# Proposed Amendments to Permitted Development at the Royal Liver Retail Park, Dublin 12

## Screening for the Requirement for Environmental Impact Assessment

Brady Shipman Martin

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# Environmental Assessment **Built Environment**

02Client: **Land Development Agency**

Date: **22 September 2026**

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# 1 Introduction

## 1.1 Overview

Brady Shipman Martin (BSM) has been commissioned by the applicant, the Land Development Agency (LDA), to carry out a screening for the requirement for Environmental Impact Assessment (EIA) for development consisting of amendments to the development permitted under DCC Reg. Ref.: 4238/19; ABP Ref. PL29S.307804; as amended by DCC Reg. Ref.:4436/23; and amendments proposed under DCC Reg. Ref.: 5050/26, submitted to DCC in February 2026 on the former Royal Liver Assurance Retail Park, Old Naas Road, Dublin 12.

Since receiving permission for redevelopment the site has been acquired by the LDA, which identified the potential of the site to deliver a significant number of new social and affordable homes within an area of high demand which is well served by local services and excellent public transport links. The proposed amendments to the permitted scheme are required in order to align the scheme with the remit and objectives of the LDA.

## 1.2 Purpose of this Report

The purpose of this report is to provide information to the competent planning authority (Dublin City Council) to carry out the screening for the requirement for EIA for the proposed amendments.

## 1.3 Legislation and Guidance

The EIA Directive (Directive 85/337/EEC) came into force in 1985. The Directive was amended in 1997, 2003 and 2009, subsequently codified by Directive 2011/92/EU, and amended by Directive 2014/52/EU (the EIA Directive). The EIA Directive is transposed into Irish legislation by the Planning and Development Act 2000, as amended (PDA 2000), by the Planning and Development Regulations 2001, as amended (PDR 2001) and the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018).

The EIA Directive has the stated objective "*to ensure a high level of protection of the environment and of human health, through the establishment of minimum requirements for the environmental impact assessment of projects*"[1].

This screening report has had regard to the following legislation and guidelines:

- The EIA Directive on the assessment of the effects of certain public and private projects on the environment.
- Department of Housing, Planning and Local Government (DoHPLG, 2018). *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment.*
- Environmental Protection Agency (EPA, 2022). *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports.*
- European Commission (EC, 2017). *Environmental Impact Assessment of Projects – Guidance on Screening.*

[1] Section 41 Directive 2014/52/EU

- Office of the Planning Regulator (OPR, 2021). *OPR Practice Note PN02: Environmental Impact Assessment Screening.*

## 1.4 Qualifications

This document has been prepared by Jade Schanen, Environmental Consultant at Brady Shipman Martin. She holds of BA (Mod.) in Environmental Science from Trinity College Dublin. She is a graduate member of the Charactered Institution of Water and Environmental Management. Jade has been working professionally in the field for the last two years and has experience preparing EIA and AA screening reports.

The screening report has been reviewed by Thomas Burns a Partner, Landscape Architect and Environmental Planner with Brady Shipman Martin. Thomas has a B.Agr.Sc. (Landscape) degree and a post-graduate Diploma in Environmental Impact Assessment Management from University College Dublin, and an Advanced Diploma in Planning and Environmental Law from King's Inn. Thomas has over 30 years' experience in EIA and is a member of the Irish Landscape Institute and the Irish Environmental Law Association.

# 2 The Site and the Permitted Development

## 2.1 The Site

The site comprises the former Royal Liver Assurance Park, Old Naas Road, Dublin 12. The site is bounded by Naas Road to the south, Kylemore Road to the west, Old Naas Road to the north and the 'Brooks' Building Providers to the east. The site has an overall area of c.3.6 hectares (refer to **Figure 2.1**).

The previous retail and other occupiers have vacated the Retail Park, and the site is currently not in use, in preparation for commencement of development of the permitted scheme.

