

EIA SCREENING REPORT

In respect of

Proposed Build-to-Rent Apartment and Commercial Development

At

Newtown, Malahide Road, Dublin 17

Prepared by

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On behalf of

Claregrove Developments Limited

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1.0 INTRODUCTION

- 1.1 On behalf of the applicant, Claregrove Developments Limited, we hereby submit this Environmental Impact Assessment Screening Report to assess the potential impacts on the environment of the proposed build to rent apartment and commercial development on lands at Newtown, Malahide Road, Dublin 17. The application site contains a petrol filling station and vacant commercial buildings, including a former motor showroom (Crossan Motors) with offices, a tyre centre and a commercial workshop and office. The site is bound by a local residential access road and Clare Village residential apartments to the east and south east, Grove Lane to the south west, a tyre centre (First Stop) to the north and Malahide Road (R107) to the west.
- 1.2 The application site extends to approximately c. 1.22 ha, including a section of the adjacent public roads, and adjoins the R107 for a distance of c. 200 metres. It is currently occupied by existing areas of hardstanding / surface car parking, a petrol / filling station and a car repair centre / garage. The subject site therefore constitutes a brownfield, infill site.
- 1.3 The proposed development consists of *inter alia* the construction of a development comprising two blocks of 8 – 10 storeys, to accommodate 331 Build to Rent apartment units, communal facilities and amenities, a childcare facility, and commercial units. The development also includes the provision of communal, public and private open space, public realm improvements, car, cycle and motorcycle parking.
- 1.4 This report accompanies a Strategic Housing Development application to ABP. The possibility of impacts from the proposed development on the environment has been examined through the process of an EIA Screening which will be detailed below.
- 1.5 This document is submitted in response to Section 11 of the Application Form which requests that a statement be submitted identifying the potential impacts of the proposed development on the environment.

2.0 SITE DESCRIPTION & CONTEXT

- 2.1 The application site (c. 1.22 hectares) is located on the eastern side of the Malahide Road (R107). The subject site adjoins the R107 for a distance of c. 200 metres and is currently occupied by existing areas of hardstanding / surface car parking, a petrol / filling station and a car repair centre / garage.
- 2.2 The subject site is relatively flat and is currently completely under hard surfaces or existing buildings (i.e. it constitutes a brownfield site). None of the buildings on the subject site are of any architectural merit and the southern portion of the site (covered by surface car parking) is in poor physical condition.
- 2.3 The site is bound to the west / northwest by the R107 Malahide Road, to the south by Grove Lane (beyond which is Grove Park, an existing residential area), to the east / southeast by a private roadway and existing area of residential development (Clare Village) and to the north by a tyre centre (First Stop) beyond which is the Clarehall Shopping Centre.

- 2.4 Clarehall Shopping centre includes a wide range of retail and retail service uses, including a large Tesco supermarket, post office, grocery stores, fashion retail, technology stores, bookshops, cafes and restaurants.

3.0 DESCRIPTION OF THE PROPOSED DEVELOPMENT

- 3.1 The proposed development submitted to the Board for comprises a Strategic Housing Development of 331 no. residential units across a range of unit sizes and types, along with residential amenities, three commercial units, a childcare facility, parking, and all associated development. The brief description of the proposal as set out within the public notices is as follows:

- *“Demolition of all existing structures on the site;*
- *Provision of 331 no. Build to Rent residential units (82 no. 1 bed units, 13 no. 2 bed-3 person units, 226 no. 2 bed-4 person units, 8 no. 2 bed duplex units and 2 no. 3 bed duplex units), in two no. blocks (Block A, containing 93 units, to the south west and Block B, containing 238 units, to the north east), ranging in height from 8 to 10 no. storeys (including ground and mezzanine floor levels);*
- *Block A contains a double height ground floor level containing two no. commercial units (for Class 1- Shop / Class 2- Office / Restaurant / Café use), a reception area, and an internal / undercroft ground floor car park accessed off Grove Lane incorporating bicycle parking and refuse storage areas. 2 no. duplex units over two levels are located to the rear of Block A;*
- *Block B contains a double height ground floor level containing ancillary communal support facilities and amenities, which includes a reception area, a shared work space, a gym and a laundry, a commercial unit (for Class 1- Shop / Class 2- Office / Restaurant / Café use), and a childcare facility, with associated outdoor play area. 8 no. duplex units are located to the rear of Block B over two levels. Block B includes an internal / undercroft car park area over four levels (including partial basement) to be accessed from the Malahide Road and incorporating car, motorcycle, bicycle parking and refuse storage areas;*
- *Block B contains an internal communal amenity space at seventh floor level, lettable storage space from first to eighth floor level and office space from first to sixth floor level and eighth floor level;*
- *The proposal contains a total of 201 no. car parking spaces, 640 no. cycle spaces and 11 no. motorcycle spaces;*
- *Public realm improvements are proposed along the Malahide Road and Grove Lane frontage and a central area of public open space is proposed between Block A and B. Outdoor communal open space areas are proposed at podium level and roof level;*
- *The proposed development will provide balconies / terraces on all elevations, boundary treatments and landscaping, two no. ESB sub-stations, drainage and service works, the closing off of existing vehicular entrances, the creation of a vehicular access and egress point from the Malahide Road (R107) and from Grove Lane, an enhanced pedestrian / cycle crossing on the Malahide Road and other associated works, and all ancillary site development works necessary to facilitate the development.”*

