



Appropriate Assessment Screening Report

Section 146B Alteration Request (ABP PA92.319013)

Medite DAC Europe

Redmondstown, Clonmel, County Tipperary

Prepared by:

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Basis of Report

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Acronyms and Abbreviations

AA	Appropriate Assessment
NIS	Natura Impact Statement
SAC	Special Area of Conservation
SPA	Special Protection Area
LSE	Likely Significant Effect(s)
EclA	Ecological Impact Assessment



1.0 INTRODUCTION

1.1 Background

SLR Consulting Ireland (SLR) was commissioned by the Client (Medite DAC Europe), to prepare an Appropriate Assessment (AA) Screening report to assess the likelihood of significant effects on European sites resulting from the proposed alterations to the permitted development of the replacement of renewable energy plant at the existing MDF manufacturing plant in Redmondstown, Clonmel, Co. Tipperary which is a permitted development under ABP Ref PA92.319013, as granted by An Bord Pleanála on 13th November 2024.

1.2 Project Overview

Following on the tender procedure for procuring the permitted development, Medite wish to request alterations to the permitted design (ABP Ref. PA92.319013) under Section 146B of the Planning and Development Act 2000, as amended.

1.3 Site Description

The lands of the subject site are that of a long-established industrial facility Medite DAC Europe, located in the townland of Redmondstown, Clonmel, Co. Tipperary.

The subject site is located approximately 4 km east of the centre of Clonmel town and approximately 0.9 km north of the N24. The site is accessed through a local road that connects directly to the N24. The subject site is well screened and the existing buildings within the industrial facility are situated 50m back from the local access road and are largely obscured from view due to the presence of abundant shrub and tree plantations at the site boundaries.

The River Anner flows to the east of the subject site and connects as a tributary to the River Suir, which is approximately 1 km south of the subject site. The River Suir (including the River Anner) is part of the Lower River Suir SAC.

An industrial area is located south of the subject site, bounded by the N24 and accessed through entrances positioned along this national primary road.

The existing site is divided into development areas 1, 2, 3 and 4 within the planning application (ABP Ref. PA92.319013).

The site is composed of the main production plant building and materials storage areas. With the exception of the log storage area all areas associated with the facility's operations are located on hardstanding. A number of landscaped areas are also located along the perimeter of the site.

The existing development areas 1, 2, 3 and 4 are as follows:

- Development Area 1 includes portions of the current Log yard, the Fuel yard, and Chip yard, and contains the following structures and plant;
 - Debarker building (ITEM 1.10)
 - Debarker Infeed Conveyor (ITEM 1.10A)
 - Outdoor Fuel Storage / Fuel Shed (ITEM 1.11)
 - Chip storage silos (ITEM 1.24)
 - Dust silos (ITEM 1.27)
 - Edge trim Silo (ITEM 1.26)
 - MTX Building and associated plant (ITEM 1.19)



- Development Area 2 includes a small area planted with trees (c. 0.42 ha) and elements of Production Line 1. It also contains the following structures and plant;
 - Line 1 Boiler building (in which the 2 biomass boilers area is housed) (Item 1.6)
 - Line 1 Dryer building (in which the 2 dryers area is housed) (Item 1.7)
 - Line 1 Ancillary building (including gas fired thermal fluid heater room)
 - DAF Building
 - Production Chip Screening Plant (Item 1.12 CHIP STORAGE / YARD)
 - LPG tank
 - Chemical Storage Building (Item 1.15)
 - External laydown/storage area
- Development Area 3 contains the following structures and plant;
 - Line 2 Thermal Fluid Heater and associated plant (ITEM 1.25)
- Development Area 4 contains the proposed native woodland planting area.

1.3.1 Existing Operations

Meditate Europe DAC was granted an Industrial Emission Licence (P0027-04) by the EPA on the 7th March 2017. This sets a range of emission limit values (ELVs) for air, dust, noise, and surface water, and they apply parameters regarding monitoring and reporting of the same. Environment Management System Manual (ISO 14001:2015) is also in place governing site operations.

1.4 Report Purpose

The purpose of this report is to provide supporting information to provide the information for the competent authority the Competent Authority, in this case An Coimisiún Pleanála, to carry out a screening assessment for likely significant effects on European sites resulting from the proposed alterations to the permitted renewable energy plants to replace the existing boilers system at the existing MDF manufacturing plant, in accordance with and fulfillment of the requirements of Article 6 of the Habitats Directive and derived Regulations.

1.5 Relevant Legislation and Policy

The requirement for AA screening and AA is set out in the Habitats Directive (Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, which is transposed into Irish law primarily through the European Communities (Birds and Natural Habitats) Regulations 2011 –21, (S.I. 477 of 2011, as amended) (“Birds and Natural Habitats Regulations”)) and the Planning and Development Acts 2000 -22. Further details are provided in **Appendix A**

1.6 Statement of Authority

SLR Associate Ecologist Michael Bailey prepared this report and Aislinn O’Brien carried out the technical review.

Michael Bailey holds a BSc (Hons) in Biology and Ecology from the University of Ulster, and an MSc in Quantitative Conservation Biology from the University of the Witwatersrand, Johannesburg, South Africa. Michael is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM). Michael is an experienced consultant ecologist with over 20 years of field and research experience with mammal, bird, bat and invasive species surveys in Ireland, the UK and Africa. He has prepared Appropriate Assessments



and Ecological Impact Assessments for a wide range of infrastructure, mining and extractive industry, and renewable energy projects.

Aislinn O'Brien, MCD, MSc, MIPI, MRTPI. Aislinn is a chartered town planner with over 18 years professional planning experience. During this time Aislinn has project managed and coordinated numerous planning applications and EIARs.



2.0 METHODOLOGY

2.1 General Approach

The methodology used in this report is based on guidance provided by the National Parks and Wildlife Service (NPWS, 2010), the Office of the Planning Regulator (OPR, 2021) and EC Guidance (EC, 2018) (EC, 2020) (EC, 2021) on the application of Article 6 of the Habitats Directive.

The 2021 EC guidance describes a series of stages and steps which should be completed when carrying out the assessment and these are followed here with minor modifications. The assessment applies only to European sites. More specifically, it only applies to the qualifying interest features of such sites i.e. the features which are the reason that the site was designated. A general description of the approach to appropriate assessment screening and appropriate assessment is provided in **Appendix B: Appropriate Assessment Process**.

2.2 Baseline Information

2.2.1 Ecological Desk Study

SLR undertook an ecological desk study comprising an online search for (i) SACs and SPAs within 15km of the project site; (ii) Annex I habitats and Annex II species (of the Habitats Directive) within 10km of the Project site; and (iii) Annex I bird species (of the Birds Directive) within the zone of influence from the Site. The zone of influence was determined using the Source – Pathway – Receptor (S-P-R) model to determine the area over which potential links to European sites and species populations may occur due to changes to water quality, changes to hydrology, or impacts on mobile or migratory species populations arising from the Project.

Online resources included ecology data held by the National Biodiversity Data Centre¹, the National Parks and Wildlife Service², the Environmental Protection Agency, the Ireland Wetland Bird Survey (IWeBS) and Ordnance Survey Ireland (Geohive).

2.3 Sources of Information

2.3.1 For the Project Alone

Sources of information for the assessment of the Project 'alone' include:

- Article 17 and Article 12 reports completed by the National Parks and Wildlife Service³;
- Site Synopses, Conservation Objectives and Standard Data Forms for the Natura 2000 sites⁴; and
- Environmental Protection Agency (EPA) Maps⁵.

2.3.2 For the Project in Combination

Sources of information for the plans and projects for the 'in-combination' assessment were as above and also include:

¹ [Maps - Biodiversity Maps](#) (Last accessed Mayh 2025)

² [Protected Sites in Ireland | National Parks & Wildlife Service](#) (Last accessed May 2025)

³ <https://www.npws.ie/publications/article-17-reports?msclkid=0c19d260b00a11ecaf5a935da63f219b> (Last accessed May 2025)

⁴ <https://www.npws.ie/protected-sites> (Last accessed May 2025)

⁵ <http://gis.epa.ie/> (Last accessed May 2025)



- Clonmel and Environs Local Area Plan 2024 - 2030⁶
- Tipperary County Development Plan 2022 - 2028⁷ and;
- Tipperary County Council Planning Portal⁸ and myplan.ie⁹ were accessed for information on other projects and plans.

⁶ <https://www.tipperarycoco.ie/planning-and-building/local-area-plan-consultation/clonmel-and-environs-local-area-plan-2024-2030> (Last accessed May 2025)

⁷ [Tipperary County Development Plan 2022-2028 | Roscommon County Development Plan](https://www.tipperarycoco.ie/planning-and-building/local-area-plan-consultation/clonmel-and-environs-local-area-plan-2024-2030) (Last accessed May 2025)

⁸ <https://www.eplanning.ie/RoscommonCC/searchtypes> (Last accessed May 2025)

⁹ <https://myplan.ie/> (Last accessed May 2025)



3.0 STAGE ONE: SCREENING

3.1 Step One: Management of any European Site

The proposed project consists of proposed alterations to the design and layout of the new renewable energy plants to replace the existing boilers system at the existing MDF manufacturing plant in Redmondstown, Clonmel, Co. Tipperary. Therefore, it is not connected with, or necessary for, the management of a European site.

