ARMSTRONG FENTON ASSOCIATES

PROJECT: Large-scale Residential Development (LRD)

Environmental Impact Assessment Report - Volume II

Proposed Large-scale Residential Development (LRD) in the townlands of Bohernabreena, Oldcourt & Killininny, Dublin 24.

CLIENT: Capami Ltd

DATE: September 2024.

Planning & Development Consultants

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PART A - Introduction and Background

1.0. Introduction

1.1 Introduction

1.1.1. This Environment Impact Assessment Report (hereafter EIAR) has been prepared by Armstrong Fenton Associates Planning Consultants on behalf of Capami Ltd. who intends to apply to South Dublin County Council (hereafter "SDCC") for a Large-scale Residential Development on lands in the townlands of Bohernabreena, Oldcourt, and Killininny, Dublin 24. The proposed development falls under the definition of Large-scale Residential Development (hereafter "LRD") as set out under Section 2 of the Planning and Development (Amendment) (Large-scale Residential Development) Act, 2021, as it consists of "the development 100 or more houses" the floor space of which "is not less than 70 per cent, or such other percentage as may be prescribed, of the LRD floor space of the buildings comprising the development". This chapter of the EIAR was prepared by Tracy Armstrong, BA, MRUP, MRTPI, MIPI, of Armstrong Fenton Associates Planning Consultants. A full list of the competent experts who were involved in the preparation of this EIAR, along with their experience and qualifications, is included in Table 1.2.

1.1.2. The application site comprises c. 20.4 hectares located on lands that are located in the townlands of Bohernabreena, Oldcourt and Killininny, Dublin 24. The subject site is located to the east of Bohernabreena Road (L7114) and north and east of Bohernabreena cemetery, south/south-east of St. Anne's GAA club, south of the Dodderbrook residential estate, west of the Ballycullen Gate residential development (currently under construction under Planning Ref.s SD17A/0468 & SD22A/0356) and west of Oldcourt Road (R113).

1.1.3. The application site also lies within the boundary of the Ballycullen-Oldcourt Local Area Plan (2014, as extended) lands (hereafter "Plan lands") which stretch across the foothills of the Dublin mountains, forming a buffer between the mountains and the existing suburban areas of Tallaght, Firhouse and Knocklyon. The Plan lands are bounded to the west by Bohernabreena Road, to the east by the M50, to the north by existing suburban development, including for the Allerton, Ely, Beechdale, Hunters Wood, Woodstown, and Dalriada estates, and to the south by the foothills of the Dublin mountains. With their mountainous backdrop, the Plan lands are generally semi-rural in setting; however, they also benefit from views of the suburban and urban hinterland. The prevailing development in the immediate vicinity is generally comprised of two and three storey housing.

1.1.4 In the above context, this EIAR is undertaken against a background of a significant amount of environmental information and assessment which informed the preparation of the LAP and the current South Dublin County Development Plan 2022-2028, and their approval by SDCC.

1.1.5 The EIA process, including the preparation of this EIAR and the examination of the information presented by SDCC, will inform the decision-making process. The purpose of this EIAR is to assist and inform SDCC, as the competent authority, in undertaking an environmental assessment of this project.

Therefore, the objectives of this EIAR are summarised as follows:

- To identify the significant environmental impacts of the proposed development during the construction and operational phases having regard to the characteristics of the receiving environment.

- To evaluate the magnitude and significance of these impacts and propose appropriate measures to mitigate potential adverse impacts.

- To identify, where appropriate, monitoring measures to be implemented during the construction and operational phases.

The nature and extent of the development being assessed is outlined in Chapter 3 of this EIAR and summarised in Section 1.2. This EIAR is prepared with reference to the plans and particulars submitted with the planning application.

1.2. Proposed Development

1.2.1 Capami Ltd is are applying to SDCC for permission for a Large-scale Residential Development (LRD) at a site located in the townlands of Bohernabreena, Oldcourt and Killininny, Dublin 24. The subject site is located to the east of Bohernabreena Road (L7114) and east of Bohernabreena cemetery, south/south-east of St. Anne's GAA club, south of the Dodderbrook residential estate, west of the Ballycullen Gate residential development (currently under construction under Planning Ref.s SD17A/0468 & SD22A/0356) and west of Oldcourt Road (the R113).

1.2.2 The aforementioned Dodderbrook and Ballycullen Gate developments have been / are being successfully delivered respectively by the applicant. In addition, the applicant has permission for the development of 21 no. residential units located to the west of Dodderbrook (granted permission under South Dublin County Council Ref. SD19A/0104 / An Bord Pleanála Ref. ABP-305800-19) which has recently commenced construction. Permission has also been granted for the development of 71 no. units to the immediate west of the subject site under Ref. SD23A/0083. Further east of the subject site is the Ballycullen Green residential estate and the Gunny Hill playing pitches, which have also been delivered by the applicant in recent years.

1.2.3 The site is, in the majority, a greenfield site, having only ever been used for agricultural purposes. In the south-west part of the site are 2 no. dwellings and a number of outbuildings / sheds that are all proposed to be demolished.

1.2.4 The subject site generally falls from south to north, with a high point of the southern boundary of Approximately 119.78m OD Malin. The lowest point along the northern boundary is approximately 98.12m OD Malin where the site connects into an existing ditch. The ground level rises steeply from north to south - there is a difference of approximately 21.0m in elevation between the north and south. The ground level continues this steep gradient south of the Site. The ground level falls away north of the site but at a shallower gradient.

1.2.5 The proposed development consists of 523 no. residential units comprised of 255 no. 2, 3 & 4 bed, 2 & 3 storey, detached, semi-detached and terraced houses, 206 no. 1, 2 & 3 bed duplex units in 20 no. 2 & 3 storey blocks, and 62 no. 1, 2 & 3 bed apartments in 4 no. 2-3 & 3-4 storey blocks, along with a 2 storey childcare facility of c. 457sq.m. Private amenity space for the residential units is provided in the form of rear gardens for houses and ground floor terraces / upper floor balconies for apartments and duplex units. The proposed development provides for a total of c. 7.37Ha of public open space, and c. 5,545sq.m of communal open space associated with proposed residential units.

1.2.6 Vehicular access to the development will be via 4 no. access points, as follows: (i) from the west of the site via 2 no. accesses located off Bohernabreena Road, (ii) from the north of the site via 1 no. access at Dodderbrook Place, and (iii) from Oldcourt Road (the R113) to the east, via adjoining residential development at Ballycullen Gate. The proposed development includes for pedestrian and cyclist connections and accesses throughout the proposed development and to adjoining lands to the north at Dodderbrook Avenue and to the north-west into St. Anne's GAA club.

1.2.7 The proposed development includes the demolition of all existing structures on site, including 2 no. single storey dwellings and outbuildings/sheds (total demolition area: c. 4,152.06m²). The proposed development provides for (i) all associated site development works above and below ground, including 2 no. underground foul sewerage pumping stations, (ii) public open spaces (c. 7.37Ha), (iii) communal open spaces (c. 5,545sq.m), (iv) hard and soft landscaping and boundary treatments, (v) surface car parking (700 no. car parking spaces, including EV parking), (vi) bicycle parking (1,267 no. bicycle parking spaces), (vii) bin & bicycle storage, (viii) public lighting, and (ix), plant / PV panels (M&E), utility services & 5 no. ESB sub-station/kiosks, all on an overall application site area of c.20.4Ha.

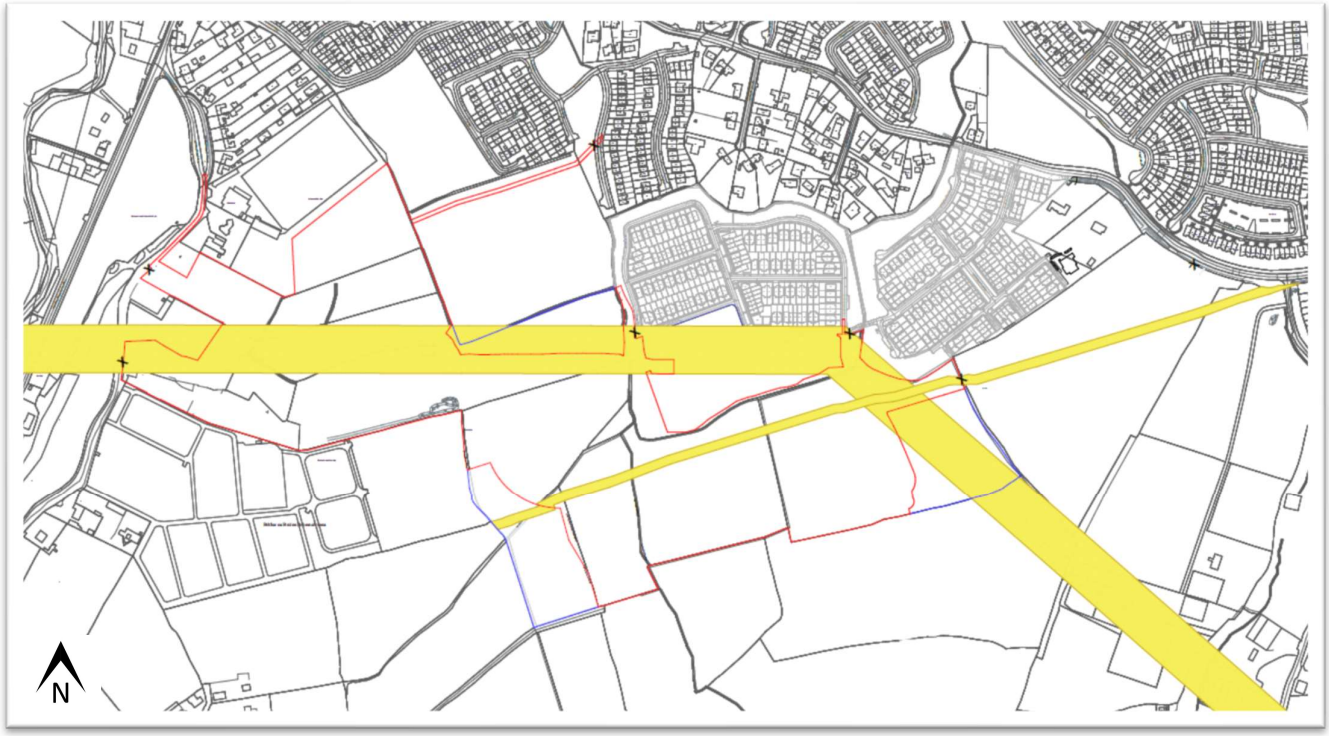

Fig. 1.1 – Site Location Map

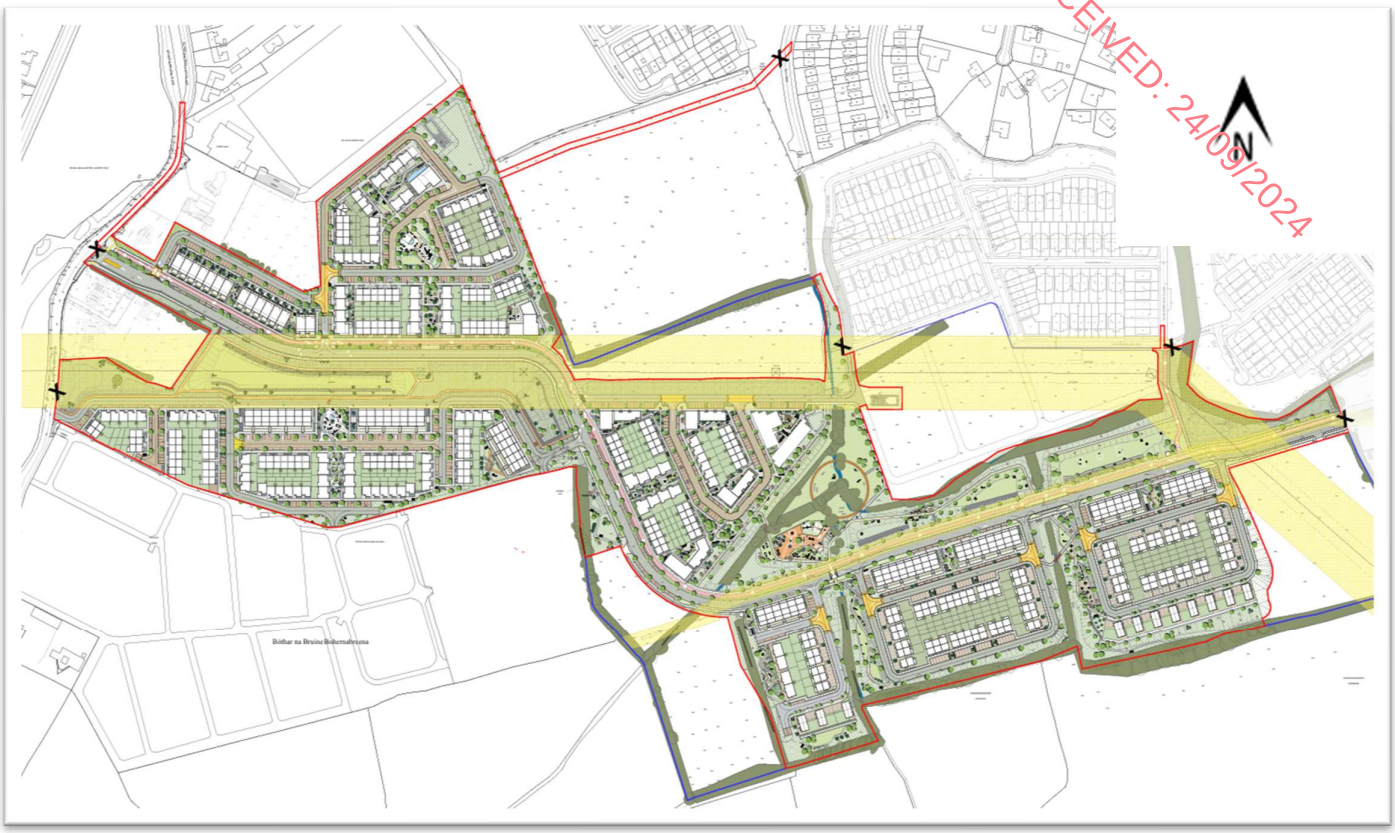

Fig. 1.2 – Proposed Site Layout Plan

1.3. Definition of EIA and EIAR

1.3.1. Directive 2011/92/EU of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment, as amended by Directive 2014/52/EU (hereafter the "EIA Directive") defines *'environmental impact assessment'* as a process which includes the responsibility of the developer to prepare an EIAR and the responsibility of the competent authority to provide reasoned conclusions following the examination of the EIAR and other relevant information.

1.3.2. Article 1(2)(g) 4 of the EIA Directive states that "environmental impact assessment" means a process consisting of:

"(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 content of an EIAR is included in Article 5(1) and expanded upon in Annex IV (See Box 1.1):

"Article 5

1. Where an environmental impact assessment is required, the developer shall prepare and submit an environmental impact assessment report. The information to be provided by the developer shall include at least:

(a) a description of the project comprising information on the site, design, size and other relevant features of the project;

(b) a description of the likely significant effects of the project on the environment;

(c) a description of the features of the project and/or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;

(d) a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment;

(e) a non-technical summary of the information referred to in points (a) to (d); and

(f) any additional information specified in Annex IV relevant to the specific characteristics of a particular project or type of project and to the environmental features likely to be affected."

BOX 1.1 ANNEX IV: DIRECTIVE 2011/92/EU AS AMENDED BY DIRECTIVE 2014/52/EU

INFORMATION REFERRED TO IN ARTICLE 5(1)
(INFORMATION FOR THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT)

1. A Description of the project, including in particular:
(a) a description of the location of the project;
(b) a description of the physical characteristics of the whole project, including, where relevant, requisite demolition works, and the land-use requirements during the construction and operational phases;
(c) a description of the main characteristics of the operational phase of the project (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used;
(d) an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases.

2. 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 project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.

3. A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the project as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.

4. A description of the factors specified in Article 3(1) likely to be significantly affected by the project: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.

5. A description of the likely significant effects of the project on the environment resulting from, inter alia:
(a) the construction and existence of the project, including, where relevant, demolition works;
(b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;
(c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;
(d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);
(e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;
(f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;
(g) the technologies and the substances used.
The description of the likely significant effects on the factors specified in Article 3(1) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short term, medium term and long term

7. A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.

8. A description of the expected significant adverse effects of the project on the environment deriving from the vulnerability of the project to risks of major accidents and/or disasters which are relevant to the project concerned. Relevant information available and obtained through risk assessments pursuant to Union legislation such as Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or relevant assessments carried out pursuant to national legislation may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.

9. A non-technical summary of the information provided under points 1 to 8.

1.3.3. A definition of EIAR has not been included in the revised directive, however, the Draft EPA Guidelines (2017) provide the following definition:

"A statement of the effects, if any, which proposed development, if carried out, would have on the environment.

The EIAR is prepared by the developer and is submitted to a CA (Competent Authority) as part of a consent process. The CA uses the information provided to assess the environmental effects of the project and, in the context of other considerations, to help determine if consent should be granted. The information in the EIAR is also used by other parties to evaluate the acceptability of the project and its effects and to inform their submissions to the CA.

The EIAR consists of a systematic analysis and assessment of the potential effects of a proposed project on the receiving environment. The amended EIA Directive prescribes a range of environmental factors which are used to organise descriptions of the environment and these factors must be addressed in the EIAR.

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".

1.3.4. In summary, EIA is a process for anticipating the effects on the environment caused by development. An EIAR is the document produced as a result of that process and provides information which the competent authority uses in deciding whether or not to grant consent. Where potential environmental effects are identified that are likely, significant and adverse; the EIA process aims to quantify and minimise the impact specified development projects have on the environment through appropriate mitigation measures. The preparation of an EIAR document requires site-specific considerations and the preparation of baseline assessment against which the likely impacts of a proposed development can be assessed by way of a concise, standardised and systematic methodology.

1.4. EIA Legislation

1.4.1. The EIA Directive is transposed into Irish law through a number of statutory instruments. Of these, the most relevant for this project are Part X of the Planning and Development Act 2000, as amended and the Planning and Development Regulations 2001, as amended.

1.4.2. The following guidance has informed the preparation of this EIAR:

- the Draft EPA Guidelines, referenced above;
- the European Commission's Guidance on the preparation of the EIAR (2017); and
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment" (2018).

1.5. EIA Guidelines

1.5.1. EIA practice has evolved substantially since the introduction of the EIA Directive in 1985. Practice continues to evolve and takes into account the growing body of experience in carrying out EIAs in the development sector. The relevant key EIA Guidance which has been consulted in the preparation of this EIAR document is detailed below. In addition, the individual chapters of this EIAR should be referred to for further information on the documents consulted by each individual consultant.

The following is a list of the EIA Guidelines consulted as part of the preparation of this EIAR:

Irish Guidance

- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, August 2018.
- Guidelines on the information to be contained in environmental impact assessment reports, EPA, May 2022.
- Transposition of 2014 EIA Directive (2014/52/EU) in the Land Use Planning and EPA Licencing Systems.
- Key Issues Consultation Paper, Department of Environment, Community and Local Government, 2017.
- Circular letter PL 1/2017 - Advice on Administrative Provisions in Advance of Transposition (2017).
- Development Management Guidelines (DoEHLG, 2007).
- Advice Notes on Current Practice (in preparation of Environmental Impact Statements) (EPA 2003).
- Environmental Impact Assessment (EIA), Guidance for Consent Authorities Regarding Sub-Threshold Development (DoEHLG 2003).

European Union / European Commission Guidance (in addition to Directives referenced above)

- Environmental Impact Assessment of Projects – Guidance on the Preparation of the Environmental Impact Assessment Report (2017).
- Environmental Impact Assessment of Projects – Guidance on Screening (2017).
- Environmental Impact Assessment of Projects – Guidance on Scoping (2017).
- Study on the Assessment of Indirect & Cumulative Impacts as well as Impact Interaction (DG Environment 2002).
- EU Guidance on EIA Screening (DG Environment 2001).
- Guidance on EIA Scoping (DG Environment 2001).
- EIA Review Checklist (DG Environment 2001).

The most recent guidelines are the August 2018 EIA Guidelines for Planning Authorities and An Bord Pleanála, which replace previous Guidelines for Planning Authorities and An Bord Pleanála on carrying out environmental impact assessment published in March 2013, and the May 2022 Guidelines on the information to be contained in environmental impact assessment reports, published by the Environmental Protection Agency (EPA).

1.5.2. The 2022 EPA guidelines were prepared to assist practitioners in interpreting the amended EIA Directive 2014/92/EU. The Guidelines have been drafted with the primary objective of improving the quality of EIARs with a view to facilitating compliance with the Directive. By doing so they contribute to a high level of protection for the environment through better informed decision-making processes.

1.5.3. The Guidelines were made available in draft format following the transposition deadline of 16 May 2017 set down in Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (EIA Directive). The Guidelines have been updated following the introduction of transposing legislation and are now formally adopted and published by the Environmental Protection Agency in May 2022.

1.6. The EIA Process

1.6.1. The main purpose of the EIA process is to identify the likely significant impacts on the human environment, the natural environment and on cultural heritage associated with the proposed development, and to determine how to eliminate or minimise these impacts. The EIAR summarises the environmental information collected during the impact assessment of the proposed development.

Several interacting steps typify the early stages of the EIA process and include:

- Screening
- Scoping
- Assessing Alternatives and
- Assessing and Evaluating

Screening: Screening is the term used to describe the process for determining whether a proposed development requires an EIA.
Scoping: This stage firstly identifies the extent of the proposed development and associated site, which will be assessed as part of the EIA process, and secondly, it identifies the environmental issues likely to be important during the course of completing the EIA process through consultation with statutory and non-statutory stakeholders.

Assessing Alternatives: This stage outlines the possible alternative approaches to the proposed development. Consideration of alternative sites and layouts within the final chosen site are set out in Chapter 3 of this EIAR.

Assessing and Evaluating: The central steps of the EIA process include baseline assessment (desk study and field surveys) to determine the status of the existing environment, impact prediction and evaluation, and determining appropriate mitigation measures where necessary.

1.7. Screening

1.7.1. 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 by reference to the type and scale of the proposed development and the significance or the environmental sensitivity of the receiving baseline environment.

Annex I of the EIA Directive 85/337/EC requires as mandatory the preparation of an EIA for all development projects listed therein. Schedule 5 (Part 1) of the Planning & Development Regulations 2001 (as amended) transposes Annex 1 of the EIA Directive directly into Irish land use planning legislation. The Directive prescribes mandatory thresholds in respect to Annex 1 projects.

Annex II of the EIA Directive provides EU Member States discretion in determining the need for an EIA on a case-by-case basis for certain classes of project having regard to the overriding consideration that projects likely to have significant effects on the environment should be subject to EIA.

Schedule 5 (Part 2) of the Planning & Development Regulations 2001 (as amended) set mandatory thresholds for each project class. Sub-section 10(b) (iii) and (iv) addresses *'Infrastructure Projects'* and requires that the following class of project be subject to EIA:

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

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

This proposed Large-scale Residential Development comprises of *inter alia* the provision of 523 no. residential units, creche, open space, and associated infrastructure on an overall site area of c. 20.4 hectares.

An EIA is therefore mandatory, as the proposed LRD development at Oldcourt includes provision of 523 no. dwellings, exceeding the threshold of 500 dwelling units.

1.8. Scoping

1.8.1. The 2017 EPA Guidelines state that *'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 stated in the European Commission guidance[1] that: *'The Directive provides that Developers may request a Scoping Opinion from the Competent Authority which identifies the content and the extent of the assessment and specifies the information to be included in the EIA Report."*

1.8.2. The applicant is committed to ensuring that all their development is conducted in a responsible and sustainable manner. An informal scoping process to identify the issues that are likely to be most important during the EIA process was carried out by the applicant, design team and EIAR consultants and informed the format of this EIAR.

1.9. Environmental Factors

1.9.1 The EIAR prepared for the subject application has endeavoured to be as thorough as possible and therefore the provisions included in the revised EIA Directive and all of the issues listed in Schedule 6, Sections 1, 2 and 3 of the Planning and Development Regulations 2001 (as amended) and in recent guidance documents have been addressed in the EIAR. In this context the following topics/issues have been reviewed and addressed in the context of the proposed development:

- Introduction,
- Planning Context,
- Project Description and Alternatives Examined,
- Population and Human Health,
- Archaeology and Cultural Heritage,
- Biodiversity,
- Landscape and Visual Impact,
- Land and Soils,
- Water,
- Air Quality,
- Climate,
- Noise and Vibration,
- Material Assets,
- Interactions,
- Principle Mitigation and Monitoring Measures,
- Non-Technical Summary.

1.9.2 In addition to the above, a series of standalone reports have been prepared to accompany the planning application, i.e., Pinnacle Consulting Engineers have prepared a Traffic and Transport Assessment Report, a Travel Plan, an Outline Construction Traffic Management Plan, an Engineering Assessment Report, Kilgallen & Partners Consulting Engineers have prepared a Site Specific Flood Risk Assessment. Enviroguide Consulting has prepared an Appropriate Assessment Screening Report and a a Natura Impact Statement (NIS), AWN has prepared Hydrological & Hydrogeological Qualitative Risk Assessment. Armstrong Fenton Associates have prepared *inter alia* a Planning Statement, a Building Life Cycle Report and a Social and Community Infrastructure Assessment, while the enclosed Resource and Waste Management Plan and Operational Waste Management Plan (refer to Appendices to Chapter 13

[1] Guidance on EIA Scoping, EC, 2017

of this EIAR) has been prepared by AWN Consulting Ltd. These reports have helped inform the chapters of the EIAR where relevant and are submitted as separate documents also.

1.9.3 It is necessary to examine each section of this EIAR with respect to the impacts that the proposed development may have on the environment. The purpose of this scoping exercise is to shape and mould the EIAR so as not to dismiss any potential impacts that may in fact be significant, and to focus on issues which need to be resolved.

1.9.4 The scope of this EIAR has, in particular, been informed by the following:

- European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, August 2018.
- Guidelines on the information to be contained in environmental impact assessment reports (EPA, 2012).
- Environmental Impact Assessment of Projects – Guidance on the Preparation of the Environmental Impact Assessment Report (EC, 2017).
- Transposition of 2014 EIA Directive (2014/52/EU) in the Land Use Planning and EPA Licencing Systems Key Issues Consultation Paper, Department of Environment, Community and Local Government, 2017.
- Circular letter PL 1/2017 - Advice on Administrative Provisions in Advance of Transposition (2017).
- The requirements of Part X of the Planning and Development Act, 2000, as amended, and Part 10 of the Planning & Development Regulations, 2001-2018.
- The requirements of the South Dublin County Development Plan 2022-2028 and the Ballycullen – Oldcourt Local Area Plan 2014.
- National and Regional Planning Policy Documents.
- The likely concerns of third parties.
- The nature, location and scale of the proposal.
- The existing environment together with any vulnerable or sensitive local features and current uses.
- The planning history and environmental assessments associated with the subject site and adjoining lands.
- The likely and significant impacts of the proposed development on the environment.
- Available methods of reducing or eliminating undesirable impacts.

1.9.5 Prior to the submission of this LRD planning application to SDCC, numerous meetings took place between the applicant and the technical staff of SDCC. Two no. pre-application consultations also took place between the Applicant and the Planning Authority under the LRD process which assisted in the preparation of this EIAR and planning application.

1.9.6 The content of this EIAR has been prepared in accordance with the provisions of Article 5(1) and the EIA Directive 2014/52/EU. Article 5(1) states:

"The information to be provided by the developer shall include at least:

(a) a description of the project comprising information on the site, design, size and other relevant features of the project;

(b) a description of the likely significant effects of the project on the environment;

(c) a description of the features of the project and/or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;

(d) a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment;

(e) a non-technical summary of the information referred to in points (a) to (d); and

(f) any additional information specified in Annex IV relevant to the specific characteristics of a particular project or type of project and to the environmental features likely to be affected."

Annex IV states:-

"1. A Description of the project, including in particular:

(a) a description of the location of the project;

(b) a description of the physical characteristics of the whole project, including, where relevant, requisite demolition works, and the land-use requirements during the construction and operational phases;

(c) a description of the main characteristics of the operational phase of the project (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used;

(d) an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation) and quantities and types of waste produced during the construction and operation phases.

2. 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 project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.

3. A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the project as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.

4. A description of the factors specified in Article 3(1) likely to be significantly affected by the

project: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.

5. A description of the likely significant effects of the project on the environment resulting from, inter alia:

(a) the construction and existence of the project, including, where relevant, demolition works;

(b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;

(c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;

(d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);

(e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;

(f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;

(g) the technologies and the substances used.

