PLAN NO: LRD6076/25 E8 09/07/25

LANDS AT THE FORMER HOLY CROSS COLLEGE, CLONLIFFE ROAD, DUBLIN 3 AND DRUMCONDRA ROAD LOWER, DRUMCONDRA, DUBLIN 9

ENVIRONMENTAL IMPACT ASSESSMENT
REPORT (EIAR) VOLUME 1: NON-TECHNICAL
SUMMARY (NTS)

Environmental Assessment

Built Environment Brady Shipman Martin

Built. Environment.

Client:

Date:

CWTC Multi Family ICAV acting solely in respect of its sub fund the DBTR DR1 Fund 04 July 2025

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Project No. 7088

Client: CWTC Multi Family ICAV acting solely in respect of its sub fund the DBTR DR1 Fund

Project Name: LANDS AT THE FORMER HOLY CROSS COLLEGE, CLONLIFFE ROAD, DUBLIN 3 AND DRUMCONDRA

ROAD LOWER, DRUMCONDRA, DUBLIN 9

Report Name: Environmental Impact Assessment Report (EIAR) Volume 1: Non-technical Summary (NTS)

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Environmental Impact Assessment Report (EIAR) Volume 1: Non-technical Summary (NTS)

### 1 Introduction

An Environmental Impact Assessment Report (EIAR) provides a statement of the effects that the proposed Large-scale Residential Development (LRD) at the former Holy Cross College, Clonliffe Road, Dublin 3 and Drumcondra Road Lower, Drumcondra, Dublin 9 ('the proposed development'), if carried out, would have on the environment. The EIAR has been prepared in accordance with the provisions of the Planning and Development Act 2000, as amended ('PDA 2000'), the Planning and Development Regulations 2001, as amended ('PDR 2001') and the relevant guidance documents, as detailed herein.

This document is a non-technical summary (NTS) of the Environmental Impact Assessment Report (EIAR), prepared to facilitate the dissemination of the information presented in the Environmental Impact Assessment Report to the general public. It shall endeavour, insofar as possible, to present a condensed summary of the Environmental Impact Assessment Report, using non-technical terms, but without omitting or understating any environmental effects of note.

## 1.1 The Proposed Development

#### 1.1.1 Site of the Proposed Development

The site of the proposed development is located at Holy Cross College, Clonliffe Road, Dublin 3 and Drumcondra Road Lower, Drumcondra, Dublin 9 (refer to **Figures 1.1 & 1.2**). The overall area of the site is c. 8.71 ha, with a developable site area of c. 8.25 ha. The site is located c. 1.7 km north of Dublin City Centre. It is bound by Drumcondra Road Lower, Archbishop's House (a Protected Structure), Mater Dei College and Crosscare Family Hub to the west; Clonliffe Road to the south; Cornmill Apartments and Belvedere College Rugby Grounds to the east; and by the River Tolka and potential future GAA sports ground to the north.

The site is situated in the administrative area of Dublin City Council, in the townlands of Clonliffe East and Clonliffe West.

The proposed development sits as part of a site masterplan for a wider landbank which includes an under-construction hotel development off Clonliffe Road and potential future GAA facilities (which would be subject to future planning applications).

The site is located within the grounds of the former Holy Cross College seminary. These lands were acquired by the Archdiocese in 1859 and college facilities were developed. They housed a seminary for the Catholic Church in Ireland and administration offices for the Archdiocese and various diocesan activities. The seminary ceased operation in 2000. Thereafter, the site was predominantly used for offices and activities of the Archdiocese and charitable organisations, which occupied relatively little space in the large site, and they have now vacated the site. The land and buildings on the site are significantly underutilised at present.

The site comprises a number of green spaces and existing large institutional buildings (approx. 11,865 m²) associated with its current / former use (some of which are Protected Structures). The site has many large mature trees, giving it a unique character in the context of the surrounding residential areas and busy roads. The northern portion of the site extending to the River Tolka is set back from the busy

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Drumcondra Road, separated by large mature trees, while the southern part of the site fronts onto Clonliffe Road.

The site sits between the established residential communities of Drumcondra to the west and north and Clonliffe Road to the south. Both are established, mature suburbs of Dublin City with the surrounding area predominately developed. Apart from residential uses, the surrounding area also features other mix of uses, including scattered commercial / retail enterprise, light industrial and warehousing to the north, and sports facilities to the south-east (Croke Park), north-east (Belvedere Rugby ground, Dublin Port Stadium Stella Maris Football Club) and north (Shelbourne Football Club). The immediate area gives access to a range of public facilities including community centres, healthcare, libraries, shops and sports / recreation facilities.

The site is approximately 400m from the Drumcondra Rail Station to the south-west, and adjacent to Drumcondra Road, which is served by several public bus routes. As part of the *Greater Dublin Area* (GDA) *Transport Strategy 2022-2042*, there are planned improvements to both the road, public transport, walking and cycling networks within the vicinity of the proposed development site, which will directly benefit residents and visitors, further enhancing sustainable travel options. As described in the GDA Transport Strategy 2022-2042, the delivery of these projects shall be undertaken in phases short-term projects (2022-2030), medium term (2031-2036) and longer term (2037-2042). These include Bus Connects Core Bus Corridor Dublin Swords to City centre Scheme (short-term), GDA's cycle network expansion (short-term), Dart+ West/South-west expansion (short-term) and new Metrolink (medium-term) that will run between Swords Estuary and Charlemont Station via Dublin Airport and the City Centre.

#### 1.1.2 Overview of the Proposed Development

The development will consist of the construction of a residential development set out in blocks ranging in height up to 13 storeys, to accommodate 1131 no. apartments including retail and crèche units, residential tenant amenity spaces, community/cultural spaces, mobility hubs and public open space.

The proposed development sits as part of a Site Masterplan for a wider landbank which includes an under-construction hotel development and potential future GAA facilities. To facilitate the proposed development the scheme will involve the demolition of a number of existing structures on the site.

The application site contains a number of Protected Structures including The Seminary Building, Holy Cross Chapel, South Link Building, The Assembly Hall and The Ambulatory while the wider lands also include The Red House and the Archbishop's House (both Protected Structures). The application proposes the renovation and reuse of the Seminary Building and the South Link Building to accommodate residential units and the use of the existing Holy Cross Chapel, Assembly Hall and Cloister Garden for use as community/cultural uses.

The residential buildings are arranged around a number of proposed public open spaces and routes throughout the site with extensive landscaping and tree planting proposed. Communal amenity spaces will be located adjacent to residential buildings and at roof level throughout the scheme. To facilitate the proposed development the scheme will involve the removal of some existing trees on the site.

The site is proposed to be accessed by vehicles, cyclists and pedestrians from a widened entrance on Clonliffe Road, at the junction with Jones's Road and through the opening up of an unused access point

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Environmental Impact Assessment Report (EIAR) Volume 1: Non-technical Summary (NTS)

on Drumcondra Road Lower at the junction with Hollybank Road. An additional cyclist and pedestrian access is proposed through an existing access point on Holy Cross Avenue. The development will include both basement and podium parking under a number of blocks to accommodate car parking spaces, bicycle parking, storage, services and plant areas.

The proposed development includes all site landscaping works, green roofs, boundary treatments, lighting, servicing and utilities, signage, and associated and ancillary works, including site development works above and below ground.

Refer to the statutory notices for detailed description.

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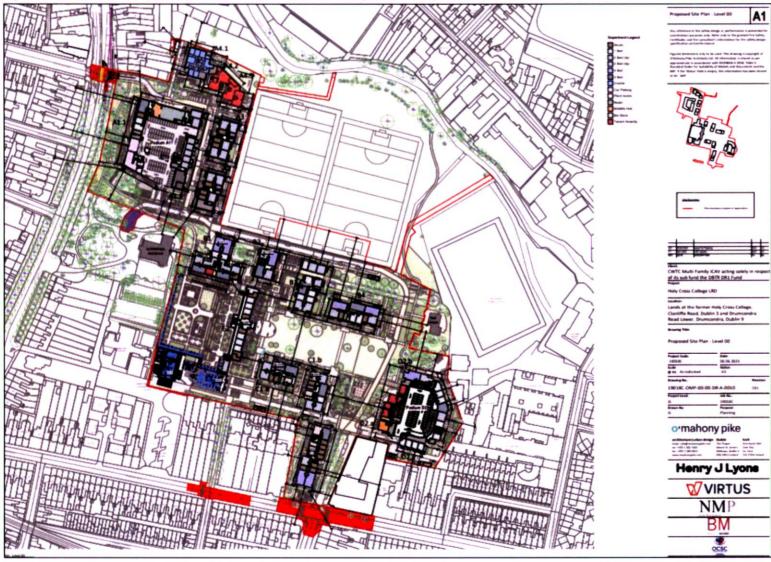
Figure 1.1 Site location of the proposed development



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Figure 1.2 Proposed site plan for the development (O'Mahony Pike, 2025)



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## 1.2 Format & Structure of the Environmental Impact Assessment Report

The EIAR has been completed in accordance with the requirements as set out in the EIA Directive, (2011/92/EU), as amended by Directive 2014/52/EU and relevant guidelines and documentation. The composition of this EIAR is in accordance with EPA Guidelines (2022) which requires that information contained within an EIAR should be in accordance with Article 3(1), Article 5(1) and any additional information specified under Annex IV under the Directive 2014/52/EU. Refer to **Table 1.1** below for the structure of this EIAR.

Table 1.1 Structure of the EIAR

Section	Description
Volume 1:	Non-technical Summary (NTS)
A summary of	the EIAR in non-technical language
Volume 2:	Main Report
Chapter 1	Introduction
Chapter 2	The EIA Process
Chapter 3	Planning & Development Context
Chapter 4	Consideration of Alternatives
Chapter 5	Description of the Proposed Development
Chapter 6	Consultation
Chapter 7	Population & Human Health
Chapter 8	Biodiversity
Chapter 9	Land, Soils, Geology & Hydrogeology
Chapter 10	Hydrology
Chapter 11	Air Quality
Chapter 12	Climate
Chapter 13	Noise & Vibration
Chapter 14	Landscape & Visual
Chapter 15	Cultural Heritage - Architectural Heritage
Chapter 16	Cultural Heritage - Archaeology
Chapter 17	Microclimate – Daylight & Sunlight
Chapter 18	Microclimate – Wind
Chapter 19	Traffic & Transportation
Chapter 20	Material Assets – Waste
Chapter 21	Material Assets – Services
Chapter 22	Interactions
Chapter 23	Cumulative Impacts
Chapter 24	Mitigation Measures & Monitoring
Volume 3:	Appendices
Technical refe	rence material supporting the EIAR chapters

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Environmental Impact Assessment Report (EIAR) Volume 1: Non-technical Summary (NTS)

#### 1.2.1 The Environmental Impact Assessment Team

The EIAR was coordinated by Brady Shipman Martin (BSM). Various environmental specialists were commissioned to complete the specialist chapters of the EIAR, as required by Directive 2014/52/EU on the assessment of the effects of certain public and private projects on the environment. A description of experts who have contributed to this EIAR, their qualifications, experience and any other relevant credentials is provided in **Table 1.2**.

Table 1.2 EIAR Contributors

Name	Company	Role / input	Qualifications
Thomas Burns	BSM	EIAR Project Manager; Landscape & Visual	<ul> <li>B.Agr.Sc. (Land.) Dip. EIA Mgmt., Adv. Dip. Plan. &amp; Env. Law</li> <li>Environmental Planner and Landscape Architect</li> <li>Member of Irish Landscape Institute &amp; Irish Environmental Law Association</li> <li>Over 30 years of experience in EIA and LVIA</li> </ul>
Pauline Byrne	BSM	Project Manager	<ul> <li>BSc Mgmt., Adv. Dip. Marketing, MA Regional &amp; Urban Planning</li> <li>Head of Planning</li> <li>Member of Royal Town Planning Institute (MRTPI)</li> <li>Member of Irish Planning Institute (MIPI)</li> <li>Over 20 years of experience</li> </ul>
Sorcha Turnbull	BSM	Planner	<ul> <li>BSc (Spatial Planning), Dip. EIA Mgmt</li> <li>Associate &amp; Senior Planner</li> <li>Corporate Member of the Irish Planning Institute (IPI) &amp; Associate Member of the Royal Town Planning Institute (RTPI)</li> <li>Over 15 years of experience</li> </ul>
Namrata Kaile	BSM	EIAR Co-ordinator; Background chapters; Population & Human Health; Material Assets - Services	<ul> <li>BSc Life Sciences, MSc Env. Sciences</li> <li>Environmental Consultant &amp; Ecologist</li> <li>Full Member CIEEM (MCIEEM)</li> <li>Over 5 years of experience</li> </ul>
Matthew Hague	BSM	Biodiversity; Appropriate Assessment Screening	<ul> <li>BSc, MSc, Adv. Dip. Plan. &amp; Env. Law</li> <li>Associate &amp; Senior Ecologist</li> <li>Chartered Environmentalist – CEnv</li> <li>MCIEEM</li> <li>Member of Irish Environmental Law Association</li> <li>Over 20 years of experience</li> </ul>
Sadye Goldfarb	BSM	Biodiversity; Appropriate Assessment Screening	<ul> <li>Bachelor's degree in Environmental Science and a master's degree in Biodiversity and Conservation from Trinity College Dublin.</li> <li>Ecologist</li> </ul>

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Environmental Impact Assessment Report (EIAR) Volume 1: Non-technical Summary (NTS)

Name	Company	Role / input	Qualifications
			<ul> <li>Qualifying Member of the Chartered Institute of Ecology and Environmental Management</li> <li>Over 1 year of experience</li> </ul>
Luke Maguire	AWN Consulting	Land, Soils, Geology & Hydrogeology; Hydrology	<ul> <li>B.Sc. in Geoscience (Geology, Hydrology, Hydrogeology, Climate Studies, Oceanology, Geochemistry, Geophysics)</li> <li>Environmental Consultant</li> <li>Experience in Environmental Impact Assessment (EIA), Flood Risk Assessment (Stage 1 &amp; 2) and Hydrological and Hydrogeological Qualitative Risk Assessment (HRA), and WFD Assessment Reporting and Environmental Monitoring (Groundwater, Surface Water &amp; Ground Gas)</li> <li>4 years of experience in Environmental Consulting and water resources</li> </ul>
Teri Hayes	AWN Consulting	Land, Soils, Geology & Hydrogeology	<ul> <li>Degree in Geology and a Masters in Hydrogeology</li> <li>Former President of the Irish Group of the Association of Hydrogeologists (IAH)</li> <li>Her specialist area of expertise is water resource management eco-hydrogeology, hydrological assessment and environmental impact assessment.</li> <li>Over 25 years of experience</li> </ul>
Marcelo Allende	AWN Consulting	Hydrology	<ul> <li>Water Resource Civil Engineering (BEng, Hons),         Bachelor of Science in Engineering (BSc, Hons)</li> <li>Principal Environmental Consultant</li> <li>Experienced in environmental investigations, geoenvironmental impact assessments, surface and groundwater resource management, hydrological and hydrogeological conceptual and numerical modelling, strategic and site specific flood risk assessments (Stage 1,2 and 3), Due Diligence reporting, baseline studies, soils, surface water and groundwater monitoring and field sampling programmes</li> <li>Over 20 years of experience</li> </ul>
Ciara Nolan	AWN Consulting	Air Quality & Climate	<ul> <li>MSc (Applied Environmental Science), BSc Eng (Energy Systems Engineering)</li> <li>Principal Air Quality &amp; Climate Consultant</li> <li>Member Institute of Air Quality Management (MIAQM), Member Institution of Environmental Sciences (MIEnvSc)</li> <li>8 years</li> </ul>
Tanmay Gojamgunde	AWN Consulting	Air Quality & Climate	<ul> <li>MSc (Air Pollution Management and Control)</li> <li>BTECH (Environmental Engineering)</li> </ul>

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Environmental Impact Assessment Report (EIAR) Volume 1: Non-technical Summary (NTS)

Name	Company	Role / input	Qualifications
			<ul> <li>Air Quality &amp; Climate Consultant</li> <li>Member Institute of Environmental Sciences (IES)</li> <li>1 year</li> </ul>
Alistair Maclaurin	AWN Consulting	Noise & Vibration	<ul> <li>Alistair Maclaurin (Senior Acoustic Consultant)</li> <li>Holds a BSc in Creative Music and Sound Technology and a Diploma in Acoustics and Noise Control. He is a member of the Institute of Acoustics.</li> <li>Alistair has worked in the field of acoustics since 2012. He has been the lead noise consultant across various sites on major infrastructure projects such as Crossrail and Thames Tideway Tunnel, specialising in construction noise assessment and control.</li> <li>Additionally, he has undertaken various other environmental noise assessments for infrastructure developments and planning reports.</li> </ul>
Robert Holohan	AWN Consulting	Noise & Vibration	<ul> <li>Robert Holohan (Acoustic Consultant)</li> <li>BA(Hons) in Geography and Business Marketing from Maynooth University as well as an environmental science background from his MSc in Coastal and Marine Environments from the University of Galway.</li> <li>He has completed noise monitoring campaigns across numerous sites and has experience in modelling and building acoustics.</li> <li>Holds a certificate from the Institute of Acoustics in environmental noise monitoring and building acoustics testing.</li> </ul>
Alex Craven	BSM	Landscape & Visual	<ul> <li>BSc, MLA</li> <li>University of Sheffield</li> <li>LVIA specialist</li> <li>Member of Irish Landscape Institute (MILI)</li> <li>Over 12 years of experience</li> </ul>
James Slattery	David Slattery Conservation Architects	Cultural Heritage - Architectural Heritage	<ul> <li>BArch DiplABRCons</li> <li>Conservation Architect (Principal)</li> <li>Member of the Royal Institute of Architects in Ireland</li> <li>20 years of experience</li> </ul>
Faith Bailey	IAC Archaeology	Cultural Heritage - Archaeology	<ul> <li>MA Cultural Landscape Management, BA (Hons)         Archaeology</li> <li>Senior Archaeological and Cultural Heritage         Consultant</li> <li>Licence eligible archaeologist, MIAI, MCIfA</li> </ul>

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Environmental Impact Assessment Report (EIAR) Volume 1: Non-technical Summary (NTS)

Name	Company	Role / input	Qualifications
			Over 21 years experience in the compilation of EIARs and assessments regarding the archaeological and cultural heritage resource, for all types of development nation-wide.
James Duff	Arup	Microclimate – Daylight/Sunlight	<ul> <li>Daylight Lead</li> <li>PhD (Physics) from TU Dublin</li> <li>Member Society of Light and Lighting (MSLL)</li> <li>15+ years' experience in matters related to daylight for planning – acting on behalf of developers in completing designs, planning authorities and government bodies in drafting policy and reviewing assessments, and for various parties involved in the wider dispute resolution processes.</li> </ul>
Rubina Ramponi	Arup	Microclimate - Wind	<ul> <li>MSc degree in building engineering and architecture from the University of Pavia (Italy) and a dual PhD from Eindhoven University (Netherlands) and Politecnico di Milano (Italy) with a focus on the computational modelling of urban wind flow and natural ventilation potential of buildings</li> <li>Associate in Arup's Wind Team in Dublin.</li> <li>CEng, MCIBSE</li> <li>Over 15 years of experience in building engineering and wind consulting, involved in wind microclimate studies to support the environmental impact assessment of high-profile projects across Ireland, the UK and USA. Example projects in Dublin have included Carrickmines Q3, Montrose LRD, Bailey Gibson SHD, and Guinness Quarter.</li> </ul>
Glen Moon	Systra	Traffic & Transportation	<ul> <li>MA (Hons) Geography, University of Edinburgh 2000</li> <li>Principal Transport Consultant</li> <li>Chartered Transport Planning Professional (CTTP)</li> <li>18 years' experience as a transport planner.</li> </ul>
Chonaill Bradley	AWN Consulting	Material Assets - Waste	<ul> <li>Bsc ENV,PG Dip Circ Econ</li> <li>Principal Environmental Consultant</li> <li>AssocCIWM</li> <li>10+ Years</li> </ul>

## 1.3 Impact Assessment Methodology

The assessment of impacts is based on the source-pathway-receptor model, which dictates that, for an environmental impact to occur, there must be a source, a receptor which is sensitive to the effect in question, and a pathway by which the effect can reach the receptor. Unless otherwise stated, effects /

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Environmental Impact Assessment Report (EIAR) Volume 1: Non-technical Summary (NTS)

impacts will be described and characterised in accordance with the terminology and criteria set out in the Environmental Protection Agency (EPA)'s 2022 Guidance (as set out in **Table 1.3**).

Table 1.3 Description of effects (EPA, 2022)

Criteria	Definition			
Quality of Effects				
Positive	A change that improves the quality of the environment (for example, by increasing species diversity, improving reproductive capacity of an ecosystem, removing nuisances or improving amenities).			
Neutral	No effects or effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error.			
Negative / adverse	A change that reduces the quality of the environment (for example, lessening species diversity, diminishing the reproductive capacity of an ecosystem, damaging health property or causing nuisance).			
Significance of Effe				
Imperceptible Not significant	An effect capable of measurement but without significant consequences.  An effect that causes noticeable changes in the character of the environment but without significant consequences.			
Slight	An effect that 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 that, by its character, magnitude, duration or intensity alters a sensitive aspect of the environment.			
Very significant	An effect that, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment.			
Profound	An effect that obliterates sensitive characteristics.			
Extent and Contex	t of Effects			
Extent	The size of the area, number of sites, or proportion of a population affected by an effect.			
Context	Describes whether the extent, duration, or frequency will conform or contrast with established (baseline) conditions (i.e. is it the biggest, longest effect ever?)			
Probability of Effe	cts			
Likely	The effects that can reasonably be expected to occur because of a proposed development if all mitigation measures are properly implemented.			
Unlikely	The effects that can reasonably be expected not to occur because of a proposed development if all mitigation measures are properly implemented.			
Duration, Reversit	pility & Frequency			
Momentary	Effects lasting from seconds to minutes.			
Brief	Effects lasting less than a day.			
Temporary	Effects lasting less than a year.			
Short-term	Effects lasting one to seven years.			
Medium-term	Effects lasting seven to fifteen years.			
Long-term	Effects lasting fifteen to sixty years.			
Permanent	Effects lasting over sixty years.			
Reversible	Effects that can be undone (for example, through remediation or restoration).			
Frequency	How often the effect will occur (e.g. once, rarely, occasionally, frequently, constantly, hourly, daily, weekly, monthly, annually, etc.).			

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Criteria	Definition
Type of Effects	
Indirect /	Impacts that are not a direct result of a proposed development, often produced away from
secondary	the site or because of a complex pathway.
Cumulative	The addition of many minor or significant effects, including effects of other plans and / or
	projects, to create larger, more significant effects.
Do-nothing	The environment as it would be in the future should the proposed development not be
	carried out.
Worst-case	The effects arising from a proposed development in the case where mitigation measures
	substantially fail.
Indeterminable	When the full consequences of a change in the environment cannot be described.
Irreversible	When the character, distinctiveness, diversity or reproductive capacity of an environment
	is permanently lost.
Residual	The effect that will occur after the proposed mitigation measures have been implemented.
Synergistic	Where the resultant effect is of greater significance than the sum of its constituents (e.g.
	combination of SO <sub>x</sub> and NO <sub>x</sub> to produce smog).

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## 2 The Environmental Impact Assessment Process

### 2.1 Legislation

The EIA Directive is the cornerstone of EIA legislation. It aims to ensure a high level of protection for the environment and human health and provides for public participation in relation to development consent and environmental matters. It requires that an assessment of the 'likely significant effects' a proposed development will have on the environment is carried out, where relevant, before development consent is given.

The EIA Directive entered into force in 1985 (Directive 85/337/EEC). It was amended three times (in 1997, 2003 and 2009) and subsequently replaced and codified by Directive 2011/92/EU, which was itself amended in 2014 by Directive 2014/52/EU ('the amending Directive'). The EIA Directive is transposed into Irish legislation by the PDA 2000, the PDR 2001 and the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018.

#### 2.2 Guidelines

This EIAR has been prepared in accordance with the aforementioned legislative provisions and the following guidelines, among others, as specified in the various specialist EIAR chapters:

- EPA (2022). Guidelines on the information to be contained in Environmental Impact Assessment Reports;
- EC (2017). Environmental Impact Assessment of Projects. Guidance on the preparation of Environmental Impact Assessment Report;
- EC (2017). Environmental Impact Assessment of Projects. Guidance on Scoping;
- EC (2017). Environmental Impact Assessment of Projects. Guidance on Screening;
- Department of Housing, Planning and Local Government (DHPLG) (2019. Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment;
- DHPLG (2017). Circular letter PL 1/2017 Advice on Administrative Provisions in Advance of Transposition;
- European Commission (EC) (1999). Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions;
- EC (2013). Guidance on Integrating Climate Change and Biodiversity into Environmental Impact Assessment.

### 2.3 Requirement for Environmental Impact Assessment

Parts 1 and 2 of Schedule 5 of the PDR 2001 list the classes of development for which EIA is required by default. In Part 1, major project classes (including industrial, chemical, energy, waste, infrastructural and intensive agricultural projects) are identified for the purposes of mandatory EIA. In Part 2, specific thresholds are cited; EIA is a requirement for projects of a class listed here that also meet or exceed the corresponding threshold (e.g. wind farms "with more than 5 turbines or having a total output greater than 5 megawatts").

The proposed development is not of a class of development listed in Part 1 of Schedule 5 of the PDR 2001 and, therefore, EIA is not a statutory requirement under this provision. However, the proposed

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development does correspond with the classes of development listed in paragraphs 10(b)(i) and 10(b)(iv) of Part 2 of Schedule 5 of the PDR 2001. The proposed development exceeds the thresholds specified in relation to Class 10(b)(i) of development, as detailed in **Table 2.1**, below.

