

Screening for Environmental Impact Assessment Report

Residential Development at Broomhill Road, Tallaght, Dublin 24.

Garyaron Homes Ltd.

May 2022



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1. Introduction

Garyaron Homes intends to apply to An Bord Pleanála (ABP) for planning permission of five years duration for a Strategic Housing Development (SHD) scheme on lands at Broomhill Road, Tallaght, Dublin 24, D24 XA52 and Unit 51, Broomhill Road, Tallaght, Dublin 24, D24 E124 on a site measuring approximately 1.4 hectares. Strategic Housing Development (SHD) applications are applications for planning permission that go directly to An Bord Pleanála. These applications are used for certain housing developments such as those of 100 or more houses, or for student accommodation units¹.

Permission is being sought for the demolition of the existing on-site buildings and the subsequent construction of 242 no. apartment units in 5 no. blocks (Blocks A to E) that range in height from 4 to 7 storeys, in addition to the construction of residential amenity areas, a childcare facility/crèche, communal open spaces, co-working spaces, café, landscaped public spaces, and all associated works and services.

This Screening for Environmental Impact Assessment (EIA) Report of the proposed works has been prepared by Malachy Walsh and Partners Engineering and Environmental Consultants (MWP) to accompany the application. An Ecological Impact Assessment (EcIA) Report and a Screening for Appropriate Assessment (AAS) Report have also been prepared by MWP in relation to the proposal.

1.1 Purpose of the Screening

The purpose of this Screening for EIA Report is to detail findings from a desktop assessment of the proposed works in Tallaght to establish the likely effects on the environment, and advise if an EIA would be appropriate for the proposal. Under European Union (EU) and Irish legislation, an EIA is required for certain prescribed projects which are likely to have significant impacts on the environment by reason of their nature, extent or location. This legislation is examined in the following section.

1.2 Statement of Competency

This Screening for EIA Report has been prepared by Úna Williams (*MSc., BSc.*), an environmental scientist and ecologist at MWP. Úna has almost four years' experience as an environmental and ecological professional and has worked at MWP for nearly three years in which time she has completed numerous ecological assessments and reports including Screening for EIA Reports, Natura Impact Statements (NIS) and Ecological Impact Assessments (EcIA). She is an appropriately trained and qualified professional with ample fieldwork and survey experience both in Ireland and abroad.

1.3 Legislative Context for the Project

The types of projects that may require EIA are set out in EU and Irish legislation. Annex I of the Directive 2014/52/EU defines mandatory projects that require EIA on the basis that these project types will always have significant environmental effects. The Broomhill Road project type (housing scheme/infrastructure projects) is not listed under Annex I of the Directive.

Annex II project types are subject to thresholds which, in Irish legislation, are defined in the 2011 Planning and Development Regulations under the Fifth Schedule, Part II, Infrastructure Projects (b) (i). These thresholds are set

¹ Housing SHD | An Bord Pleanála (pleanala.ie) [Accessed: 28th April 2022]

at levels that distinguish the projects deemed likely to have significant effects on the environment from the projects that are not by virtue of the project's nature, size and/or location.

In accordance with the regulations, EIA is required for the construction of 500 dwellings. The Broomhill Road project concerns 242 no. apartment units and is therefore considered 'sub-threshold'. This Screening for EIA Report examines whether the proposal to construct and operate the residential scheme is likely to have significant effects on the environment and, ultimately, if EIA is required.

2. Methodology for Annex III Criteria Assessment

The EIA Screening was completed by reviewing the proposed housing development against the criteria included in Annex III of the EIA Directive (2014/92/EU). The criteria are grouped under three headings and are used to help in the screening process to determine whether a development is likely to have a significant effect on the environment. This complies with the requirements of A120 of the Planning and Development Regulations 2001-2018, which set out the requirements for EIA screening of local authority projects such as this. The criteria are outlined as follows:

Characteristics of proposed development

The characteristics of the projects must be considered with particular focus on:

- the size and design of the whole project
- the cumulation with other existing and/or approved projects
- the use of natural resources, in particular land, soil, water, and biodiversity
- the production of waste
- pollution and nuisances
- the risk of major accidents and/or disasters relevant to the project, including those caused by climate change, in accordance with scientific knowledge
- the risks to human health (for example due to water contamination or air pollution)

Location of proposed development

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

- the existing and approved land use,
- the relative abundance, availability, quality, and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground,
- 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; Natura 2000 areas designated by Member States pursuant to Directive 92/43/EEC and Directive 2009/147/EC
- VI. areas in which there has already been a failure to meet the environmental quality standards laid out in EU legislation 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

Type and characteristics of potential impacts

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

- the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected)
- the nature of the impact
- the transfrontier transboundary nature of the impact
- the magnitude intensity and complexity of the impact
- the probability of the impact
- the expected onset, duration, frequency and reversibility of the impact
- the impact's cumulation with the impact of other existing and/or approved projects
- the possibility of effectively reducing the impact

Article 3(1) of the Directive states:

The environmental impact assessment shall identify, describe and assess in an appropriate manner, in the light of each individual case, the direct and indirect significant effects of a project on the following factors:

- *a)* population and human health
- *b) biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC*
- c) land, soil, water, air and climate
- d) material assets, cultural heritage and the landscape
- *e)* the interaction between the factors referred to in points a) to d)

3. Site Location and Description

The proposed residential development site is located along Broomhill Road within the Broomhill Industrial Estate situated on the northern edge of Tallaght, Dublin City's largest suburb. Tallaght Campus of the Technological University (TUD) lies to the south of the proposal site, and to the north is the suburban residential area of Kilnamanagh. The N81 Tallaght Bypass is located approximately 1 kilometre south of the proposed development



site, while approximately 1.5 kilometres to the northeast is the M50 Western Parkway Motorway. The land at the proposed development site is currently used for industrial and commercial purposes (See **Plate 1**, below) and is located approximately 9 kilometres southwest of Dublin City Centre (see **Figure 1**, below), 6 kilometres southwest of Phoenix Park, and 8.8 kilometres north of the Dublin-Wicklow border in the Wicklow Mountains. The site is found within the 10-kilometre hectad² O02 and has the Irish National Grid Coordinates of 709224, 728492. The proposed development land is located within an area that is zoned "Objective Regen" and all proposed works accord with the zoning.

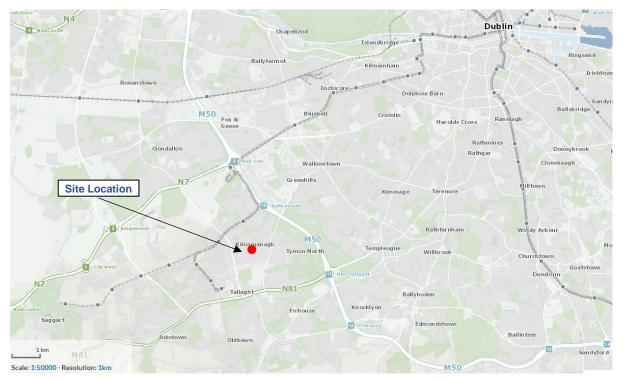


Figure 1: Location of the proposed housing development at Broomhill Road in Tallaght, Dublin 24 [adapted from maps.biodiversity.ie]

The proposed development site is located within the Electoral Division (ED) of Tallaght-Kingswood (CSO Area Code: ED 03036), and Central Statistics Office (CSO) data indicates that in 2016 this ED had a total population of 3,996 resident persons. Of these, 3,514 people occupied a house or bungalow, with the remaining population residing in flats or apartments. In 2016, the average household size in Tallaght-Kingswood ED was 2.83 persons and the home ownership rate was 73.2%. Land-use at the proposed development site is of an industrial nature, and the principal industries operating within the ED are commerce and trade, professional services, and transport and communications³.

The proposal site lies within the townland of Tallaght and is underlain by limestone and calcareous shale. Bedrock at the location and throughout the greater area is described as 'Dark limestone and shale' of the 'Lucan Formation'⁴. Soil type at the site and areas extending away from the site is classified as 'Made/built land'. Within the surrounding areas, the soil is a mosaic of small areas of 'Grey Brown Podzolics/Brown Earths', 'Surface water Gleys/Ground water Gleys', 'Shallow Brown, Earths/Grey Brown, Podzolics, Rendzinas, Lithosols, Some outcropping rock', 'Lithosols, Peats, Some outcropping rock', and 'Mineral Alluvium'. The Corine⁵ (2018) landcover classification of the proposed development site is 'Industrial and commercial units' with areas of 'Discontinuous

² 10 km x 10 km Irish National Grid square

³ Census 2016 Sapmap Area: Electoral Division Tallaght-Kingswood (cso.ie) [Accessed: 26th April 2022]

⁴ <u>Geological Survey Ireland Spatial Resources (arcgis.com)</u> [Accessed: 26th April 2022]

⁵ Co-ORdinated INformation on the Environment – dataseries established by the European Community



urban fabric', 'Green urban areas', and 'Non-irrigated arable land' occurring within the greater area⁶. Vegetation is generally absent from the site although the roadways surrounding the site are sporadically lined with deciduous and conifer trees on managed grass verges (See **Plate 1**, below).



