



THORNTON O'CONNOR  
TOWN PLANNING

# Environmental Report

## Planning Application

In respect of a Shared Living Residential  
Development at

Brady's Public House  
Old Navan Road  
Dublin 15  
D15 W3FW

Submitted on Behalf of  
Bartra Property (Castleknock) Limited

September 2019



## TABLE OF CONTENTS

### 1.0 INTRODUCTION

### 2.0 DESCRIPTION OF SUBJECT SITE

2.1 Site Location and Description

2.2 Zoning Objective

### 3.0 DESCRIPTION OF PROPOSED DEVELOPMENT

### 4.0 EIA SCREENING METHODOLOGY

4.1 Legislation and Guidance

4.2 EIA Thresholds

4.3 Sub Threshold Projects Requiring EIA

4.4 EIA Screening Exercise

4.4.1 Characteristics of Proposed Development

4.4.2 Location of Proposed Development

4.4.3 Type and Characteristics of Potential Impacts

### 5.0 POSSIBLE EFFECTS ON THE ENVIRONMENT

5.1 Human

5.2 Biodiversity (Flora and Fauna)

5.3 Environmental Geography (Soil, Water, Air, Climatic Factors and the Landscape)

5.3.1 Soil

5.3.2 Water

5.3.3 Air Quality Pollution and Climate

5.3.4 Landscape

5.4 Material Assets (Architectural and Architectural Heritage, and the Cultural Heritage)

5.5 The Existence of the Proposed Development

5.6 The Use of Natural Resources

5.7 The Emission of Pollutants, the Creation of Nuisances and the Elimination of Waste

5.7.1 Traffic and Access

5.7.2 Noise

5.7.3 Waste

5.8 Analysis of Identified Impacts

### 6.0 SUMMARY AND CONCLUSIONS

## 1.0 INTRODUCTION

Thornton O'Connor Town Planning in association with Todd Architects, Cronin Sutton Consulting Group, JV Tierney & Co. Consulting Engineers, The Big Space Landscape Architects, The Tree File, 3D Design Bureau, Moore Group, AWN Consulting Environmental and Acoustics Advisors, Maurice Johnson and Partners and Eire Ecology have been retained by Bartra Property (Castleknock) Limited to prepare this planning application in respect of a proposed Shared Living development at Brady's Public House, Old Navan Road, Dublin 15.

The subject site has recently been purchased by our Client with the intention of developing a shared living scheme. The proposed development comprises the provision of 210 No. Shared Living bedspaces on an underutilised plot that is located in close proximity (c. 300 No. metres as the crow flies) to Connolly Hospital Blanchardstown (c. 800 No. metres / 11 No. minutes walking distance) and c. 350 No. metres (as the crow flies) from Castleknock Rail Station (c. 550 No. metres / 7 No. minute walking distance).

We note that the Environmental Report submitted as part of the pre-application submission to An Bord Pleanála established that an Environmental Impact Assessment Report (EIAR) is not required to accompany the subject application. This Report was prepared to address Section 5(5)(iii) of the *Planning and Development (Housing) and Residential Tenancies Act, 2016*, which states that any pre-application request to the Board by a prospective Applicant to enter into consultation in respect of a development should include '*a brief assessment of the nature and purpose of the development and of its possible effects on the environment*'. We note that the development has been screened out of the EIAR process at pre-application stage however we are formally submitting the subject Environmental Report as part of this application to allow for a comprehensive and robust assessment of the proposed development.

This Report is intended to be read in conjunction with the Planning Report, Statement of Consistency and all other plans and reports that accompany this application, which provide a detailed overview of the nature and purpose of the proposed development and detail the relevant environmental considerations of relevant technical disciplines.

This document is intended as a summary review of the outputs of preliminary scoping carried out on the proposed development on possible effects on the environment and detail targeted measures to address any matters potential impacts.

## 2.0 DESCRIPTION OF SUBJECT SITE

### 2.1 Site Location and Description

The subject site (c.o.317 ha or 3,170 sq m) is located on the Old Navan Road close to the junction of Old Navan Road and Navan Road (N3) and is in close proximity to the M50 motorway. The subject lands currently comprise a part 1-2 No. storey public house (1,243 sq m GFA), located at the north-east corner of the site with internal roads and ancillary car parking occupying the remainder of the site.

The site is bounded to the north-east by a public park, to the south – east by a residential property, to the south-west by the Old Navan Road and to the north – west by the entrance road to the Talbot Downs residential housing estate. The immediate context of the subject site, which is mostly rectangular in shape, comprises primarily 2 No. storey residential dwellings with a range of uses located within a 10-minute walk including cafes, banks and a Post Office.

### 2.2 Zoning Objective

The subject site is zoned Objective 'RS' in the *Fingal County Council Development Plan 2017 – 2023* where the objective is to 'provide for residential development and protect and improve residential amenity' (see 2.1 below).



