

South Dublin County Council  
Proposed Stables & Courtyards Development  
Rathfarnham Castle Park  
Rathfarnham

Screening for EIA  
April 2025



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## Introduction

South Dublin County Council intends to carry out development at the former South Dublin County Council Depot, at the Stables and Courtyards of Rathfarnham Castle and the adjoining Sean Keating Garden, Grange Road/Rathfarnham Road, Dublin 14 (D14 FC62 & D14 XT02), Rathfarnham Castle (Protected Structure RPS. 221) Grange Road, Rathfarnham, Dublin 14, on a development site of 1.1725 hectares.

The development will consist of the refurbishment and change of use of the former stable buildings and former council depot yards, to provide mixed-use cultural/arts/cafe/ restaurant uses together with retail use, WC's, storage areas and a switch room.

The site is bounded by Castleside Drive to the north, Rathfarnham Road to the west and Rathfarnham Castle and its grounds to the south and east. The River Dodder is approximately 360m to the west of the site.

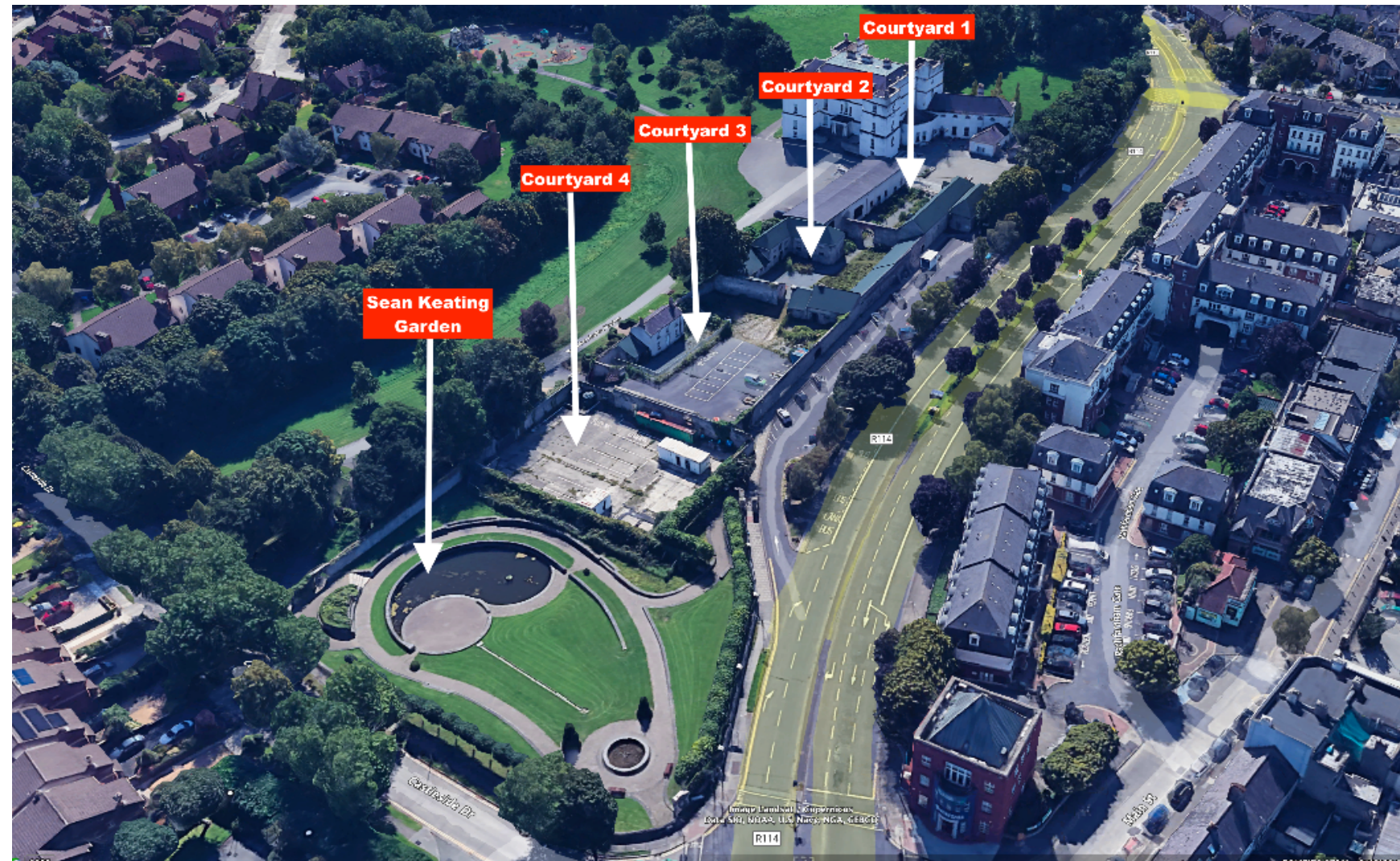
This screening report in respect of Environmental Impact Assessment is compiled in relation to the proposal by South Dublin County Council, under Part 8 of the Planning and Development Regulations 2001 (as amended), for said development of the Stables and Courtyards of Rathfarnham Castle and the adjoining Sean Keating Garden, at Rathfarnham Castle, Rathfarnham, Co. Dublin. The development site is within the zone of notification for Rathfarnham Castle, a National Monument (RMP DU022-014, Nat.Mon. 628) and a Protected Structure (RPS. 221).

This EIA screening report has been compiled by Doyle Kent Planning Partnership Ltd, who have many years' experience of the EIA process and the directors of which hold qualifications in Architecture, Planning, Urban and Building Conservation and EIA management. Relevant contributions from other members of the design team in respect of the various environmental topics have been included in compiling the report. The proposed development is lead and designed by Howley Hayes Cooney Architects under the guidance of South Dublin County Council officers.

The members of the design team include:

- Howley Hayes Cooney Architects – Grade 1 Conservation Architect
- CORA Consulting Engineers
- Homan O'Brien, Consulting Engineers (Mechanical + Electrical)
- DFLA Landscape Architects
- NRB Consulting Engineers (Traffic + Transport)
- Altermar Marine and Environmental Consultants Ecology
- IAC Archaeology
- John Morris Arborist
- Doyle Kent Planning Consultant and EIAR Screening

This EIA screening report includes Appendix I indicating how the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive (Directive 2014/52/EU) have been taken into account.



Google Aerial View



The Site

Rathfarnham Castle was constructed c.1583, by Adam Loftus, Archbishop of Dublin. It is considered to be the first fortified house in Ireland, other later examples include Kanturk (1601), Portumna (1610), and Raphoe (1636). Rathfarnham Castle is a Protected Structure (RPS 221), a Recorded Monument (RMP DU022-014) and a National Monument (No. 628).

The history of the Castle and demesne is set out in detail in the Design Statement by Howley Hayes Cooney Architects.

Rathfarnham Castle demesne at one time extended to include a very large area and deeds of Rathfarnham Castle Park from 1711 and 1738 identify the Castle with a deer park extending to over 300 acres. In 1900 Valuation Office records show that the Castle lands extended to 296 acres. About 1915 around one hundred acres to the north-east of the estate were also developed into the Castle Golf Club. By the 1960s some eighty acres of the demesne were sold to the fruit grower Benjamin Lamb (of Lamb's jams and Fruitfield), who also bought the Ely Gate, formerly principal entrance to the demesne located approximately one kilometre to the north-east, between the Lower Dodder Road and the R112 Regional Road. Construction of the Rathfarnham by-pass road in the late 1970s removed a large section of the demesne wall and severed the Castle from Rathfarnham village.

The Castle changed ownership a number of times over the centuries and in 1913 the Blackburne family sold it to the building firm Bailey & Gibson, who subsequently sold off the Castle and over fifty acres of land to the Jesuit Order for residential accommodation. The Jesuits added two large accommodation blocks to the Castle, which blocks have since been demolished.

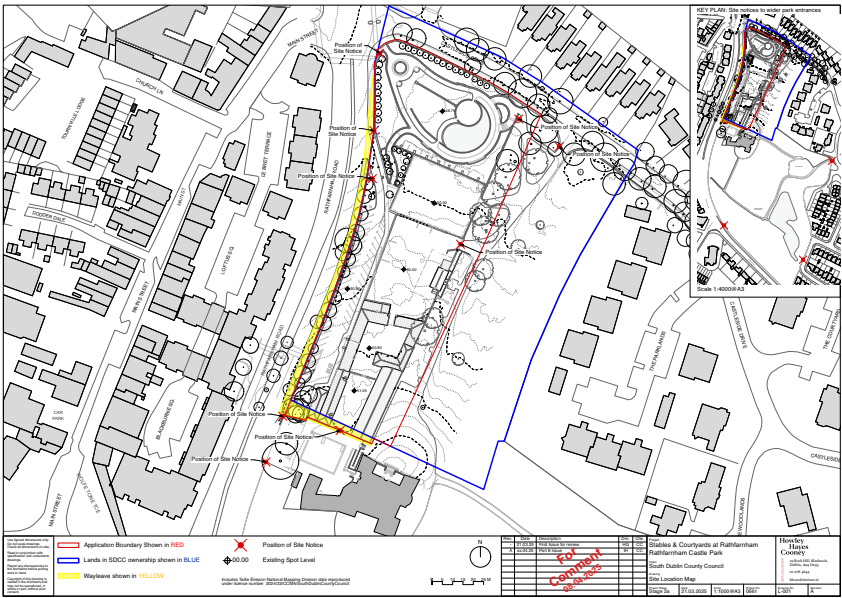
The Castle was purchased by the Office of Public Works in 1987, including lands (c.1.24ha) immediately adjoining the building. The remaining lands (c.5.49ha) were brought under the control of the then local authority Dublin County Council, predecessor of South Dublin County Council. The extensions to the Castle, erected by the Jesuits, were removed and restoration works were put in train to restore the building.

Over time, a full complex of farm buildings, stables and yards had been developed in close proximity to the Castle. Although many of the original gardens and associated structures no longer exist, there remain a number of structures and enclosed yards located to the north of the Castle. This complex contains four walled courtyards, stretching northwards from the rear of the Castle and with a combined area of 4,586 m².

