



Water Framework Directive Compliance Assessment

**Proposed Large Residential Development (LRD) at
Killowen, Kenmare, Co. Kerry**

KPH Construction

September 2026

Contents

1.	Introduction	1
1.1	Competency of Assessor and Reviewer	1
2.	Legislative Context	2
2.1	Water Framework Directive (WFD) (2000/60/EC)	2
2.2	WFD Objectives	2
2.3	WFD Classifications	2
2.3.1	Ecological Status	3
2.3.2	Physico-Chemical Quality Status	5
2.3.3	Hydro-Morphological Status	5
2.4	WFD Protected Areas	5
3.	Assessment Methodology	7
3.1	Appraisal Method	7
3.2	Data Resources	7
4.	Proposed Development	8
4.1	Characteristics of the Proposed Development	10
4.2	Drainage	10
4.2.1	Storm water	10
4.2.2	Foul Water	11
4.3	Temporary Construction Compound	11
4.4	Construction Procedures	11
4.5	Waste Management	11
4.6	Controls and Monitoring Works	12
4.7	Flood Risk	12
5.	Receiving Environment	14
5.1	Catchment Description	14
5.2	Relevant Surface Water Body and Status	16
5.2.1	WFD River Sub Basin	16
5.2.2	WFD River Waterbodies	16
5.2.3	Water Quality and Waterbodies Risk Status	17
5.3	Relevant Groundwater Body and Status	19
5.3.1	WFD Groundwater Body	19
5.3.2	Groundwater Quality and Risk Status	21

5.4	Drinking Water/Abstractions	22
5.5	Bathing Waters	23
5.6	Nutrient Sensitive Areas	23
5.7	Protected Sites	25
5.7.1	Natura 2000 Sites	25
5.7.2	Nationally Designated Conservation Sites	26
6.	Compliance Assessment	28
6.1	Stage One: Screening	28
6.2	Stage Two: Scoping	33
6.3	Stage Three: Impact Assessment	39
7.	Conclusion	44
8.	WFD Compliance Summary Statement	44
	References	46

Tables

Table 2-1: Biological Assessment Methods used to assess Ecological Status	4
Table 2-2: Physico-Chemical Quality Elements and Parameters of Water	5
Table 5-1: Surface Waterbody Status	18
Table 5-2: Groundwater Status	21
Table 6-1: Project Phases and Activities	28
Table 6-2: Results of Screening Exercise	29
Table 6-3: Results of Scoping Exercise	34
Table 6-4: Impact Assessment Exercise	40

Figures

Figure 2-1: WFD Classification (Catchments.ie, 2022)	3
Figure 4-1: Proposed Development site in the context of the wider Kenmare area	9
Figure 4-2: Proposed Development site on the aerial photograph	9
Figure 5-1: Dunmanus-Bantry-Kenmare Catchment	15
Figure 5-2: Finnihy_SC_010 Water Framework Directive (WFD) Sub-Catchment	15
Figure 5-3: River Sub Basin	16
Figure 5-4: Surface Waterbodies	17

Figure 5-5: Water Quality Monitoring Value 18

Figure 5-6: Groundwater Vulnerability 20

Figure 5-7: Groundwater Aquifer Classification 21

Figure 5-8: Groundwater Body Risk 22

Figure 5-9: Nutrient Sensitive Areas 24

Figure 5-10: Designated Shellfish Areas and Aquaculture Sites 25

Figure 5-11: European sites located within the potential ZOI of the Proposed Development..... 26

Figure 5-12: Nationally Designated Conservation Sites 27

Project No.	Doc. No.	Rev.	Date	Prepared By	Checked By	Approved By	Acceptance Code / Status
25631	6006	0	04/09/2026	SoD	OH	OH	S-P3

MWP, Engineering and Environmental Consultants
Address: Reen Point, Blennerville, Tralee, Co. Kerry, V92 X2TK, Ireland
www.mwp.ie



Disclaimer: This Report, and the information contained in this Report, is Private and Confidential and is intended solely for the use of the individual or entity to which it is addressed (the “Recipient”). The Report is provided strictly on the basis of the terms and conditions contained within the Appointment between MWP and the Recipient. If you are not the Recipient you must not disclose, distribute, copy, print or rely on this Report (unless in accordance with a submission to the planning authority). MWP have prepared this Report for the Recipient using all the reasonable skill and care to be expected of an Engineering and Environmental Consultancy and MWP do not accept any responsibility or liability whatsoever for the use of this Report by any party for any purpose other than that for which the Report has been prepared and provided to the Recipient.

1. Introduction

Malachy Walsh and Partners (MWP) have been commissioned by KPH Construction to undertake a Water Framework Directive (WFD) Compliance Assessment in respect of a Proposed Residential Development ('The Proposed Development') at Killowen, Kenmare, Co. Kerry.

In accordance with the WFD, proposals that have the potential to impact 'waterbodies' as designated by the WFD are required to demonstrate that any actions would not cause a deterioration of the current status of any water body, and that the Proposed Development does not prevent the achievement of the future status environmental objectives of any water body. The WFD considers both the environmental status of surface water and groundwater.

This report considers waterbodies within the proximity of the Proposed Development that have the potential to be impacted on by the Proposed Development.

The purpose of this WFD Compliance Assessment report is to assist developers and regulators to understand the impact that the Proposed Development may have on the immediate water body and any linked waterbodies and to ensure that the Proposed Development will not prevent compliance with the WFD Objectives.

1.1 Competency of Assessor and Reviewer

This assessment was undertaken by Serena O'Donnell. This assessment was reviewed by Olivia Holmes.

Serena has a BA Honours (Geography) and MSc. Applied Environmental Geoscience and is a graduate Environmental Scientist at MWP. Serena has experience in environmental consultancy since 2024, and in this time has worked on a variety of environmental projects assisting with the preparation of EIAR chapters, including lands and soils, Environmental Impact Reports, Water Framework Directives, Geotechnical Interpretative Reports, Geotechnical Assessment Reports, Construction and Environmental Management Plans (CEMPs) and Resource Waste Management Plans (RWMPs).

Olivia is a Chartered Environmental Consultant and a Chartered Engineer with over twenty five years' experience in the project management and delivery of multi-disciplinary infrastructure engineering projects. With a strong understanding and appreciation for both the engineering and environmental aspects of projects, she has particular expertise in providing strategic advice to clients on statutory consenting and Environmental Impact Assessment and brownfield development and waste management.

2. Legislative Context

2.1 Water Framework Directive (WFD) (2000/60/EC)

The EU Water Framework Directive (2000/60/EC), as amended by Directives 2008/32/EC, 2008/105/EC, 2009/31/EC, 2013/39/EU, 2013/64/EU and 2014/101/EU ('WFD'), was established to ensure the protection of the water environment. The WFD requires that all member states protect and improve water quality in all waters, with the aim of achieving good status by 2027 at the latest. Any new development must ensure that this fundamental requirement of the WFD is not compromised.

The Directive was transposed in Ireland by the European Communities (Water Policy) Regulations 2003 (S.I. No. 722 of 2003) as amended. The Regulations provide for the implementation of the WFD in Ireland, providing the designation of all waters (rivers, lakes, estuarine waters, transitional coastal waters and groundwaters) as 'waterbodies' and setting objectives for the achievement of Good Ecological Status (GES) or Good Ecological Potential (GEP) and Good Chemical Status (GCS). European Communities Environmental Objectives (Surface Waters) Regulations 2009 (S.I. No. 272/2009), as amended and the European Communities Environmental Objectives (Groundwater) Regulations 2010 (S.I. No. 9/2010) as amended give further effect to the WFD in Ireland.

2.2 WFD Objectives

There are two principal objectives of the WFD:

- The first objective requires that all waterbodies must reach at least 'good' overall status by 2027, at the latest. For surface waters, good status is a combination of good ecological status (or potential) and good chemical status; and
- The second objective requires that the status of each water body, including all the quality elements which make up overall status, must not deteriorate relative to the baseline reported in the relevant River Basin Management Plan (RBMP).

The WFD is implemented through the River Basin Management Plans (RBMP) which comprises a six-yearly cycle of planning, action and review. RBMPs include identifying river basin districts, waterbodies, protected areas and any pressures or risks, monitoring and setting environmental objectives. In Ireland, the first RBMP covered the period from 2010 to 2015 with the second cycle plan covering the period from 2018 to 2021 and the third cycle from 2022 to 2027. The River Basin Management Plan 2022-2027, programme of measures to protect and restore our waters was published in September 2024.

The plan sets out key actions required to effectively implement mitigation measures to significantly improve water quality and identify where these measures should be deployed. In addition, the potential impacts of climate change on water resources, the planning for droughts and water scarcity is increasingly crucial.

2.3 WFD Classifications

The information used in the classification of the status of our waterbodies is collected in the national WFD monitoring programme. Information on a range of different elements is provided at <https://gis.epa.ie/EPAMaps/Water>:

- Biology (plants and animals living in and around waterbodies);

- Water quality (concentrations of nutrients such as nitrogen and phosphorus and harmful chemicals such as pesticides);
- Water quantity (flows and levels of surface waters and groundwaters); and
- Hydromorphology (the physical habitat conditions of waterbodies).

Rivers, lakes, estuaries and coastal waters can be awarded one of five statuses and groundwater two statuses (Figure 2-1).

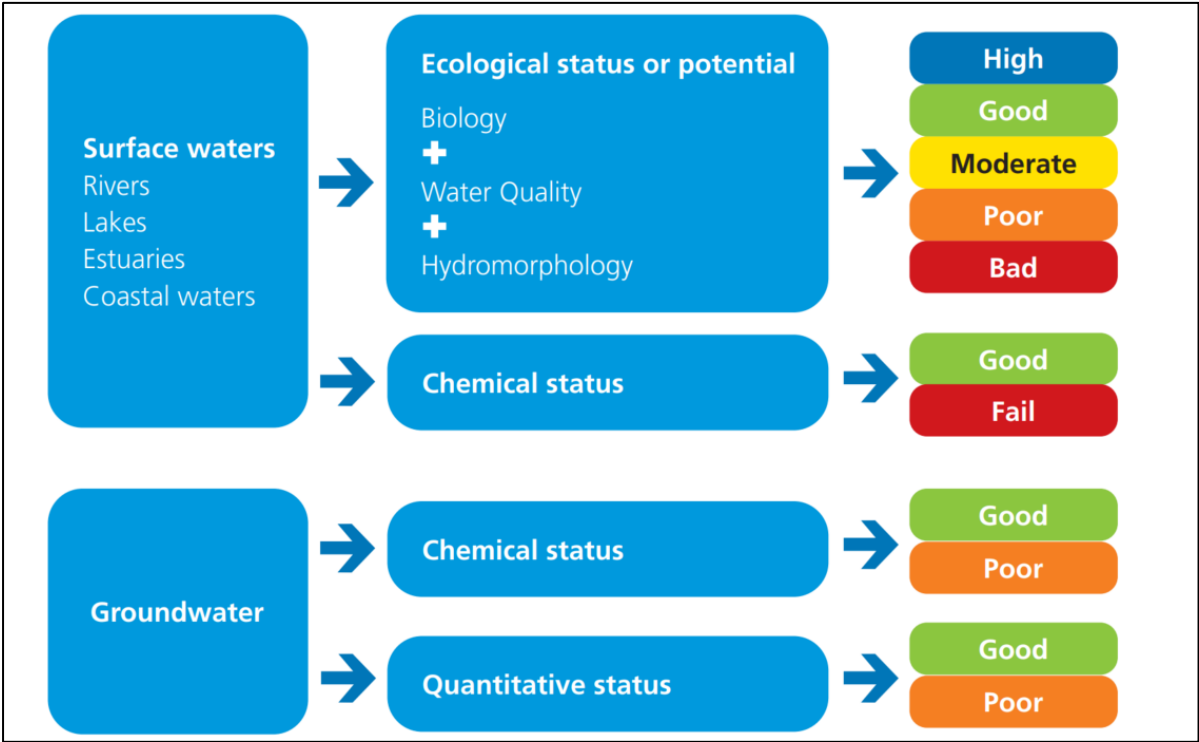


Figure 2-1: WFD Classification (Catchments.ie, 2022)

Overall, status is a composite measure that looks at both ecological status and chemical status. It considers all four assessment types under ecological status (biology, physico-chemical, Annex VIII substances and hydromorphology) as well as incorporating the results of the chemical status assessment. The one-out-all-out rule is applied again here, so a water body must be good or better ecological status, and good (pass) chemical status assessment to be given a good overall status.

