

CONSULTANTS IN ENGINEERING, ENVIRONMENTAL SCIENCE & PLANNING

# GRAND CANAL GREENWAY PHASE 2: ADDITIONAL BRIDGES

**EIA Screening** 

**Prepared for:** 

**Kildare County Council** 



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## GRAND CANAL GREENWAY PHASE 2: ADDITIONAL BRIDGES EIA SCREENING REPORT

#### REVISION CONTROL TABLE, CLIENT, KEYWORDS AND ABSTRACT

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Abstract: This EIA Screening Report has been prepared to provide additional information in

support of the proposed development of 2 new pedestrian bridges on the Grand Canal Greenway Phase 2. The proposed bridges will allow greenway users to more safety cross the canal and are located one in Lowtown, and the second adjacent to the existing

Healy's/Bonynge Bridge in Co. Kildare.

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#### 1. DESCRIPTION AND KEY CHARACTERISTICS OF DEVELOPMENT

#### 1.1 Project Context

The proposed Grand Canal Greenway is a 38.5km walking and cycling facility in Co. Kildare which follows the route of the existing Grand Canal towpath. The towpath stretches from Kildare's border with Dublin to Kildare's border with Offaly and runs through the following townlands; Lyons, Clonaghlis, Tipperstown, Ardclough, Boston, Clownings, Baronrath, Keeloges, Alasty, Killeenmore, Kileenbeg, Sherlocktown, Kerdiffstown, Sallins Osberstown, Waterstown, Burgettstown, Landenstown, Donore, Goatstown, Downings South, Moods Mylerstown, Robertstown, Lowtown, Derrymullen, Allenwood, Killinagh, Ballybrack, Kilpatrick, Ticknevin, Ballyhagan, and Clonkeen. It is intended that the Grand Canal Greenway will eventually extend from Grand Canal Dock in Dublin to Shannon Harbour and that it will become an international Greenway of significance capturing the essence of rural Ireland. This will promote Kildare as a tourist destination and provide opportunities for new visitor growth as well as providing linkage between communities.

The Grand Canal Greenway consists of two phases. Phase 1 stretches from Aylmers Bridge on the Kildare-Dublin border to the proposed pedestrian bridge in Sallins, Co. Kildare. Phase 2 stretches from Sallins to Clonkeen on the Offaly border. Phase 1 of the greenway route is completed and has been open to the public since late 2023. Phase 2 has previously received Part VIII consent and is currently at the detailed design stage.

Kildare County Council (KCC) are seeking Part VIII planning approval for the addition of 2 pedestrian bridges to the scheme. The proposed additional bridges seek to improve on the safety and user experience for all. The proposed bridges will allow greenway users to move safely across the canal with one bridge located in Lowtown, and the second adjacent to Healy's/Bonynge Bridge in Co. Kildare.

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#### 1.2 Development Description - Overview

In the first location a new pedestrian bridge has been proposed at Lowtown circa 1km west of Robertstown, Co. Kildare. In this location the original route for the Grand Canal forced greenway users to cross the canal in Robertstown at Binns Bridge and continue on the northern bank along the L7073, before turning off and heading west toward Lowtown on the L7073-5 still on the northern canal bank.

Due to the tight bend radii, and high volume of HGV's on the L3073 it is not considered suitable to have a shared space for greenway users on this road. Due to constraints in the lands available, the bend radius of the road and the narrow width at Binns Bridge it is not possible to improve the safety of the original proposal by creating a segregated cycle and pedestrian lane adjacent to the L7073 in this location.

Instead, it is proposed that the greenway will continue westwards on the south bank of the canal. A new pedestrian bridge is proposed just west of the connection between the old barrow line and the grand canal. The new bridge at Lowtown will allow users to cross the old barrow line, where they may then cross the existing Fenton's bridge before continuing their journey westwards using the previously consented route along the north (north east) canal bank.

The proposed bridge at Lowtown will greatly improve the safety of this area of the Greenway by segregating greenway users from the traffic on the L3073 and avoiding the dangerous crossing at Binns bridge. In addition, the proposal will also provide improved connectivity between the Grand Canal Greenway and the Barrow Blue Way as well as providing additional recreational spaces for users to enjoy.



