



EIAR SCREENING STATEMENT

PROPOSED SHD SCHEME ON LANDS ADJOINING CLONKEEN COLLEGE,
CLONKEEN ROAD, BLACKROCK, CO. DUBLIN

PREPARED FOR:

CLONKEEN INVESTMENTS DAC

PREPARED BY:

TOM PHILLIPS + ASSOCIATES
TOWN PLANNING CONSULTANTS
80 HARCOURT STREET
DUBLIN 2
D02 F449

SEPTEMBER 2021

1.0 INTRODUCTION

This Environmental Impact Assessment Report (EIAR) Screening is submitted by Tom Phillips + Associates (TPA), Town Planning Consultants on behalf of our Client, Clonkeen Investments DAC, in respect of the proposed residential development of lands at the above location.

In summary, Clonkeen Investments DAC is seeking permission for residential development on a c. 3.3 ha site on residentially zoned lands adjoining Clonkeen College. The site is located within a mature residential area and is surrounded by existing residential developments, which generally comprise semi-detached and terrace housing, the back gardens of which back onto the site. The adjoining existing school buildings are confined to the northern end of their own lands, which generally comprise two storey, flat roofed buildings, and a single storey element with a pitched roof. These are separated by the subject site by the school playing fields. The proposed development can be summarised as follows;

“Clonkeen Investments DAC intend to apply to An Bord Pleanála (the Board) for permission for a Strategic Housing Development with a total application site area of c. 3.3 ha, on a site located at Lands Adjoining Clonkeen College, Clonkeen Road, Blackrock, Co. Dublin. The development, with a total gross floor area of c 33,851 sq m, will provide 299 no. residential units and a 1 no. storey 353 sq m childcare facility with dedicated play area 231 sq m. The development will consist of 18 no. ground floor 3 bedroom duplex apartments and 18 no. 2 bedroom apartments above and 12 no. ground floor 2 bedroom apartments with 12 no. 3 bedroom duplex apartments above. The 60 no. duplex units are arranged in 6 no. three storey blocks. The development will also consist of 239 no. apartment units (111 no. 1 bedroom apartments, 120 no. 2 bedroom apartments and 8 no. 3 bed apartments) arranged in 4 no. 6 storey blocks over 1 no. storey basement; public open space, communal open space and private open space (including all balconies, terraces and individual unit gardens at all levels); 614 sq m communal resident facilities including concierge and welcome area (195 sq m), residents’ flexible work facility (219 sq m), residents’ lounge (100 sq m) and residents’ gym area (100 sq m).

The development will also provide for the demolition of the 2 no. storey office building (‘St. Helen’s’, Meadow Vale - 470 sq m) to facilitate new vehicular, pedestrian and cyclist access to the site, to the north of the proposed development via Meadow Vale.

The development will also include the provision of 2 no. designated play areas; internal roads and pathways; bin stores; 248 no. car parking spaces, including 167 no. at basement level and 2 no. shared vehicle (GoCar) spaces, 388 no. bicycle parking spaces, and 10 no. motorcycle parking spaces at basement and surface level; hard and soft landscaping; plant; boundary treatments including the repair and replacement of some existing boundary treatments; the provision of new surface water and foul drainage pipes and any required pipe diversion works or build over works; internal foul pumping station; a new internal access road and paths; changes in level; services provision and related pipework, ducting and cabling; electric vehicle charging points; 4 no. stormwater attenuation tanks; 1 no. ESB substation; photovoltaic panels; SUDS including green roof provision; signage; provision for future pedestrian access to Monaloe Park to the east of the development, including the provision of a pedestrian bridge, extending over the drainage ditch; public lighting and all site development and excavation works above and below ground.”

The purpose of this Report is to provide:

- An assessment of the proposed development in the context of the relevant thresholds for this form of development (residential), which require the preparation of a mandatory Environmental Impact Assessment Report (EIAR);
- An assessment of sub-threshold considerations for the proposed development, and
- An outline of the scope and content of the proposed Planning Application including all relevant assessments, which we propose to submit in lieu of a formal EIAR regarding the proposed development.

