

EIA Screening Report

Proposed Accelerated Social Housing Scheme *Ravel Dunleer*



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1 Introduction

A social residential housing development is proposed at a site on Ravel Dunleer Co. Louth. This site has been earmarked for accelerated delivery of social housing in Co. Louth. Flynn Furney Environmental Consultants Ltd has been engaged by Louth County Council for the provision of an Environmental Impact Assessment Screening Report for the proposed development. This report aims to determine the likely significant effects of the proposed project on the environment and if an Environmental Impact Assessment Report (EIAR) is required.

1.1 EIA Screening Methodology

Screening is the first stage in the EIA process, whereby a decision is made on whether or not EIA is required. EIA requirements derive from the EIA Directive (Directive 2011/92/EU as amended by Directive 2014/52/EU). The amended Directive came into force on 16th May 2017 and regulations transposing it into national legislation have been enacted. No changes to the prescribed project types or thresholds are required under the amended Directive so the types and thresholds set out in the 2001-2010 Regulations remain in effect.

EIA legislation as it relates to the planning process has been largely brought together in Part X of the Planning and Development Acts 2000-2018 and Part 10 and Schedules 5, 6 and 7 of the Planning and Development Regulations 2001-2018. Part 1 of Schedule 5 to the Planning and Development Regulations lists project types included in Annex I of the Directive which automatically require EIA. Part 2 of the same Schedule, lists project types included in Annex II. Corresponding developments automatically require EIA if no threshold is given or if they exceed a given threshold. Developments which correspond to Part 2 project types by are below the given threshold must be screened to determine whether they require EIA or not. This is done by consideration of the criteria set out in Schedule 7.

EIA legislation sets down the types of projects that may require an EIAR. Annex I defines mandatory projects that require an EIAR and Annex II defines projects that are assessed on the basis of set mandatory thresholds for each of the project classes.

The EIA screening exercise initially assesses the development for Mandatory EIA using classifications
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defined in the appropriate legislation. Where no mandatory requirement is concluded, screening advances to sub-threshold development assessment, where the competent authority evaluates whether the project is likely to have a *significant* effect on the environment, with reference to its scale, nature, location and context.

The most recent guidance on Environmental Impact Assessment Screening has been provided by the Office of the Planning Regulator (ORP) 2021.

1.2 Site and Development Description

The Ravel Dunleer site is located on the northern edge of Dunleer village The developable site area is 2.7ha in total, broken into two blocks. The northern block is 2.1ha and the smaller southern block is 0.6ha. To the south of the site is the Scoil Bhride, and to the east is an existing housing estate, The Adree Road runs along the site's western boundary. Pasture-based farmland is found to the north.

The site is currently composed of **Grassy Verge (GS2)** habitat throughout. This was dominated by coarse grasses including Cock's-foot (*Dactylis glomerata*), Bents (*Agrostis spp.*), False Oat-grass (*Arrhenatherum elatius*) and Yorkshire fog (*Holcus lanatus*). The herb layer likely contains mainly tall growing or climbing herbs including common Hogweed (*Heracleum sphondylium*), Bush Vetch (*Vicia sepium*), Thistles (*Cirsium arvense, C. vulgare*) and an abundance of Docks (*Rumex spp.*). Areas of hedgerow around were found along the site's northern boundary and were composed of mostly Ash (*Fraxinus excelsior*), Bramble (*Rubus fruticosus agg*) and Hawthorn (*Crataegus monogyna*).

There are no Natura 2000 designated sites within close proximity to the subject site. The closest is Dundalk Bay SAC and SPA is found 6.7km northwest.

The Ravel Dunleer site is located in a Self-Sustaining Growth Centre as defined in the Louth County Development Plan 2021-2027. Currently the development is proposed to include: The construction of 70no. houses including 9no. 2-bed bungalows, 24no. two storey 2-bed houses, 18no. two storey 3-bed houses, 5no. two storey 4-bed houses, and 2no. 3-bed bungalows, and 12no. sheltered accommodation 2-bed bungalows.

