



# **Environmental Impact Assessment Screening**

Proposed Residential Development at Port Road,  
Killarney

Portal Asset Holdings Ltd.

May 2024



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# Introduction

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## 1.1 Purpose of Statement

This Environmental Impact Assessment Screening has been prepared by HW Planning on behalf of Portal Asset Holdings to determine whether an Environmental Impact Assessment Report (EIAR) is required for a Large-scale Residential Development (LRD) at Port Road and St Margaret's Road, Coollegrean, Inch, Knockreer, Ardnamweely, Derreen (townlands), Killarney, Co. Kerry.

This statement should be read in conjunction with other application documents including the Statement of Consistency, Appropriate Assessment Screening/Natural Impact Statement, Ecological Report, Landscape Design Report with Landscape Visual Appraisal, Archaeological Impact Assessment, Site Specific Flood Risk Assessment and Construction and Environmental Management Plan.

Environmental Impact Assessment (EIA) is a procedure under the terms of European Directives on the assessment of the impacts of certain public and private projects on the environment. In accordance with the provisions 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) [the Regulations]. A mandatory EIA is required for developments which fall within the remit of Schedule 5.

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

Having regard to the above, the first step in the EIA process is to undertake a screening exercise to determine whether or not EIA is required for a particular project. This report considers same relative to European best practice guidance on such matters.

Article 4(4) of the Directive 2014/52/EU introduces a new Annex IIA to be used in the case of screening determinations. Annex IIA of Directive 2014/52/EU requires that the following information be provided by a developer in respect of projects listed in Annex II:

*"1. A description of the project, including in particular:*

*a) a description of the physical characteristics of the whole project and, where relevant, of demolition works.*

*b) a description of the location of the project, 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 project.*

*3. A description of any likely significant effects, to the extent of the information available on such effects, of the project on the environment resulting from:*

*a) the expected residues and emissions and the production of waste, where relevant.*

*b) the use of natural resources, in particular soil, land, water and biodiversity.*

*4. The criteria of Annex III shall be taken into account, where relevant, when compiling the information in accordance with points 1 to 3."*

Schedule 7 of the Regulations details the criteria the planning authority must consider in determining whether a sub-threshold EIA should be undertaken. 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. Accordingly, the pro-forma included as Appendix A in this report provides a screening statement of the proposed development against the Annex III criteria of 2014/52/EU.

## 1.2 Background to the EIA Screening

The EIA Screening is being prepared having regard to article 299B (1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018.

Article 299B (1)(b)(ii)(II) states the following:

*(II) there is significant and realistic doubt in regard to the likelihood of significant effects on the environment arising from the proposed development, it shall satisfy itself that the applicant has provided to the Board*

*(A) the information specified in Schedule 7A,*

*(B) any further relevant information on the characteristics of the proposed development and its likely significant effects on the environment, and*

*(C) a statement indicating how the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive have been taken into account.*

Article 299B(1)(c)

*The information referred to in paragraph (b)(ii)(II) may be accompanied by a description of the features, if any, of the proposed development and the measures, if any, envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment of the development.*

# Project Details

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## 2.1 Description & Characteristics of the Proposed Development

Portal Asset Holdings Ltd. intend to apply for planning permission for a Large-Scale Residential Development (LRD) at Port Road and St Margaret's Road, Coollegrean, Inch, Knockreer, Ardnamweely, Derreen (townlands), Killarney, Co. Kerry.

The proposed development will consist of 224 no. units comprising 76 no. two storey houses (8 no. 2 bed units, 38 no. 3 bed units and 30 no 4 bed units), 52 no. duplexes over 3 no. storeys (14 no. 1 bed units, 26 no. 2 bed units and 12 no. 3 bed units) and 96 no. apartments in 3 no. 4 no. storey buildings (16 no. 1 bed units and 80 no. 2 bed units), and a 2 no. storey creche (334 sq. m). Ancillary site works include public and communal open spaces, hard and soft landscaping, the relocation/undergrounding of ESB powerlines, wastewater infrastructure including foul pumping station, surface water attenuation, water utility services, public lighting, bin stores, bicycle stores, ESB substation, and all associated site development works.

Vehicular access to the development will be via a new entrance from Port Road. The proposed development includes upgrade works to Port Road, a pedestrian connection to Millwood Estate, and improvements to the stormwater network on St. Margaret's Road, as part of enabling infrastructure for the project.

## 2.2 Description of Location of Site

The subject site, which is c. 6.19 hectares in area, is located in the townlands of Coollegrean and Inch, Killarney in an area characterized by existing residential, social, institutional and recreational uses. The site is a currently a greenfield site, consisting of mainly pasture with some areas of scrub. Irregular in shape, the site is bounded to the north by mature residential development in the form of the Millwood and Coolegrean Estates; to the east by Killarney Nursing Home/Retirement Village, including associated Community Hospital and a recent 4 storey, assisted living apartment building; to the south by Kerry Education and Training Board (ETB) lands, as well as Presentation Monastery National School; and to the west by a row of residential properties fronting Port Road and Knockreer Park which forms part of Killarney National Park. The Folly Stream runs along the south and southwestern boundaries. It is proposed to access the residential development via a new estate entrance, onto Port Road.

The subject lands are zoned 'R1 – New/Proposed Residential Phase 1' in The Killarney Town Development Plan (Volume 2 of the Kerry County Development Plan 2022 – 2028) (CDP), in what is a designated 'Key Town' in Ireland's Southern Region. The site is situated in a sustainable location proximate to Killarney Town Centre to the south and National Park to the west.

The subject site is located within 2km of Killarney National Park, MacGillycuddy's Reeks and Caragh River Catchment SAC 000365 Special Protection Area (SPA) and the Killarney

National Park SPA. While there is no direct hydrological link there is potential for the proposed development to impact on the European Designations in terms of habitat loss, water quality impacts and disturbance or displacement to species within the SAC/SPA.

