



ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR)

+ Screening Assessment

In respect of

PROPOSED LARGE SCALE RESIDENTIAL DEVELOPMENT OF 2.54 HECTARES AT KNOCKRABO, MOUNT ANVILLE ROAD, GOATSTOWN, DUBLIN 14, INCLUDING WORKS TO CEDAR MOUNT (A PROTECTED STRUCTURE) AND KNOCKRABO GATE LODGE (WEST) (A PROTECTED STRUCTURE).



PREPARED FOR:

KNOCKRABO INVESTMENTS DAC,
32 Molesworth Street,
Dublin 2.

PREPARED BY:

TOM PHILLIPS + ASSOCIATES
80 Harcourt Street,
Dublin 2, D02 F449.

1st November 2024





TABLE OF CONTENTS

1.0	INTRODUCTION.....	3
2.0	THE PROPOSED DEVELOPMENT	3
2.1	Site and Locational Context	7
3.0	LEGISLATIVE BASIS FOR EIA.....	9
3.1	EIA Directive.....	9
3.2	The Acts and Regulations	9
3.3	Article 44A (1) of the Regulations	12
3.3.1	DIRECTIVE 92/43/EEC, THE HABITATS DIRECTIVE & BIRDS DIRECTIVE (DIRECTIVE 2009/147/EC On The Conservation Of Wild Birds).....	13
3.3.2	DIRECTIVE 2007/60/EC, FLOODS DIRECTIVE	14
3.3.3	DIRECTIVE 2002/49/EC, ENVIRONMENTAL NOISE DIRECTIVE	14
3.3.4	DIRECTIVE 2001/42/ EC, SEA DIRECTIVE	16
3.3.5	DIRECTIVE 2008/98/EC WASTE FRAMEWORK DIRECTIVE & DIRECTIVE 1999/31/EC LANDFILL DIRECTIVE.....	16
3.3.6	SEVESO III DIRECTIVE (2012/110/EU)	18
3.4	Schedule 7 of the Regulations	19
3.4.1	Assessment under Schedule 7 of the <i>Regulations</i>	20
4.0	CONCLUSION	0



1.0 INTRODUCTION

This EIA Screening Assessment has been prepared with respect to an application for planning permission (the project) under Section 34 of the *Planning and Development Acts 2000 (as amended)* (“the Acts”) to Dun Laoghaire Rathdown County Council (DLRCC).

This EIA Screening has been prepared having regard to the *Planning and Development Regulations 2001 (as amended)* (“the Regulations”). This EIA Screening Assessment confirms that the project does not exceed a threshold specified in Part 1 of Schedule 5 of the Regulations, which requires the mandatory preparation of an EIA.

The project may be considered to constitute sub-threshold development, i.e. is of a class specified in Part 2 of Schedule 5 of the Regulations, but does not equal or exceed the relevant quantity, area or other limit specified in that Class. The screening assessment which has been undertaken in accordance with Schedule 7A of the Regulations has concluded that the works, individually and cumulatively, would not give rise to any significant effects on the environment, which would require the preparation of an EIA.

2.0 THE PROPOSED DEVELOPMENT

The following section sets out the description of the proposed development in respect of this application to DLRCC. Further detail regarding the proposed development is included with the application material submitted to DLRCC as part of the application for planning permission.

“Knockrabo Investments DAC intend to apply for permission for a Large-scale Residential Development (for a period of 7 years) with a total application site area of c. 2.54 hectares, at Knockrabo, Mount Anville Road, Goatstown, Dublin 14. The proposed development relates to Phase 2 of the development on the ‘Knockrabo’ lands. Phase 1 of ‘Knockrabo’ was granted under Dún Laoghaire-Rathdown County Council (DLRCC) Reg. Ref. D13A/0689/An Bord Pleanála (ABP) Ref. PL06D.243799 and DLRCC Reg. Ref. D16A/0821 (Phase 1) and DLRCC Reg. Ref. D16A/0960 (Phase 1A) and comprises a total of 119 No. units.

The site is bounded to the south-east by Mount Anville Road; to the south by ‘Mount Anville Lodge’ and by the rear boundaries of ‘Thendara’ (a Protected Structure – RPS Ref. 812), ‘The Garth’ (a Protected Structure – RPS Ref. 819), ‘Chimes’, ‘Hollywood House’ (a Protected Structure – RPS Ref. 829); to the south-west by existing allotments; to the north by the reservation corridor for the Dublin Eastern By-Pass (DEBP); and to the east by the site of residential development ‘Knockrabo’ (Phase 1, permitted under DLRCC Reg. Ref. D13A/0689 / An Bord Pleanála (ABP) Ref. PL.06D.243799 and DLRCC Reg. Ref. D16A/0821 (Phase 1); and DLRCC Reg. Ref. D16A/0960 (Phase 1A)). The site includes ‘Cedar Mount’ (a Protected Structure- RPS Ref. 783), ‘Knockrabo Gate Lodge (West)’ (a Protected Structure RPS Ref. 796), including Entrance Gates and Piers.

The development with total of c.17,312.2 sq.m. gross internal area (GIA) will consist of the construction of 158 No. residential units (12 No. houses and 146 No. apartments (35 No. 1 beds, 81 No. 2 beds, 3 No. 3 beds and 27 No. 3 bed duplex units), a childcare facility (c.400 sq.m. GIA) and Community / Leisure Uses (c. 223 sq.m. GIA), as follows:



