

**Environmental Impact Assessment Screening Report
Proposed Mixed Use Development at
Newcomen Bank
Castle Street
Dublin 2**

Dublin City Council

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Introduction

This screening report in respect of Environmental Impact Assessment is compiled in relation to the proposal by Dublin City Council, under Part 8 of the Planning and Development Regulations 2001 (as amended), for development including change of use of the former Newcomen Bank, Castle Street, Dublin. The site includes a small area of the public road and footpath on Castle and Cork Hill and has an overall area of 0.065 Ha.

Newcomen Bank is a three storey over basement, ashlar Portland stone building with stone balustraded parapet and pitched and hipped slate roofs beyond. It is a building of importance in terms of architectural heritage and is a protected structure (RPS 2050). The building is also recorded by the National Inventory of Architectural Heritage (NIAH No.50910004) as of national rating and of architectural, artistic and social special interest. Newcomen Bank is located in close proximity to City Hall, also protected (RPS 2049), and a short distance from Dublin Castle (RPS 2051) which is also a recorded monument (DU018-020488-). The overall floor area of Newcomen Bank including the basement, is 1,325m².

This EIA screening report has been compiled by Karl Kent of Doyle Kent Planning Partnership Ltd, who has many years' experience of the EIA process and has qualifications in Architecture, Planning, Urban and Building Conservation and EIA management. Relevant contributions from other members of the design team in respect of the various environmental topics have been included in compiling the report. The design team for the proposed development is led by *Howley Hayes Cooney*, Grade 1 Conservation Architects. Other members of the design team include *CORA*, structural engineering, *Homan O'Brien*, M&E Engineers, *Jensen Hughes*, Fire Safety, *Austin Reddy*, Quantity Surveyors and *Altemar*, Environmental Consultancy.

Appendix I to this report indicates how the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive (Directive 2014/52/EU) have been taken into account.



Site Location Plan (Open Street Maps)

Site and Location

Newcomen Bank is three storeys high, plus an attic floor and basement, and is a particularly fine example of the Georgian architecture of the late eighteenth century. It is located immediately west of the City Hall and north of Dublin Castle overlooking the intersection of three streets, Castle Street to the south, Cork Hill to the east and Lord Edward Street to the north.

Immediately to the west of Newcomen Bank, on Castle Street, is an adjoining five storey (four floors plus set back penthouse) apartment block, the *Castle Gate Apartments*, dating from the 1990s. Also to the west of Newcomen Bank, on Lord Edward Street, is the four storey plus attic floor *Carnegie Trust Child Welfare Centre*, at No.21-25 Lord Edward Street. The latter is rated as “Regional” in the NIAH at No. 50910005 and dates from 1927. It is at a lower level than Newcomen Bank, as Lord Edward Street is considerably below the level of Castle Street. Between the *Carnegie Trust Child Welfare Centre* and Newcomen Bank is a fire escape route for pedestrians serving both the former bank building and the *Castle Gate Apartments*.

The origins of Newcomen's Bank are in the early eighteenth century and by the middle of that century the bank had relocated to two houses on Castle Street. In 1779, the owner of the bank, Sir William Gleadowe Newcomen, commissioned the architect Thomas Ivory to design a new bank premises and residence on a corner site opposite the recently completed Royal Exchange (now *City Hall*), just across from the gated entrance to Dublin Castle. Completed in 1781, Ivory's design solution for the difficult and irregularly laid out site was highly successful, resulting in a beautiful Adamesque Neo-classical building, with a principal façade addressing Castle Street and a second, also fine façade facing the Royal Exchange across Cork Hill. La Touche Bank (since demolished) sat opposite Newcomen Bank on Castle Street and these two institutions were the principal banks in the city in the 1780s.

Newcomen Bank was subsequently acquired by the Hibernian Bank in the nineteenth century, who extended the building in 1856, to incorporate a large banking hall at ground level, with the addition of trapezoidal shaped rooms on the first, second and third floors, overlooking City Hall. These alterations were to the designs of architect William Calbeck, who was notable for his architectural works on courthouses and banks across Ireland. The extension resulted in the doubling and mirroring of Ivory's design for the Cork Hill façade and including a large colonnaded, stepped front portico onto that street.

In 1884 Newcomen Bank was purchased by Dublin Corporation and shortly thereafter, in 1886, Lord Edward Street was built between Christ Church Place and Dame Street, resulting in an exposed north gable to Newcomen Bank. A further extension of the banking hall, along with a new façade, designed by City Architect Daniel Freeman was constructed, extending the building further north, with the addition of another room at basement level. A marble water fountain recessed within a decorative Portland stone niche was included at street level on Lord Edward Street and this work was the final substantial extension to the building.

More recently, a concrete lift and stair core was constructed adjoining the western side of the Newcomen Bank structure, in a backland location.

