Proposed Residential Development at St. Andrew's Court, Fenian St., Dublin 2

EIA Screening in accordance with the Planning and Development Regulation 2001 (as amended)

Brady Shipman Martin

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Environmental Assessment **Built Environment**

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1 Introduction

Dublin County Council (DCC) is seeking permission or the development of social housing at St. Andrew's Court on the corner of Fenian Street and Sandwith Street Upper, Dublin 2 (hereinafter 'the proposed development'). The proposed development will consist of the demolition of the existing 3 storey building, which is currently vacant, site clearance and the provision of 33no. residential units all with private amenity space in 2 interconnected blocks arranged around a communal courtyard. Bike parking, bin store and plant rooms are also provided at ground floor level. The building ranges in height from 1 to 7 stories, with communal roof garden located on roof of the 4-storey block. These new homes will be for social housing and will be managed by Dublin City Council.

1.1 Statement of Purpose

Brady Shipman Martin (BSM) was appointed to prepare an Environmental Impact Assessment (EIA) Screening Report in relation to the proposed Local Authority Own Housing Development in accordance with the requirements of the 2000 Act and the 2001 Regulations (as outlined hereinafter).

1.2 Qualifications

This EIA Screening Report has been prepared by Namrata Kaile, Ecologist and Environmental Consultant at Brady Shipman Martin. She holds a Bachelor's Degree (BSc) in Life Sciences from University of Delhi and a Master's Degree (MSc) with distinction in Environmental Sciences from Trinity College Dublin. She is an associate member of Chartered Institute of Ecology and Environmental Management (CIEEM) and has been working professionally in the field of environmental consultancy for the last four years. Namrata is experienced in drafting and reviewing EIA Screening Reports, AA Screening Reports as well as in coordination of EIARs.

A technical review of this document has been completed by Thomas Burns B.Agr.Sc. (Landscape); Dip. EIA Management; Ad. Dip. Planning and Environmental Law; MILI, MIELA, and Partner with Brady Shipman Martin. He is a member of the Irish Landscape Institute and the IELA. Thomas has over 30 years of experience in EIA.

2 Background and Methodology

2.1 Legislation

The key legislative provisions of relevance to the EIA screening exercise are as follows:

- Directive 2014/52/EU amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (hereinafter the 'EIA Directive');
- Planning and Development Act 2000 as amended (hereinafter the 'PDA 2000'); and
- Planning and Development Regulations 2001 as amended (hereinafter the 'PDR 2001').

2.2 Guidelines

In the preparation of this document, regard has been had to the following guidance documents:

- Department of Housing, Planning and Local Government (DoHPLG) (2018). *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment;*
- Environmental Protection Agency (EPA) (2022). *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports;*
- European Commission (2017). *Environmental Impact Assessment of Projects – Guidance on Screening; and*
- Office of the Planning Regulator (OPR) (2021). *OPR Practice Note PN02: Environmental Impact Assessment Screening.*

2.3 Legislative Context

The EIA Directive entered into force in 1985 (Directive 85/337/EEC). It aims to ensure a high level of protection for the environment and human health, through the establishment of minimum requirements for environmental impact assessment (EIA) for the purposes of development consent for public and private developments that are likely to have significant effects on the environment.

The EIA Directive was amended three times (in 1997, 2003 and 2009) and subsequently codified by Directive 2011/92/EU and amended in 2014 by Directive 2014/52/EU. The EIA Directive is transposed into Irish legislation through the Planning and Development Act 2000-2024 and the Planning and Development Regulations 2001-2024.

Part 1 of Schedule 5 of the PDR 2001 lists the classes of development for which EIA is a mandatory requirement. Part 2 of Schedule 5 sets out specific thresholds for classes of development, at or above which, EIA is also a mandatory requirement. 'Sub-threshold development' refers to developments of a class listed in Part 2 of Schedule 5, which do not meet or exceed the stated threshold, and these developments are subject to screening for the requirement for 'sub-threshold EIA'.

Schedule 7 of the PDR 2001 sets out the criteria that must be considered in determining whether a sub-threshold project should be subject to EIA. Schedule 7A lists the information that the applicant must submit to the competent authority for the purposes of an EIA screening determination, i.e. the information that must be contained in the EIA Screening Report. This is a step-by-step process known as 'screening for EIA' (refer to **Figure 2.1**).

The objective of screening for EIA is to ascertain whether there is a real likelihood that a project's effects on the environment would be significant and, therefore, whether full EIA (and the preparation of an Environmental Impact Assessment Report (EIAR)) is required.

2.4 Approach to EIA Screening Process

EIA Screening follows a three-step process (DoHPLG, 2018; OPR, 2021) – refer to **Figure 2.1**:

Step 1: Understanding the proposal / proposed development;

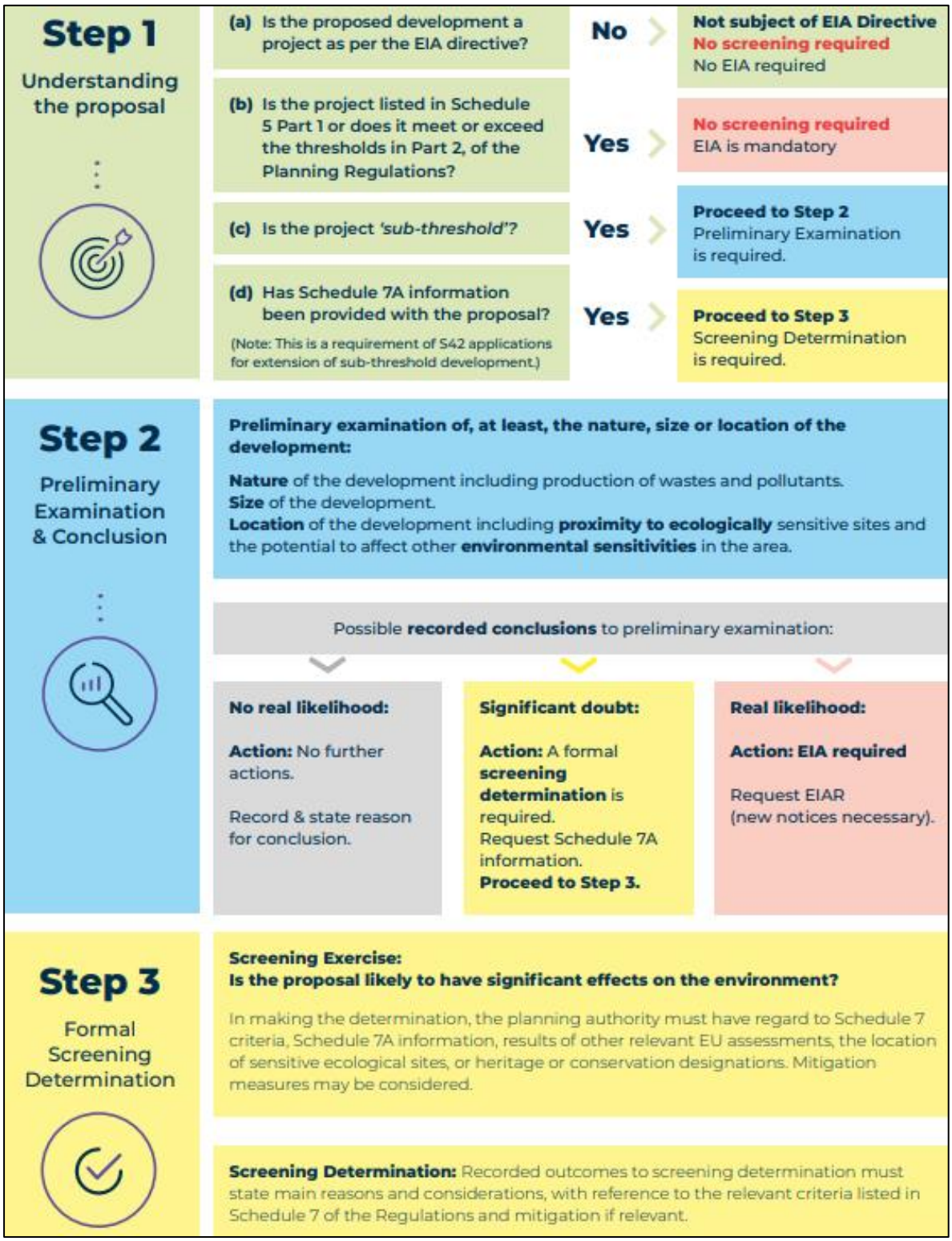
Step 2: Preliminary examination and conclusion; and

Step 3: Screening determination (by competent authority).

In order to assist the competent authority (Dublin City Council) to carry out the screening for EIA, this report provides the following information:

- A description of the Project for concluding, with reference to Part 1 and Part 2 of Schedule 5 of PDR 2001, if the proposal is a 'project', and if it is:
  - of a type where the requirement for EIA is mandatory, or
  - of a type and scale that meets or exceeds a stated threshold at or above which the requirement for EIA is mandatory;
- Consideration for the requirement for the proposal / proposed development to be subject to sub-threshold EIA, including the provision of information required and as set out in Schedule 7A of PDR 2001.

Figure 2.1 Step-by-Step Approach to EIA Screening for Development Proposals (OPR, 2021)



3 Understanding the Proposal / Proposed Development

3.1 Description of the Proposed Development

The proposal is for construction of new development consisting of 33 no. residential units all with private amenity space in 2 interconnected blocks arranged around a communal courtyard. These new homes will be for social housing and will be managed by Dublin City Council.

Bike parking, bin store and plant rooms are also provided at ground floor level. The building ranges in height from 4 to 7 stories, with communal roof garden located on roof of one of the 4 storey blocks.

To facilitate the proposed development the scheme will require demolition of an existing 3 storey building which is currently vacant.

Refer to **Figure 3.1** for the proposed ground floor plan for the development.

Refer to **Figure 3.2** for the proposed demolition site plan.

Figure 3.1 Proposed ground floor plan for proposed development at St. Andrews Court, Dublin 2 (*O'Donnell + Tuomey, 2024*)