- 3.2 The proposed development will constitute the redevelopment of an underutilised area of brownfield land to provide a residential and commercial development that is compatible with and complements surrounding uses.

This will maximise the land resource and deliver compact growth at a suitable urban location identified as a KDC and an SDRA and adjacent to existing and planned public transport provision.

- 3.3 For further detail on the design approach please refer to the architectural drawings, design statement and the landscape drawings and report which accompany the application.
- 3.4 This EIA Screening Report and the proposed development is supported and informed by the accompanying application documents including an Appropriate Assessment Screening Report prepared by Openfield Environmental Consultants, a Desktop Archaeology Report prepared by IAC, a Townscape and Visual Impact Assessment prepared by Park Hood, an Engineering Services Report, a Demolition Method Statement, an Outline Construction Management Plan, a Demolition, Construction and Operational Waste Management Plan prepared by JOR Consulting Engineers, and a Sunlight and Daylight Assessment prepared by 3D Design Bureau, which address a variety of environmental issues in assessing the proposed development.

4.0 EIA SCREENING METHODOLOGY

Legislation & Guidance

- 4.1 This EIA Screening exercise has been guided by the following documents:
- 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;
 - European Commission Environmental Impact Assessment of Projects Guidance on Screening (2017);
 - Transposition of 2014 EIA Directive (2014/52/EU) in the Land Use Planning and EPA Licensing Systems – Key Issues Consultation Paper (2017; DoHPCLG);
 - Preparation of guidance documents for the implementation of EIA directive (Directive 2011/92/EU as amended by 2014/52/EU) – Annex I to the Final Report (COWI, Milieu; April 2017);
 - Guidelines on the information to be contained in environmental impact assessment reports, EPA, 2017 (Draft)
 - Environmental Impact Assessment – Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018; DoHPLG).
 - Guidance for Consent Authorities regarding Sub-threshold Development (2003; DoEHLG)
- 4.2 With reference to the above documents it has been possible to carry out a desktop EIA Screening using the best available guidance while operating within the applicable legislation. It is noted that Directive 2014/52/EU has been transposed into Irish Legislation through the Planning & Development Act 2000, as amended, and the Planning & Development Regulations 2018.

- 4.3 The requirements for Screening are contained in Article 4 of the EIA Directive, Annex IIA, and Annex III to the Directive.
- 4.4 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 2001-2018.
- 4.5 The European Commission Guidelines on EIA Screening (2018) state the following:

“The purpose of Screening is to determine whether or not an EIA is required for a particular Project listed in Annex II of the EIA Directive. Projects listed in Annex II will hereafter be referred to as ‘Annex II Projects’.

Screening has to implement the Directive’s overall aim, i.e. to determine if a Project listed in Annex II is likely to have significant effects on the environment and, therefore, be made subject to a requirement for Development Consent and an assessment, with regards to its effects on the environment. At the same time, Screening should ensure that an EIA is carried out only for those Projects for which it is thought that a significant impact on the environment is possible, thereby ensuring a more efficient use of both public and private resources. Hence, Screening has to strike the right balance between the above two objectives.”

EIA Thresholds

- 4.6 Schedule 5 of the Planning and Development Regulations 2001-2018 sets out the thresholds for which if a project exceeds, must be subject to an Environmental Impact Assessment.
- 4.7 Part 2 of Schedule 5 lists the following that are relevant to the proposal:

‘10. Infrastructure projects –

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

(iii) Construction of a shopping centre with a gross floor space exceeding 10,000 square metres;

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

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

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

- 4.8 The proposal relates to the construction of 331 no. build to rent residential apartments in two blocks and is therefore below the 500 residential unit mandatory EIA threshold set out in Schedule 5 of the Planning and

Development Regulations 2001 (as amended). The application site area is circa 1.054 hectares and therefore the proposals are significantly below the 10 ha threshold for urban development in a built up area as set out above. Therefore, a mandatory EIA is not required.