Newcomen Bank is one of the finest Georgian townhouses in Dublin and is the only townhouse in the city entirely faced in Portland stone. It has three principal facades onto Castle Street, Cork Hill and Lord Edward Street and contains superb Neo-Classical interiors. These include a number of

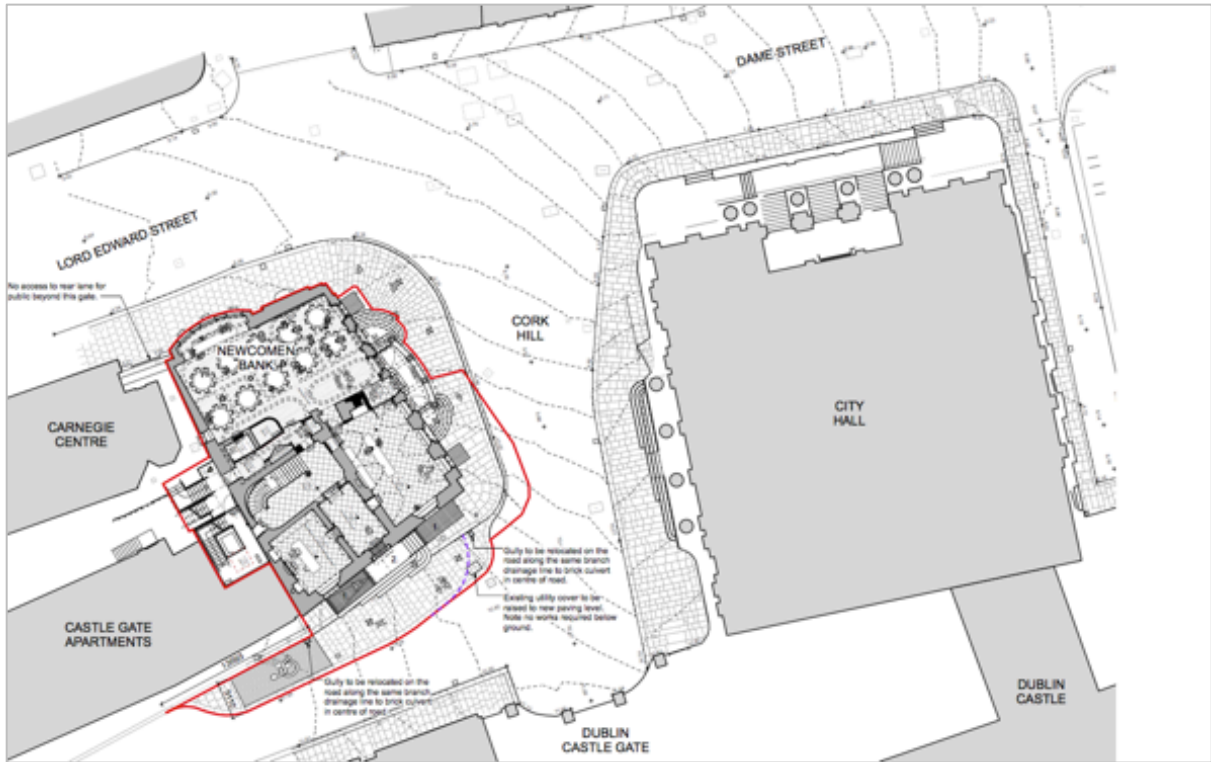
elliptical shaped rooms that are thought to have inspired the Oval Office in the White House in Washington, which was designed by James Hoban, who was a student of Thomas Ivory, the architect who designed Newcomen Bank. The building also contains one of the city's finest hanging stone staircases, sometimes referred to as "cantilevered stairs." The cobbled place between the former bank and its immediate neighbours - Dublin Castle to the south, and the former Royal Exchange (now City Hall) to the east, is arguably the finest Georgian streetscape in the city and one of the most atmospheric historic places in Dublin.

The NIAH assessment quotes from Professor Christina Casey¹ :

Built for William Gleadowe, to designs by Thomas Ivory who created a sophisticated interior layout from an irregular plan. Described by Casey as '(a)n enigmatic and exquisitely made building', originally with two three-bay elevations - one facing Castle Street and the other facing Cork Hill. The Cork Hill elevation was doubled in length in 1862 by William Caldbeck. The north gable, facing Lord Edward Street, was added by D.J. Freeman in 1884. The original design had a sophisticated proportioning system subsequently 'gently bludgeon(ed)' by Caldbeck's extension. The building exhibits a great deal of finely detailed, excellent masonry, including carving by Simon Vierpyl, evident in the first floor impost course and entablature frieze of superb quality. The trompe-l'oeil ceiling to first floor oval drawing room is possibly by the Italian artist Vincent Waldre. The building is also of considerable historic interest being an early example of the development of banking in the city. Together with the City Hall it also contributes to the approach to Dublin Castle.

