

Appropriate Assessment Screening Report

**(In accordance with the requirements of Article 6(3) of the EU
Habitats Directive**

For

**The Development of an Existing Industrial Site as a
Fire Service Training Centre at Kilmallock Business
Park, Kilmallock, Co. Limerick.**

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1. Introduction

1.1 Background

Under the EU Habitats and Birds Directives, member states are required to designate Special Areas of Conservation (SAC`s) and Special Protected Areas (SPA`s) respectively. These are collectively known as Natura 2000 sites. This Appropriate Assessment screening report provides an ecological assessment for the proposed development of an existing industrial site as a Fire Service Training Centre at Kilmallock Business Park, Kilmallock, Co. Limerick. to determine the potential for significant impacts on nearby Natura 2000 sites. The proposed development is not located within any Natura 2000 site, however, it is located within 10 km of Ballyhora Mountain SAC [002036] and Glen Bog SAC SAC [001430] and within 11km of Blackwater River SAC [002170]

An 'Appropriate Assessment' (AA) is a required assessment to determine the likelihood of significant impacts of any plans or projects on Natura 2000 sites. A screening for AA determines whether a plan or project, either alone or in combination with other plans and projects, is likely to have significant effects on a Natura 2000 site in view of its conservation objectives. The purpose of this assessment is to determine, the appropriateness, or otherwise, of the proposed project in the context of the conservation objectives of Natura 2000 sites.

This screening for AA has been undertaken in accordance with the European Commission Methodological Guidance on the provision of Article 6(3) and 6(4) of the 'Habitats' Directive 92/43/EEC (EC, 2001) and the European Commission Guidance 'Managing Natura 2000 sites' (EC, 2000).

1.2 Legislation

Natura 2000 is an EU wide network of nature protection areas established under the 1992 Habitats Directive. It includes Special Areas of Conservation (SAC) designated under the Habitats Directive and also incorporates Special Protection Areas (SPA) designated under the 1979 Birds Directive. It is the responsibility of each member state to designate SPAs and

cSACs, both of which will form part of the Natura 2000 network of protected sites throughout the European Community.

An Appropriate Assessment is required under Article 6 of the Habitats Directive where a project or plan may give rise to significant effects upon a Natura 2000 Site, and paragraphs 3 and 4 state that: **6(3)** Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public. **6(4)** If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted. Where the site concerned hosts a priority natural habitat type and/or a priority species, the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest. The current assessment was conducted within this legislative framework and also the recent DoEHLG (2009) guidelines.

1.3 The AA Process

The AA process is a four-stage process to complete the AA, with issues and tests at each stage. The outcome at each successive stage determines whether a further stage in the process is required. This proposal has proceeded as far as Stage 1 only. The four stages in the AA process are:

- Stage 1: Screening

The first step to establishing if an appropriate assessment is required is referred to as 'screening' and its purpose is to determine on the basis of a preliminary assessment and objective criteria if the plan, alone or in combination with other plans or projects, could have a significant effect on a Natura 2000 site in view of the sites conservation objectives. The process identifies any likely impacts upon a Natura 2000 site, either alone or in combination with other projects or plans, and considers whether these impacts are likely to be significant.

- Stage 2: Appropriate Assessment

The consideration of the impact of the project or plan on the integrity of the Natura 2000 Site, either alone or in combination with other projects or plans to the site's structure and function and its conservation objectives. A Natura Impact Statement containing a professional scientific examination of the proposal is required and includes any mitigation measure to avoid, reduce or offset negative impacts: Additionally, where there are adverse impacts, an assessment of the potential mitigation of those impacts.

- Stage 3: Alternative Solutions

The process which examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the Natura 2000 site

- Stage 4: Imperative Reasons of Overriding Public Interest

This stage is the main derogation process of Article 6(4) which examines whether there are imperative reasons of overriding public interest (IROPI) for allowing a plan or project which will have adverse effects on the integrity of a Natura 2000 site to proceed.

A Stage 1 screening exercise was undertaken for this project. It's conclusion that significant impacts on Natura 2000 sites will not occur means that further AA stages are not required.

