

Deerpark Adare EIA Screening Report

Final Report

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Comhairle Cathrach
& Contae **Luimnigh**

Limerick City
& County Council

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Contract

This report describes work commissioned by Dereck McNamara, on behalf of Limerick City and County Council (LCCC), by a letter dated 11th June 2019. Hannah Mulcahy and Jean Hamilton of JBA Consulting carried out this work.

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Purpose

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Abbreviations

AA	Appropriate Assessment
ABP	An Bord Pleanala
AEP	Annual Exceedance Probability
EIAR	Environmental Impact Assessment Report
EC	European Commission
FW	Foul water
GSI	Geological Survey Ireland
LAP	Local Area Plan
LCCC	Limerick City and County Council
NIAH	National Inventory of Architectural Heritage
pNHA	proposed Natural Heritage Area
PE	Population Equivalent
SAC	Special Area of Conservation
SPA	Special Protection Area
SW	Storm water

1 Introduction

JBA Consulting Engineers and Scientists Ltd. (hereafter JBA) was commissioned by Limerick City and County Council (LCCC) to prepare an EIAR Screening Document for a proposed residential development in Deerpark, Adare, Co. Limerick. The development comprises 39 residential units (including 8 affordable sites).

1.1 Purpose of this Report

The purpose of this report is to identify whether there is a need under The Planning and Development Act 2000, as amended, for an EIAR for the proposed works.

Schedule 5 (Parts 1 and 2) of the Act lists the groups of development projects which are subject to different EIAR screening requirements. Those listed in Part 1 are automatically subject to an EIAR under the EU Directive 85/337/EEC due to the scale and nature of the project which has deemed to have significant environmental impacts. Part 2 lists projects which are also likely to have significant environmental effects based on the nature and size of the development set out by threshold criteria. An additional group of projects, which are considered sub-threshold developments under Part 2, may fall below the thresholds set but may under further analysis be deemed to have significant environmental effects due to their location within a catchment, size, or proximity to sensitive areas.

This report documents the methodology employed to determine whether the proposed development falls under any of these groups, and therefore will have significant environmental impacts. Rationale has been given for the decision made in reference to the relevant legislation, and additional documents have been referenced where required.

This EIAR Screening Report is based on the following documents:

- *'Ecological Constraints Report for Housing Project in Adare, Limerick'* prepared by OPENFIELD Ecological Services on behalf of Limerick City and Council (Openfield Ecology 2016)
- *'Screening Report for Appropriate Assessment for housing project in Adare, Limerick'* prepared by OPENFIELD Ecological Services on behalf of Limerick City and Council (Openfield Ecology 2019)
- *Archeological Test Trenching Report for Proposed Housing Development, Deerpark, Adare* prepared by John Cronin & Associates on behalf of Carr Cotter & Naessens Architects (Cronin 2017).
- *Archeological Test Trenching Report II for Proposed Housing Development, Deerpark, Adare* prepared by John Cronin & Associates on behalf of Carr Cotter & Naessens Architects (Cronin 2018)
- *Tree Survey Report for Deerpark, Adare* prepared by Arbor-care (Ltd) Professional Consulting Tree Service for Limerick City and County Council (Arbor-care 2019)
- *Bat Survey Report for Deerpark, Adare Housing Development* by JBA Consulting for Limerick City and County Council (JBA Consulting 2019)
- *Traffic and Transport Assessment of Proposed Deerpark Residential Development (Option 3), Adare, County Limerick* for Carr Cotter & Naessens Architects, on behalf of Limerick City and County Council (Malachy Walsh 2018)
- Site layout plans prepared by Limerick City and County Council
- Drainage prepared by Limerick City and County Council
- Landscape Plans prepared by JBA Consulting
- Lighting design prepared by Malachy Walsh and Partners
- Adare Local Area Plan (2015-2021) (LCCC 2015)

2 Description of Proposed Works

2.1 Site Location

The location for the Project is Deerpark, Adare, County Limerick. The proposed housing development will be spread over two separate areas shown overleaf in Figures 2.1-2.4, on a greenfield site located on the southwestern approach to Adare town with each area being accessed independently off the N21. Originally part of Deerpark, an established woodland, the southern end of the site (Area 2) includes a stone-faced boundary wall and existing entrance point off the N21. The Adare Local Area Plan 2015-2021 (LCCC 2015) has designated this site as Residential Development Area phase 1.

The narrow plot to the North of the site (Area 1) extends from the Deerpark site proper to the N21 opposite the primary school, Scoil Naomh Iosaf. A carpark and attenuation tank are currently constructed to the eastern end of Area 01 as part of the N21 Adare Western Approach Improvement Scheme (B75I4668 & B75I4680). As part of the project brief this carpark is to be reconfigured to provide for a new entrance point and road network that will service the proposed housing scheme and provide access to other backlands while accommodating the same number of car parking spaces. The land falls towards the eastern boundary, includes a number of mature oak trees spread intermittently throughout, and to the northern edge is in close proximity to a playing field, an existing small housing estate and an overgrown lime kiln.

2.1.1 Proposed development

The proposed development comprises:

- Provision of 7 no. single storey residential units, 18 no. 2 storey residential units, 6 no. apartment units and 8 no. plots for affordable housing. The unit mix comprises; 2 no. single bedroom units, 17 no. 2 bedroom units, 12 no. 3 bedroom units. Total 39 residential units (including 8no. affordable sites)
- New street connecting proposed scheme with Existing Deerpark Estate, new street connections to the N21, associated footpaths, the reconfiguration of the existing carpark (33 no. spaces) and the provision of new car parking (59 no. spaces);
- Hard landscaping including; homezone areas, bin stores, privacy strip to front gardens, rear garden walls and installation of street lighting;
- Soft landscaping including planting and trees;
- Construction of and / or remedial works to boundaries with adjacent sites;
- Construction of new watermain, new foul sewer connection, storm sewer and surface water drainage systems;
- Connection to public utilities;
- All associated site works.

The proposed site layout is shown in Figure 2-2, layout of the north site in Figure 2-3, and layout of the south site in Figure 2-4.

