SCREENING FOR APPROPRIATE ASSESSMENT

Enva Healthcare Risk Waste Facility Development at 402 Grants Drive, Greenogue Business Park, Rathcoole, Co. Dublin, D24 AP04

April 2024

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1 INTRODUCTION

1.1 Scope of Report

Enva Ireland Ltd (hereafter, "Enva") currently operates a hazardous waste transfer/recovery facility within Greenogue Business Park located at 402 Grants Drive, Greenogue Business Park, Rathcoole, Co. Dublin, Eircode D24 AP04. The site is managed in accordance with the requirements of an existing planning approval (Planning Application reference SD09A/0050) and Environmental Protection Agency (EPA) industrial Emissions licence (IED Licence W0192-03).

Enva is planning to modify the existing hazardous waste transfer/ recovery facility to replace some of the activities to disinfect 24,000 tonnes per annum of Healthcare Risk Waste (HRW), prior to its onward consignment to energy recovery treatment (hereafter referred to as "the Proposed Development").

RPS has been commissioned by Enva to prepare this report to inform Appropriate Assessment (AA) Screening of the Proposed Development. The screening has been prepared to inform planning consent for the Proposed Development as well as any associated EPA licence changes which will be required with respect to the proposed operational changes.

This report comprises information in support of screening for AA of the Proposed Development sought in line with the requirements of Article 6(3) of the EU Habitats Directive (92/43/EEC) on the Conservation of Natural Habitats and of Wild Fauna and Flora as transposed into Irish law through the European Communities (Birds and Natural Habitats) Regulations, as amended.

AA is a process for undertaking a comprehensive ecological impact assessment of a plan, examining its implications, on its own or in-combination with other plans and projects, on one or more European Sites in view of the sites' Conservation Objectives, as referred to in Article 6(3) of the EU Habitats Directive.

1.2 Legislative Context

The Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora, better known as 'The Habitats Directive', provides legal protection for habitats and species of European importance. Articles 3 to 9 provide the legislative means to protect habitats and species of Community interest through the establishment and conservation of a European Union-wide network of sites known as Natura 2000 (hereafter referred to as 'European sites'). In the Republic of Ireland, European sites comprise:

- Special Areas of Conservation (SACs) designated for habitats, plants, and non-bird species, under the Habitats Directive (92/43/EEC);
- Special Protection Areas (SPAs) designated for bird species and their habitats, under the Birds Directive (79/409/ECC as codified by Directive 2009/147/EC); and
- 'Candidate' sites including 'cSACs'. The process of designating cSACs as SACs is ongoing in Ireland. The term SAC is used throughout this report for both SACs and cSACs, given they are subject to equal protection.

Each European site has assigned Conservations Objectives (CO) and a list of Qualifying Interests (QIs) and/or Species of Conservation Interest (SCI). The Conservation Objective (CO) concept appears in the eighth recital of Directive 92/43/EEC which reads: '*whereas it is appropriate, in each area designated, to implement the necessary measures having regard to the conservation objectives pursued*'. Article 1 then explains that '*conservation means a series of measures required to maintain or restore the natural habitats and the populations of species of wild fauna and flora at a favourable status*'.

National Parks and Wildlife Services (NPWS) publish COs for European sites on their website. NPWS advise in the general introductory notes of their site-specific Conservation Objective (SSCO) series publications, that an AA based on their '*published conservation objectives will remain valid even if the conservation objective targets are subsequently updated, providing they were the most recent objectives available when the assessment was carried out*'. NPWS advise that to assist in that regard, it is essential that the date and version are included when objectives are cited.

Articles 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans and projects likely to have a significant effect on or to adversely affect the integrity of European sites (Annex 1.1). Article 6(3) establishes the requirement for AA:

'Any plan or project not directly connected with or necessary to the management of the [European] site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subjected to appropriate assessment of its implications for the site in view of the site's conservation objectives. In 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(4) states:

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

1.3 Stages of Appropriate Assessment

AA can be considered in four, iterative, stages. These are summarised below. This report only considers Stage 1 – Screening; however, Stages 2 to 4, inclusive, are also described by way of context.

Stage 1: Screening / Test of Significance

This process identifies whether the facility is directly connected to or necessary for the management of a European site(s) and identifies whether the development is likely to have significant impacts upon a European site(s) either alone or in combination with other projects or plans. The output from this stage is a determination for each European site(s) of not significant, significant, potentially significant, or uncertain effects. The latter three determinations will cause that site to be brought forward to Stage 2.

Stage 2: Appropriate Assessment

This stage considers the impact of the facility on the integrity of a European site(s), either alone or in combination with other projects or plans, with respect to: (i) the site's conservation objectives; and (ii) the site's structure, function, and its overall integrity. Additionally, where there are adverse impacts, an assessment of the potential mitigation of those impacts is undertaken.

The output from this stage is a Natura Impact Statement (NIS). This document must include sufficient information for the competent authority to carry out the AA. If the assessment is negative, i.e., adverse effects on the integrity of a site cannot be excluded, then the process must consider alternatives (Stage 3) or proceed to Stage 4.

Stage 3: Assessment of Alternatives

This process examines alternative ways of achieving the objectives of the project that avoid adverse impacts on the integrity of the European site. This assessment may be carried out concurrently with Stage 2 in order to find the most appropriate solution. If no alternatives exist or all alternatives would result in negative impacts to the integrity of the European sites, then the process either moves to Stage 4 or the project is abandoned.

Stage 4: Assessment where Adverse Impacts Remain

This stage includes the identification of compensatory measures where, in the context of Imperative Reasons of Overriding Public Interest (IROPI), it is deemed that the project or plan should proceed.

2 DESCRIPTION OF THE PROPOSED DEVELOPMENT

2.1 Site Location

The Proposed Development site is in Greenogue Business Park which is in south-west County Dublin and in the administrative area of South Dublin County Council (SDCC). The business park is adjacent to Newcastle village and approximately 1.5 km north of the village of Rathcoole. The site is primarily accessed from the south by the R120 road which joins the N7, the Dublin to Limerick Road.

In terms of access, the business park is situated north of the N7 (Naas Road) route and is a short distance from the M50 route (c.7 km east) and is accessible from Dublin Airport and Dublin Port via the Port Tunnel. The business park can be accessed from the N7 by the R120, which is located to the west and north of the business park. The site itself can be access from the R120 by Grants Road.

The surrounding environs is typically urban with a mix of commercial, industrial and transport activity, including Aerdrome Business Park, Baldonnell Business Park, and Citywest Business Campus. Residential areas in the vicinity include Newcastle Village, and Rathcoole which is on the eastern side of the M7 from the facility.

