PRUSSIA ST LRD AMENDMENTS

EIA Technical Note

Randalswood Construction Ltd

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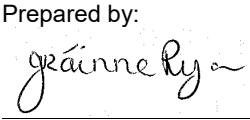		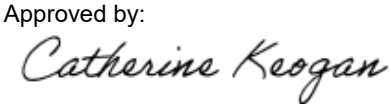
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1 INTRODUCTION

DNV was commissioned by Randalswood Construction Ltd to undertake an Environmental Impact Assessment (EIA) technical note for changes to the permitted Large-scale Residential Development, located on lands at 23-28 Prussia Street, Dublin 7, located at the junction of Prussia Street and St. Joseph's Road hereafter referred to as the 'Proposed Development' and 'site').

The purpose of this note is to provide information to assist the Dublin City Council to determine the need for a statutory environmental impact assessment with reference to a Permitted Development (Reg. Ref. LRD6057/24-S3A as amended by Reg. Ref. WEBLRD6103/26-S3) due to amendments to the consented Large-scale Residential Development.

This EIA technical note is set out in the following sections:

- Project overview and background;
- Legislative requirements for an EIA and commentary against Schedule 5 of the Planning and Development Regulations 2001 (as amended); and
- Scope of the EIA screening appraisal under Schedule 7 and 7A of the Planning and Development Regulations 2001 (as amended)
- Conclusion

1.1 Competency of the Authors

This EIA Technical Note has been prepared by DNV's EIA team: Gráinne Ryan and Catherine Keogan.

This report was prepared by Gráinne Ryan, Principal EIA Consultant at DNV. Gráinne is an Environmental Consultant with 13 years' experience, specialising in EIAs for strategic infrastructure, renewable energy, residential, industrial and pharmaceutical projects. Gráinne has a B.A, in Geography, Planning and Environmental Policy, an MSc in Environmental Policy and a Post Graduate Diploma in Project Management.

This report was reviewed and approved by Catherine Keogan, Technical Director and EIA Lead at DNV. Catherine is an environmental consultant with 37 years' experience in consultancy, specialising in EIAs for large-scale residential, commercial developments, pharmaceutical, BESS and solar projects working closely with a range of developers, planning consultants and architects within the public and private sector. Catherine has a B.Sc. (Hons) in Analytical Science and a Post Graduate Diploma in Renewable Energy Technology System.

1.2 Project Overview and Background

1.2.1 Site Location

The site is located to the east of Prussia Street (Nos. 23-28) opposite the junction with St. Joseph's Road. The site is a skewed rectangle in shape, which extends to approximately 0.38 hectares and fronts onto Prussia Street. It is bound to the north by No. 29 Prussia Street (a Protected Structure) and a car repair centre, and by residential dwellings to the south. The TU Grangegorman Campus is adjacent to the subject site to the east, with the stone boundary wall of St. Brendan's Hospital forming the east (rear) boundary of the site – partly incorporated into existing structures within the site.

Figure 1-1 shows the overall site location for the Proposed Development.



Figure 1-1: Proposed Site Layout (C+W O'Brien Architects, 2026)

1.2.2 Project Description

The Proposed Development will consist of proposed modifications to the previously permitted Large-scale Residential Development (LRD) (permitted under planning permissions Reg. Ref. LRD6057/24-S3A and Reg. Ref. WEBLRD6103/26-S3), including modifications to the previously permitted total number of apartment units (110 no. permitted units to now provide a total of 120 no. apartment units i.e. 74 no. 1 beds, 43 no. 2 beds, 2 no. 3 beds, and 1 no. 4 bed) as follows:

Modifications to Block C from a total of 53 no. permitted apartments comprising of 34 no. 1 beds and 19 no. 2 beds, in a permitted building ranging from 7-8 storeys in height, to now provide two additional storeys to this block, to provide for a total of 63 no. apartments comprising of 40 no. 1-beds and 23 no. 2-beds, with modifications to the unit mix of the permitted seventh floor, in a building now ranging from 7-10 storeys in height, and all apartments provided with private balconies/terraces to south, east and west elevations; 16 no. additional cycle parking spaces to now provide a total of 240 no. cycle parking spaces on site, and all associated site works necessary to facilitate the development.

The Proposed Development shall provide further amendments to a previously permitted LRD development, under Reg. Ref. LRD6057/24-S3A, which has previously been amended under planning permission Reg. Ref. WEBLRD6103/26-S3. The parent permission was granted for 102 no. apartments on the subject site, across 3 no. blocks ranging in height from 3- 8-storeys in height. The applicant has since prepared the necessary pre-commencement planning compliance submissions to allow enabling works and construction to commence on site in recent months. Under planning permission Reg. Ref. WEBLRD6103/26-S3, by Order dated 27th April 2026, permission was granted for modifications to the unit mix of the parent permission to now provide a total of 110 no. units within the same building block. This alteration was proposed to align with the recent Planning Design Standards for Apartments Guidelines for Planning Authorities, (2025).