Figure 2.1: Zoning Map with Subject Site Shaded in Red (Indicative Only)

Source: *Fingal Development Plan 2017 – 2023, Annotated by Thornton O'Connor Town Planning, 2019*

'Permitted in Principle' uses on lands zoned objective 'RS' include, but are not limited to, residential; sheltered accommodation; residential care home/retirement home; community facility and education. As the subject scheme proposes a Shared Living residential development, the proposed development fully complies with the zoning objective pertaining to the site.



Furthermore, the proposed development is in line with the provisions of *Strategic Policy 5* outlined in the *Fingal County Council Development Plan 2017-2023*, namely to '*consolidate the growth of the major centres of Blanchardstown and Balbriggan by encouraging infill development and intensification of development within appropriate locations.*'

Therefore, it is our opinion that the proposed development is in line with both National and Local Planning Policy as detailed in the accompanying Planning Report and Statement of Consistency.

### 3.0 DESCRIPTION OF PROPOSED DEVELOPMENT

Bartra Property (Castleknock) Limited intend to apply to An Bord Pleanála for permission for a strategic housing development at this 0.3,170 ha site at Brady's Public House, Old Navan Road, Dublin 15, D15 W3FW.

The development will principally consist of: the demolition of the existing part 1 to part 2 No. storey over partial basement public house and restaurant building (1,243 sq m) and the construction of a part 1 to part 5 No. storey over basement Build-to-Rent Shared Living Residential Development (6,549 sq m) comprising 210 No. bedspaces (182 No. single occupancy rooms, 4 No. accessible rooms and 12 No. double occupancy rooms).

The development also consists of the provision of communal living/kitchen/dining rooms at each floor level to serve the residents of each floor; communal resident amenity spaces for all residents including tv/cinema room at basement level, gymnasium and lounge/reception area at ground floor level, a library/study at third floor level and a private dining room at fourth floor level; external roof terrace at third floor level (78 sq m) facing north-east, north-west and south-west; external communal amenity courtyards at basement (170 sq m) and ground floor level (336 sq m); external amenity space at basement level accessed from the communal living/kitchen/dining room (30 sq m); balconies at third floor level facing north-east/north-west (14.35 sq m); resident facilities including launderette, linen store, accessible WC and bin store; 2 No. accesses to the public park along the north-eastern boundary; 2 No. car-share parking spaces; a lay-by and delivery bay; emergency gate access to the courtyard (north-west boundary); bicycle parking; boundary treatments; hard and soft landscaping; plant; PV panels; substation; switch room; generator; lighting; and all other associated site works above and below ground.

## 4.0 EIA SCREENING METHODOLOGY

An Environmental Impact Assessment (EIA) is a process whereby the potential effects of development projects on the environment are assessed. The particulars of the assessment procedure are adopted through European Directives and correlate to the provisions set out in the *Planning and Development Act 2001* (as amended). An EIA is required to be carried out as part of an application whereby the proposed development exceeds the limitations of Schedule 5 of the *Planning and Development Regulations 2001* (as amended).

A Sub-Threshold EIAR is required where it is considered by the Planning Authority that the development would be likely to have a significant effect on the environment. The criteria for the assessment of sub-threshold impacts is set out in Schedule 7 of the *Planning and Development Regulations 2001* (as amended).

An assessment of the identified *direct, indirect, secondary, cumulative, short, medium, and long-term, permanent and temporary, positive and negative* effects of the proposed development during the construction and operational phases of the development is also required to be carried out in response to Schedule 6 of the *Planning and Development Regulations 2001* (as amended).

### 4.1 Legislation and Guidance

Schedule 5 of the *Planning and Development Regulations, 2001* (as amended) sets out the criteria for the specific development proposals which are required to be accompanied by an EIAR as per Article 93 of those same regulations.

### 4.2 EIA Thresholds

As the proposed development is for a residential use the most relevant assessment category of Schedule 5 is considered to be part 2, paragraph 10 (b) – *Infrastructure Projects* which identifies developments requiring EIS as;

- (i) Construction of more than 500 dwelling units.
- (ii) Construction of a car-park providing more than 400 spaces, other than a car-park provide part of, and incidental to the primary purpose of, a development.
- (iii) Construction of a shopping centre with a gross floor space exceeding 10,000 square metres.
- (iv) Urban development which would involve an area greater than 2 hectares in the case of business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere. (In this paragraph, "business district" means a district within a city or town in which the predominant land use is retail or commercial use.)

The proposed application comprises the demolition of the existing public house and the construction of a part 1 to part 5 No. storey Shared Living development comprising 210 No. bedspaces with living/kitchen/dining spaces provided at each level to serve the residents of the shared living scheme and communal resident amenity spaces including lounge/reception room and gymnasium at ground floor level, a cinema room at basement level, a library/study at third floor and a private dining room at fourth floor.

The application site is c.o.317 ha and as such it does not exceed the limitations as set out above in regard to urban developments.

It is considered that the proposed development is not required to be accompanied by an EIAR as it has been demonstrated that it does not surpass the limitations as set out in the *Planning and Development Regulations (2001), Schedule 5, Part 2, Paragraph 10 (b)* for Infrastructure projects.

