likely significant effects on the environment submitted by the applicant; any mitigation measures proposed by the applicant; the available results, where relevant, of preliminary verifications or assessments carried out under other relevant EU environmental legislation, including information submitted by the applicant on how the results of such assessments have been taken into account, and; the likely significant effects on certain sensitive ecological sites.

The screening process followed in this report is in accordance with the EIA Directive 2011/92/EU of the European Parliament and of the Council as amended by 2014/52/EU and as transposed by the Act and the Regulations and follows the format as per Section 3.2 of the EPA Guidelines (2022). The potential for significant effects of the proposed Project has been considered against the criteria under Schedule 7 of the *Planning and Development Regulations, 2001 as amended.*

In producing this report due regard has been paid to other EIA guidance including the European Commission's 2017 *EIA of Projects Guidance on Screening* as well as the published *Guidelines for Planning Authorities and* the OPR Practice Note PN02 Environmental Impact Assessment Screening.

Preliminary Screening for EIA

The Planning and Development Regulations 2001 (as amended) provide for preliminary examination for EIA. The Departmental Guidelines (August 2018) state as follows in relation to such a preliminary examination:

"For all sub-threshold developments listed in Schedule 5 Part 2, where no EIAR is submitted or EIA determination requested, a screening determination is required to be undertaken by the competent authority unless, on preliminary examination it can be concluded that there is no real likelihood of significant effects on the environment. This is initiated by the competent authority following the receipt of a planning application or appeal.

A preliminary examination is undertaken, based on professional expertise and experience, and having regard to the 'Source – Pathway – Target' model, where appropriate. The examination should have regard to the criteria set out in Schedule 7 to the 2001 Regulations."

1.2 Screening Methodology

The screening process followed in this report is in accordance with the EIA Directive 2011/92/EU of the European Parliament and of the Council as amended by 2014/52/EU and follows the format as per Section 3.2 of the EPA Guidelines (2022).

The key steps to screen for an EIA are set out in Section 3.2 of the EPA Guidelines are as follows:

1. Is the development a type that that requires EIA?
2. Is it of a type that requires mandatory EIA?
3. Is it above the specified threshold?
4. Is it a type of project that could lead to effects? and/or
5. Is it a sensitive location? and/or
6. Could the effects be significant?

The information required to be submitted to make a determination on EIA Screening is set out in Schedule 7A of the Regulations of 2001 (see also Annex IIA of the EIA Directive).

However, it is important to note that Schedule 7A states '*The compilation of the information at paragraphs 1 to 3* [of Schedule 7A] *shall take into account, where relevant, the criteria set out in Schedule 7*.' Having regard to this for the purposes of compiling the relevant information on the likely effects of the proposed development and to address points 4 to 6 above, an evaluation of the characteristics of the project, the sensitivity of the location of the proposed development, and the potential for significant impacts has been made with regard to Schedule 7 of the Regulations.

Schedule 7 of the Regulations of 2001 sets out the criteria to determine whether a development would or would not be likely to have significant effects on the environment. The criteria are broadly set out under the three main headings:

1) *Characteristics of proposed development* (Section 3.0)

   a) *the size and design of the whole of the proposed development,*

   b) *cumulation with other existing development and/or development the subject of a consent for proposed development for the purposes of section 172(1A) (b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment,*

   c) *the nature of any associated demolition works,*

   d) *the use of natural resources, in particular land, soil, water, and biodiversity,*

   e) *the production of waste,*

   f) *pollution and nuisances,*

g) *the risk of major accidents, and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge, and*

h) *the risks to human health (for example, due to water contamination or air pollution).*

2) *Location of proposed development* (Section 4.0)

a. *the existing and approved land use,*

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

c. *the absorption capacity of the natural environment, paying particular attention to the following areas:*

i. *wetlands, riparian areas, river mouths.*

ii. *coastal zones and the marine environment.*

iii. *mountain and forest areas.*

iv. *nature reserves and parks.*

v. *areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive and.*

vi. *areas in which there has already been a failure to meet the environmental quality standards laid down in legislation of the European Union and relevant to the project, or in which it is considered that there is such a failure.*

vii. *densely populated areas.*

viii. *landscapes and sites of historical, cultural, or archaeological significance.*

3) *Types and Characteristics of Potential Impacts (Section 5)*

The likely significant effects on the environment of proposed development in relation to criteria set out under paragraphs 1 and 2, with regard to the impact of the project on the factors specified in paragraph (b)(i)(I) to (V) of the definition of 'environmental impact assessment report' in section 171A of the Act, taking into account—

a. *the magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected),*

b. *the nature of the impact,*

c. *the transboundary nature of the impact,*

d. *the intensity and complexity of the impact,*

e. *the probability of the impact,*

f. *the expected onset, duration, frequency, and reversibility of the impact,*

g. *the cumulation of the impact with the impact of other existing and/or development the subject of a consent for proposed development for the purposes of section 172(1A) (b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment, and*

h. *the possibility of effectively reducing the impact.*

However, it is important to note that Schedule 7A states '*The compilation of the information at paragraphs 1 to 3 [*of Schedule 7A*] shall take into account, where relevant, the criteria set out in Schedule 7*.

1.3 Contributors to The EIA Screening Report

This EIA Screening Report has been informed by the accompanying documents (and the relevant listed mitigation measures as included therein). The preparation and co-ordination of this screening report has been completed by Traynor Environmental Ltd. and has relied on specialist input from Noreen Mcloughlin (AA Screening), Hugh Delaney (Ornithologist) and Dr Tina Aughney (Bat Assessment).

The various assessment address a variety of environmental issues and assess the impact of the proposed development and demonstrate that subject to the various construction and design related mitigation measures recommended that the proposed development will not have a significant impact on the environment. This EIA Screening Report should be read in conjunction with the plans and particulars submitted with the proposal.

It is noted that best practice mitigation measures for the proposed development during the construction and operational phase are set out in various reports.

2.0 SCREENING EVALUATION

2.1 Is the Development A Project

The first step in screening is to examine whether the proposal is a project as understood by the EU Directive. For the purposes of the EU Directive, 'project' means: *"the execution of construction works or of other installations or schemes, or other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources."*

The EPA Guidance (2022) states that if a proposed project is not of a type covered by the Directive, there is no statutory requirement for it to be subject to environmental impact assessment. In determining if the proposed project is of a type covered by the Directive it may be necessary to go beyond the general description of the project and to consider the component parts of the project and/or any processes arising from it.

If any such parts or processes are significant and, in their own right fall within a class of development covered by the Directive, the proposed Project as a whole may fall within the requirements of the Directive.

Each element of the proposed development has been examined and the development clearly meets the definition of a Project as understood by the EU Directive.

2.2 Is the Development A Project That Requires a Mandatory EIA

The next step is to determine if the proposed development is of a *project type* that requires mandatory EIA (i.e., is the proposed development of a project type in which a threshold do not exist). The types of projects to which thresholds do not apply are types that are considered to always be likely to have significant effects.

