

ENVIRONMENTAL REPORT

In respect of

**Proposed Student Accommodation on lands at
Nolan Seafoods, Rathdown Road, Dublin 7**

Prepared by

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On behalf of

NTM ROI Seed Capital LP

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1.0 INTRODUCTION

- 1.1. On behalf of the applicant, NTM ROI Seed Capital LP, Citypoint, 65 Haymarket Terrace, Edinburgh, EH12 5HD, John Spain Associates have prepared an Environmental Report to assess the potential impacts on the environment of the proposed student accommodation development at H J Nolan Limited, Rathdown Road, Dublin 7.
- 1.2. The proposed development will comprise the demolition of the existing buildings on the site and the provision of 289 no. student accommodation units over 2 no. blocks ranging in height from 3 no. storeys to 7 no. storeys and comprising 42 no. clusters comprising a variety of 4, 6, 7 and 8 no. bedrooms respectively. 6 no. disabled access rooms are provided. Block A to the west extends to 3 no. storeys, with Block B to the east reducing in height from 6 no. storeys at its most northerly point to 4 no. storeys moving south. Total gross floor area equates to 8,595.6 sq.m.
- 1.3. The proposed development includes a reception and administrative area, laundry room, gym, internal amenity areas, study rooms in both blocks and a TV room. Internal amenity space totals 538.5 sqm External landscaped amenity space is provided through a combination of shared surfaces, recreational and sports areas and seating, in combination with balconies and a roof terrace at fifth storey level, totalling 1602.4 sq.m. Total amenity space equates to 2,140.9 sq.m.
- 1.4. A specified set down area is located in the southern part of the site in close proximity to the entrance. 90 no. secure bicycle parking spaces are also provided. All ancillary servicing, refuse storage, and infrastructure is included within the application site, with plant enclosed at roof level at Block B. The proposals also include the upgrade of access laneway linking the site to Rathdown Road and provision of a pedestrian route at this location.
- 1.5. This report will accompany the Strategic Housing Development Application. The possible effect on the environment has been examined through the process of an EIAR Screening which will be detailed below.
- 1.6. This document is submitted in response to Section 6 of the Planning Application form which request that a statement be submitted identifying the potential impacts of the proposed development on the environment.

2.0 SITE DESCRIPTION

- 2.1 The subject site comprises of approximately 0.4 hectares of brownfield lands which are currently in use as a seafood processing plant operated by H J Nolan Limited. The back land site is a general 'V' shape and reduces in elevation moving south, from its highest point at its north east corner. The site is occupied by 2 no. permanent buildings bordering its western and northern boundaries respectively. The building located in the western part of the site is of concrete construction with a pitched metal sheeting roof. The building stretches the entire length of the boundary, and is partially single storey, rising to 3 no. storeys at the southern end of the site, adjacent to the point of entry.
- 2.2 The building in the northern part of the site is a single storey warehouse style building of concrete and aluminium sheet construction with a shallow pitched

- roof. The adjoining site to the north is currently under construction for student accommodation, with maximum heights of 7 no. storeys.
- 2.3 The remaining area of the site is occupied by hard standing tarmac which provides storage, surface car parking and a turning head for vehicle manoeuvrability. A belt of trees lies beyond the site boundary to the north, with a permeable steel fence marking the eastern boundary, directly beyond which lies the Luas Green Line stop at Grangegorman.
- 2.4 The southern boundary of the site is marked by a stone wall approximately 3m in height. This extends to the south west, forming the southern boundary of the laneway from which access to the site is gained from Grangegorman Lower. Pedestrian access to the Grangegorman Luas platform runs directly south of this wall.
- 2.5 Residential development is the dominant land use in the area, with existing traditional red brick 2 no. storey homes located to the west of the site at Grangegorman Lower, with rear gardens extending to meet a gated laneway, over which the neighbouring properties have rights of way, between the boundary of the site and the fence-lined perimeter of the gardens. The majority of these rear gardens have small sheds or other structures located at their eastern extremities. The rear building line of these dwellings is located approximately 25m from the western boundary of the subject site.
- 2.6 Additional residential development is located to the north west at Rathdown Road and to the south at Marne Villas, with the Dublin Institute of Technology Grangegorman Campus located within 100m west of the site entrance. The transport depot at Broadstone is located a short distance east of the site, beyond the Luas line.
- 2.7 The site is extremely well served by public transport, being directly adjacent to the Luas stop at Grangegorman. The 46a Dublin Bus route linking Phoenix Park and Dun Laoghaire is operational on North Circular Road, approximately 265m north. Additional Dublin Bus routes, nos. 4, 9, 40, 83, 111x and 140 run along Phibsborough Road, approximately 485m north east of the site. These provide links to Dublin City centre and the south side of the city to Kimmage, Rathmines, Limekiln Avenue and Monkstown Avenue, as well as Harristown, Charlestown and Ikea at Ballymun to the north of the city.

