



Forestry, Ecology & Environment

# Environmental Impact Assessment (EIA) Screening Report

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Share Community Facilities Project at Keel Beach  
Keel, Co. Mayo

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Compiled by Veon Ecology,  
Molly Penzes MSc

Completion Date: 3<sup>rd</sup> February 2023



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Veon Ltd. Veon Ecology							
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<b>Describe scope of contribution in preparing this EIA Screening Report</b>	Desktop Survey, Screening, and Ecological Assessment and report Finalisation.

# Section 1: INTRODUCTION

## 1.1 Purpose of the Report

Veon Ltd. (Veon Ecology) has been appointed to carry out an Environmental Impact Assessment (EIA) Screening Report for a proposed development of a shared community facilities project at Keel Beach located at Keel, Co. Mayo within the Keel east townland. The proposed work is presented in **Figures 1-5**.

The proposed development comprises of both indoor and outdoor heated (through solar power) showers, serviced toilets, and both internal and external seating. It also comprises of communications workspace, which will be multi-functional, multi-media education and learning area for any visitors to the proposed facilities. This proposed development also includes lockers for storage and washdown areas.

The information provided in this report will allow An Bord Pleanála, as the competent authority, in view of best scientific knowledge, if the proposed development, will require an Environmental Impact Assessment Report (EIAR). This report will undertake an EIA Screening assessment and advise if an EIAR is required under current legislation.

A Screening for the EIAR for the proposed project has been prepared and is provided in **Section 8**. The screening assessment concluded as follows:

*It can be concluded beyond reasonable scientific doubt, in view of best scientific knowledge on the basis of the objective information and the European Directive and the Planning and Development Regulation 2001, that an Environmental Impact Assessment Report (EIAR) is not required based on the proposed project being considered a 'sub-threshold development'.*

## 1.2 Proposed Project

The proposed development site is located at Keel Beach, Keel, County Mayo, within the townland of Keel east. The Lat/Long coordinates for the proposed development site are Lat: 53.974082°, -10.074423° (**Location Map, Figures 1 – 5**). The proposed development is for a shared community facility at Keel Beach, Keel, Co. Mayo.

The proposed development site is located at an existing caravan and camping park located at Keel Beach. The site is approximately 700m east of the village of Keel, Co. Mayo. The proposed development site is located directly adjacent to the Keel Machair/Menaun Cliffs SAC (001513) and approximately 7.37km from the Doogort Machair SPA (004235).

The development site for the proposed project is centred at Grid Reference F 63955 04741, the adjoining lands are currently used for recreation and tourism including Keel Beach, and Achill Island Golf Club located to the east of the proposed development site. There are several residential developments and small businesses within the vicinity of the proposed project area as well as agricultural lands. There are no Annex I habitats within the proposed project boundary but there are Annex I habitats in the surrounding lands. Surrounding the proposed project area is the Annex I habitat of Machair. Located south of the proposed project area is the Annex I habitat of Blanket bogs, Alpine & Boreal Heaths. Located south and east of the proposed project area is the Annex I habitat of Fixed Dunes (grey dunes). A small area of Blanket bogs occurs to the southwest of the proposed project area. Located south and southwest of the proposed project area includes occurrences of Marram dunes (white dunes). The soil within the proposed project area and surrounding lands are beach sand and gravels. The site is located over a poor aquifer – bedrock which is generally unproductive except for local zones. The ground waterbody Water Framework Directive (WFD) status 2016 – 2021 is listed as 'Good'.

There are no watercourses within the proposed project area. Approximately 170m west of the proposed development area there is a drainage channel which flows from the north and enters the bay located south of the proposed project area. This drainage channel has the River Waterbody Code of IE\_WE\_33K020760. The River Waterbody WFD Latest Status for this drainage channel is listed as 'Good'. A search of the Office of Public Works

(OPW) flood maps shows that the proposed project area and surrounding lands are not located within a known flood zone and no past flood events have occurred within the area. The site is accessed through the Keel Holiday Cottages road which provides access to the Caravan and Camping park. This road connects to a public road south of the proposed project area with the name of the Sandybanks road. Within the red line boundary of the proposed development the main habitat is built and artificial surfaces (BL3). This includes the access road to the site and the caravan parking stalls.



