

**Environmental Impact Assessment Screening Report
Proposed Strategic Housing Development at the
Former Europa Garage
Newtown Avenue
Blackrock
Co. Dublin**

Seabren Developments Ltd

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Introduction

This screening report in respect of Environmental Impact Assessment is submitted in relation to the proposal by Seabren Developments Limited for permission for a strategic housing development at the vacant site of the former Europa Garage site, Newtown Avenue, Blackrock, Co. Dublin. The site has an area of 0.49ha and the proposed SHD scheme is for 101 apartments in two blocks over basement car-park. The full description of the development is:

The proposed development provides for:

The construction of a residential development providing 101 residential units (GFA c.11,889 sq.m including basement) of 1-6 storeys together with residential accommodation in attic floor over (two units) in two Pavilion style buildings. The apartment units will consist of:

- 51 no. 1-bed units (c.49-61 sq.m),
- 42 no. 2-bed units (c.66-94 sq.m) and
- 8 no. 3-bed units (c.96-108 sq.m)

all with associated private balconies/terraces to the north/south/east/west elevations.

- Block A (1-4 storeys) shall provide for 47 no. apartment units (total GFA c. 3,627 sq.m);
- Block B (3-6 storeys plus attic floor) shall comprise of 54 no. apartments (total GFA c.5,041 sq.m).
- Basement level (c.3,204 sqm) shall provide for 73 no. car parking spaces (including visitor, GO-Car and mobility impaired); 194 no. bicycle spaces; plant areas; switch room; bin storage area; and surface water attenuation tank.

The development proposal shall also provide for c.1,162 sq.m of communal open space and 302 sq.m of public open space; basement ramp adjacent to north-western boundary; new pedestrian accesses off Newtown Avenue to north; 50 no. bicycle parking spaces at grade; bin holding area; ESB substation; structural works to existing western boundary wall; amendments to a portion of existing southern boundary wall reinstating it to a height of +21.380m O.D. between the front building line of number 7 Craigmores Gardens and the rear boundary of the property; all other ancillary site development works, and site services required to facilitate the proposed development.

European Union Directive 2011/92/EU, as amended by Directive 2014/52/EU, on assessment of the effects of certain public and private Projects on the environment is commonly known as the EIA Directive. The EIA Directive sets out classes of projects, which are likely to have significant effects on the environment and for which, therefore, Environmental Impact Assessment (EIA) is obligatory (Annex I) or for which EIA may be required (Annex II). Determination of whether a project in Annex II is likely to have significant effects on the environment, and therefore requires EIA, may be by way of application of thresholds, or on a case by case basis, or a combination of both methods. Criteria to determine, on a case by case basis, whether a project of a type listed at Annex II is likely to have significant effects on the environment and should be subject to EIA, are set out at Annex III to the Directive and the information to be provided in this regard to the relevant development consent authority, by the developer, is set out at Annex IIA.

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

Criteria to determine on a case by case basis whether sub-threshold development listed in Part 2, Schedule 5, of the Planning and Development Regulations, 2001, as amended, should be subject to EIA are set out in Schedule 7 of the Regulations (corresponding to Annex III of the Directive). Schedule 7A of the Regulations sets out the categories of information required in order for the relevant planning authority, in this case the Board, to make such determination (corresponding to Annex IIA of the Directive).

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

- European Commission: *Environmental Impact Assessment of Projects Guidance on Screening, 2017*

- Draft Guidelines on the Information to be contained in *Guidelines on the Information to be contained in Environmental Impact Assessment Reports, 2017*, by the Environmental Protection Agency of Ireland
- *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018)* by the Department of Housing, Planning and Local Government.

The screening report has been compiled by Doyle Kent Planning Partnership Ltd, the directors of which (Karl Kent and Jane Doyle) have many years' experience of the EIA process. In particular, Karl Kent has qualifications in Planning, Urban and Building Conservation and EIA management and Jane Doyle has qualifications in Urban and Regional Planning and EIA management. Relevant contributions from other members of the design team in respect of the various environmental topics have been included in compiling the report. The proposed development has been designed by Metropolitan Workshop Architecture and Urbanism. Other members of the design team include CORA Consulting Engineers (civil and structural), Áit Urbanism and Landscape, Dynamic Design (sustainability and environment), NRB Consulting Engineers (transportation) , IES (daylight, sunlight and overshadowing)and Openfield (ecology).

