CONSTRUCTION MANAGEMENT PLAN

Firhouse Dublin

Review:

SUBMISSION	REV.	STATUS	PREPARED BY	CHECKED BY	DATE
01	01	For Issue	J. Nugent	L. Reel	21/10/2025

Contents

1.0 INTRODUCTION

1.1 BACKGROUND

This Construction & environmental management plan has been prepared by Townmore for the Firhouse project. This plan aims to detail all the measures and considerations to be put in place to mitigate, manage, or minimise the potential environmental impacts of the project.

The objectives of this Construction Management Plan (CMP) are to:

- Establish specific control measures to minimise the impact of construction works on the environment; and,
- To ensure that consistent standards of environmental protection are established and maintained throughout the project works.
-

Key stakeholders include (but may not be limited to);

- Townmore management
- Townmore direct labour
- Subcontractors
- Design team / consultants
- Local authority
- Neighbours
- End users

1.2 SITE TEAM

Client/Design Team/Consultant Roles

Client / Design team / Consultant roles					
Role	Company	Name	Project Role	E-Mail	Telephone
Client	Bluemont	Keith Screeney	Director	kscreeney@bluemontintl.com	
Client	Bluemont	Vincent Cronolly	Development manager	vcronolly@bluemontintl.com	
Arch	OMP	Michael Hussey	Director	mhussey@omp.ie	
Arch	OMP	Orla O' Kane	Project Architect	ookane@omp.ie	
Arch	OMP	Kevin O' Neill	Associate	koneill@omp.ie	
Civ/Str	BMCE	Stephen O' Connor	Director	soconnor@bmce.ie	
Civ/Str	BMCE	Darragh O' Rourke	Engineer	dorourke@bmce.ie	
M&E	NLC	James Long	Director	jameslong@lawlerconsulting.com	
M&E					
PSDP	OLM	Sinead Gaughan	Associate	s.gaughan@olmconsultancy.ie	
PSDP					
Landscape architect					
Landscape architect					
Archaeologist					

PSCS Construction Team

Construction Team					
Role	Company	Name	Project Role	E-Mail	Telephone
Main Contractor	Townmore	James Godley	Managing Director	jgodley@townmore.ie	087 617 4145
Main Contractor	Townmore	Liam Reel	Contract Manager	lreel@townmore.ie	0862305240
Main Contractor	Townmore	James Nugent	Project Manager	jnugent@townmore.ie	0871080221
Main Contractor	Townmore	Barry Guiry	Site Manager	bguiry@townmore.ie	0868164630
Main Contractor	Townmore	Joe Brady	Senior Engineer	jbrady@townmore.ie	0871167415
Main Contractor	Townmore	David Allen	H,S&E Manager	dallen@townmore.ie	0872230042
Subcontractors	TBC				

1.3 PROPOSED DEVELOPMENT DESCRIPTION

The site is situated in a busy area with high volumes of both pedestrian and vehicular traffic surround the site. The access is currently off the R114 Road Firhouse, County Dublin. There are residential properties near the site to the South and Northeast. The site is bound to the North and West by existing greenery.

The road infrastructure outside the site includes Traffic light-controlled junction which connects to the M50 nearby, among other routes. These are busy routes which connect a highly densely populated surrounding area. There are residential properties, a schools and business properties nearby.

The new development will consist of 83 number one-bed, two-bed and duplexes in 2no. blocks, including a crèche and commercial units together with parking, roadways and ancillary site works including works to the public road, landscaping and boundary treatments.

Site location within the Firhouse area.

Site location with red line

3D View – South East

1.4 OUTLINE OF PROPOSED WORKS

The construction work will be completed by demolishing the existing buildings on the site, excavating the Basement and building the 2no. Blocks from the Basement up.

Enabling works:
This section of works includes the following.

- Protection of the trees to be retained if required. This work will be carried out under the supervision of the arborist and in line with the tree protection plans if required. Barriers will be erected around each of the trees to be maintained and signage erected to warn others of their importance.
- Removal of remaining trees and scrub if required. These will be removed by a specialist tree removal company. Any trees / lumber will be chipped for reuse.
- Site setup. The site facilities, including welfare, offices, entry areas, laydown areas, temporary lighting and security will be installed at this stage.
- Diversion/disconnection of the existing utility services that are currently running under the proposed building footprint.

The siteworks comprise of 83 units and will consist of the site strip, basement excavation, drainage and utility works, façade, internal finishes and landscaping. These works will take approximately 24 months to complete.

Site services installation and the reduced level dig will produce excavated materials. The current borehole tests suggest that this material will be non-hazardous material. Soil due to be removed from site during these works will be sampled and WAC tested to determine the best course of action. Please see further details on the management and removal of the soil in the Waste Management plan. Any material that can be retained on site for use in landscaped areas will be stockpiled on site until required.

2.0 CONSTRUCTION MANAGEMENT PLAN

2.1 CONSTRUCTION PROGRAMME

Subject to an agreed start date with the Client, it is intended for the works to commence as soon as practical. The construction of phase is programmed to be completed in 24 months.

2.2 VEHICULAR ACCESS TO SITE

It is proposed that construction traffic will access the site via R114 Road. This is a residential area and is a busy road withpublic vehicles and pedestrians.

Controlled points in terms of roundabouts will be used to ensure that all access and egress is undertaken in a safe controlled fashion.

A competent Gateman/banksman will be directing construction traffic.

Site access for all personnel, visitors and deliveries will be controlled via manned entry gates. A turnstile system will be in place at the pedestrian entrance that will prevent unauthorised access. The vehicle gate will be controlled by security guard / traffic marshal that will both direct traffic and prevent unauthorised access. All visitors will be directed to the site office to sign in and receive induction prior to entering the construction area.

Pedestrian and vehicle access and routes will be always separated by fencing and / or suitable barriers.

There is no parking permitted along the R114 Firhouse Road, adjacent of the access to the site or in surrounding residential areas.

The gateman will ensure all wheels of lorries are in good order prior to leaving site to ensure so that traffic leaving the site compound will not generate dust or cause the build-up of aggregates and fine material in the public domain.

2.3 PROTECTION OF PUBLIC AREAS FROM CONSTRUCTION ACTIVITY

Perimeter hoarding/heras fencing will be provided around the site to provide a barrier against unauthorised access from the public areas. Controlled access points to the site, in the form of gates or doors, will be kept locked for any time that these areas are not monitored (e.g., outside working hours).

The hoarding will be well-maintained and will contain graphics portraying project information. The hoarding is of particular importance along the boundaries with public road infrastructure to prevent access by the public.

All materials being lifted by crane will be controlled by guide ropes and will only be completed under the strict supervision of appropriately qualified and experienced banksmen.

Tower cranes will be fitted with restrictors to prevent them lifting materials over existing buildings.

2.4 SITE SECURITY

The site will be secured as described above. Hoarding will be designed by a competent temporary works engineer.

Access to site will be controlled by means of Gateman/Turnstile system and camera remote monitoring system for out of hours. During working hours, a gateman will control traffic movements and deliveries to ensure safe access and aggress to site.

All personnel working on site must have a valid Safe Pass card & manual Handling training and be inducted by Townmore with regard to site specific information.

An extensive CCTV system will be in place for the duration of the works. This system will be monitored remotely for any unauthorised access.

2.5 MATERIAL HOISTING & MOVEMENT THROUGHOUT THE SITE

It is envisaged that 1 No. Tower Crane will be erected on the project to assist with superstructure and façade works. In addition to the tower crane, separate mobile crane visits may be required from time to time. These visits will be coordinated with the other site activities and crane operations to ensure all risks are correctly assessed and mitigated against.

Material hoists and teleporters will also be utilised around the perimeter of the building within the site as required during the projects to facilitate material movement and waste movements out of the building. With the commencement of the fit-out activities material hoists strategically positioned will play a key role for successful project delivery. They are also less susceptible to being affected by

inclement weather conditions.

2.6 DELIVERIES & STORAGE FACILITIES

It is the intention that unloading bays are provided for deliveries to the site within the hoarding perimeter. Deliveries will be accessible by tower cranes and teleporters. Appropriately demarcated storage zones will be used to separate and segregate materials.

It is not envisaged that any requests for road closures will be required to prepare for deliveries or erection of cranes etc. The cranes and deliveries of any exceptional loads should be accommodated within the boundaries of the site.

All deliveries will be taken directly into the site and unloaded from one of the roads / laydown areas. Materials will be unloaded using the telehandler and / or tower cranes and placed on the relevant floor or area of the project ASAP. Large bulk items will not be stored on the project for extended periods.

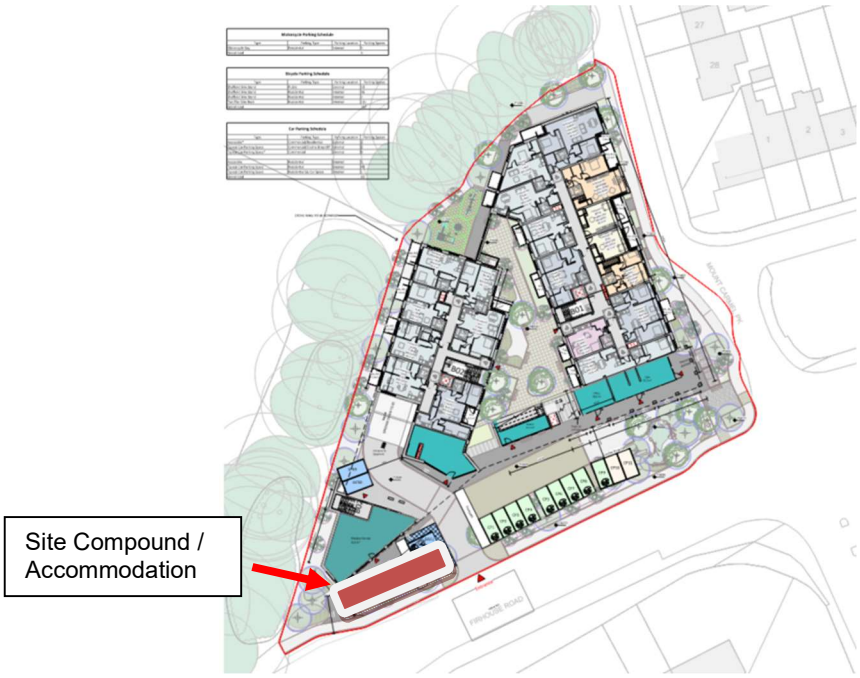
All lifting equipment and appliances will carry current test certificates and be inspected prior to use. Trained banksmen will always attend the cranes

2.7 SITE ACCOMODATION

On site accommodation, will consist of; -

- Adequate materials drop-off and storage area.
- Staff welfare facilities i.e., toilets, site offices, Canteen, Drying rooms etc.
- A temporary electricity supply will be provided to the site via an existing connection in one of th existing buildings that will be demolished.

Water supply to the site will be provided by means of an existing connection to the public water main. Similarly, a temporary connection for foul water drainage will be made to the public network on agreement with the Local Authority. It may be possible to utilise branch connections already in place on the existing site to minimise/prevent disruption to the public space outside of the site boundary when making these temporary connections.



2.8 SITE PARKING

There will be no parking available directly on site. However, parking will be available in the adjacent GAA pitch car park for construction staff.

2.9 SITE WORKING HOURS

Compliance with normal construction working hours of 07:00-19:00 Monday to Friday, 08:00-14:00 on Saturdays, with no working on Sundays or bank holidays. If the Planning Conditions differ from this, they will be adhered to.

Any allowance for nighttime working or out of hours working must be agreed on a case-by-case basis with South Dublin County Council.

3.0 ENVIRONMENTAL ISSUES

3.1 NOISE

All construction activities will be carried out in compliance with the recommendations of BS 5228, Noise Control on Construction and open sites, part 1.

These measures employed to ensure compliance will include -

- The best means practical will be used to minimize the noise produced by all on site operations.
- Proper maintenance of all operating plant to ensure noise emission compliance.
- All operating plant will be selected on the bases of incorporating noise reducing systems, and at a minimum be fitted with effective exhaust silencers.
- Compressors will be fitted with acoustically lined covers, which will remain closed while the machines are in operation.
- Plant such as pumps and generators which are required to work outside of normal working hours will be enclosed with acoustic enclosures.
- There will be strict adherence to the site working hours stipulated in the Planning Conditions.

Assessment of Noise Effects
The dB levels at each station will be taken as a base line prior to construction. Regular readings will also be taken to establish a record of noise levels over a given period.

Action level = >80dB(a)
Mitigation measures must be in place if this exposure level is reached. Hearing protection will be available on site for all operatives working within the vicinity of this noise level.

Action level = >85dB(a)
Immediate precautions must be in place to reduce the noise level. This will include mandatory hearing protection, removal of operatives from high noise areas, reducing time limits spent at this noise level.

Best Practice Guidelines for the Control of Construction Noise
The site will comply with Chapter 1 of Part 5: Control of Noise at Work of the Safety, Health and Welfare at Work (General Application) Regulations 2007. This includes:

Selection of Quiet Plant
This practice is recommended in relation to static plant such as compressors and generators. It is recommended that these units be supplied with manufacturers' proprietary acoustic enclosures. The potential for any item of plant to generate noise will be assessed prior to the item being brought onto the site. The least noisy item should be selected wherever possible. Should a particular item of plant already on the site be found to generate high noise levels, the first action should be to identify whether or not said item can be replaced with a quieter alternative.

Noise Control at Source
If replacing a noisy item of plant is not a viable or practical option, consideration will be given to noise control "at source". This refers to the modification of an item of plant or the application of improved sound reduction methods in consultation with the supplier. For example, resonance effects in panel work or cover plates can be reduced through stiffening or application of damping compounds; rattling and grinding noises can often be controlled by fixing resilient materials in between the surfaces in contact.

Referring to the key noise generating sources during the construction phases, the following best practice migration measures should be considered:

- Mobile plant should be switched off when not in use and not left idling.
- For steady continuous noise, such as that generated by diesel engines, it may be possible to reduce the noise emitted by fitting a more effective exhaust silencer system.
- For percussive tools such as concrete breakers, several noise control measures include fitting muffler or sound reducing equipment to the breaker 'tool' and ensure any leaks in the air lines are sealed. Erect localised screens around breaker or drill bit when in operation near noise sensitive boundaries.
- For concrete mixers, control measures should be employed during cleaning to ensure no impulsive hammering is undertaken at the mixer drum.
- For all materials handling ensure that materials are not dropped from excessive heights, lining drops chutes and dump trucks with resilient materials.
- For compressors, generators, and pumps, these can be surrounded by acoustic
- lagging or enclosed within acoustic enclosures providing air ventilation.
- All items of plant should be subject to regular maintenance. Such maintenance can prevent unnecessary increases in plant noise and can serve to prolong the effectiveness of noise control measures.

Screening

Screening is an effective method of reducing the noise level at a receiver location and can be used successfully as an additional measure to all other forms of noise control. Standard construction site hoarding with a mass per unit of surface area greater than 7 kg/m2 can provide adequate sound insulation. Construction site hoarding will be required around the site boundary during demolition and excavation phases along the Eastern & Southern site boundaries.

3.2 AIR QUALITY MONITORING

Appropriate Air Quality and Dust monitoring will be carried out as and when required and records will be kept of all such monitoring for review by the Planning Authority.

3.3 MIGRATING DUST & DIRT POLLUTION

Townmore will ensure that all construction vehicles that exit the site onto the public roads will not transport dust and dirt to pollute the external roadways. This will be achieved through a combination of the following measures: -

- Ensuring construction vehicles have a clean surface to travel on within the site (i.e., haul road)
- Ensuring all construction vehicles are inspected by the gateman for cleanliness prior to exiting the site

The use of appropriate water-based dust suppression systems will greatly reduce the amount of dust and windborne particulates as a result of the construction process. This system will be closely monitored by site management personnel particularly during extended dry periods and in accordance with site management methods.

The aim is to ensure good site management by avoiding dust becoming airborne at source. This will be done through good design and effective control strategies. In addition, good site management will include the ability to respond to adverse weather conditions (e.g., wind) by either restricting operations on-site or using effective control measures quickly before the potential for nuisance occurs:

- During working hours, operational staff on site will monitor dust control methods as appropriate.
- Complaint registers will be maintained on site detailing all telephone calls and letters of complaint received in connection with construction activities, together with details of any remedial actions carried out.
- Regular Toolbox Talks / briefings will be given to construction staff, subcontractors, and operatives to raise awareness of the need to minimise dust. The implementation of dust suppression will be monitored, reviewed and any actions required addressed on an ongoing basis.
- At all times, the procedures put in place will be strictly monitored and assessed.
- The dust minimisation measures shall be reviewed at regular intervals during the construction phase to ensure the effectiveness of the procedures in place and to maintain the goal of minimisation of dust using best practice and procedures. In the event of dust nuisance occurring outside the site boundary, site activities will be reviewed, and satisfactory procedures implemented to rectify the problem. Specific dust control measures to be employed are highlighted below.

Dust Control – Site Roads

Site roads (particularly unpaved) can be a significant source of fugitive dust from construction sites if control measures are not in place. However, effective control measures can easily be enforced. The most effective means of suppressing dust emissions from unpaved roads is to apply speed restrictions. Studies show that these measures can have a control efficiency ranging from 25% to 80%.

- A speed restriction of 5km/hr. will be applied as an effective control measure for dust for on-site vehicles
- Bowsers will be available during periods of dry weather throughout the construction period. Research has found that the effect of watering is to reduce dust emissions by 50%. The bowser will be used during dry periods to ensure that unpaved areas are kept moist. The required application frequency will vary according to soil type, weather conditions and vehicular use
- Any hard surface roads will be swept to remove mud and aggregate materials from their surface while any unsurfaced roads shall be restricted to essential site traffic only.

Dust Control – Land Clearing/Earth Moving

Land clearing / earth-moving during periods of high winds and dry weather conditions can be a significant source of dust.

During dry and windy periods, and when there is a likelihood of dust nuisance, a bowser will be used to ensure moisture content is high enough to increase the stability of the soil and thus suppress dust. If this fails to adequately address the dust levels, then this activity will temporarily cease for the duration of the adverse weather.

Dust Control – Public Roads

Spillage and blow-off of debris, aggregates and fine material onto public roads should be reduced to a minimum by employing the following measures:

- Vehicles transporting material with potential for dust emissions to an off-site location
- shall always be enclosed or covered with a tarpaulin to restrict the escape of dust
- Public roads outside the site shall be regularly inspected for cleanliness, as a minimum
- daily, and cleaned as necessary. A road sweeper will be deployed as required to ensure that public roads are kept free of debris.
- The wheels of all Lorries will be inspected prior to leaving the site so that traffic leaving the site compound will not generate dust or cause the build-up of aggregates and fine material in the public domain.

4.0 TRAFFIC MANAGEMENT

4.1 ACCESS TO THE SITE

It is proposed that construction traffic will access the site via the R114 Firhouse Road. This is a residential area and is a busy road with public vehicles and pedestrians.

A competent Gateman/banksman will be directing construction traffic.

Site access for all personnel, visitors and deliveries will be controlled via manned entry gates. A turnstile system will be in place at the pedestrian entrance that will prevent unauthorised access. The vehicle gate will be controlled by security guard / traffic marshal that will both direct traffic and prevent unauthorised access. All visitors will be directed to the site office to sign in and receive induction prior to entering the construction area.

A competent Gateman/banksman will be directing construction traffic.

4.2 CONSTRUCTION PARKING

There will be no parking available directly on site. However, parking will be available in the adjacent GAA pitch car park for construction staff.

4.3 VEHICLE MOVEMENTS DURING CONSTRUCTION

The most onerous construction period with regards to traffic generation is expected to be the site clearance and excavation stage, which will include the removal of excavated material away from the site. The volumes of traffic generated during this period are unlikely to be more than 10 two-way trips per hour. The total construction traffic volumes per hour are not significant in terms of the overall existing traffic flows. These flows are not expected to significantly impact on the capacity of the surrounding road network. We will seek to have most vehicle movements outside of peak traffic hours.

4.4 MINIMISE CONSTRUCTION VEHICLE MOVEMENTS

Construction vehicle movements will be minimized through; -

- Consolidation of delivery loads to/from the site and manage large deliveries on site to occur outside of peak periods.
- Use of precast/prefabricated materials where possible.
- ‘Cut’ material generated by the construction works will be re-used on site where possible, through various accommodation works.
- Adequate storage space on site will be provided.
- A strategy will be developed to minimise construction material quantities as much as possible.
- Construction staff vehicle movements will also be minimised as much as possible.

4.5 PUBLIC ROADS

A Visual Condition Survey (VCS) will be carried out of all surrounding streets prior to any site works

commencing with Photographic records kept of the existing layouts. Townmore will liaise with South Dublin county council Roads & Traffic Department to agree any changes to load restrictions and construction access routes for the site.

Measures will be put in place as required to facilitate construction traffic whilst simultaneously protecting the built environment.

All entrances and temporary roads will be continuously maintained for emergency vehicle access.

The following measures will be taken to ensure that the site, public roads and surroundings are kept clean and tidy:

- A regular programme of site tidying will be established to ensure a safe and orderly site.
- Food waste will be strictly controlled on all parts of the site.
- Mud spillages on roads and footpaths outside the site will be cleaned regularly and will not be allowed to accumulate.
- Gateman will inspect all vehicles priorto leaving site to prevent any muck/debris been brought onto the public road.
- In the event of any fugitive solid waste escaping the site, it will be collected immediately and removed.

4.6 PROJECT SPECIFIC TRAFFIC MANAGEMENT PLAN

A detailed project specific traffic management plan will be developed by contractor and agreed with South Dublin county Council prior to works commencing on site. This plan will be updated as required throughout the project.

Issues addressed in Traffic Management Plan will include:

- Public safety
- Construction traffic routes
- Deliveries' schedule
- Special deliveries (wide and long loads)
- Traffic flows
- Signage and lighting
- Road opening requirements
- Road closures
- Lighting

4.7 TRAFFIC MANAGEMENT AND ROAD SAFETY:

- We have identified the following potential impacts in respect of traffic during the construction phase:
- Additional HGV traffic along the proposed designated haul route which will have a slight short term adverse effect on the local road network during the construction works.
- Additional construction personnel car / light vehicle movements which will have an insignificant short-term adverse effect on the local road network during the construction works.
- Construction vehicle movements and works on the Dublin Road, such as when forming the new junction with the Proposed Development or when undergoing service connections on the public road, which will have a slight short-term adverse effect on traffic movements on the Dublin Road and inner relief roads in the vicinity of the Proposed Development. Separate risk assessments and TMP will be produced prior taking on board these issues should the need for this work arise.
- Construction vehicle movements and works on the Dublin Road, which will have a slight short-term adverse effect on pedestrian and cycle movements in the vicinity of the development, for example due to pedestrians and cyclists having to give way at the construction access to the Site and/or divert around construction works the Dublin Road.

- By creating one crane off-loading areas within the site boundary all offloading will be possible in a manner which will minimize any risk to the public. The gate person will then assist in the entry and leaving from the site.

Key issues in dealing with traffic management on site are:

- Keeping pedestrians and vehicles apart
- Minimising vehicle movements
- People on site
- Turning vehicles
- Visibility
- Signs and instructions

Please see appendix for traffic management plan showing locations of entrance, crossing points & signage to be erected in accordance with chapter 7. The entrance and potential vehicle movements of the site have been risk assessed by a specialist contractor. Their recommendations are shown on the plan and will be implemented by Townmore.

5.0 PROTECTION OF NEIGHBOURING STRUCTURES

5.1 MONITORING

Ground vibration may also potentially occur during the construction phase. Vibration can be measured in terms of Peak Particle Velocity (PPV), this is expressed in millimetres per second (mm/s). Vibration standards can be considered in two varieties: those dealing with human comfort and those dealing with cosmetic or structural damage to buildings. For example, vibration is perceptible at around 0.5mm/s in the case of road traffic, however at higher magnitudes, this vibration may become an annoyance.

Compacting road material is considered the primary sources of vibration during the construction phase of a project. These would occur at higher levels of vibrations (up to 12mm/s and 6mm/s respectively), and this can be tolerated for events of a short duration.

Vibration monitoring may be in place during groundworks phase of the project. Monitors will be placed at the perimeter of the site and monitored daily. The monitors will be set to send an SMS update if vibration levels reach 2mm/s. Records of the daily highs will be recorded and kept on site for review.

Specialist contractors may be appointed to provide monitoring throughout demolition and construction works either continuously or periodically as agreed.

Movement will be monitored through a weekly survey of targets fixed to adjoining structures or any structures deemed within the zone of influence of the construction works. A Dilapidation survey will be carried out by an independent consultant prior to any works being carried out.

A vibration monitoring strategy will be implemented on site should this be required.

6.0 Waste Management Plan – Construction Phase

Waste materials generated by earthworks and construction activities will be managed according to the Department of the Environment, Heritage and Local Government's 2006 Publication - Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects.

The Waste Management Plan will specifically address the following points: -

- Analysis of waste arising / material surpluses
- Specific Waste Management objectives for the Project including the potential to reuse and process on-site demolished buildings for further use in the construction phase.
- Methods proposed for Prevention, Reuse and Recycling
- Waste Handling Procedures
- Waste Storage Procedures
- Waste Disposal Procedures
- Waste Auditing
- Record Keeping

6.1 WASTE MINIMISATION

It is proposed to stockpile excavated material on the site and then excavate directly into trucks and remove from the site.

Construction Waste minimisation and prevention shall be the primary responsibilities of the Purchasing Manager and the Project Manager for the Contractor during construction of the buildings, and they shall ensure the following: -

- Materials will be ordered on a 'just in time' basis to prevent over supply and site congestion.
- Materials shall be correctly stored and handled to minimise the generation of damaged materials.
- Materials shall be ordered in appropriate sequence to minimise materials stored on site.
- Sub-contractors will be responsible for similarly managing their wastes.

In addition, as the useable area for construction is confined the contractor will need to carefully manage storage of materials on site.

Lockable COSHH Storage Cabinet to be used on site to house construction related fuel and oil.

6.2 CONSTRUCTION WASTE DISPOSAL MANAGEMENT

It is that from the outset of construction activities, a dedicated and secure compound containing bins and/or skips, into which all waste materials generated by construction site activities will be established at the site.

To ensure that construction staff correctly segregate waste materials, it will be the responsibility of the Townmore Site Manager to ensure all staff are informed by means of clear signage and verbal instruction and made responsible for ensuring site housekeeping and the proper segregation of construction waste materials. This will be clearly re-layed to all contractors in Pre-start meetings and again at Site Induction.

The groundworks contractor will confirm the location of the muck-away from the bulk dig and ensure detailed records are kept & all quantities and natures of wastes exported off-site are maintained in a Waste File at the Project office and that all contracted waste haulage drivers hold an appropriate Waste Collection Permit for the transport ofwaste loads.

6.3 ON-SITE WASTE REUSE AND RECYCLINGMANAGEMENT

Due to the confined nature of the site (as building works are proposed on roughly the full footprint), there are minimal materials that can be reused or recycled on the site. other clay, gravel and compacted topsoil materials generated during excavation will be taken off site for reuse.

6.4 INERT WASTES

The waste materials that will be generated from the site excavation will be broken down concrete, inert clays, gravels, compacted topsoil, and some timber waste materials. The steel fencing and propping that is currently in place will be removed from the site and recycled off site.

The waste material generated by construction works will be mixed Construction & Demolition (C&D) waste, comprising of concrete, bricks and blocks. Material will be sorted and separated on site into different classifications for removal off site which is considered standard procedure.

Any wood waste generated by site works will be inspected and examined and will be segregated as re- useable wood and scrap wood waste.

6.5 HAZARDOUS WASTES

While it is not anticipated to encounter hazardous wastes on the site, should any be encountered, the following procedure should be followed. The management of all hazardous waste arising (such as but not limited to asbestos and lead) if they occur, shall be coordinated in liaison with Health and Safety Management.

6.6 CONTAMINATED SOIL

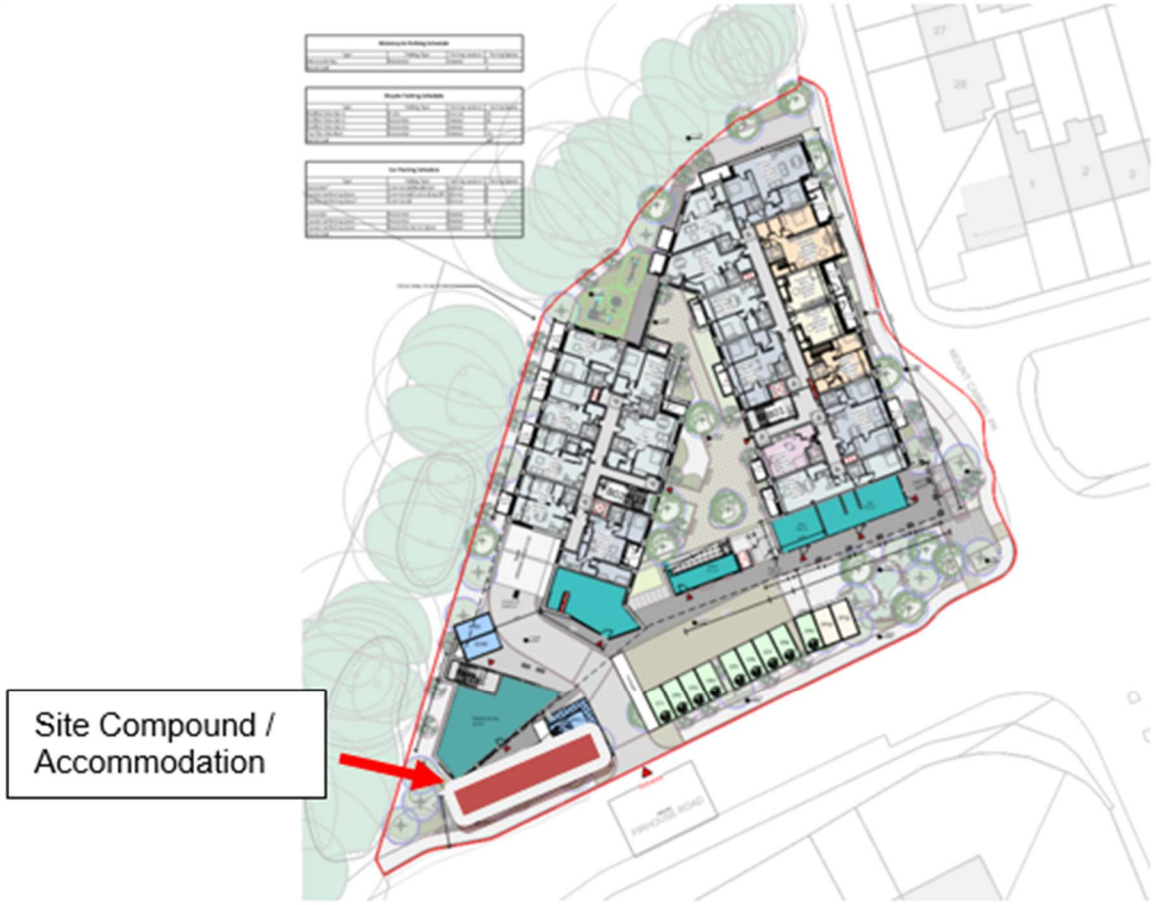
While it is not anticipated that there will be any contaminated soil on the site - as there have been no indications of any contamination was encountered during trial hole works or extensive boreholes, should contamination be discovered in whatever form, the following principals will be followed: -

Where it is discovered that existing grounds including top and sub soils may be contaminated by fuel oil hydrocarbons, these areas of ground will be isolated, tested for contamination, and pending the results of laboratory testing, will be excavated and exported off-site by an appropriately Permitted Waste Contractor

holding an appropriate Waste Collection permit and that this hazardous material will be sent for appropriate treatment / disposal to an appropriately Permitted / Licensed Waste Facility. It is the responsibility of the Project Manager or his/her delegate that a written record of all quantities and natures of wastes reused / recycled during the project are maintained in a Waste File at the Project office.

Prior to commencement on site, it is to undertake a further detailed site investigation of the site. As part of this, soils will be tested on a grid system for potential contaminates and the soils across the site will be classified in cells in a Waste Classification Report. The results of this Report will be used to assess the locations where soil being excavated from the site can be directed to.

Appendix 1 - Site Logistics



FLYNN FURNEY
ENVIRONMENTAL CONSULTANTS

Large-Scale Residential Development: No. 2 Firhouse Road and the former 'Morton's The Firhouse Inn', Firhouse Road, Dublin 24

Ecological Impact Assessment Report

By: Flynn, Furney Environmental Consultants

For: Bluemont Developments (Firhouse) Limited

Date: December 2023

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1 EXECUTIVE SUMMARY

This report examines the ecological considerations of a proposed residential development in Firhouse, in South Dublin County. The proposed development is located on lands located at No. 2 Firhouse Road and the former 'Morton's The Firhouse Inn', Firhouse Road, Dublin 24. The site includes the former Firhouse Inn public house which has ceased trading.

Bluemont Developments (Firhouse) Limited., intend to apply for permission for a Large-Scale Residential Development (LRD) at No. 2 Firhouse Road and the former Morton's The Firhouse Inn, Firhouse Road, Dublin 24. The site is also bound by Mount Carmel Park to the east.

The proposed development seeks to provide for the demolition of all existing structures on site, including the 2-storey building formally used as public house ancillary off-licence & associated structures on the east of the site; a 2-storey building comprising an existing barber shop and betting office to the west of the site; single-storey cottage building and associated structures in the centre of the site; and gated entrance from Mount Carmel Park.

The proposal includes the construction of 100 no. residential units within 2 no. blocks ranging in height from 3- 5-storeys (over lower ground floor and basement level) comprising; 96 no. apartments, (providing 3 no. studio units, 45 no. 1-bedroom units, 9 no. 2-bedroom (3-person) units, 36 no. 2-bedroom (4-person) units, and 3 no. 3-bedroom units); and 4 no. duplex units (providing 2 no. 1-bedroom units and 2 no. 2-bedroom (4-person) units). The apartment blocks will consist of the following:

- Block 01 – 5-storey apartment block (3-storeys rising to 5-storey over basement levels) comprising 48 no. apartment units as follows: 2 no. studio units, 22 no. 1-bedroom units, and 20 no. 2-bedroom apartments units, along with 4 no. duplex units comprising 2 no. 1-bedroom units and 2 no. 2-bedroom duplex units. Each unit will have its own private open space in the form of a private balcony or terraced area.
- Block 02 – 5-storey apartment block (over basement levels) comprising 52 no. apartment units as follows: 1 no. studio unit, 23 no. 1-bedroom units, and 25 no. 2-bedroom units, and 3 no. 3-bedroom units. Each unit will have its own private open space in the form of a private balcony or terraced area.

The development will also provide for 355 sq. m. of non-residential/commercial development as follows:

- 1 no. café and 1 no. office located at ground floor level of Block 01 fronting onto Firhouse Road;
- 1 no. creche and associated play area to the rear of Block 01;
- 1 no. barbershop at ground floor level located between Block 01 and Block 02 fronting Firhouse Road;
- 1 no. bookmaker and 1 no. medical consultancy at ground floor level of Block 02, fronting onto Firhouse Road.

The proposed development will provide for 80 no. car parking spaces including accessible parking and Electric Vehicle parking across basement and lower ground floor levels; set down area; 270 no. bicycle parking spaces; 8 no. motorbike parking spaces; landscaping, including communal open space and public open space and children's play spaces; SuDS measures; boundary treatment; public lighting; ESB substation; plant and waste storage areas; associated signage details; all associated site and infrastructure works necessary to facilitate the development, including the relocation of existing watermain and surface water sewer on the site; vehicular access to the development will be via the exiting access off the Firhouse Road, with 1 no. pedestrian and cyclist access from Firhouse Road and 1no. pedestrian and cyclist access from Mount Carmel Park.

This report describes the ecological surveys carried out to facilitate the planning, design and construction of the proposed scheme. Appendix 1 shows an overall map of the area with the location of the scheme shown.

The purpose of this report is to provide an Ecological Impact Assessment of the proposed development. In order to inform this, a range of studies and surveys were undertaken by the authors. These include:

- Desktop Study of available resources on the ecological features, constraints and records
- A walkover survey of the site under study
- An assessment of the habitat types
- Species composition of habitats occurring within the site
- A mammal survey of the site and adjacent lands
- Bat habitation and habitat surveys

- Invasive species surveys
- Bird nesting activity survey

The results of all of the above surveys have been used to carry out an Ecological Impact Assessment of the proposed project. Arising from this, a number of impact mitigation measures have been recommended. These will assist in formulating the final design of the proposed development.

1.1 Details of Surveys Carried Out

Surveys were carried out in September 2020 and June 2023. Surveys were carried out at various times of year in order to be completed within optimal period.

Survey	Date(s) Completed
Walkover Survey & Habitat Assessment	September – October 2020
Mammal and Tree Surveys	January 2021
Initial Bat Surveys	October 2020
Bat Survey and Assessment of Trees	August 2021
Bat Survey and Search of Buildings	May 2022
Invasive Species Survey	May 2022
Breeding Birds	May 2022
Invasive Species Survey	July 2023
Bat Surveys and Search of Buildings	May-June 2023

Given the built nature of the habitats to be directly affected by the proposed development and the breadth of surveys undertaken, it is not considered that any seasonal constraints were significant for the purpose of this assessment.

1.2 Habitats Within Area Under Survey

A relatively limited range of habitats occurs within the immediate area under survey. The proposed development is within a very confined area and this is entirely 'built' habitat. Immediately adjacent this, however, is a mature treeline of both ecological and landscape

significance. To the north of this, agricultural grasslands are the dominant habitat type. Adjacent these and extending for many kilometres to the northeast, east and west are the amenity grasslands that make up the Dodder Valley Linear Park. The River Dodder is the only watercourse within the area under study. This is an important ecological feature of the area.

1.3 Notable Flora

No rare, threatened or protected floral species as per the Red Data Book (Curtis and McGough, 1988) were found. No species listed in the Flora Protection Order (2022) were found to be growing within the site. No such species were recorded within the area of works. The area proposed for development is a heavily modified habitat.

