

LENNON QUARRIES LTD.

**SOIL/STONES RECOVERY FACILITY IN TALLAGH,
BELMULLET, CO. MAYO**

**Habitat Directive
Screening for Appropriate Assessment Report**

July 2013
Revision A

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TOBIN CONSULTING ENGINEERS



Screening Statement

PROJECT: Soil/Stones Recovery Facility in Tallagh,
Bellmullet, Co. Mayo- Screening Statement

CLIENT: **Lennon Quarries Ltd**
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Bellmullet
County Mayo

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DOCUMENT AMENDMENT RECORD

Client:	Lennon Quarries Ltd.
Project:	Application to the EPA for a Review of Waste Licence for Soils/Stones Recovery Facility in Tallagh, Belmullet, County Mayo (EPA Ref: W0256-02)
Title:	Screening for Appropriate Assessment Report

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PROJECT NUMBER: 6786				DOCUMENT REF: 6786 AA Screening			
Rev A	Screening Statement	JQ	26/06/13	RMcN	040713	DG	040713
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TOBIN Consulting Engineers							

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1 INTRODUCTION

Tobin Consulting Engineers on behalf of Lennon Quarries Ltd. were requested by the Environmental Protection Agency (EPA) to Screen for Appropriate Assessment, for proposed waste management activities at Tallagh, Belmullet, County Mayo, on land under the control of Lennon Quarries Ltd.

Lennon Quarries Ltd. operates an inert material recovery facility on lands at Tallagh, Bemullet, Co. Mayo. They wish to increase the total tonnage of material accepted per annum from 24,900 TPA to 90,000 TPA and are requesting that the current Waste Licence be reviewed and amended accordingly. To that end, an application for a Review of Waste Licence (W0256-01) was made to the EPA in August 2012 (Current Reference is W0256-02).

This Screening report was requested as further information to this application, in accordance with Article 12(2)(b)(ii) of the Waste Management (Licensing) Regulations. This Screening Statement considers whether any activity or proposed increase in activity on the lands, either individually or in combination with other plans or projects is likely to have a significant effect on Natura 2000 sites, in view of best scientific knowledge and the conservation objectives of the site(s).

This assessment comprised both a desktop study and a field survey. The desk study comprised the following elements:

- Identification of all sites designated for nature conservation within 5km of the site.
- Review of Ordnance Survey maps and aerial photography in order to determine broad habitats that occur within the existing site.
- Review of relevant reports and literature (C.A Farrell, Ecological Impact Assessment of proposed waste disposal site at Tallagh, Belmullet, Co. Mayo. June 2005, Tobin Consulting Engineers, Ecological Assessment at a material recovery facility in Tallagh, Belmullet, County Mayo. January 2009).
- Review of Existing Water Monitoring Data carried out in accordance with the Conditions of Waste Licence W0256-01.
- Review of Agronomy Report on Land Reclamation Activity at Tallagh carried out by Carton Rural Consultants, January 2011.
- Review of Environmental Protection Agency Envision Mapviewer¹ (regarding baseline water quality data).

To inform the screening process a site visit was conducted on 28th June 2013 by an experienced ecologist to evaluate ecological receptors in the vicinity of the site. Potential impacts from the proposed work activities which may affect designated sites (Natura 2000) were also considered. In particular downstream qualifying aquatic receptors and existing water quality were assessed.

This assessment and report was carried out by an experienced trained ecologist (>18 years experience) from TOBIN Consulting Engineers.

1.1 LEGISLATIVE CONTEXT

This screening report details an assessment of the potential adverse or negative effects of a plan or project, in combination with other plans or projects, on a European Site (Natura 2000). These sites consist of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) and provide for the protection and long-term survival of Europe's most valuable and threatened species and habitats. Although not specifically required, it would be considered best practice to include Ramsar sites (classified under the Ramsar Convention 1971) in the assessment process.

The requirement for a Habitat Directive Assessment is outlined in Article 6(3) and 6(4) of the Habitats Directive.