## 2.3 Environmental Sensitivities

### LANDSCAPE

While no specific landscape designations apply to the subject site and no scenic routes occur in its vicinity, glimpses of the site can be viewed from Port Road, adjacent to Knockreer Park which is a protected landscape. A Landscape Visual Appraisal is included in the accompanying Landscape Design Report prepared by Brady Shipman and Martin and is informed by a series of photomontages. It considers the proposed development to have a slight, neutral visual impact on the wider landscape, noting the following:

*The conversion of this green field site is likely to be perceived as a natural development in this urban environment.*

*The character of the residential properties adjoining the development will not be altered as they are currently located in the town built up area.*

*During construction, there will be moderate and negative impact on the character of the surrounding area due to the visual disturbance caused by construction. However, this will lessen once the scheme is operational and the planting mitigation measures establish and mature.*

### BIODIVERSITY & EUROPEAN SITES

The accompanying Ecology Impact Assessment prepared by Malachy Walsh and Partners notes that 'The habitats occurring within the subject site comprise mainly previously disturbed or managed habitats which are considered to be of 'local importance' (lower to higher value)'. The assessment considers the impact on hedgerow, treelines and wet grassland march habitats as a long-term slight positive effect at a local scale. Moderate and slight negative effects at a local scale are envisaged from the loss of stone wall, improved agricultural grassland, scrub habitats and riparian woodland habitat.

The Folly Stream is not an ecologically valuable watercourse, with no direct downstream connections. Potential water quality impacts are considered short-term, not significant and at a local scale, with no indirect impact on ecologically valuable aquatic habitats.

Potential impacts of the construction phase are considered on a range of faunal species. While the majority of these are short-term not significant negative the range of potential effects extends to medium-term moderate negative, the latter is in relation to badgers. Potential operational phase impacts range from temporary not significant negative to long-term moderate negative effects at a local scale, with local badger and bat populations impacted in particular. These potential impacts are addressed by way of best practice construction methodologies, and the residual impacts on biodiversity including impacts to designated sites, habitats, flora, fauna and water quality are not considered significant provided best practice methodologies and mitigation measures are employed during the construction and operational phases.

A number of young stands of invasive plant species were recorded within the site, most notably Japanese knotweed. These invasive species will be eradicated and controlled



within the site before the commencement of construction by deep burial in the northern section of the site. The CEMP includes an Invasive Species Management Plan prepared by Malachy Walsh and Partners for the site.

The subject site is located within 2km of Killarney National Park, MacGillycuddy's Reeks and Caragh River Catchment SAC (000365) and the Killarney National Park SPA (004038). Article 6.3 of the Habitats Directive 92/43/EEC requires that an Appropriate Assessment (AA) should be carried out where plans or projects may have a significant effect on the conservation objectives that would ultimately affect the integrity of Natura 2000 sites. A Stage One AA Screening Report has been prepared by Malachy Walsh and Partners.

European Designation	Code
Killarney National Park, MacGillycuddy's Reeks and Caragh River Catchment SAC	000356
Killarney National Park SPA	004038
Sheheree (Argagh) Bog SAC	000382
Castlemaine Harbour SAC	000343
Old Domestic Building Curraglass Wood	002041
Erik Bog SPA	004108

This examined the likelihood of significant effects to a European site arising from the proposed development based on several indicators including:

- Water quality and resource
- Habitat loss
- Habitat alteration
- Habitat or species fragmentation
- Disturbance and/or displacement of species
- Cumulative/in-combination effects:

The screening determined the need for a full appropriate assessment of the proposed development was required, as it could not be excluded, based on objective information, that the proposed development, individually or in combination with other plans or projects, would not have a significant effect on an SAC, in view of the site's conservation objectives. It was concluded that the proposed development is likely to have a significant

effect, or significant effects cannot be ruled out (at the screening stage) and in the absence of mitigation, on the following European site:

- Killarney National Park, MacGillycuddy's Reeks and Caragh River Catchment SAC (000365) (Killarney National Park SAC)

An Appropriate Assessment of the project is required and thus a Natura Impact Statement (NIS) has been prepared, which is a report of a scientific examination of evidence and data, carried out by competent persons to identify and classify any implications (ecological effects) for the SAC in the view of the conservation objectives of the site.

## **BAT ASSESSMENT**

A previous Strategic Housing Development (SHD) (ABP-312987-22 refers) at this site was refused by ABP on the basis that the accompanying Stage One AA Screening Report prepared by Malachy Walsh and Partners did not provide sufficient scientific reasoning to clearly eliminate the likelihood of significant adverse effects on the Lesser Horseshoe Bat as a result of increased artificial lighting. Consequently, in view of the conservation objectives for Killarney National Park, MacGillycuddy's Reeks and Caragh River Catchment SAC, ABP concluded that adverse effects to the integrity of the SAC could not be ruled out.

To address this issue in the current application the following measures have been adopted:

- The inclusion of Licensed Bat Specialist Dr Tina Aughney in the project team. She is heavily involved with Bat Conservation Ireland and is a foremost bat expert in the country. Dr. Aughney has now prepared a specialist paper on the potential for impacts on the LHSB which has been incorporated into the AA/NIS reporting;
- Additional bat survey work has been completed and discussions/consultations have taken place with NPWS/DAU at local /regional level via regional ecologist Jervis Goode and Daniel Buckley, Conservation Ranger. A report in relation to the Supplementary Bat Survey is included with this application.
- Following liaison with the National Parks and Wildlife Service (NPWS) an indicative planting scheme within the National Park lands was agreed to mitigate against any light spill arising from vehicles on the proposed access road. Notwithstanding the fact that the lands are outside of the project area, the applicant supports the proposed application of a special contribution levy to facilitate the NPWS to deliver the planting.
- Informed by input from the ecologists, a new lighting scheme has been developed for Port Road which demonstrates an improvement on the existing ('do nothing') scenario in respect of light spill into Killarney National Park. This could be implemented alongside the committed upgrades to Port Road.

