

DOWNEY

29 Merrion Square, D02RW64

**Environmental Impact Assessment Screening
Report & Statement in Accordance with Article
299(1)(b)(ii)(II)(c) of the P&D Regulations
2001 (as amended)**

**Proposed Strategic Housing Development
on Lands at 23-28 Prussia Street, Dublin 7**

Applicant: Randalswood Construction Ltd.

December 2021

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1.0 INTRODUCTION

This Environmental Impact Assessment (EIA) Screening report and Statement in accordance with Article 299(1)(b)(ii)(II)(c) of the Planning & Development Regulations, 2001 (as amended, the 2001 Regulations) has been carried out by Downey Planning, Chartered Town Planners, 29 Merrion Square, D02RW64, on behalf of Randalswood Construction Ltd., as part of a proposed Strategic Housing Development on lands at 23-28 Prussia Street, Dublin 7.

1.1 Legislative Context

The EIA Directive 85/337 EEC, as amended (Directive 2011/92/EU; Directive 2014/52/EU), is the key legislation in EU Environmental Policy. The EIA Directive aims to determine the likely significant effects of a project on the environment. Screening is the first stage in the EIA process required by Article 4 of the EIA Directive and this process determines whether an EIA is required for a specific project. The Directive outlines, in Article 4(1) 24 Annex 1, projects that require a mandatory EIA. Article 4 (2) Annex 2 outlines other projects that require consideration for EIA further to a case-by-case examination or through thresholds and criteria set out by Member States.

It is noted that Directive 2014/52/EU has been transposed into Irish Legislation through the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 which came into operation on the 1st of September 2018. These regulations, in turn, resulted in an amendment to the 2001 regulations. Projects requiring a mandatory EIA or consideration for EIA further to a case-by-case examination or thresholds are listed in Schedule 5 of 2001 Regulations.

In the case of developments which are under the relevant EIA threshold, planning authorities are required under Article 103 of the 2001 Regulations to request an Environmental Impact Assessment Report (EIAR) where it considers that the proposed development is likely to have significant environmental effects. In such cases, the significant effects of the project on the environment are assessed relative to criteria outlined in Schedule 7 of the 2001 Regulations, namely the project's characteristics, sensitivity of the project location and characteristics of potential impacts.

Article 299B of the 2001 Regulations, require An Bord Pleanála to carry out a preliminary examination of the nature, size and location of any proposed sub-threshold SHD development which is not accompanied by an EIAR. A statement in accordance with Article 299(1)(b)(ii)(II)(c) (Appendix A) has been provided with this Environmental Impact Assessment Screening Report, indicating how the available results of other relevant assessments of the effects on the environment, other than the Environmental Impact Assessment Directive have been considered in the assessments prepared as part of this Strategic Housing Development application.

This information is provided for An Bord Pleanála to assess the application for the purposes of screening in accordance with Article 299(1)(b)(ii)(II)(c) of the 2001 Regulations.

2.0 DESCRIPTION OF THE PROJECT

The project is described, as per the planning application statutory notices, as follows:

- (i) The demolition of all existing structures on site, including no. 23 Prussia Street (a 2-storey terraced house with commercial use on the ground floor) and the remnants of the facades of no. 24 & 25 Prussia Street;
- (ii) Works to the historic Grangegorman boundary wall (Protected Structure), including the removal of the existing concrete coping on top of the existing stone wall and the removal of a section of the wall to facilitate the provision of the primary pedestrian and cycle access route from TU Grangegorman Campus to Prussia Street, in accordance with the Grangegorman SDZ Plan (amended by ABP Ref: ZE29N.ZE0005). The interface of this primary route with Prussia Street will be denoted by a proposed gatehouse feature.
- (iii) Construction of a residential development of 162 no. 'build to rent' apartments (107 no. 1 beds, 53 no. 2 beds, 2 no. 3-bed) in 1 no. block, ranging in height from 3 storeys over basement fronting Prussia Street to 13 storeys over basement fronting TU Grangegorman Campus. The development will provide for private balconies/terraces/winter gardens and 3 no communal roof terraces (one at 5th floor level and two at 8th floor level) and a landscaped courtyard at ground floor level.
- (iv) At ground floor level the development will provide for a café, café stores rooms and communal w.c. facilities and ancillary residential amenity facilities, including a gym, multi-purpose gym space, lobby, co-working spaces, meeting room and office/parcel storage area A residents cinema will be provided at basement level.

