

Environmental Impact Assessment Screening Report

In respect of:

A Strategic Housing Development
at Sommerville House, Dundrum Road,
Dundrum, Dublin 14

Prepared on behalf of

Eir (formerly Eircom)

March 2022

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1. INTRODUCTION

This EIA Screening Assessment has been prepared to assist An Bord Pleanála in making a determination in respect of the necessity or otherwise for an Environmental Impact Assessment (EIA) to be undertaken and for an Environmental Impact Assessment Report (EIAR) to be prepared in respect of the proposed development.

This EIAR Screening Report must be read in conjunction with the Statement prepared in accordance with Article 299B (1)(b)(ii)(II)(C) of the Planning and Development Regulations 2001 to 2021 (hereafter referred to as the 'Planning Regulations'). The Statement forms part of the suite of information provided by the applicant to enable the Board to undertake a screening determination in accordance with Articles 299B and 299C of the Planning Regulations. In particular, the submitted Statement sets out *'the available results, where relevant, of preliminary verifications or assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive'* in accordance with Article 299C(1)(a)(iv) of the Planning Regulations to inform the screening determination by the Board.

1.1 About the Authors

This Environmental Impact Assessment (EIA) Screening Report has been prepared by Hennie Kallmeyer (Senior Planner) of Declan Brassil & Co. Ltd. (DBCL) who has over 20 years professional planning experience and holds a Masters Degree in Town and Regional Planning (University of Stellenbosch, South Africa (1997), and Sinead O'Connor (Planning and Environmental Consultant) of DBCL who has a degree in Environmental Sciences from TCD (2008) and a Masters Degree in Regional and Urban Planning from UCD (2011).

Hennie and Sinead directed, co-ordinated and prepared EIAR Screening Reports and EIARs for a range of large and complex developments, including infrastructure, residential developments, and major urban regeneration projects.

This report has had regard and has been informed by the following documents prepared by specialist consultants and that accompany this application:

- Construction and Demolition Waste Management Plan, prepared by CS Consulting Engineers;
- Flood Risk Assessment, prepared by CS Consulting Engineers;
- Traffic and Transport Assessment (TTA), prepared by CS Consulting Engineers;
- Landscape Design Report, prepared by Cunnane Stratton Reynolds;
- Landscape and Visual Impact Appraisal, prepared by Cunnane Stratton Reynolds;
- Appropriate Assessment Screening Report, prepared by Wildlife Surveys Ireland Ltd;
- Ecological Impact Assessment, prepared by Wildlife Surveys Ireland Ltd;
- Construction and Environmental Management Plan, prepared by TMS Environment Ltd;
- Noise Impact Assessment, prepared by TMS Environment Ltd;
- Operational Waste Management Plan, prepared by TMS Environment Ltd; and
- Archaeological Desk Study, prepared by Archaeological Projects Ltd.

1.2 Brief Description of the Development

The proposed development will consist of the demolition of all structures on the site, site clearance works and the construction of 2 no. apartment blocks (Blocks A and B) providing 111 no. apartments in total (comprising 3 no. studios, 51 no. one bedroom units, 46 no. 2 bedroom / 4 person units and 11 no. 2 bedroom / 3 person units).

Block A (Western block, fronting Dundrum Road) comprises a 6-storey block (5 levels over lower ground level / semi-basement) stepping down to the east to 4-storeys in height. Block B (Eastern block, towards the rear (east) of the site) is of part 2-, and part 3-storey height. The proposed development has a total gross floor area of 10,291 sq.m and provides; internal communal ancillary residential services / amenities to include a post room at lower ground floor level within Block A; a shared amenity / lounge (17.5 sq.m) and a storage room (11.8 sq.m) at second floor level within Block B.

A semi-basement / lower ground floor level is provided in Block A that will be accessed via a vehicular ramped access/egress onto/off Sommerville Road to the north. This semi-basement provides two refuse stores; 39 no. car parking spaces (of which 10 no. spaces are fitted for Electric Vehicles and including 3 no. car club spaces); secure bicycle parking / storage in the form of 82 no. double stacked bicycle storage spaces providing 164 no. residents cycle parking spaces; 2 no. cargo bike storage areas; 3 no. motorcycle spaces; plant room (75 sq.m) and an ESB substation/switch room.

At ground / surface level provision is made for 2 no. disabled car parking spaces (both fitted for Electric Vehicles) together with 56 no. short stay bicycle storage spaces in the form of 28 no. Sheffield stands and a further 3 no. Sheffield stands providing 6 no. long stay bicycle spaces plus 2 no cargo storage bike spaces. An enclosed bin store is also provided at surface level to the north of Block B.

Communal outdoor amenity space is provided for residents in the form of rooftop terraces located at 2nd floor level within Block A and B, respectively (totalling 360 sq.m in area), and communal courtyard spaces at ground floor level between blocks (totalling 1,563 sq.m in area). Private amenity spaces are proposed in the form of patios / terraces at lower ground and ground floor levels with balconies serving apartments at the upper levels. Hard and soft landscaping works are proposed at ground floor level which includes the provision of footpaths; fire tender access and an informal play area for children.

Provision is made for 4 no. rooftop telecommunications antennae (Block A) and an associated base station / cabinet that will be located within a designated comms room (approximately 13.6 sq.m) that is situated at lower ground floor level within Block A.

Works proposed to the existing Sommerville and Dundrum Road junction include the provision of an uncontrolled pedestrian crossing (including dropped kerbs and tactile paving) and reduced junction radii to 6.0m. Works proposed at the site access road from Sommerville Road include the provision an uncontrolled pedestrian (to include dropped kerbs and tactile paving).

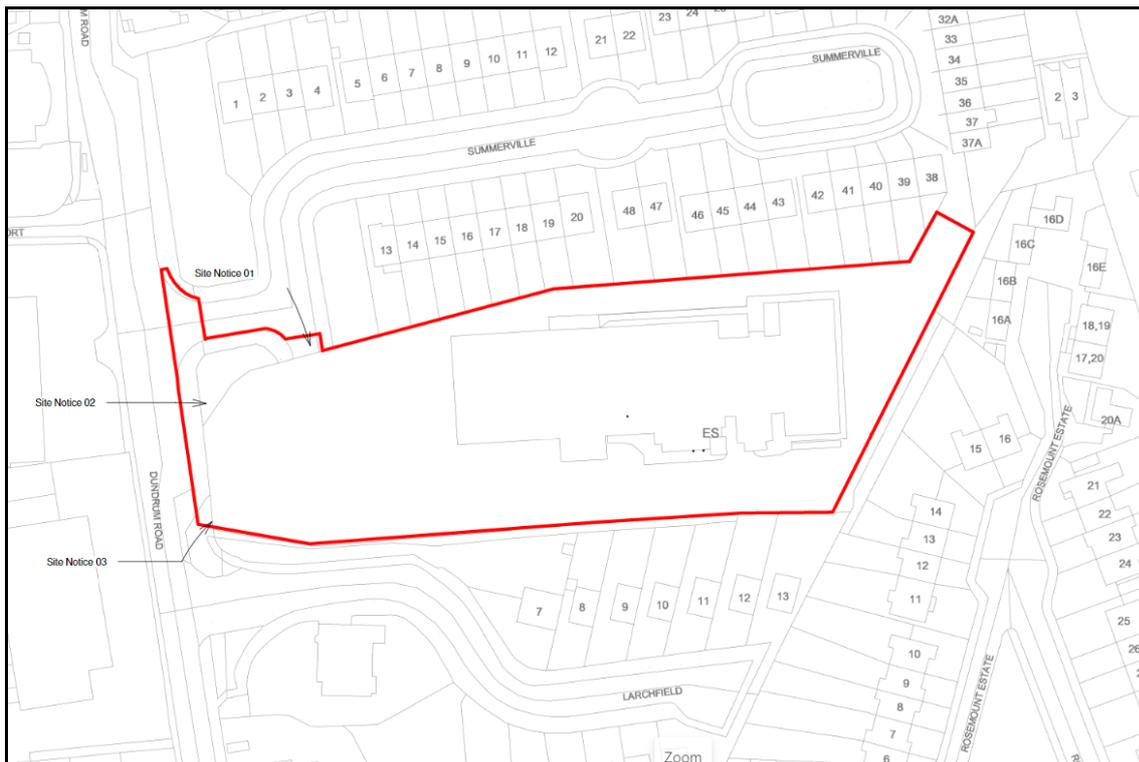
A detailed description of the development in terms of its characteristics and location are provided in the tables under Section 3 of the report by having specific regard to the environmental sensitivity of geographical areas likely to be affected, as required under Para. 1 of Schedule 7A of the Planning Regulations.

