

**EIA SCREENING REPORT &  
STATEMENT IN ACCORDANCE WITH ARTICLE  
299(B)(1)(b)(ii)(II)(C) OF THE PLANNING & DEVELOPMENT  
REGULATIONS, 2001 (AS AMENDED)**

**FOR A**

**STRATEGIC HOUSING DEVELOPMENT  
AT ST. EDMUNDS, ST. LOMAN'S ROAD, PALMERSTOWN,  
DUBLIN 20.**

**PREPARED BY**



**ON BEHALF OF**

**Moykerr Limited**

**December 2021**

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## INTRODUCTION

On behalf of the applicant, Moykerr Limited, The Grange, Newcastle Road, Lucan, Co. Dublin, this Environmental Screening Statement accompanies a application to An Bord Pleanála under Section 5 of the Planning and Development (Housing) and Residential Tenancies Act (2016) for a proposed Strategic Housing Development at St. Edmunds, St. Loman's Road, Palmerstown, Dublin 20, in accordance with the Planning and Development (Housing) and Residential Tenancies Act 2016.

The Environmental Screening Report has been prepared to assess the potential impacts on the environment of the proposed development at the subject site. The full details of the scheme are as follows:

**The proposed development comprises modifications to the previously permitted Strategic Housing Development granted on the subject site (Reg. Ref. ABP-305857-19), which is currently under construction.**

**The proposed development will provide for amendments to the permitted development as follows:**

- **Permitted Block 1 increased in height by 1 storey and will now comprise 235 no. apartments in total (an increase of 21 no. from the permitted 214 no.)**
- **Permitted Block 2 layout will be reconfigured, and increased in height by 1 storey, and will now comprise 34 no. apartments (an increase of 1 no. from the permitted 33 no.)**
- **Replacement of permitted Block 3 (a terrace of 5 no. 2 storey, 3-bed houses) with a new 4-5 storey apartment block comprising 28 no. apartments (an increase of 23 no. from the permitted 5 no.)**
- **Replacement of permitted Block 4 (a 3 storey commercial block comprising creche, gym, retail unit, community room and concierge) with a 2-5 storey block comprising 16 no. apartments, creche and residential amenity space (providing a gym, co-working space, a multi-use room, kitchenette and reception).**

**The overall development, as modified, will increase from 252 no. permitted residential units (comprising 247 no. apartments/duplexes and 5 no. houses) to 313 no. apartments in four blocks (an increase of 61 no. units) and including 137 no. 1-beds, 171 no. 2-beds and 5 no. 3-beds. The building height will now range up to 9 storeys (previously up to 8 storeys). All apartments will have associated private balconies/terraces to the north/south/east/west elevations. Permitted parking will be revised to now provide 214 no. car parking spaces (a decrease of 11 no. spaces) and 378 no. bicycle parking spaces (an increase of 70 no. spaces). All associated site services and works to enable the development including bin stores, ESB substations, associated roadworks and services connections, public and communal open spaces, vehicular access, pedestrian/cyclist connections, boundary treatment works and landscaping.**

The statement is prepared with direct input from the design team who include by McCrossan O'Rourke Manning Architects; Ronan MacDiarmada & Associates Ltd.; McGill Planning Limited; Whitehill Environmental; Kavanagh Burke Consulting Engineers; TPS Transport Limited; CLV Consulting (Noise and Vibration); Integrated Environmental Solutions; Tree Management Services; and Chris Shackleton Consulting to ensure that the possible effect on the environment has been examined through the process of an EIAR Screening process (detailed below) and the most appropriate form of development is delivered at this site.

## PURPOSE OF THIS STATEMENT

The purpose of the Environmental Screening Statement is to demonstrate that there is no requirement for the preparation of an Environmental Impact Assessment Report for the proposed development and to identify any environmental issues that might arise.

This report is supported and informed by accompanying documentation including an Ecological Impact Assessment, Statement of Screening for Appropriate Assessment prepared by Whitehill Environmental and Bat Survey prepared by Brian Keeley

## EIA SCREENING AND METHODOLOGY

The EIA Screening exercise has been guided by the following documents:

- Planning and Development Act 2000 (as amended);
- Planning and Development Regulations 2018 (as amended);
- Planning and Development (Housing) and Residential Tenancies Act 2016 (as amended);
- Directive 2011/92/EU;
- Directive 2015/52/EU;
- Transposition of 2014 EIA Directive (2014/52/EU) in the Land Use Planning and EPA Licensing Systems – Key Issues Consultation Paper (2017; DoHPCLG);
- Preparation of guidance documents for the implementation of EIA directive (Directive 2011/92/EU as amended by 2014/52/EU) – Annex I to the Final Report (COWI, Millieu; April 2017);
- European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018;
- Guidelines on the information to be contained in environmental impact assessment reports, EPA, 2017 (Draft);
- Environmental Impact Assessment – Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018; DoHPLG);
- Guidance for Consent Authorities regarding Sub-threshold Development (2003; DoEHLG)

Using the above documents, it has been possible carry out a desktop EIA Screening using the best available guidance while operating within the applicable legislation. It is noted that Directive 2014/52/EU has been transposed into Irish Legislation through the Planning and Development (Amended) Act and Planning and Development Regulations 2018. The methodology employed in this screening exercise is in accordance with the EIA Guidelines published in August 2018 by the DoHPLG and the contents of Schedule 7 and 7A of the Planning and Development Regulations 2018.

### EIA Thresholds

Schedule 5 of the Planning and Development Regulations 2018 (as amended) sets the thresholds for which if a project exceeds these limits, it then must be the subject of an Environmental Impact Assessment. Part 2 of Schedule 5 (10)(b)(i) identifies developments of more than 500 dwelling units and (iii) identifies urban development which would involve an area of greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.

