



APPENDIX 2-1

SCOPING RESPONSES

David Naughton

From: Environmental Co-ordination (Inbox) <Environmental_Co-ordination@agriculture.gov.ie>
Sent: Wednesday 27 October 2021 08:56
To: David Naughton
Subject: FW: 210414 - Scoping Document for Proposed Mixed Use Development at Moygaddy, Co. Meath

Good Morning David

Further to my email below, I wish to inform you that the Department of Agriculture, Food & the Marine has no observations on the scoping document for the proposed development at this time.

Kind regards

Cathy Hewitt

Executive Officer

An tAonad um Chomhordú Timpeallachta, An Rannóg um Athrú Aeráide agus Beartas Bithfhuinnimh, Environmental Co-ordination Unit | Climate Change & Bioenergy Policy Division |

An Roinn Talmhaíochta, Bia agus Mara

Department of Agriculture, Food and the Marine

Pailliún A, Páirc Gnó Grattan, Bóthar Átha Cliath, Port Laoise, Co Laoise, R32 K857

Pavilion A, Grattan Business Park, Dublin Road, Portlaoise, Co Laois, R32 K857

T +353 (0)57 868 9915 environmentalco-ordination@agriculture.gov.ie

www.agriculture.gov.ie

From: Environmental Co-ordination (Inbox)
Sent: Friday 22 October 2021 08:34
To: 'dnaughton@mkoireland.ie' <dnaughton@mkoireland.ie>
Cc: Hennebry, Breeda <Breeda.Hennebry@agriculture.gov.ie>
Subject: RE: 210414 - Scoping Document for Proposed Mixed Use Development at Moygaddy, Co. Meath

Good Morning David

I have received your query below. Upon checking it would appear that we did not receive your original request for comments on the 9th August. The email you used was incorrect (there is an underscore excluded). However, I will forward the documents to the relevant sections and ask them to revert with any obs they may have ASAP.

Kind regards

Cathy Hewitt

Executive Officer

An tAonad um Chomhordú Timpeallachta, An Rannóg um Athrú Aeráide agus Beartas Bithfhuinnimh, Environmental Co-ordination Unit | Climate Change & Bioenergy Policy Division |

An Roinn Talmhaíochta, Bia agus Mara

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Pailliún A, Páirc Gnó Grattan, Bóthar Átha Cliath, Port Laoise, Co Laoise, R32 K857

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www.agriculture.gov.ie

From: McGoldrick, David
Sent: Thursday 21 October 2021 16:48
To: Environmental Co-ordination (Inbox)
Subject: FW: 210414 - Scoping Document for Proposed Mixed Use Development at Moygaddy, Co. Meath

Hello,

Please see query below. Thanks.

David

From: David Naughton <dnaughton@mkoireland.ie>

Sent: 20 October 2021 16:24

To: Info@agriculture.gov.ie

Subject: FW: 210414 - Scoping Document for Proposed Mixed Use Development at Moygaddy, Co. Meath

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Dear Sir or Madam,

Just following up on the below to see if the department has any comments or recommendations on the proposed project.

Kind regards,



David Naughton B.Sc. (Env.)

Environmental Scientist

MKO

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From: David Naughton

Sent: Monday 9 August 2021 15:11

To: environmentalco-ordination@agriculture.ie

Subject: 210414 - Scoping Document for Proposed Mixed Use Development at Moygaddy, Co. Meath

Dear Sir or Madam,

Please find attached a cover letter and Scoping Document for a proposed mixed use development in Moygaddy, Co. Meath. The site is located just north of Maynooth town.

As part of the scoping exercise for the proposed development, we would welcome any comments in relation to the proposed project.

If you have any queries, please do not hesitate to contact me.

Kind regards,



David Naughton B.Sc. (Env.)

Environmental Scientist

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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.

Emily Lynch

From: CorporateSupport.Unit <CorporateSupport.Unit@decc.gov.ie>
Sent: 27 August 2021 15:21
To: David Naughton
Cc: CorporateSupport.Unit
Subject: Reply from DECC re EIS 21/ 297 Proposed Mixed Use Development at Moygaddy, Co. Meath
Attachments: GSI datasets relevant to EIA & SEA_20210421.pdf; 21_297 Proposed Mixed Use Development at Moygaddy Co. Meath.pdf; 20210809 Frm MKO re DECC cover letter ref 210414.pdf

Good afternoon,

Please see attached and below a reply from Ms. Trish Smullen and Dr Clare Glanville (Senior Geologist) on behalf of Geological Survey Ireland, (a division of the Department of Environment, Climate and Communications) for the subject below.

Please forward an acknowledgment of receipt to CorporateSupport.Unit@decc.gov.ie at your earliest convenience. I have attached your letter of 09/08/2021 for reference.

Regards,
Enda Brady,
Corporate Support Unit,
Department of Environment, Climate and Communications.

