



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

**ADDITIONAL HOUSING
CARA PARK, DUBLIN 17**

DESIGN STATEMENT



COTTER



NAESSENS
ARCHITECTS

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P01	30.08.24			LC	DN	LC
P02	04.02.25	7	Part VIII refers	LC	DN	LC
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CARA PARK, DUBLIN 17 NEW BUILD HOUSING

DESIGN STATEMENT

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1 EXECUTIVE SUMMARY

This Design Statement outlines the design strategy for the project for the purpose of Part VIII approval.

Cara Park is an established Traveller housing estate. It has been built in several stages up until the year 2000. Currently, there are 41no. homes, comprised of a mixture of 2, 3 & 4-bedrooms bungalows. As with other neighbourhoods in Dublin there is a need for additional housing.

There is a community centre and a training centre on the estate; both of which have not been operational for approximately 15 years since the FSA ceased funding for traveller programmes. The services, which were operational at the time, moved under different service providers locally such as Youth Reach, local CE schemes and Northside Partnership.

Within this community, family connections are valued and of the highest priority. Where possible, Dublin City Council strives to house new families as close to where their families of origin are located. As such it is desirable to facilitate the growth of this community within the estate or immediate environs in-so-far as it is possible.

As the community centre and training facility have both fallen into dis-use and their functions are now provided locally by other services, their demolition and removal provides scope to build new housing in their place, addressing the continuing pressure for additional housing in the area.

2 INTRODUCTION

2.1 Project Overview

The Stage 2 design process to date has consisted of a number of exercises:

- Implement the agreed brief
- Incorporate client comments
- Attend stakeholder consultation meeting with Travact group, Cara Park residents and Traveller Accommodation Unit
- Develop the technical design parameters including sustainability strategies
- Risk management
- Programming

2.2 Project Elements

The project comprises 3 distinct sites, two of which include existing buildings to be demolished.

3 DESIGN DEVELOPMENT

3.1 DESIGN STANDARDS

Cotter & Naessens, leading a multidisciplinary design team, were appointed in 2022 to design a 9 unit housing development in Cara Park. The brief (Vol 4b Project Brief) was issued at tender stage and outlined the objectives of the design brief as follows:

- Socially and environmentally appropriate
- Architecturally appropriate
- Safe, secure and healthy
- Accessible and adaptable
- Affordable
- Durable
- Resource efficient
- Broader benefits-improving the perception of the estate as a safe and positive place.

The relevant applicable design guidance documents were noted as follows:

- Dublin City Development Plan
- DHLGH Sustainable Residential development in Urban Areas 2009
- DHLGH Group Housing for Travellers December 2020
- DHLGH Best Practice Urban Design Manuals 2009 (Parts 1 and 2)
- DHLGH Quality Housing for Sustainable Communities 2007
- Design Manual for Urban Roads and Streets
- Acceptable Construction Details Part L 2011
- All relevant SEAI Guidance Documents in reference to energy performance and sustainability
- Safety Health and Welfare at Work Acts and Regulations
- Capital Works Management Framework guidelines
- Universal Design Guidelines for Homes in Ireland (NDA)
- Best Practice Access Guidelines-Designing Accessible Environments (Irish Wheelchair Association)



3.2 DESIGN PROCESS

Cara Park is like an island community set at the outer edges of the metropolis, surrounded by roads. The task at hand is how to optimise the development of the infill sites available, in such a way that coherent outdoor spaces are provided that have a clear function, character and shape. Our design approach is underpinned by the design principles outlined in Quality Housing for Sustainable Communities that includes the creation of legible places, permeable circulation, secure and sociable external spaces.

The brief states that open space should have a clear function, character and shape. All dwellings will have a clearly defined private band of garden space at ground floor level. We recognize the importance of this threshold space, which is important socially as it is here where people meet and greet their neighbours within the confines of their own territory. It is important functionally as a place to keep vehicles, which are mobile extensions of family space.

The first presentation of design proposals was issued on 10.05.22 with a presentation to the Travact Group taking place on 14.07.22.

Whereas the original brief stated that all houses needed to be single storey, a culturally specific preference", it was clear that 2 storey models had to be considered due to the limited site sizes.

The design development illustrated in the proposals presented over 4 months was concerned with finetuning the house types and accommodation and provision of adequate open space.

The requirement to accommodate parking for a touring campervan as well as a car for the houses in Site A has been adopted on the current site layout.

A consultation meeting was held on 17.08.23 with the Travact Group, Cara Park residents, Traveller Accommodation Unit and Louise Cotter, Cotter & Naessens. The design proposals were presented to the group. The design was received very positively and the residents did not request changes confirming that they were happy for the proposals to proceed as quickly as possible.

3.3 TYPOLOGY

The design of the two storey house is based on the villa model where a pair of semi-detached houses has a distinct and symmetrical form, the hipped roof forming a "hat" on the solid rendered form. Window openings are discrete and arranged on string courses. The side entrances ensure that the living space is maximised with views to the front garden. All houses have side access to the rear gardens. Because of the requirement to accommodate a touring camper van and the minimum separation distances, one of the houses has reduced private open area.

Site B includes one house, similar to one in Site A.

Site C includes a pair of semi-detached single storey houses, each with a side entrance and sufficient area for a car parking space.

Summary of Accommodation

Site A 6 no. 3 bedroom houses (6 person)

Site B 1 no. 3 bedroom house (6 person)

Site C 2 no. 2 bedroom houses (3 person)

3.4 PERFORMANCE AND MATERIALS

As the residential units will be managed by Dublin City Council, the maintenance requirements of the building envelope and services will be a critical design parameter. The procurement strategy, currently outlined as employer designed will also inform design choices. Regardless of the procurement route a clear and rational design intent without unduly complex detailing that can be implemented easily on site will be established. Design lifespan and low maintenance requirements will inform design choices and favour high quality natural materials that will wear and weather well with minimal maintenance. The selection of materials that do not require applied finishes to be periodically maintained and components with long lifespan will reduce running costs and the negative environmental impact associated with frequent repair, upgrades and waste disposal.

The material and systems selection regime will be complemented by robust detailing that underpins the weathering, energy efficiency and longevity of finishes and components. Consideration of construction trade interfaces and sequence of work on site informs the details and whilst a simple materials palette has aesthetic, ergonomic and cost benefits, clear and rigorous detail will pay dividends for ease of use.

Durability and ease of accessibility, and availability of replacement parts are key parameters in the design and specification of mechanical and electrical services. Working with Varming, we will ensure efficient allocation of services routes with good access and careful specification incorporating requirements for minimum design life and outlines of repair and replacement strategies. An assessment has been made of space requirements for mechanical and electrical equipment and incorporated in the house plans.

The issue of design life and life span is fundamentally bound with sustainability. In summary the design process will achieve design for durability and long design life by means of appropriate selection of materials, detailed specifications to include criteria for durability, life span and maintenance regime, integrated assessment of whole life cycle costing at key design stages and robust detailing.

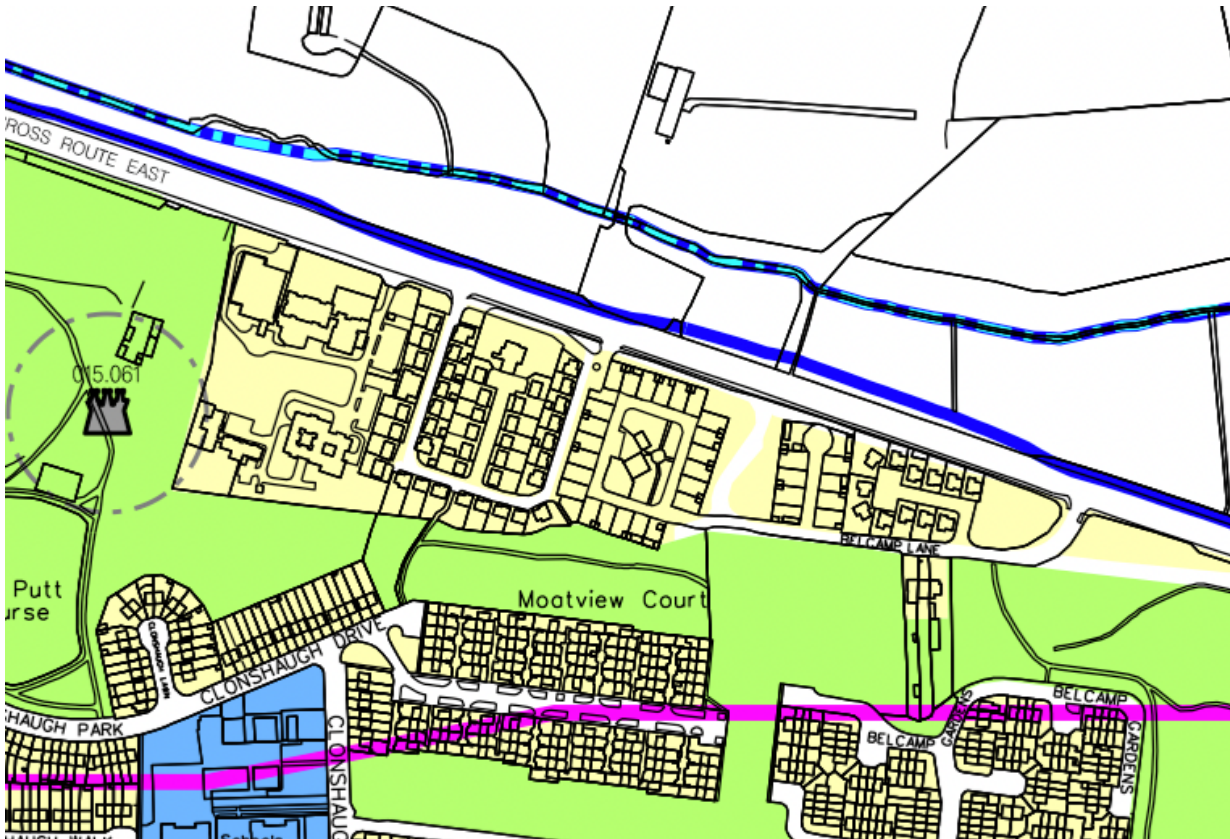
The residential units will be designed on environmental principles, optimising orientation and glazing for daylight and controlled passive solar gain. The main objective in the design of NZEB dwellings is to provide a designed ventilation system, a high degree of airtightness and minimal thermal bridging and high thermal performance, cost effectively. We appreciate that investment in good building design and fabric specification often has a better life-time advantage when compared with high technology mechanical and electrical systems. Our design will therefore be driven by preferential investment in reducing the building's inherent baseline energy demand in the first instance. The environmental design will be developed by Varming with Cotter & Naessens to ensure that the building form and specifications maximise the potential for passive environmental control and high efficiency plant/systems in order to minimise the operating costs of the development.

An outline specification of materials includes

Roof	Grey Fibre cement slates
Gutters and downpipes	Polyester powder coated aluminium
Walls	Roughcast sand cement render over a low plinth of blue engineering bricks
Windows	Polyester powder coated aluminium/painted softwood metalclad combi system
Doors	Front doors are painted softwood external grade doors Garden doors are ppc aluminium/painted softwood metalclad combi system
Paving	Permeable paving, concrete paviours to civil engineers detail

4 PLANNING BACKGROUND

The sites are located in Cara Park, an established residential neighbourhood, bounded by the Northern Cross Route to the north and open green space to the east, south and west. The area is zoned Z1 Sustainable Residential Neighbourhoods. It is intended to progress the project through the planning process in accordance with Part VIII of the Planning and Development Regulations 2001-2015. The project has been screened for appropriate assessment. An environmental consultant was appointed to undertake the necessary screening (enclosed in Appendix).



Zoning Map Dublin City Development Plan 2022-2028

The community centre and the training centre ceased being operational approximately 15 years ago when the then funder FAS ceased to fund traveller programmes. The services which were operational at the time moved under different umbrellas and service providers locally such as Youth Reach, local CE Schemes, Northside Partnership. These services are still operational under these service providers.

Permission was granted on 11.05.12 to demolish the Training Centre on Site C (ref 2176/12).

APPENDIX

CUNNANE STRATTON REYNOLDS

Appropriate Assessment Screening Report


**Prepared by
Cunnane Stratton Reynolds**

**For a Part 8 planning application for
9 no. residential units and associated site works**

**At
Cara Park, Belcamp Lane, Coolock, Dublin 17.**

Document Control Sheet

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Disclaimer: The advice in this report has been informed by a search of the available online planning history and development plan zoning objectives for the site in question, and excludes consideration of other existing or potential, perceived or actual issues including but not exclusively relating to wayleaves, other rights of way, ownership, availability or otherwise of access, flood risk, infrastructural constraints, and of other advices produced in relation to the site by other parties. Our advice has been prepared without consultation with any other party including the local authority in whose jurisdiction the site is located. We reserve the right to amend the advice contained in the report based upon the availability of further information as and when it may become available. The site boundary indicated in Figures 1 is indicative only.

