

**Habitats Directive Screening Report  
for the Strandhill Mini-Plan – Variation No. 1  
of the Sligo County Development Plan 2011-2017**

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25 October 2013



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## 1. Introduction

### 1.1 Background and Legislative Context

Sligo County Council has prepared a variation of the Sligo County Development Plan 2011-2017 (CDP) by incorporating a mini-plan for the village of Strandhill (replacing the Strandhill Local Area Plan 2003-2012) as Chapter 44 in Volume 2 Mini-Plans of the CDP. The mini-plan sets out the planning strategy for Strandhill. The variation was adopted by Sligo County Council on 7 October 2013.

An important aspect of the Development Plan is how the Plan may impact on European Sites designated for nature conservation, i.e. Special Areas of Conservation (SAC) and Special Protection Areas (SPA). Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora, better known as “The Habitats Directive”, provides legal protection for habitats and species of European importance. Articles 3 to 9 provide the legislative means to protect habitats and species of Community interest through the establishment and conservation of an EU-wide network of sites known as Natura 2000. These are SACs and SPA’s designated under the Habitats Directive and Birds Directive (Conservation of Wild Birds Directive (79/409/ECC)).

In accordance with the requirements set out under section 177 of the Planning and Development (Amendment) Act 2010 and in the EU Habitats Directive (43/92/EEC) and EU Birds Directive (79/409/EEC), the impacts of the policies and objectives of all statutory land use plans, on certain sites that are designated for the protection of nature (Natura 2000 sites<sup>1</sup>), must be assessed as an integral part of the process of drafting of the plan. This is to determine whether or not the implementation of the proposed plan and its policies could have negative consequences for the habitats or plant and animal species for which these sites are designated. This assessment process is called an Appropriate Assessment (AA) and must be carried out on all stages of the plan making process including the final Plan as adopted.

Natura Impact Reports were completed for the draft Strandhill mini-plan (Appendix A) and for the draft Strandhill mini-plan proposed amendments (Appendix B). The results of those assessments were referred to the statutory authorities and were also made available during each of the relevant public consultation periods.

This report provides an assessment of the final mini-plan which was adopted by Sligo County Council at its meeting on the 10 October 2013 and concludes with an Appropriate Assessment Screening Conclusion Statement. It should be read in conjunction with the final Strandhill mini-plan as adopted by Sligo County Council on 10 October 2013.

Articles 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans and projects likely to affect Natura 2000 sites. Article 6(3) establishes the requirement for Appropriate Assessment (AA):

*Article 6(3): “Any plan or project not directly connected with or necessary to the management of the [Natura 2000] site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subjected to an appropriate assessment of its*

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<sup>1</sup> Natura 2000 sites include Special Areas of Conservation designated under the Habitats Directive and Special Protection Areas designated under the Birds Directive. Special Areas of Conservation are sites that are protected because they support particular habitats and/or plant and animal species that have been identified to be threatened at EU community level. Special Protection Areas are sites that are protected for the conservation of species of birds that are in danger of extinction, or are rare or vulnerable. Special Protection Areas may also be sites that are particularly important for migratory birds. Such sites include internationally important wetlands.

*implications for the site in view of the site's conservation objectives. In light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."*

*Article 6(4): "If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, Member States shall take all compensatory measures necessary to ensure that the overall coherence of the Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted. Where the site concerned hosts a priority natural habitat type and/or a priority species the only considerations which may be raised are those relating to human health or public safety, to the beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest."*

This document provides a record of the Appropriate Assessment process for the Strandhill Mini-Plan Variation no. 1 of the Sligo County Development Plan 2011-2017, as adopted by Sligo County Council on 7 October 2013.

## **1.2 Stages of the Appropriate Assessment**

This document has been prepared in accordance with the European Commission Environment DG document "*Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC*", referred to as the "EC Article 6 Guidance Document". The guidance document provides a non-mandatory methodology for carrying out assessments required under Article 6(3) and (4) of the Habitats Directive, and is viewed as an interpretation of the EU Commission's document "*Managing Natura 2000 sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC*", referred to as "MN2000". In addition, "*Appropriate Assessment Guidance for Planning Authorities*" was published by the Department of the Environment, Heritage and Local Government in December 2009 (DEHLG, 2009) and amended in March 2010. Cognisance has been taken of this document in carrying out this assessment. In complying with the obligations under Article 6(3) and with reference to the guidance documents mentioned above, this AA has been broadly structured as follows:

### **1) Stage 1 – Screening for Appropriate Assessment**

- Description of the plan;
- Identification of relevant Natura 2000 sites potentially affected;
- Identification and description of individual and cumulative impacts likely to result from implementation of the Plan;
- Assessment of the significance of the impacts identified above on site integrity. Exclusion of sites where it can be objectively concluded that there will be no significant effects.

