

Leitrim County Council

Environmental Impact AssessmentScreening Report

Proposed Fire Station, Cloneen, Manorhamilton, Co. Leitrim

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Report Prepared by Bernard Greene, Senior Planner, M.A., M.R.U.P., M.I.P.I.

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1. Introduction

This is an EIA screening report with respect to the development of a proposed new Fire Station off the N16 National Primary Road by Leitrim County Council at Cloneen, Manorhamilton, Co. Leitrim. The purpose of the report is to form an opinion as to whether or not the proposed development should be subject to Environmental Impact Assessment (EIA) and if so, whether an Environmental Impact Assessment Report (EIAR) should be prepared in respect of it. An Appropriate Assessment Screening Statement and Natura Impact Statement have also prepared as separate documents.

The screening assesses the proposed development with reference to the EIA legislation including the EIA Directive, and Planning and Development legislation. It also has regard to relevant parts of *EIA Guidance* for Consent Authorities regarding sub-threshold development, 2003, Department of the Environment, Heritage and Local Government and Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, 2018, Department of Housing, Planning and Local Government and relevant EU Guidance including Interpretation of definitions of project categories of annex I and II of the EIA Directive, 2015, EU and Environmental Impact Assessment of Projects - Guidance on Screening, 2017, EU.

The consideration of potential impacts covers all significant direct, indirect and secondary impacts as relevant, with reference to the guidance and in compliance with the legislation, including the criteria for determining whether certain development types should be subject to EIA, and which are grouped into these categories in the Directive:

- i) Characteristics of the proposal
- ii) Location of the proposal
- iii) Characteristics of potential impacts

Where used, descriptions of impacts follow the statutory EPA Guidelines on the information to be contained in Environmental Impact Assessment Reports (2017 (draft)).

The following sections of this report cover:

- The proposed development (Section 2)
- The legislative basis for EIA (Section 3)
- Screening considerations (Section 4)
- Conclusion (Section 5)

2. The Proposed Development

2.1 Location

The proposed development is situated to the west of Manorhamilton off the N16 National Primary Road at a point where the transitional speed limit of 60 km/hr applies. Figure 1 overleaf shows the location of the proposed development whilst Figure 2 outlines the site in the context of the Lough Gill Special Area of Conservation. 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.



Figure 1: Location of proposed site of new Fire Station

Figure 2: Location of proposed site in the context of the Local Gill Special Area of Conservation



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.

2.2 Project Details

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.

The proposed development is displayed in Figure 3 below (and Appendix A). The scaled drawing of the Site Layout Plan should be referred to for greater detail. 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.



Figure 3: Proposed Site Layout

Storm drainage from the site will run to the proposed attenuation lagoon, where solids will be allowed to settle before the water is passed through a petrol interceptor in order to remove potential hydrocarbons before it is discharged to the existing roadside drain.

Foul drainage from the site is transported to the adjacent waste water treatment plant via the on-site pump station.

Runoff from wash bay and yard services is gathered in a grit sump (Klargester Grit Sump W1 040) and enters a washdown interceptor (Kingspan Interceptor NSFP 003) and then discharges into foul sewer which discharges to the pump station and on to the adjoining public wastewater treatment plant

The proposed fire station will follow standard practices for storage at Irish fire stations and consist of:

- Kerosene (for boiler)
- Diesel (fuel in the fire appliance and 4 x 4 vehicle)
- Petrol (Relatively small quantities for fuelling small plant for e.g., chainsaws, generators, power pack units for hydraulic cutting equipment, power washer.)
- Domestic cleaning products
- Industrial spillage absorbent granules approximately 30- 40 no. kept in stock (10 kg bags)
- Fire extinguishing agent approx. 30 drums kept in stock (20 litre drums on bunded crate).

3. Legislative Basis for EIA

EIA requirements derive from the EIA Directive (Directive 2011/92/EU as amended by Directive 2014/52/EU) on the assessment of the effects of certain public and private projects on the environment. As the amended Directive came into force on 16th May 2017 and regulations transposing it into national legislation have been enacted. No changes to the prescribed project types or thresholds are required under the amended Directive so the types and thresholds set out in the 2001-2010 Regulations remain in effect.

EIA legislation as it relates to the planning process has been largely brought together in Part X of the Planning and Development Acts 2000, as amended and Part 10 and Schedules 5, 6 and 7 of the Planning and Development Regulations 2001, as amended. Part 1 of Schedule 5 to the Planning and Development Regulations lists project types included in Annex I of the Directive which automatically require EIA. Part 2 of the same Schedule, lists project types included in Annex II. Corresponding developments automatically require EIA if no threshold is given or if they exceed a given threshold. Developments which correspond to Part 2 project types by are below the given threshold must be screening to determine whether they require EIA or not. This is done by consideration of criteria set out in Schedule 7.

