TOM PHILLIPS + ASSOCIATES
PLANNING FOR THE FUTURE

80 Harcourt Street
Dublin 2
D02 F449
t +353 1 478 6055

Also at:
Suites 454 + 455
No. 1 Horgan's Quay
Waterfront Square
Cork
T23 PPT8
t +353 21 212 9840

e info@tpa.ie
w www.tpa.ie

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCREENING REPORT

Strategic Housing Development (SHD)
NORTHWOOD CRESCENT, SANTRY DEMESNE, DUBLIN 9.

On behalf of: KATEGALE LTD
12 Merrion Square North
Dublin 2, D02 H798

30 March 2022

1.0 INTRODUCTION

This Environmental Impact Assessment (EIA) Screening is submitted by Tom Phillips + Associates (TPA), Town Planning Consultants on behalf of our Client, Kategale Limited, in respect of the proposed Strategic Housing Development of lands at the above location.

In summary, Kategale Limited is seeking permission for a mixed-use development on a c. 1.3 ha site, bounded to the north by Northwood Avenue, to the east by Northwood Road, and to the south and west by Northwood Crescent. The site is situated at a strategic location on Northwood Avenue, which is within the historic Santry Demesne and together with Gulliver's Retail Park forms part of the western section of the overall Northwood development. The proposed development area immediately abuts Northwood Crescent, which accommodates 'The Crescent Building' office complex on its western boundary. The surrounding lands have seen significant land use change in recent years with a diverse mix of uses including residential, commercial, office and retail uses, among others.

A description of the proposed development is as follows:

> *'Kategale Limited intend to apply to An Bord Pleanála for permission for a Strategic Housing Development with a total application site area of c. 1.3 ha, on a site located at Northwood Crescent, Santry Demesne, Dublin 9. The site is bounded by Northwood Crescent to the south and south-west; The Crescent Building to the north-west; Northwood Avenue to the north; and Northwood Road to the east.*
>
> *The development, with a total gross floor area of c. 27,904 sqm, will consist of the construction of 268 no. Build-to-Rent apartment units arranged over 2 no. blocks ranging in height from 5 to 11 storeys (Block A will comprise 54 no. 1-bedroom units and 44 no. 2-bedroom units; Block B will comprise 70 no. 1-bedroom units and 100 no. 2-bedroom units); Residential amenity facilities including a reception, post room and building management office; lounge areas, shared workspace, multimedia/games room, meeting rooms and a single storey residents' gym at podium level (145 sqm); ancillary uses comprising a generator room; utilities room; bin stores; water tank rooms; sprinkler tank room; bicycle stores; storage rooms and plant rooms; the provision of all private and communal open space, including balconies/terraces to be provided for each apartment; and communal open space areas including a first-floor central podium garden connecting Blocks A and B and 2 no. rooftop terraces and a single storey 295 sqm crèche with dedicated outdoor play area.*
>
> *The development will also comprise the construction of a 3-storey office building with a total gross floor area of c.2,868 sqm, including ancillary uses comprising a reception/security area, staff amenities, bike stores, waste room and a plant room. The development will also include the provision of hard and soft landscaping, public realm improvements and amenity areas including public open space, a children's play area and a community outdoor dining area; the*

provision of internal roads and pathways; 142 no. undercroft car parking spaces at ground floor level, 8 no. crèche set down spaces, and 662 no. bicycle parking spaces at ground floor level and surface level. The development will also include all associated ancillary development including 2 no. ESB switch rooms and 2 no. ESB substations; ground works and foul drainage; stormwater drainage; attenuation tank and related SUDS measures, water supply; service ducting and cabling; electric vehicle charging points; public lighting; boundary treatments; and all ancillary site development and excavation works above and below ground. Vehicular access is proposed via a new entrance on Northwood Road; Vehicular set down area for crèche with access/egress is located on Northwood Crescent. The provision of 2 no. pedestrian crossings on Northwood Crescent and Northwood Road.'

The purpose of this Report is to provide:

- An assessment of the proposed development in the context of the relevant thresholds for this form of development (residential), which require the preparation of a mandatory Environmental Impact Assessment Report (EIAR);
- An assessment of sub-threshold considerations for the proposed development; and
- An outline of the scope and content of the proposed Planning Application including all relevant assessments, which we propose to submit in lieu of a formal EIAR regarding the proposed development.

This Report has had regard to the *EIA Guidance for Consent Authorities regarding Sub-threshold Development* (guidance), which was published by the then Department of the Environment, Heritage and Local Government in August 2003. We have also considered the provisions of the *Environmental Impact Assessment of Projects (EIAR) Guidance on Screening* published by the European Union in 2017. The Screening Checklist included in that document is enclosed as Appendix A to this Report.

1.1 Summary

In summary, having regard to the relevant thresholds set out in Schedule 5 of the *Planning and Development Regulations 2001 (as amended)* regarding mandatory EIS (now EIAR) provision for this form of development, in our opinion, the subject proposal comprises a sub-threshold development.

Secondly, according to the *EIA Guidance for Consent Authorities regarding Sub-threshold Development, August 2003*, a formal EIAR would not be required for this development. This is due, *inter alia*, to the development site area (c. 1.3 ha) and its locational characteristics, the proposed number of residential units (268 no.) and the fact that this proposal is unlikely to give rise to significant environmental effects. Potential cumulative impacts, taking into consideration the adjacent permitted Northwood Phase 1 permitted under Reg. Refs.

F18A/0421 and Reg. Ref. F18A/0438 (also owned by the Applicant), located to the west, has also been considered.

Thirdly, while it is considered that a formal EIAR in not required in this instance, it is proposed that detailed and comprehensive assessments as required will be prepared and will accompany the planning application, which will assess and address all of the relevant potential planning and environmental issues pertaining to the subject development. These assessments will inform development responses to the specific issues raised by development within the site. The assessments enclosed with the application will also be designed to address the issues raised by this type of development and provide the requisite levels of environmental assessment to the appropriate standards.

2.0 STATUTORY INSTRUMENTS

2.1 Schedule 5 of the Planning and Development Regulations 2001 as amended

Part X of the *Planning and Development Act 2000* (as amended) provides a basis in primary legislation for EIA. Part X of the Act establishes a framework for EIA with the detail provided in Schedules 5, 6 and 7 and 7A of the *Planning and Development Regulations 2001* as amended (Regulations).

