

Proposed Integrated Constructed Wetland at
Kilnamanagh, South County Dublin
(DURL_Project #Life17 ENV/IE/000281)

Preliminary Examination (for the purposes of EIA) in accordance
with Article 120 of Planning and Development Regulations 2001-
2019



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**Built.
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Strategic
Assessment
**Built
Environment**

Client:

DURL Project SDCC

Date:

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1 Introduction

1.1 Background

The Dublin Urban Rivers LIFE (DURL) project, a collaboration between South Dublin County Council and Dún Laoghaire-Rathdown County Council, seeks to improve water quality in County Dublin and promote water quality improvement in urban areas in Ireland and across Europe. Domestic misconnections, caused by incorrectly plumbed washing machines and dishwashers discharging to the rainwater drainage network, cause water pollution and reduce the habitat value of rivers and streams. This hinders Ireland's ability to meet the requirements of the Water Framework Directive and the River Basin Management Plan for Ireland 2018-2021. As part of the response to this challenge it is proposed to build integrated constructed wetlands (ICW) at several strategic locations in South County Dublin. South Dublin County Council is the lead authority on the project.

SDCC proposes to develop a total of five ICWs at four sites in the county:

- **Kilnamanagh:** A single site adjacent to a canalised stream – a tributary to the River Camac;
- **Griffeen Valley Park, Lucan:** A single site adjacent to the River Griffeen;
- **Dodder Valley Park:** Two sites within the park (DR033 and DR035), adjacent to the River Dodder, approximately 400m from each other;
- **Tymon Park/Poddle:** a single site within the existing park.

As part of the current project, the proposed ICWs at Kilnamanagh, Griffeen Valley Park and Dodder Valley Park (four separate ICWs in total) are being assessed.

The purpose of the ICWs is to provide an element of treatment for potentially contaminated surface water that currently flows into watercourses in the county (the Camac, the Griffeen and the Dodder). It is intended that the ICWs will have several benefits – while water treatment is a priority, the ICWs are also expected to enhance local biodiversity and the amenity value of each site.

Given these objectives it is essential that each ICW proposal is subject to an appropriate level of biodiversity survey and environmental appraisal.

The DURL Project (Agreement number: LIFE17 ENV/IE/000281) has received funding from the European Union.

This report reflects only the author's view and the Executive Agency for Small and Medium-sized Enterprises is not responsible for any use that may be made of the information it contains.

1.2 The current project

As part of the overall project South Dublin County Council (SDCC) is seeking permission under Part 8¹ of the Planning and Development Regulations 2001-

¹ Provisions with respect to certain development by or on behalf of local authorities

2019 (hereafter PDR 2001) for the development of the proposed ICW at Kilnamanagh.

Brady Shipman Martin was appointed by SDCC to prepare a Preliminary Examination of, at least, the nature, size or location of the proposed ICW development at Kilnamanagh, in relation to the requirement, or not, for Environmental Impact Assessment (EIA). This is in accordance with article 120² of the PDR 2001, and the purpose is to allow the planning authority to make a conclusion, based on such preliminary examination, that –

- (i) there is no real likelihood of significant effects on the environment arising from the proposed development, the authority shall conclude that an EIA is not required,
- (ii) there is significant and realistic doubt in regard to the likelihood of significant effects on the environment arising from the proposed development, it shall prepare, or cause to be prepared, the information specified in Schedule 7A for the purposes of a screening determination, or
- (iii) there is a real likelihood of significant effects on the environment arising from the proposed development, it shall—
 - (I) conclude that the development would be likely to have such effects, and
 - (II) prepare, or cause to be prepared, an EIAR in respect of the development.

This report is a Preliminary Examination of the proposed development prepared on behalf of SDCC by Matthew Hague BSc MSc Ad. Dip. Planning & Environmental Law CEnv MCIEEM MIELA, Senior Ecologist with Brady Shipman Martin. Matthew has over 18 years' experience in ecological and environmental consultancy.

Technical review was by Thomas Burns, (BAgrSc. (Landscape); Dip. EIA Management; Ad. Dip. Planning & Environmental Law) MIELA, Partner with Brady Shipman Martin, environmental, landscape and planning consultants. Thomas has over 25 years' experience in the area of Environmental Assessment.

