



## **Chapter 1** Introduction

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# 1. INTRODUCTION

## 1.1 Introduction

This Environmental Impact Assessment Report (EIAR) is prepared for the proposed West Clare Railway Greenway Section 1 Kilrush to Kilkee project, hereafter referred to as the 'proposed development'. The EIAR has been prepared having regard to the requirements of Annex IV of Directive 2011/92/EU (as amended by Directive 2014/52/EU), and comprises "A statement of the effects, if any, which [the] proposed development, if carried out, would have on the environment" (Guidelines on the Information to be contained in Environmental Impact Assessment Reports (EPA, 2022)).

This EIAR has been prepared by Roughan & O'Donovan Consulting Engineers (ROD) and a team of specialist sub-consultants on behalf of the applicant Clare County Council (CCC). This EIAR forms part of the application that will be submitted by CCC, the "Applicant" to An Coimisiún Pleanála under the Roads Act 1993, as amended, for its determination of the proposed development.

This EIAR for the proposed development is presented in four volumes. The Volumes are presented below:

**Volume 1: Non – Technical Summary**

**Volume 2: Main Text**

Chapter	1:	Introduction
Chapter	2:	Policy Context and Need for the Proposed Development
Chapter	3:	Assessment of Alternatives
Chapter	4:	Description of the Proposed Development
Chapter	5:	Traffic and Transportation
Chapter	6:	Population
Chapter	7:	Human Health
Chapter	8:	Biodiversity
Chapter	9:	Land and Soils
Chapter	10:	Hydrology
Chapter	11:	Hydrogeology
Chapter	12:	Air Quality
Chapter	13:	Climate
Chapter	14:	Noise and Vibration
Chapter	15:	Landscape and Visual
Chapter	16:	Cultural Heritage
Chapter	17:	Material Assets and Land (Agricultural)
Chapter	18:	Material Assets and Land (Non-Agricultural)
Chapter	19:	Major Accidents and Disasters
Chapter	20:	Interactions and Cumulative Effects
Chapter	21:	Summary of Mitigation and Monitoring Measures

**Volume 3: Figures**

**Volume 4: Appendices**

### **1.1.1 Natura Impact Statement**

A Natura Impact Statement (NIS) has been prepared and is provided as a separate document accompanying the application. The NIS contains a comprehensive examination, analysis and evaluation, including recommendations, in respect of the implications of the proposed development, individually and in combination with other plans and projects, for the integrity of the European sites concerned. The NIS has been prepared having regard to the provisions of Part XAB of the Planning and Development Act, 2000 (as amended) to inform the carrying out of an Appropriate Assessment by An Coimisiún Pleanála for the purposes of Article 6[3] of the Habitats Directive.

### **1.2 General Overview of the Proposed Development**

The proposed development comprises an approximately 15.2km walking and cycling greenway along the general route of the former West Clare Railway between Kilrush and Kilkee in County Clare, via the village of Moyasta. The proposed development seeks to provide an alternative means of transport for local trips in the area, reducing the dependence on carbon intensive transport modes, as well as providing a significant amenity facility and tourist attraction. The proposed greenway will enable inter-modal travel for those located along the route, through the provision of a safe walking and/or cycling journey to a key settlement area where public transport can be availed of for a wider, longer distance journey.

The premise of the proposed development is to, where possible, avail of the former West Clare Railway alignment between Kilrush and Kilkee. The proposed development will create a continuous route between key settlements, providing a safe transport corridor for vulnerable road users which will be predominantly segregated from motorised traffic. It will also provide views across the wider landscape and information for users on both the natural and built heritage of the region along the way.

The proposed development consists of the following key elements:

- The proposed greenway, described from west to east, commences in Kilkee and generally follows the route of the former West Clare Railway line through Moyasta, concluding in Kilrush. The development will mainly comprise of a 3m wide asphalt surface with 1m verges and boundary treatments. Where the development intersects public roads, crossings will be provided. The overall width may narrow slightly in some sections due to local constraints such as the use of existing railway bridges or embankments.
- New structures are proposed to facilitate the crossing of watercourses and roads. These structures include overpasses, bridges, and retaining walls.
- Pipes, culverts and headwalls throughout the length of the development will be provided as required by detailed design, following TII Publications Standards.
- Stockproof fencing (CC-SCD-00320) or other suitable alternative, with native hedgerows alongside the fencing is proposed for sections of the development bordering or running through private farmland. Existing fencing and hedging will be retained, where possible. Where the route follows the rail corridor, mature vegetation will be preserved, where possible.
- Screening, generally comprising vegetation, will be provided through ecologically sensitive areas, as required.
- Construction compounds are to be located at the proposed trailhead locations in Moyasta and Kilrush.

A detailed description of the proposed development is provided in Chapter 4 of this EIAR, Description of the Proposed Development. The location and route of the proposed development is shown in Plate 1-1 below, and Figure 1.1 in Volume 3 of the EIAR.

