

**Environmental Impact Assessment
Screening Report
Proposed Large-scale Residential
Development**

**On Behalf of
Wrightwood Developments**

at

Ardshanavooly, Killarney, Co. Kerry



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Title: Environmental Impact Assessment Screening Report, Proposed Large-scale Residential Development, Ardshanavooly, Killarney, Co. Kerry on behalf of Wrightwood Developments

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Revision Record

Issue No.	Date	Description	Remark	Prepared	Checked	Approved
01	13/01/26	Report	Final	FML	GE	KB

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Proposed Large-scale Residential Development
Wrightwood Development Ltd.
Ardshanavooly, Killarney, Co. Kerry

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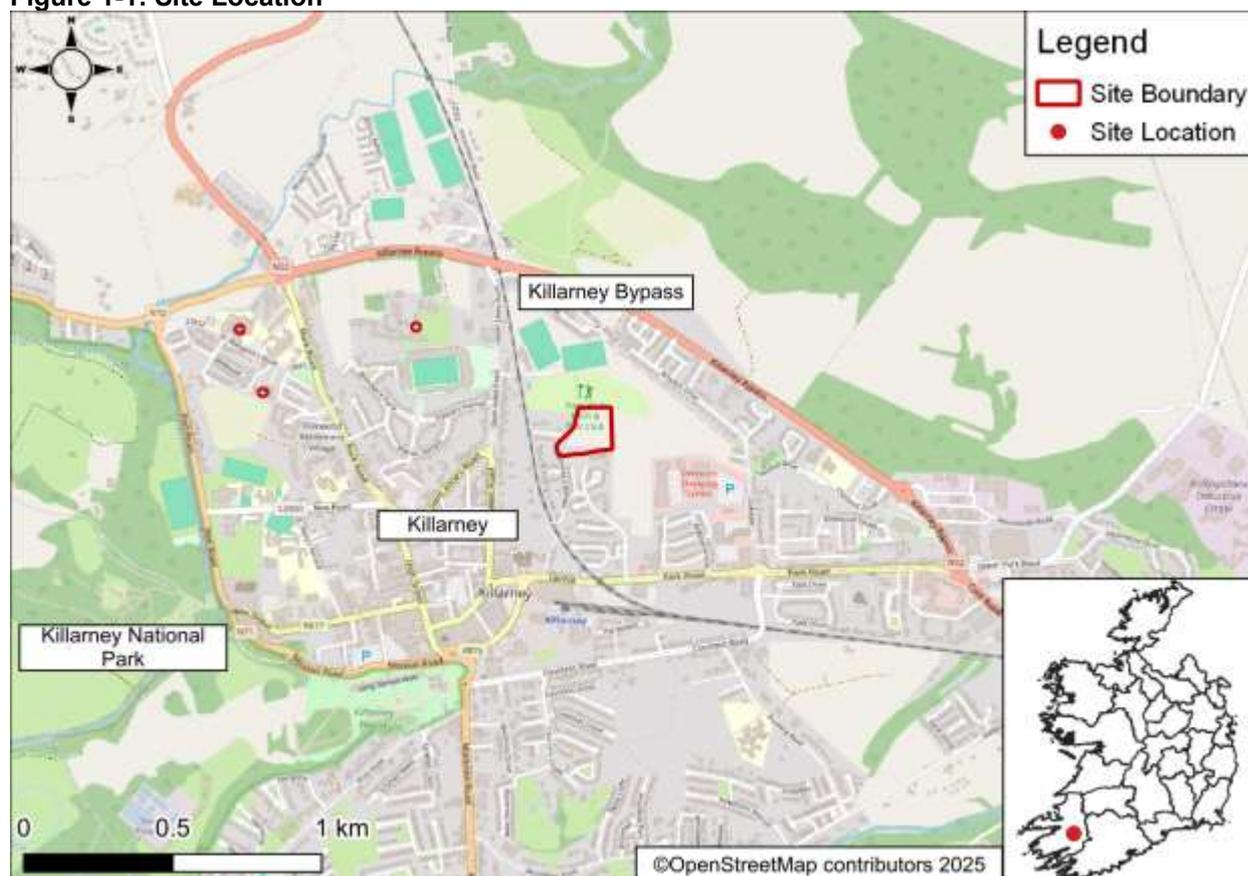
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1 INTRODUCTION

Malone O'Regan Environmental ('MOR Environmental') was commissioned by Wrightwood Developments ('the Client') to undertake an Environmental Impact Assessment ('EIA') Screening Report. This report considers the proposed residential development all ancillary works ('Proposed Development') on greenfield lands at Ardshanavooly, Killarney, Co. Kerry ('the Site'). The Site is circa ('ca.') 2.23 hectares ('ha') in size and its location is shown below in Figure 1-1.

Figure 1-1: Site Location



1.1 Scope

This EIA Screening report has been prepared to consider the requirement, or otherwise, of carrying out an EIA in respect of the Proposed Development. This screening exercise was undertaken in two stages:

- Stage 1 considers the requirement for a mandatory EIA; and,
- Stage 2 considers the requirement for a sub-threshold EIA.

As part of the sub-threshold screening exercise, the potential for the Proposed Development to have significant effects on the environment was assessed.

This EIA Screening Report was submitted as part of the overall planning submission.

1.2 Competent Person

The in-house MOR Environmental project team included the following competent professionals:

Table 1-1: MOR Environmental In-House Project Team

Name and Qualification	Project Role	Relevant Competencies	Relevant Experience
Gus Egan BSc (Hons), MSc, AIOA, Associate AACI	Principle Environmental Consultant	Acoustics (Noise and Vibration) EIA Specialist	7+ years environmental and acoustic assessment, monitoring, and modelling, working on EIAR, and specialist impact assessments in Ireland and the UK.
Kathryn Broderick	Principle Environmental Consultant	Biodiversity	8+ years in ecology consulting in support of EIA and AA
Kenneth Goodwin, BSc, Full Member IOA, Full member AACI, ISEP Practitioner	Associate Director, Acoustics	Acoustics (Noise and Vibration) EIA Specialist and Planning Specialist	15+ years' experience in environmental acoustic assessment, monitoring and modelling, working on EIAR, and specialist noise impact assessment in Ireland and the UK.
Dyfrig Hubble, BSc, MSc, CIEEM Full Member	Associate Director, Ecology	Biodiversity	Dyfrig is an Ecological consultant with 15+ year experience in undertaking Ecological Impact Assessments.

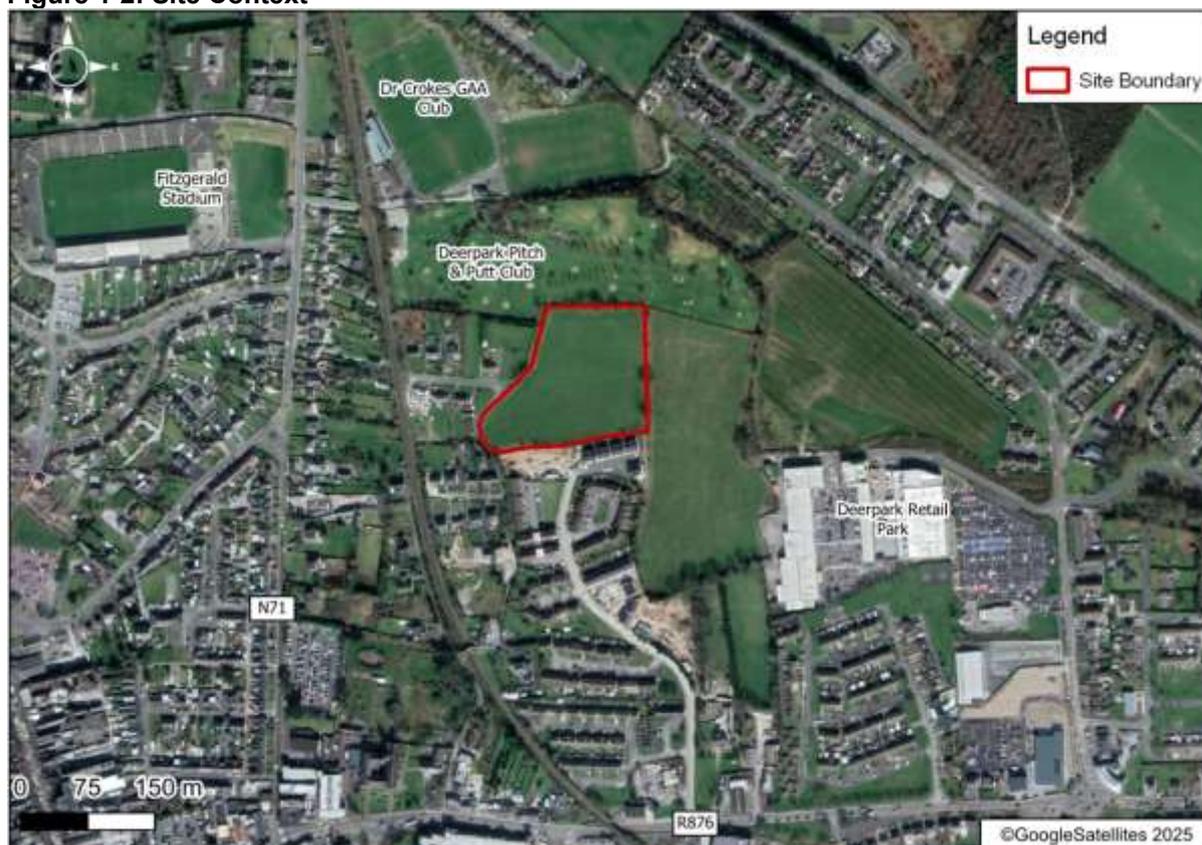
1.3 Site Context and Background

The Site is located on the outskirts of Killarney town. The Site is accessed via the local road, 'Dennehy's Bohereen', via the regional road R875, which connects to the national roads N71 and N22 (the 'Killarney Bypass'). The N22 is the main road connecting County Kerry and Cork City in County Cork.

The Site is a greenfield site comprised entirely of agricultural grassland. The Site is bordered to the west by existing residential properties, followed by the Iarnród Eireann Railway (South Kerry Line: Mallow-Cobh) and further residential properties. The Site is bordered to the east by agricultural grassland, followed by the Deerpark Shopping Centre and residential properties. The Site is bordered to the south by existing residential properties.

The Deerpark Pitch & Putt Club is located to the north of the Site, followed by Dr. Crokes GAA Club, further residential properties and the National Road N22. The surrounding area is a mix of private residential properties, commercial properties and sports venues such as Fitzgerald Stadium and the local GAA club. Refer to Figure 1-2 for context

Figure 1-2: Site Context



1.4 Development Context

A review of the Site, in relation to the Proposed Development under the policies and objectives of both the Kerry County Development Plan 2022-2028 ('CDP') and Killarney Town Development Plan.

