

# Killinarden Park proposed upgrade works

EIAR Screening Report

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Project number: 2020s0990

Nicholas de Jong Associates

Final

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## Contract

This report describes work commissioned by Nicholas de Jong Associates. Conor O'Neill of JBA Consulting carried out this work.

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## Purpose

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# Contents

1	Introduction .....	1
1.1	Purpose of this Report .....	1
2	Project Description.....	2
2.1	Proposed works .....	2
3	Purpose of Screening .....	3
3.1	Legislative Context for EIAR in Ireland.....	3
3.2	The Planning and Development Act 2000 - Mandatory EIAR .....	3
3.3	Sub-threshold EIAR Guidance for Consent Authorities.....	4
4	Killinarden Park - Overview of Environmental Impacts .....	6
4.1	Population and Human Health .....	6
4.2	Biodiversity.....	6
4.3	Soils and Geology .....	7
4.4	Hydrology and Hydrogeology .....	7
4.5	Cultural Heritage .....	8
4.6	Air and Climate.....	9
4.7	Noise and Vibration.....	9
4.8	Landscape and Visual.....	9
4.9	Material Assets including Traffic, Utilities, and Waste .....	10
4.10	Cumulative Impacts.....	10
5	Screening Assessment.....	13
5.1	Characteristics of the Proposed Development .....	13
5.2	Location of the Proposed Development .....	15
5.3	Characteristics of Potential Impacts .....	17
6	Conclusions and Recommendations .....	19
	References.....	20
	Appendices .....	I

## List of Figures

Figure 2.1: Site location .....	2
Table 4.1: Natura 2000 sites assessed in the AA Screening for the proposed development .....	6
Figure 4.1: Flood Zones as in the SDCC SFRA .....	8
Figure 4.2: Archaeological features within 100m of the proposed development.....	9

## List of Tables

Table 5.1: Characteristics of the proposed development .....	13
Table 5.2: Location of the proposed development .....	15
Figure 5.3: Characteristics of Potential Impacts .....	17

## Abbreviations

- AA - Appropriate Assessment
- EIAR - Environmental Impact Assessment Report
- LAP - Local Area Plan
- NIAH - National Inventory of Architectural Heritage
- NMS - National Monuments Service
- SDCC - South Dublin County Council
- WFD - Water Framework Directive

# 1 Introduction

JBA Consulting Engineers and Scientists Ltd. (hereafter JBA) has been commissioned by South Dublin County Council to prepare an EIAR Screening Document for a proposed project to upgrade Killinarden Park and construct a combined pedestrian and cycle route linking Killinarden Park and Whitestown Way, along Whitestown Stream. The proposed development will be submitted under Part 8 of the Planning and Development Act (2000) as amended.

A separate Ecological Impact Assessment (EclA) and Appropriate Assessment (AA) Screening report have been carried out for the proposed development, and will also be submitted as part of the Part 8 application.

## 1.1 Purpose of this Report

The purpose of this report is to identify whether there is a need under the Planning and Development Act 2000, as amended, for an EIAR for the proposed development.

Schedule 5 (Parts 1 and 2) of the Act lists the groups of development projects which are subject to EIAR screening under the EIA Directive 2011/92/EU, as amended by Directive 2014/52/EU. Part 1 lists those projects which are automatically subject to an EIAR due to the scale and nature of the project. Part 2 lists projects which are also likely to have significant environmental effects based on the nature and size of the development set out by threshold criteria.

An additional group of projects, which are considered sub-threshold developments under Part 2, may fall below the thresholds set but may, under further analysis, be deemed to have significant effects due to their location within a catchment, size, or proximity to sensitive areas.

This report documents the methodology employed to determine whether the proposed development falls under any of these groups, and therefore will have significant environmental impacts. Rationale has been given for the decision made in reference to the relevant legislation, and additional documents have been referenced where required.

This report is intended for the project as described below. Any significant changes to the project description or location would require preparation of a new EIAR screening report.

An Appropriate Assessment (AA) Screening Report has been prepared by JBA Consulting and has identified any potential impacts to Natura 2000 sites and protected landscapes. This EIAR Screening document, along with the AA Screening Report, will be submitted as part of the Part 8 planning process for the proposed development.

## 2 Project Description

South Dublin County Council proposes to carry out the following project:

- Killinarden Park upgrade, total site area approx. 20ha; and
- Pedestrian and cycle corridor between Killinarden Park and Sean Walsh Park along Whitestown Stream, total site area approx. 4.50ha.

### 2.1 Proposed works

The proposed works comprise:

- Strategic walk/cycleway with bat sensitive lighting along Whitestown Stream; new and enhanced entrances, including new road crossings at Killinarden Heights, Whitestown Drive, Whitestown Way and Killinarden Way/Killinarden Estate (with a revised carriageway arrangement); feature areas at primary and secondary accesses; a Primary Oval footpath and walking/exercise circuit 1km in length; existing secondary footpath network retained and resurfaced where required; and a new footbridge crossing the Whitestown Stream within the park.
- Replacement and new park perimeter walls/railings where required; retention of existing private walls/railings.
- Linear play trails, seating; two natural play areas; outdoor fitness and calisthenics equipment; a Multi-use Games and Skate Area; upgrade of existing grass sports pitches, to include re-leveling where required.
- Biodiversity and landscape improvements including a community orchard; wildflower meadows; surface water swale; willow clumps; native woodland; informal tree groups; signature trees; and retention of existing tree groups and scrub where shown.
- Installation of CCTV Cameras for monitoring by An Garda Síochána and South Dublin County Council.
- All ancillary works.

