

1st November 2005

Our Ref.: E2005/88
Your Ref.: 222-1

Office of Licencing & Guidance,
Environmental Protection Agency,
Headquarters, PO Box 3000,
Johnstown Castle Estate,
County Wexford

Re: Facility at Blakescross, Lusk on behalf of Greenclean Waste Management

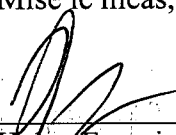
A Chara,


We refer to your query in reference to the above. Outlined below are the nature conservation comments of the Department of the Environment, Heritage and Local Government.

The main concern from a conservation point of view, is that the location for the new waste facility it is 100 m from Rogerstown Estuary candidate Special Area of Conservation (cSAC) site code number 000208 (site synopsis attached) and Special Protection Area (SPA) site code number 000015. The Ballough stream crosses the site and enters the estuary downstream. In addition it is proposed to install a biocycle system on site. The main threats to the designated site of Rogerstown Estuary is from any pollution either of the surface or groundwater at the site of the proposed development that could then get into the estuary.

Please ensure any licence given takes the water quality of the nearby SAC/SPA into account.

Mise le meas,


Helen Francis,
Development Applications Unit

Environmental
Protection Agency
07 NOV 2005


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SITE SYNOPSIS

SITE NAME: ROGERSTOWN ESTUARY

SITE CODE: 000208

Rogerstown estuary is situated about 2 km north of Donabate. It is a relatively small, narrow estuary separated from the sea by a sand and shingle bar. The estuary is divided by a causeway and narrow bridge, built in the 1840s to carry the Dublin-Belfast railway line. The site contains good examples of a number of habitats listed on Annex I of the EU Habitats Directive.

The estuary drains almost completely at low tide. The intertidal flats of the outer estuary are mainly of sands, with soft muds in the north-west sector and along the southern shore. Associated with these muds are stands of Cordgrass (*Spartina anglica*). Green algae (mainly *Enteromorpha* spp. and *Ulva lactuca*) are widespread and form dense mats in the more sheltered areas. The intertidal angiosperm, Beaked Tasselweed (*Ruppia maritima*), grows profusely in places beneath the algal mats. The Lugworm (*Arenicola marina*) is common in the outer estuary and large Mussel beds (*Mytilus edulis*) occur at the outlet to the sea.

The area of intertidal flats in the inner estuary is reduced as a result of the local authority refuse tip on the north shore. The sediments are mostly muds, which are very soft in places. Cordgrass (*Spartina anglica*) is widespread in parts, and in summer, dense green algal mats grow on the muds. In the extreme inner part, the estuary narrows to a tidal river.

Saltmarsh fringes parts of the estuary, especially the southern shores and parts of the outer sand spit. Common plant species of the saltmarsh include Sea Rush (*Juncus maritimus*), Sea Purslane (*Halimione portulacoides*) and Common Saltmarsh-grass (*Puccinellia maritima*). Salt meadows and wet brackish fields occur along the tidal river. Low sand hills occur on the outer spit, including some small areas of fixed dunes and *Ammophila* dunes. Fine sandy beaches and intertidal sandflats occur at the outer part of the estuary.

Two plant species, which are legally protected under the Flora (Protection) Order, 1999, occur within the site: Hairy Violet (*Viola hirta*) occurs on the sand spit and Meadow Barley (*Hordeum secalinum*) occurs in the saline fields of the inner estuary. This species has declined apparently due to reclamation and embankment of lands fringing estuaries. Another rare species, Green-veined Orchid (*Orchis morio*), occurs in the sandy areas of the outer estuary.

Rogerstown Estuary is an important waterfowl site, with Brent Geese having a population of international importance (1176). A further 16 species have populations of national importance: Greylag Goose (186), Shelduck (785), Teal (584), Pintail (30), Shoveler (69), Oystercatcher (1028), Ringed Plover (152), Golden Plover (1813), Grey Plover (245), Lapwing (4056), Knot (2076), Dunlin (2625), Sanderling (57),

Black-tailed Godwit (272), Curlew (1549), Redshank (732) and Greenshank (22) (All counts are average peaks over four winters 1994/95 - 1997/98). The presence of a significant population of Golden Plover is of note and this species is listed on Annex I of the EU Birds Directive. The estuary is a regular staging post for autumn migrants, especially Green Sandpiper, Ruff, Little Stint, Curlew Sandpiper and Spotted Redshank.

Little Tern has bred at the outer sand spit, but much of the nesting area has now been washed away as a result of erosion. The maximum number of pairs recorded was 17 in 1991. Ringed Plover breed in the same area.

The outer part of the estuary has been designated a statutory Nature Reserve and a Special Protection Area under the EU Birds Directive. The inner estuary has been damaged by the refuse tip which covers 40 hectares of mudflat.

This site is an good example of an estuarine system, with all typical habitats represented, including several listed on Annex I of the EU Habitats Directive. Rogerstown is an internationally important waterfowl site and has been a breeding site for Little Terns. The presence within the site of three rare plant species adds to its importance.

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