

Environmental Impact Screening Report

**Strategic Housing Development on
lands at Delgany, Co. Wicklow**

September 2020



TABLE OF CONTENTS

1	INTRODUCTION	1
2	SITE 1	
3	RELEVANT DEVELOPMENT PLAN	2
4	RELEVANT LEGISLATION FOR SCREENING EIA	2
4.1	EU Directive as amended and associated transposing regulations.....	2
4.2	Section 28 Guidelines Environmental Impact Assessment.....	3
4.3	Sub threshold development.....	4
5	METHODOLOGY	5
6	FRAMEWORK OF FURTHER ASSESSMENT - ABP GUIDANCE	12
7	CONCLUSION	15

1 Introduction

This report provides an Environmental Impact Assessment screening for a proposed Strategic Housing Development (SHD) at a site c.6.08 ha located between Convent Road (L1027) and Bellevue Hill Road (L103) consisting of the former Carmelite Monastery Lands, Delgany, Co. Wicklow. The proposed development consists of 232 no. residential units, a creche, change of use from church to a community facility, a management office, demolition works, new entrances, landscaping, parking and site development works.

2 Site

The site is located c.1.2km east of exit 10 on the N11. The site of 6.08ha consists of a greenfield to the west and north east and a former convent and associated structures to its east. It is bounded to the west by Bellevue Hill and to the west by Convent Road. The site is irregular in shape and has varying levels. There is a change in level of c.20 m in an easterly direction and a change in level of c.10m in north-south direction, the highest point being the stonewall to the north-west, rising at 86.02m AOD, whereas the eastern boundary wall rises at 66.19m AOD.

Until recently, the site was the home of a Carmelite Convent. The convent is composed of a suite of buildings dating from various times, starting in the 1800s, with the latest structure dating from the 2000s. A chapel dating from 1853, a two-storey house dating from 1835-1850, a gate lodge, a stable building form part of the overall convent lands. There are mature trees and hedgerows in and around the site in various conditions.

The site is located to the east of the Delgany Golf Club. Suburban type housing developments bound the site to its east, west, south and north. There is a greenfield site located to the north east of the site. The western boundary comprises a low stone wall and the eastern boundary consists principally of railing over a wall. The site is located 300m north of the local service centre of Delgany. The nearest bus stop is located on Church Road, 300m south east from the site. The site is not designated for the protection of landscape or natural or cultural heritage.

The EPA mapping designates the subsoils as a mix of manmade and Sandstone and shale till (Cambrian/Precambrian) with matrix of Irish Sea Basin origin. The Air Quality Index Regions designates the area as Zone ID 8 as good.

The Three Trout Stream is located c 320 m south of the application site. A stream traverses a portion of the northern part of the site but is not included in the EPA mapping and enters a culvert.