Plate 1. View north from the southern extent of the site (left), and treeline and managed grassy verges in northwest corner of site (right)

Hydrologically, the Broomhill Road site is situated within the Dodder_SC_010 sub-catchment which in turn is itself located within the Liffey and Dublin Bay Catchment (Catchment ID: 09). A 1st Order watercourse (Segment Code: 09_1029), known locally as the Tymon River, lies approximately 400 metres southeast of the proposed development site and immediately west of the TUD Campus. The stream flows north-northeast before forming the River Poddle, approximately 2.1 river km⁷ downstream of the TUD Campus in Tymon Park. The 2nd Order Jobstown Stream is situated approximately 920 metres south of the proposed development site, flowing east alongside the Tallaght Bypass before merging with the River Dodder, approximately 1.4 river km downstream.

The EPA River Waterbody Status (2013-2018) of the Tymon River is 'Unassigned', while the status of the Jobstown Stream is 'Poor'. The nearest downstream EPA river water quality (1971-2020) monitoring station on the River Poddle is located at The Priory, Kimmage Road (Station Code: RS09P030400), approximately 4.8 river km downstream from the TUD Campus. The most recent (2007) evaluation for this station indicates that the River Poddle has a biological water quality value (Q value) of 'Q3 - Poor Status'. This evaluation is based on the composition and abundance of the invertebrate community in the stream at this location. On the River Dodder, the nearest operational downstream EPA river water quality (1971-2020) monitoring station is located at New Bridge, Firhouse (Station Code: RS09D010420), approximately 0.63 river km downstream of the confluence with the Jobstown Stream. The most recent (1998) evaluation for this station indicates that the River Dodder has a Q value of 'Q4 - Good Status'⁸.

The nearest Natura 2000 sites to the proposed development site are the Glenasmole Valley Special Area of Conservation (SAC) located approximately 4 kilometres to the south, Wicklow Mountains SAC located approximately 6.5 kilometres to the south, and Wicklow Mountains Special Protection Area (SPA) located approximately 7.5 kilometres to the southwest. A full list of the Natura 2000 sites located within 15 kilometres of the proposed development site can be found in **Section 5.2.3.5**, below.

⁶ EPA Maps [Accessed: 26th April 2022]

⁷ River kilometres - measure of the distance in kilometres along the path of a river

⁸ EPA Maps [Accessed: 25th April 2022]



4. Project Characteristics

4.1 Background and Purpose of the Project

The proposed housing development will be located on a site that is currently being used for industrial and commercial purposes within the Broomhill Industrial Estate in Tallaght. The overall development scheme will involve construction of a new residential and mixed-use scheme of 242 no. apartment units with commercial space and amenities. The main purpose of the development is to contribute to the regeneration of the Broomhill Industrial Estate as set out in the Draft South Dublin County Development Plan 2022 - 2028⁹. Additionally, the development will assist in addressing the current national housing crisis.

4.2 Brief Project Description

The proposed development site has a total red line area of approximately 1.4 hectares and is bounded to the north by Broomhill Terrace, to the west by Broomhill Road, and to the south and east by industrial units (see **Figure 2**, below). The project will result in the construction of 242 no. apartment units comprising a mix of 96 no. 1-bed apartments, 141 no. 2-bed apartments, and 5 no. 3-bed apartments distributed over 5 apartment blocks ranging in height from 4 to 7 storeys as follows (refer to Ground Floor Site Plan in **Appendix 2**):

- Block A (5 storeys): 40 no. apartments (4 no. 1 bed, 31 no. 2 bed & 5 no. 3 bed units) (4,105 metres²)
- Block B and C (7 storeys): 102 no. apartments (45 no. 1 bed & 57 no. 2 bed units) (9,212.9 metres²)
- Block D (5 7 storeys): 36 no. apartments (16 no. 1 bed & 20 no. 2 bed units) (3,778 metres²)
- Block E (4 5 storeys): 64 no. apartments (31 no. 1 bed & 33 no. 2 bed units) (5,404 metres²)

Each apartment will have a private open space of either a balcony or terrace. The proposed development will also provide a total of 136 no. car parking spaces at ground floor level (including 7 no. Accessible spaces at surface level) and 426 no. bicycle spaces (resident bicycle parking and visitor bicycle parking). A crèche of approximately 465 metres² will be constructed at ground level within Block D, while a café measuring approximately 50.9 metres² will be installed at the ground floor of Block C. Residential amenity areas will be provided within the ground floors of Blocks B and C and will include the following (with approximate area measurements):

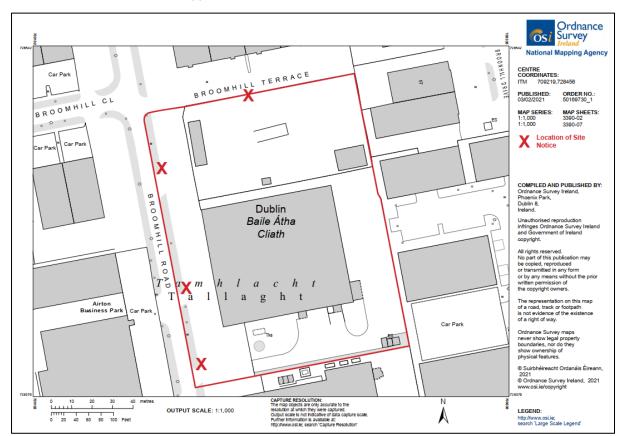
- Reception (125.1 metres²)
- Resident lounge (45 metres²)
- Letting office (11.8 metres²)
- Rentable room/studio space (39 metres²)
- Public gym (128.5 metres²)
- Public co-working space (128.4 metres²)

The Landscape Design Plan (see drawing in **Appendix 3**) proposes to provide a communal open space measuring 1,797.4 metres² in the form of 2 no. roof top terraces at Blocks D and E, courtyard space at ground level, outdoor seating with areas of hard landscape, lawns and tree planting using a mix of native and ornamental tree and shrub species. Also proposed is the provision of 1,400 metres² of landscaped public open spaces that include outdoor

⁹ Stage 3-Material Amendments - SDCC [Accessed: 28th April 2022]



seating, paved areas, a lawn area, play areas and further outdoor seating to the front of the proposed café at Block C.



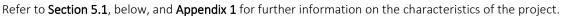


Figure 2: Ordnance Survey Ireland map of the proposed development site and the site's red line boundary

Prior to construction, the site will be enclosed with hoarding/fencing and all existing structures and hard surfaces will be demolished – total area to be demolished is approximately 4,319.9 metres². Minimal removal of topsoil and vegetation will take place before the site compound and associated welfare facilities and storage areas are set up. Bulk excavations of approximately 7,300 metres³ of material will then be required to achieve correct formation levels for the apartment blocks, carparking and ancillary buildings.

The sub-structure of the apartment blocks and the roads and services will be constructed first including foundations, internal roads and footpaths, and drainage infrastructure. The superstructure of the proposed project will then be completed including the construction of load-bearing walls, non-load-bearing vertical elements, roof structures and cladding, and mechanical and electrical fitouts. Installation of stud work and equipment, and connection to services will be carried out when cladding is completed and the floor is weather-tight. Finally, finishes to roads, paths, and gardens will be completed. The gross floor area of construction is expected to be 22,499.9 metres².

A Construction Environmental Management Plan (CEMP) has been prepared by AWN Consulting (AWN) on behalf of the applicant. The CEMP encompasses construction programming and phasing, excavations, site logistics, construction traffic and site access, construction lightings, air quality, noise and vibration, resource and waste management and surface water management and will ensure that the proposed development is constructed using best practice and with minimum impact on the surrounding environment.



5. Annex III Criteria Assessment

This section presents an assessment of the proposed housing scheme development against the criteria included in Annex III of the EIA Directive (2014/92/EU). The criteria are grouped under three headings and these are presented below relevant to the proposal. Refer to **Appendix 1** for further information on construction and the characteristics of the project.

5.1 Characteristics of the Proposed Development

5.1.1 The Size of the Proposed Development

The development site has an overall footprint of 1.4 hectares and a gross construction floor area of 22,499.9 metres², all enclosed within an existing urban environment. As discussed in **Section 4**, above, the proposed development consists of 242 no. apartments over five apartment blocks with a café, childcare facility and play areas, car and bicycle parking spaces, and landscaped communal areas and public areas along with all associated site works and ancillary services. The works encompass most of the site but, when finished, will include green and landscaped areas within the development (see drawing of Proposed Landscape Design Plan in **Appendix 3**). Works will be completed within approximately 18 to 24 months, subject to planning being granted. Controls to prevent any potential environmental impacts, e.g. surface water discharges, noise, dust and waste emissions have been taken into account in the design of the whole project

5.1.2 The Cumulation with Other Existing and/or Approved Projects

Broomhill Industrial Estate and the surrounding areas are subject to ongoing commercial, retail and residential development. A recent search of SDCC's on-line planning enquiry system determined that current grants of permission within the Broomhill Industrial Estate and the surrounding areas are predominantly concerned with works such as demolition, remediation and extensions to existing private dwellings and commercial buildings. Refer to **Appendix 4** for granted and/or pending planning applications within the Broomhill Industrial Estate area for the period 2019 to April 2022. In terms of cumulative impacts, should any of these build projects proceed, the vast majority will be small-scale and contained to the dwelling sites or commercial buildings.

In addition, there have been several other SHD Planning Applications made to An Bord Pleanála for the Tallaght area in recent years. **Table 1**, below, lists some of the most recent SHD applications and their current statuses. While these proposals may represent larger developments, they are to be contained within their respective development sites in an already built-up, industrial environment and therefore, no significant effects are anticipated in relation to these proposals.

Consequently, the potential for cumulation of the proposed housing development at Broomhill Road with other projects is not considered to be significant.

