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MCGILL PLANNING

Environmental Impact Assessment Screening Report

PROPOSED LARGE SCALE RESIDENTIAL DEVELOPMENT (LRD) COMPRISING STUDENT ACCOMMODATION AT 21-23 BLACKPITTS, DUBLIN 8.

Prepared by MCG Planning
On behalf of Blackpitts Residence Unlimited Company
JULY 2025

CONTENTS

INTRODUCTION

On behalf of the applicant, Blackpitts Residence Unlimited Company, this Environmental Impact Assessment (EIA) Screening Statement accompanies an LRD application to Dublin City Council under Section 32D of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 for a proposed Large Scale Residential Development student accommodation at 21-23 Blackpitts, Dublin 8.

The Environmental Screening Report has been prepared to assess the potential impacts on the environment arising from the proposed development at the subject site. The full details of the scheme are as follows:

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Delivering 217 student bed spaces (209 single rooms and 4 twin rooms, 213no. rooms in total), within one block. The blocks ranges in height up to 6 storeys with a basement below. All associated internal and external amenity space, including the provision of restaurant/café, on street carparking, cycle parking, landscaping, bin stores, service provision and all other associated site development works.

The statement is prepared with direct input from the design team, who include Horan Rainsford Architects, JBA Consulting Engineers and Scientists Limited, Passive Dynamics, JJ Campbell & Associates Civil and Structural Engineers, AtkinsRéalis Consulting Engineers, Altemar Environmental Consultants, ModelWorks, Ayesa Engineering, Archaeology & Built Heritage Ltd, Traynor Environmental, Dynamic Design & Global Apartment Advisors and demonstrates that the possible effects on the environment have been examined through the process of an EIA Screening (detailed below) and confirms that the most appropriate form of development is delivered at this site.

PURPOSE OF THIS STATEMENT

The purpose of the Environmental Screening Statement is to demonstrate that there is no requirement for the preparation of an Environmental Impact Assessment Report (EIAR) for the proposed development and to identify any likelihood of significant effects on the environment that might arise. In the first instance it is noted that this development, in terms of scale/quantum and/or site area, is below any mandatory EIAR threshold prescribed by Directive 2011/92/EU, as amended by Directive 2014/52/EU (together 'the EIA Directive'), and as transposed into Irish law.

This report is supported and informed by accompanying documentation prepared by Altemar and submitted as part of this application.

EIA SCREENING AND METHODOLOGY

The EIA Screening exercise has been guided by the following legislation and guidance:

- Planning and Development Act 2000 (as amended) ('the 2000 Act');
- Planning and Development Regulations 2001 to 2023 ('the Planning and Development Regulations');
- Guidelines on Information to be Contained in an Environmental Impact Statement (EPA 2002).
- Study on the Assessment of Indirect & Cumulative Impacts as well as Impact Interaction (DG Environment 2002).
- Environmental Impact Assessment (EIA), Guidance for Consent Authorities Regarding Sub- Threshold Development (DoEHLG 2003).
- EIA Directive 85/337/EC (as amended by Council Directive 97/11/EC, Directive 2003/35/EC, Directive 2009/31/EC, Directive 2011/92/EU and Directive 2014/52/EU.

- European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) – transposed Directive 2014/52/EU into Irish law.
- Environmental Impact Assessment of Projects – Guidance on the Preparation of the Environmental Impact Assessment Report (European Commission 2017)
- Environmental Impact Assessment of Projects – Guidance on Screening (European Commission 2017)
- Environmental Impact Assessment of Projects – Guidance on Scoping (European Commission 2017)
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (Department of Housing, Planning and Local Government, 2018).
- Guidelines on the information to be contained in Environmental Impact Assessment Reports (EPA 2022)
- Environmental Impact Assessment Screening Practice Note 2021 (Office of the Planning Regulator)

Using the above documents, it has been possible to carry out an EIA Screening using the best available guidance while operating within the applicable legislation. It is noted that Directive 2014/52/EU has been transposed into Irish Legislation through the Planning and Development Act, 2000 (as amended), and the Planning and Development Regulations 2001 to 2023.

The methodology employed in this screening exercise is in accordance with the EIA Guidelines published in August 2018 by the DoHPLG and the contents of Schedule 7 and 7A of the Planning and Development Regulations.

EIA Thresholds

Schedule 5 of the Planning and Development Regulations 2001 to 2023 sets the thresholds for which if a project exceeds these limits, it then must be the subject of an Environmental Impact Assessment. Part 2 of Schedule 5 (10)(b)(i) identifies developments of more than 500 dwelling units, and (iv) identifies urban development which would involve an area of 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.

The number of bedspaces proposed in this instance is 217 (the equivalent of 55 residential units in line with the Sustainable Residential Development and Compact Guidelines) which is well below the 500-unit threshold, while the site area at c. 0.19ha is also below the 10ha threshold for urban development in other parts of a built up area that's not a business district. Given the above, a mandatory EIAR is not required.

Sub EIA Thresholds Projects requiring an EIA

The screening process has changed under the new Directive (EIA 2014/52/EU) which requires the applicant to provide certain information to allow the planning authority to carry out proper screening to determine if an Environmental Impact Assessment Report is required. Schedule 7A of the Planning and Development Regulations outlines the information to be provided by the applicant or developer for the purposes of screening sub-threshold development for Environmental Impact Assessment as set out below:

1. **A description of the proposed development, including in particular:**
    - A description of the physical characteristics of the whole project and, where relevant, of demolition works, and
    - 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:**
    - The expected residues and emissions and the production of waste, where relevant, and
    - The use of natural resources, in particular soil, land, water and biodiversity.
4. **Compilation of the above information at paragraphs 1 to 3 shall take into account, where relevant, the criteria in schedule 7.**

Schedule 7, as referenced in Item 4 of Schedule 7A, provides a further list of criteria for determining whether development listed in part 2 of schedule 5 should be subject to an environmental impact assessment. These can be grouped under broad headings and topics as set out below:

1. **Characteristics of the Proposed Development**;
    a. The size and design of the whole of the proposed development
    b. The cumulation with other existing development and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(*b*) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment,
    c. The nature of any associated demolition works;
    d. The use of natural resources, in particular land, soil, water and biodiversity;
    e. The production of waste;
    f. Pollution and nuisances;
    g. 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; and
    h. The risks to human health (for example due to water contamination or air pollution).