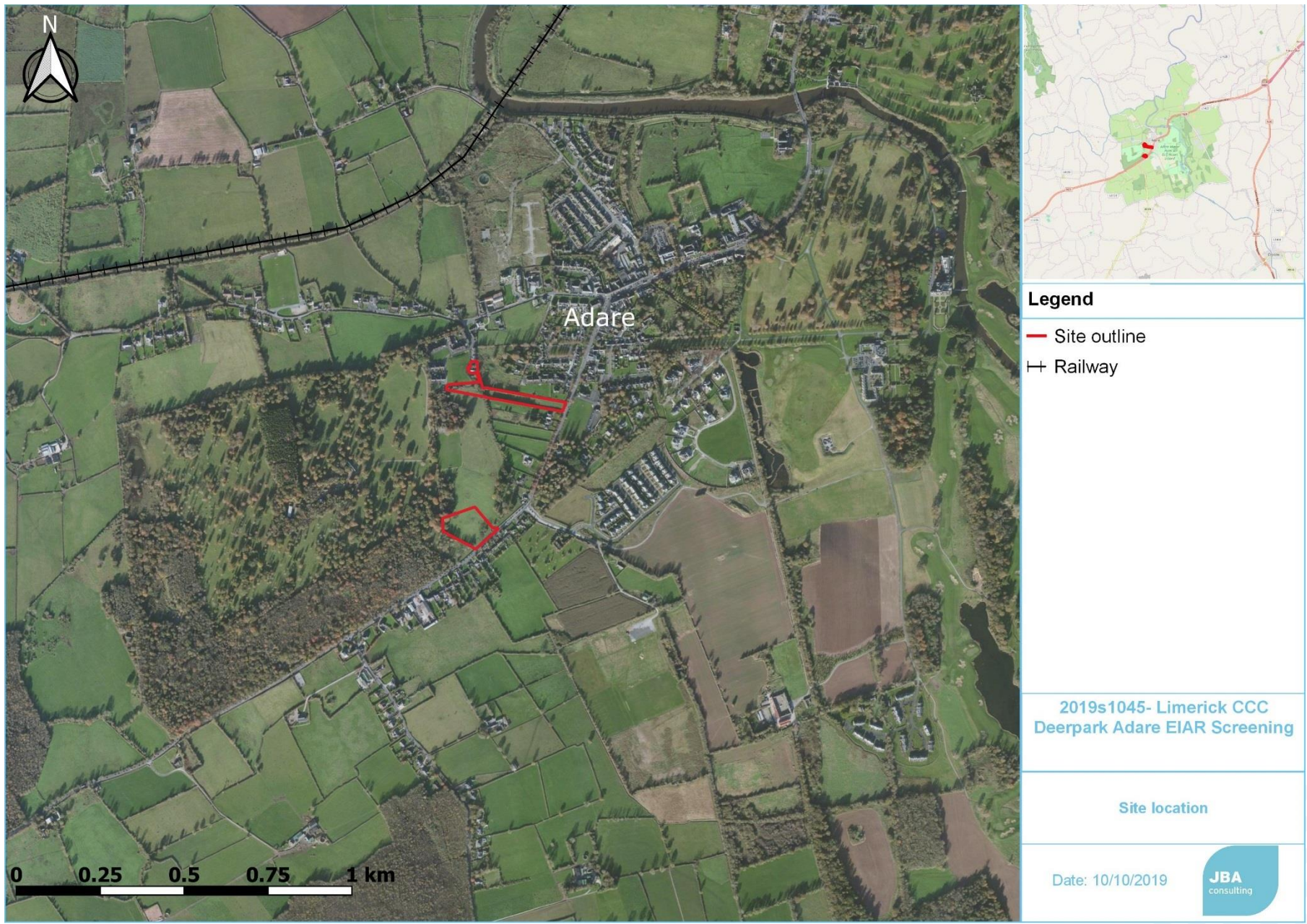


Figure 2-1 Site (north and south) location in Village of Adare

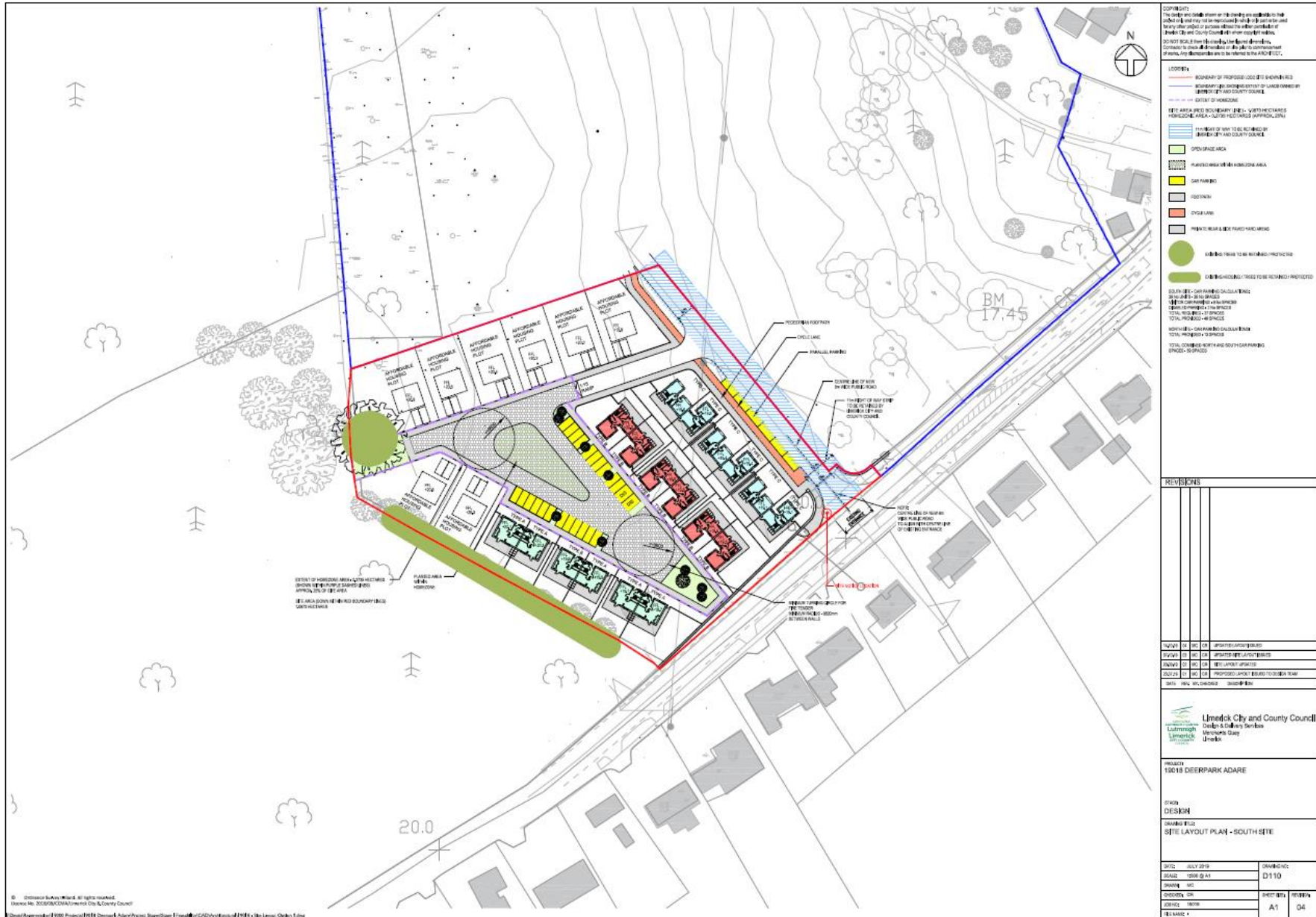


Figure 2-4 Phase 1 development, south site

2.1.2 Drainage plans

The proposed development will require constructing new surface water and foul water drainage networks, which will link to established SW and FW drainage network in Adare.

This will involve a new dedicated surface water sewer network, to fall by gravity, and at the south site this will divert through an attenuation tank.

