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Natura Impact Statement in support of the Appropriate Assessment for the Draft Water Services Strategic Plan

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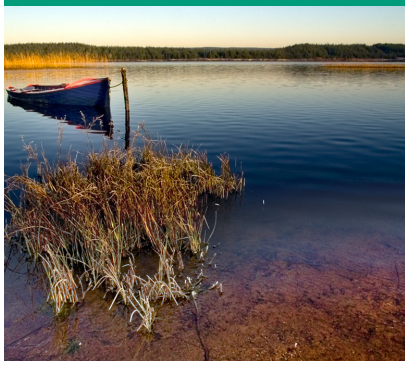

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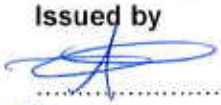

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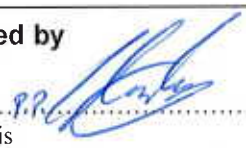

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/Irish Water

Water Services Strategic Plan

Appropriate Assessment / Natura Impact Statement

Amec Foster Wheeler Environment & Infrastructure UK Limited

January 2015

Executive Summary

Section 33 of the *Water Services (No.2) Act (2013)* requires that Irish Water (IW) prepares a Water Services Strategic Plan (WSSP) that sets out IW's objectives over a 25 year period. The WSSP is a high-level overarching strategy that will sit at the highest tier (known as Tier 1) of water services planning in Ireland. The strategies contained within the WSSP will be realised through a number of Implementation Plans (IPs) (Tier 2), with the specific projects and activities that are necessary to fulfil the provisions of the WSSP and IPs detailed at Tier 3 of the hierarchy. Consequently, the WSSP is not spatially specific and does not identify specific projects or schemes.

Article 6(3) of the Habitats Directive 92/43/EEC requires that competent authorities assess the potential impacts of plans and programmes on the Natura 2000 network of European protected sites to determine whether there will be any 'likely significant effects' (LSE) as a result of a plan's implementation (either on its own or 'in combination' with other plans or projects); and, if so, whether these effects will result in any adverse effects on the site's integrity. The provisions of the Habitats Directive 92/43/EEC are transposed into Irish law by the *European Communities (Birds and Natural Habitats) Regulations 2011* (as amended). The WSSP is a strategic plan and as such is subject to the provisions of Article 6(3) and the *European Communities (Birds and Natural Habitats) Regulations 2011* (as amended). Part 5 of the 2011 Regulations essentially describes a two-stage process for the assessment of plans and projects under Article 6(3), comprising 'screening' (sometimes referred to as 'AA screening') and 'Appropriate Assessment' (AA).

Irish Water, supported by AOS Planning, has previously undertaken a screening of the emerging WSSP. This screening concluded that the WSSP requires AA since it is not directly connected with or necessary to the management of a European site; and it may have significant impacts on the Natura 2000 network. Therefore, applying the Precautionary Principle and in accordance with Article 6(3) of the Habitats Directive, a Stage 2 Appropriate Assessment was deemed required as the possibility of significant effects on the Natura 2000 network could not be excluded.

Amec Foster Wheeler Environment and Infrastructure UK Limited (Amec Foster Wheeler), under the management of Nicholas O'Dwyer Ltd., was commissioned by IW to undertake the preparation of a Natura Impact Statement in support of the Appropriate Assessment of the draft WSSP. The WSSP aims and strategies have been reviewed and potential impact pathways by which European sites could be adversely affected have been identified and appropriate measures that should be employed in the final Plan to ensure that significant adverse effects do not occur as a result of the Plan's implementation have been proposed.

The assessment of the WSSP strategies has demonstrated the following points.

- 49 of 68 strategies will have 'no effect' on any European sites (and therefore no 'in combination' effects either). The majority of these are directions to prepare lower-tier plans or undertake activities that are themselves likely to be neutral in their effects (e.g. engage with stakeholders; operate an equitable New Connections Charging Policy; etc.).

- 12 strategies cannot be meaningfully assessed at this level (e.g. the strategies contain elements that could ultimately result in significant effects on a European site, depending on future implementation, but is too unspecific to allow assessment at this point in the planning hierarchy).

- 7 strategies will have 'no significant adverse effect'. These are generally strategies that commit to environmental protection or other compliance (e.g. with the WFD) that are likely to have a positive effect on European sites (i.e. there will be an effect but it will not undermine any site's conservation objectives).

Where there is uncertainty over the ultimate outcomes, inclusion of an overarching environmental protection strategies and supporting text (e.g. Strategy EN1e) will provide an appropriate safeguard to ensure that the delivery of the WSSP will not adversely affect any European sites, particularly where assessment is not possible at this level in the hierarchy. These protective strategies will require that all lower-tier plans, strategies and projects derived from the WSSP avoid or appropriately mitigate any potential significant adverse effects that may be identified during their development.

It is therefore concluded that the WSSP will have no significant adverse effect on any European site, although, it will remain necessary to undertake Appropriate Assessment on the lower-tier Implementation Plans and projects (Tier 2 and Tier 3, respectively) as these are developed.

Potential positive effects on European sites are not factored into the Appropriate Assessment (the legislative test does not consider the balance of positive and negative effects). However, it is worth noting that the development of the WSSP, and the strategic management of water resources and wastewater provision by a national body, will help improve the condition of many European sites and support the achievement and maintenance of favourable conservation status across the Natura 2000 network.

Contents

1. Introduction

1.1 The Water Services Strategic Plan

Irish Water (IW) is responsible for the development and provision of water and wastewater services throughout Ireland, having assumed responsibility for this from the 34 local authorities in January 2014. IW therefore supplies drinking water to over 80% of the population and has adopted a large portfolio of assets including pumping stations; approximately 60,000 km of water pipelines and 25,000 km of wastewater pipelines; and some 856 water treatment plants (WTPs) and over 1,000 wastewater treatment plants (WwTPs).

Section 33 of the *Water Services (No.2) Act (2013)* requires that IW prepares a Water Services Strategic Plan (WSSP) that sets out IW's objectives in relation to the provision of water services over a 25 year period. The WSSP must address the following aspects.

- Drinking water quality.
- The prevention or abatement of risk to human health or environment relating to the provision of water services.
- Existing and projected demand for water services.
- Existing and planned arrangements for provisions of water services.
- Existing and reasonably foreseeable deficiencies in the provision of water services.
- Existing and planned water conservation measures.
- The management of the property of Irish Water.

The WSSP is a high-level overarching strategy that will sit at the highest tier (known as Tier 1) of water services planning in Ireland. The WSSP strategies will be realised through a number of Implementation Plans (Tier 2) which will be prepared by IW following the approval of the WSSP; these Implementation Plans will include, for example, a National Water Resources Plan and National Sludge Management Plan[1]. The specific projects and activities that are necessary to fulfil the provisions of the WSSP and Implementation Plans will then be detailed at Tier 3 of the hierarchy (i.e. project level). Consequently, the aims and strategies of the WSSP are not spatially specific and do not identify specific projects or schemes.

A full list of the WSSP strategic objectives and associated aims and strategies are contained in **Appendix A**.

[1] Note, this list of plans is not exhaustive and the titles of lower-tier plans may change.

1.2 Article 6 Assessments

Article 6(3) of the Habitats Directive 92/43/EEC requires that competent authorities assess the potential impacts of plans and projects on the Natura 2000 network of European protected sites[2] to determine whether there will be any 'likely significant effects' (LSE) as a result of a plan's or projects implementation (either on its own or 'in combination' with other plans or projects); and, if so, whether these effects will result in any adverse effects on the site's integrity.

Article 6(4) of the Habitats Directive sets out the decision-making tests which must be applied to plans or projects that may impact a Natura 2000 site. Article 6(4) also requires compensatory measures to ensure that the coherence of the Natura 2000 network is protected if adverse effects on a European site cannot be avoided or mitigated. The provisions of the Habitats Directive 92/43/EEC are transposed into Irish law by the *European Communities (Birds and Natural Habitats) Regulations 2011* (as amended).

The process by which the impacts of a plan or project is assessed against the conservation objectives of a European site is commonly known as 'Appropriate Assessment' or 'Habitats Directive Assessment' (HDA)[3]. European Commission guidance[4] suggests a four-stage process for this assessment, although not all stages will necessarily be required (see **Box 1**).

[2] Natura 2000 is the European network of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) designated under Directive 92/43/EEC (the 'Habitats Directive') and Directive 2009/147/EC (the 'new wild birds directive') respectively. These sites are protected by Article 6(3) of the Habitats Directive (this applies to SACs from the point at which the European Commission and the Government agree the site as a 'Site of Community Importance' (SCI)). Article 6(3) of the Habitats Directive and Article 4(4) of the Birds Directive also apply (respectively) to any other site or area that the Commission believes should be considered as an SAC or SPA, until their status is determined. Under the *European Communities (Birds and Natural Habitats) Regulations 2011 (as amended)* the term 'European site' applies to any designated SAC or SPA; any SCI; any candidate SCI (cSCI); any candidate SAC (cSAC); and any candidate SPA (cSPA).

[3] 'Appropriate Assessment' has been historically used as an umbrella term to describe the process of assessment as a whole. This process is now more commonly divided into distinct stages, one of which is the Appropriate Assessment stage. The process as a whole is generally referred to as an 'Article 6 Assessment' (or sometimes as a 'Habitats Directive Assessment') for convenience, although these terms are not included within the legislation.

[4] EC (2001). *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*. European Commission guidance produced by the Impacts Assessment Unit, Oxford Brookes University.

Box 1 Stages of Article 6 Assessment
Stage 1 – Screening: This stage identifies the likely impacts upon a European Site of a project or plan, either alone or 'in combination' with other projects or plans, and considers whether these impacts are likely to be significant. **Stage 2 – Appropriate Assessment:** Where there are likely significant effects, this stage considers the effects of the plan or project on the integrity of the relevant European Sites, either alone or 'in combination' with other projects or plans, with respect to the sites' structure and function and their conservation objectives. Where it cannot be concluded that there will be no adverse effects on sites' integrity, it is necessary to consider potential mitigation for these effects. **Stage 3 – Assessment of Alternative Solutions:** Where adverse effects remain after the inclusion of mitigation, this stage examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of European Sites. **Stage 4 – Assessment Where No Alternative Solutions Exist and Where Adverse Impacts Remain:** This stage assesses compensatory measures where it is deemed that the project or plan should proceed for imperative reasons of overriding public interest (IROPI). The EC guidance does not deal with the assessment of IROPI.

The WSSP is a strategic plan and as such is subject to the provisions of Article 6(3) and the *European Communities (Birds and Natural Habitats) Regulations 2011* (as amended). However, Article 6(3) essentially provides a test that the adopted version of a plan must pass; there is no requirement for the assessment to be undertaken on draft versions or earlier iterations of the Plan. As with Strategic Environmental Assessment (SEA) however, it is accepted best-practice for the assessment of strategic planning documents to be run as an iterative process alongside the Plan development, with the emerging proposals or options continually assessed for their possible effects on European sites and modified or abandoned (as necessary) to ensure that the subsequently adopted Plan is not likely to result in significant adverse effects on any European sites, either alone or 'in combination' with other plans. It is therefore important to recognise that the assessment of strategic plans is ideally as much about guiding the development of the Plan (and demonstrating that this has been done) as it is about (ultimately) assessing its effects.

1.3 This Report

The provisions of Articles 6(3) and 6(4) of the Habitats Directive 92/43/EEC are transposed into Irish law by Part 5 of the *European Communities (Birds and Natural Habitats) Regulations 2011* (as amended). Part 5 essentially describes a two-stage process for the assessment of plans and projects under Article 6(3), comprising 'screening' (sometimes referred to as 'AA screening') and 'Appropriate Assessment' (AA).

IW, supported by AOS Planning, has previously undertaken a screening of the emerging WSSP[5]. This screening concluded that the WSSP requires AA since it is not directly connected with or necessary to the management of a European site; and may have significant impacts on the Natura 2000 network. Therefore, applying the

[5] AOS Planning (2014). *Appropriate Assessment Outline Screening Report in support of the Appropriate Assessment of the Water Services Strategic Plan in accordance with the requirements of Article 6(3) of the EU Habitats Directive*. Report for Irish Water. AOS Planning, Dublin. (See **Appendix B**)

Precautionary Principle and in accordance with Article 6(3) of the Habitats Directive, a Stage 2 Appropriate Assessment was deemed required as the possibility of significant effects on the Natura 2000 network could not be excluded.

Amec Foster Wheeler Environment and Infrastructure UK Limited (Amec Foster Wheeler), under the management of Nicholas O'Dwyer Ltd., was subsequently commissioned by IW to undertake the preparation of a Natura Impact Statement (NIS) in support of the Appropriate Assessment of the draft WSSP and to determine whether any aspects of the WSSP (alone or in-combination) could have significant adverse effects on the integrity of any European sites.

This report summarises Amec Foster Wheeler's assessment of the emerging WSSP, and sets out the iterative process that has been undertaken to support the delivery of the WSSP and ensure that it meets the requirements of the *European Communities (Birds and Natural Habitats) Regulations 2011* (as amended). This NIS report should be read in conjunction with the AOS (2014) AA Screening Report (see **Appendix B**). This NIS provides a review of the draft WSSP strategies under each Plan aim and identifies potential impact pathways by which European sites could be affected; it then identifies appropriate measures that should be employed in the final Plan to ensure that significant adverse effects do not occur as a result of the Plan's implementation.

2. Approach

2.1 Guidance

The following guidance has been used during the preparation of this Natura Impact Statement in support of the Appropriate Assessment of the draft WSSP:

- DEHLG (2010) *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities*. Department of Environment, Heritage and Local Government, Dublin.
- European Commission (2001) *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*. European Commission, Brussels.
- UK Water Industry Research Ltd (2012) *Strategic Environmental Assessment and Habitats Regulations Assessment - Guidance for Water Resources Management Plans and Drought Plans*. UKWIR, Queen Anne's Gate, London.
- RSPB (2008) *Appropriate Assessment of Spatial Plans in Northern Ireland. A guide to why, when and how to do it*. RSPB, Sandy, Beds.
- DTA Publications (2013) *The Habitats Regulation Handbook* [online]. Available at: http://www.dtapublications.co.uk/handbook/. Accessed 11.11.14.
- SNH (2012) *Habitats Regulations Appraisal of Plans: Guidance for plan-making bodies in Scotland*. Scottish Natural Heritage / David Tyldesley Associates.

2.2 Overview

The current European Commission guidance[6] suggests a four stage process for the assessment against Article 6, which is summarised in **Box 1**. The assessment process determines whether there will be any 'likely significant effects' (LSEs) on any European sites as a result of a plan's implementation, either on its own or 'in combination' with other plans or projects (screening) and, if so, whether it can be concluded that there will be no adverse effects on the sites' integrity (Appropriate Assessment).

The standard stepwise approach summarised in **Box 1** works well at the project-level where the scheme/project design is established and possible effects on European sites can be quantitatively assessed with the benefit of detailed survey data. In contrast, the fundamental nature of the WSSP presents a number of distinct challenges for a 'strategic' AA; in particular, every possible outcome of the Plan cannot always be identified and assessed in detail, requiring reliance on precautionary 'avoidance measures' or mitigation within the text to ensure that significant adverse effects do not occur as a result of the Plan's implementation. It is therefore important to understand how

[6] *Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC* (EC 2002).

the WSSP is developed, how it would operate in practice, and hence how it might consequently affect European sites when identifying suitable measures.

2.3 Key Issues for AA of the WSSP

2.3.1 Understanding the Likely Outcomes of the WSSP

IW is responsible for the provision and development of water and wastewater services throughout Ireland. Its day-to-day activities include:

- The abstraction and storage of raw surface water or groundwater;
- The treatment of abstracted water to potable standard;
- The storage and distribution of treated water;
- The collection of wastewater from customers connected to the public wastewater sewer network;
- The collection and treatment of surface water where drains are connected to the public sewer network;
- The treatment of wastewater to a standard set by legislation;
- Discharging treated wastewater under licence/certification by the EPA;
- Management, reuse and disposal of residual wastes and sludges; and
- The construction, operation, maintenance and management of the infrastructure and assets required to deliver the above.

Most of these activities have the potential to affect European sites, either due to current operation or through any future development and capital works that may be required. Consequently, it is easy to perceive mechanisms by which strategic plans produced by IW, to help plan and deliver its services, could also affect European sites.

The WSSP is a high-level plan that sets a framework for IW's development as a utility and establishes the broad principles for the management of its assets and delivery of its statutory obligations. It outlines the strategic direction for IW over the short, medium and long-term, up to 2040, providing a basis for planning water services to meet environmental compliance commitments in a cost effective manner. This is done through the identification of 'aims' for the efficient delivery of services, and 'strategies' for meeting these.

It is important to recognise that there is no geographical context attributed to the WSSP aims and strategies; rather, the aims and strategies will be realised through lower-tier Implementation Plans which will set out in more detail how specific aspects of IWs services will be managed or delivered. These Implementation Plans will include, for example, a National Water Resources Plan and a National Sludge Management Plan. Specific projects and activities that are necessary to fulfil the provisions of the Implementation Plans will be detailed at a lower-tier i.e. Tier 3 Projects.

As a result, the aims and strategies within the WSSP are necessarily high-level. Whilst they may address or identify the broad service-provision requirements, or set a direction for future capital or operational investment, they are not spatially specific and do not identify specific projects or schemes.

2.3.2 Uncertainty and 'Down the Line' Assessment

The WSSP will influence the future provision of water and wastewater services in Ireland and so there are many conceivable ways in which it could also have an influence on European sites. However, due to its wide scope, position in the planning hierarchy and long-term outlook there are inevitably a large number of uncertainties inherent within it and its outcomes. For example, a high-level aim advocating asset management could (arguably) lead to development on or near a European site; equally, it may not. Assuming direct effects such as this would ignore all the other stages and tiers in the planning process, and the opportunities for mitigation and avoidance that these provide. Often, specific effects on specific European sites cannot be identified and in searching for these effects there is a risk that the assessment begins to focus on effects that are 'imaginable' rather than 'likely', with a consequent risk that avoidance measures are not appropriately focused. What the higher-tier plan must avoid is making an effect on a European site an inevitable or likely outcome, or constraining lower-tier plans and projects such that an effect becomes more likely.

As a result, the AA must consider and assess the strategies under each aim within the WSSP **appropriately**, whilst recognising (and mitigating) the inherent uncertainties within those strategies (i.e. the absence of any implementation details) and within the Plan itself.

It is recognised that some potential effects (or required mitigation) cannot be clearly determined at the strategic-level. In these instances, current guidance[7] (in Scotland, for example) indicates that it may be appropriate and acceptable for some or all of the assessment to be undertaken 'down-the-line' at a lower tier in the planning hierarchy, if:

- the higher tier Plan appraisal cannot reasonably predict the effects on a European site in a meaningful way; whereas;
- the lower tier Plan, which will identify more precisely the nature, scale or location of development, and thus its potential effects, retains enough flexibility within the terms of the higher tier plan over the exact location, scale or nature of the proposal to enable an adverse effect on site integrity to be avoided; and
- Appropriate Assessment of the Plan at the lower tier is required as a matter of law or Government policy[8].

[7] SNH (2012) *Habitats Regulations Appraisal of Plans: Guidance for plan-making bodies in Scotland*. Scottish Natural Heritage / David Tyldesley Associates.