1.4.1 Kerry County Development Plan 2022-2028

The CDP was adopted by Kerry County Council ('KCC') on 4th July 2022 and came into effect on 15th August 2022 [1]. Kerry is located on the southwest coast of Ireland in Munster, bordering Limerick and Cork. The county possesses a diverse range of landscapes, including extensive areas of impressive coastlines and sizeable mountain ranges, including Ireland's highest mountain peak, Carrauntoohill. Through its geographical location, Kerry has strong economic, educational, cultural and access links to both Limerick and Cork.

The vision for the county set out in the CDP is as follows [1]:

"The Vision is to provide for the development of County Kerry as an attractive, competitive and sustainable place to live, visit and do business, and where the quality of employment and educational opportunities, natural and built environment, cultural experiences and the strength and viability of its rural and urban communities are to the highest standards."

Killarney is designated as a 'Key Town' within the CDP [1]. The Core Strategy for Key Towns in County Kerry is:

"To prioritise the sustainable development of the Key Towns of Tralee and Killarney with the Kerry Hub and Knowledge Triangle in line with the RSES."

Under the current CDP, the following Sustainable Communities objectives in Table 1-2 below are related to the Proposed Development [1]:

Table 1-2: Relevant Sustainable Communities Objectives.

Objective No.	Description
6-1	Develop and support vibrant sustainable communities in Kerry where people can live, work, and enjoy access to a wide range of community, health, educational facilities, and amenities, suitable to all ages and needs, in both urban and rural areas, thereby supporting an enhanced quality of life for all people
6-2	Support the provision and distribution of a range of community infrastructure facilities in accordance with the Settlement and Core Strategies to meet the needs of the County's population structure in conjunction with other statutory, voluntary, private sector agencies and community groups
6-3	Continue to support the creation of sustainable communities throughout the County by facilitating the creation of attractive neighbourhoods where there are strong links and connections to local services, community facilities and employment areas and where walking, cycling, and public transport is prioritised and which supports the retention of existing ecological features and supports the planting of native species in green and public areas.
6-6	Require new buildings to achieve the Nearly Zero-Energy Buildings (NZEB) standard in line with the Energy Performance of Buildings Directive (EPBD).
6-15	Facilitate the provision of suitable housing for people with specific needs in their local communities through actively providing / assisting the provision of housing in settlements.
6-16	Have regard to and promote increased residential densities in the towns and other appropriate locations in accordance with the 'Sustainable Residential Development in Urban Areas' Guidelines 2009 (DoEHLG).
6-17	Promote integration of social housing and ensure a housing mix within developments in order to promote a socially balanced and inclusive society
6-18	Ensure that housing developments are completed to a standard that is in accordance with Kerry County Council's Taking in Charge Policy for Private Housing Developments.

In accordance with the overall vision of the CDP and Housing for All, it is the policy of the KCC to [1]:

- *“Support the pathways identified in Housing for All to ensure that everyone in the County should have access to a home to purchase or rent at an affordable price, built to a high standard and in the right place, offering a high quality of life. To encourage greater levels of residential occupancy in town and village centres and to ensure our towns, village and rural areas sustain their population and are vibrant places in which to live;*
- *Encourage and foster the creation of attractive mixed-use sustainable communities which contain a variety of housing types and tenures with supporting community facilities, public realm and residential amenities. To ensure that sufficient land is zoned for various types of housing over the lifetime of the Plan;*
- *Require a high standard of design in all new residential schemes that are built in a style and scale that is appropriate to the landscape/urban setting;*
- *Integrate new housing into the existing social and urban fabric of the County's settlements;*
- *Recognise the need for people with disabilities to enjoy a decent living environment in the County and to support local communities, health authorities and other agencies involved in the provision of facilities to people with disabilities;*

- *Support the concept of independent living for older people and people with disabilities and ensure where possible that housing for such groups is integrated into mainstream housing in their existing communities;*
- *Provide appropriate accommodation for the Traveller Community, minority ethnic groups, migrant groups and homeless;*
- *Ensure that all new housing is designed in a way that is adaptable and flexible to the changing needs of the homeowner, and has regard to the Department of Environment, Community and Local Government ‘Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities (2007);*
- *Support a sequential approach to residential development in which the first-choice location for new housing is within the built-up area of towns and villages, while maximising under-utilised infill and brownfield lands within town and village centres;*
- *Facilitate consultation with approved Voluntary and Co-operative Housing Associations on an ongoing basis in order to identify and agree opportunities for their participation in the provision of all social housing delivery options; and,*
- *Promote rainwater harvesting and energy efficiency both during the construction phase and during the lifetime of residential development by sensitive design and layout taking into account topography, orientation and surrounding features.”*

Under the current CDP, the following housing objectives in Table 1-3 below are related to the Proposed Development [1]:

Table 1-3: CDP Housing Objectives

Objective No.	Description
7-1	Prepare a housing Delivery Action Plan in accordance with Housing for All and deliver on the actions outlined therein over the lifetime of the Plan to supply adequate levels of social and affordable housing to ensure all sectors of society have access to housing including a range of accommodation types for members of the traveller community, the homeless, people with disabilities and ethnic minority groups.
7-2	Implement the policies contained in Housing for All to increase Social Housing delivery in the County.
7-3	Utilise Public Private Partnerships (PPPs) to deliver social housing.
7-6	Facilitate the housing needs of people in their local communities through actively providing / assisting the provision of housing in settlements as identified in the Settlement Strategy and the Housing Strategy
7-8	Have regard to and promote increased residential densities in the towns and other appropriate locations in accordance with the policies of the NPF, RSES, Housing for All and the ‘Sustainable Residential Development in Urban Areas’ Guidelines 2009 (DoEHLG).
7-10	Ensure that housing developments are completed to a standard that is in accordance with Kerry County Council’s Taking in Charge Policy for Private Housing Developments

1.4.2 Killarney Town Development Plan

Killarney is located on the shores of Lough Leane and at the foot of the north-eastern end of the Macgillcuddy’s Reeks and is adjacent to the Killarney National Park. The vision for Killarney is:

“To create an attractive location to live, work and visit. It seeks to mirror the natural environment of Killarney National Park with an exceptional urban experience that sets Killarney apart as a world class tourism destination. It seeks to interweave the fabric

of the Urban Core of Killarney seamlessly into the National Park so as to strengthen the role of Killarney as a centre of excellence in tourism, recreation and amenity, creating an attractive location to develop training and education centres of excellence.”

The Regional Spatial and Economic Strategy (‘RSES’) regional policy objective (‘RPO’) 18 identifies the strategic pathway for sustainable development of Killarney:

- a) *“To sustainably strengthen the role of Killarney as a strategic located urban centre of significant influence in a sub-regional context, a centre of excellence in tourism, recreation and amenity sectors, to promote its role as a leader in these sectors, in particular training and education and strengthen its overall multi-sectoral dynamic as a key settlement in the Kerry Hub Knowledge Triangle accessible to regional airport, port, rail and road assets;*
- b) *To seek investment to sustainably support its compact growth and regeneration, attributes and infrastructure, including key inter-regional connectivity (transport networks and digital) on the strategic road network between Cork and Limerick-Shannon Metropolitan Areas, the Atlantic Economic Corridor and the Kerry Hub Knowledge Triangle;*
- c) *To strengthen ‘steady state’ investment in existing rail infrastructure and seek investment for improved infrastructure and services to ensure its continued renewal and maintenance to a high level in order to provide quality levels of safety, service, accessibility and connectivity;*
- d) *To support infrastructure investment and the regeneration of opportunity sites including the Sara Lee, Aras Phadraig and St Finians;*
- e) *To seek investment in infrastructure that provides for both the resident population and extensive influx of visitors;*
- f) *To support investment in infrastructure and the development of lands to the north of the existing by-pass in accordance with proper planning and sustainable development objectives including the appropriate master plans in consultation with statutory stakeholders; and,*
- g) *Future growth of the town should be planned for on a phased basis in consultation with the Local Authority and Irish Water to ensure that sufficient wastewater capacity is accounted for and that further growth avoids negative impacts on the downstream freshwater ecosystem in the National Park (River Deenagh, Lough Leane)”.*

The National Planning Framework, Ireland 2040, targets a significant proportion of future urban development on infill and brownfield development sites within the built envelope of existing urban areas. It is envisaged that 30% of new housing in Killarney will be on infill and brownfield sites. The core strategy estimates a population growth of 1,630 persons over the lifetime of the CDP, which equates to 1,277 residential units [2].

Under the current Town Development Plan, the following objectives in Table 1-4 below are related to the Proposed Development:

Table 1-4: Relevant Objectives for the Proposed Development

Objective No.	Description
KA 1	Plan for and facilitate the development of Killarney in accordance with RSES RPO 11 & RPO 18.
KA 5	Ensure that the town is attractive, liveable, vibrant, and a well-designed urban place with diverse and integrated communities enjoying a high quality of life and promote an enhanced sense of place, liveability and personal wellbeing.

The Site is zoned as “New/proposed Residential Phase 1” (see Figure 1-3 above). The objective and description set out in the Land-Use Zoning for this zone are as follows:

The objective of the zoning:

“Provide for new residential development in tandem with the provision of the necessary social and physical infrastructure.”

The description of the zoning:

“For new residential areas/town extensions to ensure the provision of high quality new residential environments. Provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities. May also include a range of other ancillary uses for residential, particularly those that have the potential to foster the development of new residential communities.”

1.5 Study Area

The study area for each environmental aspect is different based on the relative predicted potential impacts. The basis for the study area specific to each environmental aspect is shown in Table 1-5 below.

Table 1-5: Study Area

Study Area	Study Area Extent	Basis of Study Area Extent
General, surrounding lands	2km diameter	Describing the lands surrounding the site in terms of geography, infrastructure and industry, archaeology and cultural heritage, county development plan and planning permissions. A 2km diameter is considered sufficient due to the nature, type, and size of the Proposed Development, as well as the nature of its surroundings, as it is considered that there is no potential for a significant effect beyond this area when considered in the context of the surrounding area.
Noise emissions	For operational noise emissions 500mx500m grid was defined in the noise model	The modelling grid size was selected in accordance with modelling guidelines provided in the EPA’s NG4 [3]. The grid size ensured that all sensitive receptors (or their proxy locations) identified would be included, and thus the potential impact from the Proposed Development determined. There is no potential for a significant effect beyond this grid.
Biodiversity	15km diameter overall study area For potential air quality and noise emission related impacts on biodiversity, see lines above for study area	Study area (also referred to as Zone of influence in biodiversity assessments) guidance from the National Parks and Wildlife Service (‘NPWS’) recommends that the distance should be evaluated on a case-by-case basis with reference to the nature, size, and location of the project; the sensitivities of the ecological receptors and the potential for in-combination effects (cumulative). Due to the type and size of the Proposed Development, and the extent and characteristics of emissions, the Proposed Development is not considered to have zone of influence extending to 15km, nonetheless, conservatively, all Special Protection Areas (‘SPAs’) and Special Areas of Conservation (‘SACs’) in 15km have been identified for consideration as part of the screening. There is no potential for a significant effect beyond this area.
Archaeology and Cultural Heritage	Within the Site Boundary to ca. 250m from the Site.	The study area has been defined in respect of two factors: <ul style="list-style-type: none"> the ability of sites / information sources to provide information pertaining to the archaeological potential of the Proposed Development site, and, the potential physical impact, as well as impact on the setting, that the proposed scheme may have on sites of cultural heritage significance.

