

Environmental Impact Assessment Report (EIAR)

Volume 3 Non-Technical Summary (NTS)

Strategic Housing Development at Hartfield Place, Swords Road, Whitehall, Dublin 9.

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Prepared by



In association with

- PUNCH Consulting Engineers
- Traynor Environmental
- Macroworks
- John Purcell Archaeological Consultancy
- JBA Consulting
- AECOM Engineering

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1 INTRODUCTION

This is the Non-Technical Summary (NTS) of the Environmental Impact Assessment Report (EIAR) prepared in relation to a Strategic Housing development application to An Bord Pleanála for a new residential development on a gross site area of c.3.889ha on lands located at ‘Hartfield Place’, Swords Road, Whitehall, Dublin 9.

Each EIAR Chapter outlines the receiving environment; the potential impacts of the proposed development; the mitigation measures deemed necessary; and the predicted impacts once the mitigation measures are implemented. The purpose of the NTS is to summarise and explain in non-technical language, the likely and significant effects to the environments arising from this project. Section 2 of this EIAR NTS provides a brief site context and section 3 outlines the proposed development description. Section 4 outlines the data required for each EIAR chapter and section 5 outlines the predicted impacts relating to each chapter.

This NTS is prepared with direct input from the design team who include McGill Planning, C+W O’ Brien Architects, Parkhood Landscape Architecture, AECOM, Macroworks, JBA Consulting, Traynor Environmental, John Purcell Archaeological Consultancy and Punch Consulting Engineers to ensure that the possible effect on the environment has been examined through the process of an EIAR (detailed below) and the most appropriate form of development is delivered at this site.

The EIAR has been prepared in accordance with the provisions of the Planning and Development Act (as amended) and the Planning & Development Regulations 2001(as amended), which give effect in national planning legislation to the EU Directives on EIA.

EIA requirements originate from Council Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment, as amended by Directive 97/11/EC, 2003/35/EC and 2009/31/EC. The Directive and its amendments were subsequently codified and replaced by Directive 2011/92/EU, as amended in turn by Directive 2014/52/EU. This amending Directive was transposed into national planning consent procedures in September 2018 through the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018).

The objective of the EIA Directive is to ensure a high level of protection of the environment and human health, through the establishment of minimum requirements for environmental impact assessment prior to development consent being given, of public and private developments that are likely to have significant effects on the environment.

An EIA is mandatory for certain projects and for other projects that meet or exceed a stated threshold as set out in Annex I and Annex II of the Directive (and Part 1 and Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended). Projects that do not meet or exceed a stated threshold are subject to Screening for the requirement, or not, for ‘sub-threshold’ EIA.

The gross area of the application site is c. 3.889ha, which is below the 10ha threshold for a built-up area. The proposed development for 472 no. units, which is below the 500 no. units threshold. However, it was deemed prudent to prepare an EIAR due to the *cumulation with other existing development and/or development the subject of a consent for proposed development* within the immediate area.

Furthermore, it is noted that under Article 299A of the Regulations, where a planning application for a sub-threshold development is accompanied by an EIAR and a request for a determination under

section 7(1)(a)(i)(l) of the Act of 2016 was not made, the application shall be dealt with as if the EIAR had been submitted in accordance with section 172(1) of the Act.

2 SITE CONTEXT

The subject site is located within Dublin City Council administrative area. The development site is located along the Swords Road (R132), Dublin 9. The western side of the site fronts onto the Swords Road and the site is accessed from this location. Highfield Hospital is to the immediate south, also fronting onto the Swords Road.

There are vacant lands owned by Dublin City Council and Whitehall GAA pitches to the north of the site, facing onto the Swords Road and Collins Avenue. Beech Lawn Nursing home is located to the rear (east) of the site, accessed from Grace Park Road via High Park.

On the western boundary of the site is the Swords Road, a wide north-south artery into Dublin City which features Quality Bus corridors and part-segregated cycle lanes. Directly across the Swords Road from the subject site is a strip of neighbourhood level mixed-use activities. Similarly, to the north of the site on Collins Avenue, a 5-minute walk, is another neighbourhood level centre for the Whitehall area.

The subject site is located a 15-minute walk from the main campus of Dublin City University, a major centre of higher education and employment in the area. The nearest large-scale retail and services is 20 minutes walking distance to the north west in Santry. The Omni Park Shopping Centre and the neighbouring industrial estate are large scale employers in the area.

There was formerly a gatehouse to the south west of the site which was associated with the Manor house that once tied the surrounding lands together but both have since been demolished.



Figure 1 Site Location. Note the red line shown is for indicative purposes only. Please refer to the architects' drawings for an accurate red line boundary.

3 PROJECT DESCRIPTION

Eastwise Construction Swords Ltd intend to apply to An Bord Pleanála for permission for a strategic housing development at 'Hartfield Place', Swords Road, Whitehall, Dublin 9. The site is bound to the west by Swords Road, to the south by Highfield Hospital, to the north by vacant land and GAA pitches, and to the east by Beechlawm Nursing Home. To facilitate water services and road infrastructure connections/upgrades the application site red line extends to include a portion of Swords Road (including junctions with Iveragh Road and Collins Avenue), High Park and Grace Park Road (including junctions with Grace Park Heights and Sion Hill Road).

The proposed development will consist of the construction of:

- 7 no. apartment blocks, ranging in height up to 8 storeys (over single level basement).
- This will provide 472 no. residential units (comprising 32 no. studios, 198 no. 1 beds, 233 no. 2 beds, and 9 no. 3 beds).
- All with associated private balconies/terraces to the north/south/east/west elevations.
- A creche (c.445.76sqm), a café unit (c.99sqm), and internal residential amenity space (c.511sqm), providing a sun lounge, gym, screening room, lounge, and meeting rooms, will also be provided.
- The proposed development will include 337 no. car parking spaces, 982 no. cycle parking spaces, and 14 no. motorcycle spaces at basement/surface levels, public open space, and communal open spaces at ground and roof levels.

Vehicular access from Swords Road will be provided with associated works/upgrades to the existing public road layout, junctions, bus lane and footpath network to facilitate same. Two pedestrian/cyclist only access are provided from the Swords Road as well as a separate pedestrian and cyclist access to the southwest which also facilitates emergency vehicular access.

The application will include for all development works, landscaping, ESB substations, plant areas, bin storage, surface water attenuation, and site services required to facilitate the proposed development. Upgrades to the Irish Water network to facilitate the development are also proposed.