2.3.1 Ecological Status

Ecological status is recorded as high, good, moderate, poor or bad. ‘High’ represents ‘largely undisturbed conditions’. Eighteen different biological assessment methods have been developed to assess the condition of biological communities across the four surface water categories (EPA, Ireland’s National Water Quality Monitoring Programme 2022-2027). Refer to Table 2-1.

Table 2-1: Biological Assessment Methods used to assess Ecological Status

Quality Element	Rivers	Lakes	Transitional Waters	Coastal Waters
Macroinvertebrates	Quality Rating System (Q-value)	Lake Acidification Macroinvertebrate Metric (LAMM)	Infraunal Quality Index (IQI)	Infraunal Quality Index (IQI)
	Acid Water Indicator Community Score (AWICs)			
Aquatic Plants	Mean Trophic Rank (MTR)	Free Macrophyte Index	Intertidal Seagrass tool	Intertidal Seagrass tool
	LEAFPACS		Saltmarsh Angiosperm Assessment Tool for Ireland (SMAATIE)	Saltmarsh Angiosperm Assessment Tool for Ireland (SMAATIE)
Macroalgae	Mean Trophic Rank (MTR)	Not applicable	Opportunistic Green Macroalgal Abundance (OGA tool)	Opportunistic Green Macroalgal Abundance (OGA tool)
	LEAFPACS			RSL – Rocky Shore reduced species list
Phytoplankton	Not applicable	IE Lake Phytoplankton Index	Phytoplankton biomass & composition	Phytoplankton biomass & composition
Phytobenthos	Revised form of Trophic Diatom Index (TDI)	Lake Trophic Diatom Index (IE)	Not applicable	Not applicable
Fish	Fish Classification Scheme (FCS2)	Fish in lakes 2 (FIL2)	Transitional Fish Classification Index (TFCI)	Not applicable
			Estuarine Multi-metric Fish Index (EMFI)	

2.3.2 Physico-Chemical Quality Status

Physico-chemical elements such as nutrients, dissolved oxygen, salinity, pH, etc., are measured to provide an indication of how these elements support the achievement of good or better ecological status. The physico-chemical quality elements and parameters that will be monitored in the 2022-2027 programme are shown in **Table 2-2**. Transparency in rivers is not measured due to the shallow nature of most Irish rivers.

Table 2-2: Physico-Chemical Quality Elements and Parameters of Water

Quality Element	Rivers	Lakes	Transitional Waters	Coastal Waters
Transparency	Not measured	Secchi depth, colour	Secchi Depth	Secchi Depth
Thermal Conditions	Temperature	Temperature	Temperature	Temperature
Oxygenation conditions	DO, BOD	DO	DO, BOD	DO, BOD
Acidification	pH, alkalinity, cations and anions, DOC	pH, alkalinity, cations and anions, DOC	pH	pH
Salinity	Conductivity	Conductivity	Salinity	Salinity
Nutrient Conditions	MRP, TA, TON	MRP, TA, TON, TP, Si	DIN, MRP, Si	DIN, MRP, Si

2.3.3 Hydro-Morphological Status

The WFD requires the assessment of the ecological status, which includes hydro-morphological quality elements. Hydro-morphology is the study of physical form, condition and processes within a surface water body, which create and maintain habitat. Where the Hydromorphology of a surface water body has been significantly altered for anthropogenic purposes, such as water supply, flood protection or navigation, it can be designated as an Artificial or Heavily Modified Water Body (HMWB).

An alternative environmental objective, Good Ecological Potential (GEP) applies in these cases. In practice, this means that ecology must be as close as possible to that of a similar natural water body, but without compromising its human use. The waterbodies of relevance to the project are not classified as HMWB so the classification of these is not discussed further.

2.4 WFD Protected Areas

The WFD requires a register of protected areas. These are protected for their use (such as fisheries or drinking water) or because they have important habitat and/or species that directly depend on water. The register includes areas identified by the WFD itself or other European Directives. These may include the following:

- Areas used for water abstraction – Act No. 48/2022 – Water Environmental (Abstractions and Associated Impoundments) Act 2022;

- Areas designated for the protection of economically significant aquatic species (Directive 2000/60/EC establishing a framework for Community action in the field of water policy);
- Recreational waters (Bathing Waters Directive 2006/7/EC);
- Nutrient Sensitive Areas (Nitrates Directive 91/676/EEC, amended by Commission Directive (EU) 2026/288);
- Urban Wastewater Treatment Directive (EU) 2024/3019;
- Areas of protected species or habitats where water quality is an important factor in their protection (Natura 2000 sites under Birds Directive 2009/147/EC and Habitats Directive 92/43/EEC).

3. Assessment Methodology

3.1 Appraisal Method

Any activity that is part of the Proposed Development and that could have the potential to lower the status of any quality elements of a water body or preclude the measures necessary to achieve good status must be assessed to determine its compliance with the WFD.

Published methodologies for the assessment of plans or projects in relation to undertaking WFD assessments across all types of waterbodies that are specific to Ireland are not currently available. There is however an EU level guidance document of relevance titled 'Water Framework Directive Project assessment checklist tool' (2024), published by the Joint Assistance to Support Projects in European Regions (JASPERS). In addition, the UK Planning Inspectorate Advice Note 18: The WFD (PINS, 2017) provides guidance on the WFD process, and the information required.

There are also several guidance documents from the UK that have been developed in relation to undertaking such assessments for the different water body types, predominantly written by the UK's Environment Agency. These have been used as far as possible in the compilation of this assessment report.

The WFD compliance assessment process used for this assessment consists of various assessment stages as follows:

- Stage One: Screening (this excludes any activities that do not need to go through the scoping or impact assessment stages);
- Stage Two: Scoping (this identifies the receptors that are potentially at risk from an activity and need impact assessment); and
- Stage Three: Detailed Impact Assessment (this considers the potential impacts of an activity, identifies ways to avoid or minimise impacts, and indicates if an activity may cause deterioration or jeopardise the water body achieving Good Status).

3.2 Data Resources

A desk-based study was undertaken including a review of relevant information from the following publicly available sources and information provided by the Applicant:

- Environmental Protection Agency Online Mapping (EPA, 2026)
- HW Planning: EIA Screening Report
- MWP Document: FRA 25631-ZZ-ZZZ-RP-CE-6008-FRA-P1-S2
- MWP Document: Civil Utilities Report 25631-ZZ-ZZZ-RP-MWP-CE-6001
- MWP Document: EcIA (Ecological Impact Assessment) 25631-ZZ-ZZZ-RP-MWP-EC-6008

4. Proposed Development

The Proposed Development is located within the townland of Killowen, Kenmare, Co. Kerry, approximately 500m northeast of the Kenmare town centre. Woodland is present along the southwest boundary and represents the principal ecological feature associated with the site. The Proposed Development has been zoned R1 (New/Proposed Residential) in the Kenmare Municipal District LAP 2024-2030.

Figure 4-1 shows the Proposed Development site in the context of the wider Kenmare area. **Figure 4-2** shows the Proposed Development site on the aerial photograph.

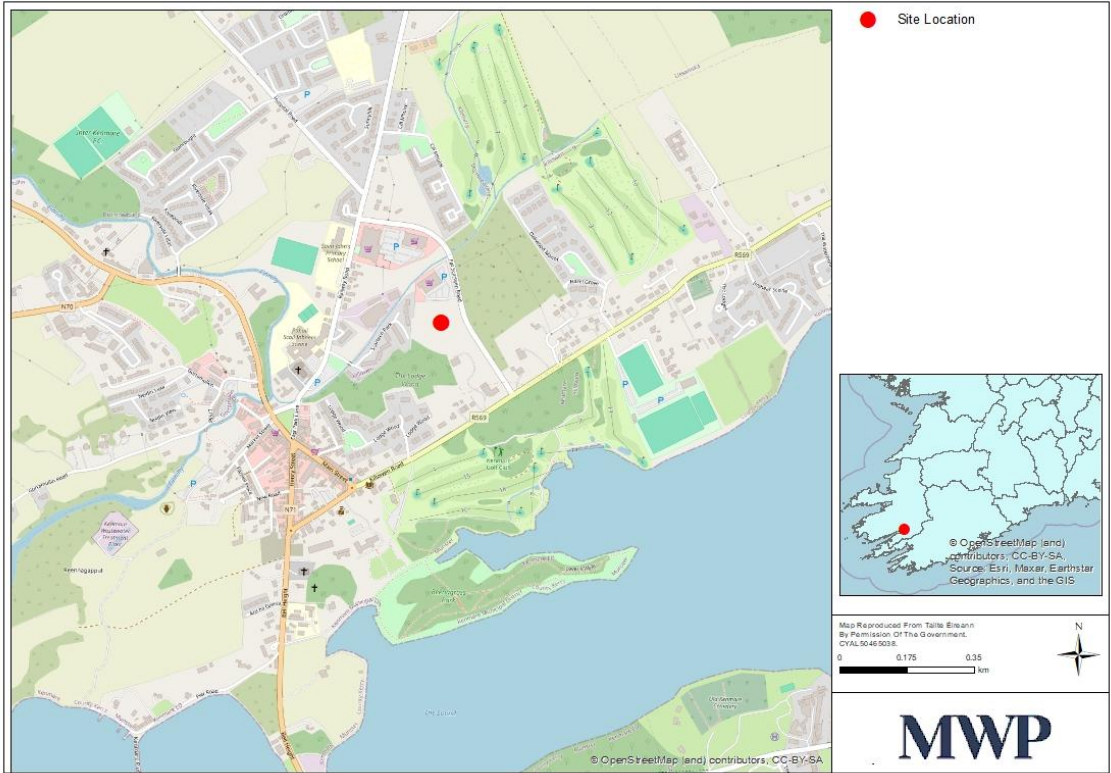


Figure 4-1: Proposed Development site in the context of the wider Kenmare area



Figure 4-2: Proposed Development site on the aerial photograph

4.1 Characteristics of the Proposed Development

The Proposed Development will be on an area of approximately 2.63ha. The Proposed Development includes the demolition of existing shed structures on-site, removal of existing concrete slab and the provision of a residential development of 100 no. residential units, landscaping and associated site development works.

The Proposed Development includes the following:

- Clearing of the site, including demolition of existing 2 No. small derelict metal-clad/wooden sheds and removal of the underlying concrete slab to allow for the construction of the proposed LRD.
- The construction of 100 No. residential units comprising of:
 - 40 No. 3-bed two storey houses
 - 60 No. own door maisonette/apartment units (30 no. 1 beds and 30 no. 2 beds)
- Ancillary infrastructure development works will include wastewater infrastructure, a pumping station, surface water attenuation, water utility services, public lighting, bin stores, bicycle stores, ESB substations, and all associated site development works.
- Vehicular access to the development will be via an upgraded and relocated entrance off the Pat Scarteen Road, with proposed upgrades including amendments to the existing shared pedestrian/cycle path and modifications to the signing and lining on the public road. The proposed development also provides for separate pedestrian/cycle entrances off Pat Scarteen Road and includes dedicated pedestrian and cycling paths traversing the site.

4.2 Drainage

The stormwater and foul water drainage arrangements for the Proposed Development are outlined in the following sections. Further information on the drainage is provided in the Civil Utilities Report which accompanies this planning application (**Document No. 25631-ZZ-ZZZ-RP-MWP-CE-6001**).

4.2.1 Storm water

Surface water runoff from the proposed hardstanding areas will be managed through a combination of conventional drainage infrastructure and Sustainable Drainage Systems (SuDS).

