
ATTACHMENT 8.7

- CONSULTATION CORRESPONDENCE -

ENVIRONMENTAL IMPACT ASSESSMENT REPORT
DAWN MEATS IRELAND, GREENHILLS, BEAUPARC, NAVAN, CO. MEATH

8.7.1 CORRESPONDENCE WITH INLAND FISHERIES IRELAND

Consultation Request Letter to Inland Fisheries Ireland (email dated 2nd March 2017)

From: Andrew Kennedy
Sent: 02 March 2017 14:34
To: Noel McGloin
Cc: Denver Willis
Subject: Dunbia Slane

Noel,

Thank you for returning my call yesterday.

In summary, Dunbia Slane slaughter cattle in their factory in Beauparc.

We semi treat the waste waters and then send them off site to Navan and Ringsend treatment plants for final treatment.

The sludge goes to farmland for land spreading.

This is not viable from an economic or a sustainable viewpoint.

We are planning to develop a full Waste Water Treatment Plant at our Slane site with the final treated water discharged to the river Boyne from a pipeline running from our factory to the Boyne at the area where the Dollardstown river joins the Boyne.

We have agreed terms with the relevant landowners for way leaves through their farms.

The design of the treatment plant and the applications to both the Council and the EPA are now starting.

As an interested stakeholder I would appreciate any input/suggestions from yourselves.

I would also appreciate if you could let me have the names and contact details for any fishing clubs that use the Boyne in this area.

Regards

Andrew Kennedy



Andrew

Managing
Dunbia Ltd

Kennedy

Director

o: Kilbeggan

t: +353 (0)579369005

m: +353 (0)862470169

ip: 39005

e: andrew.kennedy@dunbia.com

ENVIRONMENTAL IMPACT ASSESSMENT REPORT
DAWN MEATS IRELAND, GREENHILLS, BEAUPARC, NAVAN, CO. MEATH

Inland Fisheries Ireland Response (email dated 20th March 2017)

From: Noel McGloin
Sent: 20 March 2017 13:29
To: 'Andrew Kennedy'
Cc: Francis Carolan; Kevin O'Brien
Subject: RE: Dunbia Slane

Dear Andrew

Inland Fisheries Ireland (IFI) is a Statutory Body established on the 1st July 2010. Under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) *the principal function of IFI is the protection, management and conservation of the inland fisheries resource*. Under section 7(3) of the IFI Act it is stated that *without prejudice to subsection (1), IFI shall in the performance of its functions have regard to(g) the requirements of the European Communities (Natural Habitats) Regulations 1997 (S.I. No. 94 of 1997) and the need for the sustainable development of the inland fisheries resource (including the conservation of fish and other species of fauna and flora habitats and the biodiversity of inland water ecosystems),(h) as far as possible, ensure that its activities are carried out so as to protect the national heritage (within the meaning of the Heritage Act 1995).*

The EU Water Framework Directive (2000/60/EC) entered into force in December 2000 requires the protection of the ecological status of river catchments – this encompasses water quality and requires the conservation of habitats for ecological communities. One of the primary objectives of the Directive is to establish a framework which prevents further deterioration and protects and enhances the status of aquatic ecosystems. Protection of aquatic ecosystems requires that river systems be protected on a catchment basis.

Article 5 of the 2009 Surface Water Regulations requires that a public authority, in performance of its functions, shall not undertake those functions in a manner that knowingly causes or allows deterioration in the chemical or ecological status of a body of surface water. Also article 28(2) of the said Regulations states that a surface water body whose status is determined to be less than good shall be restored to at least good status not later than the end of 2015 and any water body of good status should remain at least this status.

This proposed discharge will be flowing to the main channel of the River Boyne. This is currently at *moderate* status and should have been improved to at least *good* status by the end of 2015. The River Boyne contains stocks of Atlantic Salmon, Brown Trout, eels and lamprey. Therefore we would also like an Appropriate Assessment and/or EIS (if relevant) to be carried out in order to ensure that there sufficient information with regard to the potential effects of this application on the aquatic environment .

Of further concern to us is the mechanism of the construction of the pipeline, especially when crossing watercourses. I am attaching a copy of our relevant guidelines for your information.

ENVIRONMENTAL IMPACT ASSESSMENT REPORT
DAWN MEATS IRELAND, GREENHILLS, BEAUPARC, NAVAN, CO. MEATH

On enquiry, the local angling club is Broadboyne Anglers. I will forward you contact details (when accessed) as soon as I can.

Please contact me if further information is required.