Figure 1. Proposed Community Facilities Location Map

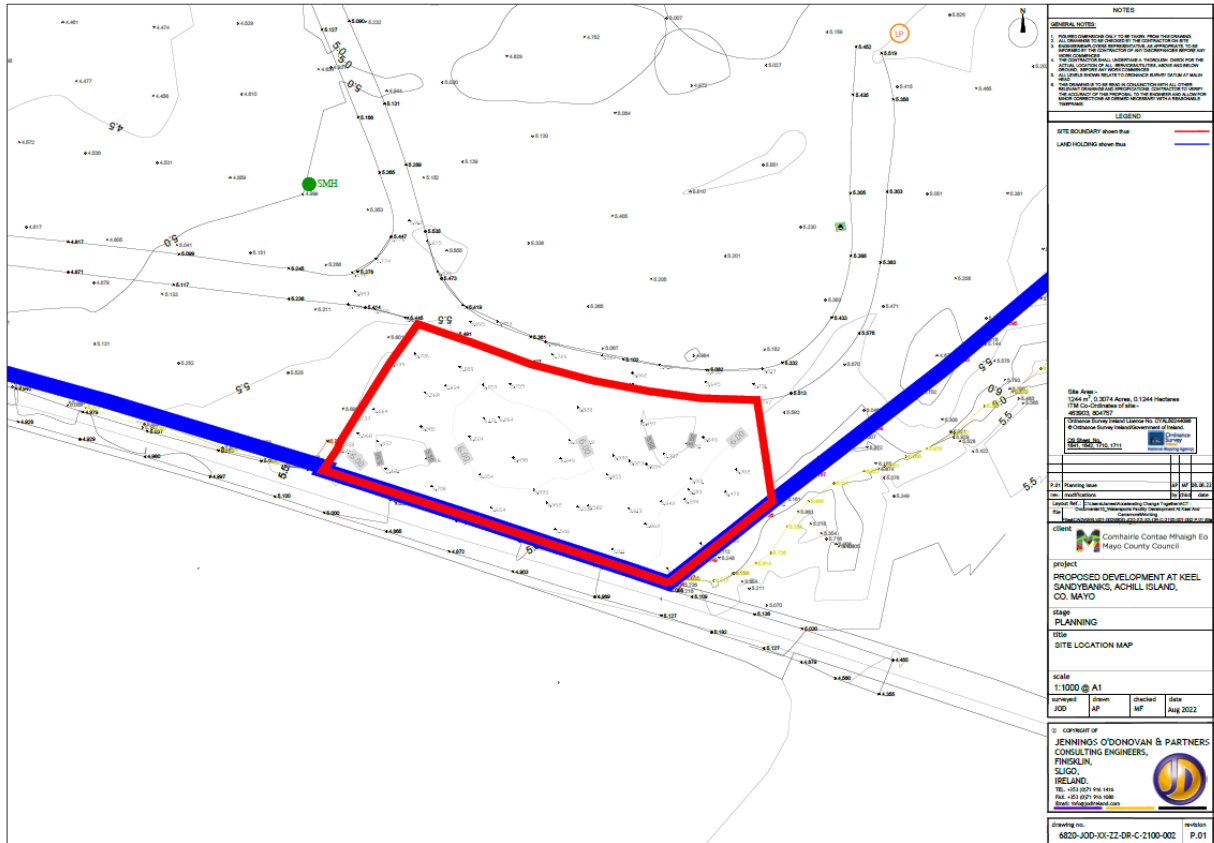


Figure 2. Proposed red line boundary location



Figure 3. Proposed building specifications and location



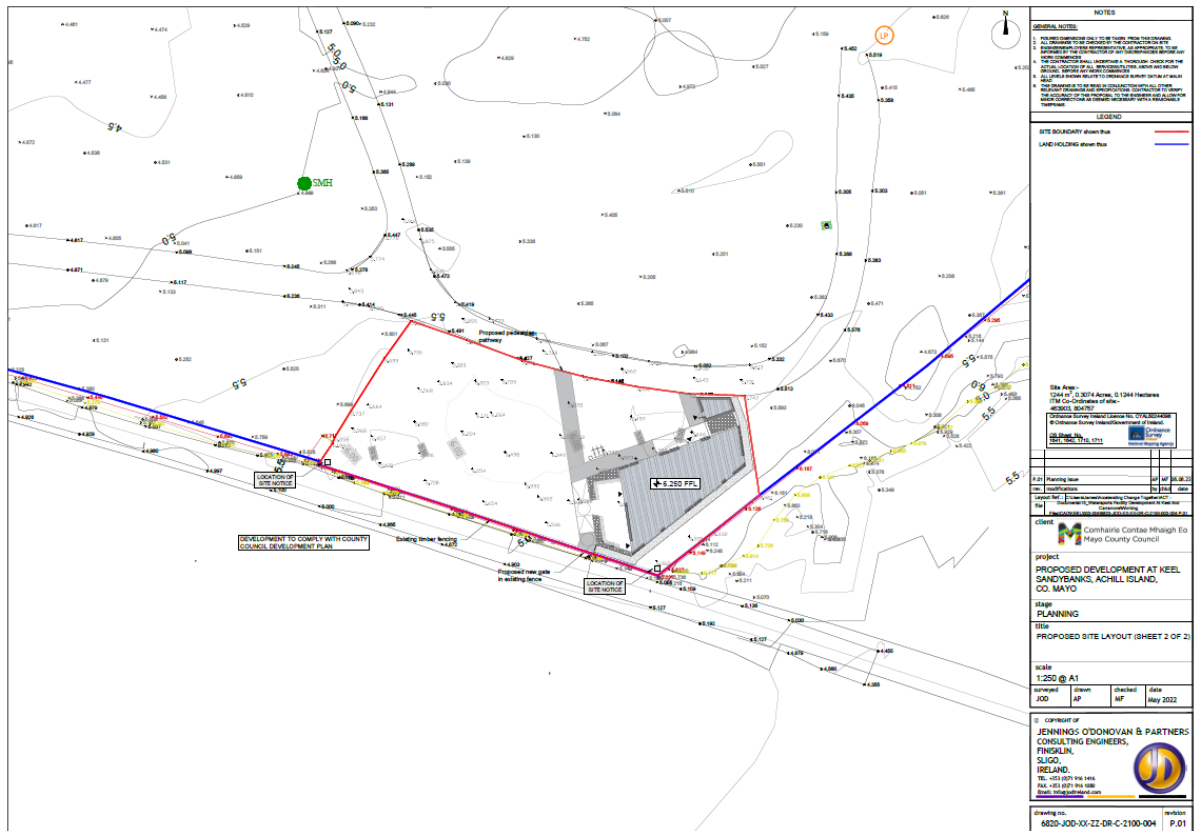


Figure 4. Proposed services building specifications

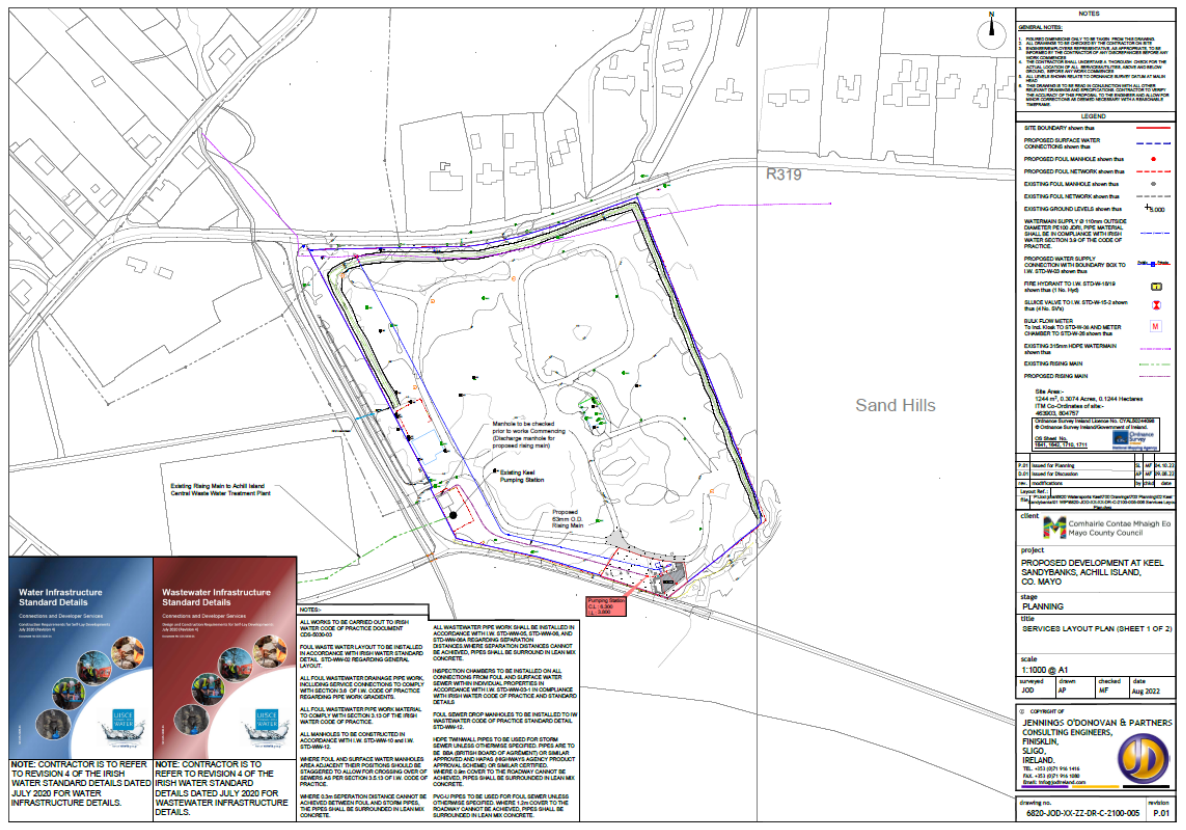


Figure 5. Water infrastructure layout



## Section 2: EIA Screening Process

### 2.1 Introduction

The legislative background is detailed within this section of the report, in order for the Competent Authority (ie. An Bord Pleanála), to review the information presented and determine if the proposed works (ie. Shared Community Facilities Project) requires the preparation of an EIAR.