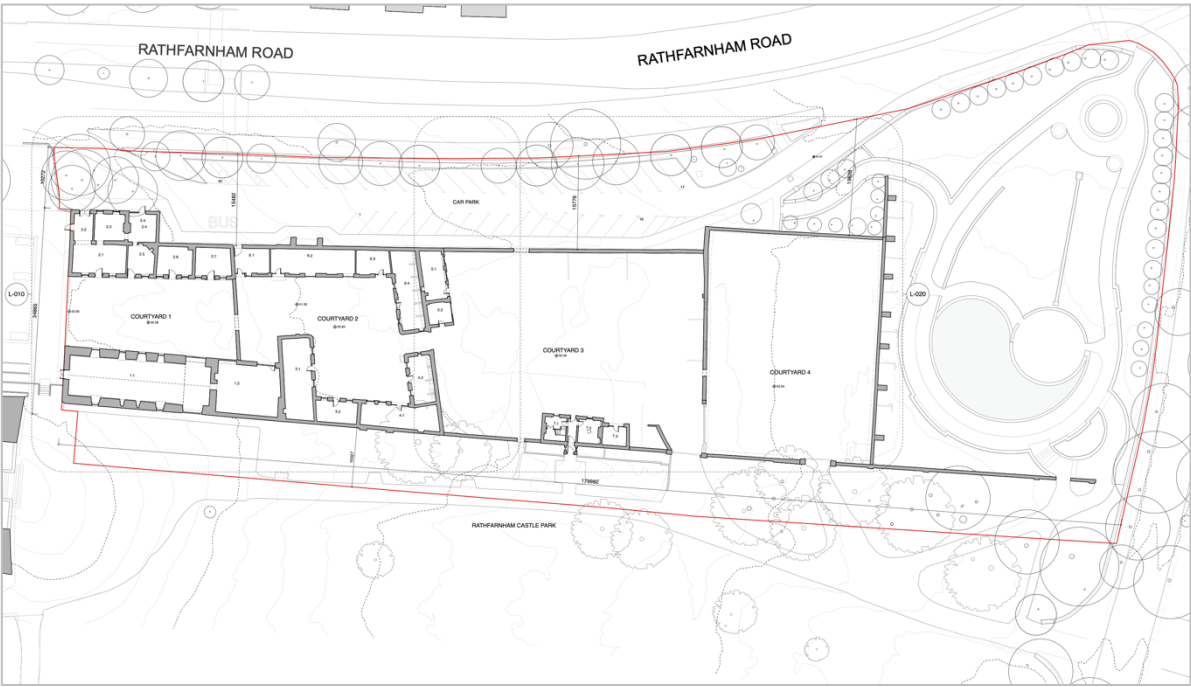
Conservation works to the Castle by the OPW facilitated the opening of the building to the public several years, also including a small café. A public car park was developed to the west, between the bypass road and the farmyard complex. However, the farmyards and farm buildings currently remain closed to the public and have been used in part as a depot by the County Council.

By 2018, the farm buildings had fallen into considerable disrepair. The County Council undertook a programme of repair and renewal, including replacement of roofs. On the basis of speed and efficiency, metal sheeting on pre-fabricated roof trusses was employed in many cases. The buildings in their current condition are briefly described below and in greater detail in the Design Statement by Howley Hayes Cooney Architects.

By 2018, the farm buildings had fallen into considerable disrepair. The County Council undertook a programme of repair and renewal, including replacement of roofs. On the basis of speed and efficiency, metal sheeting on pre-fabricated roof trusses was employed in many cases. The buildings in their current condition are briefly described below and in greater detail in the Design Statement by Howley Hayes Cooney Architects.



Site Location



Existing Layout of Farmyards

### Building B1

Courtyard 1 is the nearest to the Castle and contains two buildings. The earliest of these buildings is given the number B1 and it is on the eastern side of Courtyard 1. This building is the remaining part of an apparently larger L-shaped structure (on plan) which is called *Cromwell's Fort* and originally dated from around the time of construction of the Castle. It is believed that Oliver Cromwell stayed in the Castle on his visit to Dublin.

Building B1 is therefore a late mediaeval structure, parts of which have been dated to the sixteenth century, though greatly altered in the early twentieth century by the Jesuits. The roof is now covered with a shallow-pitched fibreglass laid on a timber structure over the existing masonry walls, installed by SDCC in 2018.

In general, the walls are constructed of calp limestone with stones of various sizes, finished in a lime render. Exposed brick forms the surrounds of the openings. But, the west façade at the north end, which is accessed from Courtyard 2, contains mass concrete construction. The building is surmounted by a 600-800mm deep concrete ring beam, probably built as part of the Jesuit residential block, itself since demolished and which was constructed over the earlier building.

Building B1 contains two distinct spaces, one of which measures approx. 24m long by 7m wide and another room which is approx. 8m by 10m. A feature of the building is the vaulted ceiling to the upper floor. Mortar taken for sampling revealed dates contemporaneous with the Castle i.e. sixteenth century.

The other building in Courtyard 1 is B2, on the western side of the courtyard and is believed to be from the early nineteenth century. Building B2 was in residential use and consists of two ranges, running western side of Courtyard 1. The western range faces Rathfarnham Road and is approximately half the length of the eastern range. While the ranges appear approximately equal in height, the western range is single storey, the other has a series of mezzanine / loft spaces served by dormer windows. The roofs consist of a pitched timber structure, and temporary profiled metal roofing.

### Building B3

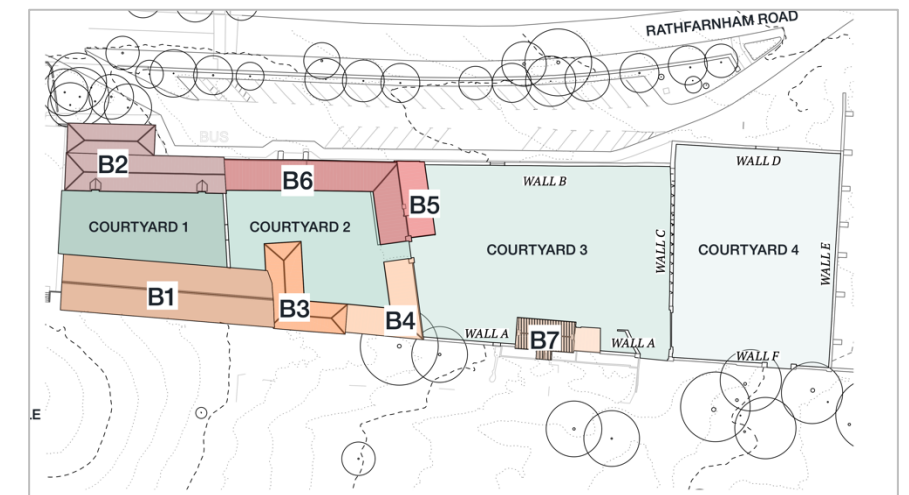
Building B3 is an L-shaped two storey structure in the south-east corner of Courtyard 2. Building 3 shares a party wall with the northernmost end of Cromwell's Fort (B1) and would appear, from map evidence and surviving fabric, to date from the early nineteenth-century. The roof consists of a pitched timber structure and temporary profiled metal roofing. The walls are constructed of calp of various size with infill brick repairs. New pattress plates and tie bars have been fitted to the north and south facades.

### Building B4

Building B4 adjoins B3 to the north and is an L-shaped single storey structure which would appear, from map evidence and surviving fabric, to date from the early nineteenth-century. The north range is rectangular in shape and contains a series of clay troughs arranged in a line of stalls along the northern wall, indicating its former use as a milking byre. The building has a lean-to timber structure finished with a profiled metal covering.

### Building B5

Building B5 is located in the south-west of Courtyard 3 and shares a party wall with Building B6 (Courtyard 2). The building is likely to date from the mid-nineteenth century to the early-twentieth century. The western external wall forms part of the perimeter of the site along Rathfarnham Road. The building incorporates two single storey structures (5A and 5B), both with lean-to roofs. The roofs consist of pitched timber structures, with temporary profiled metal roofing. Building 5(A) is a brick structure with some remnants of external render, similar to what is visible on Building 4. There are three archways along the north façade, facing Courtyard 3 potentially indicating its former use as stables and a blacksmith. Building 5(B) is constructed of brick and masonry, though the wall to the north and the north-east corner have been rebuilt in concrete blockwork.



Overall Layout of Existing Buildings

### Building B6

Building B6 is an L-shaped building, occupying the entire western and north-western corner of Courtyard 2. The east range is long and narrow and occupies the western side of Courtyard 2, with the west facing external wall forming part of the perimeter wall of the site. Internally the floor slopes significantly downwards towards the north range. The north range is rectangular in plan and contains a series of clay troughs arranged in a line of stalls along the northern wall, indicating its former use as a milking byre, similar to Building B4. The roof is finished in a light-weight profiled metal cladding on a mono-pitch timber structure. The east and south facing elevations are built of rubble masonry with brickwork reveals to the openings. The roof structure is particularly low, supported at eaves level along the eastern façade. As result there is limited height internally (approx. 2m).

### Building B7

Building B7 is known as the Seismograph Building. It is a two-storey rectangular house, located in the east of Courtyard 3. A Jesuit priest, a Fr. O'Leary, established the use as a seismograph in or around 1915. This continued in use up to the 1960s.

The eastern entrance to the house, from the parkland, has a doric style porch with entablature and plain pediment. There is a single storey square masonry structure located to the north, build against the gable

wall of the seismograph building. It is similar to buildings B4 and B6 in Courtyard 2. Further north there is an unroofed masonry structure, with gable end wall remaining. The pitched roof is slated. Internally the building consists of an entrance hallway centrally located between a room either side to the north and south, with a similar layout above on the first floor. The space has been altered to accommodate a new stairs, which impinges on the internal layout. In the concrete slab ground floor, a covered, circular opening 400mm wide has been exposed. This contains three timber rods of various sizes and the opening continues for an unknown depth. It may have been associated with the former location of the seismograph which gave the building its name, though its purpose is unclear.

#### **West Perimeter Walls (Wall B and Wall D)**

The west perimeter walls are occupied by Building B2, Building B6 and Building B5, and the freestanding walls of Courtyard 3 and Courtyard 4 (Wall B and Wall D respectively) and are built mostly of stone masonry with brickwork visible where repairs and modifications have been made.

Wall B dates from the early to mid-nineteenth-century and there is cartographic evidence that it supported a continuous structure. There is a large (approx. 3m wide) archway within the wall, finished with brickwork reveals in a toothed pattern. The opening has been closed up with timber sheeting. The stonework to the top of the wall has recently been repaired and is finished with clay ridge tiles along its length.

Blind openings elsewhere along the west perimeter are visible particularly where Buildings 2 and 6 occupy the wall, indicating modifications and former access points.

A portion of Wall D, approx. 3m wide half-way along its length, has been reconstructed with modern concrete blockwork.

