



**Manorhamilton Fire Station**  
**Cloneen, Manorhamilton, Co. Leitrim**  
**Planning Report**  
**May 2023**



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**REVISION CONTROL TABLE**

**DOCUMENT NO: 19077.PP.RHA.A.0001.PLANNING REPORT**

**User Is Responsible For Checking Revision Status Of This Document.**

<b>REV NO:</b>	<b>DESCRIPTION</b>	<b>PREPARED BY</b>	<b>CHECKED BY</b>	<b>APPROVED BY</b>	<b>DATE</b>
1	draft	IP			07/09/22
2	2 <sup>nd</sup> draft				02/12/22
3	CEMP findings added	IP	MD	IP	09/02/23
4	Leitrim CoCo Comments Incorporated	IOC	MD	IP	04/05/23

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# CONTENTS

1.0 INTRODUCTION.....	5
<b>1.1 PURPOSE OF REPORT</b> .....	5
<b>1.2 JUSTIFICATION FOR PROPOSED FIRE STATION</b> .....	5
2.0 SITE ANALYSIS .....	8
<b>2.1 OVERVIEW</b> .....	8
<b>2.2 HISTORICAL ANALYSIS</b> .....	10
<b>2.3 ARCHAEOLOGY</b> .....	11
<b>2.4 FLOOD MAP</b> .....	11
<b>2.5 SITE SURVEYS</b> .....	12
3.0 PROPOSED DEVELOPMENT.....	13
<b>3.1 Summary of Contents</b> .....	13
4.0 LEGISLATION AND GUIDELINES .....	14
<b>4.1 The EU Habitats Directive (92/43/EEC)</b> .....	14
<b>4.2 European Communities (Birds and Natural Habitats) Regulations 2011</b> .....	14
<b>4.3 National Nature Conservation Designations</b> .....	14
<b>4.4 Planning and Development Acts 2000 (as amended)</b> .....	14
5.0 LEITRIM DEVELOPMENT PLAN POLICY CONTEXT .....	15
6.0 ASSESSMENT.....	22
<b>6.1 Proposed Development’s Likely Impact on the Environment</b> .....	22
<b>6.2 Proposed Development’s Likely Consequences for the Proper Planning and Sustainable Development of the Area</b> .....	22
<b>6.3 Proposed Development’s Likely Impact on any European Sites</b> .....	23
<b>6.4 Extract from NIS</b> .....	25
<b>6.5 Cumulative Impact Assessment:</b> .....	25
<b>6.6 Construction Environmental Management Plan (CEMP):</b> .....	26
7.0 DESIGN STATEMENT .....	27
<b>7.1 DESIGN DEVELOPMENT</b> .....	27
<b>7.2 MATERIALS</b> .....	31
<b>7.3 PRECEDENT IMAGES</b> .....	32
8.0 Outline Specification.....	33
9.0 CONCLUSION .....	34



**Appendix A – Road Safety Audit .....35**  
**Appendix B - Archaeological Impact Assessment .....**  
**Appendix C – AA & Natura Impact Statement .....**  
**Appendix D – E.I.A Screening report .....**  
**Appendix E – Site Surveys .....**  
**Appendix F - Outline Construction & Demolition Waste Management Plan.....**  
**Appendix G - Construction & Environmental Management Plan (CEMP) .....**  
**Appendix H - Flood Risk Assessment.....**  
**Appendix I - Preliminary Health and Safety Plan .....**  
**Appendix J - Drainage Report.....**



## 1.0 INTRODUCTION

### 1.1 PURPOSE OF REPORT

The purpose of this report is to Support a Section 177 (AE) application to An Bord Pleanála, for a new Fire Station in Manorhamilton, Co Leitrim. The site is Located on the edge of the Town on the N16 Sligo Road on lands owned by Leitrim County Council, who are the applicant.

Site surveys have been instigated and undertaken and this report captures any existing site issues that may require resolution in future stages.

The site sits within Lough Gill Special Area of Conservation and both a Natura Impact Statement (NIS) and Environmental Impact Assessment (EIA) Screening Report have been prepared and accompany this application.

### 1.2 JUSTIFICATION FOR PROPOSED FIRE STATION

The Design Team note that the *Guidelines for Local Authorities on Applications for approval for Local Authority Developments made to An Bord Pleanála under 177AE of the Planning and Development Act, 2000, as amended (Appropriate Assessment)* indicate that a justification for the project forms part of the consideration of the likely consequences for proper and sustainable development in the area in which it is proposed to situate the development.

To assist in this regard, Leitrim County Council have prepared the following narrative:

#### Background

Leitrim County Council adopted a Section 26 Plan in December 2003 which outlined the priorities to be pursued in terms of Fire Station development for the future. The principal conclusion for the county was that the existing fire station in Manorhamilton was totally inadequate in terms of complying with the 'Design Standards for fire stations' outlined in the Department of Environment, Heritage and Local Government guidelines published in 2000.

In late 2005, the Health and Safety Authority carried out a separate independent inspection of the condition of Manorhamilton Fire Station. A number of health and safety deficiencies were highlighted in their report. A subsequent application for funding was made to the Department to address these short term deficiencies. Capital funding was received in October 2006 to remedy the immediate health and safety issues. There were many other areas where the existing station was deficient, no suitable training facility (drill yard), accommodation not suitable to house all our appliances and equipment, no suitable muster area for the firefighters, no suitable welfare facilities, etc.

Leitrim County Council then received approval in principle in 2007 from the Department to construct a new Fire Station in Manorhamilton. The Council set about trying to procure a suitable site locally. The Council were close to achieving this objective in 2010 when the downturn in the economy occurred and the opportunity to do so was delayed for some years. The Council submitted the site suitability report to the Department in December 2013. The new station was included in the Capital Programme announced by Minister Alan Kelly for 2016 – 2020. The Council eventually succeeded in procuring the existing site in Clooneen in May 2018. Approval was then secured from the Department in June 2019 for the appointment



of Design Consultants to design the new fire station and drill yard. The project has progressed to the stage of now submitting the project for approval to An Bord Pleanála.

The original capital funding approved for the project back in 2007 was €1 million. The Council received approval from the Department in June 2021 for project funding of €1.6 million but construction costs have increased even further since then. By March 31<sup>st</sup> 2022, the cost estimate had reached €2.367 million and it is expected to rise further.

### Existing Fire Station

Manorhamilton Fire Station was built in 1970 and comprises a single appliance bay with ancillary accommodation attached to and shared with the main County Council North Leitrim District Area Office. The Fire Station accommodation is 82 m<sup>2</sup> in area and provides very basic facilities for 9 no. retained firefighters. The Fire Station is located in an edge of town location on the main Sligo-Enniskillen Road (N16).

Manorhamilton Fire Station provides emergency cover to an area of 220 sq. miles in north county Leitrim and parts of Sligo and West Cavan. It is the largest fireground area in county Leitrim.

Manorhamilton currently has two fire appliances, a 2023 class B and a 2015 4x4 vehicle. The 4x4 vehicle was bought to deal specifically with the increasing number of road traffic collisions and to gain access to remote rural areas in the fireground during the bog fire season. Only the Class B appliance is capable of being housed at present in the current fire station. The 4x4 vehicle must be parked outside the station in the open air all year round. Unfortunately, this vehicle has been vandalised on a number of occasions. It is imperative that a new station is provided to house this vehicle.