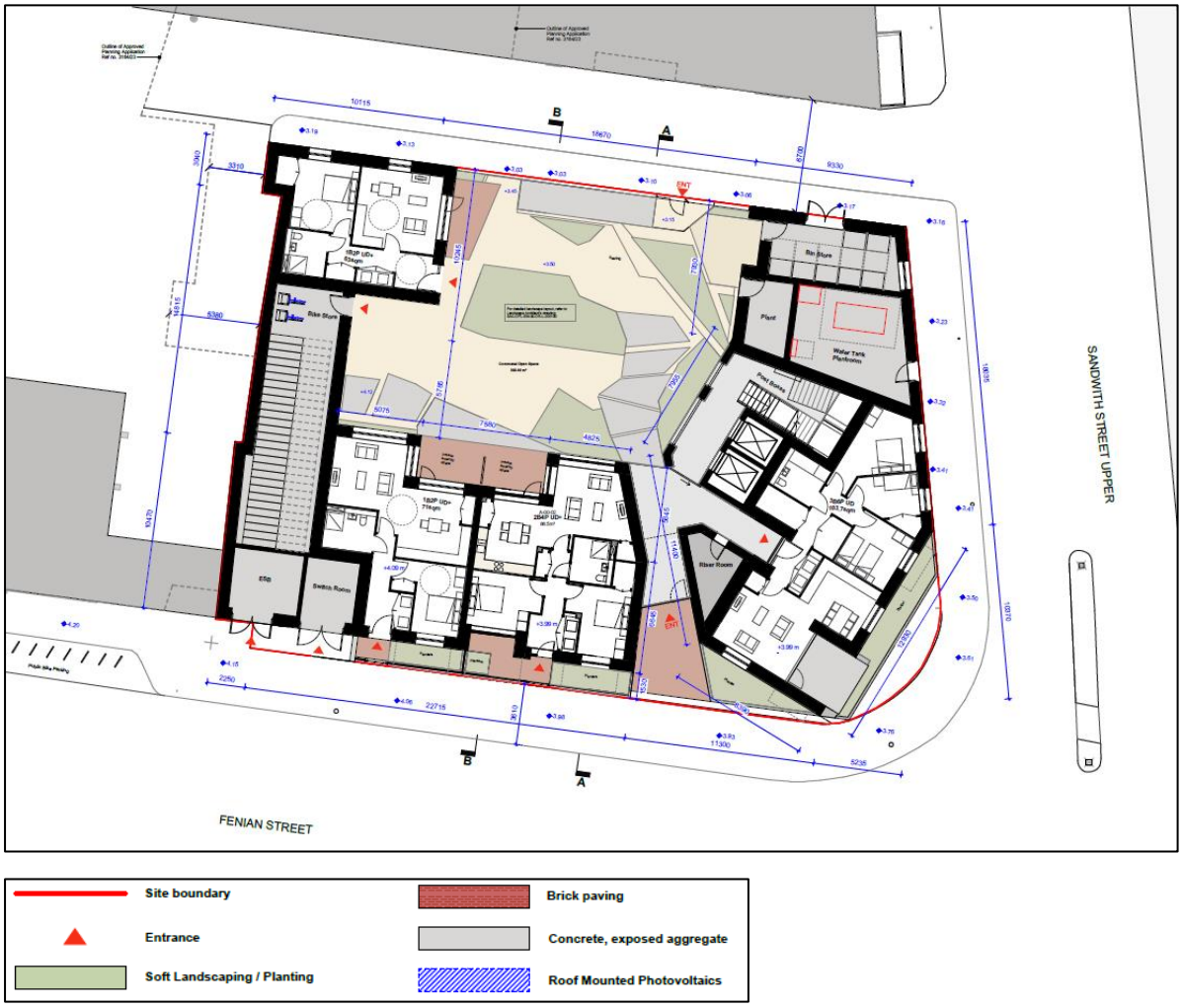
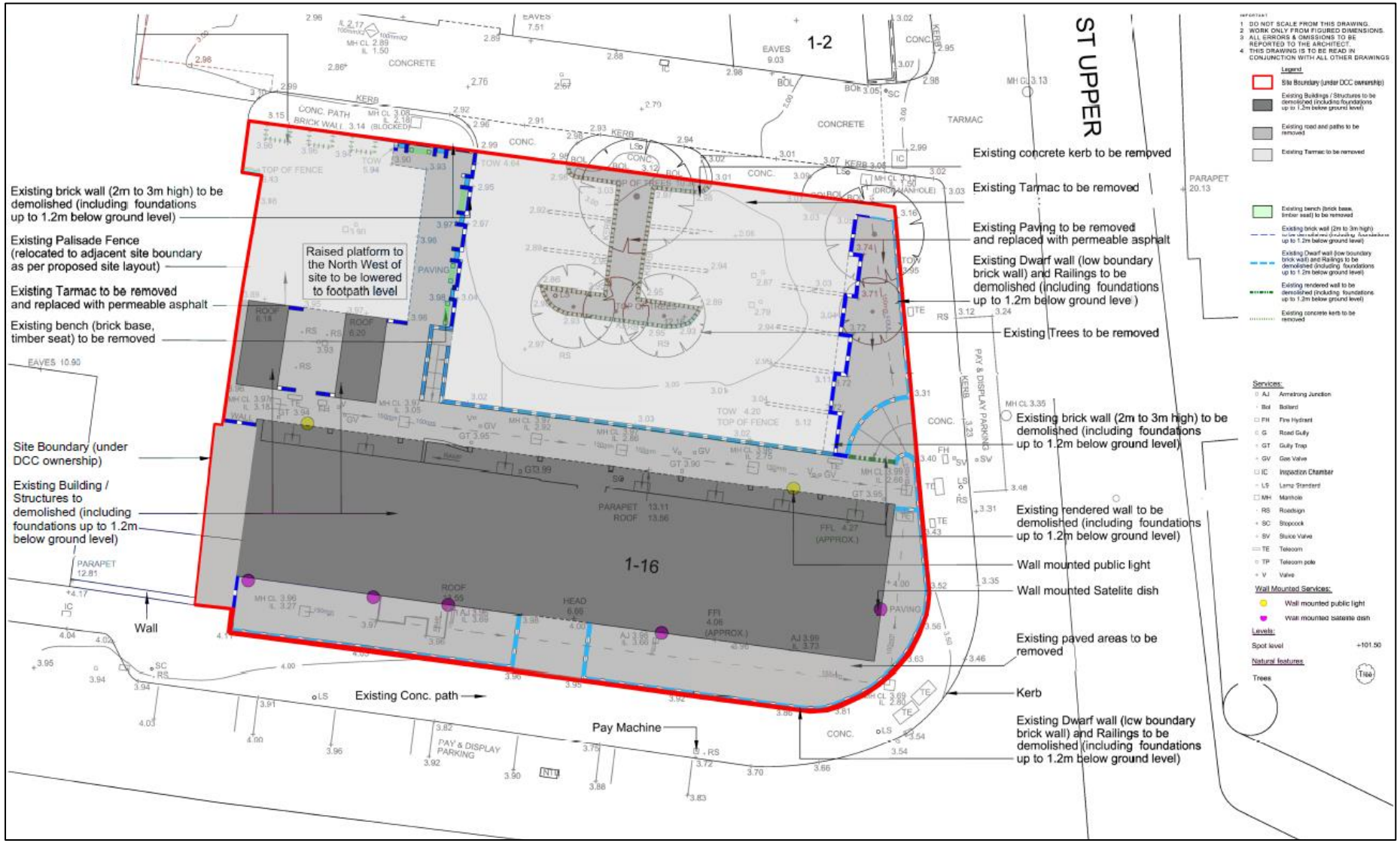


Figure 3.2 Proposed demolition site plan for proposed development at St. Andrews Court, Dublin 2 (O'Donnell Tuomey, 2024)



3.2 Requirement for EIA or for Screening for 'Sub-threshold EIA'

The proposed site comprises an unoccupied three-storey Dublin City Council residential block known as St. Andrew's Court located at the corner of Fenian Street / Sandwith Street Upper. The rest of the site is occupied by surface car parking, 2 small sheds and some hard landscape elements, including a raised amenity area in poor condition. The area for the existing site extends to c. 0.12ha.

The proposed development is for the redevelopment of St. Andrew's Court, including the demolition of the existing unoccupied residential block and site clearance and the provision of 33no. residential units all with private amenity space in 2 interconnected blocks arranged around a communal courtyard.

This stage establishes whether, with reference to Part 1 and Part 2 of Schedule 5 of PDR 2001, the proposal / proposed development, is a 'project' within the meaning of the EIA Directive and if it is of a type where the requirement for EIA is mandatory (Part 1 of Schedule 5), or of a type and scale that meets or exceeds a stated threshold at or above which the requirement for EIA is also mandatory (Part 2 of Schedule 5).

Classes of development listed in Part 1 of Schedule 5 of the PDR 2001 relate to major industrial and infrastructural projects (*e.g.* power stations, refineries, metal works, major pipelines and powerlines, and mines). The proposed development does not conform to any of the classes of development and therefore is not a 'project' as set out in Part 1 of Schedule 5 of PDR 2001. Therefore, there is no requirement for mandatory EIA under this provision.

With reference to Part 2 of Schedule 5 of the PDR 2001, the proposal can be considered a 'project' within a class / type of development as set out in **Table 3.1**.

Table 3.1 Applicable Classes of Development for the purposes of Screening for the requirement for EIA

Provision (Part 2 of Schedule 5 of PDR 2001)	Proposed Development	Pre-screening Assessment
Schedule 5, Part 2, paragraph 10(b)(i): *"Construction of more than 500 dwelling units."*	33 dwelling units	**Requirement for Mandatory EIA -** The proposed development does not meet or exceed the stated threshold. Therefore, EIA is not a mandatory requirement. **Requirement for Sub-threshold EIA -** The proposed development is of a class / type listed in this provision but being significantly below the stated threshold is considered to be 'sub-threshold'. The proposal should be screened for the requirement for 'sub-threshold EIA'
Schedule 5, Part 2, paragraph 10(b)(iv): *"Urban development which would involve an area greater than **2 hectares** in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere."* *"(In this paragraph, "business district" means a district within a city or town in which the predominant land use is retail or commercial use.)"*	Site area of 0.12 ha located within a business district.	**Requirement for Mandatory EIA -** The proposed development does not meet or exceed the stated threshold. Therefore, EIA is not a mandatory requirement. **Sub-threshold development-** The proposed development is of a class / type listed in this provision but is significantly below the stated threshold. The proposal should be screened for the requirement for 'sub-threshold EIA'
Schedule 5, Part 2, paragraph 14: Paragraph 14:	Demolition of existing 14 unit	**Requirement for EIA -**

Provision (Part 2 of Schedule 5 of PDR 2001)	Proposed Development	Pre-screening Assessment
"Works of demolition carried out in order to facilitate a project listed in Part 1 or Part 2 of this Schedule where such works would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7."	unoccupied residential block and associated site clearance	The extent and scale of demolition is very small in the context of the city centre location and, having regard to the criteria set out in Schedule 7, such works are unlikely to have significant effects on the environment.

The pre-screening exercise has concluded that the proposed development is 'sub-threshold' in respect of development classes 10(b)(i) and 10(b)(iv) as listed in Part 2 of Schedule 5 of the PDR 2001, and therefore should be screened for the requirement for 'sub-threshold EIA' in accordance with Article 120 of the PDR 2001, to determine whether there is a likelihood of significant effects and, therefore, whether EIA is required for the proposed development.

4 Preliminary Examination / Screening for requirement for Sub-threshold EIA

4.1 Preliminary Examination: Screening for 'Sub-threshold EIA'

This stage considers whether the proposal / proposed development should, or should not be, subject to the requirement for 'sub-threshold EIA' and the preparation of an EIAR.

It provides the information required of the applicant, as set out in Schedule 7A of PDR 2001, to allow the Competent Authority to carry out a preliminary examination of, at least, the nature, size or location of the development, (including proximity to ecologically sensitive sites and the potential to affect other environmental sensitivities in the area) and to make a determination as to whether there is a real likelihood of significant effects on the environment, as specified in Schedule 7A of the PDR 2001, and with reference to the criteria in Schedule 7 of the PDR 2001.

Schedule 7A of the PDR 2001 requires the applicant to provide:

> *"1. A description of the proposed development, including in particular—*
>
> *(a) a description of the physical characteristics of the whole proposed development and, where relevant, of demolition works, and*
>
> *(b) a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.*
>
> *2. A description of the aspects of the environment likely to be significantly affected by the proposed development.*
>
> *3. A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from—*
>
> *(a) the expected residues and emissions and the production of waste, where relevant, and*
>
> *(b) the use of natural resources, in particular soil, land, water and biodiversity.*

4. *The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7.*

This information is provided in the following sections.

4.2 Description of the Proposed Development

An overview of the description of the proposed development is provided at **Section 3.1** of this report. In addition to the planning drawings and other reports, the application is also accompanied by the following specific reports:

- St. Andrew's Court Part 8 Report (O'Donnell + Toumey, 2024)
- Archaeological Assessment (Irish Archaeological Consultancy Ltd, 2022)
- Architectural Heritage Impact Assessment (JCA Architects, 2022)
- Resource Waste Management Plan (Horganlynch Consulting Engineers, 2024)
- Appropriate Assessment Screening Report (Enviroguide Consulting, 2024)
- Invasive Species Report (Eco Éireann, 2022)
- Breeding Bird Survey (Enviroguide, 2020)
- Bat Survey Report (ASH Ecology and Environmental, 2024)
- Tree Schedule (Charles McCorkell Arboricultural Consultancy, 2021)
- Engineering Report- Civil Infrastructure – Water and Drainage Services and Flood Risk Assessment Report (Horganlynch Consulting Engineers, 2024)

Further detail on the proposal / proposed development is provided in the following sections.

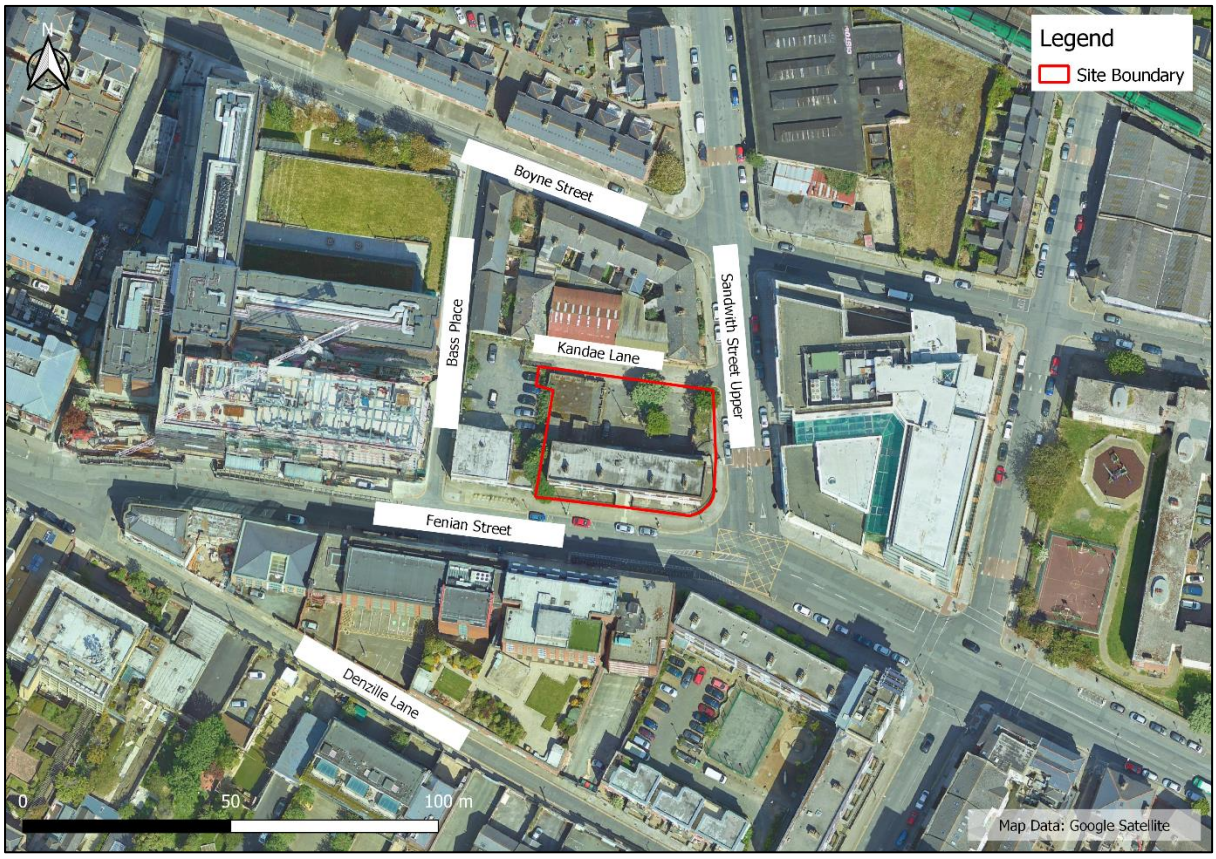
4.2.1 Background

The St Andrew's Court complex is a residential Dublin City Council development constructed in the 1970's comprising of three blocks. Block 1 is located on the north side of Fenian Street at the intersection of Sandwith Street Upper, refer to **Figure 4.1**. Blocks 2 and 3 are located to the south of Fenian Street. The proposed development relates solely to Block 1 and its grounds.

