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# **Statement of Required Information specified in Schedule 7A to the Planning and Development Regulations, 2001**

## **Section 146B Amendment to Build-To-Rent Residential Development approved under ABP Ref. No. ABP-303803-19**

**Units 5A-C Second Avenue, Cookstown Industrial Estate,  
Tallaght, Dublin 24**

**Stranwil Ltd**

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## 1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2, have prepared this Statement of Required Information specified in Schedule 7A to the Planning and Development Regulations, 2001, on behalf of our client, Strandwil Ltd., to accompany a Section 146B Amendment to Strategic Housing Development pertaining to Units 5A-C Second Avenue, Cookstown Industrial Estate, Tallaght, Dublin 24 (ABP Ref. No. ABP-303803-19). This statement provides information specified in Schedule 7A to the Planning and Development Regulations, 2001, in respect of the alterations. More specifically, in relation to:

1. Schedule 7A 2. A description of the aspects of the environment likely to be significantly affected by the proposed development.
2. Schedule 7A 3. A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from—
  - (a) the expected residues and emissions and the production of waste, where relevant, and
  - (b) the use of natural resources, in particular soil, land, water and biodiversity.

## 2.0 Legislative Context

Schedule 7A to the Planning and Development Regulations, 2001 (as amended), relates to information to be provided by the Applicant or Developer for the purposes of screening sub-threshold development for environmental impact assessment in accordance with the requirements of EU Directive 2014/52/EU pertaining to Environmental Impact Assessment. In cases where a project constitutes a “sub-threshold development” (i.e. it falls below the limit, quantity or threshold prescribed for that class of development outlined in Schedule 5 of the Planning and Development Regulations, 2001 (as amended)), it is necessary for An Bord Pleanála to undertake a case-by-case examination to determine whether the proposed development is likely to have significant effects on the environment.

Schedule 7A reads as follows:

1. *A description of the proposed development, including in particular—*
  - (a) *a description of the physical characteristics of the whole proposed development and, where relevant, of demolition works, and*
  - (b) *a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.*
2. *A description of the aspects of the environment likely to be significantly affected by the proposed development.*
3. *A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from—*
  - (a) *the expected residues and emissions and the production of waste, where relevant, and*
  - (b) *the use of natural resources, in particular soil, land, water and biodiversity.*
4. *The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7.*

To assist An Bord Pleanála in undertaking their examination to determine whether the proposed development is likely to have significant effects on the environment, the proposed amendment will be considered under following headings:

- Population
- Human health;
- Biodiversity;
- Land;
- Soil;
- Water;

- Air;
- Climate;
- Material assets;
- Cultural heritage, including architectural and archaeological aspects;
- Landscape;
- Risks of major accidents and/or disasters; and
- Inter-relationship between the above factors.

### **3.0 Assessment of Potential Environmental Impacts**

With regards to effects on the environment, the proposed development resulting from the proposed amendments is a 'build-to-rent' housing development, comprising 4 no. blocks accommodating 204 no. residential apartments, on a site area of c. 0.595 hectares (c. 1.47 acres). This is not a large scale project or overly dense in an urban context. There are no apparent characteristics or elements of the design of the scheme that are likely to cause significant effects on the environment. A more detailed assessment of the proposed developments impact on the environment is provided under various headings below:

#### Population and Human Health

Construction sites pose potential risk to the health and safety of the public. However, access by the public would be considered trespassing on private property. Assuming observance of private property, no health and safety impacts to the public would be anticipated.

There may be possible short-term nuisances to human beings during the construction phase of the development as a result of noise, dust and minor traffic delays/diversions resulting from material deliveries and ground excavation works during demolition and construction. Noise, dust and pollution will be subject to standard mitigation measures as per typical construction projects. Construction vehicles and plant will give rise to exhaust and particulate emissions. No adverse effects on human health from vehicle and plant emissions during construction are anticipated.

During the operational phase the risk to human health is considered to be negligible. The proposed design provides for the segregation of pedestrians and traffic and incorporates the principles of universal access and the requirements of Part M of the Building Regulations so that the development will be readily accessible to all, regardless of age, ability or disability.

