

**CUNNANE STRATTON REYNOLDS**

## **Environmental Impact Assessment Screening Report**

**Prepared by**


**Cunnane Stratton Reynolds**

**For**

**Proposed Residential Development at Garristown, Co. Dublin**

## Document Control Sheet

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## STATEMENT OF COMPETENCY

The companies and personnel who contributed to this report and their qualifications and experience are outlined below.

The EIA Screening Report has been compiled and coordinated by Eamonn Prenter and assisted by Elaine Edmonds of Cunnane Stratton Reynolds town planning consultants who are experienced in the coordination of such documents. The report has been prepared to accompany a Part 8 application under the Planning and Development Act 2000 (as amended) and associated Regulations.

This EIA screening assessment has been prepared by personnel with competency and experience in both the EIA and screening processes, EIAR inputs, EIAR co-ordination and by those qualified in the relevant fields of technical expertise. The report has also had due regard to and is consistent with the Appropriate Assessment Screening Report prepared by Cunnane Stratton Reynolds. A statement of competency / experience for each person involved in this EIA screening Report, is presented below.

### **Eamonn Prenter, BA (Hons) Geography, MSc Planning; MRTPI MIPI, Director, Cunnane Stratton Reynolds**

Eamonn is a chartered town planner with both public and private experience and over 30 years post qualification experience having undertaken a number of EISs, EIARs and screening reports. He has also carried out a number of SEAs (Strategic Environmental Assessments) for various planning policy documents including statutory local area and development plans.

### **Elaine Edmonds, BA (Hons) Environmental Science, MSc Spatial Planning, MSc Regeneration and Urban Development, PG Dip Urban Design; ARTPI, MIPI, Executive Planner, Cunnane Stratton Reynolds**

Elaine is a qualified environmental planner with a BA (Hons) Degree in Environmental Science and is an environmental planner with 5 years post qualification experience. She has experience of providing inputs to both EIARs and EIAR screening from her roles as both environmental scientist and planner.

## 1.0 INTRODUCTION

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### 1.1 Project Brief

Cunnane Stratton Reynolds has prepared a EIA Screening Assessment on behalf North & East Housing association in respect of a project to consist of a Part 8 planning application for a residential development of 6 houses at Garristown. Co. Dublin. The proposed project consists of detached and semi-detached 1 and 2 bed houses with associated parking and landscaping.

The purpose of this screening report is to determine whether the project will require EIA. Where the requirement for EIA arises an Environmental Impact Assessment (EIAR) must accompany the application for permission.

Details of the construction and design of the proposed development are provided in the reports attached to the Part 8 Application. A more detailed development description is contained within Section 3.1.

It is noted that specific Regulations dealing with environmental screening obligations under Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 ("the 2014 Directive") have not yet been implemented in Ireland. Notwithstanding, having regard to best practice and guidance; this screening report has regard to Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment as amended by the 2014 Directive. The provisions of the Planning and Development Regulations 2001, as amended, including the European Union (Planning and Development) (Environmental Impact Assessment) Regulations which came into effect on 1<sup>st</sup> September 2018, are also considered in this report with respect to EIA and EIA Thresholds.

This report outlines the methodology used to screen the proposed development in respect of environmental assessment and assesses the requirement to prepare an EIAR. It sets out the proposal, the assessment of potential environmental effects, and the outcome and conclusions of the screening process.

This EIA Screening Statement has been prepared having regard to Directive 2011/92/EU, as amended by Directive EU 2014/52 which came into effect in May of 2017. The EIAR Screening Statement has been written to address the guidance provided by "*Advice on Administrative Provisions in Advance of Transposition and Implementation of Directive 2014/52/EU on the effects of certain public and private projects on the environment (EIA Directive)*" and the 'Key Issues Consultation Paper' prepared by the Department of Housing, Planning Community and Local Government, May 2017. The EIA Screening is also informed by the advice contained in the Department of Housing, Local Government and Heritage guidance to date, in particular *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment*, August 2018.

### 1.2 What is an Environmental Impact Assessment Report?

The amended directive uses the term Environmental Impact Assessment Report (EIAR) for what was formerly referred to in Irish legislation as an Environmental Impact Statement.

