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ENVIRONMENTAL IMPACT ASSESSMENT SCREENING REPORT


FOR
PROPOSED STRATEGIC HOUSING DEVELOPMENT

AT


Blackglen Road,
Sandyford,
Dublin 18

ON BEHALF OF
ZOLBURY LIMITED

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1 INTRODUCTION

1.1 Background

Enviroguide Consulting was commissioned by Zolbury Limited to carry out an Environmental Impact Assessment (EIA) Screening for a Proposed Strategic Housing Development. The Proposed Development shall consist of a new residential scheme comprising 360 no. residential units and associated resident amenity facilities and a childcare facility in the form of 9 no. new apartment buildings, on lands at Blackglen Road, Sandyford, Dublin 18.

The purpose of this report is to provide information for the relevant competent authority to carry out the screening for EIA and will highlight if any significant effects, may arise as a result of the Proposed Development during the Construction and Operational Phases.

This EIA Screening concludes that the Proposed Development will not be likely to have significant effects on the environment as detailed in Sections 3.5 to 3.8.

1.2 Project Objective

The overall objective of this EIA Screening is to identify and assess the potential for environmental impact associated with the Proposed Development and to determine if EIA is required for the Proposed Development. The EIA requirement was determined as set out in the mandatory and discretionary provisions of the Planning and Development Act, 2000 (as amended) (the Act) and in Schedule 5 of the Planning and Development Regulations, 2001 as amended (the Regulations). Projects listed in Schedule 5, Part 1, of the Regulations, shall be subject to systematic assessment (Article 4(1) of the EIA Directive) as they are deemed as projects that have significant effects on the environment. Others, listed in the Schedule 5, Part 2 of the Regulations, contain threshold levels and for projects that fall below these thresholds, it is the decision of the competent authority to decide if an EIA (and the associated Environmental Impact Assessment Report (EIAR) is required. Whether a 'sub-threshold' development should be subject to EIA is determined by the likelihood that the development would result in significant environmental effects. Significant effects may arise due to the nature of the development, its scale or extent and its location in relation to the characteristics of the receiving area, particularly sensitive environments.

This report documents the methodology employed to complete the screening exercise, having regard to relevant legislation and guidance documents. It also sets out a clear rationale for each decision of this screening exercise.

1.3 Project Overview

Zolbury Limited intend to apply to An Bord Pleanála for planning permission for a Strategic Housing Development on a site of 3.7 ha at Blackglen Road and Woodside Road, Sandyford, Dublin 18.

The Proposed Development shall consist of a new residential scheme comprising 360 no. residential units, associated resident amenity facilities and a childcare facility in the form of 9 no. new apartment buildings (A1 – C3).

This EIA screening report will address the potential for environmental impacts from the two phases of the project, namely, the Construction Phase and the Operational Phase. Each phase is denoted as the following:

1.3.1 Construction Phase

The Construction Phase will consist of the construction of the Proposed Development. It is expected that the Construction Phase of the Proposed Development will have a duration of approximately 18 months.

Further detail on the proposed construction methodology is presented in the Construction & Environmental Management Plan (O' Connor Sutton Cronin (OCSC), 19th July 2022) provided in the supporting documentation of the submission for the Proposed Development.

1.3.2 Operational Phase

The Operational Phase of the Proposed Development will consist of the normal day to day operations necessary for the ongoing maintenance of residential units, consistent with the neighbouring land use in the area.

2 DESCRIPTION OF THE PROPOSED DEVELOPMENT

2.1 Site Overview

The Proposed Development is bounded by residential properties to the east & west, Blackglen Road to the north, and Woodside Road to the south. The M50 is located 0.7km north from the site. The site's receiving environment – the Blackglen Road corridor west of Lamb's Cross and the triangle of land between Blackglen Road and Woodside Road – is peri-urban in character. The existing site is currently a greenfield site.

The local area in the vicinity of the site includes existing Strategic Housing Developments, agricultural and undeveloped lands. According to the Engineering Services Report (OCSC, 19th July 2022), the site is generally graded towards the north of the site with the highest point of the site being located at the south-west boundary and is approximately +160.12m AOD with the lowest point located at the northeast boundary of the site and is approximately +138.72m AOD. This gives a typical gradient of approximately 8.2% across the site.

Refer to Figure 1 for the Site Location and Figure 2 for the Proposed Site Plan.

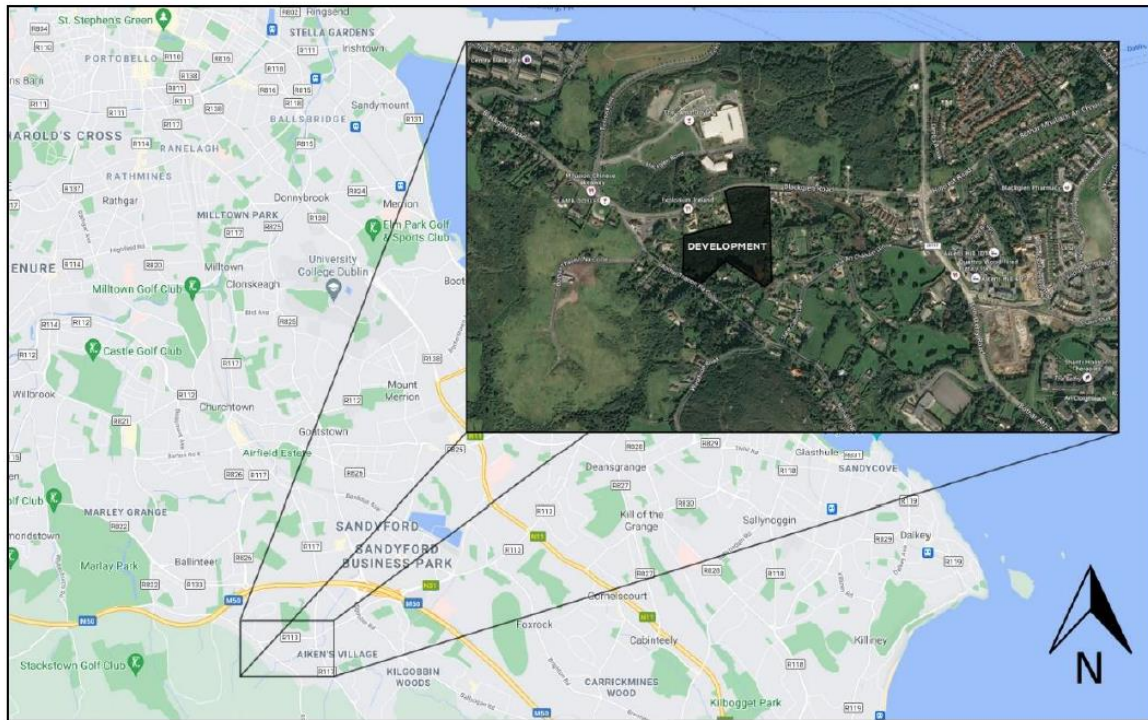


Figure 1 Site Location (Engineering Services Report, OCSC, 19th July 2022)



Figure 2 (Engineering Services Report, OCSC, 19th July 2022)

3 EIA SCREENING PROCESS

3.1 Introduction

The scope of the EIA screening process is to identify any potential significant impacts associated with the Proposed Development that may arise during Construction and Operational Phases as outlined in Section 1.3 Project Overview.

3.2 Legislative Requirements for an EIA

Directive 2011/92/EU was enacted as a means to assess the effects of projects on the environment, and to properly ensure that any potential significant effects are assessed before a project proceeds. Annex I of Directive 2011/92/EU, as amended by Directive 2014/52/EU defines mandatory projects that require an Environmental Impact Assessment Report (EIAR) (formerly EIS) and Annex II lists projects which do not necessarily have significant effects but can be subject to case-by-case analysis or thresholds to be determined by member states. Section 172 of the Planning and Development Act 2000, as amended, provides the legislative basis for mandatory EIA. It states the following:

“An environmental impact assessment shall be carried out by the planning authority or the Board, as the case may be, in respect of an application for consent for proposed development where either —

(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 [(other than subparagraph (a) of paragraph 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 F594 [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, —

(I) 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),

(II) by the Board, in exercise of the powers conferred on it by this Act or those regulations,

(III) by a local authority in exercise of the powers conferred on it by regulation 120 of those regulations,

(IV) by a State authority, in exercise of the powers conferred on it by regulation 123A of those regulations,

(V) in accordance with section 13A of the Foreshore Act, by the appropriate Minister (within the meaning of that Act), or

(VI) by the Minister for Communications, Climate Action and Environment, in exercise of the powers conferred on him or her by section 8A of the Minerals Development Act 1940 ,

that the proposed development is likely to have a significant effect on the environment.”

In some cases, Member States have also established “exclusion” or “negative” lists specifying thresholds and criteria below which EIA is never required or below which a simplified EIA procedure applies. There may be exceptions to the negative thresholds, for example, for projects in defined sensitive locations. Such exceptions will apply in the case of Habitats Directive assessments. The use of exclusion lists, defining thresholds below which EIA is never required, is very limited in the EU Member States.

Schedule 5 of the Planning and Development Regulations 2001-2021 outlines the legislative requirements deeming whether a project needs a mandatory EIA. Projects that automatically require an EIA included in Annex 1 are listed in Part 1 of Schedule 5 to the Planning and Development Regulations. Projects that are assessed either on a case-by-case examination or on the basis of set mandatory thresholds are defined under Annex II of the Directive, and these are transposed in Irish legislation in Schedule 5, Part 2 of the Planning and Development Regulations.

There is no class set out under Part 1 of Schedule 5 in relation to the provision of a Strategic Housing Development. The Planning and Development Regulations 2001 – 2021 Schedule 5, part 2, 10 (b)(i) requires an EIA for the following:

“10. Infrastructure projects

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

The number of dwelling units as part of the Strategic Housing Development include the construction of 360 no. residential units, associated resident amenity facilities and a childcare facility in the form of 9 no. new apartment buildings (A1 – C3). This is below the threshold of 500 units and therefore a mandatory EIA is not required. However, as the Proposed Development is a sub-threshold development, it is therefore required to be screened for EIA under Section 299B of the Planning and Development Regulation 2001-2022.

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.

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

The Proposed Development does constitute an “urban development” as it is a housing development. According to the Interpretation of Definitions of Project Categories of Annex I and II Document (European Commission, 2015), “*Housing developments, in particular, are frequently included in the ‘urban development projects’ category*”. The site of the Proposed Development falls under the Dún Laoghaire-Rathdown Development Plan 2022-2028 Zone A: “*To provide residential development and improve residential amenity while protecting the existing residential amenities*”.

The Proposed Development is not considered to be within a “business district” as defined in the Regulations. Therefore, the 2 hectare threshold is not applicable in this case, and the 10-hectare threshold applies instead. Furthermore, as the total area of the site for development has been confirmed as 3.7 hectares, it is less than the 10-hectare threshold for a built-up area and accordingly, a mandatory EIA is not required. However, as the Proposed Development is a sub-threshold development, it is therefore required to be screened for EIA under Section 299B of the Planning and Development Regulation 2001-2022.

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 will be reviewed having regard to the criteria set out in Schedule 5 Part 2, (10)(b)(i), (10)(b)(iv) and Schedule (15). The findings of this review will be detailed in this report’s conclusions.

As this Proposed Development is significantly below the threshold specified in the above Classes or the Classes do not apply, it is considered a sub-threshold development on these grounds. Therefore, the Proposed Development does not meet the thresholds to require a mandatory EIA as per Schedule 5 of the Planning and Development Regulations and is considered to be a sub-threshold development in the context of Irish legislation.

The criteria as set out in Schedule 7 and Schedule 7A has been incorporated into this EIA screening. This EIA Screening concludes that the Proposed Development will not be likely to have significant effects on the environment as detailed in Sections 3.5 to 3.8.

Table 1 provides a summary of the legislative requirements for an EIA:

Table 1 Summary of EIA Activities

Class of Activity	Description of Activity Class	Summary Comments	EIA Required?
<i>Schedule 5 Part 2 10. (b) (i)</i>	<i>Construction of more than 500 dwelling units.</i>	The number of dwelling units as part of the Strategic Housing Development include the construction of 360 no. residential units.	Mandatory EIA not required but has to be screened for EIA as a sub-threshold development
<i>Schedule 5 Part 2 (10)(b)(iv)</i>	<i>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.</i>	The Proposed Development is not considered to be within a “business district” - therefore, the 2-hectare threshold is not applicable in this case. Proposed Development does not exceed the 10-hectare threshold of a built-up area. The total site area is 3.7 hectares.	Mandatory EIA not required but has to be screened for EIA as a sub-threshold development
<i>Schedule 5 Part 2 15</i>	<i>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.</i>	The Proposed Development will be reviewed having regard to the criteria set out in Schedule 5 Part 2, (15). The findings of this review will be detailed in this report’s conclusions.	To be determined by this EIA Screening

3.3 EIA Screening

The process of evaluating the likelihood of a project listed in Annex II requiring an assessment is called Screening. Figure 3, from The Environmental Impact Assessment of Projects, Guidance on Screening (European Commission, 2017), provides the steps involved in the Screening process.