Table 2.1 Statutory requirement for EIA under Part 2 of Schedule 5 of the PDR 2001

Provision (Part 2 of Schedule 5 of PDR 2001)	Proposed Development
Paragraph 10(b)(i):	c. 1,131 units
"Construction of more than 500 dwelling units."	
Paragraph 10(b)(iv):	Total site area c. 8.71Ha
"Urban development which would involve an area greater than 2	
hectares in the case of a business district, 10 hectares in the case of	
other parts of a built-up area and 20 hectares elsewhere."1	

Therefore, under the provisions of the Section 176 PDA and Schedule 5 of PDR 2001, EIA is a statutory requirement for the proposed development, and the Applicant is required to prepare an Environmental Impact Assessment Report.

### 2.4 Appropriate Assessment

European Sites, also known as 'Natura 2000' sites, include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). These are a network of sites designated for nature conservation under Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') and Directive 2009/147/EC on the conservation of wild birds (the 'Birds Directive'). The requirements for Appropriate Assessment (AA) are set out under Article 6 of the Habitats Directive, transposed into Irish law by the European Union (Birds and Natural Habitats) Regulations 2011 (as amended) (the 'Birds and Natural Habitats Regulations') and the PDA 2000.

Article 6(3) of the Habitats Directive states that:

"Any plan or project not directly connected with or necessary to the management of the site but likely to have significant effect thereon, either individually or in combination with other plans or projects, shall be subject to Appropriate Assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."

The first test is to establish whether, in relation to a particular plan or project, AA is required. Sections 177U of the PDA 2000 requires that the AA screening test must be applied to a proposed development, as follows:

To assess, in view of best scientific knowledge, if the development, individually or in combination with another plan or project is likely to have a significant effect on a European site; and

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<sup>1</sup> Where 'business district' refers to a district within a city or town in which the predominant land use is retail or commercial use.

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AA is required if it cannot be excluded, on the basis of objective information, that the development, individually or in combination with other plans or projects, will have a significant effect on a European Site.

An Appropriate Assessment Screening Report has been prepared by BSM in respect of the proposed development, in accordance with the requirements of the Habitats Directive and the Birds Directive, and the PDA 2000. It has concluded:

"In view of best scientific knowledge this report concludes that the proposed development at the Holy Cross College site, individually or in combination with another plan or project, will not have a significant effect on any European sites. This conclusion was reached without considering or taking into account mitigation measures or measures intended to avoid or reduce any impact on European sites.

It is considered that this report provides sufficient relevant information to allow the Competent Authority (Dublin City Council) to carry out an AA Screening under Section 177(U) of the Planning Acts and reach a determination, under Article 6 of the Habitats Directive, that the proposed development will not have any likely significant effects on European sites in light of their conservation objectives."

Please refer to Appropriate Assessment Screening Report, submitted under separate cover as part of the planning application.

## 2.5 Hydrological and Hydrogeological Qualitative Risk Assessment

A Hydrological and Hydrogeological Qualitative Risk Assessment (HHQRA) has been prepared by AWN Consulting (2025) and separate as part of the planning submission. The HHQRA concludes that –

'A conceptual site model (CSM) has been prepared following a desk top review of the site and surrounding environs. Based on this CSM, plausible Source-Pathway-Receptor linkages have been assessed assuming an absence of any measures intended to avoid or reduce harmful effects of the proposed project (i.e., mitigation measures) in place at the proposed development site.

The proposed development (design / drainage strategy) site has no direct hydrological pathway or connection to any of the above listed areas of protection and conservation which are located downgradient of the proposed development site. The proposed development would have an indirect hydrological pathway / linkage to the Tolka Estuary and Dublin Bay and the corresponding associated natura 2000 conservation / protection areas via the proposed surface water (stormwater) drainage and the foul (wastewater) network which outfalls to the River Tolka / surface water network at Clonliffe Road (post treatment onsite), albeit the source pathway linkage is over a significant distance allowing for significant attenuation and large dilution factor within the river catchment and estuary.

There is no direct source pathway linkage between the Proposed Development site and any open waters or Natura 2000 sites (i.e., Tolka Estuary or Dublin Bay SAC/SPA/pNHA). There is an indirect source pathway linkage from the Proposed Development through the foul public sewer which will eventually discharge to the Ringsend WWTP and ultimately discharges to South Dublin Bay SAC/SPA/pNHA (4.4 km downgradient of the proposed site). The future development has a peak foul discharge that would equate to 0.166% of the licensed discharge at Ringsend

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WWTP (peak hydraulic capacity). It should be noted that the Ringsend WwTP has capacity for this proposed foul effluent (AER, 2023).

Even disregarding the operation of design measures including an attenuation system and petrol interceptors on site, it is concluded that there will be imperceptible impacts from the proposed development to the water bodies due to emissions from the site stormwater drainage infrastructure to the wider drainage network. It should be noted the proposal also includes an attenuation system and petrol / hydrocarbon interceptors as part of best practice project design, and these features will provide additional filtration from the site to the drainage network.

It is concluded that there are no pollutant linkages as a result of the construction or operation of the Proposed Development which could result in a water quality impact which could alter the habitat requirements of the Natura 2000 sites within Tolka Estuary and Dublin Bay.

Finally, and in line with good practice, appropriate and effective mitigation measures will be included in the construction design, management of construction programme and during the operational phase of the proposed development. With regards to the construction phase, adequate mitigation measures will be incorporated in the Construction Environmental Management Plan (CEMP). These specific measures will provide further protection to the receiving soil and water environments. However, the protection of downstream European sites is in no way reliant on these measures and they have not been taken into account in this assessment.'

## 2.6 Site Specific Flood Risk Assessment

A Site-Specific Flood Risk Assessment (SSFRA) has been prepared in respect of the proposed development by Barrett Mahony Civil & Structural Consulting Engineers (2025), in accordance with the OPW guidelines *The Planning System and Flood Risk Management – Guidelines for Planning Authorities* (2009). The key findings and conclusions of the SSFRA are summarised as follows:

'Based on available and recorded information, the main portion of site has not been subject to flooding in recent history. (Only buried drainage outfalls are located in the flood zones).

The risk of tidal flooding is considered very low as the subject site lies outside the 0.1% AEP.

The risk of fluvial flooding in the area is currently under review by the OPW. However, this risk is considered low due the site located outside the 0.1% AEP fluvial coupled with the 50% AEP tidal flood extent. In addition, the considerable level difference between the proposed finished levels and the riverbank levels in the vicinity.

The risk of flooding due to ground water ingress to the proposed development is considered low. Waterproofing construction methods and measures will be employed to prevent ingress of ground water into the basements, in the normal manner.

The risk of pluvial flooding is considered low, due to the site location and proposed measures for the development.

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Based on the flood risk identification in Stage 1, the proposed development falls in Flood Zone C. Hence, the proposed development is deemed 'Appropriate' in accordance with the guidelines of the OPW's publication.'

Please refer to the SSFRA (Barrett Mahony Civil & Structural Consulting Engineers, 2025) submitted under separate cover as part of the planning application. Refer also to Chapter 10 (Hydrology) of the EIAR Volume 2.

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## 3 Planning & Development Context

This Chapter of the Environmental Impact Assessment Report presents a review of the planning and development policy context at a national, regional and local level. The following policy documents of relevance have been discussed in relation to the proposed development in the main text of the Environmental Impact Assessment Report (Volume 2):

#### International

United Nations Sustainable Development Goals (2015)

#### European

- Environmental Impact Assessment Directive (consolidated 2011/92/EU and 2014/52/EU);
- Birds (2009/147/EC) and Habitats Directive (92/43/EEC);
- EU Water Framework Directive (2000/60/EC).

#### National

- Project Ireland 2040 National Planning Framework (NPF) and National Development Plan (2021-2030) including the First Revision to the NPF (April 2025);
- Rebuilding Ireland Action Plan for Housing and Homelessness (2016);
- Sustainable Urban Housing: Design Standards for New Apartments (July 2023);
- Urban Development and Building Heights Guidelines for Planning Authorities (2018);
- Design Manual for Urban Roads and Streets (2019);
- Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2010);
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024);
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009);
- Climate Action Plan (2025);
- Childcare Facilities Guidelines for Planning Authorities (2001);
- Housing for All A New Housing Plan for Ireland (2021);
- Cycle Design Manual (2023);
- National Sustainable Mobility Policy (2022);
- Architectural Heritage Protection; Guidelines for Planning Authorities (2011).

#### Regional

- Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019 2031;
- Dublin City Development Plan 2022 2028;
- Transport Strategy for the Greater Dublin Area 2022 2042.

The development of the proposed site is supported by both national and regional policy and guidance documents. Please refer to the accompanying EIAR and the Planning Report & Statement of Consistency for the proposed development, prepared by BSM and submitted under separate cover as part of the planning application, which details the consistency of the proposed development with the above listed planning and policy documents.

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#### 4 Consideration of Alternatives

Consideration of alternatives is an important step in the EIA process, which is necessary to evaluate the likely environmental consequences of a range of development strategies for the delivery of the proposed development. This chapter of the EIAR provides an overview of the alternatives that have been considered for the proposed development.

Article 5(1) of the amended Directive requires the consideration of reasonable alternatives that are relevant to the proposed development, taking into account the effects of the proposed development on the environment. Article 5(1)(d) states that the information contained in the EIAR shall include:

"... 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."

Further, Annex IV(2) states that the information for the EIAR shall 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."

Part 1(d) of Schedule 6 of the PDR 2001 transposes this requirement, stating that an EIAR shall include:

"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."

In accordance with the EIAR guidelines, different classes of alternatives may be considered at key stages during the process. As environmental issues emerge during the preparation of the EIAR, alternative designs may need to be considered early on in the process, or alternative mitigation options may need to be considered towards the end of the process. The EPA guidelines state that:

"The objective is for the developer to present a representative range of the practicable alternatives considered. The alternatives should be described with 'an indication of the main reasons for selecting the chosen option'. It is generally sufficient to provide a broad description of each main alternative and the key issues associated with each, showing how environmental considerations were taken into account in deciding on the selected option. A detailed assessment (or 'mini-EIA') of each alternative is not required." (p. 33)

The EPA Guidelines indicate that alternatives should be considered under the following headings:

- 1. 'Do-Nothing' Alternative;
- 2. Alternative Locations:
- Alternative Layouts;
- 4. Alternative Designs;
- 5. Alternative Processes; and
- 6. Alternative Mitigation Measures

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### 4.1 Do-Nothing Alternative

The 'Do-Nothing' alternative considers the likely scenario that would arise, assuming the proposed development was not progressed, i.e. if nothing were done. Note that this Chapter discusses the Do-Nothing scenario in terms of development (or lack thereof) in the absence of the proposed development. The likely impacts of a Do-Nothing scenario in relation to the various environmental topics (e.g. architectural heritage, biodiversity, traffic and so on) is discussed in the respective chapters of this EIAR.

The most likely Do-Nothing scenarios in this case are:

- A continuation of the existing status and use of the lands and buildings (i.e. very limited use by the Catholic Archdiocese); or
- Development (likely residential) under the scope of a separate application / proposal, at some point in the future.

The current site is not in use other than the temporary use of the Assembly Hall by the Catholic Archdiocese, which in its current form has limited engagement with the public. The wider grounds are inaccessible to the public and the buildings remain vacant. The site would remain overgrown, underutilised and restricting permeability in the area.

In the context of the ongoing housing crisis in Dublin City, the former scenario (a) is considered to represent an inefficient, uneconomical and socially suboptimal use of the Holy Cross College lands. The opportunity cost, in this scenario, would include the 1131 proposed residential units, and the accommodation that these would otherwise provide.

The latter scenario (b) is considered somewhat more likely, taking into consideration the following contextual factors and trends:

- The Holy Cross College lands are zoned as Z12, 'Institutional Land (Future Development Potential)' under the Dublin City Development Plan (2022 2028), which states 'Where lands zoned Z12 are to be developed, a minimum of 25% of the site will be required to be retained as accessible public open space to safeguard the essential open character and landscape features of the site. Where such lands are redeveloped, the predominant land-use will be residential'.
- The lands are strategically located in terms of public transport / mobility, proximity to employment and community amenities;
- The lands and buildings (including Protected Structures) are increasingly underutilised and vacant and this trend is not likely to change in the absence of re-development for new purposes;
- Significant demand for housing in Dublin City; and
- The policy context at national and regional levels for 'compact urban development', whereby additional units are preferentially delivered within the existing built-up footprint of urban areas.

Given these contextual factors and the extent of the project need, it is very likely that an alternative residential development proposal would be submitted in a do-nothing scenario for this project. Like this project, such other proposal would be assessed on its merits.

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#### 4.2 Alternative Locations

The proposed development site is zoned predominately as Z12 — 'Institutional Land (Future Development Potential)' which has the objective - "to ensure existing environmental amenities are protected in the predominantly residential future use of these lands". A small portion of the lands to the north adjacent the River Tolka is zoned Z9- Amenity/Open Space Lands/ Green Network and a small area of lands to the northwest are zoned Z1 Sustainable Residential Neighbourhoods.

Based on the zoning of the Holy Cross College lands, as described above, it is considered that the site is entirely suitable for the proposed nature of this LRD application. It is not considered that the consideration of alternative locations is relevant in this case. As stated in the EPA guidelines that:

"Some locations have more inherent environmental sensitivities than others. Depending on the type of project and the range of alternatives which the developer can realistically consider, it may be possible to avoid such sites in favour of sites which have fewer constraints and more capacity to sustainably assimilate the project. It can be useful to ensure that a range of options, that may reasonably be available, are included in the evaluation." (p. 35)

[...]

"Clearly in some instances some of the alternatives described below will not be applicable - e.g. there may be no relevant 'alternative location'..." (p. 33)

At this location, the proposed development will deliver additional dwellings along with associated infrastructure and links to existing community facilities. The subject lands will gain benefit from existing transport, social and community infrastructure. It is considered that the site is entirely suitable for the nature of the proposed development, and it is not necessary to consider alternative locations or sites. Given the extent and urgency of the project need, it is considered that alternative suitable sites will be required to be developed in addition to this site rather than in the alternative.

## 4.3 Alternative Layouts & Design

A series of design iterations of the proposed development have been considered, as detailed in the main text of the Environmental Impact Assessment Report (Volume 2):

- Design Alternative 1;
- Design Alternative 2;
- Design Alternative 3;
- Design Alternative 4 Final Layout.

The evolution of the design and layout for the proposed development has been an iterative process which involved the entire design team and thorough pre-planning engagement with Dublin City Council. The design has undergone rigorous appraisal, which has led to a final layout that responds appropriately to the site characteristics, opportunities and constraints. The final layout is presented in the Architectural Drawings and the Architectural Design Statement (O'Mahony Pike, 2025 and Henry J Lyons, 2025), which have been submitted under separate cover and should be read in conjunction with this chapter.

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The EIAR demonstrates that the site and the surrounding area have the environmental capacity to accommodate the proposed development without significant risk of impact upon environmental sensitivities due to the location or nature of the proposed development.

The proposed layout is designed to function, in combination with the already permitted developments on the wider Masterplan site, as a mixed-use (predominantly residential) development on a significantly underutilised and strategically located site. A detailed discussion of the architectural design rationale and strategy for the proposed development and wider Masterplan site is presented in the Site Masterplan Document and Architectural Design Statement, all of which have been prepared by OMP & HJL Architects and submitted under separate covers as part of this application.

This section of the EIAR sets out the intermediate design progressions of the proposed development, includes figures showing the proposed layout at each stage of this process, and summarises the main considerations that have influenced the progression of the design.

Given the sites location, proximate to Dublin City and significant employment centres, the site is suitable to an increased density and height of development in order to optimise residential development on strategic sites. This coupled with the constraints of the site in terms of its existing historic buildings and trees meant that an apartment scheme is appropriate where trying to provide housing typologies would represent an underutilisation of land. The scheme, within apartment only typologies, provides for a range of sized units from studios to 4-person units offering diversity of units for different demographics and typologies more typically found in the immediate area.

In terms of access to the site, again considering the constraints of existing features such as historic walls, existing trees and the nature of the adjacent roads, additional vehicular access points were not considered appropriate and existing (Clonliffe Road) and former (Drumcondra Rd) locations upgraded. This approach also is in keeping with the scheme focus of protecting the existing woodland and historic context by minimising roads and vehicular movements while prioritising pedestrian and sustainable modes of transport to and from the site.

The current design was arrived at in order to have less impact on mature trees, increase performance of daylighting to the units and sunlight to the public and communal open space, increase the separation distances between the proposed blocks and the distances and proximity to adjoining residences, enhance the setting of the protected structures, and also to further improve accessibility to the public realm, and enhance communal areas.

### 4.4 Alternative Processes

Having regard to the nature of the proposed development, this is not considered a relevant class of alternatives in this case.

However, the residential units will be detailed designed to comply with building regulations framework and the requirement to achieve Nearly Zero Energy Building (NZEB) standard for new developments.

### 4.5 Alternative Mitigation Measures

Where appropriate, alternative mitigation measures will be considered by the relevant specialist contributors to the EIAR.

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### 4.6 Reasons for Selecting the Preferred Alternative

The design of potential alternatives for the proposed development evolved through and iterative process and a number of key structuring principles. In following this process the preferred development alternative best allowed for:

- Preservation of the institutional and wooded character of the lands.
- Retaining existing trees and general site topograpghy
- Ability to enhance and protect the built heritage, historic setting, and strong landscape character of the lands, and responding to the scale of the existing buildings.
- Minimising impact on adjacent residential and other areas
- Positive delivery of public open space (in accordance with Z12 zoning), while retaining existing good quality trees and providing generous spacing between proposed buildings.
- Provision of pedestrian connectivity and permeability
- Minimising adverse environmental impacts and maximising positive effects.

The site has two key features, being existing and adjacent Protected Structures and existing trees. The proposed development has been designed to sit comfortably within its surrounds, minimising impact on adjacent developments and the Protected Structures. The trees for the most part exist in clusters as avenues or wooded areas with some specimens planted throughout. These are of ecological, environmental, historical and aesthetic value and are noted as one of the sites key assets and features. The significance of the existing trees is such that they have effectively shaped the proposed masterplan layout, ensuring that levels, services, access, foundations and construction of building footprints can take place and serve future residents whilst protecting root structures, overhanging limbs and the general health and longevity of trees.

The Architects Design Statement, jointly prepared by OMP & Henry J Lyons sets out the overall approach to the site and how it meets the objectives of the Masterplan as well as the specifics of the proposed development and how it complies with appropriate development standards.

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## 5 Description of the Proposed Development

This Chapter of the Environmental Impact Assessment Report provides a general description of the site and its surrounds, sets out the need for the proposed development, and describes the proposed development – its design, construction methodology and envisaged operation. In accordance with Article 5(1)(a) of the 2011 EIA Directive, as amended by Directive 2014/52/EU, the description of a proposed development should comprise "…information on the site, design, size and other relevant features".

### 5.1 Overview of the Proposed Development

The development will consist of the construction of a residential development set out in blocks ranging in height up to 13 storeys, to accommodate 1131 no. apartments including retail and crèche units, residential tenant amenity spaces, community/cultural spaces, mobility hubs and public open space.

The proposed development sits as part of a Site Masterplan for a wider landbank which includes an under-construction hotel development and potential future GAA facilities. To facilitate the proposed development the scheme will involve the demolition of a number of existing structures on the site.

The application site contains a number of Protected Structures including The Seminary Building, Holy Cross Chapel, South Link Building, The Assembly Hall and The Ambulatory while the wider lands also include The Red House and the Archbishop's House (both Protected Structures). The application proposes the renovation and reuse of the Seminary Building and the South Link Building to accommodate residential units and the use of the existing Holy Cross Chapel, Assembly Hall and Cloister Garden for use as community/cultural uses.

The residential buildings are arranged around a number of proposed public open spaces and routes throughout the site with extensive landscaping and tree planting proposed. Communal amenity spaces will be located adjacent to residential buildings and at roof level throughout the scheme. To facilitate the proposed development the scheme will involve the removal of some existing trees on the site.

The site is proposed to be accessed by vehicles, cyclists and pedestrians from a widened entrance on Clonliffe Road, at the junction with Jones's Road and through the opening up of an unused access point on Drumcondra Road Lower at the junction with Hollybank Road. An additional cyclist and pedestrian access is proposed through an existing access point on Holy Cross Avenue. The development will include both basement and podium parking under a number of blocks to accommodate car parking spaces, bicycle parking, storage, services and plant areas.

The proposed development includes all site landscaping works, green roofs, boundary treatments, lighting, servicing and utilities, signage, and associated and ancillary works, including site development works above and below ground.

For a full development description please refer to the Planning Report & Statement of Consistency prepared by Brady Shipman Martin.

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#### 5.1.1 Site History

The Holy Cross College Lands were acquired by the Roman Catholic Archdiocese of Dublin in 1859. College facilities were developed, including a seminary for the Catholic Church in Ireland, and administration offices for the Archdiocese and various diocesan activities. The seminary ceased operation in 2000. Thereafter, the site was predominantly used for offices and activities of the Archdiocese and charitable organisations, which occupied relatively little space in the large site, and they have now vacated the site. The land and buildings on the site are significantly underutilised at present.

The Archdiocese has since entered into an agreement with the Gaelic Athletic Association (GAA) to acquire these lands. The GAA have subsequently entered into an agreement to onward sell these to the applicant (CWTC Multi Family ICAV acting solely in respect of its sub fund the DBTR DR1 Fund). The Archdiocese will retain the Archbishop's House and surrounding lands in the south-west corner of the Holy Cross College property, which includes the Mater Dei building and a large surface car park, currently permitted as a Crosscare Family Hub. The GAA are retaining a under construction hotel site, onto Clonliffe Road and lands adjacent the River Tolka for future proposed GAA facilities which are subject to a future planning application.

The site is part of the wider Holy Cross College lands, for which a Masterplan has been prepared on behalf of Hines and the GAA, in accordance with the requirements of the 'Z12' zoning of the lands under the scope of the Dublin City Development Plan 2022 – 2028. The Holy Cross College lands comprise a total masterplan area of c. 14.5 ha. For further information, refer to the Masterplan by OMP Architects, submitted under separate cover as part of this application.

#### 5.1.2 Masterplan for the wider Holy Cross Lands

A Site Masterplan (O'Mahony Pike, 2025) has been prepared relating to all of the Clonliffe Lands that are subject to the Z12 zoning. The Masterplan describes the future strategic vision and structure for the redevelopment of lands to deliver a coordinated development in accordance with the Z12 zoning. It takes cognisance of key stakeholders such as the Archdiocese of Dublin, Belvedere College, Mater Dei Institute of Education, the local communities, the GAA and the applicant.

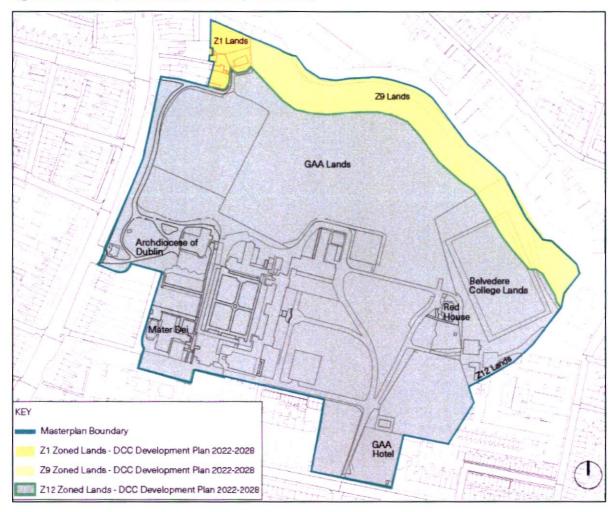
The lands that are the subject of this Master Plan, are predominately zoned Z12 – 'Institutional Land (Future Development Potential)' which has the objectives – 'to ensure existing environmental amenities are protected in the predominantly residential future use of these lands'. A small portion of the lands to the north adjacent the River Tolka is zoned Z9- Amenity/Open Space Lands/ Green Network and a small area of lands to the northwest are zoned Z1 Sustainable Residential Neighbourhoods. These lands are included in the Masterplan for completeness Refer to Figure 5.1 for the Masterplan Lands.

The masterplan sets out the framework for development across the lands through the hierarchy of public, shared and private open space, amenity spaces, potential for residential development, heights, massing and placemaking and further intends to describe how the proposed development will connect with and enhance the surrounding communities. Refer to the standalone plan submitted as part of the planning application for further details.

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Figure 5.1 Masterplan Lands (O'Mahony Pike, 2025)



### 5.2 Construction Phase

A Construction & Environmental Management Plan (CEMP) and Construction Management Plan (CMP) has been prepared in respect of the proposed development by DCON Safety Consultants (refer to standalone document submitted under separate cover). They contain best practice measures and protocols to be implemented during the construction phase of the proposed development to avoid / minimise environmental impacts.

The appointed contractor will be responsible for the implementation of the CEMP & CMP. To ensure these documents remain fit for purpose, they will be maintained as live documents. The appointed contractor will be responsible for updating the CEMP & CMP, as required; e.g. to reflect the publication of relevant new or revised guidelines and / or new statutory requirements. The full schedule of environmental commitments (i.e. all mitigation measures set out in the CEMP and Environmental Impact Assessment Report as part of the planning application, as well as any applicable conditions of development consent) will be included in the CEMP & CMP by the appointed contractor.

