

Planning
Application
to Dublin City
Council

Environmental
Impact
Assessment
Screening
Report

Proposed Large-scale
Residential
Development

At No. 42A Parkgate
Street, Dublin 8.

For Ruirside
Developments Ltd

DECEMBER 2024

Document Control: -

Author	Checked by	Purpose	Date
RC	<i>Niamh Robinson</i>	Final Draft	22.11.2024
<i>Niamh Robinson</i>	EMP	Final Draft	05.12.2024
<i>Niamh Robinson</i>	-	Final	06.12.2024

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1 INTRODUCTION

We, Stephen Little & Associates, Chartered Town Planners & Development Consultants, 26 / 27 Upper Pembroke Street, Dublin 2 D02 X361, are instructed by our Client, Ruirside Developments Ltd (the Applicant), to prepare this Environmental Impact Assessment (EIA) Screening Report to accompany the planning application for a large-scale residential development and associated site works, at No. 42A Parkgate Street, Dublin 8 (Protected Structures on site).

Ruirside Developments Limited is seeking planning permission with a life of 8 years for Large-Scale Residential Development, at a site (c. 0.82 ha), at No. 42A Parkgate Street, Dublin 8. This is a brownfield site of former Parkgate Printing Works, now known as Parkgate House, with Protected Structures on site including (a) riverside stone wall; (b) turret; (c) square tower; and (d) stone arch.

The proposed development comprises mixed use residential, community and commercial redevelopment (c. 25,777 sq m gross floor area), accommodated in 2no. blocks (Block B1 and Block C) ranging in height from 8 to 13 storeys with basement and undercroft, and including: 316no. apartments (178no. 1-bed units and 138no. 2-bed units), with associated private balconies on all building elevations and communal roof terraces at Levels 07, 08, 09 and 12; ancillary internal residents' amenity facilities (c.226 sq m); multi-functional space accommodating co-working/cultural/community/exhibition uses available for public hire (c.496 sq m); ground level retail (c.147 sq m); and all associated and ancillary demolition, conservation, landscaping and site development works.

The proposed development adjoins consented development within the same application site boundary, including LRD6042/23 (Block B2 – 40no. apartments, café/restaurant unit (236 sq m) and community/cultural space (c. 52 sq m)) and SHD-310567-21 (Block A – 198no. apartments and restaurant/café (c.187 sq m)).

We are satisfied that the steps that have been taken in the application process to date, which address the significant number of objectives in the Dublin City Development Plan 2022-2028, which in turn went through an exhaustive Strategic Environmental Assessment and Appropriate Assessment process, result in a proposed development that will not result in likely significant effects on the environment.

Having carried out this EIA screening assessment, it is our professional planning opinion that, the proposed development: -

- Is subthreshold the relevant mandatory thresholds identified for Class 10(b) projects

Therefore, it is our professional opinion that there is no requirement for an Environmental Impact Assessment Report (EIAR) in this case.

The purpose of this EIA screening report is to provide the necessary information that supports our opinion and to enable the Dublin City Council, the competent authority, to reach its own determination on whether or not the planning application for the proposed development should be accompanied by an EIAR.

2 QUALIFICATIONS AND COMPETENCE OF THE AUTHORS OF THIS REPORT

Stephen Little & Associates Chartered Town Planners and Development Consultants was established in 2003 by Stephen Little, Managing Director.

Stephen Little & Associates has extensive experience of providing planning consultancy advice on a range of civic, commercial and residential developments. This includes the preparation and co-ordination of planning applications and Environmental Impact Assessment Reports for significant development projects, in accordance with the Planning & Development (Amendment) Act 2000 (as amended), associated Planning Regulations and relevant Ministerial Guidelines for Planning Authorities.

This document has been prepared by Eleanor Mac Partlin and Niamh Robinson from Stephen Little & Associates.

Eleanor Mac Partlin, B Soc Sc, MRUP, University College Dublin, is the Associate Director of Stephen Little & Associates, with ultimate responsibility for the planning inputs for this project. Eleanor has over

25 year's experience in the management and delivery of complex multidisciplinary projects, with particular experience in Town Planning and EIA.

Niamh Robinson, BA, MA, University College Dublin, is an Executive Planner at Stephen Little & Associates. Niamh has over 4 years post-graduate professional experience of town planning and EIA in Ireland.

3 LEGISLATION & GUIDANCE

Directive 2014/52/EU has been transposed into Irish Legislation by the Planning & Development Act 2000, as amended, and the Planning and Development Regulations 2001, as amended. The methodology employed in this screening exercise is in accordance with the EIA Guidelines published in May 2022 by the DoHPLG and addresses the contents of both Schedule 7 and 7A of the Planning and Development Regulations 2001, as amended.

