

## Ciara McGuinness

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**From:** Eoin Gilson  
**Sent:** Wednesday 12 August 2020 09:18  
**To:** 'CorporateSupport.Unit@DCCAE.gov.ie'  
**Subject:** FW: Request for electronic notice  
**Attachments:** EIA SD F1 - 2020.07.20 - 190450a .pdf; 190450-a - Scoping Letter - F - DCCE.pdf

Hi,

Please find attached electronic copy of the Scoping Document for a housing development at Bearnna, Co.Galway.

Regards,



Eoin Gilson BSc MSc (Env.)  
Environmental Scientist

**MKO**  
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[www.mkoireland.ie](http://www.mkoireland.ie)



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**From:** MKO-Admin <[info@mkoireland.ie](mailto:info@mkoireland.ie)>  
**Sent:** Tuesday, 11 August 2020 10:03  
**To:** Eoin Gilson <[egilson@mkoireland.ie](mailto:egilson@mkoireland.ie)>  
**Subject:** FW: Request for electronic notice

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**From:** CorporateSupport.Unit <[CorporateSupport.Unit@DCCAE.gov.ie](mailto:CorporateSupport.Unit@DCCAE.gov.ie)>  
**Sent:** Tuesday 11 August 2020 10:01  
**To:** MKO-Admin <[info@mkoireland.ie](mailto:info@mkoireland.ie)>  
**Cc:** CorporateSupport.Unit <[CorporateSupport.Unit@DCCAE.gov.ie](mailto:CorporateSupport.Unit@DCCAE.gov.ie)>  
**Subject:** Request for electronic notice

Good morning,

Corporate Support Unit received the attached letter from MKO Ireland regarding an EIA Scoping document for a housing development at Bearnna, Co.Galway. As the Department's offices are closed due to the Covid 19 pandemic Corporate Support Unit are unable to gain access to complete hard copy notices. Can please forward the complete electronic version of this notice to [CorporateSupport.Unit@DCCAE.gov.ie](mailto:CorporateSupport.Unit@DCCAE.gov.ie) including links to any documents that are available online.

Thank you for your cooperation.

Regards,  
Enda Brady,  
Corporate Support Unit,  
Department of Communications, Climate Action and Environment.  
01 678 2308

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Tá eolas sa teachtaireacht leictreonach seo (agus b'fhéidir sa chomhaid ceangailte leis) a d'fhéadfadh bheith príobháideach nó faoi rún. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo. Más trí earráid a fuair tú an teachtaireacht leictreonach seo cuir, más é do thoil é, an té ar sheol an teachtaireacht ar an eolas láithreach. Deimhnítear leis seo freisin nár aims odh víreas sa phost seo tar éis a scanadh.

## Ciara McGuinness

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**From:** Environmental Co-ordination (Inbox) <Environmental\_Co-ordination@agriculture.gov.ie>  
**Sent:** Tuesday 28 July 2020 14:16  
**To:** Eoin Gilson  
**Subject:** RE: 190450-a Burkeway Bearna EIAR Scoping Document

To Whom it Concerns,

I refer to your recent correspondence concerning the above and wish to state that at this time the Department of Agriculture, Food and the Marine has no submissions or observations in regards to same.

Yours sincerely,

Breeda Hennebry

---

**From:** Eoin Gilson [mailto:egilson@mkoireland.ie]  
**Sent:** 22 July 2020 14:26  
**To:** Environmental Co-ordination (Inbox)  
**Subject:** 190450-a Burkeway Bearna EIAR Scoping Document

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Dear Sir/Madam,

Please see attached cover letter and EIAR Scoping document for a proposed housing development in Bearna, Co. Galway.

Kind Regards,

Eoin Gilson.



Eoin Gilson BSc MSc (Env.)  
Environmental Scientist

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**Department of Agriculture, Food and the Marine**

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**An Roinn Talmhaíochta, Bia agus Mara**

Tá an t-eolais san ríomhphost seo, agus in aon ceanglín leis, faoi phribhléid agus faoi rún agus le h-agmaigh an seolaí amháin. D'fhéadfadh ábhar an seoladh seo bheith faoi phribhléid profisiúnta nó dlíthiúil. Mura tusa an seolaí a bhí beartaithe leis an ríomhphost seo a fháil, tá cosc air, nó aon chuid de, a úsáid, a chóipeál, nó a scaoileadh. Má tháinig sé chugat de bharr dearmad, téigh i dteagmháil leis an seoltóir agus scríos an t-ábhar ó do ríomhaire le do thoil.

**Ciara McGuinness**

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**From:** MKO-Admin  
**Sent:** Wednesday 5 August 2020 17:28  
**To:** Eoin Gilson  
**Subject:** FW: FAO Eoin Gilson EIA Scoping for proposed development at Bearna, Galway

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**From:** euplanningregulation <euplanningregulation@housing.gov.ie>  
**Sent:** Wednesday 5 August 2020 15:57  
**To:** MKO-Admin <info@mkoireland.ie>  
**Subject:** FAO Eoin Gilson EIA Scoping for proposed development at Bearna, Galway

Dear Eoin,

I refer to recent correspondence received by this Department in relation to the above specified development and the request for comments in respect of the associated EIA Scoping report.

I wish to advise that under Section 30 of the Planning and Development Act 2000, as amended, the Minister, and by extension this Department, is specifically precluded from exercising any power or control in relation to any particular case with which a planning authority or An Bord Pleanála is or may be concerned.