The foul sewer network leads to Adare Wastewater Treatment Plant, situated adjacent to the River Mague. This plant was upgrading in 2007 for a capacity of 2,500 Population Equivalent, with the current estimate at 1,300 PE (LCCC 2015).

The proposed drainage layout at the north site will connect to the existing stormwater and foul water systems of Deerpark housing estate to the north of the site.

Drainage plans (5 nr) are included in the Appendix A.

3 Purpose of Screening

3.1 Legislative Context for EIAR in Ireland

The EU sets out mandatory requirements for Environmental Impact Assessments under the EIA Directive 85/337/EEC (as amended by Directive 97/11/EC). The Directive identifies that certain project types, described under Annex I, will always have significant environmental effects due to their nature and size. These projects are required to undergo an EIAR in every Member State.

For projects listed under Annex II, the EIA Directive gives Member States discretion to decide the limits of projects requiring an EIAR. In Ireland, mandatory thresholds have been set for projects that would otherwise fall under Annex II, which are described in Schedule 5 of The Planning and Development Regulations 2001 as amended. These thresholds are based on project characteristics including size and location. Projects within these thresholds are always subject to an EIAR. In some circumstances, projects considered below the thresholds set under Schedule 5 Part 2 may still be considered by the Planning Authority to have significant effects on the environment, such as in cases where the projects are in a location of particular environmental sensitivity and may also be subject to an EIAR. These sub-threshold projects are reviewed by the Planning Authority on a case-by-case basis.

The principal piece of legislation under which an EIAR may be undertaken for various developments is The Planning and Development Act 2000, as amended. Further regulations are explained in The Planning and Development (Environmental Impact Assessment) Regulations 2001-2018.

Legislation is examined below as to whether an EIAR will be required for this project.

3.2 The Planning and Development Act 2000 – Mandatory EIAR

The Planning and Development Act 2000, as amended, Section 172 sets out the types of projects that require an Environmental Impact Assessment Report (EIAR):

An environmental impact assessment shall be carried out by the planning authority or the Board, as the case may be, in respect of an application for consent for proposed development where either:

- a. the proposed development would be of a class specified in
 - i. Part 1 of Schedule 5 of the Planning and Development Regulations 2001, and either-
 - I. such development would exceed any relevant quantity, area or other limit specified in that Part, or
 - II. no quantity, area or other limit is specified in that Part in respect of the development concerned, or
 - ii. Part 2 of Schedule 5 of the Planning and Development Regulations 2001 and either-
 - I. such development would exceed any relevant quantity, area or other limit specified in that Part, or
 - II. no quantity, area or other limit is specified in that Part in respect of the development concerned, or
- b.
 - i. the proposed development would be of a class specified in Part 2 of Schedule 5 of the Planning and Development Regulations 2001 but does not exceed the relevant quantity, area or other limit specified in that Part, and
 - ii. the planning authority or the Board, as the case may be, determines that the proposed development would be likely to have significant effects on the environment.

3.2.1 Part 1 of Schedule 5 of the Planning and Development Regulations 2001-2018

The proposed residential development does not fall under Schedule 5, Part 1. The projects under Part 1 are typically large infrastructure and energy projects and by their nature will always have significant environmental effects.

3.2.2 Part 2 of Schedule 5 of the Planning and Development Regulations 2001-2018

With regards to Part 2 projects, the categories and thresholds were examined, for the following category:

10. Infrastructure projects

- (a) Industrial estate development projects, where the area would exceed 15 hectares.
 - (b) (i) Construction of more than 500 dwelling units.
 - (ii) Construction of a car-park providing more than 400 spaces, other than a car-park provided as part of, and incidental to the primary purpose of, a development.
 - (iii) Construction of a shopping centre with a gross floor space exceeding 10,000 square metres.
 - (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.)

As the proposed development consists of 39 housing units (less than 500 units in 10b above) and the site area is 2.8ha (not in a business or built-up area so, it is therefore less than 20 hectares elsewhere) and does not fall under any of these categories. Therefore, an EIAR has not been automatically triggered for this proposed development.

However, it is necessary to consider if this development could result in significant environmental effects under the category of sub-threshold developments.

3.3 Planning and Development Regulations 2001-2018 Sub-threshold EIAR

In accordance with Article 103 of the Planning and Development Regulations 2001-2018 (Requirement to submit EIAR with sub-threshold planning application), where a planning application for sub-threshold development is not accompanied by an EIAR, and the Planning Authority considers that the development is likely to have significant effects on the environment it shall, by notice in writing, require the applicant to submit an EIAR. This process therefore occurs after submission of an application, if that application is not accompanied by an EIAR.

The decision as to whether a development is likely to have 'significant effects' on the environment must be taken with reference to the criteria set out in Schedule 7A of the Planning and Development Regulations 2001-2018. Schedule 7A requires that the following information be provided for the purposes of screening sub-threshold development for EIAR:

1. A description of the proposed development, including in particular—
 - a. a description of the physical characteristics of the whole proposed development and, where relevant, of demolition works, and
 - b. a description of the location of the proposed development, with regard to the environmental sensitivity of geographical areas likely to be affected.
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 resulting from—

- a. the expected residues and emissions and the production of waste, where relevant, and
- b. the use of natural resources, in particular soil, land, water and biodiversity.
- c. The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7 of the Planning and Development Regulations 2001-2018 (DHPLG 2018a).

In order to assist planning and other consenting authorities in deciding if significant effects on the environment are likely to arise in the case of development below the national mandatory EIAR thresholds, the Minister for the Environment, Heritage and Local Government published a Guidance document in August 2003 Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding Sub-threshold Development and the Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (DHPLG 2018b)

The criteria, as transposed in Irish legislation, are grouped under three headings:

- i. Characteristics of Proposed Development
- ii. Location of Proposed Development
- iii. Characteristics of Potential Impacts

For the purposes of assessing if the development is likely to have significant effects on the environment in reference to these three parameters, the project is described in chapter 5 in further detail.

4 Overview of Environmental Impacts

An overview of the potential impacts according to theme (as presented in an EIAR) are provided below and shown in Figure 4-1 Site Boundary and constraints map.

4.1 Biodiversity

4.1.1 Protected Sites

The site is not in or directly bordering any Natura 2000 sites (NPWS 2018). The following sites are within 15km of the site:

Natura Site	Site Code	Distance from site
Lower River Shannon SAC	002165	690m
Curraghchase Woods SAC	000174	4.6km
River Shannon and Fergus Estuaries SPA	004077	6.7km
Askeaton Fen Complex SAC	002279	6.8km
Tory Hill SAC	000439	7.4km

An AA Screening Report (Openfield Ecology 2019) was completed for this development. It was determined that the development is not likely to have significant impacts on any of these protected sites, on its own or in combination with other projects.