1.4 Trees and Treelines

Older and long-established trees were also targeted by the survey. As well as this, older trees that were notable as either 'veteran 'or 'champion' trees were specifically sought. Veteran trees are large specimens of mature trees that offer much habitat of themselves. Champion trees are those that are taller, older or larger than other of their particular species. While there are mature treelines immediately adjacent the site, the proposed works will not involve the loss of any mature trees.

1.5 Notable Fauna

Signs of any protected mammal species were sought. The refugia (resting places such as badger setts) were also sought.

There were no setts or signs of activity of Badgers within area under study. Much of the wider area surveyed would be unsuitable habitat for badger sett location but the Dodder Valley Park would be an important corridor for this species.

No evidence of Otter activity was recorded and no Otter holts occur within close proximity to the proposed development. However, it is very likely that this species would hold territories on the River Dodder. Fox spraints indicated activity of this species close to the proposed site ofworks.

Dedicated surveys for sites suitable for bat roosts (e.g. buildings & large mature trees) were also carried out. Potential bat roost habitat exists within the Firhouse Inn buildings. However, no evidence of bat occupancy was found. The mature trees immediately adjacent the site were also surveyed but these do not offer any potential bat roost habitat and no bat roosts were confirmed here over several surveys.

All bird species seen and heard during surveys were recorded. The greater majority of the birds recorded were of least conservation concern (Birdwatch Ireland).

1.6 Invasive Species

Mature Sycamore (*Acer pseudoplatanus*) trees occur in the treeline immediately adjacent the Firhouse Inn and also within other treelines outside the site. This species is designated by Invasive Species Ireland as an invasive species of *medium* impact. *Buddleja davidii* is another *medium* impact species that occurs within the site. No invasive species subject to legal controls occur here.

1.7 Potential Impacts

No impacts upon any area designated for the conservation of nature are predicted, including the nearby River Dodder pNHA. As the proposed development will be on modified or built habitat, no direct impacts of any significance are predicted upon these. No loss of any other habitat type will occur, so no direct impacts are predicted on these. The River Dodder is an ecologically sensitive area and is within 200m of the proposed development. However, given the confined and limited nature of the development, no direct or indirect impacts to this river are predicted. This is largely based on the lack of hydrological connectivity between the proposed development and the river.

No habitat suitable for breeding birds will be impacted upon. No evidence of previous bird nesting was seen within the structure.

A number of dedicated bat surveys did not find any evidence of bat habitation. However, the survey showed suitable gaps in the roof for bat access/egress. The Firhouse building has a number of annexes and extensions, offering *potential* roost locations for bats. None have been found over any of the surveys carried out.

While Sycamore and *Buddleja davidii* (both invasive alien plant species) occur immediately adjacent and within the site proposed for development respectively, there is negligible potential for either species to have any significant negative impacts.

1.8 Proposed Mitigation

A schedule of proposed mitigation measures has been drawn up to address the potential impacts predicted. This range of measures includes timing of works, further survey and the avoidance of sensitive areas adjacent the proposed development site and the creation of artificial bird nesting habitat.

2 LEGISLATION AND PLANNING POLICY

2.1 European Council Directives

2.1.1 Council Directive on the Conservation of Natural Habitats of Wild Fauna and Flora (92/43/EEC) (The Habitats Directive)

The main aim of the Directive is to promote the maintenance of biodiversity through the conservation of natural habitats and wild species listed on the Annexes of the Directive. Member States are required to take measures to maintain or restore, at favourable conservation status, biodiversity whilst taking account of economic, social, cultural requirements and regional and local characteristics.

It gives effect to site and species protection measures through establishment of the Natura 2000 network and designation of European Sites including Special Areas of Conservation (SAC) and Special Protected Areas (SPA). It also establishes a list of species (other than birds) whose habitats must be protected to secure their survival. These priority species and habitats are subject to a higher level of protection.

The Directive also requires appropriate assessment of any plan or project not directly connected with or necessary to the management of a European Site, but likely to have significant effects upon a European site, either individually or in combination with other plans or projects.

2.2 Council Directive on the Conservation of Wild Birds (2009/147/EC) (The Birds Directive)

The Directive provides a framework for the conservation and management of, and human interactions with, wild birds in Europe. It makes provisions for the maintenance of the wild bird populations across their natural range; conserves the habitats for rare or vulnerable species listed in Annex I and of migratory species through the classification of SPAs and provides protection for all wild birds.

2.3 Irish Legislation

2.3.1 The European Communities (Birds and Natural Habitats) (Amendment) Regulations 2015 (S.I. No. 355 of 2015)

The European Communities (Birds and Natural Habitats) (Amendment) Regulations provides that the following shall be construed together as one:

- Wildlife Act 1976
- Wildlife (Amendment) Acts of 2000, 2010 and 2012
- European Communities (Birds and Natural Habitats) (Restrictions of the Use of Poison Bait) Regulations 2010
- European Communities (Birds and Natural Habitats) Regulations 2011
- European Communities (Birds and Natural Habitats) (Amendment) Regulations of 2013, 2015
- Wildlife Amendment Bill 2016 (proposed legislation)

2.3.2 European Communities (Birds and Natural Habitats) Regulations 2011 to 2015

The Regulations give effect to requirements relating to the designation of protected sites under the Birds Directive and Habitats Directive. The Regulations provide for the protection and management of European Sites and place obligations on all public authorities to have regard to the requirements of the Habitats Directive beyond the realms of planning related consents issued under the Planning and Development Act 2000, as amended (the PDA). The Regulations also provide for the protection of species of European importance.

2.3.3 Wildlife Acts 1976 to 2012

The Acts provide for *inter alia* the protection of wildlife. The Acts prohibit the intentional killing, taking or injuring of certain wild birds or wild animals; or the intentional destruction, uprooting or picking of certain wild plants.

2.3.4 Wildlife Amendment Bill 2016

The purpose of the Bill is to provide for the implementation of a reconfiguration of the Raised Bog Natural Heritage Area Network arising from (i) the proposals from the Review of Raised Bog Natural Heritage Area Network published in January 2014; (ii) an assessment of the effects on the environment of the proposals arising from the Review and, if required, any other screening for an assessment or as the case may be, assessment, including public consultation undertaken and (iii) observations or submissions received during the course of public consultation.

Taken as a whole, nature conservation legislation is of key importance in undertaking EcIA for proposed development as it shapes planning policy.

2.4 Planning Policy

2.4.1 South Dublin County Development Plan (CDP)

The SDCC Development Plan (2022-2028) describes the Dodder Valley as holding 'significant historical archaeological and cultural importance.' It goes on to describe the significant importance of its natural character and accessibility in terms of the opportunities that it offers for engagement of local residents with nature as well as recreation. Its importance as a walking and cycling route is also emphasised. Policy NCBH [Natural, Cultural and Built Heritage] 8 is set out in the plan to: Protect and enhance the visual, recreational, environmental, ecological, geological and amenity value of the Dodder Valley, as a key element of the County's Green Infrastructure. Policy NCBH16 promotes and supports the development of a tourist amenity and educational/interpretative centre within the Dodder Valley. The development plan also sets out a number of strategic Green Infrastructure Corridors of which The Dodder River is one. The Green Infrastructure Policy GI7 is to 'Protect, conserve and enhance landscape, natural, cultural and built heritage features and support the objectives and actions of the County Heritage Plan.' Among the overarching objectives of the Green Infrastructure Plan are: to recognise, protect and enhance the role of the River Dodder Corridor as a key route for biodiversity and protected species, to protect and enhance the

River Dodder Corridor as an area of heritage, geology, special amenity and recreation and to protect the green and blue infrastructure of the Dodder

3 DESK STUDY

Prior to the main fieldwork contributing to this assessment, a desktop survey of available information sources was carried out. These included:

- The National Biodiversity Data Centre Online Database
- The National Biodiversity Network Online Atlas
- The OSI Geohive Database
- The NPWS Protected Species Database and Online Mapping
- The Environmental Protection Agency Mapping Database
- www.sdcc.ie
- Biology.ie

Desk research also included a review of records available through the National Biodiversity Data Centre mapping system. These included rare and protected species. Records were requested for all species appearing within the study area or immediately surrounding the study area.

Designated sites were identified using the current boundary shapefiles downloaded from the NWPS website. Records of species from within the relevant Km squares were also obtained. Habitat mapping also reviewed included the Irish Semi-Natural Grassland Surveys (ISGS), the National Survey of Native Woodland (NSNW) and Ancient woodland inventory.

4 FIELD STUDY

Field work for this project was carried out between September 2020 and July 2023. The field survey habitat assessments were carried out according to guidelines given by the Heritage Council (2011) and the JNCC (2010) as well as the NRA/TII (2010). The primary purposes of the field survey were to:

- Identify habitat types within the study area
- Assess for the presence of protected species of flora and fauna
- Identify ecological and environmental constraints to the construction of this development
- Identify ecological sensitivities around and within the study area.

A walkover survey considered a broad area in order to ensure all other important features that could be impacted by the development were considered (e.g. significant treelines and hedgerows, mammal paths and watercourses). Gross habitat mapping was carried out and was a key output of this survey (See mapping document in Appendix A). The field survey was also used to identify areas of greater environmental/ecological sensitivity. These were recorded as Ecologically Sensitive Areas (ESAs) and at this stage were flagged for further study if required. The survey also established any further fieldwork requirements/limitations - e.g. where a site could not be accessed or a significant seasonal restraint exists.

5 General Ecology and Habitats

5.1 Introduction

The purpose of the ecology survey was to:

- Classify and map the habitats according to Fossitt (2000) and where appropriate the Habitats Directive (European Commission, 2013) classification scheme.
- Carry out an inventory of flora and fauna, particularly mammals and birds, in each section.
- Identify Ecologically Sensitive Areas in the study area if these exist
- Prepare a GIS database of habitat mapping, rare species records, invasive species and other ecological and management features.

About the authors

The survey and reporting was carried out by ecologists Billy Flynn, Ian Douglas, Aidan Meehan and Seán Meehan. Billy Flynn is project manager, Seán Meehan and Aidan Meehan undertook the bat surveys and assessment. Ian was responsible for the overall GIS habitat mapping. All of the team members are qualified and experienced ecologists.

5.2 Methodology

5.2.1 Desk study and consultations

Designated site data was downloaded from the NPWS website. Other online mapping reviewed included Geohive maps, aerial photography and EPA shapefile datasets[1]. Habitat mapping reviewed included the Irish Semi-Natural Grassland Surveys (ISGS), the National Survey of Native Woodland (NSNW) and the Ancient and long established

[1] www.gis.epa.ie/

Woodland (NPWS shapefiles). Desk research also included review of records available through the National Biodiversity Data Centre mapping system.

5.3 Field surveys

5.3.1 Un-surveyed areas

Access to the site proposed for development was readily achieved in all of the areas under survey.

5.3.2 Habitats and flora

Habitats within the study area were mapped according to level 3 of the Heritage Council classification (Fossitt, 2000) following the Heritage Council's Best Practice Guidance (Smith et al., 2011) and the Joint Nature Conservation Committee's (JNCC) Handbook for Phase 1 Habitat Survey – a technique for environmental audit (JNCC, 2010). The Heritage Council's *A Guide to Habitats in Ireland* (Fossitt, 2000) is the standard habitat classification system used in Ireland.

Habitats were also assessed for correspondence to the Habitats Directive Annex I habitat types (European Commission, 2013). Habitats of high species diversity or rarity within the local context and sensitive habitats were classified as Ecologically Sensitive Areas (ESAs).

Habitats and flora field surveys were carried out over a number of site visits undertaken between 2020 and 2023. Habitats were mapped by annotating aerial photographs in the field and OSI vector maps in the field and using GPS point.

A list of relevant vascular and other plant species was recorded from each area. Invasive plant species (where found) were recorded using a GPS. No occurrence of Third Schedule Invasive Species was recorded. These are species whose propagation or spreading is strictly controlled by regulations.

The initial survey was carried out in October 2020 which is late in the flowering season, therefore some early flowering plant species may have been missed. However, the area proposed for development is a highly modified one with no natural or semi-natural habitats extant here. Subsequent site visits were carried out in order to verify the results of the original survey.

5.3.3 Ecological Impact Assessment Methodologies

This ecological impact assessment has been prepared in accordance with relevant legislation and best practice guidance including:

The Chartered Institute of Ecology and Environmental Management Guidelines for Ecological Impact Assessment in the UK and Ireland: terrestrial, freshwater and Coastal 2nd Edition. CIEEM (2018).

- The EPA's Draft Advice Notes on Preparing Environmental Impact Statements (EPA, 2015a).
- The EPA's Draft Revised guidelines on Information to be Contained in Environmental Impact Statements (EPA, 2015b).
- Guidelines for Assessment of Ecological Impacts of National Road Schemes (NRA, 2009).

Ecological features (habitats and species) were evaluated for their conservation importance according to the National Roads Authority's scheme (NRA 2009). For habitats or species, significance of effects was assessed with reference to their conservation status, abundance and distribution. Description of significant effects follows guidance outlined in the EPA Draft Revised Guidelines on the Information to be Contained in EIS (EPA, 2015b). The term 'significant effect' as used in this report follows guidance (CIEEM, 2018) and is an effect that either supports or undermines biodiversity conservation

objectives for 'important ecological features' or for biodiversity in general. In the case of designated sites, a negative significant effect would be one that undermines the conservation objectives and targets for that site. The significance of impacts on habitats was determined with reference to the value of the feature being affected and the magnitude of the impact. Impacts are considered ecologically significant at a stated geographic scale or are considered not significant.

6 Results

6.1 Designated Areas

All sites designated for the conservation of nature within 15km of the proposed works are detailed in Table 1 – Table 2.

Table 1: Designated sites with 15km of the Proposed Project Area

Site Code	Site Name	Designation	Distance from the Site
4040	Wicklow Mountains SPA	SPA	5.7km
4024	South Dublin Bay and River Tolka Estuary SPA	SPA	9.9km
4006	North Bull Island SPA	SPA	11.5km
1209	Glenasmole Valley SAC	SAC	3.9km
2122	Wicklow Mountains SAC	SAC	6.0km
210	South Dublin Bay SAC	SAC	9.9km
206	North Dublin Bay SAC	SAC	11.2km
725	Knocksink Wood SAC	SAC	11.4km
1398	Rye Water Valley/Carton SAC	SAC	13.5km
713	Ballyman Glen SAC	SAC	14.0km
991	Dodder Valley	pNHA	180m
1209	Glenasmole Valley	pNHA	3.9km
2104	Grand Canal	pNHA	5.1km
1212	Lugmore Glen	pNHA	5.2km
1753	Fitzsimon's Wood	pNHA	6.6km
128	Liffey Valley	pNHA	7.6km
211	Slade Of Saggart And Crooksling Glen	pNHA	7.8km
1205	Booterstown Marsh	pNHA	9.3km
2103	Royal Canal	pNHA	9.4km
210	South Dublin Bay	pNHA	9.9km
1202	Ballybetagh Bog	pNHA	10.8km
201	Dolphins, Dublin Docks	pNHA	10.9km

1207	Dingle Glen	pNHA	11.2km
725	Knocksink Wood	pNHA	11.4km
1755	Glencree Valley	pNHA	11.5km
206	North Dublin Bay	pNHA	11.5km
1398	Rye Water Valley/Carton	pNHA	13.5km
178	Santry Demesne	pNHA	13.5km
1211	Loughlinstown Woods	pNHA	13.8km
1768	Powerscourt Woodland	pNHA	13.8km
713	Ballyman Glen	pNHA	14.0km
1206	Dalkey Coastal Zone And Killiney Hill	pNHA	14km
1394	Kilteel Wood	pNHA	14.2km

A total of 7 sites designated as SACs and 3 sites designated as SPAs were recorded within 15km of the proposed development. The nearest Natura designated sites were Wicklow Mountains SAC and Wicklow Mountains SPA, around 6 km from the proposed works.

A total of 24 proposed National Heritage Areas (pNHAs) were also recorded with 15km of the proposed development. The closest being River Dodder pNHA, around 180m to the north of the Firhouse Inn site. Given the proximity of the River Dodder to the proposed site of works, potential impacts on this designated site are considered further in this report.

An Appropriate Assessment Screening exercise was carried out in order to determine the potential for the proposed development to have significant effects on Natura 2000 sites (SACs and SPAs) within 15km of the proposed works. It was determined that no such significant effects were considered likely.

No risks to the conservation objectives of any other sites listed in table 1 are considered likely due one or more of the following:

- Lack of connectivity between the proposed development and the designated area.

- Significant buffer between the proposed works area and the designated area
- No impact or change to the management of the designated area or;
- No change to chemical or physiological condition of the designated site as a result of the proposed development.

6.2 Overview of habitats and classification

An overview of the main habitats recorded within the study area and the classification applied is provided here. More detail is provided in the description of habitats within each section.

6.2.1 Built Areas (BL3)

All of the site proposed for development would conform to this habitat type. All of this area has been heavily modified and there are no semi-natural or natural habitats present. The extant buildings do hold potential habitat for bat species and a limited number of bird species. This is dealt with in Section 11 of this report.

6.2.2 Treelines (WL2)

There are no trees or treelines within the site proposed for development. However, there are several mature treelines within the wider area under survey. These include a mature mixed treeline immediately adjacent the site. This is dominated by large mature Sycamores (*Acer pseudoplatanus*). There is also Beech (*Fagus sylvatica*) and Horse Chestnut (*Aesculus hippocastanum*). Sycamore is the most numerous of the three species. The trees are large (up to 20m in height and with a canopy spread of up to 8m).

6.2.3 Scrub (WS1)

This broad category includes areas that are dominated by at least 50% cover of shrubs, stunted trees or brambles. The canopy height is generally less than 5 meters. Scrub develops as a precursor to woodland or as a result of recent disturbance and was often

found in less accessible riverside locations and in marginal areas such as on woodland edges. Scrub was only occasional within most of the study area.

6.2.4 Improved Agricultural Grassland (GA1)

The lands immediately adjacent to the existing Firhouse Inn would conform to this category. This is a relatively species-poor habitat type that is dominated by a few agricultural grasses such as Cocksfoot (*Dactylis glomerata*) and Bent grasses (*Agrostis* spp.). Other abundant plants here include Creeping Buttercup (*Ranunculus repens*) and White Clover (*Trifolium repens*). These lands have been grazed in recent times.

6.2.5 Mixed Broadleaved woodland (WD1)

Fossit describes this general category of woodlands as areas with 75-100% cover of broadleaved trees, and 0-25% cover of conifers. Mixed broadleaved woodland is used in situations where woodland stands cannot be classified as semi-natural or are clearly planted. These plantings appear to have replaced the riparian woodland (WN5) that would be expected to be found in a river valley such as this. A broad mixture of species that includes Hazel (*Corylus avelana*), Hawthorn (*Crataegus monogyna*) and Elder (*Sambuccus nigra*) is found. In smaller numbers, some Holly (*Ilex aquilifolium*) and Cherry Laurel (*Prunus laurocerasus*) also occurs. There is some Bramble scrub occurring within and on the edge of some of these areas.

6.2.6 Amenity Grassland (GA2)

This habitat type occurs in the lands to the north of the site and the agricultural grassland described above. This habitat type makes up much of the Dodder Valley Linear Park which is within around 100m of the site proposed for development. This grassland type is also rather species-poor and dominated by a few grass species such as Bent grasses and

Meadow grasses. Clovers (*Trifolium* spp.) are abundant here and Plantains (e.g. *Plantago lanceolata*) and Thistles (*Cirsium* spp.) are occasional.

6.2.7 Eroding upland Rivers (FW1)

The River Dodder is one of the three major rivers of Dublin City and it flows from its headwaters on Kippure Mountain along a course of 26km before it reaches its confluence with the River Liffey at Ringsend. It has a predominantly urban catchment and is thus vulnerable to storm-water and street runoff as well as sewage misconnections. Although the river is slower and wider where it passes close to the site at Firhouse, it retains the characteristics of an upland/eroding river. The banks of the River Dodder hold some areas of riparian woodland (see 6.2.9), an important habitat type that is unusual in urban areas as well as scrub (see 6.2.3 above). There are also some areas of semi-natural grassland. The Dodder valley is important 'corridor' habitat for a range of species, including Badger (*Meles meles*) a protected mammal species. Otter (*Lutra lutra*) is another protected mammal species that has been recorded in several locations on the Dodder (Roughan O'Donovan, 2017, Ní Lamhna, 2008). These are dealt with further in Section 7 of this report.

6.2.8 Scattered Trees and Parkland (WD5)

This category describes situations where scattered trees stand alone or in small clusters cover less than 30% of the total area under consideration but are a prominent structural or visual feature of the habitat. This describes some areas of the Dodder Valley Park where amenity grassland is scattered with trees of a range of species.

6.2.9 Riparian Woodland (WN5)

This woodland type includes wet woodlands of river margins and wooded islands within rivers. Tree species here are generally dominated by Willows (*Salix* spp.) and Alder (*Alnus glutinosa*) may also occur. It is an unusual habitat type for an urban area. Some of this habitat type occurs within the River Dodder Valley but only in limited areas. It does not occur within the area under survey.

Table 2: Other Habitats noted around the site

Habitat Types	Fossit Code	Note
Mixed Broadleaved/Conifer Woodland	WD2	This habitat type occurs within parkland in Dodder Valley Park.

6.3 Habitats Evaluation

Within the broader study area, a number of habitats occur. However, within the proposed for development, only Buildings and Artificial Surfaces occur. This is owing to the highly modified nature of the railway line and path/laneway/roadway proposed for development as Greenway. There are no designated conservation areas within the area proposed for development. There are no watercourses within this site and none that connect the site of proposed works and other more sensitive areas.

The table below gives a summary of the significance of the habitat types found within the survey area.

Table 3: Ecological significance of habitats within the site.

Ecological feature	Fossitt code	Evaluation	Rationale
Buildings and artificial surfaces	BL3	Low Local	None or limited vegetation.
Treelines	WL2	High Local	Mature treelines some containing notable mature trees.
Improved agricultural grassland	GA1	Low Local	Relatively low species-poor habitat type.
Amenity Grassland	GA2	Low local	Relatively low species-poor habitat type.
Mixed Broadleaved woodland	WD1	Moderate local, low regional	Areas of value to local wildlife.
Upland/Eroding River	FW1	High Regional/National	Freshwater habitat. Ecological corridors for birds and mammals. Part of site is pNHA.

Scattered Trees & Parkland	WD5	Moderate Local	Areas supporting woody vegetation some of local importance to wildlife
Scrub	WS1	Moderate Local	Important cover for birds. Low diversity overall
Mixed broadleaved/conifer woodland	WD2	Moderate Local, Moderate Regional	Low to moderately good for plants and invertebrates. Commonly important for bird species.
Riparian Woodland	WN5	High Regional	Habitat type has declined in recent years. Unusual in urban areas.

7 Ecological Impact Assessment

7.1 Introduction and Context

The impacts which may be expected from the development of the proposed route are assessed below. These possible impacts have been assessed under the CIEEM (2018) and the National Roads Authority guidelines (NRA, 2006). Criteria for assessment of duration of impacts used Environmental Protection Agency guidelines (EPA 2002). These provide guidance on assessing impact significance upon features of sites proposed for works. Impact significance must be given in context of their respective ecological value of the site and features under study.

The 'ecological value' of an area or feature therefore is defined with reference to geographical context. That is, whether it is of value locally, regionally, nationally or internationally. This is assessed by ecologists on reviewing survey outcomes. Key criteria are the presence of designated sites, the site or feature containing protected species or areas of high biodiversity. The criteria for ecological value are given in Table 16, below:

Table 4: Ecological Value Criteria

Ecological Value	Criteria
International	'European Sites' including Special Areas of Conservation (SAC) & Special Protection Areas (SPA). Sites that satisfy the criteria for designation as a 'European Site' (see Annex III of the Habitats Directive, as amended). Features essential to maintaining the coherence of the Natura 2000 Network. Sites containing 'best examples' of the habitat types listed in Annex I of the Habitats Directive. Resident or regularly occurring populations (assessed to be important at the national level) of the following: Species of bird, listed in Annex I and/or referred to in Article 4(2) of the Birds Directive; and/or Species of animal and plants listed in Annex II and/or IV of the Habitats Directive. Ramsar Sites

Ecological Value	Criteria
	World Heritage Sites (Convention for the Protection of World Cultural & Natural Heritage, 1972). Sites hosting significant species populations under the Bonn Convention Sites hosting significant populations under the Berne Convention
National	Areas of Special Scientific Interest (ASSI) or Natural Heritage Area (NHA). National Nature Reserves (NNR). Marine Nature Reserves (MNR). Area of Outstanding Natural Beauty (AONB). Refuge for species protected under the Wildlife (Northern Ireland) Order 1985 (as amended). Undesignated sites fulfilling the criteria for designation as an ASSI; NNR; MNR; and/or refuge for species protected under the Wildlife (Northern Ireland) Order 1985 (as amended). Resident or regularly occurring populations (important at the national level) of the following: Species protected under Wildlife (Northern Ireland) Order 1985 or Wildlife Act 1976, as amended); and/or Species listed on the relevant Red Data list. Sites containing 'viable areas' of the habitat types listed in Annex I of the Habitats Directive.
Regional	Sites of Local Nature Conservation Importance (SLNCI). Areas subject to a Tree Preservation Order. Resident or regularly occurring populations (assessed to be important at the Regional level) of the following: Species of bird, listed in Annex I and/or referred to in Article 4(2) of the Birds Directive; Species of animal and plants listed in Annex II and/or IV of the Habitats Directive; Species protected under the Wildlife (Northern Ireland) Order 1985 (as amended); and/or Species listed on the relevant Red Data list. Sites containing areas of the habitat types listed in Annex I of the Habitats Directive that do not satisfy the criteria for valuation as of International or National importance. Regionally important populations of species or viable areas of semi-natural habitats or natural heritage features identified in the National or Local Biodiversity Action Plan (BAP), if this have been prepared. Sites containing semi-natural habitat types with high biodiversity in a regional context and a high degree of naturalness, or populations of species that are uncommon within the region. Sites containing habitats and species that are rare or are undergoing a decline in quality or extent at a national level.

Ecological Value	Criteria
Local	Locally important populations of priority species or habitats or features of natural heritage importance identified in the Local BAP, if this has been prepared; Resident or regularly occurring populations (assessed to be important at the Local level) of the following: Species of bird, listed in Annex I and/or referred to in Article 4(2) of the Birds Directive; Species of animal and plants listed in Annex II and/or IV of the Habitats Directive; Species protected under the Wildlife (Northern Ireland) Order 1985 (as amended); and/or Species listed on the relevant Red Data list. Sites containing semi-natural habitat types with high biodiversity in a local context and a high degree of naturalness, or populations of species that are uncommon in the locality; Sites or features containing common or lower value habitats, including naturalised species that are nevertheless essential in maintaining links and ecological corridors between features of higher ecological value Sites containing small areas of semi-natural habitat that are of some local importance for wildlife; Sites or features containing non-native species that are of some importance in maintaining habitat links.

Ecological Impact Assessment must also consider the significance of effects that may be expected arising from a proposed development. CIEEM guidelines (2018) define a significant effect as:

"an effect that either supports or undermines biodiversity conservation objectives for 'important ecological features'... or for biodiversity in general. Conservation objectives may be specific (e.g. for a designated site) or broad (e.g. national/local nature conservation policy) or more wide-ranging (enhancement of biodiversity). Effects can be considered significant at a wide range of scales from international to local".

It also states that:

"an effect that is sufficiently important to require assessment and reporting so that the decision maker is adequately informed of the environmental consequences of permitting a project. A significant effect is a positive or negative ecological effect that should be given

weight in judging whether to authorise a project: it can influence whether permission is given or refused and, if given, whether the effect is important enough to warrant conditions, restrictions or further requirements such as monitoring".

The criteria for assessment of significance of effects is given in the following table. It should be noted that significant effects may also include beneficial effects.

Table 5: Criteria for Assessing Significance of Effects

Impact Significance		Criteria
Significant Negative Effect	**Major Adverse**	Loss of, permanent damage to or adverse impact on any part of a site of international or national importance; Loss of a substantial part or key feature of a site of regional importance; Loss of favourable conservation status (FCS) of a legally protected species; Loss of or moderate damage to a population of nationally rare or scarce species.
	Moderate Adverse	Temporary disturbance to a site of international or national importance, but no permanent damage; Loss of or permanent damage to any part of a site of regional importance; Loss of a key feature of local importance; A substantial reduction in the numbers of legally protected species such that there is no loss of FCS but the population is significantly more vulnerable; Reduction in the amount of habitat available for a nationally rare or scarce species, or species that are notable at a regional or county level.
No Significant Effect	**Minor Adverse**	Temporary disturbance to a site of regional value, but no permanent damage; Loss of, or permanent damage to, a feature with some ecological value in a local context but that has no nature conservation designation; A minor impact on legally protected species but no significant habitat loss or reduction in FCS; A minor impact on populations of nationally rare or scarce species or species that are notable at a regional or county level.

Impact Significance		Criteria
	Negligible	No impacts on sites of international, national or county importance; Temporary disturbance or damage to a small part of a feature of local importance; Loss of or damage to land of negligible nature conservation value; No reduction in the population of legally protected, nationally rare, nationally scarce or notable (regional level) species on the site or its immediate vicinity. Beneficial and adverse impacts balance such that resulting impact has no overall affect upon feature.
	Minor Beneficial	A small but clear and measurable gain in general wildlife interest, e.g. small-scale new habitats of wildlife value created where none existed before or where the new habitats exceeds in area that habitats lost.
Significant Positive Effect	**Moderate Beneficial**	Larger new scale habitats (e.g. net gains over 1 ha in area) created leading to significant measurable gains in relation to the objectives of biodiversity action plans.
	Major Beneficial	Major gains in new habitats (net gains of at least 10 ha) of high significance for biodiversity being those habitats, or habitats supporting viable species populations, of national or international importance cited in Annexes I and II of the habitats Directive or Annex I of the Birds Directive.

The duration of impact must also be considered when assessing overall ecological impacts. Criteria for assessment of duration of impacts uses (EPA 2002), the following terms are defined when quantifying duration:

- Temporary: up to 1 year
- Short-term: from 1-7 years
- Medium-term: 7-15 years
- Long-term: 15-60 years
- Permanent: over 60 years

The likelihood of impacts should also be defined. Assessment of likelihood of impact followed CIEEM guidelines. These assesses likelihood as follows:

- Almost Certain: probability estimated at greater than 95%
- Probable or Likely: probability estimated between 50% and 95%
- Unlikely: probability estimated between 5% and 50%
- Extremely Unlikely: probability estimated at less than 5%

In the case of the development being considered, most effects may be defined as likely as the area proposed for development is clearly defined.

The following section gives the evaluation of habitat areas encountered within the project. These are given per habitat type. A rationale for selection is also given.

7.2 Site Habitat Evaluation

The more valuable of these areas in terms of biodiversity are defined as Ecologically Sensitive Areas (ESAs). These are shown in the Maps.

Ecologically Sensitive Areas (ESA) have been identified in the following locations and are depicted on the accompanying habitat and constraints maps in Appendix A and as a table in Appendix B.

Table 6: Ecologically Sensitive Areas recorded within the survey area.

id	Habitat Type	Detail	Distance from Firhouse Inn
1	River Dodder	Part of this is Dodder Valley pNHA	180m
2	Treelines	Mature treelines of broadleaved trees. Bird nesting habitat and potential bat roost habitat.	Within 10m

3	Riparian Woodland	Woodland beside Dodder	>200m
4	Mixed Broadleaved Woodland	Within Dodder Valley Linear Park	c. 400m

It should be noted that no impacts are predicted on any of the Ecologically Sensitive Areas.

7.3 Ecological Impact Assessment

The potential impacts on the ecological features identified are given in the following table.

7.3.1 Impact Assessment

Table 7: Impact Assessment:

Ecological feature	Evaluation	Nature of Impact	Significance	Duration & Likelihood
Buildings and artificial surfaces	BL3	Loss of this habitat type	Negligible	Permanent/Likely
Treelines	WL2	None predicted	None	None
Improved agricultural grassland	GA1	None predicted	None	None
Amenity Grassland	GA2	None predicted	None	None
Mixed Broadleaved woodland	WD1	None predicted	None	None
Upland/Eroding River	FW1	None predicted	None	None
Scattered Trees & Parkland	WD5	None predicted	None	None
Scrub	WS1	None predicted	None	None
Mixed broadleaved/conifer woodland	WD2	None predicted	None	None
Riparian Woodland	WN5	None predicted	None	None

8 Mitigation of Impacts

8.1 Impact on Habitats

Impacts are only predicted on one habitat type. This is habitat loss of Built Areas and will be of *Permanent* duration. As there are no natural or semi-natural habitats or vegetation communities here, this impact is predicted as being of *Negligible* significance. No impacts on any other habitat types are predicted as likely.

Impacts on habitats within the Dodder Valley pNHA are not considered likely given the remove between the site proposed for development and the Dodder Valley, the lack of connectivity between the two sites and the absence of sensitive features of the Dodder Valley within the site proposed for development.

8.1.2 Habitat Impact Mitigation

No mitigation is required here as no significant habitat area will be impacted upon.

8.2 Impacts on Bats

8.2.1 Bats

All bat species are protected by law in Ireland under the Bonn Convention (1992), the Bern Convention (1982) the EU 'Habitats' Directive (92/43/EC; transposed into Irish law by S.I. No. 94 of 1997) and the Wildlife Acts 1976 and 2000. Lesser Horseshoe Bats are listed as Annex II species of the Habitats Directive (afforded special protection). All other Irish bat species are listed in Annex IV (general protection) of this Directive.

Numerous surveys of all potential bat roosting habitats were undertaken. Such habitat areas include the existing buildings and the mature trees near the site. The majority of Irish bat species are known to use linear semi-natural landscape features like rivers and hedgerows for feeding and navigation particularly in areas of intensive agriculture. As such the Dodder Valley is an important area for local bat populations. The bat surveys

(reported separately) found that while there was no evidence of bat habitation within the Firhouse Inn buildings, some of these buildings would offer suitable habitat for bat species and that some areas of these buildings were accessible. It was noted also that the mature trees immediately adjacent the site proposed for development could also provide roosting habitat for bats. However, later surveys (August 2021, May 2022) found no potential roost features in these trees and a further survey undertaken in July 2023 found no evidence of bat habitation within these trees or any of the structures on the site.

8.2.2 Impacts Upon Bats

The proposed development may be predicted as having some possible *minor adverse* impact upon bat populations. Of greatest significance is the loss of potential roost habitat when the existing Firhouse Inn buildings are removed. As noted in the accompanying bat survey, that while no bat roosts were found on the most recent survey, there is a possibility that roosts will occur here in the future. Preconstruction surveys carried out by appropriately qualified specialists should be conducted before any works at this site. Correctly carried out, direct impacts from construction works should therefore be *Negligible.*

The lighting scheme of the proposed development may have a significant impact on bats. Lighting can severely impact on bat roosting behaviour, foraging behaviour and commuting behaviour with knock-on effects on accessing feeding areas. Many species of bats forage along dark corridors like rivers and hedgerows and are known to stay clear of well-lit areas. If the development is inappropriately lit, this can impact upon bats' home ranges. Bat vision is an important sense during dusk and dawn as bats begin to move to and from the roosting sites. Excessive luminance particularly around roosting sites can lead to bats being disorientated and can also lead to abandonment of roosts. Lighting can also impact feeding behaviour as prey species are drawn towards lights leading to a localised decrease in prey populations as most bat species will avoid well-lit areas.

8.2.3 Mitigation of Impacts upon Bat Populations

The recommendations as given in the accompanying bat reports are to be followed. Namely, prior to works commencing, emergence (dusk) and re-entry (dawn) watches should be undertaken to ensure no bats are present. These should be carried out during the appropriate season, May to September. If bats are not confirmed exiting or entering the buildings, a further internal survey is required before demolition works involving roofs can commence, under the supervision of an ecologist. During the period October to April inclusive, a pre-works internal survey is required, and demolition works involving the roofs supervised by an ecologist.

If bats are confirmed, works cannot proceed until an NPWS derogation licence is obtained.

It is recommended that an ecologist has input into the external lighting plan for the future development to ensure the correct positioning and models of lighting columns are installed and the mature treeline habitats around the development are not impacted by light overspill.

Lights should face down or be masked to avoid light hitting potential roosting areas in the adjacent trees. Internal and external louvres may be used to reduce light spillage.

8.3 Impacts on Mammals

No evidence of the activity of any protected mammal species was found during survey. The National Biodiversity Data Centre database shows records of 8 no. terrestrial mammal species of which 5 no. are protected. These species are Otter (*Lutra lutra*), Badger (*Meles meles*), West European Hedgehog (*Erinaceous europaeus*), Pygmy Shrew (*Sorex minutus*) And Eurasian Red Squirrel (*Sciurus vulgaris*). However, no impacts are predicted on any of these as:

- No suitable habitat for these species occurs here or will be lost.
- No direct impacts are foreseeable as no protected species utilise the site proposed for development.
- The operational phase of the proposed project (the occupied buildings) will not have any impacts on these species.

The non-protected mammal species recorded in the relevant tetrad are: Red Fox (*Vulpes vulpes*), American Mink (*Mustela vison*) and Eastern Grey Squirrel (*Sciurus carolinensis*).

8.3.1 Mammal Impact Mitigation

No mitigation is deemed necessary as no impacts are expected on any protected mammal species.

8.4 Impacts on Birds

No evidence of any bird nesting activity was found during site surveys. No bird nesting habitat such as trees, shrubs or scrub occurs within the site proposed for development. However, the existing buildings could potentially offer nesting habitat to a number of bird species such as House Martin (*Delchicon urbicon*) or Swallow (*Hirundo rustica*). These migratory species make use of accessible building space such as open or broken windows and open roof space. Construction activity could cause injury or death to birds that are nesting at this site. These birds are protected by law. It should be noted that no bird species have been recorded utilising the site.

The Birds Directive (2009/147/EC) and the Habitats Directive (92/43/EEC) provide legal protection for all bird species, selected habitats and the wider environment in the EU. The Wildlife Act 1976 (Revised, Updated to 20 December 2018) infers in Section 22, (5), that it is an offence for a person to intentionally kill or to injure a protected wild bird or to intentionally to destroy, injure or mutilate the eggs or nest of a protected wild bird.

