

Environmental Impact Assessment Screening Report

for proposed

Social Housing Infill at Roebuck Road, Clonskeagh, Co. Dublin

for: Dún Laoghaire Rathdown County Council

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1ST APRIL 2021

Document Control

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checked by	Conor Skehan	1 st April 2021
status	For issue as final, subject to any comments from DLRCC	

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1. Introduction

CAAS has been appointed by Dún Laoghaire Rathdown County Council to prepare this Environmental Impact Assessment Screening Report for a proposed social housing infill development at Roebuck Road, Clonskeagh, Co. Dublin. This report has been prepared to form an opinion as to whether or not the proposed development should be subject to Environmental Impact Assessment (EIA) and if so, whether an Environmental Impact Assessment Report (EIAR) should be prepared in respect of it.

The screening assesses the proposed development with reference to the EIA legislation¹ including the EIA Directive, and Planning and Development legislation. It also has regard to relevant parts of *EIA Guidance for Consent Authorities regarding sub-threshold development*, 2003, Department of the Environment, Heritage and Local Government and *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment*, 2018, Department of Housing, Planning and Local Government and relevant EU Guidance including *Interpretation of definitions of project categories of annex I and II of the EIA Directive*, 2015, EU and *Environmental Impact Assessment of Projects - Guidance on Screening*, 2017, EU.

The consideration of potential impacts covers all significant direct, indirect and secondary impacts as relevant, with reference to the guidance and in compliance with the legislation, including the criteria for determining whether certain development types should be subject to EIA, and which are grouped into these categories in the Directive:

- (i) Characteristics of the proposal
- (ii) Location of the proposal
- (iii) Characteristics of potential impacts

Where used, descriptions of impacts follow the statutory EPA (draft) *Guidelines on the information to be contained in Environmental Impact Assessment Reports* (2017). For ease of reference, these standardised descriptions are reproduced in Appendix I of this report.

Information on the development has been obtained from Dún Laoghaire Rathdown County Council including a brief written description and relevant drawings.

The following sections of this report cover:

- The proposed development (s2)
- The legislative basis for EIA (s3)
- Screening considerations (s4)
- Conclusion (s5)

An overview of the author's competency is provided in Appendix II.

¹ see section 3 for details

2. The proposed development

2.1 Overview of the development and context

The proposed development involves the construction of four housing units. The site, approx. 0.07ha in area, is an infill site at the junction of Roebuck Road and White Oaks Access Road in Clonskeagh, Dublin 14.

The site is bounded by residential dwellings to the north and north-west and by the Roebuck Road regional road to the east. Further East is characterised by residential dwellings. South and south-west of the site is location to a school, a place of worship and a disused garage. The northern periphery of the site is bounded by an open drain.

2.2 Project details

The proposed development includes:

- Construction of 2 no. 4-bed/7 person 2-storey houses, with approx. floor area of 120 m².
- Construction of 2 no. 1-bed/ 2 person apartments with approx. floor area of 55 m².
- Provision of 6 no. new on street car parking spaces along White Oaks Road.
- Development of a small landscaped area to the front of the development.
- Strengthening of existing site boundary hedgerows where appropriate.
- Associated ancillary works.

The site is approx. 0.07 ha in area.