[8] In some (rare) instances Government policy may extend the provisions that are strictly applicable to European sites (as defined by the *European Communities (Birds and Natural Habitats) Regulations 2011* (as amended)) to undesignated sites (typically those in the early stages of the designation process).

It should also be noted that the European Commission recognises that plans or plan components that are general statements of policy or political aspirations cannot have significant effects. Much of the WSSP (indeed, arguably the whole Plan) would meet this criterion.

2.4 Summary of Approach

2.4.1 Screening

The emerging Plan as a whole has been previously screened to determine whether Appropriate Assessment is required; this screening concluded that the WSSP requires Appropriate Assessment since it is not directly connected with or necessary to the management of a European site; and because the possibility of significant effects on the Natura 2000 network could not be excluded. The screening was undertaken at an early stage in the Plan's development (and therefore without the benefit of draft aims and strategies that could be assessed and modified[9]) but it is accepted that the Plan should be subject to Appropriate Assessment to ensure that the components of the Plan (i.e. the individual aims or strategies) are examined and modified as necessary.

2.4.2 Scope of Assessment

The geographical scope of the assessment is set out in the Screening Report (see **Appendix B**). Since the WSSP covers all of the Republic of Ireland, and may have trans-boundary effects, the screening effectively considers all European sites that occur in the Republic (ROI) and Northern Ireland (NI) (other than those NI sites that are hydrologically separated from the Republic). There are 423 cSACs and 165 SPAs in ROI, with a further 57 SACs, SCIs or cSACs and 16 SPAs in Northern Ireland. The sites and qualifying features are listed in Appendix 1 of the AA Screening Report and so are not repeated in this document.

2.4.3 Appropriate Assessment

The assessment must consider the effects of the Plan on the conservation objectives of those European sites that could be affected. The National Parks and Wildlife Service (NPWS) are in the process of developing conservation objectives for all European sites; these are essentially as follows:

- For SACs, "*To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected*".

[9] It should be noted that Irish case law suggests that avoidance or mitigation measures can (and should) be considered at the screening stage. In a recent (August 2014) preliminary judgment (*Rossmore and Killross v An Bord Pleanála, the State and Eirgrid*) the High Court stated that "*where the mitigating factor in question is an intrinsic part of the work to be carried out it makes no sense* [to not take it into account]". In this the High Court followed the reasoning of an example from UK case law known as the 'Dilly Lane' judgement (*Hart District Council v Secretary of State for Communities and Local Government* [2008] EWHC 1204).

- For SPAs, "*To maintain the bird species of special conservation interest for which the SPA has listed, at favourable conservation status*".

For some sites more detailed targets are provided by which the conservation objectives can be measured.

However, given that the WSSP is not spatially specific and does not direct development to particular areas there is limited merit in undertaking a detailed examination of all European sites, their interest features and their conservation objectives to try and determine which might (in theory) be more or less vulnerable to the imagined outcomes of the Plan. Indeed, this may be counterproductive by creating an unjustified focus on particular European sites and particular features. Therefore, the European sites, interest features and conservation objectives have been referred to during the assessment process for information, but the effects of each strategy are not explicitly assessed on a site-by-site basis.

The assessment of any strategic plan primarily considers the potential outcomes of the individual strategies and policies (in this case, of the WSSP its aims and strategies) and the associated development of measures (generally wording changes) to ensure that significant adverse effects are not a likely outcome of a Plan.

The WSSP aims and strategies may have effects in their own right, or they may be used to control potential effects or prevent them occurring. When considering the likely effects of a strategy or policy, it is recognised that some policy or strategy 'types' cannot result in impacts on any European sites. This can be applied to the emerging Plan or its components to help shape the strategies and identify those aspects requiring further detailed consideration. It can also be used to determine whether more detailed assessment of any strategy or aspect is required. Different guidance documents suggest various classification and referencing systems to help identify those strategies that can be safely assessed as having no effect or no significant adverse effects; the general characteristics of these policy or strategy types are summarised in **Table 2.1**.

Table 2.1 Policy or strategy 'types' that can usually be excluded from further consideration

Broad Type	Notes
General statements of policy / aspiration	The European Commission recognises* that plans or plan components that are general statements of policy or political aspirations cannot have significant effects; for example, general commitments to sustainable development. This would generally include policies which may promote change but where effects on any particular European site cannot be identified, because the proposal is too general (*e.g.* it is not known where, when or how the proposal may be implemented).
General design / guidance criteria or policies that cannot lead to or trigger development	A general 'criteria based' policy expresses the tests or expectations of the plan-making body when it comes to consider proposals, or relates to design or other qualitative criteria which do not themselves lead to development (*e.g.* controls on building design); however, policies with criteria relating to specific proposals or allocations should not be screened out.
External plans / projects	Plans or projects that are proposed by other plans and are referred to in the plan being assessed for completeness (for example, Highways Agency road schemes; specific waste development proposals promoted by a County Minerals and Waste Plan).
Environmental protection policies	Policies designed to protect the natural or built environment will not usually have signifcant or adverse effects (although they may often require modification if relied on to provide sufficient safeguards for other policies).
Policies which make provision for change but which could have no conceivable effect	Policies or proposals which cannot affect a European site (no impact pathways and hence no effect; for example, proposals for new cycle path several kilometres from the nearest European site) or which cannot undermine the conservation objectives, either alone or in combination, if impact pathways exist (no significant effect).

* EC, 2000, Managing Natura 2000 sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC April 2000 at 4.3.2

It must be noted that it is inappropriate to apply a classification tool uncritically. There will obviously be some occasions when a strategy or similar may have potentially significant effects, despite being of a 'type' that would normally be screened out.

The criteria in **Table 2.1** were applied critically to the assessment of the draft strategies within the draft WSSP to identify the following strategy groups:

- '**No effect**' strategies: strategies that will have 'no effect' (i.e. strategies that self-evidently would not have any effect on a European site due to the type of strategy or its operation; for example, a broad strategy directing the preparation of a lower tier plan, which does not compromise or constrain the lower tier plan). Note that 'no effect' strategies cannot have in combination effects.
- '**No significant adverse effect**' strategies: strategies where impact pathways theoretically exist but the effects will not be significant and adverse (alone or in combination).
- '**Uncertain effect**' strategies: strategies where the precise effects on European sites (either alone or in combination) are uncertain, and hence additional investigation through the appropriate assessment stage or policy modification is required (note that further investigation will often demonstrate that there is no significant effect or allow suitable mitigation or avoidance measures to be identified to ensure this).
- '**Likely significant adverse effect**' strategies: strategies which are likely to have a significant effects (either alone or in combination) and hence which require additional investigation or modification. Note that 'likely significant adverse effect' strategies are more likely to require that the strategy be amended, abandoned or re-worked to avoid significant adverse effects.

- '**Cannot be assessed**' strategies: strategies that cannot be meaningfully assessed at this level in the planning hierarchy.

2.4.4 'In combination' Assessment

Article 6(3) of the Habitats Directive requires that the potential effects of the Plan on European sites must also be considered 'in combination with other plans or projects'. The 'in combination' assessment must also consider within-plan effects (i.e. between strategies). The consideration of 'in combination' effects is not a separate assessment, but is integral to the screening and AA stages and the development of avoidance/ mitigation measures. There is limited guidance available on the scope of the 'in combination' element, particularly which plans should be considered. However, the assessment should not necessarily be limited to plans at the same level in the planning hierarchy and there is consequently a wide range of plans that could have potential 'in combination' effects with the WSSP due to its regional scale.

The plans identified by the SEA and the screening report have provided the basis for the assessment of 'in combination' effects; these plans were reviewed to identify any potential effects and these were then considered (as necessary) within the AA. Completion of the 'in combination' assessment is directly related to the strategy wording, and it will often be possible to remove any risk of 'in combination' effects through careful strategy construction.

2.4.5 Mitigation and Avoidance

The development of avoidance or mitigation measures is key to the AA and Plan development process. Avoidance measures are those that are incorporated into the Plan during its development to prevent significant effects on European sites occurring; mitigation measures are used where significant effects are identified in order to prevent adverse effects on a site's integrity.

Avoidance or mitigation measures should aim to reduce the probability or magnitude of impacts on a European site until 'no likely significant effects' are anticipated. These will generally involve the development and adoption of, for example, wording changes or additional strategies. Measures must be specific and targeted, and likely to work: it is not appropriate to re-state existing legislation, such as by adding "*and must have no significant effect on any European site*" (or similar) to every strategy. It should be noted that high-level strategies such as the WSSP often benefit from the use of overarching or cross-cutting protective strategies, particularly where effects cannot be meaningfully assessed at the Plan-level, and lower tier plans are relied on to avoid significant adverse effects.

3. Appropriate Assessment of WSSP Strategies

3.1 Strategy Review

The assessment of the WSSP strategies is summarised in **Table 3.2**. This considers each strategy under each aim, and takes account of any cross-cutting protective strategies and aims (e.g. EN1). This is designed to identify those strategies that are likely to have a significant adverse effect on the Natura 2000 network of European protected sites, and any appropriate mitigation or avoidance measures that may require inclusion in the adopted Plan to avoid this. Recommendations for strategy changes or amendments are made (i.e. to be included in the final, adopted plan) but it should be recognised that these are not intended to be prescriptive and a number of approaches for ensuring 'no significant adverse effects' may be acceptable. The colour coding used in the table is as follows:

Table 3.1 Colour coding for review of strategies

	Cannot be assessed – outcomes of strategy cannot be meaningfully assessed at this level; lower tier assessment required
	No effect – strategies that will have no effect on any European sites (generally no impact pathways, *e.g.* direction to prepare a plan)
	No significant adverse effect (SAE); strategy will not/ cannot affect any Europeansites and so can be excluded from further assessment
	No effect or no SAE, but amendments suggested that may enhance the strategy or plan regards protection of European sites
	Strategy requires changes to avoid significant effects (*e.g.* minor re-wording; referencing mitigating strategies), or effects are uncertain.
	Significant adverse effects likely; strategy should be abandoned or re-worked to include specific mitigation (may apply to policy groups)

Note that the inclusion of a strategy in the 'red' or 'yellow' category does not mean that significant adverse effects are certain and cannot be avoided since in many instances the assessment reflects an uncertainty that may need to be explored through further assessment. For some strategies a more detailed assessment may be required, even if there is some confidence that identified mitigation will be successful in avoiding significant adverse effects, to demonstrate that the potential effects have been suitably considered. The review also included an assessment of 'in combination' effects between strategies.

The likely outcomes of many of the strategies cannot be meaningfully assessed at this level (for example, the effects of Strategy WW1c "*Implement Capital Investment Plans for Wastewater Infrastructure*" are entirely dependent on the content of those lower-tier plans, which have not yet been prepared) and in this instance it is necessary to rely on future assessments of lower-tier plans to ensure that significant adverse effects are avoided. However, it is usually appropriate for the higher-tier plan to ensure (as far as it can) that effects on European sites are explicitly considered during the development of the lower tier plans and strategies; there are a number of approaches to this, but it commonly involves the inclusion of an over-arching policy statement or supporting text that sets out the expectations for the development of lower-tier plans.

Table 3.2 Assessment of draft strategies under each WSSP aim

Strategy and overview		Predicted Effects		Likely outcomes and assessment rationale	Recommendations for strategy
		Alone	In combination*		
Aim CE1 – Establish both Customer Trust and a Reputation for Excellent Service					
CE 1a	Create and operate a lean and effective Customer Operation	No effects	-	This strategy aims to deliver best practice in customer operations. This is a general statement of policy / aspirations and therefore there is no impact pathway.	None
CE1b	Build and maintain accurate customer databases	No effects	-	This strategy aims to ensure accurate customer services and billing; it is a general statement of policy / aspirations and therefore there is no impact pathway.	None
CE 1c	Establish sustainable customer revenue	No effects	-	This strategy aims to secure funding necessary to deliver efficient and effective water services; it is a general statement of policy / aspirations and therefore there is no impact pathway.	None
CE1d	Establish effective communication channels with customers	No effects	-	This strategy aims to develop a Customer Communication Strategy; it is a general statement of policy / aspirations and therefore there is no impact pathway.	None
CE1e	Establish national customer service standards and robust customer protection measures	No effects	-	This strategy aims to develop appropriate customer expectation and deliver to these; it is a general statement of policy / aspirations and therefore there is no impact pathway.	None
CE1f	Fully support the work of the Public Water Forum	No effects	-	This strategy aims to address the comments and suggestions of the Public Water Forum in relation to the performance by Irish Water of its functions; it is a general statement of policy / aspirations and therefore there is no impact pathway.	None

Strategy and overview		Predicted Effects		Likely outcomes and assessment rationale	Recommendations for strategy
		Alone	In combination*		
Aim WS1 – Manage the quality of drinking water from source to tap to protect human health					
WS1a	Prepare a National Water Resources Plan and implement on a phased basis	No effect	-	Strategy requires the preparation and implementation of a National Water Resources Plan (NWRP); the direction to prepare a Plan would not in itself lead to any effects (no impact pathway), and the NWRP will be subject to Appropriate Assessment during its development. The WSSP does not constrain how the NWRP is drafted or implemented, and therefore the WSSP cannot have significant effects (although the outcomes of the lower tier Plan could conceivably affect European sites). Any risk of effects can be avoided through overarching strategy setting out the expectations for the NWRP.	Strategy safeguards can be introduced to the WSSP to specify that Appropriate Assessment of lower tier plans will be required, and that these will not be considered compliant with the WSSP if significant adverse effects on European sites are not avoided or suitably mitigated; this can be addressed in the supporting text to EN1e (see Section 3.3).
WS1b	Prepare and implement Drinking Water Safety Plans for all Water Supply Zones.	No effect	-	Strategy requires the preparation and implementation of Drinking Water Safety Plans (DWSP); these will be used to assess risks to safety within the drinking water system and may result in capital investment or other measures to address these risks. The direction to prepare and implement a plan would not in itself lead to any effects (no impact pathway), and the DWSP is also unlikely to result in significant effects (identifying quality problems and investment needs does not constrain how those quality issues are addressed). The WSSP does not constrain how the DWSP is drafted or implemented, and therefore the WSSP cannot have any effects.	
WS1c	Implement Standard Operational Procedures for all water treatment plants, water storage facilities and distribution networks.	No effect	-	The direction to prepare and implement a Best Practice Guidelines or Standard Operations Procedures (SOPs) would not in itself lead to any effects (no impact pathway); the effects will ultimately depend on the Best Practice Guidance and Standard Operational Procedures themselves, and the extent to which European sites are safeguarded by the operational procedures. This can only be determined at the guidance / SOP level, although any risk of effects can be avoided through overarching strategy setting out the expectations for the SOPs.	Any risk of effects due to the lower tier Plans can be avoided through an overarching strategy setting out the expectations and requirements for lower tier Plans regards European sites; this can be addressed in the supporting text to EN1e (see Section 3.3)
WS1d	Develop and Implement Capital Investment Plans to improve Drinking Water Quality.	No effects	-	Strategy requires the preparation and implementation of Capital Investment Plans (CIP); these will provide a prioritised list of programmes and projects for targeted investment, aimed at (inter alia) improving compliance with Drinking Water Standards. The direction to prepare and implement a plan would not in itself lead to any effects (no impact pathway), and identifying investment needs does not constrain how those quality issues are addressed.	Any risk of effects due to the lower tier Plans can be avoided through an overarching strategy setting out the expectations and requirements for lower tier Plans regards European sites; this can be addressed in the supporting text to EN1e (see Section 3.3).

Strategy and overview		Predicted Effects		Likely outcomes and assessment rationale	Recommendations for strategy
		Alone	In combination*		
WS1e	Prepare and implement a 'Lead Compliance Strategy'	No effects	-	Strategy requires the preparation and implementation of a Lead Strategy to address plumbo-solvency issues and potential contamination of supplies. As before, the direction to prepare and implement a Plan would not in itself lead to any effects (no impact pathway).	None
WS1f	Prepare and implement strategies to manage other quality issues in water supplies.	No effects	-	As for WS1e (direction to prepare and implement a Plan would not in itself lead to any effects (no impact pathway)).	None

Strategy and overview		Predicted Effects		Likely outcomes and assessment rationale	Recommendations for strategy
		Alone	In combination*		
Aim WS 2 – Manage the availability and resilience of water supply now and into the future					
WS2a	Implement risk assessments for all water supply areas in terms of short, medium and long term risks to customer supply.	No effect	-	Strategy requires the preparation of supply risk assessments to identify areas where supply improvements may be required to meet service standards. The direction to prepare a risk assessment would not in itself lead to any effects (no impact pathway), and identifying areas requiring service improvement does not constrain how those improvements are addressed.	None
WS2b	Manage existing water resources and plan for new resources taking a regional view of needs and having regard to the objectives of the Water Framework Directive (WFD).	No significant adverse effect	No significant adverse effect	Managing water resources sustainably to help meet the WFD objectives will ultimately benefit European sites.	None.
WS2c	Develop long-term sustainable water sources with resilience to climate change.	No significant adverse effect	No significant adverse effect	Development of water resources could theoretically affect European sites although this can only be meaningfully assessed at the lower tier plans and projects when specific locations or sources are known; the commitment to 'sustainable' sources minimises the risk of effects, and any risk of effects due to the lower tier plans and projects can be avoided through an overarching strategy setting out the expectations and requirements for lower tier plans and projects regards European sites. The strategy does not constrain the outcome or dictate how sustainable water sources may be delivered.	Ensure that 'sustainable' is defined in the WSSP, and that this definition includes reference to having no significant adverse effects on European sites.
WS2d	Develop methodologies to build strategic resilience and network connectivity into resource planning.	No effect	-	Strategy requires the development of methods; the direction to prepare these would not in itself lead to any effects (no impact pathway), Introducing strategic resilience and network connectivity could theoretically affect European sites although this can only be meaningfully assessed at the lower tiers when specific locations or proposals are known. Any risk of effects due to the lower tier plans and projects can be avoided through an overarching strategy setting out the expectations and requirements for lower tier plans and projects regards European sites.	None.
WS2e	Manage future regulatory requirements for abstraction licencing, headroom in treatment facilities and population growth.	No effect	-	Strategy essentially requires the development of integrated water resources planning; the direction to prepare these would not in itself lead to any effects (no impact pathway), and the WSSP does not constrain how these strategies/plans might be delivered.	Any risk of effects due to the lower tier Plans can be avoided through an overarching strategy setting out the expectations and requirements for lower tier Plans regards European sites; this can be addressed in the supporting text to EN1e.

Strategy and overview		Predicted Effects		Likely outcomes and assessment rationale	Recommendations for strategy
		Alone	In combination*		
WS2f	Match water abstraction to availability and quality using surface water and groundwater sources. This is known as Conjunctive Use.	No effect	-	Strategy essentially requires the development of integrated water resources planning; the direction to prepare these water abstraction strategies would not in itself lead to any effects (no impact pathway), and the WSSP does not constrain how these strategies might be delivered. Any risk of effects due to the lower tier strategies or plans can be avoided through overarching strategy setting out the expectations and requirements for lower tier strategies/plans regarding European sites.	Any risk of effects due to the lower tier strategies or plans can be avoided through overarching strategy setting out the expectations and requirements for lower tier strategies/plans regarding European sites
WS2g	Prepare Regional Water Conservation Strategies and implement on a phased basis	No effect	-	Requires production of strategies to reduce demand; likely to have a positive effect on European sites, but the direction to prepare strategies would not in itself lead to any effects (no impact pathway), and identifying areas requiring service improvement does not constrain how those improvements are addressed.	None.