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### 5.2.1 Indicative Construction Methodology

The following indicative construction methodology has been adapted from the Development Construction Management Plan, drafted by DCON Safety Consultants (2025) on the basis of initial scheme design inputs. Specific methodologies of work will be defined in advance of commencement of works by each contractor.

Temporary construction surface drainage and sediment control measures, including the use of SUDS, will be provided before earthworks commence. The drainage design follows the natural topography of the site and utilises the existing storm water infrastructure within the surrounding infrastructure where possible including the River Tolka.

### 5.2.1.1 Preparatory and Site Set-up Works (all Blocks)

These enabling works are expected to include the following elements:

- Site cabin delivery and placement;
- Completion of all outstanding required surveys;
- Contractor temporary service installations;
- Construction of appropriate hoarding to neighbouring properties;
- Establishment of tree protection measures;
- Installation of CCTV coverage or other agreed security measures;
- Set-up of noise / dust / vibration monitoring stations in predetermined areas closest to sensitive receptors, as required by conditions of planning permission;
- Review of pest control needs by specialist contractor;
- New builders' supply main board to be installed in appropriate determined location, agreed between the mechanical and electrical (M&E) designer, contractor and temporary works electrician.

The site preparation works will also include setting up of access control to the various block site areas, secure compounds for the storage of all on-site machinery and materials, tree protection means, permanent and temporary hoarding/fencing and erection of signage.

#### Invasive Species Management Plan

Japanese knotweed (*Reynoutria japonica*) has been detected on the perimeters of the north-west and south-west boundaries of the site. The Management of Japanese knotweed on site shall be overseen by a competent specialist. A specific Invasive Species Management Plan has been prepared by Invas Biosecurity (2025) (and included in Appendix 8.3) and kept for site owners.

#### 5.2.1.2 Substructure Construction

Substructure works will include groundworks, formwork, basement creation (up to ground flood podium), rising concrete elements, attenuation and drainage. Where possible, an overlap of substructure works between blocks will be sought to maximise supply chain efficiencies for the works contractor. Refer to the Basement Impact Assessment (BMCE, 2025) that details the construction methodology for the works proposed for basements.

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#### 5.2.1.3 Residential Block Construction

Residential block construction is expected to proceed as follows:

- Cores will be installed initially. These are central to each block footprint. For the upper-level slabs to be completed, the core must be cast to that level. To minimise program impact, zones will be created to each basement or podium slab level to allow it to be cast without the core being complete to that level. For example, a proprietary vertical wall formwork system that is self-climbing may be used to cast the core. The core system will be supported by a tower crane for lifting of materials, an Alimak or alterative means, to get construction personnel and tools to the system, and its own satellite concrete placing boom to place concrete.
- Lobby slabs, header beams and stairs will follow the core walls and will be cast as soon as practical to maintain structural stability of the core walls and provide access to cast the core slabs. When the last vertical wall elements are cast, the jump form will be removed in a strategic sequence, for safety reasons, and to allow the lift motor rooms to be cast as early as possible to get builders' lifts operating.
- Structure trades and works will be supported by tower cranes for lifting of materials, formwork hoists for the lifting of recycled formwork, Alimaks or alterative means for the transportation of operatives and materials to decks, satellite placing booms for the placement of concrete, and proprietary perimeter edge screens for provision of fall protection to operatives.
- The façade will be erected as soon as practical to commence waterproofing floors, so that finishes and fit-out can commence. The roof embellishments will commence when the structure is complete. These works will not be completed until all plant has been lifted into the plant rooms and the façade has been installed to the corresponding level to complete the water tightness of the fabric.
- When slabs are cast and the formwork is stripped, service installation will commence. These works will not be completed until the façade to the corresponding level is completed, for reasons of personnel safety and weatherproofing.
- Once façades and services are installed, internal finishes will be completed. Plant, equipment and materials will be lifted to the floors via several means (tower cranes, Alimaks or builders' lifts), depending on what stage the building is at.
- When the fabric of the tower is complete, and the tower cranes have been removed, the gantries will also be removed, allowing external works to be completed. As some of the external works will be to footpaths and roads to mesh them in with the new building, some footpath and lane closures will be required. These will be coordinated with DCC.

#### 5.2.1.4 Demolition Works

The proposed development will include demolition of a number of former office/college buildings on site, including the New Wing (c. 2476.4 m²), Library Wing Buildings (c. 3601.6m²), later additions to the seminary building (c. 249m²), resulting in a total demolition area of c. 6,327m². There will be c. 7508.3 m³ of demolition material generated as a result of the proposed development. These are set out below in **Figure 5.2**, below. The site contains a number of Protected Structures including The Seminary Building, Holy Cross Chapel, South Link Building, The Assembly Hall and The Ambulatory. The application proposes the renovation of the Seminary Building and South Link Building to accommodate residential

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units and the renovation of the existing Holy Cross Chapel and Assembly Hall buildings for use as community/cultural uses.

Demolition works will be carried out, comprising of four principal stages:

- 1. Preparatory works;
- 2. Asbestos removal;
- 3. Soft strip; and
- 4. Hard demolition.

Preparatory works will include completion of structural assessment and services surveys, review of completed asbestos survey, installation of contractor's temporary services, construction of appropriate hoarding to site areas, establishment of noise/dust/vibration monitoring stations (in line with Best Practice as set out in Chapter 24 Mitigation Measures & Monitoring of the EIAR (Volume 2) and the CEMP prepared by DCON Safety Consultants 2025 and also as required by conditions of planning permission) and isolation of all services (including but not limited to heating, sprinklers, local electrical distribution boards, water, drainage, soil pipes, lighting, control panels, fire alarms circuits, fire boards, gas mains, etc.).

An Asbestos Survey Report was prepared by Phoenix Environmental Safety Limited in May 2020 (Refer to **Appendix 5.1**, Volume 3). During the asbestos survey, asbestos containing materials (ACMs) were detected in several locations within some of the buildings, including in floor tiling, insulating boards, downpipes, bitumen and stair nosings. Asbestos removal works will be carried out to structures prior to demolition, as set out in the Construction Management Plan prepare by DCON and submitted under separate cover. This will involve removal of asbestos and asbestos containing materials (ACMs) under licence, and reoccupation certification for all areas prior to soft strip.

Soft strip works will be carried out to structures following asbestos removal (where required) and prior to demolition, subject to safe isolation of energy services. This will include the removal of all non-load-bearing internal structures, finishes, fixtures, furniture and equipment.

Following soft strip works, hard demolition of all non-protected structures to be removed will be carried out, including removal of all building structural members, external façades and roof finishes. Disposal or re-use of demolition materials will be carried out in accordance with the Resource & Waste Management Plan prepared by AWN (2025) and submitted under separate cover at **Appendix 20.1**, Volume 3.

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Figure 5.2 Building footprint for demolition denoted in orange (Source: O'Mahony Pike, 2025)



### 5.2.1.5 Refurbishment Works (Seminary, Library and Church)

In advance of the commencement of refurbishment works, isolation of services (including but not limited to heating, sprinklers, local electrical distribution boards, substation, water, drainage, soil pipes, lighting, control panels, fire alarms circuits, fire boards, gas mains, etc.), asbestos removal and soft strip works will be carried out to the structures in question. Refurbishment works are generally expected to proceed as follows:

- An external independent scaffold will be erected, designed for alterations to facilitate other trades cleaning or repointing the external façade;
- Appropriate temporary works will be carried out, as required, to stabilise external walls prior to any internal remodelling taking place;
- Construction materials will be loaded out by crane;

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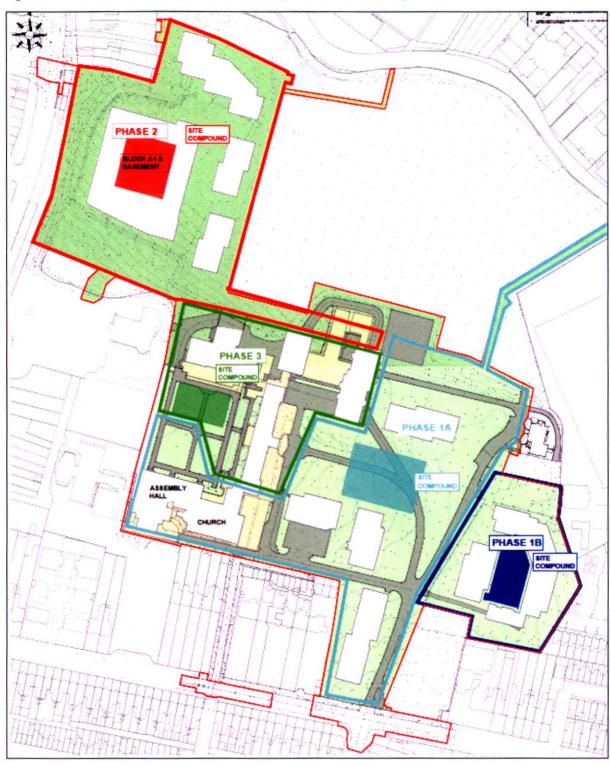
- Replacement windows, as required, will be fixed as the frame progresses to maintain watertightness;
- Internal works will commence, including services, carpentry, decoration, floor finishes and installation of fitted furniture.

### 5.2.2 Construction Compound

The indicative site compound locations of the construction compound are shown in **Figure 5.3**. Block site compounds will include as a minimum office, accommodation and welfare facilities. Compounds will be serviced with electrical power, water supply and toilet facilities. Haul routes and storage/staging areas will be established within each Block site area. Storage/staging areas will vary, depending on Block spatial allocation and their exact locations will be decided taking ecology, proximity to the River Tolka and archaeology into consideration. Fuel storage areas will not be located within 50m of any watercourse. Suitably robust hoarding will be erected around the perimeter of each storage/staging area; hoarding will typically be standard plywood to a height of 2.40m.

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Figure 5.3 Indicative Site Compound Locations (Source: BMCE, 2025)



## 5.2.3 Construction Access

Construction Site access will be provided for construction personnel and pedestrians via a number of entrances / exits on a phased basis, as illustrated in **Figures 5.4 – 5.6**, below.

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It is anticipated that the majority of construction vehicles accessing the sites will come from the M50 via the Drumcondra Road. Traffic bound for Blocks A1-A4 will enter via the existing Drumcondra site entrance gateway. Blocks B, C, D and E site traffic, will travel further down Drumcondra Road and turn left on to Clonliffe Road. Site access for Blocks B, C, D and E will be at the Clonliffe Road and Jones Road junction. The traffic signals at this junction may need to be temporarily modified in agreement with the DCC Transportation Department.

To exit the site and return to the M50, vehicles exiting the Drumcondra (left in and left out only) and Clonliffe Road site entrances will travel towards Annesley Road. From here the majority of vehicles will turn left towards Fairview and Marino and travel towards the M50 or alternatively travel along East Wall Road to the M1 tunnel.

The construction site access strategy will be such as to avoid / minimise impacts on members of the public. Construction traffic will be limited to specific haulage routes. Where possible, site deliveries will be scheduled in a staggered manner, avoiding peak traffic hours.

Access to neighbouring properties will be maintained throughout the proposed works. In order to minimise impacts to the public bus services using the QBC on Drumcondra Road, proximate works will be carried out at times agreed with TII, subject to the terms of the EIAR and relevant conditions attached to a grant of planning permission

To minimise non-essential traffic associated with the proposed works, construction personnel will be encouraged to travel to site using public transport or other sustainable modes of personal mobility, and on-site parking will be limited. In order to avoid overspill issues on the surrounding road network, proximate on-street parking will be managed / restricted in agreement with local residents and DCC.

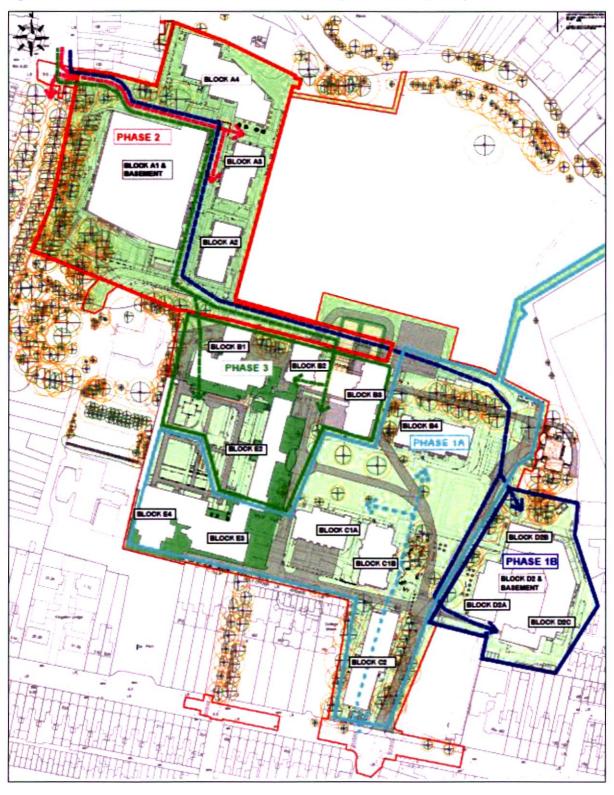
As stated in the Construction Management Plan (CMP), it will be a condition of works that maintenance of access to local roadways, footways and Dublin Bus stops will be secured. With the exception of hoarding construction works, temporary traffic management interventions, and utility connection works, it is not expected that the proposed works will impact on the use of bounding roadways and footways.

In advance of the commencement of works, contractors will be required to draft Traffic Management Plans in accordance with the requirements of the Department of Transport's 2018 manual, *Temporary Traffic Measures and Signs for Roadworks*, and in agreement with the Transportation Department of DCC. All contractors will also be required to appoint a Traffic Management Coordinator, who will be responsible for the oversight of Site traffic management and the implementation of the corresponding Traffic Management Plan.

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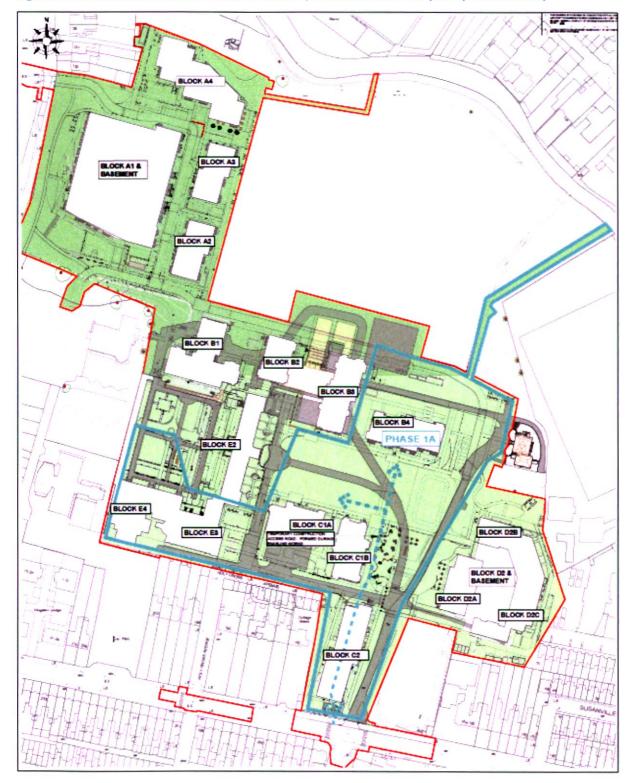
Figure 5.4 Construction Vehicle Access – Phases 1, 2 & 3 (Source: BMCE, 2025)



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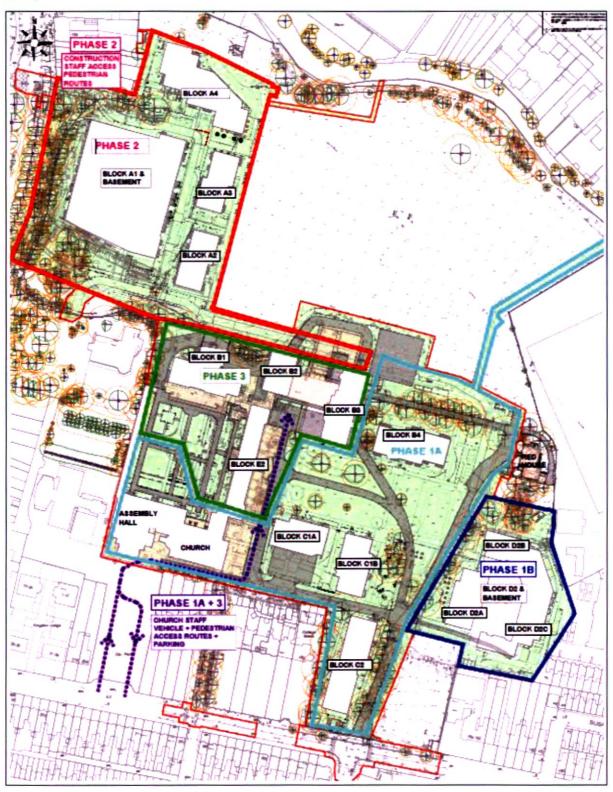
Figure 5.5 Construction Vehicle Access – Phase 1 (Construction of Temporary Access Road)



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Figure 5.6 Church staff vehicle, pedestrian access routes & parking – Phase 1 & 3 (Source: BMCE, 2025)



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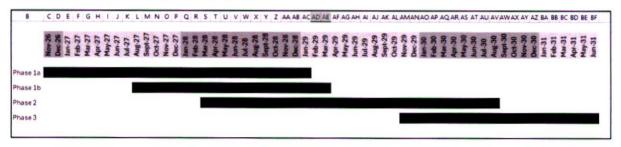
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### 5.2.4 Construction Phasing & Duration

It is estimated that new build construction (Phase 1 construction starting in Nov 2026 (associated site works might commence earlier in April 2026), will take approximately 60 months to complete. The construction programme is dependent on contractor appointment, market and other considerations. The overall delivery programme has been estimated on the basis that the construction of the development will be completed by a number of contractors under separate appointments. The project schedule above is therefore indicative only. Refer to **Figures 5.5 & 5.7**.

The first construction activity on the development will be a series of enabling works. Enabling works accounts for the provision of site, tree and invasive species protective means, construction of a temporary segregated onsite vehicular roadway and Block A1 basement excavation and piling. Each site/phase CMP, in keeping with the project CMP submitted as part of this planning application, will be prepared to reflect the specific details of relevant phase of works scheduled for completion and will be submitted to Dublin City Council (DCC).

Figure 5.7 Construction works phasing timeline



### 5.2.5 Excavation work

Excavation works will take place on each Block site to achieve formation levels for e.g., basement, car park ramp access, modification of existing services and the construction of new foundations and services. The volume of excavation required for the three basement car parks is estimated to total c.30,000m³. Most of this material will be natural clay material as identified in the site investigation report. There will also be significant quantities of topsoil. It is estimated that c. 10,000m³ of the excavated material will be stockpiled and re-used in other areas of the site. The balance will be disposed of off-site. The stockpiled topsoil - clay will be retained for landscaping and should be carefully stored in segregated piles on the site until subsequent reuse.

### 5.2.6 Construction Working Hours

Construction works will be limited to the times below, as per the Construction Management Plan (CMP) and Chapter 12 (Noise & Vibration), unless otherwise stipulated in the conditions to the planning permission:

Monday to Friday 07:00 to 18:00 hrs
 Saturdays 08:00 to 14:00 hrs
 Sundays and Public Holidays No work on site\*

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<sup>\*</sup>However, where required for specific circumstances (e.g. exceptional / emergency circumstances, such as connections to public service systems or utilities), it may be necessary for certain construction

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operations to be undertaken outside these times. The timing of such works will be agreed in advance with Dublin City Council.

#### 5.2.7 Construction Phase Plans

During the construction phase, all on-site contractors and subcontractors of the project and all works carried out regarding the upkeep and management of the development will also be required to adhere to the below identified Plans. These plans are being submitted under separate cover as part of this application in outline/draft form and will be finalised to reflect the specific, final terms of the EIAR in accordance with the terms of the planning permission and all conditions attached thereto. These include:

- Construction & Environmental Management Plan (CEMP);
- Construction Management Plan (CMP);
- Tree Protection Plan & Arboricultural Method Statement;
- Construction Traffic Management Plan;
- Construction Travel Plan;
- Construction Surface Water Management Plan;
- Community Liaison Plan
- Resource & Waste Management Plan.

## 5.3 Operational Phase

During the operational phase, all on-site contractors and subcontractors of the project and all works carried out regarding the upkeep and management of the development will also be required adhere to the below identified Plans. These plans are being submitted under separate cover as part of this application in outline/draft form and will be finalised to reflect the specific, final terms of the EIAR in accordance with the terms of the planning permission and all conditions attached thereto. It is proposed to implement the following plans of pertinence to the Environmental Impact Assessment Report (Volume 2).

During the operational phase, it is proposed to implement the following plans of pertinence to the Environmental Impact Assessment Report:

- Mobility Management Plan;
- Operational Waste Management Plan.

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### 6 Consultation

#### 6.1 Introduction

Consultation is a key element in the EIA process. The "carrying out of consultations" is included in the definition of EIA as set out in Article 1(a) of the amended EIA Directive. Consultation at various stages of the EIA process provides for timely and proportionate consideration of potential significant effects, early identification of stakeholder concerns, and facilitates public participation in the development consent process. Consultations may be statutory (i.e. required by law) or non-statutory / informal. Consultations may be undertaken by the Applicant or the Competent Authority, as appropriate and as required.

The United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (the Aarhus Convention), which came into force in October 2001, establishes a number of rights of the public with regard to the environment, including the right to access to environmental information and the right to access to public participation in environmental decision-making.

This non-technical summary (NTS) is particularly important in disseminating the information contained in the EIAR to the wider public and facilitating public participation in the development consent process. As stated in the EPA guidelines:

"Compliance with the Aarhus Convention requires that the structure, presentation and the non-technical summary of the EIAR, as well as the arrangements for public access, all facilitate the dissemination of the information contained in the EIAR. The core objective of public consultation is to ensure that the public is made as fully aware as possible of the likely environmental impacts of projects prior to a decision being made by the CA [Competent Authority]."

In addition, where required specialists have consulted relevant Departments and Bodies in order to acquire additional information to undertake the assessment.

#### 6.2 The LRD Process

On 17 December 2021, the Large-scale Residential Development (LRD) planning process came into effect under the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021, thereby replacing the previous Strategic Housing Development (SHD) process. The reform of the dedicated planning process for larger residential developments is intended to continue to expedite the delivery of housing, while restoring decision-making powers to Local Authorities. Certain elements of the previous SHD process, such as mandatory pre-application consultation with the Local Authority and mandatory decision timelines, have been retained; while others have been reformed.

In the Irish planning system, 'Large-scale Residential Development' refers to the following classes of development:

- Housing development of 100 or more units;
- Student accommodation development comprising 200 or more beds; or
- A combination of the two where the threshold is met for either element.

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LRD applications are restricted to residential zoned lands and do not apply to lands designated as Strategic Development Zones (SDZ). Any other proposed uses within an LRD are required to be compliant with the land use zoning objectives designated under the Local Authority Development Plan. Non-residential elements proposed within an LRD are restricted to 30% of the total floor area.

The stages in the LRD application process are outlined in Figure 6.1, below.

Figure 6.1 Overview of LRD application process



### 6.3 Consultation

Both the context and approach to the application site and the design rationale for the proposed development, have been subject to consultation with the DCC Planning Department under Section 247 of the *Planning and Development Act 2000* (as amended).

A formal pre-application meeting on the substance of the proposed development, was held on the 12<sup>th</sup> September 2024.

An LRD Opinion Request was subsequently submitted to DCC on 22<sup>nd</sup> November 2024 with an Opinion Meeting taking place on 18<sup>th</sup> December 2024 and an LRD Opinion issuing on 23<sup>nd</sup> January 2025. A response to the issues raised in the LRD Opinion is summarised in the *Response to LRD Opinion* prepared by Brady Shipman Martin with individual responses also contained in individual consultant reports.

Throughout all stage of pre-planning, discussions on the proposed development have taken place with the Council's Conservation Department, Traffic & Transportation Department, Drainage Department and the Parks Department.

## 6.4 Submission of LRD Application

The Stage 4 of the LRD application process, the submission of the planning application to the Planning Authority (Dublin City Council), will allow for public consultation. The Applicant will make copies of the application documents (including this Environmental Impact Assessment Report) available for public viewing on a dedicated website [www.holycrosscollegelrd.ie]. Members of the public, Prescribed Bodies and elected Council members may submit observations on the proposed development within five weeks from the date when the application was registered.

Planning Authority decisions on LRD applications may be appealed directly to An Bord Pleanála within four weeks of decision, by Applicants and parties that have submitted observations / submissions at Stage 4.

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## 7 Population & Human Health

This chapter of the Environmental Impact Assessment Report assesses the impacts of the construction and operational phases of the proposed development on population and human health. It has been prepared by Brady Shipman Martin in accordance with the relevant legislation and guidelines, including those from the Environmental Protection Agency (EPA) and Institute of Environmental Management and Assessment (IEMA). It has been informed by extensive desk study of relevant available data, including from the Central Statistics Office and Dublin City Council.

The site of the proposed development is located at Holy Cross College, Clonliffe Road, Dublin 3 and Drumcondra Road Lower, Drumcondra, Dublin 9. The site is located c. 1.7 km north of Dublin City Centre. It is bound by Drumcondra Road Lower, Archbishop's House (a Protected Structure), Mater Dei College and Crosscare Family Hub to the west; Clonliffe Road to the south; Cornmill Apartments and Belvedere College Rugby Grounds to the east; and by the River Tolka and potential future GAA facilities to the north. The site is situated in the administrative area of Dublin City Council, in the townlands of Clonliffe East and Clonliffe West.