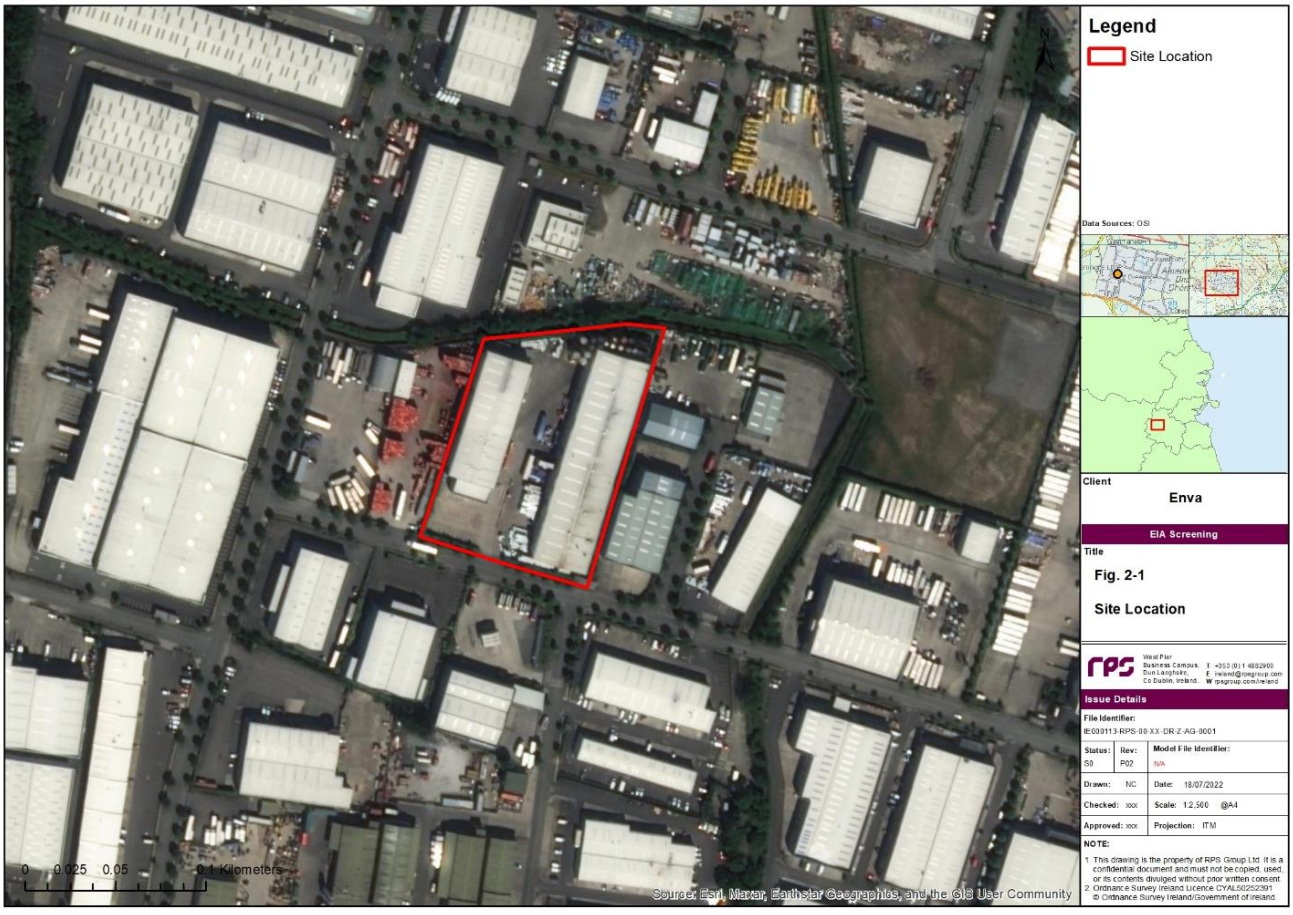

Figure 2-1: Site Location

2.2 Scope of the Proposed Development

Enva currently operates a hazardous waste transfer/recovery facility within Greenogue Business Park in southwest County Dublin. The existing layout is shown in **Figure 2-2**.

This site covers approximately 1.1 hectares, and it is covered extensively in hard standing concrete and buildings. The site is bounded to the north by the Griffeen River, to the south by Grants Drive, to the east by an adjoining commercial holding, primarily used for vehicle parking and to the west by two adjoining commercial holdings, primarily used for vehicle parking.

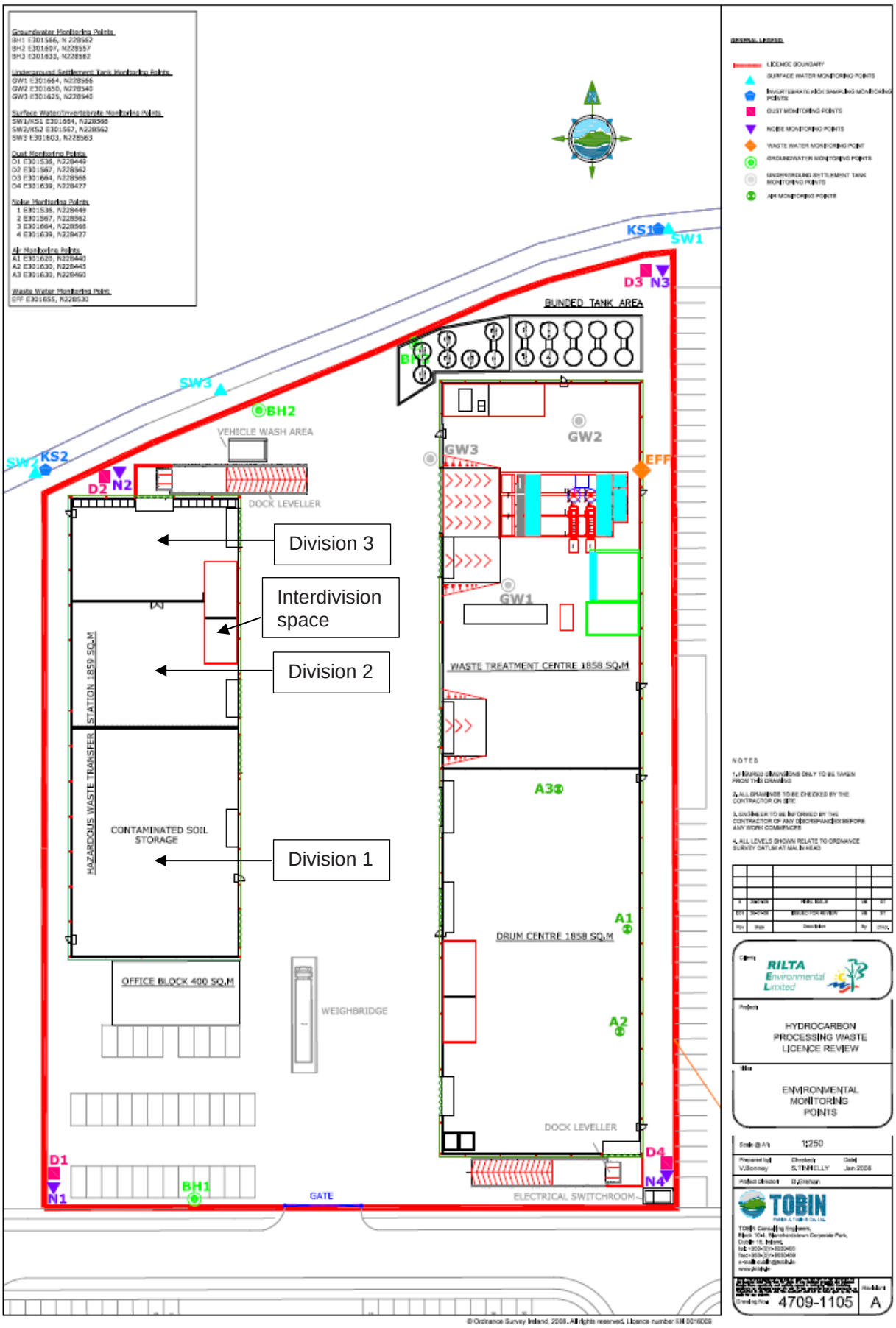

Figure 2-2: Existing Site Layout showing current Building 1 subdivisions

Current activities include a hazardous waste transfer facility for contaminated soil, packaged waste and transformers (Building 1). There is also a hydrocarbon waste treatment and drum recovery centre (Building 2). Building 3 comprises the existing offices. The Proposed Development involves modifications to Building 1 and 3, to replace some of the activities to disinfect 24,000 tonnes per annum of HRW, prior to its onward consignment to energy recovery treatment.

HRW arises from healthcare or health related facilities and is understood to be any waste that poses a risk due to its potential infectious nature and includes items contaminated with blood or body fluids, contaminated waste from patients with transmissible infectious diseases and other healthcare infectious waste. The emphasis in the approach adopted in recent years has been to manage hospital waste by segregating HRW waste from the bulk of waste, which is domestic in nature.

The Enva facility and change of activity at the site comprises the addition of a HRW process to the existing waste processing facility and the displacement of the existing contaminated soil waste management process. The addition of HRW will not increase the level of waste being processed beyond that which is permitted under Reg. Ref. SD07A/0260 and will not lead to any intensification of use.

2.2.1 Construction Works

The duration of the construction works for the Proposed Development would be approximately 18 weeks. The proposed core construction on site working hours will be from 8:00 AM to 7:00 PM Monday to Friday and from 8:00 AM to 4:00 PM on Saturdays. Normal construction working hours will be observed for structural and external works. Construction staff facilities will be provided on site and construction staff will not typically depart from site during their working day. Access to the existing on-site office, kitchen and toilet facilities will be made available for use by the construction personnel.

2.2.1.1 Preparatory Works

The following preparatory works are to be undertaken:

- Demolition of the existing office space (366 m^2) on the gable side of the building facing Grants Drive.