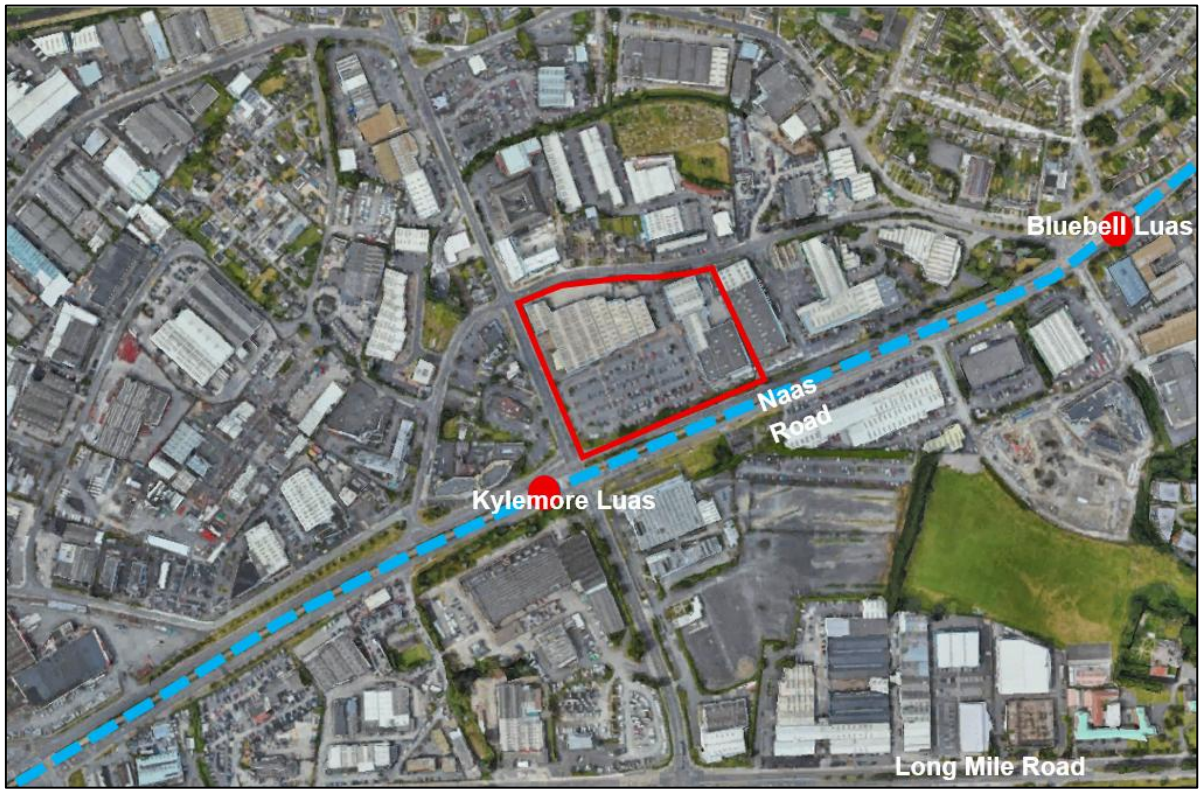



**Figure 2.1: Site context – Full details of the Red Line are contained in documentation that accompanies the planning application**

The subject site is zoned '***Z14*** *Strategic Development and Regeneration Areas (SDRAs)*' where the objective is:

> '*To seek the social, economic and physical development and/or regeneration of an area with mixed use, of which residential would be the predominant use'.*

The development further states that:

> *'These are areas where proposals for substantial, comprehensive development or redevelopment have been, or are in the process of being, prepared. [….] Z14 areas are capable of accommodating significant mixed-use development, of which residential would be the predominant use.*'

The primary uses supported in this zone are residential, community facility, cultural and student accommodation, with ancillary uses also facilitated where they deliver on the overall zoning objective.

The site forms part of the **Naas Road SDRA 5**, a 52ha regeneration zone, which sets out guiding principles for development along the Naas Road as part of the future City Edge project. The key vision of the regeneration is to create sustainable successful communities.

