

CUNNANE STRATTON REYNOLDS

**Presentation Building Regeneration –
Library, Cultural, Civic and Learning Space**

Environmental Impact Assessment Screening Report

To accompany

A development proposal application made under Part 8 of the Planning
Development Regulations 2001 - 2021

Document Control Sheet

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18/02/2021	<i>Orla O'Callaghan</i>

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STATEMENT OF COMPETENCY

The companies and personnel who contributed to this report and their qualifications and experience are outlined below.

The EIAR Screening Report has been compiled and coordinated by Orla O’Callaghan and Eamonn Prenter of Cunnane Stratton Reynolds Town Planning Consultants who are experienced in the coordination of such documents. The report has been prepared to support a Part 8 application under the Planning and Development Act 2000 (As Amended).

This EIAR screening assessment has been prepared by personal with competency and experience in both the EIAR and screening processes and by those qualified in the relevant fields of technical expertise. The report / assessment has also had due regard to and is consistent with the Appropriate Assessment Screening Report prepared by Cunnane Stratton Reynolds. A statement of competency / experience for each person who inputted to this EIAR Screening Report is presented below.

Orla O’Callaghan, BA (Hons), MPlan Planning and Sustainable Development; MIPI, Senior Planner, Cunnane Stratton Reynolds

Orla is a chartered town planner with both public and private sector experience. Orla has undertaken a number of EIAR’s and EIA Screening Assessments over the last number of years.

Eamonn Prenter, BA (Hons) Geography, MSc Planning; MRTPI MIPI, Director, Cunnane Stratton Reynolds

Eamonn is a chartered town planner with both public and private experience and over 30 years post qualification experience having undertaken a number of EISs, EIARs and screening reports for both types of documents. He has also carried out a number of SEAs (Strategic Environmental Assessments) for various planning policy documents including statutory local area and development plans.

Teresa Bolger, MPhil, MIAI, IPMA-C, Project Archaeologist and Consultancy Manager Rubicon Heritage

Teresa is a Project Archaeologist. Teresa is the Consultancy Manager and Coordinator of the Rubicon Dublin office. She has 19 years’ experience of directing and managing a range of both urban and rural archaeological projects in the consultancy sector, dealing with high profile clients such as the Transport Infrastructure Ireland Grangegorman Development Agency and Eirgrid.

Teresa has amassed an impressive archaeological publication record and is closely involved in all current publication projects within the company. She is particularly interested in the archaeology of the early medieval period, especially interdisciplinary approaches including contemporary historical sources and has contributed targeted historical research to many projects. In addition, Teresa has served on the board of the Institute of Archaeologists of Ireland (IAI) from 2006-2012 and on the council of the Discovery Programme from 2009–2014.

Sinéad Hughes, Postgraduate Diploma in Applied Building Repair and Conservation, Postgraduate Diploma in Architectural Inventory and Recording BA (Hons) Archaeology & Spanish, Head of Conservation at Carrig Conservation International

Sinéad is an architectural conservation and heritage consultant who has gained a wealth of experience over the past two decades. She joined Carrig as Head of Conservation in June 2019 from her own practice which she established in 2001.

Sinéad has an in-depth understanding of traditional building technology and the unique conservation needs of Ireland's built heritage, Sinéad enjoys guiding clients in the repair and rehabilitation of their historic properties and helps them navigate the planning process in relation to protected structures.

In line with international best practice, Sinéad produces specialist building reports including condition assessments, conservation method statements, architectural inventories and appraisals, architectural heritage impact assessments, and building histories.

Sinéad has managed numerous projects for public authority clients including countywide surveys of industrial heritage, thatched structures, graveyards, urban and rural inventories, and character assessments for Architectural Conservation Areas. She has assessed conservation projects for local authority grant schemes and has produced many Section 57 Declarations over the years.

1.0 INTRODUCTION

1.1 Purpose of this Environmental Impact Assessment Screening Report

Cunnane Stratton Reynolds has prepared an EIAR Screening Assessment on behalf of Carlow County Council in relation to a proposed Part 8 application comprising the redevelopment and extension of Presentation Building – Library and Cultural Hub at Tullow Street/ College Street, Carlow.

Environmental Impact Assessment (EIA) is a procedure under the terms of European Directives on the assessment of the effects of certain public and private projects on the environment. In accordance with the provision of Part X of the Planning and Development Act 2000 (as amended), an EIA shall be carried out in respect of an application for development which is specified in Schedule 5 of the Planning and Development Regulations 2001 (as amended). A mandatory EIA is required for projects that fall within the remit of Schedule 5. Where a project is of a specified type but does not meet, or exceed, the applicable threshold then the likelihood of the project having significant effects (adverse and beneficial) on the environment needs to be considered.

A 'sub-threshold' EIA may be required if the Planning Authority determines that the development would be likely to have significant effects on the environment. Schedule 7 of the Planning Regulations details the criteria for determining whether a development would or would not be likely to have significant effects on the environment considering the characteristics of the proposed development, its location and characteristics of potential impacts.

The purpose of this screening is to determine whether an Environmental Impact Assessment Report (EIAR) is required for the proposed redevelopment and extension of the Library and Cultural Hub. This Screening Report seeks to identify and detail the findings of the desktop study undertaken to analyse the impacts, if any, of the proposed development on the receiving environment and, based on the results, decide whether or not an EIAR is required.

1.2 What is an Environmental Impact Assessment Report?

This EIAR Screening Report has been prepared in accordance with the European Union EIA Directive 85/337/EC as amended by directives 97/11/EC, 2003/4/EC, 2011/92/EU and 2014/52/EU, as well as implementing legislation, i.e. Part X of the Planning and Development Act 2000, as amended (*'the 2000 Act'*), and Part 10 of the Planning and Development Regulations 2001, as amended, (most recently by the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018).

The amended directive uses the term Environmental Impact Assessment Report (EIAR) for what was formerly referred to in Irish legislation as an Environmental Impact Statement.

A definition of Environmental Impact Assessment Report (EIAR) has not been included in the revised directive. However the EPA Guidelines (2017) provide the following definition:

"A statement of the effects, if any, which proposed development, if carried out, would have on the environment. The EIAR is prepared by the developer and is submitted to the CA (Competent Authority) as part of a consent process. The CA uses the information provided to assess the environmental effects of the project and, in the context of other considerations, to help determine if consent should be granted. The information in the EIAR is also used by other parties to evaluate the acceptability of the project and its effects and to inform their submissions to the CA.

The EIAR consists of a systematic analysis and assessment of the potential effects of a proposed project on the receiving environment. The amended EIA Directive prescribes a range of environmental factors which are used to organised descriptions of the environment and these factors must be addressed in the EIAR. The EIAR should be prepared at a stage in the design process where changes can still be made to avoid adverse effects. This often results in the modification of the project to avoid or reduce effects through redesign”.

The key amendments introduced by the 2014 Directive include the following:

- The refinement of environmental factors to be considered in the assessment process – resource efficiency, climate change, population and human health, biodiversity and disaster risk prevention and management.
- Strengthening of the procedures for screening, particularly through the introduction of new information requirements to be provided by the developer (Annex IIA) and revised selection criteria to be used by the competent authority in making a determination (Annex III of Directive).
- Expansion of the information to be included in the EIAR (formerly known in Ireland as EIS) (Annex III of Directive).
- Requirement that the EIAR must be prepared by competent experts and for the competent authority to have, or have access to, sufficient expertise to examine the EIAR.
- Expansion of the information to be included in a development consent decision including a requirement for a ‘*reasoned conclusion*’ to be incorporated into the decision in respect of the significant effects of the project on the environment.
- Requirements to inform the public and to make relevant environmental information publicly accessible through electronic means and in a timely fashion during the assessment process and at the time of the decision.
- Requirement for monitoring of significant adverse effects resulting from the construction and operation of a project.

The main purpose of the EIA process is to identify the likely significant impacts on the environment associated with a proposed development and to eliminate or mitigate these impacts. The EIAR summarises the environmental information collected during the impact assessment of a proposed development. There are a number of steps to the EIA process which include Screening, Scoping, Consideration of Alternatives, Preparation of the EIAR and the examination by the CA of the information presented in the EIAR. This report comprises the screening for the requirement to prepare an EIAR.