Reference Number	Applicant	Location	Project Details	Application Status	Decision Date
TC06S.311896	Ravensbrook Limited	Belgard Square East, Belgard Road & Blessington Road, Tallaght	326 no. Build-to-Rent apartments, crèche and associated site works	Requires further consideration/ amendment - 28/02/22	N/A
SHD3ABP- 309916-21	Square Foot Property Services Ltd.	Glen Abbey Complex, Belgard Road, Cookstown	Demolition of existing buildings; Construction of 'build-to-rent' development of 170 apartment units and crèche within 2 blocks across 4 to 7	Granted	21/09/21

Table 1. Granted and on-going SHD applications within the Tallaght area

MWP

Reference Number	Applicant	Location	Project Details	Application Status	Decision Date
		Industrial Estate, Dublin 24	storeys over basement carpark; internal communal amenity spaces, external communal open spaces, car/bicycle parking spaces, and all associated plant		
SHD3ABP- 308398-20	Steelworks Property Developments Ltd.	Units 66 & 67, Fourth Avenue, Cookstown Industrial Estate, Tallaght	Demolition of existing industrial buildings; construction of 252 'build-to-rent' apartments in a two to nine storey development, internal communal amenity space, external communal amenity space, car/bicycle parking; construction of two commercial units and crèche with play area; road, junction and streetscape upgrade works; construction of temporary access road; all associated works	Granted	28/01/21
SHD3ABP- 306705-20	Greenleaf Homes Ltd.	Former Gallaher's Cigarette Factory site, at junction of Airton Road and Greenhills Road, Tallaght	Demolish existing buildings; construction of 502 apartments within 6 blocks ranging from 4 to 8 storeys; provision of residential amenity facilities, 3 retail units, crèche, and bins area; car/bicycle parking; provision of road improvements and pedestrian crossings; all associated works	Granted	16/06/20
SHD3ABP- 305763-19	Power Scaffolding Supplies Ltd.	Site at the corner of Airton Road and Belgard Road, Tallaght	Demolition of existing industrial buildings, construction of 328 apartments over two blocks, ancillary residential support facilities and commercial floorspace including office space, café, crèche, gym, reception, communal resident's lounge; landscaped courtyard, public plaza, pedestrian access, balconies, car/bicycle parking, bin storage, and all associated works	Granted	20/02/20
SHD3ABP- 303803-19	Pyrmont Property Developments Ltd.	Unit 5A-C, Second Avenue, Cookstown Industrial Estate, Tallaght	Demolition of existing buildings; Construction of 'build-to-rent' development of 196 apartment units in four blocks of 6 to 9 storeys; commercial unit, office unit, crèche, gym, communal amenity spaces and facilities; landscaped courtyard, bicycle/car parking, waste stores; all associated works	Granted	25/07/19
SHD3ABP- 303306-18	Atlas GP Ltd.	Junction of Belgard Road and Belgard Square North, Tallaght	Development of 438 apartment units and tenant/resident service amenities within four blocks; development of 403 bedspace student accommodation scheme in one block, student amenities and staff facilities; crèche, play area, retail/commercial units, security room, car/bicycle parking, public plaza, and landscaping	Granted	15/04/19

Due to the urban nature of the proposed development site and its environs, a review of EPA licensed operators confirmed that there are several Industrial Emissions Directive (IED) licensed facilities within the surrounding area. **Table 2**, below, lists those located within 2 kilometres of the proposed residential development. None are positioned sufficiently near the proposed development to create potential for cumulative environmental impacts.

Table 2. Industrial Emissions Directive (IED) licenced facilities located within 2 km of the proposed development site at Broomhill Road

Licence Type	Name	Location	Active licence number	Approximate distance and direction from proposed development site
s	Safety Kleen Ireland Ltd.	Unit 5, Airton Road, Tallaght	W0099-01	0.18km south of proposed development
The Adelaide & Meath Hospital, Dublin		Tallaght, Dublin 24	P0160-01	1.2km west of proposed development
industrial Emissions	Henkel Ireland Operations and Research Ireland Limited (Tallaght)	Tallaght Business Park, Whitestown, Tallaght	P0079-03	1.70km southwest of proposed development
느	Starrus Eco Holdings Limited (Ballymount)	Ballymount Cross, Tallaght	W0039-02	1.90km north of proposed development



Licence Type	Name	Location	Active licence number	Approximate distance and direction from proposed development site
	Ballymount Baling Station	Ballymount Road, Walkinstown, Dublin 12	W0003-03	2km northwest of proposed development
u	Bimeda Animal Health Limited	Airton Close, Tallaght	P0357-01	0.290km southwest of proposed development
Integrated Pollution Control	Microprint	Airton Industrial Estate, Airton Road, Tallaght	P0659-02	0.335km southwest of proposed development
	Print & Display Limited	80 Cookstown Industrial Estate, Tallaght	P0116-01	0.774km west of proposed development
Inte	INX International Ink Company Limited	50 Cookstown Industrial Estate, Tallaght	P0252-01	0.903km southwest of proposed development

Similarly, there are five EPA licensed waste facilities within 2 kilometres of the proposed development site, as summarised in **Table 3**, below. None are positioned sufficiently near the proposed development to create potential for cumulative environmental impacts.

Table 3. Summary of EPA licensed waste facilities located within 2km of the proposed residential development at Broomhill Road

Name	Location	Active licence number	Approximate distance and direction from proposed development site
Starrus Eco Holdings Limited (Cookstown, Tallaght)	Unit 41 Cookstown Industrial Estate, Tallaght	W0079-01	0.907km west of proposed development
Tonge Industries Limited	Unit 7, First Avenue, Cookstown Industrial Estate, Tallaght	W0239-01	1km west of proposed development
Harp Refrigerants Limited	Unit 2, Whitestown Industrial Estate, Whitestown Road, Tallaght	W0297-01	1.84km southwest of proposed development
Key Waste Management Limited	Greenview, Greenhills Road, Walkinstown, Dublin 12	W0045-01	2.3km northeast of proposed development
Sorundon Ltd t/a Irish Environmental Services	520 Beech Road, Western Industrial Estate, Naas Road, Dublin 12	W0040-01	2.82km north of proposed development

It is proposed that wastewater from the proposed development will discharge to Ringsend Wastewater Treatment Plant (WWTP) (Licence No. D0034) via the existing public foul system. Ringsend WWTP was designed for a capacity of 1,640,000 PE¹⁰ but currently receives approximately 2,000,000 million PE load. As a result, the plant is non-compliant with the emission limit values (ELVs) set in the Urban Wastewater Treatment Directive and does not have the capacity to effectively treat wastewaters to the necessary standards. Therefore, it is possible that wastewater from the proposed development may cumulatively put pressure on the WWTP and surrounding environment.

However, phased upgrades to the plant by Irish Water are ongoing and the current phase of a 400,000 PE capacity upgrade had an expected completion date of 2021 but was delayed due to the Covid-19 pandemic restrictions in 2020 and 2021¹¹. Based on planned upgrade works, it is now anticipated that the plant will be discharging treated effluent in compliance with parameters set out in the discharge licence by late 2023 (based on a load of 2.1 million PE), with the overall plant upgrade works expected to be completed in 2025. Once complete, the plant will have an increased capacity of 2.4 million PE¹². Therefore, should planning be granted, the proposed development in Tallaght is unlikely to be constructed and fully operational before the Ringsend upgrades are completed, thereby removing the potential for significant cumulative impacts to water quality.

¹⁰ Defined using population equivalent value (p.e.)

¹¹ EPA site visit report, Dec 2020 090151b2807a0a61.pdf (epa.ie) [Accessed: 27th April 2022]

¹² 090151b2807d3b9b.pdf (epa.ie) [Accessed: 27th April 2022]



There are seven urban wastewater treatment (UWWT) plants located within the Liffey and Dublin Bay Catchment. Details of these plants and their approximate distance and location from the proposed works site are summarised in the following **Table 4**:

Facility Name	Facility Type	Active Licence Number	Approximate distance and location from proposed development site	Latest plant compliance status
Lower Liffey Valley Regional Sewerage Scheme	>10,000 PE	D0004-02	10.7 km northwest of proposed development	Pass
Ringsend	>10,000 PE	D0034-01	12 km northeast of proposed development	Fail
Blessington	2,001 to 10,000 PE	D0063-01	19.4 km southwest of proposed development	Fail
Malahide	>10,000 PE	D0021-01	22.3 km northeast of proposed development	Fail
Upper Liffey Valley Sewerage Scheme	>10,000 PE	D0002-01	23.7 km southwest of proposed development	Pass
Ballymore Eustace	1,001 to 2,000 PE	D0238-01	25 km southwest of proposed development	Pass
Kilmeague	1,001 to 2,000 PE	D0233-01	32.3 km west of proposed development	Pass

Table 4. Summary of u	urban wastewater treatment	plants within the Liffey	and Dublin Bay Catchment
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The proposal was considered in combination with plans in the area that could result in cumulative impacts on the environment including:

- Draft South Dublin County Development Plan 2022 2028
- South Dublin County Council County Development Plan 2016 2022
- South Dublin County Council Climate Change Action Plan 2019 2024¹³
- Tallaght Town Centre Local Area Plan 2020 2026¹⁴

The site is zoned as 'REGEN' with an objective of facilitating 'enterprise and/or residential-led regeneration' according to the SDCC County Development Plan (CDP) 2016 – 2022. Future development of the area is being managed in line with the CDP and the Local Area Plan (LAP). Each plan has a range of environmental and natural heritage policy safeguards in place.