The site comprises an existing three-storey residential block (Block 1 of St. Andrew's Court), an area of parking and hard-standing. The block which is currently unoccupied, had served as senior citizens dwellings consisting of two 1-bedroom apartments and four studio / bedsit apartments on the ground floor with eight two-storey duplex units across the first and second floors. The building fronts Fenian Street and has a blank gable to Sandwith Street Upper and the iconic Archer's Garage opposite. A small carpark with access via Kandae Lane is located to the north of the building. The building is of poor visual and townscape quality.

While buildings to the immediate north and west are generally two-storey residential, the majority of the surrounding buildings are four to seven-storeys in height, including the recently completed part seven-storey Cumberland Place offices on Fenian Street c. 30m to the west of the site. Construction of a seven-storey 28 apartment building is on-going at the junction of Sandwith Road Upper and Boyne Street less than 50m north-east of the site.

Figure 4.1 The location of the proposed development site at St. Andrew's Court, Dublin 2 (red line is indicative- refer to associated planning documents)



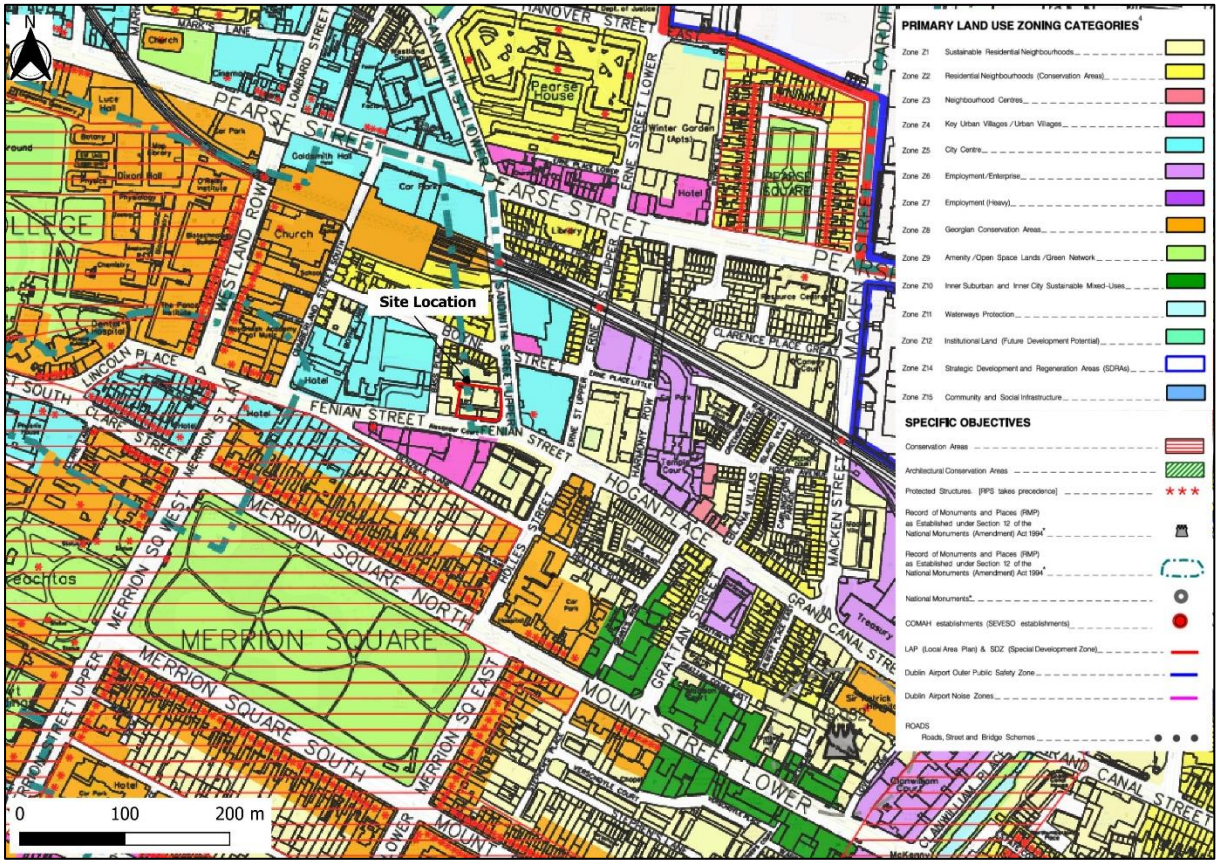
4.2.2 Planning Context

The proposed site has historic residential use and as per the *Dublin City Development Plan 2022-2028* is zoned Zone 1: Sustainable Residential Neighbourhoods - *To protect, provide and improve residential amenities* (refer to **Figure 4.2**). Lands to the immediate west and north and to south-east are under similar zoning. Residential neighbourhood (conservation areas) (Zone 2 zoning) lie along Boyne Street further north. The majority of lands to the east of the site – east Sandwith Street Upper, including Archer's Garage – are zoned Zone 5: City Centre - *To consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity*. Lands to the south of the site – south of Fenian Street are zoned Zone 4: Key Urban Villages / Urban Villages - *To provide for and improved mixed-services facilities*.

Archer's Garage, with its art deco details and undercut corner, is located on the corner of Fenian Street and Sandwith Street Upper – directly east of the site, across Sandwith Street Upper. It was reconstructed in 2004 and is a 'Protected Structure' (RPS No. 2744). The eastern portion of the site is also located within *Record of Monuments and Places (RMP) as Established under Section 12 of the National Monuments (Amendment) Act 1994.*

The proposed redevelopment of the site is in accordance with the existing land use zoning. An Archaeological Assessment (Irish Archaeological Consultancy Ltd, 2022) and an Architectural Heritage Assessment (JCA Architects, 2022) accompany the Part 8 documents.

Figure 4.2 Extract from Map E Dublin City Development Plan 2022-2028 (proposed site outlined in red)



The Housing Strategy of the Development Plan (Appendix 1) notes that - *The interim HNDA* (Housing Need Demand Assessment) *for the Dublin City Development Plan 2022-2028, forecasts that housing need in the Dublin City administrative area will comprise 27,219 households over the plan period*. Among the options noted for delivering social housing is *"The construction of new dwellings for social rental, cost rental and affordable purchase (including estate and area-based regeneration schemes and renovation and renewal of unoccupied or vacant public housing stock)".*

In this regard it is noted that the existing residential block consists of 14 poor quality dwelling units which it is proposed to replace with 33 high-quality units. The existing block is also of poor quality in terms of its condition and overall visual and streetscape appearance.

4.2.3 Demolitions and Waste

Block 1 at St. Andrew's Court is a three-storey block comprising 14 currently unoccupied residential units laid out as two 1-bed apartments and four bedsits on the ground floor with eight two-storey duplex units across the second and third floors. There are also two small pram sheds and areas of hard standing / car parking on the site. The carpark is accessed via Kandae Lane to the north of the site.

As stated in the Resource Waste Management Plan (Horganlynch Consulting Engineers, 2024), removal of any hazardous materials identified will be carried out initially. A complete site asbestos survey will be made available to the demolition contractor. Any asbestos cement containing materials identified will be removed by specialist contractors and transported for disposal in suitable licenced facilities. The Health and Safety Authority (HSA) will be notified of the handling of the asbestos material and all work

will comply with the relevant legislation and guidelines for dealing with asbestos material. Soft Strip will then be carried out to remove all building services and contents including ceilings piping, services, stud walling, floor and wall coverings. These will be separated into Timber, Clean Concrete Rubble, Scrap Metal and Mixed Demolition Waste for removal to suitable off site locations.

Sub soil excavation or removal required at the site is limited to that required for new ground beam and pile construction – no accommodation is proposed below ground level. Landscape soil and materials will also be removed from the site. No hazardous material has been identified in soil samples taken from trial pits at the site and laboratory tested for contaminants. Suitable provision for separation and storage of small quantities of hazardous materials that may be encountered will be made for items such as: Electrical and Electronic Components, Batteries and Liquid Fuels. These will then be dealt with in conformity with relevant guidelines and legislation.

On removal of all hazardous material and the soft strip items the elements of the existing building structures to be removed will be taken down in a planned progressive sequence. These works are within the existing site boundaries and will not impact structurally on neighbouring buildings. The building structure materials will then be separated to Timber, Steel / Metal, Concrete and some Mixed Demolition Waste. These materials will be stockpiled for removal from the sites for recycling and disposal in compliance with all relevant legislation, regulation and industry best practice requirements.

All demolition will be carried out in a controlled manner to ensure all materials remain on the site footprint. Detailed method statements for the works will be prepared by the contractor to ensure that all remaining structures not being demolished at a particular time remain structurally stable. All primary waste materials – Concrete, Metal and Timber will be separated for transport to suitable recycling facilities. Materials unsuitable for salvage or recycling will be stored separately and disposed of at a suitable facility.

For further information refer to the Resource Waste Management Plan (Horganlynch Consulting Engineers, 2024) for the proposed works at St. Andrew Court Block 1.

4.2.4 Water Infrastructure

4.2.4.1 Water Supply

The Engineering Report (Horganlynch Consulting Engineers, 2024) states that there is an existing Dublin City Council mains water supply to the site from the Irish water mains water line in Sandwith St Upper to the east side. The existing mains water supply will not continue to serve the development and a new connection to existing Dublin City Council mains water in Fenian Street is proposed.

Based on the proposed 59 persons occupancy for the proposed developed, the average daily domestic demand is calculated to be 0.1 litres/sec.

4.2.4.2 Surface Water Drainage

The Engineering Report (Horganlynch Consulting Engineers, 2024) states that the proposed site will be served by the existing combined sewer on Sandwith Sreet Upper to the north-east corner of the site.

The proposed surface water drainage system for the site will be designed and constructed as a separate system. The proposed site storm drain will discharge to the existing public 1940x760mm brick sewer on Sandwith Street Upper to the north corner.

The management of surface water for the proposed development has been designed to comply with policies and guidelines outlined in the Greater Dublin Strategic Drainage Study (GDSDS) and with the requirements of Dublin City Council and storm water drainage has been designed in accordance with the Greater Dublin Code of Practise for Drainage Works.

The sustainable drainage system (SuDS) features have been proposed to prioritise interception and reduction of flow rates. SuDS features such as green roofs are proposed as part of the development. The proposed attenuation storage volumes have been calculated based on allowable outflow runoff rate of 2l/s/ha as required by Dublin City Council and attenuation volume was calculated for 100-years storm event. The storm water drainage design also accounts 20% for climate change. It is proposed that the site surface water drainage from the newly developed buildings will be drained using a surface water attenuation system with 20m^3 attenuation storage tanks and discharge limited to 2.0l/s to the existing 1940x760mm brick combined sewer on Sandwith Street Upper to the north-east of the site.

4.2.4.3 Foul Water Drainage

The Engineering Report (Horganlynch Consulting Engineers, 2024) states that the proposed foul drainage system on the site has been designed and will be constructed as a separate system. The existing main site will drain to the existing 1940x760mm brick combined sewer on Sandwith St. Upper.

The foul water drainage system's requirements has been determined using the EPA guidelines. The EPA guidelines has been used to estimate the peak flow based on an overall daily foul water discharge from the building. The Maximum Design Flow (6DWF) based on water usage of 200 litres per person per day for residential units has been calculated to be 1.52l/s.

The proposed site drain discharge connections have been sized with adequate capacity for the design discharge from the proposed development. All new kitchen drain connections to the system will be via suitably designed grease trap treatment arrangements to comply with relevant FOGS regulations.

The foul drainage system has been designed as a separate system to the storm drainage system and discharges to the public combined sewer in Sandwith St Upper via new combined connection from the site.

4.2.5 Architectural Layout and Design

The St. Andrew's Court Part 8 Report (O'Donnell + Tuomey, 2024) states that the site is located in the core of the historic city within 5 minutes' walk of Merrion Square and Trinity College, this small but significant corner site is at a transition point between civic/commercial buildings and established residential pockets. It is well served by public transport. The corner of the site closes a long vista from MacQuay's bridge on the grand Canal, along Grand Canal St and Hogan Place, an important pedestrian and vehicle route from the southern suburbs to the city centre.

The site is located at the junction of Fenian Street and Sandwith Street. The eastern site boundary is formed by Sandwith Street, a busy cross city traffic route. On the opposite corner of Sandwith Street is Archer's Garage, a 2004 facsimile reconstruction of a white 1940s art-deco building which is a Protected Structure. Fenian Street forms the southern boundary. This a quieter street with mainly local traffic. It has a mixture of commercial, residential and hotel uses, generally between four and six storeys with some new buildings of seven/eight storeys in height.

The northern boundary of the site is defined by the footpath towards Kandae Lane. This dead-end laneway provides access to a row of 2 storey, largely disused, light industrial properties to the north, as well as vehicular access to the site, in its current condition, on the south. The western boundary of the site currently abuts a small disused one/two storey building which sits on the corner of Fenian Street and Bass Place. However, it should be noted that planning approval has been granted for an eight/ten storey development on this site (application no. 3164/23). Should it be built, the development will share the entire western boundary of St Andrew's Court.