A conventional storm sewer network, incorporating road gullies, will be provided throughout the development spine roads to collect surface water runoff. The storm sewer network will be integrated with SuDS features, including bioretention rain gardens and filter drains, which will provide water quality treatment, promote infiltration where feasible, and attenuate surface water runoff across the site. All SuDS features will be designed with overflow connections to the storm sewer network to ensure effective drainage during extreme rainfall events. The storm sewer network will convey surface water runoff to a proposed attenuation tank. Prior to entering the attenuation tank, all runoff will pass through a petrol interceptor to remove hydrocarbons and other pollutants associated with vehicular traffic.

Surface water will be discharged from the attenuation tank at the calculated greenfield runoff rate via a Hydro-Brake flow control device. The controlled discharge will outfall to the Lissaniska_21 waterbody through a proposed headwall.

4.2.2 Foul Water

The proposed foul drainage network will discharge via gravity to a new on-site pumping station located within the development boundary. From this pumping station, foul will be conveyed via a rising main along Pat Scarteen Road, ultimately discharging into the existing public gravity foul sewer network manhole situated along the northern section of Pat Scarteen road. All works will be carried out in accordance with the requirements of Uisce Éireann.

4.3 Temporary Construction Compound

The temporary construction compound will include welfare facilities for the construction workers. It is proposed that these facilities will connect into the existing public sewer network. In the event that a temporary connection cannot be provided portaloos will be provided in the compound.

4.4 Construction Procedures

During the construction phase, the methods of working will comply with all relevant legislation and best practice guidelines. The key surface water management procedures of the project include:

- Site preparation and pre-construction activities.
- Dam the exit point of existing drain/silt traps on the existing drains.
- Settlement ponds. Up gradient clean water redirection.
- Overland discharge after settlement pond.
- A temporary construction compound will be established within the site boundary. This will be situated a minimum of 25m from any river or surface drain.
- Implementation of temporary site construction drainage system.

4.5 Waste Management

During construction, any material waste will be stored in designated sealed skips for removal from site. This will prevent any leaching of materials to the waterbodies. The construction phase waste may consist of:

- Surplus hardcore,
- Stone,
- Concrete,
- Ducting,
- Electrical wiring,
- Metal-off cuts,
- Timber,
- Plastic waste and packaging, and unused oil and diesel.

Operational waste for the residential development will be controlled by each household and dealt with by municipal services. It is estimated that approximately 44,600 litres of wastewater per day will be generated by

the Proposed Development during the operational phase. This wastewater will be managed by a connection to the public sewer system.

4.6 Controls and Monitoring Works

During construction, controls such as the following will be undertaken:

- Temporary site drainage systems will be put in place prior to the construction of the development, to prevent contaminants entering the aquatic environment.
- Surface water management controls such as settlement ponds and check dams shall be in place to prevent entry of silted run-off into the site stormwater network.
- All hydrocarbons, chemicals & oil storage tanks required for the construction stage shall be bunded to a volume not less than the greater of the following:
 - 110% of the capacity of the largest tank within the bunded area; or
 - 25% of the total volume of substance which could be stored within the bunded area.
- Refuelling of plant and machinery shall take place at dedicated refuelling areas only.

Routine inspections of construction activity and the overall development site will also be carried out on a regular basis by the Appointed Contractor to ensure that all controls to prevent environmental impacts, relevant to the construction activities taking place at the time, are in place and that all works are undertaken in compliance with these environmental controls as set out in the EIA Screening, and any other relevant Conditions of Planning.

4.7 Flood Risk

A Flood Risk Assessment (**Doc No: 25631-XX-XXX-RP-CE-6008-FRA-P1-S2**) was prepared by MWP to assess the flood risk associated with the Proposed Development site. A detailed hydraulic model was created to predict the flood zones and flood levels at the site. This demonstrated that the proposed residential development of the site is located in Flood Zone B & Flood Zone C and therefore has a moderate/low probability of flooding.

A Justification Test is required for the proposed residential development as it encroaches into Flood Zone B. A Justification Test was carried out which demonstrates that the Proposed Development is compliant with PSFRM Guidelines and the Objectives of Kerry County Development Plan 2022 – 2028.

To ensure that there is no unacceptable flood risk, the following mitigation measures are recommended:

- a) The finished floor level (FFL) of all buildings should be set above the 1% AEP flood level for the MRFS plus 500mm freeboard. This recommendation is in line with the requirements of Criterion 3 of the Greater Dublin Strategic Drainage Study (GDSDS), 2005. On this basis, the design flood level ranges from 6.75 mOD to 8.25mOD. The proposed minimum F.F.L of the residential units ranges from 7.60mOD to 10.20mOD and any proposed F.F.L is a minimum of 500mm above the adjacent design flood level.
- b) The land within the site will be raised above the design flood level.
- c) Surface water drainage from the Proposed Development site will manage the associated pluvial flood risk using a suitably design surface water management strategy that incorporates Sustainable Urban Drainage System (SUDs).

It was also concluded that, once these mitigation measures are implemented, the Proposed Development would not have an adverse impact on flooding on third party lands upstream or downstream of the Proposed Development site.

5. Receiving Environment

5.1 Catchment Description

The Proposed Development site is located within Water Framework Directive (WFD) catchment 21, also known as Dunmanus-Bantry-Kenmare catchment.

According to the EPA (2024) HA21 Dunmanus-Bantry-Kenmare Catchment Summary WFD Cycle 3) available at <https://www.catchments.ie/data>, this catchment includes the area drained by all streams entering tidal water in Dunmanus, Bantry and Kenmare Bays between Mizen Head and Glanearagh Head, Co. Kerry, draining a total area of 1,898km². The largest urban centre in the catchment is Bantry. The other main urban centre in this catchment is Kenmare. The total population of the catchment is approximately 24,280 with a population density of 13 people per km². This catchment is dominated by the east-west trending series of sandstone ridges and limestone valleys that dominate the landscape of south and west Munster. In this catchment, the limestone valleys are nearly completely submerged by the sea – having been preferentially eroded compared to the sandstone ridges lying between them and these valleys now make up Dunmanus, Bantry and Kenmare Bays while sandstone ridges form the Mizen, Sheep's Head, Beara and Iveragh Peninsulas.

The Dunmanus-Bantry-Kenmare catchment is divided into 20 sub catchments with 91 river waterbodies, 39 lakes, 14 transitional, six coastal waterbodies and eight groundwater bodies.

The Proposed Development site lies within the Finnihy_SC_010 Water Framework Directive (WFD) Sub-Catchment (ID: 21_13) within the Dunmanus-Bantry-Kenmare WFD. See **Figure 5-1** and **Figure 5-2**.

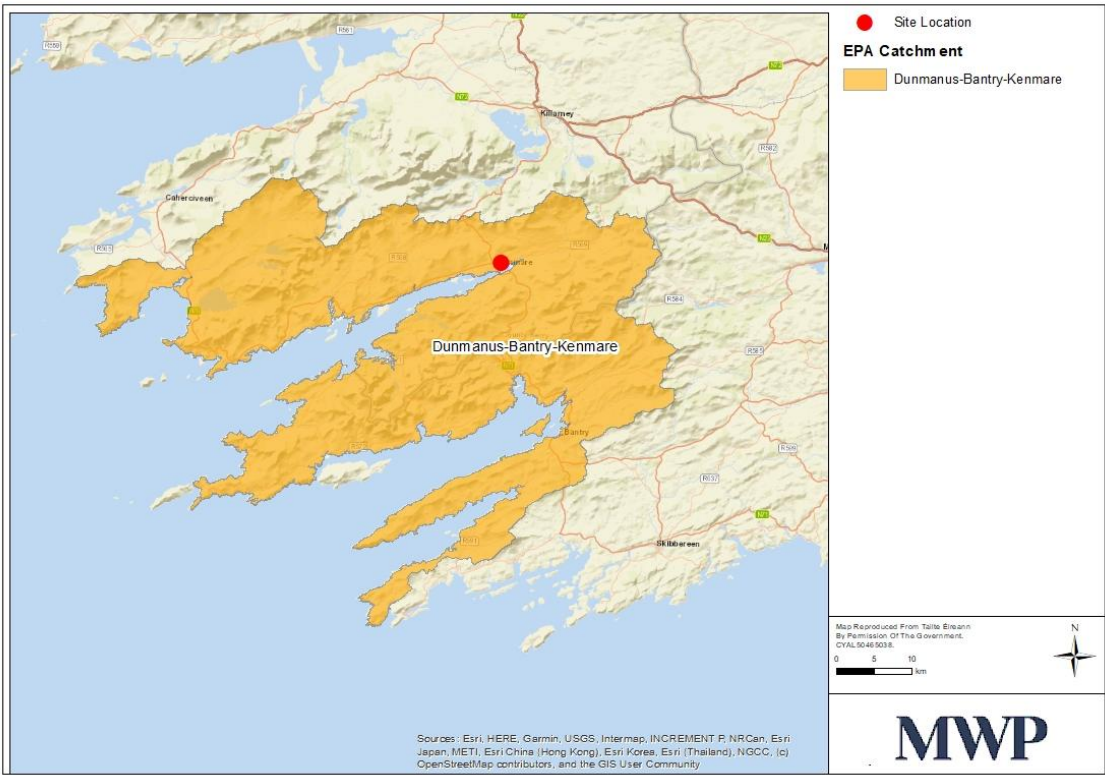


Figure 5-1: Dunmanus-Bantry-Kenmare Catchment

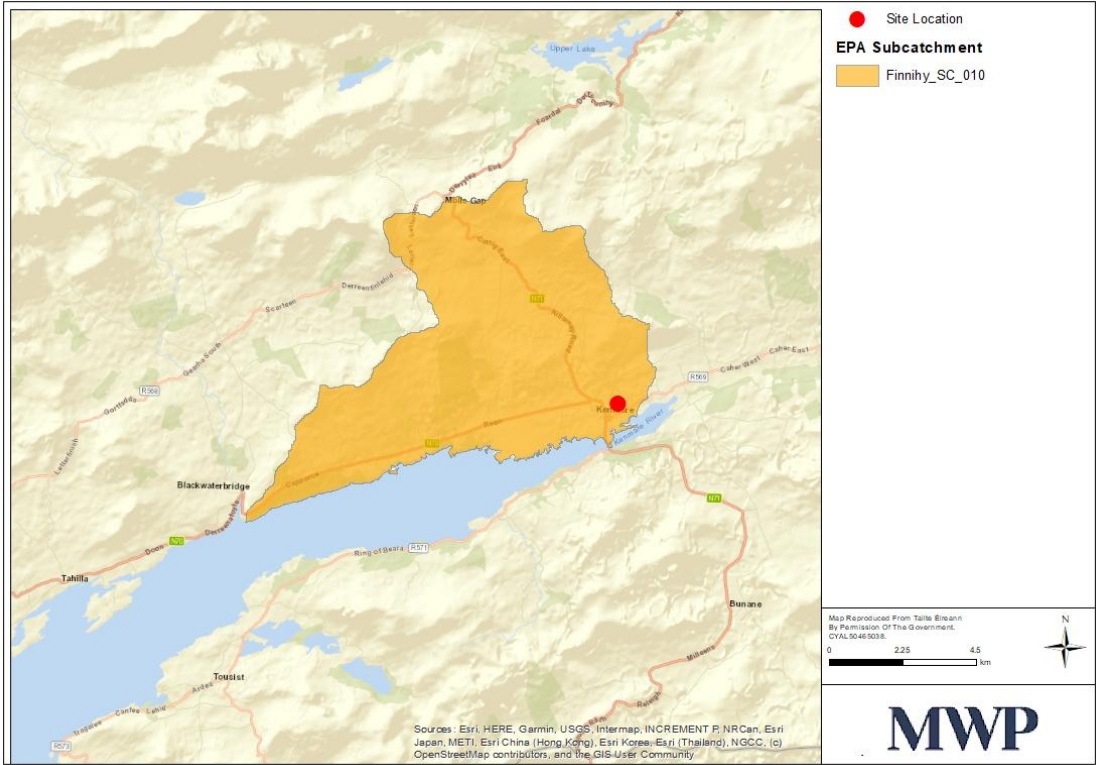


Figure 5-2: Finnihy_SC_010 Water Framework Directive (WFD) Sub-Catchment

See **Figure 5-4** for the location of the waterbodies in the vicinity of the Proposed Development site.

