



ENVIRONMENTAL IMPACT ASSESSMENT SCREENING REPORT

PROPOSED RESIDENTIAL DEVELOPMENT AT STRADBROOK ROAD,
MOUNTASHTON, BLACKROCK, CO. DUBLIN



PREPARED FOR:

**Tetrarch Residential
Limited**

PREPARED BY:

Tom Phillips + Associates
80 Harcourt Street
Dublin 2
D02 F449



JULY 2022

EIA SCREENING IN RESPECT OF PROPOSED STRATEGIC HOUSING DEVELOPMENT (SHD) AT STRADBROOK ROAD, MOUNTASHTON, BLACKROCK, CO. DUBLIN

1.0 INTRODUCTION

This EIA Screening Assessment has been prepared to aid An Bord Pleanála's determination in respect of the necessity or otherwise for an Environmental Impact Assessment ("EIA") to be carried out and an Environmental Impact Assessment Report ("EIAR") to be prepared in respect of the proposed Strategic Housing Development (SHD) for 108 No. units at Stradbroke Road, Mountashton, Blackrock, Co. Dublin.

1.1 Development Introduction

The proposed mixed-use development at a site of some 0.4813 ha on Stradbroke Road, Mountashton, Blackrock, Co. Dublin will comprise: the demolition of the existing Stradbroke House and adjoining surface car park, and the construction of: 108 No. Build-to-Rent residential senior living apartments (83 No. 1-bed apartments and 25 No. 2-bed apartments), with balconies / winter gardens provided for all units, across 2 No. blocks ranging between 3 to 7-storeys over basement with set back at sixth-floor level.

The proposal also includes for 148 No. secure bicycle parking spaces, 55 No. underground car parking spaces, a two-way vehicular and cyclist entrance ramp, and bin storage, circulation areas and associated plant at basement level; a self-contained office unit, a residential staff management suite, resident's facilities, residents' communal amenity rooms, and residents' communal open space, as well as 13 No. surface car parking spaces (incl. 1 No. accessible commercial car parking space and 12 No. car parking spaces for use by the adjoining creche (incl. 1 No. accessible)), 24 No. secure cycle spaces within separate bike store, separate bin store for office use, 30 No. short-term bicycle parking spaces, and 3 No. ESB substations at ground floor level; additional communal amenity rooms at first, second and third floor levels; roof gardens / terraces at third, fourth and sixth-floor levels; green roofs; and PV panels on third, fourth and sixth-floor roof-level; amendments to existing boundary wall to provide new vehicular and pedestrian entrances; provision of security gates; and associated site landscaping, boundary treatments, lighting and servicing, and all associated works above and below ground.

2.0 CONTEXT OF THIS EIA SCREENING

2.1 Overview of EIA Requirements

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

Various types of projects and associated thresholds are defined in the Directive to classify whether a project is or is not likely to have a significant effect. These are set out as Annex I



and Annex II. Annex I projects require mandatory EIA. Annex II projects require EIA if the project exceeds the threshold set by individual Member States and significant effects are likely.

The latter is established in two ways:

- Classes of project and associated thresholds whereby ‘significant effects’ are triggered
- Sub-threshold projects that are likely to have “significant effects on the environment” – Annex III sets out criteria whereby significance of effects is assessed.

Member States are given a certain amount of discretion in respect of establishing thresholds / criteria by which Annex II projects will be required to undergo EIA.

It is noted, however, per Article 2(a)(1) of the 2014 EIA Directive, that projects should be subject to EIA if, arising from their nature, size, or location, they are likely to have significant effects on the environment.

Article 1(2) of the Directive defines “project” as:

“the execution of construction works or of other installations or schemes, other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources”.

Annex II projects are transposed into the Irish Planning Code by Schedule 5 Part 2 and Schedule 7 of the *Planning and Development Regulations 2001-2022* (as amended). Directive 2014/52/EU was transposed into *The European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018* (S.I. No. 296 of 2018) on 1st September 2018.