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1 INTRODUCTION

This AA Screening Assessment was undertaken by Cunnane Stratton Reynolds Ltd on behalf of Dublin City Council in respect of a Part 8 planning application as per Section 177U of the Planning and Development Act 2000 (as amended). The location of the application site is shown in Figure 1 below.

The aim of the Appropriate Assessment Screening is to assess the potential for connectivity between the Proposed Development and any Natura 2000 site within a 15km radius of the application site. Assessing the potential for connectivity will determine the likelihood of significant impacts upon qualifying features of the surrounding Natura 2000 sites within 15km of the Proposed Development. Within 15km of the site, there are 10 Special Areas of Conservation (SAC) to include: North Dublin Bay SAC, Malahide Estuary SAC, Baldoyle Bay SAC, Ireland's Eye SAC, Lambay Island SAC, Rogerstown Estuary SAC, Rockabill to Dalkey Island SAC, Howth Head SAC, North Dublin Bay SAC, South Dublin SAC and 8 Special protection Areas (SPA), Malahide Estuary SPA and Baldoyle Bay SPA, Ireland's Eye SPA, Howth Head Coast SPA, North Bull Island SPA, Lambay Island SPA, Rogerstown Estuary SPA and South Dublin Bay and River Tolka Estuary SPA .

The site is not located within any Designated Site nor adjoining one. No direct ecological connection or pathway exists between the application site and the aforementioned designated Special Areas of Conservation nor the Special Protection Areas.

This Appropriate Assessment Screening has concluded that the Proposed Development is not likely to have a significant effect on any Natura 2000 Designated Site. Therefore, the next stage of the Appropriate Assessment (Natura Impact Statement) is not required.

Figure 1: Location of the proposed development.



1.1 Legislative Context for Appropriate Assessment

The Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora, the “The Habitats Directive”, provides legal protection for habitats and species of European importance. Articles 3 to 9 provide the legislative means to protect habitats and species of Community interest through the establishment and conservation of an EU-wide network of sites known as ‘Natura 2000’.

The Habitats Directive has been transposed into Irish law by Part XAB of the Planning and Development Act (as amended) and the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 477/2011) as amended. In the context of the proposed development, the governing legislation is the Birds and Habitats Regulations. This Screening has been prepared on behalf of Cotter & Naessens Architects for Dublin City Council as the Competent Authority responsible for undertaking the Screening for AA for this proposed development. Article 6(3) of the Habitats Directive set out the decision-making tests for plans and projects likely to adversely affect the integrity of European sites (Annex 1.1). Article 6(3) establishes the requirement for AA:

“Any plan or project not directly connected with or necessary to the management of the [Natura 2000] site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subjected to appropriate assessment of its implications for the site in view of the site’s conservation objectives. In light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”

Natura 2000 sites are defined under the Habitats Directive (Article 3) as a coherent European ecological network of special areas of conservation, composed of sites hosting the natural habitat types listed in Annex I and habitats of the species listed in Annex II, shall enable the natural habitat types and the species' habitats concerned to be maintained or, where appropriate, restored at a favourable conservation status in their natural range. In Ireland, these sites are designated as European sites and include Special Protection Areas (SPAs), established under the EU Birds Directive (79/409/EEC, as codified by 2009/147/EC) for birds and Special Areas of Conservation (SACs), established under the Habitats Directive 92/43/EEC for habitats and species.

The competent authority, Dublin City Council, is obliged to consider, in view of best scientific knowledge, whether the proposed works are likely to have a significant effect either individually or in combination with other plans and projects. If screening determines that there is likely to be significant effects on a European site, then AA must be carried out for the proposed development project, including the compilation of a Natura Impact Statement (NIS) to inform the decision making.

1.2 Statement of Competence

This AA Screening was undertaken by Eamonn Prenter MIPI MRTPI, chartered town planner, with over 30-year post qualification experience, of which approximately 20 years have been spent on producing and managing AA Screening processes for projects and plans as described in *EC (2021) Assessment of plans and projects in relation to Natura 2000 sites – Methodological Guidance on Article 6(3) and (4) of the Habitats directive 92/43/EEC.* Such screening has been undertaken for a range of statutory and non-statutory development plans and over a range of projects including mixed use, residential, commercial leisure and recreation. His qualifications include Dip. Town Planning and MSc in Town Planning. Eamonn has visited the site and surrounding area.

2 METHODOLOGY

2.1 Study Zone Identification

The 'Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities' states that the AA Screening should include the following:

- "Any Natura 2000 sites within or adjacent to the plan or project area;
- Any Natura 2000 sites within the likely zone of impact of the plan or project;
- A distance of 15km [...] currently recommended in the case of plans, and derives

For projects, the distance could be much less than 15km, and in some cases less than 100m, but this must be evaluated on a case-by-case basis with reference to the nature, size and location of the project, and the sensitivities of the ecological receptors, and the potential for in combination effects; and

- Natura 2000 sites that are more than 15km from the plan or project area depending on the likely impacts of the plan or project, and the sensitivities of the ecological receptors, bearing in mind the precautionary principle. 4.3. It is considered that the ZOI in connection with the Natura 2000 designated sites and their qualifying features will extend to a 15km radius of the Proposed Development.

2.2 Desk Study

Sources of material that were consulted as part of the desk study for the purposes of the assessment are as follows:

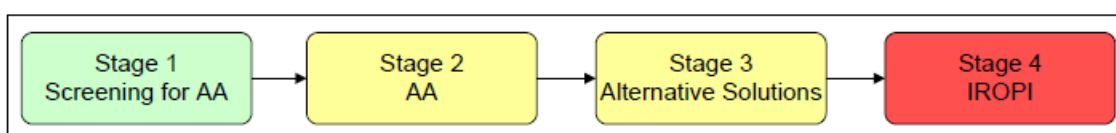
- NPWS natural heritage database for Natura 2000 sites within the 15km ZOI of the Application Site;
- NPWS site synopses, Natura 2000 Data Form and conservation objectives relating to each site and aerial images; and
- Environmental Protection Agency (EPA) maps of river catchments, sub catchments and flow directions.

2.3 Stages of Appropriate Assessment

The Department of the Environment, Heritage and Local Government guidelines (DELHG, 2009, rev. 2010) outlines the European Commission's methodological guidance (EC, 2002) promoting a four-stage process to complete the AA and outlines the issues and tests at each stage. An important aspect of the process is that the outcome at each successive stage determines whether a further stage in the process is required.

The four stages are summarised diagrammatically in Figure 2 below. Stages 1-2 deal with the main requirements for assessment under Article 6(3), and Regulation 42 of the Birds and Habitats Regulations. Stage 3 may be part of the Article 6(3) Assessment or may be a necessary precursor to Stage 4. Stage 4 is the main derogation step of Article 6(4).

Figure 2: Four stages of Appropriate Assessment



Stage 1 - Screening is the process that addresses and records the reasoning and conclusions in relation to the first two tests of Article 6(3):

- i. whether a plan or project (in this instance the proposed project) is directly connected to or

- necessary for the management of the European sites, and
- ii. whether a plan or project, alone or in combination with other plans and projects, is likely to have significant effects on the European sites in view of their conservation objectives.

If the effects are deemed to be significant, potentially significant, or uncertain, or if the screening process becomes overly complicated, then the process must proceed to Stage 2 (AA). This report fulfils the information necessary to enable the competent authority to screen the proposal for the requirement to prepare an AA.

This report forms Stage 1 of the AA process as follows:

- Description of the proposed works;
- Characteristics of the proximal European sites; and
- Assessment of significance of the proposed works on the European sites in question.

The methodology followed in relation to this assessment has had regard to the following guidance and legislation:

- European Union Habitats Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora 92/43/EEC;
- Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (DOEHLG 2009, rev 2010);
- The Planning and Development Act (as amended);
- Managing Natura 2000 Sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC, Office for Official Publications of the European Communities, Luxembourg (EC, 2018);
- European Commission Notice Brussels C (2021) 6913 final 'Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC' (EC, 2021);
- Interpretation Manual of European Union Habitats. Version EUR 28. European Commission 2013;
- The European Union (Environmental Impact Assessment and Habitats) Regulations 2011; and
- The European Communities (Birds and Natural Habitats) Regulations, S.I. No. 477 of 2011 (as amended).

2.4 Information consulted for this report

The Screening assessment had regard to the following sources of data and information:

- Information on the location, nature and design of the proposed project;
- Department of Housing, Planning, and Local Government – online land use mapping www.myplan.ie/en/index.html;
- Department of Housing, Planning, and Local Government- EIA Portal <https://www.housing.gov.ie/planning/environmental-assessment/environmental-impact-assessmenteia/eia-portal>
- Environmental Protection Agency (EPA) – Water Quality www.epa.ie, <http://gis.epa.ie/Envision>;
- Geological Survey of Ireland – Geology, soils and Hydrogeology www.gsi.ie;
- Water Framework Directive website – www.catchments.ie;
- Inland Fisheries Ireland website and www.wfdfish.ie;
- National Parks and Wildlife Service – online European site network information, including site conservation objectives www.npws.ie;
- National Parks and Wildlife Service – Information on the status of EU protected habitats in Ireland (NPWS 2019);

- National Biodiversity Data Centre – www.biodiversityireland.ie;
- Ordnance Survey of Ireland – Mapping and Aerial photography www.osi.ie.

2.5 Screening Protocol

The following must be undertaken when conducting AA Screening:

- Ascertain whether the plan or project is necessary for the management of the European site;
- Description of the plan or project;
- Definition of the likely zone of influence for the proposed development;
- Identification of the European sites that are situated (in their entirety or partially or downstream) within the zone of influence of the proposed works;
- Identification of the most up-to-date Qualifying Interests (QI) and Scientific Information (SCIs) for each European site within the zone of influence;
- Identification of the environmental conditions that maintain the QIs/SCIs at the desired target of Favourable Conservation Status;
- Identification of the threats/impacts – actual or potential that could negatively impact the environmental conditions of the QIs/SCIs within the European sites;
- Highlighting the activities of the proposed works that could give rise to significant negative impacts; and
- Identification of other plans or projects, for which in-combination impacts would likely have significant effects.

2.5.1 Screening Determination

In accordance with Regulation 42(7) of the Birds and Natural Habitats Regulations 2011 (S.I. No. 477/2011) as amended, the competent authority, shall:

“determine that an Appropriate Assessment of a plan or project is not required where the plan or project is not directly connected with or necessary to the management of the site as a European site and if it can be excluded on the basis of objective scientific information following screening under this Regulation, that the plan or project, individually or in combination with other plans or projects, will have a significant effect on a European site.”

Further, under Regulation 42(8) (a):

“Where, in relation to a plan or project for which an application for consent has been received, a public authority makes a determination that an Appropriate Assessment is required, the public authority shall give notice of the determination, including reasons for the determination of the public authority, to the following—

the applicant,

if appropriate, any person who made submissions or observations in relation to the application to the public authority, or

if appropriate, any party to an appeal or referral.

(b) Where a public authority has determined that an Appropriate Assessment is required in respect of a proposed development it may direct in the notice issued under subparagraph (a) that a Natura Impact Statement is required.”

2.5.2 Zone of Influence

EC (2021) Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC requires identification of the European sites

that may be affected and this should be done by taking into consideration all aspects of the plan or project that could have potential effects on any European sites located within the zone of influence of the plan or project. This must take into account all of the designating features (species, habitat types) that are significantly present on the sites and their conservation objectives.

Assessment should identify in particular the following:

- Any European sites geographically overlapping with any of the actions or aspects of the plan or project in any of its phases, or adjacent to them;
- Any European sites within the likely zone of influence of the plan or project. Natura 2000 sites located in the surroundings of the plan or project (or at some distance) that could still be indirectly affected by aspects of the project, including as regards the use of natural resources (e.g. water) and various types of waste, discharge or emissions of substances or energy;
- European sites in the surroundings of the plan or project (or at some distance) which host fauna that can move to the project area and then suffer mortality or other impacts (e.g. loss of feeding areas, reduction of home range);
- European sites whose connectivity or ecological continuity can be affected by the plan or project.
- The range of European sites to be assessed, i.e. the zone in which impacts from the plan or project may arise, will depend on the nature of the plan or project and the distance at which effects may occur.

2.5.3 Likely Significant Effects

The threshold for a likely significant effect is treated in the screening exercise as being above a *de minimis* level. The opinion of the Advocate General in CJEU case C-258/11 has indicated that:

“the requirement that the effect in question be ‘significant’ exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable effect on a European site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill.”

In the context of this report ‘relevant’ European sites are those within the potential zone of influence of the construction and / or operation of the proposed development, and to which likely significant effect pathways were identified through the source-pathway-receptor model.