Figure 1-1: Proposed Additional Pedestrian Bridge at Lowtown 1km West of Robertstown

The proposed pedestrian bridge at Lowtown will be of similar form of construction as the pedestrian bridge recently constructed on the Grand Canal Greenway in Sallins. The proposed bridge will have a minimum 3.5m clearance to the canal water level below to allow for safe passage of canal boats. The pedestrian ramps required to allow greenway users to get up to the correct height above the canal will be constructed from reinforced earth and shall have a grass surface finish. The ramp width and gradient shall be designed to allow for universal access. The proposed bridge decking shall be a high friction buff coloured epoxy type surfacing. A 1.45m high painted steel parapet shall be provided to protect greenway users from the exposed edge.

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In the second location east of Robertstown it was originally proposed that Greenway users would use the existing road bridge (Healy's/Bonynge Bridge) to cross the canal. Due to the volume of road traffic, particularly HGV's, the poor sightlines, and the narrow road width on the existing Healy/Bonynge bridge it is not considered safe for cyclists and or pedestrians to use. A new pedestrian footbridge has therefore been proposed circa 180m east of the existing Healy's/Bonynge bridge. The proposed bridge will allow greenway users travelling west to cross the canal and continue their journey into Robertstown on the south bank by passing under the L7081 at Healy's/Bonynge bridge. This proposed change will significantly increase the safety and sense of security of greenway users and is considered a necessary amendment to the originally proposed route of the Grand Canal Greenway. While a one way traffic light system and traffic calming measures at the bridge were considered the proposal outlined below was considered to be by far the safer and more appropriate option for this location as the proposed arrangement will completely separate greenway and road users in this location, significantly increasing both safety and sense of security.

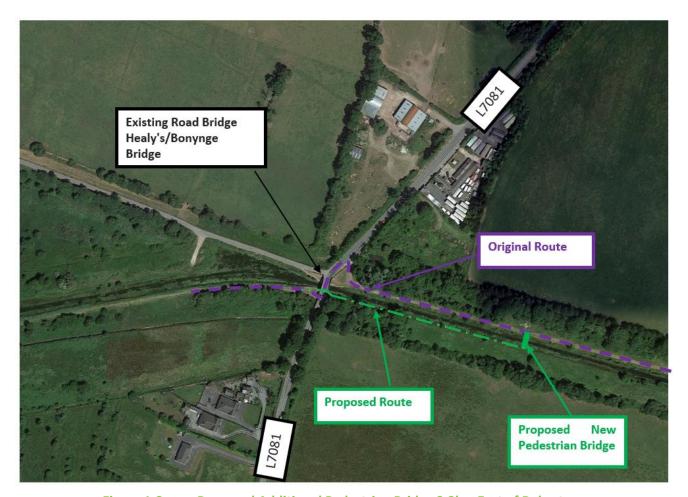


Figure 1-2: Proposed Additional Pedestrian Bridge 2.2km East of Robertson

The proposed pedestrian bridge in the second location will be of similar size and form of construction as the pedestrian bridge recently constructed on the Grand Canal Greenway in Sallins. The proposed bridge will have a minimum 3.5m clearance to the canal water level below to allow for safe passage of canal boats. The pedestrian ramps required to allow greenway users to get up to the correct height above the canal will be constructed from reinforced earth and shall have a grass surface finish. The ramp width and gradient shall be designed to allow for universal access. The proposed bridge decking shall be a high friction buff coloured epoxy type surfacing. A 1.45m high painted steel parapet shall be provided to protect greenway users from the exposed edge.

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The proposed pedestrian bridge location east of the existing road bridge has been chosen to make use of the existing natural clearing in that location, so as to minimize the site clearance and loss of vegetation required for the new bridge construction.

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#### 2. EIA SCREENING

#### Introduction

EIA is a means of drawing together an assessment of the potential significant environmental effects arising from a proposed development in a systematic way. It ensures that environmental implications of decisions on development proposals are taken into account before the decisions are made. The purpose of the screening report is to assist the competent authority, Kildare County Council to determine if EIA is required for this project.