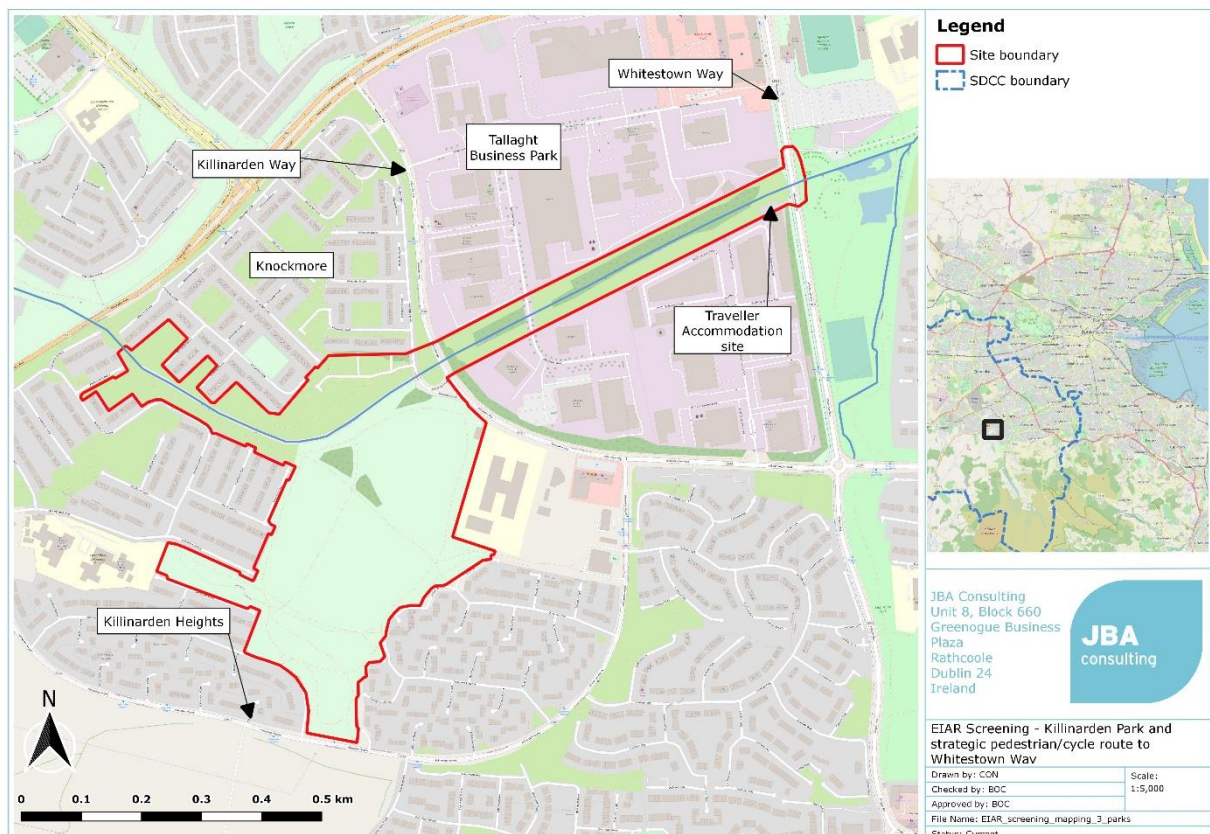


Figure 2.1: Site location

## 3 Purpose of Screening

### 3.1 Legislative Context for EIAR in Ireland

The EU has set out mandatory requirements for Environmental Impact Assessments under the EIA Directive 2011/92/EU (as amended by Directive 2014/52/EU). The Directive identifies certain project types, described under Annex I, that will always have significant environmental effects due to their nature and size. These projects are required to undergo an EIAR in every Member State.

For projects listed under Annex II, the EIA Directive gives Member States discretion to decide the limits of projects requiring an EIAR. In Ireland, mandatory thresholds have been set for projects that would otherwise fall under Annex II, which are described in Schedule 5 of The Planning and Development Regulations 2001 as amended. These thresholds are based on project characteristics including size and location. Projects within these thresholds are always subject to an EIAR. In some circumstances, projects considered below the thresholds set under Schedule 5 Part 2 may still be considered by the Planning Authority to have significant effects on the environment, such as in cases where the projects are in a location of particular environmental sensitivity and may also be subject to an EIAR. These sub-threshold projects are reviewed by the Planning Authority on a case-by-case basis.

The principal piece of legislation under which an EIAR may be undertaken for various developments is The Planning and Development Act 2000, as amended. Further regulations are explained in The Planning and Development (Environmental Impact Assessment) Regulations 2001-2018.

Legislation is examined below as to whether an EIAR will be required for this project.

### 3.2 The Planning and Development Act 2000 - Mandatory EIAR

The Planning and Development Act 2000, as amended, Section 172 sets out the types of projects that require an Environmental Impact Assessment Report (EIAR):

An environmental impact assessment shall be carried out by the planning authority or the Board, as the case may be, in respect of an application for consent for proposed development where either:

- a. the proposed development would be of a class specified in
  - i. Part 1 of Schedule 5 of the Planning and Development Regulations 2001, and either-
    - I. such development would exceed any relevant quantity, area or other limit specified in that Part, or
    - II. no quantity, area or other limit is specified in that Part in respect of the development concerned, or
  - ii. Part 2 of Schedule 5 of the Planning and Development Regulations 2001 and either-
    - I. such development would exceed any relevant quantity, area or other limit specified in that Part, or
    - II. no quantity, area or other limit is specified in that Part in respect of the development concerned, or
- b.
  - i. the proposed development would be of a class specified in Part 2 of Schedule 5 of the Planning and Development Regulations 2001 but does not exceed the relevant quantity, area or other limit specified in that Part, and
  - ii. the planning authority or the Board, as the case may be, determines that the proposed development would be likely to have significant effects on the environment.

#### 3.2.1 Part 1 of Schedule 5 of the Planning and Development Regulations 2001-2018

Projects which fall under Schedule 5, Part 1 are typically large, intensive infrastructure and energy projects and by their nature will always have significant environmental effects. The proposed park upgrade does not fall under Schedule 5, Part 1. Projects under Schedule 5, Part 2 are considered below.

### 3.2.2 Part 2 of Schedule 5 of the Planning and Development Regulations 2001-2018

With regards to Part 2 projects, the categories and thresholds were examined for the following category:

#### 10. Infrastructure projects

(a) Industrial estate development projects, where the area would exceed 15 hectares.

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

(ii) Construction of a car-park providing more than 400 spaces, other than a car-park provided as part of, and incidental to the primary purpose of, a development.

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

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

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

#### 12. Tourism and leisure

(a) Ski-runs, ski-lifts and cable-cars where the length would exceed 500 metres and associated developments.

(b) Sea water marinas where the number of berths would exceed 300 and freshwater marinas where the number of berths would exceed 100.

(c) Holiday villages which would consist of more than 100 holiday homes outside built-up areas; hotel complexes outside built-up areas which would have an area of 20 hectares or more or an accommodation capacity exceeding 300 bedrooms.

(d) Permanent camp sites and caravan sites where the number of pitches would be greater than 100.

(e) Theme parks occupying an area greater than 5 hectares.

The proposed development will consist of a park upgrade, included in which is improvements to access and circulation, boundary treatments, recreational facilities, and landscape and biodiversity, and a strategic pedestrian and cycle route linking Killinarden Park to Whitestown Way. The combined site area is just over 20 ha. Urban development in this context is considered to be projects with similar characteristics to car parks, shopping centres, construction of housing developments, hospitals, sports stadiums, cinemas, and infrastructure projects such as construction of sewerage and water supply networks (European Commission, 2015). The proposed park upgrade and pedestrian and cycle route does not fall under the categories above. Therefore, an EIAR has not been automatically triggered for this proposed development.