This Report has had regard to the *EIA Guidance for Consent Authorities regarding Sub-threshold Development* (guidance), which was published by the then Department of the Environment, Heritage and Local Government in August 2003. We have also considered the provisions of the *Environmental Impact Assessment of Projects (EIAR) Guidance on Screening* published by the European Union in 2017. The Screening Checklist included in that document is enclosed as Appendix A to this Report.

1.1 Summary

In summary, having regard to the relevant thresholds set out in Schedule 5 of the *Planning and Development Regulations 2001 (as amended)* regarding mandatory EIS (now EIAR) provision for this form of development, in our opinion, the subject proposal comprises a sub-threshold development.

Secondly, according to the *EIA Guidance for Consent Authorities regarding Sub-threshold Development, August 2003*, a formal EIAR would not be required for this particular development. This is due, *inter alia*, to the development site area (c. 3.3 ha) and its locational characteristics, the proposed number of residential units (299 no.) and the fact that this proposal is unlikely to give rise to significant environmental effects.

Thirdly, while it is considered that a formal EIAR is not required in this instance, it is proposed that detailed and comprehensive assessments, as required, have been prepared and accompany the planning application, which assess and address all of the relevant potential planning and environmental issues pertaining to the subject development. These assessments inform development responses to the specific issues raised by the proposed scheme. The assessments enclosed with the application are also designed to address the issues raised by this type of development and provide the requisite levels of environmental assessment to the appropriate standards.

2.0 STATUTORY INSTRUMENTS

2.1 *Schedule 5 of the Planning and Development Regulations 2001 as amended*

Part X of the *Planning and Development Act 2000* (as amended) provides a basis in primary legislation for EIA. Part X of the Act establishes a framework for EIA with the detail provided in Schedules 5, 6 and 7 of the *Planning and Development Regulations 2001 as amended* (Regulations).



Schedule 5 of the Regulations sets out types of development for which mandatory EIA is required and is, therefore, an important reference point in the context of establishing the threshold for EIS preparation.

In terms of the different categories of development listed in Schedule 5 of the Regulations, the subject development relates to Part 2(10)(b)(i) and (iv) of the *Planning and Development Regulations 2001* as amended regarding 'Infrastructure Projects' respectively and provides the relevant area/development thresholds as follows:

'Construction of more than 500 dwelling units'

'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.)'

The proposed development in this case comprises 299 no. residential units, which is significantly below the above threshold. As such, it is considered that a mandatory EIAR is not required on the basis of number of dwelling units. This is further borne out by the EIAR Screening Checklist enclosed as Appendix A.

With regard to urban development and site area, the site is not located in an area that would be considered to comprise a 'business district' as per the above definition. The subject site is located in what would be considered a substantially suburban residential area, also characterised by an adjoining institutional (education) user. As such, the 2 hectare site area threshold does not apply here.

The subject site area is c. 3.3 ha, which is very significantly below the 'other parts of a built-up area' threshold of 10 hectares. Thus, having regard to the above thresholds and the nature of the subject proposal, it is submitted that a mandatory EIAR is not required in respect of this development.

2.2 EIA Guidance for Consent Authorities regarding Sub-threshold Development

The issue that consequently arises is whether the proposed development, which is sub-threshold, still warrants EIAR. In this regard, we have assessed the proposal against the criteria as identified in the *EIA Guidance for Consent Authorities regarding Sub-threshold Development* (guidance), which was published by the then Department of the Environment, Heritage and Local Government in August 2003.

The primary aim of this document is:

"To provide practical guidance for the competent/consent authorities in deciding whether or not a sub-threshold development is likely to have significant effects on the environment. The guidance should also assist developers and EIA practitioners in forming an opinion as to whether or not EIA would be appropriate to a specific sub-threshold development proposal".



The guidance also notes that:

‘Irish EIA legislation mirrors the mandatory requirement in the Directive to carry out EIA in respect of certain project classes. In many cases, Ireland has adopted a substantially lower threshold than set in the Directive.’