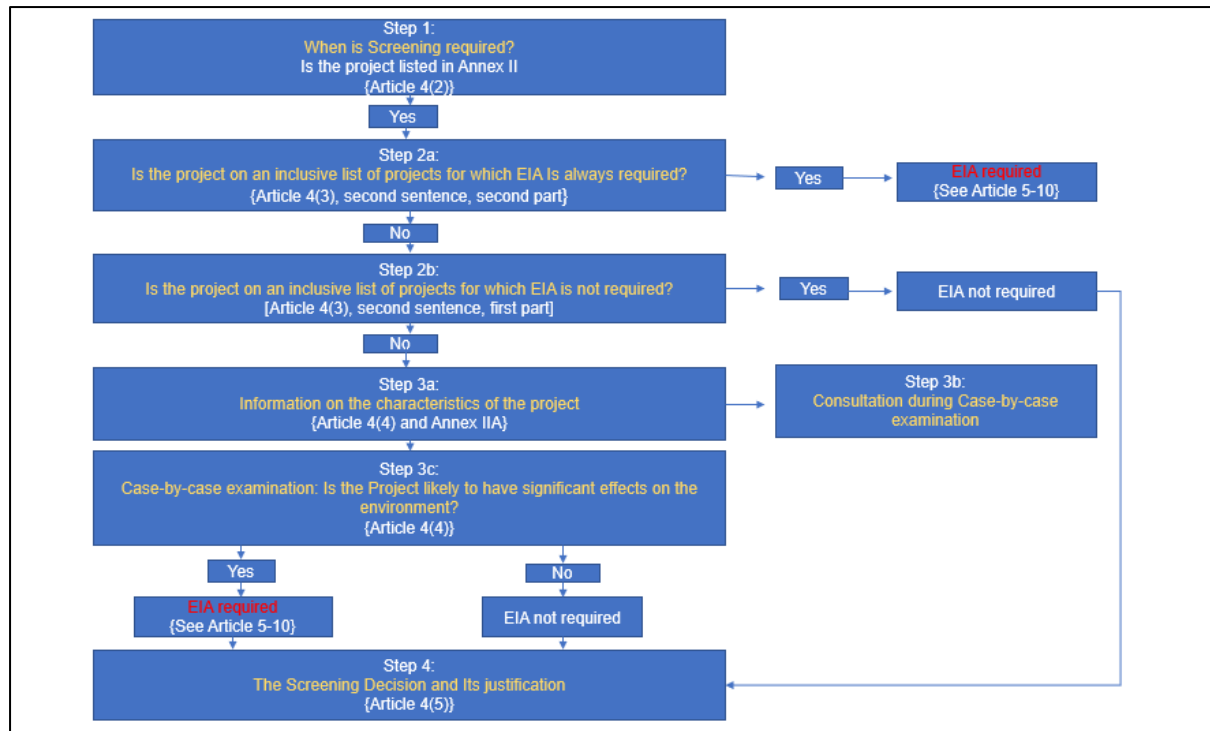


Figure 3 Flow Diagram of the Steps in Screening

(Source: European Commission Environmental Impact Assessment of Projects, Guidance on Screening, 2017)

3.4 Sub-Threshold Development

Sub-threshold development may still require an EIA process to be completed. The most important element to address in the assessment of a sub-threshold development and its requirement for an EIA is the likelihood of a project having any significant effects on the environment. In order to provide guidance on this, criteria have been transposed into Irish legislation and set out in Annex III of the EIA Directive, it is also set out in Schedule 7 and Schedule 7A to the Planning & Development Regulations 2001-2022. Within Annex III of the EIA Directive 2014/52/EU, the characteristics under which a project must be considered in order to determine if an EIA is required includes:

1. The size and design of the Proposed Development;
2. The nature of any associated demolition works,
3. The use of natural resources, in particular land, soil, water and biodiversity;
4. The production of waste;
5. Pollution and nuisances;
6. 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;
7. The risks to human health (for example due to water contamination or air pollution);
8. The existing and approved land use;
9. The relative abundance, availability, quality and regenerative capacity of natural resources;

10. The absorption capacity of the natural environment, paying particular attention to the following areas
 - i. wetlands, riparian areas, river mouths;
 - ii. coastal zones and 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;
 - 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.
11. The magnitude and spatial extent of the impact;
12. The Nature of the Impact;
13. The transboundary nature of the impact;
14. The intensity and complexity of the impact;
15. The probability of the impact;
16. The expected onset, duration, frequency and reversibility of the impact;
17. Cumulation with other existing development and/or development the subject of a consent; and
18. The possibility of effectively reducing the impact.

The above criteria, as transposed in Irish legislation, are grouped under three main headings, as follows:

1. Description of the Proposed Development;
2. Location of the Proposed Development; and
3. Characteristics of the Potential Impacts.

In addition, the European Commission publication *Environmental Impact Assessment of Projects, Guidance on Screening* (2017) contains helpful checklists such as “Screening Checklist” and the “*Checklist of Criteria for Evaluating the Significance of Environmental Impacts*”, that are beneficial in aiding the production of screening for an EIA, as is the Irish Government’s 2018 publication, “*Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment*”.

3.5 Characteristics of the Proposed Project

3.5.1 Size and Design of the Proposed Development

Zolbury Limited intend to apply to An Bord Pleanála for planning permission for a Strategic Housing Development on a site of c. 3.7 ha at Blackglen Road and Woodside Road, Sandyford, Dublin 18. The development shall consist of a new residential scheme comprising 360 no. residential units, associated resident amenity facilities and a childcare facility in the form of 9 no. new apartment buildings (A1 – C3) as follows:

Block A1 (4 storeys) comprising 18 no. apartments (3 no. 1 bed units and 15 no. 2 bed units); a crèche facility of approx. 401 sq. m with associated outdoor play space of approx. 20 sq. m; and resident amenity facilities of approx. 30 sq. m.

Block A2 (3-4 storeys) comprising 24 no. apartments (2 no. 1 bed units and 22 no. 2 bed units) and resident amenity facilities of approx. 390m².

Blocks B1 and B2 (2-6 storeys) comprising 69 no. apartments (30 no. 1 bed units, 34 no. 2 bed units, 5 no. 3 bed units).

Blocks B3 and B4 (2-6 storeys) comprising 62 no. apartments (30 no. 1 bed units, 27 no. 2 bed units and 5 no. 3 bed units).

Blocks C1, C2 and C3 (3-6 storeys) comprising 187 no. apartments (58 no. 1 bed units, 126 no. 2 bed units and 3 no. 3 bed units); and resident amenity facilities of approx. 187.5 sq. m.

Each residential unit is afforded with associated private open space in the form of a terrace / balcony.

Total Open space (approx. 22,033 sq. m) is proposed in the form of public open space (approx. 17,025 sq. m), and residential communal open space (approx. 5,008 sq. m).

Podium level / basement level areas are proposed adjacent to / below Blocks A2, B1, B2, B3, B4, C1, C2 and C3 (approx. 12,733 sq. m GFA). A total of 419 no. car parking spaces (319 no. at podium/basement level and 100 no. at surface level); to include 80 no. electric power points and 26 no. accessible parking spaces); and 970 no. bicycle spaces (740 no. long term and 230 no. short term), and 19 no. Motorcycle spaces are proposed. 10 no. car spaces for creche use are proposed at surface level.

Vehicular/pedestrian and cyclist access to the development will be provided via Blackglen Road to tie in with the Blackglen Road Improvement Scheme. A second access is also proposed via Woodside Road for emergency vehicles, pedestrian and cyclist access only.

The proposal also provides for Bin Storage areas and 4 No. ESBN substations to supply the development. 3 no. sub-stations shall be integrated within the building structures of Blocks B and Blocks C. In addition, one Sub-station shall be classed as a unit sub-station mounted externally on a dedicated plinth.

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; green roofs; boundary treatment; internal roads and footpaths; electrical services; and all associated site development works.

The site is located 400m from a busy Neighbourhood Centre at Lamb's Cross. This Neighbourhood Centre currently provides a convenience retail store, a butcher, a vet and a hairdresser. To the east of the Blackglen Road frontage is a 'run' of 5 no. semi-detached and detached cottages and gardens of large, detached houses of one and two-storey height which appear to generally date from recent decades. (Planning Report, Brock McClure, August 2022).

3.6 Site Planning History

The site of the Proposed Development is currently greenfield in nature. The site is within the administrative jurisdiction of Dun Laoghaire-Rathdown County Council.

Planning Reg. Ref: D07A/0425 & ABP PL06D.223989 - Subject Lands

Under Planning Reg. Ref. D07A/0425, on 24th May 2007 Dun Laoghaire-Rathdown County Council refused permission for a residential development comprising 130no. apartments arranged in 4no. blocks ranging in height from 3 to 4 floors, over lower parking level, 58no. duplex apartments arranged in 7no. blocks of 3 floors, and 36no. houses arranged in 5no. terraced blocks of 4 units, 2no. terraced blocks of 3 units and 5no. pairs of semi-detached (in total 224no. residences) with an underground car park for 149 cars, and surface parking for 206 cars (total 355 cars). a crèche (floor area 254sqm) and a new vehicular entrance onto Blackglen Road, ESB sub-station and a switch room (22sqm) and for all new walls and boundaries, landscaping, refuse stores, roads, footpaths, services on and underground, and all other development on a site of area 3.693 hectares (9.125 acres) at the main location.

The decision was appealed by the applicant to An Bord Pleanála, but this appeal was subsequently withdrawn.

Reg. Ref.: D07A/1598 & ABP PL06D.227869 - Subject Lands

Under Planning Reg. Ref. D07A/1598, on 19th November 2007, Dun Laoghaire-Rathdown County Council and An Bord Pleanála refused permission for a residential development comprising 36 no. three bedroom plus study two storey dormer semidetached terraced houses. 2 no two storey, dormer terraced houses, and 142 no apartments arranged in 11 no. 3 storey and 3 storey plus dormer blocks, consisting of 50 no. three bedroom duplex apartments, 70 no. two bedroom apartments, and 22 no one bed apartments, (total 180 no. residences) with surface car parking for 282 cars, a single storey crèche (floor area 262sq.m.) and for a new vehicular entrance onto Blackglen Road ESB substation and switch room (22 sq.m.) and for all new walls and boundaries, landscaping refuse stores, recycling centre roads, footpaths, services on and underground, and for all other development on a site of area 3.693 hectares (9.125 acres) at Blackglen Road and Woodside Road. This planning application was refused based on the following grounds:

"Having regard to the location of the site in a transitional zone between the built up area and an area of high amenity at the foothills of the Dublin Mountains, the elevated and exposed nature of the site and the pattern of development in the area, it is considered that by reason of the height, scale, bulk and design the proposed development would create a highly prominent and unduly obtrusive feature on the landscape resulting in an adverse visual impact on the overall area and seriously injuring the character of the area. The proposed development would be visually obtrusive and is therefore contrary to the proper planning and sustainable

development of the area. 2. The vehicular entrance to serve the proposed development accesses onto the Blackglen Road: It is an objective of the 2004 County Development Plan to upgrade this road. The existing Blackglen Road is substandard to serve the scale of development proposed. The proposals for the Blackglen Road / Harold's Grange Road improvement scheme have not been finalised. The proposed development is therefore premature pending the finalisation of details for the Blackglen Road upgrade. The proposed development would endanger public safety by reason of traffic hazard or obstruction of road users or otherwise. 3. Having regard to the location of the site remote from a major public transportation corridor, employment centre and district / town centre shopping facilities, the lack of pedestrian and cycle linkages to existing service centres, the inadequacy of the existing road network and the settlement character of the area, it is considered that by reason of its scale and density the proposed development would result in an unsustainable form of development at this scenic rural location at the foot of the Dublin Mountains and would, therefore, be contrary to the proper planning and sustainable development of the area. 4. The public notices state that there are 142 no. apartments and 38 no. dwelling houses (semi-detached and terraces) proposed. However, the site layout plan and drawings submitted indicate that development comprises of 144 no. apartments and 36 no. dwelling houses. The public notices are misleading and are therefore contrary to Article 18 (1) (d) of the Planning and Development Regulations 2001 - 2007. 5. The area of private open space identified to serve a number of the proposed dwelling houses is below the minimum 60 square metres as required by Section 5.5.7 of the County Development Plan. The quality of the public open space is considered to be substandard based on the location, the lack of passive surveillance, the absence of play facilities and the unsuitability of the landscape proposals. The proposed development is therefore contrary to the proper planning and sustainable development of the area."

Reg. Ref.: D08A/1347 Subject Lands

Under Planning Reg. Ref. D08A/1347, on 12th February 2009, Dun Laoghaire-Rathdown County Council refused permission for the provision of a new vehicular entrance for access and maintenance purposes onto Blackglen Road; the removal of the existing boundary wall fronting the site boundary and its replacement with a stone boundary wall; and associated hard and soft landscaping. This planning application was refused based on the following grounds:

"The proposed vehicular entrance accesses onto the Blackglen Road. It is an objective of the County Development Plan 2004 - 2010 to upgrade this road. The proposals for the Blackglen Road / Harold's Grange Road improvement scheme have not been finalised. In the absence of the road improvement scheme the proposed entrance has inadequate sightlines. The scale of the proposed entrance is considered excessive for the requirements of maintenance access. The proposed development is therefore premature pending the finalisation of details for the Blackglen Road upgrade. The proposed development would endanger public safety by reason of traffic hazard or obstruction of road users or otherwise."

Reg. Ref.: D16A/0493 Subject Lands

Under Planning Reg. Ref. D16A/0493, on 23rd August 2016, Dun Laoghaire-Rathdown County Council refused permission for the provision of a new vehicular access; the removal of a portion of the boundary fence (rubble wall); provision of a 5-metre-wide gate set back 6 metres from the public road and a post and wire fence, not exceeding 1.5 metres in height, between

the proposed gate and the existing boundary fence at Blackglen Road. This planning application was refused based on the following grounds:

“The proposed new vehicular access is deemed premature pending the upgrade of the Blackglen Road and would endanger public safety by reason of the traffic hazard it would create by the traffic generated by the proposed new vehicular access, at both construction and operational stages on the adjoining Blackglen Road which, in its existing condition, is substandard in terms of alignment and width and would set an undesirable precedent for similar proposals along this heavily trafficked route. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.”

3.6.1 Cumulation with Other Projects

Cumulative Impacts can be defined as “*impacts that result from incremental changes caused by other past, present or reasonably foreseeable actions together with the project*”. Effects which are caused by the interaction of effects, or by associated or off-site projects, are classed as indirect effects. Cumulative effects are often indirect, arising from the accumulation of different effects that are individually minor. Such effects are not caused or controlled by the project developer.

Plans and projects in the surrounding area that could have the potential to result in cumulative impacts were reviewed from data sources including:

- Dun Laoghaire-Rathdown County Council website:
<https://wicklow.maps.arcgis.com/apps/webappviewer/index.html?id=57b22c27e7c049fbac54117da1a20f60>
- An Bord Pleanála website, <http://www.pleanala.ie/>.
- EIA Portal, as provided by the Department of Housing, Planning and Local Government: <https://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=d7d5a3d48f104ecbb206e7e5f84b71f1>.

Any planning applications listed as granted or decision pending were assessed for their potential to act in-combination with the Proposed Development and cause likely significant effects on the relevant European Sites (Table 2). Long-term developments granted outside of this time period were also considered where applicable.

