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ENVIRONMENTAL IMPACT ASSESSMENT SCREENING REPORT FOR A PROPOSED RESIDENTIAL DEVELOPMENT AT MOUNT ST MARY'S, DUNDRUM ROAD, DUBLIN 14.

Report Prepared For

Dún Laoghaire Rathdown County Council

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1.0 INTRODUCTION

On behalf of Dún Laoghaire Rathdown County Council ('the Applicant'), AWN Consulting Limited ('AWN') has prepared the following Environmental Impact Assessment (EIA) Screening Report as part of a Part 8 application to Dun Laoghaire Rathdown County Council (DLRCC) in relation to a proposed residential development at Mount St Mary's, Dundrum Road, Dublin 14.

The Proposed Development will consist of 129 no. residential units together with associated infrastructure including open space and car/cycle parking and is a mixture of duplexes and apartments in 3 no. buildings ranging in height from two to part six stories.

The Proposed Development is located at a greenfield site at Mount St Mary's, Dundrum Road, Dublin 14, and is 1.02 hectares. The indicative site is outlined in red on Figure 1.1 (hereafter referred to as 'the site'). The development is described in further detail in Section 3 below.

Figure 1.1 *Proposed Development and Surrounding Lands (indicative site boundary in red and ownership boundary in blue)*

1.1 PURPOSE OF THIS REPORT

The purpose of this report is twofold. To provide Dún Laoghaire Rathdown County Council (DLRCC) with the information required under Schedule 7A to demonstrate the likely effects on the environment, having regard to the criteria set out in Schedule 7 of the Planning and Development Regulations 2001, as amended. This information will enable DLRCC to undertake a screening determination in respect of the need for an

Environmental Impact Assessment Report (EIAR) for the Proposed Development. The second reason for this report is to document the studies undertaken by the Applicant and the design team, which demonstrate there are no significant effects predicted as a result of the Proposed Development and the application can be determined by DLRCC without an EIAR having been submitted.

There is a mandatory requirement for an EIAR to accompany a Part 8 application for some types of development that meet or exceed the "thresholds'' as described in Schedule 5 of the Planning and Development Regulations 2001, as amended. 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 according to Schedule 7 and 7A of the Regulations, then an EIA Report will be required.

AWN, along with the project team, have undertaken an assessment of the effects on the environment from the Proposed Development and has concluded that there is no real likely significant environmental effects on the receiving environment for the Proposed Development, therefore a subthreshold EIA is not required. The assessment is documented in Sections 3.0, 4.0 and 5.0 and covers each aspect of the environment in accordance with Schedule 7 and Schedule 7A, and applicable guidance including Population and Human Health; Biodiversity; Land, Soils, Geology, Hydrogeology and Hydrology; Air Quality, Climate; Noise and Vibration; Landscape and Visual Impact; Cultural Heritage and Archaeology; Traffic and Transportation; Material Assets and Waste.

The information presented in this report will enable the competent authority (DLRCC) to undertake a screening determination in respect of the need for an EIAR for the Proposed Development.

1.2 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.
- Transposition of 2014 EIA Directive (2014/52/EU) in the Land Use Planning and EPA Licensing Systems – Key Issues Consultation Paper (2017:DoHPCLG)
- European Union Environmental Impact Assessment (EIA) Directive 2011/92/EU as amended by 2014/52/EU
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment. (August 2018). Department of Housing, Planning and Local Government.

- Interpretation of definitions of project categories of Annex I and II of the EIA Directive. (2015) European Commission
- Planning and Development Act, 2000 (as amended)
- Planning and Development Regulations 2001 (as amended)

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 Annex II A of the EIA Directive 2011/92/EU as amended by 2014/52/EU and Schedule 7 of the *Planning and Development Regulations, 2001* as amended.

1.3 EIA 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, set out in Section 3.2 of the EPA Guidelines, are as follows:

1. Is the development a type 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?

An assessment of the points 1 to 3 above has been made by AWN against the relevant legislation and thresholds set out in Schedule 5 of the Regulations. This evaluation has been documented in Section 2.0.

In order to address Steps 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 sets out the criteria for the Planning Authority to determine whether a development would or would not be likely to have significant effects on the environment. The criteria is broadly set out under the three main headings:

1) *Characteristics of Proposed Development* (Report 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* (Report 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* (Report Section 5.0)

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.*

The Planning Authority must have regard to the Schedule 7 criteria in forming an opinion as to whether or not a development is likely to have significant effects on the environment by virtue, inter alia, of their nature, size or location, and therefore should be subject to EIA.

The information required to be submitted by the developer for the Planning Authority to make a determination on EIA Screening is set out in Schedule 7A of the Regulation, Section 176A(2)(a) of the Act, and Annex IIA of the EU 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*.' The main body of this report (Sections 3.0, 4.0 and 5.0) will cover Schedule 7A fully, but it has been set out to present the information under the headings provided for in Schedule 7 in order to assist the Planning Authority in its screening assessment.

1.4 PROJECT TEAM AND CONTRIBUTORS TO THE EIA SCREENING REPORT

This EIA Screening Report and the Proposed Development has been informed by the accompanying documents submitted with the application (and the relevant listed mitigation measures as included therein). The preparation and co-ordination of this screening report has been completed by AWN and has relied on specialist input from the project design team and applicant, as per Table 1.1.

Table 1.1 *Project Team*

Role	Contributor
Applicant	Dún Laoghaire Rathdown County Council
Architectural Design	Reddy Architecture
Planning Consultant	Hughes Planning and Development Consultants
Civil Engineering including Flood Risk Assessment	TENT Engineering
Landscape Design	Ronan Mac Diarmada & Associates (RMDA)
Population and Human Health; Land Soils, Geology, Hydrogeology, and Hydrology; Air Quality and Climate; Material Assets; Waste Management; Noise and Vibration	AWN Consulting Limited
Biodiversity, including Appropriate Assessment Screening	Open Field (AA Screening and EcIA) and Altemar (Bat Survey Report)

The various reports 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 Part 8 application.

Each environmental specialist of the applicant's project team was commissioned having regard to their previous experience in EIA; their knowledge of relevant environmental legislation relevant to their topic; familiarity with the relevant standards and criteria for evaluation relevant to their topic; ability to interpret the specialised documentation of the construction sector and to understand and anticipate how their topic will be affected during demolition/construction and operation phases of development; ability to arrive at practicable and reliable measure to mitigate or avoid adverse environmental impacts; and to clearly and comprehensively present their findings.

This EIA Screening report was prepared by Sarah Tierney and Mairead Rawal. Sarah Tierney is an Environmental Consultant with AWN Consulting and a graduate member of the Institute of Environmental Management and Assessment (GradIEMA). She has experience in EIA Reports, EIA screening, EPA IE licence applications and compliance reporting for a range of developments, such as pharmaceutical plants, ICT facilities and residential developments. She holds a BA in Environmental Science from Trinity College Dublin and is a member of the Environmental Sciences Association of Ireland. Mairead (BSc, MSc) is a Senior Environmental Consultant at AWN. Mairead holds a Bachelor's degree in Geology and Geography from the University College Cork and a Master's degree in Environmental Science from Trinity College Dublin. She has over 15 years' experience in the environmental consultancy sector and specialises in Industrial Emissions Licensing and EIA.

2.0 SCREENING EVALUATION

Schedule 5 of the Planning & Development Regulations 2001, as amended, sets out a number of classes with applicable thresholds and scales of development that require EIA. There are no relevant classes to the Proposed Development listed in Part 1 of Schedule 5. The classes of relevance to the Proposed Development from Part 2 of Schedule 5 are set out in Table 2.1 below.

Table 2.1 *Relevant Part 2 Schedule 5 Classes for EIA and determination of requirement of EIA*

Development for the Purposes of:	Related Development Details	Exceeds Threshold?
10. Infrastructure projects - (b)(i) Construction of more than 500 dwelling units	The development will consist of 129 dwelling units. The proposed quantity of dwelling units is not equal to nor does it exceed the limit, quantity or threshold set out in Class 10(b)(i); therefore, an EIA is not mandatory under this Project Class.	No – EIA is not mandatory under this class.
10. Infrastructure projects - (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.	The Proposed Development is located within a 'built-up area' and hence 10 hectares is the applicable threshold. The Proposed Development site is 1.02 hectares. The Proposed Development site is not equal to nor does it exceed the limit, quantity or threshold set out in Class 10(b)(iv); therefore, an EIA is not mandatory under this Project Class.	No – EIA is not mandatory under this class.
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.	The Proposed Development has the potential for significant effects on the environment, having regard to the criteria set out in Schedule 7.	The criteria as set out in Schedule 7 and Schedule 7A has been included in this EIA Screening Report to demonstrate if the project is likely to have significant effects on the environment.

2.1 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 EIAR is still required to accompany a Part 8 application for sub-threshold development which is likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7. Therefore, it is also necessary to consider whether an EIAR is required because the development will be likely to have significant effects on the environment, even though it does not meet nor exceed the relevant thresholds in Schedule 5 to the Planning and Development Regulations.

The remainder of this report is to form the basis of the application made for sub-threshold screening for EIA under Class 15 and 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.

The following Sections 3.0, 4.0 and 5.0 will provide information on the characteristics of the Proposed Development; the location and context, and its likely impact on the environment as well as a description of any features of the project and/or measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment. These sections present the information required under Schedule 7A of the Regulations, broadly set out in the same structure as presented in Schedule 7, to ensure that each aspect for consideration is robustly addressed.

For the avoidance of doubt, the mitigation measures, which are referred to in this Screening Report, should be considered as measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment for the purposes of EIA Screening.

3.0 CHARACTERISTICS OF THE PROPOSED DEVELOPMENT

This section addresses the characteristics of Proposed Development by describing the physical characteristics of the whole Proposed Development and a description of the location of the Proposed Development, with regard to the environmental sensitivity of geographical areas likely to be affected.

3.1 SIZE AND DESIGN OF THE PROPOSED DEVELOPMENT

The Proposed Development will consist of 129 no. residential units together with associated infrastructure including open space and car/cycle parking and is a mixture of duplexes and apartments in 3 no. buildings, ranging in height from two to part six stories.

The proposed site layout is illustrated below in Figure 3.1.

Figure 3.1 *Proposed Site Plan (Source: Reddy Architecture, drawing ref: MSM-02-SW-ZZZ-DR-RAU-AR-1004)*

3.1.1 Construction Phase

The site is Greenfield and therefore there will be no demolition on site. An outline Construction Management Plan (CMP) has been prepared by TENT Engineering and submitted with the Part 8 documentation. The CMP includes measures for traffic management and environmental management during the construction phase. The contractor will be required to implement industry best practice pollution prevention measures in accordance with guidance documents (for example CIRIA Guideline Document C532 Control of Water Pollution from Construction Sites), during both construction and operation in order to control the risk of pollution to surface waters.

Welfare facilities (canteens, toilets etc.) will be available within the construction compound and this will remain in place for the construction of the Proposed Development. The offices and site amenities will initially need to have their own power supply (generator), water deliveries and foul water collection until connections are made to the mains networks.

Site development and building works will only be carried out between the hours of 0700 to 1900 Mondays to Fridays inclusive, and from 0800 to 1400 on Saturdays. There will be no construction works carried out on Sundays or public holidays. Deviation from these times will only take place when written approval is granted by DLRCC.

The contractor will implement health and safety measures in relation to the safety of the workforce and the public. Additionally, measures will be applied to minimise traffic delays, disruption and maintain access to residences and businesses along the public road approaching the Proposed Development site. Construction traffic access to the

site will be via the Dundrum Road with advanced warning provided to all users on the road and directional signage for site traffic.

3.1.2 Operational Phase

There are no landscape designations on the subject site and the site is not located within a designated area of landscape character. As outlined in the Landscape Concept (RMDA, 2024), from the perspective of landscape and public space, public open space will be provided in the northern portion of the Proposed Development, providing green infrastructure pathways from the Dundrum Road to Churchfields estate, as well as to the site itself.

Under the Dún Laoghaire County Development Plan 2022 – 2028 the entire site boundary is located within land designated under the zoning objective *A – To provide residential development and improve residential amenity while protecting the existing residential amenities.* The Proposed Development is in keeping with this zoning designation.

Access to the Proposed Development will be from the Dundrum Road. There are dedicated pedestrian facilities and bus lanes along Dundrum Road with vehicular traffic as well. There are various public transport options available, with Dublin Bus Routes 44, 44D and S4, all operating within a 600m radius of the Proposed Development site. The Luas Green Line is accessible from the Milltown stop, located c. 15 minutes walking distance west of the site. Dublin City Centre can be accessed by bike via the dedicated cycle lane on Milltown Road, north of the site.

The primary inputs to the operational phase of the Proposed Development are electricity (provided by connection to the national grid) and water (via connection to the public mains supply). The main outputs are waste, stormwater, foul wastewater and additional traffic generation.

The various reports prepared by the specialist consultants and design team members as outlined within Section 1.3 describe particular aspects of the scheme in further detail, and form part of the overall application. This EIA Screening Report should be read in conjunction with the plans and particulars submitted with the Part 8 application.

3.2 CUMULATION WITH OTHER EXISTING OR PERMITTED DEVELOPMENT

As part of the assessment of the effects of the Proposed Development, account has been taken of other existing or permitted development within the surrounding area that have the potential to combine with the Proposed Development and result in likely significant cumulative effects. Cumulative effects are the effects arising from the addition of many minor or insignificant effects, including effects of other projects, to create larger, more significant effects.