The number of housing units proposed is 313 and below the 500-unit threshold, while the site area at c. 2.06ha (c. 2.72ha including SDCC Lands) is also below the 10ha threshold for “urban development” on lands comprising “other parts of a built-up area” other than a business district. The adjoining area is predominantly a residential area to the west of the Fonthill Road.

## Sub EIA Threshold Projects requiring an EIA

The screening process has changed under the new Directive (EIA 2014/52/EU) which requires the applicant to provide certain information to allow An Bord Pleanála to carry out proper screening to determine if an Environmental Impact Assessment Report is required. Schedule 7A of the Planning and Development Regulations outlines the information to be provided by the applicant or developer for the purposes of screening sub-threshold development for Environmental Impact Assessment as set out below:

- 1. A description of the project, including in particular:**
  - A description of the physical characteristics of the whole project and, where relevant, of demolition works.
  - A description of the location of the project, with particular regard to the environmental sensitivity of geographical areas likely to be affected.
- 2. A description of the aspects of the environment likely to be significantly affected by the proposed development.**
- 3. A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from:**
  - The expected residues and emissions and the production of waste, where relevant, and
  - The use of natural resources, in particular soil, land, water and biodiversity.
- 4. Compilation of the above information taking into account criteria in schedule 7 as appropriate.**

The information as set out above shall take into account the criteria set out in Schedule 7 which provides a list of criteria for determining whether development listed in part 2 of schedule 5 should be subject to an environmental impact assessment. These can be grouped under broad headings and topics as set out below:

1. Characteristics of the Proposed Development;
  - a. The size and design of the whole project;
  - b. Cumulation with other existing and/or approved projects;
  - c. The use of natural resources, in particular land, soil, water and biodiversity;
  - d. The production of waste;
  - e. Pollution and nuisances;
  - f. The risk of major accidents and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge;
  - g. The risks to human health (for example due to water contamination or air pollution).
2. Location of the Proposed Development; and
  - a. The environmental sensitivity of geographical areas likely to be affected by proposed development, with particular regard to:
  - b. The existing and approved land use;
  - c. The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;
  - d. The absorption capacity of the natural environment:
    - Wetlands, riparian areas, river mouth;
    - Coastal zones and the marine environment;

- Mountain and forest areas;
- Nature reserves and parks;
- Areas classified or protected under national legislation;
- Natura 2000 areas designated by member States pursuant to Directive 92/43/EEC and Directive 2009/147/etc;
- Areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;
- Densely populated areas;
- Landscapes and sites of historical, cultural or archaeological significance.

### 3. Type and Characteristics of the Potential Impacts

The likely significant effects of projects on the environment must be considered in relation to criteria set out in points 1 and 2 above, with regard to the impact of the project on the factors specified in Article 3 (1), taking into account:

- a. The magnitude and spatial extent of the impact (for example the geographical area and size of the population likely to be affected);
- b. The nature of the impact;
- c. The trans-boundary nature of the impact;
- d. The intensity and complexity of the impact;
- e. The probability of the impact; The expected onset, duration, frequency and reversibility of the impact;
- f. The cumulation of the impact with the impact of other existing and or approved projects;
- g. The possibility of effectively reducing the impact.

## EIA SCREENING STATEMENT

The following sections provide the information as required by Schedule 7A for the purposes of screening sub-threshold development for Environment Impact Assessment.

### A DESCRIPTION OF THE PROPOSED DEVELOPMENT

#### Physical Characteristics of the Proposed Development

This is an amendment application of a permitted development under Reg Ref ABP 305857-19. The proposal remains for 4 blocks of development but the mix, design, location and heights are altered. The revised residential development will provide 313 residential units across 4 no. blocks and a creche, and residential amenity facilities including a gym, co-working area, multi-purpose rooms and a reception. The residential units comprise:

- 313 no. apartments within 4 no. 2-9 storey blocks comprising 137 no. one bed units, 171 no. two bed units, and 5 no. three bed units;
- All of the residential units will have associated private open space/ balconies/ terraces facing north/ south/ east/ west; and associated car parking and cycle parking.

The proposed development will provide for amendments to the permitted development as follows:

- Permitted Block 1 increased in height by 1 storey and will now comprise 235 no. apartments in total (an increase of 21 no. from the permitted 214 no.)
- Permitted Block 2 layout will be reconfigured, and increased in height by 1 storey, and will now comprise 34 no. apartments (an increase of 1 no. from the permitted 33 no.)
- Replacement of permitted Block 3 (a terrace of 5 no. 2 storey, 3-bed houses) with a new 4-5 storey apartment block comprising 28 no. apartments (an increase of 23 no. from the permitted 5 no.)
- Replacement of permitted Block 4 (a 3 storey commercial block comprising creche, gym, retail unit, community room and concierge) with a 2-5 storey block comprising 16 no. apartments, creche and residential amenity space.
- Alterations to the landscaping.

In addition to redesigned blocks all other site services and works to enable the development of the site will also be provided including car and cycle parking, bin stores, ESB substations, associated roadworks and services connections, a large quantity of public and communal open space, boundary treatment works and landscaping.





Figure 1 Proposed Site Plan



Figure 2 Permitted site plan (which is subject to amendment as a result of this application)



### Location of the proposed development

The subject site is located c. 11km west of Dublin City Centre and 750 m west of Liffey Valley Town Centre on St. Loman's Road, Palmerstown, Dublin 20, on a site area of c. 2.06 ha (c. 2.72 ha including SDCC Lands).

The site is bounded to the south by the St. Loman's Road, to the west by a previous phase of St. Edmund's residential development, to the east by the Fonthill Road (R113) which is a 5 lane road and a large roundabout, to the north by lands in the ownership of St. Loman's Hospital and to the north east by lands allocated for traveller accommodation.