4. Screening Considerations

4.1 Project Type

Class of Development

In the first instance, it is necessary to determine whether the project is of a type (or 'class') that requires an EIAR. This project does not correspond to any of the prescribed types listed in Annex I. However, it could be considered to correspond to the Infrastructure Projects type set out in Annex II, as discussed below.

Infrastructure Projects

Schedule 5, Part 2 of the Planning and Development Regulations, 2001, as amended includes this project type:

- 10. Infrastructure projects
- (b) (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 EU Guidance on 'Interpretation of definitions of project categories of Annex I and II of the EIA Directive' (2015) interprets 'urban development' as taking 'account of, inter alia, the following:

- i. Projects with similar characteristics to car parks and shopping centres could be considered to fall under Annex II (10)(b). This could be the case, for example, of bus garages or train depots, which are not explicitly mentioned in the EIA Directive, but have similar characteristics to car parks.
- ii. Construction projects such as housing developments, hospitals, universities, sports stadiums, cinemas, theatres, concert halls and other cultural centres could also be assumed to fall within this category. The underlying principle is that all these project categories are of an urban nature and that they may cause similar types of environmental impact.
- iii. Projects to which the terms 'urban' and 'infrastructure' can relate, such as the construction of sewerage and water supply networks, could also be included in this category.

The overall area of the proposed development is 0.367 hectares. The site is not located within a 'business district' although an argument could be made that it is within the built up area of Manorhamilton. This corresponds to less than 4% of the 10 hectare threshold which applies in the case of a built up area. the site is very much on the outer edge of the town and there is no contiguous development between the site and adjoining utilities with the settlement. It is however partially contained within the development envelope of the town as defined by the land use zoning objective maps of the current County Development Plan 2015-2023 and fully within the development envelope of the town in the draft County Development Plan 2023-2029.

Therefore the proposal may be considered as a prescribed project type but is considered significantly below the stated threshold. The project would not therefore require the undertaking of an EIA.

4.2 Sub-threshold Development

Article 92 of the Regulations of 2001, as amended define 'sub threshold development' :as:

development of a type set out in Part 2 of Schedule 5 which does not equal or exceed, as the case may be, a quantity, area or other limit specified in that Schedule in respect of the relevant class of development.

Annex III of the EIA Directive (2011/92/EU, as amended) as transposed into Schedule 7 of the Planning and Development Regulations, sets out criteria for review of sub-threshold projects to determine if they should be subject to EIA. These criteria include characteristics, location and potential impacts.

This screening proceeds to consider the proposed development against the Schedule 7 criteria. Schedule 7 specifies 'Criteria for determining whether a development would or would not be likely to have significant effects on the environment' under these three headings:

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

The criteria are listed in the table below. The comments provided in relation to the category 1 and 2 criteria are factual and do not comment on the types or characteristics of impacts. In keeping with the intent of Schedule 7, commentary on impacts is provided in response to the items covered by category 3 (in the third part of the table below). All comments, particularly regarding 'significance', are made in the context of the Directive and guidance. Cross references are included where useful. The review against the Schedule 7 criteria refers to and takes account of the prescribed environmental factors, as relevant.

Schedule 7A of the Planning and Development Regulations sets out 'Information to be provided by the Applicant or Developer for the Purposes of Screening Sub-threshold Development for Environmental Impact Assessment'. This information includes:

- 1. A description of the proposed development
- 2. A description of the aspects of the environment likely to be significantly affected by the proposed development.
- 3. A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment
- 4. The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7.

This screening report includes the relevant Schedule 7A information. This is contained in section 2 above and in the commentary provided in the table below.

SHEDULE 7 CRITERIA		Commentary
1. Characteristics of Proposed Development	(a) the size and design of the whole of the proposed development	The proposed development extends to an area of approximately 0.4 hectares.
The characteristics of proposed development, in particular:	(b) cumulation with other existing development and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment	The proposed project will be part of Leitrim County Council's Emergency Services. It is located on a standalone site acquired for this intended purpose. Due to its nature and scale, it has no
		characteristics that would have potential to cause environmental impacts that could be significant when combined with impacts from other existing developments. There is no other project which has been the subject of an application for consent within the past 5 years.
	c) the nature of any associated demolition works	No demolition works are required.
	(d) the use of natural resources, in particular land, soil, water and biodiversity	No significant natural resources will be used.
	(e) the production of waste,	No significant waste streams will be generated.
	(f) pollution and nuisances,	No significant pollution or nuisances will be caused.
	(g) the risk of major accidents, and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge	There is no significant potential for the proposed development to give rise to significant adverse effects on the environment due to accidents and/or disasters. This applies to accidents/disasters arising from external factors as well as accidents arising from the development.