As illustrated above, the subject development is substantially below the mandatory EIA thresholds identified in the Regulations.

Paragraph 3.4 further states:

‘In light of the approach by Ireland (i) in setting mandatory thresholds for each of the Annex II project classes and (ii) in setting these thresholds at substantially lower levels than comparable Annex I thresholds in the Directive, the need for sub-threshold EIA should be fairly limited in Ireland’.

We concur with this statement and consider that the current proposal similarly does not require the preparation of a formal sub-threshold EIS.

Key Issues

The stated key issue for the competent/consent authorities in the context of the possible need for an EIA regarding sub-threshold developments is *‘whether or not such development is likely to have significant effects on the environment’*. The document, therefore, provides guidance to assist authorities in determining whether or not *“significant”* effects on the environment are likely in the context of sub-threshold development.

While the guidance acknowledges that *‘there are no hard and fast rules which can be applied’*, it sets out three criteria which competent/consent authorities must have regard to, in assessing whether or not the likely effects are *“significant”*.

The stated criteria for determining whether a development would or would not be likely to have significant effects on the environment are:

- *Characteristics of the Proposed Development;*
- *Location of the Proposed Development, and;*
- *Characteristics of Potential Impacts.*

The guidance also advises that particular attention should be paid to projects which are *‘close to the national statutory thresholds’*, which is not the case here as illustrated above.

Characteristics of the Proposed Development

The six sub-criteria which the guidelines identify as being important in terms of the characteristics of the proposed development are set out below. The relationship between the proposed development and each of these criteria is detailed below.



An amendment to the Regulations in 2008 referenced *'the nature of any associated demolition works'* as being a relevant characteristic for assessment. A 2 no. storey, 470 sq m office block (St. Helen's) is to be demolished on Meadow Vale to facilitate site access, however this is not deemed to be significant. On the basis that no significant demolition is proposed as part of this development, this is not considered a relevant assessment issue regarding the subject proposal.

Size of the Proposed Development

As previously outlined in Section 2.1, the subject development involves a site area of c. 3.3 ha and is situated in an area which would be classified as being *"other parts of a built-up area"*. The appropriate threshold for development in such areas is 10 hectares. The subject development, therefore, involves an area which equates to just c. 33% of this threshold.

The Cumulation with other Proposed Development

The guidance references the issue of cumulation with other projects. In this regard, a site layout plan has been submitted with the subject application that outlines how the proposed development integrates and responds to its surroundings. We note that currently no significant proposed development directly adjoins the site.

In terms of other permitted, but unbuilt, developments located outside the site but within its vicinity, the Applicant is cognisant of same and where there is a cumulative relationship between these developments and the subject proposal (e.g., sanitary services provision, water supply, cumulative traffic impact, etc), potential impacts have been assessed in a cumulative manner.

The Use of Natural Resources

The proposed development will not involve the use of natural resources; therefore, this is not a considered relevant consideration in terms of the subject proposal.

The Production of Waste

The production of waste is not considered a primary characteristic of the proposed development. Waste Management has been addressed as a part of the planning application (please refer to documentation prepared by AWN Consulting Engineers). This has been integrated into the overall management regime for the development, but has also been considered from a construction and demolition perspective.

Pollution and Nuisances

As with the production of waste, pollution and nuisances will not be primary characteristics of the proposed development. It is proposed that assessments of, *inter alia*, Landscape, Visual Impact, Ecological, Noise and Vibration and Traffic and Transportation Impact form part of the application and have been considered.



The Risk of Accidents, having regard to Substances or Technologies Used

It is proposed that the risk of accidents, having regard to substances or technologies used, will be extremely low in this case, given the nature of the proposed development.

Location of the Proposed Development

In terms of the location of the proposed development, the guidance identifies three sub-criteria which should be considered in the context of the environmental sensitivity of geographical areas likely to be affected:

“The existing land use;

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: Wetlands; coastal zones; mountain and forest areas; nature reserves and parks; areas classified or protected under legislation, including special protection areas designated pursuant to Directives 79/409/EEC¹ and 92/43/EEC²; areas in which the environmental quality standards laid down in legislation of the EU have already been exceeded; densely populated areas; and, landscapes of historical, cultural or archaeological significance.”