There is a bus stop and bus lane along this road which is serviced by bus a number of high frequency routes including nos. 25, 25a, 25b, 25d, 66, 66a, 66b, 66e and 67. The bus from the site to the city centre takes c. 25 minutes. To the south of the site along Fonthill Road North there is a bus stop serviced by bus routes nos. 40 and 51d.

Vehicular access to the site is from an existing shared unnamed road with St. Edmund's Park to the west of the subject site. There will be a number of pedestrian entrances along St. Loman's Road, the Fonthill Road (R113) and the unnamed road to the west. These are the same as the permitted development.

Since the grant of permission under ABP 305 857-19, construction works have commenced on site. The entire site has been cleared and construction has commenced on block 1. The site is now dominated by buildings, artificial surfaces/ spoil and bare ground with some pockets of vegetation remaining around the perimeters. The western boundary comprises a row of trees which are being retained in this development and the northern boundary comprises of metal fencing which separates the site from the Ballydowd Special Care Unit.

There are a broad range of uses surrounding the subject site. The area east of the site is Liffey Valley Town Centre which comprises of retail and recreational services, to the north and south by educational and health buildings, further south is Fonthill Retail Park and to the west is largely categorised by residential developments.

The site is free from structures, and it is not located within a Conservation Area or an Architectural Conservation Area. A pedestrian footpath and cycle lane separate the site from the St. Loman's Road and the Fonthill Road (R113). The topography of the site rises from the west of the site to the east (max c. 2.6m) and rises from the north of the site to the south (max c. 1.8m).

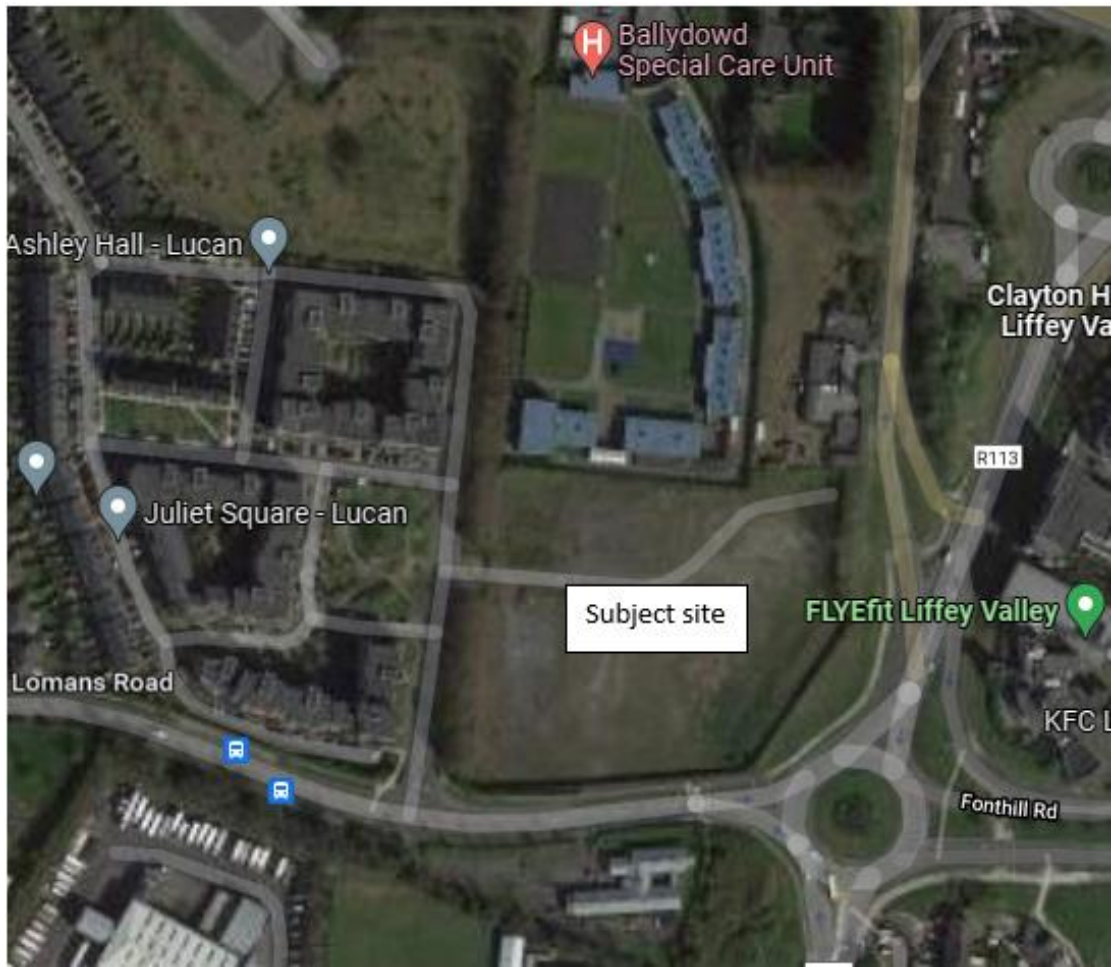


Figure 3 Site Location Map, Google 2019

## A DESCRIPTION OF THE ASPECT OF THE ENVIRONMENT LIKELY TO BE SIGNIFICANTLY AFFECTED BY THE PROPOSED DEVELOPMENT

This section provides examines the possible effects on the environment under the topics prescribed by Directive 2014/52/EU. This approach provides a comprehensive description of the aspects likely to be affected by the proposed development that have not been identified.

### Population & Human Health

The site is bounded to the south by the St. Loman's Road, to the west by a previous phase of St. Edmund's residential development, to the east by the Fonthill Road (R113) which is a 5 lane road and a large roundabout, to the north by lands in the ownership of St. Loman's Hospital and to the north east by lands allocated for traveller accommodation. There are no other sites currently under construction in the adjoining area. The permitted development, which this application is amending, is currently on site and under construction.