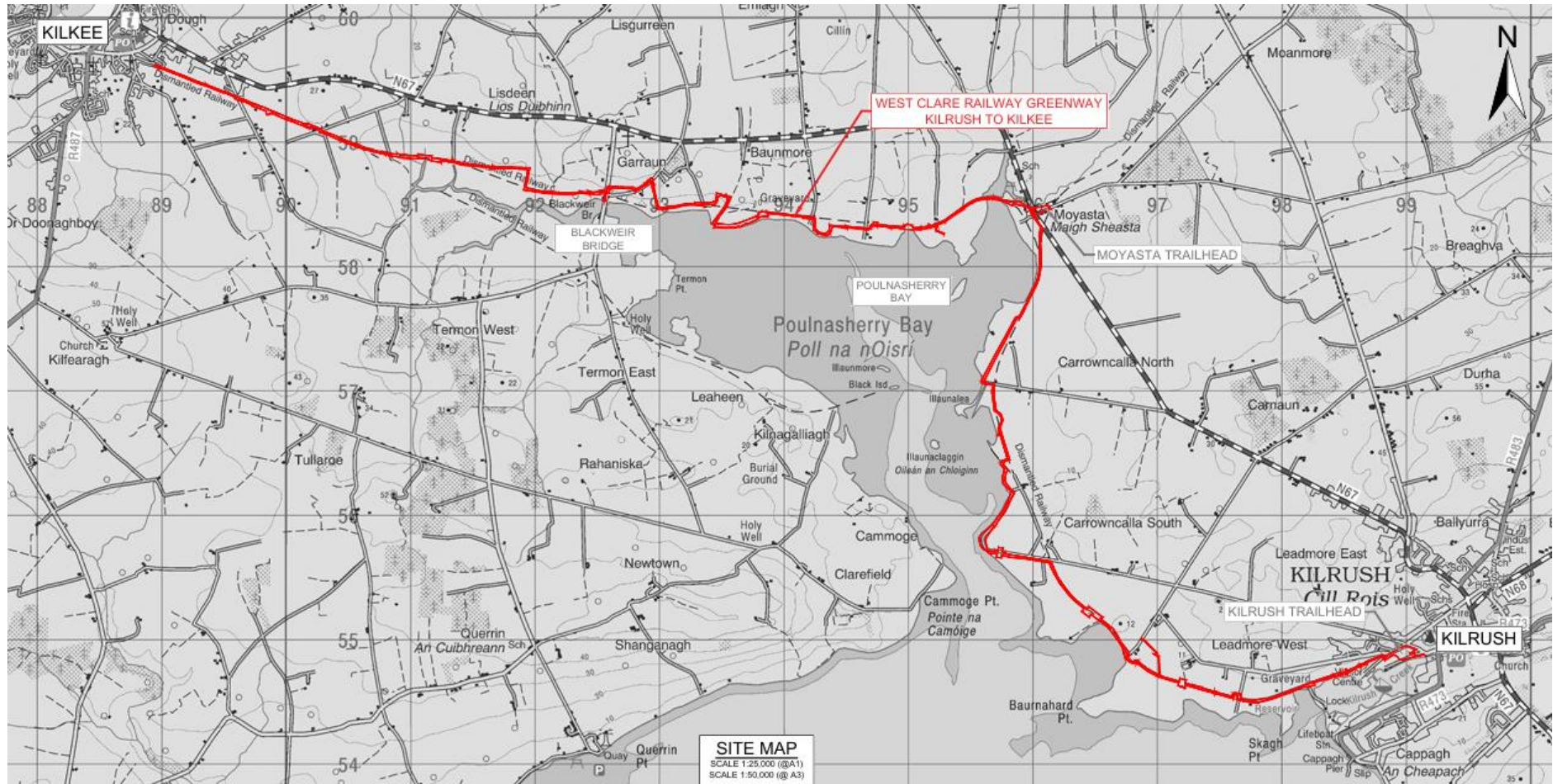


Plate 1-1 Route of the Proposed Development

## 1.3 EIA Legislation

### 1.3.1 Introduction

Environmental Impact Assessment (EIA) is defined in Directive 2011/92/EU (and as amended by Directive 2014/52/EU) as follows:

*“Environmental Impact Assessment” means a process consisting of:*

- (i) the preparation of an environmental impact assessment report by the developer, as referred to in Article 5(1) and (2);*
- (ii) the carrying out of consultations as referred to in Article 6 and, where relevant, Article 7;*
- (iii) the examination by the competent authority of the information presented in the environmental impact assessment report and any supplementary information provided, where necessary, by the developer in accordance with Article 5(3), and any relevant information received through the consultations under Articles 6 and 7;*
- (iv) the reasoned conclusion by the competent authority on the significant effects of the project on the environment, taking into account the results of the examination referred to in point (iii) and, where appropriate, its own supplementary examination; and*
- (v) the integration of the competent authority's reasoned conclusion into any of the decisions referred to in Article 8a.”*

An Coimisiún Pleanála is the competent authority for the purpose of carrying out an environmental impact assessment of the proposed development.

### 1.3.2 Legislative Context

Directive 2011/92/EU as amended by Directive 2014/52/EU (the EIA Directive) sets out the requirements for environmental impact assessment (“EIA”), including screening for EIA for Member States.

Projects listed in Annex I of the EIA Directive require mandatory EIA while projects listed in Annex II require Screening to determine whether an EIA is required or not. Annex I and Annex II of the EIA Directive have been transposed into Irish Law in the Planning and Development Regulations, 2001 (as amended) and in particular Schedule 5 (Part 1 and Part 2).

Section 50 (1)(a) of the Roads Act 1993, as amended, sets out the requirements and provisions for the preparation of an EIAR.

All roads projects can be placed into one of the following two categories:

- Those that exceed the thresholds laid down and therefore have a mandatory requirement to prepare an EIAR; and
- Those projects that are sub-threshold and must be assessed on a case-by-case basis to determine whether or not they are likely to have significant effects on the environment.

### Requirement for Environmental Impact Assessment

According to the ‘Strategy for the Future Development of National and Regional Greenways’ published by the Department of Transport, Tourism and Sport (DoTTS) in 2018, a ‘greenway’ is defined as “...a recreational or pedestrian corridor reserved exclusively for non-motorised journeys...”.

Section 68(1) of the Roads Act, 1993 (as amended) defines 'cycleway' as:

*"... 'cycleway' means a public road or proposed public road reserved for the exclusive use of pedal cyclists or pedal cyclists and pedestrians".*

Furthermore, Section (10)(1)(c) of the Roads Act, 1993 (as amended) states that:

*"A public road, other than a national road or a regional road, shall be a local road."*

In respect of the above definition under Section 68 of the Roads Act 1993 (as amended), the proposed development is considered to be a public road. Therefore, this EIAR will be assessed under Section 50 of the Roads Act 1993 (as amended).