Kind regards

Noel

Noel McGloin
Senior Fisheries Environmental Officer
Inland Fisheries Ireland - Dublin

Iascach Intire Eireann
Inland Fisheries Ireland

Telephone: +353 (0) 1 8842688

Email: noel.mcglain@fisheriesireland.ie

Web: www.fisheriesireland.ie

3044 Lake Drive, City West, Dublin 24, IRELAND. **D24 Y265**

Help Protect Ireland's Inland Fisheries

Call **1890 34 74 24** to report illegal fishing, water pollution or invasive species.

ENVIRONMENTAL IMPACT ASSESSMENT REPORT
DAWN MEATS IRELAND, GREENHILLS, BEAUPARC, NAVAN, CO. MEATH

8.7.2 CORRESPONDENCE WITH DEVELOPMENT APPLICATIONS UNIT (DAU)

Consultation Request Letter to DAU (email dated 3rd May 2017)

From: Lorraine Wyse
Sent: 03/05/2017 15:46
To: Manager DAU
Subject: Planning Application Consultation _Natura Impact Statement_ Proposed Development by Dunbia (Slane), at Greenhills, Beauparc, Navan, Co. Meath.

Dear Sir/Madam,

Panther Environmental Solutions Limited have been requested by Dunbia (Slane) to prepare a Natura Impact Statement as required under the Habitats Directive, and in response to Meath County Council, with regards a planning application for an extension to the existing on-site effluent treatment system and proposed treated effluent discharge to the River Boyne at Dollardstown, Co. Meath. The construction phase of the development, as well as cumulative impacts with other developments in the area will also be addressed.

While it is understood that the National Parks and Wildlife Service will be consulted during the planning application process, we would welcome any comments or observations which the Development Applications Unit may have in relation to the proposed development in the preparation of documents for the application.

It is noted that any further comments/observations made during consideration of the planning application, once made, would also be considered as part of relevant assessments.

Dunbia (Slane) is a producer and processor of beef products. This site takes in live cattle and produces sides and quarters for further processing at other Dunbia Group sites or direct sale. Dunbia (Slane) holds an Industrial Emissions (IE) Licence with the Environmental Protection Agency (EPA), Registration No. P0811-01.

The facility is located in the townland of Painestown, approximately 4.5km south of Slane and 8.5km east of Navan, Co. Meath. The site is located, at its closest, approximately 3.1km south of the River Boyne. The site location is shown in the location map included.

The Dunbia (Slane) facility currently provides Primary Treatment – Stage 1 (flow balancing and removal of solids) at its onsite Waste Water Treatment Plant (WWTP) for wastewaters generated at the facility, followed by the transfer of wastewaters via road tankers to municipal WWTPs for further treatment. The sludges generated during treatment are transferred offsite for landspreading (undertaken in accordance with the Nitrate Regulations).

Dunbia (Slane) are proposing to extend their existing on-site effluent treatment system to provide for additional treatment to a quality sufficient for discharge to the River Boyne. The proposed WWTP development would allow for Primary Treatment – Stage 2 (new flow balancing and

ENVIRONMENTAL IMPACT ASSESSMENT REPORT
DAWN MEATS IRELAND, GREENHILLS, BEAUPARC, NAVAN, CO. MEATH

emergency storage) and Biological Treatment – Stage 3 of wastewaters, resulting in a treated effluent of high quality. This is intended to replace the requirement for further treatment at municipal WWTPs.

Following treatment, Dunbia (Slane) proposes to discharge the treated effluent to the River Boyne. This would involve the construction of an underground pipeline, approximately 3.65km in length, from the Dunbia (Slane) facility to the River Boyne at Dollardstown, Co. Meath. The proposed pipeline would commence at the proposed new build effluent treatment plant on the Dunbia site and travel in an approximate north-west direction to the River Boyne, passing through the townlands of Painestown, Yellow Furze and Dollardstown. The proposed pipeline route is shown in the location map provided, however, this may be subject to change prior to the application being formally made.

Emission limits for effluent entering the River Boyne would be based upon an assimilative capacity assessment undertaken on the River Boyne, which would be required to be agreed with the EPA. Prior to any discharge occurring from the site, an application for review of the site's current IE licence would be required to be approved with the EPA.

It is noted that the River Boyne is designated as a Special Area of Conservation (Site Code: 002299) and as a Special Protection Area (Site Code: 004232).

We would welcome any comments or observations which the Development Applications Unit may have to highlight any particular concerns in relation to the proposed development.

