Eve O'Sullivan

Subject: FW: Re. Licence Amendment Request: CR04851 W0129-02 EPA043791
Attachments: TechnicalAmendmentReport.pdf; 2018.09.14 Murphy's quarry Screening final.pdf

From: Cian O'Hora [mailto:cian.ohora@imsirl.ie]
Sent: 14 September 2018 16:32
To: Karen Creed <K.Creed@epa.ie>
Subject: FW: Re. Licence Amendment Request: CR04851 W0129-02 EPA043791

Dear Dr Creed,

Please see attached an update AA Screening report for our site. The report submitted with the original documents was a number of years old.

Should you require any additional information please let me know.

Best regards,
Cian

From: noreply Reply <noreply@epa.ie>
Sent: Wednesday 18 July 2018 16:46
To: Cian O'Hora <cian.ohora@imsirl.ie>
Subject: Re. Licence Amendment Request: CR04851 W0129-02 EPA043791

Dear Cian O'Hora ,

The Agency wishes to acknowledge receipt of your Licence Amendment request Ref. No. CR04851 in relation to the above licence.

This request will be examined and you will be contacted in due course.

Yours sincerely

Environmental Licensing Programme,
Office of Environmental Sustainability,
Tel: 053-9160600

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Licence Alteration Request

Alteration Details		
Licence	**W0129-02**	**Integrated Materials Solutions Limited Partnership**
Licensee	Integrated Materials Solutions Limited Partnership	
Title of Alteration	**Technical Amendment Condition 3.5.5**	

Screening Report

No.	Question	Answer
1	Does the proposed alteration require a new class of activity or process?	No
2	Does the proposed alteration cause a new / additional main emission point?	No
3	Does the proposed alteration increase or change specified emissions **significantly**?	No
4	Does the proposed alteration increase **significantly** the overall total emission from the installation/facility?	No
5	Does the proposed alteration involve development or proposed development that has already been granted planning permission or requires a grant of planning permission and was/is subject to EIA by the Planning Authority or An Bord Pleanála?	No
6	Did the proposed alteration require the preparation of a Natura Impact Statement (NIS) for consideration by any Planning or Public Authority?	No
7	Does the proposed alteration indicate that the EPA should conduct an Appropriate Assessment (on foot of a screening for Appropriate Assessment)?	No
8	Does the proposed change conflict with BAT as set out in the relevant BAT Conclusions? See here	No
9	Does the proposed alteration adversely affect the energy efficiency of the installation/facility?	No
10	Does the proposed alteration adversely affect the environmental risk of the installation/facility **significantly**?	No

11	Does the proposed alteration cause an increase above the capacity limitations specified in the licence?	No
12	Does the proposed alteration require an extension of operating hours (where controlled by the licence) for an installation/facility where the public is likely to have an interest in such an extension?	No
13	Does the proposed alteration involve the incineration or co-incineration of waste materials displaying hazardous properties that were not previously authorised (as per the WID/IED)?	No
14	Does the proposed alteration introduce materials of techniques which adversely alter the probability, magnitude and duration or complexity of the site transboundary impact?	No
15	Does the proposed alteration constitute a substantial change?	No
16	Does the proposed alteration require a change to a condition or schedule of the Licence?	Yes

Recommendation

Based on your responses to the forgoing questions the recommended option is for you to submit a 'Request Licence Amendment' for this proposed alteration.

To submit this request to the EPA you should locate it in the 'Request Alteration' area in LMA. Click on 'Proceed' against this saved request, and then click on the 'Request Licence Amendment' button (in STEP 2 of the process). Then you will be required to provide more detailed information about your proposed amendment.

Note: The responses you have provided in this Screening Report will form part of the information record if you decide to proceed with this alteration request.

Recommendation Date: 09/03/2018

Licence Alteration Request

Clerical or Technical Amendment Application Details

Proposed Alteration Description

The alteration involved the amendment of a condition relating to the backfilling of the former quarry sump area in the south of the site. The current licence was issued at a time when the site was operating as both a landfill and quarry. It was envisaged that the quarry sump would be backfilled to the prescribed formation level (104.5mOD) with waste from quarry activities. Quarrying activities ceased in 2008 and it is not planned that they will resume. The proposed alteration is to allow other suitable backfill material to be imported to site and used to backfill the sump. This will allow development of the next landfill cell so that waste can be accepted. It will also remove a large body of standing water which presents a health and safety risk at the site. Further information is contained within the attached technical submission prepared by Golder Associates on behalf of IMS.

Priority	3. Urgent
Category of Amendment	(c) Otherwise facilitating the operation of the licence (or certificate) and the making of the amendment does not result in the relevant requirements of section 83(5) of the EPA Act as amended/ section 42B(1) of the Waste Management Act as amended/environmental requirements ceasing to be satisfied

Licence Condition Changes

Condition / Schedule Reference	Current Condition / Schedule Wording	Suggested New Wording
3.5.5	The formation level of the basal liner prior to emplacement of compacted clay shall be constructed at least one metre above the water table and in any event the formation level of the liner shall be no lower than 104.5 mAOD Malin. Any excavations deeper than the formation level shall only be backfilled with granular materials quarried from the facility.	The formation level of the basal liner prior to emplacement of compacted clay shall be constructed at least one metre above the water table and in any event the formation level of the liner shall be no lower than 104.5 mAOD Malin. Any excavations deeper than the formation level shall be backfilled with granular materials quarried from the facility or as approved by the Agency.