The type of projects for which an EIA is mandatory is set out in the Schedule 5 Part 1 and Part 2 of the Regulations. An EIA is deemed mandatory under Section 172 of the Act to accompany a planning application for development for the types of projects set out in Schedule 5. This list was developed from Annex I and Annex II of the EIA Directive. The EPA Guidance (2022) requires an assessment beyond the general description of the project and to consider the component parts of the project and/or any processes arising from it.

In considering the wider context and the component parts of the project of the proposed development the thresholds of relevance to the proposal from Part 2 of Schedule 5 are set out below:

10. Infrastructure projects –

(b)(i) Construction of more than 500 dwelling units.

(b)(iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.

(In this paragraph, 'business district' means a district within a city or town in which the predominant land use is retail or commercial use).

15. Any project listed in this Part which does not exceed a quantity, area or other limit specified in this Part in respect of the relevant class of development, but which would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.

For the project types of Class 10 (a) to (m) an EIA is mandatory only if the project equals or exceeds, as the case may be, a limit, quantity or threshold set out. Project Class 15 does not set out any thresholds and a case-by-case assessment is required to be undertaken.

2.3 Is the Project Above the Threshold For EIA

An EIAR is required to accompany an application for permission of a class set out in the Schedule 5 Part 1 and Part 2 of the Regulations which equals or exceeds, as the case may be, a limit, quantity or threshold set for that class of development. A development that does not exceed a limit, quantity or threshold set for that class of development in Schedule 5 of the Regulations is known as a 'sub-threshold development'.

The proposed development and component parts have been considered against the thresholds outlined in Schedule 5, Part 2, Class 10 (a) to (m). The most relevant project type in the context of the proposed development are Class 10 (b)(i) and Class 10 (b)(iv) noted in Section 2.2 above.

Under Class 10 (b) (i) the threshold is '*more than 500 dwelling units*. Under Class 10

(b) (iv) the appropriate threshold is considered to be '*10 hectares in the case of other parts of a built-up area' as* the site location is not within a business district but is within a built-up area. The conservative and pragmatic approach is to consider the area to have a predominant land use for residential use rather than business use.

The total site area for the proposed works is c. 0.23 ha, and the proposed development comprises of Six temporary residential units, along with parking and all associated site works. The proposed development site is not equal to, nor does it exceed the limit, quantity or threshold set out in Class 10(b) (i) and (iv); therefore, an EIA is not mandatory.

2.4 Conclusion – Sub Threshold Development

The proposed development is 'of a type set out in Part 2 of Schedule 5 [in the Planning and Development Regulations, 2001 (as amended)] which does not equal or exceed, as the case may be, a quantity, area or other limit specified in that Schedule in respect of the relevant class of development'. The development is outside the mandatory requirements for EIA and is considered to be sub-threshold for the relevant project type.

An EIA Report is still required to accompany a sub-threshold development which would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7. Therefore, the final step in the screening process is to consider whether the development would be likely to have significant effects on the environment and therefore require an EIAR to be submitted and EIA carried out.

Directive 2014/52/EU requires the developer to provide information on the characteristics of the project and its likely significant effects on the environment, to allow the competent authorities to make a

determination on the requirement for an EIA. The information required is set out in the Directive and transposed Schedule 7A of the Regulations.

The remainder of this report presents the information required by Schedule 7A to demonstrate the likely effects on the environment, having regard to the criteria set out in Schedule 7.

3.0 DESCRIPTION OF THE PROPOSED DEVELOPMENT

3.1 Overview

The proposed development consists of the provision of a Traveller Accommodation Unit at Burton Park, Leopardstown Road, Sandyford, Co. Dublin. Six temporary residential units will be provided at this site, along with parking and all associated site works. Permission for these works will be sought by Dún Laoghaire–Rathdown County Council under Part VIII of planning process. The need for these works was identified within the Dún Laoghaire–Rathdown County Council Traveller Accommodation Programme 2019 – 2024.

3.2 Site Location and surrounding environment

The application site is 0.23ha and it is located in an urban area, and access will be provided by an existing entrance into the site that is just off the Leopardstown Road. The site is 1.1km west of Sandyford and it is 1.4km south of Stillorgan. It is bounded to the south by the Leopardstown Road, to the west by a separate residential area and to the north and east by open green space.

The land use surrounding the site is pre-dominantly sub-urban and it consists of the commercial, residential and industrial areas of Sandyford, Leopardstown and the surrounding suburbs. The dominant habitats associated with these areas include buildings and artificial surfaces and amenity grasslands and gardens. Other habitats represented locally hedgerows, treelines and scattered trees and parkland.

Figure 2 – Site Location Map

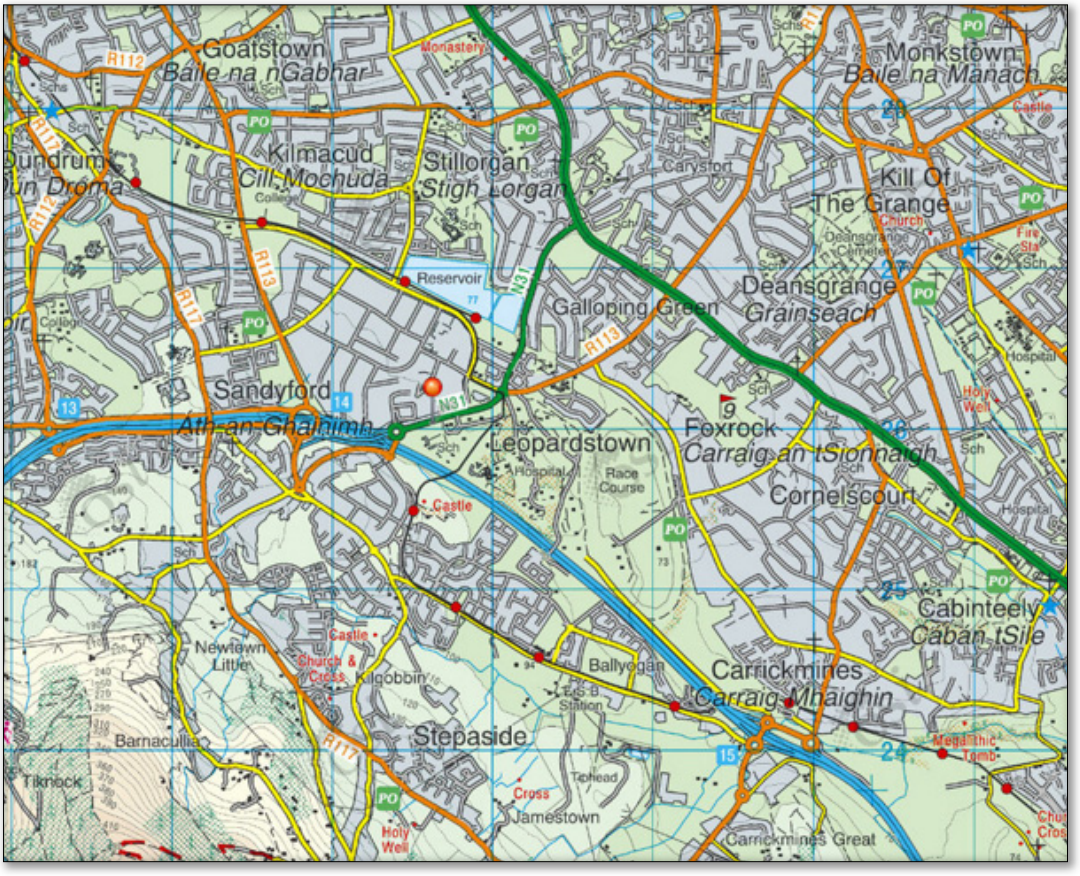


Figure 3 – Aerial Photograph of the Site (Outlined in Red) and its Surrounding Habitats.

