

**Report for the Purposes of
'Environmental Impact Assessment Screening'**

Prepared for Limerick City and County Council

**Extension to Innovate Limerick 'Digital Collaboration Centre',
Upper Cecil Street, Limerick City**

June 2020



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1.0 INTRODUCTION

This report has been prepared by HRA PLANNING Chartered Town Planning Consultants for, and on behalf of 'Innovate Limerick, Engine, Upper Cecil Street, Limerick' in relation to a proposed development (described by that body as a 'Digital Collaboration Centre'), the nature and extent of which is described in Section 3.0 of this report.

This report presents an assessment of the proposed development and, a determination as to the likelihood of significant effects on the environment, and the requirement or otherwise, for Environmental Impact Assessment (EIA).

The authors of this report hold professional recognised qualifications in; Town Planning; Environmental Impact Assessment Management; and, Applied Science (Ecological Assessment) sufficient to undertake this assessment.

2.0 LEGISLATIVE BASIS AND METHODOLOGY

This *Screening* Report has been prepared to inform the determination by Limerick City & County Council, pursuant to the legislative provisions set out in Article 120 of the Planning & Development Regulations 2001 (as amended), as to the real likelihood (or otherwise) of significant effects on the environment, and the requirement (or otherwise) for *Environmental Impact Assessment* (EIA).

Screening is the first stage in the EIA process, whereby a decision is made on whether or not EIA is required. The key consideration in determining the requirement, or otherwise for EIA is, the likelihood of significant environmental effects caused by the project. Significant effects may arise by virtue of the scale or extent of the proposed development in relation to the environmental sensitivity of its location and/or the characteristics of such impacts.

In the first instance, the EIA Screening process determines whether there is a 'mandatory' requirement for EIA. Where it is determined that there is no 'mandatory' requirement for EIA, the EIA Screening process advances to consider whether there is a non-mandatory, 'sub-threshold' requirement for EIA.

The methodology utilised to screen the proposed development was undertaken within the context of, and consistent with the following statutory provisions and best practice guidance;

- Planning & Development Act 2000 (as amended);
- Planning & Development Regulations 2001 (as amended);
- Guidance on EIA, Screening, European Commission, 2001;
- EIA, Guidance for Consent Authorities regarding Sub-threshold Development (DoEHLG, 2003);
- Guidelines on the Information to be Contained in Environmental Impact Statements (Environmental Protection Agency, Draft August 2017);
- Advice Notes on Current Practice in the Preparation of EIS (EPA, 2003);
- Draft Advice Notes for Preparing Environmental Impact Statements, (EPA 2015);
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, 2009.

This approach is consistent with the procedural steps contained in The European Commission Guidelines on EIA Screening (June 2001) (Figure 1). All supplementary reports and assessments referenced in this assessment are enclosed with the planning application.

