



THORNTON O'CONNOR
TOWN PLANNING

Environmental Report

Planning Application

In respect of a Student Accommodation Development on a site
at:

Our Lady's Grove
Goatstown
Goatstown Road
Dublin 14

Submitted on Behalf of
Colbeam Limited

February 2021

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1.0 INTRODUCTION

Thornton O'Connor Town Planning¹ in association Stephen Marshall (Urbanism) Limited², DBFL Consulting Engineers Limited³, The Big Space Landscape Architecture⁴, The Tree File Limited⁵, AWN Consulting Limited⁶, 3D Design Bureau⁷, Scott Cawley Limited⁸ and Axiseng⁹ have been appointed by Colbeam Limited¹⁰ to prepare this Planning Application in respect of a proposed Student Accommodation development on a site at Our Lady's Grove (which includes an existing childcare facility 'The Grove After School Care', Our Lady's Grove, Goatstown, Dublin 14, D14 V290 and D14 N8C2), Goatstown Road, Goatstown, Dublin 14.

This Report has been prepared to address Section 5(5)(iii) of the *Planning and Development (Housing) and Residential Tenancies Act, 2016*, which states that any Strategic Housing Development Planning Application to the Board should include 'a *brief assessment of the nature and purpose of the development and of its possible effects on the environment*'.

This Report is intended to be read in conjunction with the Planning Report, Statement of Consistency and all other plans and reports that accompany this application, which provide a detailed overview of the nature and purpose of the proposed development and detail the relevant environmental considerations of relevant technical disciplines.

This document is intended as a summary review of the outputs of preliminary scoping carried out on the proposed development on possible effects on the environment and detail targeted measures to address any matters potential impacts.

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2.0 SITE DESCRIPTION

2.1 Site Location

The subject site, which measures c. 2.12 Ha (21,218 sq m) is located along the western side of the R-825 Goatstown Road and approximately 5km south of Dublin city centre.

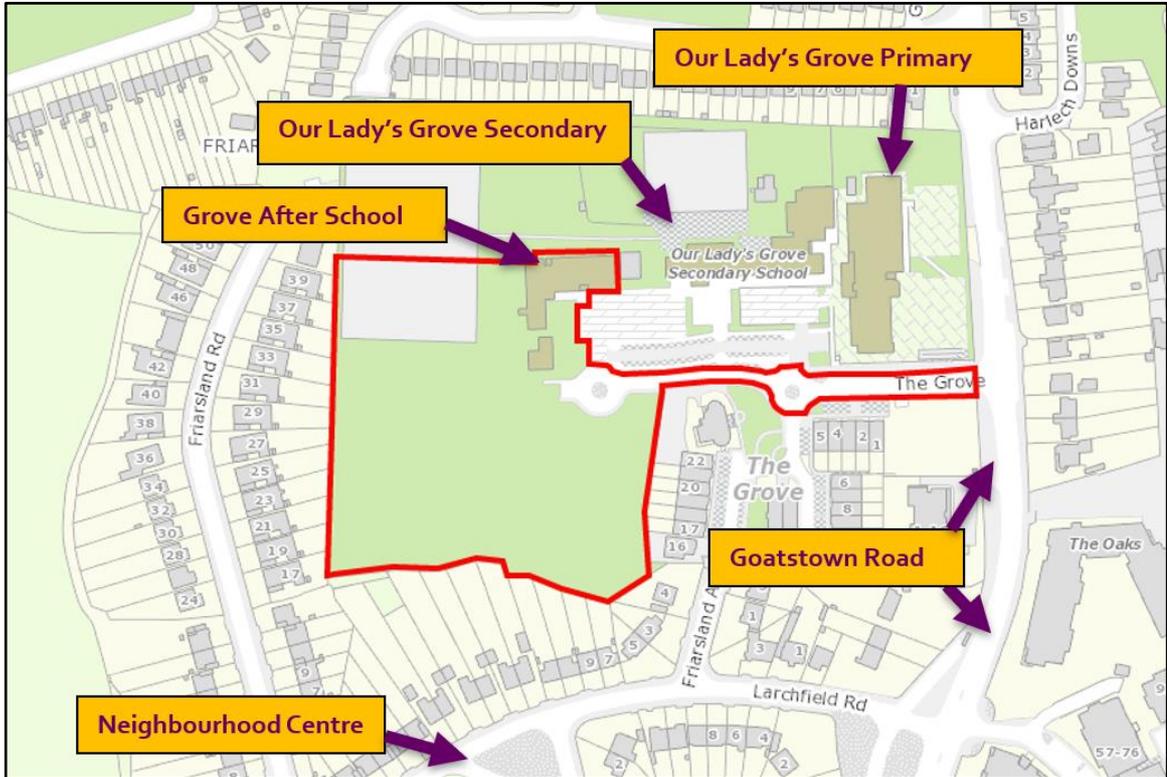


Figure 2.1: Map Indicating the Location of the Subject Site

Source: Myplan.ie (Annotated by Thornton O'Connor Town Planning, 2020)

The subject site includes an internal circulation road which connects the Goatstown Road with Our Lady's Grove Primary and Secondary School and a childcare facility known as 'Goatstown After School'.

The subject site is predominantly comprised of greenfield lands but also includes the Goatstown Afterschool premises. The subject site also contains an existing roundabout which connects to the internal roadway that leads to the Goatstown Road.

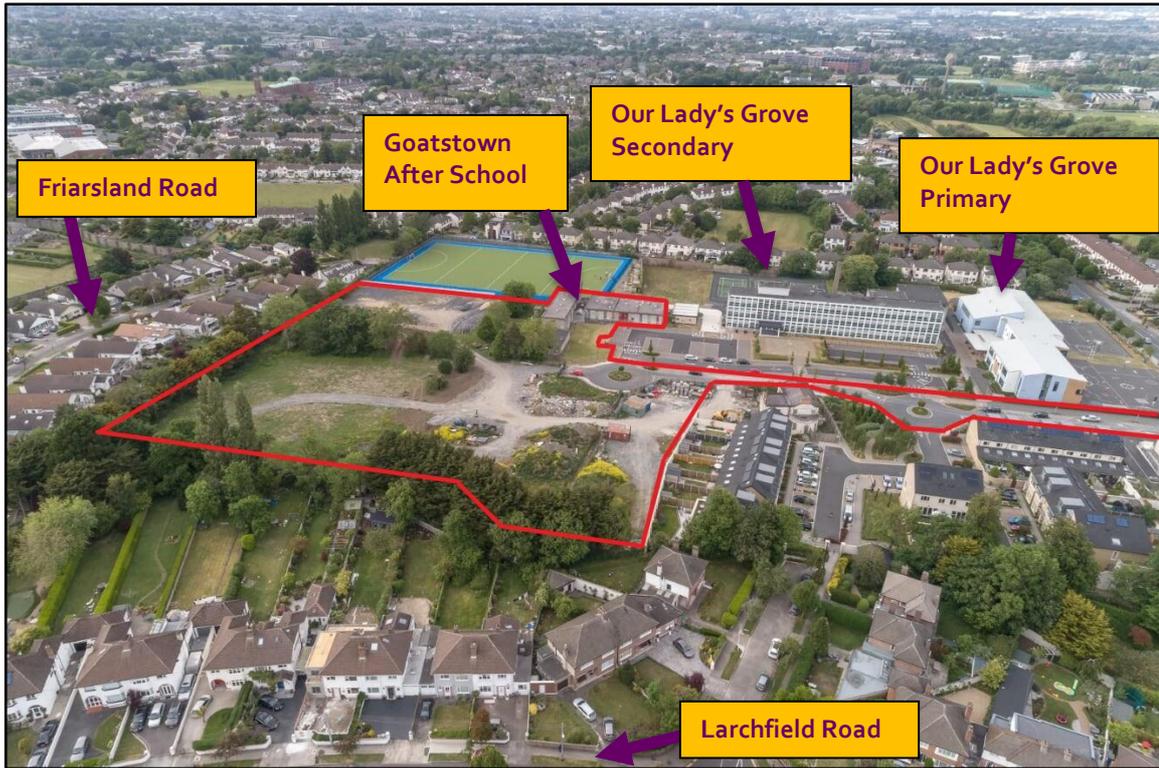


Figure 2.2: Aerial View of the Subject Site and Surrounding Context

Source: Google Maps (Annotated by Thornton O'Connor Town Planning, 2020)