Questions

Q1	Is planning permission required to support the proposed alteration?	No
Q2	Does the application involve an installation boundary change?	No
Q3	Does the application involve changes to emissions to sewer?	No
Q4	Attach Appropriate Assessment Screening Report here	Appropriate Assessment.pdf

Additional Documentation

ScreeningReport.pdf

TA CA Application Report.pdf

Technical Amendment 3.5.5 L02.V1 .pdf

Licence Alteration Request

Final Declaration	
Name	Cian O'Hora
Position	Director

Application Details			
Selected by:	Cian O'Hora	**Selected date:**	09/03/2018
Submitted by:	Cian O'Hora	**Submitted date:**	18/07/2018

Proposed Infill of Quarry Pond and Discharge of Pond Waters

Murphy's Quarry, Naul, Co. Dublin

Screening Statement for Appropriate Assessment

Doherty Environmental

11th September 2018

Murphy's Quarry, Naul, Co. Dublin

Screening Statement in support of Appropriate Assessment

Document Stage	Document Version	Prepared by
Draft	1	Pat Doherty MSc, MCIEEM

Table of Contents

1.0 INTRODUCTION

Doherty Environmental Consultants (DEC) Ltd. has been commissioned by Integrated Materials Solutions Limited Partnership. to undertake a Screening Statement in support of an Appropriate Assessment (AA), under Article 6 of the EU Habitats Directive, for a proposal to discharge ponded surface water from an existing settlement pond at IMS Landfill (W0129-02), Fingal, Co. Dublin. Figure 1.1 shows the location of project site. This Screening for Appropriate Assessment forms Stage 1 of the Habitats Directive Assessment process and is being undertaken in order to comply with the requirements of the Habitats Directive Article 6(3). This Screening Statement has been prepared for the competent authority to facilitate them in determining whether the proposed project will have the potential (alone or in-combination with other projects) to result in likely significant effects to European Sites.

2.0 SCREENING METHODOLOGY

The function of the Screening Assessment is to identify whether or not the proposal will have a likely significant effect on European Sites. In this context "likely" refers to the presence of doubt with regard to the absence of significant effects (ECJ case C-127/02) and "significant" means not trivial or inconsequential but an effect that has the potential to undermine the site's conservation objectives (English Nature, 1999; ECJ case C-127/02). In other words any effect that compromises the functioning and viability of a site and interferes with achieving the conservation objectives for the site would constitute a significant effect.

The nature of the likely interactions between the proposed bridge works and the integrity of a European Site will depend upon whether or not European Sites occur within the zone of influence of the project site. The potential for likely significant effects to European Sites that do occur within the zone of influence of the project site will depend upon the project's potential to result in ecological effects and the sensitivity of European Site qualifying features to such effects.

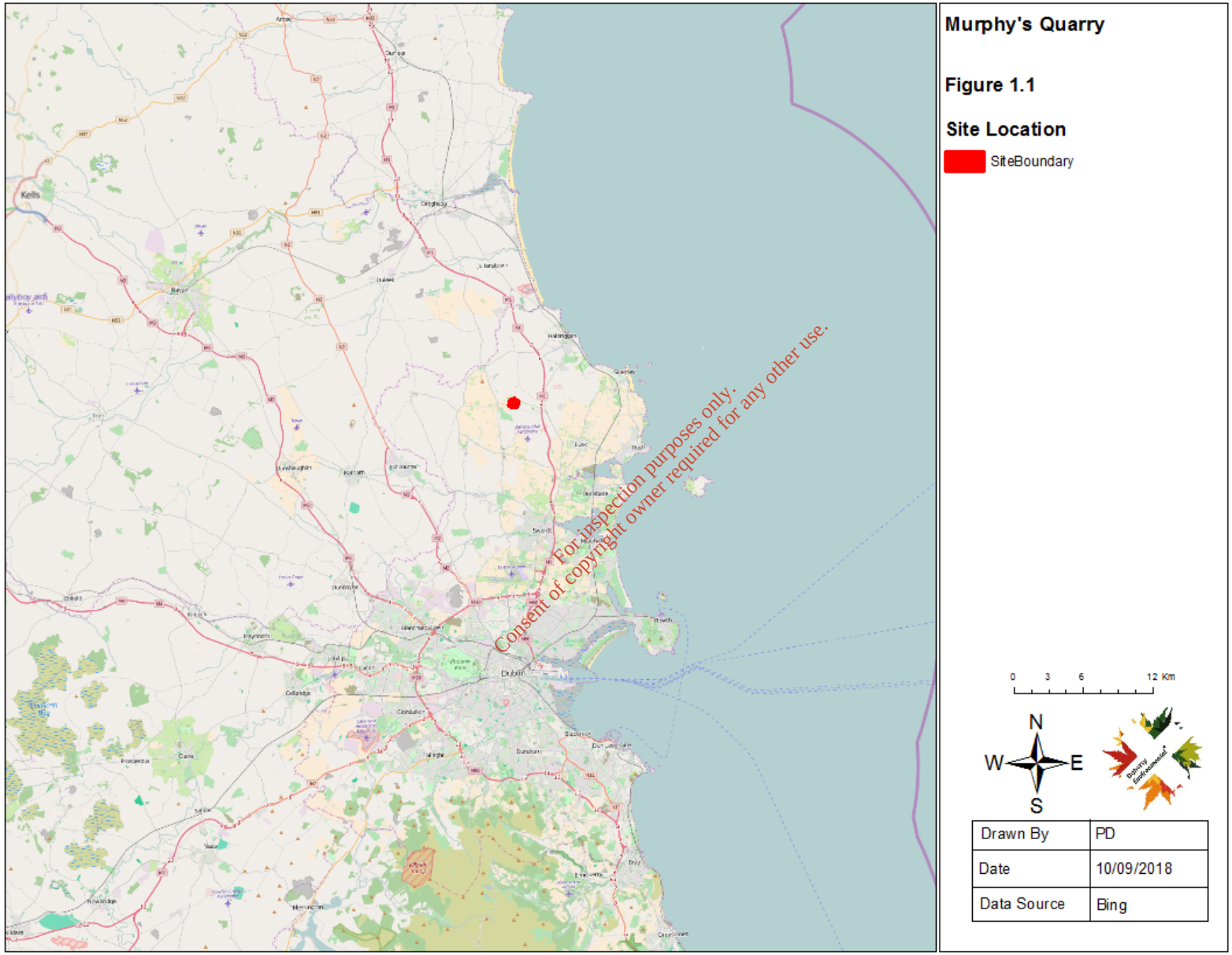
This Screening for Appropriate Assessment has been undertaken with reference to respective National and European guidance documents: Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (DEHLG 2010) and *Assessment of Plans and Projects Significantly Affecting Natura 2000 sites – Methodological Guidance of the*

Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC and recent European and National case law informing the approach to the Habitats Directive Assessment process. The following guidance documents were also of relevance during this Screening Assessment:

- A guide for competent authorities. Environment and Heritage Service, Sept 2002. Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2010). DEHLG.
- Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites – Methodological Guidance of the Provisions of Article 6(3) and (4) of the Habitats Directive 92/42/EED. European Commission (2001).
- Managing Natura 2000 Sites – The provisions of Article 6 of the Habitats Directive 92/43/EEC. European commission (2000). (To be referred to as MN 2000).

The European Commission (2001) Guidelines outline the stages involved in undertaking a Screening Assessment of a project that has the potential to have likely significant effects on European Sites. The methodology adopted for this Screening Assessment is informed by these guidelines and was undertaken in the following stages:

1. Define the project and determine whether it is necessary for the conservation management of European Sites;
2. Identify European Sites occurring within the zone of influence of the project;
3. Screen the European Sites occurring within the zone of influence of the project against established assessment criteria to determine if they are at risk of experiencing likely significant effects as a result of the project; and
4. Identify other plans or projects that, in combination with the project, have the potential to affect European Sites.



3.0 PROJECT DESCRIPTION

The project will comprise the discharge of settled surface water from the existing settlement pond at Murphy's Quarry to the watercourse that flows west to east along the northern boundary of the project site. This stream is referred to by the EPA as the Rath Great Stream. The discharge is required in order to allow the area to be backfilled so that the landfill cell can be developed as per the sites waste license W0129-02.

The total surface area of the pond to be discharged is approximately 27,000m^2. The average of the pond is approximately 2m, giving a total volume of water of 54,000m^3.

The discharge of settled water to the receiving watercourse along the northern boundary of the project will be restricted to greenfield runoff rates.

The settled waters will be pumped from the pond to the Rath Great Stream. A pump will be located towards the North of the pond. The pump intake will be at the pond surface.

4.0 DESCRIPTION OF THE SITE LOCATION

The ponds are located within Murphy's Quarry. They currently hold settled, clean water. Water quality analysis of the pond water has confirmed that the pond was is in good condition with all parameters analysis being within satisfactory limits, indicating clean and settled water.

The pond was created during the quarrying activates which occurred from the 1960s until they ceased in 2008. The site has been operating as a landfill for inert construction wastes since 2003.

Monitoring of the water quality within the pond has been undertaken by Patel Tonra Ltd (PTL). since March 2017. There have been 21 sampling events at the pond since the first sampling round in March 2017. The constituents of the water in the pond are outlined in Table 4.1.

Parameter	Average	Standard	Maximum	Groundwater

		Deviation		Regs Criterion
pH	8.1	0.5	8.9	>6 <9
Conductivity (mS/cm)	0.71	0.16	0.97	1.88
Temperature (°C)	13.4	6.0	23.9	N/A
Chloride (mg/l)	60.6	1.8	63.0	187.5
Sulphate (mg/l)	244.8	19.9	279.6	187.5
Sodium (mg/l)	33.7	1.0	35.8	N/A
Potassium (mg/l)	2.7	0.1	3.0	N/A

Based on these results PTL have concluded that the water within the pond is a slightly alkaline water, with a relatively high ionic content representative of "naturally-occurring" constituents of groundwater. PTL note that the defining characteristic of the pond water constituents is a high sulphate level and elevated chloride level when compared to groundwater from surrounding boreholes.

5.0 IDENTIFICATION OF EUROPEAN SITES WITHIN THE ZONE OF INFLUENCE OF THE PROJECT

Current guidance on undertaking EU Habitats Directive Article 6 Assessments advises that all European Sites occurring within a 15km radius of a project site should first be included within a Screening Assessment (Scott Wilson et al., 2006; DEHLG, 2010). Eight European Sites, comprising of five SPAs and othree SACs occur within the surrounding 15km radius of the site. These European Sites are shown and listed on Figures 5.1 & 5.2.

In addition to the European Sites occurring within a 15km area of the project site the DEHLG 2010 guidelines on Appropriate Assessment of Plans and Projects in Ireland also advise that where the potential exists for a hydrological pathway to occur between the project site and European Sites beyond the 15km distance, then these sites should also be included as part of the Screening Assessment. However, as there are no connections to other European Sites beyond a 15km radius of the project site, it is adequate to restrict this Screening to those sites occurring within the 15km radius.

The next step of the Screening Assessment is to identify which, if any of these European Sites, occur within the zone of influence of the project. As the nearest European Site (Rogerstown Estuary SAC & SPA) is located at a remote distance (approximately 7.5km) from the project site, the project will not have the potential to result in direct impacts to European Sites. Thus this Screening exercise focuses on investigating whether the proposed discharges will have the potential to result in indirect effects to European Sites or affect mobile species associated with European Sites beyond the boundaries of their designated conservation areas.

