2019

South Dublin County Council

Minogue and Associates

# ENVIRONMENTAL IMPACT ASSESSMENT SCREENING REPORT PROPOSED HOUSING AT KNOCKLYON, SOUTH DUBLIN

Prepared to inform South Dublin County Council

# CONTENTS

This report has been prepared by Minogue and Associates with all reasonable skill, care and diligence. Information reported herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid. This report is prepared for South Dublin County Council we accept no responsibility to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at their own risk.

# 1 INTRODUCTION

## 1.1 INTRODUCTION

Minogue and Associates have been commissioned by South Dublin County Council (SDCC), to complete an Environmental Impact Assessment (EIA) screening exercise in relation to a proposed housing development at Knocklyon, South Dublin.

This EIA Screening exercise was undertaken to determine if EIA is required for the proposed development as set out in the mandatory and discretionary provisions of the Planning and Development Act, 2000 (as amended) (the Act) and in Schedule 5 of the Planning and Development Regulations, 2001 as amended (the Regulations). Certain projects, listed in Schedule 5 of the regulations, due to their always having the potential for significant environmental effects, require mandatory EIA. Others, also listed in the Schedule 5 of the regulations, contain threshold levels and for projects that fall below these thresholds it is the decision of the competent authority to decide if an EIA (and the associated Environmental Impact Assessment Report (EIAR) is required.

Whether a 'sub threshold' development should be subject to EIA is determined by the likelihood that the development would result in significant environmental effects. Significant effects may arise due to the nature of the development, its scale or extent and its location in relation to the characteristics of the receiving area, particularly sensitive environments.

This report documents the methodology employed to complete the screening exercise, having regard to relevant legislation and guidance documents. It also sets out a clear rationale for each decision made in the process.

### 1.1 STATEMENT OF AUTHORITY

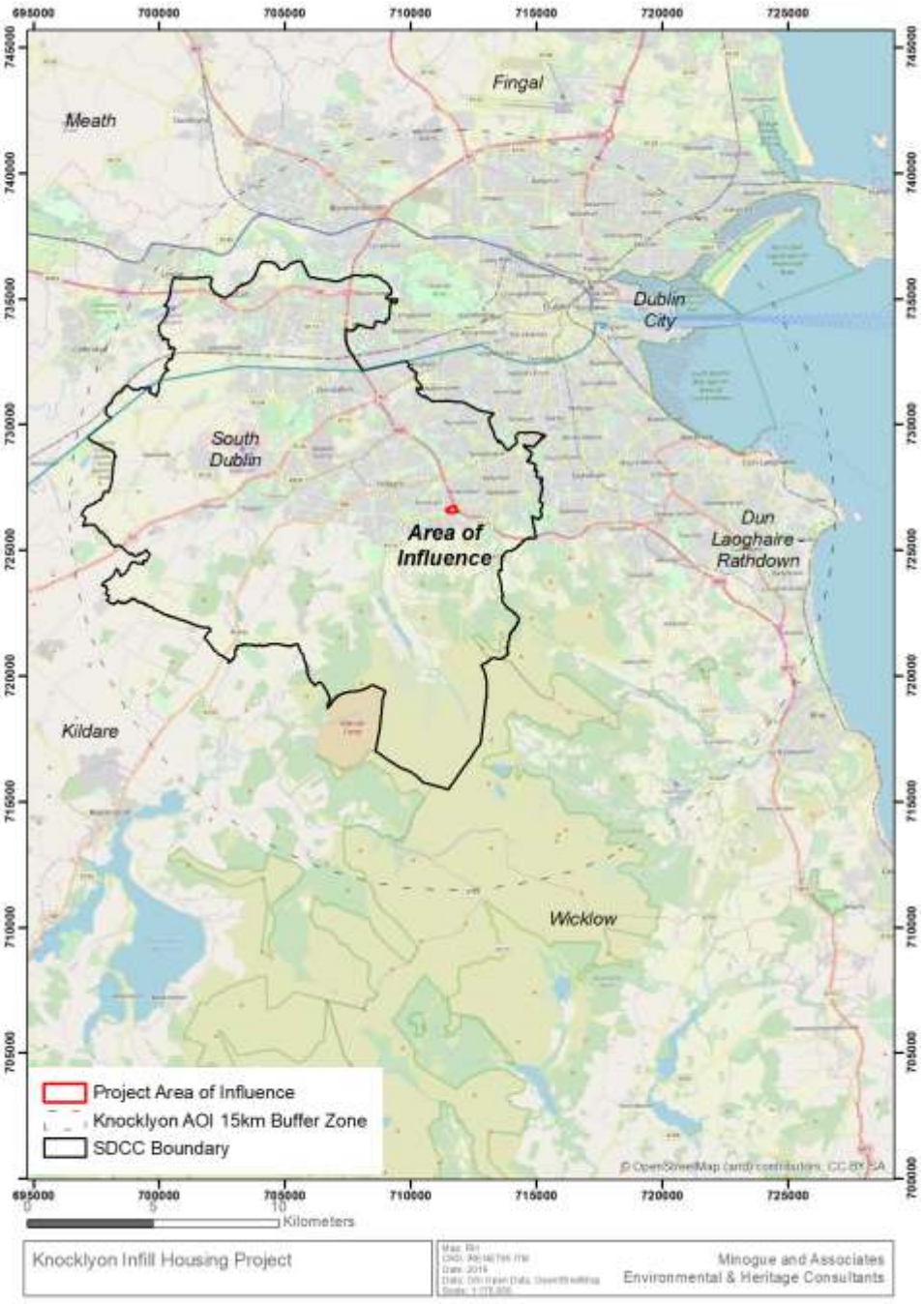
A site visit and walkover was undertaken on 23rd April 2019 by Ruth Minogue (BSocSc, MA, MCIEEM) of Minogue and Associates. The EIA Screening exercise has been compiled by Ruth Minogue who has twenty years' experience as an environmental consultant. She has particular expertise in environmental assessment including EIA and Strategic Environmental Assessment. Ruth is a full member of the Institute of Ecology and Environmental Management and the Irish Environmental Law Association. Recent CDP training includes the Advanced Diploma in Planning and Environmental Law (Kings Inn, 2017), GQIS for ecologists (IEEM, Feb 2019) and webinar on bats and lighting (IEEM, March 2019).

# 2 Description of the Proposed Development

## 2.1 Site Location and Description

The proposed site is located in the townland of Knocklyon, South Dublin County. The proposed development area is located on lands associated with a football club and covers approximately 3.68 ha. The site is surrounded by residential development to west (Glenlyon Park) and North (Castlefield), and two roads to east and south - the M50 (junction 12) and St Colmcille's Way (R113) respectively. The development lands are located approximately 90m above Ordnance Datum. Figure 1 shows the site in relation to the wider area.