This EIA Screening clearly demonstrates that the proposal will not give rise to any significant environmental effects that would warrant the carrying out of an Environmental Impact Assessment; as evident from the assessment, and reports from respective consultants submitted in support of the application.

#### 2.1 EIA Project Types and Legislative Basis

The European Union Directive 2014/52/EU on the assessment of the effects of certain public and private projects on the environment, requires member states to ensure that a competent authority carries out an assessment of the environmental impacts of certain types of projects, as listed in the Directive, prior to development consent being given for the project.

The EIA Directive requires that, "in order to ensure a high level of protection of the environment and human health, screening procedures and EIA assessments should take account of the impact of the whole project in question, including where relevant, its subsurface and underground, during the construction, operational and, where relevant demolition phases".

The Requirement for the EIA of various types of development are transposed into Irish legislation under the:

- Planning and Development Act and the Planning and Development (Amendment) Regulations 2001-2021. Schedule 5, Part 1 of the Planning Regulations includes a list of projects which are subject to EIA based on their type. Part 2 of the same schedule includes a list of projects which by reason of scale also fall into the EIA category.
- European Union (Roads Act 1993) (Environmental Impact Assessment)(Amendment) Regulations 2019. Section 5 amends Section 50 of the Roads Act 1993 as amended in respect of road developments that shall be the subject of an EIA. Article 8 of the Roads Regulations 1994 prescribe road development that shall be subject to an EIA.

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#### 2.2 Determining Whether EIA is Required

The Requirement for the EIA of various types of development are transposed into Irish legislation under Schedule 5, Part 1 of the Planning and Development Act and the Planning and Development (Amendment) Regulations 2001-2021, together with the Roads Act 1993, and Road Regulations 1994 as amended. These Acts and Regulations define a list of projects which are subject to mandatory EIA based on their type.

Reviewing the applicable Acts and Regulations, Schedule 5, Part 1 of the Planning and Development Act and the Planning and Development (Amendment) Regulations 2001-2021 specifies that an EIA must be completed for Infrastructure projects including car parks with 400 or more spaces. The proposed works does not include any additional new car parking spaces but does include some minor changes to an existing parking area with less than 10 spaces. The proposed development therefore does not trigger mandatory EIA under the above provision.

Schedule 5, Part 1 of the Planning and Development Act and the Planning and Development (Amendment) Regulations 2001-2021 specifies that an EIA must be completed for urban development projects which would involve greater than 2 hectares in the case of a business district, 10 Hectares in the case of other built-up areas and 20 hectares elsewhere.

The proposed works at Lowtown will occupy circa 2.3 hectares. In the second site adjacent to Healy's/Bonynge Road bridge the development will occupy 2.2 hectares. The overall development boundary includes the bridges plus elements of the greenway route, including sections of the greenway route previously submitted under planning application Ref No. P82018.012. Both sites are predominantly in a rural area and. As the combined total is far below the 20-hectare threshold, it therefore does not trigger mandatory EIA under the above provisions.

Schedule 5, Part 1 of the Planning and Development Act and the Planning and Development Regulations 2001 specifies that an EIA must be completed for changes and extensions, which would result in the development being of a class listed in Part 1 or results in an increase in size greater than 25 percent or, an amount equal to 50 per cent of the appropriate threshold whichever is greater. In this case the proposed development falls below these thresholds and therefore does not warrant a mandatory EIA under this condition.

With respect to the Roads Act 1993, and Road Regulations 1994 the proposed development does not include a bridge greater than 100m in length, nor does it fall into or above any of the other type or scale thresholds which would require a mandatory EIA under the Road Act 1993 and Road Regulation 1994.

Schedule 5 of the Planning and Development Act and the Planning and Development (Amendment) Regulations 2001-2021 also includes a section relating to 'sub threshold' (discretionary) EIA. This is where any project listed in Schedule 5 Part 2 which does not exceed a quantity, area or other limit specified in respect of the relevant class of development should be subject to EIA where the project would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7 of the Regulations. Therefore, whilst the project by virtue of its scale is minor in nature, applying the precautionary principle the project is screened for EIA below.