Table 2 Potential Cumulative Impact with nearby developments

Application Reg. Ref.	Applicant	Address	Development Proposal	Decision
D20A/0525	Kevin and Ann Cullen	Sliding Rock, Blackglen Road, Sandyford, Co. Dublin	Permission for a proposed development comprising of the proposed conversion of an existing detached garage into an accessible bedroom & en-suite bathroom including minor alterations to elevations together with a single storey link to the main dwelling house.	GRANT 17 Sep 2020
D19A/0769	Andrew & Dara Tighe	Plot 'B' at 'Barroque' & 'The Nook', Woodside	Permission for development. The development will consist of the demolition of 2 no. dwellings known as 'Barroque' & 'The Nook', Construction of 1 no. two storey detached dwelling	GRANT 15 Jan 2020

Application Reg. Ref.	Applicant	Address	Development Proposal	Decision
		Road, Sandyford, Dublin 18	(232m.sq.), alterations to front boundary treatment including vehicular entrance and associated site works.	
D21A/0337	Irene and Diarmuid Coogan	Shelmalier, Slate Cabin Lane, Sandyford, Dublin 18	Retention Permission is sought for the replacement of an old septic tank and failed sub surface percolation area with a new tertiary on site wastewater treatment system.	GRANT 15 Jul 2021
D20A/0620	Ciaran & Roisin Greenan	Rock Lodge, Slate Cabin Lane, Sandyford, Dublin 18	Permission is sought for a development consisting of (i) construction of a new adapted, 3-bedroom, dormer bungalow with garage and sensory garden (ii) provision of new wastewater treatment system (iii) new boundary fence and new entrance for existing house to adjoining lane, at Rock Lodge, Slate Cabin Lane, Sandyford, Dublin 18. The development also includes landscaping, SuDS drainage and all ancillary works necessary to facilitate the development.	GRANT 03 Dec 2020
D20A/0600	Tommy Moran and Sarah Moran	Jennings Field, Balally Hill Townland, Facing onto Woodside Road, Sandyford, Dublin 18, D18 R2P3	Permission is sought for a single-storey extension, including one new rooflight, to the side and rear of the existing house (previous planning permission reg ref D19A/0518), and a single-storey ancillary building accommodating games room, gym and garage, including one new rooflight, to the rear and side of the existing house, a single storey porch extension to the front of the house, and works to the existing entrance of the property including proposed stone wall and pillars, alterations to existing site boundary and all associated site works including drainage of the surface to soakaways and utilising the existing waste treatment plant.	GRANT 28 Jan 2021
D21A/0521	June McCarthy	Woodside Lodge, Cullens Way, Woodside Road, Sandyford, D18 Nw18	Permission for the single storey extension to side and front with internal alternation windows to the existing property, moving the front entrance, upgraded waste treatment system and associated site works.	GRANT 02 Sep 2021
D19A/0729	The Board of Management, St. Mary's NS.	St. Mary's National School, Lambs Cross, Sandyford, Co. Dublin.	Permission to remove 3No. single storey prefabricated buildings and the single storey shed structure to the rear/western/northern side of the existing school building in order to construct a new two storey extension in that location. The proposed extension will accommodate 2No. Classrooms, 5No. Resource Rooms, a new staff room, an Accessible Toilet, Staff Toilets and other	GRANT 26 Feb 2020

Application Reg. Ref.	Applicant	Address	Development Proposal	Decision
			ancillary areas including an internal landscaped Open Well, a new Boiler House, a Storeroom and a new exit/accommodation Staircase. The works will also include modifications to the Reception Office at ground floor level within the return building and to the Toilet accommodation at both levels within the main school building.	
D19A/0744	Sandyford House Redevelopment Ltd.	Site to the east of Sandyford Road (Coolkill), Sandyford, Dublin 18	Permission for development. The development will consist of: the construction of 15 no. dwellings comprising 1 no. 1.5 storey 3-bedroom detached dwelling (Type A), 1 no. 1.5 storey 3-bedroom detached dwelling (Type E), 1 no. 1.5 storey 3-bedroom detached dwelling (Type F), 1 no. 1.5 storey 4-bedroom detached dwelling (Type D), 1 no. 2.5 storey 5-bedroom detached dwelling (Type B), 2 no. 2.5 storey 5-bedroom detached dwellings (Type C), 2 no. 2.5 storey 5-bedroom detached dwellings (Type H) and 6 no. duplex units in a single 3 storey block (Type G), consisting of 3 no. 2 bedroom ground floor and 3 no. 3 bedroom upper floors units with vehicular and pedestrian access from the Sandyford Road (Coolkill), including all associated on and off site development works, car parking, soft and hard landscaping pedestrian/cycle link to south-eastern boundary, boundary treatments and 225 mm dia. outfall foul sewer of circa 180 m, which will discharge into the existing foul manhole at Kilcross housing estate to the west of the subject site all on overall application site circa 0.49ha.	GRANT 02 Sep 2020
D17A/1003 ABP-302954-18	C/o B & C Contractors Monaghan Ltd	Site known as Whinsfield, Sandyford, Dublin 18	Permission for a residential development consisting of the demolition of the existing dwelling house and sheds and the construction of 67 no. apartments in 3 no. three storey plus penthouse blocks (Blocks A, B & C) containing in total 5 no. one bed units, 48 no. two bed units and 14 no. three bed units. The development will also include a basement (under blocks B & C), on surface car parking, the construction of a new site entrance from the public road and all associated site and landscaping works on a 1.09 hectare site.	GRANT 16 Oct 2018
D17A/0400	Shane Fitzpatrick	Cuinne Geal, Slate Cabin Lane, Sandyford, Dublin 18	Permission for the construction of a new 2 bedroom detached bungalow with car parking to the front and patio areas, new effluent treatment system, entrance gates and gate pillars, and new boundary fencing/native hedging and all ancillary site works.	GRANT 28 Mar 2018

Application Reg. Ref.	Applicant	Address	Development Proposal	Decision
D22A/0365	Pathway Homes Ltd.	Blackglenn Road, Sandyford, Dublin 18 (Four Winds site)	Permission for a residential development. The development will consist of the following: 1. The provision of 46 no. residential units comprising 36 no. apartment units in a 4-storey block comprising: 2 no. 1 bedroom apartments 26 no. 2 bedroom apartments 8 no. 3 bedroom apartments in one residential 4 story block 10 no. duplex apartment units in a 3-storey block comprising: 5 no. 1 bedroom duplex apartments 5 no. 3 bedroom duplex apartments 2. The demolition of existing derelict dwelling house on the application site (floor area approx. 243 sq.m) 3. Provision of upgraded vehicular and pedestrian access to the application site from the Blackglenn Road and new internal access road and footpaths. 4. Provision of 50 no. car parking spaces including 3 no. accessible spaces and 10 no. EV parking spaces. 5. Provision of Bike Storage Area (40 sq.m) and external bike rack providing a combined 60 no. bicycle spaces. 6. Provision of Bin Storage Area (24 sq.m) 7. Provision of shared communal and private open space (including children's play area), public lighting, site landscaping, connection to existing services, footpath connections, signage and all associated site development works.	Registered 26th May 2022 REFUSE PERMISSION on 29th July 2022
D21A/0383 ABP Reference - ABP-310859-21	Maria Byrne	"Rockbrook House", Blackglenn Road, Sandyford, Dublin 18	Permission for development. The development will consist/consists of The sub-division of an existing site for the construction of a detached two storey house, connection to public foul sewer and utilisation of existing vehicular entrance and all associated site works.	REFUSE PERMISSION on 23rd Jun 2021 Appeal granted on 17th Feb 2022
ABP313321 22	Heronbrook Properties Limited	1.938 ha at Balally and Woodside at Blackglenn Road and Slate Cabin Lane, Dublin 18	Permission for Strategic Housing Development consists of demolition of the existing, derelict, former residential structures on the site and construction of 101no. residential units and a creche (13,127 sq m gross floor area in total). The residential element comprises a mix of houses (9no. 2-beds, 16no. 3beds, 6no. 4 beds and 1 no. 5 beds); duplexes (3no. 2 beds and 10no. 3 beds) and apartments (14no. 1 beds, 35no. 2 beds and 7no. 3 beds). The houses are provided in 2 storey terraces and include one dormer-style unit. The duplexes and apartments are provided in 2no. blocks (A and B) connected by a landscaped podium with undercroft car parking level (including plant/stores). Block A is 3-4 storey in height and contains 52no. apartments. It has frontage to Blackglenn Road. Block B is to the rear and contains 13no. duplexes and 4no. apartments.	Registered application Registered 13th April 2022

Application Reg. Ref.	Applicant	Address	Development Proposal	Decision
			<p>It is 3-4 storeys in height. All houses are provided with private rear gardens and all apartments and duplexes are provided with private terraces or balconies. The creche (109.6 sq. m) is located in Block B and includes a dedicated open space of 120 sq m. The development includes 2no. ESB Substations (c. 16 sq. m each) and bin stores (c. 22.5 sq. m). The roof of Block A includes a green sedum roof and photovoltaic panels. Public open space is provided in 3no. separate areas, with a total of 3,559 sq. m provided. 1,458 sq.m of semi-private communal open space is provided at podium level between Blocks A and B. Road infrastructure works proposed on site to include new internal access road, cycle and pedestrian facilities. 1no. new vehicular access to the scheme from Blackglen Road (currently subject of improvement works) with dedicated pedestrian and cycle access, 2no. additional, dedicated pedestrian accesses to the site from Blackglen Rd and 1no. new pedestrian and cycle access to the site from Slate Cabin Lane. 170no. car parking spaces, including: 83no. spaces at undercroft level and the remaining 87no. spaces at surface level. 5no. motorcycle spaces are provided at undercroft level. 152no. bicycle parking spaces are provided, of which 126no. are provided within the undercroft (includes 2no. cargo cycle spaces). The remaining 26no. spaces are provided at surface level in a covered cycle store. And, all associated and ancillary site development and infrastructural works, hard and soft landscaping and boundary treatment works, including drainage and SUDS infrastructure. The application contains a statement setting out how the proposal is consistent with the objectives of the Dún Laoghaire - Rathdown County Development Plan 2016 – 2022 (currently in force) and the Dún Laoghaire - Rathdown County Development Plan 2022 – 2028 (adopted, not yet in force). The application contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act, 2000, as amended, notwithstanding that the proposed development materially contravenes a relevant development plan or local area plan other than in relation to the zoning of the land.</p>	

Application Reg. Ref.	Applicant	Address	Development Proposal	Decision
D22A/0186 (ABP Reference - APB-313688-22)	Sinead O'Hanlon	The Hollies, Cullen's Way, Woodside, Dublin 18	Permission is sought for a single storey 2-bed private house, with another part of the house proposed to be used as a Bed and Breakfast business comprising; 2no. en-suite bedrooms, a living and dining room, and all associated site works including modifications to the existing site entrance and a new wastewater treatment system.	REFUSE PERMISSION on 05th May 2022 *Application under appeal

ABP 313443-22

In April 2022, an application was lodged with An Bord Pleanála for the permission for a SHD Development. The proposed development principally consists of the demolition of the existing dwelling and ancillary buildings known as 'Glenina', the existing dwelling known as 'Karuna' and the existing boundary wall fronting Sandyford Road, and the construction of a residential development principally comprising 137 No. apartments (32 No. 1-bed units, 78 No. 2-bed units and 27 No. 3-bed units) in 4 No. blocks ranging in height from part-1 No. storey to part-6 No. storeys with a part-basement/part-undercroft level (at Blocks B, C and D).

This is due to be decided by 17th August 2022.

It is considered that cumulative impacts are most likely to arise due to potential pollution and nuisances. Good construction management practices, as detailed in the Site-Specific Construction and Demolition Waste Management Plan (CDWMP) (OCSC, 19th July 2022) and Construction and Environmental Management Plan (CEMP) (OCSC, 19th July 2022) will minimise the risk of pollution from construction activities at the site. The works will also be carried out in such a way that inconvenience to the public arising from increase in traffic flows and disruptive effects of construction traffic on local and main roads is limited wherever practical. In addition, transport infrastructure in the area is due to be imminently upgraded by way of the Blackglenn Road Improvement Scheme. This Scheme is now underway and includes new bus stops and cycle lanes along Blackglenn Road that will directly enhance the accessibility and connectivity of the subject site. The improved connectivity of the site enables the delivery of residential units in accordance with national planning policy. In addition, the upgrade works to Sandyford Road consist of approximately 2.2 km of road upgrade to include Bus Priority measures and Bus Lanes, cycle paths and footpath upgrade works. As detailed in the accompanying Traffic Impact Assessment by O'Connor Sutton Cronin (19th July 2022), the Proposed Development incorporates the proposed improvement works into the design of the SHD (Planning Report, Brock McClure, August 2022). Specific to this site, walkways and cycle lanes will be added to both sides of the road adjacent to the site frontage. These upgrades will tie into the larger network and provide access to a variety of public transport services, including bus routes and the Luas Green Line (Traffic Impact Assessment, OCSC, 13th June 2022).

Likewise, the CEMP will ensure that Proposed Development works on site and associated construction traffic movements will fully align and will not impede any nearby road improvement works.

The main vehicular access to the development car park will be via Blackglen Road. The car park on the eastern side of the development site will access directly onto Blackglen Road. This will be a very low-volume movement, with the majority of vehicles accessing the development via the main entrance. Additional access will be available via Woodside Road, although this access is only for emergency purposes and will not allow vehicular access under normal conditions. Refer to Figure 4 for the Proposed Site Plan. It should be noted that the reason why this second access is required is due to the topography of the site, this is discussed in further detail in the Traffic Impact Assessment Report (OCSC, 19th July 2022) and the Response Letter 'PAC/SHD/108/21-Response to DLR Transportation Planning Report, 16.06.2022', that will be submitted as part of this planning application. The Traffic Impact Assessment concluded that the local road network is capable of catering for the additional traffic associated with the Proposed Development without significant negative impact.



Figure 4 Proposed Site Plan (O'Mahony Pike)

In conclusion, due to the full implementation of management controls to avoid adverse environmental impacts from the current Proposed Development and the proposed off-site projects, it is not expected that cumulative impacts from these developments are likely to result in significant adverse effects on the environment.

3.6.2 Relevant Policies and Plans

The following policies and plans were reviewed and considered for possible in-combination effects with the Proposed Development.

- Proposed Dun Laoghaire-Rathdown Blackglen Road/Harold's Grange Road Improvement Scheme;
- Dun Laoghaire Rathdown Development Plan 2022-2028;
- Dun Laoghaire Rathdown Biodiversity Plan 2009-2013;
- Dun Laoghaire Rathdown Development Plan 2022-2028 Strategic Environmental Assessment (SEA); and
- Dun Laoghaire Rathdown Development Plan 2022-2028 [Strategic Flood Risk Assessment].

It is considered that there will be no likely significant cumulative effects on the environment or sensitive receptors when the proposed Strategic Housing Development commences. The most significant potential for adverse cumulative impacts in combination with other projects in the area is in the potential for water pollution, noise, dust, increased traffic. However, the adherence and full implementation of the appropriate mitigation measures will ensure there is no potential for cumulative impacts to arise.

The Proposed Dun Laoghaire-Rathdown Blackglen Road/Harold's Grange Road Improvement Scheme entails the upgrade of 2.02 km of road, and includes the following transport infrastructure related items:

- Construction of pavement, footpaths and cycle lanes which are currently not present along Blackglen Road;
- Upgrading of existing signalized junctions at Lambs Cross and Grange Road/Harold's Grange Road/Kellystown Road/College Road and new toucan crossing on Blackglen Road; and
- Upgrading of bus stops on Blackglen Road, Sandyford Road and Enniskerry Road.