The application for Part 8 permission for the proposed ICW development is accompanied by a Report for the purposes of Appropriate Assessment (AA) Screening prepared by Brady Shipman Martin, an Archaeological and Cultural Heritage Impact Assessment Report prepared by Gort Archaeology, an Ecological Baseline Report prepared by Roughan & O'Donovan Consulting Engineers, a Soil Analysis Report prepared by IGSL, as well as the project design details prepared by SDCC.

These documents also accompany the application.

² Sub-threshold EIAR

2 Environmental Impact Assessment

2.1 Background and Applicable Legislation

EIA requirements derive from Council Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment. The Directive and its amendments were subsequently codified and replaced by Directive 2011/92/EU, as amended in turn by Directive 2014/52/EU³. This amending Directive was transposed into national planning consent procedures in September 2018 through the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018).

The objective of EIA is to ensure a high level of protection of the environment and human health, through the establishment of minimum requirements for environmental impact assessment prior to development consent being given, for public and private developments that are likely to have significant effects on the environment.

2.2 Mandatory Requirement for EIA

EIA is mandatory for certain types of projects as set out in Annex 1 of the EIA Directive (and Part 1 of Schedule 5 of the PDR 2001). EIA is also mandatory for other projects that meet or exceed a stated threshold as set out in Annex II of the Directive (and Part 2 of Schedule 5 of the PDR 2001).

The proposed development does not correspond to a class of development set out in Annex 1 (or Part 1 of Schedule 5 of the PDR 2001) for which EIA would be a mandatory requirement.

As a project designed to hold water it may be considered as a class of development falling within Class 10(g) of Part 2 of Schedule 5 of the PDR 2001:

10 Infrastructure Projects

(g) Dams and other installations not included in Part 1 of this Schedule which are designed to hold water or store it on a long-term basis, where the new or extended area of water impounded would be 30 hectares or more.

However, at a maximum area of c.1.3hectares (construction stage), the proposed development does not meet or exceed any threshold stated in Annex 2 (or Part 2 of Schedule 5 of the PDR 2001) for which EIA would be a mandatory requirement.

³ Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment

2.3 Requirement for 'Sub-threshold' EIA

Certain developments by planning authorities prescribed under Section 179⁴ of the Planning and Development Act 2000-2019 (hereafter the PDA 2000) that are not listed in Part 1 of Schedule 5 and that do not meet or exceed a stated threshold for EIA of a class of development listed in Part 2 of Schedule 5 (i.e. where requirement for EIA is not mandatory) are subject to a Preliminary Examination in accordance with article 120 of the PDR 2001 for the requirement, or not, for '*sub-threshold*' EIA.

The Preliminary Examination must consider, at least, the nature, size or location of the proposed development.

The report has had regard to the requirements of Schedule 7 of the PDR 2001 in preparing this Preliminary Examination.

3 The Proposed Development

The proposed ICW at Kilnamanagh will improve water quality through the treatment of storm water contaminated with misconnections from domestic dwellings which currently discharge directly into the watercourse. At this location it is proposed to provide a single cell ICW. The proposed development site location is shown in **Figure 1**.

