

# SCREENING REPORT TO INFORM APPROPRIATE ASSESSMENT PROCESS REDMILLS FEED MILL

**EPA Industrial Emissions Licence Application for Redmills Feed Mill Site,  
Goresbridge, Co. Kilkenny**

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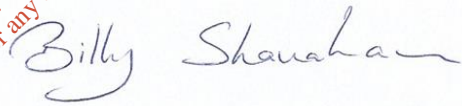
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## Table of Contents

<b>1. Introduction</b> .....	1
1.1. Aim of this Report .....	1
<b>2. Appropriate Assessment</b> .....	1
2.1. Requirement for an Assessment under Article 6 of the Habitats Directive. ....	1
2.2. Appropriate Assessment Guidance.....	2
2.3. Stages in the Process.....	2
<b>3. Assessment Criteria</b> .....	3
3.1. Description of the Site Activities.....	3
3.2. Natura 2000 Sites in and within 15km of the Feed Mill .....	4
3.2.1. River Barrow and River Nore SAC 002162 .....	4
3.2.2. Red Bog, Dungarvan pNHA 000846 .....	5
3.2.3. Whitehall Quarries pNHA 000855.....	6
3.2.4. Ballymoon pNHA 000797 .....	6
3.2.5. Clohastia pNHA 000830 .....	6
3.2.6. Blackstairs Mountain SAC 000770 .....	6
3.2.7. Blackstairs Mountain pNHA 000770 .....	6
3.2.8. River Nore SPA 004233 .....	6
3.2.9. Achersgrove pNHA 002051.....	7
3.3. Assessment Criteria .....	7
3.3.1. Individual elements likely to impact Natura 2000 sites.....	7
3.3.2. Direct, indirect or secondary impacts on any Natura 2000 site: .....	7
3.3.3. Likely changes to a Natura 2000 site; .....	9
3.3.4. Likely impacts on the Natura 2000 site as a whole:.....	9
3.3.5. Indicators of significance .....	9
3.3.6. Overall impacts on the Natura 2000 sites.....	9
<b>4. Find of No Significant Effects Matrix</b> .....	10
4.1. Assessment of Significance of Effects .....	10
<b>5. Conclusion</b> .....	11

## ATTACHMENTS

Attachment 1 – Drawing 3233-001 – Natura 2000 Site Location Map

## 1. Introduction

JRE Environmental (JRE) were commissioned by Redmills Feed Mill (Redmills), Goresbridge, Co. Kilkenny to prepare a Screening Report to inform the Appropriate Assessment (AA) or Natura Impact Statement (NIS) process to assess the potential impacts from the operation of the Redmills Animal Feed Mill site may have on any Natura 2000 sites in its vicinity.

### 1.1. Aim of this Report

This Screening Report aims to inform the AA/NIS process of the potential impacts as part of an EPA Industrial Emission Licence Application for the Redmills Feed Mill site (Redmills) located in Goresbridge, Co. Kilkenny in accordance with the requirements of Article 6(3) of the EU Habitats Directive (Directive 92/43/EEC) and the requirements of the Planning and Development Act 2000 – 2010 (the Act). This screening report will assess if the Redmills Feed Mill, operating individually, or in combination with other plans or projects, is likely to have a potentially significant impact on any Natura 2000 site.

## 2. Appropriate Assessment

### 2.1. Requirement for an Assessment under Article 6 of the Habitats Directive.

The requirement for an Appropriate Assessment is set out in the EU Habitats Directive (92/43/EEC). The aim of the European Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora) is to create a network of protected wildlife sites in Europe, maintained at a good conservation status. The network of sites is referred to as Natura 2000 sites. In Ireland, the Natura 2000 network of European sites comprises Special Areas of Conservation (SAC's, including candidate SACs), and Special Protection Areas (SPA's, including proposed SPA'S). SACs are selected for the conservation of vulnerable and threatened habitat types and species (other than birds). SPA's are selected for the conservation of vulnerable and threatened species of birds and other regularly occurring migratory birds, and their habitats.