4 DATA REQUIRED TO IDENTIFY AND ASSESS THE MAIN EFFECTS WHICH THE PROPOSED DEVELOPMENT IS LIKELY TO HAVE ON THE ENVIRONMENT

Data is required to identify and assess the main impacts which the proposed development is likely to have on the environment. The following is a synopsis of the data and information available and sourced for this Environmental Impact Assessment. This is in line with the following regulations and guidelines which were considered:

- The EU Directives and Irish regulations regarding Environmental Impact Assessment;
- Environmental Impact Assessment of Projects Guidance on the preparation of the Environmental Impact Assessment Report (European Commission, 2017)
- Guidelines on the Information to be Contained in the Environmental Impact Assessment Reports – Draft (Environmental Protection Agency, 2017)
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (Department of Housing, Planning and Local Government, 2018)

Population and Human Health

To establish the existing receiving environment/baseline for the subject site, the methodology included site visits to evaluate the location and likely significant potential impact upon the human sources in the area. Desk based study included an analysis of the Central Statistics Office Census (CSO) data, the ESRI Quarterly Economic Commentary, and national, regional and local planning policy, school and creche enrolment figures.

Different local catchment areas were established for analysing population data, creche demand and capacity, and school demand and capacity. These areas were chosen to gather the most relevant data for each factor. A general local catchment area of 1km from the subject site forms the basis of most areas of analysis.

Biodiversity

The assessment considers the works related to the construction phase of the development and the operational phase of the development. The assessment methodology of this chapter is outlined in the sections below.

Relevant Policies and Plans

The policy documents to which this assessment has had regard include the following:

- National Biodiversity Action Plan 2017-2021
- Ireland's National Strategy for Plant Conservation – progress towards 2020
- Dublin City Biodiversity Action Plan 2015-2020 and Draft Dublin City Biodiversity Action Plan 2021-2025
- Dublin City Development Plan 2016-2022

Guidance

This assessment was conducted in accordance with the following guidance documents:

- OPR Practice Note PN02 Environmental Impact Assessment Screening (OPR, June 2021)
- Guidelines for planning authorities and An Board Pleanála on carrying out environmental impact assessment (Department of Housing, Planning and Local Governments, August 2018)

- Guidelines for Ecological Impact Assessment in the United Kingdom and Ireland: Terrestrial, Freshwater, Coastal and Marine. Chartered Institute of Ecology and Environmental Management (CIEEM, 2018).
- Guidelines on the information to be contained in Environmental Impact Assessment Reports (Draft) Environmental Protection Agency (EPA, 2017).
- Guidelines for Assessment of Ecological Impacts of National Road Schemes (NRA, 2009a).
- Environmental Impact Assessment of National Road Schemes – A Practical Guide (NRA, 2008).
- Best Practice Guidance for Habitat Survey and Mapping. The Heritage Council. (Smith *et al.*, 2011).
- Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition) (Collins, 2016).
- Bat Mitigation Guidelines for Ireland (Kelleher and Marnell, 2006).
- Guidance Note 08/18. Bats and Artificial Lighting in the UK - Bats and the Built Environment series (ILP, 2018).
- Guidelines on The Management of Noxious Weeds and Non-native Invasive Plant Species on National Roads (NRA, 2010)

Designated Nature Conservation Sites

Sites of international importance including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) are collectively known as Natura 2000 sites. These sites contain examples of some of the most important natural and semi-natural ecosystems in Europe. Designated sites, which also include Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs), which are national designations, were also identified within the proposed development's area of influence. The Zone of Influence (Zoi) for designated sites is defined by the presence of pathways; surface water, groundwater and land & air pathways. For groundwater and land & air pathways a 15km distance from the development was used to identify Natura 2000 sites and a 10km distance was used to identify pNHAs/NHAs. The ultimate discharge location for foul water produced on site is at Ringsend Waste Water Treatment Plant's (WWTP) discharge location and a 15km search distance from this location as well as the proposed development location was used to identify all designated sites with potential surface water pathway.

Screening of Ecological Features

The ecological features identified during the walkover surveys and from desk-based assessments were reviewed.

An informal screening process is presented at the start of the results section to ensure that the assessment focuses only on features where the impact could have important consequences for biodiversity (valued ecological features). Any features which are important beyond the site level were identified for further evaluation. Ecological features with little or no value beyond the site level were screened out and a short statement explaining this is given in the screening section.

A separate Appropriate Assessment (AA) Screening Report has been produced (JBA, 2022), to assess the potential for effects on Designated Natura 2000 sites. The AA Screening Report concluded there will be no likely significant effects on any European Natura 2000 sites arising from the proposed development, either alone or in-combination with other plans or projects. Natura 2000 sites are therefore not considered further in this Chapter.

Assessment of the Effects on Features

Ecological features include nature conservation sites, habitats, species assemblages/ communities, populations or groups of species. The assessment of the significance of predicted impacts on ecological features is based on both the 'value' of a feature, and the nature and magnitude of the impact that the project will have on it. The impact is based on the project which includes a certain amount of designed-in mitigation, including construction best practice measures that will be implemented with a high degree of certainty.

Land, Soil and Geology

The assessment of the potential impact of the activity on water and hydrology was carried out according to the methodology specified in the following guidance documents:

- 1) Environmental Protection Agency (EPA) Guidelines on the Information to be Contained in Environmental Impact Statements (2017);

The principal attributes (and impacts) to be assessed include the following:

- 1) Geological heritage sites in the vicinity of the perimeter of the subject site;
- 2) Landfills, industrial sites in the vicinity of the site and the potential risk of encountering contaminated ground;
- 3) The quality, drainage characteristics and range of agricultural uses of soil around the subject site;
- 4) Quarries or mines in the vicinity, the potential implications (if any) for existing activities and extractable reserves;
- 5) The extent of topsoil and subsoil cover and the potential use of this material on site or requirement to remove it off-site as waste for disposal or recovery;
- 6) High yielding water supply springs/ wells in the vicinity of the subject site to within a 2 km radius and the potential for increased risk presented by the proposed development;
- 7) Classification (regionally important, locally important) and extent of aquifers underlying the study area perimeter and increased risks presented to them by construction and operation related activities associated with aspects such as for example removal of subsoil cover, removal of aquifer (in whole or part), drawdown in water levels, alteration in established flow regimes, change in groundwater quality;
- 8) Natural hydrogeological/ karst features in the area and potential for increased risk presented by the activities at the proposed development site; and
- 9) Groundwater-fed ecosystems and the increased risk presented by the construction and operational phases of the proposed development both spatially and temporally.