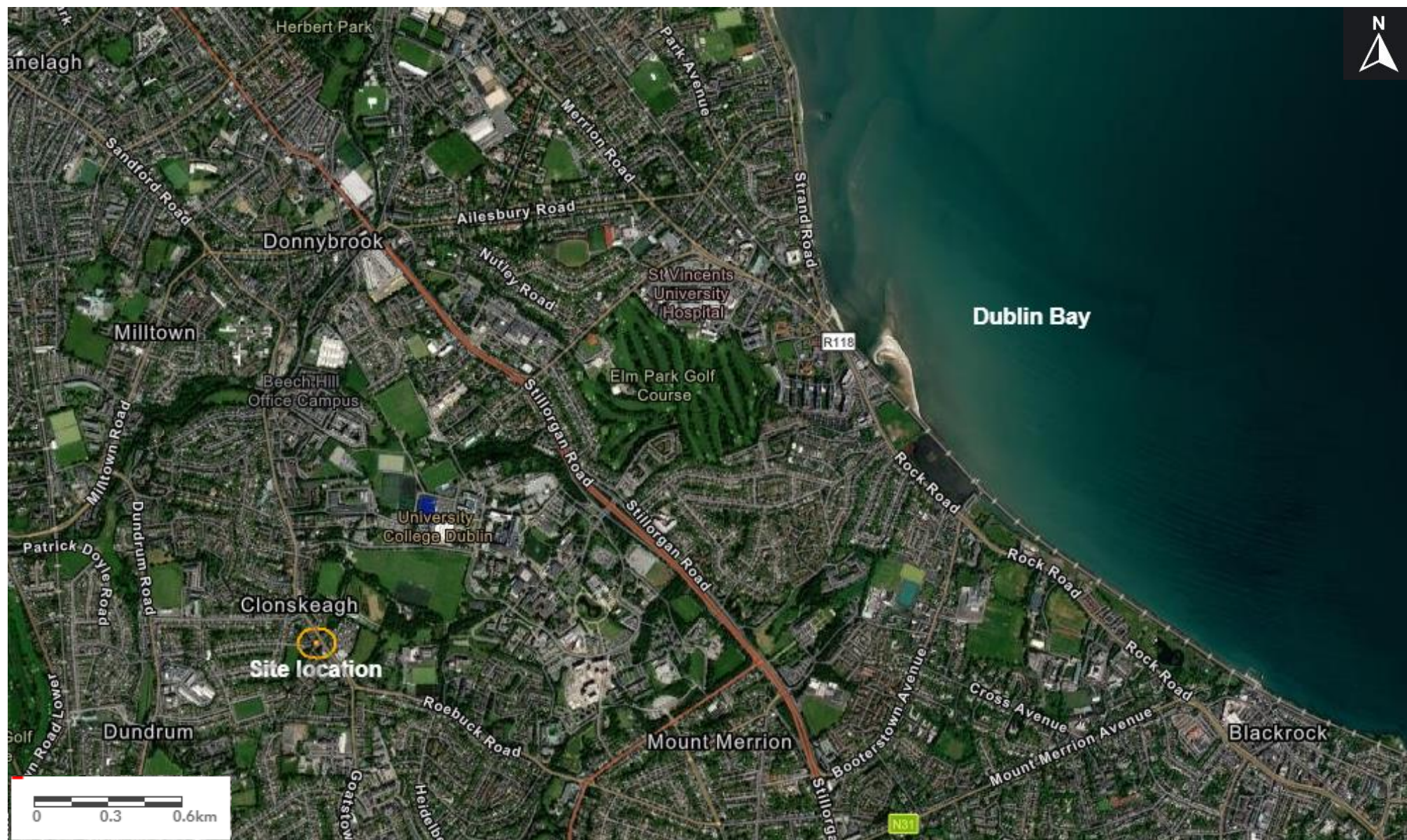


Figure 1 - Site location map

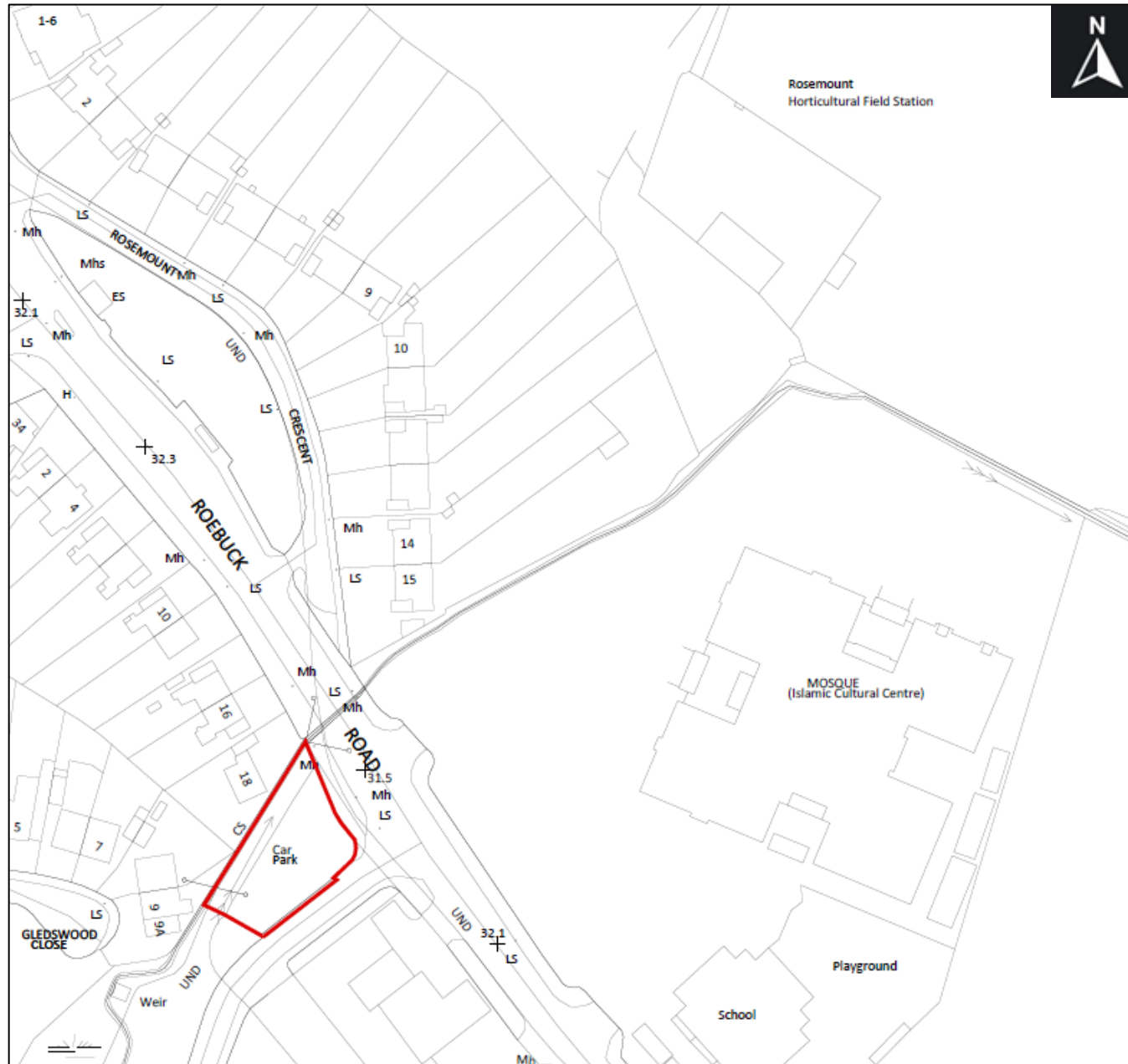


Figure 2 - Site boundary showing environs





Figure 4 – Elevations of proposed housing



Figure 5 - Digital layout of the proposed development

3. Legislative basis for EIA

EIA requirements derive from EU Directive 2011/92/EU (as amended by Directive 2014/52/EU) on the assessment of the effects of certain public and private projects on the environment. The Directive has been transposed into various Irish legislation of which the following are the most relevant to this development.

- The Planning and Development Acts 2000-2020 (Part X), as amended by, *inter alia*, the:
 - Planning and Development Regulations 2001 (S.I. 600/2001)
 - European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018) (S.I. 296/2018)

Part 1 of Schedule 5 of these regulations lists projects included in Annex I of the Directive which automatically require EIA.

For projects included in Annex II of the Directive, Part 2 of Schedule 5 provides thresholds, above which EIA is required.

4. Screening considerations

4.1 Project type

In the first instance it is necessary to determine whether the project is of a type that requires EIA.

Potentially relevant project types prescribed for EIA purposes in the Planning and Development legislation are listed in the table below, with commentaries of their applicability to the proposed development. Criteria prescribed in the legislation for changes or extensions are included.

Project type / criteria	Comment	Is EIA required on this basis?
Planning and Development legislation S.I. 600/2001, Schedule 5, Pt 2		
Project type 10. <i>Infrastructure projects (b) (i)</i>		