1.4 Assessment Methodologies

The preparation of this report included site visits and desktop study. A desk top research and literature review was carried out to collate available information on the site's natural environment. This comprised a review of the following publications and datasets:

- The Status of EU Protected Habitats and Species in Ireland 2013 (NPWS)

- Environmental Protection Agency (EPA) water quality data;
- Geological Survey Ireland (GSI) area maps;
- National Biodiversity Data Centre (NBDC)
- OSI maps

2. Appropriate Assessment Screening – Stage 1

The screening stage identifies whether a plan or project – either alone or in combination with other plans or projects is likely to have a significant impact on a Natura 2000 site. This stage involves four steps:

1. determining whether the plan/project is directly connected with the management of the site (if it is, then no further assessment is necessary)
2. describing the plan and other plans and projects that ‘in combination’ have the potential to have significant effects on a Natura 2000 site.
3. identifying the potential effects on a Natura 2000 site; and
4. assessing the significance of any effects on a Natura 2000 site.

This screening for AA, or Stage 1 of AA, has been undertaken in accordance with the European Commission Methodological Guidance on the provision of Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC (EC, 2001) and the European Commission Guidance ‘Managing Natura 2000 sites’ (EC, 2000).

2.1 Management of Natura 2000 Site

The proposal is not connected with or necessary to the conservation management of a Natura 2000 site.

2.2 Description of project

The project is to develop the existing industrial site as a Fire Service Training Centre at Kilmallock Business Park, Kilmallock, Co. Limerick. Phase 1 works will include:

- a) The fit-out of existing building (former fire station and Fit for Life Building) to a Fire Service Training Centre lecture building and Administrative Support Building. The works within the existing building will include the subdivision of the building with internal

partitions and the fit-out of showering/ w.c / changing facilities to the rear of the building. There is an existing rollers shutter door to the front of the building that will be replaced by glazing. Existing car parking spaces will be utilised as much as possible.



Fig. 1 Phase 1 Site plan.

b) **Drill yard with two drill towers.** The area of the drill yard will be 5,300 sq.m (1.3 acres). The two drill towers will be constructed of steel and will be 3 storeys high and 12.9 metres in height. Foundations will be required. The yard will be surfaced with tarmac/bitumen

macadam. A 2.4m high fence will be erected around site perimeter. ACO drains will connect to existing foul network.

c) Compartment Fire Behaviour Training complex. The area of ground within the CFBT site slopes from North to South towards the River Loobagh, 955 m³ of fill will be required to raise the level of the site. The finished ground level of the CFBT Site will be 4.5m above the river. The fill material will come from a local authority depot and it will contain the following;

200201 Biodegradable Waste, 200202 Soil and Stones, 200203 Other non-biodegradable wastes, 170107 Mixture of concrete bricks, tiles and ceramics other than those mentioned in 170106, 170504 Soil and Stones other than those mentioned in 170503, 170904 Mixed construction and demolition wastes other than those mentioned in 170901 170902 170903.

The design features a structure 3 containers high and 3 containers wide with 2 additional container to the side of the unit. There will be another storage unit nearby on this site for the storage of dry timber boards. The overall height will be 7.77m.

A 2.4m high mesh fence will be erected around the perimeter of the CFBT site. ACO drains will connect to existing foul network.

The area marked Phase 2 on map below are lands for future development.

2.3 Description of site

The project site is the existing industrial site at Kilmallock Business Park, Kilmallock, Co. Limerick. It is circa 8 acres in size and is a fully serviced undeveloped industrial site with existing industrial units included. There are open undeveloped areas of grassland within the site.

The site is located adjacent to the town of Kilmallock, just off the R51 Kilmallock to Bruree road. The immediate surrounding landscape is predominantly Improved Agricultural Grassland with field boundaries of hedgerows.



Fig.2. Open grassland area within site.

The River Loobagh is located within 50m at the southern boundary of the site and flows from east to west. At the south western corner of the site there is a small patch of grassland with scrub. This scrub is primarily Willow (*Salix sp*) and is a consequence of lack of grazing/mowing. The site is not located within any designated site, it is located within 10 km of Ballyhoura Mountain SAC [002036] and Glen Bog SAC [001430] and within 11km of Blackwater River SAC [002170]

2.4 Identification of Natura 2000 sites

2.4.1 Natura 2000 sites in and within 15km of proposal site

In accordance with NPWS guidance all designated sites within 15km of the proposal location will be identified and characterised in the context of the rationale for designation and qualifying features. Potential impacts associated with the proposed development will be identified before an assessment is made of the likely significance of these impacts upon Natura 200 sites.

