

# EIA SCREENING STATEMENT

*In respect of*

**Proposed Strategic Housing Development at  
Southgate, Dublin Road, Drogheda, Co Meath**

*Prepared by*

**John Spain Associates**

*On behalf of*

**Rockmill Ltd**

**August 2021**



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## 1.0 INTRODUCTION

- 1.1 On behalf of the applicant, Rockmill Ltd., we hereby submit this Environmental Impact Assessment Screening Statement to assess the potential impacts on the environment of the proposed SHD residential development located on lands north of the existing Southgate Centre, Dublin Road, Drogheda, Co Meath.
- 1.2 The purpose of this statement is to provide An Bord Pleanála with the information required under Schedule 7A of the Planning and Development Regulations 2001, as amended,. This will enable the Board to determine in light of the criteria set out under Schedule 7 of these regulations whether the proposed development is likely to have significant effects on the environment, and the application can be determined without an Environmental Impact Assessment Report (EIAR) submitted with the application. This information is provided to assist the Board in the event that it finds that there is a significant and realistic doubt in regard to the likelihood of significant effects on the environment arising from the proposed development, following a preliminary examination, as required under Regulation 299B of the Planning and Development Regulations.
- 1.3 The development will consist of a residential development on the lands at located to the northeast of the Dublin Road, to the north of the existing Southgate Centre, and to the southwest of the existing Grange Rath residential development, in Drogheda, Co. Meath.
- 1.4 The proposed development comprises 201 no. residential units on a site of c. 1.74 hectares. The 201 no. residential units proposed are located within 5 no. proposed apartment buildings. The proposed units comprise 53 no. 1 bedroom apartments, 132 no. 2 bedroom apartments, and 16 no. 3 bedroom apartments.
- 1.5 The development includes associated site and infrastructural works including all associated road infrastructure, cycle and pedestrian facilities, foul and surface / storm water drainage, surface water management features, 181 no. car parking spaces, public open space, bin and bike stores, landscaping and boundary treatments, 1 no. ESB substation, and all ancillary works.

## 2.0 EIA SCREENING METHODOLOGY

### Legislation & Guidance

- 2.1 This Environmental Impact Assessment (EIA) Screening exercise has been carried out in accordance with the following legislation and guidance documents:
  - Planning and Development Act 2000 (as amended);
  - Environmental Impact Assessment Screening, OPR Practice Note PN02 (Office of the Planning Regulator, 2021)
  - European Union (Planning & Development) (Environmental Impact Assessment) Regulations 2018;
  - Planning and Development Regulations 2001 (as amended);
  - Planning and Development (Housing) and Residential Tenancies Act 2016;
  - Directive 2011/92/EU as amended by Directive 2014/52/EU;
  - Environmental Impact Assessment of Projects – Guidance on Screening (EU Commission, 2017)
  - Transposition of 2014 EIA Directive (2014/52/EU) in the Land Use Planning and EPA Licensing Systems – Key Issues Consultation Paper (2017:DoHPCLG)

- Guidelines on the information to be contained in Environmental Impact Assessment Reports (draft) (EPA 2017);
- Environmental Impact Assessment – Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018; DoECLG);
- Preparation of guidance documents for the implementation of EIA directive (Directive 2011/92/EU as amended by 2014/52/EU) – Annex I to the Final Report (COWI, Milieu; April 2017);
- Advice Notes for preparing an Environmental Impact Statement (draft) (EPA 2015); and
- Guidance for Consent Authorities regarding Sub-threshold Development (2003; DoEHLG).

2.2 Using the above documentation, it has been possible to carry out a desktop EIA Screening using the best available guidance while operating within the applicable legislation. It is noted that Directive 2014/52/EU has been transposed into Irish Legislation through the Planning & Development (Amended) Act and Planning and Development Regulations 2001, as amended. The methodology employed in this screening exercise is in accordance with the EIA Guidelines published in August 2018 by the DoHPLG and the contents of Schedule 7 and 7A of the Planning and Development Regulations 2001, as amended. The key steps to screen for an EIA is also set out in Section 3.2 of the Draft EPA “*Guidelines on the Information to be contained in Environmental Impact Assessment Reports*” (August 2017).

These steps are:

1. Is the development a type that that requires EIA?
2. Is it of a type that requires mandatory EIA?
3. Is it above the specified threshold?
4. Is it a type of project that could lead to effects? and/or
5. Is it a sensitive location? and/or
6. Could the effects be significant?

2.3 Mitigation measures for the proposed development during the construction and operational phases are set out in various reports accompanying the application including, the Construction and Environmental Management Plan by DBFL Consulting Engineers, the Construction Waste Management Plan by Byrne Environmental Consulting Ltd, the Operational Waste Management Plan by Byrne Environmental Consulting Ltd, the Ecological Impact Assessment Report by Enviroguide, the Bat Assessment Report by Wildlife Surveys, the Arboricultural Report by Charles McCorkell Arboricultural Consultancy, and the Landscape and Visual Impact Assessment prepared by Dermot Foley Landscape Architects.

2.4 For the avoidance of doubt, the mitigation measures within these accompanying reports, which are referred to in this Statement, should be considered as mitigation for the purposes of the Competent Authority’s EIA screening determination. When undertaking the EIA Screening Assessment in respect of the current application, and the written determination for same, it would be appropriate for the Board to refer to these mitigation measures which are referenced in this Screening Statement.

2.5 In the event that the screening determination carried out by the Board reaches the conclusion that the proposed development is not likely to have significant effects on the environment, the Board’s attention is specifically drawn to the requirement that the Board’s screening determination must comply with the requirements of Article 299C(2) of the Planning and Development Regulations, as amended, which provides:

“(2) (a) Paragraph (b) applies where the screening determination is that the proposed development would not be likely to have significant effects on the environment and the applicant has provided, under article 299B(1)(c), a description of the features, if any, of the proposed development and the measures, if any, envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment of the development.

(b) The Board shall specify such features, if any, and such measures<sup>1</sup>, if any, in the screening determination.”

2.6 This EIA Screening Statement and the proposed development has been informed by accompanying application documents including the following:

- Construction and Environmental Management Plan prepared by DBFL Consulting Engineers;
- Construction and Demolition Waste and By-product Management Plan, and Operational Waste Management Plan prepared by Byrne Environmental Consulting Ltd;
- Infrastructure Design Report & Drawings prepared by DBFL Consulting Engineers;
- Site Specific Flood Risk Assessment by DBFL Consulting Engineers;
- Transport and Transport Assessment prepared by DBFL Consulting Engineers;
- Appropriate Assessment (AA) Screening, and Ecological Impact Assessment (EclA) (by Enviroguide);
- Bat Assessment by Wildlife Surveys;
- Arboricultural Report by Charles McCorkell Arboricultural Consultancy;
- Landscape and Visual Impact Assessment, and Landscape Design Rationale by Dermot Foley Landscape Architects;
- Daylight and Sunlight Analysis by Avison Young.

2.7 The various reports address a variety of environmental issues and assess the impact of the proposed development and demonstrate that subject to the various construction and design related mitigation measures recommended that the proposed development will not have a significant impact on the environment. This EIA Screening Statement should therefore be read together with these other relevant reports.

### **EIA Screening Study Team and Guarantee of Competency and Independence**

2.8 This *Environment Impact Assessment Screening Statement* was completed by John Spain Associates (JSA) with the assistance of a project team led by JSA. The project team are:

<b>Topic</b>	<b>Consultancy</b>
Population and Human Health	JSA and others
Biodiversity	Enviroguide Charles McCorkell Arboricultural Consultancy Dermot Foley Landscape Architects
Lands and soils	DBFL Consulting Engineers
Water	DBFL Consulting Engineers Enviroguide
Air and Climate, Microclimate	DBFL Consulting Engineers KMD Architects

<sup>1</sup> Commonly referred to as mitigation measures.

Landscape	Charles McCorkell Arboricultural Consultancy Dermot Foley Landscape Architects KMD Architects
Material Assets	DBFL Consulting Engineers JSA
Archaeology, Architecture and Cultural Heritage	Archer Heritage
Vulnerability of the Project	DBFL Consulting Engineers Enviroguide
Interactions	JSA

- 2.9 This EIA Screening Statement has been prepared by Kate Kerrigan, BA(Hons) MSc, MRTPI, Associate Director with John Spain Associates, and approved by John Spain, Managing Director. Kate has over 10 years of experience in the co-authoring and coordination of EIS's / EIARs and EIA Screening Statements. John Spain (BBS, MRUP, MSCS, MRTPI, MIPI) has 30 years' experience of planning and development consultancy in Ireland and the UK.
- 2.10 Both are experienced in the preparation of screening reports and EIARs in the context of large scale SID and SHD projects.
- 2.11 The EIA Screening Report has also been peer reviewed and contributed to by AWN Consulting Limited, including Teri Hayes BSc (Geology), MSc (Hydrogeology), and Jonathan Gauntlett BSocSc (Environmental Planning), BBA (Economics). Teri is a member and former president of the International Association of Hydrogeologists (Irish Group) and a professional Member of the Institute of Geologists. Teri is a director with AWN Consulting with 25 years of experience in water resource management and environmental assessment and remediation. Teri has contributed to numerous environmental impact assessments and design of appropriate mitigation measures, acted as an expert witness at public hearings, lectured in EIA and providing expert advice on EIA sections for planning authorities. Jonathan is an Environmental Consultant in AWN Consulting with ongoing roles in impact assessment, licensing, environmental compliance and project management. Jonathan has over 9 years' experience in environmental compliance, environmental licensing, and urban planning. With experience working in the environmental consultancy, planning, and regulatory fields from Ireland, the UK and New Zealand.

### EIA Thresholds

- 2.12 An EIAR is required to accompany an application for permission for strategic housing development of a class set out in Schedule 5 of the Planning and Development Regulations 2001 (as amended) which equals or exceeds, as the case may be, a limit, quantity or threshold set for that class of development. As seen above, the relevant thresholds have not been exceeded in the present case.
- 2.13 Schedule 5 of the Planning and Development Regulations 2001 (as amended) sets out the thresholds for which if a project exceeds, must be subject to an Environmental Impact Assessment. Each element of the proposed development has been examined and against Schedule 5 to identify the class or classes of development that may apply to the project.
- 2.14 Part 2 of Schedule 5 lists the following that may be relevant to the proposal:

*10. Infrastructure projects –*

*(b) (i) Construction of more than 500 dwelling units;*

- (iv) **Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere;**

*(In this paragraph, 'business district' means a district within a city or town in which the predominant land use is retail or commercial use).'*

13. *Changes, extensions, development and testing –*

*(a) Any change or extension of development already authorised, executed or in the process of being executed (not being a change or extension referred to in Part 1) which would:-*

*(i) result in the development being of a class listed in Part 1 or paragraphs 1 to 12 of Part 2 of this Schedule, and*

*(ii) result in an increase in size greater than –*

*- 25 per cent, or*

*- an amount equal to 50 per cent of the appropriate threshold,*

*whichever is the greater<sup>2</sup>*

*15. Any project listed in this Part which does not exceed a quantity, area or other limit specified in this Part in respect of the relevant class of development but which would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.'*

- 2.15 The proposal relates to the provision of 201 no. residential units. The proposed development does not equal or exceed Class 10(b)(i) therefore an EIA is not a mandatory requirement relative to unit numbers.
- 2.16 The application site area is circa 1.74 hectares, and therefore does not equal or exceed Class 10(b)(iv), whereas the development is within a '*business district*', therefore an EIA is not a mandatory requirement as it is project below the threshold of 2 ha.
- 2.17 While within the same ownership of the adjoining site of the Southgate Centre, the proposed development is not a change or extension or further development or testing to the shopping centre and associated commercial development. It is a separate residential development, with its own access, car parking facilities and open space. As the proposed development does not represent a change or extension to existing development, Class 13 does not apply.
- 2.18 The proposed development, therefore, does not equal or exceed the relevant thresholds for a mandatory EIA. Having arrived at that conclusion, this screening report considers whether Schedule 5, Part 2, Class 15 of the Regulations applies to the proposed development. Under Class 15, if a proposed development is likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7, then an EIA would be required.

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<sup>2</sup> Emphasis added.

- 2.19 The application is accompanied by the series of reports as set out in Paragraph 2.5. These reports consider the perceived environmental impact of the proposed 201 no. unit development.
- 2.20 Schedule 5, Part 2, Class 15, above, relates to projects likely to have significant effects on the environment having regard to Schedule 7. The following section and basis of this screening is to screen for the requirement of EIAR on a sub-threshold project as the proposal does not exceed any other threshold in Schedule 5.

