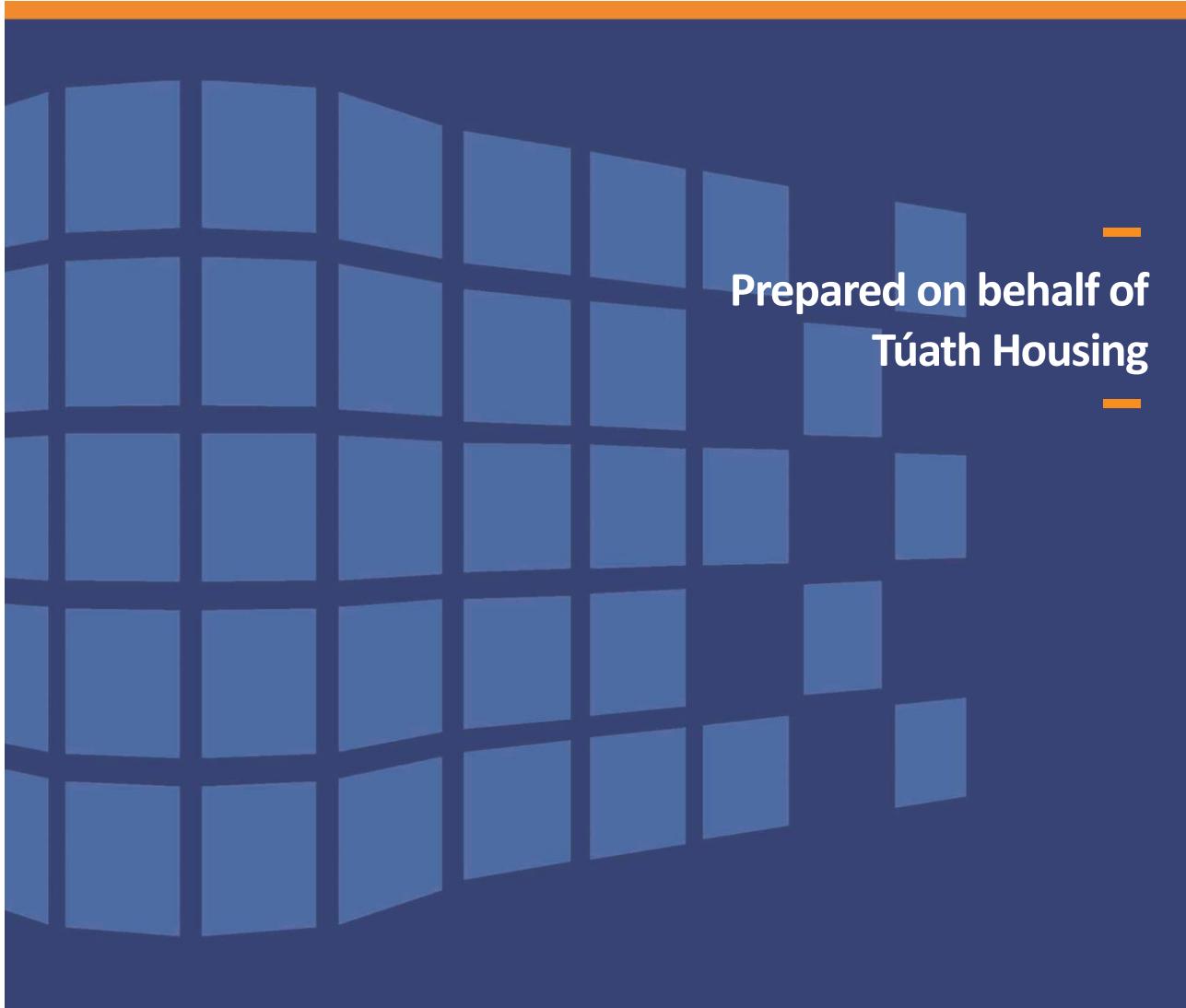


# Environmental Impact Assessment Screening Report

Residential Development at Kilhedge Lane, Lusk, Co. Dublin

October 2021



**Prepared on behalf of  
Túath Housing**

[www.mhplanning.ie](http://www.mhplanning.ie)

## DUBLIN

Kreston House, Arran Court  
Arran Quay, Dublin 7  
D07 K271

T. +353 (0) 1 804 4477  
E. info@mhplanning.ie

## CORK

6 Joyce House, Barrack  
Square  
Ballincollig, Co. Cork  
P31 YX97

T. +353 (0)21 420 8710  
E. info@mhplanning.ie

# Contents

<b>1.0 Introduction .....</b>	<b>3</b>
<b>2.0 Screening Assessment .....</b>	<b>4</b>
2.1 Mandatory EIA .....	4
2.2 Sub-threshold EIA .....	4
<b>4.0 Description of the Project.....</b>	<b>6</b>
4.1 Physical Characteristics.....	6
4.1.1 Size and Design.....	6
4.1.2 Cumulation with other Existing &/Or Approved Plans and Projects.....	8
4.1.3 The Nature of Any Associated Demolition Works.....	10
4.1.4 Use of Natural Resources .....	10
4.1.5 Production of Wastes .....	10
4.1.6 Pollution and Nuisances .....	11
4.1.7 Risks of Accidents and/or disasters.....	11
4.1.8 Risks to Human Health .....	12
<b>5.0 Location of the Proposed Development.....</b>	<b>13</b>
5.1 Existing and Approved Land Use .....	13
4.1.1 Transboundary Impacts.....	13
4.2 Natural Resources & Absorption Capacity .....	13
4.2.1 Landscape Character .....	13
4.2.2 Visual/Amenity Impact.....	13
4.2.3 Biodiversity.....	14
4.2.4 Land & Soil.....	14
4.2.5 Water Environment.....	14
4.2.6 Flood Risk .....	14
4.2.7 Cultural Heritage .....	15
<b>6.0 Type &amp; Characteristics of Potential Impacts.....</b>	<b>17</b>
<b>7.0 Conclusion.....</b>	<b>19</b>

## 1.0 Introduction

Environmental Impact Assessment (EIA) requirements derive from EU Directives. Council Directive 2014/52/EU amended Directive 2011/92/EU and is transposed into Irish Law by the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018.

Proposed development which falls within one of the categories of development specified in Schedule 5 of the Planning and Development Regulations 2001, as amended, which equals or exceeds, a limit, quantity or threshold prescribed for that class of development must be accompanied by an Environmental Impact Assessment Report (EIAR). Where a project is of a specified type but does not meet, or exceed, the applicable threshold then the likelihood of the project having significant effects (adverse and beneficial) on the environment needs to be considered.

The purpose of this Screening Report is to provide supporting information to assist the competent authority, in this instance, Fingal County Council to determine whether an EIAR is required to accompany the application for permission.