8.4.1 Bird Impact Mitigation

In order to avoid any impacts to bird species, it is recommended that the buildings are made secure following the bird nesting season (March-August inclusive). This is in order to prevent birds carrying out nesting activity at this site. If works are to take place within the bird nesting season, it is also recommended that a preconstruction survey is carried out by an appropriately qualified ecologist. This is in order to ensure that no bird nesting has taken place since the last survey (July 2022).

8.5 Impacts on Other Habitats or Species

No impacts are predicted on any other habitats or species / groups (e.g. invertebrates, reptiles, amphibians). This is primarily due to the lack of any suitable habitat for these species/groups within the site proposed for development. No further mitigation is therefore required.

8.6 Invasive Species

Sycamore and *Buddleja davidii* are classified as non-native invasive species of Medium Impact risk. However, it is not considered that either species will impact on the project. No impacts are predicted as a result of other invasive species (e.g. Knotweeds) at this site as none were recorded here. It is highly unlikely that any other invasive species will become established here prior to the development of the site. No mitigation istherefore required.

9 Conclusion

Ecological surveys were carried out at the site proposed for development at Firhouse. These were completed within suitable time for habitat and other assessment of the site and adjacent areas. Surveys included mammal, bird, bat habitat and invasive species. An extensive desktop survey was carried out which used available data from suitable sources which included online databases (e.g. National Parks and Wildlife Service and National Biodiversity Data Centre) and previous surveys (e.g. for the Dodder Greenway).

A very limited range habitats was recorded during survey. The site proposed for development contains only built habitat areas, a highly modified site. Surveys of the adjacent areas found No habitats listed on Annex I of the EU Habitats Directive were found within the survey area. No plants subject to the Flora Protection Order (2015) were found to occur within the area surveyed.

Four areas surveyed were described in the habitat survey as Environmentally Sensitive Areas (ESAs), being of greater sensitivity due to the habitats or species occurring here. These included the River Dodder and mixed broadleaved woodland within the river valley. No impacts on these ESAs may reasonably be predicted.

No protected mammal species were found to occur within the area proposed for development. It was noted that suitable habitat for some protected mammal species occurs within the ESAs as described above and that 5 no. protected mammal species have been recorded within 2km of the proposed development site. However, there is no suitable habitat for these species here.

A dedicated survey of at the existing buildings found no evidence of bat habitation. However, the same survey showed that there is suitable habitat here for bat roosts. A further preconstruction bat survey immediately prior to development is therefore recommended.

No bird species were recorded as nesting in the existing built habitat at the site. No negative impacts on bird species are therefore predicted. However, it is recommended that a further bird survey is carried out of the buildings immediately prior to development as bird nesting may take place here in the interim period.

A targeted survey for invasive species was carried out. No invasive species of anything higher than *medium* impact were found at the site proposed for development. No significant effects are expected to arise from the presence of these.

An evaluation of habitats showed that the site proposed for development is of Low Local value. The significance of impacts here may be described as being of *negligible* significance. In terms of habitat evaluation, the Dodder Valley pNHA was the only site within the survey area being of *national* importance. No potential impacts to this designated site were predicted given the location and nature of works. Indeed no other significant effects are predicted for any other habitat type within the survey area.

It is recommended that the above mitigation measures are fully implemented in order to minimise any potential for ecological impacts.

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Appendix A: Area Under Survey

Fig. i. Area under survey shown. Blue lines indicate watercourses. River Dodder shown. Area proposed for development shown in red outline.

Base mapping from Environmental Protection Agency gis.epa.ie

Appendix B: Site and Dodder Valley pNHA

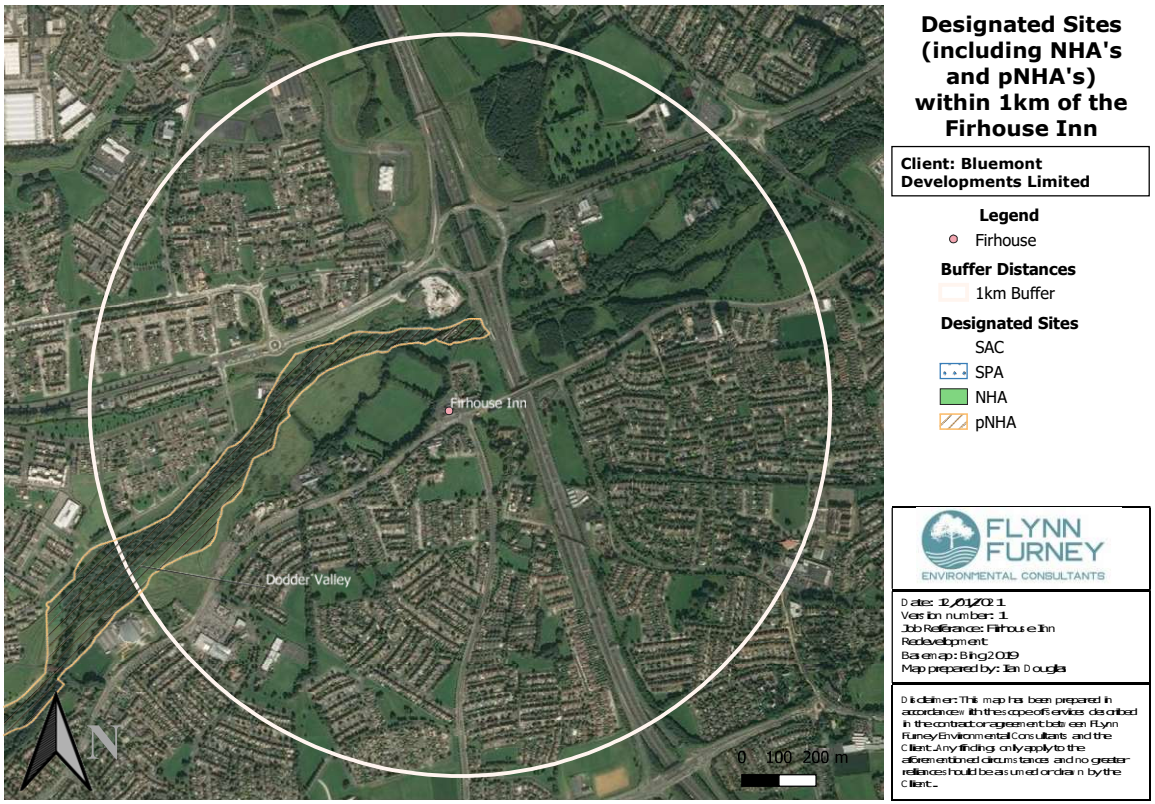
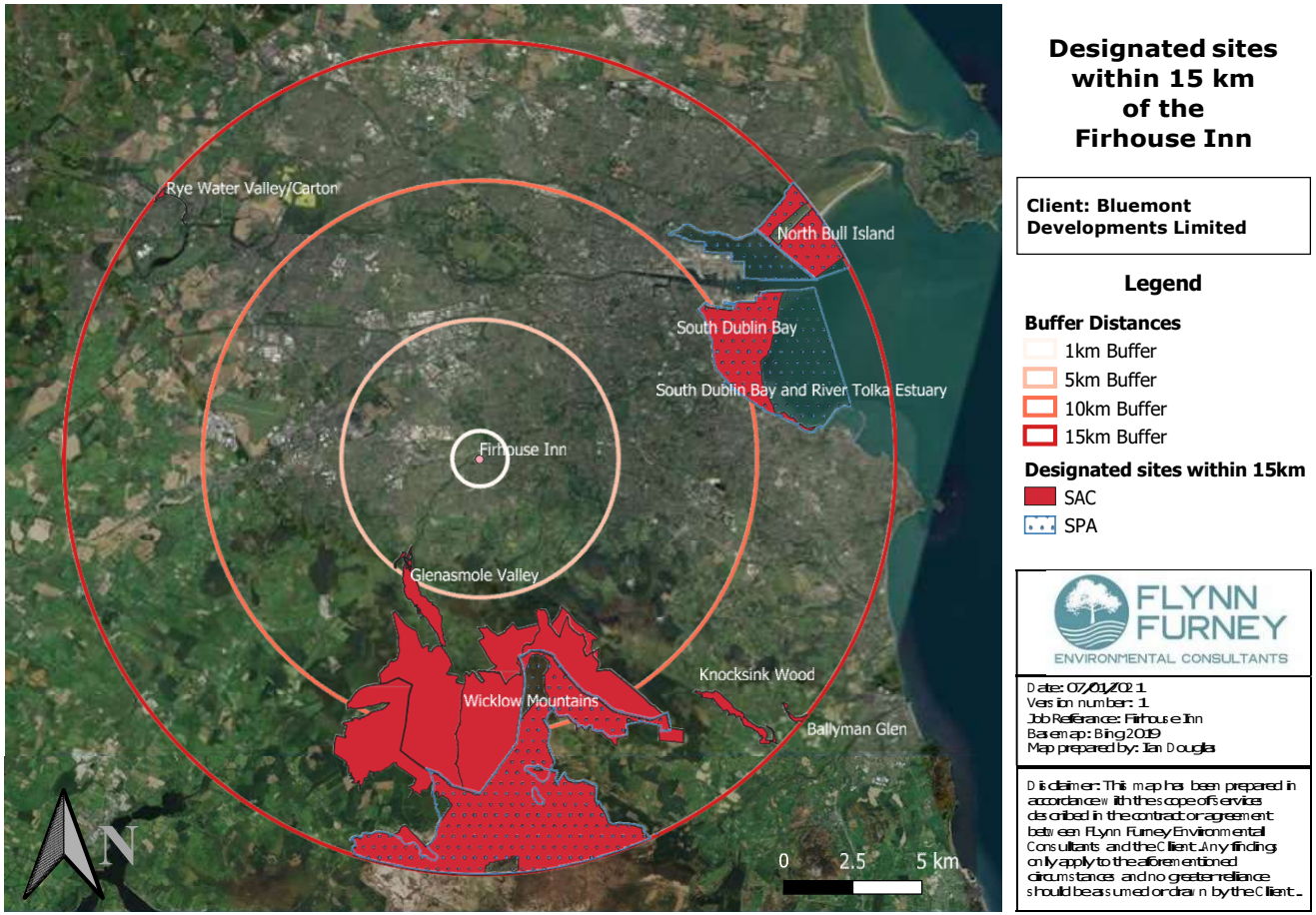


Fig. ii. Site and Dodder Valley proposed Natural Heritage Area shown. White line indicates 1km radius from Firhouse Inn.

Appendix B. (2) Protected Sites within 15km of Site



Appendix B.(3) Habitats within Survey Area

Habitats sourounding Firhouse Inn

Client: Bluemont Developments Limited

Legend

Site Boundary

Firhouse Inn and Car Park

Habitats

Buildings and artificial surfaces
(Mixed) broadleaved woodland
Amenity grassland
Eroding/upland rivers
Hedgerows
Improved agricultural grassland
Scrub
Treelines

FLYNN FURNEY
ENVIRONMENTAL CONSULTANTS

Date: 12/01/2021
Version number: 1
Job Reference: Firhouse Inn Redevelopment
Base map: Bing 2019
Map prepared by: Ian Douglas

Disclaimer: This map has been prepared in accordance with the scope of services described in the contract or agreement between Flynn Furney Environmental Consultants and the Client. Any finding, only apply to the aforementioned circumstances and no greater reliances should be assumed or drawn by the Client..

Appendix C: Some Photographs of Site

Fig. 1 View of Firhouse Inn: eastern elevation.

Fig. 2 Boundary wall of Inn car park with mature broadleaved trees shown.

Fig. 3 Agricultural grasslands to northwest of Firhouse Inn with mature treelines shown.

Fig. 4 River Dodder to north of site shown with amenity grassland (left) and mixed broadleaved woodland (right) shown.

Fig. 5 Mature beech trees to north of site. These are part of an important habitat area.

Fig. 6 Junction adjacent to Firhouse Inn with trees and some scrub shown.

Fig. 7 Looking to the east (toward M50) with Firhouse Inn on left hand side.

No. 2 Firhouse Road and the former 'Morton's The Firhouse Inn', Firhouse Road, Dublin 24: Invasive Species Survey Report

FLYNN FURNEY
ENVIRONMENTAL CONSULTANTS

For: Bluemont Developments (Firhouse) Limited
By: Billy Flynn
Date: 11 Oct. 23

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1. INTRODUCTION

Flynn Furney Environmental Consultants were commissioned by Bluemont Developments (Firhouse) Limited to undertake an invasive species assessment at No. 2 Firhouse Road and the former 'Morton's The Firhouse Inn', Firhouse Road, Dublin 24. Assessments were to determine if legally controlled invasive species subject to restrictions under Regulations 49 and 50 of the EC Birds and Natural Habitats Regulations (Irish statutory instrument 477/2011) were present. A site walkover was carried out by Environmental Consultants on the 28th of July, 2023.

Fig. 1 Area under survey at former Firhouse Inn and No. 2 Firhouse Road site.

2. METHOD

The entire premises and curtilage of the site proposed for development, as in Figure 1 was walked and surveyed as per guidelines given by CIEEM (2019). The location of stands of Japanese knotweed (*Fallopia japonica)* and other High Impact invasive species (as listed by Invasive Species Ireland) was a priority during the survey. Open windows and gaps allowed sufficient assessment of flora in areas suitable for vegetation growth.

3. RESULTS

No species listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations, 2011 (S.I. No. 477 of 2011), were found within the boundary. As previously found, *Buddleja davidii*, an invasive species with a Medium Impact risk, was noted in abundance. Mature Sycamore (*Acer pseudoplatanus*) is another Medium Impact risk species which occurs in the treeline immediately adjacent the site.

4. CONCLUSION

No species listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations, 2011 (S.I. No. 477 of 2011), were found within the boundary. No other High Impact invasive species were recorded.

Buddleja davidii, also known as Butterfly Bush, is a large deciduous shrub that can grow up to 300 cm tall. It is able to survive in poor soil and disturbed ground, colonizing new roads, urban sites, railways, as well as eskers and rock outcrops. It can create obstructions, and where it grows near waterways it can lead to erosion problems due to its shallow roots. It can also outcompete native vegetation.
Control of *Buddleja davidii* is quite straightforward. It may simply be grubbed up during dry periods and the cut material may be mulched and disposed of as per any cut woody material. Herbicide such as Glyphosate or Triclopyr may be applied to leaves or cut stems to kill plants in-situ. As the other invasive species occurring here (Sycamore) occurs outside the site, no action on this species is recommended.

Whilst no legally controlled invasive species were identified on site, biosecurity measures to prevent potential infestation should be strictly adhered to. Possible pathways of introduction of invasive species onto the site include machinery and importation of contaminated topsoil. All machinery, particularly tracked machinery, should be sufficiently checked and cleaned prior to entering the site. If topsoil is being imported into the site at any stage during construction or landscaping, the soil needs to be certified as having been treated for invasive species and / or the source of the topsoil needs to be confirmed as being invasive species free.

Appendix A. Some Photographs of Site

Fig. 1 Dandelion and other non-invasive species growing to rear of site.

Fig. 2 *Buddleja davidii*, a non-listed invasive species recorded in the former beer garden.

Fig. 3 Buddleia (to rear of photograph) and a number of other non-invasive species including Tutsan.

Fig. 4. Nettles and other non-invasive species among discarded materials to the rear of the site.

ENVIRONMENTAL IMPACT ASSESSMENT SCREENING REPORT FOR A PROPOSED LARGESCALE RESIDENTIAL DEVELOPMENT ON A SITE AT FIRHOUSE, CO. DUBLIN

Report Prepared For

Bluemont Developments (Firhouse) Limited

Report Prepared By

David Doran
Senior Environmental Consultant

Our Reference

DD/247501.0001ES01

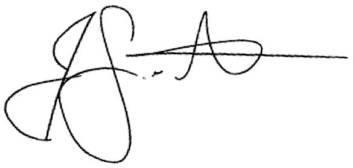
Date of Issue

25 January 2024

Document History

Document Reference		Original Issue Date	
DD/247501.0001ES01		25 January 2024	
Revision Level	Revision Date	Description	Sections Affected

Record of Approval

Details	Written by	Approved by
Signature		
Name	David Doran	Jonathan Gauntlett
Title	Senior Environmental Consultant	Principal Environmental Consultant
Date	25 January 2024	25 January 2024

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1.0 INTRODUCTION

On behalf of Bluemont Developments (Firhouse) Limited ('the Applicant'), AWN Consulting Limited ('AWN') has prepared the following Environmental Impact Assessment (EIA) Screening Report for a Large-Scale Residential Development (LRD) Application located at No. 2 Firhouse Road and the former 'Morton's, The Firhouse Inn' Firhouse Road, Firhouse , Dublin 24, and is 0.46 hectares.

The proposal comprises the demolition of the existing and two-storey buildings (c. 1,326sq m) and the construction of 2 no. blocks (Blocks 01 and 02) ranging in height from three to four storeys, comprising 100 no. residential over crèche and commercial ground floor uses, all over 2 no. basement level.

The indicative site is outlined in red on Figure 1.1 (hereafter referred to as 'the site'). The development is described in further detail in Section 2 below.

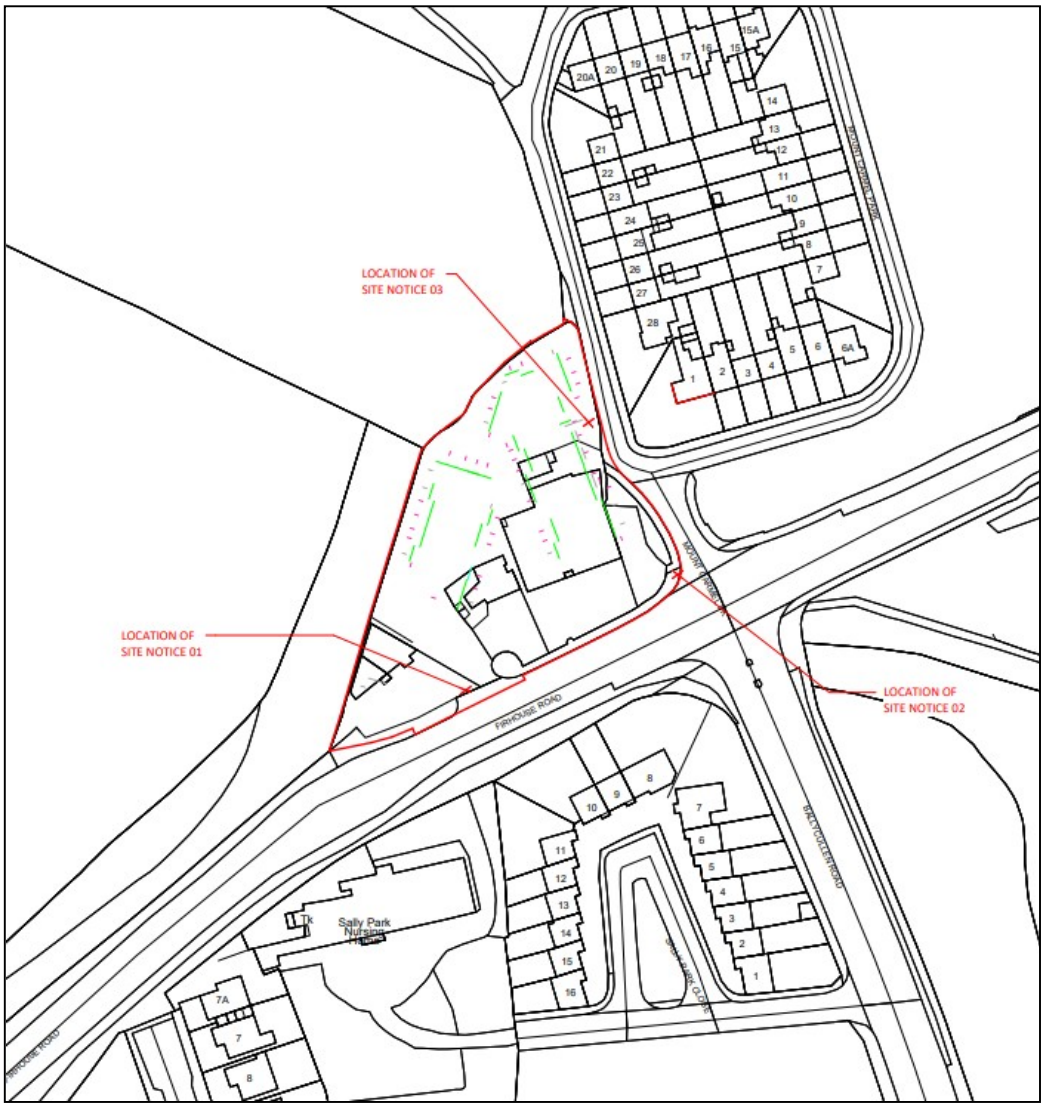

Figure 1.1 Proposed development Site Location (indicative in red) (Source: Extract from 20022A-OMP-00-SX-DR-A-1000)

The purpose of this report is twofold, firstly to provide the Competent Authority (South Dublin County Council (SDCC)) with the information required under Schedule 7A to demonstrate there are no likely effects on the environment, having regard to the criteria set out in Schedule 7 of the Planning and Development Regulations 2001, as amended. This information will enable SDCC to undertake a screening determination in respect of the need for an Environmental Impact Assessment Report ('EIAR') for the proposed development. The second reason for this report is to document the studies undertaken by the Applicant, and the design team, which demonstrate there are no likely significant effects as a result of the proposed development and the application can be determined by SDCC without an EIAR having been submitted.

There is a mandatory requirement for an EIAR to accompany a planning application for some types of development that meet or exceed the "thresholds" specified in Schedule 5 to the Planning and Development Regulations. In addition to the mandatory requirement, there is a case-by-case assessment necessary for sub-threshold developments as they may be likely to have significant effects on the environment. If a sub-threshold development is determined to be likely to have significant effect on the environment, then an EIAR will be required.

The proposed development and component parts have been considered, as documented in Section 2, against the thresholds for EIA as outlined in of the Planning and Development Regulations 2001 (as amended). The proposed development is a sub-threshold development and is not mandatory for EIA.

AWN, along with the project team, have undertaken an assessment of the effects on the environment from the proposed development and has concluded that there are no likely significant environmental effects which would warrant preparation of an EIAR. The assessment is documented in Section 3.0, 4.0 and 5.0 and covers each aspect of the environment in accordance with guidance including; Population and Human Health; Biodiversity; Land, Soils, Geology, Hydrogeology, and Hydrology; Air Quality and Climate; Noise and Vibration; Landscape and Visual Impact; Cultural Heritage, and Archaeology; Traffic and Transportation; Material Assets, and Waste.

1.1 EIA SCREENING LEGISLATION AND GUIDANCE

The legislation and guidance listed below has informed this report and the method to EIA Screening:

- Guidelines on the Information to be contained in Environmental Impact Assessment Reports. Environmental Protection Agency (2022).
- Environmental Impact Assessment Screening, OPR Practice Note PN02 (Office of the Planning Regulator, 2021).
- European Union (Planning & Development) (Environmental Impact Assessment) Regulations 2018.
- Environmental Impact Assessment of Projects – Guidance on Screening. (2017). European Commission.
- Environmental Impact Assessment of Projects - Guidance on the preparation of the Environmental Impact Assessment Report. (2017) European Commission.
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment. (August 2018). Department of Housing, Planning and Local Government.
- Interpretation of definitions of project categories of Annex I and II of the EIA Directive. (2015) European Commission.

- European Union Environmental Impact Assessment (EIA) Directive 2011/92/EU as amended by 2014/52/EU.
- Planning and Development Act, 2000 (as amended).
- Planning and Development (Housing) and Residential Tenancies Act 2016
- Planning and Development Regulations 2001 (as amended).

The screening process followed in this report is in accordance with the EIA Directive 2011/92/EU of the European Parliament and of the Council as amended by 2014/52/EU and follows the format as per Section 3.2 of the EPA Guidelines (2022). The potential for significant effects of the proposed Project has been considered against Schedule 7 of the *Planning and Development Regulations, 2001 as amended.*

1.2 SCREENING METHODOLOGY

The screening process followed in this report is in accordance with the EIA Directive 2011/92/EU of the European Parliament and of the Council as amended by 2014/52/EU and follows the format as per Section 3.2 of the EPA Guidelines (2022).

The key steps to screen for an EIA is set out in Section 3.2 of the EPA Guidelines are as follows:

1. Is the development a type that that requires EIA?
2. Is it of a type that requires mandatory EIA?
3. Is it above the specified threshold?
4. Is it a type of project that could lead to effects? and/or
5. Is it a sensitive location? and/or
6. Could the effects be significant?

The information required to be submitted by the developer for the Planning Authority to make a determination on EIA Screening is set out in Schedule 7A of the Regulations of 2001 (see also Annex IIA of the EIA Directive).

However, it is important to note that Schedule 7A states '*The compilation of the information at paragraphs 1 to 3* [of Schedule 7A] *shall take into account, where relevant, the criteria set out in Schedule 7*.' Having regard to this for the purposes of compiling the relevant information on the likely effects of the proposed development and in order to address points 4 to 6 above, an evaluation of the characteristics of the project, the sensitivity of the location of the proposed development, and the potential for significant impacts has been made with regard to Schedule 7 of the Regulations.

Schedule 7 of the Regulations of 2001 sets out the criteria for the Planning Authority to determine whether a development would or would not be likely to have significant effects on the environment. The criteria is broadly set out under the three main headings:

1) *Characteristics of proposed development* (Report Section 3.0)
   - *a. the size and design of the whole of the proposed development,*
   - *b. 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 proposed development* (Report Section 4.0)
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, 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.

3) *Types and Characteristics of Potential Impacts* (Report Section 5.0)

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, geographical area and size of the population likely to be affected),
b. the nature of the impact,
c. the transboundary 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.

However, it is important to note that Schedule 7A states '*The compilation of the information at paragraphs 1 to 3 [*of Schedule 7A*] shall take into account, where relevant, the criteria set out in Schedule 7*.' The main body of this report (Sections 3.0, 4.0 and 5.0) will cover Schedule 7A fully, but it has been set out to present the

information under the headings provided for in Schedule 7 in order to assist the Planning Authority in its screening assessment.

1.3 PROJECT TEAM AND CONTRIBUTORS TO THE EIA SCREENING REPORT

This EIA Screening Report and the proposed development has been informed by the accompanying documents submitted with the application (and the relevant listed mitigation measures as included therein). The preparation and co-ordination of this screening report has been completed by AWN and has relied on specialist input from the project design team and applicant, as per Table 1.1.

Table 1.1 *Applicants project team*

Role	Contributor
Applicant	Bluemont Developments (Firhouse) Ltd.
Architectural Design	O'Mahony Pike Architecture Urban Design
Civil Engineering including Flood Risk Assessment, Construction and Environmental Management Plan, Construction Waste Management Plan	PHM Consulting
Landscape Architecture	Studio Aula
Visual Impact Assessment	Doyle + O'Troithigh Landscape Architecture
Photomontages	Digital Dimensions
Population and Human Health; Land Soils, Geology, Hydrogeology, and Hydrology; Air Quality and Climate; Material Assets; Waste Management; Noise and Vibration (construction)	AWN Consulting Limited
Biodiversity, including Appropriate Assessment Screening	Flynn Furney Environmental Consultants

The various reports address a variety of environmental issues and assess the impact of the proposed development and demonstrate that subject to the various construction and design related mitigation measures recommended that the proposed development will not have a significant impact on the environment. This EIA Screening Report should be read in conjunction with the plans and particulars submitted with the planning application.

Best practice mitigation measures for the proposed development during the construction and operational phase are set out in various reports including but not limited to the Construction and Environmental Management Plan (CEMP) and Construction Waste Management Plan (CWMP), both prepared by PHM Consulting; and the Ecological Impact Assessment (EcIA) that has been prepared by Flynn Furney Environmental Consultants. Measures associated with the construction phase are best practice measures and are in no way included to avoid or reduce any potential harmful effects to any European sites.

Each environmental specialist of the applicants project team was commissioned having regard to their previous experience in EIA; their knowledge of relevant environmental legislation relevant to their topic; familiarity with the relevant standards and criteria for evaluation relevant to their topic; ability to interpret the specialised documentation of the construction sector and to understand and anticipate how their topic will be affected during construction and operation phases of development; ability

to arrive at practicable and reliable measure to mitigate or avoid adverse environmental impacts; and to clearly and comprehensively present their findings.

This EIA Screening report was prepared by David Doran and Jonathan Gauntlett. David is a Senior Environmental Consultant with AWN Consulting. David has a MSc in Environmental and Energy Management (Hons). Recent projects include; project management of commercial and infrastructural EIARs, EIA Screening Reports, various EIAR Chapters, Operational and Resource Waste Management Plans for residential developments, office developments, logistics park developments and other, commercial, and industrial developments. David also works in the area of construction environmental compliance. Jonathan is a Principal Environmental Consultant in AWN Consulting with expertise in impact assessment, licensing, environmental compliance and project management. Recent projects include; EIA for SHD and planning applications, EPA Licencing and waste management. Jonathan has over 10 years' experience in environmental compliance, environmental licensing, and urban planning. Jonathan has a BSocSc (Environmental Planning) and BBA (Economics) from the Waikato University in New Zealand and has experience working in the environmental consultancy, planning, and regulatory fields from Ireland, the UK and New Zealand.

2.0 SCREENING EVALUATION

Schedule 5 of the Planning & Development Regulations 2001, as amended, sets out a number of classes and scales of development that require EIA. In considering the wider context and the component parts of the project the proposed development the thresholds of relevance to the proposal from Part 2 of Schedule 5 are set out in Table **2.1** below.

Table 2.1 *Relevant Part 1 Schedule 5 Thresholds for EIA and determination of requirement of EIA*

Development for the Purposes of:	Related Development Details	Exceeds Threshold?
10. Infrastructure projects - *(b)(i) Construction of more than 500 dwelling units*	The development will consist of 100 dwelling units which is below the threshold of 500 dwelling.	No
10. Infrastructure projects - *(b) (iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.*	The proposed development is deemed to be conservatively located within 'other parts of a built-up area' and hence 10 hectares is the applicable threshold. The proposed development site is 0.46 hectares which is below the stated threshold.	No.
15. Any project listed in this Part which does not exceed a quantity, area or other limit specified in this Part in respect of the relevant class of development, but which would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.	The following Sections 3.0, 4.0 and 5.0 of this report will provide information on the characteristics of the proposed development; in order to provide information on the likelihood of the project to have significant effects on the environment from these works, having regard to the criteria set out in Schedule 7	Determined by this EIA Screening Report.

2.1 CONCLUSION – SUB THRESHOLD DEVELOPMENT

The proposed development is '*of a type set out in Part 2 of Schedule 5 [in the Planning and Development Regulations, 2001 (as amended)] which does not equal or exceed, as the case may be, a quantity, area or other limit specified in that Schedule in respect of the relevant class of development*'. The development is outside the mandatory requirements for EIA and is considered to be sub-threshold for the relevant project type.

An EIA Report is still required to accompany a planning application for sub-threshold development which would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7. Therefore, the final step in the screening process is to consider the need for an EIA on a sub-threshold basis.

Article 4(4) of Directive 2014/52/EU requires the developer to provide information on the characteristics of the project and its likely significant effects on the environment, to allow the competent authorities to make a determination on the requirement for an EIA. The information required is set out in Annex II A of the Directive and transposed Schedule 7A of the Regulations.

The remainder of this report presents the information required by Schedule 7A to demonstrate the likely effects on the environment, having regard to the criteria set out in Schedule 7.

The following Sections 3.0, 4.0 and 5.0 will provide information on the characteristics of the proposed development; the location and context, and its likely impact on the environment. These sub sections also include a description of any features, if any, of the proposed development and the measures, if any, envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment of the development.

These sections present the information required under Schedule 7A of the Regulations, broadly set out in the structure Schedule 7 to ensure that each aspect for consideration is robustly addressed.

3.0 CHARACTERISTICS OF PROPOSED DEVELOPMENT

This section addresses the characteristics of proposed development by describing the physical characteristics of the whole proposed development and, where relevant, of demolition works; and a description of the location of the proposed development, with regard to the environmental sensitivity of geographical areas likely to be affected.

3.1 SIZE AND DESIGN OF THE PROPOSED DEVELOPMENT

The proposed development seeks to provide for the demolition of all existing structures on site, including the 2-storey building formally used as public house ancillary off-licence and associated structures on the east of the site; a 2-storey building comprising an existing barber shop and betting office to the west of the site; single-storey cottage building and associated structures in the centre of the site; and gated entrance from Mount Carmel Park.

The proposal includes the construction of 100 no. residential units within 2 no. blocks ranging in height from 3- 5-storeys (over lower ground floor and basement level) comprising; 96 no. apartments, (providing 3 no. studio units, 45 no. 1-bedroom units, 9 no. 2-bedroom (3-person) units, 36 no. 2-bedroom (4-person) units, and 3 no. 3-bedroom units); and 4 no. duplex units (providing 2 no. 1-bedroom units and 2 no. 2-bedroom (4-person) units). The apartment blocks will consist of the following:

- Block 01 – 5-storey apartment block (3-storeys rising to 5-storey over basement levels) comprising 48 no. apartment units as follows: 2 no. studio units, 22 no. 1-bedroom units, and 20 no. 2-bedroom apartments units, along with 4 no. duplex units comprising 2 no. 1-bedroom units and 2 no. 2-bedroom duplex

units. Each unit will have its own private open space in the form of a private balcony or terraced area.

- Block 02 – 5-storey apartment block (over basement levels) comprising 52 no. apartment units as follows: 1 no. studio unit, 23 no. 1-bedroom units, and 25 no. 2-bedroom units, and 3 no. 3-bedroom units. Each unit will have its own private open space in the form of a private balcony or terraced area.

The development will also provide for 355 sq. m. of non-residential/commercial development as follows:

- 1 no. café and 1 no. office located at ground floor level of Block 01 fronting onto Firhouse Road;
- 1 no. creche and associated play area to the rear of Block 01;
- 1 no. barbershop at ground floor level located between Block 01 and Block 02 fronting Firhouse Road;
- 1 no. bookmaker and 1 no. medical consultancy at ground floor level of Block 02, fronting onto Firhouse Road.

The proposed development will provide for 80 no. car parking spaces including accessible parking and Electric Vehicle parking across basement and lower ground floor levels; set down area; 270 no. bicycle parking spaces; 8 no. motorbike parking spaces; landscaping, including communal open space and public open space and children's play spaces; SuDS measures; boundary treatment; public lighting; ESB substation; plant and waste storage areas; associated signage details; all associated site and infrastructure works necessary to facilitate the development, including the relocation of existing watermain and surface water sewer on the site; vehicular access to the development will be via the exiting access off the Firhouse Road, with 1 no. pedestrian and cyclist access from Firhouse Road and 1no. pedestrian and cyclist access from Mount Carmel Park.

The site layout for the proposed development is shown in Figure 3.1 below.

Figure 3.1 *Proposed Site Layout Plan (Source: Proposed Site Layout Plan 20022A-OMP-00-SP-DR-A-1000)*

3.2 CUMULATION WITH OTHER EXISTING OR PERMITTED DEVELOPMENT

This section outlines the potential cumulation with other existing or permitted development. As part of the assessment of the impact of the proposed development, account has been taken of any relevant developments that are currently permitted, or under construction and substantial projects for which planning has been submitted within the surrounding areas, as well as existing local land uses.

The subject site is located in an urban area zoned for uses including residential development as proposed, in close proximity to good public transport links.

The subject lands, as shown in Figure 3.2, are zoned in the South Dublin County Development Plan 2022-2028 as '*Objective LC*' *"To protect, improve and provide for the future development of Local Centres".* Residential use is a 'Permitted in Principle' use under the '*Objective LC*' land use zoning.

Figure 3.2 Site Zoning (indicative proposed development site outlined in red; - Source: South Dublin County Council Development Plan 2022-2028 Map 9)

The identification of relevant, currently permitted, and future developments follows a two-fold approach. Firstly, a comprehensive search is undertaken to identify all developments within the vicinity of the proposed development site. Subsequently, a review of the magnitude, size, scale, location and current status of these developments is undertaken to assess their potential to contribute to significant cumulative effects. This secondary stage is conducted in alignment with the 2017 Guidance from the European Union (EU), which underscores the necessity to focus on effects that are either inherently significant or possess the potential for significance. This comprehensive review is crucial in the context of assessing the potential cumulative effects of a proposed project. It aids in gauging the extent to which these existing and future undertakings might, interact with the proposed development, and allow for the exclusion of insignificant developments from any further consideration. This strategic approach ensures that resources are not expended on negligible or inconsequential effects.

The initial stage of this process is facilitated through the utilisation of a planning search tools listed below which collectively hold a comprehensive inventory of planning applications, which systematically generated a comprehensive list of relevant planning

permissions granted within the immediate environs of the proposed development. A combination of online mapping tools was used for this search including:

- The Department of Housing, Local Government and Heritage[1]
- An Bord Pleanála Map Search[2]
- My Plan National Planning Application Map Viewer[3]
- South Dublin County Council Planning Map Viewer[4]

Due to the urban industrial character of the proposed development location, there are substantial industrial operations, noteworthy developments, and projects requiring EIA within the designated study area. The review of the online planning tool noted a large number of insignificant small extensions, changes of use, retention and other minor alterations in the vicinity of the proposed development. These proposed and consented developments have been, where relevant, considered as a part of the overall project impact. These permissions were for established residential properties and businesses within the vicinity of the development. In addition, the search encompassed a number of new one-off dwellings. The outcome of this search and review is detailed in Appendix A to this report.

3.3 NATURE OF ANY ASSOCIATED DEMOLITION WORKS

The proposed development includes the demolition of all existing structures on site which includes the Firhouse Inn building and outbuildings which is an old building constructed with solid stone masonry walls with timber floors and a slate over timber structure roof. The second building which is the barber/betting office is a newer building constructed of concrete masonry walls and concrete floors with slate roof over timber structure. The total gross floor area of the buildings to be demolished is 1325.5 m^2.

The open area of the site is of a tarmacadam finished carpark over granular sub-base material.

All areas designated for demolition are shown on the demolition drawings as included with the application and prepared by the project architects, O'Mahony Pike.

