

# Environmental Impact Assessment Screening

St Catherine's Cemetery Extension

Kilcully

Co. Cork

Report prepared for Cork City Council

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3<sup>rd</sup> February 2023



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## 1 Introduction

Greenleaf Ecology was commissioned by Cork City Council to prepare an Environmental Impact Assessment (EIA) Screening Report to accompany a Section 8 Planning Application for the extension of St. Catherine's Cemetery to establish circa. 2199 new grave spaces, 880 burial ash plots and a natural burial ground area with associated works, while retaining much of the western natural field and old cemetery boundaries. The existing St Catherine cemetery car park is proposed to be extended to the west along the adjacent L-2962 local road, while retaining much of the natural road field boundary. This would result in an additional 47 cemetery car parking spaces, 6 disabled car parking spaces, a new pedestrian access to the Old Kilcully church grounds and the closing-up of accesses to the L-2962 local road from both an existing car park entrance and a field gate entrance. The proposed extension area comprises of 2.5 hectares.

The purpose of this report is to ascertain the legal requirement or otherwise for an EIA for the project. As a first step this report sets out why the proposed development does not require mandatory EIA. Thereafter, the report considers whether the development as a sub-threshold class of development would require EIA. To this end, the report presents information consistent with the requirements of section 176A(3)(d) of the Planning and Development Act 2000 as Revised, including the information specified in schedule 7A of the Planning and Development Regulations 2001. It also presents an assessment of whether the development would, or would not, be likely to have significant effects on the environment, based on the criteria set out in schedule 7 of the Planning and Development Regulations 2001.

Whether a 'sub threshold' development should be subject to EIA is determined by the likelihood that the development would result in significant environmental effects. Significant effects may arise due to the nature of the development, its scale or extent and its location in relation to the characteristics of the receiving area, particularly sensitive environments.

This report documents the methodology employed to complete the screening exercise, having regard to relevant legislation and guidance documents. It also sets out a clear rationale for each decision made in the process.

The application is also accompanied by an "Article 6(3) Appropriate Assessment Screening Report", which was prepared by Greenleaf Ecology (2022).

The findings of all survey reports and assessments which accompany the application, and the relevant site and desk studies are referenced where appropriate in this EIA Screening Report.

The location of the proposed works is shown in Figure 2-1 below.

### 1.1 Statement of Authority

This EIA Screening Report has been prepared by Karen Banks MCIEEM. Karen is an ecologist with Greenleaf Ecology and has 16 years' experience in the field of ecological assessment. Karen has worked on EIA screening reports for a range of small and large-scale projects.

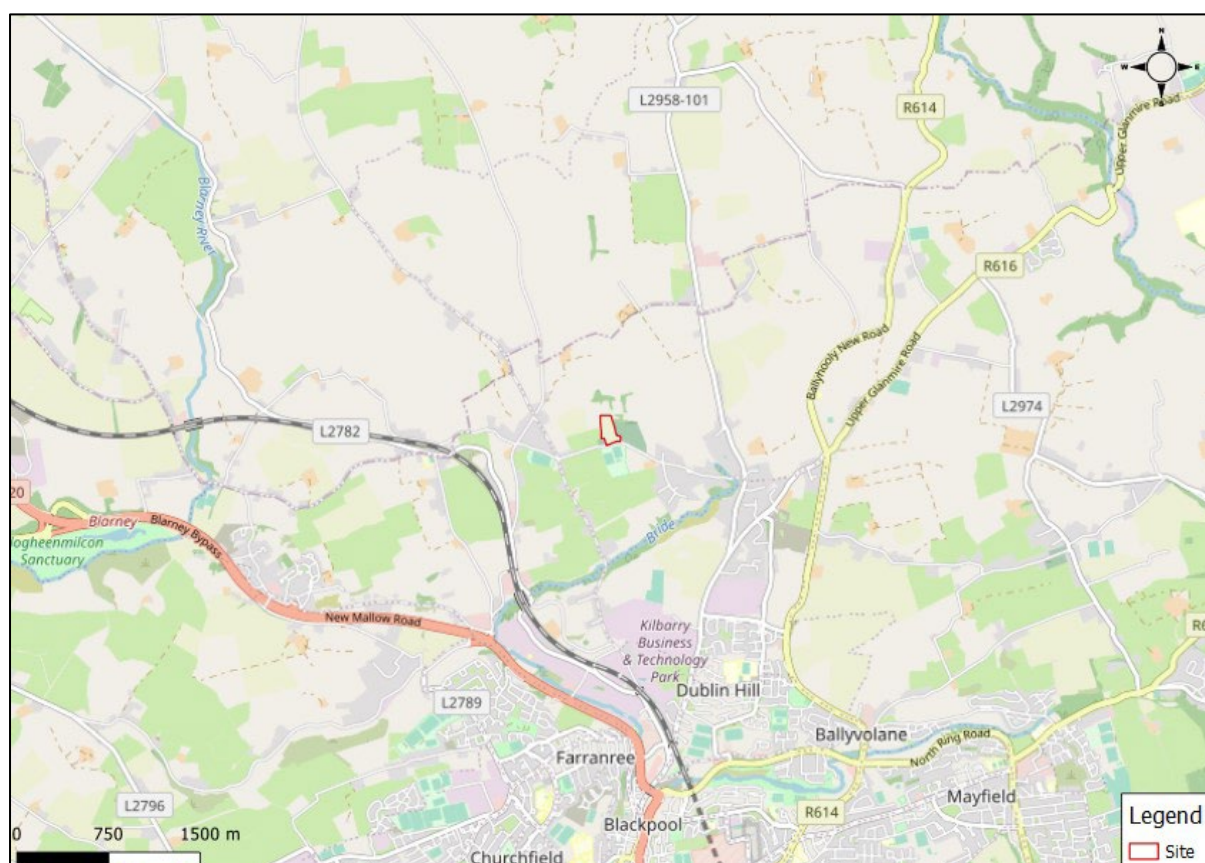
## 2 Description of the Proposed Development

### 2.1 Site Location

The proposed site is located in the townland of Kilcully, north of Cork City and covers an area of approximately 2.5 hectares. The proposed extension area is situated to the west of the existing cemetery in an agricultural grassland field and would connect the existing St Catherine’s cemetery with the Old Kilcully church and its small surrounding burial grounds. Saint Mary’s AFC is located to the south of the proposed site and agricultural grassland bound by hedgerows and treelines and small pockets of woodland and scrub are present in the wider landscape.

