OFFICE OF ENVIRONMENTAL SUSTAINABILITY

INSPECTORS REPORT ON A WASTE WATER DISCHARGE LICENCE APPLICATION

To: Board of Directors
From: Deirdre French, Environmental Licensing Programme
Date: 30/04/2018
RE: Application for a Waste Water Discharge Licence from Irish Water, for the agglomeration named Wexford Town, Reg. No. D0030-02.

<table>
<thead>
<tr>
<th>Application &amp; Agglomeration Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agglomeration Name:</td>
</tr>
<tr>
<td>County:</td>
</tr>
<tr>
<td>Schedule of discharge licensed:</td>
</tr>
<tr>
<td>Licence application received:</td>
</tr>
<tr>
<td>Notices under Regulation 18(3)(b)¹ issued:</td>
</tr>
<tr>
<td>Information under Regulation 18(3)(b) received:</td>
</tr>
<tr>
<td>Unsolicited Information received:</td>
</tr>
<tr>
<td>Site Visit:</td>
</tr>
<tr>
<td>Submission(s) Received:</td>
</tr>
<tr>
<td>Design Population Equivalent:</td>
</tr>
<tr>
<td>Actual Population Equivalent (p.e.):</td>
</tr>
<tr>
<td>Type of treatment:</td>
</tr>
<tr>
<td>Wastewater treatment plant (WWTP) description:</td>
</tr>
</tbody>
</table>

¹ Waste Water Discharge (Authorisation) Regulations 2007 as amended.
1. Review Application

Wexford County Council was granted a Waste Water Discharge Licence (WWDL) D0030-01, dated 19/11/2009, in respect of the agglomeration named Wexford Town and Environs. An application for a review of WWDL D0030-01 was received on 31/03/2017 by the Agency from Irish Water to amend the agglomeration boundary previously authorised by D0030-01. In recent years, the network served by the wastewater treatment plant (WWTP), located in Strandfield, has been extended to include the Taghmon (D0389-01), Piercestown (D0406-01) and Castlebridge agglomerations. The network was also extended to serve developments along the rising main routes which include Larkin’s Cross, Ballyhine (A0260-01) (including Holmestown Landfill Waste Licence Reg. No. W0191-02), Barntown, the Heritage Park and Crosstown Ferrybank. Furthermore, the application includes a proposal to extend the network further to include part of the village of Murntown (A0269-02). This proposal includes the construction of a new pumping station and the decommissioning of the Murntown WWTP.

In 2007, when the first licence application for Wexford Town D0030-01 was received by the Agency, the agglomeration p.e. was 17,000 which has since increased to the current p.e. of 28,110.

The Castlebridge agglomeration is currently one of the agglomerations subject to infringement proceedings in the European Court of Justice (ECJ Case C-427/17) for failing to meet the requirements of the Urban Waste Water Treatment Directive 91/271/EEC.

2. Discharges to waters

The following table outlines the main considerations in relation to discharges to waters from this agglomeration.

Table 1: Discharges to waters

<table>
<thead>
<tr>
<th>Primary discharge point</th>
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</thead>
<tbody>
<tr>
<td>Receiving water name</td>
<td>Lower Slaney Estuary (referred to in application as Wexford Harbour)</td>
</tr>
<tr>
<td>Type of receiving water</td>
<td>Transitional</td>
</tr>
<tr>
<td>Normal flow</td>
<td>6,291 m³/day</td>
</tr>
<tr>
<td>Maximum flow</td>
<td>19,344 m³/day</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Secondary discharge point(s)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Receiving water name</td>
<td>Murntown_Upper IE_SE_12A020300 (current WFD Waterbody Code) which drains to the Assaly_010, referred to in application as Piercetown – IE_SE_12_316</td>
</tr>
<tr>
<td>Type of receiving water(s)</td>
<td>Freshwater</td>
</tr>
<tr>
<td>Normal flow</td>
<td>91.35 m³/day</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Storm water overflow(s)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Storm water overflow(s)</td>
<td>Yes -12</td>
</tr>
<tr>
<td>Receiving water name(s)</td>
<td>Receiving waters as listed in Schedule A.3 of the RL</td>
</tr>
</tbody>
</table>
3. Environmental Impact Assessment Considerations

3.1 EIA Screening

I have considered the requirements of Regulation 3(1) of the Waste Water Discharge (Authorisation) (Environmental Impact Assessment) Regulations 2016 and have determined that the Agency is not required to carry out screening for Environmental Impact Assessment (EIA) for this application due to the application not being an Agency initiated review and given that there is development associated with the discharge.