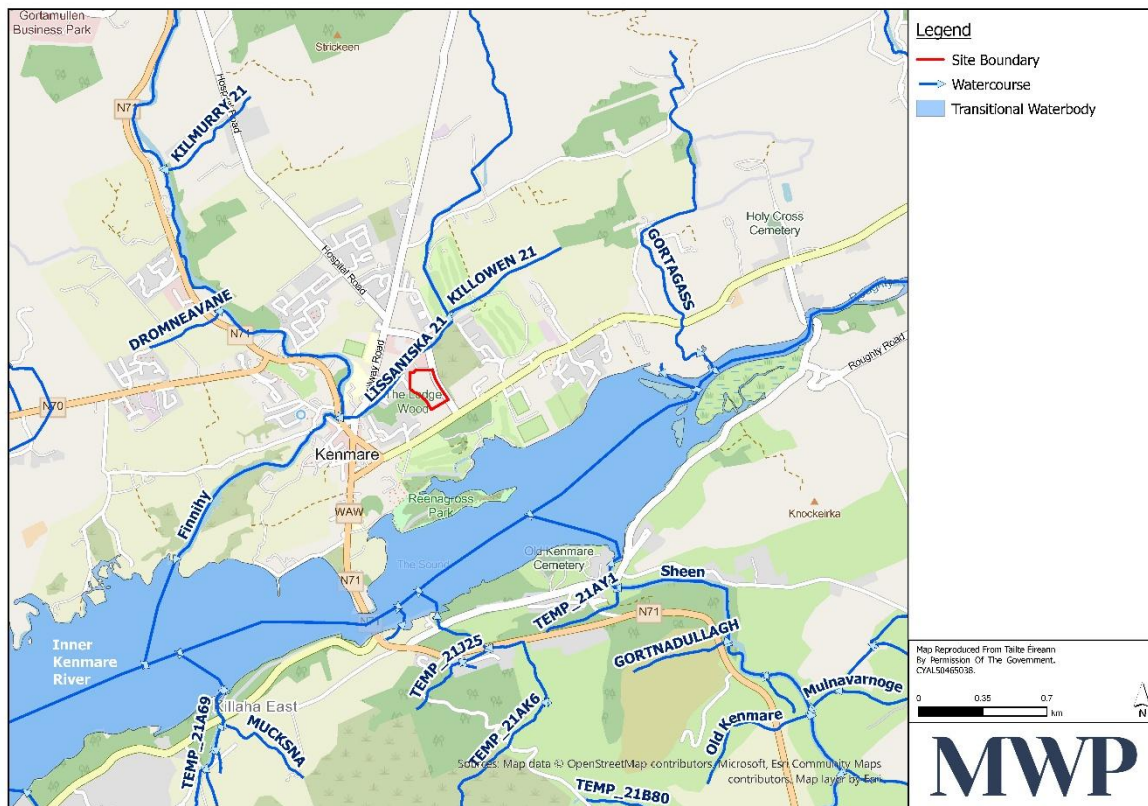


Figure 5-4: Surface Waterbodies

5.2.3 Water Quality and Waterbodies Risk Status

There are two water quality monitoring stations in the area surrounding the Proposed Development site.

The closest water quality monitoring station with monitored Q values is Finnihy – Kenmare – Finnihy Br (RHS) (Code: RS21F010500) which is located approximately 454m to the southwest of the Proposed Development. This station monitors the river water of Finnihy River which has a ‘Moderate’ Q Value. There is another water quality monitoring station with monitored Q values downstream of the Finnihy River known as Kenmare: Finnihy Br (LHS) (Code: RS21F010510) which is located approximately 473m south west of the Proposed Development. This station monitors the river water of Finnihy River which has a ‘Moderate’ Q Value.

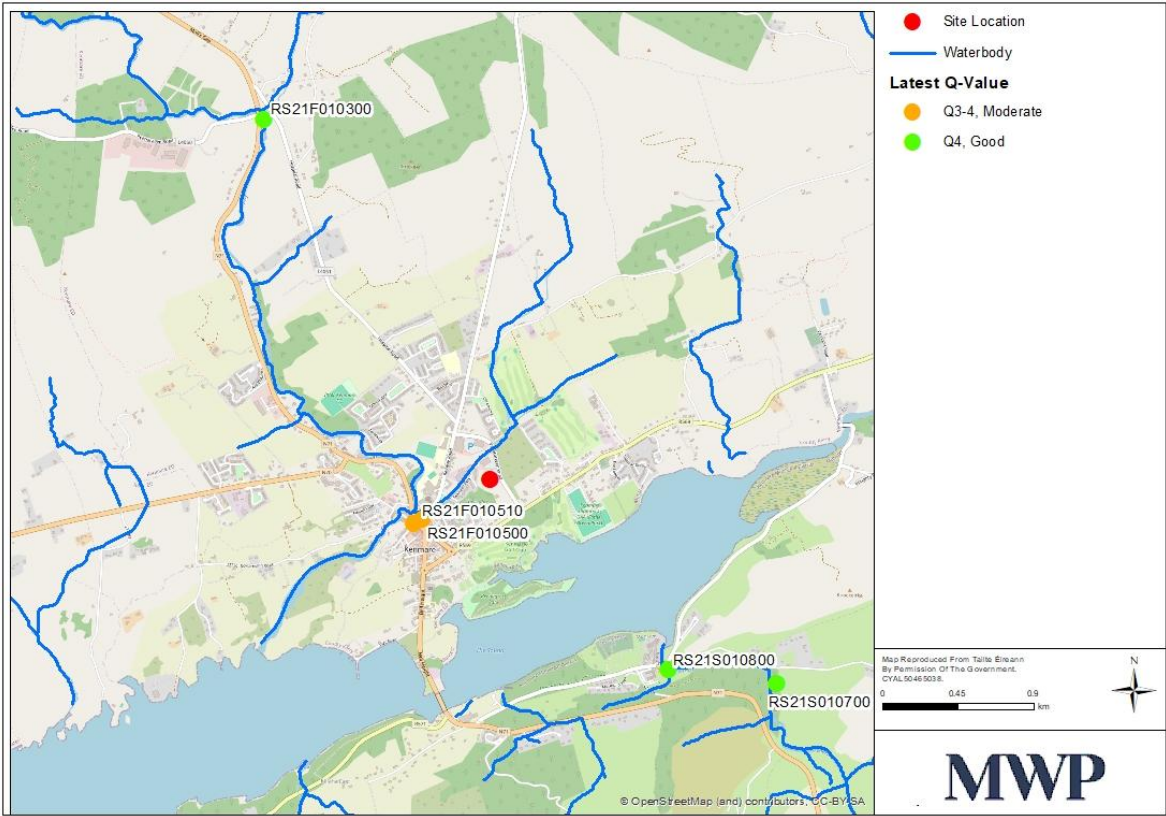


Figure 5-5: Water Quality Monitoring Value

The WFD River Waterbodies Risk Status represents the risk of each waterbody failing to meet their WFD objectives by 2027.

Table 5-1 provides a summary of the WFD status for the identified surface waterbodies, and the pressures they are experiencing.

All data relating to water features was obtained from Environmental Protection Agency (EPA) interactive map viewer.

Table 5-1: Surface Waterbody Status

Waterbody Name (Code)	Type	Status 2013-2018	Status 2016- 2021	Status 2019-2024	At Risk of Not Achieving Good Status	Pressures*
Lissaniska 21 (WFD code: IE_SW_21F010510)	Surface Water	Moderate	Moderate	Moderate	At risk	DWTS, HYMO, UR
Finnihy (WFD code: IE_SW_21F010510)	Surface Water	Moderate	Moderate	Moderate	At risk	DWTS, HYMO, UR

Waterbody Name (Code)	Type	Status 2013-2018	Status 2016- 2021	Status 2019-2024	At Risk of Not Achieving Good Status	Pressures*
Inner Kenmare River (WFD code: IE_SW_190_0300)	Surface Water	Good	Good	Good	Not at risk	No pressures

*DWTS Domestic Wastewater Treatment System

*HYMO Hydromorphological Pressures

*UR Urban Run-off

5.3 Relevant Groundwater Body and Status

5.3.1 WFD Groundwater Body

The Groundwater Body (GWB) underlying the site is the Kenmare (GWB) (EU Code: IE_SW_G_040).

Groundwater Vulnerability is a term used to represent the intrinsic geological and hydrogeological characteristics that determine the ease with which groundwater may be contaminated generally by human activities. Groundwater vulnerability maps are based on the types and thickness of subsoils (sands, gravels, glacial tills (or boulder clays), peat, lake and alluvial silts and clays), and the presence of karst features. The predominant quaternary sediment type underlying the Proposed Development site is 'Alluvium'.

The Geological Survey of Ireland (GSI) have mapped groundwater vulnerability as 'moderate' at the Proposed Development site. See **Figure 5-6**.

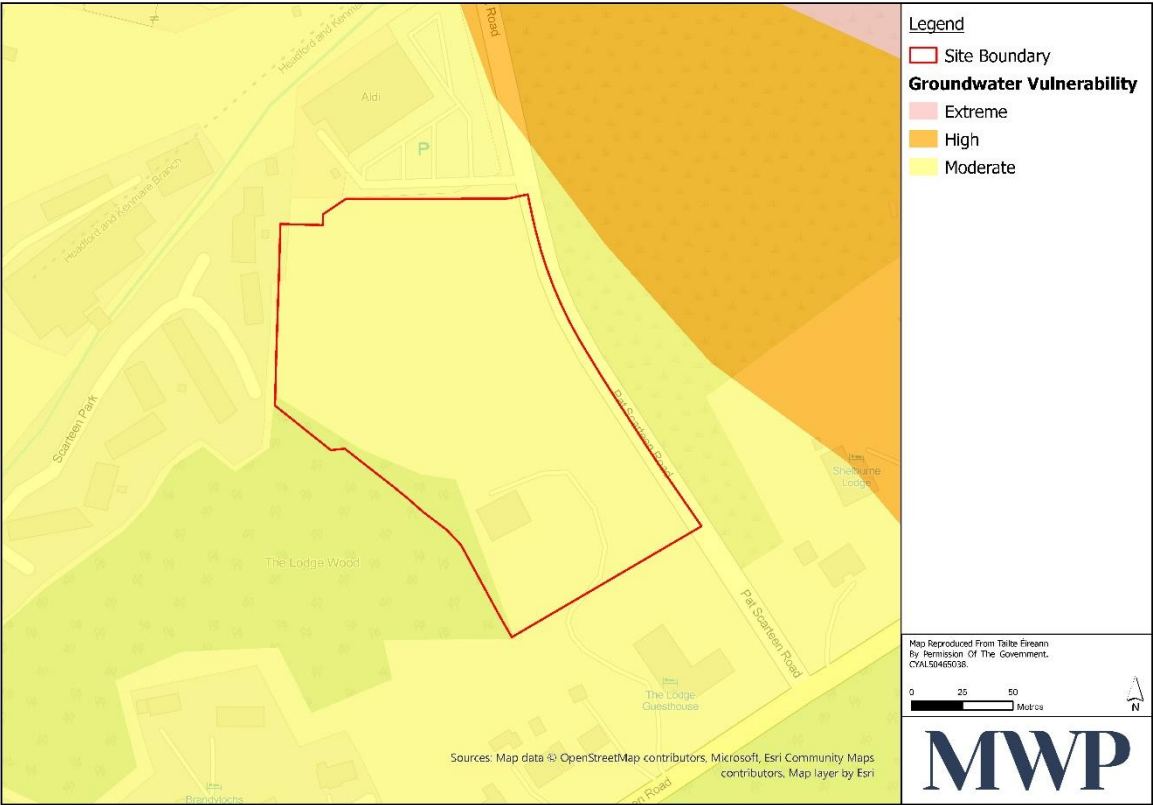


Figure 5-6: Groundwater Vulnerability

The aquifer underlying the site, according to GSI (www.gsi.ie/mapping), is a Locally Important Aquifer – Karstified (diffuse) as shown in Figure 5-7.