### Deficiencies of existing Fire Station

The deficiencies with the existing Fire Station in Manorhamilton are as follows: -

1. There are no proper training facilities or drill tower for training of retained personnel. There is no secure drill yard provided adjacent to the station. There is no prospect of developing these training facilities at the current site.
2. There is insufficient access and egress for fire appliances into and out of the Fire Station along the N16 national primary road.
3. The door from the appliance bay leads straight onto a car park and footpath used by motorists and pedestrians using the Area Office and is a hazard for all in the event of an emergency.
4. The storage area for fire brigade equipment is totally inadequate. It is not possible to house the second fire appliance inside the station.
5. There is very little or no dedicated parking for retained firefighters on site. Parking outside the Fire Station gets very congested on occasions due to its proximity to the nearby local R.C. church.
6. There is no BA maintenance room in the station.
7. Inadequately sized watchroom.
8. There is no lecture room in the station.
9. There is only one shower provided for up to 9 no. male firefighters.
10. From a Health and Safety viewpoint, there is no non-slip surface or in the appliance bay area.
11. The roof is leaking over the appliance bay area.
12. The appliance bay door needs to be automated.
13. There are no canteen or welfare facilities for the firefighters at the station.



## Conclusion

It is the expressed view of the Emergency Services Department that a new purpose built two-bay fire station is required to satisfy the operational and training needs of the fire service in Manorhamilton for the foreseeable future. It is not feasible to consider any further upgrading of the existing Fire Station. The provision of a new station is the only way in which the outstanding serious deficiencies outlined above can be satisfactorily addressed. It is also necessary to ensure compliance with the '*Design Standards for fire stations*' outlined in the Department of Environment, Heritage and Local Government guidelines published in 2000.



## 2.0 SITE ANALYSIS

### 2.1 OVERVIEW

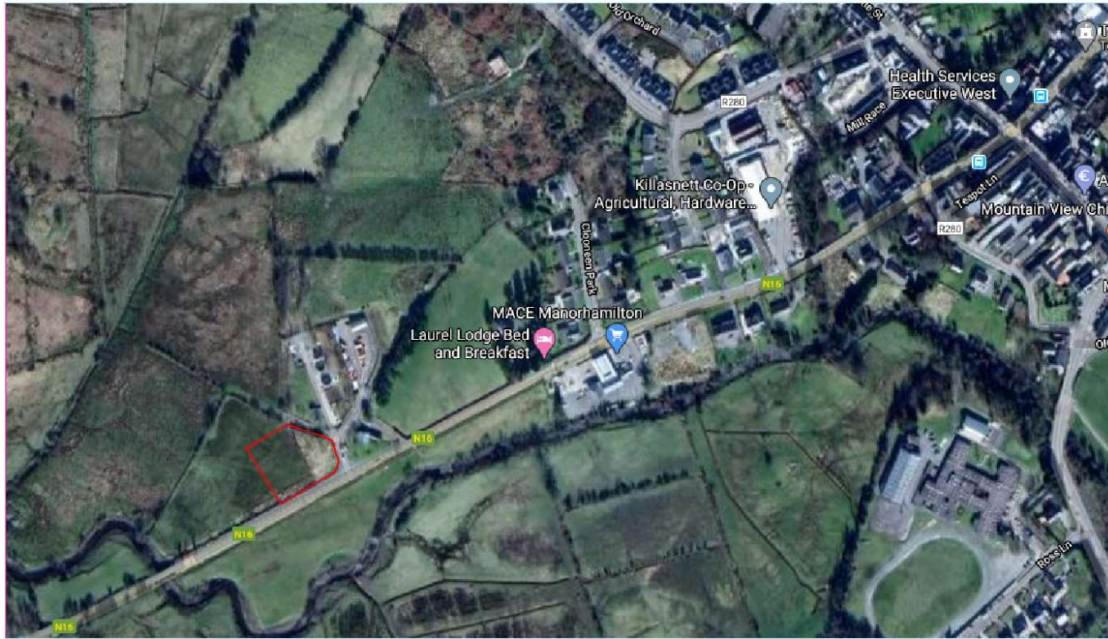
The Site is located at Cloneen, Manorhamilton, adjacent to the Manorhamilton sewage treatment works. The proposed development is situated to the west of Manorhamilton off the N16 National Primary Road. The site lies within 116 metres of nearby Bonet River and is almost entirely situated within Lough Gill SAC (Site Code 001976). The site slopes gently towards the north west of the site. The site area extends to 0.367 hectares in extent. The site was acquired by Leitrim County Council a number of years ago for the intended purpose of providing a new Fire Station and the western portion of the site is fenced off from the remainder of the original field with a timber post and rail fence. The portion of the site adjoining the access road is similarly fenced off. The site is bound to the west and north by lands in agricultural use. The lands to the north east are in use by Irish Water as the Manorhamilton Waste Water Treatment Plant and by Leitrim County Council as Manorhamilton Civic Amenity Centre. Both of these are accessed from an access road off the N16 National Primary Road

The site is a greenfield site and there are no apparent previous structures evident. Approximately half of the site is currently fenced with timber fencing, however much of the site perimeter is required to be fenced with secure metal fencing for security of the drill yard (refer to proposed site plan).

We note that the site slopes towards the north and west with a gradient of approximately 1:26: the site layout and drainage strategy has been developed to take account of this.

The proposed Fire Station is to house 2 no. fire appliances and approximately 11-13 staff members. The proposed building is a two storey structure with a butterfly roof. The accommodation sits to both sides of a double height garage space. The height of the proposed building is c.8.0m tall at its tallest point. An asphalt surface is to be provided to the car park and drill yard with a metal security fence bounding the drill yard. A drill tower is also proposed within the drill yard. The site will contain an attenuation lagoon to collect surface water runoff from the site. The green areas are proposed to be sown with tall wild grasses for screening and environmental purposes.





Existing Site Aerial Photo



Streetview Images





## 2.3 ARCHAEOLOGY

An Archaeological Impact Assessment report has been undertaken by Fado Archaeology, Refer to **Appendix B**

Refer to extracts below noting no archaeological impact of project.

*There were no features within the Proposed development area that can be considered archaeological or historical, the site is devoid of any upstanding features. Nothing of an archaeological nature was noted although given the slightly wet nature of the site, it is possible that the area may contain archaeological material of a wetland nature including fulacht fiadh or burnt spreads. Spoil around the engineering cores suggested a blackened peaty nature to the substrate and the occurrence of burnt spreads in this context cannot be ruled out.*

**No material/features of an archaeological nature were noted during the site inspection of the development site. The proposed development will have no temporary/permanent/residual negative impact either physical or visual on any known archaeological sites or monuments**

## 2.4 FLOOD MAP

As indicated below the site has not been included in the current CFRAM Flood Map.



Extract from Dept. of Housing, Local Government & Heritage – CFRAM Flood Map Mapviewer

The site sits on an elevated plateau and as such is raised substantially above the flood plain.