It is noted that the applicant has submitted an EIS with the licence application in accordance with Regulation 17 of the Waste Water Discharge (Authorisation) Regulations 2007 as amended. In accordance with Regulation 22 of these Regulations, I have had regard to the matters mentioned in the environmental impact statement in respect of the development and in the decision of An Bord Pleanála in so far as they relate to the risk of environmental pollution of the receiving waters from the waste water discharge concerned.

3.2 Content of EIS and licence application

I have considered and examined the content of the licence application, the EIS and other relevant material submitted with it.

4. Impact of waste water discharges

The following table summarises the main considerations in relation to the Lower Slaney Estuary downstream of the primary discharge.

Table 2: Receiving waters

<table>
<thead>
<tr>
<th>Characteristic</th>
<th>Classification</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Receiving water name</td>
<td>Primary Discharge Lower Slaney Estuary</td>
<td>WFD Code: IE_SE_040_0200</td>
</tr>
<tr>
<td></td>
<td>Secondary Discharge Murntown_Upper</td>
<td>WFD Code: IE_SE_12A020300</td>
</tr>
<tr>
<td>Designations</td>
<td>Slaney River Valley SAC</td>
<td>Site code: 000781</td>
</tr>
<tr>
<td></td>
<td>Wexford Harbour and Slobs SPA</td>
<td>Site code: 004076</td>
</tr>
<tr>
<td></td>
<td>Nutrient Sensitive Waters</td>
<td>Slaney Estuary Lower and Wexford Harbour</td>
</tr>
<tr>
<td></td>
<td>Shellfish Waters</td>
<td>Wexford Harbour Outer and Inner shellfish areas</td>
</tr>
<tr>
<td>Receiving water monitoring stations</td>
<td>Primary Discharge SY205 – Estuary: u/s Ferrycarrig Bridge, NW Wexford Br (EPA Code: TW33002085SY2003)</td>
<td>Approx. 6 km u/s of SW001 on the Lower Slaney Estuary</td>
</tr>
<tr>
<td></td>
<td>SY410 – Buoy 21 (EPA Code: TW33002085SY2014)</td>
<td>Approx. 1.2 km d/s of SW001 in Wexford Harbour</td>
</tr>
<tr>
<td></td>
<td>Secondary Discharge Upstream UWW RS12M660180</td>
<td>Approx 35 m u/s of SW002 on Murntown Upper Stream</td>
</tr>
<tr>
<td>Biological quality rating (Q value)</td>
<td>Downstream UWW RS12M660720</td>
<td>Approx 65 m d/s of SW002 on Murntown Upper Stream</td>
</tr>
<tr>
<td>-----------------------------------</td>
<td>-----------------------------</td>
<td>-------------------------------------------------</td>
</tr>
<tr>
<td>Lower Slaney Estuary</td>
<td>For 2010-2012 reporting period</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>WFD status</th>
<th>Assaly_010 (downstream of Murntown Upper Stream)</th>
<th>Restore 2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lower Slaney Estuary</td>
<td>Q3 Poor</td>
<td>Good status by 2021</td>
</tr>
</tbody>
</table>

**Primary Discharge Point**

The South Eastern RBD Transitional and Coastal Waters Action Programme lists Wexford Harbour as a waterbody “at risk” or “probably at risk” from land based point source pressures.

In the *European Communities Environmental Objectives (Surface Waters) Regulations 2009 as amended*, the key water parameters for the protection of transitional waters are BOD and phosphorus. In accordance with these Regulations, the standard for good status of BOD in transitional waters is 4.0 mg/l, and the standard for orthophosphate in transitional waters (at salinity of 27 psu) is ≤0.049 mg/l.

The Slaney Estuary Lower and Wexford Harbour are listed to be Nutrient Sensitive Areas under the *Urban Waste Water Treatment Regulations 2001*. Following consultation with the Office of Evidence and Assessment (OEA) it has been determined that Wexford Harbour is co-limiting for both phosphorus and nitrogen. Therefore, given that the p.e. of the agglomeration is between 10,000 and 100,000 p.e., ELVs of 2 mg/l for total phosphorus and 15 mg/l for total nitrogen have been set in the RL, in accordance with the *Urban Waste Water Treatment Regulations 2001*. These ELVs remain unchanged from the original licence D0030-01.