1.6 Relevant Planning History

A review and search of the KCC planning site revealed no previous or current planning applications for the Site, as shown in Figure 1-3 below, which displays all planning applications within the previous five years local to the Site.

In the study area surrounding the Site, the majority of planning applications relate to residential dwellings and retail / amenity projects.

There are currently two similar developments that have planning permission granted or are currently under construction that could impact the Proposed Development or be impacted by the Proposed Development in terms of cumulative impacts (See Planning Reference No. 318509 and 2460295 in Table 1-6 below).

Table 1-6: Offsite Planning History

Planning Reference Number	Planning Authority	Decision	Date of Final Planning Decision	Description
18221 / 302939	KCC / An Bord Pleanála	Granted	15/03/2019	"Erection of 10 semi-detached houses and all associated works."
19516	KCC	Conditional	13/01/2020	"To construct a dwelling house with effluent treatment tank and polishing filter."
19925	KCC	Conditional	16/03/2020	"(1) Construct a two storey house and septic tank (outline permission ref no. 17/54) (2) Permission to construct a shed."
20241	KCC	Conditional	17/07/2020	"Erect 2 No. semi-detached dwellings and all associated site works."
201074	KCC	Conditional	12/01/2021	"(a) Permission consequent on the grant of outline permission (planning ref: 19516) to construct a two storey dwelling house with effluent treatment tank and polishing filter and (b) Permission to construct a domestic garage/out building including all necessary ancillary services works and site works."
211234	KCC	Conditional	21/21/2021	"Construct a dwelling house with connection to wastewater treatment system and all ancillary site works (outline planning ref 19/478). Permission to construct a domestic garage/shed."
201237	KCC	Conditional	20/01/2022	"(1) Retain existing in situ foundations, (2) Permission to construct 2 No. blocks of apartments consisting of 12 No. apartments in Block A and 6 No. apartments in Block B to be serviced with a new access road and all ancillary site works."
211178	KCC	Conditional	07/04/2022	"(a) Retain 9 no. townhouses as constructed previously granted under planning reg. no. 18222 and abp-302942-18 within revised site boundaries (b) Planning permission to complete the no. 9 townhouses (c) Planning permission for change of design of 6 no. of semi-detached previously granted under planning reg. no. 18222 and abp-302942-18 and all ancillary site services."
23991	KCC	Conditional	15/12/2023	"(a) Construct children's creche, (b) Planning permission to construct 14 in number 1 bedroom and 2 in number 2 bedroom apartments, (c) New access

Planning Reference Number	Planning Authority	Decision	Date of Final Planning Decision	Description
				road, parking and all associated site works within revised site boundaries.”
23967 / 318509	KCC / An Bord Pleanála	Conditional	21/03/2024	“Construct 249 no. dwellings comprising of 2 no. 5-bed houses, 117 no. 3 bed houses, 18 no. 2-bed houses, 68 no. 2-bed apartments and 38 no. 1-bed apartments. All houses and apartments are contained in two storey buildings in height and comprise a mix of terrace and semi-detached typologies. House Type F (4-bed semi-detached) and House Type G (5 bed semi-detached) include residential accommodation at attic/second level with associated rooflights. The apartments include balconies/ground floor terraces as private open space provision. The development includes public open space including play facilities, a new vehicular access from upper park road, all internal roads and footpaths including a number of home zones/shared surfaces, boundary treatment and hard and soft landscaping, drainage works for the new development and all associated and ancillary works. the proposed development also includes a new two-way cyclepath and a footpath along upper park road, with pedestrian crossings on upper park road, a two storey creche of c. 417 sq.m gross floor spacw with associated open space and pv panels at roof level:510 no. surface car parking spaces (including accessible spaces) for the residential development and 19 no. surface car parking spaces for the creche, 352 no. bicycle parking spaces are provided in secure facilities for the maisonette units to the rear of each units to the rear of each unit. A Natura Impact Statement has been prepared in respect of the proposed development.”
24320	KCC	Conditional	25/09/2024	“(a) Change of use of carparking area and bin storage area to 2 no. one bedroom apartments and 1 no. one bedroom accessible apartment, located on the ground floor, (b) Minor elevational changes, namely, the installation of a pitched roof between apartments no’s 5 and 6 relocation of a window at the rear elevation on 1st floor to side elevation of apartment no.11, (c) Relocation and increase of bike storage area, all as previously granted under planning ref no 23/991.”
2460295 / 320288	Kerry County Council / An Coimisiún Pleanála	Conditional	12/11/2024	“The construction of a residential development of: 224 no. residential units with ancillary two storey crèche, landscaping, road improvements, pedestrian / cycleways, storm water upgrades and associated site development works. The proposed development makes provision for 76 houses comprising of 8 no. 2-storey 2-bedroom townhouses, 28 no. 2-storey 3-bedroom townhouses, 10 no. 2-storey 3-bedroom semi-detached units and 30 no. 2-storey 4-bedroom semi-detached units. The proposed development includes 148 no. apartments / duplexes to be provided as follows: Block 1 (4 no. 2-bedroom & 4 no. 3-bedroom over 3 storeys), Block 2 (2 no. 2-bedroom & 2 no. 3-bedroom over 3-storeys), Block 3 (4 no. 1-bedroom, 10 no. 2-bedroom and 6 no. 3-bedroom over 3-storeys), Block 4 (10 no. 1-bedroom & 10 no. 2-bedroom over 3-storeys), Block J (32 no. 2-bedroom over 4 storeys), Block K (16 no. 1-bedroom apartments

Planning Reference Number	Planning Authority	Decision	Date of Final Planning Decision	Description
				& 16 no. 2-bedroom apartments over 4 storeys) Block L (32 no. 2-bedroom apartments over 4 storeys). The proposed development will provide for a new vehicular access and pedestrian entrances onto Port Road, upgrades to Port Road comprising reduction in carriageway widths, provision of shared pedestrian/cycle path and uncontrolled pedestrian crossing, and a pedestrian connection to Millwood Estate. It is proposed to upgrade the stormwater network on St. Margaret's Road (approximately 140 metres north of the main development site) to support the development. Ancillary infrastructure development works will include relocation/undergrounding of ESB powerlines, wastewater infrastructure including foul pumping station, surface water attenuation, water utility services, public lighting, bin stores, bicycle stores, ESB substations, and all associated site development works. A Natura Impact Statement has been prepared in respect of the proposed development."
2560046	KCC	Conditional	27/03/2025	"Planning Permission to Construct a revised design Children's Creche, parking and all associated site works as previously granted under Planning reg number 23/991."

Figure 1-3: Relevant Planning Applications within the Vicinity of the Site



1.7 Need for the Proposed Development

The National Planning Framework ('NPF') plans for a projected 1 million increase in our national population, 550,000 more homes and an additional 660,000 jobs by 2040 [4]. The NPF is designed to enable people to live closer to where they work, maximise return on public investment and direct a shift away from current unsustainable spatial growth patterns.

Killarney currently has a population of 15,487. The core strategy of the CDP estimates a population growth of 1,630 persons over the lifetime of the CDP, which equates to 1,277 residential units. The primary need for the Proposed Development is to provide adequate residential dwellings and relevant services for the projected growing population of Killarney.

Additionally, this development aims to enhance social opportunities in the area and align with relevant policies and objectives set out in Section 1.4 above.

2 THE PROPOSED DEVELOPMENT

2.1 Proposed Development

The Applicant intends to apply for permission for development at Ardshanavooly, Killarney, Co. Kerry. The development will consist of the following:

1. Construction of a 124 no. dwellings in a mix of duplex, maisonette and apartment typologies comprising 16 no. 1 bed apartments, 6 no. 2 bed apartments, 16 no. 1 bed duplex apartments, 16 no. 2 bed duplex maisonettes, 33 no. 2 bed duplex apartments, 33 no. 3 bed maisonettes and 4 no. 3 bed terrace houses, all in building heights ranging from 2 to 4 storeys.
2. A total of 143 no. surface car parking spaces, including 4 no. car-share parking spaces, 6 no. visitor spaces, and 5 no. assigned Part M/accessible spaces.
3. Bicycle parking comprising of 272 no spaces in total, comprising 118 no. spaces within the private open space of ground floor residential units and 102 no. spaces within secure sheltered structures and designated secure bicycle parking areas, and 52 no. short stay/visitor spaces.
4. 3,636 sq.m of public open space, including arrival pocket park, central pocket park and amenity landscape areas (including 117 sq.m of play), grass lawns, kickabout areas, picnic areas and seating areas;
5. 956 sq.m of communal external open space, including seating areas, nature trails, and amenity grass lawns.
6. Additional environmental open space of 1,790 sq.m, including landscape buffers, protection and enhancement of existing hedgerows and trees.
7. A new vehicular, pedestrian and cyclist access from the existing estate road adjoining the site to the south.
8. Infrastructure works to serve the Proposed Development to include the internal road and footpath network, ESB cabinets/substations/switchrooms, site and external building lighting, site drainage works, hard and soft landscaping, boundary treatments, communal bin stores, and all ancillary site services and development works above and below ground.

Vehicular access to the Proposed Development will be via one new entrance located in the Carraig Midhe estate to the south of the Site. The Proposed Development also includes a separate pedestrian entrance at the southeast corner of the Site via Corbally Road.

Please refer to the Proposed Site Layout Plan, Drawing No. 924-008K-02-L00-DR-RAE-AR-103, submitted with the planning application.

Figure 2-1: Proposed Site Layout



2.2 Drainage and Services

An Engineering Assessment and Drainage Design Report was prepared by Teicniuil-Priory Consulting Engineers Ltd. and submitted as part of this planning application. Please refer to this report for full drainage details.

2.2.1 Surface Water

It is proposed that no surface water will be discharged from the Site to the existing public drainage network. It is proposed to treat all surface water on-site. Should any controlled surface water flow discharge from the Site be required, this will be limited to greenfield run-off rates.

2.2.2 Sustainable Urban Drainage Systems ('SuDS')

The Proposed Development has been assessed in relation to the SuDS Construction Industry Research and Information Association ('CIRIA') Manual C753 [5]. The proposed drainage system aims to replicate the natural characteristics of rainfall run-off, minimising the environmental impact from rainfall events by reducing the run-off leaving the Site for small rainfall events.

Based on the existing topography, the proposed Site layout, and the nature of the Proposed Development, alternative SuDS measures have been proposed to treat surface water runoff, replicate the natural characteristics of greenfield runoff, and minimise the environmental impact. The proposed SuDS are listed below:

- Soakaways;
- Attenuation tanks / crates;
- Swales;

- Permeable paving;
- Bio-retention area
- Petrol / Oil Interceptor;
- Detention Basins; and,
- Tree pits.

For further information, refer to the Teicniuil-Priory Consulting Engineers Ltd. Engineering Assessment and Drainage Design Report submitted as part of this planning application. Refer to Teicniuil-Priory Consulting Engineers Ltd. Drawing 91-24-0-210 for the proposed SuDS layout.

