Enviroguide
a DNV company

enviroguide.ie

EIA Screening Report

PRESENTED TO

Malclose Ltd.
Proposed student accommodation development

DATE

October 2023

Environmental Consultancy Services

DOCUMENT CONTROL SHEET

Client	Malclose Ltd.
Project Title	Proposed student accommodation development
Document Title	EIA Screening Report

Rev.	Status	Author(s)	Reviewed by	Approved by	Issue Date
01	Draft for internal review	Louise Hewitt *Environmental Consultant* Mairéad Foran *Senior Environmental Consultant*	Claire Fagan *Planning Consultant*	Harry Parker *Technical Director*	17/05/2023
02	Draft for Client	Louise Hewitt *Environmental Consultant* Mairéad Foran *Senior Environmental Consultant*	Claire Fagan *Planning Consultant*	Harry Parker *Technical Director*	18/05/2023
03	Final for Pre-Application	Louise Hewitt *Environmental Consultant* Mairéad Foran *Senior Environmental Consultant*	Harry Parker *Technical Director*	Harry Parker *Technical Director*	24/05/2023
04	Draft for internal review	Louise Hewitt *Environmental Consultant*	Claire Fagan *Planning Consultant*	Harry Parker *Technical Director*	30/08/2023
05.	Draft for client review	Louise Hewitt *Environmental Consultant*	Claire Fagan *Planning Consultant*	Harry Parker *Technical Director*	04/09/2023
06.	Final	Louise Hewitt *Environmental Consultant*	Claire Fagan *Planning Consultant*	Harry Parker *Technical Director*	23/10/2023

REPORT LIMITATIONS

Synergy Environmental Ltd. t/a Enviroguide Consulting (hereafter referred to as "Enviroguide") has prepared this report for the sole use of Malclose Ltd. in accordance with the Agreement under which our services were performed. No other warranty, expressed or implied, is made as to the professional advice included in this Report or any other services provided by Enviroguide.

The information contained in this Report is based upon information provided by others and upon the assumption that all relevant information has been provided by those parties from whom it has been requested and that such information is accurate. Information obtained by Enviroguide has not been independently verified by Enviroguide, unless otherwise stated in the Report.

The methodology adopted and the sources of information used by Enviroguide in providing its services are outlined in this Report.

The work described in this Report is based on the conditions encountered and the information available during the said period of time. The scope of this Report and the services are accordingly factually limited by these circumstances.

All work carried out in preparing this report has used, and is based upon, Enviroguide's professional knowledge and understanding of the current relevant national legislation. Future changes in applicable legislation may cause the opinion, advice, recommendations or conclusions set-out in this report to become inappropriate or incorrect. However, in giving its opinions, advice, recommendations and conclusions, Enviroguide has considered pending changes to environmental legislation and regulations of which it is currently aware. Following delivery of this report, Enviroguide will have no obligation to advise the client of any such changes, or of their repercussions.

Enviroguide disclaim any undertaking or obligation to advise any person of any change in any matter affecting the Report, which may come or be brought to Enviroguide's attention after the date of the Report.

Certain statements made in the Report that are not historical facts may constitute estimates, projections or other forward-looking statements and even though they are based on reasonable assumptions as of the date of the Report, such forward-looking statements by their nature involve risks and uncertainties that could cause actual results to differ materially from the results predicted. Enviroguide specifically does not guarantee or warrant any estimate or projections contained in this Report.

Unless otherwise stated in this Report, the assessments made assume that the site and facilities will continue to be used for their current or stated proposed purpose without significant changes.

The content of this report represents the professional opinion of experienced environmental consultants. Enviroguide does not provide legal advice or an accounting interpretation of liabilities, contingent liabilities or provisions.

If the scope of work includes subsurface investigation such as boreholes, trial pits and laboratory testing of samples collected from the subsurface or other areas of the site, and environmental or engineering interpretation of such information, attention is drawn to the fact that special risks occur whenever engineering, environmental and related disciplines are applied to identify subsurface conditions. Even a comprehensive sampling and testing

programme implemented in accordance with best practice and a professional standard of care may fail to detect certain conditions. Laboratory testing results are not independently verified by Enviroguide and have been assumed to be accurate. The environmental, ecological, geological, geotechnical, geochemical and hydrogeological conditions that Enviroguide interprets to exist between sampling points may differ from those that actually exist. Passage of time, natural occurrences and activities on and/or near the site may substantially alter encountered conditions.

Table of Contents

LIST OF TABLES

LIST OF FIGURES

1 INTRODUCTION

1.1 Background

Enviroguide have been commissioned by Thornton O'Connor Town Planning on behalf of Malclose Ltd. (the Applicant) to prepare an Environmental Impact Assessment (EIA) Screening report in relation to a proposed student accommodation development (the Proposed Development) at Gowan House, Nass Road, Dublin 12 (the Site).

The purpose of this report is to provide information to assist the relevant competent authority to carry out a screening for Environmental Impact Assessment (EIA).

1.1.1 Author Competency

This EIA Screening has been prepared by Louise Hewitt, Environmental Consultant, Enviroguide. Louise has a Master of Science (Hons) in Environmental Resource Management from University College Dublin and a Bachelor of Science (Hons) in Biology from Maynooth University. Louise has worked as an Environmental Consultant with Enviroguide since 2021 and has experience preparing Environmental Impact Assessment (EIA) Screening Reports and a range of chapters for Environmental Impact Assessment Reports (EIARs) of a similar scale and nature to the Proposed Development.

This EIA Screening has also been prepared by Mairéad Foran, Senior Environmental Consultant. Mairéad has a B.A. (Moderatorship) in Environmental Sciences from Trinity College Dublin, and an Advanced Diploma in Planning and Environmental Law from King's Inns College, Dublin. Mairéad has over five years professional experience as an Environmental Consultant and has experience working on a large number of EIARs and EIA Screening Reports for projects of a similar scale to that of the Proposed Development.

This EIA Screening Report has been approved by Harry Parker, Technical Director and EIA Lead at Enviroguide. Harry is an environmental consultant with 16 years' experience in consultancy, specialising in EIAs for large-scale residential and commercial developments, working closely with a range of developers, planning consultants and architects within the public and private sector. Harry has a MA in Environmental Impact Assessment and Management from the University of Manchester, UK.

1.2 Screening Objective

The overall objective of this Screening for EIA is to identify and assess the potential for likely significant environmental effects associated with the Proposed Development and to determine if a statutory EIA is required for the Proposed Development.

The requirement for a statutory EIA is set out in the mandatory and discretionary provisions of the Planning and Development Act, 2000 (as amended) (the Act) and in Schedule 5 of the Planning and Development Regulations, 2001 as amended (the Regulations).

Projects listed in Schedule 5, Part 1, of the Regulations, will be subject to mandatory assessment (Article 4(1) of Directive 2011/92/EU as amended by Directive 2014/52/EU (together, the EIA Directive)) as they are deemed as projects which are likely to have a significant effect.

Others, listed in the Schedule 5, Part 2 of the Regulations, contain threshold levels and criteria and for projects that fall below these thresholds and criteria, it is the decision of the competent authority to decide if an EIA (and the associated Environmental Impact Assessment Report (EIAR)) is required.

Whether a 'sub-threshold' development should be subject to EIA is determined by the likelihood that the development would result in likely significant environmental effects. Significant effects may arise due to the nature of the development, its scale or extent and its location in relation to the characteristics of the receiving area, particularly sensitive environments.

This report documents the methodology employed to complete the screening exercise, having regard to relevant legislation and guidance documents. It also sets out a clear rationale for each decision of this screening exercise. The following documents were consulted:

- Advice Notes on Current Practice in the Preparation of Environmental Impact Statements (EPA 2003);
- Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EPA May 2022);
- Environmental Assessments of Plans, Programmes and Projects – Rulings of the Court of Justice of the European Union (European Union 2017);
- Environmental Impact Assessment of Projects – Guidance on Scoping (Directive 2011/92/EU as amended by 2014/52/EU) (European Union 2017);
- Guidance of Integrating Climate Change and Biodiversity into Environmental Impact Assessment (European Union 2013);
- Environmental Impact Assessment of Projects – Guidance on the preparation of the Environmental Impact Assessment Report (European Union 2017);
- European Commission 2017. Environmental Impact Assessment of Projects Guidance on Screening (Directive 2011/92/EU as amended by 2014/52/EU);
- EU Commission Guidance on Interpretation of definitions of project categories of annex I and II of the EIA Directive (2015);
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (Government of Ireland 2018);
- Key Issues Consultation Paper on the Transposition of 2014 EIA Directive (2014/52/EU) in the Land Use Planning and EPA Licencing Systems; (Department of Housing, Planning, Community and Local Government 2017);
- Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions (European Communities 1999);
- Implementation of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (European Communities 2003); and
- Office of the Planning Regulator (OPR) Environmental Impact Assessment Screening Practice Note (2021).

2 DESCRIPTION OF THE PROPOSED DEVELOPMENT

2.1 Site Overview

The site of the Proposed Development (hereafter referred to as the Site), as shown in Figure 2-1, is 0.962 hectares in area and is located on the R810 (Naas Road).

The Site is located within the Carriglea Industrial Estate and is bounded on all sides by commercial properties. The surrounding area to the west is predominantly commercial and industrial in nature with residential developments located to the north, south and east. Landsdowne Gate Apartments are located approximately 180 m to the southeast of the Site and a proposed mixed-use residential development in the former Corant Logistics site under ABP Reg. Ref. 311606 is located directly to the south of the Site in Carriglea Industrial Estate and is under construction.

The Site is currently accessed in the south-west corner by an unnamed cul de sac for both vehicles and pedestrians. A public footpath adjoins the northern and western site boundary.

The Site currently comprises the existing Peugeot Ireland (Gown Distributors Ltd) industrial site at Gowan House, Naas Rd, Walkinstown, Dublin, D12 RCC4, a two-storey equivalent warehouse building and 131 No. surface car-parking spaces. The Concorde Industrial Estate is located to the west of the Site.

Under the Dublin City Council Development Plan (DCCDP) 2022-2028, the Site is zoned as "*Z14 – Strategic Development and Regeneration Areas (SDRAs)*". The objective of Z14 is "*to seek the social, economic and physical development and/or regeneration of an area with mixed-use, of which residential would be the predominant use*".

There are no archaeological sites relating to the Sites and Monuments Records, national Inventory of Architectural Heritage or the Record of Monuments and Places within the Site boundary. The site is not located within an Architectural Conservation Area (ACA) and the building to be demolished is not listed as a protected structure.

Under the DCCDP 2022-2028, the site is not located in either Flood Zone A or B and by default is located in Flood Zone C where the "probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1000 for both river and coastal flooding) (Office of Public Works, 2009).

A culverted section of the River Camac runs diagonally through the site, flowing in a south-easterly direction. The Grand Canal is located approximately 578m north of the Site.

Drimnagh Castle is located approximately 320m southeast and Drimnagh Castle Primary and Secondary schools are located approximately 450m to the south of the Site at Long Mile Road.

Refer to Figure 2-1 and Figure 2-2 for the site location map and site layout map.

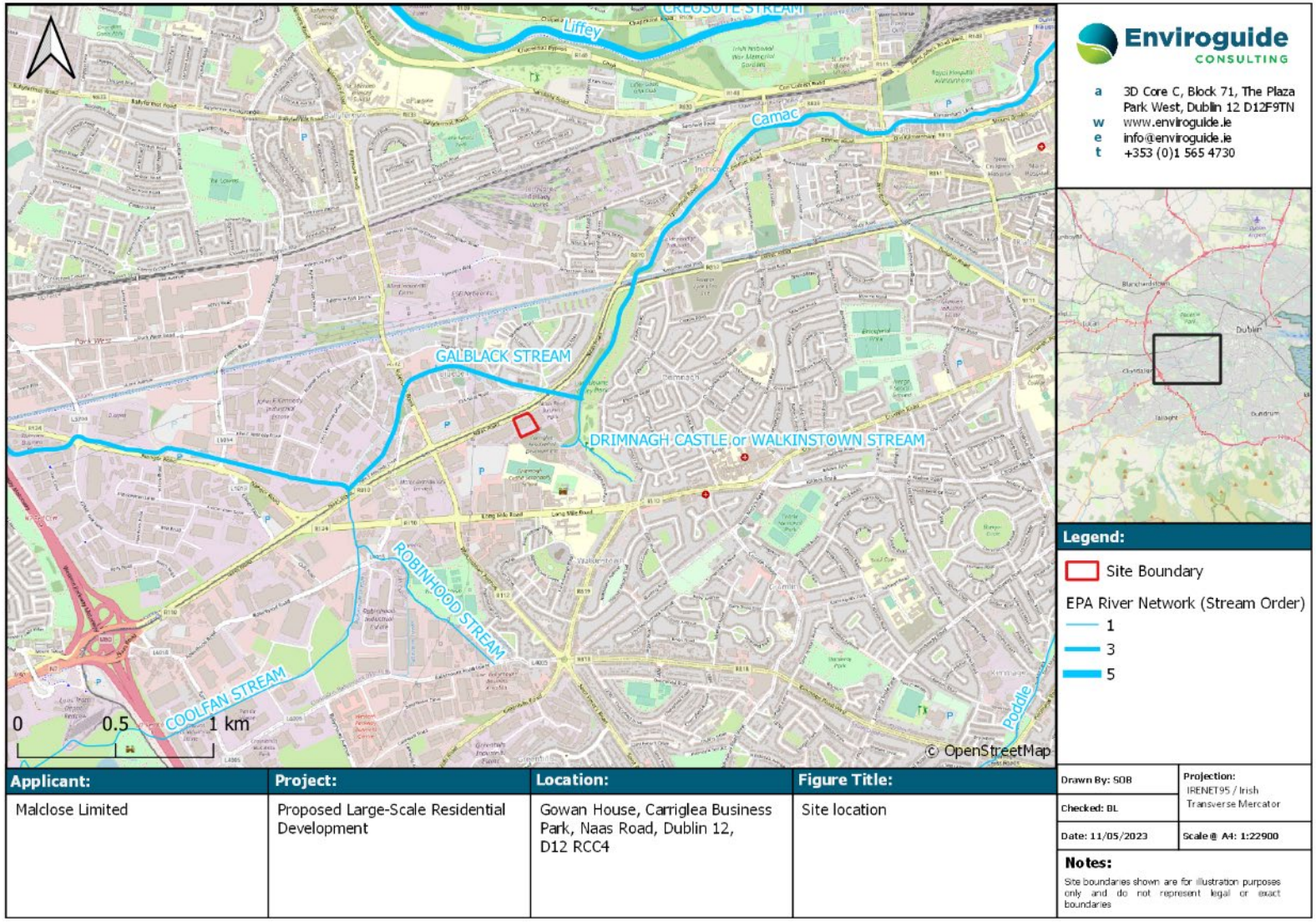

Figure 2-1 Site Location Plan

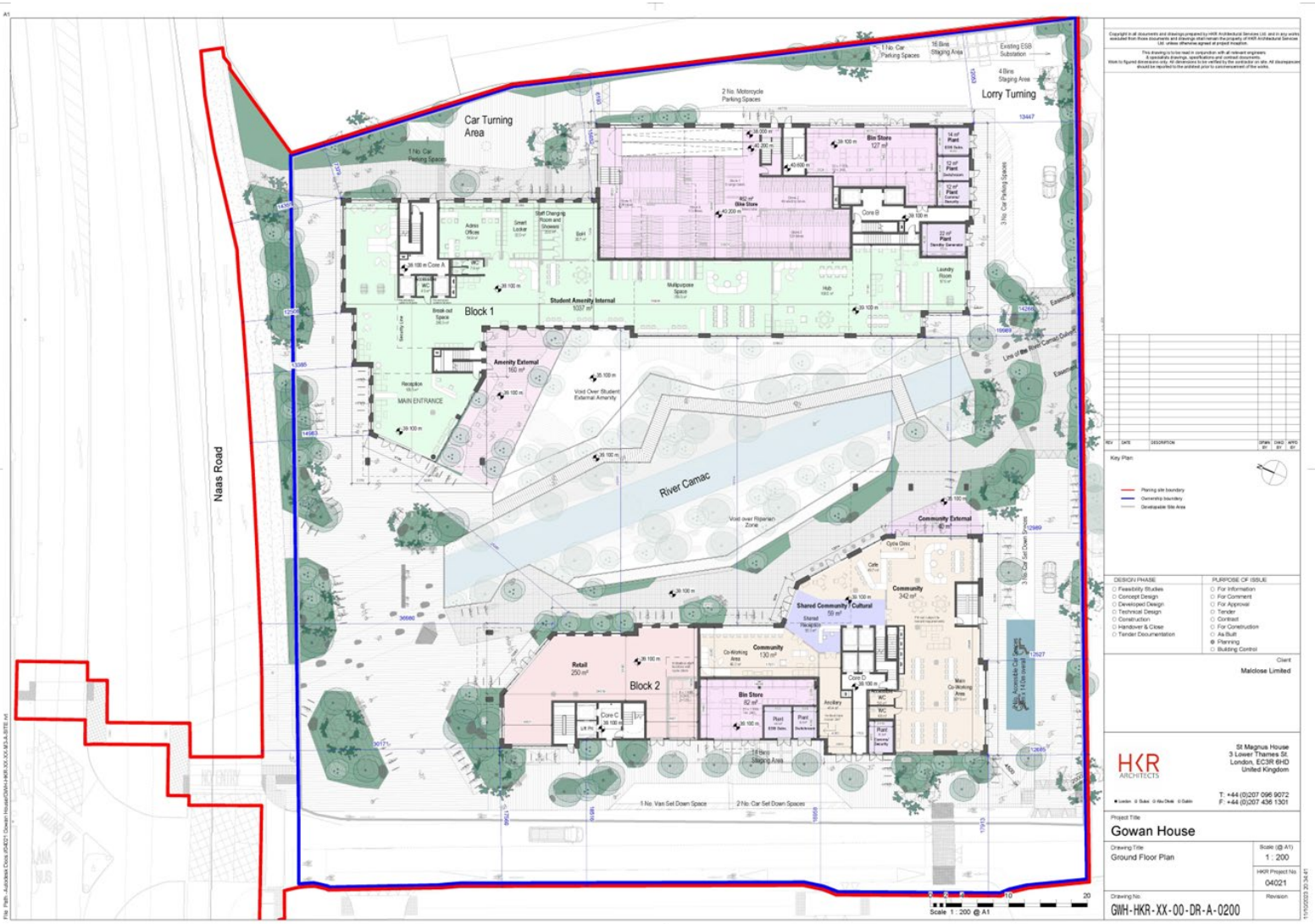

Figure 2-2 Site Layout (GWH-HKR-XX-00-DR-A-0200, HKR Architects, 2023)

2.2 Site Planning History

The Site lies within the administrative jurisdiction of Dublin City Council.