- *Block E (c.1,077 sq.m. GIA): a 5-storey including semi-basement podium level apartment block, comprising 8 No. apartments (1 No. 1 bed and 7 No. 2 beds);*
- *Block F: (c.8,390.8 sq.m. GIA): a part 2 to part 8 storeys including semi basement podium apartment block, comprising 84 No. units (31 No. 1 beds, 50 No. 2 beds and 3 No. 3 bed duplex units);*
- *Block G: (c.2,022.1 sqm GIA): a part 4 to part 5-storey apartment block, comprising 20 No. units (3 No. 1 bed units, 14 No. 2 bed units and 3 No. 3 bed units); (with sedum roof/PV panels at roof level of Blocks E, F and G; a communal Roof Terrace of c. 198 sqm on Block F; and balconies/wintergardens on all elevations of Blocks E, F and G);*
- *Duplex Blocks: (c. 3,292.6 sqm GIA): 1 No. 3 storey and 1 No. 4 storey block, comprising a total of 32 No. units (8 No. 2 bed units and 24 No. 3 bed duplex units);*
- *10 No. (new build) houses: 6 No. 4 bed 2.5-3 storey terraced/semi-detached units (ranging in size from c.162.1 sqm GIA to c.174.2 sq.m. GIA); 1 No. 3 bed 2 storey detached unit (126.2 sq.m. GIA); 1 No. 3 bed 2 storey mid terrace unit (c.129.2 sq.m. GIA); 1 No. 3 bed 2 storey end of terrace unit (c.129.2 sq.m. GIA); and 1 No. 1 - 2 storey 'Gate House' (c. 122.6 sq.m. GIA) to the west of proposed repositioned entrance to Cedar Mount from Mount Anville Road;*
- *The use of existing 'Coach House' as a residential dwelling and for internal / external repair / refurbishment works at ground and first floor levels, including the removal of 3 No. roof lights, 1 No. metal clad dormer roof window and external water tank; the construction of 2 No. single storey flat roof extensions (c.35.5 sq.m. GIA), revisions to the external facade including the addition of 1 No. new window ope on the south facade and rendered finish to all original facades, solar panels at roof level; removal / re-use of stone to form new garden wall; to provide 1 No. 2 bed house (c. 99.5 sq.m. GIA) with refurbished stone shed (c. 13.9 sq.m. for storage GIA).*
- *The use of Knockrabo Gate Lodge (West) (a Protected Structure) as a residential dwelling; and for repair / refurbishment works including demolition of existing section of extension on top of stone boundary wall; removal of 1 No. roof light and 1 No. internal partition wall; construction of replacement extension (c.77.5 sq.m. GIA) to provide 1 No. 3-bed unit (c. 128 sq.m. GIA) with solar panels at roof level, bin storage, landscaping, all repair works to the existing Gate and Piers, and all associated internal and external elevational changes.*
- *The proposed development comprises works to Cedar Mount (a Protected Structure) to provide: 1 No. Childcare Facility at Lower Ground Floor level (c.400 sq.m. GIA) with associated external play and bin storage areas; Community / Leisure Uses at Ground Floor Level (c. 223 sq.m. GIA), comprising Gym / Studio (c.35.6 sq.m. GIA), Library / Office (c. 35.9 sq.m. GIA), Meeting room (c.28.4 sq.m. GIA) and Conservatory room (c. 21.6 sq.m. GIA); and 2 No. 2 bed apartments at 1st floor level, (c.77.6 sq.m. GIA and c.88.2 sq.m. GFA). The works to Cedar Mount to consist of:*
 - *At lower ground floor/ basement level, the removal of internal walls and sections of external and internal walls and access doors; insertion of openings through external and internal walls; repair of existing "loggia" (covered external corridor) on northern, north-western and north-eastern facades, with revised elevations comprising glazed panels / glazed entrance doors located within loggia opes; the additional area (c. 58 sq.m. GIA) to form part of proposed Childcare Facility;*
 - *At ground floor level removal of wooden staircase to 1st floor level and replacement with open-tread staircase, and construction of conservatory room (c. 21.6 sqm GIA) with flat roof on south - western side of Cedar Mount with sedum roof; removal of 1 No. WC;*



- At 1st floor level removal of sections of internal walls; insertion of doors through internal walls;
- Re-instatement of 1 no. new chimney stack on the western end of the existing roof; replacement of rubble masonry finish with lime and sand plaster finish on all elevations relating to sections of original façade; removal of security bars from existing windows in front porch; replacement / reconfiguration of rainwater downpipes, hopper heads and associated roof outlets; Re-modelling of extension on northern side including replacement of timber / pressed metal cladding with brick / zinc cladding and glazing at ground and 1st floor levels, removal / replacement of external doors and windows; replacement of flat roof deck, parapet, eaves and roof-light with flat roof comprising brick / zinc clad parapet and removal of internal link at 1st floor level; repair works to external walls at ground floor level; Construction of rendered blockwork wall and steel handrail to terrace and associated repair works to section of existing parapet wall on eastern side of Cedar Mount; all hard and soft landscaping; revisions to garden wall and pillars on western side of Cedar Mount; and all associated internal and elevational changes; and
- The repositioning of existing access (including gates and piers) to Cedar Mount (a Protected Structure) on Mount Anville Road to the northeast with associated works to boundary wall to Mount Anville Road.

The development will also provide 130 No. car parking spaces consisting of 117 No. residential spaces (comprising 54 No. at podium level, 63 No. on-street and on curtilage spaces, 6 No. visitor spaces and 2 No. on-street car sharing spaces); and 5 No. non-residential spaces; provision of 366 No. bicycle parking spaces (consisting of: 288 No. residential spaces, 70 No. (residential) visitor spaces, 6 No. (non-residential) spaces and 2 No. visitor (non-residential) spaces); and 9 No. motorcycle parking spaces.

All other ancillary site development works to facilitate construction, site services, piped infrastructure, 1 No. sub-station, plant, public lighting, bin stores, bike stores, boundary treatments, provision of public, communal and private open space areas comprising hard and soft landscaping, site services all other associated site excavation, infrastructural and site development works above and below ground. In addition to the repositioned access to Cedar Mount (a Protected Structure) as referenced above, the development will be served by the permitted access road 'Knockrabo Way' (DLRCC Reg. Ref. D13A/0689; ABP Ref. PL.06D.243799, DLRCC Reg. Ref. D16A/0821 and DLRCC Reg. Ref. D16A/0960). The application does not impact on the future access to the Reservation for the Dublin Eastern Bypass.

The planning application may be inspected online at the following website: www.knockrabolrd.ie. The planning application may be inspected or purchased at a fee not exceeding the reasonable cost of making a copy, at the offices of Dún Laoghaire-Rathdown County Council, Marine Road, Dún Laoghaire, Co. Dublin, during its public opening hours of Monday to Friday from 10:00am to 4:00pm. A submission or observation in relation to the application may be made in writing to the planning authority on payment of the prescribed fee (€20.00) within the period of 5 weeks beginning on the date of receipt by the authority of the application, and such submissions or observations will be considered by the planning authority in making a decision on the application. The planning authority may grant permission subject to or without conditions, or may refuse to grant permission."



Figure 2.1: Extract of Proposed Site Layout Plan (Source: OMP Architects, Dwg. No. 1307G-OMP-00-00-DR-A-1010).

2.1 Site and Locational Context



Figure 2.2: Indicative Site Location - Site outlined in red. (Source: Google Earth, annotated by Tom Phillips + Associates, 2024).

The subject site comprises a parcel of lands at Knockrabo, Mount Anville Road, Dublin 14, as illustrated in Figure 2.1.

The site is bounded as follows:

- to the south by Mount Anville Road;
- to the south-west by the rear boundaries of residential properties ('Mount Anville Lodge', 'Thendara' (a Protected Structure RPS Ref. 812), 'The Garth' (a Protected Structure RPS Ref. 819), 'Chimes', 'Hollywood House' (a Protected Structure RPS Ref. 829).
- To the southwest by existing allotments;
- to the north by the Reservation Corridor for the Dublin Eastern By-Pass (DEBP); and
- to the east by Phase 1 of the Knockrabo development (permitted under DLRCC Reg. Ref.: D13A/0689; ABP Ref. PL.06D.243799, DLRCC Reg. Ref. D16A/082; and DLRCC Reg. Ref. D16A/0960 (Phase 1A)).

The Planning Application comprises Phase 2 of permitted residential development, occupying the western side of the overall Knockrabo site.

The site comprises an area of c.2.54 hectares and is predominantly greenfield, and consists of grounds sloping northwards away from Mount Anville Road, with levels ranging from +76m OD at Mount Anville Road to +59m OD at the northern end of the site.



The site includes a series of structures, namely Cedar Mount (a Protected Structure, RPS Ref. 783) and its former coach house building, and Knockrabo Gate Lodge (West) including gates and piers (a Protected Structure, RPS Ref. 796). We note that all of the proposed works to the protected structures has been permitted under permission DLRCC Re. Ref. D17A/1224.

It is proposed that access to the site will be from Knockrabo Way, the established access route from Mount Anville Road to the reservation corridor of the Dublin Eastern By Pass to the north of the overall Knockrabo lands. A local access road will provide access to Block E, with a secondary access road proposed to serve Blocks G and F. Access will be provided to Knockrabo Gate Lodge (West) and to Cedar Mount, providing access to a shared surface environment in this part of the site.

