Screening Determination Statement

The assessment of significance of effects:

Describe how the proposed development (alone or in-combination) is/is **not likely** to have **significant** effects on European site(s) in view of its conservation objectives.

The potential impacts of the proposed borehole drilling at Kilmore, Co. Kerry has been considered in the context of the relevant identified European Sites, their Qualifying Interests and Special Conservation Interests and any Conservation Objectives which have been set.

From the findings of the Screening exercise, it is concluded that the proposed project is not directly connected with or necessary to the management of any European site.

Therefore, an Appropriate Assessment Screening was prepared to identify the potential for likely significant effects on the qualifying features of any European Sites.

The findings of the screening exercise determined that drilling activities and ongoing monitoring will not give rise to potential significant effects on the Qualifying Interests or Special Conservation Interests of any European site.

Having regard to the methodology employed and the findings of this screening exercise, it has been concluded that Stage 2 Appropriate Assessment is not required in accordance with Section 42(7) of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended).

Conclusion:

	Tick as Appropriate:	**Recommendation:**
(i) It is clear that there is **no likelihood** of significant effects on a European site.	✓	The proposal can be screened out: Appropriate assessment not required.
(ii) It is **uncertain** whether the proposal will have a significant effect on a European site.		.. Request further information to complete screening .. Request NIS .. Refuse planning permission
(iii) **Significant effects** are likely.		.. Request NIS .. Refuse planning permission
Signature and Date of Recommending Officer:	Ted McCormack	
Signature and Date of the Decision Maker:		

National Parks and Wildlife Service

Drilling of boreholes at Kilmore, Co. Kerry

Report to inform Screening for Appropriate Assessment

794-NI-WAE-02225

F01

26 May 2026

TETRA TECH

Tetra Tech Belfast, Elmwood House, 74 Boucher Road, Belfast, BT12 6RZ, Northern Ireland

Tetra Tech Consulting Limited. Registered in England: No.01470149
Registered Office: 101 Park Drive, Milton Park, Abingdon, Oxfordshire, England, OX14 4RY

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Prepared by	Prepared for
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1.0 Introduction

The Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora) introduced an obligation for Member States to establish Sites of Community Interest (SCIs) representing areas of high importance for rare and threatened habitats and species, and together comprising a network of 'Natura 2000' sites across the EU. The Natura 2000 network of sites in Ireland includes Special Areas of Conservation (SACs), designated under Irish legislation transposing the Habitats Directive, as well as Special Protection Areas (SPAs), as classified under the Birds Directive (Directive 2009/147/EC) and designated under Irish legislation; together these can be referred to as European sites. SACs have been designated for the conservation of Annex I habitats and Annex II species considered to be of community importance for conservation, while SPAs have been designated for the conservation of Annex I birds and other regularly occurring migratory birds and their supporting habitats. Those considered representative for site designation are termed Qualifying Interests (QIs) for SACs, and Special Conservation Interests (SCIs) for SPAs; for each site conservation objectives have been established to provide protection.

Tetra Tech Consulting Limited (Tetra Tech) was commissioned by NPWS to prepare a report to inform Appropriate Assessment Screening in relation to the proposed drilling and installation of a borehole in the townland of Kilmore, adjacent to the R560 Conor Pass, Mount Brandon, Co. Kerry.

This report aims to inform Appropriate Assessment Screening to establish the potential for likely significant effects from the proposed project on the network of European Sites.

This report provides relevant information to the Competent Authority in order for it to determine whether the Proposed Works are likely to have a significant effect on the integrity of any European site.

1.1 Appropriate Assessment

The 'Habitats Directive' (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora) provides a framework for the legal protection of habitats and species of European importance. Under the articles of the Directive, it is necessary to undertake an **appropriate assessment** of a plan or project to determine whether it will have a 'likely significant effect' on sites designated at an international level for their nature conservation value. Article 6(3) of the Habitats Directive requires that –

> *"Any plan or project not directly connected with or necessary to the management of the [European] site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national*

authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."

Thus, Article 6(3) provides a two-stage process:

a) The first stage involves a screening for appropriate assessment; and

b) The second stage arises where, having screened the proposed development, the competent authority determines that an appropriate assessment is required, in which case it must then carry out that appropriate assessment.

For the purposes of applications for planning permission, Part XAB of the 2000 Act implemented the obligations under Article 6(3) into Irish law. In relation to other permitting regimes or where the competent authority is the project proponent, the provisions of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended ("the 2011 Regulations"), transpose those obligations.

1.2 Screening for Appropriate Assessment

Section 177U of the 2000 Act requires *inter alia* that a screening for appropriate assessment of an application for consent for proposed development shall be carried out by the competent authority to assess, in view of best scientific knowledge, if that proposed development, individually or in combination with another plan or project is likely to have a significant effect on a European site. While the provisions of section 177U adopt the terminology used in Article 6(3) of the Habitats Directive in terms of the test for screening, section 177U expands on this, in light of the interpretation given in decisions of the Court of Justice of the European Union. Thus, section 177U give effect to the requirement to screen an application for development consent for appropriate assessment by assessing whether the proposed development is likely to have a significant effect on a European site by considering whether such a significant effect can or cannot be excluded.

Regulation 42 of the 2011 Regulations requires *inter alia* that screening for appropriate assessment of a project, which is not directly connected with or necessary to the management of the site as a European Site, shall be carried out by the public authority to assess, in view of best scientific knowledge and in view of the conservation objectives of the site, if that project, individually or in combination with other plans or projects, is likely to have a significant effect on the European site.

1.3 Appropriate Assessment

Section 177V of the 2000 Act requires *inter alia* that an appropriate assessment carried out by the competent authority shall include a determination under Article 6(3) of the Habitats Directive as to whether or not a proposed development would adversely affect the integrity of a European site and an appropriate assessment shall be carried out by the competent authority where it has made a determination under section 177U(4) that an appropriate assessment is required, before consent is given for the proposed development.

1.4 The Appropriate Assessment Process

According to European Commission guidance documents '*Assessment of plans and projects significantly affecting Natura 2000 sites'* (EC, 2001) and '*Managing Natura 2000 sites: The Provisions of Article 6 of the 'Habitats' Directive 92/43/EEC'* (EC, 2019), the obligations arising under Article 6 establish a step-wise procedure as follows:

- The first part of this procedure consists of a pre-assessment stage ('screening') to determine whether, firstly, a plan or project is directly connected with or necessary to the management of the site, and secondly, whether it is likely to have a significant effect on the site; it is governed by the first sentence of Article 6(3).
- The second part of the procedure, governed by the second sentence of Article 6(3), relates to the appropriate assessment and the decision of the competent national authorities.
- A third part of the procedure (governed by Article 6(4)) comes into play if, despite a negative assessment, it is proposed not to reject a plan or project but to give it further consideration. In this case Article 6(4) allows for derogations from Article 6(3) under certain conditions.

The extent to which the sequential steps of Article 6(3) applies to a given plan or project depends on several factors, and in the sequence of steps, each step is influenced by the previous step. The order in which the steps are followed is therefore essential for the correct application of Article 6(3).