The proposed development does not fall under Parts 1 or 2 of Schedule 5. Under Section 172 however, it is necessary to consider if this development could result in significant environmental effects under the category of sub-threshold developments.

### 3.3 Sub-threshold EIAR Guidance for Consent Authorities

In accordance with the requirement to submit an EIAR with sub-threshold planning application (Article 103 of the Planning and Development Regulations 2001-2018), where a planning application for sub-threshold development is not accompanied by an EIAR, and the Planning Authority considers that the development is likely to have significant effects on the environment it shall, by notice in writing, require the applicant to submit an EIAR. This process therefore occurs after submission of an application, if that application is not accompanied by an EIAR. In the case of the proposed development, a precautionary approach has been taken and it was decided to proceed with an EIAR Screening, despite the project not falling under any categories under Schedule 5 (outlined in Section 3.2).

The decision as to whether a development is likely to have ‘significant effects’ on the environment must be taken with reference to the criteria set out in Schedule 7A of the Planning and Development Regulations 2001-2018. Schedule 7A requires that the following information be provided for the purposes of screening sub-threshold development for EIAR:

1. A description of the proposed development, including in particular—



- a) a description of the physical characteristics of the whole proposed development and, where relevant, of demolition works, and
  - b) a description of the location of the proposed development, with regard to the environmental sensitivity of geographical areas likely to be affected.
2. A description of the aspects of the environment likely to be significantly affected by the proposed development.
3. A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from—
- a) the expected residues and emissions and the production of waste, where relevant, and
  - b) the use of natural resources, in particular soil, land, water and biodiversity.
  - c) The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7 of the Planning and Development Regulations 2001-2018 (DHPLG 2018).

In order to assist planning and other consenting authorities in deciding if significant effects on the environment are likely to arise in the case of development below the national mandatory EIAR thresholds, the Minister for the Environment, Heritage and Local Government published a Guidance document in August 2003, the Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding Sub-threshold Development and the Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (DHPLG 2018b).

The criteria, as transposed in Irish legislation, are grouped under three headings:

- i. Characteristics of Proposed Development
- ii. Location of Proposed Development
- iii. Characteristics of Potential Impacts

For the purposes of assessing if the development is likely to have significant effects on the environment in reference to these three parameters, the project is examined below in further detail.

## 4 Overview of Environmental Impacts

An overview of the predicted environmental impacts likely to occur as a result of the proposed upgrade works to Killinarden Park and proposed pedestrian and cycle route linking Killinarden Park and Whitestown Way is provided below, according to the themes as presented in an EIAR and outlined in Annex IV (4) of the EIA Directive.

### 4.1 Population and Human Health

There is a risk to the health and safety of workers on the development, as with any construction project. This will be mitigated against by the operational plans devised by the appointed contractor, following best practice guidance.

Once operational, the proposed development will bring a positive impact to population and human health, by providing an attractive amenity for recreation that both locals in surrounding communities and commuters cycling through the park can make use of.

### 4.2 Biodiversity

Ecological receptors that must be examined include protected Natura 2000 sites under the Habitats Directive (92/43/EEC) and Birds Directive (2009/147/EC), as well as species protected under the Wildlife Act (1976), and any ecological receptors which may be negatively impacted by the proposed development, both directly and indirectly.

#### 4.2.1 Proximity to Natura 2000 sites

An Appropriate Assessment (AA) Screening has been completed by JBA for this project to determine whether there is a potential for impacts on nearby Natura 2000 sites. Those sites within 15km of the proposed development are shown in Table 4.1. All other Natura 2000 sites were screened out.

The AA Screening determined that there are no likely significant impacts on any Natura 2000 sites as a result of the proposed development.

Table 4.1: Natura 2000 sites assessed in the AA Screening for the proposed development

Natura 2000 site	Site Code	Approximate direct distance from site
Glenasmole Valley SAC	001209	2.0km
Wicklow Mountains SAC	002122	4.0km
Wicklow Mountains SPA	004040	7.5km
South Dublin Bay and River Tolka Estuary SPA	004024	12.6km
South Dublin Bay SAC	000210	12.6km
North Bull Island SPA	004006	15.6km
North Dublin Bay SAC	000206	15.6km

#### 4.2.2 Other ecological receptors

An Ecological Impact Assessment (EclA) has been completed by JBA for this development. This assessment included field surveys and desktop investigation.

The EclA found that there is potential for a temporary minor decrease in water quality in Dodder Valley pNHA as a result of the construction phase of the proposed development. Pollution prevention measures have been outlined in the EclA, and no significant residual impact is anticipated once mitigation is implemented.

Bats are expected to experience a long-term minor impact due to lighting in the operational phase of the development. The installation of sensitive lighting design and retention of a dark corridor, as recommended in the EclA and outlined in the Lighting Report prepared for the development by Fahey O'Riordan Consulting Engineers, ensures that there will only be a small residual impact on bats from introduced lighting.

The proposed lighting for the strategic walkway/cycleway will include the use of:

- Dark buffers, illuminance limits, and zonation;
- Low wattage/low intensity LED source with a warm white spectrum and directional hood and lenses with zero percent upward light output ratio. This will light the path and minimise light spill to either side of the path;
- Motion sensors, to ensure an automatic reduction in light output when the pathway/cycleway is not in use;
- Luminaires will be mounted at a height of 6m, to optimise spacing and to minimise light spill;
- The Lighting scheme has been modelled, with calculated lighting results produced. The modelled lux levels for the strategic route are such that no negative impacts on bats are likely, with minimal spill outside the strategic route itself.

Bats are also expected to experience a long-term positive impact through increase in foraging and commuting habitat as a result of the proposed development.

The EclA recommended that monitoring of the local bat population by a suitably qualified ecologist be undertaken annually, to ensure that a dark corridor is maintained along Whitestown Stream and the monitor that the species and number of bats is improving. The ecologist can also recommend suitable locations for any bat boxes that are to be erected after tree planting has taken place.

The EclA found that the proposed pedestrian and cycle track along Whitestown Stream has the potential to impact on a number of habitats of local importance, as well as breeding birds, bats, Kingfisher, and several mammal species. However, based on the proposed design of the scheme and the implementation of mitigation measures outlined in the EclA, there are no significant residual impacts anticipated.

### 4.3 Soils and Geology

The underlying bedrock of the site is composed of dark limestone and shale. The subsoil on site is made ground.

