



**CHUIG: GACH BALL DE LIMISTÉIR AN
CHOMARAIGH, PORT LÁIRGE**

**TO: EACH MEMBER OF THE COMERAGH
DISTRICT OF WATERFORD**

**Part VIII Planning Report Development
of Mahon Bridge Car Park in the
townland of Kilcomeragh,
Kilmacthomas, Co. Waterford.**

**REPORT PREPARED PURSUANT TO THE
REQUIREMENTS OF SECTION 179 OF THE
PLANNING AND DEVELOPMENT ACT, 2000
(AS AMENDED)**

Roads, Water & Environment
Waterford City & County Council
Civic Offices, Dungarvan,
Co Waterford.

TABLE OF CONTENTS

1	INTRODUCTION	2
2	SCHEME BACKGROUND	2
2.1	SCHEME LOCATION	2
2.2	EXISTING ENVIRONMENT.....	4
3	PROPOSED WORK	3
4	ENVIRONMENT RESTRICTIONS	5
5	IMPACT OF THE SCHEME	5
6	SUBMISSIONS AND RESPONSE.....	7-10
8	CONCLUSION.....	10
9	RECOMMENDATION	11

Appendix A - Appropriate Assessment (AA) Report

Appendix B - Environmental Impact Assessment Screening Report

Appendix C - Part 8 Publication Drawing - Mahon Bridge Car Park

1 INTRODUCTION

This report provides information to facilitate a Part VIII planning application under the Planning and Development Act, 2000, (as amended) for the proposed car park development at Mahon Bridge in the townland of Kilcomeragh, this site is located along R676 Carrick to Lemybrien Road, the local primary roads L3019 and L3021. It also links into the newly extended Crough Wood walk trail adjacent to L3021.

The proposed works will provide 129 car park spaces which includes 2 disabled parking, provision for a bus stop, a set down area, seating and bike parking area, pathway with planting and wetlands with biodiversity planting.

2 SCHEME BACKGROUND

Mahon Bridge (IS 34187 06070) is located just off the R676 Carrick-on-Suir to Lemybrien Road. Situated south of the Comeragh and east of the Monavullagh Mountain ranges, Mahon Bridge is an ideal base to facilitate access to some of Waterford's most scenic upland areas. Most notably the proposed parking area and trailhead at Mahon Bridge would facilitate safe and enhanced access to the Crough Wood Walk which has been developed by Comeragh Community Development Group in collaboration with Waterford City & County Council, Coillte and other supporting agencies over a number of years. The proposed development would also facilitate those visiting Mahon Falls as a pedestrian, cyclist or motorist. The growth in popularity of numerous diverse outdoor pursuits in recent years, particularly in this area of the Comeraghs has helped stimulate economic activity and a number of small businesses have opened in the area in recent years.



Figure 1: Walk Waterford map showing popular walking routes in the area including Crough Wood Walk and Mahon Falls Walk

Mahon Bridge is popular at all times of the year and particularly during holiday periods. Due to the increased visitor numbers which has led to traffic congestion issues along the local roads, there is a requirement to provide additional parking at this location.

A temporary car park was constructed in June 2021 to alleviate the parking issues at entrances and along the road ways during the summer months and is working satisfactorily. However this proposed development is to facilitate additional parking to cater for peak traffic flows during dry weather spells and facilitate a park and ride area so visitors can be collected by bus and transported to other popular locations within the Comeragh Mountain region. The proposed parking area is also adjacent to a number of popular cycling routes. With bicycle parking included in the plan this new proposed parking area will allow cyclists use the area as their base for their chosen activity.

Screening for both Appropriate Assessment and Environmental Impact Assessment was undertaken by Waterford City and County Council (WCCC). Screening concluded that an EIAR or NIS were not required for the development of this car park.

2.1 SCHEME LOCATION

The proposed car park at Mahon Bridge (IS 34187 06070) is located just off the R676 Carrick-on-Suir to Lemybrien Road and the area of site is approximately 1.3 acres.

2.2 EXISTING ENVIRONMENT

The proposed car park development is within a rural setting and agricultural lands. The Mahon River is located approximately 40 metres North of Mahon Bridge development. Between the public road and River there is a wooded area owned by Coillte which is where the Crough Wood Trail traverses leading to a pathway which follows along the River.