1.3 Site Location and Description

The site is situated to the north of Dundrum town centre and in close proximity to the Luas green line. Within 1km of the site there are several shops, restaurants & cafes, Milltown golf club, Luas stops, multiple bus routes and several playing fields. The site extends to approximately 0.794 ha (7,944 sq.m).

The site is bounded by Dundrum Road to the west, and by the rear gardens of existing housing estates located to the north (Sommerville), and the south and the east (Larchfield).

Figure 1.1: Site Location



The site is currently occupied by a Data Centre operated by eir. The building is rectangular and 110m long, orientated east – west longitudinally within the site. The site is accessed through a gateway off Somerville to the north, via a wide tarmacked driveway lined with parking running along the south of the building.

The perimeter of the site is formed by a mix of a high level (approximately 2m high) random rubble granite walls and rendered concrete walls with security fencing to some boundaries. There are large mature trees along the site boundaries, particularly the southern and eastern boundaries, however some of these trees are located in adjacent gardens and has spread across the boundary. The northern boundary is raised up with very little screening vegetation present. The south and west boundaries comprises large retaining walls with the earth mounded up along the northern boundary. The site is approximately 1-2m higher than the streets at the south and west boundaries. The highest level within the site is at the north-eastern corner with the land sloping down in a westerly direction towards Dundrum Road.

The site backs onto two-storey houses located to the north, east and south-east. The immediate character

is that of a well-established, mature suburb. Along the Dundrum Road to the west of the site is a mixed character of commercial and retail premises and cottages, bungalows and older houses. The road is narrow and has clearly evolved from a country road with houses and gardens close to the road along narrow paths each side.

The site fronts to Dundrum Road and is located less than 400m from the Dundrum Town Centre LUAS Station that is situated to the south, and 700m from the Windy Arbour LUAS station located to the north. The site is also well served by bus services. There are 3 bus route stops within a 5-minute walking distance (Nos. 17, 44 and 61). There are a further 6 bus routes operating within a 10-minute walking distance (Nos. 14, 44b, 75, 161, 175 and 750).

The aerial view in Figure 2.2 shows the existing buildings and vegetation on site, and its relationship with the rear gardens of adjoining residential properties to the north, east and south.

Figure 1.2: Aerial View of Site



2.0 LEGISLATIVE BASIS / CONTEXT FOR ENVIRONMENTAL IMPACT ASSESSMENT SCREENING

2.1 EIA Requirements

Environmental Impact Assessment (EIA) requirements derive from EU Directive 2011/92/EU, as amended by Directive 2014/52/EU which details the requirements for the screening of projects for Environmental Impact Assessment. In this regard, recital (27) of Directive 2014/52/EU (hereafter referred to as the EIA Directive) states that:

'The screening procedure should ensure that an environmental impact assessment is only required for projects likely to have significant effects on the environment'.

The primary objective of the EIA Directive is to ensure that projects that are likely to have significant

effects on the environment are subjected to an assessment of their likely impacts.

A variety / range of different types of projects and associated thresholds are defined in the EIA Directive to classify whether a project is, or is not likely to have a significant effect. These are set out as Annex I and Annex II projects.

Annex I projects require mandatory EIA.

Annex II projects require EIA only if significant effects are likely to arise. This is determined / established in two ways:

- Classes of project and associated thresholds whereby 'significant effects' are triggered; and
- Sub-threshold projects that are likely to have 'significant effects on the environment'.

In respect of the latter, Annex III sets out criteria whereby significance of effects is assessed / determined.

Member States are given some discretion in respect of establishing EIA thresholds / criteria for Annex II projects. Notwithstanding, it is noted that Article 2(a)(1) of the EIA Directive requires that projects should be subjected to EIA, if significant effects on the environment are likely to arise due to their nature, size, or location.

The EIA Directive (2014/52/EU) was transposed into The European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) on 1st September 2018. Annex II projects are transposed into the Irish Planning Code by Schedule 5 Part 2 and Schedule 7 of the Planning Regulations, as set out below.

2.2 Planning and Development Act, 2000 (as amended) (PDA)

Section 172(1) of the PDA sets out the following requirements for EIA:

"(a) the proposed development would be of a class specified in—

(i) Part 1 of Schedule 5 of the Planning and Development Regulations 2001, and either—

(I) such development would equal or exceed, as the case may be, any relevant quantity, area or other limit specified in that Part, or

(II) no quantity, area or other limit is specified in that Part in respect of the development concerned,

or

(ii) Part 2 of Schedule 5 of the Planning and Development Regulations 2001 and either—

(I) such development would equal or exceed, as the case may be, any relevant quantity, area or other limit specified in that Part, or

(II) no quantity, area or other limit is specified in that Part in respect of the development concerned,

or

(b) (i) the proposed development would be of a class specified in Part 2 of Schedule 5 of the Planning and Development Regulations 2001 but does not equal or exceed, as the case may be, the relevant quantity, area or other limit specified in that Part, and

(ii) it is concluded, determined or decided, as the case may be by a planning authority, in exercise of the powers conferred on it by this Act or the Planning and Development Regulations 2001 (S.I. No. 600 of 2001)....that the proposed development is likely to have a significant effect on the environment."

2.3 The Planning Regulations – Annex II Thresholds for EIA

As noted above, Schedule 5 of the Planning Regulations, sets out the categories of development and thresholds for activities that require EIA for the purposes of Part X of the PDA (above).

The proposed development comes within Class 10(b) of Annex II – ‘Urban Development’. The relevant thresholds are as follows:

- Class 10 (b)(i) – ‘Construction of more than 500 dwelling units’, and
- Class 10(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 111 no. dwellings fall below the Class 10(b)(i) threshold of 500 units and the site area of approximately 0.79ha also falls below the Class 10(b)(iv) thresholds. Accordingly, EIA is not a mandatory requirement for the proposed project.

However, Part 2 Classes 14 and 15 state the following, respectively:

- Class 14 – ‘Works of demolition carried out in order to facilitate a project listed in Part 1 or Part 2 of this Schedule, where such works would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.’
- 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.’

Having regard to the above, the proposed project is considered sub-threshold development that should be further examined / assessed in accordance with Schedule 7 criteria in accordance with Schedule 5, Part 2, Classes 14 and 15, as outlined above.

2.4 Schedule 7 – Sub-threshold Development

As stated above, the proposed development is considered to be a project / development type that is listed within Part 2 but does not exceed the specified thresholds / limits, and is therefore considered to be ‘sub-threshold’ development for purposes of EIA. It is therefore considered necessary to investigate if the proposal would be likely to have significant effects on the environment that could potentially require the submission of a sub-threshold EIA.

Schedule 7 and 7A of the Planning Regulations set out the required information to be provided for

purposes of screening sub-threshold development for EIA by a Planning Authority, as follows:

"1. A description of the proposed development, including in particular—

(a) a description of the physical characteristics of the whole proposed development and, where relevant, of demolition works, and

(b) a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.

2. A description of the aspects of the environment likely to be significantly affected by the proposed development.

3. A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from—

(a) the expected residues and emissions and the production of waste, where relevant, and

(b) the use of natural resources, in particular soil, land, water and biodiversity.

4. The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7."

2.5 Articles 299B and 299C of the Planning Regulations

No screening determination was requested or made under Section 7 of the Planning and Development (Housing) and Residential Tenancies Act 2016 (as amended) (the '2016 Act').

Articles 299B and 299C of the Planning Regulations prescribe the requirements for sub-threshold development where no screening determination was made under Section 7 of the 2016 Act.

The application is not accompanied by an Environmental Impact Assessment Report (EIAR).

In cases where an application for sub-threshold development is not accompanied by an EIAR, but where there is *"significant and realistic doubt in regard to the likelihood of significant effects on the environment arising from the proposed development"*, Article 299B(1)(b)(ii)(II) of the Planning Regulations places an obligation on ABP that it must satisfy itself that the Applicant has provided the following:

(A) the information specified in Schedule 7A,

(B) any further relevant information on the characteristics of the proposed development and its likely significant effects on the environment, and

(C) a statement indicating how the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive have been taken into account

Article 299B(1)(c) of the Planning Regulations indicates that:

The information referred to in paragraph (b)(ii)(II) may be accompanied by a description of the features, if any, of the proposed development and the measures, if any, envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment of the development.