Figure 2-1 illustrates the location of the proposed cemetery extension.

Figure 2-1: Site location map



### 2.2 Development Description

The proposed project involves extending the existing St Catherine’s cemetery burial ground located in the townland of Kilcully, north of Cork City. The proposed extension area is situated to the west of the existing cemetery in an agricultural grassland field and would connect the existing St Catherine’s cemetery with the Old Kilcully church and its small surrounding burial grounds. It is proposed to develop the extension area to establish circa. 2199 new grave spaces, 880 burial ash plots and a natural burial ground area with associated works, while retaining much of the western natural field and old cemetery boundaries. The existing St Catherine cemetery car park is proposed to be extended to the west along the adjacent L-2962 local road, while retaining much of the natural road field boundary. This would result in an additional 47 cemetery car parking spaces, 6 disabled car parking spaces, a new pedestrian access to the Old Kilcully church grounds and the closing-up of accesses to

the L-2962 local road from both an existing car park entrance and a field gate entrance. The proposed extension area comprises of 2.5 hectares.

The site layout drawing is enclosed in Appendix A.

The works will include:

- Demolition of existing derelict dwelling house and boundary walls
- Removal of a small number of trees for access
- Re-grading to level the site
- Construction, to make three new accesses through the cemetery boundary wall to connect the existing and proposed burial ground areas
- Construction of new kerbing, tarmacadam surface works and line marking for additional car park area, access roads and pathways into the new cemetery extension
- Construction of toilets, storage area, storm, foul and land drainage along with any other services i.e. electrical, septic tank, etc.
- Construction of grave plot areas
- Construction of cremation/ash plot areas
- Construction of approximately 1.2m to 1.5m high new vertical rail fence with three access gates along the west boundary of the existing extension area
- Construction of black vertical bar railing fence approximately 1.8m high with an access gate for a Cork City Council compound area
- Laying out of a natural burial ground area with access routes, planting of trees, wild-flowers and grasses
- Other landscaping works and tree planting.

### 2.2.1 Surface Water

Surface water will be attenuated either in oversized storm pipes or in a swale before out falling to the drainage ditch located to the north-east of the proposed site.

Surface water runoff from the car park will pass through a bypass separator.

### 2.2.2 Foul Water Network

The existing septic tank located adjacent to the dwelling will be replaced by a new tank for the use of Cork City Council compound staff and as a public toilet.

### 2.2.3 Burial space and Cremation burial plots

Where burial space and depth allows, each single burial plot generally can cater for up to 3 standard sized coffin burials plus several burials of ashes could also be accommodated. There is rarely more than 10 burials of coffins and ashes in a single plot.

It is anticipated that the smaller cremation/ashes burial plots will cater for 4 burials, one in each of the four quadrants of the plot, but requests for up to 8 burials of ashes could be considered on a case-by-case basis for these smaller plots.

The layout of the burial plots will be managed by Cork City Council (CCC) as and when plots are made available. CCC will manage and coordinate the alignment and positioning of the burial plots as per the Detailed Design Drawings which accompany the planning application. The access roads serving each area of burial plot will provide access for plot excavation and burials. The initial construction works associated with burial plot will be restricted to ground preparation which will be completed as part of the access road construction. Plot excavation will only occur immediately prior to a burial. Maximum

burial depths are expected to be 2.4mbgl. This is in line with updated Cork City Council Burial Ground Bye-Laws.

Plots will be surfaced with grass with a narrow plinth for headstones at the head of each row of plots, and with grassed access footpaths. This is in line with CCC policy for burial grounds.

It is expected that the burial rate will not exceed 200 burials per year.

#### 2.2.4 Access Roads and Parking Areas

The internal access roads and parking areas will be the main element of the site infrastructure. The roads will provide the access to and define the areas where the burial plots will be located. The access roads and parking areas will be installed using the following methodology:

- A 360-degree excavator will be used to excavate the areas to a competent subgrade as per the locations outlined in the Detailed Design Drawings which accompany this application.
- The area where any excavations are planned will be surveyed and all existing services will be identified. All relevant bodies i.e. ESB, Gas Networks Ireland, Eir, Cork City Council etc. will be contacted and all drawings for all existing services sought.
- All plant operators and general operatives will be inducted and informed as to the location of any services.
- The excavated material will be set aside for re-use as part of road edge re-instatement and ground preparation of the burial plot areas. Any surplus material will either be stored and re-used on site at the cemetery or will be removed to a licenced tip facility.
- The excavation will be infilled with 6F2 or CI 804 stone material as appropriate.
- The road verge reinstatement and roadside landscaping will be completed as the excavations are backfilled with the stone material.
- The internal access roads and parking areas will be finished with a layer of bituminous surface.

## 3 EIA Screening Exercise

### 3.1 Relevant EIA Legislation

Environmental Impact Assessment (EIA) requirements derive from Council Directive 85/337/EEC (as amended by Directives 97/11/EC, 2003/35/EC and 2009/31/EC) and as codified and replaced by Directive 2011/92/EU of the European Parliament and the Council on the assessment of the effects of certain public and private projects on the environment (and as amended in turn by Directive 2014/52/EU).