Strategy and overview		Predicted Effects		Likely outcomes and assessment rationale	Recommendations for strategy
		Alone	In combination*		
Aim WS 3 – Manage the affordability of water supplies					-
WS3a	Adopt an asset management based approach to capital maintenance and capital investment.	No effect	-	This strategy relates to asset management procedures, particularly improving the knowledge of assets through planned National Data Gathering and Asset Condition Exercises; this will allow for maintenance etc. requirements to be identified at an early stage and appropriate capital investment decisions made. This is not likely to have an effect on any European sites.	None.
WS3b	Optimise the unit cost of water supply through proper water resource and treatment planning.	No effect	-	Minimising the unit cost of delivering water to the customer whilst meeting environmental compliance will result in the rationalisation of water supply areas over time and, subject to funding ability, will focus on a smaller number of sustainable sources, standardising treatment processes and using high quality raw water sources. This rationalisation approach will be developed within the National Water Resources Plan by the end of 2018. The strategy requires the preparation and implementation of a National Water Resources Plan (NWRP); the direction to prepare a Plan would not in itself lead to any effects (no impact pathway), and the NWRP will be subject to Appropriate Assessment during its development. The strategy is likely to ultimately reduce abstraction pressure on some European sites.	None
WS3c	Prepare and implement water conservation strategies including demand management.	No significant adverse effect	No significant adverse effect	Effects on European sites would depend on implementation, which cannot be meaningfully identified or assessed at this level. Any risk of effects due to the lower tier strategies can be avoided through an overarching strategy setting out the expectations and requirements for lower tier strategies regard European sites. However, water conservation strategies would generally be expected to benefit European sites.	None.
WS3d	Optimise capital and operational investments in water supply.	Cannot be meaningfully assessed	-	The strategy promotes the development of robust cost benefit analysis models and prioritization models for works and strategies, agreed to by the regulators (the CER and the EPA). In theory an effect is possible if investments are prioritised purely on a least-cost model; although, regulation by the EPA can be relied on to ensure that effects on European sites are appropriately considered. Effects of strategy cannot be meaningfully assessed.	Strategy could usefully be strengthened by referencing the need to consider impacts on Natura 2000 sites as part of the cost-benefit analysis (rather than solely economic drivers).

Strategy and overview		Predicted Effects		Likely outcomes and assessment rationale	Recommendations for strategy
		Alone	In combination*		
Aim WW1 – Manage the operation of wastewater facilities in a manner that protects environmental quality					
WW1a	Prepare and implement a Wastewater Compliance Strategy.	Cannot be meaningfully assessed	-	The Wastewater Compliance Strategy has not yet been drafted and therefore the strategy cannot be meaningfully assessed at this level.	Any risk of effects due to the lower tier Plans can be avoided through an overarching strategy setting out the expectations and requirements for lower tier Plans regards European sites; this can be addressed in the supporting text to EN1e (see Section 3.3).
WW1b	Produce appropriate guidance documentation and Standard Operating Procedures.	No effect		The direction to prepare and implement a Best Practice Guidelines or Standard Operations Procedures (SOPs) would not in itself lead to any effects (no impact pathway); the effects will ultimately depend on the Best Practice Guidance and Standard Operational Procedures themselves, and the extent to which European sites are safeguarded by the operational procedures. This can only be determined at the guidance / SOP level, although any risk of effects can be avoided through overarching strategy setting out the expectations for the SOPs.	None.
WW1c	Develop and implement Capital Investment Plans on a prioritised basis to progressively achieve compliance.	Cannot be meaningfully assessed	-	These plans target capital investment to progressively achieve compliance, starting with the basic Urban Wastewater Treatment Directive requirements, progressing to Emission Level Value requirements arising from the implementation of the Water Framework Directive; this will ultimately have positive effects on European sites although individual schemes may still have negative effects that require addressing. The strategy cannot be meaningfully assessed at this level.	Any risk of effects due to the lower tier Plans can be avoided through an overarching strategy setting out the expectations and requirements for lower tier Plans regards European sites; this can be addressed in the supporting text to EN1e (see Section 3.3).
WW1d	Manage the wider potential environmental impacts associated with the construction and operation of wastewater systems	No significant effect	No significant effect	This is effectively a protective strategy which will include protection of European sites; there is no impact pathway for effects as a result of this strategy although it could usefully be strengthened by referencing the need to consider impacts on Natura 2000 sites.	Strategy could usefully be strengthened by referencing the need to prevent adverse effects on Natura 2000 sites (rather than simply managing impacts); this can be addressed in the supporting text to EN1e.

Strategy and overview		Predicted Effects		Likely outcomes and assessment rationale	Recommendations for strategy
		Alone	In combination*		
Aim WW2 – Manage the availability and resilience of wastewater services now and into the future					
WW2a	Implement risk assessments for all agglomerations in terms of short, medium and long term risks to customer service	No effect	-	Strategy requires the preparation of risk assessments to identify areas where improvements may be required to meet service standards or to comply with environmental legislation. The direction to prepare a risk assessment would not in itself lead to any effects (no impact pathway), and identifying assets (etc.) requiring improvement does not constrain how those improvements are addressed.	None.
WW2b	Manage existing wastewater assets and plan for new assets based on short, medium and long term sustainability.	Cannot be meaningfully assessed	-	Strategy aims to maintain service levels while having regard to requirements under the Water Framework Directive; planning water treatment services will ultimately have positive effects on European sites although individual schemes may still have negative effects that require addressing. The strategy cannot be meaningfully assessed at this level and any risk of effects due to the lower tier plans or projects can be avoided through an overarching strategy setting out the expectations and requirements for lower tier plans and projects regard European sites.	None.
WW2c	Identify properties at risk of flooding from combined sewers, and implement measures to reduce risk on a phased basis	Cannot be meaningfully assessed	-	Identifying properties at risk of CSO flooding will not in itself have any effects; implementing measures to reduce risk may affect European sites depending on the proposals, although this cannot be meaningfully assessed at this level.	Any risk of effects due to the lower tier Plans can be avoided through an overarching strategy setting out the expectations and requirements for lower tier Plans regards European sites; this can be addressed in the supporting text to EN1e.
WW2d	Identify and manage critical wastewater assets.	Cannot be meaningfully assessed	-	Identifying critical assets will not in itself have any effects; managing these could have operational effects but this will be controlled by existing permitting regimes and the effects of this cannot be meaningfully assessed at this level.	None.

Strategy and overview		Predicted Effects		Likely outcomes and assessment rationale	Recommendations for strategy
		Alone	In combination*		
Aim WW3 - Manage the Affordability and Reliability of Wastewater Services					
WW3a	Adopt an Asset Management Based Approach to capital maintenance and capital investment.	No effect	-	This strategy relates to asset management procedures, particularly improving the knowledge of assets through planned National Data Gathering and Asset Condition Exercises; this will allow for maintenance etc. requirements to be identified at an early stage and appropriate capital investment decisions made. This is not likely to have an effect on any European sites.	None.
WW3b	Develop and implement strategies and standards to minimise the unit costs of wastewater treatment including standardising treatment processes.	No effect	-	Strategy encourages standardisation of treatment processes; effects of this depend on the standard processes adopted but it is reasonable to assume that any outputs will comply with the relevant legislation including the Habitats Directive. Managing these could have operational effects but this will be controlled by existing permitting regimes.	None.
WW3c	Optimise energy consumption in wastewater treatment plants and collection systems.	Cannot be meaningfully assessed		Aims to reduce energy consumption; will have no effects that can be meaningfully assessed at this level.	None.
WW3d	Ensure adequate governance and control of discharges to the sewer network, having regard for best practice and value.	No significant adverse effect	No significant adverse effect	Ensuring that discharges to the sewer network (i.e. inputs to the treatment system) are controlled will not negatively affect European sites and may have a positive effect as assets are safeguarded from damage etc.	None.
WW3e	Engage with regulators and stakeholders.	No effect	-	Engagement with stakeholders cannot in itself have an effect.	None.
WW3f	Optimise capital and operational investments in wastewater services.	Cannot be meaningfully assessed		The strategy promotes the optimisation of expenditure to minimise costs to the customer whilst remaining compliant with the relevant legislation. Compliance will ensure that significant effects do not occur, taking into account the improvements that are required to meet various directives. Note, strategy cannot be meaningfully assessed at this level.	None.

Strategy and overview		Predicted Effects		Likely outcomes and assessment rationale	Recommendations for strategy
		Alone	**In combination***		
Aim EN1 – Ensure that Irish Water services are delivered in a sustainable manner which contributes to the protection of the environment					
EN1a	Implement a Sustainability Policy and Sustainability Framework	No effect	-	Strategy aims to ensure that Irish Water services are delivered in a sustainable manner balancing the need for water services to support the social and economic development of the country with the need to protect water resources and the water environment in the face of changing climate and extreme weather events. The adoption of a sustainability policy will not negatively affect any European sites.	None.
EN1b	Prepare and implement a Sustainable Energy Strategy.	No effects	-	As above.	None.
EN1c	Prepare and implement a climate change adaptation and mitigation strategy.	No effects	-	Strategy requires the preparation of a climate change strategy; the direction to prepare this would not in itself lead to any effects (no impact pathway), and outcomes of the strategy cannot be assessed at this level.	The strategy could be usefully strengthened to emphasise the key role that IW will play in preventing or mitigating effects on some European sites as a consequence of climate change, for example: "*Our strategy will address the vulnerability of water services* ***and the associated environment (including protected sites)*** *to climate change and identify actions to modify our infrastructure or operations*"
EN1d	Adopt a Green Procurement Approach and drive efficient use of all our resources.	No effects	-	Aims to ensure that resources are utilised efficiently; the adoption of a green procurement approach would not in itself lead to any effects (no impact pathway).	None.
EN1e	Adhere to environmental and planning legislation when planning and developing water services assets.	No significant adverse effect	No significant adverse effect	Adhering to environmental and planning legislation will include adherence to the Habitats Directive, and therefore will have no significant adverse effect.	None.

Strategy and overview		Predicted Effects		Likely outcomes and assessment rationale	Recommendations for strategy
		Alone	In combination*		
Aim EN2 - Operate our water services infrastructure to support the achievement of water body objectives under the Water Framework Directive					
EN2a	Work effectively with other stakeholders to support a catchment based approach to water management.	No effect		Engagement with stakeholders cannot in itself have an effect.	None.
EN2b	Manage the operation of our water and wastewater infrastructure towards the achievement of water body objectives	No significant adverse effect	No significant adverse effect	Managing water resources sustainably to help meet the WFD objectives will ultimately benefit European sites.	None.
Aim EN3 – Manage all our Residual Waste in a Sustainable Manner					
EN3a	Develop and implement a Corporate Waste Management Strategy.	No effects	-	The direction to prepare a waste management strategy would not in itself lead to any effects (no impact pathway).	Any risk of effects due to this lower tier strategy can be avoided through overarching strategy setting out the expectations and requirements for lower tier plans, strategies and projects regards European sites; this can be addressed in the supporting text to EN1e.
EN3b	Develop and implement a National Wastewater Sludge Strategy.	No effects	-	The direction to prepare a wastewater sludge strategy would not in itself lead to any effects (no impact pathway).	Any risk of effects due to this lower tier strategy can be avoided through overarching strategy setting out the expectations and requirements for lower tier plans, strategies and projects regards European sites; this can be addressed in the supporting text to EN1e.
EN3c	Develop and implement a National Water Sludge Strategy.	No effects	-	The direction to prepare a water sludge strategy would not in itself lead to any effects (no impact pathway).	Any risk of effects due to this lower tier strategy can be avoided through overarching strategy setting out the expectations and requirements for lower tier plans, strategies and projects regards European sites; this can be addressed in the supporting text to EN1e.

Strategy and overview		Predicted Effects		Likely outcomes and assessment rationale	Recommendations for strategy
		Alone	In combination*		
Aim SG1 - Support National, Regional and Local Economic and Spatial Planning Policy					
SG1a	Work with national, regional and local bodies and potential customers to anticipate and plan water services for growth in line with the statutory planning process.	No effect	-	Engagement with stakeholders cannot in itself have an effect; early planning of water services reduces the likelihood of significant effects occurring.	None.
Aim SG2 - Facilitate growth in line with national and regional economic and spatial planning policy					
SG2a	Maximise capacity of existing assets through effective asset management and optimised operation.	Cannot be meaningfully assessed	-	Maximising capacity will minimise the requirements for new infrastructure, which in most cases will ensure that significant effects on particular sites do not occur; however, there may be some instances where this is not appropriate, although these cannot be meaningfully identified or assessed at this level.	It is recommended that the strategy acknowldges that maximising capacity may not be appropriate in all instances, for example "*maximise capacity where appropriate*..."
SG2b	Plan water service infrastructure at national, regional and river basin level.	No significant adverse effect	No significant adverse effect	Planning water services at national, regional and river basin levels will not negatively affect European sites and is likely to result in benefits for some sites due to improved integration of catchment strategies.	None.
SG2c	Invest in the development of strategic networks and treatment works.	Cannot be meaningfully assessed	-	Strategic networks will ultimately reduce pressure on European sites as the system becomes more resilient and integrated; developing those networks may affect European sites during development, but this cannot be meaningfully assessed at this level; this can be addressed in the supporting text to EN1e.	None.
SG2d	Maintain appropriate headroom in strategic water services infrastructure.	Cannot be meaningfully assessed	-	Statement of best-practice; strategic networks will ultimately reduce pressure on European sites as the system becomes more resilient and integrated; developing those networks may affect European sites during development, but this cannot be meaningfully assessed at this level; this can be addressed in the supporting text to EN1e.	Any risk of effects due to this lower tier strategy can be avoided through overarching strategy setting out the expectations and requirements for lower tier plans, strategies and projects regards European sites; this can be addressed in the supporting text to EN1e.
SG2e	Provide a high quality customer service for new customers.	No effect	-	This strategy is a customer service commitment; it is a general statement of policy / aspirations and therefore there is no impact pathway and no effect.	None.

Strategy and overview		Predicted Effects		Likely outcomes and assessment rationale	Recommendations for strategy
		Alone	In combination*		
Aim SG3 - Ensure that water services are provided in a timely and cost effective manner					
SG3a	Plan for water services infrastructure development to meet projected demand facilitating delivery on a phased basis	Cannot be meaningfully assessed	-	Statement of best-practice; planning water services to meet projected demand will minimise the risk of impacts on European sites; meeting demand growth may ultimately affect some European sites during asset development, but this cannot be meaningfully assessed at this level; this can be addressed in the supporting text to EN1e.	Any risk of effects due to this lower tier strategy can be avoided through overarching strategy setting out the expectations and requirements for lower tier plans, strategies and projects regards European sites; this can be addressed in the supporting text to EN1e.
SG3b	Balance investment for growth in demand with affordability.	No effect	-	This strategy aims to ensure affordability to customers is paramount over investment in additional capacity, and that minimum cost to customers is ensured by providing capacity only when the demand is likely to be realised. One of the drivers for additional capacity (new sources or new treatment works, for example) will be the need to ensure regulatory compliance, and that European sites are not affected, and so the strategy in itself is neutral and will have no effects. However, it is important that this strategy is integrated closely with other planning aspects to ensure that the provision of additional water services (particularly wastewater treatment) is timely and delivered ahead of need.	Strategy supporting text could clarify the importance of environment as a factor in investment and ensuring that additional capacity is delivered in a timely manner to prevent significant effects on European sites occuring as a result of unexpected or unplanned growth. e.g. "*We are required to operate in a commercially viable **and environmentally responsible** manner and must take this into consideration when considering priorities for investment."*
SG3c	Operate an equitable New Connections Charging Policy that ensures efficient service provision to new customers with full cost recovery on a least cost basis.	No effect.	-	This strategy relates to the connections policy; it is a general statement of policy / aspirations and so there is no impact pathway and no effect.	None.

Strategy and overview		Predicted Effects		Likely outcomes and assessment rationale	Recommendations for strategy
		Alone	In combination*		
Aim IF1: Asset Management - Manage our assets and investments in accordance with best practice asset management principles to deliver a high quality secure and sustainable service at lowest cost.					
IF1a	Implement asset management systems including comprehensive asset data collection and modelling tools.	No effect	-	Commitment to introduce formalised asset management systems and data collection; no impact pathway.	None.
IF1b	Develop long term asset strategies and implementation plans (Tier 2 Plans).	No effect	-	Irish Water will develop a series of implementation plans defining the programmes of work to be implemented. These plans will develop the range of scenarios and options from which the optimum approaches and prioritisation will be determined. These Plans will take full account of the asset standards and policies adopted by Irish Water in shaping the strategic solutions. Where required, these plans will be subjected to Strategic Environmental Assessment and Appropriate Assessment, including public consultation. The direction to prepare a plan would not in itself lead to any effects (no impact pathway). The WSSP does not constrain how the lower tier plans are drafted or implemented, and therefore the WSSP cannot have significant effects. Any risk of effects can be avoided through an overarching strategy setting out the expectations for the lower tier plans.	None.
IF1c	Development of initiatives such as asset standards and improved supply chain management.	No effect	-	Promotes general management good practice and innovation; general statement of policy; no impact pathways	None.

Strategy and overview		Predicted Effects		Likely outcomes and assessment rationale	Recommendations for strategy
		Alone	In combination*		
Aim IF2: Balanced Sustainable Investment - Invest in our assets while maintaining a sustainable balance between the interests of our customers, the environment and the need to support the economic development and growth of the country.					
IF2a	Engage with our customers, including households, commercial and industrial customers.	No effect	-	No impact pathway: strategy for customer engagement will not affect any European sites.	None.
IF2b	Engage collaboratively with key stakeholders including CER, EPA, HSE, DECLG, regional and local authorities.	No effect	-	No impact pathway: strategy for engaging with stakeholders cannot in itself have an effect; early planning of water services reduces the likelihood of significant effects occurring.	None.
IF2c	Apply clear and transparent investment prioritisation criteria.	No effect	-	This strategy aims to apply transparent criteria for investment; this has no impact pathway and cannot in itself have an effect.	None
Aim IF3: Sustainable Funding Model - Establish a sustainable funding model to ensure that Irish Water can deliver the required capital investment in order to maintain critical assets and achieve the required outcomes for our customers, the environment and the national economy.					
IF3a	Transform the water industry in Ireland to an efficient water utility model within a regulated framework.	No effect	-	No impact pathway; strategy requires development of a business model that ensures that IW can deliver the capital investment required to achieve the necessary outcomes for our customers, the environment and the national economy; development of business model cannot have an effect.	None.
IF3b	Work with regulators to achieve optimum balance of affordability and service standards taking into account regulatory requirements.	No effect	-	Strategy for engaging with regulators cannot in itself have an effect; strategy reflects need to take into account regulatory requirements.	None.
IF3c	Deliver on Irish Water's commitments to raise public awareness of the value of water and achievements delivered..	No effect	-	No impact pathway. Strategy aims to achieve best value for money from investment decisions.	None.

Strategy and overview		Predicted Effects		Likely outcomes and assessment rationale	Recommendations for strategy
		Alone	In combination*		
Aim IF4: Research and Innovation. Promote research and proven, innovative technical solutions.					
IF4a	Actively pursue research and development in water services and track opportunities to develop and adopt new technologies.	No effect	-	No impact pathway; promoting Research and Development cannot in itself have an effect.	None.
IF4b	Engage effectively with universities, Institutes of Further Education, colleges and industry.	No effect	-	No impact pathway.	None
IF4c	Develop knowledge management capability and implementation processes.	No effect	-	No impact pathway.	None.