The description of the likely significant effects on the factors specified in Article 3(1) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the project. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project.

6. A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

7. A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.

8. A description of the expected significant adverse effects of the project on the environment deriving from the vulnerability of the project to risks of major accidents and/or disasters which are relevant to the project concerned. Relevant information available and obtained through risk assessments pursuant to Union legislation such as Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or relevant assessments

carried out pursuant to national legislation may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.

9. A non-technical summary of the information provided under points 1 to 8.

10. A reference list detailing the sources used for the descriptions and assessments included in the report."

1.10. Purpose of the EIAR

1.10.1. The objective of the EIAR is to:

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

As provided for in the EPA 2022 guidelines, the EIAR focuses on:

- Impacts that are both likely and significant;
- Impact descriptions that are accurate and credible.

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

The definition of Environmental Impact Assessment is clarified within Article 1(2)(g) the amended (2014) EIA Directive and is as follows:

"'Environmental impact assessment' means a process consisting of:

(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".

1.10.3 Under Article 5(3) of the 2014 Directive, it is specifically required that the developer must ensure that the environmental impact assessment report is prepared by competent experts. Each chapter of this EIAR has been prepared by experts with the requisite qualifications and competences which are detailed in each relevant chapter.

1.10.4 The intention of this EIAR document is to provide transparent, objective and replicable documentary evidence of the EIA evaluation and decision-making processes which led to the selection of the final project configuration. The EIAR documents the consideration of environmental effects that influenced the evaluation of alternatives. It also documents how the selected project design incorporates mitigation measures; including impact avoidance, reduction or amelioration; to explain how significant adverse effects will be avoided.

1.11. Objectives of this EIAR

1.11.1 The EPA guidelines list the following fundamental principles to be followed when preparing an EIAR:

- Anticipating, avoiding and reducing significant effects
- Assessing and mitigating effects
- Maintaining objectivity
- Ensuring clarity and quality
- Providing relevant information to decision makers
- Facilitating better consultation

1.11.2. This EIAR document describes the outcomes of the iterative EIA process which was progressed in parallel with the project design process. This forms the first part of the EIA process which will be completed by 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 under Section 171A of the Planning and Development Act 2000, (as amended).

1.11.3. The amended EIA Directive prescribes a range of environmental factors which are used to organise descriptions of the environment and the environmental impact assessment should identify, describe and assess in an appropriate manner, in the light of each individual case, the direct and indirect significant effects of a project on the prescribed environmental factors which are:

(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
(c) land, soil, water, air and climate
(d) material assets, cultural heritage and the landscape
(e) the interaction between the factors referred to in points (a) to (d)

This EIAR documents the assessment process of the prescribed environmental factors in relation to the proposed LRD on lands at Oldcourt, Dublin 24.

1.11.4. The EIA process was based on the following four key objectives:

i. Pursuing Preventative Action
ii. Maintaining Environmental Focus and Scope
iii. Informing the Decision
iv. Public & Stakeholder Participation

i. Pursuing Preventative Action

Pursuing preventative action is the most effective means by which potential negative environmental impacts can be avoided. An assessment of anticipated likely and significant impacts was undertaken during the screening, informal scoping and the considerations of alternatives stages of the EIA process. This involved forming a preliminary opinion, in the absence of complete data, with respect to the approximate magnitude and character of the likely environmental impacts. This assessment was based on the knowledge, experience and expertise of the EIA and project design team with reference to the amended EIA Directive, EIA guidance material and local precedents.

Avoidance of impacts has been principally achieved through the consideration of alternatives and through the review of the project design in light of identified key environmental constraints. This is outlined in greater detail in Chapter 3.

ii. Maintain Environmental Scope and Focus

It is important that the EIAR document remains tightly focussed. This minimises expenses, delays and the potential for a confusing mass of data to obscure relevant facts. The EIA process has been project-managed and steered, so as to ensure that the EIAR documentation and analysis are confined to those topics and issues which are explicitly described in the legislation, and where environmental impacts may arise. Evaluation and analysis has been limited to topics where the indirect, secondary or cumulative impacts are either wholly or dominantly due to the project or development under consideration and remain focused on issues that:

- Are environmentally based
- Are likely to occur
- Have significant and adverse effects

iii. Informing the Decision

The EIAR document enables the competent/consenting authorities to reach a decision on the acceptability of the proposed development in the full knowledge of the project's likely significant impacts on the environment, if any.

iv. Public & Stakeholder Participation

Decisions are taken by competent/consent authorities through the statutory planning process which allows for public participation and consultation while receiving advice from other key stakeholders and statutory authorities with specific environmental responsibilities.

Public participation and consultation are an integral part of the LRD process as outlined in the Planning and Development Act, 2000 (as amended), (the Planning and Development (Amendment) (Large-scale Residential Development) Act, 202) and the Planning and Development Regulations 2001 (as amended).

The structure, presentation and the non-technical summary of the EIAR document, 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 projects prior to the granting of consent.

Informal scoping of potential environmental impacts was undertaken with the Planning Authority through pre application consultation meetings. Direct and formal public participation in the EIA process will be through the statutory planning application process under the LRD procedures.

1.11.5. To summarise, it is the intention of this EIAR document is to provide transparent, objective and replicable documentary evidence of the EIA evaluation and decision-making processes which led to the selection of the final project configuration. The EIAR documents the consideration of environmental effects that influenced the evaluation of alternatives. It also documents how the selected project design incorporates mitigation measures; including impact avoidance, reduction or amelioration; to explain how significant adverse effects will be avoided.

It is intended that this EIAR will assist SDCC, statutory consultees and the public in assessing all aspects of the proposed development.

1.12. Structure Methodology

1.12.1 Structure of the EIAR

The overall structure and scope of this EIAR has regard to the information required by the EU/EC Directives, Statutory Regulations and relevant environmental guidelines prepared by the Environmental Protection Agency (EPA). The EIAR has been written and illustrated with figures in a manner which, insofar as possible, is intended to be understandable to the public generally. A Non-technical Summary has been prepared in accordance with the statutory regulations and is submitted as a separate document to this EIAR, i.e. Volume I – Non-Technical Summary. The appendices to this EIAR contain background and technical details relating to the project and are referred to in the relevant Chapters, with all relevant appendices incorporated to the rear of the chapters in this volume of the EIAR.

The structure used in this EIAR is a Group Format structure. This structure examines each environmental topic in a separate section of the EIAR document. The Chapter Headings reflect the broadened scope of the environmental factors introduced by the 2014 Directive.

1.12.2 Contributors

This EIAR has been prepared on behalf of the developer by a design team of qualified experts, as required by Article 5(3) of Directive 2014/52/EU. The contributors involved in the preparation of this EIAR are identified at the beginning of each Chapter and in Table 1.2 of Section 1.11 of this EIAR and their qualifications and competence are described.

1.12.3 Methodology

A systematic approach is employed using standard descriptive methods, replicable prediction techniques and standardised impact descriptions to provide an appropriate evaluation of each environmental topic under consideration. An outline of the methodology used to ensure consistency in each chapter of this EIAR and to examine each environmental topic is detailed in Table 1.1:

Section	Description
Introduction	Provides an overview of the specialist area and specifies the specialist who prepared the assessment.
Study Methodology	Outlines the method by which the relevant assessment of the development impacts has been conducted within that chapter.
Baseline Situation	Describes and assesses the receiving environment, the context, character, significance and sensitivity of the baseline receiving environment into which the proposed development will fit.
Construction Impacts and Mitigation	Describes the specific, direct and indirect impacts that may arise during the construction phases of the development. A description of the appropriate mitigation measures either practicable or reasonable is also provided in this section
Operational Impacts and Mitigation	Focuses on the operational phase of the proposed development and describes the specific, direct and indirect impacts that may arise together with appropriate mitigation measures.
Do Nothing Impact	Describes a scenario in which the development does not proceed and the environment would not change as a result.
Monitoring	Describes the monitoring of the development 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. The level of monitoring, along with the methods and the agencies that are responsible for such monitoring. The level of monitoring proposed is proportionate to the nature, location and size of the project and the significance of its effects. 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. The level of monitoring, along with the methods and the agencies that are responsible for such monitoring. The level of monitoring proposed is proportionate to the

	nature, location and size of the project and the significance of its effects.
Reinstatement	While not applicable to every aspect of the environment considered within the EIAR, certain measures need to be proposed to ensure that in the event of the proposal being discontinued, there will be minimal impact on the environment.
Interactions	Where applicable, the assessment refers to impact interactions, including potential indirect, secondary and cumulative impacts.
Difficulties encountered	Where applicable, any difficulties encountered by the environmental specialist in compiling the required information are noted.

Table 1.1: EIAR Methodology Outline

1.12.4 Forecasting Methods

The individual forecasting methods used to assess the various effects of the proposed development on the environment are outlined in the relevant chapters of this EIAR under the subheading *'Assessment Methodology'*.

1.12.5 Difficulties Encountered

Some details of the project and the construction methodology/programme are matters which may be subject to change depending on the contractor(s) appointed and other considerations which are not finalised at this stage, and which cannot be finalised until a grant of planning permission for the proposed development has been issued. However, these matters will not alter the nature or extent of the proposed development, and the Contractor will be obliged to implement all mitigation measures proposed for the construction phase of the project.

No other significant difficulties were encountered in the preparation of the EIAR. Any limitations or technical difficulties associated with assessment of an environmental factor are detailed in the relevant chapter.

1.12.6 Terminology

In accordance with the EPA Guidelines on the Information to be contained in Environmental Impact Statements (2002) and Advice Notes on Current Practice in the preparation of Environmental Impact Statements (2003), the following definitions are used in this EIAR. These definitions take account of the 2022 Guidelines on the Information to be Contained in Environmental Impact Assessment Reports:
The quality of the effects is defined as:

Positive effects: A change which improves the quality of the environment (e.g. by increasing species diversity; or the improving reproductive capacity of an ecosystem, or removing nuisances or improving amenities).

Negative effects: A change which reduces the quality of the environment (e.g. lessening species diversity or diminishing the reproductive capacity of an ecosystem; or damaging health or property or by causing nuisance).

Neutral effects: A change which does not affect the quality of the environment.

The significance of the effects is described as:

Imperceptible: An effect capable of measurement but without noticeable consequences.

Not significant: An effect which causes noticeable changes in the character of the environment but without noticeable consequences.

Slight effects: An effect which causes noticeable changes in the character of the environment without affecting its sensitivities.

Moderate effects: An effect that alters the character of the environment in a manner that is consistent with existing and emerging trends.

Significant effects: An effect which, by its character, magnitude, duration or intensity alters a sensitive aspect of the environment.

Very significant: An effect which, by its character, magnitude, duration or intensity significantly alters the majority of a sensitive aspect of the environment.

Profound effects: An effect which obliterates sensitive characteristics. The magnitude of the effect is, where appropriate, indicated as:

Extent: Describe the size of the area, the number of sites, and the proportion of a population affected by an effect.

Duration: Describe the period of time over which the effect will occur. (See further detail below)

Frequency: Describe how often the effect will occur. (Once, rarely, occasionally, frequently, constantly – or hourly, daily, weekly, monthly, annually)

Context: Describe whether the extent, duration, or frequency will conform or contrast with established (baseline) conditions (is it the biggest, longest effect ever?)

The probability of the effect is, where appropriate, indicated as:

Likely Effects: The effects that can reasonably be expected to occur as a result of the planned project if all mitigation measures are properly implemented.

Indeterminable Effects: When the full consequences of a change in the environment cannot be described.

`*Worst case'* Effects: The effects arising from a project in the case where mitigation measures substantially fail.

The duration of the effect is, where appropriate, indicated as:

Momentary Effects: Effects lasting from seconds to minutes

Brief Effects: Effects lasting less than a day

Temporary Effects: Effects lasting for one year or less.

Short-term Effects: Effects lasting one to seven years.

Medium-term Effects: Effects lasting seven to fifteen years.

Long-term Effects: Effects lasting fifteen to sixty years.

Permanent Effects: Effects lasting over sixty years.

The type of effect is described, where appropriate, as:

Cumulative Effects: The addition of many small effects to create one larger, more significant, impact.

Do-nothing Effects: The environment as it would be in the future should no development of any kind be carried out.

Indeterminable Effects: When the full consequences of a change in the environment cannot be described.

Irreversible Effects: When the character, distinctiveness, diversity or reproductive capacity of an environment is permanently lost.

Residual Effects: The degree of environmental change that will occur after the proposed mitigation measures have taken effect.

Worst-case: The impacts arising from a development in the case where mitigation measures substantially fail.

Synergistic Effects: Where the resultant effects is of greater significance than the sum of its constituents.

Indirect Effects: Effects that arise off-site or are caused by other parties that are not under the control of the developer (such as a quarry)

Secondary Effects: Effects that arise as a consequence of a project (a new waste water treatment plant will reduce the yield of mussels in a nearby estuary)

1.12.7 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 are fully aware of the environmental implications of any decisions. The 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 SDCC. 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.

1.12.8 Links between EIAR and Appropriate Assessment

A Natura Impact Statement (NIS) for Appropriate Assessment (AA) was carried out for the proposed development to determine if there is a risk of effects to any Natura 2000 site and accompanies this EIAR as a separate document that is submitted as part of the planning application.

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. These two different types of assessment are independent and are required by separate legislation.

1.12.9 Availability of EIAR Documents.

A copy of this EIAR document and Non-Technical Summary is available for purchase at the offices of South Dublin County Council at a fee not exceeding the reasonable cost of reproducing the document. The application can also be viewed on the SHD website www.oldcourtlrd.ie set up by the applicant.

1.12.10 Impartiality

This EIAR document has been prepared with reference to a standardised methodology which is universally accepted and acknowledged. Recognised and experienced environmental specialists have been used throughout the EIA process to ensure the EIAR document produced is robust, impartial and objective.

It should be noted that, as highlighted above, an important part of the EIA process is preventative action which causes the project design team to devise measures to avoid, reduce or remedy significant adverse impacts in advance of applying for consent. As a result, where no likely significant impacts have been identified where they might reasonably be anticipated to occur, the design and layout of the proposed development has generally been amended to minimise the potential of any likely significant adverse impacts.

1.12.11 Statement of Difficulties Encountered

No particular difficulties, such as technical deficiencies or lack of knowledge, were encountered in compiling any of the specified information contained in this statement, such that that the prediction of impacts has not been possible. Where any specific difficulties were encountered, these are outlined in the relevant chapter of the EIAR.

1.12.12 EIA Quality Control and Review

Armstrong Fenton Associates is committed to consistently monitoring the quality of EIAR documents prepared both in draft form and before they are finalised, published and submitted to the appropriate competent authority taking into account latest best-practice procedure, legislation and policy. The EPA

published guidelines on information to be contained in Environmental Impact Assessment Report[2] and the Department of Housing, Planning, Community and Local Government have published a consultation paper[3], which have been consulted in the preparation of this EIAR. This document includes a detailed EIAR Review Checklist which has been used to undertake a review of this EIAR document.

1.12.13 Errors

While every effort has been made to ensure that the content of this EIAR document is error free and consistent, there may be instances in this document where typographical errors and/or minor inconsistencies do occur. These typographical errors and/or minor inconsistencies are unlikely to have any material impact on the overall findings and assessment contained in this EIAR.

1.12.14 Reference List

At the end of each chapter in Part B, each contributor has included a reference list of sources relied on in that Chapter. Below is a detailed list of references which have generally informed the descriptions and assessments included in this EIAR.

EU Directives / Legislation

- The EU Directives on Environmental Impact Assessment (85/337/EEC as amended by 97/11/EC, 2003/35/EC, 2009/31/EC (codified in 2011/92/EU) and 2014/52/EU).
- The Planning and Development Act, 2000 (as amended).
- The Planning and Development (Amendment) (Large-scale Residential Development) Act, 2021.
- The Planning and Development Regulations, 2001 (as amended).

EIA and related Guidance

- *Guidelines on the Information to be contained in Environmental Impact Statements*, EPA (2002)
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- *Advice Notes on Current Practice in the preparation of Environmental Impact Statements*, EPA (2003)
- *Guidelines on the Information to be contained in Environmental Impact Assessment Reports*, EPA (2022)
- *Advice Notes for preparing Environmental Impact Statements* (Draft), EPA (2015)
- *Appropriate Assessment of Plans and Projects in Ireland, Guidelines for Planning Authorities* DEHLG (2009)
- *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment*, DECLG (2013)

[2] *Guidelines on the Information to be contained in an Environmental Impact Assessment Report, Environmental Protection Agency, 2022*

[3] *Transposition of 2014 EIA Directive (2014/52/EU) in the Land Use Planning and EPA Licencing Systems - Key Issues Consultation Paper, Department of Environment, Community and Local Government, 2017.*

- Circular PL1/2017 – *Implementation of Directive 2014/52/EU on the effects of certain public and private projects on the environment (EIA Directive): Advice on Administrative Provisions in Advance of Transposition,* DHPCLG (2017)

Planning Policy (National, Regional, Local)

- The National Planning Framework (Project Ireland 2040)
- Eastern & Midland Regional Assembly Regional & Spatial Economic Strategy 2019-2031
- Smarter Travel – A Sustainable Transport Future 2009-2020
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024),
- Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023.
- Design Manual for Urban Roads and Streets, 2013
- The Planning System and Flood Risk Management – Guidelines for Planning Authorities 2009
- National Cycle Manual
- South Dublin County Development Plan 2022 - 2028
- Ballycullen - Oldcourt Local Area Plan 2014

1.12.15 List of Abbreviations

The following is a non-exhaustive list of abbreviations used in this EIAR. Where an abbreviation is not listed below it is clarified in the relevant chapter of this EIAR.

AA: Appropriate Assessment
AADT: Annual Average Daily Traffic
ACA: Architectural Conservation Area
ABP: An Bord Pleanála
BOD: Biochemical Oxygen Demand
CAP: Climate Action Plan
CDP: County Development Plan
CEMP: Construction and Environment Management Plan
CFRAMS: Catchment Flood Risk Assessment and Management Study
CMP: Construction Management Plan
CNT: Construction Noise Threshold
CoF: Confirmation of Feasibility
DoCHG: Department of Culture, Heritage and the Gaeltacht
DECLG: Department of the Environment, Community and Local Government
DED: District Electoral Division

DEFRA: Department of Environment Food and Rural Affairs
DEHLG: Department of the Environment, Heritage and Local Government
DELG: Department of the Environment and Local Government
DHPCLG: Department of the Housing, Planning, Community and Local Government
DMURS: Design Manual for Urban Roads and Streets
DoD: Department of Defence
EEC: European Economic Community
EIA: Environmental Impact Assessment
EIAR: Environmental Impact Assessment Report
EIS: Environmental Impact Statement
EPA: Environmental Protection Agency
ESB: Electrical Supply Board
EC: European Commission
EV: Electric Vehicle
EU: European Union
GDSDS: Greater Dublin Strategic Drainage Strategy
GSI: Geological Survey of Ireland
HDV: Heavy Duty Vehicle
INDC: Intended Nationally Determined Contributions
IOA: Institute of Acoustics
IW: Irish Water
LAP: Local Area Plan
LRD: Large-scale Residential Development
KER: Key Ecological Receptors
NBDC: Natural Biodiversity Data Centre
NHA: Natural Heritage Areas
NIS: Natura Impact Statement
NIR: Natura Impact Report
NPF: National Planning Framework
NPWS: Natural Parks and Wildlife Service
NRA: National Roads Authority
NTA: National Transport Authority
OPW: Office of Public Works
pNHA: Proposed Natural Heritage Areas
RMP: Record of Monuments and Places
RPS: Record of Protected Structures
RPGs: Regional Planning Guidelines
RSES: Regional Spatial and Economic Strategy
SAC: Special Area of Conservation
SCI: Site of Community Importance
SDCC: South Dublin County Council
SEA: Strategic Environmental Assessment
SEO: Strategic Environmental Objective
SI No: Statutory Instrument Number
SPA: Special Protection Areas
SSFRA: Site Specific Flood Risk Assessment
TII: Transport Infrastructure Ireland
TMP: Traffic Management Plan
UNFCCC: United Nations Framework Convention on Climate Change
WFD: Water Framework Direction
ZOI: Zone of Influence

1.12.16 Project Team

This EIAR has been prepared on behalf of the developer by a team of qualified experts, as required by Article 5(3) of Directive 2014/52/EU. The contributors involved in the preparation of this EIAR are identified in Table 1.2, below, and at the beginning of their relevant Chapters in Part B.

Chapter	Author(s)
Non – Technical Summary	Armstrong Fenton Associates, Planning Consultants: Tracy Armstrong BA, MRUP, MIPI, MRTPI
1. Introduction	Armstrong Fenton Associates, Planning Consultants: Tracy Armstrong BA, MRUP, MIPI, MRTPI
2. Planning Policy Context	Armstrong Fenton Associates, Planning Consultants: Tracy Armstrong BA, MRUP, MIPI, MRTPI
3. Description of Project and Alternatives	Armstrong Fenton Associates, Planning Consultants: Tracy Armstrong BA, MRUP, MIPI, MRTPI
4. Population and Human Health	Armstrong Fenton Associates, Planning Consultants: Tracy Armstrong BA, MRUP, MIPI, MRTPI
5. Biodiversity / Species and Habitats	Enviroguide Consulting: Sanni Hintikka, BSc, PhD & Others (Refer to Chapter)
6. Land, Soils & Geology	Pinnacle Consulting Engineers: Shaun O'Reilly, Pr Tech Civ Eng
7. Water	Pinnacle Consulting Engineers: Shaun O'Reilly, Pr Tech Civ Eng
8. Air Quality	AWN Consulting Ltd: Ciara Nolan MSc. Env Sci, BSc energy Systems Eng, MAMIAQM, MAMIEnvSc
9. Climate	AWN Consulting Ltd: Ciara Nolan MSc. Env Sci, BSc energy Systems Eng, MAMIAQM, MAMIEnvSc
10. Noise and Vibration	AWN Consulting Ltd: Abe Scheele (Acoustic Consultant)
11. Material Assets: Built Services	Pinnacle Consulting Engineers: Shaun O'Reilly, Pr Tech Civ Eng
12. Material Assets: Transportation	Pinnacle Consulting Engineers: Ronan Kearns, BA BAI MSc MBA CEng MIEI
13. Material Assets: Resource and Water Management	AWN Consulting Ltd.: Chonaill Bradley, BSc in Environmental Science
14. Archaeology & Cultural Heritage	Archaeology Plan: Antoine Giacometti BA MIAI
15. The Landscape	Macroworks: Mark Salisbury, BA Hons, Dip LA, CMLI
16. Identification of Significant Impacts / Interactions	Armstrong Fenton Associates, Planning Consultants: Tracy Armstrong BA, MRUP, MIPI, MRTPI
17. Summary of EIA Mitigation & Monitoring Measures	Armstrong Fenton Associates, Planning Consultants: Tracy Armstrong BA, MRUP, MIPI, MRTPI

Table 1.2: EIAR Project Team

2.0. Planning and Policy Context

2.1. Introduction

2.1.1 This chapter has been prepared by Armstrong Fenton Associates Planning Consultants (Tracy Armstrong BA MRUP MIPI MRTPI) and outlines the planning context for the development proposal located in the townlands of Bohernabreena, Oldcourt and Killininny, Dublin 24.

2.1.2 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.

2.1.3 Capami Ltd. wishes to apply for permission for a Large-Scale Residential Development (LRD) on this site, c. 20.4 hectares, located in the townlands of Bohernabreena, Oldcourt and Killininny, Dublin 24.

2.1.4 The proposed development provides for 523 no. apartments, comprised of 255 no. 2, 3 & 4 bed, 2 & 3 storey, detached, semi-detached and terraced houses, 206 no. 1, 2 & 3 bed duplex units in 20 no. 2 & 3 storey blocks, and 62 no. 1, 2 & 3 bed apartments in 4 no. 2-3 & 3-4 storey blocks, along with a 2 storey childcare facility of c. 457sq.m**.**

2.1.5 Vehicular access to the development will be via 4 no. access points, as follows: (i) from the west of the site via 2 no. accesses located off Bohernabreena Road, (ii) from the north of the site via 1 no. access at Dodderbrook Place, and (iii) from Oldcourt Road (the R113) to the east, via adjoining residential development at Ballycullen Gate. The proposed development includes for pedestrian and cyclist connections and accesses throughout the proposed development and to adjoining lands to the north at Dodderbrook Avenue and to the north-west into St. Anne's GAA club. The proposed development includes the demolition of all existing structures on site, including 2 no. single storey dwellings and outbuildings/sheds (total demolition area: c. 4,152.06m²).

2.1.6 The site is located within the administrative area of South Dublin County Council (SDCC). This Planning and Policy Context Chapter describes how the proposed development complies with the stated and statutory requirements of SDCC with respect to planning and sustainable development. The relevant local planning policy with which the proposed development complies primarily comprises the South Dublin County Development Plan 2022-2028 (hereafter "CDP"). Under the CDP, the proposed development site is located on land zoned objective "Res-N", the objective of which is: *"To provide for new residential communities in accordance with approved area plans".* This is included in the Core Strategy with regards to the availability of land to deliver residential development. Therefore, the proposed development is consistent with the policies and zoning objectives outlined in the South Dublin County Development Plan 2022-2028.

2.1.7 In addition, the application site is located within the area subject to the Ballycullen-Oldcourt Local Area Plan, 2014, (as extended) (hereafter "LAP") forms the basis for development of approximately 90 hectares (222 acres) of land, which are in the majority zoned objective 'Res-N' for new residential development, located at the Ballycullen-Oldcourt fringe, stretching across the foothills of the Dublin mountains, and forming a buffer to the existing suburban areas of Tallaght, Firhouse and Knocklyon. We note that the LAP is due to expire and that by the time a decision is due on this LRD planning application, the LAP may have expired. Notwithstanding same, the CDP has zoned the application site for residential land use and also contains various policies / objectives relating to the subject lands, including designating it as a "Housing Capacity Site" in its Core Strategy and setting out roads objectives, all of which the proposed LRD adheres to. We consider that the spirit / principles for development as set out in the LAP have been carried over to the current CDP, to which the proposed development has had full regard. It is

therefore considered that the permission being sought can be granted in line with the County Development Plan land use zoning objectives attached to the application site, as well as according with a wide range of national and regional planning policy, all of which are detailed in the accompanying Statement of Consistency.

2.1.8 The development now being our forward for permission is a Large-scale Residential Development (LRD). The definition of 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.

2.1.9 The new LRD arrangements comprise three stages: (i) pre-application consultation stage, (ii) planning application stage and (iii) 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 South Dublin County Council on 1st March 2024.

2.1.10 Planning Application Boundary

As SDCC will note from the Application Form and submitted Site Ownership Map, some of the lands within the red line application site boundary include lands outside the applicant's ownership, these lands are within the control of Dublin City Council, South Dublin County Council and Mr. Pat Grimes, all of whom have consented to their inclusion (refer to letters of consent which are included with this application).

2.2. National Planning Context

2.2.1. The National Planning Framework - Project Ireland 2040

Published on published on 16th February 2018 and replacing the previous National Spatial Strategy (NSS), the National Planning Framework (hereafter "NPF") sets out a national spatial strategy for the next 20 years to support sustainable and balanced development approaches to significant demographic changes. The NPF aims to secure the highest quality of life for people and communities through the development of high quality and well managed built and natural environments. The NPF particularly focuses on compact growth and increased densities in appropriate locations. The NPF is accompanied by a 10 year capital investment plan known as the National Development Plan and together these publications as known as Project Ireland 2040

Within the NPF, the subject site, being located in Dublin Santry is noted for its strategic location. The NPF states an objective to support the future growth and success of Dublin as Ireland's leading global city of scale, by better managing Dublin's growth to ensure that more of it can be accommodated within and close to the city. Enabling significant population growth in the Dublin metropolitan area, together with better management of the trend towards overspill into surrounding counties whilst increasing housing supply in the right locations, such as the proposed development in Oldcourt, underlines the need to develop the city in a co-ordinated manner so that sustainable growth and investment can be secured. The importance of developing of the subject site in a sustainable manner of scale is emphasised in National Policy Objective

2A & National Policy Objective 6.
The NPF has a number of directly relevant national policy objectives (NPO) that articulate delivering on a compact urban growth programme. These include:

- NPO 3(a) relating to the delivery at least 40% of all new homes nationally, within the built-up footprint of existing settlements;
- NPO 4 relating to attractive, well-designed liveable neighbourhoods;
- NPO 5 relating to sufficient scale and quality of urban development;
- NPO 6 relating to increased residential population and employment in urban areas;

In addition, the NPF contains the following *inter alia* objectives:

- NPO 32 which targets the delivery of 550,000 additional households to 2040 and
- NPO 33 relates to the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

Further details of the development proposal's compliance with the NPF policies and objectives can be found in the Statement of Consistency which accompanies this planning application.