**FIGURE 1 SITE LOCATION**



## 2.2 Description of Development

The project is to provide units of social and affordable housing in the northeastern part of the site. The existing football clubhouse will be retained with two existing pitches retained. The other two pitches will be relocated by SDCC. The development description are as follows:

New access road off St. Colmcille's Way, landscaping works to boundaries, re- arrangement of existing playing pitches and new park/play area and all necessary associated ancillary works on the site and adjacent areas. All houses to be minimum A2 BER rated. The housing provision comprises 21 two storey houses and 2 three storey apartment blocks grouped in terraces.

### 2.2.1 Duration of Construction

The duration of construction is 52 weeks and will provide the following housing:

### 2.2.2 Construction Approach

The housing will be delivered using timber frame and steel frame construction and will be delivered via a Design Build Contract.

Access will be via the existing lane used by the football club off the Colmcille Way.

### 2.2.3 Landscaping proposals

Landscaping proposals will consider providing nectar rich flowers for insects across the season. Removal of undergrowth and weed plants will be carried out on site. Supplementary planting will be provided to boundaries and within the project, mainly through planting of suitable slow growing native trees. Permeable paving will be provided to curtilage of units. Approach roads and pavements will be tarmac/concrete to SDCC Roads taking in charge standard. Surface water attenuation will be provided by 'Stormteck' or similar approved system.

## 2.3 Mitigation Measures

### 2.3.1 Construction Environmental Management Plans (CEMPs)

CEMPs typically provide details of intended construction practice for the proposed development, including:

a) location of the sites and materials compound(s) including area(s) identified for the storage of construction refuse.

b) location of areas for construction site offices and staff facilities

c) details of site security fencing and hoardings

d) details of on-site car parking facilities for site workers during the course of construction-

e) details of the timing and routing of construction traffic to and from the construction site and associated directional signage-

f) measures to obviate queuing of construction traffic on the adjoining road network.

g) measures to prevent the spillage or deposit of clay, rubble or other debris-

h) alternative arrangements to be put in place for pedestrians and vehicles in the case of the closure of any public right of way during the course of site development works-

i) details of appropriate mitigation measures for noise, dust and vibration, and monitoring of such levels-

j) containment of all construction-related fuel and oil within specially constructed bunds to ensure that fuel spillages are fully contained; such bunds shall be roofed to exclude rainwater-

k) disposal of construction/demolition waste and details of how it is proposed to manage excavated soil

l) a water and sediment management plan, providing for means to ensure that surface water runoff is controlled such that no silt or other pollutants enter local water courses or drains.

m) details of a water quality monitoring and sampling plan

n) if peat is encountered - a peat storage, handling and reinstatement management plan

o) measures adopted during construction to prevent the spread of invasive species (such as Japanese Knotweed).

A suggested CEMP is provided below:

A CEMPS shall be prepared in advance of the physical elements proposed and will be implemented throughout. Such plans shall incorporate relevant mitigation measures indicated below.

Where works are undertaken in/adjacent to sensitive environmental receptors all construction/maintenance staff will be inducted by means of a "Tool-box Talk" which will inform them of environmental sensitivities and the best practice to be implemented to avoid disturbance to these receptors.

All construction and maintenance works will be undertaken in accordance with the following guidance documents:

- Inland Fisheries Ireland's Requirements for the Protection of Fisheries Habitat during Construction and Development Works.
- CIRIA (Construction Industry Research and Information Association) Guidance Documents
- Control of water pollution from construction sites (C532)
- Control of water pollution from linear construction projects: Technical Guidance (C648)
- Control of water pollution from linear construction projects: Site Guide (C649)
- Environmental Good Practice on Site (C692)
- NRA Guidance Documents
- Guidelines for the Crossing of Watercourses during the Construction of National Road Schemes
- Guidelines for the Management of Noxious Weeds and Non-Native Invasive Plant Species on National Roads
- Guidelines for the Protection and Preservation of Trees, Hedgerows and Scrub Prior to, during and Post Construction of National Road Schemes

Any excavations and/or vegetation removal will minimised during construction and/or maintenance works.
Excavated material will not be stored immediately adjacent to watercourses.
Disturbance to natural drainage features should be avoided during the construction and/or maintenance.

Construction machinery should be restricted to public and or site roads. As a general rule machinery should not be allowed to access, park or travel over areas outside the footprint of proposed housing development.

Suitable prevention measures should be put in place at all times to prevent the release of sediment to drainage waters associated with construction areas and migration to adjacent watercourses To reduce erosion and silt-laden runoff, create, where possible, natural vegetation buffers and divert runoff from exposed areas, control the volume and velocity of runoff, and convey that runoff away from watercourses.

Where necessary drainage waters from construction areas should be managed through a series of treatment stages that may include swales, check dams and detention ponds along with other pollution control measures such as silt fences and silt mats.

Where vegetation removal associated with treelines, hedgerows, individual mature trees, scrub or woodland is required, this shall only be undertaken outside the breeding bird season, between March and August inclusive.

Where extensive areas of ground are to be exposed during route construction or maintenance dust suppression should be undertaken during periods of dry weather.

All chemical substances required during construction and/or maintenance works will be stored in sealed containers.

Any refuelling or lubrication of machinery will not be undertaken within 50m of a watercourse

Spill kits will be required on site during construction and/or maintenance works.
Ensure non-native, invasive species do not occur at construction/maintenance areas, or if occurring, are not spread as a results of works. The NRA Guidance on invasive species, outlined above will be adhered to as well as the preparation and implementation of a site specific Invasive Species Management and Control Plan.

Disseminate information on sensitive ecological receptors, such as sensitive habitats, breeding birds etc. occurring adjacent to or in the wider area. This information will aim to educate recreational users on the conservation status and sensitivities of such receptors to encourage responsible usage of the area.

### 2.3.2 LANDSCAPING PLAN

Additional measures are recommended to inform the landscaping plan as follows:

1. Retention of hedgerow and treelines along the western and northern boundary

2. Additional tree planting along the southern and eastern site to increase environmental buffers for noise and traffic emissions.

## 2.4 Overview of existing Environment

### 2.4.1 Population and Human Health

#### Population

The development is located within a largely urban area in townland of Schollarstown and the Electoral District of Knocklyon-Ballycullen. This electoral district has seen an increase in population over the ten year period of 2006 to 2016, from 6,610 (2006 Census) to 8,230 (2016 Census). At Small Area data (see Figure 2 below), the population as of 2016 Census was 310 persons, a small decline in total population between the 2010 and 2016 census of 0.03%.

Figure 2 shows the Small Area Map for the study area.


**FIGURE 2 SMALL AREA MAP (POBAIL. IE)**

The deprivation score derived from 2016 data is -4.33 indicating marginally below average deprivation.