⁴ Local authority own development

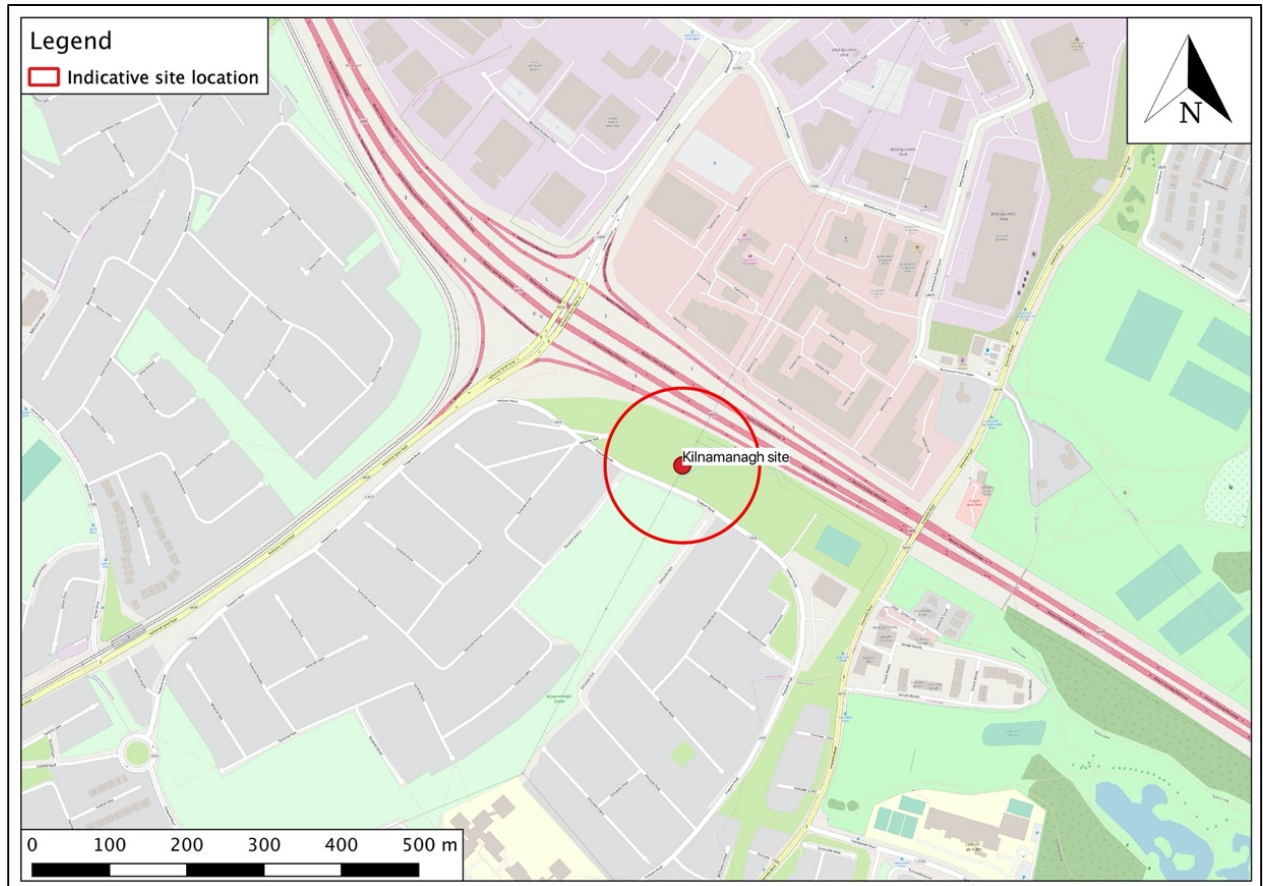


Figure 1 Location of proposed development site (refer to accompanying documentation for full details)

4 Preliminary Examination of the Proposed Development

The Preliminary Examination considers, at least, the nature, size and location of the proposed development and the requirements of Schedule 7 of the PDR 2001.

4.1 The nature of the Proposed Development

4.1.1 The Proposed Development

The proposed single cell ICW development consists of the following:

- Temporary Access Works;
- New Surface Water manhole and flow controller with a 100 to 150mm diameter PVC pipe to the ICW. This will involve the provision of c.32m of pipework in total; with c.16m to the ICW from a new chamber, and c.16m from the ICW to discharge back to the existing stream;
- The development of the ICW will require excavation up to 2.4m deep. Spoil arising will be either removed from site or reused locally to raise the level of the surrounding green area by up to 700mm;
- The total ICW works area will be c.13,000m² (during construction);
- The ICW will be a single cell, 2 to 2.4m deep, with a total area of c.1980m², and a treatment area of c.1560m²;
- The slope of the ICW banks will be 1:1 and the area will therefore be fenced;
- Following construction of the ICW any temporary works/access areas will be reinstated.

The proposed site layout is illustrated on Figure 2.