Having regard to the distance, and intervening built up areas, between the Site and the bordering county council areas of Fingal and Dun Laoghaire Rathdown, it is not considered the planning history from adjoining councils will have any likely significant effects on the Site. Therefore, the planning history for the Site was reviewed from data sources including:

- Dublin City Council planning website: https://www.dublincity.ie/residential/planning/planning-applications
- An Bord Pleanála website, http://www.pleanala.ie/
- EIA Portal, as provided by the Department of Housing, Planning and Local Government:https://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=d7d5a3d48f104ecbb206e7e5f84b71f1

Table 2-1 provides an overview of planning history within the Site boundary:

Table 2-1: Summary of Planning History at Site

Application Reg. Ref.	Location	Development Proposal	Decision
WEB1624/23	On the public footpath on the southern side of the Naas Road, Dublin 12 in front of Gowan House	The retention of the existing scrolling internally illuminated double sided 'Metropole' advertising display case mounted on an offset leg.	Decision Pending Registered: 26 Jul 2023
6807/06	Public footpath on the southern side of the Naas Road, Dublin 12, located in front of Citroen Cars (Gowan House) and opposite the Eircom Business Systems Building (LAN Communications).	A metropole double sided, internally illuminated advertisement structure comprising a display case mounted on an offset leg. The structure shall display civic information or an advertisement. The display panels shall be scrolling or static. The structure has an overall height of 4.85 metres and a width of 3.48 metres. The area of each of the display panels is 6.82msq.	GRANT PERMISSION 08 May 2007
6019/04	Gowan House, Carraiglea Industrial Estate, Naas Road, Dublin 12	Planning Permission is sought by Gowan Distributors Ltd. for demolition of a canopy and loading area, change of use of part of warehouse to showroom with mezzanine storage over, construction of a two storey extension comprising offices and showroom, a vehicular platform at the existing loading dock, associated	GRANT PERMISSION 31 Mar 2005

Application Reg. Ref.	Location	Development Proposal	Decision
		signage and external ventilation equipment, all at the North elevation of Gowan House and ancillary to the existing warehouse use at Gowan House, Carraiglea Industrial Estate, Naas Road, Dublin 12.	
4527/04	Gowan Distributors Limited	Planning Permission is sought by Gowan Distributors Ltd. for demolition of a canopy and loading area, change of use of part of warehouse to showroom with mezzanine storage over, construction of a two storey extension comprising offices and showroom, a vehicular platform at the existing loading dock, associated signage and external ventilation equipment, all at the north elevation of Gowan House and ancillary to the existing warehouse use at Gowan House, Carriglea Industrial Estate, Naas Road, Dublin 12.	REFUSE PERMISSION 03 Nov 2004
0433/97	Gowan House, Naas Road, Dublin 12.	Covered loading dock extension to the warehouse on the Naas Road facade, new two storey reception extension at the main entrance, new bicycle shed, relocation of existing compactor, associated alterations to the site layout and car parking.	GRANT PERMISSION 18 Jun 1997
2269/96	Gowan House, Naas Road, Dublin 12.	Two-storey ancillary offices within the existing building envelope with associated windows on the eastern elevation and an external boiler house.	GRANT PERMISSION 06 Feb 1997
0138/96	Gowan House, Naas Road, Dublin 12.	Change of use from warehouse and office to office usage and additional internal two-storey offices.	SPLIT DECISION (PERMISSION & REFUSAL) 14 May 1996

2.3 Principal Features of the Proposed Development

The Applicant is applying for permission for a large-scale residential development (LRD) principally comprising student accommodation at this 0.962 Ha site at Gowan House, Carriglea Business Park, Naas Road, Dublin 12, D12 RCC4.

Works to upgrade of the access road to the west of the site on an area measuring c. 0.081 Ha are also proposed comprising new surfacing to the carriageway, the provision of inbound and outbound bicycle lanes from the development entrance to the Naas Road, the provision of a controlled pedestrian crossing on the access road at the Naas Road junction, and the provision of a further uncontrolled pedestrian and bicycle crossing linking the subject site with the approved Concorde SHD development (ABP Ref: TA29S.312218) to the west.

On the Naas Road, works are proposed on an area measuring c. 0.086 Ha comprising the realignment and widening of the existing pedestrian footpath along the westbound carriageway of the Naas Road and the provision of linkages from the realigned footpath to the development site, and the provision of new controlled pedestrian crossings across the eastbound and westbound carriages of the Naas Road and the provision of a new uncontrolled crossing of the Luas tracks.

The development site area and roadworks areas will provide a total application site area of c. 1.13 Ha.

The proposed development will principally consist of: the demolition of the existing two-storey office/warehouse building and outbuilding (5,172 sq m); and the construction of a development in two blocks (Block 1 (eastern block) is part 2 No. storeys to part 15 No. storeys over lower ground floor and basement levels with roof plant over and Block 2 (western block) is part 9 No. storeys to part 11 No. storeys over basement with roof plant over) principally comprising 941 No. Student Accommodation bedspaces (871 No. standards rooms, 47 No. accessible studio rooms and 23 No. studios) with associated facilities, which will be utilised for short-term lets during student holiday periods. The 871No. standard rooms are provided in 123 No. clusters ranging in size from 3 No. bedspaces to 8 No. bedspaces, and all clusters are served by a communal living/kitchen/dining room.

The development also provides: ancillary internal and external communal student amenity spaces and support facilities; cultural and community floor space (1,422 sq m internal and 131 sq m external) principally comprising a digital hub and co-working space with ancillary cafe; a retail unit (250 sq m); public open space; the daylighting of the culverted River Camac through the site; an elevated walkway above the River Camac at ground floor level; a pedestrian bridge link at first floor level between Blocks 1 and 2; vehicular access at the south-western corner; the provision of 7 No. car-parking spaces, 2 No. motorcycle parking spaces and 2 No. set down areas; bicycle stores at ground and lower ground floor levels; visitor cycle parking spaces; bin stores; substations; hard and soft landscaping; green and blue roofs; new telecommunications infrastructure at roof level of Block 1 including antennas and microwave link dishes, 18 No. antennas and 6 No. transmission dishes, together with all associated equipment; boundary treatments; plant; lift overruns; and all associated works above and below ground.

The gross floor area of the development is c. 33,140 sq m comprising c. 30,386 sq m above lower ground and basement level.

2.3.1 Demolition Phase

The demolition phase will involve the removal of the two-storey office/warehouse building and outbuilding (5,172 sq m). A detailed asbestos survey will be carried prior to the commencement of demolition works.

A formal demolition plan including safety procedures will be prepared by the demolition contractor. However, in general, the following sequence of works should be followed during the demolition stage:

Check for Hazards

Prior to commencing works, buildings and structures to be demolished will be checked for any likely hazards including asbestos, ACMs, electrical power lines or cables, gas reticulation systems, telecommunications, unsafe structures and fire / explosion hazards, e.g. combustible dust, chemical hazards, oil, fuels and contamination.

Removal of Components

All hazardous materials will be removed first. All components from within the buildings that can be salvaged will be removed next. This will primarily be comprised of metal; however, may also include timbers, doors, windows, wiring and metal ducting, etc.

Removal of Roofing

Steel roof supports, beams will be dismantled and taken away for recycling / salvage.

Excavation of Services, Demolition of Walls and Concrete

Services will be removed from the ground and the breakdown of walls will be carried out once all salvageable or reusable materials have been taken from the buildings. Finally, any existing foundations and hard standing areas will be excavated (RWMP, AWN Consulting,2023).

2.3.2 Construction Phase

The construction programme is intended to commence in Q3 2024 with a 36-month programme.

The project will involve the excavation of existing building foundations and preparation for new deeper foundations to be installed. Subject to detailed planning at the construction stage, it is currently envisaged that the construction compound, offices and storage areas will be located at one of the indicated locations in Figure 2-3.

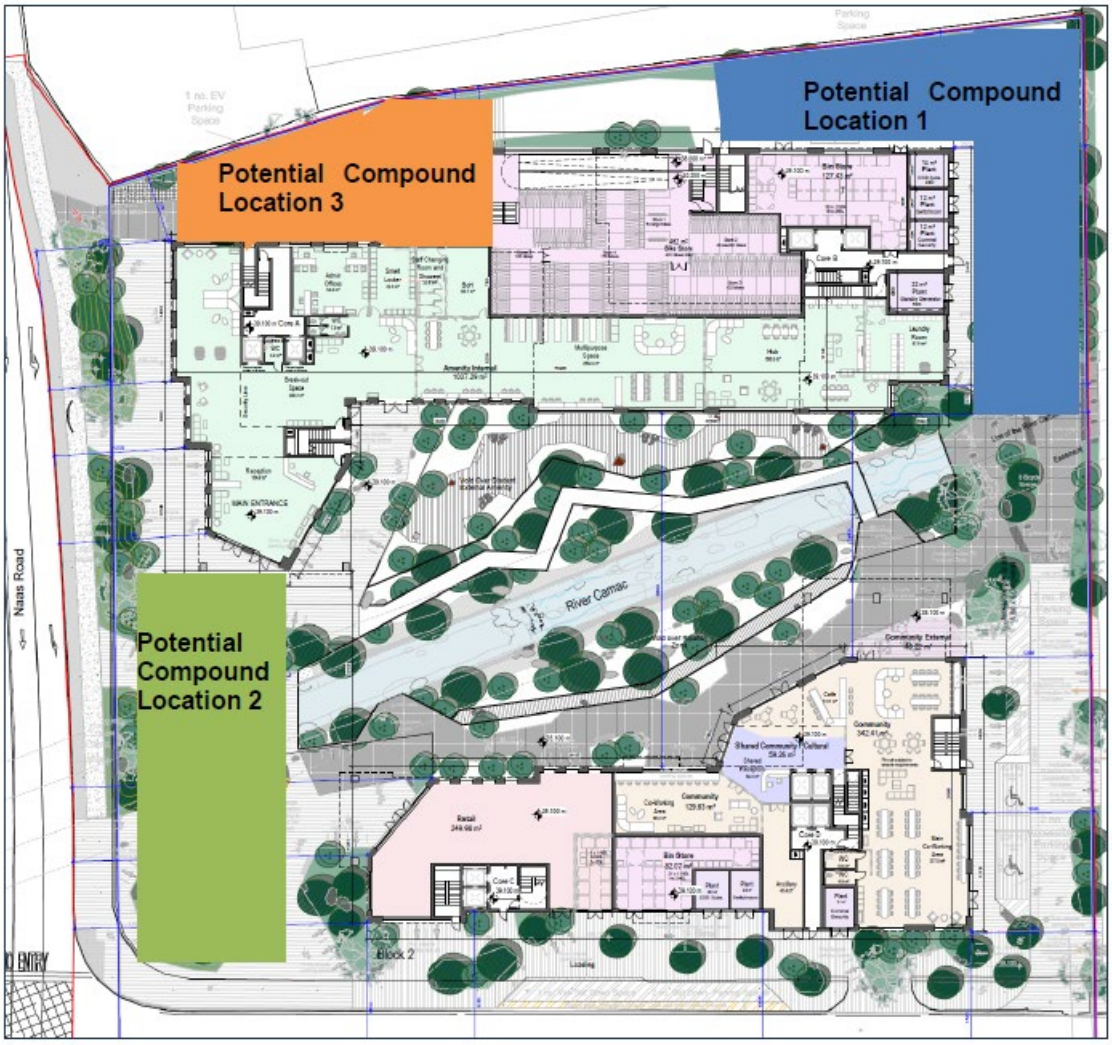

Figure 2-3 Proposed Locations For Site Compound

2.3.3 Daylighting of the River Camac

A culverted section of the River Camac runs diagonally through the site, flowing in a south-easterly direction. As part of the Proposed Development approximately 76m of the river Camac will be de-culverted or daylighted.

Construction methodology has been prepared by BMCE for daylighting the culvert (Drawing number: GWH-BMD-ZZ-XX-DR-C-1005, GWH-BMD-ZZ-XX-DR-C-1013 and GWH-BMD-ZZ-XX-DR-C-1014). The existing culvert will be excavated from the existing ground level to the base of the culvert exposing the roof and side walls of the culvert. The roof of the culvert will be cut into sections and lifted off by a mobile crane.

3 EIA Screening Process

3.1 Introduction

The scope of the EIA screening process is to identify any potential effects associated with the Proposed Development that may arise during Construction and Operational Phases and seek

to identify these likely significant effects to confirm whether or not the need for an EIA is triggered. Screening is defined in Environmental Protection Agency (EPA) Guidelines on the information to be contained in Environmental Impact Assessment Reports as:

"The process of assessing the requirement for a project to be subject to Impact Assessment based on project type and scale, as well as the significance or environmental sensitivity of the receiving environment.' (EPA, May 2022)"

3.2 Legislative Requirements for an EIA

Directive 2011/92/EU (as amended by Directive 2014/52/EU (together, the EIA Directive) was enacted as a means to assess the effects of projects on the environment, and to properly ensure that any potential significant effects are assessed before a project proceeds. Annex 1 of the EIA Directive defines mandatory projects that require an Environmental Impact Assessment Report (EIAR) (formerly EIS) and Annex II of the EIA Directive lists projects which do not necessarily have significant effects but can be subject to case-by-case analysis or thresholds to be determined by member states. Section 172 of the Planning and Development Act 2001, as amended, provides the legislative basis for mandatory EIA. It states the following:

> *"An environmental impact assessment shall be carried out by the planning authority or the Board, as the case may be, in respect of an application for consent for proposed development where either —*
>
> *(a) the proposed development would be of a class specified in —*
>
> *(i) Part 1 of Schedule 5 of the Planning and Development Regulations 2001, and either —*
>
> *(I) such development [would equal or exceed, as the case may be,] any relevant quantity, area or other limit specified in that Part, or*
>
> *(II) no quantity, area or other limit is specified in that Part in respect of the development concerned,*
>
> *or*
>
> *(ii) Part 2 [(other than subparagraph (a) of paragraph 2)] of Schedule 5 of the Planning and Development Regulations 2001 and either —*
>
> *(I) such development [would equal or exceed, as the case may be,] any relevant quantity, area or other limit specified in that Part, or*
>
> *(II) no quantity, area or other limit is specified in that Part in respect of the development concerned,*
>
> *or*
>
> (ii) *Part 2 [(other than subparagraph (a) of paragraph 2)] of Schedule 5 of the Planning and Development Regulations 2001 and either —*

(I) such development [would equal or exceed, as the case may be,] any relevant quantity, area or other limit specified in that Part, or

(II) no quantity, area or other limit is specified in that Part in respect of the development concerned,

or

(b) (i) the proposed development would be of a class specified in Part 2 of Schedule 5 of the Planning and Development Regulations 2001 but F594 [does not equal or exceed, as the case may be,] the relevant quantity, area or other limit specified in that Part, and

(ii) it is concluded, determined or decided, as the case may be, —

(I) by a planning authority, in exercise of the powers conferred on it by this Act or the Planning and Development Regulations 2001 (S.I. No. 600 of 2001),

(II) by the Board, in exercise of the powers conferred on it by this Act or those regulations,

(III) by a local authority in exercise of the powers conferred on it by regulation 120 of those regulations,

(IV) by a State authority, in exercise of the powers conferred on it by regulation 123A of those regulations,

(V) in accordance with section 13A of the Foreshore Act, by the appropriate Minister (within the meaning of that Act), or

(VI) by the Minister for Communications, Climate Action and Environment, in exercise of the powers conferred on him or her by section 8A of the Minerals Development Act 1940,

that the proposed development is likely to have a significant effect on the environment."