Article 6(3) of the Habitats Directive requires that:-

"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or

¹ <http://gis.epa.ie/Envision/>

projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."

And Article 6(4) of the Habitats Directive requires that:-

"If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted."

1.2 GUIDANCE

This report has been carried out using the following guidance:

- Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities, Department of the Environment, Heritage and Local Government (2009);
- Circular NPW 1/10 & PSSP 2/10;
- EPA Ireland guidelines²;
- Managing Natura 2000 Sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC, Office for Official Publications of the European Communities, Luxembourg (EC 2000);
- 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, Office for Official Publications of the European Communities, Luxembourg (EC 2001); and
- Guidance document on Article 6(4) of the 'Habitats' Directive' 92/43/EEC – Clarification of the concepts of: alternative solutions, imperative reasons of overriding public interest, compensatory measures, overall coherence, opinion of the commission. Office for Official Publications of the European Communities, Luxembourg (EC 2007).

1.3 APPROACH

There are four main stages in this exercise the requirements for each depending on likely impacts to Natura 2000 sites (SAC/ SPA). Depending on potential impacts the Habitat Directive Assessment can generally be finalised at screening or appropriate assessment stages.

Stage One: Screening - The process, which identifies the likely impacts on European Sites of a project or plan, either alone or in combination with other projects or plans, and considers whether these impacts are likely to be significant. This stage only is detailed in this report and if no significant impacts are likely then the process is finalized at this stage.

The process for screening is progressed as per the following steps (based EPA guidelines)

Step 1 – Management of the Site

Step 2 – Description of Plan or Project

Step 3 – Characteristics of Site

Step 4 – Assessment of Significance. The assessment of the likelihood of significant effects of a proposed or existing plan or project on a European Site.

Stage Two: Appropriate Assessment - the consideration of the impact of the project or plan on the integrity of the Natura 2000 site, either alone or in combination with other projects or plans, with respect to the site's structure and function and its conservation objectives. The competent Authority drafts the AA.

² <http://www.epa.ie/downloads/forms/lic/wwda>

Stage Three: Assessment of Alternative Solutions – the process which examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the Natura 2000 site.

Stage Four: Assessment Where Adverse Impacts Remain - an assessment of compensatory measures where, in the light of an assessment of Imperative Reasons of Overriding Public Interest (IROPI), it is deemed that the project or plan should proceed.

The appropriate assessment phase was progressed in the following steps as per EPA guidelines.

Step 1 – Information required

Step 2 and 3: Impact prediction and conservation objectives

Step 4 – Mitigation.

2 SCREENING PROCESS

Step 1: Management of the site

Question: Is the plan or project directly connected with or necessary to the management of the Natura 2000 site?

Answer: No

Step 2: Description of the project or plan

Lennon Quarries Ltd. has operated an inert material recovery facility on lands encompassing 27.22ha at Tallagh, Belmullet, Co. Mayo since January 2006 under a Waste Permit from Mayo County Council – Waste Permit No. Per 144 06/07/2005 and under a Waste Licence W0256-01 since May 2011, allowing recovery of inert soil and stones from within the local area, by deposition on the site, with a consequential benefit of improving land for agricultural use. Lennon Quarries Ltd. wish to increase the total tonnage of material accepted at the site from 24,900 tonnes per annum to 90,000 tonnes per annum (TPA). The level of the site, agreed with the EPA in the original waste licence, will not change. The increased tonnage will have the effect of completing works at the site ahead of schedule.

As part of the waste licence agreement granted in 2011, the drainage pattern within the site was upgraded to provide for adequate runoff and treatment of waters draining the site. Settlement lagoons were installed to ensure that any water draining the site is treated before entering local watercourses. The placement of inert material has always been restricted to a specific deposition area, leaving a buffer zone to the north of the site and this restriction will be retained. The deposition of material has been and will continue to be staggered over a number of years and at irregular intervals.