The consolidated European Union Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (the 'EIA Directive'), was transposed into Irish planning legislation by the Planning and Development Acts 2000 to 2020 and the Planning and Development Regulations 2001 to 2020 (the 'Regulations'). The EIA Directive was amended by Directive 2014/52/EU which has been transposed into Irish law with the recent European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018).

The new legislation requires screening to be undertaken to determine whether or not specified public or private developments are likely to have significant effects on the environment and, as such, require EIA to be carried out prior to a decision on a development consent application being made.

### 3.2 Methodology

Screening is a process used to establish whether an EIA is required for a proposed development. There are a number of steps in the screening process.

The mandatory requirement for an EIA is generally based on the nature or scale of a proposed development, as set out in EU Directive.

These identify certain types and scales of development, generally based on thresholds of scale, for which EIA is mandatory. In the case of a sub-threshold development proposed by a local authority, the authority is required to carry out a preliminary examination of, at the least, the nature, size or location of the development. Where 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 of the Planning and Development Regulations 2001 for the purposes of a screening determination.

The European Commission (2017) have published a Guidance on Screening document (Directive 2011/92/EU as amended 2014/52/EU) which summarises the need for an EIA based on specific measures and/or limits, according to predefined criteria such as the projects characteristics, location and/or certain project features such as a projects' potential impacts.

In addition, there is sometimes a requirement for EIA 'sub-threshold' developments and, in this respect, it may be necessary to undertake a screening exercise to assess whether the proposed development requires the preparation of an EIAR.

A methodology was developed to formally screen the proposed development, which was based on Environmental Impact Assessment (EIA), Guidance for Consent Authorities regarding Sub-threshold Development (EPA, 2003) and the recent 2017 guidance issued by the EU. The screening exercise is divided into a section on Mandatory EIA and another on Sub-threshold or Discretionary EIA. In each section below a screening matrix is presented which examines the requirement for EIA according to the criteria set out in the relevant legislation. The rationale behind the responses within the matrix is provided at the end of each section.

### 3.3 Mandatory Environment Impact Assessment

Section 172 of the Planning & Development Act 2000, as amended, provides the legislative basis for mandatory EIA. It states the following:

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

*the proposed development would be of a class specified in –*

*(i) Part 1 of Schedule 5 of the Planning and Development Regulations 2001, and either*

*I. such development would exceed any relevant quantity, area or other limit specified in that Part, or*

*II. no quantity, area or other limit is specified in that Part in respect of the development concerned,*

*or*

*(ii) Part 2 of Schedule 5 of the Planning and Development Regulations 2001 and either –*

*such development would exceed any relevant quantity, area or other limit specified in that Part, or*

*II. no quantity, area or other limit is specified in that Part in respect of the development concerned,*

*or*

*(i) the proposed development would be of a class specified in Part 2 of Schedule 5 of the Planning and Development Regulations 2001 but does not exceed the relevant quantity, area or other limit specified in that Part, and*

*(ii) the planning authority or the Board, as the case may be, determines that the proposed development would be likely to have significant effects on the environment.”*

Under the provisions of Article 120 of the Planning and Development Regulations 2001 “Sub-threshold EIAR”, where a local authority proposes to carry out sub-threshold development, the authority proposing shall carry out a preliminary examination of at least the size or location of the development. The obligations with regard sub-threshold are outlined in Section 3.4 below.

Further to the above, Schedule 5 of the Planning & Development Regulations 2001, as amended sets out a number of classes and scales of development that require EIA. There is no class set out under schedule 5 in relation to the provision of a burial ground.

Under the provisions of Schedule 5 and considering the various infrastructural elements proposed, the closest type of project to the subject development is:

The provision of *“all private roads which would exceed 2,000 metres in length”*, as per Item 10 (a)(dd) of the Schedule. The proposed development will involve the provision of 1,152 linear meters or approximately 4700m<sup>2</sup> of access road which is below the threshold and therefore is not subject to EIA

In addition, Item 10(b)(ii) of Schedule 5 Part 2 require an EIA to be undertaken where it is proposed to construct a carpark providing more than 400 spaces. The proposed development will provide a total of 53 no. car-parking spaces therefore this threshold will not be reached.

Item 10(b)(iv) sets out a requirement for EIA for developments on sites in areas other than business districts and urban areas with an area exceeding 20 hectares. The proposed site has an area of 2.5 hectares therefore this threshold will not be reached.

### 3.4 Sub-threshold Development

Section 172 of the Planning & Development Act 2000, as amended, also sets out the basis for EIA for developments which may not be of a scale included in Schedule 5 of the Planning & Development



Regulations 2001, as amended. This allows a consenting authority to require EIA where it is of the opinion that a development (although sub-threshold) is likely to have significant effects on the environment and therefore should be subject to EIA. In this context, the consideration of 'significant effect' should not be determined by reference to size only and the nature and location of a project must also be taken into account.

Class 15 of Schedule 5 provides for EIA/EIAR for developments under the relevant threshold, where the works would be likely to have significant effects on the environment. This states the following:

*"Any project listed in this Part which does not exceed a quantity, area or other limit specified in this Part in respect of the relevant class of development but which would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7."*

It is considered that the type of project subject to EIA remains those listed in Schedule 5 of the Planning & Development Regulations 2001, as amended. The proposed development, as outlined in Section 2 above, is not a project type listed in either Part 1 or Part 2 of Schedule 5 of the Planning & Development Regulations 2001, as amended and therefore does not constitute a 'Project' that falls beneath any of the specified thresholds in Part 2.

