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# Environmental Impact Assessment Screening Report



Proposed Strategic Housing Development  
Lands at Palmerstown Retail Park,  
Kennelsfort Road Lower, Palmerstown, Dublin 20

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## **1.0 Introduction**

### **1.1 Project Background**

Downey Planning have been commissioned by Randelswood Holdings Ltd. to prepare this Environmental Impact Assessment (EIA) Screening Report for a proposed Strategic Housing Development on lands at Palmerstown Retail Park, Kennelsfort Road Lower, Palmerstown, Dublin 20.

This report seeks to identify the requirement for an Environmental Impact Assessment for this project in accordance with the Planning and Development Act, 2000 (as amended). The project under assessment, *Palmerstown Strategic Housing Development*, is fully detailed in Section 2.0 of this report. Please also refer to Appendix A for the detailed site plan drawing prepared by Downey Planning & Architecture.

The project can be briefly described as a residential development comprising 250 no. 'Build to Rent' apartment units consisting of 134 no. 1 beds and 116 no. 2 beds with a café and ancillary residential communal facilities, in 5 no. apartment blocks ranging in height from 3 to 8 storeys over basement car park.

### **1.2 Legislative Context**

The EIA Directive 85/337 EEC, as amended (Directive 2011/92/EU; Directive 2014/52/EU), is the key legislation in EU Environmental Policy. The EIA Directive aims to determine the likely significant effects of a project on the environment. Screening is the first stage in the EIA process required by Article 4 of the EIA Directive and this process determines whether an EIA is required for a specific project. The Directive outlines in Article 4(1) 24 Annex 1 projects that require a mandatory EIA. Article 4 (2) outlines Annex 2 projects that require consideration for EIA further to a case by case examination or through thresholds and criteria set out by Member States. In an Irish context, projects requiring a mandatory EIA or consideration for EIA further to a case by case examination or thresholds are listed in Schedule 5 of the Planning and Development Regulations 2001 (as amended).

In the case of developments which are under the relevant EIA threshold, planning authorities are required under Article 103 of the Regulations to request an EIAR where it considers that the proposed development is likely to have significant environmental effects. In such cases, the significant effects of the project on the environment are assessed relative to criteria outlined in Schedule 7 of the Regulations, namely the project's characteristics, sensitivity of the project location and characteristics of potential impacts.

### **1.3 Methodology**

This report relates to the screening for an EIA of a proposed Strategic Housing Development on lands at Palmerstown Retail Park, Kennelsfort Road Lower, Palmerstown, Dublin 20. In accordance with the EIA Directive and transposed National Legislation, the project will be assessed to determine if a mandatory EIAR is required or if the project is a sub-threshold project, it will also be screened in order to determine if there is likely to be significant effects on the environment from the implementation of the project. This report is written in accordance with guidelines provided in:

- European Union (Planning & Development) (Environmental Impact Assessment) Regulations 2018;
- Planning and Development Act, 2000 (as amended)
- Planning and Development Regulations 2001 (as amended)
- Planning and Development (Housing) and Residential Tenancies Act 2016 (as amended)
- Directive 2011/92/EU
- Directive 2014/52/EU
- Guidance for EIA Screening, European Commission (June 2001)
- Guidelines on the information to be contained in an EIS, EPA (March 2002)
- EIA Guidance for Consent Authorities regarding Sub-Threshold Development, DoEHLG (August 2003)
- Preparation of guidance documents for the implementation of EIA directive (Directive 2011/92/EU as amended by 2014/52/EU) – Annex I to the Final Report (COWI, Milieu; April 2017);
- Guidelines on the Information to be contained in Environmental Impact Assessment Reports, Draft (August 2017)
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, DoEHLG (August 2018)

Using the above documents, it has been possible to carry out an EIA Screening using the best available guidance while operating within the applicable legislation. It is noted that Directive 2014/52/EU has been transposed into Irish Legislation through the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 which came into operation on 1<sup>st</sup> September 2018.

The methodology employed in this screening exercise is in accordance with the EIA Guidelines published in August 2018 by the DoHPLG and the contents of Schedule 7 and 7A of the Planning and Development Regulations 2001 (as amended).

#### **1.4 Site Location and Description**

The subject site, which extends to approximately 1.2708 hectares, is located in Palmerstown which is within the functional area of South Dublin County Council. The subject lands are situated at the junction of Kennelsfort Road Lower and the Chapelizod Bypass (N4), with extensive frontage onto this road.