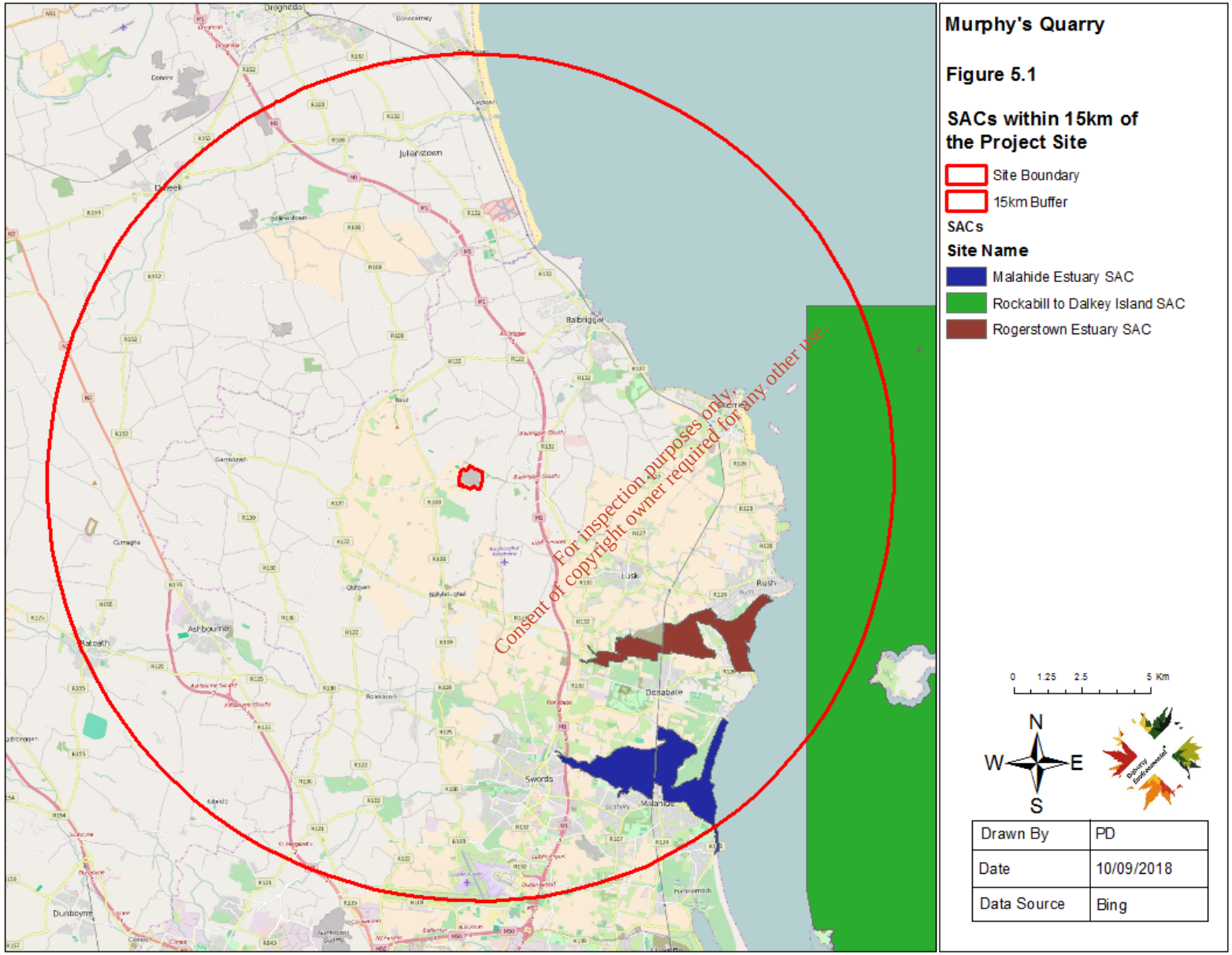
A source-pathway-receptor model has been used to establish which European Sites could occur within the zone of influence of potential indirect impacts. Under such a model the project, as described above, represents the source.

Potential impact pathways are restricted to hydrological pathways as these represent the principal emissions generated by activities at the project site. The potential for mobile qualifying species of surrounding European Sites to interact with the project site and immediate surrounding area is also included as a potential impact pathway.

The receptors represent European Sites and their associated qualifying features of interest.

European Sites and their associated qualifying features are likely to occur in the zone of influence of the project only where the above pathways establish a link between the study area and European Sites or where the project site is likely to play an important role in supporting populations of mobile species that are listed as special conservation interests/qualifying species for surrounding European Sites. Table 4.1 provides a determination as to whether each European Site within a 15km buffer distance of the project site occur within the zone of influence of the project. This determination has been undertaken in line with the following assessment questions:

- Is there a hydrological pathway linking the Project site to European Sites and does this pathway have the potential to function as an impact pathway?
- Are pathways connecting the project to Annex I qualifying habitats of European Sites?
- Does the project site have the potential to interact with or support Annex II qualifying species/special conservation interest bird species of these European Sites?