2.0 OVERVIEW OF THE EIA SCREENING PROCESS

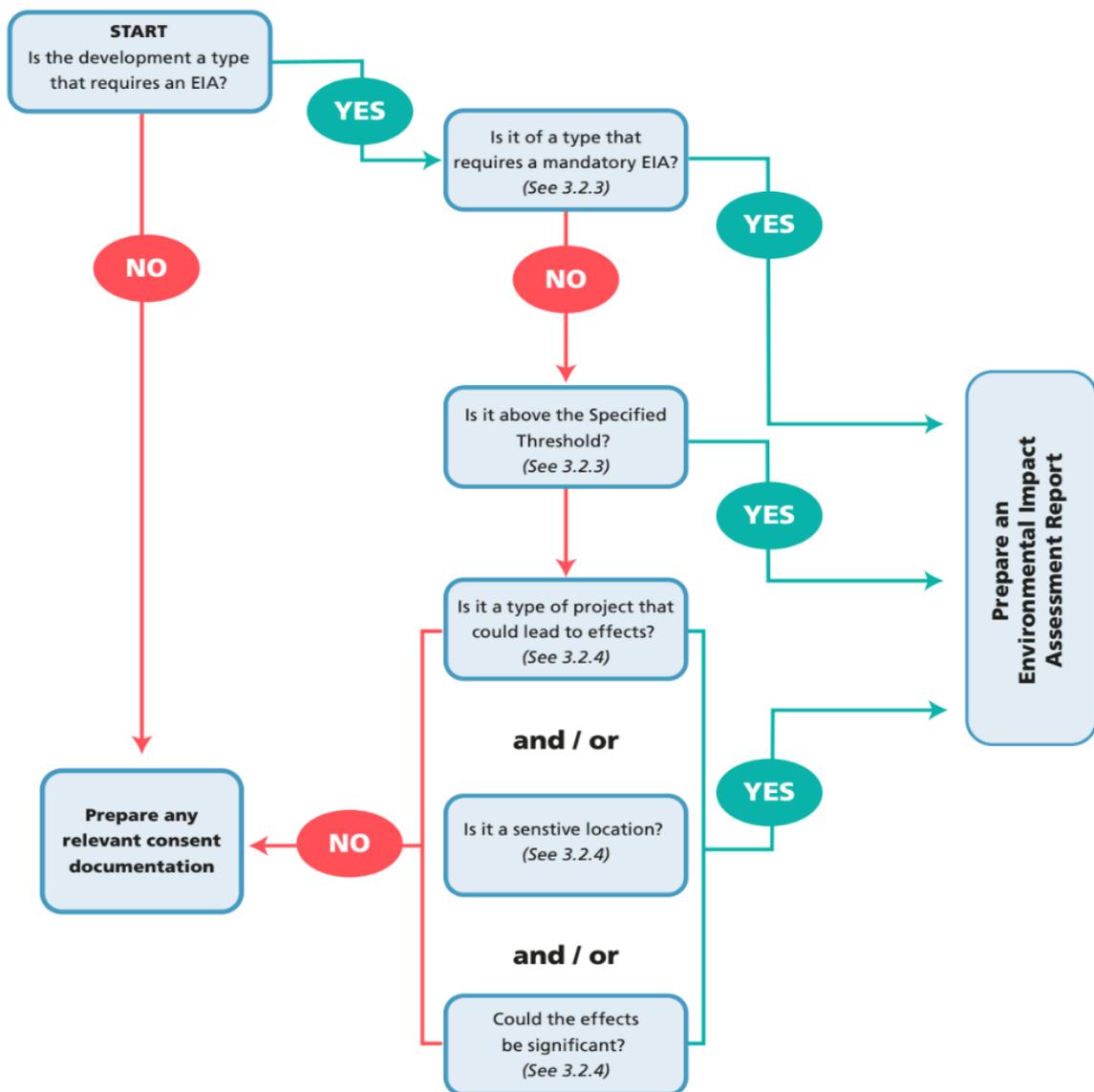
The overall purpose of this Screening Report is to identify and detail the findings of the desktop study undertaken to analyse the impacts, if any, of the proposed development on the receiving environment and, based on the results, decide whether or not an EIAR is required.

The term ‘screening’ is used to describe the process of ascertaining whether or not a proposed development requires an Environmental Impact Assessment Report to be undertaken by reference to mandatory requirements where thresholds for specified EIA development are exceeded and sub-threshold criteria where the impact on the environment is considered to be significant. EIAR legislation sets out the types of projects that require an EIAR.

The mandatory requirement for an EIAR is based on the nature and/or scale of a development. This is addressed in EU Directive 85/337/EEC (as amended by Directive 97/11/EC and 2014/52/EU). Regard must also be had to the criteria set out under Annex III of the EIA

Directive the majority of which are also referred to under Schedule 7 of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018. In determining whether a development requires an EIAR to be undertaken, it is first necessary to determine whether the development falls into a category of development for which an EIAR is mandatory and thereafter consider whether the proposed development would require an EIAR if the relevant spatial or area threshold for that category is exceeded. Where the development falls within the relevant area or spatial category as sub-threshold, it is then necessary to consider whether the proposed development is likely to give rise to significant effects on the environment. Such significant effects may arise by virtue of the type and scale of development proposed, and also the location of the development in relation to nearby sensitive environments as set out below.

Figure 1 EIAR Screening Process Diagram taken from Guidelines on the Information to be contained in Environmental Impact Assessment Reports (Draft 2017).



