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MCGILL PLANNING

Environmental Impact Assessment Screening Report

For a Proposed Large Scale Residential Development (LRD) Comprising Student Accommodation at the former "Gowan Motors Compound" Site, 169-177 Merrion Road, Dublin 4.

Prepared by MCG Planning

on behalf of 1 Merrion Land Limited

September 2024

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INTRODUCTION

On behalf of the applicant, 1 Merrion Land Limited, 27 Merrion Square, Dublin 2, this Environmental Impact Assessment (EIA) Screening Statement accompanies an LRD application to Dublin City Council under Section 32D of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 for a proposed Large Scale Residential Development student accommodation at the former Gowan Motors Compound site, 169-177 Merrion Road, Dublin 4.

The Environmental Screening Report has been prepared to assess the potential impacts on the environment arising from the proposed development at the subject site. The full details of the scheme are as follows:

The proposal will include the construction of 2 no. blocks, ranging in height from 1-6 storeys (over basement) and comprising 200 no. student bedspaces in total.

Block A will range in height from 4 to 6 storeys and will comprise 17 no. clusters providing 103 no. bedspaces (99 no. standard and 4 no. accessible rooms). Block B will range in height from 1 to 5 storeys and will comprise 15 no. clusters providing 97 no. bedspaces (96 no. standard rooms and 1 no. studio room.)

The development will also provide internal communal amenity space at basement and ground level including a reception area, lobby, parcel and laundry room, student residents' lounge, co-working space, multi-purpose gym/studio. The proposal will also include communal open space, 1 no car parking space, and 1 no. set down space at surface level. All associated site development works, services provision, cycle parking spaces, bin stores, plant, vehicular/pedestrian access, open space, landscaping and boundary treatment works.

The statement is prepared with direct input from the design team, who include MDO Architects, Tent Consulting Engineers, NMP Landscape Architects, Molloy Associates, Tree Management Services, IAC, Altemar Consulting Ecologists, ARUP Consulting Engineers, GAA and 3D Design Bureau and demonstrates that the possible effects on the environment have been examined through the process of an EIA Screening (detailed below) and confirms that the most appropriate form of development is delivered at this site.

PURPOSE OF THIS STATEMENT

The purpose of the Environmental Screening Statement is to demonstrate that there is no requirement for the preparation of an Environmental Impact Assessment Report (EIAR) for the proposed development and to identify any likelihood of significant effects on the environment that might arise. In the first instance it is noted that this development, in terms of scale/quantum and/or site area, is below any mandatory EIAR threshold prescribed by Directive 2011/92/EU, as amended by Directive 2014/52/EU (together 'the EIA Directive'), and as transposed into Irish law.

EIA SCREENING AND METHODOLOGY

The EIA Screening exercise has been guided by the following legislation and guidance:

- Planning and Development Act 2000 (as amended) ('the 2000 Act').
- Planning and Development (Amendment) (Large-scale Residential Development) Act 2021.
- Planning and Development Regulations 2001 to 2024 ('the Planning and Development Regulations').
- Guidelines on Information to be Contained in an Environmental Impact Statement (EPA 2002).
- Study on the Assessment of Indirect & Cumulative Impacts as well as Impact Interaction (DG Environment 2002).
- Environmental Impact Assessment (EIA), Guidance for Consent Authorities Regarding Sub- Threshold Development (DoEHLG 2003).
- EIA Directive 85/337/EC (as amended by Council Directive 97/11/EC, Directive 2003/35/EC, Directive 2009/31/EC, Directive 2011/92/EU and Directive 2014/52/EU.
- European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) – transposed Directive 2014/52/EU into Irish law.
- Environmental Impact Assessment of Projects – Guidance on the Preparation of the Environmental Impact Assessment Report (European Commission 2017).
- Environmental Impact Assessment of Projects – Guidance on Screening (European Commission 2017).
- Environmental Impact Assessment of Projects – Guidance on Scoping (European Commission 2017).
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (Department of Housing, Planning and Local Government, 2018).
- Guidelines on the information to be contained in Environmental Impact Assessment Reports (EPA 2022).
- Environmental Impact Assessment Screening Practice Note 2021 (Office of the Planning Regulator).

Using the above documents, it has been possible to carry out an EIA Screening using the best available guidance while operating within the applicable legislation. It is noted that Directive 2014/52/EU has been transposed into Irish Legislation through the Planning and Development Act, 2000 (as amended) / Planning and Development (Amendment) (Large-scale Residential Development) Act 2021, and the Planning and Development Regulations 2001 to 2024.

The methodology employed in this screening exercise is in accordance with the EIA Guidelines published in August 2018 by the DoHPLG and the contents of Schedule 7 and 7A of the Planning and Development Regulations.