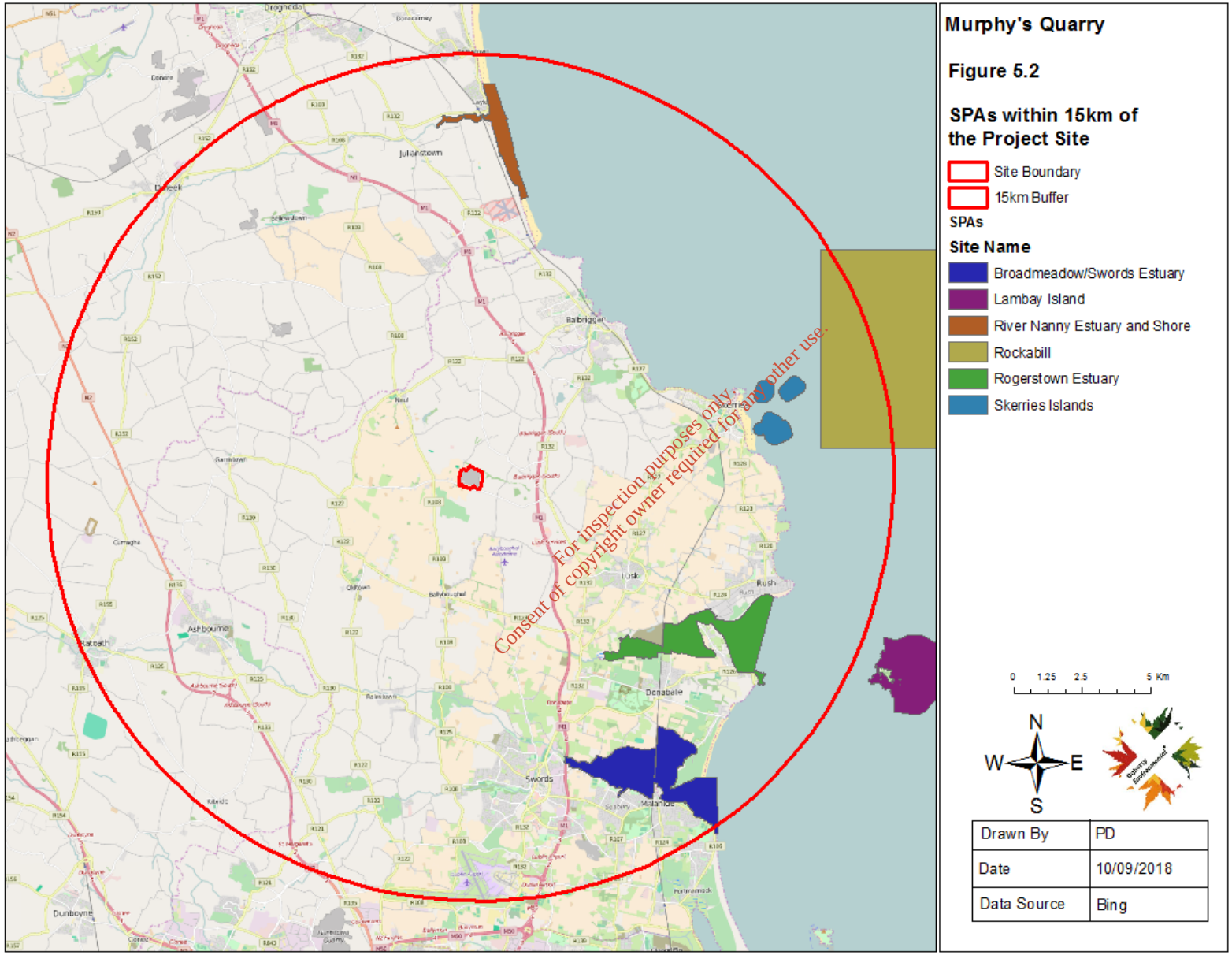


Table 5.1:Identification of European Sites occurring within the Zone of Influence of the Project

European Sites	**Distance from Project Site**	**Is there a Hydrological Pathway and does it have the potential to function as an Impact Pathway?**	**Are there Pathways connecting the project to Annex 1 qualifying habitats?**	**Does the Project have the potential to interact with Mobile Species?**	**Do European Sites occur within the Projects Zone of Influence?**
Rogerstown Estuary SAC	7.5km to the southeast	Yes the Rath Great Stream discharges to the Ballough Stream, which in turn discharges into this SAC. Figure 5.3 illustrates the hydrological pathway connecting the project site to this SAC.	Yes. The hydrological pathway connects the project to coastal qualifying habitats of this SAC.	No. No Annex II species are listed a qualifying features of interest for this SAC.	Yes. Give the hydrological pathway connecting the project to this SAC, it is deemed to occur within the zone of influence of the project.
Rogerstown Estuary SPA	7.5km to the southeast	Yes the Rath Great Stream discharges to the Ballough Stream, which in turn discharges into this SPA. Figure 5.3 illustrates the hydrological pathway connecting the project site to this SPA.	Yes. The hydrological pathway connects the project to coastal wetland habitats of the SPA.	Yes. Waters from the project will ultimately drain into coastal wetland habitats of the SPA that are relied upon by special conservation interest bird species of the SPA for foraging and roosting.	Yes. Give the hydrological pathway connecting the project to this SPA, it is deemed to occur within the zone of influence of the project.

Malahide Estuary SAC	10km to the south	No. This SAC is located in a separate surface water catchment to the project.	No. There is no connection between the project and the qualifying habitats of this SAC.	No. The project is located at a remote distance from this SAC and is within another surface water catchment. There will be no potential for the project to interact with the Annex II qualifying species of this SAC.	No. No potential impact pathways link the project site to this SAC.
Broadmeadow Estuary SPA	10km to the south	No. This SAC is located in a separate surface water catchment to the project.	No. There is no connection between the project and the wetland habitats of this SPA.	No. The project is located at a remote distance from this SPA and does not play an important role in supporting wetland bird species for which this SPA is designated.	No. No potential impact pathways link the project site to this SPA.
Skerries Islands SPA	10km to the east	No. This is an island SPA and there is no hydrological pathway between the project and this Site.	No. There is no connection between the project and the wetland habitats of this SPA.	No. The project is located at a remote distance from this SPA and does not play an important role in supporting wetland bird species for which this SPA is designated.	No. No potential impact pathways link the project site to this SPA.
Rockabill SPA	12.3km to the east	No. This is an island SPA and there is no hydrological pathway between the	No. There is no connection between the project and the wetland habitats of this	No. The project is located at a remote distance from this SPA and does not play an important role in	No. No potential impact pathways link the project

		project and this Site.	SPA.	supporting wetland bird species for which this SPA is designated.	site to this SPA.
River Nanny Estuary and Shore SPA	10km to the north	No. This SAC is located in a separate surface water catchment to the project.	No. There is no connection between the project and the wetland habitats of this SPA.	No. The project is located at a remote distance from this SPA and does not play an important role in supporting wetland bird species for which this SPA is designated.	No. No potential impact pathways link the project site to this SPA.
Rockabill to Dalkey Island SAC	12km to the east	No. This is an marine SAC and there is no hydrological pathway between the project and this Site.	No. There is no connection between the project and the qualifying habitats of this SAC.	No. The Annex II qualifying species of this SAC are marine mammals (Harbour Porpoise) and there is no connection between the project site and these animals.	No. No potential impact pathways link the project site to this SAC.