The lands are accessed via an existing vehicular entrance from Kennelsfort Road Lower. Part of the site is known locally as the former Vincent Byrne site and is referenced as such within the South Dublin County Council Development Plan 2016-2022.

The subject site enjoys excellent connectivity given its proximity to the adjoining Chapelizod Bypass, which provides access directly to the M50 and M4 motorways as well as to Dublin City Centre. The Chapelizod Bypass also comprises a Quality Bus Corridor (QBC) which ensures that the lands are easily accessible by public transport. The subject site is less than 100m from this QBC bus stop.





Fig. 1 – Aerial View (approximate boundaries of application site outlined in red)

## 2.0 Project Description

The project under assessment, *Palmerstown Strategic Housing Development*, will consist of the demolition of all existing structures on site and the construction of a residential development of 250 no. 'build to rent' apartments (134 no. 1 beds, 116 no. 2 beds) in 5 no. blocks; with a café and ancillary residential amenity facilities, to be provided as follows:

- Block A containing a total of 27 no. apartments comprising of 13 no. 1 beds and 14 no. 2 beds, in a building ranging from 3-6 storeys over basement in height, with 1 no. communal roof garden (at third floor level), and most apartments provided with private balconies/terraces. Block A also provides a café, a reception/concierge with manager's office and bookable space at ground floor level; meeting rooms and workspace/lounge at first floor level; a gym at second floor level; and a cinema and a games room at basement level;
- Block B containing a total of 46 no. apartments comprising of 18 no. 1 beds and 28 no. 2 beds, in a building 6 storeys over basement in height, and all apartments provided with private balconies/terraces;
- Block C containing a total of 47 no. apartments comprising of 30 no. 1 beds and 17 no. 2 beds, in a building 6 storeys over basement in height, and all apartments provided with private balconies/terraces;
- Block D containing a total of 67 no. apartments comprising of 33 no. 1 beds and 34 no. 2 beds, in a building 7 storeys over basement in height, and most apartments provided with private balconies/terraces;
- Block E containing a total of 63 no. apartments comprising of 40 no. 1 beds and 23 no. 2 beds, in a building 8 storeys over basement in height, and all apartments provided with private balconies/terraces.

The development also includes the construction of a basement providing 120 no. car parking spaces, 10 no. motorcycle spaces, 250 no. bicycle spaces, and a plant room and bin stores. The proposal also incorporates 5 no. car parking spaces and 26 no. bicycle spaces at surface level; upgrades and modifications to vehicular and pedestrian/cyclist access on Kennelsfort Road Lower; utilisation of existing vehicular and pedestrian/cyclist access via Palmerstown Business Park (onto Old Lucan Road); 1 no. ESB sub-station; landscaping including play equipment and upgrades to public realm; public lighting; boundary treatments; and all associated engineering and site works necessary to facilitate the development.

### 3.0 Statutory Requirement for an EIAR

Development projects requiring an Environmental Impact Assessment Report (EIAR) are set out in Schedule 5 of the Planning and Development Regulations 2001 (as amended). Part 1 of this schedule lists those projects that require a mandatory EIA irrespective of size in any EU Member State whereas Part 2 identifies the threshold limits for projects that require a mandatory EIA in Ireland. Part 2 of Schedule 5 lists the following that may be relevant to the project:

*“10. Infrastructure Projects*

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

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

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

*14. Works of Demolition - Works of demolition carried out in order to facilitate a project listed in Part 1 or Part 2 of this Schedule where such works would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.*

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

Demolition works consisting of the demolition of all existing structures on site will be required in order to facilitate the proposed development. The scheme proposes the construction of 250 no. apartments consisting of 134 no. 1 beds and 116 no. 2 beds, with a café and ancillary residential communal facilities, in 5 no. blocks ranging from 3 to 8 storeys in height, over basement car park, on a site which extends to approximately 1.2708 ha.

Another threshold is the size of the development site and in this regard Article 10(b)(iv) requires that an EIAR be prepared for urban developments 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 subject site in this instance extends to 1.2708 hectares and as such is significantly below the threshold that would normally require an EIAR to be prepared.

In light of the above, the project does not meet the thresholds for which the preparation of an Environmental Impact Assessment Report (EIAR) is a mandatory requirement.

