



ENVIRONMENTAL IMPACT ASSESSMENT SCREENING STATEMENT

In respect of

LANDS AT MILL STREET, MAYNOOTH

Prepared by

GENESIS PLANNING CONSULTANTS

On behalf of

**Ladas Property Company
(as part of The Comer Group)**

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1 INTRODUCTION

- 1.1 On behalf of the applicant, Ladas Property Company (as part of the Comer Group), we have prepared this Environmental Report to assess the potential impacts of the proposed development on the environment.
- 1.2 The development will consist of the construction of 120 no. apartments, a crèche, restaurant and 3no. office units along with ancillary car parking and site works on a site of 1.05 hectares.
- 1.3 This report will accompany the SHD planning application. The possible effects on the environment has been examined through the process of an EIA screening which is set out below.
- 1.4 This report is submitted in response to Sections 9 & 11 of the SHD planning application form which requests that a statement be submitted identifying the potential impacts of the proposed development on the environment.

2 SITE DESCRIPTION & CONTEXT

- 2.1 The site comprises approximately 1.05ha located in a strategically important location in the centre of Maynooth Town, Co. Kildare.
- 2.2 In terms of local context, the site is adjacent to St Marys Church (protected structure) and directly opposite is the apartment and retail development known as 'Manor Mills'. To the north and north-east the lands are bounded by a mixture of open grounds whilst to the south-eastern boundary the Lyreen River passes. Adjacent and south-west is an existing apartment complex.
- 2.3 In respect of site features, hard-core surfacing is laid within the site, as a result of site excavation works pursuant to a previous planning permission. Existing ground levels consequently slope downwards 'into' the site from Mill Street and the site is low lying relative to adjoining lands.
- 2.4 Existing vegetation within the site is predominantly saplings which have developed in recent years, by virtue of previous site excavation works carried out. Various conifer trees occupy a portion of the northern and north-eastern boundaries. An area of grassland exists along the roadside portion of the site.
- 2.5 Boundaries to the roadside and alongside the party boundary with St Mary's Church are defined by an existing stone wall, with associated access point directly onto Mill Street to serve the lands as existing. The Lyreen River passes along the south-eastern boundary, while the northern and north-eastern boundaries are bounded by existing third party lands.

3 DESCRIPTION OF PROPOSED DEVELOPMENT

- 3.1 The proposed residential development provides for 4no. separate blocks comprising 120 no. new residential apartments on a site directly adjoining the existing residential areas of Mill Street.
- 3.2 In terms of apartments, the residential aspect of development comprises:
- 43no. one bed apartments;
 - 70no. two bed apartments and
 - 7no. three bed apartment units.
- 3.3 In addition, the proposed development provides a childcare facility along with a separate restaurant unit to the street frontage and 3no. office units.
- 3.4 Access to the proposed development is directly from Mill Street which will facilitate new vehicular access to the application site.
- 3.5 Pedestrian/cycle pathway and linkages to the proposed development will also be provided from Mill Street. Parking provision within the site will be at basement level.
- 3.6 For further detail on the proposal please refer to the architectural drawings, design statement and the landscape drawings and particulars which accompany this planning application.

4 EIA SCREENING METHODOLOGY

4.1 Legislation & Guidance

- 4.1.1 Environmental Impact Assessment (EIA) requirements derive from EU Directives, the most recent of which is EU Directive 2014/52/EU. The requirements of the EU Directives have been transposed into Irish Legislation, within the Planning & Development Act 2000 (as amended) and the Planning & Development Regulations 2001 (as amended). The latest amendment to the Planning & Development Regulations incorporated the provision of the European Union Planning & Development (Environmental Impact Assessment) Regulations 2018 (SI 296/2018).
- 4.1.2 This screening report is drafted based on the requirements of the planning legislation. Also, this screening exercise has been undertaken with reference to the following documents:
- Planning and Development Act 2000 (as amended);
 - Planning and Development Regulations 2001-2018 (as amended);
 - Environmental Impact Assessment – Guidelines for Planning Authorities (2013);
 - Environmental Impact Assessment – Guidance for Consent Authorities regarding sub-threshold development (2003)

4.1.3 On the basis of the above legislation and guidelines, it has been possible to carry out a screening exercise using the available guidance whilst also having regard to the applicable legislation & thresholds. In order to ensure all relevant environmental matters are considered for the purposes of this report this screening exercise is carried out in accordance with the new Directive 2014/52/EU and relevant matters for consideration set out therein.

