Whitebox Student Campus Castletroy

Environmental Impact Assessment Screening Report

Groody Developments Limited

January 2025

HRA | PLANNING

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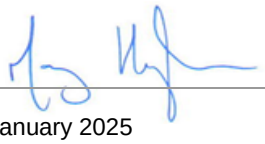
Signed		
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TABLE of CONTENTS

1.0 INTRODUCTION

1.1 Background

This Environmental Impact Assessment (EIA) screening report has been prepared by HRA Planning on behalf of Groody Developments Limited in relation to a proposed residential development on lands comprising 3.41 hectares in the suburbs of Limerick City This report has been prepared to inform the determination by the consenting authority (Limerick City & County Council) consistent with the provisions 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).

The obligation for EIA may arise from a mandatory or non-mandatory ('sub-threshold') requirement.

Where it is determined that there is no 'mandatory' requirement for EIA, the EIA Screening process advances to examine whether there is a non-mandatory, '*sub-threshold'* requirement for EIA based on the likelihood of significant environmental effects caused by the project in relation to the environmental sensitivity of its location and/or the characteristics of such impacts.

The author of this report holds qualifications in Environmental Impact Assessment Management and Town Planning. Mary Hughes has a Diploma in Environmental Impact Assessment Management from University College Dublin and has a Masters of Science Degree in Town Planning from Queen's University Belfast. Mary is a member of the Irish Planning institute and has over twenty six years' experience working in planning and in the area of Environmental Assessment. Over this period, Mary has been involved in a diverse range of project including contributions to and co-ordination of, numerous complex EIARs and EIA Screening Reports.

1.2 Legislation and Guidance

The EIA Screening Report has had regard to the following:

- Planning and Development Act 2000 as amended.
- Planning and Development Regulations 2001 as amended.
- Directive 2014/52/EU of 16 April 2014 amending Directive 2011/92/EU.
- The European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018).
- Guidelines on the information to be contained in Environmental Impact Assessment Reports, Environmental Protection Agency, 2022.
- Environmental Impact Assessment of Projects: Guidance on Screening, European Commission, 2017.
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment August 2018.
- Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding Sub-threshold Development 2003.
- Circular Letter: PL 05/2018 27th August 2018 Transposition into Planning Law of Directive 2014/52/EU amending Directive 2011/92/EU on the effects of certain public and private projects on the environment.
- Circular Letter: PL 10/2018 22 November 2018 Public notification of timeframe for application to An Bord Pleanála for screening determination in respect of local authority or State authority development

- Office of the Planning Regulator (May 2021) Environmental Impact Assessment Screening-Practice Note

1.3 Methodology

Pursuant to National Planning Guidelines[1] this examination is undertaken, based on professional expertise and experience, and the 'Source – Pathway – Target' model as appropriate having regard to the criteria set out in Schedule 7A of the Planning and Development Regulations 2001 (as amended).

The source-pathway-target model is an accepted method of assessing whether significant effects are likely to arise, considering; the source of likely impacts; the environmental factors that could potentially be affected; and the pathway by which those impacts may occur.

The EIA screening assesses the proposed scheme with reference to the relevant EIA legislation including the EIA Directive, and Planning and Development Regulations. The methodology has particular regard to the '3-Step' assessment process set out in the Office of the Planning Regulator (OPR) Environmental Impact Assessment Screening Practice Note PN02 (June 2021). Regard is also had to European and National guidance documents.

1.4 Data Sources

The information is obtained from review of several online databases and public sources including:

- Geological Survey of Ireland (GSI) online dataset - https://www.gsi.ie
- Limerick Development Plan 2022 - 2028
- Limerick City & County Council Planning Application Portal
- EPA - https://gis.epa.ie/EPAMaps/
- GeoHive – http://map.geohive.ie/mapviewer.html.
- Office of Public Works (OPW) - http://www.floodinfo.ie/map/floodmaps

In addition to the above a number of environmental and engineering reports have been prepared to inform the development proposal, as detailed in Section 4.0 of this report.

2.0 THE SITE AND SURROUNDINGS

2.1 Site Context

Located approximately 3.7km east of Limerick City centre, the site is situated within 1km of the University of Limerick, on a key arterial route (Dublin Road) into the city centre, south east of the Groody Roundabout. The general area comprises a mix of commercial and residential uses. The Dublin Road extending westwards towards the city primarily comprises a mix of commercial uses with the Parkway Shopping Centre and Retail Park situated north of the site, The Groody Road extending south of the site primarily comprises residential uses, including a number of residential blocks accommodating students. The Dublin Road extending eastwards away from the city largely comprises residential uses, whilst the road on the northern arm of the roundabout provides access to the University of Limerick, Castletroy Park Hotel and a number of other businesses in the general area.

[1] *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment August 2018*

The Groody River and associated Groody Green Wedge is located adjacent immediately west of the development site, maintaining a buffer between lands further west and the subject site. The purpose of this area is to maintain the area's importance in preventing the encroachment of the built-up area of Limerick City and to retain its important role as a wildlife corridor and a flood management zone.

The area already boasts established transportation links, ensuring public transport accessibility for its residents. The general area has excellent connectivity which will be further improved with future Bus Connect routes, intending to link the general area, and the site, with a bus service to the city every 10 minutes. There is a bus stop located immediately west of the subject site on the Dublin Road providing a direction connection to the city. The proposed site is well served by several bus routes including the following:

1. Route 310 on Groody Road – City Centre to National Tech Park. Freq: Every 30mins/7 days
2. Route 304 on Dublin Road – Ballycummin to UL. Freq: every 15mins Mon-Sat, 30mins Sun
3. Route 304a on Dublin Road – UHL to UL. Freq: every 30mins 7 days
4. Route 323 on Dublin Road – City Centre to Casteconnell. Freq: varies

These existing routes provide residents with easy high frequency access to the UL Campus, local amenities and the city centre including the main bus and train station.

Figure 1.0 Site Location & Context

2.2 Site Description

The proposed development site is located in a mixed urban area, adjoining the Groody Green Wedge. The site is bound to the west by Groody River; to the north by the R445 and an existing car dealership, filling station and fuel depot; to the east by Groody Road and to the south by greenfield. The site is

relatively flat with a small fall from Groody Road along the eastern boundary of the site to the River Groody. There is approximately a 1-2m fall in level from east to west across the site. The level of the site adjacent to the existing Groody Road varies from 9.50m OD to 7.50m OD while the levels vary from 9.50m to 6.50m along the northern boundary.

Patches of tall overgrown bushes are scattered throughout the site and evidence of significant ground disturbance was noted mainly along the eastern boundary of the field. Such disturbance was observed in the form of artificially uneven terrain, soil heaps, ground reduction and hardstands. It also appears possible that excess soil from ground excavation was largely spread out towards the middle portion of the field, implying that the subject site might have been landscaped/levelled to a certain extent.

Running adjacent to the west of the site is the Groody River that discharges directly into the River Shannon and therefore the Lower River Shannon SAC and River Shannon and River Fergus Estuaries SAC down river. To the south of the site is a drainage ditch which flows directly into the Groody River. Whilst part of the overall site is located on land that is subject to flooding from the River Groody, the CFRAMS confirms that the area of land where it is proposed to locate all buildings is in Flood Zone C and outside of the identified flood zone.

The site is currently grazed by horses. There are no protected or designated sites in or within the vicinity of the site, including landscape designations.

2.3 Environmental Site Characteristics

The information set out below was derived from the data available within the EPA Mapping Tool, the Limerick City & County Council Planning Application Portal and the relevant local statutory planning documentation, including the Limerick Development Plan 2022 – 2028.

2.3.1 Bedrock & Soils

The site has bedrock geology of calcareous, basalts and other volcanic rocks (Geological Survey of Ireland (GSI), 2024). The soil type overlying the bedrock geology on the site is basic deep, poorly drained, mineral soil derived from marine and estuarine sediments (Teagasc, 2024).

The GSI/Teagasc soils maps describe the soils as shallow well drained mineral (Mainly acidic) derived from mainly non-calcareous parent materials. The site and the surrounding area are mapped as having ‘High’ subsoil permeability; with areas to the east and west outside the site confines having ‘Moderate’ permeable soils.

An Environmental Subsurface Investigation Report by ELS dated 15th March 2010 confirms that the previous site owner was issued a Waste Permit from Limerick Co Council in 2001. It is understood that the waste permit allowed for the import of clean inert building rubble and subsoil onto the site. The investigations carried out by ELS have revealed the depth of imported fill material was observed to range between 1.2-4.2m BGL. Beneath the imported waste materials, recent trial pits confirm the natural as comprising grey/blue SILT and at one location as a dark brown peaty horizon.

2.3.2 Hydrology

The CFRAMS fluvial study and Strategic Flood Risk Assessment undertaken in support of the Development Plan confirms that a small portion of the site is located in Flood Zone A and Flood Zone B. A series of mitigation measures against flooding have been adopted in the design of the

development, namely constructing the development within the zoned lands outside the flood zone, maintaining a green open space for the flooding to occur, raising building levels well in excess of predicted flood levels and maintaining access above the flood level from the adjoining existing road in case of emergency. All development within the site is being undertaken within Flood Zone C and the Flood Zone A & B areas are being maintained.

Running adjacent to the west of the site is the Groody River that discharges directly into the River Shannon and therefore the Lower River Shannon SAC and River Shannon and River Fergus Estuaries SPA down river.

The status of the Groody River that runs to the immediate west of the proposed site is characterised as having Moderate ecological condition (2021) and At Risk of not meeting its Water Framework Directive objectives by 2027. The ecological status is determined by the macroinvertebrate community. Between 1971 and 1983 the river was at Good status. In 1985 it dropped to Poor status and has remained at Poor or Moderate up to 2021, except once, in 2012 when it achieved Good status. According to a recent report[2] prepared by the Local Authority Waters Programme in 2020, the second significant pressure in Groody 010 is diffuse run off from urban areas. Misconnections, particularly in the upper reaches of the river, have been identified as a significant pressure by Limerick City and County Council.