The site is located in the suburban area of Goatstown, Dublin 14 and as noted above, to the northern side of Mount Anville Road. The junction with Goatstown crossroads is located within 400m to the west of the site and the junction with Roebuck is within c.700 metres to the northeast.

The site is located within 1.4km of the N11 Strategic Road Corridor, located to the northeast of the site. The site is also within 2.8km of the M50, providing convenient access to the national road motorway network.

On 23rd January 2015, An Bord Pleanála granted permission for a residential development comprising 88 No. dwellings (47 No. houses, including Knockrabo existing Gate Lodge (East) and 41 No. apartments), on a site of 2.54 hectares at Knockrabo, Mount Anville Road, Goatstown, Dublin 14, representing Phase 1 of development on Knockrabo lands.

A planning application was lodged in December 2017 for the Phase 2 residential development, consisting 4 No. blocks of apartments (Blocks E, F, G and H) ranging in height from 3 / 4 storey to 6 storey over basement comprising 69 No. units and the provision of 20 No. house units. The Phase 2 development as granted comprises 20 No. dwelling houses, the refurbished Coach House and west Gate Lodge, 2 no. apartments and a creche and community / leisure uses located within Cedar Mount, and some 57 no. apartments located within 3 no. blocks.

An application was made to An Bord Pleanála under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016, on the 29th day of October 2021 for an SHD comprising 227 No. apartment units. This application was granted by ABP on 8th March 2022, but was ultimately quashed following a judicial review, and has now been remitted back to the Board for further consideration. The current application represents the revised Knockrabo lands phase 2 application.

The subject site is zoned Objective A (Residential), the objective of which is *“to provide residential development and improve residential amenity while protecting the existing residential amenities”*.

‘Residential’, ‘Childcare Services’ and ‘Community’ uses are permitted under the Land Use Matrix under the Objective A Zoning.

From the above review, it is considered that the site is located within an urban area and is subject to a land use zoning objective under the Development Plan which supports residential led mixed use development.



3.0 LEGISLATIVE BASIS FOR EIA

3.1 EIA Directive

EIA requirements are governed by Directive 2014/52/EU (referred to as the 2014 Directive), which amends the previous Directive (Directive 2011/92/EU). The primary objective of the EIA Directive is to ensure that projects that are likely to have significant effects on the environment are subjected to an assessment of their likely impacts.

The requirements of the EIA Directive have been transposed into Irish planning consent procedures in Part X of the Acts and subsequently by the *European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018)*, which came into effect from 1st September 2018.

This EIA Screening Assessment has also been prepared with reference to the EPA's *Guidelines for Planning Authorities* and *An Bord Pleanála* on carrying out Environmental Impact Assessment, August 2018¹, *OPR Practice Note PN02, Environmental Impact Assessment Screening, June 2021*² and the EPA's *Guidelines on the information to be contained in Environmental Impact Assessment Reports, May 2022*³.

3.2 The Acts and Regulations

Section 172(1) of the Acts sets out the following requirement for EIA:

"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

¹ <https://www.gov.ie/en/publication/53aee9-guidelines-for-planning-authorities-and-an-bord-pleanala-on-carrying/>

² <https://www.opr.ie/planning-practice/>

³ https://www.epa.ie/publications/monitoring--assessment/assessment/EIAR_Guidelines_2022_Web.pdf



specified in that Part, or

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

or

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

does not equal or exceed as the case may be, the relevant quantity, area or other limit specified in that Part, an(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.”



Schedule 5, Part 1

Part 1 of Schedule 5 includes a list of 24 classes where a mandatory EIA is required if the applicable development exceeds the identified limits within the class.

Schedule 5, Part 2

The Project has been considered against the categories of development contained within Part 2 of Schedule 5.

Part 2 - Class 10(b)(i) – Infrastructure Projects

- (b) (i) *“Construction of more than 500 dwelling units.”*

Part 2 - Class 10(b)(iv) – Infrastructure Projects

- (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 Project has been considered against the categories of development contained within Part 1 of Schedule 5 and does not reasonably fall within any of the defined classes. Therefore, a mandatory EIAR is not required.

The proposed development consists of 158 No. residential units and is therefore significantly below the 500 No. unit threshold. The project relates to a site area of 2.54 hectares. The site is not located within a business district and is significantly below the threshold of 10 hectares for a built-up area. Given the above, a mandatory EIAR is not required.

EIA is therefore not required in respect of this Class and threshold.

Part 2 – Class 13(a) – Changes, extensions, development and testing

“(a) Any change or extension of development already authorised, executed or in the process of being executed (not being a change or extension referred to in Part 1) which would:-

- (i) *result in the development being of a class listed in Part 1 or paragraphs 1 to 12 of Part 2 of this Schedule, and*
(ii) *(ii) result in an increase in size greater than – - 25 per cent, or - an amount equal to 50 per cent of the appropriate threshold, whichever is the greater.”*

An EIA was not previously carried out for ABP Ref. ABP-311826-21 by An Bord Pleanála given that the proposed development was sub-threshold (i.e. less than 500 no. units on a site less than 10ha in a built-up area) and it was considered that the proposal would not be likely to have significant effects on the environment based on the information submitted. We note



that this SHD permission has been quashed in the High Court, however. The changes covered by the proposed scheme will not result in the affected area being of a class listed in Part 1 of this Schedule 5. The site area for the SHD permission was 1.78 ha and we note the subject site area for the subject LRD application is now 2.54 ha, although we note that LRD application is a new application which does not seek to amend any previous application at the subject site.

EIA is therefore not required in respect of this Class and threshold.

Part 2 - Class 15

Class 15 sets out the following:

“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 such, EIA will be required for Projects which are listed in Part 2 of Schedule 5 which do not meet or exceed the thresholds or limits defined but which are considered likely to have significant effects on the environment, having regard to the criteria identified in Schedule 7 of the *Regulations*.

Article 92 of the *Regulations* defines “sub-threshold development” as follows:

“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.”

In this instance, the Project may be considered to fall within Class 10 (b) (i) or (iv) of Part 2 of Schedule 5, as the application includes development of residential units or urban development in other parts of a built-up area but is less than the 10 hectare threshold specified above. This is considered to constitute sub-threshold development.

A Screening Assessment in accordance with Schedule 7 of the *Regulations* has been undertaken for the purposes of providing all necessary information to DLRCC as the competent authority. The assessment under Schedule 7 confirms that the Project is not likely to have significant effects on the environment.

EIA is therefore not required in respect of Class 10, having regard to Schedule 7 of the *Regulations*.

3.3 Article 44A (1) of the Regulations

Article 44A (1) of the *Regulations* sets out the information requirement for deciding if an application to extend or extend further the appropriate period requires environmental impact assessment. In this regard it is stated:

“Where an applicant is submitting to the planning authority the information specified in Schedule 7A, the information shall be accompanied by any further



relevant information on the characteristics of the proposed extension of the appropriate period and its likely significant effects on the environment, including, where relevant, information on how the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive have been taken into account.”

The information specified in Schedule 7A is addressed below and includes relevant information on the characteristics of the proposed extension and its likely significant effects on the environment.

This following section details the other preliminary assessments (Non EIA Directive) and EU Directives relevant to the proposed development and the results for the purposes of EIA screening, which have been taken into account.