Best Regards,
Lorraine

Lorraine Wyse
Panther Environmental Solutions Ltd
Unit 4, Innovation Centre
Institute of Technology
Carlow, Ireland
R93 W248
Tel: +00353 (0)59-9134222
Email: lorraine@pantherwms.com

ENVIRONMENTAL IMPACT ASSESSMENT REPORT
DAWN MEATS IRELAND, GREENHILLS, BEAUPARC, NAVAN, CO. MEATH

DAU Response (email dated 6th June 2017)



An Roinn Ealaíon, Oidhreachta,
Gnóthaí Réigiúnacha, Tuaithe agus Gaeltachta

Department of Arts, Heritage,
Regional, Rural and Gaeltacht Affairs

Our Ref: **G Pre00112/2017** (*Please quote in all related correspondence*)

06 June 2017

Lorraine Wyse

Panther Environmental Solutions Ltd

Unit 4, Innovation Centre

Institute of Technology

Carlow

Via email to lorraine@pantherwms.com

Re: Pre-planning consultation - Natura Impact Statement for Proposed Development by Dunbia (Slane) at Greenhills, Beauparc, Navan, Co. Meath.

A chara

On behalf of the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs, I refer to correspondence received in connection with the above.

Nature Conservation

This Department notes that this proposed development will involve a new effluent discharge from a WWTP into the River Boyne which is designated as the River Boyne and River Blackwater Special Area of Conservation (SAC) designated under the EC Habitats Directive (Council Directive 92/43/EEC) and Special Protection Area (SPA) designated under the EC Birds Directive (Directive 2009/147 EC).

This Department notes that the discharge will be licenced by the EPA and that a NIS will be produced. With regard to the NIS, and emission limits depending on assimilative capacity, please note that water quality should be assessed in terms of the needs of the qualifying interests (QIs) of the SAC and SPA and, in the case of fauna QIs such as otter and kingfisher, also of their prey species.

ENVIRONMENTAL IMPACT ASSESSMENT REPORT
DAWN MEATS IRELAND, GREENHILLS, BEAUPARC, NAVAN, CO. MEATH

Site-specific, as opposed to generic, conservation objectives are now available for some sites. Each conservation objective for a qualifying interest is defined by a list of attributes and targets and are often supported by further documentation. Where these are not available for a site, such as with the River Boyne and Blackwater SAC and SPA, an examination of the attributes that are used to define site-specific conservation objectives for the same QIs in other sites can be usefully used to ensure the full ecological implications of a proposal for a site's conservation objective and its integrity are analysed and assessed. For example the River Barrow and River Nore SAC may provide some guidance in this regard.

The level of detail provided means the route of the pipeline is not very clear so it is hard to determine if it is to be along roads or across country. It should be noted that there is a large tufa spring in a field upstream of Stackallen Bridge and any pipe laying in the vicinity of this may negatively impact on it. This Department notes that the pipeline route may change. Therefore in order to adequately assess the project it would be necessary to assess all the options which may be chosen.

The location of the discharge appears to be in a wooded area denoted as the Boyne Woods pNHA (site code 001592); the site synopsis for the Boyne Woods pNHA is attached below and please note references to rare plants. In addition badgers may well be present in the wooded areas.

Please find below some general scoping comments for EIS and appropriate assessment screening/appropriate assessment and for licencing requirements which may assist.

EIS

Ecological Survey

With regard to scoping for an EIS for a proposed development, in order to assess impacts on biodiversity, fauna, flora and habitats, an ecological survey should be carried out of the site of the proposed development site including the route of any access roads, pipelines or cables etc. to survey the habitats and species present. Where ex-situ impacts are possible survey work may be required outside of the development sites. Such surveys should be carried out by suitably qualified persons at an appropriate time of the year depending on the species being surveyed for. The EIS should include the results of the surveys, and detail the survey methodology and timing of such surveys. It is expected by this Department that in any survey methodology used that best practice will be adhered to and if necessary non Irish methodology adapted for the Irish situation. The EIS should cover the whole project, including construction, operation and, if applicable, restoration or decommissioning phases. Alternatives examined should also be included in the EIS. Inland Fisheries Ireland should be consulted with regard to fish species if applicable. For

ENVIRONMENTAL IMPACT ASSESSMENT REPORT
DAWN MEATS IRELAND, GREENHILLS, BEAUPARC, NAVAN, CO. MEATH

information on Geological and Geomorphological sites the Geological Survey of Ireland should be consulted.