- 4.9 No. 15 of Schedule 5 relates to projects likely to have significant effects on the environment having regard to Schedule 7 of the Planning and Development Regulations 2001-2018. In this respect, we note the various reports submitted with the application do not identify any significant environmental impacts.
- 4.10 The AA Screening Report prepared by Openfield Ecology states:
- “It can be concluded on the basis of objective information that the proposed development is not likely to have any significant effect on any European site, either alone or in combination with other plans and projects.”*
- 4.11 The redevelopment of the site is proposed including the demolition of existing buildings on site. An Outline Construction Waste Management Plan prepared by JOR Consulting Engineers accompanies this submission and makes provision for the safe and efficient disposal of all material from the site.
- 4.12 As set out above it is submitted that the proposal does not fall within any of the EIAR thresholds arising under Class 10 as set out above. The following sections provide information to allow for the screening of this proposal as a subthreshold project, as the proposal does not exceed any of the thresholds listed in Schedule 5.

Sub Threshold Projects Requiring EIA

- 4.13 Development which is below the threshold of requiring an EIAR as set out in Schedule 5 of the Planning and Development Regulations 2018 may still require an EIA.
- 4.13 Sub-threshold development means ‘*development of a type set out in Part 2 of Schedule 5 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*’.
- 4.14 Schedule 7A of the Planning and Development Regulations 2001 (as amended) outlines the information to be provided by the applicant or developer for the purposes of screening sub-threshold development for environmental impact assessment, as set out below:

‘1. A description of the proposed development, including in particular—

(a) a description of the physical characteristics of the whole proposed development and, where relevant, of demolition works, and

(b) a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.

2. A description of the aspects of the environment likely to be significantly affected by the proposed development.

3. A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from—

(a) the expected residues and emissions and the production of waste, where relevant, and

(b) the use of natural resources, in particular soil, land, water and biodiversity.

4. The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7’.

4.15 Schedule 7A (4) refers to the criteria set out in Schedule 7 which should be used in determining whether sub threshold development listed in part 2 of schedule 5 should be subject to an environmental impact assessment.

4.16 The criteria under Schedule 7 are grouped under three broad headings:

- Characteristics of proposed development;
- Location of proposed development; and
- Types and characteristics of potential impacts.

4.17 The following sections provide the information required by Schedule 7A for the purposes of screening sub-threshold development for environmental impact assessment, and takes into account, where relevant, the criteria outlined in Schedule 7.

5.0 EIA SCREENING STATEMENT

Introduction

5.1 The following sections provide the information as required by Schedule 7A for the purposes of screening sub-threshold development for environmental impact assessment.

1. A description of the proposed development, including in particular—

(a) a description of the physical characteristics of the whole proposed development and, where relevant, of demolition works, and

(b) a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.

Physical Characteristics of the Proposed Development

5.2 The proposed development will consist of the demolition of existing buildings on site and the provision of 331 no. Build to Rent residential units (82 no. 1 bed units, 13 no. 2 bed-3 person units, 226 no. 2 bed-4 person units, 8 no. 2 bed duplex units and 2 no. 3 bed duplex units), in two no. blocks (Block A, containing 93 units, to the south west and Block B, containing 238 units, to the north east), ranging in height from 8 to 10 no. storeys (including ground and mezzanine floor levels).

- 5.3 Block A contains a double height ground floor level containing two no. commercial units (for Class 1- Shop, Class 2- Office or Restaurant / Café use), a reception / lobby area, and an internal / undercroft ground floor car park accessed off Grove Lane incorporating bicycle and waste storage areas.
- 5.4 Block B contains a double height ground floor level containing a reception area, communal amenity space containing a shared work space and a gym, a commercial unit (for Class 1- Shop, Class 2- Office or Restaurant / Café use), a laundry area, and a childcare facility, with associated outdoor play area, in addition to the above referenced duplex units. An internal / undercroft car park area is proposed over four levels (including partial basement) to be accessed from the Malahide Road and incorporating bicycle and waste storage areas.
- 5.5 The ancillary resident support facilities, services and amenities consist of reception areas, parcel delivery / storage areas, a gym, shared work space, office space, lettable storage rooms, and a communal amenity area at seventh floor level.
- 5.6 The scheme contains a total of 201 no. car parking spaces, 640 no. cycle spaces and 11 no. motorcycle spaces.
- 5.7 Public realm improvements are proposed along the Malahide Road and Grove Lane frontage and a central area of public open space is proposed. Outdoor communal open space areas are located at podium level and at roof level.
- 5.8 The proposed development will provide balconies and / or terraces on all elevations, boundary treatments and landscaping, two no. ESB sub-stations, drainage and service works, the closing off of existing vehicular entrances, the creation of a vehicular access and egress point from the Malahide Road (R107) and from Grove Lane, and all ancillary site development works necessary to facilitate the development.
- 5.9 For further detail on the physical characteristics of the proposed development please refer to the architectural drawings, Design Statement, Engineering Services Report, Landscape Report, and the landscape drawings which accompany the application.
- 5.10 The development is considered to provide for an appropriate density and quantum of apartments to ensure the potential of this brownfield land resource is fully utilised. In doing so, the proposal will contribute to achieving compact growth in a KDC and SDRA which is accessible to public transport.
- 5.11 This project is considered to be compatible with its immediate adjoining land uses, which are predominantly residential to the south and east and commercial to the north. This highlights the suitability of the site for the proposed scheme, which is compatible with its surrounding land uses and compliant with the site's Z14 zoning objective under the Dublin City Development Plan 2016-2022.
- 5.12 The development will maintain access from the Malahide Road to the First Stop Tyres premises adjacent via an existing right of way.