2.2 2014 Directive

The 2014 Directive has redefined EIA as a process, whereby an Environmental Impact Assessment Report is a key informing element (this replaces the previous Environmental Impact Statement – EIS). Among the key changes introduced by the 2014 Directive are the following:

- Additional environmental factors to be considered (e.g. population and human health)
- More stringent screening procedures (e.g. Annex III)
- Maximum timeframes set for responses to scoping requests
- Environmental Impact Statement (EIS) replaced by Environmental Impact Assessment Report (EIAR)
- EIAR must be prepared by competent experts

As noted above, the transposition of the EIA Directive into Irish Planning Codes has been completed and *The European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018* (S.I. No. 296 of 2018) transposes the requirements of the 2014 EIA Directive into existing planning consent procedures.



3.0 SCREENING

Given the nature, location, and scale of the project, the project does not fall into any of the categories or project types listed in Annex I. The project is assessed under Annex II / Part 2, and Annex III / Schedule 7. The pertinent references from Schedule 5 of PDR, 2001, as amended by *The European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018*, are as follows:

3.1 Part 2 Class 10 – Infrastructure Projects

In particular, subsection 10(b)(i):

“Construction of more than 500 dwelling units”

Comment

The subject proposal comprises a proposed residential development located in Kilcullen, Co. Kildare. The proposed development will comprise some 108 No. residential units (incl. 83 No. 1-bed units and 25 No. 2-bed units (total residential unit GFA proposed: c. 12,682 sqm).

The proposal also includes a commercial / office unit (c. 175 sqm), and a network of communal open spaces (c. 1,327 sqm).

The proposal provides for 108 No. residential units which is substantially below the mandatory EIA threshold of 500 units. Therefore, as the total number of dwellings remains under 500 no., it is considered that a mandatory EIA is not required.

Conclusion – EIA NOT REQUIRED

3.2 Part 2 Class 10 – Infrastructure Projects

In particular, subsection 10(b)(iv):

“Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere”

(In this paragraph, “business district” means a district within a city or town in which the predominant land use is retail or commercial use.)”

Comment

The subject proposal comprises urban development within ‘*other parts of a built-up area*’, which provides a threshold of 10 hectares in order to trigger a mandatory EIA. The subject site is c. 0.4813 ha. which is below the 10 hectare threshold and also below the 2 hectare threshold for a business district, therefore EIA is not triggered by the site area.

Conclusion – EIA NOT REQUIRED



3.3 Part 2 Class 15

“Any project listed in this Part which does not exceed a quantity, area or other limit specified in this Part in respect of the relevant class of development but which would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.”

Comment

It is considered that the subject proposal comprises a development type which is listed within Part 2 but does not exceed the specified limits, and is therefore considered to be a ‘sub threshold’ development. Therefore, notwithstanding that the development does not trigger a mandatory EIA, it is considered prudent to investigate if the proposal would be likely to have significant effects on the environment thus requiring a sub-threshold EIA. This is examined in more detail in Section 3.4 of this Screening Report.

Conclusion – SUB THRESHOLD EIA MAY BE REQUIRED

SUMMARY

TYPE / CLASS	SUMMARY	COMMENT	EIA REQUIRED?
Part 2 Class 10(b)(i)	<i>Construction of more than 500 dwellings</i>	Proposal involves construction of 108 no. dwellings	NO
Part 2 Class 10(b)(iv)	<i>Urban development on area greater than 10 ha in built-up area</i>	Site area is c.0.9 ha.	NO
Part 2 Class 15	<i>Any project not meeting thresholds of Part 2 but would still be likely to have significant environmental impacts having regard to criteria in Schedule 7</i>	Proposal should be examined with regard to potential significant impacts on the environment	REQUIRES FURTHER ASSESSMENT

3.4 Sub Threshold Screening

At the outset it is noted that the 2014 Directive requires the following:

In order to ensure a high level of protection of the environment and human health, screening procedures and environmental impact assessments should take account of the impact of the whole project in question, including, where relevant, its subsurface and underground, during the construction, operational and, where relevant, demolition phases.