Each step determines whether a further step in the process is required. If, for example, the conclusion at the end of a Habitats Directive stage one screening appraisal is that significant effects on European sites can be excluded, there is no requirement to proceed to the next step.

2.0 Appropriate assessment methodology

2.1 Guidance on Appropriate Assessment

Appropriate Assessment Guidelines for Planning Authorities have been published by the Department of the Environment Heritage and Local Government (DEHLG, 2010a). In addition to the advice available from the Department, the European Commission has published a number of documents which provide a significant body of guidance on the requirements of Appropriate Assessment, most notably including, '*Managing Natura 2000 sites – the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC*' (EC, 2019), which sets out the principles of how to approach decision making during the process, and updates the guidance taking into account current and relevant case law, including a number of recent judgements handed down in the European courts in respect of the interpretation of the Habitats and Birds Directives.

These principal national and European guidelines have been followed in the preparation of this stage one screening appraisal. The following list identifies these and other pertinent guidance documents:

- Communication from the Commission on the Precautionary Principle, Office for Official Publications of the European Communities, Luxembourg (EC, 2000a);
- Managing Natura 2000 Sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC, Office for Official Publications of the European Communities, Luxembourg (EC, 2019);
- Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Articles 6(3) and (4) of the Habitats Directive 92/43/EEC. Office for Official Publications of the European Communities, Brussels (EC, 2021);
- Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC – Clarification of the concepts of: alternative solutions, imperative reasons of overriding public interest, compensatory measures, overall coherence, opinion of the commission; (EC, 2007);
- Appropriate Assessment of Plans and Projects in Ireland. Guidance for Planning Authorities. Department of the Environment, Heritage and Local Government, Dublin (DEHLG, 2010a);
- Department of Environment Heritage and Local Government Circular NPW 1/10 and PSSP 2/10 on Appropriate Assessment under Article 6 of the Habitats Directive – Guidance for Planning Authorities (DEHLG, 2010b);
- Interpretation Manual of European Union Habitats. Version EUR 28. European Commission (EC, 2013);

- Marine Natura Impact Statements in Irish Special Areas of Conservation - A Working Document (NPWS 2012); and
- National Parks & Wildlife Service (2020) Guidance on Appropriate Assessment for Planning Authorities.
- Office of the Planning Regulator Practice Note (PN01) Appropriate Assessment Screening for Development Management' (OPR, 2021).

2.2 Likely Significant Effect

The Commission's 2018 Notice (EC, 2019) advises that the appropriate assessment procedure under Article 6(3) is triggered not by the certainty but by the likelihood of significant effects, arising from plans or projects regardless of their location inside or outside a protected site. Such likelihood exists if significant effects on the site cannot be excluded. The significance of effects should be determined in relation to the specific features and environmental conditions of the site concerned by the plan or project, taking particular account of the site's conservation objectives and ecological characteristics.

The requirement that the effect in question be 'significant' exists in order to lay down a *de minimis* threshold – thus, plans or projects that have no appreciable effect on the site are thereby excluded.

A likely significant effect is triggered when:

- there is a probability or a risk of a plan or project having a significant effect on a European site;
- the plan is likely to undermine the site's conservation objectives; and
- a significant effect cannot be excluded on the basis of objective information.

2.3 Mitigation Measures

In determining whether or not likely significant effects will occur or can be excluded in the stage one appraisal, measures intended to avoid or reduce the harmful effects of the proposed development on European sites, (i.e. "mitigation measures") or best practice measures have not been taken into account in this screening stage appraisal. This approach is consistent with EU guidance and the case law of the Court of Justice of the European Union:

- In April 2018, the Court of Justice of the European Union issued a ruling in case C-323/17 People Over Wind & Peter Sweetman v Coillte Teoranta ("People Over Wind") that Article 6(3) of Directive 92/43/EEC must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that site.

- The judgment in People Over Wind is further reinforced in EC (2019) and EC (2021) which refers to CJEU Case C-323/17.

2.4 Consideration of Ex-situ Effects

EC (2019) advises that Member States, both in their legislation and in their practice, allow for the Article 6(3) safeguards to be applied to any development pressures - including those which are external to European sites but which are likely to have significant effects on any of them.

The CJEU developed this point when it issued a ruling in case C-461/17 ("Brian Holohan and Others v An Bord Pleanála") that determined *inter alia* that Article 6(3) of Directive 92/43/EEC must be interpreted as meaning that an appropriate assessment must on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.

In that regard, consideration has been given in this Habitats Directive stage one screening appraisal to implications for habitats and species located both inside and outside of the European sites considered in the screening appraisal with reference to those sites' Conservation Objectives where effects upon those habitats and/or species are liable to affect the conservation objectives of the sites concerned.

2.5 Conservation Objectives for European Sites

The conservation objectives for European sites are to maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the site has been selected.

The favourable conservation status of a habitat is achieved when:

- its natural range, and area it covers within that range, are stable or increasing;
- the specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future; and
- the conservation status of its typical species is favourable.

The favourable conservation status (or condition, at a site level) of a species is achieved when:

- population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats;
- the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future; and

- there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

The published SSCO documents note that an appropriate assessment based on the most up to date conservation objectives will remain valid even if the targets are subsequently updated, providing they were the most recent objectives available when the assessment was carried out. The most up-to-date Conservation Objectives for the European sites being considered in this appraisal have been applied to the analysis documented in this report and are clearly identified by their date of publication on a site-by-site basis. These were accessed from the National Parks and Wildlife Service (NPWS) website www.npws.ie in May 2026.

2.6 Consideration of In-combination Effects

Article 6(3) of the Habitats Directive requires that in-combination effects with other plans or projects are also considered. As set out in the Commission's 2018 Notice (EC, 2019), significance will vary depending on factors such as magnitude of impact, type, extent, duration, intensity, timing, probability, cumulative effects and the vulnerability of the habitats and species concerned. Whilst the Directive does not explicitly define which other plans and projects are within the scope of the in-combination provision of Article 6(3), it is important to note that the underlying intention of this provision is to take account of cumulative impacts, and these will often only occur over time.

In that context, one can consider plans or projects which are completed, approved but uncompleted, or proposed. EC (2019) specifically advises that "*as regards other proposed plans or projects, on grounds of legal certainty it would seem appropriate to restrict the in-combination provision to those which have been actually proposed, i.e. for which an application for approval or consent has been introduced*".

OPR (2021) advises that plans and projects that are not yet proposed "*do not generally have to be taken into account in the assessment of in-combination effects, even if they are part of an overarching masterplan. The exception is where the project is considered to be functionally interdependent with the development before the competent authority*".

The Practice Note goes on to stipulate that in-combination effects must examine plans or projects that are:

- Projects completed;
- Projects approved but not started, or uncompleted;
- Projects proposed, i.e., for which an application for approval or consent has been made, including refusals subject to appeal and not yet determined;
- Proposals in adopted plans; and
- Proposals in finalised draft plans formally published or submitted for consultation or adoption.

This report is based on review of desktop data. No additional field surveys were carried out to inform this report.