The guidance document *Environmental Planning of National Road and Greenway Projects RE-ENV-07008* (TII, 2023) and *Environmental Impact Assessment of Rural Cycleways (Offline & Greenway) – A Practical Guide PE-ENV-01109* (TII, 2024) is referred to in order to determine the appropriate consent procedure.

An EIA Screening Report was prepared to identify likely significant effects that may occur on the environment as a result of the proposed development. The EIA Screening Report has determined that the proposed development does not exceed the thresholds that trigger the mandatory requirement for EIA and subsequently the proposed development is deemed to be a sub-threshold development. This sub-threshold development has been assessed in accordance with Schedule 7A of the Planning and Development Regulations, 2001 (as amended).

The assessment was undertaken with regard in particular to:

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; and
3. A description of any likely significant effects on the environment.

The EIA Screening found that due to the nature and extent of the proposed development, likely significant effects as a result of the construction and operation of the proposed development cannot be ruled out across the environmental factors assessed.

A separate Appropriate Assessment (AA) Screening Report has been completed and has informed this EIA Screening. The AA Screening Report found that, on the basis of objective information, that the proposed development, either individually or in combination with other plans or projects, has the potential to give rise to impacts which would constitute significant effects on four European sites, the Lower Shannon SAC, the River Shannon and River Fergus Estuaries SPA, the Illaunonearaun SPA and the Mid-Clare Coast SPA in view of their Conservation Objectives.

The EIA Screening concluded that the proposed development would be likely to have significant effects on the environment by virtue of its characteristics, location, size or potential impacts and requires an EIAR to be undertaken.

## **1.4 EIAR Methodology**

Article 3(1) of the 2011 EIA Directive (as amended) states that *"an environmental impact assessment shall identify, describe and assess in an appropriate manner, in the light of each individual case, and in accordance with Articles 4 to 12, the direct and indirect effects of a project"* on the following factors:

- (a) human beings, fauna and flora;
- (b) soil, water, air, climate and the landscape;
- (c) material assets and the cultural heritage;
- (d) the interaction between the factors referred to in (a), (b) and (c).

This EIAR has been prepared using the “grouped” format structure as detailed in the 2022 EPA Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, “*where the discussion of the characteristics of the environment in the EIAR are grouped under the headings which correspond to these factors or closely related headings*”. Considering this, a description of the receiving environment, the potential impacts on the environment because of the proposed development, mitigation measures and residual impacts are grouped in each chapter of the EIAR. The group format makes it easy to review topics of interest and cross-reference between specialists’ studies as appropriate. The full list of chapter headings set out in the EIAR are listed in Section 1.1 above.

#### **1.4.1 Environmental Impact Assessment Guidelines**

The preparation of the EIAR has been informed by relevant national EIA guidelines prepared by the Environmental Protection Agency (EPA), the Department of Housing, Local Government and Heritage (DHLGH) and Transport Infrastructure Ireland (TII) including:

- EPA (2022) *Guidelines on the information to be contained in Environmental Impact Assessment Reports*.
- EPA (2003) *Advice notes on current practice (in the preparation of Environmental Impact Statements)*.
- Department of Housing, Planning and Local Government (August 2018) *Guidelines for Planning Authorities and An Coimisiún Pleanála on carrying out Environmental Impact Assessment*.
- National Roads Authority (November 2008) *Environmental Impact Assessment of National Road Schemes - A Practical Guide, Revision 1*.
- EPA (2015) *Draft Advice notes for preparing Environmental Impact Statements*.

Other guidelines from TII and other bodies have been considered in the relevant technical assessment chapters of this EIAR and are referenced in those chapters.

The following guidelines have also been consulted in the preparation of this EIAR:

- European Commission (2017) *Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report, European Commission*.
- Failte Ireland (July 2023) *Environmental Impact Assessment Guidelines*.

#### **1.4.2 Transport Infrastructure Ireland / National Roads Authority Guidelines**

Transport Infrastructure Ireland (TII) was established through an amalgamation of the National Roads Authority (NRA) and the Railway Procurement Agency (RPA) under the Roads Act 2015 (as amended). Prior to the merger, the NRA published construction and planning guidelines that have been followed during the design and environmental assessment processes for the proposed development.

For the purposes of this EIAR, the NRA guidelines will be referred to as TII guidelines throughout the EIAR where appropriate.

The following planning and evaluation guidelines were considered over the course of the environmental assessment process:

- TII (December 2008) *Environmental Impact Assessment of National Road Schemes - A Practical Guide PE-ENV-01114*;
- TII (February 2023) *Environmental Planning of National Road and Greenway Projects RE-ENV-07008*;
- TII (November 2024) *Environmental Impact Assessment of Rural Cycleways (Offline & Greenway) – A Practical Guide PE-ENV-01109*;
- TII (December 2025) *Population and Human Health Assessment of Proposed National Roads – Standard PE-ENV-01108. Revision 2*;
- TII (December 2005) *Best Practice Guidelines for the Conservation of Bats in the Planning of National Road Schemes PE-ENV-01115*;
- TII (December 2009) *Guidelines for Assessment of Ecological Impacts of National Road Schemes PE-ENV-01112*;
- TII (December 2008) *Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes PE-ENV-01113*;
- TII (December 2008) *Guidelines on Procedures for Assessment and Treatment of Geology, Hydrology and Hydrogeology for National Road Scheme PE-ENV-01116*;
- TII (December 2025) *Water Impact Assessment for National Roads, Light Rail, Metro and Rural Cycleways – Overarching Technical Document PE-ENV-01202*;
- TII (December 2025) *Air Quality Assessment of Proposed National Roads - Standards PE-ENV-0110. Revision 2*;
- TII (December 2025) *Air Quality Assessment of Specified Infrastructure Projects – Overarching Technical Document PE-ENV-01106. Revision 2*;
- TII (December 2022) *Climate Guidance for National Roads, Light Rail, and Rural Cycleways (Offline & Greenways) - Overarching Technical Document PE-ENV-01104*;
- TII (December 2022) *Climate Assessment of Proposed National Roads – Standard PE-ENV-01105*;
- TII (March 2014) *Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes PE-ENV-01111*;
- TII (October 2004) *Guidelines for the Treatment of Noise and Vibration in National Road Schemes PE-ENV-01110*;
- TII (February 2006) *A Guide to Landscape Treatments for National Road Schemes in Ireland GE-ENV-01102*;
- TII (December 2020) *Landscape Character Assessment (LCA) and Landscape and Visual Impact Assessment (LVIA) of Specified Infrastructure Projects - Overarching Technical Document PE-ENV-01101*;
- TII (December 2020) *Landscape Character Assessment (LCA) and Landscape and Visual Impact Assessment (LVIA) of Proposed National Roads – Standard, PE-ENV-01102*;
- TII (September 2025) *Guidelines for Cultural Heritage Impact Assessment of TII National Road and Greenway Projects PE-ARC-02009. Revision 2*.

The following general and construction guidelines were followed and referred to during the environmental assessment process:

- TII (December 2025) *Transport Infrastructure Ireland Biodiversity Metric Tool for Road, Greenway and Light Rail Projects: User Guide Document GE-ENV-01112*;

- TII (December 2020) *The Management of Invasive Alien Plant Species on National Roads – Standard GE-ENV-01104*;
- TII (December 2020) *The Management of Invasive Alien Plant Species on National Roads – Technical Guidance GE-ENV-01105*;
- National Biodiversity Data Center, TII, Iarnród Éireann, Translink and the Department of Infrastructure Northern Ireland (August 2019) *Pollinator-friendly management of: Transport Corridors ISSN 2009-6852*.
- TII (December 2006) *Guidelines for the Treatment of Otters Prior to the Construction of National Road Schemes CC-ENV-01104*;
- TII (December 2006) *Guidelines for the Protection and Preservation of Trees, Hedgerows and Scrub Prior to, During and Post Construction of National Road Schemes GE-ENV-01110*;
- TII (December 2005) *Guidelines for the Treatment of Badgers prior to the Construction of National Road Schemes CC-ENV-01103*;
- TII (December 2005) *Guidelines for the Treatment of Bats during the Construction of National Road Schemes CC-ENV-01102*;
- TII (December 2005) *Guidelines for the Crossing of Watercourses during the Construction of National Road Schemes CC-ENV-01101*;
- TII (2025) *Transport Infrastructure Ireland Carbon Tool for Road, Greenway and Light Rail Projects: User Guidance Document GE-ENV-01106*. Revision 3;
- TII (February 2006) *A Guide to Landscape Treatments for National Road Schemes in Ireland GE-ENV-01102*;
- TII (July 2012) *Guidelines on the Implementation of Landscape Treatment on National Road Schemes in Ireland GE-ENV-01103*;
- TII (May 2024) *Design and Delivery of Soft Landscape Treatments in Urban Transport Environments - Overarching Technical Document GE-ENV-03002*;
- TII (December 2017) *The Management of Waste from National Road Construction Projects GE-ENV-01101*; and
- TII (December 2007) *Guidelines for the Creation, Implementation and Maintenance of an Environmental Operating Plan GE-ENV-01109*.

Other legislation, guidelines and standards from TII and other bodies have been taken into account in the relevant technical assessment chapters of this EIAR and are referenced in those chapters.

Each environmental factor assessed in this EIAR sets out the legislative context, policy context and guidance relevant to that environmental factor.

In addition to the applicable EIA legislation and guidance, all EU Directives and national legislation relating to the specialist areas have also been considered as part of the process and are addressed in each of the relevant assessment chapters contained in this EIAR.

### 1.4.3 EIAR Contributors

The EIA Directive requires the developer to ensure that the EIAR is prepared by competent experts. ROD has led the preparation of this EIAR with the assistance of several specialists. Table 1.1 outlines the name of the authors of each EIAR chapters, their qualifications and experience.

**Table 1.1 EIA Contributors – Qualifications and Experience**

Topic	Specialist Contributors	Company	Qualifications	Experience (Years)
Chapter 1: Introduction Chapter 2: Policy Context and Need for Proposed Development Chapter 3: Assessment of Alternatives Chapter 4: Description of the Proposed Development	Gemma Rothwell	ROD	B.Sc. (Hons), PIEMA, Adv Dip. Planning & Environmental Law	9
	Deirdre Neff	ROD	B.E. M.I.E.I., C.Eng., M.Sc.	16
	Eoin Ó Catháin	ROD	B.E. MSc PGradDip(2) CEng MIEI FConsEI CertIOSH MCI Arb	22
Chapter 5: Traffic and Transportation	Deirdre Neff	ROD	B.E. M.I.E.I., C.Eng., M.Sc.	16
	Eoin Ó Catháin	ROD	B.E. MSc PGradDip(2) CEng MIEI FConsEI CertIOSH MCI Arb	22
Chapter 6: Population Chapter 7: Human Health	Gemma Rothwell	ROD	B.Sc. (Hons), PIEMA, Adv Dip. Planning & Environmental Law	9
	Frances O'Kelly	ROD	B.Sc., M. Sc. M.I.P.I.	16
Chapter 8: Biodiversity	Patrick O'Shea	ROD	B.A., M.Sc., M.C.I.E.E.M	11
Chapter 9: Land and Soils	Paul Kissane	ROD	B.A., B.A.I., Ph.D., C.Eng. M.I.E.I., R.o.G.E.P.	22
Chapter 10: Hydrology	John Cody	ROD	B.Sc., M.Sc.	9
Chapter 11: Hydrogeology	Nuria Manzananas	DNV	B.Sc., M.Sc.	12
Chapter 12: Air Quality	Ciara Nolan	AWN Consulting	BSc Eng., MSc., MIEEnvSc, MIAQM	8
Chapter 13: Climate	Ciara Nolan	AWN Consulting	BSc Eng., MSc., MIEEnvSc, MIAQM	8
Chapter 14: Noise and Vibration	Leo Williams	AWN Consulting	B.Sc. Env.	17
Chapter 15: Landscape & Visual Amenity	Jamie Ball	CSR	B.A (Hons), MILI	16
Chapter 16: Cultural Heritage	Faith Bailey	IAC	M.A., B.A. (Hons), M.C.If.A.	21
Chapter 17: Material Assets and Land (Agricultural)	John Bligh	John Bligh & Associates	BA. Ag., MSc, MASA, MACA	23