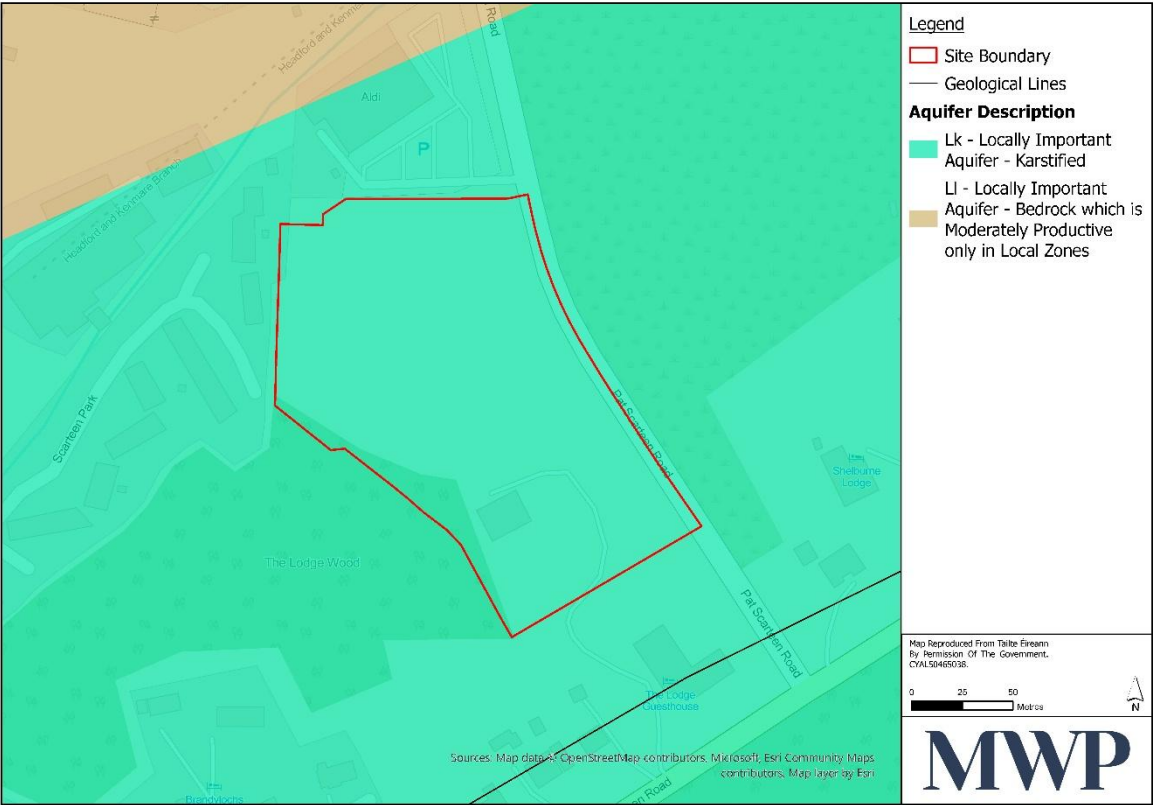


Figure 5-7: Groundwater Aquifer Classification

5.3.2 Groundwater Quality and Risk Status

Currently, the EPA classifies the Kenmare GWB as having an overall status (2019-2024) of ‘Good’ with a current WFD risk score of ‘Not at risk’ of not maintaining good status under the WFD as shown in **Figure 5-8**.

Table 5-2 provides a summary of the WFD status for the ground waterbody, and the pressure it is experiencing.

All data relating to water features was obtained from the Environmental Protection Agency (EPA) interactive map viewer.

Table 5-2: Groundwater Status

Waterbody Name (Code)	Type	Status 2013-2018	Status 2016-2021	Status 2019-2024	At Risk of Not Achieving Good Status	Pressures
Kenmare (IE_SW_G_040)	Groundwater	Good	Good	Good	Not at risk	None



There are several waterbodies designated for Abstraction for Drinking Water under Article 7 of the WFD. These are designated as 'All bodies of water used for the abstraction of water intended for human consumption providing more than 10m³ a day as an average or serving more than 50 persons, and those bodies of water intended for such future use'. According to the EPA maps (Article 7 Abstraction for Drinking Water,) there are no surface water drinking water sources at the Proposed Development or within 2km of the Proposed Development.

The Geological Society of Ireland delineates Public Supply Protection Areas for drinking water to protect these public water supplies. These are split into inner and outer protection areas, with the inner area designed to prevent immediate threats to the water source. The outer area encompasses the Zone of Contribution (ZoC) that contributes to the inner areas water supply. There are no public water supply (PWS) or group water scheme (GWS) sources located in the vicinity of the Proposed Development. The closest PWSs is to the east, which is Carrignadoura GWS, approximately 23km from the Proposed Development Site.

September 2026

5.5 Bathing Waters

Bathing waters are designated under Regulation 5 of Directive 2006/7/EC. Designated Bathing Waters exist under S.I. No. 79/2008 and S.I. No. 351/2011 Bathing Water Quality (Amendment) Regulations 2011. EC Bathing Water Profiles – Best Practice and Guidance 2009. The closest designated Bathing Water location is Doire Fhionáin (Derrynane) (IESWBWC150_0000_0100) located approximately 40km from the Proposed Development site. This site has a bathing water quality status of 'Excellent Water Quality'.

5.6 Nutrient Sensitive Areas

Nutrient sensitive areas are identified in the Dunmanus-Bantry-Kenmare Catchment Report Cycle 3, from May 2024. There are no designated nutrient sensitive rivers within the vicinity of the Proposed Development. Lough Leane (IE_SW_22_185) however is a designated nutrient sensitive lake but there is no direct hydrological connection between Lough Leane and the Proposed Development, see **Figure 5-9**. There are no protected rivers in the vicinity of the site under the Salmonid River Regs (S.I. No. 293/1988). The closest is the Lee [Cork] (IE_SW_19L030040) located approximately 19km to the south east of the Proposed Development site which has no hydrological connection to the site.

The closest aquaculture site is Kenmare River which is approximately 3.7km to the southwest of the site and is licensed as an aquaculture site as a Fishery Order, license no. T06-388A. The area of the order is 2.25ha. The closest shellfish area is Kenmare River/Sneem/Ardgroom (IE_SW_190_0000) which is approximately 6km to the southwest of the Proposed Development.

Figure 5-10 shows the nearest designated aquaculture site and shellfish areas to the Proposed Development site.

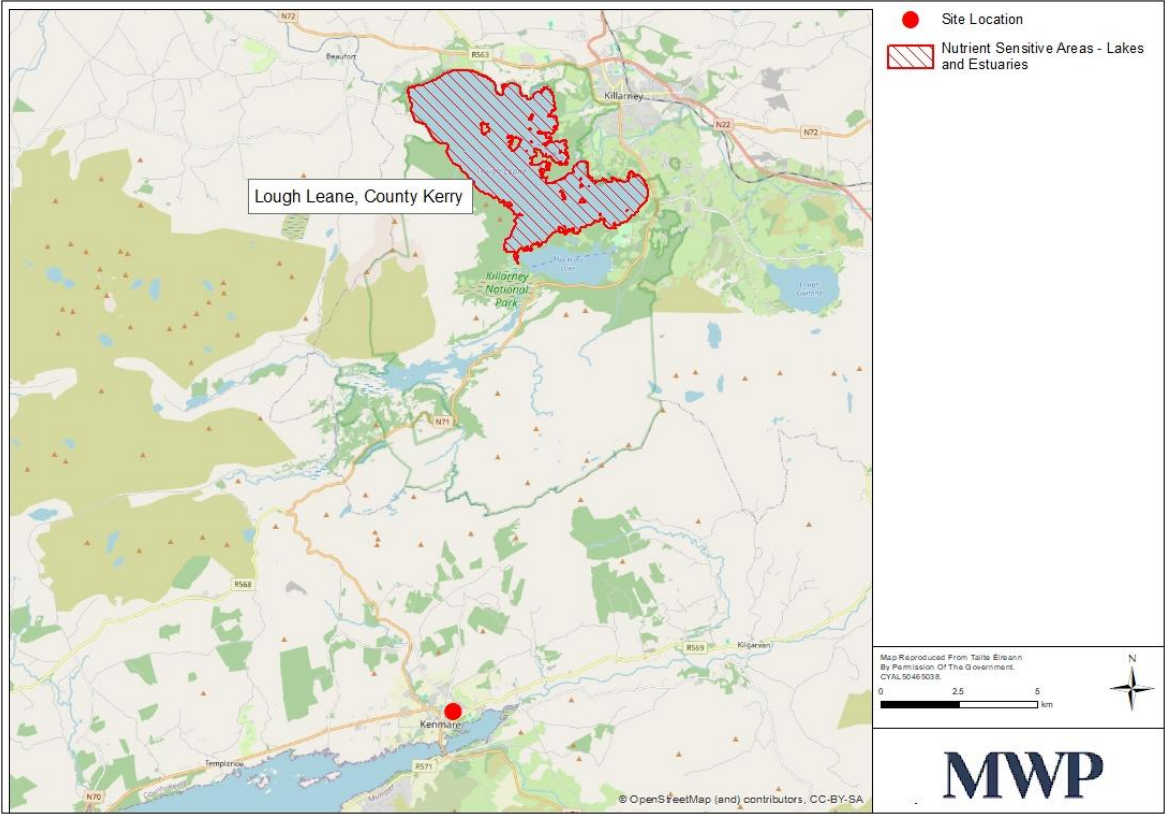


Figure 5-9: Nutrient Sensitive Areas

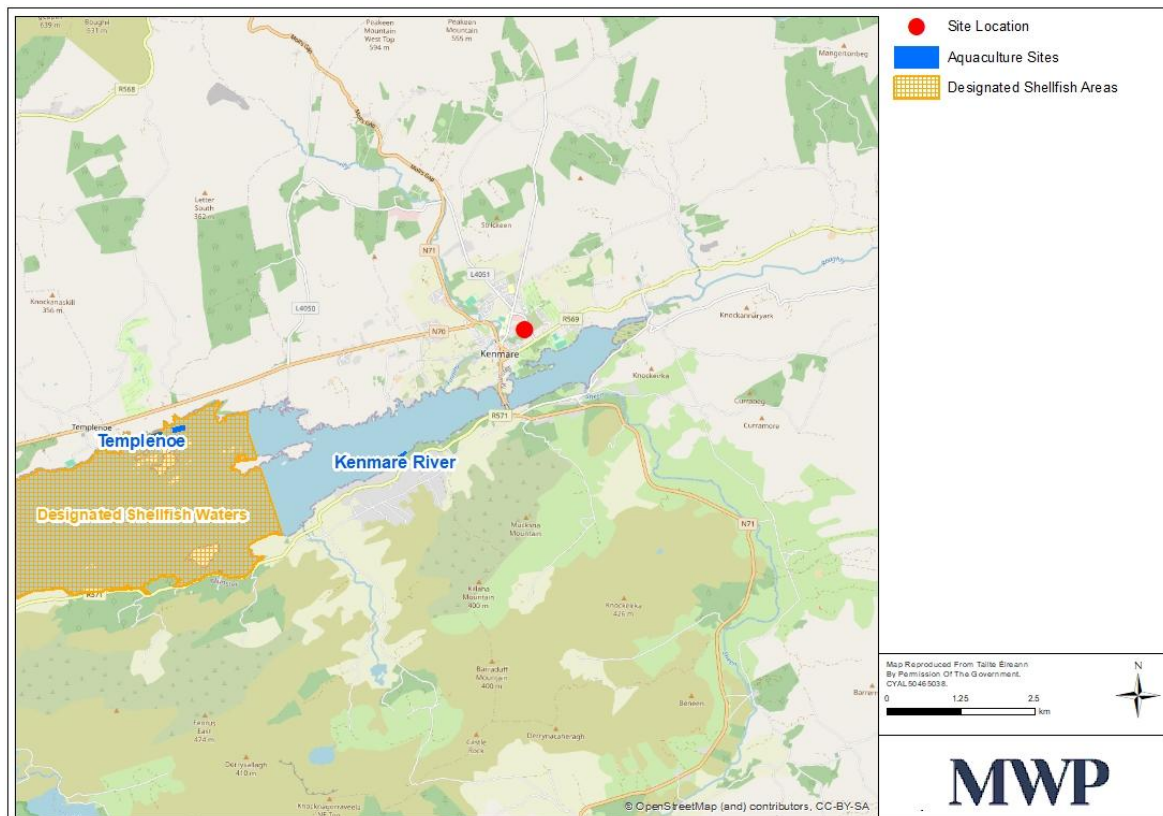


Figure 5-10: Designated Shellfish Areas and Aquaculture Sites

5.7 Protected Sites

5.7.1 Natura 2000 Sites

The Proposed Development site is not located within a Special Area of Conservation (SAC) or Special Protection Area (SPA) collectively known as Natura 2000 sites or within a proposed Natural Heritage Area (pNHA) or designated Natural Heritage Area (NHA). The Appropriate Assessment Screening (**Doc No. 25631-ZZ-ZZZ-RP-MWP-EC-6007**) completed as part of the planning application documents identified 15 No. Natura 2000 sites comprising 13 No. SACs and 2 No. SPAs occurring within the potential zone of influence (ZOI) of the Proposed Development site. See **Figure 5-11** for Natura 2000 sites located in the vicinity of the Proposed Development.

- Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC
- Killarney National Park SPA
- Eirk Bog SPA
- Old Domestic Building, Curraglass Wood SAC
- Kilgarvan Ice House SAC
- Mucksna Wood SAC
- Blackwater River (Kerry) SAC

- Glanlough Woods SAC
- Old Domestic Building Dromore Wood SAC
- Kenmare River SAC
- Maulagowna Bog SAC
- Cloonee and Inchiquin Loughs, Uragh Wood SAC
- Derryclogher (Knockboy) Bog SAC
- Glengarriff harbour and Woodland SAC
- Caha Mountains SAC

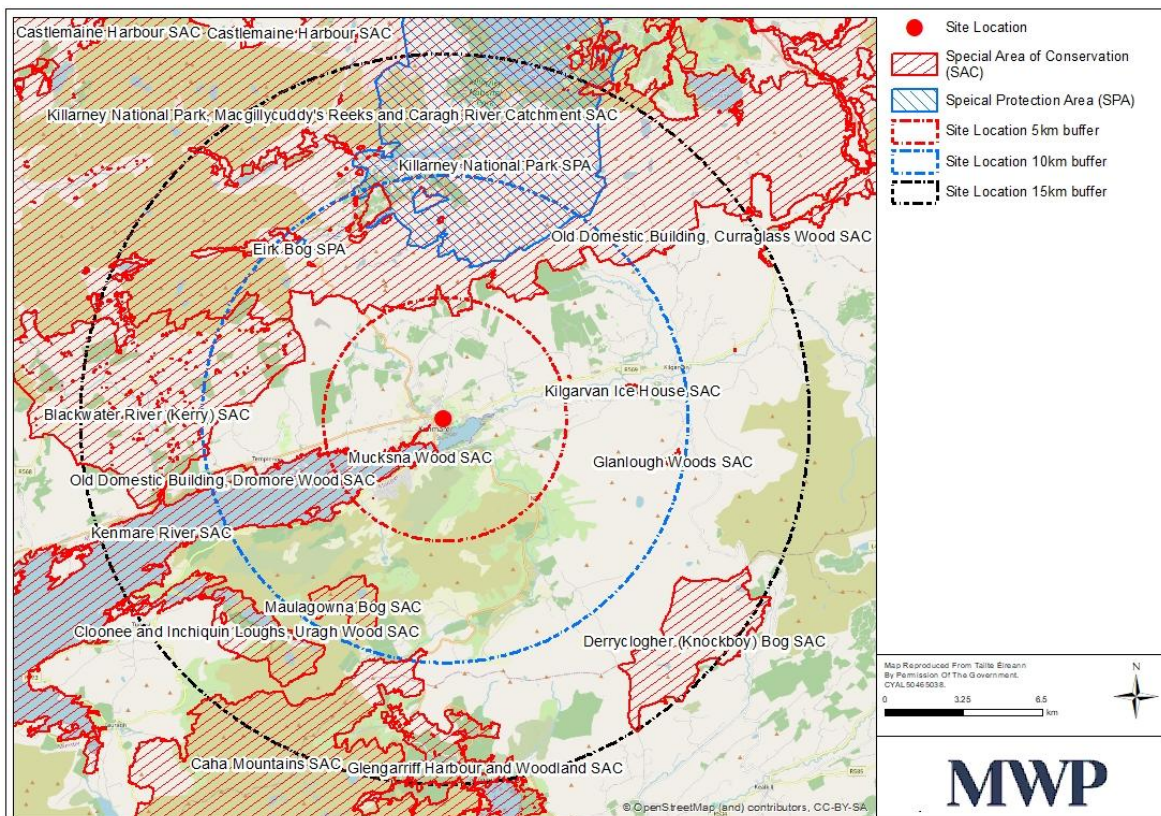


Figure 5-11: European sites located within the potential ZOI of the Proposed Development

5.7.2 Nationally Designated Conservation Sites

There are 9 pNHAs and 1 NHA within the Zone of influence listed as follows and shown in Figure 5-12.

- Doughill Bog NHA
- Roughty River Estuary pNHA
- Kenmare River Islands pNHA
- Muckna Wood pNHA
- Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment pNHA

- Kilgarvan Ice House pNHA
- Maulagowna Bog pNHA
- Old Domestic Building, Lettir pNHA
- Caha Mountains pNHA
- Old Domestic Building, Dromore Wood pNHA

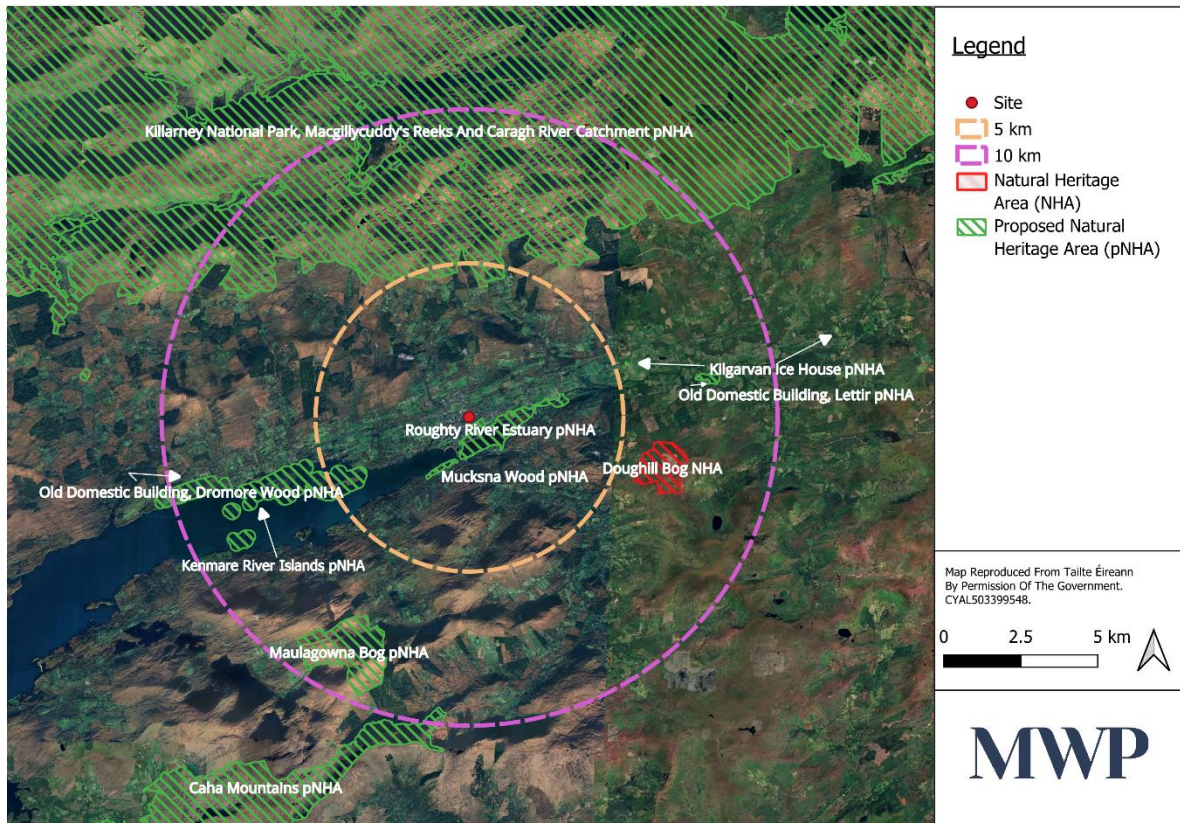


Figure 5-12: Nationally Designated Conservation Sites

6. Compliance Assessment

Any activity that is part of the Proposed Development and that could have the potential to lower the status of any of the quality elements of a water body or preclude the measures necessary to achieve at least good status must be assessed to determine its compliance with the WFD.

Stage 1: Screening aims to determine if the Proposed Development has impact pathways to WFD waterbodies. This includes collating available information on the project and baseline environment of the waterbodies which could potentially be impacted. Should there be an activity that is determined to be screened in for further assessment, this will move forward to Stage 2: Scoping. During this stage, if an impact is screened in, this will be carried forward to Stage 3: Impact Assessment.

6.1 Stage One: Screening

Stage 1 is to identify the extent to which the proposal is likely to affect the waterbodies and to identify what activities should go through the scoping or impact assessment stages. This section therefore:

- Defines which activities have been screened in for further assessment, considering the activities that may result from construction and operation of the Proposed Development that could directly or indirectly impact waterbodies.
- Identifies the relevant waterbodies (surface and groundwater) that could be directly or indirectly impacted by the Proposed Development and defines which waterbodies have been screened in for further assessment.

In order to undertake the screening assessment and identify waterbodies that are potentially at risk, the project was divided into phases and activities, see **Table 6-1**. The operational life of the Proposed Development is expected to be in excess of 50 years. There is no decommissioning envisaged for the Proposed Development.

Table 6-1: Project Phases and Activities

Project Phase	Activity
Construction	• Site Clearing • Excavation and stockpiling of soils. • Construction of temporary site offices and foundations. • The construction of 100 No. residential units. • The construction of approximately 112 No. car parking spaces proposed throughout the site. • Use of fuels. • Use of concrete. • Ancillary works.
Operation	• Foul water discharges during operation. • General maintenance works.

The results of the screening exercise are summarised in **Table 6-2**.

Table 6-2: Results of Screening Exercise

Phase	Activity	Water Resource	Water Body Name and ID Number	Impact	Screening for Further Assessment	Justification
Construction	In Stream Works for the Installation of the Headwall Outfall	Groundwater	Kenmare (IE_SW_G_040)	Potential for temporary disturbance to the channel bed, banks and riparian zone resulting in increased turbidity, changes in channel morphology and increased flow velocities.	Screened Out	The proposed works are localised, short-term, and confined to the immediate construction area. No significant groundwater abstraction, dewatering, or alteration of groundwater flow is required, and standard pollution prevention measures will be implemented.
		Surface Water	Lissaniska 21 (IE_SW_21F010510)		Screened In	The construction of the proposed headwall outfall will discharge into the Lissaniska_21 waterbody. Given the direct hydrological connection between the works area and the receiving waterbody Lissaniska_21, there is potential for construction related effects. The Lissaniska 21 waterbody joins the Finnihy waterbody which subsequently discharges into the Inner Kenmare River providing a potential hydrological connection.
			Finnihy (IE_SW_21F010510)			
			Inner Kenmare River (IE_SW_190_0300)			
Construction	Site Clearing and Excavation	Groundwater	Kenmare (IE_SW_G_040)	Potential for sediment and contaminants from the excavation of	Screened In	Potential for material from the excavation works and stockpiling to enter the groundwater body.