Table 5.1 above examines the relationship between the project site and the European Sites occurring within the surrounding area. As noted within this table no European Sites occur in close proximity to the project site. The site is hydrologically linked (see Figure 4.2: Hydrological Pathway) to Rogerstown Estuary SAC and Rogerstown Estuary SPA (to be referred to jointly as the Rogerstown Estuary European Sites).

These European Sites are located approximately 14km downstream from the project site. As a hydrological pathway exists between the project site and these European Sites, further examination of the projects potential to contribute to water quality pressures to the Rogerstown Estuary European Sites.

The remainder of this Screening will assess the potential for the project to result in likely significant effects to these two European Sites.

6.0 ROGERSTOWN ESTUARY EUROPEAN SITES BASELINE

6.1 ROGERSTOWN ESTUARY SPA

Rogerstown Estuary is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Greylag Goose, Light-bellied Brent Goose, Shelduck, Shoveler, Oystercatcher, Ringed Plover, Grey Plover, Knot, Dunlin, Black-tailed Godwit and Redshank. 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.

Rogerstown Estuary is an important winter waterfowl site and supports a population of Light-bellied Brent Goose of international importance (1,069) - all counts are mean peaks over the five winters 1995/96 – 1999/2000. A further 10 species have populations of national importance as follows: Greylag Goose (160), Shelduck (773), Shoveler (59), Oystercatcher (1,345), Ringed Plover (188), Grey Plover (229), Knot (2,454), Dunlin (2,745), Black-tailed Godwit (195) and Redshank (490). The Greylag Geese are part of a larger population which spends most of the winter on Lambay Island. Other species which occur regularly include Wigeon (358), Teal (346), Mallard (214), Red-breasted Merganser (30), Golden Plover (1,059) Lapwing (2,129), Sanderling (50), Curlew (505) and Turnstone (77). Large numbers

of gulls including Herring Gull, Great Black-backed Gull and Black-headed Gull are attracted to the area, partly due to the presence of an adjacent local authority landfill site. Little Egret, a species which has recently colonised Ireland, also occurs at this site.

The water quality in the estuary has been classed as eutrophic and the Water Framework Directive (WTD) status has been classified by the EPA at Bad status and "at risk" of not achieving good status.

6.2 ROGERSTOWN ESTUARY SAC

Rogerstown Estuary SAC 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:

Estuaries

- Tidal Mudflats and Sandflats
- *Salicornia* Mud
- Atlantic Salt Meadows
- Mediterranean Salt Meadows
- Marram Dunes (White Dunes)
- Fixed Dunes (Grey Dunes)*

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 Common 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.

This site is a good example of an estuarine system, with all typical habitats represented, including several listed on Annex I of the E.U. 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.

6.3 EXISTING THREATS AND PRESSURES

The Natura 2000 – Standard Data Forms for the Rogerstown Estuary SPA and the Rogerstown Estuary SAC have identified existing threats and pressures to the conservation status of these European Sites. These threats and pressures have been categorized as low, medium and high threats and pressures. The medium and high threats and pressures to the conservation status of these European Sites are as follows:

- invasive non-native species;
- golf course
- Erosion;
- sea defense or coast protection works, tidal barrages;
- dykes and flooding defense in inland water systems;
- use of biocides, hormones and chemicals;
- roads, motorways;
- grazing; and
- Discharges

Of the above threats and pressures the most relevant to this assessment are discharges, which have been identified as having a medium impact on the Rogerstown Estuary European Sites.

6.4 FEATURES OF ROGERSTOWN ESTUARY EUROPEAN SITES OCCURRING WITHIN THE SPHERE OF INFLUENCE OF THE PROJECT

The Rogerstown Estuary European Sites represent the only European Sites likely to occur within the zone of influence of the project. The next step in this Screening Assessment identifies the qualifying features of interest/special conservation interests occurring within the sphere of influence of the project.

All coastal qualifying features of interest/scis that could be influenced by freshwater inputs draining into these European Sites are considered to occur within the zone of influence of the project. Table 6.1 & 6.2 below lists each of the special conservation interests of the Rogerstown Estuary SPA and qualifying features of interest of the Rogerstown Estuary SAC and identifies those that occur within the sphere of influence of the project.