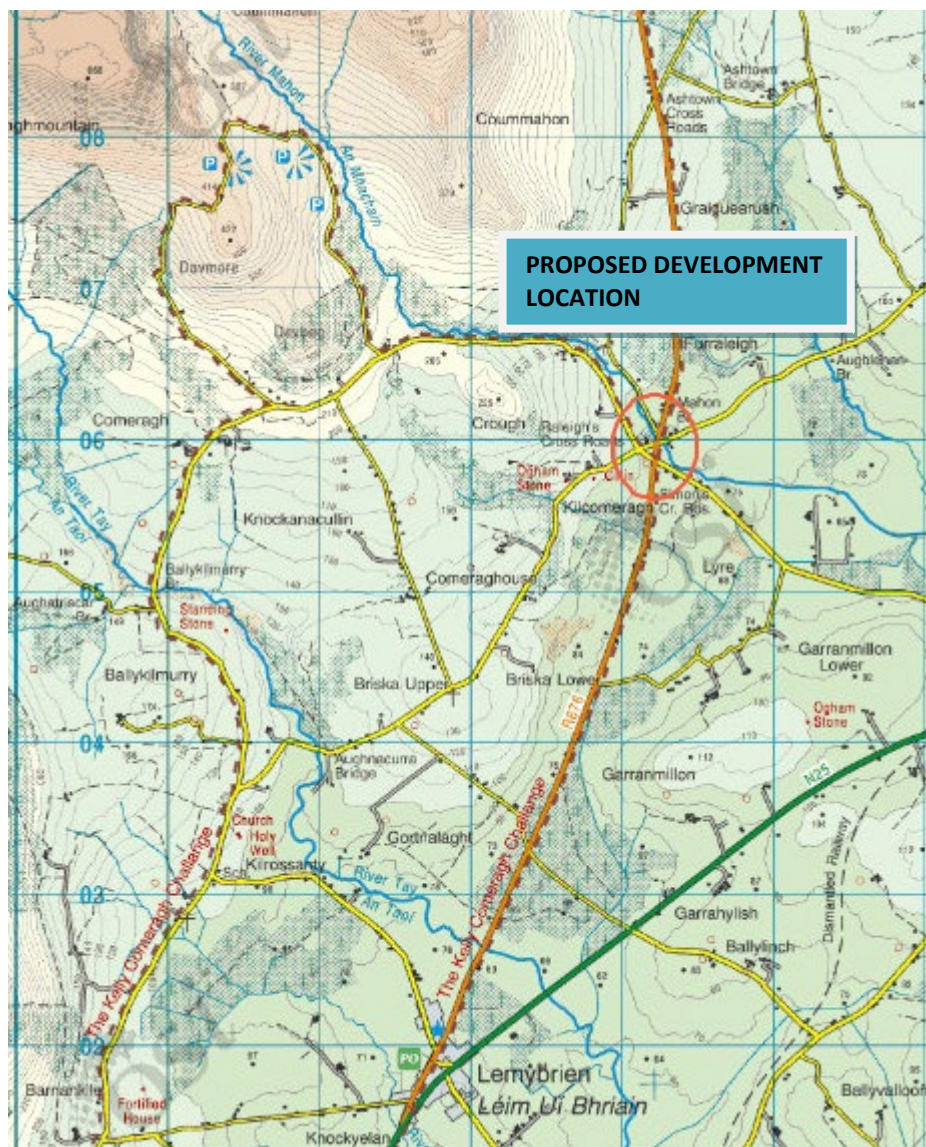


Figure 1 – Location of the Proposed Development – each square is 1 km (1/400)

3 PROPOSED WORK

The proposed works is to provide 129 car parking spaces which includes 2 disabled parking spaces and also provision for a bus stop, a set down area, seating and bike parking, pathway with planting and wetlands with biodiversity planting and a soakway area.

The footprint of the existing car park is approximately 1.3 acres. This development is located along R676 Carrick to Lemybrien Road, Local primary roads L3019 and L3021. The site works will include the following:

- Site clearance , earthworks and drainage;
- Pavement Surface for car park, bus set down area;
- The creation of a vehicular entrance/exit including sight lines at entrance/exit;
- New gravel pathway through car park with landscape planting and trees ;
- A wetlands area to be constructed at the centre of site with biodiversity planting;
- The creation of recreational area and bike parking at three corners of the site;
- Three new pedestrian/cyclist access gates at three corners;
- The removal of a top part of stone wall for sightline improvements and reuse within site;
- Erection of a height barrier restriction at entrance/exit location;
- Signing and lining;
- All associated ancillary works and accommodation works.

4 ENVIRONMENTAL RESTRICTIONS

None envisaged.

5 IMPACT OF THE SCHEME

The development of a car park will:

- Avoid parking at the entrances;
- Avoid car parking along the public road and allow for safe off road parking;
- Allow for safe access via a pathway from the car park to the beginning of the trail and access businesses within the area;
- Allow safe access at new entrance with adequate sightlines;

- Improve sightlines at junctions;
- Dedicated set down area to promote park and ride facility;
- Improve recreational facilities with new picnic benches and bike parking;
- Allow for disability access and parking;
- Improve access for other users to the site;
- The proposed pathway with biodiversity planting elements and wetlands are within this site will contribute to the local biodiversity and provide suitable forage for pollinators;
- Retain existing features like the stone depot and water pump;
- The car park development will be positive for residents and businesses within the immediate environs of the proposed car park, and also visitors to the area by providing a dedicated parking area, seating area;
- There is a popular and well used existing trail in the valley north of Crough Wood. There is also a hugely popular linear walk to Mahon Falls, which is widely promoted as an enjoyable, accessible walk. The proposed car park will improve the overall visitor experience;
- The improvement will facilitate safe access; reduce congestion at busy times and will provide safer and easier access for emergency services;
- EV charging points.

6 SUBMISSIONS AND RESPONSES

The public consultation process under Part 8 of the Planning and Development Regulations 2001, as amended, commenced with a public notice in the Dungarvan Leader local newspaper on the 28th July 2021 and on the Council's website. Plans and particulars of the proposal were available for inspection by the public for a period beginning on the 28th July 2021 to 24th August, 2021. Submissions were to be submitted before 4.00p.m. Tuesday 7th September, 2021