## 2.5 SITE SURVEYS

The following Site Surveys have been undertaken –

Topographical Survey	Completed by MPG Surveys	Appendix E
Underground Utilities Survey	Completed by MPG Surveys	Appendix E
Ground Investigation Survey/Trial Pits	CST Group	

These surveys have been reviewed by the Design team and the findings have been incorporated into the Design of the project.

These surveys are available for review at Appendix E of this report.



### 3.0 PROPOSED DEVELOPMENT

The proposed development comprises the following:

- A. Construction of a 2-bay Fire Station with ancillary accommodation.
- B. Formation of a Drill Yard & Drill Tower
- C. All ancillary Works associated with the above
  - i. Fencing
  - ii. Landscaping
  - iii. Car parking & aprons
  - iv. Attenuation lagoon
  - v. Storm outfalls
  - vi. Service connections
  - vii. Street Lighting
  - viii. Road markings and signage.

The proposed works are outlined in a series of Drawings prepared by Rhatigan Architects and CST Group consulting engineers.

#### 3.1 Summary of Contents

This Section 177 (AE) application is accompanied by the following documentation:

- A. Rhatigan Architects
  - i. Architects' drawings & details
  - ii. Outline Specification
  - iii. Outline Construction & Demolition Waste Management Plan
  - iv. Preliminary Health & Safety Plan
  - v. Construction & Environmental Management Plan (CEMP)
- B. CST Group Consulting engineers
  - i. Engineers' drawings and details
  - ii. Stage 1 RSA (119247)
  - iii. Flood Risk Assessment
- C. Patrick McCaul – Building Services engineers
  - i. – Street lighting design
- D. 3<sup>rd</sup> party Surveys & reports
  - i. Topographical survey-
  - ii. Archaeological Impact Assessment (Fado Jan 22)
  - iii. Natura Impact Statement (WSS ltd)
  - iv. EIA Screening report (LCC)



## 4.0 LEGISLATION AND GUIDELINES

### 4.1 The EU Habitats Directive (92/43/EEC)

This directive deals with the conservation of natural habitats and of wild fauna and flora throughout the European Union. Article 6(3) and 6(4) require an appropriate assessment of the likely significant effects of a proposed development on its own and in combination with other plans and projects which may have an effect on a European site (SAC or SPA).

### 4.2 European Communities (Birds and Natural Habitats) Regulations 2011

These regulations consolidate the European Communities (Natural Habitats) Regulations 1997 to 2005 and the European Communities (Birds and Natural Habitats) (Control of Recreational Activities) Regulations 2010, as well as addressing transposition failures identified in CJEU judgements. The Regulations in particular require in Reg 42(21) that where an appropriate assessment has already been carried out by a 'first' public authority for the same project (under a separate code of legislation) then a 'second' public authority considering that project for appropriate assessment under its own code of legislation is required to take account of the appropriate assessment of the first authority.

### 4.3 National Nature Conservation Designations

The Department of Culture, Heritage and the Gaeltacht and the National Parks and Wildlife Service are responsible for the designation of conservation sites throughout the country. The three main types of designation are Natural Heritage Areas (NHA), Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) and the latter two form part of the European Natura 2000 Network.

### 4.4 Planning and Development Acts 2000 (as amended)

Part XAB of the Planning and Development Act 2000 (as amended) sets out the requirements for the appropriate assessment of developments which could have an effect on a European site or its conservation objectives.

1. 177(AE) sets out the requirements for the appropriate assessment of developments carried out by or on behalf of local authorities.
2. Section 177(AE) (1) requires a local authority to prepare, or cause to be prepared, a Natura impact statement in respect of the proposed development.
3. Section 177(AE) (2) states that a proposed development in respect of which an appropriate assessment is required shall not be carried out unless the Board has approved it with or without modifications.
4. Section 177(AE) (3) states that where a Natura Impact Assessment has been prepared pursuant to subsection (1), the local authority shall apply to the Board for approval and the provisions of Part XAB shall apply to the carrying out of the appropriate assessment.
5. Section 177(V) (3) states that a competent authority shall give consent for a proposed development only after having determined that the proposed development shall not adversely affect the integrity of a European site.
6. Section 177AE (6) (a) states that before making a decision in respect of a proposed development the Board shall consider the NIS, any submissions or observations received and any other information relating to:
  - a) The likely effects on the environment.
  - b) The likely consequences for the proper planning and sustainable development of the area
  - c) The likely significant effects on a European site.



## 5.0 LEITRIM DEVELOPMENT PLAN POLICY CONTEXT

### Leitrim County Development Plan 2023-2029 Manorhamilton Settlement Plan

The Leitrim County Development Plan 2023-2029 (hereafter referred to as 'The Plan') was adopted on 7<sup>th</sup> February 2023 and took effect from 21<sup>st</sup> March 2023. The Plan contains a Settlement Plan for Manorhamilton in Volume II. This extends to a Written Statement for the town and is accompanied by a land use zoning objectives map and separate objectives map (Volume III).

The subject site which has been in the ownership and control of Leitrim County Council for a number of years is identified with a 'Utilities' land use zoning objective. This objective seeks "To provide land for public infrastructure and public utilities." The use of the adjoining Manorhamilton Wastewater Treatment Plan and Civic Amenity site are similarly provided with the same 'Utilities' land use zoning objective. An extract from the land use zoning objectives map from the Plan for Manorhamilton is provided in Figure 1 below with the site outlined in red.

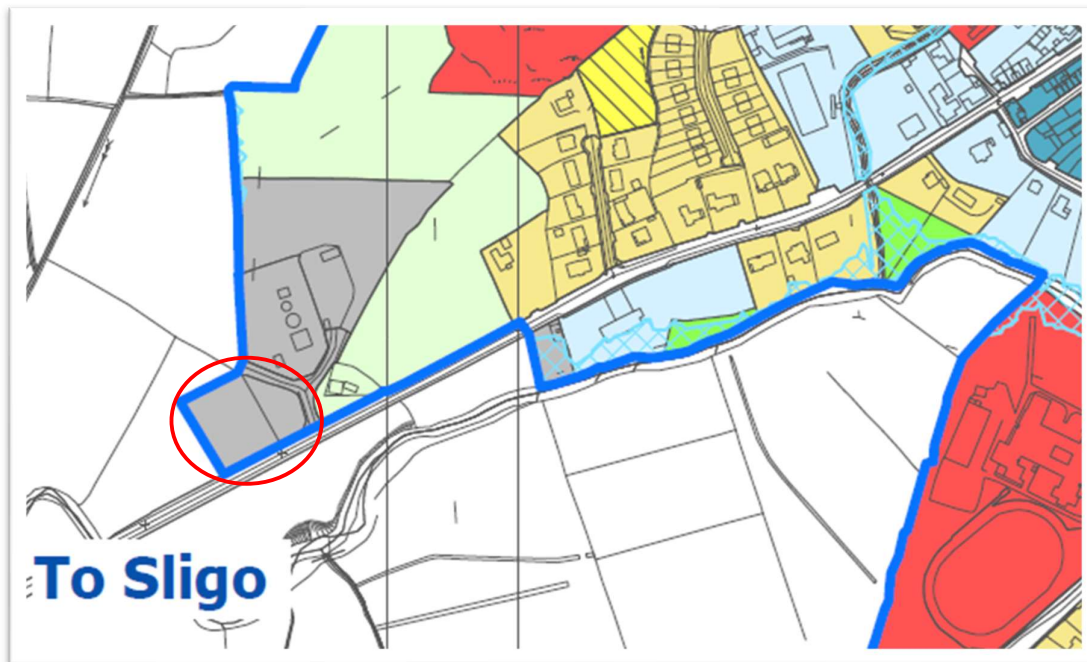


Figure 1: Extract from Manorhamilton Objectives Map (Map No. 14 Leitrim County Development Plan 2023-2029, Volume III).