Topic	Specialist Contributors	Company	Qualifications	Experience (Years)
Chapter 18: Material Assets and Land (Non-Agricultural)	Gemma Rothwell	ROD	B.Sc. (Hons), PIEMA, Adv Dip. Planning & Environmental Law	9
Chapter 19: Major Accidents & Disasters	Deirdre Neff	ROD	B.E. M.I.E.I., C.Eng., M.Sc.	16
Chapter 20: Interactions and Cumulative Effects	Gemma Rothwell	ROD	B.Sc. (Hons), PIEMA, Adv Dip. Planning & Environmental Law	9
Chapter 21: Summary of Mitigation and Monitoring Measures	Laura Lynch	ROD	B.Sc. (Hons), AIEMA, Adv Dip. Planning & Environmental Law	10

## 1.5 Consultation

Consultation during the design and environmental impact assessment process is a key element as part of any project. An overview of the statutory, non-statutory and public consultations that has informed the design and environmental assessments throughout the preparation of this EIAR is presented below. The main consultations held as part of the project development include the following:

- Non-Statutory Public Consultation No.1 on the study area with indicative route options (September/October 2021)
- Non-Statutory Public Consultation No.2 illustrating Route Corridor Options (September 2022)
- Non-Statutory Public Consultation No.3 illustrating the Emerging Preferred Route Corridor (March 2024).
- Non-Statutory Informal EIA Scoping Report issued to Prescribed Bodies (January 2026).
- Pre-Application Consultation with An Coimisiún Pleanála (March 2026).

### 1.5.1 Non-statutory Public Consultations

Three No. non-statutory public consultations have been held for the proposed development throughout the Option Selection Stage. For each of these public consultation events, the public consultation material was made available online on the project website and/or the website of CCC, as well as being available for inspection at local venues for the duration of the event. The public were given the option to submit their observations online or through the completion of hardcopy feedback forms to be submitted at the PC venues or by post to CCC. Advertisements were put in the local newspaper and were aired on the local Radio Station in advance of each of the events. For all three public consultations, a telephone facility was also made available through ROD.

#### Public Consultation No.1

A Non-Statutory Public Consultation illustrating the Study Area for the proposed development, along with a map of indicative route options, was held online due to COVID-19 restrictions, from 13<sup>th</sup> September to 4<sup>th</sup> October 2021. The public consultation brochure, comment form and route option drawings were also put on display during this period at the Kilrush Public Library, the Sweeney Memorial Library in Kilkee, and the CCC offices in Ennis.

A total of 39 submissions were received during the first public consultation period. Eight submissions were in favour of the greenway, two were not opposed to the development and the remaining submissions did not include an opinion. Submissions highlighted a number of interests and concerns. Submissions showed interest in the use of the railway corridor and railway stations as part of the route, and in the route following the shoreline. Mixed responses were received regarding the bridging of Poulnasherry Bay and the use of public roads as part of the greenway, while a number of concerns were raised surrounding child safety, privacy and security, and agricultural operations.

### **Public Consultation No.2**

A Non-Statutory Public Consultation on the Route Corridor Options was held between 9<sup>th</sup> September to 30<sup>th</sup> September 2022. Two in-person information sessions were held during this period on the 14<sup>th</sup> September in Kilrush Public Library and the 15<sup>th</sup> September in the Sweeney Memorial Library, Kilkee. Both sessions began at 3:30pm and concluded at 8:30pm, with project team members from CCC and ROD in attendance to inform the public of the key features of the project, to gather any comments or observations they may have and to answer questions which they may have.

21 submissions of feedback were received. Multiple submissions expressed positive sentiment towards the development, while the remaining provided constructive feedback. No submission directly expressed an opposition to the greenway. An interest was expressed in the use of Kilrush and Kilkee railway stations as information points and following the route of the disused railway corridor as closely as practicable. Concerns raised surrounding the development included privacy and security issues due to routes running close to properties and privately-owned infrastructure, land-take, access and routing through private lands, flood risks, CPO impact upon stocking rates as per the Nitrates Directive and safety concerns regarding vehicular traffic, injury risk and the spread of TB.

### **Public Consultation No.3**

A Non-Statutory Public Consultation on the Emerging Preferred Route Corridor was held from 15<sup>th</sup> March to 12<sup>th</sup> April 2024. Two in-person information evenings were held during the public consultation period on the 20<sup>th</sup> March 2024 in the Sweeney Memorial Library, Kilkee and on the 21<sup>st</sup> March 2024 in the Kilrush Public Library. Both information evenings ran from 3:30pm to 8:00pm, with project team members from CCC and ROD in attendance to inform the public of the key features of the project, to gather any comments or observations they may have and to answer questions which they may have.