From: GSI Planning
Sent: 27 August 2021 13:52
To: CorporateSupport.Unit
Cc: Clare Glanville; GSI Planning
Subject: Re: EIS 21/ 297 Proposed Mixed Use Development at Moygaddy, Co. Meath

Hi Enda,
Please see attached for return to MKO.
Thanks and regards,
Trish

From: GSI Planning
Sent: 10 August 2021 10:14
Cc: GSI Planning
Subject: EIS 21/ 297 Proposed Mixed Use Development at Moygaddy, Co. Meath

EIS 21/ 297 Proposed Mixed Use Development at Moygaddy, Co. Meath.

Request for observations by MKO for direct reply. Scoping document attached.

Regards,
Trish

Emily Lynch

From: CorporateSupport.Unit <CorporateSupport.Unit@decc.gov.ie>
Sent: 21 October 2021 10:34
To: David Naughton
Cc: CorporateSupport.Unit
Subject: RE: 210414 - Scoping Document for Proposed Mixed Use Development at Moygaddy, Co. Meath

Good morning David,

Corporate Support Unit have forwarded two replies to you on 16/08/2021 (Inland Fisheries Ireland) and 27/08/2021 (Geological Survey Ireland). I have circulated the reminder below to the other appropriate contacts and asked for a reply (if any) before the end of this month. If there are any observations I will forward these to you.

Regards,
Enda Brady,
Corporate Support Unit,
Department of Environment, Climate and Communications.
087 623 7714

From: David Naughton [mailto:dnaughton@mkoireland.ie]
Sent: 19 October 2021 16:14
To: CorporateSupport.Unit
Cc: CorporateSupport.Unit
Subject: RE: 210414 - Scoping Document for Proposed Mixed Use Development at Moygaddy, Co. Meath

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Dear Sir or Madam,

Just following up on the below to see if the department has any comments or recommendations on the proposed project.

Kind regards,



David Naughton B.Sc. (Env.)
Environmental Scientist

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Mr. David Naughton BSc
MKO,
Tuam Road,
Galway
H91VW84
1st September 2021

Re: 210414 - Scoping Document for Proposed Mixed Use Development at Moygaddy, Co. Meath

Dear David,

The Department of Transport would like the following to be taken into consideration in relation to the proposed mixed use development at Moygaddy, Co. Meath

Given the proximity of the Moygaddy sites to the Royal Canal Greenway and NTA plans for additional cycling and pedestrian facilities within Maynooth, it will be vital that the masterplan being developed includes significant provision for cycling and pedestrian access from the sites to Maynooth train station, the University and the Royal Canal Greenway and also significant provision for cycle parking within the sites.

Yours sincerely,

Jacqui Traynor

Reform Communications Emergency Planning

An Roinn Iompair

Department of Transport

Lána Líosain, Baile Átha Cliath, D02 TR60

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Jacquitraylor@transport.gov.ie www.gov.ie/transport

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David Naughton

From: planning applications <planning.applications@failteireland.ie>
Sent: Thursday 19 August 2021 11:48
To: David Naughton
Subject: RE: 210414 - Scoping Document for Proposed Mixed Use Development at Moygaddy, Co. Meath
Attachments: Fáilte Ireland EIAR Guidelines.pdf

Hello David,

Thank you for your email regarding the scoping document for the proposed Mixed Use Development at Moygaddy, Co. Meath

Please see attached the updated copy of Fáilte Ireland's Guidelines for the Treatment of Tourism in an EIA, which you may find informative for the preparation of the Environmental Impact Assessment for the proposed project. 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.

Regards,

Yvonne

Yvonne Jackson

Product Development-Environment & Planning Support | Fáilte Ireland
Áras Fáilte, 88/95 Amiens Street, Dublin 1. D01WR86
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From: David Naughton <dnaughton@mkoireland.ie>
Sent: Monday 9 August 2021 16:16
To: planning applications <planning.applications@failteireland.ie>
Subject: 210414 - Scoping Document for Proposed Mixed Use Development at Moygaddy, Co. Meath

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Dear Sir or Madam,

Please find attached a cover letter and Scoping Document for a proposed mixed use development in Moygaddy, Co. Meath. The site is located just north of Maynooth town.

As part of the scoping exercise for the proposed development, we would welcome any comments in relation to the proposed project.

If you have any queries, please do not hesitate to contact me.

Kind regards,



David Naughton B.Sc. (Env.)
Environmental Scientist

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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.