Schedule 5 of the Regulations sets out types of development for which mandatory EIA is required and is, therefore, an important reference point in the context of establishing the threshold for EIS preparation.

In terms of the different categories of development listed in Schedule 5 of the Regulations, the subject development relates to Part 2(10)(b)(i) and (iv) of the *Planning and Development Regulations 2001* as amended regarding *'Infrastructure Projects'* respectively and provides the relevant area/development thresholds as follows:

> *'Construction of more than 500 dwelling units'*
>
> *'Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere. (In this paragraph, "business district" means a district within a city or town in which the predominant land use is retail or commercial use.)'*

The proposed development in this case comprises 268 no. residential units, which is significantly below the above threshold. In combination with the adjacent Northwood Phase 1 development, the cumulative residential units would equate to 466 no. in total, therefore also below the 500 no. dwelling threshold. As such, it is considered that a mandatory EIAR is not required on the basis of number of dwelling units. This is further borne out by the EIAR Screening Checklist enclosed as Appendix A

With regard to urban development and site area, the site is not located in an area that would be considered to comprise a '*business district*' as per the above definition. As such, the 2 ha site area threshold does not apply here.

The subject site area is c. 1.3 ha, which is significantly below the *'other parts of a built-up area'* threshold of 10 hectares. In combination with Northwood Phase 1 (c. 1.5 ha), would also be significantly below the threshold of 10 hectares. Thus, having regard to the above thresholds and the nature of the subject proposal, it is submitted that a mandatory EIAR is not required in respect of this development.

2.2 *EIA Guidance for Consent Authorities regarding Sub-threshold Development*

The issue that consequently arises is whether the proposed development, which is sub-threshold, still warrants EIAR. In this regard, we have assessed the proposal against the criteria as identified in the *EIA Guidance for Consent Authorities regarding Sub-threshold Development* (guidance), which was published by the then Department of the Environment, Heritage and Local Government in August 2003.

The primary aim of this document is:

> *"To provide practical guidance for the competent/consent authorities in deciding whether or not a sub-threshold development is likely to have significant effects on the environment. The guidance should also assist developers and EIA practitioners in forming an opinion as to whether or not EIA would be appropriate to a specific sub-threshold development proposal".*

The guidance also notes that:

> *'Irish EIA legislation mirrors the mandatory requirement in the Directive to carry out EIA in respect of certain project classes. In many cases, Ireland has adopted a substantially lower threshold than set in the Directive.'*

As illustrated above, the subject development is substantially below the mandatory EIA thresholds identified in the Regulations.

Paragraph 3.4 further states:

> *'In light of the approach by Ireland (i) in setting mandatory thresholds for each of the Annex II project classes and (ii) in setting these thresholds at substantially lower levels than comparable Annex I thresholds in the Directive, the need for sub-threshold EIA should be fairly limited in Ireland'.*

We concur with this statement and consider that the current proposal similarly does not require the preparation of a formal sub-threshold EIS.

Key Issues

The stated key issue for the competent/consent authorities in the context of the possible need for an EIA regarding sub-threshold developments is *'whether or not such development is likely to have significant effects on the environment*'. The document, therefore, provides guidance to assist authorities in determining whether or not *"significant"* effects on the environment are likely in the context of sub-threshold development.

While the guidance acknowledges that *'there are no hard and fast rules which can be applied'*, it sets out three criteria which competent/consent authorities must have regard to, in assessing whether or not the likely effects are *"significant"*.

The stated criteria for determining whether a development would or would not be likely to have significant effects on the environment are:

- *Characteristics of the Proposed Development;*
- *Location of the Proposed Development, and;*
- *Characteristics of Potential Impacts.*

The guidance also advises that particular attention should be paid to projects which are *'close to the national statutory thresholds'*, which is not the case here as illustrated above.

Characteristics of the Proposed Development

The six sub-criteria which the guidelines identify as being important in terms of the characteristics of the proposed development are set out below. The relationship between the proposed development and each of these criteria is detailed below.

An amendment to the Regulations in 2008 referenced *'the nature of any associated demolition works'* as being a relevant characteristic for assessment. On the basis that no significant demolition is proposed as part of this development, this is not considered a relevant assessment issue regarding the subject proposal.

Size of the Proposed Development

As previously outlined in Section 2.1, the subject development involves a site area of c. 1.3 ha and is situated in an area which would be classified as being *"other parts of a built-up area"*. The appropriate threshold for development in such areas is 10 hectares. The subject development, therefore, involves an area which equates to just 13% of this threshold.

The Cumulation with other Proposed Development

Live and recently approved planning applications in the vicinity of the site were reviewed on the online planning records of Fingal County Council. Two planning applications were identified in the area in the last five years (Granted under Reg. Ref. F19A/0401 and F19A/0419) for a total of 183 no. units; and a mixed used development comprising 198 no. residential units and office space with retail / café unit granted permission in 2019 (under Reg. Refs. F18A/0438 and F18A/0421) at a site <50m to the west of the site adjoining Northwood Crescent. Construction of the mixed-use development to the west of the site is projected to initiate in 2022.

As detailed in the enclosed Screening for Appropriate Assessment, prepared by RSK, which accompanies this submission, the proposed development will occur after the development of 198 no. units in a neighbouring site adjoining Northwood Crescent and therefore works should not overlap. It is proposed that foul water drainage from the site will be discharged to a private sewer and treated in the Ringsend Water Treatment Works (WWTW). Designated habitats most at risk from an overloaded WWTW at Ringsend are the sandflats and mudflats exposed at low tide. The main conservation issues to these habitats are pollution from agricultural, forestry and wastewater sources, as well as impacts associated with marine aquaculture, particularly the Pacific oyster (Magallana gigas) (NPWS 2019). It is considered that sewage effluent could not be considered to pose a direct threat to these habitats. Firstly, on the grounds that the extent of seawater would likely lead to a substantial dilution effect that will pose little risk considering the habitat type and the distance from the WWTW. Secondly on the grounds that additional nutrients could promote algae growth and fish numbers which would benefit the ornithological features of the site. However, the upgrade of the Ringsend WWTW which is projected to be completed in 2023, will have the capacity post completion to treat foul water drainage from both developments and therefore overloading of the WWTW from the developments is not considered likely. In conclusion, it is considered there are no foreseen potential impact pathways associated with the other developments which could give rise to adverse in-combination effects with the proposed development.

