

# ENVIRONMENTAL IMPACT ASSESSMENT REPORT

## NON-TECHNICAL SUMMARY

### RESIDENTIAL EXTENSION

AT

### THE FRASCATI CENTRE, FRASCATI ROAD, BLACKROCK, CO. DUBLIN



In Association with:

NMA Architects | AWN Consulting | Brady Shipman Martin | Barrett Mahony | Courtney  
Deery Heritage Consultancy | Openfield Ecology | BPG3 | ILTP

## October 2018

## Non-Technical Summary

### INTRODUCTION AND METHODOLOGY

This Environmental Impact Assessment Report (EIAR) has been prepared in support of a planning application for development which provides for a residential extension over three levels above the Rejuvenated Frascati Centre, a project that it currently at an advanced stage of construction, at Frascati Road, Blackrock, Co. Dublin.

This document is a summary of the information contained in the EIAR. For detailed information and key mitigation and remedial measures please consult the full EIAR document.

#### Purpose of the EIAR

The objective of this EIAR is to identify and predict the likely environmental impacts of the proposed development; to describe the means and extent by which they can be reduced or ameliorated; to interpret and communicate information about the likely impacts; and to provide an input into the decision making and planning process.

The EIAR is the primary element of the Environmental Impact Assessment (EIA) process and is recognised as a key mechanism in promoting sustainable development, identifying environmental issues, and in ensuring that such issues are properly addressed within the capacity of the planning system.

The objective of this EIAR is to identify and predict the likely environmental impacts of the proposed

#### The Requirement for an EIAR

The requirement for an EIAR for this project has arisen following a Section 132 request from An Bord Pleanála, which reads as follows:

*“Please submit an EIAR of the effects of the proposed development on the environment, which shall include an assessment of the cumulative impacts of the subject development and the development already authorized on the site under D14A/0134. It is considered that an EIAR is required because the development in question comes within the scope of class 13(a)(ii) of the Planning and Development Regulations 2000 (as amended), as the proposed developments results in an increase in size greater than 25% of the development already authorized and being executed on the site under D14A/0134”*

Class 13(a) states the following:

*“Class 13(a) relates to any change or extension of development already authorised, executed or in the process of being executed (not being a change or extension referred to in Part 1) which would -*

- (i) result in the development being of a class listed in Part 1 or paragraphs 1 to 12 of Part 2 of this Schedule,*
- and*
- (ii) result in an increase in size greater than – 25 per cent, or*  
*- an amount equal to 50 per cent of the appropriate threshold, whichever is the greater”*

The proposed development comprises an apartment scheme of 45 units. No increase in shopping centre floor space is proposed. In fact, a small reduction in shopping centre floorspace is proposed in the application (791 sq.m consisting of restaurant and storage floorspace at second floor level).

The following components are addressed in the EIAR:

- Introduction and Methodology,
- Project Description and Alternatives Examined,
- Population and Human Health,
- Archaeology and Cultural Heritage,
- Biodiversity,
- Landscape and Visual Impact,
- Land and Soils,
- Water,
- Air Quality and Climate,
- Microclimate,
- Noise and Vibration,
- Material Assets,
- Interactions of the Foregoing,
- Principle Mitigation and Monitoring Measures,
- Non-Technical Summary.
- Appendix 1- Daylight and Sunlight Assessment

It is necessary to examine each of these sections of the environment with respect to the impacts that the proposed development may have on them.

In addition to the components required under Schedule 5 of the Planning & Development Regulations 2001-2018, this planning application has examined a number of additional areas (such as a Transport Report, an Engineering Services Report and a Daylight and Sunlight Assessment (included as Appendix 1 of this EIAR)), which have helped inform the contents of this EIAR, and which are included as standalone reports with the planning application.

## **PROJECT DESCRIPTION AND ALTERNATIVES EXAMINED**

The proposal is for a residential development of 45 no. apartment units over 3 no. storeys, from second to fourth floor level, over the permitted ground and first floor levels of retail / restaurant floorspace and permitted lower ground floor car park. The proposal will be an extension of the Rejuvenation Scheme permitted under Reg. Ref.: D14A/0134 (which was the subject of an EIS), as amended by Reg. Ref.: D16A/0235 / ABP Ref.: PL 06D.246810, Reg. Ref.: D16A/0798, Reg. Ref.: D16A/0843 and Reg. Ref.: D17A/0599.