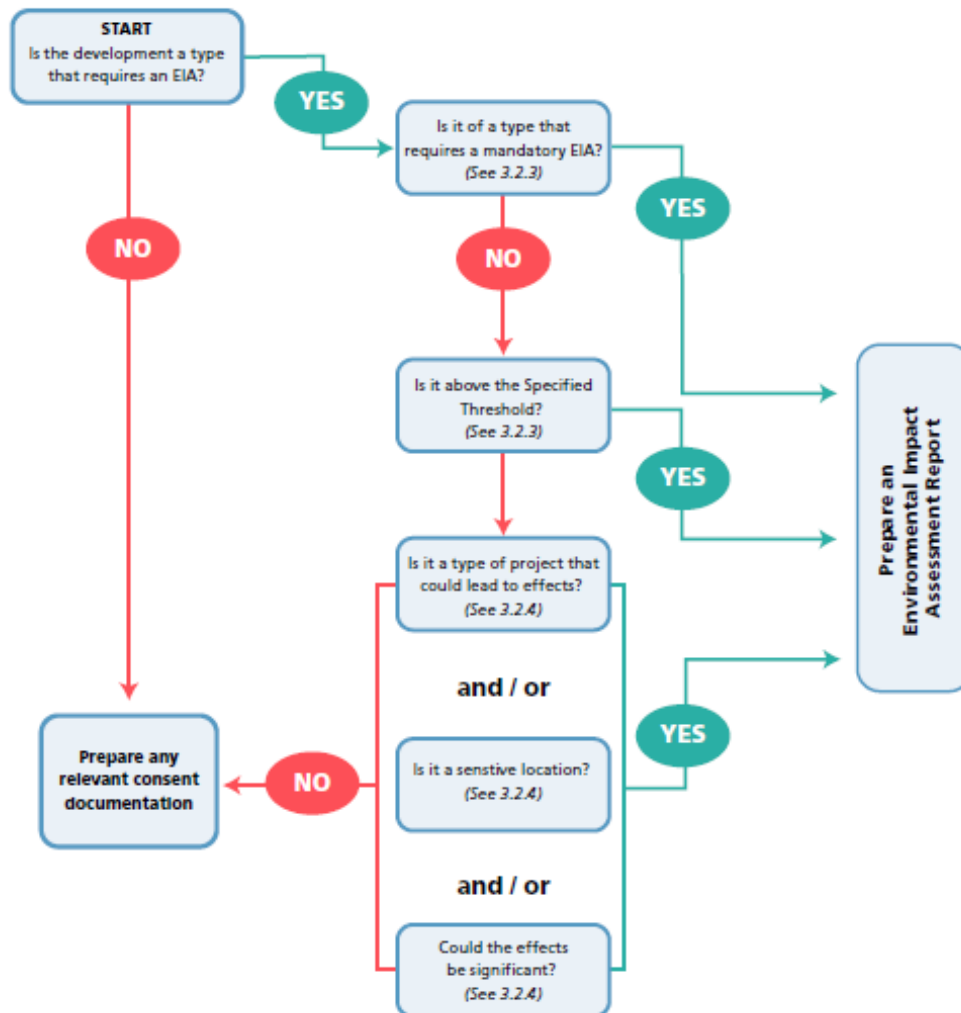
Screening

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.



David Naughton
MKO
Tuam Road
Galway
H91 VW84

27 August 2021

Re: Proposed Mixed Use Development at Moygaddy Co. Meath
Your Ref: 210414
Our Ref: 21/297

Dear David,

Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and advice and gather various data for that purpose. Please see our [website](#) for data availability. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

With reference to your letter dated 09 August 2021, concerning the proposed Mixed Use Development at Moygaddy Co. Meath, Geological Survey Ireland would encourage use of and reference to our datasets. Please find attached a list of our publicly available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment. The remainder of this letter and following sections provide more detail on some of these datasets.

Geoheritage

Geological Survey Ireland is in partnership with the National Parks and Wildlife Service (NPWS, Department of Housing, Local Government and Heritage), 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 Geoheritage Programme of Geological Survey Ireland, 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 (CGSs), as adopted under the National Heritage Plan, include additional sites that may also be of national importance, but which were not selected as the very best examples for NHA designation. All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS. CGSs are now routinely 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. Meath was carried out in 2007. The full report details can be found at [The Geological Heritage of Meath](#). **Our records show that there are no CGSs in the vicinity of the proposed mix use development.**

Groundwater

Geological Survey Ireland's [Groundwater and Geothermal Unit](#), provides advice, data and maps relating to groundwater distribution, quality and use, which is especially relevant for safe and secure drinking water supplies and healthy ecosystems.

Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our [Map viewer](#) which should include: wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps.



For areas underlain by limestone, please refer to the karst specific data layers (karst features, tracer test database; turlough water levels (gwlevel.ie). Background information is also provided in the Groundwater Body Descriptions. Please read all disclaimers carefully when using Geological Survey Ireland data.

The Groundwater Data Viewer indicates a ‘Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones’ underlies the proposed development. The Groundwater Vulnerability map indicates a range of groundwater vulnerabilities within the vicinity of the proposed development. 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 assessments, as any groundwater-surface water interactions that might occur would be greatest in these areas.

[GWClimate](#) is a groundwater monitoring and modelling project that aims to investigate the impact of climate change on groundwater in Ireland. This is a follow on from a previous project (GWFlood) and the data may be useful in relation to Flood Risk Assessment (FRA) and management plans. Maps and data are available on the [Map viewer](#).