The construction of the Proposed Development will only commence following the completion of the Blackglen Road Improvement Scheme, however consultation with the various stakeholders will be actioned during the Detailed Design Stage (Statement of Response to An Bord Pleanála Opinion, Brock McClure, August 2022)

There is potential for proposed plans and projects within the Dun Laoghaire Rathdown Development Plan 2022-2028 land area, to have cumulative, negative impacts on conditions in Dublin Bay via rivers, other surface water features, and foul waters treated at wastewater treatment facilities. However, the core strategy, policies and objectives of the Dun Laoghaire Rathdown Development Plan 2022-2028 have been developed to anticipate and avoid the need for developments that would be likely to significantly affect the integrity of any European site.. Furthermore, such developments are required to conform to the relevant regulatory provisions for the prevention of pollution, nuisance or other environmental effects likely to significantly affect the integrity of Natura 2000 sites. In addition, sustainable development

including SuDS measures for all new developments is inherent in the objectives of all development plans within the Greater Dublin Area. Therefore, there is no potential for significant in-combination impacts to arise due to surface water discharges during the Construction and Operational Phases of the Proposed Development.

3.6.3 Zoning

The site of the Proposed Development is located within the Dun Laoghaire and Rathdown zoning objective 'A'. The objective of this zoning directive is *"To provide residential development and improve residential amenity while protecting the existing residential amenities"* within the Dun Laoghaire and Rathdown Development Plan 2022-2028. The Proposed Development is considered to be located in a 'Transitional Zone' between the built-up urban areas and the high amenity lands at the foothills of the Dublin Mountains. According to the Planning Report (Brock McClure, June 2022), the Proposed Development is considered to be a positive contribution to this particular Transitional Zone.

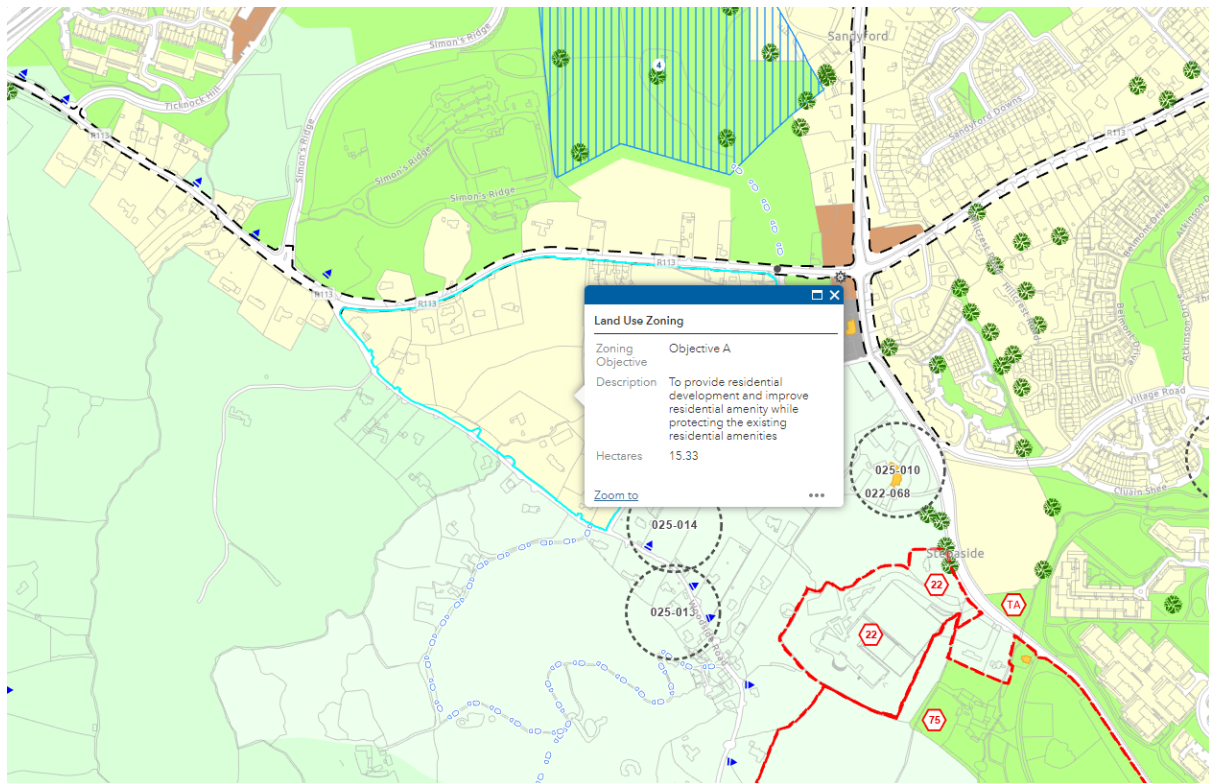
Figure 5 outlines the Permitted in Principle uses for zoning objective 'A'.

ZONING OBJECTIVE 'A'	
To provide residential development and improve residential amenity while protecting the existing residential amenities.	
Permitted in Principle	
Assisted Living Accommodation, Community Facility ^a , Childcare Service ^a , Doctor/Dentist etc. ^a , Education ^a , Health Centre/ Healthcare Facility ^a , Open Space, Public Services, Residential, Residential Institution, Travellers Accommodation.	
Open For Consideration	
Allotments, Aparthotel, Bring Banks/Bring Centres, Carpark ^b , Caravan/Camping Park-Holiday, Caravan Park-Residential, Cemetery, Cultural Use, Embassy, Enterprise Centre, Funeral Home, Garden Centre/Plant Nursery, Guest House, Home Based Economic Activities, Hotel/Motel, Household Fuel Depot, Industry-Light, Part Off-License, Office Based Industry ^c , Offices less than 200sq.m. ^c , Offices in excess of 200 sq.m. ^d , Service Station, Place of Public Worship, Public House, Residential – Build to Rent, Restaurant, Service Garage, Shop Neighbourhood, Student Accommodation, Sports Facility, Tea Room/Café, Veterinary Surgery.	
a:	Where the use will not have adverse effects on the 'A' zoning objective, 'to provide residential development and improve and improve residential amenity while protecting existing residential amenities'.
b:	Only as an ancillary component of and directly connected to the primary use and/or ancillary to public transport and/or active travel modes.
c:	less than 200sq.m.
d:	Only applies to A zoned lands subject to Specific Local Objective 122.

Figure 5 Development Plan Zoning Objectives for Zone A (Dun Laoghaire and Rathdown Development Plan 2022-2028)

The Proposed Development is compatible with the zoning objective for this area as Residential use/Childcare Service is Permitted in Principle under zoning objective 'A'.

Figure 6 indicates the location of the Proposed Development on the zoning map as part of the Dun Laoghaire and Rathdown County Development Plan 2022-2028.



*Figure 6 Zoning Map Dún Laoghaire-Rathdown County Development Plan 2022-2028
(Proposed Development site is located within land outlined in blue)*

A Material Contravention Statement (Brock McClure, August 2022) has also been prepared for the Proposed Development in order to set out the basis for consideration of a material contravention of the Dún Laoghaire Rathdown County Development Plan 2022-2028 in relation to the following matters: Building Height, Residential Mix, Residential Density and Transitional Zone. The Statement concludes:

"In the context of increased height, the most relevant of these requirements is SPPR (specific planning policy requirements) 3A of the Building Height Guidelines. It is submitted that the Development Management criteria under Section 3.2 of the Guidelines have been satisfied in this regard by the development as proposed and that, accordingly, the Board can grant permission for the proposed development even if it considers that it would be a material contravention of building height policy and standards under the Development Plan, having regard to the terms of the relevant national policy discussed above and SPPR 3A of the Building Height Guidelines, in particular.

In the context of residential mix, SPPR 1 of the 2020 Apartment Guidelines applies and the proposal is considered to comply with this Specific Policy requirement. We note specifically that no more than 50% of the proposed units are one-bedroom or studio type units.

In relation to residential density, the proposal clearly supports the key policies of the National Planning Framework to deliver appropriate residential densities and brownfield and infill sites

In relation to transitional zones, the current proposal is considered to deliver a project of national importance given that it clearly delivers on the key policies of the National Planning Framework in terms of expediting residential development. It is also submitted that the

proposal can be positively considered on the basis that these principles have been previously approved by a former planning permission for the site.

As set out in detail in this report there is sufficient justification for An Bord Pleanála to grant permission for the proposed development, notwithstanding any material contravention of the Dun Laoghaire-Rathdown County Development Plan 2022-2028.”

3.6.4 Use of Natural Resources

The main use of resources will be the construction materials used during the construction of the Proposed Development. While the exact quantities of material required have yet to be confirmed, the quantity of materials that will be imported to the site for the Construction Phase of this development will not cause concern in relation to significant effects on the environment. There will also be an increase in the use of energy (fuel for construction vehicles, electricity for tools etc.).

The Construction or Operational Phase of the Proposed Development will not use such a quantity of water to cause concern in relation to significant effects on the environment.

According to the Engineering Services Report) (OCSC, 19th July 2022 all proposed potable water design has been carried out in accordance with Irish Water's Code of Practice for Water Infrastructure, IW-CDS-5020-03. A new 200mm-diameter HDPE watermain connection is to be provided from the existing 200mm Ø watermain on the Blackglen Rd. along the northern site boundary once operational. A new Pre-Connection Enquiry Form (IW Ref No. CDS22002623) was submitted 06th April 2022 to Irish Water for a total of 450 no. residential units. Feedback on this enquiry has been received and states that the development is feasible without infrastructure upgrade by Irish Water. A subsequent Statement of Design Acceptance was issued by Irish Water on 14th July 2022. Refer to Appendix G of the Engineering Services Report (OCSC, 19th July 2022) for a copy of this letter.

The biodiversity of the site will also be protected during the Construction and Operational Phases of the Proposed Development. According to the Ecological Impact Assessment Report (Enviroguide Consulting, August 2022) that was carried out as part of this Planning Application Submission, no species of plant listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations, 2011, were recorded at the site of the Proposed Development during site surveys. In addition, the site does not contain any species listed on the Flora (Protection) Order 2015 (FPO). A search of the National Parks and Wildlife Service FPO Bryophyte Map Viewer provided no records of protected species within the vicinity of the site of the Proposed Development, with the nearest records located in the mountains to the south-west.

Therefore, it is not foreseen that any extensive use of natural resources (land, soil, water and biodiversity) is required for the Construction or Operational Phase of the Proposed Development.

3.6.5 Production of Waste

There will be an increase in waste generation in the form of construction waste produced during the Construction Phase of the Strategic Housing Development. Further details are provided in the CDWMP (OCSC, 19th July 2022). There are no structures to be demolished, therefore no demolition waste will be generated.

The predicted construction waste generation volume is calculated and outlined in the CDWMP. It is estimated that c. 19,868 tonnes of construction waste will be produced during the Construction phase of the Proposed Development. It is predicted soil and stone waste will comprise the bulk of this construction waste, at 19,808 tonnes soil and stone waste. The bulk of waste material generated from the Proposed Development will be from the excavation of the subsoil to accommodate the construction of the under-croft and foundation structures. The CDWMP outlines that soil generated as part of the construction works will be managed in accordance with a Soil Waste Management Plan, to be produced by an environmental management company based on the site investigation results in advance of the construction stage

All movement of waste and the use of waste contractors will be undertaken in accordance with the Waste Management Acts 1996 - 2011, Waste Management (Collection Permit) Regulations 2007 as amended and Waste Management (Facility Permit & Registration) Regulations 2007 and amended. This includes the requirement for all waste contractors to have a waste collection permit issued by the NWCPO. If the waste is being transported to another site, a copy of the Local Authority waste COR/permit or EPA Waste/IE Licence for that site will be provided to the nominated project waste manager (CDWMP, OCSC, 19th July 2022). Therefore, it is not predicted that the production of waste will cause any likely significant effects on the environment.

There will be an increase in waste generation in the form of municipal waste produced during the Operational Phase of the Proposed Development. All waste will be collected by appropriately authorised waste collection contractors and will be managed using suitably licensed waste disposal or materials recovery facilities. An Operational Waste Management Plan (OWMP) (Enviroguide Consulting, July 2022) prepared for the Proposed Development, will ensure that a high level of recycling, reuse and recovery will be achieved at the Proposed Development in line with European targets. Recyclables and organic waste will be segregated at source to reduce the quantity of residual waste materials requiring off-site recovery or disposal. The source segregation of waste types as detailed in this report will help to achieve the targets set out in the *EMR Waste Management Plan 2015 – 2021*. The design of the waste storage area will meet the requirements as detailed in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities.

Estimated waste generation of the main waste types generated by the Operational Phase of the Proposed Development is also outlined within the OWMP. Wastes will be segregated into the separate 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.

Due to the scale of the Proposed Development, in combination with the use of the authorised waste collection/waste treatment facilities, it is not predicted that the production of waste will cause any likely significant effects on the environment.

3.6.6 Pollution and Nuisances

The construction of the Strategic Housing Development could give rise to short-lived nuisances (noise or dust). However, it is not predicted that these impacts will be significant, as they will only be temporary and short-term in duration for the Construction Phase, and

adequate noise and dust mitigation measures will be put in place for the duration of the Construction Phase of the Proposed Development.

A Noise Impact Assessment was carried out by Enfonic Ltd (19th July 2022). The findings of the Assessment demonstrate that:

a)The development shall not be exposed to levels in excess of target values for undesirable high sound levels as set out in the Dublin Agglomeration Noise Action Plan.

b)The temporary noise and vibration impact on the local residents during the construction phase will be mitigated to ensure that it falls within appropriate criteria.

c)The design of the associated mechanical and electrical plant will ensure no adverse impact at the local residences once the scheme is operational.

d)There is no adverse impact as a result of the traffic associated with the scheme.

e)A Good Acoustic Design methodology has been applied to ensure that the internal noise criteria set out in BS8233:2014 will be satisfied with appropriate glazing specification.

The Noise Impact Assessment also recommends that a Contractor should compile a Noise and Vibration Management Plan (NVMP) which will deal specifically with management processes and strategic mitigation measures to remove or reduce significant noise and vibration impacts, and cumulative noise and vibration impacts from the construction works. The Plan will also define noise and vibration monitoring and reporting. The NVMP will also include method statements for each phase of the works, the associated specific measures to minimise noise and vibration in so far as is reasonably practicable for the specific works covered by each plan and a detailed appraisal of the resultant construction noise and vibration generated.

The contractor will provide proactive community relations and will notify the public and vibration sensitive premises before the commencement of any works forecast to generate appreciable levels of noise or vibration, explaining the nature and duration of the works.

The contractor will distribute information circulars informing people of the progress of works and any likely periods of significant noise and vibration.