The information required by parts (A) and (B) of Article 299B(1)(b)(ii)(II), namely, the information specified in Schedule 7A and any further relevant information on the characteristics of the proposed development and its likely significant effects on the environment, is contained in Section 3, below.

As stated above, a separate Statement accompanies this report that provides the information required under part (C) of Article 299B(1)(b)(ii)(II) - namely, a statement indicating how the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive have been taken into account.

All of this information is provided by the applicant to enable the Board to complete an examination for the purposes of a screening determination in accordance with Articles 299B and 299C of the Planning Regulations. It is provided so that the Board may have regard to all of the matters prescribed at Article 299C(1)(a) of the Planning Regulations.

3.0 ASSESSMENT OF THE PROPOSED DEVELOPMENT FOR SIGNIFICANT LIKELY EFFECTS

Annex 3 of the EIA Regulations sets out the screening criteria in relation to proposed developments classified as Schedule 2 developments. These criteria seek to provide an understanding of the character and complexity of impacts as well as any sensitivities which relate to a site. In summary, the criteria fall under three broad headings:

- Characteristics of the development – taking into account the size, use of natural resources, production of waste and emissions and risk of accidents, etc. Refer to Table 3.1 under sub-section 3.1.1 below.
- Location of the development – consideration of environmental sensitivity of geographical areas likely to be affected by development. Refer to Table 3.2 under sub-section 3.1.2, below.
- Characteristics of the potential impact – specifically having regard to the extent, magnitude, complexity, probability, duration, frequency and reversibility of the impact.

3.1 Assessment under Schedule 7 of the Regulations

3.1.1 Characteristics of the Proposed Development

Tables 3.1 to 3.3 provides a summary of the required information to be provided for screening purposes.

Table 3.1: Characteristics of the Proposed Development

<i>The characteristics of proposed development, in particular—</i>	
Criteria	Assessment
<i>(a) the size and design of the whole of the proposed development,</i>	<p>The proposed development is considered sub-threshold as outlined above, comprising of a 111 unit apartment development on a site that extends to approximately 0.79 ha. The proposed development includes associated site works and infrastructure provision.</p> <p>The size and design of the project is not likely to cause significant effects on the environment.</p>
<i>(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,</i>	<p>The proposed development is located within an established residential area. The assessments undertaken as part of this project have been informed by the site's surrounding context.</p> <p>A total of 5 no. recent significant permissions, including 1 no. development for a large scale residential development, have been identified under section 6.3 of the accompanying Planning Report and Statement of Consistency, and duplicated in Appendix A attached to this Report.</p> <p>Having regard to the nature, scale and proximity of these developments to the subject site, it is considered that only the permitted SHD scheme under ABP Planning Application Ref. ABP SHD Ref. 311287-21 (site at No. 97A Highfield Park (D14P710), and No. 1 Frankfort Castle (D14 HY03), No. 2 Frankfort Castle (D14DE72) and Frankfort Lodge (D14C9P2), Old Frankfort, Dublin 14) would have potential for cumulative effects on the environment, as there is a possibility that in the event that ABP grants permission that the construction phase of this development could potentially overlap with the proposed development that is the subject of this application. In terms of physical proximity, this proposed development is situated approximately 185m to the west of the subject site. For purposes of traffic and transport assessment a relatively small-scale residential development of 13 no. houses under (DLRCC Planning Ref. D20A/0189) with vehicular accesses onto Sydenham Road and Taney Road has also been factored into junction capacity assessments.</p> <p>The proposed development forms part of an established urban area of Dundrum. Section 1.3.3 of the emerging County Development Plan 2022-2028 identifies that the Dundrum area wherein the subject site occupies a centrally located position, is an area in need of regeneration and renewal. The draft plan clearly states the intention of the Council to prepare a Local Area Plan (LAP) for this area. It is noted that an LAP will need to be consistent with the new County Development plan (once adopted) and will be subjected to Strategic</p>

	<p>Environmental Assessment (SEA).</p> <p>The wider area represents a dynamic and evolving context with a number of projects being progressed at the same time. Whilst none of the identified projects at Appendix A are intrinsically linked with the subject project, having regard to the nature / scale and proximity of the proposed development at Frankfort Castle (above), it is considered that the key cumulative impacts that are likely to arise relate to traffic and landscape and visual impact.</p>
<p><i>(c) the nature of any associated demolition works</i></p>	<p>The application site is occupied by a Data Centre that sits centrally within the c. 0.79 ha site that includes hard surface access routes / parking area and some green area. The site is fenced. The site is surrounded by dwelling houses and fronts onto a busy road to the west.</p> <p>The proposed development would require the demolition and removal of all existing structures on site and would include groundworks to facilitate the proposed construction works.</p> <p>Site development / preparation works required to facilitate the project will be carried out in accordance with best practice. Given the relatively limited scale of these associated site development works, no likely significant impacts are likely to occur.</p>
<p><i>(d) the use of natural resources, in particular land, soil, water and biodiversity,</i></p>	<p>The Project will use land and construction materials.</p> <p>The proposed development does not include the extraction of materials or groundwater from local sources. Minimal excavation will be required to facilitate the proposed development.</p> <p>The construction phase of the proposed development will use natural resources including aggregate, cement, wood and water, sourced off site. These are secondary impacts associated with off-site activities, such as quarrying, which are subjected to separate consenting procedures, which consider the impacts arising at those locations.</p> <p>Development of the site, would by its very nature, require the use of a range of natural and manmade construction materials to complete the build and finish of the development. However, no adverse significant impacts are expected to occur on the site or in the vicinity of the site through the use of natural resources.</p>

	<p>facilities and contractors.</p> <p>An Operational Waste Management Plan (OWMP) has been prepared by TMS Environment Ltd. also. The environmental impact of waste generation has been considered in terms of national and local policy and legislation and best practice for waste management.</p> <p>During operation, household and commercial waste will be disposed of by licensed waste disposal contractors. Operationally the developments would implement recycling regimes and are unlikely to result in large amounts of waste that would result in a significant effect on the environment.</p> <p>The submitted OWMP demonstrates that the proposed development shall be designed and managed to provide waste management infrastructure that will minimise the generation of residual waste and maximise the opportunities for segregating and recycling waste generated by the development. Implementation of this OWMP will ensure a high level of recycling, reuse and recovery at the development. All recyclable materials will be segregated at source and managed to ensure effective diversion from landfill wherever possible.</p> <p>No potential significant impacts are envisaged on the site or in the vicinity of the site as a result of the production of any waste associated with the proposed development.</p>
<p>(f) pollution and nuisances,</p>	<p>Potential impacts of the proposed development in relation to pollution and nuisances are mainly predicted to occur at the construction stage of the development and include Soils, Air, Noise, Vibration, Water and Traffic. These potential impacts at the construction stage of the project are described in more detail in the submitted Construction and Environmental Management Plan.</p> <p>Best practice methods will be utilised during construction to mitigate potential impacts from pollution on the local environment during construction. There will be some potential for short-term noise and vibration impacts during construction, and prevention measures to reduce nuisance are set out in the submitted Construction and Environmental Management Plan (CEMP) which accompanies the planning application.</p> <p>Subject to the implementation of the mitigation measures identified in the CEMP, and conditions attached to any grant of planning permission, it is envisaged that any likely environmental impacts would be appropriately avoided and mitigated.</p>

<p><i>(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</i></p>	<p>Best practice construction measures will be employed throughout the construction phase. It should also be noted that the subject lands are not located in close proximity to any Seveso site(s).</p> <p>Accompanying this application is a Flood Risk Assessment (FRA), prepared by CS Consulting Engineers.</p> <p>This report indicates that the site is located approximately 100m from the Slang River (also known as the Dundrum Slang or the Dundrum River) to the west. It also identifies that the subject site falls within Flood Zone C where residential development is considered appropriate from a flood risk perspective. Section 4 of the report provides an assessment of flood risk from fluvial-, pluvial-, tidal and groundwater flooding as well as the risk of the proposed development contributing to off-site flooding elsewhere. In this regard the FRA concludes that the subject site and or proposed development would not be at risk of flooding.</p>
<p><i>(h) the risks to human health (for example, due to water contamination or air pollution)</i></p>	<p>Potential impacts of the proposed development which may be relevant to human health relate to factors previously detailed, such as noise, water and air pollution.</p> <p>Subject to the implementation of appropriate construction management and mitigation measures, the proposed development is unlikely to pose any significant risks to human health.</p>