The ELVs of 10 mg/l for total ammonia and 15 mg/l for total oxidised nitrogen (TON) have been set in the RL which also remain unchanged from the original licence D0030-01. The standard for “Good/High” status of Dissolved Inorganic Nitrogen (DIN) in coastal receiving waters is ≤0.25/0.17 mg/l in accordance with *European Communities Environmental Objectives (Surface Water) Regulations 2009 as amended*.

Again as per the original licence D0030-01, the RL has set ELVs 25 mg/l for cBOD, 125 mg/l for chemical oxygen demand (COD), 35 mg/l for suspended solids (SS). These limits are in accordance with UWWT Regulations, 2001, as amended.

*Schedule A: Discharges & Discharge Monitoring* of the RL specifies the Emission Limit Values (ELVs) to which the discharge from the Wexford Town agglomeration must conform. Monitoring of the discharges will take place as per this schedule of the RL. The ELVs proposed for the primary discharge in the RL are achievable by the WWTP and are sufficient to protect the receiving water. All of the ELVs proposed for the primary discharge SW001 will apply from date of grant of licence.

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2 DIN is the sum of the concentrations of nitrate, nitrite and ammonia.
Leachate from Holmestown Landfill (Waste Licence Reg. No. W0191-02) discharges to the sewer network, which is treated by the WWTP in Strandfield. Condition 4.11 of the RL requires the licensee to establish and maintain a system for the management of leachate within the waste water works.

Secondary Discharge Point

The secondary discharge from the Wexford Town agglomeration is into the Murntown Upper Stream. Once the existing Murntown agglomeration is connected to the Wexford Town agglomeration this secondary discharge will be decommissioned.

The RL, as drafted, has set ELVs of 25mg/l for BOD, 125 mg/l for COD and 35 mg/l for suspended solids on the secondary discharge.

Schedule A: Discharges & Discharge Monitoring of the RL specifies the Emission Limit Values (ELVs) to which the secondary discharge must conform. Monitoring of the discharges will take place as per this schedule of the RL. The ELVs for the secondary discharge SW002 are considered sufficient to protect the receiving water and will apply from date of grant of licence.

The RL, as drafted, has set 31st December 2018 as the date for the cessation of the secondary discharge (SW002).

Wexford Harbour Outer Shellfish Area

The primary discharge point is located within the Wexford Harbour Outer shellfish area and the primary discharge is approximately 2.6 km downstream of the Wexford Harbour Inner shellfish area. The Wexford Harbour Outer Pollution Reduction Programme (PRP) and the Wexford Harbour Inner PRP lists the Wexford Town urban waste water system as a key pressure on the protected shellfish area.

The results of monitoring (2009-2015) undertaken in accordance with the PRPs indicated that there were historical water quality issues with faecal coliform levels within / in the vicinity of the shellfish area. The results of shellfish water monitoring for the other parameters do not indicate any other water quality issues within/ in the vicinity of this shellfish area. The bivalve mollusc production areas in Wexford Harbour Outer Shellfish Area are classified as ‘Class B’ for the purposes of EC Regulation 854/2004. The bivalve mollusc production areas in Wexford Harbour Inner Shellfish Area are classified as ‘Class C’ for the purposes of EC Regulation 854/2004 and is currently a dormant fishery, i.e., the fishery has been dormant for at least 12 months.

Condition 5.5 of the RL, as drafted, requires the licensee in consultation with Sea Fisheries Protection Authority (SFPA), the Marine Institute and Bord Iascaigh Mhara (BIM) determine if further assessment of the impact of the discharge(s) from the waste water works on the microbiological quality (including viruses) of the shellfish in the adjacent designated shellfish waters is required. Conditions 5.6 & 5.7 require, where the any such assessment finds that the discharge is having a deleterious effect on the shellfish, to install and maintain appropriate disinfection systems within a specified timeframe.