With regard to potential mitigation measures during construction activities, the standard planning condition typically issued by BS5228 includes guidance on several aspects of construction site mitigation measures, including, but not limited to:

- selection of quiet plant;
- control of noise sources;
- screening;
- hours of work;
- liaison with the public, and
- monitoring.

Noise control measures that will be considered include the selection of quiet plant, enclosures, and screens around noise sources, limiting the hours of work and carrying out noise/vibration monitoring as required.

A suitable site hoarding would protect the residents immediately adjacent to the construction site.

According to the Construction and Environmental Management Plan (CEMP) (OCSC, 19th July 2022), dust mitigation measures include:

- Site roads will be regularly cleaned and maintained as appropriate;
- Hard surface roads will be swept to remove mud and aggregate materials from their surface as a result of the development works;
- Any un-surfaced roads will be restricted to essential site traffic only;
- Any road that has the potential to give rise to fugitive dust will be regularly watered, as appropriate, during extended dry and/or windy conditions;
- On-site speed limits will be stipulated to prevent unnecessary generation of fugitive dust emissions;
- Material handling systems and site stockpiling of materials will be designed and laid out to minimise exposure to wind;
- A complaints register will be maintained on-site and any complaints relating to dust emissions will be immediately dealt with;
- In periods of dry weather when dust emissions would be greatest, a road sweeper, which would also dampen the road, will be employed in order to prevent the generation of dust;
- Water misting or sprays will be used as required if particularly dusty activities are necessary during dry or windy periods; and
- If appropriate, dust monitoring will be carried out during the construction phase of the scheme. If the level of dust is found to exceed 350mg/m²day in the vicinity of the site, further mitigation measures will be incorporated into the construction of the proposed scheme.

Further detail on the proposed construction methodology is presented in the CEMP (OCSC, 19th July 2022) to ensure the site and surrounding area will be clean and tidy at all times, ensuring that the management of construction waste at the site is undertaken in accordance with the current legal and industry standards.

During construction works, some of the plant will have hydraulic components which have the potential to contaminate ground and water if a spill or a leak occurred. However, there will be adequate spill kits available on-site to deal with any potential leak from the hydraulics or other potential sources associated with the development. Best practice will be implemented at all times in relation to all construction activities to avoid any accidental pollution events occurring to the nearby water courses or polluting the ground water table.

The foul water management design for the Proposed Development has been carried out in accordance with Irish Water's Code of Practice for Wastewater Infrastructure.

There is an existing foul water sewer on Blackglen Road, north of the Proposed Development. This sewer is to be upgraded as part of the planned upgrade works on Blackglen Road. Foul water arising from the Proposed Development will be discharged by gravity to the foul sewer

on Blackglen Road. As suggested in the Confirmation of Feasibility Letter received from Irish Water, it is proposed to provide a temporary Wastewater Pumping System (WWPS) within the confines of the site of Proposed Development. This temporary WWPS will limit development flows to a maximum of 5 l/s, until such a stage that the planned upgrade works to the local infrastructure have been completed. On completion of the upgrade works, the connection to the temporary WWPS will be bypassed, to allow for it to be decommissioned and removed, with a gravity connection to the public network facilitated.

According to the Greater Dublin Strategic Drainage Study (GDSDS), the Proposed Development is within the West Pier West Sewer Catchment, as such foul water from the Proposed Development will ultimately be treated at Ringsend Wastewater Treatment Plant (WwTP) (GDSDS, 2005) (Appropriate Assessment Screening Report, Enviroguide Consulting, August 2022).

The Proposed Development is not expected to give rise to nuisance odours.

In terms of traffic as a result of the Proposed Development, a Traffic Impact Assessment has been carried out by OCSC (19th July 2022) and has concluded that while it has been demonstrated that the Proposed Development has little impact on the operation of the local network, it is nevertheless recommended that the local area should be monitored in terms of transportation efficiencies into the future. It also states:

“Of slight concern is Junction 4’s queue lengths, though these are noted to not be caused by the Proposed Development. Given the relatively significant period in question, the conservative nature of the assessment and the considerable uncertainty with how traffic flows will change across such a period, it is not considered appropriate to put in place mitigation measures at present. Rather, it is recommended that this junction should be monitored.”

Implementing the CEMP and CDWMP will ensure that all applicable environmental, health and safety regulations are complied with throughout the Construction Phase thereby ensuring that the Proposed Development will not result in significant effects on human health or the environment resulting from potential pollution or nuisance. It is therefore concluded that the Proposed Development will not give rise to pollution or nuisances, and proper site management will further reduce the likelihood of such impacts occurring.

The above concludes that the Construction and Operational Phases of the Proposed Development will not give rise to pollution or nuisances.

3.6.7 Risk of Major Accidents and/or Disasters

During construction and operations, it is anticipated that the risk of accidents and/or disasters will be insignificant due to adherence to emergency type-specific corrective action measures for potential spillages or fire.

There are no industrial processes (including SEVESO II Directive sites (96/82/EC & 2003/105/EC) in the vicinity of the site of the Proposed Development which would be likely to result in a major accident or disaster relating to dangerous substances.

The potential for the Construction or Operational Phase of the Proposed Development to result in any major accidents and /or disasters can be considered low. This is based on the correct implementation of all standard health and safety procedures, and the lack of substances that

will be used in the Proposed Development which may cause concern for having likely significant effects on the environment.

3.6.8 Risk to Human Health

During the operations of this development, due to best management practices and good housekeeping, it is not foreseen that there will be any negative impacts to human health.

According to the CDWMP and CEMP (OCSC, 19th July 2022) for the Proposed Development, safety, health and environmental issues are a primary consideration in the construction methods adopted. Health, safety and environmental considerations have been addressed within the reports and a range of measures have been outlined to further reduce the likelihood of any adverse impacts on human health.

The COVID-19 pandemic has affected Ireland's economy and society since the first case of the virus was confirmed in Ireland at the end of February 2020. On 11th March 2020, the World Health Organisation (WHO) declared COVID-19 to be a global pandemic.

Ireland's society continues to adhere to the public health advice. All public health advice in place, at the time of commencement of the Construction and Operational Phases of this Proposed Development, will be adhered to in order to protect human and public health.

3.7 Location of the Project

3.7.1 Existing and Approved Land Use

The Proposed Development is bounded by residential properties to the east & west, Blackglen Road to the north, and Woodside Road to the south. The M50 is located 0.7km north from the site. The site's receiving environment – the Blackglen Road corridor west of Lamb's Cross and the triangle of land between Blackglen Road and Woodside Road – is peri-urban in character. The existing site is currently a greenfield site.

In the context of the Development Plan, the Proposed Development is entirely appropriate for the existing land use zoning applicable for the subject lands. The Planning Report and Statement of Consistency (Brock McClure, August 2022) discusses this topic in further detail. The density requirement set out by the current County Development Plan and national guidance have been complied with when designing the scheme. The site layout maximises permeability through appropriate block sizes, block heights, and connectivity. Careful consideration has been given to adjoining levels of residential amenity.

The Material Contravention Statement (Brock McClure, August 2022) states:

"As a general rule the minimum default density for new residential developments in the County (excluding lands on zoning Objectives 'GB', 'G' and 'B') shall be 35 units per hectare (net density¹). The plan states that this density may not be appropriate in all instances but should be applied particularly in relation to 'greenfield' sites or larger 'A' zoned areas. Higher density schemes should offer an exemplary quality of life for existing and future residents in terms of design and amenity.

A density of 97.3 units per ha is proposed at a rate of 360 units on a site area of approx. 3.7 ha. This is considered appropriate and achievable at this location given the quality of the

scheme proposed, the proximity to public transport, and the protection of existing levels of residential amenity for sites surrounding.

The open character and residential amenity of the site is also retained through a high quality, open landscape design that reflects the existing character whilst ensuring that a higher density is delivered. The open character and recreational amenity of the site has been integral to the design of the proposal. The landscape plan provides for quality landscaping, leaving open areas of the site, and reflects its existing character.

Notwithstanding this, it is submitted that the proposed development gives rise to a Material Contravention of the Development Plan in respect of residential density. In this case, it is our view that the proposal is of national importance and the current proposals for density are fundamentally supported by the National Planning Framework and more specifically National Policy Objective 35. On this basis, permission can be granted for the proposal."

It is considered that the Proposed Development will have no significant impact on the wider landscape as it will be keeping in line with the surrounding land uses and the permitted zoning of the area.

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

Having regard to the character of the receiving environment and the surrounding area, the impacts are considered to be negligible for the Proposed Development in relation to the regenerative capacity of natural resources in the area. All material required for the Construction Phase of the development will be imported. While the exact quantities of material required for the construction of the Proposed Development have yet to be confirmed, the quantity of materials that will be imported to the site for the Construction Phase of this development will not result in significant effects on the environment.

As detailed within the CDWMP (OCSC, 19th July 2022), materials will be re-used where possible, and extraction of materials will be carefully undertaken to ensure that the highest proportion of the materials can be re-used. This will reduce the level of new materials required for the site. This in turn reduces the impact on new resources and carbon emissions associated with the extraction, manufacture and transportation of materials to the site.

3.7.3 The Absorption Capacity of the Natural Environment

3.7.3.1 Overview

The site of the Proposed Development is within the Ovoca-Vartry Water Framework Directive (WFD) Catchment, the Dargle_SC_010 WFD sub catchment, the Carrickmines_010 River Subbasin (IE_EA_10C040350) and the Ovoca-Vartry Hydrometric Area (EPA,2021). The site of the Proposed Development is situated on Wicklow groundwater body, which has a WFD status of *Good* and the risk of not meeting its WFD objectives is currently *Under Review*. The groundwater vulnerability to contamination via human activities is classed as *Extreme – Rock at or Near Surface*. The site is on a Poor aquifer, namely PI, *Bedrock which is Generally Unproductive except for Local Zones*. The groundwater rock units underlying the aquifer are classified as *Granites and other Igneous Intrusive Rocks*. (GSI,2022). The subsoil beneath the site is classified as bedrock outcrop or subcrop (EPA, 2022).

The site has a high absorption capacity to facilitate the scale and nature of the Proposed Development and there is no likelihood of significant environmental effects.

3.7.3.2 Watercourses

The Carrickmines stream (EPA Code: 10C04) flows along the southern boundary of the site, flowing through Brides Glen, Loughlinstown and discharging to the Irish Sea at Shanganagh, 10.7 river km downstream of the site. The Carrickmines stream has a WFD status of *Moderate* and the waterbody is *At Risk* of not meeting its WFD objectives. Water quality in the Carrickmines stream is monitored downstream of the site between Glenamuck Road and Loughlinstown, water quality was *Moderate* (Q3-4) at all stations monitored in 2018 (EPA, 2022). The status of the Irish Sea at Killiney Bay is *High* and the coastal waterbody is *Not At Risk* of not meeting its WFD status objectives. The Slang River (EPA Code:09S04) flows 0.4 km west of the site in a northern direction. The waterbody has a WFD status of *Moderate* and is *At Risk* of not meeting its WFD objectives (EPA, 2022). The Slang River is a tributary of the River Dodder (EPA Code:09D01) and flows into the Liffey Estuary Lower 10.2 river km north of the site. The status of the Liffey Estuary Lower is currently *Good* and the transitional waterbodies risk is currently *Under Review* (EPA, 2022).

A detailed Site-Specific Flood Risk Assessment (SSFRA) (OCSC, 19th July 2022) has been carried out as part of this planning application. The SSFRA concluded that, in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities, there is no significant risk for flood in the Proposed Development.

Sustainable Urban Drainage Systems (SuDS) techniques, as detailed in the Engineering Services Report (OCSC, 19th July 2022), as well as traditional surface water drainage techniques will be used to manage surface water runoff from the development. SuDS features proposed for the development including permeable paving, green roofs, filter drains and bioretention areas, and are detailed further in the Engineering Services Report (OCSC, 19th July 2022).

In addition, the proposed buildings on site are significantly set back from the southern boundary of the site, and excavation works along the southeast boundary are not required. The current vegetated natural buffer of 10 meters along the southern boundary of the site will prevent any entrained sediment in surface water runoff from entering the Carrickmines stream during the Construction Phase (Appropriate Assessment Screening Report, Enviroguide Consulting, August 2022)

Therefore, it is not anticipated that there will be adverse impacts in any watercourses in the vicinity of the Proposed Development due to adherence to appropriate control measures.

3.7.3.3 Mountain and Forest Areas

The subject site is located at the foothills of the Dublin Mountains to the west of Lambs Cross, Sandyford Co. Dublin. The site is located in a transitional zone between the built-up urban areas and the high amenity lands at the foothills of the Dublin Mountains.

However, due to the presence of existing residential developments, as well as the implementation of key measures outlined in the Architectural Design Statement (O'Mahony Pike, August 2022), it is not predicted the Construction or Operational Phases of the Proposed Development will have any impact on mountains and forest areas. Likewise, the

upgraded Blackglen Road will be of urban character (as a streetscape) and capacity, facilitating pedestrian and cycle movement and the use of public transport, and it will tie the adjacent lands – including the site - into the urban area (Landscape and Visual Impact Assessment, Model Works Ltd, August 2022).

3.7.3.4 Nature Reserves and Parks

No NHAs are located within, or directly adjacent to, the Site of the Proposed Development. The nearest pNHA to the Proposed Development is the Fitzsimon's Woods pNHA located ca.110m to the north. The Proposed Development maintains no significant impact pathway with this pNHA, hydrological or otherwise, however, increased recreational use of the Fitzsimon's Woods pNHA is likely to occur as a result of the increase in population in the area as a result of the Proposed Development.

It is noted that there are existing established walking trails throughout the pNHA woodland and as such, no significant soil erosion or increased disturbance to flora and fauna is anticipated from any increased footfall at the pNHA. Badgers are known to be resident in the woodland with several setts recorded within or adjacent to the pNHA (D'Arcy, 2021). Badger are nocturnal species and thus unlikely to be significantly impacted by any increased footfall at this pNHA.

An area adjacent and south of the pNHA, known as Gorse Hill, contains four ponds (D'Arcy, 2021), of which Smooth newt are known to breed in at least one of them (Tubridy, 2006). These ponds are located outside of the pNHA and largely off the walking trails and would not be susceptible to significant disturbance relating to increase usage of the woods by residents of the Proposed Development.

In addition, the Proposed Development entails the creation and provision of an extensive internal woodland walk and associated amenities for future residents, which will lessen somewhat the extent of the usage of Fitzsimon's Woods pNHA (Ecological Impact Assessment Report, Enviroguide Consulting, August 2022).

3.7.3.5 Nationally Designated Sites

Within a 15km radius of the site, there is a total of nine SACs and four SPAs. These are detailed in Table 3. An Appropriate Assessment (AA) Screening Report (Enviroguide Consulting, August 2022) was produced as part of the planning application. In carrying out this AA screening, **mitigation measures have not been taken into account**. Standard best practice construction measures which could have the effect of mitigating any effects on any European Sites have similarly not been taken into account.