The development also includes; the construction of a basement providing storage and plant rooms, a bin store and 22 no car-parking spaces, 4 motorcycle spaces and 336 bicycle spaces (including 5 cargo bicycle parking spaces) with access via Prussia Street; 1 no. ESB sub-station; landscaping including play equipment and hard and soft landscaping along the primary pedestrian route; public lighting; signage; boundary treatments; and all associated site development infrastructure and site works including foul and surface water drainage, necessary to facilitate the development.

This implementation of the project will include site clearance works and demolition of existing buildings, a construction phase to include new surface water drainage infrastructure and connection to electricity and wastewater networks. The main phases of this project include:

- Site clearance and preparation including excavation to basement level.
- A construction phase using standard building materials.
- Construction will include a new surface water drainage infrastructure and connection to electricity and wastewater networks.
- An operation phase whereby the apartments will be occupied.

3.0 METHODOLOGY

This report relates to the screening for an EIA of a proposed Strategic Housing Development on lands at 23-28 Prussia Street, Dublin 7. In accordance with the EIA Directive and transposed National Legislation, the project will be assessed to determine if a mandatory EIAR is required or if the project is a sub-threshold project, it will also be screened in order to determine whether significant effects on the environment are likely to result from the project, on a permanent or temporary basis. This report is written in accordance with guidelines provided in:

- European Union (Planning & Development) (Environmental Impact Assessment) Regulations 2018
 - Directive 2011/92/EU
 - Directive 2014/52/EU;
- Planning and Development Act 2000 (as amended)
 - Planning and Development Regulations 2001 (as amended)
 - Planning and Development (Housing) and Residential Tenancies Act 2016 (as amended)
 - Amendment of Planning and Development (Amendment) Act 2018
- Guidance
 - Guidance for EIA Screening, European Commission (June 2001)
 - Guidelines on the information to be contained in an EIS, EPA (March 2002)
 - EIA Guidance for Consent Authorities regarding Sub-Threshold Development, DoEHLG (August 2003)
 - Preparation of guidance documents for the implementation of EIA directive (Directive 2011/92/EU as amended by 2014/52/EU) – Annex I to the Final Report (COWI, Milieu; April 2017);
 - Guidelines on the Information to be contained in Environmental Impact Assessment Reports, Draft (August 2017)
 - Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, DoEHLG (August 2018)
 - Transposition of 2014 EIA Directive (2014/52/EU) in the Land Use Planning and EPA Licensing Systems – Key Issues Consultation Paper (2017; DoEHLG);

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.

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 2001 Regulations 2001.

4.0 STATUTORY REQUIREMENT FOR AN EIAR

Development projects requiring an EIAR are set out in Schedule Five of the 2001 Regulations. Part 1 of this schedule lists those projects that require a mandatory EIS irrespective of size in any EU Member State whereas Part II identifies the threshold limits for projects that require a mandatory EIAR in Ireland.

Article 10(b)(i) of Part II ‘Infrastructure Projects’ indicates that an EIAR is required for the construction of more than 500 dwellings. The total number of dwellings proposed for this planning application is 162 no. ‘Build to Rent’ units. The proposed development therefore does not meet the thresholds for which the preparation of an EIAR is a mandatory requirement.

Another threshold is the size of the development site and in this regard Article 10(b)(iv) requires that an EIAR be prepared for urban developments 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. The subject site in this instance extends to 0.38 hectares and as such is significantly below the threshold that would normally require an EIAR to be prepared.

5.0 EIAR SCREENING FOR SUB THRESHOLD DEVELOPMENTS

The criteria under which the project must be considered are outlined within Article 27 of the European Communities (Environmental Impact Assessment) Regulations, 1989 and Schedule 7A of the Planning and Development Regulations 2001 (as amended) and the screening criteria categories include:

- (i) Characteristics of the Proposed Development;
- (ii) Location of the Proposed Development; and,
- (iii) Characteristics of Potential Impacts.