2. **Location of the Proposed Development**;

    The environmental sensitivity of geographical areas likely to be affected by proposed development, with particular regard to:
    a. The existing and approved land use;
    b. The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;

c. The absorption capacity of the natural environment:
    i. Wetlands, riparian areas, river mouth;
    ii. Coastal zones and the marine environment;
    iii. Mountain and forest areas;
    iv. Nature reserves and parks;
    v. Areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive; and
    vi. Areas in which there has already been a failure to meet the environmental quality standards, laid down in legislation of the European Union and relevant to the project, or in which it is considered that there is such a failure;
    vii. Densely populated areas;
    viii. Landscapes and sites of historical, cultural or archaeological significance.

3. Type and Characteristics of the Potential Impacts

The likely significant effects on the environment of proposed development in relation to criteria set out under paragraphs 1 and 2, with regard to the impact of the project on the factors specified in paragraph (b)(i)(I) to (V) of the definition of "environmental impact assessment report" in section 171A of the Act, taking into account:

a. The magnitude and spatial extent of the impact (for example the geographical area and size of the population likely to be affected);
b. The nature of the impact;
c. The trans-boundary nature of the impact;
d. The intensity and complexity of the impact;
e. The probability of the impact;
f. The expected onset, duration, frequency and reversibility of the impact;
g. The cumulation of the impact with the impact of other existing and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(*b*) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment, and
h. The possibility of effectively reducing the impact.

EIA SCREENING STATEMENT

The following sections provide the information as required by Schedule 7A for the purposes of screening sub-threshold development for EIA.

A DESCRIPTION OF THE PROPOSED DEVELOPMENT

Physical Characteristics of the Proposed Development

The proposed development will consist of a Large-Scale Residential Development delivering 217 student bed spaces (209no. single rooms and 4no. twin rooms, 213no. rooms in total), within one block. The block ranges in height up to 6 storeys with a basement below. All associated internal and external amenity space, including the provision of restaurant/café, on street carparking, cycle parking, landscaping, bin stores, service provision and all other associated site development works.

Adjoining properties along Blackpitts are similarly 2-3 storeys in height with apartment blocks to the east along Clanbrassil Street rising to 4-5 storeys. A traditional 2 storey residential area to the west comprising Greenville Parade, St. John's Street and Hammond Street is also set back from Blackpitts. Further north towards Newmarket Square building height increases within a number of recent developments including The Tannery and New Mill student residences and Aloft Hotel extending up to 8 storeys.

Blackpitts is a mixed-use area with apartments and own door housing sitting alongside commercial/office uses and educational uses. At 25-26 Blackpitts to the north is also the Blackpitts Mosque within a 2-storey building but with planning permission recently granted for a mixed use redevelopment comprising a new mosque and apartments at upper levels up to 7 storeys.

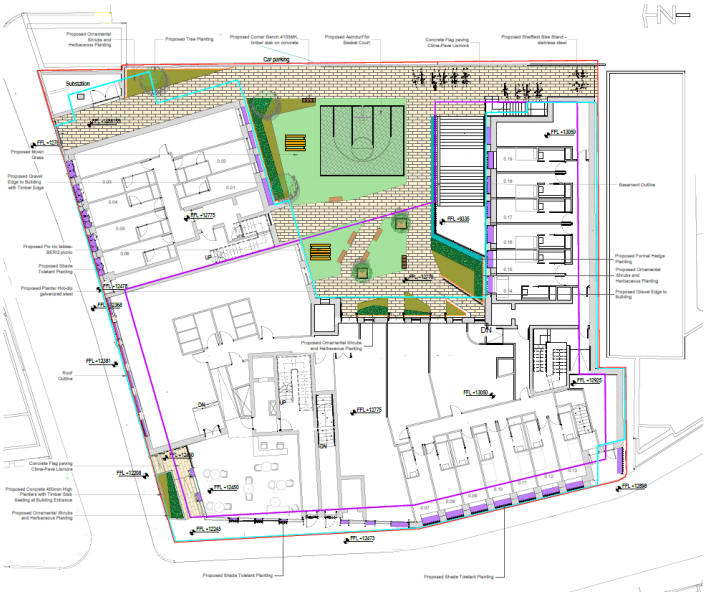

Figure 1: Site Layout Plan

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In terms of the environmental sensitivity of the site the following reports, which accompany the pre-planning application, are specifically noted:

