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1 INTRODUCTION AND METHODOLOGY

1.1 Introduction

This Environmental Impact Assessment Report (EIAR) has been commissioned by the Applicant, Raheny 3 Limited Partnership, in respect of a planning application for a mixed-use residential development on lands east of St. Pauls College, Sybil Hill Road, Raheny, Dublin 5.

The site is bound to the north, east and south by St Anne's Park and to the west by residential development at The Meadows, Sybil Hill House (a Protected Structure) and St Paul's College. Vehicular access to the site is from Sybil Hill Road.

The Proposed Development consists of the construction of a residential and nursing home development set out in 7 no. blocks, ranging in height from 4-7 storeys to accommodate 580 no. apartments, residential tenant amenity spaces, a crèche and a 100-bed nursing home. The site will accommodate car parking spaces, bicycle parking spaces, storage, services and plant areas at both basement and podium level.

Landscaping will include extensive communal amenity areas, and a significant public open space provision on the east and south of the site. The proposed application includes all site landscaping works, green roofs, substations, boundary treatments, lighting, servicing, signage, surface water attenuation facilities and associated and ancillary works, including site development works and services above and below ground. For a full description of the Proposed Development please refer to the Statutory Notices.

1.1.1 Quality Assurance and Competence

This Chapter was prepared by Louise Hewitt, Environmental Consultant, Enviroguide Consulting. Louise has a Master of Science (Hons) in Environmental Resource Management from University College Dublin and a Bachelor of Science (Hons) in Biology from Maynooth University. Louise has experience preparing Environmental Impact Assessment (EIA) Screening Reports, Introduction Chapters, Population and Human Health Chapters and Archaeology and Cultural Heritage Chapters of EIARs.

1.2 Definition of EIA and EIAR

EIA is a systematic examination of the potential impacts of a Proposed Development on the environment. In assessing the environmental impacts, this EIAR will evaluate the existing situation and assess any potential impacts of the Proposed Development. Where potential impacts are identified proposed mitigation measures will be identified. In addition, the in-combination effects of any other known plans or projects will be identified and assessed.

Under Schedule 5 of the Planning and Development Regulations 2001, as amended (the Planning Regulations), an EIAR (formerly an EIS) is required to accompany certain planning applications for specified projects as part of the EIA process.

The EIAR describes the outcomes of the iterative EIA process which was progressed in parallel with the project design process. In doing so, it forms the first part of the EIA process that will be completed by Dublin City Council, as the competent authority, which in turn will be

required to examine, analyse, and evaluate the direct and indirect effects of the development on the various factors listed in Directive 2011/92/EU, as amended by 2014/52/EU (the EIA Directive).

> *"The EIAR should be prepared at a stage in the design process where changes can still be made to avoid adverse effects. This often results in the modification of the project to avoid or reduce effects through redesign" (EPA, 2022)*

Where significant and likely environmental effects are identified that are unacceptable, the EIA process aims to quantify and minimise the effects of the impact that the specified development has on the environment through appropriate mitigation measures and where necessary, subsequent monitoring.

This process is illustrated in Figure 1-1.

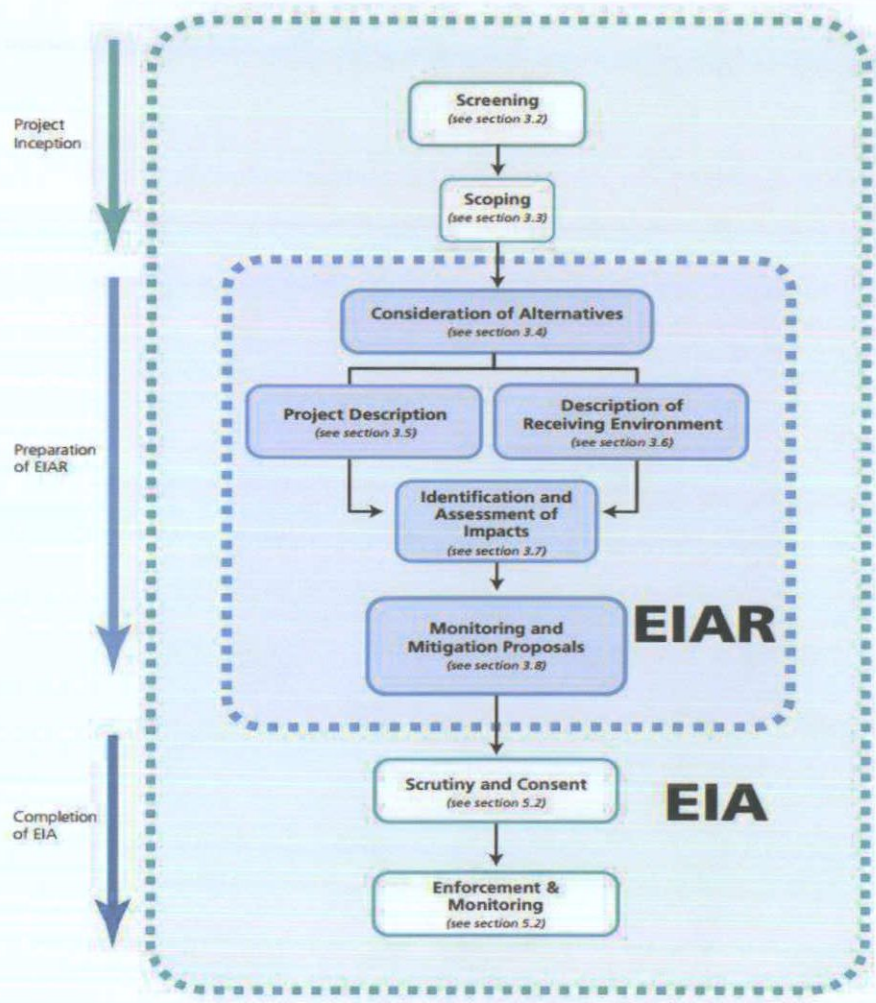


Figure 1-1: EIA Process

The purpose of the EIAR is to provide the Planning Authority with information on the likely and significant effects on the environment by the Proposed Development. This EIAR was prepared in parallel with the project design process and reflects the potential cumulative impact of other developments.

1.3 EIA Legislation

The EIA Directive requires EIA to be carried out for certain projects as listed in Annex I of the Directive. The EIA Directive is transposed into Irish law through the Planning and Development Act 2000 (as amended) (the Planning Act) and the Planning Regulations.

1.4 EIA Guidelines

This EIAR has been prepared in accordance with all relevant guidance. The documents listed below are common to all chapters. Additional specific guidelines will be referred to in each specific chapter.

- Guidelines on the Information to be contained in Environmental Impact Statements (EPA 2002);
- Advice Notes on Current Practice in the Preparation of Environmental Impact Statements (EPA 2003);
- Draft Advice Notes for Preparing Environmental Impact Statements (EPA draft September 2015a);
- Draft Revised Guidelines on the Information to be Contained in Environmental Impact Statements (EPA draft September 2015b);
- Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EPA May 2022);
- Environmental Assessments of Plans, Programmes and Projects – Rulings of the Court of Justice of the European Union (European Union 2017);
- Environmental Impact Assessment of Projects – Guidance on Scoping (Directive 2011/92/EU as amended by 2014/52/EU) (European Union 2017);
- Guidance of Integrating Climate Change and Biodiversity into Environmental Impact Assessment (European Union 2013);
- Environmental Impact Assessment of Projects – Guidance on the preparation of the Environmental Impact Assessment Report (European Union 2017);
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (Department of Environment, Community and Local Government 2013);
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (Government of Ireland 2018);
- Key Issues Consultation Paper on the Transposition of 2014 EIA Directive (2014/52/EU) in the Land Use Planning and EPA Licencing Systems; (Department of Housing, Planning, Community and Local Government 2017);

- Circular PL 05/2018 -Transposition into Planning Law of Directive 2014/52/EU amending Directive 2011/92/EU on the effects of certain public and private projects on the environment (the EIA Directive) And Revised Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (Department of Housing, Planning and Local Government 2018);

- Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions (European Communities 1999); and
- Implementation of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (European Communities 2003).
- Appropriate Assessment Screening for Development Management; OPR Practice Note PN01(Office of the Planning Regulator March 2021)
- Office of the Planning Regulator (OPR) Environmental Impact Assessment Screening Practice Note (2021).

The EIA Directive defines EIA as a process. Article 1(2)(g) states that EIA means:

> *"(i) the preparation of an environmental impact assessment report by the developer, as referred to in Article 5(1) and (2);*
>
> *(ii) the carrying out of consultations as referred to in Article 6 and, where relevant, Article 7;*
>
> *(iii) the examination by the competent authority of the information presented in the environmental impact assessment report and any supplementary information provided, where necessary, by the developer in accordance with Article 5(3), and any relevant information received through the consultations under Articles 6 and 7;*
>
> *(iv) the reasoned conclusion by the competent authority on the significant effects of the project on the environment, taking into account the results of the examination referred to in point;*
>
> *(iii) and, where appropriate, its own supplementary examination; and*
>
> *(v) the integration of the competent authority's reasoned conclusion into any of the decisions referred to in Article 8a".*

The EIA Directive requires the EIAR to identify, describe and assess, in an appropriate manner and in light of each individual case, the direct, indirect, and cumulative significant effects of the Proposed Development on factors of the environment including:

a) Population and human health

b) Biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC (respectively, the Habitats Directive and the Birds Directive)

c) Land, soil, water, air, and climate

d) Material assets, cultural heritage, and the landscape

The interaction between the factors referred to in points (a) to (d)

1.5 Screening for EIA

'Screening' is the term used to describe the process for determining whether a Proposed Development requires an EIA by reference to mandatory legislative threshold requirements or in the case of sub threshold development, by reference to the type and scale of the Proposed Development and the significance or the environmental sensitivity of the receiving baseline environment.

Annex 1 of the EIA Directive requires as mandatory an EIA for all development projects listed therein.

Schedule 5, Part 1, of the Planning Regulations transposes Annex 1 of the EIA Directive directly into Irish planning legislation. An EIAR is required to accompany a planning application for development of a class set out in Schedule 5, Part 1 of the Planning Regulations which exceeds a limit, quantity or threshold set for that class of development.

Schedule 5, Part 2 of the Planning Regulations defines projects that are assessed on the basis of set mandatory thresholds for each of the project classes including:

Schedule 5, Part 2 - Infrastructure projects

"10. Infrastructure projects

10. (b)(i) Construction of more than 500 dwelling units.

10 (b)(ii) Construction of a car-park providing more than 400 spaces, other than a car-park provided as part of, and incidental to the primary purpose of, a development.

10(b)(iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.

(In this paragraph, "business district" means a district within a city or town in which the predominant land use is retail or commercial use.)