### 2.2 Relevant Legislation

The requirements for an EIA derive from Council Directive 85/337/EEC (as amended by Directives 97/11/EC, 2003/35/EC and 2009/31/EC) as codified and replaced by Directive 2011/92/EU, of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment, as amended by Directive 2014/52/EU; referred to in this report as the EIA Directive. The EIA Directive has been transposed into Irish law under the Planning and Development Act, 2000, as amended and the associated Planning and Development Regulations 2001 and the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018.

This legislation and regulations identify developments by type and thresholds of scale, for which an EIAR is considered mandatory. Annex I of the EIA Directive identifies projects which require a mandatory EIAR, and Annex II identifies thresholds for projects in which an EIAR is required. These are identified under Parts 1 and 2 under Schedule 5 of the Planning and Development Regulation 2001.

The proposed project does not meet the threshold outlined in Part 2 Schedule 5 of the Planning and Development Regulation 2001, as amended, and is there for a sub-threshold project. This report details the information for the competent authority, An Bord Pleanála, to understand the impacts of the proposed project and any 'likely significant effects', alone and in-combination with other projects.

### 2.3 Methodology

Screening is the initial stage in the process to determine whether or not an EIAR is required. This determination is made through review of the mandatory and threshold projects outlined within the Planning and Development Regulations 2001 as amended. The report considered in preparation of this report guidance from the following documents and legislation:

- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment. August 2018. Department of Housing, Planning and Local Government.
- Guidelines on the Information to be contained in Environmental Impact Assessment Reports. May 2022. Environmental Protection Agency.
- Environmental Impact Assessment (EIA): Guidance for Consent Authorities regarding Sub-threshold Development. August 2003. Government of Ireland.
- Guidance on EIA Screening. June 2001. European Commission.

## Section 3: Mandatory EIAR Review

Projects that require an EIA are likely to have significant impacts on the receiving environment. These projects are listed under Annex I under the EIA Directive and Part 1 of Schedule 5 of the Planning and Development Regulations 2001, as amended (**Table 1**).

*Table 1. Projects listed under Part 1 of Schedule 5 of the Planning and Developments Regulation 2001 as amended*

Project type requiring an EIAR
Crude oil refinery or installation for the gasification and liquefaction of 500 tonnes or more of coal or bituminous shale per day
Thermal power station or other combustion installation with a heat output of 300 megawatts or more
Nuclear power station or nuclear power reactor
Installations for the reprocessing of irradiate nuclear fuel
Installations for the production or enrichment of nuclear fuel, processing of irradiated nuclear fuel or high level radioactive waste, disposal of irradiated fuel, disposal of radioactive waste, or storage (planned for more than 10 years) or irradiated fuels or radioactive waste in different site than the production site
Integrated works for the initial smelting of cast iron and steel
Installation for the production of non-ferrous crude metals from ore, concentrates or secondary raw materials by metallurgical, chemical or electrolytic processes
Extraction of asbestos or for the processing and transformation of asbestos or products containing asbestos
Integrated chemical installations (ie. Those installations for the manufacture on an industrial scale of substances using chemical conversion processes, in which several units are juxtaposed and are functionally linked to one another and which are: production of organic chemicals, inorganic chemicals, phosphorous, nitrogen or potassium based fertilisers, basic plant health products and biocides, basic pharmaceutical products using chemical or biological process and production of explosives)
Line for long-distance railway traffic, or an airport with basic runway length of 2,100m or more
Inland waterways and ports or trading ports and piers
Waste disposal installations (incineration, chemical treatment, landfill of hazardous waste and non-hazardous waste)
Groundwater abstraction or artificial groundwater recharge schemes
Works for the transfer of water resources between river basins
Wastewater treatment plants with a capacity exceeding 150,000 population equivalent
Extraction of petroleum and natural gas for commercial purposes
Dams and other installations designed for the holding back or permanent storage of water
Pipelines with a diameter of more than 800mm and a length of more than 40km
Installations for intensive rearing of poultry or pigs
Industrial plants for the production of pulp from timber or similar fibrous materials, and production of paper and board
Quarries and open-cast mining
Construction of overhead electrical power lines with a voltage of 220kilovolts or more and a length of more than 15km
Installation for the storage of petroleum, petrochemical, or chemical products
Any change to or extension of projects listed above or change to the threshold
Storage sites pursuant to Directive 2009/31/EC of the European Parliament and of the Council of 23 April 2009 on the geological storage of carbon dioxide
Installations for the capture of carbon dioxide streams for the purposes of geological storage

Furthermore, an EIAR may be required if the thresholds are met under the developments listed under Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended (**Table 2**). These projects correspond to developments listed under Annex II of the EIA Directive.

Table 2. Projects listed under Part 2 of Schedule 5 of the Planning and Developments Regulation 2001 as amended

Project type requiring an EIAR
Agriculture, silviculture and aquaculture
Extractive industry (including peat, stone, gravel, sand or clay)
Deep drilling (including geothermal drilling, storage for nuclear waste and water supplies)
Extraction of coal, petroleum (excluding natural gas), ores or bituminous shale not included in Part 1
All onshore extraction of natural gas and offshore extraction of natural gas not included in Part 1
Production of electricity, steam, and hot water
Installations for surface storage of natural gas
Installations for underground storage of combustible gases
Installations for the surface storage of fossil fuels
Installation for industrial briquetting of coal and lignite
Installations for the processing and storage of radioactive waste not included in Part 1
Hydroelectric energy production
Wind power for energy production (with more than 5 turbines or having a total output greater than 5 megawatts)
Capture of carbon dioxide streams for the purposes of geological storage not covered by Part 1
Production and processing of metals
Mineral industry
Chemical industry (development not included in Part 1)
Food industry
Textile, leather, wood, and paper industries
Rubber industry
Infrastructure projects
Tourism and leisure
Other projects

The proposed project of the shared community facility does not meet the requirements outlined within Parts 1 or 2 of Schedule 5 of the Planning and Development Regulation 2001, as amended. Section 12 of Part 2 of Schedule 5 outlines the Tourism and Leisure operations:

- (a) Ski-runs, ski-lifts and cable-cars where the length would exceed 500 metres and associated developments.*
- (b) Sea water marinas where the number of berths would exceed 300 and freshwater marinas where the number of berths would exceed 100.*
- (c) Holiday villages which would consists of more than 100 holiday homes outside built-up areas; hotel complexes outside built-up areas which would have an area of 20 hectares or more or an accommodation capacity exceeding 300 bedrooms.*
- (d) Permanent camp sites and caravan sites where the number of pitches would be greater than 100.*
- (e) Theme parks occupying an area greater than 5 hectares.*

Individual aspects of this project are also considered sub-threshold. The pipeline being placed does not exceed 40km and will not be transporting oil, gas, chemicals or carbon dioxide. The wastewater treatment system will be tying into an existing wastewater pumping station which is connected to Purteen Waste Water Treatment Plant.

