



Draft Wicklow Rathnew Draft LAP Amendment Stage Submission - Report

Who are you:	Private Individual
Name:	Multimetals Recycling Ltd / Sur Le Mer Ltd
Reference:	DWTRLAP-151247
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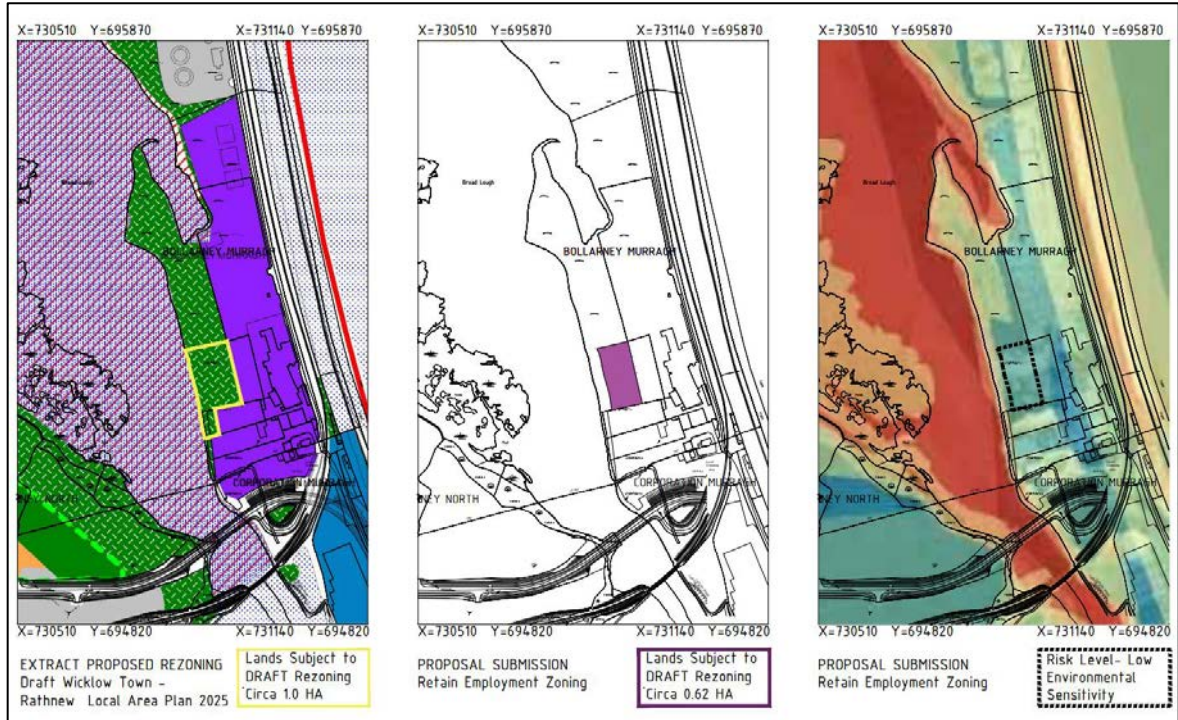
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Sur Le Mer Response to Wicklow Town-Rathnew LAP 2025 v2.00.pdf, 0.59MB



Environmental Efficiency

Client: Sur Le Mer Ltd.
Location: Bollarney, The Murrough, Co. Wicklow
Title: Submission to Retain Land as 'E1 – Employment' Zoning
Date: 10th March 2025



This statement has been prepared by Environmental Efficiency Consultants on behalf of Sur Le Mer Ltd. in response to the draft Wicklow Town–Rathnew Local Area Plan (LAP) 2025, specifically addressing the proposed redesignation of our client, Sur Le Mer Ltd.’s lands, from ‘E1 – Enterprise and Employment’ to ‘OS2 – Natural Areas.’

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Multimetals Recycling Ltd., operating in Bollarney, Murrough, Co. Wicklow, is a Waste Metal Recycling Facility specializing in the recovery and recycling of scrap metal. Sur Le Mer Ltd. serves as the parent company and landowner of both Multimetals Recycling Ltd. and Low Budget Skips T/A The Murrough Eco Park. The latter is an emerging Waste Management Facility facilitating the acceptance, storage, sorting, and transfer of various waste types, including skip waste, construction and demolition debris, green waste, mixed dry recyclables, and public recycling services. The Murrough Eco Park is situated adjacent to Multimetals Recycling Ltd., forming an integrated waste management hub.

It is understood that Wicklow County Council intends to rezone a section of the lands encompassing both the Multimetals Recycling Ltd. facility and The Murrough Eco Park, amounting to approximately 1.5 hectares. A council vote took place to determine the rezoning of lands in the Murrough area. It was initially intended that all corporation lands would be included in this process and that the vote would decide on the rezoning of all Murrough lands collectively. However, this was not the case, and our client was excluded from the vote, resulting in their land being proposed for re-designation as 'OS2 – Natural Areas.

We respectfully request that the Council reconsider this proposed rezoning for the following reasons:

The Strategic Environmental Assessment (SEA) conducted for the Wicklow Town–Rathnew LAP 2025 evaluates the environmental impact of the plan's implementation. Figure 1.1 of the SEA identifies areas of environmental sensitivity, directing incompatible developments away from these locations. As detailed in Section 4.14, environmental sensitivities were mapped and analysed to identify areas where multiple sensitivities overlap. While areas of high sensitivity require stringent environmental safeguards, the presence of environmental

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considerations alone does not preclude development. Instead, it underscores the necessity for strict adherence to mitigation measures to ensure sustainable development.