4.2 EIA Thresholds

4.2.1 For planning applications/projects schedule 5 of the Planning and Development Regulations 2001 (as amended) sets out the thresholds for which projects, must be subject to an Environmental Impact Assessment. (or what is now known as an EIAR)

4.2.2 Specifically, part 2 of Schedule 5 sets out the following that may be relevant to the proposal:

“10. Infrastructure projects –

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

(b)(iii) Construction of a shopping centre with a gross floor space exceeding 10,000 square metres;

(b)(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).

14. Works of Demolition

Works of demolition carried out in order to facilitate a project listed in Part 1 or Part 2 of this Schedule where such works would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.

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

4.2.3 In response to what are considered to be the relevant thresholds to this project we submit:

- the proposal relates to the construction of 120 no. apartments along with a crèche restaurant/café and 3no. office units.
- given the site area is 1.05 hectares it is submitted the proposed development is significantly below the threshold(s) for a mandatory EIAR requirement of 2 hectares in such areas; (ie an urban context).
- there are no demolition works proposed.

4.2.4 We also note that class no. 15 of the 2001 Regulations relates to projects likely to have significant effects on the environment having regard to Schedule 7. The following section hereunder is to ‘screen’ for the requirement of EIAR on a sub-threshold project as the proposal does not exceed any other threshold in Schedule 5.

4.3 Sub-threshold projects requiring EIA

4.3.1 We note that in some circumstances development which is below the threshold of requiring an EIAR as set out in Schedule 5 of the Planning and Development Regulations 2001 (as amended) may however still require an EIA. (referred to as sub-threshold projects). On this basis we consider it appropriate to screen the proposed development against the criteria for determining whether there are likely to be any significant effects on the environment emanating from the project.

4.3.2 Accordingly for the purposes of this report we consider it appropriate to assess the likelihood of significant effects on the environment against the criteria and particulars set out in Annex III of the EIA Directive as defined under 2014/52/EU at a European level.

4.3.3 For ease of reference, the criteria are listed under three broad headings:

- Characteristics of projects;
- Location of projects; and
- Types and characteristics of the potential impact.

4.3.4 This report here-under will address these headings.

5 EIA SCREENING EXERCISE

5.1 Introduction

- 5.1.1 The following sub-sections assess the development against the criteria for determining whether there are likely to be any significant effects on the environment emanating from the project.

5.2 Characteristics of Proposed Development

- 5.2.1 *Could the size and design of the whole proposed development be likely to cause significant effects on the environment?*

Response: The proposed development is for 120no. apartments along with an ancillary crèche, restaurant and 3no. office units on a site of 1.05 hectares. This is not considered to be a large scale project in an urban context.

- 5.2.2 *Could the development in culmination with other proposed and/or approved developments be likely to cause significant effects on the environment?*

Response: The subject lands are brownfield in an urban context. Notwithstanding the adjacent Cairn Homes development (SHD reference 301230), we note an EIAR accompanied the adjacent SHD application and the likely environmental effects of the adjoining authorised development have already been assessed by An Bord Pleanála. On review we consider the environmental safeguards and project plans set out therein will ensure no adverse impacts on the environment from that proposal, or in combination with our submitted application given the size, nature and design of the proposal is in keeping with the planned development for Maynooth as set out under the relative zoning.

- 5.2.3 *Could the nature of any associated demolition works be likely to cause significant effects on the environment?*

Response: No; there are no demolition works proposed.

- 5.2.4 *Could the use of natural resources in relation to the proposed development, in particular, land, soil, water and biodiversity be likely to cause significant effects on the environment?*

Response: No. The main use of resources will be the construction materials used. The scale and relatively small site area means development works will not be of a scale such that would cause concern in relation to significant effects on the environment.

- 5.2.5 *Could the production of waste in relation to the proposed development be likely to cause significant effects on the environment?*

Response: No. In respect of any waste generated during construction, it will be disposed of using licensed waste disposal facilities and contractors. During the operational phase (ie. when occupied), everyday refuse and waste will be disposed of by an approved licensed refuse company.