During the construction phase, which has been commenced under the permitted development grant Reg. Ref. ABP-305857-19, there may be possible short-term nuisances to human beings from noise and dust during construction. Once mitigated in accordance with an agreed Construction Management Plan (CMP), (as per condition 23 of the permitted development) it is not anticipated that the construction works would result in significant environmental impacts for the local population and human health.

There are no operational impacts associated with this residential development that would be likely to cause significant effects in terms of population and human health.

### Biodiversity

Biodiversity is not likely to be significantly affected by the proposed development. Construction work has commenced on site for the permitted development. The entire site has been cleared and construction has commenced along with associated infrastructure. The site is now dominated by buildings, artificial surfaces/ spoil and bare ground, with some pockets of vegetation remaining around the perimeter. There are currently no habitats suitable within the site for any protected mammal species. This amendment will not lead to the loss of any habitats that are of ecological value on any level. The existing treeline on site may provide some perching and nesting sites for local populations of passerine birds; however, this treeline is to be retained in the main as part of the landscape proposals. Furthermore, the site is considered of low suitability for bat as per the report submitted.

Furthermore, an AA Screening assessment has been carried out and it has found: *"Having regard to the location, nature and scale of the proposed development, it is considered that there is no potential for significant effects either from the proposed development on its own or in combination with other plans and projects"*. Please refer to the Statement of Screening for Appropriate Assessment prepared by Whitehill Environmental for further detail.

### Lands and Soils

The subject lands are a construction site and site clearance works (associated with the permitted ABP 305857) are completed resulting in artificial surfaces/ spoil and bare ground. It was previously vacant, unused land. The land is undulating and slopes from west to east and north to south. The topography of the site rises from the west of the site to the east (max c. 2.6m) and rises from the north of the site to the south (max c. 1.8m). The construction of the scheme, in accordance with standard best practice standards would not use such a quantity of soils or water to result in significant effects on the environment.

The site has minimal existing vegetation. The proposal includes high quality landscaping, planting and SUDS measures to be incorporated into the development to ease water runoff.

### Water

The site does not adjoin any significant waterways and it is considered that, as with the permitted development, there are no anticipated significant effects on the existing water environment arising from the proposed development.

The proposed water supply, as per the permitted development, will be via a connection to the existing Local Authority watermain. The proposed development, as with the permitted development, will also connect into the existing surface water drainage and foul water drainage system.

The existing local authority watermain traversing the site to be rerouted as shown in the Kavanagh Burke drawings and provided with bulk water meter and associated SV's.

The use of accepted SUDS measures which are built into the design of the project and are being used throughout the site to enable sustainable urban drainage including permeable paving, attenuation proposals and significant amounts of green public open space and green routes through the site will ensure negative impacts to water quality do not arise from surface water run-off when the project is established. These have been amended in line with requests from South Dublin County Council and these alterations have been agreed.

Please refer to Drainage Design Report and Drawings prepared by Kavanagh Burke Consulting Engineers for full details on water proposals throughout the site.

### Air, Noise and Climate

Similar to the permitted development, there is minimal impact on air pollution expected from the development at construction stage outside of the potential dust impact, and therefore the risk to human health is considered negligible in this regard. Standard mitigation measures will be employed as part of an agreed CMP (as per condition 23 of the grant of permission under ABP 305857-19 ).

It is expected that traffic noise is the main source of noise during the operational phase, CLV have prepared a Traffic Noise Impact Assessment and recommended mitigation measures, and these have been included in the scheme. This report concludes that *“Assuming the above developed mitigation measures are properly incorporated into the development design, the BS 8233 internal noise level criteria should be comfortably achieved and the magnitude of the inward noise impact would therefore be considered negligible.”* Please see the report prepared by CLV for further details.

There are no envisaged air or noise emissions arising from the residential proposal at this site other than noises arising from construction and operational traffic associated with the development.

Air, Noise and Climate are not likely to be significantly affected by the amendments to the permitted development as set out in this proposed development.

### Landscape & Visual

A detailed Landscape Masterplan has been submitted with this application and it is submitted that the overall development will have a positive impact on the landscape features of the site. These propose some minor alterations to the landscaping when compared to the permitted development. These are all considered to be improvements to the overall permitted development. Please refer to the

documentation and drawings prepared by Ronan Mac Diarmuida and Associates Ltd., Landscape Architects and Consultants for further detail.

There are no sensitive landscape designations pertaining to the subject site. The proposed development will not impact on any designated views or prospects within the South Dublin County Council Development Plan. No significant amenity, landscape or visual effects are likely to arise from the proposed development.

### Material Assets

The land on which the site is situated is a material asset. It has been zoned for development through the appropriate process, and as such, the use of this material asset in a manner compatible with the zoning designation, is entirely appropriate. The increase in the number of units and the more efficient use of the land as a result is an improvement on the sustainability of the site when compared to the permitted development. Once constructed, the operational phase will provide an important material asset for the area in terms of residential units and community employment.

In terms of existing utilities, the proposed development will require access to the local water supply, wastewater, public roads infrastructure, electricity supply, telecommunications, municipal waste management and gas, all of which are readily available. The additional demand from the proposed development, above that of the permitted, on these services can be facilitated and will not lead to any negative environmental impacts. Equally the construction of the development will not negatively impact on existing services.

### Archaeology, Architecture and Cultural Heritage

As acknowledged in the permitted development, the subject lands are not proximate to any Protected Structure or Architectural Conservation Area. The site is not located within an area of archaeological interest and therefore is not expected to have any impacts on archaeology, architectural or cultural heritage.