### 4.4 Hydrology and Hydrogeology

#### 4.4.1 Surface Water

The proposed site lies within the Water Framework Directive (WFD) Liffey and Dublin Bay catchment and Dodder\_SC\_010 sub-catchment (EPA, 2020).

Whitestown Stream runs through the site from west to east, along the northern perimeter of Killinarden Park, before crossing beneath Killinarden Way and running through a corridor of land between Tallaght Business Park and South City Business Park. The reach within the Killinarden Park boundary was not itself assigned a WFD status for the latest reporting period. However, the section of Whitestown Stream between Killinarden Way and Whitestown Way, along the southern side of which will be the pedestrian and cycle track, is classed as Poor Status (EPA, 2020).

A Strategic Flood Risk Assessment (SFRA) was completed as part of the South Dublin CDP 2016-2022. The development site is outside Flood Zone A (1 in 100 chance in any given year). However, there are small areas in the northern parts of Killinarden Park and along Whitestown Stream, particularly at its eastern end at Whitestown Way, which are within the 1 in 1000-year flood zone (0.1% AEP). These are shown in Figure 4.1.

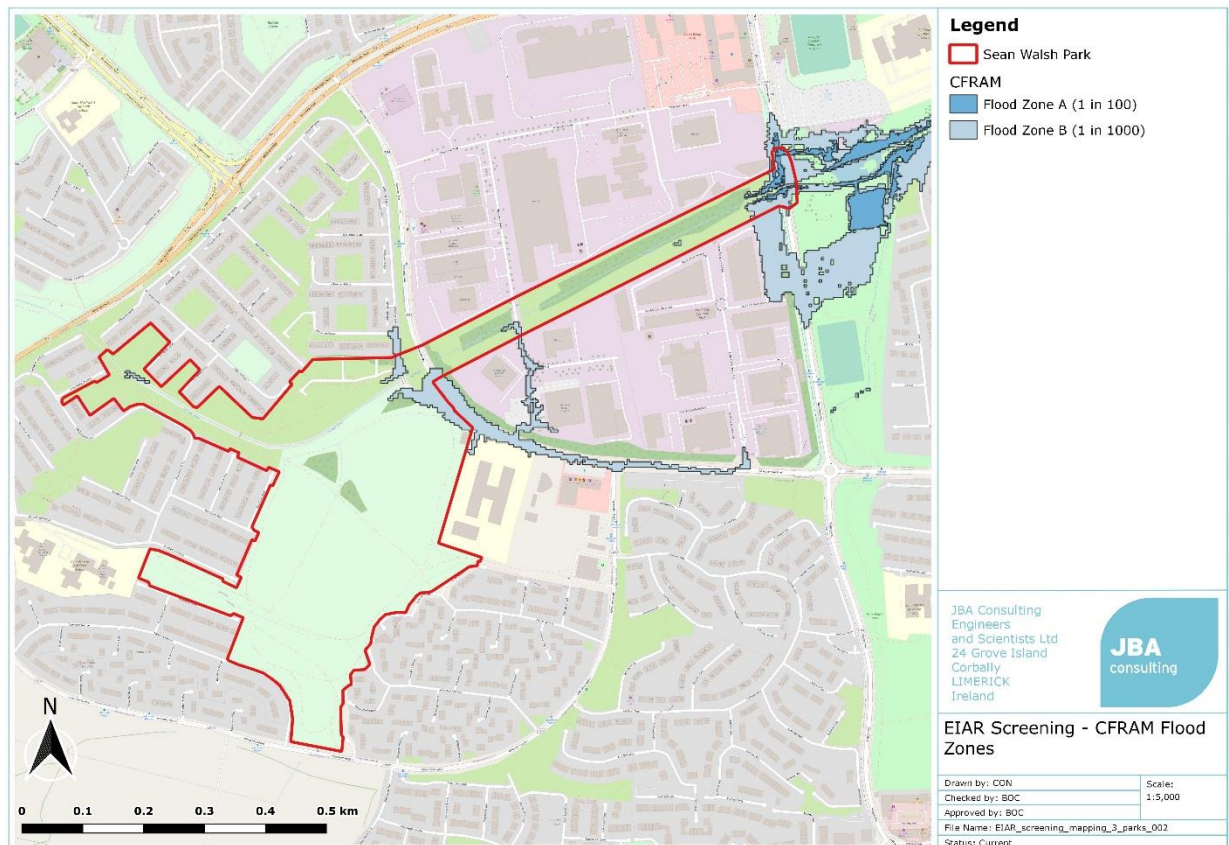


Figure 4.1: Flood Zones as in the SDCC SFRA

#### 4.4.2 Groundwater

Groundwater vulnerability within the majority of the site is Low, indicating that those parts of the site have a low likelihood of groundwater contamination. At the southern edge of Killinarden Park, a small section grades from Low Vulnerability to Moderate and then High.

#### 4.4.3 Hydrological Impacts

During construction, there is potential for emissions of dust and silt into waterways. This could therefore lead to a reduction in water quality of Whitestown Stream. Mitigation measures to combat this will be outlined in the operating plans to be developed by the on-site contractor.

Once operational, the proposed development in Killinarden Park is likely to bring a positive impact to Whitestown Stream as it flows through the park. The riparian corridor is to be improved, with clumps of willow enhancing habitat creation along the stream, while the drainage swale to be installed along the park's western boundary will improve stormwater management and surface water runoff in the park.

#### 4.5 Cultural Heritage

There is one listed archaeological feature within 100m of the proposed development. A record is on the National Monuments Service of an enclosure (DU021-056) located on the southwest side of Killinarden Park, along Knockmore Avenue (Figure 4.2). No further information on this record is available on the archaeology.ie website, however the area is fully developed with housing at present and no trace of the enclosure is visible on the surface.