  The existing office space on the gable side of the building facing Grants Drive (Building 3) is to be demolished. This building comprises block and steel cladding with associated office fixtures and fittings.
- Removal of existing hazardous soil management and hazardous waste transfer operations located in Division 1 and 2 of Building 1, along with associated fixtures and fittings. Decontamination of these divisions may be required and will be determined during the decommissioning phase.
- Removal of existing fixtures and fittings in the interdivisional space between Division 2 and 3.
- Modifications to the car parking area including the repainting of the lines and of the footpath. A small number of spaces may be lost.

2.2.1.2 Thermal Treatment and Trailer Loading Area

A thermal treatment area will be installed in Division 1 of Building 1, supported by the following new plant and equipment:

- A bin-emptying unit that collects waste into a hopper and shredder. The shredded waste is subsequently fed into thermal screws.
- Two thermal screws designed to disinfect healthcare risk waste through steam heat application.
- An air management system comprising:
  - A HEPA filter to manage air emissions from the shredder area.
  - Hoods over the shredders to capture and filter air emissions.
  - Fans to service the system.
  - A condenser
  - A carbon filter.
  - A stack with a 300 mm diameter protruding up to 2 m from the eastern edge of the roof.

  - An access platform for stack sampling.
- A natural gas-fired steam generation boiler, complete with associated pipework and a mains connection.
- A blast chiller situated on the western face of Building 1 to cool hydraulic oils.
- A weighing cell and reception area for recording incoming and outgoing materials.
- Washing units to wash and disinfect emptied bins.
- A bin reception and marshalling area for temporary storage of incoming bins prior to emptying and subsequent washing.
- Construction of a new roofed enclosure approximately 130 m^2 (dimensions 6.6 m wide x 19.9 m long and 6.2 m high) located to the east face of the Building 1 for storage of clean bins.
- A new steel-clad structure, approximately 191 m^2 and 9.1 m in height will be constructed to accommodate two bulk trailers. This structure will be erected on roughly the same footprint as the office building slated for demolition and will be serviced by a conveyor system that transports waste from the thermal screws to the trailers.

2.2.1.3 Office, Canteen, and Welfare Facilities Area

An office, canteen, and welfare facilities will be installed on the upper floor of the interdivisional space between Division 2 and 3. This area will include:

- Office space;
- Shower, wash, and toilet facilities; and
- A kitchen and break room.

2.2.1.4 Health Risk Waste Bulking-Up Transfer Area

A Health Risk Waste bulking-up transfer area will be installed, comprising:

- A new mezzanine floor in Division 2, attached to the interdivisional space between Division 2 and 3;
- A steel staircase and two service lifts for transporting incoming and outgoing waste; and
- A storage area for Health Risk Waste during the bulking-up process.

2.2.1.5 Sharps Management Equipment and Facilities

Sharps management equipment and facilities will be installed, including:

- A loading area equipped with a robotic arm to empty sharps containers into a wheeled bin;
- A sharps container wash conveyor belt, loaded by the robotic arm, for washing and disinfecting sharps containers; and
- A storage area for short-term storage of washed and disinfected sharps containers.

2.2.1.6 Ancillary Services and Infrastructure

The development will be supported by the installation and/or connection of:

- Ancillary services supply, including electricity, water, telecoms, and natural gas;
- The existing site weighbridge, with office services to be relocated to a new portacabin-type weighbridge office structure (4.3 m^2 and 2.7 m in height) at the main entrance to the facility situated beside the main facility gate;
- A footpath connecting the car parking area to the new portacabin-type weighbridge office structure, also providing access to Building 2;
- Modifications to integrate wastewater into the *existing* wastewater management system;
- Modifications to integrate stormwater into the *existing* stormwater management system; and

- Alterations to the existing lighting system, as required.

2.2.2 Lighting

The following changes to the facility lighting arrangements will be required:

- There will be a small bin store attached to Building 1. New lighting will be provided for this area.
- New lighting will be provided for the new approximately 191 m^2 steel-clad structure providing space for two bulk trailers will be constructed on approximately the same footprint as the existing office.
- A new portacabin type structure will be installed inside and west of the main entrance to the facility. New lighting will be provided for the new configuration.
- The existing lighting arrangements in the yard, including in the entrance area where the footpath will be located will be reviewed considering the new operation. Changes (additions, removals, relocations) may be made to the existing lighting based on this review. All artificial lighting installed on site shall be directional lighting (i.e., lighting which only shines on the required working area and not adjacent habitats) to prevent overspill onto the Griffeen River corridor and surrounding hedgerows. This will be achieved by the design of the luminaire and by using accessories such as hoods, cowls, louvers and shields to direct the light to the intended area within the Proposed Development site only.
- The internal changes to Building 1 that will require additional lighting.
- The proposed stack will not exceed a maximum of 2 m above the eastern edge of the roof and will not require a navigation beacon (TBC).

When new lighting is installed, this lighting would be energy efficient using low energy Light Emitting Diodes (LEDs) or lighting of similar efficiency.

2.3 Overview of the Proposed Processes

Three processes will be undertaken within the proposed HRW management facility. A summary of the proposed processes is provided in **Sections 2.3.1** to **2.3.3**.

2.3.1 Process 1 - Reception and Disinfection of HRW

HRW materials received will be moved into a reception area Building 1. Here, the materials will be registered, weighed, and consigned to the appropriate process. The treatment process for the Health Risk Waste materials is a fully automated technology that shreds then applies steam heat disinfection. The system used will be designed to shred and disinfect appropriate forms of Health Risk Waste - biohazardous, hospital, and biomedical waste including sealed containers and their contents. The process reduces the waste by up to 80 % in volume.

Two separate, parallel treatment units are proposed. These units will operate 7 days/week, 50 weeks (351 days) per annum. The equipment operation is continuous, but throughput varies by the hours of operation. Once the process is complete the disinfected waste is discharged from the treatment lines into a self-contained enclosed conveyer system which will move the waste and discharge into the bulking trailers. The trailers will be equipped with walking floors to aid loading. The bulk trailers will be parked and loaded inside an enclosure that will be at approximately 9.1 m in height.

The shredded and treated HRW material will then be consigned off site for recovery. It is proposed to manage the disinfected waste by thermal recovery by incineration in the Republic of Ireland. Disinfection treatment lines will be supported by bin washing, bin reception/scanning/weighing, bin storage and other facilities. The bin washing units will wash bins in a short rotation time, with manual loading and unloading. The bulk trailers will be parked and loaded (via a conveyor system) with treated material for removal offsite. This enclosure will be at the same height as the existing office.

2.3.2 Process 2 - Reusable Sharps Containers Management

HRW sharps (such as needles, blades, and other sharp medical instruments) will be conveyed to the facility in standard sized reusable sharps containers. These containers will be received, weighed, logged, and fed to an automated processing line located in the 'interdivision' space between Division 2 and 3 of Building 1. The processing line will feed the containers into an automated emptying system. The containers will continue into an automated washing and disinfection system. The empty, washed, and disinfected containers will then be moved to a storage area for outwards dispatch to customers. The extracted sharps and other contents of the containers will be moved manually in wheeled containers into the Process 1 thermal screw disinfection units for management.

2.3.3 Process 3 - HRW Transfer Station and Office/Welfare

The proposed transfer station will be located within the 'mezzanine' area of Building 1. This will allow the Health Risk Waste fraction that cannot be processed in the treatment plant to be consolidated, stored, and repacked in preparation for onward shipment to an appropriately licensed treatment/disposal facility.

The waste will be typically solid in nature and packaged in purpose-made containers United Nations-Approved containers up to 60 litres in capacity with standard purple lids and black lids.

- Purple lid rigid containers comprise healthcare waste contaminated with cytotoxic/cytostatic medicines, chemicals, or pharmaceuticals.
- Black lid rigid containers comprise materials such as un-autoclaved Category B cultures, materials contaminated with blood or blood components, contaminated large metal objects (which cannot be shredded and where no other suitable form of recovery is available).

No onsite treatment processes are proposed for these materials – simply ambient temperature storage and repacking. Storage will be conducted to 48-60 hours at the upper level of the 'mezzanine' area. These will be stored and bulked up (collecting small volumes of waste and storing them until a large enough volume is accumulated to make the shipping offsite more cost-effective). Following bulking up, the Health Risk Waste will be transported offsite for management by recovery processes.