Screening for Environmental Impact Assessment

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

10. Infrastructure projects –

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

(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).’

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

The proposed SHD scheme of 101 units at the site of the former Europa Garage in Blackrock is a project of a type specified at 10(b)(i) of Schedule 5, Part 2, of the Regulations, but is sub-threshold, constituting only 20% of the relevant threshold of 500 dwelling units. Similarly in relation to 10(b)(iv), the site is within a built-up area, but at 0.49ha is significantly below the threshold of 10 hectares.

However, assessment under the heading of project type 15 above is required to determine whether EIA is necessary. Accordingly, it is appropriate to submit the information required in Schedule 7A of

the Regulations to facilitate determination by the Board having regard to the criteria set out in Schedule 7.

Schedule 7A Information

Schedule 7A of the Planning and Development Regulations, 2001, as amended, sets out the information to be provided by the applicant to enable the planning authority (the Board in this case) to screen sub-threshold development for EIA. This report follows the scheme of headings of Schedule 7A, whilst applying the more detailed criteria of Schedule 7 to the relevant information. Schedule 7A requires the following information:

1. *A description of the proposed development, including in particular—*
 - (a) *a description of the physical characteristics of the whole proposed development and, where relevant, of demolition works, and*
 - (b) *a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.*

2. *A description of the aspects of the environment likely to be significantly affected by the proposed development.*

3. *A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from —*
 - (a) *the expected residues and emissions and the production of waste, where relevant, and*
 - (b) *the use of natural resources, in particular soil, land, water and biodiversity.*

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

1. A description of the proposed development, including in particular—

(a) a description of the physical characteristics of the whole proposed development and, where relevant, of demolition works

Size and Design of the proposed development

It is proposed to construct a scheme of 101 apartments on this site of 0.49ha, as described above. The total floor area of the development will be 11,872 sqm, including the basement of 3,204 sqm, or 8,668 sqm excluding the basement. The development will have site coverage of 47% and plot ratio of 1.91, excluding the basement and a density of 205 units per hectare.

The scheme will contain two main blocks, one toward the western part of the site (Block A – 3,627 sqm excl. basement) and the other in the eastern part (Block B – 5,041 sqm excl. basement) facing onto the public road. Access to the basement car park is proposed via a ramp to the rear of Newtown Villas. Amenity space is proposed in the area between the two blocks and also along the western boundary to Newtown Villas, over the basement access ramp. There will be parking underground for 73 cars, or approximately 0.7 spaces per apartment. Formation of this will require secant piling to the perimeter of the basement, followed by excavation of the relevant area.

The rear-most Block A contains between two and four floors, laid out to eliminate any overlooking of the adjoining residential properties to the west (Newtown Villas) and south-west (Craigmore Gardens). The existing boundary wall to Newtown Villas, originally the side wall of the tram depot, is approximately two storeys in height and will be retained in situ. Block A contains 47 units, 34 one-bedroom and 13 two-bedroom.

Block B contains 54 units, 17 one bedroom, 29 two bedroom and 8 three bedroom. It is subdivided into three main parts, each treated architecturally as a pavilion, to acknowledge the differing edge conditions of the site. The facades are designed to form a new streetscape onto each part of Newtown Avenue, facing both northwards and eastwards.

In the prominent north-eastern part of the property, the proposed Block B addresses an existing sharp bend on Newtown Avenue in a carefully articulated but robust manner, rising to six floors plus attic level accommodation within the pitched roof. The building is stepped back to allow a generous public realm, including replacement tree planting (in lieu of a large, but poor quality sycamore tree currently standing at this location).

At the southern edge of the site, approaching existing two storey residential property in Newtown Avenue, Block B is tapered down from five floors to three floors, using a mono-pitch roof design, to acknowledge the scale of the nearest house, No.61 Newtown Avenue. Linking the two main parts of Block B is a four storey section facing eastwards onto Newtown Avenue. There is extensive use of brick with some metal cladding of upper level elements and roofs.