EIA Thresholds

Schedule 5 of the Planning and Development Regulations 2001 to 2024 sets the thresholds for which if a project exceeds these limits, it then must be the subject of an Environmental Impact Assessment. Part 2 of Schedule 5 (10)(b)(i) identifies developments of more than 500 dwelling units, and (iv) identifies urban development which would involve an area of 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.

The number of bedspaces proposed in this instance is 200 (the equivalent of 50 residential units in line with the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities, 2024) which is below the 500-unit threshold. The site area at c. 0.28ha is also below the 10ha threshold for urban development in other parts of a built up area that's not a business district. Given the above, a mandatory EIAR is not required.

Sub EIA Thresholds Projects requiring an EIA

The screening process has changed under the new Directive (EIA 2014/52/EU) which requires the applicant to provide certain information to allow the planning authority to carry out proper screening to determine if an Environmental Impact Assessment Report is required. Schedule 7A of the Planning and Development Regulations outlines the information to be provided by the applicant or developer for the purposes of screening sub-threshold development for Environmental Impact Assessment as set out below:

1. **A description of the proposed development, including in particular:**
    - A description of the physical characteristics of the whole project and, where relevant, of demolition works, and
    - 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:**
    - The expected residues and emissions and the production of waste, where relevant, and
    - The use of natural resources, in particular soil, land, water and biodiversity.
4. **Compilation of the above information at paragraphs 1 to 3 shall take into account, where relevant, the criteria in schedule 7.**

Schedule 7, as referenced in Item 4 of Schedule 7A, provides a further list of criteria for determining whether development listed in part 2 of schedule 5 should be subject to an environmental impact assessment. These can be grouped under broad headings and topics as set out below:

1. **Characteristics of the Proposed Development**;
    a. The size and design of the whole of the proposed development
    b. The cumulation with other existing development and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(*b*) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment,
    c. The nature of any associated demolition works;
    d. The use of natural resources, in particular land, soil, water and biodiversity;
    e. The production of waste;
    f. Pollution and nuisances;
    g. The risk of major accidents and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge; and
    h. The risks to human health (for example due to water contamination or air pollution).

2. **Location of the Proposed Development**;

    The environmental sensitivity of geographical areas likely to be affected by proposed development, with particular regard to:
    a. The existing and approved land use;
    b. The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;
    c. The absorption capacity of the natural environment:

i. Wetlands, riparian areas, river mouth;
ii. Coastal zones and the marine environment;
iii. Mountain and forest areas;
iv. Nature reserves and parks;
v. Areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive; and
vi. Areas in which there has already been a failure to meet the environmental quality standards, laid down in legislation of the European Union and relevant to the project, or in which it is considered that there is such a failure;
vii. Densely populated areas;
viii. Landscapes and sites of historical, cultural or archaeological significance.

3. Type and Characteristics of the Potential Impacts

The likely significant effects on the environment of proposed development in relation to criteria set out under paragraphs 1 and 2, with regard to the impact of the project on the factors specified in paragraph (b)(i)(I) to (V) of the definition of "environmental impact assessment report" in section 171A of the Act, taking into account:

a. The magnitude and spatial extent of the impact (for example the geographical area and size of the population likely to be affected);
b. The nature of the impact;
c. The trans-boundary nature of the impact;
d. The intensity and complexity of the impact;
e. The probability of the impact;
f. The expected onset, duration, frequency and reversibility of the impact;
g. The cumulation of the impact with the impact of other existing and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(*b*) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment, and
h. The possibility of effectively reducing the impact.

EIA SCREENING STATEMENT

The following sections provide the information as required by Schedule 7A for the purposes of screening sub-threshold development for EIA.

A DESCRIPTION OF THE PROPOSED DEVELOPMENT

Physical Characteristics of the Proposed Development

The development description as per the statutory planning notices is as follows:

> **The proposal will include the construction of 2 no. blocks, ranging in height from 1-6 storeys (over basement) and comprising 200 no. student bedspaces in total.**
>
> **Block A will range in height from 4 to 6 storeys and will comprise 17 no. clusters providing 103 no. bedspaces (99 no. standard and 4 no. accessible rooms). Block B will range in height from 1 to 5 storeys and will comprise 15 no. clusters providing 97 no. bedspaces (96 no. standard rooms and 1 no. studio room.)**
>
> **The development will also provide internal communal amenity space at basement and ground level including a reception area, lobby, parcel and laundry room, student residents' lounge, co-working space, multi-purpose gym/studio. The proposal will also include communal open space, 1 no car parking space, and 1 no. set down space at surface level. All associated site development works, services provision, cycle parking spaces, bin stores, plant, vehicular/pedestrian access, open space, landscaping and boundary treatment works.**