Structural Condition as described by engineers CORA Consulting Engineers:

*The west wall of Courtyard 03 has received significant repairs as part of the 2018 works along with restraint by galvanised steel braces, fixed through the wall to pattress plates on the external face of the wall. The general condition of the west wall is fair, the wall tops appear well repaired, but some signs of moss are*

*returning along with mortar loss to the courtyard face near wall top. There is some deflection of the wall top mid-span, eastwards into the courtyard. Careful integration into the proposed new buildings will serve to restrain and weather these walls and their further wellbeing should be integral to the design of those buildings. The previous deflections will need to be incorporated into the new building design.*

#### **East Perimeter Walls**

The east perimeter walls are occupied by Building B1 (Cromwell's Fort), Buildings B3, and B4, Building B7 (Seismograph House), and Walls A, F and D.

Wall A closes off the Courtyard 3 on its eastern side and is occupied in part by the Seismograph House and appears from cartographic evidence to have been built in the early nineteenth century. A structural condition of the wall undertaken by CORA notes that the condition of the wall is serviceable with no excessive deflections.

Wall F contains a large vehicular entrance with gate posts either side, approximately half-way along the length of Courtyard 4. Further along to the north of the eastern perimeter there is a large arched opening. This opening may correspond to the network of pathways associated with the managed farmland known to have existed in in the mid-nineteenth century. A structural condition assessment of the wall notes that the wall is generally in fair condition and localised repairs only are required.

#### **Dividing Wall between Courtyards 3 and Courtyard 4 (Wall C)**

The middle section of Wall C is the remaining vestige of what appears to have been a two-storey farmyard structure. There are three doorway openings at ground level, two of which have been infilled with blockwork, and eight small narrow openings with angled reveals at first floor level. These may have been openings for ventilation of a loft or first floor storage space. Small fragments of glass, noted by the design team during inspection, indicate that the openings were likely glazed at some point.

There is also a large square opening at first floor level directly above the most westerly opening at ground floor. The remains of masonry gable walls are visible at either end of the two-storey section. A single storey

section of wall to the east has been rebuilt in concrete blockwork. Timber lintels above all openings have recently been installed. To the west end of the wall there is vegetation growth along the surface, and loose soil has been banked up at the base of the wall.

Structural Condition as described by CORA Consulting Engineers :

*The tall wall to the north of Courtyard 3 is currently freestanding. In places it is offered some restraint by galvanised steel braces through fixed to pattress plates on the external faces of the walls. The general condition of this north wall to Courtyard 03 is serviceable, there are no excessive deflections, and the wall and its wall top have been recently repaired keeping the worst of the moisture from the wall cores.*

#### **Dividing Wall between Courtyards 1 and 2**

This masonry wall divides Courtyard 1 and Courtyard 2 and has an opening of approx. 2.7m in its centre. The brick arch and portion of wall above the opening were reconstructed during the 2018 works.

#### **North Perimeter Wall (Wall E)**

The north wall is covered by extensive vegetation and is inaccessible due to temporary fencing erected along its length to the north. A series of buttresses are positioned along the north face of the wall.

The structural condition of the walls was assessed by CORA Consulting Engineers, who noted that *'based on deflections seen and the current, now old and beyond service, propping to the north face that this wall is in a very precarious condition. Deflections of up to 240mm over a height of 2m were recorded and it is likely that most of this north wall will require rebuilding.'*

Regarding the west wall of Courtyard 4 (Wall D) the structural condition is such that

*The west wall has also suffered movement, and large sections have been rebuilt in recent years. This wall has a hedge of pleached trees planted very close to its base It is likely that that the northern portion of this west wall will also need to be rebuilt.*



## Development Plan

The statutory land use plan applying to the area is the South Dublin County Development Plan, 2022-2028. The lands around Rathfarnham Castle are zoned OS: *To preserve and provide for open space and recreational amenities.*

Land uses that are listed as ‘permitted in principle’ on OS lands include:

*Allotments, Community Centre, Cultural Use, Open Space, Recreational Facility, Sports Club /Facility*

Land uses that are listed as ‘open for consideration’ are as follows:

*Agriculture, Bed & Breakfast, Camp Site, Car Park, Cemetery, Childcare Facilities, Crematorium, Education, Garden Centre, Guest House, Home Based Economic Activities, Hotel / Hostel, Housing for Older People, Outdoor Entertainment Park, Place of Worship, Public Services, Recycling Facility, Residential, Restaurant / Café, Shop-Local, Stadium, Traveller Accommodation.*

Rathfarnham Castle is included on the Record of Protected Structures (RPS 221). The stable yard and its buildings are within the curtilage of the Castle and are therefore legally part of the Protected Structure.

The Castle is described in the National Inventory of Architectural Heritage (Ref. 11216007) as:

*This imposing Castle is a significant landmark for Rathfarnham and South Dublin built by Adam Loftus c.1583. Although the Castle was extensively remodelled, it retains the plan form and defensive attributes from earlier years as well as much fabric of significance from the later remodellings. Intimately associated with the history of the area, it remains a focal building within the village.*

The Inventory states also that a few ancillary buildings survive as garden and courtyard features.

The County Development Plan includes policies in respect of Built Heritage:

### NCBH19: Protected Structures

Conserve and protect buildings, structures and sites contained in the Record of Protected Structures and carefully consider any proposals for

development that would affect the setting, special character or appearance of a Protected Structure including its historic curtilage, both directly and indirectly

### NCBH19 Objective 1:

To ensure the protection of all structures (or parts, of structures) and their immediate surroundings including the curtilage and attendant grounds of structures identified in the Record of Protected Structures

### NCBH19 Objective 2:

To ensure that all development proposals that affect a Protected Structure and its setting, including proposals to extend, alter or refurbish any Protected Structure, are sympathetic to its special character and integrity and are appropriate in terms of architectural treatment, character, scale and form. All such proposals shall be consistent with the Architectural Heritage Protection Guidelines for Planning Authorities, DAHG (2011 or any superseding documents) including the principles of conservation.

### NCBH19 Objective 3:

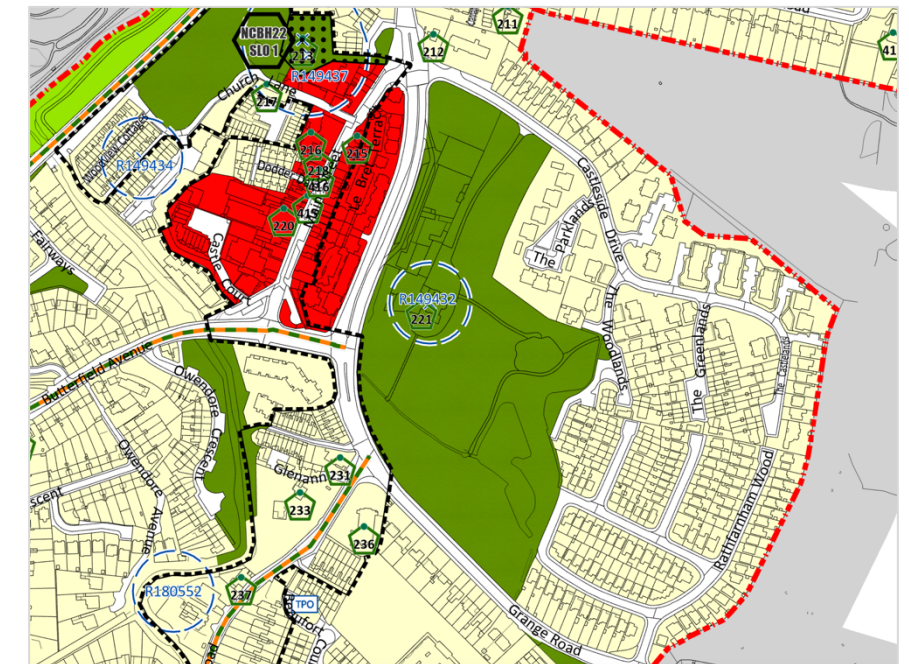
To address dereliction and to welcome, encourage and support the rehabilitation, renovation, appropriate use and sensitive re-use of Protected Structures consistent with RPO 9.30 of the RSES.

### NCBH19 Objective 4:

To support alternative uses for Protected Structures including former institutional sites in order to provide continued security of the heritage value of these buildings, attendant grounds and associated landscape features.

### Rathfarnham Village ACA

Rathfarnham village is identified as an Architectural Conservation Area. The development of the village being closely linked with that of Rathfarnham Castle is noted in the development plan.



Development Plan Zoning Map

## Description of Proposed Development

The Design Statement, by Howley Hayes Cooney Architects, states that South Dublin County Council intends to make Rathfarnham Castle Park more attractive and accessible as a visitor destination, to increase the economic benefit to Rathfarnham village, to improve the public park, and improve the connection between the park, Castle and the village. As part of these objectives, the council wishes to adapt the redundant former yards and outbuildings of Rathfarnham Castle into an economically viable mixture of appropriate public and visitor uses.

The Design Statement outlines an overall strategy for the re-use of the farmyard courtyards and buildings. It states that the courtyards should be preserved and brought back into use for community benefit, providing spaces to gather, socialise and interact with others. Historic boundary walls should be kept relatively intact, to ensure the quality and character of these enclosed spaces is maintained, though new openings could be considered, to improve connectivity with the park and village.

In particular, the residential building (Building B2) and the Seismograph Building (B7) should be retained and refurbished and opportunities to better present these structures should also be explored. Only minimal modification to the facades and roofs of these buildings should be considered, though internally there is scope for alteration.

Cromwell's Fort (B1) is of archaeological, historic and social significance, but little physical historic fabric remains, due to extensive alterations in the past. It is however an importance structure and *should be celebrated* and given prominence within any development schemes. The remaining structures are of lesser interest and, though externally they should be kept relatively intact, there is potential for limited alteration to their facades, to allow them to be brought back into use.

The development will consist of the refurbishment and change of use of the former stable buildings and former council depot yards, to provide mixed-use cultural/arts/cafe/ restaurant uses together with retail use, WC's, storage areas and a switch room.

### Detailed Description:

1.Works to the building to the north of the castle known as Cromwell's Fort (GFA 269m<sup>2</sup>), and its change of use to two multi-purpose event spaces and associated lobby areas.

The proposed works to include:

- i) the removal of a modern flat roof covering and the replacement with a pitched roof with zinc finish and rendered masonry gable-ends;
- ii) the removal of the existing solid floor to the southern internal room and replacement with a new insulated floor slab and the insertion of a new raised floor to the northern room;
- iii) the removal of infill blockwork from existing openings and the provision of new windows and doors to existing openings;
- iv) Installation of new services, partitions and repair and repointing works as required, including application of lime render finish.