The development will also include the construction of new connections to the existing estate road; EIA Screening 5



provision of new cycleway, footpath, and public lighting along the boundary with the R170; new estate roads and homezones within the site; 123no. car parking spaces including both on-street and in-curtilage parking; cycle parking; hard and soft landscaping including public open spaces, playground, and private gardens; boundary treatments; ESB substation; lighting; laying of underground sewers, mains and pipes; underground pump station and attenuation tank; and all associated works

The developable site area is 2.72 hectares. The proposed development will include 20% public open space.

General works associated with the proposed development include:

- The removal of soil and overburden material
- Connection to services including water, wastewater, stormwater, electricity and broadband, where applicable
- The construction of 70 social housing units
- The installation of SuDS infrastructure including attenuation tanks, oil/ petrol interceptor, bioretention systems/ rain gadrens and tree pits
- Landscaping and;
- All associated site works.

Attenuation tanks will only be used as a last resort where other measures are not feasible. They will be provided on site and will have the capacity for site storage for 1/100 storm and 20% climate change with hydrobrake connection to mains. Petrol/ oil interceptors will be included in the overall drainage design. Bio-retention systems/ rain gardens and tree pits will be included in the landscape design but are not included in SuDS calculation due to impermeable ground conditions and poor infiltration however they will still contribute to overall SuDS.





Dunleer Accelerated Social Housing Scheme

Client: Louth County Council

Legend

Dunleer Location
Watercourses



Prepared by: Lauren Woods Date: 21/03/2023 Version: 2 Project: Dunleer Accelerated Social Housing Imagery from: Google

Disclaimer: This map has been prepared in accordance with the scope of services described in the contract or agreement between Flynn Furney Environmental Consultants and the Client. Any findings only apply to the aforementioned circumstances an no greater reliance should be assumed or drawn by the Client.

Figure 1 Overview of the site, local water courses and the site's local context





Figure 2 Proposed site layout provided by EML Architects



2 Screening Assessment

EIA legislation sets down the types of projects that may require an EIAR. Annex I defines mandatory projects that require an EIAR and Annex II defines projects that are assessed on the basis of set mandatory thresholds for each of the project classes.

The EIA screening exercise initially assesses the development for Mandatory EIA using classifications defined in the appropriate legislation. Where no mandatory requirement is concluded, screening advances to sub-threshold development assessment, where the competent authority evaluates whether the project is likely to significantly affect the environment, with reference to its scale, nature, location and context.

2.1 Mandatory EIA Screening Assessment

The subject development does not fall within the development classes set out in Part 1 of Schedule 5. The following development classes included in Part 2 of Schedule 5 are relevant to the development proposal;

10. Infrastructure Projects;

b) (i) Construction of more than 500 dwellings

(iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere. (In this paragraph, "business district" means a district within a city or town in which the predominant land use is retail or commercial use).

The proposed development does not trigger a requirement for a mandatory EIA for the following reasons;

- 10 a (iii) The project will not comprise the construction of 500 dwelling units. Currently 70 units are proposed.
- (iv) The footprint of the site is circa. 2.7 hectares. The site is not within a built-up area and is therefore well below the threshold of 20 ha.



2.2 Sub-threshold EIA Screening Assessment

In cases where a project is mentioned in Part 2 but is classed as "sub-threshold development", it is necessary for a planning authority to undertake a case-by-case examination about whether the development is likely to be associated with significant effects on the environment.

While it is demonstrated above that the subject proposal does not trigger mandatory EIA, it is considered prudent to establish that the proposed development would not be likely to have significant effects on the environment and by extension would not require a sub-threshold EIA.

Schedule 7 of the Planning and Development Regulations 2001, sets out the criteria for determining whether a development would, or would not be likely to have significant effects on the environment, and this was transposed directly from Annex III of the 2011 Directive. These criteria are defined as follows:

- 1. Characteristics of the proposed development;
- 2. Location of the proposed development, in terms of the environmental sensitivity of geographical areas likely to be affected by the proposed development;
- 3. Characteristics of the proposed impacts, in terms of the potential significant effects of the proposed development.