2.2.3 Stormwater

Whole on-site infiltration is proposed within the development, with no off-site discharge of stormwater to the public sewer.

Stormwater will be collected from the building roofs, via guttering, with discharge to rainwater downpipes – this above-ground drainage is to be designed to BS EN 12056-3:2000, *Gravity Drainage Systems Inside Buildings*. The receiving gullies are to be of the bottle type gullies (rather than P-trap Gullies); this facilitates ease of maintenance and provides an initial removal of silt and organic deposits from the roof area.

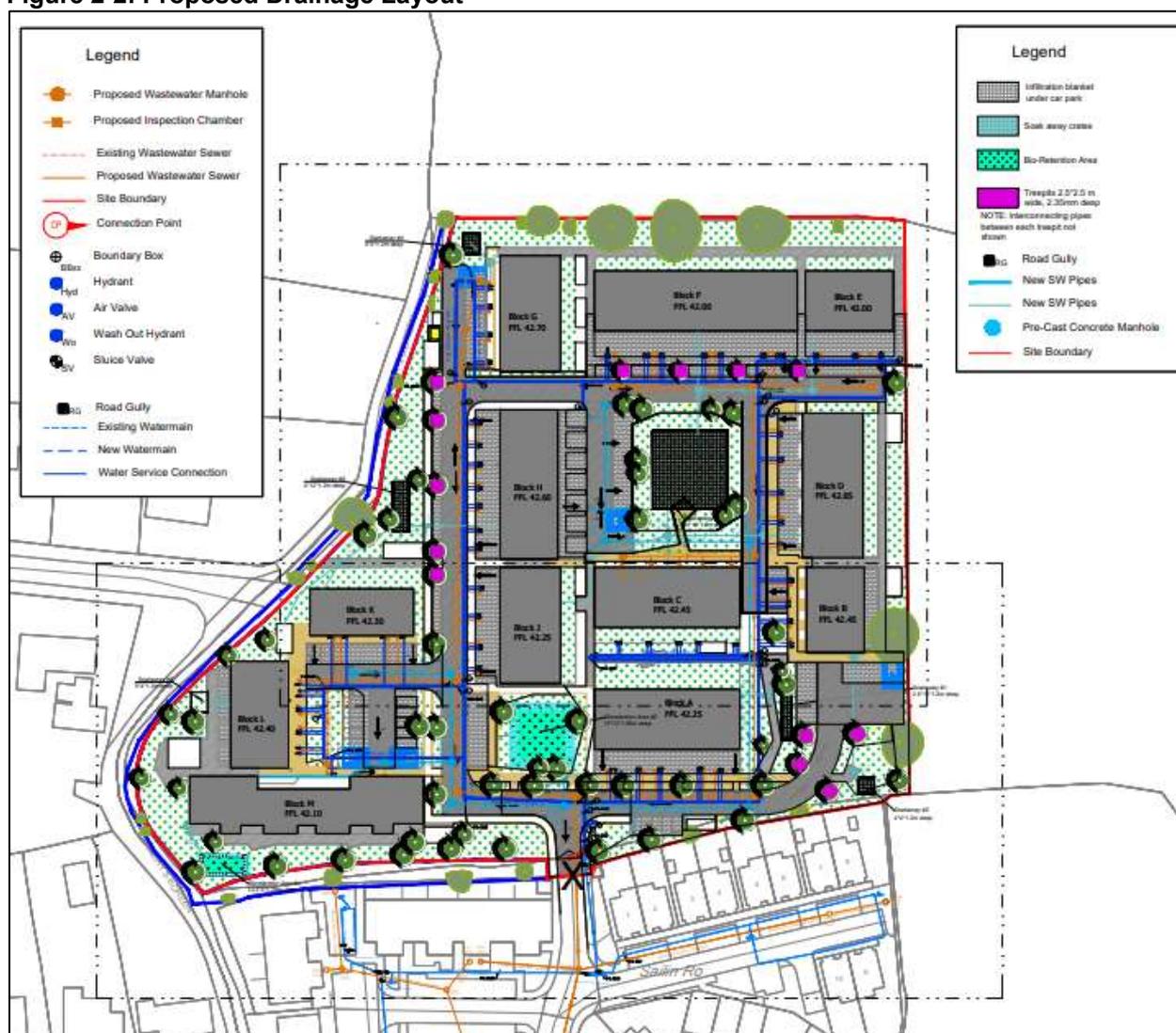
Thereafter, the stormwater is to be conveyed via 100mm dia PVCu pipes laid to a 1:60 gradient, bedded in suitable pea gravel, for a short run, linked to a larger 150mm dia pipe, via a saddle connection. This main drainage pipe will be connected either to an underground soakaway or a bioretention (rain garden) system, via a silt trap manhole, with a minimum 400mm silt trap base.

Stormwater from a portion of the road area will be conveyed via 'open channel' flow directly to individual tree pits. The stormwater from the remainder, larger portion of the road, is to be conveyed to a detention basin area, at the 'front' of the Site (south), via suitably sized PVC drainage pipes.

Carparking areas will discharge directly to the ground, via permeable paving, laid over a stone sub-base, with direct infiltration to the ground.

Please refer to Figure 2-2 below for the proposed drainage layout.

Figure 2-2: Proposed Drainage Layout



2.2.4 Foul Drainage

The proposed foul water drainage system is to be connected to the existing public mains system to the south of the Site. The final discharge pipe from the Development is sized at 225mm diameter, which had been sized for a peak flow of 4.89 L/s. This connects to an existing main sewer pipe 225mm in diameter, serving several small housing estates. The drainage pipe running around each block will be designed and sized to BS EN 12056-2:2000 – *Gravity Drainage Systems Inside Buildings*.

No stormwater run-off will enter the foul water system; all stormwater will be treated separately from the foul drainage system and will be designed and constructed to Irish Water Standards.

2.2.5 Water Supply

The proposed water supply system is to be connected to the existing Uisce Éireann water mains system to the south of the Site. It is proposed to provide a new 150mm (internal diameter) water connection to the public water main in the Saill Ardán estate with associated valves and metering requirements. Internally within the Proposed Development, it is proposed to have a series of 100mm branches and loops, along with associated hydrants, valves and metering requirements. Water distribution supply to each building will be sized to cater for the requirements of those particular uses. Metered connections will be made to the main in accordance with Uisce Éireann specifications and details.

All works will be in accordance with the Irish Water Code of Practice for Water Supply and the Water Infrastructure Standard Details Document Number: IW-CDS-5020-01.

2.2.6 Uisce Éireann

A feasibility application has been submitted to Uisce Éireann regarding the proposed foul water drainage. The foul water drainage system, which will be completely separated from the storm water drainage system, will be designed and constructed to Irish Water Standards. It is proposed to treat all surface water on-site. A Confirmation of Feasibility has been received from Uisce Éireann. Based on this pre-connection enquiry, Uisce Éireann deemed this proposal "*Feasible, without infrastructure upgrade*".

2.2.7 Site Access

Vehicular access to the Proposed Development will be via the existing road system currently serving the small residential estates of Friary Downs and Saill Ardán to the south of the Site. This will lead to the main Park Road R876.

This access point will be used for construction traffic and will form the main access point that will be used upon completion of the Proposed Development. All construction traffic, including construction plant, cars, vans and trucks, will be provided with on-site parking.

2.2.8 External Lighting

As the Site is located within a residential and public area, public lighting will be positioned accordingly within this scheme. All lighting will face away from existing residential developments, and away from ecological corridors such as boundary / trees.

2.2.9 Landscaping

A Landscape Management Plan ('LMP') has been prepared by Gannon & Associates Landscape Architecture and should be read in conjunction with this EIA Screening. The LMP includes:

- Proposed Trees, Multi Stem Trees and Ornamental Shrubs;
- Native Boundary Woodland Mix;
- Ornamental Planting Mix,
- Rain Garden Mix,
- Amenity grassland areas;
- Native ecological habitat seed mix; and,
- Nature Play area; and,
- Seating & Relaxing Area.

Any trees shown on planning drawings to be retained will be protected for the duration of the construction activities on site and in accordance with BS 5837. Protective measures will include a protective fence erected beyond the branch spread of the trees, and no construction activities will take place within the protective barrier, except for perimeter fencing along the site boundaries.

2.3 Construction Procedures

During the Construction Phase of the Proposed Development, all works will comply with relevant legislation, construction industry guidelines and best practices to minimise potential adverse environmental effects. The Proposed Development has five Construction Phases. The Proposed Development will take ca. 36 months to complete.

The following standard guidance will be followed during the Construction Phase of the project to prevent environmental pollution that may occur within the area:

- C532 – Control of Water Pollution from Construction Sites. Guidance for Consultants and Contractors (Construction Industry Research and Information Association) [3];
- C811 - Environmental Good Practice on Site (5th edition [6]);
- Guide to application of the Machinery Directive 2006/42/EC (Edition 2.2 – October 2019) [7];
- Institute of Environmental Management & Assessment ('IEMA') Guide: A New Perspective on Land and Soil in Environmental Impact Assessment [8];
- Best Practise Guidelines for the preparation of resource & waste management plans for construction & demolition projects [9]; and,
- EU Construction & Demolition Waste Management Protocol [10].

The construction compound for the development will be located within the green space area of the Site. The compound will include a site office and welfare facilities (canteen, WCs, first aid offices) for construction workers. Temporary services, including foul and storm drainage, potable water supply and an electricity supply, will be provided within this compound.

In line with the permissible hours of operation of a building site within KCC, construction works will be limited to:

- Monday – Friday: 08:00 hours – 18:00 hours;
- Saturday: 08:00 hours – 14:00 hours; and,
- Sundays and Public Holidays: Closed.

Working hours will generally be agreed in advance with the Planning Authority. Should construction work be required outside of these hours, they shall be subject to agreement with the KCC.

2.3.1 Construction Methodologies

Standard construction methodologies will be employed, given the receiving environment (within the Site) and the nature and scale of the construction associated with the Proposed Development.

All potential environmental effects will be short-term and localised. The effects being classified as short-term are due to the duration of the Construction Phase as defined in the Environmental Protection Agency ('EPA') Environmental Impact Assessment Report ('EIA') Guidelines [11]. The effects have been classified as localised as works will be limited to within the Site boundary (refer to Figure 2-1 above, red line), which is 2.23ha.

2.3.2 Excavation Works

Bulk excavation activities will consist of the removal of the made ground, topsoil and the excavation of drainage, services and building foundations, underneath the footprint of the proposed structures. A total of ca. 7000m³ of bulk excavation will be required to remove topsoil, with an average depth of 350mm.

All vegetation, predominantly grass, which has a shallow root system, will be stripped from the Site and carted away. The remaining topsoil will be stockpiled for reinstatement where required (for gardens, amenity areas, etc.). Ca. 1500m³ – 2000m³ of topsoil will be removed from the Site for re-use elsewhere.