- Architectural Design Report (Horan Rainsford Architects, 2025)
  - This sets out the proposed works in detail.
- Planning Report (McGill Planning, 2025)
  - This report provides detail on the planning rationale, the compliance with existing planning policy and guidance.
- CGI and Verified Views (Horan Rainsford Architects, 2025)
  - The photomontages provide a visual representation of the proposed development, showing the existing and proposed context for the development.
- Townscape and Visual Impact Assessment (TVIA) (ModelWorks, 2025)
  - This TVIA is a detailed report to identify and assess the significance of and the effects of change resulting from development on both the landscape as an environmental resource in its own right and on people's views and visual amenity.
- Daylight Sunlight Assessment (ModelWorks, 2025)
  - This provides a detailed assessment of the likely impact of the proposed development in terms of Daylight and Sunlight for the proposed development and the existing neighbouring properties.
- Traffic and Transport Assessment (AtkinsRéalis Consulting, 2025)
  - This report provides an assessment of the impact the proposed development will have on traffic and transport in the area.
- Flood Risk Assessment (JBA Consulting Engineers and Scientists Limited, 2025)
  - This report provides a detailed assessment of the likely flood risk associated with the Development.
- AA Screening (Altemar, 2025)
  - This report provides an assessment of the impact of the development on the wider area.
- Architectural Heritage Impact Assessment (BILL HASTINGS)
  - This assessment sets out the impact the development will have on protected structures within the vicinity.
- Archaeological Assessment (Archaeology and Built Heritage Ltd., 2025)
  - This assessment sets out any potential archaeological heritage assets and their impact on a site.

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Location of the Proposed Development

The subject site is located west of Clanbrassil Street in the Blackpitts area of the southwest inner city. Blackpitts is a relatively wide street with footpaths on both sides and on-street parallel parking along the site boundary and also along Donovan Lane to the north.

Blackpitts is located within the Inner City next to the City Centre with St. Stephen's Green c.10 mins walk from the site. The site is within walking distance of a range of public transport options and social infrastructure. The site itself contains 3 commercial properties within a single, 2 storey block, well set back from the street and with surface parking and service areas. The boundary treatment along Blackpitts and Donovan Lane comprises low rubble wall with metal railings.

Adjoining properties along Blackpitts are similarly 2-3 storeys in height with apartment blocks to the east along Clanbrassil Street rising to 4-5 storeys. A traditional 2 storey residential area to the west comprising Greenville Parade, St. John's Street and Hammond Street is also set back from Blackpitts. Further north towards

Newmarket Square building height increases within a number of recent developments including The Tannery and New Mill student residences and Aloft Hotel extending up to 8 storeys.

Blackpitts is a mixed-use area with apartments and own door housing sitting alongside commercial/office uses and educational uses. At 25-26 Blackpitts to the north is also the Blackpitts Mosque within a 2-storey building but with planning permission recently granted for a mixed use redevelopment comprising a new mosque and apartments at upper levels up to 7 storeys.

In terms of topography the site is generally quite flat, resting at similar levels to adjoining property and streets. Given that this subject site is an archetypal brownfield site, comprising existing commercial unit and hardstanding, the site in its current form lacks any green infrastructure of significance.
There are no protected structures on site or within the vicinity. The site is not located within an Architectural Conservation Area (ACA) nor is it subject to any protected views or prospects. The site however, is just within the Zone of Archaeological Constraint for the Recorded Monument DU018-020 (Dublin City) which is listed on the Record of Monuments and Places (RMP).

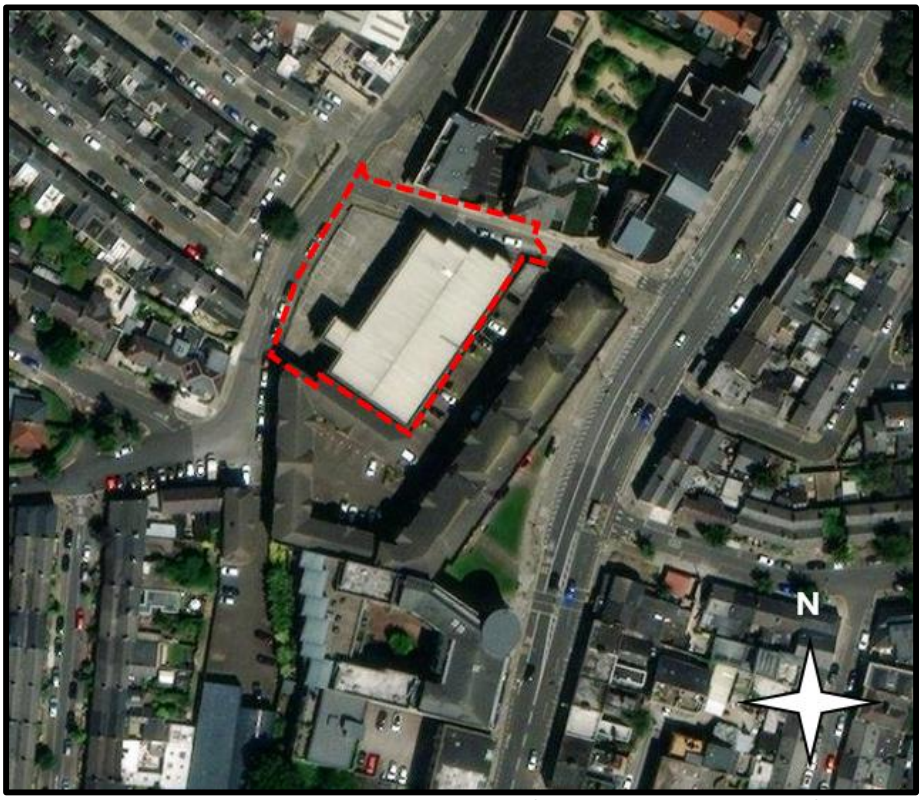

Figure 2: Approximate Site Location. Please note the red line is shown for indicative purposes only. Please refer to the architect's drawings for an accurate red line boundary

Planning History

McGill Planning have carried out a review of the planning history of the site. Dublin City Council planning files indicated that permission was originally granted in 1991 (DCC Ref. 1350/91) to develop a "cash and carry enterprise centre" on the site. In 2005 permission was granted to change the use of one of the units to offices (Ref. 2904/05). In 2015 permission was also granted for "upgrading and improvement works at the existing enterprise centre, consisting of reinstatement of four original windows to the rear first floor elevation, internal alterations and refurbishment" (Ref. 3682/15).