Schedule 5 Part 2 Class 10 (b) (i) and (iv) may or may not be triggers for EIA depending on whether the development would be likely to have significant effects on the environment, by reference to the criteria of Schedule 7.



For the purposes of this screening, the updated criteria set out in Schedule 7 and Schedule 7A of the Planning and Development Regulations, 2001 – 2020 (as amended) will be considered. The following section assesses the proposed development as per the information required under Schedule 7A:

1. A description of the proposed development, including in particular—

(a) a description of the physical characteristics of the whole proposed development and, where relevant, of demolition works, and

(b) a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.

2. A description of the aspects of the environment likely to be significantly affected by the proposed development.

3. A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from—

(a) the expected residues and emissions and the production of waste, where relevant, and

(b) the use of natural resources, in particular soil, land, water and biodiversity.

4. The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7.

1. CHARACTERISTICS OF THE PROJECT

The characteristics of the project must be considered with particular regard to be given to:

Criteria	
(a) the size and design of the whole project;	<p>The subject proposal comprises a proposed residential development located on an infill site, and will comprise 108 No. residential units arranged in 2 No. Blocks ranging in height from 3 to 7 storeys with an additional set-back storey, comprising 83 No. 1-bed apartments and 25 No. 2-bed apartments. Car and cycle parking is provided at surface and basement level. Vehicular access to the site will be from Stradbroke Road.</p> <p>The site is some 0.4813 ha. The size of the site (significantly below EIA thresholds) and design of the project is not likely to cause significant effects on the environment.</p>



<p>(b) cumulation with other existing and/or approved projects;</p>	<p>The proposed development is located within an established residential area. The assessments undertaken as part of this project have been informed by the site's surrounding context. There are no recent significant permissions for large residential developments within close proximity to the site.</p> <p>Accordingly, there is no real likelihood of significant effects on the environment arising from cumulation with other existing and/or approved projects.</p>
<p>(c) the use of natural resources, in particular land, soil, water and biodiversity;</p>	<p>The site comprises an existing two-storey commercial office building and a car parking area. The proposed development will require the removal of some soil from the site to facilitate basement construction, however quantities required for removal are not considered to result in any significant adverse impact.</p> <p>There will be some removal of existing landscape design features, such as managed hedges and trees, which will be appropriately compensated by the tree planting to take place as part of the overall landscaping plan for the development.</p> <p>A comprehensive landscaping plan has been prepared by Murrays Landscape Architects and provides for a range of new planting and communal open spaces which will provide the opportunity to support new habitats on the site.</p> <p>No significant effects arising from the use of land, soil or water are anticipated.</p>
<p>(d) the production of waste;</p>	<p><i>A Construction & Demolition Waste Management Plan</i> has been prepared by CS Consulting.</p> <p>That document confirms that construction waste will be disposed of using licensed waste disposal facilities and contractors.</p> <p><i>An Operational Waste Management Plan</i> is included within that document also.</p> <p>During operation, household and commercial waste will be disposed of by licensed waste disposal contractors.</p> <p>Stormwater Drainage</p> <p>The development will incorporate the principles of Sustainable Urban Drainage Systems (SuDs). The development is to retain storm water volumes</p>