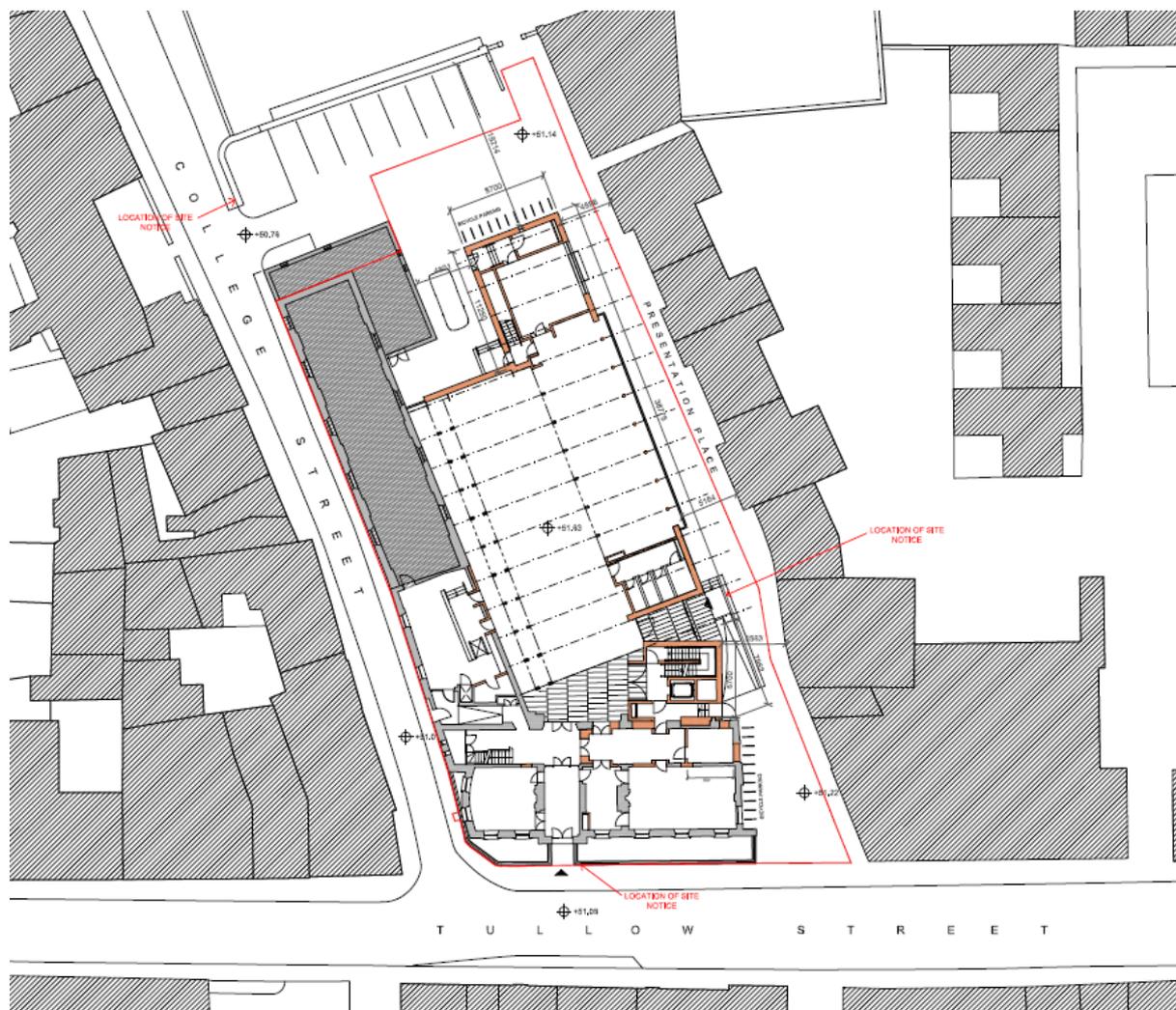
3.0 THE PROPOSED DEVELOPMENT, SITE LOCATION AND CONTEXT AND PLANNING HISTORY

3.1 Proposed Development

The proposal comprises the redevelopment and extension of Presentation Building – Library and Cultural Hub at Tullow Street/ College Street, Carlow.

The proposed development will consist of the demolition of the existing 1990's library extension to the rear of the old convent building and the construction of a double height extension to the rear of the old convent measuring 1105m² including basement to include a library, cultural, civic and learning space. The proposed development includes internal reconfiguration and conservation and restoration works to Presentation Building including removal of the existing lift shaft, repair of windows, repair of the roof, new render to the front, sides and rear and essential repairs of internal and external features. The proposal also includes exterior signage, removal of existing carpark, the provision of bicycle spaces and all associated site works, ICT antenna and mechanical/electrical equipment.

Figure 2 Site Layout Plan



The scheme provides for the reinstatement of the original floor plan of the Presentation Convent. This design proposes to remove the elevator to improve circulation and reveal the historic rooms. A new core with stairs and lift will be inserted to the south of the Convent and a circulation hub will be created to connect the old building with the new library extension. At

first floor level, the historic convent building will connect to the new extension via a half flight of stairs.

The proposed library will be a flexible, multipurpose space with removable seating for 80 people and a space for exhibitions. The library includes a mezzanine on the upper floor, lit by small windows. A book lift will be located to the northeast corner of the library and the bookstore to the north will be directly accessible by the library van.

3.2 Site Location and Context

This section describes the proposed site location, surrounding context and study area.

3.2.1 Site Location

The planning application site comprises the Presentation Building library and cultural hub. A wide range of services are provided by the library network which include access to technology, e-services, children's services, special collections, local studies, genealogy and archives, community information, lifelong learning initiatives, regular events and programmes. The site also comprises the Carlow Tourist Office and Museum which is currently within the Presentation Building. The proposed works do not include the museum.

The site is located in the eastern part of Carlow Town Centre at the junction of Tullow Street and College Street. The site is roughly rectangular in shape and approximately 0.185 hectares in area. It is located within the cultural quarter of the town which encompasses College Street, Court Street, Brown Street, Charlotte Street and a small section of Tullow Street and includes the following institutions associated with the arts and heritage: Carlow College, the VISUAL and the George Bernard Shaw Theatre, Carlow Cathedral, the Carlow County Museum, Carlow Tourism Office, the Carlow Central Library and Glor Ceatherlach which are located within the red line area and to the north/ north east of the planning application site. Tullow Street is generally comprised of commercial and retail uses.

The site is located within the town centre area where the zoning requires the protection and enhancement of the vitality and vibrancy of the town centre and to provide for and improve retailing, residential, commercial, office, cultural, tourism, public facilities, amenity and other uses appropriate to the centre of a developing urban core. It is an objective of the County Council to encourage the full use of town centre buildings and lands including the upper storeys of commercial premises, backlands and vacant properties.

The site is situated within the College Street Architectural Conservation Area and the former Presentation Convent is a Protected Structure (Record of Protected Structure ref. CT97; National Inventory of Architectural Heritage ref. 10000314).

Figure 3 Site Location

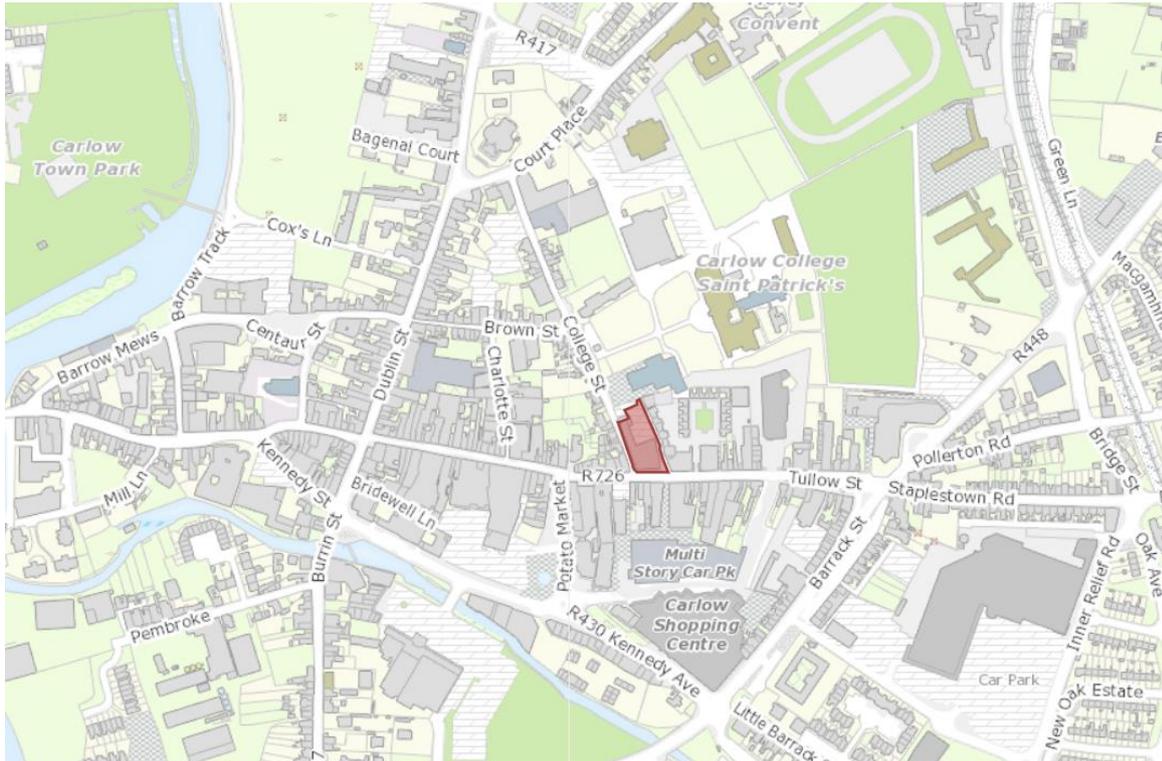
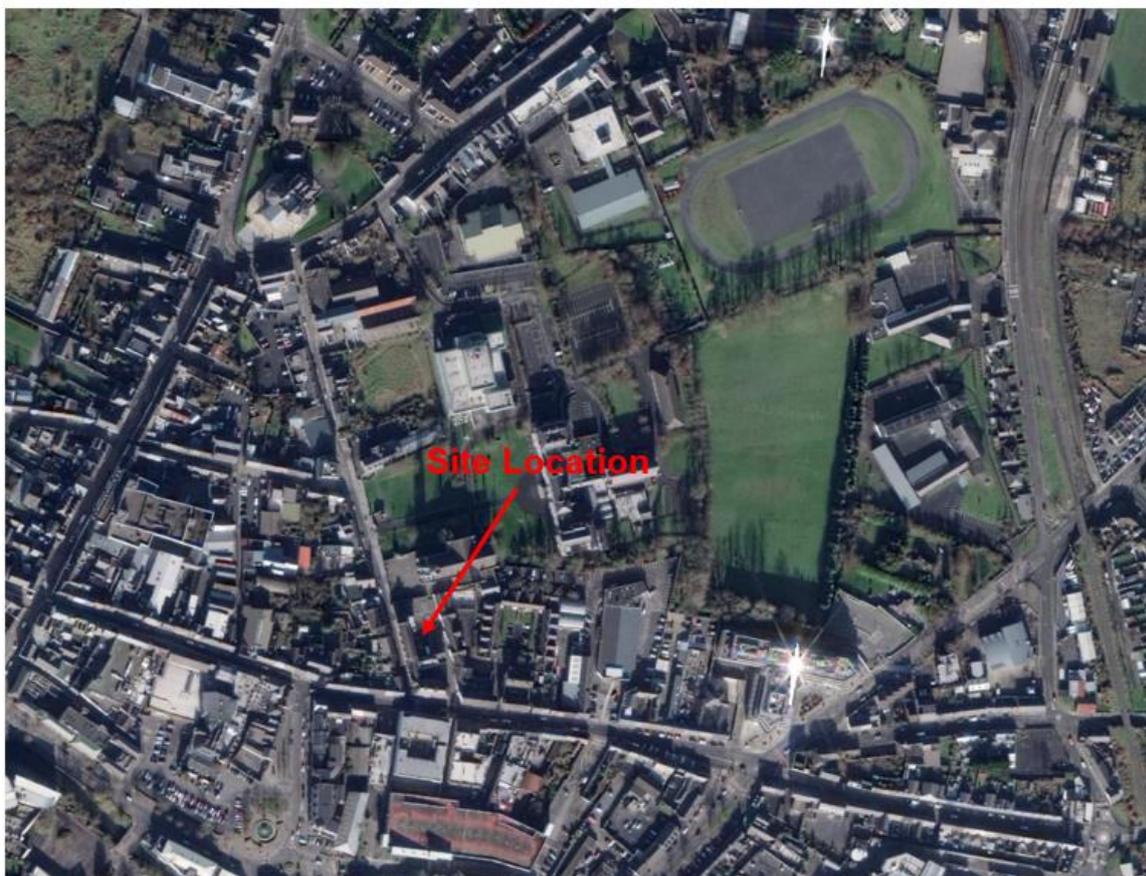