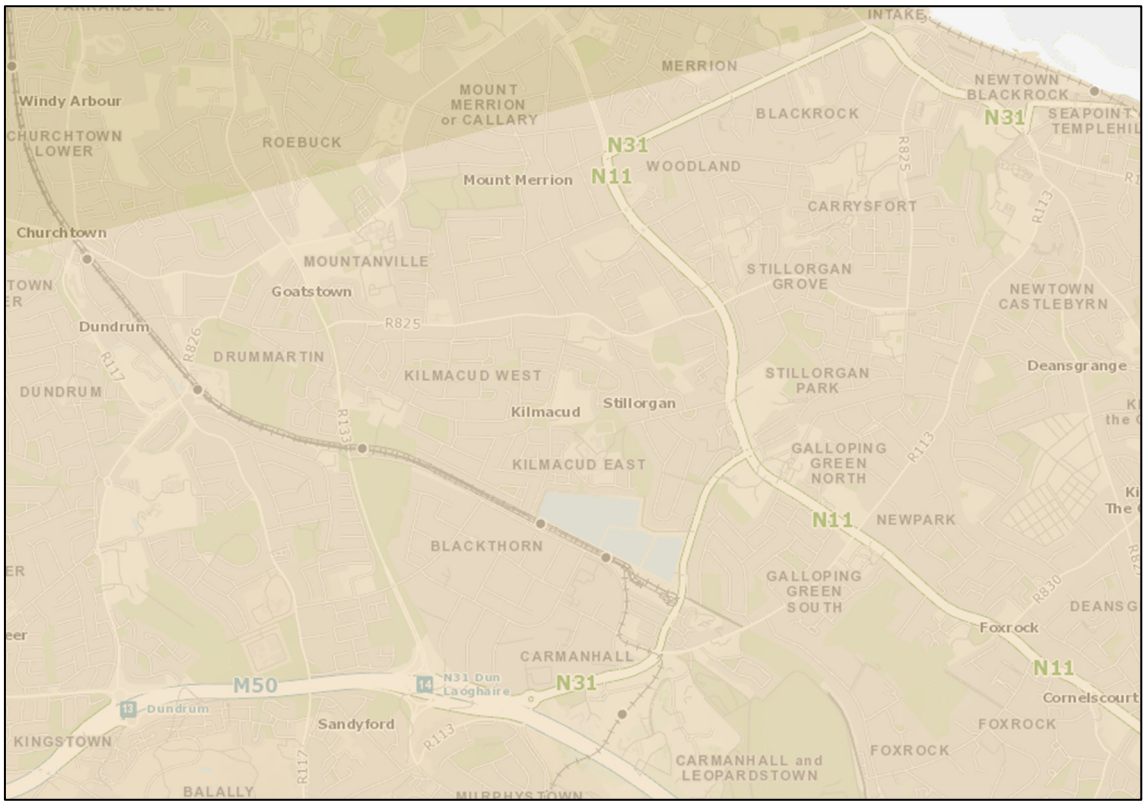
3.3 Water Features and Quality

The application site lies within the Liffey and Dublin Bay Catchment (09) the Dodder Sub-Catchment (010) and the Brewery Stream Sub-Basin (010). There are no watercourses within or adjacent to the application site. The closest watercourse to the site is the Carrickmines Stream and this is 240m west of the site. This stream is largely culverted through the suburban areas of Leopardstown and Carrickmines. This stream flows towards the south-east to join the Shanganagh Stream and this stream enters the sea at Shanganagh.

The EPA have classified the ecological status of the Carrickmines Stream and the Shanganagh Stream as moderate status. Dublin Bay at Shanganagh is noted as being of high ecological status. Under the requirements of the Water Framework Directive, this is satisfactory and this status must be maintained. All watercourses are obliged to meet good ecological status within the timeframe set out in this directive.

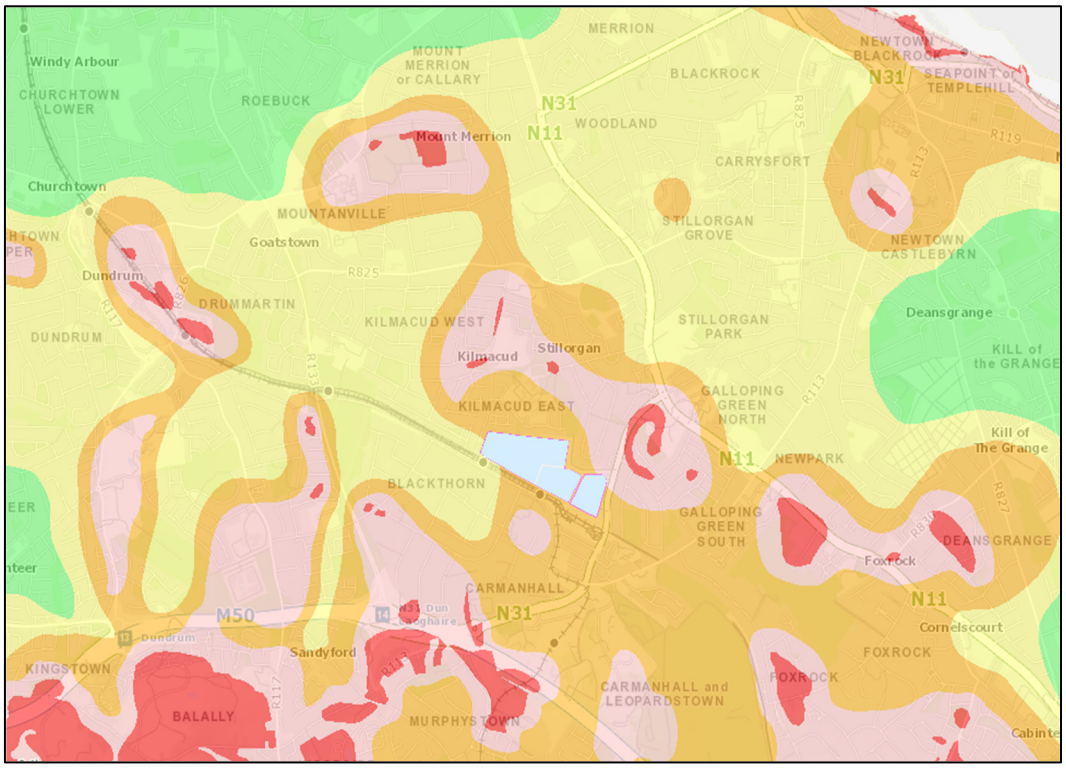
Figure 4 – Local Watercourses and flow Directions (GIS EPA Maps)