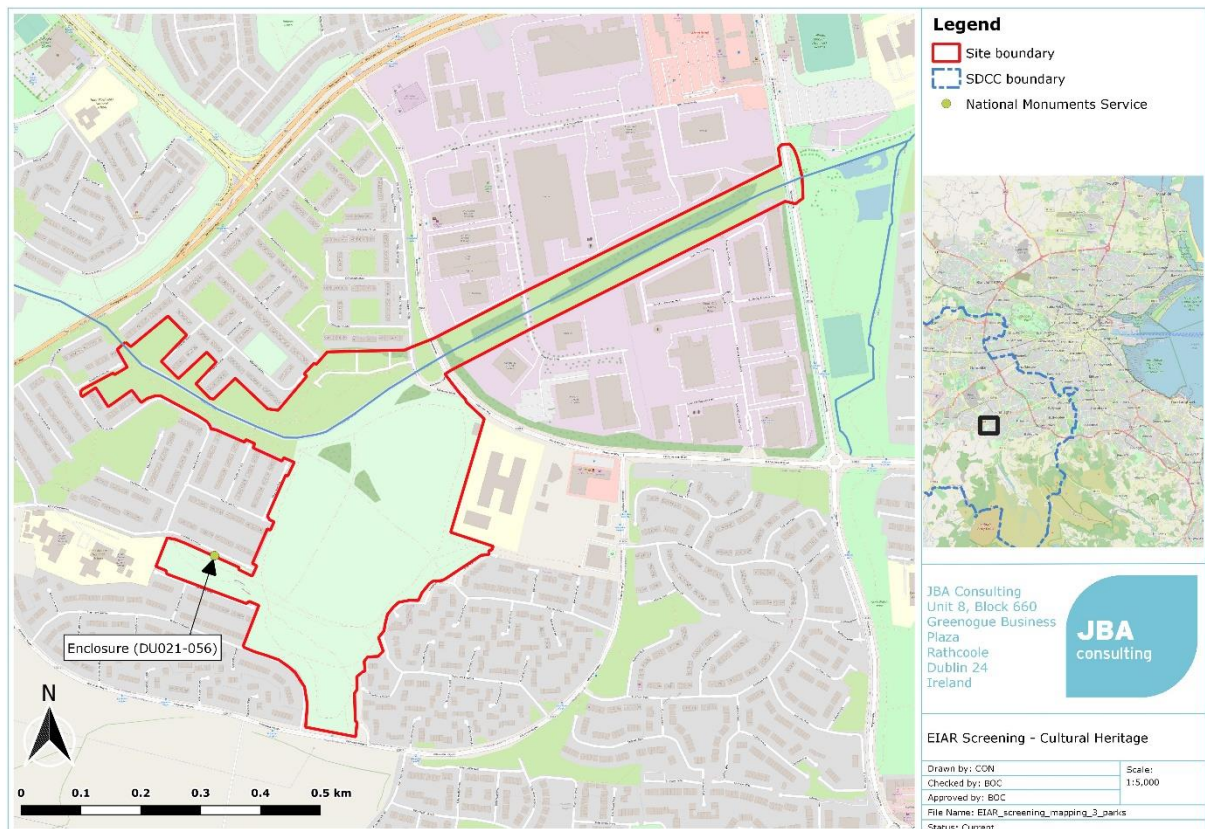


Figure 4.2: Archaeological features within 100m of the proposed development

There are no structures listed on the National Inventory of Architectural Heritage (NIAH) that lie within 100m of the proposed development.

#### 4.6 Air and Climate

There is potential for impacts to air quality through emissions during the construction phase of the development, due to the operation of machinery on site and transport of materials to and from the site. These impacts would be mitigated against with measures outlined in the contractor's operating plans.

The proposed development will not give rise to any significant impacts on air quality or climate during the operational period. There will be some positive impacts to air quality and climate due to the improved pedestrian and cycling facilities created by the development, which may encourage some transport modal shift in the surrounding area.

#### 4.7 Noise and Vibration

There is potential for localised noise and vibration impacts during the construction phase due to operation of machinery on site. These impacts would be temporary and only during the construction phase. Mitigation measures against such impacts will be outlined in the operating plans to be devised by the contractor.

The proposed development will not lead to any significant noise or vibration impacts during the operational period.

#### 4.8 Landscape and Visual

The proposed development will give rise to temporary visual impacts to residents living in proximity to the development during the construction phase.

When operational, the development will be low impact for surrounding landowners. The development will provide an improved visual amenity for residents and those using the area of Killinarden Park, with extensive landscaping and native planting to take place.

## 4.9 Material Assets including Traffic, Utilities, and Waste

### 4.9.1 Traffic

There may be some localised impacts on traffic associated with the construction phase of the development. These will be temporary and limited in scope, and mitigated by operating plans devised by the on-site contractor.

The development will improve pedestrian and cycling links in the area, providing a positive impact on traffic. The pedestrian and cycle corridor will form part of a strategic route, linking Killinarden Park and the surrounding residential areas in the west with Sean Walsh Park

### 4.9.2 Utilities

During construction, there is a risk of encountering underground utilities (electricity, gas, or water), as with any construction activity. Construction activities requiring excavation will require consultation with the relevant stakeholders for these utilities. Mapping of utility locations will be obtained by the appointed contractor.

Overall, there are no predicted significant impacts to utilities in the vicinity of the proposed development once operational.

### 4.9.3 Waste

During construction, the proposed development will generate a small amount of typical construction waste. This will be disposed of following best practice guidance implemented by operating plans to be devised by the appointed contractor.

Once operational, the proposed development will not produce waste.

## 4.10 Cumulative Impacts

### 4.10.1 Plans

#### South Dublin County Development Plan 2016-2022

South Dublin County Development Plan 2016-2022 has been prepared in accordance with the Planning and Development Act 2000. The plan sets out the overall strategy for planning and sustainable development in the country. The land the site is on is zoned Objective OS: To preserve and provide for open space and recreational amenities.

#### Tallaght Town Centre Local Area Plan 2020

Whitestown Stream lies within the Tallaght Town Centre Local Area Plan (LAP) 2020. Several of the overarching objectives within the LAP are relevant to the proposed development. These are:

- Deliver a network of connected neighbourhoods;
- Deliver sustainable residential communities;
- Respect, protect, and promote our heritage and architectural features;
- Proactively plan for climate change;
- Mitigate climate change.

In addition to these overarching objectives, the plan outlines a vision of what should be delivered within the LAP's lifetime. This includes:

- Provision of cycling and pedestrian infrastructure links;
- Enhancement of existing green spaces;
- Creation of a network of public open spaces.

Within the LAP, Whitestown Stream and the business parks to the north and south have several key objectives. Those which are relevant to the proposed development are as follows:

- WT2: Improve legibility throughout the area and new points of access from surrounding areas.
- WT3: Improve interface with existing and proposed primary and secondary routes.

- WT4: Provide new green infrastructure and amenity corridor along Whitestown Stream connecting Killinarden Park and Sean Walsh Park. Prior to any works being carried out to open up the Whitestown Stream as a cycling / pedestrian corridor, an Ecological Impact Assessment of proposals should be undertaken, which should include detailed ecological surveys of the Whitestown section of the Whitestown Stream.
- WT5: Retain and enhance setting of stream.
- WT6: Engage with relevant stakeholders, including landowners, to enhance interface with the N81 as part of the future landscape plan for the N81.

#### 4.10.2 Projects

There are several recent planning applications in the vicinity of the proposed project. Larger development planning applications in the near vicinity from the last three years that have been granted permission are listed below. Applications for retention, home extensions and/or internal alterations are not considered.