The existing structures on site will be demolished as an enabling works contract prior to the construction of the proposed development. As the existing buildings were constructed and in use over a period when asbestos was widely used in buildings, a detailed demolition asbestos survey will be carried out prior to the commencement of demolition works.

The Construction Environmental Management Plan (CEMP) and Construction Waste Management Plan, both prepared by PHM Consulting, and included with the application documentation provide details on the disposal of rubble, natural slate, timber, masonry, fibre cement slate, steel and concrete in further detail. The estimates on the generation of waste from the demolition works are set out in Section 3.5 below.

3.4 USE OF NATURAL RESOURCES (LAND, SOIL, WATER, BIODIVERSITY)

This section describes the proposed development in terms of the use of natural resources, in particular land, soil, water, biodiversity. In the overall context of Dublin,

[1] https://www.gov.ie/en/publication/9f9e7-eia-portal/
[2] https://www.pleanala.ie/en-ie/Map-search
[3] https://www.myplan.ie/national-planning-application-map-viewer/
[4] https://www.westmeathcoco.ie/en/ourservices/planning/searchapplications/

the proposed development there will not be a significant consumption of natural resources during construction and operation.

The main use of natural resources will be land, soil and water. 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.

Land and Soil

The proposed land use is acceptable within the context of the existing and planned land uses and the wider residential land uses in the surrounding area. The site is brownfield site of 0.45 ha which currently exists as an off-licence, barbers, betting office, cottage, and associated hard standing surface car park. The proposed infill development is an effective use of the land, due to the existing availability of critical infrastructure, such as sewage, roads, and public transportation systems.

It is considered that the proposed development will enhance the landscape in the area, replacing a brownfield site, with a mixed-use scheme which incorporates high quality hard and soft landscaping. These proposals are detailed within the accompanying Landscaping Design Rationale and Drawings prepared by Studio Aula.

The proposed development will require the excavation and removal of soils and materials for the purposes of levelling, excavation for foundations, basement level, landscaping, access and services. It is estimated by the project engineers, PHM Consulting, bulk excavation particular to the basement and attenuation storage for the proposed development is expected to total 6,650m^3. This would equate to 11,305 tonnes of material. The various required diversions will generate circa 800m^3 or 1,360 tonnes of waste excavation materials. It is assumed at this stage given the nature of the proposed development and the existing nature of the site that the majority of the excavation materials will go off-site. Some material may be usable for temporary hardstanding areas.

Water Consumption

The construction or operation of the scheme will not use such a quantity of water to cause concern in relation to significant effects on the environment.

During construction of the scheme, water will be required for offices and welfare facilities, this will be provided by either tanker or temporary connection to the public main by agreement between the Main Contractor and Uisce Éireann. The construction phase will not use such a quantity of water to cause concern in relation to significant effects on the environment.

Once the development is completed and the development is occupied there will be a water primary demand domestic and commercial consumption for usage for showers, toilets and cooking. Potable water requirements for the proposed development have been calculated by PHM Consulting. The Average Water Demand for overall development is 0.51 litres/second, with a Peak Water Demand of 2.58 litres/second. A Pre-connection Enquiry (reference CDS23004453) was submitted to Uisce Éireann to determine the feasibility of connecting to the public water supply and drainage infrastructure. As detailed in the Water Services Report (2023), a response was received from Uisce Éireann on 3rd July 2023 confirming feasibility without the requirement for any infrastructure upgrade.

The existing water infrastructure within the area has been confirmed with Uisce Éireann to have adequate capacity to cater for the proposed development. There is no proposed extraction of groundwater at the site.

Biodiversity

Investigations into the implications on existing biodiversity including species and habitats has been undertaken through the Ecological Impact Assessment (EcIA), Bat Survey Report, and Appropriate Assessment (AA) Screening Report that have been prepared by Flynn Furney Environmental Consultants and included with the planning documentation.

Bat Surveys was carried out by a suitably qualified and experienced Flynn Furney Environmental Consultants ecologist on the 4th, 10th, 13th, and 15th May 2022 and 26th June 2023 relating to the Firhouse Inn and adjacent buildings (both proposed to be demolished). The aim of surveys was to identify the extent and quality of bat habitats present on the site.

The EcIA (2023) defines the site habitats using the Fossitt's Guide to Habitats in Ireland as entirely of Buildings and Artificial Surfaces (BL3). A habitat noted around the site is Mixed Broadleaved/Conifer Woodland (WD2) which occurs in the adjacent Dodder Valley Park. The site is bound by a treeline (WL2). The EcIA defines the site as having low local ecological value.

The on-site habitats were considered to be of extremely limited value for bird species, or amphibian species. As stated in the EcIA (2023), no other species were recorded at the site of the proposed development.

The Bat Survey of Firhouse Inn and Adjacent Buildings (Flynn Furney, 2023) found that there were no bats or evidence of bats noted in the buildings during the survey; no bat droppings or staining around window sills and exposed features around windows and walls were found during the survey; and no bats were seen emerging from or re-entering the properties during the survey. It was noted that the roof spaces are extensive in area and have sufficient height to be used by bats.

The accompanying AA Screening Report (Furney Flynn, 2023) has assessed the potential for significant impacts of the construction and operational phases of the proposed development on Natura 2000 sites and habitat loss/alteration, habitat/species fragmentation, disturbance and/or displacement of species, change in population density and changes in water quality.

All Natura 2000 designated sites within 15km of the proposed works were considered during the screening process for the potential of the proposed development to have significant effects upon their qualifying interests or conservation objectives.

Ten (10 no.) designated sites - *Glensmole Valley SAC, the Wicklow Mountains SAC, the Wicklow Mountains SPA, the North Dublin Bay SAC, the South Dublin Bay SAC, the Knocksink Wood SAC, the Ballyman Glen SAC, the North Bull Island SPA, the South Dublin Bay and River Tolka Estuary SPA* and *Rye Water Valley/Carton SAC* - are located within a 15km radius of the Proposed Development. It is stated in the AA Screening that:

> *In view of the best and objective scientific knowledge and in view of the conservation objectives of the European sites reviewed in the screening exercise, the proposed development as described here, individually/in*

combination with other plans and projects (either directly or indirectly) is not likely to have any significant effects on any of the European sites. Therefore, it is recommended to An Bord Pleanála that Appropriate Assessment is not required.

In respect of the foregoing; the low local ecological value for the site; the low importance for roosting, commuting and foraging bats; the lack of direct pathways between the Site and Natura 2000 sites; and brownfield / developed nature of the site; the proposed development is not considered to consume biodiversity resources of sensitivity. However, it is noted that given the suitability of the Firhouse Inn, the future presence of bats cannot be ruled out (Flynn Furney, 2023). A pre-works internal survey of both buildings is required immediately before any works involving demolition and renovation are carried out.

3.5 PRODUCTION OF WASTE

Construction and Demolition Phase

During the construction and demolition phases, waste will be produced from surplus materials such as broken or off-cuts of timber, plasterboard, concrete, tiles, bricks, etc. Waste from packaging (cardboard, plastic, timber) and oversupply of materials may also be generated. The construction contractor will be required to ensure that oversupply of materials is kept to a minimum and opportunities for reuse of suitable materials is maximised.

The proposed development includes the demolition of all existing structures on site which includes the Firhouse Inn building and outbuildings which is an old building constructed with solid stone masonry walls with timber floors and a slate over timber structure roof. The second building which is the barber/betting office is a newer building constructed of concrete masonry walls and concrete floors with slate roof over timber structure. All areas designated for demolition are shown on the demolition drawings as included with the application and prepared by the project architects, O'Mahony Pike.

PHM Consulting have produced a Construction Waste Management Plan (2023) which estimates the waste generation, off-site reuse, recycle and disposal rates for construction and demolition waste, respectively, for the proposed development. These are presented in Table 3.1 and Table 3.2.

Table 3.1 *Estimated off-site reuse, recycle and disposal rates for demolition waste*

Demolition of Existing Buildings							
Waste Type	Weight	Reuse/Recovery		Recycle		Disposal	
	Tonnes	%	Tonnes	%	Tonnes	%	Tonnes
Single Storey Building							
Rubble	90	40	36	0	0	60	54
Natural Slate	5	60	3	0	0	40	2
Timber	5	0	0	0	0	100	5
Two Storey Building							
Rubble	700	40	280	0	0	60	420
Masonry	500	0	0	0	0	100	500
Timber	25	0	0	0	0	100	25
Natural Slate	15	60	9	0	0	40	6
Fibre Cement Slate	4	0	0	0	0	100	4
Steel	5	0	0	100	5	0	0
Two Storey New Building							
Masonry	320	0	0	0	0	100	320
Concrete	40	0	0	0	0	100	40
Timber	5	0	0	0	0	100	5
Fiber Cement Slate	10	0	0	0	0	100	10
Steel	10	0	0	100	10	0	0
Total	**1734**	**19**	**328**	**0.9**	**15**	**80**	**1391**

Table 3.2 *Estimated off-site reuse, recycle and disposal rates for construction waste*

Waste Type	Tonnes	Reuse/Recovery		Recycle		Disposal	
		%	Tonnes	%	Tonnes	%	Tonnes
Mixed C&D	360	10	6	80	288	10	36
Wood	30	40	13	55	16.5	15	4.5
Cementitious Board	110	30	33	60	66	10	11
Metals	85	5	4.25	90	76.5	5	4.25
Concrete	65	30	19.5	65	42.25	5	3.25
Other	160	20	32	60	96	20	32
Total	**810**		**136.75**		**585.25**		**88**

Waste will also be generated from construction workers e.g., organic/food waste, dry mixed recyclables (wastepaper, newspaper, plastic bottles, packaging, aluminium cans, tins and Tetra Pak cartons), mixed non-recyclables and potentially sewage

sludge from temporary welfare facilities provided onsite during the construction phase. Waste printer/toner cartridges, waste electrical and electronic equipment (WEEE) and waste batteries may also be generated infrequently from site offices.

It should be noted that until final materials and detailed construction methodologies have been confirmed it is difficult to predict with a high level of accuracy the construction waste that will be generated from the construction of the proposed development as the exact materials and quantities may be subject to some degree of change and variation during the construction process. However, the above estimates are considered to be the worst-case scenario.

Operational Phase

The proposed development will give rise to a variety of everyday waste and recycling from the development during the operational phase, i.e. when the project is completed, and fully operational. The typical non-hazardous and hazardous wastes that will be generated at the proposed development will include the following:

- Dry Mixed Recyclables (DMR) - includes wastepaper (including newspapers, magazines, brochures, catalogues, leaflets), cardboard and plastic packaging, metal cans, plastic bottles, aluminium cans, tins and Tetra Pak cartons;
- Organic waste – food waste and green waste generated from internal plants / flowers;
- Glass; and
- Mixed Non-Recyclable (MNR)/General Waste.

In addition to the typical waste materials that will be generated at the development on a daily basis, there will be some additional waste types generated less frequently / in smaller quantities which will need to be managed separately including:

- Green / garden waste may be generated from external landscaping;
- Batteries (both hazardous and non-hazardous);
- WEEE (both hazardous and non-hazardous);
- Printer cartridges / toners;
- Chemicals (paints, adhesives, resins, detergents, etc.);
- Light bulbs;
- Textiles;
- Waste cooking oil (if any generated by the residents or commercial tenants);
- Furniture (and, from time to time, other bulky wastes); and
- Abandoned bicycles.

Wastes should be segregated into the above waste types to ensure compliance with waste legislation and guidance while maximising the re-use, recycling and recovery of waste with diversion from landfill wherever possible.

O'Connor Sutton Cronin have produced an Operational Waste Management Plan (2022) which estimates waste generation for the development for the main waste types during the operational phase of the proposed development.

As stated within the Operational Waste Management Plan (2022), the waste storage facilities guidelines presented in Appendix C of the Eastern-Midlands Regional Waste Management Plan recommendation is 1 no. bin of 1100L (0.5 tonnes) for every 15 persons. Based on the estimate of 268 residents in the development, this site requires 18 no. bins of 1100L for household waste.

The total proposed area occupied by the café, the barber, the medical unit, the office and the betting office is 241m^2. The area occupied by the crèche is 114 m^2. The Operational Waste Management Plan (2022) has estimated that based on these areas a minimum of 5 no. bins of 1100L for commercial use. For safety, a total of 7 no. of bins will be used for commercial bin storage.

All waste contractors collecting waste from the site must hold a valid collection permit to transport waste must be held by each waste contractor which is issued by the National Waste Collection Permit Office (NWCPO) and waste will only be brought to suitably registered/permitted/licenced facilities. It is essential that all waste materials are dealt with in accordance with regional and national legislation, as outlined previously, and that time and resources are dedicated to ensuring efficient waste management practices.

These measures will ensure the waste arising from the development is dealt with in compliance with the provisions of the *Waste Management Act 1996*, as amended, associated Regulations, the *Litter Pollution Act 1997*, the *EMR Waste Management Plan (2015 - 2021)* and draft *National Waste Management Plan for a Circular Economy (2023)*. It will also ensure optimum levels of waste reduction, reuse, recycling and recovery are achieved.

3.6 POLLUTION AND NUISANCES

There are potential short-term nuisances such as dust, noise, as well as the potential for pollution of groundwater associated with construction activities. These construction activities shall only take place in accordance with standard construction times or permitted times as conditioned as follows: 7am – 7pm Monday to Friday; 7am – 2pm Saturdays, with no works Sundays or on Public Holidays. No activity, which would reasonably be expected to cause annoyance to residents in the vicinity, will take place outside of these hours. If there is any occasion when work must be complete outside these hours advance notice will be provided to the local authority, businesses and residents in the vicinity.

The Construction Environmental Management Plan (CEMP) for the proposed development has been prepared by PHM Consulting and submitted with the planning documentation. The CEMP outlines construction phase mitigation and management of; air quality control (dust), noise and vibration, fuel and chemical handling groundwater and surface water, and erosion and sediment control measures that will be undertaken during the construction phase. All mitigation measures outlined therein will be implemented, as well as any additional measures required pursuant to planning conditions which may be imposed.

The CEMP will be a live document and it will go through a number of iterations before works commence and during the works. The CEMP sets out requirements and standards which must be met during the construction stage and includes the relevant mitigation measures. These measures associated with the construction phase are best practice measures, and are in no way included to avoid or reduce any potential harmful effects to any European sites.

This CEMP will be maintained by the contractors during the construction and operational phases and covers all potentially polluting activities and include an emergency response procedure. All personnel working on the site will be trained in the implementation of the procedures.

After the implementation of a robust CEMP, pollution and nuisances during construction are not considered likely to have the potential to cause significant effects on the environment.

During the operation of the proposed development the residential and commercial units will be managed effectively in accordance with planning conditions to avoid nuisance.

3.7 RISK OF MAJOR ACCIDENTS AND/OR DISASTERS

Landslides, Seismic Activity and Volcanic Activity

There have been no recorded landslide events at the site. Due to the local topography and the underlying strata, there is a negligible risk of a landslide event occurring at the site. There is a very low risk of seismic activity to the proposed development site. There are no active volcanoes in Ireland so there is no risk from volcanic activity.

Flooding/Sea Level Rise

A Flood Risk Assessment (FRA) is included as Section 7 of the Water Services Report (2023) prepared by PHM Consulting. The potential risk of flooding on the site was reviewed with regard to incidences of historical, regional and local flooding relevant to the area of the subject site.

The FRA notes that the site would be considered an area of low risk of fluvial or coastal flooding and not deemed at risk of pluvial or groundwater flooding. No flood incidents have been recorded on the site or in any area adjacent to the site. The FRA concludes that there is no significant risk of flooding due to the development and that given the SuDS measures incorporated in the proposed development, there will be a reduction in both volume and rate of surface water discharge from the site which will reduce the risk of flooding to public infrastructure post development.

It is the opinion of PHM Consulting that the proposed development site is located within a Flood Zone C and therefore the proposed development is deemed acceptable under the Flood Protection Guidelines, and a justification test is not required. .

Major Accidents/Hazards

The potential interaction with sites registered under the Seveso Directive (Directive 82/501/EEC, Directive 96/82/EC, Directive 2012/18/EU) and the Chemicals Act (Control of Major Accident Hazards involving Dangerous Substances) Regulations 2015 (S.I. No. 209 of 2015) (the “COMAH Regulations”), which implement the latest Seveso III Directive (2012/18/EU) has been considered in respect to notified installations and their proximity to the proposed development site.

The Irish Distillers Ltd site (Lower Tier Seveso site) at 7-9 Robinhood Road, Fox and Geese, Dublin 22 this is the closest Seveso site to the proposed development and is located 4 km to the north. The consultation distance for the Irish Distillers Ltd is 300 m as listed within Appendix 8 of the Dublin City Development Plan 2022 – 2028. The B.O.C. Gases site (Upper Tier Seveso site) is located 4.2 km from the proposed development site. The consultation distance for the B.O.C. Gases site is 700 m as listed within Appendix 8 of the Dublin City Development Plan 2022 – 2028.

Due to the proposed development falling well beyond the consultation distanced of the closest Seveso sites these sites will not form a constraint to the proposed residential and commercial development at this location.

Minor Accidents/Leaks

There is a potential impact on the receiving environment as a result of minor accidents/leaks of fuel/oils during the construction. However, the implementation of the mitigation measures set out in this report and the CEMP accompanying the application will ensure that the residual effect on the environment is imperceptible.

3.8 RISKS TO HUMAN HEALTH

The EC 2017 *Guidance on the preparation of the Environmental Impact Assessment Report* outlines that human health is a very broad factor that is be highly project dependent. The guidance states: *The notion of human health should be considered in the context of the other factors in Article 3(1) of the EIA Directive and thus environmentally related health issues (such as health effects caused by the release of toxic substances to the environment, health risks arising from major hazards associated with the Project, effects caused by changes in disease vectors caused by the Project, changes in living conditions, effects on vulnerable groups, exposure to traffic noise or air pollutants) are obvious aspects to study.*

The EPA guidance explains that the scope of population and human health is project dependant but should consider significant impacts likely to affect aspects such as: convenience (expanded range of transport options); nuisance/ disturbance from lighting; displaced settlement patterns (residential); employment opportunities; settlement patterns; land use patterns; access for tourism, amenity, health impacts and/or nuisance due to noise, dust or water pollution; and health and safety.

The characteristics of the proposed development, in terms of the risks to human health (for example, due to water contamination or air pollution) have been considered. The primary potential impacts of the proposed development on human health would be increased air pollution, noise, traffic, visual impact, or pollution of groundwater/watercourses as a result of the proposed development.

The subject site is located in an area zoned for residential development, proximate to the Dodder Riverbank Park and public transport services. The subject site is zoned for residential use, as set out in the South Dublin County Council Development Plan 2022 - 2028.

It is anticipated that an increase in residential and commercial development at this location would not have a significant negative impact on local parks, local tourism or shopping amenities that would pose a risk to human health. The increase in local population would only serve to continue the existing usage of such facilities. Geological Survey Ireland (GSI) data indicates that the site does not lie within a drinking water protection area. The area is serviced by mains water supply therefore it is unlikely that any wells are used for potable water supply. The proposed mitigation measures during the construction phase, including the implementation of a CEMP will ensure that there are no impacts on groundwater or the stormwater mains.

The proposed development design includes an appropriately designed stormwater network that will ensure that during the operational phase the risk from diesel spills through the carparks or unloading areas is minimised. Wastewater from the proposed

development will connect to mains supplies and will not have a potential impact on local amenities or the local population.

The CEMP will incorporate and best practice construction methodologies for the control of dust generation, traffic, and noise, as well as the management of impacts on groundwater or the existing drainage ditches during the construction phase. Any impacts associated with construction dust generation, traffic, and noise will be short term. These measures associated with the construction phase are best practice measures and are in no way included to avoid or reduce any potential harmful effects to any European sites.

4.0 LOCATION AND CONTEXT OF THE PROPOSED DEVELOPMENT

4.1 EXISTING AND APPROVED LAND USE

The subject site as existing comprises of the former 'The Firhouse Inn' public house and off-licence, barbers, betting office, cottage and other ancillary structures and is located at Firhouse Road, Firhouse, Dublin 24, and falls within the administrative area of South Dublin County Council. The site exists at present as an area with several commercial units and associated hard standing surface car park. There is no notable landscaping or planting on the site.

The boundary of the site comprises a combined stone and concrete block wall to the west, north and east of the site. Mature deciduous and coniferous trees exist on the opposite side of the walls to the west and north. Mount Carmel Park road straddles the east of the site while the site is bounded to the south by Firhouse Road.

The site is bound by Dodder Riverbank Park to the north and west of the site. Mount Carmel Park comprises residential houses which lie to the east while residential houses and Sally Park Nursing home stand on the far side of the Firhouse Road to the south of the site.

As stated in the SDCC Development Plan 2022 – 2028 Zoning maps the site is zoned as "*To protect, improve and provide for the future development of Local Centres".*

There are a variety of public transport options available to visitors and residents at the subject site. There are pedestrian routes, bus routes, cycling paths, and Luas facilities within reach of the development, providing significant connectivity to major destinations such as Dundrum Shopping Centre, Dún Laoghaire and the City Centre area.

Nearby recreational facilities include the Tallaght Sports Complex, Dodder Riverbank Park, Firhouse Carmel Football Club pitch, National Basketball Arena and the Greenhills Archers Club.

4.2 RELATIVE ABUNDANCE, AVAILABILITY, QUALITY AND REGENERATIVE CAPACITY OF NATURAL RESOURCES IN THE AREA AND ITS UNDERGROUND

4.2.1 Hydrogeology

The GSI (2024) National Bedrock Aquifer Map, the GSI classifies the bedrock aquifer beneath the subject site as a 'Locally Important Aquifer – Bedrock which is Moderately Productive only in Local Zones'. The proposed development is within the 'Dublin' groundwater body and is classified as 'Poorly productive bedrock'. The most recent

WFD groundwater status for this water body (2013-2018) is 'Good' with a current WFD risk score of 'Not at risk'.

The topsoil beneath the site and to the immediately south and east surrounding area is classified as Made Ground. Directly north and west of the site is BminSW - Shallow well drained mineral (Mainly basic) classification.

The GSI/ Teagasc (2024) mapping database of the quaternary sediments in the area of the subject site indicates the principal subsoil type in the residential area comprises Limestone till (TLs, i.e. Till derived from limestone). Mapping from the Geological Society of Ireland (GSI, 2024) indicates the bedrock underlying the site is part of the Lucan Formation (code CDLUCN) and made up of dark limestone and shale (Calp).

The GSI Well Card Index is a record of wells drilled in Ireland, water supply and site investigation boreholes. It is noted that this record is not comprehensive as licensing of wells is not currently a requirement in the Republic of Ireland. This current index does not show any wells drilled or springs at the site or surrounding area. The area is serviced by Local Authority mains therefore it is unlikely that any wells are used for potable supply. The site is not located near any public groundwater supplies or group schemes. There are no groundwater source protection zones in the immediate vicinity of the site.

The Dodder Terraces (SD004) is a geological heritage site which runs adjacent to the north and west boundary to the proposed development site. The proposed development will not infringe on the geological heritage site.

4.2.2 Hydrology

The proposed development site lies within the Liffey and Dublin Bay catchment (Hydrometric Area 09) and River Dodder sub-catchment (WFD name: Dodder_SC_010, Id 09_16) (EPA, 2024).

There are no waterbodies within the site of the proposed development. The closest surface water feature to the proposed development is the Dodder River, located c. 180 m to the north of the site. The River Dodder continues to flow north east for a further ~9.4 km before discharging into the Liffey Estuary lower transitional waterbody which in turn discharges into Dublin Bay coastal waterbody which includes Special Area of Conservation (SAC) and proposed Natural Heritage Area (pNHA). The Whitestown Stream, is located c. 400 m to the west of the development site. This Whitestown Stream is a tributary of the River Dodder and joins the River Dodder upstream from/ to the west of the development site.

Stormwater from the proposed development site shall discharge to the existing 300 mm surface water sewer located on the Mount Carmel Park road, and which is being diverted from its current location which runs diagonally across the rear of the site, , to along the Firhouse Road and turning down onto Mount Carmel Park. The stormwater will ultimately outfall to to the River Dodder. The River Dodder ultimately outfalls to the Liffey Estuary, which is hydrologically connected to the South Dublin Bay SAC, North Dublin Bay SAC, North Bull Island SPA and South Dublin Bay and River Tolka Estuary SPA.

There is, therefore, an indirect pathway from the proposed development to these designated European sites.

The Dodder sub-catchment discharges into the Liffey Estuary Lower. The River Dodder (DODDER_040_) has a WFD status (2013-2018) of 'Poor; the Dublin Bay Coastal waterbody has a WFD status of 'Good'. The Liffey Estuary Lower waterbody has a WFD risk score of 'At risk of not achieving good status' while the Dublin Bay waterbody has a WFD risk score of 'Not at risk'. The surface water quality data for the Liffey Estuary and Dublin Bay (EPA, 2024) indicate that they are 'Unpolluted'. Under the 2015 'Trophic Status Assessment Scheme' classification of the EPA, 'Unpolluted' means there have been no breaches of the EPA's threshold values for nutrient enrichment, accelerated plant growth, or disturbance of the level of dissolved oxygen normally present.

This 'Poor' WFD status for the River Dodder is related to its biological status (invertebrate); all chemical conditions have been assigned a value of "pass" or "high". The most recent quality data (1998) in the proximity of the site (c. 230 m) for the River Dodder (RS09D010420) indicated that the quality was 'Good' giving it a Q value of 4.

All foul drainage is to be drained by gravity via a minimum 225mm sewer system and is to be connected to the existing Public Sewer. The foul water from the site will then be pumped to Ringsend Waste Water Treatment Plant (WWTP) where it will be treated and discharged to the Dublin Bay. There is, therefore, also an indirect pathway from the proposed development to the designated European sites at Dublin Bay (South Dublin Bay SAC, North Dublin Bay SAC, North Bull Island SPA and South Dublin Bay and River Tolka Estuary SPA).

Given the nature of the proposed residential and commercial development site, there will not be perceptible effect on the River Dodder taking into account the extent of loading of potential contaminant, distance between the source and the river and significant dilution in the surface water sewer will ensure any released hydrocarbons (or other contaminants) are at background levels (i.e., with no likely impact above water quality objectives as outlined in S.I. No. 272 of 2009, S.I. No. 386 of 2015 and S.I. No. 77 of 2019). Therefore, there will no effect on the ability for the River Dodder to attain a 'Good' status in the future.

There is no perceptible effect on Dublin Bay. Given the nature of the proposed residential and commercial development, even without treatment at Ringsend WWTP the average effluent discharge would not impact on the overall water quality within Dublin Bay and therefore would not have an impact on the current Water Body Status (as defined within the Water Framework Directive). In regards to the linkage through the stormwater drainage, no perceptible effect is foreseen either taking into account the extent of loading of contaminant, distance between the source and Dublin Bay (c. 17.8 km) and significant dilution in the surface water sewer will ensure any released hydrocarbons are at background levels (i.e., with no likely impact above water quality objectives as outlined in S.I. No. 272 of 2009, S.I. No. 386 of 2015 and S.I. No. 77 of 2019).

4.2.3 Biodiversity and Areas of Conservation

The potential ecological impacts of proposed development have been considered in terms of the sensitivity of the location through the Ecological Impact Assessment (2023) and AA Screening Report (2023) included with the planning documentation.

The site habitats consist of Buildings and Artificial Surfaces (BL3).

There is a total of 7 no. SACs and 3 no. SPAs located within 15km of the proposed development, with no Natura 2000 sites within 5 km. The closest sites are the Wicklow

Mountains SPA and SAC (site code 4040) located 5.7km and 6km respectively from the site and South Dublin Bay SAC and South Dublin Bay and River Tolka Estuary SPA (site code 004006) both located 9.9km from the site.

The AA Screening (2023) states that there is no direct hydrological connection between the site and any Natura 2000 sites or SACs or SPAs located within the Zone of Influence. There are however indirect hydrological connections as stated in Section 4.2.2 above.

4.3 ABSORPTION CAPACITY OF THE NATURAL ENVIRONMENT

The proposed development due to its size and localised nature will not have any effect on wetlands, riparian areas, river mouths, coastal zones and the marine environment, mountain and forest areas, and nature reserves, or densely populated areas.

The River Dodder is a proposed Natural Heritage Area (pNHA) which is located within close proximity to the site. There indirect hydrological connections to coastal zones and the marine environment as stated in Section 4.2.2 above. The distance from source to coastal zones and the marine environment is ~9.4 km.

An area of geological interest, known as the “Dodder Terraces”, is located in close proximity to the site and also straddle the north and western boundaries of the site. As mentioned in Section 4.2.1, the proposed development will not infringe on the geological heritage site.

As indicated on Figure 4.1 below, there is an area zoned to “Protect and Preserve Significant Views”, looking from the N81 across Riverbank Park with views of the Wicklow Mountains.

The SDCC Development Plan 2022 - 2028 Zoning Map 9 highlights areas of particular interest in close proximity to the proposed development site.

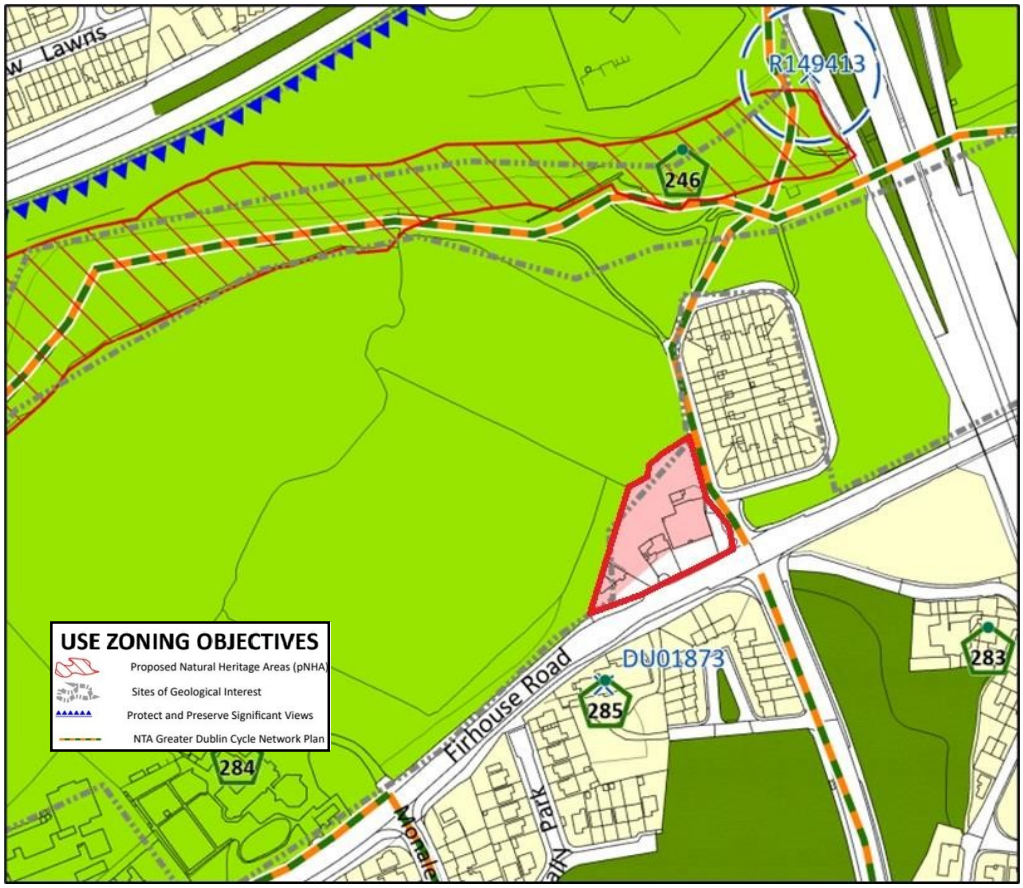

Figure 4.1 *Areas of Interest (Source: Draft SDCC Development Plan 2022 - 2028 Map 9)*

Photomontages prepared by Digital Dimensions Architectural Visualisation, and The VIA prepared by Doyle + O'Troithigh include a view of the site from the area designated to '*Protect and Preserve Significant Views*' above in Figure 4.1. Refer to Digital Dimensions Architectural Visualisation, and The VIA prepared by Doyle + O'Troithigh and Section 5.6 below.

The development site is not located within or adjoining an Architectural or General Conservation Area and is not located within or adjoining a Native Woodland Trust.

The environmental sensitivity of the proposed location in respect of Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive has been addressed in the AA Screening Report and EcIA prepared by Flynn Furney.

5.0 TYPES AND CHARACTERISTICS OF POTENTIAL IMPACTS

This section sets out the likely significant effects on the environment of proposed development in relation to criteria set out under paragraphs 1 and 2 (as set out in Sections 4 and 5 above), 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 (as amended).

The quality, magnitude and duration of potential impacts are defined in accordance with the criteria provided in the *Guidelines on Information to be Contained in*

Environmental Impact Assessment Reports (EPA, 2022) this criteria is duplicated in Table 5.1.

Table 5.1 *Schedule of Impacts following EPA 2022 Guidelines*

Characteristic	Term	Description
Quality of Effects	Positive	A change which improves the quality of the environment
	Neutral	No effects or effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error.
	Negative/Adverse	A change which reduces the quality of the environment
Describing the Significance of Effects	Imperceptible	An effect capable of measurement but without significant consequences
	Not significant	An effect which causes noticeable changes in the character of the environment but without significant consequences
	Slight Effects	An effect which causes noticeable changes in the character of the environment without affecting its sensitivities
	Moderate Effects	An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends
	Significant Effects	An effect, which by its character, magnitude, duration or intensity alters a sensitive aspect of the environment
	Very Significant	An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment.
	Profound Effects	An effect which obliterates sensitive characteristics
Describing the Extent and Context of Effects	Extent	Describe the size of the area, the number of sites, and the proportion of a population affected by an effect.
	Context	Describe whether the extent, duration, or frequency will conform or contrast with established (baseline) conditions (is it the biggest, longest effect ever?)
Describing the Probability of Effects	Likely Effects	The effects that can reasonably be expected to occur because of the planned project if all mitigation measures are properly implemented.
	Unlikely Effects	The effects that can reasonably be expected not to occur because of the planned project if all mitigation measures are properly implemented.
Describing the Duration and Frequency of Effects	Momentary Effects	Effects lasting from seconds to minutes
	Brief Effects	Effects lasting less than a day
	Temporary Effects	Effects lasting less than a year
	Short-term Effects	Effects lasting one to seven years.
	Medium-term Effects	Effects lasting seven to fifteen years
	Long-term Effects	Effects lasting fifteen to sixty years
	Permanent Effects	Effects lasting over sixty years

Characteristic	Term	Description
	Reversible Effects	Effects that can be undone, for example through remediation or restoration
	Frequency of Effects	Describe how often the effect will occur. (once, rarely, occasionally, frequently, constantly – or hourly, daily, weekly, monthly, annually)
Describing the Type of Effects	Indirect Effects (a.k.a secondary or Off-site effects)	Effects on the environment, which are not a direct result of the project, often produced away from the project site or because of a complex pathway.
	Cumulative Effects	The addition of many minor or insignificant effects, including effects of other projects, to create larger, more significant effects.
	'Do Nothing Effects	The environment as it would be in the future should the subject project not be carried out
	`Worst case' Effects	The effects arising from a project in the case where mitigation measures substantially fail
	Indeterminable Effects	When the full consequences of a change in the environment cannot be described
	Irreversible Effects	When the character, distinctiveness, diversity, or reproductive capacity of an environment is permanently lost
	Residual Effects	The degree of environmental change that will occur after the proposed mitigation measures have taken effect
	Synergistic Effects	Where the resultant effect is of greater significance than the sum of its constituents (e.g. combination of Sox and NOx to produce smog)

5.1 POPULATION AND HUMAN HEALTH

5.1.1 Construction Phase

The potential impacts of the proposed development on population human health and populations would be nuisances such increased air pollution (dust), noise, traffic, and visual impacts of the construction and demolition phases. The likely potential impact of the proposed development with respect to population and human health during the construction phase can be considered to be; ***negative***, ***not significant*** and ***short-term.***

These potential short-term impacts during the construction phase will be mitigated in accordance with the CEMP and through implementation of binding hours of construction.

There is no significant risk of pollution of soil, groundwater or watercourses associated with the proposed development. The construction phase of the proposed development will provide for the temporary employment of construction workers which will provide benefits for local businesses providing retail or other services to construction workers and potential additional employment in the area.

The existing structures on site will be demolished as an enabling works contract prior to the construction of the proposed development. As the existing building was constructed and in use over a period when asbestos was widely used in buildings, a

detailed asbestos survey will be carried out prior to the commencement of demolition works.

The CEMP sets out mitigation measures in the form of requirements and standards in relation to construction noise, traffic, and dust generation that must be met during the construction stage. The accompanying outline CEMP prepared by PHM Consulting notes that development will be undertaken in accordance with all regulatory, legal and other requirements with all mitigation and safety measures put in place to ensure a responsibly managed construction process. All mitigation measures outlined therein will be implemented, as well as any additional measures required pursuant to planning conditions which may be imposed.

The residual impact of the proposed development with respect to population human health during the construction phase after the implementation of mitigation measures set out in this report, is ***negative*** and ***short-term***.

Having regard to the foregoing, the effect of population and human health impacts arising from the proposed development during the construction phase is ***not significant***.

5.1.2 Operational Phase

Upon completion, the operational phase will provide an important material asset for the area in terms of high-quality residential housing, easing the pressure on the rental market.

The proposed development will not result in any off-site exceedance of the relevant ambient air quality standards, see Section 5.4 for further detail. The proposed development will not generate significant outward noise, see Section 5.5 for further detail.

There are no planned direct discharges to water or land, although the risk of accidental discharge or spills exists. A number of design measures are proposed to prevent the contamination of groundwater during the operational phase as described in Section 5.2.

The design of the proposed development has due regard of the sensitivity of the surroundings, and is not likely to adversely impact on local populations. Landscape and Visual impacts are discussed further in Section 5.6.

The proposed development comprises a residential development which is not expected to significantly add to the current noise level of the surround environment. Noise and Vibration impacts are discussed further in Section 5.5.

