



ENVIRONMENTAL IMPACT ASSESSMENT SCREENING REPORT FOR PROVISION OF GLAMPING PODS AT CAMAC VALLEY CARAVAN & CAMPING PARK, CORKAGH, CO. DUBLIN

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1. Introduction

1.1 Background

Envirico Ltd was commissioned by South Dublin County Council to undertake an Environmental Impact Assessment Screening for the provision of glamping pods at Camac Valley Caravan & Camping Park, Corkagh, Dublin 12. The purpose of this EIA Screening is to assess if an EIA is required for the proposed development, as discussed in the provisions of the Planning and Development Act 2000 (Amended) and Schedule 5 of the Planning and Development Regulations, 2001 (Amended) (S.I. 600/2001). Under Schedule 5 of this regulation, certain types of projects, as a result of their potential to significantly affect the environment, require EIA. Other types of projects require specifically stated factor thresholds to be reached in order to require EIA, with those projects not achieving these thresholds requiring the decision of the relevant competent authority. These specific projects not reaching such thresholds should consider the potential significant effects of the project in relation to its scale, extent, location, characteristics of the receiving environment and environmental sensitivities.

1.2 Statement of Authority

This report has been prepared by Maurice O Connor. Maurice holds BSc (Hons) degree in Wildlife Biology from Munster Technological University (MTU), MSc in Ecological Assessment from National University of Ireland Cork (UCC) and he is a full member of the Chartered Institute of Ecology and Environmental Management, (MCIEEM). Maurice is an experienced ecological consultant with over 10 years' professional experience in Ireland, working independently and within consultancy. He has strong generalist ecological field skills in terrestrial and riparian environments and through his experience can demonstrate undertaking a range of ecological surveys including habitat, invasive and protected species survey, delivering initial site appraisals and identification of ecological constraints to inform environmental reports including EIAR, EcIA, SEA and AA. Maurice has undertaken ecological assessments and surveys on a variety of project types (e.g. road schemes, waste, water, energy, and housing) involving survey, mitigation and enhancement. During his time as an environmental consultant, Maurice has completed numerous environmental assessments for both plans and projects..

2. EIA Legislation

Environmental Impact Assessment (EIA) requirements are derived from the EIA Directive (Directive 2011/92/EU as amended by Directive 2014/52/EU). The aim of this directive is to determine the likely significant effect of a project on the environment. The amended Directive came into force in May 2017 and has been transposed into national legislation and enacted. No changes to the prescribed project types or thresholds are required under the amended Directive so the types and thresholds set out in the 2001-2010 Regulations remain in effect.

EIA legislation as it relates to the planning process has been largely brought together in Part X of the Planning and Development Acts 2000-2018. Part 1 of Schedule 5 from the Planning and Development Regulation lists project types, included in Annex I of the Directive which automatically require EIA. Part 2 of Schedule 5 lists project types included in Annex II. Corresponding developments to Annex II automatically require EIA if no threshold is given or if they are exceeding a given threshold. Developments, which correspond to Annex II project types but are below the given threshold must be screened to determine whether they require a sub-threshold EIA or not. Schedule 6 from the Planning and Development Regulations 2001 sets out aspects of the environment that may be significantly affected by a proposed development. Assessing these is completed by consideration of criteria set out in Schedule 7.

3. Screening Considerations

3.1 Class of Development

This development does not correspond to any of the project types in Annex I of the EIA directive, however, it can fall into the Annex II to category of Infrastructure Project types.

3.2 Infrastructure Projects

Schedule 5, Part 2, section 10 b (iv) of the Planning and Development Regulations, 2001 includes this project type.

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).