Nature of any associated demolition works

The site was used as a tram depot for about seventy years up to the mid-twentieth century and subsequently as a commercial garage. It has been previously cleared of all above ground structures with the exception of the walls on the western and southern boundaries, which are to be retained. Existing concrete floor slabs and any foundations remaining on the site will be broken up and removed.

Land and Soil

The site has an area of 0.49ha and is currently sealed, disused land, which is providing no benefit to the owners or the wider community.

Site investigations carried out on the property, to depths below the proposed excavation level, have shown a top layer of made up ground, typically around one metre deep, but extending beyond two metres in certain parts of the site. This varies in its make up across the site, with cohesive clay material and granular sand and gravel soils and some building material, including areas of concrete at 1.5m depth. The underlying natural soils are predominantly glacial till material, mostly gravelly silty clay, although gravel was recorded in one area at 3.80m below ground level. Most of this material will be removed from the site to a depth of typically 4m.

Site investigations have shown evidence of contamination on the site, principally pockets of hydrocarbons such as diesel. The historic records of the site also indicate a disused underground petrol storage tank.

Natural resource: Water

Some ground water was found during site investigations on the site, at depths of 3.8m, which is at or slightly above formation level for the basement. Some water was encountered at higher levels, but was determined to be a perched water table. Discharge of surface water will be attenuated (SUDs) and foul water will discharge to the public sewerage system.

Natural resource: Biodiversity

The proposed development has little significance in relation to biodiversity, as the site is entirely composed of hard surfaces with no semi-natural habitats. The proposed landscaping and planting will contribute toward enhanced biodiversity.

The Production of Waste

Waste arisings during construction will predominantly consist of excavated material, as described above and amounting to some 16,364 cu.m. of soil, which will be removed to a licensed waste facility. Any areas of contaminated soil will be isolated, excavated and exported off-site by an appropriately permitted waste contractor and will be sent for appropriate treatment at a licensed waste facility.

The existing concrete slab will have to be broken out and removed from site. The existing concrete area is 4703m². Allowing for a 200mm thick slab, it is anticipated that the slab will generate approximately 940m³ of concrete to be demolished and removed. The basement finished floor level is 12.525m AOD. The approximate site ground level is 16.2m AOD. Allowing for a 300mm thick basement slab, it is estimated that a 4.0m dig will be required.

The proposed basement area is 4091m. It is anticipated that approximately 16,364m of soil will have to be removed during excavation works to allow for construction of the basement level. The waste material generated by construction works will be mixed Construction & Demolition (C&D) waste, comprising of concrete, bricks and blocks. Material will be sorted and separated on site into different classifications for removal off site which is considered standard procedure.

Waste arisings during the operational phase of the development will be typical domestic waste, to be managed in accordance with an operational waste management plan.

Pollution and Nuisances

The main potential for pollution or nuisance would arise during the construction phase of the development. The main potential for nuisance during construction relates to noise, dust and vibration during construction. Appropriate mitigation measures will be in place, as described in the *Preliminary Construction and Environmental Management Plan*. The potential for run-off of suspended solids or for fuel or other spillages on site will be reduced by appropriate site management and mitigation measures. It should be noted there are no water courses on the site. Any pockets of contaminated soil or any existing underground oil storage tank will be exported off-site by an appropriately permitted waste contractor and will be sent for appropriate treatment at a licensed waste facility. A detailed construction management plan will be submitted to the planning authority for agreement prior to commencement of development.

Risk of Major Accidents and/or Disasters including those caused by Climate Change

The proposed development is of a type not especially vulnerable to risk of major accidents and the site is not located near any Seveso site. The risk from climate change is no greater than applicable to any other residential development in the area and the site is not vulnerable to flooding, as shown in the *Site Specific Flood Risk Assessment Report* by CORA Consulting Engineers.

Risks to Human Health

The proposed development does not pose any significant risk to human health, given its nature, scale and location. The main risk of any such impact is during the construction phase of the development, but this will be minimised by controls and the normal Health and Safety requirements applying to building sites and the measures outlined in the *Preliminary Construction and Environmental Management Plan*. These controls will be further described in the detailed construction management plan to be submitted to the planning authority for agreement prior to commencement of development.