In the wider Blackpitts/Newmarket and wider Dublin 8 area there have been a number of significant, high-density developments permitted in recent years on brownfield sites for a variety of uses, including apartments (Build to Rent and Build to Sell), student accommodation and hotels, with a number of these built or under construction.

Subject Site

Previously approved planning applications on site are listed below:

DCC Reg. Ref:	1350/91
Decision:	Granted Permission subject to 10 conditions
Description:	Permission granted on 22nd October 1991 for a Cash and Carry Enterprise Centre on part of former McHenry Site.

DCC Reg. Ref:	2179/99
Decision:	Granted Permission subject to 3 conditions
Description:	Permission was granted on 22 March 2000 to erect a mansard type roof to existing building to form offices in new roof space.

DCC Reg. Ref:	2904/05
Decision:	Granted Permission subject to 4 conditions
Description:	Permission was granted on 16 August 2005 for the change of use of retail warehouse to office use including alterations to existing ground floor external facade and internal remodelling at Unit 3, Enterprise House, Blackpitts, Dublin 8.

DCC Reg. Ref:	3682/15
Decision:	Granted Permission subject to 7 conditions
Description:	Permission was granted on 16 February 2016 for upgrade and improvement works at existing enterprise centre (approved under Reg Ref. 1359/91) consisting of reinstatement of 4 no. original windows to rear 1st floor elevation, internal alteration and overall refurbishment of existing enterprise centre.

Adjacent Sites

The former Scholars Bar along Donovan Lane for the change of use of an existing bar/restaurant to residential apartments. At the time of writing these works appear fully completed. Other nearby development of note is the a mixed used development at 25-26 Blackpitts for the construction of a Mosque and 27no residential apartments.

DCC Reg. Ref:	2025/18
Decision:	Granted Permission subject to 12 conditions
Address:	Former Scholars Bar, Donovan Lane, Dublin 8

Description:	Permission was granted on 27th July 2018 for construction of a terrace of 3 no. three storey townhouses to the front (west) of the former Scholar's Bar, associated alterations to the parking area of the previous application Reg. Ref. 4142/16 for the change of use of the former Scholar's Bar into 4 no. apartments, proposed vehicular access will be from Donovan Lane, total car parking quantity for the existing granted 4 no. apartments and the proposed 3 no. townhouses will be 7 no. (one each per unit), all to existing two storey building at the former Scholar's Bar, Donovan Lane, Dublin 8.

DCC Reg. Ref:	4142/16
Decision:	Granted Permission subject to 7 conditions
Address:	Former Scholars Bar, Donovan Lane, Dublin 8
Description:	Permission was granted on 28 September 2016 for refurbishment and change of use of existing two storey bar/restaurant into apartments within the existing building. The height and windows will largely remain unchanged with some additions. The building will accommodate three number 3 bedroom apartments and one number 2 bedroom apartment with 3 roof terraces and 3 gardens facing south/east and a communal open space to the north/west. Permission is sought to demolish a front extension porch to the west elevation, and fro partial demolition of a rear extension to the east to form new gardens. It is proposed to lower a block on the south/east corner to form a floor terrace and extend and continue the roof profile to access the same roof terrace. It is proposed to add an escape stairs from this upper roof terrace to the lower roof terrace. Permission is sought for the construction of an escape stairs to the south east from the lower roof terrace to an escape lane t the rear of the site. Permission is sought to construct a dormer to the north/east and for raised parapet walls to the roof terrace at same location. Permission is sought of 6 new skylights to the roof. Permission sought for two new opens to the west elevation. Vehicular access will be via the existing entrance to the former Scholar's Bar, Blackpitts. Parking is provided on site for up to 7 cars. Pedestrian access will be retained form Donovan Lane to the site via a gate on the Southern boundary. Total number of apartments is 4.

DCC Reg. Ref:	3454/14
Decision:	Split Decision (Permission & Refusal)
Address:	Former Scholars Bar, Donovan Lane, Dublin 8
Description:	A split Decision was issue on 05 May 2015 for the conversion of the existing 2 storey Bar into 3 storey within the existing building with the overall height to remain as is and to accommodate 4no. 2 bedroom apartments at ground, first and second floors together with balconies facing South / East with a glass link bridge at first floor to link into new proposed 3 storey building to the North West of the site with roof garden, cafe/bar/restaurant at ground floor and 1 no. 3 bed apartment at first and second floor with 1no 2 bed apartment at third floor together with roof garden and lift, with Balconies facing South / East and North / West all with onsite bin storage, cycle racks, communal open space, signage and associated site development works, total number of apartments 7. The apartment block was omitted from the development.

DCC Reg. Ref:	2654/20
Decision:	Granted Permission subject to 17 conditions
Address:	25-26, Blackpitts, Dublin 8
Description:	Permission for a mix development consisting of demolition of the existing 2-storey warehouse type structure that is currently in permitted use as a religious, cultural and community building; construction of a mixed-use development in a building ranging from 3 to7 storeys over basement level; Mosque located at ground floor and mezzanine level; 27 no. residential apartment units with balconies located on first to sixth floor consisting of 6 no 1-bed units 20 no.2-bed units; 1 no. 3 bed unit. The development will include cycle parking, plant rooms and storage areas for apartment and mosque at basement level, bin store at ground floor level and all associated development works, signage, landscaping, boundary treatments and services.

A DESCRIPTION OF THE ASPECT OF THE ENVIRONMENT LIKELY TO BE SIGNIFICANTLY AFFECTED BY THE PROPOSED DEVELOPMENT

This section provides examines the possible effects on the environment under the topics prescribed by Directive 2014/52/EU. This approach provides a comprehensive description of the aspects likely to be affected by the proposed development that have not been identified.