5. Ambient Monitoring

Schedule B: Ambient Monitoring of the RL specifies the parameters, analysis method and frequency for which ambient monitoring of the primary discharge shall be carried out. The requirements for ambient monitoring in Schedule B: Ambient Monitoring are sufficient to monitor for potential impacts on the status of the receiving water as a result of the discharge.
6. **Combined Approach**

The *Waste Water Discharge (Authorisation) Regulations 2007 as amended*, specify that a 'combined approach' in relation to licensing of waste water works must be taken, whereby the emission limits for the discharge are established on the basis of the stricter of either or both, the limits and controls required under the *Urban Waste Water Treatment Regulations 2001 as amended*, and the limits determined under statute or Directive for the purpose of achieving the environmental objectives established for surface waters, groundwater or protected areas for the water body into which the discharge is made. The RL as drafted gives effect to the principle of the Combined Approach as defined in *Waste Water Discharge (Authorisation) Regulations 2007 as amended*.

7. **Programme of Improvements**

The WWTP in Wexford Town provides Secondary treatment with nitrogen and phosphorus removal and UV treatment for wastewater from the Wexford Town agglomeration. Condition 5.1 of the RL requires the licensee to prepare and submit to the Agency a programme of infrastructural improvements to maximise the effectiveness and efficiency of the waste water works. The conditions and emission limit values specified in the RL will ensure no deterioration in the quality of the receiving waters as a result of the discharges. Condition 3.4 and Schedule C.2 of the RL requires the secondary discharge point SW002 to cease by 31/12/2018.

8. **Compliance with EU Directives**

In considering the application, regard was had to the requirements of Regulation 6(2) of the *Waste Water Discharge (Authorisation) Regulations 2007 as amended*, notably:

<table>
<thead>
<tr>
<th>Compliance with Directives/Regulations</th>
<th>Description and Conditions in RL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water Framework Directive [2000/60/EC]</td>
<td>Good status to be achieved by 2021</td>
</tr>
<tr>
<td>EC Environmental Objectives (Surface Water) Regulations 2009 (S.I. No. 272 of 2009) as amended</td>
<td>Schedule A of RL sets ELVs to contribute towards achieving the environmental quality objectives.</td>
</tr>
<tr>
<td>Drinking Water Abstraction Regulations</td>
<td>There are no drinking water abstractions downstream.</td>
</tr>
<tr>
<td>Bathing Water Directive [2006/7/EC]</td>
<td>Rosslare Strand, Curracloe and Ballinesker Bathing Waters are approximately 8.6 km, 10.9 km and 12 km away from the discharge point, respectively. 2016 monitoring results show that each of these Bathing Waters were of excellent water quality during this monitoring period.</td>
</tr>
</tbody>
</table>

The Wexford Town agglomeration discharges directly into the Slaney River Valley SAC\(^3\). The site is protected for habitats listed under Annex I of the Habitats Directive. It is also selected for protection of species listed under Annex II of the same directive.

Appendix 2 lists the European Sites assessed, their associated qualifying interests and conservation objectives along with the assessment of the effects of the discharges from the agglomeration on the European Sites.

A screening for Appropriate Assessment was undertaken to assess, in view of best scientific knowledge and the conservation objectives of the site, if the activities, individually or in combination with other plans or projects is likely to have a significant effect on any European Site. In this context, particular attention was paid to the following European Sites:

1. Slaney River Valley SAC (Site Code: 000781)
2. Wexford Harbour and Slobs SPA (Site Code: 004076)
3. The Raven SPA (Site Code: 004019)
4. Raven Point Nature Reserve SAC (Site Code: 000710)
5. Long Bank SAC (Site Code: 002161)
6. Blackwater Bank SAC (Site Code: 002953)
7. Carnsore Point SAC (Site Code: 002269)

The activities are not directly connected with or necessary to the management of any European Site and the Agency considered, for the reasons set out below, that it cannot be excluded, on the basis of objective information, that the activities, individually or in combination with other plans or projects, will have a significant effect on any European Site and accordingly determined that an Appropriate Assessment of the activity was required.

This determination is based on the fact that the Lower Slaney Estuary (IE_SE_040_0200) into which the wastewater treatment plant discharges is currently assigned ‘poor’ water quality status under the Water Framework Directive (WFD). Furthermore, the water quality in Wexford Harbour is currently assigned ‘moderate’ status under the WFD.