The Groundwater Protection Response overview and link to the main report is here: <https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/projects/protecting-drinking-water/what-is-drinking-water-protection/county-groundwater-protection-schemes/Pages/default.aspx>.

Geological Mapping

Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible. We would encourage you to use these data which can be found [here](#), in your future assessments.

Geotechnical Database Resources

Geological Survey Ireland continues to populate and develop our national geotechnical database and viewer with site investigation data submitted voluntarily by industry. The current database holding is over 7500 reports with 134,000 boreholes; 31,000 of which are digitised which can be accessed through downloads from our [Geotechnical Map Viewer](#). We would encourage the use of this database as part of any baseline geological assessment of the proposed development as it can provide invaluable baseline data for the region or vicinity of proposed development areas. This information may be beneficial and cost saving for any site-specific investigations that may be designed as part of the project.

Natural Resources (Minerals/Aggregates)

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 we would recommend use of our data and mapping viewers to identify and ensure that natural resources used in the proposed development are sustainably sourced from properly recognised and licensed facilities, and that consideration of future resource sterilization is considered.

Geochemistry of soils, surface waters and sediments

Geological Survey Ireland provides baseline geochemistry data for Ireland as part of the Tellus programme. Baseline geochemistry data can be used to assess the chemical status of soil and water at a regional scale and to support the assessment of existing or potential impacts of human activity on environmental chemical quality. Tellus is a national-scale mapping programme which provides multi-element data for shallow soil, stream sediment and stream water in Ireland. At present, mapping consists of the border, western and midland regions. Data is available at <https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx>. This page also hosts Geochemical Mapping of Agricultural and Grazing Land Soil of Europe (GEMAS) and litho-geochemistry (rock geochemistry) from southeast Ireland datasets.



Geological Survey Ireland and partners are undertaking applied geochemistry projects to provide data for agriculture ([Terra Soil](#)), waste soil characterisation ([Geochemically Appropriate Levels for Soil Recovery Facilities](#)) and mineral exploration ([Mineral Prospectivity Mapping](#)).

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 geoh heritage dataset, if appropriate. Alternatively, we ask that a digital photographic record of significant new excavations could be provided. Potential visits from Geological Survey Ireland 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, Geological Mapping Unit, at 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 Clare Glanville, or my colleague Trish Smullen at GSIPlanning@gsi.ie.

Yours sincerely,

Clare Glanville
Senior Geologist
Geological Survey Ireland

Enc: Table - Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes.

Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes
following European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018
(S.I. No. 296 of 2018)