Two of the ground floor units are accessed directly from Fenian Street. The remaining ground floor unit is accessed from within the communal, gated courtyard. Within the courtyard, two lifts and a stairway lead to external walkways at upper levels which provide access to the remaining units. There are two points of entry to the communal courtyard. First is the main entrance from Fenian Street which marks the transition from the civic domain of the Street to the private residents' courtyard. The second entrance is from the lane to the north of the site where a gate leads to a gently sloped approach into the courtyard.

At ground floor, apartments occupy the full depth of the building towards Fenian Street and Sandwith Street, creating dual aspect homes. Substation and associated switchroom accessed from Fenian street with bike store to the north accessed from courtyard. Plant and bin store occupy the north-east corner on this level. At Level 01 and above, all units benefit from fenestration towards the external access decks as well as fenestration and private balconies towards Fenian Street, Sandwith Street and the laneway to the north of the site, thus ensuring every home in the scheme is dual aspect.

The scheme provides a variety of 1-bed, 2-bed and 3-bed layouts, each designed to be light filled and spacious whilst taking full advantage of views and orientation. All layouts avail of generous open plan kitchen, living and dining areas while utility cupboards, storage spaces and bathrooms are positioned close to each entrances. All apartment types exceed the minimum area requirements set out in the Sustainable Urban Housing, Design Standards for New Apartments (2020).

Private amenity space for upper floor units is provided via semi-recessed balconies which are integrated into the facade. The semi-recessed nature of theses balconies allows protection and shelter from wind and rain. External terraces provide private amenity space for ground floor units. Here, apartments towards Fenian Street benefit from south-facing private amenity space towards the street as well as sheltered north facing space towards the communal courtyard. The design also provides for 298sqm of communal open space.

Refer to **Figure 3.1**.

4.2.6 Access and Parking

The existing site has a small carpark with access via Kandae Lane and is located to the north of the building.

Two of the ground floor units are accessed directly from Fenian Street. The remaining ground floor unit is accessed from within the communal, gated courtyard. It is proposed that ground floor units will have their own front doors, with small south facing gardens. The entrance to upper level homes is through a gate opening off a recessed south-facing space.

The proposed development has been designed to provide facilities to encourage cycling within city. As part of the proposed development 59no. resident bike parking facilities will be provided within

permanent enclosure included as part of the building footprint to the south-west of the proposed site layout, refer to **Figure 3.1**. The number of bike storage spaces has been determined as per the Sustainable Urban Housing Design Standards (2022). Due to adequate visitor bike parking availability along the adjacent streets in the vicinity of the street, visitor car parking is not provided on site. Also, onsite car parking is not required.

4.2.7 Construction Phase

The construction phase will involve the following generic sequencing:

- Pre-construction surveys;
- Site establishment (e.g. scaffolding, hoarding, protection of adjacent structures, etc.);
- Site clearance, including demolition of existing building(s) and surfaces;
- Excavations for local foundations and drainage;
- Construction of proposed building; and
- Fit-out, landscaping and finishes.

The site is small and the extent of demolition is of a similar small-scale and typical of a proposed redevelopment site in a town centre location.

4.2.8 Mitigation Measures Proposed

While no likely significant effects on the environment have been identified (refer to Sections 4.3, 4.4 and 5.0 of this report) the following best practice mitigation measures will be adopted.

Demolition Works and Waste Management:

- A Resource Waste Management Plan (Horganlynch Consulting Engineers, 2024) for the construction and demolition phase of the proposed development, in accordance with the national and regional legislation requirements detailing the demolition method. This plan shall be implemented (and updated, as required) by the appointed contractors;
- The contractor will maintain records of all documentation for materials leaving the sites including transport and disposal licences and permits. Records for all qualifications and training of personnel carrying out the works shall also be maintained to demonstrate competency. Relevant consultations and engagements with stakeholders shall also be recorded and notices displayed at suitable locations for information as necessary. These records should be audited as part of an independently approved quality audit system.

Asbestos:

- Prior to the commencement of works, a pre-construction 'refurbishment/demolition asbestos survey' (previously called Type 3 asbestos survey) will be carried out of the existing structures on the site in order to determine the locations of asbestos-containing materials (ACMs);
- Any ACMs identified in the existing structures will be removed at an appropriate stage (e.g. prior to other deconstruction / demolition works, where there is a risk of disturbance of ACMs) by competent and suitably qualified contractors, under strictly controlled conditions, in accordance with the Health and Safety Authority (HSA) guidelines, *Asbestos-containing Materials (ACMs) in Workplaces: Practical Guidelines on ACM Management and Abatement* (2013). All ACMs must be disposed of in accordance with relevant waste legislation.

Architectural Impact:

- The proposed development has been designed to mitigate any visual impact on the existing architectural heritage in the surrounding area. The warm brick material proposed for the new building responds appropriately to the wider architectural context, including the Boyne Street housing and Post Office Garage, while also creating a backdrop against which the characteristic white colour of Archer's Garage can remain a visual focus;
- The proposed design has responded to the reconstructed 1940's Archer's Garage with a canted bay to the corner, deferring here to the existing building by allowing it to retain its primacy at the junction of Fenian Street and Sandwith Street. The design of the proposed corner tower responds to the diagonal axis created by the corner column of Archer's Garage;
- The principal impact of the proposed scheme on the surrounding historic buildings will be from the moderate increase in height between the existing structure on the site and the proposed buildings. The impact of this height is mitigated, however, by the height of recent structures in the wider surrounding context. The proposed scheme uses canted bays, a mixture of scales, a setback marking the corner and a carefully planned protected outdoor space to the rear to relieve the overall bulk of the proposed structures, with the courtyard and stepped elements to the rear responding to the smaller scale of buildings in this area.

Archaeology:

- The Archaeological Assessment (Irish Archaeological Consultancy Ltd, 2022) states that following demolition on site, it is recommended that a programme of archaeological testing be carried out within the proposed development area. This should be carried out under licence to the Department of Housing, Local Government and Heritage (DoHLGH) and in consultation with the Dublin City Archaeologist. Dependant on the results of this assessment, further mitigation may be required, such as preservation in-situ or by record and/or archaeological monitoring. Any further mitigation will require the agreement of the National Monuments Service of the DoHLGH and the Dublin City Archaeologist.

Biodiversity

- The Breeding Bird Survey report (Enviroguide Consulting, 2020) states that while the site is not considered to be of any ecological importance for birds any impacts on those present will be avoided by scheduling any hedge or tree clearance works for the non-breeding season (October – February);
- The Bat Survey Report (Ash Ecology and Environmental, 2024) states that in order to minimise disturbance to bats utilising the site in general, retain and protect the trees where possible on site. The report also suggests incorporating native trees shrub species into the landscaping scheme, to enhance the site's value for foraging and commuting bats. Species such as hawthorn, blackthorn, and elder provide valuable food sources for insects, which in turn support the local bat population.
- The Bat Survey Report (Ash Ecology and Environmental, 2024) states that the lighting should be designed to minimise light-spill onto any new planted trees which may be used by any small local bat population for foraging or commuting. This can be achieved by ensuring that the design of lighting accords with guidelines presented in the Bat Conservation Trust & Institute of Lighting Professionals recently released guidance note 8, "*Bats and Artificial Lighting at Night*" (GN08, 2023), which provides recommendations for luminaire design based on extensive

research on the potential impact of lighting on bats. The key recommendations are summarised as follows:

- Lighting should be designed to minimize light spill onto bat commuting and foraging areas;
- Light spill modelling: Ensure illuminance of <1 lux in areas of new tree planting or if any trees are retained, which meets current best practice guidelines;
- LED colour temperature: Use warm white (2700K or lower) LEDs to minimise blue light disturbance. Light sources should lack UV and peak above 550nm;
- Luminaire design: Minimise upward light ratio, glare, and light spill through optical control, recessing, and horizontal mounting (i.e., no upward tilt);
- Motion sensors and timers: Use motion sensors and short timer settings where possible to minimise lighting duration;
- Central management systems: Implement flexible remote control of lighting times using central management systems;
- Accessories: Consider using accessories like baffles or louvres to further reduce light spill, although they may be less effective than modern LED optics.

- The site of the proposed development is not of significant value for roosting bats (protected under Article 12 of the Habitats Directive) and no bat roosts will be removed as part of the proposed development. However, in the unlikely event that bats are discovered at any stage during the proposed demolition works, it is essential that all activities cease immediately, and a licenced bat ecologist is consulted for further advice.
- The Invasive Species Report (Eco Éireann Ecological Consultants, 2022), states that no species which are legally controlled under section 49 or 50 of the European Communities (Birds and Natural Habitats) Regulations 2011 are present on site. Non-native species are however present which are typical of urban sites comprising of Buddleia *Buddleja davidii* and common milkweed *Asclepias syriaca*. The appointed contractor for the works will apply working methods during site clearance and construction which avoid the risk of spreading these species off site and similarly all plant arriving on site should be subject to suitable biosecurity protocols to prevent the introduction of other non-native species on to site during the construction phase.
- The proposed landscape planting schedule shall incorporate pollinator-friendly species, with regard to the *Pollinator friendly planting code* from the *All-Ireland Pollinator Plan 2021 – 2025*;
- No invasive plant species will be used in the planting schedule.

Construction Compound:

- All plant, materials and operatives' vehicles shall be stored in dedicated compound areas within the proposed development site;
- Fuel-containing plant and machinery and hazardous substances (hydrocarbons, solvents, paints, etc.) to be stored on-site shall be kept in a secure dedicated area with mobile bunded units, drip trays and impermeable storage units. This area shall be inspected by the Site Manager on a daily basis, with prompt remedial action being taken, where required;
- Refuelling and servicing of construction machinery shall take place in a designated hardstand area which is also remote from any surface water inlets (when not possible to carry out such activities off site).

Construction Works Hours:

The proposed construction operating hours will comply with Dublin City County Council requirements.

Any deviation from these working hours will require prior consent from Dublin City County Council. Subject to the agreement of the local authority, out of hours working may be required for water main connections, foul drainage connections etc.

Construction Environmental Management Plan

A Construction Environmental Management Plan (CEMP) will be prepared, in agreement with Dublin City County Council, in advance of the commencement of the proposed works, and shall be implemented by the appointed contractor(s) throughout the proposed works in order to control the environmental effects of the construction phase, e.g. in relation to noise, vibration, dust, surface water pollution and waste management. The CEMP shall be a live document that is kept up-to-date, e.g. to reflect the publication of relevant guidelines, in order to ensure best practice in site environmental management.

4.3 Description of the Aspects of the Environment likely to be Significantly Affected

This section provides a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected. The compilation of the information in this section has had regard to the criteria set out in Schedule 7 of the PDR 2001.

A site visit was carried out at the location of the proposed development in 2022 and again in 2024, with a view to identifying any environmental sensitivities or potential pathways to same.

The site of the proposed development is situated adjacent to the existing road network, namely the Fenian Street (R815) to the south, Sandwith Street Upper to the east, Bass Place to the west and Boyne Street to the north, refer to **Figure 4.1**. The site of the proposed development is situated in a densely developed, highly urbanised area in the core of the historic city, short walk from Merrion Square and Trinity College, this small but significant corner site is at a transition point between civic/commercial buildings and established residential pockets.

The area is well served by public transport infrastructure and services, and also there is pedestrian and cyclist infrastructure in the surrounding area. The corner of the site closes a long vista from MacQuay's Bridge on the Grand Canal, along Grand Canal St and Hogan Place, an important pedestrian and vehicle route from the southern suburbs to the city centre. Pearse St. dart station is located c. 135m to the north-west of the site.

The Merrion Square Park and St. Stephens Park are located c. 175m and c. 700m to the south-west of the development, respectively and Pearse Square Park is c. 300m to the north-east of the development. Grand Canal Dock amenity area is c. 500m to the east.

The site is brownfield and is currently occupied by three-storey 14no. Dublin City Council residential block. The total area of the site is 0.12Ha. The existing 14no. residential units now unoccupied, were previously used as senior citizens apartments. The site also includes a number of parking spaces and a raised amenity area in poor condition to the north end of the site.

The proposed development site is located in a built-up area of city centre and is surrounded by residential and commercial properties. Adjacent to the site on the west, there is a derelict building with previous permission for 8-storey building, across the Bass Place street on c. 30m to the west of the site there is a recently completed seven-storey Cumberland Place offices and construction of a seven-storey

28 apartment building is on-going at the junction of Sandwith Road Upper and Boyne Street less than 50m north-east of the site. Archer's Garage architectural heritage site is located to the east of the site on the other side of Sandwith Street Upper.

This is not an industrial district. There are no SEVESO III sites within consultation distance of the site of the proposed development.

The site of the proposed development is situated in the Local Electoral Area (LEA) of 'South East Inner City' and the Electoral Division (ED) of 'Mansion House A'. The Central Statistics Office (CSO) population statistics for the location of the proposed development (at national, regional and local scales) are presented in **Table 4.1.** The CSO data illustrates that the population of the Irish State increased between 2011 and 2016 by 3.8%, and further increased by 8.1% between 2016 and 2022, bringing the total population of the Irish State to c. 5.1 million in April 2022 (see **Table 4.1**, below), which is the highest population recorded in a census since 1841. 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. The population statistics indicate that growth at the level of the ED between 2011 and 2016 was more than the growth between 2016 and 2022.