2.Works to the existing single storey former stable buildings (GFA 591m<sup>2</sup>) within the existing courtyards to the north of the Castle and change of use to cultural/arts spaces, retail, café/restaurant, public toilets and ancillary lobby, storage and services spaces. The proposed works to include:

- i) the removal of temporary roof coverings and the replacement with slate roof coverings;
- ii) the minor modification of roof profiles above 2no. entrance doorways to provide sufficient head height at entrances;
- iii) the removal of temporary bracing to windows and doors and replacement with new windows and doors to existing openings;
- iv) the insertion of a new opening to the western perimeter wall to provide a new public entrance to the courtyard immediately to the north of the castle, and the closing up of an adjacent existing doorway opening;
- v) The creation of new openings within dividing walls of the existing stable buildings to provide improved connection between the buildings;

- vi) The construction of a new single-storey mono-pitch extension (GFA 83m<sup>2</sup>) to the northern elevation of a former stable building;
- vii) New insulated floor slabs, installation of new services and repair, repointing and lime render works as required.

3.The provision of a new single storey café and restaurant and ancillary support space (area GFA 528m<sup>2</sup>) within the former council depot yards comprising:

- i) The demolition of a section of wall to the north-west to provide access between the proposed restaurant dining area and back of house areas;
- ii) The construction of a single storey mono-pitch structure in the north-west corner including clerestory windows facing north and west along the existing perimeter walls of the site to provide a café/restaurant dining area, and an associated single storey flat-roof structure to the north to provide ancillary support to the café/restaurant, including kitchens, staff and visitor WCs;
- iii) The provision of an internal plant room to the rear;
- iv) The provision of external ancillary support areas including a screened bin store, screened plant enclosure at ground level and screened rooftop plant enclosure;
- v) The provision of two new openings within the existing western perimeter wall to facilitate the insertion of secure entrance gates, to provide staff, deliveries and bin store access to the rear of the ancillary space and bin storage areas;
- vi) The provision of four new openings within the existing western perimeter wall to facilitate the insertion of new glazed window openings to the café/restaurant;
- vii) Repairs and repointing to the existing walls as required.

4.The provision of new, single storey, slated roof structures to the existing structures (GFA 33m<sup>2</sup>) to the north of the building known as the Seismograph Building consisting of:

- i) A secure bike store area and provision of 10no. long term bicycle storage spaces including 1no. enlarged bicycle space for a cargo bike;
- ii) A secure bin storage area for the retail spaces;

5.The demolition and reconstruction of the walls to the north and west of the northernmost former depot yard;

6.The provision of a new car park on part of the Sean Keating garden adjacent to the boundary with Castleside Drive, with entry from the existing Rathfarnham Road car park, including:

- i) the demolition of 2no. existing gate posts and part of the adjacent existing garden wall and railings, and the removal of 14no. existing trees to facilitate the construction of a new pedestrian and vehicular entrance, pedestrian footpath and delivery drop-off area;
- ii) the regrading and relevelling of the existing sunken pond and garden area to provide 54 no. car parking spaces (including 4no. accessible parking spaces and 10 no. EV parking spaces) and 42 no. short-term bicycle parking spaces to the north of the site and associated landscaping;
- i) The reconfiguration of the existing pedestrian entrance gate and new hard and soft landscaping to the north-west corner of the site to facilitate improved pedestrian access;

7.All associated site services, site development works and landscaping comprising:

- i) Removal of temporary cabin structures from the existing former council depot yards and associated site clearances;
- ii) The construction of new gated entrance and railings between Rathfarnham Castle forecourt and the proposed site;
- iii) The removal of 4no. car spaces from the existing Rathfarnham Road car park to provide a new enlarged pavement area adjacent to the entrance to the Café/Restaurant;
- iv) The reallocation of the existing bus set down area to accommodate a universally accessible set down area;
- v) The local regrading of the footpath within the Rathfarnham Road car park along the perimeter wall to the west of the courtyards to provide accessible entrance points to the courtyards;
- vi) The removal of part of southern end of the existing low level boundary wall between the existing car park and Rathfarnham Road to facilitate a new raised table and improved pedestrian crossing point; installation of a new access control gate to the carpark entrance from Rathfarnham Road;

- vii) The regrading and relevelling of the existing surfaces to facilitate universal access throughout the site
- viii) The provision of new hard and soft landscaping to the existing courtyards;
- ix) The provision of new secure entrance gates to the existing openings between the park and courtyards;
- x) The infilling with masonry construction of an existing unused entrance between the northern courtyard and the park to facilitate the regrading of the courtyard.
- xi) Installation of new drainage, attenuation and site services and associated trenching and reinstatement works.
- xii) Installation of new external site lighting to the car parking areas and courtyard spaces;
- xiii) Repairs and repointing of existing structures throughout, as required.

The former council depot yards and former stable buildings fall within the zone of notification for Rathfarnham Castle, a National Monument (RMP DU022-014, Nat.Mon. 628) and a Protected Structure (RPS. 221)

Details of the proposed works are set out in the Design Statement by Howley Hayes Cooney Architects. It is explained that the architectural treatment has been guided by the Burra Charter of ICOMOS (International Council on Monuments and Sites), which requires minimum intervention in buildings of heritage value, with the general aim of doing as little as possible, but as much as is necessary.

The overall architectural strategy, set out in the Design Statement, is to:

- ensure the protection of the built heritage through its repair and preservation,
- improve its setting where possible,
- document and record all repair and intervention,
- restore the buildings with appropriate and active use.

It is proposed to develop a range of appropriate and complementary uses across the outbuildings and yards to open and link the complex with the Castle, park and village. This includes use of the existing buildings as follows:

- Courtyard 1: repurposing Cromwell's Fort into a multi-purpose event space and Building 2 into flexible spaces, which would address the lack of such facilities in the area.
- Courtyard 2: adapting the range of single room depth and single storey former dairy buildings into a mixture of retail, hospitality, storage and public toilets.
- Courtyard 3: Use of the Seismograph House (B7) as a cultural exhibition space, citing its historical significance as Ireland's first seismic observatory. Linking the forge and cart building (B5) with the retail building (B6) in Courtyard 2. Adding new single room depth and single storey lean-to structures containing retail and café/restaurant front of house areas.
- Courtyard 4: New single storey back of house areas for cafe/restaurant to include kitchen, storage, delivery, bins, plant, public wcs and staff changing/wcs. Retain the large outdoor space for a range of flexible public uses to include meanwhile uses, markets, outdoor cinema and events.
- Courtyards: Maximise the opportunities for high quality usable and enjoyable open spaces and public realm. Reuse existing cobbles and other materials found on site to retain the particular and unique characters of each courtyard space.
- Garden: restore the layout of the garden path system evident in the 1865 Ordnance Survey map and set a new carpark extension within a new garden setting. Minimise visual impact from the park and surrounding streets through use of materials and soft landscape.
- Existing carpark: retain existing carpark and upgrade to create new entrance into Courtyard 3.



Overall Proposed Layout



### Courtyard 1

Building B1 (Cromwell's Fort):

Cromwell's Fort will be converted to a multi-purpose event space, which would address the lack of such facilities in the area.

The temporary shallow-pitched fibreglass roof and PVC rainwater goods installed during in the 2018 works are to be removed. A new pitched zinc roof is to be added to Cromwell's Fort in reference to the original slate pitched roof evident in historic photographs. All blocked up openings will be unblocked, non original windows and doors removed, openings made good and ready for new windows and doors. The existing floorboards and floor slab are in poor condition and will be replaced with a new limecrete floor. Repair works to the internal walls will be carried out with lime plaster. The vaulted masonry will be re-plastered with lime plaster to match the existing wickerwork centring as required.

Building B2:

This building will be converted to use as flexible community-related spaces. The existing temporary mezzanine floor structure will be removed to create double height spaces.

The temporary metal clad roofs will be removed and replaced with new cut roof rafters, insulated and finished with slate. Localised masonry repairs and lime mortar pointing will be carried out on the external walls. Repair works to the internal walls will be carried out with lime plaster. The remaining original timber sash windows will be repaired where possible and new slim profile double glazing installed. Blocked up openings will be unblocked, non original windows and doors removed, openings made good and ready for new windows and doors. Localised masonry repairs and lime mortar pointing will be carried out on the external walls. The existing concrete floor slabs will be replaced with a new insulated slab installed at heights for level access. Existing stone slabs, cobbles and clay floor tiles will be carefully removed and stored for possible reuse.

## Courtyard 2

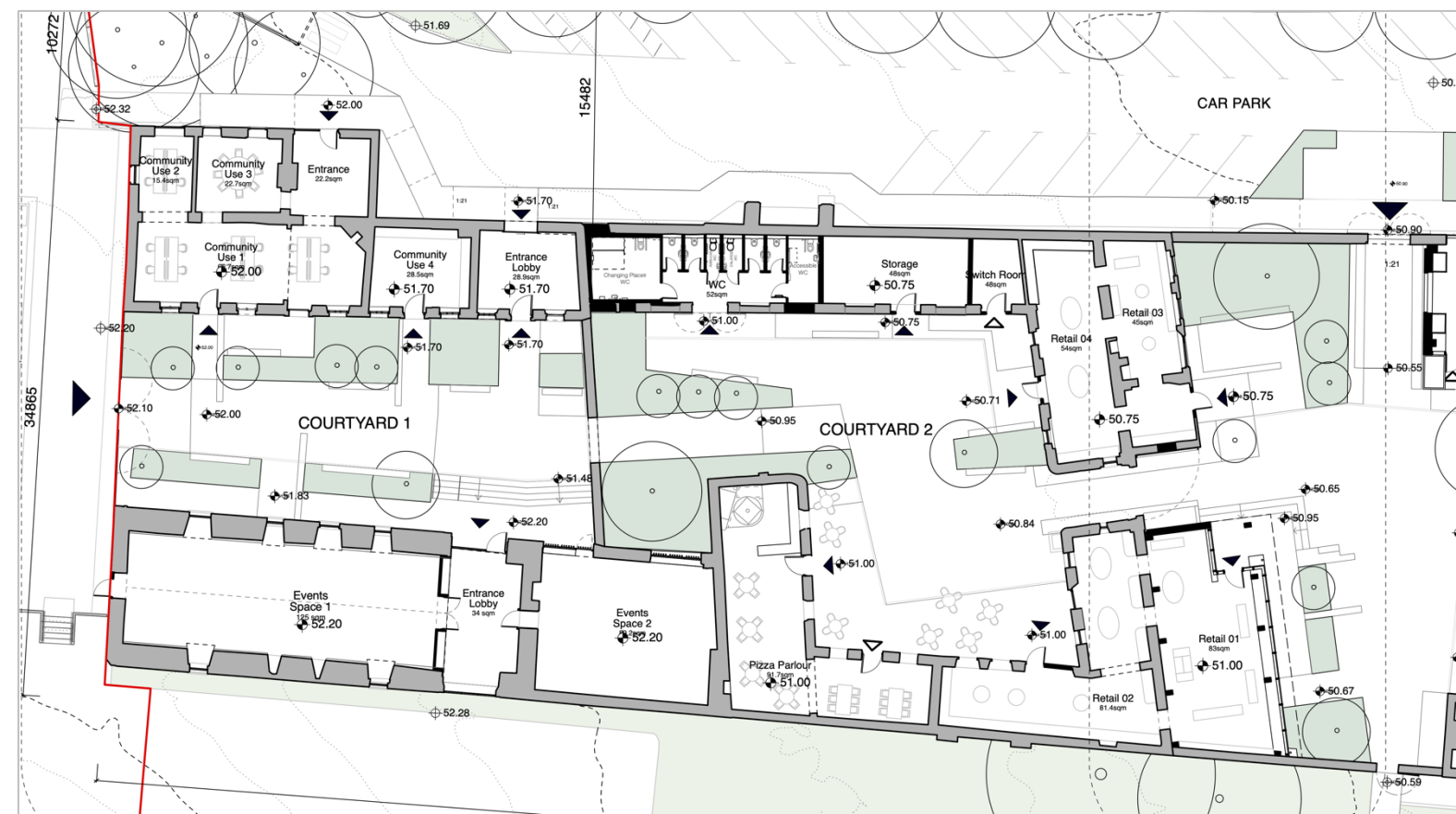
Courtyard 2 contains Buildings B3, B4, B6 (also part of B1). It is intended adapting the range of single room depth and single storey former dairy buildings into a mixture of retail, hospitality, storage and public toilets.

