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ENVIRONMENTAL IMPACT ASSESSMENT SCREENING REPORT FOR A PROPOSED DATA REPOSITORY FACILITY, UNIT 1 M50 BUSINESS PARK, BALLYMOUNT AVENUE, DUBLIN 12

Report Prepared For
Creighton Properties LLC.

Report Prepared By
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&
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Our Reference
NK/227501.0378ES05

Date of Issue

13 December 2022

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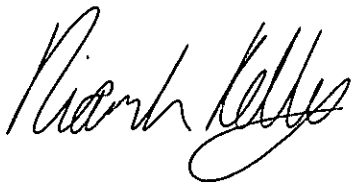
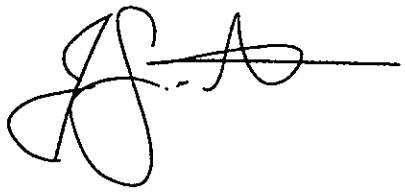
Document History

Document Reference		Original Issue Date	
NK/227501.0378ES05		13 December 2022	
Revision Level	Revision Date	Description	Sections Affected

Record of Approval

Details	Written by	Approved by
Signature		
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1.0 INTRODUCTION

On behalf of Amazon Data Services Ireland Limited (the Applicant), AWN Consulting Limited (AWN) has prepared the following Environmental Impact Assessment (EIA) Screening Report to accompany the planning application for a proposed data repository (the "Proposed Development") at Unit 1, M50 Business Park, Ballymount, Dublin 12. A Data Repository is designed to house tape media that provides a long-term data store solution. A Data Repository utilizes magnetic tape media which requires environmental conditions such as temperature, humidity and particulate-free (ISO 14644-1 Class B for cleanliness levels) to be maintained in a narrow band (16°C-25°C and 20%-50% Relative Humidity). It provides long-term backup data storage with no data processing occurring within a data repository. The Proposed Development site is outlined in red on Figure 1.1.

The subject site is located within the M50 Business Park, Ballymount, Dublin 12, to the west of Ballymount Avenue, at the junction of Calmount Road and Ballymount Road Upper. The subject site currently comprises an existing warehouse building, including two ancillary two-storey offices, a security hut and hardstanding carpark. The proposed works (including demolition) are described further in Section 3 of this report. The site is located approximately 340m north east of the M50 Junction 10, and is accessed via the internal Business Park Road. The surrounding area is characterised by a mix of warehouse and industrial uses.

The Proposed Development will consist of: the change of use from warehouse to data repository facility, alterations to external facades, provision of a new 1100 mm parapet, reclad roof, internal alterations, refurbishment of the existing office space, solar panels at roof level, external plant at ground and roof levels and equipment to include 12 no. condenser modules, an emergency back-up generator and associated fuel storage tank, transformer, extension to the existing sub-station (c. 13 m2), 2 no. sprinkler tanks and pumphouse, bin store, 22 parking spaces including 2 electrical vehicle charging points, bicycle parking shelter, landscaping, planting, new security fence, external lighting, CCTV, altered vehicular gates, permeable hard surfaces, alterations to internal foul sewerage and water supply networks, provision of SuDS compliant surface water drainage system and all associated site. The Proposed Development, including the proposed demolitions works, are described further in Section 3 of this report.

This EIA Screening Report draws on and has been informed by the project design, and should be read in conjunction with full application package that includes complete elevations and floor plans site, layout plans including utilities and building drawings.

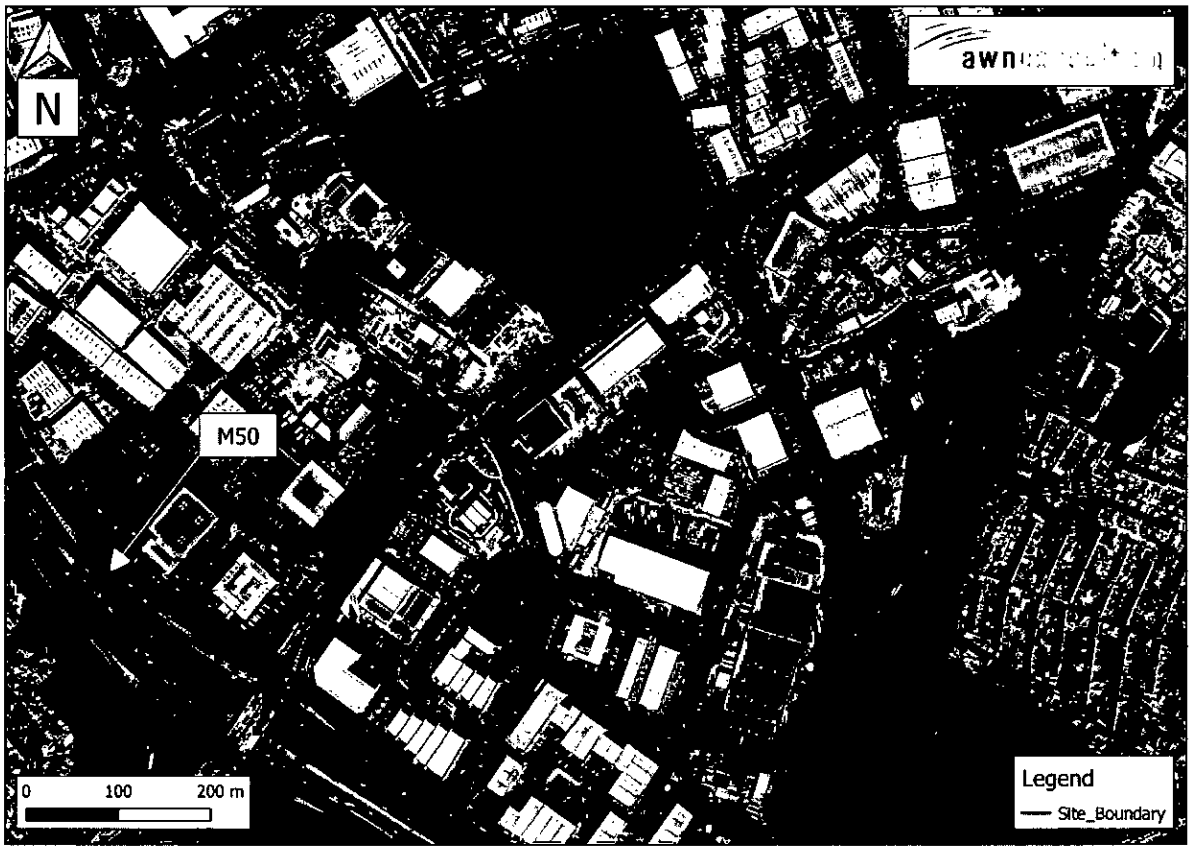

Figure 1.1 Proposed Development site (indicative in red) (source: Google Maps)

The purpose of this report is twofold, to provide the Planning Authority with the information required under Schedule 7A of the Planning and Development Regulations 2001, as amended, 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 the Planning Authority to undertake a screening determination in respect of the need for an Environmental Impact Assessment Report (EIAR) for the Proposed Development.

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 second reason for this report is to document the studies undertaken by the Applicant, and the design team, to consider whether there is a likelihood of significant effects on the environment arising from the proposed development.

Furthermore, this report provides the information which will be considered by the planning authority in making its screening determination, which is set out under Section 176A(3) of the Planning Act 2000 (as amended).

This report along with its appendices, or in separate documents which are referenced in this report and submitted with the planning application includes description of the features, if any, of the proposed development and the measures, if any, envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

The screening process in Ireland comprises: (i) a "preliminary examination" process (Article 103(1)), where the planning authority considers the nature, size or location of the development; and (ii) a "screening determination" process (Article 103(1B)) where the planning authority considers the information in the Planning Act, Article 103(1A) and Schedule 7A of the 2001 Regulations, the criteria in Schedule 7 of the 2001 Regulations, and the other prescribed factors in Article 103(3) of the 2001 Regulations.

Pursuant to Article 103(3)(iv) of the Planning & Development Regulations 2001, as amended, information on how the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive have been taken into account is included in this EIA screening report. 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 of this document 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 EIA Screening methodology:

- Environmental Impact Assessment Screening, OPR Practice Note PN02 (Office of the Planning Regulator, 2021).
- European Union (Planning & Development) (Environmental Impact Assessment) Regulations 2018.
- Guidelines on the Information to be contained in Environmental Impact Assessment Reports. (2022). Environmental Protection Agency.
- 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.
- 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.
- 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

The national requirements to provide an EIA with a planning application is outlined in *Planning and Development Act 2000 as amended* (the Act) and *Planning and Development Regulations, 2001 as amended* (the Regulations). 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.

There is a mandatory requirement for an EIA Report under Section 172(1)(a) of the Act 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.

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 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 sets out the relevant criteria to be considered by the Planning Authority.

Section 176A(2)(a) of the Act states that an application for screening for environmental impact assessment may be submitted to the Planning Authority. The scope of the information to be provided by the developer when an application for screening is made is set out in Section 176A(3) of the Act, Schedule 7A of the Regulations, and Annex II A of the EU Directive. Pursuant to Article 103(3)(iv) of the Planning & Development Regulations 2001, as amended, information on how the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive have been taken into account is included in this EIA screening report.

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 EPA Guidelines (2022). The potential for significant effects of the proposed Project has been considered against Annex II A of the EIA Directive 2011/92/EU as amended by 2014/52/EU and 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* and *Guidance on the preparation of the Environmental Impact Assessment Report* as well as the published *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessmen*t.

It is important for the Planning Authority to note that Article 27 of the EIA Directive 2011/92/EU as amended by 2014/52/EU 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 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 EPA Guidelines (2022).

The key steps to screen for an EIA set out in Section 3.2 of the EPA Guidelines are as follows:

1. Is the development a type that 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 of 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 of this report.

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 within this report, along with its appendices, or in separate documents which are referenced in this report and submitted with the planning application 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:

- Characteristics of Proposed Development (Section 3.0)
- Location of Proposed Development (Section 4.0)
- Types and Characteristics of Potential Impacts (Section 5.0)

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 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. Schedule 7A of the Regulations requires:

1. A description of the proposed development, including in particular—(Section 3.0)
    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. (Section 4.0)
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— (Section 5.0)
    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

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.*' 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). The preparation and co-ordination of this EIA Screening report has been completed by AWN and has relied on specialist input from the project design team and applicant, as per Table 1.1.

Table 1.1 Applicants Project Team

Role	Contributor
Architectural Design	Kavanagh Tuite Architects
Planning Consultant	MacCabe Durney Barnes
Landscape Design	Macro Works
Civil Engineering, Traffic and Transportation	Clifton Scannell Emerson Associates (CSEA)
Population and Human Health; Land Soils, Geology, Hydrogeology, and Hydrology; Air Quality and Climate; Noise and Vibration; Material Assets and Waste Management	AWN Consulting Limited
Landscape and Visual Impact Assessment	Macro Works
Biodiversity including Appropriate Assessment Screening	Moore Group Environmental Services
Bat Survey and Report	Altemar Environmental Consultants Ireland,

Each environmental specialist of the applicants project team was commissioned having regard to their previous experience in EIA; their knowledge of relevant environmental legislation relevant to their topic; familiarity with the relevant standards and criteria for evaluation relevant to their topic; ability to interpret the specialised documentation of the construction sector and to understand and anticipate how their topic will be affected during construction and operation phases of development; ability to arrive at practicable and reliable measure to mitigate or avoid adverse environmental impacts; and to clearly and comprehensively present their findings.

The various reports address a variety of environmental issues and assess the impact of the Proposed Development and demonstrate that, subject to implementation of the construction and design related mitigation measures in this report, the Proposed Development will not have a significant impact on the environment. This EIA Screening Report should be read in conjunction with the plans and particulars submitted with the planning application.

This EIA Screening report was prepared by Niamh Kelly and Jonathan Gauntlett. Niamh Kelly is an Environmental Consultant in the waste management section of AWN and an Affiliate Member of the Chartered Institute of Waste Management (CIWM). She holds an MSc in International Disaster Management from the University of Manchester and a B.A. in Earth Sciences from Trinity College Dublin. She has prepared the Waste EIAR chapter for various developments including residential, commercial and industrial.. Jonathan is a Principal 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 (2022) 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 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.

There is no specific project type listed under Schedule 5, Part 1 or Part 2 of the Regulations for the Proposed Development of a 'data repository facility'.

A wider consideration of the component parts of the project the Proposed Development has been undertaken and the project would most appropriately fall under the project type *Schedule 5, Part 2, Class 10 Infrastructure Projects*. Class 10 is of a type that sets out project thresholds; therefore, the next screening step is to determine whether the project exceeds the specific project threshold.

2.3 IS THE PROJECT ABOVE THE THRESHOLD FOR EIA?

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

10. Infrastructure projects

(a) Industrial estate development projects, where the area would exceed 15 hectares.

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

The total site area for the proposed works is 0.8915 hectares. The site location is not within a business district (a district where the predominant uses are retail or office/commercial type users) but is within an industrial estate setting; therefore, 10 hectares is the appropriate threshold under class 10(iv). The Proposed Development site is not equal to nor does it exceed the limit, quantity or threshold set out in Class 10(a) or Class 10(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*'. A project 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 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 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 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 and presents the information required by Article 103 and 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 THE PROPOSED DEVELOPMENT

This section addresses the characteristics of the Proposed Development by describing the development in detail. This is to identify all areas of potential issues to explore further and assess for impacts.

3.1 DESCRIPTION OF PROPOSED DEVELOPMENT INCLUDING SIZE AND DESIGN OF THE PROPOSED DEVELOPMENT

The Proposed Development will consist of: the change of use from warehouse to data repository facility, alterations to external facades, provision of a new 1100 mm parapet, reclad roof, internal alterations, refurbishment of the existing office space, solar panels at roof level, external plant at ground and roof levels and equipment to include 12 no. condenser modules, an emergency back-up generator and associated fuel storage tank, transformer, extension to the existing sub-station (c. 13 m2), 2 no. sprinkler tanks and pumphouse, bin store, 22 parking spaces including 2 electrical vehicle charging points, bicycle parking shelter, landscaping, planting, new security fence, external lighting, CCTV, altered vehicular gates, permeable hard surfaces, alterations to internal foul sewerage and water supply networks, provision of SuDS compliant surface water drainage system and all associated site. The Proposed Development, including the proposed demolitions works, are described further in Section 3 of this report.

The various reports prepared by the specialist consultants (Table 1.1) are included in Appendices A – G. These reports describe particular aspects of the scheme in further detail, and form part of the overall EIA Screening report. The existing security hut will be retained and used as a security hut. A bin store and sheltered bike storage are also provided. It is also proposed to extend the existing substation by 13 m^2.The site layout for the Proposed Development is presented in Figure 3.1 below.