The criteria for determining whether development listed in Part 2 of Schedule 5 should be subject to an EIA are set out under Schedule 7. The information to be provided by the applicant or developer for the purposes of screening sub-threshold development for environmental impact assessment is set out under Schedule 7A of the Planning and Development Regulations, 2001, as amended by the 2018 Regulations. Paragraph 4 of Schedule 7A requires that: '*The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7.*' In this report, the information has been set out under the more detailed headings provided for under Schedule 7. In effect, this ensures that all of the information required under Schedule 7A has been furnished. It also presents the information in a manner that facilitates the competent authority in its screening assessment.

This Environmental Impact Assessment (EIA) Screening Report has been prepared by Rachel Condon of McCutcheon Halley Planning Consultants on behalf of the Applicant, Túath Housing, who intends to develop lands for residential development at Kilhedge Lane, Lusk. Rachel holds an MA (Hons) in Planning and Sustainable Development obtained from the University College of Cork. Rachel has 8 years of professional experience, working in NSW, Australia with Parramatta City Council and for private consultancies and as a planning consultant in Ireland.

## 2.0 Screening Assessment

### 2.1 Mandatory EIA

The subject development does not fall within any of the specified classes of development set out in Part 1 of Schedule 5.

The proposed development for 31 no. residential units and ancillary development falls within the category of an ‘Infrastructure Project’ within Schedule 5 (10) (b) of the Planning and Development Regulations, which provides that a mandatory EIAR must be carried out for the following projects:

- b)
- (i) *Construction of more than 500 dwellings*
  - (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.*
  - (iii) *Construction of a shopping centre with a gross floor space exceeding 10,000 square metres.*
  - (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 proposed development is for 31 units, on a site area of 0.86 ha. The proposed development does not trigger a requirement for a mandatory EIAR because:

- The number of accommodation units, at 31 units, falls below the threshold of 500 dwellings; and
- The site area of 0.86 ha falls below the area threshold for sites in built up areas.

### 2.2 Sub-threshold EIA

In cases where a project is mentioned in Part 2 but is classed as “sub-threshold development”, it is necessary for Fingal County Council to undertake a case-by-case examination to determine whether the proposed development is likely to have significant effects on the environment.

The criteria for determining whether development listed in Part 2 of Schedule 5 should be subject to an EIA are set out in Schedule 7 of the Planning and Development Regulations, 2001 ('the 2001 Regulations'), as inserted by Article 7 of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 ('the 2018 Regulations') and the information to be provided by the Applicant for the purposes of screening sub-threshold development for EIA is set out in Schedule 7A.

## 3.0 Methodology

According to European Commission Guidance (2017) “*Screening has to implement the Directive’s overall aim, i.e. to determine if a Project listed in Annex II is likely to have significant effects on the environment and, therefore, be made subject to a requirement for Development Consent and an assessment, with regards to its effects on the environment. At the same time, Screening should ensure that an EIA is carried out only for those Projects for which it is thought that a significant impact on the environment is possible, thereby ensuring a more efficient use of both public and private resources. Hence, Screening has to strike the right balance between the above two objectives.*”

As identified in **Section 2.2**, the proposed development is a ‘project’ for the purpose of the EIA Directive and implementing Regulations. However, it does not meet the applicable mandatory threshold as the number of units falls below the 500 dwellings threshold and urban development which would involve an area of 10 hectares in the case of other parts of the built-up area.

The key issue for the competent authority in the context of the possible need for EIA of sub-threshold is whether or not such development is likely to have significant effects on the environment. Consideration of significant effect should not be determined by reference to size only. The nature and location of a project must also be taken into account.

This EIA Screening Report is therefore being undertaken to determine in light of the criteria listed in Schedule 7A of the Planning and Development Regulations whether or not this proposed development will require full EIA.

According to the Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018) “*For all sub-threshold developments listed in Schedule 5 Part 2, where no EIAR is submitted or EIA determination requested, a screening determination is required to be undertaken by the competent authority unless, on preliminary examination it can be concluded that there is no real likelihood of significant effects on the environment. This is initiated by the competent authority following the receipt of a planning application or appeal. A preliminary examination is undertaken, based on professional expertise and experience, and having regard to the ‘Source – Pathway – Target’ model, where appropriate. The examination should have regard to the criteria set out in Schedule 7 to the 2001 Regulations. Where, based on a preliminary examination of the information submitted with the application and any other supplementary information received, the competent authority concludes that, having considered the nature, size and location of the proposed development, there is no real likelihood of significant effects on the environment, this should be recorded with reasons for this conclusion stated, and no EIA required or formal determination made. The recording of the competent authority’s view should be brief and concise, but adequate to inform the public. In many cases this considered view will be included in the planner’s/inspector’s report on the planning application and this may be cross-referenced in the competent authority’s decision. Normally, this will be published at the time of the decision of the competent authority.*”

## 4.0 Description of the Project

This section provides information on the physical characteristics of the proposed development and a description of the location of the project, with particular regard to the environmental sensitivity of geographical areas likely to be affected, as is required under paragraph 1 of Schedule 7A of the 2001 Regulations (as inserted by the 2018 Regulations, Article 97): See also Annex II(A) of 2014/52/EU.

### 4.1 Physical Characteristics

#### 4.1.1 Size and Design

The subject site is located at Kilhedge Lane, Lusk (the Site) approximately 600m south-west of the Main Street in Lusk and 20km from Dublin City Centre. The boundaries of the Site are defined by roads with Kilhedge Lane traversing the northern boundary, Chapel Farm Road and Chapel Farm Mews bounding the Site to the east and Chapel Farm Drive adjoining the Site to the west. The Site provides an elongated rectangular shape, and no existing improvements are provided on the greenfield site. The Site slopes gently from the north-eastern boundary to the south-western boundary of the Site.