An Inspector’s Appropriate Assessment has been completed and has determined, based on best scientific knowledge in the field and in accordance with the European Communities (Birds and Natural Habitats) Regulations 2011 as amended, pursuant to Article 6(3) of the Habitats Directive, that the activity, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site, in particular Slaney River Valley SAC, Wexford Harbour and Slobs SPA, The Raven SPA, Raven Point Nature Reserve SAC, Long Bank SAC, Blackwater Bank SAC and Carnsore Point SAC, having regard to their conservation objective’s and will not affect the preservation of these sites at favourable conservation status if carried out in accordance with this recommended licence (RL) and the conditions attached hereto for the following reasons:

- The ELVs set in the RL will ensure that the quality of the receiving waters are in compliance with the European Communities Environmental Objectives (Surface Water) Regulations 2009 as amended and will contribute to the receiving waters achieving ‘good’ status as required under the Water Framework Directive.

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- Condition 3.5 of the RL requires that all storm water overflows shall be in compliance with the criteria for storm water overflows, as set out in the DoECLG ‘Procedures and Criteria in Relation to Storm Water Overflows’, 1995 and any other guidance as may be specified by the Agency.
- Condition 3.3 of the RL requires the licensee to take such measures as necessary to ensure that no deterioration in the quality of the receiving waters shall occur as a result of the discharge.

In light of the foregoing reasons no reasonable scientific doubt remains as to the absence of adverse effects on the integrity of the following European Site(s): Slaney River Valley SAC, Wexford Harbour and Slobs SPA, The Raven SPA, Raven Point Nature Reserve SAC, Long Bank SAC, Blackwater Bank SAC and Carnsore Point SAC.

9. Cross Office Liaison
Advice and guidance issued by the Waste Water Technical Working Group (WWTWG) was followed in the assessment of this application. Advice and guidance issued by the WWTWG is prepared through a detailed cross-office co-operative process, with the concerns of all sides taken into account. The Board of the Agency has endorsed the advice and guidance issued by the WWTWG for use by licensing inspectors in the assessment of wastewater discharge licence applications.

I have consulted with my colleagues in the Catchments Science and Management Unit (CSMU) of the EPA and at present following their initial characterisation output study the Wexford Town agglomeration is highlighted by the CSMU as a pressure on the receiving water. It is believed that there are also other pressures, including agriculture, on the receiving water and the CSMU have stated that the degree of confidence in the outcomes of the initial characterisation study is not high where there are multiple pressures. Therefore, this output is subject to further investigative assessment. The Wexford Harbour is located in an area for action, which means it is one of the water bodies that will be prioritised for investigative assessment in the current River Basin Management Plan (RBMP) cycle which runs up until 2021.

10. Submissions
One (1. no.) submission was received in relation to this application. The issues raised in the submission are summarised below. However, the original submission should be referred to at all times for greater detail and expansion of particular points.

Submission 1: Catherine Dunne, Principal Environmental Health Officer, Environmental Health Services, HSE South, Whitemill Industrial Estate, Wexford.

Ms Dunne’s submission notes that from the HSE’s review of the licence application that an assessment of the storm water overflows is needed. Ms Dunne makes comments in relation to the water quality of the receiving water. Ms Dunne also notes that the Murntown WWTP is to be decommissioned and makes suggestions for the future use of the land on which the WWTP is located.

Response:
Condition 3.5 of the recommended licence (RL) requires that all storm water overflows shall be in compliance with the criteria for storm water overflows, as set out in the DoECLG ‘Procedures and Criteria in Relation to Storm Water Overflows’, 1995 and any other guidance as may be specified by the Agency.

Schedule A: Discharges and Discharge Monitoring specifies emission limit values in accordance with the requirements of the European Communities (Environmental
**Objectives** Surface Water Regulations 2009 as amended. These ELVs will protect the quality of the receiving water and continue to provide a beneficial effect on the waterbody.

The comments in relation to the future use of the land, on which the Murntown WWTP is currently located, is outside the scope of the licence.

**11. Charges**

The RL requires that the licensee shall pay to the Agency, such sum as the Agency from time to time determines is reflective of the monitoring and enforcement regime being proposed for the agglomeration.

**12. Recommendation**

I recommend that a Final Licence be issued subject to the conditions and for the reasons as set out in the attached Recommended Licence.

Signed

[Signature]

Deirdre French
Inspector
Environmental Licensing Programme
Appendix 1: Map showing location of Wexford Town WWTP and associated primary discharge point.
Appendix 2: Assessment of the effects of discharges from the agglomeration on European sites and proposed mitigate measures.