As the proposed development is not a 'Project' listed in Part 1 or Part 2 of Schedule 5 of the Planning & Development Regulations 2001, as amended, EIA is not required.

Notwithstanding the above, an evaluation of the Schedule 7 criteria is provided below in the interests of completeness.

### 3.5 Projects for the Cumulative Assessment

The proposed development was considered in combination with other projects in the area that could result in cumulative effects on the environment.

The online planning system for Cork City Council and the Cork City Council website were consulted on the 8<sup>th</sup> January 2023 for local planning applications and details on Part 8 planning applications in the townland of Kilcully.

A total of eleven complete applications with associated decisions made by the local authority were returned for the last 5 years. These applications related to permission for demolition of existing building and construction of 2 no. dwelling houses (Ref: 2039722), construction of a new dwelling house (Ref: 186621), part demolition of structure and conversion to new dwelling house (Ref: 2140665), 6 no. new dwelling applications (Ref: 2039085, 2039346, 194687, 186506, 2240901 and 2039603), alteration and extension to domestic dwelling (Ref: 2140687) and retention permission for a change of use (domestic) (Ref: 2140290).

Given the nature of the developments i.e. small scale residential dwellings, the potential for ongoing environmental effects and associated potential cumulative effects with the currently proposed development are low and not significant.

The Kilcully Pedestrian Safety Scheme is located from St. Catherine's Graveyard along the L2962 to the junction with the L2958, continuing north before terminating at the Anname Bridge. The report to inform AA screening for the pedestrian safety scheme (Mott McDonald, 2022) concluded that on the basis of objective scientific information following appropriate assessment screening, that the proposed works, individually or in combination with other plans or projects, will not have a significant effect on any European sites. The EIA screening for the pedestrian safety scheme (Mott McDonald, 2022) concluded that there is no real likelihood of significant effects on the environment arising from

the proposed development. There is thus no requirement for formal EIA Screening to be undertaken and an EIA is not required. Given the characteristics of the development, the potential for ongoing environmental effects and associated potential cumulative effects with the currently proposed development are low and not significant.

### 3.6 Sub-threshold Assessment

The 1997 amending Directive (97/11/EC) introduced guidance for Member States in terms of deciding whether or not a development is likely to have 'significant effects on the environment'. The criteria have been transposed in full into Irish legislation, in the Third Schedule to the EC EIA (Amendment) Regulations 1999 (S.I. No. 93 of 1999) and in Schedule 7 to the Planning and Development Regulations 2001 (S.I. No. 600 of 2001) as amended.

As required under Article 120 of the Planning and Development Regulations 2001 "Sub-threshold EIAR" Where there is significant and realistic doubt with regard to the likelihood of significant effects on the environment arising from the proposed development, the local authority shall prepare, or cause to be prepared, the information specified in Schedule 7A for the purposes of a screening determination.

Schedule 7A of the Planning and Development Regulations 2001, as amended sets out the information to be provided by the applicant or developer for the purposes of screening sub-threshold development for environmental impact assessment.

- 1) A description of the proposed development, including in particular—
  - a) a description of the physical characteristics of the whole proposed development and, where relevant, of demolition works, and
  - b) a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.
- 2) A description of the aspects of the environment likely to be significantly affected by the proposed development.
- 3) A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from—
  - a) the expected residues and emissions and the production of waste, where relevant, and
  - b) the use of natural resources, in particular soil, land, water and biodiversity.

The information required by the Schedule 7A has been set out in Section 2 above as well as the assessment of the criteria for Schedule 7 below. The assessment of the criteria set out on Schedule 7 provides the description and assessment of any likely significant effects from the proposed development

The Schedule 7 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 criteria for consideration. The assessment of the likelihood of significant environmental effects is based on the overall consideration of all criteria and requires clear and rational judgment. The DoEHLG Guidance Document 'Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding Sub-threshold Development' states that:

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

The Schedule 7 criteria to be reviewed are discussed in more detail, with reference to the proposed development, in the following subsections. The screening questions are based on the criteria listed under each grouped heading in Schedule 7.

In addition, the exercise takes account of updated or additional screening criteria as set out in EIA Directive 2014/52/EU.

Table 3-1: Characteristics of the proposed development

<b>Characteristics of the Proposed Development – Screening Questions</b>	<b>Comment</b>	<b>Significant-Yes/No</b>
Could the scale of the proposed works be considered significant?	Demolition works to a disused dwelling present at the site are proposed as part of the project. However, the demolition works are small scale and potential impacts are minor. The proposed works are considered small scale in nature as outlined in more detail in Section 2 above. Given the relatively small scale of the development, there is potential for only slight impacts.	No. The size or scale of the proposed works is not considered significant.
Considered cumulatively with other adjacent proposed developments, would the size of the proposed works be considered significant?	No other factors have been identified that could lead to environmental impacts or potential cumulative impacts (including the Kilcully Pedestrian Scheme, see Section 5).	No. Not Significant.
Is the nature of the proposed works significant?	The proposed works comprise the construction of a car park with c. 53 no. spaces, access road, pathways, toilet, boundary treatments; the provision of c.2199 new grave spaces and 880 burial ash plots; and the demolition of an existing dwelling at the proposed site. The duration is short (c. 6 months).	No. Not Significant.
Will the proposed works utilise a significant quantity of natural resources?	The proposed works will utilise a small quantity of natural resources during construction. Land - The existing use of the land where the development is to be carried out comprises improved agricultural grassland. The proposed development is described in Section 2 and the proposal drawings accompanying this planning application. From a ‘land’ perspective, the impact of the proposed development is relatively minor in terms of area of land required: the proposed site comprises c.2.5ha for development and will replace the existing	No. The use of natural resources during the construction phase will be small in nature, and the use of non-renewable sources are of those that are not deemed to be in short supply.