	<p>predicted to be experienced during extreme rainfall events by use of a proposed attenuation system.</p> <p>Green roof technology, permeable paving and waterbutts will all be used to serve both attenuation zones of the development. The restricted flows from the attenuation system will then discharge to the existing stormwater network, after passing through an oil separator located at the end of the storm water network, in the basement car park.</p> <p>Foul Water Strategy</p> <p>The proposed development shall require a new 225 mm foul sewer to traverse Stradbrook Road from the Subject Site to the existing Irish Water manhole some 85 m north. In discussions with Irish Water, they confirmed that they will carry out the entirety of these external works, with the respective costings agreed in the future connection agreement made between Irish Water and the Applicant once planning permission is secured.</p> <p>Although the proposed building will generate a larger volume of effluent than the existing, the proposed building will incorporate a storm water attenuation system (as referenced above) which will restrict the volume of stormwater entering the public drainage network during periods of extreme rainfall. The overall result will be that while the foul component of the effluent from the new building will be greater than the existing, the percentage of storm water will be greatly reduced giving an overall net benefit in terms of reducing the hydraulic pressure placed on the Local Authorities public system.</p> <p>The production of waste is not likely to cause significant effects on the environment.</p>
<p>(e) pollution and nuisances;</p>	<p>Best practice methods, including appropriate site set-up, wheel-washing, and the use of high-capacity bunds, will be utilised during construction to mitigate potential impacts from pollution on the local environment during construction.</p> <p>There will be some potential for short-term noise and vibration impacts during construction, and prevention measures to reduce nuisance will be set out in the <i>Construction Management Plan</i> and the <i>Demolition and Construction Waste Management Plan</i>, both</p>



	<p>prepared by CS Consulting, which accompany this planning application.</p> <p>Significant effects are unlikely to arise.</p>
<p>(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;</p>	<p>Best practice construction measures, including appropriate site set-up, wheel-washing, and the use of high-capacity bunds, will be employed throughout the construction phase. It should be noted that the subject lands are not proximate to any Seveso site.</p> <p>A Site Specific Flood Risk Assessment (FRA) has been prepared by CS Consulting Group and accompanies this planning application. The FRA demonstrates that the site is located within Flood Zone C which are lands which have a '<i>Low Probability of Flooding</i>'. The overall flood risk is considered low.</p> <p>The proposed development has been designed to account for the potential impact of climate change. Proposed surface water design allows for a 20% increase in rainfall intensities. Significant effects are not anticipated.</p>
<p>(g) the risks to human health (for example due to water contamination or air pollution).</p>	<p>Foul water will discharge to the existing public sewer. Surface water will discharge to the existing surface water sewer network and attenuation tank.</p> <p>No impact on air quality is envisaged due to the nature and scale of the project.</p>

2. LOCATION OF THE PROJECT

The environmental sensitivity of geographical areas likely to be affected by projects must be considered, with particular regard to:

Criteria	
<p>(a) the existing and approved land use;</p>	<p>The subject site is zoned 'Objective E – To provide for economic development and employment. 'Residential' is listed as an 'Open for Consideration' use under this zoning objective.</p>
<p>(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;</p>	<p>The site comprises an existing two-storey commercial office building and a car parking area.</p> <p>The proposal will require the removal of existing landscape design features, such as managed hedges and trees, and material to facilitate block</p>



	and basement construction, however significant effects are not envisaged.
<p>(c) the absorption capacity of the natural environment, paying particular attention to the following areas:</p> <p>(i) wetlands, riparian areas, river mouths;</p> <p>(ii) coastal zones and the marine environment;</p> <p>(iii) mountain and forest areas;</p> <p>(iv) nature reserves and parks;</p> <p>(v) areas classified or protected under national legislation; Natura 2000 areas designated by Member States pursuant to Directive 92/43/EEC and Directive 2009/147/EC;</p> <p>(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;</p>	<p>Restricted flows of surface water will drain by gravity to the existing surface water network or directly into the proposed attenuation system on site.</p> <p>A <i>Natura Impact Statement</i>, prepared by Altemar, has been submitted as part of this Planning Application. That NIS concludes that, while there are potential pathways to Dublin Bay SAC – via construction vehicle treading materials from the site to the public road and thus onto the surface water network – however, with the mitigation measures, including appropriate site set-up, wheel-washing, and the use of high-capacity bunds, incorporated into the <i>Construction Environmental Management Plan</i> (also submitted), it is not considered that there will be any residual effects.</p> <p>The proposed development site is not within or directly connected to any mountain or forest areas.</p> <p>The proposed development is not within or directly connected to any nature reserves or parks.</p> <p>The Subject Proposal includes a full Natura Impact Statement, prepared by Altemar Consulting. That document confirms that XXX</p> <p>The site is not located within such an area.</p>