2.3.3 Ecology & Biodiversity

An Ecological Impact Assessment (EcIA) was undertaken by Russell Environmental and Sustainability Services Ltd. There are no protected fauna or habitats on site and the habitat value is deemed negligible. The site is currently grazed by horses and there was no evidence of other mammals on the site at the time of surveying. No overwintering waterfowl species were identified on the site.

A bat assessment was undertaken during the EcIA site survey on 6th of January 2024, for the suitability of habitats onsite to support bat roosting, foraging and commuting. All trees on site were inspected in accordance with guidance (Kelleher & Marnell, 2006). The treeline adjacent to the drainage ditch was surveyed for suitable trees for bat roosts and it was deemed unlikely that any were suitable as bat roosts. In any event, the trees adjacent to this drainage ditch (at the southern boundary of the site) will remain undisturbed as part of the development.

In addition, there was only one mature tree on site suitable as a bat roost, a White Willow *Salix alba,* which is located on adjoining lands outside of the application site. This tree will remain undisturbed as from the proposed development and will not be impacted by the proposed blue/green infrastructure for the area.

2.3.4 European Sites

A Natura Impact Statement prepared by Russell Environmental and Sustainability Services Ltd. The proposed development site is located outside the boundary of European Sites. No pathways for direct impacts as a result of the development on any of the QIs/SCIs of any European Site were identified. Emissions to surface water were identified as a pathway for potential indirect effect on the Qualifying Interests of the Lower River Shannon SAC and River Shannon and River Fergus Estuaries SPA,

[2] *Groody PAA Desk Study Southwest Region Local Authority Waters Programme 2020*

including potential surface water pollution/particulate matter during construction and operation of the proposed development.

Mitigation measures to avoid the potential for any significant impacts via any of the pathways identified are detailed in the NIS and as a result the report concludes it can be excluded, on the basis of objective scientific information, that the project, individually or in combination with other plans or projects, will not affect the integrity of the European Sites (Lower River Shannon SAC and River Shannon and River Fergus Estuaries SPA).

2.3.5 Designated Sites

There are no protected or designated sites in or within the vicinity of the site, including landscape designations. Kennedy Fitzpatrick Landscape Architects (KFLA) has determined the landscape as being of low to medium sensitivity having regard to its zoning provisions in the development plan and surrounding built character. The visual sensitivity of receptors was also determined to be low to medium, with the view from the towpath along the River Shannon (VR14) the only highly sensitive viewpoint.

2.3.6 Archaeology & Cultural Heritage

A Desktop Archaeological Assessment has been prepared by John Cronin & Associates which accompanies this planning application. The report concludes that portions of the field to be developed shows evidence of ground disturbance likely caused by previous developments in the recent past. None of the recorded archaeological sites within 1km study area are located within the subject site and no visual evidence of previously unrecorded archaeological heritage was noted.

The subject site is considered to possess a low to medium archaeological potential, and a programme of test trenching within the viable portions of the site is recommended in advance of any site development works

2.3.7 Population

The subject site is located in an area of Limerick City identified for growth, in an area identified as an Intermediate Urban Location / Transport Corridor.

If one examines the population within a 1km radius[3][3] of the site, the area had a population of only 10,351 persons in 2022. The low population reflects the largely commercial / undeveloped nature of land to the north and east of the site. The general area comprises a mix of commercial and residential uses. The Dublin Road extending westwards towards the city primarily comprises a mix of commercial uses with the Parkway Shopping Centre and Retail Park situated north of the site, The Groody Road extending south of the site primarily comprises residential uses, including a number of residential blocks accommodating students. The Dublin Road extending eastwards away from the city largely comprises residential uses, whilst the road on the northern arm of the roundabout provides access to the University of Limerick, Castletroy Park Hotel and a number of other businesses in the general area.

The subject site is zoned for 'New Residential purposes (2.1 hecatres) and as the 'Groody Valley Green Wedge' (1.2 hectares) in the Development Plan. The objective of the new residential zoning is "*to*

[3]*There are 37 Small Areas of Population (SAPs) within or immediately adjacent to 1km buffer distance from the site*

*provide for new residential development in tandem with the provision of social and physical infrastructure". Its purpose is "*is intended primarily for new high quality housing development, including the provision of high-quality, professionally managed and purpose built third level student accommodation".

The objective of the 'Groody Valley Green Wedge' is "*to preserve and protect the Groody Valley from development". Its purpose is "to* maintain the area's importance in preventing the encroachment of the built up area of Limerick City and to retain its important role as a wildlife corridor and a flood management zone".

2.4 Planning History

There is some planning history on the subject site, although none is directly relevant to the subject proposal.

The north eastern corner of the site, fronting the roundabout was granted planning permission for a hotel in 1998 under P98/1033.

A pitch and putt golf course was proposed on land, excluding the north eastern portion fronting the roundabout, in 2008, planning reference 08/1402. However, planning permission was subsequently withdrawn

3.0 PROPOSED DEVELOPMENT

3.1 Description of Development

The extent of the proposed development on a gross site area of 3.41 hectares of land but with a net developable area of 1.88 hectares (excludes the Groody Green Wedge which is to be landscaped), as described in public notices, provides for a development consisting of 196 no. bed clusters across 5 no. separate blocks, ranging in height from 5 - 8 storeys, with a total of 1,400 no. student bedspaces to be delivered in two phases of development. A seven year permission is sought to facilitate construction. The composition of each block is detailed hereunder:

- Block A comprising 8 storeys provides for 28 no. bed clusters and 224 no. bedspaces; Student library; Student union; Plant room; Bin store; and Bicycle store;
- Block B comprising 7 storeys provides for 52 no. bed clusters and 400 no. bedspaces; Reception & Office; Post room; Laundry room; Student canteen; Maintenance store; Plant room; ESB sub-station & switch room; Bin Storage; and Bicycle store;
- Block C comprising 6 storeys provides for 51 no. bed clusters and 355 no. bedspaces; Student Gym; Maintenance store; Plant room; ESB sub-station & switch room; Bin Storage; and Bicycle store;
- Block D comprising 6 storeys provides for 32 no. bed clusters and 211 no. bedspaces; Reception & Office; Post room; Laundry room; Student canteen; Student supply retail unit (60m2); Plant room; Maintenance store; Bin Storage; and Bicycle Storage;
- Block E comprising 5 storeys provides for 33 no. bed clusters and 210 no. bedspaces; Reception & Office; Laundry room; Maintenance store; Bicycle store; and Plant room.

Planning permission is also sought for use of the accommodation, outside of student term time, for short-term letting purposes. Ancillary site development works including car parking provision; boundary

treatments; roof plant; public lighting; water supply; foul and surface water drainage infrastructure; signage; and a temporary construction access to facilitate Phase 2. The site will be accessed via the Groody Road.

Extensive landscaping proposals, include landscaped courtyards; (pedestrian and cycle connections from the Groody Road to the Groody Valley Green Wedge; natural landscaping and public walkways within the Groody Valley Green Wedge; and a Constructed Wetland area adjacent to the Groody River.

Figure 2.0 Site Layout Plan

3.2 Water Services Infrastructure

An Engineering Services Report has been prepared by Garland Engineers which details water service specifications.

Foul Water

A new foul water drainage system will be constructed to collect and convey the foul water flow generated by the development. It is proposed to provide a single gravity foul sewer system for the development, discharging to an existing combined sewer east of the development below the Groody Road

Potable Water

It is proposed to provide a 160mm OD watermain with hydrants and to connect the development to the existing 300mm diameter east of the development below Groody Road.

Surface Water

The management of surface water will be via the use of Sustainable Drainage solutions (SuDs) incorporated into the proposed development including bioretention systems; bioretention swales; green roofs; wetland; catchpit manhole; bypass interceptor; and hydrobrake limiting flow to Qbar greenfield rates. The surface water runoff rate has been restricted to the greenfield runoff rate and an allowance of 30% climate change and 10% urban creep has been included in the design.

The storm drainage from the car parking spaces roads and footpaths will be collected in gullies and discharged via a traditional storm pipe network to attenuation systems. Given the topography of the site and available green spaces, an attenuation tank cascading to a wetland is proposed. The attenuation tank attenuates the southern section of the development prior to discharging to the wetland. The wetland attenuates surface water flow from the northern section of the development. The attenuated flows from the wetland will discharge to the Groody River via a headwall at the western site boundary a rate of 3.75l/s.

The construction of the no. 2 headwalls on the proposed surface water system within the wetland shall be carried out in close proximity to the River Groody. Prefabricated headwalls are proposed in order to minimise the use of materials that may cause polluting effects to the existing river. The raised earthworks for the wetland will be constructed prior to the installation of the headwalls which will create natural barrier for these works to take place within. The outfall from the wetland will consist of an outfall flow control manhole adjacent to the wetland and a pipe network which will direct the water flow from the wetland to the watercourse. The outfall manhole shall also be prefabricated.

Mitigation measures are proposed for the control of surface water during construction as detailed in Section 3.1.1.1.of the CEMP, including the construction of a berm on the western site boundary, drainage ditches and silt fencing.