A preliminary assessment of potential cumulative effects on the environment is facilitated via the Source-Pathway-Receptor (SPR) model which is a multi-step process. The SPR methodology is a tool that ensures the most cautious means of assessment at the preliminary stages of a Proposed Development. The use of this tool ensures that all possible impacts are identified at a very early stage thus enabling further studies, mitigation measures or ameliorative actions to be put in place. The inherent use of the precautionary principle within the SPR methodology means that all potential for environmental impacts can be identified at a preliminary stage without any need for detailed studies, but rather upon available desktop information.

It is imperative to make clear that not all projects within a study area are capable of combining with the Proposed Development to result in potential cumulative effects. In order for there to be a potential cumulative effect, all three elements of the SPR elements need to be present. If there is no pathway or functional link (direct or indirect) between the Proposed Development and a receptor, there is no potential for effect. Additionally, if there is no receptor within the area of a potential impact, there is similarly no effect as it does not cause harm to the environment due to the lack of a receptor.

It is acknowledged that projects like the one proposed can have an impact on activity in a larger area that only the Site itself. There is no specific guidance available for a generic zone of influence to focus the assessment of existing development, applications in progress (Proposed Development), or applications granted permission (permitted development) that may result in cumulative effects. The research area has been established using expert judgement and based on the accessibility of data and taking into consideration the potential zone of influence from the potential for environmental effects of the Proposed Development.

Generally, the closer to the works, the greater the potential for impacts. The search has been restricted to 500 m of the subject site; this distance within an urban environment is sufficient to capture any permitted development that may give rise to significant cumulative effects.

The identification of relevant, existing, and approved developments follows a two-fold approach. Firstly, a comprehensive search is undertaken to identify all developments within the vicinity of the Proposed Development site. Subsequently, a review of the magnitude, size, scale, location and current status of these developments is undertaken to assess their potential to contribute to significant cumulative effects. This secondary stage is conducted in alignment with the 2017 guidance from the European Union (EU), which underscores the necessity to focus on effects that are either inherently significant or possess the potential for significance. This comprehensive review is crucial in the context of assessing the potential cumulative effects of a proposed project. It aids in gauging the extent to which these existing and future undertakings might interact with the Proposed Development, and allow for the exclusion of insignificant developments from any further consideration. This strategic approach ensures that resources are not expended on negligible or inconsequential effects.

The initial stage of this process is facilitated through the utilisation of the planning search tools listed below which collectively hold a comprehensive inventory of planning applications, which systematically generated a comprehensive list of relevant planning permissions granted within the immediate environs of the Proposed Development. A combination of online mapping tools was used for this search including:

- The Department of Housing, Local Government and Heritage EIA Portal[1]
- An Bord Pleanála Map Search[2]
- My Plan National Planning Application Map Viewer[3]

Appendix A lists the relevant planning history within the vicinity of the subject site. This list is not intended to be an exhaustive list of all developments, the intent is to provide the competent authority, and the public, with context for their EIA determination by outlining the relevant existing or permitted development that could give rise to likely

[1] https://www.gov.ie/en/publication/9f9e7-eia-portal/ (accessed 08 Oct 2024)
[2] https://www.pleanala.ie/en-ie/Map-search (accessed 08 Oct 2024)
[3] https://www.myplan.ie/national-planning-application-map-viewer/ (accessed 08 Oct 2024)

significant cumulative effects in combination with the Proposed Development. The consideration of likely significant cumulative effects has been considered as part of the impact assessments within Section 5 of this report.

The review of the online planning tool noted a large number of insignificant small extensions, changes of use, advertisements, retention and other minor alterations to sites within the surrounding area. These permissions omitted from the list of permissions as they are for established business and residences within the vicinity of the development. These have been, where relevant, considered as a part of the overall project impact.

It is important to note that each project currently permitted shown in the table is subject to an EIA and/or planning conditions which include appropriate mitigation measures to minimise environmental impacts. Any new development proposed in the surrounding area would be accompanied by and EIA, or EIA Screening as required and the take into consideration the development of this site.

3.3 USE OF NATURAL RESOURCES (LAND, SOIL, WATER, BIODIVERSITY)

This section describes the Proposed Development in terms of the use of natural resources, in particular land, soil, water, biodiversity.

Land and Soil

The Proposed Development is c. 1.02 hectares and is located on greenfield land which is currently not in use. The proposed land use is acceptable within the context of the existing land uses in the surrounding area, which are predominantly residential.

The Proposed Development will require the excavation and disturbance of soils and stone materials for the purposes of site clearance and levelling, foundations and installation of services. Suitably excavated material, including topsoil will be retained on site for use as backfill and landscaping, where possible. Should excavated material need to be removed from site it will be taken for appropriate offsite reuse, recovery, recycling and / or disposal.

All waste soils prior to being exported off-site, will be classified as inert, non-hazardous or hazardous in accordance with the EPA's Waste Classification Guidance – List of Waste & Determining if Waste is Hazardous or Non-Hazardous document (dated 1st June 2015) to ensure that the waste material is transferred by an appropriately permitted waste collection permit holder and brought to an appropriately permitted or licensed waste facility. Materials that can be reused as a by-product offsite will be notified to the EPA as a by-product. This ensures that waste and other materials removed from the site will have no significant effect on the environment.

Water Consumption

During construction of the scheme, water will be required for offices and welfare facilities, this will be provided by temporary connection to the public main by agreement between the Main Contractor and Uisce Éireann. The construction phase will not use such a quantity of water to cause concern in relation to significant effects on the environment.

Once the development is completed and the development is occupied there will be a water demand for primarily domestic consumption for usage for showers, toilets, cleaning and cooking. A Pre-connection Enquiry was submitted to Uisce Éireann (UÉ)

to determine the feasibility of connecting to the public water supply infrastructure. At the time of writing a response has not yet been received from UÉ.

There is no proposed extraction of groundwater at the site for drinking water / potable purposes.

Biodiversity

Investigations into the implications on existing biodiversity has been undertaken through the Appropriate Assessment (AA) Screening Report (Open Field, 2024), Ecological Impact Assessment (EcIA) (Open Field, 2024) and Bat Fauna Impact Assessment (Altemar, 2024) which have been included with the Part 8 documentation.

A site visit was carried out by Open Field on 31 July 2024, to identify the extent and quality of habitats present on the site. The site survey included incidental sightings or proxy signs (prints, scats etc.) of faunal activity.

The EcIA (Open Field, 2024) defines the site habitats using the Fossitt's Guide to Habitats in Ireland. The Proposed Development lands themselves are centred on a field of Dry Meadow (GS1). To the east there is a small area of Amenity Grassland (GA2) and a small expanse of Artificial Surface (BL3). Treeline (WL2) bounds the south, west and north of the site, accompanied by Scrub (WS1). There is a small grove of Scattered Trees (WD5) to the north. There are no plant species growing on the development site which are listed as alien invasive species as listed on SI No. 477 of 2011. As set out in the EcIA, these habitats range from negligible ecological value to low local ecological value.

The EcIA (Open Field, 2024) assesses the suitability of habitats onsite for a range of fauna. There are no water courses or wetlands which provide habitat for Otter. The habitats of the site are suitable for Badgers although no signs of their activity were noted during the survey (latrines, prints, setts etc.). Fox *Vulpes vulpes*, was noted during the site survey and it is likely a breeding den is present, perhaps within the scrub area. Fox is not a protected species and is common in Dublin city. This is the only mammals species for which direct evidence was recorded. Trees and scrub provide opportunity for a variety of common nesting birds, however no birds were noted during the site survey.

As detailed in the Bat Fauna Impact Assessment (Altemar, 2024), bat emergent and detector surveys were undertaken onsite on the 19th and 25th of September, and trees on site were examined for bat roosting potential. A Soprano Pipistrelle bat roost was noted within an ivy-clad Ash (*Fraxinus* excelsior) in the southwestern portion of the site. This tree is to be felled as part of the proposal. No evidence of bat activity was noted within the buildings to be demolished on site. During the bat detector surveys, a single Soprano pipistrelle was observed emerging from an ivy-clad Ash along the western boundary of the site. Foraging activity of Lesser Noctule (Nyctalus leisleri) and Soprano pipistrelle (Pipistrellus pygmaeus) was also noted on site. The removal of the trees on site will result in a loss of foraging areas and a potential loss in a bat roost.

The Appropriate Assessment (AA) Screening Report (Open Field, 2024) has assessed the potential for significant impacts of the construction and operational phases of the Proposed Development on Natura 2000 sites. In order for an effect to occur there must be a pathway between the source (the development site) and the receptor (the Special Area of Conservation (SAC) or Special Protection Area (SPA)). Where a pathway does not exist an impact cannot occur. The AA Screening asses potential pathways from habitat loss, habitat disturbance, pollution from operational wastewater and stormwater

discharge and construction phase pollution. The AA Screening Report concludes that the possibility of any significant impacts on any Natura 2000 site, whether arising from the project itself or in combination with other plans and projects, can be excluded beyond a reasonable scientific doubt on the basis of the best scientific knowledge available.

In respect of the foregoing; the Proposed Development will result in the loss of a confirmed bat roost in addition to reducing the sites foraging potential for bats; the Proposed Development is considered to consume/use biodiversity resources at a local level.

3.4 PRODUCTION OF WASTE

Construction Phase

During the construction phase, waste will be produced from surplus materials such as broken or off-cuts of timber, plasterboard, concrete, tiles, bricks, etc. Waste from packaging (cardboard, plastic, timber) and oversupply of materials may also be generated. The construction contractor will be required to ensure that oversupply of materials is kept to a minimum and opportunities for reuse of suitable materials is maximised.

Waste will also be generated from construction workers e.g. organic/food waste, dry mixed recyclables (wastepaper, newspaper, plastic bottles, packaging, aluminium cans, tins and Tetra Pak cartons), mixed non-recyclables and potentially sewage sludge from temporary welfare facilities provided onsite during the construction phase. Waste printer/toner cartridges, waste electrical and electronic equipment (WEEE) and waste batteries may also be generated infrequently from site offices.

If material is removed off-site it could be reused as a by-product (and not as a waste). If this is done, it will be done in accordance with Regulation 15 (By-products) (Previously Article 27 and referred to as Article 27 in this report) of S.I. No. 323/2020 - European Union (Waste Directive) Regulations 2020, which requires that certain conditions are met and that by-product notifications are made to the EPA via their online notification form. Excavated material should not be removed from site until approval from the EPA has been received. The potential to reuse material as a by-product will be confirmed during the course of the excavation works, with the objective of eliminating any unnecessary disposal of material.

If any soils/stones are imported onto the site from another construction site as a by-product, this will also be done in accordance with Article 27. Article 27 will be investigated to see if the material can be imported onto this site for beneficial reuse instead of using virgin materials.

It should be noted that until final materials and detailed construction methodologies have been confirmed it is difficult to predict with a high level of accuracy the construction waste that will be generated from the construction of the Proposed Development, as the exact materials and quantities may be subject to some degree of change and variation during the construction phase.

Operational Phase

The Proposed Development will give rise to a variety of everyday waste and recycling from the development during the operational phase, i.e. when the project is completed,

and fully operational. The typical non-hazardous and hazardous wastes that will be generated at the Proposed Development will include the following:

- Dry Mixed Recyclables (DMR) - includes wastepaper (including newspapers, magazines, brochures, catalogues, leaflets), cardboard and plastic packaging, metal cans, plastic bottles, aluminium cans, tins and Tetra Pak cartons;
- Organic waste – food waste and green waste generated from internal plants / flowers;
- Glass; and
- Mixed Non-Recyclable (MNR)/General Waste.

In addition to the typical waste materials that will be generated at the development on a daily basis, there will be some additional waste types generated less frequently / in smaller quantities which will need to be managed separately including:

- Green / garden waste may be generated from external landscaping;
- Batteries (both hazardous and non-hazardous);
- WEEE (both hazardous and non-hazardous);
- Printer cartridges / toners;
- Chemicals (paints, adhesives, resins, detergents, etc.);
- Light bulbs;
- Textiles;
- Waste cooking oil (if any generated by the residents); and
- Furniture (and, from time to time, other bulky wastes).

Wastes should be segregated into the above waste types to ensure compliance with waste legislation and guidance while maximising the re-use, recycling and recovery of waste with diversion from landfill wherever possible.

The estimated waste generation for the Proposed Development for the main waste types is presented in Table 3.1 for the Proposed Development. Further detail on the management of these waste streams can be found in the Operational Waste Management Plan (OWMP) (247501.0516WMR01) prepared by AWN Consulting, and submitted with the Part 8 documentation.

Table 3.1 *Estimated waste generation for the Proposed Development for the main waste types*

Waste Type	Waste Volume (m^3 / week)			
	Block A	**Block B**	**Block C 1-bed Units (Individual WSAs)**	**Block C 2-bed Units (Individual WSAs)**
Organic Waste	0.93	0.77	0.01	0.02
DMR	6.57	5.43	0.08	0.11
Glass	0.18	0.15	0.00	>0.01
MNR	3.46	2.86	0.05	0.07
Total	**11.14**	**9.21**	**0.14**	**0.20**

All waste contractors collecting waste from the site must hold a valid collection permit to transport waste, which is issued by the National Waste Collection Permit Office (NWCPO) and waste will only be brought to suitably registered/permitted/licenced facilities. It is essential that all waste materials are dealt with in accordance with regional and national legislation, as outlined previously, and that time and resources are dedicated to ensuring efficient waste management practices.