In response to the public consultation, 50 submissions were recorded. 22 of these submissions were in explicit support of the development. As observed in previous consultation, strong interest in following the West Clare Railway route was shown. A number of concerns were again highlighted, regarding impacts upon agricultural operations, environmental impact and residential issues such as privacy and increased traffic congestion.

#### **1.5.2 Non-Statutory Informal EIA Scoping Report**

As stated in the EPA Guidelines (2022, p. 23), *“Scoping’ is a process of deciding what information should be contained in an EIAR and what methods should be used to gather and assess that information”*.

Chapter 3 Assessment of Alternatives of this EIAR summarises the option selection process that led to the development proposal as described in Chapter 4 Description of the Proposed Development. To this end, an Informal EIA Scoping Document was developed which set out a preliminary scope for the EIAR for the proposed development. The document was issued to the following prescribed bodies and stakeholders in January 2026, who were invited to submit comments:

- An Taisce – The National Trust for Ireland
- An Chomhairle Ealaíon (The Arts Council)
- An Coimisiún Pleanála
- An Garda Síochana
- Badgerwatch Ireland
- Bat Conservation Ireland
- Birdwatch Ireland
- Bord Gáis
- Bord na Móna
- Bus Éireann
- Clare County Council
- Commission for Railway Regulation
- Commission for Regulation of Utilities (CRU)
- Construction Industry Federation
- Córas Iompair Éireann
- Department of Agriculture Food and the Marine
- Department of Climate, Energy and the Environment
- Department of Culture, Communications, and Sport
- Department of Enterprise, Tourism and Employment
- Department of Housing, Local Government and Heritage
- Department of Justice, Home Affairs and Migration
- Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation
- Department of Rural and Community Development and the Gaeltacht
- Department of Transport
- Development Applications Unit (National Monument Service)
- Development Applications Unit (National Parks and Wildlife Service) (NPWS)
- Eir
- Eirgrid
- Electricity Supply Board (ESB)
- Ennis Chamber of Commerce
- Enterprise Ireland
- Environmental Protection Agency
- Fáilte Ireland
- Galway County Council
- Gas Networks Ireland
- Geological Survey of Ireland
- Health & Safety Authority
- Health Service Executive
- IDA (Ireland's Foreign Direct Investment Agency)

- Inland Fisheries Ireland
- Irish Aviation Authority
- Irish Business and Employers Confederation (IBEC)
- Irish Farmers Association – Clare Office
- Irish Landscape Institute
- Irish Wheelchair Association
- Limerick County Council
- Local Authority Biodiversity Officer
- Local Authority Heritage Officer
- National Museum of Ireland
- National Transport Authority
- Road Safety Authority
- Royal Irish Academy: Committee For Historical Studies
- Sport Ireland
- SSE Airtricity
- Tipperary County Council
- Transport Infrastructure Ireland
- Teagasc
- The Heritage Council
- The Irish Cycling Campaign (ICC)
- The Office of Public Works - Head Office
- The Southern Regional Assembly
- Uisce Éireann (Irish Water)
- Waterways Ireland

A total of 12 responses were received as summarised in Table 1.2 below.

**Table 1.2 Responses received from prescribed bodies and key stakeholders following Informal EIA Scoping Consultation**

Prescribed body / stakeholder	Summary of submission received
<b>Bat Conservation Ireland (Received 15/01/2026)</b>	
<b>Bat Conservation Ireland</b>	<ul style="list-style-type: none"> <li>• Bat Conservation Ireland does not have the capacity to engage in consultation and will not provide a response to the Scoping Report.</li> </ul>
<b>Gas Networks Ireland (Received 15/01/2026)</b>	
<b>Gas Networks Ireland</b>	<ul style="list-style-type: none"> <li>• Gas Networks Ireland has no recorded Gas Network within the area of the proposed development.</li> <li>• A current gas network map must be obtained prior to works and kept on site while works take place.</li> <li>• Safe digging practices must be followed. All work in the vicinity of a gas transmission pipeline must be carried out in compliance with the Health and Safety Authority Code of Practice for Avoiding Danger from Underground Services.</li> </ul>

	<ul style="list-style-type: none"> <li>• Before starting work any work in the vicinity of the gas network, please refer to the Gas Networks Ireland safety booklet, <i>Safety advice for working in the vicinity of natural gas pipelines</i>.</li> </ul>
<b>Irish Farmer's Association (Received 19/01/2026)</b>	
<b>Irish Farmer's Association</b>	<ul style="list-style-type: none"> <li>• The IFA believe greenways should be developed, wherever possible, upon public lands, not privately owned farmland.</li> <li>• The IFA is completely opposed to the use of Compulsory Purchase Orders for greenway projects. Voluntary Land Acquisition Agreements are the appropriate mechanism.</li> <li>• The IFA deems greenways as amenity projects, not essential public infrastructure.</li> <li>• The IFA notes the impact of a greenway upon a working farm- severance, biosecurity risks and disruption to operations can be severe and are not justified for the development of a recreational project.</li> <li>• In the case of the West Clare Railway Greenway, the railway corridor has been integrated into private properties, with the corridor now containing houses, yards and used as productive farmland. It is not "abandoned" infrastructure.</li> <li>• The IFA highlights that greenways will only succeed where there is community support and notes the role of farmers in rural communities.</li> <li>• Landowners impacted by greenway developments have raised concerns regarding a loss of privacy, safety risks, the spread of animal disease and dog-related issues.</li> <li>• The IFA will continue to constructively engage with the West Clare Railway Greenway project and will continue to highlight the concerns of farmers.</li> </ul>
<b>Department of Agriculture, Food and the Marine (Received 26/01/2026)</b>	
<b>Department of Agriculture, Food and the Marine</b>	<ul style="list-style-type: none"> <li>• The Department welcomes the opportunity to provide input with reference to agricultural land and impacts that the project will have on existing field boundaries.</li> <li>• The Department requests the project be cognisant of the EIA (Agriculture) Regulations and the requirements for screening/consent.</li> </ul>
<b>Irish Cycling Campaign (Received 28/01/2026)</b>	
<b>Irish Cycling Campaign</b>	<ul style="list-style-type: none"> <li>• Respond positively to the broad scope of the EIA, the use of inclusive language (non-motorised users as opposed to vulnerable road users) and the decision to route the greenway along much of the disused railway.</li> <li>• Recommends a health benefit assessment be included as part of the EIA.</li> </ul>
<b>Royal Irish Academy Committee for Historical Studies (Received 06/02/2026)</b>	
<b>Royal Irish Academy Committee for Historical Studies</b>	<ul style="list-style-type: none"> <li>• The proposed development should account for the presence of recorded and unrecorded archaeological features. The appropriate expert should be engaged at the earliest opportunity to ensure compliance with statutory requirements.</li> <li>• It is recommended that the project team contact the DHLG's National Monument Service and Architectural Heritage Unit for direct consultation as appropriate.</li> <li>• Recommends early and thorough consultation of the registers of the Royal Irish Academy and National Museum of Ireland.</li> <li>• Built and archaeological heritage has the potential to add a layer of appreciation of the surrounding landscape. Outreach and community focused events and communications should be a feature of any mitigation project which results from the proposed project.</li> <li>• It is also recommended that special consideration is applied to works adjacent riverine and wetland locations given the likelihood for the presence of archaeological objects in such areas. The need for adequate</li> </ul>