3.2 Step Two, Part 1: Project Description

3.2.1 Permitted Development Overview

Medite DAC Europe proposes to alter elements of the Permitted Development ABP PA92.319013, a strategic infrastructure development (SID). The application site boundary has an area of 29.7ha., which is part of the overall Medite landholding of 69.0 Ha.

Medite currently operates two production lines producing up to 425,000m³ of finished MDF product annually. MDF is produced on the site using up to 650,000 tonnes of product feedstock per annum. The plant has two biomass boilers and a gas-fired thermal fluid heater providing thermal energy to production line 1 and a biomass fired thermal fluid heater providing thermal energy to production line 2.

The permitted development under the PA92.319013 planning application will replace all three existing aging biomass fired thermal energy systems serving both of Medite's two production lines, specifically:

- the two-wood biomass fired boilers (18MW each) (ITEM 1.6) serving Production Line 1.
- the wood biomass fired Thermal Fluid Heater (19MW) serving Production Line 2. (ITEM 1.9).

The Permitted Development (**Figure 1**) will also provide the thermal energy currently provided by the natural gas-fired Thermal Fluid Heater (TFH) (6MW) serving Production Line 1, which will be retained for backup purposes or in the event of disruption in the biomass fuel market.

A Natura Impact Statement was prepared for the development permitted under PA92.319013 (SLR 2024).

The assessment of potential impacts arising from the construction and operational phases of the project concluded that that likely significant effects arising from unmitigated changes in air and water quality could not be excluded for four European sites (Lower River Suir SAC, Nier Valley Woodlands SAC, Comeragh Mountains SAC and River Barrow and River Nore SAC), and therefore the assessment was progressed to Stage 2 Appropriate Assessment (NIS).

The mitigation measures previously proposed in the NIS are implemented by way of a planning condition under PA92.319013.

3.2.2 Alterations to Permitted Development

All the principal elements of the permitted development will remain the same as outlined in the PA92.319013 planning application, including all mitigation measures and planning conditions.

The alterations to the permitted development (ABP Ref. PA92.319013) are outlined in the site notice provided in **Table 1** below and details of the alternations are provided in **Table 2** and **Table 3**. (refer to drawings PL08B Rev1, PL14 R1, PL15 R1 and PL16 R1 enclosed with this request).



Table 1: Summary of Design alterations to Permitted Development

The table below summarises the proposed alterations to the permitted development.

~~Blue strikethrough~~ indicates the element of the site notice to be changed, whilst **red text** indicates the proposed alteration.

Permitted Development Area (ABP Ref. PA92.319013)	Alterations
<p>The proposed development will consist of the following: The replacement of the existing three wood biomass fired thermal energy systems serving MEDITE's two production lines with, 2 no. renewable energy, wood biomass fired Thermal Fluid Heaters with thermal capacity of 60MW and 30MW respectively. The proposed development will include:</p> <ul style="list-style-type: none"> The decommissioning of the two existing wood biomass fired boilers (18MW each) that serve Production Line 1 (Existing Height 39m). This equipment will be retained on site. The decommissioning of the existing single wood biomass fired Thermal Fluid Heater (19MW) serving Production Line 2 (Stack Height 19.3m). This existing Thermal Fluid Heater equipment for Line 2 will be dismantled and removed from the site. The existing LPG Storage Tank will be decommissioned and retained on site. An existing silo will be dismantled and retained on site. The construction of 1 no. renewable energy, wood biomass fired Thermal Fluid Heater with thermal input capacity of 60MW, this Line 1 Energy Plant is 442¹⁰702m², with a stack height of 33m. Other infrastructure proposed to support the proposed Line 1 energy plant will include: <ul style="list-style-type: none"> 1 no. Line 1 Wet Fuel Metering Bin (254.5-292m²) 1 no. Line 1 Energy System Fuel Feed Conveyor (38.0m²) 1 no. Line 1 Dry Electrostatic Precipitator (286.9m²) 1 no. Line 1 Hot Gas Duct (286.9m²) 1 no. Line 1 Start Up Stack (10.8m² and height 30m) 1 no. Line 1 Sander Dust Silo (28.3m²) 	<p>The proposed development will consist of the following: The replacement of the existing three wood biomass fired thermal energy systems serving MEDITE's two production lines with, 2 no. renewable energy, wood biomass fired Thermal Fluid Heaters with thermal capacity of 60MW and 30MW respectively. The proposed development will include:</p> <ul style="list-style-type: none"> The decommissioning of the two existing wood biomass fired boilers (18MW each) that serve Production Line 1 (Existing Height 39m). This equipment will be retained on site. The decommissioning of the existing single wood biomass fired Thermal Fluid Heater (19MW) serving Production Line 2 (Stack Height 19.3m). This existing Thermal Fluid Heater equipment for Line 2 will be dismantled and removed from the site. The existing LPG Storage Tank will be decommissioned and retained on site. An existing silo will be dismantled and retained on site. The construction of 1 no. renewable energy, wood biomass fired Thermal Fluid Heater with thermal input capacity of 60MW, this Line 1 Energy Plant is 702m²-592.2m², with a stack height of 33m. Other infrastructure proposed to support the proposed Line 1 energy plant will include: <ul style="list-style-type: none"> 1 no. Line 1 Wet Fuel Metering Bin (292m²)(213.1m²) 1 no. Line 1 Energy System Fuel Feed Conveyor (38.0m²)(31.4m²)

¹⁰ Strikethrough = Error in original calculation



Permitted Development Area (ABP Ref. PA92.319013)	Alterations
<ul style="list-style-type: none"> 1 no. Line 1 Thermal Fluid Piping (40.9 130.2m²) 1 no. Line 1 Steam Generator (47.5m²) Modifications to Line 1 Dryer System (505.7m²) 1 no. Line 1 Bunded Oil Storage (66.5m²) <ul style="list-style-type: none"> The construction of 1 no. renewable energy, wood biomass fired Thermal Fluid Heater with thermal input capacity of 30MW, this Line 2 Energy Plant is 109m², with a stack height of 18.5m). Other infrastructure proposed to facilitate the operation of the proposed Line 2 energy plant will include: <ul style="list-style-type: none"> 1 no. Line 2 Dry Electrostatic Precipitator (25.6 m²) 1 no. Line 2 Hot Gas Duct (86.9m²) 1 no. Line 2 Start Up stack (23.0m² and height 30m) 1 no. Line 2 Thermal fluid Piping (21.4m²) The development of new wood biomass fuel reception infrastructure adjacent to the existing wood biomass fuel reception area which will require the development of 1 no. Fuel Reception Unit (35m²), 1 no. Fuel infeed hopper (18.6m²), 1 no. Walking Floor Infeed System (202.3 446.4m²), 1 no. conveying System(#1) (520m²), 200m in length of conveying with height varying from ground to 20.8m, Conveying Systems #2 (from Storage Building to energy Systems), (245295.9m²) to Line 1 Energy Plant, 266m length of conveying with height varying from ground to max of 22.5m, and to Line 2 Energy Plant (77.5m²) 44m length of conveying with height varying from ground to max of 20.9m. Modifications to existing pneumatic (Dry Fuel) Systems, including blowers, fans & filters, and associated infrastructure. These modifications will include new pneumatic Transport Ducts, #1 Length = 161.5m x Ø150mm pipe, #2 Length = 202.9m x Ø150mm pipe, Edge Trim Silo, including associated filter plant (38.4m²). The Ø150mm pipe that currently connects the production process to the existing Edge Trim Silo which will be redirected to the new Edge Trim Silo. The existing hopper within this area will be removed. 	<ul style="list-style-type: none"> 1 no. Line 1 Dry Electrostatic Precipitator (286.9m²) (271.9m²) 1 no. Line 1 Hot Gas Duct (286.9m²) (255.0m²) 1 no. Line 1 Start Up Stack (10.8m²) 9.0m² and height 30m) 1 no. Line 1 Sander Dust Silo (28.3m²) (9.0m²) 1 no. Line 1 Thermal Fluid Piping (130.2m²) (32.1m²) 1 no. Line 1 Steam Generator (47.5m²) (59.4m²) Modifications to Line 1 Dryer System (505.7m²) 1 no. Line 1 Bunded Oil Storage (66.5m²) (72.5m²) <ul style="list-style-type: none"> The construction of 1 no. renewable energy, wood biomass fired Thermal Fluid Heater with thermal input capacity of 30MW, this Line 2 Energy Plant is 109m², with a stack height of 18.5m). Other infrastructure proposed to facilitate the operation of the proposed Line 2 energy plant will include: <ul style="list-style-type: none"> 1 no. Line 2 Dry Electrostatic Precipitator (25.6 m²) 1 no. Line 2 Hot Gas Duct (86.9m²) 1 no. Line 2 Start Up stack (23.0m² and height 30m) 1 no. Line 2 Thermal fluid Piping (21.4m²) The development of new wood biomass fuel reception infrastructure adjacent to the existing wood biomass fuel reception area which will require the development of 1 no. Fuel Reception Unit (35m²) (35.77m²), 1 no. Fuel infeed hopper (18.6m²) (8.5m²), 1 no. Walking Floor Infeed System (202.3 m²), 1 no. conveying System(#1) (520m²) (333.0m²), 200m 179.9m in length of conveying with height varying from ground to 20.8m 13.4m, Conveying Systems #2 (from Storage Building to energy Systems), (245m²) to Line 1 Energy Plant, 266m 220.9m length of conveying with height varying from ground to max of 22.5m, and to Line 2 Energy Plant (77.5m² 11m²) 44m 10m length of conveying with height varying from ground to max of 20.9m 11m. Modifications to existing pneumatic (Dry Fuel) Systems, including blowers, fans & filters, and associated infrastructure. These modifications will include new pneumatic Transport Ducts, #1 Length =