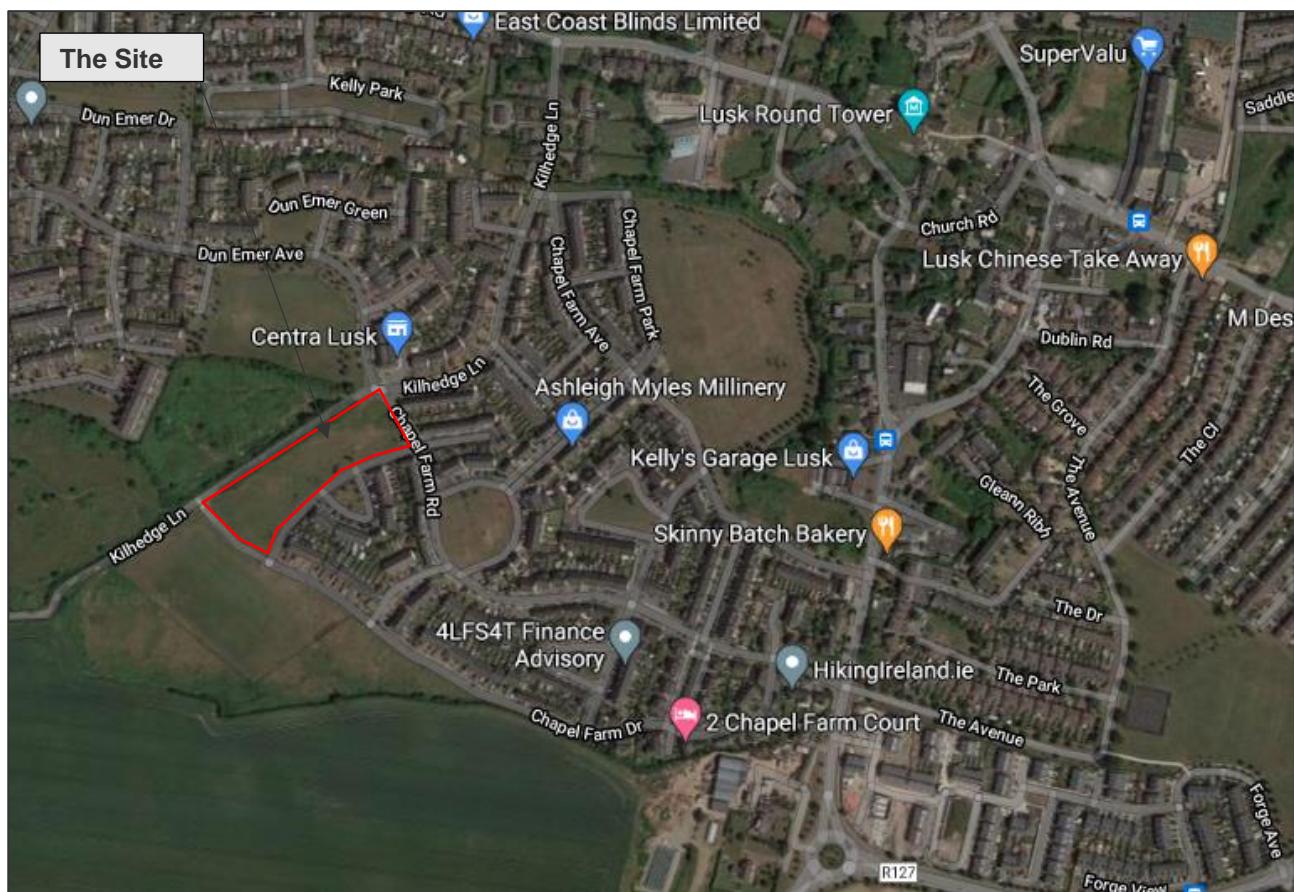


FIGURE 1: PROPOSED DEVELOPMENT SITE (SOURCE: GOOGLE MAPS)

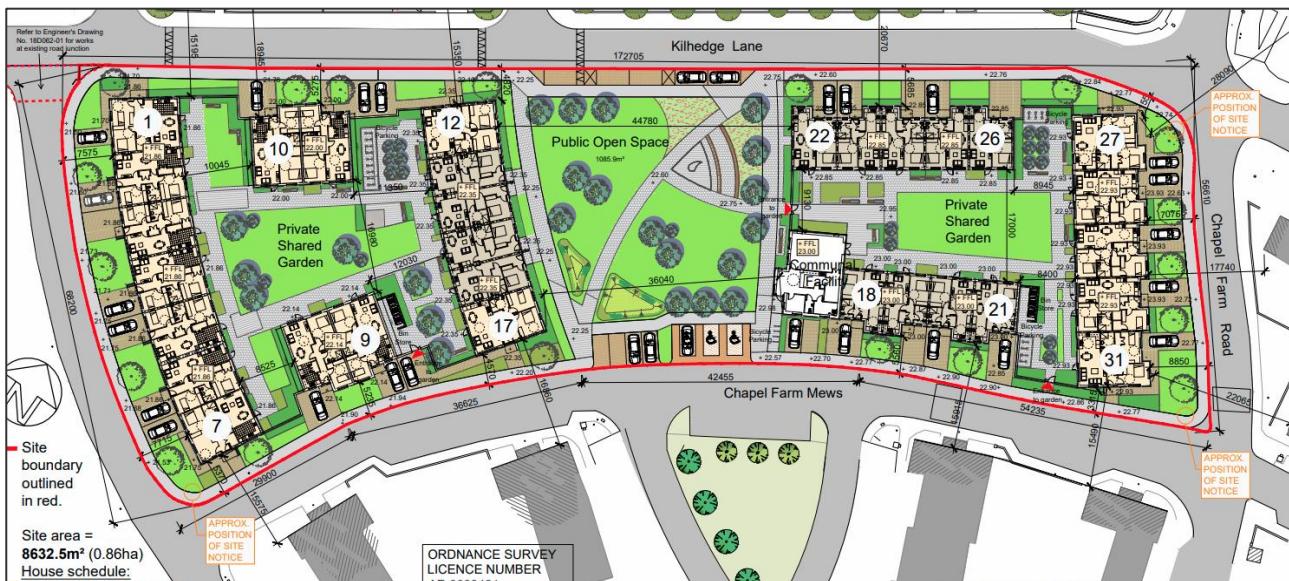
The Site is within easy walking distance of Lusk village and a number of retail and community facilities including local shops, creches and a café. Whist the Site is greenfield in nature, the surrounding area is characterised by medium density residential developments which provide a variety of heights ranging from 2-3 storeys.

The Site is adjacent to a number of residential developments including 'Chapel Farm' housing estate to the south and east and 'Dun Emer' residential developments to the north. Immediately to the north of the Site, planning permission was received for the construction of 54 dwellings, ranging from 1-3 storeys, in August 2017. The Site is located approximately 650m from a bus route and stop (ID:3763), offering transport

connections to the wider County and City via the 33, 33A and 33X bus routes which service Skerries, Balbriggan, Swords, Dublin City Centre and Dublin Airport.

The proposed sheltered housing development will consist of the following:

- The construction of 31 no. residential units to include 13 no. 1-bed and 2-bed single storey houses (gross floor areas ranging from 50sq.m - 51.7sq.m), 18 no. 2-bedroom single storey houses (gross floor areas ranging from 64.4sq.m – 66.9sq.m);
- A single storey communal facility;
- 41 car parking spaces;
- A private shared garden area including bin storage and bicycle parking spaces;
- Public open space; and
- All associated ancillary site development works.