The existing land use of the site is a vacant site, in former use as a playing pitch associated with an adjoining education use. In this regard, the proposed development of the site for residential purposes, with a childcare facility, will accord with the existing long-established residential land use that characterises the wider area. It is not considered that the existing land use will be adversely affected in environmental terms by the proposed development, as per the Ecological Impact Assessment, Flood Risk Assessment, Landscape and Visual Impact Assessment and other environmental assessments enclosed with the application.

The natural resources in the area of the subject lands will be unaffected by the proposed development.

The absorption capacity of the natural environment of the proposed development are addressed in the assessments enclosed with the planning application, but this is considered good in terms of existing infrastructure provision and known future upgrades of infrastructure being available or made available to serve the site, as standard. This is outlined further in the enclosed documentation. In visual terms, the proposed new build elements have been very carefully considered and sited by the scheme architects pursuant to a detailed architectural assessment of the surrounding site context and review of potential impacts. Consideration was also given to feedback received by both Dún Laoghaire-Rathdown County Council and An Bord Pleanála in relation to design, height, scale and massing following the Section 247 process and the Section 5 Tripartite meeting.

In addition, the subject proposal is sensitively designed to ensure it respects adjoining development and seeks to minimise significant visual impact, where possible, through a combination of appropriate choice of materials and finishes and landscape design.

¹ Council Directive on the conservation of wild birds

² Council Directive on the conservation of natural habitats and of wild fauna and flora

It is considered that there is adequate absorption capacity to accommodate the scale of the proposed development in this particular location.

Furthermore, the areas noted above as requiring ‘*particular attention*’ in terms of sensitivity will not apply to the subject lands including:

- Wetlands (n/a);
- Coastal zones (n/a);
- Mountain and forest areas (n/a);
- Nature reserves and parks (n/a);
- Areas in which the environmental quality standards laid down in legislation of the EU have already been exceeded (n/a) and;
- Densely populated areas (n/a).

The site does constitute “*Landscapes of historical, cultural or archaeological significance,*” however, a detailed *Archaeological Impact Assessment* has been undertaken and no landscape designations are noted in the *Development Plan* in relation to the site. There are no protected structures on or near the site. A *Landscape and Visual Impact Assessment*, prepared by Doyle O’ Troithigh Landscape Architects has been completed in respect of the impacts of the proposed development and is included with the planning application. This includes an assessment of impacts of the proposed development and of 8 no. verified views surrounding the development.

This Report notes;

“The site is in a relatively enclosed area accessed off Meadow Vale. Housing bounds 3 sides of the site with the Clonkeen College campus to the north of the site. The housing that back onto the site will have visual impacts from the development particularly at the initial site development works and construction phase. The houses on the eastern side of the site have little existing boundary screening and the visual impacts will be greater than those on the southern and western boundaries where existing mature tree and garden vegetation provides a level of screening for the occupants. The lower 3-storey duplex units on the eastern boundary will minimise the level of negative visual impacts for these residents. The arrangement of the taller apartment blocks in the centre of the site with their gable facing the playing pitches reduces the potential visual impact on the school and playing pitches.”

Please refer to the Doyle O’Troithigh Assessment Report for further information on expected impacts and design mitigation measures adopted to reduce impact of the proposed development.

Characteristics of Potential Impacts

As previously outlined in above, there are no “*significant effects*” associated with the proposed development, primarily due to its characteristics (being significantly below all of the appropriate thresholds) and location (substantially within the existing built context of a well-established residential area). Therefore, the issues which Schedule 7 lists as being important to have particular regard to, including, *inter alia*, ‘*the extent of the impact (geographical area and size of the affected population)*’ and ‘*the transfrontier nature of the impact*’ are not considered to be applicable in this context.