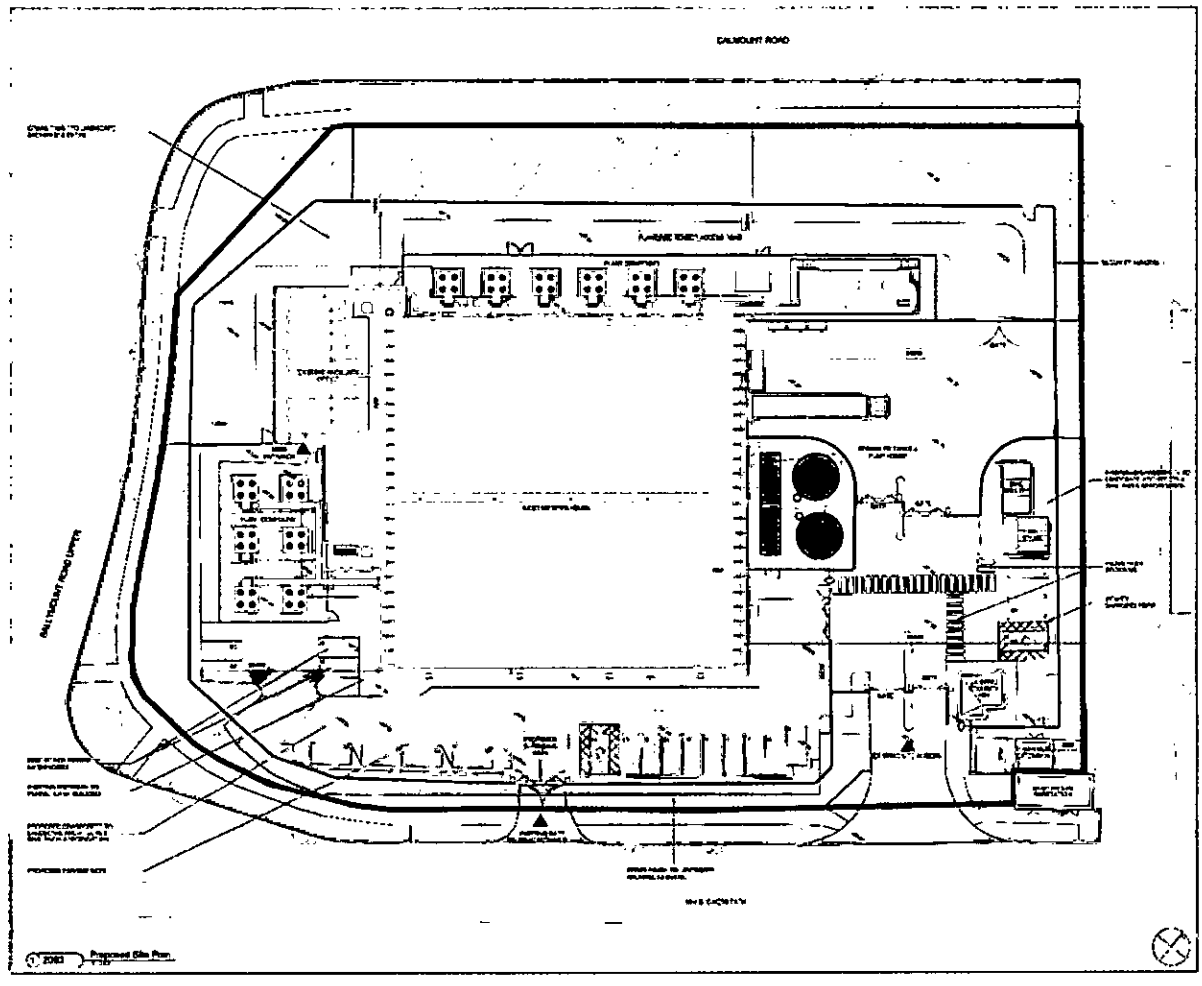

Figure 3.1 Proposed Site Plan (Source: Kavanagh Tuite Drawing Number KTA-22-XX-DR-A-2003)

The subject site is zoned *'Objective EE – To provide for enterprise and employment related uses'* in the SDCC South Dublin County Development Plan 2022-2028. The zoning of the site is shown in Figure 3.2, below.

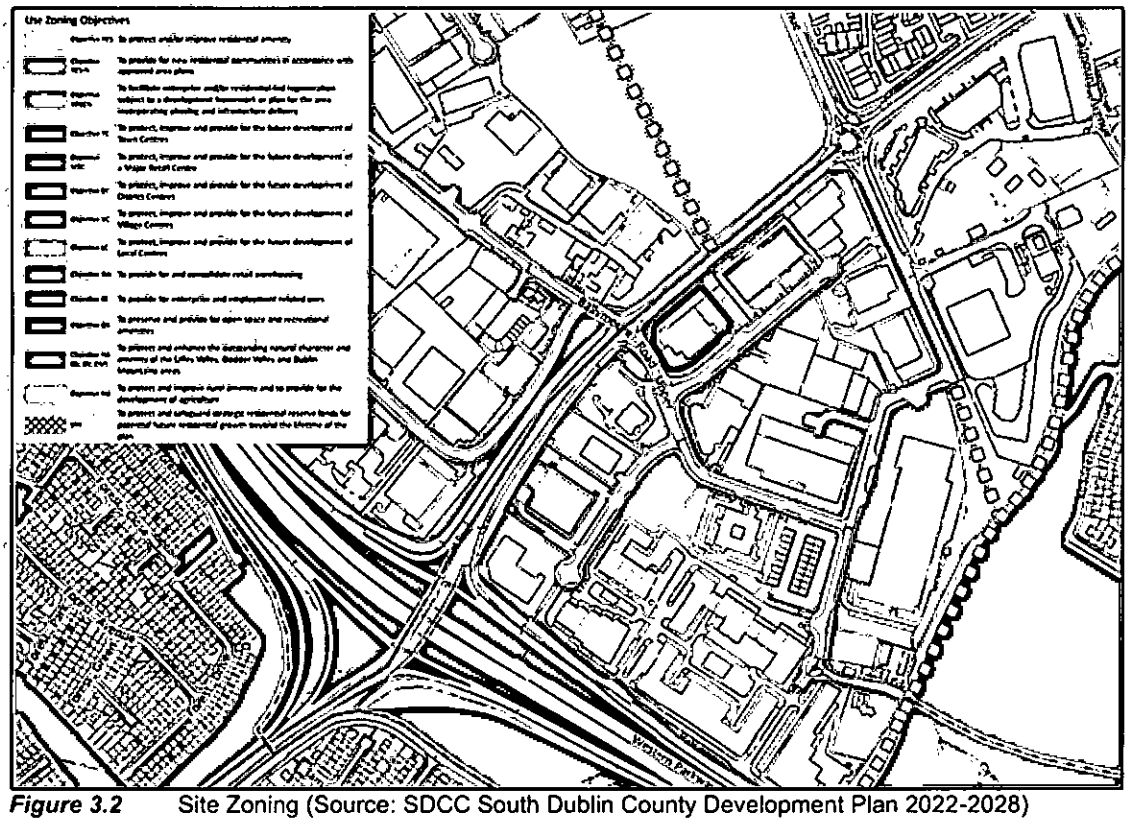

Figure 3.2 Site Zoning (Source: SDCC South Dublin County Development Plan 2022-2028)

3.1.1 Construction Phase

An initial demolition phase will take place, the works are limited to a removal of external facades roof, and internal areas including the demolition of the existing mezzanine floor of the warehouse buildings, circa 115 m^2 of internal floor space. The structure of the warehouse building will not be demolished. It is expected that waste materials will be generated from the demolition of the existing mezzanine floor, works to the existing cladding and roof and internal alterations to facilitate the change of use. The proposed timeline for demolition works is 5 weeks in total and is included within the overall construction phase.

Ground works will be required to clear the site and to facilitate construction of building structures, roads, the installation of utilities and landscaping on areas external to the existing warehouse.

The removal of c. 600m^3 spoil generated during site preparation/levelling is anticipated to be removed from site with some top soil and spoil used in landscaped areas.

The estimated construction duration for the proposed development is 36 weeks. This includes all site works, building upgrade works and full building fit-out and will all be constructed in a single phase. It is envisaged that construction will commence in March 2023 and will be complete in December 2023, subject to grant of planning permission.

A temporary construction compound (c. 8m x 30 m) site office and welfare facilities will be established on site within the Site boundary as indicated in Figure 3.1. Welfare facilities (canteens, toilets etc.) will be available within the construction compound on

site. Utility connections to the existing site services will be utilised to provide service and utilities subject to relevant applications and approvals as required by Irish Water, South Dublin County Council and ESB.

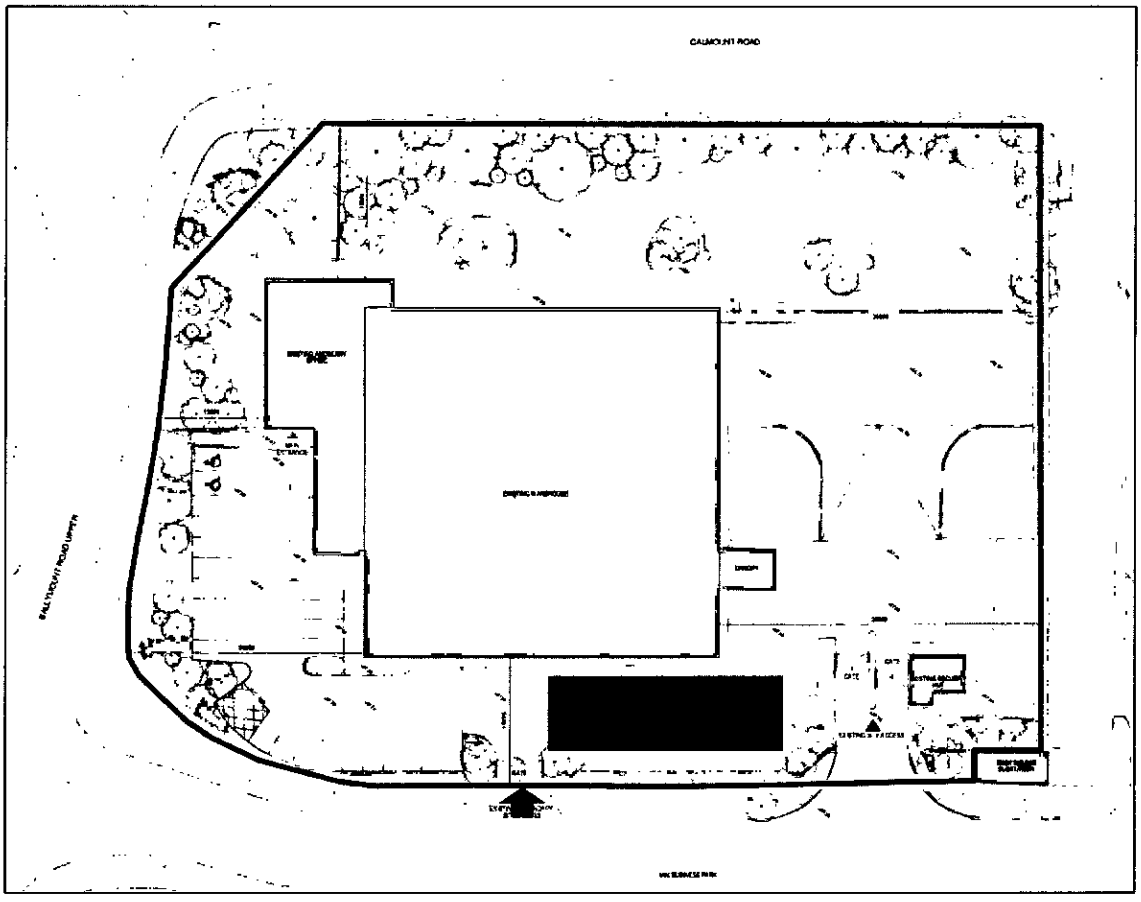

Figure 3.1 *proposed construction compound and contractors access shown in blue.*

For the duration of the proposed construction works the maximum working hours shall be 07:00 to 19:00 Monday to Friday (excluding bank holidays) and 08:00 to 16:00 Saturdays, or as otherwise specified in planning conditions.. No working will be allowed on Sundays and Public Holidays.

Construction traffic has been estimated by CSEA (2022) using data obtained from a similar data repository facility development that used a similar construction methodology to the current development. The following construction data has been used to estimate peak daily construction traffic:

- Average construction staff for data repository facility: 25;
- Peak construction staff for data repository facility: 40;
- Average cars/ day for data repository facility: 25;
- Peak cars/day for data repository facility: 40
- Peak HGVs/day for data repository facility: 10; and
- Peak LGVs/ day for one data repository facility: 10.

Overall general retention of boundary hedgerows during construction, maintaining as much of the existing Landscape/Townscape structure on the site in so far as possible and bolstering green infrastructure links along the site's perimeter.

3.1.2 Operational Phase

The main single storey warehouse building is to be used to house tape media which will store and be a repository for data. Customer data is stored on tape media within a temperature and humidity-controlled environment, inside one of two tape libraries. The facility is specifically for data archiving and cold storage of information and retrieval by customers is typically occasional. This form of data storage requires significantly less power consumption than a typical data centre. There is no provision of associated new electricity grid connection infrastructure, as it will utilise existing ESB networks infrastructure.

There will be ancillary offices, staff welfare facility, toilets, security, mechanical and electrical plant in the building and outside on site. The existing ancillary office element at the western end of the building will be refurbished and used by employees of the data repository.

The architectural design of the Proposed Development utilises high quality materials and reflects the existing pattern of development in the surrounding area. A detailed description of the architectural rationale and characteristics of the proposals is provided within the Design Statement prepared by Kavanagh Tuite Architects, which accompanies the planning application.

The Landscape Design Rationale prepared by Macroworks describes the landscape design, which forms an integral part of the overall design. The landscape design was developed to maximise the opportunity for green infrastructure and biodiversity to the local environment and surrounding context of the site.

For further detail on the physical characteristics of the Proposed Development refer to the architectural and engineering drawings and the Engineering Services Report Drainage and Water Services prepared by CSEA engineers which accompany this planning application.

Surface Water Drainage

The proposed surface water network for the development collects runoff from roofs, roads and other hard standing areas in a sealed system of pipes and gullies. In addition to this, discharge from humidifiers and air conditioning units are collected by pop-ups which connect to 150mmØ internal surface water pipework which discharge into a 225mmØ surface water pipe external to the building. The pipe network outfalls to 3 no. surface water attenuation systems located to southwest, south and east of the main building. The proposed attenuation systems outfall via carrier drains which discharge attenuated flows to the existing M50 Business Park surface water drainage system.

Foul and Process Wastewater Drainage

The proposed wastewater drainage network collects domestic foul wastewater flows from the main building and the security hut, which are collected by pop-ups which connect to 100mmØ internal pipework which discharge into a 150mmØ foul sewer located externally to the main building and security hut. Foul wastewater accumulated in the southern proposed wastewater drainage network is pumped via the existing pumping station manhole to the foul sewer manhole located north of the main building before out falling in a north-easterly direction to the existing 225mmØ foul sewer network in Calmount Road.

Water Supply

It is proposed that the existing water supply be retained. A new 100mmØ connection is proposed to connect the existing fire flow mains on site to the fire flow tanks. Furthermore, a bulk meter is to be installed on the connection to the 100mmØ uPVC watermain.