Dublin Corporation bought and extended Newcomen Bank in the late nineteenth century, since when it has been in almost constant use, most recently as the rates office of Dublin City Council (DCC). However, the building is currently not in use and DCC wishes to conserve it and make it more accessible to the public by changing use of most of the floors to provide a suite of civic rooms, for cultural, commercial, ceremonial and social uses, both by the council and the public. It is envisaged that the adjacent City Hall could operate in tandem with Newcomen Bank for special functions, civic and private.

¹ *The Buildings of Ireland : Dublin*, Casey, Christina, published by Yale University Press, 2005



Site Layout Plan

Description of Proposed Development

The development will consist of –

(A) Refurbishment of Newcomen Bank which is a Protected Structure (Ref. No. 2050), and part change of use to provide multi-purpose spaces, visitor and staff facilities, and offices for Dublin City Council and future tenants. Works will include conservation and repair of existing historic fabric, and general upgrades to meet fire safety and accessibility requirements.

(B) Demolition of the existing twentieth century four storey lift and stair structure to the west façade of Newcomen Bank.

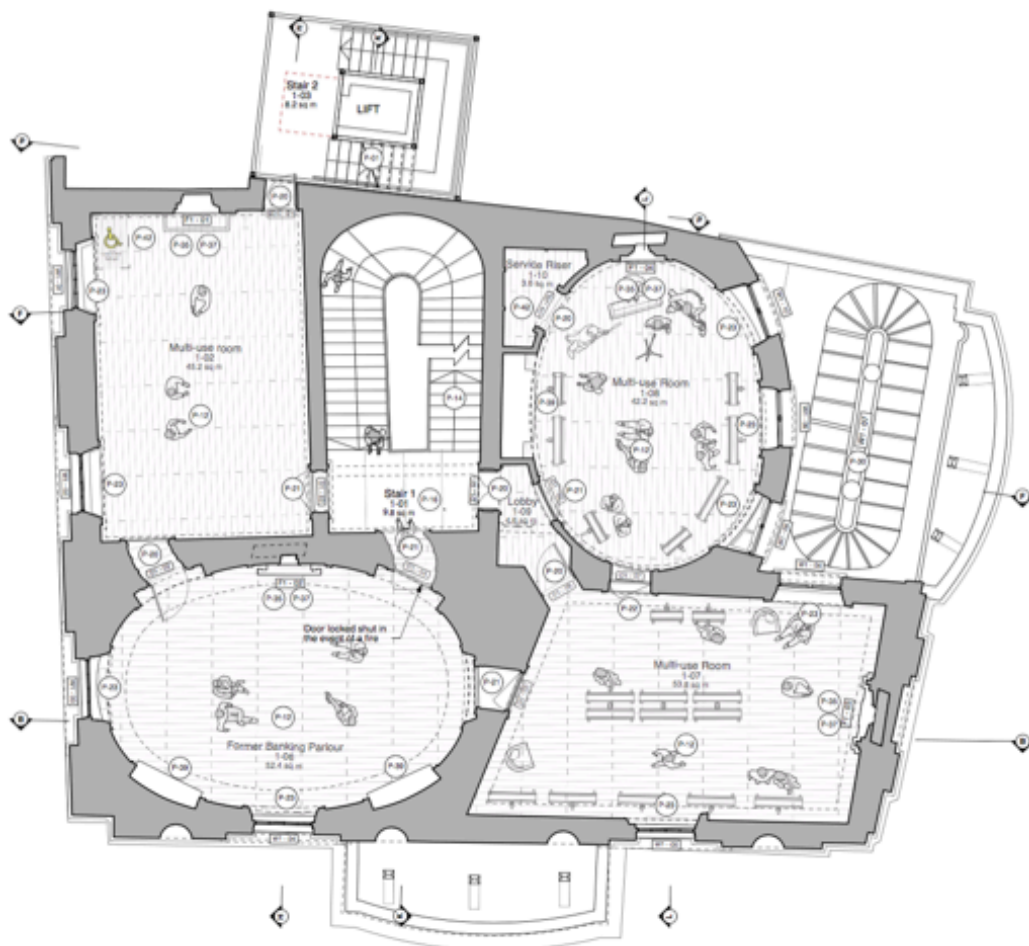
(C) Construction of a new five storey lift and stair structure to the west façade of Newcomen Bank, which will provide access to the basement.

(D) Installation of new stone steps with ramped access to the Castle Street entrance for universal access and extension of the pedestrian paving, with relocation of one accessible car parking space.

(E) Basement areas at Castle street to be opened up and new cast iron pavement lights with glazed inserts added to the areas.

The proposals are set out primarily in the architectural drawings and the *Design Statement* by Howley Hayes Cooney Architects (HHCA).

The design concept is to return the building as far as is possible to its original layout, by removing those later accretions and finishes that detract from the special interest of the building. Design interventions have been carefully considered, to ensure minimal impact on historic fabric, and to ensure the most important spaces within the building can be fully reinstated to the original Georgian design. To inform the detailed design, stakeholder consultation meetings were held throughout the planning phases, including with the steering group and with a variety of groups including heritage bodies, the OPW, internal DCC departments, adjacent landowners and the Department of Housing, Local Government and Heritage.