Notwithstanding the above, detailed assessments accompany the planning application that provide a holistic and comprehensive analysis of the proposed development and an assessment of relevant potential planning and environmental impacts. Whilst not comprising an EIA in the formal legal sense, which we contend is not required in respect of this proposal, the enclosed documents provides the level of assessment required to an equivalent standard. A brief summary of the inputs included with the application is set out below:

- *A description of the characteristics of the site location and description of development;*
- *An overview of the planning history of the lands and an examination of any issues arising;*
- *A detailed analysis of the relevant planning policy guidance at a strategic, regional and local level;*
- *A Site Masterplan and Design Rationale;*
- *An Archaeological Assessment;*
- *A Landscape Rationale (including tree survey) and Masterplan;*
- *A Landscape and Visual Impact Assessment;*
- *A Daylight and Sunlight Assessment;*
- *An Ecological Impact Assessment, Breeding Bird Survey and Bat Survey (the latter two took place during the appropriate seasons);*
- *A Natura Impact Statement.;*
- *A Flood Risk Assessment and assessment of Sanitary Services;*
- *A Traffic Impact Assessment including a DMURS statement, Mobility Management Plan and Car Parking Rationale.*

These assessments inform development responses to the specific issues raised by the proposed scheme. The assessments enclosed with the application are also designed to address the issues raised by this type of development and provide the requisite levels of environmental assessment to the appropriate standards.



3.0 ARTICLE 299B AND 299C CONSIDERATIONS

Altemar Ltd., at the request of Clonkeen Investments DAC, have prepared a statement in accordance with Article 299B and C of the *Planning and Development Regulations 2001 to 2021* in relation to the proposed Strategic Housing Development. The statement is to provide information and assist An Bord Pleanála in completing an examination for the purposes of a screening determination in accordance with Articles 299B and 299C of the *Planning Regulations*.

In particular, it is provided so that the Board may have regard to *"the available results, where relevant, of preliminary verifications or assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive"* in accordance with Article 299C(1)(a)(iv) of the *Planning Regulations*.

The statement summarises the assessments carried out the proposed development and identifies that there is no *"significant and realistic doubt in regard the likelihood of significant effects on the environment arising from the proposed development"*. As a result of the statement, An Bord Pleanála is able to carry out their assessment in relation to Articles 299B and 299C of the Planning Regulations. Please refer to the enclosed Statement in Accordance with Article 299 B, prepared by Altemar Ltd.

4.0 DIRECTIVE 2001/42/ EC, SEA DIRECTIVE

Strategic Environmental Assessment or SEA is the term which has been given to the environmental assessment of plans and programmes, which help determine the nature and location of individual projects taking place. Directive 2001/42/EC of the European Parliament and of the Council of Ministers, of 27th June 2001, on the Assessment of the Effects of Certain Plans and Programmes on the Environment (SEA Directive). The SEA Directive was transposed into Irish Law through the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (Statutory Instrument Number (SI No. 435 of 2004) and the Planning and Development (Strategic Environmental Assessment).

A Strategic Environmental Assessment (SEA) Environmental Report has been prepared for the *Dún Laoghaire-Rathdown County Development Plan 2016-2022*. It has been undertaken by CAAS Ltd. on behalf of Dún Laoghaire-Rathdown County Council. The Plan sets out an overall strategy for the proper planning and sustainable development of the functional area of Dún Laoghaire- Rathdown County Council for the period 2016- 2022.

Reports in the current submission that are relevant to this Directive include the Environmental Impact Assessment Screening Report, Planning Report, Statement of Consistency and the Material Contravention Statement, all of which have been completed and enclosed by Tom Philips Associates.

The *Dún Laoghaire-Rathdown County Development Plan 2016-2022* has been consulted throughout the process of the design and preparation of assessment reports for this project. The *Dún Laoghaire-Rathdown County Development Plan 2016-2022* has been informed by the SEA Environmental Report for the *Dún Laoghaire-Rathdown County Development Plan 2016-2022*. As a result, no further assessment in relation to DIRECTIVE 2001/42/ EC, SEA DIRECTIVE is required.