3. TYPE AND CHARACTERISTICS OF THE POTENTIAL IMPACTS

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

Criteria	
(a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected); (b) the nature of the impact;	The proposal relates to an existing built-up site in an established residential area. During the construction phase, the proposal will have a moderate impact in terms of noise, vibration and traffic on the local population. Measures outlined within the enclosed CEMP will ensure that these impacts are further minimised.
(c) the transboundary nature of the impact;	There are no transboundary impacts.
(d) the intensity and complexity of the impact;	No impacts of significant complexity or intensity are foreseen.
(e) the probability of the impact;	The impacts are likely to occur, however are not considered to be significant. We refer to the EclA, the TVIA, the <i>Transportation Assessment Report</i> , and the <i>Stormwater Audit</i> , all submitted as part of this SHD Planning Application. Each, respectively, predicts that insignificant impacts are likely on the environment, the built landscape, the local transportation network and the local drainage network as a result of the proposed development. The NIS submitted concludes that there will be no likely impact on Protected Sites.
(f) the expected onset, duration, frequency and reversibility of the impact;	Some temporary disruption may occur during the construction phase. The ecological value of the site will be retained at operational stage as a result of proposed landscaping enhancements and communal open spaces.
(g) the cumulation of the impact with the impact of other existing and/or approved projects;	It is considered that cumulative impacts with other existing and/or approved projects are not likely to cause significant effects on the environment given the scale of development identified and proximity of these to the subject site. We refer to Section 2.2 of the submitted <i>Planning Report</i> , which details the Planning History of the site and surrounding sites.
(h) the possibility of effectively reducing the impact.	In overall terms, the impact of the project will be positive as the proposed development will minimise negative impacts whilst delivering a significant



	number of residential units on appropriately zoned lands.
--	---



Questions to be considered per Annex III of Directive 2014/52/EU	Yes / No / ? . Briefly describe	Is this likely to result in a significant effect? Yes/No/? – Why?
1. Will construction, operation or decommissioning of the Project involve actions, which will cause physical changes in the locality (topography, land use, changes in waterbodies, etc)?	Yes It will involve the construction of 108 No. apartments on a currently underutilized site.	No The construction phase of the project will have some temporary impacts in the immediate locality, and there will be long term impacts in terms of land use and visual impact / physical changes in the locality following completion of construction. It is considered that the operation of a <i>Construction Environmental Management Plan</i> will limit any short term construction impacts. Long term land use and visual impacts are considered to be positive in nature due to the urban character of the local context, the commitment to landscape design management and associated visual mitigation throughout the site, and the delivery of a significant number of units on a site zoned for residential uses.
2. Will construction or operation of the Project use natural resources such as land, water, materials or energy, especially any resources which are nonrenewable or in short supply?	Yes The proposed development will use land and construction materials.	No The construction materials will have to be imported. While some of these materials are non-renewable, they are not in short supply. No significant effects on the environment are anticipated.
3. Will the Project involve use, storage, transport, handling or production of substances or materials, which could be harmful to human health or the environment or raise concerns about actual or perceived risks to human health?	Yes Some materials used in construction, e.g. concrete, stone, bituminous pavement, etc. could be harmful if released into the environment.	No The development will be constructed in accordance with best practice and specific controls will be put in place to manage hazardous materials.
4. Will the Project produce solid wastes during construction or operation or decommissioning?	Yes Waste will be generated during the construction and operational phases.	No The construction process will result in some generation of waste which will be disposed of in accordance with the provisions of the <i>Construction & Demolition Waste Management Plan</i> , prepared by CS Consulting. It is not anticipated that there will be any significant effects on the environment. Operational phase waste will be domestic in nature. Waste will be disposed of by a licensed waste contractor.