3.3 Phasing

It is proposed to advance the development in two distinct phases as detailed in Figure 3.0 and to facilitate construction a seven year permission is sought, thereby ensuring adequate time to complete the development. Phase 1 will be the completion of Blocks C, D and E whilst Phase 2 will be the completion of Blocks A and B

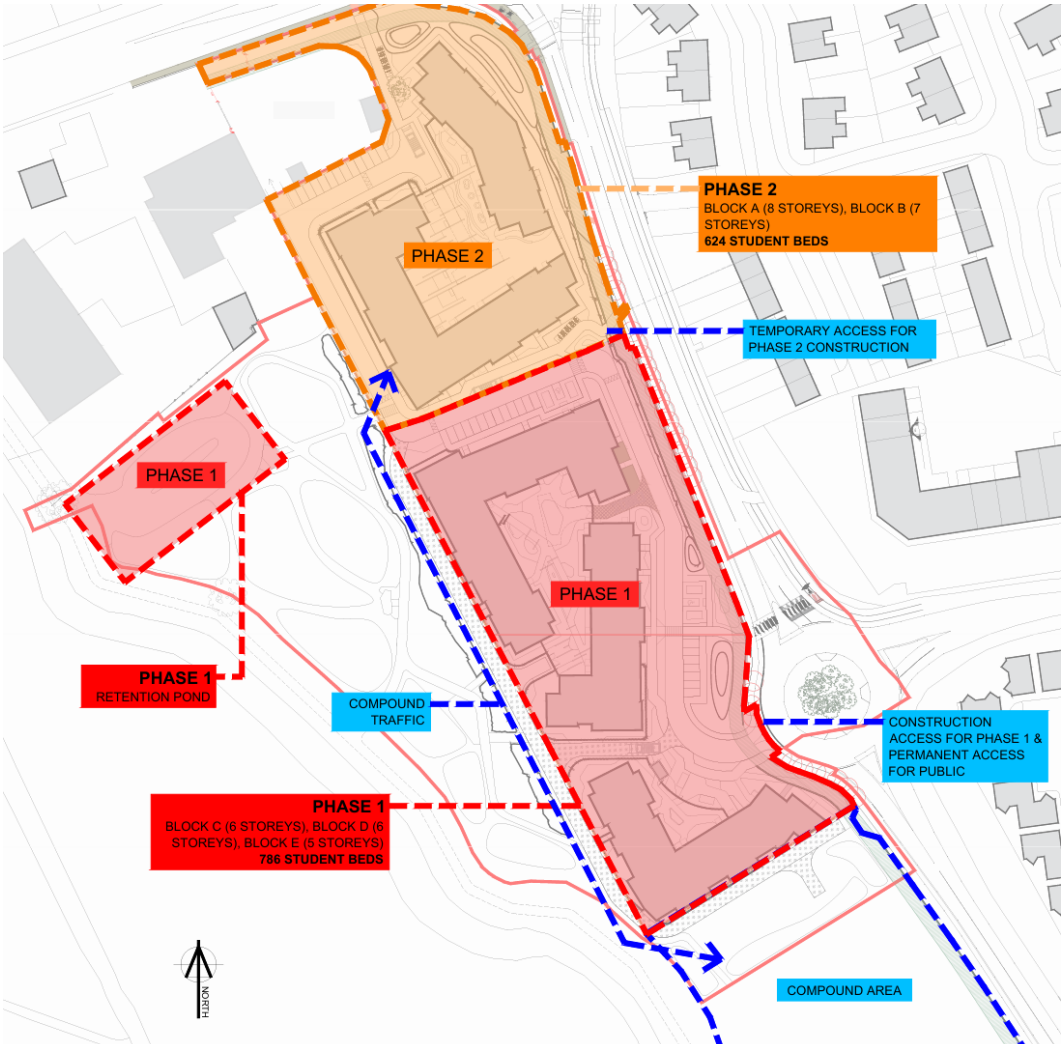


Figure 3.0 Proposed Phasing Strategy

3.4 Construction Programme

Subject to securing consent, it is intended for the main works to commence in Q1 2026. The timeline is indicative at this stage and is subject to change depending on the planning application process and other external factors including existing supply chain constraints at the time of going to market. It is assumed that all construction related activity will be undertaken in accordance with best practice / industry guidance and shall adhere to relevant emission, discharge and noise limit thresholds during construction. An Outline Construction & Environmental Management Plan (CEMP) has been prepared by Garland Engineers in support of the development proposal and will be implemented by the appointed Contractors on site.

Construction operations on site shall generally be limited to standard hours of operation for building sites as follows:

· Monday to Friday 07.00 to 19.00
· Saturday 07.00 to 14.00
· Sundays and Public Holidays no noisy work on site.

It may be necessary for some construction operations to be undertaken outside these times. For example, it may be necessary to make service diversions and connections outside the normal working

hours. Deviation from these times may be permitted in exceptional circumstances, where prior written approval has been received from the relevant local authority.

3.5 Construction Process

Construction access shall be from the Groody Road. Prior to the commencement of topsoil stripping and earthworks operations, site-specific surface water management measures will be implemented as detailed in Section 3.1.1.1 of the Construction environmental Management Plan (CEMP). Silt fencing will be installed strategically around and through the site and a berm shall be constructed along the western site boundary. Drainage ditches will be installed to intercept surface water where there is a risk of significant water flow into excavations, adjoining lands or the River Groody. The run-off will be directed through appropriately sized settlement ponds or tanks to remove suspended solids.

Site Clearance

To facilitate the earthworks operation, site clearance will have to be carried out to remove vegetation. Removal of woody vegetation shall only take place outside the bird breeding season (1st March to 31st August). No removal of habitats or movement of construction machinery will occur outside of the development works area/ footprint during the construction phase. Existing trees and hedgerows shall be retained where possible.

Temporary surface water management measures will be put in place prior to stripping of topsoil and will remain in place until the completion of the development. Topsoil will be stripped from the area to be developed. All excavated topsoil will be stored in dedicated stockpiles with environmental controls in place. Topsoil stripping across these limited areas will be monitored by an archaeologist under license by the National Monuments Service. If archaeological features are revealed during the monitoring programme, these features will be recorded in written, drawn and photographic formats and remain in situ until consultations are undertaken with the National Monuments Service on the appropriate mitigation strategy.

Earthworks

A large proportion of the site has previously been filled with construction and demolition waste, mostly clay with stones and boulders but also containing waste associated with being from construction sites. The envisaged strategy for the site is of segregation and reuse where possible on site but disposal where required to licensed facilities. An outline methodology is outlined herewith:

- Produce a Remediation Strategy
- Obtain appropriate licenses to undertake the remedial works.
- Surface water management measures to be put in place
- Excavation of made ground and transport to a designated treatment area within the site.
- Processing the made ground through a 100mm screener and picking station to remove oversize and unacceptable materials.
- Disposal of unacceptable picked waste material removed from the soils at suitable licenses waste disposal / recycling facility
- Placement of the picked soils back in the excavation and compaction with stabilization if deemed appropriate and necessary
- Onsite environmental monitoring during the works and provision of dust mitigation and odour suppression during the works.
- Provision of a Validation Report detailing the works undertaken.

Based on this analysis, the area of the site to be remediated is in the order of 20,000m2 and a volume of fill to be in the order of 70,000m3. Based on the previous classification of trial holes being 90% of trial hole material being clay with stones and boulders, 63,000m3 of the material will be reused on site and 10% of the material, being 7,000m3 of the material having to go off site to a licensed waste recycling material and disposal facility to a waste or recycling stream suitable to the material being brought off site.

The proposed buildings will be constructed on a foundation designed specifically by the appointed structural engineers, who will have considered the loading requirements for this superstructure.

Where filling of the site is required, approved and selected fill materials will be imported to the site. Given the aforementioned remediation strategy envisaged for the site and that existing material will be removed to licensed facilities along with the compaction of existing material ono the site, there will be a loss of material and it will not possible to avoid the use of some imported fill. The fill will then be placed by dozers and compacted using vibratory rollers. A testing regime will be implemented to ensure the acceptability of the fill and that the degree of compaction is sufficient. Fill will be brought to the required level across the site to allow construction of roads and floors.

Construction of Buildings

On completion of the bulk earthworks, construction of remaining building rising elements and / or foundations for the buildings will commence. The exact construction sequence has not been determined, but it will be similar to what is described below:

• Completion of foundations and rising elements
• Construction of ground floor
• Erection of reinforced concrete frame
• Construction of floors and roof slab and rising elements between levels
• Facades
• Fit out

4.0 OTHER RELEVANT STUDIES / ASSESSMENTS

This assessment is cognisant of, and refers to a number of technical assessments submitted with the planning proposal, inclusive of relevant mitigation measures including;

- Appropriate Assessment Screening Report
- Natura Impact Statement
- Ecological Impact Assessment
- Civil Engineering Report
- Construction Environmental Management Plan
- Operational Waste Management Plan
- Construction Resource Waste Management Plan
- Acoustic Assessment
- Energy Report
- Air & Climate Assessment
- Archaeological Report
- Flood Risk Assessment
- Daylight & Sunlight Analysis

- Landscape & Visual Impact Assessment
- Wind Microclimatic Study
- Traffic Impact Assessment
- Mobility Management Plan

5.0 EIA SCREENING

5.1 Step 1 – Understanding the Proposal

The Office of the Planning Regulator (OPR) has issued guidance on EIA screening in the form of the Environmental Impact Assessment Screening- Practice Note, May 2021 which aids planning authorities as the Competent Authority (CA) in this area. This report has had regard to the OPR guidance and methodology. The proposed application is a project for the purpose of Environmental Impact Assessment (EIA) under Stage1 (a) of the OPR guidance.