Figure 1 - Site Layout Plan

In terms of the environmental sensitivity of the site the following reports, which accompany the application, are specifically noted:

- Architectural Design Report (MDO Architects, 2024)
    - This sets out the proposed works in detail.
- Planning Report (McGill Planning, 2024)
    - This report provides detail on the planning rationale, the compliance with existing planning policy and guidance.
- CGI and Verified Views (3D Design Bureau, 2024)
    - The photomontages provide a visual representation of the proposed development, showing the existing and proposed context for the development.
- Daylight Assessment (ARUP, 2024)
    - This provides a detailed assessment of the likely impact of the proposed development in terms of Daylight and Sunlight for the proposed development and the existing neighbouring properties.
- Traffic and Transport Assessment (Tent Engineering, 2024)
    - This report provides an assessment of the impact the proposed development will have on traffic and transport in the area.
- Flood Risk Assessment (Tent Engineering, 2024)

    - This report provides a detailed assessment of the likely flood risk associated with the Development.
- Civil Planning Report (Tent Engineering, 2024)
    - This report provides a detailed assessment on surface, foul and potable water connections and measures for Sustainable Urban Drainage Systems.
- AA Screening (Altemar, 2024)
    - This report provides an assessment of the impact of the development on the wider area.
- Architectural Heritage Impact Assessment (Molloy Associates, 2024)
    - This assessment sets out the impact the development will have on protected structures within the vicinity.
- Archaeological Assessment (IAC, 2024)
    - This provides details on the archaeological potential of the site.

Location of the Proposed Development

The subject site is located along Merrion Road c. 4.1km southeast of Dublin City Centre on a site area of c. 0.28ha. The site is bounded to the north by Merrion Road with residential units on the opposite side of the Merrion Road, to the east by residential dwellings (bungalows) which also front onto Merrion Road and are protected structures, to the south by Caritas Convalescent Centre and St. Marys Nursing Centre to the southeast and to the west by a 4-storey apartment block known as 'Elm Court'.

The area surrounding the subject site has undergone significant change in the last decade with numerous large-scale, modern tall buildings built within the vicinity of the site. The surrounding area comprises a range of uses such as commercial, residential, and medical uses. Immediately to the east, north and west of the site is residential, while to the south is Caritas nursing home. Within proximity of the site is Elm Park Business Centre c. 295m to the east, St. Vincent's University Hospital (with associated Nurse Education Centre) is located c. 250m to the west and Merrion Strand is to the northeast of the site c. 150m. It is also within 500m of Merrion Village.

There are excellent public transport services that operate in the surrounding area with Sydney Parade Dart Station located c. 900m or a 10-minute walk away (or 570m as the crow flies). Dublin Bus services 4, 7, 7A, 7D and 84A operate along Merrion Road with a stop located directly north of the subject lands. These connect the site to Dublin City Centre, Monkstown, Brides Glen, Bray, Greystones and Mountjoy.

The site is currently free from any permanent structures and is being used as a compound to support the completion of the former Gowan Showroom site at 145 Merrion Road. It does not contain any protected structures or buildings of architectural merit as per the National Inventory of Architectural Heritage. The nearest protected structures are a terrace of 3 bungalows which adjoin the subject site to the east fronting onto Merrion Road. Equally the site is not located within or adjoining an Architectural Conservation Area or Zone of Archaeological Potential. There are no Tree Preservation Orders on the site and no protected views from adjoining roads across the site. The site is not located within a flood risk zone.