The following sources of information were consulted to establish the baseline environment:

- 1) The Geological Survey of Ireland (GSI) online well card and groundwater records for the area were inspected, with reference to hydrology and hydrogeology;
- 2) EPA water quality monitoring data in the area;
- 3) EPA Geoportal website;
- 4) Dublin Port Tunnel Design and Construct Contract Site Investigation Data Reports, Volume 5 Part 1 Site Investigation Data Reports, dated October 2000;
- 5) Report on Site Investigation at Swords Road Whitehall Dublin 9, Ground Investigations Ireland (Report No 2442-02-10), dated May 2010;
- 6) Swords Road Ground Investigation, Ground Investigations Ireland (Report No. 25-08-20 Rev A), dated August 2020;
- 7) Tunnel Impact Assessment - Hartfield Place Residential Development Swords Road, AGL Consulting, dated February 2022.

From the GSI /EPA website, the following information was obtained:

- 1) Soil Map;
- 2) Bedrock Geology Maps;
- 3) Quaternary (Subsoils) Maps;
- 4) Well Card Database (Groundwater Wells);
- 5) Historical Geological 6 inch:1-mile maps;
- 6) Database of Site Investigations/Surveys;
- 7) Waste sites, mine sites and industrial locations;
- 8) Geological heritage locations; and
- 9) Water features.

Hydrology and Water Services

The assessment of the potential impact of the activity on water and hydrology was carried out according to the methodology specified in the following guidance documents:

- 1) Environmental Protection Agency (EPA) Guidelines on the Information to be Contained in Environmental Impact Statements (2017);
- 2) EPA Advice Notes on Current Practice (in the Preparation of EIS) (2003)

The following sources of information were consulted to establish the baseline environment: -

- 1) The Planning System and Flood Risk Management – Guidelines for Planning Authorities - Department of the Environment, Heritage and Local Government (DoEHLG) and the Office of Public Works (OPW);
- 2) The Geological Survey of Ireland (GSI) well card and groundwater records for the area were inspected, with reference to hydrology;
- 3) Control of Water Pollution from Construction Sites, Guidance for Consultants and Contractors (CIRIA 532, 2001);
- 4) Base maps – Ordnance Survey of Ireland;
- 5) Flood Hazard Maps and flooding information for Ireland, www.floodmaps.ie - Office of Public Works (OPW);
- 6) CFRAM/ PFRA Maps (OPW);
- 7) Geological Survey of Ireland (GSI) maps on superficial deposits;
- 8) Dublin Port Tunnel Design and Construct Contract Site Investigation Data Reports, Volume 5 Part 1 Site Investigation Data Reports, dated October 2000;
- 9) Report on Site Investigation at Swords Road Whitehall Dublin 9, Ground Investigations Ireland (Report No 2442-02-10), dated May 2010;
- 10) Swords Road Ground Investigation, Ground Investigations Ireland (Report No. 25-08-20 Rev A), dated August 2020.

Noise and Vibration

This noise and vibration assessment has been prepared in accordance with the EPA 'Guidelines on the Information to be contained in Environmental Impact Statements, 2002', 'Advice Notes on Current Practice (in preparation of Environmental Impact Statements)', the 'Guidelines on the information to be contained in Environmental Impact Assessment Reports' (EPA DRAFT August 2017), National Road Authorities 'Guidelines for the Treatment of Noise and Vibration in National Road Schemes' 2004 and The Dublin City Development Plan 2016-2022.

Section 16.36 of Dublin City Development Plan 2016-2022 states that: *"Dublin City Council will have regard to the Dublin Agglomeration Noise Action Plan 2013-2018 when assessing planning applications"*. The Dublin Agglomeration Noise Action Plan 2013-2018 (DANAP) was produced by four Local Authorities to avoid, prevent and reduce the harmful effects of noise from road traffic, rail and aircraft. It will be used in this instance to determine the impact of noise from these sources in the vicinity of the application site. The document contains absolute noise thresholds for desirable low and undesirable high sound levels.

In the absence of a specific Irish standard for assessing the impact of transportation noise on residential developments, it is usual to rely upon UK guidance as international standards.

Climate and Air Quality

The general assessment methodology of the potential impact of the proposed development on air quality and climate has been devised in accordance with:

- 2017 EPA Guidelines on information to be contained in Environmental Impact Assessment Reports.
- 2017 EC Guidance "Guidance on the preparation of the Environmental Impact Assessment Reports"
- Guidelines on Information to be Contained in an Environmental Impact Statement (EPA 2002).
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (DoHPLG, August 2018).
- Advice Notes on Current Practice (in preparation of Environmental Impact Statements) (EPA 2003).
- Environmental Protection Agency, 2015. Revised Guidelines on the Information to be Contained in Environmental Impact Statements.
- Environmental Protection Agency, 2015. Draft Advice Notes for Preparation of Environmental Impact Statements.
- Environmental Impact Assessment (EIA), Guidance for Consent Authorities Regarding Sub-Threshold Development (DoEHLG 2003).
- Development Management Guidelines (DoEHLG, 2007).
- European Union (Planning & Development) (Environmental Impact Assessment Regulations 2018).
- Design Manual for Roads and Bridges (DMRB).

Landscape and Visual

Production of this Landscape/townscape and Visual Impact Assessment involved:

- A desktop study to establish an appropriate study area and relevant landscape and visual designations in the Dublin City County Development Plan 2016-2022;
- Fieldwork to study the receiving environment;
- Assessment of the significance of the landscape impact of the proposed development as a function of landscape sensitivity weighed against the magnitude of the landscape impact;

- Assessment of the significance of the visual impact of the proposed development as a function of visual receptor sensitivity weighed against the magnitude of the visual impact.

This document uses methodology as prescribed in the Institute of Environmental Management and Assessment (IEMA) and landscape Institute (UK) 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA-2013).

Although this is principally a 'townscape' assessment, it utilises the same outline methodology as would be employed for the more familiar Landscape and Visual Impact Assessment (LVIA) of developments in rural settings. The justification for this approach is provided below.

It is important to note that the Guidelines for Landscape and Visual Impact Assessment' (GLVIA-2013) follow the European Landscape Convention (ELC) definition of landscape: *'Landscape is an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors' (Council of Europe, 2000)*. Thus, GLVIA-2013 covers all landscapes from *"high mountains and wild countryside to urban and fringe farmland (rural landscapes), marine and coastal landscapes (seascapes) and the landscapes of villages towns and cities (townscapes)"* - whether protected or degraded.