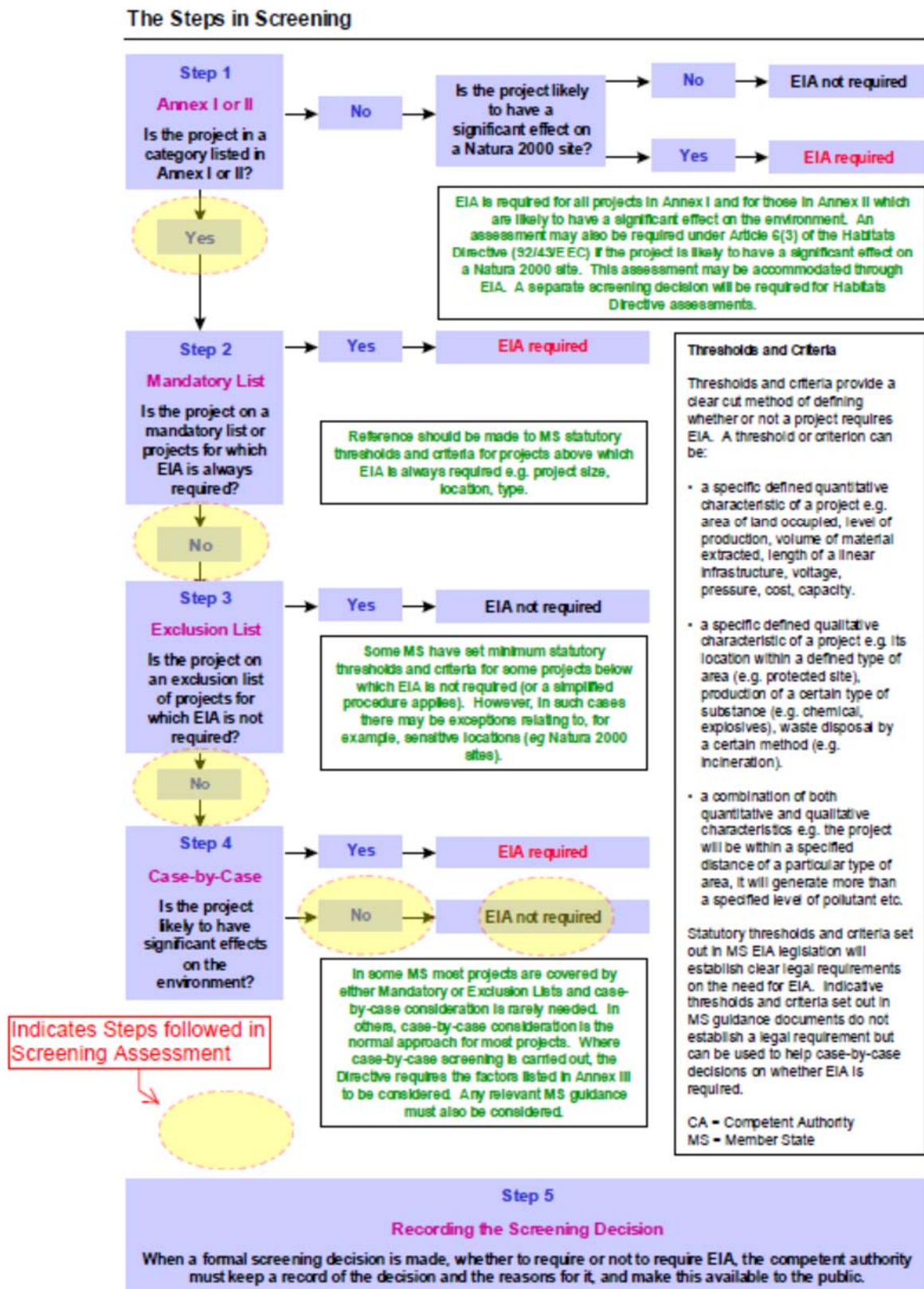


Figure 1.0 The Steps in Screening
 Source: Guidance on EIA Screening. European Communities (2001)

3.0 DESCRIPTION OF THE PROPOSED DEVELOPMENT/ PROJECT

3.1 Description of the Location

The project site, measuring 0.15 hectares in area, is situated at the intersection of Cecil Street and Dominic Street, Limerick City within the commercial city-centre area of Limerick City. The project site contains an existing three/four storey building (titled 'Engine') which currently extends across approximately half of the property. The existing building extends across its entire northern elevation on Cecil Street for circa 36m and then wraps around the corner onto its eastern elevation, extending along Dominic Street for circa 20m. The property continues along Dominic Street beyond the end of the existing building for a further 25m (approximately) and terminates at the intersection of Dominic Street, and Griffin Row which extends along the rear of the entire property. The remainder of the property, along Dominic Street, is set behind a boundary wall and railing, the design of which, matches the material finish of the existing building. The internal area, behind the boundary wall, comprises a private parking area associated with the existing building with vehicular access from Griffin Row.

The property is located within Limerick's Georgian Quarter- known as Newtown Pery, built in the late 18th and early 19th century, to a grid plan of equal rectangular blocks and of a distinctive architectural unity which still defines city morphology. The existing building on the property ('Engine') constitutes a notable contemporary design intervention to Cecil Street which otherwise comprises buildings and streetscape predominantly of Georgian two and three storey. In comparison, the character of both the architecture quality and the streetscape is somewhat more diverse and sporadic on Dominic Street. The entirety of the subject site has been developed and consists of the buildings and artificial (developed) surfaces.

Existing Uses

The building operates under the title 'Engine' and, is the home to 'Innovate Limerick' which provides a number of entrepreneurial support services and spaces, for employment, training and skills solutions across all sectors, with a particular focus on regeneration areas.

Zoning, landuse Objectives

The subject site benefits from a number of landuse zoning objectives' described as '1 (A,B,C) City Centre Area' as illustrated on 'Map 1: Landuse Zoning Map' contained within the Limerick City Development Plan 2010-2016. These objectives are defined in Chapter Section 15 of that Plan under 'Zoning Objective 1' as follows:

Objective ZO.1 City Centre Area (CCA)

To support the retention and expansion of a wide range of commercial, cultural, leisure and residential uses in the City Centre as defined in the 2030 Economic and Spatial Plan.

Objective ZO.1 (A) City Centre Retail Area (CCRA)

To provide for the protection, upgrading and expansion of higher order retailing, in particular comparison retailing, and a range of other supporting uses in the City Centre retail area.

The City Council is committed to the reinforcement of the City Centre role in the retail hierarchy by facilitating the development of a significant quantum of floor-space to meet projected demand. Retailing is prioritised in this area but not to the exclusion of other land use types. Other uses such as residential, hotel, office and cultural and leisure facilities etc which compliment the retail function of the CCRA and promote vibrancy in the City Centre are also permitted, subject to the policies to promote City Centre retailing.

Objective ZO.1 (B) City Centre Commercial Area (CCCA)

To support the retention and expansion of a wide range of commercial, cultural, leisure and residential uses in the commercial core area, (apart from comparison retail uses).

The Commercial Area reflects the commercial and employment zone of the City Centre extending from the City Centre Retail Area. All uses are permitted throughout the CCCA, except comparison retail uses, which are restricted to the City Centre Retail Area unless they serve a local need only.

Objective ZO.1(C) Inner City Residential Neighbourhoods

To reinforce the residential character of inner City residential neighbourhoods, while supporting the provision and retention of local services, and civic and institutional functions.

The areas outside of the commercial core but within the City Centre boundary fall within this zoning type. These areas include a large quantity of older housing stock, some low end commercial uses and a range of other non-residential types such as large health and education institutions and community facilities, which strongly contribute to the character of these areas. The City Council is committed to protecting the established residential housing stock in these areas by restricting the development of incongruous development types and providing the range of local service provision required to ensure their attractiveness and vibrancy. Civic and institutional functions will also be facilitated where appropriate and new residential development to compliment the established areas will be supported.