2.2 Site Context

The surrounding context of the subject site is generally characterised by established low-density residential dwellings. The site is bounded to the west and south by a mix of 2 No. storey and single storey houses along Friarsland Road and Larchfield Road, with their rear gardens directly abutting the site boundary. There is a recently constructed residential development known as 'The Grove' located along the eastern boundary of the subject site, which is comprised of 41 No. units of apartments, duplexes and houses arranged in five terraced blocks each with a height of 3 No. storeys. The north eastern and northern boundaries of the subject site directly adjoin the lands of Our Lady's Grove Secondary School.

The northern redline boundary of the subject site previously dissected a hockey pitch belonging to the adjacent secondary school. However, the re-orientation of this pitch, to run parallel to the northern site boundary, was granted permission under DLRCC Reg. Ref. D18A/0387 and ABP Ref. PLo6D.302898. As such the hockey pitch has been recently re-aligned and no longer dissects the redline boundary. Further information in relation to this recent grant of permission is outlined in the enclosed Planning Report prepared by Thornton O'Connor Town Planning.

There is a neighbourhood centre located within a 5-minute walk (c. 350m) to the south of the subject site at the junction of Farmhill Road and Larchfield Road. The neighbourhood centre is comprised of approximately 9 No. commercial units including, but not limited to a local shop with a delicatessen and post office, a café, a pharmacy, a health clinic, a dentist, a beauty salon, a hair salon and a clothes shop. The neighbourhood centre also includes an estate agent, a solicitor's office and an accountancy firm.

2.3 Zoning Objective

The subject site is zoned *Objective 'A'* in the *Dún Laoghaire Rathdown County Development Plan 2016 – 2022* where the objective is 'to protect and-or improve residential amenity' (see Figure 2.3 below).

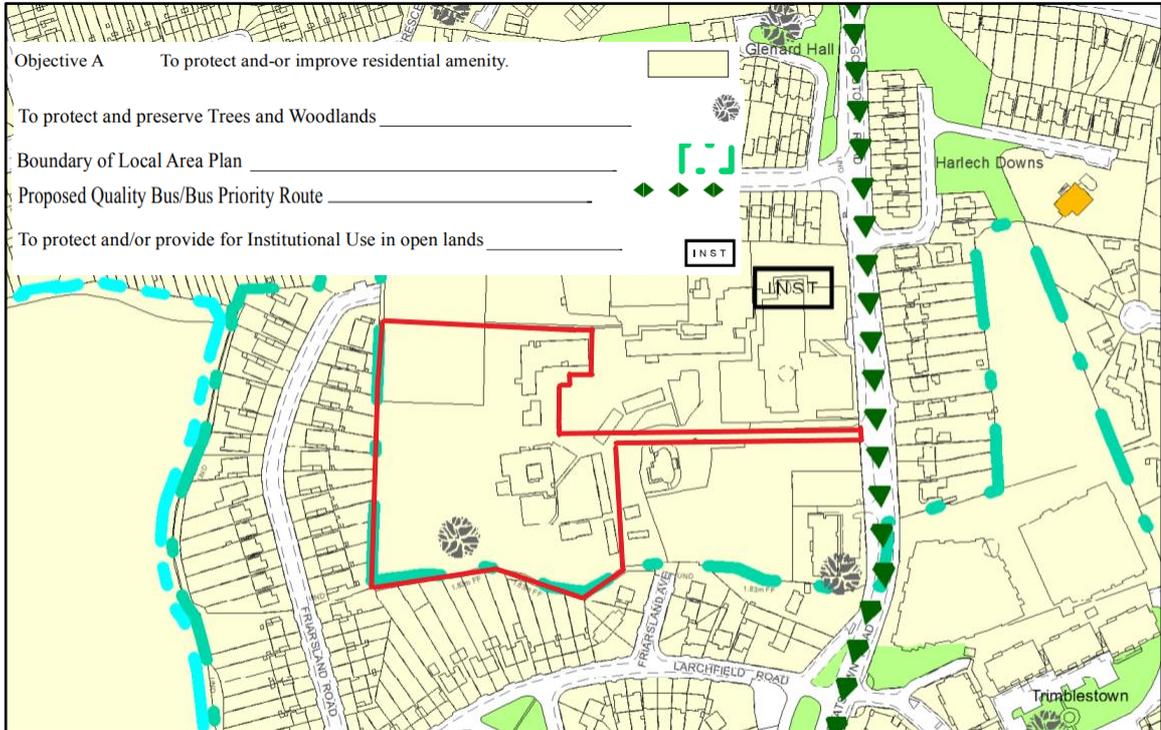


Figure 2.3: Zoning Map with the Subject Site Indicated.

Source: *Dún Laoghaire Rathdown County Development Plan 2016-2022*. Annotated by Thornton O'Connor Town Planning.

Land uses that are 'Permitted in Principle' and 'Open for Consideration' on lands zoned 'Objective A' include, but are not limited to:

Permitted in Principle

Assisted living accommodation; Open Space; Public Services; Residential; Residential Institution; and Traveller Accommodation.

Open for Consideration

Carpark; Community Facility; Childcare Service; Education; and Neighbourhood Sports Facility. Student Accommodation is considered to be a residential land use, as such, the proposed development fully complies with the zoning objective of the site.

'Residential' development is permitted in principle on lands zoned Objective A. Student Accommodation is considered to be a residential land use, as such, the proposed development fully complies with the zoning objective of the site.

As detailed in Section 7.3.1 of the Planning Report prepared by Thornton O'Connor Town Planning, the recently published *Draft Dun Laoghaire Rathdown Development Plan 2022-2028* proposes to rezone the subject lands as to Objective 'F', where the stated objective is 'to preserve and provide for open space with ancillary active recreational amenities'. The 'INST' designation



continues to apply to the subject site in the *Draft Plan*, however the objective '*to protect and preserve trees and woodlands*' has been removed. As extensively detailed in the Planning Report, the proposed rezoning to open space was not supported by the Executive and ensued following Councillor's motions. The Board should note that the proposed rezoning of the subject lands to open space will be vigorously challenged by the Applicant during the public consultation stage of the *Draft Plan*. We further note that this Planning Application will be assessed in the context of the current *Dun Laoghaire Rathdown Development Plan 2016-2022* as the *Dun Laoghaire Rathdown Development Plan 2022-2028* is not due to be adopted until 2022.