In the case of this project, the study area is overwhelmingly that of an urban setting or 'townscape' and this is defined in GLVIA-2013 in the following manner (Section 2.7):

"'Townscape' refers to areas where the built environment is dominant. Villages, towns and cities often make important contributions as elements in wider-open landscapes but townscape means the landscape within the built-up area, including the buildings, the relationships between them, the different types of urban spaces, including green spaces, and the relationship between buildings and open spaces. There are important relationships with historic dimensions of landscape and townscape, since evidence of the way the villages, towns and cities change and develop over time contributes to their current form and character."

Landscape/townscape Assessment Criteria

When assessing the potential impacts on the townscape resulting from a proposed development, the following criteria are considered:

- Landscape/townscape character, value and sensitivity;
- Magnitude of likely impacts;
- Significance of landscape effects.

The sensitivity of the townscape to change is the degree to which a particular setting can accommodate changes or new elements without unacceptable detrimental effects to its essential characteristics.

The magnitude of a predicted landscape/townscape impact is a product of the scale, extent or degree of change that is likely to be experienced as a result of the proposed Development. The magnitude takes into account whether there is a direct physical impact resulting from the loss of landscape/townscape components and/or a change that extends beyond the immediate setting that may have an effect on the townscape character.

The significance of a landscape/townscape impact is based on a balance between the sensitivity of the landscape receptor and the magnitude of the impact.

Visual Impact Assessment Criteria

As with the landscape/townscape impact, the visual impact of the proposed Development will be assessed as a function of sensitivity versus magnitude. In this instance the sensitivity of the visual receptor, weighed against the magnitude of the visual effect.

Sensitivity of Visual Receptors

Unlike landscape sensitivity, the sensitivity of visual receptors has an anthropocentric (human) basis. It considers factors such as the perceived quality and values associated with the view, the landscape/townscape context of the viewer, the likely activity they are engaged in and whether this heightens their awareness of the surrounding landscape. A list of the factors considered by the assessor in estimating the level of sensitivity for a particular visual receptor is outlined below to establish visual receptor sensitivity at each VRP:

Susceptibility of Receptors

In accordance with the Institute of Environmental Management and Assessment (“IEMA”) Guidelines for Landscape and Visual Assessment (3rd edition 2013) visual receptors most susceptible to changes in views and visual amenity are:

- *“Residents at home;*
- *People, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focussed on the landscape and on particular views;*
- *Visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience;*
- *Communities where views contribute to the landscape setting enjoyed by residents in the area;*
- *Travellers on road rail or other transport routes where such travel involves recognised scenic routes and awareness of views is likely to be heightened”.*

Visual receptors that are less susceptible to changes in views and visual amenity include;

- *“People engaged in outdoor sport or recreation, which does not involve or depend upon appreciation of views of the landscape;*
- *People at their place of work whose attention may be focussed on their work or activity, not their surroundings and where the setting is not important to the quality of working life”.*

Traffic and Transportation

The methodology adopted for this chapter can be summarised as follows:

- Trip Generation – The client and project team provided information relating to the anticipated volume of traffic associated with the proposed development and intended SHD during construction (where construction phases may overlap). The TRICS version 7.7.2 database was used to determine vehicle trips associated with the operation of the SHD.
- Existing Transport Infrastructure – AECOM has collated information on the existing and proposed transport network in vicinity of the application site using online publicly available sources and the outcomes of a site visit.
- Existing Traffic Flow Assessment – The traffic surveys (weekday classified junction turning counts) were conducted by an independent survey company, IDASO over a 12-hr survey period from 07:00 – 19:00 on Thursday the 3rd of October 2019.
- Percentage Impact Assessment – The proposed development’s traffic impact on the local road network is assessed as a percentage change with and without development to determine any requirements for further analysis.
- Junction Impact Analysis – Road links shown to exceed the percentage impact threshold are subject to standalone junction modelling.

- Implications of the intended SHD – The operational impact of the SHD upon the proposed development is calculated, expressed as a measure of the capacity of the proposed development to accommodate future traffic flows as per TII Traffic and Transport Assessment Guidelines. Where there is a potential overlap in the construction programme for the proposed development and SHD this is also considered as a measure of the capacity of the proposed development to accommodate such traffic.

The following guidance, in addition to EIAR guidance described in Chapter 1, has been used to inform this chapter:

- Project Ireland 2040: National Planning Framework (Department of Housing, Planning and Local Government and Department of Public Expenditure and Reform, January 2019);
- National Development Plan 2018 – 2027 (Department of Public Expenditure and Reform, February 2018);
- Dublin City Development Plan (2016 – 2022);
- Greater Dublin Area (GDA) Cycle Network Plan (National Transport Authority, December 2013);
- National Cycle Manual (National Transport Authority, 2011);
- Design Manual for Urban Roads and Streets, DMURS (Department of Transport, Tourism and Sport, May 2019);
- DN-GEO-03060: Geometric Design of Junctions (priority junctions, direct accesses, roundabouts, grade separated and compact grade separated junctions), (Transport Infrastructure Ireland (TII), June 2017);
- PE-PDV-02045: Traffic and Transport Assessment Guidelines (TII, May 2014); and
- Guidelines for Providing Journeys on Foot (The Institution of Highways & Transportation, 2000).

Material Assets

A desktop study was conducted in relation to the material assets associated with the proposed development and their capacities. Projections of the resources were made for the construction and operational phase of the development. The Guidelines on information to be contained in an Environment Impact Statement (EPA 2002), the advice notes on current practice and Draft EPA guidelines published in 2017 requires assessment of ‘economic assets of human origin’ to be included in the impact study as a desktop study of material assets associated with the development.

The impacts are assessed in terms of their scale, duration and significance to the site context. Construction phase impacts are assessed on the impact of the proposal likelihood in incurring loss or disturbance to material assets due to construction activities. Economic assets of natural origin that includes biodiversity, soil and water are addressed specifically in chapters 5, 6 and 7.

Waste Management

The assessment of the impacts of the proposed development arising from the consumption of resources and the generation of waste materials, was carried out taking into account the methodology specified in relevant guidance documents, along with an extensive document review to assist in identifying current and future requirements for waste management including national and regional waste policy, waste strategies, management plans, legislative requirements and relevant reports.