The EIA Screening exercise has been carried out in accordance with the following guidance documents:

- Guidelines on the information to be contained in Environmental Impact Assessment Reports (EPA 2022).
- Office of the Planning Regulator Practice Note PN02: Environmental Impact Assessment Screening (June 2021).
- Environmental Impact Assessment – Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018; DoECLG).
- Environmental Impact Assessment of Projects – Guidance on Screening (EU Commission, 2017).
- Transposition of 2014 EIA Directive (2014/52/EU) in the Land Use Planning and EPA Licensing Systems – Key Issues Consultation Paper (2017:DoHPCLG).
- Preparation of guidance documents for the implementation of EIA directive (Directive 2011/92/EU as amended by 2014/52/EU) – Annex I to the Final Report (COWI, Milieu; April 2017).
- Guidance for Consent Authorities regarding Sub-threshold Development (2003; DoEHLG).

4 THE PROJECT - DESCRIPTION OF DEVELOPMENT

The proposed development adjoins consented development within the same application site boundary, including LRD6042/23 (Block B2 – 40no. apartments, café/restaurant unit (236 sq m) and cultural unit (c. 52 sq m)) and SHD-310567-21 (Block A – 198no. apartments and restaurant/café).

The proposed development comprises mixed use residential, community and commercial redevelopment (c. 26,027 sq m gross floor area), accommodated in 2no. blocks (Block B1 and Block C) ranging in height from 8 to 13 storeys with basement and undercroft, and including: 316no. apartments (178no. 1-bed units and 138no. 2-bed units), with associated private balconies on north, south, east and west building elevations and communal roof terraces at Levels 07, 08, 09 and 12; ancillary internal residents' amenity facilities (c.226 sq m); co-working/community/cultural space available for public hire (c.496 sq. m); ground level retail (c.147 sq. m).

And all associated and ancillary demolition, conservation, landscaping and site development works, including:

- Public open space (c.1,430 sq. m), including a plaza and riverside walkway.
- Residents' communal open space courtyard at ground level between Blocks B1 and C.
- Conservation, refurbishment, repair and adaption of existing protected structures, including:
 - Entrance stone archway (protected structure) to be conserved, refurbished, repaired and adapted for use as pedestrian access to proposed residents' communal open space, entrance foyers to Block B1 and Blocks C1, C2 and C3 and ancillary amenities.

- Riverside stone wall (protected structure) to be conserved, refurbished, repaired and adapted, including partial demolition comprising the enlargement of existing opes and creation of new opes and lintel treatments for incorporation within the riverside stone wall, as part of the proposed riverside amenity walkway.
- Turret (protected structure) at the eastern end of the riverside stone wall to be conserved, refurbished, repaired and adapted as an integrated part of riverside stone wall and proposed amenity walkway.
- Square Tower on riverfront (protected structure) to be conserved, refurbished, repaired and adapted as an integrated part of riverside stone wall proposed and amenity walkway.
- Conservation, refurbishment, repair and adaption of the larger of the two riverfront gabled building ('River Building') for use as gym for residents of the development, accessible from Block C1 undercroft and residents' courtyard at ground level, and incorporation of building as integrated part of riverside stone wall and proposed riverside amenity walkway.
- Conservation, refurbishment, repair and adaption of the southern façade of the smaller riverfront gabled building as part of riverside wall and incorporated with the amenity walkway. Demolition of the remainder of the building fabric.
- Demolition of all other structures within the former Hickey's Fabrics site, including the large single storey warehouse building with curved wall to Parkgate Street and all warehouse internal walls and partitions including the southern brick wall running parallel to the interior of the riverside stone wall, a small two storey building adjacent to the entrance stone archway and the former 2-storey detached house (Parkgate House) at the north west corner of the site, and other miscellaneous structures.
- 2no. new pedestrian site entrances at Parkgate Street, connecting to proposed public plaza and the proposed riverside amenity walkway.
- 1no. new vehicular access via Parkgate Street to surface areas at western edge of the site.
- 24no. car parking spaces (total) at surface.
- 742no. bicycle parking spaces (total) at surface, undercroft and basement levels.
- Ancillary plant, bin storage and remote storage at ground and basement levels.
- Ancillary plant and telecommunications antennae at roof level.
- Solar panels on the roof of proposed Blocks B and C.
- Ancillary works along the southern footpath on Parkgate Street and in the public roadway, including new loading bay, removal of recycling bins and Dublin Bikes Station No. 92 and surface water drainage works including new sections of pipework.

At No. 42A Parkgate Street, Dublin 8 (Protected Structures on site).

5 SCREENING FOR ENVIRONMENTAL IMPACT ASSESSMENT

The proposed development was screened early in the planning design phase to establish the requirement for EIA. In accordance with the EIA Directive, EU Guidelines (2017), EPA Guidelines (2022) and applicable legislation, the project was examined in the context of 'type of development' and 'thresholds'.