An EIAR is:

*'A statement of the effects, if any, which proposed development, if carried out, would have on the environment.'*

The EIAR is prepared by the proposer of a development and is submitted to a Competent Authority (CA) as part of a consent process. The CA uses the information provided to assess the environmental effects of the project and, in the context of other considerations, to help determine if consent should be granted. The information in the EIAR is also used by other parties to evaluate the acceptability of the project and its effects on the environment and to inform their submissions to the CA. The EIAR consists of a systematic analysis and assessment of the potential effects of a proposed project on the receiving environment. The amended EIA Directive prescribes a range of environmental factors which are used to organise descriptions of the environment and these factors must be addressed in the EIAR.

The key changes introduced by the amended Directive and which are relevant to the information to be contained in an EIAR relate to a range of environmental factors which are used to organise descriptions of the environment and these factors must be addressed in the EIAR. These are listed below:

- 1) Population and Human Health
- 2) Land Soils and Geology
- 3) Water and Services including Hydrology and Hydrogeology
- 4) Air Quality and Climate
- 5) Noise and Vibration
- 6) Biodiversity (Flora and Fauna)
- 7) Traffic, Transportation and Parking
- 8) Cultural Heritage
- 9) Archaeology
- 10) Waste Management
- 11) Material Assets
- 12) Visual Impact Assessment
- 13) Interactions

## **2.0 PURPOSE OF THIS EIAR SCREENING REPORT**

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### **2.1 Overview**

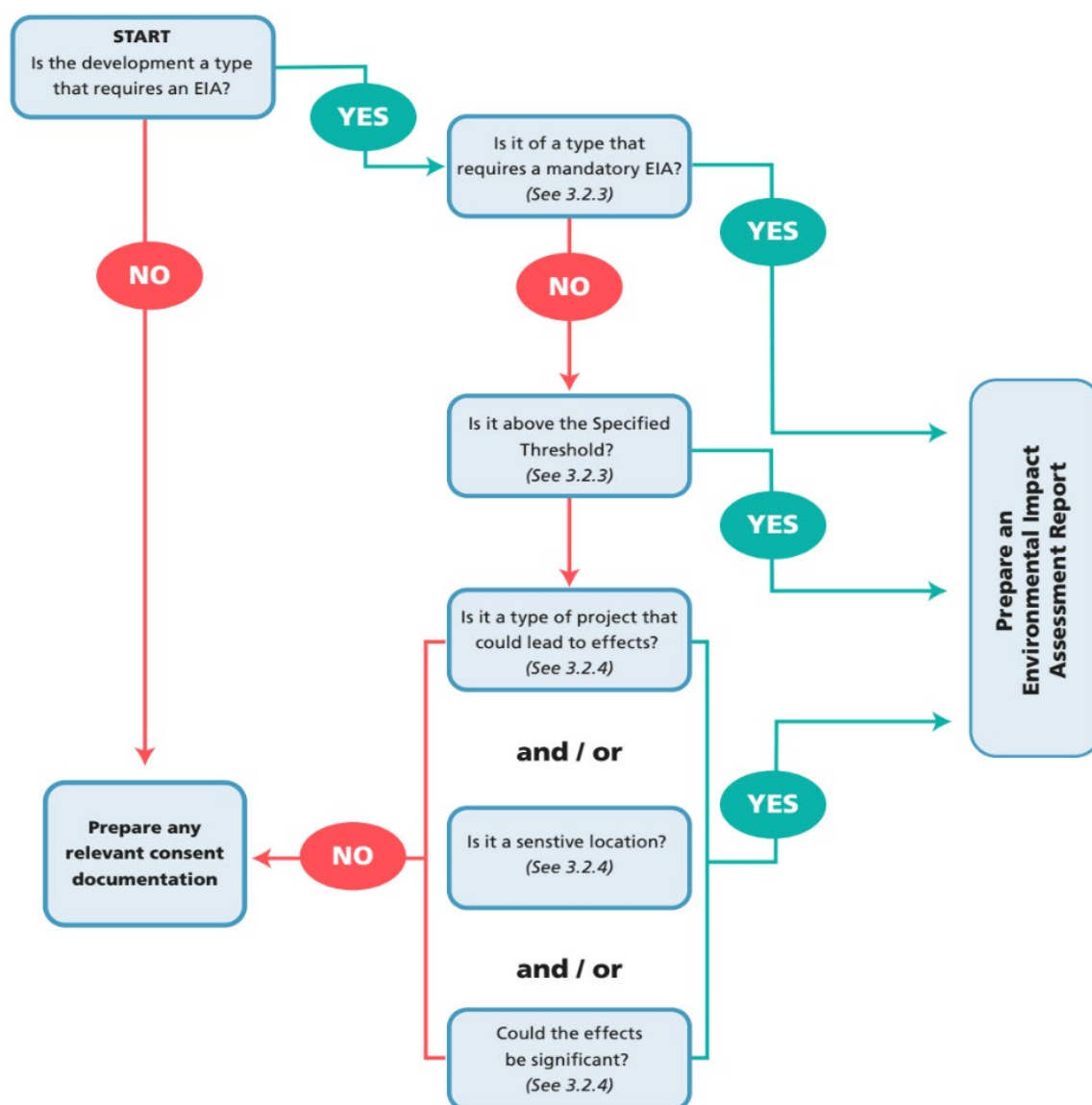
The overall purpose of this Screening Report is to identify and detail the findings of the desktop study undertaken to analyse the impacts, if any, of the proposed development on the receiving environment and, based on the results, decide whether or not an EIAR is required.

