awnconsulting

The Tecpro Building,
Clonshaugh Business & Technology Park,
Dublin 17, Ireland.

T: + 353 1 847 4220
F: + 353 1 847 4257
E: info@awnconsulting.com
W: www.awnconsulting.com

ENVIRONMENTAL IMPACT ASSESSMENT SCREENING REPORT FOR A PROPOSED STRATEGIC HOUSING DEVELOPMENT ON LANDS AT DOLCAIN HOUSE, CLONDALKIN, CO. DUBLIN.

Report Prepared For
Randelswood Holdings Ltd

Report Prepared By

Liam Bruen & Jonathan Gauntlett
Environmental Consultant

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Cork Office
Unit 5, ATS Building,
Carrigaline Industrial Estate,
Carrigaline, Co. Cork.
T: + 353 21 438 7400
F: + 353 21 483 4606

AWN Consulting Limited
Registered in Ireland No. 319812
Directors: F Callaghan, C Dilworth,
T Donnelly, T Hayes, D Kelly, E Porter

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1.0 INTRODUCTION

On behalf of Randelswood Holdings Ltd (the Applicant), AWN Consulting Limited (AWN) has prepared the following Environmental Impact Assessment (EIA) Screening Report to accompany the planning application for a proposed Strategic Housing development at Dolcain House, Monastery Road, Clondalkin, Dublin 22.

The proposed development consists of change of use of the existing Blocks A, B and C at Dolcain House from office use to residential use which range in height from 4-5 storeys over basement, construction of a new Block D which will contain 29 no. apartment units located to the east of Block B, together with modifications to the existing blocks and associated works. A total of 130 apartment units are proposed.

The site is within Zoning objective 'RES' of both the 2016-2022 SDCC Development Plan and 2022-2028 SDCC Draft Development plan which aims to "protect and/or improve residential amenity". The total application site area is 0.81 Ha. The site is served by existing infrastructure including watermains, foul water sewer and utilities. The existing vehicular access will be retained, from the Woodford Hill/Monastery Road roundabout. A single pedestrian/cycle access is provided to the north of the development by way of steps and a ramp. The proposed development will include the associated roads, car parking, open spaces and ancillary works.

The proposed development site is outlined in red on Figure 1.1. The development is described in further detail in Section 2 below.

Figure 1-1. Proposed Development Site (in red) (source: Google Earth)

The purpose of this report to provide the planning authority with the information required under Schedule 7A to demonstrate the likely effects on the environment, having regard to the criteria set out in Schedule 7 of the Planning and Development Regulations 2001, as amended. This information will enable planning authority to

undertake a screening determination in respect of the need for an Environmental Impact Assessment Report (EIAR) for the proposed development. This report also summarises and documents the studies undertaken by the Applicant, and the design team, which demonstrate there are no significant effects predicted as a result of the proposed development and the application can be determined by planning authority without an EIAR having been submitted.

There is a mandatory requirement for an EIA Report to accompany a planning application for some types of development that meet or exceed the "thresholds". In addition to the mandatory requirement, there is a case-by-case assessment necessary for sub-threshold developments as they may be likely to have significant effects on the environment. If a sub-threshold development is determined to be likely to have significant effect on the environment, then an EIA Report will be required.

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

AWN Consulting, the design team, and specialist subconsultants have undertaken an assessment on the likelihood of significant effects on the environment from the proposed development. The assessment is documented in Section 3.0, 4.0. and 5.0 and covers each aspect of the environment in accordance with guidance including; Population and Human Health; Biodiversity; Land, Soils, Geology, Hydrogeology, and Hydrology; Air Quality and Climate; Noise and Vibration; Landscape and Visual Impact; Cultural Heritage, and Archaeology; Traffic and Transportation; Material Assets, and Waste.

1.1 EIA SCREENING LEGISLATION AND GUIDANCE

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

- European Union (Planning & Development) (Environmental Impact Assessment) Regulations 2018;
- Environmental Impact Assessment of Projects – Guidance on Screening. (2017). European Commission.
- Environmental Impact Assessment of Projects - Guidance on the preparation of the Environmental Impact Assessment Report. (2017) European Commission.
- Transposition of 2014 EIA Directive (2014/52/EU) in the Land Use Planning and EPA Licensing Systems – Key Issues Consultation Paper (2017:DoHPCLG)
- 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, Milieu; April 2017);
- European Union Environmental Impact Assessment (EIA) Directive 2011/92/EU as amended by 2014/52/EU
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment. (August 2018). Department of Housing, Planning and Local Government.
- Guidelines on the Information to be contained in Environmental Impact Assessment Reports. (Draft, August 2017). Environment Protection Agency.

- Advice Notes for preparing Environmental Impact Statements. (Draft, September 2015). Environment Protection Agency
- Planning and Development Act, 2000 (as amended)
- Planning and Development Regulations 2001 (as amended)
- Interpretation of definitions of project categories of Annex I and II of the EIA Directive. (2015) European Commission
- Guidance for Consent Authorities regarding Sub-threshold Development (2003; DoEHLG).

The national requirements to provide an EIA with a planning application is outlined in *Planning and Development Act 2000 as amended* (the Act of 2000) and *Planning and Development Regulations, 2001 as amended* (the Regulations of 2001). In addition to the national legalisation there are requirements set out in the EU Directive (as referenced above); the EU Directive has been transposed into Irish Legislation through the Act 2000 the Regulations 2001.

There is a mandatory requirement for an EIA Report under Section 172(1)(a) of the Act of 2000 to accompany a planning application for some types of projects which are equal to or exceeds a limit, quantity or "threshold" set for that class of development. The mandatory thresholds for an EIA Report are set out in Schedule 5 of the Regulations of 2001.

In addition to the mandatory requirement, there is a case-by-case assessment necessary for sub-threshold developments and a requirement under Section 172(1)(b) of the Act of 2000 for an EIA to accompany a planning application for sub-threshold development which would be likely to have significant effects on the environment. In order to determine if a Project would be likely to have significant effects on the environment and if an EIA is required. Schedule 7 of the Regulations of 2001 sets out the relevant criteria to be considered by the Planning Authority.

The screening process followed in this report is in accordance with the EIA Directive 2011/92/EU of the European Parliament and of the Council as amended by 2014/52/EU and follows the format as per Section 3.2 of the Draft EPA Guidelines (August 2017). The potential for significant effects of the proposed Project has been considered against Schedule 7 of the *Planning and Development Regulations, 2001 as amended.*

In producing this report due regard has been paid to other EIA guidance including the European Union's 2017 EIA *Guidance on Screening*[1] and *Guidance on the preparation of the Environmental Impact Assessment Report*[2] as well as the published *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessm*ent[3].

It is important for the Planning Authority to note that Article 27 of the EU Directive states that "*The screening procedure should ensure that an environmental impact assessment is only required for projects likely to have significant effects on the environment*". This screening exercise is used to establish whether the proposed Project is likely to have significant effects on the environment and if an EIA Report is required.

1.2 SCREENING METHODOLOGY

The key steps to screen for an EIA is set out in Section 3.2 of the EPA Guidelines (August 2017). This EIA Screening Report has been arranged to address the information as required by these steps. These steps are:

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

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

The information required to be submitted by the developer for the Planning Authority to make a determination on EIA Screening is set out in Schedule 7A of the Regulation, Section 176A(2)(a) of the Act, and Annex IIA of the EU Directive.

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

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

1) Characteristics of proposed development (Report Section 3.0)
- *a. the size and design of the whole of the proposed development,*
- *b. cumulation with other existing development and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment,*
- *c. the nature of any associated demolition works,*
- *d. the use of natural resources, in particular land, soil, water and biodiversity,*
- *e. the production of waste,*
- *f. pollution and nuisances,*
- *g. the risk of major accidents, and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge, and*
- *h. the risks to human health (for example, due to water contamination or air pollution).*

2) Location of proposed development (Report Section 4.0)
- *a. the existing and approved land use,*
- *b. the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground,*
- *c. the absorption capacity of the natural environment, paying particular attention to the following areas:*
  - *i. wetlands, riparian areas, river mouths;*

ii. coastal zones and the marine environment;
iii. mountain and forest areas;
iv. nature reserves and parks;
v. areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive and;
vi. areas in which there has already been a failure to meet the environmental quality standards laid down in legislation of the European Union and relevant to the project, or in which it is considered that there is such a failure;
vii. densely populated areas;
viii. landscapes and sites of historical, cultural or archaeological significance.

3) Types and Characteristics of Potential Impacts (Report Section 5.0)

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

a. the magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected),
b. the nature of the impact,
c. the transboundary nature of the impact,
d. the intensity and complexity of the impact,
e. the probability of the impact,
f. the expected onset, duration, frequency and reversibility of the impact,
g. the cumulation of the impact with the impact of other existing and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment, and
h. the possibility of effectively reducing the impact.

When considering the likely impacts of the proposed development, reference should be made to *"the likely significant effects on the environment of proposed development in relation to criteria set out under paragraphs 1 and 2, with regard to the impact of the project on the factors specified in paragraph (b)(i)(I) to (V) of the definition of 'environmental impact assessment report' in section 171A of the Act"* Under Section 171A of the Planning and Development Act 2000, as amended, the effects of the proposed development on the following factors needs to be evaluated in an "environmental impact assessment":

i. population and human health;

ii. biodiversity, with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive;

iii. land, soil, water, air and climate;

iv. material assets, cultural heritage and the landscape

v. the interaction between the factors mentioned in clauses (I) to (IV)

Section 5 sets out the 'Types and Characteristics of Potential Impacts' as a result of the proposed development. The quality, magnitude and duration of potential impacts in respect of the factors above are defined in accordance with the criteria provided in the *Guidelines on Information to be Contained in Environmental Impact Assessment Reports* (EPA, 2017).

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

The main body of this report (Sections 3.0, 4.0 and 5.0) will cover Schedule 7A fully, but it has been set out to present the information under the headings provided for in Schedule 7 in order to assist the Planning Authority in its screening assessment.

1.3 CONTRIBUTORS TO THE EIA SCREENING REPORT

This EIA Screening Report and the proposed development has been informed by the accompanying documents submitted with the application (and the relevant listed mitigation measures as included therein), this screening report has been completed by AWN Consulting in conjunction with the project design team and developer, as per Table 1.1.

Table 1.1 *Project team*

Role	Contributor
Applicant	Randelswood Holdings Ltd
Architectural Design	Ha Design studio
Civil Engineering, Construction and Waste Management, Flood Risk Assessment	Lohan & Donnelly Consulting Engineers
Traffic and Transportation	Martin Rodgers Consulting Ltd. & Lohan & Donnelly Consulting Engineers
Landscape Architectural Design	Jane McCorkell Landscape Architect
Archaeological Impact Assessment	Archer Heritage Planning
Population and Human Health; Land, Soils Geology and Hydrogeology; Hydrology; Air Quality and Climate; Noise and Vibration; Material Assets and Waste Management (operational).	AWN Consulting Limited
Screening Report for Appropriate Assessment	Altemar Marine Environmental Consultant
Arboricultural Report and Associated Drawings	Charles McCorkell, Arboricultural Consultancy

This report is supported and informed by accompanying application documentation and makes an assessment on the likelihood of significant impacts to the environment after the implementation various construction and design related mitigation measures recommended. This EIA Screening Report should be read in conjunction with the plans and particulars submitted with the planning application.