#### Human Health

Environmental noise

Environmental noise is from long term or permanent sources, like major transport routes and factories. Noise from these sources has a different effect on people and is managed in a different way. The Environmental Noise Directive was written into Irish law in 2006, through The

Environmental Noise Regulations (Statutory Instrument No. 140 of 2006). This law relates to the assessment and management of environmental noise. They provide for a common approach intended to avoid, prevent or reduce the harmful effects, including annoyance, due to exposure to environmental noise. These regulations do not apply to nuisance noise which can be dealt with under the Environmental Protection Agency Act.

The WHO (2011) has identified noise from transport as the second most significant environmental cause of ill health in Western Europe, the first being air pollution from fine particulate matter (AIRS_PO3.1, 2018). Environmental noise exposure can lead to annoyance, stress reactions, sleep disturbance, poor mental health and wellbeing, impaired cognitive function in children, and negative effects on the cardiovascular and metabolic system.

Noise Action Plans are required under the Environmental Noise Directive (EU 2002/49/EC) transposed in to Irish law by SI 140 of 2006. South Dublin in conjunction with the other three Dublin local authorities have prepared a plan for 2013-2018 and establishes the measures that the councils intend to take to manage environmental noise exposure. The plan also contains an assessment of possible noise hotspots throughout the area.

In the context of the project area, existing roads operate as the greatest noise generators.

Thresholds for desirable low and undesirable high sound levels in the Noise Action Plan are as follows:

- Desirable Low Sound levels • < 50 dB(A) Lnight • < 55 dB(A) Lday
- Undesirable High Sound levels • > 55 dB(A) Lnight • > 70 dB(A) Lday

The M50 and some regional roads exceed desirable sound levels for nightime. The 24 hour mapping for major roads reinforced this finding.

Based on the "Draft Advice Notes for Preparing Environmental Impact Statements issued by the EPA" (EPA, 2017), the following types of sensitive receptors should be noted in particular during impact assessment:

- homes;
- hospitals;
- hotels and holiday accommodation; and
- schools and rehabilitation workshops.

Given the sites' proximity to the M50 and the R113, noise and air quality emissions are important considerations. The nearest sound monitoring location is St Colmcille's Community School, on the eastern side of the M50, some 850m from the site. Data for a two week period may be plotted using the data from this monitoring station, this is shown below for the fortnight from 17th April to 1st May 2019. This coincides partly with the school holidays over Easter. Figure 4 shows the preceding fortnight from 3rd April to 17th April 2019 which shows higher sound levels, particularly around peak hours of traffic.

