

3 DESCRIPTION OF PROPOSED DEVELOPMENT

3.1 Introduction

This chapter of the EIAR provides a Description of the Proposed Development which will be assessed as part of the EIA process.

The Description of Development provides details of this project which requires planning consent. It includes a description of the location of the project and its physical and environmental characteristics.

In line with the EIA Directive a description of the application site, design, size and scale of development are also discussed within this chapter. Consideration is also given to all relevant phases of development from construction through to operation. This chapter provides a broader summary description of the proposed development that is the subject of this EIAR. The environmental impacts of the proposed development are then examined for each of the prescribed environmental topics discussed in turn under Chapters 6 – 20. Mitigation measures are set out in each EIAR chapter. The cumulative development impacts and interactions are set out in Chapter 21: *‘Summary of Cumulative and Interactive Effects’*.

This Chapter of the EIAR has been prepared by Eleanor Mac Partlin, EIAR Manager, with assistance from Conor Auld, EIAR Co-ordinator both from Stephen Little & Associates, Chartered Town Planners and Development Consultants. Eleanor is the Associate Director of Stephen Little and Associates and has significant experience in the management and delivery of complex multidisciplinary projects, with particular experience in Town Planning and EIA. Conor has over 5 years professional experience in town planning, including large scale residential projects requiring environmental impact assessment considerations. Conor is a Member of the Irish Planning Institute.

The Description of Development in Section 3.3 should be read in conjunction with the plans and particulars submitted with the SHD Planning Application.

3.2 Site Context & Location

While the proposed development is contained within the eastern apex of the site (as delineated by dashed green line), the red line boundary is extended to match the planning unit ABP-306569-20. This is in recognition of the fact that the proposed development is intrinsically linked with the consented development subject of that application.

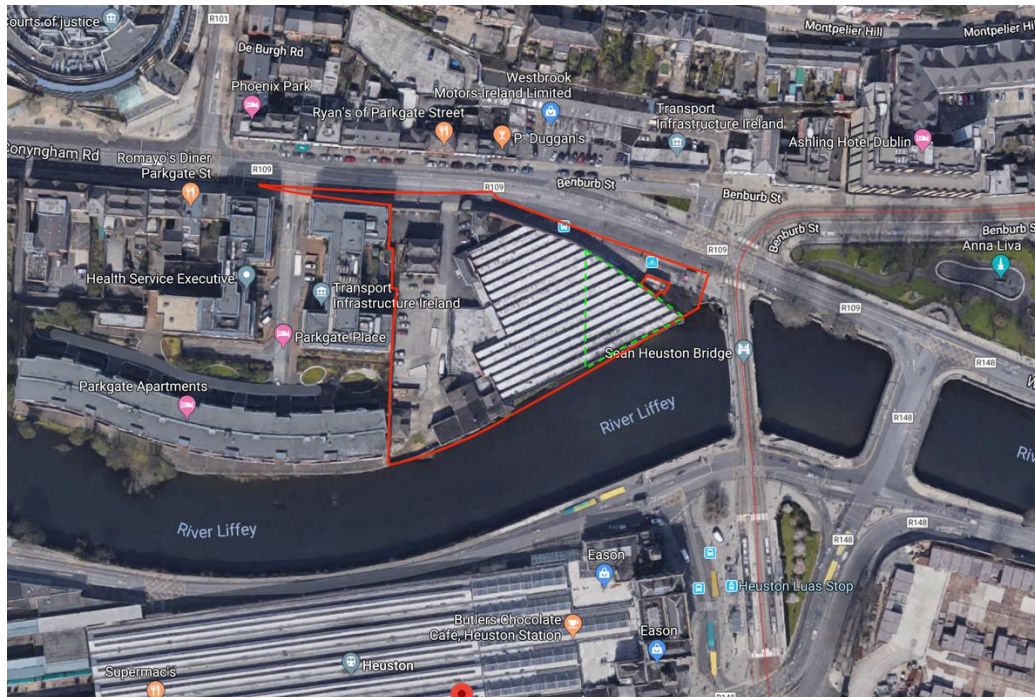


Figure 3.1: Subject site outlined in red (green for the area subject to these proposals -Approximate Overlay by SLA) Please refer to the enclosed Site Location Plan prepared by Reddy Architecture & Urbanism for the definitive red line boundary of the subject site.

The application site is a brownfield site, last occupied by Hickey's Fabrics warehouse and main office. The site was formerly in use by Hickey's Fabrics and is currently unused. It benefits from planning permission granted in May 2020 (ABP-306569-20) for a mixed use development, which excludes the Block A tower.

The ABP-306569-20 planning unit (0.82 ha) is generally bounded by Parkgate Street to the north, the River Liffey to the south, the junction of Sean Heuston Bridge and Parkgate Street and a small electricity substation to the east, and a four-storey office development (Parkgate Business Centre) and five-storey apartment scheme (Parkgate Place) to the west. Heuston Station is on the opposite side of the River Liffey to the south of the site. There are traditional two and three storey terraced buildings on the northern and southern sides of Parkgate Street; the Ashling Hotel (six storey) and a car showroom are located to the north east of the site.

The site is centrally located at the western termination of the city quays, in an historic area of the city and at a major transport hub. The site presents a unique opportunity to provide a residential-led mixed-use development which will contribute to the revitalisation and regeneration of this site and within the Heuston environs gateway. This is a unique site in the city given its location which affords extensive street frontage on Parkgate street and a south facing boundary along the river Liffey.

The application site is easily accessible on foot, being within walking distance of most of the key retail, employment and recreational amenities of the city centre. The site is close to various healthcare services, including St. Patricks University Hospital and St. James' Hospital. The area is also well served by legal and administrative services, with the new Criminal Courts of Justice, the Four Courts and Dublin City Council Civic Offices all a short distance away.

The site is proximate to cycle facilities along the quays and to a number of Dublin Bike Stations including Parkgate Street, Heuston Bridge South and Heuston Bridge North. As part of the permitted scheme the Heuston Bridge North bike station will be relocated to accommodate the proposed redevelopment of the application site. The operators (JCDecaux) will agree the relocation of the bikes station with Dublin City Council.

The site is within walking distance of a number of significant public transportation services, including Heuston Station Intercity Railway Station, Heuston Red Line LUAS stop (linking to Connolly Station) and numerous Dublin bus services which operate on Parkgate Street and the City Quays (route no's 25, 25a, 25b, 26, 66, 66a, 66b, 66e, 67, 69 and 145). The application site is easily within walking distance of most of the key amenities of the city centre.

Significant historic features include the City Quays, Heuston Station, Dr Steeven's Hospital, the Royal Hospital Kilmainham, the Guinness Brewery, Collins Barracks, Phoenix Park (including the Wellington Monument) and other protected structures along Parkgate Street. Consequently, the site also lies adjacent to an excellent range of cultural and recreational amenities.

The Phoenix Park is within 500m from the site and is a large urban park of 707 hectares comprising of woodlands, ponds and walk and a wide range of amenities including Sports clubs, Dublin Zoo and bike rentals. Collins Barracks contains the Museum of Decorative Arts along with Courtyards and Gardens and is located within 500m from the site. The Irish Museum of Modern Art is a 1.1km walk from the site. It contains flower gardens, walks and the art museum within its walls and hosts a number of different events throughout the year. The Irish National War Museum is another park near the site, a 2.5 km walk from Parkgate Street. It has access to walks along the river Liffey, around the monuments and to hurling grounds. Parkgate Street itself provides a (pedestrian and bicycle) route to the boat clubs at Islandbridge, west of the site (UCD & Trinity boat clubs, Neptune, Garda Boat Club), part of the sporting and university culture in this part of the city. The Colours Boat Race between UCD and Trinity is an annual event on the Liffey.