Kind regards  
Morgan

**Morgan O Reilly**  
*EU and International Planning Regulation, Planning Division*

---

**An Roinn Tithíochta, Pleanála agus Rialtais Áitiúil**  
Department of Housing, Planning and Local Government

Teach an Chustaim, Baile Átha Cliath 1. D01 W6X0  
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\*\*\*\*\*

Is faoi rún agus chun úsáide an té nó an aonán atá luaite leis, a sheoltar an ríomhphost seo agus aon comhad atá nasctha leis. Má bhfuair tú an ríomhphost seo trí earráid, déan teagmháil le bhainisteoir an chórais.

Deimhnítear leis an bhfo-nóta seo freisin go bhfuil an teachtaireacht ríomhphoist seo scuabtha le bogearraí frithviorais chun viorais ríomhaire a aimsiú.

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**Fáilte Ireland**  
National Tourism Development Authority

## **EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects**



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## 1. Introduction

Tourism is a growing sector and substantial part of the Irish Economy. It contributes to both urban and rural economies in every part of the country. The impact and interaction of tourism with the environment is complex and the assessment of environmental impacts is of utmost importance to creating a sustainable tourism economy and protecting the natural resources that are so often a tourism attraction.

The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

This guidance document has been prepared by Cunnane Stratton Reynolds on behalf of Fáilte Ireland to update their EIA guidelines in line with changes in legislative requirements.

## 2. Background to this Document

Tourism is one of the largest and most important sectors of the economy, providing employment for approximately **260,000 people**, an economic contribution of **€8.4 billion**, and exchequer revenue of **€1.78 billion** in 2018, which helps fund other key public services.

In 2018 Ireland welcomed **10.6 million overseas visitors**.

Fáilte Ireland is the National Tourism Development Authority. Fáilte Irelands role is to support the tourism industry and work to sustain Ireland as a high-quality and competitive tourism destination. They provide a range of practical business supports to help tourism businesses better manage and market their products and services.

Fáilte Ireland also work with other state agencies and representative bodies, at local and national levels, to implement and champion positive and practical strategies that will benefit Irish tourism and the Irish economy.

Fáilte Ireland promotes Ireland as a holiday destination through a domestic marketing campaign (DiscoverIreland.ie) and manage a network of nationwide tourist information centres that provide help and advice for visitors to Ireland.

Tourism related projects cover a broad range of plans, programmes and developments, from the Wild Atlantic Way to a single hotel conversion. These guidelines apply to projects involving or impacting upon tourism. A tourism plan, strategy or programme where it is part of the statutory plan making process under the Planning and Development Acts (as amended), may be more appropriately assessed by a Strategic Environmental Assessment (SEA) as discussed in the next section.

It should be borne in mind that EIA is required where there is anticipated to be a significant impact on the environment, where tourism projects are of a prescribed type or meet thresholds identified below.



Where Natura 2000 Designated Sites are potentially affected by tourism development Appropriate Assessment must be carried out by the appropriate authority in accordance with Article 6(3) of the EU Habitats Directive.

### **3. Legislation and Statutory Guidance**

Environmental Impact Assessment is a procedure that ensures that the environmental implications of decisions are taken into account before planning based decisions are made. The assessment results in a report, called an Environmental Impact Assessment Report (EIAR).

#### ***Legislation***

These guidelines are produced under current EIAR legislative requirements, having regard to Directive 2011/92/EU (known as 'Environmental Impact Assessment' – EIA Directive), as amended by Directive EU 2014/52 which came into effect in May of 2017. These requirements were transposed into Irish Law on 1 September 2018 as most of the provisions of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) came into effect. The principle of both Directives is to ensure that plans, programmes and projects likely to have significant effects on the environment are made subject to an environmental assessment, prior to their approval or authorisation.

#### ***Statutory Guidance***

In response to the changes to the EIAR requirements under Directive EU 2014/52, the Environmental Protection Agency (EPA) developed Draft guidelines on the information to be contained in Environmental Impact Assessment Reports in August 2017. At the time of this document the guidelines have not been adopted from draft.

In addition to the EPA statutory guidance, the Department of Housing has produced Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment in August 2018.

The process of EIA is set out in the EPA EIAR Guidelines, which this document should be read in conjunction with and used as supplementary guidance to. The process for ascertaining whether an EIAR is required is known as 'screening' and the process to determine the breadth and scope of an EIAR is known as 'scoping'. Guidance on this can be found in Section 3.2 of the EPA Guidelines.