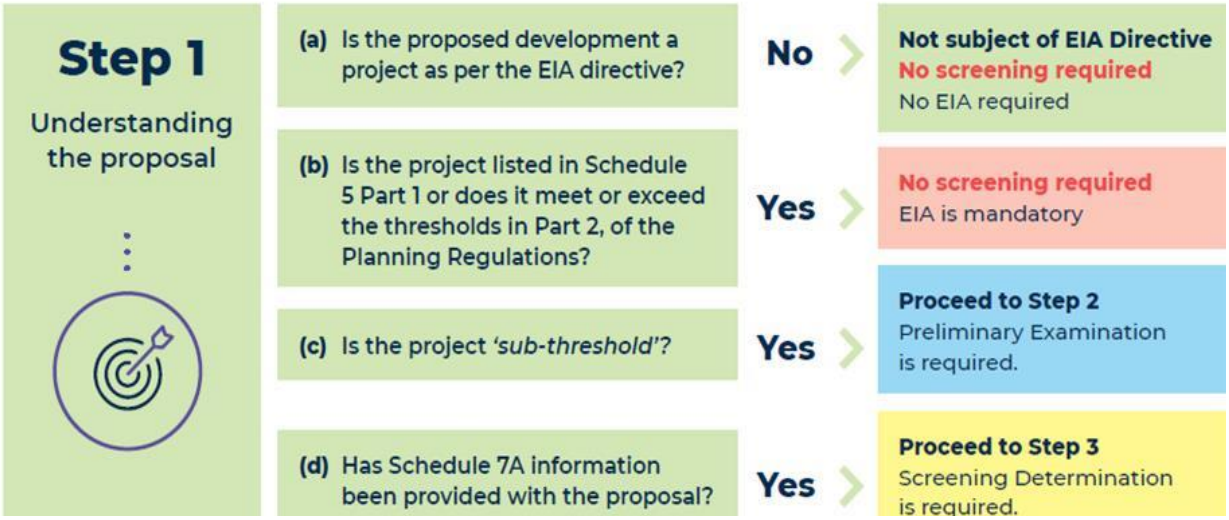


Figure 4.0 Extract from OPR EIA Screening Guidance Note4

A list of the types or classes of development that require EIA or Screening for EIA is provided in Part 1 and Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended. 'Sub-threshold development' comprises development of a type that is included in Part 2 of Schedule 5, but which does not equal or exceed a quantity, area or other limit (the threshold).

The following table assesses the proposed development in the context of the mandatory EIA threshold relevant to this project.

Legislative Provision	Mandatory EIA Threshold	Assessment	Is EIA required on this basis?
Planning and Development Regulations 2001 (as amended), Schedule 5, Part 2: **Project Type 10. Infrastructure projects** *Class (b)(i) Paragraph 10:*	*"Construction of more than 500 dwelling units"*	The proposed development of 1,400 bedspaces equates to 350 no. residential units[4] which is below the 500-unit mandatory threshold and represents 70% of the threshold number of dwelling units.	No
Class (b)(iv) Paragraph 10:	*"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).*	The site area of the proposed development measuring circa 3.41 hectares in area is not situated within a business district and is significantly below the 10-hectare threshold for urban development in the case of; 'other parts of a built-up area'.	No

Table 1.0 Screening Matrix for Mandatory EIA

The proposed development is a project as per the EIA Directive, but it does not exceed any of the thresholds set out in Schedule 5 of the Planning and Development Regulations 2001 (as amended) that would trigger mandatory requirement to undertake EIA.

The project is thus under the threshold for Mandatory EIA and can thus be considered a 'sub-threshold' development for the purposes of EIA with reference to the above thresholds. Under Step 1(c) of the OPR guidance a preliminary examination is required under Step 2.

[4] *4 bedspaces equates to 1 no. unit for density purposes as per Sustainable Residential & Compact Settlement Guidelines*

5.2 Preliminary Examination

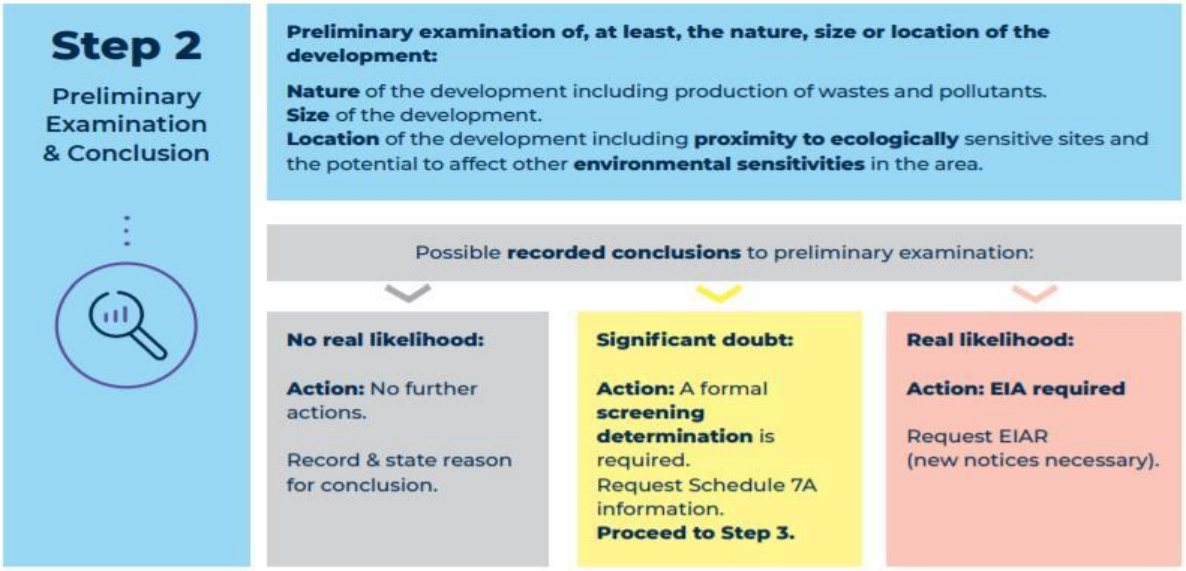


Figure 5.0 Extract from OPR EIA Screening Guidance Note

The 'sub threshold' assessment is conducted pursuant to the provisions of Article 120(1) of the Planning and Development Regulations 2001 (as amended) in relation to 'Sub-threshold EIAR' which sets out the requirement for the Planning Authority, to carry out a **preliminary examination** of at least; *the nature, size* and *the location* of the development in order to determine a requirement for environmental impact assessment and the preparation of an Environmental Impact Assessment Report (EIAR).

The conclusions from the **preliminary examination** are intended to confirm one of the following:

i. there is **no real likelihood** of significant effects on the environment arising from the proposed development, or
ii. there is **significant and realistic doubt** in regard to the likelihood of significant effects on the environment arising from the proposed development; or
iii. there is **a real likelihood** of significant effects on the environment arising from the proposed development.

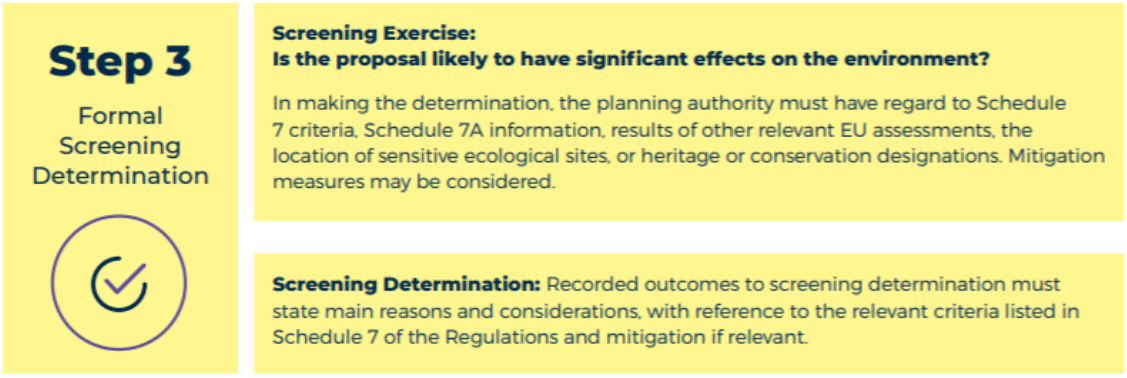
Where there is no real likelihood of significant effects, it can be concluded that EIA is not required. Where there is significant and realistic doubt, the provisions of Article 120 dictate that the Authority shall prepare, or cause to be prepared, the information specified in Schedule 7A (of the aforementioned regulations) for the purposes of a screening determination. Where there is a real likelihood of significant effects, then the proposed development will be subject to environmental impact assessment and cause an environmental impact assessment report (EIAR) to be prepared.

The size of the proposed development is not exceptional in the context of and existing urban environment and the wider objectives of national and local policy to increase density and promote compact growth. However, having regard to the traditional suburban nature of some of the housing in the general area, with intermittent higher buildings, the proposed development presents a visual change on a prominent site. The site characteristics and location results in a number of environmental sensitivities including visual impact, flood risk, acoustic levels, proximity to the Groody River with associated hydrological links to the Lower River Shannon SAC and River Shannon and River Fergus Estuaries SPA. Thus, having regard to the nature and scale of the development and the site

characteristics, there is significant doubt in regard to the likelihood of significant effects on the environment arising from the proposed development.

Thus, consistent with statutory provisions of Article 120 of the Planning Regulations, along with the published methodological guidance which this assessment is based; a formal screening determination is required and the information specified in Schedule 7A (of the aforementioned regulations) for the purposes of a screening determination is provided.

6.0 SCREENING DETERMINATION – SCHEDULE 7 ASSESSMENT AND SCHEDULE 7A INFORMATION



Where the requirement to carry out EIA is not excluded at preliminary examination stage, because there is doubt in regard to the likelihood of significant effects on the environment arising from the proposed development, the planning authority must carry out a screening determination.

In making its screening determination, the competent authority must have regard to:

- Schedule 7 criteria,
- Schedule 7A information,
- Any further relevant information on the characteristics of the development and its likely significant effects on the environment submitted by the applicant,
- Any mitigation measures proposed by the applicant,
- The available results, where relevant, of preliminary verifications or assessments carried out under other relevant EU environmental legislation, including information submitted by the applicant on how the results of such assessments have been taken into account, and
- The likely significant effects on certain sensitive ecological sites

6.1 Schedule 7 Criteria & Schedule 7A Information

The 'Environmental Impact Assessment (EIA) Guidance for Consent Authorities Regarding Sub-Threshold Development', groups criteria for deciding whether or not a proposed development would be likely to have significant effects on the environment under three headings which correspond to the updated Schedule 7, including:

- Characteristics of the proposed development.
- Location of the proposed development.
- Characteristics of potential impacts.