The residual impact of the proposed development with respect to populations and human health during the operational phase is ***positive*** and ***long-term***.

Having regard to the foregoing, the effect of population and human health impacts arising from the proposed development during the operational phase is ***not significant***.

5.2 LAND, SOILS, GEOLOGY, HYDROGEOLOGY, HYDROLOGY

5.2.1 Construction Phase

Potential for increased sediment and runoff from excavation, soil handling, removal and compaction

Land clearing, earthworks and excavations will be required for construction phase operations to facilitate site clearance, construction of new building, basements, foundations and installation of services. This will include site levelling, construction, and building foundation excavation, this will necessitate the removal of existing hardstanding cover and the excavation of soil and subsoils.

The construction works will alter the current drainage regime from the brownfield site. and the rate and volume of direct surface run-off. The potential impact of this is a possible increase in surface water run-off and sediment loading, which could potentially impact local drainage if not adequately mitigated.

Run-off water containing silt will be contained on-site via settlement tanks and treated to ensure adequate silt removal. Silt reduction measures on site will include a combination of silt fencing, settlement measures (silt traps, silt sacks and settlement tanks / ponds).

Movement of material will be minimised to reduce the degradation of soil structure and generation of dust. Excavations will remain open for as little time as possible before the placement of fill. This will help to minimise the potential for water ingress into excavations. Soil from works will be stored away from existing drainage features to avoid any potential impact.

The site preparation, excavations and levelling works required to facilitate construction of foundations, access roads and the installation of services will require excavation of soil, stones, and bedrock (if encountered). It has been estimated by the project engineers, PHM Consulting, that c**.** 11,746 m^3 of soils will be excavated to facilitate the development. Any material, which is exported from site, if not correctly managed or handled, could impact negatively on human beings (onsite and offsite) as well as water and soil environments.

Prior to removal, all excavated materials will be visually assessed for signs of possible contamination such as staining or strong odours. Should any unusual staining or odour be noticed, samples of this soil will be analysed for the presence of possible contaminants in order to ensure that historical pollution of the soil has not occurred. Should it be determined that any of the soil excavated is contaminated, this will be disposed of by a licensed waste disposal contractor.

Excavated soil will arise during the construction period and will be stored (if required) on site prior to being removed by a specialist contractor as detailed within the accompanying CWMP prepared by PHM Consulting.

Stockpiles of soil and construction aggregate can have the potential to cause negative impacts on air and water quality. The effects of soil stripping and stockpiling will be mitigated against through the implementation of appropriate earthworks handling protocol during construction. It is anticipated that any stockpiles will be formed within the boundary of the site and there will be no direct link or pathway from this area to any surface water body. Overburden material will be protected from exposure to wind by storing the material in sheltered parts of the site, where possible.

In respect of the foregoing, and the measures set out in the project CEMP, the residual impact as a result of the potential for increased sediment and runoff from excavation works on, land, soils, geology, hydrogeology, and hydrology during operation is considered to be ***negative, imperceptible*** and **short-term**.

Potential for contamination from Accidental Spills and Leaks

There is potential for water (rainfall and/or discontinuous perched groundwater) to become contaminated with pollutants associated with construction activity. Contaminated water which arises from construction sites can pose a significant short-term risk to water quality for the duration of the construction if contaminated water is allowed percolate to the aquifer or accidental discharges into surface water.

Machinery activities on site during the construction phase may result in run off of contaminated waters into surface water networks or ground water. Potential impacts could arise from accidental spillage of fuels, oils, paints, cement, etc. which could impact surface water if allowed to runoff into surface water systems and/or receiving watercourses or groundwaters.

The potential impacts during the construction phase are required to be mitigated by ensuring best practice construction with respect to storage of any hazardous substances (fuels, chemicals and other construction materials that may pose a risk to the environment). The project specific CEMP sets out these best practice construction methodology to manage the risk of accidental spills and leaks. These measures associated with the construction phase are best practice measures, and are in no way included to avoid or reduce any potential harmful effects to any European sites.

Given scale and localised nature of the proposed development, and the lack of impact pathways between the Site and surface water bodies here is no likelihood of significant effects on water quality.

In respect of the foregoing, and the measures set out in the project CEMP, the residual impact in respect of the potential for impacts related to contamination from accidental spills on, soils, geology, hydrogeology, and hydrology during operation is considered to be ***negative, imperceptible*** and **short-term.**

Dewatering, Run-off and Sediment Loading

There is the potential for contaminated surface water run-off from site preparation, levelling, landscape contouring and excavations during the construction phase may contain increased silt levels or become polluted from construction activities. Silt water can arise from excavations, exposed ground, stockpiles, and access roads.

Construction water containing large amounts of silt or other contaminants such as hydrocarbons has the potential to cause negative, and short-term impacts receiving surface water bodies, or surface water networks, if not adequately mitigated.

The Construction Environmental Management Plan (CEMP) prepared by PHM Consulting and sets out a framework of measures to address the implications of the construction works.

The CEMP details measures to help ensure that the receiving surface water drainage network is sufficiently protected for the duration of the proposed works. It is noted that these are standard construction best-practise procedures and are in no way included as mitigation to protect any European Sites. Where dewatering is required during the

construction phase, dirty water will be fully and appropriately attenuated, through silt bags, before being appropriately discharged No silty or contaminated water from the construction works will be discharged to any stormwater network.

In respect of the foregoing, and the measures set out in the project CEMP, the residual impact in respect of the potential for impacts related to dewatering on, soils, geology, hydrogeology, and hydrology during operation is considered to be ***negative, imperceptible*** and **short-term.**

Foul Water during construction

Welfare facilities will be provided for the contractors on site during the construction works. During construction, portable sanitary facilities will be provided with waste collected and disposed of appropriately. There are no predicted adverse impacts on wastewater during construction.

No silty or contaminated water from the construction works will be discharged to any stormwater network but should any discharge of contaminated construction water be required during the construction phase, the discharge will be to foul sewer following agreement with Uisce Éireann.

With due consideration to the characteristics of the proposed development and the site location, there are no likely potential impacts of the proposed development in relation to foul water during construction, under the environmental factor of land, soils, geology, hydrogeology, and hydrology.

Having regard to the foregoing, the effect of land, soils, geology, hydrogeology, hydrology impacts arising from the proposed development during the construction phase is ***not significant***.

5.2.2 Operational Phase

Direct and Indirect Discharges Management

The proposed stormwater drainage strategy is to collect all run-off from roofs, upper level garden areas, ground level paved areas and basement levels and to discharge to the public sewer network located on Mount Carmel Park. Where possible all water will be conveyed via a gravity system. The design of the stormwater drainage network for the proposed development has taken cognisance of the objectives and guidance contained in the Greater Dublin Strategic Drainage Study (GDSDS). The proposed Sustainable Urban Drainage Systems (SuDS) method of water disposal at the site will ensure that no negative impacts to surface water or stormwater leaving the site will arise due to the attenuation measures planned, with the proposal improving the water environment at the location. The SUDS features associated with the proposed development are not included within the design to avoid or reduce any potential harmful effects to any European sites.

The stormwater and surface water drainage and disposal of foul water is detailed further within the accompanying Water Services Report prepared by PHM Consulting.

No direct hydrological connection exists between the site and any Natura 2000 sites or SACs or SPAs located within the Zone of Influence. The nature of the proposed development, separation distances, and dilution factors means that there is no likelihood of significant effects on water quality in Dublin Bay and the SAC / SPA located there, as a result of the proposed development.

The residual impact on land, soils, geology, hydrogeology, and hydrology during operation is considered to be ***neutral, imperceptible*** and ***long term.***

Flood Risk

The proposed SuDS measures ensures the proposed development has been designed to cater for 1:30-year and 1:100-year storm events, mitigating the risk of flooding within the confines of the site. A Justification Test is not deemed necessary as the site is located within a Flood Zone Type C area[5]. The PHM Consulting FRA concludes that *'Having considered the various forms of flooding which presents risk to persons and property – Fluvial, Coastal, Pluvial, Groundwater, it is concluded that the proposed development is located within a Flood Zone C and therefore deemed acceptable under the Flood Protection Guidelines'*.

The residual impact on land, soils, geology, hydrogeology, and hydrology during operation is considered to be ***neutral, imperceptible*** and ***long term.***

Having regard to the foregoing, the effect of land, soils, geology, hydrogeology, hydrology impacts arising from the proposed development during the operational phase is ***not significant***.

5.3 BIODIVERSITY

5.3.1 Construction Phase

The potential impact from the proposed development on biodiversity with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive has been considered as a part of the Ecological Impact Assessment, Bat Survey Report and AA Screening Report by Flynn Furney Environmental Consultants provided with the planning documentation.

The site is brownfield in nature and exists as the former 'The Firhouse Inn' public house and off-licence, barbers, betting office, cottage and associated car park. The site is urban in nature and has little value in terms of biodiversity. The AA Screening Report for the site has confirmed that the site is not under any wildlife or conservation designation. Furthermore, no rare, threatened or legally protected species are known to occur on the site.

The following mitigation measures will be incorporated and adhered to during the construction phase of the proposed development to ensure that the works do not result in contravention of wildlife legislation:

1. The recommendations as given in the accompanying Bat Survey report prepared by Flynn Furney Environmental Consultants (2023) are to be followed. During the period October to April inclusive, a pre-works internal survey is required, and demolition works involving the roofs must supervised by an ecologist. If bats are confirmed, works cannot proceed until an NPWS derogation licence is obtained.
2. It is recommended that an ecologist has input into the external lighting plan for the future development to ensure the correct positioning and models of lighting columns are installed and the habitats around the development are not impacted by light overspill.

[5] Flood Zone C means an area where the probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1000 for both river and coastal flooding).

3. In order to avoid any impacts to bird species, it is recommended that no vegetation should be cleared within the site during the bird nesting season (March-August inclusive) in order to protect nesting birds. It is also recommended that the buildings must be surveyed for the presence of any nesting bird species prior to commencement of any site clearance, demolition or construction activity on this site
4. All activities will comply with all relevant legislation and best practice to reduce any potential environmental impacts. The mitigation measures detailed within this EcIA will be fully adhered to; and
5. The Site manager shall ensure that all personnel working on-site are trained and aware of the mitigation measures detailed within the EcIA.

The Ecological Impact Assessment concludes that the mitigation measures once fully implemented will minimise any potential for ecological impacts.

On the basis of the foregoing, and with regard to the evidence set out within the Ecological Impact Assessment and AA Screening Report the potential effects on local biodiversity and ecology are ***neutral***, ***imperceptible,*** and ***short term*** for the construction phase.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the proposed development in respect of biodiversity impacts during the construction phase. Therefore, a requirement for sub-threshold EIA does not arise.

5.3.2 Operational Phase

The accompanying Ecological Impact Assessment and AA Screening Report by Flynn Furney Environmental Consultants has assessed the potential for significant impacts of the operational phases of the proposed development on Natura 2000 sites and habitat loss/alteration, habitat/species fragmentation, disturbance and/or displacement of species, change in population density and changes in water quality.

The development during operation is considered to enhance the biodiversity in the area due to the introduction of a high quality landscaping and planting scheme which will create habitats, as noted by the accompanying drawings and rationale prepared by Studio Aula. In this regard, biodiversity is not likely to be significantly affected by the proposed development.

The following mitigation measures will be incorporated and adhered to during the operational phase of the proposed development to ensure that the works do not result in contravention of wildlife legislation:

1. The recommendations as given in the accompanying Bat Survey report prepared by Flynn Furney Environmental Consultants (2023) are to be followed. Namely, prior to works commencing, emergence (dusk) and re-entry (dawn) watches should be undertaken to ensure no bats are present. These should be carried out during the appropriate season, May to September. If bats are not confirmed exiting or entering the buildings, a further internal survey is required before demolition works involving roofs can commence, under the supervision of an ecologist. During the period October to April inclusive, a pre-works internal survey is required, and demolition works involving the roofs must supervised by an ecologist. If bats are confirmed, works cannot proceed until an NPWS derogation licence is obtained.

2. It is recommended that an ecologist has input into the external lighting plan for the future development to ensure the correct positioning and models of lighting columns are installed and the habitats around the development are not impacted by light overspill.
3. In order to avoid any impacts to bird species, it is recommended that no vegetation should be cleared within the site during the bird nesting season (March-August inclusive) in order to protect nesting birds. This is in order to prevent birds carrying out nesting activity at this site. If works are to take place within the bird nesting season, it is also recommended that a preconstruction survey is carried out by an appropriately qualified ecologist. This is in order to ensure that no bird nesting has taken place since the last survey (July 2022).
4. All activities will comply with all relevant legislation and best practice to reduce any potential environmental impacts. The mitigation measures detailed within this EcIA will be fully adhered to; and
5. The Site manager shall ensure that all personnel working on-site are trained and aware of the mitigation measures detailed within the EcIA

The Ecological Impact Assessment concludes that the mitigation measures once fully implemented will minimise any potential for ecological impacts.

On the basis of the above with regard to the evidence set out within the Ecological Impact Assessment, Bat Survey report and AA Screening Report, the potential effects on local biodiversity and ecology are ***neutral***, ***slight,*** and ***long-term*** for the operational phase.

Having regard to the foregoing, there is no likelihood of significant effects on the environment arising from the proposed development in respect of biodiversity impacts during the operational phase. Therefore, a requirement for sub-threshold EIA does not arise.

5.4 AIR QUALITY AND CLIMATE

5.4.1 Construction Phase

Construction stage traffic and embodied energy of construction materials are expected to be the dominant source of greenhouse gas emissions as a result of the construction phase of the development. Construction vehicles, generators etc., may give rise to some CO_2 and N_2O emissions. However, due to short-term nature of these works, the impact on climate will be ***not significant***, and ***short term***.

Nevertheless, some site-specific mitigation measures can be implemented during the construction phase of the proposed development to ensure emissions are reduced further. In particular the prevention of on-site or delivery vehicles from leaving engines idling, even over short periods. Minimising waste of materials due to poor timing or over ordering on site will aid to minimise the embodied carbon footprint of the site.

The greatest potential impact on air quality during the construction phase of the proposed development is from construction dust emissions and the potential for nuisance dust and PM10/PM2.5 emissions. While construction dust tends to be deposited within 350 m of a construction site, the majority of the deposition occurs within the first 50 m based on Transport Infrastructure Ireland (TII) guidance (2011).

The scheme has potential for dust impacts during construction due to the separation distance between the site and the nearest sensitive receptors, which are located approximately 20-30 metres to the east and south of the site. Therefore, during construction, there is potential for dust impacts on these sensitive receptors which would be considered in the absence of mitigation ***negative, significant*** and ***short-term.***

The pro-active control of fugitive dust will ensure the prevention of significant emissions, rather than an inefficient attempt to control them once they have been released. The main contractor will be responsible for the coordination, implementation and ongoing monitoring of the Dust Management Plan. The key aspects of controlling dust are listed below. These measures incorporated the Construction Environmental Management Plan (CEMP) prepared for the site.

In summary the measures which will be implemented will include:

- During very dry periods when dust generation is likely, construction areas will be sprayed with water.
- Exhaust emissions from vehicles operating within the site, including trucks, excavators, diesel generators or other plant equipment, will be controlled by the contractor through regular servicing of machinery.
- Vehicle speeds will be limited in the construction site.
- Surrounding roads used by trucks to access to and egress from the site will be cleaned regularly using an approved mechanical road sweeper. Roads will be cleaned subject to local authority requirements. Site roads will be cleaned on a daily basis, or more regularly, as required.
- Wheel-wash facilities will be provided to remove excess mud from wheels. These facilities will be located at the exit from the site and away from sensitive receptors, where possible.
- The technique adopted for all works shall minimise the release of dust into the atmosphere.
- Daily visual inspections will be carried out at locations around the site boundary as required.
- These inspections will monitor the effectiveness of dust mitigation measures.

At all times, these procedures will be strictly monitored and assessed. In the event of dust nuisance occurring outside the site boundary, movements of materials likely to raise dust would be curtailed and satisfactory procedures implemented to rectify the problem before the resumption of construction operations.

During construction, the proposed development will give rise to dust in the short term. Mitigation measures proposed in the accompanying construction management plan will ensure dust suppression techniques so as to remain within acceptable levels. These include road sweeping, wheels washing and covered vehicles.

The residual effects on air quality and climate will be***, moderate, negative and short term*** during the construction phase***.***

Having regard to the foregoing, the effect of air quality and climate impacts arising from the proposed development during the construction phase is ***not significant***.

5.4.2 Operational Phase

In relation to the operational phase of the proposed development, the proposed development will not result in any significant emissions of air quality pollutants or

greenhouse gases once operational. Therefore, the potential impact to air quality from the operational phase of the proposed development is expected to be imperceptible. Therefore, no site specific mitigation measures are required.

Current EPA guidance states that a development may have an influence on global climate where it represents "a significant proportion of the national contribution to greenhouse gases" (EPA, 2003). The "*Guidelines On The Information To Be Contained In Environmental Impact Assessment Reports*" (2022) states that impacts relevant to adaptation to climate change should be assessed and that projects should be assessed in terms of their vulnerability to climate change Therefore, the impact to climate from the operational phase of the proposed Project is expected to be imperceptible in terms of national CO_2 emissions and Ireland's agreed limit under the Kyoto Protocol (Framework Convention on Climate Change, 1997, 1999) and the EU Effort Sharing Agreement ("20-20-20" Targets). The proposed Project will not result in any impacts relevant to adaptation therefore the project will not be vulnerable to climate change.

On the basis of the above the potential effects on Air Quality are ***neutral***, ***imperceptible,*** and ***long term*** for the operational phase. Therefore, the residual impact of the proposed Project on ambient air quality is deemed to be ***imperceptible***.

Having regard to the foregoing, the effect of air quality and climate impacts arising from the proposed development during the operational phase is ***not significant***.

5.5 NOISE AND VIBRATION

5.5.1 Construction Phase

During the construction phase it is expected that there will be some temporary impact on the nearest residential properties on Mount Carmel Park and Sally Park House/Nursing Home due to noise emissions from the plant equipment required for construction. The magnitude of noise generated will be dependent on a number of factors including the proximity of noise sensitive receptors, construction methods employed, the selection of plant and the construction programming. A variety of items of construction methods and plant items will be required during the various phases of the construction project. Noise will be generated primarily from the onsite construction activity however noise can be generated during haulage of construction and waste materials to and from site.

The potential for noise and vibration effects in the absence of mitigation on the can be characterised as ***negative***, ***moderate to significant***, and ***short term*** for the construction phase.

There is no published statutory Irish guidance relating to the maximum permissible noise level that may be generated during the construction phase of a project.

The application of avoidance measures, such as binding hours of construction, along with implementation of appropriate noise and vibration control measures, will ensure that noise and vibration impact will not be excessively intrusive. Any impacts will be short term in duration for the construction phase. The CEMP sets out minimisation measures to ensure nuisance noise arising from demolition, site clearance and construction activities is prevented where possible and managed in accordance with best practice and any subsequent planning conditions relevant to the proposed development.

The relevant mitigation measures are set out in the CEMP including:

- Hours will be limited during which noisy site activities are permitted.
- Channels of communication will be established between the Contractor/Developer, Local Authority and Residents.
- A Site Representative will be appointed responsible for matters relating to noise.
- Typical levels of noise will be monitored during critical periods and at sensitive locations.
- Plant will be selected with low inherent potential for the generation of noise.
- All site roads will be kept even so as to mitigate the potential for vibration from lorries.
- Barriers will be erected as necessary around items such as generators or heavy duty compressors.
- Noisy plant will be sited as far away from sensitive properties as permitted by site constraints.
- Engines, vehicles and equipment will be switched off when not in use.
- Significant sources of noise will be enclosed.
- Plant will be used and serviced regularly in accordance with manufacturer's instructions.
- Cranes will be shut down during work periods / throttled to minimum when not in use.
- Machinery having rotating parts will be serviced according to supplier recommendations to prevent friction induced sound.
- Materials should be lowered, not dropped, insofar as practicable and safe.

All personnel must be made aware that noisy construction activities resulting in significant noise levels must be minimised and made aware of the above control measures. During the construction stage the following codes and regulations will be adhered to:

- BS 5228:2009 Code of Practice for Noise and Vibration Control on Construction and Open Sites, Part 1 and Part 2;
- SHWW (General Application) Regulations 2007 – 2016, Part 5 Noise and Vibration

Noise and vibration effects on the environment following the implementation of standard construction mitigation measures, as set out in the CEMP, the residual impact can be characterised as ***negative***, ***slight to moderate,*** and ***short term*** for the construction phase.

Having regard to the foregoing, the effect of noise and vibration impacts arising from the proposed development during the construction phase is ***not significant***.

5.5.2 Operational Phase

The operation of the proposed development will remain consistent with the type of activity and buildings the vicinity of the proposed development site. A range of mechanical plant items will be required to service the development. While the specific details of the plant items would normally be confirmed at the detail design stage of a project, typically for residential and commercial developments, there will be a requirement to provide mechanical plant for ventilation, heating and cooling purposes. Mechanical plant serving these purposes may include air handling units, chillers, condensers, boilers and fans of various types and sizes. Whilst there is potential for

these plant items to generate moderate to significant noise levels, mitigation at the design stage can effectively eliminate potential noise impacts associated with these plant items.

The best practice method for measuring and assessing building services plant noise emissions is outlined in the British Standard BS4142:2014+A1:2019 Methods for Rating and Assessing Industrial and Commercial Sound. BS4142:2014+A1:2019 describes methods for rating and assessing sound of an industrial and/or commercial nature. The methods described in this British Standard use outdoor sound levels to assess the likely effects of sound on people who might be inside or outside a dwelling or premises used for residential purposes upon which sound is incident.

It will be necessary that the cumulative noise levels from all plant associated with the proposed development be specified and designed to ensure that specific plant noise levels do not exceed 10 dB above the prevailing background noise levels at the nearest noise sensitive location, as well as any additional measures required pursuant to planning conditions which may be imposed. In addition, due care should be taken to ensure that the selected mechanical plant does not generate any potential tonal or impulsive noise.

The proposed development will give rise to additional road traffic on public roads., additional traffic from residential developments can give rise to slight to moderate impacts in respect of noise.

The residual effects on noise and vibration are ***neutral***, ***imperceptible***, and ***long term*** for the operational phase.

Having regard to the foregoing, the effect of noise and vibration impacts arising from the proposed development during the operational phase is ***not significant***.

5.6 LANDSCAPE AND VISUAL IMPACT

5.6.1 Construction Phase

The change of use of the site from its existing use to that of a construction site, i.e. the clearance of the site and the construction of the buildings, will give rise to short term and substantially localised effects on landscape character. This effect will be seen through the introduction of new structures, machinery, ancillary works, associated hoarding, scaffolding and cranes etc.

Measures will be undertaken to mitigate any potentially adverse construction-related effects on immediately adjoining neighbours, particularly on the residents of the existing Mount Carmel Park and Sally Park House/Nursing Home. Operation of a well-managed organised and planned construction site, with adequate control of construction traffic and working activity, will be undertaken which is key to avoiding and minimising impact. A full list of mitigation measures for the construction phase can be found in the Visual Impact Assessment (VIA) (2023) prepared by Doyle + O'Troithigh Landscape Architects.

The VIA has undertaken and assessment of the potential impact during the construction phase from 12 representative photomontage view location that have been prepared by Digital Dimensions. With reference to the VIA prepared by Doyle + O'Troithigh Landscape Architects this demonstrates that the residual impact on landscape and visual impact during construction will be ***short term*** and will be ***slight to moderate*** and ***negative***. There is no likelihood of significant effects on the

environment arising from the proposed development in respect of landscape and visual impacts during the construction phase.

5.6.2 Operational Phase

The initial impact of the built development on the landscape character would be perceived as negative in the short-term due to the change in type from a 2-storey to a 3-5 storey to a built development. The proposed development is consistent with the land use zoning designation and with the wider residential setting. In keeping with this context the proposed development, while having slight to moderate effects, can be successfully integrated and absorbed into the landscape and townscape and will not give rise to any significant landscape and visual effects. The design and layout of the proposed development is appropriate in terms of the existing site character, zoning and context. Once the development is completed, consistent and effective maintenance of hard and soft landscape areas, (in particular entrance areas, open space area and walkways) together with quality site and building management are key to avoiding or minimising negative landscape and visual impacts arising from the operation of the proposed development given the location of the site to the south of the Dodder Valley Park.

The VIA has undertaken and assessment of the potential impact during the construction phase from 12 representative photomontage view location that have been prepared by Digital Dimensions. With reference to the VIA (2023) prepared by Doyle + O'Troithigh Landscape Architects this demonstrates that the residual impact on landscape and visual impact during construction will be ***long term***, and range from ***imperceptible to moderate*** and ***negative to neutral***. There is no likelihood of significant effects on the environment arising from the proposed development in respect of landscape and visual impacts during the operational phase.

5.7 CULTURAL HERITAGE, AND ARCHAEOLOGY

5.7.1 Construction Phase

A review of the Heritage Council's online database (https://heritagemaps.ie/) determined that there are no recorded archaeological sites or monuments within the proposed development lands. In addition, a review of the SDCC Development Plan 2022 – 2028 confirms that there are no protected structures within the proposed development lands.

An Archaeology Impact Assessment (AIA) and Method Statement (2021)has been prepared by Archaeology & Heritage Consultancy Limited.

Theis assessment outlines that proposed development area falls within the Zone of Archaeological Potential associated with Sally Park House (DU022-103----) as recorded on the Record of Monuments and Places. However, as the site is recorded as '*House - 18th/19th century*' on the Sites and Monuments Record, the possibility of any physical elements of the RMP site extending into the proposed development area are negligible.

AIA considers that any impacts on Sally Park House are deemed to be indirect, in the form of impacts on the visual amenity.

The AIA identifies that there are no known archaeological sites within the red line boundary of the development. However, the townland boundary which runs along the

northern side of the site, is noteworthy. It takes the form of a well-constructed and well-maintained rubble and cement built wall.

See AIA and Method Statement (2021) prepared by Archaeology & Heritage Consultancy Limited for further detail.

The Archaeological Method Statement Section 8 recommends that a Level 2 Archaeological Survey be undertaken to record the 'Smithy' building, prior to its removal. Furthermore, it is anticipated that a condition on grant of permission would require that the applicant engage the services of a fully licenced archaeologist to coordinate and implement the Archaeological Method Statement in consultation with the National Monuments Service. A method statement for the proposed works arising from the on-going additional archaeological testing will be agreed with the National Monuments Service, Department of the Culture, Heritage and the Gaeltacht in advance of the commencement of construction work.

Refer to the AIA and Method Statement (2021) prepared by Archaeology & Heritage Consultancy Limited for more information procedures in the instance of the discovery of archaeological remains.

As the site has been previously developed it is unlikely that the proposed development will uncover potential as yet unknown sub-surface archaeological features on the site.

While it is acknowledged that the proposed development works have the potential to have ***direct, negative*** and ***profound impacts*** on unknown sub-surface features. The implementation of the Archaeological Method Statement would mean that the residual impacts to Archaeology and Cultural Heritage would be ***neutral, imperceptible*** and ***long term.***

Having regard to the foregoing, the effect of culture, heritage and archaeology impacts arising from the proposed development during the construction phase is ***not significant***.

5.7.2 Operational Phase

The operational phase of the proposed development is not predicted to have any impact on archaeological, architectural and cultural heritage.

In this regard any impacts upon cultural heritage and archaeological are considered to be ***neutral, imperceptible*** and ***long term*** in nature.

Having regard to the foregoing, the effect on culture, heritage and archaeology arising from the proposed development during the operational phase is ***not significant***.

5.8 TRAFFIC AND TRANSPORTATION

5.8.1 Construction Phase

During the construction phase of the proposed development, there will be additional traffic movements to/from the site from construction personnel, security staff, professional staff (i.e. design team, utility companies), excavation plant, dumper trucks and deliveries/removal of materials (waste/spoil).

In order to transport construction material to the site in the most efficient and environmentally sensitive manner appropriate routes need to be identified. Having

considered the site location it is proposed that the most appropriate route to the site for material and plant delivery will be via Junction 12 off the M50 which serves both Northbound and Southbound traffic. From Junction 12 along the Killininny Road and north along the Ballycullen Road will be the most direct for all deliveries including Oversized (under specific licence), which is an overall distance of 1.7 kilometres.

The frequency of vehicles accessing the site will vary throughout the construction phase. A site-specific construction traffic management plan incorporating the mitigation measures set out under the CEMP will be prepared by the contractor and submitted to the planning authority prior to the commencement of construction. After the implementation of mitigation measures the potential impact on Traffic and Transportation are ***negative*** and ***short term*** for the construction phase.

Having regard to the foregoing, the effect of traffic and transportation impacts arising from the proposed development during the construction phase is ***not significant***.

5.8.2 Operational Phase

The proposed scheme will see an increased level of traffic coming to and from the site when compared to the existing situation.

Traffic Insights have undertaken a Traffic and Transport Assessment (TTA) (2023) to assess operational traffic flows from the proposed development. This concluded (Section 7 of the TTA) that the percentage change in traffic through the assessed junctions due to traffic generated by the proposed development during both peak hours in the development's assumed year of opening is projected to result in:

- an increase of 4.7% and 4.6% through the 3-arm Site Access/ Firhouse Road junction in the AM and PM peak hours respectively; and
- an increase of 1.4% through the 4-arm Firhouse Road/ Ballycullen Road/ Mount Carmel Park signalised junction in both the AM and PM peak hours.

The TTA states that due to the low additional traffic generated at both junctions assessed, i.e. no more than 5% additional traffic in any assessment year, more detailed analysis in the form of traffic modelling has not been deemed necessary in support of the proposed development.

A set of modal share targets have been established for the Residential Travel Plan (RTP), with an Action Plan subsequently developed for the proposed development with a view to meeting these targets and facilitating and incentivizing sustainable mobility choices among future residents. The RTP implementation will be continually overseen and managed by an appointed Travel Plan Coordinator (TPC), with a range of proposed measures to support cycling, walking and public transport. The Framework RTP is complemented by a Car Parking Management Plan, which is set out in Section 9 of the Traffic and Transport Assessment (2023), setting out the proposed car parking allocation rules, monitoring and enforcement protocols.

The requirements on the current infrastructure are considered to be consistent with the site's zoning objective and the proportionate proposed bicycle parking provision will ensure sustainable modes of transport are promoted.

On the basis of the above the potential effects on Traffic and Transportation are considered to be ***negative***, ***moderate***, and ***long term*** for the operational phase.

Having regard to the foregoing, the effect of traffic and transportation impacts arising from the proposed development during the operational phase is ***not significant***.

5.9 MATERIAL ASSETS, INCLUDING WASTE MANAGEMENT

5.9.1 Construction Phase

Utilities: Foul Sewer, Stormwater and Potable Water

The proposed development will have an impact upon other material assets such as 'built services and infrastructure' (set out in the EPA Guidelines 2022) such as electricity, telecommunications, gas and water supply.

Welfare facilities (canteens, toilets etc.) will be available within the construction compound and this will remain in place for the construction of the proposed development. The offices and site amenities will initially need to have their own power supply (generator), water deliveries and foul water collection until connections are made to the mains networks.

Electrical connections will be made by suitably qualified personnel following consultation with the relevant authorities and will be cognisant of subsequent construction works. High voltage connections will be established for heavy duty equipment and site facilities, as required. All electrical works, including connection to the ESB network will be carried out by a suitably qualified contractor. The power and electrical supply requirements during construction are relatively minor, and there is no potential impact anticipated on existing users.

Water supply required for welfare facilities, dust suppression and general construction activities will be sourced from the existing public piped supplies running into the site. Although before connections are established to the water supply it may need to be trucked onto site. As with electrical works, this will be carried out by a suitably qualified contractor. It will be necessary to service the site with a reliable and safe water supply.

Site welfare facilities will be established to provide sanitary facilities for construction workers on site. The main contractor will ensure that sufficient facilities are available at all times to accommodate the number of employees on site. Foul water from the offices and welfare facilities on the site will discharge into the existing sewer on site (the cabins may initially need to have the foul water collected by a licensed waste sewerage contractor before connection to the sewer line can be made).

In respect of the foregoing, the predicted impacts upon foul sewer, stormwater and potable water are considered to be ***neutral, imperceptible*** and ***short term*** in nature.

Waste and Waste Management

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 (See Section 3.5). The scale of the waste production in conjunction with the use of licensed waste disposal facilities and contractors does not cause concern for likely significant effects on the environment.

The accompanying CWMP prepared by PHM Consulting details the methodologies employed for the control, management, monitoring and disposal of waste from the site. The plan sets out the measures used is to maximise the quantity of waste recycled by

providing sufficient waste recycling infrastructure, waste reduction initiatives and waste collection and waste management information to the residents of the development.

Other than waste generated from materials necessary for the construction of the building the proposed development will not produce significant volumes of waste.

All waste arising during the construction phase will be managed and disposed of in a way that ensures the provisions of the Waste Management Act 1996 as amended and associated amendments and regulations and the Waste Management Plan. In the event, there is excess material with no defined purpose, it will be transported to an authorised soil recovery site or notified to the EPA as a by-product when it will be beneficially used.

Waste during construction will be managed in accordance with a project specific Resource and Waste Management Plan, as well as any subsequent planning conditions.

When material is removed off-site it could be reused as a by-product (and not as a waste). If this is done, it will be done in accordance with Regulation 27 of the *European Communities (Waste Directive) Regulations 2011*, which requires that certain conditions are met and that by-product notifications are made to the EPA via their online notification form. Excavated material should not be removed from site until approval from the EPA has been received. The potential to reuse material as a by-product will be confirmed during the course of the excavation works, with the objective of eliminating any unnecessary disposal of material.

Site investigations and environmental soil testing will be undertaken after demolition has taken place and prior to the removal of any excavated material from the proposed development site. All waste soils prior to being exported off-site, shall be classified as inert, non-hazardous or hazardous in accordance with the EPA's Waste Classification Guidance – List of Waste & Determining if Waste is Hazardous or Non-Hazardous document dated 5th July 2018 to ensure that the waste material is transferred by an appropriately permitted waste collection permit holder and brought to an appropriately permitted or licensed waste facility. A carefully planned approach to waste management as set out in Section 3.5 will ensure that the impact on the environment will be ***short-term, neutral*** and ***imperceptible***.

Having regard to the foregoing, the effect of material assets impacts arising from the proposed development during the construction phase is ***not significant***.

5.9.2 Operational Phase

Utilities: Foul Sewer, Stormwater and Potable Water

The proposed development will have an impact upon other material assets such as 'built services and infrastructure' (set out in the EPA Guidelines 2022) such as electricity, telecommunications, gas and water supply. The likely impact is considered to be consistent with the site's zoning objective as set out in the South Dublin County Council Development Plan 2022-2028 and is typical of a development at an urban location.

A Pre-Connection Enquiry (reference CDS23004453) was submitted to Uisce Éireann to determine the feasibility of connecting to the public water supply and drainage infrastructure. A response was received from Uisce Éireann on July 3rd, 2023

confirming feasibility without the need for infrastructure upgrades by Uisce Éireann. Further information is set out in the accompanying Water Services Report (2023).

The proposal will have an impact on servicing and utilities infrastructure in the area, requiring connections to water, electricity, and gas supplies, as well as connecting to the existing road network. Due to the brownfield nature of the site, the development is well placed to benefit from in-situ infrastructure provision and will therefore constitute a sustainable use at the location. Further information is set out in the accompanying Water Services Report (2023).

Water supply and wastewater will be provided via the existing public mains network adjacent to the site. The disposal of foul water from the site will be separated from that of surface water.

In respect of the foregoing, the predicted impacts upon foul sewer, stormwater and potable water are considered to be ***neutral, imperceptible*** and ***long term*** in nature.

Waste and Waste Management

The proposed development will give rise to a variety of waste streams during the operational phase, i.e., when the project is completed, and fully operational. The majority of waste will be generated by the residents living in the apartment blocks and the commercial tenants during the fully operational stage.

An Operational Waste Management Plan (2022) has been prepared by OCSC, which will outline measures to maximise the quantity of waste recycled by providing sufficient waste recycling infrastructure, waste reduction initiatives and waste collection and waste management information to the residents and tenants of the development.

During the operational phase, a structured approach to waste management as set out will promote resource efficiency and waste minimisation. Provided the mitigation measures are implemented and a high rate of waste prevention, reuse, recycling and recovery is achieved, the predicted impact of the operational phase on the environment will be ***long-term, neutral*** and ***imperceptible***.

Conclusion

There are no likely significant environmental effects in terms of the material assets, for the proposed development and considering the existing environment and proposed future environment which would warrant preparation of an EIA.

Having regard to the foregoing, the effect of material assets impacts arising from the proposed development during the operational phase is ***not significant***.

5.10 POTENTIAL IMPACTS FROM INTERACTIONS

This section discusses the potential interactions and inter-relationships between the environmental factors discussed in the preceding sections. This section covers both the construction and operational phase of the proposed development.

In accordance with the guidance not only are the individual significant impacts required to be considered when assessing the impact of a development on the environment, but so must the interrelationships between these factors be identified and assessed.

The majority of the interactions that are considered to have a neutral effect (i.e., no effects or effects that are imperceptible, within the normal bounds of variation or within the margin of forecasting error).

There is a potential interaction between land, soil geology, hydrogeology and hydrology through poorly managed surface water run-off during the construction phase of the proposed development.

There is a potential for interactions between air quality during construction activities on human health and biodiversity via dust generation. There is a potential for interactions between noise and vibration during construction activities on human health.

However, these potential interactions are short-term and associated with the construction phase. The CEMP has outlined minimisation measures to ensure that pollution and nuisances arising from demolition, site clearance and construction activities is prevented where possible and managed in accordance with best practice and any subsequent planning conditions relevant to the proposed development.

Having regard to the foregoing, the effect of potential impacts from interactions arising from the proposed development during the construction phase is ***not significant***.

It is considered that there will be no likely significant interactions which require preparation of an EIAR.

5.11 POTENTIAL CUMULATIVE IMPACTS

As part of the assessment of the proposed development, the likelihood of potential cumulative impact of the proposed development has been considered with any future development (as far as practically possible) and the cumulative impacts with developments in the locality (including planned and permitted developments).