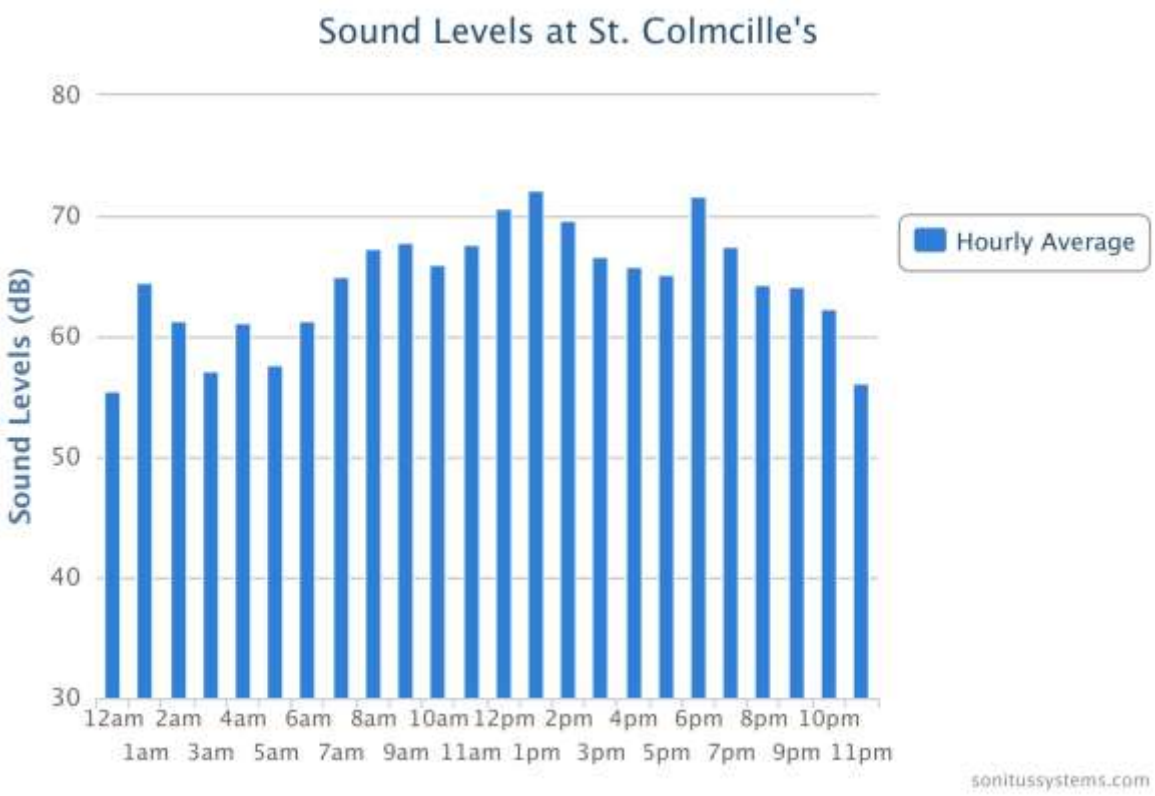



**FIGURE 3 SOUND LEVELS ST COLMCILLES 17TH APRIL TO 1ST MAY 2019**

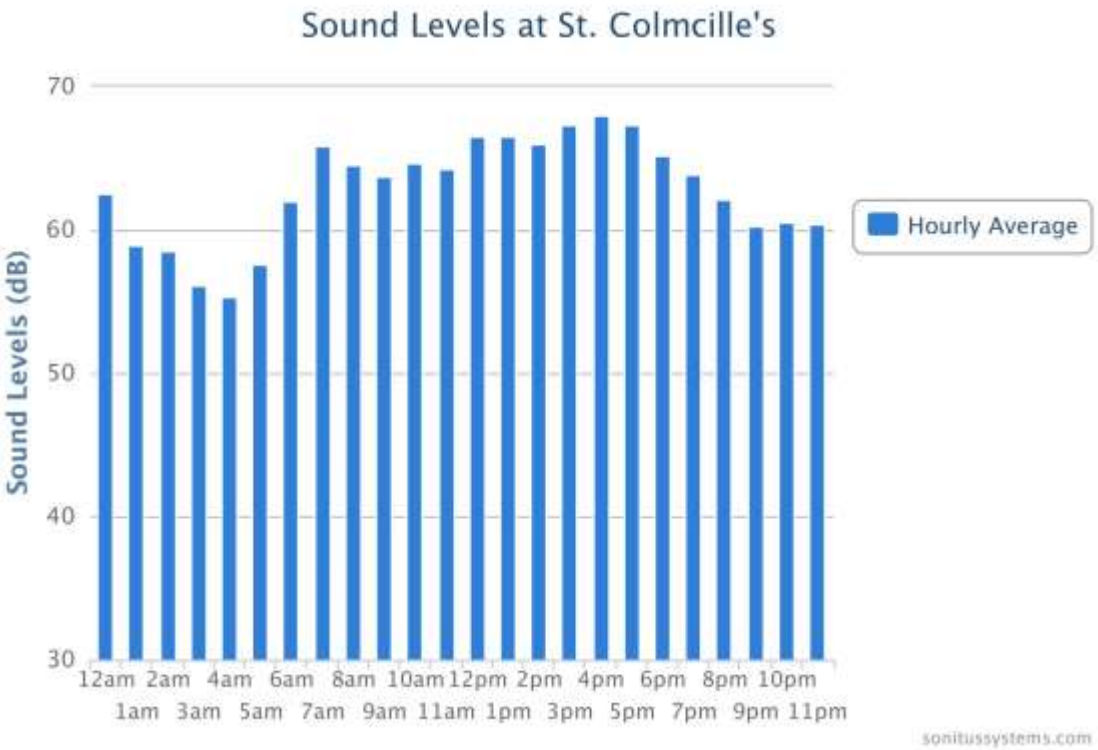



**FIGURE 4 SOUND LEVELS ST COLMCILLES, 3RD TO 17TH APRIL 2019.**

There is little local information available in relation to health and population. However there are strong links between air quality, water quality, material assets and health. Air quality is dependent

on a number of factors including the source of potential pollutants and weather conditions. South Dublin is located within Dublin City Air Quality for Health Index[1] and as of 1st May Air Quality was classified as 'good'. The closest air quality monitoring station to the site is at SDCC County Hall, Tallaght. This station monitors particulate matter ($PM_{10}$) and Sulphur Dioxide($SO_2$). The particulate matter ($PM_{10}$) daily limit of 50 ug $m^{-3}$ is deemed breached if more than 35 exceedances occur in a calendar year. There has been 1 exceedance at this site in 2018. The $SO_2$ hourly limit of 350 ug $m^{-3}$ is deemed breached if more than 24 exceedances have occurred. Recent data for the previous 14 days at this site indicate levels well below the 350 ug $m^{-3}$ threshold.

### 2.4.2 Biodiversity, Flora and Fauna

A site walkover in April 2019 confirmed the following habitats present on site:

- BL3 – Built land and artificial surfaces –associated with the existing club house, parking and access lane.
- GA2 – Amenity grassland, comprising the football pitches, and
- WL1- Hedgerow, grading into treelines WL2 on the northern bank.

These linear features represent the most significant ecological elements on the site. The hedgerow forming the northern boundary is more mature and comprising some mature ash (*F. excelsior)* The western hedgerow boundary is more recent, possibly planted as part of the Glenlyon Park development. Species present along the hedgerows include elder (*S.nigra*), ash (*F.excelsio*). Ground flora associated with these hedgerows include ivy *(Hedera spp*), cow parsley *Anthriscus sylvestris*,, bramble (*Rubus spp*)and dock (*Rumux spp*).

#### Designated sites

A screening statement in support of appropriate assessment accompanies this report. The following table shows the list of Special Areas of Conservation and Special Protection Areas within 15km of the project site. Figure 5 shows proposed Natural Heritage Areas within a 15km buffer of the site.

| SITECODE | SITE_NAME |
|---|---|
| 4006 | North Bull Island SPA |
| 4024 | South Dublin Bay and River Tolka Estuary SPA |
| 4040 | Wicklow Mountains SPA |
| 4040 | Wicklow Mountains SPA |
| 4063 | Poulaphouca Reservoir SPA |
| SITECODE | SITE_NAME |
| 206 | North Dublin Bay SAC |
| 210 | South Dublin Bay SAC |
| 713 | Ballyman Glen SAC |
| 713 | Ballyman Glen SAC |
| 725 | Knocksink Wood SAC |
| 725 | Knocksink Wood SAC |
| 1209 | Glenasmole Valley SAC |
| 1398 | Rye Water Valley/Carton SAC |
| 2122 | Wicklow Mountains SAC |