	<p>improved grassland of low ecological value, currently used as agricultural land. Therefore, no significant impact on land is predicted.</p> <p>Soil - The proposed development will result in earthworks requiring the excavation of a quantity of soils and subsoils. Surplus soil will be disposed of to an appropriately licensed soil recovery facility. Any effects on soils and geology would be localised and contained within the proposed development footprint. Therefore, no significant impacts on soil are predicted.</p>	
<p>Will the proposed works produce a significant quantity of waste?</p>	<p>The proposed development will require the excavation of soil for construction. This material will be reused for road edge re-instatement and ground preparation for burial plot areas on site. Any surplus material will either be stored and re-used on site at the cemetery or will be removed to a licenced tip facility.</p> <p>Fuels, lubricants, oils and hydraulic fluids will be used in machinery during construction and in any maintenance or repair work. Solvents, adhesives, sealants, oils, and paints will also be used during construction. The contractor will be required to manage any wastage in accordance with the relevant legislation. The use of spill kits will be a requirement on site. Sanitary waste and general construction waste will be managed in accordance with the Waste Management Act 1996 (as amended).</p> <p>The contractor will be required to dispose of the remains of the demolished dwelling to a licensed facility.</p> <p>Once operational, the project will not give rise to any additional production of waste and as such, no impact is envisaged.</p>	<p>No. The construction phase will give rise to the production of waste, typical to that of a project of a similar scale and nature and is not deemed significant.</p>
<p>Will the proposed works create a significant amount or type of pollution?</p>	<p>No hazardous, toxic or noxious substances will be released to air.</p> <p>Potential impacts on aquatic habitats which can arise from this type of development during the construction phase include increased silt levels in surface water run-off and inadvertent spillages of hydrocarbons from fuel and hydraulic fluid.</p> <p>Elevated silt levels could theoretically, if of sufficient magnitude, result in changes in the ecology of nearby waters. There are no watercourses within the proposed works area, however there is a drainage ditch located on the north-east corner of the site, which in periods of high rainfall would drain into the River Bride c.0.5km to the east of the site. There is a</p>	<p>No. Not Significant.</p>

	<p>vegetated buffer of c.220m grassland between the location of the proposed car park (the main area requiring excavation during the construction phase) and the drainage ditch, which would allow for settlement of solids before reaching the drainage ditch. As such, deleterious substances would be readily contained to the footprint of the proposed site and the risk of significant levels of pollutants being deposited within the drainage ditch and, in turn, the River Bride is extremely low.</p> <p>Given the limited scope of the proposed development, the loss risk of significant contamination and the distance involved, no impact from excess solids in surface water run-off during construction will occur.</p> <p>Given the small scale of the development and the distance from sensitive aquatic receptors, no impacts on water quality due to such spills during construction, will occur.</p> <p>The construction and operational stage of the proposed development will not impact on surface water quality and will not have an effect on surface water, groundwater, sea water or coastal waters.</p> <p>For more details on surface water and groundwater see the Appropriate Assessment screening report.</p>	
<p>Will the proposed works create a significant amount of nuisance?</p>	<p>The construction phase may lead to a temporary increase in background noise levels through operation of plant machinery. However, no potential for significant noise production is identified. Given the duration of the works these impacts will be slight negative, brief to temporary in nature and not significant.</p>	<p>No. Not significant</p>
<p>Will there be a risk of accidents, having regard to substances or technologies used?</p>	<p>No. The proposed works and construction methodologies are well established and will be subject to safety statements and risk assessments.</p> <p>There are no Seveso sites or existing EPA licensed sites within proximity to the proposed development. Therefore, there is not considered to be a significant impact on the vulnerability to major accidents.</p>	<p>No. Not significant</p>
<p>Would any combination of the above factors be considered likely to have significant effects on the environment?</p>	<p>No in combination effects have been identified.</p>	<p>No. Not Significant</p>

**Conclusions:**

It is concluded that the nature of the proposed development is not considered to have likely significant effects on the environment.

**Reasoning:**

The scale of the proposed works, when viewed individually and cumulatively, is small in the context of both the EIA threshold criteria and types of projects listed in the regulations which require EIA. The proposed works will involve the provision of a cemetery and all associated infrastructure plots. The works will be undertaken according to construction methodologies designed to reduce or eliminate the potential for environmental impacts as summarised in Section 2.2 and within all survey reports and assessment which accompany the application. The works will comprise the installation of internal access roads, parking areas and the ground preparation of burial plots and will involve the site excavation and the installation of roads. The construction works areas will be reinstated where possible with landscaped areas provided where proposed. The proposed works will be restricted to the existing 2.5 hectare site.

Any waste arising on site will be taken from the site for reuse or disposal, subject to normal statutory controls. Any noise and nuisance associated with the proposed works will be short term and subject to appropriate best practice procedures

3.6.1 Location of the Proposed Development

Table 3-2: Location of the proposed development matrix

Location of the Proposed Development – Screening Questions	Comment	Significant- Yes/ No
Have the proposed works the potential to impact directly or indirectly on any site designated for conservation interest (e.g. SAC, SPA, pNHA)?	The AA Screening Report (Greenleaf Ecology, 2022) for this development concluded there will not be a significant impact on qualifying interests and conservation objectives for Natura 2000 sites, and that the integrity of these sites will not be adversely affected. No significant direct, indirect or cumulative impacts on Natura 2000 sites have been identified. There are no NHAs within a 15km radius of the proposed site. There are 15 no. pNHAs located within a 15km radius of the proposed site. There is tenuous remote indirect hydrological connectivity between the proposed site and Dunkettle Shore pNHA, Douglas River Estuary pNHA and Great Island Channel pNHA, all of which are also designated as European sites. As noted, the AA Screening Report for this development concluded that no significant direct, indirect or cumulative impacts on Natura 2000 sites have been identified. There is no connectivity	No. Not significant