Sources of information utilised for this report and accessed during May 2026 include the following:

- National Parks & Wildlife Service (NPWS) Designations Viewer;
- NPWS Site-specific conservation objectives and mapping (npws.ie);
- Site Specific Conservation Objectives -Spatial Data (March 2025) (npws.ie);
- National Biodiversity Data Centre (NBDC) Maps.

3.0 Project Description

The proposed project involves the drilling of a shallow and deep borehole pair in the townland of Kilmore, adjacent to the R560 Conor Pass, Co. Kerry by the Geological Survey of Ireland (GSI). The monitoring boreholes will serve to record groundwater levels over time and will be incorporated in a strategic, national groundwater monitoring network which GSI plans to operate and maintain in the long-term (>20 years).

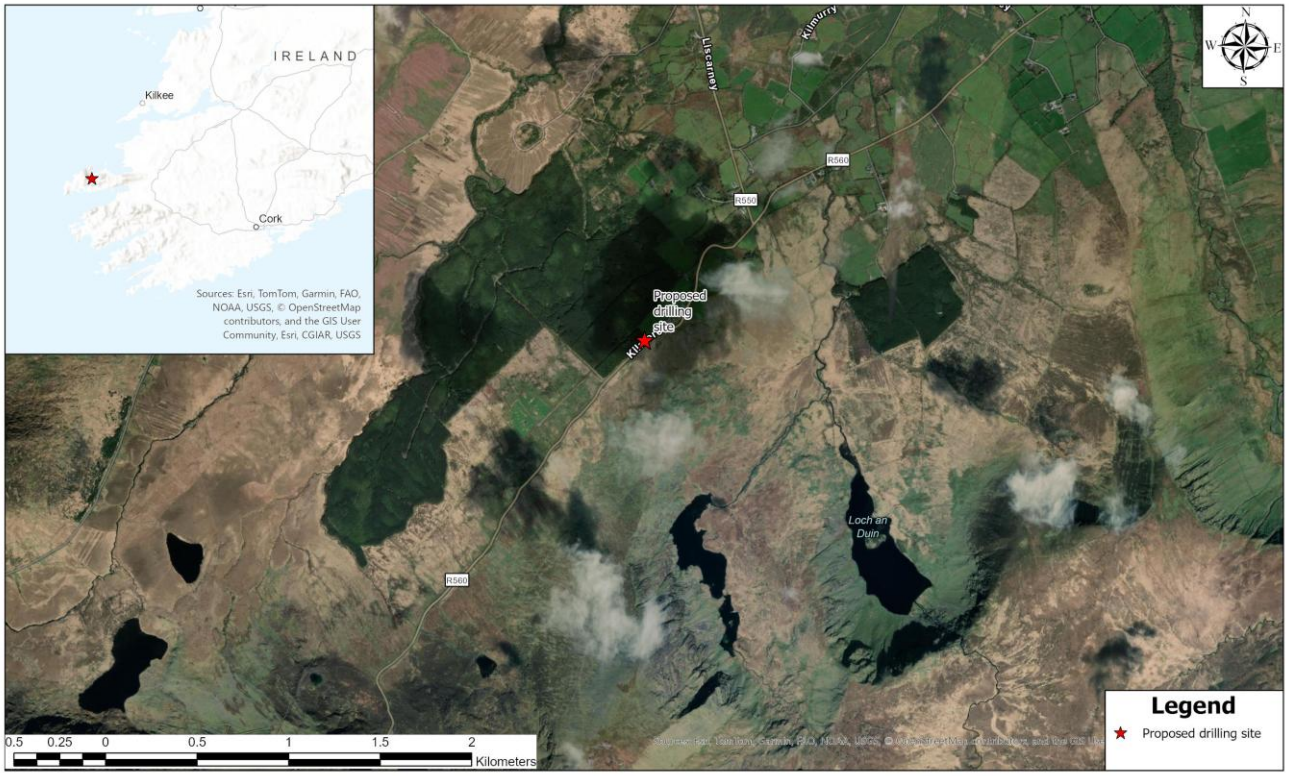


Figure 3-1 Location of the proposed drilling site at Kilmore, Co. Kerry

In addition, the recorded data will be used by NPWS to assess the influence of deep groundwater levels on the habitats of Mount Brandon SAC, particularly the nearby peatland habitats including 7130 Blanket bogs (*if active bog), which will be used to inform conservation measures and management of the site.

The proposed monitoring borehole will be drilled on an area of open ground at the entrance to a coniferous forestry plantation, outside the boundary of Mount Brandon SAC. The selected site was agreed between personnel from GSI and NPWS based on optimum location for monitoring, incorporating the sensitivity of the site.

The adjacent Mount Brandon SAC (000375) comprises an extensive upland site in west Co. Kerry, centred on Mount Brandon and extending across a broad mountainous landscape on the Dingle Peninsula. The site encompasses a large tract of open mountain and coastal terrain, with marked variation in altitude, slope, exposure, geology and hydrology giving rise

to a diverse range of habitats. It includes substantial areas of blanket bog, wet heath and dry heath, together with alpine and boreal heath on the upper slopes and ridges, species-rich *Nardus* grassland, siliceous scree, calcareous and siliceous rocky slopes, oligotrophic lakes and vegetated sea cliffs. This diversity of upland and coastal habitats makes the site one of the most important montane systems in south-west Ireland.

The blanket bog of Mount Brandon is among the principal habitats of the site and occurs in association with extensive heath communities and upland grassland. Wet heath typically supports Cross-leaved Heath (*Erica tetralix*), Deergrass (*Trichophorum germanicum*), Purple Moor-grass (*Molinia caerulea*) and bog mosses, while drier slopes support Ling Heather (*Calluna vulgaris*), Bell Heather (*Erica cinerea*), Western Gorse (*Ulex gallii*) and a range of grasses and herbs. At higher elevations, alpine and boreal heath is developed, with characteristic montane vegetation adapted to severe exposure and shallow, nutrient-poor soils. Species-rich *Nardus* grassland also occurs in places, adding further botanical interest to the site and reflecting localised variation in soil conditions and grazing pressure.

In addition to its upland heaths and bogs, the site includes oligotrophic lakes and rocky habitats of high conservation value. The lakes support vegetation associated with nutrient-poor waters, while the cliffs and screes provide niches for specialised plant communities. Vegetated sea cliffs occur along parts of the coastal margin, and both calcareous and siliceous rocky slopes are represented within the site. Mount Brandon SAC is also important for Annex II species, including Freshwater Pearl Mussel (*Margaritifera margaritifera*) and Killarney Fern (*Vandenboschia speciosa*). Overall, the site is of major ecological importance because of its large extent, habitat diversity and the quality of its upland and coastal communities, many of which are listed on Annex I of the E.U. Habitats Directive.