A summary of the main issues raised in the submissions are set out as follows:-

TABLE OF SUBMISSIONS

No.	Submission made by	Summary of Issues Raised	Response
1	Colin Chapman	<ul style="list-style-type: none"> • The proposal should strive to maintain a rural aspect with a strong focus on the planting of trees. Questions the need for 129 spaces as they are not filled during peak hours since the easing of restrictions. • The site should be fenced by dry stone walls with designated entry and exit points with rustic wooden gates and posts. • Parking area should be softened in appearance by use of gravel rather than tarmacadam. • Provision of bus parking/pull in is unnecessary as people visiting the area are travelling in their own cars. • Council needs to address the increased litter and high speed traffic. 	<ul style="list-style-type: none"> • The car park proposed is to cater for existing demand and future demand within the surrounding area, and connectivity with other amenity areas and greenway, it is part of the overall integrated management strategy. • The boundary dry stone wall recently removed is to be reused within this proposed site. • Similar macadam surface with tar and chip surface finish is to be used and is currently at greenway car parks. • The purpose of a bus parking area, is to allow for visitors to be transported by bus to and from this location and can be used to link to other area within the Comeragh uplands as a park and ride drop area. • The Council supports and encourages the 'Leave No Trace' principles, we currently have many amenity areas across the County which are frequently used and we do not provide bins at these locations. Generally they are kept clean and tidy by the general public. Speeding within a public roadway and area is to be enforced by Gardaí.
2	Naomi A. Coad-Maenpaa	<ul style="list-style-type: none"> • I would like to object to this plan. An area of natural beauty and proposal is too large with excessive use of hard landscaping. • Proposed wetland area will just be a hazard for children and will not attract many insects as it is surrounded by hard landscaping. 	<ul style="list-style-type: none"> • The proposal incorporates significant screening and planting. • The proposed ecological area is a low risk area. Planting within proposed site is to include biodiversity planting as part of landscape plan.
3	Cllr Liam Brazil	<ul style="list-style-type: none"> • In support of this proposed development. A lot of congestion at present due to large number of visitors and the carpark will be of great help in this regard. • This will also benefit the intention to link Mahon Falls to the Greenway via the Crough 	<ul style="list-style-type: none"> • The Council acknowledges your support for this proposal. • The Sculpture concept can be considered in the future subject to funding.

		<p>Woods.</p> <ul style="list-style-type: none"> • A sculpture in the carpark of a horse and blacksmith to acknowledge the history of a forge in this area for hundreds of years would be welcome. 	
4	Elisabeth, Uwe & Valeska Kroeger	<ul style="list-style-type: none"> • We object to the proposed plan. Since existing car spaces were created several car parking spaces are always available. • Issue of safety for children and adults as the carpark will not be enclosed. • Loss of unique rural appeal/view from coffee shop. • Would it be more beneficial if parking was created in Kilmacthomas and take people by bus to other areas. • Creation of 129 spaces without toilet facilities. • Reinstate the dry stone wall on all sides of the triangle, with more planting of trees/shrubs. 	<ul style="list-style-type: none"> • The car park has one traffic access point and three pedestrian access points with chicane system, similar access design have been used along Waterford greenway in close proximity to roads. In delivery of this project, all environmental and safety issues will be taken into consideration. • The proposal entails soft and hard landscape, reuse of stone walls, gravel pathways, wetlands, timber fencing • The car park proposed is to cater for existing demand and future demand within the area, the long term plan is to have an integrated bus link with other amenity areas and greenway within the Comeragh Upland region, it is part of the overall integrated management strategy. • The provision of a toilet facilities will be explored and considered by Waterford Council in the future and is subject to funding. • The boundary dry stone wall removed recently from side roads is to be reused and retained within car par area. • The proposal incorporates screening and planting.

5	Julie Green (Photos supplied)	<ul style="list-style-type: none"> • It is extremely important that the finished area should be in keeping with rural environs in terms of material used, surfaces, and planting and features. • Should be an aim to increase the overall biodiversity despite this, by planting a large number of native species of trees, shrubs and herbaceous plants that are good for pollinators. • Number of car parks seems excessive as high use is over a very limited period. Use may fall in post-covid times and already has. Planted areas could be increased if car parking spaces reduced, eg removing the 29 parking spaces surrounding the central wetland area- to either increase wetland area or create area surrounding it for trees, or removing the 8 spaces in corner opposite café. • Car park could be compacted and gravelled rather than tarmac as this has a very negative visual impact on this rural area. • Trees could be planted between car spaces - in gaps in hard surface left for this, without reducing car parking space. (please see an example of this in picture attached) This would add to biodiversity and also decrease visual impact of carpark. • Keep paths to a minimum and increase planting for pollinators • The car park will increase traffic on what is already a very busy section of road with 2 junctions with poor visibility and it is absolutely vital that the speed limit is reduced well before Mahon Bridge in both directions on the Carrick/Lemybrien road. • The sign with directions to Lemybrien/Kilmacthomas/Killrossanty on the R676 opposite the proposed car park completely blocks the view to see oncoming traffic both from the road which approaches coming from McGraths cross and also from the junction approaching from Fewes. This sign needs to be removed. 	<ul style="list-style-type: none"> • The boundary dry stone wall removed recently from side roads is to be reused and retained within car park. The proposal incorporates screening and planting. • The project will incorporate a trees, plants and biodiversity planting. • The car park proposed is to cater for existing demand and future demand within the area, and future connectivity with other amenity areas and greenway is likely to require reduction in existing car parking spaces; this is part of the overall integrated management strategy. • The macadam with tar and chip surface is similar design that is at greenway car parks. The pedestrian pathways will be compacted permeable material • Not in favour of planting trees within or close to the car parking area as it may cause a safety issue and obscure visibility. Trees will be planted elsewhere within the scheme perimeter. • Pathways to provide a safe link within the site and have adjacent planting incorporated. • A reduced speed limit will be given consideration in next speed limit review stage. • Signs to be placed at required visibility height to meet standards
6	Cllr Declan Clune	<ul style="list-style-type: none"> • I fully support this part 8. The addition of 129 spaces close to such a special amenity that is Crough Wood will enhance the offering and together with the provision for a bus stop and set down area will mean safe parking for all users of the area. • In recent times it had become quite dangerous in the area due to the lack of parking. The popularity of the outdoors has grown since Covid and the secret of Mahon Bridge/Crough Wood got out! • I hope it is a model we may be able to roll out to other areas such as Bonmahon or Kilmurrin to help alleviate peak traffic in those areas also. 	<ul style="list-style-type: none"> • The Council acknowledges your support for this proposal.

