

## Eve O'Sullivan

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**Subject:** Dumping at Sea Licence ref: S0015-02 by Drogheda Port Company at Drogheda Port.  
**Attachments:** DAU-Dump at sea-S0015-02-Louth.pdf; ATT00001.txt; ATT00002.htm

**From:** Manager Dau [mailto:Manager.Dau@ahg.gov.ie]  
**Sent:** 05 September 2012 12:53  
**To:** Wexford Receptionist  
**Cc:** Tara Higgins  
**Subject:** Re: Dumping at Sea Licence ref: S0015-02 by Drogheda Port Company at Drogheda Port.

FAO: Eve O'Sullivan  
Tara Higgins

A Chara,

I refer to your notification with respect to the above proposed development application, please find hereunder nature conservation observations and recommendations of the Department of Arts, Heritage and the Gaeltacht, for consideration by your Authority.

Emmet Deegan,  
Development Applications Unit,  
Built Heritage and Architectural Policy,  
Newtown Road,  
Wexford

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*An Roinn*  
***Ealaíon, Oidhreachta agus Gaeltachta***  
*Department of*  
***Arts, Heritage and the Gaeltacht***

05/09/2012

**Our Ref:** E00109/2012  
**Your Ref:** S0015-02

Environmental Protection Agency,  
Office of Climate, Licensing & Resource Use,  
Headquarters, PO Box 3000  
Johnstown Castle Estate  
County Wexford.

**Re: Dumping at Sea Licence ref: S0015-02 by Drogheda Port Company at Drogheda Port.**

A Chara,

I refer to your notification with respect to the above proposed development application, please find hereunder nature conservation observations and recommendations of the Department of Arts, Heritage and the Gaeltacht, for consideration by your Authority.

The proposed development would occur within and adjacent to Boyne Coast and Estuary cSAC (Site Code: 001957). This site is designated for amongst others the marine Annex I habitats *Mudflats and sandflats not covered by seawater at low tide* and *Estuary*. It would also occur within and adjacent to Boyne Coast SPA (Site Code: 4080) designated for the conservation of wild birds under Council Directive 147/ 2009. The dumping-at-sea site would be outside of any currently designated habitats.

Plans or projects proposed to occur within or adjacent to Natura 2000 designated sites (Special Areas of Conservation and Special Protected Areas) are required under Article 6(3) of Council Directive 92/43/EC and Regulation 42 of the European Communities (Birds and Natural Habitats) Regulations (SI 473/2011) to assess the potential significance to the nature conservation interests of those designated sites.

Guidance on this process can be found within "Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC" published by the European Commission in 2001. A recent document entitled "Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities" published by the Department of the Environment, Heritage & Local Government is available to download on <http://www.npws.ie/planning/appropriateassessment/>.

As currently formulated the circulate Natura Impact Statement is not sufficiently detailed in order to inform the potential interaction with the designated area. The proponent should ensure that the following information is included in the Assessment to ensure the potential for interaction with marine habitats conservation interests are fully evaluated:

I. Full description of proposed operation/activity

- A full description of the proposed development methodology including specific detail as to how the main elements of the proposed development are to be executed e.g. type of dredging vessel *etc.*
- Are there similar operations/activities already or planned to occur in the locality? Would the proposed works act in conjunction with any existing or planned developments?
- A copy of the pollution contingency plan for operations included in the proposed plan.

II. Baseline description of relevant environment

The projected area of impact to Annex I habitats (Estuary and Mudflats/Sandflats), both directly and indirectly (as may occur from changes in the hydrodynamic environment), from the proposed development should be detailed to include whether this would interact with the noted Natura sites and Qualifying Interest habitats. This assessment should also evaluate whether the proposed development would interact with the structure and function of those features.

- The applicant should note that through an extensive national survey of benthic habitats this Department has undertaken ecological surveys in the area surrounding Drogheda Port. This data is currently being analysed but it is anticipated that it will be ready for public dissemination in autumn. It will be available to download from <http://www.npws.ie/protectedsites/> by searching the Site Code function or through contact with [offshore@ahg.gov.ie](mailto:offshore@ahg.gov.ie) once finalised. This data may form a useful baseline for evaluation of potential impact of the development.
- Generic conservation objectives for the site are also currently available through this portal. Once the above data has been fully finalised, site specific conservation objectives will be available.