The south site borders the Adare Woodlands protected Natural Heritage area (NPWS 2018). The following nationally protected sites have been identified within 15km of the site:

Protected site	type	Site Code	Distance from site
Adare Woodlands	pNHA	000429	Adjacent
Curraghchase Woods	pNHA	000174	4.6km
Tory Hill	pNHA	000439	7.5km
Inner Shannon Estuary	pNHA	000435	8.1km
Ballinvirick Marsh	pNHA	001427	6.9km
Cappagh Fen	pNHA	001429	7.9km
Gorteenamrock	pNHA	001433	7.8km
Dromore and Bleach Loughs	pNHA	001030	7.6km

4.1.2 Tree survey

Many large, mature trees are situated within the boundary of the proposed sites, and within the boundary of field that the proposed sites are situated. These trees are described in the Adare Local Area Plan (LCCC 2015) in Objectives EH9 and EH10:

Objective EH9: Trees on lands zoned residential phase 2 and residential serviced sites phase 2 located in the townland of Adare, north of the N21 There are a significant proportion of existing trees on the land zoned as phase 2 residential and phase 2 serviced sites in the townland of Adare. Any future development on these lands shall incorporate as many of the trees as possible into the scheme. A comprehensive tree survey carried out by a suitably qualified person shall be submitted with any future planning application.

Objective EH10: Tree Protection and Nature Conservation It is the objective of the Council to protect natural stone boundary walls, mature trees, woodlands and hedgerows. Development that requires the felling or harming of such trees shall not normally be permitted unless otherwise supported by a tree survey report establishing that the subject trees are of no ecological or amenity value. Such report shall be undertaken by a suitably qualified and competent person.

A Tree Survey has been completed for this site (Arbor-care 2019). The survey report identified a large number of mature trees of high to moderate quality to be retained, and a small number of Sycamore and dead Oak to be removed. Some hawthorns and small stretches of hedgerows have also been identified to be removed.

A summary of tree removal is as follows:

- T788 – To be removed
- T786 – To be removed– mitigation measures include the planting of two semi-mature oak trees to compensate for its loss.
- T789 – To be removed – It is anticipated this tree will have to be removed in order to accommodate for required drainage service lines and a connecting road between the proposed linear development strip and the existing Deerpark estate. While the designers had endeavoured to keep this tree the required road levels as dictated by the existing levels to the front of the lime kiln (which we intend to rehabilitate and preserve as part of this proposal) require a level cut and retention between the proposed road and the existing green open space which will most likely undermine the root system as indicated in the RPA. In conjunction with the proposed road there are also planned service routes through this area. The positioning of these service routes was dictated by the need to tie into services available in the existing Deerpark Estate while avoiding excavation works through quarry lands to the north west (slit trenches were carried out to determine the start of the quarry). These proposed drainage connections will service not only the planned LCCC scheme but have been sized appropriately to accommodate potential future housing developments opening up development opportunities for a number of backland sites near the Adare village core. These proposed services are in accordance with Adare’s LAP objective ‘to provide for development which accommodates envisaged housing need and density to sustain vibrant socially balanced communities’.

4.2 Soils and Geology

The underlying bedrock of the site is composed of Waulsortian Limestones with a quaternary sediment layer of tills derived from limestones (GSI 2019).

4.3 Hydrology and Hydrogeology

The Water Framework Directive Groundwater body that this site is situated in is Fedamore IE_SH_G_084. The groundwater recharge has a Moderate permeability subsoil overlain by well-drained soil (GSI 2019).

4.4 Cultural Heritage

The proposed development borders the historical village of Adare, which has been designated a Heritage Town. It boasts major historic attractions including Desmond Castle, Adare Manor, Augustinian Priory, Franciscan Abbey and Trinitarian Abbey.

Archaeology reports (Cronin 2017 and 2018) have been produced for the majority of the site (using an earlier site boundary), which found there was no evidence of unrecorded archaeological features or artefacts during metal-detecting survey or the test trench excavations and metal-detecting survey undertaken within the site boundary.

There is a Lime Kiln at the north of the site that is not listed on NIAH or National Monuments site but is noted on the Historic 25-inch map (1888-1913), and still stands today. See location of the Lime Kiln in Figure 4-1 and 4-2 overleaf.

The Archaeological Report (Cronin 2017) for the northern part of the site did not include the area of the Lime Kiln.