3 PROJECT DESCRIPTION

3.1 Development Description

The subject development comprises 9 no. residential units to supplement the existing group housing scheme. There are effectively 3 plots within the application site, namely Plot A, Plot B and Plot C.

Within Plot A it is proposed to demolish the existing dilapidated single storey community building, of irregular shape, and to provide 6 no. two storey semi detached units each comprising 3 no. bedroom. Plot A currently comprises a dilapidated structure and a number of temporary caravans. The proposal at this location will provide 6 no. permanent homes where there are currently several mobile homes.

Plot B currently comprises a single mobile home and the application seeks to replace this with 1 no. two storey, three bedroom unit.

Plot C comprises a former training facility which will be demolished and replaced with 2 no. single storey semi detached 2 bedroom bungalows, reflective of the character and appearance of a number of existing such bungalows in this estate.

For each residential unit proposed there is front and rear garden and in the case of proposed units within plots A and B, also allocated space for a 4 no. person, 2 no. bed touring caravan. Each unit is well appointed and reasonably scaled and appropriate in its setting.

The site is a developed site where development of a similar nature to that now proposed was granted planning permission. In planning terms the site would be termed as 'developed', where in terms of planning best practice there would be a presumption in favour of development and would constitute infill development essentially being an extension or infill of surrounding suburban development. The site is considered of very low ecological value due to a very low level of flora, greenery or open space. There is a public park to the rear where it is not anticipated any significant impact will be experienced either during the construction or operational phase of development.

There are no watercourses or active drainage ditches within the footprint of the proposed site and therefore no pathways to any Designated Sites. A sustainable drainage solution is proposed on site comprising permeable pavement areas improving the existing sites predominantly non-porous impermeable surface.

The application is accompanied by a Design and Access Statement which highlights that the application site is suitably zoned for the proposed development. The application is also accompanied by an Outline Construction Management Plan and Outline Resource and Demolition Waste Plan which has a particular focus on traffic management, air quality and noise and vibration control during the construction phase. A Flood Risk Assessment has also been undertaken and establishes that the site is not prone to flooding.

3.2 Description of European Sites

This stage of the screening for AA process describes European sites within the likely zone of influence of the works. The methodology for establishing the likely zone of influence is described in Section 2.5.2.

Connectivity between the proposed works and European sites has been reviewed. Connectivity is identified via the potential source-pathway-receptor model which identifies the potential impact pathways such as land, air, hydrological, hydrogeological pathways etc. which may support direct or indirect connectivity of the proposed works to European sites and/or their qualifying features.

In view of the characteristics of the proposed project (see Section 3) and the source, pathway and receptors of potential impacts, a 10km radius has been considered as appropriate in this instance as that is the distance to the furthest Designated Site. This is considered an appropriate zone of influence to screen all likely significant effects that might impact upon the European sites in question in this instance. The establishment of the likely zone of influence is in line with EC (2021) *Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC*.

There are 10 European sites located within 10km of the proposed development are outlined in Table 2 and Figure 3.

1. Baldoyle Bay SPA 004016
2. Baldoyle Bay SAC 000199
3. Howth Head SAC 000202
4. Howth Head Coast SPA 004113
5. North Bull Island SPA 004006
6. North Dublin Bay SAC 000206
7. Ireland's Eye SAC 004117
8. Ireland's Eye SPA 004117

9. South Dublin Bay SAC 000210
10. South Dublin Bay SPA 004024

Further details of these are set out below.

4 SCREENING ASSESSMENT CRITERIA

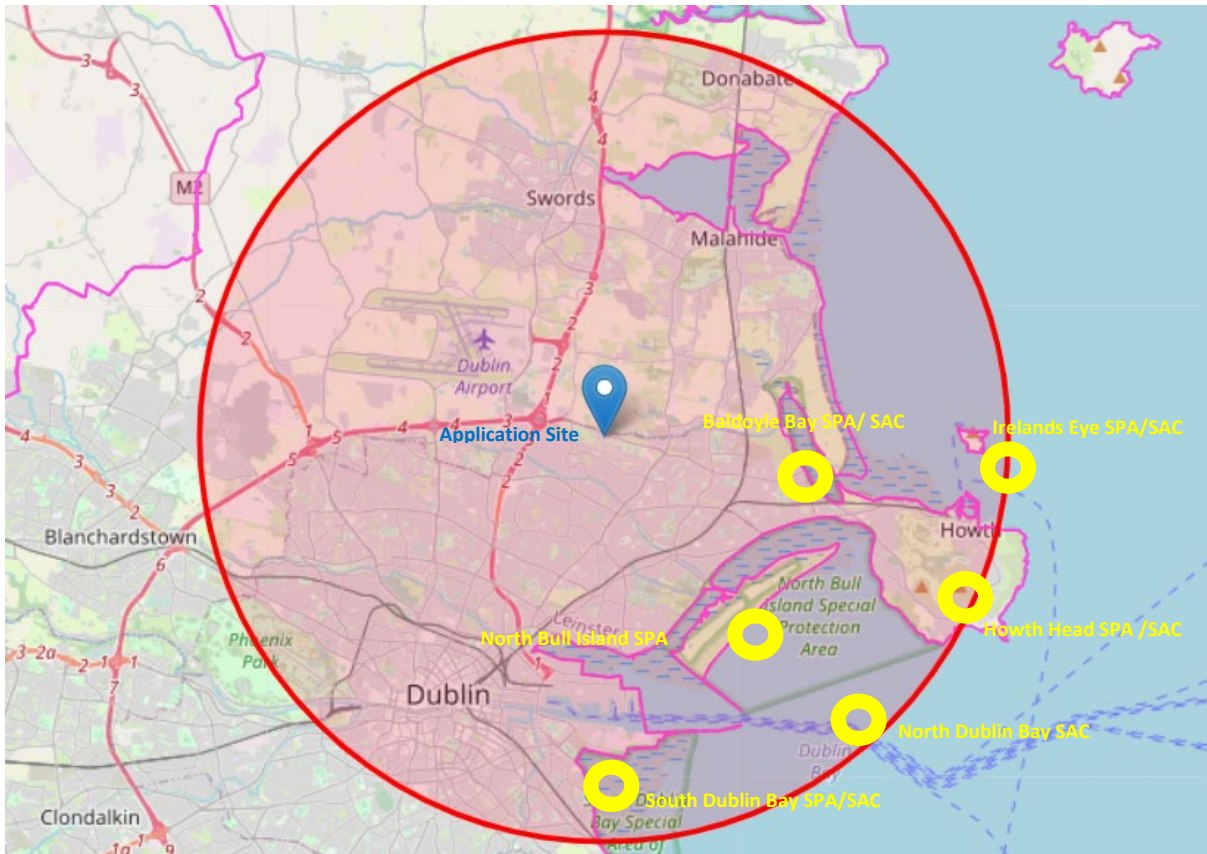
4.1 Management of European Sites

AA Screening is not required where the proposed development is connected with, or necessary to, the management of any Designated Site. In this case the proposed development is not connected, directly or indirectly, with or necessary to the management of any Designated Site.

4.2 Likely Direct, Indirect or Secondary Impacts of the Project on the European Sites

The location of the Designated Sites are shown below in Figures 3 below and the distance of each to the application site and the lack of any direct pathways to either should be noted from what is a relatively modest and to what is not too dissimilar in planning terms to that previously granted and in place in the form of a group housing scheme.

Figure 3: *European Sites within 10km of the site*



There are 10 European sites within the zone of influence of the proposed development. The proposed development is not situated within any SACs or SPAs, therefore no direct impacts will occur through land take or fragmentation of habitats. There is no hydrological connectivity between any of the proposed sites and any SPA, therefore the proposed development will not result in a reduction in water quality within any SPA. The proposed development will not result in significant adverse effects on the SPAs. The proposed development is also located some 5.5km from the North Dublin Bay SAC and this intervening area comprises substantial suburban development.

No potential significant adverse effects on European sites have been identified during either the construction or the operational phase. The proposed development by its location, nature and scale, on its own, or in conjunction with any other project (extent planning permissions) or plans (either zoning provided in the Dublin City Development Plan 2022-2028 of the Belmayne Masterplan).

Further necessary Appropriate Assessment has been carried out as follows:

1. *Is the proposed development directly connected to or necessary for the conservation management of the SPA and/or cSAC? (If yes, no further assessment required. If no, screening required.)*
No
2. *Is the proposed development located within or partly within the SPA?*
No.
3. *Is the proposed development located within 100m of the SPA?*
No
4. *Does the proposed project involve the development, extension or upgrade of a cycleway or walkway within 200m of the SPA?*

No.

5. *Does the proposed development involve development in the intertidal or coastal zone within the potential impact zone of the SPA?*

No

6. *Could the proposed project increase the level of recreational or other use of marine or intertidal areas within the potential impact zone of the SPA?*

No.

7. *Does the proposed development involve the excavation of previously undeveloped land within an area that has been identified to be at risk of flooding within the potential impact zone of the SPA?*

No.

8. *Does the proposed development involve the removal of significant amounts of topsoil within 100m of the SPA?*

No.

9. *Does the existing wastewater treatment system have the capacity to treat any additional loading?*

Yes.

10. *Would the proposed development result in direct surface water or other discharge to water bodies in or feeding into the SPA or cSAC? Would it result in additional storm flows into a combined sewer and subsequently into a combined sewer overflow (CSO), resulting in increased frequency, quantity and/or duration of overflow from the CSO to watercourses feeding into the European sites?*

No.

11. *Would the proposed development involve dredging or could it result in the mobilisation of marine sediments in the Harbour area?*

No.

12. *Could the proposed development give rise to increased risk of oil or chemical spillage or leaks within the marine environment or watercourse within the potential impact zone for the SPA or cSAC?*

No.

13. *Are there relevant plans or projects which, in combination with the proposed development, are likely to give rise to any cumulative effects?*

No.

In summary the proposed development is modest in nature and scale and given the state and nature of the subject site, the distance and lack of pathways to Designated Sites either on its own or in conjunction with any other project or plan, there is considered to be no impact upon any Designated Site.

4.2.1 Cumulative Impacts with Other Plans and Projects in the Area

As part of the screening for an AA, in addition to the proposed works, other relevant projects and plans in the region must also be considered at this stage and assessed in the context of potential for in-combination effects. There are no plans or projects that could be considered to interact with the proposed development. It is therefore concluded that there will be no negative in-combination effects between the proposed development and any plans or project in the area.

4.3 Planning History

The National Planning Application Database was consulted on the 23rd November 2023 for the purpose of this study and the application that have been submitted in the past five years (2018-2023) within 500m of the site are summarised in Table 1.

Table 1: Planning History

Planning Ref.	Description	Decision
4676/23	Permission: The development will consist of building an end-of-terrace 2-storey house to the side of the existing dwelling at 20 Belcamp Crescent, with new vehicular access from Belcamp Crescent and all associated site and drainage works.	Pending
4748/23	Retention: Of a single storey portacabin-type structure for use as a senior centre, and associated site works.	Pending
3041/22	Mayne Stability Limited intends to apply for permission for a period of 10 years for the development of access to the Synchronous Compensator Development (Grid Stabilisation Facility) on the site of a c 0.94 ha. at lands south of Belcamp 220KV substation, Belcamp Dublin 17.	DCC Granted 11/10/22
3504/22	Planning permission for development at this site will consist of demolishing an existing shed to the rear of the existing site and building a new ground & first floor extension to the rear of the existing house. A proposed new ground floor only porch to the front of the existing house and all ancillary works.	DCC Granted 14/06/22
3742/22	Permission for conversion of existing attic space comprising of modification of existing roof structure, roof window to the front, new access stairs and flat roof dormer to the rear.	DCC Granted 25/7/22
3582/21	Planning permission for the development will consist of a proposed new ground floor only extension to the rear of the existing house and all ancillary works.	DCC Granted 7/1/22
2377/21	The development will consist of demolishing an existing shed to the rear of the existing site and building a new ground & first floor extension to the rear of the existing house. A proposed new ground floor only porch to the front of the existing house and a new window in the side elevation and all ancillary works.	DCC Granted 21/6/21
2378/21	The development will consist of demolishing existing garage to the side of the existing house and building a new ground floor only extension to the side of the existing house and all ancillary works.	DCC Granted 21/6/21

None of these developments are considered to generate a cumulative impact with the subject development.

4.4 Screening Assessment

Following the assessment above Table 2 below identifies the potential direct, indirect and secondary impacts of the proposed development on European Sites within the c10 km radius.