3.3.1 DIRECTIVE 92/43/EEC, THE HABITATS DIRECTIVE & BIRDS DIRECTIVE (DIRECTIVE 2009/147/EC On The Conservation Of Wild Birds)

The European Communities (Birds and Natural Habitats Regulations 2011) (S. I. No. 477 of 2011) transpose the Habitats Directive and the Birds Directive. The 2011 Regulations were amended by:

- S.I. No. 290 of 2013
- S.I. No. 499 of 2013
- S.I. No. 355 of 2015
- Planning, Heritage and Broadcasting (Amendment) Act 2021 (no.11 of 2021), Chapter 4
- S.I. No. 293 of 2021

Appropriate Assessment Screening (AA)

The application for the proposed development includes an Appropriate Assessment Screening (AA), which concludes that:

“Given the minimum distance from the proposed development site to European sites at Dublin Bay, and the fact that foul will be treated at Ringsend WwTP via the foul sewer network, any pollutants, dust or silt laden run off will be dispersed, diluted, and ultimately treated within the public network prior to reaching the marine environment. In the absence of mitigation, no significant effects on European sites are likely. No specific mitigation is required to prevent impacts on European sites.

Having taken into consideration foul and surface water drainage from the proposed development, the distance between the proposed development to designated conservation sites, lack of direct hydrological pathway or biodiversity corridor link to conservation sites, and the dilution effect with other effluent and surface runoff, it is concluded that there is no potential for significant effect on any European Sites in light of their conservation objectives.”



The AA prepared by Altemar, also notes;

“This report aims to gather baseline data and to assist in assessing the potential impacts on wintering birds from future proposed developments on the grounds, particularly those listed as Qualifying Interests of SPAs within 15 km and other amber/red-listed birds of conservation concern in Ireland (BoCCI). 6 surveys by Frank Spellman and 2 surveys by Emma Peters during the wintering bird season from November 2023 to March 2024.

A total of 30 species of birds were recorded within and above the survey areas across 8 surveys. Twenty two green, 6 amber and 2 red species of conservation concern were recorded either within, over or immediately adjacent to the survey area boundary. Herring Gull, Black-headed Gull and Common Gull were species listed as Qualifying Interests of designated sites within 15 km of Knockrabo. Sightings of these species during surveys almost entirely consisted of flights. Only one foraging sighting of these species (individual Herring Gull) was recorded within the survey area. Two red-listed species were only recorded during one survey each. Other amber-listed species were recorded on no more than two occasions each.

The proposed development is not predicted to have a significant impact on wintering bird species. The impact would be considered to be minor adverse, not significant, long term and permanent.”

3.3.2 DIRECTIVE 2007/60/EC, FLOODS DIRECTIVE

Flood Risk Assessment

As outlined in the Site-Specific Flood Risk Assessment provided by Waterman Moylan Consulting Engineers;

“the various sources of flooding have been reviewed, and the risk of flooding from each source has been assessed. Where necessary, mitigation measures have been proposed. As a result of the proposed mitigation measures, the residual risk of flooding from any source is low.”

We note that the Residual risk for the sources assessed either negligible, extremely low, or low.

3.3.3 DIRECTIVE 2002/49/EC, ENVIRONMENTAL NOISE DIRECTIVE

Management Plans

A Construction Management Plan (including Resource and Waste Management Plan, as well as an assessment of environmental effects) has been prepared by Waterman Moylan Consulting Engineers to accompany this application. An Operational Waste Management Plan and Resource and Waste Management Plan have been prepared by AWN Consulting. A Noise and Vibration Assessment has also been prepared by AWN Consulting. The Noise and



Vibration Assessment describes the measures that have been put in place in relation to Noise and Vibration.

The Noise Review concludes;

“ Furthermore, vibration impacts on the proposed development have been assessed both during the construction and operational phase of the DEBP road scheme. During construction it is concluded that there will be no adverse impact on the development structures, once the appropriate limits are adhered to by the relevant contractors. During operation of the DEBP it is concluded that the proper maintenance of the road surface on the DEBP will ensure that traffic induced vibration by road traffic, including heavy goods vehicles, is unlikely to be generated at a magnitude that would be subjectively noticeable within the proposed development buildings. Furthermore, any vibration generated during the operation of the DEBP would be far below the level at which any damage would be caused to the development buildings.

During the construction phase of the proposed development itself project there will be a short-term increase in noise levels particularly during the early stage phases of work. Noise mitigation measures will be employed at the site to control site noise emissions as far as practicable. Overall, the impact is moderate and short-term impact with temporary significant effects during the construction phase.

Once operational, there are no significant noise impacts associated with the development itself on its surrounding environment.”

Under the heading 2.8.3 Noise and Vibration Mitigating Measures, the Outline Resource and Waste Management Plan report states:

“With regard to construction activities, reference will be made to BS5228 Parts 1 and 2, which offer detailed guidance on the control of noise and vibration from demolition and construction activities. Various mitigation measures will be considered and applied during the construction of the proposed development. Specific examples of such measures are:

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

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



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

3.3.4 DIRECTIVE 2001/42/ EC, SEA DIRECTIVE

A Strategic Environmental Assessment (SEA) Environmental Report has been prepared for the *Development Plan*. The Plan sets out an overall strategy for the proper planning and sustainable development of the functional area of DLRCC for the period 2022-2028.

Reports in the current submission that are relevant to this Directive include this Environmental Impact Assessment Screening Report and the Planning Report (enclosed separately) also prepared by this office. Other reports that are relevant to this directive and which are submitted with this planning application include the *Design Statement prepared* by OMP Architects and *Engineering Planning Report* prepared by Waterman Moylan Consulting Engineers.

The Development Plan was consulted throughout the process of the design and preparation of assessment reports for the proposed development. Both the current and previous development plans have been informed by the relevant SEA Environmental Reports. As a result, no further assessment in relation to DIRECTIVE 2001/42/ EC, SEA DIRECTIVE is required.

3.3.5 DIRECTIVE 2008/98/EC WASTE FRAMEWORK DIRECTIVE & DIRECTIVE 1999/31/EC LANDFILL DIRECTIVE

To comply with the legal framework for the classification of waste, the Waste Producer is required to identify if the waste is either hazardous or non-hazardous in nature. This has been transcribed into Irish law under S.I. No.126/2011 – European Communities (Waste Directive) Regulations 2011.

Furthermore, to comply with the Landfill Directive (Council Decision of 19th December 2002) establishing criteria and procedures for the acceptance of waste at landfills pursuant to Article 16 of and Annex II to Directive 1999/31/EC (2003/33/EC) the Waste Producer must determine whether the waste is suitable for either inert, non-hazardous or hazardous landfill facilities.

Both the waste framework and landfill directive have been taken into account in the preparation of the RWMP which was prepared by AWN Consulting and submitted with this LRD application.

The Resource and Waste Management Plan (RWMP) includes information on the legal and policy framework for C&D waste management in Ireland, estimates of the type and quantity of C&D waste to be generated by the LRD and makes recommendations for management of different waste streams.

Further to the above, it is noted that the RWMP states the following:



“Waste materials generated will be segregated on-site, where it is practical. Where the on-site segregation of certain wastes types is not practical, off-site segregation will be carried out. There will be skips and receptacles provided to facilitate segregation at source, where feasible. All waste receptacles leaving the site will be covered or enclosed. The appointed waste contractor will collect and transfer the wastes as receptacles are filled. There are numerous waste contractors in the Dublin region that provide this service.

All waste arisings will be handled by an approved waste contractor holding a current waste collection permit. All waste arisings requiring disposal off-site will be reused, recycled, recovered or disposed of at a facility holding the appropriate registration, permit or licence, as required.