These measures will ensure the waste arising from the Proposed Development is dealt with in compliance with the provisions of the *Waste Management Act 1996*, as amended, associated Regulations, the *Litter Pollution Act 1997* and the *National Waste Management Plan for a Circular Economy 2024 – 2030* (2024). It will also ensure optimum levels of waste reduction, reuse, recycling and recovery are achieved.

3.5 POLLUTION AND NUISANCES

There are potential short-term nuisances such as dust, noise, as well as the potential for pollution of groundwater associated with construction activities. Site development and building works will only be carried out between the hours of 0700 to 1900 Mondays to Fridays inclusive, and from 0800 to 1400 on Saturdays. There will be no construction works carried out on Sundays or public holidays. Deviation from these times will only take place when written approval is granted by DLRCC. No activity, which would reasonably be expected to cause annoyance to residents in the vicinity, will take place outside of these hours. If there is any occasion when work must be complete outside these hours, following grant of written approval by DLRCC, advance notice will be provided to businesses and residents in the vicinity.

An outline Construction Management Plan (CMP) has been prepared by TENT Engineering which has been submitted with the Part 8 documentation. The CMP outlines construction phase mitigation and management of air quality control (dust), noise, hazardous materials storage and traffic (deliveries, waste collection, etc.) that will be undertaken during the construction phase. All mitigation measures outlined therein will be implemented, as well as any additional measures required pursuant to planning conditions which may be imposed.

The CMP will be updated prior to commencement of construction and will be maintained by the contractors during the construction phase. This will cover all potentially polluting activities and include an emergency response procedure. All personnel working on the construction site will be trained in the implementation of the plan and procedures.

After the implementation of the CMP, pollution and nuisances during construction are not considered likely to have the potential to cause significant pollution and nuisance effects.

3.6 RISK OF MAJOR ACCIDENTS AND/OR DISASTERS

The 2014 revision to the EIA Directive introduced the requirement for an assessment of the risk of major accidents and disasters into the scope of an EIA. As explained the recital of the Directive: “In order to ensure a high level of protection of the environment, precautionary actions need to be taken for certain projects which, because of their vulnerability to major accidents, and/or natural disasters (such as flooding, sea level rise, or earthquakes) are likely to have significant adverse effects on the environment. For such projects, it is important to consider their vulnerability (exposure and resilience) to major accidents and/or disasters, the risk of those accidents and/or disasters occurring and the implications for the likelihood of significant adverse effects on the environment.”

Landslides, Seismic Activity and Volcanic Activity

The landslide susceptibility map (GSI spatial map viewer) identifies areas which are subject to landslides and is measured from low to high. The landslide susceptibility

map considers the location of landslides and what causes them (slope, soil type and the impact of the flow of water). Based on the GSI spatial map viewer, the Proposed Development site is not in an area susceptible to landslides, with a GSI Landslide Susceptibility Classification of Low.

There are no active volcanoes in Ireland so there is no risk of volcanic activity.

In Ireland, seismic activity is recorded by the Irish National Seismic Network. The Geophysics Section of the School of Cosmic Physics, Dublin Institute for Advanced Studies, has been recording seismic events in Ireland since 1978 (www.dias.ie). This network consists of several seismometers that are located throughout Ireland. Seismic activity and earthquake risk in Ireland are generally considered to be low. This is because Ireland is located on the western edge of the Eurasian Plate, which is a tectonic plate that is not known for its seismic activity. However, earthquakes can still occur in Ireland, although they are typically small and have little impact. There is a very low risk of seismic activity to the Proposed Development and Masterplan site. This means that there is less than a 2% chance of potentially-damaging earthquake shaking in the next 50 years.

Flooding/Sea Level Rise

A Flood Risk Assessment (FRA) was prepared by TENT Engineering (2024), and submitted with the planning documents. The potential risk of flooding on the site was reviewed with regard to tidal, fluvial, pluvial, groundwater and historic flooding events relevant to the area of the subject site.

With reference to the FRA, the subject site is located entirely within Flood Zone C, i.e. the probability of flooding is low (less than 0.1% AEP or in 1 in 1000 year) for river flooding. In addition, the site is not at risk of coastal, pluvial or groundwater flooding. Historically, with reference to the OPW's past flooding records, the site has never experienced flooding of any kind. The Proposed Development's drainage design includes for a 20% climate change allowance. The design of the drainage network is in accordance with the relevant codes and regulations as set-out by the Office of Public Works, Dún Laoghaire Rathdown County Council, Building Regulations and Uisce Éireann.

The FRA concludes that the proposed site level (equal to or higher than existing ground level) is above the level obtained for fluvial flood risk, tidal flood risk and climate change simulation.

Major Accidents/Hazards

The Seveso Directive (Directive 82/501/EEC, Directive 96/82/EC, Directive 2012/18/EU) was developed by the EU after a series of catastrophic accidents involving major industrial sites and dangerous substances. Such accidents can give rise to serious injury to people or serious damage to the environment, both on and off the site of the accident. The Chemicals Act (Control of Major Accident Hazards involving Dangerous Substances) Regulations 2015 (S.I. No. 209 of 2015) (the "COMAH Regulations"), implement the latest Seveso III Directive (2012/18/EU).

The purpose of the COMAH Regulations is to transpose the Seveso Directive into Irish law and lay down rules for the prevention of major accidents involving dangerous substances, and to seek to limit as far as possible the consequences for human health and the environment of such accidents, with the overall objective of providing a high level of protection in a consistent and effective manner.

The closest Notified Seveso Establishment to the Proposed Development is the Lower Tier establishment Synergen Power Limited, located c. 4.2 km northeast of the site in Dublin Port. There is a concentration of 13 no. Seveso establishments in the port, all at a greater distance from the Proposed Development than Synergen Power Limited. The site is not a Seveso facility and is not within the consultation distance of any Seveso facility. Therefore, there are no implications for major accidents or hazards at the Proposed Development site.

The Proposed Development has been designed in accordance with the Safety, Health and Welfare at Work Act 2005 (S.I. 10 of 2005) as amended and the Safety, Health and Welfare at Work (General Application) Regulations 2007 to 2016 (S.I. 299 of 2007, S.I. 445 of 2012, S.I. 36 of 2016) as amended and associated regulations.

Minor Accidents/Leaks

There is a potential impact on the receiving environment as a result of minor accidents/leaks of fuel/oils during the construction stage in the absence of mitigation. However, the implementation of the mitigation measures set out in this report (Section 5, below) and the CMP will ensure that the residual effect on the environment is imperceptible.

3.7 RISKS TO HUMAN HEALTH

The EC 2017 *Guidance on the preparation of the Environmental Impact Assessment Report* outlines that human health is a very broad factor that is be highly project dependent. The guidance states: *The notion of human health should be considered in the context of the other factors in Article 3(1) of the EIA Directive and thus environmentally related health issues (such as health effects caused by the release of toxic substances to the environment, health risks arising from major hazards associated with the project, effects caused by changes in disease vectors caused by the project, changes in living conditions, effects on vulnerable groups, exposure to traffic noise or air pollutants) are obvious aspects to study.*

The EPA guidance explains that the scope of population and human health is project dependant but should consider significant impacts likely to affect aspects such as: convenience (expanded range of transport options); nuisance/ disturbance from lighting; displaced settlement patterns (residential); employment opportunities; settlement patterns; land use patterns; access for tourism, amenity, health impacts and/or nuisance due to noise, dust or water pollution; and health and safety.

The nearest residential locations to the Proposed Development are the Churchfields residences located at the closest point c. 10m to the east of the site and c. 50m to the north, residences located along the Dundrum Road c. 15m to the west of the site, and the Hawthorn Meadows residences c. 40m to the southeast. The closest school, Alexandra College Junior School, is located c. 0.3km northwest of the site. Clonskeagh Hospital is located c. 0.7km northeast of the site.

The characteristics of the Proposed Development, in terms of the risks to human health (for example, due to water contamination, air pollution or potential major accident scenarios discussed in Section 3.6, above) have been considered. The primary potential impacts of the Proposed Development on human health would be the potential for increased air pollution due to dust and traffic emissions, noise, or pollution of groundwater/watercourses as a result of the Proposed Development during the

construction phase. Once the Proposed Development is operational there are potential impacts in respect of visual impact and noise generation.

The CMP (TENT Engineering, 2024) includes best practice construction methodologies for the control of dust generation, traffic, noise and hazardous material storage during the construction phase. Any impacts associated with construction such as dust generation, traffic, and noise will be short term in duration, not significant and localised.

The Proposed Development is located in Clonskeagh in an area zoned for residential development. The surrounding environs of the site are characterised by a mix of residential development and open space areas, therefore the Proposed Development will be in keeping with the local surrounding landscape. There will be no negative impact on local parks. There is no likelihood of significant effects on local tourism or shopping amenities as a result of the Proposed Development.

Geological Survey of Ireland (GSI) data indicates that the site does not lie within a drinking water protection area and as such there is no potential for impact on water supply. The proposed mitigation measures during the construction phase, including the implementation of the CMP will ensure that there are no impacts on groundwater, run-off water quality or flow, or the stormwater mains.

Once the Proposed Development is operational, a Class 1 bypass separator will be in place upstream of the site's overall outfall to filter out pollutants and hydrocarbons from the surface water runoff before it is discharged to the Churchfields estate public stormwater sewer. Wastewater from the Proposed Development will connect to mains supplies and will not have a potential impact on local amenities or the local population.

The Proposed Development does not pose any significant risk to human health, given its nature, scale and location. The potential impacts likely to affect population and human health have been considered in Section 5.1 below.

4.0 LOCATION AND CONTEXT OF THE PROPOSED DEVELOPMENT

4.1 EXISTING AND APPROVED LAND USE

The subject site is a c. 1.02 hectare greenfield site which is currently not in use, and is located at Mount St Mary's, Dundrum Road, Dublin 14.

The site is bound to the east by the Churchfields residences. The site is bound to the south by the Catholic University Schools rugby grounds. The Dundrum Road bounds the site to the west. The site is bound to the north by lands under the ownership of the Applicant which feature the Join Managerial Body Secretariat of Secondary School and the Financial Support Services Unit.

Under the Dún Laoghaire County Development Plan 2022 – 2028 the entire site boundary is located within land designated under the zoning objective *A – To provide residential development and improve residential amenity while protecting the existing residential amenities.* The Proposed Development is in keeping with this zoning designation.

Figure 4.1 *Proposed Development Land Use Zoning (DLRCC Development Plan 2022-2028) (indicative site boundary in red and ownership boundary in blue)*

There are various public transport options available, with Dublin Bus Routes 44, 44D and S4, all operating within a 600m radius of the Proposed Development site. The Luas Green Line is accessible from the Milltown stop, located c. 15 minutes walking distance west of the site. Dublin City Centre can be accessed by bike via the dedicated cycle lane on Milltown Road, north of the site. The site is well connected to significant destinations such as Dublin City Centre, Dundrum Town Centre, UCD and DCU.

Nearby recreational facilities include the Windy Arbour playground, Shanagarry Park, and Milltown Golf Club. Movies @ Dundrum cinema, the Mill Theatre and Dundrum Library are located south of the site in Dundrum town centre.

4.2 RELATIVE ABUNDANCE, AVAILABILITY, QUALITY AND REGENERATIVE CAPACITY OF NATURAL RESOURCES IN THE AREA AND ITS UNDERGROUND

4.2.1 Geology and Hydrogeology

Mapping from the Geological Society of Ireland (GSI, 2024) indicates the bedrock underlying the site is part of the Lucan Formation (code CDLUCN) and made up of dark limestone and shale (‘calp).

The GSI/ Teagasc (2024) mapping database of the quaternary sediments in the area of the subject site indicates the principal subsoil type underlying the Proposed Development is till derived from limestones.

The GSI (2024) National Bedrock Aquifer Map classifies the bedrock aquifer beneath the subject site as a ‘LI, Locally Important Aquifer – Bedrock which is moderately productive only in local zones’. The GSI currently classifies the aquifer vulnerability in the region predominantly as Low (L) throughout the site. A small area in the northwestern corner is classified as Moderate (M).

The Proposed Development is within the 'Dublin' (EU Code: IE_EA_G_008) groundwater body. The most recent WFD groundwater status for the Dublin groundwater body (2016-2021) is 'Good', and the WFD risk score is under review.

The GSI Well Card Index is a record of wells drilled in Ireland, water supply and site investigation boreholes. It is noted that this record is not comprehensive as licensing of wells is not currently a requirement in the Republic of Ireland. This current index does not show any wells drilled or springs at the site or surrounding area. The area is serviced by Local Authority mains therefore it is unlikely that any wells are used for potable supply. The site is not located near any public groundwater supplies or group schemes. There are no groundwater source protection zones in the immediate vicinity of the site.

There are no sensitive soil receptors, no identified areas of geological heritage or groundwater supplies in the vicinity of the site boundary.

The importance of the soil and geology attributes for the Proposed Development site is defined as 'Low' based on the TII methodology (2009) criteria for rating site attributes. This is due to the following reasons: the attribute has a low quality, significance or value on a local scale. The importance of the hydrogeological attributes for the Proposed Development site is defined as 'medium' based on the TII methodology (2009) criteria for rating the importance of hydrogeological attributes. This is due to the locally important aquifer.