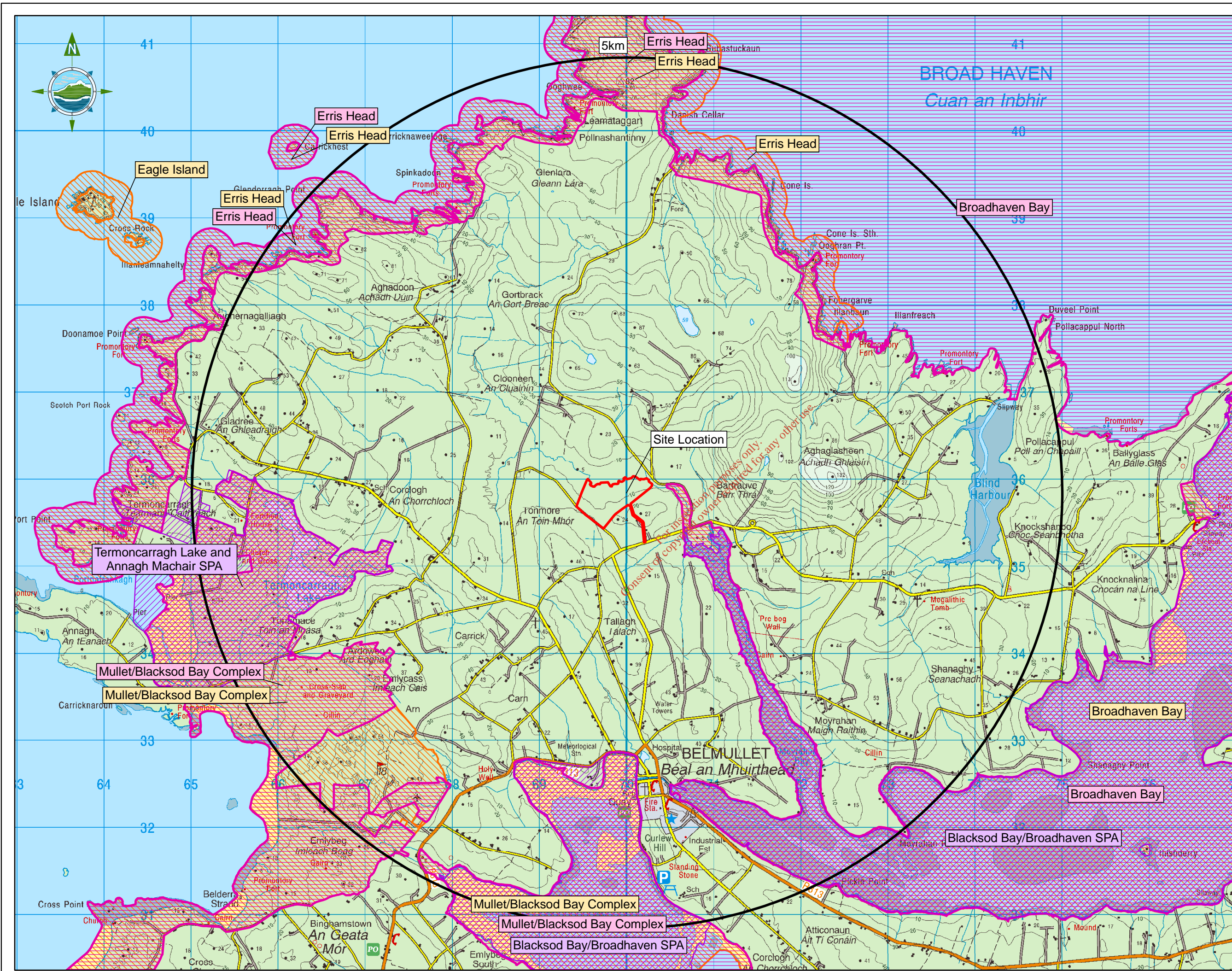
Given that the area of deposition (20.48ha) will remain the same and the buffer zone will continue to be enforced, there is no additional loss of ecological habitats within the site as a result of the proposed waste licence review.