Geological Survey Ireland Programme	Dataset	Relevant EIA Topic	Coverage	Description / Notes	Link to Geological Survey Ireland map viewer
Geohazards	Landslide: National landslide database and landslide susceptibility map	Land & Soil/Climate/Landscape	National	Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=b68cf1e4a9044a5981f950e9b9c5625c
Geohazards	Groundwater Flooding (Historic)	Water	Regional	Provide information of historic flooding, both surface water and groundwater. [A lack of flooding presented in any specific location of the map only indicates that a flood has not been detected. It does not indicate that a flood cannot occur in that location at present or in the future]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc
Geohazards	Groundwater Flooding (Predictive)	Water	Regional	Provides information on the probability of future karst groundwater flooding (where available). [The maps do not, and are not intended to, constitute advice. Professional or specialist advice should be sought before taking, or refraining from, any action on the basis of the flood maps]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc
Geohazards	Radon Map	Land & Soils/Air	National		http://www.epa.ie/radiation/radonmap/
Geoheritage	County Geological Sites as adopted by National Heritage Plan and listed in County Development Plans	Land & Soils/Landscape	Regional	All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS.	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0b2fbd2aaac3c228
Geological Mapping	Bedrock geology:	Land & Soils	National	1:100,000 scale and associated memoirs.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea91067e1b6ab8d58&scale=0
Geological Mapping	Bedrock geology:	Land & Soils	Regional	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea91067e1b6ab8d58&scale=0
Geological Mapping	Quaternary geology: Sediments	Land & Soils	National	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea91067e1b6ab8d58&scale=0
Geological Mapping	Quaternary geology: Geomorphology	Land & Soils	National	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea91067e1b6ab8d58&scale=0
Geological Mapping	Physiographic units:	Land & Soils	National	Broad-scale physical landscape units mapped at 1:100,000 scale in order to be represented as a cartographic digital map at 1:250,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=afa76a420f54877843aca1bc075c62b
Geological Mapping	GeoUrban: Spatial geological data for the greater Dublin and Cork areas	Land & Soils	Regional	Includes 3D models	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9768f4818b794c6093beb2212a850ce6&scale=0
Geological Mapping	Geotechnical database	Land & Soils	National	Digitised geotechnical and Site Investigation Reports and boreholes which can be accessed through online downloads	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=a2718be1873d47a585a3f0415b4a724c
Goldmine	Historical data sets including geological memoirs and 6" to 1 mile geological mapping records	Land & Soils/Water	National	available online	https://secure.dcaa.gov.ie/goldmine/index.html
Groundwater & Geothermal	Groundwater resources (aquifers)	Water	National	Data limited to 1:100,000 scale; sites should be investigated at local scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater recharge.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale; long term annual average recharge	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater vulnerability.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Group scheme and public supply source protection areas.	Water	National	Not all PWS / GWS have SPZ / ZOC. Check with IW / coco / NFGWS for private supplies.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater Protection Schemes	Water	National	Data is limited to scale of 1:40,000. Data does not include all of the source protection areas	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Catchment and WFD management units.	Water	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	karst specific data layers	water	National	For areas underlain by limestone, includes karst features, tracer test database; turf/lough water levels (gwlevel.ie)	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Wells and Springs	Water	National	Not comprehensive, there may be unrecorded wells and springs	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater body Descriptions	Water	National	Not exhaustive; only those in designated SACs; could be other GWDTEs; for more information contact NPWS / EPA / site investigations Also, Roadmap for a Policy and Regulatory Framework for Geothermal Energy, November 2020	https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/understanding-ireland-groundwater/Pages/Groundwater-bodies.aspx
Groundwater & Geothermal	Geothermal Suitability maps	Land & Soils/Water	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9eae46bee08de41278b90a9916d0c0b9e
Marine & Coastal Unit	INFOMAR - Ireland's national marine mapping programme; providing key baseline data for Ireland's	Water	National		https://secure.dcaa.gov.ie/GSI/INFOMAR_VIEWER/
Marine & Coastal Unit	CHERISH - Coastal change project (Climate, Heritage and Environments of Reefs, Islands, and Headlands)	Water	Regional		http://www.cherishproject.eu/en/
Marine & Coastal Unit	Coastal Vulnerability Index (CVI).	water / Land & Soils	Regional	Currently the project is being carried out on the east coast and will be rolled out nationally	https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-Index.aspx
Minerals	Aggregate potential	Land & Soils/Material Assets	National	Consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956
Minerals	Active quarries	Land & Soils	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956
Minerals	Historic mines	Land & Soils/Cultural Heritage	National	Inventory and Risk Classification 2009. Environmental Protection Agency, Economic Minerals Division and Geological Survey Ireland (DECC).	https://gis.epa.ie/EPAMaps/default?zesting=7&northing=7&lid=EPA:LEMA_Facilities_Extractive_Facilities https://www.epa.ie/enforcement/mines/
Tellus	Geochemical data: multi-element data for shallow soil, stream sediment and stream water	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754
Tellus	Airborne geophysical data including radiometrics, electromagnetics and magnetics	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754
Tellus	urban geochemistry mapping (Dublin SURGE project).	Land & Soils	Regional		https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754

Notes:

1. The maps and data listed above are available on the Geological Survey Ireland map viewer <https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx>
2. Please read all disclaimers carefully when using Geological Survey Ireland data
3. Geological Survey Ireland and Irish Concrete Federation published guidelines for the treatment of geological heritage in the extractive industry in 2008.



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

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E: meath.peho@hse.ie

MKO Consultants
Tuam Rd
Galway
Ireland
H91 VW84

9th September 2021

Re: HSE SCOPING SUBMISSION REPORT

Dear Sir/Madam,

Please find enclosed the HSE consultation report in relation to the above proposal. The following HSE departments were notified of the consultation request for this development on 11th August 2021.

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher/Helen Mulcahy
- CHO – Des O’Flynn

This report only comments on Environmental Health impacts of the scoping request. If you have any queries regarding this report the contact is Ms Elish O’Reilly, Principal Environmental Health Officer, Co. Clinic, Navan, Co. Meath.

Yours sincerely,

A handwritten signature in black ink that reads "Elish O'Reilly".

Principal Environmental Health Officer



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Health Department
County Clinic
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HSE EIS SCOPING REPORT

Environmental Health Service Consultation Report
(as a Statutory Consultee (Planning and Development Acts 2000,
& Regs made thereunder).

Date: 9th September 2021

Type of consultation: Scoping

Planning Authority: An Bord Pleanála

EHIS Reference: 1908

Applicant: Skycastle Ltd

Proposed Development: Development of site at Moygaddy, Maynooth, Co. Meath. The subject site is comprised of four main parcels of land including; residential units, an office/ tech business park, community infrastructure including a nursing home, primary care centre and public hospital and tourism and amenity centre, including a hotel, retail, sport and leisure facilities and a cultural heritage centre. It is envisaged that the Proposed Development will consist of six to eight separate planning applications for the different aspects of the proposed Moygaddy development. The EIAR will cumulatively assess all elements of the Proposed Development and will be submitted alongside the lodgement of the first planning application for Moygaddy, which is likely to be the nursing home and primary care centre elements of the Proposed Development.