As detailed in the Traffic and Transport Assessment prepared by Waterman Moylan Consulting Engineers, the proposed development will not generate excessive vehicular traffic flows and can be supported by the existing road infrastructure, as all junctions assessed will remain under capacity post construction of the proposed development and all other committed developments in the area.

The Use of Natural Resources

Generally, the site, for the most part can be described as relatively open, vacant and derelict. A wide tarmacked pathway surrounds the site on its north, east and western boundary. The central areas are of uneven ground consisting of spoil heaps with a layer of wild grasses and buddleia and scrub. Large boulders are present in places to prevent vehicular access, particularly at the north-east of the site. The south-west of the site is overgrown with a dense layer of bramble and some substantial sized trees. The eleven trees consist of Sycamore *(Acer pseudoplatanus),* Oak (*Quercus robur*), Alder (*Alnus spaethii*) and Beech (*Fagus sylvatica*).

There is a temporary car park located on the north-eastern corner of the site, where vegetation has been cleared; at the perimeter is an existing water main and associated way leave. There is a small area of public open space at the south-eastern corner of the site, adjacent to an existing level crossing and comprising of feature light columns, stone paving, stone benches and two Alder (*Alnus spaethii*) trees.
A number of design revisions have been undertaken on the site which has reduced the impact on existing trees. This has allowed for the retention of all the mature oak and beech and the alder at the south-eastern edge of the site. The early-mature sycamore which are located within the central area of the site will be removed. It is considered that the retention of the more mature trees is a positive outcome of the redesign of the buildings and infrastructure as these trees though presenting challenges in terms of their retention in the context of the development represent something of the history of Santry Demesne. A Tree Protection Strategy & Method Statement has been prepared by a Consulting Arborist (CMK Hort + Arb Ltd.) which outlines and addresses key issues with regard to the successful retention of trees in accordance to BS 5837 such as the appointment of an arborist to oversee all works relevant to trees, a scheduling of tree and construction works, establishment of tree protection (with adherence to the Tree Protection Code of Practice), the supervision of works in the vicinity of trees, and a post construction re-assessment of retained trees.

The proposed development may require the removal of some soil from the site to facilitate construction, however quantities required for removal are not considered to have the potential to result in any significant adverse impact. There will also be some removal of low value vegetation which will be appropriately compensated by the additional planting and hard and soft landscaping measures. This will take place as part of an overall landscaping plan for the development. A comprehensive landscaping masterplan has been prepared by Áit Urbanism + Landscape Ltd. and provides for a range of new planting and open spaces which will provide the opportunity to support new habitats on the site.

As detailed in the Construction and Demolition Waste Management Plan, prepared by RSK, the contractor shall establish guidelines and controls for all activities that may impact on the surrounding environment for the duration of the works, including natural resources. The project is to be developed to provide to all personnel with the means to understand their responsibilities and to meet the contractor's statutory, contractual, and procedural obligations relating to environmental management.

Overall, it is considered that the proposed development would not have a significant effect on natural resources.

The Production of Waste

The proposed development does not include any demolition works, therefore it is not anticipated that any demolition waste will arise as a result of the construction works.

All construction works will be completed in compliance with the Construction and Demolition Waste Management Plan (CDWMP) that has been prepared for the project by RSK.

Any waste arising during construction will be managed based on the Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Development Projects. The CDWMP identifies that waste materials will be generated during the demolition and construction of the proposed development, including the initial site clearance and excavation. Careful management of these, including segregation at source, will help to ensure maximum recycling, reuse and recovery is achieved, in accordance with current local and national waste targets. It is expected, however, that a certain amount of waste will still need to be disposed of at landfill. No out of the ordinary production of waste or residues is likely during the operational phase of the development. Given the provision of appropriate facilities, environmental impacts (e.g. litter, contamination of soil or water, etc.) arising from waste storage are expected to be minimal. Particular attention must be given to the appropriate management of any construction waste containing contaminated or hazardous materials. The use of suitably licensed waste contractors will ensure compliance with relevant legal requirements and appropriate off-site management of waste. In summary, 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. No significant impacts as a result of production of waste during the construction and operation of the proposed development are anticipated.

Pollution and Nuisances

Waterman Moylan Consulting Engineers have prepared a Construction and Environmental Management Plan (CEMP) for the proposed redevelopment, which sets out the specific environmental measures and procedures to be followed for the duration of the construction phase, proposing mitigation measures for inter alia, managing noise, dust, and accidental spillages. The CEMP proposes measures to mitigate any potential impacts and minimise disturbance to any surrounding developments.

There may be some increase and disruption to traffic as a result of construction, including movement of plant, delivery vehicles and site personnel. However, any disruption will be temporary for the duration of the construction phase of the project. The most impactful element of the works on the local road network is during the initial transport of groundworks machinery and delivery of fill materials. To mitigate these impacts, the CEMP includes a section on construction traffic management and prior to works commencing on site, the lead Contractor appointed to the project will be required to develop a detailed works-specific Construction Traffic Management Plan (CTMP), reflecting the specifics of their final site management and construction methodologies. To regularise the traffic movements within the applicant's site and on the approach to the proposed development, ensuring safety for all road users during the planned construction works the CEMP provides details on site operating hours, site access and outlines the risk management measures that should be undertaken by the appointed Contractor. Construction phase impacts relating to traffic are likely to be negative but temporary and not significant.