The enclosed Public Lighting Design Assessment prepared by a lighting specialist<sup>1</sup> with MHL and Associates and provides a comprehensive assessment of the existing and

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<sup>1</sup> David Muphy of MHL and Associates is a Member of the Institution of Lighting Professionals (MILP) and a Member of Engineers of Ireland (MIEI). He has extensive experience designing lighting designs for commercial and residential development sectors for 10 years, through the use of Lighting Reality Pro V2.3.0.

proposed public lighting designs, in relation to conformance with lighting standards and best practice. Working in conjunction with Malacy Walsh and Partners, the project ecologists, and Dr Tina Aughney, Bat Eco Services, the proposed public lighting has been designed to have regard to potential impacts on light-sensitive ecological receptors, in particular the lesser horseshoe bat and other bat species recorded in the vicinity.

Engagement has taken place with lighting personnel in Kerry County Council and the existing lighting on Port Road has been modelled. Based on modelled data and ecological input lighting modification are proposed along the site's frontage onto Port Road, with existing lighting being moved to the western side to reduce lighting spill, and replacement luminaires being installed in line with the BCT (2023) specifications. It is proposed that this can be implemented in tandem with proposed pedestrian upgrades along Port Road. Modelled output for these modifications demonstrate an improvement on the existing ('do nothing') scenario in respect of light spill into Killarney National Park.

The modelled Lux contour lighting extents from the proposed residential development indicate that light spill will be contained within the development site. However mitigation measures in terms of lighting specifications in accordance with the Bat Conservation Trust (2023) 'Bats and artificial lighting at night', Guidance Note GN08/23 have been incorporated into the proposed public lighting design. Further mitigation in the form of off-site planting, to bolster gaps in the National Park bat commuting corridor have been agreed with the NPWS and can be achieved by way of a special contribution condition.

Dr Aughney's report concludes that *'the strict implementation of these measures will ensure that the proposed development will not result in any significant adverse effects on the local lesser horseshoe bat population in Killarney National Park.'*

## **TRAFFIC IMPACT**

The subject lands are located east of Port Road. Possible operational stage impacts include the generation of unacceptable levels of congestion and queuing at site entrance, as well as the endangering of public safety by reason of traffic hazards arising from the development. The potential for operational traffic to impact human health from increased volumes and associated road safety implications is addressed in the accompanying Traffic and Transportation Assessment and Road Safety Audit prepared by MHL and Associates Consulting Engineers. The Report concludes that:

*'the proposed development will result in a minor increase in traffic volumes at the adjoining junction and will not have a significant effect on the road capacity of the local road network. Upgrade improvements works at the Ballydowney Roundabout will need to be undertaken regardless of this development to ensure future development of the Killarney town area lands is not stifled by substandard road infrastructure, allowing the town to develop and prosper for the future years to come.'*

Alongside this, the construction phase has the potential to increase traffic congestion and/or public safety hazard, with the significance of impacts likely to be moderate without appropriate mitigation. Please refer to Construction & Environmental Management Plan prepared by MHL and Associates Consulting Engineers.

## FLOOD RISK

A Stage 2/3 Site-Specific Flood Risk Assessment was carried out by Donal Moynihan, Chartered Engineer, and concludes the following:

- Rivers are the primary cause of flooding in the Killarney Area, with flood events attributed to fluvial sources ranging from the major rivers, including the River Deenagh.
- The primary sources of fluvial flooding associated with Port Road/Demense area are the river Deenagh and associated streams and watercourses. The main risk of flooding at this upstream location arises from blockages to the culvert that crosses New Road.
- The most notable feature associated with the assessment site regarding Infrastructure, Drainage Systems and associated watercourses is the folly Stream which runs along the Southern boundary of the site...the Folly Stream Channel capacity exceeds the 1% AEP Flow rate and the stream will be able to accommodate this flow without overtopping the stream banks.
- In the Stage 1 Flood Risk Identification, it has been established that there is a very low potential risk of flooding of the site and that the Assessment site is located in Zone C.
- The type of development is defined as 'Highly Vulnerable Development'. The nature, area and extent of development are small in nature. The Flood Risk Impact on the section of the Development located in flood Zone C is therefore low. The flood risk impact will be minimised by the use of construction techniques as set out previously in this assessment and by maintaining existing ground levels on the site.
- Based on the SSFRA Stage 2/3 there is no flood risk attributable to this Residential Development and therefore no associated impact.
- The proposals that are to be employed regarding Surface Water Management will minimise any adverse effect possibly created by the development with regard to the existing drainage characteristics and will provide onsite storage for any run off associated with the development to achieve a "Greenfield" approach to the solution for the site.

## HERITAGE

The current or most recent use of the subject lands is as agricultural pastureland. A possible barrow site (KE066-066) listed in the Record of Monuments and Places (RMP) is located in the south western corner of the proposed development site. A barrow is an artificial mound of earth or earth and stone. These are part of the Bronze/Iron Age burial tradition dating from c. 2400 BC to AD 400. The feature is not visible at ground level, nor is it marked on the OS maps, but is visible as a shadow site in an aerial photograph taken in 1956 (ACAP, V 245/96-7).

An Archaeological Impact Assessment has been prepared by John O'Connor who also carried out test excavation of the subject site in 2017, licence no. 17E0274. As the enclosed Test Excavation Report indicates a number of discrete features were noted as

part of the excavation, however, no evidence of a barrow was revealed and none of these features yielded datable artefacts. Notwithstanding this the proposed layout incorporates a minimum of a 10m buffer area around the perimeter of the 20m diameter feature. Rubicon Heritage have prepared the enclosed Proposed Management Plan for Recorded Monument KE066-066. This sets out that a construction methodology will be agreed with the County Archaeologist prior to commencement and proposes the erection of temporary hoardings around the feature during construction and monitoring by a suitably qualified archaeologist during construction within the monument's statutory zone of notification. During the operational phase the green buffer is to remain unplanted and undisturbed with a public information board being erected.

While there are no National Inventory of Architectural Heritage (NIAH) structures on the subject site there are three structures along the western boundary of the site along Port Road and two on the southern boundary comprising 19<sup>th</sup> Century dwellings and a convent.

It is considered that there will be limited visual impact on these properties having regard to the existing intervening and mature hedrows in a number of area and proposals to supplement existing boundaries by means of additional tree and hederow planting. This, coupled with the incorporation of setbacks and appropriate design of built form will ensure there are no impacts on adjoining amenities.