The National Planning Application Map was consulted for the previous 5 years to identify notable applications (proposed development), or applications granted permission (permitted development) within that period within 500 m of the development site. The National Planning Application Map includes planning application data sourced from the 31 individual local authorities across Ireland. This list of consented development is shown in Appendix A at the end of this report. The review of the online planning tool noted a large number of insignificant small extensions, changes of use, retention and other minor alterations in the vicinity of the proposed development. These proposed and consented development have been, where relevant, considered as a part of the overall project impact.

Cumulative impacts are those impacts that relate to incremental / additive impacts of the planned development in addition to historical, present or foreseeable future actions. Cumulative impacts can be thought of as occurring through two main pathways: first, through persistent additions or losses of the same materials or resource, and second, through the compounding effects as a result of the coming together of two or more effects.

Mitigation is included in the project design to minimise impacts on the receiving environment. Each project currently permitted in the wider area is subject to planning conditions which include appropriate mitigation measures to minimise environmental impacts. Provided that mitigation measures for other developments are implemented as permitted, there will be no significant cumulative effects.

Any future development will be required to incorporate appropriate mitigation measures (e.g. noise management, dust management, traffic management, management of water quality in run-off water, landscape, etc) during the construction phase as such any cumulative development will not have a significant effect on human health, material assets, land, soils, geology, hydrogeology, and hydrology.

Any future development proposed on the surrounding lands should be cognisant with the zoning and will be subject to EIA and/or planning conditions which include appropriate mitigation measures to minimise environmental impacts.

Having regard to the foregoing, the effect of potential cumulative impacts arising from the proposed development and the surrounding developments being constructed concurrently is ***not significant***.

Based on the assessment of the environmental sensitivities in the existing environment and consideration of potential cumulative impacts, it is concluded that there are no likely cumulative environmental impacts which would warrant preparation of an EIA.

6.0 FINDINGS AND CONCLUSIONS

The purpose of this EIA Screening Report has been to consider whether there is a requirement for the preparation of an Environmental Impact Assessment Report (EIAR) to accompany the Large Scale Residential Development application to SDCC, and to provide SDCC with the information required under Schedule 7A of the Planning and Development Regulations 2001, as amended, to enable SDCC to determine in light of the criteria set out under Schedule 7 of those regulations whether the proposed development is likely to have significant effects on the environment. If SDCC determines that the proposed development is not likely to have significant effects on the environment, the request can be determined without an Environmental Impact Assessment Report (EIAR) having been submitted.

The proposed development and component parts have been considered against the thresholds outlined in Schedule 5, Part 2 Class 10 (a) to (m).

On the basis of the evaluation set out in Section 2.0 an EIA for the proposed development is not mandatory. The proposed project is considered to be a sub-threshold development and therefore, SDCC is required to assess whether the proposed development is likely to have significant effects on the environment in order to determine whether the submission of an EIAR is required. The information necessary to enable this screening assessment has been provided in this report and the methodology used has been informed by the available guidance, legislation and directives.

It is concluded having regard to the nature, scale and location of the subject site, that there is no likelihood of significant effects as a result of the proposed development on the environment (direct, indirect or cumulatively with other development) and therefore it is considered that an environmental impact assessment report is not required in this instance.

AWN has considered the proposed development and assessed the potential for significant environmental effects and the need for an EIAR is documented Sections 3.0, 4.0 and 5.0.

AWN has concluded that there are no likely significant effects on the environment for the proposed development, so the preparation of an EIAR is not required. A mandatory EIAR is not required for the proposed development, and as there is no likelihood of significant effects on the environment. It is submitted by AWN that there is not a requirement for an EIAR to be submitted with this planning application.

7.0 REFERENCES

Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report, European Commission, 2017 http://ec.europa.eu/environment/eia/eia-support.htm

Guidelines on the Information to be contained in Environmental Impact Assessment Reports. (2022). Environment Protection Agency.

Guidelines for Planning Authorities and An Bord Pleanala on carrying out Environmental Impact Assessment. Department of Housing, Planning and Local Government. DHPLG: 2018.

Water Services Report for Firhouse Inn Strategic Housing Development Firhouse Road, Dublin 24. PHM Consulting. 2023.

Construction Environmental Management Plan - Firhouse Inn Strategic Housing Development Firhouse Road, Dublin 24. PHM Consulting. 2023.

Construction Waste Management Plan - Firhouse Inn Strategic Housing Development Firhouse Road, Dublin 24. PHM Consulting. 2023.

Bat survey of Firhouse Inn and adjacent buildings, Dublin 24. Flynn Furney Environmental Consultants. 2023.

Firhouse Inn Development: Ecological Impact Assessment Report. Flynn Furney Environmental Consultants. 2023.

Screening for Appropriate Assessment Firhouse Inn Redevelopment. Furney Environmental Consultants. 2023.

Archaeological Impact assessment and method statement for a proposed SHD development at The Firhouse Inn, Firhouse Road Dublin 24. Archaeology and Heritage Consultancy Ltd. 2021.

Operational Waste Management Plan Firhouse, Firhouse Road, Dublin 24. O'Connor Sutton Cronin (OSCS). 2022.

Traffic and Transport Assessment. Transport Insights. 2023.

Landscape and Visual Impact Assessment. Doyle + O'Troithigh Landscape Architecture. 2023.

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APPENDIX A - RELEVANT PLANNING HISTORY

Application Number	Development Description	Development Address	Decision	Grant Date
SHD3ABP-313777-22	Demolition of all existing structures on site (c. 1,326 sq m), including: Two storey building formally used as public house, ancillary off-licence and associated structures (c. 972 sq m); Two storey building comprising an existing barber shop and betting office (c. 260 sq m); Single storey cottage building and associated structures (c. 94 sq m); and Eastern boundary wall and gated entrance from Mount Carmel Park. The development with a total gross floor area of c. 11,638 sq m, will consist of 100 residential units arranged in 2 blocks (Blocks 01 and 02) ranging between 3 and 5 storeys in height, over lower ground floor and basement levels, comprising: 96 apartments (consisting of 2 studio units; 45 one bedroom units; 10 two bedroom (3 person) units; 34 two bedroom (4 person) units; and 5 three bedroom units), together with private (balconies and private terraces) and communal amenity open space provision at podium and roof levels; and 4 duplex apartments (consisting of 2 one bedroom units and 2 two bedroom units (4 person) located within Block 01, together with private balconies and terraces. Also included is non-residential uses (c. 355 sq m), including: 1 café (c. 58 sq m) and 1 office (c. 30 sq m) located at ground floor level of Block 01; 1 medical unit (c. 59 sq m) and 1 betting office (c. 66 sq m) located at ground floor level of Block 02; 1 barber shop (c. 28 sq m) located at ground floor level between Blocks 01 and 02; and 1 crèche (c. 114 sq m) located at lower ground floor level of Block 01 and associated outdoor play area to the rear. Vehicular access to the site will be from the existing access off Firhouse Road. The proposal includes minor alterations to the existing access, including the provision of new and enhanced pedestrian infrastructure. The development will also consist of the provision of public open space and related play areas; hard and soft landscaping including internal roads, cycle and pedestrian routes, pathways and boundary treatments, street furniture, basement car parking (80 spaces in total, including accessible spaces); motorcycle parking; electric vehicle charging points; bicycle parking (long and short stay spaces including stands); ESB substations, piped infrastructural services and connections to existing public services, (including relocation of existing surface water sewer and water main from within the application site onto the public roads area along Firhouse Road and	Mortons, The Firhouse Inn, Firhouse Road, Dublin 24, D24 YYR4	DECISION PENDING	N/A

	Mount Carmel Park); ducting; plant; waste management provision; SuDS measures; stormwater management and attenuation; sustainability measures; signage; changes in levels; public lighting; and all ancillary site development and excavation works above and below ground. The application contains a statement setting out how the proposal will be consistent with the objectives of the South Dublin County Council Development Plan 2016-2022 and the South Dublin County Development Plan 2022-2028. The application contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000, as amended, notwithstanding that the proposed development materially contravenes the South Dublin County Council Development Plan 2016-2022 and the South Dublin County Development Plan 2022-2028 other than in relation to the zoning of the land.			
SD23A/0335	Expansion of the existing National Basketball Arena by means of the demolition of the existing structure for the construction of a new multi-functional facility comprising of, main hail sized to allow for 4 full size basketball courts; Deployable seating for a FIBA International Rated basketball court with a capacity for 3272 spectators; all with changing and sanitary facilities to match; Entrance Foyer with access to ancillary café/shops; sports' governing-body offices; Corporate facilities with 1st floor roof terrace and with related kitchen; Gym; staff areas, and associated storage & maintenance facilities; This is to be housed in a part single! part two storey/part three storey structure with a gross internal area of c.7913.3 sq.m, with a projecting canopy along North and East elevations; The Main Hall has a gross floor area of c.2,934 sq.m designed to flexibly accommodate a range of activities/sports; The overall primary dimensions of the proposed structure are c.89m by c.59m (with various projections/ recesses) and a primary height of c.12.70m. (with variations down to c 5.50m); Permission is also sought for carpark area with 260 staff and visitor car parking spaces; Coach parking; bicycle parking; ancillary services area; drainage works; landscaping works including paving, planting, earth mounding, and SuDs; Canopy mounted signage and associated site development works on a site area of 1.713 Ha.	National Basketball Arena, Tymon Lane, Dublin 24, D24 N449	PERMISSION APPLICATION SUBMITTED	N/A
SD23A/0304	The development will consist of a GAA Cluster Facility including: a) 3 no. floodlit GAA pitches (Pitches No's 1., 3. & 4.) comprising; Pitch no. 1, a sand-based grass pitch (145m x 90m) with floodlights with a lux level of 500 mounted on 7 no. 21.4m high columns;	Townlands Of Tymon North And Templeogue, Spawell Golf and Leisure Centre, Templeogue, Dublin 6W, D6W PY06	PERMISSION APPLICATION SUBMITTED	N/A

	Pitch no. 3, a sand-based grass pitch (140m x 90m) with floodlights with a lux level of 350 mounted on 6 no. 21.4m high columns; Pitch no. 4, a synthetic all weather pitch (140m x 90m) with floodlights with a lux level of 350 mounted on 6 no. 21.4m high columns; All pitches will have GAA goal posts and ball stop netting to rear of same, (90m x 16m in height to the eastern end of Pitch no. 1 and Pitch no. 4 and 30m x 16m in height elsewhere) electronic scoreboards and 2 dugouts each, a railing around the perimeter of each of the sand-based pitches and 2.4m sports fencing around the perimeter of the all-weather pitch. b) The provision of floodlighting for Pitch no. 2, which is under construction (Ref. ED 19/0005) with floodlights with a lux level of 350 mounted on 6 no. 21.4m high columns); Three floodlight mountings serving Pitch no. 2 are on three shared columns also serving Pitch no. 3. c) The construction of a single storey Pavilion building (2050 m2) to provide 10 no. team changing rooms, showers and toilets, male and female officials changing rooms, kitchen preparation and service area, dining / multi-purpose room, team meeting room, gymnasium / weights room, medical room, physio room, first aid room, storage, tuck shop, reception, cleaning supplies room, office, changing places room, male WC, female WC, unisex WC, foyer/ entrance lobby and plant room. The Pavilion building will include photovoltaic panels on the roof and associated heat pump enclosure. d) the provision of a separate Indoor Training Facility including a 20m x 30m pitch. (600m2) e) Maintenance garage (200 m2) adjoining Indoor Training Facility building. f) the construction of a spectator stand to the south of Pitch no. 1 to accommodate 500 seated spectators with roof/cover, with Public Toilets (male and female) and equipment storage and plant located in undercroft of the stand. g) a 500 person uncovered terraced spectator stand, on the south of Pitch no. 1 consisting of two separate 250 person terraces either side of the main spectator stand h) Hurling wall, 5m in height and 105m in total length on two sides of an all weather hurling practice area / warm up area (40m x 65m) and also including 2.4m high fence and floodlights with a lux level of 300 mounted on 4 no. 18m high columns.			

	i) a sprint training area of synthetic all weather surface adjoining the hurling warm-up area. j) Plaza area; space between Pitches no. 1, 3 & 4, and Pavilion Building with hard and soft landscaping including permeable paving areas. k) a walking/jogging trail (1.32km) with outdoor exercise equipment within the perimeter of site, l) a proposed new signalized junction roadway and pedestrian/ cyclist access onto Wellington Lane at its junction with Rossmore Road; m) 112 car parking including 84 no. standard car parking spaces, 5 no. universal access spaces, 23 no. electric vehicle parking spaces with associated charging points and the provision of an additional 55 no. overflow spaces for intermittent use with a grasscrete finish, 4 no. coach spaces and bicycle stands for the parking of 161 no. bicycles. n) demolition of the driving range bays (820 m2), at Spawell Golf Academy. o) demolition of part of Indoor soccer pitch facility (296 m2 area to be demolished) at Spawell Leisure Centre. p) removal of part of outdoor soccer pitch (326 m2 area to be removed) at Spawell Leisure Centre. q) demolition of 1 no. maintenance shed (34 m2) at Spawell Leisure Centre. r) SuDS Measures including a combination of stone-attenuation beds within pitches, tree pits, permeable overflow parking surface, permeable paving to plaza area, grassed swales and channels. s) an ESB substation and 2 no. switch rooms, housed in one structure of overall area 57m2. t) site clearance to include removal of trees and vegetation. In addition, the development will include; u) Earthworks, drainage infrastructure and attenuation, retaining structures, signage, landscaping, security fencing / boundary treatment, bin storage, and all other associated site development works above and below ground level. A Natura Impact Statement (NIS) will be submitted to the planning authority with this application.			

SD20A/0140	Construction of 2 grass playing pitches: pitch No.1 will measure some 145m long by 90m wide and pitch No.2 will measure some 133m long by 80m wide; club facilities including 4 changing rooms measuring 51sq.m each; storage facilities; function rooms; meeting rooms; physiotherapy facilities; kitchen facilities; wc and circulation space; site works include removal of existing hedgerows and trees; replanting areas; formation of a new pedestrian and vehicular entrance on Firhouse road; 67 car parking spaces; 24 bicycle spaces; perimeter pathway; fencing and attendant landscaping works.	Lands adjacent to Carmel of the Assumption Convent, Firhouse Road, Firhouse, Dublin 24	GRANT PERMISSION	08/06/2021
SD16A/0444	Retention of change of use of 2 storey family flat granted under S01A/0574 to a separate dwelling and permission for works to front garden	8, Brookmount Lawns, Tallaght, Dublin 24	GRANT PERMISSION & GRANT RETENTION	21/02/2017
SD19B/0164	Construction of a double storey extension to the rear; internal alterations; vehicular entrance.	19, Mount Carmel Park, Firhouse, Dublin 24	GRANT PERMISSION	14/06/2019
SD21B/0217	Ground & first floor extension at rear to replace single storey structure plus attic conversion into non-habitable space along with porch extension to front	10, Mount Carmel Park, Dublin 24	GRANT PERMISSION	09/06/2021
SD17A/0279	Demolition of existing garage and construction of semi-detached two-storey, three bedroom dwelling house with new vehicular entrance and associated landscaping, boundary and site development works.	Side of 1, Mount Carmel Park, Knocklyon, Dublin 24, D24 E9T4	GRANT PERMISSION	14/02/2018
SD20B/0120	Retention permission for a single storey extension to rear of existing house (Protected Structure).	14, Homeville Court, Ballycullen Road, Dublin 16	GRANT PERMISSION FOR RETENTION	16/07/2020
SD18B/0452	Demolition of rear conservatory and chimney and construction of a 2 storey rear extension with flat roof over; alterations to porch door and side windows; window in gable wall at first floor; internal alterations at ground floor and first floor and associated site works.	The Beeches, Firhouse Road, Knocklyon, Dublin 16.	GRANT PERMISSION	19/12/2018
SD13B/0055/EP	Demolition of existing single storey garage to the side (12sq.m); construction of a new two storey extension to the side with a rooflight and construction of a new single storey extension to the rear with rooflights (totalling 62sq.m).	34, Delaford Park, Dublin 16	GRANT PERMISSION OF DURATION OF PERMISSION	26/7/2018
SD18A/0372	(a) 3 storey permanent primary school building containing 16 en-suite classrooms, 1 general purpose room, 1 library/resource room, 1 multi-purpose room, 3 special education tuition rooms, all associated staff and pupil ancillary accommodation/facilities, roof garden, PV solar panels on the south facing pitched roofs and external building signage; (b) 2 ball courts with associated perimeter fencing; (c) junior play areas; (d) car parking for staff and visitors; (e) formation of a drop off bay for	Gaelscoil Chnoc Liamhna, Knocklyon Road, Dublin 16.	GRANT PERMISSION	5/12/2018

	10 cars, relocation of pedestrian crossing and provision for new pedestrian crossing, all on the Knocklyon Road; (f) realignment of access road and junction from Knocklyon Road including provision for new and realigned footpaths including shared cycle/pedestrian paths to both north and south of the junction; (g) all associated site works including boundary walls/fencing with signage, entrance gates, connection to public storm drainage via an attenuation system, connection to public foul drainage at Delaford Ave, public lighting, bike shelter, landscaping and temporary site compound.			
SD21B/0154	Proposed ground floor side extension with pitched roof over with 2 roof lights.	2, Old Knocklyon Road, Knocklyon, Dublin 16	GRANT PERMISSION	15/6/2021
SD17B/0316	New detached single storey structure located to the rear of the existing rear garden and to be used as a utility/dry room area, gym/recreation area with a toilet/shower room, external finishes to match existing and associated site works.	11 Monalea Park, Firhouse, Dublin 24.	GRANT PERMISSION	2/11/2017
SD18B/0405	Extend the existing concrete ridge tiles & roof tiles to form a new 'Dutch' type roof structure, extend side structure up to new soffit level with two additional windows in the existing gable wall, dormer roof structure to the existing rear tiled roof with attic conversion, internal alterations, front porch, single storey extension to the rear of the dwelling, external finishes to match existing and associated site works.	39, Monalea Park, Dublin 24	GRANT PERMISSION	21/11/2018
SD20A/0294	Room extension at the western end of the main school building. The works will involve the demolition and removal of the existing prefabricated Resource Room structure.	Scoil Carmel Junior National School, Firhouse Road, Dublin 24	GRANT PERMISSION	18/1/2021
SD19A/0106	Demolition of 42sq.m including the entrance lobby, reception area and adjacent office; construction of extension of 140sq.m; fenestration and emergency egress doors; decorative cladding to exterior; logo and signage to facade; minor works associated with interior alterations; the works to the Community Enterprise Hall building include new fenestration and emergency egress doors; decorative cladding to exterior; logo and signage to facade; minor works associated with interior alterations; bicycle shelter; hard and soft landscaping and all associated site works.	Bolbrook Enterprise Centre, Avonmore Road, Tallaght, Dublin 24	GRANT PERMISSION	5/9/2019

SD20A/0323	Amend granted planning permission SD19A/0106 from current tea/coffee station to an artisan coffee shop with an area of 140sq.m encompassing an internal seating and casual meeting area.	Bolbrook Enterprise Centre, Avonmore Road, Tallaght, Dublin 24	GRANT PERMISSION	9/2/2021
SD22A/0058	The installation of a 1.62m high, 0.87 m wide, 0.5m deep above ground natural gas pressure reduction cabinet and an accompanying 3.25m vent stack with all ancillary services and associated site works.	Glenview Lawns, Tallaght, Dublin 24	PERMISSION APPLICATION SUBMITTED	
SD188/0002	Rapid Build Social Housing Development consisting of 16 housing units on undeveloped lands on site located on Old Knocklyon Road [Homeville end], and bounded by Firhouse Road, and the M50 motorway, (site opposite Homeville Court), at Firhouse, Dublin 16. In accordance with the requirements of the above, notice is hereby given that South Dublin County Council proposes: 2 no. 3 bedroom/5 person units - 2 storey; 5 no. 3 bedroom/5 person units - 2 storey; 9 no. 2 bedroom/3 person units - 3 storey Apartment Unit. The works include: New access off Old Knocklyon Road, landscaping works to boundaries and new park/play area, ancillary works to landscape housing areas, and all necessary associated ancillary works on the site and adjacent areas. All units to be minimum A2 BER rated. The housing provision includes two / three storey units grouped in terraces. Plans and particulars of the proposed scheme will be available for inspection or purchased at a fee not exceeding the reasonable cost of making a copy for a period of 6 weeks from Thursday 26th April 2018 during the public opening hours at the offices of South Dublin County Council, County Hall, Tallaght, Dublin 24 and South Dublin County Council, Civic Offices, Clondalkin, Dublin 22 (between the hours of 9:00am – 5:00pm Monday to Thursday and 9.00am - 4.30pm on Friday). Submissions: A submission or observation in relation to the proposed development, dealing with the proper planning and sustainable development of the area in which the development would be situated, may be made, in writing, to the Senior Executive Officer, Housing Department, South Dublin County Council, County Hall, Tallaght, Dublin 24, before 5:00pm Monday to Thursday and before 4:30pm on Friday, on Monday, 25th June 2018. Only submissions received by 5:00pm on Monday the 25th of June and addressed as set out above, will be considered.	Old Knocklyon Road, Firhouse, Dublin 16	UNREGISTERED APPLICATION	

	Submissions and observations can also be made online between the 26th April 2018 and 25th June 2018 (excluding Public Holidays) at https://consult.sdublincoco.ie up to 12.00 Midnight on the 25th June 2018. NOTE: Please make your submission by one medium only. Only submissions received by 25th June 2018 and addressed as set out above, will be considered. Submissions cannot be accepted in any other format or to any other postal address. Submissions and observations should state the name, address, and, where relevant, details of any organisation, community group or company etc. which you represent. Senior Executive Officer, Housing Department, South Dublin County Council, County Hall, Tallaght, Dublin 24. https://consult.sdublincoco.ie/en/consultation/proposed-rapid-build-social-housing-development-consisting-16-housing-units-site			

STATEMENT OF RESULTS FROM OTHER RELEVANT ASSESSMENTS

awnconsulting
A Trinity Consultants Company

The Tecpro Building,
Clonshaugh Business & Technology Park,
Dublin 17, Ireland.

T: + 353 1 847 4220
F: + 353 1 847 4257
E: info@awnconsulting.com
W: www.awnconsulting.com

Project	Proposed Large Scale Residential Development at the Former Firhouse Inn site, Firhouse Road, Firhouse, Dublin 24
Subject	Statement of Results from other Relevant Assessments
Author	David Doran
Date	25 January 2023
Ref.	DD/247501.0001TR01

1.0 INTRODUCTION

AWN Consulting have been appointed by Bluemont Developments (Firhouse) Limited ('the Applicant'), to prepare this Statement of Results from other Relevant Assessments. This document provides a statement indicating how the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive (Directive 2011/92/EU, as amended by 2014/52/EU) have been taken into account.

This statement is part of the information provided by the Applicant so that South Dublin County Council may complete an examination for the purposes of a screening determination. This statement will identify the relevant European Union legislation, and assessments of the effects on the environment carried out pursuant thereto, which have informed the proposed development. These relevant assessments will be identified as they relate to the proposed development, the results of those assessments will be outlined, and how those results have been taken into account in determining the significance of the proposed development on the environment will be identified.

The proposed development is a sub-threshold development. The application is not accompanied by an Environmental Impact Assessment Report. An EIA screening report has been prepared under separate cover.

The development will consist of the demolition of the existing single and two-storey buildings on the site (c. 1326 sq m), including the former 'The Firhouse Inn' public house and off-licence, barbers, betting office, cottage and other ancillary structures and construction of 2 no. blocks (Blocks 01 and 02) ranging in height from three to five storeys, comprising 100 no. residential over commercial ground floor uses (355 sq m), all over a basement level.

The proposed development comprises the demolition of all existing structures on site, including the 2-storey building formally used as public house ancillary off-licence & associated structures on the east of the site; a 2-storey building comprising an existing

barber shop and betting office to the west of the site; single-storey cottage building and associated structures in the centre of the site; and gated entrance from Mount Carmel Park.

The proposal includes the construction of 100 no. residential units within 2 no. blocks ranging in height from 3- 5-storeys (over lower ground floor and basement level) comprising; 96 no. apartments, (providing 3 no. studio units, 45 no. 1-bedroom units, 9 no. 2-bedroom (3-person) units, 36 no. 2-bedroom (4-person) units, and 3 no. 3-bedroom units); and 4 no. duplex units (providing 2 no. 1-bedroom units and 2 no. 2-bedroom (4-person) units). The apartment blocks will consist of the following:

- Block 01 – 5-storey apartment block (3-storeys rising to 5-storey over basement levels) comprising 48 no. apartment units as follows: 2 no. studio units, 22 no. 1-bedroom units, and 20 no. 2-bedroom apartments units, along with 4 no. duplex units comprising 2 no. 1-bedroom units and 2 no. 2-bedroom duplex units. Each unit will have its own private open space in the form of a private balcony or terraced area.
- Block 02 – 5-storey apartment block (over basement levels) comprising 52 no. apartment units as follows: 1 no. studio unit, 23 no. 1-bedroom units, and 25 no. 2-bedroom units, and 3 no. 3-bedroom units. Each unit will have its own private open space in the form of a private balcony or terraced area.

The development will also provide for 355 sq. m. of non-residential/commercial development as follows:

- 1 no. café and 1 no. office located at ground floor level of Block 01 fronting onto Firhouse Road;
- 1 no. creche and associated play area to the rear of Block 01;
- 1 no. barbershop at ground floor level located between Block 01 and Block 02 fronting Firhouse Road;
- 1 no. bookmaker and 1 no. medical consultancy at ground floor level of Block 02, fronting onto Firhouse Road.

The proposed development will provide for 80 no. car parking spaces including accessible parking and Electric Vehicle parking across basement and lower ground floor levels; set down area; 270 no. bicycle parking spaces; 8 no. motorbike parking spaces; landscaping, including communal open space and public open space and children's play spaces; SuDS measures; boundary treatment; public lighting; ESB substation; plant and waste storage areas; associated signage details; all associated site and infrastructure works necessary to facilitate the development, including the relocation of existing watermain and surface water sewer on the site; vehicular access to the development will be via the exiting access off the Firhouse Road, with 1 no. pedestrian and cyclist access from Firhouse Road and 1no. pedestrian and cyclist access from Mount Carmel Park.

2.0 HABITATS DIRECTIVE (DIRECTIVE 92/43/EEC) AND BIRDS DIRECTIVE (DIRECTIVE 2009/147//EC)

The main EU legislation for conserving biodiversity is the Directive 2009/147//EC of the European Parliament and of the Council of November 2009 on the conservation of

wild birds (Birds Directive); and the Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (Habitats Directive).

2.1 RELEVANT ASSESSMENTS

Appropriate Assessment (AA) Screening

An Appropriate Assessment (AA) Screening has been undertaken for the proposed development by Flynn Furney Environmental Consultants (2023). This takes into account the requirements of the objectives of the Habitats Directive and the Birds Directive. This is included with the planning documentation. The AA Screening concludes:

Ten (10 no.) designated sites - *Glensmole Valley SAC, the Wicklow Mountains SAC, the Wicklow Mountains SPA, the North Dublin Bay SAC, the South Dublin Bay SAC, the Knocksink Wood SAC, the Ballyman Glen SAC, the North Bull Island SPA, the South Dublin Bay and River Tolka Estuary SPA* and *Rye Water Valley/Carton SAC* - are located within a 15km radius of the Proposed Development. The AA Screening concludes:

> *In view of the best and objective scientific knowledge and in view of the conservation objectives of the European sites reviewed in the screening exercise, the proposed development as described here, individually/in combination with other plans and projects (either directly or indirectly) is not likely to have any significant effects on any of the European sites. Therefore, it is recommended to An Bord Pleanála that Appropriate Assessment is not required.*

The conclusions of the AA Screening have been adopted within the EIA Screening Report (Sections 3.4 and Section 5.3) when considering the ecological sensitivity of the site and determining the likelihood of significant effects on the environment arising from the proposed development with particular attention to potential impacts on European Sites.

Ecological Impact Assessment

An Ecological Impact Assessment (EclA) has been undertaken for the proposed development by Flynn Furney Environmental Consultants(2023) and is included with the planning documentation.

This report includes an assessment of potential impacts on biodiversity, including protected species or habitats, that are likely to arise from the residential development during either the construction or operational phases.

The Ecological Impact Assessment considers that:

> *An extensive desktop survey was carried out which used available data from suitable sources which included online databases (e.g. National Parks and Wildlife Service and National Biodiversity Data Centre) and previous surveys (e.g. for the Dodder Greenway).*
>
> *A very limited range habitats was recorded during survey. The site proposed for development contains only built habitat areas, a highly modified site. Surveys of the adjacent areas found No habitats listed on Annex I of the EU Habitats Directive were found within the survey area. No plants subject to*

the Flora Protection Order (2015) were found to occur within the area surveyed.

Four areas surveyed were described in the habitat survey as Environmentally Sensitive Areas (ESAs), being of greater sensitivity due to the habitats or species occurring here. These included the River Dodder and mixed broadleaved woodland within the river valley.

No protected mammal species were found to occur within the area proposed for development. It was noted that suitable habitat for some protected mammal species occurs within the ESAs as described above and that 5 no. protected mammal species have been recorded within 2km of the proposed development site. However, there is no suitable habitat for these species here.

A dedicated survey of at the existing buildings found no evidence of bat habitation. However, the same survey showed that there is suitable habitat here for bat roosts. Further preconstruction bat surveys are therefore recommended.

No bird species were recorded as nesting in the existing built habitat at the site. No negative impacts on bird species are therefore predicted. However, it is recommended that a further bird survey is carried out of the buildings prior to development as bird nesting may take place here in the interim period.

A targeted survey for invasive species was carried out. No invasive species of anything higher than medium impact were found at the site proposed for development. No significant effects are expected to arise from the presence of these.

An evaluation of habitats showed that the site proposed for development is of Low Local value. The significance of impacts here may be described as being of negligible significance. In terms of habitat evaluation, the Dodder Valley pNHA was the only site within the survey area being of national importance. No potential impacts to this designated site were predicted given the location and nature of works. Indeed no other significant effects are predicted for any other habitat type within the survey area.

It is recommended that the above mitigation measures are fully implemented in order to minimise any potential for ecological impacts.

The conclusions of the Ecological Impact Assessment have been adopted within the EIA Screening Report (Section 3.4 and 5.3) when considering the ecological sensitivity of the site and determining the likelihood of significant effects on the environment arising from the proposed development in respect of Biodiversity, with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive.

Bat Survey Report

All Irish bat species are protected under the Wildlife Act (1976) and Wildlife Amendment Acts (2000 and 2010).

A Bat survey report has been prepared for the proposed development, relating to the Firhouse Inn and adjacent buildings (both proposed to be demolished). As noted in the

survey, no bats or evidence of bats noted in the buildings during the survey; no bat droppings or staining around window sills and exposed features around windows and walls were found during the survey; and no bats were seen emerging from or re-entering the properties during the survey. A pre-works internal survey of both buildings is required immediately before any works involving demolition and renovation are carried out. (Flynn Furney, 2023).

The conclusions and mitigation measures set out in the Bat Survey Reports (Flynn Furney, 2023) have been adopted within the EIA Screening Report when determining the likelihood of significant effects on the environment, arising from the proposed development in respect of Biodiversity, with particular attention to species and habitats (with specific refence to bat) protected under the Habitats Directive and the Birds Directive.

3.0 WATER FRAMEWORK DIRECTIVE (DIRECTIVE 2000/60/EC)

The Water Framework Directive (WFD) (Directive 2000/60/EC) requires all Member States to protect and improve water quality in all waters.

The WFD requires 'Good Water Status' for all European waters to be achieved through a system of river basin management planning and extensive monitoring by 2015 or, at the least, by 2027. 'Good status' means both 'Good Ecological Status' and 'Good Chemical Status'.

The objectives of the WFD are (1) to prevent the deterioration of water bodies and to protect, enhance and restore them with the aim of achieving at least good status and (2) to achieve compliance with the requirements for designated protected areas.

3.1 RELEVANT ASSESSMENTS

The EIA Screening has been informed by the water quality status as defined by the monitoring program and assessment undertaken by the EPA pursuant to the obligations to the WFD. The results of the monitoring program and assessment undertaken by the EPA are summarised below:

> *The Dodder Sub catchment discharges into the Liffey Estuary Lower. The River Dodder (DODDER_040_) has a WFD status (2013-2018) of 'Poor; the Dublin Bay Coastal waterbody has a WFD status of 'Good'. The Liffey Estuary Lower waterbody has a WFD risk score of 'At risk of not achieving good status' while the Dublin Bay waterbody has a WFD risk score of 'Not at risk'. The surface water quality data for the Liffey Estuary and Dublin Bay (EPA, 2021) indicate that they are 'Unpolluted'. Under the 2015 'Trophic Status Assessment Scheme' classification of the EPA, 'Unpolluted' means there have been no breaches of the EPA's threshold values for nutrient enrichment, accelerated plant growth, or disturbance of the level of dissolved oxygen normally present.*
>
> *This 'Poor' WFD status for the River Dodder is related to its biological status (invertebrate); all chemical conditions have been assigned a value of "pass" or "high". The most recent quality data (1998) in the proximity of the site (c. 230 m) for the River Dodder (RS09D010420) indicated that the quality was 'Good' giving it a Q value of 4.*

The results of the monitoring program and assessment by the EPA have been used to determine the current water body status of the aquifer and receiving waters for any

discharge from the proposed development site. The current water body status has been considered within the EIA Screening (Section 4.2).

The current water body status has been considered in the examination of the likelihood of significant effects on water quality in the Dodder Sub Catchment and Dublin Bay having regard to potential direct and indirect impacts from surface water and foul water arising from the proposed development during the construction and operational phases.

4.0 THE FLOODS DIRECTIVE (DIRECTIVE 2007/60/EC)

The Floods Directive (Directive 2007/60/EC) establishes a framework for the assessment and management of flood risks, with the aim to reduce the adverse consequences on human health, the environment and material assets.

The Floods Directive must be implemented in tandem with the WFD. In Ireland, the OPW is the national authority assigned with the implementation of the Floods Directive, which was transposed into Irish law by the European Communities (Assessment and Management of Flood Risks) Regulations SI 122 of 2010.

4.1 RELEVANT ASSESSMENTS

A Site-Specific Flood Risk Assessment (FRA) and is included as Section 7 to the Water Services Report prepared by PHM Consulting (2021a). This Site-Specific FRA draws on, and is informed by studies undertaken by the OPW pursuant to the requirements of the Floods Directive, including:

- South Dublin Development Plan 2022-2028 (including Strategic Flood Risk Assessment)
- Greater Dublin regional Code of Practice for Works
- Office of Public Works Flood Maps
- Department of the Environment Flooding Guidelines
- Geological Survey of Ireland Maps
- Local Authority Drainage Records

The Site-Specific FRA considers that the proposed development is appropriate for the locations and therefore, further assessment and justification test is not required under The Planning System and Flood Risk Management Guidelines (OPW, 2009).

The results of the Site-Specific FRA have been considered with the EIA Screening Report in the examination of the likelihood of significant effects on the environment arising from the proposed development as a consequence of flooding, which has the potential to affect human health and material assets.

5.0 SEVESO DIRECTIVE 82/501/EEC, SEVESO-II DIRECTIVE 96/82/EC, SEVESO-III DIRECTIVE 2012/18/EU

The Seveso Directive (Directive 82/501/EEC, Directive 96/82/EC, Directive 2012/18/EU) was developed by the EU after a series of catastrophic accidents involving major industrial sites and dangerous substances. Such accidents can give rise to serious injury to people or serious damage to the environment, both on and off the site of the accident.

The Chemicals Act (Control of Major Accident Hazards involving Dangerous Substances) Regulations 2015 (S.I. No. 209 of 2015) (the "COMAH Regulations"), implements the latest Seveso III Directive (2012/18/EU).

5.1 RELEVANT ASSESSMENTS

The proposed development is of a type not especially vulnerable to risk of major accidents as there are no substances to be stored as part of the proposed development that would be controlled under Seveso Directive of COMAH Regulations, and the site is not located near any existing Seveso site.

The Irish Distillers Ltd site (Lower Tier Seveso site) at 7-9 Robinhood Road, Fox and Geese, Dublin 22 is the closest Seveso site to the proposed development site located 4km away. As the consultation distance from the site is 300m, this will not form a constraint on the proposed development. The B.O.C. Gases site (Upper Tier Seveso site) is located 4.2km from the proposed development site. This site has a consultation distance of 700m and therefore will also not form a constraint on the proposed development.

There are no specific assessments required by the Applicant under the Seveso Directive or COMAH Regulations.

6.0 CLEAN AIR FOR EUROPE (CAFE) DIRECTIVE (DIRECTIVE 2008/50/EC)

The Clean Air for Europe (CAFE) Directive 2008/50/EC is the prevailing legislation to improve the quality of air in Europe and limit exposure to air pollution. The CAFE Directive set rules including how to monitor, assess, and manage ambient air quality.

The CAFE Directive mandates the location and quantity of air monitoring stations that Environmental Protection Agency (EPA) should undertake ambient air monitoring. If there is an exceedance of the ambient limit value an Air Quality Action Plan must be developed by Local Authorities in conjunction with the EPA.

In Ireland there is only one monitoring site that has exceedance of the EU Air Quality limit value for nitrogen dioxide, this is located at St. John's Road West station Dublin. An annual average concentration of 43 $\mu g/m^3$ was measured in 2019. This is above the EU annual limit value for NO_2 of 40 $\mu g/m^3$. There have been no exceedances recorded at any monitoring stations subsequently during 2020 or 2021. This exceedance of an air pollution standard is as a result of the heavy traffic passing this monitoring station. In response to this the Dublin Region Air Quality Plan (2021) has been developed by the Dublin Local Authorities in conjunction with the EPA.

6.1 RELEVANT ASSESSMENTS

The Dublin Region Air Quality Plan (2021) this set out 14 measures and actions to be established by Dublin Authorities and the Minister for Environment. The proposed development is not located within an area which has an identified exceedance in the EU air quality limits;, there are no specific assessments under the CAFE Directive relevant to the proposed development at this location.