The application site lies within a Conservation Area, designated in the Dublin City Development Plan.

3.3 Characteristics of the Proposed Development

3.3.1 General Description of Proposed Development

This proposed Strategic Housing Development (SHD) application is for a mixed-use residential building, at 42A Parkgate Street, Dublin 8. At the outset, we confirm that the Applicant is seeking permission only for the proposed tower and associated interface works, which sits within the context of the otherwise consented residential-led mixed use redevelopment of this site (ABP Ref. 306569-20 refers).

In brief, permission is sought for Strategic Housing Development, with a life of 8 years, at 42A Parkgate Street, Dublin 8, for development comprising:

A 30-storey residential building ('Block A') (c.14,364 sq m gfa), including residential, café/restaurant, replacement office use and ancillary accommodation and works, located in the eastern apex of the site subject of otherwise consented development under ABP-306569-20.

The proposed new Block A building accommodates:

- 198no. 'Build To Rent' residential apartments (73no. studios, 97no. 1-bed, 27no. 2-bed & 1no. 3-bed) from 1st to 27th floors inclusive, including 53no. units with 'winter garden' balconies on the building's eastern elevation.
- Ancillary internal (c.384 sq m) and external (c.255 sq m) residents' private communal amenity areas and facilities, including ground floor reception/concierge area, lounge bars at mezzanine and 9th floors, roof gardens at 9th and 28th floors, and access to other residents' private communal amenity areas within the consented scheme ABP-306569-20.
- 1no. café/restaurant (c.223 sq m) at ground floor. Replacement office floor area (c.595.6 sq m total) accommodated between 1st and 8th floor levels of Block A.

- Ancillary residential bicycle storage (22no. spaces), refuse, circulation and plant, and non-residential back of house and circulation areas at ground and mezzanine floors.
- Building Maintenance Unit (BMU) at roof level.

Ancillary and associated site works and other structural and landscape works are proposed to tie the proposed new Block A building in with the consented development (ABP 306569-20). Proposed amendments to the consented scheme, include:

- At the interface of proposed Block A with the consented Block B2 office building:
 - a reduction by c.909 sq m total of office floor area over 6 floors within the consented Block B2 office building;
 - a reduction by c.35 sq m of external residential amenity and associated minor amendments to landscaping at roof level of consented Block B2; and,
 - localised changes to the northern Parkgate St façade of the consented Block B2 to include a shadow gap at its junction with proposed Block A.
- 16no. additional bicycle parking spaces accommodated within consented Block B1 undercroft area.
- Minor localised amendments to adjoining consented public realm area to tie in with proposed Block A at ground level.
- New telecommunications infrastructure at roof level of consented Block B1, including: 4no. 300mm microwave link dishes mounted on 2no. 2m high steel poles fixed to the consented lift shaft overrun, housed within GRP radio friendly shrouds, to mitigate potential for interference with existing telecommunication channels.

The site within which the proposed works sit, benefits from extant permission for residential-led mixed use strategic housing development under ABP 306569-20 (i.e. the consented development). Permission is not being re-sought for the consented development.

For avoidance of doubt, while the red line site boundary is drawn around the entire planning unit of ABP Ref. 306569-20, the development works for which permission is expressly sought are identified with a green dashed line, within the wider red line planning unit.

The overall site (c.0.82 ha) is principally bounded by Parkgate Street to the north, the River Liffey to the south, an existing electricity substation and the junction of Sean Heuston Bridge and Parkgate Street to the east, existing Parkgate Place office and residential development to the west. The application site includes areas of public footpath and roadway on Parkgate Street and a small landscaped area at the junction of Sean Heuston Bridge and Parkgate Street. There are Protected Structures on site.

Section 3.4 (below) provides a further detailed description of the characteristics of the Proposed Development.

3.3.2 Layout & Design

The building design provides a building of elegant curvature responding to both the permitted scheme (ABP. Ref. 306569), while also referencing the historic line of the site boundary. Formed by three curved planes the proposed development has no 'back' and has exceptional architectural character from every angle. The building opens up the corners of the triangle pulling in views of the surroundings. The simple curvature softens the middle of the building, but the as the plane extends beyond the roof a dynamic relationship is shown in the varying plane heights.

The top of the proposed building features a distinct 'crown' which extends the façade up the reconstituted stone piers form a trio of colonnades with varying heights.

The arrangement of the ground floor plan responds to the direction of travel from the city. The resident's entrance and lounge are the first entrance facing East. This creates a focal point to the scheme as pedestrians move through the pocket garden on the main approach. The courtyard to the

west forms part of the public offering of the overall masterplan. By opening the whole of this façade, the building looks to achieve continuous activity to the space, with visibility through from Parkgate Street all the way out the Liffey.

The core and back-of-house areas have been reduced as much as possible carving them into a space that reduces street frontage and maximises the amount of glazing.

The curvature of the building is reflected in the ground floor plan allowing areas of the river walk to expand and open out. Reconfiguring the ground floor allows natural surveillance to the river walk and a more generous and usable public space.

The space between the tower and the river wall has been extended out to c.5m to enhance the public river walkway with its important views out onto the Liffey. In doing so it creates spill out spaces available for the resident's lounge and commercial unit.

The proposed development (Block A) interfaces with the permitted 6-storey office building (Block B2) that sits above ground and mezzanine levels at the main site entrance to the public plaza, within the consented development (ABP Ref. 306569-20 refers). In planning application ABP-306569-20, Block A was physically connected to Block B2 (office). Some reconfiguration of the permitted Block B2 at this point of interface is therefore necessary as part of the new proposal for the Block A building. The resultant net loss of office floor area within consented Block B2 is $(-909 + 595.6 =) -313.4$ sq m. It may also be noted that the consented Block B2 office floor levels are not equivalent to the proposed Block A floor levels, due to differences in floor to floor heights between commercial and residential buildings. The proposed interface between Blocks A and B2 is illustrated in the Architect's Design Statement.

Some further amendments to the consented landscape works are also proposed to tie proposed Block A into the permitted public realm areas at ground level, and to the residential communal external amenity space otherwise consented at the roof level of Block B2. Some additional bike parking spaces are also proposed within the undercroft basement area of consented Block B1. A revised telecoms antennae proposal is made also at roof level of Block B1, having regard to Condition 17 of ABP-306569-20.

The proposed scheme provides a high quality, architecturally designed scheme within a landscaped setting, at a site that is extremely well connected to public transport and local facilities that supports this density residential development. The proposed scheme has had regard to National, Regional and Local Planning Policy, as well as Ministerial Guidelines such as the Apartment Guidelines and the Building Height Guidelines.

An Urban Design Statement has been prepared by Reddy Architecture + Urbanism in association with Glenn Howells Architects to accompany this application. This sets out the architectural design approach to place making at this site and how this has been informed by:

- The site context and existing development.
- The planning precedent set by the extant permission.

A detailed Housing Quality Assessment has been prepared by Reddy Architecture + Urbanism to accompany this planning application, demonstrating the full compliance of the proposed apartment units with the relevant residential amenity standards.



Figure 3.2: 3D Image of the proposed Block A, showing the context of the approved Blocks B and C to the rear.

3.3.3 Materials Strategy

Section 5.5 to 5.9 and Section 8.14 of the Architects Design Statement and Section 3 of the Response Document, prepared by Reddy Architecture and Urbanism in association with Glenn Howells Architects provides details of the facade materials proposed. A mixture of reconstituted stone cladding and curtain wall glazing have been chosen to provide a finish of the highest quality, befitting of a landmark building at this location.