3.0 DESCRIPTION OF PROPOSED DEVELOPMENT

- 3.1 The proposed development comprises of the construction of 289 no. bed spaces of purpose-built student accommodation across 2 no. blocks orientated on the north-south axis. Block A, located to the west, extends to 3 no. storeys, consistent with the footprint and partial height of the building currently existing at the location, with a mono-pitch roof rising to the east. This comprises 2,706 sqm of gross floor area. Block B is located in the eastern part of the site and falls in height from 7 no. storeys in the north, to 5 no. storeys at its southernmost point. It is also finished with a mono pitch roof, with a roof terrace occupying its southerly tip at fifth floor level. Block B comprises 5,814.8 sqm of gross floor area.
- 3.2 A reception area, admin office, post boxes, laundry room, WC, study and TV lounge room are located at ground floor level of Block A at its most southerly point, adjacent to the site entrance. This ancillary and amenity provision

extends to 191.5 sqm. Each bedroom cluster benefits from a kitchen and living area within Block A.

- 3.3 Block B provides 347 sqm of internal amenity space, with a gym and exercise class room, as well as a cinema room located at ground floor level within the building's southern corner. The gym and exercise area benefits from vistas across an area of external amenity, increasing passive surveillance and contributing to a socially inclusive environment. Block B also includes balconies on its western elevation and a roof terrace at fifth storey level, adding 109 sqm to the total area of exterior amenity provided within the development.
- 3.4 The proposed development is at a strategically located brownfield, infill site which is considered to be ideal for use as student accommodation. The proposals will make optimal use of the land resource and will be fully compatible with neighbouring residential development. In this regard, it constitutes a superior neighbouring use compared with its existing use as an industrial fish processing premises. The proposals will also result in a net decrease in traffic movement to and from the site on a daily basis and contribute to a more pleasant environment for existing residents.
- 3.5 For further detail on the design rationale, please refer to the architectural drawings, design statement and the landscape drawings and statement which accompany this consultation request.

4.0 EIA SCREENING METHODOLOGY

Legislation & Guidance

- 4.1. This EIA Screening exercise has been guided by the following documents:
- Planning and Development Act 2000 (as amended);
 - Planning and Development Regulations 2001 (as amended);
 - Planning and Development (Housing) and Residential Tenancies Act 2016;
 - Directive 2011/92/EU;
 - Directive 2014/52/EU;
 - Transposition of 2014 EIA Directive (2014/52/EU) in the Land Use Planning and EPA Licensing Systems – Key Issues Consultation Paper (2017; DoHPCLG);
 - Preparation of guidance documents for the implementation of EIA directive (Directive 2011/92/EU as amended by 2014/52/EU) – Annex I to the Final Report (COWI, Milieu; April 2017)
 - Environmental Impact Assessment – Guidelines for Planning Authorities and An Bord Pleanála on carrying out (2013; DoECLG);
 - Environmental Impact Assessment – Guidance for Consent Authorities regarding Sub-threshold Development (2003; DoEHLG)
- 4.2. Using the above documents it has been possible to carry out a desktop EIAR Screening using the best available guidance while operating within the applicable legislation. It is noted that Directive 2014/52/EU is currently in effect but has not been transposed into Irish Legislation. The methodology employed in this screening exercise updates previous guidance in line with the new Directive 2014/52/EU.

