

May
2024

Environmental Impact Assessment (EIA) Screening Report



**52 New Road,
Thomondgate,
Limerick**



ASH Ecology & Environmental

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1.0 Introduction

1.1 Purpose of the Report

This Screening for Environmental Impact Assessment (EIA) Report was undertaken by Ash Ecology & Environmental Ltd (AEE) on behalf of Limerick City & County Council (LCCC) for the construction of a housing development comprising 6 No. housing units and all associated site works at 52 New Road, Thomondgate, Limerick, see Figure 1. The existing and proposed site layouts are shown as Figure 2. The existing site also contains a vacant pub and extension. Old sheds onsite have been subject to demolition between September 2023 and January 2024.

Other reports consulted to compile this EIA Report were:

- Screening for Appropriate Assessment Report (AA) (AEE, May, 2024)
- Bat Survey Report (AEE, May 2023)
- Bird Survey Report (AEE, January 2024)
- Flood Risk Assessment (Punch Engineering, June 2023)
- An Invasive Alien Plant Species Phase 1 Site Inspection & Management Plan (Veon Ecology, May 2023)

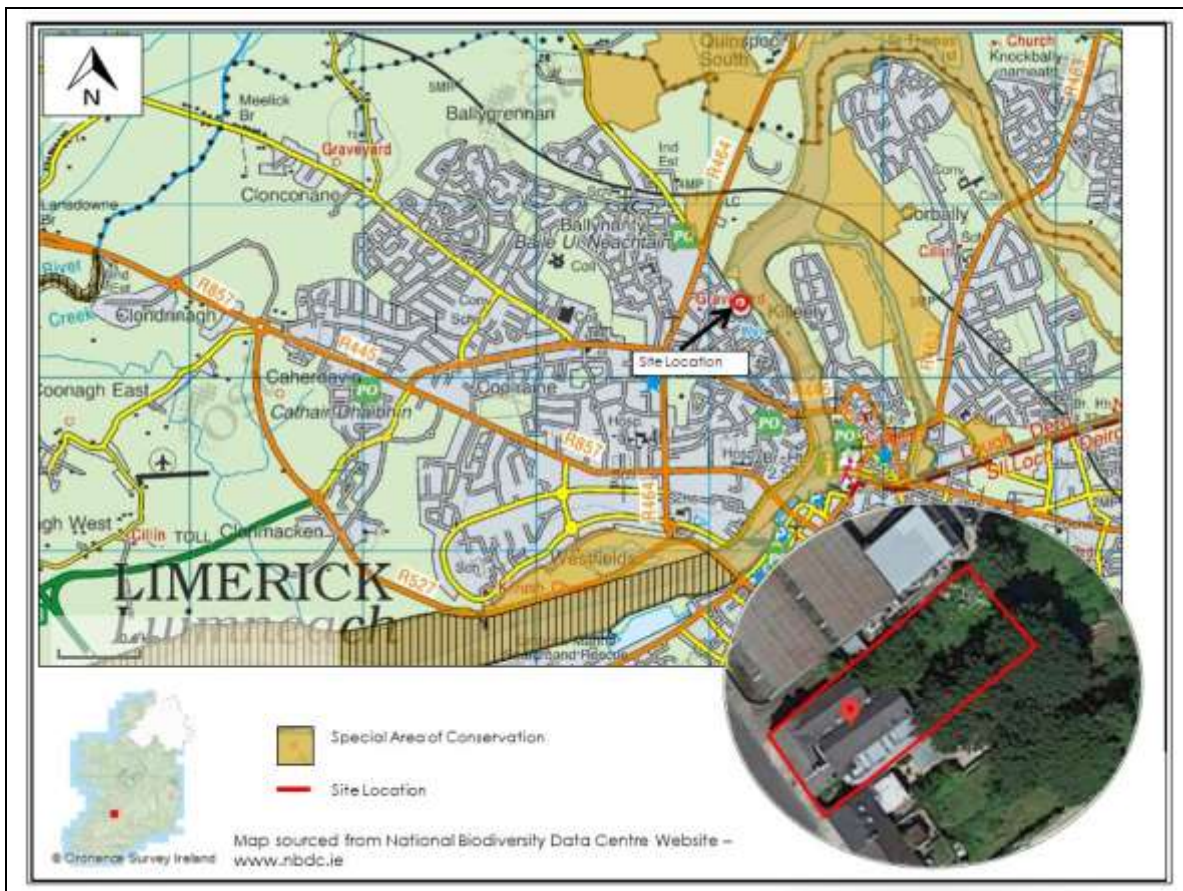


Figure 1 Site Location

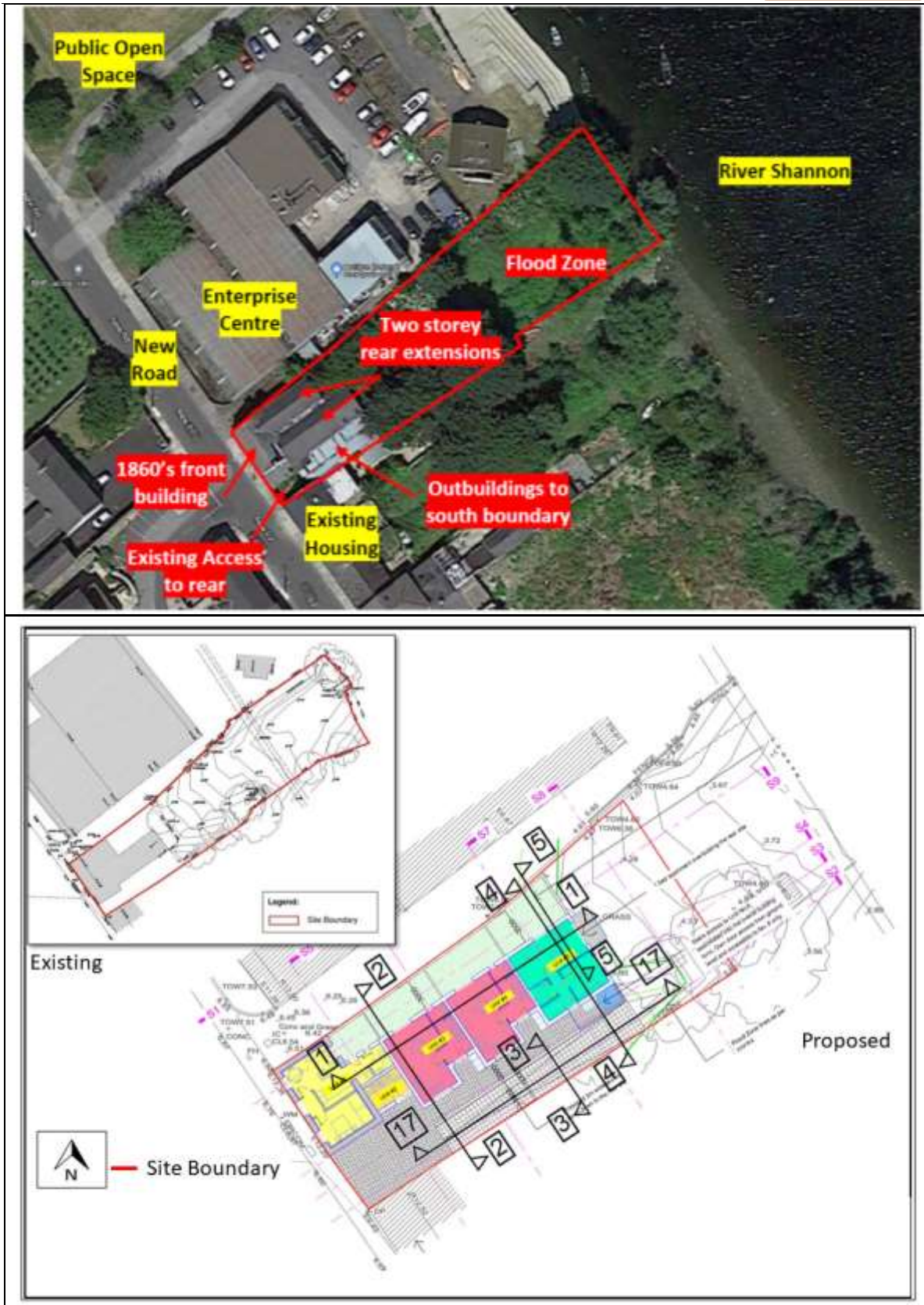


Figure 2 Existing and Proposed Site Layouts



Figure 3 Existing Drainage

The purpose of the report is to determine if Environmental Impact Assessment (EIA) is required for the proposed development as set out in the mandatory and discretionary provisions of the Planning and Development Regulations 2001-2019 (Unofficial Consolidation) (annotated) 30th May 2019. 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 has examined the project with reference to the relevant thresholds and criteria.

The 'Screening stage' ascertains whether the project's effects on the environment are expected to be significant, i.e. the project is 'Screened' to determine whether an EIA is necessary. Projects listed in Annex I of the Directive are automatically subjected to an EIA because their environmental effects are presumed to be significant. Projects listed in Annex II of the Directive require a determination to be made about their likely significant environmental effects. The Member State's Competent Authority make that determination through either a (i) case-by-case examination or (ii) set thresholds or criteria.

The purpose of Screening is to determine whether or not an EIA is required for a particular project listed in Annex II of the EIA Directive. Projects listed in Annex II will hereafter be referred to as 'Annex II Projects'. Screening has to implement the Directive's overall aim, i.e. to determine if a project listed in Annex II is likely to have significant effects on the environment and, therefore, be made subject to a

requirement for Development Consent and an assessment, with regards to its effects on the environment. At the same time, Screening should ensure that an EIA is carried out only for those Projects for which it is thought that a significant impact on the environment is possible, thereby ensuring a more efficient use of both public and private resources. Hence, Screening has to strike the right balance between the above two objectives.

This report meets the requirements of Directive 2014/52/EU and has been prepared with regard to the relevant guidelines from the European Commission, Department of Housing, Planning and Local Government and EPA. This report has been prepared to allow the Competent Authority (CA) to prepare an EIAR Screening Conclusion Statement.

1.2 Competency of Assessor

This report has been prepared by Aisling Walsh MCIEEM, AMILP, MSc. who is a Full Member of the CIEEM (the Chartered Institute of Ecological and Environmental Management). Aisling is the Managing Director of Ash Ecology & Environmental Ltd (AEE) and has over 17 years of experience providing environmental consultancy and environmental assessment services. Ash Ecology a Registered Practice of the CIEEM. Aisling has extensive experience in compiling Screening for Appropriate Assessment Stage I and Stage II Natura Impact Statements, Environmental Impact Assessments/Statements and Screening for Environmental Impact Assessment.