#### 4.3 Sub Threshold Projects Requiring EIA

Part 10 of the *Planning and Development Regulations, 2001* defines sub-threshold developments as 'development of a type set out in Schedule 5 which does not exceed a quantity, area or other limit specified in that Schedule in respect of the relevant class of development.'

As the proposal does not exceed the limitations of Schedule 5 as set out above, the proposed development is required to be assessed against the criteria for sub-thresholds. The assessment will determine whether the proposal 'would or would not be likely to have a significant effect on the environment'.

Furthermore, in assessing whether the proposed development requires an EIA, regard must also be given to European Directive 2014/52/EU. The EIA Directive 2014/52/EU came into effect on the 15<sup>th</sup> May 2014, asserting the rules for assessing the potential effects of development projects. As of the 16<sup>th</sup> May 2017, it is compulsory for member states to have due regard of the Directive in assessing whether a development proposal requires an accompanying EIA.

#### 4.4 EIA Screening Exercise

The proposed development will be assessed against the following criteria;

- A. Characteristics of Proposed Development
- B. Location of Proposed Development
- C. Characteristics of Potential Impacts

##### 4.4.1 Characteristics of Proposed Development

The characteristics of the proposed development have been assessed with regards to the following criteria as set out in Annex III of Directive 2014/52/EU and Schedule 7 of the *Planning and Development Regulations, 2001 (as amended)*;

**(a) The size and design of the whole project;**

This planning application is submitted in conjunction with a Planning Report prepared by Thornton O'Connor Town Planning and a Design Statement prepared by Todd Architects.

As per Section 3.0 of this report, the proposed development comprises a Shared Living scheme (210 No. bedspaces). The proposed development is generally within the parameters of the residential scheme permitted under FCC Reg. Ref. FW16A/0079 and ABP Ref. PLo6F.248037) at the subject site, although a different layout is proposed which links the blocks through the centre of the site.

We note that an additional partial floor level has been proposed at the subject site from that granted at the site in 2017. However, this additional floor level relates only to the centre of the site in the form of a narrow strip and therefore, it is our professional planning opinion that no adverse impact will occur as a result of this additional floor area. This is in accordance with the *Building Height Guidelines 2018* which states that *'there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas.'* We note that the building has been set back at second floor level by an additional 6.63 m and by an additional 3.43 m at third and fourth floor levels from the rear of properties along Talbot Court to the south-east subsequent to the pre-planning consultation meeting with An Bord Pleanála to ensure that the scheme can be assimilated within its surrounding context without any material impact on surrounding residential amenity. Please see Statement of Response prepared by Thornton O'Connor Town Planning and Architectural Drawings by Todd Architects submitted with this planning application.

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

The proposed use of the site is consistent with the zoning as per the adopted *Fingal Development Plan 2017-2023*. The application site is located within 'RS' zoned land which aims to *'provide for residential development and protect and improve residential amenity'*.

A search of Fingal County Council's online planning application directory for current and determined applications as of the 26<sup>th</sup> August 2019 did not highlight any applications which would be of significance to the proposed development scheme.

It is anticipated that the cumulation impact of proposed development *would not be likely to have a significant effect on the environment* in cumulation with other existing and/or approved projects.

**(c) The Use of Natural Resources, in Particular Land, Soil, Water and Biodiversity;**

The demolition and construction phases of proposed development on a brownfield site that requires excavation will involve the consumption of natural energy sources, the movement of soil and the use of water and other various raw materials. However, it is anticipated that throughout the demolition, construction and operation of the scheme, the development would not result in the use of large amounts of natural resources greater than that associated with comparable developments or to the extent that would have a significant impact on the environment.

Water usage will be similar to other developments that are comparable in size and it is envisioned water needed for construction will be supplied by the existing water connection currently serving the development site. Excavated soil removed from site will be suitably classified and sent to an appropriate landfill. No contamination was noted in the site investigation report.

It is anticipated that the proposed development would not be likely to have a significant effect on the environment.

**(d) The production of waste;**

It is acknowledged that waste will be generated during the demolition, construction and operation of the development. An Outline Demolition and Construction Waste Management Plan (ODCWMP) has been prepared by CS Consulting accompanied by an Operational Waste Management Plan (OWMP) prepared by AWN Consulting Environmental and Acoustics Advisors. The reports outline the measures which have been put in place to avoid and/or mitigate against any potential impacts.

The ODCWMP notes that the following measures are proposed to ensure effective management of construction waste at the development site, to maximise recycling of construction waste, and to minimise the environmental impact of construction waste:

- On-site segregation of all waste materials into appropriate categories.
- All waste material will be stored in skips or other suitable receptacles in a designated waste storage area on the site.
- Wherever possible, left-over material (e.g. timber cut-offs) and any suitable demolition materials shall be reused on or off site.
- Uncontaminated excavated material (top-soil, sub-soil) will be reused on site in preference to the importation of clean fill, as soil to be reused or removed from site must be tested to confirm its contamination status and subsequent management requirements.
- All waste leaving the site will be transported by a suitably licensed/permitted contractor and taken to a licensed/permitted facility.
- All waste leaving the site will be recorded and copies of relevant documentation retained.

