

INITIAL EIAR ADDENDUM REPORT

PREPARED AS PART OF A

LARGE SCALE RESIDENTIAL DEVELOPMENT PLANNING APPLICATION

AMENDING SHD PERMISSION ABP REF.: 312170-21

ON A SITE AT

Marmalade Lane, Wyckham Avenue, Dublin 16

SUBMITTED ON BEHALF OF 1 Wyckham Land Limited

OCTOBER 2025

INTRODUCTION

This EIAR Addendum Report accompanies an LRD application by 1 Wyckham Land Limited under Section 32 of the Planning and Development Act (Amendment) (Large-scale Residential Development), for modifications/amendments to a residential development permitted under SHD ABP-312170-21.

This report provides details of the proposed modifications and amendments to the permitted development, the site context and an assessment of the potential impacts associated with the proposed modifications in terms of the potential environmental impacts and effects that may arise.

PURPOSE OF THIS REPORT

The purpose of this EIAR Addendum Report is to provide the necessary environmental information to enable an informed determination of whether consent should be granted for the proposed modifications to the permitted development.

The proposed amendment application is described as follows:

The proposed development will amend permitted Strategic Housing Development (SHD) ACP Reg. Ref.: 312170-21 which was granted for 531 no. residential units within 5 blocks A-E along with accesses, car, motorcycle and cycle parking, residential amenity and public and communal open space along with all associated works.

The amendment proposed will replace permitted Block E in the south-west corner of the site (which comprised a total of 68 no. units) with 8 no. semi-detached, 3 storey houses. All associated works to accommodate this change are proposed including car and cycle parking, public open space and associated ancillary works.

There is no change proposed to permitted Blocks A-D and all aspects of the development as per Reg Ref ABP-312170-21 will be completed as permitted. A total of 471 no. units, 60 no. less than permitted, will be delivered as a result of this proposed development.

A Natura Impact Statement (NIS) have been prepared in respect of the proposed development. All application documentation and information is available to view online at the following website set up by the applicant:
<https://www.marmaladelandamendmentlrd.ie/>.

The site is located to the south and east of Gort Muire, Carmelite Order, Dundrum, Dublin 16 and is accessed off Wyckham Avenue, off Wyckham Way. St Tiernan's school is located to its immediate north. To the south and east of the site are mature, low density, two storey residential developments, including Parkvale and Wesley Lawns.

The site currently comprises a permitted residential site, works have commenced on site. The lands fall from the southern boundary to the northeast corner with variations across the site of c.10m.

The subject site relating to this amendment application site is subject to the zoning "*Objective A: To provide residential development and improve residential amenity while protecting the existing residential amenities*". The boundaries of the site are also subject to an objective "*to protect and preserve trees and woodlands*".

The proposed amendments, resulting in a reduction in overall unit numbers, and is considered a sub-threshold development. However, it was deemed appropriate to prepare an addendum to the EIAR

which had submitted with the parent permission ABP Reg. Ref. ABP-312170-21 in line with good planning practice.

The proposed amendments do not impact the relevant classes of development for EIA thresholds. Accordingly, an EIA is not mandatory for the proposed amendments.

Unit type	Studios	One Beds	Two Beds	Three/Four Beds	Total
LRD Permission	28 (5%)	297 (56%)	197 (37%)	9 (2%)	531
Amendments	25 (5%)	256 (54%)	173 (37%)	17 (4%)	471
Difference	(-3)	(-41)	(-24)	(+8)	(-60)

Table 1: Proposed type units

Each element of the environment assessed in the EIAR accompanying the parent application is addressed below for completeness. A qualified specialist for each of the individual chapters originally assessed as part of the EIAR for the Parent Permission ABP Reg. Ref.: 312170-21 or their contemporary, has been engaged to assess the proposed amendments and to determine, in their professional opinion, whether the amendments materially impacted the findings of the original EIAR.

The full list of the qualified specialists engaged to assess the impact of the proposed amendment, as per the individual chapters of the EIAR for the parent permission is listed in Appendix A of this report. Details of the competency, qualifications and experience of the authors is also outlined in Appendix A.

REFERENCE LEGISLATION AND GUIDELINES

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

- Planning and Development Act 2000 (as amended) ('the 2000 Act');
- Planning and Development Regulations 2001 to 2023 ('the Planning and Development Regulations');
- Guidelines on Information to be Contained in an Environmental Impact Statement (EPA 2002).
- Study on the Assessment of Indirect & Cumulative Impacts as well as Impact Interaction (DG Environment 2002).
- Environmental Impact Assessment (EIA), Guidance for Consent Authorities Regarding Sub-Threshold Development (DoEHLG 2003).
- EIA Directive 85/337/EC (as amended by Council Directive 97/11/EC, Directive 2003/35/EC, Directive 2009/31/EC, Directive 2011/92/EU and Directive 2014/52/EU).
- European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) – transposed Directive 2014/52/EU into Irish law.
- Environmental Impact Assessment of Projects – Guidance on the Preparation of the Environmental Impact Assessment Report (European Commission 2017)
- Environmental Impact Assessment of Projects – Guidance on Screening (European Commission 2017)
- Environmental Impact Assessment of Projects – Guidance on Scoping (European Commission 2017)
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (Department of Housing, Planning and Local Government, 2018).
- Guidelines on the information to be contained in Environmental Impact Assessment Reports (EPA 2022)
- Environmental Impact Assessment Screening Practice Note 2021 (Office of the Planning Regulator)

SITE LOCATION & CONTEXT

The subject site is located within the metropolitan area of Dublin City which is identified for significant residential growth over the next two decades.