2.2.2. 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 17th December 2021. This planning application constitutes a Large-Scale Residential Development (LRD) and is being applied for permission in accordance with this process.

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 considered to be consistent with objectives of Housing for All - a New Housing Plan for Ireland. The development provides for 523 no. new residential dwellings on a greenfield site zoned for residential development and is located within the existing urban footprint of Dublin.

The provision of 523 no. dwellings on the subject site will substantially add to the residential accommodation available in South Dublin thus increasing new housing supply, which will ultimately aid the objective to increase housing affordability. The proposed dwellings will be available to individual purchasers thus supporting homeownership.

The proposed development caters for 523 no. dwellings comprised of 1, 2, 3 & 4 bed houses, apartments and duplex units, with 95 no. of the total of dwellings proposed to be delivered to as Social & Affordable Housing, representing 10-20% of the total dwellings, in compliance with the requirements of Part V of the Planning & Development Act, 2000 (as amended). The proposed development is therefore increasing social housing delivery in South Dublin and supportive of the objectives to increase social inclusion.

2.2.3 Smarter Travel – A Sustainable Transport Future 2009 – 2020

The Smarter Travel document details the government's policy for delivering a more sustainable transport system and meeting an international obligation to tackle climate change. The document targets five key targets to achieve same being:

- Reduce overall travel demand and commuting distances of private car
- Maximise the efficiency of the transport network
- Reduce reliance on fossil fuels
- Reduce transport emission and
- 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 accords with the overall vision for better integration between land-use and transport. The proposed LRD, a medium density residential development, located proximate to existing local neighbourhood facilities and public transport routes. The proposed development will be well serviced by public transport and proposes to accommodate future provision of 2 no. new bus stops along the main link street, supporting a transition to more sustainable transport means with the street being of a size capable of supporting bus services in a safe manner. Two bus stops will be provided along the proposed road link scheme. Based on feedback from the NTA, these bus stops will not be provided for in this application. Instead, the bus stops have been identified and allowed for their retrofitting across the footpath/cycle path at some point in the future.

The proposed development has also been designed to provide pedestrian / cyclist permeability a priority, making walking / cycling a more attractive and viable form of transport. The provision of car parking within the proposed development has been kept to a minimum. The overall car parking ratio is c.1.4 spaces per residential unit. This will encourage both future residents and visitors to leave their cars behind and seek other, more sustainable, transport means.

The subject site is also readily accessible by public transport and cycling from a range of employment hubs in the area and, as such, the proposed development is considered to be situated in a sustainable location and in accordance with the compact development aims of this document.

2.2.4. Transport Strategy for the Greater Dublin Area 2016 – 2035

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 objectives of the strategy 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.

2.2.5. Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities, 2024.

Published in January 2024, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (hereafter “SRDCS Guidelines”) constitute Ministerial Guidelines under Section 28 of the Planning and Development Act 2000 (as amended), and to which Planning Authorities and An Bord Pleanála shall have regard to and shall apply any specific planning policy requirements (SPPRs) of the SCS Guidelines, in the performance of their functions. They replace the previous 2009 Sustainable Residential Development in Urban Areas Guidelines, and its accompanying Urban Design

Manual which translates the Guidelines into practice. Currently, we await the publication of a new Design Manual to accompany the SRDCS Guidelines.

The SRDCS Guidelines set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on residential development and the creation of sustainable and compact settlements. The SCS Guidelines and build on and update previous guidance to take account of current Government policy and economic, social and environmental considerations.

Section 3.3 "Settlements, Area Types and Density Ranges" of the SCS Guidelines states that *"the strategy for all cities is to support consolidation and intensification within and close to the existing built up footprint of the city and suburbs area and metropolitan towns; and to support sustainable urban extension at locations served by public transport".* It goes onto state that the key priorities for city growth are *inter alia:*

- *"deliver sustainable and compact urban extension at scale at suitable strategic and sustainable development locations that are close to the existing built-up footprint of the city and suburbs area or a metropolitan town and served by existing or proposed high-capacity public transport,*

- *Deliver sequential and sustainable urban extension at suitable locations that are closest to the urban core and are integrated int, or can be integrated into, the existing built-up footprint of the city and suburbs area or a metropolitan town".*

The SRDCS Guidelines provide density ranges which is broken down into different areas and the subject site can be described (as per Table 3.1 of these Guidelines) as being located in: "City Suburban/Urban Extension". These areas are described as being: *"Suburban areas are the lower density car-orientated residential suburbs constructed at the edge of cities in the latter half of the twentieth and early twenty first century, while urban extension refers to the greenfield lands at the edge of the built up area that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range 40 dph to 80 dph (net) shall generally be applied at suburban and urban extension locations, and that densities of up to 150 dph (net) shall be open for consideration at accessible urban locations (defined in Table 3.8)".*

The proposed development is within the Metropolitan Area of Dublin City, albeit it on the edge of the urban built up area and, as per these Guidelines, i.e. Tables 3.1 and 3.8, the site can be described as a "City - Suburban/Urban Extension" and is located in an "Intermediate Location" respectively. The subject site is currently within a 1-2km walking distance of existing public transport services, with the proposed east-west link street accommodating 2 no. future bus stops that may provide future public transport (bus) services. In addition, given the proposed street network, accessibility, permeability and connectivity proposed for all users (vehicular / pedestrian / cyclist) ensures good, proximate access to a wide range of services, facilities, employment and educational opportunities, and amenities, and therefore, it is considered that the scale and quantum of development proposed for the subject site achieves compact growth.

The development provides for a net density of c. 42 no. dwellings per hectare. It is considered that given the location of the site in close proximity to a number of surrounding services, including existing and potential future public transport links, that the proposed density for the subject site is appropriate in this instance, and accords with the guidance set out in Table 3.1 of the Guidelines.

2.2.6. Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, 2023.

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, and have been subsequently updated in in respect of Shared Accommodation and "Build-to-Rent" developments, with the most up to date version of these guidelines being the July 2023 version. 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 AFA Planning Consultants, which demonstrates the compliance of the proposed development with the relevant quantitative standards required under the Apartment Guidelines 2023.

2.2.7. Design Manual for Urban Roads and Streets, 2019

The Design Manual for Urban Roads and Streets were prepared by the Department of Transport, Tourism and Sport, together with the DoECLG to provide guidance and standards for urban roads and streets. These guidelines seek to avoid the creation of traffic corridors for private vehicles and promote a focus on creating places for pedestrians, cyclists and public transport.

DMURS encourages designers to give due consideration to creating a *'sense of place'* which is of core significance to the creation of safe and more integrated street designs. The guidance document notes that four interlinked characteristics influence the sense of place within a street, including:

- **Connectivity:** The creation of vibrant and active places requires pedestrian activity. This in turn requires walkable street networks that can be easily navigated and are well connected.

- **Enclosure:** A sense of enclosure spatially defines streets and creates a more intimate and supervised environment. A sense of enclosure is achieved by orientating buildings toward the street and placing them along its edge. The use of street trees can also enhance the feeling of enclosure.

- **Active Edge:** An active frontage enlivens the edge of the street creating a more interesting and engaging environment. An active frontage is achieved with frequent entrances and openings that ensure the street is overlooked and generate pedestrian activity as people come and go from

buildings.

- **Pedestrian Activity/Facilities:** The sense of intimacy, interest and overlooking that is created by a street that is enclosed and lined with active frontages enhances a pedestrian's feeling of security and well-being. Good pedestrian facilities (such as wide footpaths and well-designed crossings) also make walking a more convenient and pleasurable experience that will further encourage pedestrian activity.

The DMURS guidance emphasises that the above mentioned four characteristics represent the basic measures that should be established in order to create people friendly streets that facilitate more sustainable neighbourhoods.

DMURS recommendations have been incorporated into the design of the development and the adopted design approach successfully achieves the appropriate balance between the functional requirements of different network users whilst enhancing the sense of place. The implementation of an efficient car parking provision and a high bicycle parking provision actively promotes a modal shift to alternative forms of transport while also creating high-quality open spaces as part of the development. This scheme prioritises pedestrians and cyclists throughout the development. This LRD planning application includes a DMURS Statement of Compliance prepared by Pinnacle Consulting Engineers – please refer to same for further details

2.2.8. The Planning System and Flood Risk Management – Guidelines for Planning Authorities. 2009

The Planning System and Flood Risk Management guidelines provide detailed guidance on the role that flood risk should play at different levels of the planning system. The Guidelines require the planning system at all levels to avoid development in areas at risk of flooding, particularly floodplains, 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. Planning Authorities must implement these guidelines to ensure that, where relevant, flood risk is a key consideration in development plans and local area plans and in the assessment of planning applications. The guidelines should also be utilised by developers and the wider public in addressing flood risk in preparing development proposals.

A Site-Specific Flood Risk Assessment (SSFRA) prepared by Kilgallen & Partners Consulting Engineers accompanies this LRD planning application as a separate standalone document. The SSFRA has been prepared to comply with current planning legislation, in particular the recommendations of the guidelines for full details please refer to same; however, for convenience a summary is provided below.

Section 8 of the submitted SSFRA provides details of the Justification Management Test that was carried out in accordance with the FRMG, with the proposed development passing the required Development Management Justification Test.

As an inland site upstream of tidal influences and possible wave action, the Site is not subject to coastal flood risk and so this mechanism does not need to be considered further in this assessment.

The assessment therefore considered flood-risk from the following mechanisms:

- Fluvial;
- Pluvial;
- Groundwater;

- Drainage Infrastructure

For Fluvial and Pluvial flood risk, mitigation measures are recommended, as outlined above, and Subject to the implementation of these measures, the development was considered to not be at risk from either fluvial flooding or pluvial flooding and to not give rise to an increase in fluvial and pluvial flood risk elsewhere.

In terms of groundwater, the SSFRA asserts that initial assessment of existing flood risk indicators indicates the site is not at risk from groundwater flooding.

Taking all of the forgoing into account, the submitted SSFRA concludes *"The proposed development is not at risk of flooding and will not increase flood risk elsewhere. The proposed development is therefore appropriate from a flood risk perspective".*

Please refer to submitted SSFRA by Kilgallen & Partners, Consulting Engineers for full details.

2.2.9. The National Cycle Manual, 2011

The National Cycle Manual was established by the National Transport Authority to ensure that prospective developments promote active travel means and support changing transport choices by incorporating cycling within transport networks more proactively. The manual embraces the principles of sustainable safety to offer a safe traffic environment for all road users, including cyclists, and offer guidance on integrating cycling routes in the design of urban areas.

In total, the proposed development caters for 1,268 no. bicycle parking spaces, comprised of:

- 1,024 no long term residential spaces
- 14 no. non-residential long term spaces
- 225 no. short term residential spaces
- 5 no. non-residential long term spaces.

Further details of the proposed bicycle parking and rationale for the proposed quantum are set out in the enclosed Traffic and Transport Assessment (TTA) prepared by Pinnacle Consulting Engineers – please refer to same.

2.2.10. Urban Development and Building Heights Guidelines for Planning Authorities 2018

The Urban Development and Building Heights Guidelines (2018) reflect the policies and objectives of the NPF which support a move towards performance based criteria to achieve more compact forms of urban growth. The guidelines contain 4 no. Specific Planning Policy Requirements (SPPRs) which should be applied by both Planning Authorities and ABP in their assessment of development proposals. Generally, the SPPR's seek to increase building height and density in appropriate locations even if the development proposal may contradict specific objectives of the relevant development plan or local area plan.

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 the outer suburbs of Dublin. an already built-up commuter area such as Dublin City Centre. The application site occupies a greenfield, outer suburban site and the proposed development is comprised of housing of a scale and character that is in keeping with existing and permitted development in the surrounding environs. Buildings address the streets creating good street frontage and new open spaces for use by the wider community are created that connect to adjoining lands thus creating and improving the local environment. The layout of the proposed development and the distribution of varying building heights has taken into account the topography of the site, the need to create good urban street frontage. In consideration of the receiving environs, the proposed building heights are predominantly 2 – 3 storeys, with one no. stepped 3-4 storey building (Block C) proposed, and the submitted Architectural Design Statement demonstrates that various character areas are proposed throughout the development that responds to the locational context of the site.

The proposed development is fully compliant with all the SPPRs and stated criteria of the Guidelines and therefore the proposed building heights of 2, 3 and 3-4 storeys are fully justified in the context of the national policy.

2.2.11. Quality Housing for Sustainable Communities - Best Practice Guidelines (2007)

The Quality Housing for Sustainable Communities Guidelines promote high standards in the design and construction of new residential developments. The Guidelines identify core principles and criteria that have been found, from experience, to be particularly relevant to the creation of high-quality living environments for future residents. Guidance within this document is arranged under five headings as follows:

- Site Selection
- Design Brief, Procurement and Cost Control
- Urban Design Objectives in the Provision of Housing
- Scheme Layout and Design
- Dwelling Design

The application is accompanied by a Housing Quality Assessment (HQA) which demonstrates that the proposed dwellings conform to the principles and criteria set out within the Quality Housing for Sustainable Communities guidelines, where applicable.

The application is also accompanied by an Architectural Design Statement, prepared by Davey & Smith Architects, and a Planning Statement and Statement of Consistency both prepared by Armstrong Fenton Associates, which demonstrate development's compliance with the aforementioned guidelines and the Apartment Guidelines – for full details please refer to same.

2.2.12. Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009)

The Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities sets out the different steps and stages that are needed to establish whether a plan or project can be implemented without damaging an existing Natura 2000 site. The Guidelines indicate the role to be played by

professional ecologists and other professionals in identifying potential impacts on same and provide details on potential mitigation measures to avoid of such impacts. Where such impacts cannot be avoided the Guidelines detail imperative reasons of overriding public interest which may allow a project to proceed.

In accordance with the above guidelines, Appropriate Assessment of the proposed development has been prepared by Enviroguide Consulting and is submitted as a separate documents - please refer to same. The submitted AA Screening Report asserts that the proposed development has been assessed, taking into account:

- The nature, size and location of the proposed works and possible impacts arising from the construction works.
- The QIs and conservation objectives of the European sites
- The potential for in-combination effects arising from other plans and projects.

The AA Screening Report concludes that *"upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that the possibility **may be excluded** that the Proposed Development will have a significant effect on any of the European sites listed below:*

- *North Dublin Bay SAC*
- *South Dublin Bay SAC*
- *South Dublin Bay and River Tolka Estuary SPA*
- *North Bull Island SPA*
- *Wicklow Mountains SPA*

*However, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that the possibility **cannot be excluded** that the Proposed Development will have a significant effect on any of the European sites listed below:*

- *Glenasmole Valley SAC*
- *Wicklow Mountains SAC*

Glenasmole Valley SAC is located along the Ballinascorney Road, and as such the potential for significant impacts via inadvertent spread of invasive species by construction related traffic (commercial and private vehicles) could not be ruled out. In addition, it is considered that the likelihood for indirect impacts via potential water quality deterioration within the Dodder River on any otters associated with the Wicklow Mountains SAC that may inhabit the Dodder River in proximity to the Site, cannot be excluded in the absence of site-specific detail on best practice surface water protection measures.

On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available and objective information, that the possibility of any significant effects on any European sites, whether arising from the project itself or in combination with other plans and projects, cannot be excluded. Thus, there is a requirement to proceed to Stage 2 of the AA process; and a NIS has been prepared and accompanies this submission under separate cover".

A Natura Impact Statement (NIS) has been prepared and is included as a separate document – please refer to same. The enclosed NIS concludes that

"This Natura Impact Statement details the findings of the Stage 2 Appropriate Assessment conducted to further examine the potential direct and indirect impacts of the Proposed LRD at Bohernabreena, Oldcourt, Ballycullen, Co. Dublin, on the following European Sites:

- *Glenasmole Valley SAC (001209)*
- *Wicklow Mountains SAC (002122)*

The above sites were identified by a screening exercise that assessed likely significant effects of a range of impacts that have the potential to arise from the Proposed Development. The Appropriate Assessment investigated the potential direct and indirect effects of the proposed works, both during construction and operation, on the integrity and qualifying interests of the above European sites, alone and in combination with other plans and projects, taking into account the site's structure, function and conservation objectives.

Where potentially significant effects were identified, a range of mitigation and avoidance measures have been suggested to avoid them. This NIS has concluded that, once 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. Where applicable, a suite of monitoring surveys have been proposed to confirm the efficacy of said measures in relation to ensuring no adverse impacts on the habitats of the relevant European sites have occurred.

As a result of the complete, precise and definitive findings in of this NIS, it has been concluded, beyond reasonable scientific doubt, that the Proposed Development will have no significant adverse effects on the Qis, SCIs and on the integrity and extent of Glenasmole Valley SAC or Wicklow Mountains SAC. Accordingly, the Proposed Development will not adversely affect the integrity of any relevant European site".

2.3. Regional Context

2.3.1. Regional Planning Context - Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031

The Eastern & Midland Regional Assembly 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. At this strategic level the guidelines provide a framework to better manage spatial planning and economic development throughout the Eastern & Midland region by setting the context for each local authority to develop their own county development plans / local area plans in a manner that ensures national, regional and local planning policies align.

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% or 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 Strategy is underpinned by key principles that reflect the three pillars of sustainability: Social, Environmental and Economic, and expressed in a manner which best reflects the challenges and opportunities of the Region. The plan identifies that the central need is for the RSES to be people focussed, as *'quality of life'* encapsulates strong economic output and stability, good environmental performance and a good standard of living for all.

The subject site is located with the Dublin Metropolitan Area, as designated by the Strategy. The Metropolitan Area Strategic Plan (MASP) which is part of the RSES seeks to focus on a number of large scale strategic sites, based on key corridors that will deliver significant development in an integrated and sustainable fashion.

The NPF also sets out ambitious targets to achieve compact growth with 50% of housing to be provided within or contiguous to the built-up area of Dublin city and suburbs. To achieve this *'the MASP identifies strategic residential and employment corridors along key public transport corridors existing and planned, that contain development opportunities.'* The proposed development of 523 no. dwellings provides for the consolidation and intensification of a site located adjacent to / between existing residential developments on lands zoned for residential land use.

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 aforementioned guidelines, objectives of the NPF and the RSES EMRA, whereby this application for permission for a LRD enables the consolidation of a strategically located site within the metropolitan area.
Further details of the development proposal's compliance with the RSES policies and objectives can be found in the Statement of Consistency (section 6) which accompanies the planning application – please refer to same.

2.4. Local Context

2.4.1 South Dublin County Development Plan 2022-2028

Land-Use Zoning

The majority of the subject site is currently zoned objective "Res-N": *"To provide for new residential communities in accordance with approved area plans"* in the existing South Dublin County Development Plan 2022-2028 (hereafter "CDP"). The current proposal for the development of 523 no. residential dwellings and a childcare facility on the subject site is therefore considered appropriate and in compliance with the land-use zoning objective attached to the site.

A triangular portion of the site at the northwest (adjacent to St. Anne's GAA club) is zoned objective "RES": "*To protect and / or improve residential amenity".* Under this land use zoning objective, residential development is permitted in principle, with childcare facility being a use that is open for consideration.

At the north of the site, a strip of land, currently zoned objective "OS": *"To preserve and provide for open space and recreational amenities"* is included for infrastructural purposes i.e. to accommodate a proposed 225mm Ø Foul Sewer pipe. It is put forward that given the proposed sewer pipe will be located underground, the provision of a use compatible with the open space zoning above same will be possible and therefore no material contravention issues arise in relation to same. We also note that Public Services, defined in Appendix 6 of the Development Plan as including *"all service installations necessarily required by electricity, gas, telephone, radio, telecommunications, television, drainage and other statutory undertakers…"* are open for consideration under this zoning objective. The proposed infrastructure is ancillary to residential development, which is only open for consideration in accordance with H3 Objective 4, community led housing for older persons and social / affordable housing, therefore it is considered that the proposed sewer on "OS" land will not affect the future utility of the "OS" lands and no, permanent, above ground impacts will occur directly as a result of this development.

Letters of consent from South Dublin County Council and Dublin City Council to the inclusion of the land required to accommodate the proposed sewer are enclosed with this LRD application.

To the south, a small portion of land (within Neighbourhood Zone 1 & immediately south of proposed house no.s 154 - 156) is zoned "RU": *"To protect and improve rural amenity and to provide for the development of agriculture".* This parcel of land is proposed as open space, with no other development

proposed on same. Under the "RU" land use zoning objective, open space is a use that is permitted in principle under this zoning objective.

Please refer to the submitted Davey+Smith drawing no. MP13 "Overall Lands – Land Use Zoning Map" which overlays the proposed development and red line of application over the CDP Zoning Map no. 9 – an extract of same is shown overleaf in Fig. 2.1.

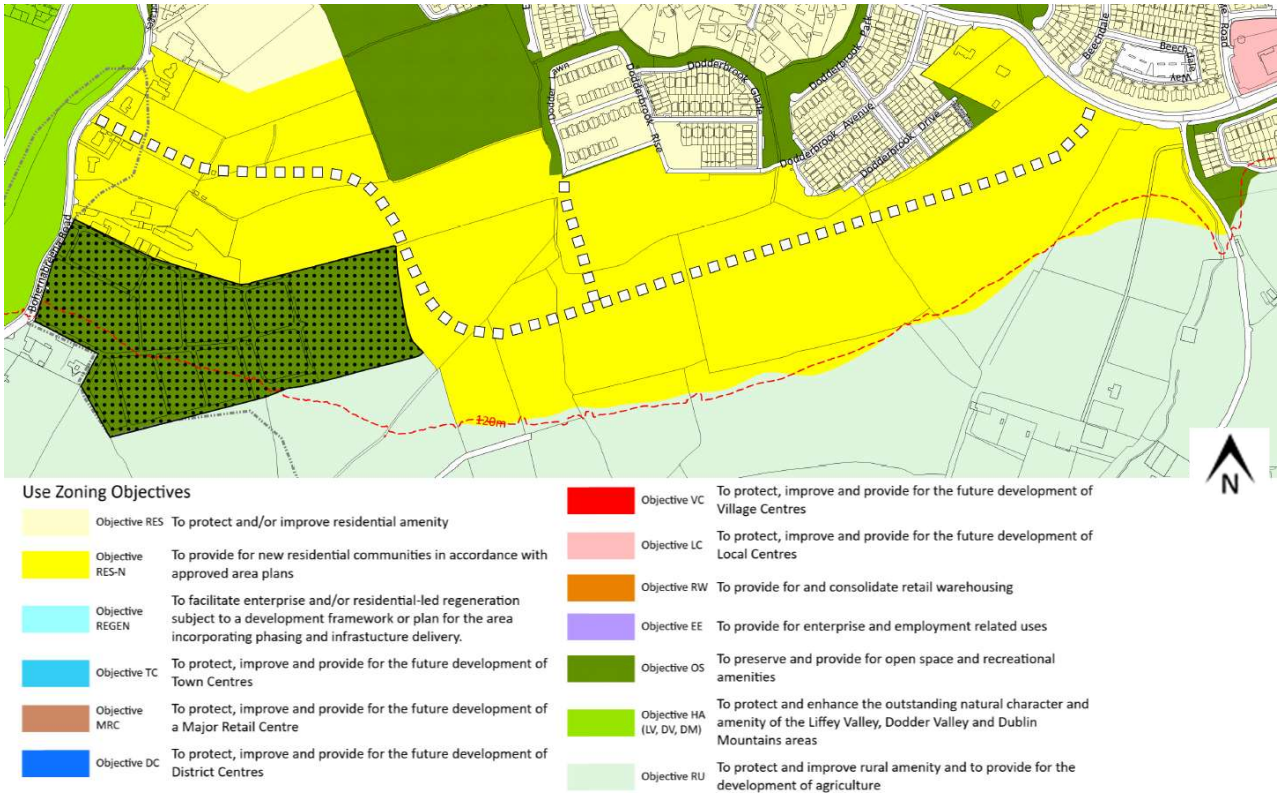

Fig. 2.1. Extract of Map 9 of the South Dublin County Development Plan, 202-2028 illustrating the Land-Use Zoning Objectives attached to the Site.

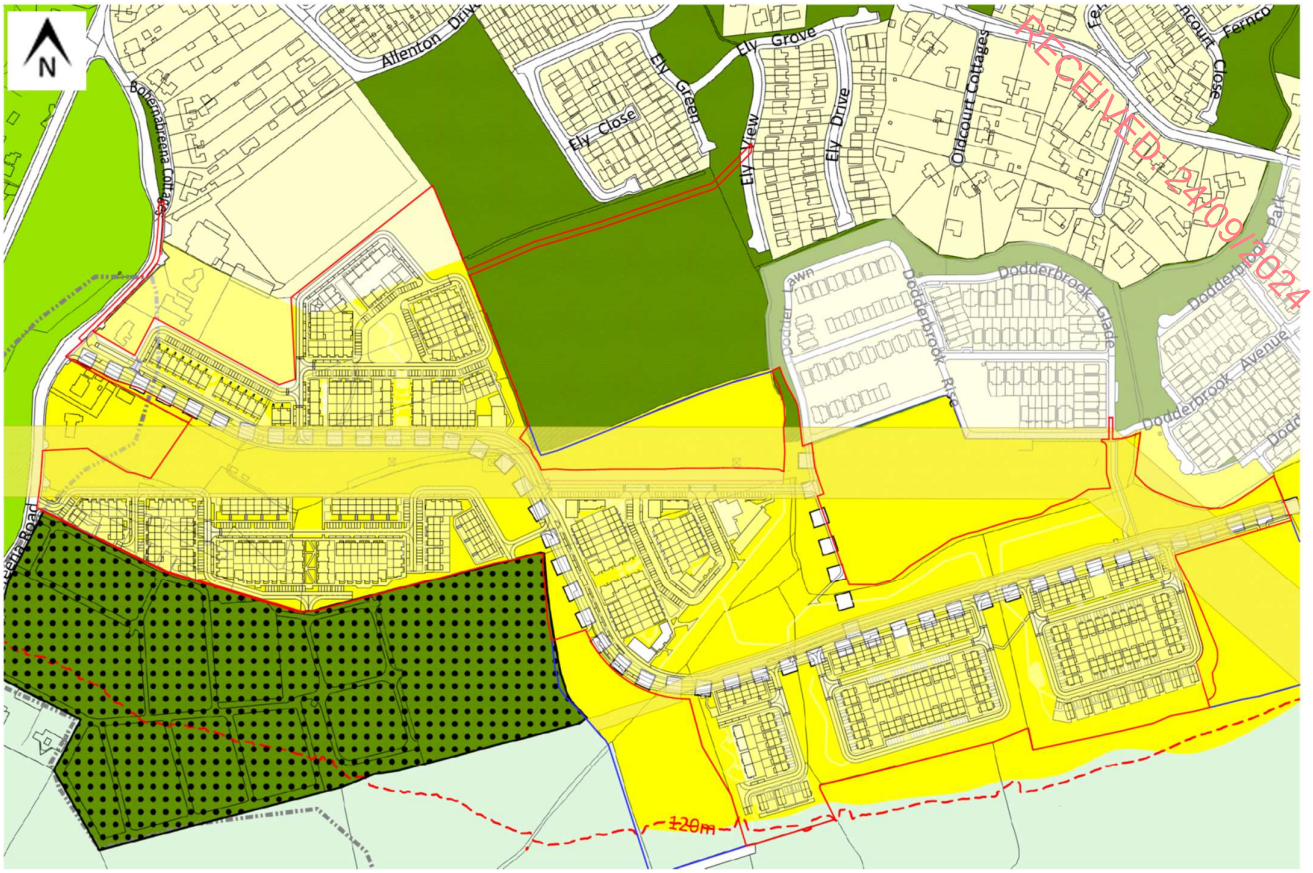

Fig. 2.2. Proposed development i.e. site layout plan & red line of LRD application overlaid on extract of Map 9 of the existing CDP illustrating the "RES-N", "RES" and "RU" Land-Use Zoning Objectives attached to the application site.