Threshold No. 15, as detailed above, relates to projects likely to have significant effects on the environment having regard to Schedule 7. The following section and basis of this screening is to screen for the requirement of EIAR on a sub-threshold project as the proposal does not exceed any other thresholds in Schedule 5.

#### **4.0 EIA Screening Process**

The criteria under which the project must be considered are outlined within EIA Directive 85/337 EEC (as amended- Directive 2011/92/EU; Directive 2014/52/EU) and the screening criteria categories include:

- (i) Characteristics of the Proposed Development;
- (ii) Location of the Proposed Development; and,
- (iii) Type and Characteristics of Potential Impacts.

This section assesses the proposed project relative to the aforementioned criteria. This will help determine whether or not the proposed project should be subject to an Environmental Impact Assessment. Utilising the documents as detailed above in Section 1.3, it has been possible to carry out a desktop EIA Screening using the best practice guidance whilst working within the applicable legislation. The methodology employed in this screening exercise updates previous guidance in line with the new Directive 2014/52/EU.

##### **4.1 Characteristics of Proposed Development**

The characteristics of the project must be considered, with particular regard to:

###### **(a) the size and design of the whole project**

The application site can be described as an underutilised, urban site with existing buildings, all of which are surrounded by extensive hard standing. All structures on site will be demolished to facilitate the proposed development.

The proposed development consists of the provision of 250 no. 'Build to Rent' apartment units along with associated site development works, boundary treatments and landscaping on a site extending to approximately 1.2708 hectares.

Please refer to Section 2.0 of this report for a detailed description of the proposed development. Please also refer to Appendix A for the detailed site plan drawing prepared by Downey Planning & Architecture. It is considered that the project is of a size and design which will not cause significant effects on the environment.

**(b) cumulation with other existing and/or approved projects**

A detailed search has been carried out of the existing and/or approved projects that may have the potential to result in cumulative impacts. Data sources included South Dublin County Council, An Bord Pleanála and the EIAR Portal.

The proposed development can be considered within the context of the broader consolidation of underutilised, zoned, serviced, brownfield lands that is accommodating the expansion and growth of Dublin, all of which is considered under the South Dublin County Council Development Plan 2016-2022 and indeed the National Planning Framework. The lands to the north of the application site are mature, established areas of Palmerstown village with a mix of uses which have been in existence for a considerable number of years. There are a number of recent planning applications shown on the South Dublin County Council website in the vicinity of the proposed development that are small in scale that would not give rise to a cumulative impact with this proposal. These developments would also be subject to the stringent planning controls of the Planning Authority. Other large-scale plans and projects assessed were located further from the proposed development with no identified pathways for cumulative impacts.

**(c) the use of natural resources, in particular land, soil, water and biodiversity**

This development project is of a scale which will require some natural resources associated with the construction phase. Whilst exact quantities of materials required have not been determined at this stage, large amounts of aggregates will be used during construction phase and will have to be imported to the site. Potable water will also be required for the site. Waste is anticipated to be generated from the demolition, site clearance and basement excavation phases of the development but will be reused on site as much as is practical. The application site can be described as an underutilised brownfield urban site with existing buildings and warehouses, all of which are surrounded by extensive hard standing. Very little natural vegetation exists on the site. The proposed development provides for new, extensive planting across the site as part of the high-quality landscaping proposals for the project and as such it is considered that the proposed development will not cause significant effects on the environment.

**(d) the production of waste**

Quantities of unsuitable material such as soil, hard standing, demolition waste, etc. will be produced as a result of the proposed development. Although every effort will be made to reuse this on site, it may have to be disposed of off-site as it may not all be reused during the construction phase of the proposed development. Whilst the exact amount of this unsuitable material has not been evaluated in detail at this stage of the project, an assessment can be undertaken to identify exact locations for recovery/disposal at construction stage, in accordance with a detailed Construction and Demolition Waste Management Plan for the development. Any waste produced as part of the project will be dealt with in accordance with all relevant waste management legislation and guidance. An Outline Construction and Demolition Waste Management Plan is enclosed as part of the planning application.