7	Irish Water (Yvonne Harris Connections and Developer Services)	<ul style="list-style-type: none"> • IW has no objection in principle to the proposed development but requests that the grant of permission be conditioned as follows:- • Any proposals to divert or build over any existing water or wastewater services shall be submitted to IW for written approval prior to commencement. • Separation distances between any existing IW assets and proposed structures, other services, trees etc have to be in accordance with the IW Codes of Practice and Standard Details. • Where the applicant proposes to connect to public water/wastewater mains operated by IW, the applicant shall sign a connection agreement with IW prior to the commencement of the development and adhere to the standards and conditions set out in that agreement. • All development shall be carried out in compliance with IW Standards codes and practices to ensure adequate provision of water and wastewater facilities. 	<ul style="list-style-type: none"> • The Council acknowledges that you have no objection to this proposal and notes conditions to any changes in water services within this site and compliance to Irish Water codes and conditions.
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7 CONCLUSION

The proposed works are needed for the following reasons:

- To cater for parking at this location and to avoid parking at the entrances and allow for safe off road parking;
- The car park proposed is to cater for existing demand and future demand within the area, and future connectivity with other amenity areas and greenway as part of the overall integrated management strategy;
- Allow for safe access via a pathway from the car park to the beginning of the trail and access businesses within the area;
- Dedicated set down area to promote park and ride facility;
- Improve recreational facilities with new picnic benches and bike parking;
- Allow for disability access and parking;
- The proposed pathway with biodiversity planting elements and wetlands are within this site will contribute to the local biodiversity and provide suitable forage for pollinators;
- Retain existing features like the stone depot and water pump and reuse stone wall road from local side roads within this site;
- The car park development will be positive for residents and businesses within the immediate environs of the proposed car park, and also visitors to the area by providing a dedicated parking area and seating area;
- The proposed car park will improve the overall visitor experience;

- The improvement will facilitate safe access; reduce congestion at busy times, safer and provide easier access for emergency services.

8 RECOMMENDATION

In conclusion, it is the Council's opinion that the proposed works will address the parking needs. The planting elements within wetlands and pathway within this site will contribute to the local biodiversity on site and overall it is the optimum solution available.

It is recommended that the works as proposed and as set out in Appendix C should proceed as advertised and your approval is requested.

**Fergus Galvin,
Director of Services,
Roads, Water and Environment.**

Habitats Directive Project Screening Assessment

Table 1: Project Details

Development Consent Type	Local Authority Works
Development Location	Mahon Bridge
File Ref	
Description of the project	Development of Car Park

Table 2: Identification of Natura 2000 Sites (SACs and SPAs) which may be Impacted by the proposed development

Please answer the following five questions in order to determine whether there are any Natura 2000 sites which could potentially be impacted by the proposed development.

Impacts on SACs		
1	<p>Impacts On Freshwater Habitats <i>Is the development within a Special Area of Conservation whose qualifying interests include freshwater habitats, or in the catchment of same?</i></p> <p>Sites to consider: Blackwater River, Lower River Suir Habitats to consider: Rivers, Lakes and Lagoons</p>	No
2	<p>Impacts On Wetland Habitats <i>Is the development within a Special Area of Conservation whose qualifying interests include wetland habitats, or within 1 km of same?</i></p> <p>Sites to consider: Comeragh Mountains Habitats to consider: Bogs, Fens, Marshes and Wet Heaths.</p>	No just over 1km south of the Comeragh Mountains SAC.
3	<p>Impacts on Intertidal and Marine Habitats <i>Is the development located within a Special Area of Conservation whose qualifying interests include intertidal and/or marine habitats and species, or within the catchment of same.</i></p> <p>Sites to consider: Tramore Dunes and Backstrand, River Suir (Tidal Section), River Blackwater (Tidal Section), Waterford Estuary Habitats to consider: Mudflats, Sandflats, Saltmarsh, Estuary; Shingle, Reefs, Sea Cliffs.</p>	No
4	<p>Impacts On Woodlands , Grasslands and Dry Heaths <i>Is the development within a Special Area of Conservation whose qualifying habitats include woodlands or grasslands habitats, or within 200m of same.</i></p> <p>Sites to consider: Glendine Wood Nire Valley Woods, Ardmore Head, Helvick Head Habitats to consider: Woodlands, Grasslands or Dunes.</p>	No
5	<p>Impacts On Birds <i>Is the development within a Special Protection Area, or within 1 km of same.</i></p> <p>Sites to consider: Tramore Backstrand, Dungarvan Bay, Blackwater Callows, Blackwater Estuary, Helvick Head – Ballyquin Coast, Mid Waterford Coast</p>	No

Conclusion Table 2:

If the answer to all of these questions is **No**, significant impacts can be ruled out for Natura 2000 sites. No further assessment is required, proceed to the Habitats Directive Conclusion Statement.

If the answer to any of these questions is **Yes** please refer to tables 3 and 4 below.

Table 3: Determination of Possible Impacts On Natura 2000 Sites.