Her qualifications include a MSc in Biodiversity and Conservation (TCD), B.Sc. (Hons) Zoology (NUIG), B.Sc. Applied Aquatic Science (GMIT). She also has a Certificate of Competence in Environmental Noise Measurement from the Institute of Acoustics and is an experienced Hydrologist and has conducted numerous Flood Risk Assessments for planning applications. Aisling is a member of Bat Conservation Ireland and an associate member of the Institute of Lighting Professionals (ILP) and a qualified noise technician (Certificate of Competence in Environmental Noise Measurement, Institute of Acoustics).

2.0 The Screening Process

2.1 Legislation

This EIA screening report has been prepared to meet the requirements of EU Directive 2014/52/EU and the Planning and Development Regulations 2001-2019 (Unofficial Consolidation) (annotated) 30th May 2019. The requirements for Screening are contained in Article 4 of the EIA Directive, Annex IIA, and Annex III to the Directive. The relevant provisions of Article 4 are cited below.

Directive 2011/92/EU as amended by Directive 2014/52/EU

Article 4(2)

[...] for projects listed in Annex II, Member States shall determine whether the project shall be made subject to an assessment in accordance with Articles 5 to 10. Member States shall make that determination through:

- (a) a case-by-case examination; or*
- (b) thresholds or criteria set by the Member State.*

Member States may decide to apply both procedures referred to in points (a) and (b).

Article 4(3)

Where a case-by-case examination is carried out or thresholds or criteria are set for the purpose of paragraph 2, the relevant criteria set out in Annex III shall be taken into account. Member States may set thresholds or criteria to determine when projects need not undergo either the determination under paragraphs 4 and 5 or an environmental impact assessment, and/or thresholds or criteria to determine when projects shall in any case be made subject to an environmental impact assessment without undergoing a determination set out under paragraphs 4 and 5.

Article 4(4)

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 its 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 relevant 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(5)

The competent authority shall make its determination, on the basis of the information provided by the developer in accordance with paragraph 4 taking into account, where relevant, the results of preliminary verifications or assessments of the effects on the environment carried out pursuant to Union legislation other than this Directive. The determination shall be made available to the public and: (a) where it is decided that an environmental impact assessment is required, state the main reasons for requiring such assessment with reference to the relevant criteria listed in Annex III; or (b) where it is decided that an environmental impact assessment is not required, state the main reasons for not requiring such assessment with reference to the relevant criteria listed in Annex III, and, where proposed by the developer, state 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(6)

Member States shall ensure that the competent authority makes its determination as soon as possible and within a period of time not exceeding 90 days from the date on which the developer has submitted all the information required pursuant to paragraph 4. In exceptional cases, for instance relating to the nature, complexity, location or size of the project, the competent authority may extend that deadline to make its determination; in that event, the competent authority shall inform the developer in writing of the reasons justifying the extension and of the date when its determination is expected.