The European Habitats Directive (EHD) (Council of the European Communities 1992) was transposed into Irish legislation by the European Communities (Natural Habitats) Regulations 1997. The Directive specifies the scientific criteria on the basis of which Natura 2000 sites must be selected and sets out various procedures and obligations in relation to the nature conservation management which must be undertaken for the purpose of ensuring the protection of the Natura 2000 sites.

Article 6(3) of the Habitats Directive states: *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 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.*

Furthermore, Article 6(4) states: *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 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. Where the site concerned hosts a priority natural habitat type and/or a priority species the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest.*

## 2.2. Appropriate Assessment Guidance

The preparation of this Assessment has been informed by reference to the following guidance documents:

- EU Guidance Document on Article 6(4) of the Habitats Directive 92/43/EEC (European Commission 2007)
- MANAGING NATURA 2000 SITES. The provisions of Article 6, of the Habitats Directive 92/43/EEC, (European Commission 2000).
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (DoEHLG 2009)
- Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC (European Commission 2002)

## 2.3. Stages in the Process

Article 6 of the Habitats Directive provides a strict assessment procedure for any plan or project not directly connected with or necessary to the management of the site but which has the potential to have implications for the site in view of the site's conservation objectives.

According to the European Commission's guidance document, it has become generally accepted that the assessment requirements of Article 6 establish a stage by stage approach. The stages proposed by the guidance document are:

**Stage One:** Screening. The process which identifies the likely impacts upon a Natura 2000 site 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.

**Stage Two:** Appropriate Assessment. The consideration of the impact on the integrity of the Natura 2000 site of the project or plan, either alone or in combination with other projects or plans, with respect to the site's structure and function and its conservation objectives. Additionally, where there are adverse impacts, an assessment of the potential mitigation of those impacts.

**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 no alternative solutions exist and 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.

### 3. Assessment Criteria

This section outlines the Assessment Criteria and Screening Matrix which was followed in assessing the impact of the proposed Industrial Emission Licence at the Redmills Feed Mill site, Goresbridge, Co. Kilkenny on surrounding Natura 2000 sites.

#### 3.1. Description of the Site Activities

This Screening Report is being conducted as part of an application for an Industrial Emission Licence at the Redmills Feed Mill site in Goresbridge, Co. Kilkenny. The facility is located approximately 1km to the north of the village of Goresbridge. The site has an area of approximately 67,600 m<sup>2</sup> as seen in Figure 1.

**Figure 1. Site Area**



The Industrial Emissions licence application is under “Class 7.8 (a) The treatment and processing, other than exclusively packaging, of the following raw materials, whether previously processed or unprocessed, intended for the production of food or feed from:

- (ii) only vegetable raw materials with a finished product production capacity greater than 300 tonnes per day or 600 tonnes per day where the installation operates for a period of no more than 90 consecutive days in any year” of the First Schedule of the Environmental Protection Agency Act 1992, as amended.

Under the Redmills brand, the feed mill produces nutrition for a wide range of animals using advanced feed manufacturing technology and nutritional research, together with fully traceable ingredients, Redmills offer high-quality, consistent and nutritious feeds to our customers.

The main operation and processes employed at the plant are outlined below.

- Weigh Bridge
- In taking of materials
- Bulk storage
- Grinding
- Mixing
- Pressing
- Cyclone cooling
- Finished goods assembly
- Finished goods storage
- Offices/Canteen

The Feed Mill facility at Redmills is operational 24 hours a day.

### 3.2. Natura 2000 Sites in and within 15km of the Feed Mill

The zone of examination in respect to Natura 2000 Sites has been taken as a 15Km radius from the site, results can be seen in Table 1 and on Drawing 3225A-001 in Attachment 1:

**Table 1; Natura 2000 sites within 15km of the proposed storage facility**

Distance	Site	No.
0.12 km	River Barrow and River Nore SAC	002162
7.18 km	Red Bog, Dungarvan pNHA	000846
8.53 km	Whitehall Quarry pNHA	000855
9.27 km	Ballymoon Esker pNHA	000797
9.65 km	Clohasia pNHA	000830
10.88 km	Blackstairs Mountains SAC	000770
10.88 km	Blackstairs Mountains pNHA	000770
12.86 km	River Nore SPA	004233
14.77 km	Acrhersgrove pNHA	002051

As can be seen from Table 1 there are a number of sites located within this 15km zone and there is one site located within 5 km of the site.