Figure 5 - Groundwater/Aquifer Map



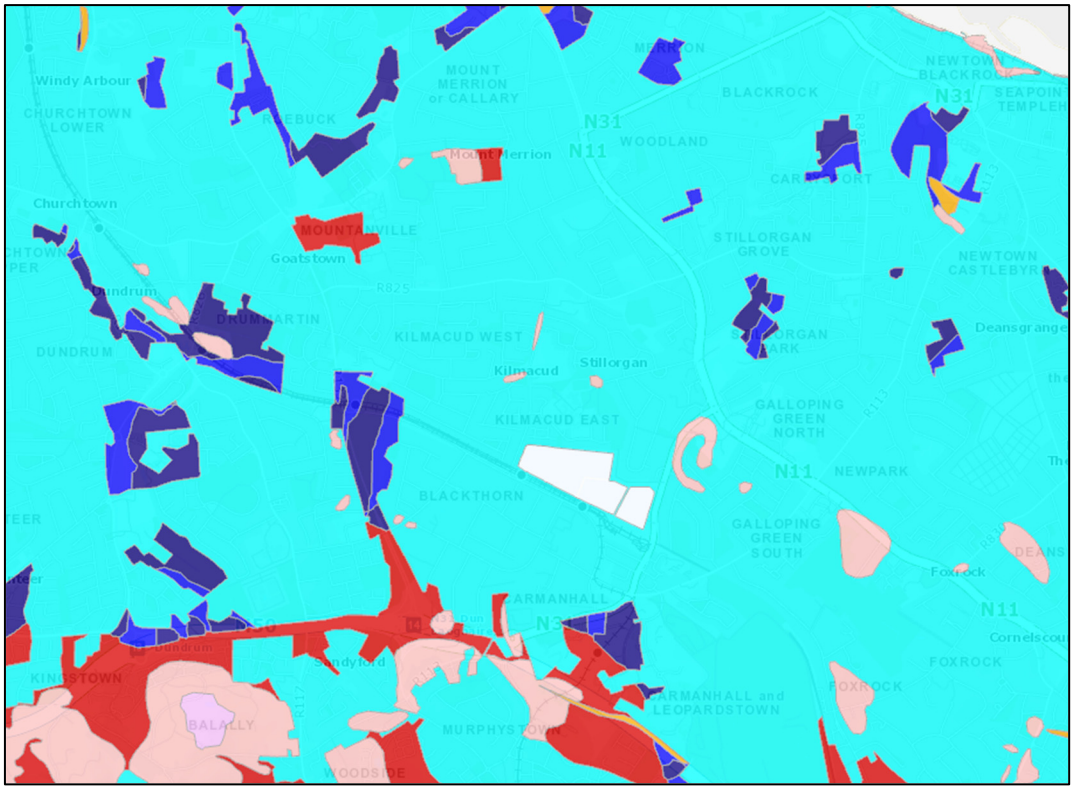
From the GSI Groundwater Aquifer Map this Site is classified as a As Lm - Locally Important Aquifer - Bedrock which is Generally Moderately Productive

Figure 6 - Vulnerability Map



Groundwater data Viewer, GSI Vulnerability Map this site is classified as H - High

Figure 7 - Teagasc Subsoil Map



Geographical Survey Ireland (GSI) indicates sub-soil permeability classification as Urban - Made ground.

3.4 Construction Methodology

The construction sequence will generally be as follows:

1. Site clearance;
2. Drainage works (including services);
3. Foundations;
4. Structural works; and,
5. Ground works, including surfacing and landscaping.

3.5 Drainage

In accordance with the Dún Laoghaire-Rathdown County Council SUDs policies, surface water from the site will be infiltrated on site using appropriate SUDS methods. Excess surface water will then be attenuated on site and discharged via petrol interceptor and hydrobrake to the existing stormwater network which runs the road that provides access into the site.

Wastewater Management

The proposed dwellings on the site will connect to the public sewer.

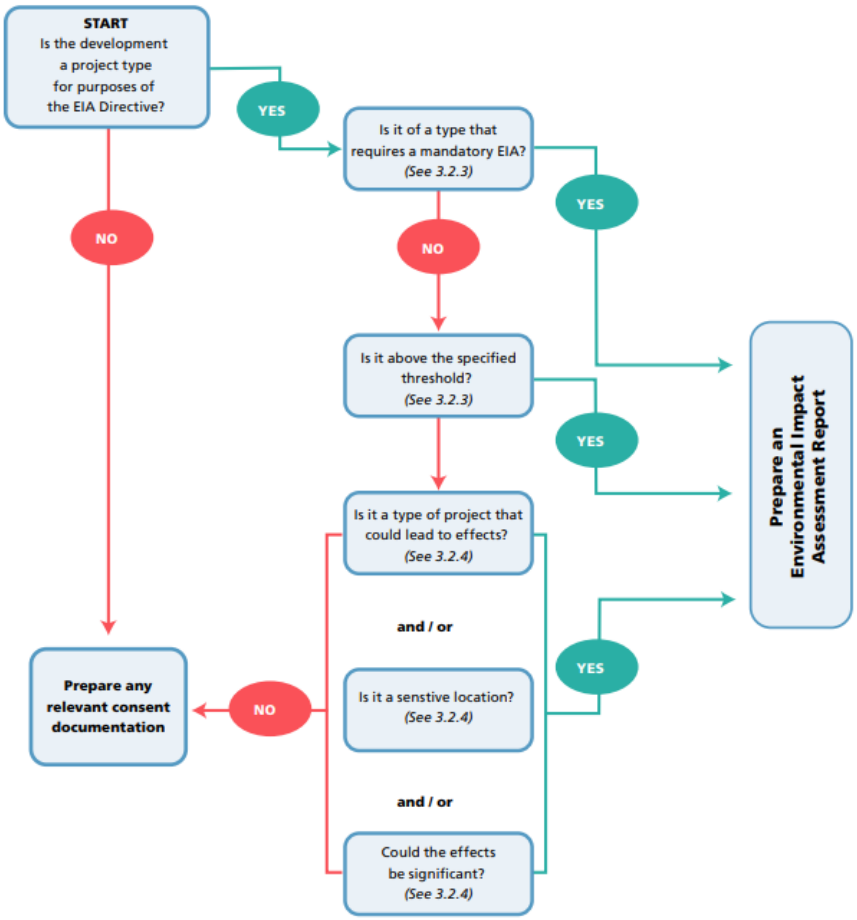
4.0 EIA SCREENING PROCESS

4.1 Introduction

This EIA Screening Report has been prepared by Traynor Environmental Ltd and Whitehill Environmental Ltd. on behalf of Dún Laoghaire-Rathdown County Council, with the aim of documenting the significant environmental effects, positive and negative, which the proposed development is likely to have on the receiving environment. The reference documents used to inform the process are summarised in Section 2.2 Methodology.