The project site is not subject to any defined flood risk or such areas defined as such on 'Map 2: Flood Risk Areas' as contained within the Limerick City Development Plan 2010-2016.

Amenity Designations

No natural amenity, or built heritage objectives (including Architectural Conservation Areas) apply to the subject site. Whilst the subject site is situated within the 'Newtown Pery' Georgian neighbourhood, the subject site lies outside the defined Architectural Conservation Area 'ACA 1A South City Centre & Newtown Pery' defined by 'Map 8: ACA's Limerick City' contained within the Limerick City Development Plan 2010-2016. Designated Natura amenity areas are illustrated in Figure 1.

3.2 Characteristics of the Proposed Development

3.2.1 Nature of Development

The nature and extent of the proposed development is described in the public notices as :

- *Extension to existing Engine Building to consist of the provision of 1254m² of digital collaboration space facing onto Dominick Street*
- *Comprising of collaboration space on ground and first floor, office accommodation on second floor and meeting/conference suite on third floor.*
- *Plant room and garden area at roof level of existing building on Cecil Street.*
- *Hard and soft landscaping to rear courtyard*
- *Connection to existing site services.*
- *All associated site works.*

The general layout arrangement of the proposed development is illustrated on drawings prepared by Drake Hourigan architects and enclosed with the planning application. The intended use is to provide and facilitate an increase of the existing floor space for the purpose for similar (primarily office/training based) landuse activities. The area in which the proposed extension will be placed, is used for private space incidental to the existing use of the property. The proposed development situated within the confines of the existing property does not therefore give rise to any change of use.

3.2.2 Design & Layout

The proposed development will involve an extension to the existing structure along the entirety of the north-eastern elevation of the site, along Dominic Street and for a section of circa 16m, along the rear of the property, on Griffin Row. The proposed extension will match the 3-storey height of the existing structure with architectural style and finished materials intended to match those of the existing building. Windows are to be provided on all floors of the proposed extension. Car parking will still be provided to, and within the rear of the property accessed from Griffin Row unchanged from existing arrangements. There will likely be a minor increase in wastewater loading, though a negligible increase in surface water loading given that the entire site is in hard standing / buildings at present.

3.2.2 Infrastructure

Foul Water Infrastructure: The site and existing building is currently serviced by an existing combined sewer network situated within Cecil Street and Dominic Street. Both foul and surface water discharge from the existing site into that network. The surface water from both the building and the impermeable hard surface to the rear of the building, is discharged into that combined network at an uncontrolled rate and, unattenuated. These combined wastewaters discharge to the existing Bunlickey municipal waste-water treatment plant serving the city which is operated by Irish Water under existing EPA licence.

The propose development will include alterations to the existing combined sewer and, the introduction of surface water management in the form of attenuation. The sewer network will be diverted within

the site, to allow for the new building footprint. The general discharge of foul water to the existing foul network and treatment plant will remain unchanged. Details of this are illustrated on engineering drawing (Dennany Reidy Associates Consulting Engineers) ref: 200040-120.

Surface Water: The design engineer's report confirms the inclusion of a below-ground, 28m³ surface water storage tank and class 1 petrol interceptor. This has been calculated to reduce the peak flow of surface water run-off rate, from the current un-attenuated level of 70 litres per second (l/s) to 7.5 l/s within the (undeveloped area to the) rear of the property. The method of proposed attenuation will result in a predicted 89% reduction in peak discharge rate in the event of a predicted '1 in 100 year' storm event.

Water Supply: The existing building is serviced by an existing 150mm diameter watermain connection on Dominic Street. No additional connection is required.

Building Floor level: The proposed finished floor level at 14.0mOD is significantly higher than the predicted flood level, taking account the worst case flood risk scenario of 5.16mOD calculated in relation to the '1 in 1000 year' flood event.

3.2.3 Frequency/Duration of the Project

Construction works would be temporal in nature. The operation phase of the development and its intended commercial office landuse activity and associated services would be permanent.

3.2.4 Construction Timeframe

The construction programme is anticipated to commence upon planning consent.

3.2.5 Preliminary Construction & Environmental Management Plan

Consistent with best practice, it is anticipated that a Construction & Environmental Management Plan (CEMP) will be prepared by the Site Contractor upon appointment and following planning consent. The CEMP will document and describe the main activities that will be undertaken to facilitate the project and to provide a framework of any further best practice environmental protection measures for implementation prior to commencement of, and throughout the duration of, the proposed construction works. The Contractor's Method Statement will detail the overall management structure as well as the roles and responsibilities of the key team members with responsibility for environmental management of construction of the proposed development consistent with best practice.

4.0 OTHER RELEVANT INFORMATION / STUDIES

4.1 'Appropriate Assessment' (AA) Screening Assessment Report

This application is accompanied by a 'Screening Report'¹ prepared by OPENFIELD Ecological Services for Limerick City and County Council. That 'Screening Report' was undertaken to examine

¹ 'Screening Report for Appropriate Assessment Screening Report for Appropriate Assessment for proposed development at Dominick Street and Cecil Street, Limerick, Limerick City (May 2020).

the potential effects of this project on the Natura 2000 network, the nature of such effects, and whether any such effects are likely to be significant in light of the conservation objectives of specific Natura 2000 designated sites occurring in the zone of influence (either alone or in combination with other plans and projects).