	between the proposed development and the remaining 12 no. pNHAs. For more details on surface water and groundwater and full details regarding potential impacts on Natura 2000 sites see the Appropriate Assessment Screening Report.	
Has the proposed development the potential to impact directly or indirectly on any habitats listed as Annex I in the EU Habitats Directive?	None of the habitats recorded within the proposed works area correspond with Annex I habitats of the Habitats Directive. The habitats recorded within the proposed development site are considered of low conservation value at a local level and are relatively common in the surrounding landscape. Therefore, there will be no direct or indirect impacts on Priority Annex I habitats.	No. Not significant
Has the proposed development the potential to impact directly or indirectly on any habitats listed as Priority Annex I in the EU Habitats Directive?	None of the habitats recorded within the proposed works area correspond with Priority Annex I habitats of the Habitats Directive. The habitats recorded within the proposed development site are considered of low conservation value at a local level and are relatively common in the surrounding landscape. Therefore, there will be no direct or indirect impacts on Priority Annex I habitats.	No. Not significant
Has the proposed development the potential to impact directly or indirectly on any species listed as Annex II in the EU Habitats Directive?	No Annex II species were recorded within proposed development site and no habitat suitable for Annex II species is present within the proposed development site.	No. Not significant
Has the proposed development the potential to impact directly or indirectly on any species listed as Annex IV in the EU Habitats Directive?	No species or signs of species listed on Annex IV of the Habitats Directive were recorded at the site. A bat survey of the disused house was undertaken in 2022 (Greenleaf Ecology, 2022) and no bats were recorded.	No. Not significant.
Has the proposed development the potential to impact directly or indirectly on any species listed as Annex I of the EU Birds Directive?	No Annex I bird species were recorded and no habitat suitable for Annex I bird species is present within the proposed development site.	No. Not significant
Has the proposed development the potential to impact directly or indirectly on the breeding places of any species protected under the Wildlife Act?	There is potential that birds nest in the hedgerows and treelines at the proposed site. Garden hedging and approximately 4m of hedgerow at the west of the site will be removed for an access path to the old cemetery. Hedgerow removal will be undertaken outside of the bird breeding season (1st March to 31st August).	No. Potential impacts on nesting birds will be avoided by undertaking clearance works outside of the bird breeding season.

<p>Has the proposed development the potential to impact directly or indirectly on existing land use?</p>	<p>The proposed site comprises agricultural lands. The land use at the proposed site will change as a result of the proposed development. No impacts on the use of surrounding lands for agricultural or residential purposes are expected.</p>	<p>No. Not significant</p>
<p>Has the proposed development the potential to impact directly or indirectly on any protected structures or Recorded Monuments and Places of Archaeological Interest?</p>	<p>The National Monuments Service is a database of archaeological monuments which is available on the website <a href="http://www.archaeology.ie">www.archaeology.ie</a>. There are two (2) archaeological monuments recorded within the immediate environs of the proposed development site: Kilcully Church (Ref: CO063-065002) and Kilcully Graveyard (Ref: CO063-065001) are located adjacent to the western site boundary. The zone of notification for these monuments is c.60m. In addition, a standing stone (CO063-066) is located c.450m to the south; a corn mill (CO0063-067) is c.850m south and three Mills (CO068/01/02/03) are located c.800m south-east of the proposed site.</p> <p>Minor works to create a pedestrian entrance to the Old Kilcully Church and surrounding burial ground from the new proposed extended car park will be reviewed on site and a Section 12 notification will be submitted by the Cork City Council Archaeologist. An Archaeological Assessment of the proposed cemetery extension (Brett, C (2005) concluded that there are no archaeological reasons why the development at the site should not proceed.</p> <p>There are no structures identified on the National Inventory of Architectural Heritage in the vicinity of the site.</p> <p>Given the small scale of the development there will be no impact on Recorded Monuments or Places of Archaeological Interest.</p> <p>The Cork City Development Plan 2022-2028 does not indicate any specific archaeological requirements with respect to the proposed site.</p>	<p>No. Not significant</p>
<p>Has the proposed development the potential to impact directly or</p>	<p>The Cork City Development Plan 2022-2028 mapped objectives<sup>1</sup> illustrate</p>	<p>No. Not significant</p>

<sup>1</sup> [Volume 2 - Mapped Objectives, CCDP 2022-28 \(corkcity.ie\)](#)



<p>indirectly on strategic views as outlined in the City Development Plan?</p>	<p>landmark buildings, strategic viewing locations and strategic views. There are no landmark buildings, strategic viewing locations and strategic views at the proposed site and its environs. There is no identified potential for any conflict with landmark buildings or views at the subject site.</p>	
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Figure 3-1: Protected structures and places of archaeological interest (Archaeology.ie)



**Conclusion:**

It can be concluded that there will be no significant direct or indirect impacts by virtue of the location of the proposed development on the receiving environment.

**Reasoning:**

The European Communities (Natural Habitats) Regulations, 1997 requires that an Article 6(3) assessment be carried out where it is considered that a development is likely to have a significant effect on Natura 2000 sites (SAC/SPA). In this regard an Appropriate Assessment (AA) Screening Report

has been completed for the proposed works. This report concludes that the proposed St Catherine’s Cemetery Extension, Kilcully, Co. Cork either alone or in-combination with other plans and/or projects, does not have the potential to significantly affect any European Site, in light of their conservation objectives.

Indirect impacts which may potentially affect any other designated sites have been discounted due to the lack of connectivity to nationally designated sites. The risk of any significant negative impacts on any European or nationally designated sites can be excluded.