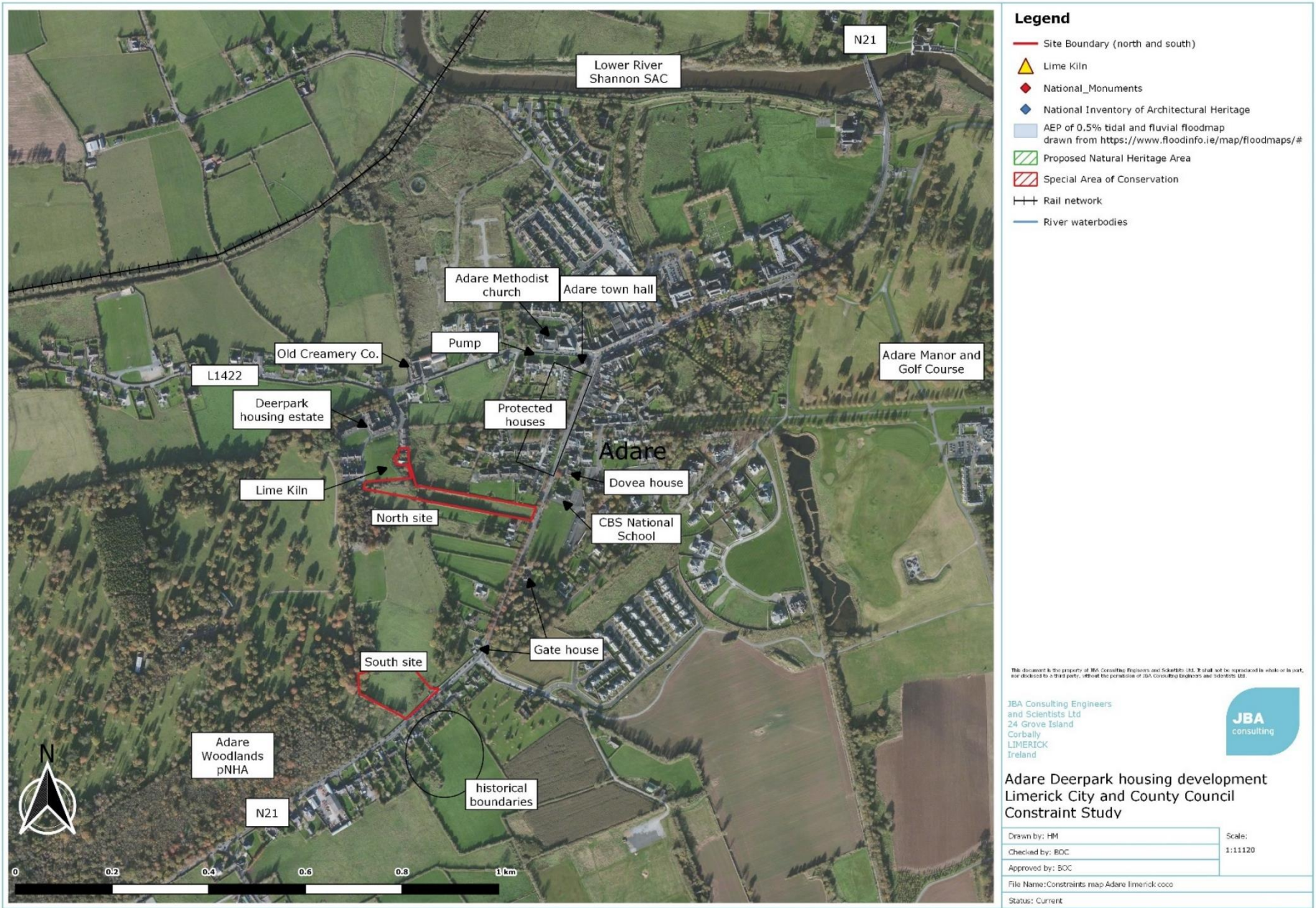


Figure 4-1 Boundary and constraints map

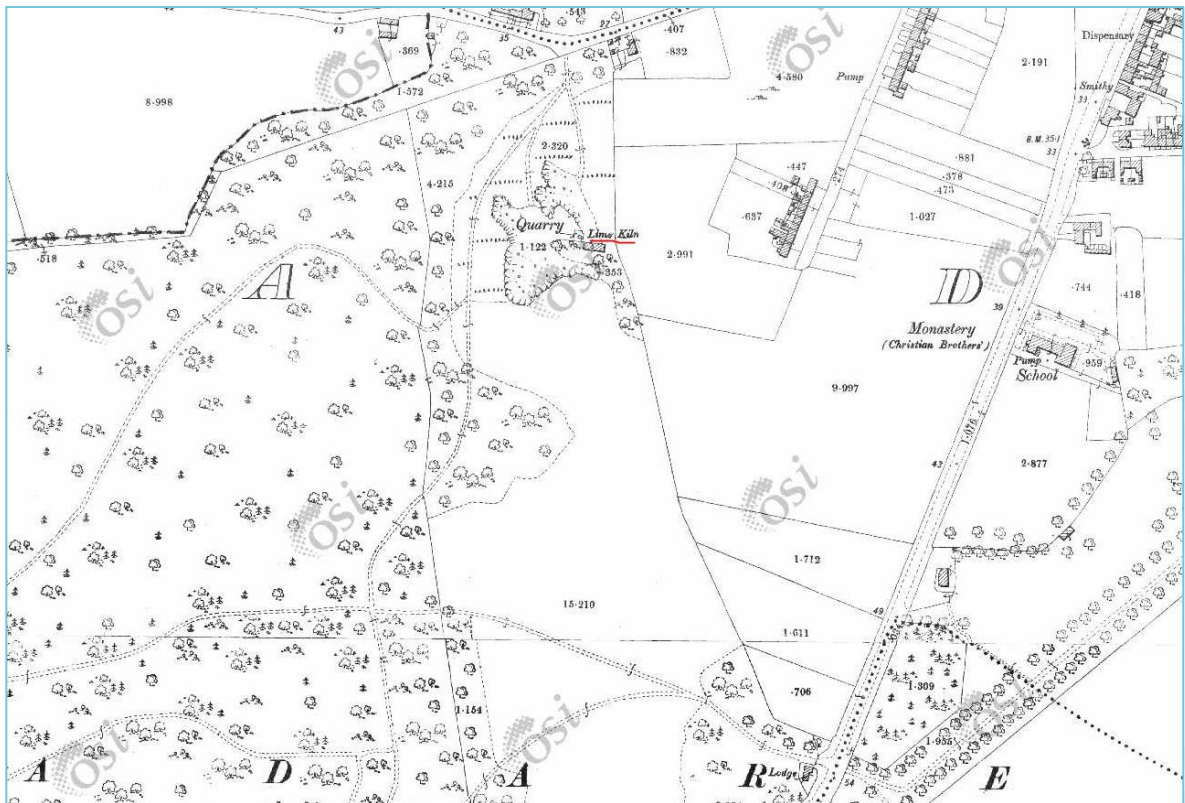


Figure 4-2 Historic 25-inch map (1888-1913) with location of Lime Kiln next to a quarry

There are no other cultural heritage features identified within the site boundary. The nearest site of importance is a levelled enclosure (LI021-156001-) located c.70m to the south on the opposite side of the N21 road, listed by National Monuments. There is a 1790-1810 Gate lodge (Reg. No. 21824015) listed by the National Inventory of Architectural Heritage to the south east of the south site. Other nearby cultural heritage features are shown on the)(drawn from data from heritagemaps.ie 2019).

4.5 Cumulative Impacts

4.5.1 Foynes to Limerick Road Scheme (including Adare Bypass)

This Road Scheme covers approximately 45 km of the N21 from Kilkinlea Lower, Abbeyfeale to Garraunboy and will incorporate bypasses for the towns of Abbeyfeale and Newcastle West. Adare will be bypassed by this road scheme.

Application to An Bord Pleanala is pending, but pressure to complete the road before the Ryder Cup 2026 event in Adare Manor has meant this road scheme is 'fast tracked' to be completed by 2024.

This road scheme will alleviate the traffic in Adare, which is a significant bottleneck on the N21 road.

4.5.2 Development of adjacent site, Planning Code: 19/684

A housing development of 17 residential units will be composed of the following:

- (a) 8 no. two storey 4-bed semi-detached dwellings, and
- (b) 1 no. residential block (part 2 storey, part 3 storey) consisting of

- (i) 6 no. 2-bed terraced townhouses over ground & first floor,
- (ii) 2 no. 3-bed terraced townhouses over ground & first floor, and
- (iii) 1 no. 3-bed apartment on second floor, together with new pedestrian and vehicular entrance access via existing public car park, boundary treatments, landscaping, and all ancillary site works

Further information has been requested by Limerick CCC on the 29/08/2019.

5 Screening Assessment

5.1 Characteristics of the Proposed Development

To determine whether the characteristics of the proposed development are likely to have significant impacts on the environment, the following questions were answered in Table 5-1. Characteristics of the Proposed Development, following guidelines set out in Guidance for Consenting Authorities regarding Sub-Threshold Development (DoEHLG 2003).