6.1.1 Characteristics of Proposed Development

Size of the Proposed Development

The size of the development is not exceptional in the context of the existing urban environment. Whilst the subject site has a gross area of 3.41 hectares, the net developable area comprises 1.88 hectares. Some 1.2 hectares of the overall site has been developed as a public park, for the beneficial use of students occupying the development and for the surrounding community. Development of the subject site for residential use and public park provision is consistent with, and responsive to the statutory land use and spatial development objectives for the site as set out in the Limerick Development Plan 2022-2028.

The number of student bed spaces have been designed responsive to regional and national objectives on compact growth/sustainable development, which seek higher residential densities in urban areas and in proximity to public transport. The proposed development is consistent with local, regional and national policy, particularly in delivering compact growth within the existing built-up envelope of urban areas.

Cumulation with other proposed developments

The relevant planning history for the area is outlined in Section 2.4 above and no relevant consents apply to the subject site. There is no other permitted development around the site having regard to the location of the site largely surrounded by the Grood Valley Green Wedge. The Horizon site located on the western side of the Groody remains undeveloped and with no planning permission in place.

There is substantial development occurring at the southern end of the Groody Road, comprising the development of a new hospital and a recently completed post primary school. Planning permission has also been granted for a new supermarket, although this development is currently under construction. However, these developments are well removed from the site and are unlikely to result in cumulative impacts. These developments have been subject to EIA Screening Determination and it has been determined that no significant effects arise from those developments. Further, neighbouring permitted developments will be obliged to operate within acceptable, established environmental parameters which will mitigate the potential for adverse impacts. Further, development has been conditioned to be managed in accordance with a CEMP to be agreed with the panning authority.

Overall, there are no likely significant cumulative environmental effects resulting from the proposed development when considered in combination with other permitted development.

Nature of any associated demolition works

Demolition works are not proposed on site.

Use of natural resources

The land cover comprises grass, trees, and scrub. The land is zoned for residential purposes. The proposed use of natural resource of land is not considered to be significantly different to the existing surrounding areas which have already ben developed.

<u>Construction</u>

According to the Resource & Waste Management Plan prepared by Garland Engineers, the area of the site to be remediated is in the order of 20,000m2 and a volume of fill to be in the order of 70,000m3.

Based on the classification of trial holes being 90% of trial hole material being clay with stones and boulders, 63,000m3 of the material will be reused on site and 10% of the material, being 7,000m3 of the material having to go off site to a licensed waste recycling material and disposal facility to a waste or recycling stream suitable to the material being brought off site.

Energy, including electricity and fuels, will be required during the construction phase. The construction process will include use of various raw materials. No out of the ordinary use of natural resources is likely during the construction process.

In terms of biodiversity, the site is predominantly agricultural in nature. The lands will be developed in a permanent manner with new planting and trees forming part of the landscape proposal. The EcIA confirms that the proposed development will provide an increase in biodiversity and net gain in the conservation value of the proposed habitats to be created, having regard to the extensive landscaping proposed and the wetland to be created in proximity to the Groody River.

Operation

Water, consumption of electricity and energy related to the occupancy of the residential units will be required. The Civil Engineering Report prepared by Garland Engineers confirms that there will be adequate services available to serve the development. The foul and process water drainage infrastructure has been designed in accordance with Irish Water Technical Standard for Wastewater Gravity Sewers and the Irish Water Code of Practice for Wastewater Infrastructure.

Water, consumption of electricity and energy related to the occupancy of the residential units will be required. No out of the ordinary use of natural resources are likely during the operational phase.

Whilst the proposed development will result in change and will impact the use of natural resources such likely effects are considered to be slight, adverse, and short term in nature. No significant, negative, long term impacts are likely.

Production of Waste

Construction

All inert material and non-hazardous waste will be disposed of from the site in accordance with the categorisation of waste and in accordance with the relevant licensing and regulatory requirements.

A Resource Waste Management Plan (RWMP) has been prepared to manage the disposal of waste from the site and proposes a number of mitigation measures to facilitate recycling and reuse. Whilst project specific resource and waste management targets for the site have not yet been set and this information should be updated for these targets once these targets have been confirmed by the client. However, it is expected for projects of this nature that a minimum of 70% of waste is fully re-used, recycled or recovered.

Operation

Operational waste generated will be domestic waste from the residential units. All domestic waste will be disposed of by a licensed waste contractor. The Operational Waste Management Report prepared in support of the development proposal predicts that circa 8,500kg of waste per week will be generated by the development proposal. Bins for nixed non-recyclables, dry mixed recyclables, organic waste

and glass waste shall be accommodated in the ground floor of each block of development to accommodate and manage waste from the site.

No significant negative impacts are likely.

Pollution and Nuisances

Construction

The Stage 1 Appropriate Assessment Screening identified the potential for pollution of the adjoining Groody River in the form of emissions from surface water resulting from the construction of the proposed development. During construction the contractor will be required to implement standard measures during the construction phase. These measures are detailed in Section 3 of the CEMP and are identified as mitigation measures in the NIS.

In addition to the erection of a silt fence, it is proposed to erect a berm on the western boundary around the construction site, to prevent any runoff of particulate matter/pollution into the nearby drainage ditch and River Groody. This will be constructed at least 10m from the River Groody and the drainage ditch to protect the riparian zone and any areas of seasonal flooding as per the Inland Fisheries Ireland Guidelines.

The construction phase of the project also has the potential to be a source of pollution in relation to noise, vibration, dust and traffic. There will likely be potential for localised dust and noise produced during the construction phases. This will be managed by ensuring construction work largely operates within the approved hours of construction. Standard dust and noise prevention mitigation measures as detailed in the CEMP and Acoustic Design Statement will be employed and monitored.

There will be vehicular movements to and from the site that will make use of existing roads. Due to the nature of these activities, there is potential for the generation of elevated levels of noise.

Operation

The main source-pathway-receptor linkages associated with the proposed operations and water include the potential leakage of vehicles and machinery that could potentially migrate to groundwater and then horizontally to the local river; and silt laden surface water runoff from the site that could potentially flow into the river. The risks associated with these risk linkages are deemed to be very low as a number of measures have been proposed to intercept surface water runoff and storm water runoff. These include a constructed wetland, attenuation tank complete with hydro-brake flow controls and bypass separators for metals and hydrocarbons, green roofs, bio-swales and rain gardens. The purpose of the SuDs measures is to mimic natural drainage, which is now reduced due to the creation of man-made surfaces in the form of dwellings and associated impermeable surfaces as part of the development. The proposed attenuation tanks and SuDs measures will intercept and delay the runoff, thus slowing it down to facilitate the settling out of any pollutants. Therefore, this removes the risk to any watercourses in the vicinity of the development and thus the potential pathways for impact on the qualifying species and habitats of the SAC and SPA. In addition, to protect the riparian zones for the River Groody and drainage ditch, all footpaths should are distance of greater than 10m from the watercourses.

Any potential effects are considered to be imperceptible, short term in nature and are unlikely with mitigation in place.

Risk of Major Accidents

The risk of major accidents is not considered likely having regard to the nature of development proposed and adherence with Building Regulations and environmental controls during construction. Further the subject lands are not proximate to any Seveso site. There are no technologies or substances to be used in the development which may cause concern for having likely significant effects on the environment. There is no significant risk of accidents or disasters.

Risks to Human Health

Construction

The nature of the proposed development and the engineering provisions will not lead to the likelihood of any risk to human health. Any risk arising from construction will be localised and temporary in nature. The proposed development is of standard construction method and of appropriate scale and does not require the use of particular substances or use of technologies which of themselves are likely to give rise to significant environmental effects. There are no Seveso / COMAH sites in the vicinity of this location.

The subject site is underlain by a Locally Important Aquifer which has Extreme Vulnerability. The bedrock is Moderately Productive only in Local Zones. There is rock at or near the surface. Mitigation measures for the management of potential groundwater contamination are detailed in Section 3.1.1.2 of the CEMP. Silt fencing and settlement ponds shall be placed in areas with low bedrock levels where there is at least 1m of soil above the bedrock.

Operation

Foul water will discharge to the public sewer. The storm drainage from the car parking spaces roads and footpaths will be collected in gullies and discharged via a traditional storm pipe network to attenuation systems. Given the topography of the site and available green spaces, an attenuation tank cascading to a wetland is proposed. The wetland attenuates surface water flow from the northern section of the development. The attenuated flows from the wetland will discharge to the Groody River

The risk of contamination of any watercourses or groundwater is extremely low. There is no risk to human health within the meaning of the Directive.

6.1.2 Location of Proposed Development

Existing and Approved Landuse

The proposed development will result in the development of a site identified for residential development and the provision of student accommodation including delivery of a substantial public park. The proposed use on site is compatible with its landuse zoning objectives and policies setting out a framework for development on the site.

In zoning the land for development, the Planning Authority will have thoroughly assessed the nature of the site as part of the Strategic Environmental Assessment and Appropriate Assessment for the Limerick Development Plan to ascertain its capacity to accommodate such development. There are no apparent characteristics or elements of the design of the scheme that are likely to cause significant effects on the environment. The addition of this development is not considered to have a significant impact on the environmental sensitivities of the area.

The proposed development has taken the stated policy objectives in the Development Plan into consideration in advancing the development proposal.

Abundance, Quality and Regenerative Capacity of Natural Resources (including soil, land, water and biodiversity)

The nature of the proposed development is such that the natural resources used in its development are limited and there would be minimal ongoing use of natural resources from the proposed use of the site. The land may be categorised as urban development land, well serviced by infrastructure, public transport and community services. The objective is to maximise the development potential of the land in the interests of sustainable development and compact growth.