**(e) pollution and nuisances**

The subject site is not located within or directly adjoining any designated Natura 2000 sites. During construction, polluting material has the potential to cause environmental effects, however the



likelihood and severity of these effects will be minimised through the employment of construction management best practice. During the construction stage, minor temporary impacts will be experienced by those property owners in the vicinity of the site and those road users on the existing network for the duration of the build. When the proposed development is operational, there will be some increase in noise and traffic levels on the adjoining road network. However, the road network will still operate within its capacity and the development will have a minimal impact. In light of this, it is considered that the project will not have a significant effect on the environment.

**(f) the risk of major accidents and/ or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge**

During the construction stage, the likelihood of an accidental spillage of construction materials into any sensitive environment will be managed through the adoption of strict best practice construction management in accordance with an approved Construction and Demolition Waste Management Plan for the development. Standard health and safety precautions will also be required. During the operational stage, it is anticipated that there will not be any risk of major accidents or disasters affecting the environment.

As this proposal involves upgrades and modifications to the vehicular access onto Kennelsfort Road Lower and to the public, this project is likely to reduce the potential risk of accidents in the future. As part of this, current best practice design standards will be implemented such as DMURS, with the introduction of pedestrian and cyclist accessibility to the surrounding environs of Palmerstown village. Thus, the needs of vulnerable road users are taken into account as part of the proposed development.

**(g) the risks to human health (for example due to water contamination or air pollution)**

During the construction stage, the likelihood of risks to human health due to water contamination, air pollution, noise pollution, visual impacts, etc. will be temporary and not considered to be significant. These risks will be managed through the adoption of strict best practice in accordance with an approved Construction and Demolition Waste Management Plan for the development. In terms of water quality, the scheme is to be connected to public foul and storm water systems, all upgrade works will be carried out in accordance with an approved Construction and Demolition Waste Management Plan. During the operational phase, there is potential for noise and vibration impacts as a result of vehicular movements to and from the development, however, it is not expected that this will give rise to any significant noise nuisance in the area.

## **4.2 The Location of the Proposed Development**

The environmental sensitivity of geographical areas likely to be affected by projects must be considered, with particular regard to:

**(a) the existing and approved land use**

The subject site, which extends to approximately 1.2708 ha, is located in an urban context and is currently an existing retail park with a number of commercial buildings and warehouses on site. These structures will be demolished in order to facilitate the proposed development. The existing land uses consist of units in multiple occupation including car showrooms/car dealerships, furniture stores, barbers, etc.

A large mixed-use scheme, extending to c.30,000sq.m. of development, was previously granted planning permission on the application site. It is noted that this planning permission was granted by South Dublin County Council and An Bord Pleanála (Reg. Ref. SD09A/0021, ABP Ref. PL06S.234178).

The existing surrounding land uses are quite mixed, offering uses which include residential, commercial, retail including a large supermarket (Aldi), industrial, medical, ecclesiastical, educational, leisure, etc. In this regard, the proposed development will integrate successfully with the existing surrounding built environment as the proposed development will create a new, sustainable community which will integrate with Palmerstown village centre and surrounding land uses, and will revitalise the area through the introduction of 250 no. high-quality designed 'Build to Rent' units with associated residential communal facilities, and a café and amenity spaces for the enjoyment of the residents of the proposed development and the Palmerstown community. Palmerstown village has a stagnant, declining population and as such this proposed strategic housing development seeks to provide an injection of population into the area to ensure the viability and vitality of services and facilities within Palmerstown into the future. In light of this, it is considered that the project will not have a significant effect on the environment.

**(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground**

There will be no significant likely effect on the environment in relation to natural resources in the area. The main use of natural resources will be the use of land. However, the site is a brownfield site in an urban context. The scale of natural resources used at both the construction and operation stages is not such that would cause concern in terms of significant likely effects on the environment. In addition, the proposed development will see the improvement of natural resources in the area through the provision of high-quality landscaping, planting, etc. of a sensitive landscape design which will avoid or reduce potential impacts where possible. The proposed landscaping seeks to increase the natural resources of the site which will in turn promote biodiversity. All drainage works will be carried out in accordance with an approved Construction and Demolition Waste Management Plan.