[1] https://www.epa.ie/air/quality/

2122 Wicklow Mountains SAC

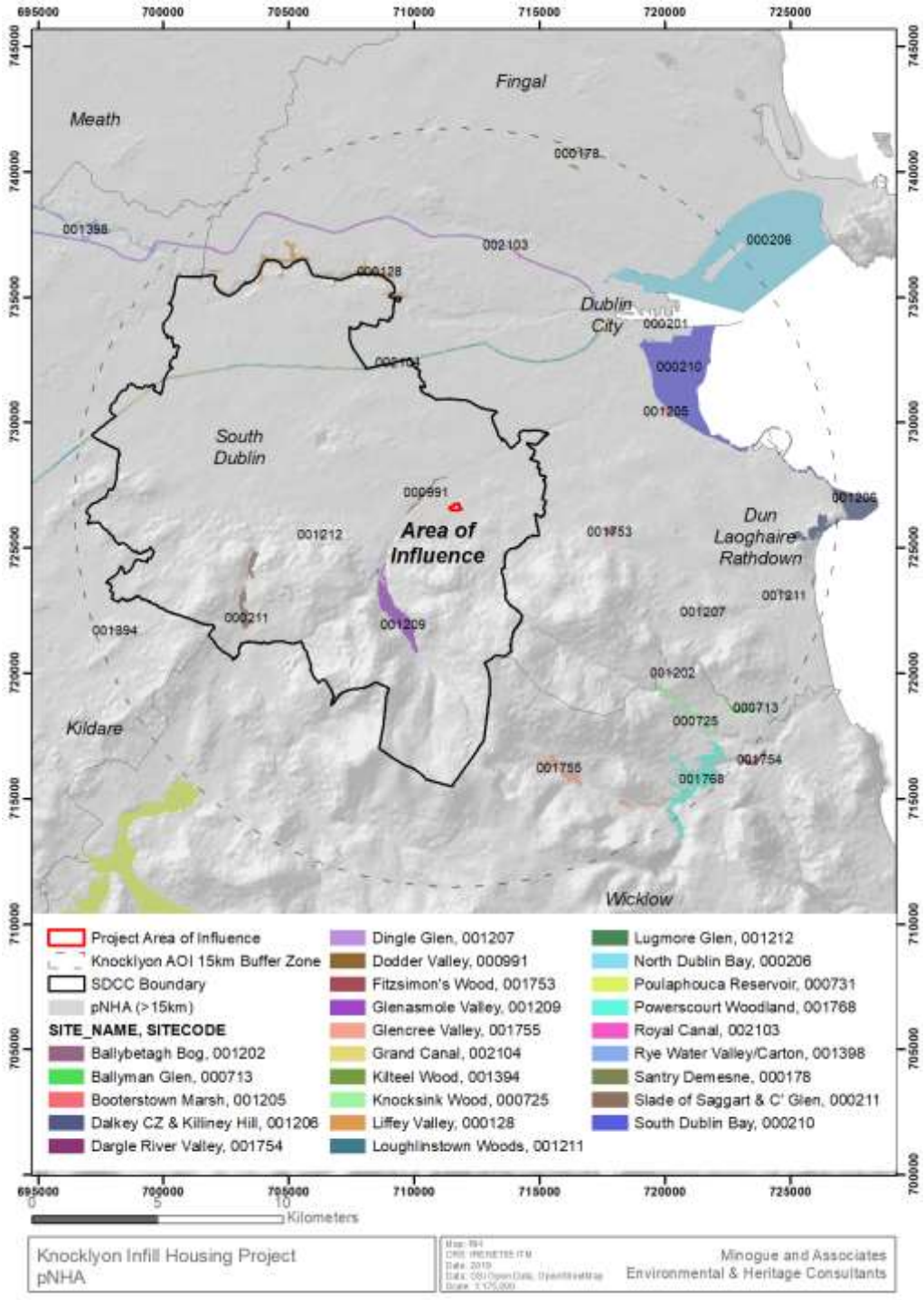



**FIGURE 5 PROPOSED NATURAL HERITAGE AREAS WITHIN 15KM OF PROJECT SITE**

## PROTECTED SPECIES

A 1km grid square (Reference O1126, see figure below) search was undertaken using the National Biodiversity Database and the following records were identified in Table 1.

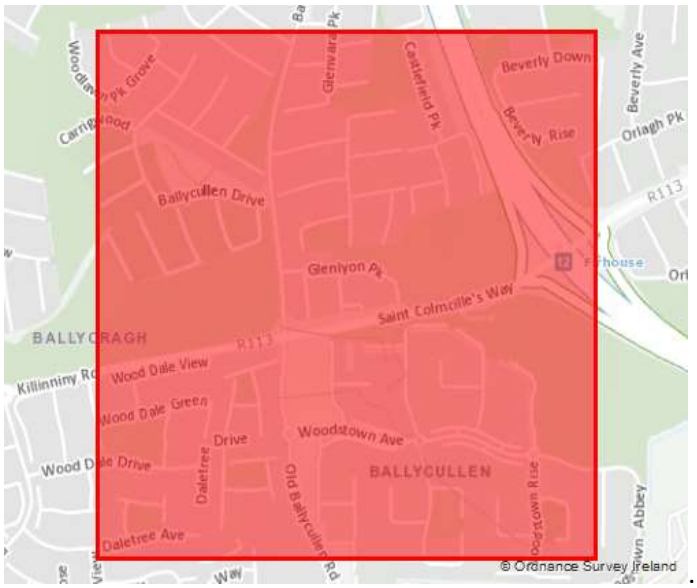


**TABLE 1 NATIONAL BIODIVERSITY CENTRE DATABASE RECORDS**

| Species Group | Species name | County | Date of last record | Title of Dataset | Designation |
|---|---|---|---|---|---|
| amphibian | Common Frog (Rana temporaria) | 1 | 10/04/2003 | Irish National Frog Database | Protected Species: EU Habitats Directive \|\| Protected Species: EU Habitats Directive >> Annex V \|\| Protected Species: Wildlife Acts |
| bird | Common Buzzard (Buteo buteo) | 1 | 22/07/2017 | Birds of Ireland | |
| flowering plant | Cowslip (Primula veris) | 1 | 16/04/2017 | Online Atlas of Vascular Plants 2012-2020 | |
| insect - beetle (Coleoptera) | Brychius elevatus | 1 | 21/10/1902 | Water Beetles of Ireland | |
| insect - beetle (Coleoptera) | Dytiscus semisulcatus | 1 | 31/12/1856 | Water Beetles of Ireland | |
| insect - beetle (Coleoptera) | Enicocerus exsculptus | 1 | 22/10/1902 | Water Beetles of Ireland | Threatened Species: Endangered |
| insect - beetle (Coleoptera) | Hydroporus planus | 1 | 22/10/1904 | Water Beetles of Ireland | |
| insect - beetle (Coleoptera) | Laccobius striatulus | 1 | 21/10/1902 | Water Beetles of Ireland | |
| insect - beetle (Coleoptera) | Nebrioporus (Nebrioporus) depressus | 1 | 22/10/1902 | Water Beetles of Ireland | Threatened Species: Data deficient |
| insect - beetle (Coleoptera) | Stictotarsus duodecimpustulatus | 1 | 22/10/1902 | Water Beetles of Ireland | |

| | | | | | |
|---|---|---|---|---|---|
| terrestrial mammal | Eastern Grey Squirrel (Sciurus carolinensis) | 1 | 31/12/2007 | The Irish Squirrel Survey 2007 | Invasive Species: Invasive Species \|\| Invasive Species: Invasive Species >> High Impact Invasive Species \|\| Invasive Species: Invasive Species >> EU Regulation No. 1143/2014 \|\| Invasive Species: Invasive Species >> Regulation S.I. 477 (Ireland) |
| terrestrial mammal | Eurasian Badger (Meles meles) | 1 | 12/08/2015 | Atlas of Mammals in Ireland 2010-2015 | Protected Species: Wildlife Acts |
| terrestrial mammal | Eurasian Red Squirrel (Sciurus vulgaris) | 1 | 21/05/2017 | Mammals of Ireland 2016-2025 | Protected Species: Wildlife Acts |
| terrestrial mammal | Red Fox (Vulpes vulpes) | 3 | 15/03/2014 | Atlas of Mammals in Ireland 2010-2015 | |

### 2.4.3 WATER RESOURCES

The most recent data for the Water Framework Plans is from the catchments.ie website. A catchment is an area where water is collected by the natural landscape and flows from source through river, lakes and groundwater to the sea. The project lands are situated within the Liffey and Dublin Bay Catchment (code: 09). The area of this catchment covers 1,624,42km$^2$ and supports a total population density of 777 people per km$^2$.

#### SURFACE WATER

A tributary of the Dodder is present along the eastern boundary of the site. This was not accessible during the site walkover due to presence of hedgerows and overgrowth. A watermain also runs along this boundary. This tributary rises in below Montpelier Hill and joins the main branch of the River Dodder further south at the Dodder Valley Park, east of the M50. It is culverted for its length upto entry at the Dodder main channel, some 1.4km south.

Surface water status is classified under the WFD from 'high' to 'bad' status. In measuring this status both ecological and chemical parameters are measured and the overall status is determined by the lower threshold achieved for both ecological and chemical parameters. The latest information from the catchments.ie website shows the overall WFD status of the River Dodder to be Moderate (Q3-4). The River Dodder is classified as being of 'Moderate (Q3-4) as it runs through the sub-catchment and enters the Liffey and Dublin Bay catchment at Ringsend, Dublin City. The estuary as a transitional waterbody under the WFD is classified as moderate (Q3-4). The coastal waterbody of Dublin Bay is regarded as 'Unpolluted'. As such, there have been no breaches of the EPA's threshold values for nutrient enrichment, accelerated plant growth, or disturbance of the level of dissolved oxygen normally present under the EPA's "Trophic Status Assessment Scheme" classification (EPA 2010).

