Natura Impact Statement :

Proposed Replacement Dwelling. Cloontyprocklis, Grange, Co. Sligo

**Report by:** 

**Shaun Wolfe-Murphy** 

WM Associates 11 Main Street Killinchy Co. Down BT23 6PN

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For:

Studio PARK Blick Shared Studios 46 Hill St. Belfast BT1 2LB

Torsa 7977733 🖳 www.studioparkarchitects.com

Date:

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26/10/2020 version updated to include the proposed RBC micro-treatment works and on-site drainage field.

## Natura Impact Statement : Proposed Replacement Dwelling. Cloontyprocklis, Grange, Co. Sligo

# Background:

Sligo County Council have advised that a planning application proposing the replacement of an existing dwelling at Cloontyprocklis on the L3203 on around 1.25 km south-west of Grange in County Sligo will require a Habitat Regulations Assessment in compliance with European Commission Habitats Directive (92/43/EEC) to assess the potential for impacts upon Natura 2000 sites, namely Streedagh Point Dunes Special Area of Conservation (SAC code 001680).

WM Associates have been duly appointed to undertake the assessment.

The aims of this report are:

- 1. Identification of the designation features that the proposal must be screened against.
- 2. Identification of potential risks to the specified feature and of the standard environmental precautions that will be adopted irrespective of the threat to N2K designations.
- 3. Compile the HRA statement.

## The HRA Process:

Articles 6(3) and 6(4) of the 'Habitats Directive' (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora) set out the decision-making tests for plans and projects likely to affect an EPS. Article 6(3) establishes the requirement for AA:

*Stage 1* of the prescribed process is an Appropriate Assessment Screening to investigate potential effects of the works on the designation features and conservation objectives of the European Protected Site. Effects on all designation features will be considered; the features of concern may be summarised as terrestrial, estuarine, littoral and intertidal habitats and the waterfowl that they sustain.

Depending on the outcome of the Screening exercise, and following the precautionary principle, if significant effects are likely, uncertain or unknown, a further stage of Appropriate Assessment (*Stage 2*) will be required that will take account of any mitigation measures that have been identified arising from the screening process. A Natura Impact Statement (NIS) will be produced, which will record and analyse potential effects on the conservation objectives of the EPS. Where no significant effects will be anticipated, works will be carried out in accordance with the mitigation measures produced in the AA.

Where significant adverse impacts of a scheme are anticipated, alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the European site are assessed (*Stage 3*).

*Stage 4* of the process is initiated where no alternative solutions exist and where adverse impacts remain. An assessment of compensatory measures is carried out where, in the light of an assessment of imperative reasons of overriding public interest (IROPI), it is deemed that the project or plan should proceed.

#### Mitigation works:

Currently the Stage 1 Appropriate Assessment must be subject to a recent CJEU ruling (C-323/17 of 12 April 2018 People Over Wind and Peter Sweetman v Coillte Teoranta), which determined that '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'.

Thus a proposed project can only be screened out at Stage 1 if there will demonstrably be no impacts were the project to go ahead in the absence of mitigation works.

### Survey/Staff details:

The HRA has been compiled as a desk study by Shaun Wolfe-Murphy BSc., Dip. EIA Mgmt., MCIEEM in collaboration with Studio PARK, the project architects and with reference to photographs taken by the landowner under Shaun's instruction.

**Statement of Authority**: Shaun has 30 years' experience as a professional botanist, including working for the NIEA habitat survey and designations team, the England Field unit of the (then) NCC and for the survey and designations unit of Dúchas in the government conservation agency of Republic of Ireland. During the time spent working for these agencies much emphasis was on the survey and ecological evaluation of sites.

Since establishing WM Associates in 1994 as an ecological consultancy, he has routinely compiled ecological impact assessments and Habitat Regulations Assessment for a wide variety of development projects in both urban and rural habitats.

**Statement of Objectivity**: The data have been collected and presented impartially, as required by the CIEEM code of professional conduct. Payment or other favour is not dependent upon any particular planning outcome, and there is no other vested or personal interest in any particular outcome.