Table 6.1: Identification of Special Conservation Interests of the Rogerstown Estuary SPA occurring within the sphere of influence of the Project

Special Conservation Interest	Does the special conservation interest occur within the sphere of influence of the project*
Greylag Goose	Yes. This species is known to occur in the Rogerstown Estuary and use mudflats downstream of the project site
Light-bellied Brent Goose	Yes. This species is known to occur in the Rogerstown Estuary and use mudflats downstream of the project site
Shelduck	Yes. This species is known to occur in the Rogerstown Estuary and use mudflats downstream of the project site
Shoveler	Yes. This species is known to occur in the Rogerstown Estuary and use mudflats downstream of the project site
Oystercatcher	Yes. This species is known to occur in the Rogerstown Estuary and use mudflats downstream of the project site
Ringed Plover	Yes. This species is known to occur in the Rogerstown Estuary and use mudflats downstream of the project site
Grey Plover	Yes. This species is known to occur in the Rogerstown Estuary and use mudflats downstream of the project site
Knot	Yes. This species is known to occur in the Rogerstown Estuary and use mudflats downstream of the project site
Dunlin	Yes. This species is known to occur in the Rogerstown Estuary and use mudflats downstream of the project site
Black-tailed Godwit	Yes. This species is known to occur in the Rogerstown Estuary and use mudflats downstream of the project site
Redshank	Yes. This species is known to occur in the Rogerstown Estuary and use mudflats downstream of the project site
Wetland Habitat	Yes. Wetland habitat in the form of mudflats and estuaries occur immediately adjacent to the project site.

Table 6.2: Identification of Qualifying Features Of Interest of the Rogerstown Estuary SAC occurring within the sphere of influence of the Project

Qualifying features of interest	Does the qualifying feature of interest occur within the sphere of influence of the project
Estuaries	Yes. Rogerstown Estuary occur immediately adjacent to the project site.
Mudflats and sandflats not covered by seawater at low tide	Yes. Mudflat habitats occur immediately adjacent to the project site.

Salicornia and other annuals colonising mud and sand	No. No examples of this habitat occur within or adjoining the project site.
Atlantic salt meadows	No. No examples of this habitat occur within or adjoining the project site.
Mediterranean salt meadows	No. No examples of this habitat occur within or adjoining the project site.
Shifting dunes along the shoreline	No. No examples of this habitat occur within or adjoining the project site.
Fixed Coastal dunes	No. No examples of this habitat occur within or adjoining the project site.

From Table 6.1 and 6.2 above the following special conservation interests/qualifying features of interest of the Rogerstown Estuary European Sites occur within the zone of influence of the project:

1. All special conservation interest bird species and wetland habitats of the SPA

2. Estuaries and Mudflat qualifying habitats of the SAC.

The remainder of this Screening Assessment will focus on the potential for the project to result in likely significant effects to these features of interest.

7.0 DESCRIPTION OF ELEMENTS OF THE PROJECT LIKELY TO GIVE RISE TO IMPACTS TO FEATURES OF INTEREST

In the event that the project results in the discharge of pollutants to the Rogerstown Estuary European Sites there will be potential for the discharge operations to undermine the status of estuarine and mudflat habitats and undermine the quality of these habitats to support special conservation interest bird species of the Rogerstown Estuary European Sites.

7.1 IN-COMBINATION EFFECTS

Section 6.3 above lists the known existing threats and pressures to the conservation status of the Rogerstown Estuary European Sites. Of these the most relevant to the current project is the adverse effect discharges have been identified as having on the status of the European Sites. In the event of polluted surface waters being discharged from the project site there will be a potential for the project to combine with and exacerbate the adverse effect poor quality surface water discharges are having on these European Sites.

7.2 POTENTIAL EFFECTS TO CONSERVATION OBJECTIVES

The project will be deemed to have the potential to result in likely significant effects to the Rogerstown Estuary European Sites if it has the potential to result in adverse effects to the Site Specific Conservation Objectives (SSCOs) of the features of interest of the Rogerstown Estuary European Sites occurring within the zone of influence of the project. The detailed SSCOs for these features of interest are outlined in Table 7.1 below and an assessment of the project's potential to undermine these SSCOs and their associated attributes and targets is provided.

Figure 7.1: Assessment of likely significant effects to the Conservation Objectives of Qualifying Interests occurring within the sphere of influence of the Project

Attribute No.	Attribute	Target	Will the project result in likely significant effects to Conservation Objectives
Estuaries			
1	Habitat area	The permanent habitat area is stable or increasing, subject to natural processes.	The project will not have the potential to result in changes to the extent of estuarine habitat occurring within the Rogerstown Estuary SAC.
2	Community distribution	The Subtidal fine sand community complex should be conserved in a natural condition	The water quality of the Rogerstown Estuary European Sites is already known to be perturbed and is classed by the EPA at Bad overall status and discharges to the estuary and this habitat have been identified as a threat/pressure to its conservation status. Poor water quality can result in changes to the benthic communities of estuarine habitat. Any contribution to the threats and pressures to water quality within the estuary as a consequence of discharges from the project site will have the potential to undermine the achievement of this target. However ongoing monitoring of the water quality within the pond suggests that the water quality constituents of this water is representative of a "naturally-occurring" groundwater. Elevated sulphate and chloride have been identified in the pond water when compared to other groundwater monitoring boreholes surrounding the quarry site. However, given the location of the discharge point at the head of the Ballough catchment, the distance of 14km between the discharge point and wetland habitats of the SPA, and the additional assimilative capacity afforded along the catchment with inputs from other watercourses feeding into the Ballough catchment it is considered that the elevated sulphate and chloride in the pond water will be assimilated within the catchment and will not be apparent downstream at the estuary. Given the above the discharge of pond waters from the project site, at greenfield rates will not have the potential to result in adverse effects to water quality within the estuary. The avoidance of adverse effects to water quality in the estuary will in

			turn ensure that the discharge of these waters will not have the potential to adversely affect the targets for the distribution of special conservation interest bird species of the SPA.
Mudflats			
3	Habitat area	The permanent habitat area is stable or increasing, subject to natural processes.	The project will not have the potential to result in changes to the extent of mudflat habitat occurring within the Rogerstown Estuary European Sites.
4	Community distribution	The Muddy fine sand community and Intertidal fine sand community complex should be conserved in a natural condition.	For reasons outlined for Attribute No. 2 above the project will have the potential to undermine this target.
Special conservation interest bird species			
5	Population trend	Long term population trend stable or increasing	Any discharge of polluted surface water to Rogerstown Estuary European Sites will have the potential to undermine water quality and the quality of mudflat habitats within the estuary and could in turn negatively affect the status of habitats and foraging resources relied upon by these bird species. Such adverse effects could, over time, result in a decline in the long-term population trend supported by the SPA downstream of the project site. However for the reasons outlined for Attribute No. 2 above the discharge of clean and settled water from the settlement ponds at the project site and greenfield rates will not have the potential to undermine the status of these habitats to support special conservation interest bird species of the SPA and will in turn not have the potential to result in changes to the population trends of these species.
6	Distribution	No significant decrease in the range, timing and intensity of use of	For reasons outlined for Attribute No. 2 above the discharge of settled water from the ponds at the project site at greenfield runoff rates will have the potential to undermine the targets for this attribute.