National End-of-Waste Decision EoW-N001/2023 (Regulation 28) establishes criteria determining when recycled aggregate resulting from a recovery operation ceases to be waste. Material from this proposed development will be investigated to see if it can cease to be a waste under the requirements of the National End of Waste Criteria for Aggregates.

During construction, some of the sub-contractors on site will generate waste in relatively low quantities. The transportation of non-hazardous waste by persons who are not directly involved with the waste business, at weights less than or equal to 2 tonnes, and in vehicles not designed for the carriage of waste, are exempt from the requirement to have a waste collection permit (per Article 30 (1) (b) of the Waste Collection Permit Regulations 2007, as amended). Any sub-contractors engaged that do not generate more than 2 tonnes of waste at any one time can transport this waste off-site in their work vehicles (which are not designed for the carriage of waste). However, they are required to ensure that the receiving facility has the appropriate COR / permit / licence.

Written records will be maintained by the contractor(s), detailing the waste arising throughout the C&D phases, the classification of each waste type, waste collection permits for all waste contractors who collect waste from the site and COR / permit / licence for the receiving waste facility for all waste removed off-site for appropriate reuse, recycling, recovery and / or disposal

Dedicated bunded storage containers will be provided for hazardous wastes which may arise, such as batteries, paints, oils, chemicals, if required.”

An Operational Waste Management Plan prepared by AWN has been submitted, and states the following:

“this OWMP presents a waste strategy that addresses all legal requirements, waste policies and best practice guidelines and demonstrates that the required storage areas have been incorporated into the design of the proposed Development.

Implementation of this 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 and the NWMPCE 2024 – 2030.



Adherence to this plan will also ensure that waste management at the development is carried out in accordance with the requirements outlined in the DLRCC Guidance Notes for Waste Management Planning for Residential and Commercial Developments and the DLRCC Waste Bye-Laws.

The waste strategy presented in this document will provide sufficient storage capacity for the estimated quantity of segregated waste. The designated areas for waste storage will provide sufficient room for the required receptacles in accordance with the details of this strategy.”

3.3.6 SEVESO III DIRECTIVE (2012/110/EU)

Section 10.4.4 Policy Objective EI17: ‘Major Accidents’ of the DLRCC Plan states that;

“It is a Policy Objective to have regard to the provisions of the Major Accidents Directive (European Council Directive 2012/110/ EU). This Directive relates to the control of major accident hazards involving dangerous substances and its objectives are to prevent major accidents and limit the consequences of such accidents.”

There are two tiers of Seveso/COMAH sites, relating to the quantities of dangerous substances present.

There are no COMAH sites (defined within the Control of Major Accident Hazards Regulations as “locations where significant quantities of dangerous substances are stored”) within 500 metres of the subject site, nor are there any COMAH sites within 5km of the subject site. The DLRCC Development Plan notes that there are no COMAH sites within DLRCC.



3.4 Schedule 7 of the Regulations

Schedule 7A of the *Regulations* sets out the following information to be provided, for the purposes of screening sub-threshold development for EIA by the planning authority:

- “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.”*

Competent/Consent authorities must have regard to these criteria in forming an opinion as to whether or not a sub-threshold development is likely to have significant effects on the environment by virtue of, inter alia, of their nature, size or location and should be subject to EIA. The key issue is:

‘Are the likely effects significant?’

In order to provide the Planning Authority with all requisite information for a screening determination, the information required in Schedule 7A is detailed in Section 3.3.1 below. This is based on the criteria in Schedule 7 as referenced under Part (4) of Schedule 7A.



3.4.1 Assessment under Schedule 7 of the *Regulations*

	Criteria for Determining whether development listed in Part 2 Schedule 5 should be subject to EIA	Are the likely effects significant?	Yes / No
1	Characteristics of proposed development <i>The characteristics of proposed development, in particular—</i>		
(a)	<i>the size and design of the whole of the proposed development,</i>	<p>This project relates to the application for the development of 158 No. residential units and associated infrastructure on a site area of c.2.54 hectares.</p> <p>There are no apparent characteristics or elements of the design of the scheme that are likely to cause significant effects on the environment. The project works are suitably detailed on the plans prepared by OMP Architects and submitted with the application for planning permission and includes the following at the time of submission;</p> <p>Proposed Development: <i>“Knockrabo Investments DAC intend to apply for permission for a Large-scale Residential Development (for a period of 7 years) with a total application site area of c. 2.54 hectares, at Knockrabo, Mount Anville Road, Goatstown, Dublin 14. The proposed development relates to Phase 2 of the development on the ‘Knockrabo’ lands. Phase 1 of ‘Knockrabo’ was granted under Dún Laoghaire-Rathdown County Council (DLRCC) Reg. Ref. D13A/0689/An Bord Pleanála (ABP) Ref. PL06D.243799 and DLRCC Reg. Ref. D16A/0821 (Phase 1) and DLRCC Reg. Ref. D16A/0960 (Phase 1A) and comprises a total of 119 No. units.</i></p> <p><i>The site is bounded to the south-east by Mount Anville Road; to the south by ‘Mount Anville Lodge’ and by the rear boundaries of ‘Thendara’ (a Protected Structure – RPS Ref. 812), ‘The Garth’ (a Protected Structure – RPS Ref. 819), ‘Chimes’, ‘Hollywood House’ (a Protected Structure – RPS Ref. 829); to the south-west by existing allotments; to the north by the reservation corridor for the Dublin Eastern By-Pass (DEBP); and to the east by the site of residential development ‘Knockrabo’ (Phase 1, permitted under DLRCC Reg. Ref. D13A/0689 / An Bord Pleanála (ABP) Ref. PL.06D.243799 and DLRCC Reg. Ref. D16A/0821 (Phase 1); and DLRCC Reg. Ref. D16A/0960 (Phase 1A)). The site includes ‘Cedar Mount’ (a Protected Structure- RPS Ref. 783), ‘Knockrabo Gate Lodge (West)’ (a Protected Structure RPS Ref. 796), including Entrance Gates and Piers.</i></p> <p><i>The development with total of c.17,312.2 sq.m. gross internal area (GIA) will consist of the construction of 158 No. residential units (12 No. houses and 146 No. apartments (35 No. 1 beds, 81 No. 2 beds, 3 No. 3 beds and</i></p>	No