Planning Application Reference	SD188/0004 - Application under Part VIII
<b>Development address</b>	Killinarden Heights, Tallaght, Dublin 24
<b>Description:</b>	Social Housing Development consisting of 7 housing units and 6 apartment units, 13 units in total, on undeveloped lands on a site located at Killinarden Heights, adjacent to Knockmore Avenue (adjoining St. Catherine's House) Killinarden, Tallaght, Dublin 24 consisting of: 7 3-bed, 2 storey houses, 6 2-bed apartments (3 storey). The works include: New access off Killinarden Heights, landscaping works to boundaries, ancillary works, landscaping works, 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.
<b>Final Decision on Application</b>	Part VIII approved by Council
<b>Decision Date</b>	10-Sep-2018

Planning Application Reference	SD19A/0334
<b>Development address</b>	Killinarden Heights, Killinarden, Tallaght, Dublin 24
<b>Description:</b>	Residential development consisting of 16 two storey houses comprised of 1 four bed detached house; 6 three bed semi-detached houses & 9 two and three bed terraced houses; access to the proposed development will be via a new vehicular access road located off the existing Elder Heath Drive to the south of the subject site; including all associated development works, internal roads, drainage, landscaping etc; all on a site of circa 0.81 hectares located at Killinarden Heights and when finished will form part of the existing Elder Heath estate.
<b>Final Decision on Application</b>	Grant permission
<b>Decision Date</b>	19-Jun-2020

Planning Application Reference	SD17A/0245
<b>Development address</b>	Plant 2 C-FAB Building, Whitestown Road, Whitestown Industrial Estate, Tallaght, Dublin 24
<b>Description:</b>	(i) A first floor mezzanine extension (106sq.m) to provide ancillary office space; (ii) new entrance lobby on north elevation, with new canopy and screen walling, cladding and signage and all site development works.
<b>Final Decision on Application</b>	Grant permission
<b>Decision Date</b>	09-Oct-2017

Planning Application Reference	SD18A/0128
<b>Development address</b>	Unit K, South City Business Park, Whitestown Way, Tallaght, Dublin 24
<b>Description:</b>	Material change of use of part of the ground floor from warehouse to staff canteen, trade counter and office space. The development will also consist of modifications to the external fabric of the existing warehouse comprising a new trade entrance and new windows at the front facade, together with all associated site works.
<b>Final Decision on Application</b>	Grant permission
<b>Decision Date</b>	12-Jun-2018

<b>Planning Application Reference</b>	<b>SD188/0008</b>
<b>Development address</b>	Tallaght Stadium, Sean Walsh Park, Whitestown Way, Tallaght, Dublin 24
<b>Description:</b>	Older person's residential development consisting of: a range of 2 storey to 4 storey apartments which shall consist of 81 units and associated car parking comprising:- 18 2-bedroom 3 person units, 63 1-bed 2 person units, new access road off Whitestown Way, communal facilities, including an office, communal living room, wc's, laundry and mobility store; renewable energy design measures for each dwelling; communal open space with perimeter fencing to southern boundary; ESB substation; temporary construction signage; estate signage; site perimeter boundary treatment; and all other associated site works.
<b>Final Decision on Application</b>	Part 8 Approved
<b>Decision Date</b>	10-Dec-2018

The potential for cumulative impacts arising from the above-mentioned plans and applications will be assessed below in Section 5.



## 5 Screening Assessment

### 5.1 Characteristics of the Proposed Development

To determine whether the characteristics of the proposed development are likely to have significant impacts on the environment, the following questions are answered in Table 5.1, following guidelines set out in Guidance for Consenting Authorities regarding Sub-Threshold Development (DoEHLG, 2003), as outlined in Section 3.3 of this Report.

Table 5.1: Characteristics of the proposed development

Characteristics of the Proposed Development - Screening Questions	Comment
<b>Could the scale (size or design) of the proposed development be considered significant?</b>	No. The proposed development is for a park upgrade, approximately 20 ha, and a pedestrian and cycle route linking Killinarden Park with Whitestown Way, approximately 4.5 ha. The park is already present, with no additional land take occurring as part of the development. Works will be confined mainly to landscaping, access point enhancements, and boundary treatment. For the reasons outlined, the scale of the proposed development is not considered to be significant.
<b>Considered cumulatively with other adjacent proposed developments, would the size of the proposed development be considered significant?</b>	No. A number of planning applications have been granted permission in the area around the proposed development in the last three years. The applications are all small scale. As such, the cumulative effect of the entire project (the upgrade works to Killinarden Park and the pedestrian/cycle route between Killinarden Park and Whitestown Way) is not expected to be significant.  The site has been zoned in the County Development Plan as OS: To preserve and provide for open space and recreational amenities.
<b>Will the proposed development utilise a significant quantity of natural resources, in particular land, soil, water or biodiversity?</b>	No. There will be no additional land take as a result of the development. Existing tree groups in the park are to be retained as part of the design, with additional planting of trees and native wildflowers and vegetation taking place throughout. Existing trees and scrub along Whitestown Stream are to be retained and managed for biodiversity as part of the pedestrian and cycle route.
<b>Will the proposed development produce a significant quantity of waste?</b>	No. Waste will be produced only during the construction phase of the development. During this phase, should excavated materials require off-site removal, they will be tested to determine the most appropriate means of disposal, and disposed of at appropriately licenced or permitted sites. This will be detailed in the operating plans to be devised by the contractor.  The proposed development will not produce waste once operational.
<b>Will the proposed development create a significant amount or type of pollution?</b>	No. During construction, the contractor will follow best practice guidance and procedures outlined in operating plans to avoid instances of pollution.

	Once operational, the development will not produce pollution.
<b>Will the proposed development create a significant amount of nuisance?</b>	No. During construction, some noise will be created, however this will be temporary and short-term. Construction works will be limited to certain times of day to avoid nuisance to local residences.
<b>Will there be a risk of major accidents having regard to substances or technologies used?</b>	No. The risks of this development will be those typically associated with normal construction practices.  Construction machinery will be used during the construction phase and will be operated by licensed contractors, and following site-specific operating procedures to be devised by the contractor.
<b>Will there be a risk of natural disasters which are relevant to the project, including those caused by climate change?</b>	Small sections of the development site, at the north of Killinarden Park and at Whitestown Way, area within the 0.1% AEP zone in the SDC SFRA. Given the nature of the proposed development and small area affected, the risk posed by flooding is low.
<b>Will there be a risk to human health (for example due to water contamination or air pollution)?</b>	No. Any potential risk to human health will be as a result of the construction phase of this project. All contractors will be subject to best practice methodologies and risk assessments in order to minimize any risk to human health.  Once operational, the proposed development is likely to have a positive impact on human health for local residents and users of the park and route.
<b>Would any combination of the above factors be considered likely to have significant effects on the environment?</b>	No. The development is relatively small scale. Environmental impacts are predictable and easily mitigated through the use of standard best practice guidance during the construction phase. As such, significant impacts on the environment are not expected as a result of the proposed development.