Table 2: Qualifying Interests of relevant SPAs and SACs during construction

No.	Site Name	Site Code	Qualifying Interests
1.	Baldoyle Bay SPA	004016	Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Shelduck (<i>Tadorna tadorna</i>) [A048] Ringed Plover (<i>Charadrius hiaticula</i>) [A137] Golden Plover (<i>Pluvialis apricaria</i>) [A140] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Wetland and Waterbirds [A999]
2.	Baldoyle Bay SAC	000199	Mudflats and sandflats not covered by seawater at low tide [1140] Salicornia and other annuals colonising mud and sand [1310] Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330] Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410]
3.	Howth Head SAC	000202	Vegetated sea cliffs of the Atlantic and Baltic coasts [1230] European dry heaths [4030]
4.	Howth Head Coast SPA	004113	Kittiwake (<i>Rissa tridactyla</i>) [A188]
5.	North Bull Island SPA	004006	Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Shelduck (<i>Tadorna tadorna</i>) [A048] Teal (<i>Anas crecca</i>) [A052] Pintail (<i>Anas acuta</i>) [A054] Shoveler (<i>Anas clypeata</i>) [A056] Oystercatcher (<i>Haematopus ostralegus</i>) [A130] Golden Plover (<i>Pluvialis apricaria</i>) [A140] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Knot (<i>Calidris canutus</i>) [A143] Sanderling (<i>Calidris alba</i>) [A144] Dunlin (<i>Calidris alpina</i>) [A149] Black-tailed Godwit (<i>Limosa limosa</i>) [A156] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Curlew (<i>Numenius arquata</i>) [A160] Redshank (<i>Tringa totanus</i>) [A162] Turnstone (<i>Arenaria interpres</i>) [A169] Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] Wetland and Waterbirds [A999]
6.	North Dublin Bay SAC	000206	Mudflats and sandflats not covered by seawater at low tide [1140] Annual vegetation of drift lines [1210] Salicornia and other annuals colonising mud and sand [1310] Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330] Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410] Embryonic shifting dunes [2110] Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] Humid dune slacks [2190] <i>Petalophyllum ralfsii</i> (Petalwort) [1395]
7.	Ireland's Eye SAC	002193	Perennial vegetation of stony banks [1220] Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]
8.	Ireland's Eye SPA	004117	Cormorant (<i>Phalacrocorax carbo</i>) [A017] Herring Gull (<i>Larus argentatus</i>) [A184] Kittiwake (<i>Rissa tridactyla</i>) [A188] Guillemot (<i>Uria aalge</i>) [A199] Razorbill (<i>Alca torda</i>) [A200]
9.	South Dublin Bay SAC	000210	Mudflats and sandflats not covered by seawater at low tide [1140] Annual vegetation of drift lines [1210] Salicornia and other annuals colonising mud and sand [1310] Embryonic shifting dunes [2110]
10.	South Dublin Bay SPA	004024	Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Oystercatcher (<i>Haematopus ostralegus</i>) [A130] Ringed Plover (<i>Charadrius hiaticula</i>) [A137] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Knot (<i>Calidris canutus</i>) [A143] Sanderling (<i>Calidris alba</i>) [A144] Dunlin (<i>Calidris alpina</i>) [A149] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Redshank (<i>Tringa totanus</i>) [A162] Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] Roseate Tern (<i>Sterna dougallii</i>) [A192] Common Tern (<i>Sterna hirundo</i>) [A193] Arctic Tern (<i>Sterna paradisaea</i>) [A194] Wetland and Waterbirds [A999]

In accordance with the Habitats Directive, an Appropriate Assessment (AA) Screening has been carried out on the project, in relation to any potential impacts upon the Baldoyle Bay SPA [004016], Baldoyle Bay SAC [000199], Howth Head SAC [000202], Howth Head Coast SPA [004113], North Bull Island SPA [004006], North Dublin Bay SAC [000206], Ireland's Eye SAC [002193], Ireland's Eye SPA [004117], South Dublin Bay SAC [000210], and South Dublin Bay SPA [004024].

The findings of the AA screening noted that no significant effects on any Natura 2000 sites is likely, and it was not necessary to undertake any further stage of the Appropriate Assessment process.

Table 3: Potential Significant Effects on European Sites from the Proposed Development within 10km

Site Name and Code	Direct Impacts	Indirect/ Secondary Impacts	Resource Requirements	Emissions (Disposal to land, Water or Air)	Excavation Requirements
Baldoyle Bay SPA [004016]	No impact on QI	No impact on QI	No impact on QI	No impact on QI	No impact on QI
Baldoyle Bay SAC [000199]	No impact on QI	No impact on QI	No impact on QI	No impact on QI	No impact on QI
Howth Head SAC [000202]	No impact on QI	No impact on QI	No impact on QI	No impact on QI	No impact on QI
Howth Head Coast SPA [004113]	No impact on QI	No impact on QI	No impact on QI	No impact on QI	No impact on QI
North Bull Island SPA [004006]	No impact on QI	No impact on QI	No impact on QI	No impact on QI	No impact on QI
North Dublin Bay SAC [000206]	No impact on QI	No impact on QI	No impact on QI	No impact on QI	No impact on QI
Ireland's Eye SAC [002193]	No impact on QI	No impact on QI	No impact on QI	No impact on QI	No impact on QI
Ireland's Eye SPA [004117]	No impact on QI	No impact on QI	No impact on QI	No impact on QI	No impact on QI
South Dublin Bay SAC [000210]	No impact on QI	No impact on QI	No impact on QI	No impact on QI	No impact on QI
South Dublin Bay SPA [004024]	No impact on QI	No impact on QI	No impact on QI	No impact on QI	No impact on QI

The Baldoyle Bay SPA and Howth Head SPA have no hydrological or ecological connectivity and have been screened out of further assessments. The Howth Head and North Bull Island SPA have no ornithological connectivity and has been screened out of further assessments. Ecological connectivity has been assessed for the SACs mentioned in Table 2. The North Dublin Bay SAC and Ireland's Eye SAC are designated for habitat features that will not be affected by the proposed development, as there is no pathway for potential impacts. Where connectivity does not exist, there are no pathways for likely impacts, therefore the Natura 2000 sites within the study area that do not have ecological connectivity with the proposed development site will not be considered further within this assessment. There is no impact on any Qualifying Interests identified in Table 2 as shown in Table 3.

The application site mostly consists of hardstanding areas of tarmac and pavement which are of no ecological value to the qualifying species of the SACs listed in Table 2 above. It is considered that the survey area is unlikely to support any of the Annex II species or assemblages listed above. This is likely to be an inhospitable environment for any protected species or qualifying interest of any Designated Sites including bats.

It is therefore considered that the proposed development will have no significant negative effect on the qualifying habitats and species of the SACs listed above.

4.5 Likely Changes to the European Site(s)

There are no likely changes to any Designated Site.

4.5.1 Elements of the Project where the Impacts are Likely to be Significant

No elements of the proposed development are likely to cause significant effects to the Designated Sites.

Please note that the proposed development has been screened to determine whether an **Environmental Impact Assessment (EIA)** is required, and it has been concluded that there will be no real likelihood of significant effects on the environment arising from the proposed development and that an EIA is not required.

4.5.2 Site Visit

An ecological site walkover was carried out on the 06/11/2023 by Eamonn Prenter MIPI MRTPI. No evidence of protected or notable species associated with connected Natura 2000 sites were observed.

4.5.3 Construction

Works on site, dust and surface water runoff on site during construction or operation may lead to silt or contaminated of any waterbodies subject to implementation of an Outline Construction Management Plan (OCMP). Mitigation against any impact on any Designated Site is set out in the Outline Resource and Demolition Waste Plan (ORDWP).

The use of plant and machinery, as well as the associated storage of construction materials, oils, fuels and chemicals in addition to exporting materials offsite would lead to pollution on site or in adjacent drainage ditches and watercourses if there were any, but there are not. Contaminated wastewater from onsite toilets, could cause localised pollution. Mitigation contained within the accompanying OCMP and ORDWP would prevent impact on any Designated Site, and in particular prevention of impact on traffic management, air quality and noise and vibration.

All of these effects would be expected to be localised in nature restricted to the immediate vicinity of the site and would have little effect on European sites.

5 CONCLUSION

This AA screening report has been prepared to assess whether the proposed development, individually or in-combination with other plans or projects, and in view of best scientific knowledge, is likely to have a significant effect on any European site(s).

The screening exercise was completed in compliance with the relevant European Commission guidance, national guidance and case law. The potential impacts of the proposed development have been considered in the context of the European sites potentially affected, their qualifying interests or special conservation interests, and their conservation objectives.

Through an assessment of the source-pathway-receptor model, which considered the zone of influence of effects from the proposed development and the potential in-combination effects with other plans or projects, the following findings were reported:

The Proposed Development, either alone or in-combination with other plans and/or projects, does not have the potential to significantly affect any European site, in light of their conservation objectives. Therefore, a Stage 2 Appropriate Assessment is deemed not to be required.

CUNNANE STRATTON REYNOLDS

Environmental Impact Assessment Screening Report


**Prepared by
Cunnane Stratton Reynolds**

**For a Part 8 planning application for
9 no. residential units and associated site works**

**At
Cara Park, Belcamp Lane, Coolock, Dublin 17.**

Document Control Sheet

Date	Issue	By	Type
22/11/23	Draft	EMP/ML	Draft
23/11/23	Draft	EMP/ML	Revision
30/11/23	Draft	EMP/ML	Final

Issued	Signed
30/11/23	

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Disclaimer: The advice in this report has been informed by a search of the available online planning history and development plan zoning objectives for the site in question, and excludes consideration of other existing or potential, perceived or actual issues including but not exclusively relating to wayleaves, other rights of way, ownership, availability or otherwise of access, flood risk, infrastructural constraints, and of other advices produced in relation to the site by other parties. Our advice has been prepared without consultation with any other party including the local authority in whose jurisdiction the site is located. We reserve the right to amend the advice contained in the report based upon the availability of further information as and when it may become available. The site boundary indicated in Figures 1 is indicative only.

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STATEMENT OF COMPETENCY

The EIAR Screening Report has been compiled by Eamonn Prenter of Cunnane Stratton Reynolds Ltd (CSR). Eamonn is a Director of CSR and a member of the Irish Planning Institute. His qualifications are as follows:

Eamonn Prenter, *BA (Hons) Geography, MSc Planning; MRTPI MIPI,*

Eamonn is a chartered town planner with both public and private experience and over 30 years post qualification experience having undertaken a number of EISs, EIARs, SEAs and various screening reports over that period of time for both public and private sector clients.

Eamonn undertook an extensive walk through the application site and surrounding area as part of this assessment.

1.0 INTRODUCTION

1.1 Background

Cunnane Stratton Reynolds has prepared this EIAR Screening Assessment on behalf of Cotter & Naessens Architects who have prepared a planning scheme under Part 8 of the Planning and Development Act 2000, as amended, on behalf of Dublin City Council for residential development at Belcamp, Dublin 17.

Details of the construction and design of the proposed development are provided in the technical reports attached to the planning application.

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

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

This EIAR Screening Statement has been prepared having regard to Directive 2011/92/EU, as amended by Directive EU 2014/52 which came into effect in May of 2017. As at the time of writing, Ireland has not yet transposed the Directive. The EIAR Screening Statement has been written to address the guidance provided by “*Advice on Administrative Provisions in Advance of Transposition and Implementation of Directive 2014/52/EU on the effects of certain public and private projects on the environment (EIA Directive)*” and the Key Issues Consultation Paper’ prepared by the Department of Housing, Planning Community and Local Government, May 2017. This EIA Screening Report is also informed by the advice contained in the Department of Housing, Local Government and Heritage guidance to date, in particular Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, August 2018. This EIAR Screening Report has had regard to more recent advice in the form of ‘*Guidelines on Information to be contained in Environmental Impact Assessment Reports*’ published by the Environmental Protection Agency in May 2022.

This EIA Screening exercise was completed to determine the potential for the proposed development and activity to have significant environmental effects or not. The exercise has been informed by a desk study of the site, based on best available information and a site visit undertaken by CSR staff on 6th November 2023. The following is a summary of the findings of this report:

- The proposed development does not constitute development for which EIA is mandatory or required.
- In terms of scale, development and operation of the proposed residential development, comprising 9 no. units, does not fall under those projects requiring mandatory EIAs as prescribed in Annex I of the EIA Directive (Schedule 5, Part 1 of the Planning and Development Regulations 2001, as amended). Therefore, a mandatory EIA is ruled out for reasoning set out in below. Given that the status of the development activity is therefore sub-threshold, the requirement for EIA must be determined on a specific case basis.

- This screening report concludes that development as proposed will not result in significant negative impacts on the environment.

1.2 Purpose of this EIAR Screening Report

An EIAR is:

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

This EIA screening report is prepared for Dublin City and is submitted as part of the consent process. The competent authority (CA), also Dublin City Council, will use the information provided to assess the environmental effects of the project and, in the context of other considerations, to help determine if consent should be granted. The information in the EIAR is also used by other parties to evaluate the acceptability of the project and its effects and to inform their submissions to the CA.