Excavated made ground, soil / stone will be carefully stored in segregated piles on the Site for subsequent reuse within the development, where it is deemed acceptable by the site engineer

to do so. Excess material will be removed from the Site to a suitably permitted C&D recovery / disposal site, or an Article 27 by-product notification will be submitted to the EPA for approval.

2.3.3 Building Construction

The Proposed Development buildings will mainly consist of the following:

- Traditional Blockwork;
- Concrete Integrated Form ('IFC'); and,
- Pre-fabricated timber trusses.

2.3.4 Waste Management

The contractor will implement effective waste management and prevention, minimisation, reuse, recycling, recovery, and disposal of waste generated during the Construction Phase in accordance with the Construction Environmental Management Plan ('CEMP') prepared by Teicniuil-Priory Consulting Engineers Ltd. Given that the Proposed Development is a large-scale residential development, waste that is generated on-site will be mostly waste blockwork material and pre-fabricated metal structures, typical of such a development.

Wastes generated on-site will be managed by the Developer, in order of priority, in accordance with section 21A of the Waste Management Act 1996 [12].

Waste will be prevented by the reuse of materials, or where this is not practicable, waste will be collected and segregated on-site before being removed off-site to a suitably permitted C&D recovery/disposal site in accordance with relevant waste legislation such as the Waste Framework Directive (2008/98/EC) [13] or an Article 27 by-product notification will be submitted to the EPA.

Due to the scale of construction and its location, using standard demolition and construction measures outlined above, Construction Phase environmental effects will be not likely and not significant.

2.4 Operational Phase

During the Operational Phase, the Proposed Development will require moderate amounts of resources, such as water, electricity and gas, typical of a residential development. The Proposed Development will also generate waste generally associated with residential development, which will require removal by a contractor on a regular basis. Emissions arising from the Proposed Development will include traffic, light and noise, which are typical of a residential development and are in line with the land use within the vicinity of the Site.

Due to the scale and nature of the Proposed Development, environmental effects will be long-term and not significant.

3 METHODOLOGY

3.1 Desk-Based Studies

In undertaking this EIA Screening Assessment, a detailed desk-based study was completed, which included a review of the following information:

- Relevant legislation and guidance;
- Relevant published information pertaining to the Site and study area in regard to all of the stipulated EIA topics; and,
- Information supplied by Teicniuil-Priory Consulting Engineers Ltd, with regard to their proposed operations.

3.2 Regulatory Context

The following section outlines legislative documents and guidelines used in the EIA Screening assessment.

3.2.1 EIA Screening Legislative and Regulatory Context

To determine whether it is required to undertake an EIA for the Proposed Development, the relevant legislation, policy and guidance have been taken into account, and the EIA screening report has been prepared in accordance with:

- The Planning and Development Regulations, 2001 (as amended) [14];
- Directive 2014/52/EU amendment Directive – 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (2014 EIA Directive) [15];
- OPR Practice Note PN02 Environmental Impact Assessment Screening, 2021 [16];
- European Commission (2017), Environmental Impact Assessment of Projects, Guidance on Screening [11];
- European Commission (2024) Interpretation of Definitions of Project Categories of Annex I and II of the EIA Directive [17];
- Department of the Environment, Heritage, and Local Government (August 2003), Environmental Impact Assessment ('EIA') Guidance for Consent Authorities regarding Sub-threshold Development [18];
- Environmental Protection Agency ('EPA') Guidelines on the Information to be contained in Environmental Impact Assessment Reports (May 2022) [19]; and,
- Department of Housing, Planning and Local Government ('DHPLG') - Guidelines for Planning Authorities and An Bord Pleanála on Carrying out Environmental Impact Assessment (August 2018) [20].

3.3 Field-Based Studies

A Site walkover was undertaken on 24th July 2024 by a suitably qualified and experienced MOR Environmental consultant to assess the Site and its surroundings.

4 RECEIVING ENVIRONMENT

This section describes the existing conditions at the Site.

The Site is a greenfield site comprised entirely of agricultural grassland. The Site is bordered to the west by existing residential properties, followed by the Iarnród Eireann Railway (South Kerry Line: Mallow-Cobh) and further residential properties. The Site is bordered to the east by agricultural grassland, followed by the Deerpark Shopping Centre and residential properties. The Site is bordered to the south by existing residential properties.

The Deerpark Pitch & Putt Club is located to the north of the Site, followed by Dr. Crokes GAA Club, further residential properties and the National Road N22. The surrounding area is a mix of private residential properties, commercial properties and sports venues such as Fitzgerald Stadium and the local GAA club.

4.1 Watercourses within the Vicinity of the Site

The Site is situated within the Laune-Maine-Dingle Bay WFD Catchment [Catchment_ID: 22] and the Laune_SC_010 subcatchment [Subcatchment_ID: 22_14] [21].

As per EPA Maps, there are no hydrological features of note within 1km of the Site. There are two hydrological features within 1.5km of the Site, which are presented below.

1. Deenagh_020

The Deenagh_020 is located ca. 1km west of the Site, at its closest point. The river flows in a southwesterly direction and drains into Lough Leane, ca. 2.4km downstream of the Site. Lough Leane forms part of the Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC and the Killarney National Park SPA.

Under the Water Framework Directive ('WFD') 2000/60/EC, as amended, the EPA classifies the status and the risk of not achieving good water quality status for all waterbodies in Ireland [21]. According to the WFD 2016-2021 monitoring events, the most up-to-date data at the time of writing this report, the water quality within the Deenagh_020 is considered to be 'good,' and the status of this river is considered 'at risk' [21].

2. Flesk (Kerry)_060

The Flesk (Kerry)_060 is located ca. 1.5km southeast of the Site, at its closest point. The river flows in a south westerly direction and drains into Lough Leane, ca. 3.5km downstream of the Site. Both the Flesk (Kerry)_060 and Lough Leane form part of the Killarney National Park. Macgillycuddy's Reeks and Caragh River Catchment SAC and Lough Leane form part of the Killarney National Park SPA.

Under the WFD 2000/60/EC, as amended, the EPA classifies the status and the risk of not achieving good water quality status for all waterbodies in Ireland [21]. According to the WFD 2016-2021 monitoring events, the most up-to-date data at the time of writing this report, the water quality within the Flesk (Kerry)_060 is considered to be 'good,' and the status of this river is considered 'not at risk' [21].

The location of the key surface water features in the vicinity of the Site is illustrated in Figure 4-1 below.

Figure 4-1: Watercourses in the Vicinity of the Site



4.1.1 Drainage Ditches

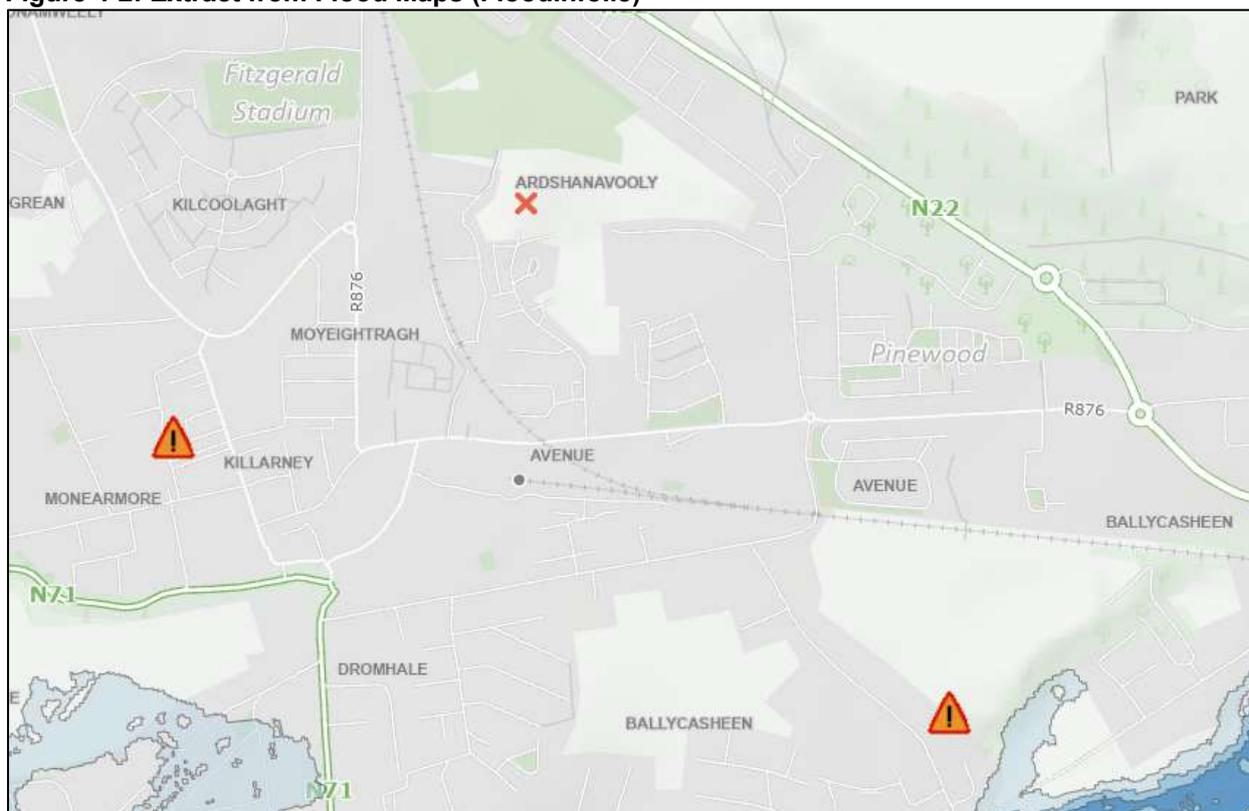
As per OPW Flood Maps, there are no Drainage Districts, Arterial Drainage Schemes and Benefited Areas located within the vicinity of the Site. No drainage ditches were identified during the Site walkover.

4.1.2 Flood Risk

The Office of Public Works flood risk maps available at Floodinfo.ie were reviewed on 02/09/2025 and confirm that there are no flood risks associated with the Site; refer to Figure 4-2 below [22]. There is no apparent risk of flooding at or in the immediate vicinity of the Site.

There is one flood event associated with the River Flesk, ca. 1.3km southeast of the Site in 2015, and one notable flood event at ca. 520m west of the Site in 2019.