3.1 Installation method

Prior to drilling commencing a temporary site boundary (approximately 20m x 20m) will be established and fenced off using heras fencing or similar. The drilling and installation activity will be conducted with GSI's drill rig (Figure 3-2**)**. The rig and all ancillary equipment and tools will be operated by GSI's experienced personnel. Additional plant and equipment required for the proposed works includes:

- GSI Vehicles (van or 4x4)
- Support Truck
- Water Pump
- Grout Plant



Figure 3-2 Boart Longyear LF90D Truck Mounted Drill Rig

Materials to be used during drilling and installation includes:

- Steel casing;
- Unplasticized polyvinyl chloride (uPVC) casing and screen;
- Sand;
- Cement;
- Bentonite pellets;
- Water (of potable quality).

All materials are inert.

All drilling will be undertaken with the rotary percussion method, which is the most common drilling method applied in Ireland for this type of installation. In the rotary percussion method, also referred to as the ‘down the hole hammer’ method, the drill bit at the end of drill rods is driven through subsoils and bedrock by compressed air. The diameter of the drill bit is 177.8 mm.

Drilling fluids or additives will not be used. Until the groundwater table is intercepted, the drilling process will produce *some* dust. In such temporary instances, water will be injected from the surface for dust suppression purposes.

There may be some discharge water and cuttings arising from the drilling process which in the absence of mitigation may be mobilised and reach Dingle Bay.

Upon mobilisation and set up, the sequence of drilling and installation activity for each borehole is outlined below.

Shallow Bedrock Borehole

- Conduct Symmetrix drilling with steel casing (254mm outer diameter, OD, and 200 mm inner diameter, ID), to a depth of approximately 1 m into competent bedrock;
- Install blank/solid unplasticized PVC (uPVC) casing (113.8mm OD and 103.8mm ID), fitted with a bottom plug/cap, to approximately 0.5 m above ground level;
- Grout the annulus outside the uPVC casing to ground level;
- Conduct 95mm Hyperbit drilling until first water strikes (<30m below ground level);
- Flush the resulting open borehole, using compressed air, to clean out fines;
- Remove the drill rods;
- Install a cover on the uPVC casing;
- Complete the ground surface finishing, including cement seal.

Deep Bedrock Borehole

- Conduct Symmetrix drilling with steel casing (254 mm OD and 200 mm ID) to a depth of approximately 1 m below the installed shallow bedrock borehole;
- Install blank/solid uPVC casing (113.8mm OD and 103.8mm ID), fitted with a bottom plug/cap, to approximately 0.5m above ground level;
- Grout the remaining annular space up to the ground level;
- Conduct 95mm Hyperbit system drilling until water strike (<60 m depth);
- Flush the resulting open borehole, using compressed air, to clean out fines;
- Remove the drill rods;
- Install a cover on the uPVC casing;
- Complete the ground surface finishing, including cement seal.

Precise drilled depths will be determined from observation and findings during the drilling process. In all cases, the first borehole will be drilled into bedrock and installed as a shallow bedrock monitoring borehole.

The borehole will be completed with a protective steel casing which will extend approximately 1.0 m above ground surface and will be surrounded by wooden bollards (Figure 3-3). Upon completion, site restoration works will be undertaken to bring the site back to pre-drilling conditions and make the boreholes as discrete features in the landscape.



Figure 3-3 Left: Example of Protective Steel Casing. Right: Example of wooden bollards.

The boreholes will be drilled and installed in accordance with the document ‘‘Guidelines for Drilling Boreholes for Private Water Supplies’, as published by the Institute of Geologists of Ireland (IGI, 2007), which aims to provide maximum safety to groundwater from potential contamination sources. The design includes a sanitary seal that serves to isolate the open, vertical section of each monitoring borehole from ground surface.

Upon completion, a data logger and modem will be installed in each monitoring borehole for automatic recording of water level, temperature and electrical conductivity, with real-time data transmission to a GSI server. Hence, manual readings are not necessary, although periodic visits (1-2 per year) will be required for equipment calibration and maintenance purposes.

The drilling and installation process is expected to take a maximum of 10 days.

4.0 Screening for Appropriate Assessment

4.1 Management of the European Site

The first aspect of screening is to establish whether or not the proposed project is directly connected with or necessary to the management of any site as a European site. In this case, the drilling of boreholes to monitor groundwater levels at Kilmore, Co. Kerry is being undertaken to record groundwater levels over time and will be incorporated in a strategic, national groundwater monitoring network operated by GSI. The data will also be used by NPWS to inform management of Mount Brandon SAC.

However, as the primary purpose of the borehole is not directly connected to the management of Mount Brandon SAC then it can be concluded that the **proposed project is not directly connected with or necessary to the management of any European site**. Therefore, Appropriate Assessment Screening is required to consider in view of best scientific knowledge and in view of the conservation objectives of those European sites considered, whether or not the project, individually or in combination with other plans or projects, is likely to have a significant effect on any European site.

4.2 Establishing an impact pathway

The likely significance of effects on any European site from drilling of boreholes at Kilmore was assessed using the source-pathway-receptor model. The 'source' is defined as the individual element of the proposed works that has the potential to impact on a European site, its qualifying features and its conservation objectives. The 'pathway' is defined as the means or route (proximity, hydrological/ hydrogeological, aerial, disturbance pathways) by which a source can affect the ecological receptor. The 'receptor' is defined as the Special Conservation Interests (of SPAs) or Qualifying Interests (of SACs) for which conservation objectives have been set for the European sites being screened. Each element can exist independently; however, an effect is created when there is a linkage between the source, pathway and receptor.

The selection of European sites for stage one screening follows guidance from the OPR (OPR, 2021), in addition to the NPWS 'Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities' (DEHLG, 2010a); this guidance recommends that the zone of influence for a proposed development is established on a case-by-case basis following the source-pathway-receptor framework, rather than by arbitrary distances (e.g. 15km), and that the precautionary principle should be adopted in the consideration of sites.

In considering a suitable zone of influence of this project, the possible pathways of impact have been considered. Given the works are located outside the boundary of Mount Brandon SAC within the boundary of a conifer plantation, there is no potential for direct loss

of any European Site habitat from the proposed activities. Therefore, direct habitat loss has been excluded from further assessment.

Hydrological impacts may extend downstream if there are changes to water quality from the proposed works. Given the location of the site at the coast such impacts are likely to be localised. Therefore, as a precautionary approach downstream sites within 10km have been considered in this assessment.

In addition, the drilling activities have the potential to lead to hydrogeological impacts, by lowering of the regional groundwater level if for example drilling were to impact on groundwater flow regimes or groundwater quality. Therefore, potential for hydrogeological impacts has been considered for groundwater-dependent European sites within 5km of the proposed installation location.

In addition, there is potential for disturbance impacts to bird species that use the site. Given the short-term duration of drilling activities and the localised nature of the drilling Special Protection Areas within 10km have therefore been considered at screening stage, since beyond this distance, Special Conservation Interests of these sites are likely to simply avoid the drilling site and immediate surroundings temporarily during the days of installation.

Given the potential impact pathways outlined above, 2 no. SACs and 2 no. SPAs are considered to occur within the maximum potential zone of influence of the proposed project. Details of these sites, including Qualifying Interests/Special Conservation Interests and distance from the study area are found in Table 4.1.