4.1 Characteristics of the Proposed Development

4.1.1 *Size of the Proposed Development*

The proposed development consists of 162 no. 'Build to Rent' apartments along with associated site development works, boundary treatment and landscaping on a site extending to 0.38 hectares. In this regard, the development falls below the EIAR threshold for infrastructure projects that is set out under 10(b)(i) and 10(b)(iv) of Part 2 of the fifth schedule of the Regulations and Schedule 7(a) of the Regulations.

4.1.2 *Potential Cumulative Impact with other Developments*

Downey Planning carried out searches of the plans and projects that may have the potential to result in cumulative impacts. Data sources included the following:

- Dublin City Council;
- An Bord Pleanála; and
- EIAR Portal.

The searches revealed some large-scale permitted projects located along Prussia Street, including the re-development of the TU Dublin Grangegorman Campus. There have been recent significant planning applications adjoining the subject site or near the site. The most significant applications relate to student accommodation developments located along Prussia Street to the north and south of the subject site and the application for the re-development of the Park Shopping Centre to the north of the subject site, as well as those pertaining to the TU Dublin Grangegorman Campus, however it is considered that a cumulative impact would not occur with the developments relating to the intensification of existing urban land or to zoned land which has a high magnitude of change and environmental effects which are managed through planning policies and planning conditions attached to the grant of planning permission.

4.1.3 *The Use of Natural Resources*

Whilst exact quantities of materials required have not been determined at this stage, large amounts of aggregates will be used during construction phase. This material will need to be imported to the subject site. Potable water will also be required to be supplied to the site. The building will be constructed using standard building materials, at a scale typical of that expected at a construction scheme of this size.

4.1.4 The Production of Waste

Quantities of unsuitable material will be excavated and not reused during the construction phase of the development. Whilst the exact amount of this unsuitable material has not been evaluated, an assessment can be undertaken to identify potential locations for recovery/disposal as part of the construction and demolition waste management plan and environmental effects minimised accordingly, including through the imposition of planning conditions. Please refer to the Construction and Demolition Waste Management Plan enclosed with this application under separate cover.

4.1.5 Pollution and Nuisances

The subject site is not located within or adjoining any designated Natura 2000 sites.

During construction, polluting material has the potential to cause environmental effects, however the likelihood and severity of these effects will be minimised through the employment of construction management best practice. During the construction stage, minor temporary effects may be experienced by those property owners in the vicinity of the site and those road users on the existing network, which will be controlled using construction management techniques.

When the proposed development is operational there may be some increase in noise and traffic levels on the adjoining road network. However, the traffic impact is designed so that the road network will still operate within its capacity and the development will have a minimal impact on the surrounding network.

4.1.6 The Risk of Accidents, having regard to substances or technologies

During the construction stage, the likelihood of an accidental spillage of construction materials into any sensitive environment will be managed through the adoption of strict best practice construction management in accordance with an approved construction and demolition waste management plan. During the operational stage, it is anticipated that there will be limited, if any, risk of major accidents.

4.2 The Location of the Proposed Development

4.2.1 Site Description and Land Use

The subject site is located to the east side of Prussia Street (Nos. 23-28) opposite the junction with St. Joseph's Road. The site is a skewed rectangle in shape, which extends to approximately 0.38 hectares and fronts onto Prussia Street. It is bound to the north by No. 29 Prussia Street (a Protected Structure) and a car repair centre, and by residential dwellings to the south. The TU Dublin Grangegorman Campus is adjacent the subject site to the east, with the stone boundary wall of St. Brendan's Hospital

forming the east (rear) boundary of the site – partly incorporated into existing structures within the site.

The application site comprises brownfield lands, which contain, a number of sheds and structures, the remnants of the ground floor frontage of no.s 24 and 25 and no. 23 Prussia Street, a 2-storey, end of terrace property which includes a ground floor commercial unit. The site was in use as a car wash and auto repair centre but has been vacant for some time now. It is proposed to demolish the existing structures on site in order to facilitate the proposed scheme. The lands have been in mixed commercial use for several decades, previously serving as the location of a terrace of Georgian houses.