Figure 4-2: Extract from Flood Maps (Floodinfo.ie)

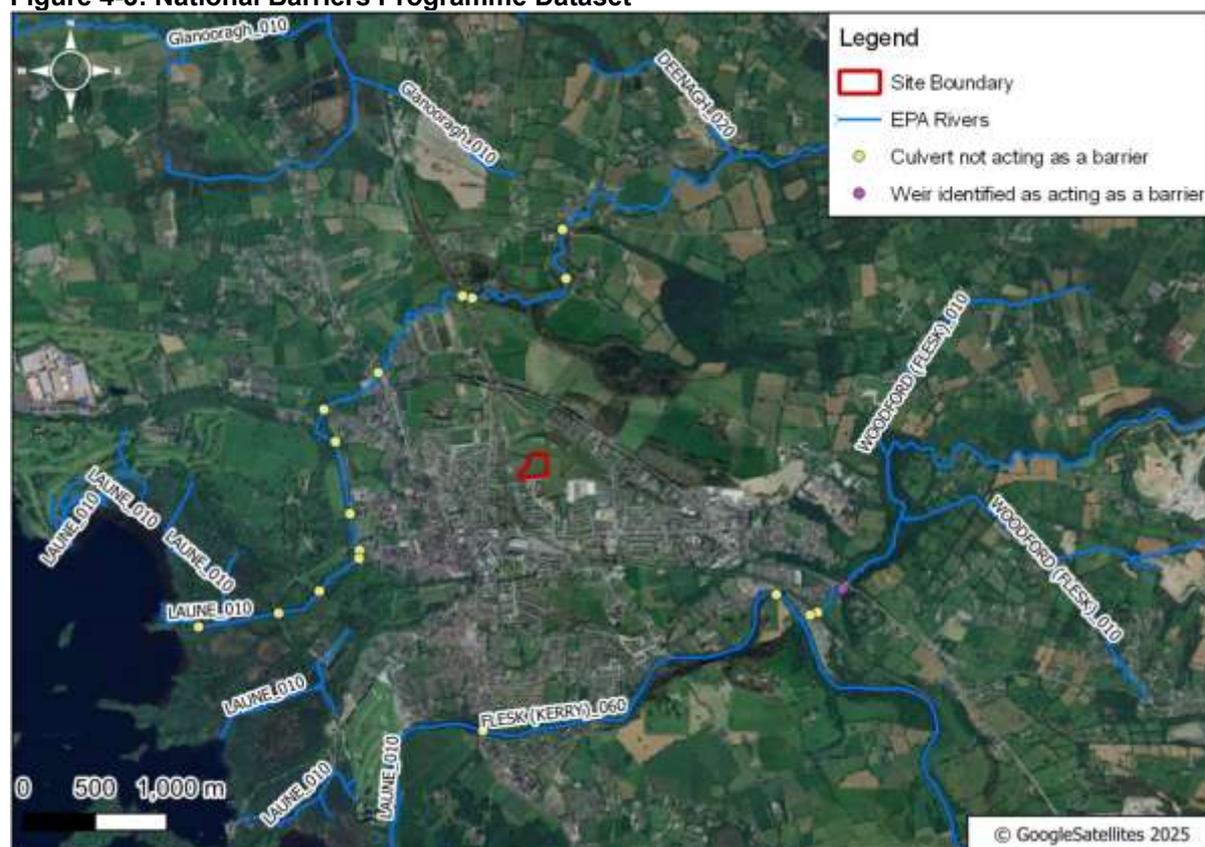


4.1.3 National Barrier Programme

Irish rivers are heavily fragmented by weirs, dams, sluices, culverts, bridges and other artificial barriers. Therefore, the National Barriers Programme ('NBP') database was created as a national database of potential barriers to fish passage and includes assessing structures which can impact on both fish passage and hydromorphology [23].

As per the NBP Dataset, 13 barriers were identified along the Deenagh_020 watercourse. All of these barriers were identified as culverts and do not act as barriers. Five barriers were identified along the Flesk (Kerry)_060 watercourse. Four of these barriers were identified as culverts, and do not act as barriers. However, one weir located downstream of the Site was identified as a barrier and further assessment is required by Inland Fisheries Ireland ('IFI').

Figure 4-3: National Barriers Programme Dataset



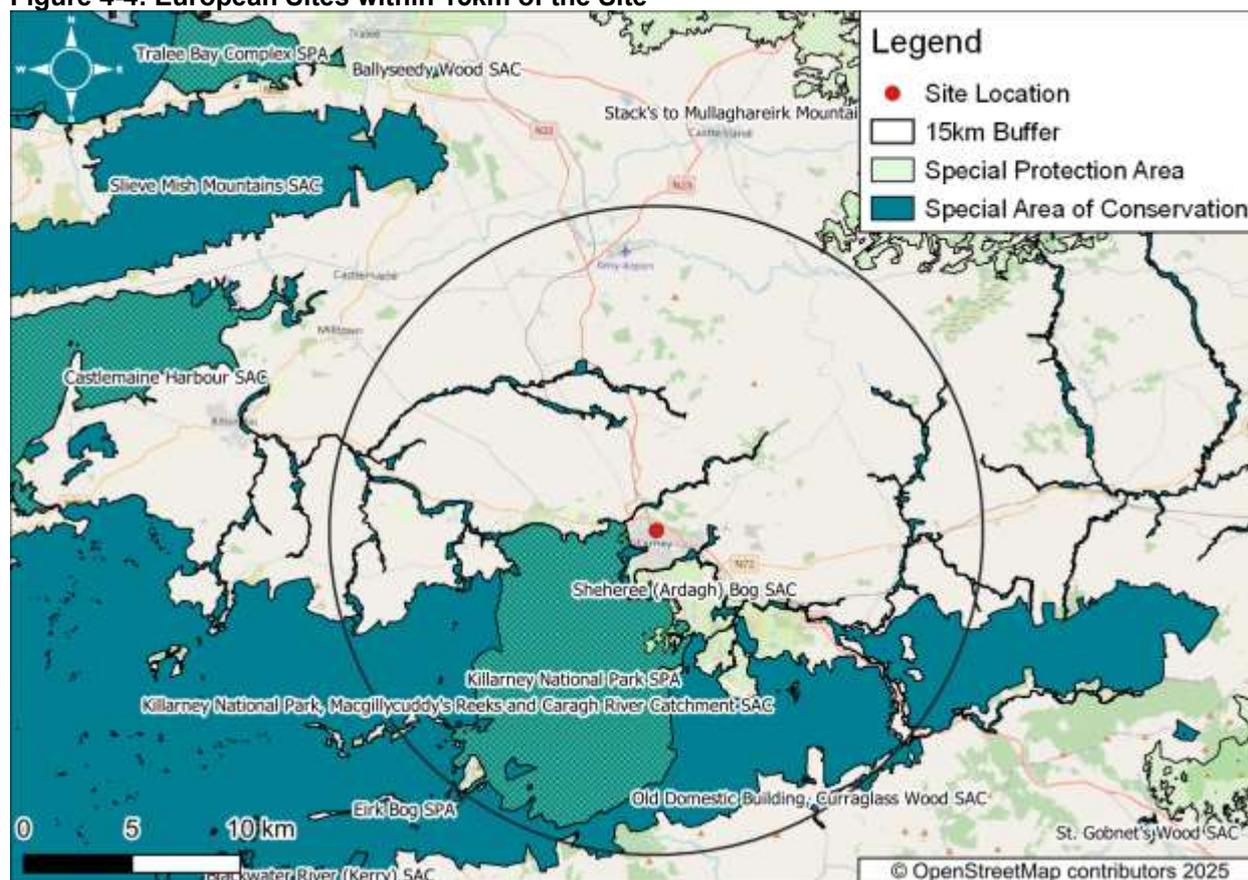
4.2 Biodiversity

The Site is not located within or directly adjacent to any European sites. There are five European sites located within 15km of the Site – these are identified in Figure 4-4 and Table 4-1 below. There is also one National Heritage Area ('NHA') and four proposed National Heritage Area ('pNHA').

Table 4-1: European Designated Sites within 15km of the Site

Site Name	Code	Distance (km)	Direction from the Site
Special Areas of Conservation ('SAC')			
Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC	000365	0.75km	W/SW
Sheheree (Ardagh) Bog SAC	000382	2.7km	SE
Castlemaine Harbour SAC	000343	5.0km	NW/W
Old Domestic Building, Curraglass Wood SAC	002041	14.24km	SE
Special Protection Area ('SPA')			
Killarney National Park SPA	004038	0.75km	W/SW

Figure 4-4: European Sites within 15km of the Site



Given the short duration of the construction works, lack of impact pathways and the distance separating the Site from the Killarney National Park, Macgillicuddy's Reeks and Caragh River Catchment SAC and the Sheherree (Ardagh) Bog SAC, it is considered that the Proposed Development will not result in adverse effects to these European sites. They have therefore been screened out from further consideration.

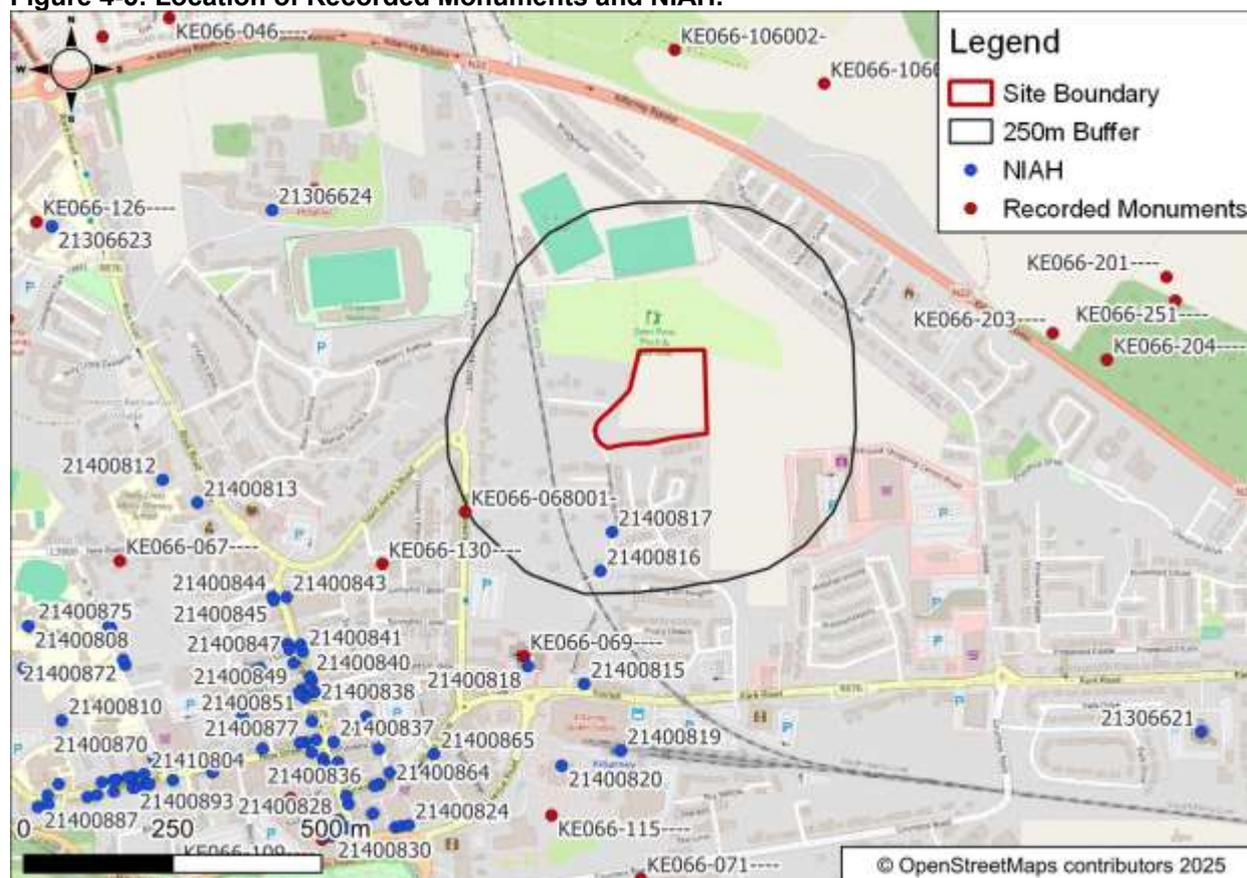
Refer to the AA Screening Report submitted as a standalone document as part of this planning application for more information.