7.0 THE WASTE FRAMEWORK DIRECTIVE (DIRECTIVE 2008/98/EC)

Directive 2008/98/EC has applied since December 2010 and Amending Directive (2018/851/EU) was adopted on 30 May 2018 (together, the "Waste Framework Directive"). The Waste Framework Directive was transposed into national legislation by the European Union (Waste Directive) Regulations 2011-2020, which includes amendments to the Environmental Protection Agency Act 1992 (as amended) and the Waste Management Act 1996 (as amended).

The Waste Framework Directive includes requirements for member states to carry out certain monitoring and assessment, including in relation to the implementation of the waste prevention measures, implementation of measures on re-use and food waste prevention measures, need for waste installation infrastructure, waste collection schemes, rates of recycling and landfill and the implementation of waste management plans and waste prevention programmes.

One of the major relevant aspects of the Waste Directive in relation to construction sites is Article 5 that is transposed into Irish legislation by Article 27 of the Waste Directive Regulations. The Waste Directive provides a formal mechanism by which a substance or object, which is production residue, could be determined not be a waste but instead a by-product.

7.1 RELEVANT ASSESSMENTS

The Eastern-Midlands Region Waste Management Plan 2015-2021 published by the Dublin City Council on behalf of the Eastern-Midland Waste Region is the overarching policy document set out how the requirements of the Waste Framework Directive are met.

There are no specific assessments required by the applicant pursuant to the Waste Framework Directive. Irrespective of this, a Construction Waste Management Plan prepared by PHM Consulting is included with the planning documentation. The principles set out in the Waste Framework Directive have been taken into account thorough the design of the proposed development and the mitigation measures set out in these reports.

The Construction Waste Management Plan (PHM Consulting, 2023) has been prepared to demonstrate how it is proposed during the Construction Phase to comply with the following relevant legislation and guidelines including:

- Waste Management Act 1996 (as amended)
- Waste Management (Collection Permit) Regulations 2007 (SI No. 820 of 2007)
- Waste Management (Collection Permit) Amendment Regulations 2008 (SI No. 87 of 2008)
- Environmental Protection Agency (EPA) 'Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for Construction & Demolition Projects' 2021
- EPA "Guidance on Soil and Stone By-Products in the context of Article 27 of the European Communities (Waste Directive) Regulations – Version 3 June 2019

The management practices set out in Section 4 of Construction Waste Management Plan have been adopted within the EIA Screening Report (Section 5.9) in the examination of the likelihood of significant effects on the environment arising from the proposed development in respect of material assets and waste.

8.0 STRATEGIC ENVIRONMENTAL ASSESSMENT (DIRECTIVE 2001/42/EC)

Directive 2001/42/EC, the SEA Directive, on the assessment of the effects of certain plans and programmes on the environment requires that an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment. Public plans and programmes that are likely to have significant effects on the environment must have a Strategic Environmental Assessment (SEA).

The SEA Directive (2001/42/EC) is implemented in Ireland by the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (SI 435/2004) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI 436/ 2004), as amended.

8.1 RELEVANT ASSESSMENTS

South Dublin County Council as part of the South Dublin County Council Development Plan (2022-2028) undertook a Strategic Environmental Assessment (SEA) to provide a clear understanding of the likely environmental consequences of decisions regarding the adoption and implementation of the development plan.

The SEA for the South Dublin County Council Development Plan 2022 - 2028 sets out the requirements for monitoring of the plan for the identification of unforeseen adverse effects and the undertaking of appropriate remedial action at an early stage. The SEA for the development plan also states that additional detailed mitigation measures to those listed within the SEA and those integrated into the development plan would be likely to be required by the development management and EIA processes of individual projects.

With particular reference to the monitoring and mitigation issues raised in the development plan the potential for effects in respect of Water Quality, Biodiversity (Natura 2000 sites), and Flooding and the need for the need for mitigation measures for the proposed development have been considered within the application documentation. Specifically, within the Appropriate Assessment (AA) Screening Report (Altemar, 2023) and the site-specific Flood Risk Assessment (PHM Consulting 2023).

The results of these assessments have been considered within the EIA Screening Report in the examination of the likelihood of significant effects on the environment arising from the proposed development on the existing water regime and have informed in particular the assessment of potential impacts on the water quality and European Sites.

9.0 DIRECTIVE 2008/56/EC; MARINE STRATEGY DIRECTIVE

The Marine Strategy Directive (2008/56/EC) was adopted on 17 June 2008 and establishes a framework for community action in the field of marine environmental policy. This has been subsequently amended by Directive (2017/845/EC) as regards the indicative lists of elements to be taken into account for the preparation of marine strategies. The Marine Strategy Directive (2008/56/EC) was transposed into national legislation by the European Communities (Marine Strategy Framework) Regulations 2011 (S.I. 249 2011).

As a residential and commercial development set well back from any coastal area, the Marine Strategy Directive is not directly relevant to the proposed Project. Any impact

to nearby water bodies has been assessed as part of the EIA Screening Report and factored into project design.

The EIA Screening Report notes that the *'proposed development due to its size and location will not have any effect on wetlands, riparian areas, river mouths, coastal zones and the marine environment, mountain and forest areas, and nature reserves'*.

10.0 DIRECTIVE 2010/75/EU; INDUSTRIAL EMISSIONS DIRECTIVE

The Industrial Emissions Directive (2010/75/EU) on industrial emissions (integrated pollution, prevention and control) was adopted on 24 November 2010. The Directive was transposed into national legislation by the Environmental Protection Agency (Industrial Emissions) (Licensing) Regulations 2013 (S.I. 137 2013).

The Directive is not directly relevant to the proposed project, and the proposed development will not directly involve industrial activities under the Directive.

11.0 REGULATION (EU) 1315/2013; TRANS-EUROPEAN NETWORKS IN TRANSPORT, ENERGY AND TELECOMMUNICATION REGULATION

Regulation (EU) 1315/2013 on Union guidelines for the development of the trans-European network and repealing Decision 661/2010/EU was adopted on 11 December 2013.

Regulation 1315/2013 is not directly relevant to the proposed Project.

12.0 CONCLUSION

This statement indicates how the available results of relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive have been taken into account in this proposed Project.

This statement identifies the relevant Directives which have informed the proposed project. The relevant assessments has been identified as they relate to the proposed development, the results of those assessments, and how those results have been taken into account in determining the significance of the proposed development on the environment.

This statement should be read in conjunction with the Environmental Impact Assessment Screening document prepared by AWN Consulting and enclosed with the application.

ABP may complete an examination for the purposes of a screening determination in accordance with Article 299B of the Planning Regulations and, in particular, may have regard to all of the matters prescribed at Article 299B(1)(b) of the Planning Regulations.

This statement, in particular, is provided so that ABP may have regard to "*the available results of other **relevant assessments** of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive have been taken into account"* in accordance with Article 299B (1)(b)(ii)(II)(C) of the Planning Regulations.

This statement supports the conclusion in the EIA Screening document prepared by AWN Consulting that the proposed development is not likely to have any significant impacts on the environment and, therefore, that no EIA is required in respect of the proposed development.

13.0 REFERENCES

Water Services Report for Firhouse Inn Strategic Housing Development Firhouse Road, Dublin 24. PHM Consulting. 2023.

Construction Environmental Management Plan - Firhouse Inn Strategic Housing Development Firhouse Road, Dublin 24. PHM Consulting. 2023.

Construction Waste Management Plan - Firhouse Inn Strategic Housing Development Firhouse Road, Dublin 24. PHM Consulting. 2023.

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Archaeological Impact assessment and method statement for a proposed SHD development at The Firhouse Inn, Firhouse Road Dublin 24. Archaeology and Heritage Consultancy Ltd. 2021.

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FLYNN FURNEY
ENVIRONMENTAL CONSULTANTS

Bat survey of Firhouse Inn and adjacent buildings, Dublin 24

June 2023

Contents

1. Introduction

Ecologist Aidan Murphy M.Sc. QCIEEM carried out bat surveys of the Firhouse Inn and adjacent buildings on behalf of Flynn Furney Environmental Consultants on the 4th, 10th, 13th & 15th May 2022 and 26th June 2023. The surveys involved an internal search of the buildings to determine if bats are or were present. The properties are comprised of the Firhouse Inn, an adjacent cottage and a modern two storey building, currently used by Boyle Sports betting office. The properties are located in Tymon South, Firhouse, beside the junction of the Ballycullen Road and the Firhouse Road, site centre ITM: 71121 8727572. The M50 motorway passes approximately 150 metres to the east. A car park is located to the north (rear) of the buildings and a treeline of mature sycamore run along, outside the car park boundary. To the north of this treeline, there are fields with mature hedgerow and treeline boundaries, leading to the Dodder River. This section of the River Dodder is designated as an NHA (NPWS site code 000991).

2. Legislation and bats

All bat species are protected by law in Ireland at a national and European level. Nationally, the Wildlife Act 1976 (amended 2000) makes it an offence to wilfully interfere with, or destroy, the resting or breeding place for bats. All species of Irish bats are listed under Schedule 5 of the Wildlife Act (1976) making it an offence to:

- Intentionally kill, injure, or take a bat
- Possess or control any live or dead specimen or anything derived from a bat
- Wilfully interfere with any structure or place used for breeding or resting by a bat
- Wilfully interfere with a bat while it is occupying a structure or place which it uses for that purpose

The EU 'Habitats' Directive (92/43/EC; transposed into Irish law by S.I. No. 94 of 1997) provides legal protection for bats and their roosts at a European Union level. In addition, the Irish government are signatories of the 1979 Bonn 'Convention on the Conservation of Migratory Species of Wild Animals' and the 1982 Convention on the 'Conservation of European Wildlife and Natural Habitats'. Ireland must also fulfil commitments under the 1991 'Eurobats Agreement' for the conservation of bats in Europe. Under the EU Habitats Directive, lesser horseshoe bats are listed as an Annex II species (afforded special protection). All other Irish bat species are listed in Annex IV (general protection) of this directive.

Under existing legislation, the destruction, alteration or evacuation of a known bat roost must be notified to National Parks and Wildlife Service (NPWS) before works can commence on or adjacent to a known bat roost.

3. Methodology

3.1 Desk study

A search of bat records held on the National Biodiversity Datacentre's online portal[1] for the 2km area (tetrad O12D) in which the site is located, was requested. Such information can identify bat species which may occur within a proposed development site or in the surrounding areas. It should

[1] https://maps.biodiversityireland.ie/Map/Terrestrial/Dataset/128 Accessed May 1st, 2022

be noted that an absence of records is likely to reflect an absence of survey data and cannot be taken as confirmation that a particular species is not present in the site or surrounding area.

3.2 Field study – bat surveys

3.2.1 Internal/ external Inspections

An internal inspection of the Firhouse Inn and two adjacent building was carried out on the 6/5/2022. These inspections focused on the attic spaces in the three buildings. High-powered wide beam and narrow beam hand torches were used. Evidence for bats sought are dead and live animals, droppings, discarded insect remains, urine stains and greasy marks at entrances to structural crevices and gaps where bats may possibly roost.
An external search around the perimeter of the buildings was conducted and any possible access points i.e. gaps and crevices were noted and surveyed with the high powered torch and ladder as required. Walls, windowsills, exposed features around the windows and walls were inspected for any evidence of bat droppings or staining.

Ecologist Seán Meehan MSc. carried out bat surveys of the Firhouse Inn and adjoining cottage on behalf of Flynn Furney Environmental Consultants on the 2nd and 16th October 2020. The surveys involved an internal search of the buildings to determine if bats are or were present. No evidence of bat presence was noted in any of the buildings surveyed. Bat emergence/activity surveys were not undertaken as the time of survey was outside the optimal bat survey period.

3.2.2 Dusk/ dawn & activity surveys 2022 and 2023

Dusk/ dawn & activity surveys 2022: Four bat activity surveys (three dusk emergence and one dawn re-entry) were conducted on the 6th, 10th, 13th and 15th May, 2022 using a Batbox Duet bat detector and Echo Meter Touch 2 Pro bat detector. Conditions were good for all bat surveys with warm, dry weather and little or no breeze.
The three emergence surveys began 30 minutes before sunset and finished one and a half hours after sunset on each survey. The single dawn re-entry survey began one and a half hours before sunrise and finished 30 minutes after sunrise.

Dusk activity survey 2023: A bat dusk emergence survey was conducted on the 26th June 2023 using a Batbox Duet bat detector and Echo Meter Touch 2 Pro bat detector. The emergence survey began 30 minutes before sunset and finished one and a half hours after sunset.
Automated passive recordings of acoustic bat activity were carried out in conjunction with the emergence survey from half an hour before sunset to half an hour after sunset. Passive monitoring involves leaving a suitable automated bat detector in position with no observer present, and bats which pass sufficiently close to the detector microphone are recorded and their calls are stored for later analysis. Bat activity was recorded using Wildllife Acoustics Song Meter Mini Bat detectors. Bat recordings (sonograms) were manually analysed and identified to species level using specialist software, Wildlife Acoustics Kaleidoscope.
Song Meter A was located along the front, roadside elevations of the Firhouse Inn and adjacent buildings. Song Meter B was located along the east and rear elevations of the modern two storey building.

4. Results

4.1 Desk study results

The NBDC database search returned the following bat records for tetrad O12D, Table 1.

Table 1. Bat records for tetrad O12D

Grid Reference	Survey dataset	Species	Most recent date
O114277	All Ireland Daubenton's Bat Waterway survey	24 records from this location: Soprano pipistrelle (2) Daubenton's bat (22)	 18/08/2007 27/08/2014
O113277	All Ireland Daubenton's Bat Waterway survey	3 records from this location: Soprano pipistrelle (2) Daubenton's bat (1)	 18/08/2006 09/08/2008
O112277	All Ireland Daubenton's Bat Waterway Survey	5 records from this location: Soprano pipistrelle (2) Leisler's bat (1) Pipistrellus sensu lato (1) Daubenton's bat)1)	 18/08/2006 26/07/2007 18/08/2006 09/08/2008
O111277	All Ireland Daubenton's Bat Waterway survey	2 records from this location: Soprano pipistrelle (1) Daubenton's bat (1)	 26/07/2007 09/08/2009
O108274	All Ireland Daubenton's Bat Waterway survey	3 records from this location Daubenton's bat (1) Soprano pipistrelle (2)	 26/07/2007 18/08/2007
O106272	All Ireland Daubenton's Bat Waterway Survey	Daubenton's bat (1)	18/08/2007
O108276	All Ireland Daubenton's Bat Waterway Survey	Soprano pipistrelle (1)	18/08/2007
O105271	All Ireland Daubenton's Bat Waterway Survey	Daubenton's bat (1)	26/08/2009
O105269	EIA Survey – Scott Cawley	5 records from this location: Pipistrellus sensu lato (1) Soprano pipistrelle (1) Daubenton's bat (1) Leisler's bat (1)	 25/08/2012 24/08/2012 24/08/2012 24/08/2012
O110270	EIS and Road Survey – C. Kelleher	Soprano pipistrelle (1) Daubenton's bat (1)	22/06/2005 22/06/2005
O110270	EIS and Road Survey – C. Kelleher	Soprano pipistrelle (1) Daubenton's bat (1)	22/06/2005 22/06/2005

In addition, Bat Conservation Ireland's habitat suitability index[2], available to view on the NBDC online mapping portal, classifies tetrad O12D, within which the site is located, as having a moderate habitat suitability for bats, with a score of 24.67. Most of the bat records as per Table 1 are from the River Dodder corridor where suitable habitat for bats occurs.

4.2 Building surveys

4.2.1 Internal inspection

No evidence of bat presence was noted in any of the three buildings surveyed. The roof spaces are extensive in area and have sufficient height to be used by bats

The Firhouse Inn attic has an approximate ridge height of 2 m high and water ingress through the slate roof is evident with frequent water staining on the rafters. One hole in the slates near the ridge could potentially enable bats to access, however, heavy cover of cobwebs rules out bats using it as an entry point. An extension was added to the original building and the attic is extended to run continuously from east to west with returns facing north at both ends. The older attic space, to the east, has a moderate level of cobwebbing throughout the roof space suggesting bats had not been flying around recently and no staining visible on the timbers other than water staining from rainwater ingress. A single moth wing was noted indicating brown long-eared bat feeding, but no other sign of insects was observed. The newer attic space to the west was extensively used as file storage by the previous occupants and cobwebbing is not a feature. The water storage tank is uncovered but contains no bat corpses. The attic floor is covered in mouse droppings but no bat droppings were observed.

The cottage has two attics with a valley between the two roof spaces. Only one attic is accessible which is to the rear of the cottage. It has an approximate ridge height of 1.7 m high. The attic tank is covered and no holes were apparent in the tiled roof. It is moderately cobwebbed and there are no signs of bats.

The two story building to the west of the site has two separate attics; a large L-shaped attic to the front and a smaller attic to the rear on the east side. Neither attic showed any sign of bats.

4.2.2 External inspection

The external features of all buildings were also examined for signs of bat droppings or staining around windowsills and exposed features around windows and walls. None were found.

The soffits and fascias on the north facing gable ends of the Firhouse Inn are in poor condition with numerous holes suitable for entry by bats. The front attic of the cottage has two missing slates and mortar on the ridge tiles missing, allowing potential roost entry points for bats. The two story building is relatively modern and well maintained and offers no discernible roost features.

4.2.3 Dusk/ dawn surveys 2022

Over the course of the four activity surveys, no bats were seen emerging from or re-entering the properties; consequently, no bats were recorded as using the properties for roosting.

The full results of the dusk/dawn surveys are detailed in Table 2. Below are the

[2] Lundy, M.G., Aughney, T., Montgomery, W.I., & Roche, N. (2011) *Landscape conservation for Irish bats and specific roosting characteristics*. Bat Conservation Ireland. Accessed May 1st, 2022.

date, time, and weather details for all three of the activity surveys conducted.

- 4th May (Sunset 21:00) - Weather conditions were good for the survey (dry, 12^{o}C, no breeze, ca. 50% cloud cover at 21:00). Any bats present are likely to be active.

- 10th May (Sunset 21:11) - Weather conditions were good for the survey (dry, 13^{o}C with a light breeze and ca. 60% cloud cover at 21:11). Any bats present are likely to be active.

- 13th May (Sunset 21:16) - Weather conditions were good for the survey (dry, 20^{o}C with no breeze and ca. 40% cloud cover at 21.16). Any bats present are likely to be active.

- 15th May (Sunrise 05:26) - Weather conditions were good for the survey (dry, 11^{o}C with no breeze and ca. 60% cloud cover at 21:11). Any bats present are likely to be active.

The majority of bats recorded during the surveys were detected from the field and sycamores at the northern boundary of the carpark. The field and its mature hedgerows offer excellent habitat for bats and benefit from no light pollution. Bat sightings from within the area of the Firhouse Inn carpark were restricted to two soprano bats commuting through the site on the first dusk survey and one to two common pipistrelles intermittently foraging along the line of sycamore trees on all dusk surveys.

Table 2. Bat activity detected during the dusk and dawn surveys

Time	**Location**	**Species**	**Comments**
Dusk survey 04/05/2022			
21:33	Rear of Firhouse Inn	Leisler's bat	Detected - not seen
21:38	Rear of Firhouse Inn	Leisler's bat	Detected - not seen
21:40	Rear of Firhouse Inn	Soprano pipistrelle	Commuting south to north through site
21:49	Rear of Firhouse Inn	*Myotis* sp.	One pass detected. Faint detection
21:54	Rear of Firhouse Inn	Soprano pipistrelle	Flying along sycamores. Feeding
21:59	Rear of Firhouse Inn	Leisler's bat	Detected - not seen
Dusk survey 10/05/2022			
21:25	Modern two story	Soprano pipistrelle	Detected - not seen
21:26	Modern two story	Soprano pipistrelle	Distant call detected
21:26	Modern two story	*Myotis* sp.	Detected - not seen
21:32	Modern two story	Common pipistrelle	Flying along sycamores. Feeding
21:33	Modern two story	Common pipistrelle	Flying along sycamores. Feeding
21.53	Modern two story	Common pipistrelle	Flying along sycamores. Feeding
22.12	Modern two story	Common pipistrelle	Flying along sycamores. Feeding
Dusk survey 13/05/2022			
21:22	Front of Inn & cottage	Leisler's bat	Detected - not seen
21:25	Front of Inn & cottage	Leisler's bat	Detected - not seen
21:34	Front of Inn & cottage	*Myotis* sp.	Distant call detected

21:38	Front of Inn & cottage	Soprano pipistrelle	Distant call detected
21:47	Front of Inn & cottage	Soprano pipistrelle	Detected - not seen
21:53	Front of Inn & cottage	Leisler's bat	Detected - not seen
22:59	Front of Inn & cottage	Leisler's bat	Detected - not seen
22.04	Front of Inn & cottage	*Myotis* sp.	Distant call detected
22.07	Front of Inn & cottage	Soprano pipistrelle	Distant call detected
22.17	Front of Inn & cottage	Soprano pipistrelle	Distant call detected
Dawn survey 15/05/2022			
04:11	Rear of Firhouse Inn	Soprano pipistrelle	Detected - not seen
04:23	Rear of Firhouse Inn	*Myotis* sp.	Detected - not seen
04:31	Rear of Firhouse Inn	Leisler's bat	Detected - not seen
04:51	Rear of Firhouse Inn	Common pipistrelle	Detected - not seen
04:55	Rear of Firhouse Inn	Soprano pipistrelle	Detected - not seen
05:00	Rear of Firhouse Inn	Leisler's bat	Detected - not seen
05:47	Rear of Firhouse Inn	Leisler's bat	Detected - not seen
05:54	Rear of Firhouse Inn	Leisler's bat	Detected - not seen

4.2.4 Dusk survey 2023

Over the course of the activity survey, no bats were seen emerging from or re-entering the properties; consequently, no bats were recorded as using the properties for roosting. Common pipistrelles and soprano pipistrelles were detected and observed feeding in the carpark adjacent to the treeline to the north of the site. Bat activity was considered low.
The full results of the dusk/ passive detector surveys are detailed in Table 3. Passive detector A located at the front elevation of the Firhouse Inn, where light pollution is significant, recorded no bat registrations. Passive detector B located at the east and front of the modern two storey building recorded two feint registrations for Leisler's bats but did not record the pipistrelle bats observed and recorded foraging in the carpark. It is likely the foraging bats avoided the light pollution from this building. Below are the date, time, and weather details for the activity survey conducted.

26th June (Sunset 21:57) - Weather conditions were good for the survey (dry, 15^{o}C, no breeze, ca. 90% cloud cover at 22:00). Any bats present are likely to be active.

Table 3. Dusk emergence/ passive detector surveys

Time	**Location**	**Species**	**Comments**
Dusk survey 26/06/2023			
22:27-22:32	Rear of Inn	Leisler's bat	Feint detection - not seen. 5 passes.
22:47-22:51	Rear of Inn	Common pipistrelle	Feeding in carpark. 5 passes
22:52	Rear of Inn	Soprano pipistrelle	Feeding in carpark. 1 pass
22:55	Rear of Inn	Common pipistrelle	Detected - not seen. 2 passes
Passive detector A. 26/06/2023			
N/A	Front of Inn	None	No bat registrations recorded
Passive detector B. 26/06/2023			
22:42	West end of site	Leisler's bat	Detected - not seen
22:57	West end of site	Leisler's bat	Detected - not seen

5. Mitigation measures

Wildlife surveys, including those for bats, are a 'snapshot' in time and the absence of a species, or evidence of their presence, does not preclude their presence at a later date. The Firhouse building has a number of annexes and extensions, offering potential roost locations for bats. The cottage offers roost potential but it is more limited. The modern two storey building is considered to have negligible roost potential as the building is well maintained and well-sealed.

Prior to works commencing, emergence (dusk) and re-entry (dawn) watches should be undertaken to ensure no bats are present. These should be carried out during the appropriate season, May to September. If bats are not confirmed exiting or entering the buildings, a further internal survey is required before demolition works involving roofs can commence, under the supervision of an ecologist. During the period October to April inclusive, a pre-works internal survey is required, and demolition works involving the roofs supervised by an ecologist.
If bats are confirmed, works cannot proceed until an NPWS derogation licence is obtained.

It is recommended that an ecologist has input into the external lighting plan for the future development to ensure the correct positioning and models of lighting columns are installed and the habitats around the development are not impacted by light overspill.

6. Conclusion

No bats or evidence of bat presence was noted in the Firhouse Inn building and the two adjacent buildings. However, considering the large roof space areas of the three buildings and the extensions to the main Inn building, the presence of bats cannot be completely ruled out. A pre-works internal survey of the three buildings is required immediately before any works involving demolition and renovation are carried out. Such works, particularly those involving roofs, should be done so under the supervision of an ecologist with a bat handling licence.

7 References

Collins, J. (ed.) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). The Bat Conservation Trust, London.

Kelleher, C. & Marnell, F. (2006) Bat Mitigation Guidelines for Ireland. Irish Wildlife Manuals, No. 25. National Parks and Wildlife Service, Department of Environment, Heritage and Local Government, Dublin, Ireland

Lundy, M.G., Aughney, T., Montgomery, W.I., & Roche, N. (2011) *Landscape conservation for Irish bats and specific roosting characteristics*. Bat Conservation Ireland. Accessed May 1st, 2022.

NRA (2006a) Best practice guidelines for the conservation of bats in the planning of national road schemes. National Roads Authority, Dublin, Ireland.Proposed Cahermurphy Two Wind Farm

NRA (2006b) Guidelines for the treatment of bats during the construction of national road schemes. National Roads Authority, Dublin, Ireland

8. Plates

Plate 1. Front of cottage and Firhouse Inn. View to east.

Plate 2. Rear of Firhouse Inn. View to south

Plate 3. Rear of Firhouse Inn and cottage. View to east.

Plate 4 . Firhouse Inn attic showing return at western end

Plate 5. Firhouse Inn attic showing middle attic

Plate 6 . Firhouse Inn attic, showing return at eastern end

Plate 7. Cottage showing roof with valley between two attic spaces. Rear attic (right) is tiled. Front attic (left) is inaccessible and has several slates dislodged allowing possible entry of bats

Plate 8. Interior attic of cottage (rear attic)

Plate 9. Exterior wall and windowsills were examined for bat droppings.

Plate 10. Front of two story modern building adjacent to and west of Firhouse Inn. View to east

Plate 11. Front attic of two story modern building.

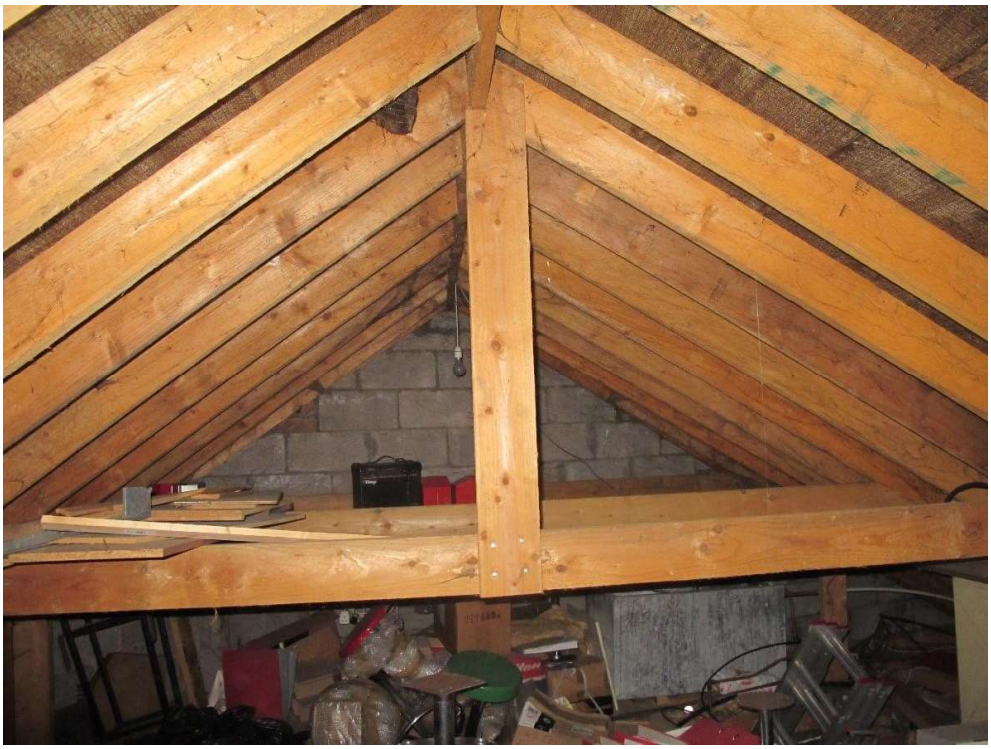


Plate 12. Rear attic of two story modern building.

No. 2 Firhouse Road and the former 'Morton's The Firhouse Inn', Firhouse Road, Dublin 24: Bird Survey Report

FLYNN FURNEY
ENVIRONMENTAL CONSULTANTS

For: Bluemont Developments (Firhouse) Limited
Date: 9 May 2022

Table of Contents

1. INTRODUCTION

This brief report outlines the findings of a survey for breeding birds carried out at the site of the former Firhouse Inn and No2 Firhouse Rd., Firhouse, Dublin by Flynn Furney Environmental Consultants on behalf of Bluemont Developments (Firhouse) Limited. The purpose of this survey was to ascertain whether any native or other breeding birds are utilising the buildings at this site. A survey of the birds utilising the trees adjacent the site was also carried out. All Irish birds are afforded some level of protection under law. This includes their refugia and nesting places.

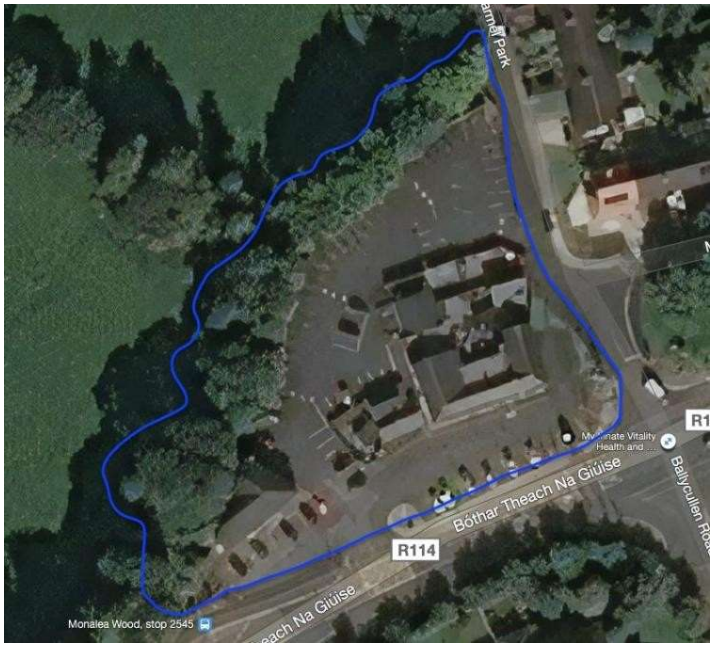


Fig. 1 Area under survey at former Firhouse Inn site.

2. METHODOLOGY

The buildings at the former Firhouse Inn and No 2 Firhouse Road were observed for c. 3 hours between 7am and 10am on April 27th 2022. This was carried out by an experienced and qualified Ecologist. Any signs of bird nesting activity or other bird activity were recorded. The Ecologist paid particular attention to areas where bird access or egress might be allowed. For example, cavities, roof spaces missing tiles or ill-fitting doors.

3. RESULTS

No birds were observed entering or exiting any of the buildings at the former Firhouse Inn and the adjacent buildings. No nesting activity was observed in any of the areas within the grounds of these premises. A number of bird species were seen and heard overflying the site and alighting in the mature trees adjoining the site. These included Wood Pigeon (*Columba paulumbus*), Starling (*Sturnus vulgaris*), Rook (*Corvus frugilegus*), Chaffinch (*Fringilla coelebs*), House Sparrow (*Passer domesticus*), Blue Tit (*Cyanistes caerulus*), Great Tit (*Parus major*) and Magpie (*Pica pica*). Birds overflying the site included Herring Gull (*Larus argentatus*), Lesser Black-backed Gull (*Larus fuscus*) and Jackdaw (*Corvus monedula*).

4. DISCUSSON

No birds were recorded entering or exiting the building during the survey period. The survey was carried out within peak nesting season for breeding birds. Therefore, some bird nesting activity would have been observed were any nests present within the site.

A number of bird species were observed or heard either within the mature trees adjacent the site and the adjoining site or overflying the site. Nesting behaviour of Wood Pigeon was recorded within at least one of the mature Sycamore trees adjoining the site. Nesting behaviour of other species was not recorded.

Fig. 2. Mature Sycamore Trees directly adjacent the buildings

It should be noted that this survey is a record of bird nesting activity on the day of survey. It must be allowed that bird nesting activity may commence within the site following the date of this survey. Therefore, the building must be surveyed for the presence of any nesting bird species prior to commencement of any site clearance, demolition or construction activity on this site. No vegetation should be cleared within the site during the bird nesting season (March-August inclusive) in order to protect nesting birds. Any pruning of the mature trees should be carried out outside the above period.

Appendix A. Some Photographs of Site

Fig. 1 A section of the curtilage of the former Firhouse Inn.

Fig. 2 Mature Trees adjoining the site.

Fig. 3 Mature Sycamore trees that are likely important for some breeding species.

FLYNN FURNEY
ENVIRONMENTAL CONSULTANTS

Screening for Appropriate Assessment

No. 2 Firhouse Road and the former 'Morton's The Firhouse Inn', Firhouse Road, Dublin 24 – Large-Scale Residential Development

Date: December 2023

For: Bluemont Developments (Firhouse) Limited

Note

Works, plans, methodologies, materials, and infrastructural requirements are based on the client's brief, draft plans, and drawings provided to Flynn Furney Environmental Consultants of December 2023.

Statement of Authority

This Appropriate Assessment Screening has been carried out by suitably qualified and experienced professionals of Flynn Furney Environmental Consultants. These were Ian Douglas BSc, MSc and Billy Flynn BSc, MSc, MCIEEM, CEnv.

Contents

1 INTRODUCTION

Bluemont Developments (Firhouse) Limited., intend to apply for permission for a Large-Scale Residential Development (LRD) at No. 2 Firhouse Road and the former Morton's The Firhouse Inn, Firhouse Road, Dublin 24. The site is also bound by Mount Carmel Park to the east.

The proposed development seeks to provide for the demolition of all existing structures on site, including the 2-storey building formally used as public house ancillary off-licence & associated structures on the east of the site; a 2-storey building comprising an existing barber shop and betting office to the west of the site; single-storey cottage building and associated structures in the centre of the site; and gated entrance from Mount Carmel Park.

This screening exercise aims to determine whether the proposed construction and operation of the residential development may have the potential to impact the conservation objectives and overall integrity of any Natura 2000 sites significantly or indeterminately. This assessment is based upon desk research and fieldwork carried out by suitably qualified ecologists.

Designated sites within 15km of the proposed development as well as other relevant sites have been reviewed for potential impacts or pathways for impacts. This is followed by an ecological assessment of the project area, including possible impacts on designated sites. Section 5 of the report comprises the AA Screening that focuses on any potential impacts on Natura 2000 sites and their conservation objectives.

This report has been completed to provide the information necessary to allow the competent authority to conduct an Article 6[3] Appropriate Assessment (AA) Screening of the proposed development. The legislation and methodology for which is detailed in the following sections below.

1.1 Relevant Legislation and Overall Screening Methodology

The methodology for this screening statement is set out in a document prepared for the Environment DG of the European Commission entitled 'Assessment of plans and projects significantly affecting Natura2000 sites: Methodological guidance on the provisions of Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC' (European Commission, 2019, amended 2021). This report and contributory fieldwork were

carried out by guidelines given by the Department of Environment, Heritage and Local Government (2009, amended February 2010). This report has been prepared with regard to the following guidance documents on Appropriate Assessment, where relevant:

- Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (Department of Environment, Heritage and Local Government, 2010 revision);
- Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPWS 1/10 & PSSP 2/10;
- Assessment of Plans and Projects Significantly Affecting Natura 2000 sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission Environment Directorate-General, 2001 and updates April 2015 and September 2021). The guidance within this document provides a non-mandatory methodology for carrying out assessments required under Article 6(3) and (4) of the Habitats Directive;
- Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC (EC Environment Directorate-General, 2018); and
- Communication from the Commission on the precautionary principle. European Commission (2000). · OPR (2021) Appropriate Assessment Screening for Development Management. Practice Note PN01. Office of the Planning Regulator. March 2021.

The process is given in Articles 6(3) and 6(4) of the Habitats Directive and is commonly referred to as 'Appropriate Assessments' (which refers to Stage 2 in the sequence under the Habitats Directive Article 6 assessment). Article 6 of the Habitats Directive sets out provisions that govern the conservation and management of Natura 2000 sites. Article 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans and projects likely to affect Natura 2000 sites (Annex 1.1). Article 6(3) establishes the requirement for Appropriate Assessment:

"Any plan or project not directly connected with or necessary to the management of the (Natura2000) site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subjected to appropriate assessment of its implications for the site in view of the site's conservation objectives. In light of the conclusions of the assessment of the implication for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."

Article 6(4) of the same directive states:

"If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of the Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted. Where the site concerned hosts a priority natural habitat type and/or a priority species the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest."

It is the responsibility of the proponent of the plan or project to provide the relevant information (ecological surveys, research, analysis etc.) for submission to the 'competent national authority'. Having satisfied itself that the information is complete and objective, the competent authority will use this information to screen the project, i.e. to determine if an AA is required and to carry out the AA, if one is deemed necessary. The competent authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned.

The appropriate assessment process has four stages. Each stage determines whether a further stage in the process is required. If, for example, the conclusions at the end of Stage One are that there will be no significant impacts on the Natura 2000 site, there is no requirement to proceed further. The four stages are:

1. Screening to determine if an appropriate assessment is required
2. Appropriate assessment
3. Consideration of alternative solutions
4. Imperative Reasons of Overriding Public Interest/Derogation

Stage 1 : Screening

This is to determine if an appropriate assessment is required. Screening is the technique applied to determine whether a particular plan would be likely to have significant effects on a Natura 2000 site and would thus warrant an Appropriate Assessment. The key indicator that will determine if an Appropriate

Assessment is required is the determination of whether the development is likely to have significant environmental effects on a Natura 2000 site or not.