Article 4(1) and Annex I of the EIA Directive (2014/52/EU) lists projects for which an EIA is mandatory, whereas Article 4(2) and Annex II lists project types for which an EIA may be required.

The requirement for Environmental Impact Assessment of certain projects under the EIA Directive is transposed into Irish legislation by Part X of the Planning and Development Act 2000, as amended ("the Act"). The specified categories of development in respect of which EIA is required are set out under the Fifth Schedule of the Planning and Development Regulations 2001 as amended ("the Regulations").

The Fifth Schedule of the Regulations lists classes of development where an EIA is mandatory under Part 1 or Part 2, where the project exceeds the relevant threshold, and where an EIA may be required where the proposed development falls short of the relevant threshold but is likely to have significant effects on the environment.

There are four steps in determining need for Environmental Impact Assessment (EIA) for a project which are set out below. Should any of the answers to these four questions be positive, then an EIA is required for the project and an EIAR should be prepared.

5.1 EIA Screening Assessment

5.1.1 Q1A Is the Project an Annex I or Annex II Project as prescribed in the Directive 97/11/EC (after 85/337/EC) as amended in 2003, 2009 or 2014)?

The proposed development comprises mixed use residential, community and commercial redevelopment (c. 25,777 sq m gross floor area) within a site area of **c.0.82 ha**. It comprises 2no. blocks (Block B1 and Block C) ranging in height from 8 to 13 storeys with basement and undercroft, and including: **316no. apartments** (178no. 1-bed units and 138no. 2-bed units), with associated private balconies on all building elevations and communal roof terraces at Levels 07, 08, 09 and 12; ancillary internal residents' amenity facilities (c.226 sq m); multi-functional space accommodating co-working/cultural/community/exhibition uses available for public hire (c.496 sq m); ground level retail (c.147 sq m); and all associated and ancillary demolition, conservation, landscaping and site development works.

We consider that the relevant categories of development to be considered, are those contained in **Schedule 5, Part 2** of the Regulations.

Specifically, Class 10 (b) – Infrastructure Projects, includes: -

“(i) Construction of more than 500 dwelling units...

*(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.)”

SLA bold font emphasis

Having regard to the nature and extent of the proposed development, it is our considered opinion that **the proposed development does not meet or exceed the relevant thresholds for mandatory EIA**, identified above.

We consider each of the relevant thresholds in turn as follows: -

5.1.1.1 Class 10(b)(i) - Construction of more than 500 dwellings

As previously stated, the proposed development scheme seeks permission for the construction of 316no. new dwellings. This represents 63% of the specified 500 dwelling units' threshold. This is significantly below the threshold where a mandatory EIAR would be required.

Cumulatively the combination of the proposed (Blocks B1 and C = 316no. dwellings) and consented scheme (Blocks A and B2 = 238no. dwellings) amounts to 554no. dwellings. EIAR for cumulative consented development amounting to 514no. dwellings was previously prepared under ABP-310567-21. No unacceptable adverse impacts were identified in that EIAR for the relevant environmental factors.

5.1.1.2 Class 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.

This proposal is located within the business district of Dublin City Centre. The site of the proposed development is below the site area threshold (measuring c. 0.82 ha).

Therefore, a *mandatory* EIAR is not required.

5.1.1.3 Class 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.'

As the proposed development does not exceed a quantity, area or other limit specified in Part 2 of Schedule 5, in respect of the relevant class of development (Class 10), we consider the relevant provisions of Class 15 in respect of which a sub-threshold EIAR might be required.

5.1.2 Q1B Is the project likely to have a significant effect on a Natura 2000 site?

We refer the Planning Authority to the **Natura Impact Assessment**, prepared by Altemar which concludes that: -

Following the implementation of the mitigation measures outlined, the construction, excavation and demolition works would not be deemed to have a significant impact on the River Liffey which is considered a direct pathway to five Natura 2000 sites in Dublin Bay. No significant impacts are likely on Natura 2000 sites, alone in combination with other plans and projects based on the implementation of mitigation measures.

5.1.3 Q4 Is the Project likely to have significant effects on the environment?

On the basis of the information above, the proposed development is considered to be outside the mandatory requirements for EIA.

The next step in the screening process is to determine whether there is a requirement for an EIA, where the proposed development is subthreshold.

5.2 Sub-Threshold EIA Considerations

Sub-threshold development means “*development of a type set out in Part 2 of Schedule 5 which does not equal or exceed, as the case may be, a quantity, area or other limit specified in that Schedule in respect of the relevant class of development*”.