3.1.2 Location of the Proposed Development

Table 3.2: Location of the Proposed Development

<i>The environmental sensitivity of geographical areas likely to be affected by the proposed development, with particular regard to—</i>	
Criteria	Assessment
<i>(a) the existing and approved land use,</i>	<p>The subject site comprises a substantial brownfield site that extends to approximately 0.79ha in area. The site is currently occupied by a Data Centre operated by eir. The building is rectangular and 110m long, orientated east – west longitudinally within the site. The site is accessed through a gateway off Sommerville to the north, via a wide tarmacked driveway lined with parking running along the south of the building.</p> <p>The subject site is zoned '<i>Objective A – To protect and / or improve residential amenity</i>'. Residential development is permitted in principle.</p>
<i>(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground,</i>	<p>The subject site is a brownfield site. There are no significant natural resources present on the site or its immediate surroundings.</p> <p>The main potential impacts on soils and geology would result from the construction through the stripping of topsoil together with the excavation of subsoil layers that is required to facilitate overall development works, in particular the construction of foundations, roads, foul and surface water sewers and infrastructure. Such impacts would be temporary in nature.</p> <p>The proposed development is designed to comply with the recommendations of the Greater Dublin Sustainable Drainage Study, including the provision of Sustainable Urban Drainage Systems and is therefore unlikely to have any residual impacts in terms of the impact on surface water drainage.</p> <p>It is considered that the proposed development would not have any significant impact on the underlying bedrock, geology, or hydrogeology of the site, either during the construction or operational phases of development.</p> <p>Having regard to the established suburban character of the receiving environment and the surrounding area, the infill development of this brownfields site will not individually or</p>

	<p>cumulatively significantly impact on the integrity of any natural resource or the biodiversity value of the site. It follows that the project will not, cumulatively, or individually significantly impact on the abundance, availability, quality, and regenerative capacity of natural resources in the area during the construction and/or operational phases of the development.</p> <p>The proposed development has been subjected to AA Screening and an Ecological Impact Assessment of the site and the proposed development was carried out which did not identify any significant adverse impacts.</p>
<p>(c) the absorption capacity of the natural environment, paying particular attention to the following areas:</p> <p>(i) wetlands, riparian areas, river mouths;</p> <p>(ii) coastal zones and the marine environment;</p> <p>(iii) mountain and forest areas;</p> <p>(iv) nature reserves and parks;</p> <p>(v) areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive and;</p>	<p>The proposed development site is not immediately adjacent to any wetlands, riparian areas, river mouths, coastal zones (marine environment), mountains, forested areas or nature parks/reserves.</p> <p>An AA Screening Report, and an Ecological Impact Assessment, prepared by Wildlife Surveys, accompany this application. The AA Screening Report concludes:</p> <p><i>'The proposed development site at Sommerville, Dundrum is not located within or directly adjacent to any Natura 2000 site. No source – pathway – receptor connection was identified between the proposed development site and any Designated Site. The Appropriate Assessment screening process considered potential impacts which may arise during the installation and operational phases of the changes being considered. Through an assessment of the pathways for effects and an evaluation of the activities, taking account of the processes involved and the distance of separation between Natura 2000 designations in the wider study area, it has been evaluated that there are no likely significant adverse effects on the qualifying interests or the conservation objectives of any designated Natura 2000 site.</i></p> <p><i>It is concluded that the proposed development, individually or in combination with other plans and projects, will not have a significant effect on a European site. Consequently, the proposed development does not require an Appropriate</i></p>

<p><i>(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;</i></p> <p><i>(vii) densely populated areas;</i></p> <p><i>(viii) landscapes and sites of historical, cultural or archaeological significance.</i></p>	<p><i>Assessment; there is, therefore, no requirement to progress to Stage 2: Natura Impact Statement (NIS)'.</i></p> <p>Similarly, the submitted Ecological Impact Assessment concludes in Section 11 that <i>'...although the proposed development may have some temporary negative impacts at the local level, these impacts will be fully mitigated over time to be rendered negligible'.</i></p> <p>The subject site is not connected to an area wherein there has already been a failure to meet environmental quality standards.</p> <p>The immediate townscape context is suburban in nature and characterised by primarily low-density forms of housing, such as detached, semi-detached and terraced houses with interspersed higher density forms, such as apartment blocks. As such, the immediate area within which the proposed development is located is not considered a densely populated area.</p> <p>The submitted Archaeological Impact Assessment establishes the following:</p> <ul style="list-style-type: none"> • Recorded Monuments - The subject site is not close to any known sites listed on the Record of Monuments and Places. The closest site is the ecclesiastic enclosure at Taney Dundrum Td (DU022-016001-5) which lies c. 600m distant. Dundrum Castle (DU022-023002) lies over 1.2km south-west of the application site. • Archaeology – It is considered that there is a very low likelihood of any deposits of archaeological significance remaining on the application site, due to the construction in relatively recent years of the Eir Data Centre. Preparation of the ground for construction of this building, attendant services, drainage and other utilities, will have removed all topsoil and the upper level of subsoil. Any
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archaeological features which may have been present on the site will have been removed in the construction of the present building. Accordingly, there is no requirement for an archaeological mitigation strategy.

- Protected Structures - The nearest Protected Structure to the subject site is Woodlawn House (RPS Ref. 789) that is situated at Churchtown Road Upper, approximately 400m to the south-west of the application site. There are thus no protected structures located within a zone of influence from the application site that could potentially be affected by the proposed development.

The submitted Landscape and Visual Impact Appraisal (LVIA) prepared by Cunnane Stratton Reynolds concludes:

Landscape Effects:

'The landscape (townscape) sensitivity of the site and wider environs is regarded as Medium - it is a landscape with valued characteristics but reflecting ongoing change and with a capacity to accommodate change – a robust landscape / townscape.

Local policy is supportive of change that consolidates and densifies the urban form. Valuable characteristics include trees and views to the mountains remain. The proposed development is comparatively modest and well composed to integrate in the receiving landscape. Change is regarded as of Medium magnitude.

The importance of the effect is regarded as Moderate and qualitatively Neutral to Beneficial.'

Visual Effects:

'Section 7 above assesses 19 representative viewpoints. 12 of these are residential locations with a high sensitivity to change. 5 of these residential viewpoints experience no effect. 6 of the remaining experience Low to Important effects but all Neutral i.e. the development integrates well and complements the views. 1 view from Sommerville experiences a Moderate Importance and Adverse effect, partly created by the oblique angle of view from the location.

4 of the remaining views are from the Dundrum Road.

	<p><i>These experience Low and Neutral effects (further away) to Important and Beneficial effects when closer and the full elevation is visible.</i></p> <p><i>A view from Frankfort just off Dundrum Road also experiences a Moderate and Neutral effect.</i></p> <p><i>The view from William Dargan Bridge experiences a Negligible and Neutral effect and from the Luas stop at Windy Arbour the development is not visible'</i></p> <p><i>Summary Overall – 'Overall the development integrates well, is well designed and composed of appropriate materials in a contemporary manner that engages with its environs in different ways. Overall its effects although locally high in places, are Neutral to Benign – a beneficial change to the townscape and visual quality of the area and in keeping with existing ongoing change and as proposed in local policy.'</i></p> <p>Accordingly, it is considered that the receiving environment has sufficient capacity to absorb the proposed development and no significant likely effects are envisaged.</p>
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3.1.3 Identification and Description of Potential Impacts

Table 3.3: Type and Characteristics of Potential Impacts

<i>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-</i>	
Criteria	Assessment
<p><i>(a) the magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected),</i></p> <p><i>(b) the nature of the impact,</i></p>	<p>The proposal relates to an existing commercial site in an established residential area. During the construction phase, the proposal is anticipated to have a moderate impact in terms of noise, vibration and air quality together with general nuisance of construction traffic on the local population. Measures outlined within the accompanying CEMP will ensure that these impacts are minimised. Sensitive receptors are identified in Section 2 of the CEMP and comprise mainly immediately adjoining residential properties to the north, east and south of the site along with the Central Mental Hospital and commercial premises to the west of Dundrum Road.</p>