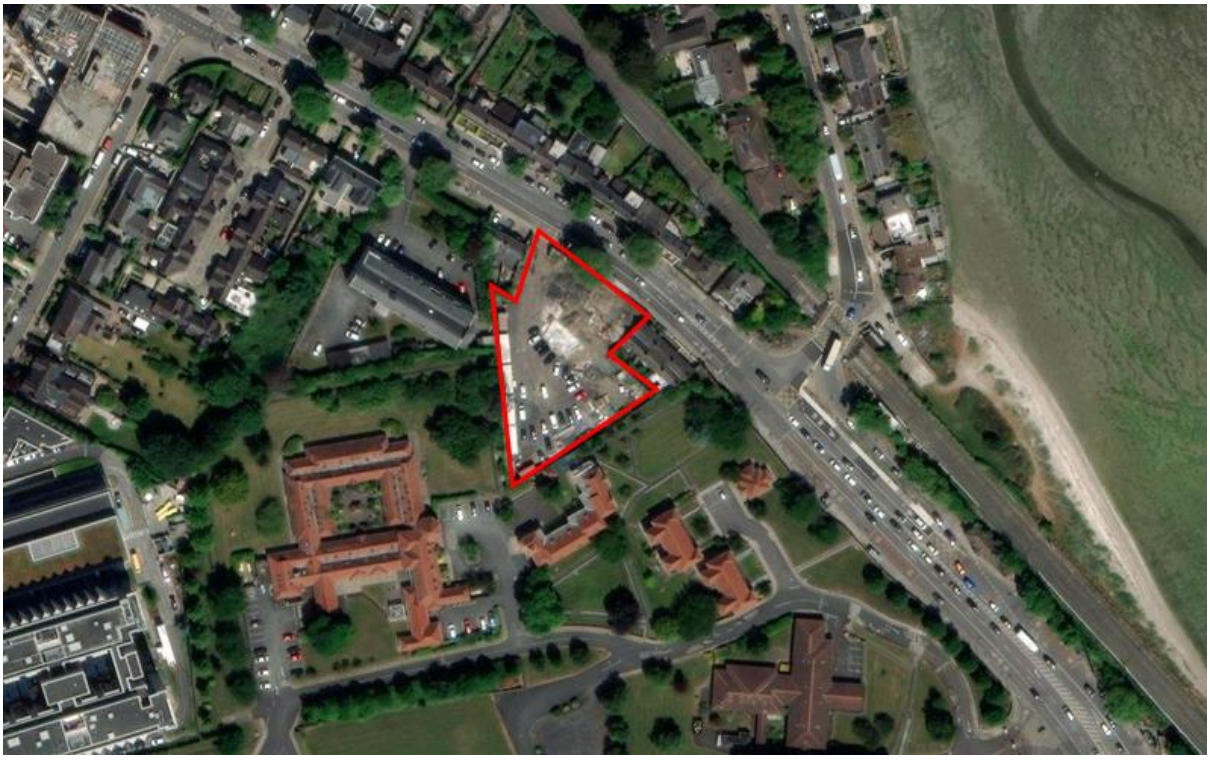

Figure 2 Site Location. Indicative red line boundary (Source: Google 2024)

Site History

McGill Planning have carried out a desktop review of the planning history of the site. There have been two relevant planning applications on this site, details of which are set out below.

DCC Reg. Ref:	4051/21
Decision:	Granted Permission with 11 conditions
Description:	The development is an amendment application to DCC Reg. Ref 4477/19 for 46 no. residential units ranging up to 6 storeys in height.

DCC Reg. Ref:	4477/19
Decision:	Granted Permission with 27 conditions
Description:	The development was for 43 no. residential units ranging up to 5 storeys in height.

This proposed development will replace this permitted development on site. The proposal is broadly similar with a similar height, architectural design and massing as that of the approved development.

A DESCRIPTION OF THE ASPECT OF THE ENVIRONMENT LIKELY TO BE SIGNIFICANTLY AFFECTED BY THE PROPOSED DEVELOPMENT

This section provides examines the possible effects on the environment under the topics prescribed by Directive 2014/52/EU. This approach provides a comprehensive description of the aspects likely to be affected by the proposed development that have not been identified.

This site is within an established, built-up urban location. It is considered that the proposed development is likely to result in a long-term positive effect, in terms of providing for a comprehensive and integrated student accommodation development on this brownfield site. The impact of this proposed development is set out in the full application documents including landscaping, architecture, environmental, and engineering.

Population & Human Health

The application site is bounded to the north by Merrion Road with residential units on the opposite side of Merrion Road, to the east by residential dwellings (bungalows) which also front onto Merrion Road and are protected structures, to the south by Caritas Convalescent Centre and St. Marys Nursing Centre to the southeast and to the west by a 4 storey apartment block known as 'Elm Court'.

During the construction phase there may be possible short-term nuisances to human beings from noise and dust during construction. Once mitigated in accordance with an agreed Outline Construction Management Plan (Tent, 2024) it is not anticipated that the construction works would result in significant environmental impacts for the local population and human health. A detailed CWMP will be submitted as part of any forthcoming grant of permission and submitted for approval to the local authority prior to commencement of works by the main contractor.

There are no operational impacts associated with this student accommodation development that would be likely to cause significant effects in terms of population and human health. The additional residential created will have a positive impact on the area and will help sustain existing services and public transport and provide demand for additional. The provision of communal open space and residential amenity for the students enhances an underutilised brownfield site in an urban area which will improve the experience of the area for future residents.

Biodiversity

The site is a cleared site. It is currently being used as a compound for the former Showroom development at 145 Merrion Road Reg Ref 4240/19 (as amended by 4906/22). There are no flora or fauna of note currently on site.

Altemar Marine and Environmental Consultancy have completed an Appropriate Assessment Screening for the proposed development. This report concludes that:

The proposed development site is located within a densely populated urban environment. The proposed development is in place of similar permitted development reg ref 3963/21 which was for two blocks of apartments providing 46 units. The proposed development would have a similar impact to that of the permitted development.