The site comprises a number of green spaces and existing large institutional buildings associated with its current / former use (some of which are Protected Structures). The site has many large mature trees, giving it a unique character in the context of the surrounding residential areas and busy roads. The northern portion of the site extending to the River Tolka is set back from the busy Drumcondra Road, separated by large mature trees, while the southern part of the site fronts onto Clonliffe Road.

The CSO provides data on population and socio-economic aspects of the population at different levels from the State, county level, Local Electoral Area (LEA), individual Electoral Districts (ED) to Small Areas (SA) within each County. The 2016 Census undertaken by CSO provides detailed results and reports. Most recent census was undertaken in April 2022. CSO published preliminary results for 'Census of Population 2022' on 23 June 2022 (updated September 2022) which have been superseded by the main results published from May 2023 onwards. A series of themed reports, Small Area Population Statistics (SAPS) and Place of Work, School, College - Census of Anonymised Records (POWSCAR) and their detailed statistical tables have been provided as per the schedule set by CSO for May 2023 to December 2023. This chapter uses the most up to date and detailed statistical data that is available at the time of writing this chapter.

The site of the proposed development is situated mainly within the Electoral Division (ED) of Drumcondra South B. The adjoining EDs comprise of Drumcondra South A, Drumcondra South C, Botanic B, Botanic C and Ballybough A and Ballybough B. In the period between 2016 and 2022, the population in the administrative area of Dublin City Council (DCC) increased by 6.9% as compared to the previous increase of 5.1% between 2011 and 2016. At the ED level, all the EDs have shown growth, with the exception of Drumcondra South C between 2016 and 2022.

For the purposes of the proposed development, Brady Shipman Martin (BSM, 2025) has prepared a Community & Social Infrastructure and Childcare Facilities and School Demand Assessment Reports. These have been submitted under separate cover as part of the planning application.

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The duration of the construction phase is anticipated to be in the range of c. 60 months. In the absence of standard good construction practice and mitigation measures, the following potential impacts have been identified during the construction phase:

- Nuisance / health impacts related to exposure to dust;
- Impacts due to greenhouse gas emissions and climate vulnerability;
- Nuisance / disturbance related to elevated noise levels;
- Impacts on traffic / parking due to presence of construction traffic;
- Potential negative impacts on landscape and visual amenity due to presence of construction site and effects of construction activities (e.g. dust, dirt, stockpiling of soils, removal of vegetation, etc.);
- Health impacts related to improper waste management;
- Health impacts related to improper safety protocols, e.g. related to diversions of gas / power lines;
- Nuisance / impacts on residential amenity due to potential service / power outages;
- Impacts due to changes to daylight and sunlight availability on the receiving environment;
- Economic impacts related to construction employment / increased demand for goods and services.

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

- Potential impacts due to greenhouse gas emissions and climate vulnerability;
- Potential nuisance and disturbance of residents due to noisy building services plant and vehicular deliveries / collections within the site
- Potential negative impacts on journey characteristics due to additional operational phase traffic generated by the proposed development;
- Positive impacts on journey characteristics due to enhanced permeability across the site;
- Potential visual impacts due to completion of proposed development, establishing substantial new residential development;
- Potential positive impacts by retention and enhancement of the landscape and biodiversity value of the parts of the site;
- Potential positive impact of the proposals to retain and improve existing architectural and cultural heritage while demolishing structures which detract from that heritage, making it more accessible and visible to the local population and future occupants;
- Health impacts related to improper waste management;
- Potential impacts due to daylight and sunlight availability for the proposed development;
- Potential socio-economic impacts due to demand for goods and services locally;
- Positive socio-economic impacts due to provision of significant additional housing;
- Positive impacts on existing and new residents due to provision of new community amenities and facilities.

Assuming the proper and full implementation of the mitigation measures in the EIAR (summarised in relation to population and human health), the following significant, negative, residual impacts on population and human health are predicted:

The application of binding noise limits and hours of operation, along with implementation of appropriate noise and vibration control measures (as set out in Chapter 13), will ensure that noise and vibration impacts are minimised as far as practicable. Appropriate mitigation measures will be

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implemented in this regard. The predicted impact for the demolition and construction period will be negative, slight to significant and temporary, depending on the proximity of the works to the site boundary. For the remaining phases of construction work, structural development and general construction, the residual construction noise and vibration effects will be negative, slight to moderate and short-term depending on the proximity of the works to the site boundary. As such, it is considered that this potentially significant, negative, residual impact on the local population is commensurate with the proposed development and acceptable considering the net merit of the proposal.

The landscape and visual residual impacts on surrounding areas as a result of the proposed works, as follows:

- The impact of the construction phase on the wider townscape would be moderate, negative and short-term.
- The visual impact on the college lands, including Red House and the Archbishop's Residence would be very significant, negative and short-term.
- The visual impact from the construction phase on properties along the site boundary off Clonliffe Road, Susanville Road, and at Corn Mill and Distillery Apartment (i.e. to south and east) would be significant, negative and short-term at most. This effect will be most pronounced for properties with views towards the site from upper floors of mid-rise apartments, with the enclosed nature of the streetscapes for terraces providing a greater degree of screening.
- The visual impact from the construction phase on properties along the site boundary off Drumcondra Road Lower and Clonliffe Road west of the existing entrance (i.e. to south and west) would be significant, negative and short-term at most.
- The visual impact from the construction phase on properties off Richmond Road (i.e. to north) would be significant, negative and short-term at most. Generally, most properties are well screened by vegetation along the River Tolka corridor, however, the higher rise properties will afford clearer views over on to the Site and receptors will be significantly affected.
- The visual impact from the construction phase on Drumcondra Village and areas west of Drumcondra Road Lower (i.e. to west) would be slight to moderate, negative and short-term at most.
- The visual impact from the construction phase on wider surrounds (i.e. south of Clonliffe Road, east of Distillery Road and north of Richmond Road) would be slight, negative and short-term at most, decreasing with distance and frequent intervening screening from built form.

No other significant, negative residual impacts are predicted in relation to population and human health during the construction phase.

Assuming the proper and full implementation of the mitigation measures in the EIAR **no significant**, **negative**, **residual impacts** are predicted to occur during the operational phase <u>in the long-term</u>. However, there is the potential for **short-term significant**, **negative visual impacts** to viewpoints in the surrounding area upon the completion of the proposed development, but that these are expected to ameliorate to an **overall neutral to positive visual impact in the long-term**, once the proposed development has become established in its surroundings.

The net operational phase impact on population and human health is predicted to be positive, principally because the proposed development will deliver a high volume of high-quality housing in the

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context of an ongoing housing crisis, in a manner that is consistent with national and regional-level policy.

There is substantial interaction between Population & Human Health and other environmental topics addressed in the Environmental Impact Assessment Report, and mitigation measures of relevance to this element of the assessment have been set out throughout the report. These include measures in relation to community liaison, dust (Chapter 11 - Air Quality), noise (Chapter 13 - Noise & Vibration), construction site screening and tree protection (Chapter 14 - Landscape & Visual), traffic management (Chapter 19 - Traffic & Transportation), daylight and sunlight (Chapter 17 Microclimate – Daylight & Sunlight), wind (Chapter 18 Microclimate – Wind) and waste management (Chapter 20 - Material Assets Waste).

Additionally, a Construction & Environmental Management Plan (CEMP) and Construction Management Plan (CMP), both prepared by DCON Safety Consultants will be implemented during the construction phase, which will contain a range of measures to avoid / minimise adverse impacts on the local community. The appointed contractor will be responsible for the implementation of the CEMP & CMP. To ensure these documents remain fit for purpose, they will be maintained as live documents. The appointed contractor will be responsible for updating the CEMP & CMP, as required; e.g. to reflect the publication of relevant new or revised guidelines and / or new statutory requirements. The full schedule of environmental commitments (i.e. all mitigation measures set out in the CEMP and Environmental Impact Assessment Report as part of the planning application, as well as any applicable conditions of development consent) will be included in the CEMP & CMP by the appointed contractor.

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## 8 Biodiversity

Brady Shipman Martin has undertaken an appraisal of the likely effects on biodiversity (flora and fauna) resulting from the proposed development.

A separate Appropriate Assessment Screening Report (AASR) has been completed (under Article 6 of the EU Habitats Directive). The report is submitted under separate cover as part of this application and has concluded that that the proposed development at the Holy Cross College site, individually or in combination with another plan or project, will not have a significant effect on any European sites. This conclusion was reached without considering or taking into account mitigation measures or measures intended to avoid or reduce any impact on European sites. Therefore, the AA process – preparation of a Natura Impact Statement (NIS) – is not required.

## 8.1 Existing Environment

The overall site of the proposed development comprises a complex of habitats, including planted woodland (primarily along the western boundary) as well as open fields subject to limited management (and substantially outside the proposed development site itself). Other habitats include parkland and individual trees as well as large buildings and areas of hardstanding. Some parts of the site contain small pockets of unmanaged scrub.

The habitats present along the River Tolka corridor (outside the site boundary) comprise a mix of scrub and woodland habitats. These are of high ecological value and, of equal importance, serve as part of a continuous habitat corridor along the River Tolka, one of the key ecological features within the city. Immediately upstream of the open section of the river the bank comprises a vertical concrete wall. Immediately downstream the southern bank is similarly constrained.

The proposed development site is not under any wildlife or conservation designation. Furthermore, no rare, threatened or legally protected plant species are known to occur within the site and none have been recorded. No rare habitats or habitats of particularly high ecological value (i.e. International or National) are present at the site.

All of the bird species recorded are very common, and no red-listed species were noted. As noted in the stand-alone AA Screening Report the multi-season bird survey results clearly demonstrate that the proposed development site is of no significant value for any SCI species (i.e. Special Conservation Interest species listed in any European site) and there is no possibility of a significant effect arising on European sites as a result of potential impacts to populations of SCI bird species.

No evidence of badgers, hares, otters, amphibians or reptiles has been recorded within the subject site. No bat roosts have been recorded within the proposed development site.

The nearest European sites are the Special Areas of Conservation (SAC) and Special Protection Areas (SPA) associated with Dublin Bay: South Dublin Bay SAC (site code 000210), c. 3.9 km to the south east; North Dublin Bay SAC (site code 000206), c. 4.5 km to the east; South Dublin Bay and River Tolka Estuary SPA (site code 004024), c. 1.5 km to the east; and North Bull Island SPA (site code 004006), c. 4.5 km to the east. Full details of these and all other European sites with potential links to the proposed development site are contained in the AA Screening Report.

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The nearest site designated for nature conservation, not otherwise designated as a European site, is the Royal Canal proposed Natural Heritage Area (pNHA) (site code 002103). At its closest point, the pNHA is c. 300 m from the proposed development site.

#### 8.1.1 Overall ecological evaluation of the proposed development site

The proposed development site has been evaluated in accordance with the ecological resource valuations presented in the National Roads Authority/Transport Infrastructure Ireland Guidelines for Assessment of Ecological Impacts of National Road Schemes (NRA/TII, 2009 (Rev. 2)), as follows.

#### Species:

- Overall, given the habitats present, the site is of local importance (higher value) for commuting and foraging bats. It has no more than lower ecological value for roosting bats (no bat roosts are present) however the buildings and trees do offer some roosting potential.
- Overall, given the habitats present, the site is of no importance for wintering birds.
- Overall, given the habitats present, the site is of local importance (higher value) for breeding birds.
- Overall, given the habitats present, the site is of no more than local importance (lower value) for large mammals.
- Overall, given the habitats present, the site is of no more than local importance (lower value) for other fauna.

#### Habitats:

- The River Tolka, including the riparian corridor, is of County importance (and is a Key Ecological Receptor).
- The Mature mixed woodland (WD1) on the western side of the site is of local importance (higher value) (and is a Key Ecological Receptor).
- The majority of the habitats on the site, including the following, are of local importance (lower value) (and are not Key Ecological Receptors):
  - □ Species poor amenity grassland (GA2).
  - Scattered trees and parkland (WD5).
  - ☐ Flower beds and borders (BC4).
  - □ Ornamental and non-native shrubs (WS3).
  - □ The tree lines (WL2) on the southern part of the site.
  - □ The small block of broadleaved woodland (WD1) on the eastern side.
  - □ The area of disturbed ground (WS1/ED3) in the northwestern corner.
  - ☐ The grassland (GS2/GA1) outside the proposed development site (northern part of the wider site).
  - □ The spoil and bare ground (ED2) of recent origin (eastern part of the site).
  - □ The remainder of the site, being covered in buildings and artificial surfaces (**BL3**), − roads, paths and car parking), with planted areas/flower beds and borders, especially within the walled-cloister gardens (**BC4**).

Historically, four species listed on the Third Schedule of the Birds and Habitats Regulations 2011 as amended (Japanese knotweed, giant hogweed, Himalayan balsam and three-cornered leek) have been recorded at various points within the wider Holy Cross College lands (i.e. the wider Masterplan lands).

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A long-term management plan is currently being implemented by Invas Biosecurity in order to eradicate the plants from the wider site. The management plan will continue until all these invasive species are entirely eradicated from the site.

## 8.2 Predicted impacts

Based on the studies undertaken and the features of the proposed development, the AA Screening process concluded that none of the habitats and species listed as qualifying interests or special conservation interests in any European site designation will be affected by the proposed development and full AA, including the preparation of a Natura Impact Statement (NIS), is not required. The following paragraphs are extracted from the AA Screening report conclusions:

"In view of best scientific knowledge this report concludes that the proposed development at the Holy Cross College site, individually or in combination with another plan or project, will not have a significant effect on any European sites. This conclusion was reached without considering or taking into account mitigation measures or measures intended to avoid or reduce any impact on European sites.

It is considered that this report provides sufficient relevant information to allow the Competent Authority (Dublin City Council) to carry out an AA Screening under Section 177(U) of the Planning Acts and reach a determination, under Article 6 of the Habitats Directive, that the proposed development will not have any likely significant effects on European sites in light of their conservation objectives."

Similarly, there is no direct or indirect pathway between the proposed development site and any pNHA not already designated as a European site, and therefore no impacts on any pNHA will occur. Specifically, there is no possibility of any impacts on the Royal Canal pNHA.

The proposed development will result in the removal of some existing habitats of Local Importance (Lower Value) as well as alterations to parts of the site that are of Local Importance (Higher Value). Appropriate landscape planting, including the planting of semi-mature trees, as well as long-term biodiversity-focused landscape management will be undertaken within the site. A total of 93 trees will be removed in order to facilitate the development, however as set out in the Landscape Design Statement there will ultimately be an increase in total tree cover at the site with approximately 815 new trees being planted.

Two new surface water connections will be made from the proposed development to the River Tolka. This will require the creation of two new outfall channels. The locations of the outfalls have been selected by the design team (including the engineer, ecologist and landscape architect) in order to minimise any potential for impacts on the River Tolka. The outfalls will be constructed in consultation and agreement with IFI and set back from the riverbank. The vast majority of works will be on the bankside, right up and including the headwall detail, which is set back from the bank edge. All of the outfall works will be constructed in advance (with the riverbank unaffected), with the last piece of work to be done to 'break through' the riverbank for the last few metres to open new channels to the river itself. On completion of the works, the newly created outfall areas will be landscaped and planted to match the existing riverbanks.

The woodland strip along the western site boundary has a reasonably diverse structure and ground flora. Nonetheless, some management is proposed in order to increase the biodiversity of this area and to make it suitable for use as an amenity feature for the proposed development. This will involve the

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removal of some vegetation, and the introduction of new woodland planting suited to the site, as well as the creation of new low-impact paths and associated features. These features are sensitively designed and exploit existing features present in the woodland area. The proposed woodland management will ultimately result in a moderate, positive impact at the local level.

The continued management of invasive alien plant species at the site will also result in a moderate, positive impact at the local level.

While no bat roosts have been recorded on the proposed development site, there are several trees with roost potential and the felling of trees creates a risk of roost loss. Reduced vegetation will also lead to reduced insect abundance.

There will be a reduction in the vegetation cover and removal of the scrub and some of the mature trees that offer nest sites for the bird species noted within the site. Furthermore, in the absence of clear protocols for the protection of birds and their nests, there is potential for direct impacts on nesting birds and/or mortality of birds arising from the proposed development, should vegetation clearance take place during the bird nesting season, without accompanying bird-nesting surveys.

However, the landscaping proposed will ultimately lead to an increase in habitat (feeding and nesting) for birds.

No significant impacts on otters, badgers or any other large mammals within the site are expected as a result of the proposed development, either within the site or along the River Tolka corridor. Further, there will be no impacts on amphibians, reptiles, lepidoptera (butterflies and moths) or any other species groups as a result of the proposed development.

No significant impacts on wintering birds are expected as a result of the proposed development. As confirmed in the AA Screening Report (submitted as part of this application under separate cover), no Brent geese utilise the site and other SCI species use the site only on a very occasional basis. Similarly, there will be no impacts on bird species along the River Tolka corridor, such as kingfisher, grey wagtail, cormorant and heron.

There will be no significant impacts related to lighting, dust, surface water, flooding, foul water management or otherwise, in the context of biodiversity, as a result of the construction or operation of the proposed development.

## 8.3 Mitigation Measures

The proposed development incorporates a comprehensive landscape design, with biodiversity-focussed planting (incorporated design mitigation). The planting and long-term management proposed will enhance the biodiversity resource on the proposed development site by creating new, pollinator-friendly habitats.

Where feasible and practicable, the clearance of scrub and any other vegetation that may be suitable for use by small numbers of nesting birds, will be undertaken outside the bird nesting season.

The proposed development incorporates a comprehensive landscape design, with biodiversity-focussed planting. The planting and long-term management proposed will enhance the biodiversity resource on the proposed development site by creating new, pollinator-friendly habitats. All planting

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plans and landscaping proposals will further ensure that no invasive species are introduced, either deliberately or inadvertently, to the proposed development site.

The lighting design for the proposed development includes measures to prevent any impacts on commuting or foraging bats.

It is proposed to install a total of 18 no. bat and bird boxes of various types (including boxes designed to be used by swifts) both within the proposed development itself and within the retained woodland blocks. The reason for the installation of additional bat boxes is not to provide replacement roosts; rather, it is to augment the overall ecological value of the site. This will contribute to enhancing the ecological value of the proposed development.

## 8.4 Residual Impacts

Overall, although the proposed Project may have temporary negative impacts on biodiversity at the site level during the construction phase, these impacts will be fully mitigated over time to be rendered negligible. There will be a loss of feeding habitat within the subject site for bats and birds and a loss of nesting habitat for birds as a result of the proposed works. However, the very comprehensive landscape design proposed will ensure that vegetation will establish over time and these losses will be reduced considerably. There will be very limited (slight, negative) long-term impact upon bats within the site, given the relatively low level of bat activity noted. There will be no long-term impact on the River Tolka and its associated habitats, either as a result of the proposed Project itself or the installation of two new surface water outfalls to the watercourse.

## 8.5 Monitoring

A suitably experienced Project Ecologist (Ecological Clerk of Works) will be appointed for the duration of the construction phase and regular monitoring of all related works will take place to ensure the correct and full implementation of all mitigation measures. The Project Ecologist will ensure that all construction works take place in accordance with the development Construction Management Plan, Construction Environmental Management plan, the Construction Surface Water Management Plan and the mitigation measures set out in Volume 2 of the EIAR.

Should vegetation clearance be required during the bird nesting season, this work will take place only after the Project Ecologist has undertaken a survey to ensure that no active bird nests or recently fledged birds are present. Similarly, no evidence of roosting bats was recorded on the site during any of the comprehensive bat surveys undertaken. Regardless, a pre-construction survey will be required to ensure that any necessary tree felling or works to buildings continues to have no impact on roosting bats.

No long-term ecological monitoring is required, other than post-construction monitoring of the bat and bird boxes installed. The bat and bird boxes installed on the site will be checked annually for a period of five years post-completion of the works, to ensure that they continue to be accessible to these species.

On completion of construction, the lighting installed will be reviewed by the Project Ecologist and a bat specialist, to ensure that it is operating according to the approved specifications.

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## 9 Land, Soils, Geology & Hydrogeology

### 9.1 Introduction

This chapter of the EIAR evaluates the likely significant effects, if any, which the proposed development will have on Land, Soils, Geology and Hydrogeology. The chapter initially provides a description of the receiving environment of the site and the potential impacts of the development. When assessing the potential impacts, this assessment considers the significance of the environmental attributes, and the predicted scale, and duration of the likely effects.

### 9.2 Baseline Environment

The site of the proposed Project is located at Holy Cross College, Clonliffe Road, Dublin 3, and Drumcondra Road Lower, Drumcondra, Dublin 9. The Site is bounded to the west by the Drumcondra Road Lower, the south by the Clonliffe Road, to the east by residential buildings, and the north by the River Tolka. The proposed Project sits as part of a wider site Masterplan for the entire Holy Cross College lands which includes a permitted hotel development (DCC Reg. Ref.: 2935/20, ABP Reg. Ref.: PL29N.308193) and potential future GAA facilities.

The site has an undulating topography, with ground levels of 6.62 metres above ordnance datum (mAOD) recorded at BH17 to the north-west of the site, 12.46 mAOD to the south-west of the site (around the currently located buildings), and 7.74 mAOD at the south-east of the Site (GII, 2020). Natural topography would be presumed to be south to north towards the River Tolka. The setting is largely suburban, with residential buildings primarily surrounding the Site, and some commercial / light industrial buildings located to the north-east.

The application site contains a number of Protected Structures including The Seminary Building, Holy Cross Chapel, South Link Building, The Assembly Hall and The Ambulatory while the wider lands also include The Red House and the Archbishop's House (both Protected Structures). The application proposes the renovation and reuse of the Seminary Building and the South Link Building to accommodate residential units and the use of the existing Holy Cross Chapel, Assembly Hall and Cloister Garden for use as community/cultural uses.

## 9.3 Predicted Impacts of the Proposed Development

#### 9.3.1 Construction Phase

In absence of mitigation measures, the construction phase would present potential impacts associated with the following activities:

- Excavation and Infilling / levelling / landscaping.
- Accidental Spills and Leaks

Without the consideration and employment of mitigation measures, the potential impacts during the construction phase on land, soils, geology and hydrogeology (groundwater) are **negative**, **not significant** and **short term**.

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#### 9.3.2 Operational Phase

In absence of mitigation methods, the operational phase would present potential impacts associated with the following activities:

- Local loss of greenfield associated with the existing greenfield land (historically agricultural fields).
- There is a potential for leaks and spillages from vehicles along roads and in parking areas. Any accidental emissions of oil, petrol or diesel could cause soil / groundwater contamination if the emissions are unmitigated.
- Increase in hardstanding area will result in a localised alteration / reduction in recharge to the aquifer due to a decrease is local recharge (percolation to ground). This provides protection to the underlying aquifer but also reduces local recharge in this area of the aquifer. As the area of aquifer is large this reduction in local recharge will have no significant change in the natural hydrogeological regime.

Groundwater abstraction does not form part of the proposed Project. There will be no impact on local or regional groundwater resources (abstraction) as a result of the proposed Project.

In the absence of mitigation measures (or design measures) the potential impacts during the operational phase on land, soils, geology and hydrogeology are **neutral**, **imperceptible**, and **long-term**.

## 9.4 Mitigation and Residual Effects (Post-Mitigation)

#### 9.4.1 Construction Phase

In order to reduce impacts on the soils, geological and hydrogeological environment, a number of mitigation measures will be adopted as part of the construction works on site.

- Implementation of a Construction & Environmental Management Plan (CEMP).
- Management of excavations, stockpiled materials, and suspended solids.
- Management and disposal of accumulated rainfall/surface water/groundwater.
- Management of hydrocarbons and other construction chemicals.
- Management of wastewater.
- Regular inspection of surface water run-off and sediment controls.
- Regular inspection on activities, such as refuelling and pouring concrete to ensure there are no unintentional leaks to ground.

The implementation of the mitigation / remedial and monitoring measures detailed in Section 9.6 and 9.8 (respectively) in Chapter 9 will ensure that the potential impacts on land, soils, geology, hydrogeology during the construction phase are adequately mitigated. The residual effect on surface water quality during the construction phase is considered to be **neutral**, **imperceptible** and **short-term**.

#### 9.4.2 Operational Phase

During the operational phase there is no requirement for bulk storage of petroleum products. Due to the nature of the proposed development in operation there is risk of potential leaks and spillages of fuel and oil from carparking areas.

The operational phase for the proposed development does not involve any abstraction of groundwater or any significant or long-term dewatering.

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The design has taken account of the potential impacts of the development on surface water quality; measures have been incorporated in the design to mitigate these potential impacts. The proposed development design includes hardstand cover across the site and as set out in the Barrett Mahony Civil & Structural Consulting Engineers Infrastructure Planning Report (2025). The proposed development stormwater drainage network design includes sustainable drainage systems (SuDS). These measures by design ensure the stormwater leaving the site is of a suitable quality prior to final outfall which discharges into the River Tolka to the north and Public Sewer on Clonliffe Road to the south of the site, respectively. SuDS are drainage systems that are environmentally beneficial, causing minimal or no long-term detrimental damage. The proposed/existing surface water drainage system for this development has been designed as a sustainable urban drainage system and uses underground attenuation tanks, detention storage, intensive/extensive blue green roof systems, together with a flow control device (hydrobrake), swales, and bioretention areas (rainwater harvesting & tree pits) to:

- Treat runoff and remove pollutants to improve quality
- Restrict outflow and control quantity
- Increase amenity value

The implementation of the mitigation / remedial and monitoring measures detailed in Section 9.6 and 9.8 (respectively) of Chapter 9 will ensure that the potential impacts on land, soils, geology, hydrogeology once the proposed development is constructed and operational are adequately mitigated. The residual effect on land, soils, geology and hydrogeology during the operational phase is considered to be **neutral**, **imperceptible** and **long-term**.