Permitted Development Area (ABP Ref. PA92.319013)	Alterations
<p>The development will also include:</p> <ul style="list-style-type: none"> Any other ancillary development including all pipes/ducts and supporting infrastructure necessary to connect the renewable energy systems to the existing facility enabling the transfer of thermal energy to the production lines and the provision of a new steam generator and steam piping to connect the new energy system to the existing steam pipe infrastructure. <p>Ancillary development will also include:</p> <ul style="list-style-type: none"> The provision of 2 no. temporary construction compounds, including hardstanding, car-parking and staff welfare facilities. Removal of 0.42ha. of existing mixed woodland at the western portion of the site and the planting of 0.42ha. of native woodland along the northern boundary of the Site. The provision of additional non-permeable hardstanding within the site covering a total area of 1.1ha. All associated site works including engineering, landscaping, connections to existing surface water and wastewater systems, services and boundary treatment, necessary to facilitate the development. <p>This application relates to development for the purposes of an activity requiring an Industrial Emissions Licence. This application is also accompanied by an Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS). The proposed development is located within close proximity to a site on the Record of Monument and Places RMP sites, including RMP TS083-010 Ringfort-Rath, which bounds the site to the east.</p>	<p>161.5m x Ø150mm pipe, #2 Length = 202.9m 257.2m x Ø150mm pipe, Edge Trim Silo, including associated filter plant (38.4m²) 51.8m². The Ø150mm pipe that currently connects the production process to the existing Edge Trim Silo which will be redirected to the new Edge Trim Silo. The existing hopper within this area will be removed.</p> <p>The development will also include:</p> <ul style="list-style-type: none"> Any other ancillary development including all pipes/ducts and supporting infrastructure necessary to connect the renewable energy systems to the existing facility enabling the transfer of thermal energy to the production lines and the provision of a new steam generator and steam piping to connect the new energy system to the existing steam pipe infrastructure. <p>Ancillary development will also include:</p> <ul style="list-style-type: none"> The provision of 2 no. temporary construction compounds, including hardstanding, car-parking and staff welfare facilities. Removal of 0.42ha. of existing mixed woodland at the western portion of the site and the planting of 0.42ha. of native woodland along the northern boundary of the Site. The provision of additional non-permeable hardstanding within the site covering a total area of 1.1ha. All associated site works including engineering, landscaping, connections to existing surface water and wastewater systems, services and boundary treatment, necessary to facilitate the development. <p>This application relates to development for the purposes of an activity requiring an Industrial Emissions Licence. This application is also accompanied by an Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS). The proposed development is located within close proximity to a site on the Record of Monument and Places RMP sites, including RMP TS083-010 Ringfort-Rath, which bounds the site to the east.</p>



3.2.1 Details of Proposed Alterations to Permitted Development

3.2.1.1 Development Area 1

The proposed alterations of Development Area 1 are detailed in Table 2, which provides a breakdown of the detailed description of each item. Table 2 should be read in is to read in conjunction with the drawings PL08B Rev1, PL14R1 and PL15R1 enclosed with this request.

Table 2: Development Area 1 Proposed Alteration Details

No.	Permitted Item	Description	No. (R)	Proposed Alteration Dimensions	Summary of Alterations
ITEM 2.1	1 x Fuel Reception Units 7.0m x 5.0m x 5.5mH Area = 35m ²	A new Fuel Reception unit will be constructed adjacent to the existing Fuel Reception. The existing hopper that is currently in this location will be removed. The Fuel Reception Units will facilitate the unloading of HGV's delivering fuel chip to site in walking floor trailers. The HGV's will reverse the trailers into position and evacuate the walking floor trailer into the reception unit that gathers and conveys the material onwards. The units are covered to minimise any potential dust emissions.	ITEM 2.1R	Fuel Reception Units altered dimensions to 7.3m x 4.9m x 5.8mH Difference in dimensions: +0.3m x -0.1m x +0.3mH	Proposed Area: 35.77m ² Area difference: slight increase in area of +0.77m ² Relocated to location of 7.5m northeast of permitted Fuel reception unit.
ITEM 2.2	Fuel infeed hopper 3.0m x 6.2m x 5 m H Area = 18.6m ²	The Fuel infeed Hopper will facilitate the introduction of fuel wood chipped onsite into the fuel storage system by means of a front-end loader.	ITEM 2.2R	Fuel infeed hopper altered dimensions to 2.3m x 3.7m x 8.2mH Difference in dimensions: -0.7m x -2.5m x +3.2mH	Proposed Area: 8.5m ² Area difference: reduction in area of -10.1m ² Realigned to match process/operational requirements and relocated to more suitable location of



No.	Permitted Item	Description	No. (R)	Proposed Alteration Dimensions	Summary of Alterations
					35.13m east of permitted Fuel infeed hopper
ITEM 2.3	Walking Floor Infeed System 24m x 18.6m x 5.0m H Area = 202.3 ¹¹ 446.4m ²	The Walking Floor infeed system facilitates the introduction, buffer storage, and mixing of production residue fuels into the fuel storage and conveying system by means of a front-end loader.	ITEM 2.3R	Walking Floor Infeed System altered dimensions to 27.3m x 12.2m x 6.8mH Difference in dimensions: +3.3m x -6.4m x +1.8mH	Proposed Area: 333.0m ² Area difference: reduction in area of -113.34m ² Realigned and sized to match process/operational requirements. Relocated to more suitable location 15.7m north of permitted walking floor infeed system.
ITEM 2.4	Conveying Systems #1 (Into Storage Building) Approx 200m length of conveying Height Varies from ground to max of 20.8m, refer to drawings. Conveying System #1 Area = 520m ²	The conveying systems will consist of both belt and chain conveyors (all covered to minimise dust emissions) to transport fuel from the Fuel Infeed Hopper (Item 2.3) and from the Walking Floor Infeed System into the Fuel Storage Building (Item 1.19).	ITEM 2.4R	Conveying Systems #1 (Into Storage Building) Consists of 3 lengths of conveyors of approx. length of 16.2m, 56.8m and 106.9m respectively = 179.9m length of conveying Difference in dimensions: reduced by -20.1m in length Layout streamlined to match process/operational requirements	Proposed Area: 207.4m ² Area difference: due to shorter length and reconfigure of conveyor; the area of the conveyors is reduced from 520m ² to 207.4m ² = Reduction in area of 312.6m ²
ITEM 2.5	Conveying Systems #2 (from Storage Building to energy Systems) Line 1 Energy Plant	The conveying systems will consist of both belt and chain conveyors (all covered to minimise dust emissions) to transport fuel between from the fuel storage building (item 1.19) to the	ITEM 2.5R	Conveying Systems #2 (from Storage Building to energy Systems) to ITEM 2.5 to Line 1 Energy Plant	Proposed Area: 165.0m ² Area difference: due to utilising existing of conveyor;