3.0 SUMMARY OF THE PROPOSED DEVELOPMENT

The subject planning application is categorised as a Strategic Housing Development as defined in Section 3 of the *Planning and Development (Housing) and Residential Tenancies Act 2016* (amended July 2018), which states that Strategic Housing Development means:

- 'a) *the development of 100 or more houses on land zoned for residential use for a mixture of residential and other uses,*
- b) ***the development of student accommodation units which, when combined, contain 200 or more bedspaces, on land the zoning of which facilitates the provision of student accommodation or a mixture of student accommodation and other uses thereon.***
- c) *development that includes developments of the type referred to in paragraph a) and of the type referred to in paragraph b), or*
- d) *the alteration of an existing planning permission granted under section 34 (other than under subsection (3A)) where the proposed alteration relates to development specified in paragraph a), b) or c).'* [Our Emphasis]

The development will principally consist of: the construction of a Student Accommodation development containing 698 No. bedspaces with associated facilities located in 8 No blocks, which range in height from part 3 No. storeys to part 6 No. storeys over part lower ground floor level (7 No. storeys as viewed from an internal courtyard). Some 679 No. bedspaces are provided in 99 No. clusters ranging in size from 5 No. bedspaces to 8 No. bedspaces, each with a communal Living/Kitchen/Dining room. The remaining 19 No. bedspaces are accessible studios. The development includes the provision of communal residential amenity space at lower ground floor level (349 sq m) including the provision of a movie room (108 sq m), a music room (42 sq m) and a laundry (37 sq m); communal residential amenity space (1,356 sq m) at ground floor level including the provision of a gym (228 sq m), reception desk and seating area (173 sq m), a common room (338 sq m), a study space (104 sq m), a library (64 sq m), a yoga studio (74 sq m), a prayer room (33 sq m) and group dining (33 sq m).

The development also includes staff and administrative facilities (195 sq m); 9 No. car parking spaces; 4 No. motorcycle parking spaces; 860 No. cycle parking spaces; refuse stores; signage; an ESB substation and switchroom; boundary treatments; green roofs; PV panels; hard and soft landscaping; plant; lighting; and all other associated site works above and below ground. The development includes the demolition of part of the Goatstown Afterschool building (558 sq m) and the construction of a new external wall to the remaining ope, in addition to the demolition of a prefabricated structure adjacent to the Afterschool building (161 sq m).

The subject site is eminently suitable for Student Accommodation given the proximity to University College Dublin, which is located approximately 850m to the north west and is readily accessible by foot or bicycle.

North Block (119 No. Bedspaces)

The North Block is a part 5 to part 6 No. storey over lower ground level block located in the north western corner of the subject site, adjacent to the hockey pitch associated with Our Lady's Grove School. The North Block contains 119 No. bedspaces provided in clusters as follows:

- 9 No. bedspaces divided into two clusters, each with a communal living/kitchen/dining area at lower ground floor level.
- 20 No. bedspaces divided into three clusters each with a communal living/kitchen/dining area at ground floor level.
- 20 No. bedspaces divided into three clusters each with a communal living/kitchen/dining area at first floor level.
- 20 No. bedspaces divided into three clusters each with a communal living/kitchen/dining area at second floor level.
- 20 No. bedspaces divided into three clusters each with a communal living/kitchen/dining area at third floor level.
- 20 No. bedspaces divided into three clusters each with a communal living/kitchen/dining area at fourth floor level.
- 10 No. bedspaces divided into two clusters each with a communal living/kitchen/dining area at fifth floor level.

Middle Block (168 No. Bedspaces)

The Middle Block is a part 5 No. storey to part 6 No. storey over lower ground level block located in the centre of the subject site comprised of 167 No. bedspaces provided in clusters and 1 No. accessible studio and ancillary facilities as follows:

- At lower ground floor level: a bicycle store; a music room; a movie room; a laundry; and 11 No. bedspaces divided into two clusters each containing a communal living/kitchen/dining area.
- A reception desk and seating area and a main common room at ground floor level and 18 No. bedspaces divided into three clusters each containing a communal living/kitchen/dining area.
- 30 No. bedspaces divided into four clusters, each containing a communal living /kitchen/dining area at first floor level.
- 30 No. bedspaces divided into four clusters, each containing a communal living /kitchen/dining area at second floor level.
- 30 No. bedspaces divided into four clusters, each containing a communal living /kitchen/dining area at third floor level.
- 30 No. bedspaces divided into four clusters, each containing a communal living /kitchen/dining area at fourth floor level.
- 18 No. bedspaces divided into three clusters, each containing a communal living /kitchen/dining area and 1 No. accessible studio at fifth floor level.

South Block (159 No. Bedspaces)

The South Block is a part 5 No. to part 6 No. storey over lower ground block comprised of 18 No. accessible studios and 141 No. bedspaces provided in clusters and ancillary facilities as follows:

- A plant room; staff changing rooms and toilet facilities; store rooms and an electrical room at lower ground floor level.
- A study space; a gym; a meeting room; a prayer room; a yoga studio; an administration and managers office; and a communal dining room at ground floor level.
- 4 No accessible studios and 30 No. bedspaces divided into four clusters each with a communal living/kitchen/dining area at first floor level.
- 4 No accessible studios and 30 No. bedspaces divided into four clusters each with a communal living/kitchen/dining area at second floor level.
- 4 No accessible studios and 30 No. bedspaces divided into four clusters each with a communal living/kitchen/dining area at third floor level.
- 4 No accessible studios and 30 No. bedspaces divided into four clusters each with a communal living/kitchen/dining area at fourth floor level.
- 2 No accessible studios and 21 No. bedspaces divided into four clusters each with a communal living/kitchen/dining area at fifth floor level.

Mews Block A (56 No. Bedspaces)

Mews Block A is a 4 No. storey block located adjacent to the western boundary of the subject site and is comprised of 56 No. bedspaces provided in clusters and ancillary facilities as follows:

- 14 No. bedspaces divided into two clusters with each with a communal living/kitchen/dining area at ground floor level.
- 14 No. bedspaces divided into two clusters with each with a communal living/kitchen/dining area at first floor level.
- 14 No. bedspaces divided into two clusters with each with a communal living/kitchen/dining area at second floor level.
- 14 No. bedspaces divided into two clusters with each with a communal living/kitchen/dining area at third floor level.

Mews Block B (42 No. Bedspaces)

Mews Block B is a part 3 No. to part 4 No. storey block located in the south western corner of the subject site and is comprised of 42 No. bedspaces provided in clusters and ancillary facilities as follows:

- 12 No. bedspaces divided into two clusters each with a communal living/kitchen/dining area at ground floor level.
- 12 No. bedspaces divided into two clusters each with a communal living/kitchen/dining area at first floor level.
- 12 No. bedspaces divided into two clusters each with a communal living/kitchen/dining area at second floor level.
- 6 No. bedspaces divided into two clusters each with a communal living/kitchen/dining area at third floor level.

Mews Blocks C and D (56 No. Bedspaces x 2 = 112 No. Bedspaces)

Mews Blocks C and D, are part 3 No. to part 4 No. storey blocks located along the southern boundary of the subject site, with each containing 56 No. bedspaces provided in clusters and ancillary facilities as follows:

- 16 No. bedspaces divided into two clusters each with a communal living/kitchen/dining area at ground floor level.
- 16 No. bedspaces divided into two clusters each with a communal living/kitchen/dining area at first floor level.
- 16 No. bedspaces divided into two clusters each with a communal living/kitchen/dining area at second floor level.
- 8 No. bedspaces in a single cluster and a communal living/kitchen/dining area at third floor level.