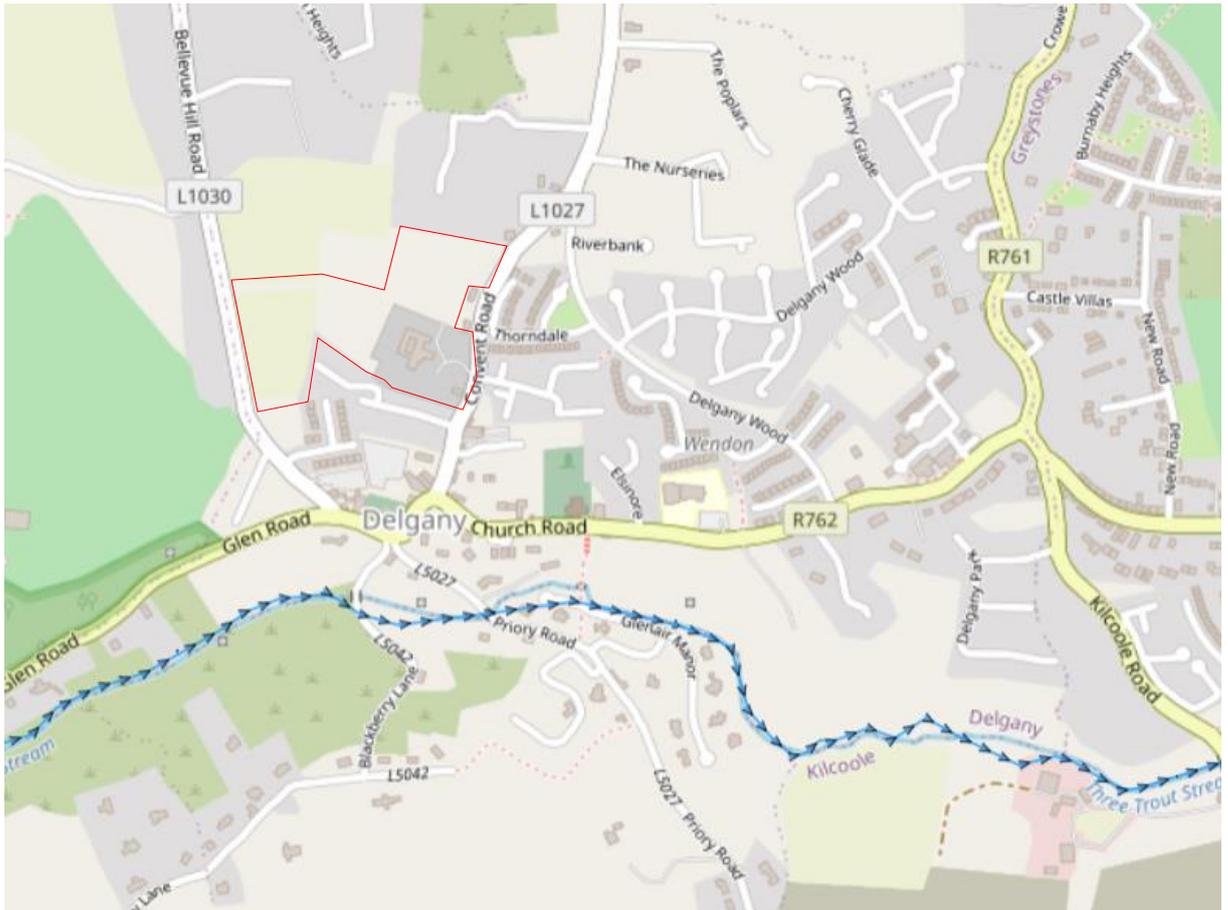


Fig. 1 EPA mapping extract and approximate site outline

3 Relevant Development Plan

The Wicklow County Development Plan 2016-2022 and the Greystones-Delgany & Kilcoole Local Area Plan 2013-2019 are the applicable plans.

4 Relevant legislation for screening EIA

4.1 EU Directive as amended and associated transposing regulations

Directive 2014/52/EU amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment came into effect on May 16th, 2017.

The European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) transpose the requirements of Directive 2014/52/EU, amending previous Directive 2011/52/EU, on the assessment of the effects of certain public and private projects on the environment (the EIA Directive) into planning law with effect from 1st September 2018. The regulations amend the Planning and Development Regulations 2001.

The primary objective of the EIA Directives is to ensure that projects which are likely to have significant effects on the environment are subject to an assessment of their likely effects.

Directive 2014/52/EU does not make any amendments to the list of projects set out in the two annexes to the 2011 Directive. In the Irish legislation, Annexes I and II are broadly transposed by way of the Planning and Development Regulations 2001, as amended, in Schedule 5 Parts 1 and 2, with national thresholds added to certain Part 2 classes of development.

Art 92 of the Planning and Development Regulations 2001 as amended provides that;

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

Schedule 5 Part 1 projects require EIA if the stated threshold set therein has been met or exceeded or where no thresholds are set.

Schedule 5 Part 2 projects meeting or exceeding national thresholds set out therein, or where no thresholds are set, require EIA.

Schedule 5 Part 2 Sub-threshold projects require screening for EIA, except in cases where the likelihood of significant effects can be readily excluded.

The new Annex II A, is transposed into the Planning and Development Regulations 2001 as amended, by the insertion of schedule 7A - *information to be provided by the applicant or developer for the purposes of screening sub-threshold development for environmental impact assessment*. Schedule 7A is an expanded schedule to schedule 7.

