Project: **Lands at former 'Player Wills' site, South Circular Road, St. Catherine's Avenue and Donore Avenue, Dublin 8**

Alteration of development previously permitted under ABP-308917-20 (DCC Ref: SHD0031/20), as amended by DCC Reg. Ref.: 3406/25

Applicant: **CWTC Multi Family ICAV acting solely in respect of its sub fund the DBTR SCR1 Fund**

Subject: **Screening for Environmental Impact Assessment**

1. INTRODUCTION

CWTC Multi Family ICAV acting solely in respect of its sub fund the DBTR SCR1 Fund, is applying for permission for amendments to the permitted development under ABP-308917-20 (DCC Ref: SHD0031/20), as amended by DCC Reg. Ref.: 3406/25 on a site at the former 'Player Wills' site, South Circular Road, St. Catherine's Avenue and Donore Avenue, Dublin 8.

The proposed development consists of amendments to the development at the former 'Player Wills' site, South Circular Road, St. Catherine's Avenue and Donore Avenue, Dublin 8, as permitted under ABP-308917-20 (DCC Ref: SHD0031/20) and as amended under DCC Reg. Ref.: 3406/25. The proposed amendments relate to the permitted Block PW1, which includes the former Player Wills Factory (a Protected Structure, RPS Ref: 8796), Block PW2 and Block PW5 only.

The proposed amendments include for alteration of the permitted ground floor layouts of PW1 and PW2 including the relocation of permitted amenity spaces and retail/restaurant spaces, some minor amendments to unit layouts, and amenity spaces at upper levels. It also includes for the reconfiguration of Block PW5.

Full details are included in the planning report and other documents that accompany the planning application.

2. BACKGROUND TO ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PERMITTED DEVELOPMENT

Parent Application

The application for the original permission ABP-308917-20 (DCC Ref: SHD0031/20), was subject to environmental impact assessment and an Environmental Impact Assessment Report (EIAR) was prepared. In providing for 732no. residential units on a site of 3.06 hectares, the original development exceeded the threshold of project type 10(b)(i) "*construction of more than 500 dwellings*" as set out in Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended. In carrying out an EIA, the Inspector and the Board (of An Bord Pleanála, now An Coimisiún Pleanála) set out the reasoned conclusion on significant effects[1] as follows:

> *"…it is considered that the main significant direct and indirect effects of the proposed development on the environment are as follows:*

[1] Section 12.16 of the Inspector's Report ABP-308917-20

- *Significant direct positive effects with regard to population and material assets due to the increase in the housing stock that it would make available in the urban area.*

- *A significant direct effect on land by the change in the use and appearance of a relatively large area of brownfield land to residential. Given the location of the site within the built up area of Dublin and the public need for housing in the region, this effect would not have a significant negative impact on the environment.*

- *Potential significant effects on soil during construction, which will be mitigated by the re-use of material on the site and the implementation of measures to control emissions of sediment to water and dust to air during construction.*

- *Potential effects arising from noise and vibration during construction which will be mitigated by appropriate management measures. • Potential effects on air during construction which will be mitigated by a dust management plan including a monitoring programme.*

- *Potential indirect effects on water which will be mitigated during the occupation of the development by the proposed system for surface water management and attenuation with respect to stormwater runoff and the drainage of foul effluent to the public foul sewerage system, and which will be mitigated during construction by appropriate management measures to control the emissions of sediment to water.*

- *A positive effect on the streetscape because the proposed development would improve the amenity of the land through the provision of dedicated public open spaces and improved public realm.*

- *A direct positive effect on cultural heritage due to the proposed alterations to existing built heritage features within the site and the positive impact on cityscape views.*

In conclusion on the EIA the Inspector's assessment notes that "[t]*he environmental impacts identified are not significant and would not justify refusing permission for the proposed development or require substantial amendments to it.*"

The Board concluded in its Direction "*that, subject to the implementation of the mitigation measures set out in the environmental impact assessment report, and subject to compliance with the conditions set out below, the effects on the environment of the proposed development, by itself and in combination with other development in the vicinity, would be acceptable. In doing so, the Board adopted the report and conclusions of the Inspector.*"

First amendment application

A note on EIA screening was also prepared for the first amendment application, subsequently permitted (DCC Reg. Ref.: 3406/25). In its Planner's Report DCC confirmed that there are no further environmental considerations having regard to the initial assessment detailed in the previous main report.