<table>
<thead>
<tr>
<th>Site Code</th>
<th>Site Name</th>
<th>Distance To (km)</th>
<th>Qualifying Interests (* denotes a priority habitat)</th>
<th>Conservation Objectives</th>
<th>Assessment</th>
</tr>
</thead>
</table>
| 000781    | Slaney River Valley SAC | Discharge within SAC | **Habits**
1130 Estuaries
1140 Mudflats and sandflats not covered by seawater at low tide
1330 Atlantic salt meadows (Glaucoc-Puccinelliophilia maritimae)
1410 Mediterranean salt meadows (Juncetalia maritimi)
3260 Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation
91A0 Old sessile oak woods with Ilex and Blechnum in the British Isles
91E0 Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)*
**Species**
1365 Harbour Seal (*Phoca vitulina*)
1103 Twaite Shad (*Alosa fallax fallax*)
1099 River Lamprey (*Lampetra fluviatilis*)
1096 Brook Lamprey (*Lampetra planeri*)
1095 Sea Lamprey (*Petromyzon marinus*)
1106 Salmon (*Salmo salar*)
1355 Otter (*Lutra lutra*)
1029 Freshwater Pearl Mussel (*Margaritifera margaritifera*) |
Discharge to water systems can lead to an altered nutrient balance (eutrophication), potential threat of toxicity, reduction in biological status and loss of habitat.

**Conclusion:**
The RL specifies ELVs for the primary discharge which are set to ensure that emissions from this source will protect the quality of the receiving waters, to comply with the requirements of the European Communities Environmental Objectives (Surface Water) Regulations as amended. The ELVs specified will also contribute to the receiving waters achieving 'good' status as required under the Water Framework Directive. Furthermore, Condition 3.5 of the RL requires that all storm water overflows shall be in compliance with the criteria for storm water overflows, as set out in the DoECLG 'Procedures and Criteria in Relation to Storm Water Overflows', 1995 and any other guidance as may be specified by the Agency. Condition 3.3 of the RL requires the licensee to take such measures as necessary to ensure that no deterioration in the quality of the receiving waters shall occur as a result of the discharge.

**Potential for Accidents to Arise**
There is the potential for accidents and emergency situations arising at a waste water works resulting in partially treated or untreated waste waters discharging to the receiving waters. Such incidents or events could lead to the breah of ELVs and the discharge of elevated levels of polluting organic matter, which would have the potential to impact on the receiving water environment.

**Conclusion:**
Condition 5.1.7 of the RL requires the licensee to identify measures to minimise any environmental damage associated with discharges or overflows from the waste water works following anticipated events or accidents/incidents. Condition 4.20 of the RL requires the licensee to provide an annual statement as to the measures taken or adopted to minimise environmental damage associated with discharges or overflows from the waste water works following anticipated events or accidents/incidents.
| 000710 | Raven Point Nature Reserve SAC | 4.3 km | **Habitats**  
1140 Mudflats and sandflats not covered by seawater at low tide  
1210 Annual vegetation of drift lines  
1330 Atlantic salt meadows (Glauco-Puccinellietalia maritimae)  
2110 Embryonic shifting dunes  
2120 Shifting dunes along the shoreline with Ammophila arenaria (white dunes)  
2130 Fixed coastal dunes with herbaceous vegetation (grey dunes)*  
2170 Dunes with Salix repens ssp.argentea (Salicion arenariae)  
2190 Humid dune slacks | **Emission to Water**  
Discharge of effluent to water systems can lead to an altered nutrient balance (eutrophication), potential threat of toxicity, reduction in biological status and loss of habitat.  
**Conclusion:**  
The RL specifies ELVs for the primary discharge which are set to ensure that emissions from this source will protect the quality of the receiving waters, to comply with the requirements of the *European Communities Environmental Objectives (Surface Water) Regulations as amended*. The ELVs specified will also contribute to the receiving waters achieving ‘good’ status as required under the Water Framework Directive. Furthermore, Condition 3.5 of the RL requires that all storm water overflows shall be in compliance with the criteria for storm water overflows, as set out in the DoECLG ‘Procedures and Criteria in Relation to Storm Water Overflows’, 1995 and any other guidance as may be specified by the Agency. Condition 3.3 of the RL requires the licensee to take such measures as necessary to ensure that no deterioration in the quality of the receiving waters shall occur as a result of the discharge.  
**Potential for Accidents to Arise**  
There is the potential for accidents and emergency situations arising at a waste water works resulting in partially treated or untreated waste waters discharging to the receiving waters. Such incidents or events could lead to the breach of ELVs and the discharge of elevated levels of polluting organic matter, which would have the potential to impact on the receiving water environment.  
**Conclusion:**  
Condition 5.1.7 of the RL requires the licensee to identify measures to minimise any environmental damage associated with discharges or overflows from the waste water works following anticipated events or accidents/incidents. Condition 4.20 of the RL requires the licensee to provide an annual statement as to the measures taken or adopted to minimise environmental damage associated with discharges or overflows from the waste water works following anticipated events or accidents/incidents. |}