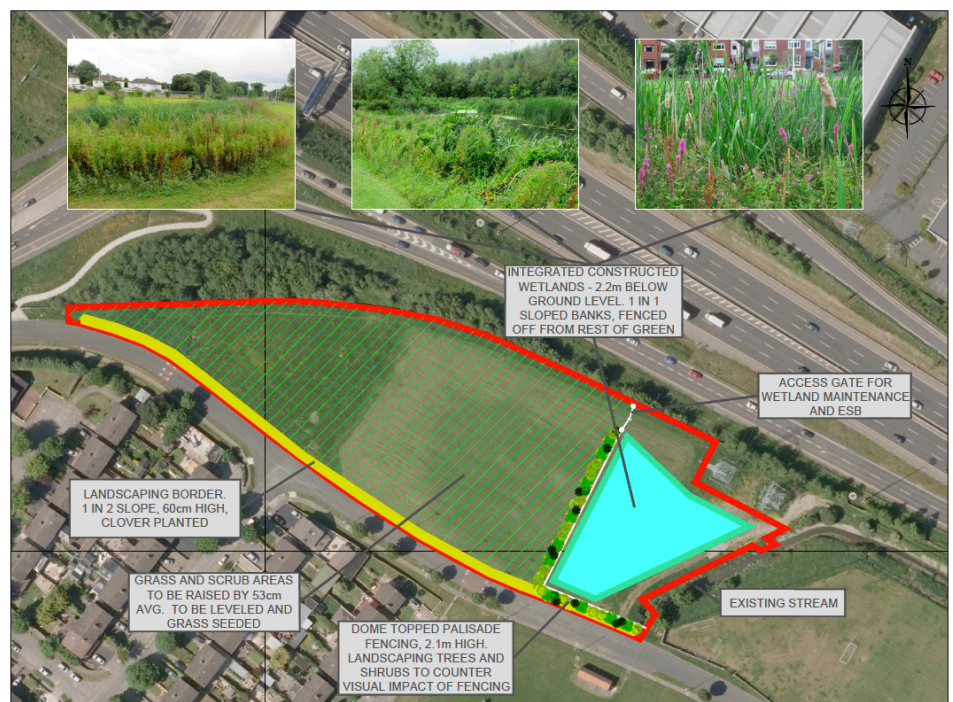


Figure 2 Proposed Site Plan

4.1.2 Appropriate Assessment

A report for the purposes of Appropriate Assessment (AA) Screening has been prepared by Brady Shipman Martin and accompanies the planning application. The Report notes that significant effects on any European sites as a result of the proposed development have been ruled out, and potential significant effects on European sites have been excluded at a preliminary screening stage.

The assessment concludes that:

Following review of the characteristics of the proposed ICW development against the Conservation Objectives of the relevant European sites, it is concluded that there is no possibility that the proposed development could result in any likely significant effects on European sites on its own or in combination with other plans and projects. This assessment was reached without considering or taking into account mitigation measures or measures intended to avoid or reduce any impact on European sites.

In view of best scientific knowledge therefore, this report concludes that the proposed ICW development at Kilnamanagh, individually or in combination with another plan or project, is not likely to have a significant effect on European sites under Article 6 of the Habitats Directive (92/43/EEC) in light of their conservation objectives. The proposed development does not require Appropriate Assessment.

4.1.3 Archaeological and Cultural Heritage Impact Assessment

The assessment undertaken by Gort Archaeology has shown that there are no known archaeological monuments within the footprint or 100m buffer around the proposed ICW. No archaeological excavations have taken place within the footprint or 100m buffer around the proposed ICW. No known archaeological objects are securely provenanced to within the footprint of the proposed ICW.

The available aerial photographs do not show any identifiable archaeological features within the footprint or 100m buffer around the proposed ICW. The walk-over visual site inspection did not reveal any surface expressions of features of archaeological significance, but it must be borne in mind that the northern portion of the site was heavily overgrown leading to poor surface visibility at the time of the site inspection.

The cartographic sources show the site of the proposed ICW as open land, subsequently being enclosed as agricultural land. The Ordnance Survey maps indicate the curving line of the probable ecclesiastical enclosure of the monastery, the line of which is located 180m from the perimeter of the proposed ICW, the vast majority of which was presumably removed or truncated by the present housing estate.

The results of the archaeological excavations parallel to the line of the M50 Motorway and Luas line have shown the extent of surviving sub-surface

archaeology associated with Ballymount Demesne c. 1km to the north west of this site in Kilnamanagh. The excavation in advance of the Luas line construction (01E0666) identified that the construction works associated with earlier M50 construction had truncated medieval and post-medieval archaeological features prior to the archaeological excavation for the Luas Line in 2001.

The presence of the ecclesiastical enclosure and monastery at Kilnamanagh and the subsequent construction of a tower house and bawn on the earlier grounds of the monastery indicates that the general area was a focus of activity from the early medieval period onwards. There is potential for archaeological features and remains associated with activities related to the monastery and the subsequent tower house to survive at sub-surface level. If there are any archaeological features located within the site of the proposed ICW, they may have been truncated by earlier works associated with the M50, due to the proximity of same, but if present, may survive in a truncated condition.