The term 'screening' is used to describe the process of ascertaining whether or not a proposed development project requires an Environmental Impact Assessment Report to be provided to aid EIA by the competent authority of that project. EIAR is mandatory where project size, type or location EIA thresholds are met or exceeded. By request of the competent authority, an EIAR may be requested where mandatory EIA criteria are not met but the authority deems EIA necessary. EIA legislation sets out the types of projects that require a mandatory EIAR and the considerations that may give rise to the requirement for an EIAR where prescribe thresholds are not met.

The mandatory requirement for an EIAR is based on the nature and/or scale of a development. This is addressed in EU Directive 85/337/EEC (as amended by Directive 97/11/EC and 2014/52/EU). Regard must also be had to the criteria set out under Annex III of the EIA Directive.

In determining whether a development requires an EIAR to be undertaken, it is first necessary to determine whether the development falls into a category of development for which an EIAR is mandatory and thereafter consider whether the proposed development would require an EIAR if the relevant spatial or area threshold for that category is exceeded. Where the development falls within the relevant area or spatial category as sub-threshold, it is then necessary to consider whether the proposed development is likely to give rise to significant effects on the environment. Such significant effects may arise by virtue of the type and scale of development proposed, and also the location of the development in relation to nearby sensitive environments as set out below.

**Figure 1: Screening Process**



Source, Table 3.2 Draft Guidelines on the Information to be contained in Environmental Impact Assessment Reports, EPA, August 2017.

The project giving rise to this screening report is a proposed development of 6 no. houses. It is proposed to secure development consent via the Part 8 process set out in the Planning and Development Regulations 2001, as amended. These Regulations prescribe development for

which EIAR and thus EIAR preparation is mandatory at Schedule 5 and sub threshold EIA requirement considerations at Schedule 7.



## **2.2 Legislative Background**

The Planning and Development Act 2000, as amended and the Planning and Development Regulations 2001, as amended, outline the requirements for the assessment of the effects of certain projects on the environment.

Section 176 of the Planning and Development Act, 2000 provides the initial steps in relation to the criteria of determination on whether an EIA is required. It allows the Minister to prescribe classes of development that require EIA having regard to Ministerial Powers and EIA transposed legislation.

Part 10, Article 92 of the Planning and Development Regulations define “sub-threshold development” as *“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.”*

### **2.2.1 Project Type**

The screening process begins by establishing whether the proposal is a ‘project’ as understood by the EIA Directive (as amended). The development of 6 no. house is a ‘project’ as it constitutes a development that requires planning permission under the Planning and development statutes.