The site survey undertaken to inform the AA screening report indicates that no sensitive habitats considered to qualify as Annex I habitats under the EU Habitats Directive will be affected by the proposed development. No EU Habitats Directive Annex II or Annex IV species will be affected by the proposed development. In terms of land use, the proposed development will be confined to the 2.5 hectare site on which it is proposed. There will be no significant impact on land use.

Potential impacts on birds that may be nesting within the hedgerows located at the proposed site will be avoided by undertaking hedgerow removal outside of the bird breeding season (1st March to 31st August). A bat survey of the disused dwelling has been undertaken and no evidence of roosting bats was recorded. The receiving environment of the proposed works can accommodate the development without significant impact.

### 3.6.2 Characteristics of Potential Impacts

A further screening exercise was completed to assess the most significant potential impacts, as outlined in Table 3-3 below. These are the sections that would be covered in any EIA as specified in the EU Directive 85/337/EEC (as amended by Directive 97/11/EC).

Table 3-3: Significance of impact

EIA Section	Brief Assessment of Impacts	Significant- Yes/No
Human Beings	<p>Impacts associated with the construction of the cemetery extension may include a temporary increase in background noise levels through operation of plant machinery. However, no potential for significant noise production is identified. Given the duration of the works these impacts will be slight negative, brief to temporary in nature and not significant. There will be limited dust emissions during the construction stage, these will be controlled through the Construction Environmental Management Plan (CEMP) to be prepared by the nominated contractor.</p> <p>Best practice and implementation of a Health and Safety Plan will be required to ensure no risks to the population working on the site or working adjacent to the site during construction. A CEMP will be prepared by Cork City Council in advance of construction to ensure the implementation of measures that will avoid and minimise impacts of noise and dust on human health and the population during the construction stage.</p>	<p><b>Construction</b> Slight negative, brief to temporary in nature and not significant impacts from noise.</p> <p><b>Operation</b> Long term slight positive effect as a result of burial services to the local population.</p>

	<p>No significant impacts for the operational phase are envisaged in terms of traffic, noise, air quality or climate.</p> <p>Drainage measures proposed will ensure that there is no runoff to surface water during the construction or operation phase therefore avoiding the potential for any significant impacts to humans.</p> <p>The objective of the project is to provide sufficient burial facilities for the north Cork area which will result in an indirect benefit to population and human health.</p>	
Biodiversity	<p>The proposed cemetery extension is situated in an area of existing improved agricultural grassland which is considered of local importance and low ecological value.</p> <p>No Annex I habitat, Annex II or Annex IV species were recorded at the proposed site and its environs during the site visit by the ecologist. The assessments concluded that there is no potential for significant impacts to Annex I habitats or Annex II and Annex IV species. There is potential for impacts on nesting birds protected under the Wildlife Act during hedgerow removal. This will be avoided by undertaking hedgerow removal outside of the bird breeding season (1st March to 31st August).</p> <p>In view of the factors detailed above, no potential significant threats to species or habitats of conservation concern during the construction or operational phase were identified. The AA screening report (Greenleaf Ecology, 2022) prepared for the application concluded that there is no potential for significant effects to European sites as a result of the proposal.</p>	<p>Construction – significant effects on biodiversity will be avoided by undertaking hedgerow removal outside of the bird breeding season.</p> <p>Operation – No Significant effects</p>
Soils & Geology	<p>Land - The existing use of the land where the development is to be carried out comprises built areas/artificial surfaces and agricultural land comprising agriculturally improved grassland. The proposed development is described in Section 2. From a ‘land’ perspective, the impact of the proposed development is relatively minor in terms of area of land required (2.5ha) for development and replacing the existing agricultural land of low ecological value. Therefore, no significant impact on land is predicted.</p> <p>Soil - The proposed development will result in earthworks requiring the excavation of a quantity of soils and subsoils. Where possible, surplus soil will be reused for landscaping purposes on site. In the event that any excess excavated material is generated onsite during the course of the construction works, it will be disposed of off-site to a suitably authorised and licensed facility.</p>	<p>Construction – No Significant Effects</p> <p>Operation – No Significant effects</p>

	Any effects on soils and geology would be localised and contained within the proposed development footprint. Therefore, no significant impacts on soil are predicted.	
Water	<p>Water and Groundwater - During the construction phase there is potential for silt, grit, fuels, oils or known soil contaminants to enter a drainage ditch at the north-east of the proposed site. However, during the construction phase, any surface water run-off that is generated during excavation shall be prevented from entering the drainage ditch by the retention of a vegetated buffer between the footprint of the proposed works and the drainage ditch, which will filter out any solids that may be present in surface water run-off.</p> <p>Removal of soil and/or subsoil for development could lead to an alteration to groundwater movements in the area or alteration of the pathway of the groundwater flow through other materials. In terms of groundwater recharge, there would be no change in recharge from the proposed development. Therefore, there is not considered to be a likely significant impact on water and groundwater.</p> <p>An AA Screening report has been prepared and concluded that the proposed works will not result in significant impacts to any European site.</p>	<p>Construction – No Significant Effects</p> <p>Operation – No Significant effects</p>
Air & Climate	<p>Air and Climate - During construction there may be slight adverse effects on air quality, including generation of dust, as a result of construction related machinery. Effects are anticipated to be localised, slight and temporary in nature and can be mitigated against through best practice.</p> <p>Noise - In terms of noise, the construction phase may lead to a temporary increase in background noise levels through operation of plant machinery. The closest potentially sensitive use is residential properties located in the vicinity of the proposed site (Figure 3-2). Overall, the site is largely screened from the surrounding landscape. The proposed development will be constructed sympathetically with the existing environment. Therefore, significant landscape and visual impacts are deemed not likely.</p> <p>Given the location of the proposed development and the nature of the works occurring, it is concluded that any construction related noise will be slight negative, brief to temporary in nature and not significant.</p> <p>Operational noise will not lead to any significant change over background noise levels. Therefore, there is not considered to be a likely significant impact on air quality and noise.</p>	<p>Construction – slight adverse temporary increase in noise and dust deemed not significant</p> <p>Operation -No Significant impacts are predicted.</p>
Material Assets	The main impact in respect of material assets is potential impact of traffic generated from the	Construction – No Significant Effects