4.1.4 Biodiversity Assessment

As confirmed in the Ecological Baseline Report prepared by Roughan and O'Donovan, this proposed ICW location is dominated by improved grasslands and/or managed habitat features which can be classified as being of low ecological value. There were no species listed in the FPO nor any invasive species or rare/protected faunal species found within the footprint of this proposed ICW site. There will be no impacts on biodiversity as a result of the proposed ICW development.

4.2 The Size of the Proposed Development

As noted in Section 4.1.1 the construction area of the proposed ICW will be c.13,000m², with a final area on completion of c.1,980m², including a treatment area of c.1,560m².

The development is small in scale and the existing site is suitable for the proposed ICW development, which will be located in triangle of land, c.45m across at its widest point, under a high voltage power line and transmission tower. To the west/north of this triangle is an area of managed grassland used as an amenity area.

4.3 The Location of the Proposed Development

The site proposed for the constructed wetland at Kilnamanagh is located immediately outside (to the south) of the M50 with the R838 Katharine Tynan Road to the west and the R819 Greenhills Road to the east. The Elmcastle Park residential development is on the southern site boundary.

The site is located in the Liffey sub-catchment of the Liffey and Dublin Bay catchment. In the southern/eastern part of the site is a stream⁵, effectively canalised, that eventually discharges to the River Camac, c.2.2km to the north east, via the Robinhood Stream. The area under assessment is one of the few places along its length where this stream is not culverted. The stream is located in an unmanaged triangle of land, c.45m across at its widest point, under a high voltage power line and transmission tower. To the west/north of this triangle is an area of managed grassland used as an amenity area.

4.3.1 South Dublin County Development Plan 2016-2022

The site is located within land zoned OS (Open Space – To preserve and provide for open space and recreational amenities) in the County Development Plan (see Figure 3 – extract from Sheet 5 of the South Dublin County Development Plan).

There are no protected prospects or significant views pertaining to the Site (refer to Figure 3) and similarly the site contains no features listed on either the Record of Monuments and Places or the Record of Protected Structures. There are no trees subject to Tree Protection Orders or objectives. There is a Geological Site for Protection to the south, this area will not be affected in any way by the proposed ICW development.

The Site is not located within or adjacent to an area identified as being susceptible to flooding and in any case the proposed development is not of a type listed as vulnerable in the context of the OPW Guidelines for Planning Authorities⁶: *The Planning System and Flood Risk Management*. It is considered to be ‘water-compatible development’ and the Justification Test would not be required.

The Site is not located within or adjacent to any site designated for nature conservation, such as a European site or Natural Heritage Area or proposed Natural Heritage Area (NHA or pNHA).

The proposed ICW development aligns fully with the policies and objectives of the Plan in relation to Infrastructure and Environmental Quality, Green Infrastructure and Heritage, Conservation and Landscapes.

⁵ <https://gis.epa.ie/EPAMaps/>

⁶ <https://www.opr.ie/wp-content/uploads/2019/08/2009-Planning-System-Flood-Risk-Mgmt-1.pdf>



Figure 3: Extract from Sheet 5 of South Dublin County development Plan; the land is zoned OS – Open Space.

4.4 Criteria under Schedule 7 of Planning and Development Regulations 2001-2019

The criteria for determining if a development *would, or would not*, be likely to have significant effects on the environment is set out in Schedule 7 to the PDR 2001. The criteria are grouped under three headings as follows:

1. Characteristics of the Proposed Development
2. Location of Proposed Development
3. Characteristics of Potential Impacts.

Each of the above groupings includes a number of sub-criteria and information is provided for each in the following Sections 4.4.1 - 4.4.3 respectively.

4.4.1 Characteristics of the Proposed Development

Table 1 assesses the environmental sensitivity of the characteristics of the proposed development and the potential for significant impact.