Mews Block E (42 No. Bedspaces)

Mews Block E, which is located in the south easter corner of the subject site, is a part 3 to part 4 No. storey block containing 42 No. bedspaces provided in clusters and ancillary facilities as follows:

- 12 No. bedspaces divided into two clusters each with a communal living/kitchen/dining area at ground floor level.
- 12 No. bedspaces divided into two clusters each with a communal living/kitchen/dining area at first floor level.
- 12 No. bedspaces divided into two clusters each with a communal living/kitchen/dining area at second floor level.
- 6 No. bedspaces in a single cluster with a communal living/kitchen/dining area at third floor level.

Demolition

The proposed development includes the demolition of part of the Goatstown Afterschool building, namely a portion of the building which has fallen into disrepair (558 sq m). The existing Goatstown Afterschool buildings consist of a single storey classroom block with a 2 No. storey

accommodation block extension. It is proposed to demolish the 2 No. storey accommodation block extension which is no longer in use and has fallen into a serious state of disrepair. The demolition of this disused portion of the Goatstown Afterschool building is in the interests of the health and safety of staff and students of the facility. Following the demolition of the disused portion of the building, the Applicant will make good the façade through the construction of a new external wall to enclose the remaining ope.

In addition, a prefabricated structure (161 sq m) located to the south of the Afterschool building is proposed to be removed.

Ancillary Works

The proposed development also includes ancillary works including but not limited to signage; 9 No car parking spaces; 4 No. motorcycle parking spaces; 860 No. cycle parking spaces; hard and soft landscaping; photovoltaic panels; plant; and all associated works above and below ground.

4.0 EIA SCREENING METHODOLOGY

An Environmental Impact Assessment (EIA) is a process whereby the potential effects of development projects on the environment are assessed. The particulars of the assessment procedure are adopted through European Directives and correlate to the provisions set out in the *Planning and Development Act 2001* (as amended). An EIA is required to be carried out as part of an application whereby the proposed development exceeds the limitations of Schedule 5 of the *Planning and Development Regulations 2001* (as amended).

A Sub-Threshold EIAR is required where it is considered by the Planning Authority that the development would be likely to have a significant effect on the environment. The criteria for the assessment of sub-threshold impacts is set out in Schedule 7 of the *Planning and Development Regulations 2001* (as amended).

An assessment of the identified *direct, indirect, secondary, cumulative, short, medium, and long-term, permanent and temporary, positive and negative* effects of the proposed development during the construction and operational phases of the development is also required to be carried out in response to Schedule 6 of the *Planning and Development Regulations 2001* (as amended).

4.1 Legislation and Guidance

Schedule 5 of the *Planning and Development Regulations, 2001* (as amended) sets out the criteria for the specific development proposals which are required to be accompanied by an EIAR as per Article 93 of those same regulations.

4.2 EIA Thresholds

As the proposed development is for Student Accommodation use the most relevant assessment category of Schedule 5 is considered to be part 2, paragraph 10 (b) – *Infrastructure Projects* which identifies developments requiring EIS as;

- (i) Construction of more than 500 dwelling units.
- (ii) Construction of a car-park providing more than 400 spaces, other than a car-park provided as part of, and incidental to the primary purpose of, a development.
- (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 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.)

The proposed application contains 698 No. bedspaces of student accommodation arranged in 8 No. blocks which range in height from part 3 No. to part 6 No. storeys over part lower ground floor level (7 No. storeys as viewed from an internal courtyard).

The application site is c. 2.12 Ha and as such it does not exceed the limitations as set out above in regard to urban developments in built up areas.

It is considered that the proposed development is not required to be accompanied by an EIAR as it has been demonstrated that it does not surpass the limitations as set out in the *Planning and Development Regulations (2001), Schedule 5, Part 2, Paragraph 10 (b)* for Infrastructure projects.

4.3 Sub Threshold Projects Requiring EIA

Part 10 of the *Planning and Development Regulations, 2001* defines sub-threshold developments as 'development of a type set out in Schedule 5 which does not exceed a quantity, area or other limit specified in that Schedule in respect of the relevant class of development.'

As the proposal does not exceed the limitations of Schedule 5 as set out above, the proposed development is required to be assessed against the criteria for sub-threshold developments. The assessment will determine whether the proposal 'would or would not be likely to have a significant effect on the environment'.

Furthermore, in assessing whether the proposed development requires an EIA, regard must also be given to European Directive 2014/52/EU. The EIA Directive 2014/52/EU came into effect on the 15th of May 2014, asserting the rules for assessing the potential effects of development projects. As of the 16th May 2017, it is compulsory for member states to have due regard of the Directive in assessing whether a development proposal requires an accompanying EIA.

4.4 EIA Screening Exercise

The proposed development will be assessed against the following criteria;

- a) Characteristics of Proposed Development;
- b) Location of Proposed Development; and
- c) Characteristics of Potential Impacts.

4.4.1 Characteristics of the Proposed Development

The characteristics of the proposed development have been assessed with regards to the following criteria as set out in Annex III of Directive 2014/52/EU and Schedule 7 of the *Planning and Development Regulations, 2001 (as amended)*;

(a) The size and design of the whole project

As per Section 3.0 of this report, the proposed development principally comprises a Student Accommodation scheme containing a total of 698 No. student bed spaces, student study spaces and ancillary amenities. The development also includes minor demolition works to an afterschool building and the removal of a pre-fabricated structure. Landscaping works include the provision of a public linear park including recreational and gym equipment.

Precedent has been established at the subject site for relatively similar scale and massing to that proposed in this Planning Application, as under ABP Ref. PLo6D.304420 permission was granted by An Bord Pleanála for a residential scheme comprised of 132 No. apartment units situated in four blocks which range in height from part 3 No. to 5 No. storeys (with a greater floor to ceiling height than proposed in the subject scheme). This decision was subsequently quashed by the High Court for legal reasons following Judicial Review proceedings. However, it is important to note that in considering the issues which ultimately led to the decision to impugn, the key matters related to compliance with an 'institutional' objective that it was deemed by the Court to apply to the site. The subject application has fully respected the 'institutional' objective pertaining to the lands.

This Planning Application is submitted in conjunction with a Planning Report prepared by Thornton O'Connor Town Planning and a Design Statement prepared by Stephen Marshall Urbanism Limited.

The Appropriate Assessment Screening Report and Ecological Impact Statement prepared by Scott Cawley Limited has found that the project alone or in combination with other projects, is not likely to have significant effects on the Natura 2000 Network or any of the flora and fauna in the surrounding area.

(b) Cumulation with other existing and/or approved projects

The proposed residential use of the site is consistent with the zoning as per the adopted *Dún Laoghaire Rathdown County Council Development Plan 2016-2022*. The application site is located within 'Objective 'A' zoned lands where the objective is 'to protect and-or improve residential amenity'.

A search of the online planning application database of both Dún Laoghaire Rathdown County Council and An Bord Pleanála found that there are no current or determined applications as of 25th January 2021, which may have a cumulative negative impact on the area. In this regard, we have considered the permitted and completed development for the realignment of the hockey pitch to the north of the subject site (D18A/0387 / ABP Ref. PLo6D.302898), the permitted applications for changing rooms for the adjacent Secondary School (D20A/0192 and D20A/0198) and the as-lodged application for a student accommodation development at the former Victor Motors site, Goatstown Road, Dublin 14 (Ref. PLo6D.308353). The adjacent hockey pitch and changing facilities developments are relatively minor in nature. The proposed 239 No. bedspace student scheme, if granted, on Goatstown Road includes appropriate mitigation measures to ensure that it will not have a negative impact on the area.