Location of the Proposed Development

- 5.13 The application site (c. 1.22 hectares) is located on the eastern side of the Malahide Road (R107). The subject site adjoins the R107 for a distance of c. 200 metres and is currently occupied by existing areas of hardstanding / surface car parking, a petrol / filling station and a car repair centre / garage.
- 5.14 The subject site is relatively flat and is currently completely under hard surfaces or existing buildings (i.e. it constitutes a brownfield site). None of the buildings on the subject site are of any architectural merit and the southern portion of the site (covered by surface car parking) is in poor physical condition.
- 5.15 The site is bound to the west / northwest by the R107 Malahide Road, to the south by Grove Lane (beyond which is Grove Park, an existing residential area), to the east / southeast by a private roadway and existing area of residential development (Clare Village) and to the north by a tyre centre (First Stop) beyond which is the Clarehall Shopping Centre.
- 5.16 Clarehall Shopping centre includes a wide range of retail and retail service uses, including a large Tesco supermarket, post office, grocery stores, fashion retail, technology stores, bookshops, cafes and restaurants.

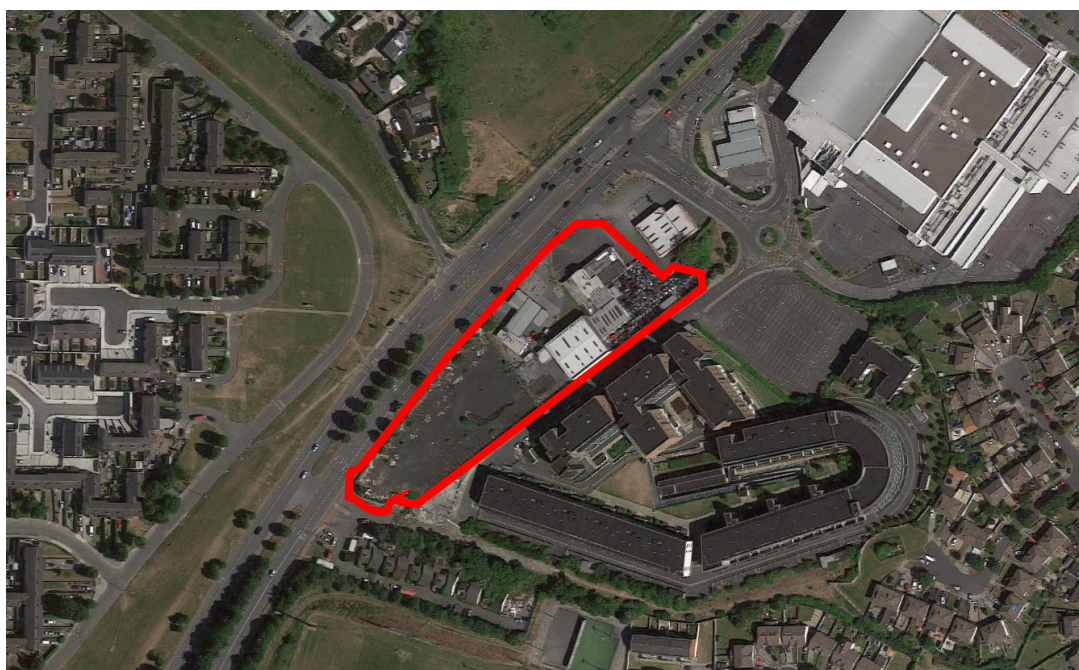


Figure 1: Aerial view of the subject site (approximate site boundary in red)

- 5.17 The immediate surrounding context comprises a range of existing uses, with varying scale and design of existing development. A site to the north east of the subject site (currently occupied by a surface car park) has recently been the subject of a grant of permission for a strategic housing development, decision dated the 19/07/2019, under Reg. Ref.: ABP-304196-19 comprising of 123 build to rent residential units within a single building ranging in height from four to nine storeys.