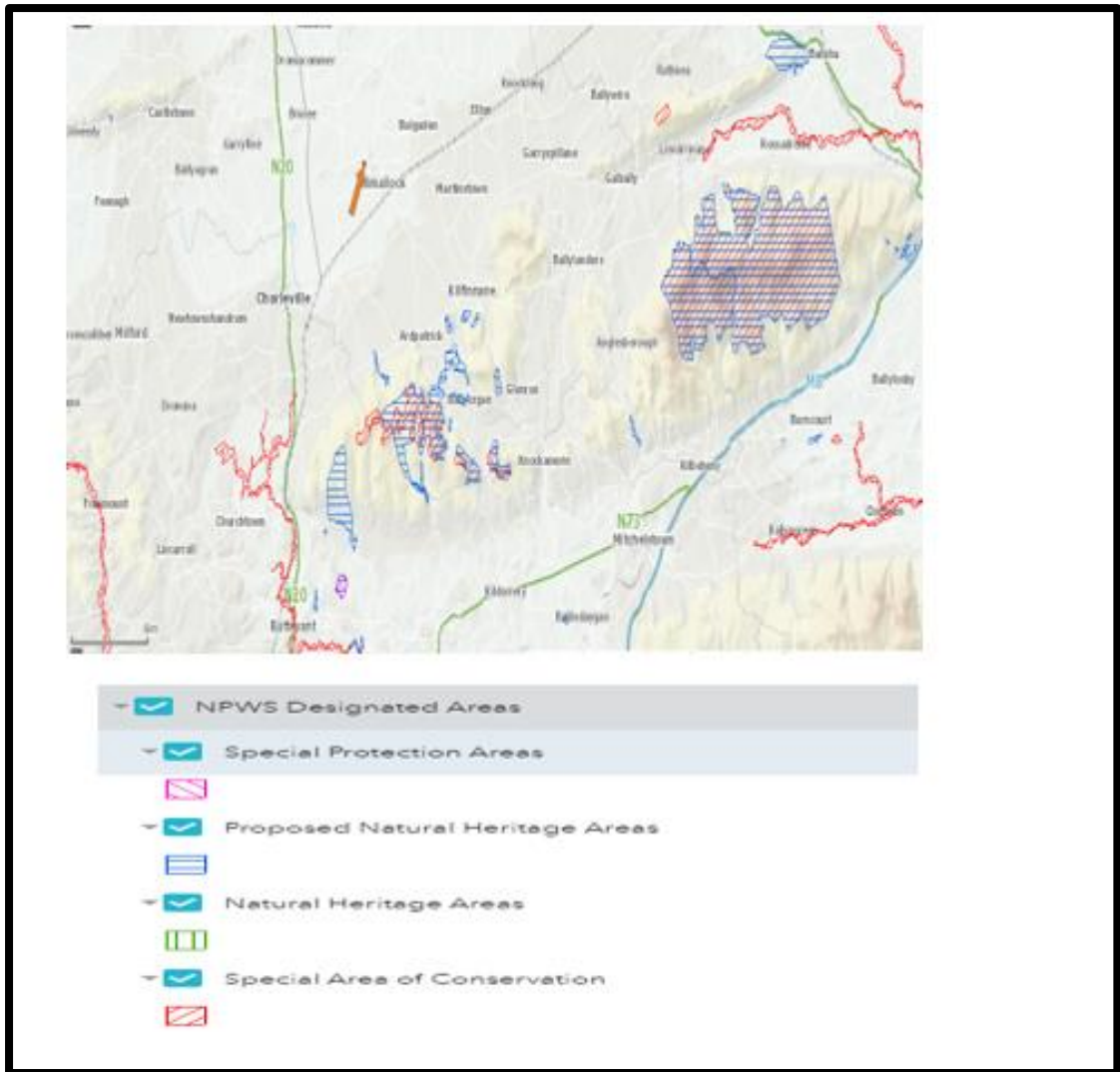


Fig. 3 Site location ➡ in relation to nearest designated sites.