An archaeological assessment carried out as part of original St. Edmunds permission in 2005 (SDCC Reg. Ref.: SD05A/0090) noted the following:

*“there are no recorded archaeological sites in the area of the proposed development and a recent field inspection revealed nothing of an architectural or archaeological nature within its boundaries. The nearest sites are located to the east of the site and consist of a holy well (700m).*

*The proposed development site appears from cartographic evidence to have remained undeveloped agricultural land until the mid-twentieth century and on early historic maps as agricultural land. No structures are depicted on any of these maps.”*

### Vulnerability of the project to risks of major accidents and/ or disasters.

As with the permitted development, this amendment application will ensure that standard construction practices will be employed throughout the construction phase. The subject lands are not proximate to any Seveso/COMAH designated sites. The Site-Specific Flood Risk Assessment for the site indicates that the subject site is within Flood Zone C, with a low probability of flooding. The proposed development is not considered vulnerable to major accidents and/ or disasters, and therefore the expected effects are considered to be negligible.

### Inter-relationship between the above factors

It is considered that any of the previously identified relatively minor impacts would not in themselves be considered significant nor would they cumulatively result in a likely significant effect on the environment.



## **A DESCRIPTION OF ANY SIGNIFICANT EFFECTS TO THE EXTENT OF THE INFORMATION AVAILABLE ON SUCH EFFECTS OF THE PROPOSED DEVELOPMENT ON THE ENVIRONMENT**

This includes information available on the environment including:

- (a) the expected residues and emissions and the production of waste, where relevant, and
- (b) the use of natural resources, in particular soil, land, water and biodiversity.

It is expected that there will be some normal residues/emissions during the construction stage associated with the development works proposed as part of this amendment application which include ground preparation works, development of site infrastructure, construction of buildings and hardstanding areas and landscaping of the site including open soft landscaped areas.

Standard mitigation measures will be employed and monitored. These are set out in the Construction & Demolition Waste Management Plan and the Operational Waste & Recycling Management Plan accompanying this application and are similar to those proposed in the permitted development. As such residues and emissions are not considered likely to have potential to cause significant effects on the environment.

As with the permitted development, there will be some waste materials produced in the construction of the proposed scheme which will be disposed of using licensed waste disposal facilities and contractors. As is standard practice the scale of the waste production in conjunction with the use of licensed waste disposal facilities and contractors will not cause concern for likely significant effects on the environment. The quantum will be similar to that in the permitted development.

The Operational Waste & Recycling Management Plan accompanying this application is standard practice and sets out the measures that will be used to maximise the quantity of waste recycled by providing sufficient waste recycling infrastructure, waste reduction initiatives and waste collection and waste management information to the residents of the development. As there is an increase in the number of units there is an increase in the quantum of waste that will be generated by the residents. However, this is not a significant quantum and will be managed in the same way as the permitted development.

There will be no large scale use of natural resources. The main use of natural resources will be land. The subject lands are zoned for residential use.

Other resources used will be construction materials which will be typical raw materials used in construction of residential and employment developments. The scale and quantity of the materials used will increase compared to the permitted development but not be such that would cause concern in relation to significant effects on the environment.

Similarly the construction or operation of the scheme will increase as a result of this amendment to the permitted but would not use such a quantity of water to cause concern in relation to significant effects on the environment. The use of natural resources in relation to the proposed development is not likely to cause significant effects on the environment.

## COMPILATION OF THE ABOVE INFORMATION TAKING SCHEDULE 7 CRITERIA, AS APPROPRIATE, INTO ACCOUNT

The compilation of the above information and assessing the development against the Schedule 7 criteria:

<b>Characteristics of Proposed Development</b>	
The size of the proposed development.	The site is c. 2.06ha (c. 2.72ha including SDCC Lands) and the development is for 313 residential units (61 more than permitted under ABP 305857-19). The development is sub-threshold for EIA.
The culmination of other proposed development.	<p>This is a built-up suburban area with no available brownfield sites in the immediate vicinity.</p> <p>The adjoining residential developments to the west (Ashley Hall, St. Edmunds Park, Juliet Square, etc) were development in 2006/7 under permission SD05A/0090 and have been built and occupied for c.12 years. Other immediate developments to the south and east (on the opposite side of the public roads) have been built over the past 10 -25 years.</p> <p>The permitted development ABP 305857-19, which this is amending, is currently under construction on this site.</p>
The nature of any associated demolition works.	No demolition works associated with this proposed development.
The use of natural resources, in particular land, soil, water and biodiversity.	Construction has commenced on site for the permitted development. The entire site has been cleared and construction has started for the apartments. This site is now dominated by buildings, artificial surfaces/ spoil and bare ground with some pockets or vegetation remaining around the perimeters. High quality landscaping, planting and SuDS measures will be incorporated into the development to ease water runoff. There is currently no suitable habitats within the site for any protected mammal species and minimal flora apart from the perimeter trees which are being retained in the majority.
The production of waste.	<p>Construction waste produced will be controlled, stored and disposed of in a sustainable manner as per relevant environmental guidance and in line with the previously permitted scheme. A Construction Management Plan, in line with condition 23 of the permitted development, will be agreed with South Dublin County Council .</p> <p>As with the permitted development operational waste for the residential development will be controlled by each household and dealt with by municipal services. Estate management will control pollution of public areas.</p>
Pollution and nuisances.	The construction phase, in line with the current situation for the permitted development, will create short term negative impacts particularly in terms of dust and noise.