It is anticipated that the cumulative impact of proposed development would not be likely to have a significant effect on the environment in combination with other existing and/or approved projects.

(c) The use of natural resources, in particular land, soil, water and biodiversity

The demolition and construction phases of proposed development on an infill site will involve the consumption of natural energy sources, the movement of soil and the use of water and other various raw materials. However, it is anticipated that throughout the demolition, construction and operation of the scheme, the development would not result in the use of large amounts of natural resources greater than that associated with comparable developments or to the extent that would have a significant impact on the environment.

A Hydrological and Hydrogeological Assessment prepared by AWN Consulting is enclosed with this Planning Application. The reports concludes that:

'There is no direct source pathway linkage between the proposed development site and open water (i.e. Dodder Catchment or Dublin Bay). It is concluded that there is also no resultant indirect source pathway linkage from the proposed development through public sewers which could result in any change to the current water regime (water quality or quantity) and open water as defined.'

It is anticipated that the proposed development would not be likely to have a significant effect on the environment.

(d) **The production of waste**

It is acknowledged that waste will be generated during the demolition, construction and operation of the development. An Operational Waste Management Plan ('OWMP') has been prepared by AWN Consulting Limited, a copy of which is enclosed with this Planning Application. The OWMP estimates that the scheme will generate a waste volume of 45.68 m³/week.

The OWMP also outlines the measures which have been put in place to avoid and/or mitigate against any potential impacts. The Operational Waste Management Plan concludes that:

'In summary, this OWMP presents a waste strategy that complies with all legal requirements, waste policies and best practice guidelines and demonstrates that the required storage areas have been incorporated into the design of the development.

Implementation of this OWMP will ensure a high level of recycling, reuse and recovery at the development. All recyclable materials will be segregated at source to reduce waste contractor costs and ensure maximum diversion of materials from landfill, thus achieving the targets set out in the EMR Waste Management Plan 2015 – 2021.

Adherence to this plan will also ensure that waste management at the development is carried out in accordance with the requirements outlined in the DLRCC Guidance Notes for Waste Management in Residential & Commercial Developments and the DLRCC Waste Bye-Laws.'

It is anticipated that the proposed development would not be likely to have a significant effect on the environment.

(e) **Pollution and nuisances**

As with all developments, there will be potential for dust and noise produced during the construction period. However, the impact of the construction period will be temporary in nature and less significant than the operational stage the subject scheme.

Construction noise will be mitigated by ensuring that work only takes place during the permitted hours of construction as prescribed in the planning conditions.

As detailed in the Construction Management Plan prepared by DBFL Consulting Engineers, a Dust Management Programme encompassing monitoring, management and suppression/abatement techniques will be incorporated into the construction works, including but not limited to the following:

- Construction techniques shall minimise dust release into the air.
- Spray exposed site haul roads during dry and / or windy weather.
- Provide wheel washing facilities at all exit points.
- Provide tarpaulins over all unacceptable excavated materials being carted off site.
- Control vehicle speeds and impose speed restrictions, (speed can mobilise dust).
- Sweep hard surface roads, inside and outside the site, to ensure roads are kept clear of debris, soil or other material.
- Locate any stockpiles away from sensitive receptors (i.e. receptors sensitive to dust release).

It is anticipated that the pollution and nuisances arising from the development would not be likely to have a significant effect on the environment.

(f) 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

This is not a site which poses a major accident hazard as defined in the Seveso Directive. The main risk is a risk of workplace accidents. This risk is not major. It is dealt with under the Safety Health and Welfare at Work Act. The site manager will be responsible for complying with its terms. The risk is not considered significant or likely. There is also a risk that material used in the course of construction might be spilled and might discharge to water courses. This issue is dealt with in relation to water pollution. It is not considered that it would amount to a major accident.

The lands have been zoned under the *Dún Laoghaire Rathdown County Development Plan 2016-2022* and therefore have been subject to both a Strategic Environmental Assessment and a Strategic Flood Risk Assessment.

It is anticipated that the proposed development would not be likely to have a significant effect on the environment through risk of major accidents or disasters.

(g) The risks to human health (for example due to water contamination or air pollution)

There are no foreseen risks to human health, as noted appropriate noise and pollution (including water) mitigation measures are to be put in place during the demolition and construction phases of the development. The proposed development is to be connected to public foul and storm water systems. There are no foreseen risks to human health during the operation of the development.

It is anticipated that the proposed development would not be likely to have a significant effect on the environment in respect of risk to human health.

4.4.2 Location of Proposed Development

Schedule 7 of the *Planning and Development Regulations 2001 (as amended)* require an assessment of the environmental sensitivity of the geographical areas likely to be affected by proposed development, having regard to;

(a) The existing and approved land use;

The proposed development is located on suitably zoned lands and is ideally suited to the proposed student accommodation use owing to the proximity to University College Dublin and the institutional nature of the lands adjacent to an existing educational campus. It is considered that the proposed development would not be likely to have a significant effect on the environment in comparison to the existing land-use as an underutilised and undeveloped infill site that includes trees and wildlife.

(b) The relative abundance, quality and regenerative capacity of natural resources in the area;

The absorption capacity of the natural environment, paying particular attention to the following areas:

(i) Wetlands, Riparian Areas and River Mouths;

The Flood Risk Assessment prepared by DBFL Engineering Consultants Limited, a copy of which is enclosed with this Planning Application, notes that there has been no history of flooding on the subject site. The risk of flooding to the subject site can therefore be rated as very low.

A Hydrological and Hydrogeological Assessment prepared by AWN Consulting is enclosed with this Planning Application. The report concludes that:

'There is no direct source pathway linkage between the proposed development site and open water (i.e. Dodder Catchment or Dublin Bay). It is concluded that there is also no resultant indirect source pathway linkage from the proposed development through public sewers which could result in any change to the current water regime (water quality or quantity) and open water as defined.'

It is therefore considered that the development will not be likely to lead to significant effects on the absorption capacity of any waterbody.

(ii) Coastal Zones and The Marine Environment;

The application site is not located in close proximity to any coastal zone and/or marine environment.

It is therefore considered that the development will not be likely to lead to significant effects on the absorption capacity of any coastal zone and the marine environment.

(ii) Mountain and Forest Areas;

The application site is not located in close proximity to any mountainous or forest areas.

It is therefore considered that the development will not be likely to lead to significant effects on the absorption capacity of any mountain and forest areas.

(iii) Nature Reserve and Parks;

An online search of the National Parks and Wildlife Service database found that there are no nature reserves in close proximity to the application site.

It is considered that the development will not be likely to lead to significant environmental effects on any nature reserves and therefore will not impact on the absorption capacity of the natural environment.

(iv) Natura 2000 Areas Designated Pursuant To 79/409/EEC and 92/43/EEC;

The site is not located within any statutory designated areas. An Appropriate Assessment (AA) Screening Report has been prepared by Scott Cawley Limited a copy of which is enclosed with this Planning Application. The AA screening process concluded that there will be no significant effects for any European sites.

'Following an examination, analysis and evaluation of the best available information, and applying the precautionary principle, it can be concluded that the possibility of any significant effects on any European sites, whether arising from the project alone or in combination with other plans and projects, can be excluded.'

It is considered that the development will not be likely to lead to significant effects on the environment.

(v) 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;

There are no records of the application site being located in an area as described above.