The AA Screening Report concluded, on the basis of the best scientific knowledge available, that the possibility of any significant effects on any European Sites, whether arising from the Proposed Development itself or in combination with other plans and projects, **can be excluded**. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of a Natura Impact Statement (NIS) is not required.

Table 3 Natura 2000 sites within 15km of Proposed Development

Site Name & Code	Qualifying Interests (* = priority habitats)	Distance to Site	Connections (Source- Pathway- Receptor)
Special Areas of Conservation (SAC)			
Wicklow Mountains SAC (002122)	[3110] Oligotrophic Waters containing very few minerals [3130] Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletea uniflorae</i> and/or <i>Isoeto-Nanojuncetea</i> [3160] Dystrophic Lakes [4010] Wet Heath [4030] Dry Heath [4060] Alpine and Subalpine Heaths [6130] Calaminarian Grassland [6230] Species-rich <i>Nardus</i> Grassland* [7130] Blanket Bogs (Active)* [8110] Siliceous Scree [8210] Calcareous Rocky Slopes [8220] Siliceous Rocky Slopes [91A0] Old Oak Woodlands [1355] Otter (<i>Lutra lutra</i>)	4.2 km	None – There are no impact pathways present linking the Proposed Development and the habitats and species listed for the Wicklow Mountains SAC. This SAC is located 4.2 km south-west of the Proposed Development.
South Dublin Bay SAC (000210)	[1140] Tidal Mudflats and Sandflats [1210] Annual vegetation of drift lines [1310] Salicornia and other annuals colonising mud and sand [2110] Embryonic shifting dunes	5.6 km	None – There are no impact pathways present linking the Proposed Development and the habitats and species listed for this SAC. This SAC is located 5.6 km from the Proposed Development and is separated by a significant marine buffer. No significant hydrological connectivity exists. ¹
Knocksink Wood SAC (000725)	[7220] Petrifying Springs* [91A0] Old Oak Woodlands [91E0] Alluvial Forests*	5.9 km	None – There are no impact pathways present linking the Proposed Development and the habitats and species listed for this SAC. This SAC is located 5.6 km from the Proposed Development in the mountains to the South of the Site.
Ballyman Glen SAC (000713)	[7220] Petrifying Springs* [7230] Alkaline Fens	7.7 km	None – There are no impact pathways present linking the

¹ The main area of dispersal of the treated effluent from Ringsend WwTP is in the Tolka Basin and around North Bull Island. South Dublin Bay is unaffected by the effluent from the plant (Irish Water, 2018).

Site Name & Site Code	Qualifying Interests (*= priority habitats)	Distance to Site	Connections (Source- Pathway- Receptor)
Glenasmole Valley SAC (001209)	[6210] Orchid-rich Calcareous Grassland* [6410] <i>Molinia</i> Meadows [7220] Petrifying Springs*	8.1 km	Proposed Development and the habitats and species listed for these SACs. These SACs are located in the Dublin and Wicklow mountains to the south of the Site.
Rockabill to Dalkey Island SAC (003000)	[1170] Reefs [1351] Harbour Porpoise (<i>Phocoena phocoena</i>)	9.7 km	Yes – a potential connection via surface water and wastewater ² flows from the Proposed Development.
North Dublin Bay SAC (000206)	[1140] Tidal Mudflats and Sandflats [1210] Annual Vegetation of Drift Lines [1310] Salicornia Mud [1330] Atlantic Salt Meadows [1410] Mediterranean Salt Meadows [2110] Embryonic Shifting Dunes [2120] Marram Dunes (White Dunes) [2130] Fixed Dunes (Grey Dunes) * [2190] Humid Dune Slacks [1395] Petalwort (<i>Petalophyllum ralfsii</i>)	10.5 km	
Bray Head SAC (000714)	[1230] Vegetated Sea Cliffs [4030] Dry Heath	12.3 km	None – There are no impact pathways present linking the Proposed Development and the habitats and species listed for these SACs. These SACs are located at considerable distances from the Proposed Development and are separated by a significant marine buffer. No significant hydrological connectivity exists.
Howth Head SAC (000202)	[1230] Vegetated Sea Cliffs [4030] Dry Heath	14.7 km	
Special Protection Areas (SPA)			
Wicklow Mountains SPA (004040)	[A098] Merlin (<i>Falco columbarius</i>) [A103] Peregrine (<i>Falco peregrinus</i>)	4.3 km	None – There are no impact pathways present linking the Proposed Development and the populations of bird species listed for this SPA. This SPA is located in the mountains situated a considerable distance to the south-west of the Proposed Development. The Site provides no <i>ex-situ</i> habitat for Peregrine or Merlin.

² The main area of dispersal of the treated effluent from Ringsend WwTP is in the Tolka Basin and around North Bull Island. South Dublin Bay is unaffected by the effluent from the plant (Irish Water, 2018).

Site Name & Code	Qualifying Interests (* = priority habitats)	Distance to Site	Connections (Source- Pathway- Receptor)
South Dublin Bay and River Tolka Estuary SPA (004024)	[A046] Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A130] Oystercatcher (<i>Haematopus ostralegus</i>) [A137] Ringed Plover (<i>Charadrius hiaticula</i>) [A141] Grey Plover (<i>Pluvialis squatarola</i>) [A143] Knot (<i>Calidris canutus</i>) [A144] Sanderling (<i>Calidris alba</i>) [A149] Dunlin (<i>Calidris alpina</i>) [A157] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A162] Redshank (<i>Tringa totanus</i>) [A179] Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A192] Roseate Tern (<i>Sterna dougallii</i>) [A193] Common Tern (<i>Sterna hirundo</i>) [A194] Arctic Tern (<i>Sterna paradisaea</i>) [A999] Wetland and Waterbirds	5.5 km	None – There are no impact pathways present linking the Proposed Development and the populations of bird species listed for this SPA. This SPA is located in Dublin Bay and is situated a considerable distance from the Proposed Development. The hydrological connection via Ringsend WwTP is deemed insignificant. ³
Dalkey Island SPA (004172)	[A192] Roseate Tern (<i>Sterna dougallii</i>) [A193] Common Tern (<i>Sterna hirundo</i>) [A194] Arctic Tern (<i>Sterna paradisaea</i>)	9.4 km	Yes – a potential connection via surface water and wastewater flows from the Proposed Development.
North Bull Island SPA (004006)	[A046] Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A048] Shelduck (<i>Tadorna tadorna</i>) [A052] Teal (<i>Anas crecca</i>) [A054] Pintail (<i>Anas acuta</i>) [A056] Shoveler (<i>Anas clypeata</i>) [A130] Oystercatcher (<i>Haematopus ostralegus</i>) [A140] Golden Plover (<i>Pluvialis apricaria</i>) [A141] Grey Plover (<i>Pluvialis squatarola</i>) [A143] Knot (<i>Calidris canutus</i>) [A144] Sanderling (<i>Calidris alba</i>) [A149] Dunlin (<i>Calidris alpina</i>) [A156] Black-tailed Godwit (<i>Limosa limosa</i>) [A157] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A160] Curlew (<i>Numenius arquata</i>) [A162] Redshank (<i>Tringa totanus</i>) [A169] Turnstone (<i>Arenaria interpres</i>) [A179] Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A999] Wetland and Waterbirds	10.5 km	

3.7.3.6 Environmental Quality Standards

It is not expected that any environmental quality standards will be exceeded by the Construction or Operational Phases of the Proposed Development.

The associated site and infrastructural works include provision for water services; foul and surface water drainage and connections; attenuation proposals; permeable paving; all

³ The main area of dispersal of the treated effluent from Ringsend WwTP is in the Tolka Basin and around North Bull Island. South Dublin Bay is unaffected by the effluent from the plant (Irish Water, 2018).

landscaping works; green roofs; boundary treatment; internal roads and footpaths; electrical services; and all associated site development works.

Sustainable Drainage Systems (SuDS) are to be provided, wherever practicable, and these are discussed in further detail in the Engineering Services Report (OCSC, 19th July 2022), with discharge rates from site being restricted to the greenfield equivalent runoff rate, for design rainfall events up to, and including, the 1% AEP, in accordance with the Dun Laoghaire Rathdown County Council Development Plan and the GDSDS. The proposed surface water drainage strategy and detailed design has been subject to a SuDS Audit, carried out by JBA Consulting. A copy of the SuDS Audit is provided in Appendix F of the Engineering Services Report.

3.7.3.7 Densely Populated Areas

The site is zoned land, and the use is compatible with the existing Development Plan for the area and uses in the vicinity.

The Traffic Impact Assessment (TIA)(OCSC, 19th July 2022) has concluded “...*that local road network is capable of catering for the additional traffic associated with the proposed residential development without significant negative impact and that the local transport network has been shown to experience no notable negative impact as a result of a development of the type planned.*”

It should also be noted that the Blackglan Road Improvement Scheme will improve walking and cycling infrastructure in the immediate vicinity. The TIA has also stated that outside of the study area, development-generated traffic will dissipate considerably and so is expected to have a negligible impact on the operation of the wider network.

The Proposed Development has been designed in accordance with both the principles and guidance outlined within the Design Manual for Urban Roads and Streets (DMURS). High levels of pedestrian movement are catered for which supports vibrant and sustainable places. The segregation and exclusion of vehicular traffic and where appropriate the use of shared streets within the development also supports the sense of place (DMURS Compliance Statement, OCSC, 19th July 2022).

It can therefore be concluded that there will be no likely significant impacts on the environment with regard to the geographic location of densely populated areas.

3.7.3.8 Landscapes and Sites of Historical, Cultural or Archaeological Significance.

The three closest archaeological sites are an Enclosure (DU025-014----), a well (DU025-013---) and a House - 16th/17th century (DU022-068----) which are located 0.2km, 0.3km and 0.5km (respectively) from the site.

An Architectural Heritage Impact Assessment (Historic Building Consultants, 11th July 2022) has been completed for the Proposed Development and will be submitted as part of this application. The assessment addressed the potential for the Proposed Development to have an impact on a ruined building that is outside the application site, but adjacent to the boundary, and which is believed to have been occupied by Constance Markievicz in the time leading up to the Easter Rising of 1916. The report concluded that the ruined cottages adjacent to the

application site are not protected structures and have not been included in the survey carried out by the National Inventory of Architectural Heritage. The site is not in an architectural conservation area and not adjacent to or close to an architectural conservation area. The site and the surrounding area are zoned residential. Given that the application site and the area in general have been zoned for residential purposes it is accepted that development will occur. The layout proposed will ensure that development is kept away from the immediate vicinity of the two cottages and the proposal to retain a belt of landscaping along the boundary of the site near the cottages and to locate the nearest building at a reasonable distance will ensure that the effect on the character and setting of the cottages will be minimised. The buildings are ruinous, and the adjacent Proposed Development would have no appreciable impact on their settings or any remaining historical qualities.

The Architectural Design Statement (O' Mahony Pike, August 2022) details the Proposed Development layout and the considered approach of the development design in order to sensitively integrate the Proposed Development into and around the natural rolling hillside landscape. As discussed in the Planning Report (Brock McClure, August 2022), there are 4 distinct character areas of the Proposed Development that have been designed to blend into the current existing landscape with the purpose of creating a unique environment and sense of place combined with high quality architecture.

It is foreseen that there will be negligible impact on landscapes and sites of historical, cultural or archaeological significance.

3.7.3.9 Designated Focal Points/ Views

There are no protected views, rights of way or planned pieces of strategic infrastructure or any important tourist sites affected in any way by the Proposed Development. The site is currently greenfield in nature and all proposals are in line with planning and policy objectives for the area.

A Landscape and Visual Impact Assessment was carried out by Model Works Ltd (August 2022) for the Proposed Development to investigate the potential townscape and visual impacts. This assessment was carried out in response to the pre-planning consultation and the An Bord Pleanála Opinion. Following the pre-consultation meeting, the Proposed Development design has been modified across the site with a view to reducing the development's landscape and visual impacts.

One of the most significant modifications to the proposal in response to the ABP Opinion was the reduction in height of Blocks B3 by one storey and B4 by two storeys. This was done to reduce the overall density of built form in this area. Another significant change was the omission of the previously proposed Block D, which had been conceived as a tall (eight storey) 'marker' to identify the site/development in the landscape and thereby improve legibility in the area. This was considered unnecessary and a contributing factor to the proposal's excessive density. Its removal has reduced the overall height on the site and increased the area of open space. The assessment concluded the following:

"The assessment has found that while the proposal would have a significant visual effect on a small number of surrounding properties (e.g. on the neighbouring property represented by Viewpoint 5), the proposal is sufficiently responsive to the sensitivity, and of sufficiently high

design quality, to avoid a long term negative impact on visual amenity. The development would be visible, but the visual and other residential amenities of the neighbouring properties would remain of a high standard. In conclusion, no significant negative landscape or visual impacts are predicted.”

Further details are available in the Landscape and Visual Impact Assessment (Model Works Ltd, August 2022) that is being submitted as part of this planning application.

A Daylight/Sunlight Report (OCSC, June 2022) was carried out for the application. A development could potentially have a negative effect on the level of daylight or sunlight that properties adjacent to the site receives, in the event that the Proposed Development is large in relation to their distance from the existing dwelling. The report states that:

“The analysis also shows that the proposed building has imperceptible daylight and sunlight to windows impact to neighbouring properties.

The overshadowing images have demonstrated that the only impact to adjacent properties will be to those located to the East of the proposed development. A minimal impact will be perceived on March 21st after 3 PM.”

On the assessment of the above, it is demonstrated that there will be negligible impact on the designated focal points or views.

3.8 Characteristics of the Potential Impacts

3.8.1 Extent of the Impact

The Proposed Development use is consistent with land use in this location. The immediate area of the Proposed Development may experience a minor impact during the Construction Phase in terms of pollution and nuisance, however the works are not of such a scale or extent that would be considered likely to cause significant effect on the environment or on the population size in the vicinity.

The Operational Phase of the development will result in an increase in population in the area; however, due to the nature and scale of the proposed activities for this development, there are no significant impacts envisaged on the geographical area and size of the affected population in the area. The Operational Phase will result in an increase in the population of the area, and it will have a positive impact on the long-term supply needs of housing in the Sandyford area.

3.8.2 Transboundary Nature of the Impact

The effects of the Proposed Development are local in nature and there are no transboundary impacts associated with the Proposed Development. The geographical extent and population likely to be affected is limited and significant environmental effects are unlikely to arise.