The ODCWMP notes in summary that:

*'with a high level of due diligence carried out at the site, it is envisaged that the environmental impact of the construction phase of the proposed development will be of small scale and short duration, with respect to waste management.'*

The OWMP notes that the waste strategy complies with all legal requirement waste policies and best practice guidelines and the *'implementation of this OWMP will ensure a high level of recycling, reuse and recovery at the development'*.

It is anticipated that the proposed development would not be likely to have a significant effect on the environment.

**(e) Pollution and nuisances;**

As with all planning applications, there will be potential for dust and noise produced during the construction period. However, as the proposal represents a single block (as opposed to individual houses for example), it is considered that this impact will be short-term.

Construction noise will be mitigated by ensuring that work only takes place during the permitted hours of construction as prescribed in the planning conditions.

As detailed in the Outline Construction Management Plan prepared by Cronin Sutton Consulting Engineers, standard dust and noise prevention measures will be incorporated into the construction works. The Outline Method Statement for Demolition of Existing Building also notes that *'dust prevention measures shall be included for control of any site airborne particulate pollution. The Contractor shall put in place and monitor dust levels in the vicinity using a Bergerhoff gauge instrument...the Contractor shall continuously monitor dust over the variation of weather and material disposal to ensure the limits are not breached throughout the project. It is proposed to use a "Dust Boss" spray cannon machine (or similar) in order to contain dust on site'*.

It is anticipated that the pollution and nuisances arising from the development *would not be likely to have a significant effect on the environment.*

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

Throughout the demolition and construction phases of the development, applicable building and fire regulations and appropriate environmental controls will be put in place.

Further, there are no technologies, materials or substances proposed which may cause concern.

The development is neither a Seveso site nor near any Seveso sites.

The lands have been zoned under the *Fingal County Council Development Plan 2017-2023* and therefore have been subject to both a Strategic Environmental Assessment and a Strategic Flood Risk Assessment with a site specific Flood Risk Assessment included with this application confirming no risk of flooding.

It is anticipated that the proposed development *would not be likely to have a significant effect on the environment* through risk of major accidents or disasters.

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

There are no foreseen risks to human health. As noted, appropriate noise and pollution (including water) mitigation measures are to be put in place during the demolition and construction phases of the development. The proposed development is to be connected to public foul and storm water systems. There are no foreseen risks to human health during the operation of the development.

It is anticipated that the proposed development would not be likely to have a significant effect on the environment in respect of risk to human health.

#### 4.4.2 Location of Proposed Development

Schedule 7 of the *Planning and Development Regulations 2001 (as amended)* requires an assessment of the environmental sensitivity of the geographical areas likely to be affected by proposed development, having regard to:

**(a) The existing and approved land use;**

The proposed development is located on suitably zoned lands where residential use has previously been permitted. The proposed development includes the demolition of the existing structure and replacement with a new building (the principle of demolishing the Brady's Public House was established under the Grant of Permission for a Residential Apartment Scheme (FW16A/0079 and ABP. Ref. PLo6F.248037). As such, it is considered that the proposed development would not be likely to have a significant effect on the environment in comparison to the existing land-use as an underutilised site.

An Appropriate Assessment Screening has been undertaken by Moore Group – Environmental Services in respect of the proposed development and is submitted with this planning application. The screening report is a documentary record of the AA process carried out on the effects of the project comprising a Shared Living Development at the subject site.

The report states:

*'The closest European site is Rye Water Valley/Cartron SAC (Site Code 001398), however this site is hydrologically upstream of the Project and therefore has no relevant connectivity. The closest sites with potential connectivity are located in Dublin Bay and the nearest of these is the South Dublin Bay and River Tolka Estuary SPA (Site Code 004024), which is located approximately 9.5 km to the east of the Project.'*

Furthermore, there are no other European sites located within the potential zone of impact of the proposed Project.

It concludes that there *'is no potential for significant effects during the construction phase. Similarly, in light of the developments proposed connection to existing municipal sewers for foul water and surface water, there are no significant emissions predicted during its operational phase'*. The report concludes that *'it is considered that there will be no potential for significant effects on any European site and therefore potential effects on European sites can be excluded at this preliminary screening stage'*.

In regard to the ecological network supporting Natura 2000 sites, Moore Group outline that features such as ponds, woodlands and important hedgerows were considered during the AA process. Moore Group note that the subject lands are *'located approximately 35 m to the north of the Royal Canal proposed Natural Heritage Area. However, there is no relevant biological connectivity with the Project and the Grand Canal'*. Furthermore stating *'given that the proposed development is to be connected to the existing municipal sewer network and the lack of relevant connectivity to any European Sites, there will be no in-combination effects.'*

The AA screening report establishes that it is not necessary to undertake any further stage of the Appropriate Assessment process.