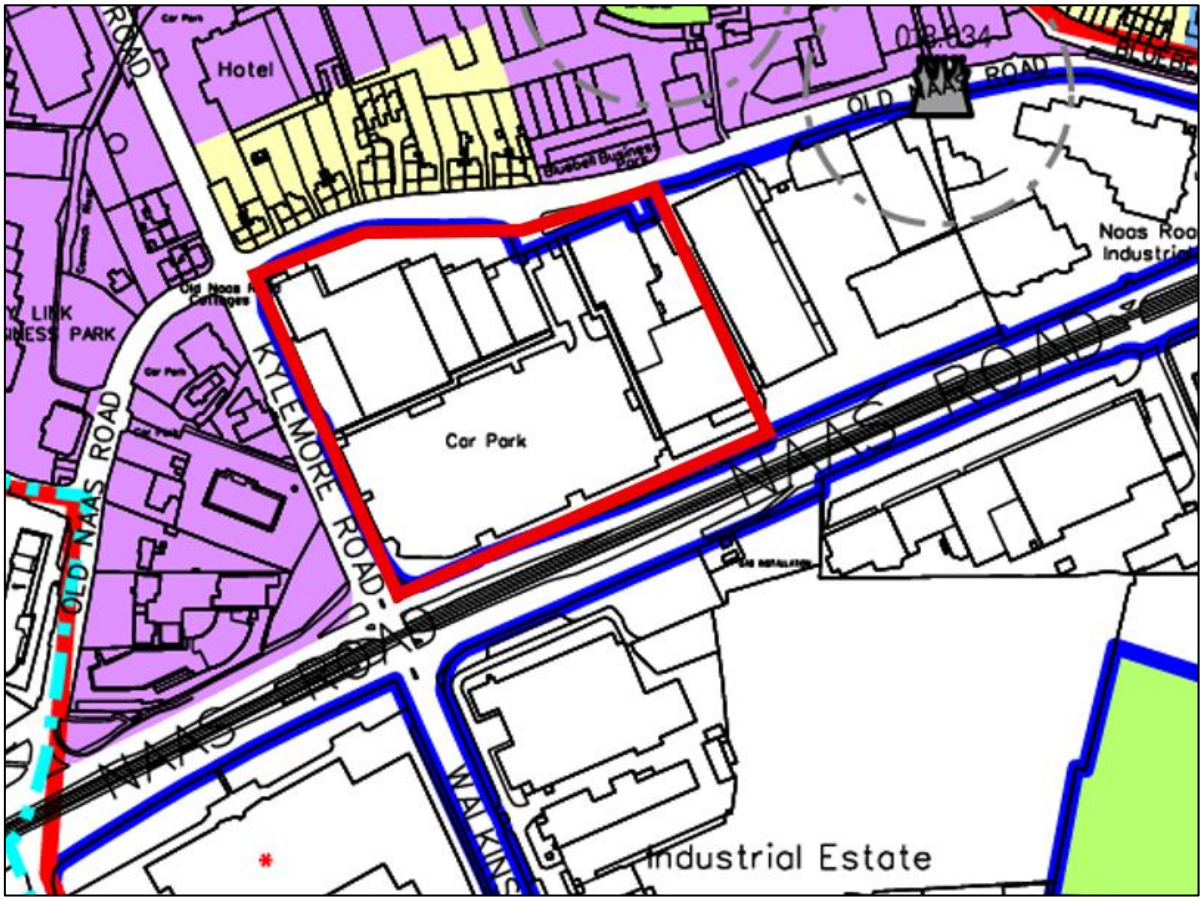



**Figure 2.2 Land Use Zoning (Dublin City Development Plan 2022-2028)**

## 2.2 The Permitted Development

### 2.2.1 The Parent Permission (DCC Reg. Ref. 4238/19; ABP Ref.: 307804-20)

Planning permission (for a period of 10 years) was granted by An Bord Pleanála[2] in November 2020 for the redevelopment of the Royal Liver Assurance Retail Park to provide a mixed-use development (comprising residential, office, crèche, community, retail, café /bar/restaurant, medical centre, pharmacy uses) and all ancillary works; comprising 9 no. buildings ranging in height from 7 to 18 storeys over basement level, with a total GFA of c.129,210m2 , plus c. 31,413m2 relating to ancillary car parking, bicycle parking, plant, waste storage facilities, storage, services, including at ground (sub-podium) and basement levels (the Permitted Scheme) (refer to **Figure 2.3**).

[2] Now An Coimisiún Pleanála




**Figure 2.3 Parent Permitted Development**

### 2.2.2 The Amendment Applications (DCC Reg. Ref. 4436/23 and DCC Reg. Ref.5050/26)

Amendments to the Permitted Scheme were granted under DCC Reg. Ref. 4436/23 in February 2024. The amendments consisted of changes to the plans such that the parking is allocated on a proportional basis for each Phase. The amendment application included removal of the basement under Phase 1 (Blocks E1, E2, F1 & F2), retention of the podium parking in support of that phase, and inclusion of a new basement car park under Blocks B1 & B2.

Following the LDA purchase of the Royal Liver site in 2025, a full review of the Permitted Scheme was carried out, and some areas of necessary change were identified. An amendment application for Phase 1 was granted in August 2026 (DCC Reg. Ref.: 5050/26) that included the removal of the co-living housing type to provide additional standard apartments in Block E1, reducing basement areas and re-ordering of development phasing to improve viability and constructability.

## 2.3 EIA and the Permitted Development

### 2.3.1 The Parent Permission and EIA

An Environmental Impact Assessment report (EIAR) was submitted with the application for the Permitted Scheme, and the Permitted Scheme was subject to Environmental Impact Assessment.

It is noted that in carrying out the EIA, the Inspector of An Bord Pleanála (now An Coimisiún Pleanála) made the following **Reasoned Conclusion on the Significant Effects**:

"*Having regard to the examination of environmental information set out above, to the EIAR and other information provided by the developer, and to the submissions from the planning authority, prescribed bodies and members of the public in the course of the application, it is considered that the main significant direct and indirect effects of the proposed development on the environment are as follows:*

- *Significant direct positive effects with regard to population, land and material assets arising from the additional housing that would be provided on the site;*
- *Potential effects on air quality and from noise during construction which will be mitigated by appropriate monitoring and management measures.*

*The proposed development is not likely to have significant effects on human health, biodiversity, soil, water, climate, cultural heritage or the landscape. The likely significant environmental effects arising as a consequence of the proposed development have therefore been satisfactorily identified, described and assessed. They would not require or justify refusing permission for the proposed development or the making of substantial alterations to it.*"

(Sub-section 8.14 of the ABP Inspector's Report)

### 2.3.2 Previous Amendments Permission and Screening for EIA

A previous application for amendments DCC Reg. Ref.:4436/23 was accompanied by a Screening for EIA. In determining the requirement for EIA for the proposed amendments in that application, the Planning Authority stated:

*"An Environmental impact Assessment Report (EIAR) was submitted with the extant planning permission DCC Reg Ref: 4238/19. The proposed development is for the relocation and reconfiguration of part basement car parking, reduction is car parking provision and the number of residential units. Overall, the proposal represents a reduction in floor space from 129,210 sq m to 128,736 sq m (- 474 sq m).*

*It is considered that the proposal would not trigger another mandatory EIAR nor would it give rise to a sub-threshold environmental impact assessment. The development will be carried out in accordance with the conditions of the parent planning permission and normal building practices in order to mitigate against any adverse impacts.*

*Having regard to conclusion of the Environmental Impact Assessment Report, the monitoring measures as set out within the conditions attached to DCC Reg. Ref: 4238/19, the Planning Authority is satisfied that the proposed development will not have any significant impacts on the environment.*"

(EIAR Section of the DCC Planner's Report)

The further amendment application submitted in February 2026 (DCC Ref: 5050/26) was also accompanied by a Screening for EIA. The conclusion of this screening report determined that:

*"It is considered that the proposed amendments will not have significant effects on the environment and therefore can be screened out for the requirement for EIA. The main reasons for this conclusion having regard to the full extent of the permitted development, as amended, are as follows:*

- *The proposed amendments on its own falls below the thresholds at or above which there is a requirement for EIA;*
- *There is no change to the development footprint or to the site area;*
- *A 203no. unit shared accommodation block (Block E1) will be replaced with a 98no. unit residential apartment block – and as such there is no increase in residential units.*
- *No demolition are proposed or required;*
- *The permitted development and proposed amendments remain consistent with the land use planning objectives for the area;*
- *The permitted development and proposed amendments remain consistent with the on-going emerging nature of the surrounding area;*
- *The proposed amendments will not give rise to any significant environmental effects.*

*The proposed amendments have been assessed in accordance with the requirements of the EIA Directive and the national legislation transposing same – specifically the Planning and Development Act 2000, as amended, and the Planning and Development Regulations 2001, as amended, with reference to Articles 44A, 44B, 44D and 44E and Part 1 and Part 2 of Schedule 5 and the requirements of Schedules 7A and 7 of Planning and Development Regulations 2001, as amended.*

*Based on the assessment carried out, it can be concluded that the application for the proposed amendment will not have significant effects on the environment either during the construction phase or operational phase of the development. Therefore, having regard to the nature, scale and location of the subject site, there is no real likelihood of significant effects on the environment arising from the proposed amendment, an Environmental Impact Assessment (EIA) and the preparation of an Environmental Impact Assessment Report (EIAR) is not required."*

# 3 The Proposed Development

## 3.1 Need and Rationale for the Proposed Amendments

The LDA acquired the Royal Liver site in 2025, and a full review of the Permitted Scheme and subsequent amendments was conducted. Areas of change were identified and addressed in respect of Phase 1 in February 2026 amendment application, DCC Reg. Ref. 5050/26. The amendments proposed in this application will further align Phase 2 of the scheme with the LDA objectives and efficiencies.

## 3.2 Key Changes and Amendments to the Permitted Development

The key changes include for:

- The proposed alterations result in an overall increase of 2 no. units increasing the total overall units from 1196 to 1198. The proposed amended residential development of Block B1, B2, C1, C2, D1 & D2 will consist of a total of 635 no. residential apartments (an increase from 633 no. as permitted), which includes 38 No. Studios, 269 No. 1-Bed, 288 No. 2-Bed- 4-Person and 40 No. 3-Bed- 5-Person, units as follows:
  - Alteration of Block B1 from a permitted 11-12-storey building providing for 90 no. apartment units to a 10-storey building providing for 107 no. apartments.
  - Alteration of Block B2 from a permitted 10 storey building providing for 90 no. apartment units to a 10-storey building providing for 89 no. apartments.
  - Alteration of Block C1 from a permitted 10-storey building providing for 171 no. apartment units to a 10-storey building providing for 144 no. apartments.
  - Alteration of Block C2 from a permitted 10-storey building providing for 89 no. apartment units to a 10-storey building providing for 98 no. apartments.
  - Alteration of Block D1 from a permitted 9-storey building providing for 87 no. apartment units to a 9-storey building providing for 123 no. apartments.
  - Alteration of Block D2 from a permitted 8-storey building providing for 106 no. apartment units to an 8-storey building providing for 74 no. apartments.
- The reconfiguration of internal layouts of each of the blocks has resulted in the minor shift in the block footprints. The permitted podium between Block B2 and Block C1 is removed with additional public realm and connection to the south proposed. The block amendments result in amendments to permitted communal amenity space with the removal of roof terraces on Blocks C1, C2 and D1 and amendment to roof terraces on Block B1 and B2.
- Façade modifications are proposed to respond to the revised internal layouts including minor relocation of windows, balconies etc. and a revised approach to the Naas Rd frontage.
- Alteration of the permitted uses and facade at ground floor level and removal of permitted BTR tenant amenity spaces located in Blocks B1, B2, C1 & C2 to provide for a ground floor level that includes:
  - Blocks B1-B2: 1 no. retail/café/restaurant unit, 1 no. café unit, 1 no. community unit, a creche (relocated from Block D1) and associated cycle parking, plant areas and entrances.

- □ Block C1-C2-D1-D2: 1 no. retail unit, 2 no. retail/cafe/restaurant units, own door residential units, undercroft parking and associated cycle parking, plant areas and entrances.

- Alterations to the permitted undercroft and basement parking areas under Blocks B1, B2, C1, C2, D1 & D2 to include for alterations to permitted layouts of car parking, cycle parking, plant, waste stores and substation locations.
- Amendment of Condition 3 (a) of the parent permission (DCC Reg. Ref.: 4238/19; ABP Ref. PL29S.307804) relating to the Build to Rent (BTR) covenant, and its removal as it relates to Blocks B1, B2, C1, C2 & D1.

# 4 Screening for the Requirement for EIA

## 4.1 The Permitted Development and the Requirement for EIA

As noted in Section 2.3 of this report, an EIAR was submitted with the application for the parent permission (DCC Reg. Ref.: 4238/19; ABP Ref. PL29S.307804) and the Permitted Scheme was subject to EIA. The requirement for EIA was screened out for the amendment applications (DCC Reg. Refs.:4436/23 and 5050/26).