The proposed development seeks to amend the extant permission on the site under ABP-312170-21. As can be seen from the image below, work has commenced on site to implement this permitted development. Site establishment works were carried out including securing of perimeter hoardings, re-location of entrance gate to Gort Muire complex, Foul & surface water main drainage lines installed from Wyckham roundabout up to and throughout the site (under the supervision of Irish Water) and the excavation to formation levels of each block.

Works to date include commencement of permanent structural and civil items within building footprints. Foundations have commenced including being dug and poured in all blocks. Five tower cranes have been erected. The first-floor precast wall and floors have been installed on Block D and C. A significant portion of block B basement and podium has been formed and poured on site. Further works are occurring offsite including fabricating of prefabricated balconies and precast concrete wall and floor panels for blocks A,C, and D.



Figure 1 Image of wider site, with blocks A to D currently under construction



Figure 2 Image of wider site, with blocks A to D currently under construction

The site is located to the south and east of Gort Muire, Carmelite Order, Dundrum, Dublin 16 and is accessed off Wyckham Avenue, off Wyckham Way. St Tiernan's school is located to its immediate north. To the south and east of the site are mature, low density, two storey residential developments. The rear gardens of Parkvale and Wesley Lawns border this site. The lands fall from the southern boundary to the North East Corner with variations across the site of c. 10m.

It is c. 600m from the Ballinteer stores with its range of local shops and chemist. In addition to this neighbourhood centre, it is c.750m (10 minutes' walk) from the Dundrum Town Centre, with its wide range of shopping facilities, restaurants and services, 1.5km (15 minutes' walk) from SuperValu shopping centre, 1.4km from DLR Meadowbrook Leisure (14 minutes' walk) which has a gym, swimming pool, astro pitches.

The site is also within a 15 minute walk of Dundrum village centre which has a library, banks, and other services, which combined with the Dundrum town centre, results in a vibrant area which hosts many desirable residential and commercial amenities with multiple cafes, bars, restaurants, food retail and leisure facilities such as gyms. Beacon Hospital and the employment hub of Sandyford is just over 1km to the east.

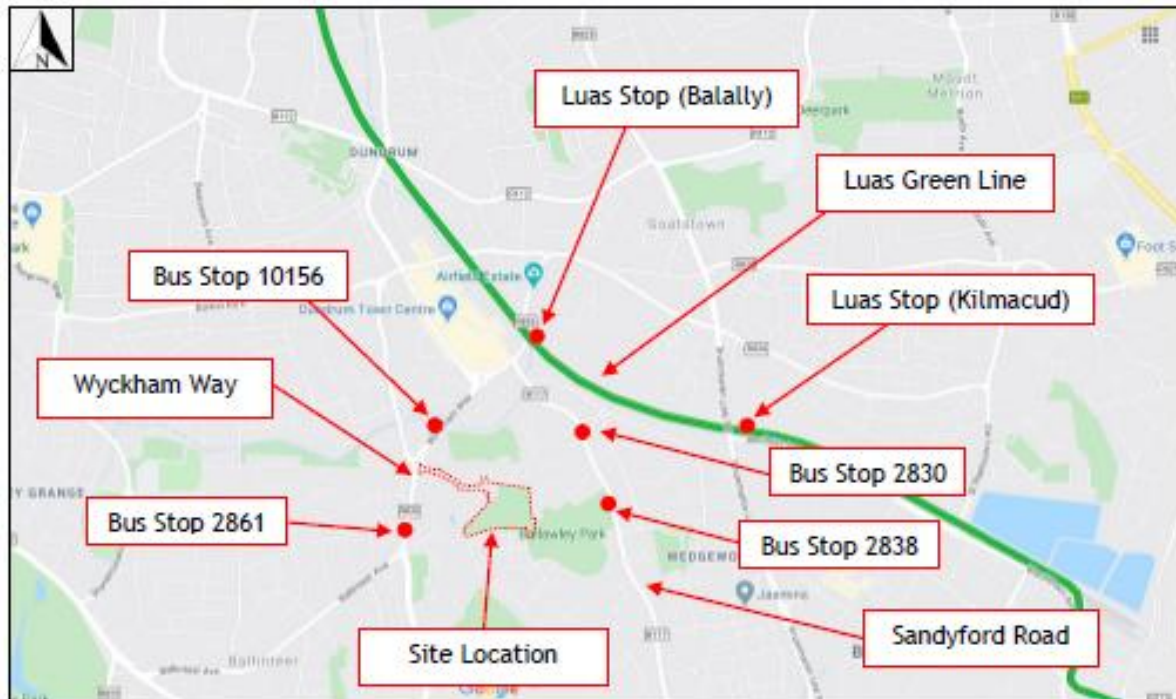


Figure 3 Site Location in proximity to public transport links

The site is well connected with public transport services. There are multiple bus routes within the vicinity as well as the being located c.750m from Ballaly Luas station and 1km from Kilmacud station on the Green Luas line.