Where it has been identified that there is a Natura 2000 site within the potential impact zone of the proposed development, it is necessary to try to determine the nature of the possible impacts. Please answer the following questions as appropriate.

1	Impacts on designated freshwater habitats (rivers, lakes streams and lagoons).	
	Sites to consider: Blackwater River, Lower River Suir	
	<i>Please answer the following if the answer to question 1 in table 2 was yes.</i>	
	<i>Does the development involve any of the following:</i>	
	Works inside the boundary of designated site	
1.1	All works within the boundary of any SAC whose qualifying features include freshwater habitats/species, excluding small extensions/alterations to existing buildings.	
	Works outside the boundary of designated site	
1.2	Discharge to surfacewater or groundwater within the boundary of an SAC whose qualifying features include freshwater habitats/species.	
1.3	Abstraction from surfacewater or groundwater within 1km of the boundary of an SAC whose qualifying features include freshwater habitats or species.	
1.4	Removal of topsoil within 100m of the boundary of an SAC, whose qualifying features include freshwater habitats/species.	
1.5	Infilling or raising of ground levels within 100m the boundary of any SAC whose qualifying features include freshwater habitats/species.	
1.6	Construction of drainage ditches within 1km of the boundary of an SAC whose qualifying features include freshwater habitats/species.	
1.7	Installation of waste water treatment systems; percolation areas; septic tanks within 100 m of the boundary of an SAC site whose qualifying features include freshwater habitats/species.	
1.8	Construction within a floodplain of EU designated watercourse whose qualifying features include freshwater habitats/species.	
1.9	Crossing or culverting of rivers or streams within 1km of the boundary of any SAC whose qualifying features include freshwater habitats.	
1.10	Storage of chemicals hydrocarbons or organic wastes within 100 m of the boundary of an SAC whose qualifying features include freshwater habitats/species.	
1.11	Development of a large scale, within catchment of an EU designated watercourse or waterbody, which involves the production of an EIS.	
1.12	Development or expansion of quarries within catchment of an EU designated watercourse or waterbody.	
1.13	Development or expansion of windfarms within catchment of an EU designated watercourse or waterbody.	
1.14	Development of pumped hydro electric stations within catchment of an EU designated watercourse or waterbody.	
2	Impacts On Wetland Habitats	
	<i>Is the development within a Special Area of Conservation whose qualifying interests include wetland habitats, or within 1 km of same?</i>	
	Sites to consider: Comeragh Mountains	

	<p>Habitats to consider: Bogs, Fens, Marshes and Wet Heaths.</p> <p><i>Please answer the following if the answer to question 2 in table 2 was yes.</i></p>	
	Works inside the boundary of designated site	
2.1	All works within the boundary of an SAC whose qualifying features include heath, marsh, fen or bog, excluding small extensions/alterations to existing buildings.	No
	Works outside the boundary of designated site	
2.2	Construction of roads or other infrastructure on peat habitats within 1km of any SAC whose qualifying features include heath, marsh, fen or bog.	No
2.3	Development of a large scale within 1km of any SAC, whose qualifying features include heath, marsh, fen or bog, which involves the production of an EIS.	No
3	<p>Impacts on Intertidal and Marine Habitats <i>Is the development located within a Special Area of Conservation whose qualifying interests include intertidal and/or marine habitats and species, or within the catchment of same.</i></p> <p>Sites to consider: Tramore Dunes and Backstrand, River Suir (Tidal Section), River Blackwater (Tidal Section), Waterford Estuary</p> <p><i>Please answer the following if the answer to question 1 in table 3 was yes.</i></p>	
	Works inside the boundary of designated site	
3.1	All works within the boundary of any SAC whose qualifying features include intertidal or marine habitats, excluding small extensions/alterations to existing buildings.	
	Works outside the boundary of designated site	
3.2	Coastal protection works within 5km of any SAC whose qualifying features include intertidal or marine habitats.	
3.3	Development of piers, slipways, marinas, pontoons or any other infrastructure within 5km of any SAC whose qualifying features include intertidal or marine habitats.	
3.4	Dredging within 5km of any SAC whose qualifying features include intertidal or marine habitats.	
3.5	Works within 1km of any SAC whose qualifying features include intertidal or marine habitats, which will result in discharges to rivers or streams directly connected to the designated site.	
3.6	Infilling of coastal habitats within 500m of any SAC whose qualifying features include intertidal or marine habitats.	
3.7	Removal of topsoil or infilling of terrestrial habitats within 100m of any SAC whose qualifying features include intertidal or marine habitats.	
3.8	Development of a large scale within 1km of any SAC whose qualifying features include intertidal or marine habitats, which involves the production of an EIS.	
4	<p>Impacts on other designated woodlands and grasslands (woodland, upland grassland, lowland grassland, coastal grassland including dunes).</p> <p>Sites to consider: Glendine Wood Nire Valley Woods, Ardmore Head, Helvick Head <i>Please answer the following if the answer to question 4 in table 2 was yes.</i></p> <p><i>Does the development involve any of the following:</i></p>	
	Works inside the boundary of designated site	
4.1	All works within the boundary of any SAC whose qualifying interests include woodland or grassland habitat types excluding small extensions/alterations to existing buildings.	