Figure 4 Aerial View of Site Location



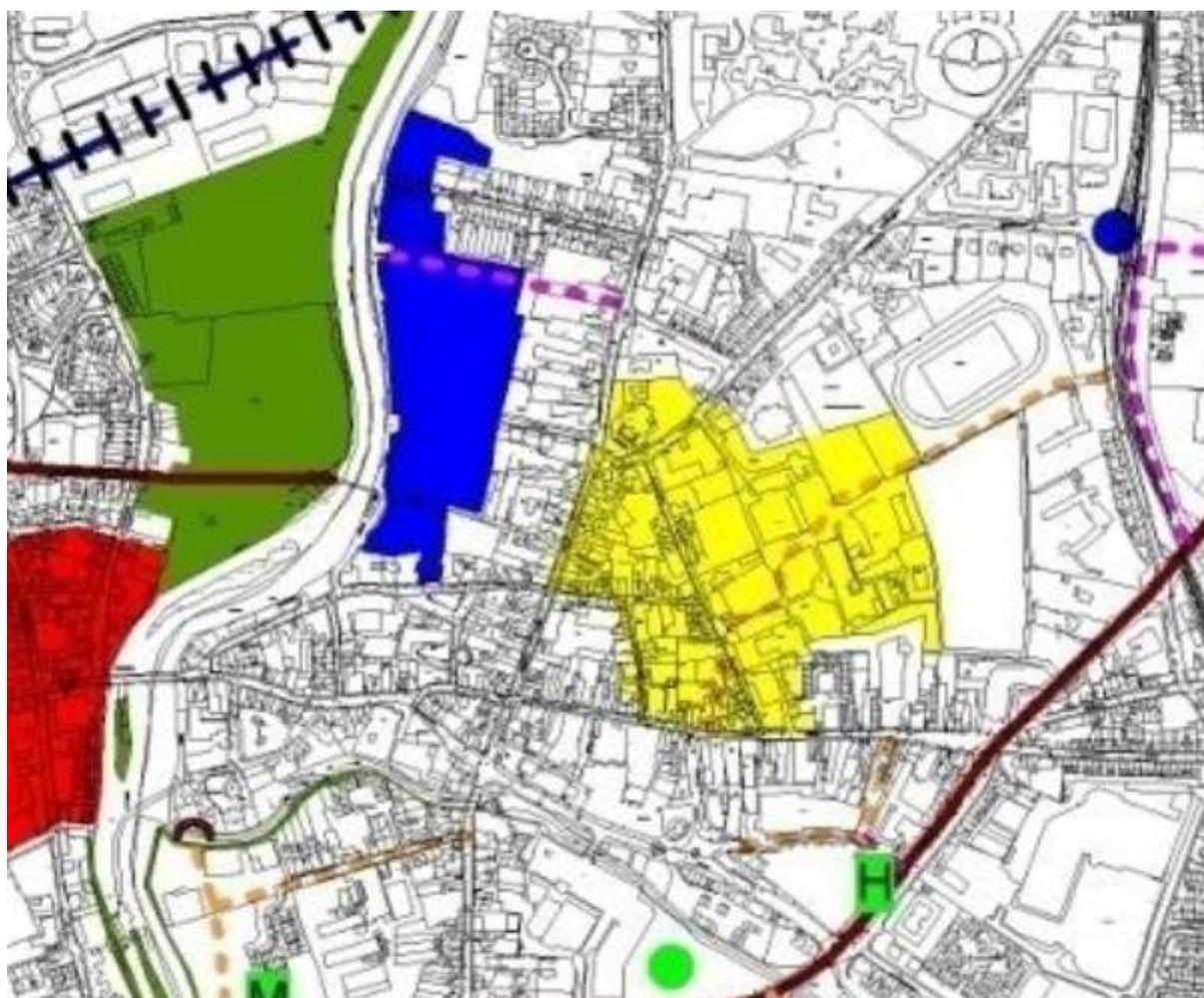
3.2.2 Site Context

Tullow Street and Dublin Street form the original street grid of Carlow, with their outlines clearly visible on early maps of the town. Tullow Street represents one of Carlow's principal shopping streets but also a gateway into the historic and cultural areas of the town. College Street is a narrow street that bounds the west of the site. College Street is predominately comprised of religious and cultural buildings and uses. Presentation Place to the east of the site is comprised of commercial uses with some residential on upper floors.

The existing buildings on site include access points from Tullow Street, College Street and Presentation Place. The closest bus stop is located on Barrack Street, approximately 300m from the site and the train station is 800m to the north east of the site on Railway Road.

As noted above, the planning application site is situated within the cultural quarter of Carlow Town. It is recognised that the establishment of a well-known and recognisable area within the Greater Urban Area to be known as the Cultural Quarter will bring significant benefits to the area. Significant investment in the cultural infrastructure of the Greater Carlow Graiguecullen Urban Area has been made in recent years leading to a concentration of cultural uses in and around College Street in Carlow Town Centre. This presents an opportunity to support and further develop a new role for this part of the Town Centre increasing use of this cultural infrastructure by locals as well as by visitors.

Figure 5 Cultural Quarter Carlow Town indicated in yellow



3.3 Planning History

The original Presentation building was constructed pre 1964 when the Planning and Development system was established. A record received from Carlow County Council Planning Department notes that there have been three planning application at this site. The relevant details are included below.

Planning Reference Number	Date Planning Application Received	Proposed Development Description	Decision
PD283	10/07/1970	Extension and Renovation Presentation Secondary School	Conditional Permission
PD2888	18/09/1992	Permission for wall and alterations at Presentation Convent	Conditional Permission
PD3063	20/05/1994	Permission to convert old school County Library	Conditional Permission

4.0 ASSESSMENT OF EIA REQUIREMENT

4.1 Annex III Criteria

Article 93 and Schedule 5 of the 2001 Planning and Development Regulations (as amended) sets out the classes of development for which a planning application must be accompanied by an Environmental Impact Assessment Report (EIAR).