SHEDULE 7 CRITERIA		Commentary
2.Location of proposed development The environmental sensitivity of geographical areas likely to be affected by the proposed development, with particular regard to—:	(a) the existing and approved land use	The former use of the fenced off portion of the site was agricultural. It has no meaningful use since acquired by the Local Authority. It is presently not zoned for any use within the County Development Plan 2015-2023 with the area outside and adjoining the access road zoned for 'Sewerage Treatment Plant'. In the draft County Development Plan 2023-2029, the entire site and that of the adjoining wastewater treatment plant and civic amenity site are zoned for 'Utilities'.
	(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground	There are no significant natural resources at the development site. The impacts are anticipated to be negligible given the scale of the proposed development.
	(c) the absorption capacity of the natural environment, paying particular attention to the following areas:	
	(i) wetlands, riparian areas, river mouths;	The site is not identified as constituting wetlands; it has been classified as wet grassland habitat and semi improved grassland. There is no significant watercourse within or adjoining the development site other than peripheral drainage ditches.
	ii) coastal zones and the marine environment	N/A
	(iii) mountain and forest areas	N/A
	(iv) nature reserves and parks	N/A
	(v) areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive	The site is contained within the Lough Gill Special Area of Conservation (Site Code 001974). A number of qualifying interests which could be affected by water quality impacts or disturbance impacts were identified. A Natura Impact Statement was prepared and accompanies this application. The proposed mitigation measures

	presented therein eliminate the potential for adverse effects on this designated site.
(vi) areas in which there has already been a failure to meet the environmental quality standards laid down in legislation of the European Union and relevant to the project, or in which it is considered that there is such a failure.	None relevant to the characteristics of the scheme.
(vii) densely populated areas	The site is on the edge of the town of Manorhamilton and could not be considered within a densely populated area
(viii) landscapes and sites of historical, cultural or archaeological significance	There are no recorded monument or known archaeological or culturally significant sites within or adjacent to the proposed development. There is no Area of Outstanding Natural Beauty or High Visual Amenity Area affected by the proposed development.

SHEDULE 7 CRITERIA		Commentary
3. Types and characteristics of potential impacts The likely significant	a) the magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected)	The proposed development extends to an area of approximately 0.4 hectares. The proposed development does not adjoin any residential development.
effects on the environment of proposed development in relation to criteria set out under paragraphs 1 and 2, with regard to the impact of the project on the factors specified in	(b) the nature of the impact	The works will be undertaken adjoining a built urban landscape, adjoining a wastewater treatment plant and civic amenity site. All such uses are considered compatible with each other. All works are identified as small in relative scale and are expected to be
paragraph (b)(i)(I) to (V) of the definition of 'environmental impact assessment		negligible and/or temporary in source emissions due to the characteristics and nature of the use.
report' in section 171A of the Act, taking into account—		The level of potential noise, dust and surface water effects during construction of the development can be reasonably anticipated to be within the normal range of effects that would be expected during a small scale construction project.
		Any impacts on landscape and amenity can be expected to be neutral, due to the design and nature of adjoining uses.
		Impacts are not likely to be significant, within the meaning of the EIA Directive.
	(c) the transboundary nature of the impact	N/A
	(d) the intensity and complexity of the impact	Construction impacts will be temporary and of low intensity and complexity.
	(e) the probability of the impact	Temporary environmental impacts will occur. These are not likely to be significant, within the meaning of the Directive.

f) the expected onset, duration, frequency and reversibility of the impact

(g) the cumulation of the impact with the impact of other expected onset, duration, and impacts during construction will be temporary to and will be permanent thereafter. These are not likely to be significant, within the meaning of the Directive.

As noted at 2(a) above, there are a number of other existing projects in

(g) the cumulation of the impact with the impact of other existing and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment

As noted at 2(a) above, there are a number of other existing projects in the locality, however none of these have potential to contribute to significant effects when considered in-combination with the effects of the proposed scheme and within the meaning of the Directive.

(h) the possibility of effectively reducing the impact

As there is no potential for the proposed development to cause significant impacts, within the meaning of the Directive, the possibility of effectively reducing the impact is not relevant. It can be assumed that normal best practice measures will be employed to ensure that any minor (insignificant) and temporary construction stage impacts will be appropriately controlled.

Based on review against the Schedule 7 criteria, the environmental impacts of the proposed project can be anticipated to be temporary and not likely to be significant within the meaning of the Directive.

5. Conclusion

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.

Bernard Greene, Senior Planner, Leitrim County Council

Appendix A – Site Layout Plan