The methodology of that assessment follows that set out in guidance documents; 'Assessment of plans and projects significantly affecting Natura 2000 sites 'Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC' (Oxford Brookes University, 2001); and, Guidance from the Department of the Environment, Heritage and Local Government 'Appropriate Assessment of Plans and Projects in Ireland' (2009).

The assessment confirms that the project site is not located within or directly adjacent to any Natura 2000 area and that the site is of negligible biodiversity value. The AA Screening Statement has established that the Bunlickey municipal wastewater treatment has a p.e. (population capacity) of 130,000 and the current hydraulic loading of that plant is less than that. The annual Environmental Report of 2018 confirmed no exceedance of licence limits of the plant and reports that the plant is unlikely to exceed capacity within the next three years.

The AA Screening report confirms only the possibility for the potential for indirect effects to the Natura 2000 network given that no (direct effect) habitat loss would occur as a result of the proposed development. Whilst there is a hydrological pathway between the subject site and the Natura 2000 network (The Lower Shannon SAC site code 002165 confirmed as the only relevant site under consideration) by virtue of discharge of treated foul and storm water entering the River Shannon via the Bunlickey waste water treatment plant, the (AA) Screening report takes into account, the sufficient design capacity in that system for increased lodging generated by the propose development, and, the evidence available which confirms that negative effects to water quality (of the River Shannon) are not arising from discharge from the Bunlickey plant. On that basis, the AA Screening Assessment confirms, that the potential for significant effects, arising from combination with other projects was unlikely to arise.

Consequently, stage 2 'Appropriate Assessment' was dismissed given that the project was not within or directly adjacent to any Natura 2000 area, and given that potential for significant indirect effects, arising from the project alone, or in combination with other projects, was ruled out.

4.2 Flood Risk Assessment

Having regard to the design information² and consideration of building floor levels referenced in section 3.2.2 (Infrastructure') the proposed development is not considered at risk to flooding, and thus, no further assessment is considered necessary.

² DRA Consulting Engineers, Planning Report (21/05/20)

5.0 DESCRIPTION OF ASPECTS OF THE ENVIRONMENT LIKELY TO BE SIGNIFICANTLY AFFECTED

The intended operational nature of the proposed development is consistent with the general landuse objectives for the subject site, and the corresponding development objectives for the city centre area. Thus, a potential for significant effects on the environment is only likely to arise as either a direct or indirect consequence to use of services and infrastructure, design details, and/or construction measures. These are considered further in the EIA Screening assessment.

6.0 EIA SCREENING ASSESSMENT

6.1 Assessment of Mandatory Requirement for EIA

The prescribed classes of development for the purpose of *mandatory* EIA are set out in Schedule 5 of the Planning & Development Regulations 2001 (as amended). The following table assesses the proposed development in the context of the mandatory EIA provisions that are relevant to this project.

Legislative Reference	Mandatory EIA Threshold	Screening Assessment
Planning and Development Regulations 2001 (as amended), Schedule 5, Part 2: Class 10(b)(iv) ‘Infrastructure projects’	<i>“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”</i>	The site area of the proposed development measuring 0.15 hectares in area is significantly below the 10 hectare threshold for urban development in the case of other parts of a built-up area.

Table 6.1 Screening Matrix for Mandatory EIA

The proposed development does not match any of the projects, or exceed any of the thresholds (including ‘changes’ or ‘extensions’ to development) set out in Schedule 5 of the Planning & Development Regulations 2001 (as amended) that would trigger a *mandatory* requirement to undertake EIA. The project is under the threshold for Mandatory EIA.

6.2 Assessment of 'sub-threshold' Requirement for EIA

Following the assessment of, and determination that 'mandatory' EIA is not required, the assessment of a *sub-threshold* requirement for EIA is undertaken. The criteria for determining the requirement *sub-threshold* EIA, is detailed in Schedule 7 of the Planning & Development Regulations 2001 (as amended)³ under the following headings;

- Characteristics of the Proposed Development
- Location of Proposed Development
- Types and Characteristics of Potential Impacts

In the application of this criteria, reference is made to the DoEHLG Guidance Document (Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding Sub-threshold Development') which states that:

'those responsible for making the decision must exercise their best professional judgement, taking account of considerations such as the nature and size of the proposed development, the environmental sensitivity of the area and the nature of the potential effects of the development. In general, it is not intended that special studies or technological evaluations will be necessary for the purposes of making a decision'.

These legislative criteria and guidance recommendations have been applied in the consideration of the proposed development. Each of these criteria are assessed under the following headings.

6.2.1 Characteristics of the Proposed Development

The characteristics of the proposed development, and, its potential to impact on the environment, on its own, or in combination with other potential developments in the region, are considered in the following table.