Proposed First Floor Layout (HHCA)

Last used as offices, it is now proposed to change the use of most of the building to function as a place of assembly, which may be accessible to members of the public and to be used for meetings, recitals, exhibitions or comparable purposes. For reasons of accessibility and fire safety, the uppermost third floor will be used as offices with a limited number of occupants. An enhanced level of fire safety will be required within the building, services throughout will need to be upgraded and universal access provided.

On the ground floor the historic banking hall has been identified as a large events / exhibition space with a capacity of 175 people, supported by other rooms across the ground floor. Over the first and second floors are seven fine Georgian rooms of varying size, which can accommodate a wide range of small to medium sized activities e.g. business workshops, small conferences, lectures, etc. of particular importance is the elliptical room on the south east corner of Castle Street and Cork Hill,

which includes a painted trompe l'oeil ceiling and which is believed to have been the model for the original Oval Office in the White House. In the second floor, it is proposed to retain the existing historic layout with two small meeting rooms varying the building's meeting room offering.

At basement level, the main plant and services will be located, including water storage and gas fired boilers as well as toilets. But there may be scope to use some of the rooms as rehearsal spaces. Several existing openings within the basement walls are later alterations and new openings are also proposed under this scheme. The intention here is for new contemporary insertions, in the form of portal frames, containing contemporary doors, clearly delineating between historic and new fabric.

The existing main stairs, of Portland stone, has been compromised over the years, most recently by the addition of very unsightly steel sections to act as a structural support. Subject to further detailed expert consideration, It is proposed to restore the structural integrity of the stairs to enable removal of these additions.

The existing modern concrete stairs / lift core is located outside the historic building and is substandard in terms of safety. This will be demolished and a new externally mounted steel stairs will be built clad in stainless steel mesh, will replace the existing stair core. The new stair core will serve all floors, unlike the existing. Demolition and replacement of the existing core will require excavation below the level of the existing basement. Mini piles will be embedded to bedrock as part of the foundation of the new core.

The main interventions into structure within the historic building include strengthening of floors and upgrades of floors in respect of acoustics and fire separation. Services will also be routed through floors, where possible and this will be carried out in tandem with the upgrade works. Existing floor boards will be kept, temporarily lifted and repaired, before they are re-laid in their original positions. Also within the historic building, the surviving historic timber stairs that connects the second and third floors is deficient by poor floor to ceiling heights, narrow winders, materiality and non-compliance with basic fire safety requirements. This stairs will only be partially retained as an historic artefact with a new staircase constructed to its rear to provide the required safe access between the second and third floors.

Where new insertions are proposed, such as tea-stations, fixed furniture, storage and reception desk, these elements will be designed to appear as inserted furniture pieces, contemporary in style, but subtle, so as not to detract from the historic interiors. Reversibility will be paramount, so that these elements can be easily removed in future, should the functions of some of these rooms change.

In order to make the existing Castle Street entrance to Newcomen Bank accessible, it is proposed to provide a new sloped surface in the street from the west, with new Portland stone steps forming a platform over the existing granite steps at the entrance doorway. The new sloped surface will be a large ventilated pavement light/window, thereby providing ventilation and natural light to the basement. The pavement light will be constructed of cast iron, as was typical of pavement lights in the early nineteenth century, incorporating glazing and ventilation grilles. Pavement lights on each side of the existing entrance will also allow some natural light into the basement. (There is physical evidence that there were once lightwells, or grilles to allow light into the lower level).

It is also proposed to extend the granite paving out into Castle Street, with new Leinster granite laid out to match the historic pattern. This will provide a more generous gathering space for pedestrians, which would be of particular importance during events. The radial granite paving and double step feature to the corner of Castle street and Cork Hill is of high historic value, and will be retained and remain expressed. Accessible parking will be moved further west of the new entrance allowing easy access for wheelchair users and ambulant disabled persons.

Environmental Impact Assessment

European Union Directive 2011/92/EU, as amended by Directive 2014/52/EU, *on assessment of the effects of certain public and private projects on the environment* is commonly known as the EIA Directive. The EIA Directive sets out classes of projects, which are likely to have significant effects on the environment and for which, therefore, Environmental Impact Assessment (EIA) is obligatory (Annex I) or for which EIA may be required (Annex II).

Determination of whether a project in Annex II is likely to have significant effects on the environment, and therefore requires EIA, may be by way of application of thresholds, or on a case by case basis, or a combination of both methods. Criteria to determine, on a case by case basis, whether a project of a type listed at Annex II is likely to have significant effects on the environment and should be subject to EIA, are set out at Annex III to the Directive and the information to be provided in this regard to the relevant development consent authority, by the developer, is set out at Annex IIA.