This EIA Screening report provides information on the impacts to environment to the competent authority, An Bord Pleanála. Given the scale of the proposed project (ie. Shared community facilities) and a scientific review of the impacts to the environment, it is determined that it is unlikely for significant impacts to occur, both when considered alone and in combination with other projects ongoing in the vicinity.

In conclusion, the proposed project does not fall within the projects or meet the thresholds for development outlined in the parameters set in Annex I and Annex II of the EIA Directive and Part 1 and Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended. Therefore, this project is considered a sub-threshold development and an EIAR is not required.

## Section 4: Sub Threshold Development

This report provides the information detailed for inclusion in Schedule 7A of the Planning and Development Regulations 2001 as amended as follows:

1. *A description of the proposed development, including in particular –*
  - a. *A description of the physical characteristics of the whole proposed development and, where relevant, of demolition works, and*
  - b. *A description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.*
2. *A description of the aspects of the environment likely to be significantly affected by the proposed development.*
3. *A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from –*
  - a. *The expected residues and emissions and the production of waste, where relevant, and*
  - b. *The use of natural resources, in particular soil, land, water and biodiversity.*
4. *The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7.*

The competent authority, An Bord Pleanála, will have the information outlined in Schedule 7 in order to evaluate if the proposed project will have significant impacts. These criteria are as follows:

1. *Characteristics of proposed development*

*The characteristics of proposed development, in particular –*

  - (a) *The size and design of the whole of the proposed development,*
  - (b) *Cumulation with other existing development and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment,*
  - (c) *The nature of any associated demolition works,*
  - (d) *The use of natural resources, in particular land, soil, water and biodiversity,*
  - (e) *The production of waste,*
  - (f) *Pollution and nuisances,*
  - (g) *The risk of major accidents, and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge, and*
  - (h) *The risks to human health (for example, due to water contamination or air pollution)*
2. *Location of proposed development*

*The environmental sensitivity of geographical areas likely to be affected by the proposed development, with particular regard to –*

  - (a) *The existing and approved land use,*
  - (b) *The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground,*
  - (c) *The absorption capacity of the natural environment, paying particular attention to the following areas:*
    - a. *Wetlands, riparian areas, river mouths;*
    - b. *Coastal zones and the marine environment;*
    - c. *Mountain and forest areas;*
    - d. *Nature reserves and parks;*
    - e. *Areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive and;*

- f. Areas in which there has already been a failure to meet the environmental quality standards laid down in legislation of the European Union and relevant to the project, or in which it is considered that there is such a failure;*
- g. Densely populated areas;*
- h. Landscapes and sites of historical, cultural or archaeological significance.*

**3. Types and characteristics of potential impacts**

*The likely significant effects on the environment of proposed development in relation to criteria set out under paragraphs 1 and 2, with regard to the impact of the project on the factors specified in paragraph (b)(i)(I) to (V) of the definition of ‘environmental impact assessment report’ in section 171A of the Act, taking into account –*

- (a) The magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected),*
- (b) The nature of the impact,*
- (c) The transboundary nature of the impact,*
- (d) The intensity and complexity of the impact,*
- (e) The probability of the impact,*
- (f) The expected onset, duration, frequency and reversibility of the impact,*
- (g) The cumulation of the impact with the impact of other existing and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment, and*
- (h) The possibility of effectively reducing the impact.*

## Section 5: Characteristics of the Proposed Project

The information provided in the subsections below is the information required by Section 7 of the Planning and Development Regulation 2001 as amended and is outlined in **Section 4** in this report.

### 5.1 Size and Design of the Proposed Project

The development site for the proposed project is centred at Grid Reference F 63955 04741 at Keel Beach, Keel, Co. Mayo. The Lat/Long coordinates for the proposed development site are 53.974082°, -10.074423°. The red line boundary for the shared community facility is 400m<sup>2</sup>, however the actual area being disturbed is much smaller than this. The facilities building is being constructed within an existing caravan and camping park consisting of built and artificial land (BL3) habitat. The facility is tying into an existing wastewater pumping station which is connected to Purteen Waste Water Treatment Plant. The stages of construction are yet to be confirmed once the tender has been awarded. It is anticipated the construction of the facility will take between 6 months and 1 year to complete. There are no demolition works in association with the shared community facilities project.

### 5.2 Cumulative Impacts with other Proposed Projects

A search of the Mayo County Council planning enquiry system

(<https://mayococo.maps.arcgis.com/apps/webappviewer/index.html?id=2b1fc4da0e214d25b5727fecb908ae27>)

was carried out on the 1<sup>st</sup> of February 2023. Finalised applications lodged within the vicinity of the proposed development within the last 5 years were examined. The majority of the planning applications within the immediate vicinity of the proposed development site were all older than 5 years ago and consisted of residential developments. One development to the north of the proposed development area is from 2019 and consists of permission for retention of a development that is a dwelling house. In the surrounding lands there is a further development from 2020 for construction of an agricultural shed along with all necessary site works and ancillaries. With the majority of these applications being older than 5 years and given the small scale in nature combined with the small scale of the proposed project development; it is unlikely that there will be significant impacts alone or with combinations to other plans and projects in the vicinity.

A search of the EPA Appropriate Assessment mapping tool shows the licenced emissions within the vicinity of the proposed project. No licenced emissions are within the vicinity of the project area (**Figure 6**).