# Site Description:

### Setting:

The proposed development site is represented by the curtilage of an existing cottage facing onto the L3203 and beside a small watercourse that runs for some 65m into the Grange River.

The site elevation is <5m above OS datum. The point at which the small watercourse joins the Grange River is around 175m before it discharges over the mudflats at Rinroe, within a long coastal inlet defined by Back Strand and Connor's Island which form a 'tombolo', a long shingle spit overlain with sand dunes running parallel to the coast. The entrance to the inlet is further restricted by Dernish Island.

Thus the immediate shore over which the Grange River discharges is sheltered from the Atlantic which allows the mudflats to accumulate, and in places, for 'saltmarshes' to form.

Saltmarshes are vegetated mud flats that are inundated by seawater at high tides – Mudflats and saltmarshes are very environmentally demanding habitats in which only a very specialised flora and fauna can survive.



# Natura 2000 Designations:

Environment, Heritage and Local Government (2010) advises that for the assessment of Plans, potential for impacts upon any Natura 2000 sites within a distance of 15km (the 'likely zone of impact') should be assessed, but for projects, the distance could be much less and that this must be evaluated on a case-by-case basis with reference to the nature, size and location of the project, the sensitivity of the ecological receptors, and the potential for in combination effects'



Natura 2000 sites within 15 km of the pending proposal site

#### **Background information: Selection Features and Conservation Objectives:**

Natura 2000 sites are a part of an international network of sites designated to protect species and habitats identified as being at risk in Europe. They are therefore designated for specified species or habitats which are termed the qualifying Features.

Article 2 of The Habitats Directive outlines that habitats and species qualifying Features protected by the Directive must be maintained in 'favourable conservation status' within their range.

The conservation status of a Habitat Feature is regarded as 'favourable' when:

The natural range, and area it covers within that range, is 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.

Favourable conservation status of a Species Feature 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.

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

The N2K sites that are inland from the proposed replacement dwelling at Cloontyprocklis have no functional connectivity and are not considered to be at risk.

Of the coastal SACs Streedagh Point Dunes SAC 170 is clearly at risk. The other SACs are functionally connected via marine open water, but given the scale of the proposal are ruled out due to dilution rending any marine inputs insignificant.

The coastal SPAs are designated for birds. The Feature birds that use the marine SPAs are protected when they are using other sites beyond the designation.

It is not known whether the coastal inlet behind Back Strand is used by significant numbers of birds protected within the marine SPAs, so they cannot be ruled out (the precautionary principle is applicable).

#### **Streedagh Point Dunes SAC Selection Features:**

Narrow-mouthed Whorl Snail Vertigo angustior Mudflats and sandflats not covered by seawater at low tide Perennial vegetation of stony banks Atlantic salt meadows (Glauco-Puccinellietalia maritimae) Mediterranean salt meadows (Juncetalia maritimi) Shifting dunes along the shoreline with Ammophila arenaria (white dunes) Fixed coastal dunes with herbaceous vegetation (grey dunes)

#### **Inishmurray SPA Selection Features:**

Shag Phalacrocorax aristotelis (breeding) Herring Gull Larus argentatus (breeding) Arctic Tern Sterna paradisaea (breeding)

Barnacle Goose Branta leucopsis (over wintering)

#### **Ballintemple and Ballygilgan SPA Selection Feature:**

Barnacle Goose Branta leucopsis (over wintering)

#### Ardboline Island and Horse Island SPA Selection Features

Cormorant Phalacrocorax carbo (breeding)

Barnacle Goose Branta leucopsis (over wintering)

#### **Drumcliff Bay SPA Selection Features**

Sanderling Calidris alba (over wintering) Bar-tailed Godwit Limosa lapponica (over wintering) Wetlands (bird assemblage)

#### **Cummeen Strand SPA Selection Features**

Pale-bellied Brent Goose Branta bernicla hrota (over wintering) Oystercatcher Haematopus ostralegus (over wintering) Redshank Tringa totanus (over wintering) Wetland (bird assemblage)

# Connectivity between the proposal site and the N2K sites

The input pathway from the proposal site to the Streedagh Point Dunes SAC is via the stream adjacent to the site, and then via Strand River:



Proposal site (in yellow)



View to the stream from the proposed construction site



Dense unmanaged vegetation at the stream edge



The stream leading to the Grange River

The Selection Features at risk are those that are submerged at some point in the tidal cycle.