EIA Thresholds

4.3. Schedule 5 of the Planning and Development Regulations 2001 (as amended) sets out the thresholds for which if a project exceeds, must be subject to an Environmental Impact Assessment.

4.4. Part 2 of Schedule 5 lists the following that may be relevant to the proposal:

'10. Infrastructure projects –

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

(iii) Construction of a shopping centre with a gross floor space exceeding 10,000 square metres;

(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.'

4.5. The proposal relates to the construction of 289 no. student accommodation bed spaces across 2 no. blocks at HJ Nolan Seafood Limited, Rathdown Road, Dublin 7, and is therefore below the threshold of an EIAR requirement.

4.6. The application site area is 0.43 hectares and provides a total gross floor area of 8,595.6 sq.m, which is significantly below the threshold for an urban context of 10ha.

4.7. The demolition of the existing buildings on site is proposed. A Construction & Demolition Waste Management Plan prepared by AWN Consulting Engineers accompanies this submission and makes provision for the safe and efficient disposal of all material from the site. Due to the site's current use as a fish processing business, it is not considered likely that any hazardous materials will be encountered at the location. Site investigatory works will be undertaken to assess the ground conditions at the site. Further works will be undertaken on the footprint of the existing building following their demolition.

4.8. No. 15 relates to projects likely to have significant effects on the environment having regard to Schedule 7. The following section and basis of this screening is to screen for the requirement of EIAR on a sub-threshold project as the

proposal does not exceed any other threshold in Schedule 5. As is set out in the following,

Sub Threshold Projects Requiring EIAR

- 4.9. Development which is below the threshold of requiring an EIAR as set out in Schedule 5 of the Planning and Development Regulations 2001 (as amended) may still require an EIAR.
- 4.10. Directive 2014/52/EU now supersedes Schedule 7 of the Planning and Development Regulations 2001 (as amended) until such times as it is transposed into Irish Legislation. It is therefore proposed to assess the likelihood of significant effects on the environment against the criteria and questions set out in Annex III of the EIAR Directives since the coming into effect of Directive 2014/52/EU.
- 4.11. The criteria are listed under three broad headings:
 - Characteristics of projects;
 - Location of Projects; and
 - Types and characteristics of the potential impact.

5.0 EIA SCREENING EXERCISE

Introduction

- 5.1. The following sections assess the development against the criteria for determining likely significant effects on the environment.

Characteristics of Proposed Development

Could the size and design of the whole proposed development be likely to cause significant effects on the environment?

- 5.2. The proposed development is of 289 no. student accommodation bed spaces within 47 clusters on a site area of 0.43ha. This comprises 8,595.6 sq.m of gross floor area across 2 no. blocks. Block A in the west of the site extends to 3 no. storeys and Block B to 7 no. storeys, falling to 5 no. storeys moving south. Internal amenity space equating 538 sq.m is provided across both blocks, with external landscaped amenity space totalling 1,602.4 sq.m. This is not a large-scale project or overly dense in an urban context and is well related and connected with a similar student accommodation scheme on adjoining lands to the north. This highlights the suitability of the site for the proposed scheme, which is compatible with its surrounding land uses and compliant with the site's zoning objective Z1 within the Dublin City Development Plan 2016-2022. In zoning the land for residential use, the Planning Authority will have thoroughly assessed the nature of the site to ascertain its capacity to accommodate such development and merit a zoning as designated. There are no apparent characteristics or elements of the design of the scheme that are likely to cause significant effects on the environment.

Could the development in culmination with other proposed and/or approved developments be likely to cause significant effects on the environment?

- 5.3. The subject lands are brownfield in an urban context. It is noted that a similar student accommodation scheme was granted planning permission by An Bord Pleanála on 1st November 2017 (ABP Ref.: PL29M.248726) on adjoining lands to the north. Planning permission was granted for 444 no. bed spaces across 420 bedrooms. In its assessment, An Bord Pleanála concluded that the proposed development would not be likely to have a significant effect individually or in combination with other planned development upon a European site. In this context, the proposed development, which is smaller in scale and bed spaces, is unlikely to have any impacts on Natura 2000 sites. This is detailed further by the Appropriate Assessment accompanying this submission prepared by Openfield.