- 5.2.6 *Could pollution and nuisances generated by the proposed development be likely to cause significant effects on the environment?*

Response: As with any project there will be potential for dust and noise produced during the construction phases. However, this will be managed by ensuring construction work operates within the provisions of a project management plan. In this regard we consider that pollution and nuisances are not considered to likely have the potential to cause significant effects on the environment.

5.2.7 *Could 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 be likely to cause significant effects on the environment?*

Response: No; best-practice construction methods will be employed throughout the construction phase.

5.2.8 In respect of flood risk, we submit the subject lands are zoned under the Local Area Plan and have been subject to a both Strategic Flood Risk Assessment and Strategic Environmental Assessment. Further, a site specific FRA as prepared by RPS included with the planning application and the associated informed scheme design has not highlighted any cause for concern in terms of flood risk to the proposal.

5.2.9 *Could the risk to human health (for example due to water contamination or air pollution) be likely to cause significant effects on the environment?*

Response: No. Aside from the construction phase which will be carried out in accordance with a project management plan, at operational stage the proposal is to be connected to public foul and storm water systems and no significant effects on the environment thereafter.

5.3 Location of Proposed Development

5.3.1 *Having regard to the existing and approved land use; could the environmental sensitivity of geographical areas be likely to be affected by the proposed development?*
Response: No. The proposed development is located in an urban environment on land zoned for residential development. The proposal is therefore ‘plan led’.

5.3.2 In respect of impacts on the Natura 2000 network, the Natura Impact Statement and Ecological Impact Assessment Report accompanying the application concludes that the integrity of such sites can be protected using best-practice construction methods. Thereafter when operational there will be no emissions which will affect environmentally sensitive sites.