Within the wider area, and within a 20-minute cycle of the site there are also a wide range of existing employment opportunities which can be reached by either public transport, foot or bicycle these including Nutgrove Shopping Centre and Enterprise Park, Stillorgan Business Park, Sandyford Business Park, Central Park Leopardstown, South County Business Park and University College Dublin. These areas include many large employers such as the Beacon Hospital, Microsoft and the university. All of these provide a wider range of existing employment opportunities to the future occupants of this development, in addition to the opportunities within Dundrum itself.

The surrounding area is generally residential or educational. It is well located with respect to primary and secondary schools. Secondary education centres St. Tiernan's community school and Wesley college will have direct pedestrian connection to the site. Ballinteer Secondary school, and St. Benildus college are also present at an accessible distance of the site. 8 Primary schools fall within the 5-minute drive time catchment of the site.

The parent permission also provides a direct connection between the public open space and the existing open space within Ballawaley Park, enlarging and enhancing the existing open space. Finally, Marley Park is within 2.4km of the site providing an additional wide range of outdoor recreation facilities.

DESCRIPTION OF PERMITTED AND PROPOSED AMENDMENTS

Development Permitted under ABP Reg. Ref.: 312170-21

This site has been the subject of several applications. However, as this is an amendment application only one permission is set out below.

ABP reg. ref.: 312170-21

Decision: ABP granted permission subject to conditions

Final Decision Date: 08/04/22

The proposed alterations/amendments to the residential development permitted under Reg Ref ABP 312170-21 are described as follows:

On behalf of the applicant, 1 Wyckham Land Limited, 27 Merrion Square North, Dublin 2, this planning report accompanies a planning application to An Bord Pleanála under Section 4 of the Planning and Development (Housing) and Residential Tenancies Act (2016) for a proposed Strategic Housing Development at 'Marmalade Lane', Gort Muire, Dundrum, Dublin 16 in accordance with the Planning and Development (Housing) and Residential Tenancies Act 2016.

The development will comprise a 'Build to Rent' (BTR) apartment development consisting of 5 no. blocks ranging in height up to 10 storeys (over basement/undercroft located in the northern portion of the site). 531 no. apartments are proposed comprising 28 no studio, 297 no. 1 -beds, 197 no. 2-beds & 9 no. 3-beds. All residential units provided with associated private balconies/terraces to the north/south/east/west elevations. The BTR development will also include Resident Support Facilities & Resident Services & Amenities (total floor area c.1488 sq.m) including reception lobby and residents lounge, meeting/leasing room, parcels/delivery area, event spaces, co-working spaces, resident store areas, outdoor cinema, screening room, 'chef's kitchen' and private dining area, prep kitchen, yoga studio, gym, changing room & WCs, pet washing, roof top garden allotment, management offices, maintenance office, store areas, staff breakroom and staff shower rooms. The development also includes a creche (c.438.6 sq.m), and a cafe unit (c.96.7 sq.m). Provision of 171 no. car parking spaces, 1,012 no. cycle parking spaces and 26 no. motorcycle spaces. Vehicular/pedestrian/cyclist accesses including from Wyckham Avenue and including improvement works to the existing Carmelite Centre access road and entrance. Additional pedestrian accesses from Ballawley Park and Greenmount Lane are also proposed. All associated site development works, open spaces, roof gardens, landscaping, boundary treatments, plant areas, waste management areas, cycle parking areas, and services provision (including ESB substations).

This is a proposed Build to Rent apartment development within Dundrum, on zoned Residential Lands and in close proximity to existing employment, community facilities, retail and public transport. As such, this is a high-quality development, in a highly sustainable location which accords with all of the National, Regional and Local Planning Policy.

A previous SHD permission on this site (Ref ABP- 308157-20) is noted. This current application is not proposed as an amendment to the previous permission but is a stand-alone planning application. However it does take into consideration the design and layout principles for the site established in the previous permission (as conditioned by ABP) and also provides for 5 no. apartment blocks laid out in a similar manner and also providing a significant quantum and quality of open space, whilst optimising connectivity and permeability to adjoining areas.

The key development statistics of the permitted development are set out below.

Development Proposal	Statistics
No. of apartments	531 no units in total: -28 no. Studios -297 no. 1 bed units -197 no. 2 bed units -9 no. 3 bed units
Public facilities	Creche (438.60 sqm) Café 96.70sqm
Residential facilities	Residential amenity space/ facilities c.1,488sqm
Site Area	Gross Site Area: 4.19 ha Net site area (minus public open space): 2.96 ha
Density	Gross Residential Density: 126.62 uph Net Residential Density: 179 uph
Plot Ratio	c.1.08 / (minus public open space) c.1.53
Site Coverage	15.52%
Building Height	Up to 10 storeys above undercroft and basement parking
Aspect	55% Single aspect 45% Dual aspect
Open Space	Public Open Space c.12,347 sqm Communal Open Space: c.6,977 sqm (incl. roof garden)
Carparking	171 no car parking spaces including: • 168 car spaces for residents and visitors • 3 no. creche spaces • 155 no. undercroft spaces (including 4 disabled spaces) • 28 no. car club spaces. • 11 no. of 171 spaces are disabled parking spaces
Cycle parking	1,012 no. bicycle spaces including: • 746 no long-term spaces & 266 no visitor cycle spaces
Motorcycle	26 no. motorcycle spaces
Vehicular Access	From Wyckham Avenue



Figure 4 Previously Permitted Site Layout Plan. Source: Reddy Architecture



Figure 5 Previously Permitted Block E. Source: Reddy Architecture

The proposed development:

The proposed development will amend the permitted Large-Scale Residential Development LRD Reg Ref ABP 312170-21. The amendment proposes to replace Block E, which provided 68 no. Apartments, with 8 no. 3 storey semi-detached houses comprising 3 / 4 bedrooms. This will result in an overall reduction in the number of units on site by c. 60 units.