Baseline data

With regard to the scope of baseline data, details of designated sites can be found at <http://www.npws.ie/>. For flora and fauna the data of the National Parks and Wildlife Service (NPWS) should be consulted at <http://www.npws.ie/>. Where further detail is required on any information on the website <http://www.npws.ie/>, a data request form should be submitted. This can be found at <https://www.npws.ie/sites/default/files/general/Data%20request%20form.doc>. Other sources of information relating to habitats and species include that of the National Biodiversity Data Centre (www.biodiversityireland.ie), Inland Fisheries Ireland (www.fisheriesireland.ie), BirdWatch Ireland (www.birdwatchireland.ie) and BatConservation Ireland (www.batconservationireland.org). Data may also exist at a County level within the Planning Authority

Impact assessment

The impact of the development on the flora, fauna and habitats present should be assessed. In particular the impact of the proposed development should be assessed, where applicable, with regard to:

- Natura 2000 sites, i.e. Special Areas of Conservation (SAC) designated under the EC Habitats Directive (Council Directive 92/43/EEC) and Special Protection Areas designated under the EC Birds Directive (Directive 2009/147 EC),
- Other designated sites, or sites proposed for designation, such as Natural Heritage Areas and proposed Natural Heritage Areas, Nature Reserves and Refuges for Fauna or Flora, designated under the Wildlife Acts 1976 to 2012,
- Species protected under the Wildlife Acts including protected flora,
- 'Protected species and natural habitats', as defined in the Environmental Liability Directive (2004/35/EC) and European Communities (Environmental Liability) Regulations, 2008, including Birds Directive – Annex I species and other regularly occurring migratory species, and their habitats (wherever they occur) and Habitats Directive – Annex I habitats, Annex II species and their habitats, and Annex IV species and their breeding sites and resting places (wherever they occur),
- Important bird areas such as those identified by Birdlife International,
- Features of the landscape which are of major importance for wild flora and fauna, such as those with a "stepping stone" and ecological corridors function, as referenced in Article 10 of the Habitats Directive.
- Other habitats of ecological value in a national to local context (such as those identified as locally important biodiversity areas within Local Biodiversity Action Plans and County Development Plans).

ENVIRONMENTAL IMPACT ASSESSMENT REPORT

DAWN MEATS IRELAND, GREENHILLS, BEAUPARC, NAVAN, CO. MEATH

- Red data book species,
- and biodiversity in general.

Reference should be made to the National Biodiversity Plan and any relevant County Biodiversity Plan. Any losses of biodiverse habitat associated with this proposed development (including access roads and cabling) such as woodland, scrub, hedgerows and other habitats should be mitigated for.

In order to assess the above impacts it may be necessary to obtain hydrological and/or geological data. In particular any impact on water table levels or groundwater flows may impact on wetland sites some distance away. The EIS should assess cumulative impacts with other plans or projects if applicable. Where negative impacts are identified suitable mitigation measures should be detailed if appropriate. As EU Member States have to report every 6 years on the National resource of habitats and species listed under the Habitats Directive it is important that any impact on such habitats and species both inside and outside of Natura 2000 sites is recorded.

Alien invasive species

The EIS should also address the issue of invasive alien plant and animal species, such as Japanese Knotweed, and detail the methods required to ensure they are not accidentally introduced or spread during construction. Information on alien invasive species in Ireland can be found at <http://invasives.biodiversityireland.ie/> and at <http://invasivespeciesireland.com/>.

Hedgerows and protected species

Hedgerows form important wildlife corridors and provide areas for birds to nest in. In addition badger setts may be present. If suitable trees are present bats may roost there and they use hedgerows as flight routes. Hedgerows also provide a habitat for woodland flora. Where a hedgerow forms a townland or other historical boundary it is usually an old hedgerow. Such hedgerows will contain more biodiversity than a younger hedgerow. Hedgerows should be maintained where possible. The EIS should provide an estimate of the length of hedgerow that will be lost, if any. Where trees or hedgerows have to be removed there should be suitable planting of native species in mitigation. Where possible hedgerows and trees should not be removed during the nesting season (i.e. March 1st to August 31st). Bird's nests can only be intentionally destroyed under licence issued under the Wildlife Acts of 1976 to 2012.

Bats

Bat roosts may be present in trees, buildings and bridges. Bat roosts can only be destroyed under licence under the Wildlife Acts and a derogation under the Birds and

ENVIRONMENTAL IMPACT ASSESSMENT REPORT
DAWN MEATS IRELAND, GREENHILLS, BEAUPARC, NAVAN, CO. MEATH

Natural Habitats Regulations and such a licence would only be given if suitable mitigation measures were implemented. Where so called bat friendly lighting is proposed as mitigation then it should be proven to work as mitigation.