The proposed apartment mix consists of 3 no. 1 bed units, 36 no. 2 bed units and 6 no. 3 bed units. Balconies are provided for the residential apartments on the north eastern, north western, south eastern and south western elevations. Access to the residential units will be provided via a stair and lift core from lower ground and ground floor level. 51 no. car parking spaces within the lower ground floor car park will be allocated to the residential units. The development includes 54 no. bicycle parking spaces for the apartments, located at lower ground floor level and the proposed first floor level podium car park. The development also includes a bin store and plant area at lower ground floor level, two communal terrace areas at second floor level and roof level and plant enclosures at roof level. The development includes an associated reduction to the permitted footprint of the lower ground floor level. The proposal will result in the omission of the second floor level restaurant unit and storage floorspace permitted under the Rejuvenation Scheme.

The proposal includes a first floor level podium car park, over the permitted podium car park, located at the north west of the site, which will provide 81 no. car parking spaces. The total car parking provision for

the scheme as amended by this permission will be 604 no. spaces, which comprises of 51 no. spaces for the proposed residential units and 553 no. spaces for the permitted retail and restaurant floorspace.

The application site area is 0.625 ha.

The proposal is an extension of the Rejuvenation of Frascati Shopping Centre, which is currently at an advanced stage of construction, and which related to an overall application site area of approximately 3.41 hectares, including the Frascati Road area included in the red line boundary of that application, the development site area, i.e. excluding Frascati Road, is 2.7 hectares. The development comprises primarily of the improvement of the current retail offer within the centre, along with the inclusion of additional retail services floorspace, the provision of additional café/restaurant floorspace and the reorganisation of the current car parking provision and access and circulation system.

The basement area, which will accommodate the car parking area for the residential units, has been constructed and the replacement car parking for the retail floorspace is proposed in an additional podium level as part of this residential extension application.

This development also provided for works to the Frascati Road (N31) including access, pedestrian and cycle improvements adjacent to the application site. This will include an upgraded pedestrian crossing on the Frascati Road (N31) which will provide more convenient access between the Frascati Shopping Centre and the remainder of the core retail area of Blackrock. These works have been implemented.

The proposed retail extension scheme has been prepared in order to reflect the zoning of the subject site as a District Centre in the Dun Laoghaire Rathdown County Development Plan 2016-2022 and associated policies and objectives of the Development Plan.

### Alternatives Examined

This chapter also analyses different Options which were considered as the scheme progressed and the key considerations and amendments to the design having regard to the key environmental issues.

## **POPULATION AND HUMAN HEALTH**

The 2014 EIA Directive (2014/52/EU) has updated the list of topics to be addressed in an EIAR and has replaced 'Human Beings' with 'Population and Human Health'. This chapter also meets the requirement for assessment of 'Human Beings', as set out in Schedule 6 of the Regulations.

Population (human beings) and Human Health is a broad ranging topic and addresses the existence, activities and wellbeing of people as groups or 'populations'. While most developments by people will affect other people, this EIAR document concentrates on those topics which are manifested in the environment, such as new land uses, more buildings or greater emissions.

- Economic Activity;
- Social Patterns;
- Land-Use & Settlement Patterns;
- Employment; and
- Health & Safety.

The proposed development will result in a change in the urban environment through additional height on Frascati Road and in proximity to existing residential development, the provision of additional residential accommodation and an improved urban scale of development within this area of Dun Laoghaire Rathdown, accords with the sites district centre zoning.

The implementation of the range of remedial and mitigation measures included throughout this EIAR document are likely to have the impact of limiting any likely adverse environmental impacts of the construction and operational phase of the proposed development on population and human health.

## **ARCHAEOLOGY**

The main purpose of the archaeology and cultural heritage chapter of the EIAR is to identify the potential significance and the sensitivity of the existing cultural heritage environment with respect to the proposed development and in turn to evaluate the likely impacts of the proposed development on this environment. The appraisal was based on a desk study and field inspection of the application area and its environs.