2.4.1.2 Core Strategy

Chapter 2 of the existing CDP contains the "Core Strategy and Settlement Strategy" for the county during the life of the CDP, the purpose of which is to demonstrate the quantum and location of development in the county aligns with national and regional planning policy. The Core Strategy and Settlement Strategy quantitatively demonstrates how much land is required to meet the residential and employment needs of an additional 45,000 people (approximate) up to the year 2028. The existing CDP states: *"To provide for this level of growth in line with National policy, a need for 23,730 new homes between the Census year 2016 to 2028 within the County has been identified".*

Section 2.6 of the Core Strategy identifies land capacity (i.e. land that is available for development to meet the requirements of the projected population) and states a "Land Capacity" analysis was carried out by the Planning Department to calculate the potential yield of undeveloped land (RES, RES-N, TC, REGEN, VC, DC, LC and SDZ) zoned in the previous 2016-2022 CDP. Figure 9 'Housing Capacity Sites' of the existing CDP (page 51) identifies the subject site as being located on a 'housing capacity site'. The Ballycullen area is also identified as being part of the 'Dublin City and Suburbs' settlement typology in Table 14 of the existing CDP. 'Dublin City and Suburbs' is defined as an: *"International business core with a highly concentrated and diversified employment base and higher order retail, arts, culture and leisure offer. Acts as national transport hub with strong inter and intra-regional connections and an extensive commuter catchment."*

Figure 9 of the existing CDP identifies the Ballycullen-Oldcourt Local Area Plan lands are a "Housing Capacity Site" – extract of same show overleaf as Fig. 2.3, with LAP lands circled in red.

Policy CS1: 'Strategic Development Areas' of the existing CDP seeks to: "*Prioritise housing and employment growth within the identified residential and employment growth areas set out under the Metropolitan Area Strategic Plan.*"

The subject site is zoned for new residential development in the existing CDP, is identified as being part of the 'Dublin City and Suburbs' settlement typology and identified as a 'housing capacity site' as per Figure 9 of the existing CDP and, therefore, it is considered the proposed development of 523 no. residential units on the subject site is appropriate and in compliance with the Core Strategy of the existing CDP. Further details of the proposed development's compliance with the CDP Core Strategy is set out in the accompanying Statement of Consistency (section 7.1) please refer to same.

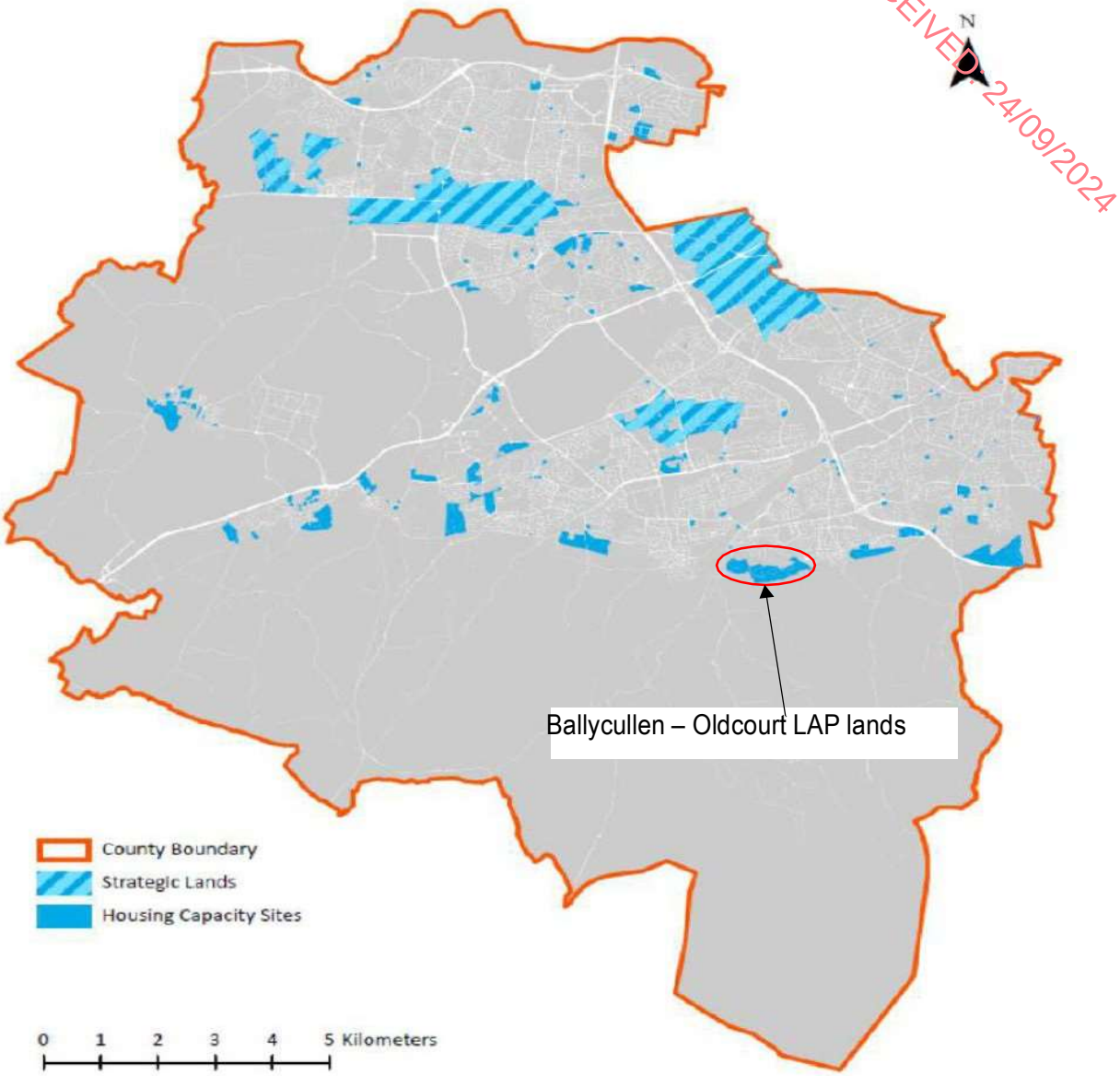

Fig. 2.3 Extract of Figure 9: Housing Capacity Sites from South Dublin County Development Plan, 2022-2028.

2.4.1.3 The CDP and the Ballycullen-Oldcourt Local Area Plan 2014

The subject site is also located within the lands designated for the Ballycullen-Oldcourt Local Area Plan, 2014, (hereafter "LAP"). With specific regard to the Ballycullen-Oldcourt LAP, it is noted **Objective QDP3 Objective 7** of Chapter 5 of the existing CDP states: *"Any development on the RES-N lands (Killinarden and Ballycullen / Oldcourt) abutting the Rural Zone at Map 9 shall be designed, located, scaled and serviced in a manner that does not detract from the character and landscape of the receiving environment bearing in mind its proximity to the HA-DM zone"*; while **Objective QDP14 SLO 3** of the same chapter states: "*That the provisions of the Ballycullen - Oldcourt Local Area Plan (2014) as extended, in respect of the steep topography in the lands zoned RES-N between Stocking Lane, Ballycullen Road and the M50 (Map 10)*

remain in force during the lifetime of this Plan having regard to ministerial guidelines". In addition to the above, it is also noted **Table 7.5** of the existing CDP (Chapter 7 'Sustainable Movement') details road objectives for the Ballycullen-Oldcourt LAP lands.

As required above, the proposed development has been carefully designed in a manner which is appropriate to the site's context, adjacent to existing residential development, ESB / Irish Water infrastructure and the Dublin mountains, with the proposed buildings being of an appropriate height and scale, and appropriately sited and stepped within the scheme to ensure the development does not detract from the character and landscape of the receiving environment, taking into account the topography of the subject lands. The proposed development also caters for the east-west main link street for the Ballycullen-Oldcourt LAP lands as per Table 7.5 "Six Year Road Programme" of the existing CDP. Given all the foregoing it is fully considered the proposed development complies with the existing CDP's policies in relation to the Ballycullen-Oldcourt LAP.

2.4.1.4 The CDP and Local Area Plans

The following policies and objectives of the existing CDP, in relation to Local Area Plans, have also been considered in the preparation of the proposed development:

- **Objective CS3 Objective 6** of Chapter 2 which seeks: *"To ensure the phased development of new housing areas in tandem with the delivery of physical and social infrastructure provision as identified within Local Area Plans or as informed by assessments carried out by the Planning Authority."*

- **Policy QDP13** of Chapter 5 which seeks to: *"Continue to work closely with all infrastructure providers to ensure the timely delivery of social, community, economic and sustainable transportation infrastructure in tandem with new residential development and in accordance with the provisions of the County Development Plan or any Local Area Plan, SDZ Planning Scheme, other strategic land designations or framework / masterplan in place in the area".*

- **Objective QDP14 Objective 1** of Chapter 5 which seeks: *"To support a plan led approach through Local Area Plans in identified areas by ensuring that development complies with the specific local requirements of the Local Area Plan, having regard to the policies and objectives contained in this Development Plan and ministerial guidelines".*

- **Objective SM3 Objective 12** of Chapter 7 which seeks to: *"To work with the NTA to secure the expansion of the bus network, including distinct new bus networks as necessary, to serve new development and regeneration areas within the South Dublin County area including Tallaght, City Edge, Adamstown, Clonburris, Fortunestown, Ballycullen and Newcastle".*

In relation to the above policies and objectives, details of how the proposed development is fully complaint with same are set out in the submitted is set out in the accompanying Statement of Consistency (section 7.1) please refer to same.

We also note that the 2014 Ballycullen-Oldcourt LAP is due to expire and that by the time a decision is due on this LRD planning application, the LAP may have expired. Notwithstanding same, the CDP has zoned the application site for residential land use and also contains various policies / objectives relating to the subject lands, including designating it as a "Housing Capacity Site" in its Core Strategy and setting out roads objectives, all of which the proposed LRD adheres to. It is therefore considered that the permission being sought can be granted in line with the County Development Plan land use zoning objectives attached to the application site, as well as according with a wide range of national and regional planning policy, as detailed

in the accompanying Statement of Consistency.

The proposed development provides for the appropriate level of physical and social infrastructure as identified in the Ballycullen-Oldcourt LAP and given the scale of development, the proposed LRD is to be delivered in a phased manner (as set out in Section 9 of the enclosed Planning Statement).

The proposed development is considered to be fully compliant with both the existing CDP and the Ballycullen-Oldcourt LAP. The proposed development allows for 2 no. new bus stops on the main link street traversing the development to be provided for in the future, as agreed with the NTA, thus aiding expansion of the bus network in the area. Given all the foregoing it is considered the proposed development complies with the existing CDP's policies and objectives in relation to the Local Area Plans.

2.4.1.5 CDP Policies and Objectives

Policies and objectives supporting the existing CDP's strategic vision are contained in the various chapters of the existing CDP. The chapters of the CDP considered most relevant to the proposed development are **Chapter 5** 'Quality Design and Healthy Placemaking' which promotes *"sustainable urban design and healthy placemaking that delivers attractive, connected, vibrant and well-functioning places to live, work, visit, socialise and invest"*; **Chapter 6** 'Housing' which seeks to ensure the *"delivery of high quality and well-designed homes in sustainable communities to meet a diversity of housing needs within the County"*; and **Chapter 12** 'Implementation and Monitoring' which sets out the *"development standards and criteria that arise out of the policies and objectives of the County Development Plan, to ensure that development occurs in an orderly and efficient manner and that it is in accordance with proper planning and sustainable development."*

The proposed development has been considered against the relevant policies and objectives of not just the aforementioned chapters but all of the chapters forming part of the CDP in order to ensure a coherent development which supports the strategic vision of the county. Full details of the proposed development's compliance with same can be found in the accompanying "Statement of Consistency" prepared by Armstrong Fenton Associates which is submitted as a separate, standalone, document and, for the avoidance of repetition, we respectfully refer the reader to this document.

2.5. Conclusion

A review of the relevant planning policy for the proposed development concludes the following:

The subject application site is located on lands zoned for development in the current South Dublin County Development Plan, 2022 – 2028. The CDP has been approved by SDCC and deemed to be in accordance with national and regional planning policy.
The environmental impacts arising from the implementation of the CDP have been examined in the making of the plan and the SEA assessments undertaken provide a strategic level assessment of the impacts on the receiving environment of implementing the proposals contained within the CDP. These assessments concluded that the implementation of the plan is not likely to result in significant environmental effects.

The development proposal is put forward in compliance with the land-use zoning designation and policy objectives contained within the CDP. Compliance with the above planning policy documents demonstrates the appropriateness of the current proposal from a proper planning and sustainable development perspective.

3.0. Description of Project and Alternatives

3.1. Introduction

This chapter has been prepared by Armstrong Fenton Associates Planning Consultants (Tracy Armstrong MRUP MIPI MRTPI) and provides a description of the project site in the context of its receiving environment and a description of the project. As required by the EIA Directive and regulations thereunder, this chapter also outlines the Main Alternatives considered.

In accordance with the EIAR preparation process, various mitigation measures are detailed in this report and can either be incorporated during the planning process or as conditions of a grant of planning permission.

The project description in Section 3.3. should be read in conjunction with the plans and particulars submitted with the planning application including the statutory planning notices and both the Planning Statement and Statement of Consistency submitted as part of the subject planning application.

3.2. Site Location & Context

The subject site measures c.20.4 hectares and is in the townlands of Bohernabreena, Oldcourt and Killininny, Dublin 24, and within the lands designated for the Ballycullen-Oldcourt Local Area Plan, 2014, (as extended).

The applicant is the owner of the majority of the application site, however, lands in the south-west part of the subject site, adjacent to Bohernabreena Road, occupied by 2 no. dwellings and outbuildings are in the ownership of Mr. Pat Grimes who has issued a letter of consent for the inclusion of his lands as part of this LRD Planning Application. In addition, the red line of application extends across lands in the control of both Dublin City Council and South Dublin County Council, through which it is proposed to provide a 225mm Ø Foul Sewer pipe to extend from the proposed LRD on the applicant's lands, eastwards via land in the control/ownership of both Dublin City Council and South Dublin County Council to connect into existing drainage infrastructure – both of the aforementioned Local Authorities have issued letters of consent to include their lands in this LRD application and we refer the reader to same, and the associated maps.

The subject site is located to the east of Bohernabreena Road (L7114) and east of Bohernabreena cemetery, south/south-east of St. Anne's GAA club, south of the Dodderbrook residential estate, west of the Ballycullen Gate residential development (currently under construction under Planning Ref.s SD17A/0468 & SD22A/0356) and west of Oldcourt Road (the R113).

The aforementioned Dodderbrook and Ballycullen Gate developments have been / are being successfully delivered respectively by the applicant. In addition, the applicant has permission for the development of 21 no. residential units located to the west of Dodderbrook (granted permission under South Dublin County Council Ref. SD19A/0104 / An Bord Pleanála Ref. ABP-305800-19) which has recently commenced construction. Permission has also been granted for the development of 71 no. units to the immediate west of the subject site under Ref. SD23A/0083. Further east of the subject site is the Ballycullen Green residential estate and the Gunny Hill playing pitches, which have also been delivered by the applicant in recent years.

The application site also lies within the boundary of the Ballycullen-Oldcourt Local Area Plan (2014, as extended) lands (hereafter "Plan lands") which stretch across the foothills of the Dublin mountains, forming a buffer between the mountains and the existing suburban areas of Tallaght, Firhouse and Knocklyon. The Plan lands are bounded to the west by Bohernabreena Road, to the east by the M50, to the north by existing suburban development, including for the Allerton, Ely, Beechdale, Hunters Wood, Woodstown, and Dalriada estates, and to the south by the foothills of the Dublin mountains. With their mountainous backdrop, the Plan lands are generally semi-rural in setting; however, they also benefit from views of the suburban and urban

hinterland. The prevailing development in the immediate vicinity is generally comprised of two and three storey housing.

Fig. 3.1 Location of the Subject Site within the Plan Lands.

Over the last decade, several new residential developments have been constructed within the Plan lands, with the lands primarily being zoned for new residential development. It is relevant to note that for the purposes of the Ballycullen-Oldcourt Local Area Plan's phasing strategy, the Plan lands are divided into "eastern" and "western" sides, with Ballycullen Road being the point of division.

To the east of the subject site, on the eastern side of the Plan lands, residential development has taken place to the south of Stocking Avenue (i.e., Abbots Grove and Stocking Wood) and to the north of Stocking Avenue (i.e., Dalriada). Also east of the subject site, on the western side of the Plan lands, residential development has taken place to the south of Hunter's Road (i.e., Ballycullen Green and Hunters Wood) and to the north of Hunter's Road (i.e., Hunters Wood).

In its existing state, the subject site is characterised by a sloped terrain, rising to the south, existing native hedgerows, and existing services infrastructure. The site is currently greenfield agricultural lands, dissected with mature hedgerow boundaries, with existing dwellings and buildings located in the south-western part of the site, all of which are proposed to be demolished. The site is at the urban edge of the County, with residential development to the north and open field agricultural lands to the south.

There is an existing ESB pylon corridor, with an associated wayleave, running across the site from west to east, and an existing Irish Water main, with an associated wayleave, also running across the site from west to east. The proposed development has been designed to allow for the accommodation of these existing infrastructure and their wayleaves, including for all necessary set-backs / development restrictions, within the proposed layout.

The site has the presence of hedgerows, characterized by a thick growth of shrubs, bushes, and trees, which create natural boundaries. In addition, the site has the presence of some small streams. The

proposed development has been carefully considered to accommodate the retention of existing hedgerows as much as feasibly possibly, with new planting proposed to supplement any loss, with existing streams also accommodated into the proposed landscaping features – as per the submitted landscaping proposals prepared by Gannon + Associates.

The site also has some existing buildings / structures located in the western part of the site (north of Bohernabreena cemetery) which are proposed to be demolished as part of the development. These existing buildings / structures are not protected structures nor are they of any particular historical or architectural interest. Plans of the buildings to be demolished are submitted as part of this application, including 2 no. habitable dwellings. The total floor area of the structures to be demolished is 4,152.06m².

The subject site generally falls from south to north, with a high point of the southern boundary of Approximately 119.78m OD Malin. The lowest point along the northern boundary is approximately 98.12m OD Malin where the site connects into an existing ditch.

The ground level rises steeply from north to south - there is a difference of approximately 21.0m in elevation between the north and south. The ground level continues this steep gradient south of the Site. The ground level falls away north of the Site but at a shallower gradient.

A key component of the proposed development is the provision and completion of the east-west main link street through the centre of the site, that will connect Oldcourt Road (R113) to the east with Bohernabreena Road (L7114) to the west. This main link street was identified in the Ballycullen – Oldcourt LAP under its Accessibility and Movement strategy (section 5.2 of the LAP) which required the provision of a new "Main Link Street" (a primary street) that will connect the Oldcourt Road with the Bohernabreena Road. We also note that the current South Dublin County Development Plan 2022-2028 (hereafter "CDP") includes the Ballycullen – Oldcourt Street Network in its Six Year Road Programme (Table 7.5), and as identified on the land us zoning map (map no. 9) for the area – refer to Fig 3.2 below:

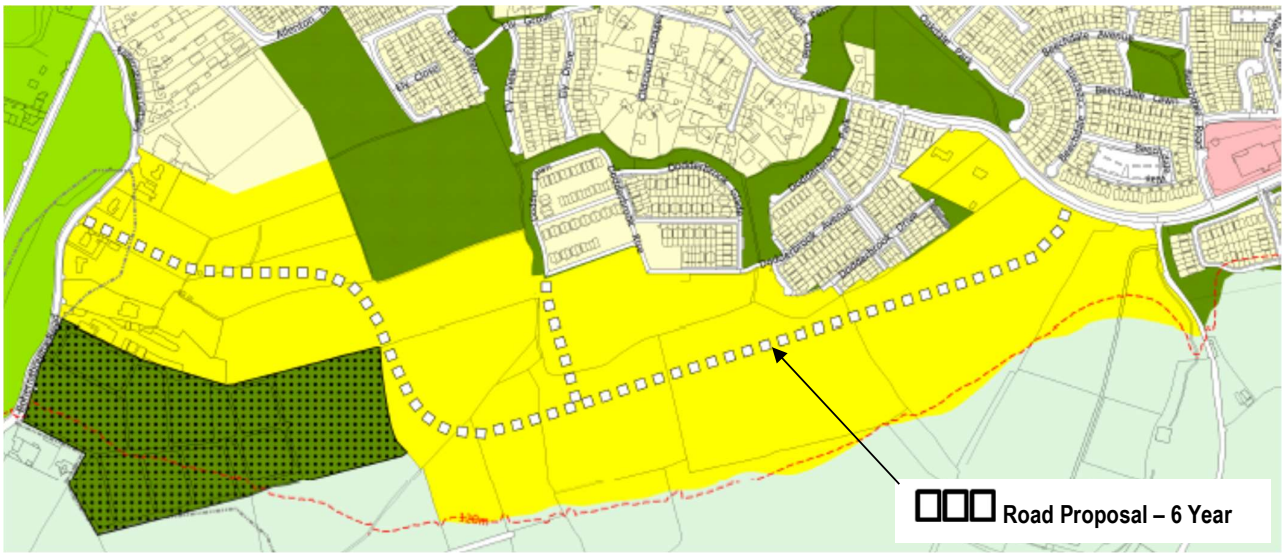

Fig. 3.2 - Extract from CDP Land Use Zoning Map No. 9 – illustrating Ballycullen – Oldcourt Street Network in CDP Six Year Road Programme

Vehicular access to the development will be via 4 no. access points, as follows: (i) from the west of the site via 2 no. accesses located off Bohernabreena Road, (ii) from the north of the site via 1 no. access at Dodderbrook Place, and (iii) from Oldcourt Road (the R113) to the east, via adjoining residential development, at Ballycullen Gate.

3.3. Description of the Physical Characteristics of the Proposed Development

The project in question is a residential development consisting of 523 no. dwellings comprised of a mix of houses, duplex units and apartments, along with a crèche, and all associated site development and infrastructural works, open spaces, car parking, landscaping, etc.

As per the public notices for the subject planning application, the proposed development can be described as follows:

Capami Ltd. wishes to apply for a seven year planning permission for a Large-Scale Residential Development (LRD) on a site measuring c.20.4Ha, located in the townlands of Bohernabreena, Oldcourt, and Killininny, Dublin 24. The development site is located to the east of Bohernabreena Road, north and east of Bohernabreena cemetery, south and south-east of St. Anne's GAA club, south and south-west of the Dodderbrook residential estate, west of the Ballycullen Gate residential development (currently under construction) and west of Oldcourt Road (R113).

The proposed development consists of 523 no. residential units comprised of 255 no. 2, 3 & 4 bed, 2 & 3 storey, detached, semi-detached and terraced houses, 206 no. 1, 2 & 3 bed duplex units in 20 no. 2 & 3 storey blocks, and 62 no. 1, 2 & 3 bed apartments in 7 no. 2-3 & 3-4 storey blocks (i.e. Blocks A, B2 & D, and 2 no. Blocks B1 & 2 no. Blocks C), along with a 2 storey childcare facility of c. 457sq.m.

Private amenity space for the residential units is provided in the form of rear gardens for houses and ground floor terraces / upper floor balconies for apartments and duplex units. The proposed development provides for a total of c. 7.3Ha of public open space, and c. 5,505sq.m of communal open space associated with proposed residential units.

Vehicular access to the development will be via 4 no. access points, as follows: (i) from the west of the site, via 2 no. accesses, located off Bohernabreena Road, (ii) from the north of the site, via 1 no. access at Dodderbrook Place, and (iii) from the east of the site, via Oldcourt Road (R113) and via adjoining residential development at Ballycullen Gate. The proposed development includes for pedestrian and cyclist connections and accesses throughout the proposed development and to adjoining lands to the north at Dodderbrook Avenue and to the north-west into St. Anne's GAA club.

The proposed development includes the demolition of all existing structures on site, including 2 no. single storey dwellings and outbuildings/sheds (total demolition area: c. 4,152.06sq.m).

The proposed development provides for (i) all associated site development works above and below ground, including 2 no. underground foul sewerage pumping stations, (ii) public open spaces (c. 7.3Ha), (iii) communal open spaces (c. 5,505sq.m), (iv) hard and soft landscaping and boundary treatments, (v) surface car parking (746 no. car parking spaces, including EV parking), (vi) bicycle parking (1,268 no. bicycle parking spaces), (vii) bin & bicycle storage, (viii) public lighting, and (ix), plant / PV panels (M&E), utility services & 5 no. ESB sub-station/kiosks, all on an overall application site area of c.20.4Ha.

The proposed development essentially seeks to develop the majority of the western side of the Plan lands, connecting Oldcourt Road (the R113) and Bohernabreena Road by delivering much need new housing, with appropriate regard having been given to the objectives of both the Ballycullen-Oldcourt LAP and the existing South Dublin CDP, as applicable.

This application seeks permission for the development of 523 no. dwellings, comprised of:

- 255 no. 2, 3 & 4 bed, 2 & 3 storey detached, semi-detached and terraced houses,
- 64 no. 1, 2 & 3 bed Urban Duplexes – "E1, E2, E3 & E4 types" in 9 no. 3 storey buildings,
- 142 no. 2 & 3 bed apartments/duplex units in Duplex Blocks A, B, C, D and E1, E2 & E3 in 11 no. 3 storey buildings,
- 62 no. 1, 2 & 3 bed apartments in Blocks A, B1, B2, C and D in 7 no. 3 and 3-4 storey buildings,
- A 2 storey creche of c.457m².

[Note: we are counting the proposed apartment Block C as 2 no. buildings].

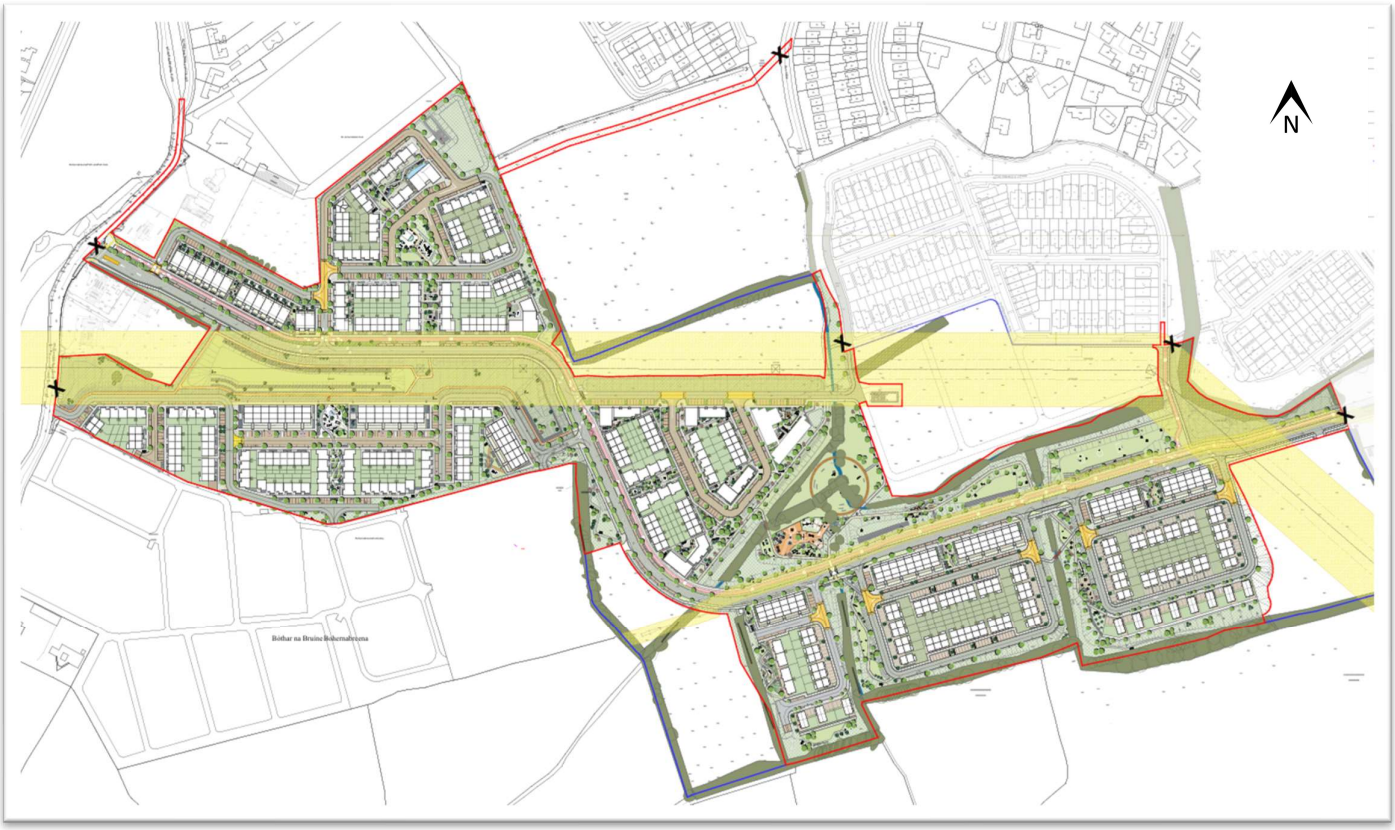

Fig. 3.3 – Proposed Site Layout Plan

There is a wayleave traversing the subject site accommodating existing overhead 220kV ESB wires and associated pylons.