Rivers and Wetlands

Wetlands are important areas for biodiversity. Any watercourse or wetland impacted on should be surveyed for the presence of protected species and species listed on Annexes II and IV of the Habitats Directive. These species could include otters (*Lutra lutra*), which are protected under the Wildlife Acts and listed on Annexes II and IV of the Habitats Directive, Salmon (*Salmo salar*) and Lamprey species listed on Annex II of the Habitats Directive, and White-clawed Crayfish (*Austropotamobius pallipes*) which are protected under the Wildlife Acts and listed on Annex II of the Habitats Directive, Frogs (*Rana temporaria*) and Newts (*Triturus vulgaris*) protected under the Wildlife Acts and Kingfishers (*Alcedo atthis*) protected under the Wildlife Acts and listed on Annex I of the Birds Directive (Council Directive 79/409 EEC). One of the main threats identified in the threat response plan for otter is habitat destruction (see http://www.npws.ie/sites/default/files/publications/pdf/2009_Otter_TRP.pdf).

In addition a 10m riparian buffer on both banks of a waterway is considered to comprise part of the otter habitat. Therefore any proposed development should be located at least 10m away from the waterway.

A suitable riparian habitat should be left along each watercourse. Construction work should not be allowed impact on water quality and measures should be detailed in the EIS to prevent sediment and/or fuel runoff from getting into watercourses which could adversely impact on aquatic species. Flood plains, if present, should be identified in the EIS and left undeveloped to allow for the protection of these valuable habitats and provide areas for flood water retention. If applicable the EIS should take account of the guidelines for Planning Authorities entitled "The Planning System and Flood Risk Management" and published by the Department of the Environment, Heritage and Local Government in November 2009.

IFI should be consulted with regard to impacts on fish species and the applicant may find it useful to consult their publication entitled "Planning for watercourses in the urban environment" which can be downloaded from their web site at <http://www.fisheriesireland.ie/fisheries-management-1/86-planning-for-watercourses-inthe-urban-environment-1> .

Water quality

Ground and surface waters quality should be protected during construction and operation of the proposed development and if applicable the applicant should ensure that adequate

ENVIRONMENTAL IMPACT ASSESSMENT REPORT
DAWN MEATS IRELAND, GREENHILLS, BEAUPARC, NAVAN, CO. MEATH

sewage treatment facilities are or will be in place prior to any development. The applicant should also ensure that adequate water supplies are present prior to development.

Green Infrastructure

From a biodiversity point of view it is important to take note of the EU Green Infrastructure Strategy. Further information on this can be found at http://ec.europa.eu/environment/nature/ecosystems/docs/green_infrastructure_broc.pdf. Care should be taken to ensure that green infrastructure involves greening existing infrastructure rather than adding built infrastructure to existing biodiversity corridors. With regard to waterways, the applicant may find it useful to consult the IFI publication entitled "Planning for watercourses in the urban environment" which can be downloaded from their web site at <http://www.fisheriesireland.ie/fisheries-management-1/86-planning-for-watercourses-in-the-urban-environment-1>.

CMPs

Complete project details including construction management plans (CMPs) need to be provided in order to allow an adequate assessment to be undertaken. Applicants need to be able to demonstrate that CMPs and other such plans are adequate and effective mitigation, supported by scientific information and analysis, and that they are feasible within the physical constraints of the site. The positions, locations and sizes of construction infrastructure and mitigation, such as settlement ponds, disposal sites and construction compounds, may significantly affect European sites, other designated sites, habitats, and species in their own right and could have an effect for example on drainage, water quality, habitat loss, and disturbance. If these are undetermined at time of the assessment, all potential effects of the development on the site are not being considered. If applicants are not in a position to decide the exact location and details of these at time of application, then they need to consider the range of options that may be used in their assessment so that all issues are covered.

Appropriate Assessment

Guidance

Guidance on AA is available in the Departmental guidance document on Appropriate Assessment, which is available on the NPWS web site at http://www.npws.ie/sites/default/files/publications/pdf/NPWS_2009_AA_Guidance.pdf and in the EU Commission guidance entitled "Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC" which can be downloaded from http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura_2000

ENVIRONMENTAL IMPACT ASSESSMENT REPORT
DAWN MEATS IRELAND, GREENHILLS, BEAUPARC, NAVAN, CO. MEATH

[_assess_en.pdf](#) . However CJEU and Irish case law has clarified some issues and should also be consulted.