	An agreed Construction Management Plan will ensure that construction activities are properly controlled and mitigated.
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	None.
The risks to human health (for example, due to water contamination or air pollution).	There is potential negative impact at construction stage in terms of noise and dust. However, these will, similar to the permitted development, be short term in duration and will be mitigated in accordance with an agreed Construction Management Plan.
<b>Location of Proposed Development</b>	
The existing and approved land use.	This site is currently vacant and site clearance works associated with the permitted SHD proposal (ABP 305857) are completed and construction of the permitted development is currently underway on site.
The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground.	This is an allocated suburban site that will be used as a high-density development appropriate to its location. The provision of significant quantities of open spaces planted with native hedges and trees will be positive for re-establishing biodiversity on the site.. The use of SuDs will also support biodiversity and will ensure a properly controlled water regime.
The absorption capacity of the natural environment, paying particular attention to the following areas: (i) wetlands, riparian areas, river mouths; (ii) coastal zones and the marine environment; (iii) mountain and forest areas; (iv) nature reserves and parks; (v) areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive and; (vi) areas in which there has already been a failure to meet the environmental quality standards laid down in legislation of the European Union and relevant to the project, or in which it is considered that there is such a failure; (vii) densely populated areas; (viii) landscapes and sites of historical, cultural or archaeological significance.	<p>The site itself is not located within a wetland, river mouth, coastal zone, marine environment, mountain, forest, nature reserve, park, or protected site.</p> <p>The proposal is an amendment to a permitted development that is currently under construction on this suburban site. It will not have a detrimental impact on any of these areas beyond that of the permitted development or indeed any other small to medium development site would have on any such areas. It is worth noting that the development will result in a change to land use which could affect the pattern of surface water run-off. However, SUDS have been incorporated which ensures that the quantity and quality of the run off will revert to a green field rate.</p> <p>A Statement of Screening for Appropriate Assessment has been completed for this amendment application. This confirms that <i>“In view of best scientific knowledge and on the basis of objective information, it can be concluded that this application, whether individually or in combination with other plans and projects, will have no impacts upon the Natura 2000 sites. The integrity of these sites will be maintained, and the habitats and species associated with these sites will not be adversely affected. It is of the opinion of this author that this application does not need to proceed to Stage II of the Appropriate Assessment process.”</i></p>

Types and characteristics of potential impacts	
The magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected).	<p>As with the permitted development, it is expected that the proposed amendment development will not have any environmental impact beyond the site and immediate vicinity.</p> <p>All construction activities will be governed by a Construction Management Plan .</p>
The nature of the impact.	<p>Similar to the permitted development the potential likely and significant impacts arising from the development will be typically those associated with a medium sized residential development in an area designated for growth. The nature of the impacts are expected to be of a magnitude similar to the permitted development and the amendment application will not result in an impact that would be significant, adverse or permanent.</p> <p>The impact of the development at operational stage will be a small increase above that of the permitted development and will be typical of this established residential area and will not be significant or adverse.</p>
The transboundary nature of the impact.	As with the permitted development any minor impacts will be contained in the immediate vicinity of the site. The subject lands are not located on any geographical or other boundary of relevance to assessment of likely significant effects on the environment.
The intensity and complexity of the impact.	The proposed development for an increase in the number of units by 61 above that permitted is not of any significant intensity or complexity such that would be likely to cause significant effects on the environment.
The probability of the impact.	It is probable that the minor impact of noise and pollution during the construction phase will occur; however, construction works on zoned lands within the area are not unexpected or out of character, and working hours will be limited to hours set by the planning conditions.
The expected onset, duration, frequency and reversibility of the impact.	The minor impacts identified would occur during the construction phase, which is currently ongoing through the permitted development, there are no significant negative impacts which are considered likely to occur during the operational phase of the proposed residential development. The frequency of impacts will vary throughout the construction phase; however, the impact is still not considered to be significant. The minor impacts associated with the construction phase such as noise, dust and traffic will be temporary.
The cumulation of the impact with the impact of other existing and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development	The subject site is zoned land designated for residential use. The scale of the proposed scheme, which amends an existing permitted development, and any other permitted developments in the vicinity

<p>the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment.</p>	<p>are not such that the characteristic of any potential impacts, in combination with each other, are likely to cause significant effects on the environment.</p> <p>There are no other planned or recent developments in the immediate vicinity which would be the subject of EIA requirement.</p>
<p>The possibility of effectively reducing the impact.</p>	<p>As with the permitted development currently on site, appropriate mitigations measures will be undertaken in order to ameliorate effects on the environment arising from the proposed development. Any mitigations measures to manage noise, dust and/or pollution during the construction phase will be based on standard best practice, policies and guidance.</p>

## **APPROPRIATE ASSESSMENT SCREENING REPORT**

A Statement of Screening for Appropriate Assessment has been carried out for this site. It has found that this development occurs on a site that is of low ecological sensitivity of the subject lands.

The conclusion of the report finds that *“In view of best scientific knowledge and on the basis of objective information, it can be concluded that this application, whether individually or in combination with other plans and projects, will have no impacts upon the Natura 2000 sites. The integrity of these sites will be maintained, and the habitats and species associated with these sites will not be adversely affected. It is of the opinion of this author that this application does not need to proceed to Stage II of the Appropriate Assessment process.”*

## **CONCLUSIONS**

In conclusion, it is respectfully submitted that an EIAR is not required for the proposed development, which is an amendment to a permitted development, as the proposal remains below the thresholds of Schedule 5 of the Planning and Development regulations. The AA Screening Report also outlines that the proposal is unlikely to have effects on the Natura 2000 Network, either alone or in combination with other plans; the development will be connected to public services such as water and foul systems; standard construction practices can be employed to mitigate any risk of noise, dust or pollution; and no identified impact in this screening exercise either individually or cumulatively will have significant impacts on the environment.

In conclusion, it is considered that the proposed development will not have any significant impacts on the environment. All recommended mitigation measures and standard practices will be employed throughout the construction and operation phase of the development to ensure that the proposed development will not create any significant impacts on the quality of the surrounding environment.