## 4.2 The Proposed Amendments and the Requirement for EIA

As the proposed development consists of amendments to a previously permitted development, the proposed development is not of a class listed in Part 1 of Schedule 5 of PDR 2001 and does not meet or exceed a threshold in Part 2 of Schedule 5 of the PDR 2001.

Therefore, EIA is not a mandatory requirement for the proposed amendments.

'Sub-threshold development' refers to development being of a class listed in Part 2 of Schedule 5 that is below a stated threshold. These developments are subject to screening for the requirement for 'Sub-threshold EIA'.

The proposed development consists of an amendment to a previously permitted development and does not change the nature of the permitted development or the area of the site or the development footprint. The proposed amendments will replace the unit mix across Block B1, B2, C1, C2, D1 and D2, adding a total of 2 units overall.

Given that there is no increase in site / development area and the permitted unit number is already in excess of 500, the proposed amendments to the Permitted Scheme does not come within '*Infrastructure projects*' Type of Part 2 of Schedule 5:

- *10(b)(i) Construction of more than 500 dwelling units;*

  *or*

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

As an amendment to a permitted development the requirement for EIA under Class 13 of Part 2 of Schedule 5 must also be considered:

*13. Changes, extensions, development and testing:*

*(a) Any change or extension of development already authorised, executed or in the process of being executed (not being a change or extension referred to in Part 1) which would:-*

*(i) result in the development being of a class listed in Part 1 or paragraphs 1 to 12 of Part 2 of this Schedule, and*

*(ii) result in an increase in size greater than –*

- *25 per cent, or*
- *an amount equal to 50 per cent of the appropriate threshold,*

*whichever is the greater.*

However, as previously noted the proposed amendments relate to the Permitted Scheme and does not change the nature of the permitted development or the area of the site or the development footprint. The proposed amendments will increase the total units by 2. no, from 633 units to 635 overall in Phase 2. Other amendments relate to the layout and mix of units within the permitted massing and footprint and with an overall reduced height of development. The development will be carried out with any conditions attached to the amendment permission as well as the parent permission.

Therefore, there is no requirement for EIA under Class 13(a) of Part 2 of Schedule 5.

Likewise no demolition works are required for the proposed amendments and as such Class 14: Demolition of Part 2 of Schedule 5 does not apply.

### 4.2.1 Conclusion

Having regard to the above, it is considered that the proposal would not trigger mandatory EIAR, nor would it give rise to a sub-threshold environmental impact assessment.

## 4.3 Provision of Information as Required of Schedule 7A of the PDR 2001

While it is considered that there is no requirement for EIA, the information required of the applicant (*i.e.* Schedule 7A of PDR 2001) for the purposes of assisting the competent authority in making such a determination (having regard to the criteria in Schedule 7 of PDR 2001) is provided in the following sections.

Schedule 7A of the PDR 2001 sets out the information to be provided by the applicant for the purposes of screening sub-threshold development for an EIA.

Schedule 7 of the PDR 2001 sets out the criteria for determining (by the competent authority) whether development listed in Part 2 of Schedule 5 should be subject to an EIA.

The response to the information to be provided as set out in Schedule 7A of the PDR 2001 is detailed in **Table 4.1** below.

**Table 4.1: Provision of Information as required from Schedule 7A of PDR 2001**

| | |
|---|---|
| **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** |
| *The development will consist of amendments to a previously permitted mixed-use development (DCC Reg. Ref.: 4238/19; ABP Ref. PL29S.307804, as amended by DCC Ref.:4436/23 and under current application DCC Reg. Ref.: 5050/26). The proposed amendments relate solely to the permitted Blocks B1, B2, C1, C2, D1 and D2 (identified as Phase 2). No amendments are proposed to any other permitted blocks.*<br><br>*1. The proposed alterations result in an overall increase of 2 no. units increasing the total overall units from 1196 to 1198. The proposed amended residential development of Block B1, B2, C1, C2, D1 & D2 will consist of a total of 635 no. residential apartments (an increase from 633 no. as permitted), which includes 38 No. Studios, 269 No. 1-Bed, 288 No. 2-Bed- 4-Person and 40 No. 3-Bed- 5-Person, units as follows:* | |

- *Alteration of Block B1 from a permitted 11-12-storey building providing for 90 no. apartment units to a 10-storey building providing for 107 no. apartments.*
- *Alteration of Block B2 from a permitted 10 storey building providing for 90 no. apartment units to a 10-storey building providing for 89 no. apartments.*
- *Alteration of Block C1 from a permitted 10-storey building providing for 171 no. apartment units to a 10-storey building providing for 144 no. apartments.*
- *Alteration of Block C2 from a permitted 10-storey building providing for 89 no. apartment units to a 10-storey building providing for 98 no. apartments.*
- *Alteration of Block D1 from a permitted 9-storey building providing for 87 no. apartment units to a 9-storey building providing for 123 no. apartments.*
- *Alteration of Block D2 from a permitted 8-storey building providing for 106 no. apartment units to an 8-storey building providing for 74 no. apartments.*