The Landscape Visual Appraisal section of the enclosed Landscape Design Report prepared by Brady Shipman and Martin, support this view. It is noted in Appendix 1, however, that there is the potential for a highly localised and narrow filtered view between mature trees at the south west corner of the the site and the graden to the rear of the Port Cottage at the southern end of the row. As the section in Figure 1 indicates, this will be addressed by the proposed boundary treatment and proposed bolstering of the native tree and scrub planting at this point.

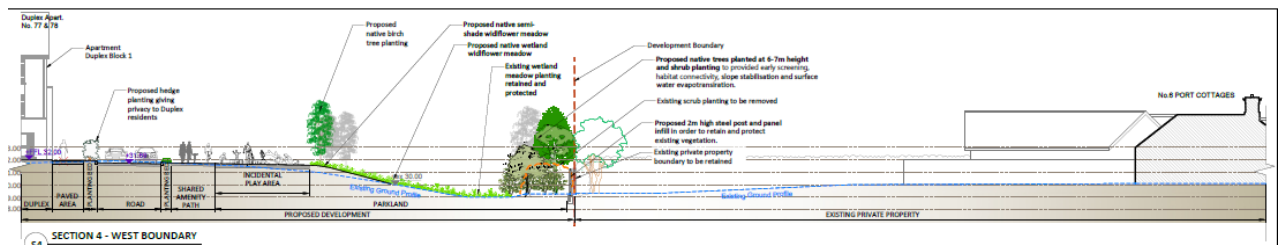


Figure 1 - Section 4 – Extracted from Boundary Sections Drawing prepared by Brady Shipman Marting

## SOIL

The Geological Survey of Ireland (GSI) classes the predominant area of the site as having a high groundwater vulnerability rating, comprising a regionally important sand and gravel aquifer overlain with well-drained soil in an area of Dinantian Upper Impure Limestone bedrock. The groundwater vulnerability of the southern boundary of the site is classes as extreme. GSI state that “Vulnerability is a term used to represent the intrinsic geological and hydrogeological characteristics that determine the ease with which groundwater may be contaminated by human activities”. The GSI further describes that the vulnerability of groundwater depends on:

- The time of travel of infiltrating water (and contaminants).
- The relative quantity of contaminants that can reach the groundwater; and

- The contaminant attenuation capacity of the geological materials through which the water and contaminants infiltrate.

The FRA that supports this application concludes that groundwater flooding is not considered to be a significant flood risk. As the Landscape Plan prepared by Brady Shipman Martin indicates however, existing wetland vegetation to the south of the site is to be retained and protected in a wet meadow area along the Folly Stream, with pockets of wetland biodiversity as part of the Green Link landscape area.

## CUMULATIVE IMPACTS

This screening assessment has also considered potential cumulative impacts that could arise from the proposed development in combination with other known projects in the area. A desktop review of other local projects in the vicinity was undertaken using Kerry County Council planning enquiry systems, the results of which are summarised below.

Reference	Applicant	Address	Date Received	Description
231002	Fergal And Sharon Murphy	No. 5 Port Cottages, Inch/Coollegrean, Killarney. Co. Kerry	15/9/2023	(1) Construct extension to existing shed/store for use as a home gym/home office, all in accordance with plans and particulars submitted
23305	Orbvin Parklands Development Limited	Port Road , Dereen, Coollegrean, Killarney	22/03/2023	An application to construct 9 dwelling houses with all associated site works adjacent to the north of this application's proposed site entrance off Port Road
19813	Kerry Education and Training Board	Killarney Community College, New Road Killarney	20/06/2020	Construction of a 2 classroom ASD unit with ancillary accommodation, a resource room, internal alterations to the existing school building, external signage, additional car parking and all associated site works
19102	Gerard Murphy, Chairperson B.O.M. Presentation Monastery N.S.	The Presentation Monastery , New Road , Killarney	6/2/2019	For the construction of a single storey extension and alterations to the rear of the existing school (providing a new two classroom special needs unit, relocated general purpose hall and ancillary accommodation), and all associated service and site works
18170	Axinite Investments Ltd	Coollegrean Killarney Co Kerry Coollegrean	22/04/2018	Retain the removal (in February 2014 due to storm damage), of 7 penthouse apartments in the completed assisted living apartment block (pl. Ref 07/4675)

11295259	Avril O'Connell	Port Road Killarney Killarney	28/07/2016	Extension of Duration - construction of a two-storey dwelling house with attic conversion and all associated site works
11295260	Derval O'Connell	Port Road Killarney Killarney	28/07/2016	Extension of Duration - construction of a two-storey dwelling house with attic conversion and all associated site works
151056	Daniel And Lisa Ryan	3 Port Cottages Port Road Killarney Co Kerry Inch	30/01/2016	The work will consist of provision of new vehicle entrance and parking bay to the front, reconfiguration of front porch to provide main entrance door to the front and windows on both sides of the porch, replacement of windows on front elevation, demolition of existing extension and construction of new extension to the rear. This is a protected structure
15961	The Estate Of Tom Wallace, C/O Chris Quill Co-Executor	36 Millwood Saint Margaret's Road Coollegrean Killarney, Co Kerry Coollegrean	05/01/2016	Retain elevational changes to house as constructed
8294908	Specific Assets of John Shee & Joe Hanrahan & Colm, Denis & Jeremiah Galvin (In Receivership)	Coollegrean Killarney, Co. Kerry Killarney	17/04/2014	Extension Of Duration - Construction of 43 no. Dwellings (consisting of 19 no detached houses, 18 no. Terraced houses and 6 no. Courtyard houses) and 14 no. Own-door apartments; E.S.B sub-station and associated site and landscape works, access roads and ancillary development in relation to this development and to the future development of the remainder of the site.
07204675	Mowlam Residential Care Ltd	Coolegrean Killarney Killarney	5/10/2007	the development of an integrated Retirement Village consisting of 56 bed Nursing Home 2-storey & partial semi-basement with ancillary services; 66 units Assisted Living Apartment Building half 2-storey and half 3-storey, the latter with penthouse and semi-basement consisting of 48 single bedroom apartments and 18 2-bedroom apartments, Communal Lounge and one Day Care Centre; 15 units Independent Living Housing consisting of 7 no. 2-bedroom single storey houses, 5 no. 2-bedroom dormer and 3 no. 1-bedroom single storey houses; new entrance off existing Cluid access road, new ESB substation, 3 no. LPG tanks and associated site works