4.2 Section 28 Guidelines Environmental Impact Assessment

The revised Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment August 2018 are issued under section 28 of the Planning and Development Act 2000, as amended, replacing the 2013 Guidelines, and accordingly planning authorities and An Bord Pleanála are required to have regard to the revised guidelines in the performance of their planning functions.

The Guidelines provides a glossary as follows:

Screening

The process of determining if development of a class prescribed in Part 2 of Schedule 5 to the 2001 Regulations that does not equal or exceed a threshold specified in that Schedule in respect of that class is likely to have significant effects on the environment and should be made the subject of EIA

Source-Pathway-Target Model

A model identifying the source of likely significant impacts, if any, the environmental factors which will potentially be affected and the route along which those impacts may be transferred from the source to the receiving environmental factors.

2001 Regulations

The Planning and Development Regulations 2001 – 2018 (as amended by the Transposing Regulations, S.I. No. 296 of 2018).

The Guidelines provide that for 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. The examination should have regard to the criteria set out in Schedule 7 to the 2001 Regulations. A preliminary examination is undertaken, based on professional expertise and experience, and having regard to the 'Source – Pathway – Target' model as defined above.

Screening is the initial stage in the EIA process and determines 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. A screening determination is a matter of professional judgement, based on objective information relating to the proposed project and its receiving environment. Environmental effects can, in principle, be either positive or negative.

4.3 Sub threshold development

Art 92 of the 2001 Regulations as amended, provides that sub-threshold development means development of a type set out in Part 2 of Schedule 5 which does not equal or exceed, as the case may be, a quantity, area or other limit specified in that Schedule in respect of the relevant class of development;

Sub-threshold projects in Schedule 5 Part 2 require screening for EIA, except in cases where the likelihood of significant effects can be readily excluded.

Schedule 5 Part 2 provides the following projects/thresholds.

10. Infrastructure projects

(a) ...

(b) (i) Construction of more than 500 dwelling units.

(ii) Construction of a car-park providing more than 400 spaces, other than a car-park provided as part of, and incidental to the primary purpose of, a development.

..

(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.

Having regard to the above thresholds, the application for 233 residential units on a site 6.08 ha (with parking c420 spaces provided as part of, and incidental to the development) is sub threshold development.

Art 103 as amended, provides in Subsection (1) (a) where an application for sub-threshold development is not accompanied by an EIAR, the planning authority shall carry out a preliminary examination of, at the least, the nature, size or location of the development. If they conclude there is significant and realistic doubt in regard to the likelihood of significant effects on the environment it shall, require the applicant to submit to the authority the information specified in Schedule 7A for the purposes of a screening determination unless the applicant has already provided such information which may be submitted without being requested.

A planning authority shall, in making its screening determination whether there is no real likelihood of significant effects on the environment arising from a proposed development or there is a real likelihood of significant effects on the environment arising from a proposed development, have in summary regard to—

- (i) the criteria set out in Schedule 7,
- (ii) the information submitted pursuant to Schedule 7A,
- (iii) the further relevant information, if any,
- (iv) the available results, where relevant, of preliminary verifications or assessments of the effects on the environment
- (v) in respect of a development which would be located on, or in, or have the potential to impact on—
 - (I) a European site,
 - (II) an area the subject of a notice under section 16 (2)(b) of the Wildlife (Amendment) Act 2000 (No. 38 of 2000),
 - (III) an area designated as a natural heritage area under section 18 of the Wildlife (Amendment) Act 2000,
 - (IV) land established or recognised as a nature reserve within the meaning of section 15 or 16 of the Wildlife Act 1976 (No. 39 of 1976),
 - (V) land designated as a refuge for flora or as a refuge for fauna under section 17 of the Wildlife Act 1976,
 - (VI) a place, site or feature of ecological interest, the preservation, conservation or protection of which is an objective of a development plan or local area plan, draft development plan or draft local area plan, or proposed variation of a development plan, for the area in which the development is proposed, or
 - (VII) a place or site which has been included by the Minister for Culture, Heritage and the Gaeltacht in a list of proposed Natural Heritage Areas published on the National Parks and Wildlife Service website,

the likely significant effects of the development on such site, area, land, place or feature, as appropriate.