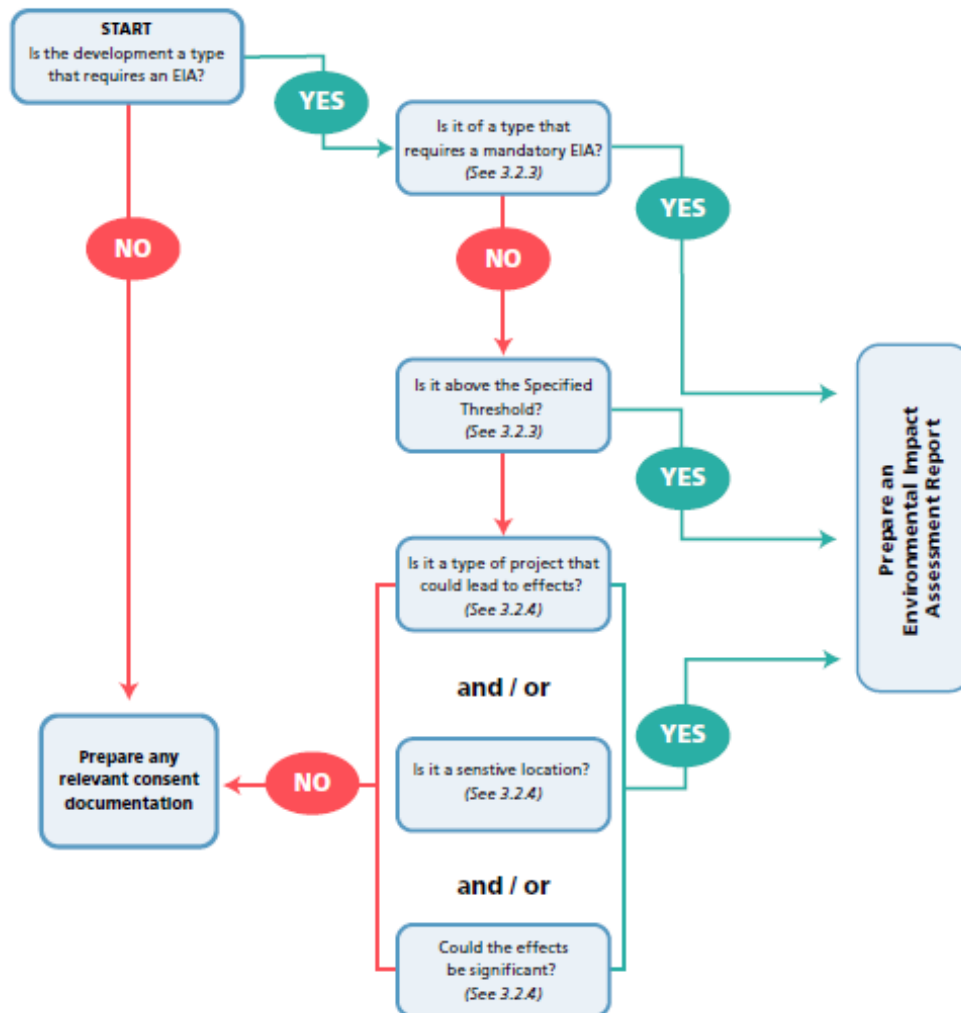
#### ***Screening***

Through EIAR Screening, developments are either considered as requiring an EIAR due to the project type or because they exceed a threshold level. The screening process begins by establishing whether the proposal is a 'project' as understood by the Directive (as amended).

The prescribed development types and thresholds are set out in Annex I and II of the EIA Directive as transposed into Schedule 5 of the Planning and Development Regulations 2010-2018 (as amended). Development which do not exceed these thresholds but may require an EIAR are called sub threshold. Sub-Threshold considerations are outlined in Schedule 7 of European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) as transposed from Annex III of the Directive. The Guidelines on Environmental Impact Assessment Reports note that projects at first glance may not appear to come under the Schedule

but on closer examination when the process is further examined, they may do so because of the sensitivity or significance of the receiving environment etc. Sub threshold developments require an EIAR if they are likely to have significant environmental impacts and must undergo assessment for likely significant impacts through an EIAR screening report. The contents of a screening report for subthreshold development are contained in Annex III of the EIA Directive.

Figure 1: EIAR Screening Process



(Taken from Fig 3.2 of the EPA Guidelines)

Tourism locations should be identified as sensitive receptors in screening assessments for particular impacts, depending on scale and sensitivity, as they would in a full EIAR. Section 6 below can act as guidance for Screening Reports as well as for full EIAR.

The screening process for considering where an EIAR is necessary, is summarised below in Figure 1 (excerpted from Figure 3.2 of the EPA Guidelines).

Strategic Environmental Assessment (SEA) is a more strategic level of environmental assessment that examines plans, policies, objectives and programmes specifically rather than projects. For some tourism developments it may be more appropriate that they be examined through SEA, while individual projects or specific proposals are likely to be more assessed through EIAR. If a project is part of a plan, programme or policy/objective assessed by SEA there will still be a requirement for an EIAR for that development.

## *EIAR Scoping*

Scoping an EIAR is an opportunity to look at the breadth of issues and ensure that any areas of possible significant impact are assessed. Identifying sensitivities and stakeholders should take account of tourism facilities and consider Fáilte Ireland in scoping requests where necessary.

### **4. Assessing Tourism**

There is no legal definition of 'tourism' in Irish legislation. The UNWTO definition of sustainable tourism is "*Tourism that takes full account of its current and future economic, social and environmental impacts, addressing the needs of visitors, the industry, the environment and host communities*". This is widely accepted as a key definition of tourism as we move to a more sustainable future.

Tourism assessments are frequently carried out by economic consultants and by specific tourism consultants. It is always advisable, particular for tourism projects, that suitably qualified and experienced personnel are used to determine the impact of tourism related projects or to assess the impact of more general proposals on a tourism asset identified in a particular location. There is a requirement for EIAR under current legislation to contain a statement of competency within all EIAR documents, including screening and scoping reports.

#### ***Projects which involve a tourism element***

Tourism projects are wide ranging and diverse. While there are some projects which cater to tourism and are easily identified as such - Hotels, Museums, etc. there are other projects where tourism is a key service or element, but which may not be immediately obvious - forest trails, community facilities and others. EIAR conducted for developments containing tourist elements should be completed in accordance with the current guidance from the EPA.