An EIAR consists of a systematic analysis and assessment of the potential effects of a proposed project on the receiving environment. The amended EIA Directive currently in place prescribes a range of environmental factors which are used to organise descriptions of the environment and these factors must be addressed in any EIAR. These factors are considered in the context of screening for EIA as in this case.

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

The purpose of the report is to determine if an Environmental Impact Assessment (EIA) is required for the proposed development as set out in the mandatory and discretionary provisions of the Planning and Development Act, 2000, as amended and Schedule 5 of the Planning and Development Regulations, 2001, as amended 2023. The requirement for a sub-threshold development to be subject to EIA is determined by the likelihood that the development would result in significant environmental effects which may arise due to the location of the development or the characteristics of the development. The EIA screening exercise outlined below have examined the project with reference to the relevant thresholds and criteria.

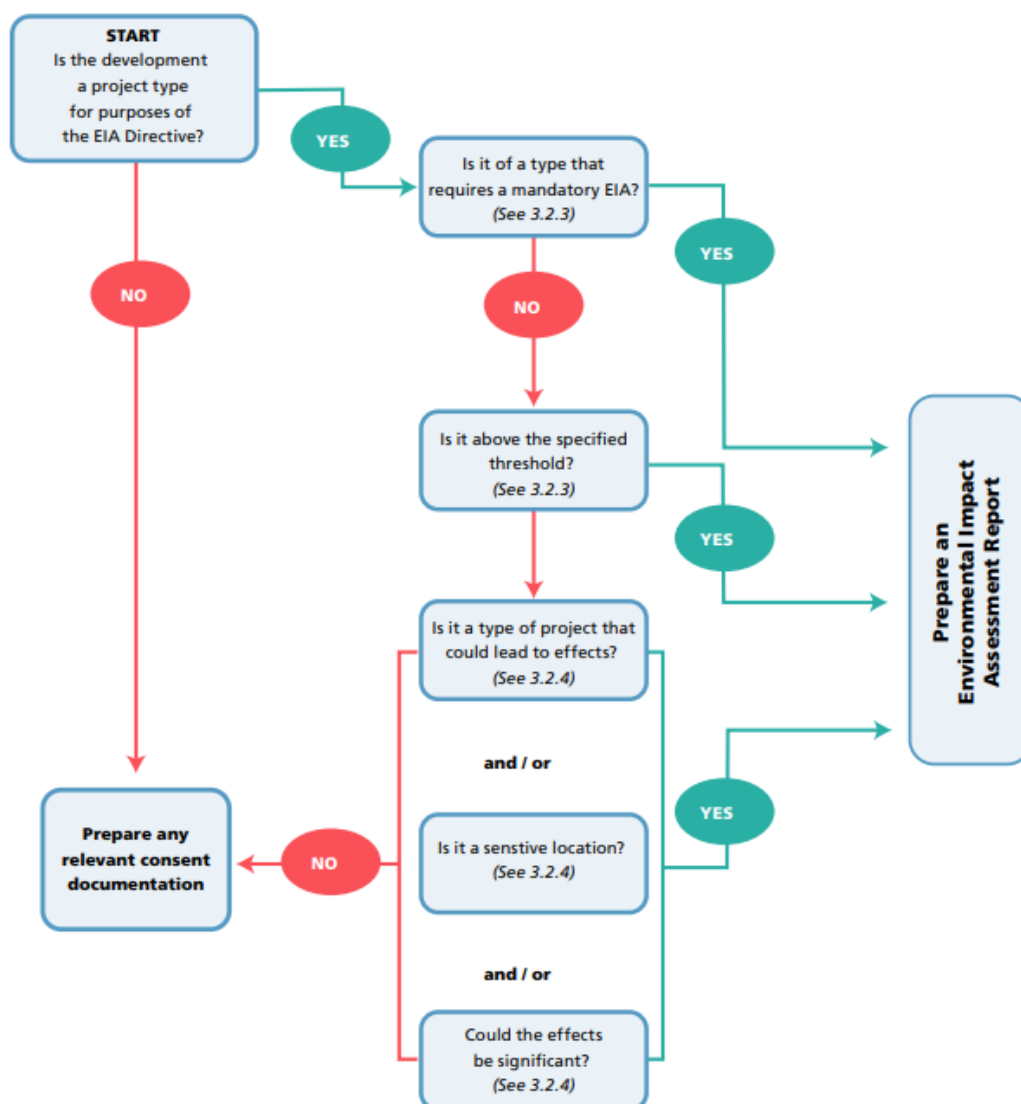
The term ‘screening’ is used to describe the process of ascertaining whether or not a proposed development requires an Environmental Impact Assessment Report to be provided to aid EIA by the competent authority of that project. EIAR is mandatory where project size, type or location EIA thresholds are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

The mandatory requirement for an EIAR is based on the nature and/or scale of a development. This is addressed in EU Directive 85/337/EEC (as amended by Directive 97/11/EC and 2014/52/EU). Regard must also be had to the criteria as set out under Annex III of the EIA Directive the majority of which criteria are also referred to under Schedule 7 and Schedule 7A of the Planning and Development Regulations 2001, as amended (‘the 2001 Regulations’).

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

The screening process is summarised in Figure 1 below.

Figure 1: Screening Process



Source, Table 3.2 Guidelines on the Information to be contained in Environmental Impact Assessment Reports, May 2022.

The project giving rise to this Screening Report is the proposed development of 9 housing units at Cara Park as set out in more detail below.

1.3 Objectives and Work brief

This EIA screening report is being submitted as part of the planning application process for the proposed development referenced above and has been prepared to assist in the decision as to whether and EIA is required. The question of whether an EIA is required arises only in relation to the projects that fall within the scope of one or more of the project classes listed in Annex 1 or 11 of the EIA Directive 2011/92/EU and/or corresponding classes or projects listed in Schedule 5, Parts 1 and 2 of the Planning and Development regulations 2001, as amended. Projects which do not fall within the scope of the listed projects are not subject to any requirements for an EIA or screening EIA under EIA Directive 2011/92/EU as amended 2014/52/EU.

2.0 THE PROPOSED DEVELOPMENT, LOCATION AND PLANNING CONTEXT

2.1 The Proposed Development

The subject development comprises 9 no. residential units to supplement the existing group housing scheme. There are effectively 3 plots within the application site, namely Plot A, Plot B and Plot C.

The proposed scheme will also improve the on site drainage with SUDS and on site permeable paving areas from the existing predominantly impermeable drainage regime.

Within Plot A it is proposed to demolish the existing dilapidated single storey community building, of irregular shape, and to provide 6 no. two storey semi detached units each comprising 3 no. bedroom. Plot A currently comprises the dilapidated structure and a number of temporary caravans. The proposal at this location will provide 6 no. permanent homes where there are currently two or three mobile homes.

Plot B currently comprises a single mobile home and seeks to replace this with 1 no. two storey, three bedroom unit.

Plot C comprises a former training centre which will be demolished and replaced with 2 no. single storey semi detached 2 bedroom bungalows, reflective of the character and appearance of a number of existing such bungalows in this estate.

For each residential unit proposed there is front and rear garden and in the case of proposed units within plots A and B, also allocated space for a 4 no. person, 2 no. bed touring caravan. Each unit is well appointed and reasonably scaled and appropriate in its setting.

A copy of the proposed layout is excerpted below in Figure 1 which is a reproduction of Cotter and Naessens Proposed Site Layout Plan SK141.

Figure 1: Excerpt of the Proposed Layout



The proposed scheme of works will involve demolition of the two existing structures and ground clearance. There will be limited excavation to accommodate such relatively small housing units. There are no proposals to enhance the streetscape, change the road or access arrangement or otherwise alter the layout of the existing estate.

It is considered that the proposed development results in a considerable improvement to existing housing conditions for several families on site and in particular the replacement of temporary accommodation, in the form of existing caravans with permanent well-appointed homes.

The application is supported by:

- Outline Construction Management Plan (OCMP)
- Outline Resource and Demolition Waste Plan (ORDWP)

Both documents provide for the management of construction, demolition and control of waste. They also place an emphasis on mitigating potential environmental impact on traffic management, air quality and noise and vibration. A flood risk assessment indicates that the site is not prone to flooding.

This assessment is accompanied by Stage 1 Appropriate Assessment Screening carried out by Cunnane Stratton Reynolds (CSR).

2.2 The Application Site

The application site comprises some 29 bungalows as part of a group housing scheme over an area of 2.2ha. There are also 2 no. community buildings both of which are redundant for some time and which are currently strongly secure. There are a number of caravans on plots

A and B which will be removed to accommodate the proposed development. The existing layout is shown in Figure 2 below.

Figure 2: Existing Site Layout Plan



The existing site is broadly square in shape with a cul de sac taking vehicular traffic to the centre of the site. There is relatively little open space with pedestrian access to the south leading into the adjacent Darndale Park. There is one vacant plot, known as plot B, located to the north west. There is a singular vehicular access from the north east directly off the R139 which links the M50 to Clarehall, Coolock and Darndale.

The site is relatively flat. There are no waterways within or directly adjoining the site. There is no tree cover or appreciable vegetation within the site with private open space but very few, if any, gardens providing any grassed or natural open space. There was no sign of any wildlife living on the site since there are no habitats for such a purpose available on the application site. The application site has an extremely low ecological value.

There would appear to be no opportunity for hosting any protected species within the application site – it being too noisy, well lit and no host structures capable of doing so.

2.3 Location

The location of the site is shown in Figure 3 below. The site is located on the southern side of the R139 which links the M50 approximately 1km to the west to Clarehall District Centre some 1.5km to the east. The R139 is a busy road, dual laned in either direction, with a pedestrian footpath along its northern and southern side. The busy nature of the road is such that it can be noisy over certain periods.

The application site is bounded to the north by the R139; by St Michaels House and Belcamp Training Centre for those with intellectual difficulties to the west; by an existing housing estate to the east; and finally by Darndale Park which is an extensive park serving this estate and the surrounding residential area. The area is served by St Francis Senior National Catholic School. On the opposite side of the R139 there are the playing fields of Craobh Ciaran.

To the east is Clare Hall District Shopping Centre with a Tesco Anchor foodstore, smaller shops, food and beverage outlets, pharmacy, coffee shop and petrol filling station.

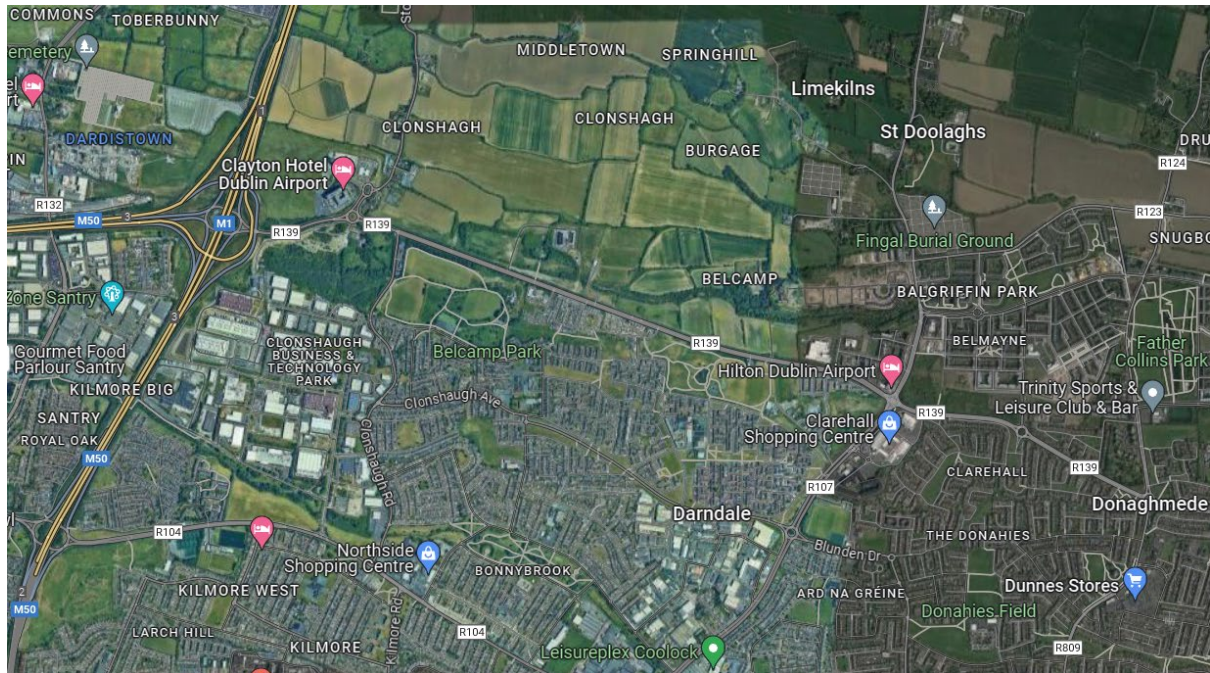
Figure 3: *Location of the Application Site*



Figure 4 shows that the application site is located a short distance from the airport and the junction of the M50 and M1. There is further excellent access to the national road network. In particular there is excellent access to the city centre and north County Dublin.