It is considered that the development will not be likely to lead to significant effects on the environment.

(vi) Densely Populated Areas;

As per the *Dún Laoghaire Rathdown County Development Plan 2016-2022*, the application site is located within 'Objective 'A' zoned lands where the objective is 'to protect and-or improve residential amenity'.

Residential development (of which student accommodation is a typology) is 'permitted in principle' on the subject site subject to compliance with an 'Institutional' Objective that also applies to the site.

The development would result in the site becoming densely populated. This is considered appropriate because of the site's proximity to UCD, the demand for student accommodation, the fact that students will spend much of their time on the UCD campus, and the freeing up of accommodation previously rented to students which will become available to address the housing shortage. Within the context of a city of a million inhabitants, this is a logical and minor step. It is a minor change and is not significant in the overall settlement pattern."

(vii) Landscapes and Sites of Historical, Cultural/Archaeological Significance;

There are no recorded Protected Structures on the subject site.

An online search of the National Inventory of Architectural Heritage database found that the nearest recorded buildings of architectural heritage are located at the Central Mental Hospital, c. 250m to the west of the subject site. The recorded structures include an outbuilding (Reg No. 60220005), a chimney (Reg No. 6022004), a hospital/infirmary (Reg. No. 60220003), a church/chapel (Reg. 60220002) and the main hospital building (Reg. No. 60220001).

It is not considered that the proposed development will negatively impact on the setting of any Protected Structure or the absorption of the natural environment in regard to landscapes and sites of historical, cultural and archaeological significance.

4.4.3 Type and Characteristics of Potential Impacts

The primary impacts of the development identified at Sections 4.4.1 and 4.4.2 of this report (Characteristics of the Development and the Location of the Site) refer to the increase in noise and dust and production of waste as result of the demolition, construction and operational phases. The use of the land and the risk of accidents have been recognised as not being potential impacts during the operation of the development. Although there are no likely significant impacts envisaged, in accordance with the Annex III of Directive 2014/52/EU, the impacts identified have been assessed further in regard to the type and characteristics of potential impacts.

(a) The magnitude and spatial extent of the impact.

As noted throughout this report, the proposed development is consistent with the designated land use as per the *Dún Laoghaire Rathdown County Development Plan 2016-2022*. The demolition and construction works are expected to have minimal impacts over a short-term period on the immediate area surrounding the application site.

This Planning Application is accompanied by a Landscape and Visual Impact Assessment prepared by The Big Space Landscape Architecture. The Assessment examined 14 No. verified views of the Proposed Development and the potential visual impact on the surrounding area. Of the 14 No. views assessed only 3 No. found that the proposed development would result in a 'moderate and negative' impact on the surrounding area, with this impact reducing to 'slight and negative' over time as vegetation matures. An assessment of the remaining views found that the proposed development would have a slight, not significant, or imperceptible visual impact on the surrounding area.

This Planning Application is also accompanied by a Daylight Sunlight Assessment prepared by 3D Design Bureau. The assessment concludes that:

'This assessment has studied the effect the proposed development would have on the level of daylight and sunlight received by the neighbouring residential properties that are in close proximity to the proposed development. No existing properties will experience an unacceptable drop in levels of daylight or sunlight. Finally, future occupants will enjoy good levels of daylight within all of the proposed units and will have access to 2 amenity areas that are capable of receiving good levels of sunlight year round, and two proposed amenity areas which are capable of receiving good levels off sunlight during the summer months'.

The development works are not considered to be to an extent which would have a likely significant effect on the surrounding environment.

(b) The nature of the impact.

The proposed scheme will result in short term impacts during the demolition and construction phases of the development, such as temporary traffic congestion during the demolition and construction period and temporary noise and dust pollution.

The impacts of the development are not considered to be any greater than that associated with typical developments. There are no significant negative impacts likely to arise.

(c) The transboundary nature of the impact.

The proposed development is not considered to negatively impact on any sites in the surrounding vicinity beyond directly adjoining neighbours during the temporary construction period. The application site is not located within any designated areas.

This Planning Application is supported by the submission of an Appropriate Assessment screening. As noted at Sections 4.4.2 (a) and 4.4.2(b), it has been established that the proposed development would not have potential for significant effects on any European sites.

There are no anticipated significant likely negative impacts on the environment.

(d) The intensity and complexity of the impact.

The potential impacts identified at Section 5.0 are not considered to result in an intensity or complexity that would have a long-term impact on the environment. The identified potential impacts as detailed in the technical reports will be moderate and managed throughout the development.

There are no anticipated significant likely negative impacts on the environment.

(e) The expected onset, duration, frequency and reversibility of the impact.

The potential impacts of the demolition and construction phases of the development which are identified at Section 5.0 are considered to be short-term. It is acknowledged that the extent of these impacts will vary throughout the development process, however it is not anticipated these impacts on the environment would be significant.

There are no significant negative impacts which are likely to occur during the operational phases of the proposed residential development.

(g) The cumulation of the impact with the impact of other existing and/or approved projects and the possibility of effectively reducing the impact

A search of the online planning application database of both Dún Laoghaire Rathdown County Council and An Bord Pleanála found that there are no current or determined applications as of 25th January 2021 which may have a cumulative negative impact on the area. In this regard, we have considered the permitted and completed development for the realignment of the hockey pitch to the north of the subject site (D18A/0387 / ABP Ref. PLo6D.302898), the permitted applications for changing rooms for the adjacent Secondary School (D20A/0192 and D20A/0198) and the as-lodged application for a student accommodation development at the Victor Motors site, Goatstown Road, Dublin 14 (Ref. PLo6D.308353). The adjacent hockey pitch and changing facilities developments are relatively minor in nature. The proposed 239 No. bedspace student scheme on Goatstown Road includes appropriate mitigation measures to ensure that it will not have a negative impact on the area if permission is granted for the development.

(h) The possibility of effectively reducing the impact.

The proposed development will undertake all necessary and appropriate mitigation measures to avoid or limit any likely significant effects on the environment that may arise.

The application is supported by a Construction Management Plan prepared by DBFL Consulting Engineers and an Operational Waste Management Plan prepared by AWN Consulting Limited.

Appropriate mitigation measures will be taken to avoid any likely significant effects on the environment that may arise, thus effectively reducing the impact.

5.0 POSSIBLE EFFECTS ON THE ENVIRONMENT

The following section briefly assess the proposed development in the context of environmental topics referred to in Article 3 of Directive 2014/52/EU.

5.1 Human

The proposed development, consisting of 698 No. Student Accommodation bedspaces and ancillary facilities responds directly to the housing need for student accommodation.

The proposed development will achieve one of the key action areas outlined in the report entitled *Action Plan for Housing and Homelessness* (July, 2016) issued by the Minister for Housing, Planning, Community and Local Government in July 2016, namely to '*support greater provision of student accommodation*' which will help to ease the pressure on the private rental market.

The subject site is extremely well positioned to provide high quality student accommodation bedspaces with excellent ancillary facilities in close proximity to University College Dublin. The provision of 698 No. bedspaces will not only contribute towards addressing the shortfall in student accommodation but in turn will lead to the release of private rented accommodation, which is in critical demand in the area. This release of private rented accommodation to the market will contribute positively towards a solution for the current national housing crisis.

The proposed development is considered to be consistent with National, Regional and Local planning policy and guidance, as set out within the accompanying Statement of Consistency Report.