NPWS (2011)  
Conservation Objectives: Raven Point Nature Reserve SAC  
<table>
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<tbody>
<tr>
<td>002161</td>
<td>Long Bank SAC 9.9 km</td>
<td>1110 Sandbanks which are slightly covered by sea water all the time</td>
<td>Emission to Water Discharge of effluent to water systems can lead to an altered nutrient balance (eutrophication), potential threat of toxicity, reduction in biological status and loss of habitat. Conclusion: The RL specifies ELVs for the primary discharge which are set to ensure that emissions from this source will protect the quality of the receiving waters, to comply with the requirements of the European Communities Environmental Objectives (Surface Water) Regulations as amended. The ELVs specified will also contribute to the receiving waters achieving ‘good’ status as required under the Water Framework Directive. Furthermore, Condition 3.5 of the RL requires that all storm water overflows shall be in compliance with the criteria for storm water overflows, as set out in the DoECLG 'Procedures and Criteria in Relation to Storm Water Overflows', 1995 and any other guidance as may be specified by the Agency. Condition 3.3 of the RL requires the licensee to take such measures as necessary to ensure that no deterioration in the quality of the receiving waters shall occur as a result of the discharge. Furthermore, The Southwestern Irish Sea coastal waterbody which is located between the discharge point and the Long Bank SAC is currently assigned ‘Good’ water quality status under the Water Framework Directive. Potential for Accidents to Arise There is the potential for accidents and emergency situations arising at a waste water works resulting in partially treated or untreated waste waters discharging to the receiving waters. Such incidents or events could lead to the breach of ELVs and the discharge of elevated levels of polluting organic matter, which would have the potential to impact on the receiving water environment. Conclusion: Condition 5.1.7 of the RL requires the licensee to identify measures to minimise any environmental damage associated with discharges or overflows from the waste water works following anticipated events or accidents/incidents. Condition 4.20 of the RL requires the licensee to provide an annual statement as to the measures taken or adopted to minimise environmental damage associated with discharges or overflows from the waste water works following anticipated events or accidents/incidents.</td>
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<td>ID</td>
<td>Location</td>
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**Emission to Water**

Discharge of effluent to water systems can lead to an altered nutrient balance (eutrophication), potential threat of toxicity, reduction in biological status and loss of habitat.

**Conclusion:**

The RL specifies ELVs for the primary discharge which are set to ensure that emissions from this source will protect the quality of the receiving waters, to comply with the requirements of the *European Communities Environmental Objectives (Surface Water) Regulations as amended*. The ELVs specified will also contribute to the receiving waters achieving ‘good’ status as required under the Water Framework Directive. Furthermore, Condition 3.5 of the RL requires that all storm water overflows shall be in compliance with the criteria for storm water overflows, as set out in the DoECLG ‘Procedures and Criteria in Relation to Storm Water Overflows’, 1995 and any other guidance as may be specified by the Agency. Condition 3.3 of the RL requires the licensee to take such measures as necessary to ensure that no deterioration in the quality of the receiving waters shall occur as a result of the discharge. Furthermore, The Southwestern Irish Sea coastal waterbody which is located between the discharge point and the Long Bank SAC is currently assigned ‘Good’ water quality status under the Water Framework Directive.

**Potential for Accidents to Arise**

There is the potential for accidents and emergency situations arising at a waste water works resulting in partially treated or untreated waste waters discharging to the receiving waters. Such incidents or events could lead to the breach of ELVs and the discharge of elevated levels of polluting organic matter, which would have the potential to impact on the receiving water environment.