	<p>conservation facilities for waterlogged material should also be considered.</p> <ul style="list-style-type: none"> <li>• Indirect and intangible impacts upon cultural heritage should also be included, such as impacts upon the setting of monuments and traditions and folklore.</li> </ul>
<b>Geological Survey Ireland (Received 09/02/2026)</b>	
<b>Geological Survey Ireland</b>	<ul style="list-style-type: none"> <li>• Recommends use of the various GSI data sets when conducting the EIAR, planning and scoping processes.</li> <li>• GSI would appreciate receiving a copy of any reports detailing site investigations.</li> </ul>
<b>Road Safety Authority (Received 13/03/2026)</b>	
<b>Road Safety Authority</b>	<ul style="list-style-type: none"> <li>• The RSA notes the recent significant increase in road fatalities in 2025.</li> <li>• The provision of segregated walking and cycling facilities will enhance the safety of vulnerable road users and encourage greater uptake of active travel.</li> <li>• The RSA notes limiting the use of the existing road network will maximise safety benefits to vulnerable road users.</li> <li>• The RSA supports the proposed development in regard to road safety improvements but acknowledges the RSA are unable to comment on other aspects of the proposed development.</li> </ul>
<b>Fáilte Ireland (Received 18/02/2026)</b>	
<b>Fáilte Ireland</b>	<p>Policy Background</p> <ul style="list-style-type: none"> <li>• Notes reference should be made to the most recent National Tourism Policy published in December 2025, 'A New Era for Irish Tourism'.</li> <li>• Linkage of the proposed greenway trailheads to tourist hubs and key attractions, such as blue flag beaches, should be considered in parallel to this scheme.</li> </ul> <p>Trailheads</p> <ul style="list-style-type: none"> <li>• Recommend reference to the Visitor Amenity Best Practice Toolkit for Greenways and Blueways (November 2023).</li> </ul> <p>Accessibility</p> <ul style="list-style-type: none"> <li>• Fáilte Ireland fully supports the recommendations of the "Great Outdoors: A Guide for Accessibility" in the delivery of exceptional and inclusive visitor experiences which meets the needs and expectations of visitors with the long-term aim of Ireland being rated by visitors as an accessible and inclusive destination.</li> </ul> <p>EIAR Guidelines</p> <ul style="list-style-type: none"> <li>• The guidelines referenced in the Scoping Report, "EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects", were updated in July 2023.</li> <li>• Reference could be made to the Mobility and Outdoor Value Estimates (MOVE) pilot research project between Fáilte Ireland and TII, supported by AECOM consultants.</li> </ul>
<b>Health Service Executive (Received 18/02/2026)</b>	
<b>Health Service Executive</b>	<p><b>General</b></p> <ul style="list-style-type: none"> <li>• A site visit was undertaken by the local Environmental Health Officer.</li> <li>• In relation to food businesses; food delivery and waste routes should be considered during the construction phase to ensure it is possible to maintain the cold chain and accumulation of waste beyond acceptable levels does not occur as a result of traffic disruptions. Dust control should be increased near food businesses and a Pest Control Plan should be put in place during the construction phase to protect workers, houses,</li> </ul>