The overall unit mix as a result of the proposed amendment will be as follows:

Unit Size	No. of Units	Percentage
Studio	25	5%
1 Bed	256	54%
2 Bed	173	37%
3 Bed / 4 bed	17	4%
Total	471	100%

The proposed density changes will reduce from 179 units per hectare to 159 units per hectare as per definition for density calculations set out in the recently published Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities 2023.

The proposed amendment will facilitate an overall increase in public open space provision and a reduction in height in this western part of the site. The proposed scale of the 8 no. semi-detached units in terms of height and massing are similar to the existing surrounding pitch roofed two storey residential units. Please refer to the drawings submitted as part of this application by Reddy Architecture for further information in relation to the proposed amendments.



Figure 6 Proposed aerial view of the development by Digital Dimensions



ENVIRONMENTAL IMPACT ASSESSMENT

Population and Human Health

The EIAR submitted with the parent application identified that the development is unlikely to result in any significant adverse impacts on human health and safety considerations once completed and operational. It confirmed that the project supports local employment and infrastructure. It also confirmed that there may be minor impacts during construction which would be mitigated through management plans.

The proposed amendments do not result in any additional, significant negative environmental effects or impacts compared with the EIAR for the original SHD proposal. Due to the reduced numbers of units proposed, down to 471 no. residential units, the population of this development will drop slightly from c.1,434 (531×2.7) to 1,272 (471×2.7).

It is also noted that because Block E is omitted from the development and replaced with 8 no. residential houses there will be an increased amount of open space which results in a better living environment for future occupants of the development, while also providing greater choice of unit types in this area.

The proposed amendments to Block E will not alter the established impact from the construction and operation of these houses because the houses are to be sited in the same location as Block E, with a reduced building height and footprint.

Overall, it is considered that there will be no additional negative impact on the overall population and human health of the proposed Marmalade Lane or on the wider area, and overall, there will be a slight positive impact compared to the original proposed development as detailed above.

Biodiversity.

The biodiversity chapter prepared as part of the EIAR submitted with the parent application assessed the development's impacts on local habitats. This proposed amendment to the EIAR has been assessed by Altamar Environmental Consultants.

The Biodiversity Chapter found that the development is located in an area of low to moderate ecological value and as such predicted to have a neutral imperceptible effect on biodiversity. Specific local mitigation measures include the avoidance of cutting of vegetation during the bird nesting season with regard to the construction phase. The survey found that there was no evidence of a current or past bat roost on site, therefore no significant negative impacts on these animals are expected to result from the proposed redevelopment. However, foraging activity within the area will be lost unless sufficient hedgerow planting is carried out. Overall, with the recommendations implemented any impacts to bats from the proposed development are considered to be negligible. Potential impacts will be reduced to a temporary, slight, negative impact at a local scale. Mammal assessments were carried out. Although badger activity was noted in the vicinity of the site, no badger activity was noted on site and no badger setts were noted in the vicinity of the proposed development. A series of wintering bird surveys were carried out. The site is not an important ex-situ for wintering birds.

The proposed amendment to the site layout seeks to increase open space and provide additional landscaping increasing the site's overall biodiversity gain. Therefore, the impact of the proposed amendment application is considered to have a positive impact to that of the parent permission, both at construction and operational stage.

Land, Soil and Geology

This chapter of the parent EIAR was undertaken to assess the impact of the proposed Marmalade Lane development on the surrounding soils, geology and groundwater environment. This proposed amendment to the EIAR has been assessed by DOBA Consulting Engineers.

The potential impacts and mitigation measure the construction and post development activities may have on soils, geology and groundwater were set out in the EIAR. In summary, there are no likely significant impacts predicted on the soils, geology and groundwater environment associated with the proposed development of the site.

The EIAR NTS confirmed during the Construction Phase the predicted impact on land, soil and geology at construction phase is limited to the excavations required to construct the foundations and install the proposed works. Much of these works are already commenced as a result of the parent permission. The proposed amendment application will not result in any additional adverse impacts.

During the operational phase as long as relevant impact mitigation measures are implemented, as set out in the original EIAR, the impact on the operational phase of this amendment would be limited. No significant effects are anticipated on land, soil, geology as a result of the proposed development, and no mitigation measures have been proposed, other than standard construction mitigation measures.

The proposed amendments, which will alter only one building (Block E), would not impact on the findings of the EIAR or the proposed mitigation measures. There will be no additional impacts on soils and geology because of the amendments, and no additional mitigation measures are proposed.

Hydrology and Water Services

This chapter of the EIAR was undertaken to assess the likely impact of the proposed development on the drainage and water supply material assets, as well as identifying proposed mitigation measures to minimise any impacts. Impact on the flood regime effected by the proposed development was also addressed in this chapter. This proposed amendment to the EIAR has been assessed by DOBA Consulting Engineers.