### **2.2.2 Thresholds**

The next step to screening is to determine whether the project exceeds a specific threshold. Thresholds are set out in Annex I and II of the EIA Directive, as amended. For this proposal, thresholds in the Planning and Development Regulations, 2001 as amended are also relevant.

It must be ascertained whether the proposal is a type where EIA and thus EIAR is prescribed and whether it exceeds the applicable thresholds or not. The Draft Guidelines on Environmental Impact Assessment Reports published by the EPA in 2017 note that projects at first glance may not appear to come under the Schedule but on closer examination when the process is further examined, they may do so because of the sensitivity or significance of the receiving environment etc.

In this instance the proposal is not of a type, scale or activity at Schedule 5 of the Planning and Development Regulations, 2001 as amended or Schedule 7 of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 where EIAR is prescribed and does not require an Environmental Impact Assessment Report due to the activity type proposed.

#### ***Mandatory EIAR***

Other categories of specified EIA development are listed in Schedule 5 (Part 1 and Part 2) of the Planning and Development Regulations, 2001(as amended). These and those in the

amended EIA Directive 2014/52/EU (also ref Directive 2011/92/EU) Annex I and Annex II have also been reviewed and it is not considered that the proposal breaches any relevant threshold.

In the amended EIA Directive 2014/52/EU, Annex I contains projects referred to in Article 4(1) of the amended Directive. There are 24 no. separate forms of development covered by that Annex. The proposal does not represent a form of development considered under **Annex I** where an EIAR is considered mandatory.

In the amended EIA Directive 2014/52/EU, **Annex II** contains projects referred to in Article 4(2) of the amended Directive. There are 13 no. separate forms of development (including sub classes) that are referred to in that Annex. The proposal would fall within the category of “Residential Development” project under Class 10(b). However, the threshold for this form of project under the 2001 Regulations as amended is 500 dwelling units. The proposed Part 8 application for 6 units is less than the current threshold.

It can be concluded that an EIAR is not a mandatory requirement for the proposed development. While the mandatory requirements for developments are relatively straightforward, being based on project type and scale, the discretionary (or sub-threshold) requirements are based on an assessment of the likely significant environmental effects of the proposed development at the subject site. This is assessed below.

#### *Sub-Threshold EIAR*

Where a project is of a specified type but does not meet, or exceed, the applicable thresholds above then the likelihood of the project having significant effects on the environment needs to be considered (both adverse and beneficial). This is done by reference to the criteria as specified in Annex III of the amended Directive.

Recital (27) of Directive 2014/52/EU states that:

*“The screening procedure should ensure that an environmental impact assessment is only required for projects likely to have significant effects on the environment”.*

The Guidelines go on to state that the project needs to be considered in its entirety for screening purposes. This means that all elements of an overall project must be considered for significance of impact. Other related projects need to be identified also and appraised at an appropriate level of detail. This will identify the likely significance of cumulative and indirect impacts thus providing the consent authority with a context for its determination.

This screening exercise has determined that the proposal does not meet or exceed the nearest typology threshold of 20 hectares at Schedule 5, Part II, 10. Infrastructure in the present case.

Directive 2014/52/EU introduced a new mandatory article, Article 4(4), which states:

*“Where Member States decide to require a determination for projects listed in Annex II, the developer shall provide information on the characteristics of the project and the likely significant effects on the environment. The detailed list of information to be provided is specified in Annex IIA. The developer shall take into account, where relevant, the available results of other assessments of the effects on the environment carried out pursuant to Union legislation other than this Directive. The developer may also provide a description of any features of the*

*project and/or measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment”.*

Article 4(4) introduces a new Annex IIA to be used in the case of a request for a Screening determination for Annex II projects. The information to be provided by the developer is set out below.

A description of the project including, in particular:

1. A description of the physical characteristics of the whole project, and where relevant, of demolition works,
2. A description of the location of the project, with particular regard to the environmental sensitivity of geographical areas likely to be affected,
3. A description of the aspects of the environment likely to be significantly affected by the project.
  - a. A description of any likely significant effects, to the extent of the information available on such effects, of the project on the environment resulting from,
  - b. The expected residues and emissions and the production of waste where relevant; and
  - c. The use of natural resources, in particular soil, land, water and biodiversity.