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## 10 Hydrology

### 10.1 Introduction

This chapter of the EIAR evaluates the likely significant effects, if any, which the proposed development will have on Hydrology. The chapter initially provides a description of the receiving environment of the site and the potential impacts of the development. When assessing the potential impacts, this assessment considers the significance of the environmental attributes, and the predicted scale, and duration of the likely effects.

### 10.2 Baseline Environment

The site of the proposed Project is located at Holy Cross College, Clonliffe Road, Dublin 3, and Drumcondra Road Lower, Drumcondra, Dublin 9. The Site is bounded to the west by the Drumcondra Road Lower, the south by the Clonliffe Road, to the east by residential buildings, and the north by the River Tolka. The proposed Project sits as part of a wider site Masterplan for the entire Holy Cross College lands which includes a permitted hotel development (DCC Reg. Ref.: 2935/20, ABP Reg. Ref.: PL29N.308193) and potential future GAA facilities.

The site has an undulating topography, with ground levels of 6.62 metres above ordnance datum (mAOD) recorded at BH17 to the north-west of the site, 12.46 mAOD to the south-west of the site (around the currently located buildings), and 7.74 mAOD at the south-east of the Site. Natural topography would be presumed to be south to north towards the River Tolka. The setting is largely suburban, with residential buildings primarily surrounding the Site, and some commercial / light industrial buildings located to the north-east.

The main hydrological feature of the area is the River Tolka. The River Tolka runs along / across parts / portions of the northern boundary of the site in an easterly direction, which in turn flows in a general alternating southeastern-easterly direction before its outfall to the Tolka Estuary and Dublin Bay circa 1.6 km southeast of the subject development site.

The site has a direct hydrological linkage / connection to the Tolka Estuary transitional waterbody and the downstream Dublin Bay coastal waterbody via overland flow to the adjacent River Tolka partially bounding the site to the North.

## 10.3 Predicted Impacts of the Proposed Development

#### 10.3.1 Construction Phase

In the absence of mitigation measures, the construction phase would present predicted impacts associated with the following activities:

- Impact to surface water quality from sediment run-off or accidental hydrocarbon leaks from construction vehicles and cementing works.
- Increased run-off rate impacting surface water flow and quantity.
- Excavation and Infilling.
- Accidental Spills and Leaks.

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Without the consideration and employment of mitigation measures, the potential impacts during the construction phase on hydrology are **negative**, **not significant** and **short-term**.

### 10.3.2 Operational Phase

In the absence of mitigation methods, the operational phase would present potential impacts associated with the following activities:

- Increase in hardstanding, resulting in increased rate of surface water flow runoff.
- Accidental hydrocarbon leaks (vehicles and bunded oil tanks) on site resulting in contaminated water quality.
- Increase in foul water discharge effluent which will be treated at Ringsend WwTP prior to discharge at Dublin Bay.
- Local loss of greenfield land associated with the existing grassland fields.

In the absence of mitigation measures (or design measures) the potential impacts during the operational phase on hydrology are **negative**, **not significant**, and **long-term**.

## 10.4 Mitigation and Residual Effects (Post-Mitigation)

#### 10.4.1 Construction Phase

In order to reduce impacts on the hydrological environment, a number of mitigation measures will be adopted as part of the construction works on site.

- Implementation of a Construction & Environmental Management Plan (CEMP) and Construction & Management Plan (CMP).
- Management of excavations, stockpiled materials, and suspended solids.
- Management and disposal of accumulated rainfall/surface water.
- Management of hydrocarbons and other construction chemicals.
- Management of foul wastewater.
- Regular inspection of surface water run-off and sediment controls.
- Regular inspection on activities, such as refuelling and pouring concrete to ensure there are no unintentional leaks to ground.

The implementation of the remedial / mitigation and monitoring measures detailed in Section 10.6 and 10.8 (respectively) in Chapter 10 will ensure that the potential impacts on hydrology during the construction phase are adequately mitigated. The residual effect on Hydrology and surface water quality during the construction phase is considered to be **neutral**, **imperceptible** and **short-term**.

#### 10.4.2 Operational Phase

The proposed does not include any long term or significant dewatering. During operation measures there is no requirement for bulk storage of petroleum products. Due to the nature of the proposed development in operation there is minimal risk of significant potential leaks and spillages of fuel and oil. Any accidental release will more likely be intercepted by stormwater drainage, rather than directly impact groundwater or directly impact the River Tolka and downstream Tolka Estuary, due to the hardstand and drainage infrastructure strategy / design proposed.

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The design has taken account of the potential impacts of the development on surface water quality; measures have been incorporated in the design to mitigate these potential impacts.

The proposed development design includes the introduction of additional hardstand cover across the site. The proposed development stormwater drainage network design includes sustainable drainage systems (SuDS). These measures by design ensure the stormwater leaving the site is of a suitable quality prior to discharge into the River Tolka and the existing public drainage network (stormwater sewer) to the south of the site at Clonliffe Road. SuDS are drainage systems that are environmentally beneficial, causing minimal or no long-term detrimental damage. The design of the development and drainage infrastructure will ensure that the run-off rate is similar / equivalent to greenfield run-off. The proposed surface water drainage system uses underground attenuation systems together with a flow control device (hydrobrake), permeable paving, blue green roofs (intensive & extensive), bioretention areas, rain gardens, tree pits to:

- Treat runoff and remove pollutants to improve quality
- Restrict outflow and control quantity
- Increase amenity value

The Proposed Development has been designed to avoid any development or disturbance of land within Flood Zones A and B.

The DCC FRA project considers the subject site to be low risk of pluvial flooding as it is not located in low lying areas. The proposed SuDS measures will reduce the risk of flooding downstream of the subject site. The proposed surface system will be designed for the 1 in 100 year storm event plus 20% for climate change, in line with DCC Drainage Division guidelines. No habitable floors of buildings will be at risk of flooding by any surface water ponding. Internal finished floor levels are set at a minimum of 150mm above highest external surface levels in the vicinity.

Therefore, the risk of pluvial flooding is considered low, due to existing and proposed measures in place. The existing drainage on site will be improved as a result of the proposed works including the removal of the surface drainage system from the combined network on Clonliffe Road to substantially reduce both the peak and volume of runoff into the network. The proposed storm attenuation facilities will restrict flows to Qbar into the River Tolka which will further reduce the risk of pluvial flooding on site and downstream.

Waterproof construction methods and measures will be employed to seal and prevent ingress of ground water into the basement. No buildings, ancillary buildings, roads, or footpaths are located in the flood zone. Only the 2 no. surface water outfall pipes are located in the flood zone, and are required here in order to reach the River Tolka. All finished floor levels are at grade and therefore are elevated well above the flood level. Internal finished floor levels are set at a minimum of 150mm above highest external surface levels in the vicinity, any runoff or ponding will be retained on access road and car park surfaces. This measure during the unlikely event is considered appropriate for the nature of the development.

No further mitigation measures are required during the operational phase. The implementation of the remedial / mitigation and monitoring measures detailed in Section 10.6 and 10.8 (respectively) of Chapter 10 will ensure that the potential impacts on Hydrology once the proposed development is

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constructed and operational are adequately mitigated. The residual effect on hydrology during the operational phase is considered to be **neutral**, **imperceptible** and **long-term**.

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## 11 Air Quality

The assessment of Air Quality is contained within Chapter 11. The air quality assessment has focussed on:

- Potential construction dust emissions and impacts to nearby sensitive receptors such as residential properties, schools, hospitals, etc.
- Potential vehicle emissions from traffic accessing the site for construction works and during operation.

## 11.1 Existing Environment

Baseline data and data available from similar environments indicates that levels of nitrogen dioxide (NO2), particulate matter less than 10 microns (PM10) and particulate matter less than 2.5 microns (PM2.5) are generally well below the current National and European Union (EU) ambient air quality standards.

## 11.2 Impact Assessment

### 11.2.1 Do Nothing Scenario

In the Do-Nothing scenario, ambient air quality at the site will remain as per the baseline and will change in accordance with trends within the wider area, including influences from potential new developments in the surrounding area, changes in road traffic, etc. As a result, air quality impacts are expected, even without the proposed development.

#### 11.2.2 Construction Phase

An assessment of the potential dust impacts as a result of the construction phase of the proposed development was carried out based on the UK Institute for Air Quality Management 2024 guidance document 'Guidance on the Assessment of Dust from Demolition and Construction'. This established the sensitivity of the area to impacts from construction dust in terms of dust soiling of property and human health effects. The surrounding area was assessed as being of high sensitivity to dust soiling and of low sensitivity to dust-related human health effects.

The sensitivity of the area was combined with the dust emission magnitude for the site under four distinct categories: demolition, earthworks, construction and trackout (movement of vehicles) to determine the mitigation measures necessary to avoid significant dust impacts. It was determined that there is a high risk of dust related impacts associated with the proposed development. In the absence of mitigation there is the potential for **direct, short-term, negative** and **slight** impacts to air quality, which is an overall **not significant** impact in EIA terms.

In addition, construction phase traffic emissions have the potential to impact air quality, particularly due to the increase in the number of HGVs accessing the site. Construction stage traffic did not meet the scoping criteria for a detailed modelling assessment outlined in Transport Infrastructure Ireland's 2022 guidance document 'Air Quality Assessment of Specified Infrastructure Projects – PE-ENV-01106'. As a result, a detailed air assessment of construction stage traffic emissions has been scoped out and

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the construction stage traffic emissions will have a **short-term**, **neutral** and **not significant** impact on air quality, which is an overall **not significant** impact in EIA terms.

#### 11.2.3 Operational Phase

Operational phase traffic has the potential to impact air quality due to vehicle exhaust emissions as a result of the increased number of vehicles accessing the site. Operational stage traffic emissions were calculated at representative worst-case receptors in the area, and it was determined that concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> will increase by an imperceptible amount as a result of the proposed development. Operational stage traffic emissions will have a **long-term**, **direct**, **negative and not significant** impact on air quality.

#### 11.2.4 Cumulative Impact

There is the potential for cumulative impacts to air quality should the construction phase of the proposed development coincide with that of other developments within 500 m of the site. A review of proposed/permitted developments in the vicinity of the site was undertaken. A review of recent planning permissions for the area was conducted and it was found that there were a number of relevant sites for which cumulative impacts may occur should their construction phase and that of the proposed development overlap. There is the potential for cumulative construction dust impacts should the construction phases overlap with that of the proposed development.

The dust mitigation measures outlined in Section 11.6.1 of Chapter 11 will be applied during the construction phase which will avoid significant cumulative impacts on air quality. With appropriate mitigation measures in place, the predicted cumulative impacts on air quality associated with the construction phase of the proposed development is deemed **direct, short-term, negative, localised** and **not significant**.

Operational phase direct impacts on air quality associated with the proposed development are predicted to be **direct**, **long-term**, **localised**, **negative** and **not significant**.

Overall, no significant cumulative impacts to air quality are predicted during the construction or operational phases of the proposed development

## 11.3 Mitigation

#### 11.3.1 Construction Phase

Detailed dust mitigation measures are outlined within Section 11.6.1 of Chapter 11 to ensure that no significant nuisance as a result of construction dust emissions occurs at nearby sensitive receptors. Once these best practice mitigation measures, derived from the Institute for Air Quality Management 2024 guidance 'Guidance on the Assessment of Dust from Demolition and Construction' as well as other relevant dust management guidance, are implemented the impacts to air quality during the construction of the proposed development are considered, **short-term**, **direct**, **negative** and **not significant** in EIA terms, posing no nuisance at nearby sensitive receptors (such as local residences).

#### 11.3.2 Operational Phase

No site-specific mitigation measures are proposed for the operational phase. The impact to air quality has been assessed as long-term, direct, localised, negative and not significant.

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## 11.4 Residual Impact Assessment

When the dust mitigation measures are implemented, the residual effect of fugitive emissions of dust and particulate matter from the site will be **short-term**, **direct**, **localised**, **negative** and **not significant**.

The impact to air quality during the operational phase of the proposed development as a result of emissions from vehicles accessing the site have been assessed as **long-term**, **direct**, **localised**, **negative** and **not significant**.

## 11.5 Monitoring

### 11.5.1 Construction Phase

The monitoring measures in Section 11.8.1 of Chapter 11 are proposed to ensure the dust mitigation measures are working satisfactorily.

#### 11.5.2 Operational Phase

There is no monitoring recommended for the operational phase of the proposed development as impacts to air quality are predicted to be not significant.

#### 11.6 Conclusion

This chapter has assessed the predicted impacts of the construction and operational phases of the proposed development on air quality. The cumulative impacts of the proposed development and surrounding developments have also been considered.

Provided all mitigation measures as set out in this chapter, the overall predicted effect of the proposed development is not significant.

The following table summarises the identified likely significant effects during the construction and operational phases of the proposed development following the application of mitigation measures.

Construction Phase									
Likely Significant Effect		Quality	Significar	ce Duratio	n Type				
Impact of construction dust from demolition, earthworks, construction and trackout in terms of dust soiling, and human health		Negative	Not significan	Short- t term	Direct				
Impact of construction phase traffic on air quality		Neutral	Not significan	Short- t term	Direct				
Operat	ional Phase	•							
Likely Significant Effect	Quality	Signif	Significance Duration		Type				
Impact of operational phase traffic on air quality	Negative	Not significant Long-te		Long-term	Direct				

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## 12 Climate

The assessment of Climate is contained within Chapter 12. The climate assessment has incorporated the following assessments:

- The potential greenhouse gas emissions during the demolition, construction and operational phases of the development.
- The vulnerability of the project to climate change, including considerations for increased rainfall and other projected climate impacts.
- The design measures to enhance the project's resilience to future climate risks, such as incorporating drainage systems for increased rainfall.

# 12.1 Existing Environment

The existing climate baseline can be determined by reference to data from the EPA on Ireland's total greenhouse gas (GHG) emissions and alignment with Ireland's 2030 sectoral emissions ceilings and carbon budgets. The EPA state that Ireland had total GHG emissions of 58.83 Mt CO<sub>2</sub>e in 2023. This is 2.22 Mt CO<sub>2</sub>e higher than Ireland's annual target for emissions in 2023. EPA projections indicate that Ireland has used 63% of the 295 Mt CO<sub>2</sub>e Carbon Budget for the five-year period 2021-2025. Further reduction measures are required to stay within the budget requirements.

## 12.2 Impact Assessment

The potential impacts on climate have been assessed in two distinct ways – a greenhouse gas assessment (GHGA) and a climate change risk assessment (CCRA). The GHGA quantifies the GHG emissions from a project over its lifetime and compares these emissions to relevant carbon budgets, targets and policy to contextualise magnitude. The CCRA considers a projects vulnerability to climate change and identifies adaptation measures to increase project resilience.

The impact of the construction and operation of the proposed development on Ireland's total national greenhouse gas emission is compared to Ireland's 2023 total greenhouse gas emissions, the relevant sectoral emissions ceilings and 2030 carbon budgets. Any adverse impacts are predicted to primarily occur during the construction phase, with the dominant sources of greenhouse gas emissions due to the development due to the embodied carbon associated with the building materials for the proposed development.

### 12.2.1 Do Nothing Scenario

In the Do-Nothing scenario, the site will remain as per the baseline and will change in accordance with trends within the wider area (including influences from potential new developments in the surrounding area, changes in road traffic, etc).

As the site is zoned for development, it is likely that in the absence of the proposed development a development of a similar nature would occur. Therefore, the predicted climate impacts within this report are likely to occur even in the absence of the proposed development.

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## 12.2.2 Greenhouse Gas Assessment

#### 12.2.2.1 Demolition & Construction Phases

The GHG emissions associated with the construction of the proposed development was calculated using the online OneClick LCA Tool. The GHG emissions associated with the proposed development are predicted to be a small fraction of Ireland's 2030 carbon budget of 27.7 MtCO<sub>2</sub>e and the sectoral emissions ceilings for the Industry, Waste and Transport sectors. The proposed development will incorporate best practice mitigation measures which will aim to reduce climate impacts during construction and once the development is operational.

### 12.2.2.2 Operational Phase

GHG emissions during the operational phase due to road traffic were assessed. The changes in traffic volumes associated with the operational phase of the development were substantial enough the meet the assessment criteria requiring a detailed climate modelling assessment, as per Transport Infrastructure Ireland (TII) 2022 guidance "PE-ENV-01104: Climate Guidance for National Roads, Light Rail and Rural Cycleways (Offline & Greenways) — Overarching Technical Document". There will be a slight increase in the traffic on the local road network which will result in some minor increases in CO<sub>2</sub>e emissions. These have been assessed as a small fraction of Ireland's transport sector 2030 emissions ceiling.

Impacts to climate from the demolition, construction and operational phases are deemed **direct, long-term, negative** and **slight,** which is considered **not significant**.

## 12.2.3 Climate Change Risk Assessment

A CCRA was conducted to consider the vulnerability of the proposed development to climate change, as per the TII 2022 PE-ENV-01104 guidance. This involves an analysis of the sensitivity and exposure of the development to future climate hazards which together provide a measure of vulnerability. The hazards assessed included flooding (coastal, pluvial, fluvial); extreme heat; extreme cold; drought; extreme wind; lightning, hail and fog; wildfire and landslides. The proposed development is predicted to have at most low vulnerabilities to the various climate hazards and therefore climate change risk is considered direct, long-term, negative and imperceptible, which is overall not significant with regard to the demolition, construction and operational phases.

Overall, no significant impacts to climate are predicted during the demolition, construction and operational phases of the proposed development.

## 12.2.4 Cumulative Impact

With respect to the requirement for a cumulative assessment PE-ENV-01104 states that "the identified receptor for the GHG Assessment is the global climate and impacts on the receptor from a project are not geographically constrained, the normal approach for cumulative assessment in EIA is not considered applicable. By presenting the GHG impact of a project in the context of its alignment to Ireland's trajectory of net zero and any sectoral carbon budgets, this assessment will demonstrate the potential for the project to affect Ireland's ability to meet its national carbon reduction target. This assessment approach is considered to be inherently cumulative".

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As a result, the cumulative impact of the proposed development in relation to GHG emissions is considered **direct, long-term, negative** and **slight**, which is overall **not significant** in EIA terms.

### 12.2.5 Mitigation

### 12.2.5.1 Incorporated Design

A number of mitigation measures have been incorporated into the design of the proposed development. The development will comply with the requirements of the Near Zero Energy Building (NZEB) Standards and will achieve a Building Energy Rating (BER) in line with the NZEB requirements. Additionally, other measures have also been incorporated into the design of the proposed development to mitigate the impacts of future climate change. To address future climate change risks, the design includes mitigation measures such as adequate drainage systems to manage a 20% increase in rainfall, consistent with the 'Medium Risk' RCP4.5 scenario (2021-2050).

### 12.2.5.2 Demolition & Construction Phases

A number of best practice mitigation measures are proposed for the construction phase of the proposed development to ensure that impacts to climate are minimised. These mitigation measures include a demolition and construction program, determine material reuse and waste recycling opportunities (in compliance with the EU Taxonomy Regulation 2020/852) and identifying and implementing lower carbon material choices and quantities during detailed design.

#### 12.2.5.3 Operational Phase

During the operational phase, emissions will be minimal. The primary focus will be on operational energy usage. The design intent at present for hot water, heating and cooling system designs are based on a combination of highly efficient air source and water to water heat pumps with no fossil fuels being consumed throughout the proposed development, avoiding the production of large amounts of local pollution within an urban environment. Sustainable travel modes will be encouraged through support facilities for cycling, minimal onsite parking and infrastructure for electrical vehicle charging points.

### 12.2.6 Residual Impact Assessment

The impact to climate due to a proposed development must be assessed as a whole for all phases. The proposed development will result in some impacts to climate through the release of GHGs. TII PE-ENV-01104 guidance references the IEMA guidance which states that the crux of assessing significance is "not whether a project emits GHG emissions, nor even the magnitude of GHG emissions alone, but whether it contributes to reducing GHG emissions relative to a comparable baseline consistent with a trajectory towards net zero by 2050". The proposed development has proposed some best practice mitigation measures and is committing to reducing climate impacts where feasible. Once mitigation measures are put in place, the effect of the proposed development in relation to GHG emissions is considered direct, long-term, negative and slight, which is overall not significant in EIA terms.

In relation to climate change vulnerability, it has been assessed that there are no significant risks to the proposed development because of climate change. The residual effect of climate change on the proposed development is considered **direct, long-term, negative** and **imperceptible**, which is overall **not significant** in EIA terms.

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## 12.2.7 Monitoring

Monitoring and reporting of the embodied carbon in the construction phase will be conducted. The aim of monitoring will be to seek further ways to minimise climate impacts.

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## 13 Noise & Vibration

### 13.1 Introduction

The existing noise climate has been surveyed during both daytime and night-time periods and has been found to be typical of an urban area. Prevailing noise levels are primarily due to local road traffic movements and road traffic on the N1 and Clonliffe Road.

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

### 13.2 Construction Phase Assessment

During the construction phase of the proposed development, there is the potential for noise effects on nearby noise sensitive properties due to noise emissions from site activities.

The initial construction phases have the highest potential for noise effects, it is predicted that a negative, moderate to very significant and temporary impact will occur at sensitive receptors that are within 40m of the construction sites. Once the initial construction phases have been completed on site, the effects due to general construction works are predicted to be negative, slight to moderate and short-term.

Vibration impacts are assessed as **negative**, **slight to moderate and temporary** in terms of potential structural effects within 40m of vibration activities and **negative**, **moderate to significant and temporary** for human response, with mitigation measures proposed to minimize disturbance.

## 13.3 Operational Phase Assessment

During the operational phase, the key potential noise sources including increases in road traffic and mechanical plant noise emissions have been assessed and found to be **not significant**. The assessment has indicated that, none of these will increase the existing noise climate sufficiently so as to be likely to cause a disturbance. Noise levels during the operation of the proposed scheme are predicted to nominally remain unchanged when compared to the existing scenario and are all within the recommended noise criterion for day and night-time periods.

## 13.4 Inward Impact Assessment

In line with current best practice a detailed inward noise impact assessment on the proposed residential units within the development has also been completed. Based on the recommended guidance, i.e. Professional Guidance on Planning & Noise (ProPG), the assessment concludes that no mitigation is required beyond standard double glazing to meet the internal noise criteria.

## 13.5 Mitigation Measures

During demolition and construction, best practice measures will be implemented to control noise and vibration. These will follow established guidance and include the use of quieter machinery, controlling noise at the source, using temporary barriers where needed, restricting working hours, keeping nearby residents informed, and carrying out monitoring to ensure thresholds are not exceeded.

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To prevent noise impacts during the operational phase, plant rooms and mechanical equipment will be carefully designed and located to ensure that noise levels at nearby sensitive locations remain within acceptable thresholds. Measures include selecting quieter equipment, using acoustic screens, attenuators, and silencers where needed, and ensuring all plant is well-maintained and free of intrusive tones. These measures will ensure compliance with noise criteria of 50 dB during the day and 45 dB at night at nearby homes and other sensitive sites.

## 13.6 Residual Impacts

For the duration of the demolition and construction period, residual construction noise and vibration effects will be **negative**, **slight to significant and temporary**, depending on the proximity of the works to the site boundary. may cause temporary noise and vibration impacts at nearby properties, depending on how close the works are to the site boundary. However, with strict thresholds on working hours and the use of recognised noise and vibration control measures, these impacts will be reduced as much as reasonably possible. For the remaining phases of construction work, structural development and general construction, the residual construction noise and vibration effects will be **negative**, **slight to moderate and short-term** depending on the proximity of the works to the site boundary.

Once in operation, noise from building services (such as ventilation and mechanical equipment) is expected to stay well within the required thresholds. As a result, any ongoing noise impact from this equipment will be **negative**, **not significant and permanent**. The change in noise levels associated with additional traffic is predicted to be imperceptible along the existing road network. In the context of the existing noise environment, the overall effects from noise contribution of increased traffic is considered to be of **neutral**, **imperceptible and long term effect** to nearby noise sensitive locations.

## 13.7 Cumulative Impacts

Construction at nearby sites may occur at the same time as this development, which could lead to slightly higher noise levels in the surrounding area, particularly for properties located close to multiple sites. These cumulative impacts are expected to be **short-term**, **negative and slight to significant** depending on proximity. Coordination between construction teams is recommended to help manage and minimise these effects

No significant cumulative noise impacts are expected once the development is complete. Noise thresholds for building services have been set to ensure they do not raise background noise levels at nearby sensitive locations. These thresholds already account for all plant operating on site. In terms of traffic, the assessment considered wider development in the area, so the predicted noise levels already reflect the cumulative effect of increased traffic.

If the development does not go ahead, noise levels in the area are expected to remain as they are now, with no change to the existing sound environment.

### 13.8 Conclusion

Subject to good working practice as recommended in the EIAR Chapter, noise associated with the construction phase is not expected to exceed the recommended threshold values for noise-sensitive locations beyond 40m from the site boundary during the main building works phase and with mitigation

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no significant effects are expected. At distances less than 40m from the boundary, construction noise has the potential to exceed the recommended threshold values depending on the activity involved. A variety of standard proven best practice noise mitigation is proposed together with noise monitoring to reduce the noise impacts as far as reasonably practicable.

The operational phase of the proposed development has also been assessed, including an inward noise impact analysis. Provided that the design criteria and mitigation measures outlined in this report are implemented, no significant noise effects are predicted during the operational phase.

No significant vibration effects are associated with the operation of the site.

In summary, the noise and vibration impact of the proposed development is not significant in the context of current national guidance.