		areas by special conservation interest bird species of the SPA.	

8.0 ASSESSMENT OF THE PROJECTS POTENTIAL TO RESULT IN LIKELY SIGNIFICANT EFFECTS

Table 7.1 provides a Screening Assessment in line with EU Guidance (2001) Assessment Criteria used to examine the potential of the project to adversely impact upon European Sites. These assessment criteria are used to establish whether the project has the potential to result in likely significant effects to the Rogerstown Estuary European Sites .

Table 10.1: Assessment of Effects

Assessment Criteria	
Describe any likely direct, indirect or secondary impacts of the project (either alone or in combination with other plans or projects) to the Rogerstown Estuary European Sites:	
Size and Scale	The project is considered to be small in size and scale.
Land-take	The project will not result in the loss of any qualifying habitats of the Rogerstown Estuary European Sites or any habitats upon which special conservation interest bird species of the SPA rely.
Distance from European sites or key features of the site	The project site is located approximately 14km, upstream of the Rogerstown Estuary European Sites.
Resource requirements	No resources associated with the Rogerstown Estuary European Sites will be required for, or utilized by the project.

Emissions	The project will not result in emissions with potential to result in pollution to the Rogerstown Estuary European Sites. For the reasons outlined in Table 7.1 above the discharge of pond water from the project will not have the potential to result in adverse water quality effects downstream at the Rogerstown Estuary European Sites.
Excavation requirements	No excavations will be required for the project.
Transportation requirements	The project will not result in changes to transport levels in the vicinity of the site.
Duration of construction, operation etc.	It is anticipated that the discharge of the pond waters will be completed within 12 to 15 weeks following the commencement of discharge.
In-Combination Effects	As the discharge of pond water from the ponds at the project site is not anticipated to have the potential to result in adverse water quality effects downstream at the estuary, it will not have the potential to combine with other land uses and known threats and pressures to result in cumulative effects to the Rogerstown Estuary European Sites.
Describe any likely changes to the Rogerstown Estuary European Sites arising as a result of:	
Reduction of habitat area	The project will not result in the loss of any qualifying habitats.

Disturbance of key species	The project will not result in disturbance to special conservation interest bird species of the SPA.
Habitat or species fragmentation	The project will not result in any habitat or species fragmentation.
Reduction in species density	The project will not result in a reduction in the densities of special conservation interest bird species of the SPA (see Table 7.1 above).
Changes in key indicators of conservation status	The project will have the potential to result in changes to key indicators of the conservation status of qualifying interests of the SAC or SPA (see Table 7.1 above).
Describe any likely impacts on the European Site as a whole in terms of:	
Interference with key relationships that define the structure and function of the site	As outlined in Table 7.1 above the project will not have the potential to interfere within the key attributes that define the conservation status of the qualifying feature of interest of the Rogerstown Estuary European Sites occurring within the zone of influence of the project.
Describe from the above the elements of the project or plan or combination of elements, where the above impacts are likely to be significant or where the scale of magnitude of impacts is not known.	

It has been concluded that likely significant effects to the Rogerstown Estuary European Sites will not arise as a result of the implementation of the proposed project. Therefore a Stage 2 Appropriate Assessment is not required.

9.0 SCREENING CONCLUSION

The proposed project has been screened for its potential to result in likely significant effects to the conservation status and integrity of surrounding European Sites. As this project site is not located within or adjoining European Sites, a Source-Pathway-Receiver model was used to identify potential impact pathways linking the project site to European Sites. The potential impact pathways identified were restricted to hydrological pathways.

Two European Sites, the Rogerstown Estuary SAC and the Rogerstown Estuary SPA have been identified as occurring within the zone of influence of the project.

The Screening assessed the potential for the project to result in likely significant effects to the Conservation Objectives of qualifying feature of interest of the SAC and SPA occurring within the zone of influence of the project. This was undertaken by examining whether the project has the potential to undermine the attributes and targets that define the favourable conservation status of these qualifying feature of interest.

It was found during this examination that the project will not have the potential to undermine the conservation status of the qualifying features of interest. This is based on the constituents of the pond water which is representative of “naturally-occurring” groundwater. While elevate sulphate and chloride have been identified in the pond water it is considered that their will be sufficient assimilative capacity within the Ballough catchment downstream of the discharge point to ensure that the concentration of these constituents are reduced to normal background levels downstream at the Rogerstown Estuary European Sites. In light of this the discharge of the pond water will not have the potential to undermine water quality in the Ballough catchment or downstream at the Rogerstown Estuary European Sites.

The avoidance of impacts to water quality will ensure that the project does not have the potential to result in likely significant effects to the Conservation Objectives of the qualifying features of interest of the SAC and SPA occurring within the project's zone of influence and will not adverse effect the integrity of these European Sites.

In conclusion this Screening for Appropriate Assessment has resulted in a finding that there is no potential for the project to result in significant effects to any other European Sites and as such a Stage II Appropriate Assessment is not required.

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