This chapter confirmed that there are no surface water courses on site. It also confirmed that appropriate measures will be implemented to manage runoff and prevent pollution ensuring no adverse impact on local rivers or water quality in the area.

The EIAR confirmed during the Construction Phase there are no predicted significant impacts arising from the construction phase due to the temporary nature of construction and the expected use of portable or temporary toilets only, which will be contracted out to an authorised disposal agent

With the proposed mitigation measures in place, no significant effects are anticipated on hydrology during the construction phase.

A Water Framework Directive Assessment (WFD) was completed for the development. The WFD Assessment considered the potential for impacts on WFD waterbodies. The assessment followed the sequential test and found that the development is at low risk of flooding and the development is deemed appropriate within the proposed site location.

The proposed amendments do not materially alter the impacts of the development of the hydrological environment. Consequently, there will be no additional impacts on water and hydrology of the

receiving environment as result of the amendments, and no additional mitigation or monitoring measures are required.

Material Assets

A desktop study was conducted in relation to the material assets associated with the proposed development and their capacities. Projections of the resources were made for the construction and operational phase of the development. During the construction phase the EIAR found that the impact of the permitted development may result in incurring loss or disturbance to material assets due to construction activities. It is unlikely that there will be any major impacts during the operation phase of the development. The EIAR confirmed that the potential residual impacts are as follows:

- In the Construction Phase a carefully planned approach to waste management and adherence to the C&D WMP during the construction phase will ensure that the impact on the environment will be short term, neutral and imperceptible.
- During the Operational Phase, a structured approach to waste management as set out in the EIAR chapter will promote resource efficiency and waste minimisation. Provided the mitigation measures are implemented and a high rate of reuse, recycling and recovery is achieved, the predicted impact of the operational phase on the environment will be long-term, neutral and imperceptible.

The proposed amendments, which will alter only one building (Block E), would not impact on the findings of the EIAR or the proposed mitigation measures. There will be no additional impacts on material assets because of the amendments, and no additional mitigation measures are proposed.

Traffic and Transportation

This chapter presents the likely and significant impacts associated with the Traffic & Transports associated with the proposed development. The purpose of this section is to assess the impact of the proposed development on the surrounding road network and transport infrastructure. This proposed amendment to the EIAR has been assessed by DOBA Consulting Engineers.

The Construction traffic travelling to the site will use the Wyckham Roundabout for access. Overall, there will be a negative short-term slight impact to local traffic during the construction phase. The traffic volume associated with the construction phase site is not considered to be excessive and will be spread out over the duration of the construction of the development. As the construction works are off-line and due to the designated access point which allows delivery vehicles to pull off into the site, there will be no significant disruption to the traffic flows on Wyckham Road as a result of the construction of the development. It is not envisaged that any diversions will be required. Existing public footpaths are unlikely to be impacted by the project as all works are proposed within the site boundaries.

At Operational Phase, there is likely to be a long-term imperceptible neutral impact on the surrounding roads as a result of the proposed development.

The proposed amendments, which will alter only one building (Block E) will reduce the unit numbers of the overall scheme, thereby reducing the population of the development and therefore the potential number of car trips generated. There will be a slightly positive impact on traffic and transport during the operational phase because of the amendments, and no additional mitigation measures are proposed.

Waste Management: Residual Effects

This section of the EIAR Addendum has been assessed by Traynor Environmental Consultants. A Construction and Demolition Waste Management Plan (CDWMP) was prepared for the construction phase of the development in advance of the commencement of the construction works. A separate Operational Waste & Recycling Management Plan (OWRMP) was also prepared for the operational phase of the development. As a result of these the impact on the environment of the permitted development was considered to be short-term, neutral and imperceptible.

The EIAR also provided mitigation measures for the operation phase which once implemented will result in a high rate of reuse, recycling and recovery. Therefore, the predicted impact of the operational phase of the permitted development on the environment will be long-term, neutral and imperceptible.

The proposed amendments, which will alter only one building (Block E), and which will reduce the population of the development, and therefore the operational waste generated, would not impact on the findings of the EIAR or the proposed mitigation measures. There will be no additional impacts on waste management because of the amendments, and no additional mitigation measures are proposed.

Noise and Vibration

This section of the EIAR and the Addendum were prepared by Traynor Environmental Ltd to identify and assess the potential noise impacts associated with the permitted development. During the construction phase of the project, it identified that there was the potential for significant and moderate impacts on nearby noise sensitive properties due to noise emissions from site activities. The application of binding noise limits, hours of operation, along with implementation of the mitigation measures identified, will ensure that noise and vibration impact will have a negative, moderate, and short-term impact on the surrounding environment.

In the Operational Phase there is a predicted additional vehicular traffic and mechanical plant and creche noise. The predicted change noise levels associated with additional traffic is predicted to be of imperceptible impact along the existing road network. In the context of the existing noise environment, the overall contribution of induced traffic is of neutral, imperceptible, and long-term impact to nearby residential locations.