	<p>An Ecological Impact Assessment (ECIA) has been carried out by Wildlife Surveys and confirms that no significant negative effects on the biodiversity value of the site are envisaged as a result of the proposed development. The ecological surveys of the site submitted with this application did not identify any evidence of the presence of any protected fauna or flora species. The surveys did identify that the site is used by feeding / commuting bats.</p> <p>It is not anticipated that the proposed development would give rise to any significant adverse long-term impacts associated with the operational phase of the proposed development.</p>
<i>(c) the transboundary nature of the impact</i>	The proposed development will not give rise to any impacts that are transfrontier or transboundary in nature.
<i>(d) the intensity and complexity of the impact,</i>	The potential impacts are not considered to be complex in nature or of a magnitude/intensity/scale to be of significance.
<i>(e) the probability of the impact</i>	With the exception of the introduction of invasive plant species, all of the identified impacts are likely to occur. However, having regard to the nature and extent of the impacts identified, no significant impacts are anticipated to occur.
<i>(f) the expected onset, duration, frequency and reversibility of the impact,</i>	<p>Having regard to the nature and extent of the impacts identified in Tables 3.2 and 3.3, no significant adverse impacts with a high frequency of occurrence have been identified.</p> <p>The receiving environment comprises a robust, highly developed environment within which the proposed development has limited potential for adverse impact. The development represents a sustainable infill development opportunity that will contribute towards urban consolidation that is considered consistent with existing and emerging trends for established neighbourhoods within the Dundrum area.</p> <p>The duration of the traffic / transport and landscape/visual effects are considered to be long term/permanent and irreversible. Given the plan-led nature of the proposed development it is not considered that these impacts will be significant.</p>
<i>(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</i>	The Dundrum environs is a dynamic environment that is characterised by constant and ongoing development and associated infrastructure works provision mainly associated with residential, mixed use and/or commercial

<p>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</p>	<p>developments. As such, the proposed development is likely to coincide with other projects at the implementation / construction stage.</p> <p>As set out under Table 3.1 (above), this assessment has had regard to the relevant planning history for the wider area and a total of 5 no. recent permissions, including 1 no. strategic housing development have been identified under sub-section 6.3 of the accompanying Planning Report and Statement of Consistency, as duplicated in Appendix A attached to this report.</p> <p>Having regard to the nature / scale and proximity of these developments to the subject site it is considered that only the permitted SHD scheme at No. 97A Highfield Park (D14P710), and No. 1 Frankfort Castle (D14 HY03), No. 2 Frankfort Castle (D14DE72) and Frankfort Lodge (D14C9P2), Old Frankfort, Dublin 14 under ABP Planning Application Ref. ABP SHD Ref. 311287-21 would have potential for cumulative effects on the environment, as there is a strong possibility that the construction phase of this development could potentially overlap with the proposed development, the subject of this application. In terms of physical proximity, this proposed development is situated approximately 185m to the west of the subject site.</p> <p>None of the identified projects at Appendix A are intrinsically linked with the subject project. In this context it is considered that cumulative impacts with other existing and/or approved projects are not likely to cause significant effects on the environment.</p>
<p>(h) the possibility of effectively reducing the impact</p>	<p>The Construction and Environmental Management Plan include mitigation measures to effectively reduce any potential impacts at the construction stage.</p> <p>The principal operational phase impacts (traffic and landscape and visual) have been considered during the design process of the project with the view to minimise such impacts.</p>

3.2 Assessment under Schedule 7A of the Regulations

In order to provide the Planning Authority with all the requisite information for a screening determination, the information required in Schedule 7A is detailed in the tables under the preceding sub-section 3.2.1. This is based on the criteria in Schedule 7 as referenced under Paragraph 4 of Schedule 7A – i.e. ‘The

compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7.' Given the very large degree of overlap / similarity between the Schedule 7 and Schedule 7a criteria appropriate reference is provided in the right-hand column of the table below to the relevant table addressing the criteria under Schedule 7.

Table 3.4: Summary of Schedule 7A Criteria (Paragraphs 1-3)

Criteria	Reference / Assessment
<p>1. A description of the proposed development, including in particular— (a) a description of the physical characteristics of the whole proposed development and, where relevant, of demolition works, and</p>	Refer to Table 3.1, criteria (a) to (c), above.
<p>(b) a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.</p>	Refer to Table 3.2, criteria (a) to (c), above.
<p>2. A description of the aspects of the environment likely to be significantly affected by the proposed development.</p>	Refer to Table 3.3, above.
<p>3. A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from— (a) the expected residues and emissions and the production of waste, where relevant, and (b) the use of natural resources, in particular soil, land, water and biodiversity.</p>	Having regard to the nature and extent of the impacts identified in Tables 3.2 and 3.3 above, it is not envisaged that any significant effects on the environment would result from either expected residues and /or emissions; the production of waste or the use of natural resources.

3.3 Useful Tools in Assessing the Likelihood of Significant Impacts Occurring

The EU Guidance document – *Environmental Impact Assessment of Projects – Guidance on Screening (November, 2017)* provide some useful tools in Part C of this document to assist in applying the Annex III criteria on a case-by-case basis / examination. It clarifies to state that the intended purpose of these tools are '...to be of assistance where there is no Member State guidance or where the need for an EIA is still not clear. They are designed to help answer the question: 'Is this Project likely to have significant impacts on the environment?'. It is important to emphasize that the use of these tools is not intended to require special studies. The tools are intended to be used quickly by people with the qualifications and experience typically found in competent authorities, and through using information about the Project and its environment that is

readily available.'

Attached at Appendix B is a matrix setting out the questions (as per the above guidance) that have been considered in the identification of environmental impacts. The criteria considered in evaluating the characteristics of the likely impacts and the significance thereof (as described in the last column of Appendix B) are listed in Appendix C.

The Screening Checklist at Appendix C provides a list of questions that assisted in identifying where there is the potential for interactions between the project and the receiving environment. The above guidance clarifies that this *'checklist is designed to help decide whether those interactions – its impacts - are likely to be significant'*, and further states:

'These questions can be asked for each 'Yes' answer in the Screening Checklist and the conclusion and the reasons for it noted in the checklist. The questions are designed so that a 'Yes' answer will generally point towards the need for an EIA process and a 'No' answer points to an EIA process not being required. The answer that the impact is uncertain would, most likely, point to the need for an EIA Process.'

Having regard to the Table at Appendix B it is noted that the answer to all the listed questions in terms of the likelihood of a significant impact(s) arising on a wide range of environmental effects is negative / 'no'. This is considered an indication that the proposed project need not be subjected to Environmental Impact Assessment (EIA) and the preparation of an Environmental Impact Assessment Report (EIAR).

4.0 CONCLUSION

The subject project does not require mandatory EIA under Annex I. Having regard to Annex II (where EIA may be required) and Annex III (sub-threshold EIA) the screening assessment has found the following:

Annex II (PDR as amended, Schedule 5 Part 2)

Type / Class	Threshold / Criteria	Summary	EIA Required?
Part 2 Class 10(b)(i)	Construction of more than 500 dwellings .	Proposal involves construction of 111 no. dwellings	No
Part 2 Class 10(b)(iv)	Urban development on area greater than 10 ha in built-up area.	Site area is c. 0.79ha	No
Part 2, Class 14	Works of demolition carried out in order to facilitate a project where such works would be likely to have significant effects on the environment, having regard to the criteria set out in	Proposal is not likely to have significant impacts.	No

	Schedule 7		
Part 2, Class 15	Any project not meeting thresholds of Part 2 but would still be likely to have significant environmental impacts having regard to criteria in Schedule 7	Proposal is not likely to have significant impacts.	No

On the basis of the above and having regard to the broad scope and purpose of the EIA Directive, it is our opinion that by virtue of its nature, size, and location, the subject project would not be likely to result in significant impacts on the environment. Accordingly, it is considered that EIA is not required.

Appendix A

Relevant Developments / Projects Nearby

A.1. RELEVANT LARGE SCALE OR STRATEGIC HOUSING DEVELOPMENTS NEARBY

A number of strategic housing developments have been permitted by ABP in the Dundrum area. Set out below under separate headings is a summary of relevant SHD applications and permitted development in the area.

A.1.1 ABP SHD Ref. 304469-19 and 307683-20 (Site at Greenacres, Longacre and Drumahill House, Upper Kilmacud Road, Dundrum, Dublin 14) – situated approximately 1.58km to the south-east

On the 26th August 2019, ABP granted permission (SHD) for the demolition of 2 no. houses and ancillary buildings on site and the construction of 3 no. apartment blocks ranging in height from 4 to 6 storeys, comprising 253 no. apartments and associated tenant amenity spaces and a crèche of 236 sq.m, with associated external play space and 5 staff car parking spaces.