4.2.2 Hydrology

The Proposed Development site lies within the Liffey and Dublin Bay catchment (Hydrometric Area 09) and River Dodder sub-catchment (WFD name: Dodder_SC_010, Id 09_16) (EPA, 2024). The nearest surface water receptor is the Slang River (Dodder_050, EU_CD: IE_EA_09D010900) which is located c. 100m to the west of the Proposed Development site. The Slang River discharge into the River Dodder c. 200m northwest of the site. The River Dodder ultimately discharges into the Dublin Bay via the Liffey Estuary (EU_CD: IE_EA_090_0300), approximately 7 km northeast of the site. The designated sites in Dublin Bay include North Dublin Bay pNHA, North Bull Island SPA, North Dublin Bay SAC, South Dublin Bay pNHA, South Dublin Bay and River Tolka Estuary SPA and South Dublin Bay SAC.

The Environmental Protection Agency (EPA, 2024) on-line mapping presents the available water quality status information for water bodies in Ireland. The Slang River (Dodder_050) has a WFD Status 2016-2021 of 'Moderate' and a WFD Risk Score of 'At risk'. Urban waste-water and urban run-off are noted as significant pressures, with associated nutrient and organic pollution issues and morphological issues. The Liffey Estuary Lower transitional waterbody has a WFD status (2016-2021) of 'Moderate' and a WFD risk score of 'At risk'. Urban waste-water is noted as a significant pressure, with associated nutrient pollution issues. Dublin Bay has a WFD status (2016-2021) of 'Good' and a WFD risk score of 'Not at risk'.

Stormwater from the Proposed Development will drain to the existing public stormwater sewer located to the east of the site in the Churchfields estate, ultimately discharging to the River Dodder. The proposed surface water drainage system incorporates SuDS features including green roofing, blue roofing, permeable paving, tree pits, Aco-drains, an attenuation soakaway and Class 1 bypass separator. Wastewater from the Proposed Development will connect to the existing public wastewater sewer located to the east of the site in the Churchfields estate, to be ultimately treated at Ringsend WWTP.

The sensitivity and importance of the hydrology attributes for the Proposed Development site is defined as 'medium' based on the TII methodology (2009) criteria for rating the importance of hydrology attributes. This is due to the fact that there is no direct connectivity to a major receiving waterbody for the site, there are no surface water sources of potable water, amenity or fisheries values in the surrounding area, and the receiving water has a 'Moderate' status.

4.2.3 Biodiversity and Areas of Conservation

The potential ecological impacts of Proposed Development have been considered in terms of the sensitivity of the location through the AA Screening Report (Open Field, 2024) and EcIA (Open Field, 2024) included with the Part 8 documentation.

The site habitats consist mainly of Dry Meadow (GS1), Amenity Grasslands (GA2) and Artificial Surfaces (BL3). Treeline (WL2) and accompanying Scrub (WS1) bound the site to the south west and north. There is a small grove of Scattered Trees (WD5) to the north.

The AA Screening identified two SACs and four SPAs within the potential zone of influence of the Proposed Development. These sites are outlined in the Table 4.1 below.

Table 4.1 *European Sites located within the Potential Zone of Influence*

Site Code	Site name	Distance (km)[4]
000210	South Dublin Bay SAC	2.8
004024	South Dublin Bay and Tolka Estuary SPA	2.9
000206	North Dublin Bay SAC	7.5
004006	North Bull Island SPA	7.5
004236	North-West Irish Sea SPA	7.6
004063	Poulaphouca Reservoir SPA	21.1

There are potential indirect pathways to the Natura 2000 sites in Dublin Bay via stormwater discharges from the site. Even in the unlikely event that construction or operation pollution entered the River Slang or River Dodder via stormwater, the distance to Natura 2000 sites following this pathway is over 6km and this is too far for any measurable effect to arise within Natura 2000 sites.

Additional foul water loading to Ringsend WWTP arising from the operation of the Proposed Development are not significant as there is no evidence that pollution through nutrient input is affecting the conservation objectives of any of the Natura 2000 sites in Dublin Bay.

Fresh water supply for the Proposed Development will be via a mains supply. This may originate in the Poulaphouca Reservoir. Evidence, detailed further in the AA Screening Report (Open Field, 2024), suggests that abstraction is not affecting the conservation objectives for Greylag Geese or Black-headed Gulls at the Poulaphouca Reservoir. Therefore, no effects are likely to arise to the Poulaphouca Reservoir SPA arising from the Proposed Development.

[4] Distances indicated are the closest geographical distance between the Proposed Development and the European site boundary, as made available by the NPWS. Connectivity along hydrological pathways may be significantly greater.

The AA Screening (Open Field, 2024) concludes that, on the basis of the screening exercise carried out above, the possibility of any significant impacts on any Natura 2000 site, whether arising from the project itself or in combination with other plans and projects, can be ***excluded*** beyond a reasonable scientific doubt on the basis of the best scientific knowledge available. In reaching that conclusion, it was not necessary to consider any measures to avoid or reduce the impact of the Proposed Development.

4.3 ABSORPTION CAPACITY OF THE NATURAL ENVIRONMENT

The Proposed Development due to its size and localised nature will not have any effect on wetlands, riparian areas, river mouths, coastal zones and the marine environment, mountain and forest areas, nature reserves and parks, or densely populated areas.

The development site is not located within or adjoining an Architectural or General Conservation Area; is not located within or adjoining a Native Woodland Trust; and is not covered by protected views, scenic routes or viewpoints. The Record of Monuments and Places was consulted in the Archives of the Department of Culture, Heritage and the Gaeltacht. There are no Recorded Monuments or Protected Structures within the Proposed Development site. Directly to the north of the site, within the Applicant's ownership boundary, Emmet House is listed on the Record of Protected Structures (RPS no. 18).

The environmental sensitivity of the proposed location in respect of Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive has been addressed in the AA Screening Report prepared by Open Field and submitted with the Part 8 documentation.

5.0 TYPES AND CHARACTERISTICS OF POTENTIAL IMPACTS

This section sets out the likely significant effects on the environment of Proposed Development in relation to criteria set out under paragraphs 1 and 2 (as set out in Sections 4 and 5 above), 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 (as amended).

The quality, magnitude and duration of potential impacts are defined in accordance with the criteria provided in the *Guidelines on Information to be Contained in Environmental Impact Assessment Reports* (EPA 2022) this criteria is duplicated in Table 5.1.

Table 5.1 *Schedule of Impacts following EPA Guidelines*

Characteristic	Term	Description
Quality of Effects	Positive	A change which improves the quality of the environment
	Neutral	No effects or effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error.
	Negative/Adverse	A change which reduces the quality of the environment
Describing the Significance of Effects	Imperceptible	An effect capable of measurement but without significant consequences
	Not significant	An effect which causes noticeable changes in the character of the environment but without significant consequences
	Slight Effects	An effect which causes noticeable changes in the character of the environment without affecting its sensitivities

Characteristic	Term	Description
	Moderate Effects	An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends
	Significant Effects	An effect, which by its character, magnitude, duration or intensity alters a sensitive aspect of the environment
	Very Significant	An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment.
	Profound Effects	An effect which obliterates sensitive characteristics
Describing the Extent and Context of Effects	Extent	Describe the size of the area, the number of sites, and the proportion of a population affected by an effect.
	Context	Describe whether the extent, duration, or frequency will conform or contrast with established (baseline) conditions (is it the biggest, longest effect ever?)
Describing the Probability of Effects	Likely Effects	The effects that can reasonably be expected to occur because of the planned project if all mitigation measures are properly implemented.
	Unlikely Effects	The effects that can reasonably be expected not to occur because of the planned project if all mitigation measures are properly implemented.
Describing the Duration and Frequency of Effects	Momentary Effects	Effects lasting from seconds to minutes
	Brief Effects	Effects lasting less than a day
	Temporary Effects	Effects lasting less than a year
	Short-term Effects	Effects lasting one to seven years.
	Medium-term Effects	Effects lasting seven to fifteen years
	Long-term Effects	Effects lasting fifteen to sixty years
	Permanent Effects	Effects lasting over sixty years
	Reversible Effects	Effects that can be undone, for example through remediation or restoration
	Frequency of Effects	Describe how often the effect will occur. (once, rarely, occasionally, frequently, constantly – or hourly, daily, weekly, monthly, annually)
Describing the Type of Effects	Indirect Effects (a.k.a secondary or Off-site effects)	Effects on the environment, which are not a direct result of the project, often produced away from the project site or because of a complex pathway.
	Cumulative Effects	The addition of many minor or insignificant effects, including effects of other projects, to create larger, more significant effects.
	'Do Nothing Effects	The environment as it would be in the future should the subject project not be carried out
	`Worst case' Effects	The effects arising from a project in the case where mitigation measures substantially fail
	Indeterminable Effects	When the full consequences of a change in the environment cannot be described
	Irreversible Effects	When the character, distinctiveness, diversity, or reproductive capacity of an environment is permanently lost
	Residual Effects	The degree of environmental change that will occur after the proposed mitigation measures have taken effect
	Synergistic Effects	Where the resultant effect is of greater significance than the sum of its constituents (e.g. combination of SO_x and NO_x to produce smog)

5.1 POPULATION AND HUMAN HEALTH

5.1.1 Construction Phase

Potential Impacts

The construction phase of the Proposed Development will provide a limited amount of temporary employment of construction workers which will provide benefits for local businesses providing retail or other services to construction workers and potential additional employment in the area.

The potential impacts of the Proposed Development on human health and populations would be nuisances such potential for spills, increased air pollution (dust), noise, and visual impact during the construction phase. There is no significant risk of pollution of soil, groundwater or watercourses associated with the Proposed Development.

There is the potential for elevated levels of noise to impact the sensitive locations nearest to the Proposed Development during the construction phase. The potential impact is detailed further in Section 5.5 of this report.

Landscape and Visual impacts are discussed further in Section 5.6. The change of use of the site from its existing use to that of a construction site will give rise to short term and substantially localised effects on landscape character.

In the absence of mitigation measures the potential impacts during the construction phase on populations and human health are ***negative***, ***not significant,*** and ***short term.***

Mitigations Measures

The potential short-term impacts during the construction will be mitigated in accordance with the measures set out in the CMP (TENT Engineering, 2024), and through implementation of binding hours of construction.

The CMP includes mitigation measures in the form of requirements and standards in relation to hazardous materials storage, dust generation, and construction noise and vibration, that will be met during the construction phase. All mitigation measures outlined within the CMP will be implemented, as well as any additional measures required pursuant to planning conditions which may be imposed.

Best practice control measures for noise and vibration from construction sites are found within BS 5228-1, these measures are outlined in the CMP (TENT Engineering, 2024).

All construction areas, including the proposed temporary construction compounds, will be suitably fenced, and access to the site will be limited to authorised personnel in the interest of public health and safety. Safe working practices, in accordance with the relevant legislation, will be in place during construction to protect the workers and visitors to the construction site.

Residual Impact

The residual impact of the Proposed Development with respect to population human health during the construction phase after the implementation of mitigation measures set out in this report, is ***negative***, ***not significant*** and ***short-term***.

The residual impact of the Proposed Development with respect to impacts from noise to population human health during the construction phase after the implementation of mitigation measures set out in this report, is ***negative***, ***moderate*** and ***short-term***.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of population and human health impacts during the construction phase. Therefore, a requirement for subthreshold EIA does not arise.

5.1.2 Operational Phase

Potential Impacts

Upon completion, the operational phase will provide an important material asset for the area in terms of high-quality residential accommodation. Adequate provision of high-quality housing to serve the existing and future population of the county is an important pre-requisite and contributor to the establishment and maintenance of good human / public health. The high quality design of the Proposed Development will contribute to a positive impact on the wellbeing of future residents.

The Proposed Development will not result in any off-site exceedance of the relevant ambient air quality standards . There are no planned direct discharges to water or land. There is limited potential for accidental discharges or spills to impact on the receiving River Dodder, as the stormwater drainage system includes a petrol interceptor immediately upstream of the site outfall.

Landscape and Visual impacts are discussed further in Section 5.6, it is considered that the design and landscaping proposals for the Proposed Development will complement the local landscape and visual environment.

In the absence of mitigation measures the potential impacts during the operation phase on population and human health are ***positive, not significant,*** and ***long term.***

Mitigation Measures

There are no significant impacts to populations and human health as a result of the operational phase of the Proposed Development therefore no mitigation is proposed.

Residual Impact

The residual impact of the Proposed Development with respect to populations and human health during the operational phase is ***positive***, ***not significant*** and ***long-term****.*

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of population and human health impacts during the operational phase. Therefore, a requirement for subthreshold EIA does not arise.

5.2 LAND, SOILS, GEOLOGY, HYDROGEOLOGY AND HYDROLOGY

5.2.1 Construction Phase

Potential Impacts

Potential for Impacts to Soil

The construction phase involves site levelling, construction, and installation of underground services, which require the excavation of soil and subsoils.

The physical disturbance of the land, including earthworks and excavations, can lead to soil erosion and degradation of soil structure. The excavation of soil and subsoils can destabilise the land, making it more susceptible to erosion.

Heavy machinery used during construction can compact the soil, reducing its porosity and permeability. Compacted soil impedes water infiltration, leading to increased surface runoff, higher erosion rates.