		<p>27 No. 3 bed duplex units), a childcare facility (c.400 sq.m. GIA) and Community / Leisure Uses (c. 223 sq.m. GIA), as follows:</p> <ul style="list-style-type: none"> • Block E (c.1,077 sq.m. GIA): a 5-storey including semi-basement podium level apartment block, comprising 8 No. apartments (1 No. 1 bed and 7 No. 2 beds); • Block F: (c.8,390.8 sq.m. GIA): a part 2 to part 8 storeys including semi basement podium apartment block, comprising 84 No. units (31 No. 1 beds, 50 No. 2 beds and 3 No. 3 bed duplex units); • Block G: (c.2,022.1 sqm GIA): a part 4 to part 5-storey apartment block, comprising 20 No. units (3 No. 1 bed units, 14 No. 2 bed units and 3 No. 3 bed units); (with sedum roof/PV panels at roof level of Blocks E, F and G; a communal Roof Terrace of c. 198 sqm on Block F; and balconies/wintergardens on all elevations of Blocks E, F and G); • Duplex Blocks: (c. 3,292.6 sqm GIA): 1 No. 3 storey and 1 No. 4 storey block, comprising a total of 32 No. units (8 No. 2 bed units and 24 No. 3 bed duplex units); • 10 No. (new build) houses: 6 No. 4 bed 2.5-3 storey terraced/semi-detached units (ranging in size from c.162.1 sqm GIA to c.174.2 sq.m. GIA); 1 No. 3 bed 2 storey detached unit (126.2 sq.m. GIA); 1 No. 3 bed 2 storey mid terrace unit (c.129.2 sq.m. GIA); 1 No. 3 bed 2 storey end of terrace unit (c.129.2 sq.m. GIA); and 1 No. 1 - 2 storey 'Gate House' (c. 122.6 sq.m. GIA) to the west of proposed repositioned entrance to Cedar Mount from Mount Anville Road; • The use of existing 'Coach House' as a residential dwelling and for internal / external repair / refurbishment works at ground and first floor levels, including the removal of 3 No. roof lights, 1 No. metal clad dormer roof window and external water tank; the construction of 2 No. single storey flat roof extensions (c.35.5 sq.m. GIA), revisions to the external facade including the addition of 1 No. new window ope on the south facade and rendered finish to all original facades, solar panels at roof level; removal / re-use of stone to form new garden wall; to provide 1 No. 2 bed house (c. 99.5 sq.m. GIA) with refurbished stone shed (c. 13.9 sq.m. for storage GIA). • The use of Knockrabo Gate Lodge (West) (a Protected Structure) as a residential dwelling; and for repair / refurbishment works including demolition of existing section of extension on top of stone boundary wall; removal of 1 No. roof light and 1 No. internal partition wall; construction of replacement extension (c.77.5 sq.m. GIA) to provide 1 No. 3-bed unit (c. 128 sq.m. GIA) with solar panels at roof level, bin storage, landscaping, all repair works to the existing Gate and Piers, and all associated internal and external elevational changes. • The proposed development comprises works to Cedar Mount (a Protected Structure) to provide: 1 No. Childcare Facility at Lower Ground Floor level (c.400 sq.m. GIA) with associated external play and bin storage areas; Community / Leisure Uses at Ground Floor Level (c. 223 sq.m. GIA), comprising Gym / Studio (c.35.6 sq.m. GIA), Library / Office (c. 35.9 sq.m. GIA), Meeting room 	
--	--	---	--



		<p>(c.28.4 sq.m. GIA) and Conservatory room (c. 21.6 sq.m. GIA); and 2 No. 2 bed apartments at 1st floor level, (c.77.6 sq.m. GIA and c.88.2 sq.m. GFA). The works to Cedar Mount to consist of:</p> <ul style="list-style-type: none"> ○ At lower ground floor/ basement level, the removal of internal walls and sections of external and internal walls and access doors; insertion of openings through external and internal walls; removal of internal staircase to ground floor level; repair of existing “loggia” (covered external corridor) on northern, north-western and north-eastern facades, with revised elevations comprising glazed panels / glazed entrance doors located within loggia opes; the additional area (c. 58 sq.m. GIA) to form part of proposed Childcare Facility; ○ At ground floor level removal of wooden staircase to 1st floor level and replacement with open-tread staircase, and construction of conservatory room (c. 21.6 sqm GIA) with flat roof on south - western side of Cedar Mount with sedum roof; removal of 1 No. WC; ○ At 1st floor level removal of sections of internal walls; insertion of doors through internal walls; ○ Re-instatement of 1 no. new chimney stack on the western end of the existing roof; replacement of rubble masonry finish with lime and sand plaster finish on all elevations relating to sections of original façade; removal of security bars from existing windows in front porch; replacement / reconfiguration of rainwater downpipes, hopper heads and associated roof outlets; Re-modelling of extension on northern side including replacement of timber / pressed metal cladding with brick / zinc cladding and glazing at ground and 1st floor levels, removal / replacement of external doors and windows; replacement of flat roof deck, parapet, eaves and roof-light with flat roof comprising brick / zinc clad parapet and removal of internal link at 1st floor level; repair works to external walls at ground floor level; Construction of rendered blockwork wall and steel handrail to terrace and associated repair works to section of existing parapet wall on eastern side of Cedar Mount; all hard and soft landscaping; revisions to garden wall and pillars on western side of Cedar Mount; and all associated internal and elevational changes; and ○ The repositioning of existing access (including gates and piers) to Cedar Mount (a Protected Structure) on Mount Anville Road to the northeast with associated works to boundary wall to Mount Anville Road. <p>The development will also provide 130 No. car parking spaces consisting of 117 No. residential spaces (comprising 54 No. at podium level, 63 No. on-street and on curtilage spaces, 6 No. visitor spaces and 2 No. on-street car sharing spaces); and 5 No. non-residential spaces; provision of 366 No. bicycle parking spaces (consisting of: 288 No. residential spaces, 70 No. (residential) visitor spaces, 6 No. (non-residential) spaces and 2 No. visitor (non-residential) spaces); and 9 No. motorcycle parking spaces.</p> <p>All other ancillary site development works to facilitate construction, site services, piped infrastructure, 1 No. sub-station, plant, public lighting, bin stores, bike stores, boundary treatments, provision of public, communal</p>	
--	--	---	--



		<p><i>and private open space areas comprising hard and soft landscaping, site services all other associated site excavation, infrastructural and site development works above and below ground. In addition to the repositioned access to Cedar Mount (a Protected Structure) as referenced above, the development will be served by the permitted access road 'Knockrabo Way' (DLRCC Reg. Ref. D13A/0689; ABP Ref. PL.06D.243799, DLRCC Reg. Ref. D16A/0821 and DLRCC Reg. Ref. D16A/0960). The application does not impact on the future access to the Reservation for the Dublin Eastern Bypass.</i></p> <p><i>The planning application may be inspected online at the following website: www.knockrabolrd.ie. The planning application may be inspected or purchased at a fee not exceeding the reasonable cost of making a copy, at the offices of Dún Laoghaire-Rathdown County Council, Marine Road, Dún Laoghaire, Co. Dublin, during its public opening hours of Monday to Friday from 10:00am to 4:00pm. A submission or observation in relation to the application may be made in writing to the planning authority on payment of the prescribed fee (€20.00) within the period of 5 weeks beginning on the date of receipt by the authority of the application, and such submissions or observations will be considered by the planning authority in making a decision on the application. The planning authority may grant permission subject to or without conditions, or may refuse to grant permission."</i></p> <p>Expected Timeframe for Development Proposed development to be constructed in 1 No. phase and to last approximately 24 months (<i>Construction Management Plan</i> prepared by WM refers).</p> <p>In the context of the surrounding area and its developed nature, it is considered that the likely effects from the size and scale of this project are not significant. The proposed development is being constructed on a brownfield site with limited environmental sensitivity. As such, the likely effects from the size and scale of the project are considered to not be significant.</p>	
(b)	<p><i>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,</i></p>	<p>A search of the DLRCC and ABP planning application databases has been carried out to identify any recent existing or approved projects in the site area. Selected projects represent approved SHD or LRD schemes.</p> <p>There are several development proposals located in the areas surrounding the subject site and within the potential Zone of Influence (Zoi). These have been assessed for potential cumulative effects. The following is a list of relevant planning application(s):</p>	No