4.3 Cultural Heritage

A review of the recorded monuments and the National Inventory of Archaeological Heritage ('NIAH') sites was carried out to assess the potential impact of the Proposed Development on-site and within the vicinity of the Site on cultural heritage.

There are no recorded monuments and two NIAH sites within 250m of the Site. The closest recorded monument to the Site, a burial ground (KE066-068001-), is ca. 260m southwest of the Site. The closest NIAH site is ca. 140m south of the Site, which is a 19th-century house (Registration No. 21400817). The majority of the NIAHs found within 2km of the Site are found along the New Street and High Street to the ca. 600m southwest.

Figure 4-5: Location of Recorded Monuments and NIAH.



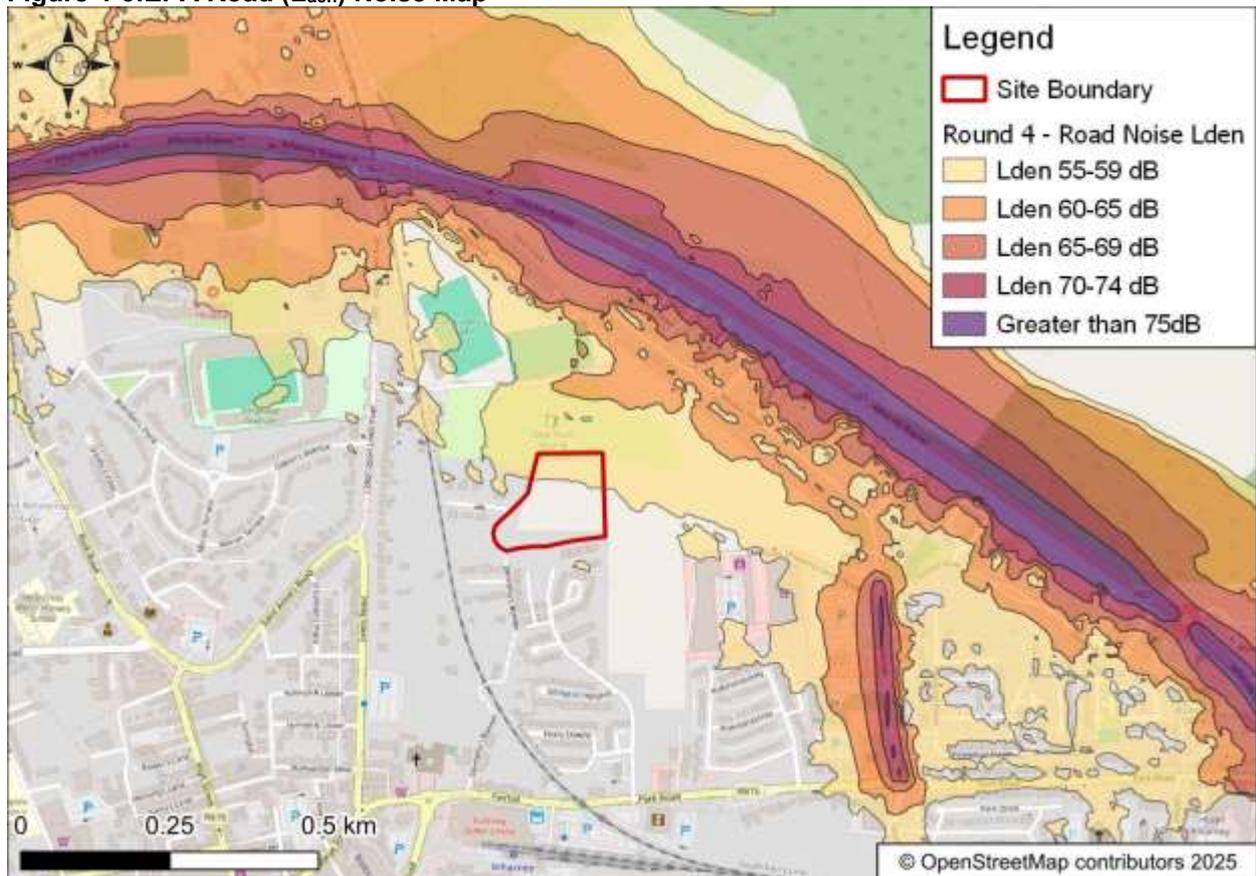
The Proposed Development does not contain any recorded monuments or protected structures on-site. The Proposed Development does not seriously detract from the setting of the features and is sited and designed appropriately. Therefore, it is considered that the Proposed Development will have no impact on the Cultural Heritage in the area.

4.4 Acoustics

Online strategic road traffic noise maps were reviewed to assess the baseline noise environment. Figures 4-6 and 4-7 below show these strategic road traffic noise maps during the evening and night-time (L_{den}) and the night-time, respectively (L_{night}). Airport noise impacts on the locality were discounted as there is no airport within a 2km radius of the Proposed Development. Rail was discounted as Strategic Noise Maps do not include Killarney Station or rail lines in the vicinity of the Site [24].

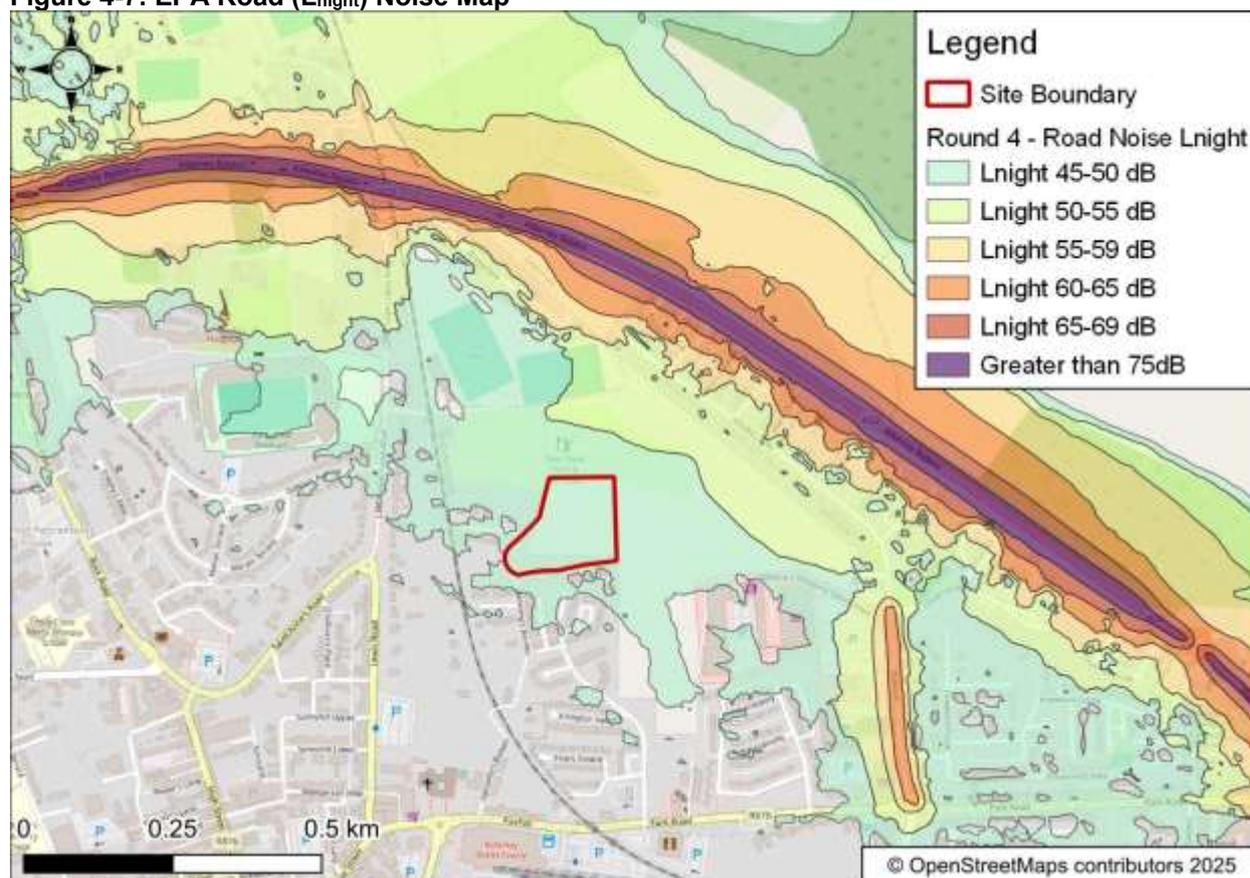
The northern section of the Site is located in L_{den} contour band of 55-59dB; refer to Figure 4-6 below. The ambient acoustic environment is considered to be Low to Medium risk as per the Professional Practice Guidance on Planning and Noise ('ProPG') [25].

Figure 4-6: EPA Road (L_{den}) Noise Map



The Site is located in L_{night} contour bands of 45-50dB, refer to Figure 4-7 below. The ambient acoustic environment is considered to be Low to Medium risk as per the ProPG [25].

Figure 4-7: EPA Road (L_{night}) Noise Map



Based on the above, it is predicted that ambient levels associated with the Proposed Development will be within the relevant standards and guidelines set out in the ProPG [25].

4.5 Population and Human Health

The Proposed Development is located within the Killarney Urban Electoral District. According to the CSO census data, the Killarney Urban ED population decreased from 10,826 to 10,487 between 2016-2022.