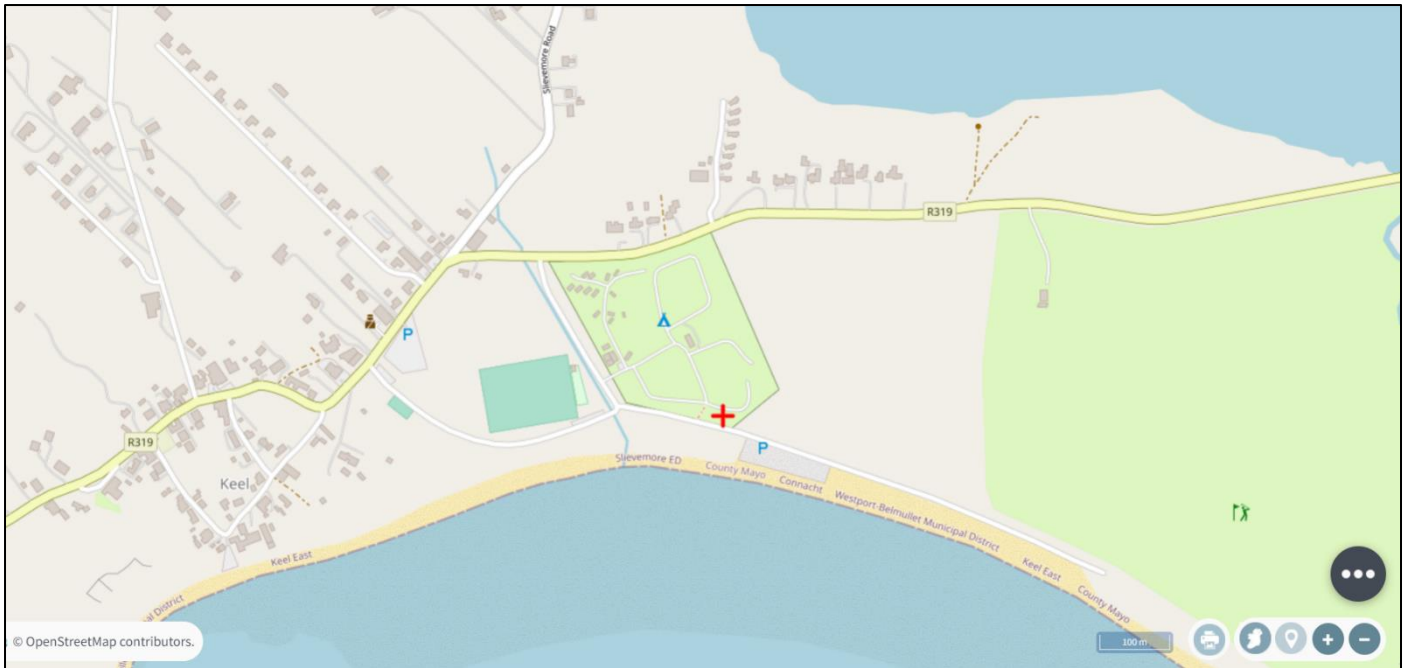


Figure 6. Licenced emissions within the proposed project area and surrounding lands

### 5.3 Nature of any Associated Demolition Works

There are no demolition works for the proposed shared community facilities project.

### 5.4 Use of Natural Resources

The construction of the facilities will require disturbance of the soil and subsoil. This is an unavoidable effect of the development, but every effort will be made to ensure that the amount of earth materials excavated is kept to a minimum in order to limit the effect on the geological aspects of the site. Landscaping areas will be sealed and levelled using the back of an excavator bucket to prevent erosion. Good site practice will be applied to ensure no fuels, oils, wastes or any other substances are stored in a manner on site in which they may spill and enter the ground. Dedicated, bunded storage areas will be used for all fuels or hazardous substances.

The solar panels are used to heat the water for the facilities and have an estimated electrical output of 9KW. This may vary depending on sunlight conditions.

### 5.5 Production of Waste

The proposed project will involve the creation of a shared community facility and may generate soil waste during the excavation stage. Any excess soil material be disposed of a licenced site. Any other waste materials created during construction will be disposed of in the provided skips. The facility will be connected to an existing wastewater pumping station which is connected to Purteen Waste Water Treatment Plant. No other wastes will be produced by the facility.



## 5.6 Risk of Accidents

The risk of accidents to the proposed project will be minimised by following best industry practices. The main types of accidents occurring during the construction phase would be traffic collisions and construction site hazards. Traffic accidents risk exists mainly due to lorries containing materials for the construction. Construction site hazards will be minimised by following best industry practices and the largest risk comes from the public entering the site without the knowledge or consent of the site management. Signage will be posted to deter the public from entering dangerous areas as well as necessary fencing.

## 5.7 Risk to Human Health

During construction there is potential for noise and air pollution. Air pollution potential exists from dust during dry conditions. These risks will be managed by following best industry practices to reduce the impacts. The hours of construction activity will be limited to avoid unsociable hours where possible. Construction operations shall generally be restricted between 8:00 and 18:00 on weekdays. However, to ensure that optimal use is made of good weather periods or at critical periods within the programme it could be necessary on occasion to work outside these hours. Any such hours working will be agreed in advance with the local Planning Authority.

No risk to human health is posed during the operation phase of this proposed project.

## Section 6: Location of the Proposed Project

As detailed in **Figure 7** and **Table 4** below, the proposed project area is directly adjacent to Keel Machair/Menaun Cliffs SAC (001513). An NIS has been prepared for this proposed development and includes mitigation measures to ensure that there will be no significant effects on any European site. With these mitigation measures in place, it is unlikely there will be significant impacts to any environmentally sensitive sites.