The Guidelines state that the criteria of Annex II shall be taken into account, where relevant, when assessing predicted environmental impact.

The criteria for determining whether or not a Sub threshold EIAR may required are set out in Schedule 7 of the Planning & Development Regulations, 2001 (as amended) including the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 and Annex III of the EIA Directive as amended.

Schedule 7 of the Planning & Development Regulations, 2001 lists criteria for determining whether development listed in part 2 of schedule 5 should be subject to an environmental impact assessment by virtue of:

- I. Characteristics of Proposed Development
- II. Location of Proposed Development
- III. Type & Characteristics of Potential Impacts

This report will now review the proposed development project under these three main criteria.

### **3.0 THE PROPOSED DEVELOPMENT, CONTEXT & LOCATION**

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#### **3.1 Proposed Development**

The proposed development will involve the development of a site of less than 1 ha. in extent at Garristown, Co. Dublin. The proposed development includes the following:

The project consists of six dwellings, three 2-bed homes and three 1-bed homes, 4 car parking spaces, a set-down area, and associated landscaping and site works.

The development site is located within the village envelope on a vacant site. Under the Fingal County Development Plan 2017 – 2023 and the Garristown Local Area Plan 2010, extended until July 2020 the site is identified within the ‘*Existing Development Area of Village*’. The site is not located within or directly adjacent to any Natura 2000 site (SAC or SPA). Current land use in the vicinity is predominantly agricultural and residential in nature. There are no water



courses in the immediate vicinity. Indirect hydrological connection between the subject site and any European site through the site connection to the wastewater treatment plant is a connection that may be excluded due to the site's distance from the plant, the development utilising available capacity in the established plant and the degree of dilution which would occur from any accidental discharge.

**Figure 2** Site Location Map



**Figure 3** Street View of the Site



## 4.0 SUB-THRESHOLD ASSESSMENT

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### 4.1 Sub-Threshold Assessment Guidance

In considering whether the proposed sub-threshold development is likely to have significant environmental effects, it is necessary to have regard to the criteria set out under Schedule 7 of the Planning and Development Regulations 2001 as amended, including the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 or Annex III of the EIA Directive.

The criteria set out in Annex III are grouped into three categories:

- (i) Characteristics of Proposed Development (Project),
- (ii) Location of the Proposed Development (Project) and
- (iii) (Type and) Characteristics of Potential Impacts.

Consent authorities (CA) must have regard to these criteria in forming an opinion as to whether or not a sub-threshold development such as the proposed development, is likely to have significant effects on the environment.

### 4.2 Assessment Criteria

Schedule 7, of the Planning and Development Regulations 2001 as amended provide the criteria for determining whether a development would or would not be likely to have significant effects on the environment under Articles 103, 109 and 120.

The criteria are set out as follows:

#### 4.2.1 *Characteristics of the Proposed Development*

In impact terms, Schedule 7 requires a review of a sub threshold proposal in light of:

- the size of the proposed development;
- the cumulation with other proposed development;
- the nature of any associated demolition works;
- the use of natural resources;
- the production of waste;
- pollution and nuisances;
- the risk of accidents, having regard to substances or technologies used.

The amended EIA Directive 2014/52/EU, Annex III elaborates on the above and notes that:

“The characteristics of projects must be considered, with particular regard to:

- (a) the size and design of the whole project;
- (b) the cumulation with other existing and/or approved projects;
- (c) the use of natural resources, in particular land, soil, water and biodiversity;
- (d) the production of waste;
- (e) pollution and nuisances;
- (f) 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;
- (g) the risks to human health (for example due to water contamination or air pollution).

#### **4.2.2 Location of the Proposed Development**

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

- (a) the existing and approved land use,
- (b) 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;
  - (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.

#### **4.2.3 Characteristics of Potential Impacts**

The likely significant effects on the environment of proposed development 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.