As demonstrated above, the relevant thresholds for mandatory EIA have not been exceeded by the proposed development. An EIAR will nonetheless be required in respect of sub-threshold development where the Planning Authority considers that the proposed development would be likely to have significant effects on the environment.¹

The Departmental Guidelines (August 2018) state in relation to such a preliminary EIA screening that:

“3.4. For all sub-threshold developments listed in Schedule 5 Part 2, where no EIAR is submitted or EIA determination requested, a screening determination is required to be undertaken by the competent authority unless, on preliminary examination it can be concluded that there is no real likelihood of significant effects on the environment. This is initiated by the competent authority following the receipt of a planning application or appeal.

It may be noted that a number of environmental assessments have been undertaken in respect of the proposed development and accompany the planning application. This includes a **Natura Impact Statement** and **Ecological Impact Assessment Report** prepared by Altemar Environmental Consultancy enclosed within the application. We refer otherwise to the schedule of plans and particulars that accompany the application.

¹ See s. 172(1)(b) of the Planning and Development Act 2000, as amended.

The proposed development is not materially different in location, nature, scale or effect that that previously consented and subject of EIA. No significant adverse impacts were predicted in that case and no new considerations arise for the proposed development.

We refer the Planning Authority generally to the accompanying Architectural Design Statement and elevational drawings prepared by Reddy Architecture + Urbanism for details on the proposed building height, massing and architectural expression.

We refer also to the enclosed photomontage verified views, prepared by ModelWorks and associated Visual Impact Assessment, prepared by ARC.

Furthermore, we refer the Planning Authority to the enclosed Architectural Heritage Impact Assessment (AHIA), prepared by ARC.

Site Works

The proposed development includes associated and ancillary demolition, conservation, landscaping and site development works, including:

- Public open space (c.1,430 sq. m), including a plaza and riverside walkway.
- Residents' communal open space courtyard at ground level between Blocks B1 and C.
- Conservation, refurbishment, repair and adaption of existing protected structures, including:
 - Entrance stone archway (protected structure) to be conserved, refurbished, repaired and adapted for use as pedestrian access to proposed residents' communal open space, entrance foyers to Block B1 and Blocks C1, C2 and C3 and ancillary amenities.
 - Riverside stone wall (protected structure) to be conserved, refurbished, repaired and adapted, including partial demolition comprising the enlargement of existing opes and creation of new opes and lintel treatments for incorporation within the riverside stone wall, as part of the proposed riverside amenity walkway.
 - Turret (protected structure) at the eastern end of the riverside stone wall to be conserved, refurbished, repaired and adapted as an integrated part of riverside stone wall and proposed amenity walkway.
 - Square Tower on riverfront (protected structure) to be conserved, refurbished, repaired and adapted as an integrated part of riverside stone wall proposed and amenity walkway.
- Conservation, refurbishment, repair and adaption of the larger of the two riverfront gabled building ('River Building') for use as gym for residents of the development, accessible from Block C1 undercroft and residents' courtyard at ground level, and incorporation of building as integrated part of riverside stone wall and proposed riverside amenity walkway.
- Conservation, refurbishment, repair and adaption of the southern façade of the smaller riverfront gabled building as part of riverside wall and incorporated with the amenity walkway. Demolition of the remainder of the building fabric.
- Demolition of all other structures within the former Hickey's Fabrics site, including the large single storey warehouse building with curved wall to Parkgate Street and all warehouse internal walls and partitions including the southern brick wall running parallel to the interior of the riverside stone wall, a small two storey building adjacent to the entrance stone archway and the former 2-storey detached house (Parkgate House) at the north west corner of the site, and other miscellaneous structures.
- 2no. new pedestrian site entrances at Parkgate Street, connecting to proposed public plaza and the proposed riverside amenity walkway.
- 1no. new vehicular access via Parkgate Street to surface areas at western edge of the site.
- 24no. car parking spaces (total) at surface.
- 742no. bicycle parking spaces (total) at surface, undercroft and basement levels.

- Ancillary plant, bin storage and remote storage at ground and basement levels.
- Ancillary plant and telecommunications antennae at roof level.
- Solar panels on the roof of proposed Blocks B and C.
- Ancillary works along the southern footpath on Parkgate Street and in the public roadway, including new loading bay, removal of recycling bins and Dublin Bikes Station No. 92 and surface water drainage works including new sections of pipework.

We refer the Planning Authority to the enclosed **Drainage Report** and accompanying drawings, prepared by ARUP Group for details pertaining to stormwater and foul drainage and water supply. We also refer to the enclosed Landscape Plans, prepared by Stephen Diamond Landscape.