¹¹ Strikethrough = Error in original calculation



No.	Permitted Item	Description	No. (R)	Proposed Alteration Dimensions	Summary of Alterations
	Approx 266m length of conveying Height Varies from ground to max of 22.5m, refer to drawings. Conveying System #2 Area = 245* ¹² 295.9m ²	respective energy systems. This will include an existing conveyor that will be relocated.		Reduced to approx. 170m length of conveying Height Varies from ground to max of 23.2m Difference in dimensions: length reduced by -96m due to utilising existing conveyors and slight increase of +0.7m in height	the area of the conveyors is reduced from 295.9m² to 165.0m² = Reduction in area of -130.9m² Conveyor alignment altered from refiner building to energy plant
ITEM 2.6	Line 2 Energy Plant Approx 44m length of conveying Height Varies from ground to max of 20.9m, refer to drawings. Conveying System #2 Area = 77.5m ²	The conveying systems will consist of both belt and chain conveyors (all covered to minimise dust emissions) to transport fuel between from the fuel storage building (item 1.19) to the respective energy systems. This will include an existing conveyor that will be relocated.	ITEM 2.6R	Line 2 Energy Plant Approx 10m length of conveying Height Varies from ground to max of 11.0m Conveying System #2 Difference in dimensions: reduction of -33.0m in length and -9.9m in height	Proposed Area: 11.0m² Area difference: the area will be reduced by -66.5m² Conveying Systems #2 (from Storage Building to energy Systems) re-configured and utilise existing conveyors.
ITEM 2.7	Pneumatic (Dry Fuel) Systems Pneumatic Transport Ducts #1 Length = 161.5m x Ø150mm pipe #2 Length = 202.9m x Ø150mm pipe	The existing pneumatic conveying systems, including blowers, fans & filters to capture & transport production residues will undergo some alterations and additions to facilitate the proposed development. The existing Line 2 Sander Dust & Saw Dust pneumatic extraction systems will be modified to provide separate systems	ITEM 2.7R	Pneumatic (Dry Fuel) Systems Item 2.7 Pneumatic Transport Ducts #1 Length = 161.5m x Ø150mm pipe	

¹² Strikethrough = Error in original calculation



No.	Permitted Item	Description	No. (R)	Proposed Alteration Dimensions	Summary of Alterations
	Total length = 364.4m	<p>for sander dust and saw dust. This will incorporate additional pneumatic conveying plant and infrastructure to transport the saw dust to the existing sander dust silos. A new Sander Dust Silo Ø=6.0M x H=16M & associated filter plant (Item 3.7) will be located in Development Area 2, adjacent to the proposed Line 1 Energy System. The Sander Dust Silo will receive pneumatically conveyed fuel dust from the existing on sander dust silos and will discharge material into the Line 1 Energy Plant as fuel.</p> <p>The existing Line 1 Saw Dust pneumatic extraction system will be modified to send the saw dust to either (by means of a divert gate) the proposed Edge Trim Silo (see above) Or the proposed Sander Dust Silo (also see above).</p> <p>The existing Line 1 Sander Dust Silos (2No.) discharges will be modified to deliver sander dust to the new Sander dust silo proposed adjacent to the proposed Line 1 Energy System. The Ø150mm pipe that currently connects the existing Line 1 Sander Dust Silos to the existing Line 1 Energy System will be redirected to the proposed new sander dust silo.</p>		<p>#2 Length = 257.2 m x Ø150mm pipe</p> <p>Difference in dimensions: #2 Length has increased by +54.3m to align with Item 3.8R Line 1 Thermal Fluid Pipping</p>	<p>Proposed Length: 418.7m</p> <p>Length difference: an increase of +54.3m</p>
		The existing Edge Trim System will be modified by dismantling and removing the existing Edge Trim Silo and associated filter plant (Item 1.26) (Air			Proposed Area: 51.8 m²



No.	Permitted Item	Description	No. (R)	Proposed Alteration Dimensions	Summary of Alterations
ITEM 2.8	Edge Trim Silo Ø=5.6m x H= 19.5m Area = 6.2m x 6.2m = 38.4m ²	Emission A2-20) and constructing a new Edge Trim Silo Ø=5.6m x H= 19.5m, (Item 2.8) and associated filter plant adjacent to the fuel storage building. The Ø150mm pipe that currently connects the production process to the existing Edge Trim Silo will be redirected to the new Edge Trim Silo (Item 2.7). The discharge system within the new Edge Trim Silo will deposit the material into the fuel storage system conveyors. The alterations will include the pneumatic conveying plant and infrastructure to transport the edge trim to the new silo and the silo discharge system to deposit the material into the fuel storage system conveyors.	ITEM 2.8R	Edge Trim Silo Ø= 7.2m x H= 19.5m Difference in dimensions: +0.4m x 0mH	Area difference: an increase of +13.4m² Relocated to more suitable location of 37.3m east of permitted Item 2.8 Edge Trim Silo

3.2.1.1 Development Area 2

The proposed Alterations of Development Area 2 are detailed in Table 3, which provides a breakdown of the detailed description of each item. Table 3 is to read in conjunction with the drawings PL08B Rev1, PL14 R1, and PL16R1 enclosed with this request.

Table 3: Development Area 2 Proposed Alteration Details

No.	Permitted Item	Description	No. (R)	Proposed Alteration Dimensions	Summary of Alterations
ITEM 3.1	Line 1 Wet Fuel Metering Bin	The wet fuel (bark or chips) is received by the Wet Fuel Metering Bin from the conveying systems referred to in Development Area 1.	ITEM 3.1R	Line 1 Wet Fuel Metering Bin 28.8m 7.4m x 10.3mH	Proposed Area: 213.1m²



No.	Permitted Item	Description	No. (R)	Proposed Alteration Dimensions	Summary of Alterations
	(18.6m x 15.7m x 4.5mH) Area = 254.5 ¹³ 292.0m ²			Difference in dimensions: +10.2m x -8.3m x +5.8m H	Area difference: a reduction of -78.9m ² Resized & relocated to match operational requirements. Height increase: +5.8m giving a total height of 10.3m.
ITEM 3.2	Line 1 Energy System Fuel Feed Conveyor (33.2m L x 1.1m W conveyor Max Height 17.8m Area = 38.0m ²	The Wet Fuel will be discharged from the Wet Fuel Metering Bin to a Line 1 Wet Fuel Metering Bin Outfeed Weight Belt and a Line 1 Energy System Fuel Feed Conveyor to the Grate Furnace Combustion Chamber with the energy plant.	ITEM 3.2R	Line 1 Energy System Fuel Feed Conveyor 31.4m L x 1.0m W conveyor Max Height 20.7m Difference in dimensions: -1.8m L x -0.1m x +2.9m H	Proposed Area: 31.4m ² Area difference: a slight reduction of -6.6m ² Adjusted to accommodate metering bin and energy plant
ITEM 3.3	Line 1 Energy Plant 32.5m x 21.6m x 33m Area = 442m ²¹⁴ 702m ²	The energy plant will consist of a wood biomass fired Thermal Fluid Heater (TFH). Inside the TFH, the Wet Fuel will combust together with fresh air provided by the Primary Fan and Secondary Fan inside the Combustion Chamber to produce hot flue gas. An emergency stack on the TFH with a damper will automatically open upon upset conditions. The hot flue gas will supply heat to a thermal fluid that is piped through the	ITEM 3.3R	Line 1 Energy Plant 28.2m x 21.0m x 33mH: Stack Height Difference in dimensions: -4.3m x -0.6m x 0mH	Proposed Area: 592.2m ² Area difference: a reduction of -109.8m ² Reduced size & minor re-location. Moved by 11.8m west to accommodate equipment. This is not a continuous emission point.

¹³ Strikethrough = Error in original calculation

¹⁴ Strikethrough = Error in original calculation



No.	Permitted Item	Description	No. (R)	Proposed Alteration Dimensions	Summary of Alterations
		energy plant, which in turn provides heat to the Line 1 press and a Steam Generator). There are no changes associated with the regulated release points (Core Dryer A2-5 and Face Dryer A2-6).			
ITEM 3.4	Line 1 Dry Electrostatic Precipitator (within the TFH dims of 27.6m x 13.7m x 23.3mH) Area = 286.9 m ²	The Fly Ash inside the Hot Gas will be cleaned and captured by a Dry Electrostatic Precipitator (Dry ESP) and discharged through the SSC Rotary Airlock onto the Wet Ash Conveyor. The Bottom Ash will be discharged through the holes on the grate and recovered by the Wet Ash Conveyor to the Ash Storage Bunker for disposal.	ITEM 3.4R	Line 1 Dry Electrostatic Precipitator (within the TFH dims of 24.5m x 11.1m x 23.3.0mH Difference in dimensions: -3.1m x -2.6m x 0mH	Proposed Area: 271.9m ² Area difference: a slight reduction of -15.0m ² Resized & Location moved to accommodate equipment
ITEM 3.5	Line 1 Hot Gas Duct 105m long x Ø3.2m Area = 336.0m ²	The Hot Gas will be transported to the Line 1 Dryer Systems (Core and Face dryers) via the Hot Gas Duct where it will be mixed with ambient air for the purpose of drying the wet wood fibre. The existing mixing chambers located within the Line 1 Dryer Building will be modified to accommodate the new hot gas duct.	ITEM 3.5R	Line 1 Hot Gas Duct 98.1m long x Ø2.6m Difference in dimensions: -6.9m x Ø-0.6m	Proposed Area: 255.0m ² Area difference: a reduction of -81.0m ²
ITEM 3.6	Line 1 Start Up Stack (30.2mH x Ø3.6m) Area = 10.8m ²	The Hot Gas duct will contain an abort gate & Start-up Stack. This Abort Gate and start-up stack serves as a by-pass of the Hot Gas Flow to the dryer to atmosphere in case the dryer system is in upset conditions or during plant start-up.	ITEM 3.6R	Line 1 Start Up Stack 30.2mH x Ø2.7m Difference in dimensions: 0mH x -0.9m	Proposed Area: 9.0m ² Area difference: a slight reduction of -1.8m ² Moved due to constructability constraints 30.2 m height is maintained and relocated by 10.3m east. This change will not affect the assumptions in