A total of 212 no. car parking spaces resulting in a rate of 0.8 spaces per unit, 7 motorbike parking spaces, and 348 no. bicycle spaces at basement level plus 52 visitor bike spaces at ground level (totalling 400 bicycle spaces).

Summary of Site Development Parameters:

- No. of apartments – 253 units
- Site Area - 1.76 Ha
- Density - 143.75 units per Ha
- Creche 236 sq.m - catering for 41 children
- Building Heights - range from 4 – 6 storeys
- Site Coverage - 25%
- Dual Aspect ratio - 59.7% dual/triple aspect
- Car Parking - 212 spaces

On 10 November 2020, ABP granted permission for amendments to the above scheme under ABP Ref. 307683-20. In summary the proposed amendments consist of the provision of 54 no. additional apartments on the previously permitted Greenacres residential development of 253 no. apartments, as permitted under ABP Reg. Ref. 304469. This brings the total number of apartments to 307, and increase the existing permitted height of 4-6 storeys, to a proposed 4-8 storey building height(s).

A.1.2 ABP SHD Ref. 304590-19 - "The Walled Garden", Gort Muire, Dundrum, Dublin 14 (approximately 1.6km to the south)

On the 16th September 2019, ABP granted permission (SHD) for development that will consist of the construction of a residential development of 5-storeys in height over 4 no. blocks on a site of c. 1.0894 ha. Overall, the proposed residential scheme shall provide for 116 residential apartments.

A.1.3 ABP SHD Ref. 311287-21 - No. 97A Highfield Park (D14P710), and No. 1 Frankfort Castle (D14 HY03), No. 2 Frankfort Castle (D14DE72) and Frankfort Lodge (D14C9P2), Old Frankfort, Dublin 14 (approximately 185m to the west)

On the 20th December 2021, ABP granted permission for a development consisting of demolition of No. 97A Highfield Park and annexed structures associated with Frankfort Castle including Frankfort Lodge and the construction of a residential scheme comprising 115 no. units (45 no. one bedroom apartments and 70 no. two bedroom apartments) arranged in 3 no. blocks (Block A – a 4 storey block

over 2 no. basement levels comprising 35 no. units, Block B – a 4/5 storey block comprising 54 no. units and Block C – a 3 storey block comprising 22 no. units) and within the refurbished 2 storey No. 2 Frankfort Castle (Block D- comprising 4 no. units). Vehicular access will be provided via a new access at Old Frankfort with emergency vehicle access only provided via the existing Frankfort Court access.

The development will also consist of the provision of: ancillary residential amenity areas within Block D, a crèche measuring c.80sqm at ground floor level of Block A including associated external play space, cycle parking at surface and ground floor level including sheltered and secure parking, car parking at surface and 2 no. basement levels, electric vehicle charging points, attenuation storage system, waste storage facilities, 2 no. substations, ancillary service and plant areas, hard and soft landscaping, boundary treatments, upgrades to road and pedestrian infrastructure along Old Frankfort and all other site development and drainage works above and below ground.

A.1.4 ABP SHD Ref. 304420-19 – Site at Our Lady's Grove, Goatstown Road, Goatstown, Dublin 14, D14 N8C2 and D14 V290 (approximately 600m to the north-east)

Permission granted on 15 August 2019 for a SHD consisting of the demolition of the existing GAS building (966 sq. m) and the construction of a scheme comprising 132 No. residential units consisting of:

- 19 No. 4-bed, two storey houses;
- 3 No. five storey apartment buildings comprising Block A (38 No. units - 6 No. 1-bed units, 30 No. 2-bed units, and 2 No. 3-bed units); Block B (38 No. units - 6 No. 1-bed units, 30 No. 2-bed units, and 2 No. 3-bed units); and Block C (33 No. units - 6 No. 1-bed units, 21 No. 2-bed units, and 6 No. 3-bed units)); and
- 2 No. 3-bed duplex units above 2 No. 2-bed Ground Floor Level apartments to form a three storey terrace (Block D).

The development includes basement level car parking and the provision of a childcare facility (measuring 434 sq.m).

A.1.5 ABP SHD Ref. 310138-21 – Site at Mount Saint Mary's and Saint Joseph's, Dundrum Road, Dundrum, Dublin 14 (approximately 1.35km to the north)

On the 25th August 2021, ABP granted permission for a SHD scheme, comprising of a new residential and mixed use scheme to include apartments, a central public park, café, afterschool childcare facility, pedestrian routes and associated resident facilities and amenities.

The development provides for the demolition of (a) the existing buildings on site (ranging in height from 1 - 3 storeys) and (b) part of the granite wall along Dundrum Road. The existing Small Hall (approx. 170 sq m) is retained and reconfigured as part of the overall proposal.

The new development will provide for the construction of a new residential scheme of 231 no. apartment units in the form of 5 no. apartment blocks (Villas A to E) ranging in height from 4 to 10 storeys.

The proposal will also provide for a café of approx. 83 sq m at the ground floor of Villa E. Residential amenity areas of approx. 308 sq m are proposed in the form of resident support services and concierge services of approx. 111 sq m at the ground floor of Villa A; a gym room of approx. 77 sq m at the ground floor of Villa D; and a glazed pavilion indoor social space of approx. 120 sq m at the fourth

floor of Villa D. A roof garden residential amenity area of approx. 130 sq m is also proposed at the fourth floor of Villa D. Works to the northern and eastern boundary of Robert Emmet House (a protected structure) include (a) the closing up of opes to the existing Small Hall; and (b) the partial removal of a link between the existing Middle House on site and the adjacent Robert Emmet House (a protected structure) at ground and first floor levels and the subsequent reconfiguration and retention of existing fire escape at ground floor level for this building on the eastern elevation.

Open space (approx. 8,200 sq m) is proposed in the form of (a) a central public park including formal gardens, lawns, play area and pedestrian and cyclist links (approx. 6,300 sq m) and (b) residential / communal open space (approx. 1,900 sq m) including the roof terrace at Villa D (approx. 130 sq m). Basement areas (total approx. 3,372 sq m) are proposed on one level, below Villas A and B, and include parking areas, waste management and plant areas. An ESB substation (approx. 45.5 sq m) and café waste store (approx. 18 sq m) are also proposed at surface level. A total of 118 no. car parking spaces (99 no. at basement level and 19 no. at surface level) are proposed. 20 no. spaces are reserved for Robert Emmet House (10 no. at basement level and 10 no. at surface level). 463 no. bicycle spaces (365 no. at basement level and 98 no. at surface level) and 4 no. motorcycle spaces are proposed (all at basement level).

The development shall be served via the existing vehicular access point from Dundrum Road. Upgrade works are proposed to this vehicular access point to facilitate the proposed development and to provide for improved access and egress for the overall development. New pedestrian and cyclist access points will be provided via Dundrum Road and Churchfields. Future pedestrian links to the Hawthorn Residential Estate can be facilitated subject to third party approval. The associated site and infrastructural works include provision for water services; foul and surface water drainage and connections; attenuation proposals; permeable paving; all landscaping works including tree protection, tree removal and new tree planting; green roofs; boundary treatment; internal roads and footpaths; and electrical services.

Appendix B

Questions to be considered, as per Annex III of Directive 2014/52/EU

Questions to be Considered	Yes / No / ? Briefly Describe	Is this likely to result in a significant impact? Yes/No/? - Why?
<p>1. Will construction, operation, decommissioning or demolition works of the Project involve actions that will cause physical changes in the locality (topography, land use, changes in waterbodies, etc.)?</p>	<p>Yes</p> <p>The existing commercial land use will change to residential use. The development will also require the removal of 8 no. trees that are proposed to be felled (which includes 1 group of 3 no. trees) to accommodate the proposed development, as identified in Section 3 of the accompanying Tree Survey Report.</p>	<p>No</p> <p>The long-term land use and visual impacts are considered to be positive in nature and consistent with the established and emerging urban character of the local context.</p> <p>A number of trees will need to be felled in order to accommodate the proposed development. It is proposed to retain 14 no. trees (70%) of the 20¹ no. trees on and adjoining the site. All of the trees retained are Category A or B trees, which are considered to be of high to moderate quality. Of the 8 no. trees to be removed, which includes TG1 (a group of 3 no. trees) and (T12 to T16), four (4) are category C (low quality trees) and two (2) are category B (moderate quality trees T14 and TG1)). All of the trees to be removed are situated inside the application site boundary. These trees are lower in height averaging about 7m high, so their loss will not have a significant impact on the city leaf-coverage, nor on the landscape and amenity value of the area. Full details of the arboricultural impact assessment are presented in the accompanying Tree Survey Report.</p> <p>In order to offset the tree loss, the landscaping strategy proposes to augment the retention of the good quality mature trees with new tree planting. In this regard the submitted Landscape Strategy and Design Report clarifies that <i>'The proposed landscape plan includes for additional planting of hedgerows and 52 new trees along</i></p>

¹ Note - Tree Group TG1 have been counted as one tree. This group consists of 3 no. trees, as identified in the accompanying Tree Survey Report.

