



**SIMON CLEAR & ASSOCIATES
PLANNING AND DEVELOPMENT
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Screening Statement for Environmental Impact Assessment

**Proposed Mixed-Use Development
Including
Strategic Housing Development**

**Park Shopping Centre & 42-45 Prussia Street
Dublin 7**

Applicant: The Park Shopping Centre Limited

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Introduction

This report has been prepared on behalf of The Park Shopping Centre Limited to assess the potential significant impacts on the environment of a proposed mixed-use development at Park Shopping Centre & 42-45 Prussia Street, Dublin 7. The possible effect on the environment has been examined through the process of an Environmental Impact Assessment (EIA) Screening. The report provides relevant information to inform An Bord Pleanála's EIA screening and is also intended to address Question 11(c) of the SHD Application Form:-

Is an Environmental Impact Assessment Report (EIAR) required for the proposed development?

The report also addresses Item 13 of the Notice of Pre-Application Consultation Opinion, which requires:-

Information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 (if an Environmental Impact Assessment report is not being submitted), should be submitted as a standalone document.

The report has been prepared having regard to the *European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018*, which transpose the 2014 EIA Directive into Irish law. The report has also considered the *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (August 2018)*.

The report was prepared by Darran Quaile BA Mod. Environmental Science, MSc Biodiversity and Land Use Planning. The report references several reports that are to be submitted with the planning application and which provide additional information on certain environmental factors including:-

- Engineering Planning Report – Pinnacle Consulting Engineers
- Landscape Design Report – Mitchell & Associates
- Landscape & Visual Appraisal – Mitchell & Associates
- Cultural Heritage Report – Archaeology Plan

- Outline Construction & Demolition Waste Management Plan – Pinnacle Consulting Engineers
- Operational Waste Management Plan – AWN Consulting
- Appropriate Assessment Screening Statement – Simon Clear & Associates

2. Site Description

The subject site, which has an area of c. 1.2 ha. is a brownfield site located between Prussia Street and the TU Dublin Grangegorman Campus in the inner-city area of Dublin. The site currently accommodates a 1-2 storey shopping centre dating from the 1980s. Much of the site accommodates surface car parking.



Figure 1: Aerial Context Map



Figure 2: View of site from Prussia Street



Figure 3: Area of amenity grassland to east of site

The principal habitat on the site can be classified as ‘Buildings and artificial surfaces’ (BL3) in accordance with Fossitt’s *Guide to Habitats*. There are a small number of ornamental trees scattered throughout the car park. To the east is an area of ‘Amenity Grassland’ (GA2) and tarmacadam footpath connecting the site with the Grangegorman Campus.

There are no watercourses within the subject lands. The nearest water features recorded on 'EPA maps' are the river Liffey located c.1km to the south and the Royal Canal located c. 1.2km to the north.

3. Description of Proposed Development

The proposed development shall comprise the following: -

(1) Demolition of the existing Park Shopping Centre and nos. 42-45 Prussia Street, Dublin 7 and creation of portal openings in the former boundary wall (Protected Structure);

(2) Construction of a new mixed use District Centre, Student Residential Housing and Build-to-Rent Housing development in 2 buildings, a South Building and a North Building, separated by a new pedestrian and bicycle street connecting Prussia Street with the emerging Grangegorman SDZ campus. The buildings will range in height from 3-5 storeys on Prussia Street to 6-storeys (South building) and 8-storeys (North Building) towards to GDA campus.

(3) District Centre development accommodating: -

- Part-licensed supermarket, 11 no. retail/non-retail service units and 2 no. licensed café/restaurant units at ground floor;
- Two vehicular entrances from Prussia Street to provide access for deliveries and services (South entrance) and to provide access to undercroft parking and van deliveries (North entrance);
- Standing areas for deliveries and waste collection in designated service yards (South Building) and for car parking for 111 no. cars, light van deliveries and bicycle parking (North Building);
- All associated ancillary facilities, landscaping and boundary treatments including acoustic attenuation measures where required.

(4) Student residential accommodation overhead the District Centre accommodating 11 no. student houses comprising **143 no. apartments** (including 28 no. studios), with a total of 584 bedspaces (556 bedrooms) and associated balconies;

- The North Building student residential accommodation has reception and student amenities (conciierge, café, lounge areas) at ground, mezzanine and first floor levels, with access to all levels overhead and a first floor level podium garden from which student apartments and student amenity areas (study centre, a recreation centre and laundry) are accessible; 2 no. amenity terraces with pergola structures at fourth floor.
- The South Building student residential accommodation has ground floor level foyer with access to all levels, staff rooms, fitness centre at ground and mezzanine levels and a first floor level podium garden from which student apartments are directly accessible.