* Within plan in combination effects with other strategies

3.2 Between-plan 'In Combination' Effects

The screening identified a number of policies, plans and programmes that could theoretically operate 'in combination' with the WSSP to affect European sites (see Section 2.8 of the AA screening document in **Appendix B** attached). These included a number of European directives. The potential for these plans and programmes, and additional plans identified by the SEA (see Section 4.4.2 of the SEA Environmental Report), to operate 'in combination' was considered.

In summary, it is not possible to undertake a meaningful 'in combination' assessment due to the multiple uncertainties that exist regards the outcomes of the WSSP and most of the 'in combination' plans (most are not spatially-specific and so effects on particular European sites cannot be identified or assessed; those that do have a spatial element (e.g. the Greater Dublin Strategic Drainage Strategy) will not constrain how the principles of the WSSP are delivered (or vice versa). As a result, it is recommended that the WSSP contain over-arching or cross-cutting strategies that provide certainty that plans or projects derived from it will not have significant adverse 'in combination' effects (see **Section 3.3** below).

3.3 Conclusions

The assessment of the WSSP strategies has demonstrated the following points.

- 49 of 68 strategies will have 'no effect' on any European sites (and therefore no 'in combination' effects either). The majority of these are directions to prepare lower-tier plans or undertake activities that are themselves likely to be neutral in their effects (e.g. engage with stakeholders; operate an equitable New Connections Charging Policy; etc.).

- 12 strategies cannot be meaningfully assessed at this level (e.g. the strategies contain elements that could ultimately result in significant effects on a European site, depending on future implementation, but is too unspecific to allow assessment). In these instances it is suggested that the WSSP explicitly states that screening for AA should be undertaken for all lower-tier plans, strategies and projects derived from the WSSP, and that these plans, strategies and projects should (as part of the their remit) ensure that they do not have significant adverse effects on any European sites.

- 7 strategies will have 'no significant adverse effect'. These are generally strategies that commit to environmental protection or other compliance (e.g. with the WFD) that are likely to have a positive effect on European sites (i.e. there will be an effect but it will not undermine any site's conservation objectives).

Some individual strategies could be strengthened by reference to the protection of European sites; however, inclusion of an overarching environmental protection strategy and supporting text (e.g. Aim EN1 and Strategy EN1e) that is specific to European sites will provide an appropriate safeguard to ensure that the delivery of the WSSP will not adversely affect any European sites, particularly where assessment is not possible at this level in the hierarchy. The following strategy amendments are recommended:

- **Supporting text to EN1c:** "*Our strategy will address the vulnerability of water services **and the associated environment (including protected sites)** to climate change and identify actions to modify our infrastructure or operations*".

- **Supporting text to EN1e**: "*Safeguarding Ireland's environmental assets will be central to all strategies, plans or projects derived from the WSSP, and to our activities and operations. In particular, all lower-tier strategies, plans or projects derived from the WSSP will, during their development, be screened for their potential to affect European sites, and must not have significant adverse effects on any such site, alone or in combination with other plans or projects. Lower-tier plans, strategies or projects that are likely to have significant adverse effects will not be considered compliant with the WSSP. The consideration of potential effects on European sites will be a fundament component of the plan development*".

- **Supporting text to SG3b**: "*We are required to operate in a commercially viable **and environmentally responsible** manner and must take this into consideration when considering priorities for investment."*

- **Strategy SG2a**: "*Maximise capacity of existing assets through effective asset management and optimised operation, **where appropriate taking into account environmental factors***".

It is also recommended that 'sustainable' be defined within the WSSP, with this definition including reference to the safeguarding of European sites.

Assuming that these minor changes (or similar) are made, it is considered that the WSSP will have no significant adverse effects on any European sites, alone or 'in combination' with other plans and programmes. This conclusion does not remove the need for screening any other plans, strategies or projects, or permissions associated with, or arising from the Plan. Acceptance that the Plan is consistent, so far as can be ascertained, with the Habitats Directive and Regulations does not guarantee that any Tier 2 plans or strategies or Tier 3 projects derived from the Plan will also be found consistent when taken forward. The WSSP will be subject to monitoring and performance testing, and a formal five-year review cycle, which will allow for strategy adjustments to ensure (*inter alia*) the long-term compliance with the Habitats Directive and Regulations.

Appendix A
Draft WSSP Strategic Objectives, Aims and Strategies

Table A.1 Draft WSSP Strategies

Aim	Strategy
Meet Customer Expectations	
Aim CE1: Establish both Customer Trust and a Reputation for Excellent Service.	• CE1a: Create and operate a lean and effective Customer Operation. • CE1b: Build and maintain accurate customer databases. • CE1c: Establish sustainable customer revenue. • CE1d: Establish effective communication channels with customers. • CE1e: Establish national customer service standards and robust customer protection measures. • CE1f: Fully support the work of the Public Water Forum.
Ensure a Safe and Reliable Water Supply	
Aim WS1: Manage the quality of drinking water from source to tap to protect human health.	• WS1a: Prepare a National Water Resources Plan and implement on a phased basis. • WS1b: Prepare and implement Drinking Water Safety Plans for all Water Supply Zones. • WS1c: Implement Standard Operational Procedures for all water treatment plants, water storage facilities and distribution networks. • WS1d: Develop and Implement Capital Investment Plans to improve Drinking Water Quality. • WS1e: Prepare and implement a “Lead Compliance Strategy”. • WS1f: Prepare and implement strategies to manage other quality issues in water supplies.
Aim WS 2: Manage the availability and reliability of water supply now and into the future.	• WS2a: Implement risk assessments for all water supply areas in terms of short, medium and long term risks to customer supply. • WS2b: Manage existing water resources and plan for new resources taking a regional view of needs and having regard to the objectives of the Water Framework Directive (WFD). • WS2c: Develop long-term sustainable water sources with resilience to climate change. • WS2d: Develop methodologies to build strategic resilience and network connectivity into resource planning. • WS2e: Manage future regulatory requirements for abstraction licencing, headroom in treatment facilities and population growth. • WS2f: Match water abstraction to availability and quality using surface water and groundwater sources. This is known as Conjunctive Use. • WS2g: Prepare Regional Water Conservation Strategies and implement on a phased basis.
Aim WS3: Manage the affordability of water supplies.	• WS3a: Adopt an asset management based approach to capital maintenance and capital investment. • WS3b: Optimise the unit cost of water supply through proper water resource and treatment planning. • WS3c: Prepare and implement water conservation strategies including demand management. • WS3d: Optimise capital and operational investments in water supply.
Provide Effective Management of Wastewater	

Aim	Strategy
Aim WW1: Manage the operation of wastewater facilities in a manner that protects environmental quality.	• WW1a: Prepare and implement a Wastewater Compliance Strategy. • WW1b: Produce appropriate guidance documentation and Standard Operating Procedures. • WW1c: Develop and implement Capital Investment Plans on a prioritised basis to progressively achieve compliance. • WW1d: Manage the wider potential environmental impacts associated with the construction and operation of wastewater systems.
Aim WW2: Manage the availability and resilience of wastewater services now and into the future.	• WW2a: Implement risk assessments for all agglomerations in terms of short, medium and long term risks to customer service. • WW2b: Manage existing wastewater assets and plan for new assets based on short, medium and long term sustainability. • WW2c: Identify properties at risk of flooding from combined sewers, and implement measures to reduce risk on a phased basis. • WW2d: Identify and manage critical wastewater assets.
Aim WW3: Manage the Affordability and Reliability of Wastewater Services.	• WW3a: Adopt an asset management based approach to capital maintenance and capital investment. • WW3b: Develop and implement strategies and standards to minimise the unit costs of wastewater treatment including standardising treatment processes. • WW3c: Optimise energy consumption in wastewater treatment plants and collection systems. • WW3d: Ensure adequate governance and control of discharges to the sewer network, having regard for best practice and value. • WW3e: Engage with regulators and stakeholders. • WW3f: Optimise capital and operational investments in wastewater services.
Protect and Enhance the Environment	
Aim EN1: Ensure that Irish Water services are delivered in a sustainable manner which contributes to the protection of the environment.	• EN1a: Implement a Sustainability Policy and Sustainability Framework. • EN1b: Prepare and implement a Sustainable Energy Strategy. • EN1c: Prepare and implement a Climate Change Adaptation and Mitigation Strategy. • EN1d: Adopt a Green Procurement Approach and drive efficient use of all our resources. • EN1e: Adhere to environmental and planning legislation when planning and developing water services assets.
Aim EN2: Operate our water services infrastructure to support the achievement of water body objectives under the Water Framework Directive.	• EN2a: Work effectively with other stakeholders to support a catchment based approach to water management. • EN2b: Manage the operation of our water and wastewater infrastructure towards the achievement of water body objectives.
Aim EN3: Manage all our Residual Waste in a Sustainable Manner.	• EN3a: Develop and implement a Corporate Waste Management Strategy. • EN3b: Develop and implement a National Wastewater Sludge Strategy. • EN3c: Develop and implement a National Water Sludge Strategy.
Support Social and Economic Growth	
Aim SG1: Support National, Regional and Local Economic and Spatial Planning Policy.	• SG1a: Work with national, regional and local bodies and potential customers to anticipate and plan water services for growth in line with the statutory planning process.
Aim SG2: Facilitate growth in line with national and regional economic and spatial planning policy.	• SG2a: Maximise capacity of existing assets through effective asset management and optimised operation. • SG2b: Plan water service infrastructure at national, regional and river basin level. • SG2c: Invest in the development of strategic networks and treatment works. • SG2d: Maintain appropriate headroom in strategic water services infrastructure. • SG2e: Provide a high quality customer service for new customers.

Aim	Strategy
Aim SG3: Ensure that water services are provided in a timely and cost effective manner.	• SG3a: Plan for water services infrastructure development to meet projected demand facilitating delivery on a phased basis. • SG3b: Balance investment for growth in demand with affordability. • SG3c: Operate an equitable New Connections Charging Policy that ensures efficient service provision to new customers with full cost recovery on a least cost basis.
Invest in Our Future	
Aim IF1: Asset Management - Manage our assets and investments in accordance with best practice asset management principles to deliver a high quality secure and sustainable service at lowest cost.	• IF1a: Implement asset management systems including comprehensive asset data collection and modelling tools. • IF2b: Develop long term asset strategies and implementation plans (Tier 2 Plans). • IF2c: Development of initiatives such as asset standards and improved supply chain management.
Aim IF2: Balanced Sustainable Investment - Invest in our assets while maintaining a sustainable balance between the interests of our customers, the environment and the need to support the economic development and growth of the country.	• IF2a: Engage with our customers, including households, commercial and industrial customers. • IF2b: Engage collaboratively with key stakeholders including CER, EPA, HSE, DECLG, regional and local authorities. • IF2c: Apply clear and transparent investment prioritisation criteria.
Aim IF3 : Sustainable Funding Model - Establish a sustainable funding model to ensure that Irish Water can deliver the required capital investment in order to maintain critical assets and achieve the required outcomes for our customers, the environment and the national economy.	• IF3a: Transform the water industry in Ireland to an efficient water utility model within a regulated framework. • IF3b: Work with regulators to achieve optimum balance of affordability and service standards taking into account regulatory requirements. • IF3c: Deliver on Irish Water's commitments to raise public awareness of the value of water and achievements delivered.
Aim IF4: Research and Innovation - Promote research and proven, innovative technical solutions.	• IF4a: Actively pursue research and development in water services and track opportunities to develop and adopt new technologies. • IF4b: Engage effectively with universities, Institutes of Further Education, colleges and industry. • IF4c: Develop knowledge management capability and implementation processes.

Appendix B
Appropriate Assessment Outline Screening Report

January 2015
Doc Reg No. rbri07iir

APPROPRIATE ASSESSMENT
OUTLINE SCREENING REPORT

IN SUPPORT OF THE

APPROPRIATE ASSESSMENT

OF THE

Water Services Strategic Plan

IN ACCORDANCE WITH THE REQUIREMENTS OF
ARTICLE 6(3) OF THE EU HABITATS DIRECTIVE

for: Irish Water,

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Dublin 1

JUNE 2014

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Section 1 Introduction and Background

1.1 Background

AOS Planning has been appointed by Irish Water to provide an Outline Appropriate Assessment (AA) Screening Report in relation to the emerging Water Services Strategic Plan (WSSP) in accordance with the requirements of Article 6 of the EU Habitats Directive[1]. This report is divided into two sections as follow:

Section 1 Introduction and Background

Section 2 Stage 1 Screening

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 an EU-wide network of sites known as Natura 2000. These include candidate Special Areas of Conservation (cSACs) designated under the Habitats Directive and Special Protection Areas (SPAs) designated under the Conservation of Wild Birds Directive (Directive 2009/147/EC - codified version of Directive 79/409/EEC as amended), hereafter referred to as European sites.

Articles 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans and projects likely to affect European sites. Article 6(3) establishes the requirement for AA:

"Any plan or project not directly connected with or necessary to the management of the [Natura 2000] site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be 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

If, in spite of a negative assessment of the implications for the [Natura 2000] 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.

Where the site concerned hosts a priority natural habitat type and/or a priority species the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest."

These requirements are implemented in the Republic of Ireland (ROI) by the European Communities (Birds and Natural Habitats) Regulations 2011. These regulations consolidate the European Communities (Natural Habitats) Regulations 1997 to 2005 and the European Communities (Birds and

[1] Directive 92/43/EEC

Natural Habitats) (Control of Recreational Activities) Regulations 2010, as well as addressing transposition failures identified in the Court of Justice of the European Union (CJEU) judgments.

1.3 Stages of Appropriate Assessment

This Draft Outline AA Screening Report has been prepared in accordance with the following guidance:

- Appropriate Assessment of Plans and Projects in Ireland. Guidance for Planning Authorities. Department of the Environment, Heritage and Local Government, 2010.
- 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. European Commission Environment DG, 2002.
- Managing Natura 2000 sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC. European Commission, 2000

AA comprises up to four stages:

Stage One: Screening

The process which identifies the likely impacts upon a European site of a project or plan, either alone or in combination with other projects or plans, and considers whether these impacts are likely to be significant.

Stage Two: Appropriate Assessment

The consideration of the impact on the integrity of the European site of the project or plan, either alone or in combination with other projects or plans, with respect to the site's structure and function and its conservation objectives. Additionally, where there are adverse impacts, an assessment of the potential mitigation of those impacts.

Stage Three: Assessment of Alternative Solutions

The process which examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the European site.

Stage Four: Assessment where no alternative solutions exist and where adverse impacts remain

An assessment of compensatory measures where, in the light of an assessment of imperative reasons of overriding public interest (IROPI), it is deemed that the project or plan should proceed.

The Habitats Directive promotes a hierarchy of avoidance, mitigation and compensatory measures. First, the plan should aim to avoid any impacts on European sites by identifying possible impacts early in the plan-making process and writing the plan in order to avoid such impacts. Second, mitigation measures should be applied, if necessary, during the AA process to the point where no adverse impacts on the site(s) remain. If the plan is still likely to result in impacts on European sites, and no further practicable mitigation is possible, then it must be rejected. If no alternative solutions are identified and the plan is required for imperative reasons of overriding public interest (IROPI test) under Article 6(4) of the Habitats Directive, then compensation measures are required for any remaining adverse effect.

Section 2 Stage 1 Screening

2.1 Description of the Water Services Strategic Plan

2.1.1 Introduction

Irish Water is responsible for the operation of public water and wastewater services under the Water Services (No. 2) Act 2013. Irish Water is bringing the water and wastewater services of the 34 Local Authorities together under one national water utility that will be responsible for the management of national water assets, maintenance of the water system, managing capital projects as well as customer care and billing. In addition to this, Irish Water will also make capital and operational investment decisions regarding the country's national water infrastructure.

As part of this process, Irish Water is currently preparing a Water Services Strategic Plan (WSSP) which will set out Irish Water's high level strategies for providing water services to their customers over a 25 year horizon and how they will meet their environmental compliance commitments. The WSSP for Irish Water is intended to outline the strategic direction for Irish Water over the short, medium and long-term time frames up to 2040. Irish Water will identify what areas require focus and development in order to meet key objectives and mandate set out by government. The WSSP will be a strategic framework which will identify and prioritise the key objectives required to ensure the public water system can meet the challenges of the future. This framework will also allow future capital investment plans to be developed by Irish Water and approved by the Economic Regulator.

2.1.2 The WSSP Vision

The current version of the Vision of the WSSP is:

"We value water as a precious natural resource on which the quality of life depends."

"Through responsible stewardship, efficient management and strong partnerships, Ireland has a world-class water infrastructure that ensures secure and sustainable water services, essential for our health, our communities, the economy and the environment."

The over-riding objective of the WSSP is to realise this vision, by meeting the service expectations of their customers at the lowest achievable cost.

2.2 Content and Context of the WSSP

2.2.1 Content of the WSSP

As per the requirements of Article 33 (4) of the Water Services (No. 2) Act 2013, the WSSP will state the objectives of Irish Water in relation to the provision by Irish Water of water services and the means by which Irish Water proposes to achieve those objectives. The objectives will include those in relation to:

a) drinking water quality,

b) the prevention or abatement of risks to human health or the environment relating to the provision of water services,

c) the existing and projected demand for water services,

d) existing and planned arrangements for the provision of water services by Irish Water,

e) existing and reasonably foreseeable deficiencies in the provision of water services by Irish Water,

f) existing and planned water conservation measures,

g) the management of the property of Irish Water.

For additional information on the likely content of the WSSP please refer to Appendix I of the Draft SEA Scoping Document. It is foreseen that the outcome of the AA process will contribute to the final content of the WSSP.

2.2.2 Context for the WSSP

The WSSP is set in the overall context of water services planning, with related plans, projects and activities and their associated SEA, AA, Environmental Impact Assessment (EIA) and licensing as required under current legislation as illustrated in the schematic presented as Figure 2.1 below. The WSSP will not generally refer to specific water services projects.

The WSSP is at the highest tier (Tier I) of water services planning. The WSSP will set out Irish Water's high level strategies for providing water services to their customers over a 25 year horizon and how they will meet their environmental compliance commitments. The implementation and operation of the WSSP will be reviewed not later than 5 years after approval and thereafter as required by statute.

The implementation of the strategies identified in the WSSP will be detailed in a number of Implementation Plans (Tier II) which will be prepared by Irish Water following the approval of the WSSP by the Minister of the Environment Community and Local Government. These Implementation Plans: will include, for example, a National Water Resources Management Plan, a National Sludge Management Plan, Water Conservation Plans, Water Safety Plans etc. (note: this list is not exhaustive and titles of plans may change); will be reviewed on a cyclical basis; and will be subject to environmental assessment as appropriate. The requirement to carry out an SEA/AA on these individual plans will be considered at the commencement of preparing each plan and subject to the requirements of relevant legislation.

Irish Water has responsibility for providing a clean safe water supply to current and future customers connected to the network. The main activates associated with providing a water supply include the following:

- (Raw) Water abstraction (from surface or ground water);
- Treatment of raw water to a potable water standard (the level of treatment required will depend on the quality of raw water abstracted);
- Storage of raw and treated water;
- Distribute treated water to customers through a pipe network;
- Construction, operation, maintenance and management of the above; and
- Metering, billing and customer services.