Mechanical Plant & Creche Noise levels associated with operational plant are expected to be well within the adopted day and night-time noise limits at the nearest noise sensitive properties considering the site layout, the nature and type of units proposed and distances to nearest residences. Assuming that the worst-case operational noise levels do not exceed the adopted design goals with mitigation measures, the noise impact from this source will be of neutral, imperceptible, long-term impact. The potential impact and effects of each has been assessed and found to be not significant.

The proposed amendments will result in a development that is similar in quantum and extent and will not give rise to any significant additional impacts at construction or operational phases in relation to noise. It will not result in any material changes to any identified potential or significant impacts that require consideration of additional mitigation or monitoring measures.

Climate and Air Quality

This section of the EIAR and the Addendum were prepared by Traynor Environmental Ltd. The existing ambient air quality in the vicinity of the site has been characterised with information obtained from a number of sources including EPA Annual Air Quality in Ireland Reports and Local air monitoring stations data. The permitted development included mitigation measures. The impact of the proposed

amendments are similar to that of the permitted development and therefore no additional mitigation measures are required at either operational or construction phase.

Landscape and Visual Impact

A Landscape and Visual Impact Assessment (LVIA) chapter was prepared as part of the EIAR submitted with the parent application. The only views that will change are views 9, 12 and 14 which have been updated in line with the proposal. All of these views in the original SHD assessment were found to be either slight/ neutral or moderate/ neutral.



Location Map Montages

Maps are for Montage View location purposes only. Please refer to Architects drawings for accurate layout and red line.



As can be seen from the updated verified views the impact of these will be either similar or lessened as a result of this proposed alteration. The amended development would also retain the positive design impacts identified in the original assessment.

View 9 Existing	View 9 Permitted outlined in blue and proposed outlined in red
	
View 12 Existing	View 12 Permitted outlined in blue and proposed outlined in red



In conclusion, it is considered that the proposed amendments to the permitted development would result in a similar or positive townscape and visual impacts change during the operation phases compared to the original proposal, and no additional mitigation or monitoring measures are required.

Cultural Heritage: Archaeology

The chapter was completed by Moore Archaeological and Environmental Services Ltd and assessed the baseline archaeological, architectural and cultural heritage environment (hereafter referred to as cultural heritage environment or cultural heritage resource), to evaluate the potential or likely impacts that the proposed development will have on this environment and, where appropriate, to suggest mitigation measures to ameliorate potential impacts.

Given that the proposed amendments will retain buildings in a similar location but at a reduced scale, with reduced footprints, it is considered there will be no significant additional impacts at the construction or operational phases and will not result in any material changes to the Architectural or Cultural Heritage of the site or the setting of the protected structures on site. As a result, no additional mitigation or monitoring measures are required as a result of this proposed amendment.

Cultural Heritage: Architectural

Molloy & Associates Conservation Architects Ltd. were engaged to assess architectural heritage impacts arising from a now-permitted residential development at the subject site, to the north, east and south of a protected building range; the Gort Muire Centre, comprising a house, protected gardens and associated structures(Record of Protected Structures Ref.1453).

The originally submitted EIAR carried out an architectural heritage assessment of the site and its enclosing receiving environment, with the subject amendment application leaning on baseline assessments already executed, with reduced development consequentially presenting a lower risk for

the setting of the characterful protected building group to its west.

The proposed amendment development has inherently evolved from consideration of impacts for its receiving environment. Following a careful review, it is held that due to the reduced scale and massing of the proposal compared with the permitted Block E, there will be no significant additional impacts at either construction or operational phases for the protected structure or its garden setting.

The proposal will not result in any material change to baseline architectural heritage findings or consequentially identified potential or significant impacts that require consideration of additional mitigation or monitoring measures.

The amendment is considered an improvement to the permitted condition, where a less intensive use at the shared boundary, now culminated by rear gardens, is proposed. The setting of the protected structure and its garden is likely to remain largely unchanged with the modestly arranged dwellings providing a gentler backdrop to the southeast than was permitted. Established screening provided by verdant, mature boundaries will further minimise interaction between the setting of the protected structure and the proposed development. On the whole, the subject amendment development will in time, merge harmoniously with Gort Muire in its evolved urbanised condition as a house and garden enshrouded by a protected sylvan setting, within a developed townscape.

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

This includes information available on the environment including:

- (a) The expected residues and emissions and the production of waste, where relevant, and
- (b) The use of natural resources, in particular soil, land, water and biodiversity.

It is expected that there will be residues/emissions during the construction stage associated with the development works proposed as part of this amendment, which include ground preparation works, development of site infrastructure, construction of buildings and hardstanding areas and landscaping of the site including open soft landscaped areas. These are expected to be similar to the permitted scheme.

Standard mitigation measures are being employed and monitored as set out in the EIAR of the parent permission and as required by conditions in the grant of permission Reg Ref ABP 312170-21. As such residues and emissions are not considered likely to have potential to cause significant effects on the environment.

There will be some waste materials produced in the construction of the proposed scheme which will be disposed of using licensed waste disposal facilities and contractors. As is standard practice the scale of the waste production in conjunction with the use of licensed waste disposal facilities and contractors will not cause concern for likely significant effects on the environment. Again, this is set out in the parent permission which provided detail regarding the methodologies employed for the control, management, monitoring and disposal of waste from the site.

There will be no large-scale use of natural resources. The main use of natural resources will be land. The subject lands currently under construction for the permitted development under Reg Ref ABP 312170-21. This will not be altered as a result of this amendment application.