The provisions of the said Annexes to the Directive are transposed into Irish law for the purposes of planning and development primarily per the Planning and Development Regulations, 2001, as amended. Reflecting Annex II of the Directive, the Irish Regulations, at Schedule 5, Part 2, set out the categories of development (projects) for which EIA may be required, depending on their likely significant environmental impacts. Thresholds, generally related to scale or size, are set out in the said Schedule 5, Part 2, of the Regulations, above which EIA is mandatory and below which EIA may be required (i.e. sub-threshold developments). A definition of sub-threshold development is set out at Article 92 of the said Regulations:

“ sub-threshold development’ means development of a type set out in Part 2 of Schedule 5 which does not equal or exceed, as the case may be, a quantity, area or other limit specified in that Schedule in respect of the relevant class of development;”

Criteria to determine on a case by case basis whether sub-threshold development listed in Part 2, Schedule 5, of the Planning and Development Regulations, 2001, as amended, should be subject to EIA are set out in Schedule 7 of the Regulations (corresponding to Annex III of the Directive).

Schedule 7A of the Regulations sets out the categories of information required in order for the planning authority to make such determination (corresponding to Annex IIA of the Directive).

This EIA screening report addresses the matters set out in Schedules 7 and 7A to the Planning and Development Regulations, 2001, as amended, and has regard to guidance contained in:

- *Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report (Directive 2011/92/EU as amended by 2014/52/EU)*, 2017, Commission of the European Union.
- *Environmental Impact Assessment of Projects: Guidance on Screening (Directive 2011/92/EU as amended by 2014/52/EU)*, 2017, Commission of the European Union.
- *Interpretation of definitions of project categories of Annex I and Annex II of the EIA Directive*, 2015, Commission of the European Union.
- *Guidelines on the information to be contained in Environmental Impact Assessment Reports*, EPA, 2022.
- *Environmental Impact Assessment Screening, OPR Practice Note PN02*, 2021, Office of the Planning Regulator.
- *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment*, 2018, Department of Housing, Planning and Local Government.

Screening for Environmental Impact Assessment

The Planning and Development Regulations, 2001, as amended, Schedule 5, Part 2, sets out the following classes of project, which are considered relevant to the proposed development at Newcomen Bank in relation to EIA:

10. Infrastructure projects –

(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).'

14. Works of Demolition

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.

15. Any project listed in this Part which does not exceed a quantity, area or other limit specified in this Part in respect of the relevant class of development but which would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.

The proposed development at Newcomen Bank is a project of a type specified at 10(b)(iv) of Schedule 5, Part 2, of the Regulations, but is greatly sub-threshold. The site is within a built-up area, but at 0.07 ha is significantly below either the thresholds of 2 or 10 hectares.

In relation to sub-threshold projects coming *prima facie* within the scope of class 10(b)(iv), class 14, or class 15, the relevant consideration is whether the proposed development is likely to have significant effects on the environment, as assessed in accordance with the criteria set out at Schedule 7 of the Regulations and using the information required in accordance with Schedule 7A.

Schedule 7A Information

Schedule 7A of the Planning and Development Regulations, 2001, as amended, sets out the information to be provided by the applicant to enable the planning authority to screen sub-threshold development for EIA. This is set out both above, in the sections describing the site and the proposed development, and in the comments in the table applying the Schedule 7 criteria below.

Schedule 7A requires the following information:

- 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.*

Schedule 7 Criteria

The criteria contained in Schedule 7 of the Planning and Development Regulations, 2001, as amended, have informed this Environmental Impact Assessment Screening Report. The text of Schedule 7 is repeated in Appendix II to this report.

Application of Schedule 7 Criteria

The criteria set out at Schedule 7 fall within three main headings:

1. Characteristics of the development
2. Location of the development
3. Types and characteristics of potential impacts

These are set out in the table below with relevant comment. The application of the Schedule 7 criteria below takes account of the environmental factors set out in at Section 171A of the Planning and Development Act, 2000, as amended, and also Schedule 6(2)(d) of the Planning and Development Regulations, 2001, as amended. These environmental factors are:

(I) population and human health;

(II) biodiversity, with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive;

(III) land, soil, water, air and climate;

(IV) material assets, cultural heritage and the landscape;

(V) the interaction between the factors mentioned in clauses (I) to (IV)

SCHEDULE 7 CRITERIA	Comment
<p>1. Characteristics of the Development:</p> <p>The characteristics of proposed development, in particular -</p>	
<p>a) the size and design of the whole of the proposed development</p>	<p>The proposed development is essentially a change of use plus associated works to an existing historical building. Newcomen Bank has a floor area of 1,325m² including basement. The proposed stairs and lift structure to the rear (west) has a floor area of 24m² plus external steps of 16.5m². The site area is 0.065ha.</p>
<p>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 Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment</p>	<p>The site is located in an area of mixed uses, which is zoned as Z5: City Centre. It is in close proximity to Dublin Castle and the City Hall, both of which host activities broadly similar to those proposed for Newcomen Bank. The Castle also holds the Chester Beatty Museum. The scale of conference provision in Newcomen Bank will be considerably smaller than in Dublin Castle. In the wider area are many other cultural centres including the two cathedrals, theatres and venues.</p> <p>There are many planning permissions for development in the immediate vicinity, but the effects on the local environment is not likely to be substantial, given the</p>