No.	Permitted Item	Description	No. (R)	Proposed Alteration Dimensions	Summary of Alterations
					the EIAR as it is not a continuous emission point.
ITEM 3.7	Line 1 Sander Dust Silo (Ø 6.0m x 16mH) Area = 28.3m ²	As referenced in 'Pneumatic (Dry Fuel) Systems' in Development Area 1, the existing extraction systems are to be modified and will a proposed Sander Dust Silo Ø 6.0m x 16mH and associated filter plant, located adjacent to the proposed Line 1 Energy Plant. The Sander Dust Silo will discharge material into the Line 1 Energy Plant as fuel.	ITEM 3.7R	Line 1 Sander Dust Silo (Ø 3.0m x 13.3mH) Difference in dimensions: 0m	Proposed Area: 9.0m² Area difference: reduction of -19.3m ² Incorporated into the frame structure of the to the energy plant
ITEM 3.8	Line 1 Thermal Fluid Piping 217m L x Ø 0.6m x 16.3mH Area = 40.9 130.2 m ²	The Thermal Fluid Piping will transport the heated thermal fluid to and from the energy plant and both the existing Line 1 Press and a new steam generator.	ITEM 3.8R	Line 1 Thermal Fluid Piping 107.1m L x Ø 0.3m x 10.3mH Difference in dimensions: -109.9m x Ø-0.3m	Proposed Area: 32.1 m ² Area difference: a reduction of -98.1 m ²
ITEM 3.9	Line 1 Steam Generator 14.4m x 3.5m x 17.9mH Area = 47.5m ²	The Steam generator will use heated thermal fluid to generate steam for the various existing steam users on Line 1. The new steam piping will connect the steam generator to the existing steam pipe infrastructure.	ITEM 3.9R	Line 1 Steam Generator 13.5m x 4.4m x 10.8mH Difference in dimensions: -0.9m x +0.9m x -7.1mH Reduction of external works as re-located inside existing building.	Proposed Area: 59.4m ² Area difference: an increase of +11.9m ² Reduction in height of pipe work
ITEM 3.10	Line 1 Dryer System 34.0m x 17.5m x 13.9mH Area = 505.7m ²	The Hot Gas generated by the new Line 1 Energy plant will be utilised in the dryer system to dry wood fibre to produce MDF.	ITEM 3.10	Line 1 Dryer System 34.0m x 17.5m x 13.9mH Area = 505.7m ² As permitted; Inside existing building	No Area Difference



No.	Permitted Item	Description	No. (R)	Proposed Alteration Dimensions	Summary of Alterations
ITEM 3.11	Line 1 Bunded Oil Storage 10.4m x 6.4m x 3.1mH Area = 66.5m ²	Bunded Oil Storage Tank	ITEM 3.11R	Line 1 Bunded Oil Storage 10.5m x 6.9m x 3.9mH Difference in dimensions: +0.1m x +0.5m x +0.8mH	Proposed Area: 72.5m ² Area difference: an increase of +6.0m ²

There are no proposed design alterations to the Permitted Development in Area 3.



3.2.2 Construction and Operational Activities

There will be no changes in the construction activities required to implement the proposed alterations when compared to the existing permitted development. The potential for likely significant effects on European sites from the construction activities have been previously assessed and mitigated for in the Natura Impact Statement prepared by SLR (2024) for the original ABP Ref. PA92.319013 application.

There will be no changes in the operational activities as a result for the proposed alterations to the existing permitted development.

3.3 Step Two, Part 2: Potential Impact Factors

As previously assessed under ABP Ref. PA92.319013, the permitted development has the potential to result in the following effects:

- Air emissions resulting in pollution of sensitive habitats and threats to the life cycle of sensitive species.
- Dust emissions resulting in increased sediment loads in sensitive habitats and habitats supporting sensitive species.
- Changes in water quality due to water discharge into the River Anner.
- Changes in water quality due to deposition of emissions to air within the catchment.
- Possible changes in water quantity due to abstraction from the River Anner.

The habitats and species listed as features of interest of any European sites in proximity to the project must therefore be assessed for affects from potential impact factors listed above, and these effects are considered further below.

3.4 Step Three: Identification of Relevant European sites

The first step in identification of relevant European sites for further assessment is to identify those that will be at risk from likely significant effects where a Source-Pathway-Receptor (S-P-R) link exists between the proposed development and the European site.

The relevant European sites are identified through a review of the nature and scale of the project, the project location relative to European sites, presence of ecological (including mobile and migratory species) and landscape connectivity, such as along waterways, hedgerows and treelines between the Site and the European sites, known impacts and effects likely to arise as a result of this type of project, distance from European sites and the qualifying interests of the European sites.

Table 4 below provides a list of European sites and the Source-Pathway-Receptor links that exists between them and the Project Site. These sites were identified using the EPA tool to identify European sites that could be within the zone of influence by considering hydrological or ecological connections which will be assessed as part of the screening process. **Table 5** provides a description of each site, the QIs and their specific conservation objectives, the potential impacts through the identified source-pathway-receptor links (labelled from the below list) and whether the QIs are screened in for further assessment or not.



Table 4: European Sites with potential Source-Pathway-Receptor links

European Site	Site Code	Location at Closest Point to Project Site ¹⁵
Lower River Suir SAC	002137	60m west
Nier Valley Woodlands SAC	000688	9.1km south
Comeragh Mountains SAC	001952	9.9km south
River Barrow and River Nore SAC	002162	44.3km south-east

¹⁵ When measured in a straight line over the shortest distance between the Site and the Natura 2000 site.



Table 5: Description of European sites with Potential Source-Pathway-Receptor Links

European Site	Qualifying Interests	Conservation objectives	Source-Pathway-Receptor
Lower River Suir SAC [002137]	<ul style="list-style-type: none"> Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) [1330] Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410] Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation [3260] Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels [6430] Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0] Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>) [91E0] <i>Taxus baccata</i> woods of the British Isles [91J0] <i>Margaritifera margaritifera</i> (Freshwater Pearl Mussel) [1029] <i>Austropotamobius pallipes</i> (White-clawed Crayfish) [1092] <i>Petromyzon marinus</i> (Sea Lamprey) [1095] <i>Lampetra planeri</i> (Brook Lamprey) [1096] <i>Lampetra fluviatilis</i> (River Lamprey) [1099] <i>Alosa fallax fallax</i> (Twait Shad) [1103] <i>Salmo salar</i> (Salmon) [1106] 	<p>To maintain or restore the favourable conservation condition of the habitats and species listed as qualifying interests for Lower River Suir SAC, which is defined by a specific list of attributes and targets.</p> <p>Detailed conservation objectives can be accessed at:</p> <p>ConservationObjectives.rdl (npws.ie)</p>	<p><u>Air emissions (NOx) from the plant</u> - the proposed design alterations to existing permitted development will not result in any change in air emissions (NOx) and therefore there will be no likely significant effects on any of the habitats or species listed for the SAC.</p> <p><u>Dust emissions from the plant</u> - the proposed design alterations to existing permitted development will not result in any change in dust emissions and therefore there will be no likely significant effects on any of the habitats or species listed for the SAC.</p> <p><u>Surface water discharge into the River Anner</u> - the proposed design alterations to existing permitted development will not result in any change in surface water discharge and therefore there will be no likely significant effects on any of the habitats or species listed for the SAC</p> <p><u>Changes in water quality due to deposition of emissions to air</u> - the proposed design alterations to existing permitted development will not result in any change in water quality from deposition of air emissions and therefore there will be no likely significant effects on any of the habitats or species listed for the SAC.</p> <p><u>Possible changes in water quantity due to abstraction from the River Anner</u> - the proposed design alterations to existing permitted development will not result in any change in water quantity due to abstraction from the River Anner and therefore there will be no likely significant effects on any of the habitats or species listed for the SAC.</p> <p>Lower River Suir SAC - SCREENED OUT</p>