The site is located in an area of what could be termed the urban fringe with the south side of the R139 being more urban than the north side of the same road. There are substantial areas of residential development to the south beyond Darndale Park. A node of development is found at either end of the R139 with the Clarehall, Baldoyle and Balgriffin areas being the subject of substantial development in recent years. The area in general is becoming more urbanised.

Figure 4: Strategic Location of the Application Site



2.4 Planning Guidance and Policy

Project Ireland 2040 - National Planning Framework 2018

Project Ireland 2040 - National Planning Framework (NPF) is a key national planning policy document, providing a broad planning framework for development and population growth in Ireland. The NPF provides a series of contextual planning objectives, taking into account the future long term population growth and development needs of Ireland to 2040.

The application site at Cara Park, Belcamp is located within an existing developed area that is already connected to existing development services i.e., road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply and for which there is service capacity available and is therefore ready to accommodate new development. The proposed scheme will also improve the on site drainage with SUDS and on site permeable paving areas. National guidance advocates utilisation of urban opportunity sites and infilling and compact development such as this to reduce unsustainable urban sprawl. Maximising the development of brownfield and infill sites is particularly emphasised to make use of existing zoned and serviced lands, especially where there is enhanced public transport, and this certainly applies in this instance.

The residential development of this site would be fully consistent with a number of key National Policy Objectives (NPO's) that will deliver the NPF's overarching objective of compact growth, including the following specific objectives:

- NPO 3a – Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.*
- NPO 3b – Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.*
- NPO 6 - Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased*

residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.

NPO 11 - In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

NPO 13 - In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.

NPO 35 - Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

The proposed development is consistent with the above national policy objectives as it involves infill housing within an existing redevelopment of underutilised brownfield lands within Dublin City for a type of residential housing for which there is significant need. The proposed development, which would add 9 no. additional residential units to a group housing scheme within Dublin City's housing stock, is considered wholly consistent with the provision of the NPF.

Project Ireland 2040 – National Development Plan 2018-2027

The National Development Plan (NDP) named Project Ireland 2040 was adopted in 2018 to allocate some €115 billion over the following decade. The NDP has been revised to extend the budget of the NDP over a longer period as committed to in the Programme for Government 2020. The renewed National Development Plan 2021 – 2030 allocates a budget of €165 billion and was published in early October 2021 with “...with a particular focus on priority solutions to strengthen housing, climate ambitions, transport, healthcare, jobs growth in every region and economic renewal for the decade ahead.”

The National Planning Framework (NPF) co-named ‘Ireland 2040 Our Plan’ was adopted in conjunction with the NDP in 2018 and identifies Strategic Outcomes that match Investment Priorities of that NDP. Ireland 2040 Our Plan sets the strategic priorities for investment and chief amongst those is increasing housing supply which the proposed development directly addresses.

The NPF envisages that brownfield sites will deliver 40% of all new homes within the footprint of existing settlements, comprising at least 50% of all new homes in the five cities and 30% of new homes in settlements elsewhere. The current proposal of 9 no. housing units on an infill site is compliant with this policy guidance.

Ireland 2040 Our Plan recognises Ministerial Guidelines as underpinning the policy context for planning decisions. The NPF also recognises the need to provide for sustainable development, a high quality of life (replacing caravans in this instance with permanent homes). and healthy lifestyles – all of which is facilitated in the proposed development.

The application site benefits from the high-quality and high frequency bus corridor and dedicated cycle lanes providing direct access to the city centre. The site is close to Darndale Park, where quality open space is provided through children's play and sports facilities; Clonsaugh and Malahide Business Park; and educational establishments. Therefore, it is considered that this area can support redevelopment.

Housing for All – A New Housing Plan for Ireland 2021

The 'Housing for All – A New Housing Plan for Ireland' was published in September 2021 as part of the 'Our Shared Future' programme for Government. Housing for All is at once a policy and budget document with ring fenced budget of €20bn to activate that Plan that has 4 priorities, called pathways, each with specific actions that all aim to increase housing supply, within sustainability controls, and thus close affordability gaps. The proposed development is in accordance with this national housing policy and should be considered in the context of an ongoing and acutely worsening housing crisis across all sectors.

Increasing Social Housing Delivery

The Government is committed to increasing social housing delivery and will work with delivery partners to ensure that housing is available to the most vulnerable in society. Local Authorities have a key role in the delivery of homes and targets will be set for delivery by them with new Local Authority Housing Delivery Actions Plans, setting out how they plan to deliver on the objectives of Housing for All. They will roll out the largest house building programme in the history of the State by getting Local Authorities and AHBs back building at scale. Long-term leasing will be ended through phasing out new entrants with a renewed emphasis on building, not buying, social houses.

The following housing objectives are particularly significant in this case.

Housing Policy Objective 11.2 *Develop section 28 Guidelines for Planning Authorities on Sustainable and Compact Settlement Guidance (SCSG), including guidance on housing typologies to facilitate innovative approaches to medium and higher densities.*

Housing Policy Objective 12.2 *Develop proposals for new Urban Development Zones, to Q4 2021 DHLGH deliver a coordinated and transparent approach to the delivery of residential and urban development, particularly on brownfield sites, meeting the compact growth objectives of the National Planning Framework.*

It is clear that the proposed development responds to a recognised need, at national level, for residential accommodation and housing for the vulnerable in particular and therefore is entirely consistent with the above policies.

Regional Spatial and Economic Strategy for the Eastern and Midland Region

The Regional Spatial and Economic Strategy for the Eastern and Midlands Region (RSES) 2020 replaced the Regional Planning Guidelines (RPGs). The RSES provides a long-term regional level strategic planning and economic framework in support of the implementation of the National Planning Framework. In supporting the NPF, the RSES prioritises the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location, as in this case. To achieve compact growth, the RSES prioritises housing and employment development in locations within and contiguous to existing city footprints where such development can be served by public transport, walking and cycling. The subject development easily meets all these requirements and aspirations.

The RSES seeks to attain sustainable compact settlements with the 10-minute city and town concepts, whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or are accessible by high quality public transport services by connecting people to larger scaled settlements delivering these services. These aspirations are also met in this instance.

The RSES, like the NPF, promotes compact growth and sustainable development. The following Regional Policy Objectives are relevant:

RPO 3.2: Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built up area of Dublin city and suburbs and a target of at least 30% for other urban areas.

RPO 4.3 Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built-up area in Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.

The intensification of the development of this site to provide for an increase in residential accommodation without unacceptable impact is considered to be in accordance with the RSES. The site is located within the existing built-up area of Dublin City and is highly accessible by public transport (Bus Routes 15, 27, 42, 43) and is well served by services, shops and local amenities. There is no significant impact on amenity of those nearby.

Dublin City Development Plan 2022-2028

The Dublin City Development Plan 2022-2028 was adopted on the 2nd November 2022. The plan came into effect on 14th of December 2022.

Zoning

The subject site is zoned 'Z1 Sustainable Residential Development' with the objective "To protect, provide and improve residential amenities". The proposed development is acceptable in principle therefore.

Relevant Planning Policy

The following policies are considered to be complied with in this instance.

QHSN6 - Urban Consolidation - To promote and support residential consolidation and sustainable intensification through the consideration of applications for infill development, backland development, mews development, re-use/adaption of existing housing stock and use of upper floors, subject to the provision of good quality accommodation.

QHSN10 - Urban Density - To promote residential development at sustainable densities throughout the city in accordance with the core strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.

QHSN11 - 15-Minute City - To promote the realisation of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible.

Section 5.5.4 Social Inclusion

The following policies promote social inclusion.

QHSN14 - High Quality Living Environment - To support the entitlement of all members of the community to enjoy a high quality living environment and to support local communities, healthcare authorities and other bodies involved in the provision of facilities for groups with specific design/ planning needs.

QHSN17 - Sustainable Neighbourhoods - To promote sustainable neighbourhoods which cater to the needs of persons in all stages of their lifecycle, e.g. children, people of working age, older people, people living with dementia and people with disabilities.

These policy requirements are also met.

Section 5.5.6 Social, Affordable Purchase and Cost Rental Housing

The following policies have direct relevance to the proposed development. The proposed development, if permitted, will provide social housing in a housing sector of great need. Relevant policies on social, affordable and cost rental housing include the following which would all be met:

QHSN34 - Social, Affordable Purchase and Cost Rental Housing - To promote the provision of social, affordable purchase, cost rental and rental housing in accordance with the Council's Housing Strategy, Part V of the Planning and Development Act, as amended by the Affordable Housing Act 2021 and government policy as outlined in the DHLGH 'Social Housing Strategy 2020' and support the realisation of public housing.

QHSN35 - Diversity of Housing Type and Tenure - To support local authorities, approved housing bodies and other sectoral agencies in the provision of a greater diversity of housing type and tenure, including social and affordable housing, new models of cost rental and affordable homeownership and co-operative housing.

Other policies seek to ensure that the environment and designated sites will be protected which occur on this occasion.

2.5 Planning History

The National Planning Application Database was consulted on the 23rd November 2023 for the purpose of this study and the application that have been submitted in the past five years (2018-2023) within 500m of the site are summarised in Table 1.

Table 1: Planning History

Planning Ref.	Description	Decision
4676/23	Permission: The development will consist of building an end-of-terrace 2-storey house to the side of the existing dwelling at 20 Belcamp Crescent, with new vehicular access from Belcamp Crescent and all associated site and drainage works.	Pending
4748/23	Retention: Of a single storey portacabin-type structure for use as a senior centre, and associated site works.	Pending
3041/22	Mayne Stability Limited intends to apply for permission for a period of 10 years for the development of access to the Synchronous Compensator Development (Grid Stabilisation Facility) on the site of a c 0.94 ha. at lands south of Belcamp 220KV substation, Belcamp Dublin 17.	DCC Granted 11/10/22
3504/22	Planning permission for development at this site will consist of demolishing an existing shed to the rear of the existing site and building a new ground & first floor extension to the rear of the existing house. A proposed new ground floor only porch to the front of the existing house and all ancillary works.	DCC Granted 14/06/22

3742/22	Permission for conversion of existing attic space comprising of modification of existing roof structure, roof window to the front, new access stairs and flat roof dormer to the rear.	DCC Granted 25/7/22
3582/21	Planning permission for the development will consist of a proposed new ground floor only extension to the rear of the existing house and all ancillary works.	DCC Granted 7/1/22
2377/21	The development will consist of demolishing an existing shed to the rear of the existing site and building a new ground & first floor extension to the rear of the existing house. A proposed new ground floor only porch to the front of the existing house and a new window in the side elevation and all ancillary works.	DCC Granted 21/6/21
2378/21	The development will consist of demolishing existing garage to the side of the existing house and building a new ground floor only extension to the side of the existing house and all ancillary works.	DCC Granted 21/6/21

None of these developments are considered to generate a cumulative impact with the subject development.

3.0 LEGISLATIVE BACKGROUND

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

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

Part 10, Article 92, of the Planning and Development Regulations define ‘*sub threshold development*’ as ‘*development of a type set out in Part 2 of Schedule 5 which does not equal or exceed, the case may be, a quantity, area or other limit specified in that Schedule in respect of the relevant class of development.*’

3.1 Project Type

The screening process begins by establishing whether the proposal is a ‘project’ as understood by the Directive (as amended). The development of housing, provision of car and caravan parking, open space, and associated site works do in this instance constitute a ‘project’ as it constitutes a development that requires planning permission under the planning and development statutes.

3.2. Thresholds

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

It must be ascertained whether the proposal is a type where EIA and thus EIAR is prescribed/mandated and whether it exceeds the applicable thresholds or not. The Guidelines on Environmental Impact Assessment Reports published by the EPA in May 2022 note that projects that at first glance may not appear to come under the Schedule, but on closer examination when

the process is further examined, may do so because of the sensitivity or significance of the receiving environment etc.

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

3.3 Mandatory EIAR

Other categories of specified EIA development are listed in Schedule 5 (Part 1 and Part 2) of the Planning and Development Regulations, 2001, as amended. These and those in the amended EIA Directive 2014/52/EU (also reference Directive 2011/92/EU) Annex II and Annex III have also been reviewed and it is not considered that the proposed development breaches any relevant threshold.

In the amended EIA Directive 2014/52/EU, Annex I contains projects referred to in Article 4(1) of the Amended Directive. The subject proposal would fall within none of these classes of development and therefore does not represent a form of development considered under Annex I where EIAR is considered mandatory.