Table 1. Designated conservation sites within a 15km radius of proposed development.

No.	Designated Site	Site Code	Proximity of development to nearest designated site
1.	Ballyhoura Mountain SAC	002036	The proposed development is within 10km of the SAC designated site

2.	Glen Bog SAC	001430	The proposed development is within 10km of the SAC designated site
3.	Blackwater River SAC	002170	Designated site approximately 14 km from the proposed development.

2.4.2 Characteristics of Natura 2000 sites

Table 2, below, lists the Natura 2000 sites that lie within 15km of the proposed development, with their qualifying features and other conservation interests.

Table 2. Designated Sites with qualifying conservation features of interest.

Designated Site	Qualifying Features of Interest
Ballyhoura Mountains SAC 002036	<ul style="list-style-type: none"> • 4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> • 4030 European dry heaths • 7130 Blanket bogs (* if active bog)
Glen Bog SAC 001430	<ul style="list-style-type: none"> • Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, Salicion albae) [91E0]
Blackwater River SAC 002170	<ul style="list-style-type: none"> • Estuaries [1130] • Mudflats and sandflats not covered by seawater at low tide [1140] • Perennial vegetation of stony banks [1220] • Salicornia and other annuals colonising mud and sand [1310] • Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330] • Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410] • Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation [3260] • Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0] • Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, Salicion albae) [91E0]

	<ul style="list-style-type: none"> • Margaritifera margaritifera (Freshwater Pearl Mussel) [1029] • Austropotamobius pallipes (White-clawed Crayfish) [1092] • Petromyzon marinus (Sea Lamprey) [1095] • Lampetra planeri (Brook Lamprey) [1096] • Lampetra fluviatilis (River Lamprey) [1099] • Alosa fallax fallax (Twaité Shad) [1103] • Salmo salar (Salmon) [1106] • Lutra lutra (Otter) [1355] • Trichomanes speciosum (Killarney Fern) [1421]
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2.4.3 Conservation Objectives of Natura 2000 sites

The overall aim of the Habitats Directive is to maintain or restore the favourable conservation status of habitats and species of community interest. These habitats and species are listed in The Habitats and Birds Directives and Special Areas of Conservation and Special Protection Areas are designated to afford protection to the most vulnerable of them. These two designations are collectively known as the Natura 2000 network.

There are conservation objectives for all SAC and SPA sites. These conservation objectives are of a wide-ranging nature and most of the conservation objectives developed by the NPWS for Natura 2000 sites are adapted from these and are published on-line as ‘Generic Conservation Objective’ documents. Site specific conservation objectives document have been developed for the Blackwater River SAC, Glen Bog Sac and the Ballyhoura Mountains SAC These comprehensive documents are available online at www.npws.ie

2.5 Identification of Potential Impacts

Potential impacts of the development on Natura 2000 sites are identified in this section. The identified Natura 2000 sites include the Ballyhoura Mountains SAC (SAC site code 002036), The River Blackwater SAC (SAC site code 002170) and Glen Bog SAC (SAC site code 001430). Only those features of the development that have the potential to impact on qualifying features, conservation interests and conservation objectives of the identified Natura 2000 sites are considered. Potential impacts are identified in Table 3 below.

Table 3. Identification of potential impacts.

<p><i>Description of elements of the project likely to give rise to impacts on Natura 2000 sites.</i></p>	<ul style="list-style-type: none"> • Excavation and site works requiring use of heavy machinery. • Introduction of alien invasive species onto site, which could then be spread along River Loobagh downstream.
<p><i>Describe any likely direct, indirect or secondary impacts of the project (either alone or in combination with other plans or projects) on Natura 2000 sites by virtue of:</i></p> <ul style="list-style-type: none"> • <i>Size and scale;</i> • <i>Land-take;</i> • <i>Distance from Natura 2000 Site or key features of the Site;</i> • <i>Resource requirements;</i> • <i>Emissions;</i> • <i>Excavation requirements;</i> • <i>Transportation requirements;</i> • <i>Duration of construction, operation etc.; and</i> • <i>Other.</i> 	<ul style="list-style-type: none"> • The project site is not within any designated site so there are no land take issues. • There will be a minimal emission of smoke during training days when fires are required, Distance from the nearest SAC sites is 10km so risk is minimal. • The project will involve minimal construction works. The proposed works will entail minimal excavation and regrading works. No deep or complex excavations are required that are likely to affect groundwater. • Fill material will be brought onsite from Local Authority Depot and will have been screened to ensure no invasive species are present i.e Japanese Knotweed.