This screening assessment uses the checklist provided in the 'Environmental Impact Assessment of Projects, Guidance on Screening (Directive 2011/92/EU as amended by 2014/52/EU)' (EC, 2017).

2.3 Characteristics of the Proposed Development

Table 1: Review of characteristics of the Proposed Development

| Screening Questions | |
|-----------------------------|---------|
| Characteristics of the | Comment |
| Proposed Development | |
| | |



| Is the scale of the project | The scale of the proposed development is in keeping with the scale of the |
|-----------------------------|--|
| considered to be | receiving setting and surrounds in terms of size and design, and is therefore |
| significant? | not considered significant. |
| | |
| Is the size of the project | |
| considered significant | No permitted or proposed projects were identified which in combination |
| when considered | with the proposed development would give rise to significant cumulative |
| cumulatively with other | impacts. |
| adjacent developments? | |
| | |
| | No. The footprint of the proposed development will occupy a small area; |
| | 2.72ha. No significant impacts to land or land area will occur. |
| | Soil and overburden material will be removed from the site to allow the |
| | |
| | construction of the residential units and associated site infrastructure. Also |
| | required will be the installation of site services including water, |
| | wastewater, electricity and broadband. |
| Will the project utilise a | Excavation or earthworks requirements are not considered to constitute a |
| | significant effect. |
| significant quantity of | |
| natural resources, in | The total developable site area is approximately 2.72ha, a proportion of |
| particular land, soil, | which will be retained as public spaces and green areas reducing the |
| water or biodiversity? | footprint of the site's hardstand area. Given the size and nature of the |
| | proposed development, this project will not constitute a significant effect |
| | on natural resources. |
| | |
| | No water will be abstracted from any watercourses during the construction |
| | or operation of this development. Storm water collected from the local |
| | area including around the site will be discharged into a drainage ditch to |
| | north of site. While possible minor localised water quality impacts may |
| | exist during the construction period no significant adverse lasting impacts |
| | and alling the construction period no significant adverse rusting impacts |



| | are predicted that could trigger an EIAR. |
|--|---|
| | The site is currently a green field site composed of grassy verge habitat. No habitats of higher than low local significance were found within the subject site. In addition, no protected species were found within the subject site. Possible impacts to the European Designated site were assessed during an Appropriate Assessment Screening Report for the proposed development (FFEC, 2024). This concluded that the proposed development individually/in combination with other plans and projects (either directly or indirectly) is not likely to have any significant effects on nearby designated sites. Therefore, progression to Stage 2 Appropriate Assessment is not required. |
| Will the project produce a significant quantity of waste? | During the construction phase, normal construction waste will be produced, segregated where possible and sent to an appropriately permitted waste or materials recovery facility. The waste management hierarchy will be implemented onsite, which prioritises prevention and minimisation of waste, followed by reuse and recycling. During the operational phase, waste will be sorted and collected by a suitably licensed contractor and sent to an appropriately permitted waste or materials recovery facility. |
| Will the project create a significant amount or type of pollution? | No significant water or air-borne pollution is envisaged. The proposed development is not a project type that will give rise to significant emissions or pollution. |
| Will the project create a significant amount of nuisance? | Limited disruption to local receptors may arise during the construction phase but this will be short-term in duration. |
| Will there be a risk of | The proposed development is not of a type that poses a risk of major |