The applicant is now seeking permission for a further amendment to the permitted development, which will provide for an additional 10 no. units on site (a total of 120 no. units now proposed). This is being achieved through the proposal of 2 no. additional storeys on Block C at a new 8th and 9th floor, as well as a minor changes in unit mix proposed on the permitted 7th floor.

1.3 Legislative Requirements for an EIA

Directive 2011/92/EU was enacted to assess the effects of projects on the environment, and to properly ensure that any potential significant effects are assessed before a project proceeds. Annex I of Directive 2011/92/EU, as amended by Directive 2014/52/EU defines mandatory projects that require an Environmental Impact Assessment Report (EIAR) (formerly EIS) and Annex II lists projects which do not necessarily have significant effects but can be subject to case-by-case analysis or thresholds to be determined by member states. Section 172 of the Planning and Development Act 2000, as amended, provides the legislative basis for mandatory EIA. It states the following: “An environmental impact assessment shall be carried out by the planning authority or the Board, as the case may be, in respect of an application for consent for proposed development where either —

(a) the proposed development would be of a class specified in —
(i) Part 1 of Schedule 5 of the Planning and Development Regulations 2001, and either —
(I) such development [would equal or exceed, as the case may be,] any relevant quantity, area or other limit specified in that Part, or
(II) no quantity, area or other limit is specified in that Part in respect of the development concerned, or
(ii) Part 2 [(other than subparagraph (a) of paragraph 2)] of Schedule 5 of the Planning and Development Regulations 2001 and either —
(I) such development [would equal or exceed, as the case may be,] any relevant quantity, area or other limit specified in that Part, or
(II) no quantity, area or other limit is specified in that Part in respect of the development concerned, or

(b) (i) the proposed development would be of a class specified in Part 2 of Schedule 5 of the Planning and Development Regulations 2001 but F594 [does not equal or exceed, as the case may be,] the relevant quantity, area or other limit specified in that Part, and
(ii) it is concluded, determined or decided, as the case may be, —
(I) by a planning authority, in exercise of the powers conferred on it by this Act or the Planning and Development Regulations 2001 (S.I. No. 600 of 2001),
(II) by the Board, in exercise of the powers conferred on it by this Act or those regulations,

(III) by a local authority in exercise of the powers conferred on it by regulation 120 of those regulations,
(IV) by a State authority, in exercise of the powers conferred on it by regulation 123A of those regulations,
(V) in accordance with section 13A of the Foreshore Act, by the appropriate Minister (within the meaning of that Act), or
(VI) by the Minister for Communications, Climate Action and Environment, in exercise of the powers conferred on him or her by section 8A of the Minerals Development Act 1940 ,
that the proposed development is likely to have a significant effect on the environment."

In some cases, Member States have also established "exclusion" or "negative" lists specifying thresholds and criteria below which EIA is never required or below which a simplified EIA procedure applies. There may be exceptions to the negative thresholds, for example, for projects in defined sensitive locations. Such exceptions will apply in the case of Habitats Directive assessments. The use of exclusion lists, defining thresholds below which EIA is never required, is very limited in the EU Member States. In Ireland, the thresholds are defined in 'Article 120 of the Planning and Development Regulations 2001, as amended.

1.4 Review of Schedule 5: Part 1 of the Planning and Development Regulations, 2001, as amended.

Schedule 5 of the Planning and Development Regulations 2001, as amended outlines the legislative requirements deeming whether a project needs a mandatory EIA. Projects that automatically require EIA are included in Annex 1 of the EIA Directive and listed in Part 1 of Schedule 5 to the Planning and Development Regulations, 2001 as amended.

The amendments to the previously permitted development are not listed as a project of Part 1 of Schedule 5 of Planning and Development Regulations, 2001 as amended.

1.5 Review of Schedule 5: Part 2 of the Planning and Development Regulations, 2001, as amended.

Projects that are assessed either on a case-by-case examination or on the basis of set mandatory thresholds are defined under Annex II of the EIA Directive. These are transposed in Irish legislation in Schedule 5, Part 2 of the Planning and Development Regulations, 2001 as amended.

Table 1-1 details categories of infrastructure projects which could potentially be relevant to the Proposed Development on lands at Crodaun, Celbridge, Co. Kildare as set out under Schedule 5, Part 2 of the Planning and Development Regulations, 2001 as amended.

Table 1-1:Infrastructure projects which could potentially be relevant to the Proposed Development

SCHEDULE 5 DEVELOPMENT FOR THE PURPOSES OF PART 10 PART 2	
10. Infrastructure projects	**Response**
10. (b) (i) Construction of more than 500 dwelling units.	The total number of residential units to be constructed for the Proposed Development is 120 units. It is substantially fewer than the 500-dwelling unit size threshold and accordingly a mandatory EIA is not required.
10. (b) (ii) Construction of a car park providing more than 400 spaces, other than a car park provided as part of, and incidental to the primary purpose of, a development.	There is no formal car parking included with the permitted development or the proposed amendments. Therefore, this criteria is not met for a mandatory EIA to be required.
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. (In this paragraph, "business district" means a district within a city or town in which the predominant land use is retail or commercial use.)"	The site is located in other parts of a built-up area thus the area threshold of 10 hectares applies. As the total area of the site for development has been confirmed as 0.38 hectares, which is less than the required threshold and accordingly a mandatory EIA is not required. There are no changes to this as part of the amendments.
13. Changes, extensions, developments and testing	Response