While Article 4(2) defines a common Screening approach, to be adopted by Member States, Article 4(3) requires that the competent authorities consider relevant criteria when deciding whether EIA is needed, i.e. the type/characteristics and size of Projects, the sensitivity of Project locations, as well as the potential impacts the Project may trigger. These criteria are listed in Annex III to the Directive. Where Member States require that a case-by case examination be conducted for Annex II Projects in their national legislation, then the Developer must submit the information required about the Project in accordance with the detailed requirements in Annex IIA to the Directive (see Article 4(4)). The Developer shall, when submitting the information, take the available results or data from other relevant assessments of effects on the environment, carried out pursuant to other EU legislation than the EIA Directive (e.g. SEA, see the Annex to this Guidance Document on Links with Other EU Instruments), into account. Furthermore, the Developer may enclose information about the Project's features and the measures envisaged to avoid or prevent potential significant adverse effects on the environment. The Competent Authority in Member States must issue its decision, on whether a proposed Annex II Project is to be subjected to the EIA procedure or not, based on the information provided by the Developer in accordance with the detailed requirements in Annex IIA (see Article 4(5)). The authority is also required to take any other relevant assessments, carried out on the effects on the environment pursuant to other EU legislation than the EIA Directive, into account. Finally, the Competent Authority must make its decision on whether EIA is required or not within the time period specified in Article 4(6).

The 2014 revisions to the EIA Directive introduced several amendments (e.g. to Annex III, which lays down the criteria to determine whether the Projects listed in

Annex II should be subject to an EIA) and added a number of new provisions to the Screening process, including a timeframe within which the Member State's Competent Authority must reach a decision on whether an EIA is required or not. A new Annex IIA is to be used in the case of screening determination (i.e. information to be provided by the developer on projects listed in Annex II), which consists of:

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.

A description of the aspects of the environment likely to be significantly affected by the project.

A description of any likely significant effects, to the extent of the information available on such effects, or the project on the environment resulting from:

- a) The expected residues and emissions and the production of waste, where relevant;
- b) The use of natural resources, in particular soil, land, water and biodiversity.

The criteria of Annex III shall be taken into account, where relevant, when compiling the information in accordance with points 1 to 3.

The Directive also amends Annex III "Selection Criteria referred to in Article 4(3)". The details to be considered in the new Annex III are as follows:

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).

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
 - f) designated by Member States pursuant to Directives 92/43/EEC and 2009/147/EC,
 - g) areas in which there has already been a failure to meet the environmental quality
 - h) standards, laid down in Union legislation and relevant to the project, or in which it is
 - i) considered that there is such a failure,
 - j) densely populated areas,
 - k) landscapes and sites of historical, cultural or archaeological significance.

Type and 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.

In compliance with the requirements of 2014/52/EU, this EIA Screening Report provides details of the information specified in Annex IIA, taking account of the criteria in Annex III.

In summary Projects can be placed into one of the following categories:

- those that exceed the thresholds laid down and therefore have a mandatory requirement to prepare an EIS; and
- those projects that are sub-threshold and must be assessed on a case-by-case basis to determine whether or not they are likely to have significant effects on the environment;
- projects that fall under Annex II (13) (a) of the Directive for Any change or extension of projects listed in Annex I or Annex II, already authorised, executed in the process of being executed.

2.2 Guidance

Screening is the process of deciding whether a development requires an EIAR. The particulars of the assessment procedure are adopted through European Directives and correlate to the provisions set out in the Planning and Development Act 2001 (as amended). An EIA is required to be carried out as part of an application whereby the proposed development exceeds the limitations of Schedule 5 of the Planning and Development Regulations 2001 (as amended). The methodology for screening generally considers the following documents:

- Planning and Development Act 2000 (as amended);
- Planning and Development Regulations 2018 (as amended);
- Directive 2011/92/EU;
- Directive 2015/52/EU;
- Transposition of 2014 EIA Directive (2014/52/EU) in the Land Use Planning and EPA Licensing Systems – Key Issues Consultation Paper (2017; DoHPCLG);
- Preparation of guidance documents for the implementation of EIA directive (Directive 2011/92/EU as amended by 2014/52/EU) – Annex I to the Final Report (COWI, Millieu; April 2017);
- European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018;
- Guidance for Consent Authorities regarding Sub-threshold Development (2003; DoEHLG)
- OPR Practice Note PN02, Environmental Impact Assessment Screening (2021)
- Guidelines on the Information to be Contained in Environmental Impact Assessment Reports' (Environmental Protection Agency, May 2022)
- Environmental Impact Assessment – Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018; DoHPLG);

Using the above documents, it has been possible carry out a desktop EIA Screening using the best available guidance while operating within the applicable legislation. It is noted that Directive 2014/52/EU has been transposed into Irish Legislation through the Planning and Development (Amended) Act and Planning and Development Regulations 2018.

The methodology employed in this screening exercise had regard to the Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment published in August 2018 by the DoHPLG, together with the

criteria set out in Schedule 7 and the requirements of Schedule 7A, both of the Planning and Development Regulations 2018.

The 'Guidelines on the Information to be Contained in Environmental Impact Assessment Reports' (Environmental Protection Agency, May 2022) provide a flow diagram of the screening process which is provided in the Figure 4 below.