The tributary relevant to the project is classified as moderate overall also.

**FIGURE 6 SURFACE WATER STATUS**

GROUNDWATER

The Geological Survey of Ireland's Groundwater Vulnerability Mapping shows the groundwater vulnerability for the project area within a catchment where groundwater vulnerability is considered Low. The groundwater quality of the area is classified as good.

### 2.4.4 GEOLOGY AND SOIL

The study area is underlain by limestone and is reflected in the soil type present in the study area which is the Straffan series – fine loamy drifts with limestone.

### 2.4.5 CULTURAL HERITAGE

The closest known monument to the development site is an unclassified ringfort at the southeast corner of the lands. This following description is provided by the National Monuments Service[2]:

*Situated in an area of undulating grassland SE of the Dodder valley. Named on the 1843 OS 6-inch map as a roughly circular, hachured enclosure. The site was excavated in 1985 prior to motorway construction (Keeley 1985, 23). It comprised a truncated circular structure (int. diam. 24m) defined by a bank and external fosse. Excavations revealed a D-shaped wooden structure, a hearth and a series of pits and post-holes within the interior. Finds included a flint scraper and a possible loom weight.*

A fulacht fiadh is also recorded just outside the western boundary of the site, no further information is provided.

No buildings or features on the Record of Protected Structures are present on site.

### 2.4.6 LANDSCAPE

The study area is located within the Landscape Character Area, Urban South Dublin, described as follows:

- Built – up urban area with extensive housing estates and industrial /commercial parks. Variety of house styles and layouts dating from the late 19th century to late 20th century
- Settlements of Rathfarnham, Templeogue and Clondalkin with important historical legacy and remnants
- Major traffic corridors with M50 traversing north- south through the area, and LUAS line travelling north from Tallaght, parallel to the M50,to city centre
- Corridors of natural and semi natural vegetation, notably along the River Dodder ( a linear park) and the Camac River
- Grass open spaces in gardens, industrial parks, golf courses, school playing fields, and miscellaneous spaces in housing areas
- Street trees planting
- Recreational facilities – public parks and golf courses - provide amenities and ecological resources

[2] http://webgis.archaeology.ie/historicenvironment/

### 2.4.7 Material Assets

Existing access to the site is through the lane for the football club and this will continue to function as the access lane.

Dublin Bus provides public transport within the immediate area and the closest Luas Stop is at the Square Tallaght some 4.5km.

Almost all of the waste water in South Dublin is currently treated in Ringsend Wastewater Treatment Works which discharges into Dublin Bay. The treated waters are treated to a Tertiary standard, which is in compliance with the Urban Wastewater Treatment Directive. The quality of the discharged waters is within the requirements of the Urban Waste Water Treatment Directive.
The Greater Dublin Drainage Scheme will represent a significant wastewater infrastructure development for the Greater Dublin Regional area which will allow for an underground orbital sewer and two pumping stations, a new wastewater treatment plan at Clonshaugh (in Fingal County) and an outfall pipe located 6km out to sea from Baldoyle Bay. This project is subject to technical studies and a planning application accompanied by an Environmental Impact Statement (EIS) and Natura Impact Statement (NIS) was submitted in 2018, An Bord Pleanala undertook an oral hearing into the application in March 2019.

The project site is located within the Greater Dublin Water Supply Area (GDWSA). The GDWSA is served by 5 major water treatment plants, Ballymore Eustace, Srowland, Leixlip, Ballyboden and Vartry, and a number of smaller sources. The total capacity of current sources and treatment plants is 598ML/day and based on proposed capital investment between 2017 and 2021 this water available from existing sites will increase to 656ML/day.

Wastewater will connect into the existing supply network and water supply will be via the existing supply network.

# 3 Environmental Impact Assessment Screening Exercise

## 3.1 Relevant EIA Legislation

EIA requirements derive from EU Directive 85/337/EEC (as amended by Directive 97/11/EC, Directive 2014/52/EU and S.I. 454 of 2011; S.I. 464 of 2011; S.I. 456 of 2011 and S.I. No 296 of 2018).) on the assessment of the effects of certain public and private projects on the environment. The purpose of this Environmental Impact Assessment Screening Report is to determine whether this proposed development will require full Environmental Impact Assessment. The new legislation requires screening to be undertaken to determine whether or not specified public or private developments are likely to have significant effects on the environment and, as such, require EIA to be carried out prior to a decision on a development consent application being made.

The Directive outlines in Article 4 (1) 21 Annex 1 projects that require mandatory EIA. Article 4 (2) outlines Annex 2 projects that require consideration for EIA further to a case by case examination or through thresholds and criteria established by Member States. Projects requiring mandatory EIA are listed in Schedule 5 of the Planning and Development Regulations 2001, as amended. Where developments are under the relevant EIA threshold, planning authorities are required under Article 103 of the 2001 Regulations, as amended, to request an EIA where it considers the proposed development is likely to have a significant effect on the environment. In these cases the significant effects of the project are assessed relative to the criteria contained in Schedule 7a of the regulations, principally:

- The projects characteristics
- Sensitivity of the project location, and
- Characterisation of potential impacts.

In addition, where the development would be located on or in an area, site etc. set out in Article 103(2), the planning authority shall decide whether the development would or would not be likely to have significant effects on the environment for such site, area or land etc. the implication being that if it decides that it would be likely to have significant effects on the environment, it can invoke its powers to request an EIA.

Article 103(2) sites comprise the following:

a) A European Site;

b) An area the subject of a notice under section 16(2) (b) of the Wildlife (Amendment) Act, 2000;

c) An areas designated as a Natural Heritage Area under section 18 of the Wildlife (Amendment) Act, 2000;

d) Land established or recognised as a nature reserve within the meaning of section 15 or 16 of the Wildlife Act, 1976, as amended by sections 26 and 27 of the Wildlife (Amendment) Act, 2000; or

e) Land designated as a refuge for flora or as a refuge for fauna under section 17 of the Wildlife Act, 1976, as amended by section 28 of the Wildlife (Amendment) Act, 2000.

## 3.2 METHODOLOGY AND GUIDANCE

According to European Commission Guidance (2017[3])

"*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 previously stated, this may be considered a sub-threshold EIA development, as EIA is not mandatory for housing development units under 100 units. The key issue for the competent/consent 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*."

[3] Environmental Impact Assessment of Projects Guidance on Screening (Directive 2011/92/EU as amended by 2014/52/EU). European Commission 2017. Page 23.