	<p>developed urban nature of the environs of Newcomen Bank.</p> <p>Of particular relevance is a Part 8 planning procedure in respect of a paving renewal of Castle Street/Cork Hill/Exchange Court, Reg. Ref. 2277/17, approved by the City Council on 3rd July 2017. That scheme has not been implemented to date, but is generally compatible with the current proposals.</p> <p>Permission was granted to the OPW in 2018 for a new cultural and visitor facility at the Record Tower, Dublin Castle per Reg. Ref. 2646/18.</p> <p>Also of note is the recently published <i>Dublin Castle Strategic Framework Masterplan 2022</i>. This is a non-statutory high level vision for the future development of Dublin Castle to improve accessibility and develop a range of projects. The Masterplan includes modification of the public realm between Newcomen Bank, City Hall and the Cork Hill entrance to the Castle. However, this is not a project as yet, but a high level vision in the early stage of planning.</p>
c) the nature of any associated demolition works	Demolition works are not extensive and are confined to removal of the modern stair and lift core (c.26m ²), adjoining external steps and removal of very limited sections of building fabric internally. Also proposed are changes to the public realm immediately adjoining the building, including removal of fill material from the Newcomen Bank basement under.
d) the use of natural resources, in particular land, soil, water and biodiversity	The property is a small urban site and no significant natural resources will be used.
e) the production of waste	Waste generated during demolition and construction works will be typical of small scale urban development. Management of waste will accord with the provisions of <i>Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects</i> , published by the Dept. of Environment etc. in 2006. As set out in the <i>Preliminary Construction and Demolition Waste Management Plan</i> , this will be addressed in further detail in the construction management plan by the contactor. Waste during the operational phase will be largely domestic type municipal waste of modest volume.
f) pollution and nuisances	The demolition and construction phases of the development are likely to generate localised, short term noise, vibration and dust emissions. These will not be significant and will be mitigated in accordance with the detailed construction management plan by the contactor. During the operational phase, the development is not likely to generate any emissions of consequence.
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	There are no significant risks of major accidents or disasters relevant to the project. The site is not in the vicinity of any establishment with a particular risk of accident or disaster (e.g. Comah/Seveso type establishment). The site is outside any area subject of tidal or fluvial flood risk as identified in the <i>Water Services and Flood Risk Assessment</i> by CORA Engineers.
h) the risks to human health (for example, due to water contamination or air pollution)	Having regard to the nature and location of the proposed development, there are no risks to human health.

2. Location of the 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 site is located in an area of mixed uses, which is zoned as Z5: City Centre. Newcomen Bank was used as offices for many years. The uses now proposed are in accordance with the Development Plan land use zoning. Newcomen Bank is in close proximity to Dublin Castle and the City Hall, both of which host activities broadly similar to those proposed for Newcomen Bank. The wider area has a rich mix of land uses and there are many other cultural centres including the two cathedrals, theatres and music venues.
(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground	Having regard to the limited scale and urban location of the development, natural resources within and in the immediate environs of the site are limited. Water consumption will be c.2,000 litres per day.
(c) the absorption capacity of the natural environment, paying particular attention to the following areas:	Dublin City centre is not a location of wetlands, mountain and forest areas or nature reserves. In respect of riparian areas and river mouths, the River Liffey is c.150m from Newcomen Bank and runs through the City to discharge into Dublin Bay. But there is no direct hydrological pathway from the site to the river. There are no significant elements of the natural environment on, or in the environs of, the site.
(i) wetlands, riparian areas, river mouths	Not applicable
(ii) coastal zones and the marine environment	Not applicable
(iii) mountain and forest areas	Not applicable
(iv) nature reserves and parks	Not applicable
(v) areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive	There are no natural heritage designations in the immediate vicinity of Newcomen Bank. Further away, there are designated sites (South Dublin Bay SAC, North Dublin Bay SAC, South Dublin Bay and River Tolka Estuary SPA, North Bull Island SPA) the nearest of which is within approximately 1km in Dublin Bay. But there is only a very weak hydrological connection to Newcomen Bank via Ringsend Waste Water Treatment Works.
(vi) 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	Bathing waters in Dublin Bay are generally of good quality, but with some occasional shortfalls. Most recent monitoring by Dublin City Council (18 th June 2023) showed good quality with the exception of the Half Moon monitoring station. The Ringsend WWTW is currently being upgraded.
(vii) densely populated areas	Given the nature and scale of the proposed development, it will not significantly affect population density. Preliminary Census 2022 results show Dublin City with population density of 5,046 per km ² .
(viii) landscapes and sites of historical, cultural or archaeological significance	The site of the proposed development is within an area rich in historical and cultural heritage. The environs of the site are designated as a <i>Conservation Area</i> in the Dublin City Development Plan, 2022-2028 (not an Architectural Conservation Area). The <i>National Inventory of Architectural Heritage</i> (NIAH) has identified a number of structures in the vicinity of