### **Sub Threshold Projects Requiring an Environmental Impact Assessment Report**

- 2.21 An EIAR will be required to accompany an application in respect of sub-threshold strategic housing development where the Board considers that the proposed development would be likely to have significant effects on the environment<sup>3</sup>.
- 2.22 Sub-threshold development means '*development of a type set out in Part 2 of Schedule 5 [in the Planning and Development Regulations, 2001 (as amended)] which does not equal or exceed, as the case may be, a quantity, area or other limit specified in that Schedule in respect of the relevant class of development*'.
- 2.23 We would respectfully draw the Board's attention to Regulation 299B of the Planning and Development Regulations which requires the Board to first carry out a preliminary examination of, at the least, the nature, size or location of the development and, based on that, and then consider whether or not that there is a real likelihood of significant effects on the environment arising from the proposed development.
- 2.24 In the event that the Board does determine, following the preliminary examination, that there is significant and realistic doubt in regard to the likelihood of significant effects on the environment arising from the proposed development, this screening statement includes the information specified in Schedule 7A to the Regulations
- 2.25 Schedule 7A of the Planning and Development Regulations 2001 (as amended) requires the information to be provided by the applicant or developer for the purposes of screening sub-threshold development for EIA, as set out below;
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*
    - (b) *a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.*
  2. *A description of the aspects of the environment likely to be significantly affected by the proposed development.*
  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*

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<sup>3</sup> See S172 (1)(b) of the Planning and Development Act, 2000, as amended.

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

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

2.26 Schedule 7A (4) refers to Schedule 7 which provides a list of criteria for determining whether development listed in Part 2 of Schedule 5 should be subject to EIA.

2.27 The criteria under Schedule 7 are grouped under three broad headings:

- Characteristics of proposed development;
- Location of proposed development; and
- Types and characteristics of potential impacts.

2.28 Section 3 below provides the information required by Schedule 7A for the purposes of screening sub-threshold development for EIA and takes into account, where relevant, the criteria outlined in Schedule 7.

2.29 The information to be provided by the applicant or developer for the purposes of screening sub-threshold development for environmental impact assessment is set out under Schedule 7A of the *Planning and Development Regulations 2001*, as amended (in particular by the 2018 *European Union (Planning and Development) (Environment Impact Assessment) Regulations for present purposes*). Paragraph 4 of Schedule 7A requires that: *'The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7.'*

2.30 As required by Regulation 299B(1)(b)(ii)(II)(C), the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive have been taken into account. An appropriate assessment screening report is also submitted with this application and satisfies the obligations under the Habitats and Birds Directives. The application also complies with the obligations under the 2000 Water Framework Directive

2.31 In that regard we would refer to the recent High Court judgment in *Waltham Abbey Residents Association v An Bord Pleanála* [2021] IEHC 312 where Humphreys J. set out the requirements for meeting the objective of Reg.299B(1)(b)(ii)(II)(C) which requires the application to include a "statement indicating how the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive have been taken into account." In this regard, a separate statement has been prepared by AWN Consulting Limited, and is included as part of this application.

2.32 We would respectfully request that the Board decision sets out findings on the preliminary examination on whether there is significant and realistic doubt in regard to the likelihood of significant effects on the environment arising from the proposed development. Having done so, the decision should record the Board's finding, having regard to the information provided on the information in Schedule 7A and any further relevant information on the characteristics of the proposed development and its likely significant effects on the environment.

2.33 The decision should then specifically refer to Regulation 299B(1)(b)(ii)(II)(C) and the information provided on the available results of other relevant assessments of the

effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive which have been taken into account in this statement.

- 2.34 We would also respectfully suggest that the Board identifies in its EIA screening the different criteria in Annex III to the EIA Directive under the various headings and sub-headings and would refer to the judgment in *Eco Advocacy CLG v An Bord Pleanála* [2021] IEHC 265.

### **3.0 EIA SCREENING STATEMENT**

- 3.1 The following sections provide the information as required by Schedule 7A for the purposes of screening sub-threshold development for EIA.

#### **(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

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

#### **Physical Characteristics of the Proposed Development**

- 3.2 A detailed description of the physical aspects / characteristics of the proposed development is provided within the Statement of Consistency prepared by John Spain Associates. The Design Statement prepared by KMD Architects details the architectural rationale and characteristics of the proposals, while the Landscape Design Rationale prepared by DFLA describes the landscape design, which forms an integral part of the overall design.
- 3.3 The other reports prepared by the specialist consultants and design team members as outlined within Section 2 of this Statement also describe particular aspects of the scheme in further detail. This documentation should be read along with this Statement, this section of the EIA Screening Statement sets out a brief description of the development for the purposes of screening for EIA.
- 3.4 The proposed development comprises 201 no. residential units on a site of c. 1.74 hectares located to the northwest of the Dublin Road, to the north of the existing Southgate Centre, and to the southwest of the existing Grange Rath residential development, in Drogheda, Co. Meath. Southgate is located 270 m southeast of the Louth / Meath County border, approximately 2.9 km southeast of Drogheda Town Centre.
- 3.5 The proposed development will comprise of 201 no. residential units in 5 no. blocks of 5 storeys in height over a basement located under Blocks 1 and 2. The basement provides for 169 no. car parking spaces, 8 no. Motor bike spaces and 236 no. bicycle parking spaces. At grade, there are 12 no. car parking spaces and 64 no. bicycle parking spaces. The gross floor area is 19,125 sqm. The site coverage is 23%, plot ratio is 1:10 and density is circa 115 units per hectare. This is not a large-scale project or overly dense in an urban context.
- 3.6 The site in question is currently undeveloped and the proposed development is compatible with its surrounding land uses and compliance with the site's zoning

Objective C1 within the Meath County Development Plan 2013-2019, which seeks to “provide for and facilitate mixed residential and business uses”. The lands remain zoned C1 under the Draft County Development Plan, as amended by the material alterations recently published.

- 3.7 In zoning the land for mixed residential and business use under the Meath County Development Plan 2013-2019, the Planning Authority have assessed the nature of the site to ascertain its capacity to accommodate residential development and merit a zoning as designated. A Strategic Environmental Assessment (SEA) and Natura Impact Report was carried out in relation to the Development Plan.
- 3.8 The proposed layout has also been designed to ensure it can support and integrate with future development of the Southgate Centre. The planning report and statement of consistency demonstrates how the overall development of the applicants landholding / site at Southgate will meet the objectives and guidance associated with the C1 zoning objective, while also allowing a Strategic Housing Development (delivering much needed housing for the town of Drogheda, which is designated for growth) to proceed, and ensuring that an appropriate use mix is provided in the area to meet the C1 zoning objective requirements.
- 3.9 Water supply and wastewater will be provided via the public mains network. Water supply will be via a new 150 mm watermain connected to the existing 200 mm diameter public watermain at the entrance to the proposed development. The foul drainage flows will discharge gravity to the existing 300 mm diameter foul sewer. The disposal of foul water from the site is separated from that of surface water and the required connection point has been approved by Irish Water and MCC.
- 3.10 Upgrade works are required to the existing watermain. Irish Water have confirmed that these works are feasible. No works are required for the foul sewer. Wastewater will be sent to the municipal treatment plant at Drogheda, which is operated by Irish Water under licence from the EPA. The Drogheda wastewater treatment plant is in compliance with prescribed treatment standards and ample capacity exists to accept the likely additional loading from this development.
- 3.11 Surface water is within the catchment of the Stagrennan Stream, which discharges to the Boyne Estuary. This is within the tidal range of the River Boyne. Surface water runoff from the proposed residential development would be attenuated to Qbar in accordance with the recommendations of the GDSDS, with surface water runoff exceeding this rate stored for up to a 1% AEP (Annual Exceedance Probability) rainfall event. Surface water storage would be provided in an underground storage system, such as ‘Stormbloc’ or similar approved system for storm events up to 1 in 100-year return period
- 3.12 There is one surface water outfall point identified for receiving attenuated surface water runoff from the subject site. Surface water will be discharged via 225mm diameter pipe to an existing 375mm diameter pipe located northwest of the subject site. This existing 375mm diameter pipe runs northwest through Grange Rath housing estate before outfalling to the Stameen Stream approximate 1km north of the subject site.
- 3.13 The subject site will be treated as a single catchment for the purposes of dealing with surface water and the development will provide for storage up to a 1 in 100 year storm event.

### ***Demolition and Excavation***

- 3.14 There are no demolition works associated with the proposed development. The volume of excavation is of the order of 25,000 cubic metres for the purposes of building a basement. Where excess soils may not be re-used within the proposed development, the Contractor will export the soils for authorised recovery, recycling or disposal. It has been estimated that circa 3,900 tonnes of excavated soil and stones will be exported from the site.

### ***Use of natural resources***

- 3.15 An estimation of the soil to be removed from the site has been calculated in the Construction and Demolition Waste and By-Product Management Plan prepared by Byrne Environmental Consulting Ltd. 3,900 tonnes of Stones and Soil will be removed from the site. Excavated soils may be suitable for re-use in other construction sites and may be declared as a by-product; if it is deemed to be a waste it will be exported to a licenced disposal site.
- 3.16 The proposed development once operational have a demand for potable water for residences and associated facilities. The proposed development will have an average daily demand of 0.94l/s (litres per second), with a peak flow is approximately 5.89 l/s.
- 3.17 The subject site itself is an infill site, which has been subject to previous ground works and is cleared of vegetation. The Ecological Impact Assessment report states at section 4.1.1.2 *'At present there are no natural habitats remaining at the site of the proposed development. The site was cleared of natural habitats and completely covered in gravel hardcore during the Grange Rath Development over 10 years ago.'*

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

- 3.18 The risk of pollution and nuisance (dust noise, traffic) has been considered in Construction and Environmental Management Plan (CEMP), and the AA Screening Report. There are potential short-term nuisances associated with construction that will require adherence to the CEMP to manage nuisances arising during construction.
- 3.19 The AA Screening report sets out that the subject site does not support springs or flowing watercourses nor were any drainage ditches observed beneath the boundary treelines/hedgerows. It notes, the Stagrennan stream (EPA code: 07S32) is located 0.295km northwest of the project site and is mapped by the EPA as flowing in a north-easterly direction. This watercourse then flows into the Boyne River, which flows into Boyne Coast and Estuary SAC and Boyne Estuary SPA approx. 3.1km downstream. As such there is no pathway linkage for impact on water receptors.
- 3.20 For further detail on the physical characteristics of the proposed development please refer to the architectural drawings, design statement and the landscape drawings which accompany this planning application. Figure 3.1 notes the proposed layout of the scheme. Please see the Proposed Site Layout Plan for details.



**Figure 3.2 Proposed Site Layout Plan**

### **Location of Proposed Development**

- 3.21 The subject site is strategically located along the Dublin-Belfast Corridor, southeast of Drogheda Town Centre, adjacent to the Dublin Road, and within a 30-minute drive of Dublin Airport. MacBride railway station is located approximately 2 km north of the subject site. The site is located to the northern side of the Dublin Road, with the large Grange Rath housing development to the north and east of the site, with the Grange Preschool and Early Years Centre immediately bordering the site to the north. The South/Southeast of the site is bounded by the Southgate Shopping Centre, which is a mixed use development with a significant commercial retail area.
- 3.22 The site in question is currently undeveloped with an area of c. 1.74 hectares, with no apparent existing structures, surrounded by paladin fencing and with only a slight gradient. The site has previously been subject to clearance (unrelated to the current development). Little vegetation exists on the site at present.
- 3.23 The proposal for the site includes a high degree of interconnectivity with the existing Southgate and Grange Rath developments adjacent. The large Grange Rath housing development bounds the proposal site to the east and consists of a large-scale residential development of primarily detached and semi-detached single housing units, apartment blocks with facilities included such as public open space, outdoors sports pitches and childcare facilities.
- 3.24 The Southgate Centre is a high-quality mixed-use employment and retail centre located to the south of the proposal site. Facilities within Southgate include office space, residential units, cafes, restaurants, a large anchor supermarket, clothing stores, specialist food stores, barbers, accountants and healthcare facilities. The office space within the scheme accommodates major tenants such as Coca-Cola and the National Driving Licence Service, as well as apartments situated in two blocks along the eastern face of the development.

- 3.25 A large existing childcare facility is located to the north of the subject site, and is accessed from Park Heights, adjacent to the subject site. This facility comprises a main building along with a large outdoor play area.
- 3.26 There are a number of existing schools in the area surrounding the subject site, including Gaelscoil an Bhradain Feasa, Le Cheile Educate Together National School, and Drogheda Grammar School, amongst others. There is a recent permission for a temporary secondary school at Mill Road, roughly 1.5km from the subject site. That temporary school will be replaced with a permanent school located along the Mill Road in due course.
- 3.27 The proposed development is located at an accessible location within the southern environs of Drogheda, directly adjacent to a bus stop which benefits from c. 20 minute services (101 and 101X) between Drogheda town centre and Dublin City Centre. Colpe Road, to the southeast is also served by bus routes 910 and 912, with half hour frequencies to UCD Belfield and Cathal Brugha Street in Dublin City Centre. The bus stop for these routes on Colpe Road is c. 5 minutes, or 600 metres away from the subject site. The subject site is c. 5 minutes by bike from Drogheda Train Station and c. 10 minutes by bike from the town centre of Drogheda (Shop Street).
- 3.28 The Dublin Road adjacent to the subject site accommodates pedestrian and cycle facilities, while the development proposes new pedestrian and cycle infrastructure which will tie in with existing infrastructure in the surrounding area.