The Proposed Development provides for 580 no. residential units, which is over the 500 dwelling unit threshold and subsequently a mandatory EIAR is required.

1.6 Scope of the EIAR

'Scoping' is a process of deciding what information should be contained in an EIAR and what methods should be used to gather and assess that information. It is defined in EC Guidance on EIA Scoping 2001 as:

'Determining the content and of the matters which should be covered in the environmental information to be submitted in the EIAR'

The content of this EIAR was informed by a scoping process carried out by the Applicant, design team and EIAR consultants to identify the core issues likely to be most important during the EIA process.

The EIAR prepared for the Proposed Development has endeavoured to be as thorough as possible and therefore all of the issues listed in Schedule 6, Sections 1 and 2 of the Planning Regulations have been addressed in the EIAR.

The scope of this EIAR has had regard to the documents listed in Section 1.4 above, together with:

- The requirements of Part X of the Planning Act and also Part 10 of the Planning Regulations;
- The requirements of the Dublin City Development Plan 2016-2022;
- The requirements of the Draft Dublin City Development Plan 2022-2028;
- Relevant Regional and National Planning Policy Documents;
- The receiving environment and any vulnerable or sensitive local features and current uses;
- Previous relevant planning history and applications that have been submitted on the subject and adjoining lands;
- The likely and significant impacts of the Proposed Development on the environment; and
- Available mitigation measures for reducing or eliminating any potentially significant undesirable impacts.

In addition, the individual chapters of this EIAR should be referred to for further information on the documents consulted by each individual consultant.

1.7 Purpose and Objectives of the EIAR

The purpose of this EIAR is to assist in the EIA process, by identifying likely significant environmental impacts resulting from the Proposed Development, to describe the means and extent by which they can be reduced or mitigated, to interpret and communicate information about the likely impacts and to provide an input into the decision making and planning process.

The fundamental principles to be followed when preparing an EIAR are:

- Anticipating, avoiding, and reducing significant effects;
- Assessing and pursuing preventative action;
- Maintaining objectivity;
- Ensuring clarity and quality;
- Providing relevant information to decision makers; and
- Facilitating public and stakeholder consultation.

EIA is an iterative process. The EIAR captures this assessment process and describes its outcomes. The EIAR documents the consideration of environmental effects and provides

transparent, objective and replicable documentary evidence of the EIA evaluation and decision-making processes.

The EIAR provides information on any identified effects arising as a consequence of the Proposed Development and which:

- Are environmentally based;
- Are likely to occur; and
- Have significant and adverse effects on the environment.

It also documents how the Proposed Development design incorporates measures for the purposes of impact avoidance, reduction or amelioration, as well as to explain how significant adverse effects will be avoided.

The key objective of this EIAR is to inform the Planning Authority on the acceptability of the Proposed Development, in carrying out an EIA, in order to reach a decision in the full knowledge of the Proposed Development's likely significant impacts on the environment, if any.

1.8 Format and Structure of this EIAR

The formation of an EIAR necessitates the co-ordination and collation of associated, yet diverse specialised areas of assessment. The EIA approach involves the examination of each environmental factor, describing the existing baseline environment, the Proposed Development, its likely impacts, and direct and indirect significant effects pertaining to that environmental factor and mitigation measures, where appropriate.

The topics examined in this EIAR are categorised under the environmental factors prescribed under the EIA Directive:

- Population and Human Health
- Biodiversity
- Land & Soils
- Water
- Air
- Climate
- Material Assets
- Cultural Heritage
- Landscape

The expected effects deriving from the vulnerability of the Proposed Development to risks of major accidents and/or disasters must also be examined.

The structure of the EIAR is set out in Table 1-1.

Table 1-1: Structure of the EIAR

Chapter	Title	Content
1	Introduction and Methodology	Chapter 1 sets out the purpose, methodology and scope of the document.
2	Description of the Proposed Development & Assessment of Alternatives	As required under Article 5(1)(a) of the EIA Directive 2014/52/EU (subsequently referred to as the Directive), Chapter 2 provides a description of the site, design and scale of the Proposed Development, and as required under Article 5(d), an evaluation of the reasonable alternative design approaches.
3	Planning and Policy Context	Chapter 3 sets the national, regional and local policy framework for the Proposed Development.
4	Population and Human Health	Chapter 4 covers the requirement for assessment on potentially significant effects to population and human health as required under Article 3(1)(a) of the Directive.
5	Biodiversity	Chapter 5 covers the requirement of Article 3(1)(b) of the Directive to assess potentially significant effects on biodiversity (which previously referred only to 'fauna and flora'), having particular attention to species and habitats protected under the Habitats Directive and the Birds Directive.
6	Land and Soils	Chapter 6 covers the requirement under Article 3(1)(c) of the Directive on Land and Soil to assess the type of soil and geology in the area of the Proposed Development and identifies any potentially significant effects.
7	Hydrology and Hydrogeology	Chapter 7 covers the requirement under Article 3(1)(c) of the Directive to assess potentially significant effects to water quality arising from the Proposed Development. This Chapter will assess any potential effects from pollution and discharges to surface water.
8	Air Quality and Climate	Chapter 8 covers the requirement under Article 3(1)(c) of the Directive on Air and Climate to assess potentially significant effects to air quality in the surrounding environment.
9	Noise and Vibration	Chapter 9 covers the requirement to assess potentially significant effects from airborne noise and vibration as required under Article 3(1)(a) of the Directive on Human Health.
10	Landscape and Visual Amenity	Chapter 10 covers the requirement under Article 3(1)(d) of the Directive to assess potentially significant effects on the landscape. This Chapter will assess any potential visual impacts to landscape caused by the Proposed Development.
11	Archaeology and Cultural Heritage.	Chapter 11 covers the requirement under Article 3(1)(d) of the Directive to assess potentially significant effects on cultural heritage.
12	Material Assets _Traffic, Utilities and Waste Management	Chapter 12 covers the requirement under Article 3(1)(d) of the Directive to assess potentially significant effects on material assets. This Chapter will identify impacts to existing utilities and

Chapter	Title	Content
		infrastructure from the development of the Proposed Development. Article 5(1), Annex IV, point 1(d) of the Directive requires estimates of quantities and types of waste produced during construction and operation phase. Chapter 12 will also present an assessment of how resources and waste will be managed for the Proposed Development.
13	Risk Management	Chapter 13 covers the requirement under Article 3(2) of the Directive to include the expected effects deriving from the vulnerability of the Proposed Development to risks of major accidents and/or disasters.
14	Interactions	As required under Article 3(1)(e) of the Directive, Chapter 14 provides an assessment of the interaction between all of the environmental aspects referred to in this EIAR.
15	Mitigation and Monitoring	Chapter 15 describes mitigation and monitoring as required under Article 5(1) of the Directive in order to avoid, prevent, reduce, or if possible, offset any identified significant adverse effects on the environment and, where appropriate, describes any proposed monitoring arrangements.

This approach employs standard descriptive methods, replicable prediction techniques and standardised impact descriptions to provide an appropriate evaluation of each environmental topic under consideration.

1.9 Methodology Used to Produce this EIAR

The methodology employed to produce this EIAR is detailed in Table 1-2. The objective is to evaluate each environmental topic, both individually and collectively, in a systematic and objective manner.

The methodology will outline the methods used to describe the baseline environmental conditions as well as predict the likely impacts on the environment of the Proposed Development. The data and survey requirements for each chapter will vary depending on the environmental topic and will be chosen by the particular specialist based on relevant legislation, best practice guidance, policy requirements, and professional judgement. Similarly, the study area is also defined for each environmental topic based on professional judgement and experience.

All environmental topics require desktop reviews of all relevant data at a minimum. These desktop studies are then supplemented by field studies and consultations with relevant stakeholders, for example interested parties, statutory bodies, and local authorities, as required for each environmental topic.

An outline of the methodology employed consistently in each chapter of the EIAR to examine each environmental topic is provided in Table 1-2:

Table 1-2: Methodology Employed to Produce each EIAR Chapter.

Introduction	Provides an overview of the specialist area and specifies the specialist who prepared the assessment.
Study Methodology	This subsection outlines the method by which the relevant impact assessment has been conducted within that chapter.
The Existing Receiving Environment (Baseline Situation)	This section will describe and assess the receiving environment, the context, character, significance, and sensitivity of the baseline receiving environment into which the Proposed Development will fit. This analysis also takes account of any other proposed developments that are likely to proceed in the immediate surroundings.
Characteristics of the Proposed Development	Consideration of the '*Characteristics of the Proposed Development*' allows for a projection of the '*level of impact*' on any particular aspect of the environment that could arise. For each chapter, those characteristics of the Proposed Development which are relevant to the area of study are described; for example, the chapter on landscape and visual impact addresses issues such as height, design and impact on the surrounding landscape.
Potential Impact of the Proposed Development	This section provides a description of the specific, direct, and indirect, effects that the Proposed Development may have. This analysis is provided with reference to both the Existing Receiving Environment and Characteristics of the Proposed Development sections, while also referring to the: (i) magnitude and intensity, (ii) integrity, (iii) duration and (iv) probability of impacts. The assessment addresses whether the impacts are direct, indirect, secondary, or cumulative in nature. It also looks at the timescale of such impacts e.g. are they short, medium, long-term, and are they of a temporary, permanent, continuous or intermittent nature, and are they positive or negative impacts. The impact interactions are also addressed.
Do Nothing Impact	In order to provide a qualitative and equitable assessment of the Proposed Development, this section considers the Proposed Development in the context of the likely impacts upon the receiving environment should the Proposed Development not take place.
Avoidance, Remedial and Mitigation Measures	This section of each chapter describes the mitigation measures which are required. The requirement to describe mitigation measures is laid out in the EIA Directive, as implemented by the Planning Act and the Planning Regulations. Avoidance, remedial and mitigation measures describe any corrective or mitigative measures that are either practicable or reasonable, having regard to the potential impacts of the Proposed Development. This includes avoidance, reduction and remedy measures as set out in Section 4.7 of the Development Management Guidelines 2007, to reduce or eliminate any significant adverse impacts identified.
Residual Impacts of the Proposed Development	This section allows for a qualitative description of the resultant specific direct, indirect, secondary, cumulative, short, medium and long-term, temporary, permanent, continuous, or intermittent, positive and negative effects as well as impact interactions which the Proposed Development may have, assuming all mitigation measures are fully and successfully applied.
Monitoring	This involves a description of monitoring in a post-development phase, if required. This section addresses the effects that require monitoring, along with the methods and the agencies that are responsible for such monitoring.

Reinstatement	While not applicable to every aspect of the environment considered within the EIAR, certain measures may need to be proposed to ensure that in the event of the proposal being discontinued, there will be minimal impact to the environment.
Interactions	This section provides a description of impact interactions together with potential indirect, secondary, and cumulative impacts.
Difficulties Encountered in Compiling Information	The EIA Directive requires that the EIAR includes *'details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information, and the main uncertainties involved'* (EIA Directive, Annex IV, Part 6). Each chapter that contains an environmental baseline and assessment contains a section outlining any difficulties encountered in compiling that chapter.