The proposed works will generate increased levels of noise and dust during construction, and increased levels of residents in the area once operational. However, considering the urban nature of the existing site and its location within an area already dominated by industry, residential and commercial activities, the additional impact of the proposed development is not deemed to have the potential to be of significance and the cumulative impact is therefore considered negligible.

5.1.3 The Use of Natural Resources, in Particular Land, Soil, Water and Biodiversity

The proposed works will be confined to an urban environment which has already been significantly modified by human activity. Soil cover and vegetation are almost completely absent, and habitat at the site is categorised as 'Buildings and Artificial Surfaces (BL3)'¹⁵.

¹³ 2019-sdcc-climate-change-action-plan-final.pdf [Accessed: 27th April 2022]

¹⁴ tallaght-town-centre-local-area-plan-2020.pdf (sdcc.ie) [Accessed: 27th April 2022]

¹⁵ Fossitt, J. A. (2000). A Guide to Habitats in Ireland. The Heritage Council of Ireland, Kilkenny



The proposed works will involve minimal removal of topsoil and vegetation prior to the demolition of existing structures and hard surfaces. These demolition works will involve breaking out and crushing concrete to allow for use as backfill to structures during construction where possible. Excavations of the site to foundation level, construction of foundations using reinforced concrete and subsequent backfilling will all be required. Construction materials such as gravel, crushed stone, concrete, geotextile and other geosynthetic confinement materials will be sourced off-site, and any surplus materials returned to suppliers. It is anticipated that most of the material excavated will be the existing concrete/tarmacadam surfacing and possibly some remaining light industrial units and containers, and it is unlikely that any in-situ rock breaking will be required. Volumes and quantities of required materials and construction plant/machinery are listed in **Appendix 1**.

Excavated topsoil will be retained and reused as part of the proposed Landscape Design Plan (see drawing in **Appendix 3**). There will be no requirement for water abstraction for the proposed residential development as water requirements during both construction and operational phases will be provided via a new 150ø watermain connection to the existing Local Authority watermain on Broomhill Road to the west of the site.

Overall, it can be concluded that there is no evidence to suggest the project will be detrimental to natural resources. The natural resources required including land, soil and geo-resources, are typical for a project of this scale. Desktop studies do not indicate loss of any protected plant or animal species, and a Screening for Appropriate Assessment has also been carried out.

5.1.4 The Production of Waste

Approximately 7,300 metres³ of excavated material (asphalt/tarmac, stone paving, fill, soil) are expected to be generated by the proposed works. As described in **Section 5.1.3**, above, where possible, excavated material will be crushed and reused as backfill during construction. Waste management and control measures for all ancillary waste will be implemented during construction using the CEMP, before implementation of the Operational Waste Management Plan (OWMP) once the development is completed and operational. During all phases of the proposed development, waste will be segregated and placed in skips/containers in designated waste storage areas for subsequent collection and transfer to an appropriately licensed or permitted waste facility. The appointed Contractor(s) will seek to ensure that materials are re-used or recycled where possible, with disposal being the least favoured option. A compound including car-parking facilities will be established on site, finished with a clause 804 finish, and will contain waste storage areas and receptacles. Potential wastes include construction waste, services waste, and fuel/oil waste. Small quantities of incidental waste materials such as pallets and packaging will also be generated. No significant volumes of hazardous waste material will be generated.

Surface water run-off generated during construction will be routed through a series of on-site Sustainable Urban Drainage System (SuDS) elements which will utilise runoff interception, detention and infiltration at source before discharging to an on-site attenuation system before being finally pumped off-site to the existing Local Authority drain on Broomhill Road. The proposed foul sewer will be fully separated from the proposed storm water drainage and will be designed for sewage and wastewater collection from the proposed buildings. The development will connect to Ringsend Urban Wastewater Treatment Plant (UWWTP) via the existing public foul sewer system. The water supply to the proposed development will be provided through a new 150ø watermain connection to the existing Local Authority located in Broomhill Road to the west of the site.

As outlined, in **Section 4.2**, above, the CEMP includes management and control measures for waste and surface water run-off to be implemented during the construction phase to ensure that the proposed development is constructed using best practice and with minimum impact on the surrounding environment. A pre-connection enquiry application made to Irish Water elicited a response stating that the connection is feasible subject to condition of introducing sewage flow management. The proposed pumping station will store and control the



discharge from the proposed development to the Local Authority gravity network to ensure that the development will not have detrimental effect on the capacity of the downstream network. The flow control and storage measures will be installed, owned and operated by the Developer until the public network upgrade is delivered and additional capacity in the network becomes available.

It is considered that the production of any waste associated with the construction of the development, as described above, would not cause unusual, significant or adverse effects of a type that would require an Environmental Impact Assessment (EIA).

5.1.5 Pollution and Nuisances

Located within Broomhill Industrial Estate, the proposed development site is currently comprised of extensive commercial warehouses and functional buildings of varying degrees of degradation and/or vacancy set within extensive areas of storage and parking provision surrounded by offices, light industrial buildings, and warehouses. Broomhill Business Complex is situated approximately 135 metres to the northwest while Airton Road lies approximately 100 metres to the south. There are existing residential developments at Mayberry Park, approximately 275 metres northwest of the proposed development site and at Bancroft Park, approximately 590 metres to the southeast.

It is estimated that the duration of the build will be 18 to 24 months. The works may give rise to some temporary nuisance due to the noise and dust of construction activities, on-site personnel, and increased traffic to and from the site. However, best practice construction techniques for noise and dust suppression will be employed to minimise adverse impact to neighboring areas. With regards to traffic, a Transportation Assessment Report has concluded that the construction and operation of the proposed development will have a negligible impact on the operation of the adjacent road network and that no adverse traffic/transportation capacity or safety issues are anticipated during construction or operation of the development. Furthermore, as outlined, in **Section 4.2**, above, the proposed CEMP will include for the employment of good construction management practices and standard environmental management during the construction works which will serve to further minimise the risk of pollution and nuisances ensuring minimum impact on the surrounding environment and in compliance with planning conditions.

5.1.6 The Risk of Major Accidents and/or Disasters

Given the temporary nature of the construction stage and the scale of the project, the risk of disasters (typically considered to be natural catastrophes such as very severe weather events) or major accidents (for example fuel spills, traffic accidents) is considered low. In the case of the occurrence of a severe weather event such as flooding during construction, work will be curtailed.

5.1.7 The Risks to Human Health

There will be temporary nuisances associated with the proposed project. The scheme will be connected to the public sewer and the resulting wastewater will be directed to a local UWWT plant. The proposal will include temporary noise from machinery on site and will be enclosed within an existing urban area which will not involve significant risks to human health.



5.2 Location of Projects

5.2.1 The Existing and Approved Land-Use

The works will be carried out in an urban, industrialised area of low-sensitivity with features and/or vegetation of quality or value either scarce or completely absent from the site. The scheme will occupy approximately 1.4 hectares of land. There will be a change in land-use from commercial and industrial purposes to a taller mixed-use scheme and residential complex. The site is currently zoned as 'REGEN' with an objective of facilitating 'enterprise and/or residential-led regeneration' under the SDCC County Development Plan (CDP) 2016 – 2022.

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

The proposed development will be located within the busy Dublin suburb of Tallaght. Construction and operation of the scheme will be confined to the proposed site within the Broomhill Industrial Estate and to the relevant streets and junctions. No part of the proposed residential development will traverse a designated conservation area. A Stage 1 Screening for Appropriate Assessment was carried out and concluded that there will be no impact on any Natura 2000 sites within 15 kilometres of the proposed development site.

The project does not involve use or destruction of natural resources, such that there would be a significant threat to their regenerative capacity.

5.2.3 The Absorption Capacity of the Natural Environment

5.2.3.1 Wetlands, riparian areas, river mouths

The Tymon River lies approximately 400 metres southeast of the proposed development site and flows northnortheast for approximately 2.1 river kilometres before forming the River Poddle. The Jobstown Stream is situated approximately 920 metres south of the proposed development site, flowing east alongside the Tallaght Bypass for 1.4 river kilometres before merging with the River Dodder. All these watercourses are separated from the proposed development site by intervening areas of built ground, comprising mixed-use residential and commercial development and urban infrastructure.

As described in **Section 5.1**, above, standard best practices will be employed for the duration of the works ensuring the watercourses within the vicinity of the development will not be affected. The development area itself is contained within the urban fabric of Tallaght and does not constitute a wetlands or riparian area.

5.2.3.2 Coastal Zones and the Marine Environment

The site lies inland west of Dublin Bay.

5.2.3.3 Mountain and Forest Areas

The site is located within the Dublin City suburb of Tallaght. There are forestry and mountains in the greater region to the south but none will not be affected by the project.

5.2.3.4 Nature Reserves and Parks

There are no nature reserves or parks in the area that will be affected by the project.