This report only comments on Environmental Health impacts of the proposed development. We have made observations on the following specific areas:

Description of the Project:

The EIAR must fully describe the existing physical environment and detail any potential impacts on the existing environment both during the construction and operational phase of the project.

The design characteristics of the project and the reasons for proposing same should be outlined. It is recommended a diverse variety of household types is provided in the residential development to offer people a range of lifestyle, affordability and lifestage choices. All residential development should incorporate the 'Universal Design' Principle to ensure the housing can meet the needs of the occupants regardless of their age, size, ability or disability.

It is also recommended that the development proposals are assessed to ensure compliance with the objectives of the Meath County Development Plan 2020 -2026.

Later Consents Required:

Information on any possible future monitoring requirements for the proposed strategic urban development should be included in the EIAR.

Consideration of Alternatives:

The EIAR should fully describe and consider any alternatives to this project. The applicant should outline a rationale for the site selection and the proposed scheme design.

Public Consultation:

The EIAR should describe measures the applicant took to inform the public about the project. Details of feedback from the public regarding the proposal should be included within the EIAR. Public consultation should be a two way process between the applicant and the public. The EIAR should clearly demonstrate how the legitimate concerns of the public have been assessed and evaluated and how the outcome of consultation with the public influenced decision making within the environmental impact assessment.

Construction

The construction phase of the development creates the potential for temporary emissions which may have a negative impact on the environment and on the health of local residents. The applicant should assess the impacts of construction works having particular regard to:

- Waste Management,
- Pest Control Management,

- Dust Impacts,
- Excessive Noise
- Emissions to Surface/Groundwater

All sensitive receptors in the vicinity of construction works should be identified and measures implemented to ensure they are protected. It is also recommended a Site Specific Construction Management Plan is prepared and included in the EIAR.

Drainage

Any natural flood plains or wetlands on or in the vicinity of the site should be identified and measures implemented to ensure they are protected from the development. The impact of the proposed Strategic Urban Development on watercourses/wetlands further downstream should be assessed.

An integrated approach to surface water management should be implemented on the site. It is recommended that green space and nature based solutions are provided for the storage and conveyance of rainwater on site and to improve flood mitigation in line with the principals outlined in the Greater Dublin Strategic Drainage Study (SUDS)¹.

Climate

It is recommended the applicant ensures climate considerations are fully integrated into the planning of the strategic urban development and outlines how the proposed buildings contribute to climate action through their design. Specific measures which conserve energy consumption and reduce carbon emissions should be outlined in the EIAR.

The applicant should assess the vulnerability of the proposed development against the predicted impacts of a warming climate and they should predict and should outline proactive adaptation measures to ensure the long term resilience of the site infrastructure to the impacts of climate change.

Health

Directive 2014/52/EU has an increased requirement to assess potential significant impacts on Population and Human Health. In the experience of the EHS impacts on human health are generally inadequately assessed in EIA in Ireland. It is recommended that the wider determinants of health and wellbeing are considered. Guidance on determinants of health can be found at www.publichealth.ie

The proposed strategic urban development should be explored for any opportunity to promote physical activity and any potential for health gain should be exploited.

¹ <https://www.sdcc.ie/en/download-it/publications/gdsds-new-development.pdf>

It is recommended that measures to promote walking and cycling throughout the development are implemented along with proposals to ensure the connectivity of the site with the wider urban area. Recreational facilities should be provided to cater specifically for the needs of adolescents and the elderly, along with younger children.

Sustainable transport

The impact of traffic from the proposed Strategic Urban Development should be assessed by carrying out a traffic and transport assessment. An assessment of existing sustainable transport facilities and capacity should also be carried out. It is recommended that the applicant outlines a travel plan for the proposed development which will facilitate and promote the use of public or active transport options for residents.

Landscape

Green recreational space is proven to have positive impacts on health, both physical and mental.² The recent global pandemic has highlighted the importance of access to open green space for recreational purposes for the public. The provision of quality, usable, urban green space is of paramount importance as housing design becomes more compact.

The applicant should assess the impact the proposed Strategic Urban Development will have on existing biodiversity in the area. The applicant should also assess the impact of any possible loss of recreational and amenity green area as a result of the proposed development.

It is recommended that green planting is integrated at all opportunities throughout the development to improve the quality of the built environment and the applicant should outline a diverse range of green spaces for the development in the EIAR. The applicant shall also outline proposals to protect and promote biodiversity on the site.

Noise:

The World Health Organisation (WHO) has identified Environmental Noise as an increasing cause of ill health and detrimental effect on health and wellbeing³.