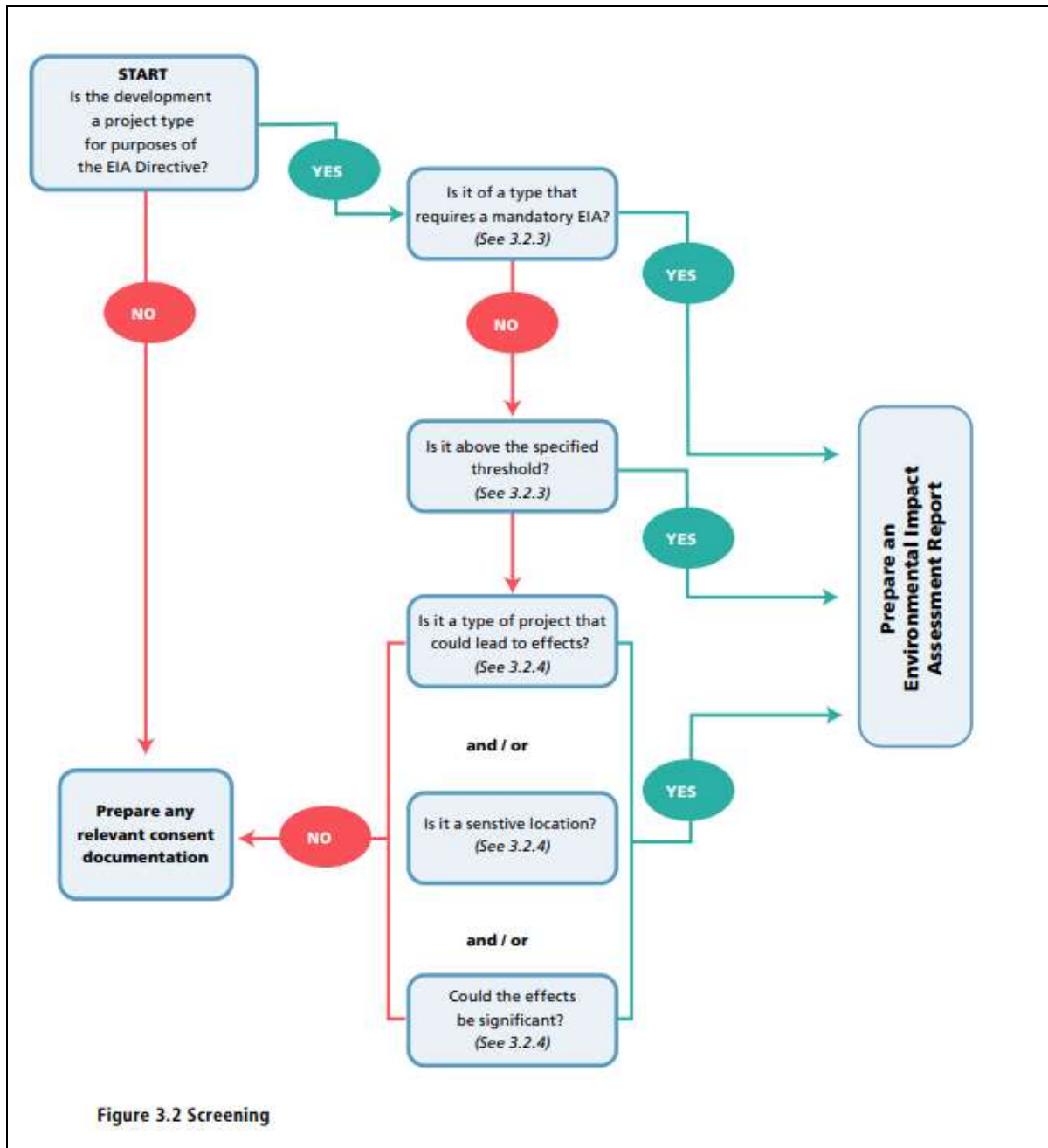


Figure 4 Flow Diagram of the Screening Process (Source: Guidelines on the Information to be Contained in Environmental Impact Assessment Reports' (Environmental Protection Agency, May 2022)

2.3 Consultation

No consultation was undertaken as part of the current EIAR Screening report. This report has been prepared to allow the Competent Authority (CA) to prepare an EIA Screening Conclusion Statement.

3.0 Project Information Required by Annex II (A) of 2014/52/EU

3.1 Description of Project

3.1.1 Physical Characteristics of the Project

The site is approx. 0.125ha. There are a number of existing structures on the upper/south-west end of the site. Whelan's Pub (now vacant) occupies the entire road frontage, and has previously been extended to the rear with long and narrow two storey extensions. The original building to the front dates to c.1860 however it is not a protected structure. A number of single storey outbuildings and shelters occupy the south western boundary. The disused pub occupies the ground floor (approx. 210sqm), with a large three bedroom apartment occupying the first floor (approx. 180sqm).

The proposed development consists of the construction of 6 housing units and associated site works at 52 New Road, Thomondgate, Limerick. The project involves the following:

- Refurbishment of the existing 'Whelan's Pub' building on the street into 2 new build apartments.
- Demolition of rear extensions to be replaced with 4 new build apartments/houses.
- Demolition of side outbuildings and shelters along the southwest boundary (which has since taken place), and construction of a new pedestrian and maintenance access lane.
- Retention of the rear/lower part of the site as a floodplain.

Foul water from the proposed development will connect to the existing foul water network. Irish Water has confirmed there is capacity to accept the proposed connection (see Planning documents).

Surface water run-off from all hard surfaces will connect to the existing public surface water drainage network. The Limerick Wastewater Treatment Plant (WWTP D0013) was confirmed to be at 'Green' capacity as of April 30th 2024.

A Planning Stage Construction Environmental Management Plan (CEMP) will be compiled to address main environmental management measures such as noise, dust, water pollution prevention, invasive species control, etc.

Habitats onsite, as per the aerial photography and site surveys, include:

- Buildings and Artificial Surfaces (BL3) - existing vacant pub building, extension, and ancillary sheds (demolished between May 2023 and January 2024)
- Scrub and Grassy Verge (WS1/GS2) - mosaic of scrub vegetation and grassy meadow to the rear of pub, previously improved grassland
- Treelines (WL2) - along the southeast site boundary, some trimming for health and safety reasons

3.1.2 Location of the Project, with regard to Environmental Sensitivities of Geographic Areas likely to be affected

There is no high value habitat present within the site of the proposed development site or any particularly vulnerable features of interest. The River Shannon is approx. 30m from the site boundary, and the Lower River Shannon SAC boundary 10m from the site boundary. There are no direct hydrological connections onsite such as open drains.

Figures 5 and 6 below shows the location of the proposed development in the context of the local Natura 2000 network within 15km of the development. There are a total of four SAC sites and one SPA site. The nearest Natura 2000 site to the proposed development is Lower River Shannon SAC ~10m northeast. Figure 7 below shows the location of the 2 pNHAs (Proposed Natural Heritage Areas) within a 5km radius of the proposed development site. The closest is Knockalisheen Marsh pNHA (Site Code 002001) c. 420m northwest of the site. There are no sites with full NHA status within 5km of the site.