3 METHODOLOGY

3.1 Appropriate Assessment Guidance

EU and national guidance exist in relation to Member States' fulfilling their requirements under the EU Habitats Directive, with particular reference to Article 6(3) and 6(4) of that Directive. The methodology followed in relation to this AA has had regard to the following guidance:

- *Guidelines for Ecological Impact Assessment in the UK and Ireland*. Version 1.2 (Updated April 2022.) Chartered Institute of Ecology and Environmental Management (CIEEM, 2018);
- *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities*. Department of Environment, Heritage and Local Government (DoEHLG, 2010);
- *Communication from the Commission on the Precautionary Principle*. Office for Official Publications of the European Communities, Luxembourg (EC, 2000);
- *Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Articles 6(3) and (4) of the Habitats Directive 92/43/EEC*. Office for Official Publications of the European Communities, Brussels (EC, 2001);
- Nature and biodiversity cases: Ruling of the European Court of Justice (EC, 2006);
- Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC – Clarification of the concepts of: alternative solutions, imperative reasons of overriding public interest, compensatory measures, overall coherence, opinion of the Commission (EC, 2007);
- *Interpretation Manual of European Union Habitats*. Version EUR 28. European Commission (EC, 2013);
- Article 6 of the Habitats Directive: Rulings of the European Court of Justice (EC, 2014).
- *Managing Natura 2000 Sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC* (known as MN2000), Office for Official Publications of the European Communities, Luxembourg (EC, 2018);
- *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*, (Amended), Office for Official Publications of the European Communities, Luxembourg. European Commission EC (2021a);
- *Guidance document on the strict protection of animal species of Community interest under the Habitats Directive 92/43/EEC*. (Amended). European Commission, EC (2021b);
- *Ireland's Summary Report for the period 2008 – 2012* under Article 12 of the Birds Directive. National Parks and Wildlife Services. Department of Arts, Heritage and the Gaeltacht, Dublin, Ireland (NPWS, 2013);
- *The Status of EU Protected Habitats and Species in Ireland*. Volume 1: Summary Overview. Unpublished Report, National Parks & Wildlife Services. Department of Arts, Heritage and the Gaeltacht, Dublin (NPWS, 2019a).
- *The Status of EU Protected Habitats and Species in Ireland*. Volume 2: Habitat Assessments. Unpublished Report, National Parks and Wildlife Service. Department of Arts, Heritage and the Gaeltacht, Dublin (NPWS, 2019b);
- *The Status of EU Protected Habitats and Species in Ireland*. Volume 3: Species Assessments. Unpublished Report, National Parks and Wildlife Service. Department of Arts, Heritage and the Gaeltacht, Dublin (NPWS, 2019c);
- *Practice Note PN01: Appropriate Assessment Screening for Development Management*. Office of the Planning Regulator, Dublin Ireland, OPR (2021).

There have been significant changes to AA practices since both the EC (2001) and the DoEHLG guidance (2010), arising from practices and rulings in European, UK and Irish courts. These changes have been considered in the preparation of this report.

- When considering whether a European site can be screened out, the competent authority cannot take into account any measures intended to avoid or reduce the harmful effects of the facility (i.e. mitigation measures); however, a 2019 Irish High Court consideration concluded that Sustainable Drainage

Systems (SuDS) are 'as a matter of fact and law… not mitigation measures which a competent authority is precluded from considering at the stage 1 screening stage';

- The screening must consider the cumulative impacts of any development: that already exists; for which a planning application has been made; which the applicant for permission intends to make an application in the future; and which is a matter of public record, and which is planned to be implemented in the future;
- Consideration of the cumulative effects of plans, including local area plans;
- Where an element of the Proposed Development is missing design detail or subsequent agreements, the assessment should assume the worst-case scenario (i.e., the design with the greatest environmental impact); and
- Making of findings explicit.

3.2 Desk Study

A desk study was carried out to identify all relevant European sites and their associated QI in proximity to the facility, by reviewing available literature and online ecological databases. Results were supplemented by citizen science biodiversity records in order to assess the potential for the QI and SCI of European sites to occur within the Zone of Influence (ZoI) of the project, given their ecological requirements identified by Balmer *et al*. (2013) for SCIs, and the NPWS for QIs (NPWS, 2019, Volumes 1, 2 &3).

A number of datasets were consulted in order to identify any relevant SPAs/SACs in the area surrounding the facility. A list of rare, protected, and invasive species within 5km of the facility was generated from NBDC records, which were reviewed to identify historical records of species listed as QI or SCI for European sites within the ZoI. Desktop studies had particular regard for the following sources:

- Information on the location, nature, and design of the proposed project;
- Environmental Protection Agency (EPA) online interactive mapping tools (https://gis.epa.ie/EPAMaps) and (https://www.catchments.ie/maps/) for water quality data including surface and ground water quality status, and river catchment boundaries. EPA AA tool was used to determine the flow direction of watercourses into nearby protected sites in order to identify potential pathways for significant effects;
- BirdWatch Ireland (https://birdwatchireland.ie/)
- Mapping of European Site boundaries and Conservation Objectives for relevant sites, available online from the NPWS included site synopsis, Natura 2000 Data form and Conservation Objective Supporting Documents where available (https://www.npws.ie/protected-sites);
- Distribution records for QI and SCI species of European sites held online by the National Biodiversity Data Centre (NBDC) www.biodiversityireland.ie;
- Geohive online Environmental Sensitivity Mapping tool (https://airomaps.geohive.ie/ESM/);
- Geological Survey Ireland (GSI) (https://www.gsi.ie/en-ie/Pages/default.aspx);
- Any local surveys of flora, fauna, and habitat available using the Heritage Councils mapping website (https://heritagemaps.ie/WebApps/HeritageMaps/index.html)
- Ordnance Survey of Ireland – Mapping and Aerial photography www.osi.ie.

3.2.1 Limitations

Sources of desk study information are neither exhaustive nor necessarily easily available, and a reasoned effort was made to obtain ecological data in the public domain to inform the description of the receiving environment and its assessment. Additional information, not in the public domain, is likely to exist. This limitation is acknowledged and incorporated into the assessment and is deemed to not affect the certainty or predictability of the assessment.

3.2.2 Zone of Influence

The identification of relevant European sites to be included in this report was based on the identification of the ZoI of the Proposed Development, a source-pathway-receptor model of effects, and the likely significance of any identified effects. A buffer of 15km is typically taken as the initial ZoI extending beyond the reach of the footprint of a plan or project, as per Ministerial guidance (DEHLG, 2010) on AA:

'*For projects, the distance could be much less than 15 km, and in some cases less than 100m, but this must be evaluated on a case-by-case basis with reference to the nature, size and location of the project, and the sensitivities of the ecological receptors, and the potential for in combination effects*' (DoEHLG, 2010; p.32, para 1).

Although there may be scientifically appropriate reasons for extending or reducing this ZoI depending on the pathway of potential impacts. With regard to the current proposal, an initial distance of 15km distance was considered followed by a review of hydrological connectivity between the Proposed Development and European sites to consider any additional European sites. This distance was considered more than sufficient given the scale, location, and nature of the project.

3.2.3 Source-Pathway-Receptor Model

The likely effects of the Proposed Development on any European site from the ZoI has been assessed using a source-pathway-receptor model, where:

- A 'source' is defined as the individual element of the proposed works that has the potential to impact on a European site, its qualifying features, and its conservation objectives;
- A 'pathway' is defined as the means or route by which a source can affect the ecological receptor; and
- A 'receptor' is defined as the SCI of SPAs or QI of SACs for which conservation objectives have been set for the European site(s) being screened.

A source-pathway-receptor model is a standard tool used in environmental assessment. In order for an effect to be likely, all three elements of this mechanism must be in place. The absence or removal of one of the elements of the mechanism results in no likelihood for the effect to occur. The source-pathway-receptor model was used to identify a list of European sites, and their QIs/SCIs, with potentially links to European site. These are termed as 'relevant' European sites/QIs/SCIs throughout this report.