Step 3: Characteristics of the site

The proposed development is not located in a Natura 2000 site. The river draining the site is the only possible linkage of site activities to Natura 2000 sites as Broadhaven Bay SAC is linked by this river which receives the treated water from the site. The only identifiable potential impact is indirect low risk water quality affects from onsite activities to downstream Natura 2000 sites.

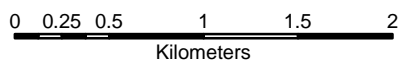
Table 1 below considers all Natura 2000 sites within 15km and key qualifying interests sensitivities to the development and screens these sites in/ out of Appropriate Assessment. This assessment considers both alone and in-combination affects. This assessment is primarily informed by the nature of the development, existing pollution controls and linkage to Natura 2000 sites. Figure 1.1 presents the designated areas within 15km of the site location.

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LEGEND

- Waste Licence Application Site Boundary
- 5km Buffer
- Proposed Natural Heritage Areas
- Special Areas of Conservation
- Special Protection Areas



- NOTES**
- FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING
 - ALL DRAWINGS TO BE CHECKED BY THE CONTRACTOR ON SITE
 - ENGINEER TO BE INFORMED OF ANY DISCREPANCIES BEFORE ANY WORK COMMENCES
 - ALL LEVELS RELATE TO ORDNANCE SURVEY DATUM AT MALIN HEAD

Issue	Date	Description	By	Chkd.
D02	09-01-09	Site boundary added	A.G.	A.A.
D01	05-01-09	Draft	A.G.	A.A.

Client:
LENNON QUARRIES LTD

Project:
ECOLOGICAL ASSESSMENT

Title:
DESIGNATED CONSERVATION AREAS

Scale @ A3: 1:40,000
 Prepared by: A.Gruschka Checked: A.Austin Date: Jan 2009
 Project Director: D. Grehan

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Drawing No.: **Figure 1.1** | **D01**

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Table 1: Natura 2000 sites within 15km of the development

Name	Site Code	Designation	Qualifying Interests	Distance from the site (km)	Screen in/ out/ uncertainty
Broadhaven Bay	000472	SAC	Mudflats and sandflats not covered by seawater at low tide [1140] Large shallow inlets and bays [1160] Reefs [1170] Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330] Submerged or partly submerged sea caves [8330]	0.2	Out – refer to site survey findings
Mullet / Blacksod Bay complex	000470	SAC	Mudflats and sandflats not covered by seawater at low tide [1140] Large shallow inlets and bays [1160] Reefs [1170] Salicornia and other annuals colonizing mud and sand [1310] Otter (<i>Lutra lutra</i>) [1355] Petalwort (<i>Petalophyllum ralfsii</i>) [1395] Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] Atlantic decalcified fixed dunes (<i>Calluno-Ulicetea</i>) [2150] Machairs [21A0] Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation [3150] Alkaline fens [7230]	2.1	Out Development scale, potential impacts and distance is suitably removed
Blacksod Bay / Broadhaven	004037	SPA	Great Northern Diver (<i>Gavia immer</i>) [A003] Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Common Scoter (<i>Melanitta nigra</i>) [A065] Red-breasted Merganser (<i>Mergus serrator</i>) [A069] Ringed Plover (<i>Charadrius hiaticula</i>) [A137] Sanderling (<i>Calidris alba</i>) [A144] Dunlin (<i>Calidris alpina</i>) [A149] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Curlew (<i>Numenius arquata</i>) [A160] Sandwich Tern (<i>Sterna sandvicensis</i>) [A191] Dunlin (<i>Calidris alpina</i>) [A149] wintering, (<i>Calidris alpina schinzii</i>) [A466] breeding, Wetlands & Waterbirds [A999]	0.5	Out – refer to site survey findings
Erris Head	001501	SAC	Vegetated sea cliffs of the Atlantic and Baltic coasts [1230] Alpine and Boreal heaths [4060]	3.2	Out Development scale, potential impacts and distance is suitably removed
Termoncarragh Lake and Annagh Machair	004093	SPA	Corncrake (<i>Crex crex</i>) [A122] Greenland White-fronted Goose (<i>Anser albifrons flavirostris</i>) [A395] Barnacle Goose (<i>Branta leucopsis</i>) [A396] Whooper Swan (<i>Cygnus cygnus</i>) [A038] Lapwing (<i>Vanellus vanellus</i>) [A142] Chough (<i>Pyrrhocorax pyrrhocorax</i>) [A346] Dunlin (<i>Calidris alpina schinzii</i>) [A466]	2.1	Out Development scale, potential impacts and distance is suitably removed