The following provides a brief description of all the Natura 2000 sites found within 15km of the Redmills Feed Mill site. Full site descriptions and conservation objectives of each of the sites can be found at <http://www.npws.ie>.

#### 3.2.1. River Barrow and River Nore SAC 002162

This site consists of the freshwater stretches of the Barrow and Nore River catchments as far upstream as the Slieve Bloom Mountains, and it also includes the tidal elements and estuary as far downstream as Creadun Head in Waterford. The site passes through eight counties – Offaly, Kildare, Laois, Carlow, Kilkenny, Tipperary, Wexford and Waterford. Major towns along the edge of the site include Mountmellick, Portarlinton, Monasterevin, Stradbally, Athy, Carlow, Leighlinbridge, Graiguenamanagh, New Ross, Inistioge, Thomastown, Callan, Bennettsbridge, Kilkenny and Durrow. The larger of the many tributaries include the Lerr, Fushoge, Mountain,

Aughavaud, Owenass, Boherbaun and Stradbally Rivers of the Barrow, and the Delour, Dinin, Erkina, Owveg, Munster, Arrigle and King's Rivers on the Nore.

Both rivers rise in the Old Red Sandstone of the Slieve Bloom Mountains before passing through a band of Carboniferous shales and sandstones. The Nore, for a large part of its course, traverses limestone plains and then Old Red Sandstone for a short stretch below Thomastown. Before joining the Barrow it runs over intrusive rocks poor in silica. The upper reaches of the Barrow also run through limestone. The middle reaches and many of the eastern tributaries, sourced in the Blackstairs Mountains, run through Leinster Granite. The southern end, like the Nore runs over intrusive rocks poor in silica. Waterford Harbour is a deep valley excavated by glacial floodwaters when the sea level was lower than today. The coast shelves quite rapidly along much of the shore.

The site is a Special Area of Conservation (SAC) selected for the following habitats and/or species listed on Annex I / II of the E.U. Habitats Directive (\* = priority; numbers in brackets are Natura 2000 codes):

- [1130] Estuaries
- [1140] Tidal Mudflats and Sandflats
- [1170] Reefs
- [1310] Salicornia Mud
- [1330] Atlantic Salt Meadows
- [1410] Mediterranean Salt Meadows
- [3260] Floating River Vegetation
- [4030] Dry Heath
- [6430] Hydrophilous Tall Herb Communities
- [7220] Petrifying Springs\*
- [91A0] Old Oak Woodlands
- [91E0] Alluvial Forests\*
- [1016] Desmoulin's Whorl Snail (*Vertigo moulinsiana*)
- [1029] Freshwater Pearl Mussel (*Margaritifera margaritifera*)
- [1092] White-clawed Crayfish (*Austropotamobius pallipes*)
- [1095] Sea Lamprey (*Petromyzon marinus*)
- [1096] Brook Lamprey (*Lampetra planeri*)
- [1099] River Lamprey (*Lampetra fluviatilis*)
- [1103] Twaité Shad (*Alosa fallax*)
- [1106] Atlantic Salmon (*Salmo salar*)
- [1355] Otter (*Lutra lutra*)
- [1421] Killarney Fern (*Trichomanes speciosum*)
- [1990] Nore Freshwater Pearl Mussel (*Margaritifera durrovensis*)

### 3.2.2. Red Bog, Dungarvan pNHA 000846

Red Bog, Dungarvan pNHA is a proposed natural heritage area that is located 7.18 km to the southwest of the Redmills facility.