Table 6.2 of Volume I of the Plan provides guidance on the individual land use zoning objectives. With regard to 'Utilities', it states:

*This zoning primarily provides for and preserves land in the ownership of the Council or other bodies charged with the provision of services such as electricity, telecommunications, water, wastewater etc. to individual towns and villages.*

It is considered that the proposed use is 'Public Utility / Infrastructure' which will normally be acceptable in principle within this land use zoning classification, with reference to the Land Use Zoning Matrix contained in Table 5.6 of Volume I of the Plan. Not all individual uses such as 'Fire Station' would be expected to be



contained in a Zoning Matrix. The acceptability of the principle of the proposed use is reinforced by reference to a specific objective contained in the Manorhamilton Settlement Plan. An extract from the objectives map is contained in Figure 2 overleaf with the site outlined in red.



**Figure 2:** Extract from Manorhamilton Objectives Map (Map No. 15 Leitrim County Development Plan 2023-2029, Volume III).

The specific objective MHN 24 seeks to:

*Relocate the Fire Station to the site identified with a 'Utility' land use zoning objective on the Sligo Road.*

There is also a specific objective (**FS OBJ 2**) supporting the development of the subject site within Volume I of the County Development Plan. This objective seeks:

*"To facilitate the development of a new fire station on a site identified in the Manorhamilton land use zoning objectives map subject to the undertaking of the necessary environmental assessments as part of the planning consent process".*

It is therefore concluded that the principle of the proposed use of a Fire Station at this location is clearly provided for in the statutory land use plan for Manorhamilton.

#### **Leitrim County Development Plan 2023-2029 Wider Considerations**

##### **Flood Risk**

The relevant section of the Plan is **Section 9.8 Flood Risk Management**. The relevant policies are considered to be:





### **FRM POL 2**

To ensure that a flood risk assessment is carried out for any development proposal, in accordance with the Planning System and Flood Risk Management (DoEHLG/OPW 2009) and Circular PL2/2014. This assessment shall be appropriate to the scale and nature of risk to the potential development.

### **FRM POL 11**

To require proposals for development to comply with requirements of the Planning System and Flood Risk Assessment Guidelines including providing detailed design specifications as may be required to assess the impact of development.

- c) In Flood Zone C, where the probability of flooding is low (less than 0.1%), site specific Flood Risk Assessment may be required and the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed. The County Development Plan SFRA datasets and the most up to date information on flood risk, including that relating to climate scenarios, should be consulted by prospective applicants for developments in this regard and will be made available to lower-tier Development Management processes in the Council.

### **FRM POL 12**

To require that Strategic Flood Risk Assessments and site-specific Flood Risk Assessments shall provide information on the implications of climate change with regard to flood risk in relevant locations. The Flood Risk Management – Climate Change Sectoral Adaptation Plan (2019) shall be consulted with to this effect.

A Fire Station is classified as a highly vulnerable development to the effects of flooding in *'The Planning System and Flood Risk Assessment Guidelines'* (2009). The subject site was not identified as being at risk of flooding in the Strategic Flood Risk Assessment (SFRA) which was prepared to inform the County Development Plan 2023-2029. The Plan has relied on the first two principles of flood risk assessment (avoiding the risk, where possible and substituting less vulnerable uses, where avoidance is not possible) and has avoided the risk or substituted less vulnerable uses to the effects of flooding as areas at risk of flooding. The subject site is not therefore identified as a *'constrained land use'* on the land use zoning objective as presented in Figure 1.

A Flood Risk Assessment of the proposed development has been undertaken by Punch Consulting Engineers which satisfies the requirements of *The Planning System and Flood Risk Assessment Guidelines'* (2009) and that of the County Development Plan 2023-2029. As the proposed development is located on lands classified as Flood Zone C, no issues therefore arise with regard to the potential of flood risk to the subject site.

### **Access to the Site**

**Section 8.11.2.4** of the Plan deals with **Access to National Roads**.

The *Spatial Planning and National Road Guidelines* (2012) state (Section 2.5) that *"The policy of the Planning Authority will be to avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60kmh apply. This provision applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant"*.

**Section 8.11.2.5** of the Plan deals with **Exceptional Circumstances**. Section 2.6 of the guidelines provides for exceptional circumstances to the above general policy provision. Planning Authorities may identify stretches of national roads where a less restrictive approach may be applied as part of the Development Plan process. The guidelines provide that a less restrictive approach may be adopted in the case of developments of



national and regional strategic importance which by their nature are most appropriately located outside urban areas, and where the locations concerned have specific characteristics that make them particularly suitable for the developments proposed.

It was not the intention of the Planning Authority to identify any such location in the preparation of the Plan. As outlined above, as the subject site is presently partially within and partially outside of the transitional speed limit area, it was not considered necessary to include the site as an exceptional circumstance. This was not an oversight; it was simply not considered necessary as the primary access to the site is within the reduced speed limit area.

The relevant policies of the Plan are considered to be:

**TRAN POL 1**

To maintain and protect the safety, capacity and efficiency of national roads and associated junctions in accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities (DECLG, 2012).

**TRAN POL 2**

To protect the national road network from new access points and the intensification of existing accesses onto or adjacent to national roads in accordance with the requirements of Section 2.5 of Spatial Planning and National Roads Guidelines for Planning Authorities (DECLG,2012) to maintain traffic capacity, minimise traffic hazard and protect and maximise public investment in such roads.

**TRAN POL 3**

To require all applications for significant development proposals to be accompanied by a Traffic and Transport Assessment (TTA) and Road Safety Audit (RSA), carried out by suitably competent persons, in accordance with the TII's Traffic and Transport Assessment Guidelines.

**TRAN POL 5**

To avoid the creation of any additional access point from new development/intensification of traffic from existing entrance onto national roads outside the 60kph speed limit.

The subject site is partially located within the transitional speed limit. The proposed staff entrance is located within the 60km/hr speed limits whilst the proposed fire tender access / egress immediately adjoins same. The subject application will be referred to the TII for comment to the Board and it is proposed to extend slightly the speed limit so that the entire site is wholly contained within the transitional speed limit area. This will be subject to TII National Speed Limit Review. In any event, it is not considered likely that occasional use by emergency vehicles within the built-up area of the town of Manorhamilton would present an issue for the TII having regard to the low levels of projected traffic movements.