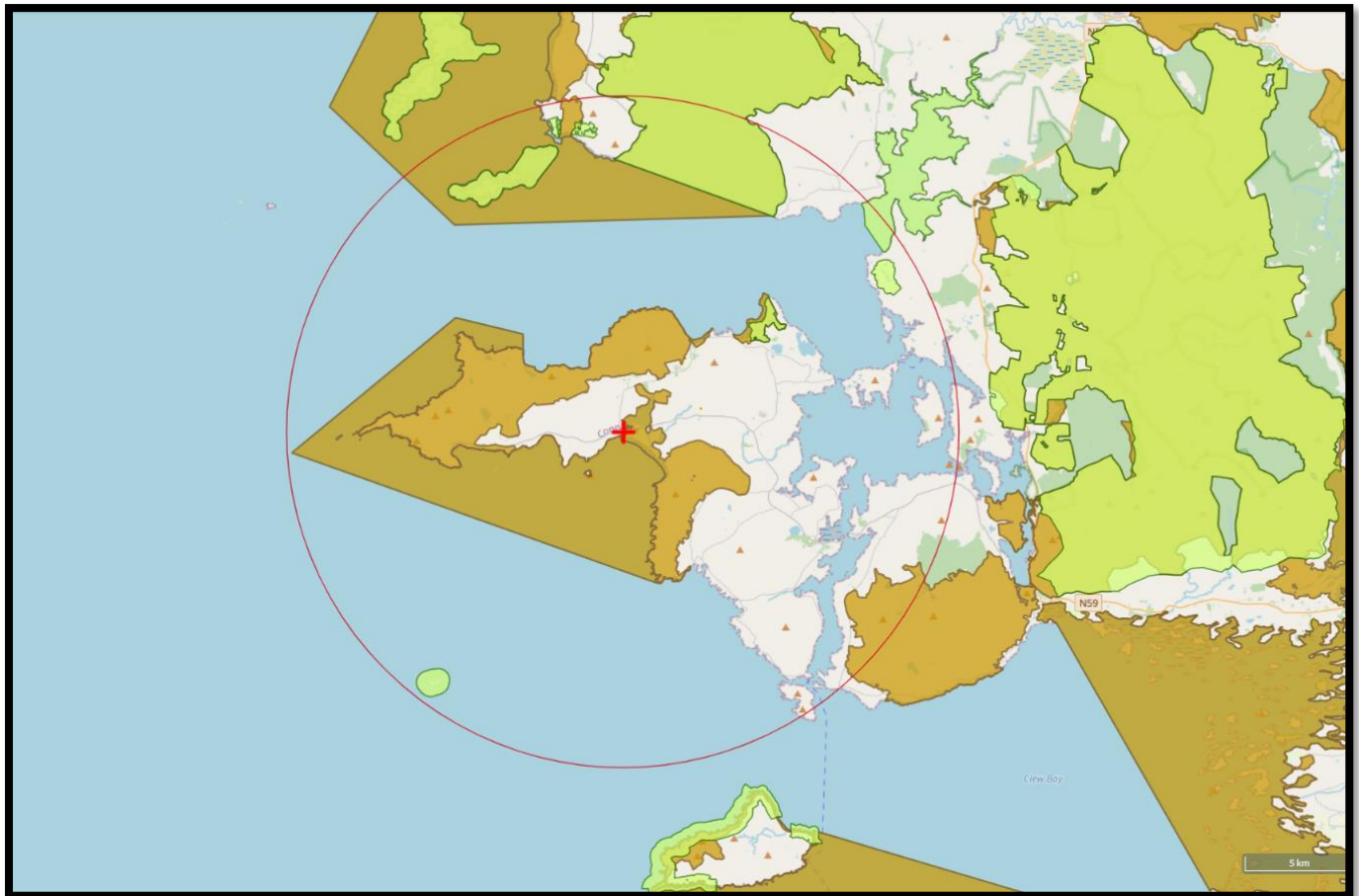


Figure 7. Natura 2000 Sites within a 15km radius of the proposed project area

Table 3. European sites located within a 15km radius of the proposed project site.

Designated Site	Site Code	Approximate Distance from Proposed Works (m)
Keel Machair/Menaun Cliffs SAC	001513	19.75
Achill Head SAC	002268	194.93
Croghaun/Slievemore SAC	001955	2558.70
Doogort Machair/Lough Doo SAC	001497	6655.03
West Connacht Coast SAC	002998	9715.69
Mullet/Blacksod Bay Complex SAC	000470	11571.92
Duvillaun Islands SAC	000495	11961.77
Corraun Plateau SAC	000485	12461.47
Doogort Machair SPA	004235	7081.44
Blacksod Bay/Broad Haven SPA	004037	11571.92
Duvillaun Islands SPA	004111	11939.15
Bills Rocks SPA	004177	13488.22
Mullet Peninsula SPA	004227	13498.54

There are two Natural Heritage Areas (NHAs) within a 15km radius of the proposed project area including Doogort East Bog NHA (002381) located approximately 4.3km northeast of the proposed project area and Sraheens Bog NHA (002403) located approximately 7.9km southeast of the proposed project area.

The proposed project area occurs directly adjacent to the proposed Natural Heritage Area (pNHA) of Keel Machair/Menaun Cliffs (001513). There are eight other pNHAs within a 15km radius including:

- **001967 Inish galloon pNHA**  
2km southwest of the project area (PA)
- **001955 Croaghaun/Slievemore**  
2.6km north of the PA
- **001497 Doogort Machair/Lough Doo**  
6.6km northeast of the PA
- **001488 Corraun Point Machair/Dooreel Creek**  
12.4km northeast of the PA
- **000485 Corraun Plateau**  
12.5km southeast of the PA
- **000495 Duvillaun Islands**  
11.9km northwest of the PA
- **000470 Mullet/Blacksod Bay Complex**  
13.6km north of the PA
- **000469 Bills Rocks**  
13.9km southwest of the PA

While the Keel Machair/Menaun Cliffs NHA (001513) is directly adjacent to the proposed development area, an NIS report has also been prepared. With the recommended mitigation measures from the NIS report, these will ensure that no significant impacts occur to the ecological habitat protected within this NHA. There are no watercourses within the proposed development boundary and therefore no hydrological connection to any of the NHAs or pNHAs or any of the Natura 2000 sites within the 15km radius. Habitats within the red line boundary for the proposed development site consist of previously disturbed lands and do not include any ecologically sensitive habitats.

## 6.1 Existing and Approved Land Use

The proposed project is located approximately 700m east of the village of Keel, Co. Mayo. The proposed project area consists of a caravan and camping park with the habitat being built and artificial surfaces (BL3). The surrounding lands are currently used for recreation and tourism including Keel Beach, and Achill Island Golf Club located to the east of the proposed development site. There are several residential developments and small businesses within the vicinity of the proposed project area as well as agricultural lands.

There are no historical features within the proposed project boundary. Approximately 100m to the east there is an historical feature listed as “Field System” and “Midden”. Another historical feature is located approximately 900m to the west and is listed as “Children’s burial ground”.

Historical records within the proposed project area and surrounding lands are shown in **Figure 8**. Due to the distance from the proposed project site, it is unlikely there will be any impacts on any historical features within the area.



Figure 8. Historical Records within the vicinity of the proposed project area.

## 6.2 The relative abundance, availability, quality, and regenerative capacity of natural resources in the area and its underground

A Natura Impact Statement (NIS) Report was also prepared for this project and determined, with implementation of mitigation measures, the proposed project will not have an adverse impact on the integrity of the receiving environment (including soil, land, water and biodiversity).

## 6.3 The absorption capacity of the natural environment

As outlined in Schedule 7 of the Planning and Development Regulation 2001, as amended, the impacts to environmental sensitivity are regarded with particular emphasis on:

*The absorption capacity of the natural environment, paying particular attention to the following areas:*

- *Wetlands, riparian areas, river mouths;*
- *Coastal zones and the marine environment;*
- *Mountain and forest areas;*
- *Nature reserves and parks;*
- *Areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive and;*
- *Areas in which there has already been a failure to meet the environmental quality standards laid down in legislation of the European Union and relevant to the project, or in which it is considered that there is such a failure;*
- *Densely populated areas;*
- *Landscapes and sites of historical, cultural or archaeological significance.*

Within the red line boundary of the proposed development the habitat is built and artificial surfaces (BL3). The area is currently used as a caravan and camping park and includes access roads and parking stalls for the caravans. The area to the west includes Keel Holiday Cottages road which connects to the road located south of the proposed project area (The Sandybanks road) travelling east/west. Further west there is a drainage channel and machair habitat (CD6). Directly adjacent to the proposed development area to the east is Keel Machair/Menaun SAC and includes habitats of Machair (CD6), and Fixed Dune (CD3). The golf course is also located to the east of the proposed development area. South of the Sandybanks road there is coastal habitats of Marram dune (CD2), Sand shores (LS2) and Muddy sand shores (LS3). The proposed development area only contains previously disturbed habitat. There are no watercourses or wetlands within the immediate vicinity of the project location, nor are there mountain areas,

forested areas, nature reserves or parks. The site is near a coastal location but does not contain any coastal habitats and is approximately 70m from the start of the beach with the Sandybanks road occurring within this distance.

The nearest Natura 2000 site is directly adjacent the proposed development area to the east, this area is also protected as a pNHA. With mitigation measures recommended in the NIS report, there are no significant impacts on the integrity of the European site anticipated. The proposed project boundary contains built and artificial habitat (BL3) and is not considered natural habitat. Details of the protected sites within a 15km radius of the project area are covered in **Section 6**.

Keel is the nearest densely populated location near the proposed project area and is located roughly 700m west of the site. Due to the small scale of the proposed project, there are no anticipated impacts on this densely populated area. As detailed in **Section 6.1**, there are no historical features within the proposed project area. The nearest historical feature is located approximately 100m east, and due to the scale of the proposed project and the distance to the historical feature it is unlikely there will be any impacts on this historical feature.