	<p>heritage value, as shown on the Historic Environment Viewer Map.</p> <p>The site is in an area with proven archaeological importance and is within the Zone of Archaeological potential of RMP DU018 020, Dublin City. Archaeological material is present below the basement floor slabs of Newcomen Bank, as indicated by testing on site.</p>
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<p>3. Types and characteristics of potential impacts</p> <p>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 Act, taking into account—</p>	<p>Note: The factors cited at Section 171A of the Act are:</p> <p><i>(I) population and human health;</i> <i>(II) biodiversity, with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive;</i> <i>(III) land, soil, water, air and climate;</i> <i>(IV) material assets, cultural heritage and the landscape;</i> <i>(V) the interaction between the factors mentioned in clauses (I) to (IV)</i></p>
<p>a) the magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected)</p>	<p>The site area is 649m² and the proposed development will have a floor area of 1,325m². There will be no significant effects on a wider geographical area or on the population either during the construction phase or the operational phase.</p> <p>There will be localised impacts on the historic fabric of Newcomen Bank with the introduction of an accessible entrance and extended paving; with the removal of a portion of the historic stair; where services are introduced and with the taking down and construction of the new staircore to the rear. There will be localised impacts on archaeological deposits on site.</p> <p>A screening for Appropriate Assessment, under the provisions of the Habitats Directive, by Altemar Marine and Environmental Consultancy, has been completed which has identified those European / Natura 2000 sites of particular relevance. The screening has put forward information to reach a conclusion that the proposed development, individually or in combination with other plans and projects, would not be likely to have a significant effect on any Natura 2000 site.</p> <p>There will be no significant impacts on land, soil, water, air and climate.</p> <p>A bat survey by Altemar Marine and Environmental Consultancy established there are no bats on the site.</p>
<p>b) the nature of the impact</p>	<p>Construction impacts will be temporary to short term, of low intensity and complexity. Impacts will not be significant, having regard to their nature and scale and to the mitigation measures set out in the <i>Preliminary Construction and Demolition Waste Management Plan</i>. Operational impacts will not be significant.</p> <p>There will be a positive, long term impact on <i>material assets, cultural heritage and the landscape</i>, insofar as the proposed development will entail restoration of a Protected Structure, in accordance with good conservation practice, as described in the <i>Design Statement and Architectural Impact Assessment</i> by</p>

	<p>Howley Hayes Cooney Architects, and enhance the setting of Newcomen Bank by improving the streetscape. The <i>Architectural Impact Assessment</i> concludes that, overall the impact of the design proposals should be considered positive, as the building will be fully conserved and brought into public use, with only moderate intervention and alteration throughout.</p> <p>Testing on site has indicated that there are archaeological deposits. All construction works in the basement or external area, including any enabling works, excavations for services and the lifting of all or part of all existing floor slabs will be archaeologically monitored, as set out in the <i>Archaeological Impact Assessment</i> by Ailsling Collins. Impacts will be localised, permanent and moderate.</p> <p>Having regard to the findings of the <i>Architectural Impact Assessment</i> and the <i>Archaeological Impact Assessment</i>, the effects on <i>material assets, cultural heritage and the landscape</i> will not be significant, having regard to the scale of the proposed development and the localised nature of the impacts.</p>
c) the transboundary nature of the impact	There will be no transboundary effects.
d) the intensity and complexity of the impact	Construction impacts will be temporary to short term, of low intensity and complexity. Operational impacts will be positive and not significant.
e) the probability of the impact	Temporary to short term construction impacts are likely, but will not be significant.
f) the expected onset, duration, frequency and reversibility of the impact	Construction impacts will be evident from commencement of the development, will last through the construction period (one year plus), will be frequent throughout this period and will not be reversible. Upon commencement of the operational phase of the development, impacts will be long term to permanent, non reversible and not significant.
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 Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment	Having regard to the nature, scale and location of the proposed development, when considered in combination with other existing or permitted development, any cumulative effects will not be significant.
h) the possibility of effectively reducing the impact	Mitigation of construction impacts is set out in the <i>Preliminary Construction and Demolition Waste Management Plan</i> , in the <i>Design Statement</i> and <i>Architectural Impact Assessment</i> and in the <i>Archaeological Impact Assessment</i> .

Conclusion

The examination of the proposed development against the criteria set out at Schedule 7 of the Planning and Development Regulations, 2001, as amended, is set out in the table above. Other relevant assessments of the effects on the environment of the proposed development have also been taken into account (Appendix I to this report).