**(c) the absorption capacity of the natural environment, paying particular attention to the following areas:**

**(i) wetlands, riparian areas, river mouths**

There are no wetlands or watercourses located within or adjacent to the subject site that could be affected by the proposed development. The application site is located a considerable distance to the south of the valley of the River Liffey. This is designated as the Liffey Valley Special Amenity Area Order (SAAO). It is recognised that there is a risk to water quality during the construction phase of any development. However, the project will be managed through the adoption of strict best practice construction management in accordance with an approved Construction and Demolition Waste Management Plan. During the operation phase of the project, surface water can carry pollutants to water courses, especially hydrocarbon residues and grit/sediment. The SUDS measures which have been incorporated are likely to ensure that pollution is avoided. This represents an enhancement over the existing situation which includes no attenuation.

**(ii) coastal zones and the marine environment**

There are no coastal zones or marine environments that could be affected by the proposed development.

**(iii) mountain and forest areas**

There are no mountains or forest areas that could be affected by the proposed development.

**(iv) nature reserves and parks**

The proposed development is not located within a nature reserve or park, and is a considerable distance from any nature reserve or park such that this form of natural environment could not be affected by the proposed development.

**(v) areas classified or protected under national legislation; Natura 2000 areas designated by Member States pursuant to Directive 92/43/EEC and Directive 2009/147/EC**

This proposed development is not located within or directly adjacent to any SAC or SPA but pathways do exist to a number of these areas. An assessment of the aspects of this project has shown that significant negative effects are not likely to occur to these areas with regard to their conservation objectives, either alone or in combination with other plans or projects. This has been confirmed in the Screening Report for Appropriate Assessment that was prepared by Faith Wilson Ecological Consultant as part of this project.

**(vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure**

There are no known areas in which the environmental quality standards shall be exceeded.

**(vii) densely populated areas**

The proposed development is located in Palmerstown village with access via Kennelsfort Road Lower. This area is within an urban context with an existing population and is a strategic area to support Dublin's sustainable growth. The current lands are considered brownfield lands with existing buildings and warehouses in place. The development of this site will provide a residential scheme with complementary, ancillary land uses on a valuable land resource. The site is zoned land and serviced for residential development, and the use is compatible with the existing development and uses in the vicinity. The overall character of the surrounding area will not materially change as a result of the proposed development. Therefore, there are no anticipated likely significant effects on the environment in relation to the geographic location of densely populated areas.

**(viii) landscapes and sites of historical, cultural or archaeological significance**

There are no recorded monuments within the application site. An Archaeological Report was prepared for this project by Courtney Deery Heritage Consultancy. Archaeological inspection/monitoring will be carried out during the initial demolition and site clearance works. A detailed Visual Impact Assessment

has been prepared by ARC Architectural Consultants regarding the proposed development which assesses the immediate area as well as the wider built environment.

#### 4.3 Type and Characteristics of Potential Impacts

This section of the report shall consider the criteria under Schedule 7, which relates to the characteristics of the potential impacts and the location of the development being proposed, paying particular regard to the following:

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

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

##### **(a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected)**

The subject site extends to c.1.2708ha of brownfield, zoned, serviced lands which are located in an urban context within the M50 ring of Dublin. The project can be briefly described as the development of 250 no. ‘Build to Rent’ apartments consisting of 134 no. 1 beds and 116 no. 2 beds, with a café and ancillary residential communal facilities, in 5 no. blocks ranging from 3 to 8 storeys in height, over basement car park.

This proposed development is not located within or directly adjacent to any SAC or SPA. No significant adverse impacts have been identified. Any minor impacts envisaged to occur will be localised in nature (noise, dust, potential for surface water pollution) and minimised by way of best practices in the environmental management of construction works, in accordance with an approved Construction Management Plan and Waste Management Plan. It is anticipated that with the adoption of best practice construction management techniques, sensitive detailed design of the proposed development and consultation with key stakeholders, there will be no likely significant effects on the receiving environment or neighbouring areas of environmental significance.

Overall it is considered that impacts are likely to be positive, particularly in respect of impacts on human health and material assets as a consequence of the provision of the high-quality landscaped



areas and amenity facilities. The delivery of 250 no. new residential units within Palmerstown village will provide for a greater number of properties in the area and assist in alleviating the ever-increasing housing demand within Dublin. Once operational, this area will see increased population to Palmerstown village which will assist in sustaining the vitality and viability of existing community and social services and facilities within the area and surrounding environs.