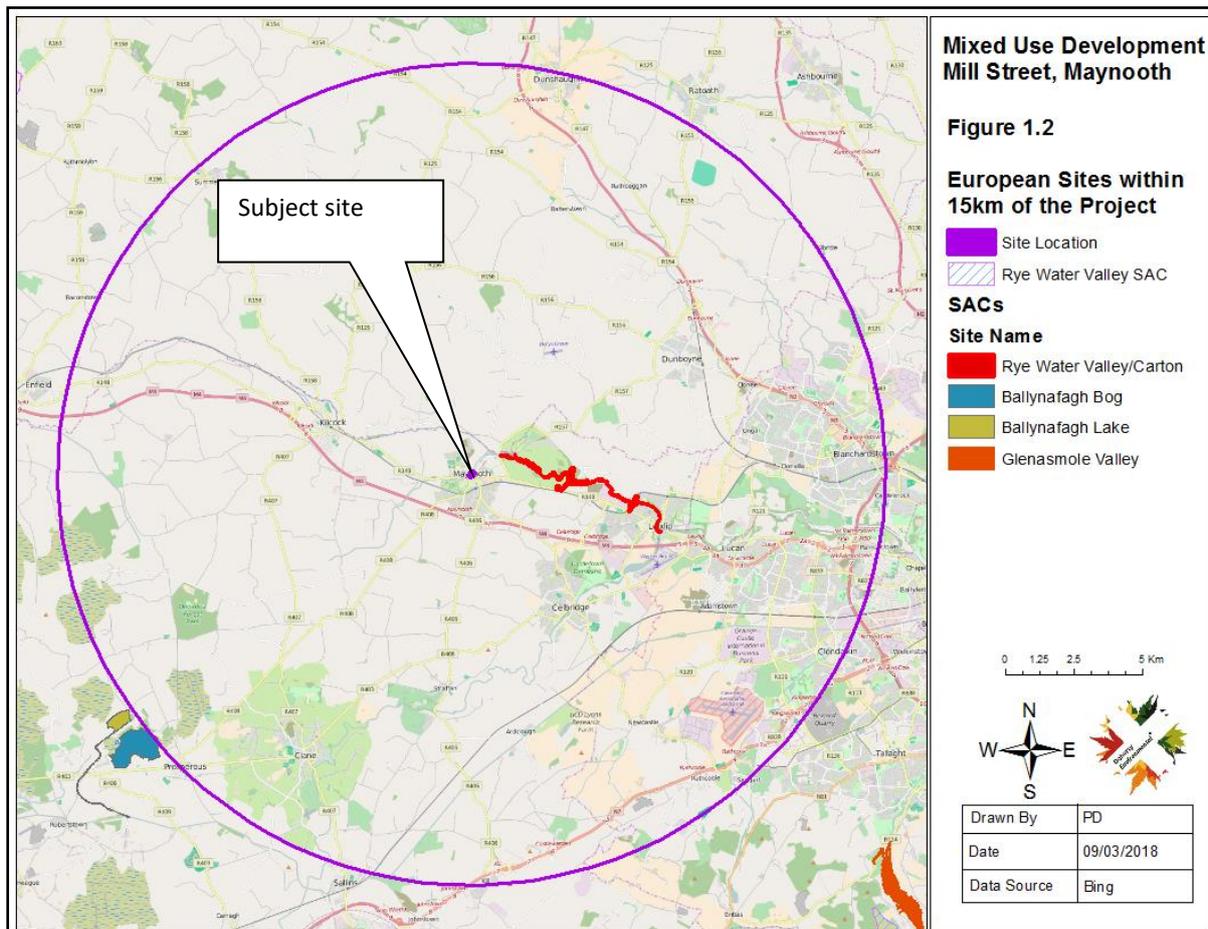


Figure 1 Site location and European sites within 15km radius

5.3.3 *Having regard to the absorption capacity of the natural environment; could the environmental sensitivity of geographical areas be likely affected by the proposed development?* The absorption capacity is to be assessed under the headings as follows:

5.3.4 *Wetlands, Riparian Areas and River Mouths*
Response: The proposed development is not within or directly connected to wetlands, riparian areas or river mouths. There are no known pathway connectors between the site and these areas.

5.3.5 *Coastal Zones and the Marine Environment*

Response: The proposed development is not within or directly connected to coastal zones or the marine environment.

5.3.6 *Mountain and forest areas*

Response: The proposed development is not within or directly connected to any mountain or forest areas.

5.3.7 *Nature reserves and parks*

Response: The proposed development is not within or directly connected to any nature reserves or parks.

5.3.8 *Areas classified or protected under national legislation, including Natura 2000 areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.*

Response: The proposed development is not within any protected environments. In respect of the pathway connector between the subject site and the Natura 2000 sites, this is addressed comprehensively in the Natura impact Statement which accompanies the application and concludes the integrity of 'connected' European sites will not be adversely affected by the proposal.

5.3.9 *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.*

Response: Not applicable.

5.3.10 *Densely populated areas*

Response: The regeneration of this infill site will provide a residential scheme on a valuable land resource. The site is zoned and the use is compatible with the existing development and uses in the vicinity. Therefore, there are no anticipated likely significant effects on the environment in relation to any densely populated areas.

5.3.11 *Landscapes and sites of historical, cultural or archaeological significance.*

Response: Notwithstanding the protected structure adjacent and ACA of Maynooth it is not considered the proposal will adversely affect the integrity of these existing features.

5.4 **Other Considerations of Significant Likely Effects**

5.4.1 *Population & Human Health*

Response: During construction stage(s) there may be possible short term nuisances to human beings from noise and disturbance. These are not likely to be at such a quantity or of such a degree that would warrant the completion of a sub threshold EIAR. Noise and dust or pollution will be subject to standard mitigation measures as per typical urban projects. Post construction works it is not considered there are any operational impacts that would be likely to cause significant effects on the recipient population and human health.

5.4.2 *Biodiversity*

Response: The subject site is not included in any Natura 2000 site and does not support any of the habitats or species of interest. (refer to ECIA by Doherty Environmental). In addition, the Natura Impact statement prepared by Doherty Environmental satisfactorily demonstrates the proposed development will not adversely affect the integrity of any Natura 2000 sites. Further, the habitat survey as

carried out by Doherty Environmental concludes the development will not result in the direct loss of any high-value habitat receptors.