DLRCC Reg. Ref. / ABP Ref. No.	Address	Proposal
ABP 313176	Lands at the Central Mental Hospital, Dundrum Road, Dundrum, Dublin 14.	Demolition of existing structures, 10-year permission for the construction of 977 no. residential units (20 no. houses, 957 no. apartments), creche and associated site works.
JA06D.320912	Lands at the Central Mental Hospital, Dundrum Road, Dundrum, Dublin 14.	Demolition of existing structures and permission for the construction of 934 No. residential units, creche, restaurant, community centre and associated site works.
ABP TA0001	University College Dublin, Belfield, Dublin 4.	10 year permission for 512 student accommodation units (3006 no. bed spaces) including student facility centre, car parking and all associated site works.
D16A/0818 / ABP 248265	Greenacres, Kilmacud Road Upper, Dublin 14.	Demolition of the former Green Acres Convent and the construction of 120 no. apartments in 2 blocks ranging in height from 2 to 5 storeys with all associated site works.
ABP 304469	Greenacres, Longacre and Drumahill House, Upper Kilmacud Road, Dundrum, Dublin 14.	253 no. apartments and associated works. (Amended by ABP 307683 to add 54 no. additional apartments).
ABP 312170	Marmalade Lane, Wyckham Avenue, Dundrum, Dublin 16.	531 no. Build to Rent apartments, creche and associated site works.
ABP 304405	Rockbrook, Carmanhall Road, Sandyford Business District, Sandyford, Dublin 18.	428 no. apartments, creche, 4 no. local/neighbourhood retail units and associated site works.
ABP 305940	Former Aldi Site, Carmanhall Road, Sandyford Business District, Dublin 18.	Demolition of existing structures on site and construction of 564 no. build to rent apartments, creche and associated site works.
ABP 311722	Former Siemens Site, Corner of Blackthorn Avenue and Ballymoss Road, Sandyford Industrial Estate, Dublin 18.	Demolition of the existing building on site, construction of 190 no. Build to Rent apartments and associated site works.
ABP 310138	Mount Saint Mary's and Saint Joseph's, Dundrum Road, Dundrum, Dublin 14.	Demolition of existing buildings on site and part of the granite wall along Dundrum Road, excluding Small Hall, construction of 231 no. apartments, childcare facility and associated site works.



		<p>The above developments have been assessed for cumulative effects. Following this assessment, it is considered that in combination effects with other existing and proposed developments in proximity to the application area would be unlikely, neutral, not significant and localised. Any impacts due to the overlap of the construction phases of these or other projects in the site area will be short term and construction will be carried out in accordance with health and safety standards. The site is located within an established suburban area where a number of construction projects and ongoing activity at any given time is normal. Taking into account the location of the development, it is not considered likely that it would result in cumulative environmental impacts with other existing and/ or approved plans or projects.</p> <p>The overarching policies and objectives of the DLRCC Plan would ensure that local planning applications and subsequent grants of planning permission comply with the proper planning and sustainable development of the area. It is reasonable to assume that all development consents would incorporate conditions requiring protection of the environment during the construction phase of development. As such, the likely effects from the cumulation with other existing development and/or development the subject of a consent for proposed development are considered to not be significant.</p>	
(c)	<i>the nature of any associated demolition works,</i>	<p>Minor demolition of non-original elements of Cedar Mount House and the Gate Lodge are proposed as part of the development. All existing protected structures (those being the Gate Lodge and Cedar Mount – exclusive of non-original features) are to be retained and sensitively refurbished as part of the proposed development. Refer to the architectural pack and design statement prepared by OMP Architects, and Architectural/Historic Significance and Impact Report prepared by Slattery Conservation for further information. As such, the likely effects associated with proposed demolition works for the project are considered to not be significant.</p>	No
(d)	<i>the use of natural resources, in particular land, soil, water and biodiversity,</i>	<p>The Project will use land and construction materials.</p> <p>No significant effects on the environment are anticipated as a result of materials used in the construction process. We note a number of materials are proposed for re-use on site, with those primarily being related to the re-use of materials associated with the existing structures, including the gates and piers fronting Mount Anville Road.</p> <p>As such, the likely effects from the use of natural resources are considered to not be significant.</p>	No
(e)	<i>the production of waste,</i>	<p>Waste will be generated during the construction phase.</p> <p>It will be disposed of using licensed waste disposal facilities and contractors. The scale of the waste production in conjunction with the use of licensed waste disposal facilities and contractors does not cause concern for likely significant effects on the environment. The application includes a Construction Management Plan prepared by Waterman Moylan Consulting Engineers, and a Resource and Waste Management Plan and Operational Waste Management Plan prepared by AWN Consulting which assesses construction and operational waste generated by the proposed development. These reports outline the management of construction waste.</p>	No



		Operational waste from the commercial and residential elements will be disposed of by an approved licensed waste disposal contractor. The Management Company will address waste management in communal areas. As such, the likely effects from the production of waste associated with the proposed development are considered to not be significant.	
(f)	<i>pollution and nuisances,</i>	<p>During the construction and operational phases the Project will have the potential to generate pollution or potential nuisance associated with Air, Noise and Traffic.</p> <p>During the construction and operational phases, these activities will be carefully controlled through on site management and fully in accordance with the submitted Construction Management Plan and Resource and Waste Management Plan.</p> <p>As such, the likely effects from potential pollution and nuisances associated with the proposed development are considered to not be significant.</p>	No
(g)	<i>the risk of major accidents, and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge, and</i>	<p>During the construction stage there is potential for accidents that could affect human health or the environment. Specific controls have been put in place to manage risks in line with HSA requirements.</p> <p>The risk of accidents associated with the proposed development would not cause unusual, significant or adverse effects of a type that would individually or cumulatively require EIA.</p> <p>Standard construction practices will be employed throughout the construction phase. There are no technologies or substances to be used in the development which may cause concern for having likely significant effects on the environment.</p> <p>The subject lands are zoned under the Development Plan and as such have been subject to a Strategic Flood Risk Assessment. A Flood Risk Assessment prepared by Waterman Moylan Consulting Engineers included with the application has not highlighted cause for concern in terms of flooding allowing for climate change.</p> <p>As such, the likely effects the potential risk of major accidents, and/or disasters associated with the proposed development are considered to not be significant.</p>	No
(h)	<i>the risks to human health (for example, due to water contamination or air pollution).</i>	<p>During the construction stage there is a potential for polluting matter to enter onto land, water and ground water.</p> <p>Standard preventative measures are provided as part of the project, which will be carried out in accordance with best practice and specific controls will be put in place to manage risks. These measures are captured in the Construction Management Plan and Resource and Waste Management Plan.</p> <p>It is noted that the measures included are best practice and have not been included to avoid or reduce harmful effects</p>	No



		on any European site. As such, the likely effects of potential risks to human health associated with the proposed development are considered to not be significant.	
--	--	---	--