The primary legislative instruments that govern waste management in Ireland and applicable to the project are:

- Waste Management Act 1996 (No. 10 of 1996) as amended. Sub-ordinate Secondary legislation includes:
 - European Communities (Waste Directive) Regulations 2011 (SI 126 of 2011) as amended
 - Waste Management (Collection Permit) Regulations (S.I No. 820 of 2007) as amended
 - Waste Management (Facility Permit and Registration) Regulations 2007, (S.I No. 821 of 2007) as amended
 - Waste Management (Licensing) Regulations 2004 (S.I. No. 395 of 2004) as amended
 - Waste Management (Packaging) Regulations 2014 (S.I. 282 of 2014) as amended
 - Waste Management (Planning) Regulations 1997 (S.I. No. 137 of 1997) as amended
 - Waste Management (Landfill Levy) Regulations 2015 (S.I. No. 189 of 2015) as amended
 - European Union (Waste Electrical and Electronic Equipment) Regulations 2014 (S.I. No. 149 of 2014) as amended
 - European Union (Batteries and Accumulators) Regulations 2014 (S.I. No. 283 of 2014) as amended
 - Waste Management (Food Waste) Regulations 2009 (S.I. 508 of 2009), as amended
 - European Union (Household Food Waste and Bio-waste) Regulation 2015 (S.I. No. 191 430 of 2015)
 - Waste Management (Hazardous Waste) Regulations, 1998 (S.I. No. 163 of 1998) as amended
 - Waste Management (Shipments of Waste) Regulations, 2007 (S.I. No. 419 of 2007) as amended
 - European Communities (Shipments of Hazardous Waste exclusively within Ireland) Regulations 2011 (S.I. No. 324/2011) Waste Management (Movement of Hazardous Waste) Regulations, 1998 (S.I. No. 147 of 1998)
 - European Communities (Transfrontier Shipment of Waste) Regulations 1994 (SI 121 of 1994)
 - European Union (Properties of Waste which Render it Hazardous) Regulations 2015 (S.I. No. 233 of 2015)
- Environmental Protection Agency Act 1992 (No. 7 of 1992), as amended.
- Litter Pollution Act 1997 (No. 12 of 1997) as amended.
- Planning and Development Act 2000 (No. 30 of 2000), as amended.

A desk study was carried out which included the following:

- Review of applicable policy and legislation which creates the legal framework for resource and waste management in Ireland;
- Description of the typical waste materials that will be generated during the demolition, construction and operational phases; and
- Identification of mitigation measures to prevent waste generation and promote management of waste in accordance with the waste hierarchy.

Estimates of waste generation during the demolition, construction and operational phases of the proposed development have been calculated. The waste types and estimated quantities are based on published data by the EPA in National Waste Reports , data recorded from similar previous developments, Irish and US EPA waste generation research, other available research sources and waste collection data from the current facilities on site.

Mitigation measures are proposed to minimise the effect of the proposed development on the environment during the construction and operational phases, to promote efficient waste segregation and to reduce the quantity of waste requiring disposal.

Cultural Heritage

This chapter has been prepared having regard to the following guidelines;

- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (Department of Housing, Planning & Local Government, 2018)
- Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report (European Commission, 2017)
- Guidelines on the Information to be Contained in Environmental Impact Assessment Reports – Draft (EPA, 2017)
- National Monuments Acts, 1930-2014
- The Planning and Development (Strategic Infrastructure) Bill, 2006
- Heritage Act 1995
- Frameworks and Principles for the protection of Archaeological Heritage 1999
- Architectural Heritage (National Inventory) and Historic Monuments and the Local Government (Planning and Development) Act 2000

Study Methodology

This assessment consists of a paper survey identifying all recorded sites within the vicinity of the proposed development and a site inspection. The methodology has been conducted based on the guidelines from the Department of Culture, Heritage and the Gaeltacht (DAHG).

The desktop survey undertaken consisted of a document and cartographic search utilising a number of sources including the following:

- Record of Monuments and Places (RMP); The RMP records known upstanding archaeological monuments, the original location of destroyed monuments and the location of possible sites identified through, documentary, cartographic, photographic research and field inspections.
- The RMP consists of a list, organised by county and subdivided by 6" map sheets showing the location of each site. The RMP data is compiled from the files of the Archaeological Survey.
- National Inventory of Architectural Heritage; The inventory of architectural heritage lists all post 1700 structures and buildings in the country. This includes structures of architectural, historical, archaeological, artistic, cultural, social, scientific or technical importance.
- County Development Plans; The Development plan was consulted to ascertain if any structures listed in the Record of Protected Structures (RPS) and/or any Architectural Conservation Areas (ACAs). The Record of Protected Structures lists all protected structures and buildings in Dublin. This includes structures of architectural, historical, archaeological, artistic, cultural, social, scientific or technical importance.
- Cartographic Sources; The following maps were examined: Down Survey, 1st edition Ordnance Survey Maps (1836-1846) and 2nd edition Ordnance Survey Maps (1908), Rocque Map and the Cassini Map.
- Literary Sources; Various published sources, including local and national journals, were consulted to establish a historical background for the proposed development site. Literary sources are a valuable means of completing the written record of an area and gaining insight into the history of the environs of the proposed development. Principal archaeological sources include: The Excavations Bulletin; Local Journals; Published archaeological and architectural inventories; Peter Harbison, (1975). Guide to the National Monuments of Ireland; and O'Donovan's Ordnance Survey Letters.
- Previous archaeological assessments and excavations for the area were reviewed.

A comprehensive list of all literary sources consulted is given in the bibliography.

Site Inspection

An archaeological field inspection survey seeks to verify the location and extent of known archaeological features and to record the location and extent of any newly identified features. A field inspection should also identify any areas of archaeological potential with no above ground visibility. Many monument types do not leave surface markers. Wooden sites such as prehistoric house or burials may only be recorded through excavation works.

Site visits were undertaken in May 2019 and June 2020.

Assessment Criteria

The criteria used to assess the significance of the impact of a development on an archaeological landscape, site, feature, monument or complex are defined as follows:

- **Profound**, Applies where mitigation would be unlikely to remove adverse effects. Reserved for adverse, negative effects only. These effects arise where an archaeological site is completely and irreversibly destroyed by a proposed development.
- **Significant**, an impact which, by its magnitude, duration or intensity, alters an important aspect of the environment. An impact like this would be where part of a site would be permanently impacted upon, leading to a loss of character, integrity and data about the archaeological feature/site.
- **Moderate**, A moderate direct impact arises where a change to the site is proposed which though noticeable, is not such that the archaeological integrity of the site is compromised, and which is reversible. This arises where an archaeological feature can be incorporated into a modern-day development without damage and that all procedures used to facilitate this are reversible.
- **Slight**, An impact which causes changes in the character of the environment which are not significant or profound and do not directly impact or affect an archaeological feature or monument.
- **Imperceptible**, An impact capable of measurement but without noticeable consequences.