**Figure 3:** Existing restricted speed limit along roadside frontage of proposed Fire Station site  
(Source: Google Streetview, November 2022)

On the basis of the foregoing and the conclusions of the submitted Road Safety Audit (Stage 1) in accordance with the requirements of TRAN POL 3 by the CST Group, it is considered that the proposed development adheres to the stated policy framework as contained in the County Development Plan 2023-2029 with regard to the control of entrances onto the national primary road network.

#### **Natura 2000 Sites**

**Section 11.3.1** of the Plan deals with **European, National and Other Environmentally Sensitive Sites.**

The Plan states that it is considered that certain developments within areas adjoining and in the vicinity of environmentally sensitive areas may impact on the integrity of such sensitive areas. Accordingly, areas adjoining environmentally sensitive sites, including Natura 2000 sites, Natural Heritage Areas, proposed Natural Heritage Areas, Areas of Outstanding Natural Beauty, Areas of High Visual Amenity, and other features such as lakes, rivers, waterways, wetlands, peatlands and deciduous woodlands, shall be protected from inappropriate development through the Development Management process. A policy framework is then presented for Natura 2000 sites in Section 11.3.2 of the Plan.

The Council shall take appropriate steps to avoid, in these areas, the deterioration of natural habitats and the habitats of species, as well as disturbance of the species for which the areas have been designated, in so far as such disturbance could be significant in relation to the objectives of the *EU Habitats Directive* and *EU Birds Directive*.

Any plan or project not directly connected with or necessary to the management of the site, but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to an '*Appropriate Assessment*' (in this case by An Bord Pleanála) of its implications for the site in view of the site's conservation objectives. Considering the conclusions of the assessment of the implications for the site, and subject to the provisions of Article 6(4) of the Habitats Directive, the Council shall agree to the plan or project proceeding only after having ascertained that it will not adversely affect the qualifying interests and conservation objectives of the site concerned.



The relevant policies of the Plan are considered to be:

**NH POL 1**

To protect and conserve Special Areas of Conservation and Special Protection Areas.

**NH POL 2**

To implement Article 6(3) and where necessary Article 6(4) of the Habitats Directive, to ensure that Appropriate Assessment is carried out in relation to works, plans and projects with the potential to impact European sites (SACs and SPAs), whether directly or indirectly or in combination with any other plan(s) or project(s). All assessments must be in compliance with the European Communities (Birds and Natural Habitats) Regulations 2011, as amended, and the Planning & Development Act 2000, as amended as relevant.

The relevant objectives of the Plan are considered to be:

**NH OBJ 1**

To ensure that no project or programme giving rise to significant adverse, direct, indirect, secondary or cumulative impacts on the integrity of any Natura 2000 site(s), having regard to their qualifying interests and conservation objectives, arising from their size, scale, area or land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either alone or in combination with other plans or projects)

**NH OBJ 2**

To protect and conserve those sites designated as Special Areas of Conservation (SACs) during the lifetime of this Plan. The list of current SACs is contained in Table 11.1 of this Chapter. *(Please note that this list includes Lough Gill, Site Code 001976).*

On the basis of the Natura Impact Assessment prepared by Woodrow Sustainable Solutions Ltd., Leitrim County Council are satisfied that the requirements of the Plan and of the Habitats Directive have been adhered to.

**Built Heritage**

**Section 11.22** deals with **Archaeological Heritage**. The Plan acknowledges that the archaeological heritage of the county is not confined to the archaeological sites within the Record of Monuments and Places, but also includes any archaeological site that may not have been recorded yet, as well as archaeology beneath the ground surface, underwater archaeological heritage, as well as the context of any site.

The relevant policy of the Plan is considered to be:

**ARCH POL 1**

To secure the preservation (i.e. preservation in-situ or in particular circumstances where the Council is satisfied that this is not possible, preservation by record as a minimum) of all archaeological remains and sites of importance such as National Monuments, Recorded Monuments, protected wrecks and underwater archaeological heritage, to include their setting and context.



The relevant objective of the Plan is considered to be:

**ARCH OBJ 3**

To require, where appropriate, that an archaeological assessment or underwater archaeological impact assessment be carried out by a suitably qualified person prior to the commencement of any activity that may impact upon archaeological heritage, including underwater archaeological heritage.

It is concluded that the requirements of the policy framework contained in the County Development Plan 2023-2029 have been adhered to in the undertaking of the submitted Archaeological Impact Assessment by Fado Archaeology. It is considered that the conclusion of their desktop archaeological assessment was that there were no features within the proposed development area that can be considered archaeological or historical noting that the site is devoid of any upstanding features. Notwithstanding that nothing of an archaeological nature was noted, the occurrence of burnt spreads in this context cannot be ruled out thus requiring the inclusion of a condition by the Board that archaeological monitoring be undertaken at construction stage.



## 6.0 ASSESSMENT

Under the provisions of Section 177AE the Board is required to consider the following in respect of this type of application:

1. The proposed development's likely impact on the environment
2. The proposed development's likely consequences for the proper planning and sustainable development of the area
3. The proposed development's likely impact on any European sites (i.e. Appropriate Assessment)

### 6.1 Proposed Development's Likely Impact on the Environment

In determining the proposed development's likely impact on the environment, consideration should be given to the Environmental Impact Assessment Screening Report (Appendix D)

#### 6.1.1 Environmental Impact Assessment Screening Report

An EIA screening report has been prepared and is included at **Appendix D** and concludes the following:

*The proposed development could be considered to fall within the scope of the Infrastructure project type prescribed in the Directive or Regulations. However it is considered to be sub-threshold in nature.*

*Applying the precautionary principle and for the avoidance of doubt, the project has nonetheless been reviewed against prescribed criteria for determining whether or not a sub-threshold development is required to be subject to EIA. A global consideration of the criteria finds that the environmental effects of the project are not likely to be significant within the meaning of the Directive. It is therefore concluded that there is no real likelihood of significant effects on the environment arising from the development.*

***It is considered that the proposed Fire Station development does not need to be subject to Environmental Impact Assessment and no Environmental Impact Assessment Report is required for it.***

*This conclusion is based on an objective review of the proposed development, including its characteristics, location and the likelihood of it causing significant environmental impacts. The screening has followed the relevant legislation and has had regard to the relevant guidance.*

### 6.2 Proposed Development's Likely Consequences for the Proper Planning and Sustainable Development of the Area

The site is appropriately zoned for Utilities and consistent with the Local Authorities objectives for this site.

It will move the fire station away from its current location in the Church car park with inappropriate adjacencies to the Hospital and schools which is in a very busy public location. Furthermore, the proposed development has been designed in keeping with the policies and objectives of the Leitrim County Development Plan 2023-2029 and the National and EU legislation relating to the surrounding ecology and environment.



### 6.3 Proposed Development's Likely Impact on any European Sites

Woodrow Environmental Consultants have produced an Appropriate Assessment Screening Report and a Natura Impact Statement (**Appendix C**)

6.3.1 The Appropriate Assessment Screening Report concludes the following:

The proposed development is not connected with or necessary for the management of any Natura 2000 Site. The proposed area of works is situated within Lough Gill SAC. As a result of this, Lough Gill SAC is considered to be within the Zone of Influence which poses the risk of direct and indirect impacts and therefore the risk of significant effects, on this Natura 2000 Site and its QI's.