There are no recorded archaeological monuments within the proposed development area and no stray artefacts were recorded from the study area by the National Museum of Ireland. The field inspection did not identify any features of an archaeological potential within the proposed development lands and no additional features of archaeological potential were noted from the desk study or during the site inspection.

There are no protected structures (RPS) or Architectural Conservation Areas within the ownership boundary of the Frascati Shopping centre. The development lies in close proximity to the Protected Structures on Mount Merrion Avenue and on Georges Avenue. The development will be substantially hidden from view along Mount Merion Avenue, a view of the new development will only be available at the junction of Frascati Road. This view does not contribute to the 19th century character or significance of Mount Merrion Avenue, the development will not compete with the building line, scale or presence of the terrace or the church. There will be a visual change to the rear of 8-16 Mount Merrion and St Andrews Church, this view was substantially altered in the past by the development of Lisalea apartments and by the existing shopping complex and is not a view that contributes to or supports the special character or protected structure status of the terrace.

The proposed residential development will not be visible from Georges Avenue or from the three protected structures located along it.

The proposed residential extension of the permitted rejuvenation of Frascati Shopping Centre will have no impact on the special architectural/ historical and social interest of the protected structures in its environs.

As part of the general rejuvenation currently underway along the Frascati Road, the Blackrock Shopping Centre and the former Enterprise House developments are in keeping with the emerging development of the area. The proposed residential extension viewed in combination with these developments will not cumulatively impact on the protected structures or the existing cultural built heritage environment.

The only surviving architectural fragments associated with Frascati House are granite gate piers that once flanked the northern pedestrian entrance to the existing shopping centre along with a later plaque commemorating Lord Edward Fitzgerald. These are being retained on site for safe keeping during construction and will be reinstated at the new plaza / landscaped area along the Frascati Road frontage in accordance with the requirements of Condition 3 of the parent permission. They will provide a brief historical context of Frascati House and its association with Lord Edward Fitzgerald.

## **BIODIVERSITY**

An assessment of the biodiversity present on the proposed development site was undertaken by Openfield Ecological Services. The proposed development site is within or directly adjacent to any area designated for nature conservation. The closest designated sites are the South Dublin Bay cSAC/pNHA (216) and the South Dublin and River Tolka Estuary SPA (4024). These are both located c.0.3km to the

east and downstream of the subject lands, and potentially linked to them via the Priory Stream which flows under the subject lands, and discharges into both European Sites downstream.

Habitats recorded during a site visit in October 2018 were entirely composed of hard surfacing with minimal cover of vegetation. These habitats are of negligible biodiversity value. Fauna surveys included bat surveys of the site in 2011 and 2013. There are no suitably bat roosting spaces while the features on the site do not provide resources for foraging bats. There are no alien invasive species on the site.

The proposed development is not predicted to have any significant negative effects to biodiversity. An analysis of the potential impacts to Natura 2000 areas in Dublin Bay found that significance adverse effects to these intertidal habitats were not likely to occur.

## **LANDSCAPE AND VISUAL IMPACT**

The Frascati Shopping Centre site is part of an established and continually evolving urban locality that includes shopping centres, commercial and residential development, and roads and streets. The original shopping centre was centrally located within the site and surrounded by circulation roads and car parking. More recently, the centre has been the subject of substantial transformation with construction of the permitted Rejuvenation Scheme now at an advanced stage of construction.

The northern, western and southern boundaries of the site/shopping centre are enclosed by residential properties off Mount Merrion Avenue, Frascati Park and George's Avenue, respectively. Lisalea apartments overlook the northern carpark from the outside the northeast corner of the site.

The eastern side of the site is defined by the N31 Blackrock Bypass, which, up until recent years, presented strongly as a vehicle priority and dominated roadway that had the physical and perceived effect of severing the Frascati Centre from the Blackrock Centre and Village on the eastern side of the road. Upgrade works to the road have substantially improved the pedestrian, cycle and public transport offer of the roadway, and with high quality pedestrian crossings, there is a stronger sense of connection between both sides of the road. Taken together with the emergence of the Rejuvenation Scheme, and substantial redevelopment of the eastern side of the road, the Frascati Road is developing more of a street-like character, with stronger built frontage and animation along the street.