Screening Criteria	Construction Impacts	Operational Impacts
Size and design of the proposed development	The construction works are likely to be confined generally within the footprint of the existing site area. Any use or obstruction to adjacent road or footpath spaces, will be carried out in accordance with best environmental and safety practices which can be detailed in a construction and environmental management plan (CEMP). Details of road closures (where necessary can and will be undertaken in accordance with approval with the local authority).	The scale, form and design are consistent with the scale and design of the existing on site 'Engine' building. The building will give rise to increased development on site, and new developed streetscape of three storey in height on Dominic Street. The introduction of development on Dominic Street to three storey in height, is consistent and commensurate with the scale and pattern of development on adjacent plots. The size of the commercial activity, which the proposed development can deliver, is consistent with the spatial and landuse objectives for this property as set out in the Limerick City

³ Derived from transposition of the Council Directive 97/11/EC ('of 3 March 1997 amending Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment') which introduced guidance for Member States in terms of deciding whether or not a development is likely to have significant effects on the environment

	<p>Plant and machinery will be temporal in nature and removed at the end of the construction programme.</p> <p>With standard and appropriate best practice measures in place, no significant negative effects are likely.</p>	<p>Development Plan, and is compatible with adjacent uses.</p> <p>Significant effects on the environment consequent to the size and design of the proposed development are thus, considered unlikely.</p>
Cumulation with other existing / proposed developments	<p>There is an absence of any current or proposed development projects occurring within reasonable vicinity of the subject site.</p> <p>Consequently, the construction phase of the proposed development, in cumulation with existing or proposed development, is unlikely to result in significant adverse effects to the environment.</p>	<p>The operational phase of the proposed development, when considered cumulatively with existing and permitted development, and with proposed spatial and economic plans, is unlikely to result in significant adverse effects to the environment. In this regard, due consideration has been given to the spatial development objectives for the area set out in the Limerick City Development Plan, and the; 'Limerick Twenty Thirty' spatial and economic plan - in which, a number of strategic sites have been, and are, identified in and around Limerick City Centre, that will act as key drivers of economic growth for the city, county and region.</p>
Use of natural resources	<p>The existing site avails of an existing level of services and infrastructure.</p> <p>The construction process will include use of various raw materials. No out of the ordinary use of natural resources are considered likely or anticipated during the construction process. The subject site does not contain any undeveloped natural resources and thus, no effects will arise by way of loss or reduction of natural habitat. The Contractor's CEMP will set reuse and recycling objectives for specific materials and will establish design targets to reduce or negate unnecessary use of natural resources.</p> <p>No significant negative effects are thus considered likely.</p>	<p>As per the construction phase, the subject site is currently developed and thus the operational phase does and will not involve, or require, the loss of natural onsite resources. The nature of the operational use, including infrastructure demand (in the form of water, foul water or surface water demand) does not, nor is anticipated to require natural resources uncharacteristic to the nature and function of the internal (office based) activity.</p> <p>No significant negative effects are thus considered likely.</p>
Production of Waste	<p>The project does not involve any significant element of demolition and therefore it is unlikely that significant construction wastes will not be generated. Construction waste will be typical of a development of this nature. This is likely to include; modifications to the southern elevation of the existing building to facilitate structural tie-in for the proposed extension, and removal of existing ground cover within the rear (undeveloped) portion of the site to facilitate ground works and make ready foundations and services. The Contractor's CEMP will include a Waste Management Plan in full accordance with statutory legislation and associated guidance.</p>	<p>The generation of waste will be commensurate with normal office use and is not expected to give rise to significant adverse levels of waste production.</p> <p>The collection and management of internal generated waste will be the responsibility of the internal operator and is expected to be serviced and disposed of, by licenced waste management operator.</p> <p>Foul drainage waste will discharge to the existing foul network via the proposed modified connection to the existing foul sewer and discharged as per existing arrangements, to the municipal wastewater treatment plan. There is sufficient capacity in that infrastructure to accommodate the additional foul water loading.</p>

<p>Pollution and Nuisances</p>	<p>The CEMP will specify best practice limitations to address the potential for operational nuisance related to noise, dust, sediment disposal and vibration impacts which shall adhere to industry standards and EPA requirements. This will include management of surface water during the construction phase and prevention of uncontrolled off-site surface water discharges to adjacent properties. All pollution and nuisance elements should be subject to ongoing review and monitoring.</p> <p>The proposed development will be subject to normal conditions related to construction working hours to protect the amenities and operations of adjacent properties.</p> <p>No significant negative effects are likely.</p>	<p>The proposed development will give rise to further anthropogenic activity on the site by virtue of increased commercial office floor space.</p> <p>However, the proposed development is appropriately located and is supported within the defined commercial city centre.</p> <p>Surface water management proposals for the development are designed in accordance with best practice insofar as they can be, taken into account, the specific circumstances of this site. This includes the introduction of attenuation of surface water on site which does not currently exist, and discharge of same to the existing network at a controlled rate. This will result in a significant improvement of surface water run-off (by +89%) thus resulting in a positive effect to the capacity of, and demand on, existing utility infrastructure.</p>
<p>Risk of Major Accidents</p>	<p>Risk of major accident is not foreseen subject to the construction programme being carried out consistent with industry approved standards and guidance.</p>	<p>Risk of major accident is not foreseen where the operational use is carried out within building and infrastructure design specifications provided.</p>
<p>Risks to Human Health</p>	<p>Construction related noise and dust omission, and presence of construction traffic and plant can be undesirable to the local neighbourhood and commercial operations. However, such effects can be managed effectively in the CEMP to within appropriate limitations and acceptable thresholds. Such arrangements will be temporal, reflective of the relative short construction timescale. Consequently, and subject to compliance with the CEMP, no significant effects to Human Health are considered likely.</p>	<p>Building design will adhere to best practice safety regulations. Thus, the design and, the intended commercial operations, are unlikely to give rise to no significant risk or effect to human health.</p>