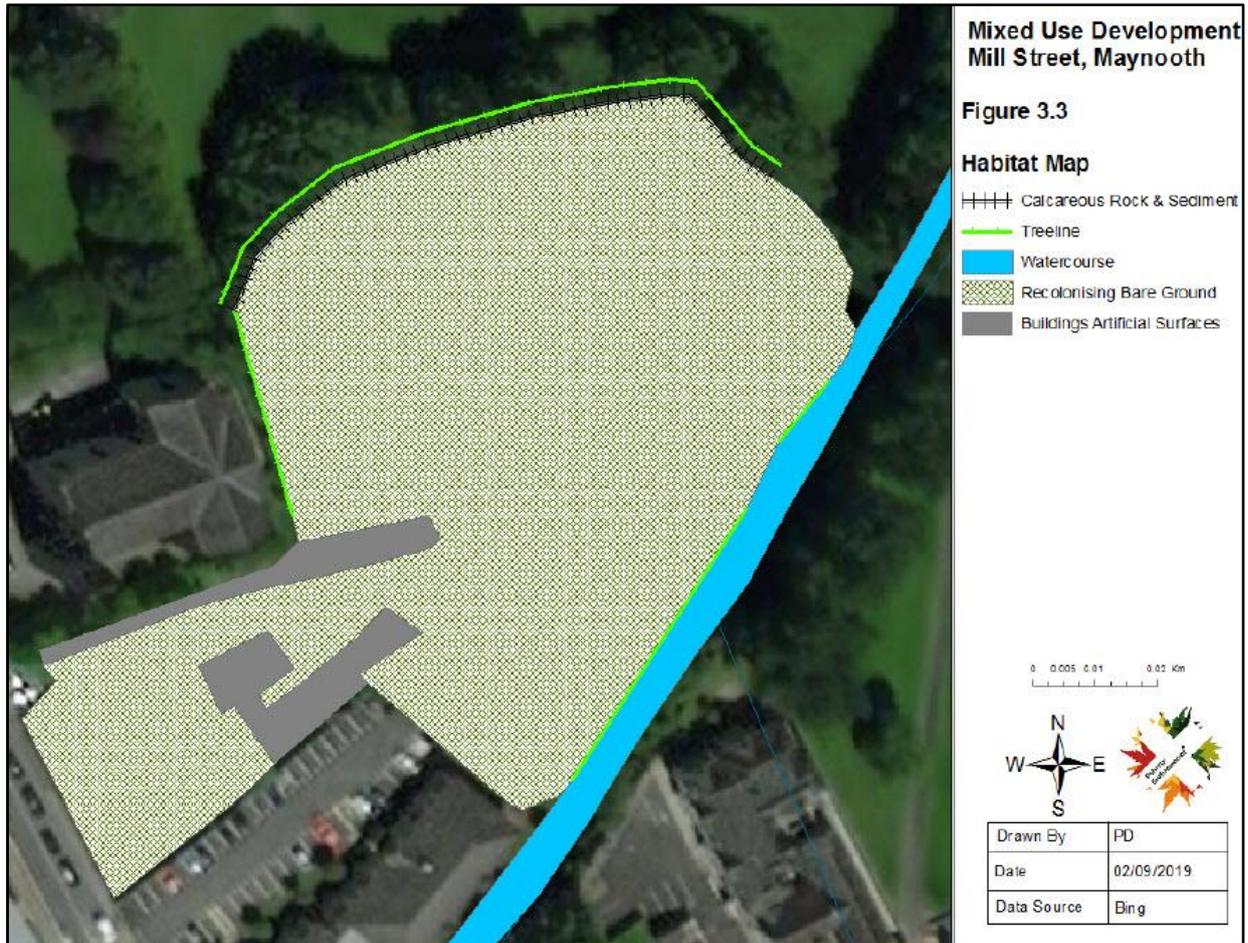


Figure 2 Habitat survey map as recorded by Doherty Environmental

5.4.3 Lands and Soils

Response: There is not likely to be significant effects on the environment in the long term with regard to land and soils due to the site being connected to public foul and storm networks.

5.4.4 Water

Response: Notwithstanding the Lyreen River adjacent, subject to best practice during construction phase it is considered that in relation to water, there are no anticipated significant effects on the environment arising from the proposed development.

5.4.5 Air & Climate

Response: Subject to best practice during construction phase it is considered that there are no anticipated significant effects on the air or climate arising from the proposed development.

5.4.6 Noise & Vibration

Response: Subject to best practice during construction phase it is considered that there are no anticipated significant effects in this regard arising from the proposed development.

5.4.7 *Landscape*

Response: It is not considered that there will be likely significant effects on the environment in relation to landscape. We refer to the visual impact assessment which accompanies the application.

5.4.8 *Material Assets*

Response: The proposal is 'plan led' and consistent with the zoning; no impacts are envisaged which have not been considered through the statutory forward plan stage(s).