Table 5-1. Characteristics of the Proposed Development

Characteristics of the Proposed Development - Screening Questions	Comment
Could the scale (size or design) of the proposed development be considered significant?	No. The development will cover an area of approximately 2.9ha (north site – 1.8ha, south site – 1.08ha)
Considered cumulatively with other adjacent proposed developments, would the size of the proposed development be considered significant?	No. The size of the development is considered small. An existing housing development in Deerpark estate is situated to the north. A proposed housing development (by others) of approx. 40 units will be built between the north and south sites, and will connect mains systems, roads and pathways. The site has been designated by the Adare Local Area Plan for residential development.
Will the proposed development utilise a significant quantity of natural resources, in particular land, soil, water or biodiversity?	No. In terms of land take, the area is small (2.8ha), and much of this area will be dedicated to open space. All mature trees and hedgerows will be maintained where possible. Lighting design will also be provided (Appendix C).
Will the proposed development produce a significant quantity of waste?	No. Waste will be produced only during the construction phase of the development. During this phase, should excavated material require off-site removal, these materials will be tested to determine the most appropriate means of disposal and disposed at appropriately licenced or permitted sites. During operation, the proposed development will produce household waste, which will be sorted at a central waste management area and brought off site for disposal/recycling at appropriate facilities. A new stormwater system will be constructed for the site to direct water from road surfaces to pass through a petrol/oil interceptor and discharged to an attenuation tank before entering the River Maigue. The site-specific drainage plans are detailed in Appendix A. Foul water will connect to the sewer system at the Adare WWTP which has a design capacity for 2500 population equivalent (P.E.), while the mean loading in 2015 was 1,143 P.E, and therefore within capacity for this development. No permanent impact is anticipated on any of the Natura 2000 sites
Will the proposed development create a significant amount or type of pollution?	No. During construction, best practices and mitigation measures will be followed in order to avoid incidents of pollution.
Will the proposed development create a significant amount of	No. During the construction phase, some noise will be created however this will be temporary and short-term in

Characteristics of the Proposed Development - Screening Questions	Comment
nuisance?	duration. Construction works will be limited to certain times of the day and night to avoid nuisance to local residences.
Will there be a risk of major accidents having regard to substances or technologies used?	No. The risks of this development will be only those associated with normal construction practices. All contractors will be subject to health and safety protocols detailed in the contractor's risk assessment.
Will there be a risk of natural disasters which are relevant to the project, including those caused by climate change?	No. The development is not within the low, medium, or high AEP flood levels from the River Maigue. See Constraints map for medium AEP from Maigue River Error! Reference source not found.
Will there be a risk to human health (for example due to water contamination or air pollution)?	No. Any potential risk to human health will be as a result of the construction phase of this project. All contractors will be subject to best practice methodologies and risk assessments to minimize the risk to human health.
Would any combination of the above factors be considered likely to have significant effects on the environment?	No. This development is relatively small scale.

Conclusion: The characteristics of the proposed development are not considered to result in a significant impact on the environment by virtue of their size, nature, or operational activities.

Reasoning: The proposed housing development, including improvements to the open-space elements; and over 50% of the land surface after construction will be similar to previous conditions of grassland and road surfacing (agricultural grassland will become amenity grassland), with the other >50% of changed land use comprising of the new housing units. Construction of the space will not require significant use of natural resources, nor will it generate significant amounts of waste. Any environmental or noise impacts will be during the construction phase and not during operation of the housing development. The proposed development is relatively small in nature and not likely to have impacts on the environment after construction.

5.2 Location of the Proposed Development

The following questions have been answered below in Table 5-2. Location of the Proposed Development to determine whether the geographical location of the proposed development can be considered ecologically or environmentally sensitive.

Table 5-2. Location of the Proposed Development

Location of the Proposed Development - Screening Questions	Comment
Has the proposed development the potential to impact directly or indirectly on any site designated for conservation interest (e.g. SAC, SPA, pNHA)?	Yes. The proposed development is adjacent to the Adare Woodlands pNHA. However, there is no information provided on designated habitats or species of the pNHA, but it can be assumed that habitats and may be impacted indirectly by the proposed development e.g. bats, badgers, birds etc. The proposed site is also located within 5km buffer zone

Location of the Proposed Development - Screening Questions	Comment
	of designated Natura 2000 sites, including the Lower River Shannon SAC and Curraghchase Woods SAC and pNHA. The AA Screening report (Openfield Ecology, 2019) has been carried out for this proposed development and concludes there will be no impact on Natura 2000 sites. No impacts on the Lesser Horseshoe bat population at Curraghchase woods is likely to occur from the proposed development.
Has the proposed development the potential to impact directly or indirectly on any habitats listed as Annex I in the EU Habitats Directive?	No. As outlined by the AA Screening report, there are Natura 2000 sites within the 5km buffer zone of the proposed site which contain Annex I habitats, however, no potential impacts are expected to occur on these protected habitats due to the lack of connectivity via surface water, land & air and groundwater pathways between the proposed site and these protected habitats.
Has the proposed development the potential to impact directly or indirectly on any habitats listed as Priority Annex I in the EU Habitats Directive?	No. As indicated in the AA Screening report, there are Priority Annex I habitats present within the Natura 2000 sites located within the 5km buffer zone of the proposed development, however there will be no impact on these habitats.
Has the proposed development the potential to impact directly or indirectly on any species listed as Annex II in the EU Habitats Directive?	Yes. Lesser Horseshoe bat (<i>Rhinolophus hipposideros</i>) is an Annex II species and conservation interest of Curraghchase Woods SAC. The roosts in this SAC are approximately 5km away from the site, which is outside the zone of influence of 2km. However, Lesser Horseshoe bat roosts outside of the SAC have been identified within 1km of the site, and they are likely using the Adare Woodlands pNHA for foraging and commuting (JBA, 2019).
Has the proposed development the potential to impact directly or indirectly on the breeding places of any species protected under the Wildlife Act?	Yes. The proposed development is likely to impact indirectly on the breeding places of species protected under the Wildlife Act. Breeding birds protected under the wildlife act could be impacted directly by removal of hedgerows or trees and therefore removal should take place outside of the bird nesting season, i.e. removal between October and March. Bats may be indirectly impacted by increased lighting from the site, and directly by removal of trees from the site which may have potential roosts. On the landscape plan (Appendix B), with reference to the arborist report (Arbor-care 2019), there are some mature trees with potential roost features that will require to be removed, including T786 and T788, and T789 (See Arb Tree report). See bat report (JBA, 2019) for review of bat potential on site.
Has the proposed development the potential to impact directly or directly on the existing or approved land use?	No. The proposed development is in line with the existing/approved land use under the Adare LAP, which is zoned as Phase 1 Residential Development. This land is currently greenfield site, primarily used for grazing and silage, but a small section of the north site has recently been development into a carpark.
Has the proposed development the potential to significantly impact directly or indirectly the relative abundance, availability, quality or regenerative capacity of	No. The proposed development will not contain significant areas of impermeable surfaces. The site area will still contain some grass which will promote absorption of rainfall, groundwater regeneration, and will provide a heterogeneous landscape for biodiversity. Approximately

Location of the Proposed Development - Screening Questions	Comment
natural resources (including soil, land, water and biodiversity) in the area and its underground?	25% of the proposed development is comprised of housing unit infrastructure, including non-permeable pathways, roads and buildings; however, these areas also include permeable front and rear gardens; and thus, will not interfere or impact upon with rainfall absorption, groundwater regeneration or the local biodiversity.
Has the proposed development the potential to impact directly or indirectly on any protected structures or Recorded Monuments and Places of Archaeological Interest?	Yes. The development is proposed in a zone with a high density of Recorded Monuments and Places. There is a Lime-kiln structure situated at the north site, which was not included in the Archaeological testing report carried out for an earlier site boundary for the project. It will be fenced off to prevent damage during construction, and restored through clearance of vegetation, repointed with lime mortar around loose masonry, and made safe appropriately i.e. access from chimney secured. An interpretive sign and bench should be integrated. No other structures have been identified on site, and no structures will be impacted outside of the site boundary.
Has the proposed development the potential to impact directly or indirectly on listed or scenic views or protected landscapes as outlined in the County Development Plan?	No. There are no listed or scenic views in the vicinity of the proposed development.