Questions to be Considered	Yes / No / ? Briefly Describe	Is this likely to result in a significant impact? Yes/No/? - Why?
		<p><i>boundary's and within the site, 24 of which will be planted along the northern boundary'.</i></p> <p>It is considered that the implementation of a Construction and Environmental Management Plan (CEMP) will limit any short-term construction related impacts.</p>
<p>2. Will construction or the operation of the Project use natural resources such as land, water, materials, or energy, especially any resources which are non-renewable or are in short supply?</p>	<p>Yes</p> <p>The proposed development will use land, water, construction materials and energy.</p>	<p>No</p> <p>The subject site is an under-utilised, brownfield site. The proposed high density residential scheme will ensure that the best use is made of this finite land resource.</p> <p>It is proposed to use a sustainable urban drainage system (SuDS) approach to stormwater management throughout the site, the overall strategy aims to provide an effective system to mitigate the adverse effects of urban stormwater runoff on the environment by reducing runoff rates, volumes and frequency, reducing pollutant concentrations in stormwater, contributing to amenity, aesthetics and biodiversity enhancement and allow for the maximum collection of rainwater for re-use where possible. Water usage at the operational stage will be via connections to existing services and the level of usage will be of a domestic nature.</p> <p>Construction materials will need to be imported from elsewhere. While some of these materials are non-renewable (such as aggregate), they are not considered to be in short supply.</p> <p>The submitted Energy and Sustainability Report outlines the energy analysis and Part L compliance of the proposed development.</p>

Questions to be Considered	Yes / No / ? Briefly Describe	Is this likely to result in a significant impact? Yes/No/? - Why?
		No significant effects on the environment are anticipated.
3. Will the Project involve the use, storage, transport, handling or production of substances or materials which could be harmful to human health, to the environment or raise concerns about actual or perceived risks to human health?	Yes Some materials used during the construction stage (such as concrete, stone, bitumen, fuel, lubricants, etc.) could be harmful if released into the environment.	No Best practise construction methods and mitigation measures outlined in the submitted CEMP will ensure the proper management and control of hazardous materials. Accordingly, no significant effects on the environment are anticipated.
4. Will the Project produce solid wastes during construction or operation or decommissioning?	Yes Waste will be generated during the construction and operational phases.	No Excavated soil and construction waste will be disposed of in accordance with the provisions of the submitted Construction and Demolition Waste Management Plan, prepared by CS Consulting. Similarly, operational phase waste streams will be dealt with in accordance with the submitted Operational Phase Waste Management Plan, prepared by TMS Environment Ltd. Operational phase waste will be domestic in nature and waste disposal will be through a licensed waste contractor. No significant effects on the environment are anticipated.
5. Will the Project release pollutants or any hazardous, toxic or noxious substances to air or lead to exceeding Ambient Air Quality standards in Directives 2008/50/EC and 2004/107/EC)?	No hazardous, toxic or noxious substances will be released into the air. The most likely air pollutants will be dust particles during the construction phase.	No The development will be constructed in accordance with best practice and specific controls will be put in place to manage the release of pollutants, particularly dust management practices. The construction phase of the proposal will be guided by a

Questions to be Considered	Yes / No / ? Briefly Describe	Is this likely to result in a significant impact? Yes/No/? - Why?
		Construction and Environmental Management Plan (CEMP), prepared by TMS Environment Ltd. Construction works will be carried out in such a way as to limit the emissions to air of pollutants (particularly dust). The site will be managed in accordance with a Construction Waste Management Plan to minimise the potential effects on air quality from construction. The proposed dwellings will be constructed in accordance with the latest building regulations and will employ energy efficient heating and cooling systems that will not give rise to pollution concerns when operational.
6. Will the Project cause noise and vibration or the releasing of light, heat energy or electromagnetic radiation?	Yes Noise and vibration impacts associated with the construction phase of a project of the proposed scale and nature are fairly common. There is also the potential for light pollution from windows and external sources.	No The development will be constructed in accordance with best practice and specific controls will be put in place to manage noise and vibration during the construction phases, as set out under sub-section 4.5.4 of the submitted Construction and Environmental Management Plan. Constructions works could be regulated by means of an appropriate planning condition(s) regulating hours of work on site and permissible noise levels emanating from the site to protect existing residential amenity. Lighting mitigation measures are identified in Section 10 of the submitted Ecological Impact Assessment to mitigate impacts associated with light pollution.
7. Will the Project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters,	Yes During the construction stage there is potential for pollutants to enter the ground and potentially ground water.	No The development will be constructed in accordance with best practice and specific controls will be put in place to avoid ground and groundwater pollution from occurring. Refer to sub-sections 4.1 and

Questions to be Considered	Yes / No / ? Briefly Describe	Is this likely to result in a significant impact? Yes/No/? - Why?
<i>groundwater, coastal waters or the sea?</i>		4.2 of the submitted Construction and Environmental Management Plan
<i>8. Will there be any risk of accidents during construction or operation of the Project that could affect human health or the environment?</i>	Yes, there is potential for accidents during the construction phase of the development.	No The risk of accidents occurring is no greater than any other construction project of the scale and nature proposed. Standard preventative measures are provided as part of the project, which will be carried out in accordance with best practice; and specific controls will be put in place to manage risks. Detailed health and safety measures will be included in a detailed Construction Management plan to be prepared by the Main Contractor prior to the commencement of development.
<i>9. Will the Project result in environmentally related social changes, for example, in demography, traditional lifestyles, employment?</i>	Yes The proposal will deliver an additional 111 new dwellings in the area.	No There will be an increase in population within the area. However, given the existing built-up residential character of the area, it is considered that the proposal is consistent with existing land uses and will not result in significant impacts. In this regard a Social Infrastructure Assessment was undertaken by Future Analytics KPMG and accompanies the planning application.
<i>10. Are there any other factors that should be considered such as consequential development which could lead to environmental impacts or the potential for cumulative impacts with other existing or planned activities in the locality?</i>	Yes, the proposed development is located within an established residential area. A total of 5 no. relevant planning permissions have been identified for residential developments nearby, as set out in Table 3.1 under criteria (b) – see also Appendix A.	No The proposed development forms part of an established urban area of Dublin. Having regard to the planning history set out at Appendix A it is evident that the wider area represents a dynamic and evolving context with a number of projects being progressed at the same time. None of the identified projects at Appendix A are intrinsically linked

Questions to be Considered	Yes / No / ? Briefly Describe	Is this likely to result in a significant impact? Yes/No/? - Why?
		with the subject project. It is unlikely that any significant adverse impacts would occur as a result of other planned activities in the area.
<i>11. Is the project located within or close to any areas which are protected under international, EU, or national or local legislation for their ecological, landscape, cultural or other value, which could be affected by the Project?</i>	Yes, there is a local tree preservation objective attached to the subject site. The subject trees contribute to the biodiversity and landscape value of the site.	No See response to Q1 above in respect of tree retention and removal. See also response to Q13 below for ecological / biodiversity impacts.
<i>12. Are there any other areas on or around the location that are important or sensitive for reasons of their ecology e.g. wetlands, watercourses or other waterbodies, the coastal zone, mountains, forests or woodlands, that could be affected by the Project?</i>	Yes There are a number of high-quality mature trees on the site – see Q1 and Q11 above	No See response to Q1 above in respect of tree retention and removal. See also response to Q13 below in respect of ecological / biodiversity impacts.
<i>13. Are there any areas on or around the location that are used by protected, important or sensitive species of fauna or flora e.g. for breeding, nesting, foraging, resting, overwintering, migration, which could be affected by the Project?</i>	Yes, the site is used by feeding / commuting bats as identified in the submitted Ecological Impact.	No The construction phase will result in: <ul style="list-style-type: none"> • Loss of habitat- A loss of scrub and trees (5 individual trees and one group of trees) that will reduce insect abundance and feeding for birds and bats. However, duration of this impact will be short and reversible as new shrubs and trees will be planted. This impact is not considered to be significant.