**FIGURE 2: PROPOSED SITE LAYOUT (SOURCE: WALSH ASSOCIATES)**

As depicted above, the design groups the units into two blocks around a centrally located public open space. Within the blocks, the units are arranged around shared gardens and all units are directly accessible from public roads or the proposed public open space. The block on the east side provides the Communal Facility facing the public open space which allows direct access to the adjoining shared garden space. The public open space which is located at the centre of the two groups of units provide a total of 1,085.9 sq.m, representing 12.6% of the total site area. 41 no. car parking spaces are proposed which include 31 no. car parking spaces for the dwellings (29 of which will be located off street), 8 no. visitor parking spaces and 2 no. accessible spaces associated with the Communal Facility.

Further description of the architectural design is contained within the **Architect's Design Statement** prepared by Walsh Associates.

The **National Planning Framework, Project Ireland 2040 (NPF)** seeks to deliver 550,000 homes by 2040, and this is to be achieved by focussing growth in the State's cities. It sets out a target of at least 40% of all new housing to be delivered within the existing built-up areas on infill and/or brownfield sites. Whilst the NPF targets development on infill and/or brownfield sites this does not preclude the development of greenfield sites but instead emphasises that the reliance on greenfield sites only, should be avoided. While the development is located on greenfield land, it is zoned for residential development and will deliver upon progressing supported sustainable development located in proximity to Lusk Village. The proposal will assist in achieving National Policy Objectives (particularly Objective 10) providing services for older people to enable an improved

model of care for older persons to be delivered. The proposal will thereby improve citizen's quality of life and contribute toward promoting sustainable development.

The Site is located within the functional area of Fingal County Council. Development at this location is governed by the objectives and policies contained within the **Fingal County Development Plan 2017-2023 (FDP)** which was adopted by Fingal County Council on the 16<sup>th</sup> of February 2017. The FDP was subject to Strategic Environmental Assessment (SEA) during the plan preparation process. The purpose of the SEA is to provide a clear understanding of the likely environmental consequences of decisions regarding the adoption and implementation of the Plan. Measures to monitor significant environmental effects of the implementation of the adopted plan are provided within the SEA. The SEA concludes that avoidance of conflict with SEOs and the environment is dependent upon compliance with the mitigation measures which have emerged through the SEA, Appropriate Assessment (AA), Natura Impact Report and Strategic Flood Risk Assessment processes and which have been integrated into the FDP.

The results of the SEA as briefly referenced in the preceding paragraph have been taken into account for the purposes of this screening appraisal in so far as appears relevant, recognising that these results relate to strategic decision making rather than project level assessment.

#### 4.1.2 Cumulation with other Existing &/Or Approved Plans and Projects

In August 2018, the Department of Housing, Planning and Local Government issued “*Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment*”. These Guidelines were issued pursuant to section 28 of the 2000 Act and planning authorities and the Board are required to have regard to same when carrying out their functions under the Act.

The Guidelines summarise “cumulative effects” as:

*“Effects are not to be considered in isolation but cumulatively i.e. when they are added to other effects. A single effect on its own may not be significant in terms of impact on the environment but, when considered together with other effects, may have a significant impact on the environment. Also, a single effect which may, on its own, have a significant effect, may have a reduced and insignificant impact when combined with other effects”.*

The Directive requires that the EIAR describes the cumulation of effects. Cumulative effects may arise from: - The interaction between the various impacts within a single project; - The interaction between all of the differing existing and/or approved projects in the same areas as the proposed project. The Irish Courts, in Ratheniska Timahoe and Spink Substation Action Group v An Bord Pleanála [2015] IEHC 18, have held that the obligation to take into account the cumulative impact of the development, the subject matter of a planning application, with other developments is confined to existing and permitted development in the relevant area. It does not necessitate deliberation on possible future development which may be at the concept, design or the early planning stage and which may not yet have been authorised. (emp. added)

The proposed development site is 0.86 ha and is situated to the south-west of Lusk Village. The Site is zoned ‘RS’ for which the zoning objective is to “*provide for residential development and protect and improve residential amenity*”, pursuant to the Fingal Development Plan 2017-2023.

Historical imagery of the Site shows that it was used for agricultural purposes until 2005 and was subsequently cleared to be used as a compound during the construction of the Chapel Farm estate located to the south and south-east of the Site.

A search of the **Fingal Council Planning Database** identified details of various planning applications for development within the immediate catchment of the subject site.