As identified throughout Section 4.4 of this report, it is established that there will be short term impacts at varying levels during the demolition and construction phases of the development. As set out in the accompanying Construction and Environment Management Plan and Operational Waste Management Plan, appropriate mitigation measures will be put in place.

There are no projected long-term impacts of the development, it is noted that the development proposes a significantly reduced level of car parking provision, thus encouraging sustainable modes of transport.

The proposed development has had due regard for water and waste infrastructure throughout the concept and design process. It has been established that the water and waste infrastructure is capable of meeting the demand created by the development. A Site-Specific Flood Risk Assessment has been prepared by DBFL Consulting Engineers and is enclosed with this application.

5.2 Biodiversity (Flora and Fauna)

The subject site is not located within any Special Protection Areas (SPA) or National Heritage Areas. There are no site-specific designations in regard to flora and fauna and there is no vegetation of value located on site. Nonetheless, an AA Screening Report and Ecological Impact Statement has been prepared by Scott Cawley Limited and is submitted in support of this Planning Application.

The AA screening process concluded that there will be no significant effects for any European sites.

'Following an examination, analysis and evaluation of the best available information, and applying the precautionary principle, it can be concluded that the possibility of any significant effects on any European sites, whether arising from the project alone or in combination with other plans and projects, can be excluded.'

The Ecological Impact Assessment states:

'The proposed development does have the potential to result in significant negative effects on habitats (treelines), breeding birds and bats at local geographic levels. Following the implementation of mitigation measures, no residual impacts on any key ecological receptors is predicted.'

The report further notes that

'In addition, the landscape design will ensure that the biodiversity value of the habitats to be retained and created as part of the proposed development are maximised, enhancing the site biodiversity above the existing level.'

It is considered that the development will not be likely to lead to significant effects on the environment.

5-3 Environmental Geography (Soil, Water, Air, Climatic Factors and the Landscape)

5-3.1 Soil

It is anticipated that the proposal would not be likely to impact on the environment in regard to soil and/or geology.

5-3.2 Water

The application site is located within the Liffey and Dublin Bay Water Framework Directive (WFD) catchment area as identified on the EPAs Water Regions online map.

As noted at Section 4.4.1 (c), it is not anticipated that the use of natural resources such as water at the site would be greater than that of ordinary use or have a significant impact on the environment.

The application site is located within Flood Zone C as per the *Dún Laoghaire Rathdown County Development Plan 2016-2022*. A Site-Specific Flood Risk Assessment prepared by DBFL Consulting Engineers is enclosed with this Planning Application. The Assessment concludes that the subject site, which is located in Flood Zone C, is an appropriate location for the proposed development.

A Hydrological and Hydrogeological Assessment prepared by AWN Consulting is enclosed with this Planning Application. The reports concludes that:

'There is no direct source pathway linkage between the proposed development site and open water (i.e. Dodder Catchment or Dublin Bay). It is concluded that there is also no resultant indirect source pathway linkage from the proposed development through public sewers which could result in any change to the current water regime (water quality or quantity) and open water as defined.'

It is anticipated that the proposed development would not be likely to have a significant effect on the hydrological pathway to a Natura 2000 site or water body status and habitat requirements within the Natura 2000 network.

5.3.3 Air Quality Pollution and Climate

The environmental agency classifies the air quality of the application site as 'Good' as illustrated below at Fig 5.1. The possible effects on air quality as result of the development include a short-term increase in dust and emissions arising during the demolition and construction phases.

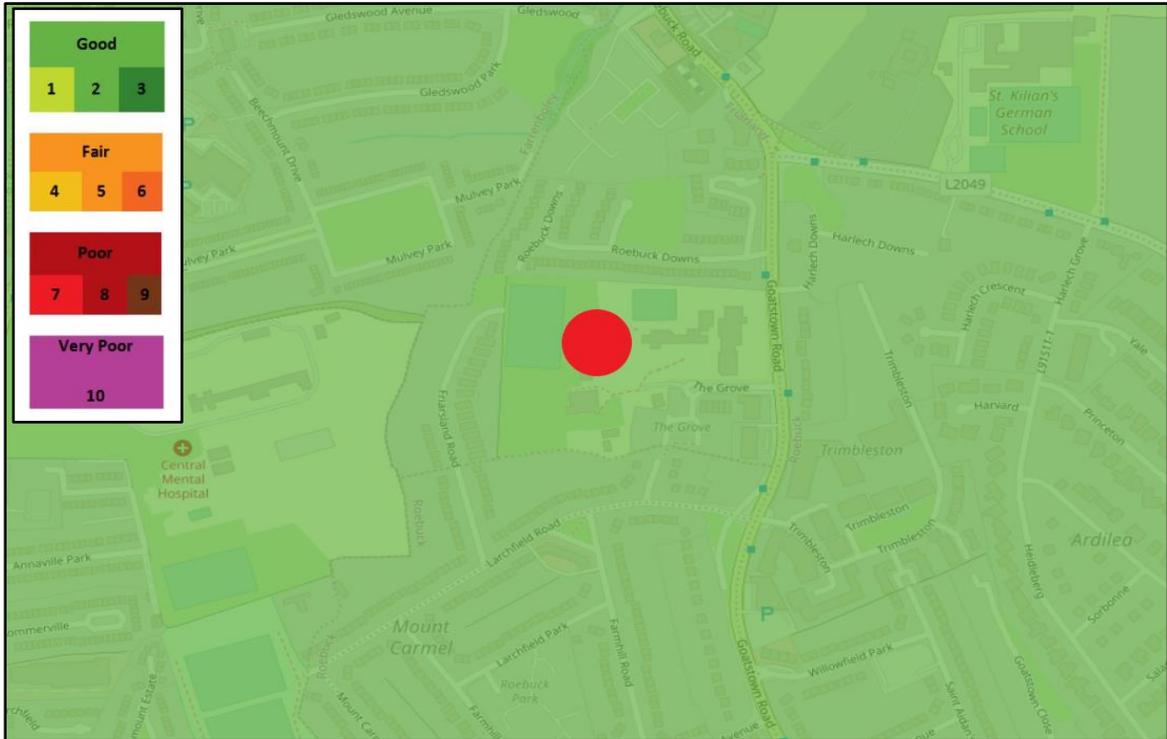


Figure 5.1 Air Quality Index surrounding the application site (red dot – indicative)

Source: <http://www.epa.ie/air/quality/> (Annotated by Thornton O'Connor Town Planning)

A Dust Management Programme encompassing monitoring, management and suppression/abatement techniques will be incorporated into the construction works. Further detail is outlined in the Construction Management Plan prepared by DBFL Consulting Engineers.

It is noted that the proposed development proposes a relatively low provision of car parking with a total of 9 No. spaces, thus encouraging the use of sustainable modes of transports such as cycling and buses. It is anticipated that the proposal would not be likely to impact on the environment in regard to air quality pollution and climate.

5.3.4 Landscape

The application site is not located within an Area of High Landscape Value nor is there any specific amenity, landscape or visual objectives pertaining to the site.

A Landscape Masterplan and Visual Impact Assessment complete with photomontages has been prepared by The Big Space Landscape Architecture and is submitted as part of this Planning Application.

The Landscape Visual Impact Assessment prepared by The Big Space Landscape Architecture concluded that:

'Given the planning policy for the area and the subject site's proximity to UCD and Dublin city centre, it is highly probable that development of this site will take place at some stage in the near future, and it is likely that any proposed viable development will give rise to impacts of a similar nature.'