<i>Construction of more than 500 dwelling units</i>	The proposal is for 4 dwelling units. This is 0.8% of the threshold number of dwelling units.	No

4.1 Subthreshold development

Article 92 of the Regulations of 2001, as amended define: 'sub-threshold development' as:

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

Annex III of the EIA Directive (2011/92/EU, as amended) as transposed into Schedule 7 of the Planning and Development Regulations - sets out criteria for review of sub-threshold projects to determine if they should be subject to EIA. These criteria include characteristics, location and potential impacts.

As the proposed development does fall into a project type prescribed in Part 2 of Schedule 5 it is considered to comprise 'sub-threshold development'. Therefore, it is required to review it against the Schedule 7 criteria.

4.2 Review against Schedule 7 criteria

These criteria cover:

1. Characteristics of the proposed development
2. Location of the proposed development
3. Types and characteristics of potential impacts

The criteria are listed in the table below. The comments provided in relation to the category 1 and 2 criteria are factual and do not comment on the types or characteristics of impacts. In keeping with

the intent of Schedule 7, commentary on impacts is provided in response to the items covered by category 3 (in the third part of the table below). All comments, particularly regarding 'significance', are made in the context of the Directive and guidance. Cross references are included where useful. The review against the Schedule 7 criteria takes account of the environmental factors set out in of Schedule 6 (2(d)), as relevant.