Below, Lough Gill SAC and its QI's which are considered to be within the Zone of Influence are listed. Due to the fact that these Natura 2000 Sites could be affected by the proposed development for the reasons outlined below, it is deemed necessary using the precautionary principle to 'screen in' these Natura 2000 Sites and to undertake an Appropriate Assessment in order to consider if the proposed development could affect the integrity of these Natura 2000 Sites.

The following QIs of the Lough Gill SAC could be affected by water quality impacts:

- *Austropotamobius pallipes* (White-clawed Crayfish) [1092]
- *Petromyzon marinus* (Sea Lamprey) [1095]
- *Lampetra planeri* (Brook Lamprey) [1096]
- *Lampetra fluviatilis* (River Lamprey) [1099]
- *Salmo salar* (Salmon) [1106]
- *Lutra lutra* (Otter) [1355]

The following QIs of the Lough Gill SAC could be affected by disturbance impacts:

- *Lutra lutra* (Otter) [1355]

Conservation Objectives for the Qualifying Interests within the Zone of Influence are:

To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected (NPWS, 2021a)

Following the screening process above, the screening matrix of all impacts ruled out Natura 2000 Sites for further assessment based on distance and the lack of a source-pathway-receptor linkage between the QIs and their specific sensitivities, and the proposed development. One Natura 2000 Site, Lough Gill SAC, has been identified as being in the Zone of Influence. The QIs within the Lough Gill SAC which are within the Zone of Influence were identified, these are: *Austropotamobius pallipes* (white-clawed Crayfish) [1092], *Petromyzon marinus* (sea lamprey) [1095], *Lampetra planeri* (brook lamprey) [1096], *Lampetra fluviatilis* (river lamprey) [1099], *Salmo salar* (Atlantic salmon) [1106] and *Lutra lutra* (otter) [1355]

**The Screening for Appropriate Assessment concluded that there is Potential Significant Effect on Lough Gill SAC and that a Natura Impact Statement was required. Natura 2000 Sites and the QIs within the Zone of Influence are assessed as part of the Natura Impact Assessment process.**

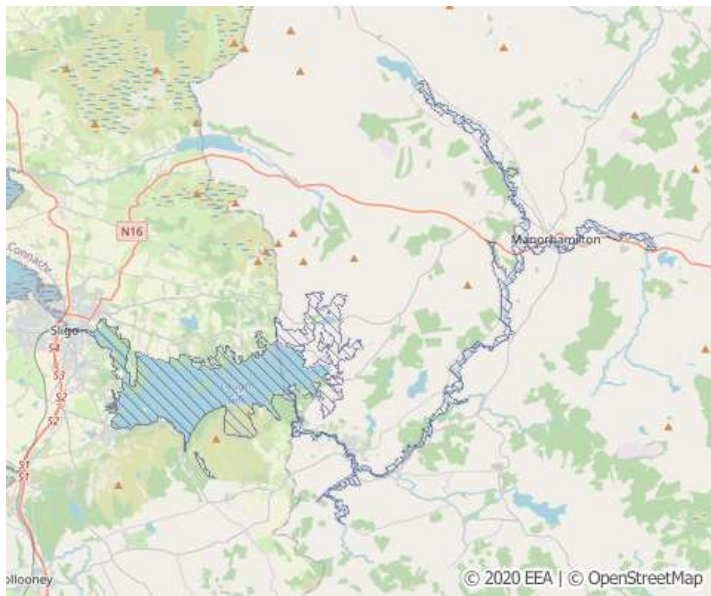


### 6.3.2 ENVIRONMENTAL

As identified above, the site sits within Lough Gill Special Area of Conservation.



Extract from OSI mapviewer with site overlaid in red



Extent of Lough Gill SAC





## 6.4 Extract from NIS

*This Natura Impact Statement has examined whether, in view of best scientific knowledge and applying the precautionary principle, the proposed project either individually, or in combination with other plans or projects, may have an adverse effect on the integrity of any Natura 2000 Site (also known as European sites).*

*The Screening for Appropriate Assessment concluded that there is Potential Significant Effect on Lough Gill SAC and the following QIs within the Zone of Influence: Austropotamobius pallipes (white-clawed crayfish) [1092], Petromyzon marinus (sea lamprey) [1095], Lampetra planeri (brook lamprey) [1096], Lampetra fluviatilis (river lamprey) [1099], Salmo salar (salmon) [1106], Lutra lutra (otter) [1355]*

*The Natura 2000 Site, Lough Gill SAC and its QIs within the Zone of Influence were assessed as part of the Natura Impact Assessment process. This process found that whilst a number of potential impacts, namely water quality (construction and operational) and inappropriate dumping and otter disturbance were identified, that the mitigation measures presented in Section 7 eliminate the Potential for Adverse Effect on the Natura 2000 Sites, and their Qis within the Zone of Influence. **Therefore, it is considered that the proposed development will not have an adverse effect on the integrity of any Natura 2000 Site.***

## 6.5 Cumulative Impact Assessment

The majority of potential for in combination impacts will occur during the construction phase of the proposed development. This will primarily manifest in the form of potential surface water contamination. As such, the search for other developments was limited to areas in proximity to the Bonet River and in the locality of the proposed development. The search was limited to developments which have been granted permission since 2019, which thus may be in their construction phase. Additionally, developments in proximity to nearby waterbodies, whose operations were deemed to represent potential in combination effects were also considered.

Given the low level of staffing and limited nature OF activities on site during the operational phase, the proposed development is expected to contribute a maximum of 15 population equivalent (PE) (Personal communication, CST Group 10/11/21). The proposed development will not significantly impact upon the capacity or efficiency of the nearby Manorhamilton WWTP, which has a PE of 3,000 after recent upgrades.

Given the limited number of other applications (2 no.) with potential for in combination impacts, coupled with the limited nature of site activities, there is considered unlikely to be significant effects on designated sites as a result of in combination impacts. Thus, whilst there is potential for the proposed development to act additively / incrementally with the consented planning applications, the impact will be so limited it will not cause significant effects on the QIs of the Lough Gill SAC.

Mitigation measures that support this are presented in Section 7.2. of the NIS.



## 6.6 Construction Environmental Management Plan (CEMP)

The attached Construction Environmental Management Plan (CEMP) has been developed in accordance with the:

- Institute of Environmental Management and Assessment (IEMA) Practitioner “Environmental Management Plans”, Best Practice Series, Volume 12, December 2008 and;
- follows the general guidance as set out in Biodiversity — Code of practice for planning and development BS42020 clause 10.2 as stated with the Chartered Institute of Environmental and Ecological Management (CIEEM) guidelines for ecological report writing Second Edition December 2017

The CEMP takes into account requirements of the Natura Impact Statement prepared by Woodrow (2022).