Part 1 and Part 2 of Schedule 5 of the Planning and Development Regulations defines the categories and thresholds of developments requiring EIA. The subject proposal does not come under any of the stipulated categories contained in Part 1.

The proposed development falls within the category of an 'Infrastructure Project' under Schedule 5 (10) (b) of the Planning and Development Regulations, which provides that a mandatory EIAR must be carried out for the following projects:

"b)

(i) Construction of more than 500 dwellings

(ii) Construction of a car-park providing more than 400 spaces, other than a car-park provided as part of, and incidental to the primary purpose of, a development.

(iii) Construction of a shopping centre with a gross floor space exceeding 10,000 square metres.

(iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.

(In this paragraph, "business district" means a district within a city or town in which the predominant land use is retail or commercial use.)"

The proposed development does not trigger a requirement for mandatory EIA because:

- It does not comprise dwellings;
- It does not comprise a car park of more than 400 spaces;
- It does not comprise a shopping centre;
- The site area at 0.185 hectares is well below the 2 hectare threshold.

In cases where a project is mentioned in Part 2 but is classed as “sub-threshold development”, it is necessary to undertake a case-by-case examination to determine whether the proposed development is likely to have significant effects on the environment.

It is necessary to have regard to the criteria set out under Schedule 7 of the Planning and Development Regulations 2001 as amended. This schedule is a direct transposition of Annex III of EU Directive 2011/92/EU. EU Directive 2014/52/EU provides a revised Annex III and its transposition into national legislation is mandatory.

The criteria set out in Annex III are grouped into three categories:

- (i) Characteristics of Proposed Development (Project),
- (ii) Location of the Proposed Development (Project) and
- (iii) Types and Characteristics of Potential Impacts.

Consent authorities (CA) must have regard to these criteria in forming an opinion as to whether or not a sub-threshold development such as the proposed development, is likely to have significant effects on the environment. These are assessed below.

4.2 Assessment Criteria

Schedule 7, of the Planning and Development Regulations 2001 (as amended) sets out the criteria for determining whether a development as listed in Part 2 of Schedule 5 should be subject to an Environmental Impact Assessment.

The criteria are set out as follows:

4.2.1 Characteristics of the Proposed Development

The characteristics of proposed development, in particular—

(a) *The size and design of the whole of the proposed development,*

(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,*

(c) *The nature of any associated demolition works,*

(d) *The use of natural resources, in particular land, soil, water and biodiversity,*

(e) *The production of waste,*

(f) *Pollution and nuisances,*

(g) *The risk of major accidents, and/or disasters which are relevant to the project concerned, including those 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).*

4.2.2 Location of the Proposed Development

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

- (a) The existing and approved land use,*
- (b) The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground,*
- (c) The absorption capacity of the natural environment, paying particular attention to the following areas:*
 - (i) Wetlands, riparian areas, river mouths;*
 - (ii) Coastal zones and the marine environment;*
 - (iii) Mountain and forest areas;*
 - (iv) Nature reserves and parks;*
 - (v) Areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive and;*
 - (vi) Areas in which there has already been a failure to meet the environmental quality standards laid down in legislation of the European Union and relevant to the project, or in which it is considered that there is such a failure;*
 - (vii) Densely populated areas;*
 - (viii) Landscapes and sites of historical, cultural or archaeological significance.*

4.2.3 Characteristics of Potential Impacts

The likely significant effects on the environment of proposed development in relation to criteria set out under paragraphs 1 and 2, with regard to the impact of the project on the factors specified in paragraph (b)(i)(I) to (V) of the definition of 'environmental impact assessment report' in section 171A of the Act, taking into account—

- (a) The magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected),*
- (b) The nature of the impact,*
- (c) The transboundary nature of the impact,*
- (d) The intensity and complexity of the impact,*
- (e) The probability of the impact,*
- (f) The expected onset, duration, frequency and reversibility of the impact,*
- (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

(h) The possibility of effectively reducing the impact.

4.3 Characteristics of the Proposed Development

4.3.1 The Size of the Proposed Development

The proposed development includes the following elements:

The site area measures approximately 0.185 hectares and is therefore well below the urban development threshold as set out in Schedule 5 of the Planning and Development Regulations. As a result the development can be considered to be sub-threshold due to its overall size and scale. The scale of the proposed development is not significant and the height of the extension is appropriate for this urban site location and is in keeping with the surrounding development context. The construction works will be subject to a Construction Environmental Management Plan (CEMP) to reduce potential construction impacts on nearby residential properties and to manage construction related traffic. The proposed development will have significant positive benefits relative to the ‘do nothing’ scenario through the expansion of library space and services for the public.

4.3.2 The Cumulation with other Proposed Developments

In order to assess the cumulative impact of the proposed development on the receiving environment, a planning search of the Carlow County Council’s website has been undertaken and engagement has occurred with the Carlow Planning Department to gather information on recent planning applications.

A list of recent larger and/ or closer to the site planning applications is included below.

Planning Location	Reference Number and	Description of Development
19/479 134 Tullow Street, Carlow		Change of use of part of ground floor (stairs access), all of first (upper and lower) and second floor from retail to study hub for second level students (academy of study and grinds), internal alterations to same, proposed signage and associated works at 134 Tullow Street, Carlow (being a protected structure CT 98)
19/478 Penney’s, Kennedy Avenue, Carlow		For the refurbishment of the existing store (3892sqm) including retail, staff area, stock room, external envelope, new plant buildings (29.16sqm) and replacement roof to the retail store. The works will also include new signage, new canopy to loading bay, convert partial convenience retail to comparison retail, allocation of 47 No. car parking spaces including 3 No. disabled parking spaces, 15 No. bicycle stands, upgrade of existing car parking surface, landscaping and entrance to store, temporary hoarding to adjacent properties and associated works. A Natura

	Impact Statement will be submitted to the Planning Authority with the application.
19/464 Riverbank Apartments, Burrin Street, Carlow	1). Conversion of part of existing unused basement to Social Space, Gym & Laundry, and 2). Remodelling of 32 No apartments to increase the provision of single-occupancy student bedrooms without intensification of overall numbers at existing student accommodation
19/324 Green Lane, Carlow	Change of use from existing 3 storey office building (ground and first floor with second floor plant area) to purpose-built student accommodation with extensions at ground, first & second floor levels, external alterations including revised wall finishes and window openings, 2 number pedestrian entrances, refuse storage, bicycle storage, general landscaping, perimeter wall with railings and all associated site works
19/10 College Street, Carlow	Permission to retain works carried out to a Protected Structure Ref.100000440 & RPS No. CT79 and to retain the change the use of 232.27 msq from residential (basement, ground and first floor) to a restaurant use, including a new electricity meter store to the front garden and 16.20 msq covered outdoor deck to the rear of Mimosa Wine and Tapas Bar and also to construct a single storey 119.08 msq extension to an existing kitchen (part of Mimosa Wine and Tapas Bar) and to convert part of the existing kitchen to use as customer and staff toilets and a wash up area at Mimosa Wine and Tapas Bar (a Protected structure Ref. 100000440 & RPS No. CT79) and all associated site works. This is further to the granted permissions 11/6421 and 16/139, all on the lands at College Street, Carlow, Co. Carlow.
18/355 College Street, Carlow	Planning permission for change of use to a ground floor building from a medical consulting room to residential, the demolition of derelict structures to the rear, internal alterations and refurbishment and the construction of an extension to the rear of same building and associated site works
18/317 No. 41 and 42 Dublin Street at Junction of Cox's Lane, Carlow	To demolish existing two No. derelict two storey dwellings to the rear of No. 41 & No. 42 Dublin Street and Cox's Lane and construct 4 No. two bedroom, two and a half storey residential units, associated car parking, green area and connection to existing services. Planning permission is also sought for a change if use at No. 41 and No. 42 Dublin Street (junction of Cox's Lane) from existing commercial/retail use with

	residential units at first and second floor, to office use at basement and ground floor level, reinstate first and second floor residential use with new access from Cox's Lane, revised ground floor facade to No. 42, demolition of existing single storey structure to rear (No.41) and construction of 2 No. two bedroom, two and a half storey residential units, associated parking and bicycle storage, connection to existing services, refuse storage, general landscaping, new footpath and all associated site works within the curtilage of a protected structure(s).
18/265 7/8 Dublin Street, Carlow	Planning permission for a café and food hall on the ground floor and a restaurant and kitchen on the first floor along with associated site works in addition to the previously authorised activity as a retail butcher and food processing
18/208 Walshes Yard, Kennedy Avenue, Carlow	The development will consist of demolition of derelict cottage and construction of purpose built student accommodation of 32 student accommodation units with 125 No bed spaces (2 No. 8 bed space, 13 No. 6 bed space, 1 No. 5 bed space, 5 No. 3 bed space, and 11 No. 1 bed space units) in a 4 storey building of 3,800 sq.m gross floorspace including reception, manager's office, common room/gym, laundry, service yard, plantroom, bikeshed, ESB Sub Station and all site development works, landscaping, waste management facilities and all other ancillary accommodation.