An Appropriate Assessment screening and an Ecological Impact Assessment accompanies the application.

5 Methodology

The following screening has had regard to the following

- Planning and Development Act 2000 as amended
- Planning and Development Regulations 2001 as amended
- Directive 2014/52/EU of 16 April 2014 amending Directive 2011/92/EU
- The European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018)
- Draft Guidelines on the information to be contained in Environmental Impact Assessment Reports, Environmental Protection Agency, 2017
- Environmental Impact Assessment of Projects: Guidance on Screening, European Commission, 2017

- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment August 2018
- Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding Sub-threshold Development 2003
- Circular Letter: PL 05/2018 27th August 2018. Transposition into Planning Law of Directive 2014/52/EU amending Directive 2011/92/EU on the effects of certain public and private projects on the environment (the EIA Directive) and Revised Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment.

5.1.1 *Information provided*

Schedule 7a -Information to be provided by the applicant or developer for the purposes of screening sub-threshold development for environmental impact assessment.

1. A description of the proposed development, including in particular—

(a) a description of the physical characteristics of the whole proposed development and, where relevant, of demolition works, and

The proposed development is described in paragraph 1 above.

(b) a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.

The application site consists of a former convent and a field. The site is not an area of scenic protection. It contains several protected structures. The general area can generally be described as typical suburban area, with low-density residential development. To the south is located a local centre which include small shops and other retail units. The lands are fully serviced. An existing open drain is located near the northern boundary and an empty drainage pond to the south. There is a former agricultural access to the west via Bellevue Hill Road and an existing vehicular access to the east via Convent Road. Some 300m south, the Three Trout Stream flows in an easterly direction. The Glen of the Downs Special Area Conservation (SAC) and proposed Natural Heritage Area (pNHA) is located some 600m to the south west of the site, it overlaps with the Delgany Golf Course. The application lands are topographically lower than the golf course.

An Appropriate Assessment Screening has therefore been carried out. It concludes that no risk of direct or indirect impacts beyond a reasonable scientific doubt occurs on any Natura 2000 sites and that appropriate assessment is not required.

2. A description of the aspects of the environment likely to be significantly affected by the proposed development.

The subject lands, a mix of grassland and institutional lands, will be transformed to residential development on lands zoned for residential development. Greystones – Delgany is a target growth area in the Wicklow County Development Plan and other relevant plans.

The proposed development will involve some cut and fill to allow the placing of buildings on the steep lands. The soil cut out will be reused on site as far as practicable. Services such as drainage and attenuation will also be provided on the lands. The lands drain toward the Three Trout Stream, which is topographically lower than the application site and flows in an easterly direction.

There is no risk of impacts on any Natura 2000 sites or other designated sites as outlined in the stand-alone Screening for Appropriate Assessment report referred to above that accompanies this application.

Habitats within the proposed development site include fields, hedgerows and trees. Some of the trees and hedgerows within the proposed development will be removed during site clearance, and other will be transplanted within the site, as indicated in the landscape plans and arboricultural assessment submitted as part of this application. Most of the trees to be removed are Category C trees, i.e trees of low-quality trees. The loss of grassland and hedgerow habitat will partially be compensated by the planting of new trees, shrubs and amenity grasslands as part of the landscaping scheme. Some of the existing hedgerow will be retained and reinforced with native hedging and tree planting to encourage and develop wildlife circulation and habitat creation. On balance, this will result in a slight residual negative impact on the value of habitats on the site.

The demolition of the modern extension the Convent building will result in the loss of some bat roost habitats. In addition, some buildings are planned for refurbishment and reuse. These are the subject of a bat derogation license which is submitted with this application. Appropriate mitigation measures as agreed with the National Parks and Wildlife Service will be applied during the construction phase to avoid possible injury to bats. The loss of habitat will result negative significant impacts on the bat roost. Landscape proposals include the placing of bat boxes on the site. The subject of bat roosts is addressed in more details in the Ecological Impact Assessment Report submitted as part of this application.