	Works outside the boundary of designated site	
4.2	Development within 200m of any SAC whose qualifying interests include woodland or grassland habitat types.	
4.3	Development of a large scale within 1km of any SAC, whose qualifying interests include woodland or grassland habitat types, which involves the production of an EIS.	
5	Impacts on birds in SPAs Sites to consider: Tramore Backstrand, Dungarvan Bay, Blackwater Callows, Blackwater Estuary, Helvick Head –Ballyquin Coast, Mid Waterford Coast <i>Please answer the following if the answer to question 5 in table 2 was yes.</i> <i>Does the development involve any of the following:</i>	
	Works inside the boundary of designated site	
5.1	All works within the boundary of any SPA excluding small extensions/alterations to existing buildings.	
	Works outside the boundary of designated site	
5.2	Erection of wind turbines within 1km of any SPA.	
5.3	All construction works within 100m of any SPA.	
5.4	Infilling of coastal habitats within 500m of intertidal SPA.	
5.5	Works within 1km of coastal/wetland SPAs which will result in discharges to rivers or streams that are directly connected to designated sites.	
5.6	Development of cycleways or walking routes within 100m of SPAs.	
5.7	Construction works on feeding areas adjacent to SPAs	

Conclusion Table 3: If the answer to all of the above is no or n/a, significant impacts on Natura 2000 sites can be ruled out. No further assessment is required, proceed to the Screening Conclusion Statement. If the answer to any question in table 3 is yes, you may require further information, unless you are satisfied that the project proponents have incorporated adequate mitigation into their design to avoid impacts on the Natura 2000 site (e.g. water pollution protection measures). Such information should be provided in the form of a Natura Impact Statement which should address the particular issues of concern as identified through the above.

Table 4: Consideration of Potential Impacts on Protected Species

Many of our Special Areas of Conservation are designated for species as well as for habitats. These are listed below, alongside the sites for which they are designated. Included is a short list of the types of activities which could have an impact on these species. Please tick if you are concerned that the proposed development could have an impact on these species.

Species	Relevant Sites	Activities which could have impacts on species	Possible Impacts Identified? Y/N
Otter	Lower River Suir River Blackwater Waterford Estuary	Activities that interfere with river banks.	No
Bats (all species outside designated sites)	Blackwater River, Lower River Suir, Waterford Estuary Glendine Wood, Lismore Woods Nire Valley Woods Along with above, in general all sites with any of the following; woods, mature treelines and hedgerows, old buildings and bridges	Activities that result in loss of woodland or hedgerow habitat or causes disturbance to roost sites. Renovations of old buildings; Repointing of old bridges.	No
Salmon	Lower River Suir River Blackwater	Activities that interfere with water quality, levels or the river bed;	No

Species	Relevant Sites	Activities which could have impacts on species	Possible Impacts Identified? Y/N
	Waterford Estuary		
River Lamprey	Lower River Suir River Blackwater Waterford Estuary	Activities that interfere with water quality, levels or the river bed;	No
Brook Lamprey	Lower River Suir River Blackwater Waterford Estuary	Activities that interfere with water quality, levels or the river bed;	No
Sea Lamprey	Lower River Suir River Blackwater Waterford Estuary	Activities that interfere with water quality or the river bed – estuarine areas;	No
Twaite Shad Allis Shad	Lower River Suir River Blackwater Waterford Estuary	Activities that interfere with water quality or the river bed – estuarine areas;	No
White-clawed Crayfish	Lower River Suir River Blackwater Waterford Estuary	Activities that interfere with water quality or the river bed;	No
Freshwater Pearl Mussel	Lower River Suir River Clodiagh River Lickey River Blackwater	Activities that interfere with water quality, levels or the river bed ;	No
Whorled Snail <i>Vertigo moulinsiana</i>	River Blackwater	Activities that result in loss of fen, marsh or wet grassland habitat within or close to the SAC.	No
Killarney Fern	Glendine Wood Lismore Woods (River Blackwater)	Woodland clearance or other activities resulting in loss or disturbance to woodland habitat within the relevant SACs.	No

Conclusion Table 4: If the answer to all of the above is no, significant impacts on species can be ruled out. If the answer to any of the above is yes, then further information is likely to be required in relation to potential for impact on that particular species. Where potential impacts on the above listed species are within designated sites, then further information should be sought in the form of a Natura Impact Statement. Where impacts are outside designated sites, then a species specific survey should be requested.

Habitats Directive Screening Conclusion Statement

Development Type	Local Authority Works Car Park
Development Location	Mahon Bridge
Natura 2000 sites within impact zone	Site south of the Comeragh Mountains SAC (1.2km)
Planning File Ref	
Description of the project	Construction of car park to support visitor access to walkway from Mahon Bridge to Crough Wood. Car parking will also serve the local coffee shop.
Describe how the project or plan (alone or in combination) could affect Natura 2000 site(s)	Increased visitor numbers to the area could increase footfall in the Comeragh Mountains SAC causing trampling and erosion.
If there are potential negative impacts, explain whether you consider if these are likely to be significant, and if not, why not.	A walking trail exists between Mahon Bridge and Crough Wood leading northwards towards a Coillte plantation site. The pandemic year saw increased user numbers to the trail with associated need for car parking facilities at Mahon Bridge. The majority of walkers confine their walk to this route but some walkers continue along the River Mahon within the Comeragh Mountains site. This unofficial trail is the subject of a remediation plan being implemented by

Waterford City and County Council under the guidance of NPWS. It is not considered the proposed car park will give rise to additional footfall in the Comeragh Mountains SAC to a level that is significantly increased beyond current user levels as there are several other access points to the Comeragh Mountains north of the proposed car park site towards Mahon Falls. Car parking at Mahon Bridge currently takes place along the roadsides around the site and due to increased traffic to both the cafe and Mahon Bridge to Crough Wood Walk a dedicated car park is required to service this demand. The car park in itself will not cause loss of ecological footprint from the Comeragh Mountains SAC.