As an established shopping centre with surrounding carparks, and with the permitted Rejuvenation Scheme at an advanced stage of construction, the site itself is not of particular significance. Similarly with redevelopment on the eastern side of the N31, the N31 is not of particular significance. The site development site does have important urban street frontage to the N31 Frascati Road and existing mature trees located along the western and southern boundaries of the site help protect adjoining residential character of peripheral streets and are important in providing visual screening from properties into the site area.

Therefore particular landscape / townscape sensitivity relates to:

- the presence of adjoining residential properties to the north, west and south, including potential visual impact from same;
- the existing belt of mature trees located along the southern and western boundaries of the site, and
- the proposed treatment of the interface with the N31.

A series of Photomontages were prepared in order to illustrate the physical and visual nature of the existing and proposed development. These are included as Appendix 7.1 in the main body of the EIAR.

There are glimpse and more open views are available from the rear of properties at the northern end of Frascati Park and along Mount Merrion Avenue, including Lisalea, these properties are setback from the new development and already have views over existing surface and deck car parking. Construction stage impacts are likely to be most significant from these properties; however, such impacts are temporary / short-term and will tend to change with the different stages of construction. It is noted that works to the northern carpark, including provision of the additional podium level structure will be openly visible from the rear of upper floors of these properties, and that perimeter parapet walls and trellis landscaping will mitigate its appearance.

Views from properties along Frascati Park and George's Avenue are unlikely to be altered to any appreciable extent in general, particularly given the retention of the existing trees and the relatively minor works proposed to the southern and western aspects of the existing centre. Where George's Avenue joins the N31, there are a number of residential properties that will experience greater effects as the proposed extension increases the height of the permitted development in the vicinity of these properties. Nonetheless, the existing mature boundary trees will provide substantial screening from these properties, particularly in summer when trees are in leaf, and to a lesser extent during winter when views will be filtered. The position of the proposed development to the north of the residential properties is such that sunlight obstruction and overshadowing will be negligible. Construction stage impacts will be more significant from these areas as construction activity will be apparent and audible, however, such impacts are temporary / short-term and will tend to reduce as the construction stages near completion.

It is considered that the proposed development respects existing sensitive features, including the mature trees, and the objective for their protection and retention, as well as the amenity of adjoining residential properties.

The scheme further delivers on the aims for rejuvenation of the centre, strengthening the mixed use profile of the area, and for provision for greater pedestrian linkage and animation. The scheme has no impact on Blackrock Park.

The principal mitigation measures have involved mitigation by avoidance in the planning design and layout of the scheme. These measures are discussed in detail in the EIAR.

## **LAND AND SOILS**

This chapter of the EIAR has been prepared by Barrett Mahony Consulting Engineers and assesses the impacts of the proposed apartment development at the Frascati Shopping Centre, Blackrock in tandem with the current development on site, on the land and soils on the site and in the surrounding area. This chapter is informed by the 2015 geotechnical site investigation, which is appended to the chapter, as well as an extract from the National Bedrock Aquifer Map. The current development on site has as of now, October 2018, reached a point where any further impact on land and soils will be minimal. The proposed apartments on top of the centre and associated car parking deck will have a negligible impact on land and soils. A series of construction, operational and monitoring measures are recommended. No adverse impacts have arisen or are likely to arise provided the mitigation and monitoring measures are undertaken.

## **WATER**

This chapter of the EIAR has been prepared by Barrett Mahony Consulting Engineers and assesses the impacts of the proposed apartment development at the Frascati Shopping Centre, Blackrock in tandem with the current development on site, on the water supply network, surface water drainage network & foul water drainage network on the site and in the surrounding area. The impact on water related assets during the construction and operational phases is assessed and a series of mitigation and monitoring

measures are recommended. The current development on site has as of now, October 2018, reached a point where any further impact on water will be minimal. The proposed apartments on top of the centre and associated car parking deck will have a negligible impact on water. This chapter does not envisage any long term adverse impacts on water supply, surface water or foul water as a result of the proposed development provided the mitigation and monitoring measures are adhered to.