It is considered that the development *would not be likely to lead to significant likely impact on the environment.*

**(b) The relative abundance, quality and regenerative capacity of natural resources in the area:**

The absorption capacity of the natural environment, paying particular attention to the following areas:

**(i) Wetlands, Riparian Areas and River Mouths;**

The application site is located 35 m north of the proposed *Royal Canal proposed Natural Heritage Area*. The AA Screening prepared by Moore Group states that:

*'An analysis of the proposed Natural Heritage Areas and designated Natural Heritage Areas in terms of their role in supporting the species using Natura 2000 sites was undertaken. It was assumed that these supporting roles mainly related to mobile fauna such as mammals and birds which may use pNHAs and NHAs as "stepping stones" between Natura 2000 sites.'*

The report concludes that it is not necessary to undertake any further stages of the Appropriate Assessment process. We note that the application site is not located in close proximity to any wetlands or river mouths.

It is therefore considered that the development will not be likely to lead to significant effects on the absorption capacity of wetlands, riparian areas and river mouths.

**(ii) Coastal Zones and The Marine Environment;**

The site is not located in proximity to any coastal zone and/or marine environment.

It is therefore considered that the development will not be likely to lead to significant effects on the absorption capacity of any coastal zone and the marine environment.

**(iii) Mountain and Forest Areas;**

The application site is not located in close proximity to any mountainous or forest areas.

It is therefore considered that the development will not be likely to lead to significant effects on the absorption capacity of any mountain and forest areas.

**(iv) Nature Reserve and Parks;**

An online search of the National Parks and Wildlife Service database found that there are no nature reserves in close proximity to the application site. The application site is c. 800m from the Grange and Waterville Park. It is anticipated that that the potential increase in park usage

would not impact on the quality of the amenity nor impact the absorption capacity of the natural environment.

It is considered that the development will not be likely to lead to significant environmental effects on any nature reserves and therefore will not impact on the absorption capacity of the natural environment.

**(v) Natura 2000 Areas Designated Pursuant To 79/409/EEC and 92/43/EEC;**

The site is not located within any statutory designated areas. An Appropriate Assessment Screening Report prepared by Moore Group - Environmental Services is enclosed and noted at Section 4.4.2 (a) of this report, the AA screening concludes that there will be no significant effects for any European sites.

Moore Group Environmental Services have established that:

1. *The Project is not directly connected with, or necessary to the conservation management of the European sites considered in this assessment.*
2. *The Project, alone or in combination with other projects, is not likely to have significant effects on the European sites considered in this assessment.*
3. *It is possible to rule out likely significant impacts on any European sites considered in the assessment.*
4. *It is possible to conclude that there would be no significant effects, no potentially significant effects and no uncertain effects if the Project were to proceed.*

It is considered that the development will not be likely to lead to significant effects on the environment.

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

There are no records of the application site being located in an area as described above. It is noted that the application site currently benefits from a permitted development for a similar scheme in terms of scale and mass.

It is considered that the development will not be likely to lead to significant effects on the environment.

**(vii) Densely Populated Areas;**

As per the *Fingal County Council Development Plan 2017-2023*, the application site is located in an area zoned 'RS' where the objective is to 'provide for residential development and protect and improve residential amenity'. 'Residential' use is permitted in principle under this zoning objective. The principle of providing a residential scheme at the subject site has been established previously under FCC. Reg. Ref. FW16A/0079 and ABP Ref. PLo6F.248037.

It is concluded that the proposed development would not have a significant likely impact on the absorption capacity of the natural environment.

**(viii) Landscapes and Sites of Historical, Cultural/Archaeological Significance;**

An online search of the National Monuments Service database found that there are no recorded national monuments in close proximity to the subject site. It was also found that there are no recorded monuments within the boundaries of the subject site.

An online search of the National Inventory of Architectural Heritage database found that the nearest recorded Buildings of Architectural Heritage are the Talbot Bridge (Reg. No. 11354003) and the Granard Bridge (Reg. No. 11354002).

It is noted that there are no recorded protected structures in close proximity to the subject site. Therefore, the proposed application is not considered to negatively impact on the setting of any protected structure.

It is considered that the proposed development would not have a significant likely impact on the absorption of the natural environment in regard to landscapes and sites of historical, cultural and archaeological significance.

**4.4.3 Type and Characteristics of Potential Impacts**

The primary impacts of the development identified at Sections 4.4.1 and 4.4.2 of this report (Characteristics of the Development and the Location of the Site) refer to the potential traffic disruptions, increase in noise and dust and production of waste as result of the demolition, construction and operational phases. The use of the land and the risk of accidents have been recognised as not being potential impacts during the operation of the development. Although there are no likely significant impacts envisaged, in accordance with the Annex III of Directive 2014/52/EU, the impacts identified have been assessed further in regard to the type and characteristics of potential impacts.