The overarching policies and objectives of the Development Plan would ensure that local planning applications and subsequent grants of planning permission comply with the proper planning and sustainable development of the area. It is reasonable to assume that all development consents would incorporate conditions requiring protection of the environment during the construction phase.

Overall, it is considered that the proposed development will have a significant permanent positive impact when considered in the context of existing and or approved plans or projects.

4.3.3 The Nature of any Associated Demolition Works

The demolition proposed is restricted to the modern library and library store buildings to the rear of the site. These comprise an area of 430 sq.m.

Figure 6 Proposed Building to be demolished



4.3.4 The Use of Natural Resources

There is no evidence to suggest that the proposed development will have a detrimental impact on natural resources in the area. The proposed development comprises an existing built-up town centre site. The main use of natural resources will be land. This is urban, brownfield land that is zoned for town centre development. The construction of the proposed development will use various raw materials that are typical of construction sites. Any removal of excess material off site during the construction and demolition stage will be in accordance with best practice and sent to an appropriate licenced facility. The consumption of water and electricity will occur once the proposed development is operational. No out of the ordinary use of natural resources is expected once operational.

4.3.5 The Production of Waste

There will be construction (and demolition) waste associated with the proposed development. As part of contract requirements, the contractor will be required to develop, implement, and maintain a Waste Management Plan setting out procedures for waste management for the construction stage. A senior manager will be responsible for waste management. The manager will be competent in waste management, and would receive training, where necessary, such as the CIF/FAS Construction and Demolition Waste Management module.

All waste removed from the site will be collected only by organisations with valid Waste Collection Permits (under the Waste Management (Collection Permit) Regulations 2007 and Amending Regulations 2008). All sites to which waste is taken will be checked in advance, to ensure that they have waste licences or permits allowing them to take the type of waste that is to be sent there (under the Waste Management Acts 1996-2011 and associated Regulations, Protection of the Environment Act 2003 as amended, Litter Pollution Act 1997 as amended and the Eastern Midlands Region Waste Management Plan 2015-2021. This plan aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill wherever possible. Hazardous waste will be minimised, prevented and recovered where feasible, and only disposed of if this is not feasible, and this will be carried out in accordance with the National Hazardous Waste Management Plan 2014-2020.

No significant additional waste will arise from the operational phase of the development. As per Carlow County Development Plan all prospective developments in the County are expected to take account of the provisions of the Regional Waste Management Plan and to adhere to those elements of it that relate to waste prevention and minimisation, waste recycling facilities and the capacity for source segregation.

4.3.6 Pollution and Nuisances

The construction works associated with the proposed development have the potential to cause temporary nuisance related to noise, dust or pollution. Site works and any risk of nuisance and/or pollution such as litter, vermin, odour etc during the construction period will be managed by on-site controls and adherence to best practice guidelines.

As noted within the Construction Environmental Management Plan submitted a dust management plan will be prepared and implemented. It will include the following actions to manage dust:

- Vehicle speeds will be limited within the construction site;
- During very dry periods, surfaces in heavily trafficked locations and other areas where dust generation is likely will be sprayed with water;
- A mechanical road sweeper and wheel wash facilities, automatic where practicable, will be used to ensure that mud and other wastes are not tracked onto public roads. The wheel-washing facilities will be located away from any likely sensitive receptors;
- When dust-emission is likely then topsoil and other dust-generating material being removed from site will be transported in covered trucks, and during dry weather conditions the area of removal will be sprayed on a regular basis using a mobile tanker to control dust emissions;
- Exhaust emissions from vehicles operating within the site, including trucks, excavators, diesel generators or other plant equipment, will be controlled by the contractor through regular servicing of machinery;
- Where activities (such as drilling or pavement cutting, grinding or similar types of stone finishing operations) that may be a significant local source of fine particulate emissions, particularly PM10, are taking place, measures such as screening will be used to control emissions and prevent a nuisance within the locality;
- If cement is stored in a silo on site, a filter will be fitted to the silo;
- Dust deposition monitoring will be conducted using the Bergerhoff method (German Standard VD 2119, 1972) at a number of locations in the vicinity of the development site. Results will be compared to the TA Luft guidelines. Should an exceedance of the TA Luft limit occur during the construction phase, actions can be taken for example the erection of a screen along the site boundary, would be implemented.

In terms of noise impacts, the NRA guideline construction noise and vibration limits are considered appropriate limits for this project, and should be incorporated in project contracts. The guideline daytime noise limit is 70 dB(A). Any items of essential equipment left running at night time should not exceed 45 dB(A) at the nearest sensitive property.

Noise from the construction of the proposed development will be managed in accordance with BS 5228 'Noise Control on Construction and Open Sites', which should be explicitly stated in

project contracts. This will require the contractors to carry out detailed quantitative noise assessments of each proposed construction activity in advance of the works, and to have appropriate technical and organisational measures in place at the time of the works.

A Construction Traffic Management Plan will be developed by the Contractor for the construction stage. It is assumed that College Road and Tullow Road will continue to be used during the course of construction. Access will also be maintained down Presentation Place for pedestrians. Construction traffic will not be permitted to back up on the roadways and deliveries will be timed to minimise disruption.

The plan will address the following:

- The construction traffic will not be permitted to park locally. The contractors will make use of public transport, or a park and ride facility during the construction phase.
- Delivery times will be arranged around off-peak times to avoid traffic problems.
- Within the constraints of noise limitation, large deliveries and concrete pours will be arranged for early in the morning.
- Details of areas where sight lines are restricted will be included.
- Construction traffic will have a speed limit of 20km/hr on site.
- No materials may be stored outside the boundary of the site.
- Parking will not be allowed on public roads or footpaths
- There will be adequate signage in place and it will comply with Chapter 8 of the Traffic Signs Manual and the Safety Health and Welfare (General Application) Regulations 2007. The signage will be maintained in position by the contractor for the duration of the project.
- Signage will include: Pedestrian and traffic directional signage, approach signage for construction Site, SWL Signage for the bridge, speed limits etc.
- The site entrance will be manned during working hours, with two operatives available to direct traffic and ensure safety of the public.

During the operational stage it is considered that the proposed development would not have any negative impact in terms of pollution or nuisance. Noise and dust levels would return to baseline levels. The expected traffic to and from the site during operational phase is unlikely to have a significant impact on the area over and above the current levels of traffic in the town centre. It is anticipated that a lot of trips to the proposed development will be linked trips due to its location in the town centre.

It is noted that the proposed development is intended to be car free as it is situated within a highly accessible and walkable location. Car free development is supported by the Joint Spatial Plan which states that *“Carlow Town Council will consider car free development proposals within the Cultural Quarter because of the importance of this area to economic development and cultural vitality, its accessible location and the constraints associated with its fine urban grain and architectural heritage designations”*.

The Spatial Plan will also consider car free development proposals in the case of Protected Structures at risk where it is proposed to re-use, conserve or renovate such a Protected Structure.

4.3.7 The Risk of Accidents, Having Regard to Substances or Technologies Used

There are no substances or technologies proposed to be used such as to increase the risk of accidents from the development proposed. There are no foreseen risks of accidents subject to the strict adherence to best construction guidelines and standard environmental controls.