Table 6.2 Characteristics of the Proposed Development Matrix

6.2.2 Location of Proposed Development

The following assessment gives consideration to the environmental sensitivity of the geographical area which might be affected by the proposed development having regard to the following:

Screening Criteria	Assessment
<p>Existing and Approved Landuse</p>	<p>The spatial and economic landuse zoning objectives for the site and for the city-centre area, as set out in the limerick City Development Plan 2010-2016 support the development of the site for commercial (city-centre) type landuse activities. That Plan has already been subject to the SEA process. There are no inherent sensitives arising from existing or approved landuse when taking account of those spatial development objectives, and the approved landuses that would likely give rise to potential for significant effects on the environment as a consequence to the proposed development.</p>

Abundance, Quality and Regenerative Capacity of Natural Resources	The subject site is wholly developed and under urban landuse as categorised under the Corine landuse biophysical classification ⁴ : 'Artificial Surfaces' and 'Continuous urban fabric' (Code 111). The subject site and location do not present an inherent environmental sensitivity in relation to the relative abundance, availability, quality and regenerative capacity natural resources that is likely to give rise to potential for significant effects on the environment as a consequence to the proposed development.
Wetlands riparian areas, and river mouths	The subject site is not directly linked to, or reliant upon wetlands, riparian areas or river mouths which might give rise to the potential for significant adverse effects on the environment. The sensitivity of the River Shannon environment and its associated natural amenity designations are considered in further detail in this table under the heading: 'Nationally Designated Sites' and 'European Sites'. Assessment of the potential for significant <i>indirect</i> effects to same are examined and discussed in detail in Section 6.2.3 'Characteristics of Potential Impacts'.
Coastal Zones	The subject site is not located in proximity or connected to a coastal zone and thus the potential for significant effects can be dismissed.
Mountain and Forest Areas	There are no mountain ranges or forest areas in, adjoining or in proximity to the subject site and thus the potential for significant effects on such areas can be dismissed.
Nature Reserves and Parks	No Nature Reserves or Parks will be affected by the proposed development.
Nationally Designated Sites	<p>The subject site does not contain any part, nor is it; directly linked to, or reliant upon areas of Nationally designated sites. The presence of the Inner Shannon Estuary - South Shore 000435 proposed Natural Heritage Area (pNHA) is acknowledged along a section of the River Shannon.</p> <p>Whilst that pNHA is identified for wildlife and habitat value, the potential for effects on same have been sufficiently examined and assessed under the heading 'European Sites' given the overlapping extent and purpose of these designated areas. The potential for significant indirect effects on the pNHA is assessed further in Section 6.2.3 in the context of waste water discharge from the site to the municipal waste water treatment system in Bunlickey, where thereafter, treated waters discharge to the River Shannon.</p>
European Sites	<p>The subject site does not contain any habitat features nor does it support species which are afforded protection under European designation (i.e. Special Area of Conservation [SAC] or Special Protection Area (SPA) pursuant to the EU Habitats Directive). The potential for significant direct effects on European designated sites can thus be ruled out.</p> <p>As per consideration of 'Nationally Designated Sites', the potential for significant indirect effects on the Natura 2000 network is assessed further in Section 6.2.3 in the context of waste water discharge from the site to the municipal waste water treatment system in Bunlickey, where thereafter, treated waters discharge to the River Shannon.</p>
Environmental Quality Standards	It is not considered that any significant environmental issue arises as a consequence of any specific environmental quality standard, not examined in this assessment. Despite that, the proposed development is considered unlikely to result in exceedance of Environmental Quality Standards. The potential for impacts on Environmental Quality Standards will be minimised through implementation of appropriate best practice measures and adherence to the CEMP.
Densely Populated Areas	Whilst the proposed development is situated within the densely populated urban and city-centre area, it is not considered that this presents any significant uniqueness of environmental sensitivity relative to the proposed development. The nature of the proposed development is from a landuse and spatial perspective, an anticipated and

⁴ The Corine Land Cover (CLC) provides a pan-European inventory of biophysical land cover, using 44 classes and a minimum mapping unit of 25 ha at 1:1000,000 scale and interpreted from satellite images using a common methodology throughout Europe. The land cover dataset is used as key reference sources for spatial and territorial analysis and facilitate integrated environmental assessment. (EPA, 2018)

	expected landuse activity consistent with the provisions and objectives of the adopted Limerick City Development Plan. The intended use (and associated construction) can assimilate with surrounding landuse activities and thus the potential for significant adverse effects on densely populated areas can be ruled out.
Landscapes of Historical, Cultural or Archaeological Significance	There are no features of built, landscape or cultural heritage sensitivity applicable to the subject site which would be significantly and directly affected by the proposed development. The proximity and sensitivity of the neighbouring Architectural Conservation Area (ACA) – ‘ACA 1A South City Centre & Newtown Pery’ is noted, and the potential for significant effects to same is considered further in Section 6.2.3. The archaeological assets of the city area can be appropriately mitigated through normal and best practice measures discussed in further detail in Section 6.2.3.