**(a) The magnitude and spatial extent of the impact.**

As noted throughout this report, the proposed development is consistent with the designated land use as per the *Fingal Development Plan 2017-2023* and the scheme previously permitted by Fingal County Council (FCC Reg. Ref. FW16A/0079 and An Bord Pleanála (Reg. Ref. ABP PLo6F.248037) on the 5<sup>th</sup> October 2017. The demolition and construction works are expected to have minimal impacts over a short-term period on the immediate area surrounding the application site.

The development works proposed are not anticipated to result in any impacts which would have a likely significant effect on the environment.

**(b) The nature of the impact.**

The proposed scheme will result in short term impacts during the demolition and construction phases of the development, such as temporary additional traffic during the demolition and construction period and temporary noise and dust pollution. The impacts of the development are not considered to be any greater than that associated with typical developments. There are no significant negative impacts likely to arise.

**(c) The transboundary nature of the impact.**

The proposed development is not considered to negatively impact on any sites in the surrounding vicinity beyond during the temporary construction period. The application site is not located within any designated areas.

The application is supported by the submission of an Appropriate Assessment Screening Report. As noted at Sections 4.4.2 (a) and 4.4.2 (b)(v), it has been established that the proposed development would not have potential for significant effects on any European sites.

There are no anticipated significant likely negative impacts on the environment.

**(d) The intensity and complexity of the impact.**

The potential impacts identified at Section 5.0 are not considered to result in an intensity or complexity that would have a long-term impact on the environment. The identified potential impacts as detailed in the technical reports will be moderate and managed throughout the development. All construction activities will be carried out in compliance with the recommendations of BS 5228, "Noise Control on Construction and open sites part 1" and comply with BS 6187 Code of Practice for Demolition. For additional details please refer to the Outline Construction Management Plan prepared by CS Consulting.

There are no anticipated significant likely negative impacts on the environment.

**(e) The expected onset, duration, frequency and reversibility of the impact.**

The potential impacts of the demolition and construction phases of the development which are identified at Section 5.0 are considered to be short-term. It is acknowledged that the extent of these impacts will vary throughout the development process, however it is not anticipated these impacts on the environment would be significant.

There are no significant negative impacts which are likely to occur during the operational phases of the proposed residential development.

**(f) The cumulation of the impact with the impact of other existing and/or approved projects and the possibility of effectively reducing the impact**

The application site is located on land zoned for residential use. Furthermore, there is an existing permitted scheme for a residential development at the subject site (the proposed layout is generally within the parameters of the extant permission, although a different layout is proposed which links the blocks through the centre of the site). Given that the proposed development is to be connected to the existing municipal sewer network and the lack of relevant connectivity to any European Sites, there will be no in-combination effect, as noted in the Appropriate Assessment Screening Report enclosed.

The cumulation of the impact with the impact of other existing projects is not considered to cause a likely significant effect on the environment.

**(g) The possibility of effectively reducing the impact.**

The proposed development will undertake all necessary and appropriate mitigation measures to avoid or limit any likely significant effects on the environment that may arise.

The submission is supported by a Mobility Management Plan, Sustainability/Energy Report, Outline Construction Management Plan, Outline Demolition Management and Construction Waste Management Plan and an Operational Waste Management Plan.

## 5.0 POSSIBLE EFFECTS ON THE ENVIRONMENT

The following section briefly assess the proposed development in the context of environmental topics referred to in Article 3 of Directive 2014/52/EU.

### 5.1 Human

The proposed development is located within a suburban area of commercial and residential units and will provide for 210 No. bedspaces (provided in 198 No. suites) within the Shared Living scheme. The proposal responds directly to the housing need for accommodation for one bed units.

The proposed development is considered to be consistent with national, regional and local planning policy and guidance, as set out within the accompanying Statement of Consistency Report and Planning Report. The proposal will result in direct and positive effects in terms of facilitating population growth.

As identified throughout Section 4.4.3 of this report, it is established that there will be short term impacts at varying levels during the demolition and construction phases of the development. As set out in the accompanying Outline Demolition and Construction Waste Management Plan, Outline Method Statement for Demolition of Existing Building and the Outline Construction Management Plan prepared by CS Consulting, mitigation measures such as noise blankets and dust suppression spraying will be put in place to minimise any impact on the surrounding area during demolition and construction. There are no projected long-term impacts of the development and it is noted that the development comprises zero private car-parking spaces and 2 No. car share car parking spaces, encouraging sustainable modes of transport.

The proposed development has had due regard for water and waste infrastructure throughout the concept and design process. The Engineering Services Report and Drawings prepared by CS Consulting demonstrate the proposed foul drainage arrangements, stormwater drainage arrangements and watermain infrastructure arrangements for the proposed scheme. It has been established that the water and waste water infrastructure is capable of meeting the demand created by the development.

### 5.2 Biodiversity (Flora and Fauna)

The subject site is not located within any Special Protection Areas (SPA) or National Heritage Areas. There are no site-specific designations in regard to flora and fauna and there is no vegetation of value located on site. However, an AA screening report has been prepared by Moore Group Environmental Services and is submitted in support of the application.