External plant and equipment

A back up diesel generator will provide power to the building in the unlikely event of a loss of power supply. These diesel powered generators will be supplied from a bulk storage tank located underneath the generator enclosure. Generators will only be in operation during a loss of power supply or for maintenance testing.

12 no. condenser modules are also proposed on site which are part of the cooling system for tape media libraries. These will be located to the North and West of the main warehouse building, adjacent to the ancillary office.

2 No. sprinkler tanks and a pump house are proposed in the development, located to the East of the main warehouse building.

Access and Parking

Access to the site will be via the existing access located to the east of the site, off the estate road. 22 parking spaces including 2 electrical vehicle charging points. 12 bicycle spaces are proposed in a shelter. The existing loading bay shall be retained.

Security and Lighting

The existing perimeter fence will be retained to present a similar perimeter treatment as other existing units in industrial estate. Behind this fence, a new 2.4m high, anti-climb security fence will be built to provide additional security. CCTV and associated lighting will be installed throughout the site in accordance with the details accompanying the application.

Energy Supply Connection

There is an existing connection agreement in place with ESB to supply power for the proposed development, which has a total peak power demand of 1.3 MW. Power will be supplied via 1 x Medium Voltage (MV) cable connection from the existing ESB substation (permitted and constructed under an existing permission) which is located immediately adjacent to the development site to the West. The proposed development includes the provision of a single-story client control switchgear room which will adjoin the existing ESB substation.

There is an existing connection agreement in place with ESB to supply power for the proposed development.

3.2 CUMULATION WITH OTHER EXISTING OR PERMITTED DEVELOPMENT

As part of the assessment of the effects of the Proposed Development, account has been taken of other existing or permitted development (Appendix A) within the surrounding area that have the potential to combine with the Proposed Development and result in likely significant cumulative effects. Cumulative effects are the effects

arising from the addition of many minor or insignificant effects, including effects of other projects, to create larger, more significant effects.

A preliminary assessment of potential cumulative effects on the environment is facilitated via the Source-Pathway-Receptor (SPR) model which is a multi-step process. The SPR methodology is a tool that ensures the most cautious means of assessment at the preliminary stages of a Proposed Development. The use of this tool ensures that all possible impacts are identified at a very early stage thus enabling further studies, mitigation measures or ameliorative actions to be put in place. The inherent use of the precautionary principle within the SPR methodology means that all potential for environmental impacts can be identified at a preliminary stage without any need for detailed studies, but rather upon available desktop information.

It is imperative to make clear that not all projects within a study area are capable of combining with the Proposed Development to result in potential cumulative effects. In order for there to be a potential cumulative effect all three elements of the SPR elements need to be present. If there is no pathway or functional link (direct or indirect) between the Proposed Development and a receptor, there is no potential for effect. Additionally, if there is no receptor within the area of a potential impact, there is similarly no effect as it does not cause harm to the environment due to the lack of a receptor.

Projects like the one proposed can have an impact on activity in a larger area than only the Site itself. There is no specific guidance available for a generic zone of influence to focus the assessment of existing development, applications in progress (Proposed Development), or applications granted permission (permitted development) that may result in cumulative effects. The research area has been established with reliance on the characteristics of the Proposed Development and proposed emissions,and based on the accessibility of data and taking into consideration a precautionary zone of influence from the potential for environmental effects of the Proposed Development.

In considering the potential effects of the Proposed Development (Section 5), it can be established that closer to the Site, there is a greater potential for impacts. The area of the potential effects may be determined by considering the Proposed Development's potential connectivity using the SPR methodology outlined above.

The primary outward emissions are the emissions to air, and noise during construction and operation. There is no direct pathway to surface water from the from the Proposed Development; therefore, there is no potential for significant impact on receiving waters.

As part of the Screening for an Appropriate Assessment (Moore Group, 2022), in addition to the Proposed Development, other relevant plans and projects in the area are also considered at this stage. This step aims to identify at this early stage any possible significant in-combination effects of the Proposed Development with other such plans and projects on European sites.

In terms of construction dust this tends to be deposited within 200 m of the construction site, the majority of the deposition occurs within the first 50 m based on Transport Infrastructure Ireland (TII) Guidance (2011). The air quality modelling undertaken and set out in Appendix D - Air Quality and Climate Impact Assessment demonstrates that for the operational phase air emissions are effectively dispersed within 200-300 m from the site boundary.

With regard to the aspect of noise during construction and operation of the Proposed Development, it is anticipated that the noise generated by construction equipment on site and operational plant, due to the urban environment and screening effect of

surrounding buildings, while maintaining the noise criteria set out in *British Standard BS 5228 – 1: 2009+A1:2014: Code of practice for noise and vibration control on construction and open sites – Noise* and Table 10 of Appendix C, there is no measurable impact beyond a precautionary study area of 1 km. The potential for significant cumulative effects with existing or permitted development within the surrounding area has been addressed in Section 15.11

3.2.1 Existing Development

Existing development that may be capable of combining with the Proposed Development to result in cumulative effects are those that have similar emission sources or environmental effects during the construction phase of the Proposed Development, or during the operation of these existing developments.

The subject site is zoned '*Objective EE – To provide for enterprise and employment related uses'* in the SDCC South Dublin County Development Plan 2022-2028. The surrounding area is generally characterised by a mix of warehouse, logistics and light industrial uses. The surrounding area has been interrogated through use of google maps and EPA Maps, to as far as is reasonably practical, to identify existing development that may have similar emission sources or environmental effects during the construction phase of the Proposed Development, or during the operation of these existing developments.

A review of the Dublin City Development Plan 2016-2022 and the Draft Dublin City Development Plan 2022-2028, as well as the list of notified establishments available from the Health and Safety Authority (HSA) has been undertaken and the closest Seveso site to the Proposed Development is the Irish Distillers Ltd. site, a Lower Tier site located c. 1.11 km north of the development at Robinhood Road, Fox and Geese, Clondalkin, Dublin 22.

The review of the EPA Maps for Industry sites (IPPC, Waste Facility, and IE Licenced Sites) has been undertaken to identify an initial list of potential emissions sources. Facilities within 1 km of the facility boundary include:

- Galco Steel Limited an IPPC site (EPA Ref P0284-02) located c. 350 m north of the Proposed Development.
- Heiton Buckley Limited site for preservation of wood (EPA Ref P0340-01) located c. 580 m east of the Proposed Development.
- Starrus Eco Holdings Limited (Ballymount) waste disposal activities Licenced site (EPA Ref W0039) located c. 280 m north of the Proposed Development.
- Ballymount Baling Station waste disposal activities Licenced site (EPA Ref W0003) located c. 280 m east of the Proposed Development.
- Starrus Eco Holdings Limited waste disposal activities Licenced site (EPA Ref W0238) located c. 280 m east of the Proposed Development.

There are no other existing developments reasonably known that have similar emission sources or environmental effects which may be capable of combining with the Proposed Development.

3.2.2 Permitted Development

The National Planning Application Map was consulted for the previous 5 years to identify an initial list of applications in progress (proposed development), or applications granted permission (permitted development) that may have the potential of combining with the Proposed Development to result in significant Cumulative

Effects. The National Planning Application Map includes planning application data sourced from the 31 individual local authorities across Ireland. This list of permitted development is shown in Appendix A of this report.

The review has identified no applications in progress (proposed development). The review of this initial list noted a large number of changes of use, retention, installation of photovoltaic panels, and other minor alterations in the vicinity of the Proposed Development. These insignificant proposed and permitted developments are of a scale or extent that would result in effects that would be limited to the proposed and permitted development site itself, therefore they are not capable of combining with the Proposed Development to result in significant Cumulative Effects.

The likely effects of the Proposed Development (as set out in Section 5), are not expected, due to the scale and extent, to have Regional, National or International, or Transboundary impacts. Therefore, a general study area of 1 km from the Site location is included; this distance is sufficient to capture any permitted development that may be capable of giving rise to significant cumulative effects.

3.3 NATURE OF ANY ASSOCIATED DEMOLITION WORKS

During the demolition phase, the works are limited to a stripping of external facades roof, and internal areas including the demolition of the existing mezzanine floor of the warehouse buildings circa 115 m^2 of internal floor space. The structure of the warehouse building will not be demolished. It is expected that waste materials will be generated from the demolition of the existing mezzanine floor, works to the existing cladding and roof and internal alterations to facilitate the change of use. The proposed timeline for demolition works is 5 weeks in total and is included within the overall construction phase.

The accompanying Resource and Waste Management Plan (RWMP) prepared by AWN and included in Appendix E provides details on the disposal of soil and stones, concrete, tiles, ceramics and bricks and other waste materials during this demolition phase.

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.

Land and Soil

The Planning Report prepared by MacCabe Durney Barns (2022) sets out detail on the proposed land use, within the context of the existing and planned land uses of the surrounding area, and the zoning of the site. The area proposed for development within the site has previously been developed and is surrounded by established industrial uses.

The Proposed Development is an effective use of the land, due to the existing availability of critical infrastructure, such as sewage and road systems. There is no loss of greenfield, amenity or agricultural land associated with the Proposed Development.

The Proposed Development will require the excavation and disturbance of c. 600 m^3 soils and stone materials for the purposes of installing underground services and foundations.

There will be a requirement for deliveries of imported engineering fill, and other construction materials. Other construction activities will include site storage of cement and concrete materials and fuels for construction vehicles.

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

The site is served by a 100mmØ uPVC watermain that is located in the sidewalk along the southern site boundary. It is proposed that the existing water supply be retained. A new 100mmØ connection is proposed to connect the existing fire flow mains on site to the fire flow tanks. There is no increase the existing domestic water supply demand associated with the development (Engineering Services Report, CSEA, 2022). The existing daily permitted water demand is 1200 l /day based on the original water connection application. The estimated average water demand for the development is estimated at 1,167 litres per day.

The Engineering Services Report Drainage and Water Services (CSEA, 2022) sets out that there is no increase in the existing domestic water supply demand associated with the development. There is no proposed extraction of groundwater at the site during the construction or operational phase. The construction and operation of the Proposed Development will not use such a quantity of water to cause concern in relation to significant effects on the environment.

Biodiversity

Investigations into the impacts on biodiversity including species and habitats has been undertaken through the Ecological Impact Assessment (EcIA) and Appropriate Assessment (AA) Screening Report undertaken by the Moore Group and included with the planning documentation. The potential for impacts on biodiversity including species and habitats is set out in Section 5.3 as refenced to the Ecological Impact Assessment (EcIA) and Appropriate Assessment (AA) Screening Report.

Habitat surveys were carried out by Moore Group in July and August 2022. No flora or terrestrial fauna species or habitats of national or international conservation importance were noted on site during the surveys. The EcIA (Moore Group, 2022a) defines the Site habitats using the Fossitt's Guide to Habitats in Ireland as mainly consisting of Buildings and Artificial Surfaces (BL3), with areas of Amenity Grassland (GA2), and a mixed species landscaped treeline (WL2) surrounding the perimeter of the Site.

A Bat Fauna Survey for the Proposed Development were undertaken by Altemar Ecology in September 2022. No signs of bats were noted from internal and external inspections of the existing buildings on site, and Altemar (2022) considered the buildings and tree on-site to be of low suitability for roosting bats.

The Bat Fauna Survey (Altemar 2022) notes that '*Given that no bat species were found using the site and the site is brightly lit from within and externally, the proposed project will not have any significant effect on local bat populations*'. Overall, the survey area is considered to be of low importance for roosting bats due to the lack of potential roosting features observed on site.

3.5 PRODUCTION OF WASTE

Construction Phase (incl. Demolition)

During the demolition phase, waste materials will be generated from the demolition of the existing mezzanine floor, works to the existing cladding, roof and internal alterations to facilitate the change of use. The volume of waste generated from demolition will be more difficult to segregate than waste generated from the construction phase, as many of the building materials will be bonded together or integrated i.e. plasterboard on timber ceiling joists, steel embedded in concrete, etc.

A Resource and Waste Management Plan (RWMP) prepared by AWN and included in Appendix E. The RWMP (Appendix E) outlines the estimated demolition waste generation for the Proposed Development. These estimates are presented in Table 3.1, below.

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

Waste Type	Tonnes	Reuse/Recovery		Recycling		Disposal	
		%	Tonnes	%	Tonnes	%	Tonnes
Glass	10.8	0	0.0	85	9.2	15	1.6
Concrete, Bricks, Tiles, Ceramics	61.2	30	18.4	65	39.8	5	3.1
Plasterboard	4.8	30	1.4	80	2.9	20	0.5
Asphalts	1.2	0	0.0	25	0.3	75	0.9
Metals	18.0	5	0.9	80	14.4	15	2.7
Slate	9.6	0	0.0	85	8.2	15	1.4
Timber	14.4	10	1.4	40	8.6	50	4.3
Asbestos	0	0	0	0	0	100	0
Total	**120.0**		**22.1**		**83.4**		**14.5**

During the construction phase, waste will be produced from surplus materials such as broken or off-cuts of timber, plasterboard, concrete, tiles, bricks, etc. Waste from packaging (cardboard, plastic, timber) and oversupply of materials may also be generated. 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. The RWMP (Appendix E) outlines the estimated construction waste generation for the Proposed Development. These estimates are presented in Table 3.2, below.

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

Waste Type	Tonnes	Reuse/Recovery		Recycling		Disposal	
		%	Tonnes	%	Tonnes	%	Tonnes
Mixed C&D	8.5	10	0.9	80	6.8	10	0.9
Timber	7.2	40	2.9	55	4.0	5	0.4
Plasterboard	2.6	30	0.8	60	1.5	10	0.3
Metals	2.1	5	0.1	90	1.9	5	0.1
Concrete	1.5	30	0.5	65	1.0	5	0.1
Other	3.9	20	0.8	60	2.3	20	0.8
Total	**25.8**		**6.0**		**17.5**		**2.6**

Waste will also be generated from construction workers e.g. organic/food waste, dry mixed recyclables (wastepaper, 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.

Material removed off-site could be reused as a by-product (and not as a waste). If this is done, it will be done in accordance with Regulation 15 (By-products) (Previously Article 27 and referred to as Article 27 in this report) of S.I. No. 323/2020 - European Union (Waste Directive) Regulations 2020, which requires that certain conditions are met and that by-product notifications are made to the EPA via their online notification form. Excavated material should not be removed from site until approval from the EPA has been received. The potential to reuse material as a by-product will be confirmed during the course of the excavation works, with the objective of eliminating any unnecessary disposal of material.

If any soils/stones are imported onto the Site from another construction site as a byproduct, this will also be done in accordance with Article 27. Article 27 will be investigated to see if the material can be imported onto this site for beneficial reuse instead of using virgin materials.

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.

Operational Phase

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. These wastes may include organic/food waste, dry mixed recyclables (waste paper, newspaper, plastic bottles, packaging, aluminium cans, tins and Tetra Pak cartons) and non-recyclable waste. Waste fuels/oils, waste printer/toner cartridges, waste electrical and electronic equipment (WEEE) and waste batteries may also be generated infrequently. The majority of waste will be generated from packaging for equipment deliveries to the facility which is likely to be at its peak in the early months of operation.