The proposed development is on a brownfield site, of low ecological value in terms of habitat. An Appropriate Assessment Screening has been carried out by Cunnane Stratton Reynolds, which concludes that the proposed development will not have a significant impact on the qualifying interests and conservation objectives for Natura 2000 sites, and that the integrity of these sites will not be adversely affected. The site is not located within a Flood Zone.

There are currently no Major Accident/ Seveso establishments presently within County Carlow. Therefore, the potential risk posed by a major accident and/or disaster have been considered based on a low vulnerability of such a risk and the overall risk is considered to be low.

The risks of accidents or disasters can therefore be considered to be minimal and the proposed development would not cause unusual, significant or adverse effects on the environment or local population.

4.3.8 The Risks to Human Health

The proposed development is not of a form / type that would be expected to have an impact on human health. There will be certain impacts associated with the construction of the proposed development such as impacts on noise and air quality. These will be temporary in nature and will be managed through the Construction Environmental Management Plan to be adhered to during the construction phase of the development. On completion of the construction stage noise and dust levels will return to background levels. Construction sites do pose potential health and safety risks. To reduce these risks the project developer would normally require that all contractors prepare a site specific health and safety plan before construction commences on site. The plan would set out measures to avoid such risks and measures to undertake if such risk were to occur.

Once operational there are no foreseen risks to human health. The development will not involve the use, storage, transport, handling or production of substances, materials or technology which could be harmful to human health.

The overall predicted impact on human health is considered to be positive and long term as it will involve the expansion of public and cultural services within the town centre to serve the population of County Carlow and visitors to Carlow.

4.4 Location of the Proposed Development

The site is located in the eastern part of Carlow Town Centre at the junction of Tullow Street and College Street. The predominant land uses in this area are commercial, retail and a small amount of residential development.

4.4.1 The Existing and Approved Land Uses

The existing use of the Presentation Building is as a cultural hub and library in Carlow Town Centre. There will be short term disruption to some adjoining existing land uses during the construction stage of the proposed development. However these impacts will be limited to the site area and as stated above the construction and demolition stages of the proposal will adhere to a construction management plan.

The proposed development comprising the redevelopment and extension of Presentation Building to be retained in library and tourist office use and therefore remains compatible with the Town Centre zoning and proper planning and sustainable development of the area.

4.4.2 The relative abundance, quality and regenerative capacity of natural resources in the area

The construction of the proposed development will require raw materials. The area in which the development is proposed is an area where there is an abundance of the raw material necessary for the production of such materials. The proposed development is making use of an existing urban site and therefore it constitutes the reuse of existing resources. An Appropriate Assessment (AA) Screening Report has been prepared and accompanies this planning application. The site is not located within a designated SAC or SPA. As there are no watercourses linking the site to the closest Natura 2000 sites, impacts are considered to be unlikely.

Having regard to the above the proposed development will not have a significant effect on the absorption capacity of the natural environment at the subject site. Consequently, this area has the ability to absorb the proposed development.

The proposed operational phase will not have any out of the ordinary impacts on natural resources.

4.4.3 The absorption capacity of the natural environment

As indicated above, the proposed development will involve the retention and extension of the existing uses at the site and is therefore appropriate for this Town Centre zoned site in Carlow Town.

Landscape Character

The proposed development will be located on a built up Town Centre site. It is entirely appropriate for the proposed development and consistent with the zoning objective and surrounding environment. The proposed development will not result in the loss of any areas of open space.

Visual/ Amenity Impact

During the construction phase, plant and machinery will be required on-site. The visual/ amenity impact of the construction phase is considered to be not significant and short term.

The layout, scale and design of the proposed development has been carefully considered and developed having regard to the adjoining development, the existing buildings on site including the Protected Structure and the Conservation Area. The construction of the proposed development will alter the visual environment from some viewpoints. However, having regard to the Town Centre location, recent permissions in Carlow Town Centre and national and regional planning policies and guidance which support the densification of urban sites the proposed development is considered to be acceptable. It is considered that the proposed development will have an overall positive long term impact due to the high design quality and the creation of an attractive urban streetscape.

Biodiversity

An AA Screening report for Appropriate Assessment has been carried out by Cunnane Stratton Reynolds and is based on the best available scientific information and shows that the proposed development poses no risk of likely significant effects on Natura 2000 sites either alone or in combination with other plans and projects, and therefore does not require progression to Stage 2 Appropriate Assessment.

Based on this conclusion it is submitted that the competent authority can determine, based on objective scientific information, that an Appropriate Assessment is not required

Land and Soil

The site is not within a Geological Heritage Area. The GSI Teagasc soils map (www.gsi.ie) for the site area indicates that the site and its environs consist of made ground of manmade and artificial materials. In regards to bedrock geology, a band of Milford Formation composed of Dolomitised Peloidal Calcarenitic Limestone underlies the site.

The bedrock units which underlie the site are part of a regionally important sand/gravel Aquifer and the subsoil permeability is described as being high. The proposed site is located within the Athy-Bagnelstown Gravels Groundwater Body (IE_SE_G_160). The Groundwater vulnerability is described as being high – H.

The development of the site will necessitate the stripping of topsoil and excavation of the underlying subsoils. However, given the location of the site, within an existing built-up town centre area, the loss of both land-use and soils is considered appropriate.

Water Environment

It is not considered that the construction stage would pose a significant risk to the local surface water environment, subject to standard proven construction measures being implemented.

During the operational stage generated foul effluent and surface water will be discharged to the existing municipal sewer. The development will not impact on the local surface or groundwater environment.

Flood Risk

The site is located within Flood Zone C and as such the proposed development will not cause nor contribute to flooding.

Cultural Heritage

Archaeological Heritage

The site lies within the main ZAP for Historic Carlow (CH001) and also an ACA (CH002). Analysis of historic mapping indicates that buildings were present along both street frontages by the second quarter of the 18th century.

There are three recorded archaeological monuments incorporated by the study area. These include the Zone of Archaeological Potential for Historic Carlow (CH001), the circuit of the medieval town defences including Tullow Gate (CH003) and a medieval Granite Stone Head (CH004) currently in the keeping of the Carlow County Museum.

There is one ACA within the study area - the College Street ACA (CH002).

The development site itself incorporates a Protected Structure—former Presentation Convent (CH018) There are 16 further Protected Structures within the study area. These include a parish hall (CH006), St Patrick's College and its curtilage (CH007–009), Carlow Cathedral and its precinct (CH010–011), a warehouse (CH013), a commercial unit (CH014), a barracks (CH015), a pillar box (CH021) and six houses (CH005; CH012; CH016–017; CH019–020)

The whole of the development site constitutes an area of archaeological potential (CH021). Given its proximity to the likely circuit of the medieval defences and one of the main medieval routeways into the town there is a potential that sub-surface archaeological features could survive within the site.

An Archaeological, Architectural and Cultural Heritage Impact Assessment has been carried out by Rubicon Heritage Services Ltd. While the design of the proposed development has not yet been finalised, a general evaluation of the likely impact can be made. The proposed development will require the demolition of the modern (1997/98) extension building and the erection of a new larger building in the eastern half of the site. It is possible that the new build may incorporate a basement level. Services within the site will need to be rerouted and diverted.

It is possible that the required demolition and ground reduction for the new building and associated service connections could uncover any sub-surface archaeological remains that might be present within the development site.

The following actions will be undertaken:

1. In order to identify buried or unknown archaeological remains, a programme of test trenching will be carried out at the site in advance of construction.
 - a. This should be carried out by a suitably qualified archaeologist under license and in accordance with the provisions of the National Monuments Acts 1930-2004.
 - b. A detailed report on the results of the testing programme must be submitted to the National Monuments Service (DoH/LGH) in advance of construction. This report should include a detailed impact assessment specific to the finalised development design and include appropriate measures for review and approval.
 - c. If archaeological material has been identified then, every reasonable effort should be made to preserve in situ, or reduce the impact on any such archaeological material. Where preservation in situ cannot be achieved, either in whole or in part, then a programme of full archaeological excavation should be implemented to ensure the preservation by record of the portion of the site that will be directly impacted upon. This work should be carried out by a suitably qualified archaeologist under license and in accordance with the provisions of the National Monuments Acts 1930-2004.
 - d. No construction works can proceed until the testing programme has been completed and any required mitigation measures have been approved by the National Monuments Service (DoH/LGH).
2. Notwithstanding this, all ground reduction, including (but not limited to) enabling works such as geotechnical investigations or advance works or removal of groundslabs and foundations of building to be demolished should be subject to a programme of archaeological monitoring, under licence, by a suitably qualified archaeologist.
3. If archaeological material is encountered during archaeological monitoring then it will be investigated and fully recorded. However, if significant archaeological material is encountered then the National Monuments Service will be notified. Resolution of any such significant material will be determined by the in consultation with the National Monuments Service (DoH/LGH).
4. A written report will be prepared detailing the results of all archaeological work undertaken.