<p>5. Will the Project release pollutants or any hazardous, toxic or noxious substances to air?</p>	<p>Yes Release of air pollutants as a result of construction and vehicular construction traffic.</p>	<p>No The development will be constructed in accordance with best practice and specific controls will be put in place to manage the release of pollutants, particularly dust management practices. Dust prevention measures shall be included for control of any site airborne particulate pollution. Prior to commencement the contractor shall draw up an Air Quality Mitigation Plan for demolition, excavation and construction works which shall be constantly monitored during the lifetime of the works. If air quality targets set out in the plan are constantly exceeded the contractor shall cease that activity causing the dust and implement alternative working methods.</p> <p>The Contractor shall provide dust sampling points. The plan layout of the monitoring stations shall be submitted to DLR Co Co for agreement by the contractor. Monitoring data shall be compiled into monthly technical reports by the contractor and maintained on site.</p> <p>The Contractor shall monitor dust levels in the vicinity of the site using a Bergerhoff gauge instrument or in accordance with DLR Co Co Planning conditions. Records shall be kept of such monitoring for review by the Planning Authority. The minimum criteria to be maintained shall be the limit for Environmental Protection Agency (EPA) specification for licensed facilities in Ireland, which is 350mg/m²/day.</p>
<p>6. Will the Project cause noise and vibration or release of light, heat energy or electromagnetic radiation?</p>	<p>Yes Noise and vibration will be generated during construction phases.</p>	<p>No The development will be constructed in accordance with best practice and specific controls will be put in place to manage noise and vibration during the construction phases. Transport of construction materials will be necessary but will be subject to normal conditions and working hours to protect existing residential amenity.</p>
<p>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?</p>	<p>Yes During the construction stage there is potential for polluting matter to enter onto land, water and ground water.</p>	<p>No During construction, standard preventative measures to avoid any impacts on the local ground and/or surface and ground water environment.</p>
<p>8. Will there be any risk of accidents during construction or operation of the Project, which could affect human health or the environment?</p>	<p>Yes During the construction stage there is a potential for accidents that could affect human health or the environment.</p>	<p>No Standard preventative measures are provided as part of the project, which will be carried out in accordance with best practice; and specific controls will be put in place to manage risks.</p>



<p>9. Will the Project result in social changes, for example, in demography, traditional lifestyles, employment?</p>	<p>Yes It will involve the construction of 108 No. residential units.</p>	<p>No There will be an increase in population within the area. However, given the existing built-up residential character of the area, it is considered that the proposal is consistent with existing land uses and will not result in significant impacts.</p>
<p>10. Are there any other factors, which should be considered such as consequential development, which could lead to environmental effects or the potential for cumulative impacts with other existing or planned activities in the locality?</p>	<p>No .</p>	<p>No There are no significant developments permitted within close proximity to the site. The subject development has been assessed with regard to potential environmental impacts and no significant impacts are likely.</p>
<p>11. Are there any areas on or around the location, which are protected under international or national or local legislation for their ecological, landscape, cultural or other value, which could be affected by the project?</p>	<p>No</p>	<p>Yes A <i>Natura Impact Statement</i>, prepared by Altemar, has been submitted as part of this Planning Application. That NIS concludes that, while there are potential pathways to Dublin Bay SAC – via construction vehicle bringing materials from the site to the public road and thus onto the surface water network – however, with the mitigation measures incorporated into the <i>Construction Environmental Management Plan</i> (also submitted), it is not considered that there will be any residual effects.</p> <p>The <i>Townscape and Visual Impact Assessment</i> prepared by Macroworks and submitted as part of this Planning Application concludes that, despite being located close to 2 No. protected structures, the design of the proposed development “prevents the development from unduly imposing on the setting of protected heritage structures in the vicinity; ‘Wynberg’ to the north, ‘Rockford Manor’ across Stradbroom Road to the west, and Windsor to the south, which are already nestled in an eclectic suburban townscape fabric.”</p>
<p>12. Are there any other areas on or around the location, which are important or sensitive for reasons of their ecology, e.g. wetlands, watercourses or other waterbodies, the coastal zone, mountains, forests or woodlands, which could be affected by the project?</p>	<p>No</p>	<p>No This planning application is supported by a full <i>Ecological Impact Assessment</i>, supported by a bat survey.</p> <p>The EclA concludes that: “No significant environmental impacts are likely in relation to the construction or operation of the proposed development.”</p>