Other resources used will be construction materials which will be typical raw materials used in the construction of residential developments. The scale and quantity of the materials used will not be such that would cause concern in relation to significant effects on the environment and is similar to that of the permitted development. The construction or operation of the scheme would not use such a quantity of water to cause concern in relation to significant effects on the environment. The use of natural resources in relation to the proposed development is not likely to cause significant effects on the environment.

The proposed development for the purpose of this assessment relates only to Block E of the permitted development. The amendment will result in a reduction in height and scale to the permitted Block E. The proposed houses in terms of height and massing are similar to the existing surrounding residential units.

The potential impacts are assessed on the basis of the proposed amendment development, and cumulatively with the permitted development it is sought to amend. In this regard, any potential impact is considered unchanged due to the nature of the amendments, the limited impact it will have on the development as a whole and the similar scale and extent of buildings.

Compilation of The Above Information Taking Schedule 7 Criteria, As Appropriate, Into Account

Characteristics of Proposed Development	
The size of the proposed development.	The proposed development seeks to amend previously permitted development and relates to amendments to Block E. The proposal will - Remove apartments Block E, replacing it with 8 no. 3 storey semidetached units. - Reduce the storey height and footprint of the buildings. - Increase the public open space provision. These changes will impact the south western corner of the permitted site. The amendment will result in a reduced scale and massing in this location and providing a transition from the two storey housing surrounding the site to the taller apartment blocks. The remainder of the permitted development, including access points, Block A, B, C, D, will remain unchanged from the permitted development.
The culmination of other proposed development.	This site forms part of the Marmalade Lane Development as a whole. Cumulative impacts have been assessed on the basis of the proposed amendments alone, and cumulatively with the permitted development and other permitted developments in the area.
The nature of any associated demolition works	No demolition is proposed as part of the current application for amendments.
The use of natural resources, in particular land, soil, water and biodiversity.	As set out in the parent permission ABP Reg Ref (ABP Reg. Ref.: 312170-21) there is high quality landscaping and planting proposed throughout the site. The additional area of public open space which will be delivered as part of this amendment proposal will be similarly landscaped to a high standard, as indicated in the NMP Landscape pack. Appropriate attenuation and SuDs measures will be incorporated into the development. No adverse significant impacts are expected to occur on the site or in the vicinity of the site through the use of natural resources as a result of the proposed amendments alone.

The production of waste.	Construction waste produced will be controlled, stored, and disposed of in a sustainable manner as per relevant environmental guidance. This will be in line with that proposed in the permitted development. Operational waste for the residential development will be controlled by each household and dealt with by municipal services. No potential significant impacts are envisaged on the site or in the vicinity of the site because of the production of any waste associated with the proposed amendment application alone or cumulatively with the permitted development and other permitted development in the area.
Pollution and nuisances.	The construction phase will create short term negative impacts particularly in terms of dust and noise. These will be controlled in line with the EIAR mitigation measures and conditions placed on the parent permission (ABP Reg. Ref.:312170-21.)
The risk of major accidents, and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge	None.
The risks to human health (for example, due to water contamination or air pollution).	There is potential negative impact at construction stage in terms of noise and dust. However, these will be short term in duration and will be mitigated in accordance with the conditions imposed by the parent permission.

Location of Proposed Development	
The existing and approved land use.	Construction has commenced on site of the permitted development (ABP Reg. Ref.:312170-21). Permission is granted for residential use on this site. This development amends Block E only. These amendments result in omission of the apartment Block E and the provision of 8 no. housing units. The proposed amendments, as a result of omitting Block E will deliver 471 no. units. This is 60 less than the permitted development. The overall use, as permitted, will remain in residential use which is deemed an appropriate use for this land in accordance with the Development Plan.
The relative abundance, availability, quality, and regenerative capacity of natural resources (including soil, land, water, and biodiversity) in the area and its underground.	This is an allocated urban site and will deliver a high-density residential development appropriate to its location. The provision of significant quantities of well landscaped open spaces will be positive for the biodiversity of the area. The extensive use of SuDs will also support the water management of the development. The permitted and proposed attractive residential blocks in Marmalade Lane will provide an attractive urban frontage to the area. Overall, both the permitted development and the proposed amendments the subject of this application, will deliver the best and most efficient use of zoned land in a highly sustainable location.
The absorption capacity of the natural environment, paying particular attention to the following areas: (i) wetlands, riparian areas, river mouths; (ii) coastal zones and the marine environment; (iii) mountain and forest areas; (iv) nature reserves and parks; (v) areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive and;	The site itself is not located within a wetland, river mouth, coastal zone, marine environment, mountain, forest, nature reserve, or park. As identified in the parent permission, the site is surrounding by Protected Structures, including Gort Muire. The parent permission has been designed taking account of its setting. The proposed development will reduce the scale, height or