5.0 WATER FRAMEWORK DIRECTIVE

As outlined in the Natura Impact Statement, prepared by MKO Ecology;

“The 2020 Q-Value for the Kill o’ the Grange Stream measured just upstream of the proposed development site at Footbridge Meadowvale was 3 (poor), as was the 2000 Q-Value measured at the Bridge on Johnstown Road, about 0.6km downstream and the 2020 Q-Value measured at Killiney Hill Road Bridge about 5km downstream of the proposed development site. The river waterbody Water Framework Directive (WFD) status 2013-2018 for the Kill o’ the Grange Stream was ‘poor’ and river waterbodies risk was deemed ‘at risk’. The coastal water quality 2010-2012 of Southwestern Irish Sea – Killiney Bay (HA10) was ‘unpolluted’. The coastal waterbody WFD status 2013-2018 for the same area was ‘high’ and coastal waterbodies risk was deemed ‘not at risk’.”

As outlined in the Ecological Impact Statement, prepared by Altemar Ecology;

“Watercourses and surface runoff are seen as the main potential pathway for impacts on biodiversity outside of the site. The site is proximate to drainage ditch which flows into the Kill Of The Grange Stream which flows to Killiney Bay. However, no designated sites are located downstream of the proposed development and foul water will discharge to the Shanganagh WWTP. There is no direct or indirect hydrological pathway from the proposed development site to a designated site. Mitigation measures have been developed to reduce impacts on biodiversity to non-significant levels. The overall impact on the ecology of the proposed development will result in a Negligible/adverse/international/ negative impact/Not significant/long term residual impact on the ecology of the site and locality overall.”

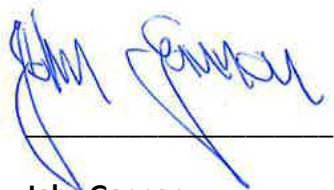
Following the implementation of the above referenced measures the proposed development will not cause any significant effect on surface water or coastal water status.

6.0 CONCLUSION

Collectively, it is envisaged that these assessments provide a holistic and comprehensive analysis of the proposed development and its planning and environmental implications.

We trust that this information fully addresses the issue of EIAR screening and that, in this particular case, an EIAR is not required in respect of this development.

Yours faithfully



John Gannon
Director
Tom Phillips + Associates



Appendix A EIAR Screening Checklist

Questions to be Considered For further guidance on factors to be considered see the more detailed questions listed in the Scoping Guidance	Yes/ No/? Briefly describe	Is this likely to result in a significant impact? Yes/ No/?- Why?
Will construction, operation, decommissioning or demolition works of the Project involve actions that will cause physical changes in the locality (topography, land use, changes in waterbodies, etc.)?	Yes. The development will comprise the provision of a new residential development and additional population on a currently vacant, former part of school playing fields. Thus, a new land use will be established on the site.	No. The adjoining area is characterised by significant residential development and zoning designation for the site permits residential development in the statutory Development Plan for the area.
Will construction or the operation of the Project use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or are in short supply?	No. Whilst zoned serviced urban land is a scarce resource in Dublin, the proposed scheme will deliver a sustainable residential proposal that ensures the site will be efficiently used.	No.
Will the Project involve the use, storage, transport, handling or production of substances or material which could be harmful to human health, to the environment or raise concerns about actual or perceived risks to human health?	No, other than the small amounts typically used in residential households.	No.
Will the Project produce solid wastes during construction or operation or decommissioning?	Yes. Construction activities, such as basement excavation and demolition of an existing office, will be subject to on-site management, as per the enclosed documentation.	No. Whilst the development will require small scale demolition and the excavation and transport of soil, this is not considered significant in the context of a residential development.
Will the Project release pollutants or any hazardous, toxic or noxious substances to air or lead to exceeding Ambient Air Quality standards in Directives 2008/50/EC and 2004/107/EC)?	No. The development comprises a residential proposal that will not give rise to pollutants. Construction activities, such as basement excavation, will be subject to on-site management, as per the enclosed documentation. An assessment of asbestos within the development has been completed and is considered in on-site management, as per the enclosed documentation which will prevent any asbestos material from being released.	No.
Will the Project cause noise and vibration or the releasing of light, heat energy or electromagnetic radiation?	Yes. During the construction phase of the project there will be a short-term noise impact on nearby noise sensitive properties from site activities and the close proximity	No. The development comprises a residential proposal that will not give rise to light, heat energy or electromagnetic radiation.