Each European site was individually reviewed to identify whether there were potential impact pathways evident from the proposed drilling activities. The assessment reviewed the potential for:

- Water quality effects arising from the proposed drilling activities that may affect downstream Annex I habitats, or Annex II species via habitat deterioration (10km downstream).
- Hydrogeological disturbance to groundwater-dependent habitats and species within European sites within 5km of the site.
- Disturbance or displacement effects on SCI bird species in the vicinity of the site (10km radius).

Table 4-1 Summary of European Sites and their qualifying features within the zone of influence of the proposed project

European Site (and distance from proposed drilling site)	Qualifying Features	Conservation Objectives	Impact Pathway
Mount Brandon SAC (000375) (0km)	Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]	To maintain the favourable conservation condition of Vegetated Sea cliffs of the Atlantic and Baltic coasts in Mount Brandon SAC, which is defined by a list of 8 attributes and targets.	No potential impact pathway between proposed drilling site and this habitat; therefore, this habitat has been excluded from further assessment.
	Oligotrophic waters containing very few minerals of sandy plains (*Littorelletalia uniflorae*) [3110]	To maintain the favourable conservation condition of Oligotrophic waters containing very few minerals of sandy plains (*Littorelletalia uniflorae*) in Mount Brandon SAC, which is defined by a list of 18 attributes and targets.	There is no hydrological connectivity between the proposed drilling site and this habitat; therefore, this habitat has been excluded from further assessment.
	Oligotrophic to mesotrophic standing waters with vegetation of the *Littorelletea uniflorae* and/or *Isoeto-Nanojuncetea* [3130]	To maintain the favourable conservation condition of Oligotrophic to mesotrophic standing waters with vegetation of the *Littorelletea uniflorae* and/or of the *Isoëto-Nanojuncetea* in Mount Brandon SAC, which is defined by a list of 18 attributes and targets.	There is no hydrological connectivity between the proposed drilling site and this habitat; therefore, this habitat has been excluded from further assessment.

European Site (and distance from proposed drilling site)	Qualifying Features	Conservation Objectives	Impact Pathway
	Northern Atlantic wet heaths with *Erica tetralix* [4010]	To restore the favourable conservation condition of Northern Atlantic wet heaths with *Erica tetralix* in Mount Brandon SAC, which is defined by a list of 20 attributes and targets.	Potential for hydrogeological impacts through changes to groundwater levels, flows or groundwater quality.
	European dry heaths [4030]	To restore the favourable conservation condition of European dry heaths in Mount Brandon SAC, which is defined by a list of 19 attributes and targets.	Potential for hydrogeological impacts through changes to groundwater levels, flows or groundwater quality.
	Alpine and Boreal heaths [4060]	To restore the favourable conservation condition of Alpine and Boreal heaths in Mount Brandon SAC, which is defined by a list of 14 attributes and targets.	Potential for hydrogeological impacts through changes to groundwater levels, flows or groundwater quality.
	Species-rich Nardus grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230]	To restore the favourable conservation condition of Species-rich Nardus grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe)* in Mount Brandon SAC, which is defined by a list of 18 attributes and targets.	No potential impact pathway between proposed drilling site and this habitat; therefore, this habitat has been excluded from further assessment.
	Blanket bogs (* if active bog) [7130]	To restore the favourable conservation condition of Blanket bogs in Mount Brandon SAC, which is defined by a list of 19 attributes and targets.	Potential for hydrogeological impacts through changes to groundwater levels, flows or groundwater quality.

European Site (and distance from proposed drilling site)	Qualifying Features	Conservation Objectives	Impact Pathway
	Siliceous scree of the montane to snow levels (*Androsacetalia alpinae* and *Galeopsietalia ladani*) [8110]	To restore the favourable conservation condition of Siliceous scree of the montane to snow levels (*Androsacetalia alpinae* and *Galeopsietalia ladani*) in Mount Brandon SAC, which is defined by a list of 12 attributes and targets.	No potential impact pathway between proposed drilling site and this habitat; therefore, this habitat has been excluded from further assessment.
	Calcareous rocky slopes with chasmophytic vegetation [8210]	To maintain the favourable conservation condition of Calcareous rocky slopes with chasmophytic vegetation in Mount Brandon SAC, which is defined by a list of 9 attributes and targets.	Potential for hydrogeological impacts through changes to groundwater levels, flows or groundwater quality.
	Siliceous rocky slopes with chasmophytic vegetation [8220]	To maintain the favourable conservation condition of Siliceous rocky slopes with chasmophytic vegetation in Mount Brandon SAC, which is defined by a list of 8 attributes and targets.	Potential for hydrogeological impacts through changes to groundwater levels, flows or groundwater quality.
	Freshwater Pearl Mussel (*Margaritifera margaritifera*) [1029]	To restore the favourable conservation condition of Freshwater Pearl Mussel in Mount Brandon SAC, which is defined by a list of 12 attributes and targets.	Potential for water quality impacts from runoff generated during drilling activities.

European Site (and distance from proposed drilling site)	Qualifying Features	Conservation Objectives	Impact Pathway
	Killarney Fern (*Vandenboschia speciosa*) [1421]	To maintain the favourable conservation condition of Killarney Fern in Mount Brandon SAC, which is defined by a list of 16 attributes and targets.	Potential for hydrogeological impacts through changes to groundwater levels, flows or groundwater quality.
Tralee Bay and Magharees Peninsula, West to Cloghane SAC (002070) (2.5km straight line distance, 3.0km hydrological distance)	Estuaries [1130]	To maintain the favourable conservation condition of Estuaries in Tralee Bay and Magharees Peninsula, West to Cloghane SAC, which is defined by a list of 5 attributes and targets.	There is no hydrological connectivity between the proposed drilling site and this habitat (within 10km); therefore, this habitat has been excluded from further assessment.
	Mudflats and sandflats not covered by seawater at low tide [1140]	To maintain the favourable conservation condition of Mudflats and sandflats not covered by seawater at low tide in Tralee Bay and Magharees Peninsula, West to Cloghane SAC, which is defined by a list of 6 attributes and targets.	Potential for water quality impacts from runoff generated during drilling activities.
	Coastal lagoons [1150]	To restore the favourable conservation condition of Coastal lagoons in Tralee Bay and Magharees Peninsula, West to Cloghane SAC, which is defined by a list of 12 attributes and targets.	There is no hydrological connectivity between the proposed drilling site and this habitat (within 10km); therefore, this habitat has been excluded from further assessment.