Table 2.1 Nearby Permitted Development (Between 2007 – 2024)

## 2.4 Description of Aspects of the Environment likely to be affected by the project.

The most significant possible negative impacts on the environment, without appropriate mitigation measures in place, are likely to be:

- Construction traffic contributing to traffic congestion and road safety hazards on the local road network.
- Additional traffic on local road network once scheme is operational.
- Adverse health and amenity impacts arising from noise pollution during demolition and construction phase.
- Potential to damage unrecorded, sub-surface archaeological features that may exist on the subject site.
- Possible landscape and visual impacts.
- Potential for increased flood risk in adjoining areas due to addition of hard standing areas.
- Increased demand on recreation and amenity services in the vicinity.
- Possible impacts on fauna, in particular from lighting, on the bat population.
- Possible impacts on the badger population on-site, through disturbance from lighting, noise, human activity and loss of habitat.
- Possible impacts include a risk of inadequacy or malfunction of the sewage system resulting in contamination, odour and potential human health impacts. A lack of capacity in the water or sewer network, could result in a lack of supply to residential units.

These matters have been considered in full as part of the design and assessment of the subject proposal, with a range of positive measures produced in response, including:

- Provision of detailed Landscape Design Proposals.
- Preparation of Daylight Reception and Sunlight Reception Reports.
- Provision of an AA Screening, Natura Impact Statement Report and Ecological Impact Assessment Report.
- Provision of a Badger Survey Report.
- Provision of a Supplemental Bat Survey.
- Provision of a Traffic and Transport Assessment and Road Safety Audit.
- Preparation of a Site-Specific Flood Risk Assessment.
- Preparation of Archaeological Impact Assessment and Testing Report.
- Preparation of a Construction and Environmental Management Plan.
- Preparation of a Landscape Design Report and Landscape Visual Appraisal.

## 2.5 Expected Residues / Emissions / Production of Waste

It is expected that there will be some normal residues/emissions during the construction stage. Standard dust and noise prevention reduction measures as per the majority of planning applications of all scales will be employed and monitored. As such, pollution and nuisances are not considered likely to have the potential to cause significant impacts on



the environment. Construction will be guided by a Construction and Environmental Management Plan. There will be some waste produced in the construction of the proposed scheme, but this will be subject to normal controls. It will be disposed of using licensed waste disposal facilities and contractors. The scale of the waste production in conjunction with the use of licensed waste disposal facilities and contractors does not cause concern for likely significant impacts on the environment. During the operational phase, everyday waste and recycling from residential dwellings will be disposed of by approved licensed waste disposal contractors. There are no significant mitigations measures or methods to be undertaken in order to reduce likely significant impacts on the environment in order to complete the proposed scheme. Any measures to manage noise, dust and/or pollution during the construction and operational phases are subject to standard policies and practices.

## **2.6 Use of Natural Resources – Soil / Land / Water / Biodiversity**

There will be no significant likely impacts on the environment in relation to natural resources in the area. The main use of natural resources will be land. However, the land is in an urban context. The scale of natural resources used both in construction and operation is not such that would cause concern in terms of significant likely impacts on the environment. The development will not result in high demand for water use.

As concluded in the enclosed Natural Impact Statement, following mitigation, there is no likelihood of significant effects, either individually or cumulatively, arising from the proposed LRD that would undermine the conservation objectives of the Killarney National Park, MacGillycuddy's Reeks and Caragh River Catchment SAC (000365), or affect the integrity of the site.

# Assessment of EIA Requirement

## 3.1 Schedule 5 Criteria

Article 93 and Schedule 5 of the 2001 Planning and Development Regulations 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 Schedule 5 of the Planning and Development Regulations, 2001 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 for residential housing, a creche and ancillary works 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:

- At 6.19 ha, the site area is below the threshold that would trigger a mandatory EIA. The proposed development provides for upgrade works to Port Road and improvements to the stormwater network on St. Margaret's Road, as part of enabling infrastructure for the project. The residential developable area is 4.75 ha and less than the overall 6.19 ha site area.
- At 224 the number of individual residential units falls below the threshold of 500 dwellings.

## 3.2 Schedule 7 Criteria

Schedule 7 of the Regulations details the criteria the planning authority must consider in determining whether a sub-threshold EIA should be undertaken. 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. Accordingly, the following provides a screening statement of the proposed development against the Annex III criteria of 2014/52/EU.

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# **Appendix A – Schedule 7 Screening Summary**

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# Construction Phase

Criteria for assessment of EIA sub-threshold	Impacts during Construction Phase
<p><b>1. Characteristics of proposed development</b> The characteristics of the proposed development, in particular</p>	
<ul style="list-style-type: none"> <li>- The size of the proposed development</li> </ul>	<p>The site area is 6.19 ha, while the residential developable area is 4.75 ha. It will be constructed on a phased basis over a period of 42 months. The construction works themselves will be confined to the site and will be informed by a Construction and Environmental Management Plan to mitigate potential impacts.</p> <p>The proposed development also includes measures to provide upgrade works to Port Road and improvements to the stormwater network on St. Margaret's Road, as part of enabling infrastructure for the project. These works will be guided by appropriate construction, environmental and health and safety measures to ensure no impact to existing populations.</p> <p>No significant impact likely.</p>
<ul style="list-style-type: none"> <li>- The cumulation with other proposed development</li> </ul>	<p>This screening assessment has also considered potential cumulative impacts that could arise from the proposed development in combination with other known projects in the area. A desktop review of other local projects in the vicinity was undertaken using Kerry County Council planning enquiry system. The permission has lapsed or the development has already been completed in the vast majority of these projects. Of the few remaining live permissions most are not significant in scale and relate to extensions to private dwellings.</p> <p>The only application that could potentially result in cumulative impacts with the proposed development is application 23305 for the construction of 9 no. dwelling houses with all associated site works further north along Port Road. The Council's decision on this application is due on the 22/05/2024. Notwithstanding the proximity of the site, it is not considered that significant cumulative</p>