A NIS was prepared by Rissell Environmental and Sustainability Services Ltd which concluded that the project, individually or in combination with other plans or projects, will not affect the integrity of the European Sites (Lower River Shannon SAC and River Shannon and River Fergus Estuaries SPA).

An Ecological Impact Assessment (EcIA) was undertaken by Russell Environmental and Sustainability Services Ltd. There are no protected fauna or habitats on site and the habitat value is deemed negligible. The only location likely for bat roosts was the one mature White willow tree on the site, which will remain as part of the development, hence a bat survey was not carried out. is likely that bats may forage along the treeline adjacent to the drainage ditch and along the watercourse to access insects so bat sensitive lighting is proposed.

Although there is an inevitable reduction in the area of habitats as a result of the proposed development, the report concludes that the planned landscaping aims to improve the overall biodiversity by species rich habitat creation utilising native species planting and planting for pollinators and management of grassland with differential mowing. Therefore, the proposed development will provide an increase in biodiversity and net gain in the conservation value of the proposed habitats to be created, and there will be no net biodiversity loss as a result of the proposed development.

According to an examination of the information available on GeoHive, the site has bedrock geology of calcareous, basalts and other volcanic rocks. The GSI/Teagasc soils maps describe the soils as shallow well drained mineral (Mainly acidic) derived from mainly non-calcareous parent materials. The site and the surrounding area are mapped as having ‘High’ subsoil permeability; with areas to the east and west outside the site confines having ‘Moderate’ permeable soils. A large proportion of the site was previously filled with construction and demolition waste, mostly clay with stones and boulders but also containing waste from construction sites. The envisaged strategy for the site is of segregation and reuse where possible on site but disposal where required to licensed facilities.
No significant negative impacts are likely.

Absorption Capacity of Wetlands and Watercourses

There are no wetlands in the vicinity of the site.

Construction of the two headwalls on the proposed surface water system within the proposed wetland shall be carried out in close proximity to the River Groody. Prefabricated headwalls shall be used in order to minimise the use of materials that may cause polluting effects to the Groody River. The raised earthworks for the wetland will be constructed prior to the installation of the headwalls which will create

natural barrier for these works to take place within. An outfall from the wetland to the River Groody is also required. The outfall has been designed to have a minimal impact on the lands adjacent to the River Groody to avoid excessive earthworks and disturbance of the area. The outfall from the wetland will consist of an outfall flow control manhole adjacent to the wetland and a pipe network which will direct the water flow from the wetland to the watercourse. The outfall manhole shall be prefabricated to avoid construction works and concrete pours in the vicinity of the River Goody.

Extensive SuDs measures are proposed on site. Under the Water Framework Directive status assessment, the Groody River is of Moderate Status. The status of the water quality in the stream shall be maintained as discharge will be routed through nature based SuDs measures and a Klargester fuel/oil interceptor will ensure no deterioration quality of waterbodies..

The appointed contractor(s) will develop a Sediment Control Plan (SCP), which will form part of the CEMP in advance of any construction activities commencing. The SCP will remain in place until all permanent surface finishes have been completed to ensure that silt laden water cannot enter the existing drainage system without first being treated.

Whilst the proposed development will increase the loading to the Castletroy WWTP, the NIS Report confirms that the Castrltroy WWTP is currently operating within its organic capacity and compliant with the Emission Limit Values in its discharge licence. Further, a Confirmation of Feasibility has been received from Uisce Eireann.

There are no wetlands or watercourses llikely to be adversely impacted by the construction or operation of the proposed development.

Absorption Capacity of Coastal Zones

The site is not located proximate to a coastal zone. The site is located circa 500m from the Shannon Estuary, with the River Groody providing a potential pathway. The River Shannon and River Fergus Estuaries SPA is a short distance down river from where the River Groody connects with the River Shannon.

Absorption Capacity of Mountain and Forest Areas

The subject site is not located proximate to mountains or forested areas.

Absorption Capacity of Nature Reserves and Parks

No Nature Reserves or Parks will be affected by the proposed development.

Absorption Capacity of Nationally Designated Sites

There are no pNHAs within or in proximity to the subject site. There are no national monuments identified in or adjoining the site. No nationally designated sites will be affected by the proposed development.

Absorption Capacity of European Sites

A Natura Impact Statement has been prepared by Russell Environmental and Sustainability Services Ltd. The proposed development site is located outside the boundary of European Sites. No pathways for direct impacts as a result of the development on any of the QIs/SCIs of any European Site were

identified. Emissions to surface water were identified as a pathway for potential indirect effect on the Qualifying Interests of the Lower River Shannon SAC and River Shannon and River Fergus Estuaries SPA, including potential surface water pollution/particulate matter during construction and operation of the proposed development.

Mitigation measures to avoid the potential for any significant impacts via any of the pathways identified are detailed in the NIS and as a result the report concludes it can be excluded, on the basis of objective scientific information, that the project, individually or in combination with other plans or projects, will not affect the integrity of the European Sites (Lower River Shannon SAC and River Shannon and River Fergus Estuaries SPA).

Environmental Quality Standards

This relates to areas where there has already been a failure to meet the environmental quality standards laid down in legislation of the European Union and relevant to the project, or in which it is considered that there is such a failure. There are no known failures relating to environmental quality standards.

Whilst the status of the Groody River that runs to the immediate west of the proposed site is characterised as 'at risk' by the EPA in relation to its ecological status or potential, the proposed development has been designed and adequately mitigated to effectively minimise any potential risk to the river. The development itself is located circa 70m from the Groody River on land zoned for residential use. The only development proposed in proximity to the river is for surface water discharge as discussed previously. The status of the water quality in the River shall be maintained as discharge will be routed through nature based SuDs measures and a Klargester fuel/oil interceptor will ensure no deterioration quality of waterbodies.

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, Outline Construction Surface Water Management Plan, and Surface Water Management Plan.

Absorption Capacity of Densley Populated Areas

The intended residential use on the site is consistent also with the settlement strategy and several key housing policies and objectives set out in the Limerick Development Plan 2022 – 2028. The land is zoned for residential use.

The provision of 1,400 student beds will increase the population of the area on a temporary basis, primarily during term time, although the bedspaces shall be used for short term lets outside of that time. The site is ideally positioned proximate to the University of Limerick, public transport, Groody Neighbourhood Centre and other services and facilities. There is a significant need for student bedspaces as confirmed in the Student Need Demand Assessment Report. Whilst the development will increase the population, the site is well situated in terms of services such that the population can be absorbed.

No significant negative impacts are likely.

Absorption Capacity of Landscapes of Historical, Cultural or Archaeological Significance

The project does not include, encroach upon, or is situated within any designated landscape and/ or site of historical, cultural or archaeological significance or within any such setting that would cause effect to such areas that would require further assessment.

Kevin Fitzpatrick Landscape Architects prepared a Landscape Visual Impact Assessment with respect to the development proposal. The landscape is deemed to have low to medium. Sensitivity having regard to its zoning provisions in the development plan and surrounding built character. The visual sensitivity of receptors was also determined to be low to medium, with the view from the towpath along the River Shannon (VR14) the only highly sensitive viewpoint. However, only very small glimpsed views of the very upper levels of the buildings will be possible from this view. The impact will therefore be imperceptible.

Overall, the initial change to the landscape that includes built development may be perceived negatively by some people, however due to the surrounding urban and suburban environment this would be considered a continuation of existing and emerging trends in the area. With this considered the impact would be moderate insignificant and long term in duration.

6.1.3 Characteristics of Potential Impacts

Magnitude and Spatial Extent of Potential Impact

With a net developable area of 1.88 hectares on a gross site of 3.41 hectares the proposed development is suitable in scale and size to its location, incorporating a substantial public park and landscaped areas. Development at this location is responsive to the zoning on the land and the proximity of the site to the University of Limerick, where a significant demand exists for student housing..

The spatial extent of effects are limited and in compliance with recommended standards such that would not give rise to a requirement for further assessment.

Nature of the Impact

Any potential impacts associated with the construction phase of the development will be temporary and characteristic of a typical urban development project. The proposed development will cause permanent visual changes to the landscape, but this change will reflect new and ongoing development projects in the wider area. The proposed development will assist in providing a greater number of residential units and will contribute positively towards addressing the national critical shortage in housing supply.

Impacts such as noise, dust and/or potential water pollution during the construction phase will be temporary and reversible through the correct implementation of the appropriate control measures

Transboundary Nature of the Impact

The proposed development does not give rise to potential for transboundary effects, that is effects beyond the operational area of the Local Authority.

Consideration of potential effects under specific environmental topics

Population & Human Health

Construction

Potential slight, short term term, temporal negative impact to local residents during works phase, arising from traffic, noise and dust albeit temporary in nature. The only residential area likely to be potentially impacted from construction works are those residents living in Curragh Birin. However, they are separated from the development site by the Groody Road, so it is likely any potential impacts will be slight, short term, and temporal negative in nature. Compliance with the CEMP will mitigate any significant impacts arising.

Operation

The operational impact of the development will be positive, providing for much needed student housing and affording diversity of tenure to existing and future populations. The public realm and provision of active recreational space will be significantly enhanced resulting in positive impacts to the immediate and surrounding urban area. Whilst the population in the area will intensify, the site and proposed development is within walking distance of all services and facilities and further is well connected by public transport with a bus stop neighboring the site and the train station some 1.5km away in the town centre.

A Daylight & Sunlight Assessment by 3D Design Bureau assessed the impact of the development on the Vertical Sky Component (VSC) & Annual/Winter Probable Sunlight Hours. The effect on VSC has been assessed for 28 no. windows/rooms across the surrounding properties along 6-11 Curragh Birin. Five ground floor windows of the properties along 6 -9 Currgah Birin have a minor adverse impact[5] as a result of the development. Given the scale of the proposed development and the fact that 'minor adverse' impacts occurred only in instances where obstructions were already present in the baseline state, 3DDB are of the opinion that these impacts should be deemed acceptable.