Cumulation with other development

Nearby permitted developments of significance include:

- Ref. ABP 303804-19: A recent SHD scheme of 294 dwellings, with parking for 272 cars, has been developed on the southern side of the Blackrock Bypass, at St. Teresa's (Protected Structure), Temple Hill, on lands approximately 200m south of the Europa Garage site.
- Ref. D16A/0843 and Ref. D17A/0599 – Permission for increased floor space to 26,848 sq. m., together with Ref. D17A/0950 (ABP 300745-18), which is permission granted by the Board in 2019 for 45 number apartment units over the permitted shopping centre and lower ground floor car park, at Frascati Shopping Centre, on Blackrock Bypass one kilometre from Europa Motors.
- Ref. D17A/0644 – permission for various alterations and extensions to Blackrock Shopping Centre granted by the planning authority in 2017.
- Ref. D16A/0418 (ABP PL06D.247702) permission granted by the Board in 2017 for a new five storey office block of 13,973 sqm at Blackrock Shopping Centre, Blackrock, Co. Dublin.

(b) a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.

The existing and approved land use

The Europa Garage site of 0.49ha is a cleared, brownfield site – essentially sealed land. Planning permission was granted for a residential development per D17A/0137 (ABP 248456) in respect of the site, for a 7,925 sqm residential development of 51 units. As approved by that permission, all structures were cleared from the property, save for the substantial walls to the south and west boundaries, the latter being the side wall of the tram depot building. This is not an environmentally sensitive site and its soil and land are not of particular natural heritage value.

The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground

The site is located at the eastern end of Newtown Avenue, Blackrock, near the junction of that road and Seapoint Avenue. This is a mature urban settlement, forming part of the wider Dublin conurbation, with lands laid out as roads, pavements and private gardens. There are some public parks, such as the small area at Temple Park, diagonally opposite the site, Rockfield Park on the south-west side of the Blackrock bypass and Blackrock Park, as well as open stretches of institutional lands, such as UCD Smurfit Business School. The nearby development at St. Teresa's (Protected Structure), Temple Hill, includes public open space of 1.5ha approximately.

The largest and most significant water resource in the Blackrock area is the wide expanse of Dublin Bay and its coastline, which is close to the Europa Garage site, but separated from it by buildings, roads and the Dart line. Blackrock has limited fresh water resources including the Maretimo Stream, located approximately 200m west of the Europa Garage site. Public water supplies for the area come from the Irish Water system, principally from the Vartry Reservoir in County Wicklow.

There are no significant ground water resources under the Europa Garage site, as shown by site investigations, and the general area is classed by Geological Survey Ireland as a *Poor Aquifer PI (Bedrock which is generally unproductive except for local zones)*.

The Europa Garage site is not within or directly adjacent to any area designated for nature conservation at a national or international level. The site is entirely composed of hard surfaces with no semi-natural habitats. There are no water courses, bodies or open water or habitats which could be described as wetlands. There is no suitable habitat for species which are protected or considered to be of conservation interest. Hydrological pathways ultimately lead to Dublin Bay via the Ringsend wastewater treatment plant.

The absorption capacity of the natural environment

Wetlands, riparian areas, river mouths, mountain and forest areas, nature reserves, parks

As an urban area, Blackrock is not a location of significant wetlands, riparian areas, river mouths, mountain and forest areas or nature reserves. As noted above, there are some public parks in the vicinity, notably Blackrock Park and the coastal parkland at nearby Monkstown. The Europa Garage site is on the inland side of Newtown Avenue and is bounded on two sides by public roads and by suburban housing on the other two side.

Coastal zones and the marine environment and areas classified or protected under legislation including Natura 2000 areas and areas, including where there has been a failure to meet environmental standards

The principal natural resource in the area is the nearby coastline, together with the marine waters of Dublin Bay. The DLR County Council rigorously protects the coastline and, subject to this protection, it has a high absorption capacity to accommodate recreational activities by the inhabitants.

Only surface water is discharged directly into the marine waters in the area and all foul water is pumped across the bay to the Ringsend Waste Water Treatment Plant (WWTP).