2	Location of proposed development <i>The environmental sensitivity of geographical areas likely to be affected by the proposed development, with particular regard to—</i>		
(a)	<i>the existing and approved land use,</i>	The site, of 2.54 hectares, is located at Knockrabo, Mount Anville Road, Goatstown, Dublin 14. The site and is subject to Zoning Objective A ‘Residential’ under the Development Plan. The objective seeks “to provide residential development and improve residential amenity while protecting the existing residential amenities.” ‘Residential’, ‘Childcare Services’ and ‘Community’ uses are permitted under the Land Use Matrix under the Objective A Zoning. As such, the likely effects on the existing and approved land use from the proposed development are considered to not be significant.	No
(b)	<i>the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground,</i>	Thus is an infill suburban site, which is subject to a zoning objective to provide residential development, having regard to the proximity of the site to public transport services. The site is c.2.7km from the nearest SAC/SPAs, being the South Dublin Bay and River Tolka Estuary SPA. The inclusion of SuDs measures, extensive planting and retention of a significant quantum of existing mature trees will be of benefit for the site and environs. As such, the likely effects on natural resources (in the area and underground) from the proposed development are considered to not be significant.	No
(c)	<i>the absorption capacity of the natural environment, paying particular attention to the following areas:</i> <i>(i) wetlands, riparian areas, river mouths;</i> <i>(ii) coastal zones and the marine environment;</i> <i>(iii) mountain and forest areas;</i> <i>(iv) nature reserves and parks</i>	Wetlands, Riparian Areas and River Mouths The proposed development is not within or directly connected to wetlands, riparian areas or river mouths. There is no known pathway between the site and these areas. Coastal Zones and the Marine Environment There is an indirect hydrological pathway from the proposed development site via foul and surface water drainage to the European sites located within Dublin Bay. The AA notes that pollution to marine waters are not a sufficient threat given the minimum distance from the proposed development site to European sites at Dublin Bay, and the fact that foul will be treated at Ringsend WwTP via the foul sewer network, any pollutants, dust or silt laden run off will be dispersed, diluted, and ultimately treated within the public network prior to reaching the marine environment.	No



<p>(v) <i>areas classified or protected legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive and;</i></p> <p>(vi) <i>areas in which there has already been a failure to meet the environmental quality standards laid down in legislation of the European Union and relevant to the project, or in which it is considered that there is such a failure;</i></p> <p>(vii) <i>densely populated areas; landscapes and sites of historical, cultural or archaeological significance.</i></p>	<p>Mountain and forest areas The proposed development is not within or directly connected to any mountain or forest areas. There is no known pathway between the site and mountain or forest areas.</p> <p>Nature reserves and parks The proposed development is not within or directly connected to any nature reserves or parks. There is no known pathway between the site and nature reserves or parks.</p> <p>Areas classified or protected under national legislation, including Natura 2000 areas designated pursuant to Directives 79/409/EEC and 92/43/EEC The closest Natura 2000 sites are located c.2.7km from the subject site. The AA Screening prepared by Altemar concludes that the proposed development will not have any significant effects on the integrity of any European site(s).</p> <p>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 The site is not known to be located within or connected to such an area.</p> <p>Densely populated areas The proposed development is located within a densely populated area. The development of this site will provide a residential scheme on a valuable land resource. The site is subject to 'A' Zoning objective which facilitates and supports the proposed development. Therefore, there are no anticipated likely significant effects on the environment in relation to the geographic location of densely populated areas.</p> <p>Landscapes and sites of historical, cultural or archaeological significance. 2 No. protected structures are located within the subject lands. The Architectural/Historic Significance and Impact Report by Slattery Conservation Architects outlines that the proposed development is likely to have an imperceptible impact on adjoining structures not within the development site, and that the proposed development will enhance the Protected Structures within the site.</p> <p>An Archaeological Assessment has also been prepared by IAC in respect of the proposed development. The archaeological report submitted with the application confirms that the archaeological potential for the subject site is low and that potential for archaeological deposits to be uncovered as a result of development is low, with no archaeological features identified.</p> <p>Overall, the likely effects on the aforementioned areas from the proposed development are considered to not be significant.</p>	
---	---	--



3	<p>Types and characteristics of potential impacts The likely significant effects on the environment of proposed development in relation to criteria set out under paragraphs 1 and 2, with regard to the impact of the project on the factors specified in paragraph (b)(i)(I) to (V) of the definition of ‘environmental impact assessment report’ in section 171A of the Act, taking into account—</p>	
(a)	<p><i>the magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected),</i></p> <p>The Project relates to the development of land on a brownfield site, and the principal area of influence with respect to potential environmental impacts arising are primarily limited to the site and surrounding properties of a similar built-up nature.</p> <p>As previously outlined, there may be possible short-term nuisances to human beings from noise and pollution. These are not likely to be at such a quantity or of such a significance that would warrant the completion of a sub threshold EIAR. Noise and dust or pollution will be subject to standard mitigation measures as per typical construction projects.</p> <p>The proposed residential units which will become available upon completion will provide for a greater number of properties in the area and in the case of the proposed residential units, provide a high standard of living which will be beneficial for the wellbeing of the future inhabitants.</p> <p>There are no operational impacts that would be likely to cause significant effects on the environment in terms of population and human health.</p> <p>There are no nearby new sensitive receptors that would be likely affected by the proposed extension of duration.</p>	No
(b)	<p><i>the nature of the impact,</i></p> <p>The principal impact arising from the relevant development during construction and operational phases is traffic and visual impacts.</p> <p>During the construction phase, all potential impacts will be managed through careful on-site management through the Construction Management Plan and Resource and Waste Management Plan.</p> <p>With respect to the operational phase, the proposed development will have the surrounding road network will have little comparable impact on the current operational capacity of the surrounding road network of roads and junctions, as confirmed in the <i>Traffic and Transportation Assessment</i> prepared by Waterman Moylan and submitted with the application. The impact in this respect is considered to be negligible.</p>	No



(c)	<i>the transboundary nature of the impact,</i>	Given the nature and geographical extent of the potential impacts of the Project there is no scope for any cumulative trans-frontier impacts to occur.	No
(d)	<i>the intensity and complexity of the impact,</i>	The subject Project relates to physical works which would be considered expected within this context and will result in negligible impacts to the road network and visual environment. No significant impacts are likely to arise.	No
(e)	<i>the probability of the impact,</i>	The principal potential impacts arising relate to traffic and visual impacts. No significant impacts are likely to arise.	No
(f)	<i>the expected onset, duration, frequency and reversibility of the impact,</i>	The development works are being undertaken in accordance with the Construction Management Plan and Resource and Waste Management Plan as submitted for compliance with the conditions. The construction works are scheduled for completion 24 months after commencement of construction. The likelihood of significant impacts is low. The proposed development will form permanent works and cannot be reversed.	No
(g)	<i>the cumulation of the impact with the impact of other existing and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment, and</i>	The proposed development is located within proximity to any other existing and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment. In this context, the likelihood of significant impacts arising is low.	No
(h)	<i>the possibility of effectively reducing the impact.</i>	The principal impact arising relating to traffic impacts to the local road network is negligible. The likely visual impacts are also negligible. The construction phase will be undertaken in accordance with a Construction Management Plan and Resource and Waste Management Plan as submitted with this application. This will control all potential impacts arising from construction. This will therefore reduce the potential impact during the construction phase.	No

4.0 CONCLUSION

This EIA Screening Assessment confirms that the Project does not exceed a threshold specified in Part 1 of Schedule 5 of the Regulations, which requires the mandatory preparation of an EIA.

The relevant development may be considered to constitute sub-threshold development, i.e., is of a class specified in Part 2 of Schedule 5 of the Regulations, but does not equal or exceed the relevant quantity, area or other limit specified in that Class.

The screening assessment which has been undertaken in accordance with Schedule 7 and Schedule 7A of the Regulations has concluded that the works, individually and cumulatively, would not give rise to any significant effects on the environment, which would require the preparation of an EIA.

Yours faithfully,



Stephen Barrett
Director
Tom Phillips + Associates