3. SCREENING OF THE PROPOSED AMENDMENTS FOR EIA

3.1. The Permitted Development and the Requirement for EIA

As noted in Section 2 of this report, an EIAR was submitted with the application for the parent permission (ABP-308917-20 & DCC Ref: SHD0031/20) and the Permitted Scheme was subject to EIA. The requirement for EIA was screened out for the amendment applications (DCC Reg. Refs.:3406/25).

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'.

While the parent permission relates to a residential / urban development, and the first amendment (permitted) related to the omission of a basement level and the consolidation of parking, the proposed amendments are limited to alteration of the permitted ground floor layouts of PW1 and PW2 including the relocation of permitted amenity spaces and retail/restaurant spaces, some minor amendments to unit layouts, and amenity spaces at upper levels. It also includes for the reconfiguration of Block PW5. There is no change to the previously permitted number of residential units and no change in the development site area.

The proposed development (residential / urban development in nature) is not of a project or type listed in Part 1 of Schedule 5 of the Regulations. Likewise the proposed development, as summarised in this report, (and described in detail in the Planning Report (BSM, 2026)), does not meet or exceed a stated threshold in Part 2 of Schedule 5 of the Regulations. Therefore, the proposed development does not meet the minimum requirements for which an environmental impact assessment is mandatory.

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 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.

3.2. Provision of Information as Required of Schedule 7A of the PDR 2001

While it is considered that there is no requirement for EIA or for Screening for EIA, the information as required of the applicant (i.e. Schedule 7A of PDR 2001) for the purposes or 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.

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 (refer to Appendix 1).

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 information is provided in the following Table 7A.1.

Table 7A.1: Characteristics of proposed development

1. A description of the proposed development, including in particular----	
(a) a description of the physical characteristics of the whole proposed development and, where relevant, of demolition works, and	The proposed amendments relate to the permitted Block PW1, which includes the former Player Wills Factory (a Protected Structure, RPS Ref: 8796), Block PW2 and Block PW5 only. The proposed amendments include for alteration of the permitted ground floor layouts of PW1 and PW2 including the relocation of permitted amenity spaces and retail/restaurant spaces, some minor amendments to unit

1. A description of the proposed development, including in particular----	
	layouts, and amenity spaces at upper levels. It also includes for the reconfiguration of Block PW5. There is no change to the number of permitted residential units or to the development site area.
(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 proposed development relates to amendments to permitted development at the Player Wills site located on the northern side of the South Circular Road (SCR), Dublin 8. The lands are brownfield in nature and contain former industrial premises comprising three factory buildings, including the Player Wills art deco factory building. The site is bounded to the east by Donore Avenue and St. Catherine's Avenue which comprises two-storey red brick terraced houses, school and churches of a strong architectural character. To the west / northwest is a large site currently being developed by the LDA as part of the 'Donore Project' (ABP Reg. Ref.: 315306-22). To the west of the subject site is the former 'Bailey Gibson' site (permitted under ABP Reg. Ref: 307221-20, as extended by DCC Reg. Ref.: SHD0009/20/X1).
2. A description of the aspects of the environment likely to be significantly affected by the proposed development.	
The proposed amendments relate to the permitted Block PW1, which includes the former Player Wills Factory (a Protected Structure, RPS Ref: 8796), Block PW2 and Block PW5 only. The proposed amendments include for alteration of the permitted ground floor layouts of PW1 and PW2 including the relocation of permitted amenity spaces and retail/restaurant spaces, some minor amendments to unit layouts, and amenity spaces at upper levels. It also includes for the reconfiguration of Block PW5. There will be no change in any impact on land and soils, water, climate, and material assets (waste) compared to the permitted development. There is no change in the number of residential units provided or in the area of the development site. As such, there is no change in the impact on population and human health, biodiversity, air, cultural heritage, landscape and on interactions between environmental factors.	

1. A description of the proposed development, including in particular----	
The proposed amendments will result in no additional negative environmental impacts, and no aspects of the environment are likely to be significantly affected by the proposed development.	
3. description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from—	
(a) the expected residues and emissions and the production of waste, where relevant, and	There will be no change to the expected residues, emissions and generation of waste compared to the permitted development.
(b) the use of natural resources, in particular soil, land, water and biodiversity.	There will be no change to the expected impacts on soil, water, land, biodiversity or any other natural resource compared to the permitted development.
The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7	
Refer to Tables 7.1, 7.2 and 7.3 below.	