Application Ref. No.	Address	Proposal	Decision
F00A/1366	South of Kelly Park, Lusk, Co. Dublin	Phase 1 of a residential development consisting of 111 no. 2, 3 and 4 bed semi-detached and terraced houses being a modification and a reduction in numbers to a current application for development Reg. Ref. F00A/1366 including all associated site works with sewer outfalls, through adjoining lands to the east connecting into permitted sewers Reg. Ref. F00A/1327. The site is located south of Kelly Park, Lusk with access off adjoining public road to the east including a local distributor road connecting public road to the west to serve remainder of site.	Granted Permission - 01 August 2001
F00A/1446	Dublin Road, Lusk, Co. Dublin	151 two storey houses (consisting of 35 four bedroomed houses, 85 three bedroomed houses, 31 two bedroomed houses) and associated development works and associated temporary sewage treatment works with access from Dublin Road, Lusk, Co. Dublin and upgrading of existing sewerage treatment works by means of temporary treatment works.	Granted Permission - 03 December 2001.  (Appeal Withdrawn PL.06F.125262)
F01A/1388	South of Kelly Park, Lusk, Co. Dublin	Permission sought for Phase 1A of a residential development (an existing permission for 111 Houses Reg. Ref. F00A/1366) consisting of 39 no. 3 bed houses including all associated site works and open spaces on site located south of Kelly Park and west of Phase 1 with access off permitted east/west distributor road no. 1.	Granted Permission - 09 May 2002
F02A/1442	South of Kelly Park, Lusk, Co. Dublin	Residential development with a total of 157 No. dwellings consisting of 34 no. 4 bed semi-detached houses, 85 no. 3 bed semi-detached houses, 18 no. 3 bed terraced houses and 20 no. 2 bed terraced houses including public open space, infrastructural works and site services on a site of circa 14.1 acres with access from existing permitted east west distributor road connecting Kilhedge Lane with Ministers Road being Phase 2 of an overall development. As part of this development an area of Class 1 Public Open Space of circa 1.48 acres is being provided to the east of the Dublin Road and South of Lusk Village. Phase 1 of the development Reg. Ref. F00A/1366, Phase 1A of the development – Reg. Ref. F01A/1388.	Granted Permission - 27 May 2003
F03A/1378	Chapel Farm, Dublin Road, Lusk, Co. Dublin	Amendments to planning permissions Reg. Ref. F00A/1446, F02A/0772, F02A/0964, consisting of the relocation of approved Class 1 Open Space Provision for Phases 1A, 1B and 2, and Class 2 Open Space Provision for Phases 1A and 1B, from the western portion to the northern portion of lands at Chapel Farm Residential Development (under construction) to concur with approved amendments to Action Area Plan for Lusk.	Grant Permission – 26 August 2004
F03A/1474	Chapel Farm, Dublin Road, Lusk, Co. Dublin	The construction of 146 houses consisting of 88 three bedroomed, two storey houses and 58 two bedroomed, two storey houses and associated development works on lands at Chapel Farm Residential development with access from Dublin Road, Lusk, Co. Dublin.	Grant Permission – 11 August 2004
F04A/0202	Kilhedge Lane, Lusk	Phase 3 of an overall residential development consisting of 67 no. residential units with 36 no. two and three bed terraced and semi detached houses and 24 no. 2 bed apartments in seven no. two storey blocks with a crèche/local facility at ground floor level of one block located north of Dun Emer Avenue and 7 no. 3 and 4 bed houses located south of Dun Emer Avenue, including public open spaces, infrastructural works and realignment of Ministers Road, bounding the west of the site with access off existing distributor road, connecting Ministers Road with Kilhedge Lane on lands south of Kelly Park. The previous phases of this development are completed or under construction.	Granted Permission – 30 June 2004
F04A/0261	Dun Emer, Kilhedge Lane, Lusk, Co. Dublin	A creche, retail and other neighbourhood facilities in 2 no. adjoining two storey blocks located west of the junction at Kilhedge Lane and Dun Emer Avenue on a site of circa 1,800m <sup>2</sup> including car parking, landscaping, with access off Kilhedge Lane. The development consists of 2 no. two storey blocks with total floor area of 828m <sup>2</sup> with 210m <sup>2</sup> of retail units and 36m <sup>2</sup> of storage and toilets on ground floor, 230m <sup>2</sup> of service units of first floor and a two storey creche of 362m <sup>2</sup> in a separate block. Previous permissions on site include F00A/1366, F01A/1388, F02A/1442 and a current application for 67 no. residential units Reg. Ref. F04A/0202.	Granted Permission - 03 June 2004
F04A/1534	Lands west of Kelly Park, Lusk, Co. Dublin	Phase 4 of an overall residential development consisting of 48 no. residential units with 20 no. three bed terraced houses with 10 no. 2 bed own door apartments at end of terraces and 6 no. 2 bed own door apartments in one two storey block and 6 no. 2 bed own door maisonettes under 6 no. 3 bed own door duplex units in one three storey block, located north of Dun Emer Drive and south of Ministers Road including public open spaces and infrastructural works, with access off Minister's Road, via Dun Emer Way. The previous phases of this development are completed or under construction. Previous permissions for Phases 1, 1A, 2 and 3, Reg. Refs F00A/1366, F01A/1388, F02A/1442 and F04A/0202.	Granted Permission - 19 April 2005
F05A/0127	Chapel Farm Residential Development, Dublin Road, Lusk, Co. Dublin	Construction of 93 houses consisting of 59 three-bedroomed, two storey houses and 34 two-bedroomed, two storey houses; one two storey creche building (gross floor area; 616 m <sup>2</sup> - to accommodate c. 100 children) with outdoor playing area and staff and drop-off parking; and associated development works on lands at Chapel Farm Residential Development with access from Dublin Road.	Granted Permission – 20 September 2005

F16A/0577	Lands located to the north of and including a portion of Kilhedge Lane, Lusk, Co. Dublin	Development on a site of 1.4 ha. The site is bounded to the north by an area of public open space adjoining Dun Emer Avenue, to the north west by residences at Dun Emer Glade and south west by agricultural lands, to the south by vacant lands adjoining Chapel Farm Copse and Mews and to the east by the junction of Kilhedge Lane, Dun Emer Avenue and Chapel Farm Road. The development will consist of the following: The construction of 54 no. dwellings comprising 36 no. 1-3 storey houses and 18 no. 3-storey duplexes/apartments consisting of 11 no. 2-beds, 32 no. 3-beds and 11 no. 4-bed dwellings ranging from c.77 sq.m.-133 sq.m. in size; Provision of two vehicular accesses onto Kilhedge Lane and upgrade of a portion of the lane adjoining the site; Provision of an electricity sub-station (c.6sq.m. in size); All associated site development works, site services provision, drainage, access points, open space' landscaping, car parking and boundary treatment works.	Granted Permission - 3rd September 2017
-----------	--	---	--

**TABLE 1: PLANNING HISTORY OF SURROUNDING LANDS**

In summary, there are a total of 11 no. planning applications in the immediate vicinity of the Site, which could have in-combination effects that would be capable of resulting in likely significant impacts to the environment. Notwithstanding this, it is reasonable to assume that all development consents would incorporate conditions requiring protection of the environment during the construction and operational phase.

Foul water will be discharged to a local authority foul sewer and treated in the Portrane Waste Water Treatment Works (WWTW). The WWTW has a population equivalent (PE) of 65,000 and incorporates secondary treatment. The plant is currently operating within its ELVs and providing a high level of treatment before discharge to the Irish Sea. It is the responsibility of Irish Water to provide adequate treatment of foul water, and to assess any potential impacts that it may have on the Natura 2000 network. Notwithstanding this, there is no evidence to suggest that foul water from the proposed development could have any impact on Natura 2000 sites as outlined in the accompanying AA. Irish Water (IW) reviewed a pre-connection enquiry and advised that there is capacity currently available and the proposed connection to the Irish Water network can be facilitated (Irish Water Letter attached dated 29/2/2020), it is evident that there is sufficient capacity to cater for the proposed 31 units.

Overall, it is considered that the proposed development will have a significant permanent positive impact when considered in the context of existing and approved plans which will provide supported housing for older persons.

#### 4.1.3 The Nature of Any Associated Demolition Works

The Site is a greenfield site, and no demolition works are required.

#### 4.1.4 Use of Natural Resources

The proposed development is on a greenfield site which has not been previously disturbed due to construction activities. Development of the proposed scheme will necessitate the stripping of topsoil (present to a depth of 0.3m BGL) and excavation of subsoils (made ground and cohesive deposits). It is intended to retain the majority of excavated material to be re-used on site as fill and landscaping materials, subject to testing to verify its suitability. Where excess spoil or soil material is left over from the landscaping works, this material will be brought to a licensed waste facility for disposal following appropriate waste classification.

The development is for 31 no. residential units as part of a Part 8 sheltered housing development and there will be no activities on-site which would have a high demand for water resources. Natural resources may be used in the construction process (i.e. stone, gravel, water), but during the operational phase there are no uses proposed that will require the out of the ordinary use of natural resources.

#### 4.1.5 Production of Wastes

Best practice procedures in general will minimise waste generated on-site. Measures including good site management will be taken to limit the quantity of waste generated during construction phase. Waste such as excavated material on-site will be recycled where possible.