The surrounding area is primarily low-rise residential in nature with some local commercial and retail uses. Further car repair and maintenance businesses are situated to the north of the proposed development site, with recently constructed residential buildings located opposite the site to the west side of the street, and residential and commercial buildings, some of which are of Georgian character, fronting Prussia Street to the south. The area already enjoys excellent amenities, various educational facilities, as well as retail facilities and multiple other community facilities and large areas of open space in the vicinity of the site.



Fig. 1 – Aerial Photograph of Application Site (Application Site outlined in red)

4.2.2 *The Relative Abundance, Quality and Regenerative Capacity of Natural Resources in the Area*

As is standard with any development of this nature, a significant amount of construction material will be required for the construction of the proposed development which is typical of any similar sized development in the country and is not beyond the normal range.

4.2.3 *The Absorption Capacity of the Natural Environment*

(a) Wetlands

There are no wetlands or watercourses located within or adjacent to the subject site that could be affected by the proposed development.

(b) Coastal Zone

There are no coastal zones within or adjacent to the subject site that could be affected by the proposed development.

(c) Mountain and Forest areas

There are no mountains or forest areas within or adjacent to the subject site that could be affected by the proposed development.

(d) Nature Reserves and Parks

There are no nature reserves or parks within or adjacent to the subject site that could be affected by the proposed development.

(e) Protected and Designated areas

There are no protected or designated areas located within the subject site or adjacent to it. There is no direct route to any other protected or designated sites further away and in this regard, the proposed development will not have any negative affect or impact on any protected or designated areas. This has been confirmed in the Screening Report for Appropriate Assessment that was prepared by OPENFIELD Ecological Services as part of this proposed development.

(f) Environmental Quality

From the information available at this stage of the process there are no known areas in which the environmental quality standards have already been exceeded.

(g) Densely Population Areas

The proposed development is situated in Prussia Street (Nos. 23-28) within the Dublin city core, therefore representing an inner-city location. The current lands are considered brownfield lands with existing structures in place. They are zoned and serviced for residential development and are contiguous to an existing built-up urban area and as such there will not be any significant change in the overall of the surrounding area as a result of this proposed development.

(h) Landscapes of Historical, Cultural or Archaeological Significance

The subject site is not located within a sensitive landscape character area and is not subject to any protected or preserved views, so the environmental effects arising in a landscape and visual sense are unlikely to be significant. Further, the proposal has been designed to prevent undue impact on third party properties such as overlooking, overshadowing and loss of daylight/sunlight and in this regard any potential impact is expected to be slight given the orientation of the scheme and the inner-city

Location of the site. An Archaeological Desktop Assessment was carried out by Shanarc Archaeology. The site is situated within a Zone of Archaeological Interest for Dublin City (DU018-020), which extends along Prussia Street, and the closest Record of Monuments and Places (RMP) site is a house of 18th/19th century date (DU018-020251) which formerly fronted the east side of Prussia Street 102m to the north-west. No direct risk is posed to this RMP site by the proposed development.

There are no protected structures located within the site. There are 10 entries in the RPS situated in the surrounding streets. Of these, No. 29 Prussia Street (RPS Ref. 6873 and NIAH Ref. 50070061, a 3-storey Georgian-style house) is situated adjacent the proposed development and will not be impacted by the proposed development – the proposed works may impact upon its associated rear brick garden wall. The stone wall enclosing St Brendan’s Hospital complex is listed as being protected on North Circular Road. This wall forms the east boundary of the site and is incorporated into some of the recent structures on the subject site, a portion of this wall will be removed as part of this scheme. The interface of this primary route with Prussia Street will be denoted by a proposed gatehouse feature to mitigate the impact on the historic structure

Extant Georgian era fabric is present within the site, which comprises the extant remains of a semi-detached pair of houses Nos. 24 and 25 (which are recorded by the NIAH as Ref. 50070062) and the remnants of Nos. 26-28 Prussia Street. No. 23 is apparently mid-late 19th century date. This extant fabric is proposed for demolition as part of the scheme.