Mudflats and sandflats not covered by seawater at low tide, Atlantic salt meadows (Glauco-Puccinellietalia maritimae) and Mediterranean salt meadows (Juncetalia maritimi).

McCorry and Ryle (2009) included the site in their inventory of saltmarshes. They identified and mapped the Selection Features Atlantic salt meadows (Glauco-Puccinellietalia maritimae) and Mediterranean salt meadows (Juncetalia maritimi):



McCorry and Ryle's saltmarsh distribution map in relation to the application site



Saltmarsh at the Grange River outfall



Atlantic Salt Meadow at the Grange River outfall

#### Potential for impacts during the build phase

Mudflat and saltmarsh fauna are sensitive to various pollutants that may be in use on a demolition site or a building site, including, but not limited to diesel probably stored on site for the plant. There is a risk of a large spill from an unmitigated site that could wash into the adjacent stream and thus impact upon mudflats and saltmarshes to the detriment of the N2K site.

Inputs of soil in the amounts that are likely to be generated are not a risk – indeed both subhabitats rely upon external sediment inputs.

McCorry and Ryle also report that the sand flats attract moderate numbers of wintering waders and wildfowl in winter. These could include species protected under the SPA designations.

#### Potential for impacts during the operational phase

Although this is already a high nutrient habitat, over-enrichment as a result of sewage effluent could impact upon both saltmarsh and mudflat habitats, particularly in combination with other inputs directly into the inlet or into the Grange River, and the likely accumulation during the incoming tide cycle.

#### **Build-phase Mitigation**

During the build phase standard good environmental practice will reduce the risk of inputs into the adjacent stream to negligible:

These practices will include:

Observance of a 10 m buffer along the streamside where there shall be no storage of excavated soil, or any building materials or hazardous substances, no concrete mixing or washout, and in which any required excavation or stripping shall only be undertaken once suitable barriers to soil inputs into the adjacent stream are in place – such as silt-fencing.

That at least a 1 m strip of unmanaged vegetation will be retained at the top of the slope to the stream.

That storage and handling of diesel and other oils will adhere to the following:

Refuelling to be from a bowser with drip tray or tank situated in an appropriately bunded designated refuelling area located on a level surface, and by personnel that have been through the site induction. Fuel bowsers used on the site will have the capability to transfer fuel by pump. During fuel transfers, spill kits will be on hand and absorbent mats will be available to capture minor drips.

Diesel (or other oils) that has collected in a bund, probably mixed with rain water, must be handled and disposed of in accordance with the Waste Management Act 1996, the Waste Management (Amendment) Act 2001 and the Protection of the Environment Act 2003.

Waste segregation area to be established beyond the 10 m buffers, utilising containers of an appropriate design to ensure that no waste can escape.

Sewerage effluent from the site office and welfare facilities will be removed from the site using a vacuum tanker, if no sewer connection is available.

All plant used on site will be kept in good mechanical order with no oil or hydraulic fluid leaks.

There shall be no disposal of waste directly into the adjacent stream or into the storm drain system.

Concrete and cement are very alkaline and can cause serious pollution. The risk of cement entering the ditch or storm drain system in runoff from the construction site will be controlled.

Concrete and cement mixing areas will be sited at least 10m away from the adjacent stream, or any active storm drain grating

The building contractor will be responsible for creating a mechanism to contain any concrete washout, in a container in a designated concrete washout area. Settled cement will be safely disposed of off-site.

Storage of hazardous material to adhere to the following:

Materials storage areas will be set up and managed.

All hazardous chemicals shall be stored within a level works compound.

All hazardous chemicals shall be stored in a designated lockable storage area.

Bunding should be of sufficient capacity to hold 25% of the total of the containers or 10% of the largest container, whichever is greater.

Planning for emergencies:

Appropriate spill kits to be kept on site in strategic locations such as close to refuelling areas, chemical handling areas or waste storage areas.

Staff to be trained in their use deployment of the spill kits.