A full and thorough noise survey must be carried out to assess the impact of noise from the proposed Strategic Urban Development on the residents living in the vicinity. Noise

² Urban Green Space Interventions and Health – a review of impacts and effectiveness, WHO,2017
https://www.euro.who.int/_data/assets/pdf_file/0010/337690/FULL-REPORT-for-LLP.pdf

³ http://www.euro.who.int/_data/assets/pdf_file/0008/136466/e94888.pdf

from traffic movements or heavy goods vehicles associated with the operation of the development should also be included in the noise assessment.

It is essential that up to date baseline monitoring is carried out to establish the existing noise environment. All noise sensitive receptors in the vicinity of the facility shall be identified. The selection of noise monitoring locations for background noise is of critical importance in the noise survey, therefore the rationale for choosing the number and the positioning of these should be provided by the applicant.

Once the existing noise environment has been established, the predicted increase in noise from the proposed Strategic Urban Development should then be quantified and assessed. It is this department's opinion that adherence to specified noise limit values does not always protect sensitive receptors from noise nuisance therefore the significance of the predicted change in the noise environment should be fully assessed. It is requested that this information is outlined and displayed clearly in the EIAR.

Sustainable Development

The significance of the impact the new Strategic Urban Development will have on the existing town centre of Maynooth should be examined and assessed in the EIAR. The applicant should demonstrate compliance with the Retail Planning Guidelines 2013⁴ and Retail Design Manual 2012⁵ which promote "*town centre vitality through a sequential approach to planning*".

It is recognised that Maynooth is designated as a strategic development area in the greater Dublin Metropolitan Area. There has already been a large volume of residential development permitted for the Maynooth area. It is imperative that the key infrastructure facilities and amenities currently within the town of Maynooth are examined to ensure the town can sustainably accommodate the proposed increase in residential development.

The cumulative impacts of any other proposed housing developments in the vicinity should also be assessed.



Lisa Maguire
Environmental Health Officer

⁴ <https://www.gov.ie/en/publication/aa2d8-retail-planning-guidelines-april-2012-418-mb/>

⁵ <https://www.gov.ie/en/publication/0b081-retail-design-manual-april-2012/>



**Iascach Intíre Éireann
Inland Fisheries Ireland**

16/08/2021

RE: EIA Scoping Document for the Proposed Mixed-Use Development at Moygaddy, Co. Meath

Inland Fisheries Ireland is responsible for the protection, management and conservation of the inland fisheries resource. "Fisheries" includes all inland fisheries recreational and commercial, sea angling and mollusc fisheries stipulated under the Fisheries Acts, the physical habitat upon which the fishery relies, the facilities and access, the quantity and quality of the water and the plant and animal life on which fish depend for shelter and food and the spawning areas where in fish deposit their eggs. The protective role of IFI relates to all aspects of the aquatic environment and all factors that influence the biotic communities within waters, which in any way relate to the propagation of fish stocks

The following observations and comments are of necessity of a general nature, while they apply to the proposed development in general, IFI request you have particular regard to the following in the proposed development:

The proposed development is located within the River Ryewater catchment, an important salmonid system. The River Rye Water supports a resident population of Brown trout, a migratory population of Sea trout and importantly a healthy population of the Atlantic salmon. Thus, it is vital to note that salmonid waters constraints apply to any development in this area. The Ryewater also supports populations of Freshwater Crayfish and Lamprey (both Habitats Directive Annex II species). It is also an important spawning tributary of the Liffey. The River Liffey itself is exceptional among most rivers in the area in supporting Atlantic salmon (*Salmo salar*, listed under Annex II and V of the EU Habitats Directive) and Sea trout, resident Brown trout (both *Salmo trutta*) and several other fish species. This highlights the sensitivity of local watercourses and the Liffey catchment in general. The river is regarded as a very important fishery.

IFI's policy is to maintain watercourses in their open natural state in order to prevent habitat loss preserve and enhance biological diversity and aid in pollution detection. An undisturbed buffer zone between development area and the Ryeriver bank should be maximised (10m minimum). The Moygaddy stream which runs through the middle of the site should not be altered or diverted and again an undisturbed buffer zone between development area and riverbank should be maximised. Riparian vegetation should be retained in as natural a state as possible at all times while providing open space and recreational amenity for river users. IFI is strongly opposed to any development on floodplain lands.



**Iascach Intíre Éireann
Inland Fisheries Ireland**

An Invasive Species and Biosecurity Plan should be included to treat and manage identified invasive species onsite.

Best practice should be implemented at all times in relation to any activities that may impact on surface water. Any discharges to surface streams present on the site must not impact negatively on the salmonid status of the system. Comprehensive surface water management measures must be implemented at the construction and operational stage to prevent any pollution entering local waterways. As specific details of the construction works at this site are as yet unknown IFI are not in a position to comment further on potential impacts

Consultation between the project team and IFI will be essential in order that a fisheries-sustainable solution is arrived at and incorporated in the final works programme.