### **2) Stage 2 – Appropriate Assessment**

- Description of the Natura 2000 sites that will be considered further in the AA;
- Description of significant impacts on the conservation features of these sites likely to occur from the Plan;
- Mitigation Measures; and

- Conclusions.

### 3) Stage 3 – Assessment of Alternative Solutions

### 4) Stage 4 – Assessment where no alternative solutions exist and where adverse impacts remain (Imperative Reasons of Overriding Public Interest and Compensation Measures)

The Habitats Directive promotes a hierarchy of avoidance, mitigation and compensatory measures. In the first instance, the Plan should aim to avoid any negative impacts on European sites by identifying possible impacts early in the plan-making, and writing the plan in order to avoid such impacts. Following that, mitigation measures should be applied, if necessary, during the AA process to the point where no adverse impacts on the site(s) remain. If the Plan is still likely to result in adverse effects, and no further practicable mitigation is possible, then it is rejected. If no alternative solutions are identified and the Plan is required for imperative reasons of overriding public interest (IROPI test) under Article 6(4) of the Habitats Directive, then compensation measures are required for any remaining adverse effect.

## 1.3 Terminology

A number of different terms have been used in the recent past to describe the process and outputs associated with Article 6(3) of the Habitats Directive. These include Appropriate Assessment (AA), Habitats Directive Assessment (HDA), Habitats Directive Assessment Report, Natura Impact Statement (NIS), Natura Impact Report (NIR).

In an effort to provide consistency and transparency in the planning process and to come into line with the terminology used in the most recent DEHLG guidance, it has been decided to use just two terms throughout this document.

For the purposes of this report the following terms have been adopted:

- **Appropriate Assessment (AA)** has been used to refer to the process and includes the various stages outlined in Section 1.2 above.
- **Natura Impact Report (NIR)** has been used to refer to the output from the AA process and includes the information necessary for the competent authority to carry out an appropriate assessment of the implications of the Plan.

It should also be noted that the Sligo County Development Plan 2011-2017 also uses the term Habitats Directive Assessment (HDA) in addition to the term Appropriate Assessment to describe the process and outputs associated with Article 6(3) of the Habitats Directive. These terms are used interchangeably throughout the Sligo County Development Plan 2011-2017.

## **2 METHODOLOGY**

### **2.1 Approach**

Appropriate Assessment of the adopted mini-plan was undertaken and the findings of the assessment are presented in this Habitats Directive Screening Report. The approach taken in making the assessment follows *European Communities, Assessment of plans and projects significantly affecting Natura 2000 sites, Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC, 2002*, and on *Local Government and Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities, 2009*.

### **2.2 Data Sources**

The appropriate assessment of potential impacts on the integrity of Natura 2000 sites in this Habitats Directive Screening Report is based on a desktop review of information relating to these sites and to the habitats and species that they support. References and data used are cited in the back of this report.

### **2.3 Consultation**

This report will be published and placed on public display with the adopted Mini-Plan.

### 3 STAGE 1 – SCREENING FOR APPROPRIATE ASSESSMENT

#### 3.1 Description of the Plan

A total of 18 Proposed Amendments to the Draft Strandhill Mini-Plan / Variation No. 1 of the Sligo County Development Plan 2011-2017 were subject to public consultation for four weeks between the 1<sup>st</sup> and the 28<sup>th</sup> August 2013.

The Proposed Amendments were assessed (Appropriate Assessment) for potential environmental effects after the Planning Authority had determined the need for such an assessment, in accordance with the requirements of Section 13(6)(aa) of the Planning and Development Act 2000 (as amended).

The outcome of the AA assessment was presented in the *Natura Impact Report for the Proposed Amendments to the Draft Variation / Strandhill Mini-Plan*.

The conclusion of the assessment was that **the Draft Variation/Mini-Plan, if adopted with the proposed amendments A-11 and A-17, was likely to have adverse effects on Natura 2000 sites.**

The Natura Impact Report relating to the Proposed Amendments accompanied the Proposed Amendments on public display.

Of the three submissions received during the public consultation period, the one received from the EPA agreed with the conclusion of the Natura Impact Report on the proposed amendments, which recommended that the proposed amendments A-11 and A-17 should not be included as part of the CDP Variation / Strandhill Mini-Plan.