In addition to the above-ground Georgian fabric, there are likely related sub-surface features and deposits on the site. In this regard, it is considered that mitigation measures are necessary in the form of planning conditions relating to a watching brief for archaeology during the construction period, in order to comply with national policy guidelines and statutory provisions for the protection of archaeological, architectural and cultural heritage. As such, the proposed development will not have a negative impact on the archaeological or cultural heritage of the area subject to the mitigation measures proposed.

4.3 Type and Characteristics of the Potential Impacts

This section of the report shall consider the criteria under Schedule 7, which relates to the characteristics of the potential impacts and the location of the development being proposed, paying particular regard to the following:

“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, geographical area and size of the population likely to be affected),*
- (b) the nature of the impact,*
- (c) the transboundary 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.”*

4.3.1 Magnitude and Spatial Extent of Potential Impacts

The subject site extends to approximately 0.38 hectares and the proposed development will provide a total of 162 no. 'Build to Rent' apartments along with landscaping and associated site and engineering works. The subject site is located on a brownfield site in an existing urban area and is zoned and serviced for residential development. While the scale of the development on site will increase, the receiving environment (including population) forms part of an urban area where a high magnitude of change is expected and environmental effects are readily managed through planning policy and planning condition.

In this regard, Downey Planning are of the considered opinion that there will be no significant impact and very limited environmental effects (after mitigation) on the existing receiving population in due course.

4.3.2 Transfrontier Impacts

There are no transfrontier impacts associated with the proposed development.

4.3.3 Magnitude and Complexity of Potential Impacts

There are a number of existing structures on the subject site consisting of sheds to the rear of the property and remnants of Georgian houses to the front of the site, which are proposed to be demolished in order to facilitate the proposed development. These effects are proposed to be mitigated via design and planning condition. The subject site is not located on or adjoining a sensitive character area, designated Natura 2000 site and is not affected by any other relevant designations such as archaeological, architectural, preserved views or tree preservations. In this regard, the magnitude and complexity of potential impacts are considered to be minor and temporary based around standard construction phase of the proposed development.

4.3.4 Probability of Potential Impacts

During the construction stage noise, vibration, dust and traffic nuisances is likely to be the most likely potential impact. However, this will be short term and temporary and subject to an agreed construction management plan with Dublin City Council.

During the operational stage of the proposed development, it is likely that the visual impact and increased traffic will be the most probable potential impacts. However, the proposal has been designed to prevent undue impact on third party properties such as overlooking, overshadowing and loss of daylight/sunlight and in this regard any potential impact is expected to be slight given the orientation of the scheme and the inner-city Location of the site. Furthermore, the increase in traffic

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associated with the proposed development is also likely to be slight with the potential increase in traffic volumes being within the carrying capacity of the adjoining road network.

4.3.5 Duration, Frequency and Reversibility of Potential Impacts

The construction impacts are temporary in nature. The anticipated impacts at operational stage (i.e., visual and traffic) are anticipated to be permanent and irreversible but slight overall given the design and orientation of the scheme, the expected re-development of the area and the management of traffic impacts.

4.3.6 Section 171A of Planning and Development Act 2000, as amended

The effects of the proposed development on the following factors needs to be evaluated in an “environmental impact assessment” as defined under Section 171A of the 2000 Act:

- i. *“population and human health;*
- ii. *biodiversity, with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive;*
- iii. *land, soil, water, air and climate;*
- iv. *material assets, cultural heritage and the landscape;*
- v. *the interaction between the factors mentioned in clauses (i) to (IV)” (Section 171A of Planning and Development Act 2000, as amended)*

These topics shall now be considered and assessed:

(i) Population and Human Health

Population

The Core Strategy of the Dublin City Development Plan 2016-2022 seeks to accommodate an additional 59,038 people during the lifetime of the Development Plan and would require approximately 31,800 housing units to provide for the population growth. The development would result in a population in the order of 250 persons which is not considered to be significant in this context.