**Conclusion:**

Condition 5.1.7 of the RL requires the licensee to identify measures to minimise any environmental damage associated with discharges or overflows from the waste water works following anticipated events or accidents/incidents. Condition 4.20 of the RL requires the licensee to provide an annual statement as to the measures taken or adopted to minimise environmental damage associated with discharges or overflows from the waste water works following anticipated events or accidents/incidents.
|--------|---------------------|--------|-------------|----------------------------------------------------------------------------------------------------------------------------------|

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|-----------|----------|----------|-------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 004076    | Wexford Harbour and Slobs SPA | 0.067 km | A037 Bewick's Swan (*Cygnus columbianus bewickii*)  
A395 Greenland White-fronted Goose (*Anser albifrons flavirostris*)  
A160 Curlew (*Numenius arquata*)  
A156 Black-tailed Godwit (*Limosa limosa*)  
A125 Coot (*Fulica atra*)  
A162 Redshank (*Tringa totanus*)  
A050 Wigeon (*Anas penelope*)  
A162 Lesser Black-backed Gull (*Larus fuscus*)  
A052 Teal (*Anas crecca*)  
A004 Little Grebe (*Tachybaptus ruficollis*)  
A048 Shelduck (*Tadorna tadorna*)  
A130 Oystercatcher (*Haematopus ostralegus*)  
A195 Little Tern (*Sterna albifrons*)  
A028 Grey Heron (*Ardea cinerea*)  
A017 Cormorant (*Phalacrocorax carbo*)  
A179 Black-headed Gull (*Chroicocephalus ridibundus*)  
A069 Red-breasted Merganser (*Mergus serrator*)  
A062 Scaup (*Aythya marila*)  
A046 Light-bellied Brent Goose (*Branta bernicla hrota*)  
A038 Whooper Swan (*Cygnus cygnus*)  
A143 Knot (*Calidris canutus*)  
A140 Golden Plover (*Pluvialis apricaria*)  
A157 Bar-tailed Godwit (*Limosa lapponica*)  
A005 Great Crested Grebe (*Podiceps cristatus*)  
A067 Goldeneye (*Bucephala clangula*) | Emission to Water  
Discharge of effluent to water systems can lead to an altered nutrient balance (eutrophication), potential threat of toxicity, reduction in biological status and loss of habitat. Many of the birds of the SPA would be dependent on water based species (e.g. fish) as a food source.  
**Conclusion:**  
The RL specifies ELVs for the primary discharge which are set to ensure that emissions from this source will protect the quality of the receiving waters, to comply with the requirements of the European Communities Environmental Objectives (Surface Water) Regulations as amended. The ELVs specified will also contribute to the receiving waters achieving 'good' status as required under the Water Framework Directive. Furthermore, Condition 3.5 of the RL requires that all storm water overflows shall be in compliance with the criteria for storm water overflows, as set out in the DoECLG 'Procedures and Criteria in Relation to Storm Water Overflows', 1995 and any other guidance as may be specified by the Agency.  
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A054 Pintail (*Anas acuta*)
A149 Dunlin (*Calidris alpina*)
A053 Mallard (*Anas platyrhynchos*)
A141 Grey Plover (*Pluvialis squatarola*)
A082 Hen Harrier (*Circus cyaneus*)
A144 Sanderling (*Calidris alba*)
A142 Lapwing (*Vanellus vanellus*)

**Habitats**
Wetlands

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**004019 The Raven SPA**

**Birds**
A141 Grey Plover (*Pluvialis squatarola*)
A065 Common Scoter (*Melanitta nigra*)
A001 Red-throated Diver (*Gavia stellata*)
A144 Sanderling (*Calidris alba*)
A395 Greenland White-fronted Goose (*Anser albifrons flavirostris*)
A017 Cormorant (*Phalacrocorax carbo*)

**Habitats**
Wetlands

**Emission to Water**
Discharge of effluent to water systems can lead to an altered nutrient balance (eutrophication), potential threat of toxicity, reduction in biological status and loss of habitat. Many of the birds of the SPA would be dependent on water based species (e.g. fish) as a food source.

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**Potential for Accidents to Arise**
There is the potential for accidents and emergency situations arising at a waste water works resulting in partially treated or untreated waste waters discharging to the receiving waters. Such incidents or events could lead to the breach of ELVs and the discharge of elevated levels of polluting organic matter, which would have the potential to impact on the receiving water environment.

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