**Figure 3.3: Aerial view of the subject site in context**

### ***Biodiversity***

- 3.29 An Ecological Impact Assessment (EclA) and a Bat Assessment Report have been prepared to accompany this application. The Ecological Impact Assessment states at section 4.1.1.2 in relation to the habitat survey: *"In general, the site hedgerows and treelines offer potential shelter and nesting habitat for bird life however the lack of any*

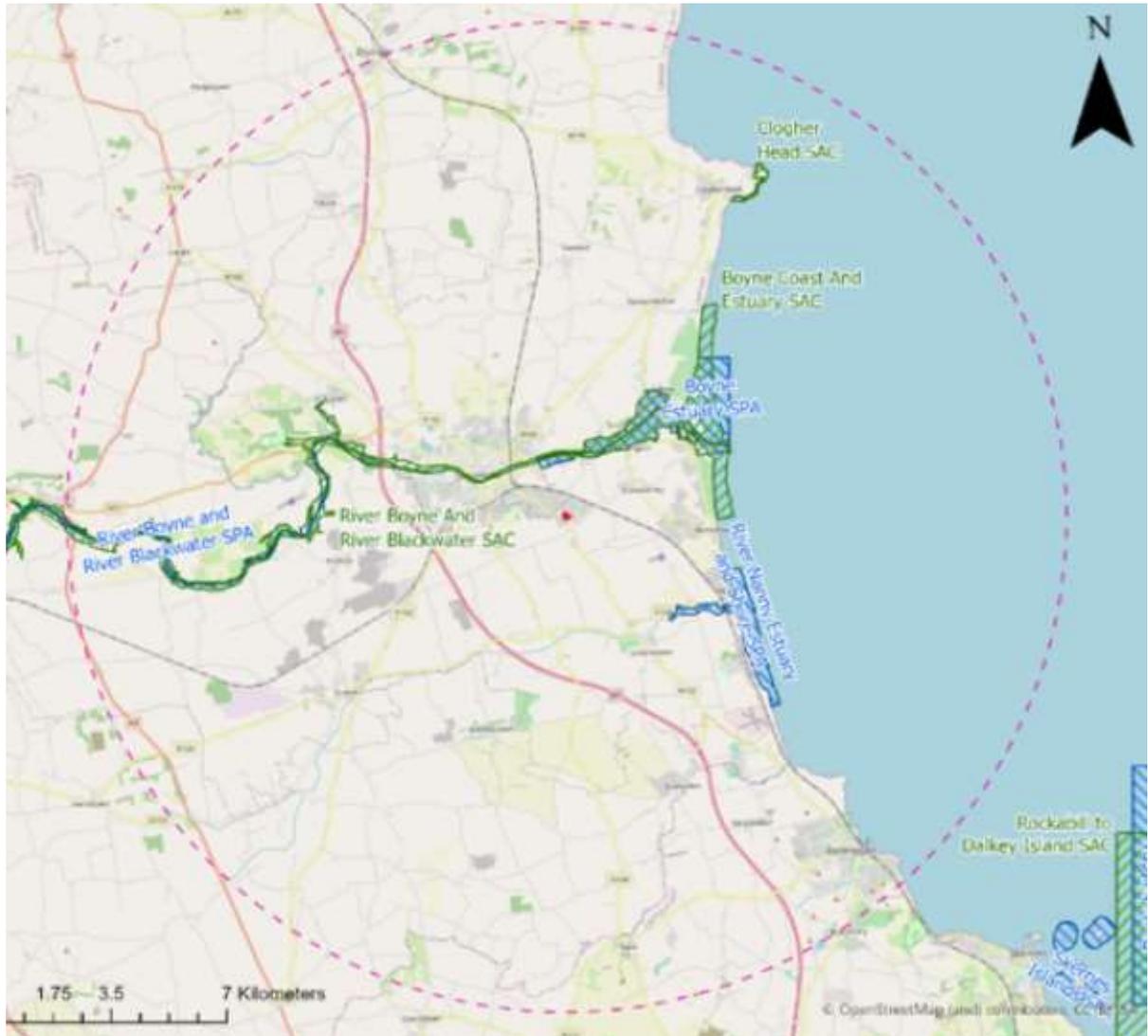
*natural ground vegetation or exposed soil leaves the site unsuitable for ground foraging birds."*

- 3.30 A walkover bird survey was completed at the site, and we refer to the EclA for further details. In summary, as the site is relatively compact and largely an open space with low ground cover over the majority, the use of transect or quadrat surveying were not required.
- 3.31 In relation to bats, the site was surveyed for bat activity and roost potential in June 2020 by qualified Bat Ecologists Brian Keeley and Donna Mullen. The complete Bat Survey is attached in Appendix V to the EclA. No bat roosts were found in the trees on the boundary of the site however Bat foraging activity was noted during the survey.
- 3.32 As noted in the AA Screening Report, Figure 3.4 shows there are several Natura 2000 sites within a c.15 km radius: the closest to the site being the River Boyne and River Blackwater SAC, the Boyne Coast and Estuary SAC and the Boyne Estuary SPA. These areas can be found approximately 1.6km to 1.9km from the site. The AA Screening Report sets out there is no direct pathway to the Natura 2000 sites, stating:

*"The Stagrennan Stream (EPA code: 07S32) is located 0.3km north of the project site and is mapped by the EPA as flowing in an easterly direction. This watercourse then flows into the Boyne Estuary and the Boyne Coast and Estuary cSAC and the Boyne Estuary SPA approx. 3km downstream.*

*There is no hydrological connection between the Site of the Proposed Development and the Stagrennan stream or the Boyne Estuary. There are also no drainage ditches at the site of the Proposed Development and there is no following water course linking the Site of the Proposed Development to the Stagrennan Stream or the Boyne Estuary. As there is no direct pathway, and as the site has previously been cleared of surface vegetation and topsoil, siltation of storm-water is not a feature of the proposed development.*

*Significant effects to water quality within the Boyne Coast and Estuary cSAC, the River Boyne and River Blackwater cSAC and the Boyne Estuary SPA therefore can be ruled out.*



**Figure 3.4 Site Location (indicated by red) and Natura 2000 sites (Source: Enviroguide AA Screening)**

- 3.33 In terms of the 'relative abundance, quality and regenerative capacity of natural resources in the area', the proposed development will not, individually or in combination with other projects, significantly impact on the integrity of the natural resources in the area, having regard to the nature and extent of the proposed development and the character of the receiving environment and the surrounding area. The area in the immediate vicinity of the proposed development has absorption capacity in terms of any environmental effects of the proposed scheme.

### **Cumulative Impacts**

- 3.34 Having regard to the necessity to take into account the criteria under Schedule 7 where relevant for the purposes of compiling the relevant information on the likely effects of the proposed development, this section provides a summary of the cumulative impacts considered throughout this EIA Screening Statement and in the accompanying application reports which have informed the Screening Statement.
- 3.35 The EPA Guidelines on Information to be contained in Environmental Impact Assessment Reports (draft, 2017) defines 'Cumulative Effects' as:

*“The addition of many minor or significant effects, including effects of other projects, to create larger, more significant effects.”*

- 3.36 In preparing this statement and the supporting documentation submitted herewith, the authors and design team have been cognisant of relevant existing, ongoing, and permitted developments in terms of the potential for cumulative impacts on the environment. Any predicted cumulative impacts arising from the proposed development in combination with other existing and permitted projects are outlined in this EIA Screening Statement and where relevant in the various reports accompanying the SHD application, which have helped inform this EIA Screening Statement.
- 3.37 It is noted that the application includes references to the potential future development of an extension to the commercial element of the Southgate Centre on adjoining lands. Any such extension would be subject to a separate future planning application including EIA Screening / EIAR if required and would be required to take into account the cumulative effects of this project, and as such it is not practically possible to assess the cumulative effect of such potential future development in great detail. It is however expected that any such future development would result in additional visual impact on the surrounding area, providing for a completion of the overall block and a unified building line and architectural approach. Such future development would also have a positive impact in terms of employment creation and the working population in the area.
- 3.38 The principal permitted developments, where relevant, considered for their cumulative effects in this EIA Screening Statement and accompanying application reports are outlined below. Other developments may also have been assessed depending on the relevant sensitivities and receptors identified in other specialist reports accompanying this application, which have informed the EIA Screening Statement.

***Meath County Council Reg. Ref.: P99/989 and ABP Reg. Ref.: PL17.119445***

- 3.39 In terms of cumulation with existing development, the site development works for residential neighbourhood of 130 acres was subject to an EIA under Reg. Ref.: 99/989 and ABP Reg. Ref. PL17.119445. These lands are located between Dublin Road, Colp Road and the Dublin/Belfast railway line to the east. The site has been subject to a number of residential applications and is now largely built out.
- 3.40 Planning permission was granted for a housing development consisting of 93 semi-detached dwellings, 3 bungalows and 5 detached garages and this decision is upheld by An Bord Pleanála under PL17.119444. This represented phase 1 of the overall site development works associated with PL119445.

***Meath County Council Reg. Ref.: SA/40196 and ABP Reg. Ref.: PL17.212344 – Mixed Development (Southgate Centre)***

- 3.41 The adjoining site to the south east was granted planning permission under Reg. Ref.: SA/40196 and ABP Reg. Ref.: PL17.212344 for a mixed use development with an overall gross floor area of 17,350 square metres (excluding residential units) ranging in height from two storeys to five stories over basement. The development comprised the following mix of uses (a) 60 number apartments (12 number three bedroom, 32 number two bedroom and 16 number one bedroom) with open space areas including balconies and roof garden, (b) leisure complex (including swimming pool), (c) local pub (180 square metres and restaurant/cafes (1,414 square metres), (d) retail units including storage and service areas, comprising one supermarket (1,750 square metres net retail floor area) and 15 number unit shops gross floor area 1,964 square

metres (ranging in size from 78 square metres to 240 square metres), (e) office uses (5,598 square metres) including six number own door units, (f) medical centre (858 square metres) and crèche/library (339 square metres), (g) 562 number of car parking spaces (308 number basement and 254 number surface), cycle parking, and (h) the demolition of two habitable dwellings. on a site of 2.71 hectares. That permission has been subject to a number of changes of use applications, but has been constructed.

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

- 3.42 This section is intended to provide a clear statement on the aspects of the environment that are likely to be affected by the proposed development. The likely significant impacts of the proposed development on the aspects of the environment will be addressed later in this report.

**Population & Human Health**

- 3.43 European Commission guidance relating to the implementation of the 2014 Directive, in reference to Human Health, states, '*Human health is a very broad factor that would be highly project dependent. The notion of human health should be considered in the context of other factors in Article 3(1) of the EIA Directive and thus environmentally related health issues (such as health effects caused by the release of toxic substances to the environment, health risks arising from major hazards associated with the project, effects caused by changes in disease vectors caused by the project, changes in living conditions, effects on vulnerable groups, exposure to traffic noise or air pollutants) are obvious aspects to study.*<sup>4</sup>
- 3.44 The Draft EPA Guidelines on the information to be contained in environmental impact assessment reports states that '*in an EIAR, the assessment of impacts on population and human health should refer to the assessments of those factors under which human health effects might occur, as addressed elsewhere in the EIAR e.g. under the environmental factors of air, water, soil etc*<sup>5</sup>.'
- 3.45 The subject site is located in an area zoned for mixed use development as set out in the *Meath County Development Plan, 2013-2019*.
- 3.46 In terms of Core Strategy, the site comes within the Drogheda Environs of the county development plan. A housing allocation of 857 units was provided for this area, in addition to 1,174 no. committed units over the plan period. There has been very limited housing delivery in the Southern Environs of Drogheda. Furthermore, the Core Strategy of the current Development Plan took into account a significant number of units which were subject to active planning permissions at that time. A significant number of those 'committed' units were never delivered, with the permissions now having expired. On that basis, there is considered to be a considerable shortfall in the delivery of housing in the southern environs of the town at present. A similar situation prevails in the northern area of the town, which falls under the jurisdiction of Louth County Council.
- 3.47 As of the 2016 census, the total population for the Drogheda settlement was 40,956. This represents an increase of 2,378 over the intercensal period, or 6.2%. Nationally,

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<sup>4</sup> Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report, European Commission, 2017 <http://ec.europa.eu/environment/eia/ria-support.htm>

<sup>5</sup> Guidelines on the information to be contained in environmental impact assessment reports, EPA, 2017 (draft)

the population of the state grew by 3.7%, which indicates that the population of Drogheda had a positive growth rate over this period. Over the same period, housing stock increased by 112, or 0.7%. This would indicate that there is likely to be a shortfall in supply to meet demand. The table below provides for a population breakdown of the Drogheda Settlement by age group for each of the last two Census periods, with the percentage change for the intercensal period included. This shows that there has been a decrease in the numbers in the family formation age group, which might reflect the limited supply of housing in the area.