- 5.18 The R107, where it is fronted onto by the site, provides for pedestrian facilities and an on street cycle route. At this point the R107 provides two lanes of vehicular traffic in each direction, in addition to a bus lane in each direction.
- 5.19 There is an existing pedestrian crossing point adjacent to the subject site, with bus stops on either side of the roadway at this location. These stops are served by the 15, 27, 42 and 43 bus routes, providing a high frequency of services linking with a range of locations and termini, including Dublin City Centre.
- 5.20 The R107 forms part of the BusConnects core bus corridor upgrade programme – route 1, Clongriffin to City Centre corridor. This will see the delivery of significant upgrades along this route, benefiting the subject site, including the introduction of full bus priority lanes and upgraded segregated cycling facilities, thereby enhancing the accessibility of the subject site.

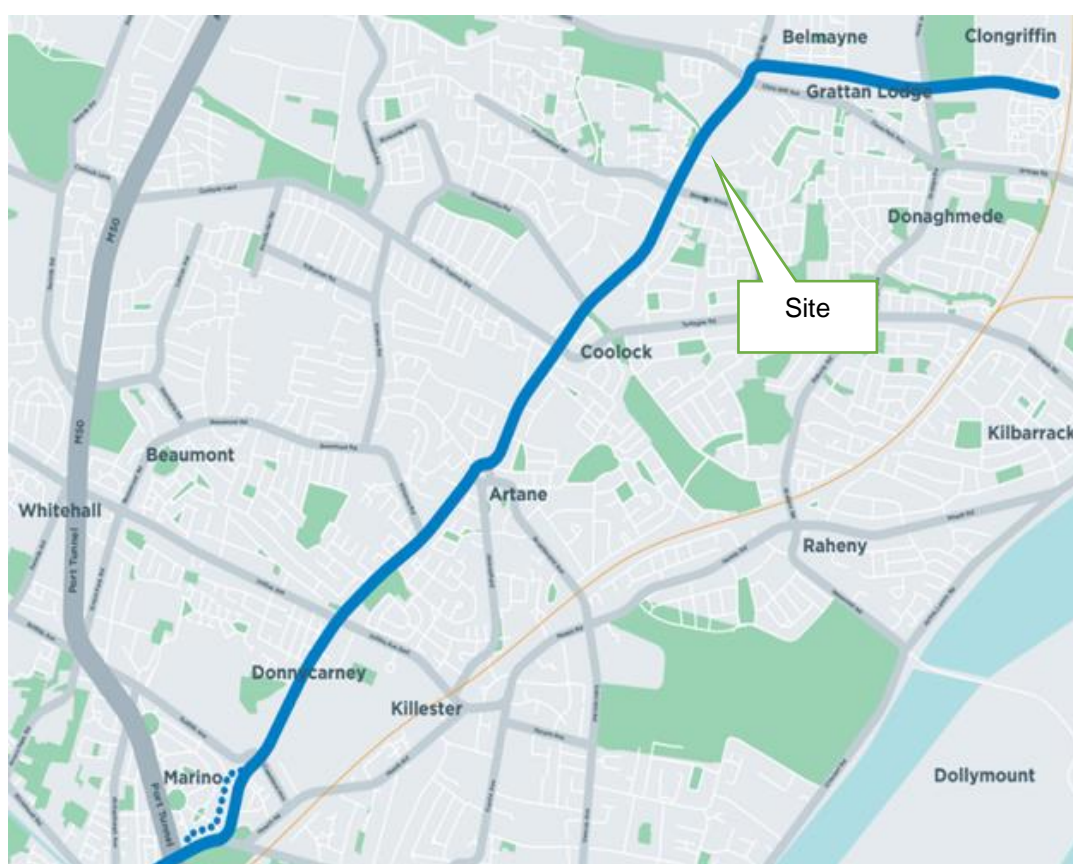


Figure 2: Extract from Bus Connects Map

2. A description of the aspects of the environment likely to be significantly affected by the proposed development.

- 5.21 This section is intended to provide a statement on the possible effects on the environment, if any. This section will consider the potential impacts of the proposed development under the environmental topics prescribed by Directive 2014/52/EU. This approach will assist in providing a comprehensive description of the aspects of the environment likely to be significantly affected by the proposed development that have not previously been identified.
- 5.22 The subject lands are brownfield in an urban context and currently exist as surface car parking and existing buildings. The development of the lands will

serve to maximise the land resource. The immediate surroundings are occupied by existing development, with residential development to the south and east and commercial and retail uses to the north. A significant area of open space and undeveloped zoned land is located to the west of Malahide Road, with a GAA Sports ground approximately 200m to the south.