	<p>food premises and businesses. No drains or sewers should be left open to allow rodent access or egress.</p> <ul style="list-style-type: none"> <li>• Surface waters and groundwater should be adequately protected from silt run-off and any hydrocarbon contamination.</li> </ul> <p><b>Legislation</b></p> <p>The following documentation should be taken into consideration when preparing the EIA document;</p> <ul style="list-style-type: none"> <li>• Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment;</li> <li>• Environmental Impact Assessment of Projects Guidance on the preparation of the Environmental Impact Assessment Report, EU, 2017.</li> <li>• National Guidance for EIA and EIAR, in line with Directive 2014/52/EU.</li> </ul> <p>The HSE will consider the final EIAR and make comments to the Local Planning Authority.</p> <p><b>Public Consultation</b></p> <ul style="list-style-type: none"> <li>• NEHS expects public consultation to allow sufficient opportunity for the public to express their views on the proposed development. To promote the dissemination of information, it is recommended the Applicant develops a dedicated website for the proposed development and the Non-Technical Summary identifies all sensitive receptors.</li> </ul> <p><b>Population and Human Health</b></p> <ul style="list-style-type: none"> <li>• The preferred approach to assessing significant effects on Population and Human Health is the source, pathway, receptor model. Proposed mitigation measures should be identified and residual impacts should be evaluated against a recognised Health Protection Standard.</li> <li>• Impacts should not be assessed on an individual scale, but rather assess facilities in their entirety.</li> </ul> <p><b>Noise and Vibration</b></p> <ul style="list-style-type: none"> <li>• The EIAR should consider the effectiveness of all proposed mitigation measures to minimise disturbance during construction.</li> </ul> <p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• A CEMP should be included alongside the main EIAR which details potential sources of dust, and dust control and mitigation.</li> </ul> <p><b>Water Quality (Surface and Groundwater)</b></p> <ul style="list-style-type: none"> <li>• The HSE acknowledges the proposed development has the potential to have a significant impact on water quality during construction. Any potential significant impacts to drinking water sources should be assessed.</li> </ul> <p><b>Ancillary Facilities</b></p> <ul style="list-style-type: none"> <li>• The EIAR should include details of ancillary facilities such as site offices, construction compounds, fuel storage depot, sanitary accommodation and canteen, First Aid facilities, disposal of wastewater and the provision of a potable water supply.</li> </ul> <p><b>Climate</b></p> <ul style="list-style-type: none"> <li>• The EIA should assess factors which contribute to climate change as a result of the development, including an assessment of GHG emissions, energy use, water usage and waste generation.</li> <li>• The proposed development should also consider climate adaptability. This includes resilience to severe weather and a vulnerability assessment which focuses on direct weather-related hazards.</li> <li>• There should be a risk-reduction schedule which considers specific risks from climate change.</li> </ul>
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<b>Minister for Housing, Local Government and Heritage (Received 18/02/2026)</b>	
<b>Minister for Housing, Local Government and Heritage</b>	<p>Archaeology</p> <ul style="list-style-type: none"> <li>• The Department awaits the assessment and subsequent results of the Cultural Heritage Impact Assessment before commenting upon the archaeological implications of the proposed development. The current level of detail is insufficient to provide an informed response.</li> <li>• The Department recognises that the Client is obliged to retain the services of a Consultant Archaeologist to carry out an Archaeological Impact Assessment.</li> <li>• The Department notes the Cultural Heritage Impact Assessment should include an assessment of the possible effects of the proposal on the wider landscape, particularly given the site is located within a wider area of known archaeological settlement and activity.</li> <li>• It should also be noted an absence of recorded archaeological sites/monuments may be related to a lack of surveying as opposed to a lack of sites/monuments.</li> <li>• The Department recommends a thorough desk-study accompanies field inspection and Visual Impact Assessment. The desk-study and field inspection should inform targeted non-intrusive advance geophysical survey or prospection, targeted advance archaeological test excavation and all intrusive advance investigations.</li> <li>• The Visual Impact Assessment should set out the key characteristics of the monument(s) and surrounds, assess all effects of the proposed development upon these key characteristics and be supported by appropriate illustration of the monument and its setting.</li> <li>• Material on site (Stockpiles, etc.) may have an adverse visual impact on the monuments present in the area, altering aspects of their original function and layout.</li> <li>• The Department offers, if required, advice and clarification on suitable assessments.</li> </ul> <p>Nature Conservation</p> <ul style="list-style-type: none"> <li>• The Department is not in a position to make specific comment at this time.</li> </ul>
<b>Uisce Éireann (Received 20/02/2026)</b>	
<b>Uisce Éireann</b>	<p>General</p> <ul style="list-style-type: none"> <li>• Several points of interaction are noted between the preferred route of the proposed development and Uisce Éireann assets.</li> <li>• Uisce Éireann requires minimum separation distances from assets, as outlined in the Uisce Éireann codes of practice and standard details. It is requested that prior to any planning application submission, the applicant shall submit diversion enquiry to Uisce Éireann regarding these or any other potential interactions and receive a Confirmation of Feasibility (COF) letter from Diversions Dept, that will form part of the formal planning application lodgement documentation.</li> <li>• Should the final design of the proposed development include facilities requiring an Uisce Éireann service connection, a pre-connection enquiry should be submitted.</li> <li>• The letter outlined other general aspects of water &amp; wastewater services which should be considered in the scope of an EIAR where relevant.</li> </ul>

Due consideration has been given to the responses received in determining the scope of the EIAR for the proposed development. Details of responses are discussed, where appropriate, in the relevant specialist chapters of the EIAR.

### **1.5.3 Pre-Application Consultation with An Coimisiún Pleanála**

Under Section 51A of the Roads Act 1993, as amended, CCC requested a pre-application consultation with An Coimisiún Pleanála regarding the proposed development. Subsequently, a pre-application consultation meeting was held on the 5<sup>th</sup> of March 2026.

## **1.6 Design of the Proposed Development and the EIA Process**

It should be noted that the information which forms the basis of this EIAR is based on the design of the proposed development as it is detailed in Chapter 4 Description of the Proposed Development. This design has been developed to a stage that permits completion of a fully informed EIA. While some refinements of the current design may occur during the detailed design or construction stage (i.e. after the completion of the EIA), any such minor modifications to the design of the proposed development will not give rise to any significant adverse environmental impacts over and above those already identified and addressed within this EIAR and as imposed by Conditions by the competent authority, An Coimisiún Pleanála.

## **1.7 Difficulties Encountered**

There were no difficulties encountered in the compilation of this EIAR. Difficulties encountered during the specialist assessments are detailed in the relevant chapters of this EIAR, for example some limitations on land access for survey work. In these circumstances, detailed desktop assessment and mitigation measures have been deemed sufficient by the relevant competent expert for the purpose of this EIAR.