Stage 2. Appropriate Assessment

This step is required if the screening report indicates that the development is likely to have a significant impact on a Natura 2000 site. Stage 2 assesses the impact of a plan or project on the integrity of the Natura 2000 site, either alone or in combination with other plans or projects, with respect to the site's structure, function and conservation objectives. Where there are adverse impacts, an assessment of the potential mitigation of these impacts is also required.

Stage 3. Assessment of Alternative Solutions

If it is concluded that, subsequent to the implementation of measures, a plan or project will have an adverse impact on the integrity of a Natura 2000 site, it must be objectively concluded that no alternative solutions exist before the plan or project can proceed.

Stage 4. Imperative Reasons of Overriding Public Interest/Derogation

Where no alternative solutions exist and where adverse impacts remain but imperative reasons of overriding public interest (IROPI) exist for the implementation of a plan or project, an assessment of compensatory measures that will effectively offset the damage to the Natura 2000 site will be necessary.

Flynn, Furney Environmental Consultants Ltd has been appointed by Bluemont Developments Limited to undertake the first stage of the above process: a screening exercise to determine whether the proposed development has the potential to have any significant or indeterminate impacts on the conservation objectives and overall integrity of any Natura 2000 sites.

This assessment is based upon desk study and fieldwork carried out by suitably qualified ecologists. Sites within 15km of the proposed development and all other relevant sites are reviewed for potential impacts or pathways for impacts. Section 3 of the report comprises the AA Screening that specifically focuses on the potential for impacts on Natura 2000 sites and their conservation objectives.

1.2 Description of the Proposed Development

The proposed development seeks to provide for the demolition of all existing structures on site, including the 2-storey building formally used as public house ancillary off-licence & associated structures on the east of the site; a 2-storey building comprising an existing barber shop and betting office to the west of the site; single-storey cottage building and associated structures in the centre of the site; and gated entrance from Mount Carmel Park.

The proposal includes the construction of 100 no. residential units within 2 no. blocks ranging in height from 3- 5-storeys (over lower ground floor and basement level) comprising; 96 no. apartments, (providing 3 no. studio units, 45 no. 1-bedroom units, 9 no. 2-bedroom (3-person) units, 36 no. 2-bedroom (4-person) units, and 3 no. 3-bedroom units); and 4 no. duplex units (providing 2 no. 1-bedroom units and 2 no. 2-bedroom (4-person) units). The apartment blocks will consist of the following:

- Block 01 – 5-storey apartment block (3-storeys rising to 5-storey over basement levels) comprising 48 no. apartment units as follows: 2 no. studio units, 22 no. 1-bedroom units, and 20 no. 2-bedroom apartments units, along with 4 no. duplex units comprising 2 no. 1-bedroom units and 2 no. 2-bedroom duplex units. Each unit will have its own private open space in the form of a private balcony or terraced area.
- Block 02 – 5-storey apartment block (over basement levels) comprising 52 no. apartment units as follows: 1 no. studio unit, 23 no. 1-bedroom units, and 25 no. 2-bedroom units, and 3 no. 3-bedroom units. Each unit will have its own private open space in the form of a private balcony or terraced area.

The development will also provide for 355 sq. m. of non-residential/commercial development as follows:

- 1 no. café and 1 no. office located at ground floor level of Block 01 fronting onto Firhouse Road;
- 1 no. creche and associated play area to the rear of Block 01;
- 1 no. barbershop at ground floor level located between Block 01 and Block 02 fronting Firhouse Road;
- 1 no. bookmaker and 1 no. medical consultancy at ground floor level of Block 02, fronting onto Firhouse Road.

The proposed development will provide for 80 no. car parking spaces including accessible parking and Electric Vehicle parking across basement and lower ground floor levels; set down area; 270 no. bicycle parking spaces; 8 no. motorbike parking spaces; landscaping, including communal open space and public open space and children's play spaces; SuDS measures; boundary treatment; public lighting; ESB substation; plant and waste storage areas; associated signage details; all associated site and infrastructure works necessary to facilitate the development, including the relocation of existing watermain and surface water sewer on the site; vehicular access to the development will be via the exiting access off the Firhouse Road, with 1 no. pedestrian and cyclist access from Firhouse Road and 1no. pedestrian and cyclist access from Mount Carmel Park.

1.3 Stakeholders and Consultation

Table 1: Summary of Consultations

Stakeholder	Nature of Consultation	Outcome
Tom Philips & Associates Ltd (Town Planners, on behalf of the client)	Site visit Scope of project agreed Need for this assessment agreed	• Site visits & Assessments Completed. • Desktop Research carried out • Appropriate Assessment Screening carried out • Non-requirement for a Stage II Appropriate Assessment confirmed.
National Parks and Wildlife Service	This report to be forwarded to Development Applications Unit if required.	Pending (as required).

1.4 The Source-Pathway-Receptor Approach

Consideration has also been given to the 'source-pathway-receptor approach.' This is a standard tool in environmental assessment.

The source-pathway-receptor concept in ecological impact assessment relates to the idea that for the risk of an impact to occur, a 'source' is needed, e.g. a construction site; then a 'receptor', in this case, sites designated for nature conservation; and finally a 'pathway' between the source and the receptor, this could be a watercourse that links the development site to the designated site. Even though there might be a risk of an impact that does not mean that it might necessarily occur, and if it does occur, it may not be significant. Identification of a risk means that there is a possibility of ecological or environmental damage occurring, with the level and significance of the impact depending upon the nature and exposure to the risk and the characteristics of the receptor (in this instance, this is any Natura 2000 sites).

1.5 Zone of influence

The proximity of the proposed development area to European sites, and Qualifying Interests (Qis)/ Special Conservation Interests (SCIs) of European sites, is of importance when identifying potentially likely significant effects. During the *initial* scoping of this report, a 15 km ZoI was applied for impact assessment. A conservative approach has been used, which minimises the risk of overlooking distant or obscure effect pathways, while also avoiding reliance on buffer zones within which all European sites should be considered. This approach assesses the complete list of all QIs/SCIs of European sites in Ireland (i.e. potential receptors), instead of listing European sites within buffer zones.

This follows Irish departmental guidance on AA:

"*For projects, the distance could be much less than 15 km, and in some cases less than 100m, but this must be evaluated on a case-by-case basis with reference to the nature, size and location of the project, and the sensitivities of the ecological receptors, and the potential for in combination effects*" (DoEHLG, 2010, p. 32). Following the guidance set out by the National Roads Authority (NRA, 2009), the proposed development has been evaluated based on an identified ZoI with regard to the potential impact pathways to ecological features (e.g. mobile and static). The ZoI of the proposed development on mobile species (e.g. birds, mammals, and fish), and static species and habitats (e.g. saltmarshes, woodlands, and flora) is considered differently. Mobile species have 'range' outside of the European site in which they are QI/SCI. The range of mobile QI/SCI species varies considerably, from several metres (e.g. in the case of whorl snails Vertigo spp.), to hundreds of kilometers (in the case of migratory wetland birds). Whilst static species and habitats are generally considered to have ZoIs within close proximity of the proposed development, they can be

significantly affected at considerable distances from an effect source; for example, where an aquatic QI habitat or plant is located many kilometres downstream from a pollution source. Hydrological linkages between the proposed development and European sites (and their QIs/SCIs) can occur over significant distances; however, any effect will be site specific depending on the receiving water environment and nature of the potential impact. A reasonable worst-case ZoI for water pollution from the proposed greenway is considered to be the surface water, wherein the proposed works are to be located. The likely effects of the proposed development on European sites has been appraised using a source-pathway-receptor model, as described above in Section 1.4.

2 ECOLOGICAL ASSESSMENT WORKS

2.1 Desktop Study

A desktop study was carried out as part of the screening process. This included a review of available literature on the site and its immediate environs. Sources of information included the National Parks and Wildlife Service and National Biodiversity Data Centre databases on protected sites and species. Additionally, a number of databases on individual protected species and non-native invasive species were consulted.

2.2 Designated Sites

Sites designated for the conservation of nature in Ireland include:

- Special Areas of Conservation (SACs) and:
- Special Protection Areas (SPAs).
- Natural Heritage Areas (NHAs)
- proposed Natural Heritage Areas (pNHAs)

SPAs and SACs form the *Natura 2000* network of sites. It is these sites that are of relevance to the screening process for this Appropriate Assessment.

SPAs and SACs are prime wildlife conservation areas in the country, considered to be important on a European as well as Irish level. SPAs and SACs are designated under EU Habitats Directive, transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), as amended.

All Natura 2000 designated sites within 15km of the site and other relevant sites with regard to the source-pathway-receptor model were considered during the desktop study stage of this screening assessment in order to assess the potential for significant effects upon their Qualifying Interests / Special Conservation Interests and Conservation Objectives. This stage of the process is used to determine whether any of the designated sites may be 'screened out'. That is, that they can be regarded as not being relevant to the process, having no potential to be significantly affected or impacted upon.

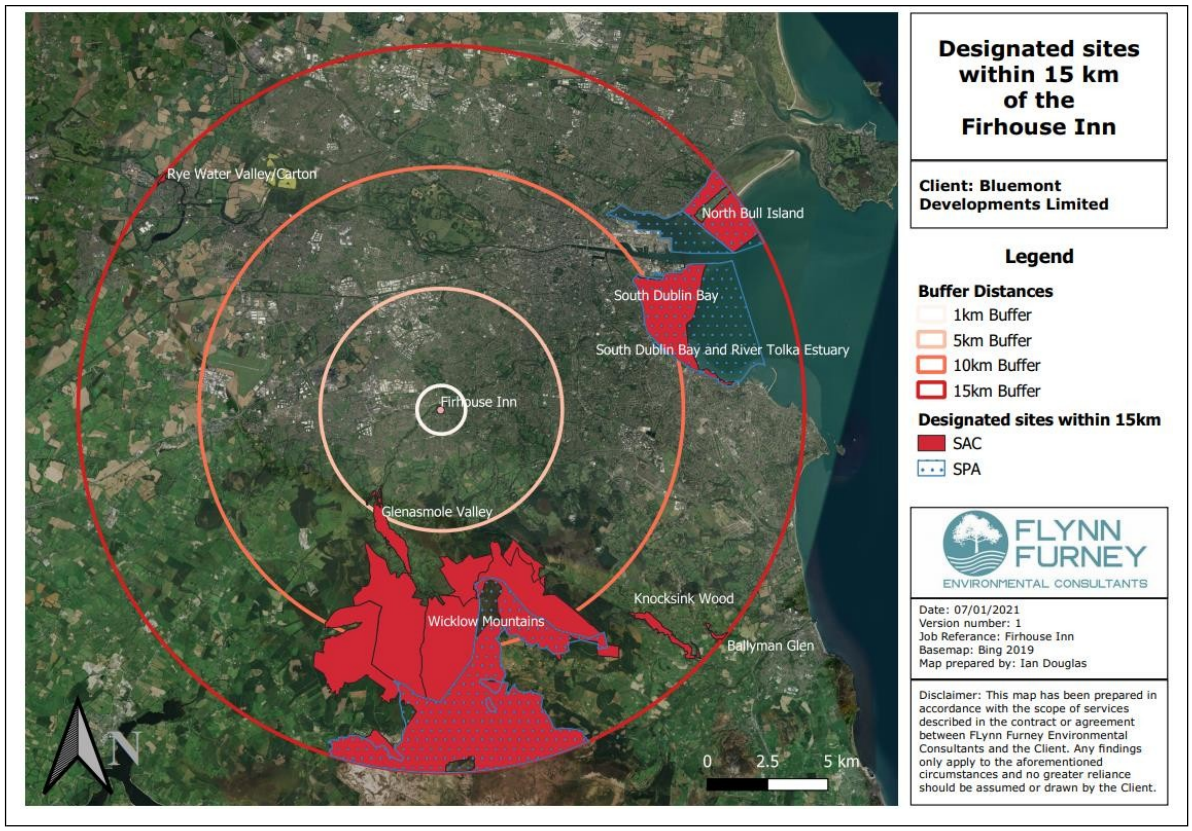
2.3 Designated Sites Within 15km of the Proposed Works and other Relevant Sites

All Natura 2000 designated sites within 15km of the proposed works and other relevant sites within a potential zone of influence of the proposed works were considered during the screening process for their potential to have significant effects upon their qualifying interests or conservation objectives. The site synopses and conservation objectives of the sites (as available) were also examined during this stage of the survey. These sites are given in the table below. The table also gives distance from the proposed site of works and the outcome of the screening.

Table 2: Distances from the proposed developments to the nearest designated sites

Site Code	Site Name	Designation	Distance from designated site	Likelihood of impact
1209	Glenasmole Valley SAC	SAC	3.9km	None identified
2122	Wicklow Mountains SAC	SAC	6.0km	None identified
4040	Wicklow Mountains SPA	SPA	7.2km	None identified
210	South Dublin Bay SAC	SAC	9.3km	None identified
4024	South Dublin Bay and River Tolka Estuary SPA	SPA	9.3km	None identified
725	Knocksink Wood SAC	SAC	11.4km	None identified
4006	North Bull Island SPA	SPA	11.5km	None identified
206	North Dublin Bay SAC	SAC	13.1km	None identified
713	Ballyman Glen SAC	SAC	14.2km	None identified
1398	Rye Water Valley/Carton SAC	SAC	14.8km	None identified

Figure 1: Designated sites within 15km



No risks to the conservation objectives of any Natura 2000 sites are considered likely due one or more of the following:

- Lack of direct connectivity between the proposed works areas and the designated areas
- Significant buffer between the proposed works area and the designated area
- The nature of the site's conservation objectives
- No impact or change to the management of the designated area or;
- No change to chemical or physiological condition of the designated site as a result of the proposed development.

The proposed development is not considered likely to give rise to any significant impacts on any Natura 2000 designated sites. The development does not have potential for any *direct* impacts given its location (outside and removed from any such sites) and nature (works within a built area and no semi-natural or natural areas to be affected). No *indirect* impacts are predicted on any Natura 2000 sites. This is due to the relatively small scale and limited nature of the proposed works. The nearest Natura sites to the

Firhouse Inn are Glenasmole Valley SAC and Wicklow Mountains SAC. These are to the south of the project and upstream of the project's location close to the River Dodder. There is thus no likely path for any impacts to these sites. There is no direct hydrological connectivity to any Natura site. The proposed development site is located within 0.2km of the River Dodder. This watercourse connects to South Dublin Bay SAC and South Dublin Bay and River Tolka Estuary SPA. Storm water from the site will discharge to an existing surface water system which will eventually discharge to the River Dodder. However, as this surface water route from the site currently exists, no additional potential for impacts has been identified. The distance between these above designated sites and proposed works location contributes to the lack of any likely impact

2.4 Field Surveys

Initial field surveys were carried out in September 2020 and January 2021 and the baseline ecological conditions were assessed. Habitats were identified, mapped and classified and dominant plant species noted according to the guidelines given by the JNCC (2010) and Smith et al. (2011). Any signs of mammals seen were recorded as part of these surveys. A dedicated bird survey was not carried out as part of the survey. However, any species observed were noted and recorded. Any suitable habitat for amphibian and reptile species was recorded. Habitat classification followed Fossitt (2000) and the floral nomenclature used follows Parnell and Curtis (2012) and Scannell and Synnott (1987). Subsequent surveys of the existing buildings for bat roosts and bat roosting habitat in the grounds were also carried out in 2021 and 2022. A dedicated bird nesting activity survey and a survey specifically for invasive species were also carried out in 2022.

2.5 Detailed Description of Habitat Areas

A detailed description of habitat areas recorded within or adjacent to the survey area is given below. The area under study is comprised almost entirely of recent buildings and other artificial surfaces (BL3) which includes the former Firhouse Inn, other buildings and the car park.

Other habitats types within and surrounding the proposed development include:

2.5.1 Treelines (WL2)

The proposed site of works is bounded to the north, north-west and west by a mature treeline. This is a mixed treeline that is made up of mature Sycamore (*Acer pseudoplatanus*), Beech (*Fagus sylvatica*) and Horse Chestnut (*Aesculus hippocastanum*). Sycamore is probably the most numerous of the three species. The trees are large (up to 20m in height and with a canopy spread of up to 8m).

2.5.2 Improved agricultural grassland (GA1)

The lands immediately adjacent to the existing Firhouse Inn and curtilage would conform to this category. This is a relatively species-poor habitat type that is dominated by a few agricultural grasses such as Cocksfoot (*Dactylis glomerata*) and Bent grasses (*Agrostis* spp.). Other abundant plants here include Creeping Buttercup (*Ranunculus repens*) and White Clover (*Trifolium repens*). These lands have been grazed in recent times.

2.5.3 Amenity Grassland

This habitat type occurs in the lands to the north of the site and the agricultural grassland described above. This habitat type makes up much of the Dodder Valley Linear Park which is within around 100m of the site proposed for development. This grassland type is also rather species-poor and dominated by a few grass species such as Bent grasses and Meadow grasses. Clovers (*Trifolium* spp.) are abundant here and Plantains (e.g. *Plantago lanceolata*) and Thistles (*Cirsium* spp.) are occasional.

2.5.4 Scrub (WS1)

Some limited areas of scrub occur on the edges of the agricultural fields and on the boundaries of the Dodder Valley Linear Park. These areas are dominated by Bramble (*Rubus fruticosus* agg.) along with some limited Blackthorn (*Prunus spinosa*).

2.5.5 Significance of Habitats

None of the habitats occurring within or surrounding the site are of high sensitivity, most of the area having been modified from its natural state by development. There are is no Annex I habitats occurring within the area proposed for works. No rare, threatened or protected species of plants as per the Red Data List (Wyse Jackson et al 2016) were found. No species listed in the Flora Protection Order (2022) were found to be growing within the site.

2.6 Fauna

2.6.1 Mammal Activity

No evidence of presence or activity of any protected mammal species was noted within the site. It is noted that records of Otter (*Lutra Lutra*) exist from the Dodder. It is also noted that suitable habitat for Badger (Meles meles) exists within the agricultural lands and adjacent Dodder Valley Park. However, no refugia of these species was found within the area under survey and the site proposed for development would not hold any suitable habitat for these species.

2.6.2 Bats

A number of bat surveys including dedicated search for bat habitation (by Flynn Furney Environmental Consultants October 2020 - June 2023) were carried out as part of the surveys contributing to this report. No bats or evidence of bat presence was noted in any of the buildings here. However, further surveys are recommended prior to any construction at this site. Detailed reports on these surveys have been compiled for the client and are to be submitted with this report.

2.6.3 Breeding Birds

Birds seen and heard during the initial site surveys were recorded. All of the birds recorded were species typical of this kind of an urban fringe environment. These included Blue and Great Tits (*Parus caeruleus*), Robin (*Erithacus rubecula*), Wren (*Troglodytes troglodytes*) and Blackbird (*Turdus merula*). No 'red-listed' species or birds of higher conservation concern were noted.

A dedicated breeding bird survey of the building and adjacent mature trees was carried out in April 2022. No bird nesting activity was found within the buildings and the curtilage here. Likely breeding of Wood Pigeon (*Columba palumbus*) was recorded within the treeline of mature trees adjacent the site. A detailed report on this survey has been compiled for the client and is to be submitted with this report.

The Dodder river which is close to the site is known to support a number of protected bird species including Kingfisher (*Alcedo atthis*), Dipper (*Cinclus cinclus*), Coot (*Fulica atra*), Moorhen (*Gallinula chloropus*) and Grey Wagtail (*Motacilla cinerea*). The Dodder is not within the zone of influence of the proposed development.

2.6.4 Wintering Wildfowl

No suitable habitat for these species is found within the site under survey.

2.6.5 Freshwater Species, Reptiles and Amphibians

There are no watercourses within the site proposed for works. The entire site was surveyed for the presence of the Common Frog (*Rana temporaria*), Smooth Newt (*Lissotriton vulgaris*) and the Common Lizard (*Lacerta vivipara*). There are no suitable breeding sites for these species within the site. The River Dodder was recorded within 200 meter of the site. The Dodder is likely to support at least Common Frog (*Rana temporaria*) and possibly Lizard (*Lacerta vivipara*). The Dodder river is outside the zone of influence of the proposed development.

2.6.6 Significance of Fauna

No species listed on Annex II of the Habitats Directive were found to be occurring on the site. No evidence of any protected mammal species within the site was found during survey. While all bird species are protected to some extent under Irish legislation, the habitat types found here do not offer nesting habitat for any (Birds Directive) Annex species.

2.6.7 Invasive Species

Dedicated invasive species surveys of the site were carried out in April 2022 and July 2023. No invasive species listed on the Schedule 3 of the European Communities (Birds and Natural Habitats) Regulations 2011 were found during the survey. Detailed reports on these surveys have been compiled for the client and are to be submitted with this report.

2.7 Recommendations Arising from Ecological Survey

The following recommendations are made with regard to the ecological interests of the site:

Table 3: Ecological Recommendations

Ecological Interest	Recommendation
Mature Hedgerows/Treelines	All of the existing mature trees should be retained. All construction activities should be planned so as to avoid any impacts. A buffer zone to protect these is recommended.
Bats	A preconstruction survey of the site is recommended as bat habitation may occur before commencement of works. Ecologist supervision of a portion of the works is also recommended.
	It is recommended that a bat expert is engaged to assist with the lighting design proposals for the site. This is to prevent any ongoing impacts to bat species.
Breeding Birds	A preconstruction survey of the site is recommended as bird nesting may occur before commencement of works. No woody vegetation should be removed during the bird nesting season (March-August inclusive).
Invasive Species	A medium impact species – Buddleia – should be removed from the site on the commencement of site clearance.

3 ARTICLE 6(3) SCREENING ASSESSMENT

This section of the report focuses solely on the potential for the proposed works to impact upon Natura 2000 sites. Section 2.1.2 of this report excluded any direct impacts or pathways for impacts on any Natura 2000 sites. This was based upon the proximity of the designated sites to the proposed development. The potential for impacts on the Natura 2000 sites is considered below.

3.1 Article 6(3) Assessment Criteria

3.1.1 Description of the individual elements of the project likely to give rise to impacts on the Natura 2000 site.

None of the individual elements of the proposed development as planned are likely to give rise to significant impacts on the Natura 2000 sites, given the limited scale of the works and location of the works as planned.

3.1.2 Description of any Likely Direct, Indirect or Secondary Impacts of the Project on the Natura 2000 Site.

Any likely direct, indirect or secondary impacts of the proposed development, both alone and in combination with other plans or projects, on any Natura 2000 sites by virtue of the following criteria: size and scale, land take, distance from the Natura 2000 site or key feature thereof, resource requirements, emissions, excavation requirements, transportation requirements and duration of construction, operational and decommissioning phases of the works are detailed in the table below.

Table 4: Assessment of Likely Impacts

ASSESSMENT OF LIKELY IMPACTS	
size and scale	The proposed works site is of approximately 0.5 hectares in surface area. There will be no impact on any Natura 2000 Sites owing to size or scale of the proposed works.
land-take	No works are proposed within any designated site. Works will not alter the size of any designated sites. Therefore land-take is nil.
Distance from the Natura	Glenasmole Valley SAC is the nearest designated site at a remove of 3.9km.

2000 site or key features of the site;	
Resource requirements (water abstraction etc.);	No materials for construction will be sourced from within any Natura 2000 Site. No water will be abstracted from the site during the construction or operation of the proposed development. Mains water will be used for the operational phase of the project. Therefore, there will be no impact on any Natura site as a result of resource requirements.
emissions (disposal to land, water or air);	There will be no additional emissions of water from the site. Drainage and wastewater will be to existing mains. No emissions are predicted that will impact upon any Natura 2000 site.
excavation requirements;	No excavations will take place within any Natura 2000 Site. Construction works will be entirely within area as identified in this reporting.
Transportation requirements;	Site has existing access via a regional road (R114) and adjacent local road. No other means of access will be required during any phase of the project.
Duration of construction, operation, decommissioning, etc.;	Duration of works not known at time of writing. However, these works are expected to be completed within 12-24 months.
Timing of works	Works shall be timed to minimise disturbance to native species. No woody vegetation is to be cleared or otherwise impacted upon during the bird nesting season (March-August inclusive).
Cumulative or In-combination Impacts with other Projects and Plans	A number of other projects have been considered as part of the screening process. A search of South Dublin Country Councils planning web portal was carried out as part of this desktop study. A number of planning applications were reviewed; the greater majority of these related to the construction, demolition or alteration of private dwellings, commercial or residential developments (e.g. SD23A/0240 and SD22A/0356). It was noted that an apartment development (SD15A/0336) for adjacent lands was refused in 2015. A more recent social housing development (SD18B/0002) was approved for nearby lands. Plans that may be relevant to this area and development were also reviewed. These included the South Dublin County Council Development Plan (2022-2028) and the Green Infrastructure Plan for the county. No cumulative or in-combination impacts were identified as part of this process. No cumulative or in combination impacts are therefore predicted.

3.2 Description of any Likely Changes to the Natura 2000 Sites

Any likely changes to the Natura 2000 site are described in the table below with reference to the following criteria: reduction of habitat area, disturbance to key species, habitat or species fragmentation, reduction in species density, changes in key indicators of conservation value and climate change.

Table 5: Likely changes to the Nature 2000 site

Likely Changes to the Natura 2000 Site	
Reduction of habitat area	No works will take place within the boundary of any Natura 2000 sites. There will be no loss of habitat within any Natura 2000 site as a result of the proposed development.
Disturbance to key species	All works associated with the proposed development will take place outside the boundaries of the Natura 2000 sites. None of the qualifying interests of the nearest Natura 2000 sites were recorded during survey. No loss of or impacts upon habitats of the qualifying interests of the nearest Natura 2000 site is predicted. No significant impacts on any key species have therefore been considered likely.
Habitat or species fragmentation	There will be no works within any SAC or SPA. No impacts on any qualifying species are predicted. Therefore, there will be no impact within any Natura 2000 sites with regard to habitat or species fragmentation.
Reduction in species density	No reduction in species density is considered likely within any SAC or SPA as a result of the proposed works.
Changes in key indicators of conservation value (water quality etc.);	Habitat integrity is the most relevant of the key indicators of conservation value with regard to the nearest Natura 2000 site. However, the risk of any significant impacts on Habitat integrity within this site during the construction phase can be excluded due to the significant remove of the designated site, the nature of the works and absence of any direct connectivity with the development. There will be no impacts on any habitat areas outside the site.
Climate change	No damage to any Natura 2000 site as a result of or in combination with enhanced climate change is predicted as a result of the proposed

	development.

3.2.1 Likelihood of Interference with the key relationships that define the structure and function of the Natura 2000 Site as a whole:

It is not considered likely that the proposed development will interfere with any of the key relationships of any Natura 2000 site. It is considered that there will be no long term residual impacts from the proposed works upon the key relationships that define any Natura 2000 sites.

3.2.2 Indicators of Significance as a Result of the Identification of Effects

Indicators of significance as a result of the identification of effects as set out below in terms of loss, fragmentation, disruption, disturbance and changes to the key elements of site.

Table 6: Indicators of significance

Indicators of Significance	
Loss	There will be no loss of habitat within any Natura 2000 site as a result of the proposed works. It is not anticipated that the loss of any species of conservation interest will occur as a result of the proposed works due to injury or mortality.
Fragmentation	No habitat fragmentation to any Natura 2000 site is predicted.
Disruption	No significant risk of disruption to any Natura 2000 sites are likely during this project.
Disturbance	As above
change to key elements of the site (e.g. water quality etc.)	No changes to any key elements of any Natura 2000 site are predicted as a result of the proposed development.

Description of any Likely Significant Impacts or Indeterminate Impacts of the Project on the Natura 2000 Site

Based on a consideration of the likely impacts arising from the proposed works and a review of their significance in terms of the conservation interests and objectives of the Natura 2000 Sites screened, no significant impacts have been identified on the Natura 2000 sites as a result of the proposed development.

3.3 FINDINGS OF ARTICLE 6(3) SCREENING ASSESSMENT

Name of project or plan: Large-Scale Residential Development on lands located at No. 2 Firhouse Road and the former 'Morton's The Firhouse Inn', Firhouse Road, Dublin 24

Name and location of Natura 2000 Site: Works will take place on the Firhouse Road Dublin 24. The nearest designated site is Glenasmole Valley SAC 3.9km removed from the proposed site of works.

Description of project or plan: The proposed development seeks to provide for the demolition of all existing structures on site, including the 2-storey building formally used as public house ancillary off-licence & associated structures on the east of the site; a 2-storey building comprising an existing barber shop and betting office to the west of the site; single-storey cottage building and associated structures in the centre of the site; and gated entrance from Mount Carmel Park.

The proposal includes the construction of 100 no. residential units within 2 no. blocks ranging in height from 3- 5-storeys (over lower ground floor and basement level) comprising; 96 no. apartments, (providing 3 no. studio units, 45 no. 1-bedroom units, 9 no. 2-bedroom (3-person) units, 36 no. 2-bedroom (4-person) units, and 3 no. 3-bedroom units); and 4 no. duplex units (providing 2 no. 1-bedroom units and 2 no. 2-bedroom (4-person) units). The apartment blocks will consist of the following:

- Block 01 – 5-storey apartment block (3-storeys rising to 5-storey over basement levels) comprising 48 no. apartment units as follows: 2 no. studio units, 22 no. 1-bedroom units, and 20 no. 2-bedroom apartments units, along with 4 no. duplex units comprising 2 no. 1-bedroom units and 2 no. 2-bedroom duplex units. Each unit will have its own private open space in the form of a private balcony or terraced area.
- Block 02 – 5-storey apartment block (over basement levels) comprising 52 no. apartment units as follows: 1 no. studio unit, 23 no. 1-bedroom units, and 25 no. 2-bedroom units, and 3 no. 3-bedroom units. Each unit will have its own private open space in the form of a private balcony or terraced area.

The development will also provide for 355 sq. m. of non-residential/commercial development as follows:

- 1 no. café and 1 no. office located at ground floor level of Block 01 fronting onto Firhouse Road;
- 1 no. creche and associated play area to the rear of Block 01;
- 1 no. barbershop at ground floor level located between Block 01 and Block 02 fronting Firhouse Road;

- 1 no. bookmaker and 1 no. medical consultancy at ground floor level of Block 02, fronting onto Firhouse Road.

The proposed development will provide for 80 no. car parking spaces including accessible parking and Electric Vehicle parking across basement and lower ground floor levels; set down area; 270 no. bicycle parking spaces; 8 no. motorbike parking spaces; landscaping, including communal open space and public open space and children's play spaces; SuDS measures; boundary treatment; public lighting; ESB substation; plant and waste storage areas; associated signage details; all associated site and infrastructure works necessary to facilitate the development, including the relocation of existing watermain and surface water sewer on the site; vehicular access to the development will be via the exiting access off the Firhouse Road, with 1 no. pedestrian and cyclist access from Firhouse Road and 1no. pedestrian and cyclist access from Mount Carmel Park.

Is the project or plan directly connected with or necessary to the management of the site?: The project is not directly connected with or necessary to the management of any Natura 2000 sites.

Are there other projects or plans that together with the project or plan being assessed could affect the site (provide details)? On the basis that the proposed project will have no impacts on any Natura 2000 sites, no cumulative or in combination impacts are predicted.

3.3.1 Assessment of Significance of Effects

Describe how the project or plan (alone or in combination) is likely to affect the Natura 2000 site:
The proposed project will not significantly affect any Natura 2000 sites.

Explain why these effects are not considered significant
There will be no direct impacts upon the Natura 2000 Sites as:

- No works will take place within any Natura 2000 Site.
- No resources of any Natura 2000 site will be affected by works. There will be no indirect impacts upon the Natura 2000 Sites as:
- The project is small in scale and limited in duration.
- There is no direct hydrological connectivity between the site and designated sites.

Indirect impacts upon the Natura 2000 Site:

- None.

Consultation with Agencies

- Consultation with the client to establish the requirement for this report.

3.4 Data collected to carry out the assessment

The following sources of data were employed:

- Environmental Protection Agency Database
- NPWS protected species database and online mapping
- Historical OSI Maps
- NPWS protected species database and online mapping.
- South Dublin County Council Planning Database

Level of assessment completed

- Desk Study
- Site visits and surveys between September 2020 and June 2023
- JNCC Phase 1 Habitat Assessment
- Fossitt Level III Habitat Recording
- Dedicated Bat Surveys (including building searches and emergence watches)
- Dedicated Bird nesting activity surveys
- Dedicated surveys for invasive species.

Overall Conclusions

In view of the best and objective scientific knowledge and in view of the conservation objectives of the European sites reviewed in the screening exercise, the proposed development as described here, individually/in combination with other plans and projects (either directly or indirectly) is not likely to have any significant effects on any of the European sites. Therefore, it is recommended to An Bord Pleanála that Appropriate Assessment is not required.

4 References

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Appendix 1: Site Photos

Fig. 1. The existing Firhouse Inn

Fig. 2. View of Firhouse Inn and car park and R114 extending westward toward M50.

Fig. 3. Mature Beech trees to the north of the existing Firhouse Inn car park

Fig. 4. Agricultural grassland and dividing treelines to the northwest of the site

FIRHOUSE INN

BAT ECOLOGIST SURVEY REPORT

Date:	4th October 2024
Ecologist:	Aidan Murphy
Weather:	Dusk emergence survey on 19/9/'24. 100% cloud. Temp 14°C. No wind. No rain

Introduction

Aidan Murphy Ecologist was commissioned by Flynn Furney Environmental Consultants to undertake a pre demolition bat emergence survey and buildings inspection which included the Firhouse Inn, extensions to the rear of the structure and an adjacent cottage.
The dusk emergence survey was undertaken by Aidan Murphy on the 19th September and the survey of the building's interior and exterior on 25th September 2024.
The aim of the bat survey was to confirm the:

- Potential for the structures on site to support roosting bats;
- Presence of roosting bats at these structures;
- If present, identify the species roosting at the structure and the estimated number of bats roosting at the structure.

The results of the bat survey and recommendations arising from the survey findings are presented in this report.

Aidan Murphy holds a BSc (Hons) in Wildlife Biology and an MSc in Ecological Assessment (UCC). Aidan has worked for nine years as a freelance ecologist with survey experience including bats, birds, freshwater & terrestrial invertebrates, and botanical surveys.
Aidan holds a National Parks & Wildlife Service (NPWS) licence to survey bat roosts (NPWS Bat Survey Licence No.: DER/BAT 2024-69, expiry date: 31st December 2024).

DUSK EMERGENCE SURVEY FOR BATS DATE: 19 SEPEMBER 2024

Activity on site	Results/ **Actions Required**
Dusk emergence survey for bats commencing 11 minutes before sunset (sunset: 19:31). Survey duration: 19:20 to 20:50 **Methodology**: Surveys were conducted using an Anabat Scout (full spectrum bat detector) and Echometer Touch Pro bat detector. Survey observation positions were taken from the north-east and north-west corners of the main building. In addition, to supplement the surveys, Infra-red (IR) cameras were deployed. The cameras were set up to face potential access features and cameras were equipped with additional IR lights.	No bats observed/recorded emerging from subject buildings. No bat roosts recorded. 2 species of bat recorded foraging / commuting through the rear (north) of the site: common pipistrelle and Leisler's bat. Bats were not connected with any of the onsite buildings. --- Undertake the demolition works ASAP in the autumn month of October or in the spring months of March and April. Should demolition works commence and bats be found within the buildings unexpectedly, all works should cease immediately and Flynn Furney and NPWS be contacted.

BUILDING SURVEY FOR BATS DATE: 25 SEPEMBER 2024

Activity on site	Results/ **Actions Required**
Roost Assessment for Bats: Exterior and interior, all parts of buildings which were accessible were inspected. **Survey Duration: 11:00 to 14:00** **Methodology:** The surveys identified any potential roost features or evidence of use by bats. Evidence for bats sought are dead and live animals, droppings, discarded insect remains, urine stains, and greasy marks at entrances to structural crevices and gaps where bats may possibly roost.	The results of the surveys undertaken confirm that the existing buildings within the proposed development are not currently used by bats for roosting purposes. The present surveys carried out in September 2024 are a 'snapshot' in time and the absence of a species or evidence of their presence, does not preclude their presence at a later date. --- **Undertake the demolition works ASAP in the autumn month of October or in the spring months of March and April.** **Should demolition works commence and bats be found within the buildings unexpectedly, all works should cease immediately and Flynn Furney and NPWS be contacted.**

Photo record, 25th September 2024. No signs of bats noted in interior and exterior of buildings.

Main building, south and east elevations


Main building, elevation


Cottage & main building


Front elevation of cottage


Rear, flat roof extensions


2nd floor exterior of kitchen


Rear flat roof extensions

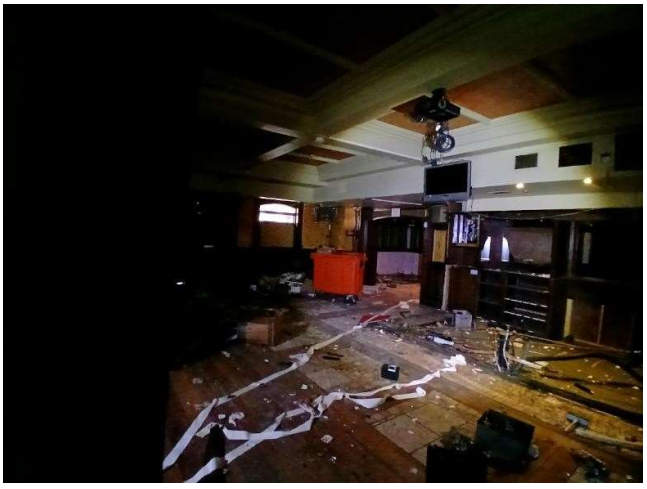

Rear storage shed


Interior 2nd floor kitchen


Main building, attic


Cottage attic


Main building, upper room



Main building, lounge, first floor

Main building, flat roof interior

Main building, basement

Still image from infra-red video, rear of cottage

Still image, Firhouse Inn, rear

Still image, Firhouse Inn west elevation & cottage rear

Aidan Murphy

4th October 2024

Signed: Aidan Murphy

Date