2. *The reconfiguration of internal layouts of each of the blocks has resulted in the minor shift in the block footprints. The permitted podium between Block B2 and Block C1 is removed with additional public realm and connection to the south proposed. The block amendments result in amendments to permitted communal amenity space with the removal of roof terraces on Blocks C1, C2 and D1 and amendment to roof terraces on Block B1 and B2.*
3. *Façade modifications are proposed to respond to the revised internal layouts including minor relocation of windows, balconies etc. and a revised approach to the Naas Rd frontage.*
4. *Alteration of the permitted uses and facade at ground floor level and removal of permitted BTR tenant amenity spaces located in Blocks B1, B2, C1 & C2 to provide for a ground floor level that includes:*
   - *Blocks B1-B2: 1 no. retail/café/restaurant unit, 1 no. café unit, 1 no. community unit, a creche (relocated from Block D1) and associated cycle parking, plant areas and entrances.*
   - *Block C1-C2-D1-D2: 1 no. retail unit, 2 no. retail/cafe/restaurant units, own door residential units, undercroft parking and associated cycle parking, plant areas and entrances.*
5. *Alterations to the permitted undercroft and basement parking areas under Blocks B1, B2, C1, C2, D1 & D2 to include for alterations to permitted layouts of car parking, cycle parking, plant, waste stores and substation locations.*
6. *Amendment of Condition 3 (a) of the parent permission (DCC Reg. Ref.: 4238/19; ABP Ref. PL29S.307804) relating to the Build to Rent (BTR) covenant, and its removal as it relates to Blocks B1, B2, C1, C2 & D1.*

*No demolition works are required to facilitate the proposed amendments.*

**(b) a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected**

The site comprises the former Royal Liver Assurance Park, Old Naas Road, Dublin 12. The site is bounded by Naas Road to the south, Kylemore Road to the west, Old Naas Road to the north and the 'Brooks' Building Providers to the east (refer to **Figure 2.1**).

The previous retail and other occupiers have vacated the Retail Park, and the site is currently not in use, in preparation for commencement of development of the Permitted Scheme (as amended).

The subject site is located within the Naas Road SDRA (SDRA 5) and is zoned '***Z14*** *Strategic Development and Regeneration Areas (SDRAs)*' where the objective is:

| |
|---|
| '*To seek the social, economic and physical development and/or regeneration of an area with mixed use, of which residential would be the predominant use'.*<br><br>The proposed amendment relates to a permitted development and does not change the nature of the permitted development or the area of the site or the development footprint. The proposed alterations result in an overall increase of 2 no. units increasing the total overall units from 1196 (as currently proposed under DCC Reg. Ref.: 5050/26) to 1198. The proposed amended residential development of Block B1, B2, C1, C2, D1 and D2 will consist of a total of 635 no. residential apartments (an increase from 633 no. as permitted).<br><br>The proposed amendments will not give rise to any effects as a result of the location of the proposed development. |
| **2. A description of the aspects of the environment likely to be significantly affected by the proposed development.** |
| The proposed amendment relates to a permitted development and does not change the nature of the permitted development or the area of the site or the development footprint. The proposed alterations result in an overall increase of 2 no. units increasing the total overall units from 1196 (as currently proposed under DCC Reg. Ref.: 5050/26) to 1198. The proposed amended residential development of Block B1, B2, C1, C2, D1 and D2 will consist of a total of 635 no. residential apartments (an increase from 633 no. as permitted).<br><br>The proposed amendments will not give rise to any change aspects of the environment or to likely significant effects. |
| **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—**<br><br>**(a) the expected residues and emissions and the production of waste, where relevant** |
| The proposed amendment relates to a permitted development and does not change the nature of the permitted development or the area of the site or the development footprint. The proposed alterations result in an overall increase of 2 no. units increasing the total overall units from 1196 (as currently proposed under DCC Reg. Ref.: 5050/26) to 1198. The proposed amended residential development of Block B1, B2, C1, C2, D1 and D2 will consist of a total of 635 no. residential apartments (an increase from 633 no. as permitted).<br><br>The proposed amendments will not give rise to any change in expected residues or in the production of waste. |
| **(b) the use of natural resources, in particular soil, land, water and biodiversity** |
| The proposed amendment relates to a permitted development and does not change the nature of the permitted development or the area of the site or the development footprint. The proposed alterations result in an overall increase of 2 no. units increasing the total overall units from 1196 (as currently proposed under DCC Reg. Ref.: 5050/26) to 1198. The proposed amended residential development of Block B1, B2, C1, C2, D1 and D2 will consist of a total of 635 no. residential apartments (an increase from 633 no. as permitted).<br><br>The proposed amendments will not give rise to any appreciable change in the use of natural resources, including soil, land, water or biodiversity. |
| **4. The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7** |
| The information provided above has taken account of the criteria in Schedule 7. |

## 4.4 Other Considerations and Assessments relating to the Proposed Development

### 4.4.1 Screening of the Proposed Amendments for requirement for Appropriate Assessment

The parent application and the previous amendment applications were subject to screening for the requirement for AA and Stage 2 Appropriate Assessment and the preparation of a Natura Impact Statement (NIS) was not required.

This amendment application is also subject to screening for the requirement for AA. The AA screening report has concluded that, in view of best scientific knowledge, the proposed amendments to the development permitted by An Coimisiún Pleanála at Royal Liver Retail Park, Dublin 12, individually or in combination with another plan or project, will not have a significant effect on any European sites. This conclusion was reached without considering or taking into account mitigation measures or measures intended to avoid or reduce any impact on European sites.