The Ballycullen – Oldcourt LAP takes into account the presence of the overhead wires and presents two development options, which differ in terms of the treatment of the existing overhead wires that traverse the western side of the Plan Lands.

The LAP asserts that *"Option A involves redirecting a 500 metre (approximate) section of the overhead lines further to the south into the path of an existing wayleave of underground watermains. This is the preferred development option given that it would free up the less elevated and more level areas of the Plan Lands for development and allow for a more coherent arrangement of streets and blocks while grouping wayleave requirements for utilities into one channel. Option B represents an arrangement of streets and blocks around the current route of the overhead transmission lines and is the less preferred development option".*

To date, the overhead lines remain in situ, however, any proposal to relocate them will be subject to permission via the Strategic Infrastructure Development (SID) planning process. The applicant has engaged with ESB Networks and the "plan" for same at present is as follows:

i. Options for re-routing the overhead wires southwards have been put forward by the applicant for agreement in principle with ESB,
ii. Upon agreement of the preferred route, the SID planning application process will commence,
iii. Upon planning consent being approved for the re-routing of the wires, the planning application process can commence for the remainder of the applicant's lands (outlined in blue on enclosed drawings).

The proposed site layout plan now put forward for permission takes into account the retention of the existing overhead ESB wires, with the adjoining land parcels in the applicant's control (as outlined in blue) that are currently affected by the overhead wires, being subject to future planning applications(s), and not forming part of this LRD application. To this end, we submit three no. drawings, prepared by Davey + Smith Architects, as follows:

- Drawing no. **MP15** which illustrates the proposed LRD now put forward for permission, and showing the existing wayleave accommodating the overhead wires, and illustrating how the wires can be relocated southwards through the applicant's adjoining lands, as outlined in blue, in a new wayleave.

- Drawing no. **MP16** which illustrates the proposed LRD as per the existing overhead wires, and illustrating an indicative housing layout on our client's adjoining, undeveloped lands, as outlined in blue, should the lines remain in their existing location, as per the existing wayleave.

- Drawing no. **MP17** which illustrates the proposed LRD, alongside potential future development on the applicant's adjoining lands (as outlined in blue) should the overhead wires be relocated southwards.

The above mentioned enclosed drawings are for information purposes only and demonstrate how the remainder of the western Plan lands, as per the Ballycullen – Oldcourt LAP, may be developed in the future, in either scenario of the overhead wires remaining in situ or being relocated. This will be dependent on the outcome of the future SID process to relocate same. It is therefore evident that in either scenario, the applicant's remaining lands (as outlined in blue) can be developed in a coherent manner that will successfully integrate with permitted and proposed adjoining residential developments, and the furthermore, the proposed LRD does not impact on the future relocation of the overhead wires.

Another key piece of infrastructure proposed is the delivery of "Oldcourt Park" which will be the primary piece of public open space proposed as part of this LRD and is located north of the east-west main ink street, directly opposite Neighbourhood Zone 1 and abutting Neighbourhood Zone 2. Please refer to the enclosed Davey+Smith drawing no. MP07 "Proposed Open Space" drawing which identifies the location, area and type of all proposed open spaces.

Oldcourt Park occupies an area of 23,587.7sq.m (c.2.36Ha). It will be directly accessible from the main link street, with various pedestrian/cyclist crossings provided for allowing ease of access. Abutting this park, on the northern side of the main link street are dedicated pedestrian and cycle paths. In addition, the proposed

development provides for pedestrian and cyclist paths directly from Oldcourt Park (at its north-eastern corner) into Dodderbrook to the north, while its north-western corner also caters for access into Dodderbrook as well.

3.4. Site and Development Works

The project includes the following works:

- Residential development (523 no. dwellings);
- Creche (c.457m²)
- Public and private open spaces;
- Landscaping;
- Services infrastructure, utilities and public lighting;
- Car parking and bin storage;
- ESB Substations/Kiosks;
- Building and directional signage and
- All associated site and development works,
- Demolition of existing buildings/structures on site (c. 4,152.06m²).

Further details are provided in the plans and reports submitted with the planning application.

3.5. Project Life-Cycle

Beyond the construction and operational phases, there are no further phases of development envisaged for this project.

3.6. Demolition

Permission is sought for the demolition of the existing, existing dwellings (2 no.)/buildings/structures on site (c. 4,152.06m²).

3.7. Residential Development

In summary, the proposed development comprises the construction of 523 no. dwellings comprised of 255 no. 2, 3 & 4 bed, 2 & 3 storey detached, semi-detached and terraced houses, 64 no. 1, 2 & 3 bed Urban Duplexes – "E1, E2, E3 & E4 types" in 9 no. 3 storey buildings, 142 no. 2 & 3 bed apartments/duplex units in Duplex Blocks A, B, C, D and E1, E2 & E3 in 11 no. 3 storey buildings,62 no. 1, 2 & 3 bed apartments in Blocks A, B1, B2, C and D in 7 no. 3 and 3-4 storey buildings, and a 2 storey creche of c.457m².

[Note: we are counting the proposed apartment Block C as 2 no. buildings].

Dwelling Type	1 bed	2 bed	3 bed	4 bed	Total	Percentage %
Houses	0	61	160	34	255	49%
Apartments	24	31	7	0	62	12%
Duplex	0	71	71	0	142	27%
Urban Duplex (E types)	27	5	32	0	64	12%
Total	51	168	270	34	523	100%
Percentage %	10%	32%	52%	6%	100%	-

Table 3.1 – Overall Residential Development Mix

A wide variety of dwelling typologies are included in the proposal all dispersed throughout the proposed development. Details of same are set out in section 7.7 of the submitted Planning Statement and on the submitted architectural drawings – please refer to same.

There are four distinct "Neighbourhood Zones" dispersed throughout the entire site, each with its own distinct design. A variety of units types and building heights are also dispersed throughout the entire layout to create variety and distinctiveness throughout. This is illustrated in more detail in the submitted Architectural Design Statement – please refer to same.

3.8. Non-Residential Development

The development proposal includes for a stand alone creche facility measuring c. 457m² located located in Neighbourhood Zone 3, with associated external play area of c.63m² and 7 no. dedicated car parking spaces.

3.9. Car Parking and Cycle Parking Provision

Car parking for the proposed development is provided for in the form of surface level parking. In total, the proposed development caters for 746 no. car parking spaces.
For the houses, car parking will be provided in a mix of on-street and within the curtilage of each house. On street surface car parking will be provided for the apartments, duplexes, creches and visitor car parking spaces.

Cycle parking for the proposed development is also provided in the form of dedicated bike stands / stores, with the details of same set out on the enclosed Davey+Smith Architects drawing no. MP22. In total, the proposed development caters for 1,268 no. bicycle parking spaces.

Please refer to the enclosed Traffic & Transport Assessment (TTA) carried out by Pinnacle Consulting Engineers for full details of parking in the proposed scheme.

3.10. Adjoining Development

This is a location in which residential use is a long established use, with further residential development having been permitted to the north and east and within the Ballycullen - Oldcourt LAP area under numerous permissions. Lands to the north include housing and playing pitches. Lands to the south are unzoned, agricultural lands, and the Bohernabreena Cemetery. Lands to the east have been developed over the last decade or so, in accordance with the LAP.

3.11. Access

Vehicular access to the development will be via 4 no. access points, as follows: (i) from the west of the site via 2 no. accesses located off Bohernabreena Road, (ii) from the north of the site via 1 no. access at Dodderbrook Place, and (iii) from Oldcourt Road (the R113) to the east, via adjoining residential development, at Ballycullen Gate.

A key component of the proposed development is the provision and completion of the east-west main link street through the centre of the site, that will connect Oldcourt Road (R113) to the east with Bohernabreena Road (L7114) to the west. This main link street was identified in the Ballycullen – Oldcourt LAP under its Accessibility and Movement strategy (section 5.2 of the LAP) which required the provision of a new "Main Link Street" (a primary street) that will connect the Oldcourt Road with the Bohernabreena Road. The aim is to open up the Plan lands with a clear hierarchy of integrated streets for universal movement to include pedestrians, vehicles and cyclists. This will include the main link street which will then be fed by Local Link Streets (secondary streets) and Local Streets (tertiary streets) that will open up the lands for residential development.

The proposed development includes for pedestrian and cyclist connections and accesses to adjoining lands to the north, east and west, and includes for cycling and pedestrian routes and infrastructure throughout.

As part of the proposed development, the entirety of the site will be opened up to pedestrian and cyclist permeability, inviting people into this new suburban neighbourhood, with the proposed design seeking to provide multiple pedestrian / cyclist access points to help to integrate the development with its surroundings. All site access and internal circulation arrangements ensure the development is a safe and pedestrian / cyclist friendly environment for future residents and visitors alike.

3.12. Construction

3.12.1. Construction Management

A Resource & Waste Management Plan (R&WMP) has been prepared for the proposed development and accompanies the planning application. Certain assumptions are made in the R&WMP based on the information available at this time and, for the avoidance of doubt, it is not proposed or intended that the applicant / contractor(s) are bound by these proposals which may change depending on the timing and circumstances pertaining at the time of construction.

The R&WMP incorporates mitigation measures and construction methodologies outlined in this EIAR and is considered to provide the baseline requirements off which the contractor will work. It will remain a live document which will be updated by the contractor as construction progresses to take account of live requirements imposed by both the planning permission and the site conditions.

An Outline Construction Management Plan is submitted with the planning application and on receipt of a grant of planning and prior to the commencement of works, a detailed final Construction Management Plan (CMP) will be prepared. The contractor will be required to comply with and implement the requirements and mitigation measures as set out in this EIAR and any conditions imposed as part of planning permission.

A Construction and Environmental Management Plan has also been prepared by Enviroguide Consulting and is enclosed which addresses noise and vibration, traffic management, working hours, pollution control, dust control, road cleaning, compound/public health facilities and staff parking associated with the construction works, and is submitted as a separate document as part of this LRD planning application.

An Outline Construction Traffic Management Plan has also been prepared by Pinnacle Consulting Engineers which addresses traffic management, dust control, road cleaning, and staff parking associated with the construction works, and is submitted as part of this SHD planning application.

All of the aforementioned plans include further information on the construction programme and construction related activities. The plans also address issues relating to site access, compounds, site security, waste management contractors' responsibilities etc.

3.12.2. Construction Programme / Phasing

It is estimated that construction of the development will take approximately seven years to complete. A phasing plan also accompanies the planning application – please refer to the submitted architectural drawing MP12 which illustrates the phasing of the overall development, and Fig. 2.4 over. The intended sequence of development may change post grant of planning permission as a detailed construction programme is dependent on contractor appointment, market and other considerations.

Phase 1: will commence at the south-eastern end of the application site, in Neighbourhood Zone 1, delivering:

(i) Part of the east-west link road, continuing on from what is currently under construction to the immediate east at Ballycullen Gate,
(ii) associated public open space, including the construction of "Oldcourt Park",
(iii) and approximately 94 no. dwellings.

Note: the proposed 94 no. dwellings to be delivered in Phase 1 are comprised of:

- 2 no. A type duplex blocks – 24 no. 2 & 3 bed duplex units,
- 2 no. B type duplex blocks – 32 no. 2 & 3 bed duplex units,
- 8 x A type 4 bedroom houses,
- 12 x B type 4 bedroom houses,
- 18 x C type 3 bedroom houses,
- Total = 94 no. dwellings.

Unit Type	2 bed	3 bed	4 bed	Total
No. of Units	28	46	20	**94**

Table 3.2: Proposed Dwelling Mix to be delivered in Phase 1

Phase 2: will consist of the completion of Neighbourhood Zone 1, to the immediate west of Phase 1, delivering:

(i) Continuation of the east-west link road, continuing on from what is currently under construction to the immediate east at Ballycullen Gate,
(ii) associated public open space, including completion of "Oldcourt Park" and opening of same to the public;
(iii) delivery of proposed pedestrian and cycle links from Neighbourhood Zone 1 to Dodderbrook to the north (at Dodderbrook Avenue),
(iv) and approximately 62 no. dwellings.

Note: the proposed 62 no. dwellings to be delivered in Phase 2 are comprised of:

- 1 no. A type duplex block – 12 no. 2 & 3 bed duplex units,
- 3 x A type 4 bedroom houses,
- 11 x B type 4 bedroom houses,
- 32 x C type 3 bedroom houses,
- 4 x G type 3 bedroom houses
- Total = 62 no. dwellings.

Unit Type	2 bed	3 bed	4 bed	Total
No. of Units	6	42	46	**62**

Table 3.3: Proposed Dwelling Mix to be delivered in Phase 2

Phase 3: will be in the north-western part of the site, in the western part of Neighbourhood Zone 3 and will deliver:

(i) Northern most access off the Bohernabreena Road and part of east-west link road,
(ii) Crèche,
(iii) associated public open space;
(iv) associated infrastructural services including drainage outfalls through third party lands (upon agreement),
(v) and approximately 86 no. dwellings

Note: the proposed 86 no. dwellings to be delivered in Phase 3 are comprised of:

- 3 no. E type duplex blocks – 30 no. 2 & 3 bed duplex units,
- 28 x Urban Duplex Units – 28 no. 1, 2 & 3 bed duplex units
- 16 x C type 3 bedroom houses,
- 11 x D type 2 bedroom houses
- 1 x F type 3 bedroom house
- Total = 86 no. dwellings.

Unit Type	1 bed	2 bed	3 bed	Total
No. of Units	10	30	46	**86**

Table 3.4: Proposed Dwelling Mix to be delivered in Phase 3

Phase 4: will be in the north-western part of the site, consisting of the completion of Neighbourhood Zone 3 and commencement of Neighbourhood Zone 4, and will deliver:

(i) Continuation of the northern most access off the Bohernabreena Road and part of east-west link road,
(ii) associated public open space;
(iii) and approximately 112 no. dwellings

Note: the proposed 112 no. dwellings to be delivered in Phase 4 are comprised of:

- Apartment Block D – 9 no. 1 & 2 bed units
- 1 no. C type duplex block – 12 no. 2 & 3 bed duplex units,
- 1 no. D type duplex block – 16 no. 2 & 3 bed duplex units,
- 14 x Urban Duplex Units – 14 no. 1, 2 & 3 bed duplex units
- 36 x C type 3 bedroom houses,
- 24 x D type 2 bedroom houses
- 1 x E5 type 3 bedroom house
- Total = 112 no. dwellings.

Unit Type	1 bed	2 bed	3 bed	Total
No. of Units	10	44	58	**112**

Table 3.5: Proposed Dwelling Mix to be delivered in Phase 4

Phase 5: will be in the centre of the site, in Neighbourhood Zone 2 and will deliver:

(i) Central piece of east-west link road, thus completing same,
(ii) associated public open space,
(iii) vehicular, cycle and pedestrian links from Neighbourhood Zone 2 to Dodderbrook to the north (at Dodderbrook Place),
(iv) and approximately 101 no. dwellings.

Note: the proposed 101 no. dwellings to be delivered in Phase 5 are comprised of:

- 16 x Urban Duplex Units – 16 no. 1 & 3 bed duplex units,
- 26 x C type 3 bedroom houses,
- 6 x D type 2 bedroom houses,
- Apartment Block A – 9 no. units 1, 2 & 3 bed units,
- 2 no. Apartment Blocks B1 – 14 no. units 1 & 2 bed units,
- Apartment Block B2 – 7 no. units 1, 2 & 3 bed units,
- Apartment Block C – 23 no. units 1 & 2 bed units,
- Total = 101 no. dwellings.

Unit Type	1 bed	2 bed	3 bed	Total
No. of Units	27	37	37	**101**

Table 3.6: Proposed Dwelling Mix to be delivered in Phase 5

Phase 6: will be the final phase, in the western part of the site, adjacent to Phase 4 and completing Neighbourhood Zone 4, and will deliver:

(i) The southern most access off the Bohernabreena Road,
(ii) associated public open space,
(iii) and approximately 68 no. dwellings

Note: the proposed 68 no. dwellings to be delivered in Phase 6 are comprised of:

- 1 no. D type duplex block – 16 no. 2 & 3 bed duplex units,
- 6 x Urban Duplex Units – 6 no. 1 & 3 bed duplex units
- 25 x C type 3 bedroom houses,
- 20 x D type 2 bedroom houses
- 1 x E5 type 3 bedroom house
- Total = 68 no. dwellings.

Unit Type	1 bed	2 bed	3 bed	Total
No. of Units	3	28	37	**68**

Table 3.7: Proposed Dwelling Mix to be delivered in Phase 6

Please refer to the submitted drawing no. MP12 "Proposed Phasing Plan" which illustrates the phasing of the overall development, with an extract of same shown in Fig. 2.4 overleaf:

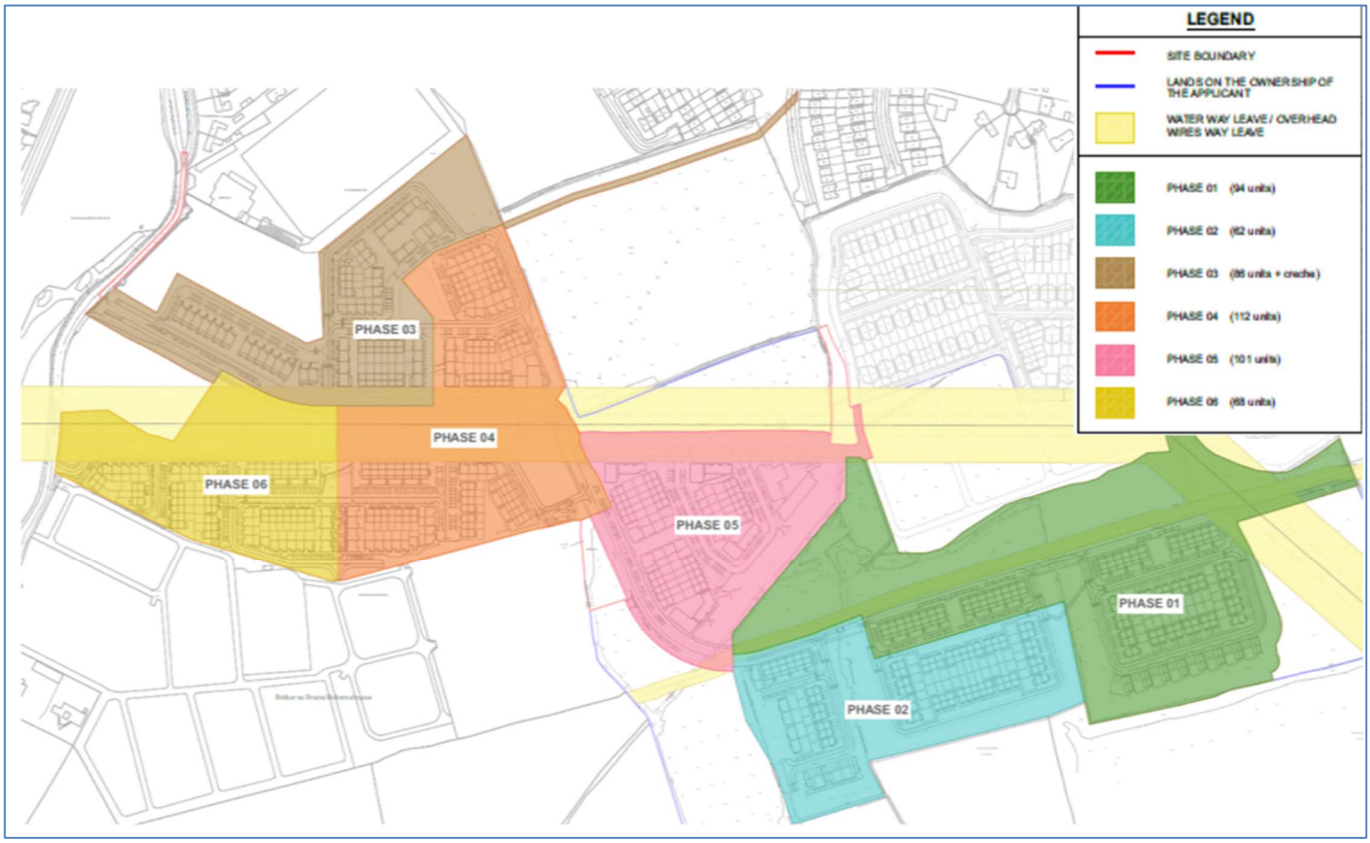

Fig. 3.4 – Extract from submitted drawing no. MP12 "Proposed Phasing Plan" & corresponding legend

3.13. Site Preparation

Permission is sought for the demolition of all structures on site totalling c. 4,152.06m².

Excavated material on site will predominantly be re-used on site / within the developer's control.

The contractor(s) will require connections to the following services / utilities for the duration of the works:

- Water supply
- Foul sewer
- Surface water sewer
- Electricity
- Telecommunications

Existing services / utilities within and adjoining the site will be protected during construction.

3.13.1. Construction Activities

The construction works associated with the project will be contained within the application site boundary. These works will include excavation, earthworks, etc.

Some construction activity may take place off-site within the control of the developer. These activities may include access and haul routes, site compound(s), storage of materials and soil/excavated material, screening and processing of existing materials for re-use within the development works, construction parking, staff welfare facilities etc. These areas will be identified in the detailed CMP.

Subject to the agreement of the Planning Authority, the following site operation hours are proposed:

- 07.00 to 19.00 – Monday to Friday;
- 08.00 to 13.00 on Saturdays;
- Works not permitted on Sundays and public holidays.

During the construction period, due to exceptional circumstances, construction work may be necessary outside these standard hours. If necessary, this will be agreed in advance with SDCC.

The contractor will be guided by the Resource & Waste Management Plan which accompanies the application with regard to re-use, recovery, recycle and disposal of waste produced during construction. Chapter 13 of this EIAR, Material Assets: Resource and Waste Management, also considered the re-use recovery, recycle and disposal of waste arising from the development.

3.13.2. Construction Material

The proposed development will have a requirement for imported materials, primarily concrete, steel, stone and asphalt. The estimated quantities for the overall development are provided in the R & WMP. The majority of new materials brought to site will be used immediately. The remainder will be stored within the site boundary.

Material excavated on the site will be used in construction. The re-use of this material reduces the quantity of materials being imported to the site. Prior to use, this material will be subject to appropriate testing to ensure material is suitable for construction. Locations to stockpile this material will be identified by the contractor(s) in the CMP.

3.13.3. Construction Traffic

An Outline Construction Traffic Management Plan (OCTMP) has been prepared with a final CTMP to be prepared by the appointed contractor prior to commencement of development which will outline proposals for construction deliveries and staff accessing the compounds and construction sites.

During all phases of construction access to all existing properties adjoining the development lands will be maintained. Local traffic management procedures will be put in place where required.

Site access / egress routes and construction traffic generation are discussed in Chapter 11 and reflected in the enclosed Outline CTMP.

3.14. Energy Statement

Conservation and Renewable Technologies that will be employed in part or in combination with each other for this development. These techniques will be employed to achieve compliance with the building regulations Part L and NZEB standards.

Principle standards and references include *inter alia*:

<u>The Energy Performance in Buildings Directive (EPBD):</u>

The EPBD was first published in 2002 (2002/91/EC) (the "EPB Directive") and has been revised as follows:

- the EPBD was recast in 2010 (2010/31/EU) (the "EPB Recast Directive")
- a revised version of the EPBD was published in 2018 (2018/844/EU) (the "EPB 2018 Directive")

The EPB Recast Directive stipulated that all new buildings must be Nearly Zero Energy Buildings by the 31st of December 2020 and all buildings acquired by public bodies by 31st December 2018.

On 14 March 2023, the European Parliament adopted draft amendments to the proposed revisions of the EPD Recast Directive. The key revisions to the EPD Recast Directive include:

- All new buildings to be zero emission from 1 January 2028; and
- New buildings occupied, operated or owned by public authorities to be zero emission by 1 January 2026. This is an enhancement on Nearly Zero Emission Building (“NZEB”) obligations introduced in 2018 (enacted in Ireland in 2019). NZEB requirements typically equate to an A3 BER rating for commercial buildings and A2 for residential with a percentage of energy needs to be derived from on site or nearby renewables.

<u>Technical Guidance Document Part L – Conservation of Fuel and Energy</u>:

This EPD Directive was adopted into Irish law as a Regulation in 2006 (S.I. No.666 of 2006) and recast in 2012 (S.I.243 of 2012), effective from 9 January 2013. The regulations transpose Directive 2010/31/EU of the European Parliament and of the Council on the energy performance of buildings (recast), as amended by Directive (EU) 2018/844 of the European Parliament and of the Council of 30 May 2018.

Each member government has discretion in how the standard is applied nationally, and to comply with the NZEB requirement, the Irish government has issued the revised Building Regulations, with the current iterations:

1. Technical Guidance Document Part L – Conservation of Fuel and Energy - Dwellings (2022)
2. Technical Guidance Document Part L – Conservation of Fuel and Energy – Buildings other than Dwellings (2022)

Part L – Dwellings stipulates requirements in the following areas (applicable to new dwellings):

- Limitation of Primary Energy Use and CO2 Emissions.
- Renewable Energy Technologies.
- Building Fabric.
- Building Services.
- Construction quality and commissioning of services.

The following renewable energy systems were considered for this development in terms of capital costs, energy performance, maintenance requirements & Part L Compliance:

a. Solar PV
b. Small scale wind power
c. Decentralised energy supply systems based on energy from renewable and waste heat sources;
d. Co-generation (combined heat and power);
e. District or block heating or cooling, particularly where it is based entirely or partially on energy from renewable and waste heat sources;
f. Heat pumps;

The final combination of products, systems and other elements employed to meet Part L and Part F will be determined by means of a Building Energy Rating for each dwelling or unit.

3.14.1 Environment / Global Issues

Increasing levels of greenhouse gases have been linked with changes in climate and predicted global warming. By far the biggest human contribution to the greenhouse gases is in emissions of carbon dioxide. The development is likely to increase carbon dioxide levels in the atmosphere by the embodied emissions in the building materials used, and in the operational energy consumed during the life of each building.

To minimise the embodied emissions impact, materials will be sourced locally where possible (reducing carbon dioxide emissions associated with transportation), and preference will be given to reusing materials, and using materials in their natural state (reducing the emissions associated with processing).

3.15. Emissions and Waste

3.15.1 Effluents

Effluent arising from foul drainage from the proposed development will be discharged through piped systems to the local authority sewers. Operation of the development will involve the discharge of uncontaminated surface water from the impermeable areas to a proposed network all linking into the established public system in the environs. Details of the impacts and remedial and reductive measures for surface water and foul drainage are recorded at Chapter 7 “Water” of this Environmental Impact Assessment Report.

3.15.2 Municipal Waste/Waste Management

A Waste Management Plan (WMP) will be prepared and shall be submitted to the Planning Authority for agreement prior to commencement of development on site. The WMP will demonstrate how the Construction Phase will comply with the following relevant legislation and relevant Best Practice Guidelines:

- Waste Management Act 1996 as amended;
- Environmental Protection Agency Act 1992 as amended;
- Litter Pollution Act 1997 as amended;
- Planning and Development Act 2000 as amended [15];
- Circular Economy and Miscellaneous Provisions Act 2022.

These Acts and subordinate Regulations transpose the relevant European Union Policy and Directives into Irish law.

The Waste Management Plan will present the potential environmental impacts, proposed monitoring methodologies, limit values where applicable, based on the concept of Best Practice and the proposed mitigation measures to be implemented at the development site. Reference to National and International Standards shall also be included where relevant.

Waste materials generated by construction activities will be managed according to the Department of the Environment, Heritage and Local Government's 2006 Publication - *Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects.*

Waste minimisation and prevention shall be the primary responsibilities of the Construction Project Manager who shall ensure the following:

1) Materials will be ordered on an *"as needed"* basis to prevent over supply
2) Materials shall be correctly stored and handled to minimise the generation of damaged materials
3) Materials shall be ordered in appropriate sequence to minimise materials stored on site
4) Sub-contractors will be responsible for similarly managing their wastes

Construction Waste Disposal Management

It is proposed that from the outset of construction activities, a dedicated and secure compound containing bins, and/or skips, and storage areas, into which all waste materials generated by construction site activities, will be established within the active construction phase of the development site.

Contaminated Soil

In the unlikely event that contaminated soils are discovered, these areas of ground will be isolated, tested for contamination in accordance with *2002 Landfill Directive (2003/33/EC),* and pending the results of laboratory testing, will be excavated and exported off-site by an appropriately Permitted Waste Contractor holding an appropriate Waste Collection permit and that this hazardous material will be sent for appropriate treatment / disposal to an appropriately Permitted / Licenced Waste Facility.