3.2.4 Likely Significant Effect

The threshold for a Likely Significant Effect (LSE) is treated in the screening exercise as being above a de minimis level[1]. The opinion of the Advocate General in CJEU case C-258/11 outlines:

'*the requirement that the effect in question be 'significant' exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable effect on a European site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill.*'

In this report, therefore, 'relevant' European sites are those within the potential ZoI of activities associated with the operation of the Proposed Development, where LSE pathways to European sites were identified through the source-pathway-receptor model.

3.2.5 Screening Process

The Screening for AA will incorporate the following steps:

[1] *Sweetman v. An Bord Pleanála* (Court of Justice of the EU, case C-285/11). A de minimis effect is a level of risk that is too small to be concerned with when considering ecological requirements of an Annex I habitat or a population of Annex II species present on a European site necessary to ensure their favourable conservation condition. If low level effects on habitats or individuals of species are judged to be in this order of magnitude and that judgment has been made in the absence of reasonable scientific doubt, then those effects are not considered to be likely significant effects.

1. Determining whether a project or plan is directly connected with or necessary to the conservation management of any European sites;
2. Describing the project or plan;
3. Identifying the European sites potentially affected by the project or plan;
4. Identifying and describing any potential effects of the project or plan on European sites, alone, in-combination and cumulatively with other plans/projects; and
5. Assessing the likelihood of significant effects on European sites.

3.3 Field Study

In order to inform the assessment, a site visit was conducted by an RPS ecologist which comprised a general ecological walkover of the site and the stream along the northern boundary of the site. The field study was undertaken using professional interpretation and the application of relevant guidance, systems and methods including the following:

- Habitat classification to Fossitt (2000);
- Assessment of potential for QI species, including those listed in FPO and Red Lists (Wyse Jackson *et al.*, 2016; Lockhart *et al.*, 2012)*;*
- Identification of Third Schedule Species of European Communities (Birds and Natural Habitats) Regulations 2011 (as amended)); and
- Assessment for evidence, field signs or suitable *ex-situ* habitats for SCI birds and QI mammals (e.g. European otter *Lutra lutra*).

4 RECEIVING ENVIRONMENT

4.1.1 Habitats and Flora

Key habitats and species were identified and registered through a desk study and site visit. The land use in the vicinity of the Proposed Development is '*Artificial Surfaces - Industrial, commercial and transport units - Industrial and commercial units'*; which is typically a habitat of negligible ecological value. No QI or SCI species were recorded during the site visit. The site visit confirmed that the site of the Proposed Development does not provide any habitats of significant supporting value for any QI or SCI, or provide any *ex-situ* function to European sites.

4.1.1.1 Qualifying Interests

The desk study returned no records for any QI mammal species from the preceding 10 years, within 5 km of the Proposed Development site. There are no habitats offering significant breeding or foraging sites for any QI species within the footprint of the Proposed Development.

Freshwater white-clawed crayfish *Austropotamobius pallipes* were recorded *c*. 3 km south and *c*. 3.5 km east in the Camac river which is *c*. 2 km east of the facility at its closest point. The river Griffeen runs within 300 m of the Proposed Development. The river Griffeen merges with the river Liffey *c.* 10.5 km downstream. The Liffey then runs a further *c.* 14 km downstream where the river Camac merges. It is a further *c.* 12.5 km back upstream to where the crayfish record was reported. This is a total hydrological distance of *c.* 37 km. The closest European site designated for freshwater white-clawed crayfish is the River Barrow and River Nore SAC [002162] which is c. 43 km southwest of the facility site and is hydrologically separated from the Proposed Development.

Table 4-1: Qualifying Interest Species Returned from NBDC Data Search

Common Name *Scientific Name*	Record count	Date of last record	Habitat Preferences[2]
Freshwater White-clawed Crayfish *Austropotamobius pallipes*	**7**	18/08/2013	Rivers, streams, and lakes in Ireland particularly in those with a calcareous influence, with good quality, cool water of pH above 7 and calcium levels of minimum 5mg/l, but can tolerate some variation.

4.1.1.2 Special Conservation Interests

The desk study returned records for eight SCI bird species from the preceding 10 years within 5 km of the facility (see **Table 4-2**). There is no significant nesting or foraging sites for any SCI species recorded in the desk study or for any SCI species of the European sites within the ZoI or footprint of the Proposed Development.

Table 4-2: Special Conservation Interest Birds Returned from NBDC Data Search

Common Name *Scientific Name*	Record count	Date of last record
Black-headed Gull *Larus ridibundus*	22	13/01/2017
Common Coot *Fulica atra*	32	13/01/2018
Grey Heron *Ardea cinerea*	39	23/10/2016
Little Grebe *Tachybaptus ruficollis*	25	20/09/2016
Mallard *Anas platyrhynchos*	58	09/02/2017
Merlin *Falco columbarius*	4	09/03/2014
Peregrine Falcon *Falco peregrinus*	8	16/09/2017
Tufted Duck *Aythya fuligula*	20	09/06/2016

[2] Available online at https://species.biodiversityireland.ie/ Accessed June 2022.

4.1.1.3 Invasive Alien Plants and Animals

During the site visit, four invasive plant species were identified within the hedgerow surrounding the facility, namely Himalayan honeysuckle *Leycesteria formosa*, sycamore *Acer pseudoplatanus*, cherry laurel *Prunus laurocerasus* and butterfly-bush *Buddleja davidii*. However, none of these species are listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended, non-native species subject to restrictions under *Regulations 49 and 50*). For the purposes of this assessment, only species listed on the Third Schedule have been considered in the report owing to the legislative requirement to prevent their spread.

Seven invasive alien plants, scheduled to the European Communities (Bird and Natural Habitat Regulations) 2011 as amended, were returned from the data search parameters (**Fringed Waterlily** *Nymphoides peltata* which inhabits inland surface waters2, was recorded in 2016 in Brownsbarn South Ponds Citywest, *c*. 3.5km southeast of the facility. Giant Hogweed *Heracleum mantegazzianum*, inhabits mires, bogs, and fens; grasslands and landscapes dominated by forbs, mosses or lichens; woodland, forest and other wooded land; constructed, industrial or other artificial habitats; regularly or recently cultivated agricultural, horticultural or domestic habitat2, was recorded in 2021 in Citywest *c*. 1km from the facility. Indian Balsam *Impatiens glandulifera,* inhabits mires, bogs, and fens; heath, scrubland & tundra; woodland, forest, and other wooded land; regularly or recently cultivated agricultural, horticultural, or domestic habitat2 was recorded in 2021 in Corkagh Desmesne *c*. 4km northeast of the Proposed Development site. Japanese Knotweed *Fallopia japonica,* inhabits mires, bogs, and fens; heath, scrubland, and tundra; woodland, forest and other wooded land; regularly or recently cultivated agricultural, horticultural or domestic habitat; inland unvegetated or sparsely vegetated habitats; constructed, industrial or other artificial habitats; miscellaneous2, was recorded in 2019 in Bianconi Avenue, Citywest, *c*. 3km east of the facility . Nuttall's waterweed *Elodea nuttallii*, which inhabits inland surface waters and estuaries2, was recorded in 2020 at Gollierstown, Dublin *c*. 3.5km from the Proposed Development site. The waterweed was recorded within the Grand Canal, which is hydrologically separated from the facility. Spanish Bluebell *Hyacinthoides hispanica,* intentionally planted domestically in horticultural habitat e.g., gardens demesnes, parkland, churchyards, cemeteries and is known to have spread via natural and human assisted into the wild e.g., woodlands, roadsides, and waste ground, was recorded in 2016 in Corkagh Park, *c*. 4.3m northeast of the Proposed Development site. Three-cornered Garlic *Allium triquetrum,* inhabits regularly or recently cultivated agricultural, horticultural, or domestic habitat; constructed, industrial or other artificial habitats; miscellaneous2, was recorded in 2021 in Corkagh Desmesne *c*. 4.5km northeast of the Proposed Development site. All species are deemed to be outside of the ZoI of the Proposed Development.

Three invasive alien animal species, scheduled to the European Communities (Bird and Natural Habitat Regulations) **2011-2015, was** returned from the data search (Table 4-3): **American** Mink Mustela vison was *recorded c*. 4.9km *northwest* of the Proposed Development at Celbridge. Brown Rat Rattus norvegicus was recorded *c.* 4.5 km *east* of the facility at Kingswood, Clondalkin. These species are deemed outside of the ZoI of the facility. There are 15 records of eastern grey squirrel Sciurus carolinensis within 5km *of the* facility, with the most recent record in 2017, recorded c. 4.5 km *northeast* at Corkagh Park. Through professional experience, Eastern grey squirrels are locally common throughout Dublin and surrounding counties.