With regards to population, the construction phase of the proposed development should not have any direct impact on the population of the area as no additional persons will be housed on site. However, 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.

Once completed, the proposed development will deliver 204 no. residential units with associated communal amenity spaces, a creche, 2 no. commercial units (one accommodating a convenience shop) and an office. The proposed residential units, once available, will reduce pressure on the existing rental market in the area.

In the case of the proposed residential units, a high standard of living which will be beneficial for the wellbeing of the future inhabitants, will result from the layout/quality of the proposed units, the large open space areas and the ancillary services provided on site. Residents of the surrounding area will also benefit from the commercial unit and landscaped area provided along the Cookstown Way, Second Avenue and newly created plaza frontages.

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.

**Biodiversity**

The subject site is devoid of any ecological significance having previously been almost entirely dominated by man-made structures such as buildings and hard surfaces.

With regards to effects on a European site, from analysis of the NPWS mapping system it was determined that the site of the proposed development and the corresponding grid connection is not located in a site of European importance (Natura 2000 Site). The screening process has examined the details of the proposed residential development and has considered the conservation interests of a range of Natura 2000 sites within a 10km radius of the site (Table 1.0 below). The proposed development will have no direct or measurable indirect impacts on the habitats in question. The screening assessment found that significant impacts of the proposed development on the qualifying interests of the SPA's and SAC's are not likely. Accordingly, progression to Stage 2 of the Natura Impact Statement process is not considered necessary.

Designated Area	Site Code	Distance from Subject Site
Glenasmole Valley SAC	001209	4km
Wicklow Mountains SAC	002122	6.3km
Wicklow Mountains SPA	004040	8.3km

Table 1.0 List of Special Areas of Conservation (SAC) and Special Protected Areas (SPAs) and their distance from the subjects site