Phase	Activity	Water Resource	Water Body Name and ID Number	Impact	Screening for Further Assessment	Justification
		Surface Water	Lissaniska 21 (IE_SW_21F010510)	material to enter the waterbodies via run-off, particularly during periods of heavy rainfall.	Screened In	Due to the proximity of the Proposed Development, the nearby surface waters have been screened in as the proposed stormwater from the development will be discharged into the Lissaniska 21 waterbody which then joins the Finnihy waterbody and discharges into the Inner Kenmare River.
			Finnihy (IE_SW_21F010510)			
			Inner Kenmare River (IE_SW_190_0300)			
Construction	Potential spillage/leaks of hydraulic oils from the plant.	Groundwater	Kenmare (IE_SW_G_040)	Potential for run-off from machinery to enter waterbodies, particularly during periods of heavy rainfall. Potential to enter groundwater body during a spill event.	Screened In	Works and activity are located on the GWB, and potential spills or leaks could leach through soil and into GWB.
		Surface Water	Lissaniska 21 (IE_SW_21F010510)		Screened In	Due to the proximity of the Proposed Development, the nearby surface waters have been screened in as the proposed stormwater from the development will be discharged into the Lissaniska 21 waterbody which then joins the Finnihy waterbody and discharges into the Inner Kenmare River.
			Finnihy (IE_SW_21F010510)			
			Inner Kenmare River (IE_SW_190_0300)			
Construction	Use of concrete to form foundations for the Proposed Development.	Groundwater	Kenmare (IE_SW_G_040)	Potential for run-off from concrete pouring to enter waterbodies. Potential to enter the groundwater body during a spill event.	Screened In	Potential for run-off from concrete pouring to enter the groundwater body.
		Surface Water	Lissaniska 21 (IE_SW_21F010510)		Screened In	Due to the proximity of the Proposed Development, the nearby surface waters have been screened in as the proposed stormwater from the development will be
			Finnihy (IE_SW_21F010510)			

Phase	Activity	Water Resource	Water Body Name and ID Number	Impact	Screening for Further Assessment	Justification
			Inner Kenmare River (IE_SW_190_0300)			discharged into the Lissaniska 21 waterbody which then joins the Finnihy waterbody and discharges into the Inner Kenmare River.
Operational	Foul water discharges during operation.	Groundwater	Kenmare (IE_SW_G_040)	Potential impact on water quality as a result of discharge of contaminants associated with foul water discharges during operational activities.	Screened Out	Based on the design of the Proposed Development, there is limited potential sources of contamination during the Operational Phase and there will be limited potential for discharge of contaminants associated with foul water discharges to groundwater. The foul water will connect to the municipal treatment plant (D0184-Kenmare) before discharging to surface waters.
		Surface Water	Lissaniska 21 (IE_SW_21F010510)		Screened Out	The foul water from the Proposed Development will not be discharged to the Lissaniska 21 waterbody.
			Finnihy (IE_SW_21F010510)		Screened In	There is an indirect hydrological connection via the proposed connection to the Kenmare Wastewater Treatment Plant (WWTP), which will receive wastewater from the Proposed Development and discharge treated effluent to the Inner Kenmare River and the estuarine waters of the Finnihy River.
			Inner Kenmare River (IE_SW_190_0300)			

Phase	Activity	Water Resource	Water Body Name and ID Number	Impact	Screening for Further Assessment	Justification
Operational	Storm water discharges during operation	Groundwater	Kenmare (IE_SW_G_040)	Potential impact on water quality as a result of increased runoff rates with storm water discharges during operational activities.	Screened Out	Increased runoff from storm water drainage is directed to the designed storm water drainage system and not the GWB.
		Surface Water	Lissaniska 21 (IE_SW_21F010510) Finnihey (IE_SW_21F010510) Inner Kenmare River (IE_SW_190_0300)		Screened In	Direct hydrological connection to the Proposed Development site via proposed storm water drain. Appropriate drainage design in the form of SuDS will prevent any potential impact to the receiving water quality of downstream waterbodies, specifically attenuation tanks.
Operational	General Maintenance Works	Groundwater	Kenmare (IE_SW_G_040)	Potential for run-off to enter waterbodies, particularly during periods of heavy rainfall.	Screened Out	Based on the design of the Proposed Development, there is limited potential sources of contamination during the Operational Phase. Appropriate drainage design in the form of SuDS will prevent any potential impact to the receiving water quality of downstream waterbodies. General maintenance operations are routine, localised and non-intrusive in nature and will not involve significant ground disturbance. All operational works will be undertaken in accordance with best practice measures.
		Surface Water	Lissaniska 21 (IE_SW_21F010510)			
			Finnihey (IE_SW_21F010510)			
			Inner Kenmare River (IE_SW_190_0300)			

6.2 Stage Two: Scoping

A Stage 2 Scoping Assessment is required as the Kenmare GWB waterbody and Lissaniski 21, Finnihy and Inner Kenmare River have been determined to 'Screen in' for the scoping assessment based on the probability of an impact occurring due to the associated works for the Proposed Development. The aim of the scoping stage is to identify receptors within the waterbodies brought forward which may be impacted. These receptors include:

- Hydromorphology
- Habitats
- Aquatic Species
- Water Quality
- Protected Areas

The scoping assessment was undertaken, and the results are presented in **Table 6-3**. For the Kenmare GWB, Water Quality, Hydromorphology and Protected Areas are the only identified relevant receptors. For the surface waterbodies Lissaniska 21, Finnihy and Inner Kenmare River, water quality, hydromorphology, aquatic species, protected areas and habitats are the identified relevant receptors.

Table 6-3: Results of Scoping Exercise

Phase	Activity	Water Resource	Waterbody Name and ID Number	Receptors	Scoped for Impact Assessment	Rationale /Justification
Construction	In Stream Works for the Installation of Headwall Outfall	Surface Water	Lissaniska 21 (IE_SW_21F010 510)	Water Quality	Yes	Potential for sediment mobilisation from instream works to negatively affect water quality.
			Finnihy (IE_SW_21F010 510)	Hydromorphology	Yes	Potential for the Proposed Development to alter the hydromorphology of the Lissaniska_21 due to minor localised alteration of the channel form at the outfall location. There will be no hydromorphology impact on the Finnihy and Inner Kenmare River.
			Inner Kenmare River (IE_SW_190_03 00)	Protected Areas	Yes	Potential for sediment mobilisation to enter the Lissaniska 21 waterbody due to in stream works and then enter the Finnihy which discharges into the Inner Kenmare River (WFD code: IE_SW_190_0300) which is in an SAC.
				Aquatic Species	Yes	Potential for sediment mobilisation from instream works to negatively affect aquatic species.
				Habitats	Yes	Potential for sediment mobilisation from instream works to negatively affect habitats.
Construction	Site clearing and excavation	Groundwater	Kenmare (IE_SW_G_040)	Water Quality	Yes	Potential for the excavation of material to enter the waterbodies, particularly during periods of heavy rainfall and negatively affect the water quality.
				Hydromorphology	No	The works and activities for the Proposed Development will not alter the hydromorphology of the GWB.

Phase	Activity	Water Resource	Waterbody Name and ID Number	Receptors	Scoped for Impact Assessment	Rationale /Justification
		Surface Water	Lissaniska 21 (IE_SW_21F010 510) Finnihy (IE_SW_21F010 510) Inner Kenmare River (IE_SW_190_03 00)	Protected Areas	Yes	The Proposed Development occurs over the Kenmare GWB, which is designated for Drinking Water Abstraction under Article 7 of the WFD.
				Water Quality	Yes	Potential for the excavation of material to enter the waterbodies, particularly during periods of heavy rainfall and negatively affect water quality.
				Hydromorphology	No	The works and activities for the Proposed Development will not alter the hydromorphology of the surface water bodies.
				Protected Areas	Yes	Potential for site run-off to enter the Lissaniska 21 and Finnihy waterbody due to close proximity and then enter the Inner Kenmare River (WFD code: IE_SW_190_0300) which is within the Kenmare River SAC.
				Aquatic Species	Yes	Potential for site run-off to enter the waterbody and negatively affect aquatic species.
				Habitats	Yes	Potential for site run-off to enter the waterbody and negatively affect habitats.
Construction	Potential spillage / leaks of hydraulic oils from the plant	Groundwater	Kenmare (IE_SW_G_040)	Water Quality	Yes	Potential for hydraulic oils from construction or spill events to penetrate the soils and enter the Kenmare GWB.
				Hydromorphology	No	The works and activities for the Proposed Development will not alter the hydromorphology of the Kenmare GWB.
				Protected Areas	Yes	The Proposed Development occurs over the Kenmare GWB, which is designated for Drinking Water Abstraction under Article 7 of the WFD.

Phase	Activity	Water Resource	Waterbody Name and ID Number	Receptors	Scoped for Impact Assessment	Rationale /Justification
		Surface Water	Lissaniska 21 (IE_SW_21F010 510)	Water Quality	Yes	Potential for hydraulic oils from construction or spill events to enter the waterbodies and negatively affect the water quality.
			Finnihy (IE_SW_21F010 510)	Hydromorphology	No	The works for the Proposed Development will not alter the hydromorphology of surface waterbodies.
			Inner Kenmare River (IE_SW_190_03 00)	Protected Areas	Yes	Potential for hydraulic oils from construction or spill events to enter the Lissaniska 21 and Finnihy waterbody due to close proximity and then enter the Inner Kenmare River (WFD code: IE_SW_190_0300) which is in an SAC.
				Aquatic Species	Yes	Potential for hydraulic oil from construction or spill events to enter the waterbody and negatively affect the aquatic species.
				Habitats	Yes	Potential for hydraulic oil from construction or spill events to enter the water body and negatively affect habitats.
Construction	Concrete Pouring	Groundwater	Kenmare (IE_SW_G_040)	Water Quality	Yes	Potential for concrete material from construction works or spill events to percolate through the soils and enter the GWB.
				Hydromorphology	No	The works and activities for the Proposed Development will not alter the hydromorphology of the GWB.
				Protected Areas	Yes	The Proposed Development occurs over the Kenmare GWB, which is designated for Drinking Water Abstraction under Article 7 of the WFD.

Phase	Activity	Water Resource	Waterbody Name and ID Number	Receptors	Scoped for Impact Assessment	Rationale /Justification
		Surface Water	Lissaniska 21 (IE_SW_21F010 510) Finnihy (IE_SW_21F010 510) Inner Kenmare River (IE_SW_190_03 00)	Water Quality	Yes	Potential for concrete material from construction works or spill events to enter the waterbodies, particularly during periods of heavy rainfall, due to the proximity of the surface waterbody and negatively affect the water quality.
				Hydromorphology	No	The works and activities for the Proposed Development will not alter the hydromorphology of the surface waterbody.
				Protected Areas	Yes	Potential for concrete material from construction or spill events to enter the Inner Kenmare River (WFD code: IE_SW_190_0300) which is in an SAC.
				Aquatic Species	Yes	Potential for concrete material from construction works or spill events to enter the waterbodies and negatively affect the aquatic species.
				Habitats	Yes	Potential for concrete material from construction works or spill events to enter the waterbodies, particularly during periods of heavy rainfall and negatively affect the habitats.
Operational	Foul water discharges during operation	Surface Water	Finnihy (IE_SW_21F010 510) Inner Kenmare River (IE_SW_190_03 00)	Water Quality	Yes	The foul water treated at the existing municipal secondary treatment plant (D0184-Kenmare) will be discharged to the Finnihy River and Inner Kenmare River potentially affecting the water quality.
				Hydromorphology	No	There is no impact from foul water to hydromorphology.
				Protected Areas	Yes	The foul water treated at the existing municipal secondary treatment plant (D0184-Kenmare) will be discharged to the

Phase	Activity	Water Resource	Waterbody Name and ID Number	Receptors	Scoped for Impact Assessment	Rationale /Justification
						Finnihy River and then to the Inner Kenmare River, which is in an SAC.
				Aquatic Species	Yes	The foul water treated at the secondary treatment plant (D0184-Kenmare) will be discharged to the Finnihy River and Inner Kenmare River potentially affecting the aquatic species.
				Habitats	Yes	The foul water treated at the secondary treatment plant (D0184-Kenmare) will be discharged to the Finnihy River and Inner Kenmare River potentially affecting the habitats.
Operational	Storm water discharge	Surface Water	Lissaniska 21 (IE_SW_21F010 510)	Water Quality	Yes	Potential for increased runoff rate into the waterbody.
			Finnihy (IE_SW_21F010 510)	Hydromorphology	No	The works and activities for the Proposed Development will not alter the Hydromorphology of the surface water body.
			Inner Kenmare River (IE_SW_190_03 00)	Protected Areas	Yes	Potential for increased runoff rate to enter the Protected Area Inner Kenmare River (EU code: IE_SW_190_0300) which is in an SAC.
				Aquatic Species	Yes	Potential for increased runoff rate to enter the waterbodies and negatively affect the aquatic species.
				Habitats	Yes	Potential for increased runoff rate to enter the waterbodies and negatively affect the habitats.