1.10 EIAR Project Team

Table 1-3: EIAR Project Team

Chapter	Consultant Name and address	Specialist Area
1.0 Introduction and Methodology including Non-Technical Summary	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN Janet O'Shea / Louise Hewitt	Multidisciplinary Planning and Environmental Consultants
2.0 Project Description and Alternatives Examined	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN Nikita Coulter	Multidisciplinary Planning and Environmental Consultants
3.0 Planning & Policy Context	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN Mairead Foran Brady Shipman Martin, Mountpleasant Business Centre, Ranelagh, Dublin D06 X7P8 Sorcha Turnbull	Multidisciplinary Planning and Environmental Consultants Planning and Development Consultants
4.0 Population and Human Health	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN Janet O'Shea / Louise Hewitt	Multidisciplinary Planning and Environmental Consultants

5.0 Biodiversity	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN Liam Gaffney	Multidisciplinary Planning and Environmental Consultants
6.0 Land and Soils	Waterman Moylan, EastPoint Business Park, Alfie Byrne Rd, East Wall, Dublin 3, D03 H3F4 Stephen Dent Neville	Engineering and Environmental Consultants PLAN NO: LRD6002/22-S3 REC:06/09/2022
7.0 Hydrology & Water	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN Candice Serbu	Multidisciplinary Planning and Environmental Consultants
8.0 Air Quality & Climate	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN Aoife Grogan / Laura Griffin	Multidisciplinary Planning and Environmental Consultants
9.0 Noise and Vibration	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN Laura Griffin	Multidisciplinary Planning and Environmental Consultants
10.0 Landscape & Visual Amenity	Macro Works Ltd, Cherrywood Business Park, Bray Rd, Cherrywood, Loughlinstown, Co. Dublin. Jamie Ball	Landscape and Visual (LVIA) Consultants
11.0 Archaeology, Architectural, and Cultural Heritage	Archaeology and Built Heritage Ltd, Spade Enterprise Centre, St. Paul's Smithfield, North King Street, Dublin 7. James Kyle IAC, Unit G1, Network Enterprise Park, Kilcoole, Co. Wicklow Rob Goodbody	Archaeological Consultants Architectural Consultant
12.0 Material Assets: Traffic, Waste, and Utilities	<u>Waste & Utilities</u> Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN Nikita Coulter	Multidisciplinary Planning and Environmental Consultants

	Traffic Waterman Moylan, EastPoint Business Park, Alfie Byrne Rd, East Wall, Dublin 3, D03 H3F4 Stephen Dent Neville	Engineering and Environmental Consultants .
13.0 Risk Management	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN Nikita Coulter	Multidisciplinary Planning and Environmental Consultants
14.0 Interactions	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN Louise Hewitt	Multidisciplinary Planning and Environmental Consultants
15.0 Mitigation and Monitoring Measures	Enviroguide Consulting, 3D Core C, The Plaza, Park West, D12F9TN Louise Hewitt	Multidisciplinary Planning and Environmental Consultants

1.11 Non-Technical Summary

A Non-Technical Summary of the EIAR has also been prepared. The EIA Directive states that one of the objectives of the EIA process is to ensure that the public is fully aware of the environmental implications of any decisions. EPA Guidelines note that the non-technical summary of the EIAR should facilitate the dissemination of the information contained in the EIAR and that the core objective is to ensure that the public is made as fully aware as possible of the likely environmental impacts of projects prior to a decision being made by the planning authority. A Non-Technical Summary of the EIAR has therefore been prepared which summarises the key environmental impacts and is provided as a separately bound document.

1.12 Links between EIAR and Appropriate Assessment

A Screening Report for Appropriate Assessment (AA) has been carried out for the Proposed Development to determine if there is a risk of effects to any Natura 2000 site. The AA Screening Report was unable to exclude the possibility that the Proposed Development will have a likely significant effect on the following European Sites; North Dublin Bay SAC (000206), North Bull Island SPA (004006), South Dublin Bay and River Tolka Estuary SPA (004024), Baldoyle Bay SPA (004016), Malahide Estuary SPA (004025) and Rogerstown Estuary SPA (004015). Accordingly, a Natura Impact Statement has been prepared for the Proposed Development. Where potentially significant effects were identified, a range of mitigation and avoidance measures have been suggested to help avoid them. This NIS has concluded that, ensuring the avoidance and mitigation measures are implemented as proposed, the Proposed Development will not have an adverse effect on the integrity of the above European sites, individually or in combination with other plans and projects.

While AA is required by the proposer of any plan or project likely to have an adverse effect on a Natura 2000 site, EIA is required for projects listed in Annex I of the EIA Directive. The requirement for EIA relative to projects listed in Annex II of the EIA Directive is determined on a case-by-case basis. While these two different types of assessment are independent and are required by separate legislation, namely the Birds and Habitat Directives (i.e. AA) and the EIA Directive (i.e. EIAR) there is a degree of overlap, particularly in the biodiversity chapter of the EIAR.

1.13 Availability of EIAR Documents

A copy of this EIAR document and Non-Technical Summary is available for purchase at the offices of Dublin City Council at a fee not exceeding the reasonable cost of reproducing the document.

1.14 Statement of Difficulties Encountered

No exceptional difficulties were experienced in compiling the necessary information for the Proposed Development. Where any specific difficulties were encountered these are outlined in the relevant chapter of the EIAR.

1.15 Quotations

The application is also accompanied by a Non-Technical Summary of the EIAR, which is laid out in a similar, but condensed format to the main EIAR. The structure, presentation, and the Non-Technical Summary of the EIAR, as well as the arrangements for public access, all facilitate the dissemination of the information contained in the EIAR. The core objective is to ensure that the public and local community are aware of the likely environmental impacts of the Proposed Development prior to the granting of consent.

However, it is important to acknowledge that the EIAR by its nature contains statements about the Proposed Development, some of which are positive and some less than positive. Selective quotation or quotations out of context can give a very misleading impression of the findings of the study. Therefore, the study team urges that quotations should, where reasonably possible, be taken from the conclusions of specialists' sections or from the Non-Technical Summary and not selectively.

The EIA Regulations require that difficulties such as technical deficiencies, lack of information or knowledge encountered in compiling any specified information for the EIAR be described. There were no such difficulties encountered in the production of this EIAR.

2 PROJECT DESCRIPTION & DESCRIPTION OF ALTERNATIVES

2.1 Introduction and Terms of Reference

This Chapter provides a detailed description of the Proposed Development together with details of the existing environment. In accordance with Article 5(1)(a) of the EIA Directive, the description of the project should comprise:

'Information on the site, design, size and other relevant features of the project'.

A description of the Proposed Development and its surroundings is provided in this Chapter, together with the proposed design parameters. This description sets out the basis against which the specialist assessments presented in this EIAR have been undertaken.

The EIAR must contain information in relation to the environmental impact of both the Proposed Development and all other "reasonable" alternatives studied. An indication of the main reasons for the option chosen must be given, taking into account the effects of the Proposed Development on the environment.

This Chapter was prepared by Senior Environmental Consultant Nikita Coulter of Enviroguide Consulting. Nikita Coulter has a B.Sc. in Zoology (Hons) from University College Dublin, an M.Sc in Biodiversity and Conservation, a Postgraduate Diploma in Environmental Engineering from Trinity College Dublin, and a NEBOSH accredited International Diploma in Environmental Risk Management. Nikita has 8 years professional experience as an Environmental Compliance Specialist.

2.2 Site Location and Description

Raheny 3 Limited Partnership are applying for permission for development on lands east of St Paul's College, Sybil Hill Road, Raheny, Dublin 5. The site is bound to the north, east and south by St Anne's Park and to the west by residential development at The Meadows, Sybil Hill House (a Protected Structure) and St Paul's College. Vehicular access to the site is from Sybil Hill Road.

The total site area is 6.7 hectares with a site developable area of 6.18 hectares. The site is currently a greenfield site (Figure 2-1).

Figure 2-1: Total Site Area and Site Developable Area

2.3 Site History / Background

St Anne's Park is an extensive, historic parkland and a major amenity and public open space. The c. 97 ha Park is a well-used, popular amenity and recreational resource extending from its entrance off Sybil Hill Road in the west to the coast at Dollymount in the East.

St Paul's College was established in 1950 and forms part of a belt of religious lands located on both sides of Sybil Hill Road. The planned capacity of the school is 600 no. pupils with the ability to accommodate up to 650 no. pupils without significant additional accommodation.

The majority of the site of the Proposed Development, together with the adjoining St Paul's College and the Vincentian Order in Sybil Hill House, is zoned objective Z15 in the Development Plan "*To protect and provide for institutional and community uses*". Under the zoning objective, the proposed residential use is open for consideration. A small section of the site is zoned Z9 as this includes lands within St. Anne's Park required to provide for the routing of a surface water discharge from the site via St. Anne's Park to the Naniken River. No residential development is proposed on the lands contained within the application boundary which are zoned Z9.

2.4 Project Overview

The Proposed Development consists of the construction of a residential and nursing home development set out in 7 no. blocks, ranging in height from 4-7 storeys to accommodate 580 no. apartments, residential tenant amenity spaces, a crèche and a 100-bed nursing home. The site will accommodate car parking spaces, bicycle parking spaces, storage, services and plant areas at both basement and podium level.

Landscaping will include extensive communal amenity areas, and a significant public open space provision on the east and south of the site. The proposed application includes all site landscaping works, green roofs, substations, boundary treatments, lighting, servicing, signage, surface water attenuation facilities and associated and ancillary works, including site development works and services above and below ground. For a full description of the Proposed Development please refer to the Statutory Notices.

Figure 2-2 and Figure 2-3 detail the Site Location and the Proposed Site Layout Plan, respectively.