Table 4.1 Population change: State, LEA and ED level: 2011 – 2022 (CSO, 2012; 2017; 2022)

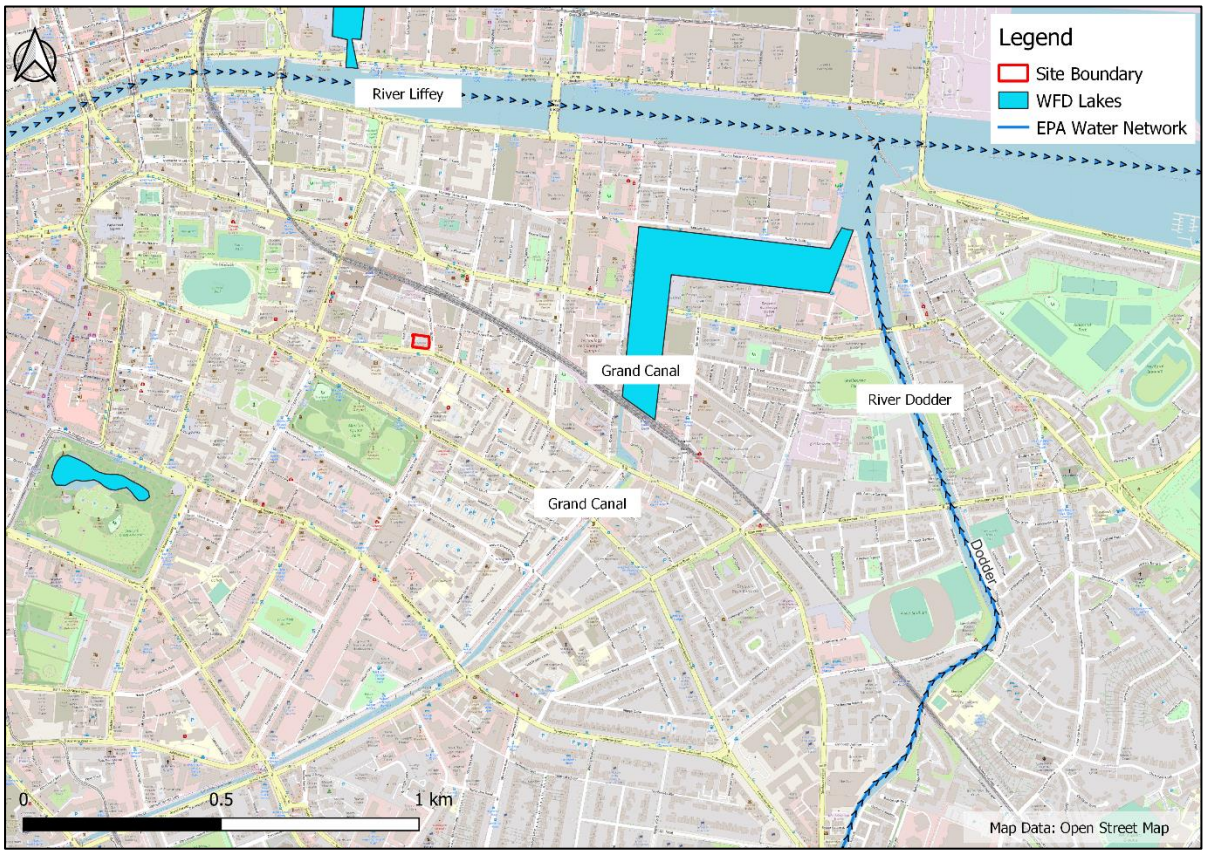
Area	Number of persons			
	2011	2016	2022	Change
Ireland (State)	4,588,252	4,761,865	5,149,139	+8.1% (2016-2022) +3.8% (2011-2016)
Dublin City Council Administrative Area	527,612	554, 554	592, 713	+6.9% (2016-2022) +5.1% (2011-2016)
Mansion House A ED	4,347	4,665	4,298	-7.86% (2016-2022) +6.8% (2011-2016)

A review of the Environmental Protection Maps (EPA) web-tool indicates that there are no surface water bodies on the proposed development site or in the immediate vicinity. The nearest watercourses are the River Liffey (EPA Code: 09L01) c. 560m to the north, River Dodder (EPA code: 09D01) c. 1.2km to the east and Grand Canal basin c. 500m to the east of the proposed development site. The site of the proposed development is situated in the 'Liffey and Dublin Bay' (09) catchment, and the 'Dodder_SC_010' (09_16) sub-catchment.

The River Liffey is tidal at this location. The subject site is located in Flood Zone B which gives a moderate risk of fluvial or coastal flooding - <0.5% (AEP) 1 in 200 year event. A justification test was carried out for the development and it concludes that it is a highly vulnerable development. For further details refer to the Engineering Report (Horganlynch Consulting Engineers, 2024).

Foul wastewater discharge from the proposed development will be treated at the Irish Water Wastewater Treatment Plant (WwTP) at Ringsend prior to discharge to Dublin Bay. The maximum design flow (6DWF) for foul drains is calculated at 0.254l/s (Horganlynch Consulting Engineers, 2024). The Ringsend WwTP operates under licence from the EPA (Licence no. D0034-01) and received planning permission (ABP Reg. Ref.: 301798) in 2019 for upgrade works, which commenced in 2018 and are expected to be fully completed by 2025. The upgrade works will result in treatment of sewage to a higher quality than current, thereby ensuring effluent discharge to Dublin Bay will comply with the Urban Wastewater Treatment Directive.

Figure 4.3 EPA waterbodies in the proximity of the proposed development



There are no European (Natura 2000) sites at or immediately adjacent to the proposed development. As detailed in the AA Screening Report (Enviroguide Consulting, 2024), submitted with the planning application under separate cover, there are 6no. European located in the potential Zone of Influence for the proposed development, as follows:

- South Dublin Bay and River Tolka Estuary SPA [004024], c. 2.23km north-west;
- South Dublin Bay SAC [000210], c. 2.23km south-east;
- North Dublin Bay SAC [000206], c. 4.47km east;
- North Bull Island SPA [004006], c. 4.77km north-east;
- North-west Irish Sea SPA [004236], c. 6.72km east
- Rockabill to Dalkey Island SAC [003000], c. 10.44km east.

The conservation objectives of these sites are to maintain the favourable conservation condition of the Qualifying Interests / Special Conservation Interests in question. Where specific conservation objectives have been set out by the NPWS, 'favourable conservation condition' is defined in respect of specific attributes and targets for the habitat or species in question. For further information, refer to the standalone AA Screening Report.

Additionally, the following nationally designated proposed Natural Heritage Areas (pNHA) are also located in the potential Zone of Influence:

- Grand Canal pNHA [002104], c. 500m east;
- Royal Canal pNHA [002103], c. 780m north-east;
- North Dublin Bay pNHA [000206], c. 2.7km north-east;
- South Dublin Bay pNHA [000210], c. 2.3km south-east;

- Dolphins, Dublin Docks pNHA [000201], c. 3.7km east;
- Booterstown Marsh pNHA [001205], c. 4.5km south-east;
- Howth Head pNHA [000202], c. 11km north-east;
- Baldoyle Bay pNHA [000199], c. 10.5km north-east;
- Dalkey Coastal Zone and Killiney Hill pNHA [001206], c. 12km south-east.

Owing to the urban context, the site of the proposed development and the majority of the surrounding areas are on hardstanding underlain by made ground. The bedrock geology in the area is of the limestone Lucan Formation, with no karst features present. The groundwater bedrock aquifer category for this area is 'locally important', with the bedrock being regarded as 'moderately productive only in local zones'. The groundwater gravel aquifer category for this area is 'locally important gravel aquifer'. The groundwater vulnerability is classed as 'low', indicating that the site is underlain by a greater than 10 m depth of moderately permeable till (GSI, 2022).

The Dublin (IE_EA_G_008) ground waterbody (GWB) underlies the site of the proposed development. The WFD ground water status of the Dublin GWB is rated as 'good' and the risk status is under 'review' (2016 – 2021 cycle).

In order to provide comprehensive baseline on the local ecological environment, biodiversity assessments were undertaken at the proposed development. These include:

- Invasive Species Report (Eco Éireann, 2022);
- Breeding Bird Survey (Enviroguide, 2020);
- Bat Survey Report (ASH, 2024);
- Tree Schedule (Charles McCorkell, 2024).

No significant habitats were recorded on the proposed development site. The proposed site comprises of existing the unoccupied houses and hardstanding at St. Andrew's Court, Block 1 (Fossitt code: **BL3** buildings and artificial surfaces). A small number of herbs and shrubs are present growing opportunistically where small borders and accumulations of earth or other growing medium are present. No species which are legally controlled under section 49 or 50 of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended) are present on site. Non-native species are however present which are typical of urban sites comprising of Buddleia and common milkweed. Other species noted on site include Bramble *Rubus fruticosus*, creeping buttercup *Ranunculus repens* and St John's wort sp *Hypericum* sp. Only four trees were noted on site including two early-mature rowan trees (*Sorbus aucuparia*), one lime tree (*Tilia* sps.) and one whitebeam tree (*Sorbus aria*).

The breeding bird survey undertaken in July 2020 identified 4no. species on site including Herring Gull, lesser-black Backed Gull, Magpie and Woodpigeon and only species proven to breed on site was Woodpigeon. The survey examined the buildings for likely nest holes for species such as Starlings and House Sparrows but none were found. There was no evidence of any other species such as Swift or House Martin using the site.

No Annex I Habitats occur within the proposed development site. No rare plants, protected species or protected habitats occur on the proposed development site. No badgers or other protected species are known to be present and no evidence of such species was recorded or in the immediate vicinity.

According to the available databases of Bat Conservation Ireland (BCI), there are previous records of bats in the wider vicinity of the proposed development site, refer to **Table 4.2**. The Bat Survey undertaken in July 2020 and again in June 2024, recorded a very low rate of bat activity and only

recordings were from Leisler's bat flying high overhead. No bats were observed emerging from any of the structures onsite and none were identified to be roosting within the proposed development site.

The NBDC databases were reviewed for the species records in the 1 km grid square overlapping with the site of the proposed development (O1633). Of these, the rare and protected species recorded in the 1 km square are listed in **Table 4.2**; while the invasive alien species recorded are listed in **Table 4.3**. It should be noted that the 1 km grid square takes in a significantly wider area than the proposed development site, and the presence of a species in the grid square is not necessarily indicative of its presence on the proposed development site.

Table 4.2 Rare and protected species recorded in 1 km grid square O1633 (NBDC, 2024)

Group	Species	Date[1]	Designation & Status[2]
Amphibians	Common Frog *(Rana temporaria)*	03/03/2003	HD, WA
Birds	Black-headed Gull (*Larus ridibundus*)	02/09/2016	WA, BoCCI red list
	Brent Goose (*Branta bernicla*)	21/02/2018	WA, BoCCI amber list
	Common Coot (*Fulica atra*)	04/01/2018	BD, WA, BoCCI amber list
	Common Starling (*Sturnus vulgaris*)	02/05/2022	WA, BoCCI amber list
	Common Wood Pigeon (*Columba palumbus*)	27/03/2023	BD, WA
	Eurasian Curlew (*Numenius arquata*)	22/12/2017	BD, WA, BoCCI red list
	Great Cormorant (*Phalacrocorax carbo*)	29/03/2023	WA, BoCCI amber list
	Greater Scaup (*Aythya marila*)	02/09/2016	BD, WA, BoCCI amber list
	Herring Gull (*Larus argentatus*)	27/03/2023	WA, BoCCI red list
	Lesser Black-backed Gull (*Larus fuscus*)	27/03/2023	WA, BoCCI amber list
	Mallard (*Anas platyrhynchos*)	02/05/2022	BD, WA
	Mute Swan (*Cygnus olor*)	04/01/2018	WA, BoCCI amber list
	Rock Pigeon (*Columba livia*)	26/01/2023	BD, WA
	Tufted Duck (*Aythya fuligula*)	23/01/2023	BD, WA, BoCCI amber list
Terrestrial Mammal	Eurasian Pygmy Shrew (*Sorex minutus)*	08/04/2015	WA
	Eurasian Red Squirrel (*Sciurus vulgaris*)	26/08/2012	WA
	Lesser Noctule (*Nyctalus leisleri*)	16/06/2008	HD, WA
	Pipistrelle (*Pipistrellus pipistrellus sensu lato*)	16/06/2008	HD, WA
	Soprano Pipistrelle (*Pipistrellus pygmaeus*)	16/06/2008	HD, WA

Table 4.3 Invasive alien species recorded in 1 km grid square O1635 (NBDC, 2024)

Group	Species	Date	Designation & Status [3]
Plants	Butterfly-bush (*Buddleja davidii)*	18/04/2023	Medium impact
	Cherry Laurel (*Prunus laurocerasus*)	04/01/2018	High impact
	Japanese Knotweed *(Fallopia japonica)*	27/08/2017	Third Schedule; high impact
Insect-Beetle (Coleoptera)	Harlequin Ladybird (*Harmonia axyridis*)	18/09/2023	Third Schedule; high impact
Terrestrial Mammal	Brown Rat (*Rattus norvegicus*)	13/07/2018	Third Schedule; high impact
	Eastern Grey Squirrel (*Sciurus carolinensis*)	23/01/2023	Third Schedule; high impact
	European Rabbit (*Oryctolagus cuniculus*)	09/01/2014	Medium impact

[1] Most recent record
[2] 'WA' = Wildlife Acts; 'HD' = Habitats Directive (Annex II, IV or V); 'BoCCI' = Birds of Conservation Concern in Ireland 2020 – 2026 (Amber- or Red-listed); 'BD' = Birds Directive (Annex I, II or III)
[3] Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477/2011)

Group	Species	Date	Designation & Status [3]
	House Mouse (*Mus musculus*)	24/08/2016	High impact

Having regard to the habitats and species present, and the relation of the site (or lack thereof) to sensitive / protected sites, the site of the proposed development is deemed to be of ***no ecological importance***, as per the criteria in the NRA 2009 *Guidelines for Assessment of Ecological Impacts of National Road Schemes*.