3.8.3 Magnitude and Complexity of the Impact

3.8.3.1 Air Quality and Climate

The Proposed Development involves construction works which may temporarily impact on air quality due to dust emissions. According to the Institute of Air Quality Management (2014), the main air quality impacts associated with construction are:

- Dust deposition and surface soiling;
- Visible dust plumes;
- Elevated PM₁₀ concentrations due to dust generating activities onsite;
- Increase in airborne particles and nitrogen dioxide due to exhaust emissions from diesel powered vehicles and machinery onsite and vehicles accessing the Site.

Construction works will be carried out in such a way as to limit the emissions to air of pollutants and will employ best practices. A Traffic Impact Assessment was also carried out by OCSC (19th July 2022) and states that it has been demonstrated that the Proposed Development has little impact on the operation of the local network, therefore it can be considered that pollutants due to a significant increase in Proposed Development related traffic, will not be significant.

There is the potential for combustion emissions from onsite machinery and traffic derived pollutants of CO₂ and N₂O to be emitted as a result of the proposed construction works. However, in this case, the effect on national GHG emissions will be insignificant in terms of overall national contributions and Ireland's obligations under the Kyoto Protocol and therefore will have no considerable impact on climate.

An Energy & Sustainability Report (OCSC, August 2022) has also been collated for the Proposed Development. This report sets out various energy conservation measures which it is proposed will be incorporated into the Development design in order to aid in the reduction of energy consumption, carbon emissions and cost throughout the building lifecycle, and achieve compliance with Part L of the Building Regulations.

The CEMP (OCSC, 19th July 2022) also details that the main activities that may give rise to dust emissions during construction include the following:

- Materials handling and storage; and
- Movement of vehicles (particularly HGV's) and mobile plant.

The CEMP (OCSC, 19th July 2022), details further dust control mitigation measures to minimise potential effects on air quality from construction.

3.8.3.2 Noise and Vibration

In order to control likely noise impacts caused by the proposed Construction and Operational Phases, standard mitigation measures will be adopted, the mitigation measures, as outlined in the Noise Impact Assessment (Enfonic, July 2022), and CEMP (OCSC, 19th July 2022) are as follows:

- selection of quiet plant;

- control of noise sources;
- screening;
- hours of work;
- liaison with the public; and
- monitoring.

All construction activities will be carried out in compliance with the recommendations of BS 5228, Noise Control on Construction and Open Sites Part 1 and comply with BS 6187 Code of Practice for Demolition.

3.8.3.3 Soils and Geology

There are no protected Geological Heritage Sites in the vicinity of the Proposed Development that will be impacted by the proposed works.

3.8.3.4 Hydrology & Hydrogeology

Best practice will be implemented at all times in relation to all construction activities to avoid any accidental pollution events occurring to the nearby water courses or polluting the ground water table. The Site-Specific Construction and Demolition Waste Management Plan (OCSC, 19th July 2022) outlines a number of control measures which are being proposed as part of the scheme that will prevent any significant risk of pollution to water resources. The Ecological Impact Assessment (Enviroguide Consulting, August 2022) concluded that there are no significant hydrological connections with Natura 2000 sites due to:

- The inclusion of a natural 10m buffer of vegetation from Carrickmines Stream in south of site, in the landscape design.
- No works will take place within this area and existing dense bracken vegetation is being retained.
- The considerable intervening distance between the site and downstream European sites as described in the AA screening.

In accordance with current planning and policy requirements, new developments must ensure that a comprehensive SuDS, is incorporated into the development. SuDS requires that post development run-off rates be maintained at equivalent, or lower, levels than pre-development levels. Any new development must also have the physical capacity to retain surface water volumes as directed under the GDSDS and, if necessary, release these attenuated surface water volumes to an outfall at a controlled flow rate, not greater than the greenfield runoff equivalent. A further component of the SuDS protocol is to increase the overall water quality of surface water runoff before it enters a natural watercourse or a public sewer, which ultimately discharges to a water body. This is to ensure the highest possible standard of surface water quality.

‘The Proposed Development is to be served by a gravity surface water network comprising a single catchment as a result of the natural topography’. Surface water from the Proposed Development will be discharged, once attenuated and treated on site, to the public surface water network on Blackglen Road. Surface water discharge from the site will be *‘restricted to the greenfield equivalent runoff rate of 15.l/s’* as required.

Sustainable Drainage Systems integrated into the surface water management plan include the following:

- Permeable paving will be provided within all car parking spaces within the Proposed Development.
- Green roofs on buildings within the Proposed Development, over 60% of roof area is proposed as green roof.
- All road gullies serving the Proposed Development are to be trapped, which will help prevent sediment and gross pollutants from entering the surface water network.
- A silt trap which will be located upstream of the attenuation system.
- Filter drains to be provided along roads where possible to intercept and treat polluted water.
- Interception storage will be provided below the Proposed Development's primary attenuation. This will temporarily store and treat the first 5mm rainfall on the development. The interception storage is to be allowed to drain naturally, which will reduce the volume of discharging to the existing network while increasing the quality of the water infiltrating to the ground
- A flow control device will be provided immediately downstream of the attenuation system, restricting the surface water discharge from the site.
- A Class 1 bypass fuel separator will be located prior to outfall to the public water network.

Surface water drainage design is carried out in accordance with the recommendations of the GDSDS and the Regional Drainage Policies Volume 2 – New Development (Appropriate Assessment Screening Report, Enviroguide Consulting, August 2022).

A Flood Risk Assessment (OCSC, 19th July 2022) concluded that in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities, there is no significant risk for flooding in the Proposed Development and it is appropriate for use. It states: *"In order to minimise the risk of flooding within the development, it is recommended that all drainage infrastructure is designed and installed in accordance with the relevant standards. The proposed units are located outside the 1 in 1000-year flood extents and above the 1 in 1000-year flood level."*

3.8.3.5 Biodiversity

The areas surrounding the Proposed Development site have been continuously developed with the protection of the surrounding ecological environment in mind.

An Ecological Impact Assessment Report (EclA) has been prepared by Enviroguide Consulting for the site (August 2022). This report provides a description of the biodiversity of the site in question, in terms of the existing habitats and species recorded at the site; with particular focus on those species that are either protected by national and international legislation, considered to be of particular nature conservation importance, or those that are covered by invasive species control legislation. The report details the ecology of the site lands, with emphasis on habitats, flora and fauna; based on the findings of an ecological survey conducted at the site in September 2021. The surveys undertaken are noted as follows:

- Habitat & Invasive Flora
- Bats
- Breeding Birds

- Mammal Surveys
- Other Fauna

The EclA report concludes that provided the mitigation and enhancement measures proposed are implemented in full, there will be no significant negative impact to any valued habitats, designated sites or individual or group of species as a result of the Proposed Development. Furthermore, it is deemed that the Proposed Development will have an overall positive impact on the ecology of the site; through the increased provision and enhancement of habitats onsite e.g., increased native woodland and tree cover; and more species-specific habitat creation such as wildlife ponds. At the request of DLRCC, as outlined in the Biodiversity Report (dated 30th November 2021) submitted as part of the council's opinion on the pre-application submission, a schedule of ecological monitoring for the Proposed Development, is proposed. This includes pre-construction bat survey of the derelict buildings, mammal surveys, pre-clearance vegetation surveys and amphibian surveys.

A Tree Report and Survey was also carried out by Enviroguide Consulting (June 2022). Offsite trees and shrubs were assessed during a site visit on the 14th of March 2021. Full details of the individual trees assessed on the site are listed in the Tree Survey Schedule in the appendices of the Tree Report. Preliminary management recommendations for the trees assessed are listed in the tree survey schedule in the appendices; these pertain to current site conditions unless otherwise stated. As the vegetation is site boundary vegetation it is recommended that consultation with adjoining landowners is carried out and any proposed works to boundary vegetation are agreed. All tree work should be carried out by qualified and experienced tree surgeons; all tree work should be in accordance with *BS3998 (2010) Tree Work – Recommendations*.

The Ecological Impact Assessment Report (Enviroguide Consulting, August 2022) also states that a significant increase in native tree cover is proposed at the Site. The landscape plan entails retention of the majority of treelines and boundary habitats at the Site, along with a native woodland margin proposed for the boundary of the Site.

It is therefore concluded that the Proposed Development will result in an overall positive impact through the increase in native tree cover at the Site. This general increase in the quality and provision of habitats at the Site of the Proposed Development represents a considerable positive, permanent impact overall.

There is also the opportunity for further biodiversity enhancement through the extensive planting of pollinator friendly flower and shrub species where possible; that will benefit bees and suburban pollinator species, along with birds and local bats through an increased availability of prey.

There is also the opportunity for further biodiversity enhancement through the extensive planting of pollinator friendly flower and shrub species where possible; that will benefit bees and suburban pollinator species, along with birds and local bats through an increased availability of prey.

Therefore, it is considered there will be no significant, negative impacts to any valued habitats or individual or group of species as a result of the Proposed Development.

3.8.3.6 Archaeology, Architecture and Cultural Heritage

There are no protected sites listed in the Record of Protected Structures (RPS) or National Inventory of Architectural Heritage (NIAH) within the site or the nearby vicinity of the Proposed Development.

Construction works within its boundary will, therefore, have no predicted adverse impact on any known archaeological resource. The development of the subject lands will, therefore, have no predicted adverse impact on the architectural heritage resource.

An Architectural Heritage Impact Assessment (Historic Building Consultants, 11th July 2022) has also been completed and will be submitted as part of this application. The report addresses the potential for the Proposed Development to have an impact on of a ruined building that is outside the application site, but adjacent to the boundary. The report concluded that the layout proposed will ensure that development is kept away from the immediate vicinity of the two cottages and the proposal to retain a belt of landscaping along the boundary of the site near the cottages and to locate the nearest building at a reasonable distance will ensure that the effect on the character and setting of the cottages will be minimised.

An Archaeological Assessment (IAC Archaeology, July 2022) has also been prepared for the Proposed Development application, and concluded the following:

“A stream that forms the townland boundary between Balally and Barnacullia runs along the south-eastern boundary of the proposed development area. There are three recorded monuments within 500m of the site, the closest of which is an enclosure (DU025-014), c. 220m to the southeast. A review of the Excavations Bulletin (1970–2020) has shown that no previous archaeological fieldwork has been carried out within the proposed development area. Two archaeological investigations have taken place in the vicinity. Only one of these revealed anything of archaeological significance: a number of small pits of potential archaeological interest and a faint linear feature identified during archaeological testing in advance of development at Woodside Road, c. 130m south of the proposed development area. Examination of historic mapping and aerial photography depicting the area proposed development has shown that it has remained as undeveloped open land throughout the post-medieval period, and has seen little use in recent decades, being heavily overgrown since at least the beginning of the 21st century. A field inspection was carried out as part of this assessment, which confirmed the site is currently under heavy vegetation. No features of archaeological potential were identified during the course of the field inspection. The presence of frequent rock outcropping across the site and the marginal nature of the terrain means that the site is unlikely to have been considered suitable for previous permanent settlement. It remains possible that activities associated with the use of the upland landscape during summer months, during the prehistoric and historic periods, may survive within the site.

Mitigation:

Due to frequent rock out-cropping across the site and the uneven terrain, it will not be possible to carry out an effective programme of archaeological testing in advance of development. Therefore, it is recommended that all ground disturbances be monitored by a suitably qualified

archaeologist. If any features of archaeological potential are discovered during the course of the works further archaeological mitigation may be required, such as preservation in-situ or by record. Any further mitigation will require approval from the National Monuments Service of the DoHLGH (Department of Housing, Local Government and Heritage).

The Proposed Development will have no impact on any monuments, archaeological sites, or structures. There are no buildings to be demolished which are on the register of protected structures.

3.8.3.7 Material Assets and Land

It is considered that the Proposed Development will be in keeping with the surrounding land uses and the zoning of the area. Likewise, the open character and residential amenity of the site will also be retained through a high quality, open landscape design, which reflects the existing character whilst ensuring that a higher density is delivered. The open character and recreational amenity of the site has been integral to the design of the proposal. The landscape plan provides for quality landscaping, leaving open areas of the site, and reflects its existing character (Planning Report, Brock McClure, August 2022).

A Telecommunications Impact Assessment has been prepared by Independent Site Management Limited (15th July 2022) in order to assess if the Proposed Development has the potential to impact any Telecommunication Channels. This assessment concluded that the Proposed Development will not impact any telecommunication channels, and as a result of these findings, the authors have not made any recommendations that the Applicant implement any mitigation infrastructure at this time.

A Site Utility Report has also been prepared by OCSC (August 2022), which details the proposed ESNB electrical supply, as follows:

“It is proposed to provide 4 No. ESNB substations to supply the development. 3 no. sub-stations shall be integrated within the building structures of Blocks B and Blocks C. Of these 2 no. Sub-stations shall serve Block C1, C2 & C3, and one Sub-station shall serve Blocks A1, A2, B1 & B2. In addition, one Sub-station shall be classed as a unit sub-station mounted externally on a dedicated plinth serving B3/B4.”

For the Operational Phase of the Proposed Development, all waste will be collected by appropriately authorised waste collection contractors and will be disposed of using suitably licensed waste disposal or materials recovery facilities. The Operational Waste Management Plan (OWMP) (Enviroguide Consulting, July 2022) ensures that the management of waste during the Operational Phase of the Proposed Development will be undertaken in accordance with the current legal and industry standards as outlined within the OWMP.

Hence, it is considered that there is sufficient capacity within the individual networks to service the Proposed Development, and there will be no significant adverse impact on the Material Assets of the surrounding area during either the Construction or Operational Phases.

3.8.3.8 Landscape and Visual Amenity

The visual impact of the Proposed Development is a significant consideration and a range of photomontage views have been prepared by Modelworks (August 2022) to demonstrate the

impact of the Proposed Development. These views have been assessed in a comprehensive Landscape & Visual Impact Assessment. The assessment findings conclude that considered at the local scale the magnitude of change to the landscape would be high. Considered at the wider scale, the magnitude of change to the landscape would be low.

“Measuring the magnitude of change against the sensitivity of the receiving environment, the significance of the landscape effects is predicted to be ‘significant’ at the local scale, and ‘slight’ at the wider scale. While the landscape change would be significant locally, this is an intended effect. Given that (a) the existing peri-urban landscape is neither a valued landscape character type nor a sustainable use of the land and services, (b) the affected area is due to undergo a process of urban consolidation facilitated by the DLR Development Plan and the Blackglen Road Improvement Scheme, (c) urban consolidation and densification is encouraged by county and national policy, and (d) the proposed development is responsive to its context and local sensitivities and of high design and material quality, the change can be considered positive.”

3.8.3.9 Population and Human Health

According to the CDWMP (OCSC, 19th July 2022) and the CEMP (OCSC, 19th July 2022) for the site, safety, health and environmental issues are a primary consideration in the construction methods adopted. The construction team will develop detailed health and safety plans, specific environmental, fire and accident procedures to suit the construction sequence of the Development.