## APPENDIX A: STATEMENT IN ACCORDANCE WITH ARTICLE 299B(1)(B)(II)(II)(C) OF THE PLANNING AND DEVELOPMENT REGULATIONS, 2001 (AS AMENDED)

As per Article 299B(1)(b)(ii)(II)(C) of the Planning and Development Regulations the following statement outlines how the results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive (Directive 2014/52/EU) have been taken into account in the assessments prepared as part of this planning application.

DIRECTIVE	SUMMARY	ASSESSMENTS CARRIED OUT AS PART OF THIS SHD PLANNING APPLICATION	STATEMENT
<p><b>Directive 92/43/EEC, The Habitats Directive</b></p>	<p>The EU Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive 1992) provides protection to designated species and habitats throughout Europe. The Habitats Directive has been transposed into Irish law through the EC (Birds and Natural Habitats) Regulations 2011.</p> <p>The Habitats Directive aims to protect some 220 habitats and approximately 1000 species throughout Europe. The habitats and species are listed in the Directives annexes, where Annex I covers habitats and Annex II, IV and V cover species. There are 59 Annex I habitats in Ireland and 33 Annex IV species which require strict protection wherever they occur. The Directive requires the designation of Special Areas of Conservation for areas of habitat deemed to be of European interest. The SACs together with the SPAs from the Birds Directive form a network</p>	<p><b>Ecological Impact Assessment prepared by Whitehill Environmental.</b></p> <p><b>Statement of Screening for Appropriate Assessment prepared by Whitehill Environmental.</b></p>	<p>The Screening for Appropriate Assessment confirms that “</p> <p><i>The application site has no hydrological or ecological connectivity to any Natura 2000 site. The construction and operation of the proposed development will have no significant effect upon the Natura 2000 sites identified. There are no individual elements of the proposed project that are likely to give rise to negative impacts on these sites. There is a sufficient distance between the application site and all Natura 2000 sites to ensure that potential direct and indirect impacts will be avoided. There will be no impacts upon the Qualifying Interests of any designated site.</i></p> <p>”</p> <p>It is worth noting that “<i>there are eight Natura 2000 sites within 15km of the application site. The closest of these is the Rye Water/Carton SAC</i></p>

	of protected sites called Natura 2000.		<p><i>and this is 5.6km west of the application site. There is no hydrological connectivity between the application site and this SPA/SAC, or any other SPA/SPA within 15km of the site.</i></p> <p>The Screening for Appropriate Assessment also confirms that “  <i>Neither the permitted nor the proposed amendment to this scheme (i.e., the proposed development) will lead to significant effects upon any European site.</i>  ”</p>
<b>Directive 2000/60/EC, EU Water Framework Directive</b>	The EU Water Framework Directive (WFD) 2000/60/EC aims to prevent any deterioration in the existing status of water quality, including the protection of good and high water quality status where it exists. The Directive runs in 6-year cycles with the current cycle from 2016 – 2021. The WFD requires member states to manage their water resources on an integrated basis to achieve at least ‘good’ ecological status, through River Basin Management Plans (RBMP), by 2027.	<p><b>Ecological Impact Assessment prepared by Whitehill Environmental.</b></p> <p><b>Statement of Screening for Appropriate Assessment prepared by Whitehill Environmental.</b></p> <p><b>Construction &amp; Demolition Waste Management Plan prepared by Traynor Environmental.</b></p>	<p>The relevant reports prepared as part of the planning application confirm that appropriate surface water management and discharge measures will be undertaken to ensure no significant impacts arise.</p> <p>The surface water runoff generated from the proposed development will be routed through a series of Sustainable Urban Drainage System (SuDS) elements which will facilitate the detention and infiltration at source. These devices include green roofs, permeable paving, swales and carriageway runoff infiltration via tree pits, etc. Only once the rainfall has passed through these devices will the excess</p>

			<p>runoff enter the drainage network and then reach the underground (StormTech or equivalent type) attenuation system. The flow control device will be installed on the outfall to limit runoff from this proposed development into the existing surface water network / attenuation tank serving the existing St Edmunds Estate.</p> <p>An underground surface water attenuation tank is proposed as the main runoff quantity reducing SuDS device.</p> <p>These proposals are amended slightly when compared to the permitted development but will achieve the same outcome in terms of protecting water quality and management of water resources and run off as the permitted development.</p>
<p><b>Directive 2001/42/EC, SEA Directive</b></p>	<p>The SEA Directive pertains to a broad range of public plans and programmes that are subject to environmental assessment during their preparation prior to their adoption.</p> <p>The aim is to ensure that environmental considerations are regarded in the preparation, adoption and implementation of such plans.</p> <p>The South Dublin County Development Plan 2016-</p>	<p><b>Planning Report prepared by McGill Planning Ltd which includes a Statement of Consistency &amp; Material Contravention Statement</b></p>	<p>The South Dublin County Development Plan 2016-22 and relevant national and regional plans has been consulted when preparing the relevant documents which make up this SHD Application.</p> <p>In particular the Statement of Consistency outlines in detail how the proposed development complies with the policies and objectives of the South Dublin County Development Plan, the National Planning Framework, the Regional Spatial &amp; Economic</p>