Best practice mitigation measures for the proposed development during the construction and operational phases are set out in a number of documents, including the Construction Management Plan (CMP) and the Construction and Demolition Waste Management Plan (CDWMP).

This report was prepared by Liam Bruen (BSc) and Jonathan Gauntlett. Liam Bruen is a Graduate environmental consultant. Liam holds a Bachelor of Science from Technological University Dublin in Environmental Management and is a member of the ESAI. Jonathan is an Environmental Consultant in AWN Consulting with expertise in impact assessment, licensing, environmental compliance and project management. Recent projects include; EIA for SHD and planning applications, EPA Licencing and waste management. Jonathan has over 10 years' experience in environmental

compliance, environmental licensing, and urban planning. Jonathan has a BSocSc (Environmental Planning) and BBA (Economics) from the Waikato University in New Zealand and has experience working in the environmental consultancy, planning, and regulatory fields from Ireland, the UK and New Zealand.

2.0 SCREENING EVALUATION

2.1 IS THE DEVELOPMENT A PROJECT

The first step in screening is to examine whether the proposal is a *project* as understood by the EU Directive. For the purposes of the EU Directive, 'project' means:

- the execution of construction works or of other installations or schemes, or
- other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources.

The EPA Guidance (2017) states that if a proposed project is not of a type covered by the Directive, there is no statutory requirement for it to be subject to environmental impact assessment. In determining if the proposed project is of a type covered by the Directive it may be necessary to go beyond the general description of the project and to consider the component parts of the project and/or any processes arising from it.

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

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

2.2 IS THE DEVELOPMENT A PROJECT THAT REQUIRES A MANDATORY EIA

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

Ireland's type of projects for which an EIA is mandatory is set out in the Schedule 5 Part 1 and Part 2 of the Regulations. An EIA is deemed mandatory under Section 172 of the Act to accompany a planning application for development for the types of projects set out in Schedule 5. This list was developed from Annex I and Annex II of the EIA Directive. The EPA Guidance (2017) requires and assessment beyond the general description of the project and to consider the component parts of the project and/or any processes arising from it.

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

10. Infrastructure projects –

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

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

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

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

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

2.3 IS THE PROJECT ABOVE THE THRESHOLD FOR EIA

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

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

Under Class 10 (b) (i) the threshold is '*more than 500 dwelling units'. Under* Class 10 (b) (iv) the appropriate threshold is considered to be '*10 hectares in the case of other parts of a built-up area'.* The site location is not within a business district, the site is within a built-up area in Clondalkin on the outskirts of the M50 Motorway. zoned "to protect and/or improve residential amenity" under the South Dublin Council Development Plan (2016-2022).

The proposed development site is c. 0.81 ha and will comprise the construction of 130 no. dwelling units. The proposed development site not equal to nor does it exceed the limit, quantity or threshold set out in Class 10 (b)(i), or (b)(iv); therefore, an EIA is not mandatory.

2.4 CONCLUSION – SUB THRESHOLD DEVELOPMENT

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

An EIA Report is still required by Section 172 of the Act, and Schedule 5, Part 2, Class 15 of the Regulations to accompany a planning application for sub-threshold development which would be likely to have significant effects on the environment,

having regard to the criteria set out in Schedule 7. Therefore, the final step in the screening process is to consider the need for an EIA on a discretionary basis.

Article 4(4) of Directive 2014/52/EU and transposed as Schedule 7A of the Regulations, requires the developer to provide information on the characteristics of the project and its likely significant effects on the environment, to allow the competent authorities to make a determination on the requirement for an EIA.

The remainder of this report is to form the basis of the application made for sub-threshold screening for EIA under Section 176A(2)(a) and presents the information required by Schedule 7A to demonstrate the likely effects on the environment, having regard to the criteria set out in Schedule 7.

The following Sections 3.0, 4.0 and 5.0 will provide information on the characteristics of the proposed development; the location and context, and its likely impact on the environment as well as a description of any features of the project and/or measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

These sections present the information required under Schedule 7A of the Regulations, broadly set out in the structure Schedule 7 to ensure that each aspect for consideration is robustly addressed.

3.0 CHARACTERISTICS OF PROPOSED DEVELOPMENT

This section addresses the characteristics of proposed development by describing the physical characteristics of the whole proposed development and, where relevant, of demolition works; and a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected. This is to primarily to identify all areas of potential issues to explore further and assess for the likelihood of significant impacts.

3.1 SIZE AND DESIGN OF THE PROPOSED DEVELOPMENT

The proposed development is described as follows:

(i) Demolition of existing shed (15.7sq.m), sub-station (29.5sq.m) and oil tank (12.1sq.m) located in the north-eastern section of the subject site; (ii) Change of use of the existing Blocks A, B and C at Dolcain House from office use to residential use which range in height from 4-5 storeys over basement, together with modifications to the existing blocks; (iii) alterations to the existing Blocks A, B and C will include the removal of the existing fourth floor level and replacement with a new fourth floor level at Block A only, the provision of an additional floor level to all blocks with 2 no. setback floors proposed to the atrium to now provide for a height of 4-5-6 storeys to Blocks A, B and C and upgrading of the existing external fabric of the building as well as internal modifications to layouts to accommodate the proposed residential apartments; (iv) alterations to Block A to include a 5 storey extension to northern elevation; (v) alterations to Block B include the demolition of the existing single storey element on the eastern façade (73.2sq.m) which comprises a kitchen area, office and storage space, the demolition of the existing three-storey connection between Blocks B and C (23sq.m) and the relocation of the existing telecommunications mast equipment at roof level; (vi) construction of a new 6-storey Block D to the east of Block B to accommodate 29 no. apartment units. The proposed alterations and modifications to the existing Blocks A, B and C and the proposed Block D will accommodate a total of 130 no.

apartment units (comprising 61 no. one-bedroom apartments, 59 no. two-bedroom apartments and 10 no. three-bedroom apartments, as follows:-

- Block A (including atrium) will comprise 50 no. apartments (consisting of 22 no. one-bedroom apartments, 22 no. two-bedroom apartments and 6 no. three-bedroom apartments) and will range in height from 4-5 to 6 storeys over basement level;
- Block B will comprise 22 no. apartments (consisting of 9 no. one-bedroom apartments, 9 no. two-bedroom apartments and 4 no. three-bedroom apartments) and will be 5 storeys in height;
- Block C will comprise 29 no. apartments (consisting of 13 no. one-bedroom apartments, and 16 no. two-bedroom apartments) and will be 6 storeys in height; and,
- Block D will comprise 29 no. apartments (consisting of 17 no. one-bedroom apartments, and 12 no. two-bedroom apartments and will be 6 storeys in height.

The proposed development will be served by communal residential amenities/facilities at surface and basement level, including communal open space and outdoor areas at surface level; 310 no. bicycle parking spaces (254 no. at basement level and 56 no. at surface level); 78 no. car-parking spaces (62 no. at basement level and 16 no. surface level) including 5 no. car-club spaces and 3 no. accessible parking spaces and; 4 no. motorcycle parking spaces at basement level. The basement level also comprises a proposed bin storage area and plant room. The proposed development also includes landscaping, a pedestrian and cyclist access onto the adjacent Monastery Road to the north; and internal pedestrian and shared surfaces. (vii) Vehicular access to the development is proposed through the existing access/entrance to Dolcain House to the east. The application is accompanied by 2 no. site layout options, Option A and B. Option A includes a new public pedestrian footpath along the southern side of Monastery Road which extends east to the north-eastern application site boundary to facilitate a connection to future footpath. Option B provides for the omission of this footpath. (viii) Associated site and infrastructural works are also proposed which include; foul and surface water drainage; plant areas; ESB substation; and all associated site development works necessary to facilitate the proposed development.

This is not a large-scale project and the proposed design is sympathetic to the surrounding context. There are no apparent characteristics or elements of the design of the scheme that are likely to cause significant effects on the environment.

The proposed units which are dispersed throughout the existing and proposed blocks sit comfortably within the topography of the site and surroundings providing an appropriate density of development, whilst respecting the form and scale of existing built fabric on-site and within the surrounding area. In doing so, the proposal will contribute to achieving compact growth in an appropriate location within close proximity to frequent and reliable public transport services and promote consolidation in accordance with the aims and objectives as set out within the National Planning Framework (NPF) and the Regional and Economic Spatial Strategy for the Easter and Midlands Region (RSES).

The site is served by existing infrastructure including watermains, foul water sewer and utilities. Vehicular access to the development is proposed through the existing access/entrance to Dolcain House to the east from the Woodford Hill/Monastery Road roundabout.

Under current South Dublin County Development Plan 2016-2022 zoning objectives, the site is zoned under 'Objective RES, the primary objective of which is 'To protect and/or improve residential amenity'. In this regard, it is considered that the proposed development to provide for additional residential accommodation, is appropriate in the context of the sites zoning objective.

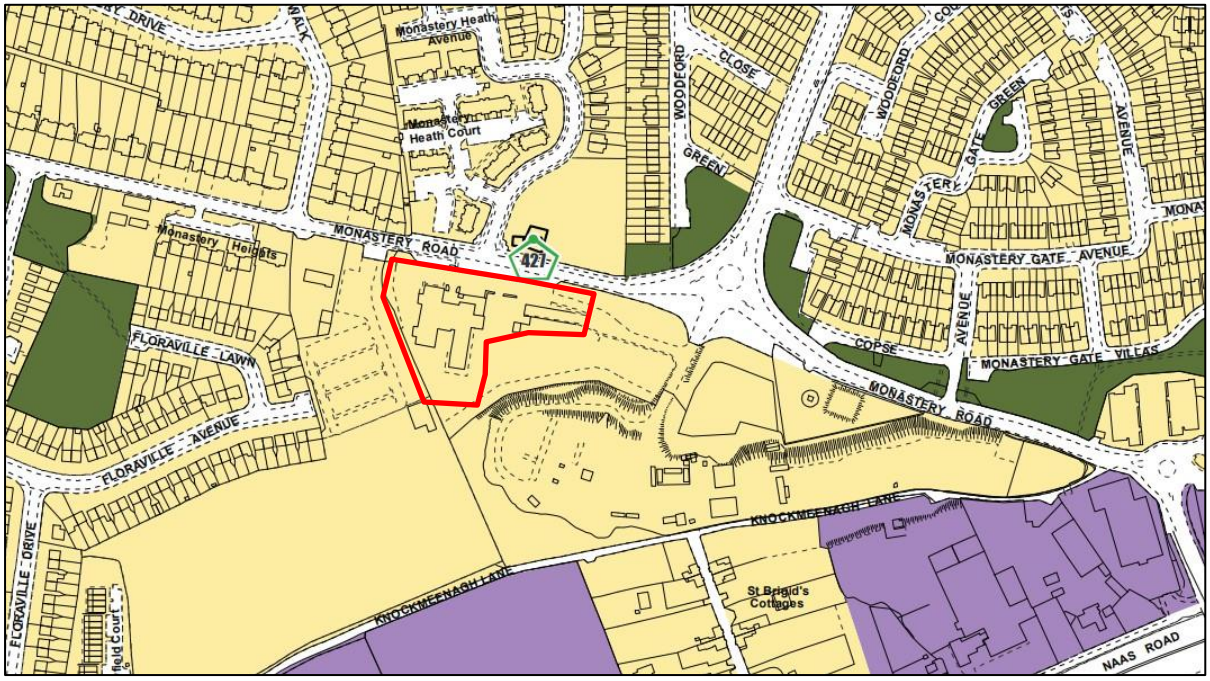

Figure 3-1 *Extract from South Dublin County Development Plan 2016-2022 Zoning Map No.5 showing the application site (outlined in red) within lands with Zoning Objective 'RES'*

Clondalkin is identified as being a Metropolitan Consolidation Zone in the South Dublin Country Development Plan (2016-2022) meaning that: *'Strong active urban places within the Metropolitan Area with strong transport links. These towns should be developed at a relatively large scale as part of the consolidation of the Metropolitan Area and to ensure that they support key public transport corridors connecting them to the City, to each other and to Large Growth Towns in the Hinterland. Long term growth could see them expanding to a population of up to 100,000 people in a planned and phased manner'*

The proposal is deemed to be compatible with its immediate adjoining land uses, which are predominantly residential. The suitability of the site for residential development is established by its land use zoning for residential with the South Dublin County Development Plan 2016-2022. In zoning the land for these uses, the Planning Authority will have thoroughly assessed the nature of the site in order to ascertain its capacity to accommodate such development. The size and design of the proposed development is not likely to cause significant effects on the environment.