Projects which include a tourism element have potential particular environmental effects which differ from a non-tourism development. These impacts can be intermittent, event related, inconsistent, dependent on weather, temporal, temporary or seasonal. This is considered within the prescribed environmental topics for EIAR outlined in Section 7 below.

#### ***Projects which may have an impact upon tourism***

While tourism projects may be diverse, the projects which can impact tourism are considerably more wide ranging, from large infrastructural developments to local energy developments. Disruption to or suppression of a tourist resource or amenity can have very local or more strategic impacts, directly or indirectly- for example energy projects in a rural area can have both a negative and positive impact in different regards. There can be temporary, periodic or even seasonal impacts occurring during construction or operational periods.

According to the Fáilte Ireland Tourism Facts 2018 Report, the most important factors in determining the attractiveness of tourism destinations for visitors to Ireland are;

- Beautiful Scenery and Unspoiled Environment
- Hospitality
- Safety
- Nature, Wildlife and Natural Attractions
- History and Culture
- Pace of Life

These factors used for the promotion of tourism in Ireland are also barometers of sensitivity to change in tourism sensitive or dominant locations where development may have an impact upon the tourism asset. The potential for development to impact these sensitivities, and the environmental criteria under which they can be considered, are identified in section 7 of the guidelines.

## **5. Guiding Principles of EIAR**

As outlined in the EPA Draft EIAR Guidelines, the fundamental principles to be followed when preparing an EIAR, including screening and scoping, are:

- Anticipating, avoiding and reducing significant effects
- Assessing and mitigating effects
- Maintaining objectivity
- Ensuring clarity and quality
- Providing relevant information to decision makers
- Facilitating better consultation.

Environmental assessment should be undertaken in accordance with the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018.

## **6. Consideration of Competency and Qualifications**

As per Section 2.5 of the EPA Guidelines, EIAR is required to be completed by 'competent experts'.

Contributors to the preparation of environmental impact assessment reports, including screening and scoping assessments, should be qualified and competent. Sufficient expertise, in the relevant field of the project concerned, is required for the purpose of its examination by the competent authorities in order to ensure that the information provided by the developer is complete and of a high level of quality so that a full and proper assessment can be undertaken.

For tourism related projects, or projects likely to affect tourism assets, competent experts in the area of tourism should be utilised in the environmental assessment.

The competency of all involved in the production of an EIAR or any related report (eg. Screening and scoping) is required to be stated at the beginning of the EIAR report with further details as necessary in each following chapter.

Where tourism projects involve for example heritage or cultural components, input from heritage consultants, conservation architects, or historians may be required.

## **7. EIAR Requirements**

The following are the key requirements for an EIAR under the current guidance. This is not a definitive list and should be read in conjunction with regulations.

- project description;
- assessment of alternatives considered;

- baseline assessment;
- impact assessment;
- cumulative impact
- interaction of impacts
- mitigation.

### ***Project Description***

Project descriptions are required to describe the whole project including site, scale, design and key factors. It is important that the EIAR and design team have a consistent understanding of the development description in full. The key requirements are outlined in section 3.5 of the EPA Guidelines however they identify the following;

- the location of the project
- the physical characteristics of the whole project
- the main characteristics of the operational phase of the project
- an estimate, by type and quantity, of the expected residues and emissions

The location of the project should include identifying key sensitive receptors (including tourism receptors). In the operational phase of the project any tourism based, or potentially tourism related activity, should be identified.

### ***Assessment of Alternatives***

The assessment of alternatives is a requirement of EIAR

Where tourism projects are location dependent the assessment of alternatives should consider alternative methods and technologies, detail the key considerations culminating in the selection of the design, the reasoning for these and the environmental effect of these decisions. This is particularly important for tourism projects which are often location tied. The developer is expected to consider reasonable alternatives. What is considered reasonable may vary from case to case.

### ***Baseline Assessment***

Baseline descriptions are evidence based, current descriptions of environmental characteristics with consideration of likely changes to the baseline environment evidenced in planning histories, unimplemented permissions, and applications pending determination. Baseline assessments should identify any tourism sensitivities in the zone of influence of a development. This zone of influence of a development is highly dependant on its **Context, Character, Significance, and Sensitivity**, as outlined in the Draft Guidelines. These characteristics apply to both the development and the environment.

For example, in a tourism context;

The location of sensitive tourism resources that are likely to be directly affected should be highlighted, and other premises which although located elsewhere, may be the subject of in combination impacts such as alteration of traffic flows or increased urban development.

The character of an area from a tourism perspective should be described and the principal types of tourism in the area. Where relevant, the specific environmental resources or attributes in the existing environment which each group uses or values should be stated and where relevant, indicate the time, duration or seasonality of any of those activities.

The significance of the tourism assets or activities likely to be affected should be highlighted. Reference to any existing formal or published designation or

recognition of such significance should be. Where possible the value of the contribution of such tourism assets and activities to the local economy should be provided.

If there are any significant concerns or opposition to the development known to exist among tourism stakeholders and interest groups, this should be highlighted. Identify, where possible, the particular aspect of the development which is of concern, together with the part of the existing tourism resource which may be threatened or impacted.

In addition, the baseline should include any methodologies employed in the study to obtain information, if particular databases are used to locate sensitive receptors they should be acknowledged. In relation to tourism information, the suggested information sources at the end of this document are a non-exhaustive list which may be of assistance in identifying tourism receptors.