The apartments will be of a diverse mix of unit types, sizes and aspect which will provide a high standard of living and this will be beneficial to the overall wellbeing of future residents. In addition, this project will provide high-quality landscaping and public realm for pedestrians and cyclists and improve connectivity to and accessibility between the proposed development, Palmerstown village and the Old Lucan Road area. In general, impacts are likely to be positive on human health and extend beyond the immediate vicinity of the site and will benefit people from the wider area using the proposed facilities and amenities.

#### **(b) the nature of the impact**

The main adverse impacts include potential for impacts on water quality associated with the construction phase and disturbance to residential amenities within the immediate vicinity of the subject site during the course of construction.

#### **(c) the transboundary nature of the impact**

There are no transboundary impacts associated with the proposed development.

#### **(d) the intensity and complexity of the impact**

The main adverse impacts include potential for impacts on water quality associated with the construction phase. The project will be managed through the adoption of strict best practice construction management in accordance with an approved Construction and Demolition Waste Management Plan

Potential impacts also include disturbance to residential amenities within the immediate vicinity of the subject site during the course of construction. These impacts are not considered to be overly high in magnitude or complex in nature and are standard considerations with respect to such developments.

#### **(e) the probability of the impact**

The application site is located a considerable distance to the south of the valley of the River Liffey. This is designated as the Liffey Valley Special Amenity Area Order SAAO. There is a risk to water quality during the construction phase of any development a sediment or other harmful substances can enter watercourses and damage aquatic life. However, the project will be managed through the adoption of strict best practice construction management in accordance with an approved Construction and Demolition Waste Management Plan. During the operation phase of the project, surface water can carry pollutants to water courses, especially hydrocarbon residues and grit/sediment. The SUDS measures which have been incorporated are likely to ensure that pollution is avoided. This represents an enhancement over the existing situation which includes no attenuation.

Best practice during the construction works phase coupled with the relatively short timescale of works involved are sufficient to ensure that no significant risks are likely to occur in this instance. As part of this, it is noted that no sediments or potentially other harmful pollutants will be permitted to enter watercourses. The control measures implemented will be in accordance with best practice. Therefore, the potential for significant water quality impacts can be discounted in this instance.

This proposed development is not located within or directly adjacent to any SAC or SPA. An assessment of the aspects of this project has shown that significant negative effects are not likely to occur to these areas with regard to their conservation objectives, either alone or in combination with other plans or projects. This has been confirmed in the enclosed Screening Report for Appropriate Assessment that was prepared by Faith Wilson Ecological Consultant as part of this project.

During the operation phase of the project, surface water can carry pollutants to water courses, especially hydrocarbon residues and grit/sediment. The SUDS measures which have been incorporated are likely to ensure that pollution is avoided. This represents an enhancement over the existing situation which includes no attenuation. The control measures implemented will be in accordance with best practice.

During the operational stage of the proposed development, it is likely that visual impact and increased traffic will also be the most probable potential impacts. However, the proposal has been designed to prevent undue impact on third party properties such as overlooking, overshadowing and loss of daylight/sunlight and in this regard any potential impact is expected to be slight. Furthermore, the increase in traffic associated with the proposed development is also likely to be slight with the potential increase in traffic volumes being within the carrying capacity of the adjoining road network.

Those living and working in the area will be temporarily disrupted during the construction works phase. Thus, potential exists for temporary impacts on residential amenity from noise, traffic, dust and possibly on water quality associated with the construction works required. This disturbance to residential amenities within the immediate vicinity of the subject site will however be temporary in nature. The implementation of best practice during the construction works phase and the timescale of works involved are sufficient to ensure that no significant impacts are likely to occur in this instance. Once operational, this area will see increased population to Palmerstown village which will assist in sustaining the vitality and viability of existing community and social services and facilities within the area.

#### **(f) the expected onset, duration, frequency and reversibility of the impact**

The construction impacts are going to be temporary in nature. The anticipated impacts at operational stage which would predominantly be of a visual nature are anticipated to be permanent and irreversible but overall not deemed a significant impact when considered in the context of the overall wider area. A detailed Visual Impact Assessment has been prepared regarding the proposed development which assesses the immediate area but also the wider built environment with particular focus on key areas within Palmerstown including the Liffey Valley, buildings of protected status, and/or buildings of historical and cultural significance.