The main intent of the architectural design is to create an exceptional, beautiful, refined and elegant building appropriate for this gateway site, which will contribute to Dublin's unique cityscape. Formed by three curved planes, proposed Block A is richly detailed and its masonry façades are designed to be durable and weather well. Based on the constructive engagement with DCC to date, reconstituted stone cladding and curtain wall glazing has been chosen as the predominant materials for the proposed Block A tower building.

Reconstituted stone has been chosen for its strength, adaptability and quality of textures, while stimulating the appearance of natural stone. Panels are of the highest quality, low-maintenance, durable, fire-resistant, energy efficient and they benefit from good acoustic quality. The reconstituted stone panels showcase the architectural excellence, curvature, deep reveals and sculptural

articulation of the proposed building. The deep reveals are also functional in providing solar shading. The granite mix adds complex tones, colour and texture.

The articulated middle references the surrounding architecture and the lantern top creates a landmark image. The proposed curtain wall glazing then assists in streamlining the building components from base to articulated middle and crown. Glazed intersections, between the panels extending above the base, open out to provide excellent views across the city for prospective residents. The chamfered corners and individual tilted windows express the residential nature of the proposed tower, unlike the huge surfaces of unbroken curtain walling more characteristic of commercial towers.

Following the pre-application advice of Dublin City Council, a 600mm high frit has been added to the glass of the 'winter gardens' serving the proposed residential apartments located on the eastern corner of the building. This obscures the interior of the apartments to enhance privacy and to lower the potential visual impact of domestic 'clutter' within the apartments. This move aims to maintain the floor to ceiling aesthetic, improve privacy and help reduce potential for overheating through solar gain.

The curvature of the building is reflected in the ground floor plan allowing areas of the river walk to expand and open out. The reconfiguring of the Block A footprint allows for enhanced passive surveillance of the river walk and a more generous and usable public space. A key design driver for the ground floor level was to achieve a transparent base. Limiting the amount of metalwork at the base of the proposed building is key to achieving the open feel from street level. The glazing is set into a dark polished concrete upstand that runs around the bottom of the block. This is done to build in a level of additional durability, helping with cleaning and day-to-day life of the building.

We refer the Board to the Landscape Design Report prepared by Mitchell and Associates for details of the proposed amendments to materials used within the open spaces, paved areas and boundaries, to facilitate the tie in of proposed Block A with the consented scheme.

We also refer the Board to the accompanying Building Lifecycle Report, prepared by Aramark. This report contains an assessment of long-term running and maintenance costs of the proposed development. On foot of this assessment, the Applicant proposes specific measures (contained in the report) to effectively manage and reduce costs for the benefit of residents.

3.3.4 Interface with Permitted Scheme

The application site is a brownfield site, formerly in use by Hickey's Fabrics and is currently unused.

On 28 May 2020, an Order was made by the Board confirming a split decision (ABP Ref. 306569-20 refers), to:

- Grant Permission for 321no. 'BTR' residential apartments, ancillary residents' amenity facilities, commercial office (c. 3,698 sq m), retail (c. 214 sq m) and café/restaurant (c. 236 sq m), accommodated in 5no. blocks ranging from 8 to 13 storeys (c. 31,146 sq m) over ancillary basement area, and all associated and ancillary conservation, landscaping and site development works.
- Refuse Permission for a 29-storey 'Block A' (12,207 sq m gfa), accommodating 160no. 'BTR' residential apartments, ancillary residents' amenity areas and roof gardens, 1no. café/restaurant (c. 208 sq m) and ancillary plant/storage.

The heritage significance of some of the existing buildings and structures on the site of the consented scheme (Reg Ref. ABP-306569-20), as well as the significance of the site within the Conservation Area along the Liffey banks, is well understood. The conservation, repair, refurbishment and adaptive reuse of the Protected Structures in situ forms part of the consented scheme. Other late 19th century buildings and features of historic interest (not protected structures) are also to be integrated into the consented development. The bracing of the river wall against the proposed new building is to be in the same manner as consented under ABP-306569-20, in so far as it affects the river wall. For the avoidance of doubt, the proposed development subject of this application does not involve works to

Protected Structures or other historic buildings / structures. This is covered by the consented scheme under ABP-306569-20.

In the case of the current SHD application, permission is sought only for a new 30 storey tower (Block A), at the location of the refused tower, including 198no. BTR apartment units, additional ancillary internal (c.384 sq m) and external (c.255 sq m) residential amenities, a café/restaurant (c.223 sq m), and replacement office floor area (c.595.6 sq m) at its new interface with consented Block B2 office building. Associated works shall include amendments to the consented office building (B2) and public realm, required to manage their interface with the new Block A building. Provision of an additional 16no bicycle parking spaces within the undercroft basement area of consented Block B1, as well as 22no. bicycle spaces within the proposed tower. Provision of a telecoms booster antennae at roof level of the consented Block B1.

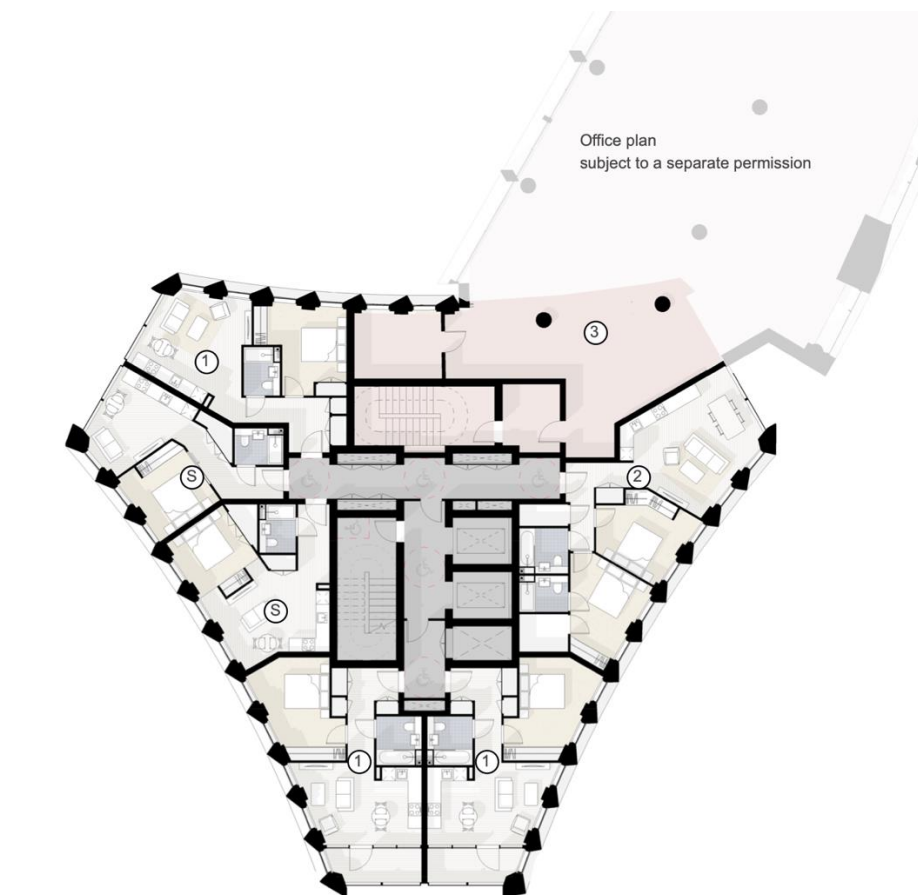


Figure 3.4: Interface of proposed Block A with permitted Block B2

3.3.5 Residential Development – Unit Mix

The proposed and consented development will deliver a high-quality architectural design solution for the delivery of sustainable residential-led mixed use development at this city centre location.