Impacts on the amenity of existing dwellings to the south and east of the Carmelite Convent site will be limited to the construction phase. The heights and separation distances from the proposed development are designed to avoid any injury to their amenity by reason of overlooking, overshadowing or visual obtrusion. In addition, any possible impacts which may arise of the construction phase will be the subject of a detailed Construction Management Plan which will be agreed with the Planning Authority.

3. A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from—

(a) the expected residues and emissions and the production of waste, where relevant, and

The proposed development includes primarily residential development and a small element of community use. Accordingly, there is no significant expected residue and emissions. All buildings are designed to the highest energy efficiency standards and would include micro-renewables such as solar panels. It is therefore not anticipated that any significant residues or emissions will emanate from the residential development. In terms of the production of waste, an operational waste management plan accompanies the application which provides for residential waste storage, segregation and collection in accordance with the standards as set out in the Apartment Design Guidelines 2018 and by Wicklow County Council. The proposed creche, and community hall will generate operational waste to segregated standards which will be collected in line with Council policy. No significant effects are anticipated.

(b) the use of natural resources, in particular soil, land, water and biodiversity.

The site slopes in a south east direction with a variation in c.20m in levels. It is therefore expected that there will be some cut and fill required to accommodate some of the buildings proposed, particularly the apartment block which is located centrally to the site. The soil will also be excavated for the attenuation tank. It is proposed to reuse the soil as far as possible to achieve appropriate gradients for roads and services. The use of natural resources will not be significant. The Tree Retention Plan and the Landscape Masterplan indicate trees and hedgerows which are to be retained and those transplanted. These will form part of a

cohesive landscape ensemble which will retain its ecological value. The loss of grassland and hedgerow habitat will partially be compensated by the planting of new trees, shrubs, and amenity grasslands as part of the landscaping scheme. On balance, this will result in a slight residual negative impact on the value of habitats on the site.

All engineering infrastructure will be developed to prevent any discharge to soils (interceptors etc.). There are no significant effects considered likely on soil.

Pollution-prevention measures will be implemented during the construction of the proposed development which will ensure that no pollutants can reach watercourses. Adherence to best practice Construction and Environmental Management during the construction phase will ensure that development would not result in pollution of groundwater or surface water. Dust nuisance during construction could be controlled by a dust minimisation plan. A Construction Management Plan will accompany the application.

A bats survey for the site was also undertaken and concluded there was a roost in the modern extension to the convent, which is proposed for demolition. The full details are provided in the Ecological Impact Assessment which accompanies this pre-application.

The construction of the development will require use of materials and energy will be consumed once the building becomes operational. The development has been designed to meet the Part L 2019 Nearly Zero Energy Buildings Standards so the new structures will have minimal energy requirements. Having regard to the zoning of the site and the present use of the site, it is not considered that that significant environmental effects are likely due to the use of natural resources.

4. The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7.

Schedule 7 is considered below.

The ‘*Environmental Impact Assessment (EIA) Guidance for Consent Authorities Regarding Sub-Threshold Development*’, groups criteria for deciding whether or not a proposed development would be likely to have significant effects on the environment under three headings which correspond to (updated) Schedule 7.

Schedule 7 criteria for determining whether development listed in part 2 of schedule 5 should be subject to an environmental impact assessment.

- Characteristics of the proposed development.
- Location of the proposed development.
- Characteristics of potential impacts.

Accordingly, the proposed development is assessed under the following headings.

5.1.2 *Characteristics of proposed development*

The characteristics of proposed development, in particular—

(a) the size and design of the whole of the proposed development,

The proposed development consists of 232 no. residential units, a creche, change of use from church to a community facility, a management office, demolition works, new entrances, landscaping, parking and site development works.

The whole design of the units and associated infrastructure is considered not likely to cause significant effects on the environment.

(b) cumulation with other existing development and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment,

The site is bounded to the north west by a greenfield which is the subject of an extant planning permission for development (PA.Reg.Ref. 15/3107 and ABP.Ref. PL27.248401) The permitted development includes 89 dwelling units.