Conclusion of assessment

Development of the car park is on a site outside the Comeragh Mountains SAC and is proposed to support the increased user numbers to the Mahonbridge- Crough Wood Walk. The development will not cause significant effects to the conservation objectives of the Comeragh Mountains SAC.

Documentation reviewed for making of this statement.

WCCC Internal GIS

Completed By	Bernadette Guest
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Date	9 th July 2021
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Map 1. Location of proposed car park south of the Comeragh Mountains SAC



Image 1. Aerial view of proposed car park site at Mahon Bridge

Development of Car Park at Mahon Bridge Environmental Impact Assessment Screening Report

1. Introduction

The EIA Directive 85/337/EEC, as amended aims to determine the likely significant effects of a project on the environment. EIA Screening determines whether an EIA is required for a specified project. Projects requiring mandatory EIA are listed in Schedule 5 of the Planning and Development Regulations 2001, as amended. In the case of development which is under these thresholds, planning authorities are required under Article 103 of the 2001 Regulations, (as amended) to request an EIAR where it considers that the proposed development is likely to have a significant effect on the environment.

Under Schedule 5 of the Planning and Development Regulations 2001 (as amended), the proposed development is sub-threshold for EIA. The proposed development is being screened as per Schedule 7 of the regulations to determine if there is likely to be significant effects on the environment. Screening involves appraisal of impacts from the proposed development according to three main criteria:-

1. Characteristics of the proposed development
2. Location of proposed development
3. Characteristics of potential impacts.

Schedule 6 of the Planning and Development Regulations, 2001 (as amended), outlines the aspects of the environment likely to be significantly affected by a proposed development. These are: human beings, flora and fauna, soil and geology, water, air & climate, landscape, material assets, cultural heritage and the inter-relationships between the range of environmental criteria. EIA screening involves assessment of these criteria to determine if the proposed development is likely to significantly affect the environment.

2. Screening Assessment

Table 1. Characteristics of proposed development

Is the size and design of the proposed works significant ?	No, .5 ha.
Use of natural resources in particular land, soil, water and biodiversity ?	Proposed works involve surfacing of a .5ha field comprising semi-improved/wet grassland bounded by a stonewall with vegetation.
Will the works produce waste ?	Demolition and construction waste during development works.
Will the works create a significant amount of pollution or nuisance ?	Traffic management will cause small scale and temporary inconvenience for road users during development works.

Risk of major accidents and/or disasters relevant to the project including those caused by Climate Change in accordance with scientific knowledge ?	Works will be governed by a health and safety statement. Providing best practice is followed the risk of accidents which are significant in scale is considered low.
Risks to human health (water contamination , air pollution)	Works will be governed by a health and safety statement. Providing best practice is followed the risk to human health is considered low.
Potential for cumulative impacts with other existing and/or approved projects?	Extension of existing car park and laybys on ring road to Mahon Falls currently under consideration by An Bord Pleanála. The area was subject to increased year round visitor usage in 2020-2021 due to the pandemic.
Potential for combination of above factors to have significant effects	It is not considered the proposed car park will give rise to additional footfall in the Comeragh Mountains SAC to a level that is significantly increased beyond current user levels as there are several other access points to the Comeragh Mountains north of the proposed car park site towards Mahon Falls. Car parking at Mahon Bridge currently takes place along the roadsides around the site and due to increased traffic to both the cafe and Mahon Bridge to Crough Wood Walk a dedicated car park is required to service this demand.

Table 2. Location of Proposed Development

Environmental sensitivity of project in relation to existing and approved land use.	The site is 1.2km south of the nearest SAC- Comeragh Mountains and is outside the flood zone of the River Mahon.
Relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground.	Proposed works involve surfacing of a .5ha field comprising semi-improved/wet grassland bounded by a stonewall.
Absorption capacity of the natural environment including wetlands, riparian areas, river mouths, coastal zones and the marine environment, mountain and forest area.	The development will incur loss of .5ha of semi-improved/wet grassland. The proposed design will incorporate a wetland soakway and tree planting .
Potential of works to impact directly or indirectly on sites designated for nature conservation (NHA/SAC/SPA)	The site is 1.2km south of the nearest SAC- Comeragh Mountains. AA screening has been carried out and has concluded no potential for significant effects.
Potential for impacts directly or indirectly on Habitats or Species listed on Annex 1 of the Habitats Directive	AA screening has been carried out and has concluded no potential for significant effects. The works will not cause loss of habitat from the ecological footprint of the

	Comeragh Mountains SAC.
Potential for impacts directly or indirectly on Species listed on Annex IV of the Habitats Directive	No
Potential for impacts on breeding places of any species protected under the Wildlife Act ?	No
Potential to impact directly or indirectly on any listed ACA in the County Development Plan ?	No
Potential to impact directly or indirectly on any protected structure or recorded monuments and places of Archaeological Interest	There are two features of built heritage interest in the site a water pump and a stone depot.
Potential to impact directly or indirectly on Listed or scenic views or protected landscape in the County Development Plan ?	Mahonbridge is an area classified as a scenic route in the Waterford Scenic Landscape Evaluation. Scenic routes indicate public roads and viewing points from which views and prospects of areas of natural beauty and interest can be enjoyed. Sightseeing visitors are more likely to be concentrated along these routes. Development in the environs of a scenic route should demonstrate that there will be no obstruction or degradation of the views towards visually vulnerable features nor significant alterations to the appearance or character of sensitive areas. The works will incur loss of .5ha of semi-improved/wet grassland bounded by a stone wall. The proposed design will incorporate a wetland soakway and tree planting to screen the car park.
Potential to impact on areas in which there has already been a failure to meet the environmental quality standards and relevant to the project, or in which it is considered that there is such a failure.	A walking trail exists between Mahon Bridge and Crough Wood leading northwards towards a Coillte plantation site. The pandemic year saw increased user numbers to the trail with associated need for car parking facilities at Mahon Bridge. The majority of walkers confine their walk to this route but some walkers continue along the River Mahon within the Comeragh Mountains site. This unofficial trail is the subject of a remediation plan being implemented by Waterford City and County Council under the guidance of NPWS. It is not considered the proposed car park will give rise to additional footfall in the Comeragh Mountains SAC to a level that is