Conclusion: The characteristics of the proposed development are not considered likely to result in a significant impact on the environment by virtue of its size, nature, or operational activities.

Reasoning: The proposed park upgrade and pedestrian and cycle route are relatively small in extent, limited largely to the pathways, landscaping, access improvements, and boundary treatments. Any environmental or noise impacts will be during the construction phase and not during the operational phase of the development. Construction will not require a significant use of natural resources, nor will it generate significant amounts of waste.

## 5.2 Location of the Proposed Development

The following questions are answered below in Table 5.2 to determine whether the geographical location of the proposed development can be considered ecologically or environmentally sensitive.

Table 5.2: Location of the proposed development

Location of the Proposed Development - Screening Questions	Comment
<b>Has the proposed development the potential to impact directly or indirectly on any site designated for conservation interest (e.g., SAC, SPA, pNHA)?</b>	No. The AA Screening for the site concluded that there are no likely significant impacts to Natura 2000 sites as a result of the proposed development.
<b>Has the proposed development the potential to impact directly or indirectly on any habitats listed as Annex I in the EU Habitats Directive?</b>	No. The AA Screening found no potential for impacts on any habitats listed as Annex I in the EU Habitats Directive.
<b>Has the proposed development the potential to impact directly or indirectly on any habitats listed as Priority Annex I in the EU Habitats Directive?</b>	No. The AA Screening found no potential for impacts on any habitats listed as Priority Annex I in the EU Habitats Directive.
<b>Has the proposed development the potential to impact directly or indirectly on any species listed as Annex II in the EU Habitats Directive?</b>	No. The AA Screening found no potential for impacts on any species listed as Annex II in the EU Habitats Directive.
<b>Has the proposed development the potential to impact directly or indirectly on the breeding places of any species protected under the Wildlife Act?</b>	<p>No. The EclA found no potential for impacts on the breeding places of any species protected under the Wildlife Act. Bats were found to be using the Park for foraging and commuting. However, the Park is considered to be of negligible roosting importance.</p> <p>A Lighting Report prepared by Fahey O'Riordan Consulting Engineers has outlined bat-sensitive lighting design and modelled lux levels for the strategic footpath/cycleway, which will ensure that no significant negative impact results from the proposed development.</p>
<b>Has the proposed development the potential to impact directly or directly on the existing or approved land use?</b>	<p>No. The proposed development is in line with the approved land use under the SDCC CDP; 'OS: To preserve and provide for open space and recreational amenities'. The existing land use and proposed land use are the same.</p> <p>The Tallaght LAP objective WT 4 is to provide a new amenity corridor for pedestrians and cyclists along Whitestown Stream that will connect Killinarden Park with Sean Walsh Park. The proposed pedestrian and cycle route is in line with this.</p>
<b>Has the proposed development the potential to significantly impact directly or indirectly the relative abundance, availability, quality or regenerative capacity of natural resources (including soil, land, water</b>	No. The proposed development will not impact the relative abundance, availability, or regenerative capacity of natural resources. There will be no additional land take as part of the proposed development. Existing tree groups and scrub are to be retained, and there will be extensive planting of wildflowers and native vegetation.

<b>and biodiversity) in the area and its underground?</b>	
<b>Has the proposed development the potential to impact directly or indirectly on any protected structures or Recorded Monuments and Places of Archaeological Interest?</b>	No. Excavation required on site is minimal. One recorded archaeological monument, DU021-056, is situated adjacent to the site at Knockmore Avenue, however it is not visible on the surface.
<b>Has the proposed development the potential to impact directly or indirectly on listed or scenic views or protected landscapes as outlined in the County Development Plan?</b>	No.

Conclusion: The location of the proposed development is not considered likely to result in a significant impact on the environment.

Reasoning: The proposed development is located in an existing park, and is zoned appropriately for the proposed park upgrade and pedestrian and cycle route. The pedestrian and cycle route is in line with Objective WT 4 of the Tallaght LAP. There are no Natura 2000 sites or designated ecological sites which will be impacted by the proposed development.

### 5.3 Characteristics of Potential Impacts

The following questions were answered in Table, in line with Guidance on EIA Screening - June 2001, prepared for the European Commission by ERM (UK), to determine whether the environmental impacts of the development can be considered significant.

Figure 5.1: Characteristics of Potential Impacts

Characteristics of Potential Impacts - Screening Questions	Comment
<b>Will there be a large change in environmental conditions?</b>	No. The proposed use is the same as existing, and the proposed development will be low impact.
<b>Will new features be out of scale with the existing environment?</b>	No. The proposed development is set to the same scale as the existing park features.
<b>Will the effect be particularly complex?</b>	No. The primary environmental impacts are expected to occur during the construction phase, and will be mitigated in the operating plans to be devised by the contractor. These include temporary impacts to surface water quality, air quality, noise and vibration, and through the generation of waste.  Once operational, environmental impacts will be negligible, or largely positive.
<b>Will the effect extend over a large area?</b>	No. Given the small scale and nature of the proposed development this is highly unlikely.
<b>Will there be any potential for trans-frontier impacts?</b>	No.
<b>Will many people be affected?</b>	Only residents and business owners in the local vicinity will be affected by the construction phase, however such impacts will be temporary.  Once operational, the local residents and commuters will experience a positive impact as a result of the development.
<b>Will many receptors of other types (fauna and flora, businesses, facilities) be affected?</b>	No. The AA and EclA, both prepared by JBA Consulting found that the potential impacts arising from this development will be limited in terms of biodiversity and temporal scale.  Impacts on other receptors are expected to be temporary and limited to the construction phase.
<b>Will valuable or scarce features or resources be affected?</b>	No. There will be no effect on scarce features or resources.
<b>Is there a risk that environmental standards will be breached?</b>	No. The appointed contractor will be contractually obligated to follow environmental guidance and standards, which will be outlined in the contract documents and operating plans devised for construction.
<b>Is there a risk that protected sites, areas, features will be affected?</b>	No.
<b>Is there a high probability of the effect occurring?</b>	No.
<b>Will the effect continue for a long time?</b>	No. Potential impacts would be brief to temporary, only occurring occasionally within the construction phase of the development or in the case of a breach of environmental standards.