5 PREDICTED IMPACTS OF THE PROPOSED DEVELOPMENT

Population and Human Health

Construction Phase

Any adverse likely and significant environmental impacts will be avoided by the implementation of the remedial and mitigation measures proposed throughout this EIAR. Positive impacts are likely to arise due to an increase in employment and economic activity associated with the construction of the proposed development. The overall predicted likely and significant impact of the construction phase will be short-term, temporary and neutral.

Chapter 8 Noise and Vibration notes that with the incorporation of mitigation measures outline within chapter 8, construction noise are likely to be a Temporary Moderate Adverse effect, which is not considered to be significant. Construction vibration at nearby sensitive receptors are well below the limits and not significant. The construction traffic noise impacts are very low and also not significant.

The application of binding noise limits, hours of operation, along with implementation of the mitigation measures identified herein, will ensure that noise and vibration impact will have a negative, moderate, and short-term impact on the surrounding environment.

Chapter 9 Climate and Air Quality notes that the impact on the air quality and climate will be imperceptible once mitigation measures are implemented.

Chapter 11 Traffic and Transportation notes that the predicted impacts will generate a low level impact on the road network in comparison to the baseline traffic and with the preparation of a detailed CMP to manage construction traffic no residual impacts are anticipated.

Positive impacts are likely to arise due to an increase in employment and economic activity associated with the construction of the proposed development.

The overall predicted likely and significant impact of the construction phase will be short-term, temporary and neutral.

Operational Phase

The proposed development will contribute to further growth and expansion of the neighbourhood contributing to the existing and future populations. The predicted impacts of the Operational Phase are considered to be long term and positive to population and human health.

Chapter 8 Noise and Vibration notes that the predicted impact, once mitigation measures are implemented, of additional traffic, the mechanical plant, retail unit, gym and the creche will be of neutral, imperceptible, and long-term impact. With suitable external building fabric (including glazing and ventilation), the site is considered to be suitable for the proposed residential use.

Chapter 9 Climate and Air Quality notes that the likely overall magnitude of the changes on air quality and climate in the operational stage is imperceptible.

Chapter 11 Traffic and Transportation notes that the impact of the proposed development is anticipated to generate a low level impact on the road network in comparison to the baseline traffic and with the preparation of a Car Parking Strategy, Mobility Management Plan and Site Servicing and Operation Plan managing traffic and transportation impacts.

Overall, the predicted impacts of the Operational Phase are considered to be long term and positive to population and human health.

Biodiversity

Construction Phase

The proposed development will require removal of vegetation within the site. This will result in the loss of dry grassland / scrub and recolonising bare ground habitats. The removal of vegetation could also affect wildlife, such as Pygmy Shrew, Hedgehog, Badger, bats, birds and insects by direct mortality, loss of potential roosting, nesting, commuting and foraging habitat. Implementation of mitigation measures during the construction phase includes clearing away of material not in use, covering of pipes to prevent animals getting trapped and removal of vegetation on a rotational basis to provide cover. Removal of vegetation will take place outside of the bird nesting season.

The loss of habitat will be temporary as mitigation measures are incorporated into the landscape masterplan for the operational phase of the site (see details in section below 'Operational Phase').

Artificial lighting during construction has the potential to impact on bats and other nocturnal species. Works will be restricted to daytime hours, however there might be a need for out-of-hours work in some circumstances where lighting is required. Any lighting used will be directed to avoid light spill where it is not necessary and there will be no lighting of the two mature trees with bat roost potential directly outside of the proposed site.

The predicted impact during the construction phase is assessed to be of negligible impact.

Operational Phase

The proposed development will result in fragmentation and a reduction of available habitat for mammals, including bats, birds and insects. Mitigation measures are incorporated into the landscape masterplan which includes a wildlife corridor along the southern end of the site and south to north through the site with planting of native trees and scrub. This will provide safe commute for mammals and foraging opportunities with the provision of fruits/berries and insects. Wildflower meadows with native Irish wildflowers will be planted in several places across the site which will provide habitat for pollinators.

Lighting within the site may impact on bats commuting and foraging within the site. Mitigation measures include a bat friendly lighting design which will provide a dark corridor along the wildlife corridor for bats to commute across the site.

The site was identified to be partly within the flight lines of Brent Goose. However, due to the restricted number of geese flying over the site, restricted use of Clontarf Community College for foraging and the presence of low buildings and open fields around the proposed site it is considered to have a negligible impact on Brent Geese.

Land, Soil and Geology

Construction Phase

The predicted impact on land, soil and geology at construction phase is limited to the excavations required to construct the foundations and install the proposed works. If mitigation elements are implemented, then the risk of impact is negligible.

Operational Phase

As long as relevant impact mitigation measures are implemented, the impact from the operational phase would be negligible on the surrounding soils, geology and groundwater environment.

Hydrology and Water Services

Construction Phase

There are no predicted significant impacts arising from the construction phase due to the temporary nature of construction and the expected use of portable or temporary toilets only, which will be contracted out to an authorised disposal agent.

A wide range of mitigation measures have been specified for the construction and operational phases of the project. These mitigation methods seek to ensure that construction and operational discharges are controlled to prevent potential pollution impacts to all receiving surface water systems.

Operational Phase

No negative residual impacts are anticipated with the implementation of the construction and operational mitigation measures as stated.

Noise and Vibration

With the incorporation of the above mitigation and CEMP in place, construction noise are likely to be a Temporary Moderate Adverse effect, which is not considered to be significant. Construction vibration at nearby sensitive receptors are well below the limits and not significant. The construction traffic noise impacts are very low and also not significant.

With suitable external building fabric (including glazing and ventilation), the site is considered to be suitable for the proposed residential use.

Climate and Air Quality

Construction Phase

Air Quality

When the dust management measures detailed in the mitigation section of this Chapter (Section 9.7) are implemented, fugitive emissions of dust from the site will be neutral effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error.

Climate

Impacts to climate during the construction phase are considered imperceptible and therefore residual impacts are not predicted. However, due to short-term and temporary nature of these works, the impact causes noticeable changes in the character of the environment but without significant consequences.