In the absence of mitigation measures the potential impacts during the construction phase on land, soils, geology, hydrogeology and hydrology with respect to soil are ***negative***, ***slight,*** and ***short term***.

Potential for Soil Contamination

There is a risk of soil contamination from potential leaks or spills of petroleum hydrocarbons and other pollutants during construction. Contaminants such as hydrocarbons can have long-lasting effects on soil health. Unmitigated leaks or spills of petroleum hydrocarbons, oils, paints, and cement may lead to contamination of soil, severely affecting its health and reducing its productive capacity. Contaminants such as hydrocarbons, which are known carcinogens in many animals and suspected to be carcinogenic to humans, can adversely impact soil and water quality.

In the absence of mitigation measures the potential impacts during the construction phase on land, soils, geology, hydrogeology and hydrology with respect to soil contamination are ***negative***, ***slight,*** and ***short term***.

Potential Impacts on Surface Water and Groundwater Quality

There is potential for the surface water quality to become contaminated with pollutants associated with construction activity. Spills can result in contaminated water and surface run-off, posing a short-term risk to nearby watercourses. Without mitigation, rainfall run-off during the construction phase may have increased silt levels or become polluted from construction activities.

The potential of contamination is associated with the following sources:

- Suspended solids (muddy water with increased turbidity (measure of the degree to which the water loses its transparency due to the presence of suspended particulates) – arising from dewatering, excavation and ground disturbance.
- Hydrocarbons and other construction chemicals (ecotoxic) – accidental spillages from construction plant or stored fuels, oils, and materials.
- Wastewater (nutrient and microbial rich) – arising from accidental discharge from on-site toilets and washrooms.

Suspended solids in runoff water may result in an increase in suspended sediment load, resulting in increased turbidity, which may in turn impact on local infiltration capacity, or downstream infrastructure or watercourses. There is also the potential risk of unintentional discharge from construction traffic, or stored materials like fuels and oils which could have negative impacts on both surface waters and the underlying groundwater.

Construction activities involve the use of chemicals, such as paints, adhesives, solvents, and pesticides, which can also pose a risk of contamination if not handled and disposed of properly. These chemicals can seep into the soil or be carried by rainwater or other runoff, ultimately contaminating surface water.

Concreting operations carried out near surface water drainage points during construction activities could lead to discharges to a watercourse. Concrete (specifically, the cement component) is highly alkaline and any spillage to a local watercourse would be detrimental to water quality and local fauna and flora.

Accidental discharges can also occur from welfare facilities during construction activities. Wastewater can contain high levels of bacteria, chemicals and organic matter, which could contaminate nearby water sources if discharged incorrectly. The establishment and use of welfare facilities and use of sealed containment, ensures that there are no potential significant impacts; therefore, no additional mitigation is required.

In the absence of mitigation measures the potential impacts during the construction phase on surface water and groundwater quality are ***negative***, ***slight*** and ***short term.***

Potential for Impacts on Hydromorphology (Surface Water Flow and Quantity)

The compaction of soils across the construction site as a result of the land clearing and earthworks will reduce the infiltration capacity and increase the rate and volume of direct surface run-off. The increase in the rate and volume of direct surface run-off (rainfall or dewatering) can result in increased sediment loading, scouring impacts local drainage and watercourse, and downstream impacts. This increased flow of potentially contaminated water which arises from construction can pose a risk to the Slang River via over-land flow.

With reference to Section 3.6 of this report and the FRA (TENT Engineering, 2024), the entirety of the Proposed Development lies within Flood Zone C. Nevertheless, construction works will not take place during extreme adverse weather conditions and flooding. There are no significant impacts as a result of flooding during the construction phase to people, property, the economy, and the environment.

Water will be required for welfare facilities, dust suppression and general construction activities, this will be provided by temporary connection to the existing services in the vicinity of the site. The construction phase will not use such a quantity of water to cause concern in relation to significant effects on the environment. There are no potential impacts on the quantity of surface water.

In the absence of mitigation measures the potential impacts during the construction phase on hydromorphology (Surface Water Flow and Quantity) are ***negative***, ***not significant,*** and ***short term.***

Potential for Impacts on Water Framework Directive Status

There is a potential of accidental discharges during the operational phase, however these are temporary short-lived events that will not impact on the WFD status in the long-term.

The Proposed Development will not impact on trends in water quality and overall WFD status assessment of the surface water body (Slang River (Dodder_050, EU_CD: IE_EA_09D010900), nor the groundwater body (Dublin (EU Code: IE_EA_G_008)). The Proposed Development will not cause a deterioration in status in any water body, and not prevent it from achieving 'Good Ecological Status' (GES) and 'Good Chemical Status' (GCS).

There is no potential impact on water framework directive status of the surface water bodies and groundwater bodies, therefore no specific mitigation measures are required.

Mitigation Measures

The contractor will be required to implement industry best practice pollution prevention measures in accordance with guidance documents (for example CIRIA Guideline Document C532 Control of Water Pollution from Construction Sites), during construction in order to control the risk of pollution to surface waters. These measures will be incorporated into the detailed CMP prepared for the site by the contractor.

Residual Impact

The residual impact (after the implementation of the CMP mitigation measures) during the construction phase on land, soils, geology, hydrogeology and hydrology are ***negative***, ***not significant***, and ***short term.***

The Proposed Development will not compromise progress towards achieving the WFD objective of 'good status' or cause a deterioration of the overall status of the water bodies that are in scope.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of land, soils, geology, hydrogeology and hydrology during the construction phase. Therefore, a requirement for subthreshold EIA does not arise.

5.2.2 Operational Phase

Potential Impacts

Potential Impacts on Surface Water and Groundwater Quality

There is potential for leaks or spills of petroleum hydrocarbons from vehicles accessing the site during operation of the development; unmitigated leaks or spills may lead to contamination of groundwater or surface water. These pollutants such as hydrocarbons that are a known carcinogen (cause cancer) in many animals and suspected to be carcinogenic to humans and changes in water pH in runoff water may result in adverse changes in water chemistry (dissolved oxygen content, biological oxygen demand etc). There are no discharges to ground included in the design. The surface water drainage design includes a Class 1 bypass separator upstream of the site's outfall.

In the absence of mitigation measures (or design measures) the potential impacts during the operational phase on land, soils, geology, hydrogeology and hydrology with respect to hydromorphology (surface water flow and quantity) are ***negative, slight,*** and ***long-term***.

Potential Impacts on Hydromorphology (Surface Water Flow and Quantity)

With reference to Section 3.6 of this report and the FRA (TENT Engineering, 2024), the subject site is located entirely within Flood Zone C i.e. i.e. the probability of flooding is low (less than 0.1% AEP or in 1 in 1000 year) for river flooding. In addition, the site is not at risk of coastal, pluvial or groundwater flooding. Historically, with reference to the OPW's past flooding records, the site has never experienced flooding of any kind. The development's drainage design includes for a 20% climate change allowance. The FRA concludes that the proposed site level (equal or higher than existing ground level) is above the level obtained for fluvial flood risk, tidal flood risk and climate change simulation.

In the absence of mitigation measures (or design measures) the potential impacts during the operational phase on land, soils, geology, hydrogeology and hydrology with respect to hydromorphology (surface water flow and quantity) are ***neutral***, ***imperceptible,*** and ***long-term***.

Potential Impacts on Water Framework Directive Status

There is a potential of accidental discharges during the operational phase, however these are temporary short-lived events that will not impact on the WFD status in the long-term.

The Proposed Development will not impact on trends in water quality and overall WFD status assessment of the surface water body (Slang River (Dodder_050, EU_CD: IE_EA_09D010900), nor the groundwater body (Dublin (EU Code: IE_EA_G_008)). The Proposed Development will not cause a deterioration in status in any water body, and not prevent it from achieving 'Good Ecological Status' (GES) and 'Good Chemical Status' (GCS).

There is no potential impact on water framework directive status of the surface water bodies and groundwater bodies, therefore no specific mitigation measures are required.

Mitigation Measures

The proposed surface water drainage system incorporates SuDS features including green roofing, blue roofing, permeable paving, tree pits, Aco-drains, an attenuation soakaway and Class 1 bypass separator.

Full detail on the surface water drainage system can be found in the Civil Planning Report (TENT Engineering, 2024) submitted with the Part 8 documentation.

Residual Impact

The residual impact on land, soils, geology, hydrogeology and hydrology during operation is considered to be ***neutral, imperceptible*** and ***long term***.

The Proposed Development will not compromise progress towards achieving the WFD objective of 'good status' or cause a deterioration of the overall status of the water bodies that are in scope.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of land, soils, geology, hydrogeology and hydrology during the operational phase. Therefore, a requirement for subthreshold EIA does not arise.

5.3 BIODIVERSITY

The following assessment of potential impacts in relation to biodiversity has been prepared with regard to the AA Screening Report (Open Field, 2024), EcIA (Open Field, 2024) and Bat Fauna Impact Assessment (Altemar, 2024) which have been submitted with the Part 8 documentation. Full detail on the assessment criteria, assessment methodologies and receiving environment in terms of biodiversity are provided in these reports.

5.3.1 Construction Phase

Potential Impacts

The potential impacts of the Proposed Development on biodiversity with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive may arise during the construction phase through: habitat loss, vegetation clearance, surface water runoff from soil excavation/infill/landscaping, dust, noise, vibration, lighting disturbance, impact on groundwater/dewatering, storage of excavated/construction materials, and introduction of pest species.

The EcIA of the site and environs has confirmed that there are no rare or protected habitats recorded in the study area inside the Proposed Development boundary. The development area may be considered of negligible to low local ecological value. There are no predicted emissions from dust, noise or to air or water that could have a significant effect on the European sites located in the potential Zone of Influence.

There will be removal of habitats including grassland and trees. These habitats are of low or negligible local biodiversity value. The loss of these features will result in negative effects to species which are common and widespread in the city and countryside. Loss of habitat will not affect the integrity of any species at a population level. Planting new trees and shrubs as part of a landscaping programme will ensure that in the longer term, habitats for common species will be retained.

There is a risk of direct mortality of species during construction. This impact is most acute during the bird breeding season which can be assumed to last from March to August inclusive. Vegetation on the site is suitable for nesting birds, particularly in trees and scrub. Any disturbance to nesting birds is an offence under the Wildlife Act. While Fox is not a protected species measures can and should be taken to avoid direct mortality.

There is potential for pollution of water courses through the ingress of silt, oils and other toxic substances. The potential for pollution of water courses during the construction phase is limited due to the absence of water courses within or in the immediate vicinity of the site.

Several trees of moderate bat roosting potential are proposed to be felled including an Ash Tree where a soprano pipistrelle roost is located. The removal of large trees on site will result in the loss of a confirmed bat roost in addition to reducing the sites foraging potential. Lighting during construction ad operation could potentially lead to impacts on foraging, however the lighting has been designed to minimise light spill onto treelines. It would be expected that bats would continue to forage on site. Mitigation is required in relation to bat roosting and lighting on site.

In the absence of mitigation measures the potential impacts during the construction phase on biodiversity are ***negative***, ***moderate,*** and ***short term.***

Mitigation Measures

Measures to prevent pollution of surface water will include storage of fuels and other dangerous substances in bunded areas and ensuring that sediment laden water does not enter surface sewers. Silt traps and/or settlement ponds will be used so that only clean water leaves the development stie.

Deliberate disturbance of a bird's nest is prohibited unless under licence from the National Parks and Wildlife Service (NPWS). Site clearance works, including removal of vegetation or felling of trees, should proceed outside the nesting season, i.e. from September to February inclusive. This measure will also ensure that Fox cubs, if breeding on the site, will not be entombed.

The following mitigation measures will be in place during the construction phase for the protection of bats, as set out in the Bat Fauna Impact Assessment (Altemar, 2024):

- A pre-construction inspection of trees to be felled will be carried out. A derogation licence will be acquired for the Ash tree with a confirmed bat roost;
- A pre felling inspection of the trees will be carried out by a bat specialist. If no bats are present during the inspection the tree will be felled in sections and lowered to the ground, where the sections will remain for 24 hours. If a bat is, or bats are, found, a specialist, licenced in manual handling of bats, will oversee the removal of the bat from the tree and the safe relocation of the bat to a suitable site within the site outline. This may include the placing or the bat in a cardboard box for release at night or placing the bat in a safe suitable temporary roosting location, depending on weather conditions;
- Lighting at all stages will be done sensitively on site with no direct lighting on perimeter treelines and will comply with the sensitive public lighting design. Lighting will follow the Bat Conservation Ireland "Bats & Lighting Guidance Notes for: Planners, engineers, architects and developers (December 2010);
- Lighting will comply with bat lighting guidelines;
- A post construction lighting assessment will be carried out by the project ecologist; and
- 3 Bat boxes will be placed on site in consultation with the project ecologist.

Residual Impact

On the basis of the foregoing, and with regard to the evidence set out within the EcIA, AA Screening Report and Bat Fauna Impact Assessment the potential effects on local biodiversity and ecology are ***negative, not significant,*** and ***short term*** for the construction phase.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of biodiversity during the construction phase. Therefore, a requirement for sub-threshold EIA does not arise.

5.3.2 Operational Phase

Potential Impacts

The potential impacts of the Proposed Development on biodiversity with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive may arise during the operational phase through: surface water runoff containing contaminants; lighting disturbance; presence of people, vehicles and activities; and potential for accidents or incidents.