The Environmental Impact Assessment of Projects, Guidance on Screening (European Commission, 2017) provides a flow diagram of the Steps in Screening and this is the process generally followed in this Screening Report (See Figure 8).

Figure 8 - Flow Diagram of the Steps in Screening (Source: European Commission Environmental Impact Assessment of Projects, Guidance on Screening, 2022)



4.1.1 Legislation

EIA requirements derive from Council Directive 85/337/EEC (as amended by Directives 97/11/EC, 2003/35/EC and 2009/31/EC) and as codified and replaced by Directive 2011/92/EU of the European Parliament and the Council on the assessment of the effects of certain public and private projects on the environment and as amended in turn by Directive 2014/52/EU.

The legislative requirements which deem whether an EIA is mandatory for a project are outlined in Schedule 5 of the Planning and Development Regulations 2001, as amended. All projects can be placed into one of the following two categories:

- Those that exceed the thresholds laid down and therefore have a mandatory requirement to prepare an EIAR; and
- Those projects that are sub-threshold and must be assessed on a case-by- case basis to determine whether or not they are likely to have significant effects on the environment.

4.1 Methodology

Screening is the process of deciding whether a development requires an EIA. The mandatory and discretionary provisions within Schedule 5 of the Planning and Development Regulations 2001 as amended deem whether an EIA is mandatory for a project.

4.3 Mandatory EIA

As per Schedule 5 of the Planning and Development Regulations 2001, as amended, the proposed development does not meet the thresholds to require a mandatory EIA.

4.4 Sub-Threshold Development

Where a decision is being made on whether a proposed development would or would not be likely to have significant effects on the environment, regard must be given to the following project characteristics outlined in Annex III of the EIA Directive 2014/52/EU:

(a) The size and design of the whole project;

(b) Cumulation with other existing and/or approved projects;

(c) The use of natural resources, in particular land, soil, water and biodiversity;

(d) The production of waste;

(e) Pollution and nuisances;

(f) The risk of major accidents and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge;

(g) The risks to human health (for example due to water contamination or air pollution).

Additionally, the screening process can be aided using the checklists contained within the European Commission publication Environmental Impact Assessment of Projects, Guidance on Screening (2017). Table 1. the criteria are taken from Annex III of the Directive, Section 2.

4.5 Characteristics of the Proposed Development

4.5.1 Size of the Development

The proposed development will comprise of temporary Traveller Accommodations Units.

Table 1 - Criteria for determining whether a development would or would not be likely to have significant effects on the environment.

1. Characteristics of the proposed development

The characteristics of the proposed development, in particular:

- the size of the proposed development
- the cumulation with other proposed development
- the use of natural resources
- the production of waste
- pollution and nuisances
- the risk of accidents, having regard to substances or technologies used.

2. Location of proposed development

The environmental sensitivity of geographical areas likely to be affected by proposed development, having regard in particular to:

- the existing land use
- the relative abundance, quality and regenerative capacity of natural resources in the area
- the absorption capacity of the natural environment, paying particular attention to the following areas:

  (a) wetlands

  (b) coastal zones

  (c) mountain and forest parks

  (d) areas classified or protected under legislation, including special protection areas designated pursuant to Directive 79/40/EEC and 92/43/EEC

  (e) areas in which the environmental quality standards laid down in EU legislation have already been exceeded

  (f) densely populated areas

  (g) landscapes of historical, cultural or archaeological significance

3. Characteristics of potential impacts

The potential significant effects of proposed development in relation to criteria set out under paragraphs 1 and 2 above, and having regard in particular to:

- the extent of the impact (geographical area and size of the affected population)
- the transfrontier nature of the impact
- the magnitude and complexity of the impact
- the probability of the impact
- the duration, frequency and reversibility of the impact

4.5.2 Cumulation with Other Projects

Information on the site and the area of the proposed development was studied prior to the completion of this statement. The following data sources were accessed in order to complete a thorough examination of all impacts:

- National Parks and Wildlife Service - aerial photographs and maps of designated sites, information on habitats and species within these sites and information on protected plant or animal species; conservation objectives, site synopses and standard data forms for relevant designated sites;
- Environmental Protection Agency (EPA)- Information pertaining to water quality, and geology
- Myplan.ie – Mapped based information
- National Biodiversity Data Centre (NBDC) – Information pertaining to protected plant and animal species within the study area
- Architects Department (DLR - Plans and information pertaining to the development
- Dún Laoghaire-Rathdown County Council (eplan website)– Information on planning history in the area in order to ascertain potential cumulative impacts
- An Bord Pleanála website (planning searches)
- Web search for major infrastructure projects in the Dún Laoghaire-Rathdown Area
- Dún Laoghaire-Rathdown County Development Plan (2022 - 2028)

The cumulative impact of the development in combination with existing baseline actions is not significantly worse than any of the individual impacts associated with the construction and operation of the proposed development.

4.5.3 Use of Natural Resources

While exact quantities of materials required during the construction phase have not been determined at this stage, the amount of aggregates and materials that will be imported to the site during construction will be moderate.

4.5.4 Production of Waste

Excavation works will be required for the construction of foundations. The quantity of waste will be small however and will not likely cause significant environmental effects. The proposed development has the potential to result in a small increase in waste generated. Waste products from construction are an inevitable part of development. This process will identify best working practices appropriate for the site with the intention of avoiding significant or unnecessary environmental effects, minimising the production of waste and maximising recycling and reuse of materials. On this basis the waste generation will not be of a level of significance that would require EIA. Once completed the

development would generate domestic waste. Recycling facilities will be installed at the site during construction works to minimise the proportion of waste being sent to landfill. The types of waste arisings and the method of treatment are commonplace and would not necessitate an EIA to evaluate waste impacts.

4.5.5 Risk of Major Accidents and/or Disasters

The risk of accidents associated with this development would not cause unusual, significant or adverse effects of a type that would, in themselves, require an EIA. During the construction stage, the likelihood of an accidental spillage of construction materials into the aquatic environment will be managed through the adoption of strict best practice construction management.

4.5.6 Risk to Human Health

Temporary negative impacts to human health may be likely during the construction phase due to noise, dust, air quality, visual and traffic impacts. These impacts will be short term in nature and small in scale and are therefore not considered to be significant.

4.6 Location of Project

The second criterion included in Annex III of the EIA Directive relates to the geographical location of projects, having regard in particular to:

(a) The existing and approved land use

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

(c) The absorption capacity of the natural environment, paying particular attention to the following areas:

- (i) Wetlands, riparian areas, river mouths;
- (ii) Coastal zones and the marine environment;
- (iii) Mountain and forest areas;
- (iv) Nature reserves and parks;
- (v) Areas classified or protected under national legislation; Natura 2000 areas designated by Member States pursuant to the Habitats Directive;
- (vi) Areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;
- (vii) Densely populated areas;
- (viii) Landscapes and sites of historical, cultural or archaeological significance.