Could the nature of any associated demolition works be likely to cause significant effects on the environment?

- 5.4. The demolition and clearance of the existing buildings on site is required for the construction of the proposed development. A number of buildings currently occupy the site used for the processing of fish products and storage prior to distribution from the site. Due to the nature of the operations on site at present, it is not considered that the demolished buildings will result in any effects on the environment. A full site investigation will be undertaken and the ground conditions beneath the demolished buildings assessed prior to any construction taking place. The methodology for the efficient disposal of all materials arising from demolition is detailed within the Outline Construction & Demolition Waste Management Plan, prepared by Awn Consulting Engineers. The remediation of any issues of contamination on site is also detailed within the accompanying report. It is not anticipated that necessary demolition works will cause any significant effects on the environment.
- 5.5. The Ecological Assessment prepared by Openfield Ecological Services notes one 'moderate negative' impact on the environment. This is likely to arise as where demolition works are undertaken during the nesting season. In this regard, a single mitigation measure is proposed which advises demolition works should proceed outside the nesting season i.e. from September to February inclusive. Works must halt on encountering a nest and until such times as the nesting has ceased. Otherwise, a derogation licence must be sought from the NPWS to allow the destruction of the nest. Alternatively, roof netting can be installed outside the breeding season to prevent nesting occurring.
- 5.6. A Bat Survey Report prepared by Bat Eco Services accompanies this submission. It notes that whilst some bat activity was recorded on site, this was attributable to bats commuting. No evidence of bat roosts within the existing buildings was found and therefore the removal of these buildings will not have an impact on local bat population.

Could the use of natural resources in relation to the proposed development, in particular, land, soil, water and biodiversity be likely to cause significant effects on the environment?

- 5.7. No. There will be no large use of natural resources. The main use of resources will be the construction materials used. The scale and quantity of the materials used will not be such that would cause concern in relation to significant effects on the environment. Owing to the applicant's joint ownership of the site to the north, it is likely that the same contractors will be

commissioned for the subject site. This will provide continuity in construction and ensures that the contractors are familiar with the local context of the site.

- 5.8. The subject lands are brownfield in nature and are small within an urban context, extending to 0.43ha. The construction or operation of the scheme would not use such a quantity of water to cause concern in relation to significant effects on the environment. Water supply will be taken from available mains supply, as per the current situation at the site. This notes the sustainable nature of the development in utilising existing resources.
- 5.9. The subject lands are located in an urban context, disconnected from any sensitive biodiversity physically and/or hydrologically and no significant effects on the environment are envisaged in this respect.

Could the production of waste in relation to the proposed development be likely to cause significant effects on the environment?

- 5.10. No. There will likely be waste produced in the construction of the proposed scheme. It will be disposed of using licensed waste disposal facilities and contractors. The scale of the waste production in conjunction with the use of licensed waste disposal facilities and contractors does not cause concern for likely significant effects on the environment.
- 5.11. During operation, everyday waste and recycling from commercial and residential elements will be disposed of by an approved licensed waste disposal contractor.
- 5.12. The accompanying Outline Waste Management Plan, Construction & Demolition Waste Management Plan and Operational Waste Management Plan detail the methodologies employed for the efficient disposal of waste from the site. This will be regulated and managed by the on-site contractor.
- 5.13. Waste produced by student bedrooms will be stored and collected from a refuse storage area to the east of the site entrance. Bins will be provided in communal kitchen and living areas for the segregation of landfill waste, organic and dry recycling.

Could pollution and nuisances generated by the proposed development be likely to cause significant effects on the environment?

- 5.14. No. There will likely be potential for dust and noise produced during the construction phases. This will be managed by ensuring construction work largely operates within the approved hours of construction.
- 5.15. Standard dust and noise prevention mitigations measures as per the majority of planning applications of all scales will be employed and monitored. As such, pollution and nuisances are not considered to likely have the potential to cause significant effects on the environment.