The appropriate response to accidental spills shall be included in the site inductions.

#### **Design mitigation**

Sewerage output from the replacement dwelling will employ a Package Treatment System (e.g. A 'Klargester' model). This will be a 95% BOD Sewage Treatment specification unit or better. The final effluent *could* be piped directly into the adjacent watercourse without risk of significant impact upon saltmarsh or mudflat habitat, however it will instead be pumped to a percolation area/drainage field that has passed the required percolation tests. This will isolate the stream and the marine inlet from all risk of sewage inputs.

# Stage 1 : HRA Screening

Assessment of significance may be based on a number of factors, as outlined in EC (2001). Criteria that are relevant to the present study include:

- the character and perceived value of the affected environment;
- the magnitude, spatial extent and duration of the anticipated change;
- the resilience of the environment to cope with change; and
- confidence in the accuracy of predictions of change.

An effect is considered significant if an activity seriously disrupts the lifecycle (breeding, feeding, migration or resting behaviour) of an ecologically meaningful proportion of the population of the species.

In summary, any element of a plan or project that has the potential to affect the conservation objectives of a Natura 2000 site, including its structure and function, should be considered significant (EC, 2018).

## Potential impact : Stage 1: Test of Likely Significance

#### Natura 2000 sites at potential risk:

Streedagh Point Dunes SAC Inishmurray SPA Ballintemple and Ballygilgan SPA Ardboline Island and Horse Island SPA Drumcliff Bay SPA Cummeen Strand SPA

#### Description of the redevelopment:

• Size and scale;

Total site area – around 0.25 ha

#### • Land-take;

Existing dwelling house and garden plus coarse grassland.

#### • Distance from Natura 2000 site or key features of the site;

100m from Streedagh Point Dunes SAC, where saltmarsh habitats that are SAC selection features commence immediately.

#### Resource requirements (water abstraction etc);

None that will impact upon the designated N2K sites

#### • Emission (disposal to land, water or air);

No atmospheric emissions other than emissions from works vehicles.

Excavation arisings that cannot be re-used on the site will be removed by a licensed carrier to an authorised disposal site. None will be dumped in ecologically valuable locations.

#### • Excavation requirements;

New build foundations.

#### • Transportation requirements;

Delivery of all materials. This will be easy via the adjacent road.

#### • Duration of construction, operation, de-commissioning etc;

The project start date will be determined by the duration of the process of achieving full planning permission.

# Is the proposal directly connected with or necessary to management of the site for conservation of N2K features?

No

# Describe the individual elements of the project (either alone or in combination with other plans or projects) likely to give rise to impacts on the Natura 2000 site as a result of\*:

#### • Habitat loss;

None – no habitats that are functionally important to the maintenance of the N2K Features are implicated..

#### • Reduction of habitat area;

None – there will be no reduction in the habitat area within the N2K designations.

#### • Disturbance;

No potential for disturbance of feature bird species either on the designation site, or using habitats beyond the designation.

#### • Habitat or species fragmentation;

There will be no fragmentation of any habitats either within or beyond the N2K designations, that could impact upon the N2K Feature species or habitats.

#### • Reduction in species density;

No mechanism to cause reduction in species density has been identified.

#### • Changes in key indicators of conservation value (e.g. water quality, climate change).

None.

Streedagh Point Dunes SAC	Projected impact
Narrow-mouthed Whorl Snail Vertigo angustior	No significant effect – this is a snail of damp dune slacks never inundated by the tide
Mudflats and sandflats not covered by seawater at low tide	At risk without mitigation
Perennial vegetation of stony banks	No significant effect – these stony banks are above the strand line.
Atlantic salt meadows (Glauco-Puccinellietalia maritimae)	At risk without mitigation
Mediterranean salt meadows (Juncetalia maritimi)	At risk without mitigation- inundated by the highest tides.
Shifting dunes along the shoreline with Ammophila arenaria (white dunes)	No significant effect
Fixed coastal dunes with herbaceous vegetation (grey dunes)	No significant effect