4.6.1 Existing and Approved Land Use

The land use surrounding the site is pre-dominantly sub-urban and it consists of the commercial, residential and industrial areas of Sandyford, Leopardstown and the surrounding suburbs. The dominant habitats associated with these areas include buildings and artificial surfaces and amenity grasslands and gardens. Other habitats represented locally hedgerows, treelines and scattered trees and parkland.

4.6.2 Relative Abundance, Availability, Quality and Regenerative Capacity of Natural Resources

The proposed development will have minimum impact on the quality and regenerative capacity of natural resources in the area. The site is entirely developed and the habitats within it consist of buildings and artificial surfaces and spoil and bare ground. The site perimeters consist of concrete walls. All construction material will be imported for the construction of the proposed development.

4.6.3 The Absorption Capacity of the Natural Environment

4.6.3.1 Overview

The application site is approximately 0.23ha and it is located in an urban area, and access will be provided by an existing entrance into the site that is just off the Leopardstown Road. The site is 1.1km west of Sandyford and it is 1.4km south of Stillorgan. It is bounded to the south by the Leopardstown Road, to the west by a separate residential area and to the north and east by open green space.

An examination of the website of the National Biodiversity Data Centre, revealed that there are no records for the presence of any protected mammal species from the relevant 1km square (O1926) of this proposed development site.

4.6.3.2 Mountains and Forest Areas

There are no mountains or areas of forestry within the study area of the proposed development.

4.6.3.3 Nature Reserves and Parks

There are no nature reserves or parks affected by the proposed development.

4.6.3.4 Nationally Designated Sites & European Sites

The proposed development lies outside the boundaries of the Natura 2000 sites identified in Section 4.7.9. There will be no reduction of designated habitat area. There will be no interference with the boundaries of any designated site.

4.6.3.5 Environmental Quality Standards

There are no known areas in which the environmental quality standards shall be exceeded.

4.6.3.6 Densely Populated Areas

The development is not expected to affect any densely populated areas. The current site is Objective 'F' - To preserve and provide for open space with ancillary active recreational amenities. Under the dlr

County Development Plan, Traveller Accommodation is permitted in principle under this zoning objective.'

It is unlikely that there will be negative impacts to the surrounding area due to the construction of the proposed development due to its scale and the implementation of best practice guidelines. Given the size and scale of the development there is not likely to be any significant impact on road users as a result of the proposed development. The additional increase in traffic as a result of the development will be minimal.

4.6.3.7 Landscapes and Sites of Historical, Cultural or Archaeological Significance

There are no known architectural or archaeological sites or structures within the site area or in the immediate environs of the site.

4.6.3.8 Designated Focal Points/Views

There will be no views, prospects or scenic routes affected by the proposed development.

4.7 Characteristics of the Potential Impacts

4.7.1 Extent of the Impact

The application site is 0.23ha and it is located in an urban area. It is located at Burton park, Leopardstown Road, Sandyford.

4.7.2 Transfrontier Nature of the Impact

There are no trans frontier impacts associated with the proposed development.

4.7.3 Magnitude and Complexity of the Impact

The nature of the building does not fall into the project types mentioned in Schedule 5 of the Planning and Development Regulations 2001.

4.7.4 Air Quality and Climate

It is considered that the scale of construction traffic required for a project of this size will have a Low impact on the local air quality and climate. The proposed development may result in moderate-low generation of dust. A programme of dust monitoring should be put in place and mitigation measures carried out.

4.7.5 Noise and Vibration

An increase in noise and vibration levels is expected during the construction phase but the impact is likely to be temporary in nature. Furthermore, construction works will be carried out in compliance with BS5228: Part 1 and the European Communities (Noise Emission by Equipment for Use Outdoors) Regulations, 2001 which will ensure a controlled level of noise during the construction phase. Once construction begins, it should be complete within 6 months to 1year. Operation of the site will be ongoing. Due to the scale of the project it is considered that the construction and operation of the project will not result in any significant levels of noise or vibration.

4.7.6 Soils and Geology

There will be no land-take from any designated sites. There will be no interference with the boundaries of any designated site. Excavated material from the construction will be used on site. Bare soil will be reseeded straight away where appropriate. Any remaining soil will be disposed of in a responsible manner in a licensed facility away from any designated sites. Due to the moderate scale of the project and the nature of excavation required, it is anticipated that there will be moderate impacts to soils and geology as a consequence of the construction / operation of the project.

4.7.7 Hydrology

The application site does not lie within or adjacent to any area that has been designated for nature conservation purposes. There are no watercourses within or adjacent to the application site. The closest watercourse to the site is the Carrickmines Stream and this is 240m west of the site. This stream is largely culverted through the suburban areas of Leopardstown and Carrickmines. This stream flows towards the south-east to join the Shanganagh Stream and this stream enters the sea at Shanganagh.

4.7.8 Hydrogeology

Hydrogeological assessment addresses the potential impact of the proposed project on groundwater features and groundwater flow regime. During construction plant and machinery will be required on site and as a result it is appropriate to adopt best working practices and measures to protect the underlying groundwater. Accidental spillage of fuels or chemical reagents on site pose a potential contamination risk. The proposed development will involve cut or fill, however, it is considered that there will be moderate impact on the groundwater regime during either construction or operation. Mitigation measures should be put in place.

4.7.9 Biodiversity

Protected Species

A bat survey of this site was carried out by Dr Tina Aughney in August 2022. No bats were recorded emerging from buildings or trees within the survey area. Two bat species were recorded flying over the site. This was the extent of the bat activity in this area, and it is a Low level of bat activity.

In order to determine the potential suitability of the site for wintering birds, most notably breet geese, the site was assessed by ornithologist Hugh Delaney. He confirmed that the habitats within the site are not suitable for brent geese or other wintering bird species. There are no records for brent geese in the area, or any other wintering bird species noted as a Special Conservation Interest of any SPA.

Natura 2000 Sites Identified

In accordance with the guidelines issued by the Department of the Environment and Local Government, a list of Natura 2000 sites within 15km of the proposed development have been identified and described according to their site synopsis, qualifying interests and conservation objectives. In addition, any other sites further than this, but potentially within its zone of interest were also considered. The zone of impact may be determined by an assessment of the connectivity between the application site and the

designated areas by virtue of hydrological connectivity, atmospheric emissions, flight paths, ecological corridors etc.

There are sixteen Natura 2000 designated sites within 15km of the application site. These designated areas and their closest points to the application site are summarised in Table 1 and a map showing their locations relative to the application site is shown in Figure 9. A full description of all these sites can be read on the website of the National Parks and Wildlife Service (npws.ie).