There has been past failure to meet the environmental quality standards in respect of discharge to marine waters from the Ringsend WWTP, as laid down in legislation of the European Union. However, this is in course of being remedied and the treatment capacity of the WWTP is being expanded to a population equivalent of two million. The first phase of the work is due for completion this year, 2020, for an extension of 400,000 p.e.

There are three natural heritage designations applying to the bay and coastline in the vicinity of Newtown, including two European Sites [*South Dublin Bay Special Area of Conservation* (000210) and the *South Dublin Bay and River Tolka Estuary Special Protection Area* (004024)], and one proposed NHA, the *South Dublin Bay pNatural Heritage Area* (000210). In relation to the Europa Garage site, there is little potential for direct impacts, notwithstanding its proximity to these sites. There are no water courses running through the site and all foul effluent from the future development will be conveyed to the Ringsend WWTP.

Densely populated areas

Blackrock is not particularly densely populated compared to other parts of the wider Dublin area. At the last census of 2016, the Blackrock-Templehill ED, where the Europa Garage site is located, had a population density of 3,376 / km². The nearby Blackrock-Seapoint ED and Blackrock-Central ED had population densities of 3,976 / km² and 3,658 / km², respectively. By comparison, Rathmines East had a density of 6,935 / km² and Dun Laoghaire West Central had 5,487 / km². Accordingly, the area has absorptive capacity to accommodate more people.

Landscapes and sites of historical, cultural or archaeological significance

The Newtown area of Blackrock has been inhabited since at least the Middle Ages, when a castle or fortified dwelling existed, possibly on the site of *Seapoint Manor*, to the east of the Europa Garage site. More intense development took place in the environs of the Europa Garage site from the late Georgian-era and the general area has been largely built up since the second half of the nineteenth century. On the northern and eastern side of Newtown Avenue, opposite the Europa Garage site, is a heterogeneous array of houses and apartments of various ages, including from the 18th, 19th and 20th centuries. Three of the houses are Protected Structures

(*Blackrock House, Newtown House and Seapoint Manor*) as is also the entrance gateway to Blackrock House. Newtown Villas adjoins the western boundary of the Europa Garage sites and constitute an Architectural Conservation Area.

The historic road pattern persists in the vicinity, although the construction of the dual carriageway Blackrock bypass in the 1980s effectively isolated the more urban Blackrock Village and Newtown (including Europa Garage) from the less dense hinterland. Following the demolition of *Maretimo House* around 1970, the removal of the old tram depot structures on the Europa Garage site has been the main change in the immediate area. This has left a notable gap in the built fabric of the area with consequent capacity to absorb additional development without adverse impact on the streetscape and on buildings of architectural heritage value. In respect of archaeological heritage, it is possible, but unlikely, that some remains associated with the mediaeval castle subsist on the Europa Garage site.

2. *A description of the aspects of the environment likely to be significantly affected by the proposed development.*

Consideration is given below to the likely effects on the environment, as set out in Section 171A(b)(i) of the Planning and Development Act, arising from the proposed development.

Population and human health

Neither the construction nor the operation of the proposed residential development will cause any significant impacts likely to result in adverse effects on human health, having regard to the nature, scale and location of the development, including mitigation measures to control emissions during the construction and operational phases.

The construction impacts will be significant, temporary and negative in relation to the site and immediate environs. The site development works, including breaking up the existing concrete floor slab, excavation of the basement and any necessary piling, will cause impacts in terms of emissions of noise, dust and vibration. These impacts will be confined to the site primarily and will be controlled and mitigated by the construction management measures as outlined in the *Preliminary*

Construction and Environmental Management Plan, to be further developed after appointment of the main contractor for the works. A dilapidation survey will be conducted to all boundary structures prior to the commencement of works.

Construction traffic to and from the site over a period of approximately one year will be subject to a construction traffic management plan to be agreed with the planning authority.

The operational phase of the development will cause no negative impacts and the additional population will strengthen the viability of the local economy and will generate limited additional traffic due to the location near good quality public transport.