European Site (and distance from proposed drilling site)	Qualifying Features	Conservation Objectives	Impact Pathway
	Large shallow inlets and bays [1160]	To maintain the favourable conservation condition of Large shallow inlets and bays in Tralee Bay and Magharees Peninsula, West to Cloghane SAC, which is defined by a list of 6 attributes and targets.	Potential for water quality impacts from runoff generated during drilling activities.
	Reefs [1170]	To maintain the favourable conservation condition of Reefs in Tralee Bay and Magharees Peninsula, West to Cloghane SAC, which is defined by a list of 6 attributes and targets.	Potential for water quality impacts from runoff generated during drilling activities.
	Annual vegetation of drift lines [1210]	To restore the favourable conservation condition of Annual vegetation of drift lines in Tralee Bay and Magharees Peninsula, West to Cloghane SAC, which is defined by a list of 6 attributes and targets.	No potential impact pathway between proposed drilling site and this habitat; therefore, this habitat has been excluded from further assessment.
	Perennial vegetation of stony banks [1220]	To maintain the favourable conservation condition of Perennial vegetation of stony banks in Tralee Bay and Magharees Peninsula, West to Cloghane SAC, which is defined by a list of 6 attributes and targets.	No potential impact pathway between proposed drilling site and this habitat; therefore, this habitat has been excluded from further assessment.

European Site (and distance from proposed drilling site)	Qualifying Features	Conservation Objectives	Impact Pathway
	Salicornia and other annuals colonising mud and sand [1310]	To maintain the favourable conservation condition of Salicornia and other annuals colonizing mud and sand in Tralee Bay and Magharees Peninsula, West to Cloghane SAC, which is defined by a list of 10 attributes and targets.	Potential for water quality impacts from runoff generated during drilling activities.
	Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) [1330]	To maintain the favourable conservation condition of Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) in Tralee Bay and Magharees Peninsula, West to Cloghane SAC, which is defined by a list of 10 attributes and targets.	Potential for water quality impacts from runoff generated during drilling activities.
	Mediterranean salt meadows (*Juncetalia maritimi*) [1410]	• To maintain the favourable conservation condition of Mediterranean salt meadows (*Juncetalia maritimi*) in Tralee Bay and Magharees Peninsula, West to Cloghane SAC, which is defined by a list of 10 attributes and targets.	There is no hydrological connectivity between the proposed drilling site and this habitat (within 10km); therefore, this habitat has been excluded from further assessment.
	Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes) [2120]	To restore the favourable conservation condition of Shifting dunes along the shoreline with *Ammophila arenaria* ('white dunes') in Tralee Bay and	No potential impact pathway between proposed drilling site and this habitat; therefore, this

European Site (and distance from proposed drilling site)	Qualifying Features	Conservation Objectives	Impact Pathway
		Magharees Peninsula, West to Cloghane SAC, which is defined by a list of 7 attributes and targets.	habitat has been excluded from further assessment.
	Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]	To restore the favourable conservation condition of Fixed coastal dunes with herbaceous vegetation ('grey dunes') in Tralee Bay and Magharees Peninsula, West to Cloghane SAC, which is defined by a list of 9 attributes and targets.	No potential impact pathway between proposed drilling site and this habitat; therefore, this habitat has been excluded from further assessment.
	Dunes with *Salix repens* ssp. *argentea* (*Salicion arenariae*) [2170]	To maintain the favourable conservation condition of Dunes with *Salix repens* ssp. *argentea* (*Salicion arenariae*) in Tralee Bay and Magharees Peninsula, West to Cloghane SAC, which is defined by a list of 10 attributes and targets.	No potential impact pathway between proposed drilling site and this habitat; therefore, this habitat has been excluded from further assessment.
	Humid dune slacks [2190]	To restore the favourable conservation condition of Humid dune slacks in Tralee Bay and Magharees Peninsula, West to Cloghane SAC, which is defined by a list of 11 attributes and targets.	No potential impact pathway between proposed drilling site and this habitat; therefore, this habitat has been excluded from further assessment.

European Site (and distance from proposed drilling site)	Qualifying Features	Conservation Objectives	Impact Pathway
	Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) [6410]	To maintain the favourable conservation condition of *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*) in Tralee Bay and Magharees Peninsula, West to Cloghane SAC, which is defined by a list of 10 attributes and targets.	No potential impact pathway between proposed drilling site and this habitat; therefore, this habitat has been excluded from further assessment.
	Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (Alno-Padion, Alnion incanae, Salicion albae) [91E0]	To restore the favourable conservation condition of Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*) in Tralee Bay and Magharees Peninsula, West to Cloghane SAC, which is defined by a list of 13 attributes and targets	No potential impact pathway between proposed drilling site and this habitat; therefore, this habitat has been excluded from further assessment.
	Otter (*Lutra lutra*) [1355]	To restore the favourable conservation condition of Otter in Tralee Bay and Magharees Peninsula, West to Cloghane SAC, which is defined by a list of 8 attributes and targets.	Given the distance between the proposed drilling site, the location of the SAC and suitable otter habitat and the distance from any watercourses the risk of direct mortality or disturbance can be ruled out. Potential for water quality impacts on, if pollution were to

European Site (and distance from proposed drilling site)	Qualifying Features	Conservation Objectives	Impact Pathway
			impact on this species' food source.
	Petalwort (*Petalophyllum ralfsii*) [1395]	To restore the favourable conservation condition of Petalwort in Tralee Bay and Magharees Peninsula, West to Cloghane SAC, which is defined by a list of 5 attributes and targets.	No potential impact pathway between proposed drilling site and this habitat; therefore, this habitat has been excluded from further assessment.
Tralee Bay Complex SPA (004188) (8.8km)	Whooper Swan (*Cygnus cygnus*) [A038]	To maintain the favourable conservation condition of Whooper Swan in Tralee Bay Complex SPA, which is defined by a list of 2 attributes and targets.	Potential for noise disturbance during drilling activities.
	Brent Goose (*Branta bernicla hrota*) [A046]	To maintain the favourable conservation condition of Light-bellied Brent Goose in Tralee Bay Complex SPA, which is defined by a list of 2 attributes and targets.	Potential for noise disturbance during drilling activities.
	Shelduck (*Tadorna tadorna*) [A048]	To maintain the favourable conservation condition of Shelduck in Tralee Bay Complex SPA, which is defined by a list of 2 attributes and targets.	Potential for noise disturbance during drilling activities.
	Wigeon (*Anas penelope*) [A050]	To maintain the favourable conservation condition of Wigeon in Tralee Bay Complex SPA, which is defined by a list of 2 attributes and targets.	Potential for noise disturbance during drilling activities.

European Site (and distance from proposed drilling site)	Qualifying Features	Conservation Objectives	Impact Pathway
	Teal (*Anas crecca*) [A052]	To maintain the favourable conservation condition of Teal in Tralee Bay Complex SPA, which is defined by a list of 2 attributes and targets.	Potential for noise disturbance during drilling activities.
	Mallard (*Anas platyrhynchos*) [A053]	To maintain the favourable conservation condition of Mallard in Tralee Bay Complex SPA, which is defined by a list of 2 attributes and targets.	Potential for noise disturbance during drilling activities.
	Pintail (*Anas acuta*) [A054]	To maintain the favourable conservation condition of Pintail in Tralee Bay Complex SPA, which is defined by a list of 2 attributes and targets.	Potential for noise disturbance during drilling activities.
	Scaup (*Aythya marila*) [A062]	To maintain the favourable conservation condition of Scaup in Tralee Bay Complex SPA, which is defined by a list of 2 attributes and targets.	Potential for noise disturbance during drilling activities.
	Oystercatcher (*Haematopus ostralegus*) [A130]	To maintain the favourable conservation condition of Oystercatcher in Tralee Bay Complex SPA, which is defined by a list of 2 attributes and targets.	Potential for noise disturbance during drilling activities.
	Ringed Plover (*Charadrius hiaticula*) [A137]	To maintain the favourable conservation condition of Ringed Plover in Tralee Bay Complex SPA, which is defined by a list of 2 attributes and targets.	Potential for noise disturbance during drilling activities.