<p>13. Are there any areas on or around the location which are used by protected, important or sensitive species of fauna or flora e.g. for breeding, nesting, foraging, resting, overwintering, migration, which could be affected by the project?</p>	<p>No</p>	<p>No</p> <p>The EclA notes that:</p> <p>“No rare birds or bird species of conservation value (red or amber listed) were noted during the field assessment.”</p> <p>A full assessment has also been undertaken in respect of bats, included within the EclA. The conclusions of the survey works are as follows: <i>“The impact of the proposed development on bats will be minor negative/site/not significant in the long term based on the successful implementation of the lighting design and landscape strategy.”</i></p> <p>In terms of bats, we further note that the project ecologist liaised closely with the M+E engineers to ensure the proposal of bat sensitive lighting across the scheme.</p>
<p>14. Are there any inland, coastal, marine or underground waters on or around the location, which could be affected by the project?</p>	<p>No</p>	<p>Yes</p> <p>A <i>Natura Impact Statement</i>, prepared by Altemar, has been submitted as part of this Planning Application. That NIS concludes that there are potential pathways to Dublin Bay SAC – via construction vehicle treading materials from the site to the public road and thus onto the surface water network – however, with the mitigation measures incorporated into the <i>Construction Environmental Management Plan</i> (also submitted), it is not considered that there will be any residual effects.</p>
<p>15. Are there any areas or features of high landscape or scenic value on or around the location, which could be affected by the project?</p>	<p>No</p>	<p>No</p>
<p>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?</p>	<p>No</p>	<p>No</p> <p>The adjoining Blackrock RFC grounds are accessed via the car park off Stradbrook Road, this access is to be maintained in the proposed development via the new vehicular access point. The Stradbrook House site is privately owned and currently does not allow access to it, the new scheme will improve the public realm and allow for improved permeability through the site.</p>
<p>17. Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental</p>	<p>Yes The site is located adjacent to R828.</p>	<p>No</p> <p>The development will be constructed in accordance with best practice and specific controls will be put in place to manage congestion arising from the construction phase. Transport of</p>



problems, which could be affected by the project?		construction materials will be necessary but will be subject to agreed working hours. A <i>Traffic and Transport Assessment</i> has been carried out by NRB in respect of the proposal and no significant impact is envisaged.
18. Is the project in a location where it is likely to be highly visible to many people?	Yes The construction works will be partially visible to people using Stradbroom Road, Windsor Park, and the users of Blackrock College RFC (located on Stradbroom Road)	No The visual impact of the construction phase will be temporary and therefore not significant. The proposed design and scale of the development is similar to existing and permitted residential schemes in the wider area and county and therefore is not likely to have a significant environmental impact. The site is not considered to be highly visible in the context of the wider area as it is well screened by existing vegetation. We refer to the <i>Townscape and Visual Impact Assessment</i> prepared by Macroworks and submitted as part of this Planning Application.
19. Are there any areas or features of historic or cultural importance on or around the location, which could be affected by the project?	Yes	No There are no features of historic or cultural importance on or around the site which could be affected by the project. The TVIA concludes that ' <i>it is not considered that there will be any significant townscape or visual impacts resulting from the proposed development</i> '.
20. Is the project located in a previously undeveloped area where there will be loss of greenfield land?	No The site accommodates an existing 2-storey building.	No The development is proposed in a vacant brownfield site and car park and there will therefore be no loss of greenfield land.
21. Are there existing land uses on 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 which could be affected by the project?	Yes The site is located in an existing built-up area with predominantly residential land uses.	No There will be temporary impacts to the surrounding area during the construction stage, particularly in terms of visual impact; access; noise and dust. Best practice construction practice and management will ensure no such impacts are significant. Given the existing residential nature of the surrounding area, it is considered that the operational phase will not result in significant impacts.
22. Are there any plans for future land uses on or around the location, which could be affected by the project?	No The project comprises the development of urban land which has been identified as suitable for residential development. The wider	No The proposed development will not impact the future development potential of adjacent sites. <i>A Strategic Environmental Assessment (SEA) Environmental Report</i> has been prepared for the <i>Dún Laoghaire-Rathdown County Development Plan 2022-2028</i> . It has been undertaken by