	<p>2022 is the plan which sets out the overall strategy for the proper planning and sustainable development of South Dublin area and the subject site.</p> <p>The County Development Plan was prepared in accordance with the requirements of the Planning and Development Act, 2000 (as amended), the Planning and Development (Strategic Environmental Assessment) Regulations, 2004 as amended.</p> <p>National and regional policies (including the National Planning Framework, Regional Spatial &amp; Economic Strategies, and Section 28 Ministerial Guidelines) are also subject to SEA.</p>		<p>Strategy for the Eastern &amp; Midlands Region, and a number of Section 28 Planning Guidelines.</p> <p>Where the application is not in compliance with the County Development Plan a Material Contravention Statement is included which identifies where the contravention is and how it is in accordance with National and Regional Planning Guidance.</p> <p>The proposed development is an amendment of a permitted development by ABP (305857-19). The proposed amendment result in an increase in density and height but are fully in accordance with the zoning of the site and inline with the previously permitted development.</p>
<p><b>Directive 2002/49/EC, Environmental Noise Directive</b></p>	<p>The Environmental Noise Directive relates to the assessment and management of environmental noise. The Directive has been transposed into Irish law through the Environmental Noise Regulations 2006, as amended, which came into effect on 3<sup>rd</sup> April 2006.</p> <p>These Regulations apply to environmental noise to which people are exposed, in particular in built up areas, in public parks or other quiet areas in an agglomeration, in quiet areas in open</p>	<p><b>Traffic Noise Impact Assessment prepared by CLV Consulting</b></p>	<p>During the operational phase the main source of noise identified is vehicular traffic. As this is a residential development it is not envisaged that it will generate undue levels of noise. Mitigation measures, detailed in the Traffic Noise Impact Assessment, have been designed into the scheme to protect future residents living in the development. These are set out in full in the CLV Consulting report.</p> <p>These proposals are similar to the mitigation measures</p>

	country, near schools, near hospitals, and near other noise-sensitive buildings and areas. They are intended to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to exposure to environmental noise.		proposed for the permitted development.
<b>Directive 2008/50/EC on ambient air quality and cleaner air for Europe</b>	<p>The ambient air quality and CAFÉ Directive defines objectives for ambient air quality designed to avoid, prevent or reduce harmful effects on human health and the environment as a whole.</p> <p>It sets out measures for the assessment of ambient air quality in Member States as well as for obtaining information on ambient air quality in order to help combat air pollution and nuisance.</p> <p>The Directive aims at increasing cooperation between the Member States in reducing air pollution.</p> <p>The Directive was transposed into Irish legislation by the Air Quality Standards Regulations (S.I. No. 180 of 2011).</p>	<b>Construction &amp; Demolition Waste Management Plan by Traynor Environmental</b>	<p>In accordance with the Construction &amp; Demolition Waste Management Plan, Dust prevention measures will be put in place for any particulate pollution.</p> <p>The extent of dust generation under construction activities being carried out is dependent on environmental factors such as rainfall, wind speed and wind direction. The most likely sources of dust generation at this site include excavation of soils stripping and excavation of foundations for the main building. Some of this has already commenced on site under the permitted development. This proposal will not alter these sources significantly.</p> <p>Waste will be stored on site in such a manner as to prevent environmental pollution by implementing dust control measures.</p>
<b>Directive 2007/60/EC on the assessment and management of flood risks</b>	The Directive on the assessment and management of flood risks establishes a framework for measures to reduce the risk of	<b>Engineering Assessment and Surface Water Drainage Design Report prepared by Kavanagh Burke</b>	The site's existing ground elevations range from approximately 64.0m OD (Malin) in the eastern area of the site (SDCC portion of

	<p>floods within the EU and requires EU states to assess the risk of flooding in coastal regions and river basins by collecting historical data and defining the natural / physical environment.</p> <p>States must also establish flood-risk management plans that are coordinated at the level of the river basin or coastal districts.</p> <p>These plans establish objectives for the management of flood risks, focusing mainly on prevention (e.g., avoiding construction in areas that may flood), protection (measures to reduce the likelihood of floods in a specific place) and preparedness (informing the public about flood risks and what do to in the event of flooding).</p> <p>The Directive was transposed into Irish legislation by the European Communities (Assessment and Management of Flood Risks) Regulations 2010.</p>	<p><b>Consulting Engineers</b></p>	<p>the land) to 61.40m OD (Malin) along the northeast boundary of the site.</p> <p>The subject site is located within Flood Zone C of the CFRAM flood maps that shows that the probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1000 for both river &amp; coasted flooding) (refer to Appendix E). Therefore, the site is at minimal risk of flooding</p> <p>The flood risk assessment concludes that there is no significant risk of flooding and, given the SuDs measures incorporated in the proposed development there will be decreased risk of flooding to public infrastructure post development.</p> <p>This amendment proposal will not alter the flood risk potential of this site or the surrounding area when compared to the permitted development under construction on site.</p>
<p><b>SEVESO DIRECTIVE 82/501/EEC, SEVESO II DIRECTIVE 96/82/EC, SEVESO III DIRECTIVE 2012/18/EU</b></p>	<p>The Seveso Directive (Directive 82/501/EEC, Directive 96/82/EC, Directive 2012/18/EU) was developed to avoid major accidents involving dangerous chemicals which pose a significant threat to humans and the environment.</p> <p>EU Directive (96/82 EC) was transposed into Irish Law through the SI EC</p>	<p>N/A</p>	<p>Section 7.6.0 of the South Dublin County Council Development Plan 2016-2022 notes that the locations of current SEVESO sites within the county are mapped on the Development Plan map.</p> <p>The nearest Seveso sites within the South Dublin County Council District are</p>



	<p>(Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2000 (S.I. No. 476 of 2000), on December 21st, 2000.</p> <p>Directive 2012/18/EU was transposed into Irish legislation through S.I. No. 209 of 2015 Chemicals Act (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2015. S.I. No. 209 of 2015 came into effect on June 1st, 2015.</p>		<p>Kayfoam (4.42km), Woolfson BOC Gases Ireland (4.85km), Irish Distillers Ltd (5.03km) and Johnston Logistics (11.8km).</p> <p>These are considered to be of sufficient distance that the site will not impact on these sites.</p> <p>This proposed amendment proposal will not have any greater impact on these than the permitted development</p>
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