During operation no significant impacts as a result of traffic are anticipated. As detailed in the Traffic and Transport Assessment prepared by Waterman Moylan Consulting Engineers, the proposed development will not generate excessive vehicular traffic flows and can be

supported by the existing road infrastructure, as all junctions assessed will remain under capacity post construction of the proposed development and all other committed developments in the area. A Car Parking Rationale and Mobility Management Plan has also been prepared by Waterman Moylan Consulting Engineers. It is proposed to provide car and cycle spaces in line with best practice, as part of the application. The reduction of parking spaces aligns with an established trend to limit parking in urban developments with access to sustainable modes of transport. From a sustainable travel perspective, limiting vehicular parking spaces serves to force end users to adopt alternative travels modes, different to the single-occupant private car. Given the proximity of the proposed development to the proposed Metro Station and the Swords QBC, the development is classified as Zone 1 within the Fingal Development Plan 2017-2023, meaning the allowance for car parking spaces provided can be reduced substantially. Furthermore, based on the Guidelines for Planning Authorities, Design Standards for New Apartments (December 2020) due to the close proximity to the existing and future high-frequency public transport and cycling facilities, as well as the high public transport usage of existing similar developments, it is considered reasonable that the car parking ratio for the residential units can be reduced below the ratio preferred by Fingal County Council. This strategy therefore supports national transport policy and the objectives of the Fingal Development Plan 2017-2023.

The Risk of Accidents, having regard to Substances or Technologies Used

It is proposed that the risk of accidents, having regard to substances or technologies used, will be extremely low in this case, given the nature of the proposed development.

Location of the Proposed Development

In terms of the location of the proposed development, the guidance identifies three sub-criteria which should be considered in the context of the environmental sensitivity of geographical areas likely to be affected:

> *"The existing land use;*
>
> *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: Wetlands; coastal zones; mountain and forest areas; nature reserves and parks; areas classified or protected under legislation, including special protection areas designated pursuant to Directives 79/409/EEC[1] and 92/43/EEC[2]; areas in which the environmental quality standards laid down in legislation of the EU have already been exceeded; densely populated areas; and, landscapes of historical, cultural or archaeological significance."*

The topography of the site is relatively flat and has been surveyed to lie approximately between +57.50 metres above ordnance datum (AOD) at Northwood Road and +58.20 metres

[1] Council Directive on the conservation of wild birds

[2] Council Directive on the conservation of natural habitats and of wild fauna and flora

AOD at Northwood Park. The southern area of the land comprises shrub and trees, while the northern area of the site comprises a disused car park. In this regard, the proposed development of the site for residential and office purposes will accord with the mix of land uses (residential, commercial, office and retail uses) that characterises the wider area. It is not considered that the existing land use will be adversely affected in environmental terms by the proposed development.

The natural resources in the area of the subject lands will be unaffected by the proposed development.

The absorption capacity of the natural environment of the proposed development will be addressed in the assessments enclosed with the planning application, but this is considered good in terms of existing infrastructure provision being available to serve the site, with upgrading of elements of the Irish Water network to be agreed to facilitate the development, as standard. In visual terms, the proposed new build elements have been very carefully considered and sited by the scheme architects pursuant to a detailed architectural assessment and Landscape and Visual Impact Assessment of the surrounding site context and review of potential impacts.

In addition, the subject proposal is sensitively designed to ensure it respects adjoining development and seeks to minimise significant visual impact, where possible, through a combination of appropriate choice of materials and finishes and landscape design. It is considered that there is adequate absorption capacity to accommodate the scale of the proposed development in this particular location.

Furthermore, the areas noted above as requiring *'particular attention'* in terms of sensitivity will not apply to the subject lands including:

- Landscapes of historical, cultural or archaeological significance (n/a);
- Wetlands (n/a);
- Coastal zones (n/a);
- Mountain and forest areas (n/a);
- Nature reserves and parks (n/a);
- Areas in which the environmental quality standards laid down in legislation of the EU have already been exceeded (n/a); and
- Densely populated areas (n/a).

Characteristics of Potential Impacts

As previously outlined above, there are no *"significant effects"* associated with the proposed development, primarily due to its characteristics (being significantly below all of the appropriate thresholds) and location (substantially within the existing built context of an area characterised by a mix of apartments, offices, hotels and retail uses). Therefore, the issues which Schedule 7 and Schedule 7A lists as being important to have particular regard to, including, *inter alia, 'the extent of the impact (geographical area and size of the affected population)'* and *'the transfrontier nature of the impact'* are not considered relevant in this context.

Notwithstanding the above, detailed assessments will accompany the planning application that will provide a holistic and comprehensive analysis of the proposed development and an assessment of relevant potential planning and environmental impacts. Whilst not comprising an EIAR in the formal legal sense, which we contend is not required in respect of this proposal, the enclosed documents will provide the level of assessment required to an equivalent standard.

A brief summary of the inputs to be included with the application is set out below:

- *A description of the characteristics of the site location and description of development;*
- *An overview of the planning history of the lands and an examination of any issues arising;*
- *A detailed analysis of the relevant planning policy guidance at a strategic, regional and local level;*
- *A Site Layout Plan and Design Rationale, including CGI's and LVIA Photomontages;*
- *An Archaeological Assessment;*
- *A Landscape Rationale (including tree survey) and Masterplan;*
- *A Landscape and Visual Impact Assessment;*
- *A Daylight and Sunlight Assessment;*
- *An Ecological Impact Assessment, including Bat Survey;*
- *An Appropriate Assessment Screening;*
- *A Flood Risk Assessment;*
- *A Traffic and Transport Assessment including a DMURS Statement of Consistency and Car Parking Rationale and Mobility Management Plan.*

Collectively, it is envisaged that these assessments will provide a holistic and comprehensive analysis of the proposed development and its planning and environmental implications.

Article 299B (I)(b)(ii)(II)(C) of the *Planning and Development Regulations 2001 to 2021*

RSK, at the request of Kategale Ltd., have prepared a statement in accordance with Article 299B and C of the Planning and Development Regulations 2001 to 2021 in relation to the proposed Strategic Housing Development. The statement is to provide information and assist An Bord Pleanála in completing an examination for the purposes of a screening determination in accordance with Articles 299B and 299C of the Planning Regulations.

In particular, it is provided so that the Board may have regard to *"the available results, where relevant, of preliminary verifications or assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive"* in accordance with Article 299C(1)(a)(iv) of the Planning Regulations.