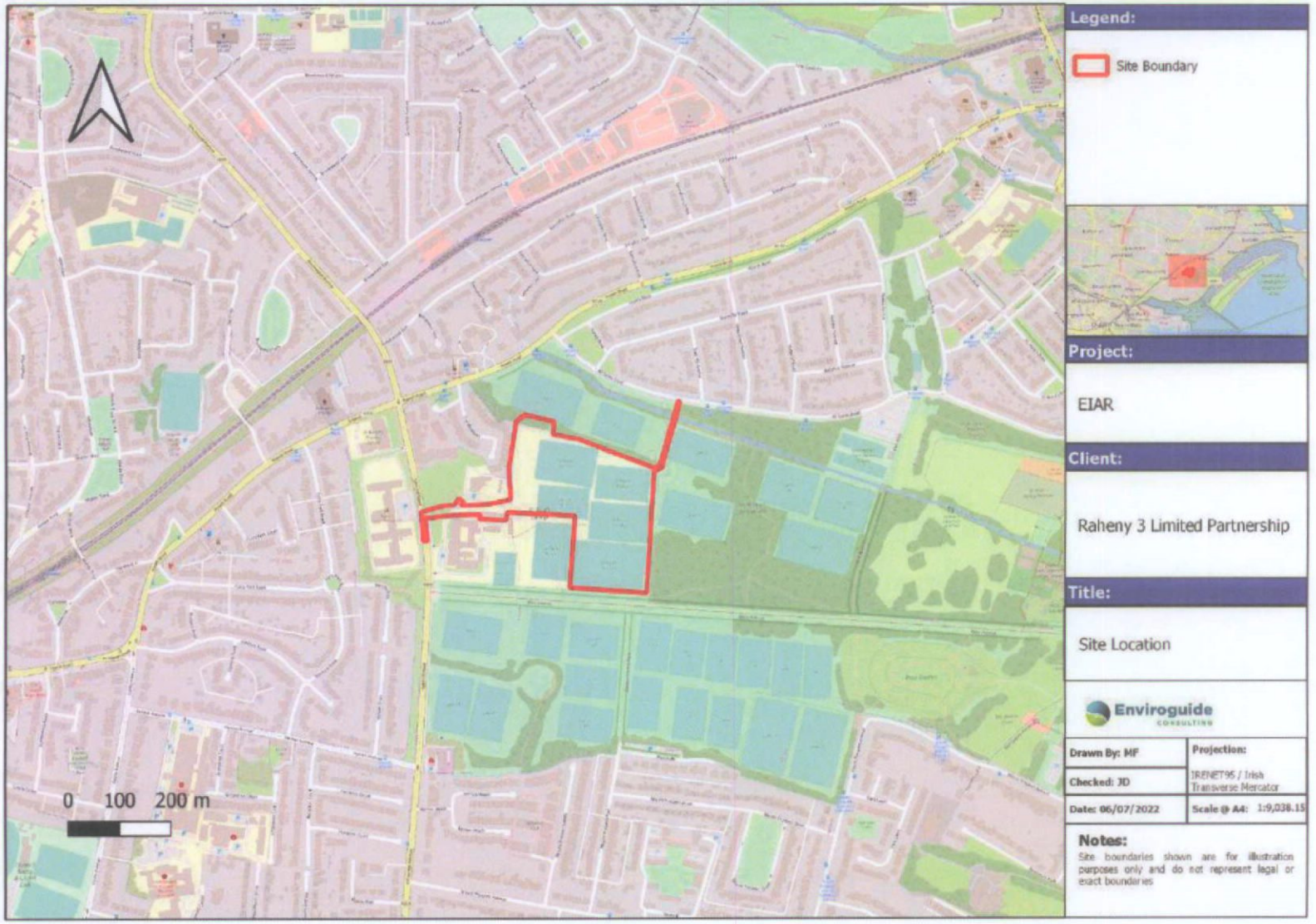


Figure 2-2 Location of the Proposed Development

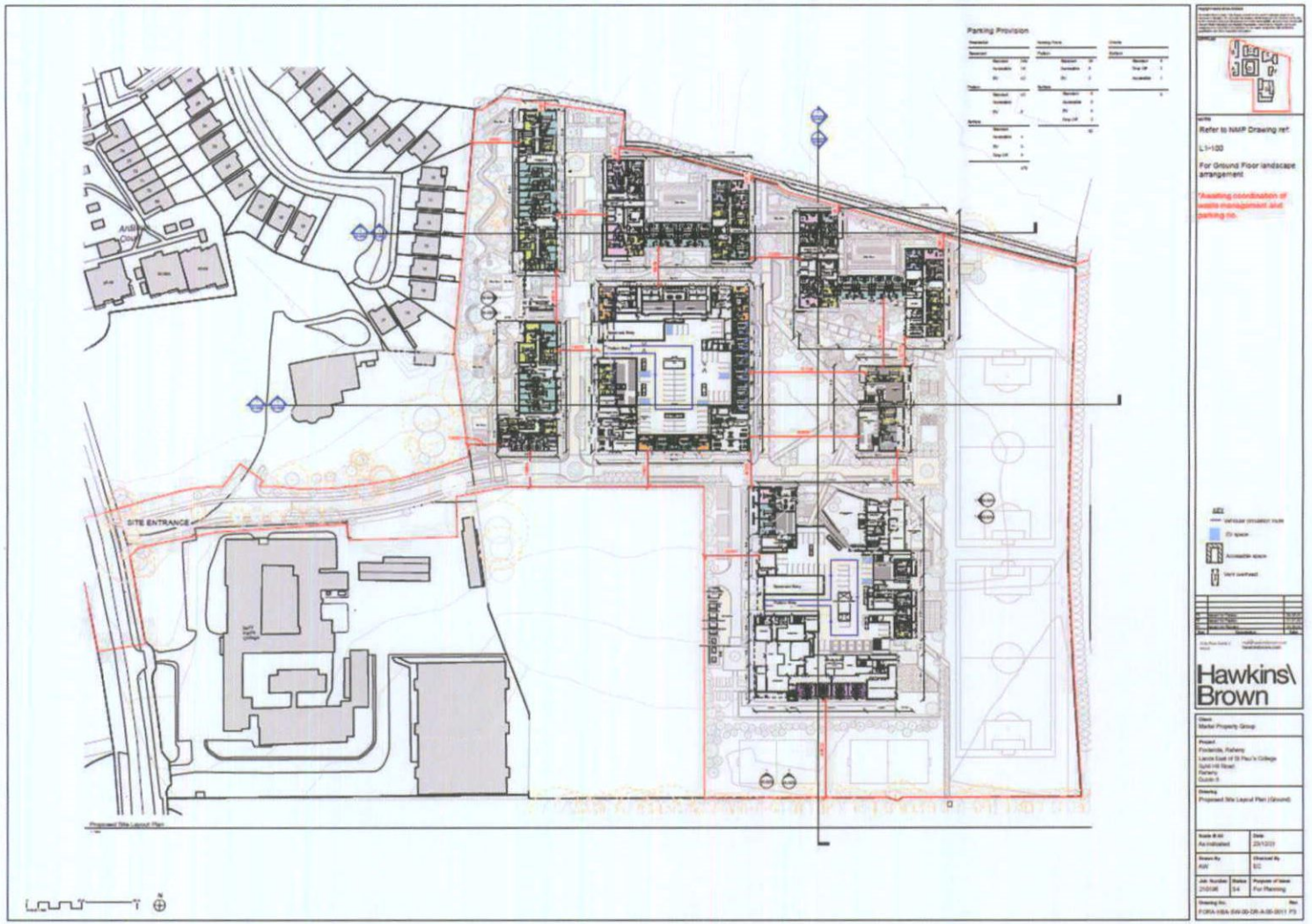


Figure 2-3 Proposed Site Layout of the Site Developable Area (Hawkins Brown Drawing no. FORA-HBA-SW-00-DR-A-00-0011)

2.5 Construction Phase

The Proposed Development is to be constructed in two stages which will include, in broad terms, the following:

- Stage I: Site demolition works, site clearance and preparation work for the construction. A site compound including offices and welfare facilities will be set up by the Main Contractor.

- Stage II: Site development and construction. The development includes all associated site works and infrastructure which includes roads, utilities, foul and surface water drainage.

The Construction Phase is intended to be an 18-month programme. The operational hours for the site will be 08:00 to 17:00 Mondays to Fridays and 08:00 to 14:00 Saturdays. No work is permitted on Sundays or public holidays. Deviation from these hours will only be allowed in exceptional circumstance with prior written approval from the planning authority.

2.6 Statutory Planning Context

The site of the Proposed Development is subject to National, Regional and Local level planning policy. The following outlines the key planning policy documents of relevance to the Proposed Development.

2.6.1 National

- Project Ireland 2040: National Planning Framework
- Sustainable Urban Housing: Design Standards for New Apartments 2020
- Urban Development and Building Heights – Guidelines for Planning Authorities 2018
- Housing for All – A New Housing Plan for Ireland (2021)
- Design Manual for Urban Roads & Streets 2013
- Climate Action and Low Carbon Development Act 2015 (as amended, 2021)
- Planning System and Flood Risk Management Guidelines 2009
- Sustainable Residential Development in Urban Areas Guidelines 2009
- Urban Design Manual, A Best Practice Guide 2009
- Smarter Travel, A Sustainable Transport Future. A New Transport Policy for Ireland 2009-2020
- National Investment Framework for Transport in Ireland (NIFTI) (2021)
- Transport Strategy for the Greater Dublin Area 2016 – 2035

2.6.2 Regional

- Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031

2.6.3 Local

- Dublin City Council Development Plan 2016-2022

The policies and objectives contained in the various plans / policies that are relevant to the Proposed Development are addressed in detail in Chapter 3 (Planning and Policy Context) of this EIAR.

2.7 Description of Alternatives

2.7.1 Introduction

Consideration of reasonable alternatives is an important aspect of the EIA process and is necessary to evaluate the likely environmental consequences of a range of development strategies for the site of the Proposed Development within the constraints imposed by environmental and planning conditions. This section provides a description of the reasonable alternatives that have been considered.

Article 5 of the EIA Directive requires that that the EIAR contain:

"*A description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the Proposed Development and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.*"

This section of the EIAR provides an explanation of the reasonable alternatives examined throughout the design and consultation process. This serves to indicate the main reasons for choosing the Proposed Development, taking into account and providing a comparison of the environmental effects. The alternatives may be described at four levels:

- Alternative locations
- Alternative designs
- Alternative layouts
- Alternative processes

Pursuant to Section 3.4.1 of the Environmental Protection Agency (EPA) Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (*EPA, 2022*), the consideration of alternatives also needs to be cognisant of the fact that "*in some instances some of the alternatives described below will not be applicable - e.g. there may be no relevant 'alternative location'…*"

In accordance with EPA Guidelines (*EPA, 2022*), different types of alternatives may be considered at several key phases during the process. As environmental issues emerge during the preparation of the EIAR, alternative designs may need to be considered early on in the process or alternative mitigation options may need to be considered towards the end of the process.

The EPA Guidelines (EPA, 2022) states:

"*The objective is for the developer to present a representative range of the practicable alternatives considered. The alternatives should be described with 'an indication of the main reasons for selecting the chosen option'. It is generally sufficient to provide a broad description of each main alternative and the key issues associated with each, showing how environmental considerations were taken into account is deciding on the selected option. A detailed assessment (or 'mini-EIA') of each alternative is not required.*"

Thus, the consideration and presentation of the reasonable alternatives studied by the project design team is an important requirement of the EIA process.