<p><i>Describe any likely changes to the site arising as a result of:</i></p> <ul style="list-style-type: none"> • <i>Reduction of habitat area;</i> • <i>Disturbance of key species;</i> • <i>Habitat or species fragmentation;</i> • <i>Reduction in species density;</i> • <i>Changes in key indicators of conservation value; and</i> • <i>Climate change.</i> 	<ul style="list-style-type: none"> • There will be no reduction of habitat area as the proposed development is not within any designated site. • It is not expected that any of the other effects listed will result from the proposed scheme; nor is it expected that any negative impact on the conservation objectives of any designated site will ensue
<p><i>Describe any likely impacts on the Natura 2000 site as a whole in terms of:</i></p> <ul style="list-style-type: none"> • <i>Interference with the Key relationships that define the structure of the site; and</i> • <i>Interference with key relationships that define the function of the site.</i> 	<ul style="list-style-type: none"> • It is not expected that interference will occur with the key relationships and features of conservation interest that define the structure of any Natura 2000 site. • It is not expected that interference will occur with key relationships and features of conservation interest that define the function of the site

2.6 Assessment of Significance of Potential Impacts

An assessment has been carried out of the potential for any significant effects of the proposed plan on each of the designated Natura 2000 sites identified in section 2.4. This assessment determines the effects of the proposed plan on the Natura 2000 sites.

The potential for significant impacts arising from the proposal was determined based on a number of indicators including:

- Habitat loss;
- Habitat alteration;
- Water quality and resource;
- Disturbance and/or displacement of species; and
- Habitat or species fragmentation.
- Invasive species

2.6.1 Habitat Loss and Alteration

The proposed development is not within any designated site and consequently there will be no resulting loss in habitat or alteration of habitat within any designated site.

2.6.2 Water Quality

The proposed development is approximately 10km from the nearest boundary of the Ballyhoura Mountains SAC and Glen Bog SAC. And 11km from the River Blackwater SAC. The River Loobagh is within 50m to the south of the proposed site, however it is not designated as SAC or SPA. Using EPA Appropriate Assessment maps and tools, the water flow direction of the River Loobagh and associated networks was followed and there is no hydrological connection from the project site to the identified SAC sites via the River Loobagh.