5.2.3.5 Areas classified or protected under legislation; Natura 2000 areas designated by Member States pursuant to Directive 92/43/EEC and Directive 2009/147/EC

The proposed development lies within 15 kilometres of nine Natura 2000 sites. A Screening for Appropriate Assessment has been prepared and it has been objectively concluded that the proposal is not likely to have a significant effect on the conservation objectives of any of these nine Natura 2000 sites and they can, therefore, be screened out for appropriate assessment. The nine sites are:

- Glenasmole Valley SAC (001209)
- Wicklow Mountains SAC (002122)
- Rye Water Valley/Carton SAC (001398)
- South Dublin Bay SAC (000210)
- Knocksink Wood SAC (000725)
- North Dublin Bay SAC (000206)
- Wicklow Mountains SPA (004040)
- South Dublin Bay and River Tolka Estuary SPA (004024)
- North Bull Island SPA (004006)

5.2.3.6 Areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure

According to an EPA report published in August 2021¹⁶, Dublin (Ringsend) is listed as a priority urban area where inadequate treatment of urban wastewater, and the subsequent failure to meet EU treatment standards, puts significant pressure on waters already at risk of pollution. Even though Ringsend is Ireland's largest UWWT plant and treats 44% of Ireland's wastewater, it has repeatedly failed the treatment standards because it does not have the capacity to effectively treat the volume of sewage it receives¹⁷. Irish Water is in the process of upgrading the plant and advises that it will be completed by 2025 (see **Section 5.1.2**, above)¹⁸.

5.2.3.7 Densely Populated Areas

Tallaght is the largest suburb of Dublin City and the largest town in south County Dublin. The proposed development site is located within the Electoral Division (ED) of Tallaght-Kingswood (CSO Area Code: ED 03036), and Central Statistics Office (CSO) data indicates that in 2016 this ED had a total population of 3,996 persons resident. This is a relatively low population density for inner-city living due mainly to the dominance of commercial estates and industrialised landscapes within the ED. Therefore, the operational phase of the proposed development, and to some extent the construction phase, will significantly increase the local population as the development site and its environs are currently used principally for commercial and industrial purposes.

Additionally, as explained in **Section 5.1.2**, above, the construction and operation of the proposed development will not significantly affect the ability of Ringsend WWTP to treat the increased volume of wastewaters efficiently and effectively. As discussed in **Section 5.1.4**, above, Irish Water have stated that water and wastewater connection for the development is feasible provided there is management of sewage flow by the Developer until the upgrade of the public network, currently in the preliminary design stage, is completed. Similarly, as noted in

¹⁶ <u>Compliance & Enforcement: Wastewater | Environmental Protection Agency (epa.ie)</u> [Accessed: 27th April 2022]

¹⁷ Monitoring & Assessment: Wastewater | Environmental Protection Agency (epa.ie) [Accessed: 27th April 2022]

¹⁸ 090151b2807d3b9b.pdf (epa.ie) [Accessed: 27th April 2022]

Section 5.1.5, above, a Transportation Assessment Report has concluded that the proposed development will have a negligible impact on the operational capacity of the local road network and no significant safety issues are anticipated as a result of the increase in local population density.

Therefore, an increase in the density of the local population will not have a significant effect on the absorption capacity of the natural environment at the proposed development site.

5.2.3.8 Landscapes and Sites of Historical, Cultural or Archaeological Significance

Examination of the National Inventory of Architectural Heritage (NIAH) and the National Monuments Service (NMS) online databases indicates that there are no recorded monuments, buildings or historic sites listed within the proposed development site nor are there any located within 500 metres of it. There are several recorded cultural heritage features in the areas surrounding the proposed development site. The nearest is the 19th century St Maelruain's Church of Ireland chapel (Reg No. 11215004) built in 1829 and located approximately 300 metres south of the proposed development. There is the site of a medieval period ecclesiastical enclosure (DU022-005005-) in Kilnamanagh approximately 900 metres northeast in an area that also includes a graveyard (DU022-005003-) and a holy well (DU022-005004-). Similarly, approximately 850 metres south of the proposed development is the site of a 12th century historic town (DU021-037002-) with graveyard (DU021-037004-), and a nearby site of a 12th century historic town (DU021-037----).¹⁹ None of these historical sites will be significantly affected by the proposed development due to the intervening distance consisting of vegetation and built-up landscape.

Overall, the proposed project aims to improve the aesthetics of the Broomhill Industrial Estate and the wider Tallaght area while also benefiting the cultural features, buildings and protected structures of the area. The excavations required for the construction phase of the proposed development will be on previously excavated lands within the urban fabric of Tallaght, thereby making the potential for unknown archaeology within the site very unlikely. However, if required, the works can be supervised by an Archaeologist.

5.3 Types and Characteristics of Potential Impacts

5.3.1 Population and Human Health

The likely significant effects of the project on population and human health have been considered in the following table:

Characteristics of the Impact	Population and Human Health
Magnitude and spatial extent	Limited to the site and locality
Nature	Potential nuisance impacts such as noise and dust arising from construction activities, workers and traffic during construction phase. Best construction practice in relation to noise and dust suppression will apply. Increased air emissions during construction phase not likely to have appreciable impacts on human health.
Transboundary nature	Not applicable
Intensity and complexity	Construction will take place over a period of approximately 18 to 24 months with the most disruption taking place in the first number of months due to activities such as demolitions, excavations, concrete deliveries. Impacts are not complex.

¹⁹ <u>Historic Environment Viewer (archaeology.ie)</u> [Accessed: 27th April 2022]



Characteristics of the Impact	Population and Human Health
Probability	Significant impacts unlikely to occur.
Expected onset, duration, frequency and reversibility	Construction and operation phase – Site preparation and site use. Positive effects thereafter in the operational use of the development.
Cumulation with other existing and/or approved projects	Cumulation with existing traffic on the adjacent road network.
Possibility of effectively reducing the impact	Best construction practice in relation to minimising traffic and other nuisance effects will be employed.

It is not considered that construction or operation of the proposed development will result in a significant negative effect on population and human health, either alone, or in combination with other projects. Overall, the provision of a residential development will have a positive impact in terms of the needs of the local population whilst also contributing to the immediate townscape character and setting.

5.3.2 Biodiversity

The likely significant effects of the project on biodiversity have been considered in the following table:

Characteristics of the Impact	Biodiversity
Magnitude and spatial extent	Encompasses the site and locality within the Liffey and Dublin Bay Catchment
Nature	Along the western boundary, there will be some loss of trees and managed grassland not considered to be of unique or high biodiversity value. Once completed, the open spaces at the development will increase tree and shrub cover across the site leading to an ecological enhancement and a likely increase in species diversity at the site. Pollution risk from earthworks in the small, contained urban site is considered low. Pollution risk during the operational stage from wastewater effluent and storm water considered low due to ongoing upgrade works by Irish Water (see Section 5.1.2 , above).
Transboundary nature	Not applicable
Intensity and complexity	Vegetation clearance will be localised to the site extent and intense over a short period (about a week) but not complex as it will be completed outside the bird- breeding season. Contained and controlled site and works, impacts to biodiversity not considered intense or complex during construction or operation phase.
Probability	Significant impacts unlikely to occur.
Expected onset, duration, frequency and reversibility	Habitat loss is permanent and unlikely to reverse. Low pollution risk to watercourses during construction phase and operational phase. Impacts can be reversible.
Cumulation with other existing and/or approved projects	Potential for cumulative water quality impacts during operation of proposed development due to outdated public water network and insufficient capacity in Ringsend WWTP. However, as discussed in Section 5.1.2 , above, Irish Water have confirmed that a wastewater connection is feasible provided there is sewage flow management by the Developer until the network has sufficient capacity. Phased upgrades to Ringsend WWTP are ongoing with the final phase to be completed in 2025 ²⁰ . Therefore, the potential for significant cumulative effects to water quality and to the environment is unlikely.
Possibility of effectively reducing the impact	Proposed landscaping will provide significantly more vegetation cover and green spaces then the existing site. A range of predominantly indigenous plant species will be used to increase species diversity and encourage more pollinators to the site. See Landscape Design Plan drawing in Appendix 3 .

²⁰ EPA site visit report, Dec 2020 090151b2807a0a61.pdf (epa.ie) [Accessed: 27th April 2022]



There will be some loss of vegetation along the western extent of the proposed development site, however the proposed landscape works will be of a superior ecological worth. Therefore, it is not considered that construction or operation of the proposed development will result in any significant adverse effects to the biodiversity of the site, either alone, or in combination with other projects.

5.3.3 Land

The likely significant effects of the project on land have been considered in the following table:

Characteristics of the Impact	Land
Magnitude and spatial extent	Limited to the development site of 1.4 hectares that is currently used for commercial and industrial purposes only.
Nature	There will be a change in land-use from commercial and industrial purposes to a taller mixed-use scheme and residential complex.
Transboundary nature	Not applicable
Intensity and complexity	Intensity considered low as the land-take is relatively modest and is already heavily modified. Impacts are not complex.
Probability	Significant impacts unlikely to occur.
Expected onset, duration, frequency and reversibility	Change in land use is permanent and unlikely to be reversed. This land is zoned for the change of use.
Cumulation with other existing and/or approved projects	Cumulation with other activities and projects associated with Tallaght not considered a significant impact.
Possibility of effectively reducing the impact	Not possible.

The change in land use is relatively modest and therefore, is not considered that construction or operation of the proposed development will result in a significant effect on land, either alone, or in combination with other projects.

5.3.4 Soil

The likely significant effects of the project on the soil environment have been considered in the following table:

Characteristics of the Impact	Soil
Magnitude and spatial extent	Local and insignificant
Nature	Any topsoil removal will be minimal and considered insignificant. Existing hard surfaces and structures will be removed from the works site. Localised excavations will be required to form basements and achieve formation levels. The expected volume of bulk excavation is approximately 7,300 m ³ . Geological resources required are typical for this type of development.
Transboundary nature	Not applicable.
Intensity and complexity	Intensity considered low as the works will be carried out in an existing urban area with very limited amounts of soil already present. Impact are not complex.
Probability	Significant impacts unlikely to occur.
Expected onset, duration, frequency and reversibility	The development is on made ground within the urban fabric of Tallaght. Removal of any existing soil will be permanent and unlikely to be reversed.