Inishmurray SPA	Projected impact
Shag Phalacrocorax aristotelis (breeding)	No significant effect. This bird feeds predominantly in benthic habitats
Herring Gull Larus argentatus (breeding)	At risk without mitigation
Arctic Tern Sterna paradisaea (breeding)	At risk without mitigation
Barnacle Goose Branta leucopsis (over wintering)	No significant effect. Feeding habitats are above the high water mark

Ardboline Island and Horse Island SPA	Projected impact
Cormorant Phalacrocorax carbo (breeding)	No significant effect. This bird feeds predominantly in benthic habitats
Barnacle Goose Branta leucopsis (over wintering)	No significant effect. Feeding habitats are above the high water mark

Drumcliff Bay SPA	Projected impact
Sanderling Calidris alba (over wintering)	Potentially at risk without mitigation.
Bar-tailed Godwit Limosa lapponica (over wintering)	No evidence is offered that there is no interchange between wintering birds using the mudflat off the proposal site and the
Wetlands (bird assemblage)	SPA designated site.

Ballintemple and Ballygilgan SPA	Projected impact
Barnacle Goose Branta leucopsis (over wintering)	No significant effect. Feeding habitats are above the high water mark

Cummeen Strand SPA	Projected impact
Pale-bellied Brent Goose Branta bernicla hrota (over wintering)	
Oystercatcher Haematopus ostralegus (over wintering)	Potentially at risk without mitigation. No evidence is offered that there is no
Redshank Tringa totanus (over wintering)	the mudflat off the proposal site and the SPA designated site.
Wetland (bird assemblage)	

Describe any potential effects on the Natura 2000 site as a whole in terms of: interference with the key relationships that define the structure or function of the site	Effect considered significant/non- significant: Finding of No significant effects Matrix
Potential for catastrophic inputs of deleterious substances from the building site,, for example in the event of a full load from a diesel bowser being transferred to the SAC via the Grange River. Potentially significant but short term impacts	No significant effect with mitigation, otherwise the impact difficult to quantify
Potential for accumulation of high BOD effluent from a poorly functioning septic waste system	Potentially significant in combination with other loading. Potential for development of anoxic sediments.

Provide details of any other projects or plans that together with the project or plan being assessed could (directly or indirectly) affect the site.	Provide details of any likely in- combination effects and quantify their significance -
With mitigation it is not anticipated that the redevelopment will have any impact at all on the Natura 2000 sites.	
Given there will be no impact, then it follows that there will be no contribution to cumulative impacts.	No significant effect with mitigation

Is the potential scale or magnitude of any effect likely to be significant?	
Alone?	Yes⊡ No⊠
In-combination with other projects of plans?	Yes⊡ No⊠

List of Agencies Consulted: Provide contact name and telephone or email address.	None
Above consultee response.	NA

Conclusion: Could the proposal potentially	
have a significant effect on an N2K site if undertaken without mitigation in place?	Yes⊠ No⊡
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#### IT HAS BEEN DETERMINED THAT AVOIDING POTENTIAL SIGNIFICANT IMPACTS UPON STREEDAGH POINT DUNES SAC RELIES UPON MITIGATION WORKS SO THE PROPOSAL CAN'T BE SCREENED OUT.

#### Data collected to carry out the assessment

Who carried out the assessment?	Shaun Wolfe-Murphy
Sources of data	Clients photographs Client's engineering drawings, NPWS website
Level of assessment completed	Stage 1 – Screening

# Stage 2 : Appropriate Assessment

This Appendix is submitted as Stage 2 of the Habitats Regulations Assessment process (Appropriate Assessment) for the potential replacement dwelling.

The Stage 2 – Appropriate Assessment is being undertaken because the Stage 1 Screening stage failed to rule out potential significant effects integrity of the site with respect to the site structure, function and conservation objectives, arising from the proposal upon an N2K (or a proposed/candidate N2K or Ramsar site) either alone or in combination with other projects and plans.

Mitigation measures are proposed to alleviate the potential significant impacts identified in the screening report.

The likely effectiveness of the mitigation measures is assessed so as to enable a clear statement as to whether significant residual impacts or uncertainty would remain.

A: Scope

The HRA Screening failed to rule out potentially significant negative impacts on the mudflats and saltmarshes of the nearby Streedagh Point Dunes SAC, with potential for 'knock on' impacts upon birds that possibly also use SPA designated sites within 15 km.