### 4.4.2 Directive 2001/42/EC SEA Directive

The lands are zoned Z14 within the adopted Dublin City Development Plan 2022-2028, which was subject to Strategic Environmental Assessment (SEA) which was supported by an Environmental Report and SEA Statement.

### 4.4.3 Directive 92/43/EEC Habitats Directive

The lands are zoned Z14 within the adopted Dublin City Development Plan 2022-2028, which was subject to screening for appropriate assessment and to the preparation of a Natura Impact Report.

The proposed amendments will be subject to screening for the requirement for AA. The AA screening report has concluded that, in view of best scientific knowledge, the proposed amendments to the development permitted by An Coimisiún Pleanála at Royal Liver Retail Park, Dublin 12, individually or in combination with another plan or project, will not have a significant effect on any European sites. This conclusion was reached without considering or taking into account mitigation measures or measures intended to avoid or reduce any impact on European sites.

### 4.4.4 Directive 2007/60/EC Assessment and Management of Floods

There is no change to the nature of development or to the development footprint of the permitted development. No impact on flooding arises as a result of the proposed amendments the subject of this application.

### 4.4.5 Directive 2000/60/EC Water Framework Directive

There is no change to the nature of development or to the development footprint of the permitted development. No WFD impacts will occur as a result of the proposed amendments the subject of this application.

### 4.4.6 Directive 2002/49/EC Environmental Noise Directive

There is no change to the nature of development or to the development footprint of the permitted development. No Environmental Noise Directive impacts will occur as a result of the proposed amendments the subject of this application.

### 4.4.7 Directive 2008/50/EC Ambient Air Quality and Cleaner Air for Europe (CAFE Directive)

There is no change to the nature of development or to the development footprint of the permitted development. No Ambient Air Quality and Cleaner Air for Europe impacts will occur as a result of the proposed amendments the subject of this application.

### 4.4.8 Directive 2008/98/EC & 2018/85/EC Waste and repealing certain Directives

There is no change to the nature of development or to the development footprint of the permitted development. No waste-related impacts will occur as a result of the proposed amendments the subject of this application.

### 4.4.9 Climate Action Plan 2025

There is no change to the nature of development or to the development footprint of the permitted development. No climate related impacts will occur as a result of the proposed amendments the subject of this application.

# 5 Conclusion

The parent permission for redevelopment of the site was subject to EIAR and an EIAR was submitted with the application. Previous amendment to the permitted development were subject to screening for the requirement for EIA, and it was determined in each case that EIA and the preparation of an EIAR was not required.

*The development will consist of amendments to a previously permitted mixed-use development (DCC Reg. Ref.: 4238/19; ABP Ref. PL29S.307804, as amended by DCC Ref.:4436/23 and under current application DCC Reg. Ref.: 5050/26). The proposed amendments relate solely to the permitted Blocks B1, B2, C1, C2, D1 and D2 (identified as Phase 2). No amendments are proposed to any other permitted blocks.*

1. *The proposed alterations result in an overall increase of 2 no. units increasing the total overall units from 1196 (as currently proposed under DCC Reg. Ref.: 5050/26) to 1198. The proposed amended residential development of Block B1, B2, C1, C2, D1 and D2 will consist of a total of 635 no. residential apartments (an increase from 633 no. as permitted), which includes 38 No. Studios, 269 No. 1-Bed, 288 No. 2-Bed- 4-Person and 40 No. 3-Bed- 5-Person, units as follows:*
    - *Alteration of Block B1 from a permitted 11-12-storey building providing for 90 no. apartment units to a 10-storey building providing for 107 no. apartments (17 No. Studios, 54 No. 1-Bed, 35 No. 2-Bed- 4-Person, 1 No. 3-Bed).*
    - *Alteration of Block B2 from a permitted 10 storey building providing for 90 no. apartment units to a 10-storey building providing for 89 no. apartments (43 No. 1-Bed, 37 No. 2-Bed- 4-Person, 9 No. 3-Bed).*
    - *Alteration of Block C1 from a permitted 10-storey building providing for 171 no. apartment units to a 10-storey building providing for 144 no. apartments (47 No. 1-Bed, 88 No. 2-Bed- 4-Person, 9 No. 3-Bed).*
    - *Alteration of Block C2 from a permitted 10-storey building providing for 89 no. apartment units to a 9-storey building providing for 98 no. apartments (61 No. 1-Bed, 37 No. 2-Bed- 4-Person).*
    - *Alteration of Block D1 from a permitted 9-storey building providing for 87 no. apartment units to a 9-storey building providing for 123 no. apartments (47 No. 1-Bed, 63 No. 2-Bed- 4-Person, 13 No. 3-Bed).*
    - *Alteration of Block D2 from a permitted 8-storey building providing for 106 no. apartment units to an 8-storey building providing for 74 no. apartments (21 No. Studios, 17 No. 1-Bed, 28 No. 2-Bed- 4-Person, 8 No. 3-Bed).*
2. *The reconfiguration of internal layouts of each of the blocks has resulted in the minor shift in the block footprints. The permitted podium between Block B2 and Block C1 is removed with additional public realm and connection to the south proposed. The block amendments result in amendments to permitted communal amenity space with the removal of roof terraces on Blocks C1, C2 and D1 and amendment to roof terraces on Block B1 and B2.*
3. *Façade modifications are proposed to respond to the revised internal layouts including minor relocation of windows, balconies etc.*