| major accidents? | accidents, having regard to substances or technologies used. The proposed |
|---|--|
| major accidents: | construction works will employ best practice methodologies, and be subject to the contractor's safety statements and risk assessments. |
| Will there be a risk of natural disasters, including those caused by climate change? | Based on flood analysis data from Floodinfo.ie the site is not within an area prone to flooding. In terms of fire risk, the proposed development will comply with all relevant health and safety legislation. It is considered that the risk of significant fire occurring, affecting the proposed development and causing it to have significant environmental effects, is limited. |
| Will there be a risk to human health (for example due to water contamination or air pollution)? | There is limited potential for negative effects on human health during the construction phase as a result of potential emissions to air, or the potential emissions to land and water. Best construction site practices will prevent any risk of pollution running off the site. A housing development is not a recognised source of pollution and is not an activity that falls within any thresholds requiring Environmental Protection Agency licensing. On this basis, the potential for negative health effects associated with the proposed development is negligible. |
| Is the combination of the above factors likely to have significant effects on the environment? | There are no factors above which when combined would result in any significant effect on the environment. |



2.4 Potential Impacts by EIA Topic

Table 2: Review of potential impacts of the proposed development by EIA topic

| Topic | Comment |
|--|---|
| Population and Human Health | The lack of any sensitive habitats and/or species within the site boundary means that the proposed development will not have any significant effects on flora and fauna. Possible impacts to the designated sites were also assessed. It was concluded that no potential for the proposed development to impact upon any designated site exists (FFEC, 2023). |
| Biodiversity / Species and Habitats | The lack of any sensitive habitats and/or species within the site boundary means that the proposed development will not have any significant effects on flora and fauna. Possible impacts to the designated sites were also assessed. It was concluded that no potential for the proposed development to impact upon any designated site exists (FFEC, 2023). |
| Land and soils | No significant impact; the development will be constructed in accordance with best practice environmentally sensitive methods and environmental management systems. |
| Water | Good construction site practices and direct avoidance and mitigation will be in place to prevent any risk of pollution, e.g. from earthmoving works or chemicals used in construction such as hydrocarbons and cement-based products, running off the site. With best practices incorporated into the design and the construction works, the potential for significant run-off of pollutants is either eliminated or greatly reduced, and no significant residual impacts on water are anticipated. The proposed development will connect to the existing sewer, eliminating the requirement for onsite wastewater treatment facilities. |



| | Storm water into stream? SUDS? |
|---------------------------------------|--|
| Air & Climate | During construction, there is the potential for short-term minor negative impacts related to dust to occur, however, this will be short-term in duration and limited to the works area. Best practice construction site management will minimise emissions. |
| Noise & Vibration | Potential short-term noise impacts may arise during construction activities however this will be managed through best practice measures. No significant impacts are anticipated. |
| Material Assets: Built Environment | The proposed development will connect to existing public services (foul and water mains and utilities). There are no issues with capacity in the existing services. Possible effects include short-term interruption to existing services, damage to existing systems during construction and possible pollution within storm water drains during construction. No significant impact that could trigger the requirement for an EIAR is predicted. |
| Material Assets: Transportation | There will be no significant long-term impacts on local traffic movements due to the scale of the proposed housing development. During the construction phase, appropriate traffic management and signage will be in place to ensure safe access and egress from the site, and the safety of other road users. |
| Waste Management | The development will involve limited excavation and land re-shaping. Possible effects include the re-use / recycle / disposal of excavated material as well as other waste generated on-site i.e. construction and demolition waste, and domestic waste once occupied. Any effects will be mitigated by the implementation of best practices in construction and demolition and operational waste management procedures. |



| Cultural Heritage | The proposed development will not give rise to any significant impacts on cultural heritage. |
|-------------------|--|
| Landscape | No significant impact. The proposed housing development is located within an urban area and will not give rise to any significant landscape or visual impacts that could trigger the requirement for EIAR. |

3 Conclusion

The proposed project is not a development for which an EIA is mandatory. In terms of scale, the proposed housing development falls significantly below the threshold set out in Class 10 (b)(i) in Part 2 of Schedule 5 of the Regulations.

A sub-threshold EIA Screening exercise was carried out to determine the potential for the proposed development to have significant environmental effects or not.

No significant negative effects on the environment have been identified during the construction or operational phase of the proposed development. The overall conclusion of this screening exercise is that there should be no specific requirement for a full Environmental Impact Assessment of the proposed development.



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