### ***Impact Assessment***

The topics for consideration of impact are prescribed in the EIA Directive and transcribed into Irish law by the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018). Impact assessment should contain the likely significant effects of a development arising from both construction and operation of a development. Advice on describing the effects is contained within the Draft Guidelines and includes the **quality, significance, extent, probability, type** and **duration** of the effect, with particular descriptors for each. In describing effects upon tourism receptors these descriptors should take account of the particular aspects and sensitivities of tourism, for example a temporary annual effect from a development may have different impacts upon tourism if it falls at peak season rather than off-peak.

Impact assessment should be carried out as per EPA guidelines and the best practice for that prescribed topic. It may be considered appropriate to consider impact on tourism assets under the 'material assets' topic below.

#### Population and Human Health

The consideration of tourism projects within the Population and Human Health is extensive, with impacts ranging from rural employment population impacts of seasonal tourism, to the health impact of air pollution from increased traffic in urban areas.

The impact upon tourism can be considered within this section through the sensitivities of Hospitality, Safety and Pace of Life. Changes in population can impact the perception of pace of life or safety in a particular location. Impacts upon these issues in areas which rely heavily on tourism or have a particular sensitive tourism generator should be considered in this section.

#### Biodiversity

Particular tourist activities can have a significant impact upon biodiversity. Landscapes which are 'unspoiled' can be attractors of tourism. However, the disturbance to ecology must be managed to minimise impact. Biodiversity is also a tourism asset and should be protected as such from other development and should be provided for in proposals where possible.

#### Land, Soils and Geology

A link between tourism and this prescribed environmental factor, beyond the normal development impacts, is rare, however particular activities or facilities which use geological features may have an impact upon soils and geology, such as mountain biking trails, recreational uses of old quarries etc. Indirect impacts such as material use for extensive landscaping and public realm should also be considered.

## Water

Tourism uses can be water intense, depending on development type. Recreational use of a surface water feature, water-based leisure centres etc have different impacts to standard development.

## Air Quality and Climate

Tourism impact upon air quality is dependent on activity proposed and sensitivity of the location.

## Noise and Vibration

A link between tourism and this prescribed environmental factor, beyond the normal development impacts, is rare, however the impact upon tourism of issues of noise and vibration can be significant. Construction adjoining hotels for example should consider the sensitivity of the development and ensure mitigation is in place.

## Material Assets; Traffic and Transport

The different transport patterns associated with tourism activities is a key impact of tourism and should be considered especially for tourism projects. These produce temporal and seasonal changes on the norm and specialist consideration and interpretation should be given. Tourism proposals should, where possible, be well served by public transport and should be accessible by modes other than the car. The impact of traffic on tourism assets can be substantial and can vary in severity according to season, the weather, etc. The impact of construction traffic can be a particular concern in tourism sensitive areas in terms of noise pollution and visual impact. The construction programme of developments should work to avoid peak tourism periods in tourism areas and should consider planned or anticipated tourism events and festivals.

## Cultural Heritage

Cultural heritage can be a key component of tourism projects and the impact of tourism on the maintenance of cultural heritage should be given the utmost consideration, whether positive or negative. As a tourism attraction, cultural heritage should be strongly considered in non-tourism developments and the impact upon tourism considered as a potential impact.

## Archaeology

Archaeology can be of tourism interest and can be an attractive or key component of tourism projects. Archaeology can be a tourism attractor but is generally not kept in situ except in key cases which could also be considered under cultural heritage.

## Material Assets; Waste Management

Tourism is a resource heavy activity and can impact waste streams and waste segregation. Impacts here should be considered strongly and with knowledge of the variation that arises from the particular tourist activity. Waste and Waste disposal issues can also impact the perception of an unspoiled environment, effecting tourism, which should be considered.

## Material Assets

Material assets are utilities and infrastructure. Tourism itself could be considered a material asset as its impact upon the economy and the infrastructure in place to support it is a material consideration in assessing economic impact.

## Landscape

The visual impact of a tourism development, especially in locations which are visually sensitive or renowned for their scenic or landscape beauty, should be considered carefully. A

development intended to utilise or enjoy a particular vista or environment should minimise impact upon that environment.

### ***Major Accident and Natural Disaster***

There is a requirement for tourist developments to describe expected significant effects on the environment of the proposed development's vulnerability to major accidents and/or natural disasters relevant to it. Where appropriate measures should be identified to prevent or mitigate the significant adverse effects of such accidents or disasters, including resulting from climate change, on the environment and detail the preparedness for the proposed response.

### ***Interaction of Effects***

Where two or more environmental impacts combine or interact they should be considered under the prescribed topics. It is best practice to provide a table of interactions within an EIAR or EIAR Screening Report.

### ***Mitigation***

Mitigation should follow the hierarchy of minimisation in descending order of preference- Avoid, Reduce, Remedy

*Avoid* sensitive tourism resources- such as views, access and amenity areas including habitats as well as historical or cultural sites and structures.

*Reduce* the exposure of sensitive resources to excessive environmental impact

*Reduce* the adverse effects to tourism land uses and patterns of activities, especially through interactions arising from significant changes in the intensity of use or contrasts of character or appearance.

*Remedy* any unavoidable significant residual adverse effects on tourism resources or activities.

Mitigation measures must be measurable and achievable within the bounds of the project.

### ***Cumulative Impact***

The cumulative impact is that of the project combined with any known likely project which will interact or compound an environmental impact.

### ***Transboundary Impact***

Transboundary impacts should be included in EIAR. In the case of tourism, especially international travel, the transboundary impacts may not be proximate to the EIAR site.