Table 4-3Fringed Waterlily *Nymphoides peltata* which inhabits inland surface waters[2], was recorded in 2016 in Brownsbarn South Ponds Citywest, *c*. 3.5km southeast of the facility. Giant Hogweed *Heracleum mantegazzianum*, inhabits mires, bogs, and fens; grasslands and landscapes dominated by forbs, mosses or lichens; woodland, forest and other wooded land; constructed, industrial or other artificial habitats; regularly or recently cultivated agricultural, horticultural or domestic habitat[2], was recorded in 2021 in Citywest *c*. 1km from the facility. Indian Balsam *Impatiens glandulifera,* inhabits mires, bogs, and fens; heath, scrubland & tundra; woodland, forest, and other wooded land; regularly or recently cultivated agricultural, horticultural, or domestic habitat[2] was recorded in 2021 in Corkagh Desmesne *c*. 4km northeast of the Proposed Development site. Japanese Knotweed *Fallopia japonica,* inhabits mires, bogs, and fens; heath, scrubland, and tundra; woodland, forest and other wooded land; regularly or recently cultivated agricultural, horticultural or domestic habitat; inland unvegetated or sparsely vegetated habitats; constructed, industrial or other artificial habitats; miscellaneous[2], was recorded in 2019 in Bianconi Avenue, Citywest, *c*. 3km east of the facility . Nuttall's waterweed *Elodea nuttallii*, which inhabits inland surface waters and estuaries[2], was recorded in 2020 at Gollierstown, Dublin *c*. 3.5km from the Proposed Development site. The waterweed was recorded within the Grand Canal, which is hydrologically separated from the facility. Spanish Bluebell *Hyacinthoides hispanica,* intentionally planted domestically in horticultural habitat e.g., gardens demesnes, parkland, churchyards, cemeteries and is known to have spread via natural and human assisted into the wild

e.g., woodlands, roadsides, and waste ground[3], was recorded in 2016 in Corkagh Park, *c*. 4.3m northeast of the Proposed Development site. Three-cornered Garlic *Allium triquetrum,* inhabits regularly or recently cultivated agricultural, horticultural, or domestic habitat; constructed, industrial or other artificial habitats; miscellaneous[2], was recorded in 2021 in Corkagh Desmesne *c*. 4.5km northeast of the Proposed Development site. All species are deemed to be outside of the ZoI of the Proposed Development.

Three invasive alien animal species, scheduled to the European Communities (Bird and Natural Habitat Regulations) 2011-2015, was returned from the data search (**Table 4-3**): American Mink *Mustela vison* was recorded *c.* 4.9km northwest of the Proposed Development at Celbridge. Brown Rat *Rattus norvegicus* was recorded *c.* 4.5 km east of the facility at Kingswood, Clondalkin. These species are deemed outside of the ZoI of the facility. There are 15 records of eastern grey squirrel *Sciurus carolinensis* within 5km of the facility, with the most recent record in 2017, recorded *c*. 4.5 km northeast at Corkagh Park. Through professional experience, Eastern grey squirrels are locally common throughout Dublin and surrounding counties.

Table 4-3: Invasive alien plants and animals, scheduled to the European Communities (Bird and Natural Habitat Regulations) 2011-2015, recorded in the desk study.

Common Name *Scientific Name*	Record count	Date of last record
Flora		
Fringed Waterlily *Nymphoides peltata*	2	15/06/2016
Giant Hogweed *Heracleum mantegazzianum*	4	22/06/2021
Indian Balsam *Impatiens glandulifera*	5	24/08/2021
Japanese Knotweed *Fallopia japonica*	4	11/09/2019
Nuttall's Waterweed *Elodea nuttallii*	2	18/07/2020
Spanish Bluebell *Hyacinthoides hispanica*	1	07/05/2016
Three-cornered *Garlic Allium triquetrum*	2	01/05/2021
Fauna		
American Mink *Mustela vison*	5	15/04/2019
Brown Rat *Rattus norvegicus*	3	09/10/2015
Eastern Grey Squirrel *Sciurus carolinensis*	15	31/12/2017

Note 1: None of these invasive alien species were recorded on the site of the Proposed Development. All records are deemed to be outside of the ZoI of the Enva facility.

4.1.2 Waterbodies

Under the *River Basin Management Plan for Ireland* (2018-2021), the Proposed Development at Greenogue Business Park located within the Liffey and Dublin Bay catchment (Code: 09) and Liffey_SC_090 sub-catchment of the Eastern River Basin District. The business park is intersected by the Griffeen River (River Waterbody Code IE_EA_09L012100 (LIFFEY_170), EPA Code 09G01), which flows north of the site. This river is culverted beneath the Grand Canal and reaches the river Liffey approximately 7 km downstream at Lucan Village. The waterbody is classified as having 'poor' status and deemed to be 'at risk' in the 2016-2021 WFD monitoring period.

4.1.3 Surface water / Stormwater

The Proposed Development site is covered by hardstanding. Surface water drainage on site is managed by being first passed through a settlement tank which allows heavier stones and debris to 'settle' in the tank before being passed through a hydrocarbon interceptor. The hydrocarbon interceptor is used to capture any floating oil or fuel and retain it so that only oil-cleaned surface water is released through the discharge point (SW3) to the Griffeen River to the north. The discharge point (SW3) is visually inspected daily, and this water is also tested for a range of pollutants as specified in the site's licence. Where issues are identified, the

[3] Available online at http://nonnativespecies.ie/wp-content/uploads/2014/03/Hyacinthoides-hispanica-Spanish-Bluebell-and-Hybrid.pdf Accessed July 2022

facility has the capability to shut off the discharge to the surface water (i.e. Griffeen River), via open/close valves.

Stormwater from the site is released into the municipal stormwater network within the business park and ultimately to the Griffeen River.

4.1.4 Wastewater

Wastewater is only discharged to the sewer following confirmation that the discharge has met the requirements of the site's EPA licence. Treated trade effluent (produced from the facility's activities/ processes) and domestic effluent (i.e. sanitary wastewater) are discharged to the County Council sewer line where it mixes with other trade and domestic effluent before being processed at the County Council's wastewater treatment plant.

4.1.5 Groundwater

The site overlies the Dublin (IE_EA_G_008) groundwater body. This groundwater body is classified as having 'good' status in the 2016-2021 WFD monitoring period and discharges directly into the Dublin Bay (IE_EA_090_0000) coastal water body.

Groundwater is monitored on-site via three groundwater monitoring wells. These are monitored as per the site's EPA licence and on occasion by the EPA) during the year. Groundwater pollutants have been identified, with the source unclear, but believed to be historic. Several programmes have been initiated by Enva to identify the cause and to determine if levels recorded are as a result of a recent or historic activity, or are migrating onto the site from somewhere else. These studies are still ongoing. In 2020, additional groundwater monitoring wells were drilled on and off site in an effort to better understand the groundwater quality. Based on data collated it appears that the issues are a result of historic site activities where contaminants have remained in the soil and groundwater and are still persisting a number of years later. Monitoring results are showing that contaminant levels are continuing to decrease over time.

Contaminated soils have been stored in the warehouse proposed to house the HRW processing plant for more than 15 years. There has been no processing of the soils in the warehouse; it is a storage operation only. The floor of the warehouse is comprised of a 300 ml concrete/steel mix. The warehouse is also fully bunded, with a 'physical lip' bund to allow for the holding of any leachate that may be produced during the storage process. The warehouse floor is regularly inspected and any sitting leachate on the warehouse floor removed by a vacuum tanker. There has been no groundwater contamination attributed to the soil storage process. In the event of the HRW waste being located in this warehouse, the whole building would be washed down and inspected. Any minor repairs will be undertaken, and groundwater monitoring continued in line with the current regime.