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# 14 Landscape & Visual

The assessment of Landscape and Visual Character is contained within Chapter 14 of Volume II of the EIAR. The assessment was informed by a desk-based review of the site's planning and landscape context, supported by a detailed site survey examining local character, existing vegetation, and views. A visual appraisal of the surrounding townscape and sensitive receptors was undertaken, with photomontages prepared from 52 representative viewpoints. These illustrate how the proposed development will appear once constructed and in context with existing and permitted development.

The proposed development at Holy Cross College in Dublin involves building a new residential neighbourhood with 1,131 apartments, green spaces, and community facilities on a historically significant site. It includes renovation of several protected structures (like the Seminary Building and Holy Cross Chapel) and new buildings up to 13 storeys high.

The proposed development has been guided by the Holy Cross College Masterplan and incorporates a sensitive approach to urban design, building height, and landscape integration. While the development introduces higher-density, urban character to a formerly enclosed institutional site, the retention of mature trees, provision of open space, and reuse of heritage buildings will help support a cohesive landscape setting. Over time, with the maturity of landscape measures and with the integration of high-quality public realm and mitigation, it is anticipated that any negative effects on landscape character and visual amenity will generally reduce in significance and become neutral or positive. The proposal is consistent with the objectives of the Dublin City Development Plan and the Z12 land use zoning.

### 14.1.1 Existing Environment

The Holy Cross College site comprises approximately 8.71 hectares of partially developed land, formerly in institutional use. It is defined by mature tree belts, historical buildings, and green open spaces. The landscape includes a combination of 19th- and 20th-century built form, formal avenues, a quadrangle, and parkland features. Protected Structures, including the Seminary Building, Red House, and the Archbishop's Residence, are located on or near the site.

To the south and east, the site is bounded by established residential neighbourhoods, with Clonliffe Road forming a key frontage. To the north, it is separated from the River Tolka corridor by open space and tree bands. To the west, the site adjoins Drumcondra Road Lower, screened by mature woodlands. Views from within the site are filtered by vegetation, while from outside, visibility is limited except from some elevated or nearby viewpoints, such as Grace Park Road and portions of Richmond Road. The surrounding landscape is urban in character, with institutional, recreational, and residential uses predominating.

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## 14.1.2 Impact Assessment

#### 14.1.2.1 Do-Nothing Scenario

Should the proposed development not proceed, the site would remain largely vacant, with underutilised buildings and open spaces. Given its zoning and city centre location, it is likely the site would eventually be developed in a similar form.

#### 14.1.2.2 Construction Phase

The construction phase will introduce high levels of temporary activity across the site. Impacts will result from vegetation clearance, earthworks, crane use, scaffolding, and materials stockpiling. Works will occur in phases and include the use of perimeter hoarding and access alterations. These works will be visible from surrounding areas.

The visual character of the site during this period will be one of disruption and transition, with loss of open parkland views and increased intensity of built form. While short-term, the effects on the townscape would be **significant and negative** on the Site and **moderate to significant and negative** in the immediate vicinity of the Site.

### 14.1.2.3 Operational Phase

Upon completion, the proposed development will establish a new residential neighbourhood with buildings of varying heights, extensive open spaces, and the integration of Protected Structures. The landscape will shift from institutional parkland to a more contemporary urban residential setting.

Taller buildings (up to 13 storeys) will be visible above existing vegetation from some locations, particularly from Grace Park Road and along Clonliffe Road near the entrance. However, much of the development will be screened from wider views by retained woodland, boundary walls, and existing buildings. The retained parkland setting of Red House and the quadrangle garden will help to anchor the new development within its historical context. The proposed development has the potential for significant positive effects on the landscape and visual setting in the delivery of a new appropriately located, high-quality residential neighbourhood and open spaces delivered in line with current planning policy.

During operation, there will be moderate to significant, positive, and long-term landscape effects on the Site. The impacts on the wider townscape are consistent with emerging trends in development within the city and key characteristics are not adversely altered, therefore, the effect is assessed as being moderate, neutral and long-term. Visual effects on receptors within the Site will be very significant – significant negative in the short-term becoming neutral / positive in the long-term. There will be moderate - significant effects on receptors along Clonliffe Road Corridor, but visual effects on viewpoints in other areas will be moderate at most. Effects on visual receptors will become neutral / positive in the long-term.

#### 14.1.3 Cumulative Impact

The development forms part of a broader process of urban intensification in the north inner city, with cumulative effects arising from the adjacent hotel development and other planned regeneration projects. The cumulative landscape and visual impacts will be **moderate**, **neutral**, **and long-term**,

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consistent with city centre development trends and supported by planning policy. The area's urban grain and robust landscape structure allow for this level of transformation without significant loss of townscape integrity.

### 14.1.4 Mitigation

## 14.1.4.1 Incorporated Design

The development incorporates numerous mitigation measures in its design. The layout responds to the site's historic structure, respecting key view corridors and the setting of Protected Structures. Building heights have been stepped and modulated to reflect context and sensitivity, and a significant proportion of existing trees and vegetation will be retained.

#### 14.1.4.2 Construction Phase

During construction, retained trees and woodlands will be protected in accordance with BS5837 standards. The phasing of works will reduce disruption intensity, and hoarding will be used to screen key boundaries. A project Arborist and Landscape Architect will monitor and guide protection and landscape implementation throughout.

### 14.1.4.3 Operational Phase

Operational mitigation includes high-quality public and communal open spaces and extensive new tree planting. Retained trees, supplemented by additional planting, will provide screening and character over time.

## 14.1.5 Monitoring

A project Arborist and Landscape Architect will be retained for the duration of the construction works. Monitoring of retained trees and landscape is an integral aspect of the proposed scheme. This will include supervision of tree protection, soil handling, landscape installation, and early establishment.

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# 15 Cultural Heritage - Architectural Heritage

The assessment of Cultural Heritage – Built Environment is contained within Chapter 14 of Volume II of this EIAR.

## 15.1 Existing Environment

The Project Site is largely comprised of 19<sup>th</sup> and 20<sup>th</sup> Century institutional buildings. It should be noted that several of the structures on the Site are included on the DCC Record of Protected Structures (RPS): The Main Block, Holy Cross Church, South Link Building, Ambulatory and Assembly Hall are all listed under RPS Ref. No. 1901. In the wider setting of the site, the Archbishop's House, on Drumcondra Road Lower, is listed under RPS Ref. No. 2361. The Red House is listed under RPS Ref. No. 1902. The Red House is also included on the Record of Monuments and Places, Ref. No. 018-019.

It should be noted that the NIAH Survey for the area has not yet been published.

A number of the terraced houses along Drumcondra Road Lower and Clonliffe Road adjoining the subject site are Protected Structures and / or are zoned Z2, with the objective to "protect and/or improve the amenities of residential conservation areas".

Protected Structures within the immediate context of the Site include the Archbishop's House (Reg. Ref. 2361), the Red House (Reg. Ref. 1902), the houses along Drumcondra Road (Reg. Refs. 2344 – 2368), the houses along Clonliffe Road (Reg. Refs. 1903 – 1906), the corner tower and walls of the former Goodall's Warehouse (Reg. Ref. 2291), the railway bridge at Jones's Road (Reg. Ref. 884), the former warehouse and associated buildings along Richmond Road (Reg. Ref. 7359).

The proposed Project is not within the boundaries or sightlines of any of the Key Views and Prospects identified in the Dublin City Development Plan (2022 - 2028).

## 15.2 Impact Assessment

#### 15.2.1 Demolition Phase

The demolition of some of the structures on site may result in the loss of historic features of interest.

### 15.2.2 Construction Phase

The construction of new blocks within the site and of a new extension to the rear of the Main Seminary Block will have an impact on the setting of the Protected Structures and on views within the site.

### 15.2.3 Operational Phase

The proposed development will have a visual impact on the setting of the Protected Structures on site and on the architectural heritage character of the surrounding area.

#### 15.2.4 Cumulative Impact

The cumulative visual impact of the proposed scheme and the proposed development of the adjoining site as permitted under DCC Reg. Ref. 2935/20 (currently under appeal with An Bord Pleanála, Reg. Ref. PL29N.308193) on the architectural heritage character of the wider context has been assessed under Chapter 15, Volume 2.

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## 15.3 Mitigation

A full photographic survey of the structures to be demolished has been carried out for record purposes.

Architectural features of interest and surviving historic fabric, as detailed below, will be carefully taken down and salvaged prior to the demolition works. The re-use of this fabric within the proposed Project will be considered, and any items not feasible for re-use within the Site will be salvaged off-Site. This will ensure that significant features are not lost as part of the proposed Project and that the loss of historic fabric is minimised.

Visual impact assessment has informed the design of the proposed new development so as to minimize potential visual impact of the development on Protected Structures on site, the character of their setting and the built heritage of the surrounding area.

# 15.4 Residual Impact Assessment

The residual impacts of the proposed scheme are largely neutral or positive with regard to their impact on the historic architectural character of the subject site. The Masterplan for the site was designed with careful consideration of the architectural heritage of the site and takes into account the significant views and vistas within the site.

The visual impact of the proposed development on the wider architectural heritage of the surrounding area is not considered to be significant or negative.

# 15.5 Monitoring

During the construction phase, the Developer / Contractor will ensure that a qualified conservation architect oversees the recording, disassembly, taking down, storage and salvaging of material from the Site, so as to ensure minimal damage to the historic features.

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# 16 Cultural Heritage – Archaeology

This chapter has been prepared to assess the impact, if any, on the archaeological and cultural heritage resource of a proposed development at Holy Cross College, Clonliffe Road, Dublin 3 and Drumcondra Road Lower, Drumcondra, Dublin 9. The assessment was undertaken by Faith Bailey of IAC Archaeology and includes the results of a geophysical survey carried out by Joanna Leigh (Licence Ref.: 20R0046) and a programme of archaeological testing, carried out by Neil O'Flanagan of IAC under licence 20E0286.

There are no recorded archaeological sites within the proposed development area. Seven recorded monuments are located within the 500m study area. The nearest recorded monument comprises a 17th/18th century house (DU018-019001) that is located to the immediate east of the development area. Record DU018-019002 is also associated with this site but was reclassified as a 'Redundant Record' in 2011, due to it being a replication of DU018-019001.

The geophysical survey and programme of archaeological testing failed to reveal any features of archaeological significance within the development area. Similarly, a field inspection has been carried out as part of the assessment. This confirmed that elements of the development area have been subject to development and landscaping as part of the existing Holy Cross College. Sections of the original boundary wall surrounding the walled garden associated with Clonliffe House survive, although portions have been removed recently as part of a separate development.

A review of the Excavation Bulletin (1970-2025) has shown that no previous archaeological fieldwork has been carried out with the development area, with the exception of the geophysical survey and archaeological testing completed as part of this overall assessment. Fieldwork adjacent to the site, which was carried out in 2024, recorded the remains of the original gate lodge associated with Clonliffe House, which was demolished at the time a new entrance was constructed in the later part of the 19<sup>th</sup> century, as part of the development of the college.

Whilst no sites or areas of archaeological potential were noted during the course of the geophysical survey and archaeological testing, it remains possible that small or isolated features survive beneath the current ground level and outside of the footprint of the excavated test trenches. Ground disturbances associated with the construction of the development have the potential to result in direct, negative (permanent) impacts on same. Depending on the extent and significance of any such remains, impacts (in the absence of mitigation), may range from moderate to significant.

Remaining sections of the northern and western walls of the walled garden will be removed as part of the proposed development. This will result in direct, negative (permanent) impact on same. Impacts (in the absence of mitigation) will be moderate.

Given construction requires a large number of construction activities on site, the construction phase will result in a direct, negative (short term) impact on the former demesne landscape and the setting of Red House, which is located to the immediate east. Impacts (In the absence of mitigation) will be moderate.

Red House is a recorded monument located to the immediate east of the development (RMP DU018-019001). It is also a protected structure and impacts from a built heritage perspective are addressed in Chapter 15 (section 15.4.12). The setting of the structure has been affected by development to the

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immediate east and modern car parking to the immediate west. The principal aspect of the structure (to the west) remains intact, albeit directly viewing later buildings of Holy Cross College. The operation of the proposed development will result in the removal of the car park and the establishment of a new landscaped garden to the west of the structure and mature demesne planting will be retained and supplemented. Apartment blocks to the west and south will be set back over 40m. When viewing the principal elevation of the structure from the west, the setting will remain unaffected. Whilst it is acknowledged that wider views of the structure from the north, west and south will include parts of the set-back development, the improvement of grounds to the immediate west of the structure will result in an indirect, positive (long-term) impact on the setting of the structure. Overall, the significance of effect on the setting of the recorded monument is assessed as significant.

The overall operation of the development will impact part of the original demesne landscape associated with Clonliffe House (now Red House), which the Holy Cross complex was later incorporated into. The eastern portion of the landscape has been subject to development and many of the designed elements have been lost. The surviving aspects of the landscape include mature planting and the route of the access drive to Red House. The development will have a direct, negative (long term) impact on the landscape, but the retention of the surviving demesne features and the condition of the landscape means but the significance (In the absence of mitigation) will be slight.

All topsoil stripping associated with the proposed development will be subject to archaeological monitoring. During archaeological monitoring the remains of the walled garden will be exposed and subject to a full record, including measured and photographic survey. The foundations of the wall will also be investigated and recorded. These works will be carried out under licence to the National Monuments Service of the DoHLGH and in consultation with the DCC Archaeologist. If any archaeological remains are discovered during the course of works further mitigation will be required, such as preservation in situ or by record (excavation). Any further mitigation will require approval from the National Monuments Service and the DCC Archaeologist.

Prior to the commencement of construction, a full photographic survey will be conducted within the former demesne landscape, including a detailed record of all boundaries and designed landscape elements. The survey will include records from ground floor and aerial views. The survey will be carried out by a suitably qualified professional with expertise in designed landscapes.

The landscape survey that is detailed above and will commence prior to construction, will include Red House and its setting, in order to create a detailed record of same. In addition, all mature trees within the current setting of the building and demesne will be retained where possible and additional trees planted in order to enhance the existing planting and maintain an overall 'parkland' character.

No cumulative impacts have been identified on the archaeological and cultural heritage resource during the course of this assessment.

Following the implementation of mitigation at construction stage, no significant residual impacts are predicted upon the buried archaeological resource and the remains of the walled garden, as any features that may be present will be identified and preserved by record.

A detailed survey and record will be made of the former demesne landscape prior to the commencement of construction and operation. This will reduce the overall construction and operation impact on the overall landscape from slight to not significant.

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# 17 Microclimate - Daylight & Sunlight

The Holy Cross College LRD ('proposed Project' hereafter) at the former Holy Cross College, Clonliffe Road, Dublin 3 and Drumcondra Road Lower, Drumcondra, Dublin 9, has been considered for its impact on daylight availability on the surrounding environment, including residential buildings and amenity spaces. The reader should note that a separate, standalone Daylight Assessment report, prepared by ARUP in respect of the proposed Project, has been submitted with this application, under separate cover. Full results, graphics and tables are available in this report if the reader wishes to find more detailed information beyond that given within this Chapter.

A daylight availability assessment was undertaken to investigate the effects of the proposed development at Holy Cross Lands on the existing surrounding environment. The assessment was carried out in line with local and national policy, along with various standards and recommendation documents.

Effects to existing properties are benchmarked and classified against methods described in best practice. The scale of effects is given below.

- Negligible
- Minor Adverse
- Moderate Adverse
- Major Adverse
- Beneficial

The results found are summarised below:

- A minor adverse effect is experienced at No 15 Corn Mill Rows, No 1 College Mews, No's 133 137 Drumcondra Road Lower and No 182 Clonliffe Road.
- All other surrounding properties will experience negligible effects.

Mitigation measures have been incorporated as the design progressed. No further mitigation measures are proposed. As no further mitigation measures are expected or proposed, the residual impacts are in line with the predicted impact described above.

All relevant adjacent permissions have been included within the assessment of the impact of the proposed Project on the surrounding environment. As such, the cumulative impacts can be described as being the same as the impact of the proposed Project, as assessed above.

The key interaction between this chapter and other specialist chapters of the EIAR is with Chapter 7 (Population & Human Health), since impacts in relation to daylight and sunlight availability, e.g. overshadowing of neighbouring buildings, can negatively or positively affect residential amenity in the receiving environment. When considering the impact of the proposed project on the daylight and sunlight availability in the existing surrounding environment, it can be stated that the proposed development has a negligible impact on the majority of the surrounding dwellings. No significant effects are predicted during either the construction or operational phase.

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# 18 Microclimate – Wind

An appraisal of the likely impact of the mixed-used development at the former Holy Cross College, Clonliffe Road, Dublin, on the wind conditions affecting activities in areas within and surrounding the development was undertaken. The presence of taller buildings among lower buildings provides the potential for windiness in surrounding areas. The windiness depends on both the massing of the buildings within their surroundings, their orientation with respect to the wind, and the local climate.

The criteria used to describe windiness in this study are those of T.V. Lawson of Bristol University which describe acceptability for particular activities in terms of 'comfort' and 'distress' (or safety). The onset of discomfort depends on the activity of the individual; 'sitting', 'standing', 'strolling' or 'business walking'. The Lawson Comfort Criteria incorporates a probabilistic analysis to ensure the effects in question relate to a given frequency to occur. The definition of the Lawson comfort criteria is based on a 5% probability of wind speeds to exceed specific thresholds on a yearly basis. The significance of such effects on the wind comfort conditions is evaluated based on the magnitude of exceedance of these thresholds.

There is also a distress criterion that relate to a frequency of occurrence that is rare (less often than once a year). The Lawson Distress Criteria enable an assessment of the potential for the proposed development to cause risks to human health as a result of higher than desirable wind speeds using a threshold for 'General Public Access', equivalent to a mean speed of 15 m/s (gust speed of 28 m/s) and a threshold for less able individuals or cyclists, equivalent to a mean speed of 20 m/s (gust speed of 37 m/s). The significance of the effects of the proposed development on the distress wind conditions at any particular location is evaluated based on the estimated number of hours when occupants and visitor may experience wind conditions in exceedance of the distress criteria. Where wind speeds exceed these values, pedestrian access should be limited, and some types of vehicles may also be vulnerable to resulting crosswinds.

### 18.1.1 Summary Receiving Environment

Met Éireann's meteorological station at Dublin Airport is the closest meteorological station to Dublin and to the site. The expected statistics for wind strength and direction are based on historic wind data recorded over a 25-year period, between 1999 and 2024, at this weather station. The most common and strongest winds in Dublin come from the southwest and west. These are relatively warm and often bring rain. The winds from the east are not as common as the westerlies, however, they are relatively cold, which can make them as annoying as the stronger westerlies.

The existing site consists of the lands at the former Holy Cross College, on Clonliffe Road (Dublin 3) and Drumcondra Road (Dublin 9). At present, the site is bounded by Clonliffe Road to the south, Drumcondra Road to the west, the River Tolka to the north, and Belvedere Sport Pitches to the east. In the future, the site will be bounded to the north by GAA pitches. The existing site is an open area covered with the buildings of the former Holy Cross College (up to 4 storeys) and other low-rise buildings, mature vegetation and trees. The site is primarily surrounded by low-rise residential developments, except for the Belvedere Sport Pitches to the north-east and the Croke Park Stadium to the south-east. The receiving environment includes the hotel currently under construction to the south of the site.

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## 18.1.2 Potential Impacts of the Proposed Development

In general, the proposed development is expected to provide a suitable environment for pedestrians and occupants to carry out a wide variety of 'sitting', 'standing' and 'walking' activities. Wind mitigations have been integrated in the design to reduce windiness on balconies and roof gardens. These include 1.1 m solid balustrades at some of the residential balconies in Blocks A1, C1.b and C2, 1.1 m solid side screens in Block D2, and a 1.8 m tall solid balustrade along the usable area of the roof gardens of Plot A.

However, it is anticipated that pedestrians may experience higher wind speeds that are less than comfortable at certain locations within and in the immediate vicinity of the site. It is predicted that these higher speeds could occur due to one or a combination of the following phenomena:

- exposure
- high speed wind around corners
- funnelling between blocks and in passages through buildings
- downdraft

Higher speed winds are likely to occur at the following locations in publicly accessible areas:

- along the thoroughfares at the south-east corners of Blocks A2 and A3, to the east of Block B3 and to the east of Block C2.
- in the open space to the south of Block A4.
- on the eastern roof garden of Block A4.
- at the entrance of Block B3 that is located on the southern side of the central passage though the block.

## 18.1.3 Avoidance, Remedial and Mitigation Measures

Mitigation measures to reduce excessive windiness have been developed through the design process and embedded in the building design. These include the use of solid balustrades or side screens in balconies that were exposed to excessive windiness. The existing and proposed mature landscaping is expected to further mitigate the wind effects in and around the proposed development, especially during the spring and summer seasons when trees are in full foliage.

## 18.1.4 Predicted Impacts of the Proposed Development

In general, the proposed development is expected to provide a suitable environment for pedestrians and occupants to carry out a wide variety of 'sitting', 'standing' and 'walking' activities. Wind mitigations have been adopted at the design stage where less than desirable windiness is expected within the development, and further relief from windiness is provided by the existing and proposed landscaping when trees are in full foliage.

The predicted impact of the proposed development including mitigation measures and landscaping is as follows:

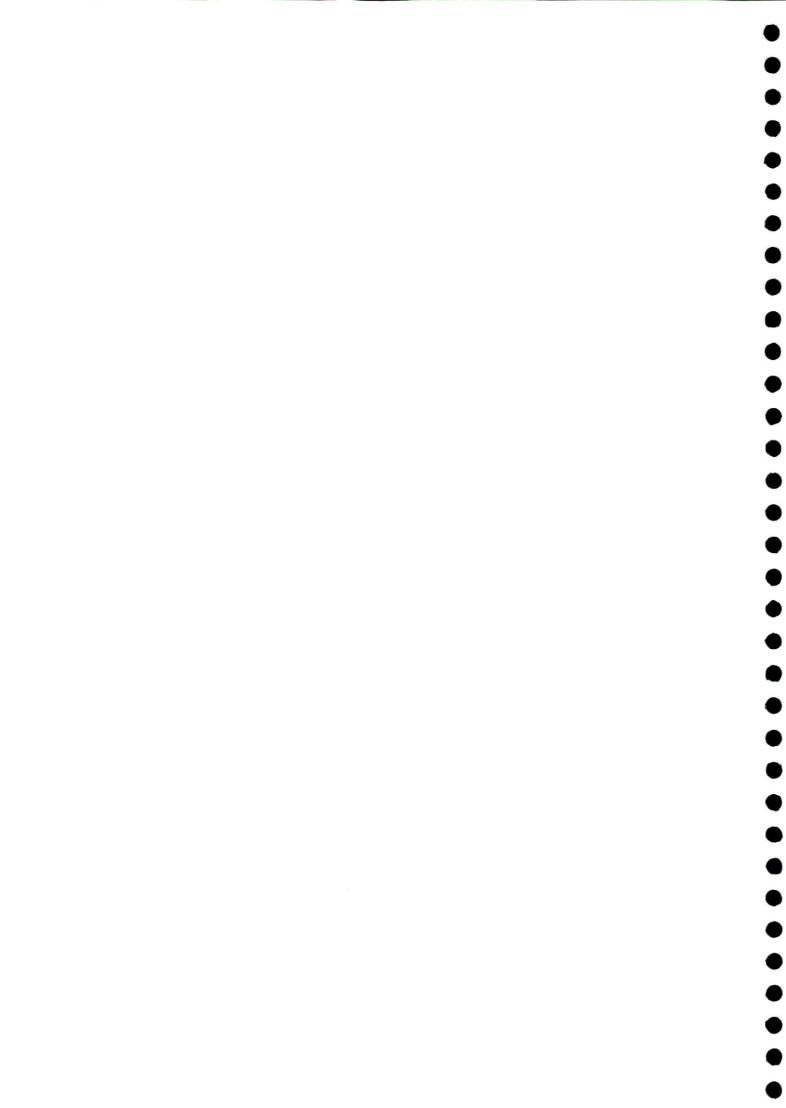
- The wind conditions estimated at the thoroughfares in and around the development are suitable for their intended use.
- Most of the public seating spaces are expected to experience wind conditions within the 'sitting' to 'standing' range. These conditions are considered 'comfortable' for standing and short-term

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- seating, like bench seating use. There is an expectation to use these spaces in good weather conditions, which would improve on the acceptability of the estimated windiness
- The wind conditions predicted at the entrances of the proposed development are suitable for the intended use.
- The wind conditions estimated at most of the private balconies in the residential buildings are in the 'sitting' to 'standing' range. The conditions are reasonable for the intended use as private outdoor spaces. On some of the balconies people may experience wind conditions that are above the distress threshold for up to 10 hours per year due to the interaction with the prevailing winds. Occupants are expected to avoid using their balconies during inclement weather, when the distress wind conditions are most likely to occur.
- The wind conditions estimated at the roof gardens of Plot A are mostly up to the 'standing' range and reasonable for their intended use. These spaces are considered shared private spaces for occupants and visitors and there is an expectation that they will be mostly used during good weather conditions.

No likely significant negative effects are predicted in relation to the wind microclimate during the operational phase of the proposed development with the proposed mitigations and landscaping plan.

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# 19 Traffic & Transportation

### 19.1 Introduction

This chapter of the EIAR has been prepared to assess the potential impact of the proposed project in terms of traffic and transportation. This chapter provides an overview of the existing receiving environment, a detailed and robust assessment of the potential impact of the proposed project on the operation of the local road network, both during the short-term construction phase and long-term operational phase, and outlines mitigation measures to ensure any significant effects are minimised or avoided.