Irish Water is also responsible for collecting, treating and safely disposing of wastewater from current and future customers connected to the public wastewater network. The main activities associated with providing effective management of wastewater include the following:

- Collection of wastewater from customers connected to the public wastewater sewer network;
- Collection and treatment of surface water where surface water drains are currently connected to the public sewer network;
- Treatment of wastewater to an acceptable standard set by legislation (the level of treatment required will depend on the type of receiving water and its assimilative capacity);
- Discharging treated wastewater to surface or groundwater under licence/certification by the EPA;
- Construction, operation, maintenance and management of the above; and
- Metering billing and customer services in relation to the above.

The high level strategies to be identified in the WSSP will focus on how Irish Water will plan for the above activities in order to provide water services to customers in a cost effective manner over a 25 year horizon and how Irish Water will meet environmental compliance commitments related to these

activities. It is not envisaged that geographical context will be attributed to the strategies identified in the WSSP. The subsequent Implementation Plans referred to above and in Figure 2.1 will detail how these strategies will be carried out at a regional and county level. The lists of activities to be carried out by IW are not exhaustive but identify the main activities that may have the potential to impact on the Natura 2000 network.

At Tier III of the hierarchy, the projects and activities required to implement the strategies outlined in the WSSP and detailed in the Implementation Plans will be identified and developed and will be subject to all appropriate EIA, AA, planning, licensing and permitting processes.

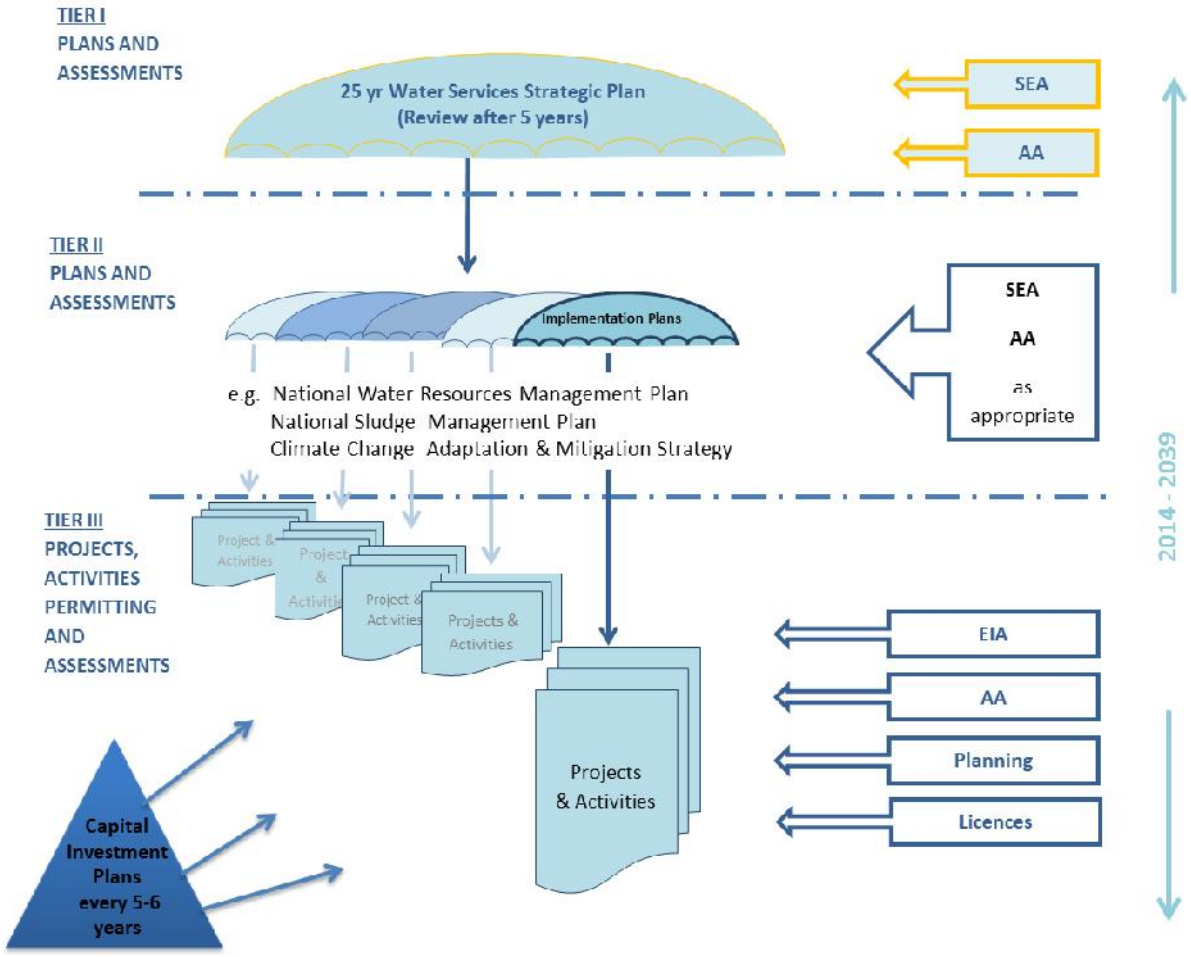

Figure 2.1: Planning and Environmental Assessment Hierarchy for Water Services

2.2.3 Relationship with other relevant Plans and Programmes

The WSSP is set in a water services planning context of related plans, projects and activities and their associated SEA, AA and Environmental Impact Assessment (EIA) requirements as illustrated in Figure 2.1.

Further examination of the WSSP by the AA will take account of Irish Water's obligation to comply with all environmental legislation and align with and cumulatively contribute towards – in combination with other users and bodies – the achievement of the objectives of the regulatory framework for environmental protection and management led by the Water Framework Directive and implemented by the River Basin Management Plans.

The following is a preliminary list of other plans, programmes and projects which relate to a range of sectors (e.g., water management, land use, energy) at a range of levels (e.g., national, regional, county, local) that are already subject to more specific higher and lower tier AA and that could potentially interact with the WSSP:

European	National / Regional	Sub-Regional
Water Framework Directive (2000/60/EC)	National Spatial Strategy for Ireland 2002-2020 People, Places and Potential	County and Town Development Plans
Surface Water Directive (75/440/EC)	Regional Planning Guidelines	Local Area Plans
Groundwater Directive (2006/118/EC)	Flood Risk Management Plans	Strategic Development Zones(SDZ)
Drinking Water Directive (98/83/EC)	River Basin Management Plans and associated Programmes of Measures - including International (Northern Ireland) Plans and Programmes	Housing Strategies
Bathing Water Directive (2006/7/EC)	Groundwater Protection Schemes	Biodiversity Action Plans
Marine Strategy Framework Directive (2008/56/EC)	Water Quality Management Plans	Heritage Plans
Urban Waste Water Treatment Directive (91/271/EEC)	Regional Waste Management Plans	County Landscape Character Assessments
Flood Directive (2007/60/EC)	National Renewable Energy Action Plan	
Freshwater Fish Directive (78/659/EEC)	Offshore Renewable Energy Development Plan	Special Amenity Area Order
Shellfish Waters Directive (2006/113/EC)	Harnessing Our Ocean Wealth	Shellfish Pollution Reduction Programmes
Habitats Directive (92/43/EEC)	Grid25 Implementation Programme	Freshwater Pearl Mussel Sub-Basin Management Plans
Birds Directive (2009/147/EC)	Harvest 2020	County Renewable Energy Strategies
Nitrates Directive (91/676/EEC)	Agri-vision 2015 Action Plan	Sludge Management Plans
	Rural Environmental Protection Scheme (REPS)	Greater Dublin Strategic Drainage Strategy
Dangerous Substances Directive (76/464/EEC) (2006/11/EC)	Agri-Environmental Options Scheme(AEOS)	Northern Ireland Water Resources Management Plan 2012
Environmental Quality Standards Directive (Directive 2008/105/EC)(also known as the Priority Substances Directive) as amended by Directive 2013/39/EU)	Green, Low-Carbon, Agri-environment Scheme (GLAS)	Strategic Integrated Framework Plan for the Shannon Estuary

European	National / Regional	Sub-Regional
Environmental Liability Directive (2004/35/EC)	National Rural Development Programme	Local/County Water Services Strategic Plans
SEA Directive (2001/42/EC)	Forests, Products and People. Ireland's Forest Policy - A Renewed Vision (Draft)	Local Catchment Flood Risk Management Plan
EIA Directive (85/337/EEC)	National Peatlands Strategy (Draft)	Office of Public Works Arterial Drainage Maintenance and High Risk Designation Programme 2011-2015
Renewable Energy Directive (2009/28/EC)	Raised Bog SAC Management Plan and Review of Raised Bog Natural Heritage Areas	
EU 2020 climate and energy package	National Climate Change Strategy	
A Blueprint to Safeguard Europe's Water Resources		
European Union Biodiversity Strategy to 2020		

2.3 Elements of the WSSP with Potential to Cause Adverse Impacts on the Natura 2000 Network

As outlined in Section 2.2 above, the WSSP is a high level strategy for the development of water services in Ireland at the highest tier (Tier I) of water services planning. It is a national strategy that does not refer to specific geographic locations or individual projects. However, the WSSP will provide an indication of the types of infrastructural requirements likely to arise in the future. The draft WSSP will provide as indicative overview of the general objectives for Irish Water over a 25 year period.

The types of activities that Irish Water will be responsible for during the implementation of the WSSP that could give rise to significant effects on the Natura 2000 network can be categorised into two main groups, relating to either; water supply, or wastewater treatment, as follows:

Water Supply

- (Raw) Water abstraction (from surface or ground water);
- Treatment of raw water to a potable water standard (the level of treatment required will depend on the quality of raw water abstracted);
- Storage of raw and treated water;
- Distribute treated water to customers through a pipe network; and
- Construction, operation, maintenance and management of the above.

Waste Water Treatment

- Collection of wastewater from customers connected to the public wastewater sewer network;
- Collection and treatment of surface water where surface water drains are currently connected to the public sewer network;
- Treatment of wastewater to an acceptable standard set by legislation (the level of treatment required will depend on the type of receiving water and its assimilative capacity);
- Discharging treated wastewater to surface or groundwater under licence/certification by the EPA; and
- Construction, operation, maintenance and management of the above.

2.4 Natura 2000 Network

2.4.1.1 SACs and SPAs

The European Union's Habitats Directive (Council Directive 92/43/EEC on the conservation of natural habitats and of wild flora and fauna), in conjunction with the Birds Directive (Council Directive 79/409/EEC on the conservation of wild birds) is the main legal tool of the European Union for nature conservation. The Birds Directive was adopted in 1979 by nine Member States, and was the first EU Directive on nature conservation. Since its adoption it has been a vital legal instrument for the conservation of all birds that occur naturally across the EU, acting in the broadest public interest to conserve Europe's natural heritage for present and future generations.

The Habitats Directive was proposed in 1988 and after many significant changes was adopted in July 1992. The stated aim of the Directive is to contribute to the maintenance of biodiversity within the European territory of the Member States through the conservation of natural habitats and of wild fauna and flora of Community interest. The Birds and Habitats Directive together offer useful legal conceptual models and a set of standards and norms in common use.

The Habitat Directive seeks to establish "Natura 2000", a network of protected areas throughout the European Community. It is the responsibility of each member state to designate Special Areas of Conservation (SACs) to protect habitats and species, which, together with the Special Protection Areas (SPAs) designated under the EU Birds Directive, form Natura 2000.

Member States are required to maintain or restore at 'favourable conservation status' the habitats and species of Community Importance listed in Annex I and II of the Habitats Directive.

According to the Habitats Directive (Article 1(I)) an SAC means a site of Community importance designated by the Member States through a statutory, administrative and/or contractual act where the necessary conservation measures are applied for the maintenance or restoration, at a favourable conservation status, of the natural habitats and/or the populations of the species for which the site is designated.

SPAs are classified under Article 4 of the Birds Directive. These areas are designated in order to protect endangered bird species listed in Annex I or migratory species.

It is general practice, when screening a plan or project for compliance with the Habitats Directive, to identify all European sites within the functional area of the plan itself and within 15 km of the boundaries of the area the plan applies to. This approach is currently recommended in the Department of the Environmental, Heritage and Local Government's document Guidance for Planning Authorities and as a precautionary measure, to ensure that all potentially affected European sites are included in the screening process. As the WSSP applies to the entire ROI and may have effects beyond Ireland's borders, the screening exercise considers all European sites within the ROI and Northern Ireland (NI).

There are 423 sites chosen as cSACs in the ROI designated for the protection of 59 Annex I habitats and 24 Annex II species (known as Qualifying Interests (QIs)). There are a further 57 cSACs in NI designated for the protection of 51 Annex I habitats and 15 Annex II species. See Table 2.1 and Table 2.2 for the full list of qualifying habitats and species for which sites are designated. The current list of all cSACs in the ROI and NI is presented in Appendix I.

There are 165 SPAs in the ROI designated for the conservation of 68 bird species. There are a further 16 SPAs in NI designated for the conservation of 20 bird species. The bird species that form the Special Conservation Interests of SPAs in the ROI and NI are listed in Table 2.3. Not all of these species are listed in Annex I of the Birds Directive, as several species are regularly occurring migratory species for which Ireland has a special responsibility. The current list of all cSACs in the ROI and NI is presented in Appendix I.

A map showing the overall distribution and extent of European Sites throughout the island of Ireland is presented in Figure 2.2.

Table 2.1: List of Habitats for which SACs are designated.

EU Habitat code	Habitat name (abbreviated version)[2]	Relevance to ROI / NI
91E0	Residual Alluvial Forests	ROI & NI
21A0	Machairs	ROI
91D0	Bog woodland	ROI & NI
91A0	Old Oak Woodlands	ROI & NI
91J0	Yew Woodlands	ROI
1110	Sandbanks	ROI & NI
1130	Estuaries	ROI & NI
1140	Tidal Mudflats and Sandflats	ROI & NI
1150	Coastal lagoons	ROI & NI
1160	Large shallow inlets and bays	ROI & NI
1170	Reefs	ROI & NI
1210	Annual vegetation of drift lines	ROI & NI
1220	Perennial vegetation of stony banks	ROI & NI
1230	Vegetated sea cliffs	ROI & NI
1310	Salicornia Mud	ROI & NI
1320	Spartina swards	ROI & NI
1330	Atlantic Salt Meadows	ROI & NI
1410	Mediterranean Salt Meadows	ROI
1420	Halophilous Scrubs	ROI
2110	Embryonic shifting dunes	ROI & NI
2120	Marram Dunes (white dunes)	ROI & NI
2130	Fixed Dunes (grey dunes)	ROI & NI
2140	Decalcified Empetrum Dunes	ROI
2150	Decalcified Dune Heath	ROI & NI
2160	Dunes with Hippopha rhamnoides	NI
2170	Dunes with Creeping Willow	ROI & NI
2190	Humid Dune Slacks	ROI & NI
3110	Lowland Oligotrophic Lakes	ROI
3130	Upland Oligotrophic Lakes	ROI & NI
3140	Hard Water Lakes	ROI & NI
3150	Natural eutrophic Waters	ROI & NI
3160	Dystrophic lakes	ROI & NI
3180	Turloughs	ROI & NI
3260	Floating River vegetation	ROI & NI
3270	Chenopodion rubri	ROI
4010	Wet heath	ROI & NI
4030	Dry heath	ROI & NI
4060	Alpine and Subalpine Heath	ROI & NI
5130	Juniper Scrub	ROI

[2] The sign '*' indicates priority habitat types.

EU Habitat code	Habitat name (abbreviated version)[2]	Relevance to ROI / NI
6130	Calaminarian grassland	ROI
6170	Alpine and subalpine calcareous grasslands	NI
6210	Orchid-Rich Grassland/Calcareous Grassland	ROI & NI
6230	Species-rich Nardus Upland Grassland	ROI & NI
6410	Molinia meadows	ROI & NI
6430	Hydrophilous tall herb	ROI
6510	Lowland Hay Meadows	ROI
7110	Raised Bog (Active*)	ROI & NI
7120	Degraded raised bogs	ROI & NI
7130	Blanket bog (Active*)	ROI & NI
7140	Transition mires	ROI & NI
7150	Rhynchosporian Depressions	ROI & NI
7210	Cladium Fens	ROI & NI
7220	Petrifying springs	ROI & NI
7230	Alkaline fens	ROI & NI
8110	Siliceous scree	ROI & NI
8120	Calcareous scree	ROI & NI
8210	Calcareous rocky slopes	ROI & NI
8220	Siliceous Rocky Slopes	ROI & NI
8240	Limestone pavement*	ROI & NI
8310	Caves	ROI
8330	Sea Caves	ROI & NI
9180	Tilio-Acerion forests of slopes, screes and ravines	NI
9580	Mediterranean Taxus baccata woods	ROI

Table 2.2: List of Annex II species for which SACs are designated in ROI and NI.

EU Species code	Species Name	Latin	Relevance to ROI / NI
1013	Geyer's Whirl Snail	Vertigo geyeri	ROI
1014	Narrow-mouthed Whirl Snail	Vertigo angustior	ROI & NI
1016	Desmoulin's Whirl Snail	Vertigo moulinsiana	ROI
1024	Kerry Slug	Geomalacus maculosus	ROI
1029	Fresh Water Pearl Mussel	Margaritifera margaritifera	ROI & NI
1065	Marsh Fritillary	Euphydryas aurinia	ROI & NI
1092	White-clawed Crayfish	Austropotamobius pallipes	ROI & NI
1095	Sea Lamprey	Petromyzon marinus	ROI & NI
1096	Brook Lamprey	Lampetra planeri	ROI & NI
1099	River Lamprey	Lampetra fluviatilis	ROI & NI
1102	Allis Shad	Alosa alosa	ROI
1103	Twaite Shad	Alosa fallax fallax	ROI
1106	Atlantic Salmon	Salmo salar	ROI & NI
1303	Lesser Horseshoe Bat	Rhinolophus hipposideros	ROI
1349	Bottlenose Dolphin	Tursiops truncatus	ROI & NI
1351	Harbour Porpoise	Phocoena phocoena	ROI & NI

EU Species code	Species Name	Latin	Relevance to ROI / NI
1355	Otter	Lutra lutra	ROI & NI
1364	Grey Seal	Halichoerus grypus	ROI & NI
1365	Common (Harbour) Seal	Phoca vitulina	ROI & NI
1393	Slender Green Feather-moss	Drepanocladus vernicosus	ROI
1395	Petalwort	Petalophyllum ralfsii	ROI & NI
1421	Killarney Fern	Trichomanes speciosum	ROI
1528	Marsh Saxifrage	Saxifraga hirculus	ROI & NI
1833	Slender Naiad	Najas flexilis	ROI
1990	Nore Fresh Water Pearl Mussel	Margaritifera durrovensis	ROI

Table 2.3: List of Special Conservation Interests (SCIs) for which SPAs are designated in the ROI and NI. Wetlands are also listed as an SCI of some SPAs in the ROI.