Operational Phase

Various elements associated with the construction phase of the proposed development have the potential to impact local ambient air quality, however the potential construction phase impacts shall be mitigated as detailed in Section 9.7 above to ensure there is a minimal impact on ambient air quality for the duration of all construction phase works. It is predicted that the operational phase of the development will not generate air emissions that would have an adverse impact on local ambient air quality or local human health. Air emissions can be further reduced by using operational mitigation measures and detailed in Section 9.7.

The results of the air dispersion modelling study indicate that the impacts of the proposed development on air quality and climate is predicted to be imperceptible with respect to the operational phase for the long and short term.

Landscape and Visual

Construction Phase

In the context of the landscape/ townscape sensitivity judgement, the overall significance of construction stage effects is not considered to exceed moderate and negative.

It is worth noting there will be very little difference in these effects between the currently permitted development and the proposed increase in height in terms of impact from construction works. There is likely to be a marginally extended timeframe for construction to complete the taller buildings, but the duration will remain 'short-term' (1-7 years) in respect of EPA definitions. Thus, the incremental construction stage impacts will be **Negligible** relative to the do-nothing scenario.

Operational Phase

Viewshed Reference Point		Viewing distance to site boundary	Direction of View
VP1	Swords Road near Whitehall Church	374m	S
	Visual Receptor Sensitivity	Visual Magnitude Impact	Significance of Visual Impact
Permitted development Impact Significance	Low	Medium-low	Slight / Positive
Increase in height impact significance	Low	Low-negligible	Slight-imperceptible/ Neutral

Viewshed Reference Point		Viewing distance to site boundary	Direction of View
VP2	Intersection of Swords Road and Collins Avenue West	184m	S
	Visual Receptor Sensitivity	Visual Magnitude Impact	Significance of Visual Impact
Permitted development Impact Significance	Low	Medium-low	Slight/ Positive
Increase in height Impact Significance	Low	Low-negligible	Slight-imperceptible/ Positive

Viewshed Reference Point		Viewing distance to site boundary	Direction of View
VP2a	Swords Road immediately north of site	81	S
	Visual Receptor Sensitivity	Visual Magnitude Impact	Significance of Visual Impact
Permitted development Impact Significance	Low	High medium	Moderate / positive
Increase in height Impact Significance	Low	Low-negligible	Slight-imperceptible/ Neutral

Viewshed Reference Point		Viewing distance to site boundary	Direction of View
VP3	Iveragh Road	105m	SE
	Visual Receptor Sensitivity	Visual Magnitude	Impact
Permitted development Impact Significance	Low	Medium	Slight/ Neutral
Increase in height Impact Significance	Medium low	Negligible	Imperceptible

Viewshed Reference Point		Viewing distance to site boundary	Direction of View
VP3a	Swords Road immediately south of site	50m	N
	Visual Receptor Sensitivity	Visual Magnitude	Impact
Permitted development Impact Significance	Low	High	Moderate/ Positive
Increase in height Impact Significance	Low	Negligible	Slight-imperceptible/ Neutral

Viewshed Reference Point		Viewing distance to site boundary	Direction of View
VP4	Swords Road adjacent to the Bonnington Hotel	264m	NE
	Visual Receptor Sensitivity	Visual Magnitude	Impact
Permitted development Impact Significance	Low	Low-negligible	Slight-imperceptible/ Neutral
Increase in height Impact Significance	Low	Negligible	Imperceptible

Viewshed Reference Point		Viewing distance to site boundary	Direction of View
VP5	Collins Avenue at Whitehall GAA ground	226m	SW
	Visual Receptor Sensitivity	Visual Magnitude	Impact
Permitted development Impact Significance	Low	Medium - Low	Moderate-slight/ Neutral
Increase in height Impact Significance	Low	Low-negligible	Slight-imperceptible/ Neutral

Viewshed Reference Point		Viewing distance to site boundary	Direction of View
VP6	High Park residential estate	128m	W
	Visual Receptor Sensitivity	Visual Magnitude	Impact
			Significance of Visual Impact

Permitted development Impact Significance	Medium Low	Low-negligible	Slight-imperceptible/ Neutral
Increase in height Impact Significance	Medium low	Negligible	Imperceptible

Viewshed Reference Point		Viewing distance to site boundary	Direction of View
VP7	Grace Park Road	269m	NW
	Visual Receptor Sensitivity	Visual Magnitude Impact	Significance of Visual Impact
Permitted development Impact Significance	Low	Negligible	Imperceptible
Increase in height Impact Significance	Low	Negligible	Imperceptible

Traffic and Transportation

Construction Phase

The development during construction is anticipated as generating a low level impact on the road network in comparison to the baseline traffic and with the preparation of a detailed CMP to manage construction traffic no residual impacts are anticipated.

Operational Phase

The development once constructed is anticipated as generating a low level impact on the road network in comparison to the baseline traffic and with the preparation of a Car Parking Strategy, Mobility Management Plan and Site Servicing and Operation Plan managing traffic and transportation impacts.

Material Assets

Construction Phase

Taking into account the above-mentioned mitigation measures, which are designed to avoid and prevent any adverse issues arising during construction, any predicted effects on the surface water, wastewater, water supply, telecommunications, natural gas and electricity supply services during the construction phase are considered to be brief-temporary in nature and imperceptible, where supply is unavoidably disrupted to facilitate the construction phase.

Operational Phase

As surface water drainage, foul water drainage and watermain design has been carried out in accordance with the relevant guidelines and Irish Water have provided a Confirmation of Feasibility, the impacts are neutral, imperceptible and long term.

Waste Management

Construction Phase

A carefully planned approach to waste management as set out in Section 13.7 and adherence to the RWMP during the construction phase will ensure that the impact on the environment will be *short-term, neutral and imperceptible*.

Operational Phase

During the operational phase, a structured approach to waste management as set out in Section 13.7 will promote resource efficiency and waste minimisation. Provided the mitigation measures are implemented and a high rate of reuse, recycling and recovery is achieved, the predicted impact of the operational phase on the environment will be *long-term, neutral and imperceptible*.

Cultural Heritage

Construction Phase

The study area does not include any recorded archaeological monuments and the potential for archaeological remains to exist at the site are very low. As a result of this there are no predicted impacts on the cultural heritage landscape by the proposed development.

Operational Phase

There will be no impact on the cultural heritage landscape during the operational phase of the proposed development.