198no. Build-to-Rent apartment units are proposed in Block A. Unit sizes range primarily from studio, 1-bed (2 person) and 2-bed (4 person) units. A 3-bed penthouse unit is also proposed.

The proposed units deliver a variety of internal floor areas, to accommodate a range of household sizes primarily, from single person to 4-person (see Table 3.1 below). As described in the Architects Design Statement (Section 5.4), the proposed floor plans are capable of future adaptability to create larger units without requiring consequent alteration to the building façade.

Apartments			
Unit Type	No. of Units	Approximate GFA (m ²) / Unit	Min. Size – Guidelines 2020
Studio Apartment	73	38 sq m- 39 sq m	37 sq m
1 Bed Apartment – 2 person	97	46.3 sq m – 50.7 sq m	45 sq m
2 Bed Apartment – 4 person	27	74.3 sq m	73 sq m
3 Bed Apartment	1	100.7 sq m	90 sq m
Total	198		

Table 3.1: Breakdown of Proposed Units

Site plans, floor plans and elevations relating to units at all levels, a Schedule of Accommodation and Housing Quality Assessment Report have been prepared by Reddy Architecture and Urbanism and are enclosed with this application. These provide detailed information about the proposed residential accommodation.

77% of the proposed units are dual aspect, and none are single aspect north facing units. Apartments at upper levels benefit from excellent views across the city, along the River Liffey and over Phoenix Park.

53no. apartments have individual private ‘winter garden’ balconies. All apartments benefit from convenient access to internal and external private amenity areas serving Block A. They will also have access to the range of private communal residential and public amenity open space consented under ABP-306569-20. For further details on residential amenities, we refer the Board to the architectural plans, Schedule of Areas, Section 7.1 of the Architects Design Statement, and the Response to An Bord Pleanála Opinion Document, prepared by Reddy Architecture and Urbanism in association with Glenn Howells Architects, which all accompany the planning application.

These details can also be found in the Schedule of Accommodation and Housing Quality Assessment, together with the Apartment Type drawings prepared by Reddy Architecture + Urbanism Architects, which accompany the planning application.

3.3.6 Proposed Ancillary Residential Amenities

3.3.6.1 Public Open Space

Public open space is as permitted under ABP-306569-20, with minor amendments to tie in with the new ‘Block A’ layout. As permitted under ABP-306569-20, public amenity open space is a significant feature which includes the ‘river walk’ and public plaza, connecting Parkgate Street to the River Liffey. The proposed amendments result in a small overall reduction of c. 7.1 sq m to the originally permitted c. 1,409 sq m of public open space within the site area.

Proposed Block A completes the creation of the already consented south facing public open space to the east of Block B and along the river edge, for the benefit of prospective residents and the local community.

We refer the Board to the Landscape Design Report and drawings, prepared by Mitchell & Associates for further details.

3.3.6.2 Private Communal Residential Amenities

Proposed Block A will have access to the private amenity residential roof garden already consented on the roof of Block B2. Some landscape works are proposed to tie this in with the residents’ lounge at 9th floor of proposed Block A. Prospective residents of Block A will also have access to the other external and internal amenity areas in the wider consented scheme. There is a further residents’ roof garden proposed at 28th floor roof level and internal residential amenity areas at ground and

mezzanine floors of proposed Block A. These facilities will provide generous external and internal space for prospective residents to enjoy.

At ground floor level residents are provided with a generous reception and foyer area (c. 75 sq m) at the eastern entrance to the building. A large residents' lounge area (c.121 sq m) is located at mezzanine level. The lounge area also provides flexible co-working spaces for residents. An accessible WC and kitchenette are also provided. The mezzanine provides views out to Parkgate Street and over the river walk to the south and beyond.

The proposed internal amenity space (c. 49 sq m) at Level 09 connects the residential tower to the large, landscaped terrace on the roof of the permitted office building (Block B2). The landscaped terrace provides 300 sq m of Block A's communal open amenity space requirement. Minor revisions to landscaping of the permitted open space are proposed to facilitate access to the internal amenity space within Block A at this level.

At Level 28 of the proposed residential tower, behind the 'crown' façade sits a triangular 'box', inset from the colonnade, creating a 360° rooftop viewing platform. The outdoor amenity space amounts to c. 255 sq m. The proposed internal residents' lounge and 2no. dining rooms amount to a combined total of c. 128 sq. m. These bookable rooms provide opportunities for social events and a unique dining experience.

Full height glazing is provided around the rooftop terrace area to mitigate wind effects and enhance amenity comfort levels. The glazing obviates the need for additional railings or guarding, allowing residents dramatic views across the city.

The secondary inboard façade helps to disguise the lift overruns and any plant associated with the smoke extract behind a parapet. This ensures the long-range views of the tower pick up the crown on the skyline and not ancillary plant, building maintenance unit and lift over-run.

Further details of communal residential amenity facilities can be found by reference to the Schedule of Accommodation, Housing Quality Assessment and Architectural Design Statement, prepared by Reddy Architecture and Urbanism, enclosed with the application.

3.3.6.3 Private Communal Amenity Open Space

Individual private amenity space in the form of a 'winter garden' for 53no. apartment units located on the eastern side of proposed Block A, amounting to a total of c.318 sq m.

While not all of the proposed units have a winter garden or private balcony, all of the proposed units in Block A will have convenient access to the shared private internal and external amenities within Block A (as described above) and within the wider consented scheme. This flexibility is allowed for 'Built to Rent' residential schemes, under the 'Sustainable Urban Housing: Apartment Design Guidelines' (2020).

3.3.7 Non-Residential Uses

The café/restaurant use (c. 223 sq.m incl. ancillary areas) will serve to activate the street level and amenity open spaces, in addition to the building entrance cores.

At the interface between Block A (tower) and the consented Office Block (B2), c.595.6 sq m of office floor area is recaptured between 1st to 8th floor levels of proposed Block A. It may be noted that c.909 sq m of office floor area has already been consented within this space. However, due to the amendment to the floor plans and how Block B2 interfaces with Block A, it is necessary to seek permission to amend this element of the consented scheme. The net reduction of office floor area across the consented and proposed scheme as a result is c. 313.4 sq m gross floor area. It should also be noted that the floor to floor height of the consented office building is different to that of the proposed Block A residential floors. Consequently, Block B2 will appear as a void at some of the Block A floor levels. While interlocking, internally they are separately contained buildings.

The following table identifies the extent of non-residential accommodation envisaged within the scheme.

Class of Development	Gross Floor Space (sq m) Proposed Block A	Gross Floor Space (sqm) Proposed and Consented
Office	c. 595.6	c.3384.6
Café/Restaurant	c. 223.00	c.459.00
Retail-Café	0	c.214.00
Cultural	0	c.119.00
Telecommunications hop site	c. 0.36	c. 0.36
Total	c.818.96	c.4143.96

Table 3.2: Breakdown of Non-Residential Uses

3.4 Amendments to the Consented Scheme

The proposed development (Block A) interfaces with the existing and consented (under ABP-306569-20) public realm at ground floor, where some reconfiguration is then necessary.

The proposed Block A also physically adjoins the permitted office building (Block B2). Some reconfiguration of the eastern end of permitted Block B2, at its interface with proposed Block A, is also therefore necessary. We refer to the 'Response' document prepared by Reddy Architects and Urbanism that illustrates the interface between consented Block B2 and the proposed new Block A.