## **8. Sources of information on Tourism**

### ***Information available online***

#### ***Fáilte Ireland***

Fáilte Ireland offers detailed research analysis and insights into the Irish Tourism Industry. The National Tourism Development Authority has a portfolio of research across a number of areas including facts and figures, briefing papers and reports and visitor feedback. The Fáilte Ireland website has a dedicated research library which can be accessed [here](#)



### *Tourism Ireland*

Tourism Ireland is responsible for marketing the island of Ireland overseas as a holiday and business tourism destination. Tourism Ireland publishes a range of research documents including; visitor facts and figures, seasonal updates and industry insights which are accessible [here](#)

### *Local Authorities*

Local Authorities are an invaluable source of information. They produce tourism strategies and audits of tourism assets within their jurisdiction. Local authorities will also produce landscape and seascape studies. Protected views and prospects as well as the record of protected structures and other designated protected buildings are contained within the Statutory Development Plans.

### *Regional Authorities*

Regional Authorities can also be consulted on high level strategic tourism and potential Regional Spatial and Economic Strategies (RSEs) should be consulted.

### *Central Statistics Office*

The Central Statistics Office (CSO) is Ireland's national statistical office and their purpose is to impartially collect, analyse and make available statistics about Ireland's people, society and economy. The Tourism and Travel Section of the Central Statistics Office is the major source for tourism statistics in Ireland and is updated regularly.



Eoin Gilson  
McCarthy Keville O'Sullivan Ltd.  
Tuam Road  
Galway H91 VW84

13 August 2020

**Re: EIAR Scoping Document for Proposed Strategic Housing Development at Bearná Galway**  
**Your Ref: 190450**  
**Our Ref: 20/169**

Geological Survey Ireland is the national earth science agency and has datasets on Bedrock Geology, Quaternary Geology, Geological Heritage Sites, Mineral deposits, Groundwater Resources and the Irish Seabed. These comprise maps, reports and extensive databases that include mineral occurrences, bedrock/mineral exploration groundwater/site investigation boreholes, karst features, wells and springs. Please see our [website](#) for data availability and we recommend using these various data sets, when undergoing the EIAR, planning and scoping processes. Geological Survey Ireland should be referenced to as such and should any data or geological maps be used, they should be attributed correctly to Geological Survey Ireland.

Dear Eoin,

With reference to your email received on the 22 July 2020, concerning the EIAR Scoping Document for the proposed strategic housing development at Bearná Galway, Geological Survey Ireland (a division of Department of Communications, Climate Action and Environment) would like to make the following comments.

### **Geoheritage**

Geological Survey Ireland (GSI) is in partnership with the National Parks and Wildlife Service (NPWS, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs) to identify and select important geological and geomorphological sites throughout the country for designation as geological NHAs (Natural Heritage Areas). This is addressed by the Irish Geoheritage Programme (IGH) of GSI, under 16 different geological themes, in which the minimum number of scientifically significant sites that best represent the theme are rigorously selected by a panel of theme experts.

County Geological Sites (CGS), as adopted under the National Heritage Plan are now included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online [Map Viewer](#). The audit for Co. Galway was completed in 2019. The full report details can be found at [The Geological Heritage of Galway](#). **Our records show that there are no CGSs in the vicinity of the proposed housing development.**

With the current plan, there are no envisaged impacts on the integrity of current CGSs by the proposed development. However, if the proposed development plan is altered, please contact Clare Glanville ([Clare.Glanville@gsi.ie](mailto:Clare.Glanville@gsi.ie)) for further information and possible mitigation measures if applicable.

### **Groundwater**

Groundwater is important as a source of drinking water, and it supports river flows, lake levels and ecosystems. It contains natural substances dissolved from the soils and rocks that it flows through, and can also be contaminated by human actions on the land surface. As a clean, but vulnerable, resource, groundwater needs to be understood, managed and protected.



Through our [Groundwater Programme](#), we provide advice and maps to members of the public, consultancies and public bodies about groundwater quality, quantity and distribution. Geological Survey Ireland monitors groundwater nationwide by characterising aquifers, investigating karst landscapes and landforms and by helping to protect public and group scheme water supplies. We recommend the use of our National Aquifer, Vulnerability and Recharge maps. Further information is available on our [Map viewer](#). **The Groundwater Vulnerability map indicates the area covered is variable. We would therefore recommend use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability and 'Rock at or near surface' in your EIAR.**

With regard to Flood Risk Management, there is a need to identify areas for integrated mitigation and management. **Our GWFlood project is a groundwater flood monitoring and mapping programme aimed at addressing the knowledge gaps surrounding groundwater flooding in Ireland.** The project is providing the data and analysis tools required by local and national authorities to make scientifically-informed decisions regarding groundwater flooding. **Although primarily focused on karst areas, this information may be of benefit to the housing development. We recommend using the Geological Survey Ireland's [GWFlood](#) tools found under our programme activities to this end. The flood maps and their accompanying report are available [here](#).**

With regards to Climate Change, there is a need to improve the monitoring capacity of groundwater levels in Ireland so that the potential impacts of climate change can be monitored and assessed. In this context the Geological Survey Ireland has established the GWClimate project in January 2020. GWClimate will 1) establish a long-term strategic groundwater level monitoring network and 2) develop modelling and analytical approaches for evaluating the impacts of Climate Change to Irish groundwater systems. **Further information can be found on the Groundwater flooding [page](#) of the Groundwater Programme.**