Kindly forward any further information received or in the event of a decision being made a copy of same should be referred to the following address:

**The Manager,  
Development Applications Unit (DAU),  
Department of Arts, Heritage and the Gaeltacht,  
Newtown Road,  
Wexford**

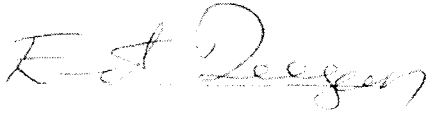
Alternatively, documentation associated with the above can be referred electronically to the DAU at the following address:

**[manager.dau@ahg.gov.ie](mailto:manager.dau@ahg.gov.ie)**

In addition, please acknowledge receipt of these observations by return.

*"please note the change to e-mail addresses, which take effect from 12:00pm on Monday, 15th August 2011"*

Is mise le meas,



**Emmet Deegan,**  
**Development Applications Unit**  
**Tel: (053) 911 7384**

## SITE SYNOPSIS

**SITE NAME: BOYNE COAST AND ESTUARY**

**SITE CODE: 001957**

Boyne Coast and Estuary is a coastal site which includes most of the tidal sections of the River Boyne, intertidal sand and mud flats, salt marshes, marginal grassland, and the stretch of coast from Bettystown to Termonfeckin that includes the Mornington and Baltray sand dune systems.

The Boyne River channel, which is navigable and dredged, is defined by training walls, these being breached in places. Intertidal flats occur on the sides of the channelled river. The sediments vary from fine muds in the sheltered areas to sandy muds or sands towards the river mouth. The linear stretches of intertidal flats to the north and south of the river mouth are mainly composed of sand. One or more species of Eelgrass (*Zostera* spp.) occur in the estuary.

Parts of the intertidal areas are fringed by salt marshes, most of which are of the Atlantic type, and dominated by Sea-purslane (*Halimione portulacoides*). Other species present include Common Saltmarsh-grass (*Puccinellia maritima*), Sea Plantain (*Plantago maritima*), Lax-flowered Sea-lavender (*Limonium humile*) and Glasswort (*Salicornia* spp.). Common Cord-grass (*Spartina anglica*) occurs frequently on the flats and salt marshes.

The two sand dune systems in the site, at Baltray and Mornington, are of conservation value, despite the restricted distribution of the intact areas and the high recreational pressure to which they are subjected. A gradient from embryonic dunes to Marram dunes and then fixed dunes is shown at both systems. The embryonic dunes are particularly well-developed at Baltray where there is active accretion. Species present include Sand Couch (*Elymus farctus*), Lyme-grass (*Leymus arenarius*), Marram, (*Ammophila arenaria*), Sea Sandwort (*Honkenya peploides*) and Prickly Saltwort (*Salsola kali*). The embryonic dunes grade into a narrow band of shifting Marram dunes. Marram is dominant, though there are also such species as Cat's-ear (*Hypochoeris radicata*), Mouse-ear Hawkweed (*Hieracium pilosella*) and Dandelion (*Taraxacum officinale*). The areas of fixed dunes on the site have a typical diversity of species, including Marram, Red Fescue (*Festuca rubra*), Wild Carrot (*Daucus carota*), Common Bird's-foot-trefoil (*Lotus corniculatus*), Common Restharrow (*Ononis repens*), Wild Thyme (*Thymus praecox*), Lady's Bedstraw (*Galium verum*) and Wild Pansy (*Viola tricolor*). Vegetation dominated by bryophytes and lichens is limited, though such species as *Brachythecium albicans*, *Hypnum cupressiforme*, *Peltigera canina* and *Cladonia* spp. occur. Some dune slacks may still occur at the site. A number of scarce plants such as Viper's-bugloss (*Echium vulgare*), Adder's-tongue (*Ophioglossum vulgatum*), Variegated Horsetail (*Equisetum variegatum*) and Wild Sage (*Salvia verbenaca*) have been recorded from the site in the past. The last-named

species is of particular note as it is a Red Data Book species at its most northerly known Irish station.

The Boyne is the second most important estuary for wintering birds on the Louth-Meath coastline. From a recent wetland survey carried out over 4 seasons (1994/95-97/98), it is known that this site supports nationally important numbers of Shelduck (176 individuals), Golden Plover (5,338), Lapwing (4,755), Knot (1,559), Black-tailed Godwit (414), Redshank (539), Turnstone (104), Oystercatcher (922), Grey Plover (112) and Sanderling (93).