'It is considered that the benefits of the proposed development will substantially outweigh the negative aspects of the proposal.'

The subject scheme has been carefully designed to ensure, in accordance with the clear direction in recent national legislation, to increase height and density in appropriate locations and the proposed development can be successfully assimilated into its context.

5.4 Material Assets (Architectural and Archaeological Heritage, and the Cultural Heritage)

The justification for the demolition of a portion of the Goatstown Afterschool building located on the site and the removal of a prefabricated structure has been established in the Planning Report prepared by Thornton O'Connor Town Planning.

The history of the subject site has been assessed and it has been established that there are no buildings of significance on the subject site.

5.5 The Existence of the Proposed Development

The proposed development is located on *Objective 'A'* lands as zoned in the *Dún Laoghaire Rathdown County Development Plan 2016 – 2022*, where the objective is *'to protect and-or improve residential amenity'*. It is anticipated that there will not be any resultant negative impacts from the operation of the proposed development.

There is an 'INST' designation pertaining to the subject site. The Development Plan outlines this objective as follows:

'To protect and/or provide for Institutional Use in open lands.'

We note the following policy objective relating to open and Institutional Lands within the *Dún Laoghaire Rathdown Development Plan 2016-2022*. Under Section 8.2.3.4 xi) the following is stated as applying to Institutional Lands.

'Where no demand for an alternative institutional use is evident or foreseen, the Council may permit alternative uses subject to the area's zoning objectives and the open character of the lands being retained'

As demonstrated in the accompanying Planning Report prepared by Thornton O'Connor Town Planning it is evident from the sale of the subject site by the Religious Congregation associated with Our Lady's Grove School that the lands were no longer required for 'institutional' use. For the purposes of clarity, Our Lady's Grove Primary School and Our Lady's Grove Secondary School, which are adjacent to the subject lands, have furnished letters (enclosed with this

Planning Application) confirming that the subject lands are not required for expansion of educational facilities and any expansion required will take place on lands within their own demise.

The detailed rationale and justification for the development of the proposed scheme on this underutilised site is further outlined in the accompanying Planning Report prepared by Thornton O'Connor Town Planning and the Design and Accessibility Statement prepared by Stephen Marshall Urbanism Limited.

5.6 The Use of Natural Resources

As outlined at Section 4.4.1 (c), the development will involve the consumption of natural resources throughout the development process, however it is not anticipated to be to an extent that would have a significant impact on the environment.

5.7 The Emission of Pollutants, the Creation of Nuisances and the Elimination of Waste

5.7.1 Traffic and Access

Having regard to the nature of the use proposed, the typical residents who are in-situ short-medium term and the location of the site within walking/cycle distance to University College Dublin, it is proposed to provide a significantly reduced level of car parking provision, with 9 No. car parking spaces included within the subject scheme.

The temporary traffic congestion anticipated during the demolition and construction phase would be mitigated and controlled and in accordance with best practice. Mitigation measures will be put in place for potential dust and dirt pollution arising from construction vehicles exiting the site.

5.7.2 Noise

The temporary noise emitted during the construction and demolition phases of the development will have the potential to impact on the surrounding areas.

The demolition and construction works will be carried out in accordance with the recommendations of BS 5228 'Code of Practice for noise and vibration control on construction and open sites - Part 1: Noise' and comply with BS 6187 Code of Practice for Demolition. Mitigation measures will be undertaken through the development in accordance with best practice guidelines.

A Noise Impact Assessment has been prepared by AWN Consulting and is enclosed with this application.

'Criteria have been defined for mechanical plant noise for both external receptors and also potential future receptors within the development itself. Plant items will be selected and located during the design stage so that the defined criteria will be achieved and so there is no negative impact on sensitive receivers within the development itself or on nearby sensitive receptors.'

Outward noise impacts due to increased traffic on public roads has been assessed as having a negligible or imperceptible impact and no further mitigation will be required.

For inward noise impacts to the proposed developments the baseline noise study indicates that reasonable sound levels will be achieved within the proposed buildings when windows are open. Hence, no further mitigation will be required for external to internal noise intrusion.'

It is anticipated that the operation of the development would not result in any long-term noise impacts to neighbouring properties.

5.7.3 Waste

An Operational Waste Management Plan prepared by AWN Consulting Limited respectively, copies of which are enclosed with this application.

'In summary, this OWMP presents a waste strategy that complies with all legal requirements, waste policies and best practice guidelines and demonstrates that the required storage areas have been incorporated into the design of the development. Implementation of this OWMP will ensure a high level of recycling, reuse and recovery at the development. All recyclable materials will be segregated at source to reduce waste contractor costs and ensure maximum diversion of materials from landfill, thus achieving the targets set out in the EMR Waste Management Plan 2015 – 2021.

Adherence to this plan will also ensure that waste management at the development is carried out in accordance with the requirements outlined in the DLRCC Guidance Notes for Waste Management in Residential & Commercial Developments and the DLRCC Waste Bye-Laws.

The waste strategy presented in this document will provide sufficient storage capacity for the estimated quantity of segregated waste. The designated area for waste storage will provide sufficient room for the required receptacles in accordance with the details of this strategy.'

The Plan outlines that the Waste Management Strategy for the proposed development is in line with best practice guidelines.

5.8 Analysis of Identified Impacts

Thornton O'Connor Town Planning have identified the potential impacts anticipated to arise from the proposed development. The identified impacts are deemed to be negligible and are not anticipated to have long term negative impacts on the surrounding environment of the subject site. A search of the online planning application database of both Dún Laoghaire Rathdown County Council and An Bord Pleanála found that there are no current or determined applications of significant scale in the immediate area surrounding the subject site. However, for robustness, this application includes an assessment of the cumulative impacts of adjacent developments including the permitted and completed development for the realignment of the hockey pitch to the north of the subject site (D18A/0387 / ABP Ref. PLo6D.302898) and the permitted applications for changing rooms for the adjacent Secondary School (D20A/0192 and D20A/0198).

The assessment of cumulative impacts also includes the as-lodged application for a student accommodation development at the former Victor Motors site, Goatstown Road, Dublin 14 (Ref. PLo6D.308353). The cumulative impacts of the proposed development and any nearby existing or proposed development are set out in the reports enclosed with this application and are not considered to be significant.

The proposed development is considered to have a positive impact in terms of meeting the needs of the student population seeking residential accommodation. The subject scheme will also contribute positively to the local community through the availability of 7,956 sq m of public open space in the form of a linear nature trail and parkland area and a recreational space with a half basketball court and table tennis tables, which will help to retain the open parkland character of the subject site. The scheme will also reduce housing pressures in the area as student relocate to the proposed purpose built facilities.

6.0 SUMMARY AND CONCLUSIONS

This report has been prepared in accordance with Schedule 5 and Schedule 7 of the *Planning and Development Regulations 2001* (as amended) and has had due regard of the criterion set out within the European Directive 2014/52/EU. The report has assessed the proposed development in terms of the possible effects on the environment including human, biodiversity, flood, air, water, cultural heritage, traffic and access, noise, material assets and landscape. Through an EIA screening methodology of EIA thresholds, it has been established that an EIAR is not required to accompany this Planning Application.

The proposed development has been assessed against the criterion for sub threshold projects. It has been established that it is anticipated that the proposal would not be likely to have a significant effect on the environment as result of the characteristics of the proposed development, location of proposed development or the characteristics of potential impacts.

It has been established that an Environmental Impact Assessment Report (EIAR) is not required to accompany the subject application.