The criteria for determining whether development, listed in Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended, should be subject to environmental impact assessment are set out in Schedule 7 of the Planning and Development Regulations 2001, as amended. The criteria and the corresponding screening for the proposed development is set out in the following tables (7.1 to 7.3).

Table 7.1: Characteristics of proposed development

The characteristics of proposed development, in particular----	
(a) the size and design of the whole of the proposed development,	The proposed amendments relate to the permitted Block PW1, which includes the former Player Wills Factory (a Protected Structure, RPS Ref: 8796), Block PW2 and Block PW5 only. The proposed amendments include for alteration of the permitted ground floor layouts of PW1 and PW2 including the relocation of permitted amenity spaces and retail/restaurant spaces, some minor amendments to unit layouts, and amenity spaces at upper levels. It also includes for the reconfiguration of Block PW5. There is no change to the number of permitted residential units or to the development site area.
(b) cumulation with other existing development and/or development the subject of a consent for proposed development for the purposes of section	The proposed amendments relate to a parent permission (ABP-308917-20 (DCC Ref: SHD0031/20)), which was subject to environmental impact assessment, and

The characteristics of proposed development, in particular----	
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,	amended by DCC Reg. Ref.: 3406/25 (for which the requirement for EIA was screened out). In addition lands to the west / northwest of the site are currently under development by the LDA as part of the 'Donore Project', which was subject to environmental impact assessment (ABP Reg. Ref.: 315306-22). To the west of the subject site is the former 'Bailey Gibson' site (permitted under ABP Reg. Ref: 307221-20 (which was subject to environmental impact assessment), as extended by DCC Reg. Ref.: SHD0009/20/X1).
(c) the nature of any associated demolition works,	There is no change to works of demolition as previously permitted under ABP-308917-20 (DCC Ref: SHD0031/20) as amended by DCC Reg. Ref.: 3406/25.
(d) the use of natural resources, in particular land, soil, water and biodiversity,	There is no change in the area of permitted development, and no change to the impact on soil, water, land or biodiversity.
(e) the production of waste,	There is no change to the expected residues and generation of waste.
(f) pollution and nuisances,	The proposed amendment to the permitted development will result in no change in terms of pollution and nuisances from the permitted development.
(g) the risk of major accidents, and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge, and	The proposed amendment to the permitted development will result in no change in terms of risk of major accidents, and/or disasters from the permitted development.
(h) the risks to human health (for example, due to water contamination or air pollution).	The proposed amendment to the permitted development will result in no change in terms of risks to human health.

Table 7.2: Location of proposed development

The environmental sensitivity of geographical areas likely to be affected by the proposed development, with particular regard to----	
(a) the existing and approved land use,	The site is zoned Z14 within the Development Plan 2022-2028. The stated objective of this zoning is to "*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 environmental sensitivity of geographical areas likely to be affected by the proposed development, with particular regard to----	
	The site includes permission for 732no. residential units on a site of 3.06 hectares, under ABP-308917-20 (DCC Ref: SHD0031/20), as amended by DCC Reg. Ref.: 3406/25.
(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground,	The proposed amendments to the permitted development have no effect on the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground.
(c) the absorption capacity of the natural environment, paying particular attention to the following areas:	The proposed amendments to the permitted development will have no effect on the absorption capacity of the natural environment.
(i) wetlands, riparian areas, river mouths;	Does not apply
(ii) coastal zones and the marine environment;	Does not apply
(iii) mountain and forest areas;	Does not apply
(iv) nature reserves and parks;	Does not apply
(v) areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive and;	The Screening for Appropriate Assessment (BSM, 2026) has concluded that: "*In view of best scientific knowledge this report concludes that the proposed amendments to the development permitted by An Bord Pleanála (ABP Reg. Ref.: ABP-308917-20) and Dublin City Council (3406/25) at the Player Wills Site, individually or in combination with another plan or project, will have no likely 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.* *It is considered that this report provides sufficient relevant information to allow the Competent Authority (Dublin City Council) to carry out an AA Screening and reach a determination that the proposed development will not have any likely significant effects on European sites in light of their conservation objectives.*"
(vi) areas in which there has already been a failure to meet the environmental	Does not apply

The environmental sensitivity of geographical areas likely to be affected by the proposed development, with particular regard to----	
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;	While the permitted development is located within a city residential area, the proposed amendments, will not result in any environmental effect on densely populated areas.
(viii) landscapes and sites of historical, cultural or archaeological significance.	The proposed amendments to the permitted development will not result in any environmental effect on landscapes and sites of historical, cultural or archaeological significance. PW1 is a Protected Structure and an assessment of the impacts have been considered.