#### **Natural Resources (Minerals/Aggregates)**

Geological Survey Ireland is of the view that the sustainable development of our natural resources should be an integral part of all development plans from a national to regional to local level to ensure that the materials required for our society are available when required. Geological Survey Ireland highlights the consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process. Geological Survey Ireland provides data, maps, interpretations and advice on matters related to minerals, their use and their development in our [Minerals section](#) of the website. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our [Map Viewer](#). **We would recommend use of the Aggregate Potential Mapping viewer to identify areas of High to Very High source aggregate potential within the area. In keeping with a sustainable approach, consideration of the effects of the proposed development on aggregate potential sources such as resource sterilisation should be considered in your EIAR.**

#### **Geohazards**

Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. While in Ireland, landslides are the most prevalent of these hazards flooding is becoming an increasing risk. Geological Survey Ireland has information available on past landslides for viewing as a layer on our [Map Viewer](#). Geological Survey Ireland also engages in national projects such as Landslide Susceptibility Mapping and Groundwater Flooding ([GWFlood](#)), and in international projects, such as the Tsunami Warning System, coordinated by the Intergovernmental Oceanographic Commission of UNESCO. Historical records and geological evidence indicate that, while tsunamis are unlikely events around Ireland, the Irish coast is vulnerable to tsunamis from submarine landslides and distant earthquakes. Associated levels of coastal flooding are expected to be similar to those seen during storm surges, but with much more energetic inundation and a much shorter time to react. Ireland participates in an international tsunami detection and alerting system, coordinated by the Intergovernmental Oceanographic Commission of UNESCO. **We recommend that geohazards and particularly flooding be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so.** Coastal Vulnerability while seen as a potential geohazard, is discussed in more detail under our marine and coastal unit information below.



### **Marine and Coastal Unit**

Geological Survey Ireland's Marine and Coastal Unit manages programmes, projects and partnerships aimed at increasing our knowledge of the marine and coastal realm, developing new methods and tools for understanding coastal processes and taking action on climate change. Geological Survey Ireland's Marine and Coastal Unit in partnership with the Marine Institute, jointly manages INFOMAR, Ireland's national programme focused on seabed mapping; providing key baseline data for Ireland's marine sector. **The Marine and Coastal Unit also manage coastal monitoring programmes providing data on coastal erosion and sea level rise including the Climate, Heritage and Environments of Reefs, Islands and Headlands (CHERISH) and the Coastal Vulnerability Index (CVI) mapping projects. We would therefore recommend use of our Marine and Coastal Unit datasets available on our [website](#) and [Map Viewer](#).**

### **Other Comments**

Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. Should any significant bedrock cuttings be created, we would ask that they will be designed to remain visible as rock exposure rather than covered with soil and vegetated, in accordance with safety guidelines and engineering constraints. In areas where natural exposures are few, or deeply weathered, this measure would permit on-going improvement of geological knowledge of the subsurface and could be included as additional sites of the geoheritage dataset, if appropriate. Alternatively, we ask that a digital photographic record of significant new excavations could be provided. Potential visits from our staff to personally document exposures could also be arranged.

The data would be added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to Beatriz Mozo, Land Mapping Unit, at [Beatriz.Mozo@gsi.ie](mailto:Beatriz.Mozo@gsi.ie), 01-678 2795.

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to contact me ([Trish.Smullen@dcaae.gov.ie](mailto:Trish.Smullen@dcaae.gov.ie)), or my colleague Clare Glanville ([Clare.Glanville@dcaae.ie](mailto:Clare.Glanville@dcaae.ie)).

Yours sincerely,

Trish Smullen  
**Geoheritage Programme**  
**Geological Survey Ireland**

MKO  
Tuam Road  
Galway  
H91 VW84  
Ireland

6 August 2020

**Re: EIAR Scoping Request – Proposed Strategic Housing Development at Bearná, Co. Galway**

Dear Mr Gilson,

Irish Water (IW) acknowledges receipt of your request in respect of the Environmental Impact Assessment Report (EIAR) scoping for the Proposed Strategic Housing Development at Bearná, Co. Galway.

Please see attached our suggested scope in relation to Water Services. On receipt of the planning referral, Irish Water will review the EIAR as part of the planning process.

Queries relating to the terms and observations above should be directed to [planning@water.ie](mailto:planning@water.ie)

Yours sincerely,

Signed on behalf of Irish Water:

Maria O'Dwyer  
Connections and Development Services

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## Response to EIAR Scoping Report Requests

IW currently does not have the capacity to advise on scoping of individual projects. However, in general we would like the following aspects of Water Services to be considered in the scope of an EIAR where relevant;