	<p>construction impacts would arise due to the relatively small number of units involved.</p> <p>The lands immediately south of the site are included within the town centre are of Killarney while the lands immediately north and east of the site are existing residential areas. The site therefore comprises of a greenfield urban infill site with the lands around the site already developed. Any potential other development under construction at the same time as the proposed will therefore be relatively small in nature. However, to avoid any significant impacts the mitigation measures contained in the prepared Construction and Environmental Management plan will address such a scenario.</p> <p>No significant impact likely.</p>
<p>- The Nature of any demolition works</p>	<p>There are no proposed demolition works associated with the development. The upgrade works on Port Road and St Margarets Road will be subject to general road based construction methods.</p> <p>No significant impact likely.</p>
<p>- the use of natural resources, in particular land, soil, water and biodiversity</p>	<p>Energy, including electricity and fuels, will be required during construction phase. Rock and soil resources to be excavated. Construction will use various raw materials typical of the construction of residential estate developments. The proposal has been designed to allow for the retention of most of the existing hedgerow layout, with only short sections being directly affected by the project. It will also involve removal of overgrown scrub including Willow bushes and Gorse to the south and 9 no. trees. The latter will predominantly be removed to facilitate the new entrance and comprise trees that are of a relatively low value due to the effects of disease (refer to Landscape Plan and Tree Survey Report prepared by Brady Shipman Martin). Considerable numbers of new trees will be planted as part of the landscaping plan for the new development, this will include significant re-enforcement planting along the western and north-western boundary areas, alongside the new entrance road and across the interior of the site. This new planting will result in a net gain in tree numbers across the site. Biodiversity corridors will be retained with the use of exclusion zones around existing badger sett and supervision of works by a project ecologist during the construction phase employed to mitigate potential</p>

	<p>impacts of the works on badgers. No out of the ordinary use of natural resources is likely during the construction process.</p> <p>No significant impact likely.</p>
- the production of waste	<p>Waste will be generated during the construction phase and these will be typical of development of this nature. The Construction and Environmental Management Plan includes provisions for handling waste in full accordance with statutory legislation and associated guidance. This includes a suite of focused management measures related to objectives contained in the Southern Region Waste Management Plan 2021.</p> <p>No significant impact likely.</p>
- pollution and nuisances	<p>Development of site will increase traffic in the area for the duration of the construction phase. Temporary noise, dust and vibration impacts, as well as any potential for water pollution, will be addressed as part of standard best practice controls.</p> <p>No significant impact likely.</p>
- 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	<p>No significant risks on the proposed development site are foreseen, subject to strict compliance with standard environmental controls.</p> <p>No significant impact likely.</p>
- the risk to human health (for example due to water contamination or air pollution)	<p>Additional noise and dust from temporary construction works may be experienced by residents and other property users in the vicinity. This can be effectively managed, having regard to the nature of the project and measures proposed in the Construction and Environmental Management Plan. On completion of works, noise and dust levels will return to background levels. Standard water control measures will ensure that run-off of sediment or other pollutants will not enter the watercourse therefore the proposed project will not have any impact on water quality.</p> <p>No significant impact likely.</p>
<b>2. Location of proposed development</b>	

The environmental sensitivity of geographical areas likely to be affected by proposed development, having regard to:

- the existing land use

The site has most recently been in agricultural use, however it is zoned for residential development. Its proposed development is consistent with the land use objective.

No significant impact likely.

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

The site is not located within but is proximate to statutory designated areas consisting of the Killarney National Park, MacGillycuddy's Reeks and Caragh River Catchment SAC (000365) and the Killarney National Park SPA (004038).

An Appropriate Assessment (AA) Screening Report and a Natura Impact Statement (NIS) Report have been prepared to actively consider the potential for adverse impacts on qualifying interests, arising from the construction phase.

There is no hydrological link between the site and the SAC/SPAs. The AA Screening and NIS conclude that the designated areas are not likely to be significantly impacted by the proposed development.

The Folly Stream adjoining the site has the potential to convey construction stage surface-water run-off off-site. While surface-water run-off associated with the construction stage will generally percolate to ground, standard environmental controls will nonetheless be implemented as part of the project to ensure the appropriate management and control of surface water run-off potentially arising from development activities at the site.

No significant impact likely.

- the absorption capacity of the natural environment, paying attention to the following areas:

- (a) wetlands,
- (b) coastal zones,
- (c) mountain and forest areas,

The site is not located within, however, it is in the vicinity of a statutory designated area. These consist of the Killarney National Park, MacGillycuddy's Reeks and Caragh River Catchment SAC (000365) and the Killarney National Park SPA (004038). An Appropriate Assessment (AA) Screening Report and a Natural Impact Statement (NIS) Report have been prepared to actively consider the potential for adverse impacts on qualifying interests,



- (d) nature reserves and parks,
- (e) areas classified or protected under legislation, including special protection areas designated pursuant to Directives 79/409/EEC and 92/43/EEC,
- (f) areas in which the environmental quality standards laid down in legislation of the EU have already been exceeded,
- (g) densely populated areas,
- (h) landscapes of historical, cultural or archaeological significance

arising from the construction phase. The findings of the report have determined that construction of the proposed development will not adversely impact on natural resources.

The construction phase will not interfere with any of the areas listed opposite. There is an area of march (GM1) habitat recorded in the habitat survey in the enclosed Ecology Impact Assessment (EclA) Report, prepared by Malachy Walsh and Partners. This is adjacent to the Folly Stream. The EclA considers it to be the result of the drainage conditions in that specific part of the site rather than from ground water concludes that it is not particularly species rich. However, this has been incorporated into the Green Link in the Landscape strategy in the accompanying Landscape Design Report with an objective to protect and enhance the existing wet meadow character.