The nearest European site is South Dublin Bay SAC (78m) (Figure 8). The nearest river waterbody to the subject site is the Elm Park Stream, located 223m south of the site boundary (Figure 8). Both surface and foul water discharge from the site will ultimately connect to the existing combined sewer on Merrion Road. The water will

then be treated at Ringsend WwTP, prior to being discharged to Dublin Bay. There is, therefore, an indirect hydrological pathway from the proposed development site to the European sites located within Dublin Bay (South Dublin Bay SAC, North Dublin Bay SAC, South Dublin Bay and River Tolka Estuary SPA, North Bull Island SPA, and North-West Irish Sea cSPA). However, given the minimum distance from the proposed development site to European sites at Dublin Bay, and the fact that foul and surface water will be treated at Ringsend WwTP via the combined sewer network, any pollutants, dust or silt laden run off will be dispersed, diluted, and ultimately treated within the public network prior to reaching the marine environment. In the absence of mitigation, no significant effects on European sites are likely. No specific mitigation is required to prevent impacts on European sites.

Having taken into consideration foul and surface water drainage from the proposed development, the distance between the proposed development to designated conservation sites, lack of direct hydrological pathway or biodiversity corridor link to conservation sites, and the dilution effect with other effluent and surface runoff, it is concluded that the proposed development would not give rise to any significant effects to designated sites. The construction and operation of the proposed development will not impact on the conservation objectives of qualifying interests of European sites.

This report presents a Stage 1 Appropriate Assessment Screening for the Proposed Development, outlining the information required for the competent authority to screen for appropriate assessment and to determine whether or not the Proposed Development, either alone or in combination with other plans and projects, in view of best scientific knowledge, is likely to have a significant effect on any European or European site.

On the basis of the content of this report, the competent authority is enabled to conduct a Stage 1 Screening for Appropriate Assessment and consider whether, in view of best scientific knowledge and in view of the conservation objectives of the relevant European sites, the Proposed Development, individually or in combination with other plans or projects is likely to have a significant effect on any European site.

It is also noted that a Biodiversity Enhancement Plan, prepared by Altemar, is also submitted with this application. This ensures that the development will enhance the existing environment through appropriate planting and the incorporation of bird and bat boxes.

Lands and Soils

The site is brownfield in nature. There are no existing structures present. The topography of the site is generally flat. While there is proposed alterations to the levels across the site to facilitate the underground infrastructure provision and basements, the construction or operation of the scheme would not use such a quantity of soils to result in significant effects on the environment.

Water

The proposed development shall provide a combined connection. This has been agreed with Irish Water/ Uisce Eireann.

The proposed development has been assessed in relation to Sustainable Urban Drainage Systems (SuDS) and designed in accordance with DCC Development Plan and the UK SUDS Manual. A Green-Blue roof is proposed in line with the Development Plan Appendix 11. This contributes to the interception storage and attenuation storage and reduces the flow and discharge rates. It is also proposed to provide permeable paving, Aco Drains and Rainwater Garden Planters which provides additional mitigation measures to reduce run off, provide infiltration and surface water drainage solutions.

The foul sewer layout is designed in line with the Irish Water "Code of Practice for Wastewater Infrastructure" to service the entire site and is proposed to drain by gravity. No on-site existing foul water network is identified after the interrogation of GIS service maps by Tent Engineering therefore it is proposed to connect the site through a tie-in point on existing services adjacent to the application site. An existing public combined sewer of ø300mm vitrified clay flows in Southerly direction.

The Civil Planning Report prepared by Tent Engineering provides further detail on the proposed surface water, foul water, and water supply for the site.

The Flood Risk assessment prepared by Tent Engineering confirms that the proposed student accommodation units are located within Flood Zone C and this proposed development is appropriate to this location without further mitigations.

Air and Climate

Generally, the primary potential air quality impact or nuisance associated with construction activities is dust. Excavations and earth moving operations may generate quantities of construction dust, particularly in drier weather conditions. The extent of any construction dust generation depends on the nature of the construction dust (soils, sands, gravels, silts etc.) and the construction activity. The potential for construction dust dispersion depends on the local meteorological conditions such as rainfall, wind speed and wind direction. The main potential sources of air borne dust from construction activities include Construction vehicles, construction traffic and haulage routes; Excavation works and earth-moving activities; Materials (particularly excavated soils) handling, storage and stockpiling.

There are no likely significant effects on air quality arising from the proposed development, except for the potential temporary effect arising from dust during the construction phase. The effects on human health arising from the construction phase of the proposed development is considered to be imperceptible in this regard. Standard environmental control measures will be employed in an agreed Construction Management Plan.