The effect on the APSH of 26 no. windows would be considered 'negligible', and 2 no. 'minor adverse'. The effect on the WPSH of 25 no. of these windows would be considered 'negligible', 1 no. 'minor adverse', and 1 no. 'moderate adverse'. The 2 no. windows adversely affected in terms of both APSH and WPSH are windows 6a and 7b. Both experience a 'minor adverse' level of effect in the annual calculation, while in the winter calculation, window 7b is subject to a 'moderate adverse' level of effect. It should be noted that window 7b has a WPSH baseline value of 2.45%, which is significantly below the minimum 5% recommended by the BRE Guidelines. Consequently, although the reduction recorded is only 1.07%, this represents nearly a half reduction compared to the original value, resulting in an exaggerated level of effect. Following the above considerations, It is opinion of 3DDB that these impact should be deemed acceptable.

Biodiversity

Construction

The site has been subjected to human intervention with ground compaction in the past and deposition of fill material. The proposed development will result in the removal of the natural re-growth that has occurred on site and the biodiversity therein. The EcIA concludes that the landscaping scheme for the

[5] *A 'Minor Adverse' level of effect will be stated if the level of effect is marginally outside of the criteria as stated in the BRE Guidelines. Typically a 'Minor Adverse' level of effect will be applied if the level of daylight or sunlight is reduced to equal or greater than 80% and less than 100% of the applied target value.*

proposed development includes a number of measures that will enhance (either directly or indirectly) the biodiversity of the site, including a wetland habitat area / swales and native flowers. These measures will introduce a number of habitats that are not currently present at the site, resulting in a slight biodiversity net gain.

Short-term negative impacts may arise due to noise and dust disturbance on biodiversity, but these are predicted to be not significant and temporary in nature having regard to the provision of mitigation measures in the CEMP and the non sensitive nature of the site from a biodiversity perspective.

Operation

The proposed public realm and landscaping plan is likely to enhance biodiversity in the area over and above what exists at present. A 10m buffer has been maintained from the Groody River such that no walkways or public access is provided.

The operational stage is likely to have positive long term impacts. No significant negative impacts are likely to arise from the operational stage.

Land & Soils

Construction

The project will involve a direct effect to, and loss of land and soils. However, this is necessary to give effect to the planned spatial development of the city. A large proportion of the site has previously been filled with construction and demolition waste, mostly clay with stones and boulders but also containing waste associated with being from construction sites. The envisaged strategy for the site is to remediate the land through segregation and reuse where possible on site but disposal where required to licensed facilities.

Soil will be excavated to facilitate foundations for houses and roads. No extraordinary excavation will occur. Excavated soil will be reused for landscaping insofar as possible. The construction phase shall be monitored in relation to:

- Prevention of oil and diesel spillages;
- Adequate runoff control of potential stockpiles of contaminated subsoil;
- Cleanliness of the adjoining road network.

Mitigation measures are detailed in Section 3 of the CEMP. Significant impacts are not anticipated.

Operation

No likely significant negative impacts are likely to arise from the operational stage.

Water & Hydrogeology

Construction

Groundwater vulnerability at the site location is classified as high under GSI mapping. It is anticipated that the development site works and excavation proposals will not be deep enough to intersect the underlying aquifer during the construction phase. There are significant mitigation measures detailed in Section 3.1.1.2 of the CEMP in relation to management of groundwater contamination. The impact on the regional groundwater body is considered to be imperceptible.

The appointed contractor(s) will develop a Sediment Control Plan (SCP), which will form part of the CEMP in advance of any construction activities commencing. The SCP will remain in place until all permanent surface finishes have been completed to ensure that silt laden water cannot enter the existing drainage system without first being treated.

The proposed waste compound area, site compound area and site carpark will be located at a significant distance from the Groody River and any areas which could potentially be impacted by flooding.

It has been noted already in this report that the site is filled with C&D waste. The primary filled material is clay with stone and boulders, however there is some limited material present such as steel, insulation, aluminium, etc. It is possible that the ground water percolating through this material may be contaminated and that this contaminated water is flowing to the River Groody. The proposed development seeks to remove unsuitable material thereby reducing the risk of ground water contamination occurring.

Operation

Extensive SuDs measures are proposed on site. Under the Water Framework Directive status assessment, the Groody River is of Moderate Status. The status of the water quality in the stream shall be maintained as discharge will be routed through nature based SuDs measures and a Klargester fuel/oil interceptor will ensure no deterioration quality of waterbodies.

The site layout has been produced in such a way that the construction footprint will be located outside any Flood Zones A or B. Therefore, the development as proposed is not predicted to result in an adverse impact to the existing hydrological regime of the area or increase flood risk elsewhere and is therefore considered to be appropriate from a flood risk perspective.

Air & Climate

Traynor Environmental prepared an Air Quality and Climate Impact Assessment and the report accompanies the development proposal. The report confirms that the proposals have the potential to cause air quality impacts as a result of fugitive dust emissions during construction and road traffic exhaust emissions associated with vehicles travelling to and from the site during operation.

Construction

During the construction phase of the development there is the potential for air quality impacts as a result of fugitive dust emissions from the site. These were assessed in accordance with the general assessment methodology. Assuming good practice dust control measures are implemented, the residual significance of potential air quality impacts from dust generated by earthworks, construction activities was predicted to be slight - imperceptible.

Operation

Potential impacts during the operational phase of the proposals may occur due to road traffic exhaust emissions associated with vehicles travelling to and from the site and the development itself. Review of published 2023 EPA air quality data for the Zone C area and site-specific monitoring data was therefore undertaken in order to predict pollutant concentrations at sensitive locations as a result of emissions from the development. Review of the operational phase was predicted to be imperceptible.

It is not predicted that significant impacts to climate will occur during the operation stage due to the nature and scale of the development and the substantially reduced car parking provision on site. Potential significant impacts are considered to be unlikely.

Noise & Vibration

Traynor Environmental undertook an Acoustic Assessment of the development proposal and accompanies the proposal.

Construction

During the construction phase noise is predicted while works are taking place in proximity to the nearest Noise Sensitive locations. The calculated noise levels associated with the various stages of construction are in the range of 51 to 56dB LAeq,1hr. , well below the construction noise criterion of 65dB. In addition, it should be noted that, in order to assess a worst- case scenario, a large proportion of the daily vehicle numbers were assumed to arrive/depart over an hour long period. The existing daytime noise environment is dominated by road traffic and the noise generated by construction traffic is not expected to change the character of the existing noise environment significantly. Therefore, any impact is expected to be neutral and imperceptible.

Operation

In terms of noise sources associated with the operation of the development there will be some level of additional associated traffic. Most mechanical plant is located at ground floor level within the buildings but there will be some operating on a 24/7 basis. The roof plant shall operate within 60dB s(sound power) as a18dB reduction acoustic louvres to the perimeter of the external mechanical services plant is provided. There are no significant sources of vibration associated with the operational phase are expected. The R445 and Groody Road to the north and east boundary of the site is the dominant noise on the proposed site. The assessment has reviewed details of the road noise and has recommended that a 2.5m high soil berms is to be installed between the site and roads. Any impact is expected to be neutral and imperceptible.

Landscape

There are no protected or designated sites in or within the vicinity of the site, including landscape designations. With the exception of existing residential amenity, there are no features of specific townscape or visual sensitivity or identified significance on the site or its immediate surrounds. The existing environment can therefore be described to be of medium to low sensitivity.

Construction

The proposed development will result in a medium to high degree of change - greatest during the construction phase, when some negative visual impact typical of construction activity is inevitable but temporary and short-term in nature. It is considered that the impact of the proposed development during construction on the townscape and visual environment will be moderate, negative and short-term during the construction phase. Significant adverse and long terms impacts are not anticipated.

Operation

At 5 - 8 storeys, the proposed development is notably higher than its immediate traditional suburban context, with the exception of the existing Travel Lodge Hotel which sits at 8 storeys just to the west of

the application site. Accordingly, it is considered that the height of the proposed development will not be incongruous in the area.

The nature, use and scale of the proposed development is considered to be in accordance with national and local policy and good practice guidance. The site is promoted in the Development Plan as being capable of accommodating a tall building. It is therefore considered that the development is consistent with existing and emerging trends for development of existing underutilised, suitably well-located serviced lands.

Post construction, the proposed development will increasingly be viewed as part of the baseline environment with a corresponding acceptance of its presence and with an associated reduction of any adverse visual impact. It is considered that the proposed development will give rise to a slight, moderate, neutral and long-term impact during the operational phase.

Therefore, in consideration of the above, the proposed development will not have a significant adverse long term permanent impact on the landscape or visual amenity in the area

Material Assets

Resources that are valued and that are intrinsic to specific places are called 'material assets'. This section considers physical resources in the environment which may be of human origin, as those of a natural origin have already been addressed in previous sections. Built services and infrastructure along with traffic is considered because in effect traffic consumes roads.

Construction

There could be potential temporary impacts to residences in the vicinity of the site during the construction period, but such impacts will be controlled and managed by the site contractor, in accordance with an agreed CEMP. A Traffic Management Plan (TMP) will be prepared for the site works. Access for construction of the development will be from the Groody Road via the main access to the development. The construction shift times will ensure any staff travelling to the site by car will have limited impact on the peak periods of 08:00 - 09:00 in the morning and 17:00 - 18:00 in the evening as it is envisaged most construction staff will arrive to work before 08:00 in the morning and leave after 18:00 in the evening.

Site welfare facilities will be connected to the foul sewerage system with discharge to the Castletroy Treatment Plant which has adequate capacity. Significant adverse and long terms impacts are not anticipated.