Conservation objectives

In order to carry out the appropriate assessment screening, and/or prepare the Natura Impact Statement (NIS), information about the relevant Natura 2000 sites including their conservation objectives will need to be collected. Details of designated sites and species and conservation objectives can be found on <http://www.npws.ie/>. Site-specific, as opposed to generic, conservation objectives are now available for some sites. Each conservation objective for a qualifying interest is defined by a list of attributes and targets and are often supported by further documentation. Where these are not available for a site, an examination of the attributes that are used to define site-specific conservation objectives for the same QIs in other sites can be usefully used to ensure the full ecological implications of a proposal for a site's conservation objective and its integrity are analysed and assessed. It is advised, as per the notes and guidelines in the site-specific conservation objectives, that any reports quoting conservation objectives should give the version number and date, so that it can be ensured and established that the most up-to-date versions are used in the preparation of Natura Impact Statements and in undertaking appropriate assessments.

Where further detail is required on any information on the website <http://www.npws.ie/> , a data request form should be submitted. This can be found at <https://www.npws.ie/sites/default/files/general/Data%20request%20form.doc> .

Cumulative and ex situ impacts

A rule of thumb often used is to include all Natura 2000 sites within a distance of 15km. It should be noted however that this will not always be appropriate. In some instances where there are hydrological connections a whole river catchment or a groundwater aquifer may need to be included. Similarly where bird flight paths are involved the impact may be on an SPA more than 15 km away.

Other relevant Local Authorities should be consulted to determine if there are any projects or plans which, in combination with this proposed development, could impact on any Natura 2000 sites.

Water and wastewater

If this development is not on mains sewerage then impacts from wastewater, including cumulative impacts, on groundwater and any nearby surface waters or wetland habitats should be assessed. In addition if it is not on mains water supply then impacts, including cumulative impacts, relating to water abstraction should be assessed. This may require

ENVIRONMENTAL IMPACT ASSESSMENT REPORT
DAWN MEATS IRELAND, GREENHILLS, BEAUPARC, NAVAN, CO. MEATH

hydrogeological information. Where connection will be to existing infrastructure the impact of the demand for additional potable water, waste water treatment, and additional surface runoff should be assessed.

Alien invasive species

If the proposed development is adjacent to a Natura 2000 site and involves construction, landscaping or a garden, care should be taken to ensure that no terrestrial or aquatic invasive species are used which could impact negatively on these sites. Information on alien invasive species in Ireland can be found at <http://invasives.biodiversityireland.ie/> and at <http://invasivespeciesireland.com/>.

CMPs

Complete project details including construction management plans (CMPs) need to be provided in order to allow an adequate appropriate assessment to be undertaken. Applicants need to be able to demonstrate that CMPs and other such plans are adequate and effective mitigation, supported by scientific information and analysis, and that they are feasible within the physical constraints of the site. The positions, locations and sizes of construction infrastructure and mitigation, such as settlement ponds, disposal sites and construction compounds, may significantly affect European sites, designated sites, habitats, and species in their own right and could have an effect for example on drainage, water quality, habitat loss, and disturbance. If these are undetermined at time of the assessment, all potential effects of the development on the site are not being considered. If applicants are not in a position to decide the exact location and details of these at time of application, then they need to consider the range of options that may be used in their assessment so that all issues are covered. The CMP should also include methods to ensure invasive alien species are not introduced or spread. This Department understands that it may not be possible to have final pipeline route details until a grid connection agreement is given. However, if applicants are not in a position to decide the exact location and details at time of application, then they need to consider the range of options that may be used in their assessment so that all issues are covered

Licences

Where there are impacts on protected species and their habitats, resting or breeding places, licences may be required under the Wildlife Acts or derogations under the Habitats Regulations. In particular bats and otters are strictly protected under annex IV of the Habitats Directive and a copy of Circular Letter NPWS 2/07 entitled "Guidance on Compliance with Regulation 23 of the Habitats Regulations 1997 – strict protection of certain species/applications for derogation licences" can be found on the Departmental web site at <http://www.npws.ie/sites/default/files/general/circular-npws-02-07.pdf>. It

ENVIRONMENTAL IMPACT ASSESSMENT REPORT
DAWN MEATS IRELAND, GREENHILLS, BEAUPARC, NAVAN, CO. MEATH

should be noted however that this Regulation has been replaced by SI 477 of 2011 and that section 53 is the relevant section.

In addition licences will be required if there are any impacts on other protected species or their resting or breeding places, such as on protected plants, badger setts or birds nests. Where possible hedges and trees should not be removed during the nesting season (i.e. March 1st to August 31st). Bird's nests can only be intentionally destroyed under licence issued under the Wildlife Acts of 1976 to 2012.