The proposed development is not likely to have a significant effect on Air and Climate during the operational phase.

Noise and Vibration

Construction noise, while inherently noisy and disruptive, is temporary in duration. It is anticipated that the construction of the proposed development would take approximately 36 months to complete. The works involving heavy machinery for the purposes of excavation, the preparation of building foundations and passing construction traffic usually cause the most disturbances to nearby residents. Noise control measures would be implemented by the construction works contractor for the duration of the construction of the proposed development.

The Outline Construction Management Plan prepared and submitted includes environmental control measures to manage the noise impact on the surrounding residential area where possible.

There are no likely noise emissions arising from the residential development at this site other than those associated with the operation of the site as a residential development including operational traffic associated with the development.

Landscape & Visual

It is submitted that the overall development will have a positive impact on the landscape features of the site and the character of the area. This is confirmed by the Biodiversity Enhancement Plan. Please refer to the documentation prepared by NMP Landscape Architecture and Altemar for further detail. The proposed development will not impact on any designated views or prospects within the Dublin City Council Development Plan.

Traffic

The Traffic and Transport Assessment, prepared by Tent Engineering, has considered the traffic and transportation implications of the proposed development. It demonstrates that the development can be readily accessed by existing and future sustainable modes of transport within the immediate vicinity of the site. Only one accessible car parking space and no other car parking for residents is proposed as part of this development.

The proposal provides 248 no. secure bicycle parking spaces for residents, staff and visitors at ground floor and basement level, of which 5% is non-standard bike parking equivalent to 12 parking spaces distributed across the site, this is considered appropriate given the central and accessible location of the site.

The proposed development is not anticipated to have a detrimental impact on the local road network in terms of congestion and road safety.

Material Assets

The land on which the site is situated is a material asset. The site is zoned Z1 '*Sustainable Residential Neighbourhoods'* and can accommodate student accommodation through the appropriate process. The use of this material asset in a manner compatible with the zoning designation, for student accommodation, is entirely appropriate. Once constructed, the operational phase will provide an important material asset for the area in terms of accommodation for neighbouring educational facilities.

Other material assets in terms of water services, electricity, and other utilities are all available in this residential area and the proposed development to readily connect to same. There are no strategic utilities running through the site which would be impacted by the proposed development.

Archaeology, Architecture and Cultural Heritage

The site does not contain any structures or features above ground. There are no protected structures on the site. The site is also located outside of the Zones of Archaeological Interest identified on the Dublin City Council Development Plan.

The Architectural Heritage Impact Assessment completed by Molloy Associates confirms that the proposal is similar to the previous scheme. This report identifies three protected structures at Nos 179, 181 and 183 Merrion Road as well as a pair of semi detached houses which are of heritage interest at nos 165 and 167 Merrion Road. It also identifies historic granite walled boundaries existing in various forms along the north and west of the south if the site. This report confirms that "*The proposed development, addressing a busy road, seeks to construct an infill building of scale between two lower scaled, established, building groups of heritage interest. Its modulated form introduces flexibility at boundaries shared with both groups, enabling it to better integrate with what is an inconsistent, but acceptably diverse streetscape, reflecting both the rhythm*

of extant fenestration and pitched roof typologies dominant in the vicinity. The resulting scheme in its dynamic interpretation of common local characteristics, blends successfully with its environs and introduces an enrichment that does not dominate either the setting or character of buildings of heritage interest adjacent."

Vulnerability of the project to risks of major accidents and/ or disasters.

The subject lands are not proximate to any Seveso/COMAH designated sites.

The Flood Risk Assessment identifies that the site is within Flood Zone C, with a low probability of flooding.

The proposed development is not considered vulnerable to major accidents and/ or disasters, and therefore the expected effects are considered to be negligible.

Inter-relationship between the above factors

It is considered that any of the previously identified relatively minor temporary effects are not in themselves considered significant nor will they cumulatively result in a likely significant effect on the environment.

A DESCRIPTION OF ANY SIGNIFICANT EFFECTS TO THE EXTENT OF THE INFORMATION AVAILABLE ON SUCH EFFECTS OF THE PROPOSED DEVELOPMENT ON THE ENVIRONMENT

This includes information available on the environment including:

(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.

The proposed development is on a brownfield vacant site in a central location and within an existing serviced urban area. The proposed works are residential in nature and will require the construction of two blocks of student accommodation using regular building materials. Given the nature of the site and the Proposed Development they will be no likely significant effects on land, water or biodiversity.

It is expected that there will be some residues/emissions created during the construction stage associated with the development works proposed which include ground preparation works, development of site infrastructure, construction of buildings and hardstanding areas and landscaping of the site including open soft landscaped areas.