A detailed description of the architectural rationale and characteristics of the proposals is provided within the Architectural Design Statement prepared by HA Design Studio. The massing and palette of materials used throughout is influenced by the nearby residential neighbourhoods; a selected brick combined with white render and stone are being used throughout the facade. Bronze metal will be adopted for balconies railings and windows. The proposed development is appropriate to the zoning and the

settlement strategy of the County Development Plan, which in turn is guided by regional and national development strategy.

The Landscape Report, prepared by Jane McCorkell Landscape Architects, provides a rationale for the landscape proposals. The landscape design of the proposed development includes the retention of the existing boundary vegetation with a provision for planting augmentation. The retention of existing trees where possible within public open space. To incorporate a selection of native trees specimens within the development to enhance the landscape character.

The application is accompanied by 2 no. site layout options, Option A and B. Option A includes a new public pedestrian footpath along the southern side of Monastery Road which extends east to the north-eastern application site boundary to facilitate a connection to future footpath. Option B provides for the omission of this footpath. The proposed Layout is shown in Figure 3.3 and Figure 3.4 below.

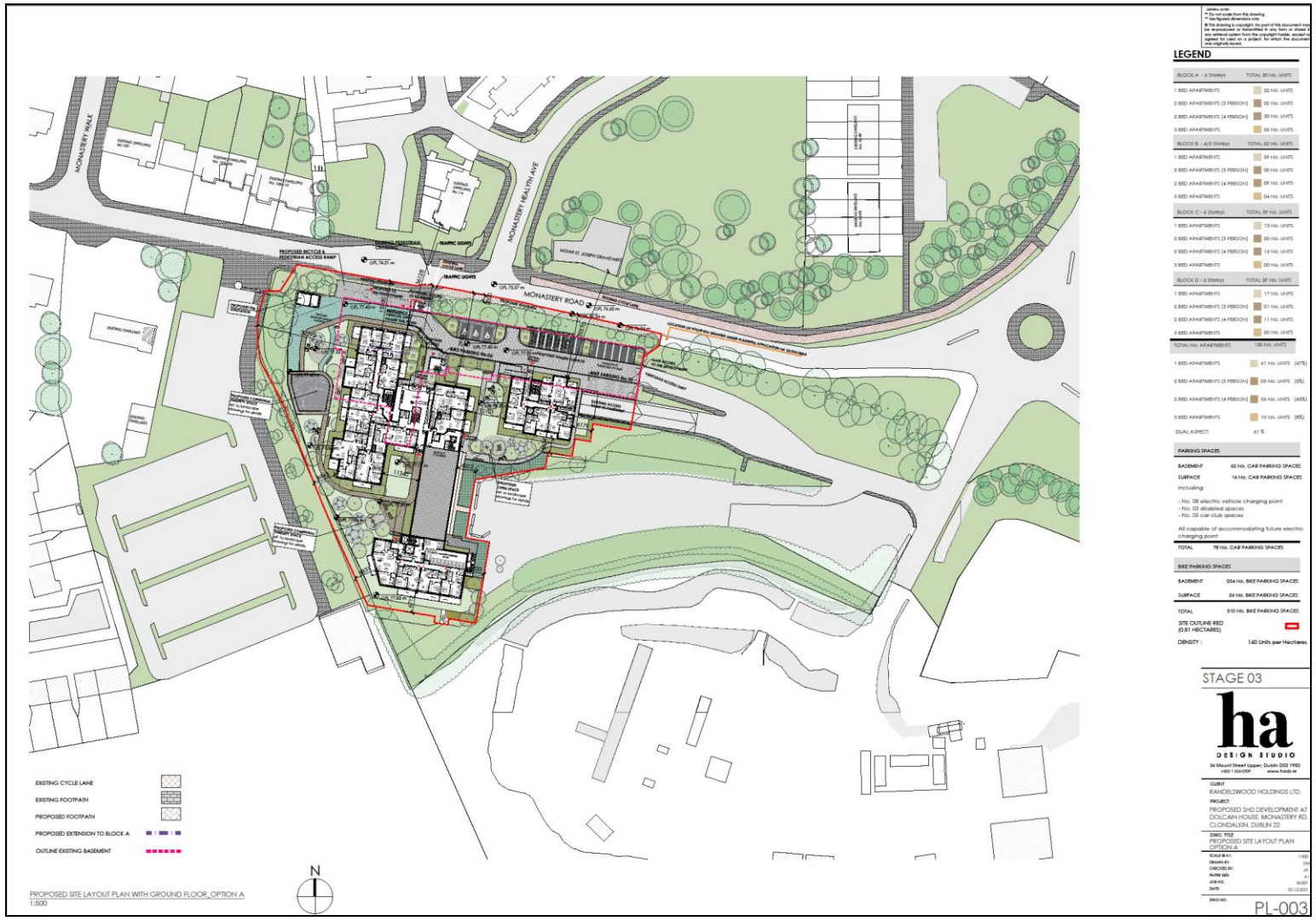

Figure 3.2 *Proposed Site Layout Plan Option A (With footpath)*

Figure 3.3 *Proposed site Layout Plan B (Without Footpath)*

3.2 CUMULATION WITH OTHER EXISTING OR PERMITTED DEVELOPMENT

This section outlines the potential cumulation with other existing or permitted development. As part of the assessment of the impact of the proposed development, account has been taken of any relevant developments that are existing, permitted, or proposed, as well as existing local land uses.

The SDCC and An Bord Pleanála (ABP) online planning search systems were consulted for the previous 5 years to generate a list of notable or applications granted permission within that period. The review of the online planning tool noted a large number of insignificant small extensions, changes of use, retention and other minor alterations in the vicinity of the proposed development. These permissions have been, where relevant, considered as a part of the overall project impact.

There are several proposed developments that were refused planning permission on the lands of the proposed development site. The following is a list of planning applications as identified on the Department of Housing, Local Government and Heritage's 'National Planning Application Map' portal

A previous application for the change of use from office use to residential use, together with extensions and modifications of the existing blocks known as Block A and Block C and associated atrium, into 86 residential units consisting of 69 one-bedroom apartments and 17 two-bedroom apartments with associated staff areas, including all associated site development and infrastructural works. Application date 16/10/2019 Reg Ref: SD19A/0324 was refused on the subject lands.

There is a permission on the adjoining lands to southeast of the site reg. ref SD10A/0064 which is permitted until November 2022 for development comprising commercial (non-retail) use (c. 24259sq.m. gfa), 6 no. retail units (c. 1764sq.m. gfa), a crèche (c. 765sq.m. gfa), a cafe/restaurant (c. 400sq.m.), a management office suite (c. 111sq.m. gfa) and 380 no. residential units.

The adjacent Round Tower GAA Club to the Southwest was approved permission in October 2018 for the construction of a single-storey building to be used for weights and fitness training. Access/agress from the proposed development is via the existing club entrance on Monastery Road, Clondalkin, Dublin 22.

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

3.3 NATURE OF ANY ASSOCIATED DEMOLITION WORKS

The demolition of the existing building facades and atrium roof structure along with the removal of the external fabrics will be the first main task of the redevelopment.

The proposed development will also require the demolition of existing shed (15.7sq.m), sub-station (29.5sq.m) and oil tank (12.1sq.m) located in the north-eastern section of the subject site.

The demolition shall be carried out in accordance with BS EN 6187:2011 Code of Practice for Full and Partial Demolition, as well as all relevant legislation, suitable Health & Safety practice.

The accompanying Outline Construction Management Plan[4] (CMP) and Outline Construction & Demolition (CDWMP) Waste Management Plan[5] prepared by Lohan & Donnelly Consulting Engineers provides details on the disposal of concrete, tiles, ceramics, glass, plasterboard, metals, timber, bricks and other waste.

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

This section describes the proposed development in terms of the use of natural resources, in particular land, soil, water, biodiversity. The proposed development will consume minimal amounts of natural resources during construction and operation.

The main use of resources will be the construction materials used which will be typical raw materials used in construction of residential developments. The scale and quantity of the materials used will not be such that would 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.

Land and Soil

The proposed land use is acceptable within the context of the existing and planned land uses and the wider residential land uses in the surrounding area. The site currently contains three existing office blocks, two of which are currently vacant. The redevelopment is an effective use of the land, due to the existing availability of critical infrastructure, such as sewage, roads, and public transportation systems.

The subject site is well suited for the proposed development, which is permissible under the zoning of the lands within the South Dublin County Council Development Plan (2016-2022).

The subject lands are brownfield. There is not likely to be significant effects on the environment with regard to soils and/or geology due to the site being connected to public foul and water services, and due to the limited amount of earthworks involved in the construction of the proposed development. There will be a requirement for deliveries of imported engineering fill, and other construction materials. Other construction activities will include site storage of aggerate, materials, fuels for construction vehicles.

The topography of the site location is such that the site falls from south to north. The southern site boundary abuts the existing SIAC quarry at an approximate level of +82.000mOD. The northern site boundary abuts Monastery Road at an approximate level of +74.500mOD. Thus there is an approximate level difference of 7.500m across the 102m width of the site, indicating an approximate average gradient of 1/13.6.

Bedrock is also known to be very close to the ground floor level towards the southern part of the site, with considerable rock excavation having been undertaken previously as part of forming the current ground level and undercroft structure.

It is expected that the majority of the surplus soil waste generated from the excavation works will be clean, inert material and should be re-used, recycled, or sent for recovery if possible. Some of this material may be suitable for reuse across the site, however, it is anticipated that the majority of the soil excavated will be removed from the site as there is limited suitable options for onsite reuse.

For further detail on the physical characteristics of the proposed development please refer to the architectural and engineering drawings, design statement and the landscape drawings which accompany this planning application.