Residues and emissions from the construction phase of the development will be related to construction waste and emissions from construction plant. No out of the ordinary residues, or emissions, are likely during the construction phase of the development and an environmental construction waste management plan will include details of any mitigation measures, if required. The applicant will seek to optimise reusing and recycling of generated waste during the construction phase. All waste will be segregated on site and stored separately prior to removal to an accredited facility. This will have a positive environmental effect as waste to landfill will be minimised.

No residues are likely during the operational phase of the development. Emissions will be linked to air conditioning and heating systems and will fall within regulated standards for modern residential developments. Operational waste generated will be domestic waste from the residential units. All domestic waste will be disposed of by a licensed waste contractor.

#### 4.1.6 Pollution and Nuisances

Construction sites, by their very nature, can create nuisance, due to noise generation, dust arising from site preparation and mud tracked onto public roads. However, there are standard proven mitigation measures that effectively minimise the effect. The main risk to water quality during the construction phase arises from potential runoff of silt laden rainwaters associated with site excavations including the new extension, hard surfaces (footpaths, parking, etc), installation of services and native planting associated with landscaping works. An attenuation drain leading to a temporary sump may be installed at the site entrance at the early part of the construction stage, the purpose of which is to ensure water or soil is prevented from flowing onto the public road. Surface water from roofs and hard surfaces will be attenuated, passed through a Class 1 Hydrocarbon Separator, and discharged to a storm drain on a surrounding road. This is standard best construction practice, which will capture any sediment laden waters and ensure they do not exit the Site onto the public road. Therefore, all such waters will be retained on-site during construction.

In terms of dust nuisance during the construction phase, the Site is surrounded by existing residential development. Standard dust mitigation measures will be integrated into the construction phase and it is considered that any impact would be short-term and not significant i.e. an effect which causes noticeable changes in the character of the environment but without significant consequences

Other sources of pollutants include fuels, oils, concrete and chemicals. The management of these will be subject to best construction practice relating to storage and use and any risk of accidental spillage is low. If a spillage does occur, it is likely to be localised, and will be dealt with by the contractor using best construction practice.

During the operational stage it is considered that the proposed residential development, given the small scale, would not have any negative impact in terms of pollution or nuisance. Irish Water confirmed that the WWTP has sufficient capacity to cater for the proposed development.

#### 4.1.7 Risks of Accidents and/or disasters

The Site, of circa 0.86 ha, is located to the south-west of Lusk Village. The surrounding area is made up of predominantly residential dwelling units and open space/recreational amenities zoned land to the immediate west.

The proposed development is on a greenfield site, of low ecological value in terms of habitat. An Appropriate Assessment Screening has been carried out by NM Ecology, which concludes that the proposed development

will not have a significant impact on the qualifying interests and conservation objectives for Natura 2000 sites, and that the integrity of these sites will not be adversely affected.

The Site is not located within a Flood Zone and no mapped indicative fluvial, pluvial, coastal or groundwater flood zones have been recorded within or adjacent to the boundary of the proposed development site. This is further detailed in the accompanying **Site-Specific Flood Risk Assessment** (SSFRA) prepared by IE Consulting.

The most environmental sensitive aspect of the geographical area is the amenity of existing residential units to the north, east and south.

The contractor's Construction Management Plan (CMP) will be informed by a detailed risk assessment and the implementation of standard proven construction mitigation measures will negate the risk of major accidents or disasters arising during the construction phase.

#### 4.1.8 Risks to Human Health

Construction sites pose potential risk to the health and safety of the public. However, access by the public would be considered trespassing on private property. Assuming observance of private property, no health and safety impacts to the public would be anticipated.

A description of the measures to manage construction traffic on the public road to ensure the protection of human health will be provided in the CMP.

To reduce the potential for health and safety risks, the project developer would require that all contractors prepare a site-specific health and safety plan before initiating construction activities. The plan would inform those on site of the measures to take in the event of an emergency and would be maintained for the duration of the construction phase.

During the operational phase the risk to human health is considered to be negligible. The proposed design provides for the segregation of pedestrians and traffic and incorporates the principles of universal access and the requirements of Part M of the Building Regulations so that the development will be readily accessible to all, regardless of age, ability or disability.

The integration of energy efficient measures into the design will provide for healthier living standards for future occupants.

## 5.0 Location of the Proposed Development

### 5.1 Existing and Approved Land Use

The Site, of circa 0.86 ha, is located to the south-west of Lusk Village. The surrounding area is made up of predominantly medium density residential dwelling units and recreational open space.

There have been no planning applications recorded in relation to the Site.

The proposed site is on lands zoned 'RS' in the Fingal Development Plan 2017-2023. This objective states as follows:

"Provide for residential development and protect and improve residential amenity."

The proposed development is in line with this objective.

#### 4.1.1 Transboundary Impacts

Given the location of the proposed development there will be no transboundary impacts.

## 4.2 Natural Resources & Absorption Capacity

### 4.2.1 Landscape Character

The Site may be considered as comprising an open character with grassed areas.

It is entirely appropriate that the Site be developed for residential use and this is consistent with the Site's zoning objective and compatible with its existing surrounding environment. The proposed landscaping scheme has been sensitively conceived and will enhance the open space setting of the adjoining open space/recreational amenity (Chapel Farm pitch) lands, located to the west of the Site.

The proposed development consists of:

- The construction of 31 no. residential units to include 13 no. 1-bed and 2-bed single storey houses (gross floor areas ranging from 50sq.m - 56.3sq.m), 18 no. 2-bedroom single storey houses (gross floor areas ranging from 75.4sq.m - 77.3sq.m);
- A single storey communal facility;
- 41 at-grade car parking spaces;
- A private shared garden area including bin storage and bicycle parking spaces;
- Public open space; and
- All associated ancillary site development works.

### 4.2.2 Visual/Amenity Impact

During the construction phase, plant and machinery will be required on-site. The impact of the construction phase is considered to be neutral, not significant and temporary.

A comprehensive landscape strategy has been prepared by Cunnane Stratton Reynolds Land Planning and Design to accompany the application, which aims to create a sustainable and biodiverse setting which incorporates significant amenity grass areas.

The layout and design of the proposed development is cognisant of the amenities of surrounding land uses. While the construction of the proposed development is likely to result in change to the visual environment from some nearby viewpoints, having regard to the low-density single storey nature of the proposal and the pattern

of residential development that has taken place on the sites in the area, these changes are not considered significant and consistent with emerging trends for development in the area.

#### 4.2.3 Biodiversity

An AA Screening report for Appropriate Assessment has been carried out by NM Ecology and is based on the best available scientific information and shows that the proposed development poses no potential for significant effects and there is no risk of direct or indirect impacts on any Natura 2000 sites either alone or in combination with other plans and projects, and therefore does not require progression to Stage 2 Appropriate Assessment. Based on this conclusion it is submitted that the competent authority can determine, based on objective scientific information, that an Appropriate Assessment is not required.