The proposed development is sub-threshold in relation to the criteria and thresholds set out in Schedule 5, Part 2, of the Planning and Development Regulations, 2001, as amended. It is concluded having regard to the nature, scale and location of the subject site, as also to the mitigation measures set out in the relevant reports including, in particular, the *Design Statement and Architectural Impact Assessment* by Howley Hayes Cooney Architects, the *Archaeological Impact Assessment* by Aisling Collins and the *Preliminary Construction and Demolition Waste Management Plan* and the *Water Services and Flood Risk Assessment*, by CORA Engineers, that the proposed development, by itself or in combination with other projects, is not likely to have significant effects on the environment (direct, indirect or cumulatively with other development). Accordingly, it is considered that an Environmental Impact Assessment is not required.

Appendix I : Other Relevant Assessments

Other Relevant Assessments Taken into Account in EIA Screening Report

Directive	Assessment carried out	Conclusion
Directive 92/43/EEC, The Habitats Directive	Screening report for AA (by Altemar) Bat Fauna Survey by Altemar.	Development would not be likely to adversely affect any Natura 2000 site. The site is of only limited biodiversity interest.
Directive 2000/60/EC, EU Water Framework Directive	EPA assessed the nearby River Liffey in relation to the Water Framework Directive (WFD) Objective of <i>at least good status by 2027</i> .	River Liffey (transitional waters) at risk of failing to meet WFD Objective But no direct hydrological link to Newcomen Bank site.
The Bathing Water Directive (2006/7/EC)	Dublin City Council monitors bathing water quality	Dublin Bay generally complies with standard.
Urban Waste Water Treatment Directive 91/271/EEC, as amended	Irish Water <i>Annual Environmental Report 2020</i> on Ringsend WwTP	Ringsend WwTP performing below standard, but improvement works under way.
Directive 2001/42/EC, SEA Directive	The formulation of this Part 8 proposal is in accordance with the provisions of the Dublin City Development Plan, 2022-28. This has been subject to assessment in accordance with the SEA Directive	The proposed development accords with the Development Plan which itself has been subject to assessment in accordance with the SEA Directive
Directive 2002/49/EC, Environmental Noise Directive	Nature and scale of the development are such that, in the absence of mitigation measures, construction noise is more likely to give rise to impacts rather than operational noise. BS 5228 Code of practice for noise and vibration control on construction and open sites is designed to mitigate such impacts.	Subject to mitigation, in compliance with BS 5228 Code of practice for noise and vibration control on construction and open sites, the construction phase will not give rise to any significant impacts.
Directive 2008/50/EC on ambient air quality and cleaner air for Europe	EPA carries out monitoring The Dublin City area reported to have "good" air quality.	Subject to compliance with mitigation to be set out in the final <i>Construction and Demolition Waste Management Plan</i> , there will be no significant impacts on air quality.
Directive 2007/60/EC on the assessment and management of flood risks	Strategic Flood Risk Assessment by Dublin City Council, as set out in the Dublin City Development Plan, 2022-2028.	The development is not located in an area at risk of flooding.
Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives (The Waste Framework Directive) Directive 1999/31/EC of 26 April 1999 on the landfill of waste	The Waste Framework Directive sets the basic concepts and definitions related to waste management, including definitions of waste, recycling and recovery. The <i>Preliminary Construction and Demolition Waste Management Plan</i> addresses the question of demolition and construction waste.	Waste generated during demolition and construction works will be typical of small scale urban development, as set out in the <i>Preliminary Construction and Demolition Waste Management Plan</i> .

Schedule 7 Criteria

CRITERIA FOR DETERMINING WHETHER DEVELOPMENT LISTED IN PART 2 OF SCHEDULE 5 SHOULD BE SUBJECT TO AN ENVIRONMENTAL IMPACT ASSESSMENT

1. *Characteristics of proposed development*

The characteristics of proposed development, in particular—

- (a) the size and design of the whole of the proposed development,
- (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 Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment,
- (c) the nature of any associated demolition works,
- (d) the use of natural resources, in particular land, soil, water and biodiversity,
- (e) the production of waste,
- (f) pollution and nuisances,
- (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
- (h) the risks to human health (for example, due to water contamination or air pollution).

2. *Location of proposed development*

The environmental sensitivity of geographical areas likely to be affected by the proposed development, with particular regard to—

- (d) the existing and approved land use,
- (e) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground,
- (c) the absorption capacity of the natural environment, paying particular attention to the following areas:
 - (i) wetlands, riparian areas, river mouths;
 - (ii) coastal zones and the marine environment;
 - (iii) mountain and forest areas;
 - (iv) nature reserves and parks;
 - (v) areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive and;
 - (vi) 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;
 - (vii) densely populated areas;
 - (viii) landscapes and sites of historical, cultural or archaeological significance.

3. *Types and characteristics of potential impacts*

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 Act, 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),
- b) the nature of the impact,
- c) the transboundary nature of the impact,
- d) the intensity and complexity of the impact,
- e) the probability of the impact,
- f) the expected onset, duration, frequency and reversibility of the impact,
- 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 Act 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
- h) the possibility of effectively reducing the impact.