Domestic Waste Management

It shall be the responsibility of the Facilities Management Company to ensure that all domestic waste generated by apartment residents is managed to ensure correct storage prior to collection by an appropriately waste permitted waste collection company on a weekly basis.

Sufficient domestic waste storage areas shall be provided throughout the proposed residential development. It shall be the responsibility of the Facilities Management Company to ensure that appropriate signage is provided in each area notifying apartment residents of the importance to recycle domestic waste items in accordance with the requirements of the contracted Waste Collection contractor.

The proposed development shall be constructed and developed to minimise the generation of construction waste. During the construction phase, construction waste shall be stored and segregated in dedicated waste storage areas which shall optimise the potential for off-site reuse and recycling. All construction waste materials shall be exported off-site by an appropriately permitted waste contractor.

The development has been designed to provide adequate domestic waste storage areas for common residential areas (apartments) and individual houses. This will promote the appropriate segregation at source of domestic generated waste from all residential units at the development. Waste bin storage areas shall be designed in a manner to ensure that appropriate signage for the correct waste disposal and recycling is available for residents.

The crèche shall have designated commercial waste bins for both general and recyclable waste which shall be stored within the boundaries of that building area. Waste shall be collected on a weekly basis by an appropriately permitted commercial waste contractor.

3.16. Emissions

The principal forms of air emissions relate to discharges from motor vehicles and heating appliances. With regard to heating appliances, the emission of nitrogen oxides and carbon monoxide will be minimised by the use of modern, efficient heating appliances and as a result, the potential impact is estimated to be negligible. Exhaust gases from motor vehicles will arise from car parking areas and will be discharged directly to the atmosphere. Car parking for motor vehicles is provided at basement and surface levels. In general, it is noted that approximately 80% of all cars in Ireland run on unleaded fuel which can be expected to have a reductive effect on air emissions. As per the submitted plans for the apartments, 10% of the associated car parking spaces will have EV charging facilities. For the own door apartments, duplex units and houses that are afforded surface car parking, please refer to the submitted site layout plans which identify the proposed locations for EV parking (coloured blue). For private houses, future home owners will be offered the opportunity to install a charging facility within the curtilage of the property, however, the applicant's will provide the necessary piped services for same as part of the proposed site development works. It is expected therefore that the potential impact will be negligible.

Noise may be considered in two separate stages, during construction, and when the development is operational. Construction related noise impacts are an inevitable short term, limited inconvenience feature which, in general, is accepted by members of the public, subject to the standard controls typical of planning conditions attached to urban based development projects. These impacts can be reduced in a number of ways, e.g. it is standard practice to limit construction to normal working hours during the day. In addition, there are a number of regulations relating to noise during construction which the contractor will be expected to adhere to throughout the construction phase.

3.17. Direct and Indirect Effects Resulting from Use of Natural Resources

Details of significant direct and indirect effects arising from the proposed development are outlined in

Chapters 4-14 which deal with *'Aspects of the Environment Considered'*. No significant adverse impact is predicted to arise from the use of natural resources.

3.18. Direct and Indirect Effects Resulting from Emission of Pollutants, Creation of Nuisances and Elimination of Waste

Details of emissions arising from the development together with any direct and indirect effects resulting from same have been comprehensively assessed and are outlined, where relevant, in the relevant in Chapters 3-13 which deal with '*Aspects of the Environment Considered'*. There will be no significant direct or indirect effects arising from these sources.

3.19. Forecasting Methods Used for Environmental Effects

The methods employed to forecast and the evidence used to identify the significant effects on the various aspects of the environment are standard techniques used by each of the particular individual disciplines. The general format followed was to identify the receiving environment, to add to that a projection of the *"loading"* placed on the various aspects of the environment by the development, to put forward amelioration measures, to lessen or remove an impact and thereby arrive at net predicted impact.

Where specific methodologies are employed for various sections they are referred to in the Receiving Environment (Baseline Scenario) sections in the EIAR. Some of the more detailed/specialised information sources and methodologies for a number of the environmental assessments are outlined hereunder.

3.20. Transboundary Impacts

Large-scale transboundary projects[4] are defined as projects which are implemented in at least two Member States or having at least two Parties of Origin, and which are likely to cause significant effects on the environment or significant adverse transboundary impact.

Having regard to the nature and extent of the proposed development, which comprises a residential development, located in the townland of Boherboy to the east of Saggart, within the administrative area of South Dublin County, transboundary impacts on the environment are not considered relevant, in this regard.

3.21. Alternatives Examined

The consideration of Alternatives is an important part of the EIA process. By examining alternatives considered and indicating the main reasons for choosing the proposed development, it is possible to reduce or minimise environmental impacts and ensure that better solutions are not overlooked.

The EIA Directive (2014/52/EU) requires that Environmental Impact Assessment Reports include *"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 project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects."*
Article 94 and Schedule 6, paragraph 1(d) of the Planning and Development Regulations 2001 (as amended) provides for, an outline of the main alternatives studied by the developer and an indication of

[4] The definition is based on Articles 2(1) and 4 of the EIA Directive and Article 2(3) and (5) of the Espoo Convention, respectively. http://ec.europa.eu/environment/eia/pdf/Transboundry%20EIA%20Guide.pdf

the main reasons for his or her choice, taking into account the effects on the environment, i.e.:

"(d) A description of the reasonable alternatives studied by the person or persons who prepared the EIAR, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the proposed development on the environment."

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:

i. Alternative locations;
ii. Alternative uses;
iii. Alternative layouts;
iv. Alternative processes.

Pursuant to Section 3.4.1 of the Draft Environmental Protection Agency (EPA) Guidelines on the *Information to be Contained in Environmental Impact Assessment Reports* (EPA, 2017), 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 2022 Guidelines also state *"Analysis of high-level or sectoral strategic alternatives cannot reasonably be expected within a project level EIAR… It should be borne in mind that the amended Directive refers to 'reasonable alternatives… which are relevant to the proposed project and its specific characteristics'".*

The DHPLG 2018 EIA Guidelines state:

"Reasonable alternatives may relate to matters such as project design, technology, location, size and scale. The type of alternatives will depend on the nature of the project proposed and the characteristics of the receiving environment. For example, some projects may be site specific so the consideration of alternative sites may not be relevant. It is generally sufficient for the developer to provide a broad description of each main alternative studied and the key environmental issues associated with each. A 'mini - EIA' is not required for each alternative studied."

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

The location and type of development proposed has been determined by the land use zoning objectives contained in the South Dublin CDP which has been environmentally assessed, and statutorily adopted.

In the preparation of the CDP, SEA and AA were carried out. The SEA Report (Non-Technical Summary) concludes that *"the assessment of the has concluded that its objectives are acceptable and represent a balanced and fair approach to the sustainable development of the county".* It also states that *"taking into account the mitigation measures which has been integrated into the Plan, it has been determined that significant residual adverse environmental effects will not occur as a result of the implementation of the*

Plan".

An Appropriate Assessment screening of the CDP was carried out and determined that a Stage 2 appropriate assessment was required. A Natura Impact Report (NIR) accompanies the CDP as a separate document, and states that 21 no. SACs and SPAs in the vicinity of the plan were examined.

The NIR states that it "has examined and analysed, with respect to those European sites within the zone of influence of the plan, the potential impact sources and pathways, how these could impact on the European sites' qualifying interests/special conservation interest species and whether the predicted impacts would adversely affect the integrity of those European sites. It has been objectively concluded by Scott Cawley Ltd., following an examination, analysis and evaluation of the relevant information, including in particular the nature of the predicted impacts associated with the plan, that the plan will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in combination with other plans or projects. Thus, it has been objectively concluded by South Dublin County Council that the plan will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in combination with other plans or projects".

The SEA Statement on the Ballycullen - Oldcourt LAP states that *"Overall, the influence of the SEA process on the Ballycullen Oldcourt LAP has been positive. The early identification of the important environmental issues within the Plan area and refinement of those issues during the scoping process and production of the Environmental Report allowed for the adoption of meaningful environmental protection policies into the LAP. Continual assessment of policies and motions, as well as submissions and observations from interested parties also resulted in modification of policies for the benefit of the environment of South Dublin".*

As the CDP and LAP, approved and adopted by SDCC, already provide a strategic framework indicating the manner in which the site may be developed, the range of alternatives was therefore lessened. The overall development for the site in this case should comprise of:

- Residential uses
- Recreational & Open Space uses
- Development of pedestrian and cycle routes

The overall form and content of the any proposed development is fixed by the requirement of the LAP for the lands. In this regard, the consideration of alternatives during the design stage was confined to details such as:

- Residential layout and mix
- Residential density
- Design and layout of open space
- Form and layout of the vehicular access routes
- Form and layout of pedestrian and cycle routes

The development proposal in this case considered alternatives which are in keeping with the local, regional and national guidelines. In the first instance, the proposed development is considered relative to the *"do-nothing*", "*do-minimum*" and "*do-maximum"* scenarios.

3.21.1 Alternative Location, Size and Scale

The location and proposed housing mix has been determined by the land use zoning objectives contained in the SDCC Development Plan 2022-2028. In addition, cognisance has been paid to SDCC's LRD Opinion (Case Reference LRDOP001/24) in relation to density and layout / design. The proposed development has also had regard to the following Section 28 Ministerial Guidelines: (i) Guidelines for Planning Authorities on Sustainable Residential Development and Compact Settlements (2024) which refer to minimum net densities of 40 dwellings per hectare for "City – Suburban/Urban Extension" sites such as the subject site and (ii) the Guidelines for Planning Authorities on Building Heights and Urban Development, 2018 and their SPPRs.

As noted above, the LAP was subjected to its own environmental assessment including consideration of alternative scenarios. Therefore, apart from localised interpretation of the LAP to suit conditions on the ground, no alternative sites were considered in this EIAR as the development of this site for the uses proposed has been identified as a strategic objective.

This is in line with EPA Guidelines (2002 and 2022 Guidelines) which recognises that it is not realistic to consider alternative options for projects which have been previously determined by a higher plan.

"Hierarchy

EIA is only concerned with projects. Many projects, especially in the area of public infrastructure, arise on account of plans, strategies and policies which have previously been decided upon. It is important to acknowledge that in some instances neither the applicant nor the competent authority can be realistically expected to examine options which have already been previously determined by a higher authority (such as a national plan or regional programme for infrastructure or a spatial plan)." (Source: EPA Guidelines on the information to be contained in Environmental Impact Statements, Section 2.4.3. Alternatives, page 12).

It is noted that the suitability of the subject site for the nature of development proposed was considered as part of the SEA process undertaken by SDCC in the making of the both the CDP and LAP.

3.21.2. Alternative Uses

The subject lands are currently, in the majority, in greenfield, agricultural use and have no specific / relevant previous grant of permission for similar residential development attached to them.

The development proposal is located on lands zoned objective RES-N: *"To provide for new residential communities in accordance with approved area plans"* in the existing CDP, therefore; it is evident that the Local Authority supports the provision of residential development on the subject lands.

The design parameters for the development proposal are set down in the first instance in the CDP which has determined the land use objective for the site. The LAP sets out objectives in relation to density, building height and other physical characteristics. The development proposal is put forward having been guided by detailed discussions with the relevant SDCC departments, Planning, Roads & Traffic, Parks and Water and Drainage etc. prior to the proposed development being prepared. These detailed discussions highlighted the environmental issues to be addressed, which informed the design process.
Alternative site layouts and siting progressed throughout the design process in order to minimise the impact on the receiving environment at the earliest opportunity. The initial stage involved a constraints analysis of the land within the proposed development site to identify all high-level constraints and aggregate them against the site to allow a suitable layout to be developed.

The main alternative use for the subject lands would be to maintain its current agricultural use. In any event, it is envisaged that in the long term, these lands will be developed for residential purposes to accommodate much needed new housing in Dublin.

As such it was not considered necessary to consider alternative uses for the proposed development. This approach is in line with EPA Guidelines (2002 and 2022 Guidelines) which recognises that it is not realistic to consider alternative options for projects which have been previously determined by a higher plan as detailed below:

"Hierarchy EIA is only concerned with projects. Many projects, especially in the area of public infrastructure, arise on account of plans, strategies and policies which have previously been decided upon. It is important to acknowledge that ***in some instances neither the applicant nor the competent authority can be realistically expected to examine options which have already been previously determined by a higher authority*** *(such as a national plan or regional programme for infrastructure or a spatial plan)."* (Source: EPA Guidelines on the information to be contained in Environmental Impact Statements, Section 2.4.3 Alternatives, page 12).

3.21.3. Alternative Design & Layouts

The development proposal is put forward with the consent of the landowners (the Applicant and others) and as such, the development process has seen the applicant and the Local Authority work together to ensure that a number of design alternatives and layouts have been considered.

The design parameters for the development proposal are set down in the first instance in the CDP and LAP which have determined the land use mix, the building height, density and other physical characteristics. The development proposal has been guided by detailed discussions with the relevant SDCC departments, Planning, Roads & Traffic, Parks & Water and Drainage etc. prior to the proposed development being prepared. These detailed discussions highlighted the issues to be addressed, which informed the design process.

Alternative site layouts and siting progressed throughout the design process in order to minimise the impact on the receiving environment at the earliest opportunity. The initial stage involved a constraints analysis of the land within the proposed development site to identify all high-level constraints and aggregate them against the site to allow a suitable layout to be developed.

The following analyses the alternative development options that were considered for the subject site, including previous development proposals, and then describing design options and changes which were incorporated into the scheme as the proposals progressed through the design process and pre-application discussions with the Planning Authority – i.e. the S.247 pre-planning consultation and Stage 2 LRD meeting.

3.21.4. Previous Development Proposals

On parts of the subject LRD application site, three no. planning applications were previously submitted, under Ref.s SD19A/0137, SD19A/0138 and SD19A/0139. Fig. 3.5 overleaf illustrates a masterplan including each of the three previous site layout plans.

Fig. 3.5 – Previously proposed masterplan, 2019

Planning application Ref. SD19A/0138 was located in the north-west part of the current application site, close to Bohernabreena Road. Permission was sought for a residential development comprised of 52 no. dwellings. Access to the development was to be via the previously permitted Main Link Street (under Reg. Refs. SD17A/0041 & PL06S.249367).South Dublin County Council issued a notification of decision to grant permission for the above development, however, the decision was subject to a third-party appeal and permission was refused by An Bord Pleanála on 8th September 2020, under Ref. ABP-306617-20. An Bord Pleanála refused permission as it considered that *"the proposed development would not be developed at a sufficiently high density to provide for an acceptable efficiency in serviceable land usage, given the site location on zoned land".* The site layout plan proposed under Ref. SD19A/0138 is illustrated in Fig. 3.6 below.

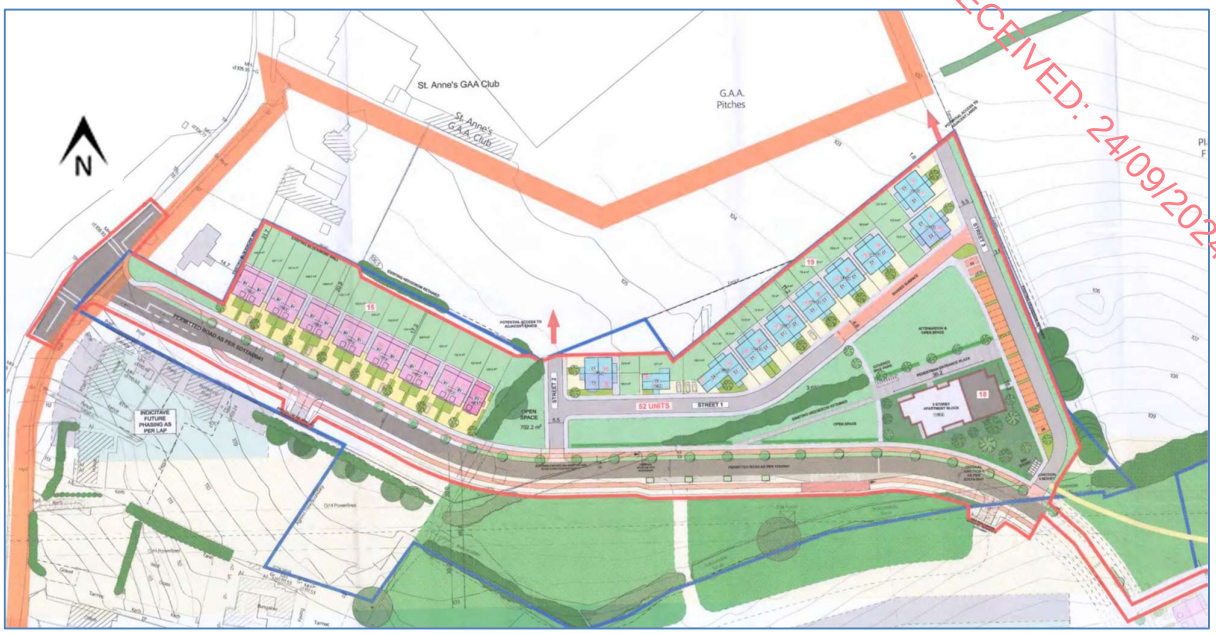

Fig. 3.6 – Previous site layout plan, refused under Ref. SD19A/0138

Located in the centre of the subject site (in part of the now proposed Neighbourhood Zone 1), permission was sought for a residential development comprised of 46 no. dwellings, under Ref. SD19A/0139. It should be noted that matters relating to the delivery of the previously permitted Main Link Street were cited as one of the reasons to refuse permission, along with matters relating to design and density. The site layout plan proposed under Ref. SD19A/0139 is illustrated in Fig. 3.7 below.

Fig. 3.7 – Previous site layout plan, refused under Ref. SD19A/0139

Located in the centre of the subject site (in the now proposed Neighbourhood Zone 2), permission was sought for a residential development comprised of 73 no. dwellings, under Ref. SD19A/0137. It should be noted that matters relating to the delivery of the previously permitted Main Link Street were cited as one of the reasons to refuse permission, along with matters relating to design and density. The site layout plan proposed under Ref. SD19A/0137 is illustrated in Fig. 3.8 overleaf.

Fig. 3.8 – Previous site layout plan, refused under Ref. SD19A/0137

Permission is now sought for a comprehensive LRD including the delivery and completion of the proposed east-west main link street connection Oldcourt Road to Bohernabreena Road.

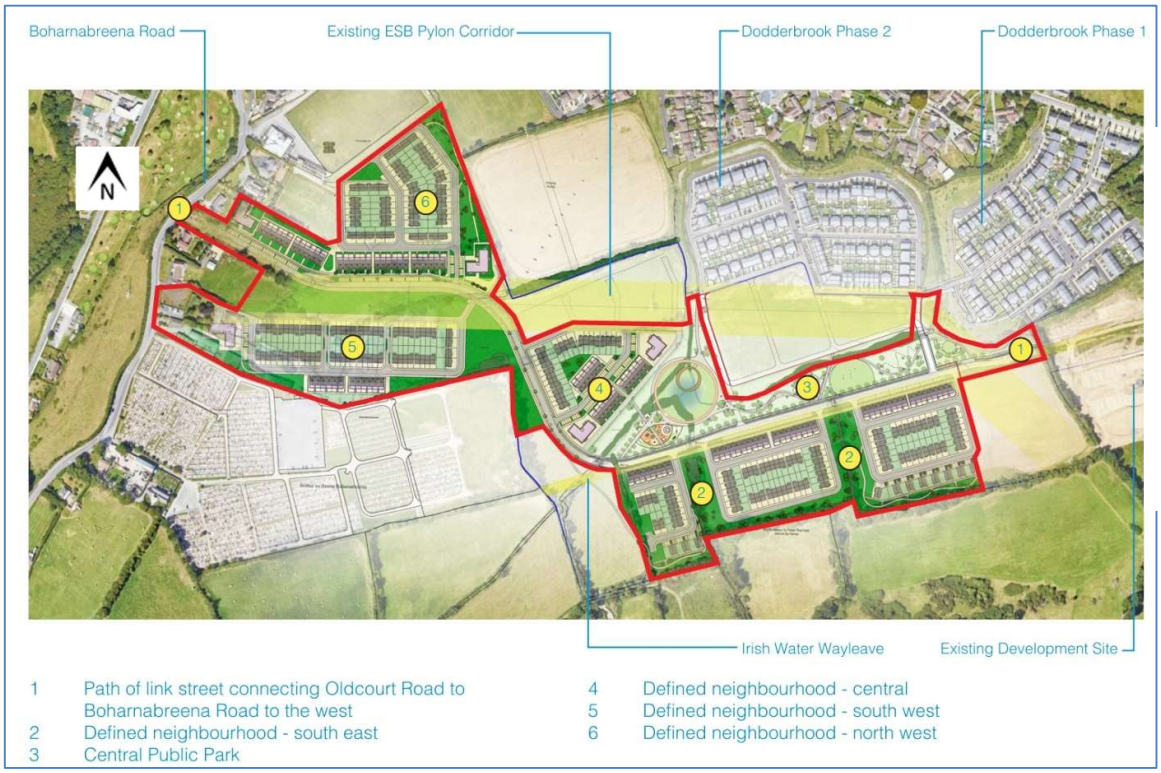

Fig. 3.9 - Earlier alterative design layout as discussed at S.247 pre-planning meeting with Planning Authority on 30th June 2023

The layout illustrated in Fig. 3.9 above was discussed with the Planning Authority at the S.247 pre-planning consultation stage in June 2023.

These considerations have informed the consideration of alternative layouts, dwelling mix, density, designs, open space provision, the layout of the proposed roads/streets through the subject site and connections to adjoining lands, addressing the issues of population and human health, biodiversity, archaeology and traffic and access arrangements.

The layout now put forward for permission has also been informed by the feedback received via pre-planning consultation meetings held with the SDCC Planning Department under Section 247 of the Planning and Development Act, 2000 (as amended). A series of meetings have been held with the Council's Parks and Roads Departments on the substance of the proposed development, particularly the approach to landscaping, proposed Oldcourt Park, incorporation of SUDs proposals and protection of hedgerows, and the design of the proposed east-west main link street.

The outcome of the various aforementioned meetings has been carefully considered, taken on board and incorporated into the development proposal that that subsequently submitted to SDCC for the Stage 2 LRD meeting for pre-application consultation. Figure 3.8 overleaf details the layout submitted to SDCC at pre-application consultation stage.

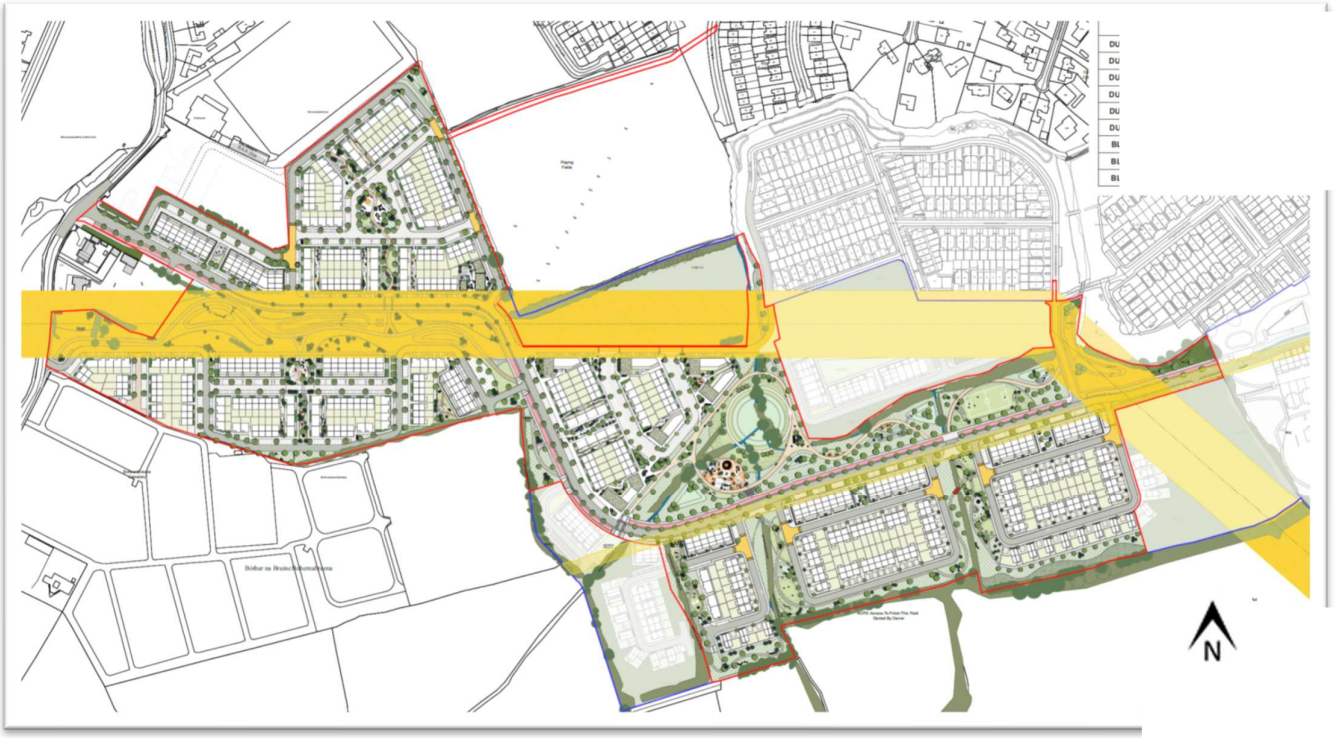

Fig. 3.10 - Layout submitted to SDCC for the Stage 2 LRD for pre-application consultation meeting, 1st March 2024

Insofar as the EIA is concerned, a number of iterations of the site layout and alternative designs were prepared and considered for the project. This involved taking into account the various technical and environmental considerations which are addressed in the EIA and which informed the design of the proposed development.

The design process, having taken into consideration the discussions held with SDCC, individual consultants who inform the chapter of this EIAR, and the feedback received from the Planning Authority (SDCC) at the Pre-Application Consultations, has resulted in the layout now put forward for permission. It is considered that this layout represents the best utilization of these zoned lands, complies with the objectives for the lands contained in the CDP and LAP and mitigates against significant environmental impacts.

In summary, the development proposal will, *inter alia*:

- Comply with the land-use zoning designations for the subject site;
- Provide appropriate accommodation which can cater for different life stages by delivering a variety of 1, 2, 3 & 4 bedroom housing typologies;
- Provide an appropriate density of development;
- Comply with the Planning Authority's detailed quantitative standards for residential development as set out in the existing SDCC CDP and, where appropriate, Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023);
- Provide a level of social and affordable housing (96 no. units) with equates to a mix of 10% and 20% of the overall quantum of proposed dwellings, as appropriate;
- Support sustainable transport modes via the creation of pedestrian and cycle connections;
- The proposed development also provides a creche (457m^2);
- Protect the existing residential amenity enjoyed by the residents of neighbouring developments;
- Preserve, where feasible, the natural amenity characteristics of the site, and provide for new features where necessary in order to ensure that the visual impact of the development is minimised. This has been achieved by allocating areas of open space for recreation, all of which will be developed in accordance with the overall Landscape Plan for this proposed development.

South Dublin County Council LRD Opinion (Ref. LRDOP001/24)

Subsequent to the Stage 2 LRD meeting with SDCC on 1st March 2024, SDCC issued their LRD Opinion on 28th March 2024, setting out details regarding the specific information to be either addresses/reconsidered and / or included as part of a LRD planning application. Such matters included:

- *The density of the development should be increased in line with the 40 – 80 dph density range for City – Suburban/Urban Extension sites as specified in the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities, 2024.*
- *Reduction in the level of perpendicular car parking provided along the link road. Car parking should be relocated off the link road, within residential blocks. Perpendicular parking may be acceptable.*
- *Amendments to the design of the link road in accordance with the Cycle Design Manual and DMURS, in particular to provide a two-way cycle track continually through the site on one side of the road and to provide lay-by bus stops.*
- *Reduction in the fragmentation of hedgerow by ensuring all hedgerow is maintained in public open space areas and reconfiguration of pathways to minimise impacts to existing hedgerow. Revision to design of Oldcourt Park to minimise impacts to existing hedgerow. Hedgerow should not be provided in any private open space areas and should not form the site boundary of any single dwelling.*

- *Additional connections to adjoining lands should be sought, in particular pedestrian and cycle links and an additional route through 'OS' lands connecting to Ely View. Details of all connections should be provided, to confirm connectivity of all routes and a permeability map should be submitted.*
- *Flow route analysis and conveyance plan required to inform SuDS strategy at the site which maximises above ground, natural, attenuation.*
- *Engage directly with Water Services to agree proposals relating to the diversion of the 450mm surface water sewer.*

Following the receipt of detailed feedback from the Planning Authority, during the course of the Stage 2 pre-application meeting, and following receipt of the LRD Opinion, which advised on further consideration relating to aspects of the proposed development, the applicant and design team have undertaken a number of revisions to the development proposal which is reflected within the final development proposal submitted for permission as part of a LRD planning application.