Name	Site Code	Designation	Qualifying Interests	Distance from the site (km)	Screen in/ out/ uncertainty
			Wetlands [A999]		
Mullet Peninsula	004227	SPA	Corncrake (Crex crex) [A122]	2.3	Out Development scale, potential impacts and distance is suitably removed
Inishglora & Inishkeeragh	004084	SPA	Storm Petrel (Hydrobates pelagicus) [A014] Cormorant (Phalacrocorax carbo) [A017] Shag (Phalacrocorax aristotelis) [A018] Lesser Black-backed Gull (Larus fuscus) [A183] Herring Gull (Larus argentatus) [A184] Arctic Tern (Sterna paradisaea) [A194] Barnacle Goose (Branta leucopsis) [A396]	9.4	Out Development scale, potential impacts and distance is suitably removed

SPA = Special Protection Area; SAC = Special Area of Conservation

As detailed in Table 1 above, the only Natura 2000 sites deemed relevant to this development are Broadhaven Bay SAC and (00472) and Blacksod Bay/ Broadhaven SPA (004037).

Broadhaven Bay SAC is located within 0.2km of the site, to the southeast and is directly linked to the site at Tallagh via the Clooneen River which receives discharge waters from the 5 no. on site lagoons at Tallagh. Qualifying interests at Broadhaven Bay SAC that have potential to be impacted by the site activities, in particular potential in-combination effects of a slight addition in sediment load (if untreated), include;

- Mudflats and sandflats not covered by seawater at low tide [1140];
- Large shallow inlets and bays [1160]; and
- Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330].

Broadhaven Bay complex drains into the Blacksod Bay/ Broadhaven SPA and Moyrahan Bay. Qualifying interests at Blacksod Bay/ Broadhaven SPA that have potential to be impacted by the site activities, in particular potential in-combination effects of a slight addition in sediment load (if untreated), include;

- Great Northern Diver (Gavia immer) [A003];
- Light-bellied Brent Goose (Branta bernicla hrota) [A046];
- Common Scoter (Melanitta nigra) [A065];
- Red-breasted Merganser (Mergus serrator) [A069];
- Ringed Plover (Charadrius hiaticula) [A137];
- Sanderling (Calidris alba) [A144];
- Dunlin (Calidris alpina) [A149];
- Bar-tailed Godwit (Limosa lapponica) [A157];
- Curlew (Numenius arquata) [A160];
- Sandwich Tern (Sterna sandvicensis) [A191];
- Dunlin (Calidris alpina) [A149] wintering, (Calidris alpina schinzii) [A466] breeding; and
- Wetlands & Waterbirds [A999].

Step 4: Assessment of significance

To inform if a significant impact is likely to arise a site visit was conducted to assess, in particular, baseline water quality upstream and downstream of the discharge from the site. The EPA mapviewer confirmed a Q3-4 Moderate water quality status (www.epa.ie 2012 data). However, the site study determined improved water quality (closer to Q4) downstream of the discharge point from the site. It was noteworthy that Stonefly nymphs were dominant followed by cased caddisfly and then small molluscs.

The site visit determined that the lagoons in operation at this location are performing adequately as there is no decrease in water quality upstream and downstream of the discharge point from the site to the Clooneen River.