### 5.3 Environmental Geography (Soil, Water, Air, Climatic Factors and the Landscape)

#### 5.3.1 Soil

It is anticipated that the proposal would not be likely to impact on the environment in regard to soil and/or geology.

### 5.3.2 Water

The application site is located within the Liffey and Dublin Bay Water Framework Directive (WFD) catchment area as identified on the EPA's Water Regions online map. The EPA reports that the Dublin Bay Coastal waters are unpolluted. An increase in water usage is expected as a result of the development but this has been deemed acceptable by Irish Water in their pre-connection enquiry response.

The proposed development will not result in the discharge or drainage to watercourses. Excavations are required on site to form foundations and a new basement. The water table is expected to lie within these excavations and as such water will need to be controlled during construction. Specialist dewatering advice will be sought and the required licences pursued in order to pump water on site and control water entering the excavation. Alternatively, secant piling retaining walls can be used to control water in the excavation if pumping proves unfeasible.

As noted at Section 4.4.1 (c), it is not anticipated that the use of natural resources such as water at the site would be greater than that of ordinary use or have a significant impact on the environment.

The application site is located within Flood Zone C as demonstrated in the accompanying Site Specific Flood Risk Assessment prepared by Cronin Sutton Consulting Engineers.

### 5.3.3 Air Quality Pollution and Climate

The Environmental Agency classifies the air quality of the application site as 'Good' as illustrated below at Figure 5.1. The possible effects on air quality as result of the development include a short-term increase in dust and emissions arising during the demolition and construction phases. Dust suppression measures will be employed to control airborne particulate pollution and a 'Dust Boss' spray cannon machine will be used to contain dust on site. Nonetheless, the contractor will continuously monitor dust throughout the duration of works, ensuring EPA limits are adhered to.

As noted in Section 5.2 of this report, it is duly noted that the development will discourage the use of car ownership through the provision of zero car parking spaces and 2 No. car share car parking spaces. Sustainable modes of transports such as walking, cycling and the utilisation of public transport from the subject site will be encouraged. It is anticipated that the proposal would not be likely to impact on the environment in regard to air quality, pollution and climate.

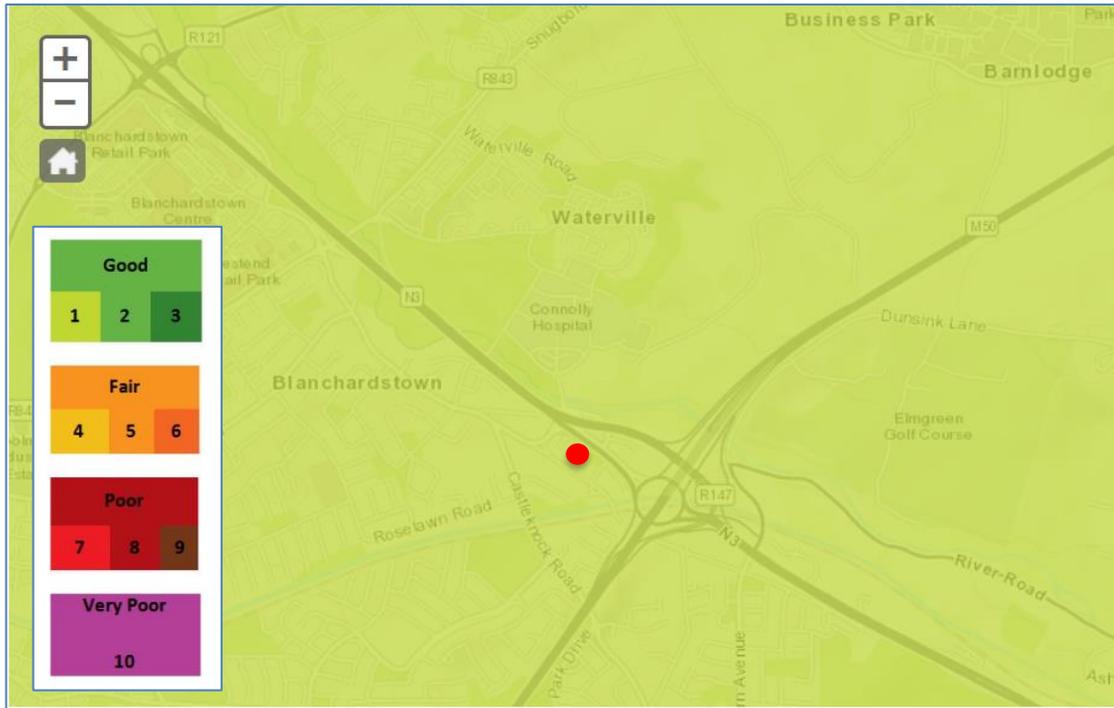


Figure 5.1: Air Quality Index Surrounding the Application Site (Red Dot – Indicative Only)

Source: <http://www.epa.ie/irelandsenvironment/air/>, Annotated by Thornton O’Connor Town Planning, 2019

### 5.3.4 Landscape

The application site is not located within an Area of High Landscape Value or have any specific amenity, landscape or visual objectives pertaining to the site.