There is potential for pollution of water from surface water run-off and foul wastewater. The Greater Dublin Strategic Drainage Study (2005) identified issues of urban expansion leading to an increased risk of flooding in the city and a deterioration of water quality. This arises where soil and natural vegetation, which is permeable to rainwater and slows its flow, is replaced with impermeable hard surfaces. The Proposed Development will include SUDS measures in order to maintain run-off at a 'greenfield' rate. Foul wastewater from the Proposed Development will be treated at Ringsend WWTP prior to discharge to Dublin Bay.

Increases in artificial lighting can affect biodiversity although little data is available for most species groups. Research has focussed on bats, which are sensitive to artificial lighting to varying degrees. For sensitive species, lighting can result in an effective loss of habitat or severing of foraging or commuting routes. This impact must be considered in the context of the existing surroundings which are already highly urbanized and lit with artificial lighting. The Proposed Development is not likely to increase the level of lighting over and above the background level.

The Proposed Development will change the local environment as new lights and structures are to be erected and the existing vegetation will be removed. Lighting during operation could potentially lead to impacts on foraging, however the lighting has been designed to minimise light spill onto treelines. Foraging activity on site may be reduced due to the presence new buildings and lighting. It would be expected that, with a sensitive public lighting strategy, foraging activity will continue on site.

In the absence of mitigation measures the potential impacts during the operation phase on biodiversity are ***negative, not significant,*** and ***long term.***

Mitigation Measures

The development during operation is considered to enhance the biodiversity in the area, as the existing site is not considered to be of significant ecological value. With reference to the Landscape Concept, (RMDA, 2024), the planting proposals include hedgerow bounding Block C to the north, shrubs bounding Blocks A and B and wildflower gardens.

As set out in the Bat Fauna Impact Assessment (Altemar, 2024), lighting at all stages will be done sensitively on site with no direct lighting on perimeter treelines and will comply with the sensitive public lighting design. Lighting will follow the Bat Conservation Ireland "Bats & Lighting Guidance Notes for: Planners, engineers, architects and developers (December 2010).

Residual Impact

The AA Screening (Open Field, 2024) concludes that, on the basis of the screening exercise carried out above, the possibility of any significant impacts on any Natura 2000 site, whether arising from the project itself or in combination with other plans and projects, can be ***excluded*** beyond a reasonable scientific doubt on the basis of the best scientific knowledge available. In reaching that conclusion, it was not necessary to consider any measures to avoid or reduce the impact of the Proposed Development.

On the basis of the above, and with regard to the evidence set out within the EcIA, AA Screening Report and Bat Fauna Impact Assessment, the potential effects on local biodiversity and ecology are ***negative, not significant,*** and ***long term*** for the operational phase.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of biodiversity during the operational phase. Therefore, a requirement for sub-threshold EIA does not arise.

5.4 AIR QUALITY AND CLIMATE

5.4.1 Construction Phase

Potential Impacts

Potential Impacts on Air Quality

The greatest potential impact on air quality during the construction phase of the Proposed Development is from construction dust emissions and the potential for nuisance dust and $PM_{10}/PM_{2.5}$ emissions. While construction dust tends to be deposited within 250 m of a construction site, the majority of the deposition occurs within the first 50 m based on the Institute of Air Quality Management (IAQM) guidance (2024). The extent of any dust generation depends on the nature of the dust (soils, peat, sands, gravels, silts etc.) and the nature of the construction activity. In addition, the potential for dust dispersion and deposition depends on local meteorological factors such as rainfall, wind speed and wind direction.

In the absence of mitigation measures the potential impacts during the construction phase on air quality are ***negative***, ***slight,*** and ***short term.***

Potential Impacts on Climate

Construction stage traffic and embodied energy of construction materials are expected to be the dominant source of greenhouse gas emissions as a result of the construction phase of the development. Construction vehicles, generators etc., may give rise to some CO_2 and N_2O emissions.

In the absence of mitigation measures the potential impacts during the construction phase on climate are ***negative***, ***not significant,*** and ***long term.***

Mitigation Measures

Air Quality

The pro-active control of fugitive dust will ensure the prevention of significant emissions, rather than an inefficient attempt to control them once they have been released. The key aspects of controlling dust are listed below. These measures will be incorporated into the detailed CMP prepared for the site.

In summary the measures which will be implemented will include:

- Hard surface roads will be swept to remove mud and aggregate materials from their surface while any un-surfaced roads will be restricted to essential site traffic.
- Any road that has the potential to give rise to fugitive dust will be regularly watered, as appropriate, during dry and/or windy conditions.
- Vehicles exiting the site will make use of a wheel wash facility where appropriate, prior to entering onto public roads.
- Vehicles using site roads will have their speed restricted, and this speed restriction must be enforced rigidly. On any un-surfaced site road, this will be 20 kph, and on hard surfaced roads as site management dictates.
- Public roads outside the site will be regularly inspected for cleanliness and cleaned as necessary.
- Material handling systems and site stockpiling of materials will be designed and laid out to minimise exposure to wind. Water misting or sprays will be used as required if particularly dusty activities are necessary during dry or windy periods.
- During movement of materials both on and off-site, trucks will be stringently covered with tarpaulin at all times. Before entrance onto public roads, trucks will be adequately inspected to ensure no potential for dust emissions.

At all times, these procedures will be strictly monitored and assessed. In the event of dust nuisance occurring outside the site boundary, movements of materials likely to raise dust would be curtailed and satisfactory procedures implemented to rectify the problem before the resumption of construction operations.

Climate

A range of mitigation measures will be employed to ensure that GHG emissions are minimized wherever possible during the construction phase. The measures will include:

- All vehicles will be required to switch off engines when stationary (no idling);
- All vehicles will be serviced and maintained to ensure emissions are minimised;
- Where practicable, materials will be reused within the extent of the Proposed Development; and
- Where practicable, materials will be sourced locally to reduce the embodied emissions associated with transport.

Residual Impact

The residual effects on air quality and climate will be ***short term, not significant*** and ***negative*** during the construction phase***.***

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of air quality impacts during the construction phase. Therefore, a requirement for sub-threshold EIA does not arise.

5.4.2 Operational Phase

Potential Impacts

Potential Impacts on Air Quality

In relation to the operational phase of the Proposed Development, the Proposed Development will not result in any significant emissions of air quality pollutants or greenhouse gases once operational. Therefore, the potential impact to air quality from the operational phase of the Proposed Development is expected to be imperceptible.

Once operational, the Proposed Development will provide a total of 65 no. car parking spaces, leading to additional traffic movements to and from the site. Engine emissions from vehicles accessing the site have the potential to impact air quality during the operational phase of the development through the release of NO_2, PM_{10} and $PM_{2.5}$.

Transport Infrastructure Ireland (TII) in their guidance document '*Air Quality Assessment of Specified Infrastructure Projects – PE-ENV-01106*' outline the below screening criteria for determining whether a detailed air impact assessment of traffic emissions is required for a project. Where traffic changes are below the following thresholds, no detailed assessment of traffic emissions is required and it is concluded there is no potential for significant impacts to air quality.

- Annual average daily traffic (AADT) changes by 1,000 or more;
- Heavy duty vehicle (HDV) AADT changes by 200 or more;
- Daily average speed change by 10 kph or more;
- Peak hour speed change by 20 kph or more;
- A change in road alignment by 5m or greater.

The operational phase traffic will not meet any of the above criteria and therefore, a detailed assessment of traffic emissions is not required. There is no potential for significant impacts to air quality from operational traffic emissions.

In the absence of mitigation measures (or design measures) the potential impacts during the operational phase on air quality are ***neutral***, ***imperceptible, long-term*** and ***not significant***.

Potential Impacts on Climate

The operational phase of the Proposed Development will not cause a significant impact to climate and will not contribute towards emissions and Ireland's ability to meet the national 2030 carbon budgets and sectoral emissions ceilings set out within the Climate Action and Low Carbon Development (Amendment) Act 2021 (No. 32 of 2021) and Climate Action Plan.

In addition to GHG emissions and impacts to climate, the "*Guidelines on the Information to be Contained in Environmental Impact Assessment Reports*" (EPA 2022) states that impacts relevant to adaptation to climate change should be assessed and that projects should be assessed in terms of their vulnerability to climate change. The Proposed Development has been designed to accommodate future climate

change and potential climate change related hazards where required. Therefore the Proposed Development is not predicted to be vulnerable to future climate change.

In the absence of mitigation measures (or design measures) the potential impacts during the operational phase on climate are ***neutral***, ***imperceptible, long-term*** and ***not significant***.

Mitigation Measures

As the identified impacts with regard to air quality and climate during the operational phase of the Proposed Development will be imperceptible, there is no requirement for operational mitigation measures.

Residual Impact

On the basis of the above the residual effects on air quality and climate are ***neutral***, ***imperceptible,*** and ***long term*** for the operational phase.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of air quality impacts during the operational phase. Therefore, a requirement for sub-threshold EIA does not arise.

5.5 NOISE AND VIBRATION

5.5.1 Construction Phase

Potential Impacts

During the construction phase it is expected that there will be a short term noise impact on the nearest residential properties due to noise emissions from the plant equipment required for construction. A variety of items of plant will be in use for the purposes of site clearance/groundworks, and construction. There will be vehicular movements to and from the site that will make use of existing roads. Due to the nature of these activities, there is potential for the generation of elevated levels of noise. The Proposed Development is not anticipated to give rise to any significant levels of vibration.

The nearest sensitive receptors to the Proposed Development are the Churchfields residences located at the closest point c. 10m to the east of the site and c. 50m to the north, residences located along the Dundrum Road c. 15m to the west of the site, and the Hawthorn Meadows residences c. 40m to the southeast. There is therefore potential for elevated levels of noise to impact on these sensitive receptors. However, it should be noted that these elevated noise levels will be temporary events, occurring only when noisier activities are taking place intermittently throughout the construction phase. These temporary events will lessen as the works move away from the eastern and southern boundaries of the site.

In the absence of mitigation measures the potential impact during the construction phase due to noise and vibration is ***negative***, ***moderate,*** and ***short term.***

Mitigation Measures

With regard to construction activities, best practice control measures for noise and vibration from construction sites are found within BS 5228-1. Whist construction noise

and vibration impacts are expected to vary during the construction phase depending on the distance between the activities and noise sensitive buildings, the contractor will ensure that all best practice noise and vibration control methods will be used, as necessary in order to ensure impacts at off-site noise sensitive locations are minimised. The best practice measures set out in BS 5228-1 and BS 5228-2 include guidance on several aspects of construction site mitigation measures.

The relevant mitigation measures are set out and detailed fully in the CMP (TENT Engineering, 2024) including, but not limited to:

- Selection of quiet plant;
- Noise control at source;
- Screening, and;
- Liaison with the public.

Residual Impact

The residual noise and vibration effects on the environment following the implementation of the construction mitigation measures, as set out in the CMP, and taking into account the transient nature of noise generated by the works onsite and varying distances to sensitive receptors as works are concentrated in different areas of the site, can be characterised as ***negative***, ***moderate,*** and ***short term*** for the construction phase.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of noise and vibration impacts during the construction phase. Therefore, a requirement for sub-threshold EIA does not arise.

5.5.2 Operational Phase

Potential Impacts

A range of mechanical plant items will be required to service the development. While the specific details of the plant items would normally be confirmed at the detail design stage of a project, typically for residential developments there may be a requirement to provide mechanical plant for ventilation, heating and cooling purposes.

Once operational, the Proposed Development will provide a total of 65 no. car parking spaces, leading to additional traffic movements to and from the site. This additional vehicular traffic will generate additional noise on public roads.

In the absence of mitigation measures (or design measures) the potential impacts during the operational phase on noise and vibration are ***negative, not significant,*** and ***long term.***

Mitigation Measures

As the identified impacts with regard to noise and vibration during the operational phase of the Proposed Development will not be significant, there is no requirement for operational mitigation measures.

Residual Impact

The residual effects on noise and vibration are ***negative, not significant***, and ***long term*** for the operational phase.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of noise and vibration impacts during the operational phase. Therefore, a requirement for sub-threshold EIA does not arise.

5.6 LANDSCAPE AND VISUAL IMPACT

5.6.1 Construction Phase

Potential Impacts

The change of use of the site from its existing use to that of a construction site will give rise to short term and substantially localised effects on landscape character. The initial construction operations created by the clearance of the site and the construction of the buildings and plant will give rise to short-term impacts on the landscape character, through the introduction of new structures, machinery, ancillary works etc. There will also be a change to the landscape character as a result of a land-use change.

In the absence of mitigation measures the potential impacts during the construction phase on landscape and visual impact are ***negative***, ***not significant,*** and ***short term***.

Mitigation Measures

Hoarding will be in place around the perimeter of the site during the construction phase. No further mitigation with regard to landscape and visual impacts is required as the anticipated impact is not significant.

Residual Impact

The residual impact on landscape and visual impact during construction will be ***short term*** and will be ***not significant*** and ***negative***.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of landscape and visual impacts during the construction phase. Therefore, a requirement for sub-threshold EIA does not arise.

5.6.2 Operational Phase

Potential Impacts

The Proposed Development is a greenfield site, which is currently not in use, and is zoned for the provision of residential development. The lands surrounding the Proposed Development predominantly consist of residential estates and green open spaces. Therefore, the change in landscape associated with the Proposed Development will be in keeping with both the zoning of the lands and the landscape of the surrounding environs.