The proposed development to the north in addition to the subject application would result in a total of 324 units. This is below the EIA threshold of 500 units. A screening for appropriate assessment was submitted as part of the parent permission (PA.Reg.Ref. 15/3107) and concluded that the development would not have any impacts, direct or indirect on the qualifying interests of any designated Natura 2000 site within a 15km radius and that, as a result, a Stage 2 Natura Impact Statement was not required. The subject application is also accompanied by a screening for Appropriate Assessment which concludes that significant effects are not likely to arise either alone or in-combination with other plans or projects.

(c) the nature of any associated demolition works,

Demolition works consist of the demolition of 1,896 sqm. This consist in the main to the extension to the protected structure. A construction environmental and demolition management plan will accompany the application.

(d) the use of natural resources, in particular land, soil, water and biodiversity,

Please see section 5.1.1, section 3.

(e) the production of waste,

Please see section 5.1.1 section 3. An Operational Waste Management Plan for the residential development, creche and community centre accompanies the application.

(f) pollution and nuisances,

Noise, vibration, lighting and dust arising from construction activities and construction traffic have the potential for pollution or nuisance. There could be a risk of surface water pollution due to hard surfacing and use as car parking. The potential risks can be mitigated by adherence to best practice Construction and Environmental Management during the construction phase will ensure that development would not result in pollution of groundwater or surface water. Dust nuisance during construction could be controlled by a dust minimisation plan. During the operational phase attenuation tanks will store rainwater from hardstanding areas in order to buffer and control discharge to the drainage network which will also allow some grit and silt to settle out. A construction management plan is submitted as part of this application.

(g) the risk of major accidents, and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge, and

The proposed development will result in no particular risk of accidents arising from substances or technologies used. Traffic will be generated during the construction period, but for a temporary and defined period only, using Bellevue Hill Road and Convent Road The development will result in the traffic movements over and above the current levels. This will be mitigated through a construction management plan.

(h) the risks to human health (for example, due to water contamination or air pollution).

The nature of the proposed development and the engineering provisions will not lead to the likelihood of any risk to human health. The proposed development is of standard construction method and of appropriate scale and does not require the use of particular substances or use of technologies which of themselves are likely to give rise to significant environmental effects. The proposed development will provide significant public open space and connectivity through the masterplan to adjacent lands to the local population.

5.1.3 Location of 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,

The greenfield to the west and north east of the site have lain idle for some time, as was the plot of land to the north. Until recently, the convent was in use for residential accommodation by the Carmelites Sisters. The chapel was used for religious activities relating to the convent. The lands as a whole, including the convent, are zoned for residential development. The proposal to develop residential dwellings are clearly compatible with the approved zoning. In addition, the community uses proposed as part of the development are permissible under the current zoning and therefore also compatible.

(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 proposal is not of such a scale that it would impact upon the relative abundance, quality and regenerative capacity of natural resources in the area.

(c) the absorption capacity of the natural environment, paying particular attention to the following areas:

(i) wetlands, riparian areas, river mouths;

The proposal is not of such a scale that it would impact upon the absorption capacity of this aspect. An AA screening accompanying the application indicates a range of pollution-prevention measures will be implemented during the construction of the proposed development, which will ensure that no pollutants can reach watercourses. There is no risk of impacts on any Natura 2000 sites or other designated sites. The existing section of open stream which is located to the north of the site will be improved and made a feature of the landscape design encouraging biodiversity in this area. There are not buildings proposed at this location.

(ii) coastal zones and the marine environment;

The proposal is not of such a location or scale that it would impact upon the absorption capacity of this aspect.

(iii) mountain and forest areas;

The proposal is not of such a location or scale that it would impact upon the absorption capacity of this aspect.

(iv) nature reserves and parks;

The proposal is not of such a location or scale that it would impact upon the absorption capacity of this aspect.

(v) areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive and;

The AA screening accompanying the application indicates there is no risk of impacts on any Natura 2000 sites or other designated sites.

(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;

This does not apply.

(vii) densely populated areas;

This does not apply.

(viii) landscapes and sites of historical, cultural or archaeological significance.

There is one designation of a protected structure on this site. This is detailed in the conservation report and the Protected Structure and Gate lodge are retained. No other designations apply. The protected structure will be used as a community and cultural facility for the residents of Delgany and further. The modern extension will be removed. The detailed archaeological report accompanies the application indicates that no recorded monuments will be impacted upon by the proposed development however the site is considered to be in a rich archaeological landscape. Based on the results of this desk based assessment, archaeological mitigation in terms of both geophysical survey and test trenching is recommended.