(5) Build-to-rent residential accommodation overhead the supermarket with lift and stair access from Prussia Street, comprising 29 no. apartments with balconies (28 no. 2 bedroom and 1 no. 3 bedroom units) and 3 no. 2 bedroom townhouses, laundry room, lounge/games room, bicycle store, waste store and podium garden with conservatory allotments.

6) The proposed new street will connect to the Grangegorman SDZ campus via a portal connection through a former boundary wall

7) The development includes art display along the new street, landscaping, boundary treatments, signage, plant and substations, and all associated site works and services.

A management company will control the operational phase of development.

3.2.2 Foul & Surface Water Drainage

It is proposed to discharge foul water from the proposed development to the existing combined sewer on Prussia Street. Suitable grease traps will be installed from wash down and food preparation areas prior to discharge into the on-site foul sewerage system.

Storm water drainage from the proposed development has been designed in accordance with the GDSDS and ensures that Best Management Practice has been incorporated into the design. The existing development currently comprises impermeable hard standing areas (existing buildings and surface car parking). The proposed surface water measures

are aimed at improving the general surface water management of the site, by introducing interceptors, attenuation measures and by restricting the ultimate discharge off site.

Storm water from the roof areas of the proposed building units will be directed via rain water pipes into an on-site reticulation system. The outflow from this system will be connected into the surface water drainage network collecting run-off from the car parking areas and will be discharged directly into an attenuation system.

Storm water from all car park areas and access roads will be collected via a series of on-site gullies and drain into a separate system of below ground gravity storm water sewers. Prior to discharging into the proposed attenuation system the storm water from the car park and access roads will be directed through appropriately sized petrol interceptor(s).

It is proposed to restrict the outflow from the subject site by installing a Hydrobrake facility, limiting the ultimate discharge to 7l/s. It is proposed to ultimately discharge surface water from the proposed development via gravity sewer networks and connect into the combined sewer on Prussia Street.

Water pollution will be minimised by the implementation of good construction practices, as outlined in *Control of Water Pollution from Construction Sites, Guidance for Consultants and Contractors – C532 CIRIA Report (Masters-Williams et al, 2001)*. Such practices will include adequate bunding for oil containers, wheel washers and dust suppression on site roads, and regular plant maintenance.

Whilst the implementation of such measures during construction will assist in minimising impacts on the local environment, the implementation of these measures has not been taken into consideration in this screening report when reaching a conclusion as to the likely impact of the development on Natura 2000 sites.

Full details of the proposed development can be found in the plans and particulars submitted with the application.

4. EIA Screening

Screening is the term used to describe the process for determining whether a proposed development requires an EIA by reference to mandatory legislative threshold requirements or in the case of sub threshold development, by reference to the type and scale of the proposed development and the significance or the environmental sensitivity of the receiving baseline environment.

The first step is to consider whether the project is of a type listed in Annex I or Annex II of the EIA Directive (or any transposing national legislation). If this does not provide a clear screening outcome then the nature and extent of the project and the site and the types of potential effects are examined. The totality of the project is considered, including off-site and secondary projects as well as indirect, secondary and cumulative impacts.

Project Type

Projects requiring EIA are defined in Article 4 and set out in Annexes I and II of the Directive.

All projects listed in Annex I require an EIA. For projects listed in Annex II, national authorities may set thresholds/criteria or determine effects on a case by case basis.

Where a project is of a specified type but does not meet, or exceed, the applicable threshold then the likelihood of the project having significant effects on the environment needs to be considered. This is done by reference to the criteria specified in Annex III of the Directive.

National Thresholds

Schedule 5 of the Planning and Development Regulations 2001 (as amended) transposes Annex I and II into Irish law. Part 2 of Schedule 5 includes the following Annex II infrastructure projects and thresholds that are of relevance to the proposed development.

10. Infrastructure projects –

*(b) (i) Construction of **more than 500 dwelling units.***

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

*(b) (iv) Urban development which would involve **an area greater than 2 hectares** in the case of a business district, **10 hectares** in the case of other parts of a built-up area and 20 hectares elsewhere.*

(In this paragraph, “business district” means a district within a city or town in which the predominant land use is retail or commercial use.)