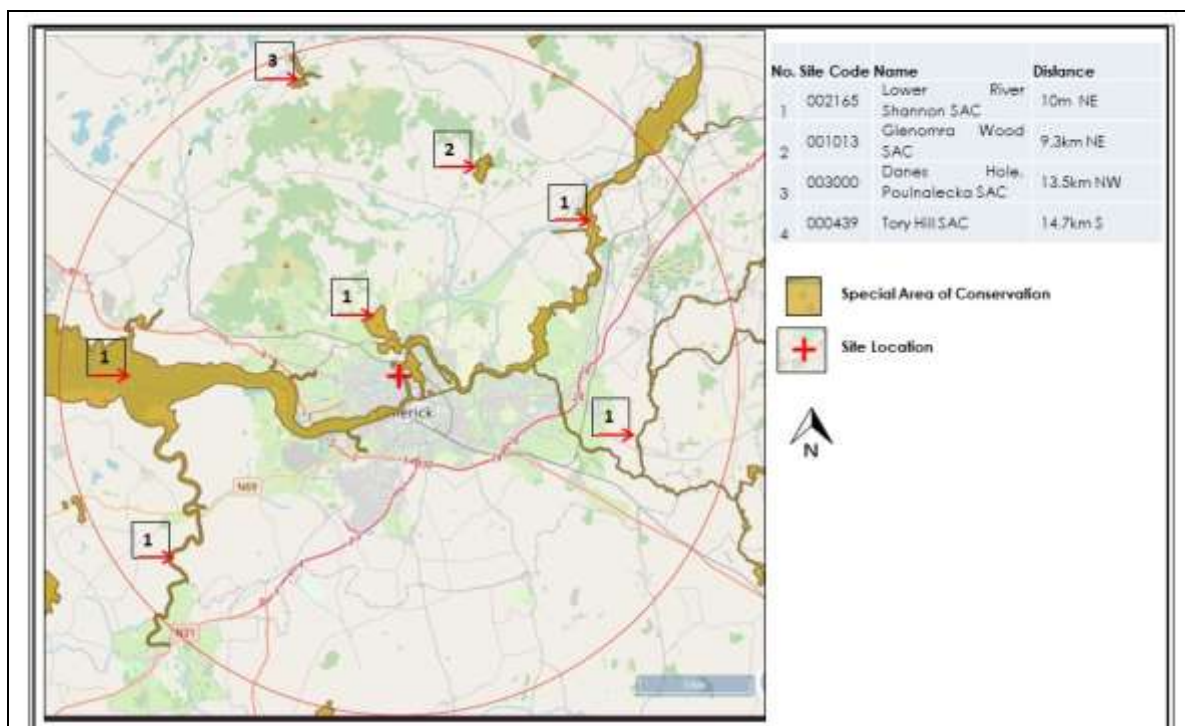


Figure 5 Special Areas of Conservation (SACs) within 15km of Site

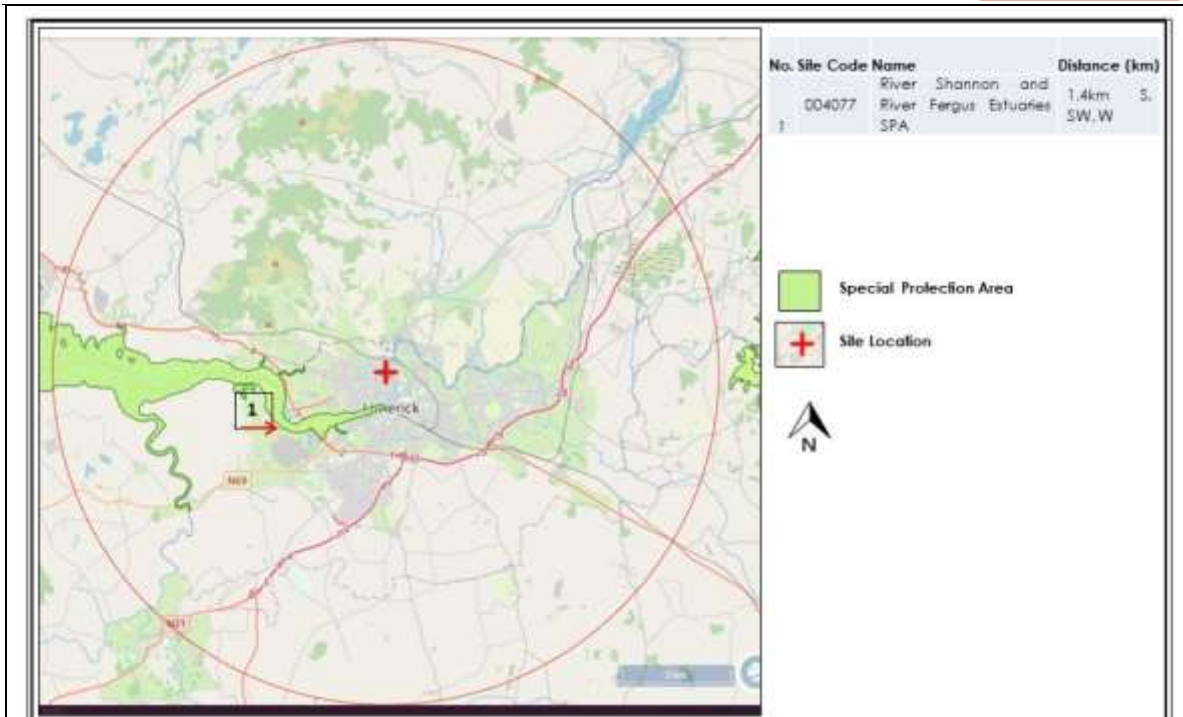


Figure 6 Special Protection Area (SPAs) within 15km of Site

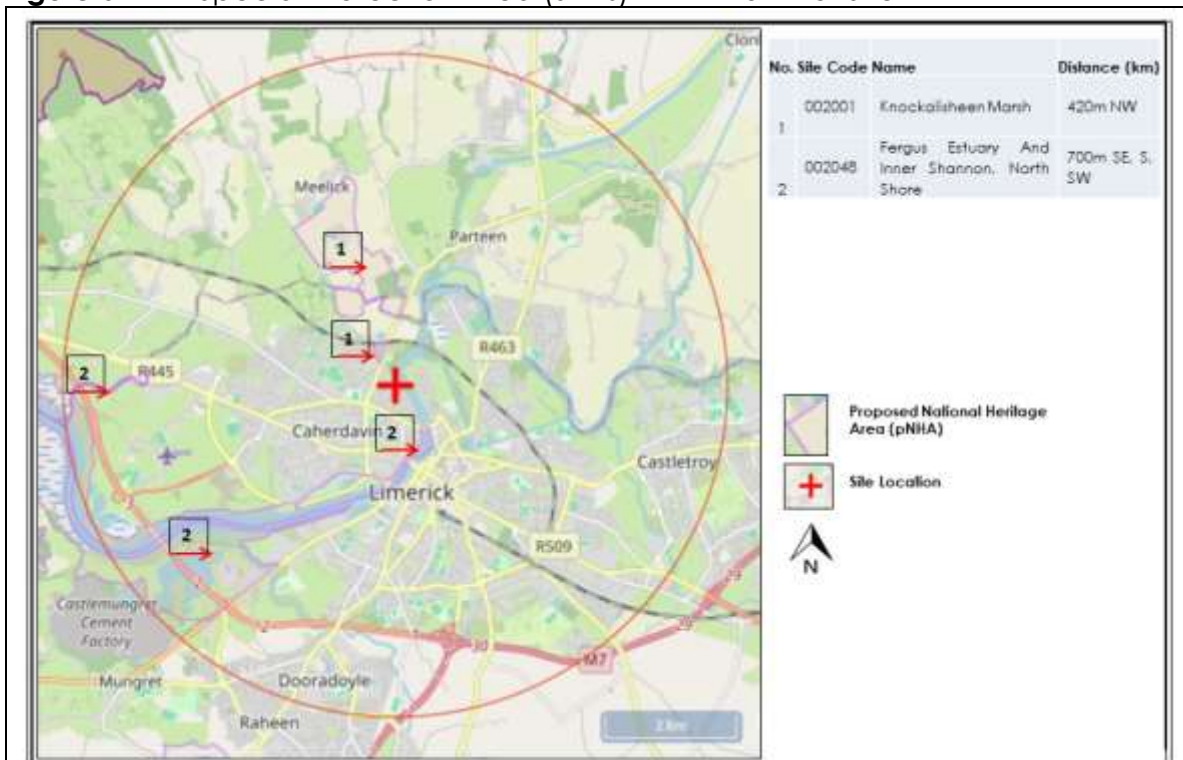


Figure 7 Proposed National Heritage Areas (NHAs) within 5km of Site

3.2 Description of Aspects of the Environment likely to be Significantly Affected

The most likely negative effects on the environment, in the absence of appropriate mitigation measures in place, are:

- Potential accidental spillages during works and contaminated surface run-off;
- Noise and vibration disturbance and air pollution from dust generated from the construction;
- Flood prevention, the design will follow recommendations set out in FRA (Punch Consulting Engineers, June 2023);
- Invasive Species Control onsite will follow recommendations set out in Invasive Species Management Plan (Veon Ecology, May 2023);

Standard best practice procedures and methods are considered sufficient to mitigate construction related impacts.