Other species of regional or local importance include Brent Goose (142), Wigeon (485), Teal (185), Mallard (160), Dunlin (627), Curlew (352) and Ringed Plover (*c.* 100). An area of shingle at Baltray Dunes is also an important breeding site for Little Tern, with 14 pairs recorded in 1995. Little Tern is the rarest Irish tern species, and is listed on Annex I of the E.U. Birds Directive. Part of the estuary is a Wildfowl Sanctuary and has been designated a Special Protection Area under the E.U. Birds Directive.

In general the site has been somewhat modified by human activities. The river is regularly dredged to accommodate cargo ships, which can cause disturbance to the bird, fish and invertebrate communities in the estuary. Several factories operate upstream from the estuary and pollution and disturbance associated with them has had an impact on the ecology of the area. There is a proposal to create a deep water facility at the north end of Mornington Dunes on the mouth of the Boyne estuary.

The site is of considerable conservation as a coastal complex that supports good examples of eight habitats that are listed on Annex I of the E.U. Habitats Directive (estuaries, tidal mudflats, *Salicornia* mud, Atlantic salt meadows, Mediterranean salt meadows, embryonic shifting dunes, Marram dunes and fixed dunes) and for the important bird populations that it supports.

## SITE SYNOPSIS

**SITE NAME: BOYNE ESTUARY SPA**

**SITE CODE: 004080**

This moderately-sized coastal site is situated west of Drogheda on the border of Counties Louth and Meath. The site comprises most of the estuary of the Boyne River, a substantial river which drains a large catchment. Apart from one section which is over 1 km wide, its width is mostly less than 500 m. The river channel, which is navigable and dredged, is defined by training walls, these being breached in places. Intertidal flats occur along the sides of the channelled river. The sediments vary from fine muds in the sheltered areas to sandy muds or sands towards the river mouth. The linear stretches of intertidal flats to the north and south of the river mouth are mainly composed of sand. One or more species of Eelgrass (*Zostera* spp.) occur in the estuary. Parts of the intertidal areas are fringed by salt marshes, most of which are of the Atlantic type, and dominated by Sea-purslane (*Halimione portulacoides*). Other species present include Common Saltmarsh-grass (*Puccinellia maritima*), Sea Plantain (*Plantago maritima*), Lax-flowered Sea-lavender (*Limonium humile*) and Glasswort (*Salicornia* spp.). Common Cord-grass (*Spartina anglica*) occurs frequently on the flats and salt marshes.

The site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Shelduck, Oystercatcher, Golden Plover, Grey Plover, Lapwing, Knot, Sanderling, Black-tailed Godwit, Redshank, Turnstone and Little Tern. The E.U. Birds

Directive pays particular attention to wetlands and, as these form part of this SPA, the site and its associated waterbirds are of special conservation interest for Wetland & Waterbirds.

The Boyne Estuary is the second most important estuary for wintering birds on the Louth-Meath coastline. Black-tailed Godwit occurs here in internationally important numbers (471). A further nine species have populations of national importance, i.e. Shelduck (218), Oystercatcher (1,179), Golden Plover (6,070), Grey Plover (146), Lapwing (4,771), Knot (1,944), Sanderling (81), Redshank (583) and Turnstone (221) - all figures are mean peaks for the 5 year period 1995/96-1999/2000. Of particular note is that the site supports 6.8% of the all-Ireland population of Knot and almost 3% of the total for Golden Plover. Other species which occur include Bar-tailed Godwit (86), Cormorant (97), Brent Goose (172), Wigeon (454), Teal (230), Dunlin (498), Curlew (395), Mallard (197), Red-breasted Merganser (14), Greenshank (6), Ringed Plover (80) and Mute Swan (13). The site provides both feeding and high-tide roost areas for the birds. The estuary also attracts large numbers of gulls in winter, including Black-headed Gull (593), Common Gull (145), Herring Gull (403) and Great Black-backed Gull (160).

Little Tern have bred here since at least 1984. In the intervening years breeding numbers and fledgling success has varied significantly. In 1996 approximately 20 pairs fledged 15 - 20 chicks but in 1998 and 1999 part of the shingle bank where the birds nested was washed away by storms. In 2007 a successful Little Tern breeding colony was recorded.

The site is of considerable ornithological importance for wintering waterfowl, with Black-tailed Godwit occurring in internationally important numbers and nine other species having populations of national importance. Of particular significance is that two of the wintering species, Golden Plover and Bar-tailed Godwit are listed on Annex I of the E.U. Birds Directive. Little Tern is also listed on Annex I of this directive.

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