Could 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 be likely to cause significant effects on the environment?

- 5.16. No. Standard construction practices will be employed throughout the construction phase. There are no technologies or substances to be used in the development which may cause concern for having likely significant effects on the environment. The subject lands are not proximate to any Seveso/COMAH designated sites.
- 5.17. The subject lands are zoned under the Dublin City Development Plan and as such have been subject to a both Strategic Flood Risk Assessment and Strategic Environmental Assessment. A Flood Risk Assessment prepared by Lohan & Donnelly Consulting Engineers included with the pre-application to the Board has not highlighted cause for concern in terms of flooding allowing for climate change.

Could the risk to human health (for example due to water contamination or air pollution) be likely to cause significant effects on the environment?

- 5.18. No. There is no impact on air pollution expected from the development outside of the potential dust impact. Standard mitigation measures previously outlined will be employed in this regard. In terms of water integrity, the scheme is to be connected to public foul and surface water systems and as such, no significant effects on the environment are likely.

Location of Proposed Development

Having regard to the existing and approved land use; could the environmental sensitivity of geographical areas be likely to be affected by the proposed development?

- 5.19. No. The proposed development is in an urban environment on land zoned for residential development. The student accommodation use is considered wholly appropriate with adjoining residential land use and the student accommodation scheme under construction on the site adjoining to the north. There are no notable sensitive environmental features in the vicinity of the site. The proposed development is considered to be more appropriate and possess a lower risk to the environment in comparison with the site's existing use.
- 5.20. The site is not directly connected by a watercourse to any protected sites. The development will be connected to the surrounding foul sewer and water utilities and treated to the appropriate standards at Ringsend Waste Water Treatment Plant. Surface water will enter Dublin Bay via the River Liffey after going through a 2 no. level treatment on-site filtration and attenuation prior to the public surface water system.
- 5.21. There are no Natura sites within a 2km radius of the site. South Dublin Bay SPA and SAC and the Poulaphouca Reservoir SPA are considered to fall within the zone of influence of this project. There is no direct pathway to the North Dublin Bay SAC and the North Bull Island SPA. There is a pathway from the site via surface and wastewater flows to Dublin Bay via the River Liffey and the Ringsend wastewater treatment plant respectively. Any effluent would then only be detrimental if heavy metals or other harmful chemicals were released during the construction process. Sediment by itself would not have a significant effect as it is one of the dominant habitat factors in an estuary that all organisms and habitats are adapted to.

- 5.22. Standard protocols of construction to prevent material entering the local drainage systems would minimise any discharge during construction and effectively prevent any impact on the downstream Natura 2000 sites.
- 5.23. In addition, the separate AA Screening report prepared by Openfield, Ecological Consultants has been prepared to accompany this pre-application consultation request and outlines the impacts on the Natura 2000 sites:

'This project has been screened for AA under the appropriate methodology. It has found that significant effects are not likely to arise, either alone or in combination with other plans or projects that will result in significant effects to the integrity of the Natura 2000 network.'

- 5.24. The main use of natural resources will be land. The land is located in a built up urban area on a brownfield site, thus has been previously been developed. The nature of the proposed development and the landscaping proposed throughout will improve the quality of the local environment and in comparison with the site's existing use. It will reduce areas of hard standing and ensure the sustainable disposal of water, operational waste which will comply with current regulations.

Having regard to the absorption capacity of the natural environment; could the environmental sensitivity of geographical areas be likely affected by the proposed development?

- 5.25. The absorption capacity is to be assessed under the headings as follows:

Wetlands, Riparian Areas and River Mouths

- 5.26. The proposed development is not within or directly connected to wetlands, riparian areas or river mouths. There is no known pathway between the site and these areas.

Coastal Zones and the Marine Environment

- 5.27. The proposed development is not within or directly connected to coastal zones or the marine environment. There is a pathway from the site via surface and wastewater flows to Dublin Bay via the River Liffey. There is no evidence to suggest that pollution through nutrient input is affecting the conservation objectives of the South Dublin Bay SPA.