The proposed amendments to the consented scheme to address the above, include:

- At the interface of proposed Block A with the consented Block B2 office building:
 - A reduction by c.909 sq m total of office floor area over 6 floors within the consented Block B2 office building. Of this, c.595.6 sq m office floor area is recaptured within the footprint of Block A, resulting in a net loss of c.313 sq m of office floor within the consented and proposed scheme.
 - A reduction by c.35 sq m of external residential amenity associated minor amendments to landscaping at roof level of consented Block B2. This area is recaptured within proposed Block A as part of the internal residential amenity (lounge) area that has access to the external residential amenity area on the roof of Block B2.
 - Localised changes to the northern Parkgate St façade of the consented Block B2 to include a shadow gap at its junction with proposed Block A. This allows for enhanced light penetration and view aspect for the proposed apartments in Block A. It also allows the architecture of the proposed tower to be read separately to that of Block B2.
- 16no. additional bicycle parking spaces are proposed to be accommodated within consented Block B1 undercroft area. This, in addition to the 22no. bicycle spaces within proposed Block A, addresses the uplift in apartment numbers (by 38no. units) compared to the previous scheme for which the overall bicycle parking system was designed.
- Minor localised amendments to adjoining consented public realm area to tie in with proposed Block A at ground level. Public realm and site works are otherwise consented under ABP-306569-20.
- New telecommunications infrastructure at roof level of consented Block B1, including: 4no. 300mm microwave link dishes mounted on 2no. 2m high steel poles fixed to the consented lift shaft overrun, housed within Glass Reinforced Plastic (GRP)¹ radio friendly shrouds, to mitigate

¹ Also known as fibreglass

potential for interference with existing telecommunication channels. This replaces the previous proposal, having regard to Condition 17 of ABP-306569-20.

In its submission to the Board, dated 20 January 2021, Dublin City Council noted it was generally satisfied that the proposed interface between the permitted 6-storey Block B2 office building and the proposed new Block A residential tower worked well in design terms.

3.5 Plot Ratio & Site Coverage

The overall application site area measures approximately 0.82 hectares.

The combined total gross floorspace, accounting for the consented (ABP-306569-20) and the proposed mixed use development is c. 42,185 sqm. This represents a plot ratio of c.5.14. Site coverage is approximately 42%.

3.5.1 Density

The Dublin City Development Plan 2016-2022 promotes the achievement of higher residential densities in the pursuit of compact city development. Other design considerations include ensuring high quality urban design and open space.

There is no prescriptive residential density threshold prescribed in the City Development Plan. For sites greater than 0.5 ha, proximate to a strategic public transport hub, within the city centre, national planning guidance on sustainable residential development would recommend that such sites dictate their own character. Density not less than 50 units per hectare is recommended, with no prescriptive upper limit beyond that.

198no. residential units in Block A are now proposed. This represents an uplift of 38no. dwellings compared to the previous proposal. Combined, the consented development (ABP-306569-20) and the proposed development deliver (321+198 =) 519no. residential units. This represents a residential density of 633no. units per hectare.

The proposed scheme complies with Policy QH8 of the City Plan, which seeks:

“To promote the sustainable development of vacant or under-utilised infill sites and to favourably consider higher density proposals which respect the design of the surrounding development and the character of the area.”

There is additional policy direction from the National Planning Framework, which promotes higher densities to create a compact urban form at central or accessible urban locations and encourage the use of sustainable forms of transport. Higher density development uses land more efficiently than lower density equivalents and is particularly promoted in central locations and/or locations with frequent and efficient public transport services, such as Parkgate Street. This is also supported by the relevant policy requirements of the ‘Design Standards for New Apartments Guidelines’ (2020) and ‘Urban Development and Building Height Guidelines’ (2018), which would identify this site location as being suitable for higher densities.

3.5.2 Part V – Social & Affordable Housing

There has been on-going dialogue between the applicant and Dublin City Council Housing Department with regard to Part V provision prior to making this SHD Planning Application.

It is proposed to provide 52no. units within the consented scheme for lease to the local authority, to meet the Applicant’s Part V obligations under Section 96 of the PDA 2000 (as amended). This include a mix of apartments sizes, as identified in the enclosed drawing pack (drawing no. PGATE-RAU-ZZ-ZZ-DR-A-GAO-31060) prepared by Reddy Architecture & Urbanism.

At this stage of the process the Part V details included in the enclosed Part V Proposal Letter are necessarily indicative and intended to provide a reasonable estimate of the costs and values of the units based on construction costs and values prevailing at the time of the application. The design

details of the proposed development are subject to possible amendment, through the decision or conditions applied by the Board, prior to formal Part V agreement between the Applicant and Dublin City Council. Any final formal Part V agreement will be determined by a final grant of permission, based on the number and type of units permitted, and upon the site value at the time the Permission is granted. This information is not available at this time.

The Part V proposal is thus made on a wholly without prejudice basis in order to comply with the Planning & Development Regulations in force at this time, required for the making of a valid planning application.

3.5.3 Building Height

The Dublin City Development Plan designates the Heuston gateway as a location with potential for tall buildings (over 50 metres high) to provide a new urban identity and as a western counter balance to regeneration in the Docklands to the east along the Liffey Quays. This principle was established in the consented scheme (ABP-306569-20), where the proposed height of Block A (29-storeys) was considered by both Dublin City Council and the Board to be acceptable in principle.

The Planning Authority and the Board were generally satisfied with the taller height and slenderness ratio proposed in the previous application (ABP-306567-20 refers). This current application seeks to address the design concerns raised by Dublin City Council and the Board relating to the proposed execution of architectural expression and materiality, while maintaining a similar height and slenderness profile for Block A.

The proposed height at 30 storeys accommodates residential units from 1st to 27th floors inclusive. A café/restaurant unit, resident's reception/foyer area, bin and bicycle storage and a small plant area is located at ground floor. Further internal residential amenity space is located at mezzanine level, Level 09 and Level 28, with quality external landscaped roof garden amenities also previously consented at Level 09 (roof of consented Block B2) and newly proposed at Level 28 (roof of proposed Block A).

The scale of the proposed building, located at the site's eastern apex is such that it is likely to be visible from a wide area within the city. The redesign of the Block A as now proposed has benefited from the input of a highly qualified, multi-disciplinary design team. This has included the further architectural expertise of Glenn Howells Architects, who bring a wealth of experience in the design of tall buildings appropriate to the character of Dublin city centre.

We refer the Board to the 'Response' document and to 'Architect's Design Statement', prepared by Reddy Architects and Urbanism, with input from Glen Howells Architects. We refer also to EIAR Chapter 13 'Landscape and Visual Impact Assessment' prepared by ARC Architectural Consultants and Grade I Conservation Architects that accompanies this application.

3.5.4 Drainage Infrastructure & Flood Risk

In the first instance, we refer the Board to the enclosed Engineering Assessment Report and Flood Risk Assessment, prepared by ARUP which provides a more detailed discussion regarding water and drainage infrastructure requirements. The drainage systems shall be designed in accordance with Part H of the Building Regulations, EN 752: Drain and Sewer Systems outside Buildings, The Greater Dublin Regional Code of Practice for Drainage Works, Irish Water's Code of Practice for Water and Wastewater and to DCC Drainage Division and Irish Water requirements.

Consultation with Irish Water has taken place. A Confirmation of Feasibility, enclosed herewith dated 14 October 2020, has been provided by Irish Water to show that the proposed connection to the Irish Water network can be facilitated. A Statement of Design Acceptance is also enclosed. As the water and wastewater infrastructure design for the proposed and consented development has not changed since the previously granted planning application ABP-306569-20, it has been confirmed by Irish Water that the Statement of Design Acceptance, dated 13 December 2019 remains valid.

We refer the Board to Chapter 14 -Water which confirms that water impacts are to be mitigated by management of surface water run-off during construction; mixing and batching activities away from watercourses; good construction management and controlled run-off.