The Second Manager's Report on submissions relating to the Proposed Amendments re-emphasised the conclusion of the Natura Impact Report and reiterated the recommendations with regard to the proposed amendments A-11 and A-17.

On 7 October 2013, the elected members of Sligo County Council considered the following documents:

- the *Draft Strandhill Mini-Plan / Variation No. 1 of the Sligo County Development Plan 2011-2017*
- the *Natura Impact Report for the Draft Strandhill Mini-Plan / Variation No. 1 of the Sligo County Development Plan 2011-2017*
- the *Proposed Amendments of the Draft CDP Variation No. 1 / Strandhill Mini-Plan*
- the *Addendum I to the SEA Screening Report - Environmental Consequences of the Proposed Amendments to the Draft Variation / Strandhill Mini-Plan*
- the *Natura Impact Report for the Proposed Amendments to the Draft Variation / Strandhill Mini-Plan*
- the *Second Manager's Report on Submissions and Observations Received in Relation to the Proposed Amendments to the Draft Variation / Strandhill Mini-Plan*.

The elected members of Sligo County Council decided to adopt the CDP Variation No. 1 / Strandhill Mini-Plan **without the proposed amendments A-11 and A-17.**

#### 3.2 Screening of Amendments

Of the 18 proposed amendments considered by Sligo County Council in October 2013, 16 of the amendments were adopted without modifications. The Natura Impact Report for the Proposed

Amendments to the Draft Strandhill Mini-Plan/Variation of Sligo County Development Plan 2011-2017 concluded that for the 16 amendments adopted, there was no potential for effects on Natura 2000 sites.

Two proposed amendments, A-11 and A-17, were not adopted by Sligo County Council as part of the CDP Variation No.1.Strandhill Mini-Plan. Rejected amendments are set out in Table 3 below. Consideration of the potential for these final changes to give rise to impacts on any Natura 2000 site is assessed below.

### 3.3 Sites Screened

All Natura 2000 sites within the impact zone of the mini-plan were screened to determine whether rejected amendments A-11 and A-17 had the potential to give rise to impacts on the sites (see Tables 1 and 2). No additional sites were identified to be screened in relation to the rejected amendments. Table 3 below lists the amendments rejected by Sligo County Council at its meeting on the 10 October 2013 when the mini-plan was adopted. Preliminary consideration of the potential for the rejected amendments to give rise to impacts on Natura 2000 sites is set out in column three of Table 3.

Table 1: Possible Impacts on SACs

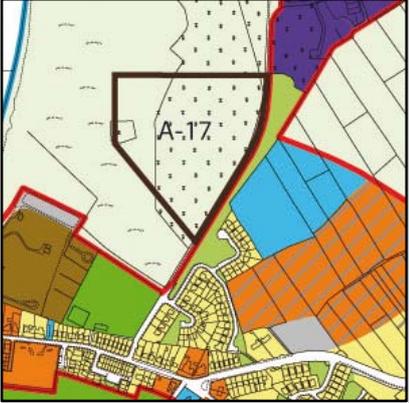
Site Name	Reduction in Habitat Area	Disturbance to Key Species	Habitats or Species Fragmentation	Reduction in Species Density	Changes in Key Indicators of Conservation Value (Water Quality etc.)
Streedagh Point Dunes	None	None	None	None	None
Ben Bulbin, Gleniff and Glende Complex	None	None	None	None	None
Lough Gill	None	None	None	None	None
Union Wood	None	None	None	None	None
Unshin River	None	None	None	None	None
Temple House and Cloonacleigha Loughs	None	None	None	None	None
River Moy	None	None	None	None	None
Ox Mountain Bogs	None	None	None	None	None
Knockalongy and Knockachree Cliffs	None	None	None	None	None
Ballysadare Bay	None	None	None	None	None
Cummeen Strand/Drumcliff Bay	None	None	None	None	None

Table 2: Possible Impacts on SPAs

Site Name	Reduction in Habitat Area	Disturbance to Key Species	Habitats or Species Fragmentation	Reduction in Species Density	Changes in Key Indicators of Conservation Value (Water Quality etc.)
Ardboline Island and Horse Island	None	None	None	None	None
Ballintemple and Ballygilgan	None	None	None	None	None
Drumcliff Bay	None	None	None	None	None
Sligo/Leitrim Uplands	None	None	None	None	None
Cummeen Strand	None	None	None	None	None
Ballysadare Bay	None	None	None	None	None
Aughris Head	None	None	None	None	None