The Construction and Operational Phase of the Proposed Development will provide for an increase of employment in the area which is believed to have a positive impact on human health.

The Operational Phase of the Proposed Development will result in an increase in the population of the area, and it will have a positive impact on the long-term supply needs of housing in the Sandyford area.

Therefore, on examination of the above, it is concluded that the Proposed Development is not likely to have any significant adverse impact on population and human health.

3.8.3.10 Resource and Waste Management

Construction Waste

Waste management during the construction phase will be managed in accordance with the specific CDWMP (OCSC, 19th July 2022) for the Proposed Development. The purpose of the CDWMP is to provide information necessary to outline the final management of Construction and Demolition (C&D) waste at the site and to ensure that this is undertaken in accordance with current legal and industry standards, including the Waste Management Act 1996 (as amended) and associated Regulations, Protection of the Environment Act 2003 as amended with EPA Acts 1992 to 2013, Litter Pollution Act 1997 (as amended) and the relevant Waste Management Plans. The CDWMP also provides information necessary to ensure that the management of waste produced by the site is carried out in accordance with all current legal and environmental standards. This report has been prepared in accordance with the ‘Best Practice Guidelines for the Preparation of Construction & Demolition Waste Management Plans for Construction and Demolition Projects’ document produced by the Environmental

Protection Agency. The CDWMP has estimated the category and quantity of waste that will be generated by the Proposed Development and includes recommendations for onsite waste reduction, reuse, recycling and management.

Operational Phase

During the Operational Phase, all waste will be collected by appropriately authorised waste collection contractors and will be managed using suitably licensed waste management facilities. By implementing design and actions outlined in the Operational Waste Management Plan (OWMP) (Enviroguide Consulting, July 2022), a high level of recycling, reuse and recovery will be achieved at the development in line with European targets. Recyclables and organic waste will be segregated at source to reduce the quantity of residual waste materials requiring off-site recovery or disposal.

The source segregation of waste types as detailed in this report will help to achieve the targets set out in the Eastern-Midlands Region Waste Management Plan 2015 – 2021.

The design of the waste storage area will meet the requirements as detailed in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities.

3.8.3.11 Interactions

The environmental interactions between human beings and the landscape, are deemed to be insignificant both in the short term and the long term for the construction and operation of the Proposed Development.

When considering interactions, the assessor has been vigilant in assessing pathways – direct and indirect – that can magnify effects through the interaction. In practice many impacts have slight or subtle interactions with other disciplines. However, it is concluded that most inter-relationships are neutral in impact when appropriate control measures are incorporated into the operation of the Proposed Development.

3.8.4 Probability of the Impact

No significant environmental impacts are predicted for the project during operations. Noise and dust pollution may occur during the Construction and Operational Phases; however, these are considered as not being significant or likely to cause nuisance, due to the mitigation measures that will be employed in order to ensure limit values will not be exceeded.

3.8.5 Duration, Frequency, and Reversibility of the Impact

The construction of the Proposed Development will cause permanent visual changes to the landscape, but this change will be of benefit to the surrounding area as it will assist in providing a greater number of residential units and resident support facilities that are required in this zoned land, and assist in satisfying the housing requirements of the area that can be easily serviced by sufficient public transport links, or by foot.

It is also evident that the Proposed Development will contribute positively towards addressing the national critical shortage in housing supply.

Impacts such as noise, dust and/or water pollution during the Construction Phase will be temporary and reversible through the correct implementation of the appropriate control measures.

4 SUMMARY OF ASSESSMENT FINDINGS

A summary of the findings resulting from this assessment are presented in Table 4:

Table 4 Summary of Assessment Findings

Characteristics of Proposed Project	
Size of the Subject Site	Zolbury Limited intend to apply to An Bord Pleanála for planning permission for a Strategic Housing Development on a site of c. 3.7 ha at Blackglen Road and Woodside Road, Sandyford, Dublin 18.
Cumulation with other Projects	It is not considered that cumulative impacts from the Proposed Development and other existing offsite projects are likely to result in significant effects on the environment.
Use of Natural Resources	It is not foreseen that any extensive use of natural resources is required for the Proposed Development.
Production of Waste	<p>There will be an increase in waste in the form of construction waste, during the Construction Phase of the Proposed Development. However, this waste will be segregated into the separate 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.</p> <p>Due to the scale of the Proposed Development, in combination with the use of the authorised waste collection/waste treatment facilities, it is not predicted that the production of waste will cause any likely significant effects on the environment.</p> <p>An OWMP has been prepared for the Proposed Development.</p>
Pollution and Nuisances	The construction of the Strategic Housing Development could give rise to short-lived nuisances (noise or dust). However, it is not predicted that these impacts will be significant, as they will only be temporary and short-term in duration for the Construction Phase, and adequate noise and dust mitigation

	<p>measures will be put in place for the duration of the Construction Phase of the Proposed Development. Air monitoring will be undertaken throughout the construction period as may be deemed necessary.</p> <p>Implementing the Site-Specific Construction and Demolition Waste Management Plan will ensure that all applicable environmental health and safety regulation is complied with throughout the Construction Phase thereby ensuring that the Proposed Development will not result in significant effects on human health or the environment resulting from potential pollution or nuisance, and proper site management will further reduce the likelihood of such impacts occurring.</p>
Risk of Major Accidents and/or Disasters	During operations, it is anticipated that the risk of accidents and/or disasters will be insignificant due to adherence to emergency type specific corrective action measures for potential spillages or fire.
Risk to Human Health	During the Construction and Operational Phase, due to best management practices and good housekeeping, it is not foreseen that there will be any negative impacts to human health.
Location of the Project	
Existing and Approved Land Use	<p>In the context of the County Development Plan, the Proposed Development is appropriate for the existing land use as it falls in line with the zoning objectives. The Proposed Development is considered to be located in a 'Transitional Zone' between the built-up urban areas and the high amenity lands at the foothills of the Dublin Mountains. According to the Planning Report (Brock McClure, August 2022), it is considered that the Proposed Development is an appropriate land use with no perceived negative impact on the area of open space to the northeast. All considered, the Proposed Development is considered a positive contribution to this particular transitional zone.</p>

Relative Abundance, Availability, Quality and Regenerative Capacity of Natural Resources	The impacts are considered to be negligible for this project in relation to the regenerative capacity of natural resources in the area.
Absorption Capacity of the Natural Environment	Having regard to the criteria which have been subject to analysis, it is considered that the site has a high absorption capacity to facilitate the scale and nature of the Proposed Development and there is no likelihood of significant environmental effects.
Characteristics of Potential Impacts	
Extent of the Impact	<p>It is not predicted that significant physical effects will be experienced beyond the project works area and the geographical extent of the Construction Phase is perceived to be small. The immediate area of the Proposed Development may experience a minor impact during the Construction Phase in terms of pollution and nuisance, however the works are not of such a scale or extent that would be considered likely to cause significant effect on the environment or on the population in the vicinity.</p> <p>The Operational Phase of the Proposed Development will result in an increase in the population of the area, and it will have a positive impact on the long-term supply needs of housing in the greater Dublin area.</p>
Transboundary nature of the Impact	There are no transboundary physical impacts envisaged for this project.
Magnitude and Complexity of the Impact	<p>During construction, temporary and intermittent impacts are predicted due to potential noise and dust, however these impacts will be localised and last only for the duration of this phase.,</p> <p>No significant environmental impacts are predicted for the project during operations. Noise and dust pollution may occur during the Construction and Operational Phases; however, these are considered as not being significant or likely to cause nuisance, due to the mitigation measures that will be employed in order to ensure limit values will not be exceeded.</p>

	There are no aspects to the Proposed Development which are considered to be of unusual magnitude or complexity, and any potential impacts are considered to be consistent with projects of this scale.
Probability of the Impact	No significant environmental impacts are predicted for the project during operations. Noise and dust pollution may occur during the Construction and Operational Phases; however, these are considered as not being significant or likely to cause nuisance, due to the mitigation measures that will be employed in order to ensure limit values will not be exceeded
Duration, Frequency and Reversibility of the Impact	<p>Any potential impacts associated with the Construction Phase of the Proposed Development such as noise, dust and/or water pollution will be temporary and reversible through the correct implementation of the appropriate control measures.</p> <p>The Proposed Development will cause permanent visual changes to the landscape, but this change will be of benefit to the surrounding area as the development will assist in providing a greater number of residential units that are required in this zoned land.</p>

5 EU LEGISLATION CONSIDERATION IN ACCORDANCE WITH ARTICLE 299B (1)(B)(II)(II)(C)

EU Legislation	Nature of the assessment completed	Conclusion of the assessment	How taken into account
Directive 92/43/EEC, The Habitats Directive	<ul style="list-style-type: none"> • Appropriate Assessment Screening Report • Ecological Impact Assessment • Tree Report and Survey • Architectural Design Statement 	No significant impact	Refer to Section 3.6.4 Section 3.6.6, Section 3.7.3, Section 3.8.7 and Section 3.8.8
Directive 2000/60/EC, EU Water Framework Directive	<ul style="list-style-type: none"> • Site Specific Construction and Demolition Waste Management Plan • Construction Environmental Management Plan • Site Specific Flood Risk Assessment • Appropriate Assessment Screening Report • Ecological Impact Assessment • Engineering Services Report 	No significant impact once proposed control measures are implemented.	Refer to Section 3.6.1, Section 3.6.4, Section 3.6.5, Section 3.6.6, Section 3.6.8, Section 3.7.2, Section 3.7.3, Section 3.8.3, Section 3.8.7, Section 3.8.12, Section 3.8.13
Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (SEA Directive)	<ul style="list-style-type: none"> • Dun Laoghaire Rathdown Development Plan 2016-2022 & 2022-2028 • Environmental Impact Assessment Screening Report • Planning Report and Statement of Consistency 	No significant impact once proposed control measures are implemented.	Refer to Section 3.6.2 of this report
Directive 2002/49/EC on the assessment and management of environmental noise	<ul style="list-style-type: none"> • Noise Impact Assessment • Construction & Environmental Management Plan 	No significant impact once proposed control measures are implemented.	Refer to Section 3.6.6 and Section 3.8.3
Directive 2008/50/EC on ambient air quality and cleaner air for Europe	<ul style="list-style-type: none"> • Traffic Impact Assessment • Construction & Environmental Management Plan 	No significant impact once proposed control measures are implemented.	Refer to Section 3.6.6 and Section 3.8.3

Directive 2007/60/EC on the assessment and management of flood risks	<ul style="list-style-type: none"> Flood Risk Assessment (Engineering Services Report) 	No significant impact once proposed control measures are implemented.	Refer to Section 3.7.3 and 3.8.3
Other relevant provision of EU law	Nature of the assessment completed	Results of the assessment	How taken into account
Birds Directive (79/409/EEC)	<ul style="list-style-type: none"> Ecological Impact Assessment 	No significant impact	Refer Section 3.6.4, and Section 3.8.3
Bern and Bonn Convention	<ul style="list-style-type: none"> Ecological Impact Assessment 	No significant impact	Refer Section 3.6.4, and Section 3.8.3
Ramsar Convention	<ul style="list-style-type: none"> Ecological Impact Assessment 	No significant impact	Refer Section 3.6.4, and Section 3.8.3
Directive 2006/21/EC on the management of waste from extractive industries	<ul style="list-style-type: none"> Not relevant to the Proposed Development. 	N/A	N/A
Directive (EU) 2018/850 on the landfill of waste	<ul style="list-style-type: none"> Construction & Demolition Management Plan Operational Waste Management Plan 	No significant impact	Refer to Section 3.6.1, Section 3.6.5, Section 3.6.8, Section 3.7.2 and Section 3.8.3
Directive 2008/98/EC on waste and repealing certain Directives as amended by Directive 2018/851/EU	<ul style="list-style-type: none"> Construction & Demolition Management Plan Operational Waste Management Plan 	No significant impact	Refer to Section 3.6.1, Section 3.6.5, Section 3.6.8, Section 3.7.2 and Section 3.8.3
Directive 2010/75/EU on industrial emissions	<ul style="list-style-type: none"> Not relevant to the Proposed Development. 	N/A	N/A
Regulation (EC) No 166/2006 concerning the establishment of a European Pollutant Release and Transfer Register	<ul style="list-style-type: none"> Not relevant to the Proposed Development. 	N/A	N/A

Directive 2000/14/EC on the approximation of the laws of the Member States relating to the noise emission in the environment by equipment for use outdoors	<ul style="list-style-type: none"> Noise Impact Assessment Construction & Environmental Management Plan 	No significant impact once proposed control measures are implemented.	Refer to Section 3.8.3
Directive 2012/27/EU on energy efficiency	<ul style="list-style-type: none"> Energy & Sustainability Report 	Positive impact	Refer to Section 3.8.3 of this report
Directive 2003/87/EC establishing a system for greenhouse gas emission allowance trading within the EU	<ul style="list-style-type: none"> Not relevant to the Proposed Development 	N/A	N/A
Regulation (EU) 2018/842 on binding annual greenhouse gas emission reductions by Member States from 2021 to 2030 contributing to climate action to meet commitments under the Paris Agreement and amending Regulation (EU) No 525/2013	<ul style="list-style-type: none"> Energy & Sustainability Report 	Positive impact	Refer to Section 3.8.3 of this report
Regulation (EU) 2018/841 on the inclusion of greenhouse gas emissions and removals from land use, land use change and forestry in the 2030 climate and energy framework, and amending Regulation (EU) No 525/2013 and Decision No 529/2013/EU (Text with EEA relevance)Text with EEA relevance	<ul style="list-style-type: none"> Not relevant to the Proposed Development 	N/A	N/A
Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources	<ul style="list-style-type: none"> Energy & Sustainability Report 	Positive impact	Refer to Section 3.8.3 of this report
Regulation (EU) No 517/2014 on fluorinated greenhouse gases	<ul style="list-style-type: none"> Energy & Sustainability Report 	N/A	N/A
Directive 2012/18/EU on the control of major-accident hazards involving dangerous substances, amending and subsequently repealing Council Directive 96/82/EC	<ul style="list-style-type: none"> Not relevant to the Proposed Development 	N/A	N/A

6 CONCLUSION

The Proposed Development has been assessed in accordance with the screening criteria set out in Annex III of the European Union 'EIA Directive'.

Having regard to:

- (a) the nature and scale of the Proposed Development on an urban site served by public infrastructure, and
- (b) the absence of any significant environmental sensitivities in the area

It is concluded that, by reason of the nature, scale and location of the subject site, the Proposed Development would not be likely to have significant effects on the environment. Therefore, a mandatory Environmental Impact Assessment Report (EIAR) is not required for the Proposed Development.

7 REFERENCES

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