Operation

The site is well positioned adjoining existing services and facilities, in proximity to public bus transport. The Traffic Assessment confirms there is adequate capacity in the public bus system to accommodate additional passengers. Given the nature of development, it is anticipated that most students will walk the 1km distance to the University of Limerick. Whilst the occupation of 1,400 student bedspaces is likely to result in a significant increase in population in the area during term time, the possibility of significant long terms effects to intrinsic local resources of value of the location are not anticipated during operation phases. The subject site and the local neighbourhood are considered sufficiently serviced by utilities and local services, including on site supporting services to accommodate

requirements arising from the students. Significantly, the development proposal provides a significant public park for the benefit of future tenants and the public at large.

A pre-connection enquiry was lodged with Irish Water for the development outlining the proposed flows and loads which would be generated by the development. This application was undertaken to determine if there is adequate capacity in the existing public foul sewer network to cater for this development. The Irish Water reference W0657-Report-002 Page 14 of 20 number for the application is CDS24007270. A confirmation of feasibility has not been received yet for this application, but it is not anticipated that there will be any capacity restrictions following receipt of the masterplan confirmation of feasibility.

It is not anticipated that the proposed development shall require such quantities of these material assets which are sufficient to result in significant impacts on the surrounding environment. No likely significant negative impacts are likely to arise from the operational stage

Cultural Heritage

There are no national monuments identified in or adjoining the site. A Desktop Archaeological Assessment has been prepared by John Cronin & Associates which accompanies this planning application. The report concludes that portions of the field to be developed shows evidence of ground disturbance likely caused by previous developments in the recent past. None of the recorded archaeological sites within 1km study area are located within the subject site and no visual evidence of previously unrecorded archaeological heritage was noted.

There will be no predicted impact from the proposed development on the known archaeological environment. Taking into account the aforementioned portions of ground disturbances, it is considered that the proposed development possesses a low to medium archaeological potential, however, the possibility for previously unrecorded subsurface archaeological features still remains within the less disturbed areas. As such, it is possible that that the construction phase of the proposed development may impose a direct impact on unknown subsurface archaeological features. The subject site is considered to possess a low to medium archaeological potential, and a programme of test trenching within the viable portions of the site is recommended in advance of any site development works.

Interactions

There may be interaction between different environmental topics such as between the water environment and ecology and between ecology and landscape. However, no significant impacts due to interactions are anticipated given that a suite of best practice works measures have been incorporated into the project in accordance with the principles set out in the CEMP.

When considering interactions, the assessor has been vigilant in assessing pathways – direct and indirect-that can magnify effects through the interaction. In practice many impacts have slight or subtle interactions with other disciplines. However, it is concluded that most interrelationships are neutral in impact when appropriate control measures are incorporated into the operation of the proposed development.

Probability of the Impact

No significant environmental impacts are predicted for the proposed development. Implementation of the CEMP by the contractor, will ensure that all applicable environmental health and safety regulation

is complied with throughout the Construction Phase thereby ensuring that this phase will not result in significant effects on human health or the environment.

During the Construction Phase noise is predicted while works are taking place in proximity to the nearest Noise Sensitive Locations (NSLs). Mitigation measures have been recommended and are outlined in the Acoustic Design Statement so that any negative impact may be reduced. It is not expected that a negative impact will occur on existing noise sensitive locations.

The Operational Phase of the proposed development will result in an increase in the population of the area, and it will have a positive impact on the long-term supply needs of accommodation in the surrounding area.

Duration, Frequency & Reversibility of the Impact

Any potential impacts associated with the construction phase of the development will be temporary and characteristic of a typical urban development project. The proposed development will cause permanent visual changes to the landscape, but this change will reflect new and ongoing development projects in the wider area. The proposed development will assist in providing a greater number of student bedspaces and will contribute positively towards addressing the national critical shortage in housing supply.

Impacts such as noise and dust during the construction phase will be temporary and reversible through the correct implementation of the appropriate control measures. Any potential impacts associated with the development will be temporary given the seven year duration of the development proposal.

Screening Considerations							
Aspect	Phase	Potential Effect	Extent	Probability	Significance of Effect	Quality of Effect	Duration
Landscape	C	Loss of natural landscape– loss mitigated with landscaping design	Local	Likely	Moderate	Negative	Permanent
	O	Planting selection comprises mix of various species to ensure appropriate character for the area and enhance landscape at the subject lands	Local	Likely	Not significant	Positive	Permanent
Visual	C	Perceived negative changes due to emergence of plant and machinery and site clearance works	Local	Likely	Moderate	Negative	Short Term
	O	Changes to existing character of site with residential development	Local	Likely	Not significant	Positive	Permanent
Biodiversity	C	Loss of natural land and natural re-growth– loss mitigated with landscaping design	Local	Likely	Not significant	Negative	Permanent
	O	Planting selection comprises mix of various species and provision of measures to enhance natural habitats and biodiversity	Local	Likely	Not significant	Positive	Permanent
Land & Soil	C	Loss of subsoil from site Potential contamination due to accidental spillage	Local	Likely Not Likely	Not significant Not significant	Negative Neutral	Permanent Brief
	O	None Predicted	-	-	-	-	--
Human Health	C	None Predicted	-	-	-	-	
	O	None Predicted	-	-	-	-	-
Water	C	Accidental pollution events occurring to groundwater and Groody River	Local	Not Likely	Not significant	Neutral	Brief - Temporary
	O	Discharge of treated attenuated surface water to existing surface water network Discharge of foul and waste water to existing waste water network	Local	Likely	Not significant	Neutral	Permanent
Air Quality & Climate	C	Reduction of air quality as a result of construction traffic and HGVs, and emissions from construction and plant machinery	Local	Likely	Not Significant	Neutral	Permanent
	O	None predicted	-	-	-	-	-
Noise	C	Increase in noise as a result of construction activity, and operation of plant and machinery.	Local	Likely	Not significant	Negative	Temporary
	O	Increase in noise level as a result of vehicular movements in and out of residential development	Local	Likely	Not significant	Neutral	Permanent
Cultural Heritage: Built Heritage	C	None predicted	-	-	-	-	-
	O	None predicted	-	-	-	-	-

Cultural Heritage: Archaeology	C	Potential unknown subsurface archaeological remains	Local	Likely	Not significant	Neutral	Permanent
	O	None Predicted	-	-	-	--	-

6.1.4 Schedule 7A information

1. 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
Refer to Section 3.1 and 6.1.1 of this report.

(b) a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.
Refer to Section 2.0 and 6.1.2 of this report.

2. A description of the aspects of the environment likely to be significantly affected by the proposed development.
Refer to Section 6.1.3 of this report.

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,
Significant effects to the environment will be mitigated through adherence to best practice protocols and regulations in the construction phase of the project. Waste and emissions arising during the operational phase are not considered to be significant within the meaning of the Directive.

(a) the use of natural resources, in particular soil, land, water and biodiversity.
Refer to 6.1.1. of this report.

4. The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7.
Please refer to section 6.1.1 of this report.

6.2 Available Results under Other EU Environmental Legislation

Other relevant EU environmental legislation may include:

- SEA Directive [2001/42/EC]
- Birds and Habitats Directives [79/409/EEC, 2009/147/EC & 92/43/EEC]
- Water Framework Directive [2000/60/EC]
- Ambient Air Quality Directive and Heavy Metals in the Ambient Air Directive
- Industrial Emissions Directive
- Seveso Directive
- Trans-European Networks in Transport, Energy and Telecommunication
- EU Floods Directive 2007/60/EC

Directive	Results
SEA Directive [2001/42/EC]	The proposed development is compatible with the policy objectives of the Limerick Development Plan 2022 – 2028 which has been subject to Strategic Environmental Assessment.
Birds and Habitats Directives [79/409/EEC, 2009/147/EC & 92/43/EEC]	An Appropriate Assessment (AA) screening report and Natura Impact Assessment prepared by REES accompanies this planning application. The AA screening report concludes that: "Mitigation measures to avoid the potential for any significant impacts via any of the pathways identified are detailed in the NIS and as a result the report concludes it can be excluded, on the basis of objective scientific information, that the project, individually or in combination with other plans or projects, will not affect the integrity of the European Sites (Lower River Shannon SAC and River Shannon and River Fergus Estuaries SPA)".
Water Framework Directive [2000/60/EC]	Foul water will discharge to the public sewer and wastewater treatment plant. With the exception of the provision of drainage infrastructure and pathways within the proposed public park, no construction shall take place within 60m of the Groody River. Extensive SuDs measures are proposed on site. Under the Water Framework Directive status assessment, the Groody River is of Moderate Status. The status of the water quality in the stream shall be maintained as discharge will be routed through nature based SuDs measures and a Klargester fuel/oil interceptor will ensure no deterioration quality of waterbodies.
Marine Strategy Framework Directive	The site is located inland, away from the coast. There is no likely impact given the distance.
Ambient Air Quality Directive and Heavy Metals in the Ambient Air Directive	Not relevant to the proposed development
Industrial Emissions Directive	Not relevant to the proposed development
Seveso Directive	There are no Seveso sites in the vicinity
Trans-European Networks in Transport, Energy and Telecommunication	Not relevant to the proposed development
EU Floods Directive 2007/60/EC	The site layout has been produced in such a way that the construction footprint will be located outside any Flood Zones A or B. Therefore, the development as proposed is not predicted to result in an adverse impact to the existing hydrological regime of the area or increase flood risk elsewhere and is therefore considered to be appropriate from a flood risk perspective.

7.0 SCREENING CONCLUSION

Having regard to the nature and scale of the proposed development which is below the thresholds set out in Class 10 of Part 2 of Schedule 5, the criteria in Schedule 7, the information provided in accordance with Schedule 7A of the Planning and Development Regulations 2001, as amended, and the following::

- The scale, nature and location of the proposed development
- The potential impacts and proposed mitigation measures; and
- The results of the any other relevant assessments of the effects on the environment

It is considered that the proposed development would not be likely to have significant effects on the environment and it is concluded that an environmental impact assessment report is not required.