- 5.23 Owing to the site's brownfield nature, the lack of pathways to existing streams or watercourses, it is considered unlikely to have any impacts on Natura 2000 sites, none of which are located within 2km of the subject site. This is detailed further by the Appropriate Assessment Screening Report accompanying this submission prepared by Openfield.
- 5.24 The proposal will incorporate the redevelopment of the site and the disposal of the waste material arising from the excavation of the site in order to accommodate a level of basement car parking and demolition of existing structures. All waste material during the construction period will be disposed of via the correct methods, as noted within the accompanying waste management plan prepared by JOR Consulting.
- 5.25 The proposal includes the demolition of existing buildings on the subject site, this is not expected to result in any significant impact on the environment. The Outline CMP, Demolition Method Statement, and the Construction, Demolition, and Operational Waste Management Plan prepared by JOR Consulting Engineers should be referred to for further detail pertaining to the proposed demolition and construction works.

Population & Human Health

- 5.26 There may be possible short term nuisances to human beings from noise and pollution during demolition and construction. These are not likely to be at such a quantity or of such a significance that would warrant the completion of a sub threshold EIAR. Noise and dust or pollution will be subject to standard mitigation measures as per typical construction projects.
- 5.27 The proposed build to rent apartment scheme is located at an accessible site which is neighbored by existing residential and commercial development. The proposal will make optimal use of the area of underutilised brownfield land and deliver compact growth and densification at an appropriate location. The proposed use will complement its surroundings and constitutes sustainable development of the site.
- 5.28 The noise impact assessment report, prepared by TMS Environment, outlines mitigation measures that will be incorporated into the walls and glazing of the building to ensure suitable internal noise levels for future residents. The microclimate assessment report does not indicate any potential for adverse wind impacts in the area arising from the proposed development.
- 5.29 There are no operational impacts that would be likely to cause significant effects on the environment in terms of population and human health.

Biodiversity

- 5.30 The subject site is a brownfield site with existing commercial uses and does not contain any evidence of biodiversity on the site. As previously set out, the subject site is not included in any Natura 2000 site and does not support any

of the habitats or species of interest listed. Therefore, it cannot have a 'reservoir' function in re-populating them. The Baldoyle Bay SAC/SPA is the closest Natura 2000 site, located approximately 3.2km east. The North Dublin Bay SAC and North Bull Island SPA also fall within this zone of influence.

- 5.31 The development will not result in the loss or disturbance of habitats or semi-natural habitats connected to Natura 2000 areas as noted by the accompanying AA Screening Report. Indirect disturbance via amenity pressures on coastal areas is unlikely to arise from this project due to the nature of the works and their distance to Natura areas.

Lands and Soils

- 5.32 The subject lands are brownfield land which currently exist as existing buildings and surface car parking / hard standing. Previous development of the site did not result in the discovery of any hazardous materials or contaminated soils. A full site investigation will be undertaken in advance of demolition and construction commencing, to assess the quality of the lands at the site. A high level of due diligence carried out at the site will ensure a reduced environmental impact, as referenced in the Demolition Method Statement and Outline Construction Management Plan. There is not likely to be significant effects on the environment with regard to soils and/or geology due to the site being connected to public foul, storm and water services.

Water

- 5.33 The proposed development is located at a significant distance from any significant waterways that may cause concern. It is considered that in relation to water, there are no anticipated significant effects on the environment arising from the proposed development.

Air & Climate

- 5.34 There may be a minor degradation of the air quality in a very localised area during certain parts of the construction process. Standard mitigation measures would be appropriate as set out in the accompanying Demolition Method Statement and Outline Construction Management Plan. It is considered that there will be no negative impact on the climate that would be likely to have a significant effect on the environment.
- 5.35 The Contractor shall continuously monitor dust over the variation of weather and material disposal to ensure the limits are not breached throughout the project. The Demolition Method Statement and Construction Management Plan submitted herewith contain mitigation measures to ensure that there is no risk of a significant impact in terms of air quality or climate during construction.
- 5.36 Based on the nature and scale of the proposed development, it is not considered likely that any significant impact could arise during operation.

Noise & Vibration

- 5.37 There may be noise and vibration during the demolition and construction phase. It is considered that there will be no significant noise or vibration

effects on the environment during the construction phase subject to standard demolition and construction mitigation measures. As set out within the Demolition Method Statement and Outline Construction Management Plan submitted with the application, construction activities will be carried out in compliance with the recommendations of BS 5228, Noise Control on Construction and open sites part 1 and comply with BS m6187 Code of Practice for Demolition. Noise monitoring will be undertaken on site to ensure that there is no risk of a significant environmental impact in this regard.