**(g) the cumulation of the impact with the impact of other existing and/or approved projects**

This development can be considered within the context of the broader consolidation of underutilised, zoned, serviced, brownfield lands that is accommodating the expansion and growth of Dublin, all of which is considered under the South Dublin County Council Development Plan 2016-2022 and indeed the National Planning Framework. The lands to the north of the application site are mature, established residential areas of Palmerstown which have been in existence for a considerable number of years. There are a number of recent planning applications shown on the South Dublin County Council website in the vicinity of the proposed development that are small in scale that would not give rise to a cumulative impact with this proposal. These developments would also be subject to the stringent planning controls of the planning authority. Other large-scale plans and projects assessed were located further from the proposed development with no identified pathways for cumulative impacts. However, potential does exist for cumulative temporary impacts on residential amenity from noise, traffic, dust and on water quality associated with the construction works required for the proposed development and any ongoing construction works in the wider area. However, the proposed works will be carried out in accordance with strict best practice construction management as required by an approved Construction Management Plan for the development.

**(h) the possibility of effectively reducing the impact**

During the construction stage, all works will be carried out in accordance with strict best practice construction management as required by an approved Construction Management Plan for the development to effectively reduce the potential impacts. Standard health and safety precautions will also be implemented at all times during the construction phase.

**4.4 Section 171A of Planning and Development Act 2000, as amended**

The effects of the proposed development on the following factors needs to be evaluated in an “environmental impact assessment” as defined under Section 171A of the 2000 Act:

- i. *“population and human health;*
- ii. *biodiversity, with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive;*
- iii. *land, soil, water, air and climate;*
- iv. *material assets, cultural heritage and the landscape;*
- v. *the interaction between the factors mentioned in clauses (I) to (IV)” (Section 171A of the Planning and Development Act 2000, as amended)*

These topics shall now be considered and assessed:

**(i) Population and Human Health*****Population***

The Core Strategy of the South Dublin County Council Development Plan 2016-2022 seeks to accommodate an additional 43,262 people during the lifetime of the Development Plan and would require approximately 40,650 housing units to provide for the population growth.

According to the total housing capacity under the 2016-2022 County Development Plan, approximately 9,620 units can be accommodated within the 'Consolidation Areas within the Gateway' (includes Palmerstown), within which the subject site is located.

The proposed development is considered to be consistent with the policies of the National Planning Framework, which seeks to deliver more compact urban development with Objective 3A of the NPF stating that half of new homes to be constructed in Ireland's cities are to be located within the city's existing urban envelope.

### *Human Health*

Having regard to the nature and use of the proposed development, any potential effects on human health are likely to arise from during the construction phase of the proposed development, as opposed to the operational phase. Such issues would include the likes of water contamination, air pollution, noise pollution, visual impacts, etc, which will be temporary and not considered to be significant. These issues will be managed through the adoption of strict best practice in accordance with an approved Construction and Demolition Waste Management Plan for the development.

In terms of water quality, the scheme is to be connected to public foul and storm water systems and as such, no significant effects on the environment are likely. During the operational phase, there is potential for noise and vibration impacts as a result of vehicular movements to and from the development, however, it is not expected that this will give rise to any significant noise nuisance in the area.

At operational stage, it is not expected that there would be any risks of effects on human health. This project will provide high-quality landscaping and public realm for pedestrians and cyclists and improve connectivity to and accessibility between the proposed development, Palmerstown village and the wider area. In general, impacts are likely to be positive on human beings and extend beyond the immediate vicinity of the site and will benefit people from the wider area using the proposed facilities and amenities. The site is not located within an environmentally sensitive location and as such there is no risk to human health in terms of any Seveso site.

### *(ii) Biodiversity*

Faith Wilson Ecological Consultant has prepared a Screening Report for Appropriate assessment, including a bat and badger survey, which is included under separate cover. In summary, the subject lands are fully developed and enclosed within an urban context, thus there are no significant changes expected to any Natura 2000 site relating to habitat or species reduction, and/or changes to key indicators of conservation value. The enclosed Screening Report for Appropriate Assessment confirms that there will be no adverse impact on any designated Natura 2000 sites as a result of the proposed development, either alone or in combination with other plans and projects.

### *(iii) Land, Soil, Water, Air and Climate*

The development is located on a brownfield site that accommodates a number of existing buildings and warehouses, all of which are surrounded by extensive hard standing. It is fully serviced and is not located at or adjoining a designated environmental site or on lands at risk from flooding.