The scheme will provide passive overlooking of the park to the north as well as a direct link into the park. The development incorporates high-quality external amenity spaces for future residents ensuring that the proposed development can be assimilated into the surrounding landscape. A Landscape Masterplan, Landscape Report and Landscape and Visual Appraisal prepared by The Big Space Landscape Architects are enclosed. The LVIA concludes that the significance of the predicted visual impact is considered low and neutral.

### 5.4 Material Assets (Architectural and Architectural Heritage, and the Cultural Heritage)

Brady’s Public House is not listed on the Fingal County Council Record of Protected Structures. The principle of demolishing the structure on site has been established in the assessment of the extant permission for an apartment scheme at the subject site (FCC. Reg. Ref. FW16A/0079 and ABP. Ref. PLo6F.248037).

### 5.5 The Existence of the Proposed Development

The proposed development is located on ‘RS’ zoned land where it is anticipated that there will not be any resultant negative impacts from the operation of the development. It is noted that appropriate mitigation measures will be put in place as detailed throughout this report and the

supporting technical reports. This planning application is accompanied by a Planning Report and Justification Report prepared by Thornton O'Connor Town Planning which provides a detailed rationale and justification for the development of the proposed scheme on this underutilised, brownfield site.

## 5.6 The Use of Natural Resources

As outlined at Section 4.4.1 (c), the development will involve the consumption of natural resources throughout the development process, however it is not anticipated to have a significant impact on the environment. It is anticipated that throughout the demolition, construction and operation of the scheme the development would not result in the use of large amounts of natural resources greater than that associated with comparable developments or to the extent that would have a significant impact on the environment.

## 5.7 The Emission of Pollutants, the Creation of Nuisances and the Elimination of Waste

### 5.7.1 Traffic and Access

Having regard to the nature of the use proposed, the typical residents who are in-situ short-medium term and the location of the site within walking/cycle distance to numerous significant employers, it is not intended to provide on-site car-parking for the residents. We note that the Applicant has engaged GoCar who are willing to provide 2 No. car share car parking spaces on the site (provided to the front of the site).

The Outline Construction Management Plan enclosed sets out that construction traffic will access the site from Old Navan Road. It is anticipated that the peak of HGV movements to and from the site will be during the demolition of the existing structure and excavations works and that the construction traffic impact on the surrounding local road network will be minimal. The Contractor will submit a Construction Traffic Management Plan to the Local Authority for approval.

Mitigation measures will be put in place for potential dust and dirt pollution arising from construction vehicles exiting the site, as detailed in the accompanying Construction Management Plan prepared by CS Consulting Engineers.

### 5.7.2 Noise

The temporary noise emitted during the construction and demolition phases of the development will have the potential to impact on the surrounding areas. It is noted that noise monitoring will be carried out for a period of at least 2 weeks prior to any work commencing on site, in order to establish a baseline. The demolition and construction works will be carried out in accordance with the recommendations of BS 5228 '*Code of Practice for noise and vibration control on construction and open sites - Part 1: Noise*' and comply with BS 6187 Code of Practice for Demolition. Mitigation measures will be undertaken through the development in accordance with best practice guidelines.

It is anticipated that the operation of the development will not result in any long-term noise impacts to neighbouring properties.

### **5.7.3 Waste**

An Outline Demolition and Construction Waste Management Plan (ODCWMP) has been prepared by CS Consulting and an Operational Waste Management Plan (OWMP) has been prepared by AWN Consulting and are enclosed as part of this application as supporting technical documents. These reports set out measures to ensure effective management of construction waste at the development site, to maximise recycling of construction waste, and to minimise the environmental impact of construction waste. The OWMP notes that the waste strategy complies with all legal requirement waste policies and best practice guidelines.

### **5.8 Analysis of Identified Impacts**

Thornton O'Connor Town Planning have identified the potential impacts anticipated to arise from the proposed development. The identified impacts are not anticipated to have long term negative impacts on the surrounding environment of the subject site. Similarly, the cumulative impacts of the development are not considered to be significant. The proposed development is considered to have a positive impact in terms of meeting the needs of the population, seeking residential accommodation.

## 6.0 SUMMARY AND CONCLUSIONS

This report has been prepared in accordance with Schedule 5 and Schedule 7 of the *Planning and Development Regulations 2001* (as amended) and has had due regard of the criterion set out within the European Directive 2014/52/EU. The report has assessed the proposed development in terms of the possible effects on the environment including human, biodiversity, flood, air, water, cultural heritage, traffic and access, noise, material assets and landscape. Through an EIA screening methodology of EIA thresholds, it has been established that an EIAR not required to accompany the subject application.

The proposed development has been assessed against the criterion for sub threshold projects. It has been established that it is anticipated that the proposal would not be likely to have a significant effect on the environment as result of the characteristics of the proposed development, location of proposed development or the characteristics of potential impacts.

It has been established that an Environmental Impact Assessment Report (EIAR) is not required to accompany the subject application.

