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ENVIRONMENTAL CONSULTANTS

EIA Screening Report

Proposed Accelerated Social Housing Scheme
Ballymakenny West

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1 Introduction

A social residential housing development is proposed for a site in Ballymakenny West Drogheda 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

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 Ballymakenny West site is located on Ballymakenny Road on the northern edge of Drogheda. The site is currently croplands surrounded by hedgerows to the West and Northwest. Adjacent to the south and west of the site are further housing developments. To the north is the McCloskey's Bakery and to the east is the Ballymakenny Road and Ballymakenny College. No sensitive ecological receptors were noted within or directly adjacent to the subject site. The closest receptor is the Tullyeskar River which is found 70m from the site north western boundary. The closest European designated site is the River Boyne and Blackwater SAC which is 1.6km south of the subject site.

The proposed development site is composed entirely of **Arable Land (BC1)** at the time of surveys these lands were growing Maize. Hedgerows around found around the western and northwestern site boundaries. Hedgerows were dominated by Hawthorn (*Crataegus monogyna*) and Butterfly-bush (*Buddleja davidii*) with Bramble (*Rubus fruticosus agg*), Ivy (*Hedera helix*), Dog-rose (*Rosa canina*) and Hedge Bindweed (*Calystegia sepium*) abundant throughout. A large bank (**GS2 – Grassy verge**) separates the subject site from the Ballymakenny Road this was vegetated with Rape (*Brassica napus*) and lesser amounts of Black Medick (*Medicago lupulina*), Hogweed (*Heracleum sphondylium*) and Thistles (*Cirsium arvense*, *C. vulgare*). An area of fallow ground (**GS2 – Grassy verge**) is found along the site's northwest boundary. Here Rape, Oats, Redshank (*Persicaria maculosa*), Hedge Woundwort (*Stachys sylvatica*), Cock's-foot grass (*Dactylis glomerata*) and Meadow Fox-tail (*Alopecurus pratensis*) were recorded.

The Ballymakenny West site is located in a Regional Growth Centre as defined in the Louth County Development Plan 2021-2027. Currently, the development is proposed to include:

The construction of 97no. houses including 12no. 2-bed bungalows, 40no. two storey 2-bed houses, 30no. two storey 3-bed houses, 13no. two storey 4-bed houses, and 2no. 3-bed bungalows.

The development will also include the construction of a new entrance onto the Ballymakenny Road; provision of new cycleway, footpath, and public lighting along the Ballymakenny Road; new estate roads and homezones within the site; 120no. 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 tanks; and all associated works.

The site area is 2.93 hectares and the density is 33 dwellings per hectare. The proposed development will also include 14.5% 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 97 social housing units
- The installation of SuDS infrastructure including attenuation tanks, petrol/ oil interceptors, bio-retention systems/ rain gardens 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.