The nature and extent of the proposed site works are not considered to be so extraordinary in the context of this urban site as not to be capable of the reasonable implementation of best practice mitigation measures or methods, to avoid or reduce potential for significant environmental effects. We refer to the following reports, enclosed with this application which identify the relevant construction mitigation measures to control noise, dust and or other emissions expected to arise from the proposed development: -

- Construction Environmental Management Plan, prepared by ARUP Group.
- Resource and Waste Management Plan, prepared by AWN.
- Flood Risk Assessment, prepared by ARUP Group.
- Basement Impact Assessment Report, prepared by prepared by ARUP Group.
- **Natura Impact Statement** and **Ecological Impact Assessment Report**, prepared by Altemar Ecological Consultancy.
- Architectural Heritage Impact Assessment Report, prepared by ARC.

5.2.1.1 Nature of any associated demolition works

The proposed development demolition of all non-protected structures within the former Hickey's Fabrics site, including the large single storey warehouse building with curved wall to Parkgate Street and all warehouse internal walls and partitions including the southern brick wall running parallel to the interior of the riverside stone wall, a small two storey building adjacent to the entrance stone archway and the former 2-storey detached house (Parkgate House) at the north west corner of the site, and other miscellaneous structure.

We refer the Planning Authority to the enclosed demolition drawings and **Demolition Justification Report** prepared by Reddy Architecture + Urbanism which provides a reasonable rationale as to why those buildings on site cannot be repurposed to provide mixed-use development per the Z5 land use Zoning Objective and SDRA 7 designation by Dublin City Council.

5.2.1.2 Use of Natural Resources (Soil, Land, Water, Biodiversity)

The proposed basement level will require excavation works on site.

Spoil generated during excavation works will be tested for reuse or disposed of in accordance with the Waste Management Act 1996-2011.

The **Construction & Environmental Management Plans (CEMP)**, prepared by ARUP Group, identifies a preliminary methodology for addressing the process of excavation, reuse and transportation of spoil as necessary.

The enclosed **Resource Waste Management Plan (RWMP)**, prepared by AWN Consulting provides the information necessary to ensure that the management of construction and demolition (C&D) waste at the site is undertaken in accordance with the current legal and industry standards. In particular, the CDWMP aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible. It also seeks to provide guidance on the appropriate collection and transport of

waste from the site to prevent issues associated with litter or more serious environmental pollution (e.g. contamination of soil and/or water). This RWMP includes information on the legal and policy framework for Construction & Demolition waste to be generated by the proposed development and makes recommendations for management of different waste streams.

Ecological assessments of the subject site have been prepared to determine the likely presence of flora, fauna and habitats that would require protection. We refer the Planning Authority to the accompanying **Natura Impact Statement** and **Ecological Impact Assessment Report**, prepared by Altemar Ecological Consultancy and to the **Arboricultural Impact Assessment** prepared by CMK Hort + Arb.

We refer the Planning Authority to the **Drainage Report** prepared by ARUP Group which provides details in respect of Surface Water Drainage, Waste Water Drainage and Potable Water Infrastructure.

The enclosed **Site-Specific Flood Risk Assessment**, prepared by ARUP Group confirms that flood risk to the site is low and existing ground levels are above the maximum 1% AEP fluvial water level and the 0.5% AEP tidal level. The risk of groundwater and pluvial flooding is also low.

In our opinion, having regard to the findings of the assessments that accompany the planning application, the proposed development does not give rise to any significant new environmental impacts.

5.2.1.3 Production of Waste

An **Operational Waste Management Plan**, prepared by AWN Consulting, accompanies the application and outlines the strategy for management of waste from the proposed development during operational stages of the proposed development.

The enclosed **Resource Waste Management Plan (RWMP)**, prepared by AWN Consulting, provides the information necessary to ensure that the management of construction and demolition (C&D) waste at the site is undertaken in accordance with the current legal and industry standards.

5.2.1.4 Pollution and Nuisance

Construction activities, including noise, vibration and dust emissions, could potentially have adverse impacts on the amenities of neighbouring properties and the local road network, during the construction stage. A **Construction & Environmental Management Plan**, prepared by ARUP Group, accompanies this application to ensure that appropriate mitigation measures are employed to avoid adverse impact on the amenities of neighbouring properties and the local road network arising from construction activities and the potential nuisances associated with same.

The potential for soil/and or water pollution during the operation phase is also addressed in the **Construction & Environmental Management Plan**, prepared by ARUP Group.

5.2.1.5 Risk of Major Accidents and / or Disaster

The proposed development would not involve the use of technologies or substances that would present a significant risk of major accident or environmental disaster at this location.

The application site is not proximate to any Seveso/COMAH designated sites.

5.2.1.6 Risk to Human Health

Similar to all construction sites, construction works giving rise to air and noise emissions that have the potential to impact human health. Appropriate mitigation measures are identified in the **Construction & Environmental Management Plan** prepared by ARUP Consulting Engineers, is enclosed with this application. The mitigation measures of the final CEMP to be agreed with the planning authority will apply equally to any permission for the proposed development.