A methodology was developed to formally screen the proposed development, which was based on Environmental Impact Assessment (EIA), Guidance for Consent Authorities regarding Sub-Threshold Development (EPA, 2003), the recent 2017 EU guidance referenced above, and the 2018 Guidance issued by the department of Housing, Planning and Local Government. The screening exercise is divided into a section on mandatory EIA and another on sub-threshold EIA. A rationale is provided at the end of each assessment section.

## 3.3 Mandatory Environment Impact Assessment

Further to the above, Schedule 5 of the Planning & Development Regulations 2001, as amended sets out a number of classes and scales of development that require EIA.

With regards to the proposed development, the provisions of Schedule 5 require an EIA to be undertaken where it is proposed to carry out the following -

## 3.4 Projects for the Cumulative Assessment

The proposed development was considered in combination with other projects in the area that could result in cumulative effects on the environment.

The online planning system myplan.ie was consulted on the 1st May 2019 for the subject lands and immediate surrounds. Within the past three years there has been a total of 7 applications with associated decisions made by the local authority were returned for the last 3 years and comprised:

- Five regarding renovation/extension works to existing dwellings, all approved.
- Two applications for construction of new dwellings refused.

## 3.5 Sub-threshold Assessment

### 3.5.1 Characteristics of the Proposed Development

Having considered the above environmental factors the aim of the next section is to address likely impacts on the environment by the implementation of the proposed development. Whether an EIA would be deemed relevant to the scale of the project and the environment will then be determined. The following sections presents the EIA Screening Report based on the criteria contained in Schedule 7 of S.I. 296 of 2018 and are grouped under the following headings.

1. Characteristics of the Proposed Development - Table 3a
2. Location of the Proposed Development - Table 3b and
3. Characteristics of Potential Impact Tables 3c and 3d

Table 3a Characteristics of the Proposed Development

| **Screening Question** | **Response** |
|---|---|
| 1. Characteristics of projects<br>The characteristics of projects must be considered, with particular regard to: | |
| (a) the size and design of the whole project | The project lands in total comprise a greenfield area of 3.6 ha of which the housing development will comprise the north eastern corner of the site.<br>Services including water, wastewater and access will utilise existing services that are confirmed to have sufficient capacity for same. |

| Screening Question | Response |
|---|---|
| 1. Characteristics of projects<br>The characteristics of projects must be considered, with particular regard to: | |
| | |
| (b) cumulation with other existing and/or approved projects; | As Section 3.5 shows the potential for cumulation with other approved projects in the study area is not identified as giving rise to significant environmental effects.<br><br>The project lands do not overlap physically with any European sites.<br><br>Landscaping will also provide for some additional enhancement planting including native species and pollinator friendly planting. Additional planting is also included in relation to noise and air quality.<br><br>It is considered that cumulative impacts, if any, are most likely to arise during the construction phase.<br><br>During construction, the most significant potential for adverse cumulative impact is in the potential for increased surface run off, soil sealing and water pollution arising from works within development footprint<br>The adherence and full implementation of mitigation measures including the CEMP as outlined in Section 2.3 of this report will ensure no potential for cumulative impacts to arise.<br><br>In conclusion, for the above reasons, the potential for adverse cumulative effects in relation to proposed and approved projects and the proposed development are not identified as significant for the reasons outlined above and in addition the provisions of the CMP which are considered sufficient to avoid significant negative cumulative effects in relation to potential construction activities... Given the existence of such management controls, it is considered that the cumulative impacts can be mitigated during construction and will be inconsequential during operational phases in the long term. |
| (c) the use of natural resources, in particular land, soil, water and biodiversity; | Natural resources relating to soil and water will be used as part of the works.<br>Management and reuse of stripped topsoil can be used to inform the landscaping plan.<br>Minor amounts of water and fuel will be used to clean machinery and fuel machinery required during construction works. |
| (d) the production of waste; | Yes, but not significant.<br>Solid waste may be produced during construction but materials will be only ordered as required. Any wastes from the construction process will either be reused within the scheme, or recycled/disposed of at an authorised waste facility. |
| (e) pollution and nuisances; | The construction phase presents the greatest risk of pollution to water resources. Potential sources of water pollution to both |

| Screening Question | Response |
|---|---|
| 1. Characteristics of projects<br>The characteristics of projects must be considered, with particular regard to: | |
| | surface and groundwater include fuel, lubricants, suspended solids and concrete.<br><br>Potential pollution to water resources from operation include increased surface run off containing suspended solids.<br>Potential risks also arise in relation to invasive species spread via water vectors or coming on site.<br>Specific measures are included as part of the CEMP to address same.<br><br>Potential impacts may arise in relation to noise, air quality and dust during the construction of the development but these will be temporary in nature and again adherence to measures in the Construction Management Plan will mitigate such impacts. |
| (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; | The risk of major accidents are not considered to be significant subject to best construction practices being followed through the construction phase. This will include proper site management, maintenance and operation of all machinery and works associated with the construction phase, on site safety and training. |
| (g) the risks to human health (for example due to water contamination or air pollution). | As above, significant risks to human health are not identified for this proposal. The environmental protection measures, particularly for the construction phase are detailed in Section 2 and subject to full and proper implementation, potential risks associated with construction activity will not arise.<br>Given the proximity to the M50 additional mitigation measures for tree planting is provided in the overall landscaping design.. |
| Will the proposed development create a significant amount of nuisance during its construction or operation? | The subject lands are situated within an established urban area comprising residential and transport use.<br>Mitigation measures in the Construction Environmental Management plan will include measures to reduce construction disturbance (such as noise, dust, traffic) on residents during the construction phase.<br>It is not anticipated that significant noise levels will arise during construction (they will be temporary and restricted to machinery associated with surfacing) and operational noise is not identified as being significant. |

**Conclusion: No significant effects likely to arise associated with the characteristics of the proposed development.**

**Rationale:** The scale and extent of the works proposed are relatively small in scale and size. Measures including SUDs, retention of existing hedgerows where possible and minimising the loss of same, additional tree planting and CMEP contribute to minimise adverse effects on biodiversity and water quality.