The statement summarises the assessments carried out the proposed development and identifies that there is no *"significant and realistic doubt in regard the likelihood of significant effects on the environment arising from the proposed development".* As a result of the statement, An Bord Pleanála is able to carry out their assessment in relation to Articles 299B and 299C of the Planning Regulations. Please refer to the enclosed Statement in Accordance with Article 299 B, prepared by RSK.

3.0 CONCLUSION

Collectively, it is envisaged that these assessments provide a holistic and comprehensive analysis of the proposed development and its planning and environmental implications.

We trust that this information fully addresses the issue of EIA screening and that, in this particular case, an EIAR is not required in respect of this development.

Yours faithfully

_____

Cheryl O'Connor
Senior Planner
Tom Phillips + Associates

Appendix A
EIAR Screening Checklist

Questions to be Considered For further guidance on factors to be considered see the more detailed questions listed in the **Scoping Guidance**	**Yes/ No/? Briefly describe**	**Is this likely to result in a significant impact? Yes/ No/?- Why?**
1. Will construction, operation, decommissioning or demolition works of the Project involve actions that will cause physical changes in the locality (topography, land use, changes in waterbodies, etc.)?	Yes. The development will comprise the provision of a high-density residential development (incl. office) and additional population on a currently vacant, undeveloped site. Thus, new land uses will be established on the site.	No. The adjoining area is characterised by a mixed of development (incl. apartments, office, hotels, retail, among others) and zoning designation for the site permits residential development in the statutory Development Plan for the area.
2. Will construction or the operation of the Project use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or are in short supply?	No. Whilst zoned serviced urban land is a scarce resource in Dublin, the proposed scheme will deliver a sustainable residential proposal that ensures the site will be efficiently used.	No.
3. Will the Project involve the use, storage, transport, handling or production of substances or material which could be harmful to human health, to the environment or raise concerns about actual or perceived risks to human health?	No, other than the small amounts typically used in residential households.	No.
4. Will the Project produce solid wastes during construction or operation or decommissioning?	Yes. A wide variety of non-hazardous waste will be generated during the construction phase. Typical waste types are listed within the CDWMP prepared by RSK.	No. Any waste arising during construction will be managed based on the Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Development Projects as detailed in the CDWMP.

5. Will the Project release pollutants or any hazardous, toxic or noxious substances to air or lead to exceeding Ambient Air Quality standards in Directives 2008/50/EC and 2004/107/EC)?	No. The development comprises a residential proposal that will not give rise to pollutants. All construction activities, will be subject to on-site management.	No. Standard dust mitigation measures will be integrated into the construction phase and it is considered that any impact would be temporary, neutral and not significant.
6. Will the Project cause noise and vibration or the releasing of light, heat energy or electromagnetic radiation?	Yes. There will be an increase in local noise and vibration emissions during the construction phase of the project.	No. Any impacts relating to noise and vibration will be short term, negative and not significant for the duration of the construction phase. Any impacts during operation of the proposed development will be negligible.
7. Will the Project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	Yes. During construction, construction activities have the potential to contaminate ground water, however this can be negated through mitigation measures.	No. As detailed in the CEMP prepared by Waterman Moylan Consulting Engineers, mitigation measures will be put in place to ensure there is no risk of contamination to of land or water.
8. Will there be any risk of accidents during construction or operation of the Project that could affect human health or the environment?	Yes. Construction sites pose potential risk to the health and safety of the public. In terms of the operational phase. The proposed development has been subject to comprehensive and robust assessments to ensure that the scheme will be delivered and managed to a very high standard in order to protect the residential amenities of the area.	No. Significant negative impacts on health and safety are not considered likely once mitigation measures are put into operation.
9. Will the Project result in environmentally related social changes, for example, in demography	No. The new residential development will add marginally to the local population but this is not deemed a significant impact.	No.

traditional lifestyles, employment?	No traditional lifestyles or employment will be affected as a result of this development.	
10. Are there any other factors that should be considered such as consequential development which could lead to environmental impacts or the potential for cumulative impacts with other existing or planned activities in the locality	Yes, however, the culmination of effects from the planned and permitted development and that currently proposed in the area would not be likely to give rise to significant effects on the environment. Please refer to Appendix B 'Summary of Potential Environmental Impacts'.	No.
11. Is the Project located within or close to any areas which are protected under international, EU, or national or local legislation for the ecological, landscape, cultural or other value, which could be affected by the Project?	No. This is confirmed in the assessments included with the planning application.	No.
12. Are there any other areas on or around the location that are important or sensitive for reasons of their ecology eg. Wetlands, watercourses or other waterbodies, the coastal zone, mountains, forests or woodlands that could be affected by the Project?	No. The site does not adjoin any environmentally sensitive areas as confirmed in the Appropriate Assessment Screening prepared by RSK enclosed with the planning application.	No.
13. Are there any areas on or around the location that are used by protected, important or sensitive species of fauna or flora eg. For	No. This is confirmed in the enclosed Ecological Impact Assessment prepared by RSK included with the planning application.	No. As concluded in the Ecological Impact Assessment prepared by RSK, the proposed development will not result in any significant impacts on any

breeding, nesting, foraging, resting, overwintering, migration which could be affected by the project?		of the identified key ecological receptors.
14. Are there any inland, coastal, marine or underground waters (or features of the marine environment) on or around the location that could be affected by the Project?	No. The site is not located in proximity to any inland or other waters that will be affected by this development.	No.
15. Are there any features of high landscape or scenic value on or around the location that could be affected by the Project?	No. The surrounding lands have not been designated as being of high landscape or scenic value.	No.
16. Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the Project?	No.	No.
17. Are there any transport routes on or around the location that are susceptible to congestion or which cause environmental problems, which could be affected by the Project?	No. The Transport and Traffic assessment enclosed confirms that the overall impact of the proposed development on the transportation infrastructure in the local area will be minimal.	No.
18. Is the Project in a location in which it is likely to be highly visible to many people?	Yes. As the proposed development ranges in height from 5 and 11 storeys it will be highly visible to many people when compared to the existing vacant nature of the site.	No. A Landscape and Visual Impact Assessment (LVIA) prepared by Áit Urbanism + Landscape Ltd. concludes that the proposed development will result in visual impacts that are slight and positive in the long term once all landscape works