## **AIR QUALITY & CLIMATE**

In terms of the existing air quality environment, data available from similar environments indicates that levels of nitrogen dioxide (NO<sub>2</sub>), particulate matter less than 10 microns and particulate matter less than 2.5 microns (PM<sub>10</sub>/PM<sub>2.5</sub>) are, generally, well within the National and European Union (EU) ambient air quality standards.

An assessment of the potential dust impacts as a result of the construction phase of the proposed development was carried out based on the UK Institute of Air Quality Management (IAQM) guidance. This established the sensitivity of the area to impacts from construction dust in terms of dust soiling of property and human health effects. The sensitivity of the area was combined with the dust emission magnitude for the site under two distinct categories: construction and trackout (movement of vehicles) in order to determine the mitigation measures necessary to avoid significant dust impacts. Once mitigation measures are implemented the impacts to air quality during the construction of the proposed development are considered, *short-term* and *not significant*, posing no nuisance at nearby sensitive receptors.

The best practice dust mitigation measures that will be put in place during construction of the proposed development will ensure that the impact of the development complies with all EU ambient air quality legislative limit values which are based on the protection of human health. Therefore, the impact of construction of the proposed development is likely to be *short-term* and *imperceptible* with respect to human health.

Based on the scale and temporary nature of the construction works, the potential impact on climate change and transboundary pollution from the construction of the proposed development is deemed to be *short-term* and *not significant* in relation to Ireland's obligations under the EU 2020 target.

Potential impacts to air quality and climate during the operational phase of the proposed development would be as a result of increased traffic volumes on the local road network. The changes in traffic flows were assessed against the UK Design Manual for Roads and Bridges (DMRB) screening criteria for an air quality assessment. As the changes in traffic did not meet the screening criteria no air quality assessment was required, and it can be determined that the operational phase of the proposed development will have an *imperceptible* and *long-term* impact on air quality and climate.

A dust minimisation plan will be implemented during the construction phase of the proposed development to ensure that no significant dust nuisance occurs outside the site boundary. No mitigation is required during operation.

## **MICROCLIMATE**

This Chapter assess the Microclimate impacts, with a specific focus on wind-speed, using a qualitative assessment methodology to undertake a risk assessment of the potential risks of elevated wind-speed associated with the proposed residential extension to the rejuvenated Frascati Centre.

The aim of the assessment was to determine if there was considered to be a risk of elevated wind-speeds occurring at ground level as a result of the proposed residential development at the Frascati Shopping Centre.



The proposed residential extension to the rejuvenated Frascati Shopping Centre is still considerably less than 10 storeys and is not classed as a high building. It can be concluded that the proposed development at the Frascati Centre is therefore not a high building and that its shape will not lead to a significant acceleration of wind-speeds.

The space between the Blackrock and Frascati Shopping Centres was examined and was also found not to be of a width which would lead to acceleration of windspeeds. It was concluded that the proposed development would have no significant impact on windspeeds in the area.

## **NOISE & VIBRATION**

The existing noise climate has been surveyed during both daytime and night-time periods and has been found to be typical of a suburban area. Prevailing noise levels are primarily due to local road traffic movements with some contribution from operational activities from the existing Frascati Centre including plant noise emissions and vehicles entering the site.

The potential noise & vibration impact on the nearest noise sensitive locations were assessed for the short-term construction phase and the longer term impact of the operational phase once the rejuvenated scheme and proposed residential extension is in operation.

Subject to good working practice during the construction phase and not exceeding any limits proposed within the EIAR, it is anticipated that noise and vibration will not cause any significant impact or noise and vibration nuisance. During the operational phase, the key potential noise sources including increased in road traffic and mechanical plant noise emissions have been assessed. The assessment has indicated that subject to the implementation of the mitigation measures proposed within the EIAR, none of these will increase the existing noise climate sufficiently so as to be likely to cause a disturbance. Noise levels during the operation of the rejuvenated scheme is predicted to nominally remain unchanged when compared to the existing scenario and are all within the recommended noise criterion for day and night-time periods.

## **MATERIAL ASSETS**

Material Assets considers physical resources in the environment which may be of human or natural origin. The objective of the assessment is to ensure that these assets are used in a sustainable manner, so that they will be available for future generations, after the delivery of the proposed development.