Table 7.3: Types and characteristics of potential impacts

The likely significant effects on the environment of proposed development in relation to criteria set out under paragraphs 1 and 2, with regard to the impact of the project on the factors specified in paragraph (b)(i)(I) to (V) of the definition of 'environmental impact assessment report' in section 171A of the Act, taking into account----	
(a) the magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected),	The proposed amendments relate to the permitted Block PW1, which includes the former Player Wills Factory (a Protected Structure, RPS Ref: 8796), Block PW2 and Block PW5 only. There is no change to the number of permitted residential units or to the development site area. The magnitude and spatial extent of any impact is limited to the development zone and there is no change in the expected environmental effects.
(b) the nature of the impact,	The proposed amendment results in no change to the nature of the expected impact of the permitted development.
(c) the transboundary nature of the impact,	Does not apply
(d) the intensity and complexity of the impact,	The proposed amendment results in no change to the intensity and complexity of any related

The likely significant effects on the environment of proposed development in relation to criteria set out under paragraphs 1 and 2, with regard to the impact of the project on the factors specified in paragraph (b)(i)(I) to (V) of the definition of 'environmental impact assessment report' in section 171A of the Act, taking into account----	
	impact associated with the permitted development.
(e) the probability of the impact,	The proposed amendment results in no change to the probability of any related impact associated with the permitted development.
(f) the expected onset, duration, frequency and reversibility of the impact,	The proposed amendment results in no change to the expected onset, duration and frequency of the related impact of any related impact associated with the permitted development.
(g) the cumulation of the impact with the impact of other existing and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment, and	The proposed amendments relate to a parent permission (ABP-308917-20 (DCC Ref: SHD0031/20)), which was subject to environmental impact assessment, and amended by DCC Reg. Ref.: 3406/25 (for which the requirement for EIA was screened out). In addition lands to the west / northwest of the site are currently under development by the LDA as part of the 'Donore Project', which was subject to environmental impact assessment (ABP Reg. Ref.: 315306-22). To the west of the subject site is the former 'Bailey Gibson' site (permitted under ABP Reg. Ref: 307221-20 (which was subject to environmental impact assessment), as extended by DCC Reg. Ref.: SHD0009/20/X1).
h) the possibility of effectively reducing the impact.	The proposed amendment results in no change to any related impact associated with the permitted development.

Finally, it is also noted that the Board's findings in carrying out the EIA for the original permission that the proposed development would not result in significant environmental effects and that effects identified would be acceptable. Therefore, even in the context of the original EIA and the EIA screening process for the amendment previously permitted, the proposed amendments, will not result in significant environmental effects.

4. CONCLUSION

The proposed development consists of amendments to development previously permitted under ABP-308917-20 (DCC Ref: SHD0031/20), as amended by DCC Reg. Ref.: 3406/25.

The proposed amendments relate to the permitted Block PW1, which includes the former Player Wills Factory (a Protected Structure, RPS Ref: 8796), Block PW2 and Block PW5 only.

The proposed amendments include for alteration of the permitted ground floor layouts of PW1 and PW2 including the relocation of permitted amenity spaces and retail/restaurant spaces, some minor amendments to unit layouts, and amenity spaces at upper levels. It also includes for the reconfiguration of Block PW5.

There is no change to the number of permitted residential units or to the development site area.

Thus, the proposed amendments will result in no changes to any predicted environmental impact compared to the permitted development.

The screening report concludes that there is no requirement for a mandatory environmental impact assessment as the proposed amendments do not meet the minimum requirements of either Part 1 or Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended.

Likewise, the screening report concludes that there is no possibility of the proposed amendments giving rise to likely significant effects on the environment.

Therefore, it can be concluded that the proposed development, comprising amendments to previously permitted development, will not give rise to likely significant effects on the environment and there is no requirement for environmental impact assessment.