**Table 1: Drogheda Settlement Demography 2011-2016**

Age Group	2016	2011	Population Change	% Population Change
0-19	12,264	11,442	882	7.7%
20-39	11,648	12,601	-953	-7.5%
40-59	10,848	9,276	1,572	16.9%
60-79	5,180	4,462	718	16%
80+	1,016	797	219	27.4%
Total	40,956	38,578	2,378	6.1%

**Source: CSO**

- 3.48 The proposed development is likely to give rise to a population increase of the order of circa 422 persons (201 \* 2.1 persons – this figure being the average occupancy of apartments in the 2016 Census of Population). This would increase the population of Drogheda by circa 1%.
- 3.49 The application will generate a requirement for childcare. The national average percentage of population of children between the ages of 0-4 years of age in the 2016 Census of Population was 7%. This would give rise to a childcare demand of circa 30 children. Working on the basis of 20 childcare spaces per 75 residential units, excluding one bedroom units as recommended in the Apartment Guidelines 2018, this would generate a demand for 40 spaces. A letter accompanying this application demonstrates that there is capacity for childcare spaces in the adjoining childcare facility.
- 3.50 There may be possible short-term nuisances to human beings from noise, vibration and dust during construction and from construction related traffic. The CEMP minimisation measures to ensure that pollution and nuisances arising from demolition, site clearance and construction activities is prevented where possible and managed in accordance with best practice and any subsequent planning conditions relevant to the proposed development.
- 3.51 The construction works include ground preparation works, excavation of the basement, development of site infrastructure, construction of buildings and hardstanding areas and landscaping of the site including open soft landscaped areas.
- 3.52 The accompanying Traffic and Transport Assessment prepared by DBFL concludes that there are no significant traffic or transportation related impacts arising from the proposed residential development.
- 3.53 There will be a short term increase on construction employment during the construction period. At operation stage, there will be an increase in housing supply in the area. The proposal will make optimal use of the subject lands and deliver compact growth and densification at an appropriate location. The proposed use will complement its surroundings and constitutes sustainable development of the site.

- 3.54 A Daylight and Sunlight Assessment prepared by Avison Young has been included with the application documentation which considers the impact on the surrounding properties and facilities. The results find [that the proposed development will meet 100% compliance with the ADF targets within the BRE Guidance, while also performing strongly in terms of no-skyline assessment, internal sunlight amenity and light to communal and public open spaces.
- 3.55 Similarly, the scheme was determined to have no significant impact on neighbouring properties or their open spaces.

### ***Biodiversity***

- 3.56 The subject land is an infill site, which has been subject to previous ground works. The proposed development will involve the felling of the trees on site. The number of trees to be felled relating to the proposed development are 26 and four groups of trees/hedgerows. We refer to the Arboricultural Report for further details, however in summary all trees to be removed are of low quality and value (C category).
- 3.57 We refer the Board to the Ecological Impact Assessment (EclA) prepared by Enviroguide Consulting which assesses the potential effects of the proposed development on habitats and species, particularly those protected by national and international legislation or considered to be of particular nature conservation importance. The EclA finds the existing habitats are highly modified and disturbed and are therefore considered to be of low ecological value. The existing treeline on the western boundary of the site is considered of local importance (higher value) as it provides connectivity for birds and mammals and likely supports nesting birds, small mammal and possibly commuting/foraging habitat for Bats.
- 3.58 A Bat Assessment Report has been carried out at the subject lands. This report, prepared by Wildlife Surveys, notes that no bat roosts were found in the trees on the boundary of the site however bats are foraging in the site, but activity levels are low. In total 4 bat species were recorded at the site including Common pipistrelle *Pipistrellus pipi-strellus*, Soprano Pipistrelle *Pipistrellus pygmaeus*, Brown Long-eared bat *Pleotus auratus* and Leisler's Bat *Nyctalus leisleri*. The EclA finds that the loss of the immature trees and shrubs within the site itself may lead to a reduction in foraging habitat at the site which will have a negative, permanent, moderate impact on the bat species. Increased night-time lighting at the site has the potential to adversely affect bats foraging/commuting over the Site.
- 3.59 A walkover bird survey was completed at the site on 18th November 2020. The EclA sets out that as the site is relatively compact and is largely an open space with low ground cover over the majority, it was considered that the use of transects or quadrat surveying were not required. The EclA finds the proposed development will result in the slight loss of foraging habitat with the site clearance of the recolonising bare ground and scrub habitats at the site. This will have a negative, permanent, slight impact at a local level to birds in the absence of mitigation. The EclA also notes the following:

*“The walkover bird survey for this report was carried out in November and as such some breeding species may not have been present at the Site at that time. However we have assumed that all bird species recorded during this survey have the potential to breed and as such it is recommended that an Ecological Clerk of Works be appointed at the commencement of works to ensure that any species of birds that may be nesting on the site are duly protected until their breeding cycle is complete and the*

*young have fledged. In this way any bird species that may breed on the site will be afforded the same level of protection as those known to do so.”*

- 3.60 The closest Natura 2000 sites to the Site of the Proposed Development are the River Boyne and River Blackwater cSAC and SPA located ca. 1.9km to the north of the Site. No direct hydrological connections exist linking the Site of the Proposed Development and Boyne Estuary and associated designated sites. The EclA notes an indirect connect will exist through the discharge of treated foul water generated by the proposed development once operational, however sufficient capacity exists to successfully treat the expecting additional loading from the additional development once completed. As such the EclA states *“it is not deemed that this indirect hydrological pathway has the potential to cause significant impacts to the Boyne Coast and Estuary pNHA or any ecological sensitivities associated with this transitional waterbody.”*
- 3.61 Any potential impacts on European sites are fully appraised in the accompanying Appropriate Assessment Screening Report.

### ***Lands, Soils and Geology***

- 3.62 The subject lands are generally undeveloped at present, and as noted above have been subject to previous ground works.
- 3.63 The site is underlain by limestone and shale and the aquifer is identified as locally important. There are no discharges to ground on site currently and there will be no discharges to ground from the proposed project
- 3.64 The Geological Survey of Ireland online data base was consulted regarding areas of geological interest in the area of the proposed project site and this confirmed that no geological heritage site has been identified in the vicinity of the proposed project site.
- 3.65 Bulk excavation of the basement will occur, the volume of excavation proposed is of the order of 25,000 cubic metres. Excess soils will be reused on site in landscaping and foundation formation where possible, however, it is estimated that to circa 3,900 tonnes of soils and stone being exported from the site. Material, which is exported from site, if not correctly managed or handled, could impact negatively on human beings (onsite and offsite) as well as water and soil environments. All waste soils prior to being exported off-site, shall be classified as inert, non-hazardous or hazardous in accordance with the EPA's Waste Classification Guidance to ensure that the waste material is transferred by an appropriately permitted waste collection permit holder and brought to an appropriately permitted or licensed waste facility.
- 3.66 The potential impacts during the construction phase are required to be mitigated by ensuring best practice construction with respect to storage of any hazardous substances (fuels, chemicals and other construction materials that may pose a risk to the environment).
- 3.67 During operation there is no proposed bulk chemical storage, and no emissions to the land or groundwater other than stormwater from roof and hardstand areas.

### ***Water***

- 3.68 The proposed development is not located adjacent to any significant watercourse. The proposed development is located approximately 1.5 km to the south of the

boundary of SACs and SPA in the Boyne Estuary at their nearest points. The site is likely to be within the catchment of the Stagrennan Stream, which discharges to the Boyne Estuary. This is within the tidal range of the River Boyne.

- 3.69 The underlying aquifer is a locally Important aquifer which is generally moderately productive. The groundwater body status was “good” to 2018 and is currently “ under review”. The site does not lie within a group scheme or public supply scheme drinking water protection area.
- 3.70 The GSI Well Card Index is a record of wells drilled in Ireland, water supply and site investigation boreholes. It is noted that this record is not comprehensive as licensing of wells is not currently a requirement in the Republic of Ireland. This current index does not show any wells drilled or springs at the site with the nearest recorded wells located 1.5 km to the east and north west of the site.
- 3.71 The Infrastructure Design Report prepared by DBFL addresses the surface water, water and foul drainage requirements of the proposed development.
- 3.72 The proposed development has been designed in order to comply with the Greater Dublin Drainage Study (GDDS), as well as other relevant guidance. This is detailed further within the accompanying Infrastructure Design Report prepared by DBFL Consulting Engineers. As a result the increase in hardstanding will not result in any off site flooding.
- 3.73 There is one surface water outfall point identified for receiving attenuated surface water runoff from the subject site. Surface water will be discharged via 225mm diameter pipe to an existing 375mm diameter pipe located northwest of the subject site. This existing 375mm diameter pipe runs northwest through Grange Rath housing estate and discharges to the north of the subject site.
- 3.74 The disposal of foul water from the site is separated from that of surface water and the required connection point has been approved by Irish Water and MCC. This comprises a 150mm diameter pipe connecting to the existing sewer system which adjoins the site to the north.
- 3.75 As noted, no direct hydrological connections exist linking the Site of the Proposed Development and Boyne Estuary and associated designated sites. The site located within Flood Zone C, for the purposes of the *Flood Risk Management Guidelines*, 2009. The subject site will be treated as a single catchment for the purposes of dealing with surface water and the development will provide for storage up to a 1 in 100 year storm event.
- 3.76 As with all construction projects there is potential for water (rainfall and/or discontinuous perched groundwater) to become contaminated with pollutants associated with construction activity. Contaminated water which arises from construction sites can pose a significant short-term risk to water quality for the duration of the construction if contaminated water is allowed percolate to the aquifer or accidental discharges into surface water.
- 3.77 Machinery activities on site during the construction phase may result in contamination of runoff into surface water. Potential impacts could arise from accidental spillage of fuels, oils, paints, cement, etc. which could impact surface water if allowed to runoff into surface water systems and/or receiving watercourses.

- 3.78 The project specific CEMP will set out best practice construction methodology to manage the risk of accidental spills and leaks.
- 3.79 During the operational phase there is an indirect pathway via the Drogheda wastewater treatment plan. This is in compliance with prescribed treatment standards and ample capacity exists to accept the likely additional loading from this development.
- 3.80 Water quality or the natural groundwater regime is not likely to be significantly affected by the proposed development and committed development, It is not considered that any significant environmental impact will arise from the proposed development on water.
- 3.81 A Site Specific Flood Risk Assessment prepared by DBFL is submitted with the application. This confirms the attenuation system for the proposed development has been sized for a 1 in 100-year return period, which exceeds the requirements of the GDSDS and it is designed using the current rainfall depth values available from Met Eireann including 20% increase for the effects of climate change.

### ***Air & Climate***

- 3.82 Air quality monitoring programmes have been undertaken by the EPA and Local Authorities over the past number of years. The EPA website details the range and scope of monitoring undertaken throughout Ireland and provides up to date monitoring data. The nearest monitoring points to the subject site are located at Navan, Dundalk and Swords, with no current air quality monitoring stations in the immediate vicinity of the proposed development. At the time of writing of this report, the monitoring stations recorded 'Good' air quality across all pollutants monitored for.
- 3.83 In terms of construction dust impacts, the concern from a health perspective is focussed on particles of dust which are less than 10 microns (PM10) and less than 2.5 microns (PM2.5). With regards to larger dust particles that can give rise to nuisance dust, there are no statutory guidelines regarding the maximum dust deposition levels that may be generated during the construction phase of a development in Ireland.
- 3.84 There may be a minor degradation of the air quality in a very localised area during certain parts of the construction process. Standard mitigation measures would be appropriate as set out in the accompanying Construction and Environment Management Plan (CEMP). It is considered that there will be no negative impact on air quality or the climate arising from the proposed development.
- 3.85 The Contractor shall continuously monitor dust over the variation of weather and material disposal to ensure the limits are not breached throughout the project. The Construction and Environment Management Plan submitted herewith contains mitigation measures to ensure that there is no risk of a significant impact in terms of air quality or climate during construction.
- 3.86 Current EPA guidance states that a development may have an influence on global climate where it represents "a significant proportion of the national contribution to greenhouse gases" (EPA, 2003). The draft "*Guidelines On The Information To Be Contained In Environmental Impact Assessment Reports*" (EPA, August 2017) states that impacts relevant to adaptation to climate change should be assessed and that projects should be assessed in terms of their vulnerability to climate change. The impact to climate from the operational phase of the proposed project, existing and permitted development is expected to be imperceptible in terms of national CO<sub>2</sub>

emissions and Ireland's agreed limit under EU Regulation (EU) 2018/842, which has set a target of a 30% reduction in non-ETS sector emissions by 2030 relative to 2005 levels. The proposed project will not result in any impacts relevant to adaptation therefore the project will not be vulnerable to climate change.

### 3.87 **Noise & Vibration**

- 3.88 The proposed development is located within an existing built up area, with residential properties to the north and east.
- 3.89 During the construction phase it is expected that there will be some temporary impact on the nearest residential properties due to noise emissions from the plant equipment required for construction. However, given that the construction phase of the development is short term in duration, it is expected that the various noise sources will not be excessively intrusive.
- 3.90 Subject to mitigation measures, as outlined in the CEMP and discussed further below, there is no significant noise impact likely on neighbouring properties during construction. These measures include the application of binding hours of operation, along with implementation of appropriate noise and vibration control measures, which will ensure that noise and vibration impact is kept to a minimum. The potential for noise impacts is negligible post construction.