European Site	Qualifying Interests	Conservation objectives	Source-Pathway-Receptor
	<ul style="list-style-type: none"> <i>Lutra lutra</i> (Otter) [1355] 		
Nier Valley Woodlands SAC 000688	<ul style="list-style-type: none"> Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0] 	<p>To restore the favourable conservation condition of the habitat listed as a qualifying interest for Nier Valley Woodlands SAC, which is defined by a specific list of attributes and targets that can be found at:</p> <p>ConservationObjectives.rdl (npws.ie)</p>	<p><u>Air emissions (NOx) from the plant</u> - the proposed design alterations to existing permitted development will not result in any change in air emissions (NOx) and therefore there will be no likely significant effects on any of the habitats or species listed for the SAC.</p> <p><u>Dust emissions from the plant</u> - the proposed design alterations to existing permitted development will not result in any change in dust emissions and therefore there will be no likely significant effects on any of the habitats or species listed for the SAC.</p> <p><u>Surface water discharge into the River Anner</u> - the proposed design alterations to existing permitted development will not result in any change in surface water discharge and therefore there will be no likely significant effects on any of the habitats or species listed for the SAC</p> <p><u>Changes in water quality due to deposition of emissions to air</u> - the proposed design alterations to existing permitted development will not result in any change in water quality from deposition of air emissions and therefore there will be no likely significant effects on any of the habitats or species listed for the SAC.</p> <p><u>Possible changes in water quantity due to abstraction from the River Anner</u> - the proposed design alterations to existing permitted development will not result in any change in water quantity due to abstraction from the River Anner and therefore there will be no likely significant effects on any of the habitats or species listed for the SAC.</p> <p>Nier Valley Woodlands SAC - SCREENED OUT</p>



European Site	Qualifying Interests	Conservation objectives	Source-Pathway-Receptor
Comeragh Mountains SAC 001952	<ul style="list-style-type: none"> Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) [3110] Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation [3260] Northern Atlantic wet heaths with Erica tetralix [4010] European dry heaths [4030] Alpine and Boreal heaths [4060] Blanket bogs (* if active bog) [7130] Siliceous scree of the montane to snow levels (Androsacetalia alpinae and Galeopsietalia ladani) [8110] Calcareous rocky slopes with chasmophytic vegetation [8210] Siliceous rocky slopes with chasmophytic vegetation [8220] Hamatocaulis vernicosus (Slender Green Feather-moss) [6216] 	<p>To maintain or restore the favourable conservation condition of the habitats and or species listed as qualifying interests for Comeragh Mountains SAC has been selected, which is defined by a specific list of attributes and targets that can be found at:</p> <p>CO001952.pdf (npws.ie)</p>	<p><u>Air emissions (NOx) from the plant</u> - the proposed design alterations to existing permitted development will not result in any change in air emissions (NOx) and therefore there will be no likely significant effects on any of the habitats or species listed for the SAC.</p> <p><u>Dust emissions from the plant</u> - the proposed design alterations to existing permitted development will not result in any change in dust emissions and therefore there will be no likely significant effects on any of the habitats or species listed for the SAC.</p> <p><u>Surface water discharge into the River Anner</u> - the proposed design alterations to existing permitted development will not result in any change in surface water discharge and therefore there will be no likely significant effects on any of the habitats or species listed for the SAC</p> <p><u>Changes in water quality due to deposition of emissions to air</u> - the proposed design alterations to existing permitted development will not result in any change in water quality from deposition of air emissions and therefore there will be no likely significant effects on any of the habitats or species listed for the SAC.</p> <p><u>Possible changes in water quantity due to abstraction from the River Anner</u> - the proposed design alterations to existing permitted development will not result in any change in water quantity due to abstraction from the River Anner and therefore there will be no likely significant effects on any of the habitats or species listed for the SAC.</p> <p>Comeragh Mountains SAC - SCREENED OUT</p>



European Site	Qualifying Interests	Conservation objectives	Source-Pathway-Receptor
River Barrow and River Nore SAC 002162	<ul style="list-style-type: none"> • <i>Estuaries</i> [1130] • <i>Mudflats and sandflats not covered by seawater at low tide</i> [1140] • <i>Reefs</i> [1170] • <i>Salicornia and other annuals colonising mud and sand</i> [1310] • <i>Atlantic salt meadows (Glaucopuccinellietalia maritimae)</i> [1330] • <i>Mediterranean salt meadows (Juncetalia maritimi)</i> [1410] • <i>Water courses of plain to montane levels with the Ranunculus fluitantis and Callitriche-Batrachion vegetation</i> [3260] • <i>European dry heaths</i> [4030] • <i>Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels</i> [6430] • <i>Petrifying springs with tufa formation (Cratoneurion)</i> [7220] • <i>Old sessile oak woods with Ilex and Blechnum in the British Isles</i> [91A0] • <i>Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)</i> [91E0] • <i>Vertigo moulinsiana (Desmoulin's Whorl Snail)</i> [1016] • <i>Margaritifera margaritifera (Freshwater Pearl Mussel)</i> [1029] • <i>Austropotamobius pallipes (White-clawed Crayfish)</i> [1092] 	<p>To maintain or restore the favourable conservation condition of the habitats and or species listed as qualifying interests for Comeragh Mountains SAC has been selected, which is defined by a specific list of attributes and targets that can be found at:</p> <p>Site specific cons obj (npws.ie)</p>	<p><u>Air emissions (NOx) from the plant</u> - the proposed design alterations to existing permitted development will not result in any change in air emissions (NOx) and therefore there will be no likely significant effects on any of the habitats or species listed for the SAC.</p> <p><u>Dust emissions from the plant</u> - the proposed design alterations to existing permitted development will not result in any change in dust emissions and therefore there will be no likely significant effects on any of the habitats or species listed for the SAC.</p> <p><u>Surface water discharge into the River Anner</u> - the proposed design alterations to existing permitted development will not result in any change in surface water discharge and therefore there will be no likely significant effects on any of the habitats or species listed for the SAC</p> <p><u>Changes in water quality due to deposition of emissions to air</u> - the proposed design alterations to existing permitted development will not result in any change in water quality from deposition of air emissions and therefore there will be no likely significant effects on any of the habitats or species listed for the SAC.</p> <p><u>Possible changes in water quantity due to abstraction from the River Anner</u> - the proposed design alterations to existing permitted development will not result in any change in water quantity due to abstraction from the River Anner and therefore there will be no likely significant effects on any of the habitats or species listed for the SAC.</p> <p>River Barrow and River Nore SAC – SCREENED OUT</p>



European Site	Qualifying Interests	Conservation objectives	Source-Pathway-Receptor
	<ul style="list-style-type: none"> • <i>Petromyzon marinus</i> (Sea Lamprey) [1095] • <i>Lampetra planeri</i> (Brook Lamprey) [1096] • <i>Lampetra fluviatilis</i> (River Lamprey) [1099] • <i>Alosa fallax fallax</i> (Twaite Shad) [1103] • <i>Salmo salar</i> (Salmon) [1106] • <i>Lutra lutra</i> (Otter) [1355] • <i>Trichomanes speciosum</i> (Killarney Fern) [1421] • <i>Margaritifera durrovensis</i> (Nore Pearl Mussel) [1990] 		



3.5 Step Four: Likely Significant Effects

3.5.1 For the Project Alone

The possible effects of the project alone were identified as air and dust emissions resulting in pollution of sensitive habitats and sensitive species, and potential changes in water quality in the River Anner.

In Error! Reference source not found.5 it is shown that while there are air and hydrological source-pathway-receptor links between the between the project site and Lower River Suir SAC and the River Barrow and River Nore SAC, small-scale nature of the proposed alterations to existing permitted development means that there is no impacts and therefore no risk of likely significant effects on the qualifying interests of any European Site.

Therefore, the risk of significant effects on European sites as a result of the proposed design alterations to the existing permitted development can be excluded for the project alone.

3.5.2 For the Project in Combination

In combination, or cumulative, effects can result from individually insignificant but collectively significant actions taking place over a period of time or concentrated in a location. Cumulative effects can occur where a proposed development results in individually insignificant impacts that, when considered in-combination with impacts of other proposed or permitted plans and projects, can result in significant effects.

Other plans and projects that should be considered when establishing cumulative effects are:

- proposals for which consent has been applied but which are awaiting determination;
- projects which have been granted consent, but which have not yet been started or which have been started but are not yet completed (i.e., under construction);
- proposals which have been refused permission, but which are subject to appeal, and the appeal is undetermined;
- constructed developments whose full environmental effects are not yet felt and therefore cannot be accounted for in the baseline; or
- developments specifically referenced in a National Policy Statement, a National Plan or a Local Plan.

A search of recent (within the last five years) planning applications in the vicinity of the Site was carried out for applications that may give rise to in combination effects with the project. There are no potential pathways for the recent planning applications in the vicinity of the Site to result in in-combination effects with the proposed development. The recent planning applications considered for in-combination effects are listed in Table 6.

All other planning applications in the vicinity of the Site are either small-scale, private developments or more than five years old.

There are no plans or policies in the Tipperary Development Plan 2022-2028 which would result in LSE in combination with the proposed development.