2.7.2 Alternative Locations

The Proposed Development is for the construction of a residential development including a childcare facility and a nursing home. The location on which the development is proposed is zoned Z15 in the Dublin City Development Plan 2016 – 2022, which includes childcare facilities as 'Permissible Uses' and residential development as 'Open for Consideration' within the DCDP 2016-2022. A small section of the site is zoned Z9 as this includes lands within St. Anne's Park required to provide for the routing of a surface water discharge from the site via St. Anne's Park to the Naniken River.

Within the Dublin City Development Plan, Z15 lands are identified as lands that have a contribution to make in respect of:

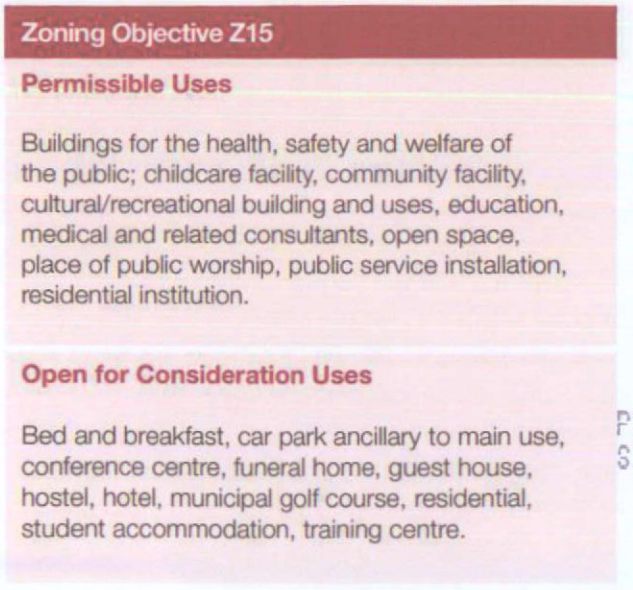
- The Vision for Dublin
- The Core Strategy consistency with National and Regional strategic guidance
- The development plan policies underpin the creation of a compact city with mixed-use environments, sustainable neighbourhoods and green infrastructure, to reduce the city's reliance of fossil fuels and provide for carbon soakage, all in accordance with the National Climate Change Strategy
- Support for an effective Public Transport system
- The Housing Strategy, which identifies Z15 lands as lands incorporating strategic residential use potential

The Housing Strategy identifies a need for 4,217 new housing units per annum in the city during the development plan period, and this demand will be ongoing. The Housing Strategy analysis shows that, other than the Inner City, the city population in the suburbs is falling.

The Dublin City Development Plan 2016 – 2022 and all of its constituent elements have been subject to Strategic Environmental Assessment and Appropriate Assessment, as required, during the plan preparation period. Therefore, as the potential of the lands has been identified in a superior plan, no alternative location for the residential development requires to be considered.

2.7.3 Alternative Uses

The subject lands are zoned Z15, which includes childcare facilities as 'Permissible Uses' and residential development as 'Open for Consideration' within the DCDP 2016-2022. The site of the Proposed Development is located in close proximity to the village cores of both Raheny and Clontarf, which host a range of social infrastructure, in addition to the high-quality public transport provided by both DART and city bus routes. In light of these nearby uses, the Site's zoning, and current demand for high quality residential units, other land uses on site would not be considered appropriate alternatives or would not be in accordance with the planning policy context pertaining to the lands. The Permissible and Open for Consideration Uses for Z15 zoned lands are listed in Figure 2-4 (DCDP 2016-2022).



Zoning Objective Z15

Permissible Uses

Buildings for the health, safety and welfare of the public; childcare facility, community facility, cultural/recreational building and uses, education, medical and related consultants, open space, place of public worship, public service installation, residential institution.

Open for Consideration Uses

Bed and breakfast, car park ancillary to main use, conference centre, funeral home, guest house, hostel, hotel, municipal golf course, residential, student accommodation, training centre.

PLAN NO: LRD6002/22-S3 REC:06/09/2022

Figure 2-4 Permissible and Open for Consideration Uses for Z15 zoned lands (DCDP 2016-2022)

Due to the nature of the current proposal, i.e., the development of residential dwellings and supporting community facilities including a childcare facility and a nursing home, it was not considered necessary to consider alternative uses for the Proposed Development.

2.7.4 Alternative Design & Layouts

The proposals for the subject lands were the subject of detailed discussions with all of the relevant authorities prior to the finalised scheme being prepared, which highlighted the environmental issues to be addressed to inform the design process. These considerations have informed the consideration of alternative layouts and designs, open space provision, addressing the issues of population and human health in a city environment, biodiversity, archaeology, road and access arrangements up to the formalisation of the final scheme which is submitted to Dublin City Council (DCC) for approval.

During the design process for the Proposed Development several iterations of the site layout and alternative designs were considered. The proposed residential development has been prepared in accordance with the requirements of the Dublin City Development Plan 2016-2022 and has been the subject of a number of pre-application meetings with the Planning Authority prior to lodgement. The proposal has also been the subject of a pre-application Large-scale Residential Development (LRD) consultation with DCC, with design alterations arising out of this process also. The key considerations and amendments to the design of the scheme, having regard to and comparing the key environmental issues, are set out and discussed below, including: -

- Design options and changes which were incorporated into the scheme as the proposals progressed through pre-application discussions with the Planning Authority;
- Key design changes arising following the lodgement of the LRD pre-application to DCC;
- Specific section on the alternative bridge design options that were considered in respect of the outfall to the Naniken river as required by the Sanitary Authority and

which resulted in the proposed design option, which provides an acceptable approach in respect to ecology, archaeology and flood risk impacts within St Anne's Park;

- Overview of the scheme submitted for approval.

2.7.4.1 Alternative 1: Withdrawn Application (DCC Ref. 4185/15)

An alternative design approach was used in a previous, withdrawn planning application (DCC Ref. 4185/15). The application is illustrated in Figure 2-5 and included sports facilities along with a large residential development and community facilities. In assessing that application, DCC indicated a preference that DCC would strongly favour a situation where it was evident that the sports facilities primarily serve the institutional/community use and would be retained by the Vincentian Order. For this reason, a separate planning application has been prepared and submitted for all-weather pitches and a sports hall. Environmental issues were also identified by DCC in the assessment of the application, including a potential impact on the integrity of the Natura 2000 network having regard to Brent Geese and a lack of amenity public open space serving the development.

Figure 2-5: Site Layout Plan for planning Reg. Ref. 4185/15 (Reddy Architecture, 2015)

2.7.4.2 Alternative 2: Refused Permission (ABP Ref. 302225-18)

The aforementioned matters were addressed in a following proposal, ABP Ref. 302225-18, which provided 15,965m^2 of public open space compared to 4,534m^2 in the withdrawn scheme. The potential impact on Brent Geese was assessed in the EIAR and the Natura Impact Statement which were submitted with the application. The proposed Landscape Masterplan for the alternative design (BSM Landscape Architects, 2017) is illustrated in Figure 2-6.

Figure 2-6 Landscape Masterplan for alternative design (ABP Ref. 302225-18) (BSM Landscape Architects, 2017)

However, on assessment, ABP was not satisfied that Proposed Development would not have an impact (alone or in combination with other plans and projects) on relevant species of Special Conservation Interest (SCI) or on European Sites within the zone of influence of the Proposed Development. In particular, ABP stated that it could not be satisfied beyond a reasonable scientific doubt that the Light-bellied Brent Geese that would be displaced by the Proposed Development, would successfully relocate to other sites and/or that these sites would represent suitable alternatives to the subject site, which was acknowledged to be of one of eight ex-situ feeding sites of major importance in the Dublin area.

2.7.4.3 Proposed Layout:

In the chosen layout for the Proposed Development, as illustrated in Figure 2-7, the apartment blocks are distributed across a network of streets and spaces, with pedestrian priority and local vehicular access only. Car parking is primarily accommodated at basement level, keeping the grade-level public realm largely free of vehicles. The Proposed Development has been designed to facilitate potential for future public use by incorporating landscaping and public realm improvements, particularly having regard to the extensive communal and public amenity areas, and a significant new public open space pro-vision to the east of the Site.

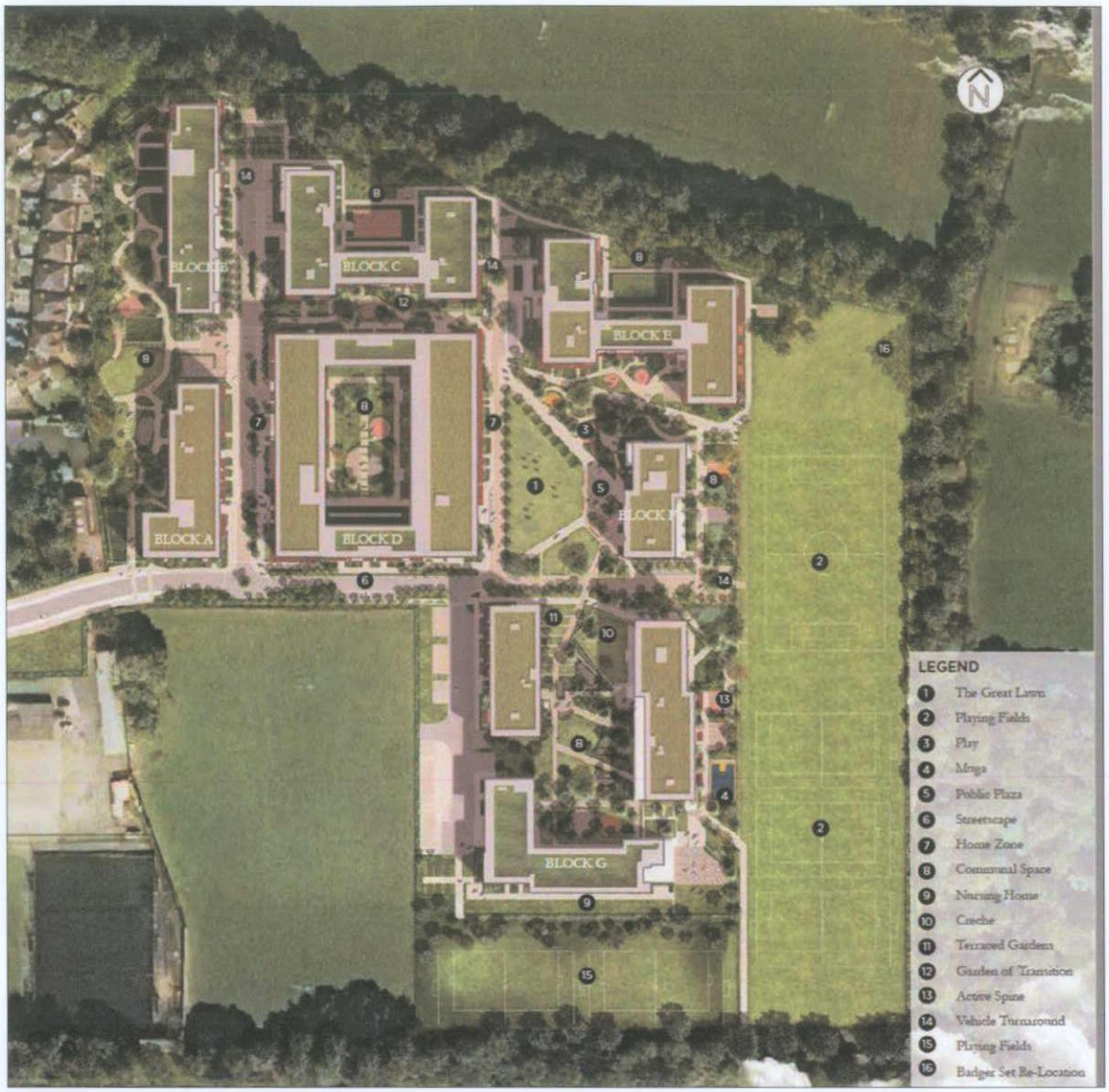


Figure 2-7 Chosen Layout (Source: Landscape Design Statement, August 2022)