(vi) areas in which there has already been a failure to meet the environmental quality standards laid down in legislation of the European Union and relevant to the project, or in which it is considered that there is such a failure; (vii) densely populated areas; (viii) landscapes and sites of historical, cultural, or archaeological significance.	and character of block E only but the remainder of the development will remain as permitted. The permitted change to land use could affect the pattern of surface water run-off compared to the existing non-developed state. However, SUDS have been incorporated which ensures that the quantity and quality of the runoff will revert to a green field rate. The amendments to permitted units, the subject of this application, will not result in a significant change to that of the permitted parent permission other than increased the quantum of open space in this location. All mitigation measures will remain in place in accordance with the EIAR for the parent permission.
Types and characteristics of potential impacts	
The magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected).	It is expected that the proposed amendments, either alone or cumulatively with the permitted development, will not have any environmental impact beyond its immediate environs. All construction activities are be governed by the mitigation measures set out in the EIAR permitted under permitted development (ABP Reg. Ref.: -312170-21. These measures will be implemented as part of this proposed amendment application.
The nature of the impact.	The potential likely and significant impacts arising from the proposed amendment application will be similar or less than those of the permitted development. The impact of the construction of the parent permission will be typically those associated with a large-scale residential development in an area zoned for such use. The nature of the impacts is expected to be of a magnitude that would not be significant, adverse or permanent.

The transboundary nature of the impact.	The proposed amendments, either alone or cumulatively with the permitted development will not give rise to any impacts that are trans frontier or transboundary in nature.
The intensity and complexity of the impact.	The potential impacts associated with the proposed amendments, either alone or cumulatively with the permitted development, are not considered to be complex in nature or of a magnitude/ intensity/ scale to be of significance.
The probability of the impact.	It is probable that the minor impact of noise and pollution during the construction phase will occur; however, construction works on zoned lands within the area are not unexpected or out of character and working hours will be limited to hours set by the planning conditions.
The expected onset, duration, frequency, and reversibility of the impact.	The impacts identified would occur during the construction phase, there are no significant negative impacts which are considered likely to occur during the operational phase of the proposed residential development. The frequency of impacts will vary throughout the construction phase; however, the impact is still not considered to be significant. The minor impacts associated with the construction phase such as noise, dust and traffic will be temporary and will not lead to residual impacts.
The cumulation of the impact with the impact of other existing and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment.	The subject site is zoned land which permits residential development. It also has the benefit of a granted development on the subject site under (ABP Reg. Ref.: 312170-21) and which this application seeks to amend. The amendment of 1 of the 5 no. permitted blocks as proposed has been assessed both on the basis of the proposed amendments alone, and cumulatively with the permitted developments and other permitted development in the area. This has found that the overall the impact will be unchanged from the original EIAR.
The possibility of effectively reducing the impact.	Appropriate mitigations measures will be undertaken in accordance with the conditions of the permitted development (ABP Reg. Ref.: 312170-21 ameliorate effects on the environment arising from the proposed development. Any mitigations measures to manage noise, dust and/or pollution during the construction phase will be based on standard best practice, policies, and guidance.

CONCLUSION

This EIAR Addendum has assessed the potential environmental impacts arising the proposed amendment to the permitted development, which includes omitting the apartment Block E and replacing it with no. 8 three storey semi detached houses. The revised design remains consistent with the overall planning strategy and objectives of the original application, while responding to current housing demand.

The findings of this addendum confirm that the proposed modification will not result in any significant additional environmental effects beyond those already identified in the parent EIAR. In several respects, such as population density and construction intensity, the change is anticipated to reduce or maintain impact levels compared to the original proposal. All relevant environmental disciplines have been considered, and no new or unmitigated significant effects have been identified.

Accordingly, the amendment is considered environmentally acceptable, and the EIAR, as supplemented by this addendum, continues to provide a robust and comprehensive assessment of the project as revised.

APPENDIX A

A full list of the qualified specialists engaged to prepare an assessment of the EIAR Addendum following on from the parent permission, along with details of the competency, qualifications and experience of the authors is in the table below:

Chapter	Consultancy	Lead Consultant	Qualifications
Introduction & Methodology	McGill Planning	Trevor Sadler	Master of Regional & Urban Planning, MIPI
Alternatives			
Description of Development			
Population & Human Health			
Interactions			
Summary of Mitigations Measure			
Biodiversity	Altamar	Bryan Deegan	MSc in Environmental Science, BSc (Hons.) in Applied Marine Biology, NCEA National Diploma in Applied Aquatic Science and a NCEA National Certificate in Science (Aquaculture).
Land and soils, geology and hydrogeology, Material Assests	DOBA	Paul Doyle	Chartered Engineer and a Fellow of the Association of Consulting Engineers of Ireland
Hydrology			
Water Services	DOBA	Paul Doyle	
Traffic & Transportation	DOBA	Paul Doyle	
Noise and Vibration	Traynor Environmental	Nevin Traynor	BSc. Env, H.Dip I.T, Cert SHWW
Waste Management	Traynor Environmental	Nevin Traynor	BSc. Env, H.Dip I.T, Cert SHWW
Air Quality and Climate	Traynor Environmental	Nevin Traynor	BSc. Env, H.Dip I.T, Cert SHWW
Landscape & Visual Assessment	McGill Planning Ltd	Trevor Sadler	Master of Regional & Urban Planning, MIPI
Cultural Heritage: Archaeology	Moore Group	Declan Moore	B. Arch and licenced archaeologist with over 20 years' experience.
Cultural Heritage: Architecture	Molloy & Associates	Maol Íosa Molloy	BArch., BScArch., MUBC, DipArb., MRIAI, RIBA,