	significantly increased beyond current user levels as there are several other access points to the Comeragh Mountains north of the proposed car park site towards Mahon Falls. Car parking at Mahon Bridge currently takes place along the roadsides around the site and due to increased traffic to both the cafe and Mahon Bridge to Crough Wood Walk a dedicated car park is required to service this demand. The car park in itself will not cause loss of ecological footprint from the Comeragh Mountains SAC.
Potential to impact on densely populated areas.	The site is located in a rural area and will cause temporary inconvenience for road users during development works.

Table 3. Characteristics of Potential Impacts

Human Beings	Noise and traffic disruption will cause a small scale temporary impact for local residents.
Flora and Fauna	The development will incur loss of .5ha of semi-improved/wet grassland. The proposed design will incorporate a wetland soakway and tree planting .
Soils and Geology	No protected geological heritage sites will be affected.
Water	The nearest watercourse to the site is the River Mahon. The site is outside the flood zone of the river and a wetland soakway is being incorporated as part of the design.
Air & Climate	The nearest air quality monitoring stations are in Waterford and Clonmel. EPA monitoring demonstrate compliance with the Air Quality Standards limit values for all pollutants with air quality classed as “good”.
Noise & Vibration	Works will cause a temporary impact for local residents with noise but will be temporary and short term in nature.
Landscape	Mahonbridge is an area classified as a scenic route in the Waterford Scenic Landscape Evaluation. The surfaced car park will be screened by tree planting.
Material Assets	Works will be subject to and regulated by a waste management plan.
Cultural Heritage	There are two features of built heritage interest in the site a water pump and a stone depot. Recessed stone depots found alongside the former National Primary and Secondary

	<p>routes are a part of County Waterford’s heritage which appears to be unique to the county but which most people seem to be unfamiliar with are the. These 19th-century stone depots are a prominent feature of the county’s landscape. The main roads built during the 19th-century had the depots placed along the road with a distance of one furlong (one eighth of a mile), to accommodate the stonebreakers who manually crushed rocks into rubble to be used in the construction of the roads. In the mid-19th century the army was responsible for the planning of these roads while the building of the roads was then undertaken by the Grand Jury, the forerunner for the local authority by whom they were replaced in 1899. The landowners on whose lands the roads were built were commissioned by the Grand Jury to supply the road builders with stones. Each depot would have two stonebreakers, one working with a sledgehammer and the other with a lump hammer. The overseer would then check the stones for size with a ring. If a stone was too big to pass through the ring it then would be crushed again. The rubble was then shovelled onto the road. The road between Leamybrien and Carrick-on-Suir took 5 years to build, beginning c.1840. The stonebreakers along the roads were phased out at the beginning of the 20th-century with the introduction of the steampowered stonebreakers.</p>
Interaction of Foregoing	The main effects identified are change from semi-natural grassland to built surface and loss of stone wall boundary.

Table 4. Discussion of Potential Impacts

Will a large geographical area be impacted as a result of the proposed works ?	No, .5 ha.
Will a large population be impacted as a result of the proposed works ?	No, site is in a low population area. Works will cause a temporary impact for road users but will be temporary in nature.
Are any trans-frontier impacts likely to arise from proposed works?	No
Is the magnitude of impacts associated with the proposed works considered significant ?	No

Is the intensity and complexity of impacts associated with the proposed works considered significant ?	No
Is there a high probability that the effects will occur ?	Yes
Will the effects continue for a long time ?	Yes permanent but change from grassland to hard surface can be addressed by biodiversity mitigation measures.
Will the effects be permanent rather than temporary ?	Yes permanent but can be addressed by biodiversity mitigation measures.
Will the impacts be irreversible?	The development will sustain and regenerate two features of built heritage interest- water pump and stone depot.
Will it be difficult to avoid, or reduce or repair or compensate for the effects ?	The works will incur loss of .5ha of semi-improved/wet grassland bounded by a stone wall. The proposed design will incorporate a wetland soakway and tree planting to screen the car park. The design shall incorporate retention of the water pump and stone depot.

3 Conclusion

The DoEHLG Guidance Document “Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding Sub-Threshold Development” notes that *“The greater the number of different aspects of the environment which are likely to be affected and the greater the links between the effects, the more likely it is that an EIS should be carried out. Where complexity of impacts is deemed to apply in the case of a specific sub-threshold development proposal, there should be a predisposition towards the preparation of an EIS”*.

In consideration of the above involving appraisal of characteristics and location of proposed development and characteristics of potential impacts it is noted that the key environmental receptors to be affected are built heritage and landscape. The proposed design will incorporate a wetland soakway and tree planting to screen the car park and also retention of the water pump and stone depot.. It is concluded that an EIAR is not required for the proposed development.



Image 1. Stone Depot to be retained



Image 2. Water Pump to be retained

APPENDIX C

MAP OF MAHON BRIDGE CAR PARK DESIGN