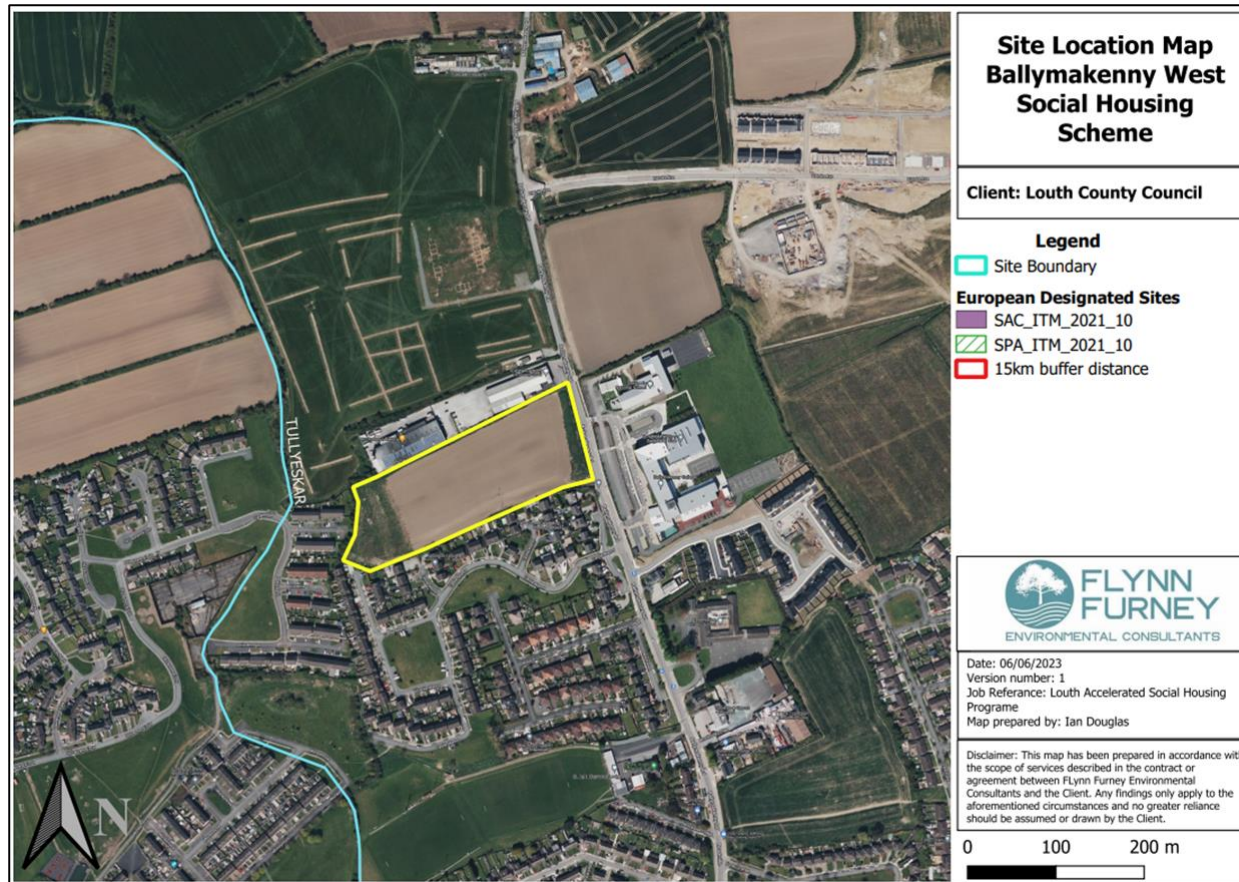


Figure 1 Overview of the site, local water courses and the site's local context



Figure 2 Proposed site layout at the Ballymackenny West site 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, 105 units are proposed.
- (iv) The footprint of the site is circa. 2.8 hectares. The site is not within a built-up area and is therefore well below the threshold of 10ha.

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	Comment
Characteristics of the Proposed Development	
Is the scale of the project considered to be significant?	The scale of the proposed development is in keeping with the scale of the receiving setting and surrounds in terms of size and design, and is therefore not considered significant.
Is the size of the project considered significant when considered cumulatively with other adjacent developments?	No permitted or proposed projects were identified which in combination with the proposed development would give rise to significant cumulative impacts.
Will the project utilise a significant quantity of natural resources, in particular land, soil, water or biodiversity?	<p>No. The footprint of the proposed development will occupy a small area; of 2.93ha. No significant impacts to land or land area will occur.</p> <p>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.</p> <p>Excavation or earthworks requirements are not considered to constitute a significant effect.</p> <p>The total site area is approximately 2.93ha, a proportion of which will be retained as public spaces and green areas reducing the 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</p>

	<p>resources.</p> <p>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 directed into the site's local drainage network via a SuDS, tree pits and fuel interceptor. While possible water quality impacts may exist during the construction period. No significant adverse lasting impacts are predicted that could trigger an EIAR.</p> <p>The site is currently a greenfield site composed of arable crops, fallow grassland and hedgerows. No habitats of higher than high local significance (hedgerows) 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.</p>
<p>Will the project produce a significant quantity of waste?</p>	<p>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.</p> <p>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.</p>

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 major accidents?	The proposed development is not of a type that poses a risk of major accidents, having regard to substances or technologies used. The proposed 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	There are no factors above which when combined would result in any

have significant effects on the environment?	significant effect on the environment.
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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	<p>The potential impacts of the construction phase on human beings are not considered to be significant. During construction, there is the potential for temporary minor impacts related to traffic inconvenience, dust and noise. However, the work will be short-term in duration.</p> <p>Standard best practice construction methodologies will limit disturbance to people in the area. Once completed, the proposed development will provide additional housing stock in an area of high demand which is considered a significant positive impact.</p>
Biodiversity / Species and Habitats	<p>No. The site was surveyed by FFEC Ecologists as part of survey works for an Appropriate Assessment Screening Report (FFEC, 2024) and Alien Invasive Species Survey (FFEC, 2024) for the proposed development.</p> <p>It was concluded that the proposed development will not result in any significant effects on the flora and fauna of the existing environment. No habitats of higher than high local ecological value were found within the subject site. The subject site was not found to support any protected flora or fauna. No rare, threatened, or protected species of plants as per the Red Data List (Wyse Jackson et al., 2016) were found. No species listed in the Flora Protection Order (2015) were found to be growing within the site.</p>

	<p>No Third Schedule or high-impact invasive species were found within or surrounding the proposed development site.</p> <p>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).</p>
Land and soils	No significant impact; the development will be constructed in accordance with best practice environmentally sensitive methods and environmental management systems.
Water	<p>No watercourses are found within or with connectivity to the proposed development site.</p> <p>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.</p> <p>The proposed development will connect to the existing sewer, eliminating the requirement for onsite wastewater treatment facilities.</p>
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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