#### 4.2.4 Land & Soil

The proposed development has been designed to minimise the impact of land movement. No basement works are proposed, and the disturbance of soil will be minimal. This will include the stripping of topsoil and excavation of the underlying subsoils at this Site. Development of the Site will necessitate the stripping of topsoil and excavation of the underlying subsoils. Considering that the underlying bedrock and soils are well drained, and the Site is relatively level, it is expected that most rainfall on the Site would percolate to ground rather than flow into surface-water drainage features.

Given the location of the Site, within an existing built-up area, the loss of both land-use and soils is considered appropriate. The proposed scheme retains a significant amount of land for open space and the excavated topsoil will be reused for landscaping.

#### 4.2.5 Water Environment

The most immediate hydrological feature in the vicinity of the proposed Site is an unnamed stream watercourse that flows in a north-west to south-east direction approximately 130m beyond the south-western boundary of the Site.

There is no basement proposed as part of this development and so the risk to groundwater is not deemed likely. It is not considered that the construction stage would pose a significant risk to the local surface water environment, subject to standard proven construction mitigation measures being implemented. The underlying bedrock and soils are well drained, and the Site is relatively level, it is expected that most rainfall on the Site would percolate to ground rather than flow into surface-water drainage features.

During the operational stage generated foul effluent and surface water will be discharged to the existing municipal sewer. The development will not impact on the local surface or groundwater environment.

#### 4.2.6 Flood Risk

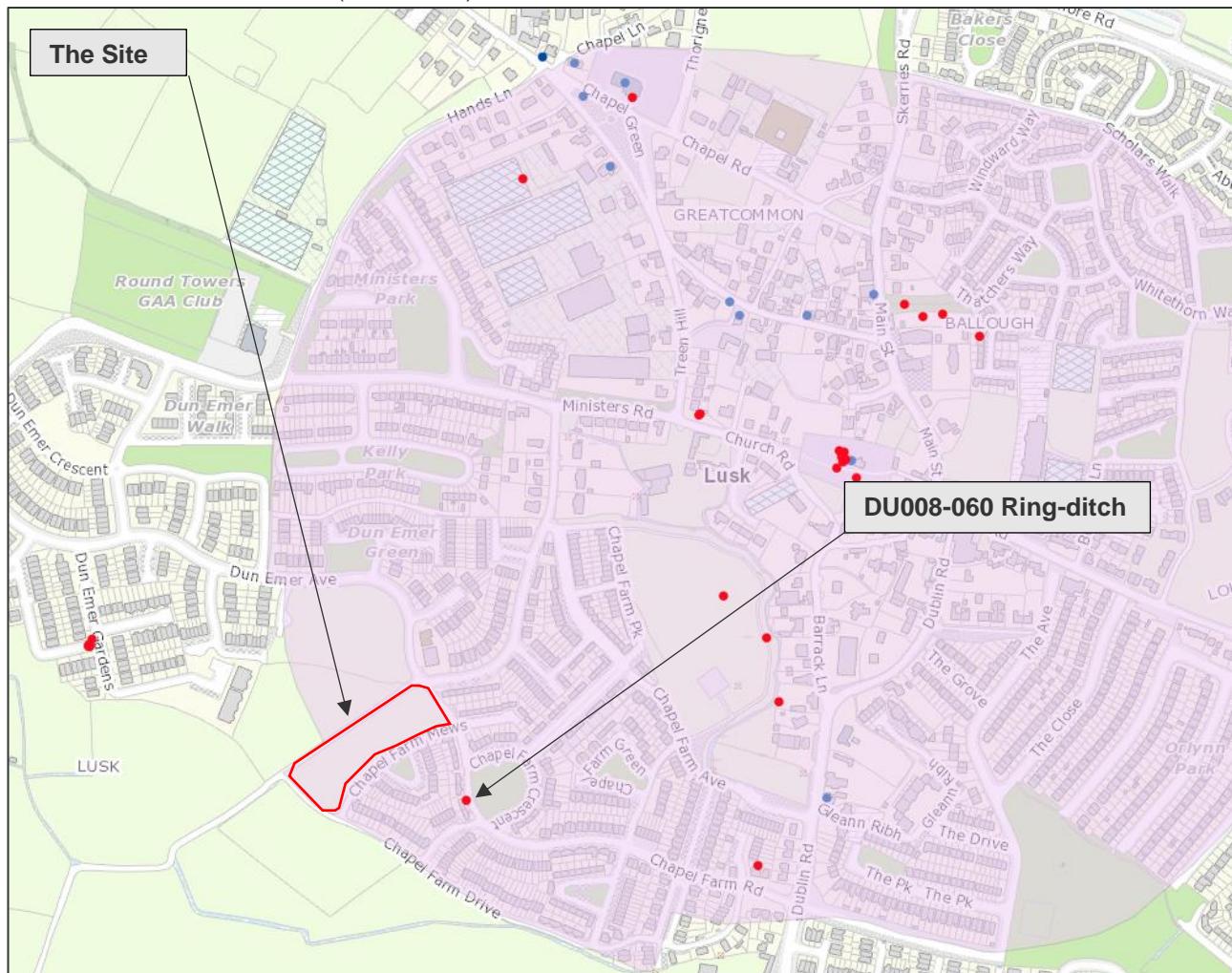
There is very low potential for surface water run-off from neighbouring properties to enter the Site. The neighbouring lands are composed of built up mature residential areas with their own surface water collection and drainage systems in place.

The Office of Public Works (OPW) Flood Maps identifies that the Site or its surrounds have not flooded in the past. However, PFRA indicates a potential indicative pluvial flood risk located approximately 85m beyond the boundary of the Site, which is located in the vicinity of the unnamed stream watercourse. This pluvial flood risk is more likely to be a potential indicative fluvial flood risk associated with the unnamed stream watercourse. Notwithstanding this, the report concludes that the reach length of the unnamed stream watercourse channel beyond the south-western boundary of the proposed development site does not pose a fluvial flood risk to the Site.

A SSFRA accompanies this application and considers that the Site is located within Flood Zone 'C' and is not subject to the requirements of the Justification Test stipulated in The Planning System & Flood Risk Management Guidelines. To avoid any residual flood risk, due to the effects of climate change, the report recommends that finished ground levels are constructed to a minimum of 0.15m above existing levels. Overall, the flood risk to the proposed development Site is **LOW** and is not considered to result in an adverse impact to the hydrological regime of the area or increase flood risk elsewhere. The Site is considered appropriate for development from a flood risk perspective.