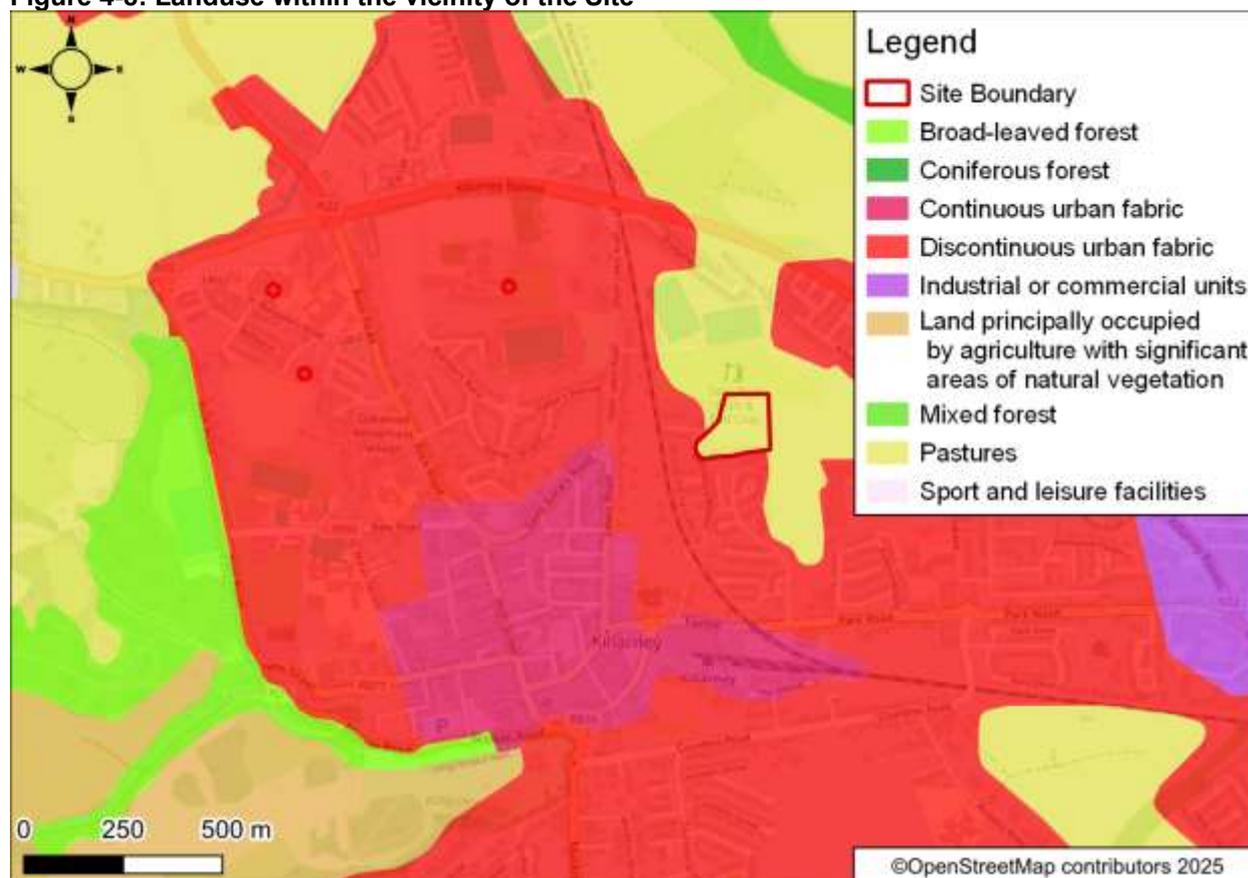
During construction, there is the potential for temporary minor impacts related to traffic inconvenience, dust and noise to occur. However, the works will be short-term in duration. Standard best practice construction methodologies will limit disturbance to people in the area. The potential impacts of the Construction Phase on human beings are not considered to be significant.

The Proposed Development, when operational, will provide additional housing stock in an area of high demand, which is considered a significant positive impact.

4.6 Soil

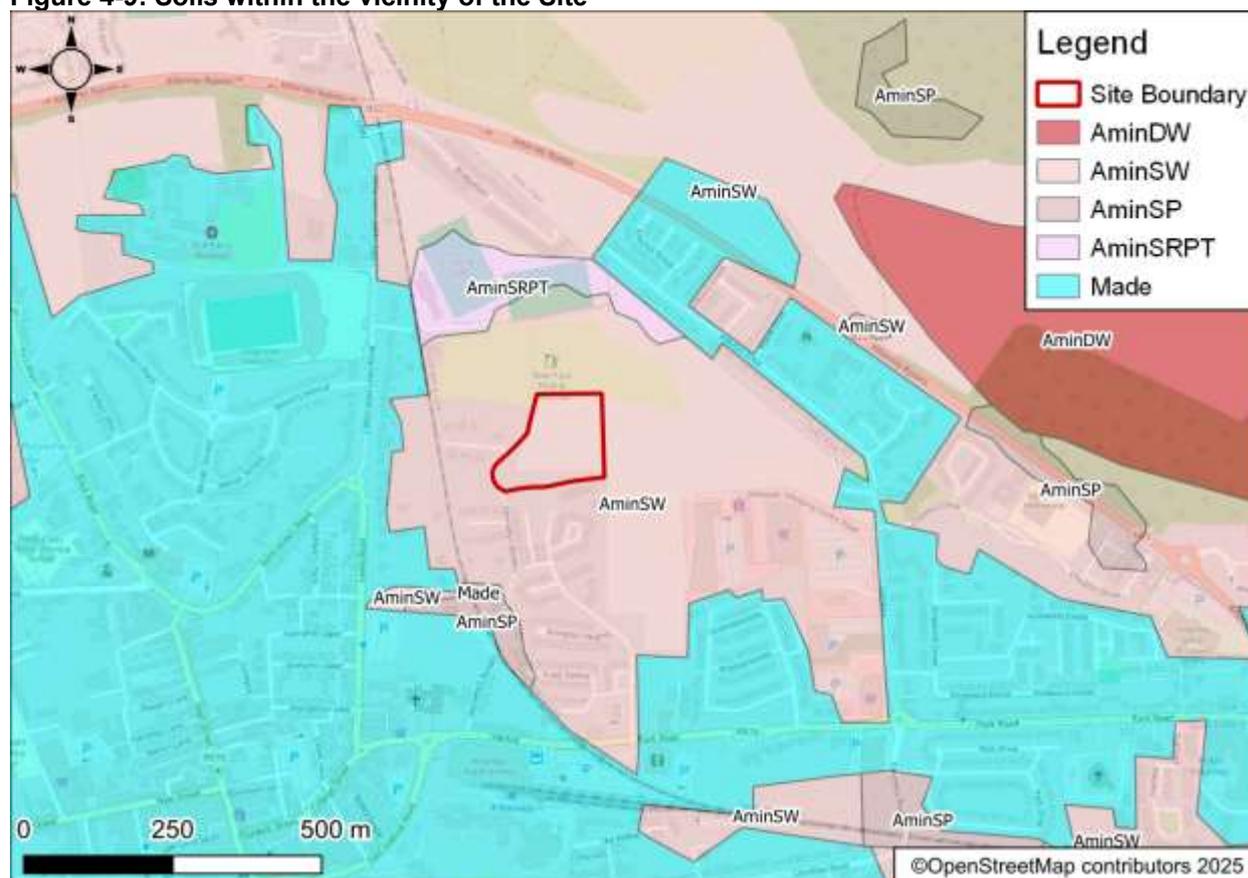
A review of the online GSI maps was carried out on 26th August 2025. According to the GSI database, the land use at the Site is 'Pasture'; refer to Figure 4-8 below. Within the immediate vicinity of the Site, 'Discontinuous urban fabric' is the primary land use.

Figure 4-8: Landuse within the vicinity of the Site



According to the GSI mapping database, the soil at the Site is designated 'AminSW', which can be described as a mineral soil that has a shallow depth and is well-drained. Within the immediate vicinity of the Site, AminSW is the primary soil type. To the west and south, 'Made' ground represents areas of Killarney town. See Figure 4-9 below.

Figure 4-9: Soils within the vicinity of the Site



The Proposed Development will see a change in land use from 'Pasture' to 'Discontinuous Urban Fabric'. This change in land use is in line with the CDP, as the Site has been designated as 'New/proposed Residential Phase 1'. During the Construction and Operational Phase, there is potential for pollutants to arise; however, standard industry controls and mitigation measures, such as the SuDS outlined in section 2.2.3, common to such projects, will be sufficient to avoid likely and significant effects on the environment. Therefore, it is considered that there will be no impact on soil in the area as a result of the Proposed Development.

5 EIA SCREENING

In determining the requirement for EIA, the EIA Directive differentiates between the projects that automatically require a mandatory EIA and those for which an EIA may be required if they are likely to have significant effects on the environment. These projects are listed in Annex I and Annex II of the EIA Directive, respectively.

5.1 Stage 1 - Mandatory EIA Screening

The Proposed Development is not a type of project identified in Part 1 of Schedule 5 of the Planning and Development Regulations 2001 (as amended), and therefore, a mandatory EIA is not required.

The activities within Part 2 of Schedule 5 of the Planning and Development Regulations, 2001 (as amended), which relate to the Proposed Development, are presented in Table 5-1.

Table 5-1: Screening for Part 2 of Schedule 5

Class		Applicability	Screening
2 (10) (b) (i)	Construction of more than 500 dwelling units.	The Proposed Development involves the construction of 124 No. residential units. The Proposed Development accounts for ca. 25% of the threshold; therefore, a mandatory EIA, as classified under Annex I, was not required.	Proposed Development is in this class, but below threshold. EIA Screening is not Required
2 (10) (b) (ii)	Construction of a carpark providing more than 400 spaces, other than a carpark provided as part of, and incidental to the primary purpose of, a development.	The Proposed Development includes a total of 143 No. parking spaces. The car parking is incidental to the Proposed Development. This does not meet the threshold for an EIA and, therefore, a mandatory EIA, as classified under Annex I, was not required.	Primary purpose not car-parking. EIA Screening not Required
2 (10) (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 footprint of the Proposed Development will cover a Site area of ca. 2.23ha, which is below the threshold of 10ha in the case of other built-up areas. Further consideration of the impacts within an EIA was not considered necessary in this regard.	Proposed Development is classified under item 2(10)(b)(i) above – not an urban development. EIA Screening not Required
2 (10) (dd)	All private roads which would exceed 2000 metres in length.	Vehicular access to the Proposed Development will be via the existing road system currently serving the small residential estates of Friary Downs and Sail Ardán to the south of the Site. This will lead to the main Park Road R876. This road is less than 2000 metres and will be accessible to the public once constructed, and therefore does not exceed the threshold.	Road infrastructure will not be private. Proposed Development is not in this class. EIA Screening not Required

The Proposed Development does not meet any of the thresholds outlined in Part 2 of Schedule 5, and its characteristics do not meet the class requirements for consideration. Therefore, an EIA screening is not required with respect to the thresholds under Part 2 of Schedule 5.

6 CONCLUSIONS

This desk-based EIA Screening Assessment has assessed the potential for the Proposed Development to have significant effects on the environment.

Based on the findings of this EIA Screening Report and relevant shared documents from the Client, the Proposed Development does not require a mandatory / automatic EIA under Schedule 5 Part 1 or Part 2 of the Planning and Development Regulations, 2001 (as amended).

The Proposed Development does align with Schedule 5, Part 2, item 10 (b) (i), namely Construction of more than 500 dwelling units. However, the Proposed Development with 124 residential dwellings is significantly below the threshold.

A review of the plan and particulars of the Proposed Development does not indicate that the environmental effects from the construction and operation will result in effects above and beyond those expected from a standard residential development.

A review of the receiving environment does not identify an environment likely to be more susceptible to effect from a development of this type than a 'standard greenfield urban area' as envisaged during the setting of the EIA threshold levels.

There is no real likelihood of significant effects on the environment, having considered the nature, size and location of the Proposed Development during the Construction or Operational Phases and as such does not require a sub-threshold EIA to be carried out in respect of it.

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