TABLE 3B LOCATION OF THE PROPOSED DEVELOPMENT

| **Screening Question** | **Response** |
|---|---|
| The environmental sensitivity of geographical areas likely to be affected by projects must be considered, with particular regard to: (a) the existing and approved land use; | The existing landuse comprises a recreational use through football pitches and clubhouse. The footprint of the project site comprises amenity grassland of low ecological value. |
| (b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground | The footprint comprises amenity grassland. The tributary of the River Dodder is culverted for its length. The retention of hedgerows and treelines will be incorporated into the overall landscape plan. The amenity grassland is of low ecological value and whilst it is noted that certain bird species can feed on these grasslands, given its proximity to two busy roads, this area is not considered significant for same. |
| (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 national legislation; Natura 2000 areas designated by Member States pursuant to Directive 92/43/EEC and Directive 2009/147/EC; | The proposed development is not going to significantly increase surface run off as it has been designed with a number of SUDs measures and best practice construction measures will apply to avoid effects on surface water. (i) no interaction or works are proposed that will affect wetlands, riparian areas or river mouths. (ii) not applicable (iii) not applicable (iv) not application (v) the screening for appropriate assessment has determined no likely significant effects, alone or in combination with other projects on European Sites. |
| (vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure; | Whilst surface water quality within the wider area is variable, there are no direct or indirect effects identified for the project and potential risks to these surface waters. The greatest risk would relate to the construction phase and detailed measures in Section 2 will apply. |
| (vii) densely populated areas; | The subject lands are located within an urban location.<br><br>No significant negative effects are identified in relation to this criteria. |
| (viii) landscapes and sites of historical, cultural or archaeological significance | The proposed development is not considered likely to directly impact on archaeological sites or protected structures. The archaeological site is retained in situ and is not proposed for any works. |

**Conclusion: No significant effects likely to arise associated with the location of the proposed development.**

**Rationale:** The proposed development relates to a relatively small area of amenity grassland.

The screening process assesses the most significant potential impacts in relation to the themes outlined below in Table 4c. These are considered as follows:

The likely significant effects of projects on the environment must be considered in relation to criteria set out in points 1 and 2 of this Annex, with regard to the impact of the project on the factors specified in Article 3(1), 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 approved projects;
(h) the possibility of effectively reducing the impact.

## Table 4c- Characteristics of Potential Impacts on environmental parameters

| Environmental Topic | Potential Impact |
|---|---|
| Human Beings | Potential temporary negative impacts to residents associated with construction activities.<br>The CEMP and timing of construction works will be used to reduce and avoid disturbance. Moreover the approach to construction reduces on the on site construction works and minimises excavation works and associated noise. |
| Flora and Fauna | Enhancement measures including those in the landscape plan are provided<br>Construction Environmental Management Plan and SUDs design to address potential hydrocarbon and suspended solids run off.<br>The construction phase represents the greatest potential risk to water quality and flora and fauna, and measures applied in Section 2 will reduce this risk and provide good practice in construction. |
| Soil and Geology | The construction approach minimises impacts on soil and geology as proposed for timber or steel frame construction |
| Water | If not mitigated, surface water quality impacts arising from the construction stage could arise.<br>As stated above, potential increase run off associated with impermeable surfaces is avoided due to the project design. |
| Air Quality and climate | Localised impacts arising from construction machinery.<br>Traffic emissions will increase during key phases. Emissions during works phase will be minimized through best practice and the construction approach reduces overall construction time. |
| Noise and Vibration | Noise during the construction phase may result in nuisance however, |

| Environmental Topic | Potential Impact |
|---|---|
| | noise and vibration during works phase will be minimized through best practice. . |
| Cultural Heritage | It is not anticipated that effects are cultural heritage are significant. |
| Landscape | The proposed development does not represent a significant change in landscape character within the existing urban character |
| Interrelationship between above parameters | The key interrelationship arises between water, biodiversity and landscape.<br>Measures to avoid adverse effects on these parameters are included in Section 2.5 Mitigation Measures. |

**Conclusion: No significant effects likely to arise associated with the potential impacts on environmental parameters.**

**Rationale:** As the preceding table shows, potential impacts relate primarily to temporary impacts at construction stage and the implementation of the Best Practice Construction measures will provide safeguards to avoid significant impacts at this stage.

## Table 4d Characteristics of the potential impacts

| **Characteristics of potential impacts**<br>**The potential significant effects of proposed development in relation to criteria set out under Tables 4.b. and 4.c above, and having regard in particular to:** | |
|---|---|
| (a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected); | Minor and localized temporary impacts are identified primarily at construction stage only. |
| (b) the nature of the impact; | The potential impacts relate primarily to habitat loss and specific measures have informed the landscaping plan.<br>The area is already subject to considerable human activity through residential development and the transport corridors on the eastern and southern boundaries of the site, in addition the greenfield area is already in use as a football club. |
| (c) the transboundary nature of the impact; | Potential transfrontier impacts are not identified. |
| (d) the intensity and complexity of the impact; | Whilst best practice guidelines and adherence to statutory requirements will address and mitigate for several environmental parameters during the design, construction and operation process; the principal potential impacts relate to water quality, biodiversity. |
| (e) the probability of the impact; | The design of the proposals, best practice construction measures mitigates against significant effects arising. |
| (f) the expected onset, duration, frequency and reversibility of the impact; | Subject to implementation and adherence to measures in Section 2, impacts identified for topics are not significant and will be temporary in nature relating to the construction phase, and occasional (and mitigated against) in relation to the operational phase. |
| (g) the cumulation of the impact with the impact of other existing | The cumulative impact of the permitted developments and the proposed project are predicted to cause Negligible impacts |

| | |
|---|---|
| and/or approved projects; | during the construction and operational phase |
| (h) the possibility of effectively reducing the impact. | Measures are detailed in Section 2 and are derived from best practice guidelines. |

**Conclusion: No significant effects likely to arise associated with the characteristics of the potential impacts.**

**Rationale:** Localised and temporary impacts are identified associated with construction and operation. The mitigation measures in the Construction Management are designed to ensure that should construction commence on the project, significant adverse effects are avoided.

# 4 CONCLUSION

## 4.1 SCREENING CONCLUSION

The proposed development does not trigger the threshold for mandatory EIA/EIAR as set in EU Directive 85/337/EEC (as amended by Directive 97/11/EC, Directive 2014/52/EU and S.I. 454 of 2011; S.I. 464 of 2011; S.I. 456 of 2011 and S.I. No 296 of 2018) and has been assessed as a sub threshold EIA development. This EIA Screening Assessment has determined that the characteristics of the proposed development are considered not significant due to the scale and nature of the proposed development and its footprint, which is confined to an area of less than 4 ha, the characteristics and sensitivities of the receiving environment and design and mitigation measures that will be implemented as part of the construction phase and operation phase of the proposed development.

Given the scale and nature of the project and taking account of all available information, 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, as summarised in Table 4a to 4d above.

No significant environmental impacts will occur once mitigation measures outlined in Section 2 of this Report are implemented. These mitigation measures are representative of standard industry environmental management that are implemented to minimise the impact of projects to the environment.

The information provided in this EIA Screening Report can be used by the competent authority, South Dublin County Council, to conclude and determine that an EIA is not required for the proposed development relating to the proposed development as there will be no significant effects.
The overall conclusion for this screening appraisal is that, having considered the appropriate criteria, Environmental Impact Assessment for the project is not required.

# REFERENCES

Environmental Impact Assessment of Projects Guidance on Screening (Directive 2011/92/EU as amended by 2014/52/EU). European Commission 2017

Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment August 2018 Prepared Dept of Housing, Planning and Local Government