4.1.6 Existing Air Environment

The site lies with Air Quality Zone A: Dublin Conurbation. The site is situated within the Dublin City (Region 1) region of the EPA Air Quality Index for Health (AQIH). Overall, existing baseline levels of pollutants based on the data for EPA Zone A are generally below ambient air quality limit values and by extension the levels in the vicinity of the Proposed Development may also be considered to be below the limit values. In summary, from the data available, it can be concluded that the Rathcoole area experiences 'Good' air quality. Currently there are three air monitoring points are associated with a metal drum painting process and a drum washing process. Recent monitoring as per 2020 are indicated 100% compliance with licence requirements.

Formal monitoring malodorous emissions is not required as part of the existing licence; however, odour management is required as part of the environmental management programme, and this is carried out as part of a weekly check on the site.

4.1.7 Existing Noise Environment

The noise climate in the area is dominated by road traffic from the N7 to the south and the M50 to the east west as well as the supporting regional and local roads. Airport noise from Casement Aerodrome to the east is also present, noise mapping illustrates that although it is a source of noise in the vicinity, it is not a predominant / continuous source. There are no noise sensitive locations (NSLs) in proximity to the facility.

The facility is located in the heart of an industrial estate and is authorised to but does not frequently operate during night-time hours. Existing and future site operations do not give rise to tones or impulses at offsite NSLs, and noise levels have remained / and will remain compliant with license requirements.

4.1.8 Waste

The existing licence requires the applicant to manage the waste generated and accepted at the facility in a manner that does not cause environmental pollution.

Volumes of waste at the Proposed Development site will increase and decrease due to external business sector activities (i.e., other businesses increase or decrease their volumes of waste that they generate for disposal). Hazardous and non-hazardous waste generated onsite is managed, stored, and recorded in accordance with the existing licence (W0192-03) requirements.

It is ensured that this waste is subsequently treated or disposed of in accordance with the relevant waste regulations. Waste Volumes are reported annually as part of the Annual Environmental Return (AER)/Environmental Performance Reporting (EPR) requirements in accordance with the existing licence (W0192-03) requirements.

4.2 Relevant European Sites

With regard to the current proposal, an initial distance of 15 km distance was considered followed by a review of hydrological connectivity between the Proposed Development and European sites to consider any additional European sites. The following sites SACs and SPAs were identified within the 15km buffer:

- Rye Water Valley / Carton (SAC);
- Wicklow Mountains (SAC and SPA);
- Red Bog (SAC);
- Glenasmole Valley (SAC); and
- Poulaphuca Reservoir (SPA).

These six European Sites and associated QIs/SCIs are listed in **Table 4.1.** The spatial boundary data for the European sites is shown in **Figure 4.1** and was the most recent available online from NPWS. Full details of the COs are available from the NPWS website. Of the sites identified, none have been brought forward for further assessment. All relevant European sites identified in this report are illustrated in **Figure 4.1**.

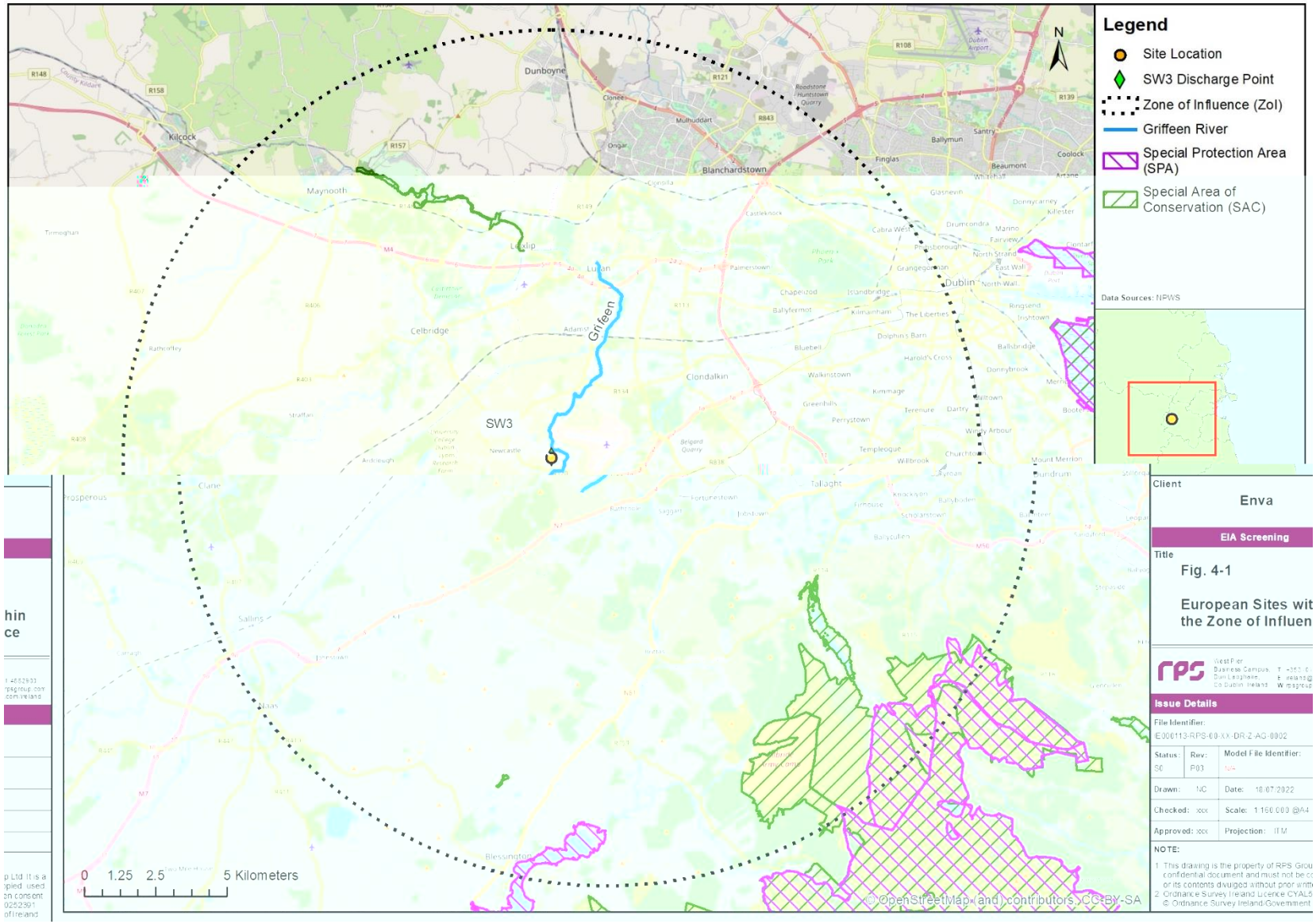

Figure 4-1: European Sites within 15 km of the Facility.

Table 4-4: European Sites within 15 km of the Proposed Development at Greenogue Business Park, County Dublin

Site	Distance (approximate distance km to closest point)	Qualifying Interests (*Priority Habitat)/ Special Conservation interests	Conservation Objective(s)	Site Scoped in for Further Assessment
		Special Area of Conservation (SAC)		
Rye Water Valley / Carton SAC (001398) CO's- Specific Version 1.0 [22/12/21] (NPWS, 2021a)	c.7 km	• [7220] Petrifying Springs with tufa formation (Cratoneurion)* • [1014] Narrow-mouthed Whorl Snail (*Vertigo angustior*) • [1016] Desmoulin's Whorl Snail (*Vertigo moulinsiana*)	To maintain or restore the favourable conservation condition of habitats and species.	**No** - rationale for scoping out is set out in subsequent sections.
Wicklow Mountains SAC (002122) CO's- Specific Version 1.0 [31/07/17] (NPWS, 2017)	c.9 km	• [3110] Oligotrophic waters containing very few minerals of sandy plains (*Littorelletalia uniflorae*) • [3160] Natural dystrophic lakes and ponds • [4010] Northern Atlantic wet heaths with *Erica tetralix* • [4030] European dry heaths • [4060] Alpine and Boreal heaths • [6130] Calaminarian grasslands of the *Violetalia calaminariae* • [6230] Species-rich *Nardus* grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) • [7130] Blanket bogs (* if active bog) • [8110] Siliceous scree of the montane to snow levels (*Androsacetalia alpinae* and *Galeopsietalia ladani*) • [8210] Calcareous rocky slopes with chasmophytic vegetation • [8220] Siliceous rocky slopes with chasmophytic vegetation • [91A0] Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles • [1355] Otter (*Lutra lutra*)	To maintain or restore the favourable conservation condition of habitats and species.	**No** - rationale for scoping out is set out in subsequent sections.
Red Bog, Kildare SAC (000397) CO's- Specific Version 1.0 [17/07/19] (NPWS, 2019d)	c.11.9 km	• [7140] Transition mires and quaking bogs	To maintain or restore the favourable conservation condition of habitats and species.	**No** - rationale for scoping out is set out in subsequent sections.