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). 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 set out in the RWMP (Appendix E), 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 and noise, as well as the potential for pollution of groundwater associated with demolition, excavations and construction. The demolition and construction activities shall only take place in

accordance with standard construction times set out in Section 3.1.1 or as otherwise specified in planning conditions. No activity, which would reasonably be expected to cause annoyance to businesses in the vicinity will take place outside of these standard construction times. If there is any occasion when work must be completed outside these hours advance notice will be provided to the local authority and businesses in the vicinity.

A Construction Environmental Management Plan (CEMP) has been prepared by CSEA (2022b) and is included as Appendix G to this report. The CEMP outlines construction phase mitigation and management of air quality control (dust), noise and vibration, waste and surface water that will be undertaken during the construction phase. All mitigation measures outlined therein will be implemented, as well as any additional measures required pursuant to planning conditions which may be imposed.

The CEMP (CSEA 2022b) will be a live document and it will go through a number of iterations before works commence and during the works. The CEMP sets out requirements and standards which must be met during the construction phase and includes the relevant mitigation measures.

This CEMP will be maintained by the contractors during the construction phases and covers all potentially polluting activities. All personnel working on the site will be trained in the implementation of the procedures.

3.7 RISK OF MAJOR ACCIDENTS AND/OR DISASTERS

The 2014 revision to the EIA Directive introduced the requirement for an assessment of the risk of major accidents and disasters into the scope of an EIA. As explained the recital of the Directive: "In order to ensure a high level of protection of the environment, precautionary actions need to be taken for certain projects which, because of their vulnerability to major accidents, and/or natural disasters (such as flooding, sea level rise, or earthquakes) are likely to have significant adverse effects on the environment. For such projects, it is important to consider their vulnerability (exposure and resilience) to major accidents and/or disasters, the risk of those accidents and/or disasters occurring and the implications for the likelihood of significant adverse effects on the environment."

Landslides, Seismic Activity and Volcanic Activity

There have been no recorded landslide events at the Site. Geological Survey of Ireland (GSI) Landslide Susceptibility Mapping states that due to the local topography and the underlying strata, there is a negligible risk of a landslide event occurring at the Site. There is a very low risk of seismic activity to the Proposed Development site according to the information that is currently available[1]. This means that there is less than a 2% chance of potentially-damaging earthquake shaking in your project area in the next 50 years. Based on this information, the impact of earthquake need not be considered in different phases of the project, in particular during design and construction 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 Flood

[1] https://thinkhazard.org/en/report/119-ireland/EQ

Risk Assessment (FRA) has been prepared by CSEA (2022c) and is included with the planning application documentation for the Proposed Development. Resources on flooding aspects for the subject area were reviewed and included the following:

- Catchment Flood Risk Assessment and Management (CFRAM).
- The Planning System and Flood Risk Management, Guidelines for Planning Authorities (OPW 2009).
- Review of Historic Flood Events Office of Public Works (OPW) on-line database (floodinfo.ie).

The FRA notes that the site is located within Flood Zone C, where the probability of flooding is low. Low Probability flood events have an indicative 1-in-a-1000 chance of occurring or being exceeded in any given year. This is also referred to as an Annual Exceedance Probability (AEP) of 0.1%. The Proposed Development is considered '*Appropriate*' for Flood Zone C.

As noted in the Engineering Services Report Drainage and Water Services prepared by CSEA (2022a), the proposed surface water network for the development collects runoff from roofs, roads and other hard standing areas in a sealed system of pipes and gullies. In addition to this, discharge from humidifiers and air conditioning units are collected by pop-ups which connect to 150mmØ internal surface water pipework which discharge into a 225mmØ surface water pipe external to the building. The surface water drainage pipe network follows the proposed site topography and falls southeast at an average gradient of approximately 0.3 – 1.5%. The pipe network outfalls to 3 no. surface water attenuation systems located to southwest, south and east of the main building. The proposed attenuation systems outfall via carrier drains which discharge attenuated flows to the existing M50 Business Park surface water drainage system.

Major Accidents/Hazards

A review of the Dublin City Development Plan 2016-2022 and the Draft Dublin City Development Plan 2022-2028, as well as the list of notified establishments available from the Health and Safety Authority (HSA) has been undertaken. 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 site to the Proposed Development is the Irish Distillers Ltd. site, a Lower Tier site located c. 1.11 km north of the development at Robinhood Road, Fox and Geese, Clondalkin, Dublin 22. This has a consultation distance of 300 m from the site perimeter according to Dublin City Development Plan 2016-2022. This remains unchanged in the Draft Dublin City Development Plan 2022-2028. The Proposed Development is not within the consultation distance of the Irish Distillers Limited site, and is therefore due to the separation distance there is no interaction with the Proposed Development at this location.

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 (Section 5.2). However, the implementation of the mitigation measures as set out in this report (Section 5.2, below)

and the CEMP included as Appendix G to this report will ensure that the residual effect on the environment is imperceptible.

3.8 RISKS TO HUMAN HEALTH

The EC 2017 *Guidance on the preparation of the Environmental Impact Assessment Report* outlines that human health is a very broad factor that is be highly project dependent. The guidance states: *The notion of human health should be considered in the context of the 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.*

The EPA guidance explains that the scope of population and human health is project dependant but should consider significant impacts likely to affect aspects such as: convenience (expanded range of transport options); nuisance/ disturbance from lighting; displaced settlement patterns (residential); employment opportunities; settlement patterns; land use patterns; access for tourism, amenity, health impacts and/or nuisance due to noise, dust or water pollution; and health and safety.

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. The primary potential impacts of the Proposed Development on human health would be the potential for increased air pollution, noise, or pollution of groundwater/watercourses as a result of the Proposed Development during the construction phase. Once the Proposed Development is operational there are potential impacts in respect of visual impact and traffic are also potential but perhaps lesser significant impacts (based on the location and the nature of the Proposed Development).

The CEMP includes best practice construction methodologies for the control of dust generation, traffic and noise during the construction phase. Any impacts associated with construction dust generation, traffic, and noise will be *temporary in duration (effects lasting less than a year)*.

The subject site is zoned 'Objective EE – To provide for enterprise and employment related uses' in the SDCC South Dublin County Development Plan 2022-2028. As set out in the LVIA (Appendix F (i)) the proposed development will not represent any notable increase in the scale or intensity of built development within the site's immediate surroundings; and will not appear as an inappropriate or incongruous form of development in the context of the site or setting.

The proposed development pertains to a change of use from warehouse to data repository facility, within a site zoned for precisely such activities, set within a large and busy peri-urban business park. There will be no likely significant negative impact on local parks. It is not anticipated that the Proposed Development will have a likely significant negative on local tourism or shopping amenities.

Geological Survey of Ireland (GSI) data indicates that the site does not lie within a drinking water Source Protection Zone. The area is serviced by mains water supply therefore it is unlikely that any nearby wells are used for potable water supply. The proposed mitigation measures during the construction phase, including the implementation of the CEMP will ensure that there are no impacts on groundwater or the stormwater mains.

The Proposed Development design includes a stormwater network in compliance with the requirements of the Greater Dublin Strategic Drainage Study (GDSDS) that will ensure that during the operational phase the risk from diesel spills through the carparks or unloading areas is minimised. Foul wastewater from the Proposed Development will connect to mains supplies that will be treated off-site at Ringsend Waste Water Treatment Plant (WWTP). Following treatment at Ringsend this wastewater will not have a potential impact on local amenities or the local population.

In respect of the foregoing, the Proposed Development does not pose any significant risk to human health, given its nature, scale and location. The potential impacts likely to affect population and human health have been considered in Section 5.1 below.

4.0 LOCATION AND CONTEXT OF THE PROPOSED DEVELOPMENT

This section describes the location of the proposed development with particular regard to environmental sensitivities on site and in the surrounding area.

4.1 EXISTING AND APPROVED LAND USE

The site exists at present as a warehouse building, including two ancillary two-storey offices, a security hut and hardstanding carpark. There is minimal landscaping on the site and the current character of the site is industrial in nature. The boundary of the site comprises treeline and fencing.

The site is bound by Calmount Road to the north-west, an existing warehouse unit to the north east, an internal estate road within the M50 Business Park to the south east, and Ballymount Road Upper to the south west.

The subject site is zoned '*Objective EE – To provide for enterprise and employment related uses'* in the SDCC South Dublin County Development Plan 2022-2028.

The nearest potentially sensitive residential locations (that are inherently more sensitive to changes to the existing environment) include the existing locations at approximately 325 m to the southeast at Greenhills Road, 400 m to the east at Keadeen Avenue and at approximately 520 m to the west at Forest Lawn and Forrest Drive Buildings in the immediate area of the site are commercial in nature.

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

4.2.1 Hydrogeology

The Proposed Development site has been reviewed against the available information prepared by Geological Survey Ireland[2], Teagasc soil maps, and the latest Environmental Sensitivity Mapping webtool[3].

[2] https://www.gsi.ie/en-ie/Pages/default.aspx

[3] https://enviromap.ie/

The GSI (2022) National Bedrock Aquifer Map, the GSI classifies the bedrock aquifer beneath the subject site as a 'Locally Important Aquifer – Bedrock which is Moderately Productive only in Local Zones'. The Proposed Development is within the 'Dublin' groundwater body and is classified as 'Poorly productive bedrock'. The most recent WFD groundwater status for this water body (2013-2018) is 'Good' with a current WFD risk score of 'Not at risk'.

The GSI / (2022) mapping database (data provided by Teagasc) of the quaternary sediments in the area of the subject site indicates the principal subsoil type in the area comprises Till derived from limestones (TLs) and bedrock outcrop or subcrop.

In respect of bedrock, (GSI, 2022) indicates the bedrock underlying the Site is part of the Lucan Formation (code CDLUCN) and made up of dark limestone and shale (Calp).

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 does not show any wells drilled or springs at the Site or surrounding area. 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. Source Protection Zone delineation provides an assessment of the land area that contributes groundwater to a borehole or spring. Source reports are undertaken by Geological Survey Ireland.

In respect of the foregoing, and the review undertaken there are no sensitive soil receptors, no identified areas of geological heritage or groundwater supplies in the vicinity of the Site boundary.

4.2.2 Hydrology

The Proposed Development site lies within the Liffey and Dublin Bay Catchment (Hydrometric Area 09). There are no surface waterbodies within or adjacent to the site of the Proposed Development. The closest surface water feature to the development is the Coolfan Stream, located c. 709 m north of the Proposed Development as shown on Figure 4.1.

The proposed surface water network for the development collects runoff from roofs, roads and other hard standing areas in a sealed system of pipes and gullies. In addition to this, discharge from humidifiers and air conditioning units are collected by the surface water system. The pipe network outfalls to 3 no. surface water attenuation systems located to southwest, south and east of the main building. The proposed attenuation systems outfall via carrier drains which discharge attenuated flows to the existing M50 Business Park surface water drainage system. The proposed development will provide attenuation in compliance with the requirements of the Greater Dublin Strategic Drainage Study (GDSDS). The Engineering Services Report Drainage and Water Services (CSEA) describes the proposed surface water network for the development in further detail.

The existing M50 Business Park surface water drainage system flows to the Coolfan Stream and Robinhood Stream. These confluence with the Carmac River at Naas Road and a further 5.26 km confluences with the River Liffey. There is an indirect hydrological connection via the stormwater network to the River Liffey. There is, therefore, an indirect pathway from the Proposed Development to the designated

European sites at Dublin Bay (South Dublin Bay SAC, North Dublin Bay SAC, North Bull Island SPA and South Dublin Bay and River Tolka Estuary SPA).

There will be no increase on existing foul water demand as a result of the Proposed Development. The Engineering Services Report Drainage and Water Services (CSEA) sets out that the existing average permitted water demand is 0.0535 l/s, and the estimated proposed average demand is 0.0106 l/s The proposed wastewater drainage network collects domestic foul wastewater flows from the main building and the security hut, which are collected by pop-ups which connect to 100mmØ internal pipework which discharge into a 150mmØ foul sewer located externally to the main building and security hut. Foul wastewater accumulated in the southern proposed wastewater drainage network is pumped via the existing pumping station manhole to the foul sewer manhole located north of the main building before out falling in a north-easterly direction to the existing 225mmØ foul sewer network in Calmount Road.

The foul wastewater ultimately discharge to Ringsend Waste Water Treatment Plant (WWTP) where it will be treated to EU standards and discharged to the Liffey Estuary Lower. There is an indirect hydrological connection via the wastewater network to the River Liffey. There is, therefore, an indirect pathway from the Proposed Development to the designated European sites at Dublin Bay (South Dublin Bay SAC, North Dublin Bay SAC, North Bull Island SPA and South Dublin Bay and River Tolka Estuary SPA).

Figure 4.1 *Local Hydrological environment*

4.2.3 Biodiversity and Areas of Conservation

The potential ecological impacts of the Proposed Development have been considered in terms of the sensitivity of the location through the Ecological Impact Assessment

(EcIA) and Appropriate Assessment (AA) Screening Report that have been prepared by the Moore Group and included with the planning documentation.

The site habitats consist mainly of Buildings and Artificial Surfaces (BL3) with areas of Amenity Grassland (GA2) and landscaped Treeline (WL2).

The accompanying AA Screening Report identifies that there is a total of 6 no. SACs and 3 no. SPAs located within the Zone of Influence (ZOI). The closest sites are the Glenasmole Valley SAC (site code: 1209), the Wicklow Mountains SAC (site code: 2122) and the Wicklow Mountains SPA (site code: 4040).

The accompanying AA Screening Report (Moore Group 2022b) has assessed the potential for significant effects 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. An excerpt from the accompanying AA Screening Report concludes that:

> *The Proposed Development entails use of a warehouse as a Data Repository and associated internal alterations. Therefore there are no predicted discharges to the environment and no pathways to any European sites.*
>
> *The Proposed Development will not result in any changes to the amount of surface water run-off from the site during operation nor will it result in any contamination of surface waters during operation and will not result in any changes in foul water arising on the site.*
>
> *Having considered the above, significant effects on any European sites as a result of the Proposed Development have been ruled out and, therefore, potential significant effects on European sites have been excluded at a preliminary screening stage.*
>
> *It has been objectively concluded by Moore Group Environmental Services that:*
>
> 1. *The Proposed Development is not directly connected with, or necessary to the conservation management of the European sites considered in this assessment.*
> 2. *The Proposed Development is unlikely to significantly affect the Qualifying interests or Conservation Objectives of the European sites considered in this assessment.*
> 3. *The Proposed Development, alone or in combination with other projects, is not likely to have significant effects on the European sites considered in this assessment in view of their conservation objectives.*
> 4. *It is possible to conclude that there would be no significant effects, no potentially significant effects and no uncertain effects if the Proposed Development were to proceed.*
>
> *It can be excluded, on the basis of objective information, that the Proposed Development, individually or in combination with other plans or projects, will have a significant effect on a European site.*
>
> *An appropriate assessment is not, therefore, required.*

4.3 ABSORPTION CAPACITY OF THE NATURAL ENVIRONMENT

The Proposed Development, due to its size and localised nature will not have any significant negative 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.