4. *Alteration of the permitted uses and facade at ground floor level and removal of permitted BTR tenant amenity spaces located in Blocks B1, B2, C1 & C2 to provide for a ground floor level that includes:*
    - *Blocks B1-B2: 1 no. retail/café/restaurant unit, 1 no. café unit, 1 no. community unit, a creche (relocated from Block D1) and associated cycle parking, plant areas and entrances.*
    - *Block C1-C2-D1-D2: 1 no. retail (supermarket) unit, 2 no. retail/cafe/restaurant units, own door residential units, undercroft parking and associated cycle parking, plant areas and entrances.*
5. *Alterations to the permitted undercroft and basement parking areas under Blocks B1, B2, C1, C2, D1, & D2 to include for alterations to permitted layouts of car parking, cycle parking, plant, waste stores and substation locations. The reconfiguration of these areas results in proposed car parking of 515 no. spaces internally (178 below podium and 337 at basement level), 3 no. external spaces situated along the north-eastern boundary on the southern side of Old Naas Road. 1,016 no. long stay cycle parking spaces (all located in secure stores or at surface level).*
6. *Amendment of Condition 3 (a) of the parent permission (DCC Reg. Ref.: 4238/19; ABP Ref. PL29S.307804) relating to the Build to Rent (BTR) covenant, and its removal as it relates to Blocks B1, B2, C1, C2 & D1.*

No demolition works are required to facilitate the amendment to the permitted development.

In summary, the development relates to a proposed amendment to a previously permitted development, which does not change the nature of the permitted development or the area of the site or the development footprint.

The proposed amendments to permitted development fall below the thresholds at or above which there is a mandatory requirement for EIA.

In determining the requirement for EIA for the previous permitted amendment, the planning authority stated that:

> *"An Environmental impact Assessment Report (EIAR) was submitted with the extant planning permission DCC Reg Ref: 4238/19. The proposed development is for the relocation and reconfiguration of part basement car parking, reduction is car parking provision and the number of residential units. Overall, the proposal represents a reduction in floor space from 129,210 sq m to 128,736 sq m (- 474 sq m).*
> *It is considered that the proposal would not trigger another mandatory EIAR nor would it give rise to a sub-threshold environmental impact assessment. The development will be carried out in accordance with the conditions of the parent planning permission and normal building practices in order to mitigate against any adverse impacts.*
> *Having regard to conclusion of the Environmental Impact Assessment Report, the monitoring measures as set out within the conditions attached to DCC Reg. Ref: 4238/19, the Planning Authority is satisfied that the proposed development will not have any significant impacts on the environment."*
>
> (EIAR Section of the DCC Planner's Report)

It is considered that the proposed amendments will not have significant effects on the environment and therefore can be screened out for the requirement for EIA. The main reasons for this conclusion having regard to the full extent of the permitted development, as amended, are as follows:

- The proposed amendment on its own falls below the thresholds at or above which there is a requirement for EIA.
- There is no change to the development footprint or to the site area.
- The overall increase in residential units from that permitted is 2 no. units.
- No demolitions are proposed or required.
- The permitted development and proposed amendments remain consistent with the land use planning objectives for the area.
- The permitted development and proposed amendments remain consistent with the on-going emerging nature of the surrounding area.
- The proposed amendments will not give rise to any significant environmental effects.

The proposed amendments have been assessed in accordance with the requirements of the EIA Directive and the national legislation transposing same – specifically the Planning and Development Act 2000, as amended, and the Planning and Development Regulations 2001, as amended and Part 1 and Part 2 of Schedule 5 and the requirements of Schedules 7A and 7 of Planning and Development Regulations 2001, as amended.

Based on the assessment carried out, it can be concluded that the application for the proposed amendment will not have significant effects on the environment either during the construction phase or operational phase of the development. Therefore, having regard to the nature, scale and location of the subject site, there is no real likelihood of significant effects on the environment arising from the proposed amendment, an Environmental Impact Assessment (EIA) and the preparation of an Environmental Impact Assessment Report (EIAR) is not required.

# 6 References


- *Directive 2014/52/EU, amending Directive 2011/92/EU, on the assessment of the effects of certain public and private projects on the environmen*t;
- *Planning and Development Act 2000, as amended*
- *Planning and Development Regulations 2001, as amended*
- DoHPLG (2018). *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment.*
- EPA (2022). *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports.*
- European Commission (2013). *Guidance of Integrating Climate Change and Biodiversity into Environmental Impact Assessment*.
- European Commission (2015) *Interpretation of definitions of project categories of annex I and II of the EIA Directive*:
- European Commission (2017). *Environmental Impact Assessment of Projects – Guidance on Screening (Directive 2011/92/EU as amended by 2014/52/EU*).
- Dublin City Council (2022). *Dublin City Development Plan 2022 – 2028.*
- OPR (2021). *OPR Practice Note PN02: Environmental Impact Assessment Screening.*
- OPW (2009). *The Planning System and Flood Risk Management: Guidelines for Planning Authorities*.

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