Built-up area means a city or town (where “city” and “town” have the meanings assigned to them by the Local Government Act, 2001) or an adjoining developed area.

The proposed development provides for a total of 175 no. dwelling units including 143 no. student apartments and 32 no. co-living units. Therefore, a mandatory EIAR is not required in respect of 10(b)(i).

The District Centre (retail) will have a gross area of 3,785m². Therefore, a mandatory EIAR is not required in respect of 10(b)(iii).

In terms of land area, the site extends to 1.2 hectares. The site area is zoned as a District Centre and can be considered to be a business district where the predominant land use is retail and commercial. The site area is below the 2 ha. threshold. Therefore, a mandatory EIA is not required in respect of 10(b)(iv).

Sub-threshold Projects requiring EIA

Schedule 5 Part 2 of the Planning and Development Regulations, 2001 (as amended) requires further consideration of projects that do not exceed thresholds, having regard to criteria set out in Schedule 7.

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

For the purposes of this screening, the updated criteria set out in Schedule 7 and Schedule 7A of the Planning and Development Regulations, 2001 (as amended) will be considered.

EIA Screening Exercise

Article 299(B)(1)(b)(ii)(II) of the Planning & Development Regulations, 2001 (as amended) requires the following information:-

- (A) the information specified in Schedule 7A,
- (B) any further relevant information on the characteristics of the proposed development and its likely significant effects on the environment, and
- (C) a statement indicating how the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive have been taken into account.

Article 299(B)(1)(C) requires:-

The information referred to in paragraph (b)(ii)(II) may be accompanied by a description of the features, if any, of the proposed development and the measures, if any, envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment of the development [emphasis added].

Schedule 7A requires the following information be provided by the applicant for the purposes of screening sub-threshold development for EIA.

1. A description of the project, including in particular:

- (a) a description of the physical characteristics of the whole project and, where relevant, of demolition works;*
- (b) a description of the location of the project, 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 project.

3. A description of any likely significant effects, to the extent of the information available on such effects, of the project on the environment resulting from:

- (a) the expected residues and emissions and the production of waste, where relevant;*
- (b) the use of natural resources, in particular soil, land, water and biodiversity.*

4. The criteria of Annex III shall be taken into account, where relevant, when compiling the information in accordance with points 1 to 3.

In this report, therefore, the information has been set out under the more detailed headings provided for under Annex III, which corresponds to Schedule 7. In effect, this ensures that

all of the information required under Schedule 7A has been furnished. It also presents the information in a manner that facilitates the competent authority in addressing the appropriate criteria in its screening assessment.

The information in the tables below complies with the requirements of Article 299(B)(1)(b)(ii)(II)(A) and (B).

A. Characteristics of the project

The characteristics of projects must be considered, with particular regard to:

Criteria	
(a) the size and design of the whole project;	<p>The proposal provides for c. 25,750m² of development on a 1.2 ha site. The existing shopping centre will be demolished. The proposal will be an intensification of development on an under-utilised brownfield inner city site.</p> <p>Significant negative effects on the environment are not likely to arise.</p>
(b) cumulation with other existing and/or approved projects;	<p>The development site is located in the inner city adjacent to the TU Dublin Grangegorman Campus, which is currently being developed under the provisions of the GDA SDZ scheme as approved and modified by ABP.</p> <p>The subject site benefits from an extant permission (Ref. 2038/17) for demolition and redevelopment of the site to accommodate Student Accommodation and a new District Centre in a development of c. 20,350m². Along with other changes the current proposal provides an additional floor of accommodation.</p> <p>Details of recent permissions granted in the locality are contained within the Student Accommodation Concentration Report enclosed with the application. Other developments between the GDA campus and Prussia Street are at design stage but these have not been presented as planning applications.</p> <p>It is considered that cumulative impacts with other existing and/or approved projects are not likely to cause significant negative effects on the environment.</p>
(c) the use of natural resources, in particular land, soil, water and biodiversity;	<p>The project will involve the development of c. 1.2 hectares of land zoned Z4 District Centre.</p> <p>There are no ecologically sensitive habitats on site. The principal habitat is classified as Buildings and artificial surfaces. There is an area of Amenity Grassland to the east. There are no trees on site that would provide habitat for bats or birds. Overall, biodiversity within the site is very low.</p> <p>The <i>Landscape Design Report</i> and associated reports enclosed provide details of the planting to be provided as part of the proposed development, on the ground and podium levels.</p> <p>There will be landscaped open space provided at podium level within</p>