Water Consumption

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

Domestic consumption will be the primary demand for the site and similar to other residential communities, usage for showers, toilets, cooking and gardening have been estimated. The existing water infrastructure within the area has been confirmed with Irish Water (CDS21001936) to have adequate capacity to cater for the proposed development subject to upgrade works that would be carried out by Irish Water. Approx. 130m of a new 150mm ID pipe main is required in Monastery Road to connect the Development to the existing 8''uPVC main in Woodford Hill. The applicant would fund the relevant costs for the required upgrades. There is no proposed extraction of groundwater at the site for drinking water purposes.

The use of water for construction and operational phases in relation to the proposed development is not likely to cause significant effects on the environment.

Biodiversity

Investigations into the implications on existing biodiversity including species and habitats has been undertaken through the Appropriate Assessment (AA) Screening[6] and Bat Fauna survey prepared by Altemer Environmental Consultancy included with the planning documentation. An Appropriate Assessment is an assessment of the potential effects of a proposed project or plan, on its own, or in combination with other plans or projects, on one or more Natura 2000 sites.

Ecologist Bryan Deegan of Altemer Environmental Consultancy carried out a building inspection and emergent bat survey of the Site on 17th June 2021. No evidence of bat activity was noted within the buildings. No trees of bat roosting potential are to be felled as part of the proposal. No bats were noted emerging from the buildings on site. No significant negative impacts on roosting animals are expected to result from the proposed redevelopment.

However, foraging activity within the area may be lost unless lighting is controlled. A post construction assessment of the light spill on site to ensure compliance with bat lighting guidelines will be carried out to ensure conformity with the "Bats & Lighting Guidance Notes for: Planners, engineers, architects and developers".

The accompanying AA Screening Report (Altemer, 2021) has assessed the potential for significant impacts of the construction and operational phases of the proposed development on Natura 2000 sites and habitat loss/alteration, habitat/species fragmentation, disturbance and/or displacement of species, change in population density and changes in water quality. The accompanying AA Screening Report (Altemer, 2021) concludes that;

'The prosed redevelopment project is located in a suburban environment 6.7 km from the nearest Natura 2000 site (Glenasmole Valley SAC). Watercourses and surface

runoff are seen as the main potential pathway for impacts on Natura 2000 sites. There is no direct hydrological pathway linking the proposed development site to a Natura 2000 site. There is an indirect pathway to Natura 2000 sites located within Dublin Bay via the proposed foul and surface water drainage networks.'

'No Natura 2000 sites are within the zone of influence of this development. Having taken into consideration the effluent discharge from the proposed development works, the distance between the proposed development site to designated conservation sites, lack of direct hydrological pathway or biodiversity corridor link to conservation sites and the dilution effect with other effluent and surface runoff, it is concluded that this development would not give rise to any significant effects to designated sites. The construction and operation of the proposed development will not impact on the conservation objectives of features of interest of Natura 2000 sites.'

3.5 PRODUCTION OF WASTE

Construction Phase

The accompanying Construction and Demolition Waste Management Plan (CDWMP) prepared by Lohan and Donnelly Consulting Engineers and submitted with the planning documentation; this details the methodologies employed for the control, management, monitoring and disposal of waste from the site. The CDWMP sets out the measures used is to maximise the quantity of waste recycled by providing sufficient waste recycling infrastructure, waste reduction initiatives and waste collection and waste management information. These documents provide further detail on waste and materials management methodologies for the construction phase of the proposed development.

The waste produced from the demolition of the roofs and external fabrics will be segregated by type and estimates have also been made for indicative reuse (onsite and/or offsite), recycling and disposal targets. This breakdown is shown in Table 3.1.

Table 3.1 *Predicted on and off-site reuse, recycle and disposal rates for demolition waste*

Waste Type	Tonnes	Reuse/Recovery		Recycle		Disposal	
		%	Tonnes	%	Tonnes	%	Tonnes
Glass	154.5	0.0	0.0	0.9	131.3	0.2	23.2
Concrete, Brick, tiles, Ceramics	1067.6	0.2	160.1	0.8	800.7	0.1	106.8
Plasterboard	39.5	0.0	0.0	0.9	33.6	0.2	5.9
Metals	41.5	0.1	4.2	0.9	35.3	0.1	2.1
Timber	2.0	0.1	0.2	0.6	1.2	0.3	0.6
Total	1305.1		164.5		1002.1		138.5

During the construction phase, waste will be produced from surplus materials such as timber off-cuts, broken concrete blocks, plastics, metals, bricks, tiles, etc. Waste from packaging (cardboard, plastic, timber) and oversupply of materials may also be generated. There may also be excess concrete during construction which will need to

be disposed of. The construction contractor will be required to ensure that oversupply of materials is kept to a minimum and opportunities for reuse of suitable materials is maximised.

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

Table 3.2 *Predicted on and off-site reuse, recycle and disposal rates for construction waste*

Waste Type	Tonnes	Reuse/Recovery		Recycle		Disposal	
		%	Tonnes	%	Tonnes	%	Tonnes
Concrete, Bricks, Tiles, Ceramics and Plasterboard	285.5	40	114.19	50	142.7	10	28.55
Metals	8.8	5	0.44	90	7.9	5	0.44
Other	12.7	10	1.27	40	5.1	50	6.34
Total	307		115.9		155.7		35.33

There is no known contaminated soil present on the site but in the event that the contamination is discovered during the course of construction, the excavated material will be required to be disposed of in a licensed landfill site.

It should be noted that until final materials and detailed construction methodologies have been confirmed it is difficult to predict with a high level of accuracy the construction waste that will be generated from the construction of the proposed development as the exact materials and quantities may be subject to some degree of change and variation during the construction process. However, the above estimates are considered to be the worst-case scenario.

The scale of the waste production in conjunction with the use of licensed waste disposal facilities and contractors does not cause concern for likely significant effects on the environment.

Operational Phase

The proposed development will give rise to a variety of everyday waste and recycling from the residential units during the operational phase, i.e. when the project is completed, and fully operational. The Operational Waste Management Plan[7] included with the application identifies the typical non-hazardous and hazardous wastes that will be generated at the proposed Development will include the following:

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

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

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

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

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

These measures will ensure the waste arising from the development is dealt with in compliance with the provisions of the *Waste Management Act 1996*, as amended, associated Regulations, the *Litter Pollution Act 1997* and the *EMR Waste Management Plan (2015 - 2021)*. It will also ensure optimum levels of waste reduction, reuse, recycling and recovery are achieved.

3.6 POLLUTION AND NUISANCES

There are potential short-term nuisances such as dust, noise, as well as the potential for pollution of groundwater associated with excavations and construction activities.

These construction activities shall only take place in accordance with standard construction times or permitted times as conditioned as follows: 7am – 7pm Monday to Friday; 7am – 2pm Saturdays, with no works Sundays or on Public Holidays. No activity, which would reasonably be expected to cause annoyance to residents in the vicinity will take place outside of these hours. If there is any occasion when work must be complete outside these hours advance notice will be provided to the local authority, businesses, and residents in the vicinity.

A Construction Management Plan (CMP) has been prepared by Lohan and Donnelly Consulting engineers and submitted with the planning documentation. The CMP outlines construction phase mitigation and management of Dust, Ground Water, Noise, and Erosion and sediment control of the site.

In advance of work starting on site, the works contractor will prepare a detailed Construction Environmental Management Plan (CMP). This document will set out the overarching vision of how the construction of the proposed development will be managed in a safe and organised manner by the Contractor. The CMP minimisation measures will be developed to ensure that pollution and nuisances arising from site clearance and construction activities is prevented where possible and managed in

accordance with best practice and any subsequent planning conditions relevant to the proposed development.

This CMP will be maintained by the contractors during the construction and operational phases and covers all potentially polluting activities and include an emergency response procedure. All personnel working on the site will be trained in the implementation of the procedures.

In addition to the CMP The potential for dust and noise will be managed by ensuring construction work largely operates within the approved hours of construction set out by planning conditions.

After the implementation of the measures set out in the CMP, pollution and nuisances during construction are not considered likely to have the potential to cause significant effects on the environment.

3.7 RISK OF MAJOR ACCIDENTS AND/OR DISASTERS

Landslides, Seismic Activity and Volcanic Activity

The Geological Survey Ireland (GSI) landslide database was consulted and the nearest landslide to the proposed development was c. 5 km north of the site, referred to as GSI_LS05-0006 which is occurred on the 24/12/1999 at Knockmaroon Glen Quarry, Diswellstown, Strawberry Beds, Dublin 20. There have been no recorded landslide events at the site. Due to the local topography and the underlying strata there is a negligible risk of a landslide event occurring at the site.

In Ireland, seismic activity is recorded by the Irish National Seismic Network. The Geophysics Section of the School of Cosmic Physics at the Dublin Institute for Advanced Studies (DIAS) has been recording seismic events in Ireland since 1978. The station configuration has varied over the years. Currently there are five permanent broadband seismic recording stations in Ireland and operated by DIAS. The seismic data from the stations comes into DIAS in real-time and are studied for local and regional events. Records since 1980 show that the nearest seismic activity to the proposed location was in the Irish sea (1.0 – 2.0 Ml magnitude) and to the south in the Wicklow Mountains. There is a very low risk of seismic activity to the proposed development site.

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

Flooding/Sea Level Rise

The potential risk of flooding on the site was reviewed with regard to incidences of historical, regional and local flooding relevant to the area of the subject site. A Site-Specific Flood Risk Assessment[8] has been completed for the proposed development by Lohan & Donnelly Consulting Engineers in accordance with the OPW Publication "The Planning System and Flood Risk Management Guidelines for Planning Authorities". The Site-Specific Flood Risk Assessment concluded that:

> *The proposed development of a residential apartment block would be deemed as a **highly vulnerable development** in its vulnerability classification. Review of all available flood data for the site and the surrounding area indicates the likelihood of floodwater entering to be extremely low. The site is therefore classified as a **Flood Zone C (where the probability of flooding from rivers and the sea is low - less than***

0.1% or 1 in 1000 for both river and coastal flooding) *Applying the matrix of vulnerability from the OPW Guidelines for Planning Authorities indicates that the site is therefore appropriate for the proposed development without further justification or flood alleviation measures.*

There are no recorded flood events that have has an effect on the site in question or within the surrounding area of the site.

It is therefore our opinion that the risk of flooding at this site and the risk of flooding due to the development of this site in flood events is minimal.

The report concludes the various residual flooding risk as Tidal (negligible), fluvial flooding (negligible), pluvial flooding (Low) and ground water flooding (Low).

Major Accidents/Hazards

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

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

The proposed development is not within the consultation distance of any Seveso site, nor is the proposed development a Seveso/COMAH facility. The closest SEVESO sites to the proposed development are the B.O.C Gases facility, an Upper Tier establishment located c. 2.5km northeast of the proposed development in the Bluebell industrial estate, Dublin 12. The Irish distillers Ltd. facility a Lower Tier establishment located c. 1.5 km East of the proposed development at 9 Robinhood Road, Dublin 12. And the Kayfoam Woolfson manufacturing facility a Lower tier establishment located c. 2.1 km Northeast of the proposed site in the bluebell industrial estate, Dublin 12.

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

Minor Accidents/Leaks

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

3.8 RISKS TO HUMAN HEALTH

The characteristics of the proposed development, in terms of the risks to human health (for example, due to water contamination or air pollution) have been considered. It is

expected that there will be some normal residues/emissions during the construction stage associated with the development works proposed 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. The primary potential impacts of the proposed development on human health would be noise, air (dust), or pollution of groundwater/watercourses as a result of the proposed development. Visual impact and traffic is also potential but perhaps lesser significant impacts (based on the location of the proposed development).