Table1: Characteristics of the Proposed Development

Type and Characteristics of Proposed Development	Comment
a) the size and design of the whole of the proposed development,	<p>The proposed development is located on a small site. The construction area of the proposed ICW will be c.13,000m², with a final area on completion of c. 1,980m², including a treatment area of c.1,560m².</p> <p>The construction of the proposed ICW will require excavation up to 2.4m deep. Spoil arising will be either removed from site or reused locally to raise the level of the surrounding green area by up to</p>

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Type and Characteristics of Proposed Development	Comment
	700mm. Following construction of the ICW any temporary works/access areas will be reinstated.
b) cumulation with other existing development and / or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and / or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment,	<p>The small site is within the area zoned OS – Open Space – To preserve and provide for open space and recreational amenities.</p> <p>There are no other relevant developments in the vicinity and there are no elements of the proposed development that will conflict with these objectives, and there is no likelihood of <i>significant environmental effects</i> by reason of cumulation with other development for the purposes of Section 172(1A)(b) of the PDA, 2000.</p>
c) the nature of any associated demolition works	<p>Other than the removal of an existing surface water manhole, which will be rebuilt as part of the ICW works, no demolition will be required.</p> <p>The construction of the proposed ICW will require excavation up to 2.4m deep. Spoil arising will be either removed from site or reused locally to raise the level of the surrounding green area by up to 700mm. Following construction of the ICW any temporary works/access areas will be reinstated.</p>
d) the use of natural resources, in particular land, soil, water and biodiversity,	<p>There are no unusual aspects to the proposed development. The proposed development, once complete, will enhance water quality and local biodiversity value.</p> <p>Use of natural resources will be limited to the normal use of building materials and planting.</p>
e) the production of waste	<p>The construction of the proposed ICW will require excavation up to 2.4m deep. Spoil arising will be either removed from site or reused locally to raise the level of the surrounding green area by up to 700mm. Following construction of the ICW any temporary works/access areas will be reinstated.</p> <p>There are no unusual aspects to the proposed development.</p> <p>Therefore, production of waste will be limited and subject to appropriate reuse, recycling or removal to approved, licensed facilities.</p>
f) pollution and nuisances,	<p>Construction works have the potential for noise disturbance. However, any such disturbance will be temporary (limited to the construction phase), localised and controlled and mitigated by standard construction best practice and normal day-time working hours.</p> <p>No other pollution or nuisances are identified.</p>
g) the risk of major accidents, and / or disasters which are relevant to the project concerned, including those	<p>There are no unusual aspects to the proposed development.</p> <p>No particular risks are identified.</p>

Type and Characteristics of Proposed Development	Comment
caused by climate change, in accordance with scientific knowledge, and	
h) the risks to human health (for example, due to water contamination or air pollution).	There are no unusual aspects to the proposed ICW development. There will be shallow, permanent water in the ICW. The ICW banks will be sloped at 1:1 and the area will be fenced. No particular risks to human health are identified. It is noted that the main intended purpose of the proposed development will be to reduce water pollution.

4.4.1.1 Section Summary

There is no likelihood of significant effects on the environment arising from the nature of the proposed development.

The proposed development is located on a small site. The construction area of the proposed ICW will be c.13,000m², with a final area on completion of c.1,980m², including a treatment area of c.1,560m².

The construction of the proposed ICW will require excavation up to 2.4m deep. Spoil arising will be either removed from site or reused locally to raise the level of the surrounding green area by up to 700mm. Following construction of the ICW any temporary works/access areas will be reinstated.

Therefore, the scale of the proposed development, when viewed individually and / or cumulatively, is very small in terms of the extent of development and significantly below relevant EIA thresholds.

This scale of development will not give rise to significant effects on the environment either by way of its size or design.

Any potential construction-related pollution aspect will be avoided through appropriate standard construction practice management regimes.

Any noise and nuisance associated with the proposed construction works will be short-term and subject to standard construction management and best practice procedures.

The Proposed Development will not result in any significant environmental effects arising from the nature of the development. On completion, the proposed ICW will result in an overall improvement in water quality in the Camac river system.

4.4.2 Location of the Proposed Development

Table 2 assesses the location of the proposed development with regard to the environmental sensitivity of the geographical area likely to be affected and the potential for significant impact.