## 19.2 Existing Environment

The site is located to the east of the R132 Drumcondra Road Lower and north of the R131 Clonliffe Road. The two key signalised junctions in the area are:

- R132 Drumcondra Road Lower / R131 Clonliffe Road; and
- R131 Clonliffe Road / Jones's Road.

The former main entrance to Holycross College is located opposite Jones's Road on Clonliffe Road, and there are gated accesses into the site from Drumcondra Road and Holycross Avenue, both of which are currently unused.

The site is very well connected by public transport with a wide array of both bus and rail services located nearby. The R132 Drumcondra Road Lower corridor is one of the core bus corridors into Dublin, with a high frequency of services running from North Fingal, Swords, Dublin Airport and Ballymun into the city. Even in off peak periods, there is typically no more than a five-minute wait for a bus to the City Centre.

Drumcondra Railway Station is a five-minute walk from the development, and is served by services running between the City Centre and Maynooth.

## 19.3 Proposed Development

The main features of the site design from a transport perspective are summarised below:

- Vehicle, cycle and pedestrian access into the site will be taken at the Clonliffe Rd Jones' Road signalised junction, where a fourth signalised arm will be added to serve the development. The signalised junction has been approved as part of the consented hotel application. This upgraded junction will provide vehicular access to Blocks B, C, D and E, the potential future GAA development, along with the permitted hotel on Clonliffe Road.
- A second vehicle, cycle and pedestrian access point will be taken onto Drumcondra Road opposite the Drumcondra Rd / Access / Hollybank Rd priority junction. This 'left-in, left-out' priority junction will provide vehicular access to Block A, and the creche and retail units in this area.
- It will not be possible for private vehicles to travel through the site as a barrier will prevent through travel. Refuse and emergency vehicles will be able to pass through the barrier as required.
- An additional cyclist and pedestrian access is proposed through an existing access point on Holy Cross Avenue.

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- The site will provide a range of walking and cycling routes, that will be safe and attractive, and provide permeability throughout the development, linking destinations inside and outside of the site.
- Two 'Mobility Hubs' will be provided within the site. It is intended that these will form a focus for Car Club, bike and scooter hire (including cargo bikes), and feature bike maintenance / washing stations, and parcel collection lockers.
- The site will initially provide space for eight Car Club vehicles, which will be available to residents as well as the general public.

## 19.4 Impact Assessment

### 19.4.1 Construction Phase

It is anticipated that the development will be constructed in four stages: 1a, 1b, 2 and 3. Access to the Phase 1 construction site would be via the Clonliffe Road, all movements, access junction. Access for Phases 2 and 3 would be from the left in – left-out access junction on Drumcondra Road Lower.

The full site would be constructed over a period of 60 months. During the peak construction period in 2028, when Phases 1a, 1b and 2 are active on site at the same time, it is anticipated that there will be a daily average of:

- 68 inbound HGV trips; and
- 51 inbound car / van trips.

Working hours will be determined and conditioned by the Grant of Permission. It is envisaged that these will be 07:00 - 19:00 Monday to Friday and 08:00 - 14:00 on Saturday.

This will mean that the majority of workers will have arrived on site before the 'traditional' morning peak hour. Construction workers will typically depart the site from 16:00 onwards. HGVs will arrive and depart from the site at regular intervals throughout the day.

The predicted increase in HGVs on R131 Clonliffe Road between the R132 and the site access junction during the construction stage is 46%. In terms of an absolute increase, this equates to 96 two-way HGV trips per day, around 6 inbound HGVs per hour, or one every 10 minutes.

The overall effect during the Construction Stage is assessed to be **negative**, **likely and short-term**, **and of Slight to Moderate significance**, and therefore **Not Significant** in accordance with the EIA Directive.

A Construction Management Plan accompanies the planning application. This (amongst other things) sets out the principles by which construction traffic will be planned for, managed, and monitored, to ensure that any impacts on local communities, vulnerable users and road users, will be minimised as far as possible.

### 19.4.1.1 Operational Phase

The predicted percentage increase in traffic as a result of the development, in all scenarios, ranges between 1% and 4%, except for the section of Clonliffe Road between R132 Drumcondra Road Lower and Jones' Road. On this link, the predicted impact is 9.3% in 2034, and 8.9% in 2044.

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None of the increases during the Operational Phase of the development are predicted to exceed 10% therefore, in accordance with the IEAM Guidelines, a detailed assessment is not required.

The Transport Assessment that accompanies the planning application includes junction capacity assessments of the following junctions, which demonstrates that no capacity issues are predicted as a result of the development:

- Drumcondra Road Lower / Hollybank Road priority junction;
- Drumcondra Road Lower / Clonliffe Road signalised junction; and
- Clonliffe Road / Jones's Road signalised junction.

The overall effect during the Operational Stage is assessed to be **negative**, **likely and long-term**, **and of Slight significance**, and therefore **Not Significant** in accordance with the EIA Directive.

### 19.4.1.2 Cumulative Impact

The cumulative assessment takes into account traffic from other consented developments (or those awaiting a decision) within the study area, in addition to the traffic generated by the proposed scheme.

Potential significant cumulative effects were identified with both the Swords Core Bus Corridor (CBC) and the Metrolink Project. The construction period of both of these schemes could occur at the same time as the Clonliffe LRD scheme is being constructed.

The overall cumulative effect during the construction stage is assessed as **negative**, **likely and short-term**, **and of slight to moderate** significance, and therefore **Not Significant** in accordance with the EIA Directive.

The overall cumulative effect during the operational stage, is assessed as **positive**, **likely and long-term**, and of **moderate** significance, and therefore **Not Significant** in accordance with the EIA Directive. This effect is deemed to be positive due to the greatly enhanced public transport provision that will be provided by the CBC and Metrolink projects.

## 19.5 Mitigation

Traffic impacts during the **construction stage** will be mitigated through the implementation of a Construction Management Plan (CMP) and Construction Environmental Management Plan (CEMP), which will be agreed with DCC. These documents, (amongst other things) sets out the principles by which construction traffic will be planned for, managed, and monitored, to ensure that any impacts on local communities, vulnerable users and road users, will be minimised as far as possible.

Traffic impacts during the **operational stage** will be reduced through the implementation the Mobility Management Plan, which is a 'best practice' measure, that accompanies the planning application. This sets out measures to minimise the amount of vehicle trips generated by the development, and to support sustainable travel.

Cumulative effects will be mitigated through coordination with other major schemes in the area, which will aim to avoid peak works on both sites occurring at the same time. For example, the Metrolink EIAR proposes the establishment of a Project Construction Traffic Forum- with representatives from key stakeholders.

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## 19.6 Residual Effects and Conclusion

The overall residual effect during the Construction Stage is assessed to be **negative**, **likely and short-term**, **and of Slight significance**, and therefore **Not Significant** in accordance with the EIA Directive.

The overall residual effect during the Operational Stage is assessed to be **negative**, **likely and long-term**, **and of slight significance**, and therefore **Not Significant** in accordance with the EIA Directive.

The overall cumulative effect during the construction stage is assessed as **negative**, **likely and short-term**, **and of slight to moderate** significance, and therefore **Not Significant** in accordance with the EIA Directive.

The overall cumulative effect during the operational stage, is assessed as **positive**, **likely and long-term**, and of **moderate** significance, and therefore **Not Significant** in accordance with the EIA Directive. This effect is deemed to be positive due to the greatly enhanced public transport provision that will be provided by the CBC and Metrolink projects.

No significant residual impacts have therefore been identified during the construction or operational phases, or as a result of the cumulative effects of the development with other proposals.

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## 20 Material Assets – Waste

## 20.1 Introduction

AWN Consulting undertook the waste management assessment. The receiving environment is largely defined by Dublin City Council (DCC) as the local authority responsible for setting and administering waste management activities in the area through regional and development zone specific policies and regulations.

There will be waste materials generated from site clearance works (demolition), excavations, construction of the new development and from the operation of the new development.

# 20.2 Potential Impacts and Mitigation Measures of the Proposed Development

#### 20.2.1 Construction Phase

During the construction phase the mismanagement of waste, including the inadequate storage of waste, inadequate handling of hazardous waste, the use of inappropriate or insufficient segregation techniques, and the use of non-permitted waste contractors, would likely lead to negative impacts such as waste unnecessarily being diverted to landfill, litter pollution which may lead to vermin, runoff pollution from waste, fly tipping and illegal dumping of waste. In the absence of mitigation, the effect on the local and regional environment is likely to be **long-term**, **significant** and **negative**.

#### 20.2.2 Operational Phase

The potential impacts on the environment during the operational phase of the proposed development would be caused by improper, or lack of waste management. In the absence of mitigation, the effect on the local and regional environment is likely to be **long-term**, **significant** and **negative**.

## 20.3 Residual Effect of the Proposed Development

### 20.3.1 Construction Phase

During the construction phase, typical construction waste materials will be generated which will be source segregated on-site into appropriate skips/containers, within designated waste storage areas and removed from site by suitably permitted waste contractors as required, to authorised waste facilities, by appropriately licensed waste contractors. While the accurate keeping of waste records will be undertaken. All waste leaving the site will be recorded and copies of relevant documentation maintained.

This will all be overseen by the main contractor, who will appoint a construction phase Resource Manager to ensure effective management of waste during the excavation and construction works. All construction staff will be provided with training regarding the waste management procedures on site.

A carefully planned approach to waste management and adherence to the site-specific Resource and Waste Management Plan (**Appendix 20.1**) and Chapter 20 during the construction phase, this will ensure that the effect on the environment will be **short-term**, **neutral and imperceptible**.

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### 20.3.2 Operational Phase

During the operational phase, waste will be generated by the commercial tenants and residents. Dedicated waste storage areas (WSA) have been allocated for the development for use by the tenants and residents. The WSAs have been appropriately sized to accommodate the estimated waste arisings from the development. The WSA has been allocated to ensure a convenient and efficient management strategy with source segregation a priority. Waste will be collected from staging/collections points, adjacent to the curtilage, by permitted waste contractors and removed off-site for re-use, recycling, recovery and/or disposal.

An Operational Waste Management Plan has been prepared and included as part of this submission as **Appendix 20.2**. This OWMP provides a strategy for segregation (at source), storage and collection of wastes generated within the development during the operational phase including dry mixed recyclables, organic waste, glass, mixed non-recyclables, garden/green waste, batteries, waste electrical equipment, printer cartridges, chemicals, lightbulbs, textiles, cooking oil, furniture and abandoned bicycles.

Provided the mitigation measures outlined in Chapter 20 are implemented and a high rate of reuse, recycling and recovery is achieved, the predicted effect of the operational phase on the environment will be **long-term**, **neutral** and **imperceptible**.

## 20.4 Cumulative Impact of the Proposed Development

#### 20.4.1 Construction Phase

There are existing residential and commercial developments close by, along with the multiple permissions remaining in place in the area. In a worst-case scenario, multiple developments in the area could be developed concurrently or overlap in the construction phase. Due to the high number of waste contractors in the DCC region, as provided from the National Waste Collection Permit Office and the EPA, there would be sufficient contractors available to handle waste generated from a large number of these sites simultaneously, if required. Similar waste materials would be generated by all of the developments.

Other developments in the area will be required to manage waste in compliance with national and local legislation, policies and plans which will mitigate against any potential cumulative effects associated with waste generation and waste management. As such the cumulative effect will be **short-term**, **imperceptible** and **neutral**.

## 20.4.2 Operational Phase

There are existing residential and commercial developments close by, along with the multiple permissions remaining in place. All of the current and potential developments will generate similar waste types during their operational phases. Authorised waste contractors will be required to collect waste materials segregated, at a minimum, into recyclables, organic waste and non-recyclables. An increased density of development in the area is likely improve the efficiencies of waste collections in the area.

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Other developments in the area will be required to manage waste in compliance with national and local legislation, policies and plans which will mitigate any potential cumulative impacts associated with waste generation and waste management. As such the cumulative effect will be a **long-term**, **imperceptible** and **neutral**.

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## 21 Material Assets – Services

This chapter of the Environmental Impact Assessment Report was prepared by Brady Shipman Martin and assesses the potential impacts of the proposed development on built services and infrastructure not otherwise addressed under the scope of the foregoing chapters, i.e. surface water drainage, foul water drainage, water supply and utilities (electricity, gas and telecommunications) infrastructure.

The potential impacts in relation to material assets were assessed through a desktop study of available information (including plans and maps from Uisce Éireann, ESB, Gas Networks Ireland, Eir and Virgin Media) and review of design documents for the proposed development. The assessment methodology is consistent with relevant guidelines from the Environmental Protection Agency and National Roads Authority.

The site is located within the grounds of the former Holy Cross College seminary. These lands were acquired by the Archdiocese in 1859 and college facilities were developed. They housed a seminary for the Catholic Church in Ireland and administration offices for the Archdiocese and various diocesan activities. The seminary ceased operation in 2000. Thereafter, the site was predominantly used for offices and activities of the Archdiocese and charitable organisations, which occupied relatively little space in the large site, and they have now vacated the site. The land and buildings on the site are significantly underutilised at present.

The Archdiocese entered into an agreement with Cumann Lúthchleas Gael / the Gaelic Athletic Association (GAA) to acquire these lands and who subsequently entered into an agreement to onward sell these to the applicant CWTC Multi Family ICAV acting solely on behalf of its sub-fund the DBTR DR1 Fund. The Archdiocese retains the Archbishop's residence and surrounding lands, and lands in the south-west corner of the Holy Cross College property, which includes the former Mater Dei building, a Family Hub, and a large surface car park. These lands are included in the wider Masterplan.

The Red House (Dublin City Council Registered Protected Structure Reference Number 1902 and Recorded Monument Ref. No. 018-019) and curtilage is owned by Páirc an Chrócaigh Teoranta Cuideachta Faoi Theorainn Ráthaíochta / GAA as well as the land at the south-eastern corner of the Holy Cross College lands which has been subject to an approval by An Bord Pleanála for a 2 to 7 storey 200 room hotel. The land parcel to the north of the Holy Cross College lands, former grass playing pitches, are operated by the GAA and are due to be formally acquired by the GAA from the Archdiocese of Dublin. The Red House and its curtilage are owned by the GAA and does not form part of the proposed development, other than in respect of proposed adjacent landscaping. The setting and curtilage of the Red House need to be preserved in line with its protected structure status.

Existing built services and infrastructure at the site of the proposed development may be summarised as follows:

Surface Water Drainage: The existing drainage systems on the site are mainly combined systems (carrying foul and surface water). There are connections from the site to the existing sewerage network on Clonliffe Road and also to the 675mm diameter combined sewer, which traverses the north-east quadrant of the masterplan lands. There is an existing 225mm combined sewer on Holy Cross Avenue which discharges in a southerly direction and connects to the 375mm diameter combined sewer on Clonliffe Road. This 375mm sewer on Clonliffe Road discharges in an easterly

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direction and connects into a 450mm diameter combined sewer downstream. There also is a 675mm diameter combined sewer in the north-east quadrant of the masterplan lands, crossing the lower lying grassed area in a south easterly direction. The existing sewerage network in the vicinity of the site eventually discharges to the Poplar Row pumping station (to the east) and from there sewage is pumped to the municipal wastewater treatment at Ringsend;

- Foul water Drainage: There is an existing 375mm foul network sewer on Clonliffe Road. There is an existing 675mm foul network sewer which crosses the site at the northern corner heading in a south-western direction;
- Water Supply: There are numerous Uisce Éireann watermains in the vicinity of the site including, a 100mm, 150mm and 800mm diameter watermains, to the south of the proposed development, on Clonliffe Road, a 150mm watermain on Holy Cross Avenue, to the south-west of the proposed development and a 600mm and a 225mm watermain on Drumcondra Road Lower, to the north-west of the proposed development. In addition, there is a network of existing on-site watermains serving the various existing buildings across the Holy Cross lands;
- Electricity: The existing buildings on the Site are served by MV / LV underground cables, fed from both the Drumcondra Road and Clonliffe Road. There are also higher voltage (38 KV) cables under Clonliffe Road, where works are proposed;
- Gas: The existing gas infrastructure is comprised of low-pressure service pipes and abandoned pipes. The existing live feed enters the proposed development via Drumcondra Road Lower and passes alongside the Archbishop's House and under the gates to the rear of the Palace.
- Telecommunications: The site is fed telecommunications infrastructure from Drumcondra Road via the Archbishop's House. There is existing broadband infrastructure in the vicinity, as provided by Virgin Media. There is currently no broadband connectivity at the Site

In order to facilitate the proposed development, new built services and infrastructure will need to be put in place at the site, tying in with existing infrastructure in the receiving environment.

On-site utilities works and diversions, if improperly executed, have the potential to result in:

- Damage to material assets;
- Interruptions to supply / services in neighbouring areas; and / or
- Human health impacts related to accidents (e.g. involving live power cables or gas mains).

However, all utilities works will be carried out in accordance with the relevant standards and codes of the respective service providers and authorities (i.e. Uisce Éireann, ESB, GNI, Eir, Virgin Media, Health and Safety Authority (HSA) and any others of relevance). Such works will be carried out in a strictly controlled manner that is safe, and which avoids or minimises interruptions of service that might affect local residents, businesses and adjacent development. In the absence of mitigation measures **negative**, **slight and short-term impacts** are predicted in relation to built services or infrastructure during the construction phase.

During the operational phase, the site will contain operational surface water drainage, foul water drainage, water supply, electrical, gas and telecommunications systems, serving the proposed residential units. These systems are being designed and specified in accordance with the applicable codes and standards of the respective service providers and authorities (i.e. Uisce Éireann, ESB, GNI and Eir / Virgin Media), and will be sufficient to provide for the operational demands of the proposed

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development. Demand from the proposed development is not predicted to negatively affect the existing networks in the receiving environment. Maintenance of built services and infrastructure on the site will be carried out on an ongoing basis during the operational phase, as per the relevant requirements of the respective service providers and authorities. **No likely significant impacts** are predicted in relation to built services or infrastructure during the operational phase.

A number of mitigation measures have been proposed in order to ensure that adverse impacts are avoided / minimised insofar as practicable.

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## 22 Interactions

This chapter of the Environmental Impact Assessment Report provides an overview of the key interactions identified and addressed in the foregoing chapters of the report.

It is a requirement of the EIA Directive that, not only are the impacts in respect of the individual specialist topics (hydrology, biodiversity, air quality and climate, etc.) to be addressed in the Environmental Impact Assessment Report, but so too must the interactions and inter-relationships between these topics be addressed. As stated in the Environmental Protection Agency's 2022 *Guidelines on the information to be contained in Environmental Impact Assessment Reports*:

"The interactions between effects on different environmental factors should be addressed as relevant throughout the EIAR. For example, where it is established in the Hydrology section that there will be an increase in suspended solids in discharged surface waters during construction, then the Biodiversity section should assess the effect of that on sensitive aquatic receptors. [...] It is general practice to include a matrix to show where interactions between effects on different factors have been addressed. [...] This is typically accompanied by text describing the interactions." (Section 3, p. 56).

A matrix of interactions is provided in **Table 22.1**, below, summarising where effects / impacts in relation to one topic (the source) have been found to directly or indirectly result in effects / impacts in relation to another topic (the receptor).

The relevant consultants have liaised with each other and members of the design team, where necessary, to address potential impacts arising as result of interactions between one or more environmental topics or media. Where necessary, corresponding mitigation measures have been prescribed.

Table 22.1 Interactions matrix

RECEPTOR	POPULATION & HUMAN HEALTH	BIODIVERSITY	LAND, SOILS, GEOLOGY & HYDROGEOLOGY	Hydrology	AIR QUALITY	CLIMATE	NOISE & VIBRATION	LANDSCAPE & VISUAL	CULTURAL HERITAGE & ARCHAEOLOGY	ARCHITECTURAL HERITAGE	MICROCLIMATE – DAYLIGHT & SUNLIGHT	MICROCLIMATE - WIND	TRAFFIC & TRANSPORTATION	MATERIAL ASSETS - WASTE	MATERIAL ASSETS - SERVICES
Population & Human Health					1		1	1			<b>✓</b>	<b>√</b>	1	<b>✓</b>	1
BIODIVERSITY			<b>✓</b>	<b>✓</b>	<b>✓</b>			<b>✓</b>							
LAND, SOILS, GEOLOGY & HYDROGEOLOGY		1		<b>✓</b>	1				<b>/</b>	<b>✓</b>			1	<b>✓</b>	
Hydrology		1	1			1									
Air Quality	1	1	1			1							1		
CLIMATE			1		<b>✓</b>							<b>✓</b>	1	<b>✓</b>	
Noise & Vibration	<b>/</b>												1		
LANDSCAPE & VISUAL	1	1								<b>✓</b>					
CULTURAL HERITAGE & ARCHAEOLOGY								<b>/</b>		<b>✓</b>					
ARCHITECTURAL HERITAGE								1	1						
MICROCLIMATE - DAYLIGHT & SUNLIGHT	1														
MICROCLIMATE - WIND	1														
Traffic & Transportation	1		<b>/</b>		<b>√</b>	<b>✓</b>	1							<b>✓</b>	
MATERIAL ASSETS — WASTE	/	1	1										1		

RECEPTOR	POPULATION & HUMAN HEALTH	BIODIVERSITY	LAND, SOILS, GEOLOGY & HYDROGEOLOGY	HYDROLOGY	AIR QUALITY	QUIMATE	Noise & Vibration	LANDSCAPE & VISUAL	CULTURAL HERITAGE & ARCHAEOLOGY	Architectural. Heritage	MICROCLIMATE – DAYLIGHT & SUNLIGHT	MICROCLIMATE - WIND	TRAFFIC & TRANSPORTATION	MATERIAL ASSETS - WASTE	MATERIAL ASSETS - SERVICES
MATERIAL ASSETS - SERVICES	<b>\</b>													<b>✓</b>	



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# 23 Cumulative Impacts

This chapter of the EIAR discusses the potential for cumulative impacts to arise as a result of the proposed development in combination with other projects.

Annex III (3)(g) of the EIA Directive requires the EIAR to include the potential for significant cumulative effects of projects on the environment and it states to include "the cumulation of the impact with the impact of other existing and/or approved projects." Annex IV (5)(e) of the EIA Directive states that EIAR should include "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."

The European Commission Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions (1999) define cumulative impacts as "Impacts that result from incremental changes caused by other past, present or reasonably foreseeable actions together with the project" (p. iii).

Similarly, the EPA guidelines define cumulative effects as "The addition of many minor or insignificant effects, including effects of other projects, to create larger, more significant effects" (Section 3, p. 52). The EPA guidelines further state that:

"While a single activity may itself result in a minor impact, it may, when combined with other impacts (minor or insignificant), result in a cumulative impact that is collectively significant. For example, effects on traffic due to an individual industrial project may be acceptable; however, it may be necessary to assess the cumulative effects taking account of traffic generated by other permitted or planned projects. It can also be prudent to have regard to the likely future environmental loadings arising from the development of zoned lands in the immediate environs of the proposed project." (Section 3, p. 54)

## 23.1 Assessment of Cumulative Impacts

Cumulative impacts have been assessed by taking account of the baseline environment and the predicted impacts of the construction and operation of the proposed development in combination with those of other existing and / or permitted projects in the zone of influence relevant to individual environmental factors.

Therefore, each of the specialist contributors to this EIAR have considered the potential for cumulative impacts to arise, with particular reference to the projects listed in this Chapter.

This EIAR has considered three categories of potential cumulative plans / projects for the proposed development based on the following:

- Existing or commenced projects with a valid planning permission within the vicinity of the proposed development that have the potential for significant cumulative effects with the proposed development;
- Approved projects with a valid planning permission that have not commenced construction but with the potential for significant cumulative effects with the proposed development; and
- Proposed projects that do not have planning permission but have the potential for significant cumulative effects with the proposed development.

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## 23.2 Key Plans & Developments

A search for other developments that may have the potential to result in cumulative impacts with the proposed development was carried out, and a list of key developments for consideration was developed (**Table 23.1**). In identifying these developments, the following principal sources were consulted (as of July 2025):

- Dublin City Council planning portal;
- Dublin City Council weekly lists of applications received;
- An Bord Pleanála (ABP) website;
- Department of Housing, Local Government and Heritage EIA Portal;
- Dublin City Development Plan 2022-2028.

As detailed in Chapter 3 (Planning & Development Context) the proposed development lies within the DCC administrative area. Therefore, the site is subject to the land use policies and objectives of the Development Plan, which has zoned the lands in question as Z12, 'Institutional Land (Future Development Potential)' which has the stated aim 'to ensure existing environmental amenities are protected in the predominantly residential future use of these lands'. As such, the use of the lands as proposed in this LRD application is in accordance with the zoning and envisaged future development for the lands, as set out in the Development Plan.

As required under Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and the Habitats Directive, a Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) have been completed in respect of the Development Plan, respectively.

**Table 23.1** provides a list of relevant permitted and proposed developments in the vicinity of the site, which have been given due consideration in the assessment of potential cumulative impacts. **Figure 23.1** maps these developments in relation to the proposed development site.

It is noted that the list of developments in this Chapter is non-exhaustive. There are a wide variety of other applications and permissions in the area. However, minor developments, such as one-off housing, erection of signage and other minor structures and extensions, have been excluded due to the absence of potential for significant cumulative impacts. Lapsed and refused permissions have also been excluded.

The lands to the immediate north of the site are owned by the GAA. The GAA is considering proposals to provide playing pitches, an associated clubhouse and car parking on these lands. As part of the masterplan prepared for the overall lands, the layout of the proposed development has taken account of these potential proposals and facilitates such a future development by the GAA. Any such development would be subject to separate planning application and assessment. Given the amenity, recreation nature of any such development it is not anticipated that it would give rise to significant negative environmental impacts.