Standard mitigation measures will be employed and monitored. These measures will be set out in an agreed Outline Construction Management Plan. As such residues and emissions are not considered likely to have potential to cause significant effects on the environment.

There will be some waste materials produced in the construction of the proposed scheme which will be disposed of using licensed waste disposal facilities and contractors. As is standard practice the scale of the waste production in conjunction with the use of licensed waste disposal facilities and contractors will not cause concern for likely significant effects on the environment.

An Operational Waste Management Plan (OWMP) accompanies the application which sets out measures ensuring the maximise quantity of waste is recycled throughout the proposed residential development. The scheme will provide sufficient waste recycling infrastructure, waste reduction initiatives and waste collection and waste management information to the residents of the development.

There will be no large-scale use of natural resources. The main use of natural resources will be land. The subject lands are brownfield lands which are zoned *'to protect, provide and improve residential amenities.'*

Other resources used will be construction materials which will be typical raw materials used in construction of residential developments. The scale and quantity of the materials used will not be such that would cause concern in relation to significant effects on the environment.

The construction or operation of the scheme would not use such a quantity of water to cause concern in relation to significant effects on the environment. The use of natural resources in relation to the proposed development is not likely to cause significant effects on the environment.

COMPILATION OF THE ABOVE INFORMATION TAKING SCHEDULE 7 CRITERIA, AS APPROPRIATE, INTO ACCOUNT

The compilation of the above information and assessing the development against the Schedule 7 criteria:

Characteristics of Proposed Development	
The size of the proposed development.	The site is c. 0.28ha and the development is for 200 student bedspaces within 32 no. clusters. The development is sub-threshold for EIA.
The cumulation with other existing development and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(*b*) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment.	This proposed development will replace the permitted development granted under Reg Refs 4477/19 and 4051/21. Construction is underway at The Gowan Motor Showroom site under Reg Ref 4240/19 and as amended for an apartment development located to the north of this site. Other minor applications include a retention application at Herbert Montessori School under reg ref 2986/20 and also an application at Caritas Convalescent Centre and St Vincents hospital to remove part of the boundary wall to create a new route between the two. However, all of these are not largescale developments and as such it is considered that the Proposed Development does not give rise to cumulation with other development for the purposes of Section 172(1A)(b) of the Planning and Development Act 2000, as amended.
The nature of any associated demolition works.	No demolition works associated with this proposed development. All demolition has occurred on site under the previous permissions Reg Refs 4477/19 and 4051/21. which this application will replace. It is noted that a basement is proposed as part of this development which will require excavation.
The use of natural resources, in particular land, soil, water and biodiversity.	The main use of natural resources from this development will be the use of land. The subject site is currently brownfield, which is zoned for sustainable residential neighbourhood uses which accommodates student accommodation. The proposed development is located on an enclosed site in the urban environment of Dublin City. Both surface and foul water discharge from the site will ultimately connect to the existing combined sewer on Merrion Road. The water will then be treated at Ringsend WwTP where it will be treated appropriately prior to discharge into Dublin Bay. High quality landscaping, planting and SuDS measures will be incorporated into the development to ease water runoff. No use of natural resources other than the normal use of building materials is proposed.
The production of waste.	Construction waste produced will be controlled, stored and disposed of in a sustainable manner as per relevant environmental guidance. Operational waste for the residential development will be controlled by each household and dealt with by municipal services. This is set out in the Operational Waste Management Plan by Tent Consulting Engineers.
Pollution and nuisances.	The construction phase will create short term negative effects particularly in terms of dust and noise.