The proposed development is in close proximity to the M50/N7 Exit and Red Cow Luas Stop. The site is bounded on the North by Monastery Road, and to West and South by Round Tower GAA Club and pitches and on the South and East by the existing quarry and industrial complex of SIAC all at Monastery Road, Clondalkin, Dublin 12. The wider area is characterised by a variety of residential, employment, community uses.

The proposed development by way of a considered architectural approach, combined with due regard to the zoning of the site, will have a minimal impact on the local landscape amenity.

There will be no impact on local parks. It is not anticipated that the proposed development will not have any impact on local tourism or shopping amenities.

The GSI data indicates that the site does not lie within a drinking water protection area. The area is serviced by mains water supply therefore it is unlikely that any wells are used for potable water supply.

The proposed development will include an appropriately designed stormwater network that will ensure that during the operational phase the risk from diesel spills through the carparks or unloading areas is minimised. Wastewater from the proposed development will connect to mains supplies and will not have a potential impact on local amenities or the local population.

The CMP for the project will incorporate and best practice construction methodologies for the control of dust generation, traffic, and noise, as well as the management of impacts on groundwater or surface water during the construction phase.

After the implementation to mitigation any such residues and emissions, in relation to noise, air (dust), or pollution of groundwater/watercourses, are not considered likely to have potential to cause significant effects on the environment. Any impacts associated with the construction phase will be short term. Therefore, it is not anticipated that there will be any significant risks to human health.

A detailed baseline assessment for NO_2, SO_2, benzene, and PM_{10}/$PM_{2.5}$ (particulate matter <10 µm and <2.5µm) was undertaken by AWN Consulting on the site of the proposed development to ensure the works undertaken at the adjoining site of SIAC BP Construction will not impact on the air quality of the potential residents. Monitoring was conducted for a two-month period, from June 2021 – August 2021. This is included with the Air Quality Impact assessment that accompanies the planning documentation. Existing baseline levels of NO_2, SO_2, Benzene, PM_{10}, and $PM_{2.5}$ are low and are within the applicable ambient air quality standards in the region of Dolcain House, Clondalkin. It can therefore be concluded that operations at the adjoining SIAC BP site are not currently causing a deleterious impact to the local ambient air quality and are unlikely to negatively impact the air quality for potential future residents.

4.0 LOCATION AND CONTEXT OF THE PROPOSED DEVELOPMENT

This section describes the environmental sensitivity of geographical areas likely to be affected by the proposed development and, briefly describe the characteristics of the location with particular regard to the: existing and approved land use; the relative abundance, availability, quality and regenerative capacity of natural resources: and the absorption capacity of the environment.

4.1 EXISTING AND APPROVED LAND USE

The proposed development site is c. 0.81 ha in extent and is located at Dolcain House on Monastery Road, Clondalkin, Dublin 22. The proposed development site currently envelopes an existing Commercial development at Dolcain House which will be renovated and repurposed for residential use. The site is bounded on the North by Monastery Road, and to West and South by Round Tower GAA Club and pitches and on the South and East by the existing quarry and industrial complex of SIAC. The wider area is characterised by a variety of residential, employment, community uses.

The subject site is zoned 'RES' as set out in the South Dublin County Development Plan 2016-2022 the primary objective of which is 'To protect and/or improve residential amenity'. In this regard, it is considered that the proposed development which provides for additional residential accommodation, is appropriate in the context of the sites zoning objective.

Clondalkin is identified as being a Metropolitan Consolidation Zone in the South Dublin Country Development Plan (2016-2022) meaning that: *'Strong active urban places within the Metropolitan Area with strong transport links. These towns should be developed at a relatively large scale as part of the consolidation of the Metropolitan Area and to ensure that they support key public transport corridors connecting them to the City, to each other and to Large Growth Towns in the Hinterland. Long term growth could see them expanding to a population of up to 100,000 people in a planned and phased manner'*

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

4.2.1 Hydrogeology and Hydrology

Inspection of the available Geological Survey of Ireland (GSI) mapping shows that the bedrock geology underlying the site belongs to the Lucan Formation consisting of Dark limestone and shale. The bedrock aquifer underlying the proposed development according to the GSI National Draft Bedrock Aquifer Map are classified as a Locally Important gravel, productive only in Local Zones (LI). The GSI currently classifies the aquifer vulnerability in the region as High (H) and rock at or near the Surface or Karst (X).

The GSI Well Card Index is a record of wells drilled in Ireland, water supply and site investigation boreholes. It is noted that this record is not comprehensive as licensing of wells is not currently a requirement in the Republic of Ireland. This current index shows there one well within 1km of the proposed site, there are no wells located within the subject site. The area is serviced by Local Authority mains therefore it is unlikely

that any wells are used for potable supply. The site is not located near any public groundwater supplies or group schemes. There are no groundwater source protection zones in the immediate vicinity of the site.

The general vicinity of the site is part of the Dublin Groundwater Body (GWB) (EU Code: IE_EA_G_008) and is classified under the Water Framework Directive (WFD) Directive 2000/60/EC Risk Score system (EPA, 2021) as "*not at risk"* meaning the GWB has achieved its objectives and has either no significant trends or improving trends. The Dublin GWB was given a classification of "*Good"* for the last WFD cycle (2013-2018).

There are no waterbodies within the Site of the Proposed Development. The closest surface water features to the Proposed Development Site are recorded on the GSI database (GSI, 2021) and the EPA database. The Camac River is the closest water feature to the development site. One of its tributaries the Ballymount stream holds the same river waterbody code as the Camac River (River Waterbody Code: IE_EA_09C020500) and is located 750 m south of the proposed development and flows c. 2km in a north easterly direction before joining the Camac River directly. The Camac River (Waterbody code: IE_EA_09C020500), flows in a north easterly direction c. 900m north of the proposed site before it's confluence with the Ballymount stream. The Camac River is listed as a WFD status as 'at risk' with 'Poor' Ecological Status under the 2013-2018 monitoring. The Camac River flows into the Liffey River which reaches Dublin at Liffey Estuary Lower.

The most recent surface water quality data for the Liffey Estuary Upper and Dublin Bay (2019-2020) indicate that they are 'Unpolluted'. Under the 2015 'Trophic Status Assessment Scheme' classification of the EPA, 'Unpolluted' means there have been no breaches of the EPA's threshold values for nutrient enrichment, accelerated plant growth, or disturbance of the level of dissolved oxygen normally present.

There are no sensitive soil receptors, or groundwater supplies in the vicinity of the site boundary. There are no identified areas of geological heritage areas within the site boundary. The closest audited geological heritage sites are Belgard quarry c. 2km southwest of the proposed development and the Greenhills Esker c. 2.3 km southeast of the proposed site.

The scale of natural resources used both in construction and operation is not such it is likely to cause concern in terms of significant likely effects on the environment. There will be no significant loss of soil, land, or water. Given the distance to the areas and low risk of significant effects to the Camac River, the environmental sensitivity and absorption capacity of coastal zones, the marine environment is unlikely to be impacted.

4.2.2 Biodiversity and Areas of Conservation

The Appropriate assessment (AA) screening report identified five Special Areas of Conservation (SACs) and three Special Protection Areas (SPAs) within the zone of influence of the proposed development. These sites are outlined in the Table 4.1 below.

Table 4.1 *European Sites located within 15km*

Site Code	Site Name	Distance (km)[1]
Special Areas of Conservation (SAC)		
001209	Glenasmole Valley SAC	6.7
001398	Rye Water Valley/Carton SAC	8.6
002122	Wicklow Mountains SAC	9
000210	South Dublin Bay SAC	11.2
000206	North Dublin Bay SAC	14
Special Protected Areas (SPA)		
004040	Wicklow Mountains SPA	10.4
004024	South Dublin Bay and River Tolka Estuary SPA	11
004006	North Bull Island SPA	14

The potential ecological impacts of proposed development have been considered in terms of the sensitivity of the location through the Altemar Appropriate Assessment Screening Report included with the planning documentation.

> *"There are no Natura 2000 sites downstream of the proposed development prior to reaching the Natura 2000 sites within estuarine waters of Dublin Bay. Water from the site would enter a tributary of the River Camac, the River Camac itself, and finally outfall to the estuarine element of the River Liffey. As a result of the surface water connection to public networks, the proposed development is not directly hydrologically linked to a Natura 2000 site. The pathway to the Natura 2000 sites in Dublin Bay is deemed to be an indirect pathway. Due to the significant distance (>10km), dilution and settlement within the River Camac and River Liffey and mixing within the estuarine environment of the River Liffey, no significant effects are foreseen. There is no direct or indirect hydrological pathway from the proposed development site to the Natura 2000 sites beyond 15km and no impact is foreseen on these sites"*

The proposed development will be connected to public foul systems and as such there will be no discharges to watercourses in this regard.

4.3 ABSORPTION CAPACITY OF THE NATURAL ENVIRONMENT

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

The development site is not located within or adjoining an Architectural or General Conservation Area; is not located within or adjoining a Native Woodland Trust; and is not covered by protected views, scenic routes or viewpoints.

The proposed development will be connected to public foul systems and as such there will be no discharges to watercourses in this regard. Lohan & Donnelly consulting

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

engineers propose to discharge surface water to the existing surface water sewer on Monastery Road.

The environmental sensitivity of the proposed location in respect of Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive has been addressed in the AA Screening Report.

The proposed land use is compatible with the zoning provision and existing development and uses in the vicinity. Therefore, there are no anticipated likely significant effects on the environment in relation to the geographic location of densely populated areas.

There are no recorded monuments or Areas of Archaeological Potential located within the application area, however a number of recorded monument and places (14 within c. 1km radius) show the overall landscape around Clondalkin village to have archaeological significance. The site is located c. 0.5km southeast of the Area of Archaeological Potential of Clondalkin town as noted in the South Dublin County Council Development Plan 2016-2022 map.

An Archaeological Impact Assessment prepared by Archer Heritage Planning concludes that previous development of the site means that it has been extensively disturbed. The potential that buried archaeological remains survive at the site is therefore low.

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

5.0 TYPES AND CHARACTERISTICS OF POTENTIAL IMPACTS

This section sets out the likely significant effects on the environment of proposed development in relation to criteria set out under paragraphs 1 and 2 (as set out in Sections 4 and 5 above), with regard to the impact of the project on the factors specified in paragraph (b)(i)(I) to (v) of the definition of 'environmental impact assessment report' in section 171A of the Act (as amended).

The quality, magnitude and duration of potential impacts are defined in accordance with the criteria provided in the *Guidelines on Information to be Contained in Environmental Impact Assessment Reports* (EPA, 2017).