The open space for the Proposed Development, which accounts for approximately one third of the site (31.15%), has been planned as a permeable and welcoming piece of public realm, which will enhance the health and wellbeing of local residents and visitors and will create habitable, quality spaces which respond to human comfort. The 'Great Lawn' is a large expanse of open space at the heart of the development which will be open to the public 24/7. A natural play area has been incorporated to the northern 'Forest Gardens'. A number of potential routes through the site of the Proposed Development have been identified to benefit connections with its surroundings and provide a better amenity for the wider community.

In relation to the issues raised by ABP regarding the potential impact of the Proposed Development on relevant species of SCI or on Natura 2000 sites, Enviroguide Consulting undertook a comprehensive suite of wintering bird surveys between 2018 and 2022, and reviewed data provided in Scott Cawley Ltd collected during surveys undertaken between 2012 and 2017, to inform and assist the competent authority in carrying out its Appropriate Assessment, as to whether or not the Proposed Development will adversely affect the integrity

of Natura 2000 sites either alone or in combination with other plans and projects, taking into account the conservation objectives of the Natura 2000 sites (*Enviroguide Consulting, 2022*).

Enviroguide Consulting has determined that the Proposed Development will not adversely affect the integrity of the of Natura 2000 sites either alone or in combination with other plans and projects, considering the conservation objectives of the Natura 2000 sites. Enviroguide Consulting has also determined while an existing foraging resource for other SCI species (i.e., Curlew, Oystercatcher, Black-tailed Godwit and Black-headed Gull) will be lost as a result of the Proposed Development, the results of wintering bird surveys demonstrated that this site is not considered to be of High or Major Importance for any of these species.

It is therefore considered, based on both the numbers and frequency of occurrence of SCI species recorded at the Proposed Development site, that the loss of ex-situ habitat will not impact on the conservation objective attributes of "Distribution" and "Population Trend" of any of the SCI species recorded at the Proposed Development site.

The Natura Impact Statement that accompanies this application details in full the results of the wintering bird surveys and the reasoned opinions of the ecological experts in relation to potential impacts from the Proposed Development on relevant species of SCI or on Natura 2000 sites.

2.7.5 Alternative Process

The location on which the majority of the development is proposed is zoned Z15 in the Dublin City Development Plan 2016 – 2022 (with a small section in zone Z9 to provide for the routing of a surface water discharge from the site via St. Anne's Park to the Naniken River), which zoning includes residential development as 'Open for Consideration' within the associated land use matrix. Due to the nature of the current proposal, i.e., the development of residential dwellings and supporting community facilities including childcare and residential care for the elderly, it was not considered necessary to consider alternative processes for the Proposed Development.

2.8 The Existence of the Project

The Construction Phase will last approximately 18 months. During the Construction Phase of the Proposed Development there will be approximately 300 jobs created, with a maximum of 150 construction workers onsite at any one time at the peak of the construction works. Hence, for the duration of the Construction Phase of the Proposed Development there will be a short-term increase in construction employment in the area, which will have a positive impact, both directly and indirectly, on the local economy.

The primary likely significant environmental impacts of the Proposed Development are fully addressed in the relevant specialist Chapters of this EIAR. These impacts relate to Population & Human Health, Land & Soil, Hydrology and Hydrogeology, Landscape & Visual, Noise, Air Quality & Climate, Traffic, Built Services and Waste Management.

The Operational Phase of the Proposed Development will result in an increase in the population of the area, and it will have a positive impact on the long-term supply needs of housing in the greater Dublin area. The Proposed Development includes a childcare facility and nursing home, which will create employment in the local area and will also provide much

needed care services for children and the elderly. Additionally, the open spaces provided in the Proposed Development will create habitable, quality spaces which will have a positive impact on the health and wellbeing of current and future local residents.

The Proposed Development also has the potential for cumulative, secondary and indirect impacts, which in many instances can be difficult to quantify due to complex inter-relationships. The potential cumulative impacts primarily relate to traffic, dust, noise and other nuisances from the Construction Phase of the Proposed Development, with other planned or existing projects, and each of the technical EIAR chapters has regard to these in the assessment and mitigation measures proposed.

All cumulative, secondary and indirect impacts are unlikely to be significant and have been fully addressed in the relevant specialist Chapters of this EIAR and recapitulated in Chapter 14 (Interactions). 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 and permitted developments adjoining the site of the Proposed Development will be minimal.

3 Planning And Policy Context

The planning and policy context gives an overview of the relevant legislation that supports the Proposed Development at a local, regional and national level and sets out the strategic and statutory context governing the planning and development of the Proposed Development.

Raheny 3 Limited Partnership are applying for permission for development on lands east of St Paul's College, Sybil Hill Road, Raheny, Dublin 5. The site is bound to the north, east and south by St Anne's Park and to the west by residential development at The Meadows, Sybil Hill House (a Protected Structure) and St Paul's College. Vehicular access to the site is from Sybil Hill Road.

The Proposed Development consists of the construction of a residential and nursing home development set out in 7 no. blocks, ranging in height from 4-7 storeys to accommodate 580 no. apartments, residential tenant amenity spaces, a crèche and a 100-bed nursing home. The site will accommodate car parking spaces, bicycle parking spaces, storage, services and plant areas at both basement and podium level.

Landscaping will include extensive communal amenity areas, and a significant public open space provision on the east and south of the site. The proposed application includes all site landscaping works, green roofs, substations, boundary treatments, lighting, servicing, signage, surface water attenuation facilities and associated and ancillary works, including site development works and services above and below ground. For a full description of the Proposed Development please refer to the Statutory Notices.

The Site is located within the administrative area of Dublin City Council (DCC). The Planning and Policy Context Chapter describes how the Proposed Development complies with the stated and statutory requirements of Dublin City Council (DCC) with respect to planning and sustainable development. The relevant local planning policy with which the Proposed Development complies primarily comprises the Dublin City Development Plan 2016 – 2022 and the Draft Dublin City Development Plan 2022-2028. The Proposed Development Site is located on land zoned Z15- Institutional and Community, within the Dublin City Development Plan 2016 – 2022. This is included in the Core Strategy with regards to the availability of land to deliver residential development. A small section of the application site is zoned Z9 as this includes lands within St. Anne's Park required to provide for the routing of a surface water discharge from the site via St. Anne's Park to the Naniken River. No residential development is proposed on the lands contained within the application boundary which are zoned Z9.

Therefore, the Proposed Development is consistent with the policies and zoning objectives outlined in the Dublin City Development Plan 2016 – 2022 and the new Draft Dublin City Development Plan 2022-2028.

The Proposed Development is a Large-scale Residential Development. The definition of Large-scale Residential Development (LRD) is largely similar to Strategic Housing Development (SHD), i.e., developments of 100 housing units or more, or student accommodation developments comprising 200 bed spaces or more, or a combination of same. The two main changes under the new LRD arrangements will allow for:

- Up to 30% of the gross floor space of the Proposed Development to be for other uses, instead of the 15% cap under the SHD arrangements.
- Mixed developments combining housing and student accommodation to be classified as an LRD where the threshold is met for either element.

The new LRD arrangements comprise three stages– pre-application consultation stage, planning application stage and appeal stage. Commencement of the Large-scale Residential Development provisions in the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 (No. 40 of 2021), was signed into law by the President on 14 December 2021.

A formal Large Scale Residential Development (LRD) Pre-Consultation Meeting was held with Dublin City Council on 21st June 2022.

Planning Application Boundary

As Dublin City Council will note from the Application Form and submitted Site Ownership Map, some of the lands within the site boundary include lands outside the applicant's ownership both within the public roadway and on adjacent lands. These lands are within the control of Orsigny CLG and Dublin City Council who have consented to their inclusion (refer to letters of consent which are included with this application).

3.1 National and Regional Planning Policy Context

3.1.1 National Planning Context

3.1.1.1 National Framework Plan

The *Project Ireland 2040: National Planning Framework* (NPF), published on 16th February 2018, replaces the previous National Spatial Strategy. It is the Government's high-level strategic plan for shaping the future growth of the country to the year 2040. It will guide public and private investment and create and promote opportunities for people, and to protect and enhance the environment.

The NPF outlines key future planning and development place-making policies for the Eastern and Midland Regions, including a major new policy emphasis on renewing and developing existing settlements with the target of achieving at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites.

The National Strategic Outcomes as set out in the NPF are:

- Compact Growth;
- Enhanced Regional Accessibility;
- Strengthened Rural Economies and Communities;
- High-Quality International Connectivity;
- Sustainable Mobility;
- A Strong Economy, supported by Enterprise, Innovation and Skills;
- Enhanced Amenities and Heritage;
- Transition to a Low Carbon and Climate Resilient Society;

- Sustainable Management of Water, Waste, and other Environmental Resources; and
- Access to Quality Childcare, Education and Health Services.

The NPF - Project Ireland 2040 requires delivery of a baseline of 25,000 homes annually to 2020, followed by a likely level of 30-35,000 annually up to 2027. To achieve the objective of compact growth, 40% of future housing delivery is to be delivered within and close to the existing built-up areas. Within Dublin, the NPF states that the city needs to '*accommodate a greater proportion of the growth it generates within its metropolitan boundaries and to offer improved housing choice.*'

National Policy **Objective 4** in this regard states:

'*Ensure the creation of attractive, liveable, well designed, high-quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.*'

The Proposed Development supports and assists in achieving the following objectives:

National Policy **Objective 11** in this regard states:

'In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.'