Mountain and forest areas

- 5.28. The proposed development is not within or directly connected to any mountain or forest areas. There is no known pathway between the site and mountain or forest areas.

Nature reserves and parks

- 5.29. The proposed development is not within or directly connected to any nature reserves or parks. There is no known pathway between the site and nature reserves or parks.

Areas classified or protected under national legislation, including Natura 2000 areas designated pursuant to Directives 79/409/EEC and 92/43/EEC

- 5.30. The proposed development is not within or directly connected to protected environments.

Areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure

- 5.31. The site is not known to be located within or connected to such an area.

Densely populated areas

- 5.32. The proposed development is located within a densely populated area. The redevelopment of this brownfield will provide a student accommodation scheme at a highly accessible location. The site is zoned Z1 land and the use is compatible with the existing development and uses in the vicinity. Therefore, there are no anticipated likely significant effects on the environment in relation to the geographic location of densely populated areas.

Landscapes and sites of historical, cultural or archaeological significance.

- 5.33. The subject lands are not within or directly proximate to any Architectural Conservation Area, Protected Structure or a protected view or prospect. There are no known recorded archaeological monuments within the site boundary or indeed for several hundred metres. This detailed further within the Conservation Report prepared by Cathal Crimmins and Archaeological Assessment prepared by Archaeological Projects Ltd which accompany this submission.

Other Considerations of Significant Likely Effects

- 5.34. As previously set out, there are three headings under which the criteria for determining if a sub threshold development are likely to have significant effects on the environment. Two of these headings have already been discussed and assessed; however, before proceeding to the third heading, which is the consideration of the potential impacts, it is appropriate to take a holistic approach and assess the proposed development briefly under the sections required when submitting an EIAR since Directive 2014/52/EU. This approach will assist in identifying any possible significant effects on the environment that have not previously been identified.

Population & Human Health

- 5.35. As previously outlined, there may be possible short-term nuisances to human beings from noise and pollution. These are not likely to be at such a quantity or of such a significance that would warrant the completion of a sub threshold EIAR. Noise and dust or pollution will be subject to standard mitigation measures as per typical construction projects.
- 5.36. The proposed student accommodation scheme in the vicinity of DIT's Grangegorman campus will increased the stock of high quality student accommodation in close proximity to a third level institution and in a highly accessible location in respect of others, such as Trinity College Dublin, at a city centre location. It will deliver a high quality and professionally managed student accommodation scheme at an ideal and highly accessible location. This increased supply of student accommodation will service to displace

students from the rental market and enhance availability of accommodation in the area.

- 5.37. There are no operational impacts that would be likely to cause significant effects on the environment in terms of population and human health.

Biodiversity

- 5.38. As previously set out, the subject site is not included in any Natura 2000 site and does not support any of the habitats or species of interest listed. Therefore, it cannot have a 'reservoir' function in re-populating them, should this be necessary. There are no Natura sites within a 2km radius of the site. South Dublin Bay SPA and SAC and the Poulaphouca Reservoir SPA are considered to fall within the zone of influence of this project. The Royal Canal, a proposed NHA, is located approximately 1km north of the site. These features are noted at Appendix 1.

- 5.39. The South Dublin Bay SPA is located 3.2km from the boundary of the site but following the flow of the River Liffey, this distance is considerably more. Because of this significant distance, there is no pathway for loss or disturbance of habitats or semi-natural habitats that may act as ecological corridors for important species associated with the qualifying interests of the Natura 2000 sites.

- 5.40. An effluent would then only be detrimental if heavy metals or other harmful chemicals were released during the construction process. Sediment by itself would not have a significant effect as it is one of the dominant habitat factors in an estuary that all organisms and habitats are adapted to.