• Harmful inputs into the Streedagh Point Dunes SAC via the Grange River, and possibly upon Feature birds that use the mudflats be protected by more distant SPA's.

An Appropriate Assessment is required for these potential impacts.

#### A1. Harmful inputs into Streedagh tidal inlet via the Grange River

Site(s) + Features	Streedagh Point Dunes SAC Mudflats and sandflats not covered by seawater at low tide
at risk:	Attantic sait meadows (Giauco-Puccinemetaria martinae)
	Mediterranean sait meadows (Juncetana maritimi)
	Inishmurray SPA
	Herring Gull Larus argentatus (breeding)
	Arctic Tern Sterna paradisaea (breeding)
	Drumcliff Bay SPA
	Sanderling Calidris alba (over wintering)
	Bar-tailed Godwit Limosa lapponica (over wintering)
	Wetlands (bird assemblage)
	Cummeen Strand SPA
	Pale-bellied Brent Goose Branta bernicla hrota (over wintering)
	Oystercatcher Haematopus ostralegus (over wintering)
	Redshank Tringa totanus (over wintering)
	Wetland (bird assemblage)

Development phase at which risks arise:

Construction and subsequent occupation

#### Additional data/evidence required to assess the risk:

None. No attempt has been made, or will be made to determine the spatial pattern or feeding behaviour of the birds using the SPAs within the 15 km radius. It is more economical to adopt the precautionary principal and assume that birds do use the mudflat areas within Streedagh Point Dunes SAC that are vulnerable to impact.

#### B1: Assessment of Mitigation Measures

Detail of mitigation measures included in the proposal:

Measure: Build phase mitigation as detailed above

Measure: Disposal of sewage to main or to a 95% BOD or better package treatment plant

#### How the measures will avoid or reduce the adverse effects on site integrity\*:

The risk of inputs of deleterious material in harmful quantity via the Grange River reduced to negligible

#### How the measures will be implemented and by whom:

By the demolition and building contractors

Can we be confident that the measures will in fact be implemented?:

The prescribed measures can be adopted as planning conditions. Evidence of mitigation (mainly photographs) can be archived

Time-scale, relative to the project when they will be implemented:

Good environmental practice throughout the demolition and rebuilding phases. Safe management of sewage throughout the design life.

Can we be confident in their likely success?:

Yes – risks are low and easily mitigated against.

\* As defined by Case C-258/11, paragraph 48: 'Article 6(3) of the Habitats Directive must be interpreted as meaning that a plan or project not directly connected with or necessary to the management of a site will adversely affect the integrity of that site if it is liable to prevent the lasting preservation of the constitutive characteristics of the site that are connected to the presence of a priority natural habitat whose conservation was the objective justifying the designation of the site'... thus it exclusively relates to the site selection features. (Commission Notice 2018).

C: Assessment of Site Integrity

#### **Overall N2K site Objectives:**

To maintain each feature in favourable condition\*

\* Favourable condition defined in the published Conservation Objectives document as meeting 'the target condition for an interest feature in terms of the abundance, distribution and/or quality of that feature within the site' The target conditions are in turn defined by Common Standards Monitoring (CSM).

Designation Feature at Risk:					
C1 Streedagh Poi	C1 Streedagh Point Dunes SAC : Mudflats and sandflats not covered by seawater at low tide				
Qualifying Feature?	Qualifying Feature? Yes Grade NA				
Feature objectives:					
The permanent habitat area is stable or increasing subject to natural processes Conserve the following community types in a natural condition: Sand with Pygospio elegans and Cerastoderma edule community complex; Mobile sand with Haustorius arenarius and polychaetes community complex					
Condition Assessment:					
338ha overall					
Residual impact reasonably anticipated after mitigation:					
None					