The proposed development is considered to be consistent with the policies of the National Planning Framework, which seeks to deliver more compact urban development with Objective 3A of the NPF stating that 40% of new homes to be constructed in Ireland’s cities are to be located within the city’s existing urban envelope.

Human Health

Having regard to the nature and use of the proposed development, any potential effects on human health are likely to arise from during the construction phase of the proposed development, as opposed to the operational phase. Such issues would include the likes of dust, noise, increased traffic and vibration impacts.

Measures to avoid, minimise and prevent construction-related impacts shall be employed by the contractor and are set out in a Construction Management Plan and Construction and Demolition Waste Management Plan included as part of this application.

At operational stage, it is not expected that there would be any risks of effects on human health. Additionally, as part of the proposed development, an entrance gateway to connect the TU Dublin Grangegorman Campus to Prussia Street is proposed. This pedestrian pathway will effectively act as a front door to the TU Dublin Grangegorman Campus and associated grounds from Prussia Street, therefore becoming a crucial link and improving permeability across the campus and through to the city. The pedestrian path will improve pedestrian and cycle safety overall and thus can be seen as having a positive effect on human health.

The site is not located within an environmentally sensitive location and as such there is very limited risk to human health in terms of flooding or from any Seveso site.

(ii) Biodiversity

OPENFIELD Ecological Services have prepared a Screening Report for Appropriate Assessment, which is included under separate cover. This confirms that there will be no adverse impact on any designated Natura 2000 sites as a result of the proposed development, either alone or in combination with other plans and projects.

(iii) Land, Soil, Water, Air and Climate

The development is located on a brownfield site that contains a number of structures which accommodate a car wash and an auto repair centre and are located to the rear of the property on lands which extend to approximately 0.38 hectares. The site is fully serviced and is not located at or adjoining a designated environmental site or on lands at risk from flooding. The subject site is located in Prussia Street (Nos. 23-28) within the city core. It is proposed to demolish the existing structures on site in order to facilitate the proposed scheme.

No significant effects are anticipated on land, soil, water, air or climate during the construction phase or operational phase of the proposed development.

(iv) Material Assets, Cultural Heritage and Landscape

Material Assets

The site is zoned for residential development under the Dublin City Development Plan 2016-2022. The development has been subject to a traffic assessment that confirms that there is capacity within the road network to accommodate the development.

An appropriate separation distance is being provided between the proposed buildings and any existing services and sewers that may traverse the site and a letter of confirmation of feasibility has been provided by Irish Water in terms of the capacity of the network.

A Daylight & Sunlight Assessment carried out by Digital Dimensions confirmed that the development will not give rise to any significant adverse effect on third parties and that the development will receive adequate light to serve the future population being proposed.

Cultural Heritage

There are no protected structures or buildings listed on the NIAH within the subject site. The historic wall of St. Brendan's Hospital, bounds the site to the east. It is proposed to carry out repair works to this wall and remove a section of it to facilitate the primary pedestrian route from Prussia Street to the TU Dublin Grangegorman Campus. There is a Protected Structure, No. 29 Prussia Street, immediately adjoining the site to the north, however the proposed works are not considered to impact on the Protected Structure. The site is within a Zone of Archaeological Interest, and thus it is recommended that the groundworks for the development should be archaeologically monitored. Given the location of the subject site in this historic area of Dublin city, as well as the extant Georgian fabric within the area, mitigation measures are necessary in order to comply with national policy guidelines and statutory provisions for the protection of archaeological, architectural and cultural heritage.

Landscape

The site is a brownfield and serviced site that currently contains a series of structures (sheds) which once accommodated a car wash and an auto repair centre towards the rear of the property. It is not located within a sensitive landscape and is not affected by any protected or preserved views or habitats. There will be a change to the scale of development proposed and as such will change the view of the site. However, in light of the fact that it is located within the city core of Dublin, the nature and scale of development in the surrounding area, and the expected re-development of the area surrounding the subject site, it is considered that this is not an adverse impact.