Schedule 7A of the Planning and Development Regulations sets out 'Information to be provided by the Applicant or Developer for the Purposes of Screening Sub-threshold Development for Environmental Impact Assessment'. This information includes:

1. A description of the proposed development
2. A description of the aspects of the environment likely to be significantly affected by the proposed development.
3. A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment
4. The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7.

This screening report includes the relevant Schedule 7A information. This is contained in s2 above and in the commentary provided in the table below.

Schedule 7 Criteria	Commentary
1. Characteristics of Proposed Development The characteristics of proposed development, in particular:	
(a) the size and design of the whole of the proposed development	The site covers approx. 0.07ha . The proposed development will be 3 and 2 storeys in height.
(b) cumulation with other existing development and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment	The context of the site is largely residential in nature, with a school, a place of worship and a disused garage located in the immediate area. A number of small scale developments have been granted planning permission and/or built in adjacent properties in recent years, including house extensions or change of use of property.
(c) the nature of any associated demolition works	There are no demolition works proposed.
(d) the use of natural resources, in particular land, soil, water and biodiversity	No significant natural resources will be used.
(e) the production of waste,	Waste generated during construction and operation can be anticipated to be typical for a small scale residential development. No significant waste streams will be generated.

(f) pollution and nuisances,	During demolition and construction, the proposed scheme is likely to generate localised and short-term noise and dust. It will also generate traffic. When occupied, it can be anticipated to have negligible potential to cause any pollution or nuisance.
(g) the risk of major accidents, and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge	No significant risks.

2.Location of proposed development The environmental sensitivity of geographical areas likely to be affected by the proposed development, with particular regard to—	
(a) the existing and approved land use	The existing land use is largely residential in nature, with a school, a place of worship and a disused garage located in the immediate area.
(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground	Due to the scale of the proposed development and its location in a developed residential and suburban context, the impact on natural resources in the area will be minimal.
(c) the absorption capacity of the natural environment, paying particular attention to the following areas:	
(i) wetlands, riparian areas, river mouths	-
(ii) coastal zones and the marine environment	-
(iii) mountain and forest areas	-
(iv) nature reserves and parks	-
(v) areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive	-
(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.	-
(vii) densely populated areas	The environs are predominantly low-density suburban residential.
(viii) landscapes and sites of historical, cultural or archaeological significance	-

3. Types and characteristics of potential impacts The likely significant effects on the environment of proposed development in relation to criteria set out under paragraphs 1 and 2, with regard to the impact of the project on the factors specified in paragraph (b)(i)(I) to (V) of the definition of 'environmental impact assessment report' in section 171A of the Act, taking into account—	
(a) the magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected)	The site covers 0.07ha (figures are approximate) and no significant effects are likely to extend beyond the site boundary
(b) the nature of the impact	Temporary to short term localised construction phase impacts are likely. These are likely to be small scale and localised.
(c) the transboundary nature of the impact	-
(d) the intensity and complexity of the impact	Construction phase impacts will be temporary to short term and of low intensity and complexity.
(e) the probability of the impact	Temporary to short term construction phase impacts are likely to occur. These are not likely to be significant, within the meaning of the Directive.
(f) the expected onset, duration, frequency and reversibility of the impact	Construction phase impacts will commence at start of construction, be of varying frequency and can be anticipated to be slight and temporary to short term. Once completed effects will be insignificant, long term to permanent and non-reversible unless the units are demolished again.
(g) the cumulation of the impact with the impact of other existing and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment	On the basis of their nature and scale, when considered in-combination with the proposed development, potential to cause significant cumulative impacts can be considered to be negligible.
(h) the possibility of effectively reducing the impact	Not relevant as significant effects are considered unlikely to occur.

Based on review against the Schedule 7 criteria, the environmental impacts of the proposal can be anticipated to be temporary to short term and not likely to be significant within the meaning of the Directive.

5. Conclusions

It is considered that the proposed residential development at Roebuck Road, Clonskeagh in Co. Dublin does not need to be subject to Environmental Impact Assessment and no Environmental Impact Assessment Report is required for it.

This conclusion is based on an objective review of the proposed development, including its characteristics, location and the likelihood of it causing significant environmental impacts. The screening has followed the relevant legislation and has had regard to the relevant guidance.