Table 2: Location of Proposed Development

Type and Characteristics of Potential Impacts	Comment
i) the existing and approved land use	The proposed development is located in an area of open space adjacent to the M50 Motorway Corridor. It is within the area zoned OS – Open Space – To preserve and provide for open space and recreational amenities.
j) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground,	The construction of the proposed ICW will require excavation up to 2.4m deep. Spoil arising will be either removed from site or reused locally to raise the level of the surrounding green area by up to 700mm. Following construction of the ICW any temporary works/access areas will be reinstated. The proposed development will improve on the quality and regenerative capacity of natural resources in the area.
k) the absorption capacity of the natural environment, paying particular attention to the following areas:	Having regard to the criteria listed below, it is considered that the Site has a high absorption capacity for the scale and type of development proposed.
(i) wetlands, riparian areas, river mouths;	No impact arises.
(ii) coastal zones and the marine environment;	No impact arises.
(iii) mountain and forest areas;	No impact arises.
(iv) nature reserves and parks;	No impact arises.
(v) areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive and;	A separate Screening Report for the requirement for Appropriate Assessment (AA) has been prepared and excludes any potential for impact on Natura 2000 Sites. No impact arises.
(vi) areas in which there has already been a failure to meet the environmental quality standards laid down in legislation of the European Union and relevant to the project, or in which it is considered that there is such a failure;	It is noted that the main intended purpose of the proposed development will be to reduce water pollution.
(vii) densely populated areas;	The development proposed is small in scale and will be located on a site appropriate to such development.
(viii) Landscapes and sites of historical, cultural or	There are no known archaeological monuments within the footprint or 100m buffer around the proposed ICW and no known archaeological objects

Type and Characteristics of Potential Impacts	Comment
archaeological significance.	are securely provenanced to within the footprint of the proposed ICW. The development is not located in a sensitive or significant landscape.

4.4.2.2 Section Summary

There is no likelihood of significant effects on the environment arising from the location of the proposed development.

The Screening for the requirement for Appropriate Assessment (AA) concludes the following:

In view of best scientific knowledge this report concludes that the development, individually or in combination with another plan or project, is not likely to have a significant effect on the European site.

As such no mitigation measures are required for the protection of these European sites.

In terms of other environmental sensitivities, e.g. landscapes, cultural heritage or biodiversity, the proposed development will not give rise to any significant effects.

The Proposed Development will not result in any significant environmental effects arising from its location.

4.4.3 Type and Characteristics of Potential Impacts

Tables 3 and 4 assesses likely significant effects on the environment of the proposed development in relation to criteria set out under paragraphs 1 and 2 (*i.e.* Sections 4.4.1 & 4.4.2 and Tables 1 and 2 above), having regard to the impact of the project on the factors specified in paragraph (b)(i)(I) to (V) of the definition of 'environmental impact assessment report' in section 171A of the PDA 2000.

Table 3: Type and Characteristics of the Potential Impacts

Type and Characteristics of Potential Impacts	Comment
a) the magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected),	The site for the proposed development is small (c.13,000m ²) and any potential impact will be temporary, short-term and limited to the Site area. Therefore, the geographical extent and population likely to be affected are very small.
b) the nature of the impact	There are no unusual aspects to the proposed development and any potential impacts are consistent with and typical of normal small scale development.

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Type and Characteristics of Potential Impacts	Comment
c) the transboundary nature of the impact	No transboundary impacts arise.
d) the intensity and complexity of the impact,	No impact of an unusual intensity or complexity is expected.
e) the probability of the impact	N/A
f) the expected onset, duration, frequency and reversibility of the impact,	Any potential impacts will be temporary or short-term associated with the normal construction and / demolition works of the proposed development.
g) the cumulation of the impact with the impact of other existing and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment, and	The proposed development does not give rise to cumulation with other development for the purposes of Section 172(1A)(b) of the PDA, 2000.
h) the possibility of effectively reducing the impact.	Any potential impacts will be temporary or short-term associated with the normal construction and / demolition works of a proposed development. Such potential impacts may be appropriately mitigated through standard construction best practice and control of working hours. On completion, the proposed ICW will result in an overall improvement in water quality in the Camac river system.

Table 4: Assessment against the environmental factors specified in Section 171A(b) of the Planning and Development Act 2000, as amended.