5.1 POPULATION AND HUMAN HEALTH

European Commission guidance relating to the implementation of the 2014 Directive, in reference to "human health" states "Human health is a very broad factor that would be highly Project dependent. The notion of human health should be considered in the context of other factors in Article 3(1) of the EIA Directive and thus environmentally related health issues (such as health effects caused by the release of toxic substances to the environment, health risks arising from major hazards associated with the Project, effects caused by changes in disease vectors caused by the Project, changes in living conditions, effects on vulnerable groups, exposure to traffic noise or air pollutants) are obvious aspects to study". [9]

The Draft EPA Guidelines on the information to be contained in environmental impact assessment reports state that 'in an EIAR, the assessment of impacts on population

and human health should refer to the assessments of those factors under which human health effects might occur, as addressed elsewhere in the EIAR e.g. under the environmental factors of air, water, soil etc'.[10]

5.1.1 Construction Phase

The potential impacts of the proposed development on population human health and populations would be nuisances such increased air pollution (dust), noise, traffic, and visual impact construction and demolitions phase. There is no significant risk of pollution of soil, groundwater or watercourses associated with the proposed development.

The CMP sets out requirements and standards in relation to construction noise, traffic, and dust generation that must be met during the construction stage and any subsequent planning conditions relevant to the proposed development. The accompanying outline CMP prepared by Lohan & Donnelly consulting engineers notes that development will be undertaken in accordance with current European and British industrial standards, with all mitigation and safety measures put in place to ensure a responsibly managed construction process.

The proposed development is likely to have a positive direct effect on local employment and economic activity, particularly in the construction sector. The construction phase will also have positive indirect effects on employment and economic activity in associated and secondary building services industries, e.g. quarrying, building supplies, retail and technical professions.

The potential impact of the proposed development with respect to populations human health during the construction phase is ***negative***, ***not significant*** and ***short-term***.

5.1.2 Operational Phase

Once completed, the proposed development will deliver 130 no. residential units, including communal amenity spaces and facilities. The proposed residential units, once available, will reduce pressure on the existing market in the area. A high standard of living which will be beneficial for the wellbeing of the future inhabitants which will result from the layout/quality of the proposed units, the large open space areas and the ancillary services provided on site.

More broadly, the resultant increase in population will assist with the delivery of critical mass to support a wider range of businesses, services, public transport and employment opportunities in the area. No significant adverse cumulative effects on population and human health are anticipated during the construction or operational phases of this development.

There are no planned direct discharges to water or land, although the risk of accidental discharge or spills exists. A number of design measures will be adopted to prevent the contamination of groundwater during the operational phase; as described in Section 5.2. The proposed development will not result in any off-site exceedance of the relevant ambient air quality standards. The proposed development is not a noise sensitive use.

The design of the proposed development has due regard of the sensitivity of the surroundings. Landscape and Visual impacts are discussed further in Section 5.7.

The Flood Risk Assessment by Lohan & Donnelly Consulting Engineers concludes that the proposed development is categorised as Flood Zone C. The report concludes the

various residual flooding risk as Tidal (negligible), fluvial flooding (negligible), pluvial flooding (Low) and ground water (Low. There is no likelihood of significant effects on human health from the proposed development as a consequence of flooding.

There are no operational impacts that would be likely to cause significant effects on the environment in terms of population and human health.

The potential impact of the proposed development with respect to populations and human health during the operational phase is ***neutral***, ***not significant*** and ***long-term***. There are no likely significant effects in terms of the populations and human health as during the operational phase

5.2 LAND, SOILS, GEOLOGY, HYDROGEOLOGY, AND HYDROLOGY

5.2.1 Construction Phase

Excavations, Soil handling, Removal and Compaction

Site preparation, excavations and levelling works required to facilitate construction of foundations, access roads and the installation of services will require excavation of material. This will result in a permanent relocation of soil and subsoil at most excavation locations. Excavated overburden material will be reused on site for landscaping.

Any material, which is exported from site, if not correctly managed or handled, could impact negatively on human beings (onsite and offsite) as well as water and soil environments. Any nearby sites requiring clean fill/capping material will be contacted to investigate reuse opportunities for clean and inert material. If any of the material is to be reused on another site as a by-product (and not as a waste), this will be done in accordance with Article 27. Similarly, if any soils/stones are imported onto the site from another construction site as a by-product, this will also be done in accordance with Article 27.

Site investigations are set to be carried out prior to the demolition works to determine the classification of the soil to be excavated in accordance with the *European Communities (EC) Council Decision 2003/33/EC* which establishes the criteria for disposal of waste at landfill. It is recommended that soil samples are taken during the site investigations for analysis against Waste Acceptance Criteria (WAC).

It is expected that the majority of the surplus soil waste generated from the excavation works will be clean, inert material and should be re-used, recycled, or sent for recovery if possible. All excavated materials will be visually assessed for signs of possible contamination such as staining or strong odours. Should any unusual staining or odour be noticed, samples of this soil will be analysed for the presence of possible contaminants in order to ensure that historical pollution of the soil has not occurred. Should it be determined that any of the soil excavated is contaminated, this will be disposed of by a licensed waste disposal contractor.

Stockpiles have the potential to cause negative impacts on air and water quality. The effects of soil stripping and stockpiling will be mitigated against through the implementation of appropriate earthworks handling protocol during construction. It is anticipated that any stockpiles will be formed within the boundary of the site and there will be no direct link or pathway from this area to any surface water body. Overburden

material will be protected from exposure to wind by storing the material in sheltered parts of the site, where possible.

Accidental Spills and Leaks

As with all construction projects there is potential for soil, subsoils, and ground water, to become contaminated during the construction phase of the scheme from a number of potential sources of contamination that will be present on-site, such as fuel storage / leakage and other chemicals (paints / detergents). Contaminated water which arises from construction sites can pose a significant short-term risk to groundwater quality for the duration of the construction if contaminated water is allowed percolate to the aquifer or accidental discharges to surface water.

Accidental spillages which are not mitigated may result in localised contamination of soils and groundwater underlying the site, should contaminants migrate through the subsoil's and impact the underlying groundwater.

These potential impacts during the construction phase are required to be mitigated by ensuring best practice construction with respect to storage of any hazardous substances that may pose a risk to the environment. The project specific CMP sets out best practice construction methodology to manage the risk of accidental spills and leaks.

Dewatering, Run-off and Sediment Loading

The proposed development is unlikely to require any significant dewatering therefore no alteration to the natural hydrogeological regime. There is the potential for surface water run-off from site preparation, levelling, landscape contouring and excavations during the construction phase may contain increased silt levels or become polluted from construction activities. Run-off containing large amounts of silt can cause damage to surface water systems and receiving watercourses. The main risk of silty water can arise from surface water runoff from excavations, exposed ground, soil stockpiles, and access roads.

Where dewatering is required during the construction phase, dirty water will be fully and appropriately attenuated, through silt bags, before being appropriately discharged to foul sewer with agreement of Irish Water and of Authority.

Foul Water and Potable Water

Welfare facilities will be provided for the contractors on site during the construction works. During construction, portable sanitary facilities will be provided with waste collected and disposed of appropriately. There are no predicted adverse impacts on wastewater during construction.

The proposed development will be connected to the public foul and water services. There are no planned discharge to ground, or groundwater result abstraction for the proposed development.

A pre-connection enquiry (for foul sewer and potable water) was sent to Irish Water in April/May 2021 for the subject site which includes 130 No. residential units. Irish Water confirmed that subject to a valid connection agreement, the proposed connection can be facilitated (Ref: CDS21001936).

The foul discharge from the site will join the public sewer and will be treated at the Irish Water Ringsend Wastewater Treatment Plant. This WWTP is required to operate under an EPA licence and meet environmental legislative requirements as set out its licence. During operation the site will operate in compliance with the requirements of an Irish Water (IW) licence for discharge to sewer.

There are no likely significant effects in respect of foul water and potable water demand from the site.

Mitigation measures and overall impact

The project specific CMP will set out best practice construction methodology in order to mitigate the potential impacts on Land, Soils, Geology, Hydrogeology, and Hydrology. The mitigation measures proposed will include, at minimum, the measures set out in the CMP and any planning conditions. The detailed CMP will be formulated in accordance with best international practice including but not limited to:

- CIRIA, (2001), Control of Water Pollution from Construction Sites, Guidance for Consultants and Contractors,
- Construction Industry Research and Information Association (CIRIA) Environmental Good Practice on Site (C650), 2005,
- BPGCS005, Oil Storage Guidelines,
- CIRIA 697, The SUDS Manual, 2007,
- UK Pollution Prevention Guidelines (PPG) UK Environment Agency, 2004,
- Construction Industry Research and Information Association CIRIA C648: Control of water pollution from linear construction projects: Technical guidance (Murnane et al. 2006),
- CIRIA C648: Control of water pollution from linear construction projects: Site guide (Murnane et al. 2006), and
- Inland Fisheries Ireland (2016). Guidelines on Protection of Fisheries during Construction Works in and Adjacent to Waters.

After the implementation of appropriate mitigation measures, including the guidance above, the predicted impact on land, soils, geology, hydrogeology, and hydrology during construction is considered to be ***negative, imperceptible*** and ***short-term***. There are no likely significant effects in terms of the land, soils, geology, hydrogeology, and hydrology during the construction phase.

5.2.2 Operational Phase

Direct and Indirect Discharges Management

Surface water runoff from roads and car parking areas can potentially contain elevated levels of contaminants such as hydrocarbons and suspended solids. Any accidental emissions of oil, petrol or diesel could cause contamination if the emissions enter the water environment unmitigated.

Surface water will be attenuated and on site prior to controlled release to the surface water sewer on Monastery Road. Flow from the site shall be restricted by a proprietary flow control device located downstream of the attenuation system.

The proposed development has been designed in order to comply with the Greater Dublin Drainage Study (GDDS), as well as other relevant guidance. The proposed SuDS (Sustainable Drainage Systems) method of water disposal at the site will ensure

that no negative impacts to surface water or stormwater leaving the site will arise due to the attenuation measures planned, with the proposal improving the water environment at the location.

The disposal of foul water from the site is separated from that of surface water and Irish Water have confirmed a connection is feasible. Foul water from the proposed development will flow to the Ringsend Wastewater Treatment Plant via the public sewer system.

There is an indirect hydrological pathway from the site to the South Dublin Bay SAC, North Dublin Bay SAC, South Dublin Bay and River Tolka SPA, and North Bull Island SPA via the proposed discharge of surface water into the existing public surface water drainage network on Monastery Road. This network then outfalls to the River Camac, a watercourse that feeds into the River Liffey. As can be seen from the EPA Water Framework Directive (WFD) data in Figure 12, the River Camac is located in close proximity to the proposed development (<1km). All foul wastewater drainage from the site will be connected to an existing public sewage system and treated at Ringsend Wastewater Treatment Plant.

Mitigation measures and overall impact

The implementation of mitigation through design, the incorporation of SuDs drainage system will ensure the development will not give rise to any significant water quality impacts at or downstream of the site.

The attenuation system shall incorporate a Stormtech isolator row which is lined internally with a geotextile membrane and through which all incoming surface water must pass through. This allows for the removal of silts and suspended solids, thus improving water quality flowing into the public surface water drainage network.

In consideration through appropriate design outlined in the Engineering Service Report the predicted impact on land, soils, geology, hydrogeology, and hydrology during operation is considered to be ***negative, imperceptible*** and ***long term.*** There are no likely significant effects in terms of land, soils, geology, hydrogeology, and hydrology.

5.3 BIODIVERSITY

5.3.1 Construction Phase

The potential impact from the proposed development on biodiversity with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive has been considered as a part of the Appropriate assessment (AA) Screening provided with the planning documentation.