European Site (and distance from proposed drilling site)	Qualifying Features	Conservation Objectives	Impact Pathway
	Golden Plover (*Pluvialis apricaria*) [A140]	To maintain the favourable conservation condition of Golden Plover in Tralee Bay Complex SPA, which is defined by a list of 2 attributes and targets.	Potential for noise disturbance during drilling activities.
	Grey Plover (*Pluvialis squatarola*) [A141]	To maintain/restore the favourable conservation condition of Grey Plover in Tralee Bay Complex SPA, which is defined by a list of 2 attributes and targets.	Potential for noise disturbance during drilling activities.
	Lapwing (*Vanellus vanellus*) [A142]	To maintain the favourable conservation condition of Lapwing in Tralee Bay Complex SPA, which is defined by a list of 2 attributes and targets.	Potential for noise disturbance during drilling activities.
	Sanderling (*Calidris alba*) [A144]	To maintain the favourable conservation condition of Sanderling in Tralee Bay Complex SPA, which is defined by a list of 2 attributes and targets.	Potential for noise disturbance during drilling activities.
	Dunlin (*Calidris alpina alpina*) [A149]	To maintain the favourable conservation condition of Dunlin in Tralee Bay Complex SPA, which is defined by a list of 2 attributes and targets.	Potential for noise disturbance during drilling activities.
	Black-tailed Godwit (*Limosa limosa*) [A156]	To maintain the favourable conservation condition of Black-tailed	Potential for noise disturbance during drilling activities.

European Site (and distance from proposed drilling site)	Qualifying Features	Conservation Objectives	Impact Pathway
		Godwit in Tralee Bay Complex SPA, which is defined by a list of 2 attributes and targets.	
	Bar-tailed Godwit (*Limosa lapponica*) [A157]	To maintain the favourable conservation condition of Bar-tailed Godwit in Tralee Bay Complex SPA, which is defined by a list of 2 attributes and targets.	Potential for noise disturbance during drilling activities.
	Curlew (*Numenius arquata*) [A160]	To maintain the favourable conservation condition of Curlew in Tralee Bay Complex SPA, which is defined by a list of 2 attributes and targets.	Potential for noise disturbance during drilling activities.
	Redshank (*Tringa tetanus*) [A162]	To maintain the favourable conservation condition of Redshank in Tralee Bay Complex SPA, which is defined by a list of 2 attributes and targets.	Potential for noise disturbance during drilling activities.
	Turnstone (*Arenaria interpres*) [A169]	To maintain the favourable conservation condition of Turnstone in Tralee Bay Complex SPA, which is defined by a list of 2 attributes and targets.	Potential for noise disturbance during drilling activities.
	Black-headed Gull (*Chroicocephalus ridibundus*) [A179]	To maintain the favourable conservation condition of Black-headed Gull in Tralee Bay Complex SPA,	Potential for noise disturbance during drilling activities.

European Site (and distance from proposed drilling site)	Qualifying Features	Conservation Objectives	Impact Pathway
		which is defined by a list of 2 attributes and targets.	
	Common Gull (*Larus canus*) [A182]	To maintain the favourable conservation condition of Common Gull in Tralee Bay Complex SPA, which is defined by a list of 2 attributes and targets.	Potential for noise disturbance during drilling activities
	Wetlands and Waterbirds [A999]	To maintain the favourable conservation condition of the wetland habitat in Tralee Bay Complex SPA as a resource for the regularly occurring migratory waterbirds that utilise it. This is defined by 1 attribute and target.	No potential impact pathway between proposed drilling site and the wetland habitat of the SPA; therefore, this habitat has been excluded from further assessment.
Dingle Peninsula SPA (004153) (2.4 km)	Fulmar (*Fulmarus glacialis*) [A009]	To restore the favourable conservation condition of Fulmar in Dingle Peninsula SPA, which is defined by a list of 7 attributes and targets.	Potential for noise disturbance during drilling activities.
	Peregrine (*Falco peregrinus*) [A103]	To maintain the favourable conservation condition of Peregrine in Dingle Peninsula SPA, which is defined by a list of 5 attributes and targets.	Potential for noise disturbance during drilling activities.
	Chough (*Pyrrhocorax pyrrhocorax*) [A346]	To restore the favourable conservation condition of Chough in Dingle	Potential for noise disturbance during drilling activities.

European Site (and distance from proposed drilling site)	Qualifying Features	Conservation Objectives	Impact Pathway
		Peninsula SPA, which is defined by a list of 9 attributes and targets.	

5.0 Screening impacts on European Sites

5.1 Potential for direct mortality

There is a risk of direct mortality of mobile species such as SCI species for Tralee Bay Complex SPA and Dingle Peninsula SPA. However, given the limited number of traffic movements required over a relatively short duration (maximum 10 days of drilling activity), the lack of wetland habitat in the vicinity of the drilling site and the distance from the nearest area of the SPA and the ability of any SCI species to move away from the proposed drilling site, the risk of direct mortality is extremely low and not considered to be above a *de minimis* threshold. Therefore, the risk of likely significant effects through direct mortality can be ruled out.

5.2 Potential for hydrogeological disturbance on European Sites

Preliminary assessment identified several groundwater-dependent habitats that could be impacted by significant changes to groundwater quality and quantity. Several groundwater-dependent habitats and one groundwater-dependent species within Mount Brandon SAC have been identified including several peatland habitats. However, the proposed drilling is into the Coumeenoole Sandstone Formation which is a Locally Important Aquifer (Bedrock which is Moderately Productive only in Local Zones). Therefore, the risk of drilling activities leading to a significant change in hydrogeological regime is extremely low.

In addition, the proposed works comprise the installation of monitoring boreholes only and do not involve groundwater abstraction or any ongoing discharge that could alter groundwater levels or gradients. The borehole design includes steel and uPVC casing, grouting of the annular space to ground level and a sanitary seal, which will isolate the boreholes from shallow ground conditions and minimise the potential for vertical cross-connection between water-bearing horizons or the creation of a preferential drainage pathway. The drilling footprint is very small, the drilling activity is temporary, and the completed installations are intended only to record groundwater conditions rather than modify them. On that basis, and having regard to the local bedrock aquifer characteristics, the proposed project is not expected to result in any ecologically significant change to the groundwater regime (quantity or quality) supporting groundwater-dependent habitats within Mount Brandon SAC.

Therefore, it can be concluded that the risk of likely significant effects to groundwater-dependent habitats within Mount Brandon SAC can also be excluded.