An **Operational Waste Management Plan**, prepared by AWN Consulting is submitted with this application for the proposed development.

In terms of water integrity, the subject site is serviced. Therefore the development can be connected to public foul and surface water systems. We refer the Planning Authority to the enclosed **Drainage Report**, prepared by ARUP Group for further detail.

5.2.2 Location of Proposed Development²

5.2.2.1 Existing Land Use

The proposed development is located on a brownfield site, last occupied by Hickey's Fabrics warehouse and main office, primarily zoned Z5. It is considered that the proposed development is consistent with the current land use zoning and the wider land uses in the surrounding area.

The applicant has engaged a qualified ecological consultant (Altemar Ecological Consultants) to assess whether proposed development is likely to have a significant environmental impact on any European sites. We refer the Planning Authority to the **Natura Impact Statement** and the **Ecological Impact Assessment Report** (both of which accompany this application) which conclude that significant effects are not likely to arise, either alone or in combination with any other plans or projects resulting in significant effects on the integrity of the Natura 2000 network.

The Dublin City Development Plan 2022-2028 has been the subject of Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) as part of the statutory Plan preparation process.

Adequate water and power are available for the needs of the proposed development. We refer the Planning Authority to the enclosed **Drainage Report**, prepared by ARUP Group for further detail.

The application site has already been deemed capable of absorbing the nature and extent of the proposed development through the Development Plan making process, including a process of SEA and AA.

For the avoidance of doubt, the application site is not within or directly connected to a wetland, riparian areas and river mouths, nor is it in a coastal or marine environment, a mountain or forest area, or a nature reserve or park. It does not form part of any Natura 2000 site. The site is not in an area where there has already been a demonstrated failure to meet the environmental quality standards, laid down in EU legislation and relevant to the project.

The various reports that have accompany this planning application in relation to ecology, transportation, flood risk, energy, set out that the development is capable of being absorbed into the existing environment.

It is highlighted that the application site accommodates protected structures and is set within the wider conservation setting of the River Liffey and its banks and quays, we refer the Planning Authority to the enclosed **Archaeological Impact Assessment Report**, prepared by Courtney Deery Archaeology and **Architectural Heritage Impact Assessment**, prepared by ARC which address the potential impacts on the heritage and archaeological setting.

5.2.3 Aspects of the Environment Likely to be Affected by the Proposed Development³

As indicated above, a range of expert reports have addressed a number of different aspects of the environment that could potentially be affected by the proposed development. These reports describe the aspects of the environment likely to be affected, in so far as these are relevant to the particular circumstances of the proposed development.

A summary of these reports is set out below: -

² This section addresses the information required under paragraph 1(b) of Schedule 7A of the 2001 Regulations, as amended.

³ This section addresses the information required under paragraph 2 of Schedule 7A of the 2001 Regulations, as amended.

5.2.3.1 Construction Environmental Management Plan

We refer the Planning Authority to the **Construction Environmental Management Plan (CEMP)** prepared by ARUP Group, which accompanies this application. This report addresses general site setup, pre-commencement measures, demolition works, working hours, traffic management, dust control and noise control all associated with the construction works. It provides an outline of the methods and sequence in which construction and demolition works will be carried out.

The final Construction Management Plan and strategy will be prepared by the appointed contractor in accordance with the measures detailed in this report.

A **Resource Waste Management Plan**, prepared by AWN Consulting is also enclosed with this application. The purpose of this plan is to provide information necessary to ensure that the management of construction and waste at the site is undertaken in accordance with the current legal and industry standards. This Plan aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible. It also seeks to provide guidance on the appropriate collection and transport of waste from the site to prevent issues associated with litter or more serious environmental pollution (e.g., contamination of soil and/or water). This RWMP includes information on the legal and policy framework for construction waste management in Ireland, estimates of the type and quantity of construction waste to be generated by the proposed development and makes recommendations for management of different waste streams.

5.2.3.2 Flood Risk Assessment

The enclosed **Site-Specific Flood Risk Assessment**, prepared by ARUP Group confirms that flood risk to the the site is low and existing ground levels are above the maximum 1% AEP fluvial water level and the 0.5% AEP tidal level. The risk of groundwater and pluvial flooding is also low

This Report has been carried out in accordance with the Department of Housing and Local Government (DEHLG) and the office of Public Works (OPW) document "The Planning Process and Flood Risk Management Guidelines for Planning Authorities" published in November 2009.

5.2.3.3 Transportation Assessment

The enclosed **Transport Statement** has been prepared by ARUP Group which finds: -

It has been clearly demonstrated that this site avails of excellent conditions with regards to sustainable transport, which provides an opportunity to propose a transport strategy that is based upon walk, cycle and public transport, rather than the use of private car, especially for commuting purposes.