	<p>of adjacent buildings. The application of binding noise limits, hours of operation, along with implementation of appropriate noise and vibration control measures, will ensure that noise and vibration are kept to minimised. For nearby noise sensitive locations within 30 m potential negative, significant and short-term effects are likely.</p>	<p>With the application of mitigation measures for building services noise, the range of potential noise levels is not expected to add significantly to the existing noise environment. The resultant noise effect from this source will be of neutral, not significant, long-term impact. The predicted change noise levels associated with additional traffic is not predicted to have a significant impact. In the context of the existing noise environment, the overall effects from noise contribution of increased traffic is considered to be negative, not significant and long-term effect at nearby noise sensitive locations. Construction activities will be subject to on-site management and monitoring, as required, to alleviate any short term impacts.</p>
<p>Will the Project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?</p>	<p>No. The development will connect to the existing public mains water supply and drainage systems. Construction management will ensure no impacts will affect surface or ground water.</p>	<p>No.</p>
<p>Will there be any risk of accidents during construction or operation of the Project that could affect human health or the environment?</p>	<p>No. Best construction practice will mitigate the risk of accidents during the construction stage.</p>	<p>No.</p>
<p>Will the Project result in environmentally related social changes, for example, in demography traditional lifestyles, employment?</p>	<p>No. The new residential development will add to the local population but this is not deemed a significant impact. No traditional lifestyles or employment will be affected as a result of this development.</p>	<p>No.</p>
<p>Are there any other factors that should be considered such as consequential development which could lead to environmental impacts or the potential for cumulative impacts with other existing or planned activities in the locality</p>	<p>No. There are no significant planned developments in the area that will give rise to cumulative impacts. Consideration has been given to cumulative impacts of adjoining developments, as outlined above, in individual assessments and Reports.</p>	<p>No.</p>
<p>Is the Project located within or close to any areas which are protected under international, EU, or national or local legislation for the ecological, landscape, cultural or other value, which could be affected by the Project?</p>	<p>No. This is confirmed in the assessments included with the planning application.</p>	<p>No.</p>



<p>Are there any other areas on or around the location that are important or sensitive for reasons of their ecology eg. Wetlands, watercourses or other waterbodies, the coastal zone, mountains, forests or woodlands that could be affected by the Project?</p>	<p>No. The site does not directly adjoin any environmentally sensitive areas as confirmed in the Natura Impact Statement enclosed with the planning application along with an Ecological Impact Assessment.</p>	<p>No.</p>
<p>Are there any areas on or around the location that are used by protected, important or sensitive species of fauna or flora eg. For breeding, nesting, foraging, resting, overwintering, migration which could be affected by the project?</p>	<p>Yes. The adjoining school playing pitches are in use by birds for feeding purposes. This has been confirmed in the ecological assessment, bat survey, wintering bird and breeding bird survey that are included with the planning application.</p>	<p>No. The Wintering Bird Surveys undertaken on site can be concluded as follows (as per conclusion of the MKO Survey);</p> <p>“Of the wintering waterbirds recorded during surveys, the potential for direct/indirect habitat loss effects was identified for black-headed gull, brent geese, curlew and oystercatcher. Following consideration of the effects, it is concluded that the proposed development is not predicted to result in any significant effects on any of these species. No significant effects on receptors of International, National or County Importance were identified. In addition, no adverse effects are predicted for any SPA populations of black-headed gull, brent geese, curlew or oystercatcher.”</p> <p>And</p> <p>“When presented with an obstacle in the landscape birds take evasive action to avoid a collision. For example, geese are predicted to avoid colliding with a moving object like an operating turbine 99.8% of the time (SNH, 2013). A prominent, large, stationary object like the proposed development is predicted to pose a negligible risk of collision. Significant effects are not predicted.”</p> <p>Further information on this is provided in the MKO NIS Report and associated Wintering Bird Surveys.</p> <p>In addition, the site has been surveyed for flora and fauna by</p>