Table 1 – Table 1 – Natura 2000 Sites Within 15km of the Proposed Site

Site Name & Code	Distance from Site	Qualifying Interests	Significant Effects
South Dublin Bay and River Tolka Estuary SPA 004024	3.9km north-east	• Light-bellied Brent Goose (*Branta bernicla hrota)* • Oystercatcher (*Haematopus ostralegus*) • Ringed Plover (*Charadrius hiaticula*) • Grey Plover (*Pluvialis squatarola)* • Knot *(Calidris canutus)* • Sanderling *(Calidris alba)* • Dunlin *(Calidris alpina)* • Bar-tailed Godwit *(Limosa lapponica)* • Redshank *(Tringa totanus)* • Black-headed Gull *(Chroicocephalus ridibundus)* • Roseate Tern *(Sterna dougallii)* • Common Tern *(Sterna hirundo)* • Arctic Tern *(Sterna paradisaea)* • Wetland and Waterbirds	*There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SPA and significant effects arising from pollution during construction or operation can be ruled out.* *The site does not support any habitat that could be used by the QIs of this SPA and significant effects upon these species will not arise.*

South Dublin Bay SAC 000210	3.9km north-east	• Mudflats and sandflats not covered by seawater at low tide • Annual vegetation of drift lines • Salicornia and other annuals colonising mud and sand • Embryonic shifting dunes	*There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SAC and significant effects arising from pollution during construction or operation can be ruled out.* *There will be no direct or indirect impacts or significant effects upon the QIs of this SAC.*
Wicklow Mountains SAC 002122	6.2km south-west	• Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) • Natural dystrophic lakes and ponds • Northern Atlantic wet heaths with *Erica tetralix* • European dry heaths • Alpine and Boreal heaths • Calaminarian grasslands of the Violetalia calaminariae • Species-rich Nardus grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) • Blanket bogs (* if active bog) • Siliceous scree of the montane to snow	*There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SAC and significant effects arising from pollution during construction or operation can be ruled out.* *There will be no direct or indirect impacts or significant effects upon the QIs of this SAC.*

		levels (Androsacetalia alpinae and Galeopsietalia ladani) • Calcareous rocky slopes with chasmophytic vegetation • Siliceous rocky slopes with chasmophytic vegetation • Old sessile oak woods with Ilex and Blechnum in the British Isles • *Lutra lutra* (Otter)	
Wicklow Mountains SPA 004040	6.5km south-west	• Merlin (*Falco columbarius*) • Peregrine (*Falco peregrinus*)	*There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SPA and significant effects arising from pollution during construction or operation can be ruled out.* *The site does not support any habitat that could be used by the QIs of this SPA and significant effects upon these species will not arise.*
Knocksink Wood SAC 000725	6.6km south	• Petrifying springs with tufa formation (Cratoneurion) • Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)	*There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SAC and significant effects arising from pollution during construction or operation can be ruled out.*

			There will be no direct or indirect impacts or significant effects upon the QIs of this SAC.
Dalkey Island SPA 004172	7.5km east	• Roseate Tern (*Sterna dougallii*) • Common Tern (*Sterna hirundo*) • Arctic Tern (*Sterna paradisaea*)	*There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SPA and significant effects arising from pollution during construction or operation can be ruled out.* *The site does not support any habitat that could be used by the QIs of this SPA and significant effects upon these species will not arise.*
Ballyman Glen SAC 000713	7.6km south	• Petrifying springs with tufa formation (Cratoneurion) • Alkaline fens	*There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SAC and significant effects arising from pollution during construction or operation can be ruled out.* *There will be no direct or indirect impacts or significant effects upon the QIs of this SAC.*
Rockabill to Dalkey Island SAC 003000	7.8km east	• Reefs • *Phocoena phocoena* (Harbour Porpoise)	*There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SAC and significant effects arising from pollution during*

			construction or operation can be ruled out. *There will be no direct or indirect impacts or significant effects upon the QIs of this SAC.*
North Dublin Bay SAC 000206	9km north	• Mudflats and sandflats not covered by seawater at low tide • Annual vegetation of drift lines • Salicornia and other annuals colonising mud and sand • Atlantic salt meadows (Glauco-Puccinellietalia maritimae) • Mediterranean salt meadows (*Juncetalia arenaria*) • Embryonic shifting dunes • Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes) • Fixed coastal dunes with herbaceous vegetation (grey dunes) • Humid dune slacks • *Petalophyllum ralfsii* (Petalwort)	*There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SAC and significant effects arising from pollution during construction or operation can be ruled out.* *There will be no direct or indirect impacts or significant effects upon the QIs of this SAC.*
North Bull Island SPA 004006	9km north	• Light-bellied Brent Goose (*Branta bernicla hrota)* • Shelduck (*Tadorna tadorna*)	*There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SPA*

		• Teal (*Anas crecca*) • Pintail (*Anas acuta*) • Shoveler (*Anas clypeata*) • Oystercatcher (*Haematopus ostralegus)* • Golden Plover (*Pluvialis apricaria*) • Grey Plover (*Pluvialis squatarola*) • Knot (*Calidris canutus*) • Sanderling (*Calidris alba*) • Dunlin (*Calidris alpina*) • Black-tailed Godwit (*Limosa limosa)* • Bar-tailed Godwit (*Limosa lapponica)* • Curlew (*Numenius arquata*) • Redshank (*Tringa totanus*) • Turnstone (*Arenaria interpres*) • Black-headed Gull (*Chroicocephalus ridibundus*) • Wetland and Waterbirds	*and significant effects arising from pollution during construction or operation can be ruled out.* *The site does not support any habitat that could be used by the QIs of this SPA and significant effects upon these species will not arise.*
Glenasmole Valley SAC 001209	10.4km south-west	• Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) • Molinia meadows on calcareous, peaty or	*There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SAC and significant effects arising from pollution during construction or operation can be ruled out.*

		clayey-silt-laden soils (Molinion caeruleae) • Petrifying springs with tufa formation (Cratoneurion)*	*There will be no direct or indirect impacts or significant effects upon the QIs of this SAC.*
Bray Head SAC 000714	11.5km south-east	• Vegetated sea cliffs of the Atlantic and Baltic coasts • European dry heaths	*There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SAC and significant effects arising from pollution during construction or operation can be ruled out.* *There will be no direct or indirect impacts or significant effects upon the QIs of this SAC.*
Howth Head SAC 000202	12.9km north	• Vegetated sea cliffs of the Atlantic and Baltic coasts • European dry heaths	*There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SAC and significant effects arising from pollution during construction or operation can be ruled out.* *There will be no direct or indirect impacts or significant effects upon the QIs of this SAC.*
Howth Head Coast SPA 004113	14.3km north-east	• Kittiwake *Rissa tridactyla*	*There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SPA and significant effects arising from pollution during*

			construction or operation can be ruled out. *The site does not support any habitat that could be used by the QIs of this SPA and significant effects upon these species will not arise.*
Baldoyle Bay SAC 000199	14.6km north-east	• Mudflats and sandflats not covered by seawater at low tide • Salicornia and other annuals colonising mud and sand • Atlantic salt meadows (Glauco-Puccinellietalia maritimae) • Mediterranean salt meadows (*Juncetalia maritime)*	*There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SAC and significant effects arising from pollution during construction or operation can be ruled out.* *There will be no direct or indirect impacts or significant effects upon the QIs of this SAC.*
Baldoyle Bay SPA 004016	14.6km north-east	• Light-bellied Brent Goose (*Branta bernicla hrota)* • Shelduck (*Tadorna tadorna*) • Ringed Plover (*Charadrius hiaticula*) • Golden Plover (*Pluvialis apricaria*) • Grey Plover (*Pluvialis squatarola*) • Bar-tailed Godwit (*Limosa lapponica*) • Wetland and Waterbirds	*There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and this SPA and significant effects arising from pollution during construction or operation can be ruled out.* *The site does not support any habitat that could be used by the QIs of this SPA and significant effects upon these species will not arise.*

As there is no hydrological connectivity, this distance is adequate to ensure that there will be no impacts upon these designated sites, or the habitats or species for which these sites are designated.