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#### 2.3 Sub-Threshold EIA Screening

This section of this report screens the project in the context of the criteria set out in Schedule 7 and Annex III of the EIA Directive. The screening demonstrates that there will be no significant impacts associated with the proposed development on the receiving environment in isolation or cumulatively with other projects or proposals in the area.

It is noted that the proposed scheme is a Local Authority own development and therefore, the requirement for sub-threshold EIA is addressed under Article 120 of the Planning and Development Regulations 2001, which states:

- a) Where a local authority proposes to carry out a subthreshold development, the authority shall carry out a preliminary examination of, at the least, the nature, size or location of the development.
- b) Where the local authority concludes, based on such preliminary examination, that:
- i. there is no real likelihood of significant effects on the environment arising from the proposed scheme, it shall conclude that an EIA is not required,
- ii. there is significant and realistic doubt in regard to the likelihood of significant effects on the environment arising from the proposed scheme, it shall prepare, or cause to be prepared, the information specified in Schedule 7A for the purposes of a screening determination, or
- iii. there is a real likelihood of significant effects on the environment arising from the proposed scheme, it shall— (I) conclude that the development would be likely to have such effects, and (II) prepare, or cause to be prepared, an EIAR in respect of the development

Annex III of the EIA Directive details the criteria to be used to determine whether a project should be subject to EIA and Schedule 7 of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 implements this Directive in Ireland.

This assessment utilises the Screening Checklist as detailed in the EU Guidelines to screen the proposed development with regard to EIA requirements and this checklist encompasses the details required under Annex III of the EIA Directive and in Schedule 7 of the 2018 EIA Regulations – refer to Table 2.1. Any potential impacts are then assessed with regard to their characteristics. In completing this screening assessment regard has also been had to EIA Screening Guidelines contained in the Office of the Planning Regulator's Practice Note PN02 Environmental Impact Assessment Screening.

In completing this screening assessment regard has also been had to EIA Screening Guidelines contained in the Office of the Planning Regulator's Practice Note PN02 Environmental Impact Assessment Screening.

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#### Table 2.1: Sub Threshold EIA Screening Checklist

Checklist Questions	Yes/No/Briefly describe	Is this likely to result in a significant impact? Yes/No/Why?
1. Will construction, operation, decommissioning or demolition works of the Project involve actions that will cause physical changes in the locality (topography, land use, changes in waterbodies, etc.)?	No, there will not be a change in land use resulting from the proposed scheme as the nature of this proposal meets the criteria within the designated use class of amenity in that it will be compatible with the availability of existing community amenity and recreational facilities for people at a convenient distance from their houses further acting as a contributor to health and wellbeing. Furthermore, this development proposal will also integrate and respect the visual quality of the Grand Canal amenity area. The enhancement of this existing phase 1 Grand Canal Greenway will exploit both the commuting potential as well as it's amenity and tourism value and has the potential to extend the amenity and recreational offer. Furthermore, the proposed scheme will contribute towards the enhancement of existing green infrastructure and preserve an existing public right of way accessing a canal bank. The proposed scheme is also designed to respect and not impact the surrounding land uses of 'Open, Space and Amenity' and 'Town Centre'. The proposed development will not change the use of the canal in the areas as the design will allow for its continued operation.	No, due to the scale of the development this is not likely to result in a significant impact.
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?	Natural resources will be used in terms of surfacing the cycleway and footpaths. Natural resources will be used in the form of materials for construction of the proposed bridges. Energy will be used to power construction machinery during the construction period.  The proposal will follow the existing pathway and natural resources will be used in terms of surfacing the cycleway and footpaths and construction of the proposed bridges. Construction material will be sourced locally, where possible, and where possible cut/fill will be balanced so the impact will not be significant. During the operational phase, only minor amounts of energy and materials will be used for regular maintenance activities.	No, due to the limited scale of the development and the existing pathway will not likely to result in a significant impact.