In the amended EIA Directive 2014/52/EU, Annex II contains projects referred to in Article 4(2) of the amended Directive. There are various forms of development (including sub-classes) that are referred to in that Annex. The proposal would not fall within any such category and a mandatory EIAR is not required in this instance.

The subject development does not fall within development classes set out in Part 1 of Schedule 5 of the Planning and Development Regulations 2001, as amended.

The Planning and Development Regulations 2001, Schedule 5, Part 2, Section 10(b)(iv) sets out that an EIAR is mandatory for an urban development which would involve an area greater than 2 hectares in the case of business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere. The relevant threshold in the present case is 10 hectares as the site is located in an urban area. However, the area of the proposed development is considerably below the appropriate threshold at 2.2ha. A mandatory EIA is not triggered in regard to this site area threshold therefore.

The relevant class/scale threshold for development to be considered is set out in Schedule 5 (Part 2) of the Regulations under Class 10 (Infrastructure Projects) where construction of more than 500 dwelling units requires a mandatory EIAR. In this case the provision of 9 no. units falls considerably below that threshold.

3.4 Screening for Sub-Threshold EIA

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

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

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

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

This screening exercise has determined that the subject application does not meet or exceed the applicable threshold of 10 ha at Schedule 5, Part II, 10 in the present case as the application site measures 2.2ha.

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

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

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

1. A description of the project including, in particular:
 - (a) A description of the physical characteristics of the whole project, and where relevant, of demolition works,
 - (b) A description of the location of the project, 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 project.
3. A description of any likely significant effects, to the extent of the information available on such effects, of the project on the environment resulting from,
 - (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.
4. The criteria of Annex II shall be taken into account, where relevant, when compiling the information in accordance with points 1 to 3.

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

Schedule 7 of the Planning and Development Regulations, 2001, as amended, lists criteria for determining whether development listed in part 2 of Schedule 5 should be subject to an

environmental impact assessment by virtue of the following as per Annex III of the EIA Directive as amended:

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

I. Characteristics of Proposed Development

The characteristics of project, with particular regard to:

- the size and design of the whole project,
- cumulation with other existing and / or approved development,
- the use of natural resources, in particular land, soil, water and biodiversity;
- the production of waste,
- pollution and nuisances,
- the risk of major accidents and / or disasters which are relevant to the project concerned, including those caused by climate changes, in accordance with scientific knowledge,
- the risk to human health (for example due to water contamination or air pollution).

II. Location of Proposed Development

The environmental sensitivity of geographical areas likely to be affected by projects must be considered, with particular regard to:

- the existing and approved land use,
- the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground,
- the absorption capacity of the natural environment, paying particular attention to the following areas:
 - (a) wetlands, riparian areas, river mouths;
 - (b) coastal zones and the marine environment;
 - (c) mountain and forest areas;
 - (d) nature reserves and parks;
 - (e) areas classified or protected under national legislation, including Natura 2000 areas designated by Member States pursuant to Directives 92/43/EEC and 2009/147/EC,
 - (f) areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure,
 - (g) densely populated areas,
 - (h) landscapes and sites of historical, cultural or archaeological significance.

III. Type & Characteristics of Potential Impacts

The likely significant effects on the environment proposed development in relation to criteria set out under paragraphs 1 and 2 of this Annex, with regard to the impact of the project on the factors specified in Article 3(1), taking into account:

- the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected),
- the nature of the impact;
- the transboundary nature of the impact,
- the intensity and complexity of the impact,
- the probability of the impact,
- the expected onset, duration, frequency and reversibility of the impact.
- the cumulation of the impact with the impact of other existing and / or approved projects;

- the possibility of effectively reducing the impact.

As per the requirements of the 2014 Directive, this Screening Report provides details of the information specified in Annex IIA, taking account of the criteria in Annex III. The screening statement sets out information under the headings provided for under Schedule 7 of the 2001 Regulations. In effect, this ensures that all of the information required under Schedule 7A has been furnished. It also presents the information in a manner that facilitates the competent authority in its screening assessment.

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

3.5 EIA SCREENING LEGISLATION AND GUIDANCE

Key EIA legislation includes the EIA Directive 2011/92/EU, as amended by Directive 2014/52/EU (together, the EIA Directive) on the assessment of the effects of certain public and private projects on the environment is designed to ensure that projects likely to have significant effects on the environment are subject to a comprehensive assessment of environmental effects prior to development consent being granted. The objective of the Directive (2014/52/EU) is to "ensure a high level of protection of the environment and human health, through the establishment of minimum requirements for Environmental Impact Assessment (EIA), prior to development consent being given, of public and private development that are likely to have significant effects on the environment".

The environmental assessment must identify, describe and assess the direct and indirect significant impacts of the project on specified environmental factors (Article 3 (1) of the Directive and 171a(b) and 172 of the Planning and Development Act 2000).

The requirements of the EIA Directives apply only in relation to projects listed in Annex I and II of the EIA Directive which is clear from Article 2, paragraph 1 of the Directive which provides that "before consent is given, projects likely to have significant effects on the environment by virtue of their nature, size or location are made subject to a requirement for development consent and an assessment with regard to their effects on the environment (EIA). Those projects are defined in Article 4". Article 4 provides that projects listed in Annex I shall be subject to a mandatory EIA and projects listed in Annex II shall be subject to determination as to whether an EIA is required through (a) case-by-case examination or (b) subject to thresholds or criteria set by the Member State.

In Ireland, EIA provisions relating to planning permissions are contained in the Planning and Development Act, 2000, as amended (Part X) (hereafter referred to as "the Planning Act"), and in the Planning and Development Regulations, 2001, as amended (Part 10) ("the Regulations"). Projects requiring an EIA are listed in Schedule 5 (Parts 1 and 2) of the Regulations. Where a project is listed in Part 2 of Schedule 5 but is classed as "sub-threshold" development, planning authorities under article 103 of the Regulations may request an EIAR where it considers the proposed development is likely to have a significant effect on the environment. Schedule 7 and 7A of the Regulations must be considered in the decision as to whether a proposed development is likely to have a significant effect on the environment. "Sub-threshold" development "means development of a type set out in Schedule 5 which does not exceed a quantity, area or other limit specified in that Schedule in respect of the relevant class of development". The prescribed classes of development for the purpose of section 176 of the Act are set out in Schedule 5.

The outcome of the EIA process does not, in itself, determine the outcome of an application for development consent for a project. The Planning Authority and An Bord Pleanála must consider each application for development consent on its own merits, taking into account all material

considered, including conclusions in respect of EIA, before making its decision to grant with or without conditions, or to refuse consent.

3.6 EIA Guidelines

The Department of Housing, Planning and Local Government (DHPLG) revised the Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, in August 2018%. These updated Guidelines deal with the legislative provisions resulting from the 2014 EIA Directive and the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) and how they are to be addressed in practice.

Recently the EPA published draft Guidelines on the Information to be Contained in Environmental Impact Assessment Reports? (May 2022), which includes guidance on preparing an EIAR and the screening process. In addition, both the European Commission and the Institute of Environmental Management and Assessment* (IMA) have published guidance on various aspects of the EIA process which includes guidance on screening.

This report has been prepared with reference to each of the above documents.

The Office of the Planning Regulator (OPR) has issued guidance in the form of the Environmental Impact Assessment Screening, Practice Note (PN02) in June 2021 which aids Planning Authorities as the Competent Authority in this area. The practice does not duplicate or replace any existing guidance or advice but focuses on the EIA screening exercise. It provides a step-by-step (3 step) approach to the process of screening for EIA.

For all sub-threshold developments listed in Schedule 5 Part 2, under Article 103(1) of the Regulations, where EIAR is submitted or EIA determination is requested, a screening determination exercise is required to be undertaken by the competent authority unless, of preliminary examination it can be concluded that there is no real likelihood of significant effect on the environment. Article 103(1)(b)(i) – (iii) and 109(2)(b)(i) – (iii) of the Regulation states.

(a) Where planning applications for sub-threshold development is not accompanied by an EIAR, the planning authority shall carry out a preliminary examination of, at the least, the nature, size or location of the development.

(b) Where the planning authority concludes, based in such preliminary examinations, that-

(i) "there is no real likelihood of significant effects on the environment arising from the proposed development, it shall conclude that an EIA is not required,

(ii) There is significant and realistic doubt in regard to the likelihood of significant effects on the environment arising from the proposed development, it shall, by notice in writing served on the applicant, require the applicant to submit to the authority the information specified in Schedule 7A for the purposes of a screening determination unless the applicant has already provided such information, or

(iii) there is a real likelihood of significant effects on the environment arising from the proposed development, it shall-

(I) conclude that the development would be likely to have such effects, and

(II) by notice in writing served on the applicant, require the applicant to submit to the authority an EIAR and to comply with the requirements of article 105".

4.0 REQUIREMENTS OF ANNEX II(A) OF 2014/52/EU

4.1 Characteristics of the Proposed Development

The planning application proposes a very modest scale of development namely 9 no. residential units over two house types. The houses comprise one and two storeys and range from two to three bedrooms. The proposal also involves demolition of two existing structures formerly in community use. The proposed scheme will improve the on site drainage with SUDS and on site permeable paving areas.

There are no communal facilities proposed, no public open space and no new vehicular or pedestrian access. This is a sensitive site insofar as this is a residential estate albeit a relatively small one.

Further details of the proposed development are set out in the attached design statement by Cotter and Naessens Architects.

4.2 Location of the Proposed Development

As indicated above the location is characterised as urban fringe with the southern side of the R139 where the application is located being more urban in character. The southern area is characterised as relatively open with a number of existing and former institutional uses and activities on extensive grounds. The area immediately to the south beyond Darndale Park is relatively densely development with sprawling housing estates.

The application site is essentially a small grouped housing estate and the three plots are all located within that housing estate. There has high site coverage but a relatively low density with low height structures. The area to the south of the R139 is expected through existing zonings and planning policies to be more extensively and more intensively developed. The Clarehall area, to the east, is the subject of an emerging masterplan which will also take development towards the application site. The area across the road from the R139 is likely to remain more rural in nature not least because of the preponderance of sports pitches and recreational areas.

The existing site comprises 41 no. residential chalets and a redundant training facility and community centre, both of which are to be demolished. It is not believed that the site is in any way contaminated nor would there be evidence of asbestos or harmful/hazardous materials on site, such that there would be hazard or danger to health or safety, should development proceed.

The site is near a variety of amenities such as retail services, education, healthcare facilities, sports and recreational grounds which are outlined below:

Business

Along with the retail opportunities for employment there are numerous businesses and business parks in the surrounds, namely, Clonsaugh Business Park and Malahide Road Industrial Park.

Retail Amenities

The site is located approx. 1.6km away from Clarehall Retail Park which provides a range of convenience shopping, comparison outlets and local services such as banks, post office, restaurants, public houses, and community facilities.

Education & Schools

The surrounding area is well serviced by schools and education facilities such as St Josephs National School, St Francis National School, Coláiste Dhúlaigh CDCFE, Belmayne Educate Together, Darndale Junior School and Our Lady Immaculate SNS. Educational facilities include Dublin City University.

Childcare Facilities

There are a total of 7 Childcare Facilities within 3km of the proposed site.

Medical

The Matter Campus in Belmayne is located approx. 1km away and Beaumont Hospital is located 2.2km away and provides various medical services to the surrounding area and the wider Dublin City and County.

Sports Facilities & Playgrounds

The area is well serviced by sporting facilities which include numerous GAA clubs such as Craobh Chiaran's Pitch Clonshaugh GAA club. The soccer clubs of St Brendans United Football Club and Ayrfield's United FC are located approx. 2km away.

The site is not located within a Conservation Area, nor an Architectural Conservation Area, nor within any archaeological protection area. The site is not located within a flood zone, this has been assessed within the Flood Risk Assessment carried out by

The site is defined in planning terms as a 'brownfield site' having previously been developed. The site is considered to be of low ecological value.

In accordance with the Habitats Directive, an Appropriate Assessment (AA) Screening has been carried out on the project, in relation to any potential impacts upon the Dublin Harbour Special Protection Area [Site No. 004030] and the Great Island Channel Special Area of Conservation [Site No. 001058]. The findings of the AA screening noted that no significant effects on any Natura 2000 sites are likely and it was not necessary to undertake any further stage of the Appropriate Assessment process.

4.3 Type and Characteristics of Potential Impacts

There are likely to be positive and negative potential environmental impacts from the proposed development proceeding, none of which are anticipated to be significant.

The most likely significant positive effects are likely to be a reduction in antisocial behaviour and vandalism, particularly of the two redundant buildings on site which are proposed to be demolished.

A significant benefit of the proposed development is the provision of residential accommodation for the existing and future population for what is a very specific type of housing.