	<p>the site. The landscaped area will be planted with a variety of planting.</p> <p>In the long term there will be a positive effect on biodiversity as a result of the enhanced planting.</p> <p>The proposed development will not involve any significant use of natural resources in terms of land, soil and water.</p> <p>Significant negative effects on the environment are not likely to arise.</p>
(d) the production of waste;	<p>Construction & Demolition Waste An <i>Outline Construction and Demolition Waste Management Plan (OCDWMP)</i> is enclosed with the application. The Plan sets out measures to ensure that waste arisings during the construction and demolition phase will be managed and disposed of in a way that ensures the provisions of the Waste Management Acts 1996 - 2008 and associated Regulations and the Eastern Midlands Region Waste Management Plan are complied with. It will also ensure that optimum levels of waste reduction, re-use and recycling are achieved.</p> <p>Operational Waste An <i>Operational Waste Management Plan (OWMP)</i> is enclosed with the application. The OWMP aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible. The OWMP also seeks to provide guidance on the appropriate collection and transport of waste to prevent issues associated with litter or more serious environmental pollution (e.g. contamination of soil or water resources). The plan estimates the type and quantity of waste to be generated from the proposed development during the operational phase and provides a strategy for managing the different waste streams.</p> <p>Surface Water Sewer It is proposed to use a Sustainable Urban Drainage System (SUDS) approach to surface water management.</p> <p>It should be noted that the existing development currently comprises of impermeable hard standing areas (existing buildings and surface car parking) and the proposed surface water measures are aimed at improving the general surface water management of the site, by introducing interceptors, attenuation measures and by restricting the ultimate discharge off site, etc.</p> <p>It is proposed to ultimately discharge surface water from the proposed development, post attenuation, via gravity sewer networks and connect into the 2 manholes located just off Prussia Street.</p> <p>Foul Water Strategy It is proposed to discharge foul water from the proposed development, via gravity foul sewer network and connect into the existing combined sewer at 2 locations.</p> <p>It is proposed that all foul water from the proposed development will be collected on site via a series of on-site foul sewers. Suitable grease traps will be installed prior to discharge into the aforementioned proposed on-site foul system.</p> <p>Significant negative effects on the environment are not likely to arise due to production of waste.</p>

(e) pollution and nuisances;	<p>Standard best practice methods will be employed during construction to mitigate potential impacts from pollution on the environment during construction.</p> <p>There will be potential for noise and dust nuisance during construction. Standard noise and dust prevention measures will be employed.</p> <p>Significant negative effects on the environment are not likely to arise due to pollution or nuisance.</p>
(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;	<p>Standard construction practices will be employed throughout the construction phase. The subject lands are not proximate to any Seveso site.</p> <p>A Flood Risk Assessment has been carried out for the proposal. The proposed development of the site will not pose any flooding issues.</p> <p>Based on the indicative flood mapping, the development site is located within Flood Zone C “Low Probability”. The site is classified as “Less Vulnerable” and therefore the development is classified as appropriate.</p>
(g) the risks to human health (for example due to water contamination or air pollution).	<p>Foul water will discharge to the public sewer. Surface water will discharge to the public sewer following attenuation.</p> <p>No impact on air quality is envisaged due to the nature (residential and commercial) and scale of the project.</p>

In summary, the characteristics of the project will not generate significant negative impacts on the environment.

B. Location of the project

The environmental sensitivity of geographical areas likely to be affected by projects must be considered, with particular regard to:

Criteria	
(a) the existing and approved land use;	<p>The lands are currently occupied by a District Shopping Centre and associated car parking, which will be removed to facilitate the proposed mixed-use development in accordance with the Development Plan zoning objective.</p>
(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;	<p>As the proposed development is to be located on a site which is currently occupied by a number of buildings there will be no significant loss of greenfield land, soil, water or biodiversity.</p>
(c) the absorption capacity of the	