The temporary roofs from the 2018 works will be removed and replaced with new cut roof rafters, insulated and recovered with slate. Localised masonry repairs and lime mortar pointing will be carried out on the external walls. Localised masonry repairs will be carried out on the internal walls where required. All blocked up openings to be unblocked, non original windows and doors removed, openings made good and ready for new windows and doors. Concrete floor slabs will be replaced with a new insulated slab installed at heights for level access. Existing stone slabs, cobbles and clay floor tiles are to be carefully removed and stored for possible reuse.

Building B3: This building is to accommodate a café/restaurant (91.7 m<sup>2</sup>).

Building B4: This building will accommodate a retail unit (81.4 m<sup>2</sup>).

Building B6: This building will accommodate toilets (52 m<sup>2</sup>) storage (48m<sup>2</sup>) and plant. A retail area (54 m<sup>2</sup>) adjoining Building B5 will be linked internally with that building.



*Proposed Layout Courtyards 1 + 2*



### Courtyard 3

Courtyard 3 currently contains two buildings, Building B5 and Building B7 plus ancillary structures (the Seismograph Building). B5 will be a retail area (45 m<sup>2</sup>) linked internally to similar in Building B6, is described above.

Building B7 (Seismograph Building): This is reserved for a future cultural/exhibition use. Ancillary structures adjoining will accommodate bin storage and bicycle parking.

Courtyard 3 contains evidence of earlier structures, as also confirmed on historic maps. It is proposed to construct a new, single storey building of 83 m<sup>2</sup> as a retail unit adjoining and partly integrated with Building B4. It is also proposed to construct a single storey restaurant/café of 277 m<sup>2</sup> in an L-shape layout. This will take the form of a lean-to structure built up to the western and northern walls of the courtyard. The main pedestrian access from the existing car park will be located immediately adjoining.

### Courtyard 4

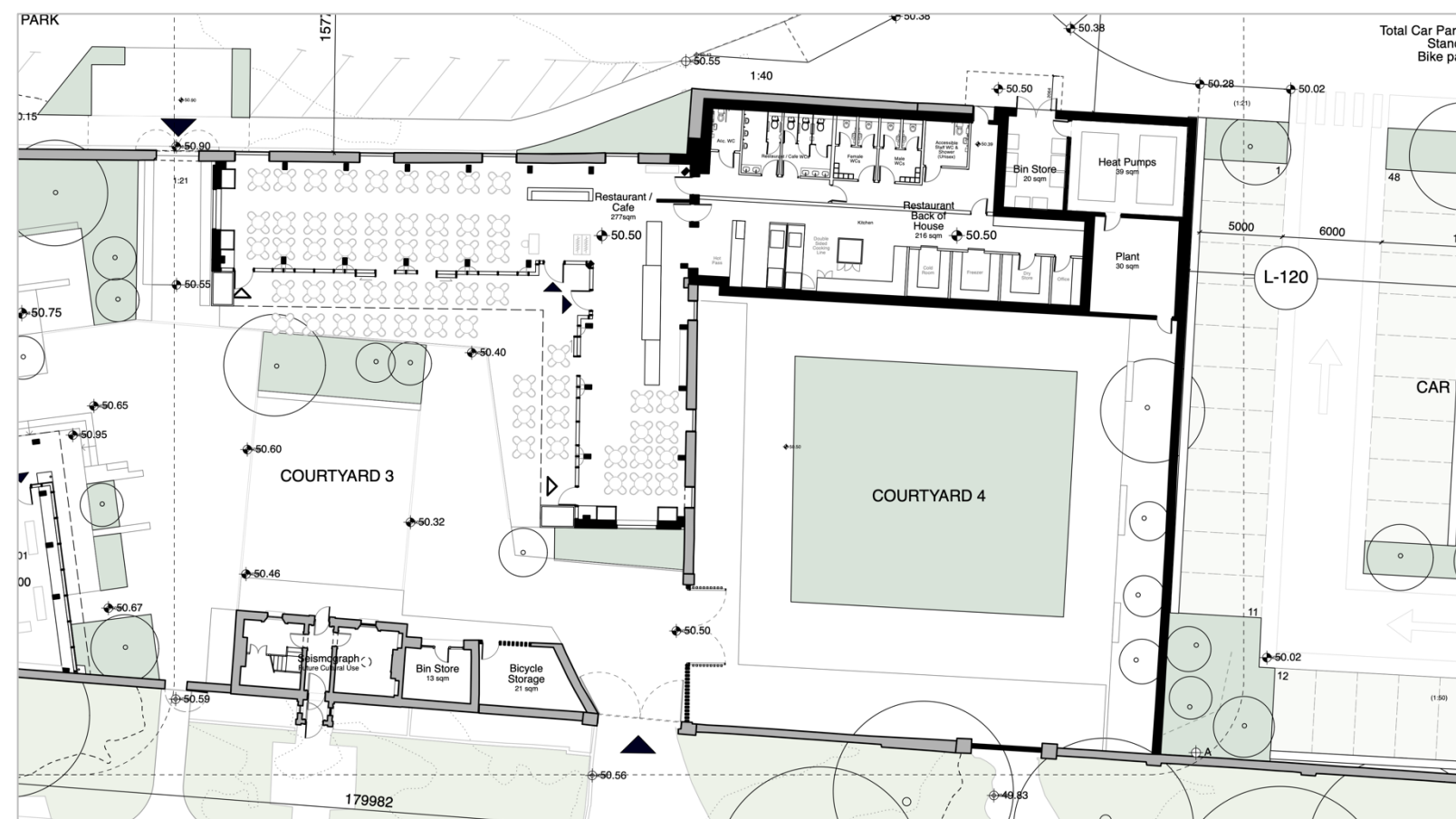
Courtyard No.4 currently contains no buildings and has a concrete floor slab. It is proposed to provide back-of-house facilities to serve the new restaurant/café. The main facilities will be in a 216 m<sup>2</sup> building to be constructed adjoining the western wall of the courtyard. The building will have a flat roof, incorporating SuDS measures in the form of a “green roof”. Adjoining the back-of-house building it is proposed to provide bin storage (20 m<sup>2</sup>), heat pumps (39 m<sup>2</sup>) and other plant (30 m<sup>2</sup>)

The remaining area of Courtyard 4 will be landscaped and planted as an amenity area.

### Garden Area north of Courtyards

The Sean Keating garden will be regraded and relevelled, including infilling of the existing sunken pond. The area will be laid out to provide 54 no. car parking spaces (including 4no. accessible parking spaces and 10 no. EV parking spaces) and 42 no. short-term bicycle parking spaces the remaining area will be landscaped and laid out as a small park.

The existing pedestrian entrance gate to the north-west corner of the site will be reconfigured to facilitate improved pedestrian access.



Proposed Layout Courtyards 3 + 4

Architectural Heritage

Rathfarnham Castle is a Protected Structure (RPS 221), which protection extends to the buildings in its curtilage. The Design Statement by the architects, Howley Hayes Cooney, Grade 1 Conservation Architects, examines the architectural heritage value of the farmyard complex in considerable detail. The conclusion is summarised as follows:

*The surviving stable and yards at Rathfarnham Castle now sit within a much-altered landscape. Once part of a large estate, which was established in the late-sixteenth century, Rathfarnham Castle’s demesne has suffered a slow, inexorable, breaking up and decline throughout the nineteenth and twentieth centuries. The development of the golf course, the incipient creep of housing in and around the castle and the construction of the by-pass has fundamentally changed the character of the Castle’s setting. In recent years the construction of the Sean Keating Garden, situated north of the stables, has resulted in further loss of historic landscape. The stable yards complex can be said collectively to be of medium or regional significance, though “Cromwell’s Fort” which may date to the sixteenth century is of higher significance because of its age, rarity and possible former function. It is the most important structure in the complex, followed by the two residential buildings. As a collective set of buildings, comprising of four yards, the complex is of higher significance when considered within the wider context of the Castle demesne and Rathfarnham village. Its connection to these entities should be maintained and strengthened.*

The essential point of the conclusion by Howley Hayes Cooney is that the stable yards complex of buildings is collectively of *medium* significance. It is only when taken in the context of the Castle demesne and Rathfarnham village that this complex attains a higher rating.

The impact of the proposed development on architectural heritage, as set out in the Design Statement, concludes:

*The proposals will have a moderate, positive impact on Rathfarnham Castle, improving the views from this monument, as the semi-derelict stable yard comes back to life and is fully conserved. When viewed from the rooms within Castle the new interventions will be subtle and of appropriate scale, and are placed some distance away in Courtyards 3 and 4. Views from*

*the stable yard over the top of Cromwell’s Fort to the castle will now more closely resemble the nineteenth century views, and the most important view - from the park path, along the eastern edge of the stables complex - will be unaltered. The view from the existing carpark to the castle will now contain the café roof, peeping over the wall, and this is considered acceptable, as Cromwell’s Fort already obscures the view of castle behind the café. This view is also not a historically important view of the castle.*

*The landscape works will also complement and enhance the stables and yards and will have a positive influence and low impact on the place and they will constitute sustainable interventions that will improve and protect the condition of the protected structures into the future.*

*Overall the impact of the design proposals, which bring many historic elements on site back into use, should be considered to have a positive impact on the architectural heritage of the stable yard site. Though interventions are required to ensure the protected structures can be brought into public use, they have been well considered and on balance the impact of these alterations is considered to be acceptable.*

It is clear from the foregoing that the impact of the proposed development, in terms of architectural heritage, will be positive, permanent and moderate, but not significant.