APPROPRIATE ASSESSMENT SCREENING

Site	Distance (approximate distance km to closest point)	Qualifying Interests (*Priority Habitat)/ Special Conservation interests	Conservation Objective(s)	Site Scoped in for Further Assessment
Glenasmole Valley SAC (001209) CO's- Specific Version 1.0 [10/12/21] (NPWS, 2021b)	c.8.5 km	• [6210] Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco Brometalia) (* important orchid sites)* • [6410] *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) • [7220] Petrifying Springs with tufa formation (Cratoneurion)*	To maintain or restore the favourable conservation condition of habitats and species.	**No** - rationale for scoping out is set out in subsequent sections.
		Special Protection Area (SPA)		
Poulaphuca Reservoir SPA (004063) CO's- Generic 9.0 [26/01/22] (NPWS, 2022a)	c.13 km	• [A043] Greylag Goose (*Anser anser*) • [A183] Lesser Black-backed Gull (*Larus fuscus*)	To maintain or restore the favourable conservation condition of the bird species listed.	**No** - rationale for scoping out is set out in subsequent sections.
Wicklow Mountains SPA (004040) CO's- Generic 9.0 [26/01/22] (NPWS, 2022b)	c.13 km	• [A098] Merlin (*Falco columbarius*) • [A103] Peregrine (*Falco peregrinus*)	To maintain or restore the favourable conservation condition of the bird species listed.	**No** - rationale for scoping out is set out in subsequent sections.

4.3 Assessment of Likely Significant Effects

The screening assessment has followed the guidelines outlined in the Methodology (**Section 3**) and adopts a comprehensive and precautionary approach for which the starting point is a complete list of all QIs/SCIs of European sites identified within the prescribed ZoI (15 km). In this context, this assesses a specific source-pathway-receptor model for the potential pathways and impacts from the Proposed Development.

The Proposed Development is not linked to or form part of the management of any European Site.

4.3.1 Scoping of Effects

In terms of potential for direct impacts as a result of the Proposed Development, the site is not located within or directly adjacent to any designated European Site. The proposed changes to current activities and materials accepted at the Enva facility are not predicted to give rise to any direct loss, deterioration, fragmentation or disturbance of Annex. I habitats or Annex. II species (or their supporting habitats), which may be listed as QIs of European Sites noted in the earlier section. Therefore, only potential for indirect effects are considered below.

4.3.1.1 Noise, Vibration, Lighting and Human Presence

Internal noise sources consist of equipment, plant, heating, and ventilation. Noise and vibration may be generated from excavations, earthworks, machinery, vehicles and personnel during construction and decommissioning. The primary external noise sources during all phases of the Proposed Development are from vehicles operating at the facility. The changes proposed at the facility are not predicted to result in significant change in terms of in terms of noise, vibration, lighting, and human presence. The existing operations and proposed operations will be situated within an already busy industrial estate. Due to the degree of separation from European Sites, noise sensitive QIs are significantly removed so that no significant effects are likely to occur. Therefore, these effects are not predicted to result in any LSEs and are therefore scoped out from further assessment.

4.3.1.2 Surface Water Run-off

Pollution to water during all phases of the Proposed Development could result from direct effects such as surface water run-off carrying suspended silt or contaminants into local watercourses, such as under high rainfall events when the capacity of the current mitigation may be exceeded. However, given the scale and nature of the Proposed Development, the hydrological distance between the Proposed Development and any downstream European site(s) (i.e. all greater than 18 km from the site), and the dispersive nature of open coastal waters, no significant effects on European sites are likely to occur via surface water run-off. The development/activity is unlikely to result in fugitive emissions to water during operation and no reconfiguration of water management onsite is required to mitigate any potential impacts to waterbodies. As such, the effects are not predicted to result in any LSEs and these have therefore been scoped out from further assessment.

4.3.1.3 Changes of Groundwater Quality, Yield and/or Flow Paths

Accidental spillages of fuels, chemicals or other contaminants during construction and decommissioning can result in localised contamination of soils and groundwater underlying the site if materials are not stored and used in an environmentally safe manner. Should any localised accidental spillages of fuel, oil or chemicals occur on site, it is expected that the natural subsoil would provide adequate attenuation and filtration before reaching the groundwater. Furthermore, given the distance between the Proposed Development and any European site(s) (i.e. all greater than 7 km from the site), no significant effects on European sites are likely to occur via groundwater pathways. The site is covered by hardstanding and there will be no direct emissions to ground from operational activities at the Proposed Development site. As such, the effects of the Proposed Development are not predicted to impact groundwater quality, yield and/or flow paths or result in any LSEs and these have therefore, scoped out from further assessment.

4.3.1.4 Emissions to Air

The effects of changes to air with proposed changes sought under these consent applications will be assessed using an air dispersion model, which is also presented as part of the EIA Screening Report.

The EPA licence requires that any air emissions from the Proposed Development do not cause air pollution or create an odour nuisance. It is unlikely that the emissions will result in any LSEs due to dispersion and the proximity to the European sites.

There are no European Sites located within the ZoI of the Proposed Development and hence these effects are not predicted to result in any LSEs and have therefore been scoped out from further assessment.

4.3.2 Key Findings

The key findings of this AA Screening Report are that the Proposed Development is not predicted to result in any LSE alone on any European Site(s) within the ZoI of the Proposed Development. Consideration of in-combination effects is set out below.

4.4 In-Combination Effects

Legislation, guidance, and case law requires that in-combination effects with other plans or projects are considered.

A search was conducted of planning applications (projects) within the vicinity of the Proposed Development, using the South Dublin County Council planning portal map viewer[4] and the Department of Housing, Planning and Local Government EIA portal map viewer[5]. The search was limited to the five-year period preceding the date of issue of this report and excluded retention applications (i.e., typically local-scale residential or commercial developments where an impact has already occurred), withdrawn and refused applications. No relevant in-combination LSEs were identified from these projects.

A search of the An Bord Pleanála website[6] was completed to identify any relevant applications, including Strategic Infrastructure Development (SID) and Strategic Housing Development (SHD) in the past three years, or in close proximity to the Proposed Development. No relevant in-combination LSEs were identified from these projects.

Due to the scale and nature of the Proposed Development it is not predicted that there is potential for other plans and projects to have an effect, either alone or in-combination, with the Proposed Development.

Due to the degree of separation and no direct/clear pathways between the Proposed Development site and the identified European Sites, no significant in-combination effects are predicted any European Site identified.

[4] Available online at https://sdublincoco.maps.arcgis.com/apps/webappviewer/. Accessed May 2022.

[5] Available online at http://housinggovie.maps.arcgis.com/apps/webappviewer. Accessed May 2022.

[6] Available online at http://www.pleanala.ie/. Accessed May 2022.

5 CONCLUSION

RPS has prepared this report to inform Screening for AA to consider whether the Proposed Development, individually or in combination with other plans or projects, and in view of best scientific knowledge, are likely to have a significant effect on any European site(s).

The screening exercise was completed in compliance with the relevant European Commission guidance, national guidance, and case law. The potential impacts of the Proposed Development have been considered in the context of the European sites potentially affected, their QIs or SCIs, and their conservation objectives.

Through an assessment of the source-pathway-receptor model, which considered the ZoI of effects from the Proposed Development (as sought under these consent applications) and the potential in-combination effects with other plans or projects, the following findings were reported:

- The Proposed Development is not directly connected with or necessary to the management of any European site;
- The Proposed Development alone is not predicted to result in any Likely Significant Effects on any European site(s) within the ZoI of the facility.
- The Proposed Development will not give rise to potential in-combination or cumulative effects with the other projects considered.

Having regard to the methodology employed and the findings of the screening stage appraisal, it has been concluded that a Stage 2 (Natura Impact Statement), to consider the adverse effects of the Proposed Development, is not required.

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