### **Landscape**

- 3.91 The site is zoned for development and there are no specific amenity, landscape or visual objectives pertaining to the site. The proposed development is consistent with the zoning and existing and emerging character and land use of the surrounding area. There are no Architectural Conservations (ACA's) which are immediately relevant to the subject site.
- 3.92 As part of the development of the land it will be necessary to remove some trees. We refer to the Arboricultural Report for further details, however in summary a total of 26 and four groups of trees/hedgerows are to be felled. All trees to be removed are of low quality and value (C category).
- 3.93 The landscape and visual impact of the proposed development on the surrounding area is assessed in the Landscape and Visual Impact Assessment (LVIA) prepared by Dermot Foley Landscape Architects, and illustrated in the photomontage brochure accompanying this application, which have been prepared by Digital Dimensions.

### **Material Assets**

- 3.94 The land on which the site is situated is a material asset. It has been zoned for mixed use and residential development through the appropriate process, and as such, the use of this material asset in a manner compatible with the zoning designation, is entirely appropriate.
- 3.95 The accompanying Transport and Transport Assessment Report (TTA) prepared by DBFL identifies that the site adjoins the R132 – the R132 Dublin Road connects the site to the town centre to the northeast and to Julianstown, Balbriggan, Dublin Airport and Dublin City Centre to the south. The main vehicular access is via Park Heights, which connects to the Colp Road. Both the Dublin and Colp Road have cycling facilities.

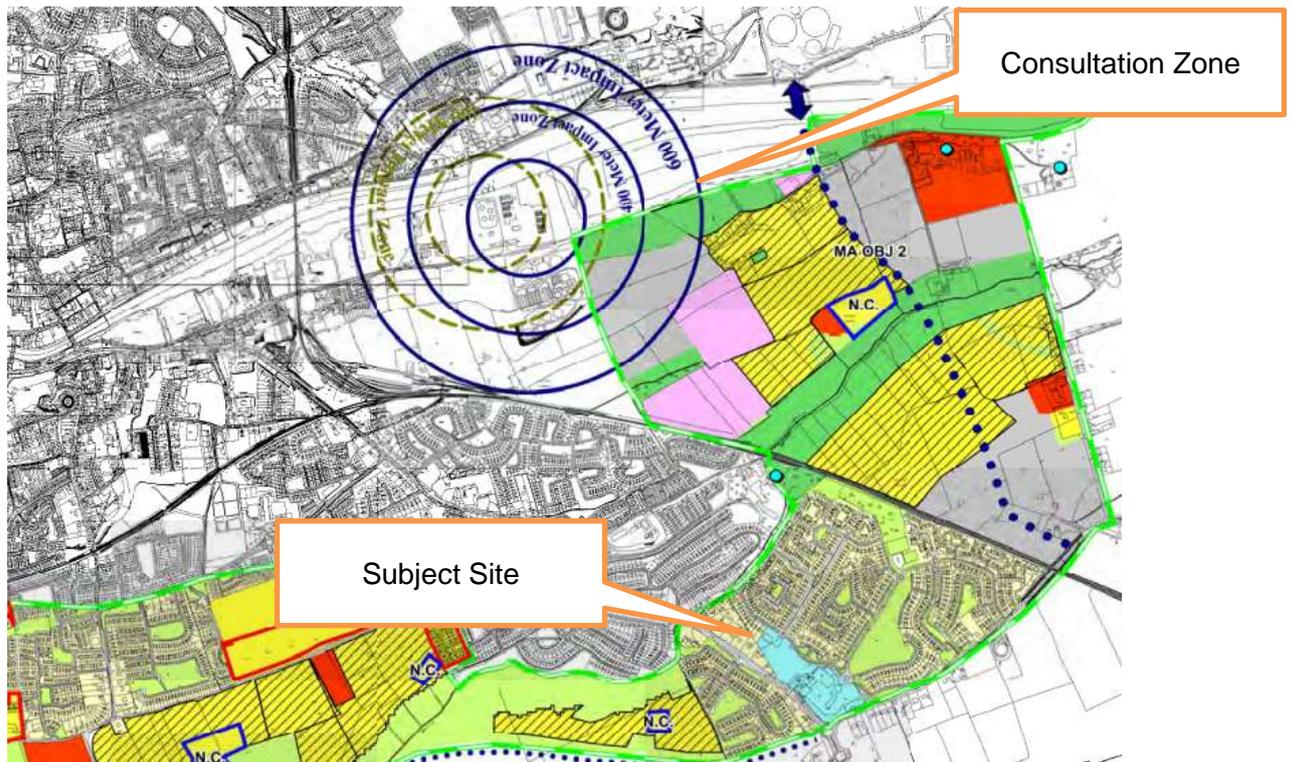
- 3.96 The TTA assessed the impact of the proposed development on surrounding key junctions. Following on from the impact assessment, it was noted that Junction 1 (development site access junction) exceeded the 10% threshold required and therefore was subject to further assessment. An ARCADY model was developed for Junction 1 in order to determine the Do Minimum and Do Something operational performance of this roundabout. The results showed that the roundabout operated within capacity in all scenarios assessed for both the Do Minimum and Do Something assessments.
- 3.97 The TTA also outlines an impact assessment was conducted at off site junctions within the Drogheda Town (Bull Ring Junctions), and it was determined that there would be a negligible impact on the Bull Ring junctions from development trips.

### **Archaeology, Architecture and Cultural Heritage**

- 3.98 An Archaeological Assessment Report has been prepared and is submitted with the application. The assessment has employed a variety of sources including non-intrusive walkover survey to make a coherent assessment of the archaeological and cultural heritage risk associated with the project.
- 3.99 The accompanying archaeology report sets out the following in relation to the potential impact of the proposed development:
- *“The proposed residential area is in proximity to three recorded monuments; ME021-024; ME021-023; and ME021-018 all Fulachta Fia.*
  - *The field survey identified a site which has been much altered through construction activity over the last few years.*
  - *No potential archaeological features were recorded in historical maps of the subject site.*
  - *No potential archaeological features were recorded from aerial photographs of the subject site. The Google Earth image from 2007 shows the site to have been heavily disturbed from construction activity.*
  - *There are no visible remains of the medieval church of Colpe (ME021-012004-) the location of which lies approximately 1200m east of the residential development.*
  - *There are only two entries within 1 km of the subject site on the Record of Protected Structures; Stameen House, RPS no. DB-056; and Outbuildings, RPS no. ME020-124. Both of these structures are over 500m to the north of the site and are surrounded by modern housing estates*
  - *Previous excavations to the immediate east of the site (Grange Rath housing estate) revealed a large range of archaeological features including a small ringfort with eight additional enclosures and cereal- drying kilns indicating an extensive and prosperous settlement (Murphy 2011)”*

### **Vulnerability of the project to risks of major accidents and/ or disasters**

- 3.100 The subject lands are not proximate to any Seveso/COMAH designated sites. The closest Seveso site is the Flogas facility at Marsh Road, which is approximately 1.6 kilometres from the subject site. This places the subject site significantly outside the consultation zone for this Seveso site (600 metres). A further site, located adjacent to the Flogas site (Maxol Ltd) has a consultation zone of 400 metres, which the subject site also falls well outside.



**Figure 3.3: Extract from Development Plan zoning map indicating distance from consultation zones**

- 3.101 The ECFRAMS and ICPSS indicates that the subject site is within Flood Zone C, with a low probability of flooding. This is set out within the accompanying site specific flood risk assessment report prepared by DBFL.
- 3.102 The potential impact of climate change has been allowed for in the design of the surface water drainage network and storage system, with an allowance for a 10% increase in rainfall intensities, as recommended by the GSDS (Greater Dublin Strategic Drainage Study).
- 3.103 In regard to traffic safety, the site has been subject to a road safety audit, which finds the site provides safe access. A Construction and Environmental Management Plan sets out in section 5 that as part of Construction Stage Safety Plan for the construction works, a Traffic Management Plan will be prepared.
- 3.104 The physical characteristics of the site do not require specialist construction methods. The CEMP describes standard construction practices.
- 3.105 The Geological Survey Ireland (GSI) landslide database was consulted, the, and the nearest landslide to the proposed development was 5 km to the north, and north west. There have been no recorded landslide events at the site. Due to the local topography and the underlying strata the Susceptibility Classification is low and is a negligible risk of a landslide event occurring at the site.

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

- 3.106 The above demonstrates that the interrelationship between different aspects of the environment have been considered in assessing the proposed development. The relationship between construction, dust, noise, and threat of pollution has been considered in terms of biodiversity and human health. The issue of flooding, climate

change and human health has been considered. The interrelationship between architectural heritage, landscape assessment and retention of trees have been assessed. Traffic safety and human health has been considered. No impacts are likely to exacerbate the impacts on the environment from this proposed development.

3.107 The proposed development will result in an increase in development on a currently undeveloped site. Mitigation is included in the project design to minimise impacts on the receiving environment. Each project currently permitted in the wider area is subject to planning conditions which include appropriate mitigation measures to minimise environmental impacts. Provided that mitigation measures for other developments are implemented as permitted, there will be no significant cumulative effects. Based on the assessment of the environmental sensitivities in the existing environment and assessment of cumulative impacts, it is concluded that there are no likely environmental impacts which would warrant preparation of an EIA.

**(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**

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

3.108 The EPA *Draft Guidelines on the information to be contained in Environmental Impact Assessment Reports 2017* require that the direct, indirect, cumulative and residual impacts of the proposed development for both the construction and operational stages are described. The identified quality, significance and duration of effects for each aspect are categorised, as set out below. Quality refers to the nature of the impact, significance of effects refers to the degree that these will impact on the site and surrounding area and duration refers to how long the effects are likely to last for. A direct impact is an impact the development will give rise to. An indirect impact is similar to a secondary impact – it may result in consequences not in the immediate vicinity of the site. Cumulative impacts are impacts that arise in conjunction with other consented developments. Residual impacts are those which remain after mitigation measures have been applied. Where relevant, impacts arising from the proposed development will be assessed on this basis.

**Table 1.1** Quality of Potential Effects

Quality of Effects	Definition
Negative	A change which reduces the quality of the environment
Neutral	No effects or effects that are imperceptible, within the normal bounds of variation or within the margin of forecasting error.
Positive	A change that improves the quality of the environment

3.109 The significance of an effect on the receiving environment are described as follows:

**Table 1.2** Significance of Effects

Significance of Effects on the Receiving Environment	Description of Potential Effects
Imperceptible	An effect capable of measurement but without significant consequences.

Not Significant	An effect which causes noticeable changes in the character of the environment but without significant consequences.
Slight	An effect which causes noticeable changes in the character of the environment without affecting its sensitivities.
Moderate	An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends.
Significant	An effect which, by its character, magnitude, duration or intensity alters a sensitive aspect of the environment.
Very Significant	An effect which, by its character, magnitude, duration or intensity significantly alters a sensitive aspect of the environment.
Profound	An effect which obliterates sensitive characteristics.

3.110 The duration of effects as described in the Draft EPA Guidelines are:

**Table 1.3** Duration of Effects

Duration of Impact	Definition
Momentary	Effects lasting from seconds to minutes
Brief	Effects lasting less than a day
Temporary	Effects lasting one year or less
Short-term	Effects lasting one to seven years
Medium-term	Effects lasting seven to fifteen years
Long-term	Effects lasting fifteen to sixty years
Permanent	Effects lasting over sixty years
Reversible	Effects that can be undone, for example through remediation or restoration

3.111 The proposed development is located in a suburban context, with retail and residential uses the predominant land use. The proposed use is therefore consistent and compatible with land in such a location. The works during the construction phase are likely to have a short term moderate impact on the immediate area.