### 3.2.3. Whitehall Quarries pNHA 000855

Whitehall Quarries is a proposed natural heritage area in County Kilkenny that is located 8.53 km to the northwest of the Redmills facility.

### 3.2.4. Ballymoon pNHA 000797

Ballymoon Esker is a quarry that is a proposed NHA for its biological interest, despite the working pits, and the existing site boundary is applicable to the geomorphological interest. The site is located 9.27 km to the northeast of the Redmills facility.

### 3.2.5. Clohastia pNHA 000830

Clohastia is a proposed natural heritage area that is located 9.65 km to the southeast of the Redmills facility.

### 3.2.6. Blackstairs Mountain SAC 000770

The Blackstairs Mountains are located along the border of the Counties Wexford and Carlow, forming a mountain chain that runs in a north-east/south-west direction for approximately 22 km, and includes six peaks over 520 m. The range has a core of granite, and on the Carlow side, erosion has cut deeply into the dome exposing successive layers of granite, giving a steeply stepped slope. On the east side some overlying Ordovician slates and sandstones are evident. The site is a Special Area of Conservation (SAC) selected for the following habitats and/or species listed on Annex I / II of the E.U. Habitats Directive (\* = priority; numbers in brackets are Natura 2000 codes):

- [4010] Wet Heath
- [4030] Dry Heath

### 3.2.7. Blackstairs Mountain pNHA 000770

This site is a proposed Natural Heritage Area located 10.88 km to the east of the Redmills Feed Mill site.

### 3.2.8. River Nore SPA 004233

The River Nore SPA is a long, linear site that includes the following river sections: the River Nore from the bridge at Townparks, (north-west of Borris in Ossory) to Coolnamuck (approximately 3 km south of Inistioge) in Co. Kilkenny; the Delour River from its junction with the River Nore to Derrynaseera bridge (west of Castletown) in Co. Laois; the Erkina River from its junction with the River Nore at Durrow Mills to Boston Bridge in Co. Laois; a 1.5 km stretch of the River Goul upstream of its junction with the Erkina River; the Kings River from its junction with the River Nore to a bridge at Mill Island, Co. Kilkenny. The site includes the river channel and marginal vegetation.

The site is a Special Protection Area (SPA) under the E.U. Birds Directive of special conservation interest for the following species: Kingfisher.

A survey in 2010 recorded 22 pairs of Kingfisher (based on 16 probables and 6 possible territories) within the SPA. Other species which occur within the site include Mute Swan (35), Mallard (267), Cormorant (14), Grey Heron (45), Moorhen (14), Snipe (17) and Sand Martin (1,029) – all figures are peak counts recorded during the 2010 survey.

The River Nore SPA is of high ornithological importance as it supports a nationally important population of Kingfisher, a species that is listed on Annex I of the E.U. Birds Directive

### 3.2.9. Archersgrove pNHA 002051

Archersgrove is a proposed natural heritage area located 14.77 km to the west of the Redmills facility.

### 3.3. Assessment Criteria

Appropriate Assessments identify and outline the impacts that might, either alone or in combination with another plan or project, significantly adversely impact the integrity of any Natura 2000 site.

#### 3.3.1. Individual elements likely to impact Natura 2000 sites

Considering the limited and contained nature of the Redmills Feed Mill site it is envisaged that there will be no individual elements that are likely to impact on any Natura 2000 sites in the direct vicinity or within 15km radius.

#### 3.3.2. Direct, indirect or secondary impacts on any Natura 2000 site:

##### **a) size and scale, area and land-take**

The size, scale, area and land take of the proposed development will be nil as the proposal is for an existing site located on site at Goresbridge, County Kilkenny.

##### **b) Distance from the Natura 2000 site or key feature of the site**

There are three Natura 2000 sites located within 15km of the Feed Mill site at Redmills ranging from 2.37km South East (Slaney River Valley SAC) and 10.88 km northeast of the Site (Blackstairs Mountain SAC). Considering the limited and contained nature of the proposed developments at Redmills Feed Mill it is envisaged that there will be no adverse impact on any Natura 2000 sites in the immediate vicinity of, or within a 15km radius.