Species of Special Conservation Interest	Latin	Annex I species	Relevance to ROI / NI
Arctic Tern	Sterna paradisaea	✓	ROI & NI
Barnacle Goose	Branta leucopsis	✓	ROI & NI
Bar-tailed Godwit	Limosa lapponica	✓	ROI
Bewick's Swan	Cygnus columbianus	✓	ROI
Black-headed Gull	Larus ridibundus		ROI
Black-tailed Godwit	Limosa limosa		ROI
Chough	Pyrrhocorax pyrrhocorax	✓	ROI
Common Gull	Larus canus		ROI
Common Scoter	Melanitta nigra		ROI
Common Tern	Sterna hirundo	✓	ROI & NI
Coot	Fulica atra		ROI
Cormorant	Phalacrocorax carbo		ROI & NI
Corncrake	Crex crex	✓	ROI
Curlew	Numenius arquata		ROI
Dunlin	Calidris alpina schinzii	✓	ROI
Fulmar	Fulmarus glacialis		ROI
Gadwall	Anas strepera		ROI
Gannet	Morus bassanus		ROI
Golden Plover	Pluvialis apricaria	✓	ROI & NI
Goldeneye	Bucephala clangula		ROI
Great Crested Grebe	Podiceps cristatus		ROI & NI
Great Northern Diver	Gavia immer	✓	ROI
Greenland White-fronted Goose	Anser albifrons flavirostris	✓	ROI
Greenshank	Tringa nebularia		ROI
Grey Heron	Ardea cinerea		ROI
Grey Plover	Pluvialis squatarola		ROI
Greylag Goose	Anser anser		ROI
Guillemot	Uria aalge		ROI & NI

Species of Special Conservation Interest	Latin	Annex I species	Relevance to ROI / NI
Hen Harrier	Circus cyaneus	✓	ROI & NI
Herring Gull	Larus argentatus		ROI
Kittiwake	Rissa tridactyla		ROI & NI
Knot	Calidris canutus		ROI & NI
Lapwing	Vanellus Vanellus		ROI
Leach's Petrel	Oceanodroma leucorhoa	✓	ROI
Lesser Black-backed Gull	Larus fuscus		ROI
Light-bellied Brent Goose	Branta bernicla hrota		ROI
Little Grebe	Tachybaptus ruficollis		ROI
Little Tern	Sterna albifrons	✓	ROI
Mallard	Anas platyrhynchos		ROI
Manx Shearwater	Puffinus puffinus		ROI & NI
Merlin	Falco columbarius	✓	ROI & NI
Oystercatcher	Haematopus ostralegus		ROI
Peregrine	Falco peregrines	✓	ROI & NI
Pintail	Anas acuta		ROI
Pochard	Aythya farina		ROI
Puffin	Fratercula arctica		ROI
Purple Sandpiper	Calidris maritima		ROI
Razorbill	Alca torda		ROI & NI
Red-breasted Merganser	Mergus serrator		ROI
Redshank	Tringa tetanus		ROI & NI
Red-throated Diver	Gavia stellata	✓	ROI
Ringed Plover	Charadrius hiaticula		ROI & NI
Roseate Tern	Sterna dougallii	✓	ROI & NI
Sanderling	Calidris alba		ROI
Sandwich Tern	Sterna sandvicensis	✓	ROI & NI
Scaup	Aythya marila		ROI
Shag	Phalacrocorax aristotelis		ROI
Shelduck	Tadorna tadorna		ROI
Shoveler	Anas clypeata		ROI
Storm Petrel	Hydrobates pelagicus	✓	ROI
Teal	Anas crecca		ROI
Tufted Duck	Aythya fuligula		ROI
Turnstone	Arenaria interpres		ROI & NI
Whooper Swan	Cygnus cygnus	✓	ROI & NI
Wigeon	Anas penelope		ROI

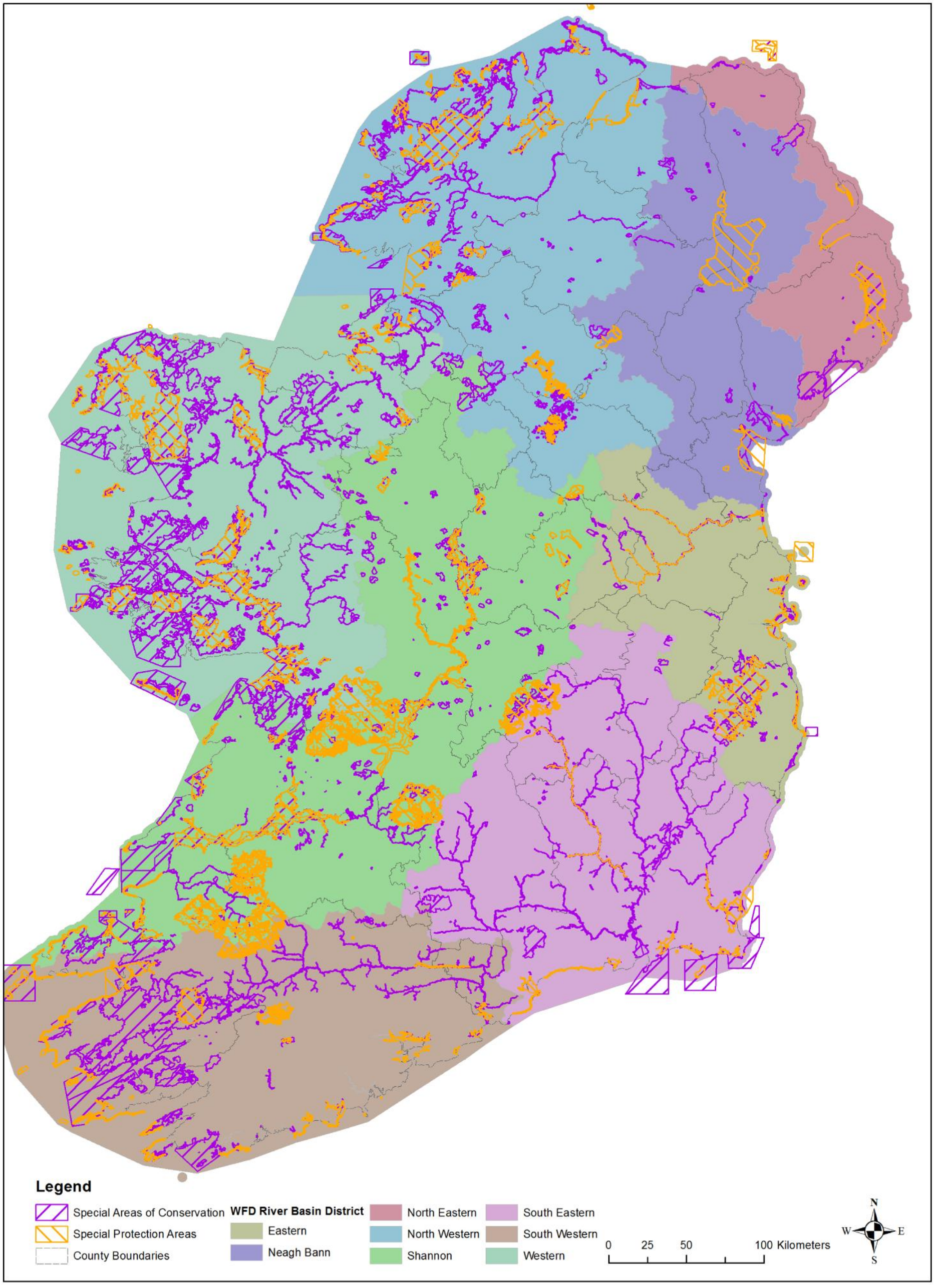

Figure 2.2: Map showing the distribution and extent of designated European sites on the island of Ireland overlain on the Water Framework Directive River Basin Districts.

2.5 Assessment Criteria

2.5.1 Direct, Indirect or Secondary Impacts

This section of the screening exercise includes a preliminary examination of the types of impacts that may arise during the implementation of the WSSP.

The type of impacts that may potentially arise depends on the characteristics of particular projects or activities undertaken by IW in achieving the objectives of the Plan. Typical projects or activities that could give rise to impacts include the construction, operation, maintenance, and management of the following:

- Water abstraction (surface water and groundwater);
- Water storage;
- Pipe network for delivery of treated water;
- Pipe network for the collection of waste water and surface water;
- Collection of waste water and surface water in the public sewer network;
- Treatment of waste water and surface water; and
- Discharging treated wastewater to surface or groundwater.

The European Commission's document "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", lists impacts that may potentially occur upon the Natura 2000 network, listed as follows:

- Loss / Reduction of habitat area;
- Disturbance to key species;
- Habitat / Species fragmentation;
- Reduction in species density; and
- Changes in key indicators of conservation value (such as decrease in water quality and / or quantity).

A key consideration in determining potential for adverse impacts on European sites is the sensitivity of features for which the sites are designated. The Qualifying Interests of cSACs and Special Conservation Interests of SPAs can be categorised into a number of groups based on their sensitivity to impacts from different pathways as follows:

- Surface Water Dependant Habitats and Species;
- Ground Water Dependant Habitats and Species;
- Coastal Transitional and Marine Habitats and Species; and
- Other Terrestrial Habitats and Species.

A summary of potential impacts on European sites taking into consideration possible sources of impacts and the sensitivity of sites is presented in Table 2.4.

2.5.1.1 Loss / Reduction of Habitat Area

Direct habitat loss is caused where there is complete removal of a habitat type. Habitat loss can also occur through the reduction of habitat quality and a loss of important habitat functions. It can arise from the introduction of invasive species, toxic contamination, or physical alteration.

Loss or reduction of habitat area may occur through the installation of necessary water pipes and water services facilities. Direct loss or reduction of habitat area will be confined to works which take place within or in close proximity to a European site(s).

2.5.1.2 Disturbance to Key Species

Key species are defined as those listed on the Annexes of the EU Habitats Directive and Bird's Directive for which sites are designated. Disturbance to species supported by a European site is likely to increase where there is an increase in activity levels from developments within or adjacent to designated areas. Sources of disturbance include noise, vibration, light, emanating from construction and / or operational activities.

In relation to the activities of Irish Water, disturbance to key species could result from construction associated with any new water services infrastructure that may be required to meet the objectives of the WSSP. Similarly, operational activities of Irish Water could also give rise to disturbance where they are undertaken in proximity to a European site(s).

2.5.1.3 Habitat / Species Fragmentation

Habitat and species fragmentation can occur through the breaking up of or loss of habitats resulting in interference with existing ecological units. Fragmentation can also result from impediments to the natural movements of species. This is relevant where important corridors for movement or migration are likely to be disrupted such as along river corridors when construction may introduce a barrier to the free movement of species from one area of habitat to another. Habitat / species fragmentation may arise from the construction of new water services infrastructure and is particularly relevant to linear developments such as the laying major pipelines through semi-natural areas. Habitat / species fragmentation could also arise from ongoing operation of water services due to for example, deterioration in water quality as a result of discharges to sensitive receptors.

2.5.1.4 Reduction in Species Density

Reduction in species density may result from loss / reduction of habitat area, disturbance, or fragmentation, either individually or in combination. In addition, changes in habitat quality could lead to reductions in populations of sensitive species. In relation to the WSSP, surface and groundwater dependant species would be sensitive to any deterioration in habitat quality due to changes in water quality or quantity that could result from water abstraction or discharges to receiving waters (see below).

2.5.1.5 Changes in Key Indicators of Conservation Value

The key indicators of conservation value for the majority of sites likely to be affected by the implementation of the WSSP are surface water and groundwater quality and quantity.

Any deterioration in water quality within surface and ground water dependant ecosystems can lead to direct and indirect impacts on a range of habitats and species of conservation importance.

Similarly, changes in water quantity (water table height; flow regime; flow rates etc) can also impact on many habitats and species that are associated with freshwater and marine European sites.

In relation to the WSSP, the main sources of such impacts could include:

- the abstraction of surface water or groundwater from areas that are hydrologically linked to sensitive European sites;
- the discharge of treated waste water to sensitive surface or groundwater receptors that are hydrologically linked to sensitive European sites; and
- potential discharge of silt laden waters or other pollutants from construction related projects.

Table 2.4: Potential impacts arising from activities and projects likely to be undertaken in order to achieve the aims of the WSSP.

WSSP Related Activities / Projects	Potential Impacts	Vulnerable Features of European Sites	European Sites Potentially Affected
Water abstraction	• Reduction of habitat area; • Reduction in species density; • Changes in key indicators of conservation value (water quantity).	Surface water dependant habitats and species; Groundwater dependant habitats and species.	All sites which contain surface and/or groundwater dependant habitats and species that are hydrologically linked to abstractions.
Discharge of treated waste water	• Reduction of habitat area; • Reduction in species density; • Fragmentation; • Changes in key indicators of conservation value (water quantity and quality).	Surface water dependant habitats and species; Groundwater dependant habitats and species; Coastal transitional and marine habitats and species.	All sites hydrologically connected with receiving waters which are designated for any of the following: • Surface water dependant habitats and species • Groundwater dependant habitats and species • Coastal transitional and marine habitats and species.
Development of new water services infrastructure	• Loss / reduction of habitat area; • Disturbance to species; • Fragmentation; • Changes in key indicators of conservation value.	Surface water dependant habitats and species; Groundwater dependant habitats and species; Terrestrial habitats and species; Coastal transitional and marine habitats and species.	All mainland and coastal sites within ROI; Sites in NI that contain water dependant habitats and species which are hydrologically linked to the ROI.

2.6 Is the Plan Necessary to the Management of European Sites?

Under the Habitats Directive, Plans that are directly connected with or necessary to the management of a European site do not require AA. For this exception to apply, management is required to be interpreted narrowly as nature conservation management in the sense of Article 6(1) of the Habitats Directive. This refers to specific measures to address the ecological requirements of annexed habitats and species (and their habitats) present on a site(s). The relationship should be shown to be direct and not a by-product of the plan, even if this might result in positive or beneficial effects for a site(s).

The primary purpose of the WSSP is not the nature conservation management of the sites, but to provide for development and maintenance of water supply and waste water treatment. Therefore, the WSSP is not considered by the Habitats Directive to be directly connected with or necessary to the management of European designated sites.

2.7 European Sites Potentially Affected by the Plan

The draft WSSP is a high level plan which outlines objectives of Irish Water that will influence future developments of water services and waste water treatment in Ireland. As such, the plan covers large unspecific areas and does not identify particular areas for development. This broad scope limits the Appropriate Assessment as to what can be adequately assessed at this stage.

A high level assessment of potential impacts on European sites due to the implementation of the WSSP is presented in Table 2.4. This assessment concludes that the following European sites should be screened in and therefore require further consideration in the AA process as it is not possible at this stage to rule out potential significant effects:

- All European sites that occur in the ROI (see Appendix I);
- All European sites in NI that are hydrologically linked to the ROI and are designated for water dependant habitats and / or species (the only sites in NI that are hydrologically isolated from the ROI (and therefore can be screened out) are those that occur within the North Eastern River Basin District, see Figure 2.2).

2.8 Other Plans and Programmes

Article 6(3) of the Habitats Directive requires an assessment of a plan or project to consider other plans or programmes that might, in combinations with the plan or project, have the potential to adversely impact upon European sites. Table 2.5 lists the plans or projects that may interact with the draft Plan to cause in-combination effects to European sites. The plans or projects are listed according to a spatial hierarchy of International, National, Regional/Local Projects and Plans.

Given the uncertainties that exist with regard to the scale and location of developments facilitated by the draft Plan, it is recognised that the identification of cumulative impacts is limited and that the assessment of in-combination effects will need to be undertaken in a more comprehensive manner at the lower level plan or project-level.

Further examination of the WSSP by the AA will take account of Irish Water's obligation to comply with all environmental legislation and align with and cumulatively contribute towards – in combination with other users and bodies – the achievement of the objectives of the regulatory framework for environmental protection and management led by the Water Framework Directive and implemented by the River Basin Management Plans.

Table 2.5: Plans and Projects Likely to Cause In-Combination Effects

Directive	Purpose	Interactions resulting in Cumulative Impacts
International		
EU Water Framework Directive (2000/60/EC)	Objectives seek to maintain and enhance the quality of all surface waters in the EU.	No risk of likely significant in-combination effects will result as the primary purpose of the Directive is to improve environmental quality. Implementation of the WSSP should assist Ireland in achieving its WFD objectives.
Bathing Water Directive (2006/7/EC)	Preserve, protect and improve the quality of the environment and to protect human health by complementing the Water Framework Directive 2000/60/EC	No risk of likely significant in-combination effects will result as the primary purpose of the Directive is to improve water quality. Implementation of the WSSP should assist in achieving the objectives of the Directive.
Marine Strategy Framework Directive (2008/56/EC)	Establishes a framework whereby the necessary measures are undertaken to achieve or maintain good environmental status in the marine environment by the year 2020.	No risk of likely significant in-combination effects will result as the primary purpose of the Directive is to improve environmental quality. Implementation of the WSSP should assist in achieving the objectives of the Directive.
Shellfish Waters Directive (2006/113/EC)	Protect and improve the quality of shellfish waters in order to support selected shellfish populations. The Shellfish Waters Directive (92006/113/EC) was repealed by the Water Framework Directive from December 2013.	No risk of likely significant in-combination effects will result as the primary purpose of the Directive is to improve water quality. Implementation of the WSSP should assist in achieving the objectives of the Directive.
EU Freshwater Fish Directive (78/659/EEC)	Objectives seek to protect those fresh water bodies identified by Member States as waters suitable for sustaining	No risk of likely significant in-combination effects will result as the primary purpose of the

Directive	Purpose	Interactions resulting in Cumulative Impacts
	fish populations. For those waters it sets physical and chemical water quality objectives for salmonid waters and cyprinid waters.	Directive is to improve environmental quality. Implementation of the WSSP should assist Ireland in achieving its obligations under the Directive.
EU Groundwater Directive (2006/118/EC)	This directive establishes a regime, which sets underground water quality standards and introduces measures to prevent or limit inputs of pollutants into groundwater.	No risk of likely significant in-combination effects will result as the primary purpose of the Directive is to improve environmental quality. Implementation of the WSSP should assist Ireland in achieving its obligations under the Directive.
EU Floods Directive (2007/60/EC)	The Floods Directive applies to river basins and coastal areas at risk of flooding. With trends such as climate change and increased domestic and economic development in flood risk zones, this poses a threat of flooding in coastal and river basin areas.	Potential in-combination impacts may arise where changes in hydrographic flow could result from the development of water services infrastructure.
Nitrates Directive (91/676/EEC)	This Directive has the objective of reducing water pollution caused or induced by nitrates from agricultural sources and preventing further pollution.	No risk of likely significant in-combination effects will result as the primary purpose of the Directive is to improve environmental quality.
The Urban Wastewater Treatment Directive (91/271/EEC)	The primary objective is to protect the environment from the adverse effects of discharges of urban wastewater, by the provision of urban wastewater collecting systems (sewerage) and treatment plants for urban centres. The Directive also provides general rules for the sustainable disposal of sludge arising from wastewater treatment.	No risk of likely significant in-combination effects will result as the primary purpose of the Directive is to improve environmental quality. Implementation of the WSSP should assist Ireland in achieving its obligations under the Directive.
Sewage Sludge Directive (86/278/EEC)	Objective is to encourage the appropriate use of sewage sludge in agriculture and to regulate its use in such a way as to prevent harmful effects on soil, vegetation, animals and man. To this end, it prohibits the use of untreated sludge on agricultural land unless it is injected or incorporated into the soil.	No risk of likely significant in-combination effects will result as the primary purpose of the Directive is to improve environmental quality. Implementation of the WSSP should assist Ireland in achieving its obligations under the Directive.
The Integrated Pollution Prevention Control Directive (96/61/EC)	Objective is to achieve a high level of protection of the environment through measures to prevent or, where that is not practicable, to reduce emissions to air, water and land from industrial sources.	No risk of likely significant in-combination effects will result as the primary purpose of the Directive is to improve environmental quality. Implementation of the WSSP should assist in achieving the objectives of the Directive.
European Union Biodiversity Strategy to 2020	Aims to halt or reverse biodiversity loss and speed up the EU's transition towards a resource efficient and green	No risk of likely significant in-combination effects will result as the primary purpose of the

Directive	Purpose	Interactions resulting in Cumulative Impacts
	economy. Halting the loss of biodiversity and the degradation of ecosystem services in the EU by 2020, and restoring them in so far as feasible.	Strategy is to improve water quality. Opportunities may exist in the implementation of the WSSP to assist in achieving the objectives of the Strategy.
National / Regional		
National Spatial Strategy 2002-2020	Objectives of the NSS are to achieve a better balance of social, economic and physical development across Ireland, supported by more effective planning.	Potential in-combination impacts may arise where there is a requirement to provide new water services infrastructure.
Grid 25	Grid25 is a high-level strategy outlining how EirGrid intends to undertake the development of the electricity transmission grid in the short, medium and longer terms, to support a long-term sustainable and reliable electricity supply. The Grid25 strategy thereby seeks to implement the provisions of the 2007 Government White Paper on Energy - "Delivering a Sustainable Energy Future for Ireland" in terms of development of electricity transmission infrastructure. The Grid25 Implementation Programme (IP) is a practical strategic overview of how the early stages of Grid25 are intended to be implemented.	Potential in-combination impacts may arise where new infrastructure is planned.
Harvest 2020	Aims to innovate and expand the Irish food industry in response to increased global demand for quality foods. Sets out a vision for the potential growth in agricultural output after the removal of milk quotas in 2015	Potential in-combination impacts may arise due to increased pressures on the water environment associated with an intensification of agriculture.
Rural Environmental Protection Scheme (REPS) Agri-Environmental Options Scheme(AEOS) Green, Low-Carbon, Agri-environment Scheme (GLAS)	Agri-environmental funding schemes aimed at rural development for the environmental enhancement and protection	No risk of likely significant in-combination effects will result as the primary purpose of the schemes is to improve environmental quality.
Forests, Products and People. Ireland's Forest Policy - A Renewed Vision (Draft)	Outlines the framework for developing an internationally competitive and sustainable forestry sector that provides a range of economic, environmental and social benefits.	Potential in-combination impacts may arise due to any increased pressures on the water environment associated with forestry activities in sensitive areas.
National Peatlands Strategy (Draft)	Establishes principles in relation to Irish peatlands in order to guide Government policy. Aims to provide a framework for which all of the peatlands within the State can be managed responsibly in	No risk of likely significant in-combination effects foreseen.