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Checklist Questions	Yes/No/Briefly describe	Is this likely to result in a significant impact? Yes/No/Why?
	The land required for the embankments is negligible in the context of the overall grazing/canal banks available and will utilize the existing Garnd Canal Greenway amenity walk.	
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. All materials used during construction are standard materials with associated best practice measures for the use of such – for example small scale concrete works, steel works etc.	No, this is not likely to result in a significant impact.
4. Will the Project produce solid wastes during construction or operation or decommissioning?	Yes. There will be some material waste during construction and decommissioning. All waste will be removed by a licenced waste operator and disposed of appropriately.	No, this is not likely to result in a significant impact. All waste will be removed by a licenced waste operator and disposed of appropriately.
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, this is not likely to result in a significant impact.
6. Will the Project cause noise and vibration or the releasing of light, heat energy or electromagnetic radiation?	During construction noise emissions will occur from construction plant and will be below the 63 dBLaeq threshold at nearest receptors. No heat energy or electromagnetic radiation will be released	No, levels of noise and vibration anticipated during construction are not likely to cause significant impact.
7. Will the Project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	No drainage for the proposed development will be designed in accordance with SUDS (Sustainable Urban Drainage Systems) manual to maintain existing water flows.	No, this is not likely to result in a significant impact with normal best practice construction practices and sustainable designed on site drainage.

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Checklist Questions	Yes/No/Briefly describe	Is this likely to result in a significant impact? Yes/No/Why?
8. Will there be any risk of accidents during construction or operation of the Project that could affect human health or the environment?	Yes. A Health and Safety Plan and emergency response procedures will be prepared to identify the hazards and ensure that the overall risks are mitigated down to a low level.	No, this is not likely to result in a significant impact with normal best practice construction practices implemented on site.
9. Will the Project result in environmentally related social changes, for example, in demography, traditional lifestyles, employment?	Yes, the proposed project will improve the safety and utility for greenway users and will therefore have a positive impact.	No significant negative impact is expected.
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 planned activities in the locality?	No. The proposed amendment and additional bridges are a proposed improvement to grand canal greenway which has been previously consented.	No. The project will not result in significant cumulative impacts with other projects.
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?	The following sites are within 15km: Ballynafagh Bog SAC (000391) Ballynafagh Lake SAC (001387) Mouds Bog SAC (002331) Red Bog, Kildare SAC (000397) Poulaphouca Reservoir SPA (004063) Pollardstown Fen SAC (000396)  Based on the site surveys and subsequent AA screening completed the proposed development will not have any significant impact on the sites listed above.	No. The lack of hydrological connection to designated sites and no likely in-combination effects, the project will not result in significant impacts.

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Checklist Questions	Yes/No/Briefly describe	Is this likely to result in a significant impact? Yes/No/Why?
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.	An ecological survey of the area has been completed. Due to the scale of the project the habitat loss is not considered to have a significant impact.	No. The project will not result in significant impacts.
13. Are there any areas 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, the Ballynafagh Lake SAC is located nearby the proposed development close to Bonynge Bridge. Among others, Ballynafagh Lake SAC is designated for Desmoulin's whorl snail (Vertigo Moulinsiana) which is listed in Annex II of the EU Habitats Directive. A survey of the proposed development area was completed in July 2023. Due to the lack of suitable habitat within or adjacent to the proposed development the conclusion of the survey and report was that the proposed development will not have any negative impact on the Vertigo Moulinsiana species.	No. The project will not result in significant impacts
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?	The Grand Canal inland waterway is located within the development boundary. The proposed development does not require instream works. A 1m wide vegetation buffer zone is required by Waterways Ireland between the canal edge and the Greenway. The proposed development is not expected to have any significant negative impact on the Grand Canal.	No. The project will not result in significant impacts
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 the area of development east of Roberstown is designated as Class 3 High Landscape Sensitivity under the Kildare County Development Plan 2023-2029. In addition, there is a scenic Viewpoint located at adjacent to the proposed development at Bonynge Bridge.	Impact on the landscape character of the area is considered to be slight and not significant.
	The area of development west of Robertstown is designated as Class 4 Special Landscape under the Kildare County Development Plan 2023-2029. In addition, a scenic viewpoint is located adjacent to the proposed development at Fentons bridge.	