In accordance with the 2017 Draft EPA Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, "*Material assets can now be taken to mean built services and infrastructure*". Material assets of a natural origin are dealt with comprehensively within the other chapters of the Environmental Impact Assessment Report.

This chapter considers the key aspects relating to material assets of a human origin of the proposed development site and the surrounding area, namely traffic infrastructure, potable water supply, wastewater discharge, electricity and gas supply.

The Material Assets chapter describes existing services to the application site and describes the predicted impacts which the development may have on these services and recommends mitigation measures.

The proposed development will have a positive impact on the existing urban environment by creating high quality residential units to respond to current housing need and to cater for the needs of a growing population on district centre zoned lands, immediately adjacent to a high quality public transport corridor.

This chapter concludes that there is unlikely to be any significant adverse impacts on material assets as a result of the proposed development during the construction or operational phase of the development.

## **INTERACTIONS BETWEEN ENVIRONMENTAL FACTORS**

The purpose of this chapter of the EIAR is to draw attention to significant interaction and interdependencies in the existing environment. John Spain Associates in preparing and co-ordinating this EIAR ensured that each of the specialist consultants liaised with each other and dealt with the likely interactions between effects predicted as a result of the proposed development during the preparation of the proposals for the subject site and this ensures that mitigation measures are incorporated into the design process. This approach is considered to meet with the requirements of Part X of the Planning and Development Act 2000, as amended, and Part 10, and schedules 5, 6 and 7 of the Planning and Development Regulations 2001-2018. The detail in relation to interactions between environmental factors is covered in each chapter of the EIAR. The detail in relation to interactions between environmental factors is covered in each chapter of the EIAR.

## **SUMMARY OF EIA MITIGATION AND MONITORING MEASURES**

This chapter provides a summary of all the design, construction and operation mitigation measures proposed throughout the EIAR document for ease of reference for the consent authority and all other interested parties.

## **APPENDICES**

### **DAYLIGHT AND SUNLIGHT ASSESSMENT**

The application / appeal response is accompanied by a Daylight and Sunlight Assessment, which is also included as Appendix 1 of the EIAR. The assessment describes how the proposed development impacts upon the sunlight/skylight amenities on neighbouring properties and impacts on neighbouring gardens. Below is a summary of the assessment results.

In terms of the Skylight Assessment, results of the assessment state:

*“The result indicate that the proposed development will not impact in any material way on the skylight conditions available to neighbouring residences.*

*Of the 24 test points analysed in this study, all 24 of them have been found to meet or exceed the minimum levels recommended by the BRE”.*

In terms of Sunlight Assessment, the results of the assessment state:

*“The results calculated for sunlight also indicate that the proposed new building will not impact in any material way on the sunlight condition available to the neighbouring residences.*

*Of the nine points assessed in this study, all nine of them have been found to surpass the minimum percentage of Annual and Winter Probable Sunlight Hours recommended by the BRE”.*

In terms of impact on neighbouring gardens, the report demonstrates that full compliance has been achieved at all three of the gardens assessed and no material loss of sunlight amenity can be anticipated as a result of the proposed development.

The assessment concludes stating the following in relation to the proposed development:

*“The results of this assessment demonstrate that the proposed new development is in full compliance with the BRE guidelines. It follows from this finding that **no significant loss of daylight amenity** can be expected to register at any of the neighbouring residences.” (Emphasis Added)*

It is submitted that appropriate design measures have been considered by the design team, including the layout, location and setbacks of the proposed residential units, to ensure no adverse impacts on neighbouring properties arise as a result of the proposed residential extension to the Rejuvenation of Frascati Shopping Centre, whilst providing a commercially viable residential development at an appropriate scale and design.

Thus, it can be concluded that the proposed development will not have an adverse impact in terms of loss of daylight and sunlight of adjacent residential properties.

## **CONCLUSION**

The proposed development represents an appropriate residential extension to the rejuvenated Frascati Centre development, which is currently at an advanced stage of construction, on lands which is designated for District Centre uses and which is located in an area with significant existing population. It is considered that the proposed development accords with national, regional and local planning policy.

The EIAR has shown that, subject to the implementation of the mitigation measures and appropriate monitoring, there will be no significant long term adverse impacts on the environment as a result of the development proposal.