Wastewater

There is no material change to infrastructure works arising from the redesign of the Block A building and uplift in residential unit numbers. These remain as per the consented development ABP-306569-20.

The proposed development will result in an additional effluent volume discharging to the public sewer. To address this, a section of the existing sewer network on Parkgate Street shall be upgraded as part of the consented scheme. This will create capacity for the wastewater discharge from the consented and proposed development in the combined sewer.

We refer the Board to the enclosed Drainage and Watermain Planning Report prepared by ARUP Consulting Engineers for further information.

Surface Water

Surface water run-off from the proposed Block A development shall drain by gravity and discharge to the consented surface water drainage system around Block A prior to out-falling to the River Liffey, in agreement with DCC Drainage Division. See Arup drawings PGATE-ARUP-ZZ-00-DR-CD-0002 and PGATE-ARUP-ZZ-00-DR-CD-0004 for further information.

Sustainable drainage systems will be incorporated into the proposed Block A development to ensure compliance with the consented scheme ABP-306569-20 and that surface run-off discharges through a minimum of two-stage treatment prior to discharge by gravity to the River Liffey.

These proposals, submitted to DCC Drainage Division, as part of the surface water management plan for the consented development ABP-306569-20, have been agreed in principal. There is no change in the surface water drainage strategy for the proposed Block A development

Water Supply

The water supply connection to the proposed Block A development will be from the consented water supply system (ABP-306569-20 refers) adjacent to Block A, with connection to the existing 150mm public main on Parkgate Street and cross-connection to the parallel 600mm public main, as directed by Irish Water.

The proposed watermain system will be designed to supply water to the apartments including the office space and retail areas with sluice valves and hydrants located in compliance with Part B of the Building Regulations and the local Fire Officers requirements.

The proposal is expected to result in some additional demands on the existing water supply network.

A Pre-connection Enquiry Application was submitted to Irish Water to confirm capacity in the public mains network. Based upon details submitted as part of the application, Irish Water have responded with a Confirmation of Feasibility Statement confirming that the proposed connection for the development, including the proposed Block A, can be facilitated subject to the requirements, as outlined in their correspondence Connection Ref No. CDS19000532. Irish Water has also confirmed that the Statement of Design Acceptance, dated 13 December 2019 remains valid for the proposed development.

We refer the Board to the accompanying watermain drawings PGATE-ARUP-ZZ-00-DR-CD-0002 and PGATE-ARUP-ZZ-00-DR-CD-0004 for layout of the watermain and connection to the public network, prepared by ARUP Consulting Engineers for further detail.

Flood Risk

It is noted that a Flood Risk Assessment was also previously prepared for the development permitted under ABP-306569-20. The proposed development subject of this SHD application does not involve any measures that affect or alter flood risk.

We refer the Board to the accompanying Flood Risk Assessment and Statement of Consistency with Flood Risk Management for Local Authorities (2009) prepared by ARUP Consulting Engineers.

This Flood Risk Assessment was carried out in accordance with the recommendations set out in the Dublin City Development Plan 2016 – 2022 and the OPW’s “The Planning System and Flood Risk Management, Guidelines for Planning Authorities” (2009).

The flood risk to the development has been identified as low. Finished floor levels have been raised to allow for climate change, and access and egress to the site will not be compromised during a flood event. The Flood Risk Assessment confirms that no significant impacts are predicted, subject to appropriate mitigation measures which the report identifies.

3.5.5 Landscape Proposal

The landscape proposals are largely consented under ABP-306569-20. Minor adjustments are proposed to tie the proposed Block A into the adjoining public realm at ground level and with the external terrace at the roof of consented Block B2.

We refer the Board to the Landscape Report and Drawings, prepared by Mitchell + Associates Landscape Architects for further design details of the consented scheme and proposed landscape amendments.

3.5.6 Transportation

3.5.6.1 Access

For the avoidance of doubt no change is proposed to the consented development in respect of site access.

3.5.6.2 Car Parking

No new car parking spaces are proposed as part of the proposed development. The consented scheme (ABP-306569-20) provides a total of 26no. car parking spaces with a further 15no. car spaces at ground level allocated to a bespoke car club for the purpose of non-commuting trips for the residents of the apartments.

A reduced quantum of residential car parking is appropriate due to the site’s excellent accessibility to city centre employment and amenities, and public transport.

3.5.6.3 Bicycle Parking

Additional secure bicycle parking and storage facilities are provided commensurate with the uplift in apartment numbers. (38no. new bike parking spaces, with 22no. located at ground level of Block A and 16no. located within permitted Block B undercroft area). This is in addition to the 551no. bicycle parking spaces within the consented scheme accessed via safe dedicated stairwell with dedicated storage for bicycles at ground level, basement and in the gateway entrance spaces.

Further details of the breakdown of bicycle parking provisions are set out in Chapter 6 ‘Transport’ of this EIAR and the Transportation Assessment, prepared by ARUP Consulting Engineers and Site Layout Plans, prepared by Reddy Architecture & Urbanism.

3.5.7 Waste Management

We refer the Board to the site-specific Construction and Demolition Waste Management Plan and Operational Waste Management Plan that has been prepared by AWN Consulting. These plans will be employed to ensure sustainable and effective waste management throughout the construction and demolition and the operational phases of the project. Both documents are included as appendices to Chapter 17 'Material Assets – Waste Management' of the EIAR.

3.5.8 Sustainability & Energy

We refer the Board to the enclosed Domestic Energy Analysis Report prepared by IN2 Consulting Engineers which provides a more detailed discussion regarding energy demand and energy usage. This report identifies the energy standards with which the proposed development will have to comply and also sets out the overall strategy that will be adopted to achieve these energy efficiency targets.

A Property Management Strategy Report has also been prepared by Aramark and is enclosed in this application. This report contains an assessment of long term running and maintenance costs of the development. On foot of this assessment, the Applicant proposes specific measures (contained in the report) to effectively manage and reduce costs for the benefit of residents.

3.5.9 Noise & Vibration

The earthworks will generate typical construction activity related noise and vibration sources from use of a variety of plant and machinery such as rock breakers (where required), excavators, lifting equipment, dumper trucks, compressors and generators.

We refer the Board to Chapter 9 'Noise and Vibration' of this EIAR as well as the Appendix 4.1 of this EIAR - Construction and Environmental Management Plan (CEMP), prepared by ARUP Consulting which provides more detail on Noise & Vibration.

3.5.10 Evolution of the site without the Proposed Project - 'Do-Nothing' Scenario

It is not practicable to complete the consented scheme (ABP-306569-20, Blocks B & C) without a further grant of permission for development that resolves the eastern elevation of Block B2, at the site of proposed Block A.

A 'do nothing' scenario in respect of proposed Block A would be an undesirable planning and environmental outcome at this pivotal, gateway site, in particular from an optimum site regeneration and a landscape and visual impact perspective.

3.5.11 Cumulative Development

The following projects are considered to be relevant in terms of cumulative development, and the EIAR has considered these projects in its assessment.

ABP Ref. 306569-20 (Extant Permission)

On 5 February 2020 Ruirside Developments Limited applied for permission for a Strategic Housing Development comprising mixed use residential and commercial redevelopment (c. 43,353 sq. m gross floor area) of a brownfield site, accommodated in 6no. blocks ranging in height from 8 to 29 storeys with basement and undercroft, and including: 481no. 'Build To Rent' apartments (66no. studio units, 298no. 1-bed units and 117no. 2-bed units); ancillary residents' amenity rooms and facilities, including co- working spaces, one of which (c.119 sq. m) to be made available to the public for hire for cultural uses/ events; commercial office (c.3,698 sq. m), retail (c.214 sq. m) and café/ restaurant (c.444 sq. m) uses; and all associated and ancillary conservation and site development works.