In some cases, Member States have also established "exclusion" or "negative" lists specifying thresholds and criteria below which EIA is never required or below which a simplified EIA procedure applies. There may be exceptions to the negative thresholds, for example, for projects in defined sensitive locations. Such exceptions will apply in the case of Habitats Directive 92/43/EEC (as amended) assessments. The use of exclusion lists, defining thresholds below which EIA is never required, is very limited in the EU Member States.

Schedule 5 of the Planning and Development Regulations 2001, as amended outlines the legislative requirements deeming whether a project needs a mandatory EIA. Projects that automatically require an EIA included in Annex 1 of the EIA Directive are listed in Part 1 of Schedule 5 to the Planning and Development Regulations. Projects that are assessed either on a case-by-case examination or on the basis of set mandatory thresholds are defined under

Annex II of the EIA Directive, and these are transposed in Irish legislation in Schedule 5, Part 2 of the Planning and Development Regulations.

The Proposed Development at Gowan House, Nass Road, Dublin 12, D12 RCC4 is not listed as a development type in Schedule 5, Part 1 of the Planning and Development Regulations 2001 as amended and therefore a mandatory EIA is not required.

The Proposed Development is a project listed as a development type in Schedule 5, Part 2 of the Planning and Development Regulations 2001 as amended. The Proposed Development is considered a sub-threshold development as detailed below.

A sub-threshold development is defined as a "*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*". Sub threshold developments can be screened to determine if an EIA is required.

The Proposed Development does not meet the criteria set out in Schedule 5, Part 2 (10) (b) (i) of the Planning and Development Regulations 2001 as amended:

> ***10 (b) (i) Construction of more than 500 dwelling units.***

The Proposed Development totals 941 No. Student Accommodation bedspaces (871 No. standards rooms, 47 No. accessible studio rooms and 23 No. studios). The 871 No. standard rooms are provided in 123 clusters (dwelling units). It is therefore considered to fall under the 500 dwelling unit threshold.

The Proposed Development does not meet the criteria set out in Schedule 5, Part 2 (10) (b) (iv) of the Planning and Development Regulations 2001 as amended:

> ***10 (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.)***

The Proposed Development could constitute an 'urban development' as it is located within a built-up area. The Site is zoned as "*Z14 – Strategic Development and Regeneration Areas (SDRAs)*" in the Dublin City Council Development Plan (DCCDP) 2022-2028 and is therefore not classified as a business district. The Site can therefore be classed as being in "*other parts of a built-up area"* and the 10-hectare threshold applies accordingly. The total Site area and roadworks areas will provide a total application site area of c. 1.13 ha. which is below the applicable threshold and as such a mandatory EIA is not required.

The Proposed Development does not meet the criteria set out in Schedule 5, Part 2 (12) (c) of the Planning and Development Regulations 2001 as amended:

> ***12 (c) Holiday villages which would consist of more than 100 holiday homes outside built-up areas; hotel complexes outside built-up areas which would have an area of 20 hectares or more or an accommodation capacity exceeding 300 bedrooms***

The Proposed Development will be utilised for short-term lets during student holiday periods and does not fall under the category of holiday village or hotel. The primary use of the Proposed Development is for student accommodation.

The Proposed Development involves the demolition of the existing two-storey office/warehouse building. The Proposed Development has been reviewed having regard to the criteria set out in Schedule 5, Part 2 (14).

> ***14. 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.***

The Proposed Development will be reviewed having regard to the criteria set out in Schedule 5, Part 2 (15). The findings of this review will be detailed in this report's conclusions.

> ***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.***

The Proposed Development does not meet the thresholds to require a mandatory EIA as per Schedule 5 of the Planning and Development Regulations and is considered to be a sub-threshold development in the context of Irish legislation.

The criteria as set out in Schedule 7 and Schedule 7A has been incorporated into this EIA Screening Report. This EIA Screening concludes that the Proposed Development will not be likely to have significant effects on the environment as detailed in Sections 3.6 to 3.8.

Table 3-1 provides a summary of the legislative requirements for an EIA:

Table 3-1: Summary of EIA Activities

Class of Activity	Description of Activity Class	Summary Comments	EIA Required?
10 (b) (i)	*Construction of more than 500 dwelling units.*	The Proposed Development totals 941 No. Student Accommodation bedspaces (871 No. standards rooms, 47 No. accessible studio rooms and 23 No. studios). The 871 No. standard rooms are provided in 123 clusters (dwelling units). It is therefore considered to fall under the 500 dwelling unit threshold.	No
10 (b) (iv)	*Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares*	The total Site area is c.1.13 hectares in area which is below the applicable threshold of 10 hectares.	No

Class of Activity	Description of Activity Class	Summary Comments	EIA Required?
	in the case of other parts of a built-up area and 20 hectares elsewhere.		
12 (c)	*Holiday villages which would consist of more than 100 holiday homes outside built-up areas; hotel complexes outside built-up areas which would have an area of 20 hectares or more or an accommodation capacity exceeding 300 bedrooms*	The Proposed Development will be utilised for short-term lets during student holiday periods and does not fall under the category of holiday village or hotel.	No
14	*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.*	The Proposed Development involves the demolition of an existing building on the Site and will be reviewed having regard to the criteria set out in Schedule 5, Part 2 (14).	To be determined in the EIA Screening
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.*	The Proposed Development will be reviewed having regard to the criteria set out in Schedule 5, Part 2 (15).	To be determined in the EIA Screening

3.2.1 EIA Screening

The process of evaluating the likelihood of a project listed in Annex II requiring an assessment is called Screening. Figure 3-1, from The Environmental Impact Assessment of Projects, Guidance on Screening (Directive 2011/92/EU as amended by 2014/52/EU) (European Commission, 2017) provides the steps involved in the Screening process.

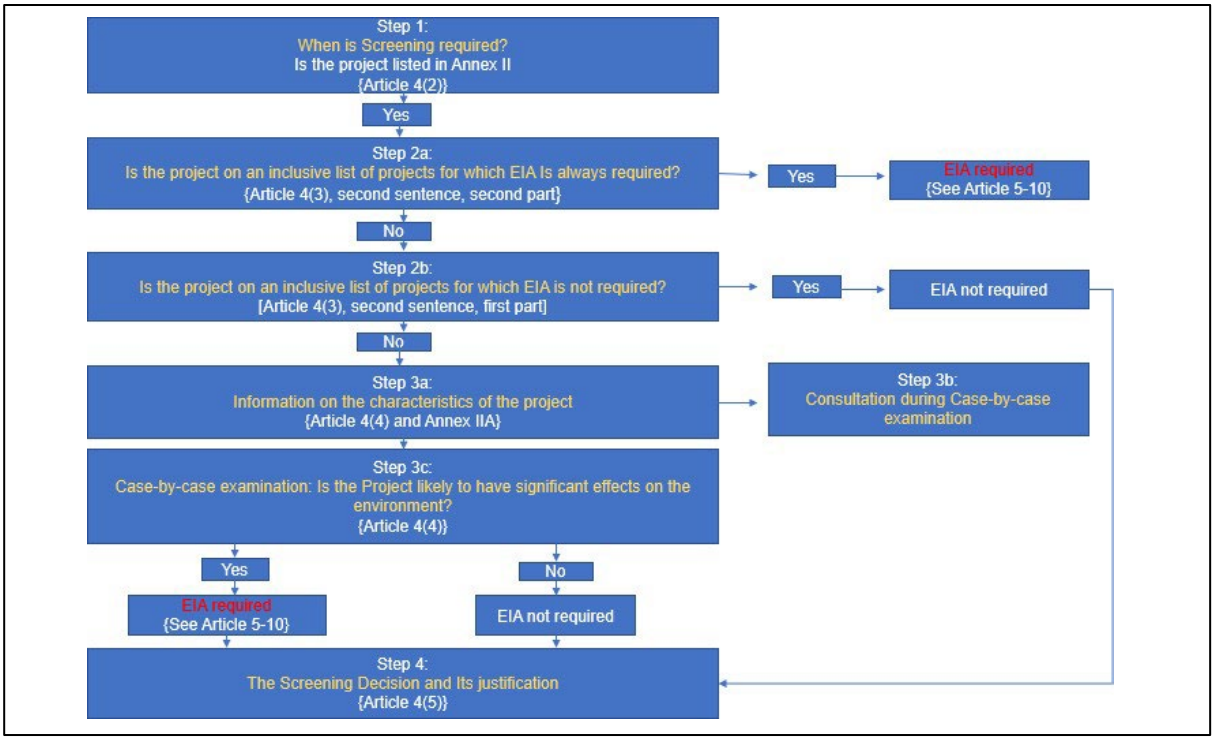

Figure 3-1 Flow Diagram of the Steps in Screening (Source: European Commission Environmental Impact Assessment of Projects, Guidance on Screening, 2017)

Annex III to the Directive sets out the criteria that must be considered in Screening. The *European Commission Environmental Impact Assessment of Projects, Guidance on Screening, 2017 document sets out checklists to support and help the process of deciding whether or not a Project is likely to have significant effects on the environment to help EIA participants to apply these criteria in case-by-case screening.*

This includes a Checklist of Criteria for Evaluating the Significance of Environmental Impacts.

This Checklist is designed to help users decide whether an EIA is required based on the characteristics of the likely impacts of the Proposed Development. As set out in the guidance document, the questions are designed so that a 'Yes' answer will generally point towards the need for an EIA process and a 'No' answer points to an EIA process not being required. The answer that the impact is uncertain would, most likely, point to the need for an EIA Process. Table 3-2 details the questions in the Checklist of Criteria for Evaluating the Significance of Environmental Impact, and provides an answer based on the findings of the following sections of this Screening Report (Section 4.1 to Section 4.3).

Table 3-2 Checklist of Criteria for Evaluating the Significance of Environmental Impact

Questions to be Considered	**Answer**
Will there be a large change in environmental conditions?	No. Refer to Section 4.1, Section 4.2 and Section 4.3 for further information.

Questions to be Considered	**Answer**
Will new features be out-of-scale with the existing environment?	No. Refer to Section 4.1 for further information.
Will the impact be unusual in the area or particularly complex?	No. Refer to Section 4.3 for further information.
Will the impact extend over a large area?	No. Refer to Section 4.1 for further information.
Will there be any potential for transboundary impact?	No. Refer to Section 4.3 for further information.
Will many people be affected?	No. Refer to Section 4.2 for further information.
Will many receptors of other types (fauna and flora, businesses, facilities) be affected?	No. Refer to Section 4.2 and Section 4.3 for further information.
Will valuable or scarce features or resources be affected?	No. Refer to Section 4.1 for further information.
Is there a risk that environmental standards will be breached?	No. Refer to Section 4.3 for further information.
Is there a risk that protected sites, areas, features will be affected?	No. Refer to Section 4.2 and 4.3 for further information.
Is there a high probability of the effect occurring?	No. Refer to Section 4.3 for further information.
Will the impact continue for a long time?	No. Refer to Section 4.3 for further information.
Will the effect be permanent rather than temporary?	No. Refer to Section 4.3 for further information.
Will the impact be continuous rather than intermittent?	No. Refer to Section 4.3 for further information.

Questions to be Considered	**Answer**
If it is intermittent, will it be frequent rather than rare?	No. Refer to Section 4.3 for further information.
Will the impact be irreversible?	No. Refer to Section 4.3 for further information.
Will it be difficult to avoid, or reduce or repair or compensate for the effect?	No. Refer to Section 4.3 for further information.

3.3 Sub-threshold Development

Sub-threshold development may still require an EIA process to be completed. The most important element to address in the possible assessment of a sub-threshold development and its requirement for an EIA is the likelihood of a project having any significant effects on the environment. Annex III of the EIA Directive sets out criteria to determine whether the projects listed in Annex II should be subject to an environmental impact assessment.

It is also set out in Schedule 7 to the Planning and Development Regulations, 2001 as amended. Within Schedule 7A, information to be provided by the Developer for the purposes of screening sub-threshold development for EIA includes:

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.

Within Schedule 7 of the Planning and Development Regulations, the characteristics under which a project must be considered in order to determine if an EIA is required includes:

1. **Characteristics of projects**

(a) the size and design of the whole of the proposed development;

(b) cumulation with other existing development and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment**;**

(c) the nature of any associated demolition works;

(d) the use of natural resources, in particular land, soil, water and biodiversity;

(e) the production of waste;

(f) pollution and nuisances;

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

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

2. **Location of projects**

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;

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

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

(i) wetlands, riparian areas, river mouths;

(ii) coastal zones and the marine environment;

(iii) mountain and forest areas;

(iv) nature reserves and parks;

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

(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;

(vii) densely populated areas;

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

3. Type and characteristics of the potential impact

The likely significant effects of projects on the environment must be considered in relation to criteria set out in points 1 and 2 of this Annex, with regard to the impact of the project on the factors specified in Article 3(1), taking into account:

(a) the magnitude and special 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 approved projects;

(h) the possibility of effectively reducing the impact.

The above criteria, as transposed in Schedule 7 of the Planning and Development Regulations, 2001 as amended, are grouped under three main headings, as follows:

1. Characteristics of the Proposed Development;

2. Location of the Proposed Development; and

3. Types and Characteristics of the Potential Impacts.

The layout of this EIA Screening Report is set out in accordance with these three headings, with sub-headings to assess the characteristics, location and potential effects of the Proposed Development.

In 2001, the European Commission published three EIA Guidance Documents concerning specific stages in the EIA process: Screening, Scoping, and Environmental Impact Statement Review. These documents have been updated and revised to reflect both the legislative changes brought about since the publication of the original guidance documents and the current state of good practice.

These three updated documents concern the following three specific stages of the EIA process:

- EIA Guidance Document on Screening;
- EIA Guidance Document on Scoping;
- EIA Guidance Document on the preparation of the EIA Report.

The European Commission publication of *Environmental Impact Assessment of Projects, Guidance on Screening (2017)* contains helpful checklists such as "Screening Checklist" and the "Checklist of Criteria for Evaluating the Significance of Environmental Impacts". The Checklists, as outlined in the Screening Guidance document, are designed to help users to determine the likely significant impacts of Projects and, in so doing, to decide whether an EIA is required, and states "*Those responsible for making Screening Decisions often find difficulties in defining what is 'significant'*. More detailed descriptions of this concept and methodological considerations to approach it are presented as part of the Scoping guidance document."

The methodology for the approach to determining "significance" in this EIA Screening Report has been informed by the Scoping guidance document.

4 Criteria For Determining Whether Development Listed In Part 2 Of Schedule 5 Should Be Subject To An Environmental Impact Assessment

4.1 Characteristics of the Proposed Development

4.1.1 Size of the Subject Site

The Site is c.1.13 hectares in size.

4.1.2 Nature of any associated demolition work

The Proposed Development will include the demolition of existing buildings on site.

4.1.3 Use of Natural Resources

The main use of resources will be the construction materials used during the Construction Phase of the Proposed Development. There will also be an increase in the use of energy (fuel for construction vehicles, electricity for tools) required for the removal of the waste generated during the Construction and Operational Phase of the Proposed Development.

The Proposed Development will be connected to the mains water supply. A Pre-Connection Enquiry has been submitted to Irish Water regarding the foul drainage (wastewater) and watermain connections (Reference number CDS22007711). A Confirmation of Feasibility letter was received from Irish Water on 30th November 2022. The proposed foul water connection from the site is feasible without system upgrades. However, the proposed water main connection will require upgrades. Subject to agreement with Irish Water it is proposed to provide a new watermain in accordance with Irish Water details, to serve the Proposed Development. Separate metered lines will be provided for the commercial unit (Barret Mahony, 2023).

The impact on the biodiversity of the Site will be minimised as far as practicable during the Construction and Operational Phase of the development. An Appropriate Assessment Screening Report has been prepared by Enviroguide which concluded there will be no significant impact on European Sites (August 2023).

A Climate Action, Energy and Sustainability Statement was prepared by Delap & Waller for the Proposed Development (August 2023). The Proposed Development will be designed and constructed to comply with the Nearly Zero Energy Building Standard (NZEB). This will ensure the building has a very high energy performance and minimises the use of natural resources and carbon output associated with the Proposed Development.