National Policy **Objective 13** in this regard states:

'*In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.*'

The NPF also includes the following objective in relation to social infrastructure needs:

National Policy **Objective 33** states:

Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

As defined in the NPF, ideally, future homes will be located in places that can support sustainable development - places which support growth, innovation and the efficient provision of infrastructure, are accessible to a range of local services, can encourage the use of public transport, walking and cycling, and help tackle climate change.

The Proposed Development supports the policies and goals outlined in the NPF. The Proposed Development is located in an area well served by the necessary infrastructure and is explicitly zoned for uses of this nature.

Further details on how the Proposed Development supports and complies with planning policy and legislation are detailed in the planning report by Brady Shipman Martin (2022) submitted separately as part of this application.

3.1.1.2 Sustainable Urban Housing: Design Standards for New Apartments (2020)

The Design Standards for New Apartments Guidelines were originally issued in 2018, as an update of the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines*, published in 2015. These 2020 Guidelines are issued as a technical update in relation to '*Shared Accommodation/Co-living*'. These Guidelines promote sustainable living patterns with the objective to curb urban sprawl and update previous guidance in the context of greater evidence and knowledge of current and likely future housing demand in Ireland taking account of the Housing Agency National Statement on Housing Demand and Supply, the Government's action programme on housing and homelessness Rebuilding Ireland and Project Ireland 2040 and the National Planning Framework, published since the 2015 guidelines. The apartment design parameters addressed in these Guidelines include the following:

- General locational consideration;
- Apartment mix within apartment schemes;
- Internal space standards for different types of apartments;
- Dual aspect ratios;
- Floor to ceiling height;
- Apartments to stair/lift core ratios;
- Storage spaces;
- Amenity spaces including balconies/patios;
- Car parking; and
- Room dimensions for certain rooms

The Proposed Development has been designed to these current standards. This planning application is accompanied by a Housing Quality Assessment (HQA), prepared by Hawkins Brown Architects, and forms part of the Hawkins Brown Design Statement, which demonstrates the compliance of the Proposed Development with the relevant quantitative standards required under the Apartment Guidelines 2020.

3.1.2 Urban Development and Building Heights Guidelines for Planning Authorities (2018)

The Urban Development and Building Heights – Guidelines for Planning Authorities set out national planning policy guidance on building heights with regard to urban areas. The Guidelines support the strategic policy framework set out in Project Ireland 2040 by strengthening policies for consolidation of existing built-up areas, rather than an unsustainable development pattern whereby many cities and towns continue to grow outwards.

In relation to individual Planning Applications, the Guidelines identify a presumption favouring buildings of increased height in our town/city cores and other urban locations with good public transport accessibility. In addition, the Guidelines set out national planning policy that '*Applies those requirements in setting out relevant planning criteria for considering increased building height in various locations but principally (a) urban and city-centre locations and (b) suburban and wider town locations.*' The Guidelines seek to secure '*…compact and sustainable urban growth'*, which means '*…either reusing or redeveloping existing sites and buildings, in well-serviced urban locations, particularly those served by good public transport and supporting services, including employment opportunities.*'

The Proposed Development will assist in achieving growth within an already built-up commuter area such as Dublin City Centre. In the context of the Proposed Development, this application is considered to meet the criteria of the Guidelines. The Site of the Proposed Development is well served by public transport - '*frequent service and good links to other modes of public transport*' and it is designed '*to integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views*'. The Proposed Development is served by four bus stops within the local area. The nearest bus stops are to the north of the development on the R105 Howth Road. The Proposed Development is also served by the Harmonstown Dart Station and Killester Dart Station. This provides access to several areas in North and South Dublin. It is approximately 800m (c. 10-minutes walking) from the Proposed Development to Harmonstown Dart Station and 950m (c. 12-minutes walking) to Killester Dart Station (Traffic and Transport Assessment, Waterman Moylan Engineering Consultants, 2022).

3.2 Housing for All | A New Housing Plan for Ireland (2021)

Housing for All - a New Housing Plan for Ireland (published in September 2021) is the government's housing policy to 2030. It is a multi-annual, multi-billion-euro plan which will improve Ireland's housing system and deliver more homes of all types for people with different housing needs.

The overall aim of Housing for All is "*Everyone in the State should have access to a home to purchase or rent at an affordable price, built to a high standard and in the right place, offering a high quality of life.*" Housing for All provides four pathways to achieving four overarching objectives:

- *Supporting Homeownership and Increasing Affordability;*
- *Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;*
- *Increasing New Housing Supply; and*
- *Addressing Vacancy and Efficient Use of Existing Stock.*

To meet the targets as set out in the National Planning Framework and the measures discussed in the Housing Plan, Ireland needs an average of 33,000 homes constructed per annum until 2030.

The plan sets out the Government's intention to replace the SHD process with new planning arrangements for large-scale residential developments (LSRD) of 100+ homes (or 200+ student accommodation bed spaces) with a view to maintaining the efficiency of decision-making for developments of this nature, while returning decision-making to the local level and securing associated benefits in terms of public participation. This change in process came into effect from the 17th of December 2021. This Stage 2 Request is now made in line with the requirements of the for Large-Scale Residential Development process (Planning Report, Brady Shipman Martin, 2022).

The Proposed Development will contribute to the number of residential homes being constructed and will assist in achieving the Housing Policy Objectives outlined in the Plan. The Government's *Housing for All Plan* as well as the policies outlined in the National Planning Framework support the delivery of residential development, such as that proposed. The

Proposed Development is located in close proximity to quality public transport routes (the area is well serviced with public transport, including access to rail, buses, and established walking and cycling paths) and within an existing urban area.

3.2.1 Design Manual for Urban Roads & Streets (DMURS) (2013)

The Design Manual for Urban Roads & Streets (DMURS) was prepared by the Department of Transport, Tourism and Sport, together with the Department of Environment, Community and Local Government in 2013 for Urban Roads and Streets and sets out design guidance and standards for urban roads/streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas.

The Traffic and Transport Assessment, prepared by Waterman Moylan Consulting Engineers (2022), provides further detail in respect of the compliance of the Proposed Development with this Design Manual. For example, the Proposed Development will use the existing site access to Sybil Hill House access road. This is to the north of the St. Pauls College entrance. The existing site access road will connect to the Proposed Development. The sightline requirements for a new priority junction on 50kph road are identified within DMURS which recommends a visibility splay of 49m x 2.4m on roads with bus routes. Visibility splay of this junction has been designed in accordance with DMURS requirements. Details of the junction layout can be seen on Waterman Moylan drawings accompanying this planning application. Likewise, all footpaths for the Proposed Development will be provided in accordance with Section 4.3.1 of the DMURS which suggests that a minimum 1.8m footpath should be provided.

3.2.2 National Policy Position on Climate Action & Low Carbon Development and Climate Act 2021

The EU, in 2014, agreed to the "2030 Climate and Energy Policy Framework" (EU 2014). The European Council endorsed an EU target of at least a 40% domestic reduction in greenhouse gas emissions by 2030 compared to 1990. The Paris Agreement was established in 2015 and is an important milestone in international climate change agreements. To meet the Paris Agreement's objectives and assist in reducing Ireland's GHG emissions, the Irish government has established and outlined several policies at a national level.

In 2014, the Government adopted the National Policy Position on Climate Action and Low Carbon Development. The Climate Action and Low Carbon Development Act 2015 was adopted to provide for the approval of plans by the government in relation to climate change. This Act establishes the fundamental national objective of achieving the transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050. It sets out the context for the objective, clarifies the level of greenhouse gas (GHG) mitigation ambition envisaged and establishes the process to pursue and achieve the overall objective. Specifically, the Policy Position envisages that policy development will be guided by a long-term vision based on:

- an aggregate reduction in carbon dioxide (CO2) emissions of at least 80% (compared to 1990 levels) by 2050 across the electricity generation, built environment and transport sectors; and
- in parallel, an approach to carbon neutrality in the agriculture and land-use sector, including forestry, which does not compromise capacity for sustainable food production.

The National Mitigation Plan (DCCAE, 2017) and the National Adaptation Framework (DCCAE, 2018) were also established under this Act.

In addition, on Thursday 4 November 2021, the government launched the Climate Action Plan 2021, an ambitious plan to put Ireland on a more sustainable path, cutting emissions, creating a cleaner, greener economy and society and protecting us from the devastating consequences of climate change.

The Climate Action Plan follows the Climate Act 2021, which commits Ireland to a legally binding target of net-zero greenhouse gas emissions no later than 2050, and a reduction of 51% by 2030. These targets are a key pillar of the Programme for Government. By 2030, the government aims to achieve the following:

- Cutting greenhouse gas emissions by at least 30%
- Reaching a target of at least 32.5% energy efficiency
- Delivering 70% renewable electricity

An Energy Analysis Report has been undertaken by Engineering Design Partnership (August 2022) in order to demonstrate the Proposed Development's compliance to Building Regulations Technical Guidance Document (TGD) Part L 2019. The analysis determined that through the following energy and servicing strategies that an A2/A3 BER should be obtainable:

- Improvements to building thermal transmittance (U-Values), air permeability and thermal bridging with respect to Part L defaults.
- De-Centralised Heating and Hot Water Plant arrangement to each apartment.
- Exhaust Air Heat Pumps (EAHP's) plant delivering all the annual heating and hot water requirement.
- Exhaust Air Heat Pump extracting stale air from apartment creating negative pressure. Passive make-up air from façade providing fresh air to all liveable spaces.
- Photovoltaic (PV) array for electricity generation, centralised to connect to Landlord systems. Minimum required 6/8 no. panels total (330 W peak/ 1.68m2 each) per landlord core allocated at roof level.

Further information is available within the Energy Analysis Report (Engineering Design Partnership, August 2022), and the Building Lifecycle Report (Aramark, 2022) that will be submitted as part of this application.

3.2.2.1 The Planning System & Flood Risk Management (2009)

The Planning System and Flood Risk Management Guidelines were issued under Section 28 of the Planning & Development Act 2000 (as amended). The Planning System and Flood Risk Management Guidelines require the planning system at all levels to avoid development in areas at risk of flooding, particularly floodplains unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere; adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals.

A Site-Specific Flood Risk Assessment (SSFRA) has been prepared in accordance with these guidelines by Waterman Moylan Consulting Engineers Limited (2022) and is included with the

planning application. This assessment identifies the risk of flooding at the site from various sources and sets out possible mitigation measures against the potential risks of flooding. Sources of possible flooding include coastal, fluvial, pluvial (direct heavy rain), groundwater and human/mechanical errors.

3.2.2.2 Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities, 2009 and Urban Design Manual, A Best Practice Guide

The Sustainable Residential Development in Urban Areas guidelines detail the key principles for new residential developments in urban areas while its accompanying Urban Design Manual translates the Guidelines into practice. The Guidelines encourage increased densities in appropriate zoned residential land within inner suburban areas of cities, proximate to existing and due to be improved public transport corridors. These guidelines, together with the accompanying best practice Design Manual, provide a sound basis on which planners, designers and developers can translate ideals of sustainable living into a practical reality. They constitute the new gold standard for sustainable residential development in Ireland.