This site is within an established, built-up inner city urban location. It is considered that the proposed development is likely to result in a long-term positive effect, in terms of providing for a comprehensive and integrated residential development on this brownfield site. The impact of this proposed development is set out in the full application documents including landscaping, architecture, environmental, and engineering.

Population & Human Health

The application site is bounded to the north by Donovan Lane with residential units (St Kevin's Place), to the west is Blackpitts with residential development along the opposite site of the road (Greenville Parade), residential apartments to the south (Greenville Place) and a 4no. storey residential apartment block to east of the development (Greenville Place).

During the construction phase there may be possible short-term nuisances to human beings from noise and dust during construction. Once mitigated in accordance with an agreed Construction Management Plan it is not anticipated that the construction works would result in significant environmental impacts for the local population and human health. Please refer to documentation prepared by JJ Campbell & Associates Civil and Structural Engineers. A detailed CWMP will be submitted as part of any forthcoming grant of permission and submitted for approval to the local authority prior to commencement of works by the main contractor.

There are no operational impacts associated with this residential development that would be likely to cause significant effects in terms of population and human health. The additional residential created will have a positive impact on the area and will help sustain existing services and public transport and provide demand for additional. The provision of communal open space and residential amenity provisions enhances an underutilised brownfield site in an urban area which will improve the experience of the area for future residents.

The proposed development will provide a positive visual improvement to the character and streetscape of the area and will not detrimentally impact existing residential amenity in terms of light and daylight.

Biodiversity

The site is brownfield and located within a built-up inner city urban location. There is no original, natural ecology within application site which is predominantly in hardstanding or buildings. Some ornamental plantings exist within the site, currently in an unmaintained and overgrown condition.

Appropriate Assessment

An Appropriate Assessment Screening Report prepared by Altemar Environmental accompanies this preapplication consultation. The report concluded that;

"It is considered that in combination effects with other existing and proposed developments in proximity to the application area would be unlikely, neutral, not significant and localised. It is concluded that no significant effects on Natura 2000 sites are likely as a result of the proposed development in combination with other projects. No in combination effects are foreseen. ***No projects in the vicinity of the proposed development would be seen to have a significant in combination effect on Natura 2000 sites."***

Having taken into consideration foul and surface water drainage from the proposed development, the distance between the proposed development to designated conservation sites, lack of direct hydrological pathway or biodiversity corridor link to conservation sites, and the dilution effect with other effluent and surface runoff, it is concluded that the proposed development would not give rise to any significant effects to designated sites.

The construction and operation of the proposed development will not impact on the conservation objectives of qualifying interests of European sites."

Bat Fauna Impact Assessment

To accommodate the proposed development, the demolition of the existing building in-situ is required. As such, a bat survey was commissioned and carried out by Altemar Environmental which accompanies this pre-application.

The surveys found;

"No confirmed bat roosts will be lost. No trees of bat roosting potential are noted on site. The site is brightly lit by street lighting. The proposed development will change the local environment as new structures are to be erected. No bat activity was noted on site. No bat roosts or potential bat roosts will be lost due to this development. The potential for collision risk and impact on flight paths in relation to bats is considered low due to the low level of bat activity on site and the buildings would be deemed to be clearly visible to bats. The proposed development will have a neutral long-term impact on bat populations."

Lands and Soils

The site is brownfield in nature, primary consisting of building and hardstanding. The topography of the site is generally quite flat. While there are proposed alterations to the levels across the site to facilitate the underground infrastructure provision, the construction or operation of the scheme would not use such a quantity of soils to result in significant effects on the environment.

Water

In relation to water supply, it is proposed to upgrade the existing connection to a new 150Ø connection from the existing 150Ø DI public mains in Blackpitts.

Water metering will be in accordance with the requirements of Irish Water. Pressure boosting and storage will be to the requirements of Dublin City Council/Irish Water. Design Details for pressure boosting and storage will be agreed with Dublin City Council Water Services Division/Irish Water prior to development commencing on site.

Foul water from the proposed development will all drain by gravity and will be designed to take discharges from the student accommodation LRD. Foul in the basement will be pumped from the basement up to a decompression manhole FMH02 before discharging by gravity to FMH01. The foul system will connect to the existing 300Ø combined sewer southeast of the proposed development at the corner of Blackpitts and Donovan Lane into existing manhole SO14329906. Discharge rates shall be calculated using Irish Water Code of Practice.

A Pre-connection enquiry was submitted to Irish Water to confirm capacity in the receiving network. A confirmation of feasibility was received from Irish Water confirming the existing Watermain and Foul/combined network has capacity for the proposed development.

Surface water runoff from the proposed development will all drain by gravity and will be attenuated prior to discharge into the existing 300Ø combined sewer on Donovan Lane. Peak surface water runoff will be restricted to 2 litres per second for the whole development.

DCC drainage construction standards will be applied to all external spaces which are to be taken in charge by DCC in accordance with the Greater Dublin Regional Code of Practice.

The proposed development has been assessed in relation to Sustainable Urban Drainage Systems (SuDS) and designed in accordance with DCC Development Plan and the UK SUDS Manual. The proposed development shall incorporate a number of different SuDS components adapted to the local context ensuring that runoff is manged at source:

- The top most roof and lower terraces shall be a minimum of 70% Green and 100% Blue roofs, intercepting / treating the first 5mm of rainfall and also attenuating storm water.
- All paving in the central courtyard shall be permeable paving, intercepting /treating the first 5mm of rainfall. Even if the soil has poor infiltration some infiltration will take place in the stone below the areas and the overflow pipe will retain flow which will slowly infiltrate or evaporate.
- Soft landscaping shall allow interception / treatment. Soft landscaping shall also incorporate tree pits which provide long term SuDS benefits such as attenuating surface water and filtering out pollutants.
- 3 No SuDS tree pits are proposed for the development.