The risk of accidents or disasters is very limited, as the Europa Garage property is not in the vicinity of any site with a particular risk of accident or disaster (e.g. Seveso type establishment). A site specific flood risk assessment has shown there is no particular risk of flooding. Arrangements for access have been subject of a road safety audit.

The operational phase of the development will generate domestic waste, which will be managed so as to reduce waste generation, optimise recycling and segregate into appropriate bins (black, brown, green) in the waste storage areas at ground floor and basement levels for weekly collection by a licensed waste contractor. Accordingly, there will be no significant impacts on the environment, including human health, arising from waste management during the operational phase.

Biodiversity

The Europa Garage site is entirely composed of hard surfaces with no semi-natural habitats. It is proposed to carry out a scheme of planting on the site, which will have a positive, moderate and permanent impact on biodiversity. A screening report for Appropriate Assessment has been prepared by *Openfield Ecological Services*, which concluded that significant effects to Natura 2000 sites are not likely to arise from the proposed development, either alone or in combination with other plans and projects. The report also notes that there is no evidence to suggest that the proposed increase in building heights will have the potential to adversely impact species associated with Natura 2000 sites.

Land and Soil

The site of 0.49ha is sealed ground for the most part composed of made up ground overlying glacial till. Most of this material will be removed from the site to a depth of typically 4m, although some of the material may be reused as fill, depending on further assessment. The impacts on land and soil are neutral in quality, of moderate significance and permanent in duration. There will be a minor positive impact, due to the removal of pockets of hydrocarbon contamination. Excavation during construction will result in removal of some 16,364 cu.m. of soil to a licensed waste facility. The soil is of a type of no particular value or scarcity.

Water

The nearest water course to the site is the Maretimo Stream, some 200m to the west. There are no water courses crossing the site nor evidence for such on the First Edition Ordnance Survey published 1845. Limited ground water was encountered on the Europa Garage site generally at or near the formation level for the basement car park, with the exception of a small perched ground water deposit at a higher level. Any potential temporary negative impacts on ground water will be mitigated by standard construction management measures, as outlined in the *Preliminary Construction and Environmental Management Plan* and will be subject to agreement in detail with the planning authority.

During the operational phase of the development, surface water will be attenuated prior to discharge. The effluent from the development will discharge ultimately to the Ringsend WWTP, which is being upgraded as set out above. Therefore, the generation of emissions from the completed development, combined with existing and permitted, will not be significant. Impacts will be neutral, not significant and permanent.

Air and Climate

During the construction phase, which will last about one year, the works will entail breaking up the existing concrete floor slab, excavation of the basement and possible piling, thereby generating noise, dust and vibration impacts. These impacts will be confined to the site primarily and will be

controlled and mitigated by standard construction management measures as outlined in the *Preliminary Construction and Environmental Management Plan*. Construction traffic to and from the site over a period of approximately one year will be subject to a construction traffic management plan to be agreed with the planning authority. The construction impacts will be significant, temporary and negative in relation to the site and immediate environs.

The operational phase of the development will cause no significant negative impacts in respect of emissions. No significant impacts on climate will arise, as the development will comply with current standards for energy efficiency. The buildings are designed to meet the Building Regulations standards in respect of noise transmission and the new NZEB standard of energy efficiency, thereby minimising greenhouse gas emissions.

Material assets, cultural heritage and the landscape

The Blackrock area has a well developed road network and the *Transportation Assessment* by NRB confirms that the construction and full occupation of the scheme will have a negligible impact upon the operation of the adjacent road network. The proximity to good quality public transport and the availability of a dedicated cycle lane on Newtown Avenue will enable a favourable modal split in respect of public transport/cycle v private car use.

The construction traffic will be controlled as outlined in the *Preliminary Construction and Environmental Management Plan* and subject to a more detailed *Construction Traffic Management Plan*, to be compiled upon appointment of the main contractor and to be agreed with the planning authority.

The construction phase will entail removal of 16,364 cu.m of soil to a licensed facility. The construction will entail use of steel, brick and concrete plus metal cladding among the principal material assets.