As an industrial / commercial area the M50 Business Park is not a location of significant wetlands, riparian areas, river mouths, mountain and forest areas or nature reserves.

EPA maps (https://gis.epa.ie/EPAMaps/default) confirm that 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 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.

5.0 TYPES AND CHARACTERISTICS OF POTENTIAL IMPACTS

This section sets out the likely significant effects on the environment of the 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 2022) this criteria is duplicated in Table 5.1.

Table 5.1 *Schedule of Impacts following EPA Guidelines*

Characteristic	Term	Description
Quality of Effects	Positive	A change which improves the quality of the environment
	Neutral	No effects or effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error.
	Negative/Adverse	A change which reduces the quality of the environment
Describing the Significance of Effects	Imperceptible	An effect capable of measurement but without significant consequences
	Not significant	An effect which causes noticeable changes in the character of the environment but without significant consequences
	Slight Effects	An effect which causes noticeable changes in the character of the environment without affecting its sensitivities
	Moderate Effects	An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends
	Significant Effects	An effect, which by its character, magnitude, duration or intensity alters a sensitive aspect of the environment
	Very Significant	An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment.
	Profound Effects	An effect which obliterates sensitive characteristics
	Extent	Describe the size of the area, the number of sites, and the proportion of a population affected by an effect.

Characteristic	Term	Description
Describing the Extent and Context of Effects	Context	Describe whether the extent, duration, or frequency will conform or contrast with established (baseline) conditions (is it the biggest, longest effect ever?)
Describing the Probability of Effects	Likely Effects	The effects that can reasonably be expected to occur because of the planned project if all mitigation measures are properly implemented.
	Unlikely Effects	The effects that can reasonably be expected not to occur because of the planned project if all mitigation measures are properly implemented.
Describing the Duration and Frequency of Effects	Momentary Effects	Effects lasting from seconds to minutes
	Brief Effects	Effects lasting less than a day
	Temporary Effects	Effects lasting less than a year
	Short-term Effects	Effects lasting one to seven years.
	Medium-term Effects	Effects lasting seven to fifteen years
	Long-term Effects	Effects lasting fifteen to sixty years
	Permanent Effects	Effects lasting over sixty years
	Reversible Effects	Effects that can be undone, for example through remediation or restoration
	Frequency of Effects	Describe how often the effect will occur. (once, rarely, occasionally, frequently, constantly – or hourly, daily, weekly, monthly, annually)
Describing the Type of Effects	Indirect Effects (a.k.a secondary or Off-site effects)	Effects on the environment, which are not a direct result of the project, often produced away from the project site or because of a complex pathway.
	Cumulative Effects	The addition of many minor or insignificant effects, including effects of other projects, to create larger, more significant effects.
	'Do Nothing Effects	The environment as it would be in the future should the subject project not be carried out
	'Worst case' Effects	The effects arising from a project in the case where mitigation measures substantially fail
	Indeterminable Effects	When the full consequences of a change in the environment cannot be described
	Irreversible Effects	When the character, distinctiveness, diversity, or reproductive capacity of an environment is permanently lost
	Residual Effects	The degree of environmental change that will occur after the proposed mitigation measures have taken effect
	Synergistic Effects	Where the resultant effect is of greater significance than the sum of its constituents (e.g. combination of Sox and NOx to produce smog)

5.1 POPULATION AND HUMAN HEALTH

5.1.1 Construction Phase (incl. Demolition)

The potential impacts of the Proposed Development on human health and populations would be nuisances such as increased air pollution (dust), noise, and visual impact of the construction and demolition phases.

With refence to Air and Climate Impact Assessment (Appendix D) the greatest potential impact on air quality during the construction phase of the proposed development is from construction dust emissions as a result of excavation works, infilling and

landscaping activities and storage of soil in stockpiles. This leads to the potential for nuisance dust.

With refence to Noise Impact Assessment in Appendix C during the construction phase it is expected that there will be some temporary impact on the nearest commercial and industrial properties due to noise emissions from the plant equipment required for construction.

The change of use of the site from its existing use to that of a construction site will give rise to short term and substantially localised effects on landscape character. There will be a slight disruption to the existing Landscape/Townscape pattern as the proposed development will result in the removal of some vegetation and the planting and maturation of others, as well as a relatively modest alteration to the infrastructure within the site.

There is no significant risk of pollution of soil, groundwater or watercourses associated with the Proposed Development as the site is currently developed, there are no water courses on or adjacent to the site, there is limited interventions to the existing soil environment, and there is no proposed emission to soil, groundwater or watercourses during the construction phase.

The construction phase of the Proposed Development will provide for the temporary employment (c. 36 weeks) of construction workers which will provide benefits for local businesses providing retail or other services to construction workers and potential additional employment in the area.

The likely potential impact of the Proposed Development with respect to population and human health during the construction phase can be considered to be ***negative, not significant*** and ***temporary*** *(effects lasting less than a year).*

These potential ***temporary*** impacts during the construction will be mitigated in accordance with the CEMP, and through implementation of binding hours of construction.

The CEMP sets out mitigation measures in the form of requirements and standards in relation to construction noise, traffic, and dust generation that must be met during the construction phase. The CEMP included as Appendix G to this report notes that development will be undertaken in accordance with current British industrial standards, with all mitigation and safety measures put in place to ensure a responsibly managed construction process. All mitigation measures outlined therein will be implemented, as well as any additional measures required pursuant to planning conditions which may be imposed.

The residual impact of the Proposed Development with respect to population human health during the construction phase after the implementation of mitigation measures set out in this report, is ***negative***, ***not significant*** and ***temporary*** *(effects lasting less than a year).*

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of population and human health impacts during the construction phase. Therefore a requirement for subthreshold EIA does not arise.

5.1.2 Operational Phase

The potential impacts of the Proposed Development on population human health and populations would be nuisances such as increased air pollution (dust), noise, risk of accidental discharge or spills to ground, and visual impact of the operational phase.

A detailed Air and Climate Impact Assessment has been undertaken (Appendix D) to assess the impact of the Proposed Development with reference to human health criteria and concluded, based on conservative assumptions, that the Proposed Development will not result in any off-site exceedance of the relevant ambient air quality standards.

The Noise Impact Assessment (Appendix C) prepared by AWN notes that there are a number of noise sensitive locations in the vicinity of the site. These noise sensitive locations include commercial locations in the immediate vicinity of the Proposed Development. The nearest noise sensitive residential locations (include the existing locations at approximately 325 m to the southeast at Greenhills Road, 400 m to the east at Keadeen Avenue and at approximately 520 m to the west at Forest Lawn and Forrest Drive Buildings in the immediate area of the site are commercial in nature. The Noise Impact Assessment (Appendix C) noted that the existing ambient noise levels in the area were dominated by traffic noise from the local road network. During daytime, evening and night periods existing ambient noise levels at the various noise sensitive locations are typically 10dB(A) or more above predicted noise levels associated with the proposed development and hence the existing ambient noise levels will remain unchanged during these periods.

There are no planned direct discharges to water or land, although the risk of accidental discharge or spills exists. A number of design measures are proposed to prevent the contamination of groundwater during the operational phase as described in Section 5.2.

The design of the Proposed Development has due regard of the sensitivity of the surroundings, and is not likely to adversely impact on local populations. Landscape and Visual impacts are discussed further in Section 5.6.

The residual impact of the Proposed Development with respect to populations and human health during the operational phase is ***neutral, not significant*** and ***long-term.***

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of population and human health impacts during the operational phase. Therefore a requirement for subthreshold EIA does not arise.

5.2 LAND, SOILS, GEOLOGY, HYDROGEOLOGY, HYDROLOGY

5.2.1 Construction Phase (incl. Demolition)

Potential for increased sediment and runoff from excavation, soil handling, removal and compaction

Excavations will be required for construction phase operations to facilitate the installation of services. The quantity of excavated soil, stone and made ground that will be generated has been estimated by CSEA to be 600 m^3. There will be no increase in impermeable surfaces as a result of the Proposed Development.

Run-off water containing silt will be contained on-site via settlement tanks and treated to ensure adequate silt removal. Silt reduction measures on site will include a combination of silt fencing, settlement measures (silt traps, silt sacks and settlement tanks / ponds).

Movement of material will be minimised to reduce the degradation of soil structure and generation of dust. Excavations will remain open for as little time as possible before the placement of fill. This will help to minimise the potential for water ingress into excavations. Soil from works will be stored away from existing drainage features to avoid any potential impact.

The site preparation, excavations and levelling works required to facilitate the installation of services will require excavation of topsoil, soil and stone. It is currently proposed to dispose of all excavated material off-site.

All excavated materials will be visually assessed by a suitably qualified person appointed by the construction contractor 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 excavated material is contaminated, this will be disposed of by a licensed waste disposal contractor.

Stockpiles of soil and construction aggregate can 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 in accordance with CIRIA (2005), *Environmental Good Practice on Site* (C650); Construction Industry Research and Information Association.

In respect of the foregoing, and the measures set out in the CEMP prepared by CSEA (2022b), the residual impact as a result of the potential for increased sediment and runoff from excavation works on, land, soils, geology, hydrogeology, and hydrology during construction is considered to be ***negative, imperceptible*** and ***temporary*** *(effects lasting less than a year).*

Potential for contamination from Accidental Spills and Leaks

There is potential for water (rainfall and/or discontinuous perched groundwater) to become contaminated with pollutants associated with construction activity. Contaminated water which arises from construction sites can pose a significant short-term risk to water quality for the duration of the construction if contaminated water is allowed percolate to the aquifer or accidental discharges into surface water.

Machinery activities on site during the construction phase may result in run off of contaminated waters into surface water networks or ground water. Potential impacts could arise from accidental spillage of fuels, oils, paints, cement, etc. which could impact surface water if allowed to runoff into surface water systems and/or receiving watercourses or groundwaters.

- The potential impacts during the construction phase are required to be mitigated by ensuring best practice construction with respect to storage of any hazardous substances (fuels, chemicals and other construction materials that may pose a risk to the environment). The project specific CEMP prepared by CSEA (2022b) sets out these best practice construction methodologies to manage the risk of accidental spills and leaks in accordance with CIRIA (2005), *Environmental Good Practice on Site*

(C650); Construction Industry Research and Information Association; and BPGCS005, *Oil Storage Guidelines.*

In respect of the foregoing, the residual impact in respect of the potential for impacts related to contamination from accidental spills on, soils, geology, hydrogeology, and hydrology during construction is considered to be ***negative, imperceptible*** and ***temporary*** *(effects lasting less than a year).*

Dewatering, Run-off and Sediment Loading

There is the potential for contaminated surface water run-off from site preparation and excavations during the construction phase may contain increased silt levels or become polluted from construction activities. Silt water can arise from excavations, exposed ground, stockpiles, and access roads.

Construction water containing large amounts of silt or other contaminants such as hydrocarbons has the potential to cause negative, and short-term impacts on receiving surface water bodies, or surface water networks, if not adequately mitigated.

The CEMP prepared by CSEA (2022b) details measures to help ensure that the receiving surface water drainage network is sufficiently protected for the duration of the proposed works. The CEMP states:

> *Care will be taken to ensure that exposed soil surfaces are stable to minimise erosion. All exposed soil surfaces will be within the main excavation site which limits the potential for any offsite impacts. No significant dewatering will be required during the construction phase which would result in the localised lowering of the water table. There may be localised pumping of surface run-off from the excavations (up to 5m) during and after heavy rainfall events to ensure that the trenches are kept relatively dry.*
>
> *Any run-off water containing silt during construction will be contained on-site via settlement tanks and treated to ensure adequate silt removal. Silt reduction measures on site will include a combination of silt fencing, settlement measures (silt traps, silt sacks and settlement tanks / ponds).*
>
> *Movement of material will be minimised to reduce the degradation of soil structure and generation of dust. Excavations will remain open for as little time as possible before the placement of fill. This will help to minimise the potential for water ingress into excavations. Soil from works will be stored away from existing drainage features to avoid any potential impact.*
>
> *Stockpiles of soil and construction aggregate can 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.*
>
> *No construction shall take place within 30m of the Kingswood Stream and there shall no abstractions from the water course.*

No silty or contaminated water from the construction works will be discharged to any stormwater network, but should any discharge of contaminated construction water be required during the construction phase, the discharge will be to foul sewer following agreement with the Local Authority / Irish Water.

It is noted that these are standard construction best-practise procedures and are in no way included as mitigation to protect any European Sites.

Where dewatering is required during the construction phase, dirty water will be fully and appropriately attenuated, through silt bags, before being appropriately discharged. No silty or contaminated water from the construction works will be discharged to any stormwater network.

In respect of the foregoing, and the measures set out in the CEMP prepared by CSEA (2022b), the residual impact in respect of the potential for impacts related to dewatering on, soils, geology, hydrogeology, and hydrology during construction is considered to be ***negative, imperceptible*** and ***temporary*** *(effects lasting less than a year).*

Foul Water During Construction

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.

No silty or contaminated water from the demolition or construction works will be discharged to any stormwater network but should any discharge of contaminated construction water be required during the construction phase, the discharge will be to foul sewer following agreement with South Dublin County Council / Irish Water.

The foul water during construction (if required) will be pumped to Ringsend Waste Water Treatment Plant (WWTP) where it will be treated and discharged to the Liffey Estuary Lower. There is, therefore, an indirect pathway from the proposed development to the designated European sites at Dublin Bay (South Dublin Bay SAC, North Dublin Bay SAC, North Bull Island SPA and South Dublin Bay and River Tolka Estuary SPA).

With due consideration to the characteristics of the Proposed Development and the Site location, there are no likely potential significant impacts of the Proposed Development in relation to foul water during construction, under the environmental factor of land, soils, geology, hydrogeology, and hydrology.

Conclusions

Having regard to the foregoing, there is no real likelihood of significant effects on the environment arising from the Proposed Development in respect of land, soils, geology, hydrogeology and hydrology impacts during the construction phase. Therefore, a requirement for sub-threshold EIA does not arise.

5.2.2 Operational Phase

Direct and Indirect Discharges Management

The proposed surface water network for the development collects runoff from roofs, roads and other hard standing areas in a sealed system of pipes and gullies. In addition to this, discharge from humidifiers and air conditioning units are collected and discharge into a surface water pipe external to the building. The pipe network outfalls to 3 no. surface water attenuation systems located to southwest, south and east of the main building. The proposed attenuation systems outfall via carrier drains which discharge attenuated flows to the existing M50 Business Park surface water drainage system. The design of the stormwater drainage network for the Proposed Development has taken cognisance of the guidelines and requirements set out by the Greater Dublin Strategic Drainage Strategy (GDSDS) and the draft South Dublin County Council (SDCC) Sustainable Drainage Explanatory Design & Evaluation Guide (2022), which requires all new developments to incorporate the principles of Sustainable Urban Drainage Systems (SuDS). The proposed SuDS methods as set out in Engineering Services Report Drainage and Water Services prepared by CSEA (2022a) will ensure that no negative impacts to stormwater leaving the Site will arise due to the attenuation measures planned, with the proposal improving the water environment at the location. The maximum allowable discharge for the site is 1.73 l/s at a design head of 2.0m. Discharge from the site will be controlled by means of an online hydrobrake vortex control.