	<p>construction works on the condition/surfacing of the existing surrounding road network. The construction of the development will give rise to a temporary increase in construction related traffic on the local roadways. The extent of construction traffic will not be excessive and will have a relatively small impact given the existing quantity of traffic on the local road network. The extent of impact on the condition of the road network is considered to be slight and temporary.</p> <p>The area where any excavations are planned will be surveyed and all existing services will be identified. No diversions or interruptions to services will be required. The value of the existing agricultural land is a material asset of the site. In national terms, as reported in the August 2018 Fact Sheet on Irish Agriculture by the Department of Agriculture, Food and the Marine, there are currently 4.8 million hectares of land used for agricultural purposes in the country. According to the Central Statistics office (2018), grassland accounted for between 61% and 63% of total land use in Ireland between 1990 and 2016. The loss of 2.5ha of land is not deemed to be a significant impact on grassland habitats in general.</p> <p>Therefore, there is not considered to be a likely significant impact on material assets.</p>	Operation – No Significant effects
Cultural Heritage and Landscape	<p>As noted above, there are two archaeological monuments recorded within the vicinity of the proposed development site: Kilcully Church and Kilcully Graveyard, both of which are located adjacent to the western site boundary. The cemetery extension will preserve these archaeological monuments and an access path will be provided into the old graveyard and Kilcully Church. As noted previously, an Archaeological Assessment of the proposed cemetery extension (Brett, C (2005) concluded that there are no archaeological reasons why the development at the site should not proceed.</p> <p>No scenic views will be impacted by the Project.</p> <p>There will be no significant impact on cultural heritage or landscape.</p>	No
Interaction of Foregoing	<p>On the basis of the assessment of the above it is not considered that any environmental impacts resulting from the cumulative interaction of the above assessment impacts would be significant.</p>	No

Figure 3-2: Dwellings located in the vicinity of the proposed site



Characteristics of Potential Impacts – Screening Questions	Responses	Significant-Yes/ No
Would a large geographical area be impacted as a result of the proposed development?	No, the proposed site covers an area of 2.5 ha.	No
Would a large population of people be affected as a result of the proposed development?	No, the proposed development may have a slight negative temporary impact on a small population of people during the operational phase due to an increase in noise. There will be a long term slight positive impact on a moderate sized population of people due to the provision of burial ground services during the operational phase.	<p><b>Construction</b> Slight negative, brief to temporary in nature and not significant impacts from noise on small population.</p> <p><b>Operation</b> Long term slight positive effect as a result of burial services.</p>

Are any transboundary impacts likely to arise as a result of the proposed development?	No transboundary impacts are likely.	
Would the magnitude of impacts associated with the proposed development be considered significant?	No, the magnitude of impacts is not considered to be significant.	No
In considering the various aspects of the environment, would the impacts of the proposed development be considered complex?	No, the proposed development is small scale and is not considered to be complex.	No
Is there a high probability that the effects will occur?	No: temporary slight impacts as a result of noise and dust are anticipated, however, these are no expected to be significant.	No
Will the effects continue for a long time?	No, any effects will be temporary.	No
Will the effects be permanent rather than temporary?	No	No
Will the impacts be irreversible?	No	No
Will it be difficult to avoid, or reduce or repair or compensate for the effects?	No	No

**Conclusion:**

It is concluded that the characteristics of the potential impacts are not considered significant. There are no long-term negative impacts which can be associated with the project. Whilst temporary noise levels and disturbance are typical of any construction phase, the proposed works are generally remote from sensitive receptors and any potential impact will be short term and effectively managed through best practice measures. No impact interactions have been identified. No likely significant long-term or permanent negative environmental impacts have been identified in the course of the screening process.

**Reasoning:**

All works will be confined to the proposed 2.5 hectare site. The potential for any direct or indirect impact on habitats is low and the likelihood of any significant effects occurring as a result of the works can be excluded.

## 4 Conclusions and Recommendations

The proposed works are not a development for which EIAR is mandatory. It is also considered that the proposed development is not a sub-threshold development that requires an EIAR, however it was assessed against the relevant criteria and is considered unlikely to have 'significant effects on the environment'.

The relevant legislation requires EIAR for a number of classes of project that could potentially relate to the proposed development, however none were specific to a project such as the proposed cemetery extension at Kilcully.

An EIA Screening exercise was however carried out to determine the potential for the proposed development to have significant environmental effects or not. This exercise has been informed by an Appropriate Assessment Screening Report completed for the proposed development.

The nature or characteristics of the proposed development are not considered likely to have significant effects on the environment. The geographic extent of the final cemetery extension is small and there will be no long-term impacts.

All works will be confined to the 2.5 hectare site on which it is proposed. There are no watercourses within the site of the proposed development. The proposed works have been reviewed in the Appropriate Assessment Screening Report which has concluded that there will be no likelihood of significant effects on any European sites during the construction or operation of the proposed development. The characteristics of the potential impacts are not considered significant, as standard best practice will be adopted. No potential for cumulative impacts with other local planning applications or Part 8 planning applications, including the Kilcully Pedestrian Safety Scheme, has been identified. The overall conclusion of this screening exercise is that there is no specific requirement for an Environmental Impact Assessment Report of the proposed works.