Characteristics of the Impact	Soil
Cumulation with other existing and/or approved projects	Cumulation with pressures associated with Tallaght not considered significant.
Possibility of effectively reducing the impact	Not possible

It is not considered that construction or operation of the proposed development will result in a significant effect on soil, either alone, or in combination with other projects.

5.3.5 Water

The likely significant effects of the project on the water environment have been considered in the following table:

Characteristics of the Impact	Water
Magnitude and spatial extent	Liffey and Dublin Bay Catchment (Catchment ID: 09)
Nature	Potential for pollution in water run-off from construction site reaching nearby watercourses Tymon River and Jobstown Stream which both drain into the River Liffey and ultimately Dublin Bay. Significant impacts are not envisaged due to the distance of the site from the watercourses and the contained nature of the site and works within the urban fabric of Tallaght. The proposed CEMP will include management and control measures for wastewater and surface water run-off to be implemented during the construction phase to ensure use of best practice resulting in minimal impact on the surrounding environment The current standard of practice (CIRIA) and Contractor control will alleviate any minor impacts at the site. Irish Water have confirmed capacity and specified design requirements for the project's drainage. Pollution risk during operational stage from WWTP effluent and storm water is considered low as ongoing upgrades to Ringsend WWTP by Irish Water will provide sufficient capacity by the time the proposed development is operational, should planning be granted. The last phase of the upgrade is due to be completed in 2025. See Section 5.1.2 , above.
Transboundary nature	Not applicable
Intensity and complexity	Intensity of construction phase impacts considered low. Impacts are not complex.
Probability	Significant impacts unlikely to occur.
Expected onset, duration, frequency and reversibility	Low pollution risk to aquatic environment during construction phase and operational phase. Suitable mitigation measures and standard best practices will be utilized. Impacts to water quality reversible.
Cumulation with other existing and/or approved projects	Potential for cumulation with other water quality pressures such as WWTP's. However, significant cumulative impacts during construction phase not likely. Ongoing upgrades to the Ringsend WWTP will ensure there is sufficient capacity for the proposed scheme. See Section 5.1.2 , above.
Possibility of effectively reducing the impact	Reduction of impact on water environment already considered at design phase.

It is not considered that construction or operation of the proposed development will result in a significant effect on the water environment within the Liffey and Dublin Bay catchment, either alone, or in combination with other projects.

5.3.6 Climate Change

The likely significant effects of the project on the climate have been considered in the following table:

Characteristics of the Impact	Climate Change
Magnitude and spatial extent	Greenhouse Gas (GHG) emissions have global effects.
Nature	Construction phase will give rise to additional air emissions from construction vehicles, plant and machinery. However, this will be short-term and considering the scale of the project, will not be significant. The residential units are designed to minimise GHG emissions by meeting and exceeding latest building regulation requirements for energy efficiency by installation of high value insulation, achieving high levels of air tightness and installation of air-water heat exchange systems (instead of using oil or gas). Houses will have a high energy rating.
Transboundary nature	GHG emissions have global effects, however, given the scale and size of the development and the energy efficient design of the both the apartments and commercial units, any GHG emissions will be very low.
Intensity and complexity	Intensity and complexity considered low.
Probability	Significant impacts unlikely to occur.
Expected onset, duration, frequency and reversibility	Increased air emissions during construction phase will be short-term, while emissions from the development once operational will be permanent.
Cumulation with other existing and/or approved projects	Cumulation with other emission sources, such as industry, unlikely to be significant.
Possibility of effectively reducing the impact	Minor effects can be alleviated though standard good site practice for onsite machinery. The residential units and commercial units are all designed to achieve a high energy rating (minimum of A3 Building Energy Rating).

It is not considered that construction or operation of the proposed development will result in a significant effect on the climate, either alone, or in combination with other projects.

5.3.7 Material Assets

The likely significant effects of the project on material assets (e.g. utilities and services such as electricity and water supply, capacity of road to absorb traffic) have been considered in the following table:

Characteristics of the Impact	Material Assets
Magnitude and spatial extent	Regional in extent
Nature	Additional traffic on national road during construction and during operational phase of the project. Additional pressure on utilities and services such as electricity supply, water resource, however there is sufficient resources available.
Transboundary nature	Not applicable
Intensity and complexity	Intensity considered low. Impacts are not complex.
Probability	Significant impacts unlikely to occur.
Expected onset, duration, frequency and reversibility	Additional traffic on local roads during construction will be temporary, and during operation will be permanent. Permanent use of water and electricity supply.
Cumulation with other existing and/or approved projects	Cumulation with other users of water and electricity, and geological resources, however, use of these material assets for the project not considered significant
Possibility of effectively reducing the impact	To enhance the sustainability attributes of the project and reduce demand on Irish Water supply and foul treatment requirements, water conservation measures will be incorporated. These will include all dual flush toilets and monobloc low volume



Characteristics of the Impact	Material Assets
	push taps. To reduce the demand for energy, all residential and commercial units are designed to achieve a high energy rating. The completed development will constitute a new material asset for the area.

It is not considered that construction or operation of the proposed development will result in a significant effect on material assets in the region, either alone, or in combination with other projects.

5.3.8 Cultural Heritage

The likely significant effects of the project on cultural heritage (e.g. national monuments, protected structures, proposed architectural conservation area) have been considered in the following table:

Characteristics of the Impact	Cultural Heritage
Magnitude and spatial extent	Local
Nature	There are no protected archaeological or architectural structures on or close to the site that could be impacted by the proposed development. The potential for unrecorded subsurface archaeology at the proposed development site is considered low as the site is located within the highly modified urban fabric of Tallaght and has been subject to numerous excavations and disturbances in the past.
Transboundary nature	Not applicable.
Intensity and complexity	Intensity considered low. Impacts are not complex.
Probability	Significant impacts unlikely to occur.
Expected onset, duration, frequency and reversibility	Impacts will be limited to the construction phase during earthworks.
Cumulation with other existing and/or approved projects	None envisaged.
Possibility of effectively reducing the impact	Monitoring if practical or under direction of the County Archaeologist.

It is not considered that construction or operation of the proposed development will result in a significant effect on cultural heritage in the region, either alone, or in combination with other projects.

5.3.9 Landscape

The likely significant effects of the project on the landscape have been considered in the following table:

Characteristics of the Impact	Landscape
Magnitude and spatial extent	Local
Nature	The works site is currently used for commercial/industrial purposes and can generally be regarded as a poor townscape of low sensitivity and value with no visual amenity value. The proposed development will result in significant changes to the baseline setting via the introduction of taller buildings, public spaces and landscaped works. However, these changes will improve the aesthetics and experience within the existing urban area and positively contribute to the immediate townscape character and setting of Tallaght.
Transboundary nature	Not applicable.



Characteristics of the Impact	Landscape		
Intensity and complexity	Intensity considered low. Impacts are not complex.		
Probability	Significant impacts to the landscape will occur but are set to improve the existing landscape.		
Expected onset, duration, frequency and reversibility	The finished works will be permanent and irreversible.		
Cumulation with other existing and/or approved projects	Potential for culmination with any other future developments, though considering the location and existing screening, there will not be a significant cumulative impact.		
Possibility of effectively reducing the impact	A proposed Landscape Management and Maintenance Plan (see Appendix 3) has been developed for the site which incorporates large green areas into the site. The Plan will also ensure the successful visual integration of the proposed development into the surroundings and provide a diversity of landscape experiences for the users, residents and visitors alike.		

The proposed development will result in significant changes to the landscape in the region through the installation and operation of taller buildings, public spaces and landscaped works. However, the changes will be an enhancement to the character of the local townscape and provide a positive visual and landscape effect.

5.3.10 The Interaction Between the Factors Referred to Above

The potential for interactions between one aspect of the environment and another can result in direct or indirect impacts which may be positive or negative. Where relevant, interactions have been identified in this document. The main interactions between the following aspects/factors are:

- Effects on water quality can impact aquatic ecology and biodiversity
- Effects on land use can impact the soil and water environment

In the case of this project, the interactions are considered minor in nature and do not pose a significant threat. Site management and good construction practice will minimise and reduce potential impacts on site.

6. Conclusion

6.1 Conclusion of the EIA Screening

In accordance with Article 120(1B)(b)(i) of the Local Government Planning and Development Regulations 2001, as amended, it is concluded that there is no real likelihood of significant effects on the environment arising from the proposed development and that an Environmental Impact Assessment (EIA) is not required in this instance.

6.2 Reasons for Conclusion

It is concluded that an EIA is not required based on the following reasons:

- Having considered the proposed development in the context of the mandatory requirement for Annex I and II projects, there is no requirement for an EIA since the project is below the mandatory threshold for EIA.
- Having regard to the characteristics of the development, the proposal is of a modest scale, involving
 demolition, construction and operational works which are not complex in nature within an urban



development site that will be contained and controlled. Therefore, the development is not of a scale that would introduce significant or complex environmental effects.

- Having regard to the location of the proposed development, within the urban fabric of Tallaght and far-removed from any sensitive or protected Natura 2000 site, it will not introduce significant or complex environmental effects.
- Having regard to the potential for effects on the environment, it is considered that due to the relatively modest scale of the proposed development and the development site location, the potential for minor effects can be alleviated through standard good site practice. Mitigation measures are available, should they be required, including any archaeological monitoring which may be advised by the County Archaeologist.
- Having considered the proposal in cumulation with existing and approved projects and activities, significant effects on the environment are not likely.
- Therefore, it is concluded that there is no real likelihood of significant effects on the environment arising from the proposed development.