## Section 7: Characteristic of the Potential Impact

Section 3 of Schedule 7 of the Planning and Development Regulation 2001 as amended outlines the requirements for the potential impacts as detailed below.

### 7.1 The Magnitude and Spatial Extent of the Impact

The potential for significant effects is primarily associated with the construction stage of this proposed project. These impacts are likely to be temporary in nature with estimates for construction taking place from 6 – 12 months.

There is potential for noise and air pollution during this construction phase, however, industry best management practice standards will be followed including but not limited to:

- Reporting any sign of pollution or environmental damage to the manager no matter how small
- Reporting any spills incidents or near misses that occur to the site foreman immediately
- Refuelling in designated areas only
- Not disposing of anything into a drain or onto land
- Not dropping litter or allow litter to blow around the site and disposing of all wastes in the skips provided
- Not driving plant or machinery outside the Authorised working boundaries

Given the scale and associated construction timing, impacts are considered minimal.

### 7.2 The Nature of the Impact

The proposed project provides a shared community facility for Keel Beach. The impacts from construction will be minimal and temporary in nature and are contained into a small area, as the redline boundary measures 400m<sup>2</sup> and the actual area of impact will be much less than this. The surrounding lands are used for recreation and tourism and also includes residential houses and businesses. There are areas used for agricultural purposes in the vicinity. The proposed area is currently used for tourism and leisure by the local population. Given the increase of tourism and leisure this facility would bring to Keel Beach, the overall impact of the proposed project is considered to be positive.

### 7.3 The Transboundary Nature of the Impact

Given the scale of the proposed project (400m<sup>2</sup>), any impacts will be localised and minimal, and will not result in any transboundary impacts.

### 7.4 The Intensity and Complexity of the Impact

The construction phase of the proposed project is predicted to have negative impacts of noise and dust. These are both temporary impacts and are not considered to be significant. Once the project moves onto the operation phase, there are low impacts on the local environment expected.

**Ecology:** The red line boundary contains built and artificial surfaces habitat (BL3). The proposed project area is currently used as a caravan and camping park and includes access roads and parking stalls. The proposed project will not have a significant impact on the receiving environment (including soil, land, water, and biodiversity).

**Soils and Geology:** The redline boundary area for the proposed project is 400m<sup>2</sup> in size, with the actual area to be disturbed being much smaller than this. It is expected that the excavation nature of the work will be minimal and therefore there are no anticipated impacts on soils or geology.



**Water:** There are no watercourses or wetlands within the proposed project area, and as a result, there are no anticipated impacts in regards to water resources. The proposed project area is not located within a flood zone or in the vicinity of any known flood zone. No past flooding events have occurred within the area or surrounding lands.

**Air and Climate:** Dust may be generated during the construction phase of the project if conditions during construction are dry. These impacts will be temporary. Due to the limited size and scale of the project and the implementation of best management practices, it is determined that impacts on air and climate will not be significant.

**Noise and Vibration:** During the construction phase of the project there will be some effect on the nearby noise sensitive properties due to emissions and vibrations from site traffic and other activities. The hours of construction activity will be limited to avoid unsociable hours where possible. Construction operations shall generally be restricted between 8:00 and 18:00 on weekdays. However, to ensure that optimal use is made of good weather periods or at critical periods within the programme it could be necessary on occasion to work outside these hours. Any such hours working will be agreed in advance with the local Planning Authority.

**Population and Human Health:** The proposed development poses a risk to human health during construction in the form of noise, vibration and air pollution. These risks will be mitigated to reduce the impacts following best industry practices. Operation of the shared community facilities does not pose any risk to human health.

**Material Asset – Traffic and Transport:** Traffic into the area will increase during the construction phase of the proposed project. During the operation phase of the project, it is anticipated the traffic to the area will increase to make use of the facilities. The increase in tourism and leisure is expected to overall have a positive impact on the area.

**Landscape:** The current land use of the area is already tourism and leisure with the existing camping facilities for users of Keel Beach. The shared community facility will enhance the uses of the current area and will not adversely impact the landscape. The building design is smaller than the 400m<sup>2</sup> boundary and includes features such as a grass roof to adhere to the natural landscape. Scenic views will not be disrupted.

**Archaeology, Architecture and Cultural Heritage:** There are no historical features within the proposed project area. The closest is 100m east and given the small scale of the project it is unlikely there will be any impacts on this or any historical features.

**Interactions:** There are no recent ongoing projects within the proposed project area or the immediate vicinity. No interactions with any projects are anticipated to have a significant impact. The construction phase will have the most impacts on the landscape, however, these are deemed to be temporary.

## 7.5 Probability of the Impact

The construction phase of this development will have the highest impacts on the landscape through noise and air pollution (ie. Through dust during dry conditions). The construction will follow best industry practices to reduce any potential impacts.

## 7.6 Expected onset, duration, frequency and reversibility of the Impact

The majority of the adverse effects will occur during the construction phase of the project and will be temporary. The associated habitat loss from the facility will be permanent and irreversible, however, this habitat is already disturbed and heavily managed and is not considered ecologically sensitive and has a low biodiversity. The Natura Impact Statement (NIS) report determined that given mitigation measures there are no adverse effects to any Natura 2000 sites.



## 7.7 Cumulation of the Impact

The proposed project will not have any adverse effect in combination with other projects in the surrounding lands (**Section 5.2**).

## 7.8 The Possibility of effectively reducing the Impact

Construction of the proposed project will follow best industry standards as well as any mitigation measures from An Bord Pleanála to reduce impacts to the landscape. This will effectively reduce any potential impacts that could be incurred during the construction phase.

The operational phase of the community facility is deemed to have an overall positive impact for the community due to the increase in tourism and leisure activities at Keel Beach.

## Section 8: Conclusion

The proposed project does not occur within the activities listed under Annex I or Annex II of the EIA Directive, nor does it meet the thresholds outlined in Part 1 and 2 of Schedule 5 of the Planning and Development Regulation 2001, as amended. Due to the limited sized of the proposed project, the lack of any watercourses occurring within the area and the unlikely impacts on any Natura 2000 site (with implementation of the mitigation measures recommended in the NIS report), the impacts of this proposed project are not deemed significant. This project is therefore a sub-threshold project and did not meet or exceed the limitations that would require an EIAR. It has therefore been concluded that an EIAR is not required for this proposed project.