Archaeology

Rathfarnham Castle is a Protected Structure (RPS 221), a Recorded Monument (RMP DU022-014) and a National Monument (No. 628). Archaeological monitoring and metal detection were carried out during the course of site investigations at the farmyard complex, conducted over two phases in November 2024 and January 2025.

As set out in the report by IAC Archaeology, nothing of archaeological significance was identified during the investigations. IAC further state that it is clear from the results and from analysis of the historic mapping, that the farmyard complex has been subject to ongoing development

throughout its lifetime. Further archaeological monitoring will be required as the project develops through the construction stages.

Ecology

The site at Rathfarnham Castle is not within, or in close proximity to, any designated sites of natural heritage significance. The *Dodder Valley Proposed Natural Heritage Area* (pNHA: 000991) is located a little over 3km to the west of the Castle. Further away are several Natura 2000 sites - Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), designated under the Habitats Directive and the Birds Directive, respectively. These are set out in the table below, including the approximate distance from Rathfarnham Castle.

A screening of the project for Appropriate Assessment, under the provisions of the Habitats Directive, has been carried out by *Altamar Marine and Environmental Consultants*. *Altamar* state that the screening has put forward information to reach a conclusion that the proposed development, individually or in combination with other plans and projects, would not be likely to have a significant effect on any Natura 2000 site.

Site Code	Natura 2000 Site	Distance
Special Areas of Conservation		
IE000210	South Dublin Bay SAC	5.5 km
IE001209	Glenasmole Valley SAC	7.3 km
IE002122	Wicklow Mountains SAC	6.8 km
IE000206	North Dublin Bay SAC	9.6 km
IE000725	Knocksink Wood SAC	10.8 km
IE000713	Ballyman Glen SAC	12.8 km
IE003000	Rockabill to Dalkey Island SAC	12.9 km
IE000202	Howth Head SAC	14.6 km
IE000199	Baldoyle Bay SAC	14.9 km

Special Protection Areas		
IE0004024	South Dublin Bay and River Tolka Estuary SPA	5.7 km
IE0004040	Wicklow Mountains SPA	6.9 km
IE0004006	North Bull Island SPA	9.6 km
IE004236	North-West Irish Sea SPA	10.2 km
IE0004172	Dalkey Islands SPA	12.8 km
IE0004016	Baldoye Bay SPA	14.9 km

*Proximity to designated Natura 2000 Sites (Altamar)*

In addition, Altamar Marine and Environmental Consultants have compiled an *Ecological Impact Assessment* report in respect of the proposed development at Rathfarnham Castle.

The EcIA notes that the subject site has a diverse number of habitats. The most common habitats include amenity grassland, parkland, built land, stonewall, a small artificial pond, flowerbeds, treelines and a small area of scrub. There were many mature standalone trees. Where there are clusters of these trees together with an amenity grassland ground cover, there areas have been classified as scattered trees and parkland.

No rare or plant species of conservation value were noted during the field assessment. No invasive species listed in Articles 49 & 50 of the Habitats Directive (2011) were noted on site. No signs of terrestrial mammals of conservation importance were noted on site.

The site has been surveyed for bats by *Altamar Marine and Environmental Consultants*, on 9th and 20th of May 2024 (Appendix I to EcIA). A bat emergent and detector survey was carried out. Trees on site were examined for bat roosting potential. This identified no bat roosts in any of the existing buildings or trees on site trees or tree lines. Bats were noted foraging along the woodland to the east outside of the site boundary. Three bat species (Leisler's bat (*Nyctalus leisleri*)), soprano pipistrelle (*Pipistrellus pygmaeus*) and common pipistrelle (*Pipistrellus pipistrellus*) were noted on site.

A lighting plan was prepared to provide a sensitive lighting plan to reduce the potential impact on bat species. Lighting on site will be restricted to the development area and no lighting is proposed in the vicinity of trees of high roosting potential. A derogation licence is not required for the proposed development. It is proposed that 3 bat boxes be installed. *Altamar* state that, due to the potential minor loss of foraging area where buildings are to be constructed and increased lighting on site, the residual impact of the proposed development in relation to bats will be minor adverse long term not significant.

Altamar conclude that the construction and operational mitigation proposed for the proposed development satisfactorily addresses the potential impacts on the sensitive receptors through the application of standard construction and operational phase controls. The overall effect of the proposed development will result in a long term, minor, adverse and not significant residual impact on the ecology of the area. This is primarily as a result of the loss of terrestrial habitats on site, supported by the creation of additional biodiversity features including sensitive landscaping and lighting strategy.

### Landscaping

The Design Rationale – Landscape Architecture, by DFLA, sets out a strategy for the landscaping of the site, including responding to the potential range of functions in each of the courtyard spaces. This is further developed with respect to the use of a range of materials.

### Transportation and Traffic

NRB Consulting Engineers have carried out an analysis of the local road network, aided by survey work, to establish the capacity and safety of this in relation to the proposed development. This is shown to be satisfactory as described in the *Traffic & Transport Assessment Report*. The assessment notes that the proposal is a relatively small development in traffic generation terms. It is concluded that there are no adverse or significant traffic/transportation capacity or operational issues associated with the proposed development.

A *Planning Stage Mobility Management Plan* is included with the said report. This sets out the parameters for a more detailed plan to be undertaken when the project has been advanced. It focuses on provision

of alternative modes of travel, including walking, cycling and public transport.

### Services

The engineering drawings and the report titled *Water Supply and Wastewater Management Plan & Flood Risk Assessment*, by CORA Consulting Engineers, sets out proposals for drainage and water supply. There is an existing foul sewer located in courtyard 04 which connects to an Irish Water sewer on Castleside Drive. CORA Drawing no. C0003 shows the proposed foul drainage which is to connect to this sewer. The water supply will be taken from the Uisce Éireann existing watermain located to the east of the site. In order to comply with current Building Regulations a new fire hydrant is required. The water supply layout is shown on CORA drawing C0004.

As set out in the *Stormwater Management Plan*, by CORA, surface water is to be treated using nature-based solutions as far as possible. The new building in Courtyard 4 will have a green roof. It is proposed to employ attenuation tanks to serve the courtyards and the new parking area. The subsequent discharge is to be connected to the existing surface water network. Measures to deal with surface water runoff during construction are outlined in the *Preliminary Construction and Environmental Management Plan*.

### Flood Risk

CORA have examined the potential for flooding, including consideration of the flood zones identified in the County Development Plan. There is no record of flooding on the site and it is not located in a flood zone. Therefore, it is concluded that there is no flood risk on the site.

### Planning Permissions

The local area is one of mature suburban development. Recently permitted developments in the immediate area are for relatively small scale projects. These are particularly in respect of minor residential or educational developments:

- Reg. Ref. SD15A/0070: single storey classroom extension St. Mary's Boys National School, Grange Road.

- Reg. Ref. SD20A/0296: demolition of existing school buildings and portacabins; construction of new 3,833sq.m part 3-, 2-, and 1-storey 21 classroom primary school building, Loreto Primary School, Grange Road, Rathfarnham
- Reg. Ref. S95A/0014: Construction of 84 number mixed apartments/townhouses and 10 small shop units in 3 and 4 storey buildings. A permission for a substantial residential was granted on the lands on the opposite side of the bypass road in 1995 and has since been built.
- ABP 307746-20: Approval under Section 177AE of the Planning and Development Act, 2000, as amended, granted in 2020 by An Bord Pleanála to DLR County Council in respect of flood defence works to the Whitechurch Stream, a tributary of the Owndoherty River, in turn a tributary of the River Dodder.

There are two permissions in respect of works to the Castle :

- Ref. SD17A/0093: Works in the basement of the protected structure etc.
- Reg. Ref. SD09A/0133: The provision of a new lift and staircase in the southwest tower, toilet facilities, fire safety works etc.

Part 8 projects include:

- Reg. Ref. SD078/0001: A Part 8 development by the Council for a playground in the Castle Park was approved.
- Reg. Ref. SD158/0003: More recently in 2015, a Part 8 proposal was approved by the Council per in respect of a new plaza and pedestrian crossing comprising alterations and improvements to paving, kerbing, car-parking, trees, public lighting, bollards, bus stop, dual-carriageway median strip and right-turn lane at Rathfarnham Road, between the dual carriageway and the existing forecourt, tearooms and former stables of Rathfarnham Castle, and between the junctions of Butterfield Avenue and Rathfarnham Road and Castleside Drive and Rathfarnham Road.



## Environmental Impact Assessment

European Union Directive 2011/92/EU, as amended by Directive 2014/52/EU, *on assessment of the effects of certain public and private projects on the environment* is commonly known as the Environmental Impact Assessment (EIA) Directive. The EIA Directive sets out classes of projects, which are likely to have significant effects on the environment and for which, therefore, Environmental Impact Assessment (EIA) is obligatory (Annex I) or for which EIA may be required (Annex II).

Determination of whether a project in Annex II is likely to have significant effects on the environment, and therefore requires EIA, may be by way of application of thresholds, or on a case by case basis, or a combination of both methods. Criteria to determine, on a case by case basis, whether a project of a type listed at Annex II is likely to have significant effects on the environment and should be subject to EIA, are set out at Annex III to the Directive and the information to be provided in this regard to the relevant development consent authority, by the developer, is set out at Annex IIA.

The provisions of the said Annexes to the Directive are transposed into Irish law for the purposes of planning and development primarily per the Planning and Development Regulations, 2001, as amended.<sup>1</sup> Reflecting Annex II of the Directive, the Irish Regulations, at Schedule 5, Part 2, set out the categories of development (projects) for which EIA may be required, depending on their likely significant environmental impacts. Thresholds, generally related to scale or size, are set out in the said Schedule 5, Part 2, of the Regulations, above which EIA is mandatory and below which EIA may be required (i.e. sub-threshold developments). A definition of sub-threshold development is set out at Article 92 of the said Regulations:

“ ‘sub-threshold development’ means development of a type set out in Part 2 of Schedule 5 which does not equal or exceed, as the case may be, a quantity, area or other limit specified in that Schedule in respect of the relevant class of development;”

Criteria to determine on a case by case basis whether sub-threshold development listed in Part 2, Schedule 5, of the Planning and

Development Regulations, 2001, as amended, should be subject to EIA are set out in Schedule 7 of the Regulations (corresponding to Annex III of the Directive). Schedule 7A of the Regulations sets out the categories of information required in order for the planning authority to make such determination (corresponding to Annex IIA of the Directive).