Conclusions: It can be concluded that the proposed development will not have a significant impact on the environment by virtue of its location. This has been confirmed for Natura 2000 sites in the AA Screening report (Openfield Ecology 2019) provided for this development. The Lime Kiln on site will be restored as part of the proposed development and the surrounding area enhanced to improve its setting.

Reasoning: The AA Screening report highlights the lack of connectivity from the proposed development, via surface water, land & air and groundwater to the Natura 2000 sites within the 5km buffer zone, it is predicted that there will be no significant impacts on any of Natura 2000 sites, or Annex I habitats or Annex II species. When considered with other plans and projects, this project will not significantly affect any designated European Sites. While the proposed site is located within close vicinity to the Adare Woodland pNHA, the scale and nature of the works make it unlikely that there would be any significant impact upon the overall condition of the pNHA. However, there may be impacts on Lesser Horseshoe Bat, an Annex II species, from increased light pollution which they are particularly sensitive to. The lighting design should be designed to be sensitive to nocturnal animals and will be directed away from dark areas. The Lime-kiln on the site, will be protected during construction, and restored as part of this development.

5.3 Characteristics of Potential Impacts

The following questions were answered in Table 5-4, in line with Guidance on EIA Screening - June 2001, prepared for the European Commission by ERM (UK), to determine whether the environmental impacts of the development can be considered significant.

Table 5-3. Overview of Impacts According to Theme (as in an EIAR)

EIA Section	Brief Assessment of Impacts
Human Beings	<p>Local people will experience temporary impacts during the construction of the development, which may result in temporary road closure, which may cause traffic congestion elsewhere in the locality. Normal construction noise may impact on residences in close proximity to the development site.</p> <p>There will be a benefit to human beings as this site provides affordable and social housing for residents of Adare, as well as amenities such as a pedestrian walk and cycle lane, and</p>
Flora & Fauna	<p>The proposed development will require the removal of hedgerows and trees, which is likely important features for bats and birds. Impacts to fauna will be limited to minor physical disturbance from the works in terms of noise, vibrations and lighting (should works be carried out during low light levels). However, none of the designated Natura 2000 sites and their respective protected habitats or species will be impacted upon due to the lack of connectivity through all pathways with the proposed site. The drainage design has been designed to avoid the mature trees on site, taking into account a root protection area around these trees.</p>
Soils & Geology	<p>The construction works will require excavation for the laying of foundations and creation of stormwater and foul water drainage systems, attenuation tank and construction of roads and carparking, including the reconfiguration of the existing car park at the north site. Risks to the soil and geology environment will be temporary, lasting only the duration of the construction phase.</p>
Water	<p>Construction activities could have an impact on water quality through the creation of oil spillages, concrete, dust and emissions. However, no waterbodies are on or adjacent to the site, with the nearest waterbody located 500m away.</p>
Air & Climate	<p>Air quality impacts will be of limited duration and will occur only during the construction phase of the project. These impacts will be through the generation of dust during excavation and construction works.</p>
Noise & Vibration	<p>Noise and vibration impacts will be of limited duration and will occur only during the construction phase of the project. These impacts will be from grading works, construction of foundations and the buildings themselves, as well as excavations and relaying of tarmac for the road and cycle path.</p>
Landscape and visual	<p>The proposed development will not intrude or obscure any scenic views for surrounding sensitive receivers. A landscaping plan has been developed for the site which will ensure that the landscape and visual impact of the proposed development is positive.</p>
Material Assets	<p>The construction programme for a project of this nature can be estimated at approximately 18 months (projected commencement July 2020). It is likely that soil and rock will be excavated from site during construction. Road closures or resident-only access will be required which will involve closing alternating lanes of traffic during construction. Traffic will be temporarily affected during this time and</p>

EIA Section	Brief Assessment of Impacts
	during deliveries to and from site by construction machinery.
Cultural Heritage	The proposed development will not negatively impact on any archaeologically significant features. The Lime Kiln in the northern part of the site will be protected and restored as part of the project. The mature trees, particularly the ancient Oak trees, which were part of the Deerpark woodland estate will be retained.
Interaction of Foregoing	There will be no significant interactions of the foregoing causing significant environmental impacts.

The following questions were answered in Table 5-4, in line with Guidance on EIA Screening - June 2001, prepared for the European Commission by ERM (UK), to determine whether the environmental impacts of the development can be considered significant.

Table 5-4. Characteristics of Potential Impacts

Characteristics of Potential Impacts - Screening Questions	Comment
Will there be a large change in environmental conditions?	No. Only small pockets will be affected. The north and south sites are on the periphery of the site, and NW of site isn't being changed. The development is small in nature and keeping in line with the character of the surrounding community. The minor change in environmental conditions will occur only in the construction phase of the project, with the loss of some trees and hedgerow. The operational phase of the development will be an amenity grassland environment to re-establish however there will be a small increase in light pollution.
Will new features be out-of-scale with the existing environment?	No. The proposed development is set to the same scale as the existing buildings and thus will not look out of place in the local environment.
Will the effect be particularly complex?	No. The effects during construction will be predictable and alleviation measures can be appropriately applied to minimize the effects to the environment. No impacts have been identified during the operational phase of the project.
Will the effect extend over a large area?	No. Given the small scale and nature of the proposed development this is highly unlikely.
Will there be any potential for trans-frontier impacts?	No.
Will many people be affected?	No. The proposed development site is located at the western edge of the village of Adare. Daily traffic will be impacted slightly for existing residences during the 18-month construction period. However, the proposed Adare bypass will eventually alleviate the long term congestion in Adare, proposed to open 2024.
Will many receptors of other types (fauna and flora, businesses, facilities) be affected?	No. There will only be localised impacts on flora and fauna due to disturbance and habitat loss though vegetation removal. Any impacts will be temporary (limited to construction phase) and flora and fauna will have a chance to re-establish in the area after construction. The landscape plan has proposed a native planting scheme to

Characteristics of Potential Impacts - Screening Questions	Comment
	accommodate for the loss of vegetation. No businesses or facilities will be significantly impacted.
Will valuable or scarce features or resources be affected?	No. There will be no effect on scarce features or resources.
Is there a risk that environmental standards will be breached?	Yes. During the construction phase there is a residual risk of environmental standards being breached, however Contractors will follow Pollution Prevention Measures and will prepare a Risk Assessment and will be required to follow best practices in their contractual obligations.
Is there a risk that protected sites, areas, features will be affected?	The lime kiln at the north side is not a protected feature. It is however marked on the 1st edition maps, and is therefore part of the architectural heritage of the town and a valuable heritage feature. The lime kiln will be protected and rehabilitated during this development. No other nearby protected sites, areas or features will be affected.
Is there a high probability of the effect occurring?	Whilst temporary impacts from construction could occur, these impacts will be largely alleviated through the use of construction best practices and will be undertaken by experienced and licensed contractors.
Will the effect continue for a long time?	No. Though no significant environmental effects have been identified, any secondary effects will be temporary and limited to the construction window. Construction will occur outside the nesting season and will not affect nesting or migratory birds.
Will the effect be permanent rather than temporary?	The potential effects during construction are considered temporary. No significant permanent effects of the development have been identified as a result of the operational phase.
Will the impact be continuous rather than intermittent?	The impact during construction from traffic movement will be intermittent.
If it is intermittent will it be frequent rather than rare?	The intermittent impact during construction from traffic movement will be frequent.
Will the impacts be irreversible?	The impact during construction from traffic movement will be intermittent.
Will it be difficult to avoid, or reduce or repair or compensate for the effect?	No. As the impacts will be limited to the time of construction, they can be avoided and reduced using good construction practices.