A culverted section of the River Camac runs diagonally through the site, flowing in a south-easterly direction. It is noted that the Proposed Development includes the daylighting of the culverted River Camac which flows through the Site. As part of the planning application for the adjacent Carriglea lands to the south which is under construction (DCC Planning Ref 2203/18), a detailed study of the River Camac was undertaken. The purpose of the study was to clearly identify the alignment and level of the River Camac as it runs beneath their site. The survey also included the site of the Proposed Development.

Therefore, it is not foreseen that any extensive use of natural resources (land, soil, water and biodiversity) is required for either the Construction or Operational Phase of the Proposed Development.

4.1.4 Production of Waste

All works carried out as part of the Proposed Development will comply with all Statutory Legislation including the Waste Management Act and Local Government (Water Pollution) Acts, and the contractor will co-operate in full with the Environmental Section of the Local Authority.

There will be an increase in waste in the form of demolitions and construction waste as a result of the Proposed Development due to site clearance and site enabling works. A Resource and Waste Management Plan (RWMP) has been prepared by AWN Consulting which details waste management strategies for the Demolition and Construction Phases. There will also be an increase in municipal waste produce during the Operational Phase. An Operational Waste

Management Plan (OWMP) has been prepared by AWN Consulting which details waste management strategies for the Operational Phase.

4.1.4.1 Demolition Phase

There will be waste materials generated from the demolition of the existing structures and hardstanding areas on site, as well as from the further excavation for the building foundations. There will be soil, stones, clay and made ground excavated to facilitate the construction of new foundations and underground services. The design team have estimated that c. 43,069m^3 of material will need to be excavated to do so. It is currently envisaged that 90% (c. 38,762.1m^3) of this material will need to be removed offsite due to the limited opportunities for reuse on site. This material will be taken for appropriate offsite reuse, recovery, recycling and / or disposal.

Demolition waste arising from the removal of the existing vacant building and further excavation for the building foundations have been detailed in this report. The estimated rates of reuse, recycling / recovery and disposal are also detailed and summarised in Table 3-2. The majority of demolition waste will be reused or recycled / recovered. An estimated 102.3 tonnes or 14% will be disposed of.

Table 4-1 Estimated off-site reuse, recycle and disposal rates for demolition waste (AWN Consulting, 2023)

Waste Type	Tonnes	Reuse		Recycle / Recovery		Disposal	
		%	Tonnes	%	Tonnes	%	Tonnes
Glass	30.1	0	0.0	85	25.6	15	4.5
Concrete, Bricks, Tiles, Ceramics	397.2	30	119.2	65	258.2	5	19.9
Plasterboard	31.2	0	0.0	80	24.9	20	6.2
Asphalts	7.8	0	0.0	25	1.9	75	5.8
Metals	116.8	5	5.8	80	93.5	15	17.5
Slate	62.3	0	0.0	85	53.0	15	9.3
Timber	77.9	10	7.8	40	31.2	50	38.9
Asbestos	0.0	0	0.0	0	0.0	100	0.0
Total	**723.2**		**132.8**		**488.2**		**102.3**

An asbestos demolition survey will be undertaken prior to the demolition of the existing building to identify any asbestos or asbestos containing materials (ACMs). If any ACM's are identified they will be required to be removed by a suitably trained and competent person prior to commencement of demolition work.

Removal of asbestos or ACMs will be carried out by a suitably qualified contractor and ACMs will only be removed from site by a suitably permitted / licenced waste contractor, in accordance with *S.I. No. 589 of 2010 Safety, Health and Welfare at Work (Exposure to Asbestos) Regulations 2006-2010.* All material will be taken to a suitably licensed or permitted facility.

4.1.4.2 Construction Phase

During the construction phase there may be a surplus of building materials, such as timber off-cuts, broken concrete blocks, cladding, plastics, metals and tiles generated. There may also be excess concrete during construction which will need to be disposed of. Plastic and cardboard waste from packaging and supply of materials will also be generated. The contractor will be required to ensure that oversupply of materials is kept to a minimum and opportunities for reuse of suitable materials is maximised.

Excavation will be required for site levelling and services. Volumes of excavated material will be minimal, and it is envisaged that any excavated material will be removed off site. If any material is removed off site, it will be taken for appropriate reuse, recycling or disposal.

Waste will also be generated from construction workers e.g., organic / food waste, dry mixed recyclables (wastepaper, newspaper, plastic bottles, packaging, aluminium cans, tins and Tetra Pak cartons), mixed non-recyclables and potentially sewage sludge from temporary welfare facilities provided on site during the construction phase. Waste printer / toner cartridges, waste electrical and electronic equipment (WEEE) and waste batteries may also be generated infrequently from site offices (AWN Consulting, 2023).

Construction waste arising from the Proposed Development have been detailed in the RWMP. The estimated rates of reuse, recycling / recovery and disposal are also detailed and summarised in Table 3-3. The predicted waste amounts are based on an average large-scale development waste generation rate per m^2. Until final materials and detailed construction methodologies have been confirmed, it is difficult to predict with a high level of accuracy the construction waste that will be generated. The majority of construction waste will be reused or recycled / recovered. An estimated 194.2 tonnes or 9% will be disposed of.

Table 4-2 Estimated off-site reuse, recycle and disposal rates for construction waste (AWN Consulting, 2023)

Waste Type	Tonnes	Reuse		Recycle/Recovery		Disposal	
		%	Tonnes	%	Tonnes	%	Tonnes
Mixed C&D	681.7	10	68.2	80	545.4	10	68.2
Timber	578.4	40	231.4	55	318.1	5	28.9
Plasterboard	206.6	30	62.0	60	123.9	10	20.7
Metals	165.3	5	8.3	90	148.7	5	8.3
Concrete	123.9	30	37.2	65	80.6	5	6.2
Other	309.9	20	62.0	60	185.9	20	62.0
Total	**2065.8**		**468.9**		**1402.7**		**194.2**

4.1.4.3 Hazardous Waste

Ground Investigation Ireland have undertaken ground investigations and prepared a waste classification report for the Site in July 2023. A selection of samples were collected and analysed to assess the total pollutant content for classification of materials as hazardous or non-hazardous.

Asbestos fibres were detected in 1 no. sample however the level detected was below the hazardous level of 0.1%. In the event that Asbestos Containing Materials (ACMs) are found within the excavated material, the removal will only be carried out by a suitably permitted waste contractor, in accordance with the Safety, Health and Welfare at Work (Exposure to Asbestos) Regulations 2006-2010. All asbestos will be taken to a suitably licensed or permitted facility.

In the event that hazardous soil, or historically deposited waste is encountered during the Construction Phase, the contractor will notify DCC and provide a Hazardous/Contaminated Soil Management Plan, to include estimated tonnages, description of location, any relevant mitigation, destination for disposal/treatment, in addition to information on the authorised waste collector(s).

4.1.4.4 Operational Phase

There will also be in increase in the form of municipal waste during the Operational Phase of the Proposed Development mainly arising from the student accommodation and communal spaces, commercial spaces and staff facilities. An Operational Waste Management Plan (OWMP) has been prepared by AWN Consulting. The OWMP details the typical non-hazardous and hazardous wastes that will be generated at the Proposed Development including:

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

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

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

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

A waste generation model (WGM) developed by AWN Consulting has been used to predict waste types, weights and volumes expected to arise from the operational phase of the Proposed Development, the results of which are detailed in Table 3-4.

Table 4-3 Estimated Waste Generation for the Proposed Development (Operational Phase) (AWN Consulting, 2023)

Waste Type	Waste Volume (m^3 / week)		
	Student Units (combined)	Cultural/ Community Space	Retail
Organic Waste	5.10	0.16	0.09
DMR	34.88	2.14	1.87
Glass	1.97	0.09	0.05
MNR	20.28	1.31	0.78
Total	**62.24**	**4.69**	**2.70**

Two (2 no.) Waste Storage Areas (WSAs) for the student accommodation have been allocated across the two blocks, both located at ground floor level. One (1 no.) WSA has been allocated for use by the Commercial Unit and Cultural / Community Space tenants in Block 2. This WSA is located at ground floor level in Block 2.

4.1.5 Pollution and Nuisance

The Construction and Demolition Phase of the Proposed Development could give rise to short-lived dust nuisances. However, it is not predicted that these impacts will be significant, as they will be intermittent, localised, and last only for the duration of the Demolition and Construction Phase. Adequate dust control measures will be put in place for the duration of the Proposed Development as per the Construction Environmental Management Plan (CEMP).

The Proposed Development will comply with BS 5228 “Noise Control on Construction and open sites Part 1: Code of Practice for basic information and procedures for noise control” and all works will be limited to normal daytime working hours. An initial site noise risk assessment has been carried out on the proposed student accommodation development at Gowan House, Carriglea Business Park, Naas Road, Dublin 12. The noise assessment has classified the site as having a medium to high noise risk across the site in accordance with ProPG guidance. This was determined through a review of baseline noise measurements, noise modelling of the site and review of published noise maps for the local road network and adjacent Luas Line in the vicinity of the development site.

The assessment has concluded that it will be necessary to provide an enhanced acoustic glazing to the northern and north-east and north-western facades of Blocks 1 and 2 to ensure that when windows are closed that the internal noise environment is acceptable.

The noise level internally with the windows open will be within the good to reasonable noise range in line with the ProPG and BS 8233 guidance within bedrooms within Block1, Core B, facing west and south and Block 2, Core D, facing east and south. Along the northern façades of Blocks 1 and 2, the use of an enhanced acoustic glazing have been specified to achieve internal noise levels with windows closed along these façades.

The Proposed Development is not considered to result in any likely significant noise and vibration effects.

The Proposed Development is not expected to give rise to nuisance odours as it will be a mixed-use student accommodation and commercial development.

Implementation of the CEMP and RWMP prepared for the Proposed Development by AWN Consulting will ensure that all applicable environmental health and safety regulation is complied with throughout the Demolition and Construction Phase thereby ensuring that the Proposed Development will not result in significant effects on human health or the environment resulting from potential pollution or nuisance.

4.1.6 Risk of Major Accidents and/or Disasters

The potential for the Construction or Operational Phase of the Proposed Development to result in any major accidents and /or disasters can be considered low. This is based on the correct adoption of all standard health and safety procedures, and the lack of substances that will be used in the Proposed Development which may cause concern for having likely significant effects on the environment. Furthermore, the Site will be secured at all times and construction works will be managed and controlled by using standard good practice measures for construction sites and adhering to normal daytime working hours.

There is potential for the daylighted culvert to become partially blocked causing flooding of the open channel. This is assessed as part of the Flood Risk Assessment and discussed in more detail in Section 3.6.3.4 of this EIA Screening Report.

It is therefore anticipated that the risk of accidents and/or disasters will be insignificant due to the nature of the Proposed Development, proper Site management, and adherence to all standard health and safety procedures.

4.1.7 Risk to Human Health

During the Demolition, Construction and Operational Phases, due to good and established management practices, good housekeeping, and adherence to regulatory health and safety procedures, it is not foreseen that there will be any negative impacts to human health.

A strategy for controlling all substances and all work processes that may generate hazardous substances will be outlined within the RWMP and appropriate control measures will be put in place should hazardous waste or contaminated soil be identified.

A series of air and dust mitigation measures are be detailed in the CEMP prepared by AWN Consulting which will protect the air quality of the Site and surrounding environment.

4.2 Location of the Project

4.2.1 Existing and Approved Land Use

Under the Dublin City Council Development Plan (DCCDP) 2022-2028, the Site is zoned as "*Z14 – Strategic Development and Regeneration Areas (SDRAs)*". The objective of Z14 is "*to seek the social, economic and physical development and/or regeneration of an area with mixed-use, of which residential would be the predominant use*".

Student accommodation is listed a permissible use for Z14 and therefore the Proposed Development can be classed an appropriate use.

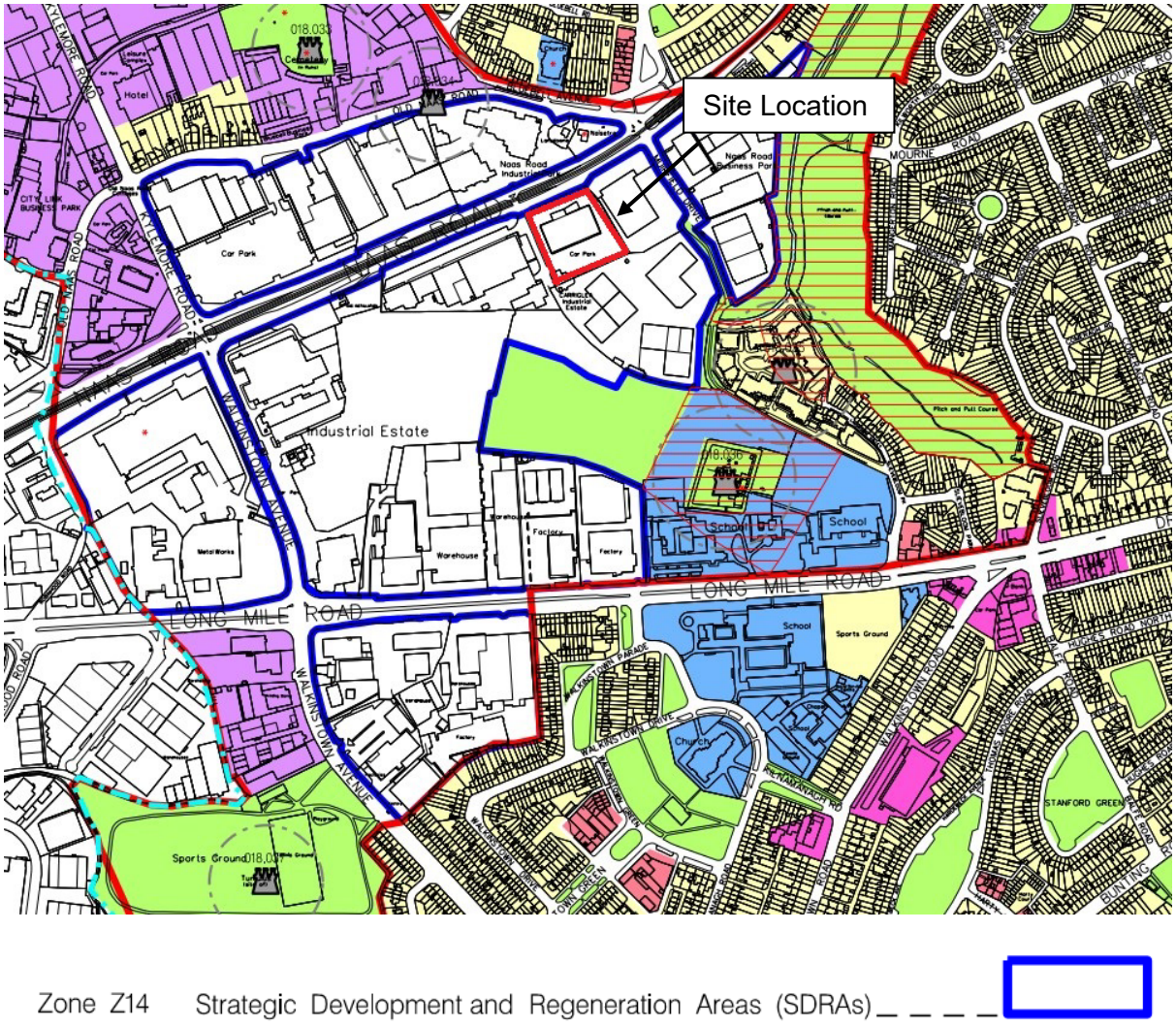

Figure 4-1: Land Use Zoning of the Proposed Development (DCC Development Plan 2022-2028 Map Set G)

4.2.2 The Absorption Capacity of the Natural Environment

4.2.2.1 Overview

The soil is classified as *Urban* and the subsoil is man-made (*Made*) (EPA, 2023).

4.2.2.2 Watercourses

The Site of the Proposed Development is within the *Liffey and Dublin Bay* catchment (Catchment ID 09) and *Mayne_SC_010* sub-catchment (Sub-Catchment ID 09_17). The River Camac is culverted beneath the Site and connects to the Walkinstown Stream (EU Code: IE_EA_09C020500) 147m southeast of the Site. The River Camac then flows for 4.1km northeast to discharge to the River Liffey (EU Code: IE_EA_090_0400) and ultimately enters Dublin Bay (EU Code: IE_EA_090_0300).

The River Camac is currently *At Risk* of not meeting its Water Framework Directive (WFD) objectives and was designated a *Poor* ecological status during the most recent 2016-2021 survey period (EPA, 2023). The status of the River Camac was designated as *Poor* (Q-Value 3) by the EPA in 2022 (station code: RS09C020500, located 1.7km northeast of the Site). The

ecological status of the Liffey Estuary Upper transitional waterbody is classified as *Good* during this most recent survey period (EPA, 2023).