The Archaeological Impact Assessment (Irish Archaeological Consultancy Ltd., 2022) completed for the proposed development site states that the site is located within the Zone of Archaeological Potential for the Recorded Monument DU018-020 (Dublin City), which is subject to statutory protection. This projection refers to the historic location of the shoreline of the River Liffey Estuary and the probable medieval origins of Sandwith Street, which borders the site to the east. Historic mapping shows 17th century houses in the eastern part of the site and 18th/19th century structures in the southern part of the site. The Archaeological Impact Assessment further states that a field inspection has been carried out as part of this assessment and it confirmed the presence of a 1970s apartment block in the southern part of the site, with associated parking to the north and the access lane off Sandwith Street. No historic fabric associated with the post medieval terrace that once occupied the site was identified. No previously unrecorded sites of archaeological potential were noted and it is clear that the site has been subject to modern disturbance associated with the upstanding development.

The Architectural Heritage Impact Assessment (JCA Architects, 2022) completed for the proposed development site states that the relationship between the proposed development and Archer's Garage, a Protected Structure on the opposite corner to the site, was identified as a key constraint at the initial meeting with Dublin City Council's Conservation Department. The proposed design has responded to the reconstructed 1940's garage with a canted bay to the corner, deferring here to the existing building by allowing it to retain its primacy at the junction of Fenian Street and Sandwith Street. A small triangular public space is proposed within the site boundary at this point, it forms another element of the proposal's response to the corner created by Archer's Garage. The design of the proposed corner tower responds to the diagonal axis created by the corner column of Archer's Garage. The set-back angle of the corner tower creates a new urban space from which the unique form of Archer's Garage can be more fully appreciated.

4.4 Description of Likely Effects

This section provides a description of the likely effects of the proposed development, with reference to the above-listed environmental aspects, and under the headings of the environmental factors as specified in paragraph (b)(i)(I) to (V) of Section 171A of the PDA 2000:

- Population and human health;
- Biodiversity, with particular attention to species and habitats protected under the Habitats and Birds Directives;
- Land, soil, water, air and climate;
- Material assets, cultural heritage and the landscape; and
- The interaction between the foregoing factors.

4.4.1 Overview

The proposed development is a public residential project. The proposed development will consist of the construction of 33no. residential apartment units and associated infrastructure. As part of the proposed works, the existing three-storey residential building and associated sheds will be demolished, and the clearance of the existing site will be undertaken.

The proposed site is situated in the highly urbanised surrounds of Dublin City Centre and is not an area with a high sensitivity to the environmental effects of development of this nature and scale. The site of the proposed development predominantly comprises existing buildings and artificial surfaces. The site of the proposed development is not under any ecological designation. There are no significant ecological sensitivities in the immediate environs.

During the construction phase, typical environmental effects associated with urban construction and demolition works of this nature and scale are predicted, including elevated levels of noise, emissions of dust, direct and indirect greenhouse gas emissions, impacts on visual amenity, effects associated with construction traffic, etc. These effects will be short-term in duration, at most, and reversible. There will also be environmental risks associated with the presence of potential pollutants (e.g. hydrocarbons, solvents, cementitious materials) and human health risks associated with the presence of asbestos-containing materials and other typical site safety risks.

During the operational phase, typical environmental effects associated with the presence and operation of apartment buildings are also predicted, including water consumption, surface and foul water loading to the municipal network, additional traffic volumes and direct and indirect greenhouse gas emissions. Operational phase effects are expected to be permanent in duration.

The following sections present the results of an assessment of potential impacts, specifically with regard to the environmental factors as specified in paragraph (b)(i)(I) to (V) of Section 171A of the PDA 2000, identifying in each case, the types and characteristics of potential impacts.

4.4.2 Population & Human Health

As stated above, the construction phase of the proposed development may be expected to give rise to typical environmental effects associated with urban construction activities of this nature and scale, including generation of dust, noise and vibration, effects associated with construction traffic, and negative impacts on visual amenity.

The proposed development site is situated in the dense area of Dublin City Centre. It is surrounded on all sides by existing residential and commercial development that may be affected by the environmental aspects of the proposed demolition and construction works. All such effects are predicted to be localised, short-term in duration and reversible. Nevertheless, best practice measures will be implemented during the proposed works (as detailed in Section 4.2.8, above), in order to avoid and minimise impacts on local residents insofar as possible.

As the existing dwellings at St. Andrew Court were constructed during the 19th Century, there is a risk of encountering asbestos containing materials (ACMs) during demolition works. Asbestos is a Category 1 carcinogen, and the presence of ACMs would, therefore, pose a health risk to construction site personnel, and potentially to residents and passers-by in immediate environs. In order to rule out the likelihood of significant human health impacts associated with the potential presence of ACMs, a pre-construction refurbishment/demolition asbestos survey will be carried out, and any ACMs

identified will be removed by suitably qualified contractors, under strictly controlled conditions, in accordance with the HSA guidelines (refer to mitigation measures in Section 4.2.8).

The proposed development will replace the existing 14no. poor quality residential dwellings with 33no. modern residential apartments, open space, parking and associated infrastructure. The proposed development presents a positive opportunity to provide additional residential units in a strategic location, utilising existing services and infrastructure, and providing sustainable places to live, close to work and public transport link.

As mentioned in Section 4.2.5, at ground floor, apartments occupy the full depth of the building towards Fenian Street and Sandwith Street, creating dual aspect homes. At Level 01 and above, all units benefit from fenestration towards the external access decks as well as fenestration and private balconies towards Fenian Street, Sandwith Street and the laneway to the north of the site, thus ensuring every home in the scheme is dual aspect.

Two of the ground floor units are accessed directly from Fenian Street. The remaining ground floor unit is accessed from within the communal, gated courtyard. Within the courtyard, two lifts and a stairway led to external walkways at upper levels which provide access to the remaining units. There are two points of entry to the communal courtyard. First is the main entrance from Fenian Street which marks the transition from the civic domain of the Street to the private residents' courtyard. The second entrance is from the lane to the north of the site where a gate leads to a gently sloped approach into the courtyard.

Each home is designed to be simple and functional with the primary aim of enhancing the everyday life of each resident. External access decks allow greater space provision and maximise dual aspect. This ensures each home benefits from enhanced access to direct daylight.

DCC required 5% of units to achieve a "*Universal Design* +" standard as described in the Universal Design Guidelines for Homes in Ireland document. The scheme provides 3no. UD+ compliant apartments (9% of the total provided), each of which are located at ground floor with level access from the street and to the communal courtyard.

All apartments have generous private amenity space provided in form of terrace or balcony. A courtyard is also proposed which will be a landscaped area with child play area and planted areas for residents. The roof-garden on Level 04 will further provide for a shared garden space for the residents.

Also, given the site's proximity to a variety of retail, educational, recreational, and healthcare facilities located close-by and to Public Transport, the development of the site for social housing would contribute to the creation of sustainable mixed communities in accordance with national and local statutory planning policy.

Hence, no likely significant effects are predicted in relation to population and human health.

4.4.3 Biodiversity[4]

There are no European sites within the immediate vicinity of the proposed development site at St. Andrew's Court.

[4] With particular attention to species and habitats protected under the Habitats and the Birds Directives

Overall the development site has *no ecological importance* as defined by the ecological resource valuations presented in the NRA Guidelines. The site, is made up of, mainly existing residential dwellings. The construction phase of the proposed development will involve extensive demolition and site clearance works that will result in the removal of all existing habitats on the site. The loss of these features will not constitute a significant ecological impact. The proposed landscape design will increase the quantum of vegetation on the site. It will incorporate planting of trees that may be expected to offset the aforementioned losses.

There are no mature trees with bat potential on the site, and the existing buildings are of no more than low suitability for roosting bats. The site is entirely unsuited to use by badgers, otters (protected under Article 12 of the Habitats Directive).

The demolition of buildings will be carried out outside of the bird nesting season (1 March – 31 August, inclusive) unless where strictly necessary – in which case, a survey for nesting birds will be carried out to ensure no impacts on breeding birds (refer to Section 4.2.8).

Biosecurity measures implemented during the proposed works will prevent the introduction of invasive species. To avoid the introduction of invasive species any material imported to the site should be screened for invasive species and all machinery should be thoroughly cleaned down prior to arriving on site. Refer to Section 4.2.8.

The construction phase of the proposed development will result in typical construction phase effects such as elevated noise levels and lighting that could potentially result in disturbance of wildlife in the surrounding environment. However, considering the high urbanised and disturbed context at present, the proposed works are only expected to result in marginal change in this regard – with no significant ecological impacts likely to occur.

The AA Screening Report (Enviroguide Consulting, 2024) for the proposed development, submitted as part of the planning application under separate cover, has arrived at the following conclusion:

> *'On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available and objective information, that the possibility of any significant effects on the above listed European sites, whether arising from the project itself or in combination with other plans and projects, can be excluded in light of the above listed European sites' conservation objectives. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of a NIS is not required.'*

Therefore, for the purposes of this EIA screening determination, significant effects on European sites can also be excluded. This conclusion has been arrived at having consideration of the nature, scale and location of the proposed development, and the potential for significant effects on the Qualifying Interests of the above-listed European sites, with regard to their conservation objectives, and in accordance with the source-pathway-receptor model for impact assessment. For further detail, please refer to the separate AA Screening Report.

No likely significant effects are predicted in relation to biodiversity, including to species and habitats protected under the Habitats and Birds Directives.

4.4.4 Land, Soil, Water, Air & Climate

The site of the proposed development is situated on a previously built site, dominated by buildings and hardstanding.

There are no watercourses on the site of the proposed development or in the immediate vicinity, and it is not feasible that pollutants could be directly discharged from the site of the proposed development to the surface water network. The proposed development includes a comprehensive surface water drainage infrastructure through which the rate of discharge of surface water will be carefully controlled.

During the construction phase, standard good practice pollution control measures will be implemented, preventing the emissions of pollutants to the municipal drainage network. During its operation, the proposed development will feature segregated foul and surface water drainage networks. However, both systems will discharge to the existing Irish Water combined sewers underlying the adjacent roads.

The proposed development is not expected to increase flood risk on the site or elsewhere. On the contrary, the inclusion of on-site surface water attenuation measures and soft landscaping may be expected to attenuate surface water run-off and, therefore, reduce overall flood risk.

The Engineering Report (Horganlynch Consulting Engineers, 2024) has been submitted as part of this application. The assessment identifies that the River Liffey is tidal at this location. The subject site is located in Flood Zone B which gives a moderate risk of fluvial or coastal flooding - <0.5% (AEP) 1 in 200-year event. The area of the development is in a moderate flood risk zone and the report is satisfied that the site development verifies the justification test requirements set out in the relevant planning guidelines.

Groundworks are likely to be required e.g. to facilitate the construction of foundations and drainage services and it may be required to export a certain volume of excavated material for off-site disposal (in accordance with the applicable legislation). Significant impacts on land, soil or groundwater are not likely to occur as a result of these works, which will be carried out in accordance with best practice measures.

In relation to air quality, minor emissions of dust may be expected to occur during the proposed works. Dust management measures will be implemented under the scope of the CEMP. No significant impacts are anticipated in this regard.

The detailed design of the proposed development will ensure compliance with requirements expressed in relevant parts of the Sustainable Urban Housing: Design Standards for New Apartments. Due to the proposed dual aspect, therefore will benefit from more space with access to direct daylight and natural ventilation. The proposal has been designed to be climate-friendly with provision of green roofs and SUDs drainage throughout.

The proposed provision of generous on-site bicycle parking and no on-site car parking, is consistent with national and municipal objectives to promote a modal shift away from private car use in favour of low-carbon and active alternatives.

No likely significant effects are predicted in relation to land, soil, water, air or climate.

4.4.5 Material Assets, Cultural Heritage & the Landscape

The proposed development is not expected to give rise to any significant effects in relation to material assets, i.e. roads or other built services / infrastructure. As discussed in Section 4.2.6, two of the ground floor units are accessed directly from Fenian Street. The remaining ground floor unit is accessed from within the communal, gated courtyard. It is proposed that ground floor units will have their own front doors, with small south facing gardens. The entrance to upper level homes is through a gate opening off a recessed south-facing space.

During construction, the proposed development has the potential for significant (both temporary and permanent) negative effects on major public utilities due to the requirement to divert or modify existing infrastructure. During the operational phase, the proposed development is unlikely to have a significant effect on material assets such as major public utilities.

The Archaeological Assessment (Irish Archaeological Consultancy Ltd, 2022) states that the proposed development area is located within the Zone of Archaeological Potential for the Recorded Monument RMP DU018-020 and is bounded by a road network that was likely to have been established during the medieval period. Historic mapping shows 17th century houses in the eastern part of the site and 18th/19th century structures in the southern part of the site. Whilst the site has been subject to modern development, it is not clear how that development may have affected the potential archaeological resource. As such it is possible that ground disturbances associated with the redevelopment of the site will have an adverse impact on the potential archaeological resource.

Following demolition on site, it is recommended that a programme of archaeological testing be carried out within the proposed development area. This should be carried out under licence to the DoHLGH and in consultation with the Dublin City Archaeologist. Dependant on the results of this assessment, further mitigation may be required, such as preservation in-situ or by record and/or archaeological monitoring. Any further mitigation will require the agreement of the National Monuments Service of the DoHLGH and the Dublin City Archaeologist.