It is therefore proposed that a limited car parking provision is based upon the innovative proposal for a bespoke car club, catering for the occasional needs of residents for car trips.

In addition, significant provision of cycle parking and proactive soft measures as part of a Travel Plan, will further encourage residents and employees alike to choose sustainable modes of transport for their journeys.

The transport strategy associated with the development also means that the traffic impact associated with the proposals is negligible.

We also refer the Planning Authority to Section 5 the enclosed Transport Statement which provides a **Travel Plan**.

5.2.3.4 Natura Impact Statement

We refer the Planning Authority to the **Natura Impact Statement**, prepared by Altemar Ecological Consultants, enclosed with this application. The report concludes: -

Following the implementation of the mitigation measures outlined, the construction, excavation and demolition works would not be deemed to have a significant impact on the River

Liffey which is considered a direct pathway to five Natura 2000 sites in Dublin Bay. No significant impacts are likely on Natura 2000 sites, alone in combination with other plans and projects based on the implementation of mitigation measures.

5.2.3.5 Ecological Impact Assessment

We refer the Planning Authority to the **Ecological Impact Assessment**, prepared by Altemar Ecological Consultants, enclosed with this application. document comprises an appraisal of the likely effects on biodiversity (flora and fauna) of the proposed development.

5.2.3.6 Arboricultural Assessment Report

We refer the Planning Authority to the **Arboricultural Assessment Report** and associated **Arboricultural drawings** which have been prepared by CMK Hort + Arb and enclosed as part of this planning application. The Report finds: -

The proposed development of Blocks B1 & C [the proposed development] do not necessitate the removal of the existing trees however permission has been granted for their removal for the development of Block A [permitted under ABP-310567-21, as amended by DCC Reg. Ref. LRD6042/23-S3A].

The impact on trees of the proposed development as shown on drawing TPAR002 102 Arboricultural Impact will be locally significant in terms of the treescape in this location. However it is considered that given the nature of the planting and the trees proximity to the existing buildings which limit their long term potential the overall significance of their loss is reduced.

5.2.3.7 Landscape & Visual Impact Assessment

We refer the Planning Authority to the enclosed **Landscape and Visual Impact Assessment**, prepared by ARC.

The purpose of this study is to assess the likely impact of the proposed development on the existing landscape settings of the site (i.e. change in landscape character and visual impact) and describe any mitigation measures. This assessment should be read in conjunction with the **Photomontages** of the proposed scheme, prepared by Modelworks.

Consideration of landscape and visual aspects of the scheme has been integral in the architectural design, layout, and landscaping measures proposed. Tree protection, site hoarding, appropriate lighting, traffic management and phasing, as part of a well-managed site is key to minimising adverse visual impact during construction stage.

5.2.3.8 Archaeological Impact Assessment

We refer the Planning Authority to the enclosed **Archaeological Assessment**, prepared by Courtney Deery Archaeology which finds: -

There will be no direct impact on any recorded archaeological sites. The subject site lies within the designated zone of notification for the historic city of Dublin RMP DU018-020, however, there are no specific recorded sites (RMP / SMR sites) within the boundary of the site or in its immediate vicinity.

There is significant ground contamination (heavy metals etc.) within the proposed development site. The presence of these contaminated deposits has led to a development design that leaves these fills in situ, with a consequent reduction in the depth of any ground disturbance. Given this and the depth of the made-ground within the proposed development site, the potential to impact on any previously unknown archaeological deposits that may be present at pre-reclamation levels is limited. The basement excavation and piling required for the proposed

development of Blocks B and C would, however, result in a moderate negative permanent effect on any such deposits that may be present.

5.2.3.9 Sunlight, Daylight & Shadow Analysis

We refer the Planning Authority to the enclosed Sunlight, Daylight & Shadow Analysis Report, prepared by IN2 which finds: -

Communal Open space

that all amenity spaces were found to be compliant with the BRE Guide. Every proposed amenity space receives at least 2 hours of direct sunlight on March 21st.

Internal Daylight Analysis

The overall scheme was determined to be 90% compliant with the methodology utilised.

Sunlight Analysis

It was determined that 87% of the assessed units were found to be compliant for the BRE Guide recommended sunlight hours.

Impact on Neighbouring Dwellings (Daylight)

The analysis indicated that all existing residences on Montpelier Hill assessed for daylight impact were found to achieve full compliance with BRE recommendations, as VSC values were predicted to be either remain above 27% and or any reduction was less than 20%. These dwellings would therefore not be adversely affected by the proposed development in terms of receipt of natural light.

Impact on Neighbouring Dwellings (Sunlight)

Similarly, analysis undertaken for sunlight availability determined BRE compliance with regards to all existing dwellings assessed on Montpelier Hill, confirming their currently received sunlight would not be adversely affected by the proposed development.