The Proposed Development is located 5km from Dublin City Centre within the Dublin Metropolitan Area in an area served by the DART Rail (Harmonstown) and the Howth Road Quality Bus Corridor (QBC), which bus routes serve Dublin City Centre. The Proposed Development is adjacent to St Paul's College (Secondary School) and St Anne's Park. As such, it would be categorised as inner suburban / greenfield.

The Proposed Development is a high-quality, sustainable development that achieves the key planning principles and objectives as set out in the County Development Plan.

3.2.2.2.1 Urban Design Manual (A Best Practice Guide) (2009)

The Urban Design Manual was published as a companion document to the Guidelines for Sustainable Residential Development in Urban Areas. The Manual is intended to assist in the assessment of residential applications, to identify the principles and criteria that are important in the design of housing and to set out a design framework for a new residential neighbourhood. These guidelines are also incorporated in the relevant development plan and/or local area plans and outline key considerations in planning application assessments.

The Manual sets out 12 key urban design criteria that all new residential developments should be tested against in order to establish if the scheme is a well-designed proposal, including Context, Connections, Inclusivity, Variety, Efficiency, Distinctiveness, Layout, Public Realm, Adaptability, Privacy / Amenity, Parking and Detailed Design.

It is considered that full cognisance of the Urban Design Manual has been taken by the design team in particular the architects, landscape architects and engineers. Integration of the 12 criteria into the Proposed Development is set out in the Architects Design Statement (Hawkins/ Brown Architects, 2022) and Landscape Design Report (Niall Montgomery + Partners Landscape Architects, in collaboration with collaborate with Hawkins/ Brown Architects, 2022), that will be submitted as part of this planning application.

3.2.2.3 Smarter Travel, A Sustainable Transport Future. A New Transport Policy for Ireland 2009-2020 (2009)

The Smarter Transport objective contained within Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009-2020 outlines the Government vision that the key goals to achieve transport sustainability are:

i) to reduce overall travel demand

ii) to maximise the efficiency of the transport network

iii) to reduce reliance on fossil fuels

iv) to reduce transport emissions and

v) to improve accessibility to transport.

The key targets that the Smarter Travel Policy sets to achieve are:

- Future population and employment growth will predominantly take place in sustainable compact forms, which reduce the need to travel for employment and services
- 500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%
- Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of total commuter journeys to work. The total kilometres travelled by the car fleet in 2020 will not increase significantly from current levels
- A reduction will be achieved on the 2005 figure for greenhouse gas emissions from the transport sector.

The Proposed Development encourages sustainable and smarter travel by providing a high-density development on an underutilised site in close proximity to key employment zones and existing high frequency public transport routes, and through the reduction in car parking and provision of significant cycle facilities (Planning Report, Brady Shipman Martin, 2022).

3.2.2.4 National Investment Framework for Transport in Ireland (NIFTI) December 2021

The National Investment Framework for Transport in Ireland (NIFTI), published on 21 December 2021, sets out clear principles for the consideration of future transport investment and is closely aligned with key Government policy priorities and commitments, such as the Climate Action Plan and the National Development Plan.

The strategic investment priorities articulated by NIFTI have been developed to support the realisation of the NPF and address key transport challenges identified through extensive supporting analysis. The four NIFTI priorities for future land transport investment are:

- Decarbonisation;
- Protection and Renewal;
- Mobility of People and Goods in Urban Areas; and
- Enhanced Regional and Rural Connectivity.

The Proposed Development aligns with the principles as set out by NIFTI. In particular, the Proposed Development assists in achieving one of the key outcomes of the NPF – Compact Growth. NIFTI Investment Priority: Mobility of People and Goods in Urban Areas' outlines

important measures such as '*walking and cycling infrastructure expansion, and the provision of better and more comprehensive public transport services*' in order to tackle spatial constraints and urban congestion issues. The Proposed Development has been designed to encourage sustainable modes of transport such as cycling and walking through the site. The surrounding pedestrian network provides pathways both sides of the road and pedestrian crossings where necessary - Sybil Hill Road has pedestrian pathways separated by grass verges either side of the road, there are also pathways though St. Anne's Park to the West of the Proposed Development.

Along the Howth Road there is no grass verge between the pedestrian pathways and the road. However, there are bus lanes for the majority of the road. There are also several signalised pedestrian crossings available to cross the road.

Surrounding the Proposed Development are several areas of cycle lanes. These cycle lanes are along Howth Road to the North of the development within a combination of Bus Lane and Cycle Lane (within Bus Lane). This cycle lane continues into the city centre and north towards Howth (Traffic and Transport Assessment, Waterman Moylan Consulting Engineers, 2022).

Therefore, due to the strategic location and good public transport available near the Proposed Development site, the Proposed Development will optimise existing transport services and assists in achieving the NFP and Climate Action Plan key policy objectives and commitments.

The Traffic and Transport Assessment further demonstrates the consistency of the Proposed Development with these policy objectives. A Traffic and Transport Assessment has been prepared by Waterman Moylan Consulting Engineers Limited and is submitted with this planning application.

3.2.2.5 Transport Strategy for the Greater Dublin Area 2016 – 2035

As set out in the Planning Report compiled by Brady Shipman Martin (2022), the Transport Strategy for the Greater Dublin Area 2016 – 2035, as prepared by the National Transport Authority, provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA) over the next two decades. It also provides a transport planning policy around which statutory agencies involved in land use planning, environmental protection, and delivery of other infrastructure such as housing, water and power, can align their investment priorities. It is, therefore, an essential component, along with investment programmes in other sectors, for the orderly development of the Greater Dublin Area over the next 20 years.

The Strategy identifies the challenges for transport in the GDA as being:

- An assumed return to sustained economic growth;
- Substantial population growth;
- Full employment;
- That no one is excluded from society, by virtue of the design and layout of transport infrastructure and services or by the cost of public transport use; and
- That the environment in the GDA is protected and enhanced.

It is considered that since the publication of the Strategy in 2016 economic and population growth has continued to substantially increase and as such the objective of the plan are critical to ensuring a functional GDA region.

As such the Proposed Development is consistent with the objectives of the GDA Transport Strategy by providing residential development in proximity to existing employment and public transport networks thereby reducing the requirement of the car and encouraging a shift to more sustainable transport methods (Planning Report, Brady Shipman Martin, 2022).

3.2.3 Regional Planning Context

3.2.3.1 Eastern & Midland Regional Assembly - Regional Spatial & Economic Strategy (RSES) (2019)

The Eastern & Midland Regional Assembly (EMRA) Regional Spatial & Economic Strategy 2019-2031 (hereafter RSES) was adopted in 2019 to ensure the policies and objectives of the NPF are implemented at a regional level.

The Strategy identifies that the Region '*is home to over 800,000 households, with 4 out of 5 living in conventional housing while apartments account for around 18% of our housing stock. One of the challenges facing the Region is the continued growth rates of household formation coupled with a severe slowdown in the development of new housing stock during the economic recession, resulting in housing supply and affordability pressures in both sale and rental markets, particularly in Dublin and urban areas but affecting all of the Region'*.

The RSES sets out an ambitious target to achieve compact growth with 50% of housing to be provided within or contiguous to the built-up area of Dublin city and suburbs. Policy objectives in relation to the Proposed Development and Housing Delivery include:

RPO 4.3: to "*...support the consolidation and reintensification of infill / brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin city and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.*"

RPO 5.4: "*Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for New Apartments' Guidelines, and Draft 'Urban Development and Building Heights Guidelines for Planning Authorities.*"

RPO 5.5: "*Future residential development in the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, supported by the development of Key Metropolitan Towns in a sequential manner as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES.*"

The Proposed Development will contribute to the target to achieve compact growth with 50% of housing to be provided within or contiguous to the built-up area of Dublin City and suburbs.

The Proposed Development has been designed in accordance with the above guidelines, objectives of the NPF and the RSES EMRA, and as set out in the Planning Report compiled by Brady Shipman Martin (2022), "*this application enables the consolidation of a strategically located site within the urban envelope northeast of Dublin City centre.*"

3.2.4 Local Level

3.2.4.1 Dublin City Council Development Plan 2016-2022

The Dublin City Council Development Plan is the statutory planning policy document for the City. It sets out the policies and objectives for the proper planning and sustainable development of the City from 2016 to 2022. The Dublin City Development Plan 2022-2028 is also currently available in Draft format and has been consulted in relation to the Proposed Development. The public consultation period for this Draft Plan ended on 14th February 2022.

The Dublin City Development Plan is the statutory planning policy document pertaining to the Proposed Development on lands to the east of St. Pauls College, Sybil Hill Road, Raheny, Dublin 5. It sets out policies and objectives to guide how and where development will take place in the city over the lifetime of the Plan.

3.2.4.1.1 Requirements for Development of Lands Zoned Z15

The majority of the application site, (including the adjoining St Paul's College and the Vincentian Order in Sybil Hill House), is zoned objective Z15 in the Dublin City Development Plan 2016-2022. This Zoning Objective is "*To protect and provide for institutional and community uses*". Under the zoning objective, the proposed residential use is Open for Consideration.

A small section of the site to the northeast, is zoned Z9. This Zoning Objective is "*To preserve, provide and improve recreational amenity and open space and green networks*." No residential development is proposed on the lands contained within the application boundary which are zoned Z9.

As set out in the Dublin City Development Plan 2016-2022, where there is an existing institutional and/or community use, any Proposed Development for 'open for consideration' uses on part of the landholding, will be required to demonstrate to the planning authority how the proposal is in accordance with and assists in securing the aims of the zoning objective; how it secures the retention of the main institutional and community uses on the lands, including space for any necessary expansion of such uses; how it secures the retention of existing functional open space e.g. school playing fields; and the manner in which the nature and scale of the proposal integrates with the surrounding lands. A masterplan may assist in demonstrating how the requirements of this paragraph may be satisfied.

A Masterplan entitled "*Masterplan Approach for Redevelopment*" by Hawkins Brown is included with this application and addresses the provisions of the Z15 Zoning Objective. The Masterplan relates to all of the lands in the original St Paul's College campus that are subject to the Z15 zoning.

The Masterplan represents the intentions of the main institutional stakeholder of the lands, working in co-operation with the other landowners within the subject Z15 area and with Dublin City Council to deliver a vision for the integrated and sustainable development of the lands, while retaining the main institutional use in an enhanced condition and setting. The Institutional Owners confirm that the main institutional, educational, and community uses on the lands, including space for any necessary expansion of such uses will be maintained and improved in the future by Orsigny/The Vincentian Order.