3.112 Having regard to the necessity to take into account the criteria under Schedule 7 , where relevant for the purposes of compiling the relevant information on the likely effects of the proposed development, reference should be made to *“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”* and the characteristics of the impacts, which are addressed further below. Under Section 171A of the Planning and Development Act 2000, as amended, the effects of the proposed development on the following factors needs to be evaluated in an “environmental impact assessment”:

- i. “population and human health;*
- ii. biodiversity, with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive;*
- iii. land, soil, water, air and climate;*
- iv. material assets, cultural heritage and the landscape;*
- v. the interaction between the factors mentioned in clauses (I) to (IV)”*

3.113 The above topics are considered below.

### **Population & Human Health**

- 3.114 The proposed development will provide much needed housing. One bed, two bed and three bed apartments will be provided. The range of housing provided will help meet different housing demands in the county. The long term impact is considered positive, moderate and long term in duration.
- 3.115 The proposed development is adjacent to childcare, retail and employment opportunities. This will encourage active use, with consequential health benefits. The long term impact is considered positive, moderate and long term in duration.
- 3.116 Bruton Consulting Engineers Consulting carried out a Quality Audit, which includes a Stage 1 road safety audit, an access audit, a walking and cycling audit. The impact is estimated to long term, moderate and positive in effect.
- 3.117 The Traffic and Transport Assessment report concludes *“that are no traffic or transportation related reasons that should prevent the granting of planning permission for the proposed residential development.”*
- 3.118 The site is in walking distance of the Drogheda Rail Station. Bus Éireann service number 101 and 101X currently connects Southgate and Drogheda. There are cycleways adjacent the site on the R132. DBFL identify in their Transport and Traffic Assessment (Page 11) that:
- “The subject site is served by two Bus Éireann services, route numbers 101 and 101X. Bus Éireann service number 101 currently connects Southgate and Drogheda with Balbriggan, Dublin Airport and Dublin City Centre. The bus route is operated daily, with the nearest bus stop to the subject site being only 180m away on the R132 Dublin Road.*
- A private coach company, Matthews, operates two routes which service the subject site; route numbers 910 and 912. The more frequent 910 operates daily and connects Southgate to Bettystown, Laytown and Dublin City Centre. One service per day operates from Southgate to the UCD Belfield Campus, as well as one service per day operating in the opposite direction. Both Matthews coach routes are served by a bus stop located approx. 650m from the subject site.”.*
- 3.119 This will reduce reliance on private vehicular use. The long term impact is considered positive, moderate and long term in duration.
- 3.120 There will be short term, slight negative impacts during the construction period arising from noise, vibration dust and construction traffic, but these can be mitigated, as set out in the construction management plan. A site specific construction traffic management plan will be prepared by the contractor and submitted to the planning authority.
- 3.121 The construction phase of the proposed development will provide for the temporary employment of construction workers which is likely to provide benefits for local businesses providing retail or other services to construction workers and potentially could create some additional employment in the area.
- 3.122 Following implementation of the mitigation measures described below in respect of each of the different aspects of the environment, it is considered that the residues and emissions arising from the proposed development are not considered likely to have significant effects on population and human health during either the construction or operational phase.

### **Biodiversity**

- 3.123 The Ecological Impact Assessment Report (EclA) prepared by Enviroguide finds that the entire site will be stripped resulting in the loss of any existing semi-natural habitats present (recolonising bare ground, and scrub) in order to facilitate the proposed development. The EclA confirms these habitats are not considered to be of any major conservation concern as they are not particularly species rich and are themselves the result of clearance of all natural habitats at the Site in recent times which have remained unmanaged. Mitigation measures are proposed to deal with habitat loss, fauna, hedgehogs and bats.
- 3.124 The EclA concludes: *“It is considered that, provided the mitigation measures proposed within this report are carried out in full, there will be no significant negative impact to any valued habitat, designated site or individual or group of species as a result of the Proposed Development.”*
- 3.125 The EclA also confirms that due to the lack of direct hydrological connections from the proposed development to any designated sites, and the distances between the site of the proposed development and any other of the listed designated sites, there is no possibility for potential significant impacts on water quality at these sites, and/or any other adverse impact, as a result of the proposed development. Therefore, no mitigation is recommended.
- 3.126 Separately an AA Screening Report has been prepared. The pathways to Natura 2000 sites from sources on site and the in-combination effects on Drogheda Waste Water Treatment Plant are also considered. The AA Screening Report confirms:

*“In conclusion, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is considered by the authors of this report that, the possibility may be excluded that the Proposed Development will have a significant effect on any of the European sites listed below:*

- *Clogher Head SAC;*
- *River Nanny Estuary and Shore SPA; and*
- *River Boyne and River Blackwater SPA*
- *Boyne Coast and Estuary cSAC,*
- *River Boyne & River Blackwater cSAC; and*
- *Boyne Estuary SPA*

*These complete precise and definitive findings based on the best available scientific evidence, remove all reasonable scientific doubt that the proposed Development will have any likely significant impacts on the European Sites detailed above. In addition, no measures intended to avoid or reduce the potential harmful effects of the project on a European Site have been taken into account in this Appropriate Assessment Screening Report and its conclusions.*

*Accordingly, a Stage 2 Appropriate Assessment is not required to be carried out in relation to the Proposed Development.”*

- 3.127 On the basis of the foregoing and having regard to the evidence set out within the Appropriate Assessment Screening Report and the and mitigation measures set out in the Ecological Impact Assessment, the nature and extent of the proposed development, it is considered that the proposed development will not result in any likely significant impact on biodiversity.

## Lands and Soils

- 3.128 The proposed development will require the excavation and removal of 3,900 tonnes of soil from the site and addition of hard stand in place of greenfield. The impact will be long term, not significant and neutral. The removal will give rise to noise and dust as part of the construction. These emissions will be controlled to an acceptable level through the construction and environmental management plan. The construction impact will be short term insignificant and neutral.
- 3.129 The proposed project together with existing development and committed development will not have a significant effect on the land, soil environment during the construction and operational phases.

## Water

- 3.130 The proposed development will be served by potable water and wastewater from a public water supply and wastewater infrastructure which has adequate capacity. There is no discharge to ground, the sites are not liable for flooding and there no direct pathways to the Boyne Coast and Estuary cSAC, the River Boyne and River Blackwater cSAC and the Boyne Estuary SPA. Any accidental discharges will be managed to an acceptable level through the construction and environmental management plan and as such the impact during construction is short term insignificant and neutral. There is no likely potential for a significant impact on receiving waters.
- 3.131 It is proposed to discharge foul flows from the proposed development by gravity to the existing 300mm diameter foul sewer, in the north west corner of the site. The AA Screening Report states the development will not have a negative impact stating:

*“There is potential for proposed plans and projects within the Meath County Development Plan and the Louth County Development Plan land area, to have cumulative, negative impacts on conditions in the River Boyne and the Boyne Estuary via surface water features and foul waters treated at Drogheda WWTP and discharged from there into the Boyne Estuary. However, core strategy, policies and objectives of the County Development Plan have been developed to anticipate and avoid the need for developments that would be likely to significantly affect the integrity of any European site. Furthermore, such developments are required to conform to the relevant regulatory provisions for the prevention of pollution, nuisance or other environmental effects likely to significantly affect the integrity of European Sites.*

...

*The increasing expansion of Drogheda also places pressure on the existing wastewater infrastructure, which currently discharges to the Boyne Estuary. There is design treatment capacity of 101,600 population equivalent (P.E.). Treatment capacity is an assessment of the hydraulic (the amount of wastewater) and the organic (the amount of pollutants) load a treatment plant is designed to treat versus the current loading of the plant. In the 2019 Annual Environmental Report (AER) submitted to the EPA, the reported collected load (peak week) was 75,026 P.E. This indicates that sufficient capacity exists to successfully treat the expected additional loading from this development once completed. The 2019 AER for the plant states that capacity is not likely to be exceeded within the next three years.”*

- 3.132 In terms of surface water, the drainage from the site has been designed to accommodate a 1% AEP rainfall event plus an allowance for climate change. The

proposed SUDS method of water disposal at the site will ensure that no negative impacts to surface water leaving the site will arise due to the attenuation measures planned. The impacts will be long term, slight and positive.

- 3.133 The AA screening report notes that there is no hydrological connecting between the subject site and the Stagrennan stream or Boyne Estuary, stating:

*“The Stagrennan Stream (EPA code: 07S32) is located 0.3km north of the project site and is mapped by the EPA as flowing in an easterly direction. This watercourse then flows into the Boyne Estuary and the Boyne Coast and Estuary cSAC and the Boyne Estuary SPA approx. 3km downstream.*

*There is no hydrological connection between the Site of the Proposed Development and the Stagrennan stream or the Boyne Estuary. There are also no drainage ditches at the site of the Proposed Development and there is no following water course linking the Site of the Proposed Development to the Stagrennan Stream or the Boyne Estuary. As there is no direct pathway, and as the site has previously been cleared of surface vegetation and topsoil, siltation of storm-water is not a feature of the proposed development.*

*Significant effects to water quality within the Boyne Coast and Estuary cSAC, the River Boyne and River Blackwater cSAC and the Boyne Estuary SPA therefore can be ruled out.*

- 3.134 A Site Specific Flood Risk Assessment prepared by DBFL details the appropriate strategy for the attenuation and disposal of storm waters in the event of flooding. Furthermore, the SUDS strategy employed will attenuate storm flows across the site, thereby reducing flood risk downstream of the site.
- 3.135 The CEMP prepared by DBFL sets out standard mitigation measures relating to sediment and water pollution control and surface water drainage works to be undertaken on site. Having regard to the foregoing, it can be concluded that water quality is not likely to be significantly affected by the proposed development.

### **Air and Climate**

- 3.136 During construction the proposed development will give rise to dust. Mitigation measures proposed in the accompanying construction and environmental management plan will ensure dust suppression techniques so as to remain within acceptable levels. These include construction techniques, wheels washing, hard sweep surface roads, spray exported site haul roads, control vehicle speeds, locate any stockpiles away from sensitive receptors and provide tarpaulins over unacceptable excavated materials being removed from the site. The impact will be short term, slight and negative. On the basis of these mitigation measures being implemented, it is concluded that the proposed development will not lead to any significant impact on air quality during the construction phase.
- 3.137 In terms of climate, the proposed development incorporates measures to ensure the energy efficiency of the proposed buildings. The Building Lifecycle submitted with the application sets out a range of measures incorporated into the design and fitting of the scheme to ensure it achieves a high standard of energy efficiency:
- A Building Energy Rating (BER) certificate will be provided for each apartment in the proposed development which will provide detail of the energy performance of the apartment. A BER is calculated through energy use for

space and hot water heating, ventilation, and lighting and occupancy. It is proposed to target an A2 rating for the apartments this will equate to the following emissions which are in line with NZEB.

- Lower U-values and improved air tightness is being considered to help minimize heat losses through the building fabric, lower of energy consumption and thus minimize carbon emissions to the environment.
- The site lighting has been designed to provide a safe environment for pedestrians, cyclists and moving vehicles, to deter anti-social behaviour and to limit the environmental impact of artificial lighting on existing flora and fauna in the area. Having PECU allows for the optimum operation of lighting, which minimizes costs.
- Each of the apartments will have an Exhaust Air Heat Pump installed where the heat pump extracts heat from the exhaust air of the apartment and transfers the heat to the supply air, hot water and heating system.
- Natural ventilation is being evaluated as a ventilation strategy to minimize energy usage and noise levels.
- Mechanical heat recovery ventilation will provide the ventilation requirements of Part F and has low energy usage. MVHR will be installed in all the apartments and all common areas.
- Ducting shall be provided from a local landlord distribution board to designated E-car charging car park spaces. This will enable the management Company the option to install a number of E-car charging points within the basement carpark to cater for E-car demand of the residence. This system operates on a single charge point access card. A full re-charge can take from one to eight hours using a standard charge point.

3.138 On the basis of the foregoing measures and bearing in mind the scale and size of the proposed development, it can be concluded that the proposed development will not result in any significant impact on the climate.

3.139 The design of the development, including the water attenuation and drainage systems on site, take into account additional intensity of storm events based on future climate change.

3.140 It is not anticipated that the proposed development will have any significant impact on the air and climatic environment of the surrounding area following the implementation of mitigation measures.

### ***Noise & Vibration***

3.141 During the construction phase, it is anticipated that construction traffic will consist of private vehicles owned and driven by site construction and supervisory staff and excavation plant and dumper trucks involved in site development works and materials delivery vehicles. We refer to Section 4 of the Construction and Environmental Management Plan which sets out that construction works shall comply with the relevant standard which gives detailed guidance on the control of noise and vibration from construction activities.

3.142 The CEMP sets out noise and vibration limits will be applied for the infrastructure works, and a noise and vibration monitoring specialist will be appointed to periodically carry out independent monitoring of noise and vibration during random intervals and at sensitive locations for comparison with limits and background levels.

3.143 It is considered that there will be no significant noise or vibration effects on the environment during the operational phase and construction phase subject to standard

construction mitigation measures. These mitigation measures are set out in the CEMP prepared by DBFL.

- 3.144 Any impacts from noise and vibration will be temporary and slight, subject to implementation of the construction mitigation measures,

### **Landscape**

- 3.145 The landscape has been a formative influence on the design of the proposed development. The Architectural Design Statement prepared by KMD Architects provide a rationale for the layout of the proposed development.

- 3.146 There are no significant existing trees within the site, however the loss of trees will be mitigated by replacement and additional planting implemented as part of the development. This planting plan is detailed within the Landscaping Design Rationale and Drawings prepared by Dermot Foley Landscape Architects.

- 3.147 Dermot Foley Landscape Architects have prepared a Landscape and Visual Impact Assessment. This confirms the following:

*“It is considered the initial development will have a moderate effect on the existing predominantly brownfield character of the site. The landscape and visual change will be most pronounced during the mobilisation and construction stage, when activity is unfamiliar and when the existing character of the lands is altered by the removal of excess ground material and vegetation. The changes arising from the initial site development and construction works will have moderate negative landscape and visual effects from the south and east, however the effects will be slight or negligible from other directions.*

*The completed development provides for a positive response to the existing predominantly brownfield site. It provides for a detailed, permeable and site-specific response to the provision of high-quality public open spaces. The open space network provides for an attractive and diverse range of amenity and recreational opportunities. Equally the open space network enhances the strong urban design framework for the site. As a whole the proposed development will make a significant and positive contribution to the townscape of the wider area and the future context of the surrounding lands. Likewise, the proposed network of open spaces will make a significant and positive contribution to the emerging landscape character, biodiversity, amenity and recreational opportunities of the area.”*

- 3.148 On the basis of the contents of the LVIA report submitted with the application, it is concluded that the proposed development will not result in any significant impact on the surrounding landscape.