5.3 Potential for water quality impacts on European Sites

Drilling of boreholes may generate contaminated runoff from the temporary drilling area, particularly during rainfall, where contaminants including sediment, drill cuttings, or small

quantities of fuel or oil could be mobilised. In the absence of mitigation measures, this runoff could potentially enter surrounding surface waters and cause a short-term decline in water quality. The proposed drilling site is located within the Owenmore (Kerry)_010 sub-basin which forms part of the Owenmore[Kerry]_SC_010 sub-catchment. The Owenmore (Kerry)_010 sub-basin drains into the Brandon Bay coastal waterbody. The Owenmore (Kerry)_010 sub-basin was assigned moderate status in the latest monitoring cycle by the EPA (2019-2024) due to biological monitoring (Q Value) recorded in one of the tributaries of the river. However, the monitoring stations downstream of the proposed drilling site had a Q Value of 4 in the most recent assessment in 2023. Brandon Bay was assigned high status in the latest monitoring assessment.

It is acknowledged that in the absence of mitigation measures (specifically creation of bunded area for any runoff or drill washings) there is a potential for pollutants, namely sediment, drill cuttings, fuels and lubricants to be mobilised and enter the Owenmore (Kerry)_010 sub-basin and eventually enter Brandon Bay. Impacts to water quality could impact on freshwater pearl mussel which is a qualifying feature of Mount Brandon SAC and extremely sensitive to changes in water quality or flow regime. The area of suitable freshwater pearl mussel habitat is located c. 1.1 km downstream of the proposed drilling site. Furthermore, downstream habitats and species within Tralee Bay and Magharees Peninsula, West to Cloghane SAC could be impacted by significant changes in water quality (mudflats and sandflats not covered by seawater at low tide, large shallow inlets and bays, Salicornia and other annuals colonising mud and sand, Atlantic salt meadows and Otter).

It is anticipated that any runoff would be extremely limited, small in volume and short in duration, and would likely be contained to within the boundary of the drilling area. There are no mapped watercourses within 1.1km of the downstream river, meaning the area does not have strong hydrological connectivity with the river (although it is likely that there are drainage pathways within the adjacent forestry that lead to the Owenmore [Kerry] river channel). Nevertheless, given the extremely localised nature of the works, the limited hydrological connectivity of the site to the downstream freshwater pearl mussel population and the short-term duration of the proposed drilling works, the works will not lead to any likely significant effects on freshwater pearl mussel and this species can be excluded from further assessment.

The dilution potential of Brandon Bay means any water quality impacts will be imperceptible and can be considered below a *de minimis* threshold for any other downstream habitats. Therefore, potential for water quality impacts to lead to a likely significant effect on any qualifying feature of Tralee Bay and Magharees Peninsula, West to Cloghane SAC can be excluded from further assessment.

5.4 Potential for disturbance of SCI species

It is possible that the proposed drilling activities could lead to short-term disturbance to Special Conservation Interests of both Tralee Bay SPA and Dingle Peninsula SPA.

However, given the limited spatial extent of the proposed works (20m x 20m) relative to the broader area around the SPA, and short duration of the works (maximum 10 days of drilling activities), the risk of causing disturbance that would lead to likely significant effects on any of the SCI species of either SPA is considered extremely unlikely.

The drilling site itself does not comprise significant wetland habitat used by the SCI waterbird assemblage of Tralee Bay Complex SPA, nor is it located within any known core roosting or foraging area for those species; therefore, the risk of significant disturbance to any SCI species is extremely low. Similarly, the drilling site is not located within cliff or coastal habitat used by the SCI species of Dingle Peninsula SPA; therefore, the risk of significant disturbance to any SCI species is extremely low.

5.5 In-combination with other plans and projects

Article 6(3) of the Habitats Directive requires that in-combination effects with other plans or projects are also considered. As set out in the Commission's 2018 Notice (EC, 2019), significance will vary depending on factors such as magnitude of impact, type, extent, duration, intensity, timing, probability, cumulative effects and the vulnerability of the habitats and species concerned. The significance of any identified combined effects of the proposed development and other past, present or reasonably foreseeable future plans or projects must be evaluated.

In that context, plans or projects which are completed, approved but uncompleted, or proposed have been considered. EC (2019) specifically advises that "as regards other proposed plans or projects, on grounds of legal certainty it would seem appropriate to restrict the in-combination provision to those which have been actually proposed, i.e., for which an application for approval or consent has been introduced". On the basis of advice contained in EC (2019) and OPR (2021), relevant County Development Plans (CDPs) / Local Area Plans (LAPs) were considered in terms of their potential to have in-combination effects with the proposed project.

The Kerry County Development Plan (CDP) 2022-2028 was considered. This Plan was reviewed and considered in terms of its potential to result in in-combination effects likely to have a significant effect on any European site. The Natura Impact Report considered the potential for impacts of the CDP on European sites. It concluded that, having incorporated mitigation measures, the CDP would not adversely affect the integrity of any of the European sites considered. Given the localised nature of the drilling activities, together with the strategic nature of the CDP, there is not considered to be any potential for in-combination effects with this plan. It is more likely that in-combination effects would occur at the project scale which has been considered further below.

A planning search was undertaken on the Kerry County Council website for local projects approved or pending that could potentially give rise to in-combination effects. There are no recent planning applications in close proximity to the proposed drilling site at Kilmore. There are several applications for new agricultural buildings or upgrades to existing agricultural

buildings and historical applications for dwellings, although none of these applications are located within the immediate vicinity of the project site. Given the small scale of many of these developments and spatial separation of these projects there is not considered to be any potential for in-combination effects from these developments.

The Department for Agriculture, Food and the Marine forestry viewer was examined to identify whether there are any planning felling works or forestry operations in the vicinity of the drilling site planned. However, no license applications for felling or other forestry operations within the area were identified with the nearest application from 2021 for a short section of forestry road located several kilometres away from the proposed drilling site.

The planning search and forestry licence review were undertaken in May 2026 and did not identify any nearby projects of a type, scale or location capable of acting in combination with the proposed drilling works.

It is considered that no other plans or projects lie within proximity to the proposed works or have potential to give rise to significant in-combination effects with the proposed project.

6.0 Appropriate Assessment Screening Conclusion

This Appropriate Assessment Screening Report was completed in compliance with EU and Irish law and the relevant European Commission and national guidelines as set out at Section 2 of this report, and on the proposed project as described at Section 3 of this report, to determine whether or not Likely Significant Effects on any European site could be excluded as a result of the proposed project.

The potential impacts of the proposed project have been considered in the context of the European Sites identified in Section 4, their Qualifying Interests and Special Conservation Interests and any Conservation Objectives which have been set.

From the findings of the Screening exercise, it is concluded that the proposed project **is not directly connected with or necessary to the management of any European site**.

Therefore, an Appropriate Assessment Screening was prepared to identify the potential for likely significant effects on the qualifying features of any European Sites.

In summary, the findings of this screening exercise determined that drilling activities and ongoing monitoring will not give rise to potential significant effects on the Qualifying Interests or Special Conservation Interests of any European site.

Having regard to the methodology employed and the findings of this screening exercise, it has been concluded that Stage 2 Appropriate Assessment is not required in accordance with Section 42(7) of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended).

7.0 References

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