Cultural heritage and landscape

There are four Protected Structures within the vicinity of the Europa Garage lands. These consist of three houses, *Blackrock House* (RPS 234), plus its entrance gateway (also RPS 234), *Newtown House* (RPS 254) and *Seapoint Manor* (RPS 289 - also indicated on DLR County Development Plan map as *The Courtyard*). *Newtown Villas*, immediately to the west of the Europa Garage site, is an Architectural Conservation Area. The remains of Byrne's Castle, recorded monument No. 023-008, may lie within or under *Seapoint Manor*, on the eastern side of Newtown Avenue.

The construction phase of the development, due to its temporary nature, does not give rise to any significant impact on the cultural heritage. There is a possibility of an impact on archaeological remains, but there is no evidence for any such on the site. In any case, the site excavation works can be carried out in the presence of an appropriately qualified archaeologist, to ensure appropriate measures are taken, in the event of archaeological deposits being located.

The *Landscape and Visual Impact Assessment Report*, by Áit Urbanism + Landscape, analyses the visual impact of the development. A number of verified views (by James Horan) were assessed from locations in the general environs of the Newtown area of Blackrock, including from four locations in the immediate vicinity of the site.

The *Landscape and Visual Impact Assessment Report* states that the derelict nature of the Europa Garage site has led to the landscape quality of the site becoming visually and physically degraded. The overall visual quality of the immediate surrounding public realm, comprising of in-situ concrete footpaths, is of medium quality. During construction of the development, there will be significant negative impacts on the visual environment.

Impacts of the completed development, as assessed by Áit, will generally be moderate and positive in the medium term in relation to the immediate environs to the east of the site and moderate and neutral in relation to the ACA and the northern side of the site. The report states that the proposed development will provide for a high-quality landscape setting and the creation of an improved interface with the public realm on Newtown Avenue and Maretimo Terrace will enhance the

streetscape. Visual impacts from further afield in the general area are classed as slight and negative or neutral in the medium term.

Interaction of the foregoing factors - including cumulation of effects with other existing or approved developments

The interaction of the foregoing impacts, described above, would not give rise to any significant negative impacts on the environment. The principal cumulative effect with other existing or approved development will be during the construction phase. There are no substantial developments likely within the immediate vicinity and none of the permitted developments cited above are located in close proximity to the Europa Garage site.

Therefore, the most likely cumulative impact during the construction will be increased construction traffic volumes generated by this and other developments. In the context of the Blackrock area traffic volumes, this will not be significant.

The development will have a positive, permanent and moderate impact in terms of helping to consolidate the population within the Dublin urban area, by itself and also in terms of its cumulative impact with other existing and permitted development in the vicinity.

3 A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from —

(a) the expected residues and emissions and the production of waste, where relevant, and

(b) the use of natural resources, in particular soil, land, water and biodiversity.

Population and human health

The Eastern and Midlands Regional Assembly *Regional Spatial and Economic Strategy* (RSES) sets out a policy in relation to Dublin City and Suburbs (which includes Blackrock) of supporting the “consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built-up area”.

The DLR *County Development Plan 2016-2022*, echoes this ambition to further increase residential densities, for example at Section 1.2.5.1. where it states

.....a key strand of the overall Settlement Strategy focuses on the continued promotion of sustainable development through positively encouraging consolidation and densification of the existing urban/ suburban built form – and thereby maximizing efficiencies from already established physical and social infrastructure.....

This policy approach is translated into the residential zoning of the Europa Garage site and as detailed in the *Blackrock Local Area Plan, 2015*, which specifically addresses the residential development of the site. Accordingly, the proposed development would have a significant, positive and permanent impact in terms of population.

Neither the construction nor the operation of the proposed residential development will cause any significant impacts likely to result in adverse effects on human health, having regard to the nature, scale and location of the development, including mitigation measures to control emissions (noise, dust, vibration) during the construction and operational phases. Removal of waste will be as described above, leading to no significant negative impacts.

Biodiversity

As set out above, the Europa Garage site has no natural or semi-natural habitats and the proposed development, by the introduction of areas of soft landscape planting, would have a positive, permanent impact of moderate significance on the biodiversity of the site and environs. Mitigation measures to control emissions (noise, dust, vibration) during the construction and operational phases, including waste water and surface water, will ensure no significant negative impacts on biodiversity.