In order to apply for any such licences or derogations as mentioned above the results of a survey should be submitted to the National Parks and Wildlife Service of this Department. Such surveys are to be carried out by appropriately qualified person/s at an appropriate time of the year. Details of survey methodology should also be provided. Such licences should be applied for in advance of planning to avoid delays and in case project modifications are necessary.

Should this survey work take place well before construction commences, it is recommended that an ecological survey of the development site should take place immediately prior to construction to ensure no significant change in the baseline ecological survey has occurred. If there has been any significant change mitigation may require amendment and where a licence has expired, there will be a need for new licence applications for protected species.

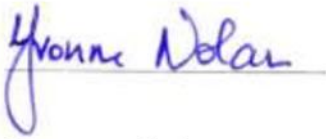
The above observations and recommendations are based on the papers submitted to this Department on a pre-planning basis and are made without prejudice to any observations the Minister may make in the context of any consultation arising on foot of any development application referred to the Minister, by a planning authority, in her role as statutory consultee under the Planning and Development Act 2000, as amended.

You are requested to send further communications to this Department's Development Applications Unit (DAU) at manager.dau@ahg.gov.ie (team monitored); if this is not possible, correspondence may alternatively be sent to:

The Manager
Development Applications Unit (DAU)
Department of Arts, Heritage and the Gaeltacht
Newtown Road
Wexford
Y35 AP90

ENVIRONMENTAL IMPACT ASSESSMENT REPORT
DAWN MEATS IRELAND, GREENHILLS, BEAUPARC, NAVAN, CO. MEATH

Is mise, le meas



Yvonne Nolan,
Development Applications Unit

Meath CC, Planning Department, Viewing Purposes Only!

ENVIRONMENTAL IMPACT ASSESSMENT REPORT
DAWN MEATS IRELAND, GREENHILLS, BEAUPARC, NAVAN, CO. MEATH

Consultation Request Letter to DAU (email dated 21st December 2018)

From: Lorraine (Panther Environmental Solutions Ltd.)

Sent: Friday 21 December 2018 14:25

To: Manager Dau <Manager.Dau@chg.gov.ie>

Subject: Planning Application Consultation - Proposed Development by Dawn Meats (Slane), Co. Meath

Dear Sir / Madam,

Panther Environmental Solutions Limited have been requested by Dawn Meats (Slane) to prepare an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement as required under the Habitats Directive with respect to an application for planning permission to Meath County Council for the construction of alterations to an existing approved effluent plant development (Planning Ref: LB180300) at Painestown, Beauparc, Navan, Co. Meath, and construction of new treated effluent rising main pipeline to a proposed outfall at River Boyne. The construction phase of the development, as well as cumulative impacts with other developments in the area will also be addressed.

The Development Applications Unit was previously consulted on the 3rd of May 2017, in relation to the planning application submitted for the construction of an extension to the existing waste water treatment plant at Painestown, Beauparc, Navan, Co. Meath (Planning Ref: LB180300), and a response received on the 6th of June 2017 (Ref. G Pre 00112/2017). At the time of the LB180300 application, the applicant intended to provide for the discharge of final effluent to the River Boyne, however, this did not form part of the proposed development as a feasible pipeline route had yet to be determined. The EIAR and associated documents for the previous planning application included a preliminary assessment on the potential risks arising from such a future development.

A potential final effluent rising main route has now been determined, subject to final agreement with the relevant landowners, and thus is included as part of the new planning application to Meath County Council.

While it is understood that the National Parks and Wildlife Service will be consulted during the planning application process, we would welcome any comments or observations which the Development Applications Unit may have in relation to the proposed development in the preparation of documents for the application.

It is noted that any further comments/observations made during consideration of the planning application, once made, would also be considered as part of relevant assessments.

Dawn Meats (Slane) is a producer and processor of beef products. This site takes in live cattle and produces sides and quarters for further processing at other Dawn Meats sites or direct sale. The site holds an Industrial Emissions (IE) Licence with the Environmental Protection Agency (EPA), Registration No. P0811-02.

ENVIRONMENTAL IMPACT ASSESSMENT REPORT
DAWN MEATS IRELAND, GREENHILLS, BEAUPARC, NAVAN, CO. MEATH

The facility is located in the townland of Painestown, approximately 4.5km south of Slane and 8.5km east of Navan, Co. Meath, while the proposed treated effluent rising main would be located within the townlands of Painestown, Seneschalstown, Dollardstown and Ardmulchan. The site location and proposed rising main route is shown in the location map included.