The Site is situated on the *Dublin* groundwater body (EU Code: IE_EA_G_008), which is currently under review as to whether it will meet its WFD objectives. The aquifer type within the Site boundary is a *Locally Important Aquifer* (Ll) on bedrock which is *Moderately Productive only in Local Zones*. The groundwater rock units underlying the aquifer are classified as *Dinantian Upper Impure Limestones* (GSI, 2023). The level of vulnerability of the Site to groundwater contamination via human activities is *Moderate*.

4.2.2.3 Coastal Zones

The Appropriate Assessment Screening Report has assessed a number of coastal European Sites including South Dublin Bay SAC (000210), North Dublin Bay SAC (000206), South Dublin Bay and River Tolka Estuary SPA (004024) and North Bull Island SPA (004006).

4.2.2.4 Mountain and Forest Areas

There are no mountainous or forested areas directly bounding the Proposed Development. The Construction, Demolition or Operational Phase of the Proposed Development will have no impact on mountains or forested areas.

4.2.2.5 Nature Reserves and Parks

There are no nature areas or parks that will be affected by the Proposed Development.

4.2.2.6 Nationally Designated Sites

An Ecological Impact Assessment (EcIA) was prepared by Enviroguide (2023) for the Proposed Development Site to assesses the potential effects of the Proposed Development on habitats and species; particularly those protected by national and international legislation or considered to be of particular nature conservation importance on or adjacent to the Site (Table 3-5).

Table 4-4 Nationally Designated Sites

Site Name and Code	Distance	Location
Natural Heritage Areas (NHA)		
N/A		
Proposed natural Heritage Areas (pNHA)		
Grand Canal pNHA (002104)	540m	N / NE
North Dublin Bay pNHA (000206)	11.5 river km	NE
South Dublin Bay pNHA (000210)	11.5 river km	E
Dolphins, Dublin Docks pNHA (000201)	11.5 river km	E

There are 2 no. Ramsar sites located 11.5 river km from the Site; Sandymount Strand / Tolka Estuary Ramsar Site (832) and North Bull Island Ramsar Site (406) and 1 no. other international designated site 11.5 river km from the Site; Dublin Bay UNESCO Biosphere.

4.2.2.7 European Sites

In order to identify the European Sites that potentially lie within the he Zone of Influence (ZOI) of the Proposed Development a Source-Pathway-Receptor method was adopted as detailed in the Appropriate Assessment Screening Report. Within the established ZOI, 2 no. Special Areas of Conservation (SAC) and 2 no. Special Protection Area (SPA) were identified (Table 3-6).

Table 4-5: Designated and Protected Sites

Protected Site Classification	Site Name	Site Code	Distance to Site (km)
Special Protection Area (SPA)	South Dublin Bay and River Tolka Estuary SPA	004024	7.8km NE
	North Bull Island SPA	004006	10.8km NE
Special Area of Conservation (SAC)	South Dublin Bay SAC	000210	8.5km E
	North Dublin Bay SAC	000206	10.8km NE

4.2.2.8 Environmental Quality Standards

It is not expected that any environmental quality standards will be exceeded by Construction, Demolition or Operational Phases of this Proposed Development. There will be no direct discharges to groundwater or surface water during the Construction Phase of the Proposed Development.

4.2.2.9 Densely Populated Areas

The Proposed Development is located in the Electoral Division (ED) of Walkinstown A and Inchicore B and is located southwest of Dublin City. The population of these EDs has increased from the 2016 to 2022 census along with the population of County Dublin.

Table 4-6 Population of Walkinstown A ED, Inchicore B ED and County Dublin (CSO, 2023)

Area	Population 2016	Population 2022	Actual change since previous census	Percentage change since previous census
Inchicore B, Co. Dublin, 02107	2218	2274	56	+2.5
Walkinstown A, Co. Dublin, 02158	2765	2851	86	+3.1
County Dublin	1347359	1450701	103342	+7.67

In terms of public transport facilities, the Luas redline runs along the Naas Road directly in front of the development. The nearest stop is at Bluebell 150 metres from the development. The subject Site is at a prominent location on the Naas Road beside an identified public transport hub that is prime for redevelopment and the delivery of a landmark proposition (Planning Report, TOC, 2023). Given the proposed site usage will be for student accommodation, it is intended to provide very limited car parking on site (7 No. car-parking spaces; 2 No. motorcycle parking; 2 No. set down areas to the west and south; bicycle stores at ground and lower ground floor levels comprising 984 No. spaces; 218 No. visitor cycle parking spaces).

4.2.2.10 Landscapes and Sites of Historical, Cultural or Archaeological Significance

An Archaeological, Architectural and Cultural Heritage Impact Assessment has identified 32 no. sites of archaeological, and/or cultural heritage significance within the study area (500m radius of the Site). These comprise five RMPs (two of which are also designated PS sites), seven Protected Structures (PS) (two of which are listed as RMP sites and four are listed on the NIAH), ten NIAH sites (including four Protected Structures), two Conservation Area (CA), one area of archaeological potential (AAP), one townland boundary (TB), six unregistered cultural heritage sites (UCH) and six industrial heritage sites (IH). The Site as a whole is an area of archaeological potential (Rubicon Heritage, 2023).

A protected structure known as Naisetra is located on the opposite side of Naas Road, on the Old Naas Road. Drimnagh Castle, also a protected structure, is located approximately 300m from the Site to the southeast and is also included in the Sites and Monuments Record. Potential impacts to Naisetra and Drimnagh Castle have been assessed in the Architectural Heritage Impact Assessment prepared by Rob Goodbody and is summaried in Section 3.6 of this EIA Screening.

4.2.2.11 Designated Focal Points / Views

The Townscape and Visual Impact (TVIA) has described the sensitivity of the receiving environment as ‘low’ and visual interest, visual amenity and legibility are poor. The area is dominated by road infrastructure and industrial and commercial premises and is designated a Strategic Regeneration and Development Area, i.e., fundamental townscape change is encouraged by planning policy (Modelworks, 2023).

4.3 Characteristics of the Potential Impacts

4.3.1 Extent of the Impact

4.3.2 Transboundary Nature of the Impact

The effects of the development are local in nature and there are no transboundary impacts associated with the Proposed Development. The geographical extent and population likely to be affected is limited and significant environmental effects are unlikely to arise.

4.3.3 Magnitude and Complexity of the Impact

4.3.3.1 Air Quality and Climate

4.3.3.1.1 Air Quality

The Proposed Development involves construction and demolition works which may temporarily impact on air quality due to dust emissions. AWN have prepared a CEMP for the Proposed Development. The CEMP mitigation measures, detailed below, will be implemented to ensure that pollution and nuisances arising from site clearance and construction activities is prevented where possible and managed in accordance with best practice environmental protection.

- Complaint registers will be kept detailing all telephone calls and letters of complaint received in connection with construction activities, together with details of any remedial actions carried out;
- Equipment and vehicles used on site will be in good condition such that emissions from diesel engines etc. are not excessive; and
- Pre-start checks will be carried out on equipment to ensure they are operating efficiently and that emission controls installed as part of the equipment are functional.

Dust deposition levels will be monitored on a regular basis in order to assess the impact that site activities may have on the local ambient air quality. The following procedure will be implemented:

- The dust deposition rate will be measured by positioning Bergerhoff Dust Deposit Gauges at strategic locations near the boundaries of the site for a period of 30 (+/- 2) days if required. Monitoring should be conducted as required during periods when the highest levels of dust are expected to be generated i.e., during site preparation works and soil stripping activities.
- The exact locations will be determined after consideration of the requirements of Method VDI 2119 with respect to the location of the samplers relative to obstructions, height above ground and sample collection and analysis procedures.
- After each 30 (+/- 2 days) exposure period, the gauges will be removed from the sampling location, sealed and the dust deposits in each gauge will be determined gravimetrically by an accredited laboratory and expressed as a mg/m /day in accordance with the relevant standards.
- Technical monitoring reports detailing all measurement results, methodologies and assessment of results shall be subsequently prepared and maintained by the Site Manager.
- A limit value of 350 mg/m²/day will be used in comparison with recorded values.

<u>Dust Control Measures</u>

The aim is to ensure good site management by avoiding dust becoming airborne at source. This will be done through good design, planning and effective control strategies. The siting of

construction activities and the limiting of stockpiling will take note of the location of sensitive receptors and prevailing wind directions in order to minimise the potential for significant dust nuisance. In addition, good site management will include the ability to respond to adverse weather conditions by either restricting operations on-site or using effective control measures quickly before the potential for nuisance occurs.

- During working hours, technical staff will be available to monitor dust levels as appropriate; and
- At all times, the dust management procedures put in place will be strictly monitored and assessed.

The dust minimisation measures will be reviewed at regular intervals during the construction phase to ensure the effectiveness of the procedures in place and to maintain the goal of minimisation of dust generation. In the event of dust nuisance occurring outside the site boundary, site activities will be reviewed, and procedures implemented to rectify the problem. Specific dust control measures to be employed are presented below.

Excavation

Excavation works are limited to basement works and exposure to winds will be limited. During

periods of high winds and dry weather conditions can be a significant source of dust.

- During dry and windy periods, and when there is a likelihood of dust nuisance, watering shall be conducted to ensure moisture content of materials being moved is high enough to increase the stability of the soil and thus suppress dust, however any excavations are expected to be internal in nature;
- During periods of very high winds (gales), activities likely to generate significant dust emissions should be postponed until the gale has subsided.

The movement of trucks containing materials with a potential for dust generation to an off-site location will be enclosed or covered.

Stockpiling

The location and moisture content of stockpiles are important factors which determine their potential for dust emissions. The following measures will be put in place:

- Overburden material will be protected from exposure to wind by storing the material in sheltered parts of the site, where possible;
- Regular watering will take place during dry/windy periods to ensure the moisture content is high enough to increase the stability of the soil and suppress dust.

Site Traffic on Public Roads

Spillage and blow-off of debris, aggregates and fine material onto public roads will be reduced to a minimum by employing the following measures.

- Vehicles delivering material with potential for dust emissions to an off-site location shall be enclosed or covered at all times to restrict the escape of dust;
- Any hard surface site roads will be swept to remove mud and aggregate materials from their surface while any unsurfaced roads shall be restricted to essential site traffic only.

- A power washing facility or wheel cleaning facility will be installed near to the site compound for use by vehicles exiting the site when appropriate, and
- Road sweepers will be employed to clean the site access route as required.

General

The pro-active control of fugitive dust will ensure that the prevention of significant emissions, rather than an inefficient attempt to control them once they have been released, will contribute towards the satisfactory management of dust by the construction contractor.

4.3.3.1.2 Climate

There is the potential for combustion emissions from onsite machinery and traffic derived pollutants of CO^2 and N_2O to be emitted as a result of the proposed construction works. However, in this case, the effect on national greenhouse gas (GHG) emissions will be insignificant in terms of overall national contributions and Ireland's obligations under the Kyoto Protocol and therefore will have no considerable impact on climate.

A Climate Action, Energy and Sustainability Statement was prepared by Delap & Waller for the Proposed Development. As part of this report a feasibility study was carried out to determine the most feasible and effective low zero carbon and renewable energy technologies for the Proposed Development. The analysis and proposed strategy uses a centralised, low zero carbon, Air Source Heat Pumps to generate domestic hot water in conjunction with roof mounted solar photovoltaics. The Proposed Development will comply with the standards set out under the Part L regulation including Carbon Performance Coefficient, Energy Performance Coefficient and Renewable Energy Ratio providing improved energy performance and reducing the Proposed Development overall carbon emissions.

From a sustainable travel perspective, providing attractive alternatives such as dedicated cycle facilities and promoting public transport is key to reducing reliance on the private car and reducing the carbon emissions associated with travel. The Proposed Development includes 7 no. car-parking spaces and 2 no. motorcycle parking in an attempt to limit car related trips associated with the student accommodation and to incentivise residents top utilise other more sustainable travel options.

A Residential Travel Plan (RTP) has been prepared by Barret Mahony as part of the Planning Application. This sets out a target modal split for the future residents which features low usage of private cars justified by the low parking provision. There is a focus on high public transport usage due to the Proposed Development's close proximity to excellent public transport services. Cycling and walking will be the favoured transport options for a predicted 30% of residents at the Proposed Development which will be facilitated by the provision of bicycle stores at ground and lower ground floor levels. 941 no. bicycle spaces are being provided in the store, of which there are 5 cargo bicycles and 48 electric bicycle charging stations. Three further internal secure spaces are being provided for the staff of the retail and community spaces in the development. In addition to the internal spaces, there are a further 218 spaces being provided externally for visitors to the development. The remaining 70% of travel movements are predicted to be facilitated by public transport; namely the luas and bus.

Table 4-7 Final projected Modal Splits for students at the Proposed Development (BMCE, 2023)

Transport Mode	*Usage (%)
Public transport	70
Walking and cycling	30

The RTP also details existing bus infrastructure in the area surrounding the Proposed Development including Dublin Bus routes 13, 68/a and 69 which have an approximate 7-minute average wait time between buses at peak hours. The LUAS redline runs along the Naas Road in front of the site with the Bluebell stop located 150m east of the Site. The Luas provides a high frequency connection from the site to the city centre and other parts of the Irish Rail network & other bus routes. At peak hours the LUAS runs every 8 minutes each way.

Based on the implantation of the control measures that will be carried out, as outlined in the CEMP and this EIA Screening, it is therefore concluded that the Proposed Development will not result in significant adverse effect on air quality and climate.

4.3.3.2 Noise and Vibration

There will be an increase in noise and vibration levels during the Demolition and Construction Phase. However, these impacts will be localised, intermittent, and last only for the duration of this phase. It is not considered that noise levels from the Proposed Development will be significant during these works due to the urban nature of the surrounding environment and the control measures imposed. Noise and vibration levels will be controlled to ensure that the Development is operated in a way that minimises detrimental impact to the amenities of local residents.

An Inward Noise Impact Assessment was carried out by AWN Consulting to assess potential noise impacts and to advise on the acoustic design requirements to the site and façade to achieve suitable internal noise levels for residents. Baseline noise surveys were carried out to determine the baseline noise environment. The Site has a “medium to high” risk to environmental noise across the majority of the site in accordance with guidance from the UK planning document ProPG Planning and Noise (2017). The report concluded that;

> *“it will be necessary to provide an enhanced acoustic glazing to the northern and north-east and north-western facades of Blocks 1 and 2 to ensure that when windows are closed that the internal noise environment is acceptable.*
>
> *The noise level internally with the windows open will be within the good to reasonable noise range in line with the ProPG and BS 8233 guidance within bedrooms within Block 1, Core B, facing west and south and Block 2, Core D, facing east and south.*
>
> *Along the northern façades of Blocks 1 and 2, the use of an enhanced acoustic glazing have been specified to achieve internal noise levels with windows closed along these façades” (AWN Consutling, 2023)*

The CEMP contains mitigation measures to minimise noise and vibration during the construction phase. All works on site will comply with BS 5228 2009+ A1 2014 (Parts 1 & 2) which gives detailed guidance on the control of noise and vibration from construction activities.

In general, the contractor shall implement the following mitigation measures during the proposed infrastructure works:

- Avoid unnecessary revving of engines and switch off equipment when not required.
- Keep internal haul roads well maintained and avoid steep gradients.
- Minimise drop height of materials.
- Start-up plant sequentially rather than all together

More specifically the contractor will ensure that:

- In accordance with “Best Practicable Means”, plant and activities to be employed on site are reviewed to ensure that they are the quietest available for the required purpose.
- Where required, improved sound reduction methods are used e.g. enclosures.
- Site equipment is located away from noise sensitive areas, as much as physically possible.
- Regular and effective maintenance by trained personnel is carried out to reduce noise and / or vibration from plant and machinery.
- Hours are limited during which site activities likely to create high levels of noise and vibration are carried out.
- A site representative responsible for matters relating to noise and vibration will be appointed prior to construction on site.

External noise and vibration monitoring will be undertaken at locations on the site boundary closest to sensitive locations. It is considered that it will be appropriate to amend the monitoring programme as the works progress. Accordingly, monitors may be added or relocated as necessary.

The noise monitoring terminals should provide the following at minimum:

- Logging at hourly intervals; and
- Daily CIC automated calibrations.

All DCC qualifying requirements will be observed, particularly relating to the guidance note *“Air Quality Monitoring and Noise Control Unit’s Good Practice Guide for Construction and Demolition (2022)”.*

Based on the measures that will be carried out as outlined in the CEMP, it is therefore concluded that the Proposed Development will not result in significant adverse noise and vibration related effects.

4.3.3.3 Soils and Geology

The strategy for controlling and mitigating potential adverse environmental or health and safety standards in relation to waste soils and ground contamination will be to adopt the procedures and control methods set out within the RWMP and CEMP prepared by AWN Consutling.