### **4.3 Characteristics of the Proposed Development**

The proposed development involves standard residential construction and associated drainage and landscaping. The construction activity and resulting use are unlikely to give rise to significant environmental impact.

#### **4.3.1 The Size of the Proposed Development**

The site area covers 0.19 Ha approximately within a village envelope.

The scale of the development in this location is not significant in terms of impact.

#### **4.3.2 The Cumulation with other Proposed Developments**

In order to assess the cumulative impact of the proposed development on the receiving environment, a planning search on the County Council's website has been undertaken.

A desktop search on the Council Planning System indicated that there are no planning applications for large scale development in the immediate area of the site likely to interact with



the proposed development. There are no other proposed developments on the site or known projects adjoining the site.

#### **4.3.3 The Nature of any Associated Demolition Works**

There are no proposed demolition works associated with the proposed development.

#### **4.3.4 The Use of Natural Resources**

There are no significant use of natural resources associated with this type or scale of development.

#### **4.3.5 The Production of Waste**

No significant additional waste will arise from the operational phase of the development.

The construction phase will involve waste streams and will be included in a Construction and Demolition Waste Management Plan.

#### **4.3.6 Pollution and Nuisances**

There are no expected sources of pollution or other nuisances expected with the development including significant sources of noise, light or odours. Any potential nuisances arising during construction will be mitigated and controlled as per a Construction Management Plan.

#### **4.3.7 The Risk of Accidents, Having Regard to Substances or Technologies Used**

There are no substances or technologies used such as to increase the risk of accidents from the development proceeding.

#### **4.3.8 The Risks to Human Health**

There are no sources of risk to human health associated with this type and scale of residential development. The Health and safety risks arising from the operation of heavy machinery and other works during the construction phase will be managed as per the construction management plan and standard health and safety requirements for construction.

### **4.4 Location of the Proposed Development**

The location of the proposed development is set out in Section 3.1 above.

The proposed development is located within an existing developed area of the Garristown Village. It is not considered that there are any sensitive environmental receptors in the immediate area as per the accompanying AA screening report.

#### **4.4.1 The Existing and Approved Land Uses**

The site is within the village envelope and zoned for residential development.

#### **4.4.2 The relative abundance, quality and regenerative capacity of natural resources in the area**

The proposed development is within a rural village with significant surrounding natural landscape. The scale of the site in relation to the surrounding land uses is diminutive and will not significantly impact the abundance or quality of the natural resources.

#### **4.4.3 The absorption capacity of the natural environment**

Beyond the confines of the site there are two SACs and two SPAs within 15km of the subject site, all in excess of 13km from the site.

**Figure 4;** Designated sites within 15km of the proposed development from AA Screening



An Appropriate Assessment Screening Statement was prepared to assess the potential impacts of the proposed development on the designated sites. The AA Screening Report concludes there is no likelihood of any significant effects on any European sites arising from the proposed development, either alone or in combination with other plans or projects.

#### 4.5 Characteristics of Potential Impacts

Potential impacts are discussed with respect to the characteristics identified within the legislation. Given the scale and type of development and its location, no impacts are expected to arise from the development.

## 5.0 CONCLUSIONS

The proposed development is assessed to fall outside of the requirement for mandatory EIA by virtue of the limited size of the development site, its developed context and proposed activity typology. Having regard to the **characteristics of the proposed development** sub-threshold EIA is not considered required again, due to the scale and type of development.

In relation to the **location of the proposed development**, the site is located in a village environment with adjoining residential land uses. The AA Screening Report found that there is no likelihood of any significant effects on any European sites arising from the proposed development, either alone or in combination with other plans or projects.



**Characteristics of the potential impacts** of the proposed development are unlikely to be significant in this location. Any impact associated with noise, vibration, air, and traffic are likely to be insignificant and will be managed at construction and operation stages.

Therefore, having regard to the criteria outlined in Section 7 of the Planning and Development Regulations 2001, as amended, it is concluded that the proposed development will have **no likely significant effect, indirect or direct, on the receiving environment, either on its own or cumulatively with other development**. It is our professional opinion that no adverse impacts occur such as to warrant an Environmental Impact Assessment for a sub threshold development.