The EU guidance on ‘Interpretation of definitions of project categories of Annex I and II of the EIA Directive’ (2015) interprets ‘urban development’ as taking ‘account of, *inter alia* the following:

- i. Projects with similar characteristics to car parks and shopping centres could be considered to fall under Annex II (10)(b). This could be the case for example, of bus garages or train depots, which are not explicitly mentioned in the EIA Directive, but have similar characteristics to car parks.
- ii. Construction projects such as housing developments, hospitals, universities, sports stadiums, cinemas, theatres, concert halls and other cultural centres could also be assumed to fall within this category. The underlying principle is that all these project categories are of an urban nature and that they may cause similar types of environmental impact.
- iii. Projects to which the terms ‘urban’ and ‘infrastructure’ can relate, such as the construction of sewerage and water supply networks, could also be included in this category.

As there is no business district in Gormanston, and the proposed development measures approximately c. 8 hectares in area, it does not meet the threshold for requiring an EIA.

3.3 Sub-threshold Development

A sub-threshold development is as defined in article 92 of the Planning and Developments Regulations 2001 (amended) as;

“A 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.”

Although the proposed development corresponds to an Annex II project type, it does not meet the prescribed thresholds above; therefore, it is to be considered a sub-threshold development. Given the scale of the proposed development, it is unlikely to cause sufficiently significant effects to warrant a sub-threshold EIA. However, considering the ‘wide scope and broad purpose’ of the EIA Directive, it is appropriate to consider if the proposed development is likely to cause significant environmental impacts. Therefore, in order to provide a comprehensive screening, this screening proceeds to consider it against the Schedule 7 criteria. Schedule 7 specifies the criteria for determining whether a development would or would not be likely to have significant effects on the environment under these three headings.

- Characteristics of Proposed Development
- Location of Proposed development
- Characteristics of Potential Impacts

3.4 Section 7 Criteria Assessment

Table 1: Characteristics of the proposed development

Section 7 Criteria: Characteristics of Proposed Development	
Is the size and design of the proposed works significant?	No. The area where the pods are to be located is less than 1ha and falls below the threshold for urban developments.
Potential for impacts from project in accumulation with other existing and/or approved projects	<p>No. The majority of proposed and permitted developments within the area surrounding the proposed development site over the previous five years are largely composed of private extensions, demolitions and smaller residential developments. Three larger scale developments were also identified.</p> <p>However, given the nature and design of these developments which incorporate best design practice for wastewater and surface water management, and the scale and nature of the works at Camac Valley Caravan and Camping Park, there is unlikely to be any in combination effects from the proposed development.</p>
Use of natural resources in particular land, soil, water and biodiversity?	No. The site will be developed on what is currently amenity grassland.
Will the works produce waste?	Yes. Construction related wastes to be disposed of in accordance with an approved waste management plan.
Will the works create a significant amount of pollution or nuisance?	<p>No, SuDS drainage design and existing WWTS at the site.</p> <p>Minor and localised temporary impacts due to noise and construction traffic during the works.</p>
Risk of major accidents and/or disasters relevant to the project including those caused by Climate Change in accordance with scientific knowledge?	No
Risks to human health (water contamination, air pollution)	No

Table 2: Location of Proposed development

Section 7 Criteria: Location of Proposed Development	
Environmental Sensitivity of project in relation to existing and approved land use.	The proposed development site is located within an existing camping and caravan park at Camac Valley Caravan & Camping Park, Corkagh, Dublin 22, D22DR60. The nearest European Site is Glenasmole Valley SAC 6.1km south.
Relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground	The impacts are anticipated to be negligible given the scale of the proposed development. The site is composed primarily of amenity grassland
Absorption capacity of the natural environment including wetlands, riparian areas, river mouths, coastal zones and the marine environment, mountain and forest area.	The site is composed primarily of amenity grassland. There is an existing SUDS system and WWTS at the site.
Potential of works to impact directly or indirectly on sites designated for nature conservation (NHA/SAC/SPA)	No. No hydrological connection exists between the site and any surrounding sites designated for nature conservation.
Potential for impacts directly or indirectly on Habitats or Species listed on Annex I , II and IV of the Habitats Directive	No. The habitats within the development boundary are dominated by amenity grassland which is not a habitat listed under Annex 1 of the Habitats Directive.
Potential for impacts on breeding places of any species protected under the Wildlife Act?	No. The site boundary is comprised of treeline and hedgerow habitat that may provide suitable breeding habitat. Habitat loss will be predominantly linked to heavily maintained amenity grassland and not likely have an impact on local flora and fauna. Three Leyland cypress trees (<i>Cupressus x leylandii</i>) stood approximately 6-9 metres tall, 5-6 metres wide at the base and 20 metres apart. No evidence of bat, bird or mammal use was observed of these trees. These trees are to be removed.
Potential to impact directly or indirectly on any listed ACA in the County Development Plan?	No.