### **Material Assets**

- 3.149 There will be some waste materials produced in the construction of the proposed scheme which will be disposed of using licensed waste disposal facilities and contractors. The scale of the waste production in conjunction with the use of licensed waste disposal facilities and contractors does not cause concern for likely significant effects on the environment. The accompanying Construction and Demolition Waste and By-Product Management Plan, and Operation Waste Management (OWMP) plans detail the methodologies employed for the control, management, monitoring and disposal of waste from the site. The plan sets out the measures used is to maximise the quantity of waste recycled by providing sufficient waste recycling infrastructure,

waste reduction initiatives and waste collection and waste management information to the residents of the development.

- 3.150 There will be no large scale use of natural resources. The main use of natural resources will be land. The subject lands are greenfield lands which are zoned for residential. The proposed development involves a land take of 1.74 hectares.
- 3.151 Other resources used will be construction materials which will be typical raw materials used in construction of residential developments. The scale and quantity of the materials used will not be such that would cause concern in relation to significant effects on the environment.
- 3.152 Operational Waste management at the development is to be carried out in accordance with all relevant statutory requirements, including where applicable, the requirements of Waste Bye-Laws, Waste Management Act 1996, as amended, and Regulations made thereunder, Protection of the Environment Act 2003 as amended, Litter Pollution Act 2003, as amended Full details of the proposed waste management strategy are set out in the OWMP prepared by Byrne Environmental Consulting Ltd and the Building Life Cycle Report prepared by KMD Architects submitted with this application.
- 3.153 Provided the OWMP is implemented and a high rate of reuse, recycling and recovery is achieved, the predicted effect of the operational phase on the environment will be long-term, neutral and imperceptible
- 3.154 A Traffic and Transport Assessment has been carried out by DBFL Consulting Engineers. The TTA concludes *'that there are no traffic or transportation related reasons that should prevent the granting of planning permission for the proposed residential development.'*
- 3.155 Upon completion, the operational phase will provide an important material asset for the area in terms of high quality residential units with an element of social housing. The long term impacts are significant and positive.

### **Archaeology, Architecture and Cultural Heritage**

- 3.156 The report prepared by Archer Heritage sets out the following:

*"This is a relatively small site which has been subject to much construction disturbance in the recent past. However, it is in an area of considerable archaeological potential containing confirmed archaeological remains. The following recommendations are made subject to the approval of The Department of Culture, Heritage and the Gaeltacht (DCHG).*

*Mitigation Measure 1: It is recommended that archaeological test trenching of the site be carried out under licence to the DCHG prior to construction of the proposed development. Should archaeological material be found in the course of test trenching, further mitigation in the form of preservation-in-situ or preservation-by record (excavation) may be required and subject to consultation with and approval of the DCHG. Following test trenching any subsequent construction groundworks should be monitored by a suitably qualified archaeologist."*

- 3.157 The report states that *"It is anticipated that archaeological requirements for this scheme will be implemented prior to and during the construction phase and there will be no residual impact on archaeology."*

- 3.158 On this basis it is considered that, subject to the above recommendations, the proposed development will not have any significant impact on archaeology, architecture and cultural heritage.

#### **Vulnerability of the project to risks of major accidents and/ or disasters**

- 3.159 The current application puts forward proposed residential development. There are no characteristics of the project itself which pose any significant risk of a major accident or disaster.
- 3.160 As set out above, the subject lands are not proximate to any Seveso/COMAH designated sites. Therefore, it is considered that there is no particular vulnerability to major accidents or disasters associated with Seveso / COMAH sites.
- 3.161 The subject site is located within Flood Zone C. A Site Specific Flood Risk Assessment (FRA) prepared by DBFL and states that the proposed development “...*can be delivered on the site in the context of flood risk to same and that the implementation of mitigation measures, as outlined in this report, can be accommodated by the site’s detailed design and the surface water drainage design.*”
- 3.162 The SSFRA concludes ‘...*the development meets the requirements of The FRA Guidelines and that the proposed development is appropriate to this flood zoning and a justification test is not required.*’
- 3.163 In this regard it is considered that vulnerability of the proposed development to the risk of major accidents or disasters is considered to be slight.

#### *The interaction between the factors mentioned in clauses (I) to (IV)”*

- 3.164 It is considered that any of the previously identified relatively minor impacts could not in themselves be considered significant nor would they cumulatively result in a likely significant effect on the environment. In this regard, the relevant assessments undertaken, have examined and addressed the potential for cumulative effects arising from other ongoing, existing, or permitted developments in the vicinity. No significant environmental impacts are considered to arise.
- 3.165 In relation to cumulative impact, the relevant assessments undertaken, including the AA Screening Report, have examined and addressed the potential for cumulative effects where relevant, arising from other ongoing, existing or permitted developments in the vicinity. It should be noted that, depending on the particular environmental factor, some of the accompanying reports may consider other developments and Development Plan objectives either within the immediate surrounding area or further afield.
- 3.166 The National Planning Framework (NPF) is the Government’s plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040.
- 3.167 National investment planning, the sectoral investment and policy frameworks of departments, agencies and the local government process will be guided by these strategic outcomes in relation to the practical implementation of Ireland 2040. The NPF sets out the importance of development within existing urban areas by “*making better use of under-utilised land including ‘infill’ and ‘brownfield’ and publicly owned sites together with higher housing and job densities, better services by existing facilities and public transport*”.

- 3.168 Objective 3a of the NPF states that it is a national policy objective to “*deliver at least 40% of all new homes nationally within the built up envelope of existing urban settlements*”. The proposed development is a strategically located underutilised site in a built up area. The proposed development is therefore compliant with the objective of the NPF.
- 3.169 There will likely be potential for dust and noise produced during the demolition and construction phases. This will be managed by ensuring construction work largely operates within the approved hours of construction.
- 3.170 Mitigation measures set out in the Construction and Environmental Management Plan, prepared by DBFL will be implemented, and attached to this report. Implementation of mitigation measures will be monitored.
- 3.171 It is likely that a minor impact from noise and vibration, dust and pollution during the construction phase will occur. Air and Climate are not likely to be significantly affected by the proposed development.
- 3.172 However, construction works in an urban environment are entirely normal and working hours will be limited generally to hours set by condition or as otherwise agreed. The frequency of vehicles accessing the site will vary throughout the construction phase.
- 3.173 The construction impacts will not be of such a quantity significance that would warrant the completion of a sub threshold EIAR. Impacts from construction traffic, noise, vibration and dust will be subject to mitigation measures as set out in the Construction and Environmental Management Plan prepared by DBFL. The impacts are considered to be short term, local and minor.
- 3.174 In terms of public health, it is considered that the construction and operation of the proposed development will not give rise to operational impacts that would be likely to cause significant effects in terms of population and human health
- Biodiversity, with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive;*
- 3.175 The subject site is not located within or directly adjacent to any SAC or SPA, and there are no direct hydrological connections existing linking the subject site and Boyne Estuary and associated designated sites.
- 3.176 The Ecological Impact Assessment Statement concludes ‘*Provided all recommended measures are implemented in full and remain effective through- out the lifetime of the Proposed Development, no significant negative residual impacts on the local ecology, or on any designated nature conservation sites, will occur as a result of the Proposed Works.*’
- (4) The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7.**
- 3.177 Schedule 7 of the regulations details the criteria for determining whether development listed in part 2 of Schedule 5 should be subject to an environmental impact assessment. The criteria under Schedule 7 is grouped under three broad headings as discussed below.



## 1. Characteristics of the Proposed Development

The characteristics of proposed development, in particular –	Response
(a) the size and design of the whole of the proposed development	<p>The proposed development consists of 201 no. residential units on a site area of 1.74 hectares. The gross floor area is 19,125 sqm.</p> <p>The 5 no. apartment blocks of 5 no. storeys in height provide an appropriate and compatible form of development within an urban area on lands close to high quality public transport which are currently zoned for residential purposes.</p> <p>The scale and height of the development is designed to make optimum use of the site's topography and size in order to mitigate visual impacts upon the surrounding area.</p> <p>The development is considered to be of appropriate density within the settlement boundary of Drogheda and provides a suitable location for infill development at a sustainable density on a site which benefits from strong accessibility and connectivity. The proposal will contribute to achieving compact growth in appropriate urban locations which are accessible to public transport.</p> <p>The proposal is considered to be compatible with its immediate adjoining land uses, which are predominantly retail and residential. The suitability of the site for residential development is established by its land use zoning for mixed residential and business uses.</p> <p>In zoning the land for these uses, the Planning Authority will have thoroughly assessed the nature of the site in order to ascertain its capacity to accommodate such development. The size and design of the proposed development is not likely to cause significant effects on the environment, with comprehensive landscaping and tree planting on site to ensure biodiversity is preserved and enhanced as far as possible.</p> <p>The development plan was subject to Strategic Environmental Assessment, which found that all the recommendations of the SEA and AA assessment have been integrated into the plan.</p>
(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	<p>The subject site is greenfield in nature, currently zoned for residential development. A review of the planning history and adjoining planning permissions reveal a number of other residential land uses on lands located between Dublin Road, Colp Road and the Dublin/Belfast railway line, Reg. Ref.: 99/989 and ABP Reg. Ref. PL17.119445, and Reg. Ref.: SA/40196 and ABP Reg. Ref.: PL17.212344.</p> <p>Based on assessment of cumulative impact there is no likely significant impact on the receiving environment</p>
(c) the nature of any associated demolition works	<p>No demolition is involved. The volume of excavation is of the order of 25,000 cubic metres for the purposes of building a basement. Mitigation measures proposed in the CEMP address both dust and noise.</p>

<p>(d) the use of natural resources in particular, land, soil, water and biodiversity</p>	<p>There will be no significant use of natural resources. The main use of natural resources will be land. The subject lands are greenfield lands which are zoned for residential use. The proposed development site extends to approximately 1.74 hectares, with the main source of waste anticipated to arise from excavation for groundworks at the site.</p> <p>Other resources used will be construction materials which will be typical raw materials used in construction of residential developments. The scale and quantity of the materials used will not be such that would cause concern in relation to significant effects on the environment.</p> <p>The construction or operation of the scheme would not use such a quantity of natural resources (soil, water rock) to cause concern in relation to significant effects on the environment.</p> <p>There will be a loss of habitat resulting from the removal of trees. However new habitat will be planted where possible within the associated landscaping scheme, with bat friendly lighting measures proposed as mitigation in relation to bats foraging/commuting over the site, in addition to mitigation for hedgehogs and birds.</p> <p>The use of natural resources in relation to the proposed development is not likely to cause significant effects on the environment.</p>
<p>(e) the production of waste</p>	<p>There will be waste materials produced in the construction of the proposed scheme. Waste will be disposed of in a responsible manner using licensed waste disposal facilities and contractors. The scale of the waste production in conjunction with the use of licensed waste disposal facilities and contractors does not cause concern for likely significant effects on the environment.</p> <p>The accompanying Construction and Demolition Waste Management Plan, prepared by Byrne Environmental Consulting Ltd, set out the measures used in the responsible disposal of waste arising from the construction of the development. The majority of waste generated at the construction phase will be excavated material, with surplus construction materials and cuts also anticipated.</p> <p>Other resources used will be construction materials which will be typical raw materials used in construction of residential developments. The scale and quantity of the materials used will not be such that would cause concern in relation to significant effects on the environment.</p> <p>The Operational Waste Management Plan also includes a strategy for the disposal of waste within the operational phase of the development. This is to maximise the quantity of waste recycled by providing sufficient waste recycling infrastructure, waste reduction initiatives and waste collection and waste management information to the residents of the development.</p> <p>All works carried out will be done so in accordance with the Site Specific Outline Construction and Environmental Management Plan prepared by DBFL and Construction Waste Management Plan, prepared by Byrne Environmental Consulting Ltd, submitted alongside this application.</p> <p>The works during construction or the operational phase are not of such a scale or extent that would be considered to be likely to cause significant effects on the environment in the geographic area or on any considerable quantum of the population in the vicinity.</p>