5.2.3.10 Climate Action & Energy Statement

We refer the Planning Authority to the enclosed **Climate Action & Energy Statement**, prepared by IN2. The Report confirms that the proposed development will achieve NZEB compliance.

The proposed development is located in the city centre with access to high frequency and high-capacity transport links.

Planning Policy Context

The proposed development is consistent with the other relevant policies and objectives of the Dublin City Development Plan 2022-2028. The plan came into effect on 14 December 2022 and is the statutory land-use plan governing the subject lands at this time.

We refer the Planning Authority to the **Planning Application Report** enclosed with this planning application, compiled by Stephen Little & Associates which outlines the proposed developments consistency with all of the relevant policies and objectives of the Dublin City Development Plan.

Micro-Climatic Effects

We refer the Planning Authority to the **Daylight & Sunlight Analysis** and **Microclimatic Wind Analysis and Pedestrian Comfort Report**, prepared by IN2 as submitted as part of this planning application.

Construction and Construction & Demolition Waste Management

It is anticipated that a potential construction related nuisance will be appropriately controlled, short-term and not significant to human health.

Assuming that the mitigation measures set out in the **Outline Construction Environmental Management Plan (CEMP)** prepared by ARUP Group will be implemented, the proposed development is not likely to give rise to potential for significant adverse impact on the environment that would give rise to risk to human health relating to emissions to air or water.

The construction phase of the proposed development will provide for the temporary employment of construction workers which is likely to provide benefits for local businesses providing retail or other services to construction workers and potentially could create some additional employment in the area.

It is concluded that the proposed development has potential to give rise to some short-term adverse impacts during construction stage, which can be mitigated through the implementation of a **Construction Environmental Management Plan** prepared by ARUP Group.

Flood Risk

A Site-Specific Flood Risk Assessment (SSFRA), prepared by ARUP is enclosed with this application and confirms that flood risk to the site is low and existing ground levels are above the maximum 1% AEP fluvial water level and the 0.5% AEP tidal level. The risk of groundwater and pluvial flooding is also low.

We refer also to the enclosed **Arboricultural Impact Assessment** prepared by the CMK Hort + Arb which finds: -

The proposed development of Blocks B1 & C [the proposed development] do not necessitate the removal of the existing trees however permission has been granted for their removal for the development of Block A [permitted under ABP-310567-21, as amended by DCC Reg. Ref. LRD6042/23-S3A].

The impact on trees of the proposed development as shown on drawing TPAR002 102 Arboricultural Impact will be locally significant in terms of the treescape in this location. However it is considered that given the nature of the planting and the trees proximity to the existing buildings which limit their long term potential the overall significance of their loss is reduced.

5.3 Conclusion

EIA is a mandatory requirement for development projects of a class specified in Part 1 or 2 of Schedule 5. The proposed development is subthreshold the relevant classes of development.

This EIA Screening Report seeks to assist the Planning Authority in its determination of the likelihood of significant effects on the environment arising from the proposed development. Due to the nature and extent of the proposed development, its location on lands zoned for mixed use development, and that it is consistent with the emerging pattern of development in this area, the proposed development, on its own or in combination with the consented scheme, is not considered likely to result in any long-term significant impacts on its surrounding environment. Consideration has been given to the following: -

- The location of the proposed development at Z5- City Centre zoned lands.
- The emerging pattern of development in the area and government strategy to deliver much needed housing.
- The findings of the following Reports enclosed with this application: -
 - Climate Action and Energy Statement, prepared by IN2.
 - Landscape and Visual Impact Assessment, prepared by ARC.
 - Daylight and Sunlight Analysis, prepared by IN2.
 - Drainage Report, prepared by ARUP Group.
 - Site Specific Flood Risk Assessment, prepared by ARUP Group.

- Traffic and Transportation Assessment, prepared by ARUP Group.
- Mobility Management Plan, prepared by ARUP Group.
- Planning Report and Statement of Consistency, prepared by Stephen Little and Associates.
- The mitigation and monitoring measures outlined in the accompanying Reports –
 - Natura Impact Statement, prepared by Altemar.
 - Ecological Impact Assessment Report, prepared by Altemar.
 - Arborist Report, prepared by CMK Hort + Arb.
 - Architectural Heritage Impact Assessment Report, prepared ARC.
 - Archaeological Impact Assessment Report, prepared by Courtney Deery Archaeology.
 - Construction Environmental Management Plan, prepared by ARUP Group.
 - Basement Impact Assessment, prepared by ARUP Group.

The need for environmental impact assessment can, in our professional opinion, be excluded. However, we recognise that the Planning Authority is the competent authority in this regard.

STEPHEN LITTLE & ASSOCIATES

December 2024

Stephen Little & Associates are committed to progressing and achieving sustainable development goals.

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