		<p>Altamar Ltd. Please refer to enclosed Ecological Impact Assessment. This Assessment concludes;</p> <p><i>“No significant environmental impacts are likely in relation to the construction or operation of the proposed development.”</i></p> <p>The project Ecologist has also made specific recommendations to the landscape architect in relation to planting considerations to assist with promotion of pollinators and bat populations.</p>
Are there any inland, coastal, marine or underground waters (or features of the marine environment) on or around the location that could be affected by the Project?	No. The site is not located in proximity to any inland or other waters that will be affected by this development. An adjoining drainage ditch has been suitably assessed from both a drainage perspective, as well as for ecological significance and included in assessments accordingly.	No.
Are there any features of high landscape or scenic value on or around the location that could be affected by the Project?	No. No surrounding lands have been designated as being of high landscape or scenic value. A Landscape and Visual Impact Assessment Report has been provided as part of the planning application and is included accordingly.	No.
Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the Project?	No. The site is not open to the public at present. Careful consideration of the adjoining playing pitches has been included and protected from impacts in the Construction Environmental Management Plan submitted with the planning application.	No.
Are there any transport routes on or around the location that are susceptible to congestion or which cause environmental problems, which could be affected by the Project?	No. The Transport and Traffic assessment enclosed with the planning application confirms that the surrounding road network and transportation routes can accommodate the proposed development.	No.
Is the Project in a location in which it is likely to be highly visible to many people?	Yes. As the proposed development is 6 no. storeys at its highest point and the surrounding context is of 1 to 2 no. storey housing developments. A Landscape and Visual Impact Assessment has been carried out as part of this	No.



	application. This Report concludes that the proposed development will be visible to many people, however this impact is deemed to be acceptable. Several design and landscape interventions have been included in the proposed development to mitigate this impact.	
Are there any areas or features of historic or cultural importance on or around the location that could be affected by the Project?	No.	No.
Is the Project located in a previously undeveloped area where there will be loss of greenfield land	Yes. While the site itself is undeveloped, it previously formed a part of a wider educational use and are not accessible or open to the public.	No. The lands have no amenity value, are secured behind private fencing and at present are unavailable for public use. The proposed development will open up the site for public open space, residential use and the community may avail of a childcare facility on site.
Are there existing land uses within or around the location e.g. homes, gardens, other private property, industry, commerce, recreation, public open space, community facilities, agriculture, forestry, tourism, mining or quarrying that could be affected by the Project?	Yes. The site adjoins existing residential developments on its boundaries and adjoining school playing fields.	No. The subject development is carefully designed to ensure no adverse impacts on the amenities of these properties will arise.
Are there any plans for future land uses within or around the location that could be affected by the Project?	No. All existing land uses in the site vicinity are well established comprising residential and institutional.	No.
Are there areas within or around the location which are densely populated or built-up, that could be affected by the Project?	Yes. The site is located within a well-established existing suburban area.	No. The subject development is carefully designed to ensure no adverse impacts on the amenities of these uses will arise.
Are there any areas within or around the location which are occupied by sensitive land uses e.g. hospitals, schools, places of worship, community facilities that could be affected by the Project?	Yes. The site adjoins school playing fields.	No. The subject development is carefully designed to ensure no adverse impacts on the amenities of these uses will arise. In addition, a detailed Construction Management Plan is provided, to alleviate any impacts at construction stage.
Are there any areas within or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, that could be affected by the Project?	No.	No.
Are there any areas within or around the location which are	No.	No.



already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, that could be affected by the Project?		
Is the Project location susceptible to earthquakes, subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions e.g. temperature inversions, fogs, severe winds, which could cause the Project to present environmental problems?	No.	No.