- 5.41. The Ecological Assessment prepared by Openfield Ecological Services notes one 'moderate negative' impact on the environment. This is likely to arise as where demolition works are undertaken during the nesting season. In this regard, a single mitigation measure is proposed which advises demolition works should proceed outside the nesting season i.e. from September to February inclusive. Works must halt on encountering a nest and until such times as the nesting has ceased. Otherwise, a derogation licence must be sought from the NPWS to allow the destruction of the nest. Alternatively, roof netting can be installed outside the breeding season to prevent nesting occurring.

Lands and Soils

- 5.42. The subject lands are a brownfield on what is typically made ground. A site investigation will be undertaken as a matter of course to ascertain the quality and content of the land on site. It is not likely that any significant effects on the environment with regard to soils and/or geology due to the site being connected to public foul, storm and water services will arise from the proposed development.

Water

- 5.43. The proposed development is located an appropriate distance from any significant waterways that may cause concern. It is considered that in relation to water, there are no anticipated significant effects on the environment arising from the proposed development.

Air & Climate

- 5.44. There may be a minor degradation of the air quality in a very localised area during certain parts of the construction process. Standard mitigation measures would be appropriate as set out in a construction management plan. It is considered that there will be no negative impact on the climate that would be likely to have a significant effect on the environment.

Noise & Vibration

- 5.45. There may be noise and vibration during the construction phase. It is considered that there will be no significant noise or vibration effects on the environment during the operational phase and construction phase subject to standard construction mitigation measures.

Landscape

- 5.46. There are no landscape designations on the subject site. The site will not impact on any designated views or prospects within the Dublin City Development Plan 2016-2022. It is not considered that there will be likely significant effects on the environment effects on the environment in relation to landscape.
- 5.47. The visual impact of the proposed development on the surrounding area has been separately assessed in a Landscape and Visual Impact Report prepared by Chris Kennett Consulting which is submitted with this pre-application consultation request.

Material Assets

- 5.48. The land on which the site is situated is a material asset. It has been zoned for residential development through the appropriate process, and as such, the use of this material asset in a manner compatible with the zoning designation, is entirely appropriate.

Archaeology, Architecture and Cultural Heritage

- 5.49. The subject lands are not proximate to any Protected Structure or Architectural Conservation Area. A desktop Archaeological Assessment has also been carried out by Archaeological Projects Ltd which is included as part of this pre-application consultation request. A Conservation Report prepared by Cathal Crimmins Architects also accompanies this submission. There are no known recorded archaeological monuments within the boundary, with the nearest protected structures located at Broadstone Station and St Brendan's.

Interaction of Foregoing

- 5.50. It is considered that any of the previously identified relatively minor impacts would not in themselves be considered significant nor would they cumulatively result in a likely significant effect on the environment.
- 5.51. Directive 2014/52/EU requires assessment of impact on climate change under each of the EIA/EIAR chapter headings. It is considered that there are no likely significant effects on the environment in terms of each of the chapter headings, individually or cumulatively.

Type and Characteristics of Potential Impacts

Could the type and characteristics of the magnitude and/or extent of the impact (for example on a geographical area and/or size of the population likely to be affected) be considered to be likely to cause significant effects on the environment?

- 5.52. The proposed development is located in an urban context. The proposed uses are consistent with land in such a location and represent a high quality and more compatible land use to that currently existing at the site. The works during the construction phase may have a minor impact on the immediate area; however, neighbouring residential development is sufficiently set back from site boundaries for these impacts to be reduced.
- 5.53. The works during construction or the operational phase are not of such a scale or extent that would be considered to be likely to cause significant effects on the environment in the geographic area or on any considerable quantum of the population in the vicinity.

Could the type and characteristics of the transboundary nature of the impact be considered to be likely to cause significant effects on the environment?

- 5.54. Any minor impacts will be contained in the immediate vicinity of the site. The subject lands are not located on any geographical or other boundary of relevance to assessment of likely significant effects on the environment.

Could the type and characteristics of the intensity and complexity of the impact be considered to be likely to cause significant effects on the environment?

- 5.55. The proposed development is not of any significant intensity or complexity such that would be likely to cause significant effects on the environment.

Could the type and characteristics of the probability of the impact be considered to be likely to cause significant effects on the environment?