In the event that hazardous soil, or historically deposited waste is encountered during the construction phase, the contractor will notify Dublin City Council (DCC) and provide a Hazardous/Contaminated Soil Management Plan, to include estimated tonnages, description of location, any relevant mitigation, destination for disposal/treatment, in addition to information on the authorised waste collector(s).

A detailed geotechnical and contamination site investigation has been carried out by Ground Investigations Ireland Ltd. (July 2023). The findings of this investigation include the following:

- *"No groundwater encountered.*
- *Trial pit stable.*
- *Trial pit terminated due to obstruction at 2.00m.*
- *Trial pit backfilled upon completion."*

Based on the implantation of the control measures that will be carried out, as outlined in the CEMP and this EIA Screening, it is therefore concluded that the Proposed Development will not result in significant adverse effect on soils and geology.

4.3.3.4 Hydrology and Hydrogeology

4.3.3.4.1 Surface water and foul water management

The proposed surface water drainage system is described in detail in the Civil Engineering Infrastructure and Surface Water Management Report prepared by Barrett Mahony (August 2023). SuDs measures will be used throughout the Proposed Development in accordance with guidelines and best practice. The following measures are proposed:

- Intensive Green Roof & Podium Areas with paving & soft landscaping.
- Extensive Green/blue Roofs (Sedum) to areas inaccessible to residents.
- Permeable paved areas at grade.
- Bio-retention areas/Tree-Pits

All proposed SuDS measures will be in accordance with the Dublin City Council Development Plan 2022-2028 requirements. Blue roofs will be used to minimise the size of the buried attenuation tank.

There is existing infrastructure in place on the Site for foul water which discharges into a sewer located on the No-Name Road along the eastern boundary. Subject to agreement with Irish Water, the Proposed Development will connect to the existing sewer on No-name Road.

4.3.3.4.2 Flood Risk

The Flood Risk Assessment (FRA) prepared for the Site states the Proposed Development is located in Flood Zone C where the probability of flooding from rivers and the sea is low. The FRA concluded that the site "*is at negligible risk of flooding from external sources and that the development is 'Appropriate' in accordance with the OPW Guidelines…There is no discernible potential impact of the development on flooding in the vicinity of the site or downstream of it*."

Given the comprehensive and detailed nature of the existing information available regarding flooding, Barrett Mahony Consulting Engineers (BMCE) have not considered it necessary to carry out any further analysis of the tidal or pluvial flooding of the site. However, as the Camac culvert is due to be daylighted, it is considered that a more detailed study of the flows in the open channel needs to be carried out.

There is potential for the daylighted culvert to become partially blocked causing flooding of the open channel. The potential impact on the flood levels through the open channel was also considered in the FRA where the width of the culvert was reduced by 1m using HEC RAS design software) to simulate a potential blockage. BMCE concluded "*it is considered that the*

daylighting of the Camac culvert does not create a significant fluvial flood risk to the development."

4.3.3.4.3 Hydrological and Hydrogeological Risk Assessment

A Hydrological and Hydrogeological Qualitative Risk Assessment (HHQRA) was prepared by AWN Consulting to assess the potential for any likely significant impacts on receiving waters and protected ecological areas during construction or post development. In particular, the HRA considers the likely impact on water quality and overall water body status within the South Dublin Bay. A conceptual site model (CSM) has been developed and used by AWN to allow possible Source Pathway Receptor (S-P-R) linkages to be identified. Potential sources of pollution were considered during both the Construction and Operational Phase in a worst-case scenario without taking account of any mitigation measures intended to avoid or reduce harmful effects of the Proposed Development. It is concluded that there will be imperceptible impacts from the Proposed Development to the water bodies due to emissions from the site stormwater drainage infrastructure to the wider drainage network.

The HHQRA concluded that:

> *"there are no pollutant linkages as a result of the construction or operation of the Proposed Development which could result in a water quality impact which could alter the habitat requirements of the Natura 2000 sites within South Dublin Bay."*

Adequate mitigation measures will be incorporated in the Construction Environmental Management Plan (CEMP) which will provide further protection to the receiving soil and water environments. However, the protection of downstream European sites is in no way reliant on these measures and they have not been taken into account in this assessment.

4.3.3.4.4 Hydromorphological Assessment

A Hydromorphological Qualitative Technical Assessment was carried out by AWN Consulting. This report found that:

> *"As a result of the proposed new development the hydromorphological condition would be improved from 'Poor' to 'Good' at the site."*

According to DCC's policy "*Managing Development Within and Adjacent to Camac River Corridor"* a 25-metre set-back distance from the top of the riverbank is required for large development sites in excess of 0.5ha. AWN have concluded that "*25 metres set-back distance is not necessary as the ecological functioning and water quality of the river are expected to be improved at a local scale due to the proposed daylighting of the Camac River."* The hydrological regime of the river will not be affected by the Proposed Development.

4.3.3.4.5 WFD Screening Assessment

A Water Framework Directive (WFD) Screening Assessment was also carried out by AWN Consulting for the River Camac. The Camac River surface waterbody is considered to have an ecological status of 'Poor' due to their hydromorphological / biological conditions.

The following mitigation measures have been proposed within the WFD Screening Assessment for the Construction Phase.

Daylighting of the Camac River.

During the process of daylighting the river Camac, several mitigations will be employed. To create a new central river channel, sandbags will be placed on both sides of the culvert, and protective sheeting will be installed over the top of the river channel. To facilitate the demolition phase, a temporary working platform with handrails will also be installed. These measures are intended to ensure the safe and controlled restoration of the river while minimizing potential risks and environmental impacts.

Suspended solids management.

As there is potential for run-off to directly discharge / recharge to a watercourse / groundwater (Camac River Surface Waterbody/ Dublin GWB) underlying the site and in order to manage the potential impact associated with sediment and sediment runoff the following mitigation measures will be implemented during the construction phase.

- During earthworks and excavation works, care will be taken to ensure that exposed soil surfaces are stable to minimise erosion. All exposed soil surfaces will be within the main excavation site which limits the potential for any offsite impacts.
- Run-off water containing silt will be contained on site via settlement tanks and treated to ensure adequate silt removal.
- Silt reduction measures on site will include a combination of silt fencing and settlement measures (silt traps, silt sacks and settlement tanks/ponds).
- Any hard surface site roads will be swept to remove mud and aggregate materials from their surface while any unsurfaced roads shall be restricted to essential site traffic only.
- A power washing facility or wheel cleaning facility will be installed near to the site compound for use by vehicles exiting the site when appropriate,
- A stabilised entranceway consisting of an aggregate on a filter cloth base that is located at any entry or exit point of the construction site.
- Aggregate will be established at the site entrance points from the construction site boundary extending for at least 10 m.
- The temporary storage of soil will be carefully managed. Stockpiles will be tightly compacted to reduce runoff and graded to aid in runoff collection.
- Construction materials, including aggregates etc. will be stored a minimum of 20-meter buffer distance from any surface water bodies and surface water drainage points.
- Aggregate materials such as sands and gravels will be stored in clearly marked receptacles within a secure compound area to prevent contamination.
- Movement of material will be minimised to reduce the degradation of soil structure and generation of dust.
- Excavations will remain open for as little time as possible before the placement of fill. This will help to minimise the potential for water ingress into excavations.

- Weather conditions will be considered when planning construction activities to minimise the risk of run-off from the site.
- Any surface water run-off collecting in excavations will likely contain a high sediment load. This will not be allowed to directly discharge directly to the stormwater sewer.

In addition to the measures above, all excavated materials will be visually assessed by suitably qualified persons for signs of possible contamination such as staining or strong odours. Should any unusual staining or odour be noticed, samples of this soil will be analysed for the presence of potential contaminants to ensure that historical pollution of the soil has not occurred. Should it be determined that any of the soil excavated is contaminated, this will be segregated and appropriately disposed of by a suitably permitted/licensed waste disposal contractor.

Surface water discharge from the site will be managed and controlled for the duration of the construction works until the permanently attenuated surface water drainage system of the proposed site is complete. A temporary drainage system shall be established prior to the commencement of the initial infrastructure construction works to collect and discharge any treated construction water during construction.

Cement/concrete works

Where feasible all ready-mixed concrete will be brought to site by truck. A suitable risk assessment for wet concreting will be completed prior to works being carried out which will include measures to prevent discharge of alkaline wastewaters or contaminated storm water to the underlying subsoil.

No wash-down or wash-out of ready-mix concrete vehicles during the construction works will be carried out at the site within 10 meters of an existing surface water drainage point. Washouts will only be allowed to take place in designated areas with an impervious surface where all wash water is contained and removed from site by road tanker or discharged to foul sewer submit to agreement with Irish Water / DCC.

The construction contractor will be required to implement emergency response procedures, and these will be in line with industry guidance. All personnel working on the Site will be suitably trained in the implementation of the procedures.

Hydrocarbons and other construction chemicals

The following mitigation measures will be implemented during the construction phase in order to prevent any spillages to ground of fuels and other construction chemicals and prevent any resulting to surface water and groundwater systems:

- Designation of bunded refuelling areas on the Site.
- Provision of spill kit facilities across the Site.
- Where mobile fuel bowsers are used, the following measures will be taken:
    - Any flexible pipe, tap or valve will be fitted with a lock and will be secured when not in use.
    - The pump or valve will be fitted with a lock and will be secured when not in use.
    - All bowsers to carry a spill kit and operatives must have spill response training.

- Portable generators or similar fuel containing equipment will be placed on suitable drip trays.

In the case of drummed fuel or other potentially polluting substances which may be used during the construction phase, the following measures will be adopted:

- Secure storage of all containers that contain potential polluting substances in a dedicated internally bunded chemical storage cabinet unit or inside a concrete bunded area;
- Oil and fuel storage tanks shall be stored in designated areas, and these areas shall be stored within temporary bunded areas, doubled skinned tanks or bunded containers to a volume of 110% of the capacity of the largest tank/container. Drainage from the bunded area(s) shall be diverted for collection and safe disposal.
- Clear labelling of containers so that appropriate remedial measures can be taken in the event of a spillage.
- All drums to be quality approved and manufactured to a recognised standard.
- If drums are to be moved around the Site, they will be secured and on spill pallets; and
- Drums will be loaded and unloaded by competent and trained personnel using appropriate equipment.

Refuelling of construction vehicles and the addition of hydraulic oils or lubricants to vehicles will take place in a designated area or within the construction compound (or where possible off the site) which will be away from surface water gulleys or drains minimum 20 m buffer zone). In the event of a machine requiring refuelling outside of this area, fuel will be transported in a mobile double skinned tank. An adequate supply of spill kits and hydrocarbon adsorbent packs will be stored in this area. All relevant personnel will be fully trained in the use of this equipment. Guidelines such as “Control of Water Pollution from Construction Sites, Guidance for Consultants and Contractors” (CIRIA 532, 2001) will be complied with.

The construction contractor will be required to implement emergency response procedures, and these will be in line with industry guidance. All personnel working on the Site will be suitably trained in the implementation of the procedures.

Disposal of collected water (rainfall run-off and perched water)

Rainfall at the construction site will be managed and controlled for the duration of the construction works until the permanently intercepted and attenuated surface water drainage system of the proposed site is complete. Dewatering water from excavation works within overburden deposits will be contained within the site, treated (if required) and discharged. This water will be discharged into the culverted Camac River.

A staged treatment system (treatment-train) will be in place during construction works to intercept and remove any potential contamination prior to discharge. The treatment train will ensure the quality of the discharge water is maintained and will comprise hydrocarbon interception for removal of petrol/diesel, settlement tanks for silt removal, and pH balancing.

The discharges to storm water network shall comply with the requirements of discharge to be established in the discharge licence to Dublin City Council (for storm water network).

Wastewater Management

Foul wastewater discharge from the site will be managed and controlled for the duration of the construction works.

Site welfare facilities will be established to provide sanitary facilities for construction workers on site. The main contractor will ensure that sufficient facilities are available at all times to accommodate the number of employees on site. Foul water from the offices and welfare facilities on the site will discharge into the existing sewer on site (the cabins may initially need to have the foul water collected by a licensed waste sewerage contractor before connection to the sewer line can be made).

The construction contractor will implement emergency response procedures, and these will be in line with industry guidance. All personnel working on the Site will be suitably trained in the implementation of the procedures.

Management of Surface Water Flow Paths

During construction a site drainage and protection system will be built to reduce the flow of run-off from the site, prevent soil erosion, and protect water quality in the Camac River. Temporary excavated channels, bunds, or ridges or a combination of the three, may be constructed to divert sediment-laden water to an appropriate sediment retention structure. These will be installed to provide permanent diversion of clean stormwater away from erosion exposed soil areas, or to provide a barrier between exposed areas and unexposed areas of the construction site. Runoff diversion channels/bunds need regular maintenance to keep functioning throughout their life.

Silt fences will be installed around the perimeter of the site where construction is proposed to detain flows from runoff so that deposition of transported sediment can occur through settlement. Inspection and maintenance of the silt fences during construction phase is crucial to ensuring that they work as intended. They will remain in place throughout the entire construction phase.

It is envisaged that a number of geotextile lined settling basins and temporary moundings and/or silt fences will be installed to ensure silts do not flow off site during the construction stage. This temporary surface water management facility will throttle runoff and allow suspended solids to be settled out and removed. All inlets to the settling basins will be 'riprapped' to prevent scour and erosion in the vicinity of the inlet.

Surface water discharge from the site will be managed and controlled for the duration of the construction works until the permanently attenuated surface water drainage system of the proposed site is complete. A temporary drainage system shall be established prior to the commencement of the initial infrastructure construction works to collect and discharge any treated construction water during construction (AWN Consulting, 2023).

The WFD assessment concluded that:

> *"there is no potential for adverse or minor temporary/ long-term or localised effects on the Camac River surface waterbody. Therefore, it has been assessed that the proposed development will not prevent attainment, or potential to achieve, future good*

status or to meet the requirements and/or objectives in the second RBMP 2018-2021 (River Basin Management Plan) and draft third RBMP 2022-2027."

The WFD assessment also concluded that:

"that there is no potential for adverse or minor temporary or localised effects on the Dublin groundwater body. Therefore, it has been assessed that it is unlikely that the proposed development will prevent attainment, or potential to achieve the WFD objectives or to meet the requirements and/or objectives in the second RBMP 2018-2021 (River Basin Management Plan) and draft third RBMP 2022-2027."

4.3.3.4.6 Mitigation Measures

The CEMP also details control measures relating to surface water management during the construction phase.

- Care will be taken to ensure that exposed soil surfaces are stable to minimise erosion. All exposed soil surfaces will be within the main excavation site which limits the potential for any offsite impacts. All run-off will be prevented from directly entering into any water courses.
- No significant dewatering will be required during the construction phase which would result in the localised lowering of the water table. There may be localised pumping of surface run-off from the excavations during and after heavy rainfall events to ensure that the excavation is kept relatively dry.
- Construction works are informed by best practice guidance from Inland Fisheries Ireland on the prevention of pollution during development projects:
    - Control of Water Pollution from construction Sites, Guidance for consultants and contractors (C532); and
    - Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters (2016).
    - Environmental Good Practice on Site (3rd edition) (C692).

The CEMP also details control measures relating to Pollution Control during the construction phase.

Management of Suspended solids in run-off

Any temporary storage of spoil, hardcore, crushed concrete or similar material will be stored as far as possible from any surface water drains and also stored in receptacles where possible. In order to minimise the risk of contamination, the stockpiled material will be removed off-site as soon as possible. Surface water drain gratings in areas near or close to where stockpiles are located will be covered by appropriate durable polyurethane covers or similar.

There can be no direct pumping of silty water from the works to any watercourse. All water from excavations must be treated by infiltration over lands or via settlement areas, silt busters etc.

Concrete Run-off

No wash-down or wash-out of ready-mix concrete vehicles during the construction works will be carried out at the site within 10 metres of an existing surface water drainage point. Washouts will only be allowed to take place in designated areas with an impervious surface.

Accidental Spills and Leaks

No bulk chemicals will be stored within the active construction areas. Temporary oil and fuel storage tanks will be kept in the material storage area in suitable containers and will be appropriately bunded as required. Refuelling of vehicles and the addition hydraulic oils or lubricants to vehicles will take place in designated areas of the site, where possible, which will be kept away from surface water drains.

Spill protection equipment such as absorbent mats, socks and sand will be available to be used in the event of an accidental release during refuelling. Training will be given to appropriate site workers in how to manage a spill event.

The following mitigation measures will be taken at the construction site in order to prevent any spillages to ground of fuels during machinery activities and prevent any resulting soil and/or groundwater quality impacts:

- Refuelling will be undertaken off site where possible;
- Where mobile fuel bowsers are used the following measures will be taken:
    - Any flexible pipe, tap or valve will be fitted with a lock and will be secured when not in use;
    - The pump or valve will be fitted with a lock and will be secured when not in use;
    - All bowsers must carry a spill kit;
    - Operatives must have spill response training; and
    - Portable generators or similar fuel containing equipment will be placed on suitable drip trays.