This EIA screening report addresses the matters set out in Schedules 7 and 7A to the Planning and Development Regulations, 2001, as amended, and has regard to guidance contained in:

- *Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report (Directive 2011/92/EU as amended by 2014/52/EU)*, 2017, Commission of the European Union.
- *Environmental Impact Assessment of Projects: Guidance on Screening (Directive 2011/92/EU as amended by 2014/52/EU)*, 2017, Commission of the European Union.
- *Interpretation of definitions of project categories of Annex I and Annex II of the EIA Directive*, 2015, Commission of the European Union.
- *Guidelines on the information to be contained in Environmental Impact Assessment Reports*, EPA, 2022.
- *Environmental Impact Assessment Screening, OPR Practice Note PN02*, 2021, Office of the Planning Regulator.
- *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment*, 2018, Department of Housing, Planning and Local Government.

## Screening for Environmental Impact Assessment

The Planning and Development Regulations, 2001, as amended, Schedule 5, Part 2, set out the following classes of project, which are considered relevant in relation to EIA to the proposed development at at the Stables and Courtyards of Rathfarnham Castle and the adjoining Sean Keating Garden, Grange Road/Rathfarnham Road, Dublin14:

10. Infrastructure projects –

(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).’

14. Works of Demolition

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.

15. Any project listed in this Part which does not exceed a quantity, area or other limit specified in this Part in respect of the relevant class of development but which would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.

The proposed development at the Stables and Courtyards of Rathfarnham Castle and the adjoining Sean Keating Garden, Grange Road/Rathfarnham Road, Dublin14 is a project of a type specified at 10(b)(iv) of Schedule 5, Part 2, of the Regulations, but is greatly sub-threshold. The site may be considered to be within a wider built-up area, notwithstanding its location within the remaining demesne of the Castle. But at 1.1725 ha it is significantly below the threshold of 10 hectares. In any case it is also below the 2ha threshold for development in a business district.

In relation to sub-threshold projects coming *prima facie* within the scope of class 10(b)(iv), class 14, or class 15, the relevant consideration is

<sup>1</sup> A new Planning and Development Act was enacted in 2024, but the relevant sections and associated Regulations will not be commenced for some months.

whether the proposed development is likely to have significant effects on the environment, as assessed in accordance with the criteria set out at Schedule 7 of the Regulations and using the information required in accordance with Schedule 7A.

**Schedule 7A Information**

Schedule 7A of the Planning and Development Regulations, 2001, as amended, sets out the information to be provided by the applicant to enable the planning authority to screen sub-threshold development for EIA. This information is set out above, in the sections describing the site and the proposed development, and below in the comments in the table applying the Schedule 7 criteria.

Schedule 7A requires the following information:

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

**Schedule 7 Criteria**

The criteria contained in Schedule 7 of the Planning and Development Regulations, 2001, as amended, have informed this Environmental Impact Assessment Screening Report. The text of Schedule 7 is repeated in Appendix II to this report.

**Application of Schedule 7 Criteria**

The criteria set out at Schedule 7 fall within three main headings:

- 1. Characteristics of the development
- 2. Location of the development
- 3. Types and characteristics of potential impacts

These are set out in the table below with relevant comment. The application of the Schedule 7 criteria below takes account of the environmental factors set out in at Section 171A of the Planning and Development Act, 2000, as amended, and also Schedule 6(2)(d) of the Planning and Development Regulations,2001, as amended. These environmental factors are:  
(I) population and human health;  
(II) biodiversity, with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive;  
(III) land, soil, water, air and climate;  
(IV) material assets, cultural heritage and the landscape;  
(V) the interaction between the factors mentioned in clauses (I) to (IV)

SCHEDULE 7 CRITERIA	Comment
1. Characteristics of the Development:  The characteristics of proposed development, in particular -	
a) the size and design of the whole of the proposed development	The proposed development at the Stables and Courtyards of Rathfarnham Castle and the adjoining Sean Keating Garden, is of modest scale. It will have a floor area of 1,520 m <sup>2</sup> (both existing and proposed) compared to the existing 873 m <sup>2</sup> . The overall site area is 1.1725 ha. The courtyard complex contains four walled courtyards, stretching northwards from the rear of the Castle, with a combined area of 4,586 m <sup>2</sup> . The proposed development entails reinstatement of the existing buildings, with new uses, and some new structures, which are designed to harmonise with the existing pattern of development in scale and layout, located within the existing boundary walls of the courtyard environment. A highly conservative approach has been taken to demolition which is kept to the minimum.
b) cumulation with other existing development 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 development now proposed at the Stables and Courtyards of Rathfarnham Castle and the adjoining Sean Keating Garden will constitute a relatively small intervention.  Over recent years, several other permissions were granted for small scale development in the general vicinity of the Stables and Courtyards of Rathfarnham Castle and the adjoining Sean Keating Garden. These developments have little cumulative effect taken in conjunction with the proposed development.
c) the nature of any associated demolition works	Demolition works to the Stables and Courtyards of Rathfarnham Castle are extremely modest, as described in this report, and confined to those essential to

	<p>the reuse of the buildings e.g. replacement of temporary roofs. The proposed intervention to the Sean Keating Garden is more extensive, requiring regrading of the site. But this area is itself not very large at slightly more than 0.3ha.</p> <p>Archaeological monitoring was conducted out in February 2025 during site investigations, which were conducted over two phases in November 2024 and January 2025. Further archaeological monitoring will be required as the project develops through the construction stages.</p>
d) the use of natural resources, in particular land, soil, water and biodiversity	<p>The development is concentrated on the Stables and Courtyards constitute a brownfield site and no significant natural resources will be used. Site development works will entail some reduction in levels in the proposed car park area immediately to the north of the courtyards. This will require removal of up to c.3,000m<sup>3</sup> of soil, including for SuDS related works. But this material will be carefully stockpiled for re-use in the landscaping works to both the new car park and to Courtyard 4. In particular, infilling the pond/sunken garden areas will minimise the amount of excavation. Relatively small volumes of water will be required during both construction and operation of the project. The courtyards are not of biodiversity significance.</p>
e) the production of waste	<p>Waste generated during demolition and construction works will be typical of small scale urban development. The disposal of waste generated during construction, including bulk excavation, as set out in the <i>Preliminary Construction and Environmental Management Plan</i> by CORA Consulting Engineers, will be managed to maximise the environmental and development benefits from the use of surplus materials and to reduce any</p>

	<p>adverse effects of disposal. In general, the principle of waste management hierarchy, which favours waste minimisation, re-use material and recycle over disposal to landfill will be favoured.</p> <p>Waste during the operational phase will be largely domestic type municipal waste of modest volume.</p>
f) pollution and nuisances	<p>The demolition and construction phases of the development are likely to generate localised, short term noise, vibration and dust emissions. These will not be significant and will be mitigated in accordance with standard practice for construction sites, as set out in the <i>Preliminary Construction and Environmental Management Plan</i> by CORA Consulting Engineers. Standard construction measures to control surface water run-off during construction are set out in that document. During the operational phase, the development is not likely to generate any emissions of consequence.</p>
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	<p>The <i>Water Supply and Wastewater Management Plan &amp; Flood Risk Assessment</i>, by CORA Consulting Engineers, notes that the site of the proposed development is outside the areas liable to flooding and states that there is no risk of such. The site at Rathfarnham Castle is c.300m from the flood plain of the River Dodder in a relatively elevated location.</p> <p>In the Dublin area, there are clusters of Comah/Seveso sites in the port area and in industrial zones such as in Mulhuddart. These are shown on the HAS website. In addition, Table 9.4 of the South Dublin County Development Plan, 2022-2028, shows the location of Comah/Seveso establishments in the County. There are five such, of which two are Upper Tier Establishments and three are Lower Tier.</p>

	<p>Rathfarnham Castle is not in the vicinity of any of these sites with a particular risk of accident or disaster (e.g. Comah/Seveso type establishment). Therefore, there is no significant risk to the site of the proposed development at the Castle stables and courtyards from a major accident at such Comah/Seveso sites</p>
h) the risks to human health (for example, due to water contamination or air pollution)	<p>Having regard to the nature and location of the proposed development, there are no risks to human health.</p>
2. Location of the proposed development	<p>The environmental sensitivity of geographical areas likely to be affected by the proposed development, with particular regard to —</p>
(a) the existing and approved land use	<p>The Stables and Courtyards of Rathfarnham Castle are now effectively disused. The adjoining Sean Keating Garden serves as a small public open space, but is not intensively used as such, as noted in the Design Statement by the architects (Howley Hayes Cooney). This states that the garden is well maintained by the Council, but has low footfall and dwell time and that the design of the garden does not have any relationship to the historical layers of the site.</p> <p>The lands are zoned OS in the South Dublin County Development Plan, 2022-2028, where the uses now proposed are either permissible in principle or open for consideration.</p>
(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground	<p>Having regard to the brownfield nature of most of the site of the development, natural resources are limited. The wider parkland demesne lands are generally not affected by the proposed development. The underlying aquifer is classed as poorly productive bedrock. It is classed as of Low Vulnerability (GSI)</p>
(c) the absorption capacity of the natural environment,	

paying particular attention to the following areas:	
(i) wetlands, riparian areas, river mouths	In respect of riparian areas and river mouths, the River Dodder is approximately 300m west of the Castle and courtyards and discharges into the Liffey near Ringsend, more than 12km to the north-east of the site at Rathfarnham. (For the purposes of the Water Framework Directive, the wider area is located within the <i>Liffey and Dublin Bay</i> WFD catchment. Rathfarnham is within the <i>Dodder Sub-catchment</i> area). There will be no significant effect from the proposed development on the Dodder. The proposed development incorporates appropriate standard construction methodology and SuDS in relation to surface water drainage, as set out in the <i>Preliminary Construction and Environmental Management Plan</i> and in the <i>Stormwater Management Plan</i> by CORA Consulting Engineers.
(ii) coastal zones and the marine environment	Not applicable
(iii) mountain and forest areas	Not applicable
(iv) nature reserves and parks	The Castle Stables and Courtyards adjoin the parkland of the Castle on the eastern side and part of this parkland is included within the development site boundaries. However, the parkland is largely unaffected by the proposed development.
(v) areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive	There are no Natura 2000 sites within the general area in which the site is located. About 6-7km to the east of Rathfarnham Castle are the coastal Natura 2000 sites of the Dublin Bay area [South Dublin Bay SAC (No. 000210), South Dublin Bay and Tolka River SPA (No.004024), North Dublin Bay SAC (No.000206) and North Bull Island SPA (004006) ]. The nearest Natura 2000 site is South Dublin Bay SAC, which is about 5.5km to the north-east. There is a very weak hydrological connection to the two Dublin Bay SACs by way of surface water courses, insofar