Directive	Purpose	Interactions resulting in Cumulative Impacts
	order to optimise their social, environmental and economic contribution.	
Raised Bog SAC Management Plan and Review of Raised Bog Natural Heritage Areas	Aims to meet nature conservation obligations while having regard to national and local economic, social and cultural needs.	No risk of likely significant in-combination effects foreseen.
Regional Planning Guidelines	Policy document which aims to direct the future growth of the Midlands Area over the medium to long term and works to implement the strategic planning framework set out in the National Spatial Strategy (NSS)	Potential in-combination impacts may arise where there is a requirement to provide for new water services infrastructure.
Office of Public Works Arterial Drainage Maintenance and High Risk Designation Programme 2011-2015	Part 1 of the Programme comprises Arterial Drainage Maintenance (including Scheme Channel Maintenance Works, Maintenance of Scheme Structures, Scheme Embankment Maintenance and Flood Relief Scheme Maintenance. Part 2 of the Programme comprises High Risk Channel Designation.	Potential in-combination impacts may arise where there are pressures on Natura sites from Arterial Drainage maintenance schemes.
Local		
County Renewable Energy Strategies	Aims to ensure competitive, secure and sustainable energy.	Potential in-combination impacts may arise where new infrastructure is planned.
County / City / Town Development Plans	Overall strategies for the proper planning and sustainable development of the administrative area of the relevant Local Authorities.	The core aims of Development Plans are to increase the community's employment, infrastructure, energy, residential, economic and water services potential. Potential in-combination impacts may arise where there is a requirement to provide for new water services infrastructure.

2.9 Conclusions

The likely significant effects that may arise from the implementation of the WSSP have been examined in the context of a number of factors that could potentially affect the integrity of the Natura 2000 network. On the basis of the findings of this Screening for Appropriate Assessment, it is concluded that the Plan:

(i) is not directly connected with or necessary to the management of a European site and

(ii) may have significant impacts on the Natura 2000 network.

Therefore, applying the Precautionary Principle and in accordance with Article 6(3) of the Habitats Directive, a Stage 2 Appropriate Assessment is required.

As the WSSP progresses further the AA screening outlined in this report should be updated and revised as new informtion becomes available. It is recommended that the screening should be refined further to determine the relevant European sites that can be screened out based on the absence of particular habitats or species.

APPROPRIATE ASSESSMENT
OUTLINE SCREENING REPORT

APPENDIX I

LIST OF EUROPEAN SITES (cSACs AND SPAs) CONSIDERED

IN SUPPORT OF THE

APPROPRIATE ASSESSMENT

OF THE

Water Services Strategic Plan

IN ACCORDANCE WITH THE REQUIREMENTS OF
ARTICLE 6(3) OF THE EU HABITATS DIRECTIVE

for: Irish Water,

Colvill House,

24 – 26 Talbot Street

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List of Tables

Introduction

This Appendix presents a list of all candidate Special Areas of Conservation (cSACs) and Special Protection Areas (SPAs) under consideration in the Appropriate Assessment Screening report prepared in support of the Water Services Strategic Plan (WSSP) being developed by Irish Water.

Those sites that are designated as cSACs are presented in Table 1 while those sites designated as SPAs are presented in Table 2.

Table 1: Candidate Special Areas of Conservation that were considered in the Appropriate Assessment of the WSSP.

Site Code	Site Name	ROI / NI
IE0000006	Killyconny Bog (Cloghbally)	ROI
IE0000007	Lough Oughter and Associated Loughs	ROI
IE0000014	Ballyallia Lake	ROI
IE0000016	Ballycullinan Lake	ROI
IE0000019	Ballyogan Lough	ROI
IE0000020	Black Head-Poulsallagh Complex	ROI
IE0000030	Danes Hole, Poulnalecka	ROI
IE0000032	Dromore Woods and Loughs	ROI
IE0000036	Inagh River Estuary	ROI
IE0000037	Pouladatig Cave	ROI
IE0000051	Lough Gash Turlough	ROI
IE0000054	Moneen Mountain	ROI
IE0000057	Moyree River System	ROI
IE0000064	Poulnagordon Cave (Quin)	ROI
IE0000077	Ballymacoda (Clonpriest and Pillmore)	ROI
IE0000090	Glengarriff Harbour and Woodland	ROI
IE0000091	Clonakilty Bay	ROI
IE0000093	Caha Mountains	ROI
IE0000097	Lough Hyne Nature Reserve and Environs	ROI
IE0000101	Roaringwater Bay and Islands	ROI
IE0000102	Sheep's Head	ROI
IE0000106	St. Gobnet's Wood	ROI
IE0000108	The Gearagh	ROI
IE0000109	Three Castle Head to Mizen Head	ROI
IE0000111	Aran Island (Donegal) Cliffs	ROI
IE0000115	Ballintra	ROI
IE0000116	Ballyarr Wood	ROI
IE0000129	Croaghonagh Bog	ROI
IE0000133	Donegal Bay (Murvagh)	ROI
IE0000138	Durnesh Lough	ROI

Site Code	Site Name	ROI / NI
IE0000140	Fawnboy Bog/Lough Nacung	ROI
IE0000142	Gannivegil Bog	ROI
IE0000147	Horn Head and Rinclevan	ROI
IE0000154	Inishtrahull	ROI
IE0000163	Lough Eske and Ardnamona Wood	ROI
IE0000164	Lough Nagreany Dunes	ROI
IE0000165	Lough Nillan Bog (Carrickatlieve)	ROI
IE0000168	Magheradrumman Bog	ROI
IE0000172	Meenaguse/Ardbane Bog	ROI
IE0000173	Meentygrannagh Bog	ROI
IE0000174	Curraghchase Woods	ROI
IE0000181	Rathlin O'Birne Island	ROI
IE0000185	Sessiagh Lough	ROI
IE0000189	Slieve League	ROI
IE0000190	Slieve Tooey/Tormore Island/Loughros Beg Bay	ROI
IE0000191	St. John's Point	ROI
IE0000194	Tranarossan and Melmore Lough	ROI
IE0000197	West of Ardara/Maas Road	ROI
IE0000199	Baldoyle Bay	ROI
IE0000202	Howth Head	ROI
IE0000204	Lambay Island	ROI
IE0000205	Malahide Estuary	ROI
IE0000206	North Dublin Bay	ROI
IE0000208	Rogerstown Estuary	ROI
IE0000210	South Dublin Bay	ROI
IE0000212	Inishmaan Island	ROI
IE0000213	Inishmore Island	ROI
IE0000216	River Shannon Callows	ROI
IE0000218	Coolcam Turlough	ROI
IE0000231	Barroughter Bog	ROI
IE0000238	Caherglassaun Turlough	ROI
IE0000242	Castletaylor Complex	ROI
IE0000248	Cloonmoylan Bog	ROI
IE0000252	Coole-Garryland Complex	ROI
IE0000255	Croaghill Turlough	ROI
IE0000261	Derrycrag Wood Nature Reserve	ROI
IE0000268	Galway Bay Complex	ROI
IE0000278	Inishbofin and Inishshark	ROI
IE0000285	Kilsallagh Bog	ROI
IE0000286	Kiltartan Cave (Coole)	ROI
IE0000295	Levally Lough	ROI
IE0000296	Lisnageeragh Bog and Ballinastack Turlough	ROI

Site Code	Site Name	ROI / NI
IE0000297	Lough Corrib	ROI
IE0000299	Lough Cutra	ROI
IE0000301	Lough Lurgeen Bog/Glenamaddy Turlough	ROI
IE0000304	Lough Rea	ROI
IE0000308	Loughatorick South Bog	ROI
IE0000318	Peterswell Turlough	ROI
IE0000319	Pollnaknockaun Wood Nature Reserve	ROI
IE0000322	Rahasane Turlough	ROI
IE0000324	Rosroe Bog	ROI
IE0000326	Shankill West Bog	ROI
IE0000328	Slyne Head Islands	ROI
IE0000330	Tully Mountain	ROI
IE0000332	Akeragh, Banna and Barrow Harbour	ROI
IE0000335	Ballinskelligs Bay and Inny Estuary	ROI
IE0000343	Castlemaine Harbour	ROI
IE0000353	Old Domestic Building, Dromore Wood	ROI
IE0000364	Kilgarvan Ice House	ROI
IE0000365	Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment	ROI
IE0000370	Lough Yganavan and Lough Nambrackdarrig	ROI
IE0000375	Mount Brandon	ROI
IE0000382	Sheheree (Ardagh) Bog	ROI
IE0000391	Ballynafagh Bog	ROI
IE0000396	Pollardstown Fen	ROI
IE0000397	Red Bog, Kildare	ROI
IE0000404	Hugginstown Fen	ROI
IE0000407	The Loughans	ROI
IE0000412	Slieve Bloom Mountains	ROI
IE0000428	Lough Melvin	ROI
IE0000432	Barrigone	ROI
IE0000439	Tory Hill	ROI
IE0000440	Lough Ree	ROI
IE0000448	Fortwilliam Turlough	ROI
IE0000453	Carlingford Mountain	ROI
IE0000455	Dundalk Bay	ROI
IE0000458	Killala Bay/Moy Estuary	ROI
IE0000461	Ardkill Turlough	ROI
IE0000463	Balla Turlough	ROI
IE0000466	Bellacorick Iron Flush	ROI
IE0000470	Mullet/Blacksod Bay Complex	ROI
IE0000471	Brackloon Woods	ROI
IE0000472	Broadhaven Bay	ROI

Site Code	Site Name	ROI / NI
IE0000474	Ballymaglancy Cave, Cong	ROI
IE0000475	Carrowkeel Turlough	ROI
IE0000476	Carrowmore Lake Complex	ROI
IE0000479	Cloughmoyne	ROI
IE0000480	Clyard Kettle-holes	ROI
IE0000484	Cross Lough (Killadoon)	ROI
IE0000485	Corraun Plateau	ROI
IE0000492	Doocastle Turlough	ROI
IE0000495	Duvillaun Islands	ROI
IE0000497	Flughany Bog	ROI
IE0000500	Glenamoy Bog Complex	ROI
IE0000503	Greaghans Turlough	ROI
IE0000504	Kilglassan/Caheravoostia Turlough Complex	ROI
IE0000507	Inishkea Islands	ROI
IE0000516	Lackan Saltmarsh and Kilcummin Head	ROI
IE0000522	Lough Gall Bog	ROI
IE0000525	Shrule Turlough	ROI
IE0000527	Moore Hall (Lough Carra)	ROI
IE0000532	Oldhead Wood	ROI
IE0000534	Owenduff/Nephin Complex	ROI
IE0000541	Skealoghan Turlough	ROI
IE0000542	Slieve Fyagh Bog	ROI
IE0000566	All Saints Bog and Esker	ROI
IE0000571	Charleville Wood	ROI
IE0000572	Clara Bog	ROI
IE0000575	Ferbane Bog	ROI
IE0000576	Fin Lough (Offaly)	ROI
IE0000580	Mongan Bog	ROI
IE0000581	Moyclare Bog	ROI
IE0000582	Raheenmore Bog	ROI
IE0000584	Cuilcagh - Anierin Uplands	ROI
IE0000585	Sharavogue Bog	ROI
IE0000588	Ballinturly Turlough	ROI
IE0000592	Bellanagare Bog	ROI
IE0000595	Callow Bog	ROI
IE0000597	Carrowbehy/Caher Bog	ROI
IE0000600	Cloonchambers Bog	ROI
IE0000604	Derrinea Bog	ROI
IE0000606	Lough Fingall Complex	ROI
IE0000607	Errit Lough	ROI
IE0000609	Lisduff Turlough	ROI
IE0000610	Lough Croan Turlough	ROI

Site Code	Site Name	ROI / NI
IE0000611	Lough Funshinagh	ROI
IE0000612	Mullygollan Turlough	ROI
IE0000614	Cloonshanville Bog	ROI
IE0000622	Ballysadare Bay	ROI
IE0000623	Ben Bulben, Gleniff and Glenade Complex	ROI
IE0000625	Bunduff Lough and Machair/Trawalua/Mullaghmore	ROI
IE0000627	Cummeen Strand/Drumcliff Bay (Sligo Bay)	ROI
IE0000633	Lough Hoe Bog	ROI
IE0000634	Lough Nabrickkeagh Bog	ROI
IE0000636	Templehouse and Cloonacleigha Loughs	ROI
IE0000637	Turloughmore (Sligo)	ROI
IE0000638	Union Wood	ROI
IE0000641	Ballyduff/Clonfinane Bog	ROI
IE0000646	Galtee Mountains	ROI
IE0000647	Kilcarren-Firville Bog	ROI
IE0000665	Helvick Head	ROI
IE0000668	Nier Valley Woodlands	ROI
IE0000671	Tramore Dunes and Backstrand	ROI
IE0000679	Garriskil Bog	ROI
IE0000685	Lough Ennell	ROI
IE0000688	Lough Owel	ROI
IE0000692	Scragh Bog	ROI
IE0000696	Ballyteige Burrow	ROI
IE0000697	Bannow Bay	ROI
IE0000700	Cahore Polders and Dunes	ROI
IE0000704	Lady's Island Lake	ROI
IE0000707	Saltee Islands	ROI
IE0000708	Screen Hills	ROI
IE0000709	Tacumshin Lake	ROI
IE0000710	Raven Point Nature Reserve	ROI
IE0000713	Ballyman Glen	ROI
IE0000714	Bray Head	ROI
IE0000716	Carriggower Bog	ROI
IE0000717	Deputy's Pass Nature Reserve	ROI
IE0000719	Glen of the Downs	ROI
IE0000725	Knocksink Wood	ROI
IE0000729	Buckroney-Brittas Dunes and Fen	ROI
IE0000733	Vale of Clara (Rathdrum Wood)	ROI
IE0000764	Hook Head	ROI
IE0000770	Blackstairs Mountains	ROI
IE0000781	Slaney River Valley	ROI
IE0000831	Cullahill Mountain	ROI

Site Code	Site Name	ROI / NI
IE0000849	Spahill and Clomantagh Hill	ROI
IE0000859	Clonaslee Eskers and Derry Bog	ROI
IE0000869	Lisbigney Bog	ROI
IE0000919	Ridge Road, SW of Rapemills	ROI
IE0000925	The Long Derries, Edenderry	ROI
IE0000930	Clare Glen	ROI
IE0000934	Kilduff, Devilsbit Mountain	ROI
IE0000939	Silvermine Mountains	ROI
IE0000979	Corratirrim	ROI
IE0000994	Ballyteige (Clare)	ROI
IE0000996	Ballyvaughan Turlough	ROI
IE0001013	Glenomra Wood	ROI
IE0001021	Carrowmore Point to Spanish Point and Islands	ROI
IE0001040	Barley Cove to Ballyrisode Point	ROI
IE0001043	Cleanderry Wood	ROI
IE0001058	Great Island Channel	ROI
IE0001061	Kilkeran Lake and Castlefreke Dunes	ROI
IE0001070	Myross Wood	ROI
IE0001090	Ballyness Bay	ROI
IE0001107	Coolvoy Bog	ROI
IE0001125	Dunragh Loughs/Pettigo Plateau	ROI
IE0001141	Gweedore Bay and Islands	ROI
IE0001151	Kindrum Lough	ROI
IE0001179	Muckish Mountain	ROI
IE0001190	Sheephaven	ROI
IE0001195	Termon Strand	ROI
IE0001197	Keeper Hill	ROI
IE0001209	Glenasmole Valley	ROI
IE0001228	Aughrusbeg Machair and Lake	ROI
IE0001230	Courtmacsherry Estuary	ROI
IE0001242	Carrownagappul Bog	ROI
IE0001251	Cregduff Lough	ROI
IE0001257	Dog's Bay	ROI
IE0001271	Gortnandarragh Limestone Pavement	ROI
IE0001275	Inisheer Island	ROI
IE0001285	Kiltiernan Turlough	ROI
IE0001309	Omey Island Machair	ROI
IE0001311	Rusheenduff Lough	ROI
IE0001312	Ross Lake and Woods	ROI
IE0001313	Rosturra Wood	ROI
IE0001321	Termon Lough	ROI
IE0001342	Cloonee and Inchiquin Loughs, Uragh Wood	ROI