(v) Interaction between the factors

From the interaction between the factors considered in this EIA Screening Report, it is respectfully considered that the likely significant effects of the development are limited and, after mitigation is imposed, minor in nature, either individually or in combination with other plans and projects.

6.0 CONCLUSION

This screening report has been carried out in accordance with a methodology that is based on *Environmental Impact Assessment (EIA), Guidance for Consent Authorities regarding Sub-threshold Development (EPA, 2003)* and *The European Commission Guidelines on EIA Screening (June 2001)*.

The proposed development does not exceed any of the thresholds outlined in the Planning and Development Regulations 2001 (as amended) that would trigger a mandatory requirement to prepare

an EIAR. The proposed development is sub-threshold and therefore is assessed in accordance with Article 27 of the European Communities EIA Regulations 1989.

The proposed development will provide a total of 162 no. 'Build to Rent' units along with ancillary amenity spaces, landscaping and associated site and engineering works on a site of 0.38 hectares on lands at 23-28 Prussia Street, Dublin 7.

The majority of the impacts will occur during the construction stage and will be temporary and reversible in nature. The probable impacts associated with the operational stage are likely to be visual impact and increased traffic. However, the proposal has been designed to prevent undue impact on third party properties such as overlooking, overshadowing and loss of daylight/sunlight and in this regard any potential impact is expected to be slight given the design and orientation of the scheme. Furthermore, the increase in traffic associated with the proposed development is also likely to be slight with the potential increase in traffic volumes being within the carrying capacity of the adjoining road network. They are anticipated to be slight in nature. The Screening Report for Appropriate Assessment prepared by OPENFIELD Ecological Services, and submitted under separate cover, confirmed that the proposed development will not give rise to any significant effect on designated and protected sites.

In light of the foregoing, the proposed development is not likely to have significant effects on the environment and a full Environmental Impact Assessment Report (EIAR) is not required to be prepared as part of the SHD planning application.

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Appendix A

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Statement in accordance with Article 299(1)(b)(ii)(II)(c) of the Planning & Development Regulations, 2001 (as amended)

Directive	Assessments Carried Out	Assessments carried out as part of this application & conclusions
<p>Directive 92/43/EEC, The Habitats Directive & Directive 2001/147/EEC Birds Directive</p>	<p>The main legislation for conserving biodiversity in Ireland have been the Directive 2009/147/EEC of the European Parliament and of the Council of November 2009 on the conservation of wild birds (Birds Directive) and Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (Habitats Directive). Among other things, these require member states to designate areas of their territory that contain important bird populations in the case of the former, or a representative sample of important of endangered habitats and species in the case of the latter. These areas are known as Special Protection Areas (SPA) and Special Areas of Conservation (SAC) respectively. Collectively they form a network of sites across the European Union known as Natura 2000. The Birds and Habitats Directives have been transposed into Irish Legislation by the European Communities (birds and Natural Habitats) Regulations 2011-2015.</p>	<p>Statement of Screening for Appropriate Assessment by Openfield Ecological Services</p> <p>Construction Management Plan & Engineers Services Report prepared by Lohan Donnelly Consulting Engineers</p> <p>Public Lighting Report by Fallon Design</p> <p>It can be concluded that the possibility of any significant impacts on any European Sites, whether arising from the project itself or in combination with other plans and projects, can be excluded beyond a reasonable scientific doubt based on the best scientific knowledge.</p> <p>Progression to Stage 2 Appropriate Assessment was not required.</p>
<p>Directive 2000/60/EC, Water Framework Directive</p>	<p>The EU's water framework directive provides common principles in relation to water protections and sustainable use of water in the European Union. This directive stipulates that all water bodies were to have attained 'good ecological status' by 2015.</p>	<p>Statement of Screening for Appropriate Assessment by Openfield Ecological Services</p> <p>Construction Management Plan, Construction & Demolition Waste Management Plan & Engineers</p>