Questions to be Considered	Yes / No / ? Briefly Describe	Is this likely to result in a significant impact? Yes/No/? - Why?
		<ul style="list-style-type: none"> • Light disturbance will have consequences for nocturnal mammals, in particular bats (limiting their movement) and daytime birds (changing their activity pattern and sleep pattern). However, given the activity levels of both birds and bats within the site, this would contribute to a short-term moderate negative but reversible impact. This impact is not considered to be significant. • Disturbance of birds nesting within Scrub and Treelines - potential for a negative impact upon nesting birds from vegetation clearance or disturbance associated with works close to Scrub and Treeline habitats. This impact is negative and can lead to a lower number of broods of some bird species. However, this impact is short-term (the period of construction – a minimum of 18 months but unlikely to exceed 30 months) reversible, as birds can nest after the disturbance ceases. • Loss of roost and nest sites for birds - Bird night roosts and nest sites may be temporarily lost through removal of some trees. This is a medium-term reversible impact, as the new tree planting will ensure reinstallation of such sites over time. This impact is not considered to be significant. • Loss of feeding and cover - There will be a limited loss of plant fruit, insect shelter and vegetation that will contribute to a loss of feeding and cover for a wide variety of species. This is a medium-term slight negative but reversible impact on the species within the site. This impact is not considered to be significant. <p>The main impact during the operational phase of the development is disturbance from lighting. Although there is already a high level of light pollution from the data centre on the surrounding vegetation,</p>

Questions to be Considered	Yes / No / ? Briefly Describe	Is this likely to result in a significant impact? Yes/No/? - Why?
		there is the potential that lighting may also decrease if used appropriately. Lighting may affect bat species, in particular, light-intolerant bat species during foraging and if directed at emergence points would affect all bat species, even those that will feed in illuminated areas. This impact is negative, and its duration is expected to be permanent. However, this impact will not be significant provided the recommended lighting mitigation measures as outlined in Section 10 of the submitted Ecological Impact Assessment are properly implemented.
<i>14. Are there any inland, coastal, marine or underground waters (or features of the marine environment) on or around the location that could be affected by the Project?</i>	No	No
<i>15. Are there any areas or features of high landscape or scenic value in or around the location which could be affected by the Project?</i>	No	No
<i>16. Are there any routes or Facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the Project?</i>	No	No
<i>17. Are there any transport routes on or around the location that are susceptible to congestion or which</i>	Yes The site fronts onto the R117	No The development will be constructed in accordance with best practice and specific controls will be put in place to manage congestion

Questions to be Considered	Yes / No / ? Briefly Describe	Is this likely to result in a significant impact? Yes/No/? - Why?
<i>cause environmental problems, which could be affected by the Project?</i>		arising from the construction phase. Transport of construction materials will be necessary but will be subject to agreed working hours. A Traffic and Transport Assessment has been carried out by CS Consulting in respect of the proposal and no significant impact is envisaged.
18. <i>Is the Project in a location in which it is likely to be highly visible to many people?</i>	Yes The site fronts onto the R117	No The visual impact of the construction phase will be temporary and therefore not significant. The proposed design and scale of the development is similar to existing and permitted residential schemes in the wider area and county and is therefore not likely to have a significant environmental impact. The submitted Landscape and Visual Appraisal concludes that: <i>'Given the loss of the existing utilitarian structure and their replicant with a well-designed residential development and well considered elevations, materials and landscape, this would be qualitatively Neutral - Scheme complements the scale, landform and pattern of the landscape(townscape)/view and maintains landscape quality – to Beneficial - improves landscape(townscape)/view quality and character, fits with the scale, landform and pattern'.</i>
19. <i>Are there any areas or features of historic or cultural importance on or around the location that could be affected by the Project?</i>	No	No The submitted Archaeological Impact Assessment identifies the following: <ul style="list-style-type: none"> Recorded Monuments - The subject site is not close to any known sites listed on the Record of Monuments and Places. The closest site is the ecclesiastic enclosure at Taney Dundrum Td (DU022-016001-5) which lies c. 600m distant.

Questions to be Considered	Yes / No / ? Briefly Describe	Is this likely to result in a significant impact? Yes/No/? - Why?
		<p>Dundrum Castle (DU022-023002) lies over 1.2km south-west of the application site.</p> <ul style="list-style-type: none"> • Archaeology – It is considered that there is a very low likelihood of any deposits of archaeological significance remaining on the application site, due to the construction in relatively recent years of the Eir Data Centre. Preparation of the ground for construction of this building, attendant services, drainage and other utilities, will have removed all topsoil and the upper level of subsoil. Any archaeological features which may have been present on the site will have been removed in the construction of the present building. Accordingly, there is no requirement for an archaeological mitigation strategy. • Protected Structures - The nearest Protected Structure to the subject site is Woodlawn House (RPS Ref. 789) that is situated at Churchtown Road Upper, approximately 400m to the south-west of the application site. There are thus no protected structures located within a zone of influence from the application site that could potentially be affected by the proposed development.
20. <i>Is the Project located in a previously undeveloped area where there will be loss of greenfield land?</i>	No	No
21. <i>Are there existing land uses within or around the location e.g. homes, gardens, other private property, industry, commerce, recreation, public open space, community facilities, agriculture,</i>	Yes Rear gardens of adjoining houses adjoin three boundaries of the site.	No The proposed development is likely to result in temporary impacts to the surrounding area during the construction stage, particularly in terms of visual impact; access; noise, dust and general disturbance.

Questions to be Considered	Yes / No / ? Briefly Describe	Is this likely to result in a significant impact? Yes/No/? - Why?
<i>forestry, tourism, mining or quarrying that could be affected by the Project?</i>		<p>Best practice construction methods and management techniques will be employed to ensure no such impacts are significant.</p> <p>Given the predominantly residential character of the surrounding area, it is considered that the operational phase will not result in significant impacts as the proposed land use is consistent with the established character and nature of the area.</p>
22. <i>Are there any plans for future land uses within or around the location that could be affected by the Project?</i>	No	<p>No</p> <p>The project comprises the development of urban land which has been zoned / identified as suitable for residential development. The wider area is established in nature. Whilst there are opportunities for infill development / urban consolidation, such development will be guided by the County Development Plan and the future Dundrum Local Area Plan.</p>
23. <i>Are there areas within or around the location which are densely populated or built-up, that could be affected by the Project?</i>	Yes	<p>No</p> <p>Refer to Q21 above.</p>
24. <i>Are there any areas within or around the location which are occupied by sensitive land uses e.g. hospitals, schools, places of worship, community facilities, that could be affected by the Project?</i>	<p>No</p> <p>Any such uses are physically removed from the site and falls substantially outside the zone of influence of the proposed development.</p>	No
25. <i>Are there any areas within or around the location which contain</i>	Yes, the presence of high-quality trees on site is a scarce and valuable natural	No

Questions to be Considered	Yes / No / ? Briefly Describe	Is this likely to result in a significant impact? Yes/No/? - Why?
<i>important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, that could be affected by the Project?</i>	resource although the subject site is located within an established urban area.	See response to Q1 above in respect of tree retention and removal.
26. <i>Are there any areas within or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, that could be affected by the Project?</i>	No	No
27. <i>Is the Project location Susceptible to earthquakes, subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions e.g. temperature inversions, fogs, severe winds, which could cause the Project to present environmental problems?</i>	No	No

Appendix C

Checklist of Criteria for Evaluating the Significance of Environmental Impacts

The following questions have been considered in the assessment of the significance of environmental impacts:

- 1. Will there be a large change in environmental conditions?*
- 2. Will new features be out-of-scale with the existing environment?*
- 3. Will the impact be unusual in the area or particularly complex?*
- 4. Will the impact extend over a large area?*
- 5. Will there be any potential for transboundary impact?*
- 6. Will many people be affected?*
- 7. Will many receptors of other types (fauna and flora, businesses, facilities) be affected?*
- 8. Will valuable or scarce features or resources be affected?*
- 9. Is there a risk that environmental standards will be breached?*
- 10. Is there a risk that protected sites, areas, features will be affected?*
- 11. Is there a high probability of the effect occurring?*
- 12. Will the impact continue for a long time?*
- 13. Will the effect be permanent rather than temporary?*
- 14. Will the impact be continuous rather than intermittent?*
- 15. If it is intermittent will it be frequent rather than rare?*
- 16. Will the impact be irreversible?*
- 17. Will it be difficult to avoid, or reduce or repair or compensate for the effect?*