Pre-construction baseline data (biotic and abiotic) is essential within the EIA process and IFI would be delighted to contribute any information that may be relevant to the fishery section (fish data can be accessed at <http://wfdfish.ie/>). Potential impacts (likely and significant effects) of the development on the system should be comprehensively assessed and recommendations and mitigation measures should be formulated. The identification of good baseline data across a range of sites, both close to the development and at a distance from the site will allow for comparison between the current situation and that which may develop over time if the project proceeds.

IFI have recently published the following guidelines which should also be referred to in the EIAR. They can be accessed on our website www.fisheriesireland.ie :

Revised "Planning for watercourses in the urban environment" which can provide guidance on site specific measures to enhance, protect, rehabilitate or establish riparian and aquatic habitats.

"River Restoration Works - Science based Guidance centred on Hydromorphological Principles in an Era of Climate Change – 2020" has also been published by IFI and describes a framework to plan, design, implement and monitor river restoration projects. A list of best practice riparian and instream measures are presented alongside measures to address channel connectivity and invasive species that are compliant with the EU Water Framework Directive (WFD), other EU Directives and State regulations.



Iascach Intíre Éireann
Inland Fisheries Ireland

I trust you will take our observations on board when compiling the EIAR.

Kind regards,

Roisin O' Callaghan

Fisheries Environmental Officer
Inland Fisheries Ireland - Dublin
Iascach Intíre Éireann
Inland Fisheries Ireland

Telephone: +353 (01) 8842651

Email: roisin.ocallaghan@fisheriesireland.ie

David Naughton

From: INFO <Information@tii.ie>
Sent: Thursday 23 September 2021 10:18
To: David Naughton
Subject: RE: 210414 - Scoping Document for Proposed Mixed Use Development at Moygaddy, Co. Meath

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Dear Mr. Naughton,

Thank you for your email of 9 August 2021 regarding the above.

TII will endeavour to consider and respond to planning applications referred to it given its status and duties as a statutory consultee under the Planning Acts. The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidelines as outlined in the Section 28 Ministerial Guidelines '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.

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 planning application referred.

With respect to EIAR scoping issues, the recommendations indicated below provide only general guidance for the preparation of an EIAR, which may affect the national road network.

The developer/scheme promoter should have regard, inter alia, to the following:

- TII notes that the subject site accesses the regional/local road network prior to access to the M4, national road, consultations should be had with the relevant Local Authority/National Roads Design Office with regard to locations of existing and future national road schemes,
- 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,
- The developer should assess visual impacts from existing national roads,
- The developer should have regard to any Environmental Impact Statement and all 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,
- The developer, in preparing EIAR, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works),
- The developer, in preparing EIAR, should have regard to 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 (National Roads Authority, 2006),
- The EIAR/EIS 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 (1st Rev., National Roads Authority, 2004)),

- 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. In relation to national roads, TII's Traffic and Transport Assessment 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 NRA/TII TTA Guidelines which addresses requirements for sub-threshold TTA. Any improvements required to facilitate development should be identified. It will be the responsibility of the developer to pay for the costs of any improvements to national roads to facilitate the private development proposed as TII will not be responsible for such costs,
- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required,
- In the interests of maintaining the safety and standard of the national road network, the EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network.
- TII recommends that that applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Where abnormal 'weight' loads are proposed, separate structure approvals/permits and other licences may be required in connection with the proposed haul route and all structures on the haul route through all the relevant County Council administrative areas should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal 'weight' load proposed.

The national road network is managed by a combination of PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities in association with TII. The applicant/developer should also consult with all PPP Companies, MMaRC Contractors and road authorities over which the haul route traverses to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is safeguarded.

Additionally, any damage caused to the pavement on the existing national road arising from any temporary works due to the turning movement of abnormal 'length' loads (e.g., tearing of the surface course, etc.) shall be rectified in accordance with TII Pavement Standards and details in this regard shall be agreed with the Road Authority prior to the commencement of any development on site.

Designers should consult TII Publications to determine whether a Road Safety Audit is required for any of the temporary works proposed. Any recommendations should be incorporated into designs.

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 EIAR preparation.

Yours sincerely,

Alban Mills
Senior Regulatory & Administration Executive
 Ref No. TII21-114295



From: David Naughton <dnaughton@mkoireland.ie>
Sent: Monday 9 August 2021 18:05
To: Landuse Planning <LandUsePlanning@tii.ie>
Subject: 210414 - Scoping Document for Proposed Mixed Use Development at Moygaddy, Co. Meath

CAUTION: This email originated from outside of TII. Do not click links or open attachments unless you recognise the sender and are sure that the content is safe.

Dear Sir or Madam,

Please find attached a cover letter and Scoping Document for a proposed mixed use development in Moygaddy, Co. Meath. The site is located just north of Maynooth town.

As part of the scoping exercise for the proposed development, we would welcome any comments in relation to the proposed project.

If you have any queries, please do not hesitate to contact me.

Kind regards,



David Naughton B.Sc. (Env.)
Environmental Scientist

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