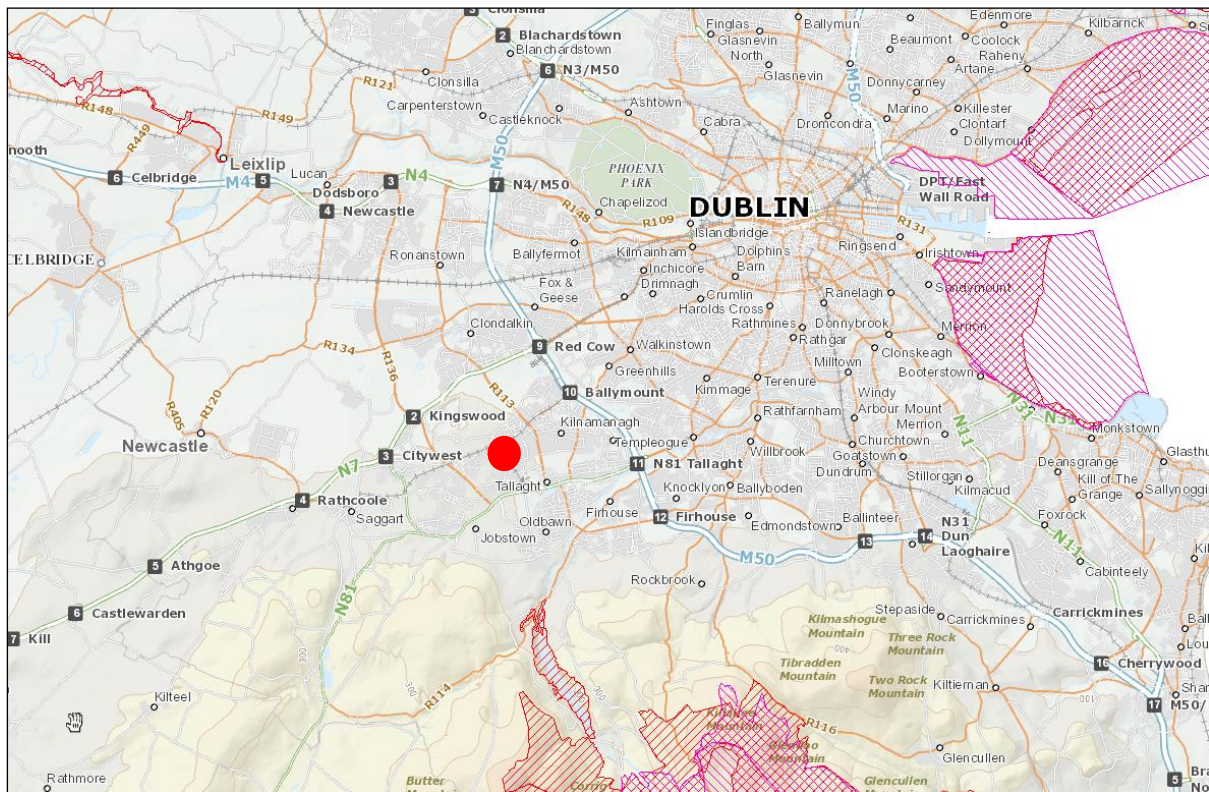


Figure 1.0 Extract from [www.npws.ie](http://www.npws.ie) showing the application site (outlined in red) and proximate Natura 2000 habitats

It is worth noting that the Inspectors Report, issued in relation to An Bord Pleanála Ref.: ABP-303803-19, including the following commentary on the need for a Stage 2 Appropriate Assessment to be prepared for the subject site:

- 11.8.4. *I have had due regard to the screening submission by the applicant and the details available on the NPWS web-site in respect of the Natura 2000 sites identified as being within 15km radius of the development site, including the nature of the receiving environment and proximity to the nearest European site. I consider it is reasonable to conclude that on the basis of the information on the file which includes inter alia, AA screening report submitted by the applicant and all of the planning documentation, which I consider adequate in order to issue a screening determination, that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on any European site, in view of the said sites' Conservation Objectives, and a Stage 2 Appropriate Assessment (and submission of a NIS) is not therefore required.*

The Inspectors Report, issued in relation to An Bord Pleanála Ref.: ABP-307177-20, also included the following commentary on the need for a Stage 2 Appropriate Assessment to be prepared for the subject site in the context of a S146B amendment:

- 7.28 *The original application to which the amendments under this application relate (ABP SHD Ref. 303803-19), described the screening for appropriate assessment associated with the proposed development. None of the amendments applied for under this application, would alter the conclusions reached as part of that original assessment. As such, the conclusion remains that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on any European site, in view of those sites' Conservation Objectives, and a Stage 2 Appropriate Assessment (and submission of a NIS) is not therefore required.*

Given the above, it is considered that the proposed development will not impact on the existing flora and fauna network in the area.

The proposed development includes large areas of landscaping and planting. Once completed, the development will enhance the flora and fauna network in the area.

#### Land, soil, water, air and climate

##### *Lands and Soils*

The construction phase of development of the subject site will necessitate the demolition of the existing buildings on site and the stripping of topsoil and excavation of the underlying subsoils. However, given the location of the site, within an existing built-up area, the loss of both land-use and soils is considered appropriate. The subject lands are a brownfield on what is typically made land.

According to the EPA website, there are no recorded waste disposal or contaminated sites located in proximity to the proposed site. According to the EPA database there are no reported contaminated soil or groundwater issues present at this site.

At operational phase, the proposed development is not likely to have significant effects on the environment with regard to soils and/or geology given the residential nature of the scheme and due to the site being connected to public foul and water services.

##### *Water*

The subject lands are generally brownfield formerly in use as an industrial unit (presently a motor showroom). The lands are zoned and relatively small in scale at c. 0.595 hectares. The construction or operation of the scheme would not use such a quantity of water to cause concern in relation to significant effects on the environment.

The proposed development does not adjoin a river or stream, therefore, there are no anticipated significant effects on the environment arising from the proposed development, in relation to water.

In terms of water integrity, the scheme is to be connected to public foul and storm water systems and as such, no significant effects on the environment are likely.