The site is currently occupied by 3 no. underutilized office blocks. There are no notable areas of woodland, with some trees and low-level scrub lining the perimeter. The AA Screening Report for the site has confirmed that the site is not under any wildlife or conservation designation. Furthermore, no rare, threatened or legally protected species are known to occur on the site.

Ecologist Bryan Deegan of Altemer Environmental Consultancy carried out a building inspection and emergent bat survey of the Site on 17th June 2021. No evidence of bat activity was noted within the buildings. No trees of bat roosting potential are to be felled as part of the proposal. No bats were noted emerging from the buildings on site. No

significant negative impacts on roosting animals are expected to result from the proposed redevelopment.

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

The mitigation measures will following best practice guidelines to ensure that water bodies are adequately protected during construction work discussed in Section 5.2.1 above. With the implementation of the mitigation measures proposed, the proposed development will not adversely affect (either directly or indirectly) the integrity any European site, either alone or in-combination with other plans or projects.

On the basis of the above with regard to the evidence set out within the AA Screening Report the potential effects on local biodiversity and ecology are ***neutral***, ***imperceptible,*** and ***short term*** for the construction phase. There are no likely significant effects in terms of biodiversity and ecology.

5.3.2 Operational Phase

The accompanying AA Screening Report by Altemar Environmental consultancy has assessed the potential for significant impacts of the operational phases of the proposed development on Natura 2000 sites and habitat loss/alteration, habitat/species fragmentation, disturbance and/or displacement of species, change in population density and changes in water quality.

The proposed development is designed to create a high-quality landscape that will protect and enhance the biodiversity value and ecological function of the green infrastructure network whilst creating an attractive landscape for residents to engage with and enjoy. The design approach will repair habitat fragment and provide for regeneration of flora and fauna where existing landscape lacks and has become overmature. Incorporating appropriate elements of green infrastructure, new tree planting, woodland augmentation planting, and mixed ornamental planting in areas of hard landscape, thus reducing the amount of hardscape.

A post construction assessment of the light spill on site to ensure compliance with bat lighting guidelines will be carried out to ensure conformity with the “Bats & Lighting Guidance Notes for: Planners, engineers, architects and developers”.

On the basis of the above with regard to the evidence set out within the AA Screening Report the potential effects on local biodiversity and ecology are ***positive***, ***slight,*** and ***long term*** for the operational phase. There are no likely significant effects in terms of biodiversity and ecology.

5.4 AIR QUALITY

5.4.1 Construction Phase

Due to the low volume of construction stage traffic associated with the proposed project, there is no potential for significant impacts to air quality. Impacts to air quality are considered localised, ***short-term***, and ***imperceptible***.

There is potential for degradation of the air quality (dust) in a very localised area during certain parts of the construction process. The concern from a health perspective is focussed on particles of dust which are less than 10 microns (PM10) and less than 2.5

microns (PM2.5). With regards to larger dust particles that can give rise to nuisance dust, there are no statutory guidelines regarding the maximum dust deposition levels that may be generated during the construction phase of a development in Ireland.

The CMP will set out minimisation measures to ensure nuisance dust arising from demolition, site clearance and construction activities is prevented where possible and managed in accordance with best practice and any subsequent planning conditions relevant to the proposed development.

There is low potential for fugitive dust generation during construction due to the low sensitivity of the receiving environment and scale of the proposed works. The predicted impact of the construction works on air quality as a result of dust emissions will therefore be ***short-term*** and ***imperceptible***.

On the basis of the above the potential effects on Air Quality are ***negative***, ***imperceptible,*** and ***short term*** for the construction phase. There are no likely significant effects in terms of Air Quality.

5.4.2 Operational Phase

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

With reference to the Air Quality Impact assessment that accompanies the planning documentation; and as detailed in Section 3.8, existing baseline levels of NO_2, SO_2, Benzene, PM_{10}, and $PM_{2.5}$ are low and are within the applicable ambient air quality standards in the region of the proposed development following monitoring of baseline levels. It can therefore be concluded that operations at the adjoining SIAC BP site are not currently causing a deleterious impact to the local ambient air quality and are unlikely to negatively impact the air quality for potential future residents.

On the basis of the above the potential effects on Air Quality are ***neutral***, ***imperceptible,*** and ***long term*** for the operational phase. There are no likely significant effects in terms of Air Quality.

5.5 NOISE AND VIBRATION

5.5.1 Construction Phase

During the construction phase it is expected that there will be some temporary impact on the nearest residential properties due to noise emissions from the plant equipment required for construction.

During demolition and construction, all contractors and activities on site shall comply with BS 5228-1:2009 “Code of Practice for Noise and Vibration control on Construction and Open Sites – Part 1: Noise” (or any further limits imposed by SDCC’s Environmental Health Department).

Where appropriate, contractors will ensure adequate noise monitoring is in place at all appropriate times and that records will be kept and made available for inspection.

The CMP will set out minimisation measures to ensure nuisance noise arising from demolition, site clearance and construction activities is prevented where possible and

managed in accordance with the above and any subsequent planning conditions relevant to the proposed development.

The potential effects as a result of noise and vibration are ***negative***, ***not significant,*** and ***short term*** for the construction phase. There are no likely significant effects in terms of Noise and Vibration.

5.5.2 Operational Phase

The operation of the proposed development will remain consistent with the type of activity and buildings the vicinity of the proposed development site. The proposed development will be subject to compliance with any relevant noise criteria outlined in any relative planning conditions.

The potential effects on noise and vibration are ***neutral***, ***imperceptible***, and ***long term*** for the operational phase. There are no likely significant effects in terms of Noise and Vibration.

5.6 LANDSCAPE AND VISUAL IMPACT

5.6.1 Construction Phase

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

The predicted impact on landscape and visual impact during construction will be short term and will range from ***slight to moderate*** and ***neutral to negative***. There are no likely significant effects in terms of the Landscape and Visual Impact during construction.

5.6.2 Operational Phase

The operational phase will give rise to a noticeable positive change in the landscape character. The initial impact of the built development on the landscape character would be perceived as positive due to the change in type from a disused commercial facility to a well landscaped and cladded residential development.

The proposed development is consistent with the land use zoning designation and with the wider established residential setting and will not give rise to any significant landscape and visual effects.

The proposed development will contribute positively to the nature of the landscape and streetscape in the Monastery Road area and significantly enhance the setting and appearance of the site as well as the public realm.

The site makes a positive contribution to the legibility of the wider suburban area as it provides a new public pedestrian footpath which connects the subject site with the surrounding public footpath network in turn allowing for a greater degree of connectivity and permeability, improving future links to public transport networks. The proposed scheme is designed to a high architectural standard and would create a place of interest within the neighbourhood locality. The proposed scheme also addresses the

Monastery Road Frontage in a positive manner, introducing increased activation at street level.

A Landscape Design has been developed by Jane McCorkell Landscape Architects (JMLA) which aims to create a high-quality landscape that will protect and enhancing the biodiversity value and ecological function of the green infrastructure network whilst creating an attractive landscape for residents to engage with and enjoy. The design approach will repair habitat fragment and provide for regeneration of flora and fauna where existing landscape lacks and has become overmature. Incorporating appropriate elements of green infrastructure, new tree planting, woodland augmentation planting, and mixed ornamental planting in areas of hard landscape, thus reducing the amount of hardscape.

Overall landscape and visual impacts post development will be ***moderate, neutral,*** and ***long-term***. There are no likely significant effects in terms of the Landscape and Visual Impact during operation.

5.7 CULTURAL HERITAGE, AND ARCHAEOLOGY

5.7.1 Construction Phase

A review of the Heritage Council's online database (https://heritagemaps.ie/) determined that there are no recorded archaeological sites or monuments within the proposed development lands. The application site is not located within an area or zone of archaeological significance as identified by the Dublin City Development Plan 2016-2022. There are no features of cultural heritage on or adjacent to the site. In this regard, any impacts upon cultural heritage are considered to be neutral, imperceptible and long term in nature. There are no recorded archaeological sites or monuments within the proposed development lands, as listed in the Record of Monuments and Places.

Archer Heritage Planning Ltd. have prepared an Archaeological Impact Assessment of the site. There are no recorded monuments or Places (RMP) of Archaeological Potential located within the application area. There are 14 RMP sites within c.1km radius of the subject site. The closest RMP site to the proposed development is a possible levelled ringfort (DU017-043; Enclosure; Knockmitten) located c. 400m to the north.

There were no previous archaeological excavations within the site. There are a number of excavations within the wider area around the site. These include numerous excavations centred on the early church site, including excavation of an 11th Century church situated within an enclosure (Rynne 1967). At Monastery Road, two previous excavations have been undertaken. Test excavation and monitoring at the site of a car park (E003992; M McQuade) and monitoring of S.I. trenches (E004754; M Byrne) both recorded no sites of archaeological significance.

The Archaeological Assessment Report concluded that;

"The subject site is located in an area of archaeological potential. However, previous development of the site means that it has been extensively disturbed. The potential that buried archaeological remains survive at the site is therefore low. Development proposals may, however, include additional groundworks consisting of extension(s) the existing building, services provision and soft and hard landscaping."

The construction phase of the development, due to its temporary nature, does not give rise to any impact on cultural heritage. As the site has been previously developed it is

extremely unlikely that the proposed developed will uncover potential as yet unknown sub-surface archaeological features on the site. The ground works on site would including monitoring during construction would require monitoring by a suitable qualified archaeologist, as recommended Archer Heritage Planning Ltd.

With the implementation of mitigation, there are no likely significant effects in terms of the Cultural Heritage during construction.

5.7.2 Operational Phase

There will be no impacts on the archaeological heritage in the receiving environment during the operational phase of the proposed development.

It is concluded that the proposed development will not have a significant effect on archaeology or cultural heritage and the proposed Project would not warrant preparation of an EIA on cultural heritage grounds.

5.8 MATERIAL ASSETS; INCLUDING TRAFFIC AND WASTE

5.8.1 Construction Phase

Utilities: Foul Sewer, Stormwater and Potable Water

The proposed development will have an impact upon other material assets such as 'built services and infrastructure' (set out in the draft EPA Guidelines 2017) such as electricity, telecommunications, gas and water supply. The likely impact is considered to be consistent with the site's zoning objective as set out in the City Development Plan and typical of a development at an urban location. Pre-request consultation with Irish Water has confirmed that a connection to existing networks is feasible with Irish Water, as set out in the accompanying Engineering Services Report by Lohan & Donnelly.

Welfare facilities will be provided for the contractors via portable sanitary facilities within the construction compound site during the construction works. It is expected in the early phases of construction wastewater generated at the welfare facilities in the construction compound will be managed by means of a temporary sealed storage tanks, with all wastewaters being tankered off-site to an appropriately licensed facility for disposal. In the later stages a temporary connection to the existing foul sewer network may be established with agreement with Irish Water.

During construction, a temporary connection will be required for welfare facilities, dust suppression and general construction activities. If a temporary connections is required this will be subject to relevant applications and approvals. The water demand during the construction phase will not be significant enough to affect existing pressures.