- a) Impacts of the development on the capacity of water services (do existing water services have the capacity to cater for the new development if required). This is confirmed by IW in the form of a Confirmation of Feasibility (COF). If a development will require a connection to either a public water supply or sewage collection system the developer is advised to submit a Pre Connection Enquiry (PCE) enquiry to IW to determine the feasibility of connection to the Irish Water network. All pre-connection enquiry forms are available from <https://www.water.ie/connections/get-connected/>
- b) Any up-grading of water services infrastructure that would be required to accommodate the development.
- c) In relation to a development that would discharge trade effluent – any upstream treatment or attenuation of discharges required prior to discharging to an IW collection network
- d) In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks & potential measures to minimise/stop surface waters from combined sewers
- e) Any physical impact on IW assets – reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets.
- f) If you are considering a development proposal, it is best practice to contact us in advance of designing your proposal to determine the location of public water services assets. Details, where known, can be obtained by emailing an Ordinance Survey map identifying the proposed location of your intended development to [datarequests@water.ie](mailto:datarequests@water.ie). Other indicators or methodologies for identifying infrastructure located within your lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site.
- g) Any potential impacts on the assimilative capacity of receiving waters in relation to IW discharge outfalls including changes in dispersion /circulation characterises
- h) Any potential impact on the contributing catchment of water sources either in terms of water abstraction for the development (and resultant potential impact on the capacity of the source) or the potential of the development to influence/ present a risk to the quality of the water abstracted by IW for public supply.
- i) Where a development proposes to connect to an IW network and that network either abstracts water from or discharges waste water to a “protected”/sensitive area, consideration as to whether the integrity of the site/conservation objectives of the site would be compromised.
- j) Mitigation measures in relation to any of the above

*This is not an exhaustive list.*

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 T: +353 01 89 25001  
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Please note

- The Confirmation of Feasibility from IW, to the applicant, should be issued prior to applying for planning permission.
- Irish Water will not accept new surface water discharges to combined sewer networks
- Where an Irish Water asset is altered or diverted, a Diversion Agreement is required. To commence this process, the applicant is requested to submit a Diversion enquiry once a preferred route has been selected. Details on this process can be found at <https://www.water.ie/connections/developer-services/diversions/>. Any design proposal to divert an Irish Water asset must be completed in accordance with IW Standard Details and Codes of Practice which are available on the Irish Water website.
- All necessary measures to protect and maintain access to Irish Water infrastructure and water sources shall be undertaken and incorporated into any proposals for road design. Irish Water request continued engagement through the route selection, design and construction stages in order to ensure public water services and sources are protected and access is maintained.

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## Ciara McGuinness

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**From:** INFO <Information@tii.ie>  
**Sent:** Wednesday 5 August 2020 11:47  
**To:** Eoin Gilson  
**Subject:** EIAR Scoping Request to support future Strategic Housing Development (SHD) application for Bearna, Co. Galway on behalf of Burkeway Homes Ltd. TII Ref: TII20-110198. Your Ref: 190450-a

**Dear Mr. Gilson,**

Transport Infrastructure Ireland (TII) acknowledges receipt of your EIAR Scoping request by email, 22 July 2020, in respect of the above proposed project.

The issuing of this correspondence is provided as best practice guidance only and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals, following the examination of any valid application referred.

The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidance as outlined in the 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). Regard should also be had to other relevant guidance available at [www.TII.ie](http://www.TII.ie).

With respect to EIAR Scoping issues, the recommendations indicated below provide only general guidance for the preparation of EIAR, which may affect the national road network. The developer should have regard, *inter alia*, to the following:

1. As set down in the 'Spatial Planning and National Roads: Guidelines for Planning Authorities' (DoECLG, 2012), the primary purpose of the national road network is to provide strategic transport links between the main centres of population and employment, including key international gateways such as the main ports and airports, and to provide access between all regions. The EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network, in order to demonstrate that the development can proceed complementary to safeguarding the capacity, safety and operational efficiency of that network.
2. Consultations should be had with the relevant Local Authority/National Roads Design Office, regarding locations of existing and future national road schemes in the vicinity. The sites proximity to the Galway Transportation Strategy N6GCRR Scheme, which is currently before An Bord Pleanála, is noted and early consultation with Galway County Council National Roads Office is strongly advised.
3. TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads), in the proximity of the proposed development.
4. It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site, with reference to impacts on the national road network and junctions of lower category roads with national roads. TII's TTA Guidelines (2014) should be referred to in relation to proposed development, with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the Guidelines, which addresses requirements for sub-threshold TTA.



5. The designers are asked to consult [TII Publications](#) to determine whether a Road Safety Audit (RSA) is required. In this regard it is noted that a RSA is indicated as being prepared at section 2.2.1 of the scoping document supplied.
6. Assessments, design, construction and maintenance standards and guidance are available at [TII Publications](#), which replaced the National Road Authority (NRA) Design Manual for Roads and Bridges (DMRB) and the NRA Manual of Contract Documents for Road Works (MCDRW).
7. Environmental Impact Assessment shall include provision for travel planning / mobility management planning, in the interests of sustainable travel policy and protecting national roads capacity.
8. The developer, in conducting Environmental Impact Assessment, should have regard to TII's environment guidelines that deal with assessment and mitigation measures for environmental factors and occurrences. In particular:
  - a. TII's environmental assessment and construction guidelines, including the 'Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes' (NRA 2006).'
  - b. The EIAR should consider the 'Environmental Noise Regulations 2006' (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see 'Guidelines for the Treatment of Noise and Vibration in National Road Schemes' (1<sup>st</sup> Rev., National Roads Authority, 2004)).
9. The EIAR should have regard to previous Environmental Assessment Statements/Reports and conditions and/or modifications imposed by An Bord Pleanála, regarding road schemes in the area. The developer should, in particular, have regard to any potential cumulative impacts.

Notwithstanding, any of the above, the developer should be aware that this list is non-exhaustive, thus site and development specific issues should be addressed in accordance with best practice.

I trust that the above comments are of use in your scoping process.

**Yours sincerely,**

**Andrew Moore**  
Regulatory and Administration Executive



Transport Infrastructure Ireland  
Parkgate Business Centre  
Parkgate Street  
Dublin D08 DK10

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Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag <http://www.tii.ie/about/>

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