The generic conservation objectives of these sites are:

1. To maintain the favourable conservation status of the qualifying interests (outlined above) of these SACs.
2. To maintain the extent, species richness and biodiversity of the entire site.
3. To establish effective liaison and co-operation with landowners, legal users and relevant authorities.

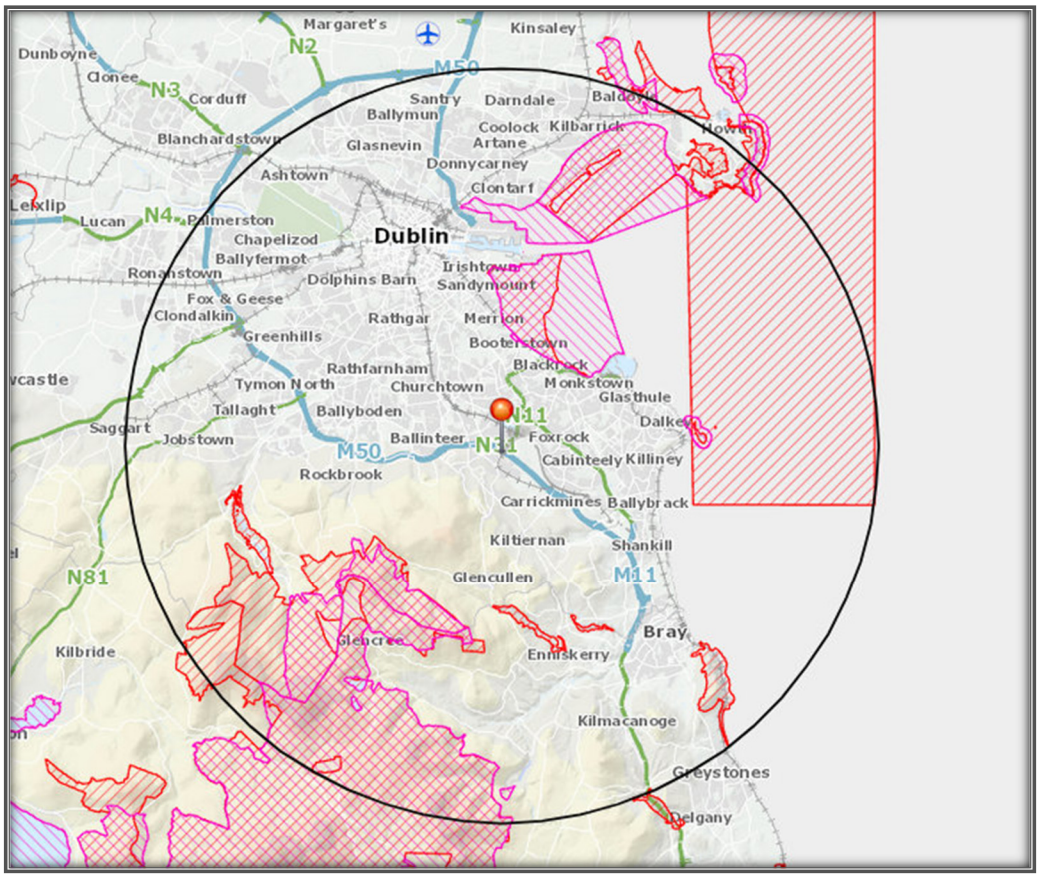
The favourable conservation status of a habitat is achieved when:

- Its natural range and area it covers within that range is stable or increasing and the specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future;
- The conservation status of its typical species is favourable.

The favourable conservation status of a species is achieved when:

- The population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats;
- The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future;
- There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

Figure 9 – The Application Site (Red Dot) in relation to the Natura 2000 Sites within 15km



4.7.10 Archaeology, Architecture and Cultural Heritage

The proposed development will have no impact on any monuments or structures.

4.7.11 Material Assets and Land

A construction project may affect material assets if it involves any of the following:

- Acquisition of land;
- Loss of land used by the community;
- Demolition of private property;
- Revaluation of or change in the development potential of adjoining lands / properties.

The proposed development will not require the demolition of existing structures. It will not involve the acquisition or permanent interference with lands used by the community.

4.7.12 Landscape and Visual Amenity

The construction of the proposed development is not expected to have a significant effect on the visual amenity of the surrounding area. There are no protected views within the area that will be affected by the proposed development and while there may be impacts due to the construction phase, these will be short term in nature and are not likely to be significant.

4.7.13 Population and Human Health

The objective of any population and human health assessment is to examine the potential impact of the construction and operation of the proposed development on the local community and business activities in the local area.

The operation of the proposed development will have positive impact as a competitively priced housing stock is an economic advantage compared to more urban regions. An increase in accommodation reflects a demand for ensuring all individuals within the area have access to appropriate and secure accommodation. Similarly, during construction, the influx of construction workers will be a positive contributing factor to the local economy.

4.7.14 Resource and Waste Management

The key phase with regard to resource and waste management is the construction phase. Due to the moderate scale of the proposed development, it is considered that there will not be a significant amount of waste generated during the construction phase and efforts will be made to re-use materials on site where possible, thus minimising waste.

Overall: Environmental impacts associated with the proposed development will be minor and short term and therefore, significant environmental effects can be ruled out without the necessity for further surveys, investigations and assessments.

4.7.15 Interactions

Whilst there will be interaction between the environmental topics, particularly between human beings and landscape, noise and vibration and air quality and climate, the small scale and nature of these interactions will not result in significant environmental impacts.

4.8 Probability of the Impact

During the construction stage, noise nuisances and air pollution may occur.

4.8.1 Duration, Frequency and Reversibility of the Impact

The potential impacts during the development will be associated with the construction stage. These impacts will be temporary and one-off.

5.0 CONCLUSION

Under Schedule 5 of the Planning and Development Regulations, 2001 it is considered by Traynor Environmental Ltd that the proposed development does not have potential to have significant effects on the environment for those reasons listed in the previous sections and, as such, it is recommended that an EIAR is not required.