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Checklist Questions	Yes/No/Briefly describe	Is this likely to result in a significant impact? Yes/No/Why?
	The proposed development will incorporate soft landscaping measures, grassed approach ramps, and a simple form of bridge all of which are in keeping with the surrounding landscape, especially along the canal bank.	
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?	The Grand Canal Greenway serves as a recreational route in the area, the proposed works will increase the safety and accessibility of this amenity to all members of the public.	No significant negative impacts
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.	The project will not result in significant impacts
18. Is the Project in a location in which it is likely to be highly visible to many people?	No. The proposed development includes landscaping and public realm design elements to ensure that the development will fit within the context of its surroundings.	No. The project will not result in significant impacts
19. Are there any areas or features of historic or cultural importance on or around the location that could be affected by the Project?	There are no recorded archaeological sites within the proposed site boundary or within a 200m radius of the site.	No. The project will not result in significant impacts
20. Is the Project located in a previously undeveloped area where there will be a loss of greenfield land?	The proposed development will be located in land previously used as the towpath for the Grand Canal. The majority of the land has an existing walking trail. In the context of the surrounding landscape the scale of the loss of greenfield land is minor. A 1m vegetated buffer zone shall be maintained to the edge of the canal.	No. The project will not result in significant impacts
22. Are there any plans for future land uses within or around the location that could be affected by the Project?	No. There are no plans for future land uses in the immediate area which might be negatively affected by the project.	No. The project will not result in significant impacts

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Checklist Questions	Yes/No/Briefly describe	Is this likely to result in a significant impact? Yes/No/Why?
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. The project will not result in significant impacts
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. The project will not result in significant impacts
25. Are there any areas within or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, that could be Affected by the Project?	No. There are no areas in proximity to the site which contain important, high quality or scarce resources that could be significantly negatively affected by the project.	No. The project will not result in significant impacts
26. Are there any areas within or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, that could be affected by the Project?	No. The Air quality in the area is considered good and the catchment water body in the area is considered good.	No. The project will not result in significant impacts
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. The project location is not susceptible to natural disasters. Ground conditions are stable and not susceptible to erosion. The proposed greenway shall be designed with a finished level 300mm above the canal flood level negating the risk of flooding.	No. The project will not result in significant impacts

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#### 2.4 Impact Characterisation

In summary, it is noted that the proposed works will likely have a positive impact on greenway users once completed and will result in a significant improvement to the safety and security of both greenway and road users by providing for full segregation between road and greenway users. As detailed in Table 2-1 there are no likely significant negative impacts associated with the proposed works.

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#### 3. CONCLUSIONS

The subject works which relate to the construction of two additional bridges on the Grand Canal Greenway do not individually or cumulatively fall into a class of development set out in Schedule 5, Part 1 and 2 of the Planning and Development Regulations 2001 - 2021 (as amended). The subject works do not fall into any of the categories of development for which EIA is considered mandatory under Roads Act 1993 (as amended) or the Road Regulations 1994 (as amended). Therefore, the requirements for a mandatory EIA can be screened out.

However, sub-threshold EIA may be required where the project would be likely to have significant effects on the environment. Criteria for the consideration of sub-threshold EIA is set out in Schedule 7 and Schedule 7A of the Planning and Development Regulations 2001 - 2021 (as amended). These criteria have been set out within this document with respect to the subject development.

As above-mentioned, the potential for the proposed project to have significant effects on nearby protected habitats has been considered, however it is concluded beyond reasonable scientific doubt that the integrity of sites within 15km will not be affected.

Potential impacts to the receiving environment during construction have been set out. Slight noise impacts are likely during the construction phase of the project due to the operation of construction machinery and the carrying out of other construction activities, however these are not considered to be significant given the distance to nearby receptors and the nature of the proposed works.

Slight visual impacts as a result of the subject development are noted, however, these impacts are not considered significant with regard to the proposed development type.

There will be no significant loss of habitat as the proposed design has been selected to minimize the loss of the most valuable portions of habitat. Due to the scale of the development and proposed retention of a portion of the habitat this loss is not considered to have a significant impact.

It is therefore submitted that sub-threshold EIA is not required for the subject works, due to the project's limited impact on the receiving environment with respect to Schedule 7 of the Planning and Development Regulations 2001-2018, Annex II of the EIA Directive and the screening checklist provided in the EC guidance document for EIA Screening, as set out in this document.

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