The Engineering Services Report prepared JJ Campbell & Associates Civil and Structural Engineers provides further detail on the proposed surface water, foul water, and water supply for the site.

The Flood Risk assessment prepared by JBA Consulting Engineers and Scientists Limited found there are no historical records indicating any flood events at the subject site in recent times. The River Poddle is a culverted watercourse that runs adjacent to the western boundary of the proposed development. Based on review of the CFRAM flood maps, the site is classified within Flood Zone C, indicating a low risk of both fluvial and coastal

flooding based on available flood mapping data, and is therefore excluded from further flood risk assessment at this stage.

Air and Climate

Generally, the primary potential air quality impact or nuisance associated with construction activities is dust. Excavations and earth moving operations may generate quantities of construction dust, particularly in drier weather conditions. The extent of any construction dust generation depends on the nature of the construction dust (soils, sands, gravels, silts etc.) and the construction activity. The potential for construction dust dispersion depends on the local meteorological conditions such as rainfall, wind speed and wind direction. The main potential sources of air borne dust from construction activities include Construction vehicles, construction traffic and haulage routes; Excavation works and earth-moving activities; Materials (particularly excavated soils) handling, storage and stockpiling.

There are no likely significant effects on air quality arising from the proposed development, except for the potential temporary effect arising from dust during the construction phase. The effects on human health arising from the construction phase of the proposed development is considered to be imperceptible in this regard. Standard environmental control measures will be employed in agreed Construction Management Plan.

The proposed development is not likely to have a significant effect on Air and Climate during the operational phase.

Noise and Vibration

Construction noise, while inherently noisy and disruptive, is temporary in duration. The works involving heavy machinery for the purposes of excavation, the preparation of building foundations and passing construction traffic usually cause the most disturbances to nearby residents. Noise control measures would be implemented by the construction works contractor for the duration of the construction of the proposed development.

The Construction Management Plan prepared and submitted includes environmental control measures to manage the noise impact on the surrounding residential area where possible.

There are no likely noise emissions arising from the residential development at this site other than those associated with the operation of the site as a residential development including operational traffic associated with the development.

Landscape & Visual

It is submitted that the overall development will have a positive impact on the landscape features of the site and the character of the area.
The development would unquestionably alter the character of Donovan Lane and the southern stretch of Blackpitts, and *views from* the residential area to the west (while the character of the residential area itself would be unchanged) - but the nature and extent of the change would be consistent with the trend already established in this part of the city.

The pertinent question is whether the change would be positive, neutral or negative. The assessment of visual impacts found that the development would have positive effects. An unsightly warehouse building would be replaced by an attractive and visually interesting residential building, enhancing the quality of the built environment. While the building is considerably larger than the neighbouring buildings, design measures have been taken to reduce the perception of scale (setback of the upper floors, highly articulated facades, variations

in material, etc.). Larger buildings positioned alongside or close to smaller buildings do not necessarily result in negative visual impact. There are numerous examples in the city – including in the vicinity of the site– of larger and smaller scale development coexisting *to the benefit of the townscape*.

This would be the case with the proposed development. **The existing variation in character that occurs east to west across Blackpitts would be strengthened; the townscape east of Blackpitts would be directly enhanced, and the area to the west would be indirectly enhanced.**

In conclusion, the proposed development can be considered an appropriate intervention in the townscape. No negative townscape or visual impacts have been identified.

Traffic

The Traffic and Transport Assessment, prepared by AtkinsRéalis Consulting Engineers, has considered the traffic and transportation implications of the proposed development. It demonstrates that the development can be readily accessed by existing and future sustainable modes of transport within the immediate vicinity of the site.

The proposal provides 272 no. secure bicycle parking spaces for residents, staff and visitors at ground floor and basement level, this is considered appropriate given the central and accessible location of the site. No car parking provision is proposed.

Commented [SM4]: TBC

As set out in the AtkinsRéalis Consulting Engineering Report, this is considered acceptable due to nature of student accommodation, the site's inner city location coupled with its proximity to City Centre, and the site's proximity to high frequency public transport.

The proposed development is not anticipated to have a detrimental impact on the local road network in terms of congestion and road safety.

Material Assets

The land on which the site is situated is a material asset. The site is zoned Z1 *'Sustainable Residential Neighbourhoods'* and can accommodate student accommodation through the appropriate process. The use of this material asset in a manner compatible with the zoning designation, is entirely appropriate. Once constructed, the operational phase will provide an important material asset for the area in terms of residential units for neighbouring educational facilities.

Other material assets in terms of water services, electricity, and other utilities are all available in this residential area and the proposed development to readily connect to same. There are no strategic utilities running through the site which would be impacted by the proposed development.

Archaeology, Architecture and Cultural Heritage

Commented [SM5]: Make reference to Bill Hastings

The site does not contain any structures or features above ground. There are no protected structures on the site. The site is also located outside of the Zones of Archaeological Interest identified on the Dublin City Council Development Plan.

The Archaeological Assessment prepared by John Purcell notes the following:

"This assessment has examined the trajectory of historical settlement on the development site, where there is little likelihood that modern development has substantially truncated into underlying strata. The likelihood of there surviving archaeological deposits of significance at this location is nonetheless considered slim.

It is nonetheless recommended that the substrates under the existing slab be inspected as the ground is being broken out and that the footprints of the structures fronting Donovan's Lane are recorded under licence as an archaeological exercise.

It is also recommended that given the proximity of the Poddle, that the area to the front of the existing structure be test excavated to investigate for economic activity on the riverside which may predate the creation of the Abbey Stream."