Prior to commencement of works, the Contractors will appoint an **Environmental Manager (EM)** for the project, who shall be responsible for the development of the CEMP, and arising procedures and documents. The EM shall be responsible for ensuring that site procedures are implemented, that records are maintained as required and that construction staff have appropriate training and competence for implementing their CEMP functions. The Contractor will also nominate a **Site Environmental Supervisor** who will be responsible for the implementation of the plan, record keeping, and maintenance of mitigation measures, Contractor’s site environmental auditing and Contractor’s site environmental work permits. The EM shall have the necessary authority to propose alternative or additional work methods necessary to satisfy any environmental aspect of the Works (to be agreed with the Developer in advance any changes). The Environmental Manager will also review the Contractor’s method statements and environmental plans as required by the CEMP, carry out compliance auditing during the construction phase and coordinate the site meetings with the Developer as required. The Contractors will accommodate any third-party environmental auditing, as appropriate.

The CEMP is divided into discreet sections which are designed to be filed as separate documents / folders if required.

A copy of the CEMP documents / folder(s) will be kept in the site offices for the duration of the site works and will be made available for review at any time.

Upon completion of the construction works, the Contractors will submit a complete soft copy of the most current CEMP to the Developer for their records. This final CEMP will include electronic scans of all hard copy reports, data, field records and correspondence which are gathered over the course of the construction works.

Notwithstanding the above, the initial draft of the CEMP is intended to cover all environmental requirements and is considered to cover the minimum environmental standards and considerations required.

A key part of this CEMP is Section 5 ‘Technical Schedules’. This section provides details on specific environmental requirements arising from compliance documents such as the Natura Impact Statement in differing work areas. It is imperative that these requirements are complied with, and appropriately captured in all working practices and any future amendments to method statements.



## 7.0 DESIGN STATEMENT

### 7.1 DESIGN DEVELOPMENT

The overall form & materiality of the building is vernacular in approach with use of rendered concrete and corrugated finishes. The Butterfly roof seeks to reduce the mass and impact of the volume whilst invoking the valleys and peaks of the surrounding landscape.

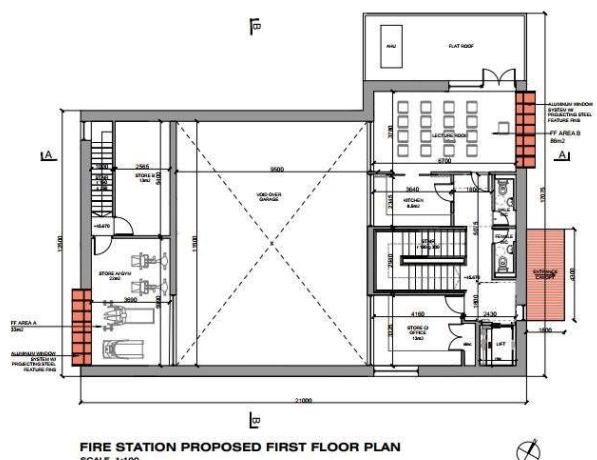
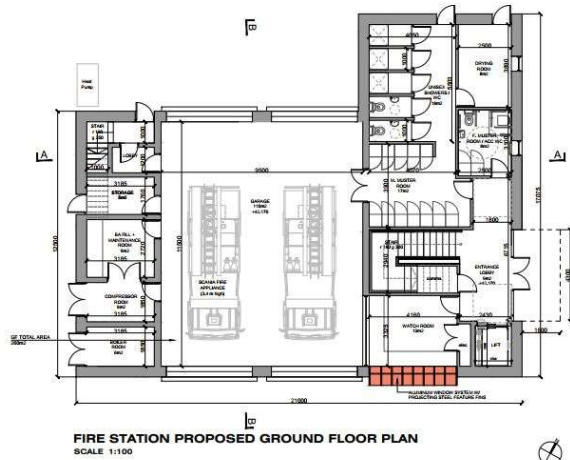


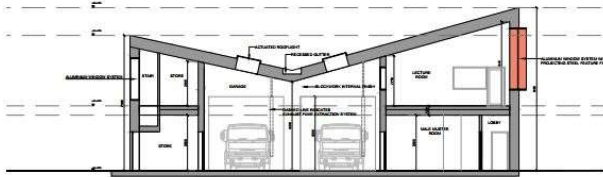
The building is on a prominent site on the approach to Manorhamilton, and whilst the functionality of an efficient Fire Service deployment is critical, care has been taken to ensure the site is well integrated into this sensitive landscape adjacent to the River Bonet. The boundaries will be augmented with well considered native planting which will provide habitat whilst screening & softening the development.

The functional components of the development including the drill yard and parking areas are located to the rear of the site and suitably screened, whilst the apron to the front of the building has been kept to a minimum. An attenuation lagoon is located in the south west corner of the site to control the runoff of surface water from the site, however this too will contribute to the habitat and bio-diversity of the site.

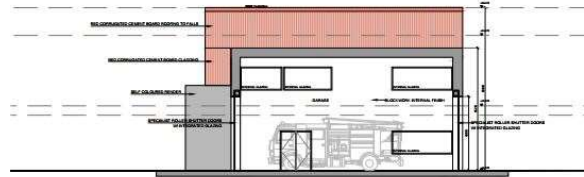


Proposed Site Plan

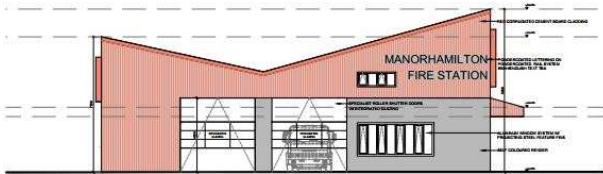




**PROPOSED SECTION A-A**  
SCALE 1:100



**PROPOSED SECTION B-B**  
SCALE 1:100



**SOUTH ELEVATION**  
SCALE 1:100



**NORTH ELEVATION**  
SCALE 1:100



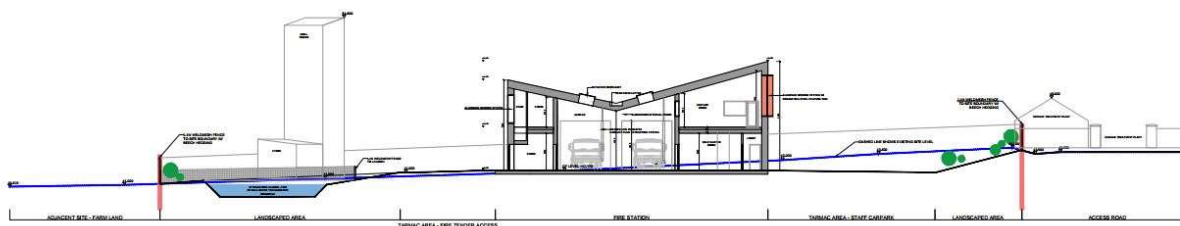
**EAST ELEVATION**  
SCALE 1:100



**WEST ELEVATION**  
SCALE 1:100



**PROPOSED SITE SECTION B-B**  
SCALE 1:100



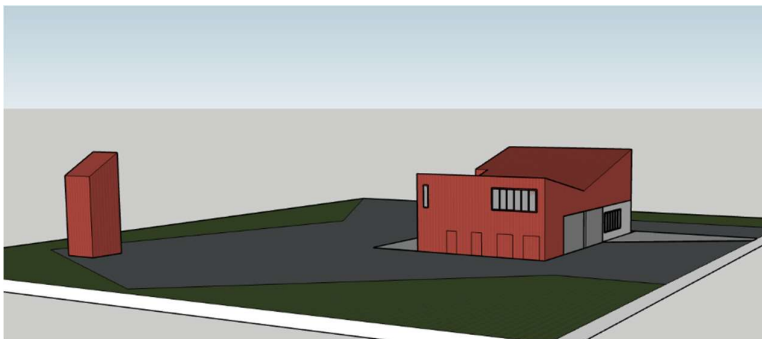
**PROPOSED SITE SECTION A-A**  
SCALE 1:100



View of South Elevation / Entrance



View of East Elevation / Entrance



View of West Elevation



## 7.2 MATERIALS

It is proposed that the external elevations are comprised of self-coloured render with a cladding of cement board to the First floor and workshop areas. This is to reference agricultural architecture in the area.