5.1.4 *Types and characteristics of potential impacts*

The likely significant effects on the environment of proposed development in relation to criteria set out under paragraphs 1 and 2, with regard to the impact of the project on the factors specified in paragraph (b)(i)(I) to (V) of the definition of 'environmental impact assessment report' in section 171A of the Act, taking into account—

(a) the magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected),

The magnitude of the proposal is significant only in that it transforms open land to a built form. However, it will consolidate the village on residentially zoned land. It will also provide for a more cohesive built fabric as there is an extent planning permission to the north east of the site. The extent of the impact will be confined to that area in the immediate environs of the subject site and will be limited to the local population.

The provision of community facilities will be positive and long lasting as there are currently no community facilities of the kind in Delgany.

(b) the nature of the impact,

The impact will be an increase in the residential population on residentially zoned land. The impact will also provide housing in a time of severe shortage and in accordance with the Development Plan core strategy.

(c) the transboundary nature of the impact,

This does not apply.

(d) the intensity and complexity of the impact,

The proposal in itself is not of a complex nature such that it warrants EIAR.

(e) the probability of the impact,

Should permission be granted, the development will proceed.

(f) the expected onset, duration, frequency and reversibility of the impact,

The principle impacts associated with the proposal will most likely be concentrated during the construction phase of the development estimated for completion by 2025. The proposed built environment will be permanent and will likely adapt over time but there is little likelihood it there will be a reversal.

(h) 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

This is fully addressed in section 5.1.2 (b) above.

(g) the possibility of effectively reducing the impact.

The proposed development would proceed with a number of inherent safety measures such as attenuation tanks and petrol and grit interceptors to address the potential for surface water run-off associated with the car parking to be provided in tandem with the built structures. On the issue of the built structures, it is considered that the proposal would visually change the existing landscape, however, the design put forward is a contemporary approach which is a high standard architectural design with retention of hedgerows, retention of trees and provision of well-designed open space, connections and extensive landscaping. The proposal to reuse a protected structure for community use also constitutes a positive effect, as it would remain otherwise vacant, contributing to its aesthetic and structural demise. On the issue of impact in terms of wastewater treatment, it is considered that the impact upon the exiting sewage plant is satisfactory having regard to the engineering reports accompanying the application.

6 Framework of further assessment - ABP guidance

The Guidance note for prospective applicants suggests a framework as a description of possible effects on the environment, highlighting any aspect of the development likely to have (i) significant effects on the environment and (ii) significant effects on a European site” as set out in question 6 of the pre application request form. This is based on Schedule 6 ‘*Information to be contained in an EIS*’. While the screening

above considers the possible effects on the environment, and there is an overlap with the guidance from the Board, for completeness the possible effects are summarised below per the suggested framework. The Guidance requires the statements in response to Question 6 should be brief, precise and development specific.

Description of possible effects on the environment

- **'Population and Human Health'**

There may be short term nuisance to the local population during the construction works due to construction traffic movements, noise and dust. These are not likely to be of a significant and will be temporary in nature. Best practice will mitigate against noise and dust nuisance. A mixed of residential units including social housing will provide additional residential accommodation in an area identified as a growth area on residentially zoned land with landscaped open space. In addition, the proposed development includes community facilities for the use of the prospective residents and the local population, reducing their need to travel elsewhere to meet their community needs. These would result in positive effect.

- **'Biodiversity'**

The ecological features relevant to the proposed development site are the grassland, the hedgerows, and trees, plus birds and bats. Full details of the possible effects on biodiversity are provided in the Ecological Impact Assessment. The landscape proposals have devised with a view to compensate losses which may arise from the development of residential units on undeveloped agricultural fields. It includes, in particular, the provision of complementary trees and hedge planting to reinforce existing vegetation on the site, in addition to bat and bird boxes. The report notes that the conversion of a greenfield site to an urban setting will result in a loss of biodiversity. The report also notes the *"landscape architects design proposals include significant tree planting and the planting of native hedgerow and pollinator friendly planting within the development in addition to enhancements along the watercourse within the site"*. The small stream that flows through the site will be retained in an open state and will be widened in parts to increase the area of riparian habitat, planted with native species and provide a corridor for wildlife. It is proposed to create a wetland attenuation area at the end of this small watercourse as part of SUDS measures for the site and this will be further enhanced for wildlife through suitable planting.