Appendix I – Standard Descriptions of Effects

(from *Guidelines on the information to be contained in Environmental Impact Assessment Reports*, 2018 draft, EPA)

Quality of Effects It is important to inform the non-specialist reader whether an effect is positive, negative or neutral	Positive Effects A change which improves the quality of the environment (for example, by increasing species diversity; or the improving reproductive capacity of an ecosystem, or by removing nuisances or improving amenities).
	Neutral Effects No effects or effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error.
	Negative/adverse Effects A change which reduces the quality of the environment (for example, lessening species diversity or diminishing the reproductive capacity of an ecosystem; or damaging health or property or by causing nuisance).
Describing the Significance of Effects "Significance" is a concept that can have different meanings for different topics – in the absence of specific definitions for different topics the following definitions may be useful (also see <i>Determining Significance</i> below.).	Imperceptible An effect capable of measurement but without significant consequences.
	Not significant An effect which causes noticeable ² changes in the character of the environment but without significant consequences.
	Slight Effects An effect which causes noticeable changes in the character of the environment without affecting its sensitivities.
	Moderate Effects An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends.
	Significant Effects An effect which, by its character, magnitude, duration or intensity alters a sensitive aspect of the environment.
	Very Significant An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment.
	Profound Effects An effect which obliterates sensitive characteristics
Describing the Extent and Context of Effects Context can affect the perception of significance. It is important to establish if the effect is unique or, perhaps, commonly or increasingly experienced.	Extent Describe the size of the area, the number of sites, and the proportion of a population affected by an effect.
	Context Describe whether the extent, duration, or frequency will conform or contrast with established (baseline) conditions (is it the biggest, longest effect ever?)

Describing the Probability of Effects Descriptions of effects should establish how likely it is that the predicted effects will occur – so that the CA can take a view of the balance of risk over advantage when making a decision.	Likely Effects The effects that can reasonably be expected to occur because of the planned project if all mitigation measures are properly implemented.
	Unlikely Effects The effects that can reasonably be expected not to occur because of the planned project if all mitigation measures are properly implemented.
Describing the Duration and Frequency of Effects 'Duration' is a concept that can have different meanings for different topics – in the absence of specific definitions for different topics the following definitions may be useful.	Momentary Effects Effects lasting from seconds to minutes
	Brief Effects Effects lasting less than a day
	Temporary Effects Effects lasting less than a year
	Short-term Effects Effects lasting one to seven years.
	Medium-term Effects Effects lasting seven to fifteen years.
	Long-term Effects Effects lasting fifteen to sixty years.
	Permanent Effects Effects lasting over sixty years
	Reversible Effects Effects that can be undone, for example through remediation or restoration
	Frequency of Effects Describe how often the effect will occur. (once, rarely, occasionally, frequently, constantly – or hourly, daily, weekly, monthly, annually)
Describing the Types of Effects	Indirect Effects (a.k.a. Secondary Effects) Impacts on the environment, which are not a direct result of the project, often produced away from the project site or because of a complex pathway.
	Cumulative Effects The addition of many minor or significant effects, including effects of other projects, to create larger, more significant effects.
	'Do-Nothing Effects' The environment as it would be in the future should the subject project not be carried out.
	'Worst case' Effects The effects arising from a project in the case where mitigation measures substantially fail.
	Indeterminable Effects When the full consequences of a change in the environment cannot be described.

	Irreversible Effects When the character, distinctiveness, diversity or reproductive capacity of an environment is permanently lost.
	Residual Effects The degree of environmental change that will occur after the proposed mitigation measures have taken effect.
	Synergistic Effects Where the resultant effect is of greater significance than the sum of its constituents, (e.g. combination of SO _x and NO _x to produce smog).

Appendix II - Competency of Author

The lead author, Paul Fingleton, has an MSc in Rural and Regional Resources Planning (with specialisation in EIA) from the University of Aberdeen. Paul is a member of the International Association for Impact Assessment as well as the Institute of Environmental Management and Assessment. He has over twenty-five years' experience working in the area of Environmental Assessment. Over this period, he has been involved in a diverse range of projects including contributions to, and co-ordination of, numerous complex EIARs and EIA screening reports. He has also contributed to and supervised the preparation of numerous AAs and AA screenings.

Paul is the lead author of the current EPA Guidelines² and accompanying Advice Notes³ on EIARs. He has been involved in all previous editions of these statutory guidelines. He also provides a range of other EIA related consultancy services to the EPA. Paul is regularly engaged by various planning authorities and other consent authorities to provide specialised EIA advice.

² *Guidelines on the information to be contained in Environmental Impact Assessment Reports*, EPA, 2017 (Draft)

³ *Advice notes on current practice in the preparation of Environmental Impact Assessment Reports*, EPA, 2003