As noted within the development description sections of this chapter, the scheme now comprises a quantum of residential development consisting of 523 no. dwellings.

The key changes proposed related to, *inter alia*:

- Ensuring a minimum density of 40 units per hectare is achieved,
- Changes to the mix of dwelling types,
- Revisions to car parking layouts and location
- Retention of hedgerows etc in open spaces, particularly Oldcourt Park
- Updates to design and function of open spaces.

Responses to each of these items have been provided as part of the LRD planning application pack, and the scheme has been updated and improved where necessary as a result.

With regard to the layout put forward for permission, the iterative process included alternative site layouts that were considered with the objective of submitting an overall high-quality designed scheme which has undergone a robust consideration of relevant alternatives in reference to the comparison of environmental effects and meets the requirements of the EIA Directive, based on the multidisciplinary review across all environmental topics.

The final design now put forward for permission presents the most effective utilization of this site whilst also fulfilling the objectives of the Planning Authority and providing for long term, sustainable housing for which there is a considerable demand at present and providing for a use of material, architectural form and colour to create a high level of visual amenity.

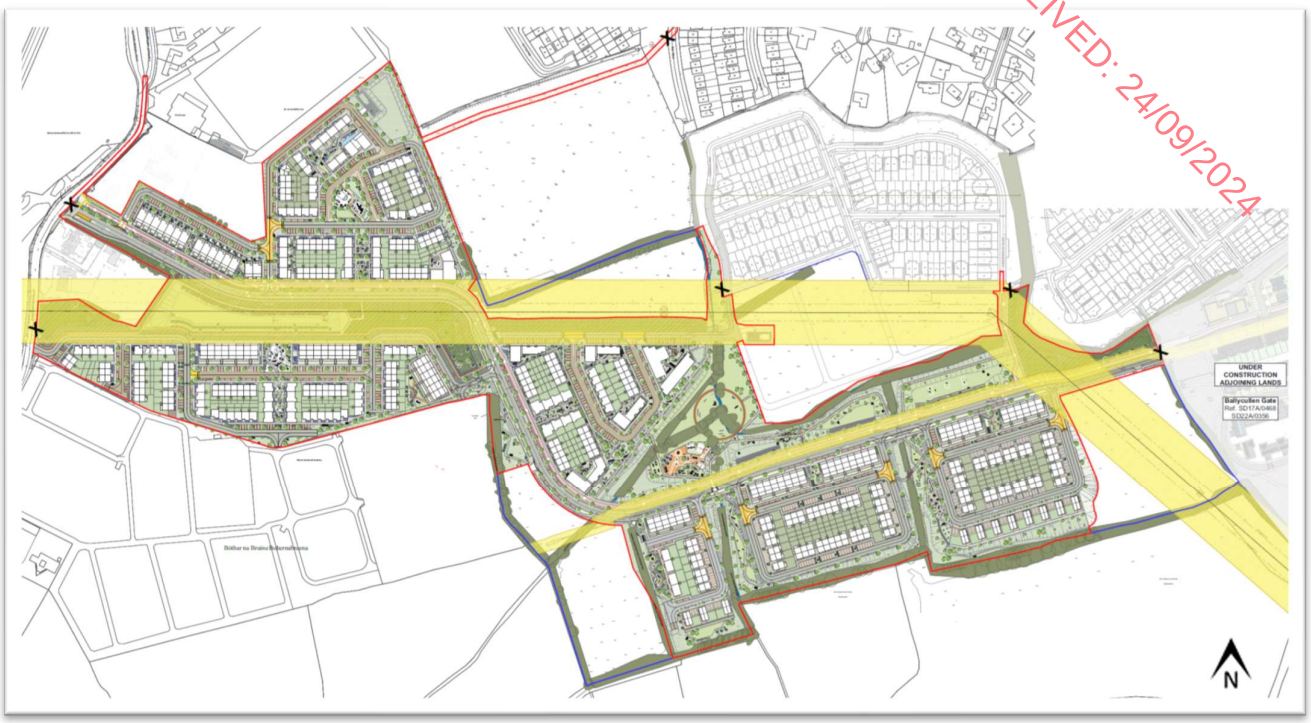

Fig. 3.11 –Site Layout Plan being put forward for permission as a LRD proposal

The proposed development takes into account all effects raised with respect to the pre-application design submitted to SDCC, and within their LRD Opinion (Case Reference LRDOP001/24) and provides for a sustainable development that has been optimised to emphasise positive environmental effects whilst reducing negative environmental impacts wherever possible.

The main consideration has been to achieve a design solution for the preferred layout which would enable all of the functional and operational requirements of the scheme to be met, whilst also ensuring the sensitive siting of new elements within the site. Having established the quantum, type and mix of residential units, a series of alternatives were considered by the design team. This process has enabled the final LRD proposal to evolve. The need to provide for an appropriate level of density, building height in terms of the locational context of the site, the incorporation of SUDs proposals throughout, the delivery of the east west main link street, retention of hedgerows / biodiversity etc. has driven the final layout form and design solution as proposed as part of the LRD planning application.

Alternative locations for the various built elements of the development were considered and examined at the design stage.

3.21.5. Alternative Processes

This is a residential / urban development and therefore there are no alternative processes to be considered.

3.22. The "Do Nothing" Scenario

The "*Do Nothing"* Scenario describes the impacts of the proposed development, if it were not carried out. The positive benefits to the national, regional and local community arising from the development of this site would not materialise in the *"Do Nothing"* scenario. In addition, the *"Do Nothing"* scenario would result in non-compliance with the NPF which contains the following relevant objectives:

- **National Policy Objective 3a** - Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements;

- **National Policy Objective 32** - To target the delivery of 550,000 additional households to 2040.

The alternative is leave the subject lands undeveloped thus not realising national policy to deliver more homes and not being an efficient use of zoned lands.

3.23. The *"Do Minimum"* Scenario

The *"Do Minimum"* Scenario could involve the construction of the subject site at the minimum density prescribed in the LAP for this area, i.e. net residential density of a minimum of 12 units per hectare up to a maximum of 38 no. dwellings per hectare. As outlined in the Planning Statement which accompanies the application the net developable area is c. 12.43 hectares which would result in a minimum development of approximately 149 no. dwellings and a maximum of 472 no. dwellings. However, the current proposal is supported by national and local planning policy to provide housing and intensify land use through increased densities. The CDP supports higher densities in appropriate areas in line with the standards set out in the CDP, which promotes higher residential densities at appropriate locations and to ensure that the density of new residential development is appropriate to its location and surrounding context. This approach is consistent with, and has been informed by the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, 2024.

Alternatively, the *"Do Minimum"* scenario could involve the construction of the application site via a number of individual planning applications. While this alternative may reduce the level of construction activity in the short term, it is considered that it would have the effect of spreading construction over a longer period of time and could result in incoherent development which will not deliver the objectives of the CDP. The *"Do-Minimum"* scenario would also result in reduced efficiencies in construction and delays.

3.24. The "*Do Maximum"* Scenario

The *"Do Maximum"* Scenario could involve the construction of the entire site in one phase of development i.e. circa 523 no. residential units. This would involve a greater degree of disruption to the receiving environment in the short term. This alternative was discounted on the basis of practical considerations relating to phasing of development, funding and feasibility.

3.25. Conclusion on Assessment of Alternatives

Based on the foregoing, it is considered that all reasonable alternatives to the proposed development were considered and no alternatives have been overlooked which would significantly reduce or further minimise environmental impacts.

3.26. The Existence of the Project

Pursuant to the EIA Directive, an EIAR document is required to set out a description of the project processes, activities, materials and natural resources utilised; and the activities, materials and natural

resources and the effects, residues and emissions anticipated by the operation of the project.

The proposed development is a residential development including associated site development works, a creche, and areas of open space. The primary, direct, significant environmental effects will arise during the construction stage. As a result, post-construction, the operation of the proposed development is therefore relatively benign and not likely to give rise to any significant additional impacts in terms of activities, materials or natural resources used or effects, residues or emissions which are likely to have a significant impact on population and human health, biodiversity, soils, water, air, climate, or landscape.

The primary likely and significant environmental impacts of the operation of the proposed development are fully addressed in this EIAR document; and relate to Population and Human Health, Landscape and Visual Impact and Noise and Air impacts associated with the traffic generated.

The proposed development also has the potential for cumulative, secondary and indirect impacts particularly with respect to such topics as traffic – which in many instances – are often difficult to quantify due to complex inter-relationships. However, all cumulative secondary and indirect impacts are unlikely to be significant; and where appropriate, have been addressed in the content of this EIAR document.

3.26.1 Description of Changes to the Project

Guidelines on the information to be contained in environmental impact assessment reports were published by the EPA in 2022.

The guidelines state in relation to change:

"Very few projects remain unaltered throughout their existence. Success may bring growth; technology or market forces may cause processes or activities to alter. All projects change and- like living entities - will someday cease to function. The life cycles of some types of projects, such as quarries, are finite and predictable. Such projects often consider their closure and decommissioning in detail from the outset, while for most projects a general indication of the nature of possible future changes may suffice. While the examination of the potential consequences of change (such as extension) does not imply permission for such extension, its identification and consideration can be an important factor in the determination of the application.

Descriptions of likely changes may cover:

- *Extension*
- *Decommissioning*
- *Other Changes."*

As per the EPA guidelines and in the interests of proper planning and sustainable development, it is important to consider the potential future growth and longer-term expansion of a proposed development in order to ensure that the geographical area in the vicinity of the proposed development has the assimilative carrying capacity to accommodate future development.

Given the proposed site layout extent, the limitations of physical boundaries and adjoining land uses, the potential for growth of the proposed development is considered limited and confined which will have a negligible impact.

The parameters for the future development of the area in the vicinity of the subject site are governed by the CDP. The future (re)development of adjacent lands will be the subject of separate land use zoning and planning applications in the future, where they are identified as being suitable for development, and where

the provision of the requisite physical and other infrastructure is available

3.26.2 Description of Secondary and Off-Site Developments

No significant secondary enabling development is deemed necessary to facilitate the proposed development. The planning application includes details of the necessary road works, which are required to facilitate this development. These works are assessed within this Environmental Impact Assessment Report.

3.26.3 Risks of Major Accidents and/or Disasters

The surrounding context consists of a mix of residential, agricultural, employment, educational and open space public amenity lands. It does not include any man-made industrial processes (including SEVESO II Directive sites (96/82/EC & 2003/105/EC) which would be likely to result in a risk to human health and safety.

In accordance with Article 3(2) and Annex IV of the 2014 EIA Directive, the vulnerability of the project to risks of major accidents and/or disasters is considered, and the implications for likely significant effects on the environment if it did occur.

Article 3(2) of the 2014 EIA Directive states that an EIAR shall consider:

'The effects referred to in paragraph 1 on the factors set out therein shall include the expected effects deriving from the vulnerability of the project to risks of major accidents and/or disasters that are relevant to the project concerned'.

An EIAR should also contain the following information prescribed in 5(d) of Annex IV of the 2014 EIA Directive:

> *5. "A description of the likely significant effects of the project on the environment resulting from, inter alia:*
> *….*
> *(d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);"*

The 2018 Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment sets out two key considerations to address this:

- *"The potential of the project to cause accidents and/or disasters, including implications for human health, cultural heritage, and the environment;*

- *The vulnerability of the project to potential disasters/accidents, including the risk to the project of both natural disasters (e.g. flooding) and man-made disasters (e.g. technological disasters)."*

(Source: Page 31, Section 4.29)

During the construction phase the risk of accidents and/ or disasters arise from the potential for construction accidents are addressed under Health and Safety Regulations and other codes. Insofar as they are relevant to the planning and EIA process, mitigation measures that will prevent and/ or mitigate the significant effects are identified.

During the operational phase the risk of fire related accidents is similarly addressed through the Building Regulations (Fire Safety) and is therefore addressed through primary mitigation in the design process. Residual risks of fire and road traffic accidents will be managed by emergency services as per their standard procedures.

The risk of flooding and vulnerability of the project is addressed in the Site Specific Flood Risk Assessment (SSFRA) submitted with the planning application documentation. Adherence to best practice and "proper planning and sustainable development" principles means these risks are reduced to an acceptable level, whereby the risk is unlikely and unexpected as a result, and further assessments within the EIA process are not necessary.
Otherwise, in terms of the project, no other major accidents or disasters are considered to give rise to effects that are 'likely' and 'significant'.

3.27. Construction Phase

The Construction Phase would be expected to commence in Q2 2025, and accordingly, the projected completion of the buildings by Q2 2032.

The Outline Construction Management Plan (CMP), the Outline Construction Traffic Management Plan and the Resource & Waste Management Plan (R&WMP), which are included with this planning application, should be referred to for more detail on the Construction Phasing and Environmental Measures associated with same. The appointed Contractor will prepare a detailed final CMP, including detailed construction phasing and a Traffic Management Plan (TMP).

3.28. Description of the Operational Phase

The proposed development consists of 523 no. dwellings comprised of residential houses, apartments and duplex units ranging in height from 2 to 3-4 storeys. The proposed development also includes for a 2 storey crèche / childcare facility.

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

3.29. Related Development and Cumulative Impacts

The proposed development also has the potential for cumulative, secondary and indirect impacts particularly with respect to such topics as traffic which in many instances are often difficult to quantify due to complex inter-relationships. However, all cumulative, secondary and indirect impacts are unlikely to be significant and, where appropriate, have been addressed in Chapter 16 (Interactions) and the cumulative impacts are fully addressed in the relevant specialist Chapters of this EIAR.

Each Chapter of the EIAR includes a cumulative impact assessment of the proposed development with other planned projects in the immediate area. The potential cumulative impacts primarily relate to traffic, dust, noise and other nuisances from the construction of the development, with other planned or existing projects, and each of the following EIAR chapters has regard to these in the assessment and mitigation measures proposes.As such, with the necessary mitigation for each environmental aspect, it is anticipated that the potential cumulative impact of the proposed development in conjunction with the other planned developments will be minimal.

Part B – Effects on the Environment

4.0. Population and Human Health

4.1. Introduction

This chapter of the EIAR provides an assessment of the potential impacts of the development proposal on human beings, population, and human health within the vicinity of the application site and an assessment of these issues.

Issues associated with population and human health are varied and cover a broad spectrum of topics associated with the existence, activities and wellbeing of people as groups. Whilst most developments will affect people in some form or way, this chapter of the EIAR focuses on those topics which are manifested in the environment, such as demographic change, impacts on community facilities, on the economy, and on indicators of human health. Actual and perceived impact of the proposed development on population and human health may also arise from a number of elements of the proposal. These impacts are dealt with throughout the EIAR, and in particular, the following chapters:

- Chapter 6: Land, Soil and Geology;
- Chapter 7: Water;
- Chapter 8: Air Quality
- Chapter 9: Climate;
- Chapter 10: Noise;
- Chapter 11: Material Assets: Built Services;
- Chapter 12: Material Assets: Traffic and Transport;
- Chapter 13: Material Assets: Resource & Waste Management;
- Chapter 15: The Landscape.

The EIA Directive updated the list of topics to be addressed in an EIAR and has replaced '*Human Beings*' with '*Population and Human Health'*. The term '*human health'* is not defined in the 2014 EIA Directive; however, the European Commission (EC) *Guidance on the Preparation of the Environmental Impact Assessment Report (Directive 2011/92/EU as amended by 2014/52/EU)* (2017) states that:

"Human health is a very broad factor that would be highly Project dependent. The notion of human health should be considered in the context of other factors in Article 3(1) of the EIA Directive and thus environmentally related health issues (such as health effects caused by the release of toxic substances to the environment, health risks arising from major hazards associated with the Project, effects caused by changes in disease vectors caused by the Project, changes in living conditions, effects on vulnerable groups, exposure to traffic noise or air pollutants) are obvious aspects to study. In addition, these would concern the commissioning, operation, and decommissioning of a Project in relation to workers on the Project and surrounding population" (p. 37).

The EPA *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* (2022) state that:

"In an EIAR, the assessment of impacts on population and human health should refer to the assessments of those factors under which human health effects might occur, as addressed elsewhere in this EIAR e.g. under the environmental factors of air, water, soil etc." (p. 28)

This Chapter also meets the requirement for assessment of '*Human Beings'* as per Schedule 6 of the Planning and Development Regulations, 2001 (as amended).

This Chapter has been prepared by Armstrong Fenton Associates Planning Consultants (Tracy Armstrong, BA, MRUP, MIPI, MRTPI).

4.2. Assessment Methodology

The assessment involved a desktop study of census information, divided into State, County, Town and District Electoral Division (DED) level where possible. While the primary focus of this EIAR is the lands located within the immediate vicinity the development proposal i.e. the Ballycullen - Oldcourt LAP lands, Census statistics at a DED level have been used to assess the effects on the existing population as the DED level data generally provides the most accurate picture of existing population in the vicinity of a development. The proposed development lies within Bohernabreena DED, as shown in Figure 4.1, with the 2022 Census declaring the total population of the Bohernabreena DED as 5,672 persons.

Based on this study, it was possible to consider the presence, importance and sensitivity of the population and the potential likely significant impacts on both the local and wider community. Based on these sources, the assessment involved a desk study of a range of planning and other sources. A profile of the residential communities adjacent to the proposed development is presented under the following headings:

- Land Use/ Settlement Patterns;
- Population Growth;
- Socio-economic Profile;
- Community Facilities;
- Movement and Transportation.
- Landscape and Visual
- Human Health

Chapter 1 of this EIAR noted the likely environmental effects which were assessed at a Strategic Level as part of the CDP. The public was consulted in the making of the CDP, and their views taken into account by SDCC in finalising and adopting the CDP.

This assessment has been carried out in accordance with the following guidance, and tailored accordingly based on professional judgement:

- EPA (2022). *Guidelines on the Information to be Contained in Environmental Impact Statements*;
- EPA (2015). *Advice Notes on Current Practice in the Preparation of Environmental Impact Statements*;
- IEMA (2017). *Health in Environmental Impact Assessment: A Primer for a Proportionate Approach*.

Perceptions of the proposed development are subjective; however, it is considered that the impacts presented are representative of the impacts on the majority of those residing/working within the study area.

4.2.1. Significance of Impacts

In line with the EPA's "*Guidelines on the Information to be Contained in Environmental Impact Assessment Reports"* (EPA, 2022); seven generalised degrees of impact significance are used to describe impacts as detailed in Table 4.1 over:

Significance of Effect	Definition
Imperceptible	An effect capable of measurement but without significant consequences
Not significant	An effect which causes noticeable changes in the character of the environment but without significant consequences
Slight	An effect which causes noticeable changes in the character of the environment without affecting its sensitivities
Moderate	An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends
Significant	An effect which, by its character, magnitude, duration or intensity alters a sensitive aspect of the environment
Very Significant	An effect which, by its character, magnitude, duration or intensity alters most of a sensitive aspect of the environment
Profound	An effect which obliterates sensitive characteristics

Table 4.1 Definition of Significance of Effects

In addition, the following terms detailed in Tables 4.2 & 4.3 are defined when quantifying the quality of effects and the duration and frequency of effects.

Quality	Definition
Positive Effects	*A change which improves the quality of the environment*
Neutral Effects	*No effects or effects that are imperceptible, within normal bounds of variation or within the margin of forecast error*
Negative / Adverse Effects	*A change which reduces the quality of the environment*

Table 4.2 Definition of Quality of Effects

Quality	Definition
Momentary Effects	Effects lasting from seconds to minutes
Brief Effects	Effects lasting less than a day
Temporary Effects	Effects lasting less than a year

Short-Term Effects	Effects lasting one to seven years
Medium-Term Effects	Effects lasting seven to fifteen years
Long-Term Effects	Effects lasting fifteen to sixty years
Permanent Effects	Effects lasting over sixty years
Reversible Effects	Effects that can be undone, for example through remediation or restoration

Table 4.3 Definition of Duration of Effects

4.3. Characteristics of Proposed Development

The development proposal is described in detail in Section 1.2 of this EIAR. The development proposal comprises of, *inter alia*, 523 no. residential dwellings, a 2 storey creche (c.457m²).

The development will consist of 655 no. dwellings, comprised of 255 no. 2, 3 & 4 bed, 2 & 3 storey, detached, semi-detached and terraced houses, 206 no. 1, 2 & 3 bed duplex units in 20 no. 2 & 3 storey blocks, and 62 no. 1, 2 & 3 bed apartments in 4 no. 2-3 & 3-4 storey blocks.

Private amenity space for the residential units is provided in the form of rear gardens for houses and ground floor terraces / upper floor balconies for apartments and duplex units. The proposed development provides for a total of c. 7.37Ha of public open space, and c. 5,545sq.m of communal open space associated with proposed residential units.

Vehicular access to the development will be via 4 no. access points, as follows: (i) from the west of the site via 2 no. accesses located off Bohernabreena Road, (ii) from the north of the site via 1 no. access at Dodderbrook Place, and (iii) from Oldcourt Road (the R113) to the east, via adjoining residential development at Ballycullen Gate. The proposed development includes for pedestrian and cyclist connections and accesses throughout the proposed development and to adjoining lands to the north at Dodderbrook Avenue and to the north-west into St. Anne's GAA club.

The proposed development includes the demolition of all existing structures on site, including 2 no. single storey dwellings and outbuildings/sheds (total demolition area: c. 4,152.06m²).

The proposed development provides for (i) all associated site development works above and below ground, including 2 no. underground foul sewerage pumping stations, (ii) public open spaces (c. 7.37Ha), (iii) communal open spaces (c. 5,545sq.m), (iv) hard and soft landscaping and boundary treatments, (v) surface car parking (700 no. car parking spaces, including EV parking), (vi) bicycle parking (1,267 no. bicycle parking spaces), (vii) bin & bicycle storage, (viii) public lighting, and (ix), plant / PV panels (M&E), utility services & 5 no. ESB sub-station/kiosks, all on an overall application site area of c.20.4Ha.

4.4. The Existing Receiving Environment (Baseline Situation)

4.4.1. Introduction

A description of the relevant aspects of the current state of the environment (baseline scenario) in relation to population and human health is provided below.

The existing environment is considered in this section under the following headings:

- Land-Use Planning / Settlement Patterns;
- Population Growth;
- Socioeconomic Profile;
- Community and Outdoor Facilities;
- Movement and Transport;
- Human Health.

4.4.2. Study Area

The subject site measures c.20.4 hectares and is in the townlands of Bohernabreena, Oldcourt and Killininny, Dublin 24, and within the lands designated for the Ballycullen-Oldcourt Local Area Plan, 2014, (as extended). The application site also lies within the boundary of the Ballycullen-Oldcourt Local Area Plan (2014, as extended) lands (hereafter "Plan lands") which stretch across the foothills of the Dublin mountains, forming a buffer between the mountains and the existing suburban areas of Tallaght, Firhouse and Knocklyon.

The Plan lands are bounded to the west by Bohernabreena Road, to the east by the M50, to the north by existing suburban development, including for the Allerton, Ely, Beechdale, Hunters Wood, Woodstown, and Dalriada estates, and to the south by the foothills of the Dublin mountains. With their mountainous backdrop, the Plan lands are generally semi-rural in setting; however, they also benefit from views of the suburban and urban hinterland. The prevailing development in the immediate vicinity is generally comprised of two and three storey housing.

The subject site is located to the east of Bohernabreena Road (L7114) and north and east of Bohernabreena cemetery, south/south-east of St. Anne's GAA club, south of the Dodderbrook residential estate, west of the Ballycullen Gate residential development (currently under construction under Planning Ref.s SD17A/0468 & SD22A/0356) and west of Oldcourt Road (the R113).

The site has no inhabitants but is bounded by existing residential developments to the north (Dodderbrook) and long-established housing at Oldcourt Cottages and Ely further north, as well as individual dwellings along the Bohernabreena Road to the west. To the south are greenfield / agricultural lands. The area of the application site is approximately 20.4Ha, slightly irregular in shape.

The primary focus of this EIAR are the lands in the immediate vicinity of the application site. The development site is contained within the Bohernabreena DED. A DED is the smallest area for which Census statistical data is published and therefore provides a detailed analysis of population fluctuations and demographic trends. For purpose of this EIAR the study area is therefore Bohernabreena DED.

Sensitive receptors include neighbouring landowners, local communities and other parties which are likely to be directly affected by the project. In particular homes, hospitals, hotels, schools, community facilities and commercial premises are noted. Regard is also given to transient populations including drivers, tourists and walkers.

The sensitive receptors impacted upon by Air Quality, Noise and Visual effects are identified in the relevant Chapters of this EIAR (Chapters 8, 10 and 15 respectively). The existing receptors specifically relevant to this Chapter include:

- The residents of Dodderbrook, Ely and Oldcourt Cottages residential estates;
- Users of St. Anne's GAA club grounds to the north;
- Residents along Bohernabreena Road.

Future receptors will be the residents of the proposed development and the adjoining permitted developments that are being constructed to the immediate east (Planning Ref.s SD17A/0468, SD22A/0356, SD23A/0083).

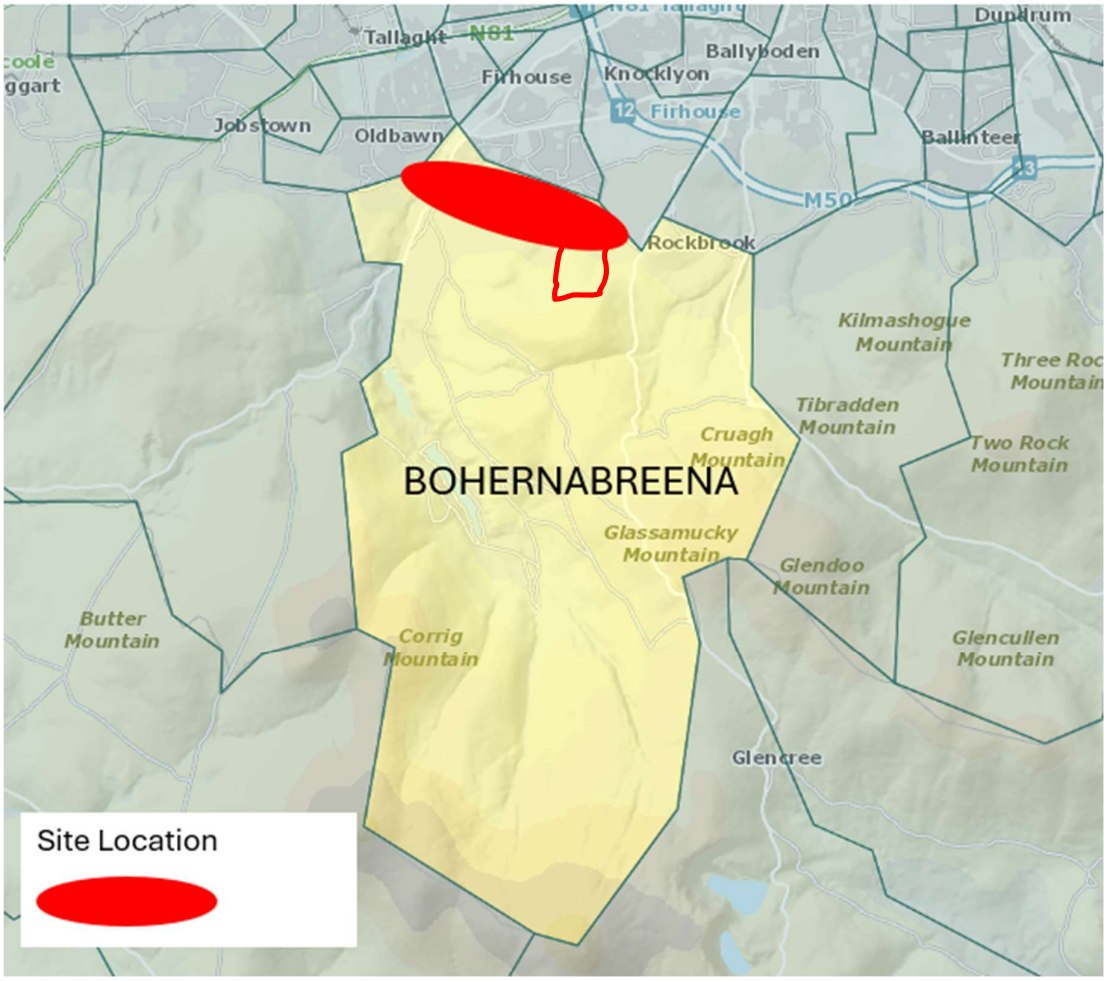

Fig. 4.2 – Bohernabreena DED (subject site in red)

4.4.3. Land Use Planning/Settlement Patterns

The project site is large, greenfield site zoned for residential use. Within the study area, the existing settlement pattern provides for a varied mix of uses primarily including residential, educational, open space and agricultural.