	as the site at Rathfarnham Castle is within the catchment of the River Dodder located at approximately 360m to the west. The nearest SPA is South Dublin Bay and River Tolka Estuary SPA, approximately 5.7 km from the proposed development site. There is a direct hydrological connection to Natura 2000 sites via the surface water network. However, surface water drainage during operation will be subjected to onsite attenuation prior to entering the surface water network. There is an indirect hydrological pathway to marine-based Natura 2000 sites in Dublin Bay via the proposed foul wastewater drainage network. Foul wastewater from the proposed development will be directed to an existing foul sewerage system. Prior to being discharged to Dublin Bay, wastewater will be sent to Ringsend Wastewater Treatment Plant (WwTP) for treatment.
	The Wicklow Mountains SAC (002122) and SPA (004040) are to the south of Rathfarnham, about 7km from the Castle. There is no pathway in ecological terms between these Natura sites and the Rathfarnham Castle area.
(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	The River Dodder is classed by the EPA as of <i>moderate</i> status and is deemed to be <i>at risk</i> in terms of the Water Framework Directive.
(vii) densely populated areas	Given the nature and scale of the proposed development, it will not significantly affect population density. Census 2022 results show the Rathfarnham ED had a population density of 4,678 persons per km <sup>2</sup> compared with Dublin City with 5,046 per km <sup>2</sup> .
(viii) landscapes and sites of historical, cultural or archaeological significance	Rathfarnham Castle is a Protected Structure (RPS 221), a Recorded Monument (RMP

	DU022-014) and a National Monument (No. 628). The Castle is of National importance, per the National Inventory of Architectural Heritage. The farmyards and stables of Rathfarnham Castle constitute the core of the proposed development. The proposed development is designed to retain and enhance the special interest of the courtyards and their buildings and not detract from their special interest. The assessment of the farmyard complex in the Design Statement by Howley Hayes Cooney (Grade I Conservation Architects) states that Rathfarnham Castle demesne has suffered a slow, inexorable, break up and decline and that the surviving stable and yards at Rathfarnham Castle now sit within a much-altered landscape. The Architects rate the stable yards complex as of medium or regional heritage ranking. As a collective set of buildings, comprising of four yards, the complex is of higher ranking if considered within the wider context of the Castle demesne and Rathfarnham village.
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—	Note: The factors cited at Section 171A of the Act are: (I) <i>population and human health</i> ; (II) <i>biodiversity, with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive</i> ; (III) <i>land, soil, water, air and climate</i> ; (IV) <i>material assets, cultural heritage and the landscape</i> ; (V) <i>the interaction between the factors mentioned in clauses (I) to (IV)</i>
a) the magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected)	The proposed development at the Stables and Courtyards of Rathfarnham Castle and the adjoining Sean Keating Garden is of modest scale. The overall site area is 1,1725 m <sup>2</sup> and the courtyard complex has a combined area of 4,586 m <sup>2</sup> . The



	<p>development will have a floor area of 1,520 m<sup>2</sup> (both existing and proposed) compared to the existing 873 m<sup>2</sup>.</p> <p>A screening for Appropriate Assessment, under the provisions of the Habitats Directive, by ecologists <i>Altemar Marine and Environmental Consultants</i>, has identified those European / Natura 2000 sites of particular relevance. The screening has put forward information to reach a conclusion that the proposed development, individually or in combination with other plans and projects, would not be likely to have a significant effect on any Natura 2000 site. Having regard to the nature, scale and location of the proposed development, it is considered that there will be no significant effects on a wider geographical area or on the population either during the construction phase or the operational phase. It can also be concluded there will be no significant impacts on natural heritage, land, soil, water, air and climate.</p>
b) the nature of the impact	<p>The impact of the proposed development on cultural heritage will be generally positive, if limited. Construction impacts will be temporary to short term, of low intensity and complexity.</p> <p>Impacts will not be significant, having regard to their nature and scale and to the mitigation measures set out in the <i>Preliminary Construction and Environmental Management Plan</i> and the report by Irish Archaeology Consultancy Ltd. There will be a positive, long term impact on <i>material assets, cultural heritage and the landscape</i>, insofar as the proposed development will entail restoration and reuse of structures forming part of a Protected Structure, in accordance with good</p>

	conservation practice, as described in the <i>Design Statement</i> , by Howley Hayes Cooney Architects. The impact on the setting of the Castle will be limited, particularly as views into and out of the courtyards are limited by the enclosing high walls. The impact, although positive, long term and not reversible, will not be significant, having regard to the scale of the proposed development.
c) the transboundary nature of the impact	There will be no transboundary effects.
d) the intensity and complexity of the impact	Construction impacts will be temporary to short term, of low intensity and complexity and will not be significant. Operational impacts will be positive and not significant.
e) the probability of the impact	Temporary to short term construction impacts are likely but will not be significant.
f) the expected onset, duration, frequency and reversibility of the impact	Construction impacts will be evident from commencement of the development, will last through the demolition and construction period (two years), will be frequent throughout this period and will not be reversible. Upon commencement of the operational phase of the development, impacts will be long term to permanent, non-reversible and not significant.
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	Having regard to the nature, scale and location of the proposed development, when considered in combination with other existing or permitted development, any cumulative effects arising from the proposed development will not be significant. Any new development proposed in the surrounding area would be accompanied by an EIA, or EIA Screening as required.
h) the possibility of effectively reducing the impact	Mitigation of archaeological impacts is set out in the report by Irish Archaeology Consultancy Ltd. Construction impact mitigation is set out in the relevant Preliminary Construction Environmental Management Plan report by CORA Consulting Engineers.

## Conclusion

The examination of the proposed development against the criteria contained in Schedule 7 of the Planning and Development Regulations, 2001, as amended, is set out in the table above. Other relevant assessments of the effects on the environment of the proposed development have also been taken into account (Appendix I to this report).

The proposed development is sub-threshold in relation to the criteria and thresholds set out in Schedule 5, Part 2, of the Planning and Development Regulations, 2001, as amended. It is concluded having regard to the nature, scale and location of the subject site, that the proposed development, by itself or in combination with other projects, is not likely to have significant effects on the environment (direct, indirect or cumulatively with other development). Accordingly, it is considered that an Environmental Impact Assessment is not required.

**Appendix I : Other Relevant Assessments**  
**Other Relevant Assessments Taken into Account in EIA Screening Report**

Directive	Assessment carried out	Conclusion
Directive 92/43/EEC, The Habitats Directive	Screening report for AA (by Altamar)	Development would not be likely to adversely affect any Natura 2000 site. The courtyard site is of limited biodiversity interest.
Directive 2000/60/EC, EU Water Framework Directive	EPA assessed the nearby River Dodder in relation to the Water Framework Directive (WFD) Objective of <i>at least good status by 2027</i> . The Dodder estuary is of <i>Moderate</i> status and classed as <i>At Risk</i> .	. Proposed Rathfarnham Castle stables and farmyard development will not affect the river or ground water.
Urban Waste Water Treatment Directive 91/271/EEC, as amended	Uisce Eireann <i>Wastewater Treatment Capacity Register</i> (December 2024) states that the Ringsend Wastewater Treatment Plant has spare capacity.	No significant risk in terms of waste water arising from proposed development
Directive (EU) 2020/2184 Quality of Water for Human Consumption	The <i>10-Year Water Supply Capacity Register</i> which was published by Uisce Eireann in December 2024, shows there is available capacity in the public water supply system, but improvements needed to the level of service.	No significant risk in terms of water supply arising from proposed development
Directive 2001/42/EC, SEA Directive	The formulation of this Part 8 proposal is in accordance with the provisions of the South Dublin County Development Plan, 2022-2028. This Development Plan has been subject to assessment in accordance with the SEA Directive.	The proposed development accords with the Development Plan which itself has been subject to assessment in accordance with the SEA Directive

Directive 2002/49/EC, Environmental Noise Directive	The nature and scale of the development are such that, in the absence of mitigation measures, construction noise is more likely to give rise to adverse impacts. CORA Consulting Engineers compiled the <i>Preliminary Construction and Environmental Management Plan</i> (PCEMP). This states that an <i>Environmental Management Plan</i> (EMP) will be implemented by the contractor to ensure that potential impacts relating to noise nuisance and disturbance are effectively minimised.	Subject to mitigation, in accordance with the measures outlined in the PCEMP, including implementation of the EMP, the construction phase will not give rise to any significant impacts.
Directive 2008/50/EC on ambient air quality and cleaner air for Europe	EPA carries out monitoring and the area containing Rathfarnham. Air Quality generally shows no exceedances of limits.	There will be no significant impacts on air quality.
Directive 2007/60/EC on the assessment and management of flood risks	Strategic Flood Risk Assessment by South Dublin County Council, as set out in the County Development Plan, 2022-2028.	The development is not at risk of flooding.
Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives (The Waste Framework Directive)  Directive 1999/31/EC of 26 April 1999 on the landfill of waste	The Waste Framework Directive sets the basic concepts and definitions related to waste management, including definitions of waste, recycling and recovery. The <i>Construction Waste Management Plan</i> addresses the question of demolition and construction waste.	Waste generated during demolition and construction works will be typical of small scale urban development, as described in the <i>Preliminary Construction and Environmental Management Plan</i> . There will be no significant environmental effects.

Schedule 7 Criteria

**CRITERIA FOR DETERMINING WHETHER DEVELOPMENT LISTED IN PART 2 OF SCHEDULE 5 SHOULD BE SUBJECT TO AN ENVIRONMENTAL IMPACT ASSESSMENT**

*1. Characteristics of proposed development*

The characteristics of proposed development, in particular—

- (a) the size and design of the whole of the proposed development,
- (b) cumulation with other existing development 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,
- (c) the nature of any associated demolition works,
- (d) the use of natural resources, in particular land, soil, water and biodiversity,
- (e) the production of waste,
- (f) pollution and nuisances,
- (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
- (h) the risks to human health (for example, due to water contamination or air pollution).

*2. Location of proposed development*

The environmental sensitivity of geographical areas likely to be affected by the proposed development, with particular regard to—

- (d) the existing and approved land use,
- (e) 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:
  - (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;
  - (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.

*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),
- b) the nature of the impact,
- c) the transboundary nature of the impact,
- d) the intensity and complexity of the impact,
- e) the probability of the impact,
- f) the expected onset, duration, frequency and reversibility of the impact,
- 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
- h) the possibility of effectively reducing the impact.