Specific measures to protect ground water generally, and specifically the Stradbrook Stream, during the construction works on site will be put in place under the control of the site Environmental Consultant. During bulk excavation stage, it is envisaged runoff from the site shall be controlled via temporary site drainage systems and directed to central catchpits. Runoff shall be pumped to a series of settlement tanks designed to reduce suspended solids to limits deemed acceptable by SDCC prior to discharge to surface water sewers at a rate agreed with SDCC. No runoff shall be permitted to enter Stradbrook Stream or any other water body at any point during the proposed works.

The power and electrical supply requirements during construction are relatively minor, and there is no potential impact anticipated on existing users.

Traffic and Transportation

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

It is unlikely that certain elements of the construction work will interface with the present usage of Monastery Road, however, measures outlined in the CMP are proposed to mitigate the risk of traffic congestion, such as;

- A well planned 'just in-time' deliveries and logistics schedule to minimise the need for large areas of site storage of building elements.
- The delivery schedule is planned to avoid morning and evening peak hours.
- As much off-site prefabrication works as is practical will be carries out in order to reduce the requirement for on-site work packages.
- Consultation with neighbours to take place in advance of the works and where appropriate certain local agreements may be entered into.
- The contractor will draw up a detailed TMP for the agreement with SDCC using this plan as a baseline.

The potential effects on Traffic and Transportation are ***negative***, ***not significant***, and ***short term*** for the construction phase. There are no likely significant effects in terms of Traffic and Transportation, and it would not warrant preparation of an EIA on these grounds.

Waste and Waste Management

Other than materials necessary for the construction of the building the proposed development will not produce significant volumes of waste. All waste arising during the construction phase will be managed and disposed of in a way that ensures the provisions of the Waste Management Act 1996 and associated amendments and regulations and the Waste Management Plan. In the event, there is excess material with no defined purpose, it will be transported to an authorised soil recovery site.

Waste during construction will be managed in accordance with a project specific Construction and Waste Management Plan.

It is considered that the proposed development will not have any significant impact in terms of resources or waste generation.

A carefully planned approach to waste management as set out in Section 3.5 will ensure that the impact on the environment will be ***short-term, neutral*** and ***imperceptible***.

Conclusion

There are no likely significant environmental effects in terms of the material assets, for the proposed development and considering the existing environment and proposed future environment which would warrant preparation of an EIA.

5.8.2 Operational Phase

Utilities: Foul Sewer, Stormwater and Potable Water

Wastewater generated from the 3 existing blocks shall enter an underground foul sewer system, while the wastewater generated from the new block shall enter an underslung foul sewer system, suspended below ground floor slab and exit the site via gravity flow.

The site is currently served by a 150mm diameter foul water sewer spur which discharges to the existing 225mm diameter public foul water sewer on the near side of Monastery Road via an existing connection to an existing manhole. This outfall manhole will be retained with additional drainage from a new block added to the drainage system on site. It is proposed to keep the existing 150mm diameter foul sewer at a gradient of 1/100 to serve the new development, which provides a flow capacity of 16.5 litres/second exceeding the 6DWF of 3.928 litres/second. The number of units discharging into the sewer would be sufficient for the sewer to achieve self-cleansing velocity at the proposed gradient. The sewer ultimately drains to the Ringsend Wastewater Treatment plant at Pidgeon House Road, Dublin 4.

It is proposed to maintain and reuse the existing water connection onsite to service the new 130-unit development.

A pre-connection enquiry application (for foul sewer and potable water) has been made to Irish Water detailing the proposed wastewater discharges and proposed water uses for the subject site which includes 130 no. residential units. Reference number CDS21001936 has been allocated for the application and a confirmation of feasibility letter has been issued by Irish Water in relation to the proposed development.

A surface water network designed in accordance with Greater Dublin Strategic Drainage Study (GDSDS) and in the CIRIA SuDS Manual is proposed. The site is currently served by a 225mm diameter surface water sewer spur which discharges to the existing 225mm diameter public surface water sewer on the south side of the Monastery Road

There is no predicted impact in respect of foul sewer, stormwater and potable water, that would warrant the preparation of an EIA report.

Traffic and Transportation

With reference to the Traffic and Transport Assessment[11] by Martin Rogers Consulting Ltd; the proposed access arrangements are so that the adjacent roundabout which will provide access to and from the development is at present congested, the proposed development will add very marginally to these congestion levels;

It has been shown by the application of recognised assessment techniques that while the Monastery Road / Woodford Hill junction is congested, in reality, the proposed development represents imperceptible increases on existing congestion. Furthermore, the proposed development through the mobility management process will actively drive the move away from private car usage for the journey to work. Cycle parking availability and the existence of high-quality public transport linkages will greatly aid this process of modal shift.

The Parking and Mobility Management Plan by Martin Rogers Consulting Ltd[12] has been prepared to insure the sustainability of the limited provision of car parking at the subject site, consistent with the New Apartment Guidelines but below the maximum provision as detailed by the planning authority. This report has demonstrated that the proposed reduced car parking provision for the residential development is entirely

sustainable based on current car ownership and modal splits for the journey to work for existing residents living within Electoral Districts close to the subject site.

Further detail is presented in the Traffic and Transport Assessment and included with the planning documentation.

On the basis of the above the potential effects on Traffic and Transportation are ***neutral***, ***imperceptible***, and ***long term*** for the operational phase. There are no likely significant effects in terms of Traffic and Transportation, and it would not warrant preparation of an EIA on these grounds.

Flood Risk

The Site-Specific Flood Risk Assessment by Lohan & Donnelly Consulting Engineers concludes that the proposed development is categorised as Flood Zone C. The report concludes the various residual flooding risk as Tidal (negligible), fluvial flooding (negligible), pluvial flooding (Low), ground water (Low), and failures of mechanical systems (Low). There is no likelihood of significant effects on material assets from the proposed development as a consequence of flooding.

Waste and Waste Management

The proposed development will give rise to a variety of waste streams during the operational phase, i.e. when the project is completed, and fully operational.

Implementation of the prepared OWMP will ensure a high level of recycling, reuse and recovery at the development. All recyclable materials will be segregated at source to reduce waste contractor costs and ensure maximum diversion of materials from landfill, thus achieving the targets set out in the *EMR Waste Management Plan 2015 – 2021*.

During the operational phase, a structured approach to waste management as set out in the Operational Waste Management Plan will promote resource efficiency and waste minimisation. After the mitigation measures are implemented and a high rate of reuse, recycling and recovery is achieved, the predicted impact of the operational phase on the environment will be ***long-term, neutral*** and ***imperceptible***.

Conclusion

The land on which the site is situated is a material asset. It has been zoned for residential 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. Once constructed, the operational phase will provide an important material asset for the area in terms of residential units and open space.

There are no likely significant environmental effects in terms of the material assets, for the proposed development and considering the existing environment and proposed future environment which would warrant preparation of an EIA.

5.9 ASSESSMENT OF POTENTIAL IMPACTS FROM INTERACTIONS AND CUMULATIVE IMPACTS

5.9.1 Interactions

This section discusses the potential interactions and inter-relationships between the environmental factors discussed in the preceding sections. This section covers both the construction and operational phase of the proposed development. In accordance with the guidance not only are the individual significant impacts required to be considered when assessing the impact of a development on the environment, but so must the interrelationships between these factors be identified and assessed.

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

There is a potential for significant negative interactions between land, soil geology, hydrogeology and hydrology, and biodiversity through poorly managed surface water run-off during the construction phase of the proposed development. This is mitigated through the implementation of a Construction Management Plan (CMP). Implementation of an agreed CMP will ensure that there will be no adverse impacts on surface or ground water quality. The final CMP will include specific mitigation measures with regards to the release of hydrocarbons, polluting chemicals and contaminated waters control.

There is a potential for moderate negative interactions during the construction activity in terms of air quality and of dust generated to impact on human health and biodiversity. The potential impact of noise and vibration on human health. These are potential short-term interactions associated with the construction phase. The CMP minimisation measures to ensure that pollution and nuisances arising from demolition, site clearance and construction activities is prevented where possible and managed in accordance with best practice and any subsequent planning conditions relevant to the proposed development.

5.9.2 Cumulative Impacts

As part of the assessment of the proposed development, account has been taken of planned, permitted and existing developments in the area, as well as existing local land uses.

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

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

Any future development will be required to incorporate appropriate mitigation measures (e.g. noise management, dust management, traffic management, management of water quality in run-off water, landscape, etc) during the construction phase as such any cumulative development will not have a significant effect on human health, material assets, land, soils, geology, hydrogeology, and hydrology.

As part of the AA Screening, in addition to the proposed development, other relevant projects and plans in the region must also be considered at this stage. This step aims to identify at this early stage any possible significant cumulative effects / impacts of the proposed development with other such plans and projects. The report also considers 'in-combination effects' and notes relatively large-scale projects which have been granted permission in the area.

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

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

6.0 FINDINGS AND CONCLUSIONS

The purpose of this EIA Screening Report has been to consider whether there is a requirement for the preparation of an Environmental Impact Assessment Report (EIAR) for the proposed development. This has been prepared to accompany the Strategic Housing Development Application to South Dublin County Council for residential development at Monastery road, Clondalkin, Dublin 22.

The proposed development and component parts have been considered against the relevant thresholds outlined in Schedule 5, Part 2. The most relevant project type in the context of the proposed development is Class 10 (b) (i) and (iv);

> *10. Infrastructure projects –*
>
> *(b)(i) Construction of more than 500 dwelling units;*
>
> *(b)(iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere;*
>
> *(In this paragraph, 'business district' means a district within a city or town in which the predominant land use is retail or commercial use).*
>
> *15. Any project listed in this Part which does not exceed a quantity, area or other limit specified in this Part in respect of the relevant class of development but which would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.*

On the basis of the evaluation set out in Section 2.0 an EIA for the proposed Project is not mandatory; the proposed project is considered to be a sub-threshold development and therefore there is discretion over the submission of an EIAR with the planning application. The proposed development is below the thresholds of a mandatory EIAR. The screening exercise has been completed in this report and the methodology used has been informed by the available guidance, legislation and directives.

AWN has considered the proposed development and assessed the potential for significant environmental effects after the implementation of mitigation measures as set out in Appendix A. This assessment has considered the requirement an EIAR on a discretionary basis; this evaluation is documented Sections 3.0, 4.0 and 5.0.

The Appropriate Assessment Screening concluded that “No Natura 2000 sites are within the zone of influence of this development. Having taken into consideration the effluent discharge from the proposed development works, the distance between the proposed development site to designated conservation sites, lack of direct hydrological pathway or biodiversity corridor link to conservation sites and the dilution effect with other effluent and surface runoff, it is concluded that this development would not give rise to any significant effects to designated sites. The construction and operation of the proposed development will not impact on the conservation objectives of features of interest of Natura 2000 sites”.

It is anticipated that the implementation of, and compliance with the prepared Construction Management Plan (CMP) by the construction contractor prior to commencement will address potential short-term nuisances (such as dust and noise etc.) and risks from the storage of any hazardous substances (fuels, chemicals and other construction materials that may pose a risk to the environment) are avoided and minimised. The CMP will ensure potential nuisances during the construction of the facility are avoided and minimised.

AWN has concluded, there are no likely significant environmental effects on the receiving environment for the proposed development, which would warrant preparation of an EIA.

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.

A mandatory EIA is not required for the proposed development, and as the potential effects are not significant; there is not a requirement for an EIAR to be submitted with this planning application.

7.0 REFERENCES

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