No significant effects are anticipated on land, soil, water, air or climate during the construction phase or operational phase of the proposed development.

(iv) Material Assets, Cultural Heritage and Landscape

*Material Assets*

The site is zoned for residential development under the South Dublin County Council Development Plan 2016-2022. The development has been subject to a traffic assessment that confirms that there is capacity within the road network to accommodate the development.

An appropriate separation distance is being provided between the proposed buildings and any existing services and sewers that may traverse the site and a letter of design acceptance has been provided by Irish Water in terms of the capacity of the network.

A daylight/sunlight assessment carried out by Digital Dimensions confirmed that the development will not give rise to any adverse effect on third parties and that the development will receive adequate light to serve the future population being proposed.

*Cultural Heritage*

There are no protected structures or buildings listed on the NIAH within or immediately adjoining the site. An Archaeological Desk Study was carried out by Courtney Deery Archaeology & Cultural Heritage, submitted as part of this SHD application, which indicates that the previous development of the subject site significantly reduces the potential to reveal intact archaeological remains within the proposed development footprint. However, as an appropriate mitigation strategy it is recommended that an archaeological inspection of topsoil stripping be carried out during groundworks/top soil removal phase of the proposed development.

*Landscape*

The site can be described as an underutilised, brownfield, urban site with a number of existing buildings and warehouses, all of which are surrounded by extensive hard standing. It is not located within a sensitive landscape and is not affected by any protected or preserved views or habitats. There will be a change to the scale of development proposed and as such will change the view of the site. However, in light of the fact that it is in the Metropolitan area of Dublin City and the nature and scale of existing and granted development in the surrounding area, it is considered that this is not an adverse impact.

(v) Interaction between the factors

From the interaction between the factors considered in this EIA Screening Report, it is respectfully considered that there are no likely significant effects anticipated as a result of this development, either individually or in combination with other plans and projects.

## 5.0 Recommendation and Conclusion

The report has assessed the potential impact of the proposed development on the environment. The proposed development will provide a total of 250 no. 'Build to Rent' apartment units with a café and ancillary residential facilities along with landscaping and all associated site works on a site of 1.2708 hectares on lands at Palmerstown Retail Park, Kennelsfort Road Lower, Palmerstown, Dublin 20.

The proposed development does not exceed any of the thresholds outlined in the Planning and Development Regulations 2001 (as amended) that would trigger a mandatory requirement to prepare an EIAR. The proposed development is sub-threshold and therefore is assessed in accordance with Article 27 of the European Communities EIA Regulations 2018.

The screening exercise has been completed in this report and the methodology used has been informed by the available guidance, legislation and directives including *Environmental Impact Assessment (EIA) (2018)*, *Guidance for Consent Authorities regarding Sub-Threshold Development (EPA, 2003)* and *Guidance on the information to be contained in environmental impact assessment reports (Draft, 2017)*.

Having regard to Annex III of the EIA Directive 2014/52/EU and the guidance contained in the Department's Environmental Impact Assessment Guidance for Consent Authorities regarding Sub-Threshold Development (2003), and in particular:

- The size and design of the whole project;
- Cumulation with other existing and/or approved projects;
- The use of natural resources, in particular land, soil, water and biodiversity;
- The production of waste;
- Pollution and nuisances;
- The risk of major accidents and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge; and
- The risks to human health (for example due to water contamination or air pollution).

It is considered that the environmental effects arising from the project will generally be localised, minor in nature and occur principally during the construction phase. The majority of the impacts will be temporary and reversible in nature. The probable impacts associated with the operational stage are likely to be visual impact and increased traffic. However, the proposal has been designed to prevent undue impact on third party properties such as overlooking, overshadowing and loss of daylight/sunlight and in this regard any potential impact is expected to be slight. Furthermore, the increase in traffic associated with the proposed development is also likely to be slight with the potential increase in traffic volumes being within the carrying capacity of the adjoining road network, which are anticipated to be slight in nature. The Screening Report for Appropriate Assessment that was prepared by Faith Wilson Ecological Consultant confirmed that the proposed development will not give rise to any significant effect on designated and protected sites.

Thus, having regard to the above, and in particular to the nature, scale and location of the proposed project, by itself and in combination with other plans and projects, the proposed development is not likely to have significant effects on the environment and it is considered that an Environmental Impact Assessment is not required for this project.

## Appendix A – Proposed Works