The most likely negative impacts are likely to include the following:

- Very modest increased demand on local amenities and facilities including schools, sports clubs etc
- Construction traffic that may result in traffic congestion on the local road network for a relatively short period
- Modest increase in foul and storm water discharges to the public sewers and local sewage treatment plant

- Modest increased water usage from the proposed development impacting on water supply resources

None of these are considered to be significant given the relatively modest scale of development proposed (9 no. additional residential units).

The following is proposed, or can be provided, by way of mitigation set out below:

- Outline Construction Management Plan and Outline Resource and Demolition Waste Plan
- Provision of landscape screening
- Modest supply of car parking and provision of designated caravan parking
- Traffic management during construction
- Noise and vibration controls during construction
- Air quality monitoring during construction

4.4 Expected Residues and Emission and the production of waste

Residues and emissions from the construction period are related to construction waste and emissions from construction plant. No unusual residues or emissions are expected during the construction period and the Outline Construction Management Plan and Management of Construction and Demolition Waste Plan will mitigate likely impacts of construction works.

No residues are anticipated during the operational phase of development. Emissions will be linked to heating systems and will be within the appropriate standards and regulations for modern residential developments.

Operational waste that will be generated by the proposed development will be domestic in nature and scale. All domestic waste will be disposed of by a licensed waste contractor.

4.5 Use of natural resources including soil, land, water and biodiversity

The application site is defined as 'brownfield' in planning terms and is of low ecological value with minimal ecological habitats present. Use of water will be related modest from the proposed residential units and there are no high generators of water usage or demand within the proposed scheme. Natural resource may be used in the construction phase including stone, gravel and water. There will be no use of natural resources during the operational phase of development.

5.0 ENVIRONMENTAL SCREENING IN ACCORDANCE WITH ANNEX III EU DIRECTIVE 2014/52/EU AND SCHEDULE 7 AND 7A OF THE REGULATIONS

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

As indicated above the criteria set out in Annex III are grouped into three categories:

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

The assessment for this sub threshold development is as follows:

EIA assessment criteria	Construction Impacts	Operational Impacts
1. Characteristics of proposed development The characteristics of the proposed development, in particular:		
(a) The size and design of the whole project	<p>The proposed development comprises demolition of 2 no. existing structures and removal of a number of mobile caravans and provision of some 9 residential units and associated works. The size of the application site is 2.2 ha.</p> <p>The proposed development is consistent with the zoning of the site contained in the Dublin City Council Development Plan 2022-2028. The zoning is Z1 'Sustainable Residential Neighbourhoods'.</p> <p>There will be no significant impact during the construction phase. The construction works are confined to an area of 2.2ha and will be completed within an estimated 2-year period. An Outline Construction and Demolition and Waste Management Plan (OCMP) will be in place for the construction phase.</p>	<p>The proposal is not out of scale or design that would be impactful in a significant manner during the operational period. It is not out of keeping with the scale or design of surrounding development.</p>

	<p>With mitigation measures detailed in the OCMP and Outline Resource and Demolition Waste Plan (ORDWP) in place prior to construction no significant negative impacts are likely during the construction phase.</p>	
<p>(b) Cumulation with other existing and /or proposed development</p>	<p>A search of the Dublin City Council planning register indicates that there are no proposed or recent construction projects in the vicinity of the proposed development.</p> <p>The proposed development has been designed to ensure there will be no adverse impact on the residential amenities of the area. In fact, the amenity of existing residents will be enhanced by the proposed development.</p>	<p>The proposed development is located in a relatively built-up suburban or urban fringe area, near other residential dwellings and estates.</p> <p>The development will connect to existing services.</p> <p>It is not considered likely that the operation of the proposed development will result in significant cumulative environmental impacts with other developments existing or proposed.</p>
<p>(c) The use of natural resources, in particular land, soil, water and biodiversity</p>	<p>Energy, including electricity and fuels, will be required during the demolition and construction phase. Raw materials will be used during the construction process but this usage will not be significant during the construction phase.</p> <p>No significant negative impacts are likely.</p>	<p>Water, consumption of electricity and energy related to the residential occupancy of the completed development.</p> <p>There will be no significant use of natural resources during the operation phase.</p> <p>No significant negative impacts are anticipated.</p>
<p>(d) The production of waste</p>	<p>The construction process will result in some construction related waste. This will be disposed of in compliance with the OCMP and ORDWP that will be in place prior to construction.</p> <p>No significant negative impacts are predicted.</p>	<p>Operational waste generated will be domestic waste from the residential units. All domestic waste will be disposed of by a licensed waste contractor.</p> <p>No significant negative impacts are predicted.</p>
<p>(e) Pollution and Nuisances</p>	<p>There is potential to cause nuisance related to noise, dust and vibration</p>	<p>An Operational Waste Management Plan will be implemented to avoid and /</p>

	<p>impacts. The OCMP and ORDWP detail measures to mitigate likely impacts.</p> <p>The proposed development will be subject to planning conditions limiting construction hours to protect the residential amenity of the area.</p> <p>Implementation of mitigation measures will ensure that no negative impacts are likely during the construction phase.</p>	<p>or mitigate pollution from operational waste. The OCMP and ORDWP focus on Noise and Vibration Control, and Air Quality. Parking is provided on site to prevent traffic congestion and the site is accessible to local bus.</p> <p>With mitigation measures in place no significant negative impacts during operation of the proposed development are predicted.</p>
(f) The risk of major accidents and / or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge	<p>No major accidents are anticipated given the modest scale of development proposed. There will also be strict compliance with building regulations and environmental controls.</p> <p>No significant negative impacts are predicted.</p>	<p>No major accidents or disasters are anticipated. There will also be strict compliance with building and fire regulations with mitigation measures in place, no significant negative impacts are predicted.</p>
(g) The risks to human health (for example due to water contamination or air pollution)	<p>The OCMP and ORDWP detail measures to mitigate any likely impacts associated with noise, dust or pollution from the construction process.</p> <p>With mitigation measures in place no significant negative impacts are anticipated.</p>	<p>The proposed development will be connected to public water and sewer infrastructure. No emissions other than from air conditioning and heating units are anticipated.</p> <p>No significant negative impacts are anticipated.</p>
<p>2. Location of proposed development The environmental sensitivity of geographical areas likely to be affected by proposed development, with particular regard to:</p>		
(a) The existing and approved land use	<p>Residential development proposed is consistent with the zoning of the subject site as ZO 01 Sustainable Residential Neighbourhood. This is brownfield infill site.</p> <p>No significant negative impacts are predicted.</p>	<p>The completed development will provide for residential units and will assist address a local and national housing shortage. The proposed use is compatible with the predominant existing land use in the area.</p>

		No significant negative impacts are anticipated.
(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>This is a brownfield site in a relatively densely developed suburban area. The area is to the south of the R139 is not sensitive in terms of natural resources. There are no sensitive habitats or significant mature trees within or immediately surrounding what is a brownfield site that was previously developed. A search of recent records in the National Biodiversity Datacentre Database (NBDC) has indicated no rare or endangered habitats or species present. In fact there is very low ecological significance applying to this site.</p> <p>No significant negative impacts are predicted.</p>	<p>The proposed operational phase will not have any significant impact on natural resources.</p> <p>No significant negative impacts are predicted.</p>
<p>(c) The absorption capacity of the natural environment, paying attention to the following areas:</p> <p>(i) wetlands, riparian areas, river mouths;</p> <p>(ii) coastal zones and the marine environment;</p> <p>(iii) mountain and forest areas,</p> <p>(iv) nature reserves and parks,</p> <p>(v) areas classified or protected under national legislation, Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive,</p> <p>(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,</p>	<p>Items (i) to (iv) do not apply in this instance. There are no natural environments in close proximity to the site likely to be impacted by the construction of the proposed development.</p> <p>In respect of item (v) AA Screening has been undertaken which concluded that there would be no significant effects on Natura 2000 sites as a result of the proposed development.</p> <p>Item (vi) does not apply in this instance.</p> <p>In respect of (vii) the subject site is within the built-up area and defined development boundary of Dublin City, where there is already substantial existing residential development. There may be some minor disturbance from noise and traffic during construction over a short period of time.</p>	<p>It is not anticipated that there will be any significant impact on any of these items during the operational phase of development.</p>

<p>(vii) densely populated areas, (viii) landscapes and sites of historical, cultural or archaeological significance.</p>	<p>Construction activity will be limited to normal business hours and the noise environment will be governed by relatively high volumes of traffic and consequential noise generated. This will not be significant however. In respect of item (viii) the site is not in proximity to landscapes of historical, cultural or archaeological significance. There are no protected structures within or in proximity to the site.</p> <p>No significant impacts are likely from the construction phase of the development.</p>	
<p align="center">3. Type and Characteristics of Potential Impacts</p> <p>Likely significant effects of projects on the environment must be considered in relation to criteria set out under paragraphs 1 and 2 of this Annex, with regard to the impact of the project on the factors specified in Article 3(1), taking into account:</p>		
<p>The magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected) The nature of the impact</p>	<p>The site size is 2.2ha and it is located in an urban fringe area served by public transport (Bus Routes 15, 27, 42, 43) and a short distance away from Clarehall and the area the subject of the Belmayne Masterplan for substantial future development. Traffic Management will be put in place as per the Management of Construction and Demolition Waste Plan to mitigate negative impacts on traffic flow.</p> <p>With mitigation measures no significant negative impacts are predicted.</p> <p>The construction impacts have potential to cause nuisance associated with noise, dust and traffic but these will be limited, temporal and not significant given the relatively small</p>	<p>The scale of development at 9 units is modest for an urban environment at an appropriate density in an appropriate location on a site that is brownfield and where residential development had previously been commenced but not completed.</p> <p>The proposed density of development is appropriate, given the level of services, amenities, infrastructure and public transport available in the area.</p> <p>The operational phase will result in the development of permanent residential accommodation and ancillary services. The nature of the use is appropriate to the location, to the estate within which the units proposed are located, and proximity to existing facilities and amenities.</p>

	<p>number of units proposed and the limited demolition required to accommodate the proposed development.</p> <p>The OCMP and ORDWP set out stringent mitigation.</p> <p>With mitigation measures in place no significant negative impacts are predicted.</p>	<p>No significant negative impacts are predicted.</p>
<p>The transboundary nature of the impact</p>	<p>There are no construction phase transboundary impacts.</p>	<p>There are no operational phase transboundary impacts.</p>
<p>The intensity and complexity of the impact</p>	<p>The intensity and complexity of the construction phase is not considered significant.</p> <p>No significant negative impacts are predicted.</p>	<p>The operational phase of the development is modest in scale, not intense nor is the impact predicted likely to be complex or significant.</p> <p>No significant negative impacts are predicted.</p>
<p>The probability of the impact</p>	<p>Non-significant construction impact is probable. This will be short term and not significant. Any impacts will be mitigated by the OCMP and ORDWP to be approved prior to construction.</p>	<p>The operational phase will bring probable impact of a non-significant nature. Measures will be put in place to avoid, reduce, or mitigate any likely negative impacts.</p>
<p>The expected onset, duration, frequency, and reversibility of the impact.</p>	<p>Construction and therefore construction impacts will commence within 6 months of the grant of planning permission. The period of construction is likely to be less than 2 years. The construction impacts will be restricted by planning condition in terms of the hours of construction. No permanent or irreversible negative impacts are anticipated as a result of the construction phase. No significant negative impacts are predicted.</p>	<p>The development will be occupied all year round.</p> <p>Impacts which will be non-significant will be irreversible.</p>
<p>The cumulation of the impact with the impact of other existing and / or approved projects;</p>	<p>No other adjacent major construction projects are known or identified which will have an impact cumulatively with the proposed development.</p>	<p>The proposed development is in character with the area and surrounding development.</p>

<p>The possibility of effectively reducing the impact.</p>	<p>The OCMP and ORDWP avoid, reduce and mitigate construction impacts related to noise, dust and traffic during the period of construction which will be relatively short.</p>	<p>The predicted impact is not significant, and the reduction of impacts is neither needed nor proposed in this instance,</p>
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6.0 CONCLUSIONS

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

In relation to the **location of the proposed development**, the site is located within an area substantially developed for the purpose of the subject application. The subject site is removed from any Natura 2000 sites with no pathways, direct or indirect to same. The AA Screening Report accompanying this Part 8 application found that there is no likelihood of any significant effects on any European sites arising from the proposed development, either alone or in combination with other plans or projects.

Characteristics of the potential impacts of the proposed development are unlikely to be significant in this location. Any impact associated with noise, vibration, air, and traffic are likely to be insignificant during the construction and operational phases.

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

In summary, the proposed development has been screened to determine whether an **Environmental Impact Assessment (EIA)** is required, and it has been concluded that there will be no real likelihood of significant effects on the environment arising from the proposed development, either on its own or in combination with other projects, and that an EIA is not required in this instance.