Monitoring

Weekly checks will be carried out to ensure surface water drains are not blocked by silt, or other items, and that all storage is located at least 10m from surface water receptors and existing drains. A regular log of inspections will be maintained, and any significant blockage or spill incidents will be recorded for root cause investigation purposes and updating procedures to ensure incidents do not reoccur.

4.3.3.4.7 Daylighting of the River Camac

The CEMP includes mitigation measures specifically relating to the daylighting of the river Camac. To create a new central river channel, sandbags will be placed on both sides of the culvert, and protective sheeting will be installed over the top of the river channel. To facilitate the demolition phase, a temporary working platform with handrails will also be installed. These measures are intended to ensure the safe and controlled restoration of the river while minimizing potential risks and environmental impacts.

The general procedure of works for the daylighting of the culvert are as follow:

- Excavating to uncover the current Camac culvert. To ensure the stability of the surrounding ground, a sloping gradient with a ratio of 1:2 will be implemented, commencing from a point 5 meters away from the culvert's front face.
- Retaining walls will be constructed on both sides of the culvert.
- Demolition of the existing culvert lid.
- Excavating and creating sloped ground at the land boundaries to reach the necessary formation levels. The sloped ground serves as a temporary work system to counter soil surcharge.
- Installation of contiguous piled wall along a portion of the south-eastern boundaries. The 450mm Ø contiguous piled wall is designed to cantilever in the temporary condition.

Based on the conclusion of reports referenced in Section 4.3.3.4 and the control measures proposed, it is considered that the Proposed Development will not cause any significant adverse effects on the hydrology and hydrogeology within the Site of the development, or the surrounding area.

4.3.3.5 Biodiversity

Within the zone of influence (ZOI), 2 no. Special Areas of Conservation (SAC) and 2 no. Special Protection Area (SPA) were identified. The Site is currently underlain by the existing surface water sewer that discharges to the River Camac. There is potential for the surface water run-off from the Site to enter this drainage network and the River Camac and ultimately discharge to Dublin Bay. As such, there is a potential, indirect hydrological pathway via surface water run-off to South Dublin Bay SAC (000210), North Dublin Bay SAC (000206), South Dublin Bay and River Tolka Estuary SPA (004024) and North Bull Island SPA (004006). Due to the distance between the Proposed Development and these European Sites, any potential pollutants will be diluted to indiscernible levels. Therefore, this hydrological pathway to these downstream European sites is considered insignificant.

The Site will also be connected to the existing foul water sewer network, which will be discharged to Dublin Bay from Ringsend WwTP. As such, there is also a weak hydrological link between the Site and South Dublin Bay SAC (000210), North Dublin Bay SAC (000206), South Dublin Bay and River Tolka Estuary SPA (004024) and North Bull Island SPA (004006) via discharges from Ringsend WwTP during the Operational Phase. However, the potential for foul waters generated at the Site of the Proposed Development to reach these European sites within Dublin Bay and cause significant effects, during the Construction and Operational Phases, is negligible (Enviroguide 2023).

No direct hydrogeological pathways, air or land pathways from the Proposed Development to any European sites were identified.

In conclusion, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of the AA Screening Report that the possibility **may be excluded** that the Proposed Development will have a significant effect on any of the European sites listed below:

- South Dublin Bay SAC (000210).

- North Dublin Bay SAC (000206).
- South Dublin Bay and River Tolka Estuary SPA (004024).
- North Bull Island SPA (004006).

Therefore, there is no requirement to proceed to Stage 2 of the AA process and the preparation of a NIS is not required. In carrying out this AA screening, mitigation measures have not been taken into account. Standard best practice construction measures which could have the effect of mitigating any effects on any European Sites have similarly not been taken into account.

A Biodiversity Enhancement Plan (BEP) has been prepared by Enviroguide which details enhancement measures and monitoring measures to support and improve the biodiversity at the Site during its operational lifetime (August 2023). These include:

- Native planting;
- Wildflower meadows;
- Woodland understorey
- Biodiverse roofs;
- Grassland and wildflower meadow management;
- Low intervention woodland understorey management;
- General vegetation removal;
- Controlled use of herbicides and pesticides;
- Bird box scheme;
- Swift brick scheme;
- Bat boxes;
- Insect hotels; and
- Log-piles for invertebrates and fauna.

The implementation of enhancement measures and management approach detailed within the BEP will have a positive impact on the Site's biodiversity.

An Arboricultural Report has been prepared by The Tree File Ltd. for the Site. A survey was carried out which included 44 no. trees on the Site. The Site includes 34 no. trees while a further 10 No. additional trees arise from neighbouring sites, however one of these is entangled in the existing palisade railing structure and may prove to be owned by the Applicant. The majority of the trees onsite have been previously pruned. The Tree File Ltd. describe this pruning as "*particularly harsh*" and "*Such pruning may lead to structural issues in later life and predisposition towards failure. In some instances, the extent of tree pruning has been both disfiguring and structurally harmful*". The total loss of trees will be 35 no. trees.

As no trees will be retained on the site, then on-site tree protection will not be required. However, it is noted that the neighbouring site to the east supports a number of trees, These trees will be afforded protection by the site's perimeter hoarding, which will restrict all works to the subject site only. This protection will remain in situ for the duration of the Construction Phase.

There are existing trees present along the boundary of the Site however as stated in the Landscape Design Rationale "*The existing tree planting is of low ecological value. The proposed planting promotes native species and will provide a greater ecological and aesthetical value to the Site and surrounding areas"* (Stephen Diamond Associates, 2023).

Therefore, it is considered there will be no significant, adverse effects to any valued habitats or individual or group of species as a result of the Proposed Development.

4.3.3.6 Archaeology, Architecture and Cultural Heritage

The Proposed Development and associated public realm works will require excavation works and as such may encounter surviving in-situ archaeological remains. Prior to mitigation measures being implemented the impact of the Proposed Development ranges from slight to significant as a result of construction groundworks. A significant impact is predicted for CH032, the area of archaeological potential.

The following mitigation measures are proposed.

1. The site shall be subject to a programme of pre-construction archaeological test trenching, under licence, by a suitably qualified archaeologist in order to identify the nature, extent and location of any sub-surface archaeological material. Note: where possible enabling or other groundworks works should be deferred until after the archaeological test trenching programme has been completed. Any enabling or demolition works that must be carried out prior to completion of the testing programme shall be the subject of a programme of licensed archaeological monitoring by a suitably qualified archaeologist.
2. A report on the results of the test trenching programme shall be submitted to Dublin City Council, the Heritage and Planning Division, Department of Housing, Local Government and Heritage (DHLGH) and the National Museum of Ireland prior to the commencement of the main construction programme. This report will include: a. an updated impact statement of the Proposed Development on any surviving archaeological material and describe any appropriate further mitigation measures required in the event that the trenching programme confirms the presence of archaeological features or deposits.
3. Any such further mitigation measures required must be agreed in advance with the City Archaeologist (Dublin City Council) and the National Monuments Service (DHLGH).

The residual impacts following the implementation of the above mitigation measures will reduce the impact of the Proposed Development ranging from negligible to slight.

An Architectural Heritage Impact Assessment has been prepared by Historic Building Consultants / Rob Goodbody (2023) for the Proposed Development. This report assessed the potential for the Proposed Development to impact a Naisetra, a two-storey Edwardian house which is a protected structure, and which is located on the opposite side of Naas Road, on the Old Naas Road. The report also assessed Drimnagh Castle which is located approximately 300 metres to the south-east of the application site and is a protected structure and an archaeological monument. Lansdowne House, which lies adjacent to Naisetra, to the west, is not a protected structure. Gowan House itself is not a protected structure and neither Gowan House nor Naisetra are within an architectural conservation area or any other type of conservation area. Gowan House is not of architectural heritage significance and its demolition is not at issue from a conservation perspective.

The Architectural Heritage Impact Assessment concluded that:

"the distance between the protected structure at Naisetra and the proposed buildings, together with the dense belt of evergreen trees and shrubs between the house and the proposed development, ensure that the character and setting of the protected structure will not be affected by the proposed development. Similarly, the orientation of the buildings at Drimnagh Castle, the distance of the castle from the application site and the belt of trees surrounding the castle moat ensure that there is no appreciable impact on the character and setting of Drimnagh Castle arising from the proposed development." (Historic Building Consultants, 2023)

Based on the implementation of the proposed mitigation measures and conclusion of the Archaeological, Architectural and Cultural Heritage Impact Assessment above there will be no significant, adverse effect on Archaeology, Architecture and Cultural Heritage as a result of the Proposed Development.

4.3.3.7 Material Assets and Land

All construction waste will be treated by using appropriately authorised waste disposal or materials recovery facilities. All waste will be consigned using an appropriately authorised waste collection contractor. During the Operational Phase of the Proposed Development, all waste will be collected by appropriately authorised waste collection contractors and will be treated at suitably authorised waste disposal or materials recovery facilities.

It is considered that the Proposed Development will be in keeping with the surrounding land uses and the zoning of the area, and the material assets will not be affected in any way by the Construction or Operational Phases.

Therefore, it is considered that there is sufficient capacity to service the Proposed Development in this aspect, and there will be no significant adverse impact on the material assets and land.

4.3.3.8 Landscape and Visual Amenity

A Townscape and Visual Impact Assessment (TVIA) has been prepared by Model Works which describes the baseline townscape and visual environment and assess the impact of the Proposed Development on both. To assess the visual effects, 13 no. viewpoints were selected to represent the key receptors in the receiving environment. The significance of the visual effects range from slight to moderate and neutral to positive with 1 no. viewpoint having no effect. There will therefore be no significant, negative visual impact as a result of the Proposed Development.

The townscape effects have been assessed based on the sensitivity and magnitude of townscape change. The sensitivity of the receiving environment can be classified 'low' and the magnitude of townscape change which would result from the Proposed Development is classified 'medium'. Taking this into account, the significance of townscape effects is predicted to be 'moderate positive' (Model Works, 2023). There will therefore be no significant, negative townscape impact as a result of the Proposed Development.

4.3.3.9 Population and Human Health

There is potential for construction and minimal operational traffic to impact the surrounding population and human health by causing congestion on the local road network.

A Traffic Assessment (TA) report has been prepared which estimates the volume of traffic generated by the Proposed Development at peak times and to demonstrate the imperceptible impact these flows will have nearby major junctions (BMCE, 2023). Trip volumes generated by the Proposed Development were calculated using the TRICS system to estimate peak hour trip rates for student accommodation units within development site. BMCE have concluded that the figures calculated are consistent with the limited provision of 7 No. on-site car parking spaces. Two major junctions close to the Proposed Development were also analysed: Muirfield Drive / Naas Road junction and the Naas Road / Walkinstown Avenue. The traffic generated from the Proposed Development is under the 5% threshold stipulated in the TTA Guidelines (2014) whereby a traffic assessment is required. The traffic generated from the Proposed Development is maximum 0.80% during the PM peak. This will have an "*imperceptible impact on both major junctions"* (BMCE, 2023).

A Public Transport Capacity Assessment was carried out by Derry O'Leary Public Transport Consultant (August 2023). This report outlined the assessment of the existing public transport network near the site, the existing spare capacity on the key bus routes and nearby LUAS tram service. The analysis, when combined with the very strong attractions of the nearby LUAS Red Line services from the Bluebell Stop together with the planned BusConnects routings, lead to the following key conclusions. The surveys and analysis of both tram and bus services showed very high levels of spare capacity in the morning peak period. Whilst the new demand arising from the proposed development is not insignificant, especially for the bus network, it can be catered for due to the planned increased frequencies of the revised BusConnects network of bus services.

A Community and Social Infrastructure Audit (CSA) was prepared by Thornton O'Connor Town Planning (TOC) to identify existing provision of social and community facilities within the categories of: Education and Training; Health; Sport and Recreation; Social and Community; Faith; Arts and Culture and Convenience Retailing. The study area for the CSA was defined by approximately a 750m radius of the Site. This is equivalent to approximately a 10-minute walking distance which is considered accessible to future residents of the Proposed Development. An additional 1.5km catchment has been included in the CSA study area due to the suburban, but semi-industrial, context of the Site. The Site has excellent public transport links towards Dublin City Centre, providing access to an extensive range of community, recreational and cultural activities. The area is well served by large scale sports and amenity facilities including playing pitches, multi-sport facilities and an athletic track. Additional health centres have been granted planning permission in the immediate local area which, along with existing facilities, should be sufficient to cater for the demands of the local area into the future. The Proposed Development will not generate additional demands for either primary or secondary school places, and it is judged will not create any strain on existing schooling infrastructures. Similarly, The Proposed Development will not generate additional demands for childcare places, and it is judged that the existing and proposed future provision will be sufficient to cater for local demand into the future.

The CSA found there is a lack of dedicated arts and cultural facilities within the study area and its immediate vicinity however it is noted that community centres provide for an extensive range of activities, as well as a community space for gatherings and local shows. The Proposed Development will include c.1,533 sq m of internal and external cultural / community space (571 sq m at ground floor level, and further 982 sq m at basement/lower ground). This

space will aim to increase participation and voluntary activity within the resident student population and the local community (TOC, 2023).

A Cultural and Community Infrastructure Assessment has been prepared by Turley Strategic Communications which assessed the provision of cultural / community space in the Proposed Development, the existing cultural and community infrastructure surrounding the Site and an evaluation of the current demand for cultural space, relative to the community provision (cultural space references workspace, performance space, rehearsal space, maker or multi-purpose space). In conclusion, there was "*a significant lack of appropriate cultural infrastructure near the site*" however the Proposed Development includes "*significant volume across two floors sufficient in scale to host multiple cultural and community typologies, as well as accommodate a wide range of artforms and community uses*". Turley Strategic Communications have concluded that the digital hub and co-working space included in the Proposed Development could provide opportunity for a range of activities such as podcasts and music recording, video production studios space, gallery space, kitchen, photography studios, makerspace and general co-working space. This will provide an "*enhanced contribution to the wider use of the building as purpose-built student accommodation*". The Proposed Development has potential to have a positive impact on future residents but also local residents by providing cultural community space.

Due to the nature of the proposed student accommodation, there will be a large number of students moving into the student accommodation at similar times which may cause a disturbance in the surrounding area on a limited number of moving in and out days. An Outline Delivery and Servicing Management Plan has been prepared by AWN Consutling which assesses the quantity, frequency and nature of servicing and deliveries to each area of the Proposed Development. It also provides a schedule as to how these deliveries will be managed to minimise any disruption to neighbouring developments, foot traffic around the development and impact on the local road network (AWN Consutling, 2023). A Student Management Plan has also been prepared by the Applicant to ensure the Proposed Development is managed effectively providing as much benefit to the future student tenants and limited disruption to neighbours and surrounding businesses. The implementation of the Outline Delivery and Servicing Management Plan and Student Management Plan will ensure there are no significant, long-term impacts on the surrounding community as a result of the Proposed Development.

A building of this scale has the potential to negatively impact the surrounding buildings and inhabitants if sunlight is blocked or overshadowing occurs. A Daylight and Sunlight Assessment Overview has been prepared by 3D Design Bureau for the Proposed Development. This assessment has quantified the effect the proposed development would have on the level of daylight and sunlight received by neighbouring properties/environment that are in close proximity to the proposed development. The impact assessment has mainly focused on the surrounding under construction scheme of Carriglea (ABP: 311606) and the granted development of Concord (ABP:312218). It also includes the existing houses of Landsdowne House and Naisetra House.

The effect to Vertical Sky Component (VSC) on neighbouring properties was assessed and "*while there are 'minor adverse' and some 'moderate adverse' levels of impact to the surrounding under construction and granted buildings, they are to be expected and in most part, the localised factors of the design of these buildings contribute to this.*"

The effect to Annual Probable Sunlight Hours (APSH) and Winter Probable Sunlight Hours (WPSH) on neighbouring properties was assessed and all effects were found to be negligible. No major adverse effects were found to neighbouring properties.

> *"Of the 4-no. communal private amenity spaces assessed, 3 no. have met the guidelines. Whilst one of the areas is failing to do so, the average of the 4 no areas does meet the BRE Guidelines. All future student occupants will have access to 4 no private spaces allowing them to choose areas of direct sunlight or shade depending on their desire."*

Therefore, there will be no significant impact on population and human health in terms of daylight and sunlight as a result of the Proposed Development.

The daylighted river Camac will only be accessible for maintenance purposes and residents or visitors will not have access to the river embankment. Elevated walkways will allow movement through the riparian zone and these walkways will be secured with fencing.

4.3.3.10 Resource and Waste Management

Construction and demolition waste will be managed in accordance with the RWMP prepared by AWN Consulting. All construction and demolition waste will be disposed of using suitably authorised waste disposal or materials recovery facilities. Due to the use of authorised waste collection/waste management facilities, it is not predicted that the production of waste will cause any likely significant effects on the environment.