<b>Will the effect be permanent rather than temporary?</b>	No. Potential impacts would be temporary.
<b>Will the impact be continuous rather than intermittent?</b>	No. Potential impacts would be intermittent.
<b>If it is intermittent will it be frequent rather than rare?</b>	No. Potential impacts would be rare, occurring only in the case of accidental breach of environmental standards during the construction phase.
<b>Will the impacts be irreversible?</b>	No.
<b>Will it be difficult to avoid, or reduce or repair or compensate for the effect?</b>	No. Mitigation measures to be put in place during construction will be sufficient to avoid or reduce potential impacts.

Conclusion: The characteristics of the potential impacts as a result of the proposed development are unlikely to be significant and are easily mitigated.

Reasoning: The potential impacts from this development would be primarily during the construction phase. It is easy to predict these impacts and mitigate them through the use of standard environmental procedures.

## 6 Conclusions and Recommendations

The purpose of this report was to identify whether there is a need under the Planning and Development Act 2000, as amended, for an EIAR for the proposed upgrade of Killinarden Park, Tallaght.

The proposed development comprises upgrades to the park in a number of areas, including access and circulation, facilities and amenities, boundary treatments, and landscape and biodiversity, as well as provision of a pedestrian and cycle route along Whitestown Stream, linking Killinarden Park with Whitestown Way.

It was determined that the proposed development does not fall under Schedule 5 (Parts 1 and 2) of the Act. As such, an EIAR has not been automatically triggered. To determine whether the development may fall under the category of Sub-threshold development, with the potential to give rise to significant environmental effects, a screening exercise was undertaken.

During construction, typical impacts such as noise, dust, traffic disruption, and the generation of small amounts of waste are to be expected. These are typical construction phase impacts, and will be mitigated against by environmental operating plans devised by the on-site contractor, following best practice guidance.

The EclA prepared for the proposed development found that there is potential for minor impacts on bats using the site for commuting and foraging. With sensitive lighting design and mitigation measures in place, as outlined in the Lighting Report prepared by Fahey O'Riordan Consulting Engineers, there is no likely significant impact on bats. It is further recommended in the EclA that a suitably qualified ecologist conduct monitoring on an annual basis following construction to ensure that there is no significant negative impact on bats. The ecologist may also make recommendations on the location of bat boxes to be placed following tree planting.

Once operational, the proposed development is expected to be low in environmental impact, with largely positive impacts. The site is zoned for open space and amenity in the SDCC CDP. The development will provide an important amenity for the local residents of Tallaght, in line with the CDP, and will bring positive impacts on amenity value and biodiversity.

It has been concluded that the proposed development does not fall under the category of sub-threshold development, and thus an EIAR is not required.

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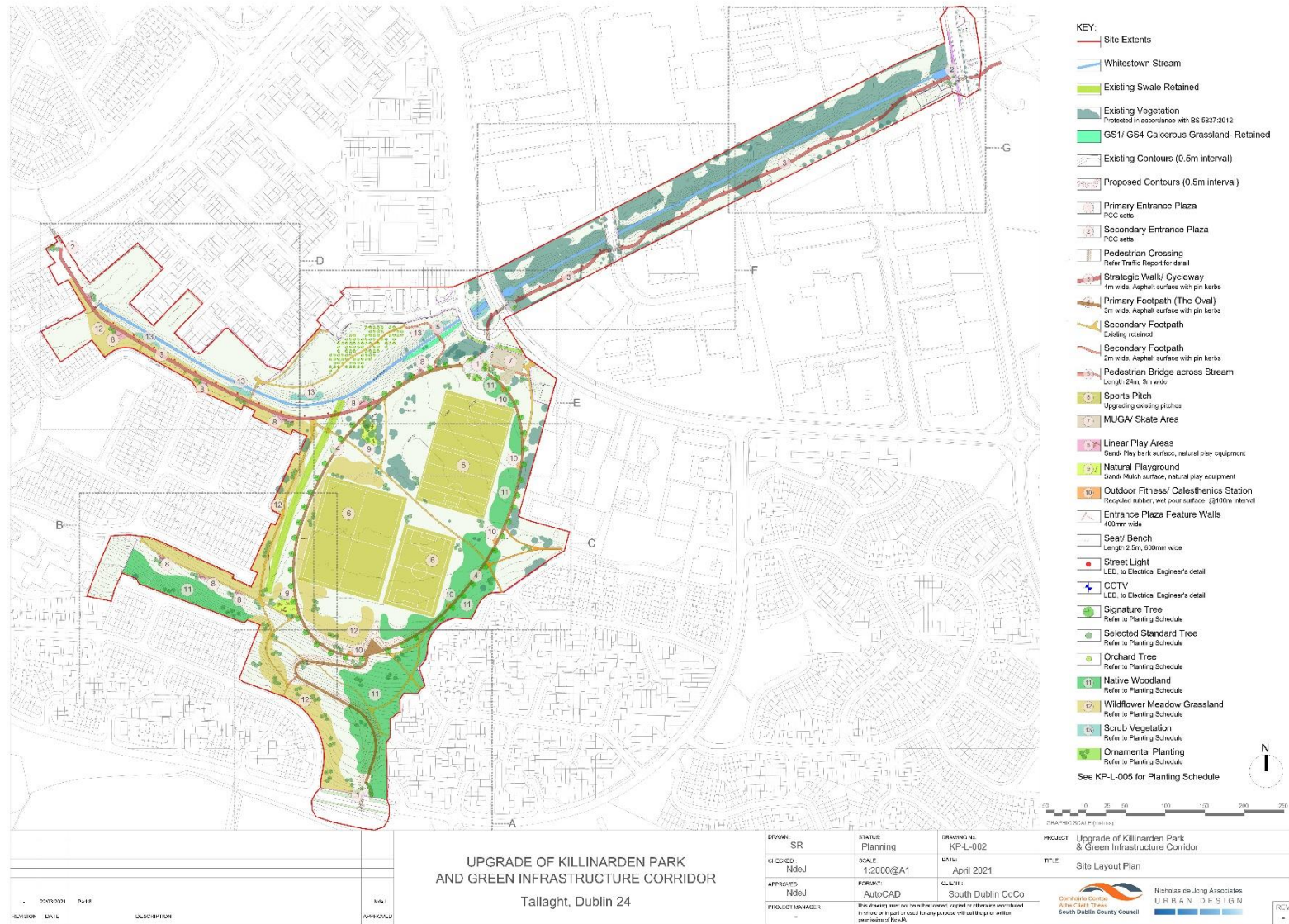
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# Appendices



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