A possible barrow site (KE066-066) listed in the Record of Monuments and Places (RMP) is located in the south western corner of the proposed development site. This feature is not visible at ground level, nor is it marked on the OS maps, but is visible as a shadow site in an aerial photograph taken in 1956 (ACAP, V 245/96-7).

An archaeological assessment complete with test excavation survey has been undertaken which concluded that no evidence of a barrow was revealed, and no features were excavated that yielded datable artefacts. Notwithstanding this, the proposed layout incorporates a buffer from the perimeter of the site and it is proposed that specific works areas attedant to this are monitored by a suitably qualified archaeologist during the construction phase.

Best practice standards, environmental guidelines measures will be adhered to during the construction phase in order to avoid potential impacts on natural resources and likely significant impacts are not anticipated.

The site is presently in agricultural use however, it is surrounded by an existing populated area. Any interaction with the existing population can be effectively managed, having regard to the nature of the project and measures proposed in the Construction and Environmental Management Plan. On completion of

	works, noise and dust levels will return to background levels.  No significant impact likely.
<b>3. Types and Characteristics of potential impacts</b> The potential significant effects of proposed development in relation to criteria set out under paragraphs 1 and 2 above, and having regard in	
- the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected)	The site is located near a number of urban road junctions. A Construction Traffic Management Plan will be put in place prior to commencement of development at the site to mitigate any potential negative impacts on traffic flow.  No significant impact likely.
- the nature of the impact	Potential for the environment to be impacted negatively during the construction phase by way of traffic disruption, noise and dust issues etc. Any impacts will be localised and temporary in nature and are not deemed to be significant. These will be proactively managed via standard environmental protection measures.  No significant impact likely.
- the transboundary nature of the impact	No significant impacts arising from construction of the development.
- the intensity and complexity of the impact	The intensity and complexity of the construction phase is in keeping with modern construction projects.  No significant impact likely.
- the probability of the impact	Some level of construction impacts is highly probable, but these will be mitigated by standard best practice techniques identified in the Construction and Environmental Management Plan.  No significant impact likely.
- the expected onset, duration, frequency and reversibility of the impact.	The construction phase of the development is expected to commence within approximately 6 months of any grant of permission. Any impacts will be short-term and restricted by planning conditions in terms of the hours of operation. No permanent negative impacts are

	<p>anticipated as a result of the construction phase of the project.</p> <p>No significant impact likely.</p>
<ul style="list-style-type: none"> <li>- 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.</li> </ul>	<p>There is potential for impacts caused by one as of yet unknown project to combine with the subject proposal to give rise to a cumulative effect. This will be considered in full as part of the final pre-commencement Construction and Environmental Management Plan and the potential for such unforeseen impacts will be mitigated accordingly as part of focused response measures.</p> <p>No significant impact likely.</p>
<ul style="list-style-type: none"> <li>- The possibility of effectively reducing the impact</li> </ul>	<p>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.</p> <p>No significant impact likely.</p>

## Operational Phase

Criteria for assessment of EIA sub-threshold	Impacts during Operational Phase
<p>1. Characteristics of proposed development</p> <p>The characteristics of the proposed development, in particular</p>	
<p>The size of the proposed development</p>	<p>The site area is 6.19 ha, while the residential developable area is 4.75 ha. The development will change the use of the land from agriculture to residential which is consistent with the zoning of the site. The developed design has been tested relative to key policy and guidelines, as well as landscape and visual considerations. Collectively, the size and design of the</p>

	<p>project will deliver significant positive benefits relative to the 'do-nothing' scenario including:</p> <ul style="list-style-type: none"> <li>• Delivery of Housing.</li> <li>• Improved Connectivity.</li> <li>• Road safety enhancements through introduction of pedestrian crossings.</li> <li>• Biodiversity enhancements through bolstering of existing hedgerows, new tree planting and retention of wetlands.</li> </ul> <p>No significant impact likely.</p>
<p>the cumulation with other proposed development</p>	<p>This screening assessment has also considered potential cumulative impacts that could arise from the proposed development in combination with other known projects in the area. A desktop review of other local projects in the vicinity was undertaken using Kerry Council planning enquiry system. The remaining live permissions are relatively minor in nature and relate to extensions to private dwellings.</p> <p>The proposed uses are consistent with the land use zoning of the site and compatible with adjacent land-uses, as enshrined in adopted planning policy. The development will positively integrate with other plans and projects once operational.</p> <p>No significant impact likely.</p>
<p>the use of natural resources, in particular land, soil, water and biodiversity</p>	<p>Water, consumption of electricity, energy related to the proposed residential and creche uses. No out of the ordinary use of natural resources is likely during the operational phase.</p> <p>No significant impact likely.</p>
<p>the production of waste</p>	<p>The accompanying Operational Waste Management Plan prepared by MHL and Associates highlights measures to avoid and / or reduce pollution from operational waste. With these measures in place no significant negative impacts are likely. Domestic and commercial waste will be generated from the development, the disposal of which will be informed by a waste/refuse management strategy for the site. Related practices are unlikely to cause unusual, significant or adverse impacts.</p>

	No significant impact likely.
pollution and nuisances	<p>The site has most recently been in agricultural use with associated agricultural related vehicular movements. The proposal will give rise to an increase in traffic and visitor numbers to/from site. Suitable provision has been made for pedestrian and cycle infrastructure, to connect the site to nearby local centres, to offset vehicular trips.</p> <p>The accompanying Operational Waste Management Plan highlights measures to avoid and / or mitigate pollution from operational waste.</p> <p>Surface water management proposals for the site have been designed in accordance with best practice measures including SuDS measures.</p> <p>No significant impact likely.</p>
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	<p>None foreseen, subject to compliance with building and fire regulations.</p> <p>No significant impact likely.</p>
the risk to human health (for example due to water contamination or air pollution)	<p>None. The development will not involve the use, storage, transport, handling or production of substances or materials which could be harmful to people and the environment. It is considered that this proposal has the potential to have a long-term beneficial impact on human health as a consequence of facilitating sustainable urban development incorporating communal and private open space areas on lands zoned for residential development.</p> <p>No significant impact likely.</p>
2. Location of proposed development	
The environmental sensitivity of geographical areas likely to be affected by proposed development, having regard to:	
the existing land use	<p>The site has most recently been in agricultural use, however, the proposed use is consistent with surrounding existing uses and the site zoning as outlined in the Kerry County Development Plan 2022 - 2028. The proposal will develop an important site, consistent with the zoning. The site has been zoned for residential development for a significant period of time and the</p>