##### **c) Resource requirements (water abstraction etc.)**

There are no water abstraction requirements for the facility that would impact any Natura 2000.

##### **d) Emissions and Waste (disposal to land, water or air)**

There are six main discharges from the facility; noise emissions, particulate emissions, boiler stack emissions, surface water, sewer and fugitive emissions, each are detailed in the following:

#### Noise Emissions

Noise emissions emanating from the Redmills Feed Mill site are not envisioned to have an impact on the Natura sites in the vicinity of the facility. Noise emission monitoring was carried out in December 2015 as part of the EPA Industrial Emissions Licence. Monitoring was completed at six locations (three boundary locations and three noise sensitive locations) and no tonal or impulse noise component was recorded during the monitoring event. The results indicated no impact to noise sensitive receptors in the immediate vicinity of the Mill site and therefore it is not considered that there would be any impact on any Natura 2000 site with the closest located over 2 km from the site.

#### Particulate Emissions

Particulate emissions from the stacks at the Redmills Feed Mill site were sampled in January 2017, and all results were less than or only marginally greater than the ELV of 50 mg/m<sup>3</sup>. The low particulate emission levels indicated that emissions from the Redmills Feed Mill site would have no significant impact on any Natura 2000 site.

### Boiler Stack Emissions

Flue gas emissions from the boiler stack at the Redmills Feed Mill site were monitored for nitrous oxides, carbon monoxide, carbon dioxide and sulphur dioxide in January 2017. The monitoring results were not significant. The emission levels coupled with the distance to the closest Natura 2000 site would indicate that flue gas emissions from the Redmills Feed Mill site would have no significant impact on any Natura 2000 site.

### Storm Water Emissions

Surface water runoff from the site roofs and yard and the site car park are directed to the main storm water drain exiting the site at the main gate to the site. All surface water from the site discharges to one of three oil/water interceptors located on site before then entering a surface drainage culvert. The site also has an integrated constructed wetland (ICW) located to the east of the site (on the east side of the L7000 Road). The ICW receives surface water runoff from the site yard surface at the main grain stores. A review of the discharge from the ICW from June 2016 indicated that concentrations of contaminants of concern (e.g., ammonia, nitrate, oils fats and greases, BOD and chloride) were all less than the applicable surface water quality limits and were less than the concentrations measured in the Barrow River upstream of the wetlands. The surface water sample collected from the River Barrow downstream from the Redmills site indicated only a marginal increase in BOD and COD but a reduction in nitrate oils fats and greases. All other parameters in the sample collected downstream of the Redmills facility were similar in concentration to the upstream concentrations indicating no significant impact from the ICW or the site surface water discharge from the Redmills site on the River Barrow SAC. The water quality for the River Barrow between 2004 and 2015 was reviewed using the EPA map viewer resource. The biological quality in the River barrow in Goresbridge (downstream of the site) was classed as Q3-4, moderate status which is consistent with the closest upstream monitoring location at Fenniscourt lock (i.e., Q3-4, moderate status).

### Sewer

The foul waste coming from the Feed Mill at Redmills is limited and is directed to the on-site septic tank, polishing bed and percolation system. Following settlement and treatment the foul water is then discharged to the septic field. It is not envisioned that sewer waste water will have a significant impact on the River Barrow, but the potential for some bacterial impact exists. However, analysis on downstream river sample for metals (i.e., copper, iron and manganese) are less than or equal to the results from upstream of the site. The Water Framework Directive (WFD) status of the River Barrow improves from poor to moderate immediately downstream of the Redmills site indicating no significant impact from the site on the adjacent Natura 2000 site.

### Ambient Dust Emissions

There are a number of bulk material intake pits on site; each of the intake pits has a canopy to prevent dust dispersing into the atmosphere. There are also bulk storage bins and stores for raw material, the emissions from these are considered to be 'fugitive' and will not give rise to negative air quality impacts off-site.