In the absence of mitigation measures (or design measures) the potential impacts during the operational phase on landscape and visual impact are ***neutral***, ***imperceptible,*** and ***long term***.

Mitigation Measures

It is considered that the design and landscaping proposals for the Proposed Development will complement the local landscape and visual environment. The landscape design seeks to add additional vegetation whilst implementing amenity space, including a natural play space and calisthenics space, both located in the northeast of the site, and creating connections with public open space to the north of the site. The proposed planting is further detailed in the Landscape Concept (RMDA, 2024).

Residual Impact

The residual impact on landscape and visual impact is ***positive, not significant*** and ***long term***.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of landscape and visual impacts during the operational phase. Therefore, a requirement for sub-threshold EIA does not arise.

5.7 ARCHAEOLOGY, ARCHITECTURE AND CULTURAL HERITAGE

5.7.1 Construction Phase

Potential Impacts

A review of the Heritage Council's online database (https://heritagemaps.ie/) determined that there are no recorded archaeological sites or monuments within the Proposed Development lands. In addition, a review of the Dún Laoghaire Rathdown County Development Plan 2022-2028 confirms that there are no protected structures within the Proposed Development lands. The Proposed Development site does not lie within the zone of notification for any recorded monuments. Directly to the north of the site, within the Applicant's ownership boundary, Emmet House is listed on the Record of Protected Structures (RPS no. 18).

The Proposed Development will comprise ground disturbance in the installation of services and construction of buildings and foundations. As the site is greenfield in nature, it has not been subject to ground disturbance in the recent past. There is therefore some potential for these activities to have an adverse impact on previously unrecorded archaeological remains.

In the absence of mitigation measures the potential impacts during the construction phase on archaeology, architectural and cultural heritage are ***negative***, ***not significant,*** and ***permanent***.

Mitigation Measures

The potential impacts with regard to archaeology, architectural and cultural heritage during the construction phase of the Proposed Development will not be significant, there is no requirement for construction mitigation measures.

Residual Impact

The residual effects on archaeology, architectural and cultural heritage will be ***negative, not significant*** and ***permanent*** during the construction phase***.***

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of cultural heritage and archaeology during the construction phase. The residual effect is not significant, and therefore a requirement for sub-threshold EIA does not arise.

5.7.2 Operational Phase

Potential Impacts

There will be no ground disturbance during the operational phase of the Proposed Development. There are no recorded archaeological or architectural heritage features which will be impacted on by the Proposed Development. Emmet House, the RPS structure located north of the Proposed Development will not be impacted negatively. The public open space in the north of the Proposed Development lands will provide high quality greenway connectivity to Emmet House.

In the absence of mitigation measures (or design measures) the potential impacts during the operational phase on archaeology, architectural and cultural heritage are ***neutral***, ***imperceptible,*** and ***permanent***.

Mitigation Measures

The potential impacts with regard to archaeology, architectural and cultural heritage during the operational phase of the Proposed Development will be imperceptible, there is no requirement for operational mitigation measures.

Residual Impacy

The residual impact on archaeology, architectural and cultural heritage during operation is considered to be ***neutral, imperceptible*** and ***permanent.***

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of cultural heritage and archaeology impacts during the operational phase. Therefore, a requirement for sub-threshold EIA does not arise.

5.8 TRAFFIC AND TRANSPORTATION

The following assessment of potential impacts in relation to traffic and transportation has been prepared with regard to the Traffic and Transport Assessment (TENT Engineering, 2024) which has been submitted with the Part 8 documentation. Full detail on the assessment criteria, assessment methodologies and receiving environment in terms of traffic are provided in this report.

5.8.1 Construction Phase

Potential Impacts

During the construction phase of the Proposed Development, there will be additional traffic movements to/from the site from construction personnel, security staff, professional staff (i.e. design team, utility companies), excavation plant, dumper trucks and deliveries/removal of materials (waste/spoil).

As outlined in the CMP prepared by TENT Engineering (2024) and submitted with the Part 8 documentation, construction traffic access to the site will be via the Dundrum Road to the west of the site. Advanced warning will be provided to all users on the road and directional signage will be in place for site traffic

All deliveries to site will be scheduled to ensure their timely arrival and avoid the need for storing large quantities of materials on site. Deliveries will be scheduled outside of rush hour traffic to avoid disturbance to pedestrian and vehicular traffic in the vicinity of the site.

Due to the location and nature of access to the site, there will be limited site parking or construction parking anywhere in the vicinity of the site. Nearby off-site car parking will be identified to avoid congestion in the surrounding areas. Construction staff will be encouraged to use public transport and information on local transportation will be published on site.

In the absence of mitigation measures the potential impacts during the construction phase on traffic and transportation are ***negative***, ***not significant,*** and ***short term***.

Mitigation Measures

The frequency of vehicles accessing the site will vary throughout the construction phase. A site-specific Construction Traffic Management Plan incorporating the mitigation measures set out under the CMP (TENT Engineering, 2024) will be prepared by the contractor, in consultation with the design team and DLRCC, and submitted to the planning authority prior to the commencement of construction.

Residual Impact

After the implementation of mitigation measures the residual impact on Traffic and Transportation are ***negative*****,** ***not significant*****,** and ***short term*** for the construction phase.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of traffic and transportation impacts during the construction phase. Therefore, a requirement for sub-threshold EIA does not arise.

5.8.2 Operational Phase

Potential Impacts

There will be an increase in traffic owing to resident and visitor movements to and from the site once the Proposed Development is operational. The Proposed Development will be provided with one vehicle access point from the Dundrum Road to the west of

the site. A total of 65 no. car parking spaces will be provided at surface level, including 12 no. Electric Vehicle charging spaces and 3 no. accessible spaces.

As outlined in the Traffic and Transportation Assessment (TENT Engineering, 2024), assuming the 65 no. car spaces added with the Proposed Development generate 65 additional PCUs during the peak periods, of which 32 travel south and 33 travel north, the impact on this development is calculated to be 0.51% traveling south and 0.44% traveling north at peak times. In summary, the Proposed Development is considered to have a negligible impact on Dundrum Road based on the worst-case assumptions set out above.

The Proposed Development provides a total of 154 no. bicycle parking spaces, comprising 129 no. long-term spaces, which include 4 no. e-bike and 4 no. cargo bike spaces, along with 25 no. visitor spaces. Each unit with ground-floor access is also allocated a private bike space. This provision is considered sufficient to meet the bicycle parking needs of the development.

The Proposed Development will also make use of the public transport services in the vicinity. There are various public transport options available, with Dublin Bus Routes 44, 44D and S4, all operating within a 600m radius of the Proposed Development site. The Luas Green Line is accessible from the Milltown stop, located c. 15 minutes walking distance west of the site.

In the absence of mitigation measures (or design measures) the potential impacts during the operational phase on traffic and transportation are ***negative***, ***not significant,*** and ***long term***.

Mitigation Measures

An outline Mobility Management Plan (TENT Engineering, 2024) has been submitted with this Part 8 application. The MMP outlines the measures which will be implemented onsite when operational to promote walking, cycling and use of public transport.

As the identified impacts with regard to traffic and transportation during the operational phase of the Proposed Development will be insignificant, there is no requirement for further operational mitigation measures.

Residual Impact

On the basis of the above the residual effects on Traffic and Transportation are considered to be ***negative***, ***not significant***, and ***long term*** for the operational phase.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of traffic and transport impacts during the operational phase. Therefore, a requirement for sub-threshold EIA does not arise.

5.9 MATERIAL ASSETS AND WASTE

5.9.1 Construction Phase

Potential Impacts

Waste and Waste Management

There will be some waste materials produced in the construction of the proposed scheme which will be disposed of using licensed waste disposal facilities and contractors. Other than waste generated from materials necessary for the construction of the building the Proposed Development will not produce significant volumes of waste. The scale of the waste production in conjunction with the use of licensed waste disposal facilities and contractors does not cause concern for likely significant effects on the environment.

In the absence of mitigation measures the potential impacts during the construction phase on waste management are ***negative***, ***significant,*** and ***short term***.

Utilities

Welfare facilities (canteens, toilets etc.) will be available within the construction compound on site. Portable sanitary facilities will be provided via temporary connection to the existing services on site until the connection to the existing foul sewer is in place.

Electrical connections will be made by suitably qualified personnel following consultation with the relevant authorities and will be cognisant of subsequent construction works. High voltage connections will be established for heavy duty equipment and site facilities, as required. The power and electrical supply requirements during construction are relatively minor, and there is no potential impact anticipated on existing users

Water will be required for welfare facilities, dust suppression and general construction activities, this will be provided by temporary connection to the existing services on site. The construction phase will not use such a quantity of water to cause concern in relation to significant effects on the environment.

In the absence of mitigation measures the potential impacts during the construction phase on utilities are ***negative***, ***not significant,*** and ***short term***.

Mitigation Measures

Waste Management

All waste arising during the construction phase will be managed and disposed of in a way that ensures the provisions of the *Waste Management Act 1996* as amended and associated amendments and regulations and the *National Waste Management Plan for a Circular Economy 2024 – 2030* (2024). In the event there is excess material with no defined purpose, it will be transported to an authorised soil recovery site or notified to the EPA as a by-product when it will be beneficially used. Waste during construction will be managed in accordance with a project specific RWMP prepared by the contractor, as well as any subsequent planning conditions.

Utilities

No silty or contaminated water from the construction works will be discharged to any open river or stormwater network. The detailed CEMP produced by the contractor must outline procedures for the control, treatment and disposal of potentially contaminated surface water including monitoring systems and oversight required throughout the construction phase.

All electrical works, including connection to the ESB network will be carried out by a suitably qualified contractor.

Residual Impact

The residual impact on waste management during construction is considered to be ***neutral, imperceptible,*** and ***short term***.

The residual impact on utilities during construction is considered to be ***neutral, imperceptible,*** and ***short term***.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of material assets impacts during the construction phase. Therefore, a requirement for sub-threshold EIA does not arise.

5.9.2 Operational Phase

Potential Impacts

Waste and Waste Management

The Proposed Development will give rise to a variety of waste streams during the operational phase, i.e., when the project is completed, and residents are generating waste on a daily basis. The potential impacts on the environment of improper, or a lack of, waste management during the operational phase would be a diversion from the priorities of the waste hierarchy which would lead to small volumes of waste being sent unnecessarily to landfill.

In the absence of mitigation measures (or design measures) the potential impacts during the construction phase on waste management are ***negative***, ***not significant,*** and ***long term***.

Utilities

Water will be supplied to the Proposed Development via connection to the existing public watermain located to the east of the site in the Churchfields estate. To the west of the site, off Dundrum Road, there is an fire hydrant connect to the existing watermain. Two fire hydrants will be installed on-site to ensure adequate coverage in the event of an emergency.

Wastewater from the Proposed Development will connect to the existing public wastewater sewer located to the east of the site in the Churchfields estate, to be ultimately treated at Ringsend WWTP.

A Pre-connection Enquiry was submitted to Uisce Éireann (UÉ) to determine the feasibility of connecting to the public water supply and foul water drainage infrastructure. At the time of writing, a response has not yet been received from UÉ.

Stormwater from the Proposed Development will drain to the existing public stormwater sewer located to the east of the site in the Churchfields estate, ultimately discharging to the River Dodder. The proposed surface water drainage system incorporates SuDS features including green roofing, blue roofing, permeable paving, tree pits, Aco-drains, an attenuation soakaway and Class 1 bypass separator. Full detail on the SuDS features can be found in the Civil Planning Report (TENT Engineering, 2024).

In the absence of mitigation measures (or design measures) the potential impacts during the operational phase on traffic and transportation are ***neutral***, ***imperceptible,*** and ***long term***.

Mitigation Measures

Waste Management

An Operational Waste Management Plan has been prepared by AWN, which outlines to maximise the quantity of waste recycled by providing sufficient waste recycling infrastructure, waste reduction initiatives and waste collection and waste management information to the residents of the development. Waste will be managed in accordance with the current legal and industry standards including the *Waste Management Act 1996* as amended and associated Regulations, *Environmental Protection Agency Act 1992* as amended, *Litter Pollution Act 1997* as amended and the *National Waste Management Plan for a Circular Economy 2024 – 2030* (2024).

A collection permit to transport waste must be held by each waste contractor which is issued by the NWCPO. Waste receiving facilities must also be appropriately permitted or licensed.

Utilities

As the identified impacts with regard to utilities during the operational phase of the Proposed Development will be imperceptible, there is no requirement for operational mitigation measures.

Residual Impact

The residual impact on waste management during operation is considered to be ***neutral, imperceptible,*** and ***long term***.

The residual impact on utilities during operation is considered to be ***neutral, imperceptible,*** and ***long term***.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of material assets impacts during the operational phase. Therefore, a requirement for sub-threshold EIA does not arise.

5.10 ASSESSMENT OF POTENTIAL IMPACTS FROM INTERACTIONS

This section discusses the potential interactions and inter-relationships between the environmental factors discussed in the preceding sections. This section covers the construction, operational and decommissioning phases of the Proposed Development.

In accordance with the guidance not only are the individual significant impacts required to be considered when assessing the impact of a development on the environment, but so must the interrelationships between these factors be identified and assessed.

The majority of the interactions that are considered to have a neutral effect (i.e., no effects or effects that are imperceptible, within the normal bounds of variation or within the margin of forecasting error).