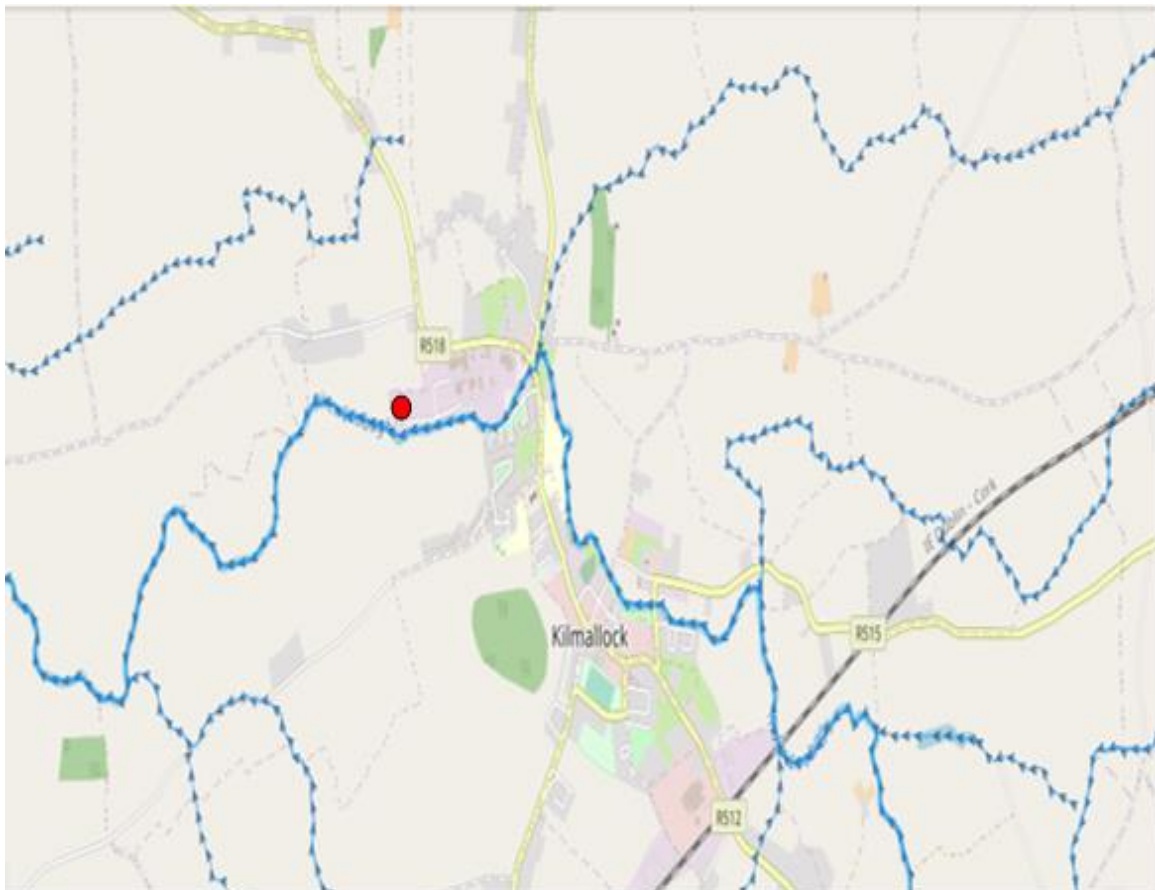


Fig.4 Water flow direction of River network from proposed site 

The water quality of the River Loobagh has been classified as Good (EPA- River waterbody WFD Status 2013-2018). The project is fully serviced with foul/storm water drainage and new

drains will connect to existing network. No negative impacts on the water quality of the River Loobagh are envisaged from the proposed development.

Therefore, it is objectively concluded that no significant impacts on the conservation objectives of the relevant designated sites, by means of adverse water quality impacts, are reasonably foreseeable as a result of the proposal considered in this report.

2.6.3 Disturbance and/or displacement of species

The proposed development is not within any designated site and consequently there will be no disturbance and/or displacement of species. Therefore it is objectively concluded that there will be no significant disturbance or displacement impacts on any of the species listed under the qualifying features of interest for the designated sites highlighted.

2.6.4 Invasive Species

Fill material will be brought onsite from Local Authority Depot and will have been screened to ensure no invasive species are present i.e Japanese Knotweed. This is not a Natura 200 issue but is of local ecological importance. This is dealt with in the accompanying Ecological Impact Assessment report.

2.6.4 Cumulative impact

The EC (2001) guidelines on the provision of Article 6 of the Habitats' Directive state that the phrase 'in combination with other plans or projects' in Article 3(3) of the Habitats Directive refers to the cumulative impacts due to plans or projects 'that are currently under consideration together with the effects of any existing or proposed projects or plans.' A cumulative impact arises from incremental changes caused by other past, present or reasonably foreseeable actions together with the proposed development.

In the absence of any direct or indirect impacts arising from the proposed development at Kilmallock Business Park, Kilmallock, Co. Limerick which could result in adverse impacts on any Natura 2000 site it is concluded that there is no potential for cumulative impacts between the proposal and any other activities in the region.

2.7 Conclusion of screening stage

In conclusion, to determine the potential impacts, if any, of the proposed works that are required to complete the project at Kilmallock Business Park, Kilmallock, Co. Limerick, on

nearby Natura 2000 sites, a screening process for Appropriate Assessment was undertaken. The project site is not within any designated site and the development has no hydrological connection with any of the SACs within 15km and so no impact on the Natura 2000 network is likely.

In conclusion therefore, the project does not require Stage 2 Appropriate Assessment at this juncture.

3. References

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