Designation Feature at Risk:						
C2 Streedagh Poin	C2 Streedagh Point Dunes SAC : Atlantic salt meadows (Glauco-Puccinellietalia maritimae)					
Qualifying Feature?	Qualifying Feature?YesGradeNA					
Feature objectives:						
<ul> <li>Area stable or increasing subject to natural processes, including erosion and succession.</li> <li>No decline or change in habitat distribution, subject to natural processes.</li> <li>Maintain natural circulation of sediments and organic matter, without any physical obstructions</li> <li>Maintain creek and pan structure, subject to natural processes, including erosion and succession</li> <li>Maintain natural tidal regime</li> <li>Maintain range of coastal habitats including transitional zones, subject to natural processes including erosion and succession.</li> <li>Maintain structural variation within sward</li> <li>Maintain more than 90% area outside creeks vegetated</li> <li>Maintain range of sub-communities with typical species listed in (McCorry and Ryle, 2009)</li> <li>Spartina anglica prevented from establishing here</li> </ul>						
Condition Assessment:	Condition Assessment:					
12.82ha of habitat Distribution/structure as per McCorry and Ryle Currently no physical barriers to sediment conveyor Natural tidal regime Various levels of cattle grazing intensity leading to diverse structure Locally severe poaching by cattle noted Spartina absent in 2009						
Residual impact reasonably anticipated after mitigation:						
None						

Designation Feature at Risk:					
C3 Streedagh Poi	C3 Streedagh Point Dunes SAC : Mediterranean salt meadows (Juncetalia maritimi)				
Qualifying Feature?	Qualifying Feature?     Yes     Grade     NA				
Feature objectives:					
<ul> <li>Area stable or increasing subject to natural processes, including erosion and succession.</li> <li>No decline or change in habitat distribution, subject to natural processes.</li> <li>Maintain natural circulation of sediments and organic matter, without any physical obstructions</li> <li>Maintain creek and pan structure, subject to natural processes, including erosion and succession</li> <li>Maintain natural tidal regime</li> <li>Maintain range of coastal habitats including transitional zones, subject to natural processes including erosion and succession.</li> <li>Maintain structural variation within sward</li> <li>Maintain more than 90% area outside creeks vegetated</li> <li>Maintain range of sub-communities with typical species listed in (McCorry and Ryle, 2009)</li> </ul>					

Spartina anglica prevented from establishing here	
Condition Assessment:	
12.82ha of habitat	
Distribution/structure as per McCorry and Ryle	
Currently no physical barriers to sediment conveyor	
Natural tidal regime	
Various levels of cattle grazing intensity leading to diverse structure	
Locally severe poaching by cattle noted	
Spartina absent in 2009	
Residual impact reasonably anticipated after mitigation:	

None

Designation Feature at Risk:				
C4 Inishmurray SPA : Herring Gull Larus argentatus (breeding)				
Qualifying Feature?	Yes	Grade	NA	
Feature objectives:				
Herring Gull breeding population is maintaining itself on a long-term basis as a viable component of its natural habitats. The natural range of breeding Herring Gull is neither being reduced nor is likely to be reduced for the foreseeable future. There is, and will probably continue to be, a sufficiently large habitat to maintain the population of breeding Herring Gull on a long-term basis.				
Condition Assessment:				
Not recorded				
Residual impact reasonably anticipated after mitigation:				
None				

Designation Feature at Risk:				
C5 Inishmurray SPA : Arctic Tern Sterna paradisaea (breeding)				
Qualifying Feature?YesGradeNA				
Feature objectives:				
Arctic Tern breeding population is maintaining itself on a long-term basis as a viable component of its natural habitats. The natural range of breeding Arctic Tern is neither being reduced nor is likely to be reduced for the foreseeable future. There is, and will probably continue to be, a sufficiently large habitat to maintain the population of				

breeding Arctic Tern on a long-term basis.