Therefore, the risk of significant effects on European sites as a result of the proposed design alterations to the existing permitted development can also be excluded for the project when considered in-combination with other proposed or permitted plans and projects.



Table 6: Recent Planning Applications Considered for 'In Combination' Effects

Planning Ref.	Date	Distance to Development	Details	In-Combination LSE
201256	December 2020	Within industrial site	The development of the retention of 1) First Aid Room (55.7m ²), 2) Warehouse (1212.28m ²), 3) LPG Storage Tank & Pump Shed (20m ²), 4) Overburden Storage Area (3370m ²), 5) Log Storage Area (2.98 Ha), 6) Fuel (Wood Chips) Storage Shed (758m ²), 7) Diesel Stores (44.3m ²), 8) Contract Cabin (22.2m ²), 9) Compressor Room (151.2m ²), 10) Stores Building (89.2m ²) & Fenced Storage area (44.2m ²), 11) Oil Stores (84.6m ²), 12) Maintenance Vehicle Area (22m ²), 13) Bike Shed (20.45m ²), 14) Weighbridge (80m ²), 15) 6 no. Storage Containers (81 m ² = 6.5 m ² x 1 & 14.9 m ² x 5), 16) Boundary Fencing (530m Long, 2m high), 17) Recycle Chip Storage Bay (300m ²) within an application area of 7.0 hectares	AA Screening report provided. No potential to impact any European Site
211240	October 2021	Within industrial site	Construction of 1.8km of boundary fencing, including access gates and associated works.	Decision concluded that the project will have no adverse impact upon the character of the area or the amenities of adjoining properties.
22228	May 2022	Within industrial site	to replace an existing electrical building	AA Screening report provided. No potential to impact any European Site
2360806	2023	Within industrial site	Full Permission for 1) an extension to existing warehouse consisting of warehouse storage use with open canopy to the North facing elevation with internal roadway around the new extension and carparking area and boundary fencing, 2) a machine store/lift store with electrical charging points, 3) retention permission for an open canopy constructed to the rear of the premises with all associated siteworks at Twomilebridge, Clonmel.	AA Screening report provided. No potential to impact any European Site
S5/25/74	June 2025	Within industrial site	Section 5 Declaration for Development of a 1,000m ³ Wastewater Storage Tank at Medite's MDF Manufacturing Facility.	AA Screening report provided. No potential to impact any European Site



4.0 Conclusions and Recommendations

This AA Screening Report, based on the best available scientific information, shows that there are no source-pathway-receptor links between the proposed alterations to the existing permitted development and any European site which would undermine the conservation objectives for the Qualifying/Special Conservation Interests of the European sites listed in **Table 4** and assessed in **Table 5**. Therefore, likely significant effects on European sites as a result of the proposed alterations to the existing permitted development, under PA92.319013, can be excluded for the project alone and in combination with other proposed or permitted plans and projects.

We therefore submit that the competent authority, in this case An Coimisiún Pleanála, can determine beyond reasonable scientific doubt that an Appropriate Assessment is not required, as the proposed alterations to the existing permitted development, individually or in combination with other plans or projects, will not have a significant effect on any European site.



5.0 References

DoEHLG (2010) Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities. National Parks and Wildlife Service, Department of the Environment, Heritage and Local Government. Dublin.

European Commission (2018) Managing Natura 2000 Sites: The Provisions of Article 6 of the 'Habitats Directive' 92/43/EEC.

European Commission (2021) Assessment of Plans and Projects in relation to Natura 2000 sites – Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC.

European Union Habitats Directive, (1992) Council Directives 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

Government and Heritage. Scott Wilson and Levett-Therivel, (2006) Appropriate Assessment of Plans. Scott Wilson, Levett-Therivel Sustainability Consultants, Treweek Environmental Consultants and Land Use Consultants.

NPWS (2011) *Conservation Objectives for River Barrow and River Nore SAC 002162*. National Parks & Wildlife Service, Department of the Environment, Heritage & Local Government, Dublin.

NPWS (2017) *Conservation Objectives for Lower River Suir SAC 002137*. National Parks & Wildlife Service, Department of the Environment, Heritage & Local Government, Dublin.

NPWS (2021) *Conservation Objectives for Nier Valley Woodlands SAC 000668*. National Parks & Wildlife Service, Department of the Environment, Heritage & Local Government, Dublin.

NPWS (2021) *Conservation Objectives: Comeragh Mountains SAC 001952*. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.





Appendix A Relevant Legislation and Policy

Appropriate Assessment Screening Report

Medite DAC Europe

Redmondstown, Clonmel. County Tipperary

SLR Project No.: 501.065802.00001

12th August 2025



A.1 Relevant Legislation and Policy

A.1.1 Habitats and Birds Directives

The Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora) forms the basis for the designation of Special Areas of Conservation (SACs) and a precursor designation Sites of Community Interest (SCI). Similarly, Special Protection Areas (SPAs) are classified under the Birds Directive (Council Directive 2009/147/EEC on the Conservation of Wild Birds). Collectively, SACs, SCIs and SPAs are referred to as the Natura 2000 network. The Natura 2000 Network is the minimum required to conserve certain habitats and species which are listed in the Directives.

Under Article 6(3) of the Habitats Directive, an Appropriate Assessment (AA) must be undertaken for any plan or project that is not directly connected with or necessary to the management of a Natura 2000 site but is likely to have a significant effect thereon, either alone or in combination with other plans or projects. An AA is an evaluation of the adverse effects of a plan or project, alone or in combination with other plans or projects, on the integrity of a Natura 2000 site, and the identification, where necessary, of avoidance or mitigation measures to preclude adverse effects on the integrity of the site.

Article 6, paragraph 3 the Habitats Directive states that:-

“Any plan or project not directly connected with or necessary to the management of the [Natura 2000] 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 [Natura 2000] 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”.

Article 6, paragraph 4 goes on to deal with the special circumstances for the granting of consent for plans and projects which would have an adverse effect the integrity of the site(s) concerned.

A.1.2 European Communities (Birds and Natural Habitats) Regulations 2011

Pursuant to the Habitats Directive, Part 5 of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended, similarly sets out the requirements for screening assessments, the circumstances under which an AA is required and the further implementation of Article 6(3) and 6(4) of the Habitats Directive.

It defines a “European Site” as (a) a candidate site of Community importance, (b) a site of Community importance, (c) a candidate special area of conservation, (d) a special area of conservation, (e) a candidate special protection area, or (f) a special protection area. European sites may therefore include sites which may intended to become part of the Natura 2000 network as well as those already within that network.

Regulation 42 has 22 paragraphs, with selected text provided below.

Regulation 42(1) requires that *‘a screening for Appropriate Assessment of a plan or project for which an application for consent is received, or which a public authority wishes to undertake or adopt, and which is not directly connected with or necessary to the management of the site as a European Site, shall be carried out by the public authority to assess, in view of best scientific knowledge and in view of the conservation objectives of the site, if that plan or project, individually or in combination with other plans or projects is likely to have a significant effect on the European site.’*

Regulation 42(2) expands on this, stipulating that a public authority must carry out a screening for AA before consent for a plan or project is given, or a decision to undertake or adopt a plan or project is taken.

Regulation 42(6) requires that *‘the public authority shall determine that an Appropriate Assessment of a plan or project is required where the plan or project is not directly connected with or necessary to the management of the site as a European Site and if it cannot be excluded, on the basis of objective scientific information following screening under this*



Regulation, that the plan or project, individually or in combination with other plans or projects, will have a significant effect on a European site’.

Regulation 42(3)(a) gives the public authority the power to direct a third party to provide a Natura Impact Statement (NIS) and Regulation 42(3)(b) allows it to request any additional information that it needs to complete the screening assessment or AA. Regulation 42(5) goes on to make clear that the NIS should include such information as the public authority considers necessary to enable it to undertake the AA and to ascertain if a project or plan will affect the integrity of a Natura 2000 site. In addition to the information, Regulation 2(1) provides a definition of a Natura Impact Statement as “*a report comprising the scientific examination of a plan or project and the relevant European Site or European Sites, to identify and characterise any possible implications of the plan or project individually or in combination with other plans or projects in view of the conservation objectives of the site or sites, and any further information including, but not limited to, any plans, maps or drawings, scientific information or data required to enable the carrying out of an Appropriate Assessment*”.

Regulation 42(11) makes clear that the AA must be carried out by the public authority and that it must include its conclusion as to whether the project or plan would adversely affect the integrity of a Natura 2000 site, and that this must be done prior to consenting the project. Regulation 42 (12) makes clear that the competent authority should, *inter alia*, consider the Natura Impact Statement when undertaking the AA.

Regulations 43 and 45 then go on to deal with Article 6(4) of the Habitats Directive.

A.1.3 Planning and Development Act 2000 (as amended)

These processes have been further enshrined in the Planning and Development Act 2000 (as amended), in sections 177T, 177U and 177V.