- 5.38 Construction equipment for use outdoors shall comply with the European Communities Regulations– Noise Emission by Equipment for Use Outdoors – SI 241 2006.
- 5.39 The Noise Impact Assessment Report, prepared by TMS Environment, outlines mitigation measures that will be incorporated into the walls and glazing of the building to ensure suitable internal noise levels for future residents, given existing background noise levels in the area. This will ensure no adverse noise impacts during the operational phase.

Landscape

- 5.40 There are no landscape designations on the subject site. The site will not impact on any designated views or prospects within the Dublin City Development Plan 2016-2022. It is not considered that there will be significant effects on the environment effects on the environment in relation to landscape.
- 5.41 The visual impact of the proposed development on the local area is considered to be substantial due to the existing site context and the scale of the proposed development as set out within the accompanying Park Hood Townscape and Visual Impact Assessment, but this is not considered to constitute a significant impact on the environment which would require that EIA be undertaken. These local impacts can be successfully absorbed without causing any unacceptable or adverse townscape / landscape effects.
- 5.42 The Park Hood report concludes as follows:

“The Application Site comprises a utilitarian site that contributes little to the character and visual quality of this part of Dublin city. The proposed development, while substantial, would result in a positive contribution to the townscape character and urban fabric serving as an excellent example of a city moving forward. While recognising there are some significant local impacts this report concludes that this proposal, on balance, has no unacceptable townscape / landscape or visual effects and can be successfully absorbed into the character and views of this part of the city.”

Material Assets

- 5.43 The land on which the site is situated is a material asset. It has been zoned for redevelopment through the appropriate process, and as such, the use of this material asset in a manner compatible with the zoning designation, is entirely appropriate. Once constructed, the operational phase will provide an important material asset for the residents in in terms of providing amenity and recreation.

Archaeology, Architecture and Cultural Heritage

- 5.44 The subject lands are not located in close proximity of any landscapes and sites of historical, cultural or archaeological significance and the proposal is not considered to result in any potential for negative impacts on archaeology, as summarised in the IAC report which concludes as follows:

“The proposed development area has been subject to a large amount of disturbance. It is highly likely that if any archaeological deposits survived within the site, they have since been removed. As such no negative impacts are predicted upon the archaeological resource as a result of the development going ahead.”

Interactions of the Foregoing

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

3. A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from—

(a) the expected residues and emissions and the production of waste, where relevant, and

(b) the use of natural resources, in particular soil, land, water and biodiversity.

- 5.46 It is expected that there will be some normal residues/emissions during the demolition and construction stage associated with the development works proposed which include demolition of existing buildings, ground preparation works, development of site infrastructure, road Infrastructure works, construction of buildings and hardstanding areas and landscaping of the site including open soft landscaped areas.
- 5.47 Standard mitigation measures will be employed and monitored during the construction phase. As such residues and emissions are not considered likely to have potential to cause significant effects on the environment.
- 5.48 There will be some waste materials produced in the construction of the proposed scheme and the demolition of the existing buildings on site 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.
- 5.49 There will be no large use of natural resources associated with the proposed development which might result in a significant environmental impact. The main use of natural resources will be land which is zoned for residential development.
- 5.50 Other resources used will be construction materials which will be typical raw materials used in construction of residential developments. The scale and

quantity of the materials used will not be such that would cause concern in relation to significant effects on the environment.

- 5.51 The construction or operation of the scheme would not use such a quantity of water to cause concern in relation to significant effects on the environment. The use of natural resources in relation to the proposed development is not likely to cause significant effects on the environment

4. The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7.

- 5.52 Schedule 7 of the Planning and Development Regulations 2001 (as amended) details the criteria for determining whether sub-threshold development listed in Part 2 of Schedule 5 should be subject to an environmental impact assessment.
- 5.53 It is considered that there are no likely significant effects on the environment in terms of each of the chapter headings, individually or cumulatively.

Type and Characteristics of Potential Impacts

Could the type and nature of characteristics of the magnitude and spatial extent of the impact (for example on a geographical area and size of the population likely to be affected) be considered to be likely to cause significant effects on the environment?

- 5.54 The proposed development is located in an urban context. The proposed uses are consistent with land in such a location and represent a high quality and more compatible and sustainable land use to that currently existing at the site. The works during the construction phase may have a minor impact on the immediate area, however, neighbouring residential development is sufficiently set back from site boundaries for these impacts to be reduced.
- 5.55 The works during construction or the operational phase are not of such a scale or extent that would be considered to be likely to cause significant effects on the environment in the geographic area or on any considerable quantum of the population in the vicinity.