	The implementation of the Outline Construction Management Plan by Tent Engineering will ensure that construction activities are properly controlled and mitigated.
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	Standard construction practices will be employed throughout the construction phase to mitigate the potential of any major accidents or disasters from occurring. The proposed location of development is not considered particularly vulnerable to major accidents and/or disasters and therefore the expected effects are considered to be minimal.
The risks to human health (for example, due to water contamination or air pollution).	There are likely effects at construction stage in terms of noise, dust and contaminated run-off. However, these will be temporary and will be mitigated in accordance with the Outline Construction Management Plan.
Location of Proposed Development	
The existing and approved land use.	The site is currently brownfield. It is zoned Z1 'Sustainable Residential Neighbourhoods', student accommodation can be accommodated under this use.
The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground.	This is an allocated urban site that will be developed for student accommodation appropriate to its location. The provision of open spaces (communal) will be positive for the area. The use of SuDs measures on site is an additional benefit.
The absorption capacity of the natural environment, paying particular attention to the following areas: (i) wetlands, riparian areas, river mouths; (ii) coastal zones and the marine environment; (iii) mountain and forest areas; (iv) nature reserves and parks; (v) areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive and; (vi) areas in which there has already been a failure to meet the environmental quality standards laid down in legislation of the European Union and relevant to the project, or in which it is considered that there is such a failure; (vii) densely populated areas; (viii) landscapes and sites of historical, cultural or archaeological significance.	(i) The site itself is not located within a wetland, river mouth, coastal zone, marine environment, mountain, forest, nature reserve, park, or protected site. The nearest river waterbody to the subject site is the Elm Park Stream, located 223m south of the site boundary. (ii) The subject site is not located in a coastal zone or marine environment. (iii) The subject site is not located within a mountain or forest area. (iv) The subject site is not located within a nature reserve or park. (v) The subject site is not located within a European Site or a Natura 2000 classified or protected area. the nearest European site to the proposed development is 78m away (South Dublin Bay SAC). The AA Screening concluded that *"In the absence of mitigation, no significant effects on European sites are likely. No specific mitigation is required to prevent impacts on European sites."* (vi) The subject site is not located within an area in which there has already been a failure to meet environmental standards. (vii) The surrounding area is a densely population urban environment. (viii) The subject site located next to three protected structures. An AHIA has been carried out and confirmed that the proposal will not have a detrimental impact on these structures, it would be similar to that of the permitted development.
Types and characteristics of potential impacts	
The magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected).	Given the existing context it is expected that the proposed development will not have any significant environmental impact beyond the site and immediate vicinity.

	All construction activities will be governed by a Construction Waste Management Plan the details of which will be agreed with Dublin City Council prior to commencement of development.
The nature of the impact.	The potential likely and significant impacts arising from the development will be typically those associated with a medium to high scale residential development in an area designated for growth. The nature of the impacts, other than visual, are expected to be of a magnitude that would not be significant, adverse or permanent. The impact of the student accommodation at operational stage will be typical of this sustainable residential neighbourhood area and will not be significant, adverse or permanent.
The transboundary nature of the impact.	Any minor impacts will be contained in the immediate vicinity of the site. The subject lands are not located on any geographical or other boundary of relevance to assessment of likely significant effects on the environment.
The intensity and complexity of the impact.	The proposed development is not of any significant intensity or complexity such that would be likely to cause significant effects on the environment.
The probability of the impact.	It is probable that the minor impact of noise and pollution during the construction phase will occur; however, construction works on zoned lands within the area are not unexpected or out of character, and working hours will be limited to hours set by the planning conditions.
The expected onset, duration, frequency and reversibility of the impact.	The minor impacts identified would occur during the construction phase only. The frequency of impacts will vary throughout the construction phase; however, the impact is still considered to be insignificant as any potential impacts will be effectively managed, reduced or eliminated. The minor effects associated with the construction phase such as noise, dust and traffic will be temporary. There are no significant negative impacts which are considered likely to occur during the operational phase of the proposed residential development.
The cumulation of the impact with the impact of other existing and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(*b*) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment.	The scale of the proposed scheme is not such that the characteristic of any potential impacts, in combination with each other, are likely to cause significant effects on the environment.
The possibility of effectively reducing the impact.	Appropriate environmental control measures will be undertaken in order to ameliorate effects on the environment arising from the proposed development. Any control measures to manage noise, dust and/or pollution during the construction phase will be based on standard best practice, policies and guidance.

SUMMARY

The site is located on appropriately zoned lands and the proposed development is in accordance with the zoning objective and associated local and national planning policies.

The proposed development provides for student accommodation with 200 bedspaces including communal internal and external space and associated works. It is considered that the characteristics of the proposed development, its location and the type and characteristics of the potential impacts arising do not give rise to likely significant environmental impacts. While temporary or short-term impacts in relation to construction noise and dust may arise, such impacts are typical of any construction phase, and any potential impacts on nearby receptors will be effectively managed through mitigation measures and standard best practice construction measures.

CONCLUSIONS

In conclusion, it is respectfully submitted that the proposed development is below the thresholds of a mandatory EIAR.

The screening exercise (for potential sub-threshold EIAR) has been completed in this report and the methodology used has been informed by the available guidance, legislation and directives.

It is considered that a sub threshold EIAR is not required for the proposed development as the proposal is below the thresholds of Schedule 5 of the Planning and Development Regulations; the proposal is unlikely to have effects on the Natura 2000 Network, either alone or in combination with other plans; the development will be connected to public services such as water and foul systems; standard construction practices can be employed to mitigate any risk of noise, dust or pollution; and no identified impact in this screening exercise either individually or cumulatively will have significant impacts on the environment.

In conclusion, it is considered that the proposed development will not have any significant impacts on the environment. All recommended mitigation measures and standard practices will be employed throughout the construction and operation phase of the development to ensure that the proposed development will not create any significant impacts on the quality of the surrounding environment.