### *Air & Climate*

There may be a minor degradation of the air quality in a very localised area during certain parts of the construction process. Activities associated with this development such as excavation and backfill having the potential to generate dust. There is no impact on air pollution expected from the development outside of the potential dust impact. Standard dust mitigation measures will be integrated into the construction phase and it is considered that any impact would be short-term and not significant i.e. an effect which causes noticeable changes in the character of the environment but without significant consequences.

There will be no large use of natural resources. The main use of resources will be the construction materials used. The scale and quantity of the materials used will not be such that would cause concern in relation to significant effects on the climate or the environment.

There is the potential for a number of greenhouse gas emissions to the atmosphere during the construction phase of the development. Construction vehicles, generators etc., may give rise to CO<sub>2</sub> and N<sub>2</sub>O emissions, however, the exhaust emissions from on-site plant and site traffic are unlikely to make a significant impact on local air quality.

During the operational stage it is considered that the proposed residential development would not have any significant negative impact in terms of air pollution or climate. The site is located proximate to a number of public transport services, being located adjacent to the Cookstown Luas Stop. The need to travel by car would be reduced and local air quality would benefit. The design incorporates energy efficiency measures to meet the standards of the recently introduced NZEB Part L Regulations and will thus positively contribute to a reduction in fossil fuel use and associated greenhouse gas emissions.

It is considered that there will be no negative impact on the climate that would be likely to have a significant effect on the environment.

### Material assets, including the architectural and archaeological heritage, and the cultural heritage

The land on which the site is situated is a material asset. It has been zoned for development through the appropriate process, and as such, the use of this material asset in a manner compatible with the zoning designation, is entirely appropriate. Once constructed, the operational phase will provide an important material asset for the area in terms of residential units.

The subject lands are not proximate to any Protected Structure or Architectural Conservation Area. There are no known recorded archaeological monuments within the boundary or within several hundred metres of the site.

Once constructed, the development once operational will provide an important material asset for the area in terms of residential units and recreation/amenity.

### The expected effects deriving from the vulnerability of the project to risks of major accidents and/or disasters

Standard construction practices will be employed throughout the construction phase. There are no technologies or substances to be used in the development which may cause concern for having likely significant effects on the environment.

The subject lands are zoned under the South Dublin County Development Plan and as such have been subject to a strategic flood risk assessment as part of the preparation of this plan as well as preparation of the Tallaght Town Centre Local Area Plan 2020. A site-specific flood risk assessment, prepared by GDCL Consulting Engineers (forming part of the Engineering Services Report), included with the parent application to the Board did not highlight cause for concern in terms of flooding allowing for climate change. This assessment concluded that the site is at low risk of flooding from fluvial, pluvial, tidal and groundwater sources.

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.

#### The inter-relationship between the above factors

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

It is considered that there are no likely significant effects on the environment in terms of any of the factors, individually or cumulatively.

#### **4.0 Conclusions**

The proposed development has been screened in accordance with the EU Screening Guidelines. The proposed development is below the threshold of a mandatory EIAR outlined in Schedule 5(10) of the Planning and Development Regulations, 2001 (as amended). The proposal involving 204 no. built-to-rent units, which is also below the 500 unit threshold, and the overall size of the site is also well below the site area threshold.

The recommended mitigation measures and standard practices will be employed throughout the construction and operation phase, and documented through the various management plans and standard planning conditions to ensure that the proposed development will not create any significant impacts on the quality of the surrounding environment.

Development of the site for residential use, is appropriate in the context of the site's zoning objective and national policy. With proposed mitigation measures in place, it is not anticipated that the construction or operational phases of the proposed development, whether considered on its own or together with in-combination projects or plans, will give rise to likely significant environmental effects. Therefore, a sub-threshold environmental impact assessment is not required to accompany the application.

Likely positive effects are forecast as the land will provide much needed sustainable residential development consistent with the zoning objective for the site. Enhancement of the site through extensive landscaping will result in a positive biodiversity impact, as will improved public open space area for residents of the surrounding area. The energy efficient measures incorporated into the design will have a positive effect on climate change while the proposed cycle paths will reduce car dependence and promote sustainable transport modes.



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