6 INTERACTIONS

Where an interaction is likely, it is given a reference number in the matrix and detail of the interaction is recorded below. The significance, quality – whether it is positive, negative or neutral – and the duration of the interaction is assessed. The interactions are listed in numerical sequence, purely for referencing purposes.

	Population	Biodiversity	Soil	Hydrology	Noise	Air and Climate	Landscape	Traffic	Waste	Cultural Heritage	Material Assets
Population											
Biodiversity											
Soil	1	9									
Hydrology	2	10	13								
Noise	3	11									
Air and Climate	4		14								
Landscape	5	12	15								
Traffic	6										
Waste	7										
Cultural Heritage											
Material Assets	8										

Table 1 Interaction Matrix

1. Population & Human Health / Soils

There is potential for dust generation during construction works, which under dry and windy conditions could lead to localised dust impacts for the small number of properties proximate to the development site such as Beech Lawn Nursing Home and Highfield Healthcare Centre. However, the implementation of dust management and dust control measures will ensure that the proposed development will not give rise to the generation of any significant quantities of dust. As a result, the impact will be temporary, imperceptible and neutral/ negative.

2. Population & Human Health / Water

Failure or mismanagement of the potable water supply could lead to its contamination during the construction phase. A range of mitigation measures, as outlined in Chapter 7 and the CEMP submitted with this application, will be put in place during the construction phase of the development to ensure this does not occur. The correct implementation of these mitigation measures will ensure that the potential impacts on hydrology and water services during the construction phase will be imperceptible and short term.

3. Population & Human Health / Noise

Increased noise levels during the construction phase will be temporary and are not expected to have a long-term significant adverse effect upon the local population. The application of binding noise limits, hours of operation, along with implementation of the mitigation measures, as identified in Chapter 8 and the CEMP, will ensure that noise and vibration impact will have a negative, moderate, and short-term impact on the surrounding environment.

The impact due to the increased traffic associated with the operational development is expected to be neutral, imperceptible, and long-term.

4. Population & Human Health / Air

The completed development will generate additional emissions to the atmosphere due to traffic associated with the development. However, air quality in the vicinity of the site is expected to remain within air quality standards, and the impact is expected to be imperceptible.

During construction, there may be potential for slight dust nuisance in the immediate vicinity of the site. However, dust control measures, such as wheel washes, covering of fine material etc. will minimise the impacts on air quality. As a result, the impact will be temporary, imperceptible and neutral/ negative.

5. Population & Human Health / Landscape

Existing residents and visitors to the Whitehall area interact with the landscape, such that they will be aware of a significant change at this site from a vacant site to a new residential development with a mix of unit types, building heights, open spaces etc. Chapter 10 notes that this change is positive in the context of the urban fabric of the area.

6. Population & Human Health / Traffic

There will be the construction traffic on the roads in the vicinity of the site for the duration of the construction works. Chapter 11 notes that, following the implementation of the mitigation measures, the impact of this construction traffic will be low level.

Once complete, the proposed development will result in additional traffic on the surrounding roads. Chapter 11 notes that, following the implementation of the MMP submitted with the application, the anticipated impact is expected to be low level.

7. Population & Human Health / Waste

The construction phase of development will generate both hazardous and non-hazardous waste. This could lead to litter or pollution issues which would have a negative impact on the local population. However, once the mitigation measures are implemented, the impact is predicted to be short-term, neutral and imperceptible

Once complete the proposed development will generate increased levels of household and commercial waste. This increase in waste is unavoidable but following the implementation of the waste management plans submitted with the application, the impact is predicted to be long-term, neutral and imperceptible.

8. Population & Human Health / Materials Assets

There is the potential for contamination of potable water supply, gas leaks or explosions, loss of supply of services. With the implementation of the mitigation measures in Chapter 12 the impact of the proposed built services on human health is likely to be imperceptible.

9. Biodiversity / Soils

The construction phase will result in removal of vegetation and soil which is expected to have a negligible impact once the mitigation measures are implanted.

The landscaping masterplan includes a wildlife corridor and therefore the operational phase is expected to have no significant residual impact on biodiversity.

10. Biodiversity / Water

As noted in chapter 5, the closest waterbody to the site is the Tolka River located south of the site and there is no direct connection between the site and the surface water bodies and therefore it is expected that no significant residual effects are likely to arise to biodiversity.

As concluded in the Appropriate Assessment Screening Report submitted with the proposed project is not anticipated to have a significant impact via surface water, groundwater and lands and air pathways to any Natura 2000 site.

11. Biodiversity / Noise

Increased noise levels during the construction phase will only be temporary and are not expected to have a long-term significant adverse effect upon remaining fauna within the wider landscape.

Operational noise will be audible at a low level in the ambient noise and the impact is predicted to be neutral, imperceptible and long-term.

12. Biodiversity / Landscape

Due to the negligible or low local value of the existing biodiversity on the subject site, the removal of habitats during the construction phase will have a neutral and imperceptible impact.

The proposed landscape masterplan includes the planting of native trees and other vegetation and as noted in chapter 5, will have no significant residual impact on biodiversity.

13. Soils / Water

The construction phase could result in uncontrolled sediment erosion, contaminated silty run-off, and pollution of surface waters by mobilised suspended solids. Mitigation measures, as outlined in Chapter 7 and the CEMP, will be implemented during construction to prevent these potential impacts. As a result the impact will be negligible.

14. Soils / Air

Exposed soil during the construction phase of the proposed scheme will give rise to increased dust emissions. Chapter 9 notes that when the dust management measures, as outlined in Chapter 9, are

implemented, fugitive emissions of dust from the site will be neutral effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error.

15. Soils/Landscape

Residual soils arising as a result of excavation at the development site will be used in landscaping works in the proposed public open spaces as much as possible rather than transporting off-site. This impact will be imperceptible and long-term.

7 CONCLUSION

In conclusion, the subject site is below the thresholds set out in set out in Annex I and Annex II of the EIA, Directive and therefore an EIAR is not required for the proposed development. However, it was deemed prudent to prepare an EIAR due to the cumulation with other existing development and/or development the subject of a consent for proposed development within the immediate area. The methodology is informed by the available guidance, legislation and directives.

An Appropriate Assessment screening report is also submitted as part of this application. It is concluded that this application, whether individually or in combination with other plans and projects, will have no impacts upon the Natura 2000 sites. Therefore, this application does not need to proceed to stage II of the appropriate assessment.

The implementation of the mitigation measures outlined in each EIAR chapter will reduce the potential negative impacts of the proposed development in both the construction and operational phases of the development.