Vulnerability of the project to risks of major accidents and/ or disasters

The Flood Risk Assessment identifies that the site is within Flood Zone C, with a low probability of flooding.

The proposed development is not considered vulnerable to major accidents and/ or disasters, and therefore the expected effects are considered to be negligible.

Inter-relationship between the above factors

It is considered that any of the previously identified relatively minor temporary effects are not in themselves considered significant nor will they cumulatively result in a likely significant effect on the environment.

A DESCRIPTION OF ANY SIGNIFICANT EFFECTS TO THE EXTENT OF THE INFORMATION AVAILABLE ON SUCH EFFECTS OF THE PROPOSED DEVELOPMENT ON THE ENVIRONMENT

This includes information available on the environment including:

(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.

The proposed development is on a brownfield vacant site in a central location and within an existing serviced urban area. The proposed works are residential in nature and will require the construction of one block of student accommodation using regular building materials. Given the nature of the site and the Proposed Development they will be no likely significant effects on land, water or biodiversity.

It is expected that there will be some residues/emissions created during the construction stage associated with the development works proposed which include ground preparation works, development of site infrastructure, construction of buildings and hardstanding areas and landscaping of the site including open soft landscaped areas.

Standard mitigation measures will be employed and monitored. These measures will be set out in an agreed Construction Management Plan. As such residues and emissions are not considered likely to have potential to cause significant effects on the environment.

There will be some waste materials produced in the construction of the proposed scheme which will be disposed of using licensed waste disposal facilities and contractors. As is standard practice the scale of the waste production in conjunction with the use of licensed waste disposal facilities and contractors will not cause concern for likely significant effects on the environment.

An Operational Waste Management Plan (OWMP) will accompany the full application, which will set out measures ensuring the maximise quantity of waste is recycled throughout the proposed residential development. The scheme will provide sufficient waste recycling infrastructure, waste reduction initiatives and waste collection and waste management information to the residents of the development.

There will be no large-scale use of natural resources. The main use of natural resources will be land. The subject lands are brownfield lands which are zoned *'to protect, provide and improve residential amenities.'*

Other resources used will be construction materials which will be typical raw materials used in construction of residential developments. The scale and quantity of the materials used will not be such that would cause concern in relation to significant effects on the environment.

The construction or operation of the scheme would not use such a quantity of water to cause concern in relation to significant effects on the environment. The use of natural resources in relation to the proposed development is not likely to cause significant effects on the environment.

COMPILATION OF THE ABOVE INFORMATION TAKING SCHEDULE 7 CRITERIA, AS APPROPRIATE, INTO ACCOUNT

The compilation of the above information and assessing the development against the Schedule 7 criteria:

Characteristics of Proposed Development	
The size of the proposed development.	The site is c. 0.19ha and the development is for 217 student bedspaces. The development is sub-threshold for EIA.
The cumulation with other existing development and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(*b*) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment.	The impact of the development in cumulation with existing developments adjacent the site has been fully considered within the plans and particulars of the planning application. There are existing residential developments to the east, north and south of the site and these have been considered, where appropriate, within the plans and particulars including architectural drawings, visual assessment and amenity assessments. We note the relatively recent works to Former Scholars Bar, Donovan Lane, located just north of the site. However, all of these are not largescale developments and as such it is considered that the Proposed Development does not give rise to cumulation with other development for the purposes of Section 172(1A)(b) of the Planning and Development Act 2000, as amended.

	Other nearby development of note is a mixed used development at 25-26 Blackpitts for the construction of a Mosque and 27no residential apartments. In the wider Blackpitts/Newmarket and wider Dublin 8 area there have been a number of, high-density developments permitted in recent years on brownfield sites for a variety of uses, including apartments (Build to Rent and Build to Sell), student accommodation and hotels, with a number of these built or under construction. There are no extant permissions for significant redevelopment (subject to EIAR) directly adjacent the site to be cumulatively assessed but regard is had above to permitted development in the wider Blackpitts Road in particular in relation to cumulative visual impact and traffic impact.
The nature of any associated demolition works.	All of the existing building on site will be demolished as part of the proposed development. This industrial building is detailed in the architectural drawings submitted and their demolition has been fully considered in various assessment reports including the Construction Management Plan and Demolition Justification report.
The use of natural resources, in particular land, soil, water and biodiversity.	The main use of natural resources from this development will be the use of land. The subject site is currently brownfield with significant hardstanding and minimal natural vegetation and no existing habitats on site which is zoned for sustainable residential neighbourhood uses which accommodates student accommodation. The proposed development is located on an enclosed site in the urban environment of Dublin City. Both surface and foul water discharge from the site will ultimately connect to the existing combined sewer on Donovon Lane. High quality landscaping, planting and SuDS measures will be incorporated into the development to ease water runoff. No use of natural resources other than the normal use of building materials is proposed.
The production of waste.	Construction waste produced will be controlled, stored and disposed of in a sustainable manner as per relevant environmental guidance. Operational waste for the residential and commercial development will be controlled by each household/business and dealt with by municipal services. The LRD planning application is accompanied with an Operational Waste Management Plan.
Pollution and nuisances.	The construction phase will create short term negative effects particularly in terms of dust and noise.