6.3 Stage Three: Impact Assessment

The purpose of a Stage 3 impact assessment is to determine whether the Proposed Development and its activities would inhibit the identified waterbodies from achieving 'Good' status as outlined in the WFD. This can be due to deterioration of the current ecological and/or chemical status of the waterbodies or impacts on water quality and the identified water dependent species and habitats that are present in the relevant waterbodies.

The assessment draws on the relevant information concerning the design and implementation proposals for the Proposed Development and the WFD baseline data from the data collation stage.

The results of the impact assessment exercise are set out in **Table 6-4**.

Table 6-4: Impact Assessment Exercise

Phase	Activity	Water Resource	Waterbody Name and ID Number	Receptors	Will activity hinder reaching or maintaining 'Good' status?	Rationale /Justification
Construction	In Stream Works for the Installation of Headwall Outfall	Surface Water	Lissaniska 21 (IE_SW_21F010510)	Water Quality	No	In-stream works will be undertaken in accordance with mitigation measures to minimise potential impacts on water quality, hydromorphology, protected areas, aquatic species, and habitats. The use of a precast concrete headwall will avoid the need for concrete pouring adjacent to the watercourse. Given the small-scale and localised nature of the works, it is unlikely that significant effects on channel morphology, flow regime or sediment transport are anticipated.
			Finnihy (IE_SW_21F010510)	Hydromorphology	No	
				Protected Areas	No	
				Aquatic Species	No	
			Inner Kenmare River (IE_SW_190_0300)	Habitats	No	
Construction	Site clearing and excavation	Groundwater	Kenmare (IE_SW_G_040)	Water Quality	No	Any groundwater seepage flowing out of site clearing and excavation works will be directed to the receiving drainage system through the use of SUDs. No works will take place during adverse weather conditions to minimise potential run-off of excavated materials. Best practice guidelines will also be followed during the site clearing and excavation to prevent impact on water quality and Protected Areas.
				Protected Areas	No	
		Surface Water	Lissaniska 21 (IE_SW_21F010510)	Water Quality	No	No works will take place during adverse weather conditions to minimise potential run-off from excavated materials. Silt traps on existing site drainage system to prevent interaction with
				Protected Areas	No	
				Aquatic Species	No	

Phase	Activity	Water Resource	Waterbody Name and ID Number	Receptors	Will activity hinder reaching or maintaining 'Good' status?	Rationale /Justification
			Finnihy (IE_SW_21F010510) Inner Kenmare River (IE_SW_190_0300)	Habitats	No	waterbodies will be used. Best practice guidelines will also be followed during the site clearing and excavation to prevent impacts on water quality, protected areas such as the Inner Kenmare River which is in an SAC, aquatic species and habitats.
Construction	Concrete Pouring	Groundwater	Kenmare (IE_SW_G_040)	Water Quality	No	Concrete pouring will be monitored and follow best practice guidelines to reduce the risk of impacts to water quality and Protected Areas in this case designation under Article 7 of the WFD for Drinking Water Abstraction. Works will also not take place in adverse weather conditions, reducing the risk of leakage or spill into the GWB.
				Protected Areas	No	
		Surface Water	Lissaniska 21 (IE_SW_21F010510) Finnihy (IE_SW_21F010510) Inner Kenmare River (IE_SW_190_0300)	Water Quality	No	Concrete pouring will be monitored and follow best practice guidelines to reduce the risk of impacts to the water quality, protected areas in this case Kenmare River which is an SAC, aquatic species and habitats. Works will also not take place in adverse weather conditions, reducing the risk to water quality.
				Protected Areas	No	
				Aquatic Species	No	
Construction	Use of fuels, oils and	Groundwater	Kenmare (IE_SW_G_040)	Habitats	No	
				Water Quality	No	
				Protected Areas	No	Fuels and oils will be stored in bunded areas. Fuelling will only occur in a designated fuelling area to reduce the potential for spills. Spill kits will be available around the site and will be made known to personnel during induction. Emergency procedures will also be

Phase	Activity	Water Resource	Waterbody Name and ID Number	Receptors	Will activity hinder reaching or maintaining 'Good' status?	Rationale /Justification
	concrete on site					in place in the event of a spill to minimise impact on water quality and protected areas which in this case is Article 7 Designated Drinking Water Abstraction Area.
		Surface water	Lissaniska 21 (IE_SW_21F010510) Finnihy (IE_SW_21F010510) Inner Kenmare River (IE_SW_190_0300)	Water Quality	No	Fuels and oils will be stored in bunded areas. Fuelling will only occur in a designated fuelling area to reduce the potential for spills. Spill kits will be available around the site and will be made known to personnel during induction. Emergency procedures will also be in place in the event of a spill to minimise impact to water quality, protected area (Inner Kenmare River which is within an SAC), aquatic species and habitats. This will maintain the 'Good' status of the surface waterbodies.
				Protected Areas	No	
				Aquatic Species	No	
				Habitats	No	
Operational	Foul water discharges	Surface Water	Finnihy (IE_SW_21F010510) Inner Kenmare River (IE_SW_190_0300)	Water Quality	No	Foul water from the site will only be discharged to the Uisce Éireann (UÉ) network under the appropriate consents from UÉ and within the capacity of the Kenmare WWTP. After treatment, the overall volume contributed would not be significant and would not preclude the surface waterbody from achieving a 'Good' status.
				Protected Areas	No	
				Aquatic Species	No	
				Habitats	No	

Phase	Activity	Water Resource	Waterbody Name and ID Number	Receptors	Will activity hinder reaching or maintaining 'Good' status?	Rationale /Justification
Operational	Stormwater discharge	Surface Water	Lissaniska 21 (IE_SW_21F010510)	Water Quality	No	Appropriate drainage design in the form of SuDS will prevent any potential impact to the receiving water quality of downstream waterbodies, protected areas, aquatic species and habitats, specifically this will include attenuation tanks. This would not inhibit the identified waterbodies from achieving 'Good' status as outlined in the WFD. This will eliminate any potential impact on the protected areas, aquatic species and habitats.
			Finnihy (IE_SW_21F010510)	Protected Areas	No	
			Inner Kenmare River	Aquatic Species	No	
			(IE_SW_190_0300)	Habitats	No	

7. Conclusion

This WFD compliance assessment has been undertaken for the Proposed Large Residential Development (LRD) at Killowen, Kenmare, Co. Kerry.

The key focus of the assessment was to ensure that the construction and operation of the Proposed Development does not result in a deterioration in the current WFD status of the waterbodies within the WFD study area, and also to ensure that the Proposed Development does not compromise the achievement of the WFD objectives for the improvement in the overall status of these waterbodies. The assessment also considers the protected areas linked to the waterbodies in question and ensures that the protected area objectives are also unaffected.

The scoping stage of the WFD compliance assessment has concluded that there are a number of components and activities associated with the Proposed Development that represent a risk to the WFD status and objectives and therefore were scoped into the assessment. The relevant quality elements contributing to the overall status were considered and how each potential impact could affect these.

With the implementation of the mitigation measures outlined above in the rationale table, there is no risk of any significant deterioration or change to the existing WFD status of waterbodies predicted within the surrounding area of the Proposed Development. Therefore, the Proposed Development will not compromise the objectives of attaining 'good' surface water status in the WFD.

8. WFD Compliance Summary Statement

WFD status for the surface water bodies and groundwater bodies hydraulically linked to the Proposed Large Residential Development at Killowen, Kenmare, Co. Kerry are defined in Section 5 of this WFD Assessment Report. Relevant Surface Water bodies are named the Lissaniska 21 and Finnihy. The relevant WFD 'Transitional Waterbody' is the Inner Kenmare River. The relevant Groundwater Body is the Kenmare Groundwater Body.

This assessment has considered the potential for construction and operational phase activities to affect surface Waterbodies' and Transitional Waterbody's quality, hydromorphology, protected areas, aquatic species, habitats and the relevant Groundwater Body's chemical and quantitative status.

Taking into consideration the embedded design measures, the proposed SuDS-based drainage strategy, attenuation and flow control measures, petrol interceptor, controlled discharge arrangements, foul water connection to the public sewer network and the mitigation measures identified for construction activities, the Proposed Development is unlikely to compromise progress towards achieving the WFD's and associated Irish Regulations Statutory Objective of attaining "at least" Good ecological, chemical and quantitative status.

This assessment concludes that the proposed development will not cause a deterioration in the overall status of the Surface Water Bodies, Transitional Waterbody or Groundwater Body associated with the development site.

Overall, the Proposed Development will not compromise the objectives of the WFD for the hydraulically connected Rivers, Transitional or Groundwater Bodies considered and assessed.

The Proposed Large Residential Development at Killowen, Kenmare, Co. Kerry:

- *Will not cause a deterioration in the status of the surface water bodies and groundwater body assessed;*

- *Will not jeopardise the objectives to achieve or maintain “at least” ‘Good’ surface water or groundwater status;*
- *Does not jeopardise the attainment of “at least” ‘Good’ surface water or groundwater chemical status;*
- *Does not jeopardise the attainment of “at least” ‘Good’ groundwater quantitative status;*
- *Does not permanently exclude or compromise the achievement of the objectives of the WFD in other waterbodies within the same river basin district;*
- *Is compliant with the requirements of the Water Framework Directive (2000/60/EC), subject to implementation of the design and mitigation measures set out in this assessment and supporting planning documentation; and*
- *Is consistent with other Community Environmental Legislation including the EIA Directive (2014/52/EU), the Habitats Directive (92/43/EEC) and the Birds Directive (2009/147/EC).*

References

CIRIA (2001). Control of Water Pollution from Construction Sites: Guidance for Consultants and Contractors.

River Basin Management Plan 2022-2027; Government of Ireland Water Action Plan 2024 A River Basin Management Plan for Ireland. Available at: <https://assets.gov.ie/static/documents/water-action-plan-2024.pdf>

Environmental Protection Agency (2023). EPA-WFD Monitoring Programme 2022-2027. Available at: https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/EPA_WFD_MonitoringProgramme_2022_2027.pdf. Accessed February 2026

Environmental protection Agency (2024). Bathing Water Quality in Ireland, 2023. Available at <https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/bathing-water-quality-inirelandin-2023.php>.

EPA (2024) HA21 Dunmanus-Bantry-Kenmare Catchment Summary WFD Cycle 3. Available at https://www.catchments.ie/data/#/catchment/21?_k=ns8fd2.

IEMA (2016). Environmental Impact Assessment Guide to: Delivering Quality Development. Available at: <https://www.iema.net/download-document/328273>.

Inland Fisheries Ireland (2016). Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters. Available at: <https://www.fisheriesireland.ie/sites/default/files/migrated/docman/2016/Guidelines%20Report%202016.pdf>

Planning Inspectorate (UK), (2017). Planning Inspectorate. Advice Note 18: The Water Framework Directive. Available at: <https://www.gov.uk/government/publications/nationally-significant-infrastructureprojects-advicenote-eighteen-the-water-framework-directive>