	<p>Having regard to the mitigation measures proposed, the production of waste will be limited in the proposed development and will not have a significant effects on the environment.</p>
<p>(f) pollution and nuisances</p>	<p>There will likely be potential for dust and noise and vibration produced during the demolition and construction phases. This will be managed by ensuring construction work largely operates within the approved hours of construction.</p> <p>Standard dust and noise prevention mitigation measures as described in the Construction and Environmental Management Plan prepared by DBFL will be employed and monitored. As such, pollution and nuisances are not considered likely to have the potential to cause significant effects on the environment. All works on the site will be completed in accordance with the content of the Construction and Environmental Management Plan prepared by DBFL.</p>
<p>(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</p>	<p>Standard construction practices will be employed throughout the construction phase. There are no technologies or substances to be used in the development which may cause concern for having likely significant effects on the environment. The subject lands are not proximate to any Seveso/COMAH designated sites.</p> <p>The ECFRAMS and ICPSS indicates that the subject site is within Flood Zone C. A comprehensive Site Specific Flood Risk Assessment has been carried out by DBFL and confirm the site lies within Flood Zone C</p> <p>The potential impact of climate change has been allowed for in the design of the surface water drainage network and storage system, with an allowance for a 10% increase in rainfall intensities, as recommended by the GSDSDS (Greater Dublin Strategic Drainage Study). All drainage infrastructure will be included within the red line boundary of the site and in accordance with the provision of SUDS.</p>
<p>(h) the risk to human health (for example due to water contamination or air pollution).</p>	<p>There is no impact on air pollution expected from the development outside of the potential dust impact during construction, and therefore the risk to human health is considered negligible in this regard.</p> <p>In terms of potential water contamination, there is no direct pathway to water receptors. Interceptors will prevent pollutants or sediments from discharging into stormwater drains and off site water courses.</p> <p>Standard mitigation measures will be employed in relation to all potential risks to human health arising during the construction phase as set out in the Construction and Environmental Management Plan prepared by DBFL.</p> <p>Wastewater will be connected to the existing foul sewer to the north of the site and therefore water contamination leading to a risk to human health will not occur.</p>

## 2. Location of Proposed Development

The environmental sensitivity of geographical areas likely to be affected by proposed development, with particular regard to:	Response
(a) the existing and approved land use;	<p>The existing use on the site is greenfield lands.</p> <p>The proposed use as a residential development is compatible with the land use zoning of the subject lands.</p>
(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground.	<p>As stated in the Ecological Impact Assessment, “<i>Provided all recommended measures are implemented in full and remain effective throughout the lifetime of the Proposed Development, no significant negative residual impacts on the local ecology, or on any designated nature conservation sites, will occur as a result of the Proposed Works.</i>” The AA Screening Report finds that it can be concluded that upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle the possibility may be excluded that the Proposed Development will have a significant effect on identified European sites.</p> <p>There will be no significant likely effects on the environment in relation to natural resources in the area. This has been addressed further above. The main use of natural resources will be land. The land is zoned for residential and the proposal is considered to be an efficient use of this greenfield land resource in an established residential area.</p> <p>The scale of natural resources used both in construction and operation is not such that it is likely to cause concern in terms of significant likely effects on the environment. Mitigation measures relative to bat habitats, hedgehogs, birds, fauna will be implemented in accordance with the accompanying Ecological Impact Assessment report, Arboricultural Report, Landscaping Report &amp; Drawings, and Bat Impact Assessment Report submitted alongside this request.</p> <p>There will be no significant loss of soil, land, water or biodiversity.</p>
(c) the absorption capacity of the natural environment, paying particular attention to the following areas:	
(i) Wetlands, riparian areas and river mouths;	<p>As confirmed in the EclA, the Site of the Proposed Development does not support springs or flowing watercourses nor were any drainage ditches observed beneath the boundary treelines/hedgerows. The SSFRA confirms the site is located in Flood Zone C.</p>
(ii) Coastal Zones and the marine environment;	<p>The AA Screening Report confirms the subject site is not directly connected with or necessary to the management of European sites and there are no European sites located either within or immediately adjacent to the proposed development lands.</p>

(iii) Mountain and forest areas;	The proposed development is not within or directly connected to any mountain or forest areas. There is no known pathway between the site and mountain or forest areas.
(iv) Nature reserves and parks;	The proposed development is not within or directly connected to any nature reserves or parks. There is no known pathway between the site and nature reserves or parks.
(v) Areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive;	The proposed development is not located within or directly adjacent to any SAC or SPA. The AA Screening Report finds that it can be concluded that upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle the possibility may be excluded that the Proposed Development will have a significant effect on identified European 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;	The site is not known to be located within or connected to such an area.
(vii) Densely populated areas; and	<p>The proposed development is located on zoned lands within an existing built up area, with a primary established residential land use.</p> <p>The proposed land use is compatible with the zoning objectives and existing development and uses in the vicinity. The absorption capacity is not considered to be significantly affected.</p>
(viii) Landscapes and sites of historical, cultural or archaeological significance.	An Archaeology and Cultural Heritage Report has been prepared, and a Landscape and Visual Impact Assessment with accompanying photomontages. These demonstrate that the site can accommodate the proposed development without significant adverse effects.
<b>Conclusion</b>	It is considered that the natural and built environment in this area has the capacity to absorb the proposed residential development.

### 3. Type and Characteristics of Potential Impacts

<p><b>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—</b></p>	<p><b>Response</b></p>
<p>(a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);</p>	<p>The site size is c 1.74 ha. The site is located on a greenfield site in a suburban location with an established residential land use.</p> <p>The works during the construction phase may have a minor impact on the immediate area, however, works will be carried out in accordance with the Construction and Environmental Management Plan to ensure impacts are minimised.</p> <p>The works during construction or the operational phase are not of such a scale or extent that would be considered to be likely to cause significant effects on the relevant aspects of environment (specified in paragraph (b)(i)(I) to (V) of the definition of ‘environmental impact assessment report’ in section 171A of the Act) with particular reference to the impacts on human health and the population in the vicinity.</p>
<p>(b) the nature of the impact;</p>	<p>The construction impacts have potential to cause nuisance associated with noise, dust and traffic. The Construction and Environmental Management Plan will put in place measures to avoid, reduce or mitigate impacts.</p> <p>With mitigation measures in place any impacts are likely to be short term, minor and local.</p> <p>The operational phase will result in the development of permanent residential accommodation, compatible with the established predominant land use in the area.</p> <p>The proposed development will give rise to a small increase in traffic during operational phase. This will be a minor adverse, local, long term impact.</p>
<p>(c) the transboundary nature of the impact;</p>	<p>There are no construction phase or operational phase transboundary impacts.</p> <p>Any minor impacts will be contained in the immediate vicinity of the site. The subject lands are not located on any geographical or other boundary of relevance to assessment of likely significant effects on the relevant aspects of the environment.</p>
<p>(d) the intensity and complexity of the impact;</p>	<p>The intensity and complexity of the construction phase is in keeping with modern construction projects.</p> <p>Following mitigation, it is likely that the impacts of the construction phase will be minor.</p> <p>The operational phase of the development is moderate in scale and no significant negative impacts are likely.</p>

(e) the probability of the impact;	<p>It is likely that minor impact will arise from noise and during the construction phase will occur. However, construction activity in an urban environment is entirely normal and working hours will be limited generally to hours set by condition or as otherwise agreed.</p> <p>All works carried out will be done so in accordance with approved management plans.</p> <p>In summary, some level of construction impacts on the relevant aspects of the environment is highly probable, but these will be mitigated by the implemented Construction and Environmental Management Plan.</p>
(f) the expected onset, duration, frequency and reversibility of the impact;	<p>The construction impacts will commence within approximately 6 months of planning approval; they will be short-medium term, over a period of c. 2 years and restricted by planning conditions in terms of the hours of operation.</p> <p>The frequency of the minor impacts will vary throughout the construction phase; however, the impact is considered to be short term, local and minor.</p> <p>No permanent negative impacts on the relevant aspects of the environment are anticipated as a result of the construction phase of the project. No significant negative impacts are likely.</p> <p>The development will be occupied all year round and impacts will be irreversible.</p>
(g) the cumulation of the impact with the impact of other existing and/or approved projects;	<p>The subject site is zoned land designated for the proposed use and is surrounded by zoned lands. The development of lands in the area is to be expected, in the context of the Development Plan.</p> <p>It is considered that cumulative impacts with other existing and/or approved projects are not likely to cause significant effects on the relevant aspects of the environment.</p>
(h) the possibility of effectively reducing the impact.	<p>Appropriate mitigation measures will be undertaken in order to reduce likely significant effects on the environment arising from the proposed development.</p> <p>Any mitigation measures to manage noise, dust and/or pollution during the construction phase will be implemented in accordance with the site specific construction management plan submitted with the application.</p>

## SUMMARY & CONCLUSIONS

- 4.1 This Environmental Impact Assessment Screening Report has been prepared to accompany the Strategic Housing Development application to An Bord Pleanála for the development of 201 no. unit residential development on lands at Southgate North, Dublin Road, Drogheda, Co Meath. The application site is located on lands to the immediate north of the Southgate Shopping Centre.
- 4.2 The purpose of this report is to provide to An Bórd Pleanála with the information required under Schedule 7A of the Planning and Development Regulations 2001, as amended, to enable The Board to determine in light of the criteria set out under Schedule 7 of those regulations whether the proposed development is likely to have significant effects on the environment. If it determines that the proposed development is not likely to have significant effects on the environment, the application can be determined without an Environmental Impact Assessment Report (EIAR) having been submitted.
- 4.3 The proposed development is substantially below the thresholds of a mandatory EIAR. The screening exercise has been completed in this report and the methodology used has been informed by the available guidance, legislation and directives.
- 4.4 It is considered that a sub threshold EIAR is not required for the proposed residential development for the following reasons (in summary) set out in this screening exercise:
- The proposal falls significantly below the thresholds of Schedule 5 of the Planning and Development Regulations 2001 (as amended);
  - The site makes optimum use of a suburban greenfield land resource, suitably zoned for development and in close proximity to existing residential development and utilises existing servicing provision.
  - The Ecological Impact Assessment and AA screening outlines that adverse effects on the integrity of the European Sites from the proposed development, whether considered on its own or in combination with other plans or projects can be excluded. No measures intended to avoid or reduce the potential harmful effects of the project on a European Site have been taken into account in the Appropriate Assessment Screening Report and its conclusions.
  - The development will be connected to public services such as water, foul and storm sewers. There will be no direct discharge to ground or surface water as a result of the proposed development.
  - The proposed development is on lands suitable for residential development (Flood Zone C). The proposed drainage and flood risk strategy is in compliance with SuDs guidance and will not result in any off site flooding.
  - Standard construction practices as described in the Construction and Environmental Management Plan prepared by DBFL Consulting Engineers can be employed to mitigate any risk of adverse impacts during the construction phase arising from noise, dust or pollution. Post construction, there are minimal effects on the environment

- No identified impact in this screening exercise, cumulatively or individually is considered to likely cause significant effects on the environment.

4.5 This report and the accompanying documentation outlined above provides the information required by the Board, as referred to in Reg. 299C(1)(a)(iii) and 299B(1)(b)(ii)(II), and the conclusion is that there is no likelihood of significant effects on the environment arising from the proposed development.

4.6 To inform article 299C(1)(a)(iv), an Information for Screening for Appropriate Assessment report prepared by Enviroguide accompanies this application. The report concludes:

*“The Proposed Strategic Housing Development at Southgate, Drogheda Co Meath has been assessed and taking into account:*

- *the nature, size and location of the proposed works and possible impacts arising from the construction works*
- *the qualifying interests and conservation objectives of the European sites located within the 15km Zone of Impact*
- *the potential for in-combination effects arising from other plans and projects.*

*In conclusion, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is considered by the authors of this report that, the possibility may be excluded that the Proposed Development will have a significant effect on any of the European sites listed below:*

- *Clogher Head SAC;*
- *River Nanny Estuary and Shore SPA; and*
- *River Boyne and River Blackwater SPA*
- *Boyne Coast and Estuary cSAC,*
- *River Boyne & River Blackwater cSAC; and*
- *Boyne Estuary SPA*

*These complete precise and definitive findings based on the best available scientific evidence, remove all reasonable scientific doubt that the proposed Development will have any likely significant impacts on the European Sites detailed above. In addition, no measures intended to avoid or reduce the potential harmful effects of the project on a European Site have been taken into account in this Appropriate Assessment Screening Report and its conclusions.*

*Accordingly, a Stage 2 Appropriate Assessment is not required to be carried out in relation to the Proposed Development.”*

4.7 In the event that the screening determination carried out by the Board reaches the conclusion that the proposed development is not likely to have significant effects on the environment, the Board’s attention is specifically drawn to the requirement that the Board’s screening determination must comply with the requirements of Article 299C(2) of the Planning and Development Regulations, as amended, which provides:

*“(2) (a) Paragraph (b) applies where the screening determination is that the proposed development would not be likely to have significant effects on the environment and the applicant has provided, under article 299B(1)(c), a description of the features, if any, of the proposed development and the measures, if any, envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment of the development.*

*(b) The Board shall specify such features, if any, and such measures<sup>6</sup>, if any, in the screening determination.”*

- 4.8 In conclusion, it is considered that the proposed development, subject to design, construction and operational mitigation measures, will not have any significant impacts on the environment. All recommended mitigation measures and standard practices will be employed throughout the construction and operation phase of the development to ensure that the proposed development will not create any significant impacts on the quality of the surrounding environment.

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<sup>6</sup> Commonly referred to as mitigation measures.