	area is established in nature and there are no plans for significant development proximate to the site.	<p>CAAS Ltd. on behalf of Dún Laoghaire-Rathdown County Council. The Plan sets out an overall strategy for the proper planning and sustainable development of the functional area of Dún Laoghaire- Rathdown County Council for the period 2022- 2028.</p> <p>Reports in the current submission that are relevant to this Directive include the <i>Environmental Impact Assessment Screening Report, Planning Report, Statement of Consistency</i> and the <i>Material Contravention Statement</i>, all of which have been written by Tom Phillips Associates.</p> <p>The <i>Dún Laoghaire-Rathdown County Development Plan 2022-2028</i> has been consulted throughout the process of the design and preparation of assessment reports for this project. The <i>Dún Laoghaire-Rathdown County Development Plan 2022-2028</i> has been informed by the SEA Environmental Report for the <i>Dún Laoghaire-Rathdown County Development Plan 2022-2028</i>. As a result, no further assessment in relation to DIRECTIVE 2001/42/ EC, SEA DIRECTIVE is required</p>
23. Are there any areas on or around the location, which are densely populated or built-up, which could be affected by the project?	Yes	No See Item 21 above
24. Are there any areas on or around the location which are occupied by sensitive land uses e.g. hospitals, schools, places of worship, community facilities, which could be affected by the project?	No	No The subject site adjoins a creche (located in Somerset House) and Blackrock RFC clubhouse and playing pitches. These uses were considered in the development as proposed, and there are no significant impacts anticipated on these uses as a result of the development.
25. Are there any areas on or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, which could be affected by the project?	No	No A <i>Natura Impact Statement</i> , prepared by Altemar, has been submitted as part of this Planning Application. That NIS concludes that there are potential pathways to Dublin Bay SAC – via construction vehicle bringing materials from the site to the public road and thus onto the surface water network – however, with the mitigation measures incorporated into the <i>Construction Environmental Management Plan</i> (also submitted), it is not considered that there will be any residual effects.
26. Are there any areas on or around the location, which are already subject to pollution or environmental damage e.g., where existing legal environmental standards	No	No



are exceeded, which could be affected by the project?		
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



Arising from the above, it is considered that the proposal is not likely to have a significant impact during construction or operational stages.

In summary, it is considered that a mandatory EIA would not be required and that a sub-threshold EIA is not triggered as appropriate measures are in place to avoid, reduce or mitigate any likely impacts such that it is not likely to be a significant impact on the environment.

4.0 Conclusion

The subject project does not require mandatory EIA under Annex I. Having regard to Annex II (where EIA may be required) and Annex III (sub-threshold EIA) the subject screening has found the following:

Annex II (PDR as amended, Schedule 5 Part 2)

TYPE / CLASS	SUMMARY	COMMENT	EIA REQUIRED?
Part 2 Class 10(b)(i)	<i>Construction of more than 500 dwellings</i>	Proposal involves construction of 108 no. dwellings	NO
Part 2 Class 10(b)(iv)	<i>Urban development on area greater than 10 ha in built-up area</i>	Site area is c.0.9 ha.	NO
Part 2 Class 15	<i>Any project not meeting thresholds of Part 2 but would still be likely to have significant environmental impacts having regard to criteria in Schedule 7</i>	Proposal is not likely to have significant impacts	NO

Therefore, based on general terms (and having regard to the broad scope and purpose of the EIA Directive), it is our opinion that by virtue of its nature, size, and location, the subject project would not be likely to have significant impacts on the environment and thus EIA is not required.