**Table 5** below details the screening checklist questions as provided by Europa.

Table 4. Europa screening checklist questions for EIA Screening

Questions to be Considered	Yes/No Briefly Describe	Is this likely to result in a significant effect? Yes/No – Why?
1. Will construction, operation or decommissioning of the project involve actions which cause physical changes in the locality (topography, land use, changes in waterbodies, etc)?	Yes	No. There are no significant effects anticipated based on the size of the proposed project. No environmentally sensitive habitats or areas occur within the proposed project boundary. There are no watercourses in the proposed project area or in the immediate vicinity that could be impacted.
2. Will construction or the operation of the Project use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or are in short supply?	Yes	No. The proposed project is for the shared community facility which will utilise a renewable energy source through the use of solar panels to heat the water.
3. Will the Project involve the use, storage, transport, handling or production of substances or materials which could be harmful to human health, to the environment or raise concerns about actual or perceived risks to human health?	No	No. The construction of the facility will use standard construction materials. Any waste generated during the operation of this facility will be treated using an existing wastewater pumping station which is connected to Purteen Waste Water Treatment Plant.
4. Will the Project produce solid wastes during construction or operation or decommissioning?	Yes	No. Any waste generated during the operation of this facility will be treated using an existing wastewater pumping station which is connected to Purteen Waste Water Treatment Plant. Any wastes produced during the construction phase will be disposed of in the skips provided or at licenced facilities and will follow best industry practices.
5. Will the Project release pollutants or any hazardous, toxic, or noxious substances to air or lead to exceeding Ambient Air Quality standards in Directives 2008/50/EC and 2004/107/EC?	No	No. There is a potential for dust pollution during the construction phase should conditions be dry. Mitigations for this will follow best industry practice guidelines and the impacts will likely be temporary and short-term. It is unlikely that this project will release any hazardous, toxic or noxious substances to air or lead to exceeding Ambient Air Quality standards in Directives 2008/50/EC and 2004/107/EC.
6. Will the Project cause noise and vibration or the releasing of light, heat energy or electromagnetic radiation?	No	No. It is only expected for noise and vibration impacts to occur during construction which are considered temporary.

Questions to be Considered	Yes/No Briefly Describe	Is this likely to result in a significant effect? Yes/No – Why?
7. Will the Project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, ground water, coastal waters or the sea?	No	No. This risk is deemed low to negligible.
8. Will there be any risk of accidents during construction or operation of the Project that could affect human health or the environment?	Yes	No. While there are risks during construction of the shared community facility, efforts will be made to keep members of the public out of the project area to reduce risk.
9. Will the Project result in environmentally related social changes, for example, in demography, traditional lifestyles, employment?	No	No. The proposed project is for the erection of a shared community facility. It is unlikely the proposed project will have an impact on demography, traditional lifestyles, or employment.
10. Are there any other factors that should be considered such as consequential development which could lead to environmental impacts or the potential for cumulative impacts with other existing or planning activities in the locality?	No	No. The proposed project will not cause any significant impacts to the environment alone or in combination with projects in the vicinity.
11. Is the Project located within or close to any areas which are protected under international, EU, or national or local legislation for their ecological, landscape, cultural or other value, which could be affected by the Project?	Yes	No. With implementation of the mitigation measures recommended in the NIS report, it is unlikely there will be significant impacts on any Natura 2000 site.
12. Are there any other areas on or around the location that are important or sensitive for reasons of their ecology e.g. wetlands, watercourses or other waterbodies, the coastal zone, mountains, forests or woodlands, that could be affected by the Project?	No	No. There are no environmentally sensitive areas within the red line boundary of the proposed project. Habitats to be impacted include built and artificial surfaces (BL3). With implementation of mitigation measures recommended in the NIS report, it is unlikely there will be any significant impacts to the surrounding lands. There are no wetlands or watercourses within the proposed project area and the coastal zone is approximately 70m south and is buffered by built and artificial surfaces. There are no mountains, forests or woodlands that can be impacted by the proposed project.

Questions to be Considered	Yes/No Briefly Describe	Is this likely to result in a significant effect? Yes/No – Why?
13. Are there any area on or around the location that are used by protected, important or sensitive species of fauna or flora e.g. for breeding, nesting, foraging, resting, overwintering, migration, which could be affected by the Project?	Yes	No. While the proposed development area is directly adjacent to the Keel Machair/Menaun Cliffs SAC it is unlikely there will be any impacts to the ecological integrity of the site with implementation of the mitigation measures recommended in the NIS report. There are no ecologically sensitive habitats within the proposed red line boundary. The proposed project will not cause adverse effects on any designated habitats or legally protected species.
14. Are there any inland, coastal, marine or underground waters (or features of the marine environment) on or around the location that could be affected by the Project?	No	No. The proposed project will not cause adverse effects on any water features.
15. Are there any areas or features of high landscape or scenic value on or around the location which could be affected by the Project?	Yes	No. The proposed project area is in an area of high scenic value however the building is set back from the beach and will not impact any of the scenery. The building is also designed to be incorporated to the surrounding habitat including features such as a grass roof.
16. Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the Project?	No	No. The area is currently being used for recreation and this project will not impact the area negatively in this respect.
17. Are there any transport routes on or around the location that are susceptible to congestion or which cause environmental problems, which could be affected by the Project?	No	No. Transport routes will not be impacted by the proposed project.
18. Is the Project in a location in which it is likely to be highly visible to many people?	No	No. While there are some residential properties within the area, it is still located approximately 700m from Keel and is not likely to impact a large number of people.
19. Are there areas or features of historic or cultural importance on or around the location that could be affected by the Project?	No	No. The nearest historical feature is located approximately 100m away and due to the small scale of the proposed project it is unlikely to have any impacts on this or any historical features.

Questions to be Considered	Yes/No Briefly Describe	Is this likely to result in a significant effect? Yes/No – Why?
20. Is the Project located in a previously undeveloped area where there will be loss of greenfield land?	No	No. The project area is located within previously disturbed habitat of built and artificial surfaces.
21. Are there existing land uses with or around the location e.g. homes, gardens, other private property, industry, commerce, recreation, public open space, community facilities, agriculture, forestry, tourism, mining or quarrying that could be affected by the Project?	Yes	No. The area is currently being used for recreation and tourism and will continue to be used for these purposes after the project completion.
22. Are there any plans for future land uses within or around the project location that could be affected by the Project?	No	No. There are no other future developments within the area that will impact the proposed project.
23. Are there areas within or around the location which are densely populated or built-up, that could be affected by the Project?	No	No. Keel is the closest village with a high density and is located approximately 700m away.
24. Are there any areas within or around the location which are occupied by sensitive land uses e.g. hospitals, schools, places of worship, community facilities, that could be affected by the Project?	No	No. While there are some small businesses within the vicinity there are no sensitive land uses within the surrounding lands.
25. Are there any areas within or around the location which contains important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, that could be affected by the Project?	No	No. There are no areas in the proposed project area or surrounding lands that contain high quality or scarce resources.
26. Are there any areas on or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, which could be affected by the Project?	No	No. There are no emissions expected from the proposed project and there are no licenced emitters within the proposed project area or immediate vicinity.
27. Is the Project location susceptible to earthquakes, subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions e.g. temperature inversions, fogs, severe winds, which could cause the Project to present environmental problems?	No	No. The site is not susceptible to any extreme events.

## Section 9: References

- Department of Housing, Local Government and Heritage (2000) Planning and Development Act, 2000.
- Department of Housing, Local Government and Heritage (2001) Planning and Development Regulations 2001 – 2022.
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