#### 23.3 Conclusion

For topic-specific assessments of the potential for cumulative impacts, please refer to the specialist EIAR chapters (Volume 2). Assuming the full and proper implementation of the mitigation measures set

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out in this EIAR, it has been assessed within those specialist chapters that no significant negative cumulative impacts are likely to arise during the construction or operational phases of the proposed development.

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Table 23.1 Permitted and proposed developments to which regard has been had in the assessment of potential cumulative impacts

Ref.	Applicant	Location	Description - overview	Status	Environmental Assessments
Permitted Develo	pments / Unde	er Construction			
DCC 2935/20 ABP 308193	Páirc An Chrócaigh	Lands off Clonliffe Road (formerly part of the Holy Cross College Lands), Clonliffe Road, Drumcondra, Dublin 3	Permission for a hotel development on Lands off Clonliffe Road comprising of 7 storeys and the demolition of the existing boundary wall, repositioning of the gate piers and widening of the entrance on Clonliffe Road to facilitate two-way traffic, the creation of 2 no. pedestrian accesses off Clonliffe Road, and the construction of a replacement plinth boundary wall with railings along Clonliffe Road, landscaping, boundary treatments, street lighting, SuDS drainage, piped and other services.	Permission granted by DCC in August 2020. Decision appealed to An Board Pleanála (ABP). Permission granted by ABP with revised conditions on 08 April 2021. Currently under construction.	-
D4062/24 ABP-321745-25	Ginxo Trading Ltd.	Turnpike Lane at the Rear of No. 59-69 Drumcondra Road Lower, Co. Dublin	Residential Development at Drumcondra Road  The development will consist of the construction of 46 no. apartments consisting of 33 no. 2-bedroom 4 person apartments, 1 no. 2-bedroom 3 Person, and 12 no. 1 bedroom apartments all with balconies to the South, West, East and North in a single block ranging in height from 2 to 6 storeys with 408sqm of landscaped communal open space at ground level and 89sqm of communal roof terrace at fifth floor level; the provision of 2 no regular car parking spaces, 1 no. disabled space, 100 no regular secured bicycle parking spaces, 2 no secured cargo bicycle spaces, bicycle maintenance area, bin store, ESB distribution station, ancillary plant/services with enabling and site development works, landscaping, boundary treatment, lighting, services and connections,	Permission granted by DCC in December 2024. Decision appealed to An Board Pleanála (ABP). Permission granted by ABP with revised conditions on 16 May 2025.	AA Screening

Ref.	Applicant	Location	Description - overview	Status	Environmental Assessments
			waste management and other ancillary works. The gross floor area of the building to be 4233 sqm all at this site of 0.17 hectares.		
LRD6067/24-S3	Malkey Limited	The Former Leydens Wholesalers & Distributors 158A, Richmond Road, Co. Dublin, D03 YK12	Permission for amendments to a permitted Mixed-Use LRD  Permission sought for amendments to a permitted LRD whose parent permission was granted under DCC under Reg. Ref. LRD6006/23-S3. The 0.55-ha site will consist of a revised roof design layout to provide 9 no. PV panels on Block A and 1 PV Panel on Block C.	Permission granted by DCC on 29 August 2024.	NIS; AA
ABP-317136-23 LRD6006/23-S3	Malkey Limited	158A, The Former Leydens Wholesalers & Distributors, Richmond Road, Co. Dublin, D03 YK12	Permission for development LRD site along Richmond Road  The development consists of demolition of existing industrial structures on site and a construction of a mixed-use development including artist studios, creche, retail unit, gym, and 133 no. residential Units across 3 no blocks and ranging in height from 1-8 storeys. The proposed development will provide ancillary residential amenities and facilities including parking including EV charging, loading bays, communal open space, roof gardens, lighting, ESB substation, common rooms, stores, and associated works above and below ground.  Improvement works to Richmond Road are also proposed including carriageway widening up to circa six metres in width, a 1.5-metre-wide one-way cycle track/lane in both directions, widening footpaths both directions, and adding a pedestrian crossing facility.	Permission granted by DCC in April 2023. Decision appealed to An Board Pleanála (ABP). Permission granted by ABP with revised conditions on 31 August 2023.	NIS, EIA Screening & EcIA
WEBLRD6055/2 5-S3A	Banner A Cuig Limited	No. 19 Esmond Avenue (D03 P5C7 & D03 Y2R2), No. 21 Esmond Avenue (D03 P923), & at rear No. 19 Philipsburg Avenue	Proposed amendment seeking permission for LRD application on Esmond Ave  The proposed development is sitting on a site of 0.161 ha consisting of a new apartment block (Block C) and constitutes an amendment to the permitted LRC granted permission previously (LRD6015/22-23 and ABP-	Permission granted by DCC on 27 May 2025.	NIS; EcIA; EIA Screening Report

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Ref.	Applicant	Location	Description - overview	Status	Environmental Assessments
		(D03 Y0A2), Fairview, Co. Dublin	315584-23). Proposed Block C will be 3 storeys high, with blue-green roof and roof mounted solar p.v. There will be 21 apartments, internal bin storage, bicycle parking. A communal area will be to be back of the block with a children's play area.  The proposed development includes demolition of existing warehouse building at No. 21 Esmond Avenue (234.60 sqm), two storey business centre, single storey temporary building and warehouse building at No.19 Esmond Avenue (418.31 sqm), as permitted per Planning Reg. Ref. No. LRD6015/22-S3 (An Bord Pleanála Ref. ABP. 315584-23).		
LRD6015/22-S3 ABP-315584	Banner A Cuig Limited	61 & 63 Fairview Strand, 59A Fairview Strand, at Warehouse on Esmond Avenue, at 19 Esmond Avenue and 21 Esmond Avenue and at rear 19 Philips Avenue, Fairview, Co. Dublin	Planning permission for LRD & Protected Structure on Esmond Ave  Planning permission for development of a 0.58 ha includes two a derelict warehouse, dry-cleaner, and a disused underground car park on Fairview Strand/Esmond Ave for three blocks ranging from 2-5 storeys with 114 apartments and a street-level gym, café, shop, and relocated dry-cleaner. Block A will contain 35 apartments in 5 no. storeys with ground floor units of a gym and a shop unit. Block B will 2-5 storeys with 47 apartments with a ground floor café.  Two protected Georgian-era houses, at No. 61 & 63 Fairview Strand are restored and converted to four flats with a small contemporary wing added. 26 Underground car spaces will be kept along with 263 bicycle spaces, green roofs, solar-PV panels, two pocket plazas, playgrounds, and widened footpaths. Total open space provision of 1,409.6 square m including a public plaza with cycle parking. Public realm upgrades including new surface treatment of Esmond Avenue and upgraded pedestrian crossing points at the junction of Esmond Avenue and Fairview Strand.	Permission granted by DCC in December 2022. Decision appealed to An Board Pleanála (ABP). Permission granted by ABP with revised conditions on 05 May 2023.	NIS; EcIA; Bat Survey and Assessment of Associated buildings

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Ref.	Applicant	Location	Description - overview	Status	Environmental Assessments
4067/24	Fold Housing Association Ireland CLG	Former Dublin City Council Depot, Orchard Road, Drumcondra, Co. Dublin, D03 XV67	Planning Permission for Residential development on Orchard Road  The development consists of a 0.26 ha site along the River Tolka and is the former site of DCC depot and boxing club. The development will consist of the demolition of existing single storey sheds, warehouses and structures on site used as part of the former DCC depot and boxing club and provision of 2-5 story building including 38 no. apartments with a gross floor area of 2,825 sqm.  Vehicular and pedestrian access will still be provided via existing access on Orchard Road, and a new pedestrian access is provided to Tom Clake House. Ancillary works includes green roofs, plant rooms, nine stores, ESB substation, and community room at ground floor level.	Permission granted (with conditions) by Dublin City Council on 19 February 2025.	NIS, EIA Screening Report, EcIA
LRD6001/22- S3A ABP-315062-22	Scanron Ltd.	Site at Daneswell Place, Former Printworks/Smurfit Site, Botanic Road, Glasnevin, Co. Dublin	Proposed Amendment to Parent Permission LRD site at Daneswell Place  Proposed development consisting of amendments to the development permitted under DCC Reg 3665/15 and ABP ref 315062-22, as amended by DCC Reg Ref: 4267/17 and 2133/18 and extended by DCC reg ref: 3665/15X2  The development will include 168 no. apartments within 5 no. blocks ranging from 1-6 storeys. The proposal also includes a creche, café, resident amenity space, and an amenity management suit in Block A and a resident's gym.  Vehicular/pedestrian/cyclist access will be from Botanic Road. Car, cycle, and motorcycle parking at surface and basement are included. All associated site development works, public and communal open space, roof gardens, landscaping, boundary treatment, plant areas, waste management areas, and service provision (including ESB substations) will be provided.	Permission granted by DCC in October 2022. Decision appealed to An Board Pleanála (ABP). Permission granted by ABP with revised conditions on 06 March 2023.	AA Screening, EcIA, EIA Screening

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Ref.	Applicant	Location	Description - overview	Status	Environmental Assessments
LRD6009/23-S3 ABP-317438-23	St. Vincent's Hospital Fairview	St. Vincent's Hospital, Richmond Road and Convent Avenue, Fairview, Co. Dublin	LRD at St. Vincent's Hospital at Richman Road  The proposed development comprises of a LRD at Saint Vincent's Hospital, Richmond Road and Convent Avenue, Fairview, Dublin. The proposed development will consist of the redevelopment of the site to provide for a new hospital building, providing mental health services, provision of 9 no. residential buildings (Blocks A, B, C, D-E, F, G, H, J, and L), and community facilities, and public open space. The proposed building heights range from 2 to 13 storeys. The residential development includes a total of 811 no. residential units, including 494 no. standard design apartments (SDA) and 317 no. Build to Rent (BTR) apartments. The development includes the partial demolition and change of use, including associated alterations, of the existing hospital building (part protected structure under RPS Ref.: 2032), to provide residential amenity areas, a gym, a café, co-working space, a community library, a childcare facility, and a community hall (referred to as Block K). The development also includes additional residential amenities and facilities, a retail unit and a café. The proposed development includes for the demolition of existing structures on site, including extensions of and buildings within the curtilage of the existing hospital buildings under RPS Ref.: 2032, and other existing buildings and ancillary structures on the site; and the change of use, refurbishment and alterations of a number of buildings and protected structures on the site including Brooklawn (RPS Ref: 8789), Richmond House (RPS Ref.: 8788), the Laundry building and Rose Cottage.	Permission granted by DCC in May 2023. Decision appealed to An Board Pleanála (ABP). Permission granted by ABP with revised conditions on 11 October 2023.	EIAR & NIS
ABP-317121	National Transport	Swords Co. Fingal to Dublin City Centre Co. Dublin	BusConnects - Swords to City Centre Core Bus Corridor Scheme  The Swords to City Centre Core Bus Corridor Scheme consists of roadworks to facilitate bus, cycle, and urban realm improvements along	Permission granted (with conditions) on	EIAR & NIS;

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Ref.	Applicant	Location	Description - overview	Status	Environmental Assessments
	Authority (NTA)		with any associated ancillary/accommodation works for the scheme. The scheme has an overall length of approximately 12 km.  The scheme commences south of Swords at Pinnock Hill Junction and travel in a southerly direction along the R132 Swords Road past Airside Retail Park, Dublin Airport and Santry Park. The route will continue on the R132 past Santry Demesne, where the Swords Road joins the R104 at Coolock Lane. The route will continue on the R132 in a southerly direction through Santry village. It will continue along the Swords Road past Whitehall to Griffith Avenue. The route will follow Drumcondra Road Upper past the DCU St Patrick's Campus to the river Tolka. It will continue through Drumcondra, on Drumcondra Road Lower to Binns Bridge on the Royal Canal. From there it will continue on Dorset Street Lower as far as Eccles Street, from where it will continue on Dorset Street Upper to North Frederick Street and Parnell Square, all in County Dublin and within the Fingal County Council (FCC) and Dublin City Council (DCC) administrative areas.	19 June 2024 by An Board Pleanála.	
ABP-314610	National Transport Authority (NTA)	Ballymun/Finglas to City Centre Core Bus Corridor Scheme	BusConnects – Ballymun/Finglas to City Centre Core Bus Corridor Scheme  The Balllymun/Finglas to City Centre Core Bus Corridor Scheme comprises of an overall length of c. 10.9km including roadworks to facilitate bus, cycling and urban realm improvements along with any associated ancillary/accomodation works for the scheme. It is routed along Ballymun Road from the junction at St. Margaret's Road southwards along St. Mobhi Road, Botanic Road, Prospect Road, Phibsborough Road, Constitution Hill, and Church Street as far as the junction with Arran Quay/Ormond Quay on the River Liffey, and along the Finglas Road from the St. Margaret's Road junction to Prospect Road	Permission granted (with conditions) on 12 March 2024 by An Board Pleanála.	EIAR & NIS

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Ref.	Applicant	Location	Description - overview	Status	Environmental Assessments
			at Hart's Corner, as well as quiet-street cycle routes along Royal Canal Bank in Phibsborough, and through the Markets Area from Constitution Hill to Ormond Quay.		
ABP - 313182	National Transport Authority (NTA)	Clongriffin to City Centre Core Bus Corridor Scheme	BusConnects – Clongriffin to City Centre Core Bus Corridor Scheme  The Clongriffin to City Centre Core Bus Corridor Scheme has an overall length of c. 5.7km and is routed along the R107 Malahide Road from Mayne River Avenue – R107 Malahide Road Junction to the junction with Marino Mart – Fairview and also routed for cyclists via the junction with Malahide Road- Brian Road along Carleton Road, St. Aidan's Park, Haverty Road and Marglann Marino.	Permission granted (with conditions) on 08 January 2024 by An Board Pleanála.	EIAR & NIS
ABP-314724	Transport Infrastruct ure Ireland (TII)	Metrolink - Estuary through Swords, Dublin Airport, Ballymun, Glasnevin, and City Centre to Charlemont, Co. Dublin	Railway (Metrolink-Estuary to Charlemont via Dubin Airport) Order 2022  The proposed development comprises of a fully segregated and automated railway and metro mostly underground approximately 18.8km in length with 16 stations running from north of Swords at Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and the City Centre to Charlemont in the south of Dublin City Centre. It includes a 9.4km section of single bore tunnel running beneath Dublin City Centre running from Charlemont to Northwood Station and a 2.3km section of single bore tunnel running beneath Dublin Airport. North of Dublin Airport the railway will emerge from tunnel and will run at surface level and in cut and cover structures to Estuary Station. A new 99m bridge will be constructed over the M50 and a 261m long multi-span Viaduct over the Broadmeadow and Ward River. There will be a total of 16 stations, including 11 underground stations at Dublin Airport, Northwood, Ballymun, Collins Avenue, Griffith Park, Glasnevin, Mater, O'Connell Street, Tara, St. Stephen's Green and Charlemont; 4 retained cut stations at Seatown, Swords Central, Fosterstown and Dardistown and	Awaiting decision. Application lodged on 30 September 2022 to An Board Pleanála.	EIAR & NIS

Exception Value

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Ref.	Applicant	Location	Description - overview	Status	Environmental Assessments
DCC 2482/33	Deal Estate	O/Os Disharand	latgrade station at Estuary. A multi-storey 3000 space park and ride close to the M1 Motorway will be provided at Estuary Station, a maintenance depot is located near Dardistown Station which will house all the facilities required for the maintenance and operation of the MetroLink and its rolling stock and the Operational Control Centre. The works will also include railway signalling, command and control and communications systems; provision of electrical substations; establishment of temporary construction compounds; establishment of temporary traffic management and road diversions; new and realigned access routes and road junction improvements; diversion of existing utilities; provision of new drainage infrastructure; provision of environmental mitigation measures; and other infrastructural modifications to facilitate the overall project.	Mith draws and	AA Sanagina
DCC 3483/22 ABP-314092	Real Estate Acquisition s and Sales Limited	9/9a, Richmond Avenue, Fairview, Dublin 3 D03 DH66/D03 C6X9	Permission for development on Richmond Ave  The development will consist of 28 no. residential units in 2 no. apartment buildings ranging in height from 3-6 storeys (east block fronting Richmond Avenue 6 no. storeys, west block to rear of site 3 no. storeys). The east block provides 22 no. apartment units and the west block provides 6 no. apartment units. All units are intended to provide housing accommodation for the elderly.  Access to the development will be from Richmond Avenue. This entrance will provide access and egress for pedestrians only to the development. The development also proposes approx. 214 sq.m of communal open space, balconies/terraces associated with individual apartment units, associated secure bicycle and bin storage, hard and soft landscaping and all other associated site works and services above and below ground on an overall site area of approx. 908.48 sq.m. The	withdrawn appeal and written evidence was given to the Board March 8, 2023.  Granted permission with conditions by Dublin City Council on 20 June 2022. The decision was appealed to the ABP. Appeal withdrawn and final	AA Screening Report

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Ref.	Applicant	Location	Description - overview	Status	Environmenta Assessments	ı
			development proposes the demolition of approx. 595 sq.m of floorspace comprising single storey industrial units.	permission granted on 16 March 2023.		
ABP-314232	Córas Iompair Éireann	40km rail upgrade from Connolly Station and new Spencer Dock station in the east to M3 Parkway and a new depot west of Maynooth.	Dart+ West Railway Order- Dublin City to Maynooth and M3 Parkway Railway works from the city centre to Maynooth and M3 Parkway, largely on existing railway lines (approx.40km). Works include electrification, closure of level crossings, modification of bridges, a new depot and new Spencer Dock station.	Railway order permitted (with conditions) by An Board Pleanála on 18 July 2024	EIAR & NIS	
ABP-320164	Córas Iompair Éireann	Modifications to the existing railway line between Dublin City Centre and Drogheda, located in Counties Dublin, Meath and Louth.	DART + Coastal North Railway Order 2024 - Northern Line between Dublin City Centre and Drogheda including the Howth Branch  The proposed development includes extension of the existing electrification from Malahide to Drogheda (approx. 37km) including the installation of overhead line equipment & associated substations; infrastructure works to facilitate the increase in service frequency and capacity.	Decision is awaited on the application. The application was lodged in July 2024.	EIAR & NIS	
ABP - 313289	Eastwise Constructi on Swords Limited	'Hartfield Place', Swords Road, Whitehall, Dublin 9	'Hartfield Place', Swords Road, Whitehall, Dublin 9  The proposed development comprises of strategic housing development for 472 no. residential units, residential amenities, a creche, a café and all associated site development works.	Permission granted with conditions on 16 November 2022 by An Bord Pleanála	EIAR & Screening	AA
D0533-01	Uisce Eireann	New wastewater treatment plant in the townland of	Greater Dublin Drainage Project consisting of a new wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility in County Dublin	Decision awaited. The application was	EIAR & NIS	

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Ref.	Applicant	Location	Description - overview	Status	Environmental
					Assessments
		Clonshagh and	The Proposed Project will comprise a new Wastewater Treatment Plant	lodged in December	
		associated sludge hub	(WwTP) at Clonshaugh and associated infrastructure that will serve the	2021.	
		centre, orbital sewer,	projected wastewater treatment requirements of existing and future		
		outfall pipeline and	drainage catchments in the north and north-west of the Ringsend		
		regional biosolids	Agglomeration (i.e. catchments currently draining to Ringsend WwTP),		
		storage facility in	up to the Proposed Project's 2050 design horizon. The Proposed Project		
		various townlands in	will therefore protect public health, safeguarding the environment and		
		County Dublin	facilitating social and economic growth to 2050 and beyond.		

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Figure 23.1 Permitted and proposed developments to which regard has been had in the assessment of potential cumulative impacts



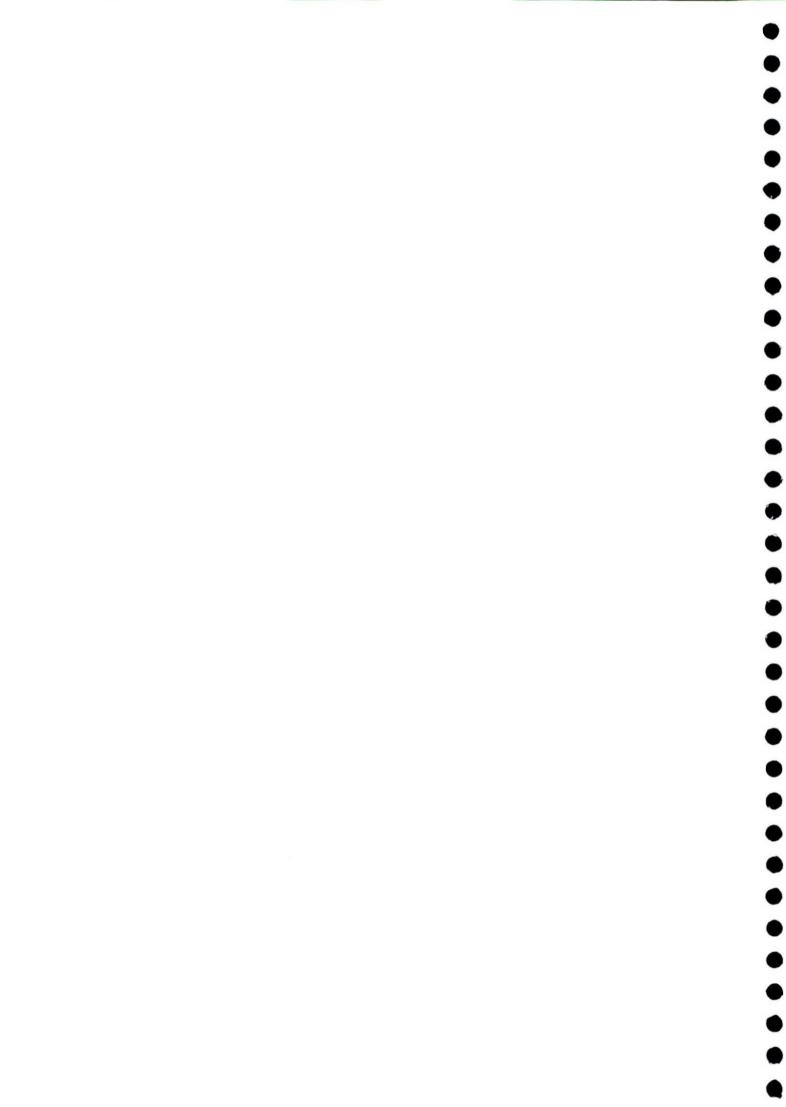
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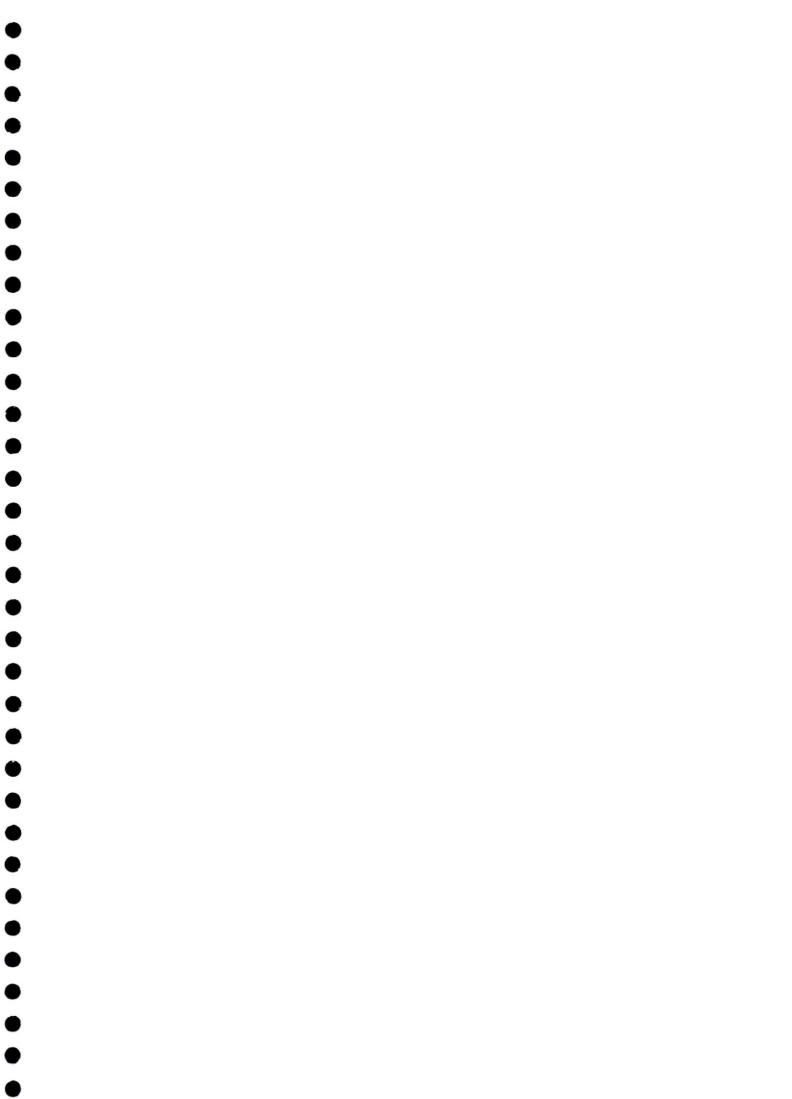
Environmental Impact Assessment Report (EIAR) Volume 1: Non-technical Summary (NTS)

# 24 Mitigation Measures & Monitoring

This Chapter of the Environmental Impact Assessment Report lists the mitigation measures prescribed in all of the preceding Chapters of the Environmental Impact Assessment Report – the measures required to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment – as well as all monitoring measures / programmes prescribed, for both the construction and operational phases.

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