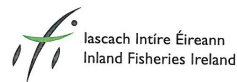
This indicates that the site is having no negative impact upon the Clooneen River and consequently the downstream SAC/ SPA detailed.

It should be noted that the site has been operational for the past ca. 2 years under a Waste Licence without any complaints or enforcement issues relating to water or water pollution as proven by Agency records. Furthermore, the compliance monitoring is all up to date and is compliant with the licence requirements. All in all, it is considered that Lennon Quarries Ltd. operate an extremely well run and well-monitored licensed soil recovery facility.

With regards to potential impacts relating to surface water and dust, the proposed proposals in the licence review to increase the annual tonnage from 24,900 to 90,000 tonnes provides an environmental gain as the phasing and restoration of the site will occur over a much shorter time period thereby speeding up the process by which the lands are seeded and stabilised and returned to productive agriculture. This minimises the potential for sedimentation of surface waters (notwithstanding the control measures already in place) and it provides even greater compliance with Condition 6.11.3: *Developed areas shall be seeded as soon as practicable after placement of cover soils, in a manner appropriate to the surrounding area and in any event in accordance with condition 10.2.2.*

Lennon Quarries Ltd. have consulted with and have received a letter of support from the Fisheries Board for the proposed Review with mitigation measures outlined in the Review of Waste Licence W0256-01 (see Figure 1.2).

Figure 1.2: Letter of Consultation from Inland Fisheries Ireland Concerning the Review of Waste Licence W0256-01



3 July 2012

Mr. T.J. Lennon
Lennon Quarries Ltd.,
Glencastle
Bunnahowen
Ballina
Co. Mayo

RE: Amendment request for Lennon Quarries Ltd. Soil/Stones Recovery Facility Waste Licence W0256-01 at Tallagh, Belmullet, Co. Mayo

Dear Mr. Lennon,

On the 28th June 2012 the above site was inspected by IFI staff and a meeting was held with you at your offices to discuss a proposed amendment to the above licence. It is proposed to increase the annual quantity of deposited material from 24,900tonne to 90,000tonne. IFI have no objections to the amendment provided there are no negative impacts on water quality in the Clooneen River or Moyrahan Bay and the following conditions are retained.

- The five on site settlement ponds must be monitored and maintained as per the waste licence.
- The Clooneen River buffer zone must be retained and each cell must be capped and seeded as it is filled.

Yours sincerely


John Conneely
Director

tjlennon-0612

Ceantar Abhantraí an Iarthair - Béar an Átha Teach Árd na Rí, Sráid na Mainistreach, Béal an Átha, Co. Mhaigh Eo.
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The existing precautionary design mitigation relevant to Natura 2000 sites detailed is implemented through management of the site to minimise risks to relevant surface water receptors. Management practices include:

- Existing settlement lagoons are maintained to ensure that any water draining the site is treated before entering the local watercourses;
- Regular sampling of treated waters will continue to be carried out to ensure sediment levels remain within prescribed limits and that settlement lagoons are acting effectively. This will be subject to requirements set by the EPA in Waste Licence Conditions; and
- The planned programme of material recovery will continue to be adhered to in order to reduce the impact of activities on the site, therefore reducing the disturbance to any mammal or bird life using the site.

The assessment of significance determines that localised impacts are negligible in the immediate vicinity of the development and hence beyond the immediate works area i.e. downstream SAC. No significant impact is expected to arise to the Broadhaven SAC and specifically the key qualifying habitats requiring consideration as a result of the proposed increase in inert natural material accepted at this location. The key monitoring and precautionary mitigation requirements of the Waste Licence are relevant to minimising risk to water quality and are recommended.

3 CONCLUSION

It is considered that no significant adverse effects are expected to arise to Natura 2000 sites from the proposed development and the project can be screened out of further stages of Appropriate Assessment.

Signed off by:



Mr. Roger McNaughton
Senior Ecologist

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