The interaction of the foregoing impacts, described above, would not give rise to any significant negative impacts on the environment. There is a potential interaction between land, soil geology, hydrogeology and hydrology through poorly managed surface water run-off during the construction phase of the Proposed Development that in the absence of mitigation measures could negatively impact on biodiversity. There is a potential for the construction activity in terms of air quality and of dust generated to impact on human health and biodiversity. There is a potential interaction between noise and vibration, and negative impacts on human health.

However, these potential interactions are short-term and associated with the construction phase. The CMP (TENT Engineering, 2024) has outlined mitigation measures to ensure that pollution and nuisances arising from site clearance and construction activities is prevented where possible and managed in accordance with best practice and any subsequent planning conditions relevant to the Proposed Development .

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the interactions. Therefore, a requirement for EIA does not arise.

5.11 ASSESSMENT OF POTENTIAL FOR CUMULATIVE IMPACTS

As part of the assessment of the Proposed Development, the likelihood of potential cumulative impact of the Proposed Development has been considered with any future development (as far as practically possible) and the cumulative impacts with developments in the locality (including planned and permitted developments).

The National Planning Application Map was consulted for the previous 5 years to identify notable applications (Proposed Development), or applications granted permission (permitted development) within that period within 500m of the development site. The National Planning Application Map includes planning application data sourced from the 31 individual local authorities across Ireland. This list of consented development is shown in Appendix A at the end of this report. The review of the online planning tool noted a large number of insignificant small extensions, changes of use, retention and other minor alterations in the vicinity of the Proposed Development. These proposed and consented development have been, where relevant, considered as a part of the overall project impact.

Cumulative impacts are those impacts that relate to incremental / additive impacts of the planned development in addition to historical, present or foreseeable future actions. Cumulative impacts can be thought of as occurring through two main pathways: first, through persistent additions or losses of the same materials or resource, and second, through the compounding effects as a result of the coming together of two or more effects.

Mitigation is included in the project design to minimise impacts on the receiving environment. Each project currently permitted in the wider area is subject to planning conditions which include appropriate mitigation measures to minimise environmental impacts. Provided that mitigation measures for other developments are implemented as permitted, there will be no significant cumulative effects.

Any future development will be required to incorporate appropriate mitigation measures (e.g. noise management, dust management, traffic management, management of water quality in run-off water, landscape, etc) during the construction

phase as such any cumulative development will not have a significant effect on human health, material assets, land, soils, geology, hydrogeology, and hydrology.

Any future development proposed on the surrounding lands should be cognisant with the zoning and will be subject to EIA and/or planning conditions which include appropriate mitigation measures to minimise environmental impacts.

Based on the assessment of the environmental sensitivities in the existing environment and consideration of potential cumulative impacts, it is concluded that there are no likely cumulative environmental impacts which would warrant preparation of an EIA.

6.0 FINDINGS AND CONCLUSIONS

The purpose of this EIA Screening Report has been to consider whether there is a requirement for the preparation of an Environmental Impact Assessment Report (EIAR) to accompany the Part 8 application to Dún Laoghaire Rathdown County Council ('DLRCC') for the Proposed Development.

The Proposed Development and component parts have been considered against the thresholds outlined in Schedule 5 in the Planning and Development Regulations 2001 (as amended). On the basis of the evaluation set out in Section 2.0 an EIA for the proposed Project is not mandatory; the proposed project is considered to be a sub-threshold development and therefore there is discretion over the submission of an EIAR with the Part 8 application.

DLRCC is required to assess whether the Proposed Development is likely to have significant effects on the environment in order to determine whether the submission of an EIA Report is required. The information necessary to enable this screening assessment has been provided in this report and the methodology used has been informed by the available guidance, legislation and Directives.

It is concluded, based on the evidence documented in Sections 3.0, 4.0 and 5.0, that having regard to the nature, scale and location of the subject site, there is no likelihood of significant effects on the environment arising from the Proposed Development on the environment (direct, indirect or cumulatively with other development) and therefore it is considered that an Environmental Impact Assessment Report (EIAR) is not required in this instance.

7.0 REFERENCES

Bat Fauna Impact Assessment for Proposed Residential Development at Mount Saint Mary's, Dundrum Road, Dublin. Altemar. 2024.

Department of Housing, Planning and Local Government. Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment. DHPLG: 2018.

Ecological Impact Statement for a Proposed Development at Mount St Mary's, Dundrum Road, Dublin 14. Open Field Ecological Services. 2024.

Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report, European Commission, 2017 http://ec.europa.eu/environment/eia/eia-support.htm

Environmental Impact Assessment Screening, OPR Practice Note PN02 (Office of the Planning Regulator, 2021).

Environmental Protection Agency. Guidelines on the Information to be contained in Environmental Impact Assessment Reports. EPA 2022.

European Union. Environmental Impact Assessment of Projects Guidance on Screening. EU Luxembourg: 2017.

European Union. Guidance on the preparation of the Environmental Impact Assessment Report. EU Luxembourg: 2017.

Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes. Transport Infrastructure Ireland (2011).

Mount Saint Mary's Civil Planning Report. TENT Engineering. 2024.

Mount Saint Mary's Flood Risk Assessment. TENT Engineering. 2024.

Mount Saint Mary's Outline Construction Management Plan. TENT Engineering. 2024.

Mount Saint Mary's Outline Mobility Management Plan. TENT Engineering. 2024

Mount Saint Mary's Traffic and Transport Assessment. TENT Engineering. 2024.

Operational Waste Management Plan for a Proposed Residential Development Mount Saint Marys. AWN Consulting. 2024.

Residential Development at Mount Saint Mary's, Dundrum Dublin 14, Landscape Concept. Ronan Mac Diarmada & Associates. 2024

Screening Report for Appropriate Assessment of development at Mount St Mary's, Dundrum Road, Dublin 14. Open Field Ecological Services. 2024.

APPENDIX A - RELEVANT PLANNING HISTORY

Application Number	Development Description	Development Address	Decision	Grant Date
3679/24	Permission for development at this site within the Alexandra College Campus (6,4317 ha.) Richmond Avenue South, Milltown, Dublin 6, D06 KX50. The campus is principally bounded by Mount Saint Annes to the north; partly by Mount Saint Annes and Milltown Road to the east, Milltown Road to the south and by Richmond Avenue south and the green line LUAS track to the west. The development will consist of the full renovation and upgrading to the existing dining hall building (509 sqm) and the construction of a new single storey extension (231 sqm) to provide additional dining hall space for the school, located on a site of c. 0133 ha within the campus. The following works area proposed : installation of new gazing and upgrading of the fabric of the existing facades and roof of the Dining Hall; provision of new toilets (20sqm), additional dining area and sundry internal reconfigurations to the kitchen and servery; replacement of existing mechanical plant and a new uncovered plant enclosure at roof level (113 sqm); adjustment of existing adjacent parking layout; wayfinding signage and external lighting hard and soft landscaping in the immediate vicinity and all associated site excavation, utilities and site development works above and below ground (foul, surface water drainage and water supply). The works also include the demolition of a link corridor (47 sqm) between the existing dining hall building dormitory/ classroom building; the extension of the entrance lobby to include fire escape doors and the installation of double doors between the dining hall and dormitory/classroom building.	Alexandra College, Richmond Avenue South, Milltown, Dublin 6, D06 KX50	Grant Permission	27 Aug 2024 (Decision Date)
4578/22	Planning permission for a Build to Rent residential development on lands at 'Dunelm', Rydalmount, Milltown Road, Dublin 6. The site is located to the east of the Green Luas line, to the south of residential dwellings at No's 1 and 2 Rydalmount and east of the residential dwelling known as 'Kadiv' at Rydalmount, Milltown Road. The proposed Build to Rent residential development will consist of the following: • Demolition of the existing building (comprising the residential dwelling known as 'Dunelm') and structures on site; • Construction of a Build-to-Rent (BTR) residential development, comprising 63 no. BTR apartments with a mix of 5 no. studio units, 27 no. 1 bed units, 30 no. 2	'Dunelm', Rydalmount, Milltown Road, Dublin 6	Grant Permission	18 Jan 2024

Application Number	Development Description	Development Address	Decision	Grant Date
	bed units and 1 no. 3 bed unit in two no. blocks (Block A and Block B), including resident support and amenity facilities; • Block A, to the south of the site, comprises 55 no. BTR units, including 1 no. studio, 27 no. 1 bed units, 26 no. 2 bed units and 1 no. 3 bed units, in a part 4 to part 6 storey, over lower ground floor and basement level building (maximum of eight levels to Milltown Road). Resident support and amenity facilities are proposed at basement, ground and fifth floor level. Balconies are proposed on the northwest, southwest, southeast and northwest elevations; • Block B, to the northwest of the site, comprises 8 no. BTR units, including 4 no. studio units and 4 no. 2 bed units, in a 4 storey building. Balconies are proposed on the south, east and north elevations. Block A and Block B will be connected by a bridge link at first to third floor level; • The development includes ancillary resident support and amenity facilities for the BTR residential units, with a total floor area of 252.5 sq.m, including a large item storage area and a bike and bin store at basement level, concierge/management area and foyer area at ground floor level and lounge/ residential function room at fifth floor level all within Block A and a pavilion communal amenity building to the north of Block A; • The proposal includes communal open space at ground level and a communal roof terrace at fifth floor level of Block A; • The basement level (Block A) contains 10 no. car parking spaces, 1 no. motorcycle space, 6 no. e-scooter spaces and 98 no. cycle spaces (including 2 no. cargo spaces). The basement level also includes bin storage, a storage room for apartments and cores. A generator room, sprinkler tank room and water storage tank room are proposed at lower ground floor level; • The proposal includes 32 no. cycle parking spaces and 2 no. car parking spaces at surface level, accessed from the existing access road and a new vehicular access to the basement level from Milltown Road; • The proposal includes associated public realm works to Milltown Road, including alterations to the existing footpaths/ public road, a new signalised junction incorporating advanced cycle stacking lanes in the westbound direction, set back of the existing road median, provision of a new signalised pedestrian crossing of Milltown Road, provision of an uncontrolled pedestrian crossing of the development access junction and associated signals, tactile paving and road markings; • The proposal includes an ESB substation and associated set down area, landscaping, boundary treatment, PV panels, green roofs and a plant enclosure at			

Application Number	Development Description	Development Address	Decision	Grant Date
	roof level, site services and all associated site works necessary to facilitate the development.			
D22A/0464 / ABP-314962-22	Permission for development. The development will consist of the construction of a new three bedroom two storey, detached dwelling of 145M² floor area, in the rear garden of the existing house along with all ancillary and landscape works including a new separating boundary wall. The works will also include the demolition of an existing 10M² single storey garage structure as well as the removal of a section of the existing boundary wall to Churchtown Avenue. A new vehicular entrance and car port accommodating two car parking spaces is proposed which will be accessible off Churchtown Avenue. A pedestrian gate to the garden is also proposed along Churchtown Avenue.	Site to the rear and side of 27 Churchtown Road Lower, Dublin 14, D14 KX39	Grant Permission	06 Dec 2023
D22A/0321	Permission is sought for: The development will consist of the modification to existing granted permission (reference: D19A/0013) consisting of minor elevational changes and revised access to the rear garden of unit 4 at lands immediately south.	18, Dundrum Road, Dublin	Grant Permission	11 Aug 2022
D21A/0930	Permission sought for two storey dwelling house at side garden of existing house, including new vehicular entrance at front and all associated works and services	1, Saint Gall Gardens North, Milltown, Dublin 14, D14K062	Grant Permission	05 May 2022
D21A/0498	Permission for development. The development will consist of: 1) alterations to the front and side of the existing house at 5 Churchtown Avenue; 2) the construction of 1 no. one and two storey three bedroom detached house (160 sq.m.) and 1 no. one and two storey four bedroom detached house (209 sq.m) and; 3) all other site development works required to facilitate the development including internal access ways, boundary treatments, and hard and soft landscaping	c.0.211 ha site at, 5, Churchtown Ave, Rathmines Gt, D 14	Grant Permission	16 Dec 2021
D21A/0160	Permission for amendments to previous planning permission reference ABP-300519-17. The proposed amendments include realignment of entrance driveway, relocation of development signage and proposed pedestrian gate on the Dundrum road and amendments to the boundary wall between Chandos and the 6no. proposed dwellings. Works also include amendments to the proposed entrance gate for chandos off the entrance driveway including the provision of set black gates.	Chandos, Dundrum Road, Milltown, Dublin 14, D14R1W1	Grant Permission	28 Oct 2021

Application Number	Development Description	Development Address	Decision	Grant Date
D20A/0674	Permission for development. The development will consist of: 1. The demolition of the existing single storey dwelling, ancillary buildings, existing boundary wall along Bird Avenue and complete removal of existing vegetation within the confines of the site. 2. Construction of 2no. semi detached new part 3-storey , part 2-storey dwellings measuring a gross internal floor area of 220m2 per dwelling. Each dwelling comprises 4no. bedrooms, living, kitchen, WC's and associated utility accommodation. 3. Relocation of existing entrance to site to provide 2no. new site entrances, hard landscaped entrance forecourt and 2no. off street parking spaces per dwelling. 4. New boundary treatment to existing boundaries. 5. All associated site services, drainage installations, external lightning and landscaping to be carried out in conjunction with works.	Rose Cottage, Bird Avenue, Dublin 14, D14A3Y1	Grant Permission	28 Jan 2021