A screening report for Appropriate Assessment by *Openfield Ecological Services* concluded that significant effects to Natura 2000 sites are not likely to arise from the proposed development, either alone or in combination with other plans and projects.

Land and soil

During the construction phase, there will be a permanent, medium scale, local impact due to the removal of material from the site in order to form the basement. This will be a neutral impact, as the material is not of any particular significance. The impact of the proposed development, upon completion, will be moderate, positive and permanent, insofar as the areas of open space will be reinstated to a high standard.

The construction phase of the development will generate a considerable **volume** of waste material from the basement formation, which will amount to some 16,364 cu.m. of soil. The *Preliminary Construction and Environmental Management Plan* sets out that waste materials generated by construction activities will be managed according to the Department of the Environment, Heritage and Local Government's 2006 Publication - *Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects*. In particular, such materials will be collected by a waste contractor holding an appropriate Waste Collection permit and that they will be sent for recycling and reuse to appropriately Permitted / Licensed Waste Facilities. Therefore, no significant impacts will arise from disposal or recovery of waste.

Water

The main body of ground water was located by site investigation at or about the formation level of the basement. During the construction phase, there will be a permanent, minor impact on groundwater of neutral quality and not of significance.

During the operational phase, there will be discharge of waste water to the public sewerage system, for treatment at the Ringsend WWTP. There will be no emissions of waste water to the environment and no environmental impacts of any significance. Surface water discharge from the site will be attenuated before discharge, which will be a permanent, minor and positive impact. There will be consumption of treated drinking water from the public mains of little significance having regard to the nature and scale of the development.

Air and Climate

The potential for short term impacts on air quality during the construction phase will be countered by mitigation measures as outlined in the *Preliminary Construction and Environmental Management Plan* and there will be no significant environmental impacts. There will be no significant impacts in relation to air and climate during the operational phase, as described above.

Material assets

There will be minor impacts on adjoining and adjacent properties arising from the redevelopment of the Europa Garage site. These will include an overall permanent impact, of between neutral to positive, related to the replacement of a derelict site with the proposed well designed, architecturally composed residential development. There will be long term, insignificant impacts in terms of overshadowing adjoining properties at limited times of the day and year. There will be no significant loss of daylight to nearby properties.

There will be minor long term impacts on traffic patterns in the area during the operational phase and there will be moderate, short term impacts due to construction traffic whilst the development is being carried out.

Cultural heritage

The construction phase of the development, due to its temporary nature, does not give rise to any permanent impact on the cultural heritage. There is a possibility of an impact on archaeological remains.

The proposed development, upon completion, would have a generally neutral to positive, moderate and permanent impact on the setting of the nearby protected structures and ACA, replacing the existing derelict site and unsightly palisade fence.

Landscape

The proposed development, upon completion, would have a generally neutral to positive, and permanent impact on the streetscape, replacing the existing derelict site and unsightly palisade fence with a new, well designed streetscape and public realm.

Interaction and Cumulative Impacts

The Europa Garage brownfield site at Newtown Avenue has been designated for residential development in the DLR County Development Plan, 2016-2022, and in the Blackrock Local Area Plan, both of which have been subject of a strategic environmental assessment. The site is in a built up area of predominantly residential property, close to the centre of Blackrock Village. The area is well serviced, with shops, offices and schools, and is very accessible by both public transport (rail and bus) and by walking, cycling and private motor car. The proposed development, taken together with existing development and the permitted developments cited above, would have a positive impact in relation to national policy to consolidate development into urban areas.

We note that EU Guidance states: *Where proposed by the Developer, a decision that an EIA is not required must state any features of the Project and/or measures envisaged to avoid or to prevent what might otherwise have been significant adverse impacts on the environment.*

The specialist reports submitted with this application to the Board set out a number of mitigation measures, as also outlined above, which reduce or avoid any significant impacts on the environment.

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

The information is set out above following the overall scheme of Schedule 7A of the Planning and Development Regulations, 2001, as amended. The criteria set out at Schedule 7 of the same Regulations have been taken into account throughout this compilation of information.

Conclusion

Having regard to its nature, scale and location, the proposed residential development at the former Europa Garage site, Blackrock, will not have significant environmental impacts.