3.3 Description of any likely Significant Effects on the Environment

3.3.1 Expected Residues and Emissions and the Production of Waste

Residues and emissions from the construction phase of the development will be related to construction waste and dust generation, and potential for contaminated surface run-off from the site during construction.

Waste is expected to consist of rubble and stone from the removal of the internal dividing wall.

Standard best practice procedures will be implemented throughout the proposed works. The removal of waste will be to a suitably licenced facility as required. Due to the small scale nature of works, the impacts of dust generation, and potential for contaminated surface run-off from the site during construction is considered remote.

3.3.2 Use of Natural Resources, in particular Soil, Land, Water and Biodiversity

Natural resources can be expected to be used for the extension to the existing house to a lesser extent. No unusual or excessive use of natural resources is anticipated for the small scale project. There is minimal land-take area to the side of the site into the adjacent area of amenity grassland, however, this habitat type is not of particular importance in terms of biodiversity and ecology.

4.0 EIA Screening

4.1 Screening for Mandatory EIAR

The proposed development is a small scale development comprising of a proposed extension to the side of an existing habitable house. The site is located within an establishing housing estate. There are no sensitive watercourses or Natura 2000 sites on the proposed development site.

The proposed development has a small footprint and does not fall under any category in Schedule 5 (10) of the Planning and Development Regulations (2001) for Mandatory EIAR. Therefore, the proposed development does not trigger a requirement for mandatory EIAR.

4.2 Screening for Sub-threshold EIAR

Development projects which are below the threshold of requiring an EIAR as set out in Schedule 5 of the Planning and Development Regulations 2001 (as amended) may still require an EIAR. Schedule 7 of the Regulations details the criteria that the planning authority must consider in determining whether a sub-threshold EIAR should be undertaken. This schedule is a direct transposition of Annex III of EU Directive 2011/92/EU. The EU Directive 2014/52/EU provides a revised Annex III and its transposition into national legislation is mandatory. Accordingly, Table 1, attached, provides screening statement of the proposed development against the Annex III criteria of 2014/52/EU. These criteria come under three broad headings; Characteristics of projects; Location of Projects; and Types and characteristics of the potential impact. Based on the information provided in accordance with Annex IIA and Annex III of the 2014 Directive, it is considered that a sub-threshold EIAR is not required for the proposed development, as adequate measures are in place to avoid, reduce or mitigate likely impacts, such that neither the construction nor operational phase of the overall development will have a significant negative impact on the environment.

The key issue is: 'are the likely effects 'significant' in the context of these criteria'? An assessment pertinent to Schedule 7 of the Regulations is set out as follows in Tables 1, 2 and 3. The potential impact by EIA topic is outlined in Table 4.

Table 1 Characteristics of the Proposed Development

The characteristics of proposed development, in particular,	Assessment
a) the size and design of the whole of the proposed development,	The project involves refurbishment of an existing building into 2 apartments, demolition of rear extensions and side outbuildings (completed in November 2023) to be replaced with 4 new build apartments/houses, and retention of the rear of the site as floodplain, on a site of 0.125ha. All proposed works will be outside the flood extent line. The scale and design are in keeping with the residential nature of the area and not expected to have significant effects.
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,	No significant in-combination effects are anticipated with other existing or permitted developments in the vicinity, based on a review of available planning information.
c) the nature of any associated demolition works,	Demolition of side outbuildings along the boundary was completed in November 2023, with no asbestos containing materials (ACMs) or habitats noted. Further demolition will involve removal of rear building extensions. The scale of demolition works is minor and not likely to have significant environmental effects when managed with appropriate procedures.
d) the use of natural resources, in particular land, soil, water and biodiversity,	The development will not require the use of natural resources beyond normal quantities for a residential project of this scale. Trees on the boundary with the adjacent dwelling (No. 53 New Road) were cut back by no more than 10-12% in February 2024 for health and safety reasons. The area from the rear building line to the river (within the Lower River Shannon SAC) will be left undeveloped, undisturbed and not landscaped. Effects on land, soil, water and biodiversity are not considered likely to be significant.
e) the production of waste,	Construction waste will be managed by licensed contractors and facilities in line with industry best practice. Operational waste from the occupied development will be handled by standard residential waste collection services. Significant impacts from waste production are not anticipated.
f) pollution and nuisances,	Surface water drainage will likely involve an attenuation tank under the ramp and discharge to the combined sewer, subject to permissions. Piling is not proposed, minimising noise nuisance. Standard construction management practices will be implemented to avoid pollution risks. With these measures, significant pollution or nuisance impacts are not expected during construction or operation.
g) the risk of major accidents, and/or	No particular risks related to major accidents or disasters have been identified, taking into account the scale, location and design of the proposed residential development. The Flood Risk Assessment (Punch

The characteristics of proposed development, in particular,	Assessment
disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge, and,	Consulting Engineers, June 2023) confirms all works will be outside the flood extent. Construction will follow applicable safety regulations and best practices.
h) the risks to human health (for example, due to water contamination or air pollution).	An asbestos refurbishment report was undertaken. The construction will be managed by qualified contractors following industry best practices and regulations to prevent risks to human health from potential air or water pollution pathways. The operational residential development is not expected to give rise to any significant human health risks.

Table 2 Location of the Proposed Development

Location of the Proposed Development The environmental sensitivity of geographical areas likely to be affected by the proposed development, with particular regard to—	Assessment
a) the existing and approved land use,	The subject site and structure is that existing house is on land zoned as 'Existing Residential'. The subject site is situated not within an 'Architectural Conservation Area', where the site is located approx. 700m north of the bridge shown, see Figure 8, with proposed works being minor in nature and not materially affecting the character of the area. The scale, massing, and proportions of the house will be altered to accommodate the extension but will remain within the site boundary. It is not considered that this will have a significant or material effect on the character of the area. Furthermore the proposed works are minor in nature and will not materially affect character of the area. The old pub is not a protected structure ¹ however the front façade will be kept.