Could the type and characteristics of the transboundary nature of the impact be considered to be likely to cause significant effects on the environment?

- 5.56 Any minor impacts will be contained in the immediate vicinity of the site. The subject lands are not located on any geographical or other boundary of relevance to assessment of likely significant effects on the environment.

Could the type and characteristics of the intensity and complexity of the impact be considered to be likely to cause significant effects on the environment?

- 5.57 The proposed development is not of any significant intensity or complexity such that would be likely to cause significant effects on the environment.

Could the type and characteristics of the probability of the impact be considered to be likely to cause significant effects on the environment?

- 5.58 It is likely that the minor impact of noise and pollution during the construction phase will occur; however, construction works in an urban environment are entirely normal and working hours will be limited generally to hours set by condition or as otherwise agreed. All works carried out will be undertaken in accordance with the content of the management plans submitted alongside this request for pre-application consultation.

Could the type and characteristics of the expected onset, duration, frequency and reversibility of the impact be likely to cause significant effects on the environment?

- 5.59 Any of the minor impacts identified would occur during the construction phase, there are no significant negative impacts considered to occur during the operational phase. The frequency will vary throughout the construction phase; however, the impact is still not considered to be significant. The minor impacts will be temporary so will be reversible. The construction of the development would be on brownfield land and the development would be reversible similar its present state.

Could the type and characteristics of the cumulation of the impact with the impact of other existing and/or development the subject of a consent for proposed development be likely to cause significant effects on the environment?

- 5.60 The subject site is zoned land designated for development. The proposed build to rent scheme and associated commercial uses falls under the permissible uses set out for these lands and is therefore considered acceptable at the location. The development and regeneration of land is to be expected in an urban context in order to maximise land resource and deliver compact urban growth. The scale of the proposed scheme and any other permitted schemes in the vicinity are not such that the characteristic of any potential impacts in culmination with each other are likely to cause significant effects on the environment. This has been verified by the Appropriate Assessment Screening Report carried out by Openfield which accompanies this submission.

Could the type and characteristics of the possibility of effectively reducing the impact be likely to cause significant effects on the environment?

- 5.61 There are no significant mitigations measures or methods to be undertaken in order to reduce likely significant effects on the environment in order to complete the proposed scheme.
- 5.62 Any mitigations measures to manage noise, dust and/or pollution during the demolition, construction and operational phases are subject to standard policies and practices. Please refer to the associated Demolition Method Statement, Outline Construction Management Plan and Demolition, Construction, and Operational Waste Management Plan prepared by JOR Consulting Engineers for further details.

6.0 SUMMARY & CONCLUSIONS

- 6.1 This Environmental Impact Assessment Screening Report has been prepared to accompany this Strategic Housing Development application to An Bord Pleanála for a build to rent development comprising 331 build to rent units, commercial units, a childcare facility, and associated development at Malahide Road, Dublin 17.
- 6.2 The report has assessed the potential impact of the proposed development on the environment in response to the requirements of the Regulations and Section 11 of the SHD application form. The proposed development is substantially below the thresholds for a mandatory EIAR. The screening exercise has been completed in this report and the methodology used has been informed by the available guidance, legislation and directives.
- 6.3 It is considered that a sub threshold EIAR is not required for the proposed development for the following reasons as set out in this screening exercise:
- The proposal falls significantly below the thresholds of Schedule 5 of the Planning and Development Regulations 2001-2018;
 - The site makes optimum use of a brownfield land resource and utilises existing servicing provision;
 - The development will be connected to public services such as water, foul and storm sewers;
 - The site will not have any significant impact on any protected environmental sites.
 - Surface water is to be directed through the public surface water system which ultimately enters Dublin Bay. Surface water will be subject to oil and hydrocarbon filters and attenuated in the proposed surface water system for the proposed scheme;
 - The proposed drainage strategy will contribute to improved retention of surface water on site through rainwater harvesting and attenuation;
 - Standard demolition and construction practices will be employed to mitigate any risk of noise, dust or pollution;
 - No identified impact in this screening exercise, cumulatively or individually is considered to likely cause significant effects on the environment.
- 6.4 A Screening Report for Appropriate Assessment has been prepared by Openfield Ecological Services. The AA Screening Report concluded that an assessment of the aspects of the project has shown that significant negative effects are not likely to occur to any SAC or SPA sites either alone or in combination with other plans and projects.
- 6.5 In conclusion, it is considered that the proposed development will not have any significant impacts on the environment. All recommended mitigation measures and standard practices will be employed throughout the construction and operation phase of the development to ensure that the

proposed development will not create any significant impacts on the quality of the surrounding environment.