### MATERIAL REFERENCE IMAGES



Shed Adjacent to Site



Local Reference



Reference Image



Reference Image



Reference Image



Reference Image



Local Signage Reference



### 7.3 PRECEDENT IMAGES



Waterford Fire Station - McCullough Mulvin Architects



Monaghan Fire Station - van Dijk Architects



Oregon Fire Station - Hennebery Eddy Architects

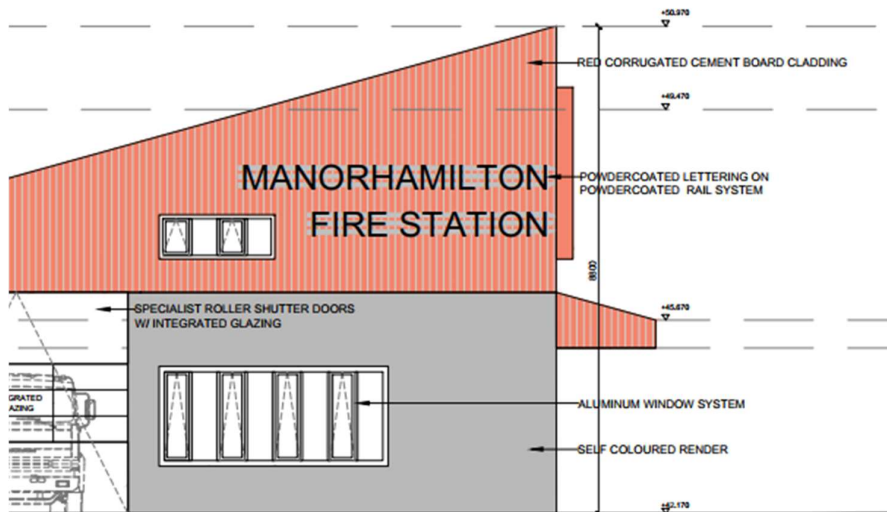
Antwerp Fire Station - Happel Cornelisse Verhoeven





## 8.0 Outline Specification

- Substructure – Concrete Raft Foundations - tba by Engineer
- Superstructure - Concrete Beams w/Concrete Cavity Walls + Steel to Roof - tba by Engineer
- Cladding (including external windows and doors)



FF + GF Workshop – Corrugated Cement Board – range tba

GF – ‘Public Zone’ – Self Coloured Render

- Roofing - Kingspan Insulated Roof Panels/ Insulated Roof w/ Corrugated Cement Board Cladding
- Internal walls and partitions – Gyprock Extreme System – Fire Rating + Insulation as required/ painted blockwork walls.
- Internal doors – Formica/HPL faced solid doors – fire ratings as required
- Ceilings – General Rooms – Armstrong Ceiling Tile in Frame Systems  
– Garage + Maintenance Rooms – Skimmed Cement Board
- Flooring – General Rooms – Marmolem Solid/Surestep Vinyl in wet areas  
– Garage + Maintenance Rooms – Floortech Trazcon Decor Resin System 3
- Finishes – Dulux Diamond High Performance Eggshell
- Building services (including lighting, heating, ventilation and air conditioning, water supply and drainage and other special installations). - tba by M+E Engineer
- Fixtures and fittings (such as sanitary fittings) – Sanitary Ware - Armitage Shanks Range / Ironmongery – KCC Range / Drying Racks – tba / Lockers – tba / Fitted Furniture – HPL on Plywood
- Landscape – Refer to Site Plan – Tarmac to Drill Yard + Car park w/ Markings / Wild Grasses to Site Perimeter / Minor Landscaping + Paved area outside Main Entrance / New Perimeter Fencing to Entire Site + Gates



## 9.0 CONCLUSION

This summary report has identified and outlined the requirements and standards, which are anticipated to be of relevance to the proposed Manorhamilton Fire Station development. The identified requirements & standards include domestic and European legislation and guidelines in addition to Leitrim County Development Plan standards, objectives and policies.

Following a review of the requirements and guidelines described in the paragraph above, project specific investigations were undertaken to determine the likely impacts, with respect to the aforementioned requirements, that would arise as a result of the proposed development. These investigations were carried out by third parties and the methodologies, results and conclusions of each investigation was captured in the form of an individual report.

An “Appropriate Assessment Screening Report” was produced by Woodrow Environmental with the aim of determining the requirement for a comprehensive Appropriate Assessment. In the concluding remarks, it was noted that an Appropriate Assessment would indeed be required.

As a result of the findings of the Appropriate Assessment Screening Report and Natura Impact Statement were undertaken by Woodrow Environmental and found that the proposed construction of a Fire Station at the site in Cloneen, Manorhamilton individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site.

The Environmental Impact Assessment Screening Report produced by Leitrim County Council concluded that the proposed development is not a project for which an EIA is mandatory under either European Union or Irish law. It was also noted that the proposed development is not a sub-threshold development that requires an EIA. In this regard, the proposed development was assessed against the relevant criteria and is considered unlikely to have significant effects on the environment.

A Construction and Environmental Management Plan was created in order to assist the Natura Impact Statement, the Ecological Impact Assessment and the Environmental Impact Assessment Screening Report, through the provision of appropriate mitigation measures. The measures and best practice guidelines outlined in the CEMP were taken into consideration in the findings of the third-party reports.

Giving consideration to the proposed project’s compliance with Irish and EU legislation, the Leitrim County Development Plan 2023-2029 and the findings of the conducted Appropriate Assessment and auxiliary reports, it is our opinion that the project is feasible, and adheres to the principles of the proper planning and sustainable development of the area.



## Appendix A – Road Safety Audit



## Appendix B - Archaeological Impact Assessment



## Appendix C – AA & Natura Impact Statement



Appendix D – E.I.A Screening report



## Appendix E – Site Surveys

Topographical Survey

Completed by MPG Surveys

Underground Utilities Survey

Completed by MPG Surveys



## Appendix F - Outline Construction & Demolition Waste Management Plan





**Appendix G - Construction & Environmental Management Plan (CEMP)**



## Appendix H - Flood Risk Assessment



**Appendix I - Preliminary Health and Safety Plan**



## Appendix J - Drainage Report