The lands in question are categorised as having the lowest level of environmental sensitivity. This classification suggests that continued employment use on this site is unlikely to conflict with environmental objectives. The SEA highlights The Murrough Wetlands SAC and The Murrough SPA as the most environmentally sensitive areas within the plan, both of which lie outside the area proposed for retention as E1-Employment.

Furthermore, Table 7.3 in Section 7.3.1 of the SEA states that promoting development on land with relatively low environmental sensitivity and access to existing infrastructure and services helps prevent the need for development in more sensitive, less well-served areas. This, in turn, reduces the risk of significant adverse environmental effects when mitigation measures are not in place. In this case, the 1.5-acre site that our client seeks to retain for employment use is essential for the future expansion of their business, as well as for ongoing operations and storage. Despite the site's classification as having low environmental sensitivity, our client remains committed to ensuring their activities align with environmental protection objectives.

Additionally, the subject lands lie outside the boundaries of any Special Area of Conservation (SAC), Special Protection Area (SPA), or proposed Natural Heritage Area (pNHA), and are unlikely to contain Annex I habitats. This further indicates a lack of significant ecological constraints. As a designated brownfield site, the land is well-suited for continued commercial activity. Furthermore, as noted in the SEA, prioritising the development of brownfield sites over greenfield areas helps mitigate the environmental impacts typically associated with greenfield development.

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The facility was subjected to an Environmental Impact Assessment (EIA) Screening, Natura Impact Assessment, and an Appropriate Assessment Screening while our client was seeking planning permission for the development.

An Appropriate Assessment Screening was completed for the development in 2019. The aim of the assessment is to determine the likelihood of significant impacts, based on best scientific knowledge, of any plans or projects on Natura 2000 sites. The screening stage determines whether a plan or project, either alone or in combination with other plans and projects, is likely to have significant effects on a Natura 2000 site, in view of its conservation objectives. Of the eight Special Areas of Conservation and two Special Protection Areas within a 15km radius of the proposed development, four were identified as being at risk from the proposed development and required Stage Two of the Appropriate Assessment process known as a Natura Impact Statement.

The Natura Impact Statement identified the relevant Natura 2000 sites, including The Murrough Wetlands SAC, The Wicklow Reef SAC, The Wicklow Mountains SAC, and The Murrough SPA. The qualifying interests and conservation objectives for each site were reviewed, and a comprehensive assessment was carried out to identify potential impacts and propose appropriate mitigation measures where necessary. The assessment evaluated both the direct and indirect impacts of the development during the construction and operational phases, considering its effects both in isolation and in combination with other plans and projects, on the integrity and qualifying interests of the Natura 2000 sites. The report concluded that where potential negative impacts were identified, the implementation of mitigation and avoidance measures effectively reduced the likelihood of any significant adverse effects to negligible levels. In cases where no adverse impacts were anticipated, the potential effects were deemed not significant. Overall, the report determined that, with the

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application of the proposed mitigation measures, the development would not result in any significant adverse impacts on Natura 2000 sites.

The objective of the EIA Screening Report was to identify and assess any potential for environmental impact that would arise from the proposed development and determine whether an EIA would be required for the development. In 2019, as part of the planning permission process for the proposed development, the facility underwent an Environmental Impact Assessment (EIA) Screening, a Natura Impact Assessment, and an Appropriate Assessment Screening. The purpose of the EIA Screening Report was to assess any potential environmental impacts associated with the development and determine whether a full EIA would be required. The report concluded that the development would not adversely affect biodiversity, considering its nature, scale, and location within a previously developed site of low ecological value and environmental sensitivity. It further stated that the development would not negatively impact water quality or groundwater resources. Additionally, it confirmed that the project would not result in habitat loss or fragmentation. The facility was also deemed to be in keeping with the surrounding industrial area, with no significant impact on the wider landscape. Given the site's low environmental sensitivity and its alignment with local zoning, the report determined that a full EIA was not required for the development.

An Addendum Inspector's Report was produced by An Bord Pleanála in review of the EIA Screening Assessment and the accompanying Appropriate Assessment and Natura Impact Statement. The conclusions of the planning inspectors report stated that on the basis of the information that was submitted by the applicant, the reports demonstrated that with the implementation of mitigation measures, the proposed development, individually or in combination with other plans and projects would not adversely affect the integrity of

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Murrough Wetlands SAC (Site Code 002249), the Wicklow Reef SAC (Site Code 002274), the Wicklow Mountains SAC (Site Code 002122) and the Murrough Wetlands SPA (Site Code 004186) or any other such designated European, in view of their Conservation Objectives when mitigation measures were implemented.

The findings of these reports demonstrate that the land our client seeks to retain as 'E1 – Employment' is of low environmental sensitivity with no significant ecological value. Our client has operated on the lands in question since 2020 where the land has previously been prescribed as 'E1 – Employment' and have operated in a manner which does not compromise the ecological integrity of the surrounding SAC's and SPA's by adhering to the environmental conditions of their licence agreement. The retention of this land is essential for their daily operations, and its rezoning to 'OS2 – Natural Areas' would have a detrimental impact on their business, which plays a crucial role in servicing Wicklow Town and facilitating proper waste management.

We respectfully urge Wicklow County Council to consider this request to ensure both ecological and economical needs are met.

Rebecca Stokes

BSc (Honours) in Applied Freshwater and Marine Biology

MSc. Conservation Behaviour

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