6.3 Measures Available to Reduce Effects

Overall this EIA Screening has considered that any impacts or effects are minor in nature and do not pose a significant threat. Site management and good practice will minimise and reduce potential impacts on site.



Appendix 1

Project Description



	The total development site has an overall footprint of 1.4 hectares with a gross floor area of construction of 22,499.9 metres ² .
	Within this, the footprint of each of the 5 no. apartment blocks are as follows:
	 Block A (5 storeys) comprising 40 no. apartments (4,105 sqm)
	 Block B and C (7 storeys) comprising 102 no. apartments (9,212.9 sqm)
Size, scale, area, land-take	 Block D (5 - 7 storeys) comprising 36 no. apartments (3,778 sqm)
	 Block E (4 - 5 storeys) comprising 64 no. apartments (5,404 sqm)
	The proposal will also provide for a childcare facility/crèche and residential amenity areas that include communal open spaces, outdoor seating and planting. A public open space measuring 1,400 metres ² of paved areas, play areas and outdoor seating is also proposed.
	Site set-up and clearance
	Site set up, welfare facilities and compound establishment, decommissioning and movement of site compound and facilities as needed. Set up of hoarding around compound and the site boundary. Erection of safety signage to all areas and implementation of traffic/pedestrian management plan. Site clearance to remove minimal vegetation and topsoil will take place prior to works commencing. All of the existing structures on site will be demolished as part of initial enabling works and hardstanding material excavated before the construction of the proposed development. Total area of demolition approx. 4,319.9 metres ² .
	Construction phase
Details of physical changes	The project excavations will involve excavations for new foundations, site levelling and excavations for roads and services.
that will take place during the various stages of implementing the proposal	Construction of building structure on ground foundations. General site works including construction of drainage infrastructure, internal roads and footpaths (construction methodology and programme will be dictated by the Contractor). Ancillary site development works, landscaping and services.
	Construction Sequence (indicative)
	 Construction of the foundations for the development will involve the excavation of the site to foundation level, construction of the reinforced concrete foundations and subsequent backfilling to proposed floor level. Construction of load bearing walls, non-load bearing vertical elements
	and roof structures.
	 Installation of cladding to roof level and roof cladding. First fix Mechanical & Electrical Fit-Out will commence from ground floor level upwards.
	• This will be followed by the second fix and final connections.



	 Initial installation of stud work when cladding completed, and floor is weather tight. Installation of equipment and associated connection to services. Completion of finishes. The final commissioning period will commence during fit-out. Operational phase On-going routine landscaping and general maintenance works.
Description of resource requirements for the construction/operation and decommissioning of the proposal (water resources, construction material, human presence etc)	Construction-related Materials (indicative) Hoarding, scaffolding Structural/Secondary support steelwork Flooring Non-structural metalwork External wall finishes Roof finishes Above ground drainage pipes, fitting and pipework ancillaries Foul and surface water drainage Watermain pipework Concrete (in-situ, reinforcement, sundries, formwork, precast/composite) Brickwork/blockwork Roofing, cladding and waterproofing Woodwork Road and pavements (sub-bases, bases and surfacing) Kerbs, channels and edgings Signage Manholes and gullies Attenuation tank Full retention and bypass interceptors, silt traps, grease trap Water storage units for fire fighting Electrical pipework Fiil (crushed stone Clause 804, pea gravel) Plaster, render, cement mortar etc. Wall cladding Tilling Construction plant and machinery required (indicative): Hydraulic excavators Mobile cranes Specialist hydraulic demolition/crushing machines 20t 360 Excavators 20t Dumper Truck 3t Mini Digger St Dumper truck 3t roller

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	Ready-mix concrete trucks				
	Pump unit for ready mix concrete				
	Vibrating rollers				
	HGV 20 foot trailers				
	HGV 40 foot trailers				
	Telescopic site handlers				
	Road Sweeper				
	Block Grab				
	Teleporter				
	• 20m ³ Skips				
	Articulated Booms 65ft				
	Scissor Lifts				
	 30 kva Generator (until temporary Power is live) 				
	Kerbing Machine				
	Asphalt paver finisher				
	Water Requirement				
	Water supply during construction and operation will be via Public Watermain on Broomhill Road.				
	Human Resource Requirement				
	It is estimated that there will initially be 40 - 60 staff on site on a typical day, however during peak construction periods this is expected to fluctuate up to 100-150 staff and contractors on site per day.				
Description of timescale for the various activities that will take place as a result of	The construction programme is intended to commence in the first quarter of 2023, with a 18-24-month programme and will be completed in 1 phase. However, commencement date for the project will be dependent on timing of grant of planning.				
implementation (including likely start and finish date)	The proposed hours of work on site will be stipulated in the planning conditions attached to the planning grant. Any working hours outside the normal construction working hours will be agreed with the Local Authority.				
	Construction phase				
	General non-hazardous construction and demolition wastes may comprise the following:				
	• Mixed C&D waste (concrete (approx. 3,650 m ³), bricks, tiles, ceramics,				
Description of wastes arising	wood, glass, plastic, steel and other scrap metal				
and other residues (including	 Soil/sub-soil, stones (approx. 3,650 m³) 				
quantities) and their disposal	Paper, cardboard/plasterboard				
	Certain electrical waste				
	Insulation materials				
	Other residual/surplus building materials				
	Temporary W/C utilities waste				
	Green/organic waste				



 Dry mixed recyclables/ mixed non-recyclable 	•	Dry mixed r	ecyclables/	' mixed nor	n-recyclables
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- Estimated quantity of demolition waste 1,296 tonnes
- Estimated quantity of construction waste 1,186.6 tonnes

It is expected that all excavated material will be removed off-site. Estimated 3 metres maximum excavation depth. Expected volume of bulk excavation on site is 7,300 m³ comprising concrete hardstanding and soil and stone.

Potentially hazardous wastes which may arise include contaminated soil, fuels and oils, construction chemicals and other known hazardous substances (paints, glues/adhesives, batteries etc.), invasive plant species and/or vector material and asbestos.

All plant will likely be refuelled on-site e.g. excavators, tractors & quads, while rigid and articulated vehicles (if required) will likely be fuelled off-site as would all site vehicles (jeeps, cars and vans). A Fuel Management Plan will be implemented prior to the commencement of works. As fuels and oils are classed as hazardous materials, any on-site storage of fuel/oil, all storage tanks and all draw-off points will be bunded (or stored in double-skinned tanks) and located in a dedicated, secure area of the site. Emergency procedures and contingency plans, including emergency spill kit with oil boom, will be set up to deal with accidental spillages.

Surface water discharge from the site will be managed and controlled for the duration of the construction works until the permanently attenuated surface water drainage system of the proposed site is complete. A temporary drainage system shall be installed prior to the commencement of the construction works to collect surface water runoff by the site during construction. Any temporary W/C utilities used on site during the construction phase will be maintained by an approved and permitted contractor.

In the event that any potentially contaminated material is encountered, it will be segregated from clean/inert material, tested and classified as either nonhazardous or hazardous and dealt with accordingly.

No Japanese Knotweed (*Fallopia japonica*) or any third schedule invasive species were detected. If any are detected during the construction and demolition phases of the development, then an invasive species management plan will be produced and implemented.

If any Asbestos Containing Material (ACM) or suspected ACMs are identified, they will be required to be removed by a suitably trained and competent person prior to commencement of works. ACMs will only be removed from site by a suitably permitted waste haulier and will be brought to a suitably licenced facility.

Paints, glues, adhesives, WEEE and other known hazardous substances will be stored in appropriate receptacles in designated areas pending collection by an authorised waste contractor.



	A detailed Resource Waste Management Plan (AWN Consulting Ltd.) has been prepared in relation to the development. Please refer to this document for more information.
	Operational phase
	Typical wastes arising will comprise dry mixed recyclables (paper, plastic, etc), organic waste (food/green waste), glass and mixed non-recyclable/general waste as well as other miscellaneous waste elements e.g. garden waste, batteries etc.
	Waste shall be segregated and stored in designated areas and protected as may be appropriate against spillage and leachate run-off. 5 no. dedicated Waste Storage Areas (WSAs) including 4 no. for residents and 1 no. for commercial have been allocated within the development footprint. Waste will be collected by licenced waste contractors and be transported to registered/permitted/licensed facilities only.
	The development will connect to the public foul sewer system via a proposed foul sewer which will be fully separated from proposed storm water drainage. Wastewater will ultimately discharge to Ringsend WWTP. Sufficient capacity has been confirmed with IW subject to sewage flow management measures which will be employed.
	Surface water run-off generated by the development will discharge from site via a proposed attenuation system and flow control device to an existing Local Authority storm drain. Construction industry standard best-practice SuDS elements will be utilised in respect of surface water run-off.
	A detailed Operational Waste Management Plan (AWN Consulting Ltd.) has been prepared for the development. Please refer to this document for more information.
Identification of wastes arising and other residues (including quantities) that may be of particular concern in the context of the Natura 2000 network	 Fuels/oils/lubricants etc Chemical substances/residues Waste concrete/mortar and other cementitious material Effluent from temporary welfare facilities/operational development
Description of any additional services required to implement the project or plan, their location and	A site compound(s) including offices and temporary welfare facilities will be set up by the main contractor. Refer to the CEMP for possible site compound locations within the development site. Materials, fuel etc will be stored in the secure site compound.
means of construction	Construction traffic and site access will be via Broomhill Road. A Construction Traffic Management Plan will be implemented.