Conclusions: It is concluded that the type and characteristics of impacts for this development are not considered significant. There are no potential impacts on designated biodiversity sites, as confirmed in the AA Screening Report. The potential impacts on designated biodiversity sites and natural resources are considered to be temporary, i.e. during the construction phase. No permanent or on-going impacts will occur.

Reasoning: The predicted impacts during the construction phase will be temporary, lasting only the duration of the construction phase (approximately 18 months). These include risks to surface and groundwater, air quality, noise and vibration, and human beings. All of these risks during the construction phase can be managed by employing suitably experienced and licensed contractors, and through appropriate mitigation and best practices.

The impacts are predictable, temporary, and are not considered complex. The proposed development is not predicted to adversely impact the pNHA adjacent to the site, or with the Natura 2000 sites due to lack of connectivity. Physical disturbance may impact bird nesting populations which nest in the locality of the proposed development, and on roosting bats. However, the amount of vegetation and trees to be removed is negligible and should not have significant impacts on birds and bats. Mitigation has been recommended to ensure the welfare of bats and breeding birds present on-site, and as such no significant impacts are anticipated.

There have been no identified impacts during the operational phase of the project.

6 Conclusions and Recommendations

Conclusions: Under the Planning and Development Act 2000 as amended, and the Planning and Development Regulations 2001 as amended, the development project does not require the preparation of an EIAR under Part 1 or Part 2.

An EIAR Screening exercise was carried out to determine the potential for significant environmental impacts for projects not listed under Part 1 or Part 2 of the Planning and Development Regulations 2001 as amended, under the area of Sub-threshold development. This screening exercise examined the project in terms of its size, nature, operational activities, location, and the significance of any impacts identified. The EIAR screening made reference to the Engineering, Architectural and Landscape design drawings, the Archaeological and Traffic Reports, AA Screening, Bat Survey and Tree Survey, which will accompany the planning application.

The characteristics of the development are not likely to have significant effects on the environment outside of the construction phase of the project. The greatest impacts during construction will be the physical disturbance, including noise from the installation of the housing units and supporting infrastructure.

The location of the proposed development is situated within close proximity to the Adare Woodlands pNHA, though no adverse impacts are predicted for the pNHA. It is also predicted that there will be no significant impacts on the designated European Natura 2000 sites, which is confirmed in the accompanying AA Screening Report (Openfield Ecology, 2019). It is possible, however, that construction activities could impact on local protected bird species foraging and nesting in the area, however, the planned timing of works will allow for the avoidance of impacts on the local birds during the nesting/breeding. It has been deemed that no NIAH / RMP sites of cultural heritage importance will be impacted upon by the proposed development and associated construction works.

Based on the results of the above screening exercise, an EIAR is not required or recommended for this project.

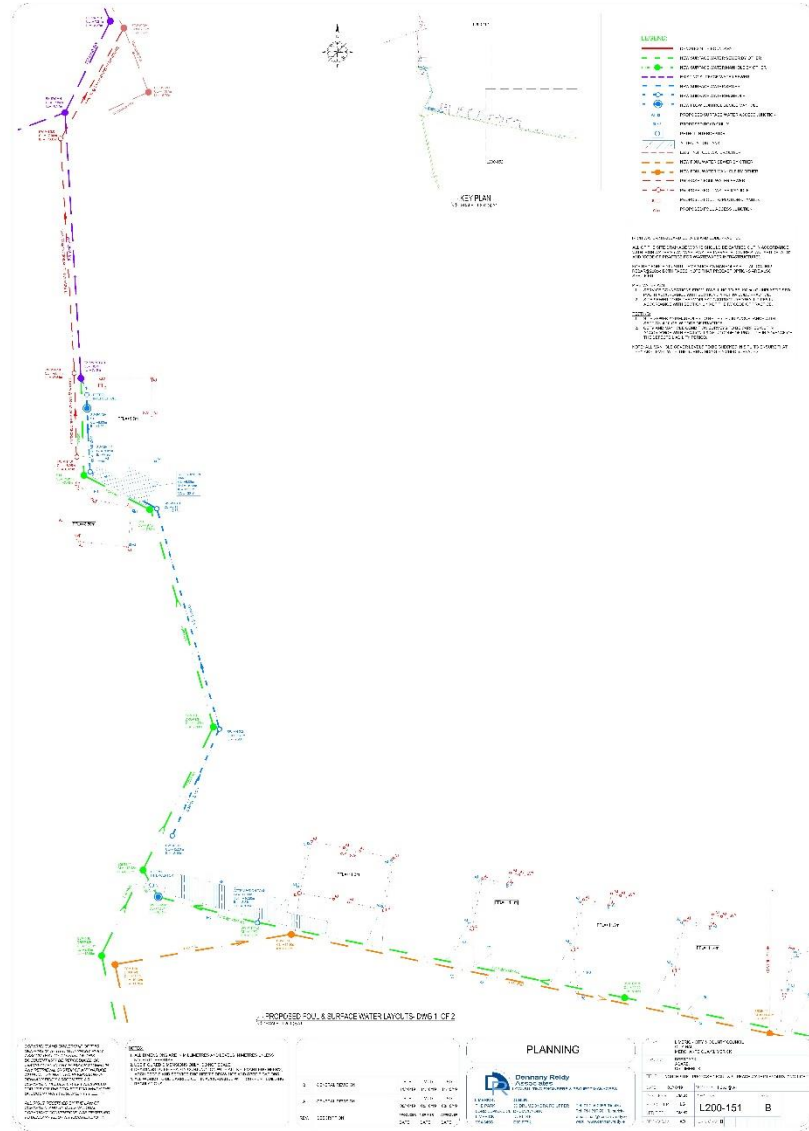
The overall conclusion is based on the details of the scheme provided by Limerick City & County Council. If the extent of the scheme or the construction methods for the scheme are changed then the EIAR Screening assessment should be reviewed.

Recommendations: the following measures are recommended:

- The Archaeological Report (Cronin 2017) carried out for the northern part of the site should be extended to the area of the Lime Kiln so that any unrecorded archaeological features may be considered prior to the detailed design stage; and
- The lighting design should include measures to mitigate impacts on the bat population of the site.

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