		have been implemented and trees and planting have established.
19. Are there any areas or features of historic or cultural importance on or around the location that could be affected by the Project?	No. This is confirmed by the Archaeological Assessment prepared by IAC enclosed with the planning application.	No.
20. Is the Project located in a previously undeveloped area where there will be loss of greenfield land	No. The lands are currently undeveloped, albeit have been subject to some construction activity. Thus, the lands may be better classified as 'brownfield' and are not currently open to the public.	No. The lands have no amenity value at present being unavailable for public use.
21. Are there existing land uses within or around the location e.g. homes, gardens, other private property, industry, commerce, recreation, public open space, community facilities, agriculture, forestry, tourism, mining or quarrying that could be affected by the Project?	Yes. Surrounding land uses include a range of existing residential, commercial, office and retail use. The site immediately abuts Northwood Crescent, which accommodates 'The Crescent Building' office complex on its western boundary.	No. The subject development is carefully designed to ensure no adverse impacts on the amenities of these properties will arise.
22. Are there any plans for future land uses within or around the location that could be affected by the Project?	No. All existing land uses in the site vicinity are well established comprising a mix of uses, including residential, within Northwood.	No.
23. Are there areas within or around the location which are densely populated or built-up, that could be affected by the Project?	Yes. The site is located within an existing suburban area which has seen substantial change in recent years.	No. The subject development is carefully designed to ensure no adverse impacts on the amenities of these uses will arise.
24. Are there any areas within or around the location which are occupied by sensitive	No.	No.

land uses e.g. hospitals, schools, places of worship, community facilities that could be affected by the Project?		
25. Are there any areas within or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, that could be affected by the Project?	No.	No.
26. Are there any areas within or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, that could be affected by the Project?	No.	No.
27. Is the Project location susceptible to earthquakes, subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions e.g. temperature inversions, fogs, severe winds, which could cause the Project to present environmental problems?	No.	No.

Appendix B
Summary of Potential Environmental Impacts

This section refers to the likelihood of environmental impacts arising from the construction and operational phases of the proposed development. The table below provides a summary of any residual impacts arising from the proposed development.

Environmental Aspect	Summary of Environmental Impacts
Population and Human Health	Construction sites pose a potential risk to the health and safety of the public. Health & Safety issues will be the primary concern for the appointed contractor. This will apply in respect of persons working on the site and in respect of passing pedestrians, motorists or other transport carriers. In this regard, the highest possible care will be taken in providing a detailed Construction Stage Health and Safety Plan in advance of works commencing on site. The site will be closely managed on a day to day basis by construction site management. The CEMP prepared by Waterman Moylan Consulting Engineers proposes measures to mitigate any likely impacts associated with noise, dust or pollution from the construction process. The Construction and Demolition Waste Management Plan prepared by RSK proposes measures to ensure that the management of construction and demolition (C&D) waste at the site is undertaken in accordance with current legal and industry standards. The Construction Stage of the scheme is expected to result in an impact on the surrounding roads network primarily due to construction related deliveries and removals from site. Prior to works commencing on site, the lead Contractor appointed to the project will be required to develop a detailed works-specific Construction Traffic Management Plan (CTMP), reflecting the specifics of their final site management and construction methodologies. This plan shall be prepared in consultation with the Design Team, with Fingal County Council (FCC), and with An Garda Síochána, and shall be updated as required throughout the project. The principal objective of the CTMP is to proactively manage the impacts of all construction traffic related to the proposed development, upon both the public (off-site) and internal (on-site) environments. It shall aim to ensure that the safety of the public and of construction workers is maintained at all times, that disruptions are minimised, and that all operations are undertaken within a risk-controlled environment. It is noted that the impact of

	the construction works on the surrounding road network will be temporary in nature. The development will continue connect to existing public services for water and sewer infrastructure. No emissions other than from air conditioning and heating units are anticipated during operation. The proposed development has been subject to comprehensive and robust assessment which included, inter alia, a comprehensive architectural design appraisal, a Flood Risk Assessment, a Traffic Impact Assessment, a Construction and Environmental Waste Management Plan, and a Construction and Environmental Waste Management Plan, to ensure that the scheme will be delivered and managed to a very high standard in order to protect the residential amenities of the area. Significant negative impacts on health and safety are not considered likely once mitigation measures are put into operation.
Biodiversity	The likely ecological impacts associated with the proposed mixed-use development comprising a Build-To-Rent Strategic Housing Development, offices and all ancillary site development works on have been assessed by RSK. The enclosed Ecological Impact Assessment has focused on the potential outward impacts associated with the construction and operational phases of the proposed development. During the construction phase of the project, there will be some impact on habitats and species found within the site. • No priority habitats are anticipated to be affected by the development. Although the proposed development will lead to a loss the habitat types recorded on site (mixed broadleaved woodland, scrub, hedgerow, recolonising bare ground and artificial habitat), these are dominated by non-native species and are of low ecological value. Furthermore, mitigation measures such as post-work planting will minimise ecological impacts. The resultant residual ecological impact from this source will be one of negative, low, short-term impact. • Evidence of protected and priority species were recorded during the ecological survey and background data search. In summary the construction phase will affect potential

	nesting and foraging habitat for birds. However, mitigation measures will prevent significant adverse effects. For example, all vegetation removal should be undertaken prior to bird nesting season, and should vegetation removal be required between 1st March and 31st August a nest survey should be undertaken by a competent person. The resultant residual ecological impact from this source will be one of negative, moderate, short-term impact. During the operational phase of the project, there will be a direct and permanent impact on fauna due to the presence of roads/ pavement links. Therefore, fauna will be at risk from 'road kill' from vehicles entering/exiting the site. Residual impact significance will vary depending on speed regulations in place to aid animals to roam freely. It is concluded that provided the project is constructed and operated in accordance with the design, best practice and mitigation measures, it will not result in significant impacts on flora and fauna in the local environment.
Land, Soils, and Geology	In determining the impact of the proposed development on the prevailing geological conditions, key sources of information were consulted, including the Map of the Bedrock Geology of Ireland, along with information available from the EPA Maps website (gis.epa.ie), contained in the geotechnical site investigations carried out for the proposed development and information available from the Geological Survey of Ireland (GSI). An extensive site investigation (SI), prepared by Aecom was also carried out to investigate subsurface conditions within the proposed development site, and accompanies this submission. The underlying bedrock comprises dark-grey to black, fine-grained, occasionally cherty, micritic limestones that weather paler, usually to pale grey. There are rare dark coarser grained calcarenitic limestones, sometimes graded, and interbedded dark-grey calcar (Geological Survey of Ireland). As the soil and bedrock are relatively well drained, it is expected that most rainwater falling on the site would percolate to groundwater rather than flowing over land. The site does not form part of a geological heritage area. The proposed development may require the removal of some soil from the site to facilitate construction, however quantities required for removal are not considered to have the potential to