**Condition Assessment:** 

113 pairs

Residual impact reasonably anticipated after mitigation:

None

Designation Feature at Risk:					
C6 Drumcliff Bay SPA : Sanderling Calidris alba (over wintering)					
Qualifying Feature?	nalifying Feature?YesGradeNA				
Feature objectives:					
Long term population trend stable or increasing. No significant decrease in the range, timing or intensity of use of areas by Sanderling, other than that occurring from natural patterns of variation					
Condition Assessment:					
278 birds					
Residual impact reasonably anticipated after mitigation:					
None					

Designation Feature at Risk:					
C7 Drumcliff Bay	C7 Drumcliff Bay SPA : Bar-tailed Godwit Limosa lapponica (over wintering)				
Qualifying Feature?	alifying Feature? Yes Grade NA				
Feature objectives:					
Long term population trend stable or increasing. No significant decrease in the range, timing or intensity of use of areas by Bar-tailed Godwit, other than that occurring from natural patterns of variation					
Condition Assessment:					
172 birds					
Residual impact reasonably anticipated after mitigation:					
None					

Designation Feature at Risk:				
C8 Drumcliff Bay SPA : Wetland (bird assemblage)				
Qualifying Feature?	Yes	Grade	NA	
Feature objectives:				
The permanent area occupied by the wetland habitat should be stable and not significantly less than the area of 1843 hectares, other than that occurring from natural patterns of variation				
Condition Assessment:				
1,843 ha				
Residual impact reasonably anticipated after mitigation:				
None				

Designation Feature at Risk:					
C9 Cummeen Strand SPA : Pale-bellied Brent Goose Branta bernicla hrota (over wintering)					
Qualifying Feature?	Qualifying Feature?YesGradeNA				
Feature objectives:					
Long term population trend stable or increasing. No significant decrease in the range, timing and intensity of use of areas by light-bellied Brent goose, other than that occurring from natural patterns of variation.					
Condition Assessment:					
232 birds					
Residual impact reasonably anticipated after mitigation:					
None					

Designation Feature at Risk:				
C10 Cummeen Strand SPA : Oystercatcher Haematopus ostralegus (over wintering)				
Qualifying Feature?	Yes	Grade	NA	
Feature objectives:				
Long term population trend stable or increasing. No significant decrease in the range, timing and intensity of use of areas by Oystercatcher, other than that occurring from natural patterns of variation.				
Condition Assessment:				

891 birds

Residual impact reasonably anticipated after mitigation:

None

Designation Feature at Risk:				
C11 Cummeen Strand SPA : Redshank Tringa totanus (over wintering)				
Qualifying Feature?	Yes	Grade	NA	
Feature objectives:				
Long term population trend stable or increasing. No significant decrease in the range, timing and intensity of use of areas by Redshank, other than that occurring from natural patterns of variation.				
Condition Assessment:				
501 birds				
Residual impact reasonably anticipated after mitigation:				
None				

Designation Feature at Risk:				
C12 Cummeen Strand SPA : Wetland (bird assemblage)				
Qualifying Feature?	Yes	Grade	NA	
Feature objectives:				
The permanent area occupied by the wetland habitat should be stable and not significantly less than 1732 hectares, other than that occurring from natural patterns of variation				
Condition Assessment:				
1732 ha				
Residual impact reasonably anticipated after mitigation:				
None				

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## D1: Assessment of In Combination Effects

Are there any potential residual non-significant effects on site integrity?	⊠ No □ Yes
If yes, are there additional projects to be considered?	⊠ N/A □ No □ Yes

If yes

Additional project identification:

Potential non-significant effects on site integrity:

## E: Outcome of Appropriate Assessment

Site:	Appropriate Assessment Outcome:
Streedagh Point Dunes SAC	<ul> <li>No adverse effect on site integrity</li> <li>Insignificant adverse effect on site integrity</li> <li>Significant potential adverse effect on site integrity</li> </ul>
Inishmurray SPA	<ul> <li>No adverse effect on site integrity</li> <li>Insignificant adverse effect on site integrity</li> <li>Significant potential adverse effect on site integrity</li> </ul>
Ballintemple and Ballygilgan SPA	<ul> <li>No adverse effect on site integrity</li> <li>Insignificant adverse effect on site integrity</li> <li>Significant potential adverse effect on site integrity</li> </ul>
Drumcliff Bay SPA	<ul> <li>No adverse effect on site integrity</li> <li>Insignificant adverse effect on site integrity</li> <li>Significant potential adverse effect on site integrity</li> </ul>
Cummeen Strand SPA	<ul> <li>No adverse effect on site integrity</li> <li>Insignificant adverse effect on site integrity</li> <li>Significant potential adverse effect on site integrity</li> </ul>