Site Code	Site Name	ROI / NI
IE0001371	Mucksna Wood	ROI
IE0001387	Ballynafagh Lake	ROI
IE0001398	Rye Water Valley/Carton	ROI
IE0001403	Arroo Mountain	ROI
IE0001430	Glen Bog	ROI
IE0001432	Glenstal Wood	ROI
IE0001459	Clogher Head	ROI
IE0001482	Clew Bay Complex	ROI
IE0001497	Doogort Machair/Lough Doo	ROI
IE0001501	Erris Head	ROI
IE0001513	Keel Machair/Menaun Cliffs	ROI
IE0001529	Lough Cahasy, Lough Baun and Roonah Lough	ROI
IE0001536	Mocorha Lough	ROI
IE0001547	Castletownshend	ROI
IE0001571	Urlaur Lakes	ROI
IE0001625	Castlesampson Esker	ROI
IE0001626	Annaghmore Lough (Roscommon)	ROI
IE0001637	Four Roads Turlough	ROI
IE0001656	Bricklieve Mountains & Keishcorran	ROI
IE0001669	Knockalongy and Knockachree Cliffs	ROI
IE0001673	Lough Arrow	ROI
IE0001680	Streedagh Point Dunes	ROI
IE0001683	Liskeenan Fen	ROI
IE0001741	Kilmuckridge-Tinnaberna Sandhills	ROI
IE0001742	Kilpatrick Sandhills	ROI
IE0001757	Holdenstown Bog	ROI
IE0001766	Magherabeg Dunes	ROI
IE0001774	Lough Carra/Mask Complex	ROI
IE0001776	Pilgrim's Road Esker	ROI
IE0001786	Kilroosky Lough Cluster	ROI
IE0001810	White Lough, Ben Loughs and Lough Doo	ROI
IE0001818	Lough Forbes Complex	ROI
IE0001831	Split Hills and Long Hill Esker	ROI
IE0001847	Philipston Marsh	ROI
IE0001858	Galmoy Fen	ROI
IE0001873	Derryclogher (Knockboy) Bog	ROI
IE0001879	Glanmore Bog	ROI
IE0001880	Meenaguse Scragh	ROI
IE0001881	Maulagowna Bog	ROI
IE0001890	Mullaghanish Bog	ROI
IE0001898	Unshin River	ROI
IE0001899	Cloonakillina Lough	ROI

Site Code	Site Name	ROI / NI
IE0001912	Glendree Bog	ROI
IE0001913	Sonnagh Bog	ROI
IE0001919	Glenade Lough	ROI
IE0001922	Bellacorick Bog Complex	ROI
IE0001926	East Burren Complex	ROI
IE0001932	Mweelrea/Sheeffry/Erriff Complex	ROI
IE0001952	Comeragh Mountains	ROI
IE0001955	Croaghaun/Slievemore	ROI
IE0001957	Boyne Coast and Estuary	ROI
IE0001975	Ballyhoorisky Point to Fanad Head	ROI
IE0001976	Lough Gill	ROI
IE0001992	Tamur Bog	ROI
IE0002005	Bellacragher Saltmarsh	ROI
IE0002006	Ox Mountains Bogs	ROI
IE0002008	Maumturk Mountains	ROI
IE0002010	Old Domestic Building (Keevagh)	ROI
IE0002012	North Inishowen Coast	ROI
IE0002031	The Twelve Bens/Garraun Complex	ROI
IE0002032	Boleybrack Mountain	ROI
IE0002034	Connemara Bog Complex	ROI
IE0002036	Ballyhoura Mountains	ROI
IE0002037	Carrigeenamronety Hill	ROI
IE0002041	Old Domestic Building, Curraglass Wood	ROI
IE0002047	Cloghernagore Bog and Glenveagh National Park	ROI
IE0002070	Tralee Bay and Magharees Peninsula, West to Cloghane	ROI
IE0002074	Slyne Head Peninsula	ROI
IE0002081	Ballinafad	ROI
IE0002091	Newhall and Edenvale Complex	ROI
IE0002098	Old Domestic Building, Askive Wood	ROI
IE0002110	Corliskea/Trien/Cloonfelliv Bog	ROI
IE0002111	Kilkieran Bay and Islands	ROI
IE0002112	Ballyseedy Wood	ROI
IE0002117	Lough Coy	ROI
IE0002118	Barnahallia Lough	ROI
IE0002119	Lough Nageeron	ROI
IE0002120	Lough Bane and Lough Glass	ROI
IE0002121	Lough Lene	ROI
IE0002122	Wicklow Mountains	ROI
IE0002123	Ardmore Head	ROI
IE0002124	Bolingbrook Hill	ROI
IE0002125	Anglesey Road	ROI
IE0002126	Pollagoona Bog	ROI

Site Code	Site Name	ROI / NI
IE0002129	Murvey Machair	ROI
IE0002130	Tully Lough	ROI
IE0002135	Lough Nageage	ROI
IE0002137	Lower River Suir	ROI
IE0002141	Mountmellick	ROI
IE0002144	Newport River	ROI
IE0002147	Lisduff Fen	ROI
IE0002157	Newgrove House	ROI
IE0002158	Kenmare River	ROI
IE0002159	Mulroy Bay	ROI
IE0002161	Long Bank	ROI
IE0002162	River Barrow and River Nore	ROI
IE0002164	Lough Golagh and Breesy Hill	ROI
IE0002165	Lower River Shannon	ROI
IE0002170	Blackwater River (Cork/Waterford)	ROI
IE0002171	Bandon River	ROI
IE0002172	Blasket Islands	ROI
IE0002173	Blackwater River (Kerry)	ROI
IE0002176	Leannan River	ROI
IE0002177	Lough Dahybaun	ROI
IE0002179	Towerhill House	ROI
IE0002180	Gortacarnaun Wood	ROI
IE0002181	Drummin Wood	ROI
IE0002185	Slieve Mish Mountains	ROI
IE0002187	Drongawn Lough	ROI
IE0002189	Farranamanagh Lough	ROI
IE0002193	Ireland's Eye	ROI
IE0002213	Glenloughaun Esker	ROI
IE0002214	Killeglan Grassland	ROI
IE0002236	Island Fen	ROI
IE0002241	Lough Derg, North-East Shore	ROI
IE0002243	Clare Island Cliffs	ROI
IE0002244	Ardrahan Grassland	ROI
IE0002245	Old Farm Buildings, Ballymacrogan	ROI
IE0002246	Ballycullinan, Old Domestic Building	ROI
IE0002247	Toonagh Estate	ROI
IE0002249	The Murrough Wetlands	ROI
IE0002250	Carrowmore Dunes	ROI
IE0002252	Thomastown Quarry	ROI
IE0002256	Ballyprior Grassland	ROI
IE0002257	Moanour Mountain	ROI
IE0002258	Silvermines Mountains West	ROI

Site Code	Site Name	ROI / NI
IE0002259	Tory Island Coast	ROI
IE0002261	Magharee Islands	ROI
IE0002262	Valencia Harbour/Portmagee Channel	ROI
IE0002263	Kerry Head Shoal	ROI
IE0002264	Kilkee Reefs	ROI
IE0002265	Kingstown Bay	ROI
IE0002268	Achill Head	ROI
IE0002269	Carnsore Point	ROI
IE0002274	Wicklow Reef	ROI
IE0002279	Askeaton Fen Complex	ROI
IE0002280	Dunbeacon Shingle	ROI
IE0002281	Reen Point Shingle	ROI
IE0002283	Rutland Island and Sound	ROI
IE0002287	Lough Swilly	ROI
IE0002293	Carrowbaun, Newhall and Ballylee Turloughs	ROI
IE0002294	Cahermore Turlough	ROI
IE0002295	Ballinduff Turlough	ROI
IE0002296	Williamstown Turloughs	ROI
IE0002298	River Moy	ROI
IE0002299	River Boyne and River Blackwater	ROI
IE0002301	River Finn	ROI
IE0002303	Dunmuckrum Turloughs	ROI
IE0002306	Carlingford Shore	ROI
IE0002312	Slieve Bernagh Bog	ROI
IE0002313	Ballymore Fen	ROI
IE0002314	Old Domestic Buildings, Rylane	ROI
IE0002315	Glanlough Woods	ROI
IE0002316	Ratty River Cave	ROI
IE0002317	Cregg House Stables, Crusheen	ROI
IE0002318	Knockanira House	ROI
IE0002319	Kilkishen House	ROI
IE0002320	Kildun Souterrain	ROI
IE0002324	Glendine Wood	ROI
IE0002327	Belgica Mound Province	ROI
IE0002328	Hovland Mound Province	ROI
IE0002329	South-West Porcupine Bank	ROI
IE0002330	North-West Porcupine Bank	ROI
IE0002331	Mouds Bog	ROI
IE0002332	Coolrain Bog	ROI
IE0002333	Knockacoller Bog	ROI
IE0002336	Carn Park Bog	ROI
IE0002337	Crosswood Bog	ROI

Site Code	Site Name	ROI / NI
IE0002338	Drumalough Bog	ROI
IE0002339	Ballynamona Bog and Corkip Lough	ROI
IE0002340	Moneybeg and Clareisland Bogs	ROI
IE0002341	Ardagullion Bog	ROI
IE0002342	Mount Hevey Bog	ROI
IE0002343	Tullaher Lough and Bog	ROI
IE0002346	Brown Bog	ROI
IE0002347	Camderry Bog	ROI
IE0002348	Clooneen Bog	ROI
IE0002349	Corbo Bog	ROI
IE0002350	Curraghlehanagh Bog	ROI
IE0002351	Moanveanlagh Bog	ROI
IE0002352	Monivea Bog	ROI
IE0002353	Redwood Bog	ROI
IE0002354	Tullaghanrock Bog	ROI
IE0002356	Ardgraigue Bog	ROI
UK0016599	Ballynahone Bog	NI
UK0016603	Cuilcagh Mountain	NI
UK0016606	Garron Plateau	NI
UK0016607	Pettigoe Plateau	NI
UK0016608	Teal Lough	NI
UK0016609	Black Bog	NI
UK0016610	Garry Bog	NI
UK0016611	Fairy Water Bogs	NI
UK0016612	Murlough	NI
UK0016613	Magilligan	NI
UK0016614	Upper Lough Erne	NI
UK0016615	Eastern Mournes	NI
UK0016618	Strangford Lough	NI
UK0016619	Monawilkin	NI
UK0016620	Derryleckagh	NI
UK0016621	Magheraveely Marl Loughs	NI
UK0016622	Slieve Beagh	NI
UK0030045	Largalinny	NI
UK0030047	Lough Melvin	NI
UK0030055	Rathlin Island	NI
UK0030068	Fardrum and Roosky Turloughs	NI
UK0030083	Banagher Glen	NI
UK0030084	Bann Estuary	NI
UK0030089	Binevenagh	NI
UK0030097	Breen Wood	NI
UK0030110	Carn-Glenshane Pass	NI
UK0030116	Cladagh (Swanlinbar) River	NI
UK0030169	Hollymount	NI
UK0030180	Lecale Fens	NI
UK0030199	Main Valley Bogs	NI

Site Code	Site Name	ROI / NI
UK0030211	Moneygal Bog	NI
UK0030212	Moninea Bog	NI
UK0030214	Montiaghs Moss	NI
UK0030224	North Antrim Coast	NI
UK0030233	Owenkillew River	NI
UK0030236	Peatlands Park	NI
UK0030244	Rea's Wood and Farr's Bay	NI
UK0030268	Rostrevor Wood	NI
UK0030277	Slieve Gullion	NI
UK0030291	Turmennan	NI
UK0030296	Upper Ballinderry River	NI
UK0030300	West Fermanagh Scarplands	NI
UK0030303	Wolf Island Bog	NI
UK0030318	Aughnadarragh Lough	NI
UK0030319	Ballykilbeg	NI
UK0030320	River Foyle and Tributaries	NI
UK0030321	Cranny Bogs	NI
UK0030322	Curran Bog	NI
UK0030323	Dead Island Bog	NI
UK0030324	Deroran Bog	NI
UK0030325	Tonnagh Beg Bog	NI
UK0030326	Tully Bog	NI
UK0030360	River Roe and Tributaries	NI
UK0030361	River Faughan and Tributaries	NI
UK0030365	Red Bay	NI
UK0030383	Skerries and Causeway	NI
UK0030384	The Maidens	NI

Table 2: SPAs that were considered in the Appropriate Assessment Screening of the WSSP.

Site Code	Site Name	ROI / NI
800004002	Saltee Islands	ROI
800004003	Puffin Island	ROI
800004004	Inishkea Islands	ROI
800004005	Cliffs Of Moher	ROI
800004006	North Bull Island	ROI
800004007	Skelligs	ROI
800004008	Blasket Islands	ROI
800004009	Lady's Island Lake	ROI
800004013	Drumcliff Bay	ROI
800004014	Rockabill	ROI
800004015	Rogerstown	ROI
800004016	Baldoyle Bay	ROI
800004019	The Raven	ROI
800004020	Ballyteigue Burrow	ROI
800004021	Old Head Of Kinsale	ROI
800004022	Ballycotton Bay	ROI
800004023	Ballymacoda Bay	ROI
800004024	South Dublin Bay And River Tolka Estuary	ROI
800004025	Malahide Estuary	ROI
800004026	Dundalk Bay	ROI
800004027	Tramore Back Strand	ROI
800004028	Blackwater Estuary	ROI
800004029	Castlemaine Harbour	ROI
800004030	Cork Harbour	ROI
800004031	Inner Galway Bay	ROI
800004032	Dungarvan Harbour	ROI
800004033	Bannow Bay	ROI
800004034	Trawbreaga Bay	ROI
800004035	Cummeen Strand	ROI
800004036	Killala Bay/Moy Estuary	ROI
800004037	Blacksod Bay/Broadhaven	ROI
800004039	Derryveagh And Glendowan Mountains SPA	ROI
800004040	Wicklow Mountains	ROI
800004041	Ballyallia Lough	ROI
800004042	Lough Corrib	ROI
800004043	Lough Derravaragh	ROI
800004044	Lough Ennell	ROI
800004045	Glen Lough	ROI
800004046	Lough Iron	ROI
800004047	Lough Owel	ROI
800004048	Lough Gara	ROI
800004049	Lough Oughter	ROI
800004050	Lough Arrow	ROI

Site Code	Site Name	ROI / NI
800004051	Lough Carra	ROI
800004052	Carrowmore Lake	ROI
800004056	Lough Cutra	ROI
800004057	Lough Derg (Donegal)	ROI
800004058	Lough Derg (Shannon)	ROI
800004060	Lough Fern	ROI
800004061	Lough Kinale And Derragh Lough	ROI
800004062	Lough Mask	ROI
800004063	Poulaphouca Reservoir	ROI
800004064	Lough Ree	ROI
800004065	Lough Sheelin	ROI
800004066	The Bull And The Cow Rocks	ROI
800004068	Inishmurray	ROI
800004069	Lambay Island	ROI
800004072	Stags Of Broad Haven	ROI
800004073	Tory Island SPA	ROI
800004074	Illanmaster	ROI
800004075	Lough Swilly	ROI
800004076	Wexford Harbour And Slobs	ROI
800004077	River Shannon And River Fergus Estuaries	ROI
800004078	Carlingford Lough	ROI
800004080	Boyne Estuary	ROI
800004081	Clonakilty Bay	ROI
800004082	Greers Isle	ROI
800004083	Inishbofin, Inishdooey And Inishbeg SPA	ROI
800004084	Inishglora And Inishkeeragh	ROI
800004086	River Little Brosna Callows	ROI
800004087	Lough Foyle	ROI
800004089	Rahasane Turlough	ROI
800004090	Sheskinmore Lough	ROI
800004091	Stabannan-Braganstown	ROI
800004092	Tacumshin Lake	ROI
800004093	Termoncarragh Lake And Annagh Machair	ROI
800004094	Blackwater Callows	ROI
800004095	Kilcolman Bog	ROI
800004096	Middle Shannon Callows	ROI
800004097	River Suck Callows	ROI
800004098	Owenduff/Nephin Complex	ROI
800004100	Inishtrahull	ROI
800004107	Coole-Garryland	ROI
800004110	Lough Nillan Bog	ROI
800004111	Duvillaun Islands	ROI
800004113	Howth Head Coast	ROI
800004114	Illaunonearaun	ROI

Site Code	Site Name	ROI / NI
800004115	Inishduff	ROI
800004116	Inishkeel	ROI
800004117	Ireland's Eye	ROI
800004118	Keeragh Islands	ROI
800004119	Loop Head	ROI
800004120	Rathlin O'birne Island	ROI
800004121	Roaninish	ROI
800004122	Skerries Islands	ROI
800004124	Sovereign Islands	ROI
800004125	Magharee Islands	ROI
800004129	Ballysadare Bay	ROI
800004132	Illancrone And Inishkeeragh	ROI
800004134	Lough Rea	ROI
800004135	Ardboline Island And Horse Island	ROI
800004136	Clare Island	ROI
800004137	Dovegrove Callows	ROI
800004139	Lough Croan Turlough	ROI
800004140	Four Roads Turlough	ROI
800004142	Cregganna Marsh	ROI
800004143	Cahore Marshes	ROI
800004144	High Island, Inishshark And Davillaun	ROI
800004145	Durnesh Lough	ROI
800004146	Malin Head SPA	ROI
800004148	Fanad Head SPA	ROI
800004149	Falcarragh To Meenlaragh SPA	ROI
800004150	West Donegal Coast	ROI
800004151	Donegal Bay	ROI
800004152	Inishmore	ROI
800004153	Dingle Peninsula	ROI
800004154	Iveragh Peninsula	ROI
800004155	Beara Peninsula	ROI
800004156	Sheep's Head To Toe Head	ROI
800004158	River Nanny Estuary And Shore -	ROI
800004159	Slyne Head To Ardmore Point Islands	ROI
800004160	Slieve Bloom Mountains	ROI
800004161	Stack's To Mullaghareirk Mountains	ROI
800004162	Mullaghanish To Musheramore Mountains	ROI
800004165	Slievefelim To Silvermines Mountains	ROI
800004167	Slieve Beagh	ROI
800004168	Slieve Aughty Mountains	ROI
800004170	Cruagh Island	ROI
800004172	Dalkey Islands	ROI
800004175	Deenish Island And Scariff Island	ROI
800004177	Bills Rocks	ROI

Site Code	Site Name	ROI / NI
800004181	Connemara Bog Complex	ROI
800004182	Mid Clare Coast	ROI
800004186	The Murrough	ROI
800004187	Sligo/Leitrim Uplands	ROI
800004188	Tralee Bay Complex	ROI
800004189	Kerry Head	ROI
800004190	Galley Head To Duneen Point	ROI
800004191	Seven Heads	ROI
800004192	Helvick Head To Ballyquin	ROI
800004193	Mid-Waterford Coast	ROI
800004194	Horn Head To Fanad Head	ROI
800004212	Cross Lough (Killadoon)	ROI
800004219	Courtmacsherry Bay	ROI
800004220	Corofin Wetlands	ROI
800004221	Illaunnanoon	ROI
800004227	Mullet Peninsula	ROI
800004228	Lough Conn And Lough Cullin	ROI
800004230	West Donegal Islands SPA	ROI
800004231	Inishbofin, Omey Island And Turbot Island SPA	ROI
800004232	River Boyne And River Blackwater SPA	ROI
800004233	River Nore SPA	ROI
800004234	Ballintemple And Ballygilgan SPA	ROI
800004235	Doogort Machair SPA	ROI
UK9020301	Antrim Hills	NI
UK9020101	Belfast Lough	NI
UK9020290	Belfast Lough Open Water	NI
UK9020161	Carlingford Lough	NI
UK9020291	Copeland Islands	NI
UK9020221	Killough Bay	NI
UK9020042	Larne Lough	NI
UK9020031	Lough Foyle	NI
UK9020091	Lough Neagh And Lough Beg	NI
UK9020271	Outer Ards	NI
UK9020051	Pettigoe Plateau	NI
UK9020011	Rathlin Island	NI
UK9020021	Sheep Island	NI
UK9020302	Slieve Beagh – Mullaghfad – Lisnaskea	NI
UK9020111	Strangford Lough	NI
UK9020071	Upper Lough Erne	NI