Figure 3.5: Extract from drawing PGATE-RAU-ZZ-00-DR-A-GAP-31100 - Ground Floor Plan, prepared by Reddy Architecture + Urbanism, showing ground floor area of consented and refused development under ABP-306569-20

In the split decision made by the Board (ABP Ref. 306569-20) on 28 May 2020, permission was granted at this site for 321no. Build-to-Rent residential apartments, ancillary residents’ amenity facilities, commercial office (c.3,698 sq. m), retail (c.214 sq. m) and café/restaurant (c.236 sq. m), accommodated in 5no. blocks ranging from 8 to 13 storeys (c. 31,146 sq. m) over ancillary basement area, and all associated and ancillary conservation, landscaping and site development works.

Permission was refused for Block A, a 29-storey residential tower (c.12,207 sq m gfa), accommodating 160no. ‘BTR’ residential apartments, ancillary residents’ internal amenity areas and external roof gardens, 1no. café/restaurant (c.208 sq m) and ancillary plant / storage.

Both Dublin City Council (DCC) and An Bord Pleanála (the Board) were largely supportive of the general proposal and, in particular, the principle of the tower element in terms of height and scale. However it was determined that the architectural quality and expression of the proposed tower was not of sufficient quality to be an enduring, landmark building.

An opportunity was however identified by the Board’s Inspector that a new, revised design could be the subject of a separate planning application. It is submitted that the Applicant and the Design Team have now addressed the concerns raised by both the Board and DCC in bringing forward a fresh concept. Furthermore, it is considered that these proposals can deliver a suitably designed landmark building at this location.

This SHD application seeks permission for a new Block A tower design, that addresses the concerns expressed by the planning authority and the Board in the case of ABP-306569-20. The revised design proposal seeks to achieve a building of exceptional architectural quality and an enduring landmark at the western gateway to Dublin city centre.

On the basis that the Block A building will rely on the permitted site works and shared amenities contained within the wider consented scheme, the red line planning application boundary is drawn around the wider planning unit, containing the consented scheme and the proposed development. The extent of the proposed Block A works are delineated by a broken green line within the overall red line.

For the avoidance of doubt, however, permission is not being re-sought for the consented development ABP-306569-20. This includes the consented site development and infrastructure works that also serve Block A. Demolition, conservation and works to protected and non-protected structures are also already permitted under ABP-306569-20, and permission is not being re-sought for these works.

The proposed development, for which permission is sought, therefore comprises only revised Block A and alterations to approved Block B at the interface between Blocks A and B. Some localized adjustments to the public realm area to accommodate the changed tower footprint are also proposed, and additional bicycle parking spaces to serve the increase in residential unit numbers.

The assessments undertaken as part of the EIAR have taken account of the consented SHD development (321no. units plus commercial uses). In addition, where appropriate to this assessment the cumulative impact of the consented development above, together with other permitted developments in the immediate vicinity has also been considered.

We refer the Board otherwise to Appendix 21.1 *'Proposed and Permitted Developments in the Local Area'*, which provides a comprehensive schedule of planning references potentially relevant to the assessment of cumulative effects of the proposed development for each of the environmental topics addressed in this EIAR.

3.6 Project Life Cycle

The purpose of this section is to provide a description of the proposed development and consider all relevant aspects of the project life cycle both during construction and post construction. These include the following: -

- Construction Stage (Land Use Requirements, Construction Activity & Significant Effects).
- Operation Stage (Processes, Activities, Materials Used).
- Secondary and Off-Site Developments.

3.6.1 Construction Programme

An 8 Year Planning Permission is being sought from An Bord Pleanála. A determination on the application is expected from An Bord Pleanála in late Q3 2021.

Allowing a reasonable period for mobilisation and site set up, it is expected that works will commence on Phase 2 (Block A) in Q1 2022. This is subject to permission and the discharge of any pre-commencement planning conditions_.

It is envisaged that construction of the overall proposed development will take approximately 34 months inclusive of the Block A development. Due to Covid-19 restrictions the programme has been and may continue to be affected. As a result the below proposed programme that may be subject to change in the event of prolonged Covid-19 restrictions on construction.

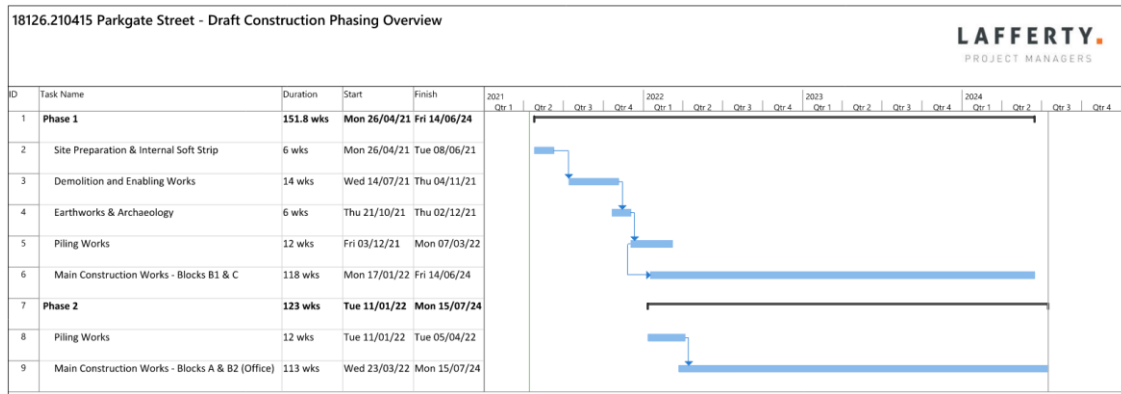


Figure 3.6: Proposed Construction Programme

The Main Contractor(s)², once appointed, will ultimately be responsible for the sequencing and implementation of the works in a safe and secure manner, and in accordance with all statutory requirements and the mitigation measures described in the EIAR. However, the approach outlined in Chapter 4 ‘Construction Strategy’ of this EIAR is considered to represent a worst-case scenario as to how the proposed development may be constructed in its entirety. Some flexibility is required in the sequencing of construction, as set out in this Chapter, in case on-site problems be encountered.

3.6.1.1 Construction Environmental Management Plan

A Construction and Environmental Management Plan has been prepared by ARUP Consulting Engineers and is enclosed as Appendix 4.1 of this EIAR.

This report ensures that best construction management practices are applied to the site by the main contractor and that measures are in place during demolition and construction to reduce as much as possible the impact of the works on people, property and the environment. The Plan incorporates all the mitigation contained within this EIAR.

3.6.1.2 Construction Stage

It is anticipated that the construction works for the development of the former Hickey’s site will be divided into two separate phases. Phase 1 includes demolition and enabling works for the site, and construction of Blocks B1 and C. Phase 2 includes construction of Block B2 and subject to future planning consent, construction of Block A.