Architectural Heritage

Carrig Conservation International have undertaken an Architectural Inventory, Appraisal of the Significance, Condition Report and Impact Assessment of the proposed redevelopment of Carlow Library. The primary objective of the report is to provide the client with a record of the extant structures, a condition assessment, and an appraisal of the potential impacts of the proposed development. The report includes a summary of the conservation needs, an overview of the principal conservation recommendations, sets out the findings of the impact assessment of the proposed conservation repairs and provides an impact assessment of the proposed development.

The report concludes the following:

- The proposed conservation works and the reinstatement of the original floor plan will have a positive impact on the fabric, energy performance and character of the former Presentation Convent. The architects' proposal will declutter the floor plan and will improve flow and circulation at the heart of the building.
- The proposal will have a neutral impact on the modern library extension, which is a functional but architecturally insignificant structure.
- The southern part of the museum's eastern elevation, which is abutted by the current extension, will be physically impacted by the demolition of the existing extension. Proposed Mitigation: The demolition procedures must be carefully designed so to prevent an adverse impact on the fabric of the museum building. The impact will be neutral with mitigation.
- The northern part of the museum's eastern elevation will be partially abutted by the proposed extension. By marrying the old with the new in a carefully considered way, the museum's elevation will become a significance architectural feature of the new extension. Proposed Mitigation: To mitigate damage to or loss of any historic fabric, the extension must be adequately designed to ensure it connects with this elevation in a positive way. The impact will be positive with mitigation.
- The proposal will have a neutral impact on the rear of the site.
- The removal of the existing library extension will have a neutral impact on the character of Presentation Place. The proposed extension will transform the western side of the pedestrian street.
- Having regard for the significance of the Protected Structures, the scale of the proposed extension will remain visually subordinate to these protected structures. The impact will be neutral.
- The sensitive repair of the exterior elevations of the historic convent building will benefit the character of the streetscape. The impact will be positive.
- The repair of the exterior elevations of the historic convent building will benefit the character of the ACA in which it is located. The impact will be positive.
- The additional extensions will be concealed to the rear of the Museum and Convent building and will therefore not have any impact on the established character of the ACA. The impact will be neutral.

4.5 Characteristics of Potential Impacts

4.5.1 The magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected)

The subject site comprises approximately 0.185 hectares. The scale of the proposed extension will be in keeping with the scale of buildings in this established town centre area. The proposed extension will be visible in short distance views from Tullow Street, College Street and Presentation Place but should not be visible from longer distances and the scale proposed will ensure that the development is integrated into the existing environment. The proposed development will have a long term beneficial impact on the population of Carlow

Town, the wider population of Carlow County and visitors to the County that avail of the public services and cultural uses of Presentation Building.

4.5.2 The nature of the impact

As noted above any impacts during the construction and demolition will be localised and temporary in nature and are not deemed to be significant. These will be managed by a construction management plan.

The proposed development will have long term positive impacts on population in terms of the high quality development being proposed that will enhance the urban streetscape and provide an array of public services for people of all ages in the community and visitors to Carlow.

4.5.3 The transboundary nature of the impact

Given the location, scale and nature of the proposed development no transboundary impacts are envisaged during either the construction or operational stages.

4.5.4 The intensity and complexity of the impact

The intensity and complexity of the construction phase is in keeping with modern construction projects. The operational phase of the development will result in a redevelopment and extension of the existing uses at this location and the impacts will therefore not be intense or complex.

4.5.5 The probability of the impact

Some level of construction impacts are highly likely. However, these will be localised, short term and managed by the implementation of a Construction Management Plan. Once operational the proposed development will change the urban environment of the site location. It is considered this change will have long term positive impacts in that a high quality building extension is being proposed which has been designed to respect nearby residential and commercial properties.

The development will be a positive addition to Presentation Place in that it will create a defined urban streetscape and result in an improved urban connection between the commercial and cultural areas of Carlow Town.

4.5.6 The expected onset, duration, frequency and reversibility of the impact

The construction impacts would commence in approximately 6 months of receiving planning approval. They will be short term and localised. The construction stage will be subject to a Construction Management Plan and will also have to comply with any relevant planning conditions that are imposed i.e. duration of working hours. Once constructed the development will be permanent and non-reversible.

4.5.7 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

The potential for cumulative effects from other large projects is unlikely. There are limited brownfield sites available in the immediate vicinity for development. Other approved developments have been considered above and recent permitted developments in the site

area have generally been smaller scale and modest developments including change of use applications, extension and alterations to shopfronts.

4.5.8 The possibility of effectively reducing the impact

There is a strong possibility of reducing potential impacts arising from the construction phase through appropriate project management and the application of identified best practice construction and environmental protection methods.

The proposal has been carefully designed to reduce the potential for negative impacts. This includes the promotion of sustainable travel modes as the proposed development will be car free and design measures including maintaining the height of the extension at two storeys and avoiding windows on the upper floor facing onto Presentation Place.

Table 1 below summarises the probability, extent, predicted significance, quality and duration of the proposed development.

Table 1

C – Construction Phase and O –Operational

Environmental Factor	Possible Effect	Probability	Extent	Significance of Effect	Quality of Effect	Duration
Landscape Character	C - None	N/A	N/A	N/A	N/A	N/A
	O – None					
Visual/ Amenity Impact	C - Machinery and plant on site	Likely	Local	Not Significant	Negative	Short Term
	O – Altered visual environment from some viewpoints	Likely	Local	Moderate	Positive	Long Term
Air	C – Dust emissions associated with construction works and vehicles	Highly Likely	Local	Not Significant	Negative	Short Term
	O - None predicted	N/A	N/A	N/A	N/A	N/A
Noise	C – Construction Noise	Highly Likely	Local	Not Significant	Negative	Short Term
	O – None predicted	N/A	N/A	N/A	N/A	N/A
Biodiversity	C – None predicted	N/A	N/A	N/A	N/A	N/A
	O – None predicted					
Land and Soil	C – None predicted	N/A	N/A	N/A	N/A	N/A
	O – None predicted					
Water Environment	C – None predicted	N/A	N/A	N/A	N/A	N/A
	O – None predicted					
Flood Risk	C – None predicted	N/A	N/A	N/A	N/A	N/A
	O – None predicted					

Cultural Heritage Architectural	- C – Direct impacts on Protected Structure and buildings within Conservation Area	Likely	Local	Significant (prior to mitigation measures) Neutral (with mitigation measures)	Neutral	Permanent
	O – Positive Permanent Impact	Likely	Local	Positive	Positive	Permanent
Cultural Heritage Archaeological	- C – Sub surface archaeological remains	Likely	Local	Significant (prior to mitigation measures) Moderate (with mitigation measures)	Negative	Permanent
	O - None predicted	N/A	N/A	N/A	N/A	N/A

5.0 CONCLUSIONS

The proposed development is not a project defined by Part 1 and Part 2 Schedule 5 of the Planning and Development Regulations 2001 (as amended) as requiring a mandatory Environmental Impact Assessment Report (EIAR).

Having regard to the criteria outlined in Section 7 of the Planning and Development Regulations 2001, as amended, it is concluded that the proposed development will have **no likely significant effect, indirect or direct, on the receiving environment, either on its own or cumulatively with other development** and that having regard to the effects of the proposal it is our professional opinion that no adverse impacts occur such as to warrant an Environmental Impact Assessment Report for a sub threshold development.