	result in any significant adverse impact. Any potential impacts will be identified at an early stage and avoided, managed and mitigated by the measures which form part of the CEMP, which accompanies this submission. Therefore, the proposed development will not have any unacceptable direct or indirect impacts in terms of land, soils and geology.
Hydrology & Hydrogeology	RSK have prepared a Hydrology & Hydrogeology Impact Assessment, which accompanies this submission. As detailed in the report, considering the nature of works associated with the proposed for the development and the location of the Site, temporary impacts on hydrology have the potential to occur during the construction phase of the works. Unmitigated, those impacts to water quality have the potential to have adverse impacts on surface water quality and ecological attributes associated with the receiving surface water bodies. Potential pollutants include; • Suspended Solids – Solids entrained in runoff or in pumped construction waters. • Hydrocarbon (e.g. diesel) • Waste Water Sanitation • Cementitious Material (e.g. concrete) Release of the above pollutants in receiving surface water bodies has the potential to have profound adverse impacts on water quality and associated ecological attributes. Hydrocarbons are the most significant risk to groundwater quality at the site during the construction phase of the development. The implementation of suitable control measures will ensure that the impact associated with the construction phase of the development is minimized. The anticipated residual impact from the construction phase of the development is considered to be mostly a low risk, neutral impact. Please refer to the Hydrology & Hydrogeology Impact Assessment for a full breakdown of impacts. Land sealing as a function of the operational phase of the development (constructed buildings and hardstands) and the reduction in recharge capacity will likely lead to a net increase in surface water runoff at the site, in turn leading to the catchment hydrological response to rainfall increasing and enhancing the risk of flooding at potential downstream flood risk receptors. The operational phase of the development will involve activities which will potentially lead to the release of pollutants including;

	hydrocarbons (fuel leaks) and waste water (leaking sewer). However, the likelihood of these environmental incidents occurring is very low compared to that of construction activities, therefore the risk of adverse impacts is considered relatively low. The implementation of suitable control measures will ensure that the impact associated with the operational phase of the development is minimized. The anticipated residual impact from the operational phase of the development is considered mostly to be a low risk, neutral Impact. Please refer to the Hydrology & Hydrogeology Impact Assessment for a full breakdown of impacts.
Air and Climate	Information on air quality was accessed from the EPA website and interactive map viewer. The EPA air quality index identifies that the site is located within an area where the air quality is rated as *"3 -Good"* and the burning of coal is restricted. Santry is located in Air Zone C. In terms of dust nuisance during the construction phase, the site is surrounded by existing residential development. Standard dust mitigation measures will be integrated into the construction phase and it is considered that any impact would be temporary, neutral and not significant. RSK Engineering and Environmental Consultancy have prepared a Dust Management Plan, which accompanies this submission.
Noise and Vibration	There will be an increase in local noise and vibration emissions during the construction phase of the project, however the effects will be negative but temporary and are not considered likely to result in significant impacts. Construction activities will occur during daylight hours and noise limits are not expected to exceed limits set out in best practice guidance, or as conditioned by the planning authority. The proposed development will introduce some additional traffic onto public roads in the locality of the site. The lack of a significant increase in post development site-generated traffic means that the impact in relation to noise from vehicles on public roads will be negligible. Any impacts relating to noise and vibration will be short term, negative and not significant for the duration of the construction

	phase. Any impacts during operation of the proposed development will be negligible.
Landscape and Visual	Ait Urbanism + Landscape Ltd. have completed an LVIA, which accompanies this submission. As detailed in the report, following the visual assessment of the twenty-nine photomontages prepared by Sketchrender, the overall visual impact during construction works will be significant, negative but short-term. Implementation of best practice during constructions works will assist in reducing negative impacts at the construction stage of the project. These negative impacts will cease once construction works are complete and the proposed development is opened and occupied. Of the twelve medium to long range views, the proposed development will not be visible in any of them. In these views, the proposed development will be obscured by the intervening built environment, vegetation, and distance from the viewer. Of the seventeen short to medium distance views, the proposed development will be visible in fourteen of them. In these views, the development has the most visual impact within View 4, View 6, View 8, View 9, and View 15. In the cases of View 15, 8, and 6, the proposed development will have a noticeable but positive impact on the receiving environment without affecting its sensitivities. In View 4, the proposed development will have a noticeable and neutral impact on the receiving environment without affecting its sensitivities. In View 9, the proposed development will have a neutral impact on the receiving environment and the change will be consistent with existing and emerging trends occurring within that environment. On this basis, it is anticipated that the presence of a sensitively designed, high-quality, mixed-use development in combination with the landscape proposals within and around the boundaries of the scheme, will reduce the visual impacts to slight and positive in the long term once all landscape works have been implemented and trees and planting have established.
Cultural Heritage	An Archaeological Assessment has been carried out by IAC Ltd. and is enclosed with this application. There are no previously identified archaeological monuments/features located within, or in the immediate environs of, the subject development lands, with the nearest recorded monument comprises Santry House (DU014-030), an 18th/19th century house site, c. 610m to the east. The historic mapping indicates that the site lay mostly within a wooded area, known as Black Wood, in the centre of the demesne throughout the 19th