Appendix 2

Ground Floor Site Plan



GENERAL NOTES



Appendix 3

Proposed Landscape Plan



Woodland / Shrub	/ Hedgerow	areas	500 m
Lawn and Grass a	reas		100mn
		1.1.2	





Appendix 4

Granted & On-going Planning Applications Within Vicinity of Proposed Development for period 2019 to April 2022



Table of granted and on-going planning applications made to South Dublin County Council within the vicinity of the proposed Broomhill Road development for the period 2019 to 2022.

Reference Number	Date Received	Applicant	Location	Project Details	Application Status
SD22B/0149	12/04/2022	Robert Reilly	19 Birchview Avenue, Dublin 24	Construction of new single storey, pitched roof, home office & games room (44.9 sqm) & all associated site works to rear garden	Decision pending
SD22A/0101	07/04/2022	Old Bawn Gymnastics	Unit 70, Cookstown Estate Road, Cookstown Industrial Estate	Temporary change of use of part of unit 70 from light industrial to indoor gymnastics sports facility and associated site works	Decision pending
SD22B/0130	28/03/2022	Chris McCreevey	2 Birchview Rise, Dublin 24	Construction of single storey ground floor front extension (9.4sqm) including porch; extend living room and all associated site works	Decision pending
SD22A/0020	21/01/2022	FedEx Express (Ireland) Limited	Unit 1, Belgard Industrial Estate, Belgard Road, Tallaght	9 non-illuminated signs to replace existing and 1 new non-illuminated sign.	Granted
SD21A/0294	27/10/2021	Romaine Nolan	1 Birchview Drive, Dublin 24	Demolition of existing single storey garage wing; construction of new house, No.1A adjoining existing house with addition of rear extension and internal layout changes to No.1, & additional front driveway entrance and all associated site works.	Granted
SD21A/0243	02/09/2021	McHugh Components Ltd.	89 Broomhill Road, Tallaght Industrial Estate	Warehouse extension (circa 87m ²) at rear	Granted
SD21A/0131	15/09/2021	Back 2 Basics Fitness Studio Ltd.	Unit 2, Broomhill Business Complex	Change of use from offices/showrooms to health club, and sign on south facade	Granted
SD21A/0078	31/03/2021	Ard Services Ltd.	Circle K Kilnamanagh Service Station, Mayberry Road, Tallaght	Change of use to retail including off- licence use within overall permitted retail unit.	Refused initially, granted after appeal
SD21B/0157	23/03/2021	Karl & Michelle Waine	14 Mayberry Park, Dublin 24	Construction of 2.75m ² porch, and attic conversion to storage area including dormer roof	Partially refused initially, granted in full after appeal
SD21B/0044	04/05/2021	Yvonne & Neil Dalton	35 Birchview Drive, Dublin 24	Construction of new 2-storey extension to side of existing dwelling	Granted
SD21A/0221	05/08/2021	Brian Fanning	Unit 14, Hibernian Industrial Estate, Dublin 24	New vehicular service yard entrance at side	Granted
SD21B/0319	28/05/2021	Keith Grainger	80 Tymonville Road, Dublin 24	Ground floor extension to side and rear	Granted
SD21A/0139	28/05/2021	O'Mahony Holdings Ltd.	St. Basil's Training Centre, Greenhills Road, Tallaght	Demolition of 3 existing units, construction of residential development consisting of 26 new apartments and 14 existing apartments in two blocks ranging from 3 to 6 storeys high, ground floor café, car/bicycle parking spaces, landscaped open spaces, and all associated works	Refused Appeal submitted 17/01/2022 (Ref Number: ABP- 312504-22)
SD21A/0104	04/05/2021	Technological University Dublin Tallaght	TU Dublin, Tallaght & Airton Close, Tallaght	Footbridge from university campus carpark to Airton Close	Granted
SD21A/0174	27/08/2021	Alan Lawlor	Unit 3, Airton Road, Tallaght	Change of use to restaurant with sit-down facility, café and deli with takeaway produce over two floors	Granted

MWP

Reference Number	Date Received	Applicant	Location	Project Details	Application Status
SD20A/0327	10/12/2020	McHugh Components Ltd.	89 Broomhill Road, Tallaght Industrial Estate	Erect 224m ² of photovoltaic panels on roof of existing building	Granted
SD20A/0161	06/07/2020	Virgin Media Ireland	Unit 7, Broomhill Business Park, Tallaght	Erect 850.87m ² of photovoltaic panels on roof of existing building	Granted
SD20A/0008	13/01/2020	Air Force H7V Ltd.	Units 47-48, Broomhill Close, Broomhill Industrial Estate, Tallaght	Retention of 3 first floor offices and mezzanine floor for storage purposes; free-standing detached steel-framed; 7 bay open-fronted shed at rear	Granted
SD20B/0135	22/04/2020	Edmond Kenny	2 Treepark Drive, Kilnamanagh	Construction of first floor extension and single storey rear extension of existing dwelling	Granted
SD20B/0313	28/08/2020	Jimmy Tracey	9 Birchview Court, Kilnamanagh	Construction of single storey extension to rear of existing dwelling, and single storey extension of previously approved garage conversion	Granted
SD20A/0273	28/10/2020	KTPCC Development Company Ltd.	Junction House, Airton Road & Greenhills Road, Tallaght	Change of use to part of ground floor from retail to medical use, and changes to ground floor elevation	Granted
SD20A/0099	17/04/2020	Lorraine Lyons	Serla House, Hibernian Industrial Estate, Greenhills Road, Tallaght	Modification of existing entrance gate, ramp installation; dock leveller & buffer seals to existing vehicular entrance	Granted
SD20A/0113	12/05/2020	Technological University Dublin	1 Airton Close, Tallaght	Two 13 x 3.07m signs to existing totem and one 50 x 2.18m signage to building façade fronting Airton Road	Granted
SD20A/0201	01/12/2020	Technological University Dublin	Technological University Dublin, Old Blessington Road, Tallaght	Construction of 35m by 25m compound enclosed by 3m perimeter fence to serve as a telecommunications field technician apprenticeship training area	Granted
SD20A/0203	10/08/2020	Vodafone Ireland Ltd.	Eir, Belgard Road, Dublin 24	Extension of existing telecommunications lattice tower (new overall height 31.5m) carrying existing and new antennas, dishes and associated equipment, ground equipment and new fencing	Refused initially, granted after appeal
SD20A/0050	11/12/2020	Templemont Developments Ltd.	Colberts Fort, Belgard Road, Tallaght	Construction of three-storey apartment building containing six apartments with external terraces/private spaces, and one end of terrace two-storey house, landscaping, play area, car/bicycle parking, footpaths, and bin stores	Granted but with conditions attached after appeal
SD19A/0085	14/03/2019	Zoetis Ireland Ltd.	Broomhill Industrial Estate, Broomhill Road, Dublin 24	Demolition of single storey modular building extension to the rear of existing facility and provision of 26.68m x 7.43m x 3.51m high single storey modular building	Granted
SD19A/0033	31/01/2019	Atlantico Partnership	9/10 Broomhill Business Park, Broomhill Road, Tallaght	Internal alterations and change of use of existing first floor mezzanine storage area to provide 148m ² of ancillary office space	Granted
SD19A/0346	01/11/2019	Killart Ltd.	Airton House, Airton Road, Tallaght	Change of use and conversion of existing vacant two-storey office building to provide 38 residential accommodation units to be used as a family hub, external playground, car/bicycle parking, landscaping. Retention of minor new and altered window arrangements to the north and west elevations	Granted
SD19B/0374	20/09/2019	John Murphy	2 Birchview Close, Kilnamanagh	Retention of existing bay window and extended porch to front of property	Granted

MWP

Reference Number	Date Received	Applicant	Location	Project Details	Application Status
SD19A/0161	10/05/2019	Lorraine Lyons	Serla House, Hibernian Industrial Estate, Greenhills Road, Tallaght	Subdivision of single light industrial/warehouse unit into three self- contained, light industrial/warehouse units; vehicular entrance on east elevation; associated works	Granted
SD19A/0318	08/10/2019	Father Michael Murphy	St. Kevin's Church, Treepark Road, Kilnamanagh	Replacement of existing prefab office to building with 49.2m ² single storey flat, pastoral centre and wheelchair ramp	Granted
SD19A/0299	24/09/2019	Constant Property Airton Road Ltd.	Unit 5, Airton Close, Airton Road, Tallaght	Partial change of use at ground floor to office and laboratory; construction of new internal first floor level; 7 new windows at first floor; removal of existing roller shutter on east façade and replacement with new door, glazing panel and signage; 3 new windows at ground floor; new door at ground floor; roller shutter door at west façade; construction of new enclosed covered storage area to west façade; new door on west façade	Granted
SD19A/0237	25/07/2019	Gabrielle Branigan	1 Parkhill Close, Kilnamanagh	Construction of three bedroom two-storey detached dwelling to side of existing dwelling; relocation of existing vehicular entrance onto Parkhill Close; creation of new vehicular entrance for new dwelling	Granted
SD19A/0265	30/10/2019	Alan and Natasha Bramble	Lands adjacent to 1 Pinetree Grove, Kilnamanagh	Construction of two-storey dwelling of 3 bedrooms, bathroom, open plan kitchen, dining space & living room with total area of approx. 116m ²	Granted