There will be no increase on existing wastewater or industrial wastewater demand as set out in the Engineering Services Report Drainage and Water Services prepared by CSEA (2022a), as a result of the Proposed Development. The existing foul sewer pumping station will be retained and reconfigured to serve new rising main, located to the north of the building. The disposal of foul water from the site is separated from that of surface water.

The drainage of surface water and disposal of foul water is detailed further within the accompanying Engineering Services Report Drainage and Water Services prepared by CSEA (2022a).

The residual impact on land, soils, geology, hydrogeology, and hydrology during operation is considered to be ***neutral, imperceptible*** and ***long term.***

Increase in Hardstand

There will be no increase in hardstand as a result of the Proposed Development as set out in Engineering Services Report Drainage and Water Services prepared by CSEA (2022a). Therefore it is considered that there is no change to local groundwater recharge as a result of the Proposed Development.

Conclusions

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of land, soils, geology, hydrogeology and hydrology impacts during the operational phase. Therefore a requirement for sub-threshold EIA does not arise.

5.3 BIODIVERSITY

5.3.1 Construction Phase (incl. Demolition)

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 AA Screening and Ecological Assessment (EcIA) that have been prepared by the Moore Group and included with the planning documentation.

The site exists as a warehouse building, including two ancillary two-storey offices, a security hut and hard standing carpark. The site is commercial-industrial in nature and has little value in terms of biodiversity. 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.

The EcIA (Moore Group 2022a) concludes there were no rare or protected habitats or species recorded on the site and there were no records of invasive species. The habitats under the footprint of the area proposed for the development are of low local ecological value.

The AA Screening Report (Moore Group 2022b) concludes that:

> *It has been objectively concluded by Moore Group Environmental Services that:*
>
> 1. *The Proposed Development is not directly connected with, or necessary to the conservation management of the European sites considered in this assessment.*
>
> 2. *The Proposed Development is unlikely to significantly affect the Qualifying interests or Conservation Objectives of the European sites considered in this assessment.*
>
> 3. *The Proposed Development, alone or in combination with other projects, is not likely to have significant effects on the European sites considered in this assessment in view of their conservation objectives.*
>
> 4. *It is possible to conclude that there would be no significant effects, no potentially significant effects and no uncertain effects if the Proposed Development were to proceed.*
>
> *It can be excluded, on the basis of objective information, that the Proposed Development, individually or in combination with other plans or projects, will have a significant effect on a European site.*

Cutting vegetation should be caried out outside the bird nesting season (March 1st to August 31st) to avoid potential impacts on birds. Where cutting vegetation within that season is required, it will be undertaken under the supervision of a suitable qualified ecologist to ensure any birds nests are identified and avoided, and lighting at all construction stages will be done in a sensitive manner, directed inwards with no external spill, on site with no significant direct lighting outside of the proposed site.

On the basis of the above with regard to the evidence set out within the EcIA, Bat Survey Report, and AA Screening Report the potential effects on local biodiversity and ecology are ***neutral, imperceptible*** and ***temporary*** *(effects lasting less than a year)* for the construction phase.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of biodiversity impacts during the construction phase. Therefore a requirement for EIA does not arise.

5.3.2 Operational Phase

The operational phase of the Proposed Development is not predicted to have any impact on biodiversity.

As set out in the Bat Fauna Survey (Appendix B (ii)) no bats were noted on site. No bats were noted roosting on site. No trees of bat roosting potential are noted on site. The site is brightly lit both internally and externally. Security lighting is on site and in neighbouring industrial properties which create a brightly lit environment. No bats were noted on site. No confirmed bat roosts will be lost.

Given that no bat species were found using the site and the site is brightly lit from within and externally, the proposed project will not have any significant effect on local bat populations. No bat roosts or potential bat roosts will be lost due to this development. The proposed development is not in proximity to sensitive bat areas. The project is within a brightly lit industrial estate. The potential for collision risk and impact on flight paths in relation to bats is considered is considered low due to the low level of bat activity on site and the buildings would be deemed to be clearly visible to bats.

The existing woodland northern boundary belt is to be bolstered with additional native tree planting and understory species.

The EclA (Moore Group 2022a) concludes that '*There are no predicted significant effects from the proposed development on habitats, flora, fauna or biodiversity*'..

On the basis of the above with regard to the evidence set out within the EclA, Bat Survey Report, and AA Screening Report the potential effects on local biodiversity and ecology are ***neutral, imperceptible*** and ***long term*** for the operation phase.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of biodiversity impacts during the operational phase. Therefore a requirement for EIA does not arise.

5.4 AIR QUALITY AND CLIMATE

In relation to climate, the Climate Action and Low Carbon Development (Amendment) Act 2021 (the 2021 Climate Act) (No. 32 of 2021) was published in July 2021. The purpose of the 2021 Climate Act is to provide for the approval of plans 'for the purpose of pursuing the transition to a climate resilient, biodiversity rich and climate neutral economy by no later than the end of the year 2050'. The 2021 Climate Act will also 'provide for carbon budgets and a sectoral emissions ceiling to apply to different sectors of the economy'. The 2021 Climate Act removes any reference to a national mitigation plan and instead refers to both the Climate Action Plan, as published in 2019, and a series of National Long Term Climate Action Strategies. In addition, the Environment Minister shall request each local authority to make a 'local authority climate action plan' lasting five years and to specify the mitigation measures and the adaptation measures to be adopted by the local authority. The Act has set a target of a 51% reduction in the total amount of greenhouse gases over the course of the first two carbon periods ending 31 December 2030 relative to 2018 annual emissions. The 2021 Climate Act defines the carbon budget as 'the total amount of greenhouse gas emissions that are permitted during the budget period'

The Climate Action and Low Carbon Development (Amendment) Act 2021 (No. 32 of 2021) outlines a series of specific actions including:

- To make a strategy to be known as the 'National Long Term Climate Strategy' not less than once in every five-year period with the first to be published for the period 2021 to 2035 and with each subsequent Strategy covering the next three five-year carbon budgets and also include a longer term perspective of at least 30 years;
- To adopt a system of carbon budgets which will be determined as part of a grouping of three five-year periods calculated on an economy-wide basis, starting with the periods 2021 to 2025, 2026 to 2030, and 2031 to 2035;
- To introduce a requirement for Government to adopt "sectoral emission ceilings" for each relevant sector within the limits of each carbon budget;
- To request all local authorities to prepare climate action plans for the purpose of contributing to the national climate objective. These plans should contain mitigation and adaptation measures that the local authority intends to adopt;
- Increasing the power of the Advisory Council to recommend the appropriate climate budget and policies;
- Requiring the Minister to set out a roadmap of actions to include sector specific actions that are required to comply with the carbon budget and sectoral emissions ceiling for the period to which the plan relates; and
- Reporting progress with the CAP on an annual basis with progress including policies, mitigation measures and adaptation measures that have been adopted.

The 2021 Climate Action Plan (CAP) (Government of Ireland, 2021) provides a detailed plan for taking decisive action to achieve a 51% reduction in overall greenhouse gas emissions by 2030 and setting us on a path to reach net-zero emissions by no later than 2050, as committed to in the Programme for Government and set out in the Climate Act 2021. The plan outlines the current status across key sectors including Electricity, Transport, Built Environment, Industry and Agriculture and outlined the various broadscale measures required for each sector to achieve ambitious decarbonisation targets. CAP 2021 also detailed the required governance arrangements for implementation including carbon-proofing of policies and establishment of sectoral emission ceilings and carbon budgets. In relation to data centres, the CAP 2021 provides that emissions from industry sectors covered by the ETS are subject to EU-wide rather than national targets set out under EU Effort Sharing Decision. Box 2.1 states:

"emissions from electricity generation and large industry in the ETS are subject to EU-wide targets which require that emissions from these sectors be reduced by 43% by 2030, relative to 2005 levels".

As part of the preparation of a 'local authority climate action plan', each local authority shall consult and co-operate with an adjoining local authority in making a local authority climate action plan and co-ordinate the mitigation measures and adaptation measures to be adopted, where appropriate. Each local authority is also required to consider any significant effects the implementation of the local authority climate action plan may have on the adjoining local authority.

5.4.1 Construction Phase (incl. Demolition)

Construction stage traffic and embodied energy of construction materials are expected to be the dominant source of greenhouse gas emissions as a result of the demolition and construction phase of the development. Construction vehicles, generators etc., may give rise to CO_2 and N_2O emissions. The Institute of Air Quality Management document *'Guidance on the Assessment of Dust from Demolition and Construction'* states that site traffic and plant is unlikely to make a significant impact on climate. Due to the temporary duration of these works, the impact on climate will be ***not significant***, and ***temporary*** *(effects lasting less than a year)*.

Nevertheless, some site-specific mitigation measures will be implemented during the demolition and construction phase of the Proposed Development to ensure emissions are reduced further. In particular the prevention of on-site or delivery vehicles from leaving engines idling, even over short periods. Minimising waste of materials due to poor timing or over ordering on site will aid to minimise the embodied carbon footprint of the site. The prepared CEMP that includes these measures will ensure that the measured outlined above are implemented.

The greatest potential impact on air quality during the demolition and construction phase of the Proposed Development is from construction dust emissions and the potential for nuisance dust and $PM_{10}/PM_{2.5}$ emissions. While construction dust tends to be deposited within 350 m of a construction site, the majority of the deposition occurs within the first 50 m based on Transport Infrastructure Ireland (TII) guidance (2011).

The pro-active control of fugitive dust will ensure the prevention of significant emissions, rather than an inefficient attempt to control them once they have been released. The main contractor will be responsible for the coordination, implementation and ongoing monitoring of the dust control measures set out in the CEMP. The key aspects of controlling dust are listed below. These measures are incorporated into the CEMP prepared by CSEA (2022b) prepared for the Site.

In summary the measures which will be implemented will include:

- A speed restriction of 20 km/hr shall be applied as an effective control measure for dust for on-site vehicles
- Access gates to the site shall be located at least 10m from sensitive receptors where possible.
- Bowsers or suitable watering equipment will be available during periods of dry weather throughout the construction period.
- Hard surface roads will be swept to remove mud and aggregate materials from their surface while any unsurfaced roads will be restricted to essential site traffic.
- During dry and windy periods, and when there is a likelihood of dust nuisance, watering shall be conducted to ensure moisture content of materials being moved is high enough to increase the stability of the soil and thus suppress dust.
- During periods of very high winds (gales), activities likely to generate significant dust emissions should be postponed until the gale has subsided.
- Overburden material will be protected from exposure to wind by storing the material in sheltered regions of the site, where possible.
- Regular watering will take place during dry/windy periods to ensure the moisture content is high enough to increase the stability of the soil and suppress dust.

- Where feasible, hoarding will be erected around site boundaries. This will have the benefit of reducing the impact of larger particles on nearby sensitive receptors.
- Material handling systems and site stockpiling of materials will be designed and laid out to minimise exposure to wind. Water misting or sprays will be used as required if particularly dusty activities such as rock blasting or earthworks are necessary during dry or windy periods.
- At the main site traffic exits, a wheel wash facility shall be installed if feasible. All trucks leaving the site must pass through the wheel wash.
- Vehicles delivering or collecting material with potential for dust emissions shall be enclosed or covered with tarpaulin at all times to restrict the escape of dust.
- Public roads outside the Site shall be regularly inspected for cleanliness, as a minimum on a daily basis, and cleaned as necessary.

At all times, these procedures will be strictly monitored and assessed. In the event of dust nuisance occurring outside the Site boundary, movements of materials likely to raise dust would be curtailed and satisfactory procedures implemented to rectify the problem before the resumption of construction operations.

During construction, the Proposed Development will give rise to dust in the short term. Mitigation measures proposed in the CEMP included as Appendix G to this report will ensure dust suppression techniques so as to remain within acceptable levels. These include road sweeping, wheel washing and covered vehicles.

The residual effects on air quality and climate will be ***temporary*** *(effects lasting less than a year),* ***slight*** and ***negative*** during the demolition and construction phase.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of air quality impacts during the demolition and construction phase. Therefore, a requirement for sub-threshold EIA does not arise.

5.4.2 Operational Phase

An Air and Climate Impact Assessment has been undertaken by AWN Consulting and included in Appendix D. The assessment was carried out to determine the potential air quality impacts for the Proposed Development. There will be a backup generator on site which will provide emergency backup power to the site Air dispersion modelling of nitrogen dioxide (NO_2) emissions was carried out using the United States Environmental Protection Agency's regulated model AERMOD. AERMOD is the model recommended by the EPA in their guidance document "Air Dispersion Modelling From Industrial Installations Guidance Note – AG4 " (EPA, 2020). The modelling of air emissions from the site was carried out to assess concentrations of NO_2 at a variety of locations beyond the site boundary.

A number of modelling scenarios were investigated for the purposes of this assessment. Both normal day-to-day testing operations were considered as well as emergency operations and testing operations

Throughout the Air and Climate Impact Assessment study a worst-case approach was taken. This will most likely lead to an over-estimation of the levels that will arise in practice. The worst-case assumptions are outlined below:

- Maximum predicted concentrations are reported in this study, even if no residential receptors are near the location of this maximum;

- Conservative background concentrations are used in the assessment;
- The effects of building downwash, due to on-site buildings, are included in the model;
- Emergency operations were assumed to occur for a maximum of 72 hours per year calculated according to USEPA methodology, in reality the generator is likely to be used for maintenance and testing purposes only.

The results of the modelling study indicate that the ambient ground level concentrations are in compliance with the relevant air quality standards for NO_2. For the worst-case year, emissions from the site lead to an ambient NO_2 concentration (including background) which is 36% of the maximum ambient 1-hour limit value (measured as a 99.8th percentile) and 45% of the annual limit value at the worst-case off-site receptor.

The modelling also investigated how many hours the generator could operate before there was a risk of an exceedance of the ambient air quality standards for NO_2. The modelling found that the generator could operate for the full year without exceeding the ambient air quality standards for NO_2.

On the basis of the above with regard to the evidence set out within the Air and Climate Impact Assessment the potential effects on Air Quality are ***negative, imperceptible,*** and ***long-term*** for the operational phase.

Section 6.4 of the Air and Climate Impact Assessment assessed that on the basis that the Proposed Development will consume 1.3 MW of power this equates to 11.4 GWh annually based on the assumption of the national fuel mix based on 2021 SEAI data. This translates to approximately 3,370 tonnes of CO_2eq per year which will have an ***indirect, long-term, negative*** and ***slight*** impact on climate.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of air quality and climate change impacts during the operational phase. Therefore a requirement for EIA does not arise.