	<p>proposal will develop an important site, bringing it into active residential use.</p> <p>No significant impact likely.</p>
<p>the relative abundance, quality and regenerative capacity of natural resources in the area</p>	<p>The proposed operational phase will not have any out of the ordinary impact on natural resources.</p> <p>No significant impact likely.</p>
<p>the absorption capacity of the natural environment, paying attention to the following areas:</p> <p>wetlands,</p> <p>coastal zones,</p> <p>mountain and forest areas,</p> <p>nature reserves and parks,</p> <p>areas classified or protected under legislation, including special protection areas designated pursuant to Directives 79/409/EEC and 92/43/EEC,</p> <p>areas in which the environmental quality standards laid down in legislation of the EU have already been exceeded,</p> <p>densely populated areas,</p> <p>landscapes of historical, cultural or archaeological significance</p>	<p>Proposed use is compatible with the geographical area and zoning, as well as other policy intentions for the area.</p> <p>The high-quality architectural design will contribute to the urban landscape. The retention of much of the existing hedgerows and trees in addition to the further provision of trees and landscaping planting will assimilate the development in its local context and contribute towards an attractive environment.</p> <p>A possible barrow site (KE066-066) listed in the Record of Monuments and Places (RMP) is located in the south western corner of the proposed development site. Detailed archaeological site investigations were undertaken, and test trenches revealed no evidence of a barrow. The development will therefore have no significant effect on sub surface archaeological features.</p> <p>Notwithstanding this, and at the request of the county archaeologist, the proposed layout incorporates an additional buffer area around the site, with the application supported by an Archaeological Management Plan prepared by Rubicon Heritage in relation to this feature.</p> <p>The provision of a landscaped biodiversity area to the south of the site, tree planting and other landscaping treatments will assimilate the development in its local context and contribute towards an attractive environment.</p> <p>Once developed the site will become an integrated part of the urban area consistent with the zoning objectives for the site.</p> <p>No significant impact likely.</p>
<p>3. Characteristics of potential impacts</p>	

<p>The potential significant effects of proposed development in relation to criteria set out under paragraphs 1 and 2 above, and having regard in</p>	
<p>the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected)</p>	<p>The site area is 6.19 ha, of which the developable area is 4.75 ha. and is sub-threshold for the purposes of EIA [Schedule 5, Part 2, Section 10 (b)(iv) of 2001 Planning and Development Regulations]. Development will be compatible with its urban context and consistent with zoning objectives.</p> <p>A Landscape Visual Appraisal has been prepared as part of the Landscape Design Report that accompanies the proposal. The findings confirm that the development will have a slight, neutral visual impact on the wider landscape, with its proximity to schools and the town centre mitigating any impact from the intensification of the site. As the development comprises of an urban site within the town boundary, it will not be visible over a wide area.</p> <p>The existing population likely to be impacted will be residents of the existing residential developments in the immediate vicinity of the site. However, as this is zoned residential land within an urban area and as such the proposed land use is appropriate and will be compatible with the existing surrounding uses. Increased permeability and enhanced amenity spaces will benefit the existing population.</p> <p>No significant impact likely.</p>
<p>the nature of the impact</p>	<p>Expected benefits to physical, micro and macro environments fostering the envisaged growth in Killarney. The impacts will be generally positive in nature.</p> <p>No significant impact likely.</p>
<p>the transboundary nature of the impact</p>	<p>Given the scale and nature of the proposed development and the remoteness from the nearest E.U. Member state, no transboundary impacts are expected.</p> <p>No significant impact likely.</p>
<p>the intensity and complexity of the impact</p>	<p>The proposed development, by its nature will be of low intensity and complexity and the impact of the development will be moderate and will actively managed.</p>

	No significant impact likely.
the probability of the impact	<p>The operational phase will inevitably change the local environment. Measures will be in place to avoid, reduce, or mitigate any likely negative impacts.</p> <p>No significant impact likely.</p>
the expected onset, duration, frequency and reversibility of the impact.	<p>Once constructed, the proposal will result in landscape and visual impacts that will be permanent and non-reversible. These have been assessed as part of a Landscape Visual Appraisal and have been deemed acceptable.</p> <p>No significant impact likely.</p>
cumulation of the impact with the impact of other existing and/or approved projects.	<p>The development of the subject site is supported by adopted Development Plans and policy objectives which have been subject to Strategic Environmental Assessment. The environmental effect of the proposed development has already been adjudicated on and it has been determined that the types of intended development would be appropriate relative to the subject site and adjacent areas. It is anticipated that the subject proposal will provide for important synergistic and cumulative benefits in the wider area.</p> <p>No significant impact likely.</p>
The possibility of effectively reducing the impact	<p>The proposal is being shaped by a number of proactive design measures to reduce the potential for any negative impacts. This includes the promotion of sustainable travel patterns and the inclusion of Sustainable Urban Drainage Systems. The proposal also includes extensive planting to foster and develop the existing parkland character and enhance biodiversity in the area.</p> <p>It has been objectively concluded that the proposal will provide for long-term beneficial impacts of varying degrees.</p> <p>No significant impact likely.</p>

**SCHEDULE 7 SCREENING CONCLUSION**



Based on the information provided in accordance with Annex IIA and Annex III of the 2014 Directive, it is considered that a sub-threshold EIA is not required for the proposed development, as adequate measures are in place to avoid, reduce or mitigate likely impacts, such that neither the construction nor operational phase of the overall development will have a significant negative impact on the environment.

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