Table 6.3 Location of Proposed Development Matrix

6.2.3 Characteristics of Potential Impacts

The following assessment considers; the types and characteristics of potential impacts taking into account the *Characteristics* and the *Location* of the proposed development and, with regard to the environmental factors specified in the definition of ‘*environmental impact assessment report*’. Consideration of ‘construction’ and ‘operational’ issues are assessed cumulatively in this assessment.

Screening Criteria	Description
Magnitude and spatial extent of the Impact	<p>The proposed development would not give rise to potential for significant effect consequent to its magnitude and spatial extent, having regard to the relatively limited site area which would be affected, and the nature of the proposed development.</p> <p>The nature, scale and form of the proposed development is consistent with the established scale, form and pattern of development on site and surrounding streetscape. The intended landuse activity is consistent with the spatial development objectives for the area set out in the Limerick City Development Plan 2010-2016 and reflected of established landuse activities occurring within this commercial centre.</p> <p>The subject site benefits from access to infrastructure services which have been confirmed to have sufficient capacity to accommodate the proposed development and activity.</p>
Nature of the Impact	<p>The nature of potential impact is thus limited to the likelihood or otherwise, of secondary effects occurring as a consequence of discharge of foul and surface waters entering the River Shannon which might give rise to effect to the water quality or habitats of that environment. However, as described in this assessment, there is no direct discharge to the River Shannon. Effects arising during construction can be appropriately managed through normal construction practices. During the operational phase, all foul water infrastructure is collected and discharged at acceptable flow rates to the EPA licenced municipal wastewater treatment plant at Bunlickey where sufficiency in capacity of that infrastructure has been confirmed. The nature of this impact is assessed below under the heading; ‘Biodiversity’.</p>
Transboundary Nature of the Impact	<p>The potential for transboundary effects, that is, effects of the proposed development occurring beyond sovereign state which is subject to separate legal provisions and instruments, will not arise and can be dismissed.</p>
Intensity and Complexity of the Impact	<p>Population & Human Health</p> <p>Temporal localised effects possible during construction phase but significant effects can be ruled out when carried out consistent with the CEMP and best practices given that the site currently forms part of an urban developed centre where similar landuses occur. No significant effects are predicted or are likely during operational</p>

(Considered under the different environmental variables)		phase given the supporting landuse and spatial development objectives for the subject site.
	Biodiversity	<p>Given that the subject site is already developed / disturbed ground, there is no direct effect to biodiversity.</p> <p>The subject site does not contain any habitat features nor does it support species which are afforded protection under National or European designation (i.e. Special Area of Conservation [SAC] or Special Protection Area (SPA) pursuant to the EU Habitats Directive) and thus no direct effects on same can be dismissed.</p> <p>The potential for indirect effect to biodiversity is considered in the context that wastewater from the subject site discharges to the municipal wastewater treatment system in Bunlickey, where thereafter, treated waters discharge from that facility to the River Shannon.</p> <p>The potential for, and extent of indirect effects, caused by indirect hydrological connection between the site and the River Shannon (and its Natura 2000 designations), has been examined and assessed under the separate AA Screening assessment (Openfield Ecological Services, 2020). That assessment has evaluated the sensitivity of those two Natura 2000 sites (Lower Shannon SAC Site code 002165 and the River Shannon and Fergus Estuaries SPA site code 004077) and identified a secondary pathway from the site via surface and wastewater water flows to the River Shannon and its estuary via the Bunlickey municipal waste water treatment plant.</p> <p>However, the AA Screening report identifies that water quality in the Upper Shannon Estuary (which is assessed as ‘unpolluted’) is not believed to be affecting any of the conservation objectives for the SAC/SPA within the intertidal zone. The Bunlickey municipal waste water treatment plant is operating under EPA approved licence and where capacity exists in that system for further loading sufficient to accommodate the proposed development. Furthermore, as the project is unlikely to give rise to fugitive sediments during the construction phase, the AA Screening report is satisfied that the potential for significant pollution is unlikely due to the distance from sensitive receptors, and, having regard to the temporary nature of the works. The AA Screening report confirms that tidal and coastal habitats are not sensitive to sediment pollution in the way that freshwater bodies are and thus no effects to Natura 2000 sites are likely to arise from this aspect of the development project.</p> <p>The conclusion, based on best scientific knowledge and in view of the conservation objectives of the site, ruled out the potential for significant adverse effects, individual or in-combination effects on the downstream sites (Lower Shannon SAC Site code 002165 and the River Shannon and Fergus Estuaries SPA site code 004077). The assessment report confirmed that no mitigation measures were relied upon in its determination, and, that Stage 2 Appropriate Assessment is not required. Consequently, the potential for <i>indirect</i> effects on European Sites can be ruled out. That scientific evaluation is sufficient to confirm for the purpose of EIA screening, that the potential for direct and indirect effects of the proposed development on biodiversity (including to both National and European designated sites) can be ruled out at this time.</p>
	Land & Soils	No significant effect likely given its city-centre location, the established development occurred on the land to date, and the spatial development objectives applicable to the site/area.
	Water & Hydrogeology	No significant water or hydrogeological effect likely subject to appropriate safeguards and design features incorporated during the construction phase. Sufficient capacity in infrastructure has been