The Architectural Heritage Impact Assessment (JCA Architects, 2022), that all impacts are solely visual, with no physical impacts on the surrounding historic buildings. The relationship between the proposed development and Archer's Garage, a Protected Structure on the opposite corner to the site, was identified as a key constraint at the initial meeting with DCC's Conservation Department. The proposed design has responded to the reconstructed 1940's garage with a canted bay to the corner, deferring here to the existing building by allowing it to retain its primacy at the junction of Fenian Street and Sandwith Street. A small triangular public space is proposed within the site boundary at this point, it forms another element of the proposal's response to the corner created by Archer's Garage. The design of the proposed corner tower responds to the diagonal axis created by the corner column of Archer's Garage. The setback angle of the corner tower creates a new urban space from which the unique form of Archer's Garage can be more fully appreciated.

Post mitigation measures listed in Section 4.2.8, impacts on architectural or archaeological heritage are not expected to occur.

There is the potential for temporary significant negative townscape and visual effects during construction due to general construction activity, impacts on property boundaries, traffic diversions and streetscape disturbance. Indirect impacts include the visible and landscape impact of construction activities and hoarding, changes to traffic patterns and diversions and the increased movement of HGV.

The building ranges in height from 1 to 7-stories, with communal roof garden located on roof of one of the 4-storey blocks. In order to maximise the site density while permitting protected outdoor spaces, the seven-storey elements respond to the newly established scale along Fenian Street, while on Sandwith Street, the proposed height steps down to four stories in response to the granted planning permission for 4-storey building to replace the existing 2-storey building.

During the operational phase, the proposed development may alter visual amenity due to the new features within the streetscape, changes in traffic flows, lighting, signage, new boundaries and

landscape planting treatments. There is also the potential for permanent significant positive effects on public realm through proposed changes to the streetscape.

No likely significant effects are predicted in relation to material assets, cultural heritage or the landscape.

4.4.6 Interactions

The key interactions may be summarised as follows:

- Negative water quality effects have the potential to negatively affect aquatic ecology;
- Negative effects in relation to noise, air quality, traffic and material assets have the potential to negatively affect population and human health.

Interactions between environmental topics have been comprehensively addressed herein.

No likely significant effects are predicted in relation to the interaction between environmental topics.

4.4.7 Indirect and/or secondary effects

Indirect and/or secondary effects could arise as a result of the proposed project due to a complex pathway. There is potential for greenhouse gas emissions due to the indirect construction and operational phase traffic impacts of the proposed development. There is also potential for indirect impacts on water bodies downstream during site clearance and construction activities. Furthermore site activities during the construction phase have the potential to result in water pollution and have indirect effects such as deterioration of habitat quality on the flora and fauna that are within the catchment of the affected waterbodies.

However, with the scale and nature of the proposed works do no result in likely significant indirect and/or significant effects.

4.4.8 Cumulative Impacts

The following sources were consulted to identify relevant other plans or projects:

- Dublin City Development Plan 2022-2028 (DCC, 2022);
- The National Planning Application database (www.myplan.ie - accessed July 2024);
- An Board Pleanála database (www.pleanala.ie - accessed July 2024); and
- EIA Portal (www.housinggovie.maps.arcgis.com - accessed July 2024).

No developments are proposed within the immediate vicinity of the site that would, in combination with the development under appraisal in this report, give rise to significant effects. This includes projects that are currently under construction, have recently been granted planning permission or are awaiting a decision, such as:

- 3164/23, 62-64, Fenian Street, Nos. 2, 3, 4, 9 & 10 Bass Place and Nos. 1-3 Sandwith Street Upper, Dublin 2: Decision was granted for Development on a site (site area 0.1834 ha). The development will consist of: - The construction of 87 apartments (7,795.2 sq.m total residential gross floor area) comprising of 38 no. 1-bed units, 41 no. 2-bedroom units and 8 no. 3-bed units; café and a gym/ yoga studio in 3 blocks. The proposed development, with a total gross floor area (GFA) of 8,041 sq.m is described below on a block-by-block basis: - Block 1 (7,109 sq.m total GFA): 79 apartments (7,059.20 sq.m total residential GFA) comprising 35 no. 1-bed units, 38 no. 2-bedroom units and 6 no. 3-bed units in a block ranging from 8-10 storeys over

basement, all with private amenity space in the form of terraces/ balconies, together with a café (49.8 sq.m total GFA) at ground level. Communal Amenity space is provided on rooftop terraces. Car parking (20 spaces), motorbike (2 spaces) and cycle parking (142 spaces) is provided in the basement of Block 1, with access via Bass Place. -Block 2 gym/ yoga studio (196 sq.m total GFA) in 3 storey block fronting Bass Place. -Block 3 (736 sq.m GFA): 8 residential apartments including 3 no. 1-bed units, 3 no. 2-bed units and 2 no. 3-bed units, all with private amenity space in the form of terraces/ balconies in a block ranging from 3-4 storeys. Block 3 is proposed at Nos. 1-3 Sandwith Street Upper and includes the demolition of part of the existing 2-storey vacant terraced houses. The front facade onto Sandwith Street Upper and the southern facade onto the adjoining laneway will be retained, with modifications to the window and door openings, and an additional 1-2 storeys added over. 10 long-stay secure cycle parking spaces are provided at ground floor level. A total of 20 car parking spaces, 2 motorbike spaces and 198 cycle parking spaces (comprising 142 long stay spaces in basement of Block 1; 10 long-stay spaces in Block 3; with 44 short-stay spaces and 2 cargo bike spaces in the public realm) is provided on site. Permission is also sought for the demolition of all existing buildings on site (2,104 sq.m total GFA) including two-storey over basement commercial building at 62-64 Fenian Street, 5 terraced houses at Nos. 2,3,4, 9 and 10 Bass Place, and Nos.1-3 Sandwith Street Upper (excluding the existing front facade onto Sandwith Street Upper and south facade onto the adjoining lane which are retained) associated sheds and surface car park to the rear of these properties; landscaping, public and communal amenity space (comprising of rooftop terraces and at grade), and all associated site and development works.

- 3861/24 62-64, Fenian Street, Nos. 2,3,4,9,10 & 11 Bass Place and, Nos. 1-3 Sandwith Street Upper, Dublin 2: A decision is awaited for the application submitted for a revision to the previously granted reg. ref. 3164/23, including. Extending the application site from c.0.183ha to c. 0.190 ha, which now includes for the demolition of 11 Bass place an end of terrace 2 Storey house in addition to those previously granted permission for demolition and replacing the previously granted 3 storey, Block 2 aspect, which incorporated a gym / yoga studio, with a larger footprint 3 storey residential block providing 8 one bed apartments with balconies facing north west, west and south, and a ground floor garden / balcony to the east. Accordingly, omission of Condition 5 referring to the yoga / gym use of this block is also sought. Modifications are sought to the ground, basement, 6th floor and roof terrace of Block 1 to include the relocation of the bin store serving all blocks to the basement / lower ground (19.5sqm) together with a new backup generator room (20sqm) for the life safety systems, provision at ground floor of a gym facility facing Bass Place and a coffee / retail outlet to the south west corner facing Fenian Street, provision of an additional one bedroom apartment at ground floor facing Bass Place with a western facing balcony and relocation of the ESB Substation & switch room from the western façade at Bass Place to the eastern façade laneway, including minor layout alterations to the previously granted one bedroom ground floor apartment and eastern facing balcony on the eastern façade. Proposed minor increase to the 6th floor area (additional 12sqm) to facilitate provision of a 3 bedroom and 1 bedroom apartment in the area previously proposing two 2 bedroom apartments. Accordingly the omission of condition 4 is also sought. Minor revision to the roof terrace of Block 1 to include a cold water storage tank and ancillary plant. Modifications and minor extension at ground (7.65sqm) first floor (5.4sqm) & second floor (2.5sqm) to Block 3 together with replacement of the ground floor Bin and Bicycle store with a new 1 bedroom apartment with a south facing

balcony. A new total of 82 apartments is proposed, consisting of 65 units in Block 1 (consisting of 27 one bedroom, 37 two bedroom & 1 three bedroom units) 8 one bedroom apartments in Block 2 and 9 apartments in Block 3 (consisting of 4 one bedroom, 3 two bedroom & 2 three bedroom units). Together with minor modifications to the public and communal open space areas.

- ABP 313738, Grand Canal Dock Basin and Grand Canal Quay to Sir John Rogerson's Quay, Dublin 2: Permission has been granted in November 2023 on the proposed Grand Canal Storm Water Outfall Extension comprising the construction of pipework, transition chambers, floating platforms and new outfall structure to the River Liffey, including all ancillary site works;
- ABP 317679, Ringsend to City Centre Core Bus Corridor Scheme: Decision is awaited from the Bord on the proposed bus corridor scheme from Ringsend to City Centre. The Proposed Scheme has an overall length of approximately 4.3km (2 x 1.6km along the River Liffey Quays and 1.1km of cycle route through Ringsend and Irishtown to Sean Moore Road) and is routed along the north and south quays River Liffey, linking the city centre with the Docklands and an onward cycling connection to Ringsend and Irishtown, all within the County of Dublin and within the Dublin City Council (DCC) administrative area. The Proposed Scheme will involve works on existing streets, the relocation of both pairs of Scherzer Bridges along the north quays and the provision of a new opening bridge across the River Dodder (i.e., the Dodder Public Transport Opening Bridge (DPTOB)) will create a new pedestrian, cycle and public transport connection between Sir John Rogerson's Quay and East Link Road by way of segregated cycling facilities and bus priority infrastructure. A continuation of the two-way cycle route on the south quays will extent through Ringsend and Irishtown towards Sandymount Strand and the Poolbeg peninsula. The route will run via quiet streets at Pembroke Cottages, across Cambridge Road, then through Ringsend Park as a shared path with pedestrian priority, and a cycle track along the northern side of Strand Street and Pembroke Street in Irishtown to the junction of Sean Moore Road and Beach Road. A spur cycle route will be provided towards the Poolbeg Strategic Development Zone (SDZ) lands via Irishtown Stadium and Bremen Road. Shared use symbols will also be installed along York Road and Pigeon House Road to provide a second alternative route towards the Poolbeg SDZ lands. This road has recently been closed to through traffic and is suitable for shared use.
- ABP 314724, Metrolink. Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin: Decision is awaited from the Bord on the proposed railway order application for the Metrolink. The development includes a 9.4km section of single bore tunnel running beneath Dublin city centre from Northwood Station to Charlemont Station and a 2.3km section of single bore tunnel running beneath Dublin Airport. Tunnel sections include intervention access facilities for emergency services at Dublin Airport, Albert College Park and just south of Charlemont Station. Tunnel portal structures will be provided at Northwood, Dardistown and Dublin Airport. North of Dublin Airport the alignment will emerge from tunnel and will run at surface level, in cut and cover and on elevated structures to Estuary Station. A new 99m long bridge will be constructed over the M50 Motorway and a 261m long multi-span Viaduct over the Broadmeadow and Ward Rivers. 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; Four retained cut stations at Seatown, Swords Central, Fosterstown and Dardistown; and One at grade station at Estuary. A multi-storey 3000 space Park & Ride (P&R) close to the M1 Motorway will be

provided at Estuary Station. A maintenance depot is proposed at Dardistown (alongside the station) which will house all the facilities required for the maintenance and operation of MetroLink, 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 and other electricity infrastructure to power MetroLink; establishment of 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 delivery.

It is noted that the list of developments in this section 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.

Considering the nature and scale of the proposed development, the localised and insignificant nature of the environmental effects predicted to occur as a result of the proposed development, and the nature of existing, permitted and proposed development in its environs, it is considered that significant in combination effects on European sites are not likely to occur.

Furthermore, the zoning, policies and objectives set out in the *Dublin City Development Plan 2022 – 2028* are intended to protect the environment while encouraging development in appropriate areas. It is considered that the proposed development and the above-listed permitted / proposed developments in the vicinity are consistent with the Development Plan's objectives for development in the area, which have themselves been subject to Strategic Environmental Assessment and Appropriate Assessment.

The proposed development will not impact on the flow of water through the area, nor increase potential flood impacts. It is in compliance with all of the relevant Plan objectives.

A number of other plans were considered when assessing in-combination effects, but it was determined that there would be no in-combination effects with these:

- The National Planning Framework (Project Ireland 2040);
- The Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019 – 2031 (The Eastern and Midland Regional Assembly);
- The Greater Dublin Strategic Drainage Study;
- Greater Dublin Area Transport Strategy 2022-2042;
- Climate Action Plan 2024;
- National Biodiversity Action Plan 2023 – 2030.

It is considered that significant in-combination effects on European sites are not likely to occur as a result of the proposed development in combination with other plans or projects.

As concluded in the Appropriate Assessment (AA) Screening Report (Enviroguide Consulting, 2022), the proposed development, individually or in combination with another plan or project, will not have a significant effect on any European sites.

4.5 Schedule 7 Criteria

Schedule 7A of the PDR 2001 requires the Applicant to have regard to the criteria set out in Schedule 7 of the PDR 2001. These criteria have been considered as set out in **Table 4.4**.