<p>natural environment, paying particular attention to the following areas:</p>	
<p>(i) wetlands, riparian areas, river mouths;</p>	<p>The site is not located in close proximity to wetlands, riparian areas or rivers. Surface water will be attenuated and discharged following attenuation to the local sewer network.</p>
<p>(ii) coastal zones and the marine environment;</p>	<p>The site is not located close to the coastal or marine environment.</p>
<p>(iii) mountain and forest areas;</p>	<p>The proposed development site is not within or directly connected to any mountain or forest areas.</p>
<p>(iv) nature reserves and parks;</p>	<p>The proposed development is not within or directly connected to any nature reserves or parks.</p>
<p>(v) areas classified or protected under national legislation; Natura 2000 areas designated by Member States pursuant to Directive 92/43/EEC and Directive 2009/147/EC;</p>	<p>The site is not hydrologically or ecologically connected to any Natural Heritage Area. The <i>Appropriate Assessment Screening Statement</i> submitted with the application concludes that the proposal is not likely to have a significant effect on a Natura 2000 site.</p>
<p>(vi) 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;</p>	<p>The area is not located within such an area.</p>
<p>(vii) densely populated areas;</p>	<p>The immediate surrounding area is an existing inner-city area of medium population density.</p>
<p>(viii) landscapes and sites of historical, cultural or archaeological significance.</p>	<p>Landscape & Visual Impact A <i>Landscape & Visual Appraisal</i> of the proposal is enclosed with the application. The verified views of the proposal are objectively assessed. The appraisal concludes that the increased scale of development proposed is entirely appropriate. The design of the buildings has been carefully crafted to respond to a range of sensitivities. Their form, arrangement, massing, articulation and detail are combined to integrate with the existing buildings on and off Prussia Street, but also to sit comfortably with the approved SDZ development scheme in Grangegorman.</p> <p>Cultural Heritage A <i>Cultural Heritage Report</i> is enclosed with the application. The report includes an assessment of impact on built heritage including the Grangegorman boundary wall. Breaches of the wall are necessary to integrate the site and create the new E-W street. The retention of stretches of the wall will mark the former boundary of the Grangegorman institution. This response to the existing built heritage on the site retains a key part of the cultural contribution of the wall to the overall Grangegorman cultural landscape.</p>

	<p>Permission was granted in 2014 (ref. 3441/13) and extended to 2024 (Ref. 3441/13/X1), to allow demolition of the extent of this wall within the site.</p> <p>The report also provides details of archaeology on site, including a Recorded Monument. Recommendations for archaeological testing are included.</p>
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C. Type and characteristics of the potential impacts

The likely significant effects of projects on the environment must be considered in relation to criteria set out in points 1 and 2 of this Annex, with regard to the impact of the project on the factors specified in Article 3(1), taking into account:

Criteria	
(a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected); (b) the nature of the impact;	<p>No significant negative impact on the environment are envisaged.</p> <p>Overall the landscaping proposals will result in a long-term positive impact, significant at the local level, with the site capable of hosting a greater diversity of habitats.</p>
(c) the transboundary nature of the impact;	There are no transboundary impacts.
(d) the intensity and complexity of the impact;	No impacts of significant complexity or intensity are envisaged.
(e) the probability of the impact;	No significant negative impacts on the environment are envisaged.
(f) the expected onset, duration, frequency and reversibility of the impact;	No significant negative impacts on the environment are envisaged.
(g) the cumulation of the impact with the impact of other existing and/or approved projects;	It is considered that cumulative impacts with other existing and/or approved projects are not likely to cause significant effects on the environment.
(h) the possibility of effectively reducing the impact.	Overall the landscaping proposals will result in a long-term positive impact, significant at the local level with a greater diversity of planting.

Having regard to Article 299(B)(1)(C), as no significant adverse effects have been identified, no measures are recommended to avoid or prevent such impacts.

Other Relevant Assessments

As required under Article 299(B)(1)(b)(ii)(II)(C), the results of the Appropriate Assessment Screening Statement carried out under the provisions of the Habitats Directive have been taken into consideration in this report. It is noted that the AA Screening concludes that the proposed development, alone and in combination with other plans and projects, is not likely to have significant effects on a Natura 2000 site.

Screening Conclusion

The screening report has been prepared to accompany a pre-planning request to An Bord Pleanála for the development of a mixed-use commercial and residential development. The report provides relevant information to inform An Bord Pleanála's EIA screening at planning application stage.

The report has assessed the potential impact of the proposed development on the environment. The proposed development is below the thresholds for mandatory EIA. It is considered that a sub-threshold EIA is not required for the following reasons:-

- Surface water will discharge to the local drainage network in accordance with SUDs.
- No impacts on Natura 2000 sites are envisaged.
- New planting as part of the development will result in long term benefits to biodiversity.

Therefore, no significant effects on the environment are envisaged.

Conclusion

No significant negative effects on any of the environmental factors to be considered under the EIA Directive are anticipated as a result of the proposed development.

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