		<p>Services Report prepared by Lohan Donnelly Consulting Engineers.</p> <p>Operational Waste Management Plan prepared by Enviroguide Consulting.</p> <p>The subject site is not located within or adjacent to any surface water course.</p> <p>The surface water design for the proposed development will include collection and attenuation via a blue and green roof system.</p> <p>During construction appropriate surface water management and discharge measures will be applied.</p> <p>The proposed development will not cause any deterioration of any water body or surface water status.</p>
<p>Directive 2008/50/EC Clean air for Europe</p>	<p>The Clean air and 2008 CAFE Directive defines objectives and measures to be adopted to provide for air quality and avoid, prevent or reduce harmful effects on human health and the environment.</p> <p>Air quality objectives include:</p> <p>Measures to limit transport emissions through traffic planning and management and measures to encourage a shift of transport towards less polluting modes.</p>	<p>Traffic Impact Assessment & Mobility Management Plan prepared by Dr. Martin Rogers.</p> <p>Outline Construction Management Plan Report prepared by Lohan Donnelly Consulting Engineers.</p> <p>The development has been designed with reduced provision for car and an increased provision for sustainable modes of transport such as walking and cycling.</p> <p>A traffic impact Assessment carried by Dr. Martin Rogers indicates that the proposed development will have minimal impact upon local traffic conditions.</p> <p>The proposed development will not produce any emissions once operational. During Construction the</p>

		use of appropriate water-based dust suppression systems will reduce dust and windborne particles.
Directive 2002/49/EC Environmental Noise	This directive relates to the assessment and management of environmental noise. It is provided to avoid, prevent, or reduce the harmful effects, due to exposure of environmental noise.	<p>Outline Construction Management Plan prepared by Lohan Donnelly Consulting Engineers.</p> <p>BTR Operational Plan prepared by LIV Consult.</p> <p>During demolition and construction, all contractors and activities on site shall comply with BS 5228-1:2009 “Code of Practice for Noise and Vibration Control on Construction and Open Sites”.</p> <p>The contractor will monitor base noise levels at the site location before commencing the works on site and will thereafter continue to monitor noise levels on site during all construction phases.</p> <p>As the development is residential, it is not anticipated that it will generate any significant levels of noise that would impact nearby receptors. The Residential Management Team will monitor this during operation and provide mitigation measures where necessary.</p>
Directive 2001/42/EC, SEA Directive	Strategic Environmental Assessment (SEA) on the effects of certain plans and programmes on the Environment aims to ensure that environmental considerations are addressed in the preparation, adoption and implementation of certain plans and programmes.	<p>Statement of Consistency and Material Contravention Statement prepared by Downey Planning.</p> <p>All relevant local, national and regional plans were consulted in the preparation of this SHD planning application.</p>

	The Dublin City Development Plan 2016-2022 and National and Regional policies are subject to SEA.	<p>The Statement of Consistency outlines how this proposal complies with these policies and guidelines.</p> <p>The Material Contravention Statement outlines two areas where the proposed development is not consistent with the Dublin City Development Plan 2016-2022.</p> <p>These are building heights and car-parking standards. The statement outlines, however, the inconsistencies between local and national policy and how the proposed development complies with national policy.</p>
Seveso III Directive (2012/18/EU)	This directive was developed to avoid major accidents involving substances which could pose a significant risk to humans and the environment.	<p>The Dublin City Development Plan 2016-2022 (Appendix 12) identifies 15 Seveso sites within the Dublin City area and specific distances for each ranging from 300 -700m.</p> <p>As there are no Seveso sites within the vicinity of the proposed development, further assessment was not required.</p>
Directive 2007/60/EC, Floods Directive	This Directive provides a framework for member states to reduce the risk of floods within the EU and to map the flood extent, assets, and humans at risk.	<p>Flood Risk Assessment prepared by Lohan Donnelly Consulting Engineers.</p> <p>Review of all available flood data for the site and the surrounding area indicates the likelihood of coastal or fluvial floodwater entering the subject site to be extremely low.</p> <p>The site is therefore classified as a Flood Zone C and therefore has a low probability of experiencing a flood. Sufficient flood alleviation measures are in place to guard against any</p>

		<p>potential overland flooding from extreme pluvial events.</p> <p>The risk of flooding at this site and the risk of flooding due to the development of this site in flood events is minimal.</p>
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