Using the estimated waste generation volumes calculated in the OWMP, the waste receptacle requirements have been calculated. The WSAs have been appropriately sized to accommodate the weekly waste requirements for waste receptacles. It is envisaged that all waste types will be collected on a weekly basis. Students and commercial tenants will be required to take their segregated waste materials to their designated WSA and deposit their segregated waste into the appropriate waste receptacle. Implementation of the OWMP will ensure a high level of recycling, reuse and recovery at the development. All recyclable materials will be segregated at source to reduce waste contractor costs and ensure maximum diversion of materials from landfill, thus contributing to the targets set out in the EMR Waste Management Plan 2015 – 2021. Adherence to the OWMP will also ensure that waste management at the development is carried out in accordance with the requirements of the DCC Waste Byelaws (AWN Consulting, 2023).

The CEMP prepared by AWN Consulting also details the measures that will be undertaken to minimise the quantity of waste produced at the site and the measures to handle the waste in such a manner as to minimise the effects on the environment.

Waste minimisation measures proposed are summarised as follows (and are described in more detail in the RWMP):

- Materials will be ordered on an 'as needed' basis to prevent over supply;
- Materials will be correctly stored and handled to minimise the generation of damaged materials;
- Materials will be ordered in appropriate sequence to minimise materials stored on site;

- A waste tracking log will be established;
- Sub-contractors will be responsible for similarly managing their wastes; and
- All wood waste generated by site works will be inspected and examined and will be segregated as re-useable wood and scrap wood waste.

It is therefore concluded that the Proposed Development will not result in significant adverse resource or waste management related impacts.

4.3.3.11 Interactions

When considering interactions, the assessor has been vigilant in assessing pathways – direct and indirect – that can magnify effects through the interaction. In practice many impacts have slight or subtle interactions with other disciplines. However, it is concluded that most inter-relationships are neutral in impact when appropriate control measures are incorporated into the operation of the Proposed Development.

4.3.3.12 Probability of the Impact

No significant environmental impacts are predicted for the project during construction or operations, provided that the proposed mitigation measures as outlined in this EIA Screening Report.

4.3.3.13 Duration, Frequency, and Reversibility of the Impact

Negative impacts such as noise or dust during the Construction Phase will be temporary and reversible through the correct implementation of the appropriate control measures. Permanent, positive impacts will be experienced as a result of the Proposed Development in terms of human health through the generation of employment opportunities during the Construction Phase, as well as through the provision of accommodation in proximity to high frequency public transport, employment locations and services and facilities and will contribute positively towards addressing the critical national shortage in housing supply.

4.4 Cumulation with Other Projects

Plans and projects in the surrounding area that could have the potential to result in cumulative impacts in were reviewed from data sources including.

- An Bord Pleanála website, http://www.pleanala.ie/.
- EIA Portal, as provided by the Department of Housing, Planning and Local Government https://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=d7d5a3d48f104ecbb206e7e5f84b71f1
- MyPlan.ie, as provided by the Department of Housing, Local Government and Heritage in conjunction with Irish Local Authorities. https://myplan.ie/

Planning applications listed as granted or decision pending from within the last 5 years were assessed for their potential to act in-combination with the Proposed Development and cause likely significant effects.

Table 4-8 List of Off-Site Projects

Application Reg. Ref.	Address	Development Proposal	Decision
312218 Silvermount Limited	Lands at Concorde Industrial Estate, Naas Road, Walkinstown, Dublin 12	Demolition of the existing structures on site, construction of 545 no. Build to Rent apartments, creche and associated site works.	Grant Permission 21 Apr 2022
ABP Reg. Ref. 311606 Golden Port Estates Limited	Carriglea Industrial Estate, Muirfield Drive, Naas Road, Dublin 12	Strategic Housing Development. 249 no. apartments and associated site works comprising five to ten-storey buildings including a maximum building height of 26m.	Grant Permission 03 Feb 2022
3228/20 O'Flynn Construction Co. Unlimited Company	Site to the east of Walkinstown Avenue at the junction of Walkinstown Avenue and Naas Road	O'Flynn Construction Co. Unlimited Company intend to apply for a 10-year permission for a mixed-use including part Build to Rent development in 13 no. blocks (Blocks A-L) ranging in height from 4-15 storeys over 3 no. basements with a cumulative gross floor area of 168,184.13 sq.m at this 6.921 hectare site to the east of Walkinstown Avenue at the junction of Walkinstown Avenue and Naas Road. The application area includes part of the 'Nissan Site' (6.429 hectares) and 0.492 hectares to accommodate works to facilitate connections to municipal services and works proposed to public roads. Amended by planning Reference No. 3060/23	Grant Permission 06 Apr 2021
ABP Reg. Ref. 307804 (DCC Ref. 4238/19) Shorevale Investments Limited	Royal Liver Assurance Retail Park, Old Naas Road, Dublin 12	Permission (for a period of 10 years) The development will comprise the demolition of single storey warehouse buildings sub-divided to comprise 8 retail / retail warehouse units, to provide a mixed-use development and all ancillary works: comprising 9 buildings ranging in height from 7 to 18 storeys. The residential component comprises 1,102 units consisting of Build-to-Rent Residential Development	Grant Permission 19 Nov 2020
304383 (ABP-304383-19) Development Ocht Limited	Lands at the Former Concorde Industrial Estate, Naas Road, Walkinstown, Dublin 12	492 no. Build to Rent units with commercial uses and associated site works.	Grant Permission 15 Aug 2019
4244/15 Crekav Landbank Investments Limited	Carriglea Industrial Estate, Muirfield Drive, Naas Road, Dublin 12	The demolition of existing structures on site to provide for development (total GFA c. 37,255 sq m) comprising 340 No. residential units and crèche facility (c. 258 sq m) all in a development proposal of 8 No. blocks ranging in height from 4 - 5 storeys with associated	Grant Permission 17 Oct 2016

Application Reg. Ref.	Address	Development Proposal	Decision
		basement level. The overall development shall also provide for 348 No. car parking spaces, plant room areas; water stores; bin stores; of public open space; of balcony/ terrace space; of communal open space; vehicular access and egress to the site via Muirfield Drive; and all associated site development, services, and landscape works. Amended under Reg. Refs. 2438/17, 2875/17, 3940/17, 2319/18.	

It is considered that cumulative impacts are most likely to arise due to potential pollution and nuisance during the Construction Phase. Good construction management practices, as outlined within this EIA Screening, CEMP and RWMP, will minimise the risk of pollution and nuisances from construction activities at the Site. The appointed contractor will be responsible for the full implementation of management and mitigation measures.

In conclusion, subject to the implementation of the mitigation measures in terms of air quality, noise, soils, hydrology, biodiversity, archaeology, material assets, landscape and visual amenity, population and human health and waste management, which are outlined within this EIA Screening, and the proposed mitigation measures relating to off-site projects, it is not expected that cumulative impacts from these developments are likely to result in significant adverse effects on the environment.

4.5 Cumulation with Relevant Policies and Plans

The following policies and plans were reviewed and considered for possible in-combination effects with the Proposed Development.

- Dublin City Council Development Plan 2022-2028
- Eastern Midlands Regional Waste Management Plan 2015 – 2021

There is potential for proposed plans and projects within the Dublin City Council Development Plan 2022-2028 land area to have cumulative, negative impacts on conditions in Dublin Bay via rivers, other surface water features, and foul waters treated at wastewater treatment facilities. However, the core strategy, policies and objectives of the Dublin City Council Development Plan 2022-2028 have been developed to anticipate and avoid the need for developments that would be likely to significantly affect the integrity of any European site. Furthermore, such developments are required to conform to the relevant regulatory provisions for the prevention of pollution, nuisance or other environmental effects likely to significantly affect the integrity of Natura 2000 sites. The AA Screening report prepared for the Proposed Development has also concluded there will be no significant impact on any Natura 2000 sites.

The Eastern-Midlands Region Waste Management Plan 2015 – 2021 is the framework for the prevention and management of wastes in a safe and sustainable manner. The implementation of the Eastern-Midlands Region waste plan ensures that European and national mandatory targets are achieved and, in doing so, that the health of communities in the region, its people

and the environment are not compromised. A Construction and Demolition Waste Management Plan (CDWMP) has been prepared for the Proposed Development. The CDWMP has been prepared to comply with the Eastern-Midlands Region Waste Management Plan 2015 – 2021. Based on this compliance and the successful implementation of the control and mitigation measures relating to waste outlined which have been outlined within this report and the CDWMP, there will be no negative cumulative impacts between the Proposed Development and the Eastern-Midlands Region Waste Management Plan 2015 – 2021.

On examination of the above, it is considered that there are no means for the Proposed Development to act in-combination with any plans that will cause any likely significant adverse effects on the surrounding environment.

5 EU Legislation Consideration In Accordance With Article 103(1a)A

EU Legislation	Nature of the assessment completed	Conclusion of the assessment	How taken into account
Directive 92/43/EEC, The Habitats Directive	• Appropriate Assessment Screening Report	No significant impact	Refer to Section 3.4-3.6 of this Report
Directive 2000/60/EC, EU Water Framework Directive	• Civil Structural and Surface Water Management Report • Water Framework Directive (WFD) Screening Assessment • Flood Risk Assessment Report • Appropriate Assessment Screening Report • CEMP • Hydrological & Hydrogeological Qualitative Risk Assessment • Hydromorphological Qualitative Technical Assessment	No significant impact	Refer to Section 3.4-3.6 of this Report
Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (SEA Directive)	• Dublin City Council Development Plan 2022-2028 • Planning Report	No significant impact	Refer to Section 3.4-3.6 of this Report
Directive 2002/49/EC on the assessment and management of environmental noise	• Inward Noise Impact Assessment • CEMP	No significant impact	Refer to Section 3.4-3.6 of this Report
Directive 2008/50/EC on ambient air quality and cleaner air for Europe	• CEMP	No significant impact	Refer to Section 3.4-3.6 of this Report
Directive 2007/60/EC on the assessment and management of flood risks	• Flood Risk Assessment	No significant impact	Refer to Section 3.4-3.6 of this Report
Other relevant provision of EU law			
Birds Directive (79/409/EEC), Bern and Bonn Convention & Ramsar Convention.	• Ecological Impact Assessment Report	No significant impact	Refer to Section 3.4-3.6 of this Report

EU Legislation	Nature of the assessment completed	Conclusion of the assessment	How taken into account
Directive 2006/21/EC on the management of waste from extractive industries	• Not relevant to the Proposed Development.	Not relevant to the Proposed Development.	N/A
Directive (EU) 2018/850 on the landfill of waste	• RWMP • OWMP	No significant impact	Refer to Section 3.4-3.6 of this Report
Directive 2008/98/EC on waste and repealing certain Directives as amended by Directive 2018/851/EU	• RWMP • OWMP	No significant impact	Refer to Section 3.4-3.6 of this Report
Directive 2010/75/EU on industrial emissions	• Not relevant to the Proposed Development.	Not relevant to the Proposed Development.	N/A
Regulation (EC) No 166/2006 concerning the establishment of a European Pollutant Release and Transfer Register	• Not relevant to the Proposed Development.	Not relevant to the Proposed Development.	N/A
Directive 2000/14/EC on the approximation of the laws of the Member States relating to the noise emission in the environment by equipment for use outdoors	• CEMP	No significant impact	Refer to Section 3.4-3.6 of this Report
Directive 2012/27/EU on energy efficiency	• Climate Action, Energy & Sustainability Statement	No significant impact	Refer to Section 3.4-3.6 of this Report
Directive 2003/87/EC establishing a system for greenhouse gas emission allowance trading within the EU	• Not relevant to the Proposed Development	Not relevant to the Proposed Development.	N/A
Regulation (EU) 2018/842 on binding annual greenhouse gas emission reductions by Member States from 2021 to 2030 contributing to climate action to meet commitments under the Paris Agreement and amending Regulation (EU) No 525/2013	• Climate Action, Energy & Sustainability Statement	No significant impact	Refer to Section 3.4-3.6 of this Report

EU Legislation	Nature of the assessment completed	Conclusion of the assessment	How taken into account
Regulation (EU) 2018/841 on the inclusion of greenhouse gas emissions and removals from land use, land use change and forestry in the 2030 climate and energy framework, and amending Regulation (EU) No 525/2013 and Decision No 529/2013/EU	• Not relevant to the Proposed Development	Not relevant to the Proposed Development.	N/A
Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources	• Climate Action, Energy & Sustainability Statement	No significant impact	Refer to Section 3.4-3.6 of this Report
Regulation (EU) No 517/2014 on fluorinated greenhouse gases	• Climate Action, Energy & Sustainability Statement	Not relevant to the Proposed Development.	N/A
Directive 2012/18/EU on the control of major-accident hazards involving dangerous substances, amending and subsequently repealing Council Directive 96/82/EC	• Not relevant to the Proposed Development	Not relevant to the Proposed Development.	N/A

6 CONCLUSION

The Proposed Development has been assessed in accordance with the screening criteria set out in Annex III of the European Union 'EIA Directive' and in accordance with the national legislation transposing same, including the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended). It has also been assessed based on Schedule 7 to the Planning and Development Regulations, 2001 as amended. Within Schedule 7A, information to be provided by the applicant or developer for the purposes of screening sub-threshold development for EIA is set out. The Proposed Development has been assessed in accordance with this information.

Based on the assessment carried out in the appropriate sections of this Screening Report, it can be concluded that the Proposed Development will not have significant effects on the environment during both the Construction and Operational Phases.

Having regards to the nature and scale of the Proposed Development on an urban site served by public infrastructure and the absence of any significant environmental sensitivities in the area it is concluded that, by reason of the nature, scale and location of the subject site, the Proposed Development will not be likely to have significant effects on the environment. Therefore, a mandatory Environmental Impact Assessment Report (EIAR) is not required for the Proposed Development.

Table 6-1 Summary of EIA Activities

Class of Activity	Description of Activity Class	Summary Comments	EIA Required?
10 (b) (i)	*Construction of more than 500 dwelling units.*	The Proposed Development totals 941 No. Student Accommodation bedspaces (871 No. standards rooms, 47 No. accessible studio rooms and 23 No. studios). The 871 No. standard rooms are provided in 123 clusters (dwelling units). It is therefore considered to fall under the 500 dwelling unit threshold.	No
10 (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.*	The Site is c.0.9 hectares in area which is below the applicable threshold of 10 hectares.	No
12 (c)	*Holiday villages which would consist of more than 100 holiday homes outside built-up areas; hotel complexes outside built-up areas which would have an area of 20 hectares or more or an*	The Proposed Development will be utilised for short-term lets during student holiday periods and does not fall under	No

Class of Activity	Description of Activity Class	Summary Comments	EIA Required?
	accommodation capacity exceeding 300 bedrooms	the category of holiday village or hotel.	
14	*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.*	The Proposed Development involves the demolition of an existing building on the Site and will be reviewed having regard to the criteria set out in Schedule 5, Part 2 (14).	No
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.*	The Proposed Development will be reviewed having regard to the criteria set out in Schedule 5, Part 2 (15).	No

7 REFERENCES

Central Statistics Office (CSO) 2016 Census Results.

Central Statistics Office (CSO) 2022 Census Results.

Dublin City Council Development Plan (DCCDP) 2022-2028

Dept. of Housing, Planning and Local Government (DHPLG), 2018. Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment August 2018.

Environmental Protection Agency, May 2022. Guidelines on the information to be contained in Environmental Impact Assessment Reports (EPA, 2022).

European Commission 2017. Environmental Impact Assessment of Projects Guidance on Screening (Directive 2011/92/EU as amended by 2014/52/EU).

Environmental Protection Agency, (2023). Environmental Protection Agency online mapping [ONLINE] Available at: http:// https://gis.epa.ie/EPAMaps/.

Institute of Air Quality Management (2014) Guidance on the assessment of dust from demolition and construction.

S.I. No. 600/2001 - Planning and Development Regulations, 2001.

S.I. No. 296/2018 - European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018, Part 2, No. 67. Amendment of article 103 of Regulations of 2001

Unofficial Consolidation of the Planning and Development Regulations (2001-2023).

Office of Public Works, November 2009. The Planning System and Flood Risk Management, Guidelines for Planning Authorities.

Enviroguide
a DNV company

enviroguide.ie

Head Office
3D, Core C, Block 71, The Plaza, Park West, Dublin 12, D12F9TN, Ireland.
Tel: +353 1 565 4730
Email: info@enviroguide.ie

South West Regional Office
19 Henry Street, Kenmare, County Kerry, V93 CVH0, Ireland.
Tel: +353 646 641932
Email: info@enviroguide.ie

South East Regional Office
M10 Wexford Enterprise Centre, Strandfield Business Park, Rosslare Rd, Strandfield, Kerlogue, Co. Wexford, Y35 W5RD, Ireland.
Tel: +353 1 565 4730
Email: info@enviroguide.ie

Environmental Consultancy Services