¹ Askeaton Local Area Plan 2015-2021

https://www.limerick.ie/sites/default/files/askeaton_local_area_plan_march_2015.pdf

¹ Draft Limerick Development Plan 2022-2028 Volume 3 – Architectural Conservation Areas (June 2021)

<https://mypoint.limerick.ie/en/consultation/draft-limerick-development-plan-2022-2028/chapter/volume-3-architectural-conservation-areas-and-proposed-record-protected-structures>

Location of the Proposed Development The environmental sensitivity of geographical areas likely to be affected by the proposed development, with particular regard to— Assessment



Figure 8 ACA Areas within Limerick closest to Site

An archaeologist desktop review was completed. The dataset of Sites and Monuments (SMR), and National Inventory of Architectural Heritage (NIAH) was checked, see Figure 14. There are no SMR or subjects of AH within the development site. There are two ~220m west of site, see Figure 9 labelled 1 and 2 (both SMR), namely:

1. LI005-015001- : Church : Limerick City, GLEBE (Limerick Municipal Borough)
2. LI005-015002- : Graveyard : Limerick City, GLEBE (Limerick Municipal Borough)

Location of the Proposed Development The environmental sensitivity of geographical areas likely to be affected by the proposed development, with particular regard to— Assessment

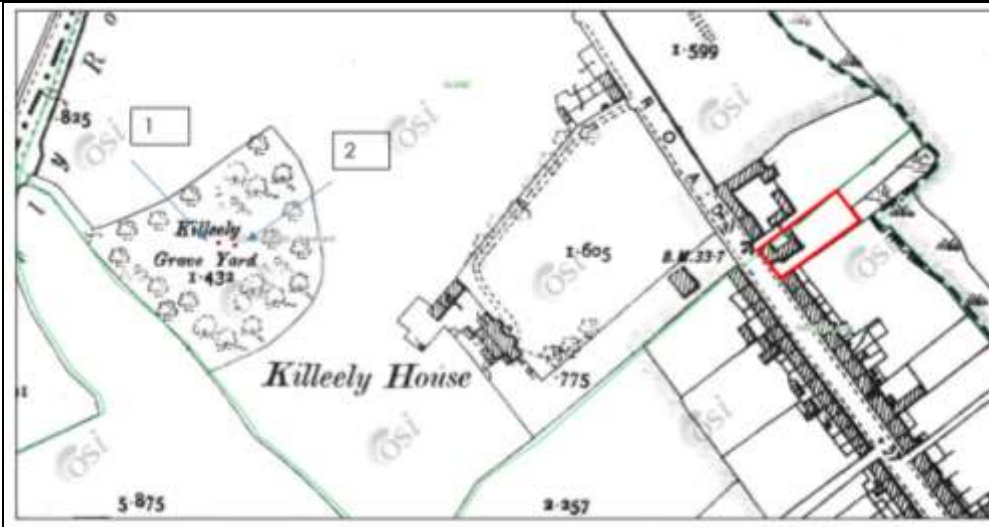


Figure 9 Sites and Monuments and subjects of Architectural Heritage in the vicinity of site

b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground,

Having regard to the receiving environment's character the proposed development will not significantly impact on the integrity of any main habitats (including soil, land, water and biodiversity). The proposed development is situated approximately ~10m from the closest SAC (Lower River Shannon SAC), ~1.4km from the closest SPA (River Shannon and River Fergus Estuaries SPA) and ~420m from the closest pNHA (Knockalisheen Marsh pNHA).

The works are to be managed by a qualified contractor and the construction phase will be carried out in accordance with industry best practice, as per building and environmental regulations. Site procedures to avoid construction site run off to the road gullies located on the housing estate road, to the front of site, will be implemented by the contractor and will be noted in any construction management plan. These works are considered minor in nature and are not likely to have a

Location of the Proposed Development The environmental sensitivity of geographical areas likely to be affected by the proposed development, with particular regard to—	Assessment
<p>c) the absorption capacity of the natural environment, paying particular attention to the following areas:</p> <ul style="list-style-type: none"> (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 and; (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; (viii) landscapes and sites of historical, cultural or archaeological significance. 	<p>significant effect on the environment.</p> <p>The subject site is located approximately 30m from the banks of the River Shannon, however there is no direct hydrological connection to the river e.g. open drains onsite. It is considered that the development will not be likely to lead to significant effects on the absorption capacity of same as the existing surface water management provisions will remain largely unchanged.</p> <p>The development site is partially located within Flood Zones A and B, as indicated in the Flood Risk Assessment (FRA) prepared by Punch Consulting Engineers (June 2023). The FRA recommends setting minimum finished floor levels at 5.82m OD, which is above the 0.5% AEP coastal flood level with allowances for climate change and freeboard. All proposed construction works will be located outside the flood extent line. With the implementation of the flood risk management measures outlined in the FRA, such as appropriate finished floor levels, emergency access/egress routes, and a Flood Emergency Response Plan, the site is considered to be at low risk of flooding and will not increase flood risk elsewhere.</p> <p>Invasive species, including Japanese knotweed and Giant hogweed, have been identified on site. Treatment of these species commenced in April 2023 using the injection method and is currently in its second year of a four-year program. The Invasive Species Management Plan (Veon Ecology, May 2023) outlines control measures to be implemented during construction to prevent the spread of these species to the nearby Lower River Shannon SAC.</p> <p>The works will be managed by qualified contractors and carried out in accordance with industry best practices and relevant building and environmental regulations. A Construction Environmental Management Plan (CEMP) will be prepared to detail site procedures for preventing pollution, managing invasive species, and minimising the risk of construction site run-off to nearby road gullies.</p> <p>Given the implementation of the FRA recommendations, adherence to the Invasive</p>

Location of the Proposed Development The environmental sensitivity of geographical areas likely to be affected by the proposed development, with particular regard to— Assessment

Species Management Plan, and the application of best practice construction management measures, the proposed development is not likely to have a significant effect on the absorption capacity of the natural environment or on areas of historical, cultural, or archaeological significance.



Figure 10 Flood Map

Table 3 Types and Characteristics of Potential Impacts

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—	Assessment
a) the magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected),	The proposed development is located within an urban setting in Thomondgate, Limerick. The geographical extent and population likely to be affected are limited to the immediate vicinity of the project site, primarily the adjacent properties and nearby residents. Given the small scale of the development and its location within an existing built-up area, the magnitude and spatial extent of potential impacts are considered to be relatively low.
b) the nature of the impact,	Potential impacts during construction may include increased noise, vibration, dust, and traffic, as well as potential risks to water quality and the spread of invasive species. These impacts are expected to be temporary, localized, and can be effectively mitigated through the implementation of standard construction best practices and adherence to the recommendations of the Flood Risk Assessment and Invasive Species Management Plan. Operational impacts are likely to be limited to a minor increase in local traffic and demand on utilities and services, which are not expected to be significant given the scale of the development and its location within an existing residential area.
c) the transboundary nature of the impact,	Given the location and scale of the proposed development, no transboundary impacts are anticipated. All potential impacts are expected to be limited to the immediate vicinity of the site and are unlikely to extend across national borders.
d) the intensity and complexity of the impact,	The intensity and complexity of potential impacts are considered to be relatively low. Construction-related impacts, such as noise, dust, and traffic, are expected to be temporary and can be effectively managed through standard mitigation measures. The operational phase of the residential development is not likely to result in complex or intense impacts on the environment.