	The implementation of the Construction Management Plan will ensure that construction activities are properly controlled and mitigated.
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	Standard construction practices will be employed throughout the construction phase to mitigate the potential of any major accidents or disasters from occurring. The proposed location of development is not considered particularly vulnerable to major accidents and/or disasters and therefore the expected effects are considered to be minimal.
The risks to human health (for example, due to water contamination or air pollution).	There are likely effects at construction stage in terms of noise, dust and contaminated run-off. However, these will be temporary and will be mitigated in accordance with the Construction Management Plan.
Location of Proposed Development	
The existing and approved land use.	The site is currently brownfield. It is zoned Z1 'Sustainable Residential Neighbourhoods', student accommodation can be accommodated under this use.
The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground.	This is an allocated urban site that will be developed for student accommodation appropriate to its location. The provision of open spaces (communal) will be positive for the area. The use of SuDs measures on site is an additional benefit.
The absorption capacity of the natural environment, paying particular attention to the following areas: (i) wetlands, riparian areas, river mouths; (ii) coastal zones and the marine environment; (iii) mountain and forest areas; (iv) nature reserves and parks; (v) areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive and; (vi) areas in which there has already been a failure to meet the environmental quality standards laid down in legislation of the European Union and relevant to the project, or in which it is considered that there is such a failure; (vii) densely populated areas; (viii) landscapes and sites of historical, cultural or archaeological significance.	(i) The site itself is not located within a wetland, river mouth, coastal zone, marine environment, mountain, forest, nature reserve, park, or protected site. The nearest waterbody to the subject site is the River Poddle, located approximately 30m west of the site boundary. (ii) The subject site is not located in a coastal zone or marine environment. (iii) The subject site is not located within a mountain or forest area. (iv) The subject site is not located within a nature reserve or park. (v) The subject site is not located within a European Site or a Natura 2000 classified or protected area. the nearest European site to the proposed development is c4kmm away (South Dublin Bay SAC). The AA Screening concluded that *"In the absence of mitigation, no significant effects on European sites are likely. No specific mitigation is required to prevent impacts on European sites."* (vi) The subject site is not located within an area in which there has already been a failure to meet environmental standards. (vii) The surrounding area is a densely population urban environment.

	(viii) The site does not contain any protected structures or features above ground. The site lies within the zone of archaeological potential for the historic city (DU018-020), although there are no discrete recorded monuments within the red line boundary. The Archaeological Assessment prepared by Archaeology and Built Heritage Ltd notes the following: *"This assessment has examined the trajectory of historical settlement on the development site, where there is little likelihood that modern development has substantially truncated into underlying strata. The likelihood of there surviving archaeological deposits of significance at this location is nonetheless considered slim."*
Types and characteristics of potential impacts	
The magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected).	Given the existing context it is expected that the proposed development will not have any significant environmental impact beyond the site and immediate vicinity. All construction activities will be governed by a Construction Waste Management Plan the details of which will be agreed with Dublin City Council prior to commencement of development.
The nature of the impact.	The potential likely and significant impacts arising from the development will be typically those associated with a medium to high scale residential development in an area designated for growth. The nature of the impacts, other than visual, are expected to be of a magnitude that would not be significant, adverse or permanent. The impact of the student accommodation at operational stage will be typical of this sustainable residential neighbourhood area and will not be significant, adverse or permanent.
The transboundary nature of the impact.	Any minor impacts will be contained in the immediate vicinity of the site. The subject lands are not located on any geographical or other boundary of relevance to assessment of likely significant effects on the environment.
The intensity and complexity of the impact.	The proposed development is not of any significant intensity or complexity such that would be likely to cause significant effects on the environment.
The probability of the impact.	It is probable that the minor impact of noise and pollution during the construction phase will occur; however, construction works on zoned lands within the area are not unexpected or out of character, and working hours will be limited to hours set by the planning conditions.
The expected onset, duration, frequency and reversibility of the impact.	The minor impacts identified would occur during the construction phase only. The frequency of impacts will vary

	throughout the construction phase; however, the impact is still considered to be insignificant as any potential impacts will be effectively managed, reduced or eliminated. The minor effects associated with the construction phase such as noise, dust and traffic will be temporary. There are no significant negative impacts which are considered likely to occur during the operational phase of the proposed residential development.
The cumulation of the impact with the impact of other existing and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(*b*) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment.	The scale of the proposed scheme is not such that the characteristic of any potential impacts, in combination with each other, are likely to cause significant effects on the environment.
The possibility of effectively reducing the impact.	Appropriate environmental control measures will be undertaken in order to ameliorate effects on the environment arising from the proposed development. Any control measures to manage noise, dust and/or pollution during the construction phase will be based on standard best practice, policies and guidance.

SUMMARY

The site is located on appropriately zoned lands and the proposed development is in accordance with the allowances of the zoning and associated local and national planning policy.

The proposed development includes for student accommodation with 217 bedspaces including communal open space and associated works. It is considered that the characteristics of the proposed development, its location and the type and characteristics of the potential impacts arising do not give rise to likely significant impacts. While temporary or short-term impacts in relation to construction noise and dust may arise, such impacts are typical of any construction phase, and any potential impacts on nearby receptors will be effectively managed through mitigation measures and standard best practice construction measures.

CONCLUSIONS

In conclusion, it is respectfully submitted that the proposed development is below the thresholds of a mandatory EIAR. The screening exercise has been completed in this report and the methodology used has been informed by the available guidance, legislation and directives.

It is considered that a sub threshold EIAR is not required for the proposed development as the proposal is below the thresholds of Schedule 5 of the Planning and Development Regulations; the proposal is unlikely to have effects on the Natura 2000 Network, either alone or in combination with other plans; the development will be connected to public services such as water and foul systems; standard construction practices can be

employed to mitigate any risk of noise, dust or pollution; and no identified impact in this screening exercise either individually or cumulatively will have significant impacts on the environment.

In conclusion, it is considered that the proposed development will not have any significant impacts on the environment. All recommended mitigation measures and standard practices will be employed throughout the construction and operation phase of the development to ensure that the proposed development will not create any significant impacts on the quality of the surrounding environment.