#### ***e) Transportation Requirements***

There will be no additional transportation requirements for the Redmills Feed Mill beyond that already in existence. There is no known impact to any Natura 2000 site related to the current Feed Mill activities and this would be expected to continue once the site is Licensed.

**f) Duration of Construction, operation, decommissioning**

There will be no construction as part of the Industrial Emission Licence Application. The site will have a decommissioning management plan introduced as part of their EPA licence to ensure that any decommissioning includes for appropriate environmental controls.

## 3.3.3. Likely changes to a Natura 2000 site;

The following, a) to f), describe potential impacts that a proposed development within or in close proximity to a Natura 2000 site could have;

- a. Reduction of habitat area
- b. Disturbance to key species
- c. Habitat or species fragmentation
- d. Reduction in Species Density
- e. Changes in key indicators of conservation value (water quality etc.)
- f. Climate Change

Based on the site operations and the site location relative to identified Natura 2000 sites it is considered that the Redmills Feed Mill will not give rise to any significant changes or pose any adverse impacts on the integrity of any Natura 2000 site. The facility accommodate the rearing of brown trout for release into the Barrow River which would be considered a positive impact to the SAC ensuring that native species are maintained in the waterbody.

## 3.3.4. Likely impacts on the Natura 2000 site as a whole:

In terms of;

**a) Interference with the key relationships that define the structure of the site**

The Redmills Feed Mill will not impact on the relationships that define the structure of identified Natura 2000 sites.

**b) Interference with key relationships that define the function of the site**

Due to the limited nature of the site and controls in place for dust and surface water runoff, the Redmills Feed Mill is not considered to pose any significant impact on the relationships that define the function of identified Natura 2000 sites.

## 3.3.5. Indicators of significance

As a result of the identification of effects set out above in terms of;

- a) Loss
- b) Fragmentation
- c) Disruption
- d) Disturbance
- e) Change to key elements of the site (e.g. water quality etc.).

## 3.3.6. Overall impacts on the Natura 2000 sites.

The continued operation of the Redmills Feed Mill site will not give rise to any significant adverse impacts on the integrity of any identified Natura 2000 site.

#### 4. Find of No Significant Effects Matrix

<b>Proposed Development</b>	Application for Industrial Emissions Licence
<b>Name &amp; Location of Natura 2000 sites</b>	River Barrow and River Nore SAC Blackstairs Mountains SAC River Nore SPA
<b>Description of the project</b>	This Appropriate Assessment is as part of an application for an Industrial Emissions Licence for an Existing Animal Feed Mill Facility in Goresbridge, Co. Kilkenny.
<b>Is the project directly connected with or necessary to the management of the site</b>	Yes
<b>Are there other projects or plans that together with the project plan being assessed could affect the site</b>	No

##### 4.1. Assessment of Significance of Effects

<b>Describe how the project or plan (alone or in combination) is likely to affect the Natura 2000 sites</b>	It is considered that the proposed development will have no significant adverse impact on any identified sites in the Natura 2000 network.
<b>Explain why these effects are not considered significant</b>	The proposed development is to be contained within an existing operational site. The closest Natura 2000 site is located approximately 100 m southeast of site. There will be no construction work associated with the site. The site emission controls coupled with low site emissions identified during site monitoring events indicate that the site will not have any significant effects.
<b>Information Sources</b>	National Parks & Wildlife Services Biodiversity Ireland National Biodiversity Data Centre