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—	Assessment
e) the probability of the impact,	The probability of construction-related impacts, such as increased noise, dust, and traffic, is high. However, these impacts are well understood and can be effectively mitigated through the implementation of a Construction Environmental Management Plan and adherence to best practices. The probability of significant operational impacts is considered to be low, given the nature and scale of the proposed development and its location within an existing built-up area.
f) the expected onset, duration, frequency and reversibility of the impact,	Construction-related impacts are expected to commence once development works begin and will be temporary, lasting only for the duration of the construction phase. These impacts will be intermittent and reversible, with the affected environment expected to return to its pre-construction state once works are completed. Operational impacts, such as minor increases in local traffic and demand on utilities and services, will commence upon completion of the development and are expected to be long-term but relatively low in intensity and frequency.
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, and	Based on a review of available planning information, no significant cumulative impacts are anticipated in combination with other existing or permitted developments in the vicinity. The proposed development is relatively small in scale and is not expected to contribute significantly to any cumulative environmental impacts in the area.
h) the possibility of effectively reducing the impact.	The potential impacts associated with the proposed development can be effectively managed and reduced through the implementation of appropriate mitigation measures, including:

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—	Assessment
	<ul style="list-style-type: none"> • Adherence to a Construction Environmental Management Plan and best practices to minimise noise, dust, vibration, and traffic impacts during construction. • Implementation of the recommendations from the Flood Risk Assessment to mitigate potential flooding impacts. • Following the Invasive Species Management Plan to control and prevent the spread of invasive species. • Compliance with relevant building and environmental regulations. <p>By implementing these measures, the possibility of effectively reducing the identified impacts is considered to be high.</p>

Table 4 Potential Impacts by EIA Topic

Topic	Comment on Potential Impacts
Population and Human Health	The potential impacts of the construction phase on human health 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 works will be short-term, and standard best practice construction methodologies will limit disturbance to people in the area. Once completed, the proposed development will provide additional housing, which is a significant positive impact.
Biodiversity / Species and Habitats	The Screening for Appropriate Assessment report (AEE, May 2024) concluded no potential direct or indirect impacts to species and habitats of Natura 2000 sites. Demolition of buildings will occur outside the bird nesting season (March 1st to August 31st) to avoid impacts on nesting birds. Invasive species (Japanese knotweed and Giant hogweed) will be managed according to the Invasive Species Management Plan to prevent spread. No significant impacts are anticipated with the implementation of these measures.
Lands and Soils	No significant impact; the development will be constructed in accordance with best practice environmentally sensitive methods and environmental management systems. A ground investigation report was conducted for the site.
Water	With best practice incorporated into the design and construction works, the potential for significant run-off of pollutants is either eliminated or greatly reduced. No significant residual impacts on water are anticipated. The Flood Risk Assessment (Punch Consulting Engineers, June 2023) recommends measures to mitigate flood risk, including setting appropriate finished floor levels. Foul water will be discharged into the public mains, and Irish Water has confirmed capacity for the connection.
Air & Climate	During construction, there is the potential for short-term minor negative impacts related to dust. However, this will be short-term and limited to the works area. Best practice construction site management will minimize emissions. No significant long-term impacts are anticipated.
Noise and Vibration	Potential short-term noise impacts may arise during construction activities; however, this will be managed through best practice measures. Piling is not proposed for this project, reducing potential noise and vibration impacts. No significant impact is anticipated.
Material Asset: Built Environment	The proposed development will connect to existing public services (water mains and utilities). Possible effects include short-term interruption to existing services and potential damage to existing systems during construction. No significant impacts are anticipated with the implementation of appropriate construction management measures.

Topic	Comment on Potential Impacts
Material Asset: Transportation	There will be no significant long-term impact 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	No significant effects are anticipated. The development will involve demolition of existing structures and limited excavation. Possible effects include the re-use, recycling, or disposal of demolition waste, excavated material, and domestic waste once occupied. An asbestos refurbishment report was conducted. Best practice in construction, demolition, and operational waste management procedures will be implemented.
Cultural Heritage	The proposed development will not give rise to any significant impacts on cultural heritage. The site is not located within an Architectural Conservation Area and does not contain any protected monuments, structures, or listed buildings. The front façade of the existing pub building will be retained.
Landscape	No significant effects are anticipated. The proposed housing development is located within an existing urban area and will not give rise to any significant landscape or visual impacts. There are no protected views or designated scenic routes pertaining to the site, and there will be no significant change in terms of site visibility.
Interactions	No significant effects are anticipated when considering interactions between all factors considered.

5.0 Conclusion

This report has assessed the potential impact of the proposed housing development at 52 New Road, Thomondgate, Limerick on the environment to allow the Competent Authority (CA) to prepare an EIA Screening Conclusion Statement. The report has assessed the potential impact of the proposed development on the environment. The proposed development does not fall under any category within Schedule 5 (10) of the Planning and Development Regulations (2001) for Mandatory EIAR. The screening exercise has been completed in this report and the methodology used has been informed by the available guidance, legislation and directives.

A Screening for Appropriate Assessment (AA) compiled for this project by AEE (May, 2024) considered potential impacts on Natura 2000 sites in the locality. The Screening for AA determined that there was no potential for significant impacts on any Natura 2000 site. Their conclusion was as follows:

“According to NPWS (2009), the Appropriate Assessment Screening exercise can either identify that an Appropriate Assessment is not required; or that there is no potential for significant effects (i.e. Appropriate Assessment is not required); or that significant effects are certain, likely or uncertain (i.e. the project must either proceed to Stage 2 (AA) or be rejected).

The Lower River Shannon SAC, approx. 10m northeast of the site, were assessed for impacts from the proposed works and all impacts were screened out.

These complete, precise and definitive findings, based on the best available scientific evidence, remove all reasonable scientific doubt that the proposed works will have any significant impacts on the Natura 2000 sites detailed above; and it is therefore concluded that there will be no likely significant negative impacts caused to any Natura 2000 sites as a result of the proposed works. A Natura Impact Statement (NIS) is not required.”

A Bat Survey (AEE, May 2023) found no bats emerging from the buildings, though mitigation such as bat boxes are recommended. The Bird Survey (AEE, January 2024) recorded no species linked to nearby SPAs and advised mitigation for nesting birds such as nest boxes.

The Flood Risk Assessment (Punch CE, June 2023) recommended setting appropriate finished floor levels and preparing a Flood Emergency Response Plan. The Invasive Species Management Plan (Veon Ecology, May 2023) outlined control measures for Japanese knotweed and Giant hogweed onsite. A CEMP should be developed by the contractor for the proposed development to incorporate the relevant best practice procedures to be adhered to throughout the construction works. A CEMP is considered sufficient to ensure that the minor potential construction phase impacts, regarding surface run-off, waste generation, introduction and control of existing invasive species and nuisance impacts such as dust, noise and vibrations will be minimised and effectively reduced to imperceptible.

The EIA Screening Assessment has therefore determined that a sub-threshold EIAR is not required as the proposed development is small in scale and the site is of no particular ecological importance.

In summary, the need for Environmental Impact Assessment can, therefore, be excluded on the grounds that:

- The proposal is substantially below relevant mandatory EIA thresholds.
- There are no potential cumulative or in combination effects likely to arise.
- There will be no impacts to the Natura 2000 network.
- There is no real likelihood of significant effects on the environment arising from the proposed development.