¹ Note: It is envisaged that the contract for the construction works will be divided into separate contracts for each of the phases detailed below. Therefore, any reference to the ‘Main Contractor’ in this document refers to the Main Contractor for each of the individual phases

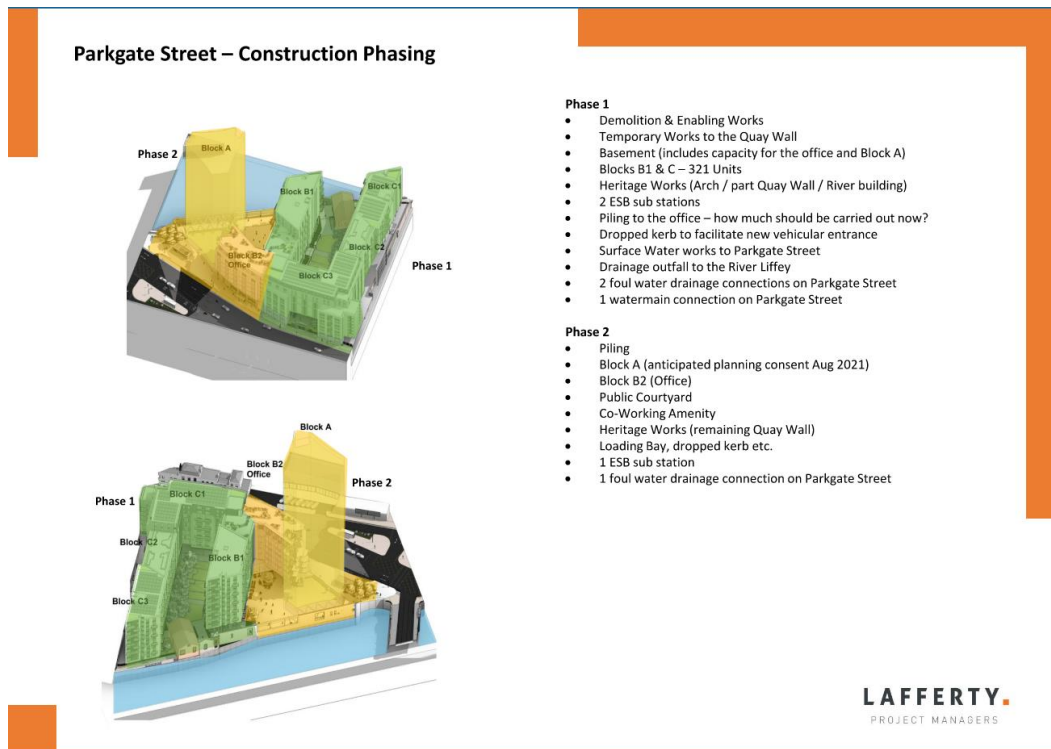


Figure 3.7: Proposed Construction Phasing

The Contractor will be required to prepare a detailed Construction Management Plan, including traffic management, on foot of these phasing proposals.

3.6.1.3 Construction Activities

There are a number of construction activities involved in a project such as this. The activities (independent of phasing) can be divided into five general categories:-

- **Excavation:** This includes site clearing and earthworks – soil / rock removal – required to prepare the site for the foundations and floorspace above.
- **Structure:** Structure includes the foundations and the physical frame of the residential units and café/restaurant.
- **Enclosures:** The enclosures for the buildings will be formed from concrete frame, brick, block work, timber, and glass, with slate roofs and flat roofs, all with the required levels of insulation and water proof membranes.
- **Services:** The requisite services will be provided including drainage and lightning.
- **Landscaping:** The landscaping works include some hard landscaping, roads, footpaths, bed and tree planting, and significant open spaces. In addition, there are a number of existing trees to be protected on site and incorporated into the new scheme.

We refer the Board to Section 4.3.2.1 to 4.3.2.3 of Chapter 4 ‘Construction Strategy’ of this EIAR for further details on enabling works site set up, demolition and site preparation, piling and groundworks and main construction works

Welfare facilities (canteens, toilets etc) will be available within the construction compound and this will remain in place for the construction period of the proposed development. The construction compound will be engineered with appropriate services and will be hoarded or fenced off for security

purposes As construction progresses, it will be necessary to move the location of the construction compound within the site.

3.6.1.4 Construction Access

The main construction works phase of the project will require closure of the existing vehicular entrance and construction of a new site entrance between consented Blocks A and B2 for access and egress construction movements. This will require relocation of Dublin Bikes Station No. 92 (new location to be agreed with Dublin City Council).

Approved traffic management plans will be submitted with the updated Construction and Environmental Management Plan, prior to the commencement of works.

3.6.1.5 Construction Transportation Impact

It is not anticipated that there will be any significant effect relating to transportation (traffic and parking) arising from the proposed development during construction stage.

Construction traffic would consist of private construction staff vehicles and HGVs involved in site development works and materials delivery. No car parking is envisaged to be provided within the site. Staff and visitors to the site will be encouraged to utilise non-vehicular means. Otherwise, there is on-street Pay & Display public parking in the environs of the site. The Contractor will be required as part of the contract to introduce a Mobility Management Plan for its workforce to encourage access to the site by means other than private car.

The transportation assessment concludes that the site is highly accessible by sustainable travel modes, therefore, it is anticipated that a proportion of construction staff will be able to reach the site by means other than private car, reducing the potential vehicle impact during morning and evening peak periods. Construction HGVs traffic generated during the development works would tend to be distributed throughout the day.

The impact of traffic generated during construction stage will be temporary in nature.

Further details of the access routes are outlined in the Construction Environmental Management Plan (CEMP) included as Appendix 4.1 of this EIAR. The construction traffic routing is covered in detail in Chapter 6, 'Transport'.

3.6.1.6 Air Quality – Dust & Dirt

The appointed Contractor shall put in place a regime for monitoring dust levels in the vicinity of the Site during the Construction Phase. The level of monitoring and adoptions of mitigation measures will vary throughout the Construction Phase depending on the type of activities being undertaken and the prevailing weather conditions at the time

The potential impacts associated with air quality during the Construction Phase are addressed in EIAR Chapter 7: Air Quality.

3.6.1.7 Noise & Vibration

It is not envisaged that any significant prolonged noise and vibration producing activities will be carried out onsite.

The potential impacts associated with noise and vibration during the Construction Phase, are addressed in Chapter 9: Noise & Vibration.

3.6.1.8 Waste

A Construction & Environmental Management Plan and Outline Construction and Demolition Waste Management Plan have been prepared and are included with the SHD Planning Application. In addition, Chapter 17: Material Assets -Waste Management of this EIA includes details regarding the anticipated amounts of waste generated from the project, the subsequent potential impacts and the mitigation measure proposed to ameliorate any anticipated negative impacts.

In summary, all waste generated during the construction and operational periods is proposed to be appropriately disposed of in accordance with the submitted Waste Management Plans.

3.6.1.9 Health & Safety Issues

The development will comply with all Health & Safety Regulations during the construction of the project. Where possible potential risks will be designed out so that the impact on the construction phase will be reduced.

3.6.2 Operational Phase

The primary direct significant environmental effects will arise during the Construction Phase. As a result, the Operational Phase of the Proposed Project is therefore relatively benign and not likely to give rise to any significant additional impacts in terms of activities, materials or natural resources used or effects, residues or emissions which are likely to have a significant impact on human beings, flora and fauna, soils, water, air and climate.

The primary likely significant environmental impacts of the Operational Phase as a result of the proposed Development are fully addressed in the relevant specialist chapters of this EIA. These impacts relate to Population & Human Health, Landscape & Visual, Noise & Vibration and Air Quality associated with the traffic generated.

The Proposed Development also has the potential for cumulative, secondary and indirect impacts (e.g. traffic). These can be difficult to quantify due to complex inter-relationships.

However, all interactions and cumulative impacts are unlikely to be significant adverse, and have been addressed in Chapter 21 -Summary of Cumulative and Interactive Effects of this EIA.

3.7 Related Development and Cumulative Impacts

Each Chapter of the EIA includes a cumulative impact assessment of the Proposed Development with other planned projects in the immediate area. The potential cumulative impacts primarily relate to traffic, dust, noise and other nuisances from the construction of the development, with other planned or existing projects, and each of the following EIA chapters has regard to these in the assessment and mitigation measures proposed.

As such, with the necessary mitigation for each environmental aspect, it is anticipated that the potential cumulative impact of the proposed development in conjunction with the other planned developments will be minimal.