5.5 NOISE AND VIBRATION

A site-specific Noise Impact Assessment Appendix C has been prepared by AWN Consulting, this is provided as (Appendix C to this report. This report has included the following:

- Review appropriate guidance and standard documents relating to environmental noise, typical local authority planning conditions, etc. in order to identify appropriate noise criteria for the construction phase of the development and site operations;
- A description of the existing noise climate captured through environmental noise surveys at locations representative of the nearest noise sensitive locations to the development site;
- Description of noise modelling assessment relating to operational phase;
- Assessment of predicted levels against the appropriate criteria and existing noise levels and the required mitigation measures, presented in Table 14 of the Noise Impact Assessment in Appendix C.
- A review of typical construction noise and vibration limits

5.5.1 Construction Phase (incl. Demolition)

With refence to Noise Impact Assessment in Appendix C during the construction phase it is expected that there will be some temporary impact on the nearest commercial and industrial properties due to noise emissions from the plant equipment required for construction.

However, given that the construction phase of the development is temporary *(lasting less than a year)* in duration, it is expected that the various noise sources will not be excessively intrusive. Furthermore, the application of binding hours as set down by planning conditions for construction, along with implementation of appropriate noise and vibration control measures, will ensure that noise and vibration impact is kept to a minimum. From Section 7.1 of the Noise Impact Assessment in Appendix C:

Specific examples of such measures are:

- *limiting the hours during which site activities likely to create high levels of noise or vibration are permitted (for example, as in paragraph 6(a) of the planning conditions Ref SD18A/0301);*
- *establishing channels of communication between the contractor/developer, Local Authority and residents;*
- *appointing a site representative responsible for matters relating to noise and vibration;*
- *monitoring levels of noise and/or vibration during critical periods and at sensitive locations; and*
- *all site access roads will be kept even so as to mitigate the potential for vibration from lorries.*

Furthermore, it is envisaged that a variety of practicable noise control measures will be employed. These may include:

- *selection of plant with low inherent potential for generation of noise and/ or vibration;*
- *erection of barriers as necessary around items such as generators or high duty compressors;*
- *situate any noisy plant as far away from sensitive properties as permitted by site constraints and the use of vibration isolated support structures where necessary*

The CEMP sets out these mitigation measures to ensure nuisance noise 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.

On the basis of the above with regard to the evidence set out within the Noise Impact Assessment the potential effects on noise and vibration are ***negative, minor temporary*** *(effects lasting less than a year)* for the construction phase. There are no likely significant effects in terms of Noise and Vibration, and it would not warrant preparation of an EIA on these grounds.

5.5.2 Operational Phase

As outlined in the Noise Impact Assessment the existing noise environment in the vicinity of the nearest noise sensitive locations is dictated by local and distant road

traffic movements with a degree of existing plant noise becoming more apparent during night-time periods. The primary noise during the operational phase is associated with building services noise, emergency site operations and additional vehicular traffic on public roads.

The noise model predictions (Appendix C) conclude the following:

- *Scenario A: Day to Day Operations* – The figures presented in the Noise Impact Assessment indicate that the predicted noise levels at the various noise sensitive locations identified in the vicinity of the site satisfy the adopted criteria outlined in the relevant sections of this assessment.

- *Scenario B: Emergency Operations* – The modelling has indicated that noise emissions associated with emergency operations are within the relevant emergency operation limits, in the rare event that a power loss to the site occurs.

- *Scenario C: Generator Testing* – The modelling has indicated that noise emissions associated with generator testing are within the adopted daytime criterion when these activities will take place. Testing typically takes place for a period of 1 hour, one time per month.

The predicted noise levels are presented in Table 13 on the Noise Impact Assessment (Appendix C). The noise levels for the various scenarios are compared against the applicable criteria in Table 14. Noise levels are within criteria in all cases.

Finally Table 15 and Table 16 present a review of the predicted increases in noise level for residential locations assessed. The increase in noise levels in all cases is imperceptible.

On the basis of the above, with regard to the evidence set out within the Noise Impact Assessment in Noise Impact Assessment Appendix C, the potential effects on the noise and vibration environment are ***imperceptible*** and ***long term*** for the operational phase. There are no likely significant effects in terms of Noise and Vibration, and it would not warrant preparation of an EIA on these grounds.

5.6 LANDSCAPE AND VISUAL IMPACT

5.6.1 Construction Phase (incl. Demolition)

The change of use of the site from its existing use to that of a construction site will give rise to short term and substantially localised effects on landscape character. There will be a slight disruption to the existing Landscape/Townscape pattern as the proposed development will result in the removal of some vegetation and the planting and maturation of others, as well as a relatively modest alteration to the infrastructure within the site. The initial construction operations will give rise to temporary *(effects lasting less than a year)* impacts on the landscape character, through the introduction of new structures, machinery, ancillary works etc.

The residual impact on landscape and visual impact during construction will be ***temporary*** *(effects lasting less than a year)* and will be ***moderate*** and ***neutral to negative***.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of landscape and visual impacts during the demolition and construction phase. Therefore, a requirement for sub-threshold EIA does not arise.

5.6.2 Operational Phase

The Proposed Development comprises a change of use from a warehouse unit to a data repository facility.

The Landscape and Visual Impact Assessment (LVIA) prepared by Macroworks (Appendix F (ii)) that relates to assessing effects of a development on the Landscape/Townscape as a resource in its own right and is concerned with how the proposal will affect the elements that make up the Landscape/Townscape, the aesthetic and perceptual aspects of the Landscape/Townscape and its distinctive character.

The LVIA (Appendix F (ii)) concludes that based on the Landscape/Townscape and Visual impact judgements provided throughout the LVIA, the Proposed Development is not considered to give rise to any significant Landscape/Townscape or Visual impacts.

The predicted impact on landscape and visual impact during operation is ***neutral, slight to imperceptible*** and ***permanent.*** There are no likely significant effects in terms of the Landscape and Visual Impact during operation that would warrant preparation of an EIA.

5.7 ARCHAEOLOGY, ARCHITECTURE AND CULTURAL HERITAGE

5.7.1 Construction Phase (incl. Demolition)

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. In addition, a review of the SDCC South Dublin County Development Plan 2022-2028 confirms that there are no protected structures within the Proposed Development lands.

The demolition and 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.

In this regard any impacts upon cultural heritage and archaeological are considered to be ***neutral, imperceptible*** and ***long term*** in nature.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of cultural heritage and archaeology during the demolition and construction phase. The residual effect is not significant, and therefore a requirement for sub-threshold EIA does not arise.

5.7.2 Operational Phase

The operational phase of the Proposed Development is not predicted to have any impact on archaeological, architectural and cultural heritage.

In this regard any impacts upon cultural heritage and archaeological are considered to be ***neutral, imperceptible*** and ***long term*** in nature.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of cultural heritage and archaeology impacts during the operational phase. Therefore a requirement for sub-threshold EIA does not arise.

5.8 TRAFFIC AND TRANSPORTATION

5.8.1 Construction Phase (incl. Demolition)

During the demolition and 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).

Construction traffic has been estimated by CSEA (2022) using data obtained from a similar data repository facility development that used a similar construction methodology to the current development. The following construction data has been used to estimate peak daily construction traffic:

- Average construction staff for data repository facility: 25;
- Peak construction staff for data repository facility: 40;
- Average cars/ day for data repository facility: 25;
- Peak cars/day for data repository facility: 40
- Peak HGVs/day for data repository facility: 10; and

Peak LGVs/ day for one data repository facility: Access to the site during construction will be via the internal Business Park Road and existing entrance as set out in Figure 3.1. There is car parking located at the southern corner of the site, south-west of the warehouse structure.

The frequency of vehicles accessing the site will vary throughout the demolition and construction phase. A site-specific construction traffic management plan incorporating the mitigation measures set out under the CEMP will be prepared by the contractor and submitted to the planning authority prior to the commencement of construction.

Following the implementation of mitigation measures the potential impacts on Traffic and Transportation are ***negative, moderate,*** and ***temporary*** *(effects lasting less than a year)* for the demolition and construction phase.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of traffic and transportation impacts during the demolition and construction phase. Therefore, a requirement for sub-threshold EIA does not arise.

5.8.2 Operational Phase

Access to the site is via the internal Business Park Road with two existing entrances providing access to the car park and to the delivery yard. There is car parking located at the southern corner of the site, south-west of the warehouse structure. The Proposed Development will provide 22 parking spaces including 2 electrical vehicle charging points, bicycle parking shelter. The existing site has 24 parking spaces. Access to the Proposed Development will be via the existing access located to the east of the site, off the estate road.

Vehicles will access the development via an existing M50 Business Park private road, which forms a T-junction with Ballymount Road Upper. Traffic to and from the site is not expected to increase as a result of the Proposed Development.

On the basis of the above, the potential effects on Traffic and Transportation are ***neutral, imperceptible*** and ***long term*** for the operational phase. Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of traffic and transportation during the operational phase. Therefore, a requirement for EIA does not arise.

5.9 MATERIAL ASSETS AND WASTE

5.9.1 Construction Phase (incl. Demolition)

Utilities: Electricity, Foul Sewer, Stormwater and Potable Water

Welfare facilities (canteens, toilets etc.) will be required for the construction phase. Site welfare facilities will be established to provide sanitary facilities for construction workers on site. The main contractor will ensure that sufficient facilities are available at all times to accommodate the number of employees on site. As the site is fully serviced with existing connections for electricity, foul sewer, stormwater and potable water. it is envisaged that the existing foul water drainage network will be used during the construction phase.

There is an existing connection agreement in place with ESB to supply power for the proposed development. Electrical connections will be made by suitably qualified personnel following consultation with the relevant authorities and will be cognisant of subsequent construction works. High voltage connections will be established for heavy duty equipment and site facilities, as required. All electrical works, including connection to the ESB network will be carried out by a suitably qualified contractor. The power and electrical supply requirements during construction are relatively minor, and there is no potential impact anticipated on existing users

Water supply required for welfare facilities, dust suppression and general construction activities will be sourced from the existing public piped supplies running into the site. Although before connections are established to the water supply it may need to be trucked onto site. As with electrical works, this will be carried out by a suitably qualified contractor. It will be necessary to service the Site with a reliable and safe water supply.

In respect of the foregoing, the predicted impacts upon foul sewer, stormwater and potable water are considered to be ***neutral, imperceptible*** and ***temporary*** *(effects lasting less than a year)* .

Waste and Waste Management

There will be waste materials produced in the construction of the proposed scheme which will be disposed of using licensed waste disposal facilities and contractors. 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.

Waste during construction will be managed in accordance with the project specific RWMP (Appendix E) and the CEMP prepared by CSEA (2022b), as well as any subsequent planning conditions.

Other than waste generated from materials necessary for the construction of the building the Proposed Development will not produce significant volumes of waste.

All waste arising during the demolition and construction phase will be managed and disposed of in accordance with the RWMP (Appendix E), that will ensure compliance with the provisions of the Waste Management Act 1996 as amended and associated amendments and regulations and the EMR Waste Management Plan 2015-2021. In the event there is excess material with no defined purpose, it will be transported to an authorised soil recovery site or notified to the EPA as a by-product when it will be beneficially used.

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 ***neutral imperceptible,*** and ***temporary*** *(effects lasting less than a year).*

Material Assets Conclusions

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of material assets impacts during the demolition and construction phase. Therefore, a requirement for sub-threshold EIA does not arise.

5.9.2 Operational Phase

Utilities: Electricity, Foul Sewer, Stormwater and Potable Water

The Proposed Development will consume 1.3 MW of power once fully operational. There is an existing connection agreement in place with ESB to supply power for the proposed development. The power requirements for the proposed development will be provided via 1 x Medium Voltage (MV) cable connection from the existing ESB substation (permitted and constructed under an existing permission) located immediately adjacent to the development site to the West. The proposed development includes the provision of a single-story client control switchgear room which will adjoin the existing ESB substation.

There is a fibre optic cable distribution network is located adjacent the site there is sufficient capacity in the network for the Proposed Development.

Water supply and wastewater will be provided via the existing public mains network. The disposal of foul water from the site is separated from that of surface water.

The existing water infrastructure within the area has been confirmed to have adequate capacity to cater for the Proposed Development. Details of the confirmation with Irish Water is included with the Engineering Services Report Drainage and Water Services submitted as part of the planning application for the Proposed Development.

The proposed foul water demand has been calculated by CSEA (2022a) as the estimated proposed average wastewater demand is 1,100 l/day. The existing average permitted wastewater demand is 1,200 l/day. There will be no increase on existing demand as a result of the Proposed Development. The existing foul sewer pumping station will be retained and reconfigured to serve new rising main, located to the north of the building. The disposal of foul water from the site is separated from that of surface water.

Surface water discharge from the Proposed Development will be regulated by a flow control device (hydrobrake). The critical storm event occurs during the 1440 minute of the 1 in 100 year storm event for which 517.909 m^3 of surface water attenuation storage is required. It is proposed that total storage of 526.49 m^3 is provided which is greater than the critical required storage volume of 517.909 m^3. One existing bypass separator will be retained, and new full retention is to be provided due to refuelling on site. Details of the proposed Attenuation System are indicated on 22_112-CSE-00-XX-DR-C-2112 Proposed Surface Water Attenuation System General Arrangement.

The existing site's internal network has no provision for surface water attenuation. Therefore, the proposed development and proposed attenuation as set out in the Engineering Services Report Drainage and Water Services prepared by CSEA (2022a) represents an improvement to the management of surface water at the site.

The facility is designed to use humidifiers and air conditioning systems to maintain the relative humidity and temperature in the internal building space. When ambient temperature exceeds the allowable internal space temperature, air conditioning systems in the admin area will mechanically reject heat from the space. During this process, condensed water can collect in the air conditioning systems and will drain to the surface network.

The predicted impacts are neutral, imperceptible and long term in respect of foul sewer, stormwater and potable water.

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. The majority of waste will be generated from packaging for equipment deliveries to the facility which is likely to be at its peak in the early months of operation.

The potential impacts on the environment of improper, or a lack of, waste management during the operational phase would be a diversion from the priorities of the waste hierarchy which would lead to small volumes of waste being sent unnecessarily to landfill.

Networks of waste collection, treatment, recovery and disposal infrastructure are in place in the region to manage waste efficiently from this type of development. Waste which is not suitable for recycling is typically sent for energy recovery. There are also facilities in the region for segregation of municipal recyclables which is typically exported for conversion in recycled products (e.g. paper mills and glass recycling).

If waste materials are not managed and stored correctly, it is likely to lead to litter or pollution issues at the development site and in adjacent areas. The knock-on effect of litter issues is the presence of vermin in affected areas. The use of non-permitted waste contractors or unlicensed facilities could give rise to inappropriate management of waste and result in negative environmental impacts or pollution.

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). 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.

During the operational phase, a structured approach to waste management and abidance of European, regional and local legislation and guidance documents including *Waste Management Act 1996*, as amended, associated Regulations, the *Litter Pollution Act 1997* and the *EMR Waste Management Plan (2015 – 2021)* will promote resource efficiency and waste minimisation.

The predicted impact of the operational phase on the environment will be ***long-term, neutral*** and ***imperceptible.***

Material Assets Conclusions

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the Proposed Development in respect of material assets during the operational phase. Therefore a requirement for EIA does not arise.