5.4.9 *Interaction of Foregoing*

Response: We submit that any of the aforementioned relatively minor impacts would not in themselves be considered significant nor would they cumulatively result in a likely significant effect on the environment.

5.4.10 Further, in light of the above we also note directive 2014/52/EU requires assessment of impact on climate change under each of the EIA/EIAR chapter headings. In response it is considered that there are no likely significant effects on the environment in terms of each of the chapter headings, individually or cumulatively.

5.5 **Type and Characteristics of Potential Impacts**

5.5.1 *Could the type and characteristics of the magnitude and/or extent of the impact (for example on a geographical area and/or size of the population likely to be affected) be considered to be likely to cause significant effects on the environment?*

Response: The proposed development is located in an urban area. The works during construction or the operational phase are not of such a scale or extent that would be considered to be likely to cause significant effects on the environment in the locality.

5.5.2 *Could the type and characteristics of the transboundary nature of the impact be considered to be likely to cause significant effects on the environment?*

Response: Any minor impacts will be contained in the immediate vicinity of the site. Given the location of Maynooth no transboundary impacts are likely.

5.5.3 *Could the type and characteristics of the intensity and complexity of the impact be considered to be likely to cause significant effects on the environment?*

Response: The proposed development is not of any significant intensity or complexity such that would be likely to cause significant effects on the environment.

5.5.4 *Could the type and characteristics of the probability of the impact be considered to be likely to cause significant effects on the environment?*

Response: As with any urban project relatively minor emissions of noise and pollution will be generated during the construction phase; however this is normal and working hours will be limited generally to hours set by condition or as otherwise agreed to ensure best practice is adhered to.

5.5.5 *Could the type and characteristics of the expected onset, duration, frequency and reversibility of the impact be likely to cause significant effects on the environment?*

Response: Any of the impacts identified would occur during the construction phase but will be temporary. Post construction and operation stage no significant effects are likely in the long term.

5.5.6 *Could the type and characteristics of the cumulation of the impact with the impact of other existing and/or approved projects be likely to cause significant effects on the environment?*

Response: We submit the development and regeneration of land is to be expected in an urban context. Any additional projects to be assessed separately under the planning process to ensure each project is correctly assessed and no adverse impacts on the recipient environment.

5.5.7 *Could the type and characteristics of the possibility of effectively reducing the impact be likely to cause significant effects on the environment?*

Response: No. We refer to associated Project Construction Management Plan for full details which sets out how measures to reduce impacts on the environment are standard practice.

6 SUMMARY & CONCLUSIONS

- 6.1 This environmental report has been prepared to accompany the strategic housing development planning application to An Bord Pleanála for the development of 120 no. residential units as well as a restaurant/café, creche, 3no. office units and associated site works.
- 6.2 The report has assessed the potential impact of the proposed development on the environment. The screening exercise has been completed in this report and the methodology used has been informed by the available guidance, legislation and directives.
- 6.3 This report has assessed the potential impact of the proposed development on the environment. In summary we submit the proposed development is below the thresholds for a mandatory EIA.
- 6.4 Further, it is submitted on the basis of our professional consideration that a sub-threshold EIA is not required for the proposed mixed-use development for the following reasons as set out in this report:
- The proposal falls significantly below the relevant thresholds of Schedule 5 of the Planning and Development Regulations 2001 (as amended).
 - The proposal is in keeping with the planned development for Maynooth as set out under the relative zoning.
 - The development will be connected to public services such as water, foul and storm sewers.
 - Standard construction practices can be employed to mitigate any risk of noise, dust or pollution.
 - No identified impact in this screening exercise, cumulatively or individually is considered to likely cause significant effects on the environment.
- 6.5 In respect of impacts on the Natura 2000 network, a Natura Impact Statement accompanies the planning application and which concludes that the proposed development would not have an adverse impact on the integrity of any Natura 2000 sites. Also, the Ecological Impact Assessment Report prepared by Doherty Environmental also outlines that the proposed development will not have any adverse impacts on features of ecological value.
- 6.6 In conclusion, it is considered that the proposed development will not have any significant impacts on the environment. Standard best practice(s) will be employed throughout the construction and operation phase of the development to ensure that the proposed development will not create any significant impacts on the recipient environment.



Ronan Woods
Director