The Dawn Meats (Slane) facility currently provides Primary Treatment – Stage 1 (flow balancing and removal of solids) at its onsite Waste Water Treatment Plant (WWTP) for wastewaters generated at the facility, followed by the transfer of wastewaters via road tankers to municipal WWTPs for further treatment. The sludges generated during treatment are transferred offsite for landspreading (undertaken in accordance with the Nitrate Regulations).

The currently approved development (Planning Ref: LB180300) would allow for Primary Treatment – Stage 2 (new flow balancing and emergency storage) and Biological Treatment – Stage 3 of wastewaters, resulting in a treated effluent of high quality. This is intended to replace the requirement for further treatment at municipal WWTPs.

Following treatment, Dawn Meats (Slane) proposes to discharge the treated effluent to the River Boyne. This would involve the construction of an underground rising main pipeline, approximately 3.65km in length, from the Dawn Meats (Slane) facility to the River Boyne at Dollardstown, Co. Meath. The proposed pipeline would commence at the proposed new build wastewater treatment plant on the Dawn Meats (Slane) site and travel in an approximate north-west direction to the River Boyne, passing through the townlands of Painestown, Seneschalstown, Dollardstown and Ardmulchan. The proposed pipeline route is shown in the location map provided, however, this may be subject to change prior to the application being formally made.

Emission limits for treated effluent entering the River Boyne would be based upon an assimilative capacity assessment undertaken on the River Boyne, which would be required to be agreed with the EPA. Prior to any discharge occurring from the site, an application for review of the site's current IE licence would be required to be approved with the EPA.

It is noted that the River Boyne is designated as a Special Area of Conservation (Site Code: 002299) and as a Special Protection Area (Site Code: 004232).

We would welcome any comments or observations which the Development Applications Unit may have to highlight any particular concerns in relation to the proposed development.

Best Regards,
Lorraine



ENVIRONMENTAL IMPACT ASSESSMENT REPORT
DAWN MEATS IRELAND, GREENHILLS, BEAUPARC, NAVAN, CO. MEATH

DAU Response (email dated 13th February 2019)

An Roinn Cultúir,
Oidhreacht agus Gaeltachta
Department of Culture,
Heritage and the Gaeltacht



Our Ref: G Pre00007/2019
(Please quote in all related correspondence)

13 February 2019

Lorraine Wyse,
Panther Environmental Solutions Ltd
Units 3 & 4, Innovation Centre
Institute of Technology
Green Road
Carlow
Via email: lorraine@pantherwms.com

Re: Environmental Impact Assessment Report (EIAR) and Natura Impact Statement for proposed planning application for the construction of alterations to an existing approved effluent plant development (Planning Ref: LB180300) and the construction of new treated effluent rising main pipeline to a proposed outfall at River Boyne in Painestown, Beauparc, Navan, County Meath

A chara

On behalf of the Department of Culture, Heritage and the Gaeltacht, I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department under the stated heading.

Archaeology

Given the high archaeological potential of the general area and the proximity of the development to the River Boyne this Department recommends that your clients engage the services of a suitably qualified archaeologist to carry out appropriate archaeological assessment of the proposed route way and to describe details of the construction plans for the pipeline. There should be a description of all archaeological impacts and likely impacts should planning permission be granted for the development. The assessment report should also include details of the proposed mitigation of any such impacts.

Should you have any further details or information concerning the route of the waste-water pipeline please do not hesitate to contact the Department.

The above observations/recommendations are based on the papers submitted to this Department on a pre-planning basis and are made without prejudice to any observations that the Minister may make in the context of any consultation arising on foot of any

ENVIRONMENTAL IMPACT ASSESSMENT REPORT
DAWN MEATS IRELAND, GREENHILLS, BEAUPARC, NAVAN, CO. MEATH



development application referred to the Minister, by the planning authority/ies, in her/his role as statutory consultee under the Planning and Development Act, 2000, as amended.

You are requested to send further communications to this Department's Development Applications Unit (DAU) at manager.dau@cha.gov.ie (team monitored); if this is not possible, correspondence may alternatively be sent to:

The Manager
Development Applications Unit (DAU)
Department of Culture, Heritage and the Gaeltacht
Newtown Road
Wexford
Y35 AP90

Is mise, le meas

A handwritten signature in blue ink, which appears to read 'Sinéad O'Brien', is placed above a horizontal line.

Sinéad O'Brien
Development Applications Unit