Residential uses occupy the largest proportion of the Study Area, i.e. the Ballycullen – Oldcourt LAP area. Recreational uses are in the form of the St. Anne's GAA club to the north and Gunny Hill playing pitch to the east. Agricultural lands are to the south.

Within the study area, the existing settlement pattern provides for a varied mix of uses including residential, educational, open space and agricultural uses. Residential and proposed residential uses occupy the largest proportion of the study area. Education and open space uses also permeate the study area.

4.4.4. Population Change

For the purposes of population evolution and growth forecasting, this EIAR has examined Census results from both the 2016 and 2022 Census in terms of the State, County and Local Level i.e. both the catchment area of South Dublin and the Bohernabreena DED. The Study Area for the purposes of this methodology is therefore the Bohernabreena DED.

The Bohernabreena DED experienced increase in population between 2016 and 2022 with the population increasing by 4,496 persons from 2016 to a total population of 5,672 persons in 2022. This equates to a increase of circa 20% for the study area over the five year period.

Please refer to Table 4.4 below for details of population changes at State, County and Local Level from 2016 to 2022.

	2016 Population	2022 Population	Actual Change	% Change
State	4,761,865	5,149,139	387,274	7.5%
South County Dublin	278,767	301,075	22,308	7.4%
Bohernabreena DED	4,496	5,672	1,176	20%

Table 4.4 - Population Change at State, County and Local Level 2016-2022

There has been a 20% population change in the Bohernabreena DED between 2016 and 2022.

In addition to the resident population, there is also a significant working population within the study area.

4.4.5. Socioeconomic Profile

The socio economic profile of the study area is presented using 2016 and 2022 Census data under the headings of household formation, age profile, dependant age cohorts (0-14 and 65+ years), the working age group (15-64 years) and the 25-44 age cohort.

4.4.5.1. Household Formation

The 2022 Census results state that the total number of households in the study area was 1,417. This is an increase of 310 no. dwellings (21% change) from the 2016 Census.

The average household size for the State as a whole was 2.74 persons in 2022 with county Dublin having average household size of 2.97. Based on the above, the study area has a generally consistent household size when compared with both the State as a whole and county Dublin.

4.4.5.2. Age Profile

This section provides a comparative demographic breakdown of the study area with Bohernabreena DED, South Dublin and the State. For the purposes of analysing the receiving environment, three factors will be examined:

(i) the dependant population (i.e. those persons within the 0-14 and 65+ age cohorts)

(ii) the working/independent population (i.e. those persons residing in the 15–64 year age cohorts) and

(iii) those persons within the family formation age cohorts, aged 25-44

Tables 4.5 & 4.6, below, detail the demographic breakdown of the Bohernabreena DED, South Dublin and the State from both the 2016 and 2022 Census.

	0-14 years	15-24 years	25-44 years	45-64 years	65+ years	Total Population
State	1,006,552	576,542	1,406,291	1,135,003	637,567	4,761,865
South Dublin	64,088	34,147	87,539	62,068	30,925	278,767
Bohernabreena	1,133	519	1,357	1,042	445	4,496

Table 4.5 Age Profile at State, County and Local Level 2016

	0-14 years	15-24 years	25-44 years	45-64 years	65+ years	Total Population
State	1,012,287	644,771	1,422,424	1,293,342	776,315	5,149,139
South Dublin	63,989	38,930	88,474	69,848	39,834	301,075
Bohernabreena	1,317	761	1,619	1,374	601	5,672

Table 4.6 Age Profile at State, County and Local Level 2022

Tables 4.7 & 4.8, below, detail the percentile of each age cohort in the Bohernabreena DED, South Dublin and the State from both the 2016 and 2022 Census.

	0-14 years	15-24 years	25-44 years	45-64 years	65+ years
State	21%	12%	30%	24%	13%
South Dublin	23%	12%	31%	22%	11%
Bohernabreena	25%	12%	30%	23%	10%

Table 4.7 Age Profile as percentile at State, County and Local Level 2016

	0-14 years	15-24 years	25-44 years	45-64 years	65+ years
State	20%	13%	28%	25%	15%
South Dublin	21%	13%	29%	23%	13%
Bohernabreena	23%	13%	29%	24%	11%

Table 4.8 Age Profile as percentile at State, County and Local Level 2022

Figure 4.3, below, illustrates the demographic breakdown of age cohorts in the Bohernabreena DED, South Dublin and the State from both the 2016 and 2022 Census.

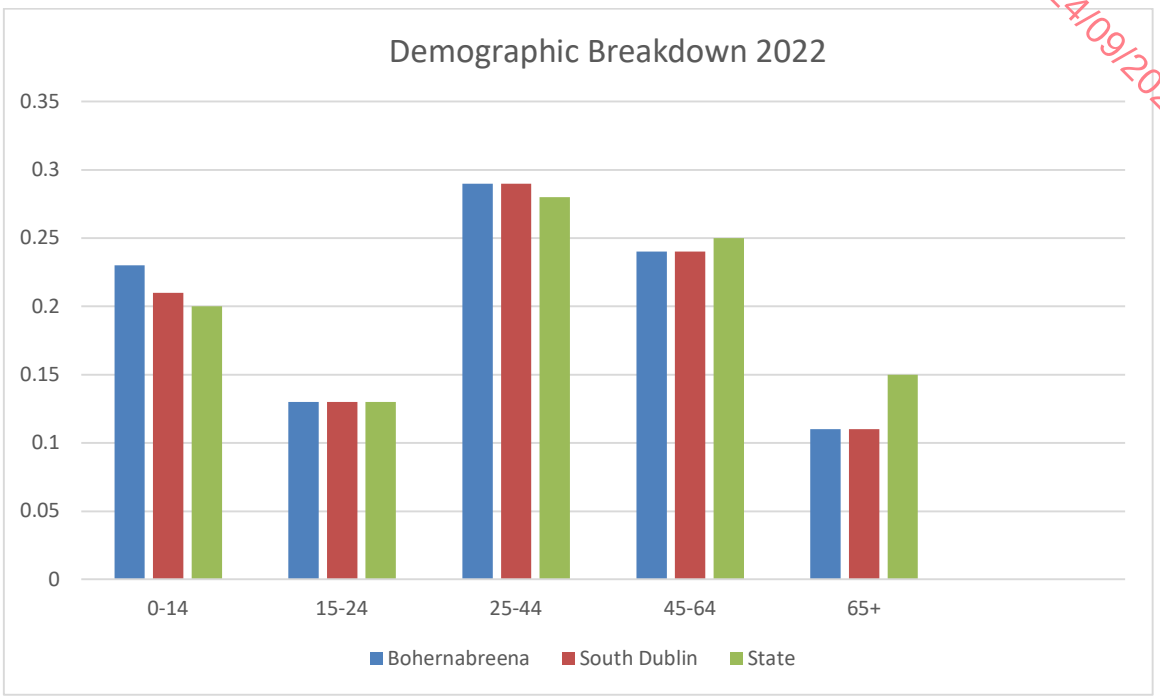

Figure 4.3 Age profile of the defined areas 2022

4.4.5.3. Dependant Age Cohorts (0-14 and 65+ years)

The proportion of dependants (aged 0-14 and 65+ years) within the study area (Bohernabreena DED) was recorded at 34% of the population in the 2022 Census. This is a slight 1% decrease from the 2016 Census results which recorded the age dependant cohort within the study area at 35%.

The proportion of dependants (aged 0-14 and 65+ years) for the State as a whole was recorded at 35% of the population in the 2022 Census. This is a slight increase from the 2016 Census results which recorded the age dependant cohort for the State at 34%

Based on the above, the study area (Bohernabreena DED) can be seen to be not following the national trend for an increase in the age dependant cohort. At the study level, the younger age group (0-14 years) represents the minority of the age dependant cohort (35% of the study area dependant age population and 34% of the State dependant age population).

These figures indicate that the study area has a slightly older population likely made of up older dependants than young families. It is evident that it is the 65+ age cohort that contributes most heavily to the dependant population, which has implications for the level and type of service provision across CDP area with a likely demand for retirement care facilities. However, it should be noted that the split of the dependant age cohorts is a 72 / 28 split and as such over the next decade the younger proportion of this age cohort will move into the working age groups and will likely increase pressure on future housing demands.

4.4.5.4 The Working Age Group (15-64 years)

The Working Age Group is defined as those persons residing within the 15-64 year age cohort. The majority of the population, in the area examined, resides within this age cohort, which again reflects the youthful population structure of the study area and the State as a whole.

The working age group demographic within the study area represented 66.52% of the population in the 2022 Census results. This is a slight decrease from the 2016 Census results which recorded the working age group demographic within the study area at 66.92%.

The working age group demographic for the State represented 65.3% of the population in the 2022 Census results 2. This is a slight decrease from the 2016 Census results which recorded the working age group demographic for the State at 65.5%.

Based on the above, the study area can be seen to be not following the national trend for a decrease in the working age cohort. Notwithstanding same, the high percentile of the working age group residing in the study area (66.52% of the population) has implications on demand for housing, services, etc. in order to service this population age, which the proposed development may contribute to satisfying this demand.

4.4.5.5. The 25-44 Age Cohort

The 25-44 age cohort is most likely to look to purchase a home, start a family and settle into a long-term community. It is therefore important to analyse this age cohort in particular as they will have the greatest impact on the social and economic conditions for the short and medium term, with regard to housing, employment and childcare facilities.

The 25-44 age cohort within the study area represented 29% of the population in the 2022 Census results. This is a slight decrease from the 2016 Census results which recorded the 25-44 age cohort within the study area at 31%.

The 25-44 age cohort for the State as whole represented 28% of the population in the 2022 Census results. This is a slight decrease from the 2016 Census results which recorded the 25-44 age cohort for the State at 30%.

For both the study area and the State the 25-44 age cohort represents the largest age demographic of the population. It is considered that the current demand for housing reflects the large percentage of this age cohort in the existing population. It is largely this age cohort that begins to have families and set up independent households, all of which has medium and long term social and economic implications and impacts on the demand for housing. The provision of housing for these group will also have an impact on workforce retention and therefore future economic growth of the area.

4.4.6 Community and Outdoor Facilities

The area is well served with a range of community facilities including medical, childcare and educational, community, sports and recreation and retail facilities. Facilities within the study area include 7 no. primary schools, 9 no. health and wellbeing providers, 20 no. sports and recreation facilities.

The study area also includes a number employment centres, i.e. the Tallaght Business Park and the Square Shopping Centre with a wide variety of business operating from there. Please refer to the Social & Community Infrastructure Assessment which accompanies the planning application for a complete list of said facilities and services.

4.4.7 Movement and Transport

4.4.7.1. Road Network

Vehicular access to the development will be via 4 no. access points, as follows: (i) from the west of the site via 2 no. accesses located off Bohernabreena Road, (ii) from the north of the site via 1 no. access at Dodderbrook Place, and (iii) from Oldcourt Road (the R113) to the east, via adjoining residential development.

4.4.7.2. Pedestrian & Cycle Network

The proposed development includes for pedestrian and cyclist connections and accesses to adjoining lands to the north, east and west, and includes for cycling and pedestrian routes and infrastructure throughout the development.

Dedicated off road cycle infrastructure has been provided through the development. This infrastructure links the Oldcourt Road with the Bohernabreena Road. It provides, as much as possible, a direct route from the access point on the Oldcourt Road to the Bohernabreena Road.

The site will be highly accessible to pedestrians with the opening up of the lands to the public realm, as opposed to the current gated, agricultural situation.

4.4.7.3. Public Transport

There are numerous bus operators providing a bus services locally and within walking distance to the site, notably the following bus services: No. 65B Poolbeg Street – Citywest, No. 175 Citywest-UCD, No. 15/15B Clongriffin – Ballycullen Road and No. 49 Pearse Street – Tallaght (The Square). The proposed development includes for the provision of 2 no. bus stops along the proposed east-west road link scheme. Based on feedback from the NTA, these bus stops will not be provided for in this application. Instead, the bus stops have been identified and allowed for their retrofitting across the footpath/cycle path at some point in the future, which will further aid a transition to more sustainable transport modes.

4.4.8. Landscape and Visual

The overall application site measures c. 20.3 hectares and is, in the majority, currently a greenfield site, with existing building (2 no. dwellings and sheds/outbuildings located in the south-west part of the site) located within an upcoming residential area. The site is irregular in shape.

A key feature of the landscape within the immediate environs is the rising nature of the landscape beyond the existing urban edge. This is relatively gentle at the urban edge but becomes steeper and more

pronounced to the south of the site. The site forms part of this more gently rising landform at the urban edge, and there is only around a 25m height difference between the lowest part of the application site (98m AOD) at the existing urban edge, and the most elevated part of the site (123m AOD).

As part of the subject application, a number of views (16 no.) have been taken from sensitive points where the site may be visible from third party lands – these are listed in Table 15.6 of this EIAR. Verified views have been prepared by Macroworks and are submitted in a separate document as part of this LRD planning application. In addition, Chapter 15 "*The Landscape*" of this EIAR takes into account the visual receptor sensitivity from the selected view locations.

4.4.9 Human Health

Health, as defined by the World Health Organization (WHO), is "*a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity*". The Healthy Ireland Framework 2013-2025 defines health as '*everyone achieving his or her potential to enjoy complete physical, mental and social wellbeing. Healthy people contribute to the health and quality of the society in which they live, work and play*'. This Framework also states that health is much more than an absence of disease or disability, and that individual health, and the health of a country, affects the quality of everyone's living experience.

Department of Health's 2019 report, *Health in Ireland – Key Trends 2023*, provides summary statistics on health and health care in Ireland over the past ten years. The report highlights the following key trends:

- Our birth rate might higher than many other countries in Europe, but the population under 15 is still projected to decrease by 13% between 2023 and 2043 by contrast, the number of over-65s is projected to increase by around 66%, with the number of over 85s more than doubling.
- Life expectancy at birth is 84.3 years for females and 80.5 years for males in 2021. Females who reach 65 can expect to live a further 21.8 years, with males living a further 19.2 years.
- Ireland has the highest self-perceived health status in the EU, with 80.0% of people rating their health as good or very good
- Mortality rates have declined 10.3% over the last decade. Age-standardised death rates for major causes of death such as cancers and circulatory system diseases have declined by c.17% and 25%, respectively, since 2013.
- Lifestyle factors such as smoking, drinking, levels of physical activity and obesity continue to be issues which have the potential to jeopardise many of the health gains achieved in recent years.

At the national level, population health presents a picture of decreasing mortality rates and high self-perceived health over the past ten years. Ireland has the highest self-perceived health status in the EU, with 80% of people rating their health as either 'good' or 'very good'. The number of people reporting a chronic illness or health problem is also better than the EU average, at around 29.5% of the population. However, health status reflects income inequality, with fewer low income earners reporting good health both in Ireland and across the EU. Infant mortality, measured as deaths per 1,000 live births, has also decreased by 8.5% since 2012 but increased by 14.1% between 2019 and 2021, so Ireland is now equal to the EU average; we had been below the EU average for the preceding decade.

Ireland is currently below the EU average for suicide rates – the three-year average for suicide mortality in Ireland was below the EU average up to 2020 (the latest year for which EU data is available). Both the male and female three-year average have fluctuated slightly between 2019 and 2020, with no major movement in either direction. for both men and women. After a rise in the male suicide rate from 2008 to

2012, the three-year moving average has decreased, and in 2015 the rate fell below the EU average for the first time since 2010. However, it should be noted that improvements in mortality rates and high levels of self-rated health can mask variations between regions, age groups and other population subgroups.

Rates of cigarette smoking have decreased since 2002, and alcohol consumption has also decreased over the same period, although not as dramatically.

Human health has the potential to be affected by exposure to toxic substances or pathogens in environmental media, such as air, water and soil. Human health impacts can also arise due to anthropogenic or naturally occurring accidents or disasters; such as landslides, flooding or structural failures. Nuisance and negative psychosocial impacts can also arise as a direct result of environmental factors; e.g. as a result of noise, dust, unsafe environments and / or crime; or indirectly, e.g. as a result of economic hardship. Occupational health and safety risks to construction site personnel are also inherent where demolition and construction works are proposed.

Health is an essential resource for everyday life, a public good, and an asset for health and human development. A healthy population is a major asset for society and improving the health and wellbeing of the nation is a priority for the Government. The Healthy Ireland Framework 2013-2025 is a collective response to the risks that threaten Ireland's future health and wellbeing.

Health Status of Bohernabreena	Very Good	Good	Fair	Bad	Very Bad	Not Stated
Total no. of People	3,261	1,531	447	87	13	333
Total % of People	57%	27%	8%	2%	0%	6%

Table 4.9 Health Status of Study Area i.e. of Bohernabreena DED 2022.

Table 4.9 above shows that most people (a combined 84%) in the Study Area have identified themselves as being in '*very good'* or *'good'* health.

The baseline environments in terms of air, surface water and groundwater / soil are detailed in Chapter 8 (Air Quality), Chapter 9 (Climate), Chapter 7 (Water) and Chapter 6 (Land, Soils & Geology), respectively.

The risks of accidents and disasters are addressed, where relevant, in the various specialist chapters herein. Flood risk, for instance, is addressed in Chapter 7 (Water); while geohazards are addressed in Chapter 6 (Land, Soils & Geology). As discussed in Chapter 3, 'Major Accidents & Disasters' has been scoped out of this EIAR. It should also be noted that the subject application is accompanied by separate stand alone assessments i.e. a Site Specific Flood Risk Assessment (SSFRA) prepared by Kilgallen & Partners Consulting Engineers and a Hydrological & Hydrogeological Qualitative Risk Assessment prepared by AWN Consulting.

In relation to the potential human health risks associated with the proposed works, an Outline Construction Management Plan (OCMP) is submitted under separate cover as part of this application. It outlines how the proposed works will be delivered safely and in a manner which minimises risk to human health, including that of Site personnel.

Healthcare within the study area is provided by a range of different organisations including public, voluntary and private agencies. The Health Services Executive is the primary agency responsible for delivering health and personal social services in Ireland. In recent years, primary care has been identified as the most

effective and cost-efficient way to treat patients. This offsets dependence on the hospital system allowing most patient care to take place at local, community locations which feature multi-disciplinary teams of healthcare professionals working together.

The proposed project is located within the SDCC administrative area which has access to national public hospitals, private hospitals, high-tech hospitals, accident and emergency services, psychiatric hospitals, rehabilitation centres, orthopaedic hospital and hospices. The submitted Social and Community Infrastructure Assessment provides details of health care services in the subject area (section 7.1).

4.5. Construction Impacts, Mitigation and Monitoring Measures

The duration of the construction phase is anticipated to be somewhere in the region of 84 months (or seven years). As such, associated impacts are expected to be short-term in duration. During this time, there will be no severance of land, loss of rights of way or amenities as a result of the proposed development.

In the absence of mitigation, potential impacts on population and human health as a result of the construction phase of the proposed development may be summarised as follows:

- Nuisance due to dust generating activities;
- Nuisance and disturbance due to noisy activities and vibration;
- Negative impacts on journey characteristics, parking availability and noise due to construction traffic;
- Negative visual impacts due to presence of construction site;
- Positive direct and indirect economic impacts due to construction employment and increased demand for local businesses, suppliers and other supporting services; and
- Negative impacts on site personnel and local community due to improper construction site waste management.

Overall, subject to adherence to best practice and implementation of appropriate mitigation measures detailed below and elsewhere in this EIAR, the overall temporary impacts associated with the construction phase (excluding employment, which will be positive) are considered to be negative and slight/moderate.

The main areas of impact are as follows:

Population and Demographic

There will be no impact on the demographic profile during the Construction Phase.

Residential Amenity

Construction of the proposed development will last for approximately seven years. During this time, the proposed development will cause a certain amount of loss of amenity, disruption and inconvenience to local residents, particularly the residents close to the boundaries of the site at Dodderbrook and the St. Anne's GAA lands to the north and along Bohernabreena Road to the west.

These impacts will be related to construction traffic (particularly HGVs) and travel disruption and also to the generation of noise and dust which is generally associated with the construction of such infrastructural projects. These issues are considered elsewhere in this EIAR and mitigation measures identified. In particular, the access constraints arising in respect of receptors are considered in Chapter 12 - Materials

Assets: Transportation and impacts arising from the generation of noise and dust are considered in Chapter 10 – Noise, Chapter 8 – Air and Chapter 9 Climate respectively. The visual impacts of the development are considered in Chapter 15 – The Landscape.

The overall impacts associated with the construction phase are temporary/short term and moderate.

Land Take, Use and Planning Policy

The construction works associated with the proposed development will generally be contained within the application site boundary and the lands under the control of the applicants. The proposed development also includes the opening up of new vehicular access points onto the Bohernabreena Road and the completion of a new eat-west main link street that will connect Oldcourt Road to Bohernabreena Road. The proposed development also proposes vehicular, pedestrian and cyclist connections from the subject site into adjoining areas to the north, east and west, i.e. Dodderbrook, St. Anne's GAA, Ballycullen Gate and Bohernabreena Road.

The development proposal is for a residential development on lands zoned to accommodate / permit for such use.

Employment

During the Construction Phase, the proposed development will have a short-term positive effect in terms generating economic activity. It is anticipated that up to c.250 no. construction personnel will be employed either directly or indirectly during the Construction Phase which is anticipated to extend over a period of approximately 7 years. Apart from the direct employment associated with the project, additional employment will be generated through the multiplier effect. In this case, the multiplier effect refers to the indirect impact that new spending has when it is circulated through the local economy. In the context of the overall economy of the area, the impact of the project in terms of employment (direct and indirect) will be slight and positive.

Travel and Commuting

During the Construction Phase there will be some traffic impacts on the receiving environment by virtue of the works related traffic. Measures to address these impacts are detailed in the R&WMP and they will be slight and short-term.

Health and Safety

The construction of any project of this nature has potential to give rise to an impact on health and safety of human beings if such activities are not managed properly. These concerns are addressed in the R&WMP and Outline CMP submitted as part of this planning application.

Human Health

The proposed development is likely to give rise to a short-term direct negative impact on the surrounding settlements during the Construction Phase, in particular the existing Dodderbrook and Ballycullen Gate residential developments located to the north and east respectively, as well as individual dwellings along Bohernabreena Road to the west. This will be a short-term significant effect on a localised scale and this is further discussed in Chapter 9 (Air Quality) Chapter 10 (Noise) and Chapter 15 (The Landscape) of this EIAR.

The Construction Phase will result in an element of noise, mobility of heavy vehicles, dust and the arrival

and departure of construction workers into the area. This impact will be negative, short-term, significant and localised.

Conclusion

In the absence of mitigation, predicted likely, significant, negative effects on population and human health as a result of the construction phase of the proposed development are as follows:

- A *negative, significant, short-term and reversible* impact within c.c50m of the site due to noise-generating activities, affecting residential receptors within c.40m of the subject site. Note that predicted noise levels are typical of developments of this scale and will be limited to site working hours (i.e. the day-time). The impacts will be limited to nuisance, irritation, minor disturbance while working, etc., and are highly subjective – lasting health impacts (e.g. hearing damage) are not expected to occur as a result of the proposed works.
- A *negative, moderate to significant and short-term* visual impact due to the presence of a substantial construction site.
- A *negative, localised, significant, short-term impact* due to the potential improper management of waste generated on the construction site.

Mitigation

Mitigation measures for the Construction Phase are outlined in each of the relevant chapters (No.s 4-15) and are also provided in Chapter 17 "*Summary of EIA Mitigation and Monitoring Measures*". During the Construction Phase a number of mitigating measures should be considered, including *inter alia:*

- Restrict working hours from 07.00 to 19.00 Mondays to Fridays inclusive, between 08.00 to 13.00 on Saturdays. No general works are envisaged to be carried out on Sundays. Should there be a need to work Sundays/Bank Holidays, a written request will be made to SDCC for permission to do so. Any conditions from SDCC relating to out of hours working will be followed including any required notifications to relevant parties;

- Maintain a Traffic Management Plan (TMP) in effect for duration of works;

- The CEMP will be agreed with the Planning Authority upon receipt of planning permission. The construction of the proposed development shall adhere to the relevant provisions of this Plan; and;

- As part of the CEMP, maintain a Dust and Noise abatement plan in operation.

Monitoring

Measures to monitor potential negative effects on people in respect of noise, air, traffic etc. are included in the following relevant Chapters of this EIAR.

In respect of the impacts assessed above, the contractor will monitor development during the construction phase to ensure compliance with the parameters of the Construction Management Plan. Remedial action will be taken, if required, to ensure construction activities conform to its requirements.

Reinstatement

It is not considered that reinstatement works are required during the Construction Phase.

4.6. Operational Impacts, Mitigation and Monitoring Measures

The duration of the operational phase of the proposed development is assumed to be long-term in duration, as per the definitions in the EPA 2022 EIAR guidelines.

The proposed development will comply with the statutory land use zoning policies and objectives of the South Dublin County Development Plan (2022 – 2028) and the Government's National Planning Framework (NPF). Development of the site will align with the NPF's high-level objective to achieve compact, sustainable growth and, in doing so, will realise the efficient use of currently agricultural lands with medium to high density housing.

In the absence of mitigation, potential impacts on population and human health as a result of the operation of the proposed development may be summarised as follows:

- Nuisance and disturbance of residents due to noisy building services plant and vehicular deliveries / collections within the site;
- Negative impacts on journey characteristics due to additional operational phase traffic generated by the proposed development;
- Positive impacts on pedestrians and cyclists due to enhanced permeability and provision of public realm which prioritises these users;
- Nuisance and disturbance due to increased traffic volumes arising from operation of proposed development;
- Visual impacts due to completion of proposed development, establishing significant new residential development;
- Direct and indirect positive socioeconomic impacts due to employment opportunities and increased demand for goods and services from local businesses;
- Positive impacts on existing and new residents due to provision of new facilities i.e. creche as well as direct links to local services, facilities and amenities;
- Positive socioeconomic impacts due to provision of significant additional housing; and
- Negative impacts on residents and local community due to improper waste management.

Population and Demographic

During the Operational Phase of the proposed development, the demographic profile will change with additional people moving into the locality. The changing demographic profile during the Operational Phase of the proposed development is likely to ensure a balanced age profile within the local area. Projected residential population from the proposed development will be approximately 1,553 persons. This is based on the average number of persons per household 2.97 persons, which is the average household size in the Study Area in 2022.

The impact on population is considered to be permanent but slight, and appropriate to the land-use zoning designation for the site, and the Core Strategy of the Development Plan.

Residential Amenity

All of existing local amenities will remain in place during the Operational Phase of the proposed development. Furthermore, the potential viability of these amenities going forward will be strengthened from the increased population of the area. The population increase will result in a greater demand for community and outdoor facilities in the study area. The CDP's zoning of the subject site has made provision for the development of new community facilities and requires for a detailed land use and function strategy, which sees the Applicant providing for a purpose built childcare facility on the subject lands, as well as a large Neighbourhood Park in the form of Oldcourt Park c.2.36Ha.

Therefore, the effects on community and amenities are deemed to be slightly positive or neutral in the long-term.

Land Take, Use & Planning Policy

The existing CDP set out the overall land use patterns for the lands on which this residential project is proposed. The nature of the development is permanent and will in time change the character of the area from a greenfield site to residential use. The proposed land use (i.e. residential, open space, amenity and employment) and will not impact on human health. Overall, the impact on land use and settlement is considered to be moderate, permanent and positive.

Employment

During the Operational Phase, the proposed development will have a slight, positive long-term impact. The proposed development will result in the creation of jobs associated with the proposed childcare facility, permanent apartment building management jobs. Other associated jobs such as gardening and window cleaning, with spin-off economic activity created for local retail and service providers.

Travel and Commuting

During the Operational Phase of the proposed development, there are likely to be some impacts on the receiving environment in relation to travel and commuting. The proposed development will provide additional people to sustain the public transport network. The impact due to the increase in number of persons potentially travelling and commuting will be significant and permanent, with a neutral long-term effect. Detailed information on the traffic impacts of the proposed development are set out in Chapter 12 Material Assets: Transportation.

Health and Safety

The operational phase of the development is unlikely to give rise to any additional risks of health and safety on human beings. Maintenance and building management plans will form part of the programme of development upon receipt of a grant of permission.

Human Health

The changes in the area will have a positive impact in terms of changing the age profile and increasing the longevity of local schools and facilities. The proposed development will create a modern living environment adjacent to a wide range of amenities, within easy commuting distance of Dublin city centre, providing locally positive health benefits to its residents.