		determined for the operation phase which rules out the potential for significant effects to the water or hydrological environment.
	Air & Climate	No significant air or climatic effect likely subject to appropriate safeguards and design features incorporated during the construction phase to avoid uncontrolled discharge of construction waters off site. Significant effect during operational phase is unlikely.
	Noise & Vibration	No significant noise and vibration effects likely subject to appropriate safeguards and design features incorporated during the construction phase. Significant effect during operational phase is unlikely.
	material assets, cultural heritage and the landscape;	<p>The potential for significant landscape and/or effect on built heritage can be dismissed having regard to the quality of architectural design of the proposed development which, as an extension to the existing building, extends the architectural design of the existing onsite 'Engine' building along Dominic Street.</p> <p>The scale, form and design of the proposed extension is consistent to the architectural style of the existing ('Engine') building. The main body of the development is orientated southward onto Dominic Street where that streetscape does not form part of the ACA (ACA 1A South City Centre & Newtown Pery') but which contains an eclectic mix of architectural style and quality. Notwithstanding that, the urban morphology of the area would remain unmodified and the potential effect on the adjacent architectural conservation area, would be negligible given that the proposed development, by virtue of its location and orientation (outside of the ACA), would not interfere or detract from the architectural or design character or setting of that ACA. The proposed development is likely to give rise to positive effects to the character and the architectural quality of the Dominic Street by the fact of its introduction of new and active commercial frontage within the city-centre.</p> <p>The potential for effect on the archaeological environment can, if considered necessary, and taking into account, the already disturbed nature of the subject site, be sufficiently mitigated by way of monitoring during excavation of the substratum for foundations or services.</p> <p>The potential for significant effects to material assets are thus considered as unlikely.</p>
	Interactions	Whilst the potential exists for possible interactions to occur between the proposed development and different environmental variables, no significant effect is anticipated to arise from an interaction where all best practice design and construction measures are adhered to, and, where all operational processes are conducted in accordance with relevant consents and environmental management practice and procedures.
Probability of the Impact		<p>Impacts associated with the construction phase will be temporary in nature. However, such effects are not considered to give rise to potential for significant effects on the environment.</p> <p>No significant impact is predicted to arise as a result of the operational phase of development having regard to the predicted and ordinary nature of the proposed landuse activity, the scale of development, and its urban developed location where sufficient infrastructure and capacity in the receiving environment can accommodate the development.</p>
Duration, Frequency and Reversibility of the Impact		Construction impacts reported, are likely to occur over at various stages over the construction period. Such impacts are likely to be intermittent depending on construction work strand and intensity of site operations at any given time. Such impacts are temporal and can be carried out consistent with best practice and accepted limits and thresholds.

The duration and frequency of operational impacts can for the purpose of EIA, be considered permanent. However, the operational effects are not predicted to give rise to significant effects on the environment.

Table 7.3 Characteristics of Potential Impacts

7.0 ASSESSMENT FINDINGS

This screening report has been carried out in accordance with a methodology that is based on Environmental Impact Assessment (EIA), Guidance for Consent Authorities regarding Sub-threshold Development (EPA, 2003), The European Commission Guidelines on EIA Screening (June 2001) and the provisions of the Planning & Development Act 2000 (as amended) and the Planning & Development Act 2001 (as amended).

7.1 Mandatory EIA Requirement

The development does not, either alone or in combination with other projects, exceed any of the thresholds set out in Schedule 5 of the Planning & Development Regulations 2001 (as amended) that would trigger a mandatory requirement to undertake Environmental Impact Assessment (EIA) and prepare an Environmental Impact Assessment report (EIAR).

7.2 Sub-Threshold Development EIA Requirement

The proposed development, as a sub-threshold development, has been assessed in accordance with the provisions of Schedule 7 and 7A of the Planning & Development Regulations 2001 (as amended) to determine a non-mandatory requirement for EIA. The conclusion, based on the detailed assessment presented in the previous section, is set out under the following headings;

7.2.1 Characteristics of the Proposed Development

The characteristics of the proposed development are unlikely to generate potential for significant effects on the receiving environment having regard to the intended commercial nature of the proposed development which is being advanced as an extension to an existing on-site building. Due consideration has been given to the potential for construction and operational effects, and, direct and indirect effects.

7.2.2 Location of the Proposed Development

The proposed development, having regard to the intended nature and characteristics of its intended (office) use, is appropriately located within the city-centre and is consistent with the spatial development objectives for the subject site, and the surrounding area. The subject site has negligible biodiversity value and is situated within a highly urbanised and developed location where similar landuse activities occur and are expected to occur. The architectural design of the proposed development is consistent with the established on-site building, and is compatible with, and

sympathetic to the scale, form and character of the existing built form in the streetscape and surrounding vicinity. The location is appropriately serviced with infrastructure to facilitate the proposed development.

7.2.3 Characteristics of Potential Impacts

Having regard to the characteristics of the proposed development, its location, and the availability and sufficiency of supporting infrastructure, the potential for significant effects on the environment can be ruled out. Effects arising during the construction phase are anticipated to be localised, primarily temporal in nature and duration, and, can be controlled to acceptable standards in adherence with best practice.

8.0 CONCLUDING STATEMENT AND RECOMMENDATION

Based on the assessment undertaken consistent with the relevant provisions and best practice, and, for the reasons set out above, it is concluded that the proposed development is unlikely to have significant effect on the environment and, that the proposed development does not require an Environmental Impact Assessment and the preparation of an Environmental Impact Assessment Report.

