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Attachment 4.5 - Statement of Consistency with Water Framework
Directive (WFD)
29/07/2026



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1 Statement of competence

The information provided in this attachment has been prepared by Dr Rhian Llewellyn and Zak Bursey.

Rhian is a Principal Environmental Consultant at WSP Ireland Consulting Ltd ('WSP') with 10+ years' experience in the environmental sector. She holds a Master of Geology degree and PhD in the Earth Sciences (from University of Leicester and University of Portsmouth, UK, respectively). She is a Practitioner affiliation level within ISEP (previously known as IEMA) and she holds a certificate in environmental management (IEMA) and an advanced diploma in planning and environmental law (King's Inns, Dublin).

Zak is a Graduate Environmental Consultant with 2+ years of experience in the environmental industry. He has an undergraduate degree in Environmental Science (from Trinity College Dublin).

2 Water Framework Directive

The EPA classifies the status and the risk of not achieving good water quality status for all waterbodies in Ireland under the Water Framework Directive (WFD) 2000/60/EC. The following data sources have been considered in the preparation of this attachment:

- GeoPortal available at <https://gis.epa.ie/EPAMaps/> (accessed July 2026).
- Liffey and Dublin Bay Catchment available at https://www.catchments.ie/data/#/catchment/09?_k=3j9hag (accessed July 2026).
- EPA (2024) Cycle 3 HA 09 Liffey and Dublin Bay Catchment Report, May 2024 available at <https://catchments.ie/wp-content/files/catchmentassessments/09%20Liffey%20and%20Dublin%20Bay%20Catchment%20Summary%20WFD%20Cycle%203.pdf>.
- EPA data page for Liffey Estuary Upper available at https://www.catchments.ie/data/#/waterbody/IE_EA_090_0400?_k=tdefpl (accessed July 2026).
- EPA data page for Liffey Estuary Lower available at https://www.catchments.ie/data/#/waterbody/IE_EA_090_0300?_k=wdp9ms (accessed July 2026).

The proposed site investigation works are entirely located within the transitional water body designated as the 'Liffey Estuary Upper' (waterbody code IE_EA_090_0400). This waterbody is located within the Liffey and Dublin Bay Catchment. The Liffey Estuary Upper waterbody is considered to have 'moderate' water quality over the WFD status period 2019-2024. The waterbody has a risk classification identified as under 'Review' (WFD Status 2016-



2021)¹. The EPA identifies the waterbody as 'Nutrient Sensitive Areas' under the Protected Area Categories.

There are three EPA monitoring locations/stations within close proximity 'LIFFEY – Butt Bridge (station ID - RS09L013100), LIFFEY – Talbot Bridge (station ID - RS09L013200) and DB020-Liffey at Matt Talbot Bridge (station ID - TW0700105DB1002). Monitoring records for the 2016-2021 period indicate that the ecological status or potential value was 'Good' and the supporting Chemistry Conditions value 'Good'.

The receiving waterbody for the Liffey Estuary Upper is the transitional waterbody 'Liffey Estuary Lower' (waterbody code IE_EA_090_0300). The receiving waterbody is located downstream of Talbot Memorial Bridge and to the east of the proposed site investigation area. The EPA recognise the Liffey Estuary Lower as a heavily modified waterbody. The WFD status of the waterbody over the 2019-2024 period is 'moderate' and the waterbody is considered to be 'at risk'. The EPA identifies that urban wastewater is a significant pressure on, and nutrient pollution is a significant issue on, the Liffey Estuary Lower waterbody.

Under the Protected Area Categories, the EPA identifies the waterbody as 'SAC: Special Area of Conservation, Natura 2000 (water dependent habitats and species)', 'SPA: Special Area of Protection, Natura 2000 (water dependent habitat and species)', and 'Nutrient Sensitive Areas'.

The proposed site investigation works are located between areas designated as Dublin groundwater body (IE_EA_G_008). This groundwater body is classified as having Good status for the period 2019-2024. The waterbody has a risk classification identified as under review (WFD Status 2016-2021).

Under the Protected Area Categories, the EPA identifies the waterbody as a 'Drinking Water Protection Area' and 'SAC: Special Area of Conservation, Natura 2000 (water dependent habitats and species)'.

There are no other relevant drinking water protection areas within close proximity to the proposed works. The closest drinking water protection area to the works (excluding groundwater) is the river drinking water area named as the Dodder 020 and is 12.6 km south west of the proposed works. The closest source protection area is named DUNBOYNE PWS and is located 17 km northeast. Given the distance to these areas, and the nature of the proposed site investigation works, they are considered not likely to be significantly affected by the works.

¹ Note that the EPA's WFD 2016-2021 data is the most recently published publicly available data at the time of writing.



A combined Stage 1 Appropriate Assessment Screening Report and Natura Impact Statement has been prepared in support of this application and that report is provided in Attachment 4.3. The assessment therein finds that the proposed site investigation works will not give rise to likely significant effects on Natura 2000 sites.

The RAMS prepared by the Contractor will set out sediment control and waste management measures. It is anticipated that given the scale, nature and short-term duration of the proposed site investigation and the application of control measures, the works will not contribute to nutrient loading within the River Liffey Upper waterbody or downstream.

Potential impacts to drinking water protection areas, specifically the groundwater body, will be mitigated by implementing established best practice drilling methodology throughout the works (see Attachment 3.1 response for details), ensuring no potential source pathways are opened between systems.

Given the temporary duration and nature of the works, and the application of the operational controls set out in the Attachment 3.1 response, it is considered the proposed site investigation works will not adversely impact waterbodies classified under the Water Framework Directive. Nor will they affect the prospect of the waterbody achieving good ecological and chemical status. Therefore, the proposed site investigation works are considered to be consistent with the objectives of the Water Framework Directive.



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