Table 4.4 Criteria set out in Schedule 7 of the PDR 2001 and corresponding information in respect of the proposed development

Criteria	Information in respect of the proposed development
1. Characteristics of proposed development *The characteristics of proposed development, in particular—*	
(a) the size and design of the whole of the proposed development,	The proposed development comprises 33no. social housing units on a site of c. 0.12 Ha. The size and design of the proposed development are detailed in **Section 3.1 and Section 4.2**, above.
(b) cumulation with other existing development and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the [PDA 2000] and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment,	As per **Section 4.4.7** above, it is considered that significant in-combination effects on European sites are not likely to occur as a result of the proposed development in combination with other plans or projects.
(c) the nature of any associated demolition works,	As part of the proposed works, the existing 14no. residential dwellings will be demolished. The proposed demolition works are detailed in **Section 3.1** and **Section 4.2.8**, above.
(d) the use of natural resources, in particular land, soil, water and biodiversity,	The site of the proposed development in Dublin City Centre is dominated by buildings and hardstanding, with limited pockets of landscaping. This is not a greenfield site. Therefore, there will no new consumption of 'land' required to facilitate the build. Local excavations for foundations and services are envisaged, and it may be necessary to export excavated material for off-site disposal. This will be executed in accordance with the relevant legislative provisions. During the operational phase, potable water from the municipal supply network will be consumed by residents. In this regard, the proposed development is not expected to be significantly different to the previous operational scenario. The site of the proposed development contains areas of hardstanding of limited biodiversity value. The proposed works will result in the removal of all existing habitats on the site. The loss of these features will not constitute a significant ecological impact. There are no unusual aspects of the proposed development in this regard. Use of natural resources will be limited to standard / typical levels for development of this nature, scale and location.
(e) the production of waste,	During the construction phase, waste material will be generated, requiring off-site disposal. Waste materials are

Criteria	Information in respect of the proposed development
	likely to include demolition waste and excavated material. Waste material will be managed in accordance with the applicable legislative provisions. As detailed in **Section 4.2.8**, a Resource Waste Management Plan has been prepared by (Horganlynch Consulting Engineers, 2024) for the construction and demolition phase of the proposed development, in accordance with the national and regional legislation requirements detailing the demolition method. This plan shall be implemented (and updated, as required) by the appointed contractors. Additionally, the demolition of the existing buildings on the site will be executed, insofar as practicable, as a controlled deconstruction, in order to minimise the volume of waste generated. During the operational phase, municipal solid waste will be generated by residents. The proposed development incorporates centralised, secure bin stores with a three-bin system, allowing for the segregation and secure storage of household waste, to be collected, recycled or disposed of in accordance with the applicable legislative provisions. There are no unusual aspects of the proposed development in this regard. Volumes of waste generated during the demolition, construction and operational phases will be commensurate of development of this nature, scale and location.
(f) pollution and nuisances,	As detailed above, during the construction phase, there will be typical construction and demolition-related pollution risks and effects, e.g. generation of dust, elevated levels of noise, potential pollution risk associated with presence of hazardous substances (hydrocarbons, cementitious material, etc.). Standard good practice construction pollution control measures will be implemented (as detailed in **Section 4.2.8**), and no significant environmental effects are predicted in this regard. Works will be limited to normal working hours in order to avoid / minimise potential nuisance. During the operational phase, potential sources of pollution associated with the proposed development are principally (i) generation of municipal solid waste (addressed above) and (ii) generation of foul water. As detailed above, foul water will be discharged to the municipal wastewater drainage network, which contains overflow arrangements and which conveys wastewater to Ringsend WwTP for treatment prior to discharge at Dublin Bay. For the reasons detailed, no significant environmental effects are predicted in this regard.

Criteria	Information in respect of the proposed development
(g) the risk of major accidents, and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge, and	The proposed development is neither especially susceptible to the risk of major accidents and / or disasters, nor is it likely to cause or exacerbate such an event. No particular risks have been identified in this regard. There are no Seveso sites in the vicinity of the proposed development, and no consultation distance for any such site overlaps with the proposed development. As detailed in **Section 4.3**, above, the River Liffey is tidal at this location and the site is located in Flood Zone B which gives a moderate risk of fluvial or coastal flooding - <0.5% (AEP) 1in200 year event. The nearest reported historic flood events from the OPW National Flood Hazard map occurred in Fenian Street in 1963 which is at the site location. For further details refer to the Engineering Report (Horganlynch Consulting Engineers, 2022).
(h) the risks to human health (for example, due to water contamination or air pollution).	The potential impacts of the proposed development in relation to human health have been assessed above (refer to **Section 4.4.2**, above). The site of the proposed development is situated in a densely populated urban area, with numerous residential receptors present in the immediate vicinity. However, having regard to the nature and scale of the proposed development, no likely significant effects are predicted in this regard. A range of best practice mitigation measures will be implemented (refer to **Section 4.2.8**) in order to avoid / minimise impacts on the local population insofar as possible.
2. Location of proposed development *The environmental sensitivity of geographical areas likely to be affected by the proposed development, with particular regard to—*	
(a) the existing and approved land use,	The development site consists of 14no. existing dwellings at St. Andrew's Court, on the corner of Fenian Street and Sandwith Street Upper, Dublin 2. The proposed site has historic residential use and as per the *Dublin City Development Plan 2022-2028* is zoned Zone 1: Sustainable Residential Neighbourhoods - *To protect, provide and improve residential amenities* (refer to **Figure 4.2**). Lands to the immediate west and north and to south-east are under similar zoning. Residential neighbourhood (conservation areas) (Zone 2 zoning) lie along Boyne Street further north. The majority of lands to the east of the site – east Sandwith Street Upper, including Archer's Garage – are zoned Zone 5: City Centre - *To consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity*. Lands to the south of the site – south of Fenian Street are zoned Zone 4: Key Urban Villages / Urban Villages - *To provide for and improved mixed-services facilities*.

Criteria	Information in respect of the proposed development
	For further details in relation to existing and approved land use, refer to **Section 4.2**, above.
(b) *the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground,*	The site of the proposed development is a previously developed site, dominated by existing buildings and hardstanding (i.e. artificial surfaces) and underlain by made ground. Overall the development site has no ecological importance as defined by the ecological resource valuations presented in the NRA Guidelines. There are no protected habitats or rare / protected species of flora present on the site. There are no surface water bodies or designated sites on the site or in the immediate vicinity. For further details, refer to **Sections 4.3** and **4.4.3**, above. The site of the proposed development and wider area is densely developed and urban in nature, having low sensitivity to the effects of development, and a relatively high regenerative capacity (given the absence of sensitive habitats).
(c) *the absorption capacity of the natural environment, paying particular attention to the following areas:*	
a. *wetlands, riparian areas, river mouths;*	There are no wetlands, riparian areas or river mouths at the site of the proposed development or in the immediate vicinity that could be directly affected by the proposed development. At closest, Sandymount Strand/ Tolka Estuary Ramsar site (832) is located c. 3km to the east of the site. Indirect hydrological connections, e.g. via the wastewater drainage and treatment system, are detailed in **Section 4.4.4**, above.
b. *coastal zones and the marine environment;*	The site of the proposed development is situated a c. 4.5 km linear distance from the coast. There are no direct impact pathways between the proposed development site and coastal zones or the marine environment. Indirect hydrological connections, e.g. via the wastewater drainage and treatment system, are detailed in **Section 4.4.4**, above.
c. *mountain and forest areas;*	There are no mountains or forest areas at the proposed development site or in the immediate vicinity that could be affected.
d. *nature reserves and parks;*	The nearest statutory Nature Reserve to the proposed development site is at North Bull Island, c. 5.2km to the north-east. There are a number of parks in the vicinity, Merrion Square Park and St. Stephens Park are located c. 175m and c. 700m to the south-west of the development, respectively and Pearse Square Park is c. 300m to the north-east of the development. There is no real likelihood of significant effects on any Nature Reserve or park resulting from the proposed development.
e. *areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive and;*	An Appropriate Assessment (AA) Screening Report has been prepared by Enviroguide Consulting (2024) in respect of the proposed development (refer to document submitted under separate cover). It has concluded that - '*On the basis of the screening exercise carried out above, it can be concluded, on*

Criteria	Information in respect of the proposed development
	the basis of the best scientific knowledge available and objective information, that the possibility of any significant effects on the above listed European sites, whether arising from the project itself or in combination with other plans and projects, can be excluded in light of the above listed European sites' conservation objectives. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of a NIS is not required.' This assessment was reached without considering or taking into account mitigation measures or measures intended to avoid or reduce any impact on European sites. For details, refer to the AA Screening Report, submitted under separate cover. Refer also to **Sections 4.3** and **4.4.3**, above.
f. areas in which there has already been a failure to meet the environmental quality standards laid down in legislation of the European Union and relevant to the project, or in which it is considered that there is such a failure;	There are no such areas connected to the site that could be significantly affected by the proposed development.
g. densely populated areas;	As discussed above (refer to **Sections 4.3** and **4.4.2**), the proposed development is situated in densely populated Dublin City Centre, and there are numerous residential receptors in the immediate area that could be affected by the environmental aspects of the proposed development. However, having regard to the nature and scale of the proposed development, it is considered that there is no real likelihood of significant effects in this regard. A schedule of good practice mitigation measures, has been proposed, in order to avoid / minimise impacts on the local population insofar as possible.
h. landscapes and sites of historical, cultural or archaeological significance.	The proposed site is located within the Zone of Archaeological Potential for the Recorded Monument DU018-020 (Dublin City), which is subject to statutory protection. A field inspection has been carried out as part of this assessment. This confirmed the presence of a 1970s apartment block in the southern part of the site, with associated parking to the north and the access lane off Sandwith Street. No historic fabric associated with the post medieval terrace that once occupied the site was identified. No previously unrecorded sites of archaeological potential were noted and it is clear that the site has been subject to modern disturbance associated with the upstanding development. Refer also to **Sections 4.3, 4.4.5 and 4.2.8**, above.
3. Types and characteristics of potential impacts	

Criteria	Information in respect of the proposed development
The likely significant effects on the environment of proposed development in relation to criteria set out under paragraphs 1 and 2, with regard to the impact of the project on the factors specified in paragraph (b)(i)(I) to (V) of the definition of 'environmental impact assessment report' in section 171A of the [PDA 2000], taking into account—	
(a) the magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected),	Regard has been had, in the preparation of this report, to the likely magnitude and spatial extent of impacts arising from the proposed development during the construction and operational phases. The likely impacts of the proposed development will not be unusual in these respects. The spatial extent of the direct impacts of the proposed development (e.g. habitat loss, dust generation, elevated noise, etc.) will be limited to the site and / or the immediate environs (i.e. typically within 50 m). This is a densely populated area, with numerous residential receptors in the immediate area. Additionally, as detailed above, there is the potential for indirect impacts further afield, e.g. due to the generation of greenhouse gas emissions, waste materials, wastewater and surface water. This is a small sized development that, during the operational phase, will entail only a marginal change, in terms of environmental aspects and impacts, relative to the baseline.
(b) the nature of the impact,	Regard has been had, in the preparation of this report, to the likely nature of impacts arising from the proposed development during the construction and operational phases. The likely impacts of the proposed development will not be unusual in this respect.
(c) the transboundary nature of the impact,	The site of the proposed development is not proximate to any boundaries of relevance (e.g. Local Authority administrative areas, County boundaries or the boundary with Northern Ireland), and no transboundary impacts are likely to arise.
(d) the intensity and complexity of the impact,	Regard has been had, in the preparation of this report, to the likely intensity and complexity of impacts arising from the proposed development during the construction and operational phases. No impacts of unusual intensity or complexity are likely to arise.
(e) the probability of the impact,	In accordance with the EPA (2022) criteria, regard has been had to the probability of impacts arising from the proposed development.
(f) the expected onset, duration, frequency and reversibility of the impact,	In accordance with the EPA (2022) criteria, regard has been had to the likely onset, duration, frequency and reversibility of impacts arising from the proposed development. Generally speaking, construction phase impacts are predicted to be short-term in duration (lasting as long as the proposed works)

Criteria	Information in respect of the proposed development
	and reversible; while effects of the operational phase are assumed to be permanent in duration.
(g) the cumulation of the impact with the impact of other existing and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the [PDA 2000] and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment, and	Cumulative impacts addressed above in **Section 4.4.7** relation to paragraph 1(b). No likely significant cumulative impacts are predicted to occur.
(h) the possibility of effectively reducing the impact.	A schedule of mitigation measures is proposed in order to avoid / minimise potential environmental impacts, where appropriate. Refer to **Section 4.2.8.**

5 Conclusion

It is considered that the proposed development would not be likely to have significant negative effects on the environment. The main reasons for this conclusion are as follows:

- The size of the site and the scale of the proposed development are of a small scale and significantly below the stated thresholds of Part 2 of Schedule 5 of the Planning and Development Regulations 2001 (as amended) at or above which there is a mandatory requirement for EIA;
- The nature of the proposed construction works and of the proposed development itself are not unusual in the context of the receiving environment. The construction phase of the proposed development is expected to give rise to minor, localised environmental effects that are typical of urban construction projects of this nature;
- The residential development is to be located on lands zoned for residential land use in the Dublin City Development Plan 2022-2028, which itself has been the subject to Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA);
- The site clearance and construction phase is expected to give rise to slight to moderate, localised environmental effects that are typical of urban redevelopment projects of this nature;
- The location of the proposed development is a previously developed site in an existing urbanised location, which is not particularly sensitive to the environmental effects of development of this nature and scale. There are no designated sites or surface water bodies on the site or in the immediate vicinity. The receiving environment is densely populated, with residential and commercial receptors situated in close proximity; however, appropriate best practise mitigation measures have been incorporated into the proposal in order to avoid / minimise impacts insofar as possible.

Therefore, it is recommended that, having regard to the information set out above, the Competent Authority (Dublin City Council) may reach a screening determination that ***there is no real likelihood of significant effects arising as a result of the proposed development; and, therefore, that environmental impact assessment, and the preparation of an environmental impact assessment report is not required.***

6 References

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