- 5.56. It is likely that the minor impact of noise and pollution during the construction phase will occur, however construction works in an urban environment are entirely normal and working hours will be limited generally to hours set by condition or as otherwise agreed. All works carried out will be done so in accordance with the content management plans submitted alongside this request for pre-application consultation.

Could the type and characteristics of the expected onset, duration, frequency and reversibility of the impact be likely to cause significant effects on the environment?

- 5.57. Any of the minor impacts identified would occur during the construction phase, there are no significant negative impacts considered to occur during the operational phase as the frequency of vehicular travel to and from the site on a daily basis will be significantly reduced to that at present. The frequency will vary throughout the construction phase; however, the impact is still not considered to be significant. The minor impacts will be temporary so will be reversible. The construction of the development would be on industrial land and the development would be reversible similar its present state.

Could the type and characteristics of the cumulation of the impact with the impact of other existing and/or approved projects be likely to cause significant effects on the environment?

- 5.58. The subject site is zoned land designated for residential use. Student accommodation falls under this use and is therefore considered acceptable at the location. The development and regeneration of land is to be expected in an urban context. The scale of the proposed scheme and any other permitted schemes in the vicinity are not such that the characteristic of any potential impacts in culmination with each other are likely to cause significant effects on the environment. This has been verified by the Appropriate Assessment and Ecological Impact Statement carried out by Openfield which accompany this submission.

Could the type and characteristics of the possibility of effectively reducing the impact be likely to cause significant effects on the environment?

- 5.59. There are no significant mitigations measures or methods to be undertaken in order to reduce likely significant effects on the environment in order to complete the proposed scheme. One 'moderate negative' impact is identified by the Ecological Impact Statement, advising demolition works to be carried out outside nesting season due to the presence of a bird's nest on site.
- 5.60. Any mitigations measures to manage noise, dust and/or pollution during the construction and operational phases are subject to standard policies and practices. Please refer to associated Demolition & Construction Waste Management Plan prepared by AWN Consulting Engineers for full details.

6.0 SUMMARY & CONCLUSIONS

- 6.1. This Environmental Report has been prepared to accompany the Strategic Housing Development Pre-Application Consultation Request to An Bord Pleanála for the development of 289 no. student accommodation bed spaces at HJ Nolan Seafood Limited, Rathdown Road, Dublin 7.
- 6.2. The report has assessed the potential impact of the proposed development on the environment in response to Section 6 of the pre-application consultation application form. The proposed development is substantially below the thresholds of a mandatory EIAR. The screening exercise has been completed in this report and the methodology used has been informed by the available guidance, legislation and directives.
- 6.3. It is considered that a sub threshold EIAR is not required for the proposed mixed-use development for the following summation of the reasons set out in this screening exercise:
- The proposal falls significantly below the thresholds of Schedule 5 of the Planning and Development Regulations 2001 (as amended);
 - The site makes optimum use of a brownfield land resource and utilises existing servicing provision;
 - The development will be connected to public services such as water, foul and storm sewers;

- The site will not be directly hydrologically connected to any protected environmental sites. Surface water is to be directed through the public surface water system which enters Dublin Bay. Surface water will be subject to oil and hydrocarbon filters and attenuated in the proposed surface water system for the proposed scheme;
- The proposed drainage strategy will contribute to improved retention of surface water on site;
- Standard construction practices can be employed to mitigate any risk of noise, dust or pollution;
- No identified impact in this screening exercise, cumulatively or individually is considered to likely cause significant effects on the environment.

6.4. In conclusion, a Screening Report for Appropriate Assessment and Ecological Impact Report has been prepared by Openfield Ecological Services. The AA Screening Report concluded that *'significant effects are not likely to arise, either alone or in combination with other plans or projects that will result in significant effects to the integrity of the Natura 2000 network'*. The ecological reports also note that *'no significant effects to flora and fauna are predicted to arise from this development'*, subject to the recommended mitigation measures being carried out.

Appendix 1

Location of Designated Environmental Sites within 2km Radius of Subject Site