## 5. Conclusion

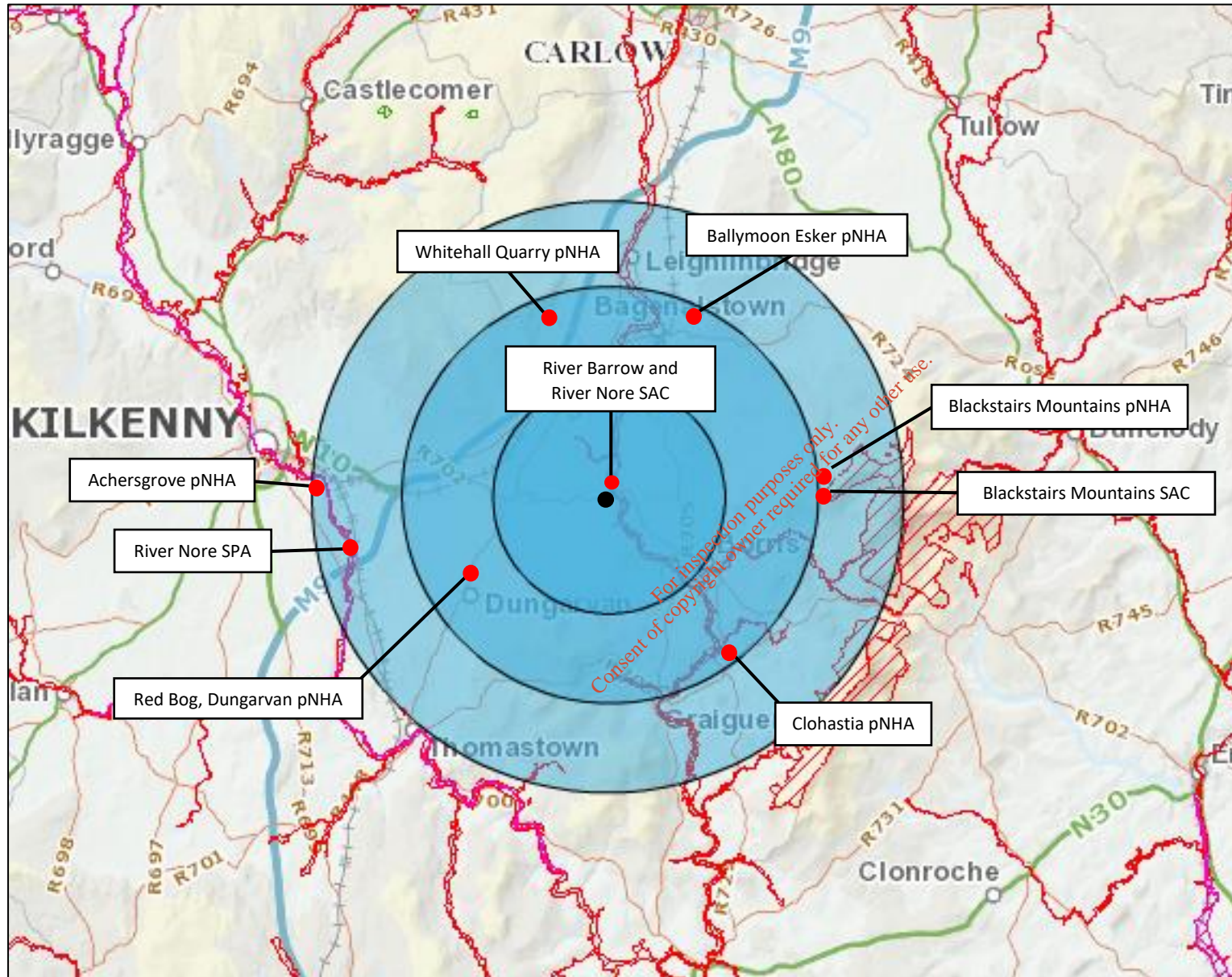
The Redmills Feed Mill site is already in existence and operational. There are no significant site emissions to surface water and emissions to atmosphere (i.e., particulates and noise) are all at or around the applicable emission limit values. It is considered that the continued operation of the Redmills Feed Mill site under an Industrial Emissions Licence will not give rise to any significant adverse impacts on the integrity of any Natura 2000 site, alone or in combination with any other plan or project in the area.


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# ATTACHMENT 1

## Drawing 3233-001 – Natura 2000 Site Location Map

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<b>Client:</b> Redmills	<b>Job No.:</b> 3233
<b>Drawing No.:</b> 3233-001	<b>Date:</b> 22/02/2017
<b>Legend:</b> Map sourced from NPWS online map viewer	