177T states that:

(1) (a) A Natura impact report means a statement for the purposes of Article 6 of the Habitats Directive, of the implications of a Land use plan, on its own or in combination with other plans or projects, for one or more than one European site, in view of the conservation objectives of the site or sites.

(b) A Natura impact statement means a statement, for the purposes of Article 6 of the Habitats Directive, of the implications of a proposed development, on its own or in combination with other plans or projects, for one or more than one European site, in view of the conservation objectives of the site or sites.

(2) Without prejudice to the generality of subsection (1), a Natura impact report or a Natura impact statement, as the case may be, shall include a report of a scientific examination of evidence and data, carried out by competent persons to identify and classify any implications for one or more than one European site in view of the conservation objectives of the site or sites.

(3)

(4) The applicant for consent for proposed development may, or if directed in accordance with subsection (5) by a competent authority, shall furnish a Natura impact statement to the competent authority in relation to the proposed development.

(5) At any time following an application for consent for proposed development a competent authority may give a notice in writing to the applicant concerned, directing him or her to furnish a Natura impact statement.

(6)

(7) a) a Natura impact report or a Natura impact statement shall include all information prescribed by regulations under section 177AD.



(b) Where appropriate, a Natura impact report or a Natura impact statement shall include such other information or data as the competent authority considers necessary to enable it to ascertain if the draft Land use plan or proposed development will not affect the integrity of the site.

177U states that:

(1) A screening for appropriate assessment of a draft Land use plan or application for consent for proposed development shall be carried out by the competent authority to assess, in view of best scientific knowledge, if that Land use plan or proposed development, individually or in combination with another plan or project is likely to have a significant effect on the European site.

(2)....

(3) in carrying out screening for appropriate assessment of a proposed development a competent authority may request such information from the applicant as it may consider necessary to enable it to carry out that screening....

(4) The competent authority shall determine that an appropriate assessment of a draft Land use plan or a proposed development, as the case may be, is required if it cannot be excluded, on the basis of objective information, that the draft Land use plan or proposed development, individually or in combination with other plans or projects, will have a significant effect on a European site.

(5) [the vice versa of (4)]

(6)

(7)

(8)

(9)

(10)

177V. states that:

(1) An appropriate assessment carried out under this Part shall include a determination by the competent authority under Article 6.3 of the Habitats Directive as to whether or not a draft Land use plan or proposed development would adversely affect the integrity of a European site and an appropriate assessment shall be carried out by the competent authority, in each case where it has made a determination under section 177U(4) that an appropriate assessment is required, before — ...

(a) the draft Land use plan is made including, where appropriate, before a decision on appeal in relation to a draft strategic development zone is made, or

(b) consent is given for the proposed development

(2) In carrying out an appropriate assessment under subsection (1) the competent authority shall take into account each of the following matters:

(a) the Natura impact report or Natura impact statement, as appropriate

(b)....

(3)a competent authority shall make a Land use plan or give consent for proposed development only after having determined that the Land use plan or proposed development shall not adversely affect the integrity of a European site

(4)

(5)



(6)

The Act then goes on to deal with Article 6(4) of the Habitats Directive.

A.1.4 National Planning Framework

National Policy Objective 59 Enhance the conservation status and improve the management of protected areas and protected species by

- Implementing relevant EU Directives to protect Ireland's environment and wildlife;
- Integrating policies and objectives for the protection and restoration of biodiversity in statutory development plans;
- Developing and utilising licensing and consent systems to facilitate sustainable activities within Natura 2000 sites;
- Continued research, survey programmes and monitoring of habitats and species.





Appendix B Appropriate Assessment Process

Appropriate Assessment Screening Report **Section 146B**
Alteration Request (ABP PA92.319013)

Medite DAC Europe

Redmondstown, Clonmel. County Tipperary

SLR Project No.: 501.065802.00001

12th August 2025



A.2 Appropriate Assessment Process

A.2.1 Stage One: AA Screening

The methodology for the screening assessment follows that set out in EC (and other) guidelines and be based on the data, surveys and assessments made for this Project. In summary this will comprise:

Step 1: ascertaining whether the Project is directly connected with or necessary to the management of a European site. Typically, this applies only to a management plan, or parts thereof, which has the purpose of maintaining or restoring the conservation interest of a European site, and which would not have a negative effect on any other European site.

Step 2: identifying the relevant elements of the Project and their likely impacts, which is subdivided into:

Step 2, Part 1: an outline description of the Project, including construction, operation and decommissioning, containing enough information for potential impact pathways to be understood, and the Project site and its surroundings, focussing on the habitats and species that may form part of the qualifying interest of a European site.

Step 2, Part 2: an identification of the aspects of the project which have the potential to affect European sites, either alone or in combination with other Projects and Plans. This may include for example emissions to air and water, noise and increases in recreational activity (Sources).

Step 3: identifying which (if any) European sites may be affected, considering the potential effects of the Project alone or in combination with other plans or projects, which is subdivided into:

Step 3, Part 1: generating an initial list of European sites to be considered in the screening process, which are those which are potentially connected (via a Pathway) to the Project site including (i) any which overlap with the Project site or are close enough to experience increased noise, vibration, light, visible human activity or invasive species; (ii) those that may have downstream connectivity via watercourses or groundwater to the Project site or transport routes; (iii) those that may receive deposition of pollutants as a result of emissions to air from the Project or transport routes; (iv) those which may support migratory or mobile species populations which may also use the Project site or its environs; and (v) those which may receive additional recreational activity once the Project site is inhabited.

Step 3, Part 2: compiling basic information on the European sites identified in Part 1, including a list of qualifying interest features/special conservation interest (the Receptors), their conservation objective if known (maintain or restore), the distance and direction from the Project site (including transport routes) and how it is or is not connected, using the Source-Pathway-Receptor model, to the Project site (including transport routes). Likely significant effects can be immediately excluded for any European sites and any qualifying /special conservation interest features which clearly lack a pathway or were it can be demonstrated there is a very weak pathway, such that any effects would not be appreciable.

Step 4: assessing whether likely significant effects (LSE) on all European sites can be ruled out, in view of their conservation objectives.

Step 4, Part 1: assessing LSE for the project alone, determining whether there is a risk that the project could undermine the conservation objectives for the qualifying interest features/special conservation interest for those European sites for which a pathway has been identified. This is a scientific determination which considers whether the maintain or restore objective applies and both direct and indirect effects. If there is any uncertainty or detailed investigation or mitigation are required, LSE are assumed.

Step 4, Part 2: assessing LSE for the project in combination with other Projects and Plans. Along the same lines as Part 1, this considers whether the effects of the Project, if not capable



of undermining the conservation objectives on their own, could do so cumulatively with other projects and plans. It also considers whether the risk of undermining conservation objective is elevated when cumulative effects are considered.

Conclusion: stating whether likely significant effects arising from the Project, alone and in combination with projects and plans, on European sites can be excluded, and if they cannot, which European sites and which qualifying interest features/special conservation interest are at risk from significant effects, and the relevant impact sources and pathways. If the latter, an AA will be required. The conclusion will not consider any mitigation measures designed to avoid likely significant effects on a European site.

A.2.2 Stage Two: Appropriate Assessment

Stage Two is a more detailed assessment, known as an “Appropriate Assessment” due to the terminology in the legislation. This essentially repeats the second test of the screening assessment but in more detail and considering mitigation measures before reaching a conclusion.

At this stage, the test is whether the project or plan will have an adverse effect on the integrity of any European site. This must be done in the light of the conservation objectives for each of the sites and qualifying interest features that have been ‘screened in’ by the earlier stage of assessment. Any effect which could undermine the conservation objectives is considered an adverse effect on the integrity of the site, and vice versa. If the project, with mitigation included, is predicted to lead to adverse effects upon the integrity of the site, further stages of assessment are required before the project can be authorised.

A Stage Two AA is a focused and detailed examination, analysis and evaluation carried out by the competent authority of the implications of the plan or project, alone and in combination with other plans and projects, on the integrity of a European site in view of that site's conservation objectives. Case law has established that such an Appropriate Assessment, to be lawfully conducted, in summary:

(i) must identify, in the light of the best scientific knowledge in the field, all aspects of the proposed development which can, by itself or in combination with other plans or projects, affect the conservation objectives of the European site;

(ii) must contain complete, precise and definitive findings and conclusions and may not have lacunae or gaps; and

(iii) may only include a determination that the proposed development will not adversely affect the integrity of any relevant European site where the competent authority decides (on the basis of complete, precise and definitive findings and conclusions) that no reasonable scientific doubt remains as to the absence of the identified potential effects. If adverse impacts can be satisfactorily avoided or successfully mitigated at this stage, so that no reasonable doubt remains as to the absence of the identified potential effects, then the process is complete. If the assessment is negative, i.e. adverse effects on the integrity of a site cannot be excluded, then the process must proceed to stage three and, if necessary, stage four.





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