	century. No features of archaeological potential were noted by cartographic and aerial photographic research and no surface features/traces of archaeological potential were noted by the surface reconnaissance survey. There are no structures listed in the Record of Protected Structures (RPS) of the *Fingal Development Plan 2017 – 2023* as being located within, or in the immediate environs of, the subject proposed development lands. Cumulative impacts are not anticipated, and it is envisaged that there will be no impacts during operational phase.
Microclimate; Daylight and Sunlight	A Wind and Microclimate report has been prepared by EDS and accompanies this submission. The report concludes that the mitigation techniques proposed are effective in controlling the velocity of air moving between structures in the proposed Northwood development. Consequently, it is established that communal podium areas will not experience prolonged high velocity wind in normal Dublin weather conditions. A Daylight and Sunlight Report has been prepared by 3D Design Bureau and accompanies this submission. The report concludes that the proposed amenity areas for the development would all be compliant with the BRE Guidelines with regard to sunlight. This assessment studied 4 amenity spaces, as well as the play area for the creche. More than half the area of each proposed amenity space would be able to receive more than 2 hours of sunlight on March 21st. All 688 no. habitable rooms across the development were assessed for daylight access. The ADF in all of the assessed spaces would reach the recommended minimum value as stated by the BRE Guidelines. The LKDs were assessed with a recommended minimum value of 2.0% and with a reduced target value of 1.5%. In both instances, the compliance rate of the scheme would be 100%. Due to the location of the subject site, some adverse affects were incurred by the neighbouring properties. The proposed development is planned for a site in a sub-urban, brownfield location adjacent to significant office, retail and residential developments. It is zoned for further mixed-use development, and is intended to integrate with the urban centres of Swords and Ballymun to the east and west respectively. The subject site is intended for significant densification and integration with neighbouring urban centres. The majority of the windows that were studied sustained an imperceptible level of effect. It should

	be noted that the balcony configuration of the neighbouring Lymewood Mews development creates an exaggerated effect to the windows, due to the additional obstructions resulting from the overhang and (where applicable) flank walls. Approximately 91% and 95% of the windows would sustain an imperceptible level of effect to their annual and winter probable sunlight hours, respectively.
Material Assets: Traffic and Transport	A Traffic and Transport Assessment (TTA) has been prepared by Waterman Moylan Consulting Engineers and accompanies this submission. The study assesses the impact of the proposed development on the local road network during the operational stage of the development. Junction analyses to assess the effects of traffic generated by the proposed development have been undertaken for 6 no. key existing and proposed junctions on surrounding the site. The TTA states that Junction 1 and Junction 6 are below the 5% threshold and therefore no further assessment is required. The other five junctions have at least one Peak hour Period over 5% so therefore further junction assessment is required. Following further assessment, it is concluded that the remaining 5 junctions will remain under capacity for the future year 2041 (Opening year + 15 Years). It is therefore considered that the proposed development will have a negligible impact on the junctions assessed. The proposed development will impact on the surrounding roads network for the construction phase of development. To minimise disruption to the local roads network during the construction phase the following measures are proposed: • Securely fencing off the site from adjacent properties, public footpaths and roads during the pre-construction phase; • Providing signage on the surrounding road network to define the access and egress routes for the development; • Strictly controlling the traffic generated by the construction phase of the development in order to minimise the impact of this traffic on the surrounding road network; • Adequately signposting and enclosing all road works to ensure the safety of all road users and construction personnel; • Accommodating all unavoidable personnel and visitor vehicle parking demands on-site or within designated off-site parking areas; • Implementing a programme of street cleaning as required;

	• Making arrangements to facilitate the delivery of abnormal loads to the site; and • Implementing measures to avoid queuing of construction traffic on the adjoining road network. Prior to commencement of works, a Construction Stage Traffic Management Plan will be developed in consultation with Fingal County Council Roads & Transportation Department. The plan will identify haulage routes, work hours, site staff parking and welfare facilities as well as details of the site compound. Measures to mitigate any potential noise, air quality and dust/mud resulting from construction stage activities will be detailed.
Material Assets: Waste	A Construction Demolition Waste Management Plan (CWMP) has been prepared by RSK and accompanies this planning application. The construction and demolition stage of the project will generate a range of non-hazardous and hazardous waste materials. The construction and demolition phase may lead to some short-term storage of waste on site pending collection from a licensed waste contractor. This has the potential to cause short-term adverse impacts such as odour, dust and human health and safety impacts. Mitigation to overcome and minimise some of these impacts will follow best practice advice in the CWMP states that all waste is classified, segregated, stored, monitored, handled and disposed in a way that will not impact negatively on workers as well as on water and soil environments, both on site and off-site. Provided the mitigation measures outlined are followed, the residual effect of the construction phase on the environment will be likely, neutral, short term and imperceptible. The provision of new apartments and offices means that the generation of waste materials during the operational phase is unavoidable. It is likely to lead to a long-term increase in waste generation in the area. Networks of waste collection, treatment, recovery and disposal infrastructure are in place in the region to manage waste efficiently from this type of development. Waste which is not suitable for recycling is typically sent for energy recovery. There are also facilities in the region for segregation of municipal recyclables which is typically exported for conversion in recycled products. The waste materials generated daily will be stored in dedicated waste storage area(s) will be outlined in an operational WMP, which will be completed prior to construction.

	During the operational phase, a structured approach to waste management as set out in operational CWMP will promote resource efficiency and waste minimisation. Provided the mitigation measures are implemented and a high rate of reuse, recycling and recovery is achieved, the predicted impact of the operational phase on the environment will be a likely, long-term, neutral and imperceptible effect.
Material Assets: Built Services	All built services and infrastructure connections and capacity is has been reviewed by Waterman Moylan Consulting Engineers as part of the planning application. In determining the impact of the proposed development on the utilities a pre-connection enquiry has been submitted to Irish water. A Confirmation of Feasibility letter issued by Irish Water is enclosed which confirms that there is adequate capacity in their water supply network and wastewater systems to accommodate the proposed development. Consequently, there are no cumulative impacts predicted. An analysis of the Gas Network Ireland, Eir and ESB network maps have also been completed. All works on the respective networks and infrastructure will be carried out in accordance with the relevant Bodies guidelines. It is anticipated that any potential impacts identified can be avoided, managed and mitigated by the measures included as part of proposed scheme and through suitable conditions. The proposed development will therefore not have any unacceptable direct or indirect impacts in terms of Material Assets: Built Services.

Table (b) – Summary of Residual Impacts arising from the Proposed Development