#### 4.2.7 Cultural Heritage

As depicted in **Figure 3** below, the Site is located within the zone of notification to Lusk, given the archaeological and historical interest and potential of the town. This zone does not define the exact extent of the monuments but is intended to identify the monuments for the purposes of notification under Section 12 of the National Monuments Act (1930-2004).



**FIGURE 3: ZONE OF NOTIFICATION (PURPLE SHADING) AND SITES AND MONUMENTS RECORD (SOURCE: ARCHAEOLOGY.IE)**

As part of the Chapel Farm development, located to the south of the Site, the area was archeologically monitored, and suitable measures were implemented at the time to allow excavation at the Site. As part of the archaeological assessment prepared by Byrne, Mullins and Associates for the proposed planning application, the following was noted within the report:

*"The Chapel Farm estate to the south end east was developed in the early-mid 2000s; such development was undertaken in phases, during which time the subject development site was used as*

*a construction compound and storage area, resulting in extensive topsoil stripping and ground disturbance works”.*

A possible ring-ditch (DU008-060) was revealed as part of the redevelopment of the Chapel Farm mews. The ring-ditch is identified on the Sites and Monuments Record (SMR). The archaeology.ie historic environment viewer outlines that according to McCabe’s report on archaeological excavation Phase 2, “a possible ring-ditch with several associated deposits of burnt material in sub-circular cut pits (McCabe 2004a, 175). This had rounded terminals opening westwards. There was no evidence for a corresponding bank. The base of the terminals contained five carbonised slit planks associated with burnt bone”.

The above-mentioned source outlines that the proposed ring-ditch is not scheduled for inclusion in the next revision of the Records and Monuments and Places (RMP).

There are no items listed on the national inventory of architectural heritage located in the immediate vicinity of the Site.

There is no evidence available which provides any buildings or archaeological sites on the Site. The proposed development provides an approximate 80m buffer between the ring-ditch and the Site boundary. According to the report prepared by Byrne, Mullins and Associates the two main impacts of the development, with respect to archaeological features, can be described as physical and visual. In terms of the physical impacts, the report outlines that as the overall extent of the Site has been subject to topsoil stripping and ground disturbance works associated with its use as a construction compound and storage area and as per the monitoring by an archaeologist (Stuart Halliday), nothing of archaeological interest was uncovered. Regarding the visual impacts, as no archaeological monuments are located within or in the immediate environs of the Site, the report outlines that it is not likely that any impacts to any identified archaeological monuments will occur.

The development within the vicinity of archaeological notification does not seriously detract from the setting of the feature and is sited and designed appropriately. Therefore, there will be no impacts on Cultural Heritage in the area as a result of the proposed development.

## 6.0 Type & Characteristics of Potential Impacts

This section of the report focuses on those effects that are likely to occur during both the construction and operational stages, post the application of mitigation measures. The potential for impacts arising during the construction and operational phases has already been considered in the report above. The characteristics of the likely effects arising from the proposed development are rated using the descriptive terminology presented in the EPA (2017) *Guidelines on the Information to be contained in Environmental Impact Assessment Reports – Draft*.

We note the criteria of paragraph 3 of Schedule 7, *Characteristics of Potential Impacts*:

- *The potential significant effects of proposed development in relation to criteria set out under paragraphs 1 and 2 above, and having regard in particular to:*
- *the extent of the impact (geographical area and size of the affected population),*
- *the trans frontier nature of the impact,*
- *the magnitude and complexity of the impact,*
- *the probability of the impact,*
- *the duration, frequency and reversibility of the impact.*

These criteria are dealt within the report above and **Table 2** below summarises the predicted post-mitigation significance, quality and duration of the identified likely effects.

It should be noted that given the nature and scale of the proposed development, there is no likelihood of transfrontier impacts arising from either the construction or operational phases.

**Table 2** demonstrates that post-mitigation there is no significant negative effect predicted to result from the development of the lands at Kilhedge Lane, Lusk.

Characteristic	Possible Effect	Probability	Extent	Significance of Effect	Quality of Effect	Duration
Landscape	Loss of open space character as a result of development of greenfield area	Unlikely	Local	Not significant	Neutral	Permanent
Visual	Emergence of plant and machinery associated with the construction phase	Likely	Local	Not significant	Neutral	Temporary
Land	Change in land use from vacant to residential	Likely	Local	Not significant	Neutral	Permanent
Soil	Stripping of topsoil and excavation of subsoils (Soil is intended to be reused on-site)	Likely	Local	Not significant	Neutral	Temporary
Water	Potential increase in surface water run-off to existing surface water sewer	Likely	Local	Not significant	Neutral	Permanent
Air	Dust emissions associated with construction works, wind blow from stockpiles, or machinery movement	Likely	Local	Not significant	Neutral	Temporary

	may lead to reduction in air quality.					
	Exhaust emissions from construction vehicles may result in a reduction of air quality.	Likely	Local	Imperceptible	Neutral	Temporary
Noise	Increase in noise during construction phase	Likely	Local	Imperceptible	Neutral	Temporary
Cultural Heritage	Damage to unrecorded subsurface archaeological features that may exist within the site	Unlikely	Site	Imperceptible	Neutral	Permanent

**TABLE 2: DESCRIPTION OF EFFECTS – POST MITIGATION**

## 7.0 Conclusion

The proposed development does not trigger the threshold for mandatory EIA. This report provides the information required under Schedule 7A of the Planning and Development Regulations 2001 (as amended) to assist the planning authority to screen the proposed development for Environmental Impact Assessment.

This Environmental Impact Assessment Screening Report has determined that the characteristics of the proposed development are considered not significant due to the scale and nature of the proposed development, the characteristics and sensitivities of the receiving environment and design and standard proven construction measures that will be implemented as part of the construction and operational phase of the proposed development.

Development of the Site for residential use is appropriate in the context of the applicable zoning objective and national policy. With proposed mitigation measures in place, it is not anticipated that the construction or operational phases of the proposed development, whether considered on its own, or in-combination with surrounding projects or plans, will give rise to likely significant environmental effects.

Likely positive effects are forecast as the land will provide much needed supported residential development for the elderly consistent with the zoning objective for the Site. The provision of large portions of landscaping on-site, in the form of gardens and grassed public open space and their enhancement, through the inclusion of swale planting, tree planting and shrub planting will result in a positive biodiversity impact.

The Appropriate Assessment Screening Report that accompanies the planning application demonstrates that the proposed development will not impact on identified European Designated Sites within the zone of influence of the proposed development either alone, or in combination with, other plans or projects.

Having regard to the scale and nature of the project and based on a considered assessment taking account of all available information, the proposed mitigation measures outlined in the various detailed technical documents which are routine and known to work, the overall probability of impacts on the receiving environment arising from the proposed development (during the construction or operational phases) is considered to be low.

The overall conclusion of this screening exercise is that there is no requirement for an Environmental Impact Assessment for the proposed development.