SCHEDULE 5 DEVELOPMENT FOR THE PURPOSES OF PART 10 PART 2	
13. (c) Any changes to or extension of development being of a class listed in Part 1 or paragraphs 1 to 12 of Part 2 of this Schedule, which would result in the demolition of structures, the demolition of which had not previously been authorised, and where such demolition would be likely to have significant effects on the environment, having regard to the criteria set out under Schedule 7.	The Proposed Development comprises amendments to a previously permitted Large-scale Residential Development and has been assessed in accordance with Schedule 5, Part 2, Class 13(c) and the Schedule 7 criteria of the Planning and Development Regulations 2001, as amended, to determine whether the proposed changes are likely to result in significant effects on the environment.
14. Works of Demolition	**Response**
Works of demolition carried out in order to facilitate a project listed in Part 1 or Part 2 of this Schedule where such works would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.	There demolition works as part of the consented development. However, there are no changes to this as part of the proposed amendments. Thus, a mandatory EIA is not required.

1.6 EIA Screening Assessment: Schedule 7 of the Planning and Development Regulations, 2001, as amended.

The proposed amendments relate to a previously permitted Large-scale Residential Development (LRD) and comprise modifications to Block C, including the addition of two storeys and associated changes to the apartment unit mix. The amendments will increase the total number of apartments within the overall development from 110 no. permitted units to 120 no. units and will provide a revised mix comprising 74 no. one-bedroom units, 43 no. two-bedroom units, 2 no. three-bedroom units and 1 no. four-bedroom unit. The proposed changes are confined to Block C and include the provision of 10 no. additional apartments, modifications to the seventh-floor layout, and an increase in cycle parking provision from the previously permitted level to a total of 240 no. spaces. No changes are proposed to the overall site area, development boundary, access arrangements, road network, drainage infrastructure, public open space provision or the general function of the permitted development.

Having regard to the criteria set out in Schedule 7 of the Planning and Development Regulations 2001, as amended, the proposed amendments do not materially alter the overall characteristics of the permitted development to an extent that would give rise to likely significant environmental effects. While the amendments involve an increase in the height of Block C from a permitted 7-8 storeys to 7-10 storeys and a corresponding increase in residential unit numbers, the changes remain within an established urban context and do not introduce any new land uses, significant increases in activity levels, or additional demands on infrastructure beyond those already assessed as part of the permitted development.

The amendments have been reviewed in the context of the environmental topics typically considered during EIA screening, including population and human health, traffic and transportation, air quality, noise and vibration, biodiversity, water, land and soils, cultural heritage, landscape and visual amenity, climate, material assets and interactions between these factors. The nature and scale of the proposed changes do not introduce new pathways for environmental effects or affect environmentally sensitive locations. Furthermore, the increase in development quantum is modest in the context of the overall scheme and can be accommodated within the capacity of the existing and permitted infrastructure serving the development.
The proposed amendments do not materially alter the environmental context within which the development was previously assessed. The site remains unchanged in extent and the proposed modifications occur entirely within the permitted development envelope. There are no changes that would be likely to result in significant effects on the environment, either individually or cumulatively with existing, permitted or approved developments. The amendments are considered to remain substantially consistent with the environmental assumptions and assessments underpinning the extant permissions.

On this basis, it is considered that the proposed amendments do not constitute a significant change or extension of development that would be likely to give rise to significant effects on the environment. Accordingly, the amendments do not necessitate the preparation of a new Environmental Impact Assessment Screening Assessment. This Technical Note provides sufficient information to demonstrate that the proposed changes do not alter the conclusions of the previous environmental assessments and that the potential for significant environmental effects remains unchanged..

2 CONCLUSION

The Proposed Development amendments are not listed as a project under Part 1 of Schedule 5 of the Planning and Development Regulations 2001, as amended, and therefore do not require a mandatory EIAR under these provisions.

The Proposed Development is considered sub-threshold under Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended.

The proposed amendments comprise modifications to the previously permitted Large-scale Residential Development, including the addition of two storeys to Block C, revisions to the approved apartment mix and the provision of an additional 10 no. residential units, increasing the total number of apartments from 110 no. units to 120 no. units. The amendments are confined to a previously permitted building within the development and do not alter the overall site area, development boundary, access arrangements, road layout, drainage strategy, public open space provision or the overall character and function of the permitted development.

The proposed amendments remain within the environmental envelope of the consented development and do not give rise to any likely significant effects on the environment. Having regard to the nature, scale and location of the proposed changes, and the criteria contained in Schedule 7 of the Planning and Development Regulations 2001, as amended, it is concluded that the amendments do not necessitate the preparation of a new Environmental Impact Assessment Screening Determination or an Environmental Impact Assessment Report (EIAR). This Technical Note demonstrates that the previous environmental assessment conclusions remain valid and that the proposed amendments can be appropriately considered through the planning process without any further EIA requirements.

3 REFERENCES

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