5.10 ASSESSMENT OF POTENTIAL IMPACTS FROM 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 (including demolition) and operational phases 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 interaction between land, soil geology, hydrogeology and hydrology if surface water run-off was poorly managed during the construction phase of the Proposed Development.

There is a potential for interactions between air quality during construction activities on human health and biodiversity via dust generation.

There is a potential for interactions between noise and vibration during construction activities on human health.

However, these potential interactions are ***temporary*** *(effects lasting less than a year)* and associated with the construction phase. The CEMP included as Appendix G to this report has outlined minimisation measures 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.

It is considered that there will be no likely significant interactions which would warrant preparation of an EIAR.

5.11 ASSESSMENT OF POTENTIAL FOR CUMULATIVE IMPACTS

As part of the assessment of the Proposed Development, the likelihood of potential cumulative impact of the Proposed Development has been considered with any future development (as far as practically possible) and the cumulative impacts with developments in the locality (including planned and permitted developments).

The EPA Guidelines on the Information to be contained in Environmental Impact Assessment Reports. (2022) defines cumulative impacts are those impacts that relate to incremental / additive impacts of the planned development in addition to historical, present or foreseeable future actions. Cumulative impacts can be thought of as occurring through two main pathways: first, through persistent additions or losses of the same materials or resource, and second, through the compounding effects as a result of the coming together of two or more effects.

As outlined in Section 3.2, above, an initial list of existing development has been set out and Appendix A of this report sets out notable consented developments located in proximity to the development site.

A review of the permitted projects within the vicinity of the site (Appendix A) has identified the only simultaneous construction projects capable of combining with the operational phase of the Proposed Development and likely to result in cumulative effects is Reg. Ref SD19A/0222.

5.11.1 Construction Phase

The existing warehousing and logistics units, along with the Heiton Buckley Limited site for preservation of wood (EPA Ref P0340-01), and Starrus Eco Holdings Limited (EPA Ref W0238) produce no outward emissions of environmental significance that may be capable of combining with the Proposed Development to result in cumulative effects.

The Licenced waste disposal activities Starrus Eco Holdings Limited (Ballymount) (EPA Ref W0039), and Ballymount Baling Station (EPA Ref W0003), produces dust and noise emissions that may be capable of combining with the Proposed Development to result in cumulative effects.

The Air and Climate Impact Assessment (AWN, 2022) has considered the potential for cumulative effects and considers that *'There is one development on the neighbouring site to the south, Ref. SD19A/0222, which has been granted but not yet constructed. The development contains an extension to an existing warehouse. Should the construction of this neighbouring development and the proposed development overlap, cumulative construction impacts will not be significant as the proposed development will undertake the construction dust mitigation measures which have been outlined in Section 7.1 leading to a neutral, short-term and not significant impact'.*

The Noise Impact Assessment (AWN, 2022) has considered the potential for cumulative effects and considers that there is one development on the neighbouring site to the site, Reg. Ref.: SD19A/0222, that has been granted permission but not yet constructed, This site has potential to be constructed at the same time as the proposed development. The planning conditions for SD19A/0222 refer to construction noise; once the site complies with planning conditions (Condition 11 as set out below) in this regard, significant cumulative effects are not considered likely.

There is potential for cumulative effects, in respect of traffic, noise and dust, during a simultaneous construction phase with the permitted development Reg. Ref.: SD19A/0222; the Proposed Development comprises the construction of a new 1,269 m^2 warehouse extension with ancillary trading area; offices; staff site entrance; reconfiguration of existing car park and other associated minor site works to existing 4,569 m^2 warehouse with existing ancillary showrooms and offices (including limited telemarketing use) at M50 Business Park, Ballymount, Dublin 12. Mitigation measures are included in the design of this permitted development and pertinent conditions as outlined in the Grant of Permission are set out below:

- Condition 3 of the permitted development Reg. Ref.: SD19A/0222 requires that water supply and drainage infrastructure shall comply with the requirements of Irish Water.
- Condition 10 requires the management of dust during construction to minimise air blown dust during construction and demolition by employing best practicable measures. Condition 10 also requires that the development comply with B.S, 5228 Noise control on Construction and Open sites, and BS.S. 6187 Code of practice for demolitions.
- With respect to construction noise, Condition 11 requires that the applicant or developer shall comply with S.I. No. 140/2006 – Environmental Noise Regulations 2006 and BS 5228:2009 Noise and Vibration Control on Construction and Open Sites, and have regard to the World Health Organisation (WHO) – Guidelines for Community Noise. Condition 11 also requires that no equipment or machinery that could give rise to unacceptable levels of noise pollution shall be operated on the site before the hours of 07:00 on weekdays, and 09:00 on Saturdays, nor after 19:00 hours on weekdays and 13:00 hours on Saturdays, nor at any time on Sundays, Bank Holidays or Public Holidays.
- Condition 12 requires that all construction waste arising from the development of the site as approved shall be managed in accordance with a site-specific Construction Waste Management Plan including methods and locations to be employed for the prevention, minimisation, recovery and disposal of this material in accordance with the provision of the Eastern Midlands Region Waste Management Plan. Condition 12 also requires that this plan be informed by a Construction Traffic Management Plan.

The implementation of the mitigation measures required by planning conditions for this permitted development, along with the mitigation measures for the Proposed Development, will ensure that cumulative impacts will not be significant. 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.

5.11.2 Operational Phase

The Heiton Buckley Limited site for preservation of wood (EPA Ref P0340-01), and Starrus Eco Holdings Limited (EPA Ref W0238) produces no outward emissions of environmental significance that may be capable of combing with the Proposed Development to result in cumulative effects.

The Licenced waste disposal activities Starrus Eco Holdings Limited (Ballymount) (EPA Ref W0039), and Ballymount Baling Station (EPA Ref W0003), produces dust and noise emissions that may be capable of combining with the Proposed Development to result in cumulative effects.

The Air and Climate Impact Assessment (AWN, 2022) has considered the potential for cumulative effects and considers that:

> *'The Heiton Buckley Limited site for preservation of wood (EPA Ref P0340-01), and Starrus Eco Holdings Limited (EPA Ref W0238) produces no outward emissions of environmental significance that may be capable of combing with the proposed development to result in cumulative effects.*
>
> *The Licenced Galco Steel Limited an IPPC site (EPA Ref P0284-02) produces Lead, Zinc, Cadmium, Particulate matter, Chloride (as HCl), Ammonium Chloride Emissions to Atmosphere that are not capable of combing with the proposed development to result in cumulative effects.*
>
> *The Licenced waste disposal activities Starrus Eco Holdings Limited (Ballymount) (EPA Ref W0039), and Ballymount Baling Station (EPA Ref W0003), produces dust emissions during operation that may be capable of combining with the proposed development to result in cumulative effects.*
>
> *However, given the distance from the proposed development to these nearby facilities and given that the operational impact of emissions from the proposed development will be **long-term**, **localised**, **negative** and **slight**, no significant cumulative impacts will occur'.*

The Noise Impact Assessment (AWN, 2022) has considered the potential for cumulative effects and considers that *'the existing ambient noise levels in the area were dominated by road traffic noise from the local road network. During daytime, evening and night periods existing ambient noise levels at the various noise sensitive locations are typically 10dB(A) or more above predicted noise levels associated with the proposed development and hence the existing ambient noise levels will remain unchanged during these periods'.* In addition, the Noise Impact Assessment notes that *'As the proposed development is predicted to have an imperceptible impact at the residential locations assessed, there is therefore no likelihood of significant cumulative effects at these locations'.*

The Landscape and Visual Impact Assessment (Macroworks, 2022) has considered the potential for cumulative effects and considers that as the Proposed Development pertains to a change of use from warehouse to data repository facility in a site set within a large and busy peri-urban business park, there is a negligible likelihood of cumulative impacts arising from such a change of use. In addition, the proposed retrofitting/refurbishment will not represent any notable increase in the intensity of scale or built development within the site's immediate surroundings. The site and the main two-storey building within it, is generally well screened by near-mature trees when viewed from outside the site, resulting in a limited degree of intervisibility between it and

surrounding receptors. Similarly, the proposed/added flue stack 12.7m above ground level, as well as the proposed back-up electrical generator, new vehicular gates, pedestrian gates, turnstiles and perimeter security fence are not likely to generate any significant cumulative impacts.

The Landscape and Visual Impact Assessment (Macroworks, 2022) has considered the potential for cumulative effects and considers that there will not be any significant cumulative impacts arising from the Proposed Development in conjunction with other existing and/or consented developments.

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.

There is potential for cumulative effects, in respect of traffic, noise and dust, during a simultaneous construction phase and operational phase with the permitted development Reg. Ref.: SD19A/0222; the Proposed Development comprises the construction of a new 1269 m^2 warehouse extension with ancillary trading area; offices; staff site entrance; reconfiguration of existing car park and other associated minor site works to existing 4569 m^2 warehouse with existing ancillary showrooms and offices (including limited telemarketing use) at M50 Business Park, Ballymount, Dublin 12. Mitigation measures are included in the design of this permitted development and pertinent conditions as outlined in the Grant of Permission are set out below:

- Condition 3 of the permitted development Reg. Ref.: SD19A/0222 requires that water supply and drainage infrastructure shall comply with the requirements of Irish Water.
- Condition 9 of the permitted development Reg. Ref.: SD19A/0222 requires that noise due to the normal operation of the Proposed Development shall not exceed the daytime background level i.e. 0900-1900 by more than 10 dB (A) and shall not exceed the background level for evening and night time (currently 19:00-07:00) as determined in S.I. No. 140/2006 – Environmental Noise Regulations 2006. Clearly audible and impulsive tones at noise sensitive locations during evening and night shall be avoided irrespective of noise level.

The implementation of the mitigation measures required by planning condition for this permitted development, along with the mitigation measures set out in this report will ensure that cumulative impacts will not be significant.

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 demolition and construction phase as such any cumulative development will not have a significant effect on human health, material assets, land, soils, geology, hydrogeology, and hydrology.

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 EIAR.

6.0 FINDINGS AND CONCLUSIONS

On the basis of the evaluation set out in Section 2.0 of this document, an EIA for the Proposed Development is not mandatory. The Proposed Development is considered to be a sub-threshold development and therefore, the Planning Authority is required to assess whether the Proposed Development is likely to have significant effects on the environment in order to determine whether the submission of an EIAR is required. The information necessary to enable this screening assessment has been provided in this report, including its appendices, or in separate documents which are referenced in this report and submitted with the planning application, 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 and the need for an EIAR is documented in Sections 3.0, 4.0 and 5.0. It is considered that:

- The implementation of the mitigation measures set out in this report and the CEMP (Appendix G) will prevent potential ***temporary*** *(effects lasting less than a year)* nuisances (such as dust, noise and vibration, and traffic) and risks from the storage of any hazardous substances (fuels, chemicals and other construction materials that may pose a risk to the environment). The CEMP provides for work practices that are industry best practice measures that will be applied during the demolition and construction phase, and they are in no way included to avoid or reduce potential harmful effects to European sites.
- The proposed surface water drainage will contribute to improved retention of surface water on site and controlled discharge (Note: the SuDS features associated with the Proposed Development are not included within the design to avoid or reduce any potential harmful effects to any European sites).
- The AA Screening Report (Moore Group 2022) considered that the only sites within the zone of influence that are at risk of significant effects are 9 European sites. The closest sites are the Glenasmole Valley SAC (site code: 1209), the Wicklow Mountains SAC (site code: 2122) and the Wicklow Mountains SPA (site code: 4040). The AA Screening Report concluded that: *The Proposed Development entails use of a warehouse as a Data Repository and associated internal alterations. Therefore there are no predicted discharges to the environment and no pathways to any European sites. The Proposed Development will not result in any changes to the amount of surface water run-off from the site during operation nor will it result in any contamination of surface waters during operation and will not result in any changes in foul water arising on the site. Having considered the above, significant effects on any European sites as a result of the Proposed Development have been ruled out and, therefore, potential significant effects on European sites have been excluded at a preliminary screening stage.*
- A detailed Air and Climate Impact Assessment was completed to assess the impact of the development with reference to the protection of the environment and human health. This report concludes, on conservative assumptions, (as set out in Appendix D) that the Proposed Development will not result in any off-site exceedances of the applicable ambient air quality standards (including at the nearest residential receptors).
- The Noise Impact Assessment has assessed the potential noise impact of the development and concludes that the Proposed Development, will comply with the relevant noise criteria at noise sensitive locations (including at the nearest residential receptors).

- The Landscape and Visual Impact Assessment Report concludes that due to the low sensitivity attributed to the site and its environs, coupled with the a low-negligible magnitude of operational stage landscape/townscape impacts, the impact of the Proposed Development has *'an overall significance of no greater than Slight-imperceptible. The quality of the operational stage effects will be Neutral and Permanent in duration'.*

It is concluded having regard to the nature, scale and location of the subject site, there is no likelihood of significant effects on the environment arising from the Proposed Development on the environment (direct, indirect or cumulatively with other development) and therefore it is considered that the requirement for sub-threshold EIA does not arise.

7.0 REFERENCES

Environment Protection Agency. Guidelines on the Information to be contained in Environmental Impact Assessment Reports. EPA: 2022.

Ireland. Planning and Development Regulations, 2001 as amended.

European Union. Environmental Impact Assessment of Projects Guidance on Screening. EU Luxembourg: 2017.

European Union. Guidance on the preparation of the Environmental Impact Assessment Report. EU Luxembourg: 2017.

Department of Housing, Planning and Local Government. Guidelines for Planning Authorities and An Bord Pleanala on carrying out Environmental Impact Assessment. DHPLG: 2018.

Engineering Services Report Drainage and Water Services, Unit 1, M50 Business Park. CSEA 2022a.

Outline Construction Environmental Management Plan, Unit 1, M50 Business Park. CSEA 2022b.

Site Specific Flood Risk Assessment, Unit 1, M50 Business Park. CSEA 2022c.

Ecological Impact Assessment, Unit 1 M50 Business Park, Ballymount, Dublin 12, Change of Use. Moore Group 2022a.

Report for the purposes of Appropriate Assessment Screening, Unit 1 M50 Business Park, Ballymount, Dublin 12. Moore Group 2022b.

Bat Fauna Survey for change of use from warehouse to data repository facility at Unit 1, M50 Business Park, Ballymount Avenue, Dublin 12. Altemar 2022.

Office-of-the-Planning-Regulator (2021) Appropriate Assessment Screening for Development Management OPR Practice Note PN01. March 2021

Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report, European Commission, 2017 http://ec.europa.eu/environment/eia/eia-support.htm

Environmental Impact Assessment Screening, OPR Practice Note PN02 (Office of the Planning Regulator, 2021).

Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes. Transport Infrastructure Ireland (2011).

Resource and Waste Management Plan for a Proposed Data Repository Facility, Unit 1 M50 Business Park, Dublin 12. AWN 2022.

Noise Impact Assessment for a Proposed Data Repository Facility. AWN 2022.

Air and Climate Impact Assessment for a Proposed Data Repository Facility, Unit 1 M50 Business Park, Ballymount, Dublin 12. AWN 2022.