Potential to impact directly or indirectly on any protected structure or recorded monuments and places of Archaeological Interest	No.
Potential to impact directly or indirectly on Listed or scenic views or protected landscape in the County Development Plan?	No potential impact
Potential to impact on areas in which there has already been a failure to meet the environmental quality standards and relevant to the project or in which it is considered that there is such a failure.	Not applicable
Potential to impact on densely populated areas	The proposed development is located in an existing campsite. Potential for minor localised increase in traffic during the duration of works

Table 3: Characteristics of Potential Impacts

Section 7 Criteria: Characteristics of Potential Impacts

Human Beings	Construction works will likely see minor and localised impacts to traffic activity in the area for the duration of site works.
Flora and Fauna	Habitat loss will be predominantly linked to heavily maintained amenity grassland and not likely have an impact on local flora and fauna. Three Leyland cypress trees (<i>Cupressus x leylandii</i>) stood approximately 6-9 metres tall, 5-6 metres wide at the base and 20 metres apart. No evidence of bat, bird or mammal use was observed of these trees. These trees are to be removed.
Soils and Geology	No impact on existing soil characteristics outside of the site boundary are envisaged by the proposed development.
Water	An existing SuDS network and WWTS are in place at the site.
Air & Climate	No impact envisaged on air quality by the proposed development.

Noise & Vibration	Noise and Vibration levels will be restricted during the works, no potential impacts following construction
Landscape	The site is located at Camac Valley Caravan & Camping Park, Corkagh, Dublin 12. The site is dominated by amenity grassland and the proposed development will not have a negative impact on the existing landscape.
Material Assets	The proposed development will not have any significant impact on material assets including public utilities and natural resources.
Cultural Heritage	There are no recorded protected structures or NIAH sites within the development footprint. Appendix 1 shows all protected sites within the surrounding area.
Interaction of Foregoing	No significant effects likely to arise associated with the characteristics of the potential impacts.

Table 4: Discussion of Potential Impacts

Section 7 Criteria: Discussion of Potential Impacts	
Will a large geographical area be impacted as a result of the proposed works?	No
Will a large population be impacted as a result of the proposed works?	No
Are any trans-frontier impacts likely to arise from proposed works?	No
Is the intensity and complexity of impacts associated with the proposed works considered significant?	No
Is there a high probability that the impacts will occur?	No. Lack of watercourses, drainage ditches and existing SuDS & WWTS designs ensures a low probability of impacts.
What is the expected onset, duration, frequency and reversibility of the impact?	N/A
Accumulation of the impact with the impact of other existing and/or approved projects?	No cumulative impacts are envisaged.
Will it be difficult to avoid, or reduce or repair or compensate for the effects?	N/A

4. Conclusions

The proposed development falls within the scope of the infrastructure project type prescribed in the section 10 b (iv) of the Planning and Development Regulations, 2001. The proposed development is <1ha in area and it is classed as sub-threshold in nature.

Having considered the nature, scale, and location of the proposal, having regard to the characteristics and location of the proposed development, and having regard to the characteristics of potential impacts, under Section 7 criteria of the Planning and Development Regulations 2001, it is considered that the project is unlikely to give rise to significant environmental impacts. Therefore, a sub-threshold EIA and EIAR are not required.

5. References

Guidelines on the information to be contained in Environmental Impact Assessment Reports, EPA, 2017 (Draft)

Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact

Interpretation of definitions of project categories of annex I and II of the EIA Directive, EU 2015

Appendix 1