EIA Factor	Comment
Population	Positive impact as the proposed development will improve overall water quality for the benefit of the local population. No negative impact arises.
Human Health	No negative impact arises.
Biodiversity	No adverse impact arises. No impact arises on any European site (Natura 2000 Sites) or nationally designated site.– the proposed ICW, in addition to improving local water quality, will also contribute positively to local biodiversity by introducing new native habitats and species to the site.
Land	The proposed development is located on a small site. The construction area of the proposed ICW will be

EIA Factor	Comment
	c.13,000m ² , with a final area on completion of c. 1,980m ² , including a treatment area of c.1,560m ² .
Soil	The construction of the proposed ICW will require excavation up to 2.4m deep. Spoil arising will be either removed from site or reused locally to raise the level of the surrounding green area by up to 700mm. Following construction of the ICW any temporary works/access areas will be reinstated.
Water	The Site is not located within or adjacent to an area identified as being susceptible to flooding. The purpose of the development is to benefit surface water management and improve water quality.
Air and Climate	The proposed development will consist of excavation and soil movement works. The works will be undertaken to the required high standards of environmental performance.
Material Assets	The proposed development will contribute positively to the local surface water management infrastructure.
Cultural Heritage	Consultation on the proposed development with the staff of the National Monuments Service will be undertaken to enable them make appropriate recommendations at a pre-planning stage of hitherto unknown archaeological/ heritage features or soils.
Landscape	The Site is not located within or adjacent to a Natural Heritage Area (NHA). There is no impact on Special Amenity Areas, Protected Views or other landscape features of note.
Interaction between factors	No adverse impact arises as a result of any potential for interaction between environmental factors.

4.4.3.1 Section Summary

The type or characteristics of the potential impacts arising from the proposed development will not give rise to *significant environmental impacts*.

There are no medium or long-term negative impacts and the proposed development is capable of successful integration in the surrounding environment. It will, on completion result in an overall improvement in water quality in the Camac river system.

While temporary or short-term impacts relating to noise and dust are typical of any small-scale construction, the proposed works will be confined to the Site and any potential impact on nearby receptors will be effectively managed through standard best practice construction measures.

The primary purpose of the Proposed Development, which comprises the construction of an ICW, is to improve water quality. It does not give rise to any

significant impact on environmental (EIA) factors provided in Section 171A(b) of the PDA, 2000.

4.5 Overall Summary

The proposed ICW development is small-scale in nature and is in-keeping with the land use character of the existing site and will make a positive contribution to the site and the wider area.

It is advised, based upon the assessment undertaken, that the site of the proposed ICW be archaeologically tested in advance of on-site construction in order to identify the nature, extent and location of any previously unknown sub-surface archaeology related to the closely proximal monastic site and subsequent tower house at Kilnamanagh.

Based upon the results of the desk based research and the site surface inspection, the proposed development will have no impact on any known archaeological monument or protected structure. The presence of a monastery, holy well and subsequently a tower house and bawn a distance of 300m to the south west indicates that the general vicinity around the site was of archaeological significance in the medieval and post medieval period. Archaeological excavations approximately a kilometre to the north of the site in Ballymount, along the side of the M50 motorway revealed that the construction of the motorway has truncated surviving archaeology. The proposed development involving ground reduction of up to 2400mm, has the potential to expose original ground, even if the site has been built up and landscaped over the years. The site of the proposed development should be archaeologically tested in advance of construction to identify any potential sub-surface archaeology within the footprint of the site.

Consultation on the proposed development with the staff of the National Monuments Service is advised at the earliest stage in the planning process, to enable them make appropriate recommendations at a pre-planning stage of hitherto unknown archaeological/ heritage features or soils.

The Site is otherwise not considered sensitive in terms of environmental aspects, including human beings, biodiversity, or landscape. The proposed development will not impact any European site.

The proposed development will not give rise to significant environmental impacts by virtue of its characteristics, size or location or from the types of potential effects.

5 Conclusion

Having regard to the nature and limited scale of proposed development and to the limited nature of environmental sensitivities the Preliminary Examination has concluded that there is no real likelihood of significant effects on the environment arising from the proposed ICW development.

The need for further screening for Environmental Impact Assessment (EIA) or for Environmental Impact Assessment (EIA) can therefore be excluded on the basis of the Preliminary Examination, in accordance with article 120(1)(b)(i) of the Planning and Development Regulations 2001-2019.

6 References

- *Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment.*
- *Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment.*
- *Draft Guidelines on the information to be contained in Environmental Impact Assessment Reports*, Environmental Protection Agency, 2017.
- *Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding Sub-threshold Development*, Department of Environment, Heritage and Local Government, 2003.
- *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment*, Department of Housing, Planning and Local Government, 2018.
- *South Dublin County Development Plan 2016-2022*, South Dublin County Council.
- *Planning and Development Act 2000-2019.*
- *Planning and Development Regulations 2001-2019.*

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