A derogation licence is included in the Bat Report that relates to the removal of the modern extension to the Church.

The summary of that report concludes,

'mitigation measures be reflected in the Construction Management Plan/Method Statements prepared for the site and for an ecologist to be engaged to review same prior to the commencement of the development.'

- **'Land'**

The subject lands are a mix of greenfield and built structures. The land will be built upon. Owing to connections to public foul, storm and water services and having regard to the soils/geology of the site, it is not considered that there will be significant effects on the environment.

- **‘Soil, water, air, climate and the landscape’**

Soil

The nature of the primarily residential development on soils are not considered to have significant effects on the environment.

Water

The impact on the watercourses are indirect and hypothetical during the construction of the proposed development. In accordance with best practice, appropriate mitigation measures will be employed during construction.

During the operation of the proposed development, rainwater will either percolate to ground in green areas or will be collected in gutters / drains and channelled through oil / silt interceptors into attenuation tanks, from which it will be discharged via the drainage infrastructure. Surface water runoff from the site will be attenuated to the greenfield runoff rate as recommended in the Greater Dublin Strategic Drainage Study (GDSDS).

Air

During construction there is potential for localised pollution from dust, but as proper construction management will be employed, it is not considered such have significant effects on the environment.

Climate

The nature of the proposed development is not considered such have significant climatic effects on the environment.

Landscape

There are no specific landscaping designations applicable to the residential zoned site. The proposed development is consistent with the emerging landscape in areas zoned for development. It is not considered that the proposed development such have significant effects on the landscape environment.

- **‘Material assets, including the architectural and archaeological heritage, and the cultural heritage’**

Land is considered a material asset. The land has been zoned for residential use. The site has a protected structure at the eastern side. The Conservation Report states as follows,

‘Heritage Impact Assessment:

The proposed development includes the retention of the primary protected structures on the site, those being the mid-19th century two storey house and Gothic Revival chapel. The demolition of the secondary structures in the stableyard and grotto are deemed to be acceptable because of the extensive provision of much needed residential housing.’

The report summarises,

‘MESH Architects have carefully considered the potential impacts to the protected structures’ significant features and its original design and details. We believe that the proposed developments strike an appropriate balance between the careful repair and retention of the property’s significant buildings, and the retention of a significant portion of their historic setting.’

In addition, the proposed reuse the protected structure towards community uses such as a community hall and a creche contribute to maintaining the integration of the structures in the community. Their refurbishment and reuse as community facility is a use which is generally considered acceptable in the Architectural Heritage Protection Guidelines 2011.

A detailed archaeological report accompanies the application. No recorded monuments will be impacted upon by the proposed development however the site is considered to be in a rich archaeological landscape. Based on the results of this desk based assessment, archaeological mitigation in terms of both geophysical survey and test trenching is recommended.

- **‘The expected effects deriving from the vulnerability of the project to risks of major accidents and/or disasters.’**

There is no particular risk of accidents arising from substances or technologies used. Traffic will be generated during the construction period, but for a temporary and defined period only – using the existing accesses on Bellevue Hill Road and Convent Road. The development will result in the traffic movements over and above the current levels. However, this will be mitigated by a construction management plan.

- **‘The inter-relationship between the above factors’**

The above factors indicate impacts which are not considered significant and nor cumulatively would result in significant effects.

7 Conclusion

This screening report has been prepared to accompany a pre-application for Strategic Housing Development application. In summary-

- The proposed development is considerably below the threshold of a mandatory EIA which would require an Environmental Impact Assessment Report (EIAR).
- The description of possible effects on the environment are not considered significant.
- An Ecological Impact Assessment and an AA screening Assessment do not consider that there would be significant effects on the Environment subject to proper construction methods and management.