Table 3 Rejected Amendments agreed by Sligo County Council (7 Oct 2013) and preliminary screening

Ref.	Rejected Amendments - Elected Members	Potential for impact on Natura 2000 Sites
A-11 (linked to A-17)	<p>In <b>Section 44.6 Community facilities</b>, insert an additional <b>objective D</b> as follows:</p> <p><del><b>D. Land west of Airport Road, including pine plantation</b></del></p> <p><i>Sligo County Council owns most of the land and the pine plantation to the west of the Airport Road. Within the Southern portion of the afforested area (16.5 acres/ 6.7 ha) it is an objective to accommodate sports and recreation, including any ancillary developments such as dressing rooms etc.</i></p> <p><i>Therefore the County Council owned lands to the west of the Airport Road are zoned for 'Community, Sport &amp; Recreation' to meet this objective and public access will be retained &amp; enabled to continue.</i></p>	None

Ref.	Rejected Amendments - Elected Members	Potential for impact on Natura 2000 Sites
<p><b>A-17</b> (linked to A-11)</p>	<p>Change the zoning of the <del>site marked A-17</del> on the Proposed Amendments Map from 'buffer zone' to 'community, sports and recreation'</p>  <p><del>[Note: the zoning category would be CF-community facilities, as per the Zoning Matrix included in the CDP]</del></p>	<p><b>None</b></p>

### 3.4 Screening Outcome

On the basis of the above, it is concluded that there is no potential for the rejection of the amendments A-11 and A-17 to give rise to impacts on any Natura 2000 sites.

#### 4.0 Finding of No Significant Effects Report Matrix

##### Screening Conclusion Statement for CDP Variation No. 1/Strandhill Mini-Plan

<b>CDP Variation No. 1/Strandhill Mini-Plan FONSE Report Matrix</b>	
Name and Location of Natura 2000 sites subject to screening for appropriate assessment	Cummeen Strand/Drumcliff Bay (Site Code 000627)
Description of the plan	Sligo County Council has prepared a variation the Sligo County Development Plan 2011-2017 (CDP) by incorporating a mini-plan for the village of Strandhill (replacing the Strandhill Local Area Plan 2003-2012) as Chapter 44 in Volume 2 Mini-Plans of the CDP. The mini-plan sets out the planning strategy for Strandhill. The plan was adopted by Sligo County Council on 7 October 2013.
Is the plan directly connected with or necessary to the management of the Natura 2000 sites identified above	No
Are there other projects or plans that together with the amendments being assessed could affect the site (provide details)	There is continuous pressure to increase development around Strandhill. This is promoted through a range of plans including the Sligo County Development Plan 2011-2017. Many of these plans could give rise to projects which result in increased pressure on water quality, pressure to infill and to reclaim parts of the shoreline; to increase recreational marine activity, as well as recreational activity along the shoreline. Any such projects could contribute to habitat loss and give rise to significant disturbance to habitats and species when considered cumulatively.
<b>Assessment of Significant Effects</b>	
Describe how the plan (alone or in combination is likely to affect Natura 2000 sites)	There are two Natura 2000 sites located within the boundary of the Strandhill mini-plan, and there are no policies/objectives contained in the plan which will give rise to direct loss of habitat within any designated site.  A number of potentially negative impacts were identified during the

	<p>screening of the draft plan and its associated amendments.</p> <p>These are set out below:</p> <p>A Natura Impact Report of the draft plan identified a series of objectives which required amendments to ensure that any potential for effects on Natura 2000 sites would be appropriately mitigated. (See Natura Impact Report of the draft plan in Appendix A of this document)</p> <p>A Natura Impact Report undertaken of the proposed amendments to the draft plan identified potential negative impacts on Natura 2000 sites arising from proposed amendments A-11 and A-17. (see Natura Impact Report of the draft plan in Appendix B of this document).</p>
Explain why these effects are not considered significant	<p>The plan as adopted by Sligo County Council in October 2013 incorporates all proposed mitigation measures identified in the Natura Impact Report undertaken on the draft plan.</p> <p>The plan as adopted by Sligo County Council in October 2013 excluded amendments A-11 and A-17, which were identified in the Natura Impact Report as potentially having a significant negative effect on a Natura 2000 site within the plan area.</p>
List of agencies consulted	<p>The draft Strandhill Mini-Plan and proposed amendments to same, as well as the Appropriate Assessment Natura Impact Reports for both documents were referred to all of the statutory consultees including the EPA, the Minister for Arts, Heritage, Gaeltacht and the Islands, and An Taisce during two public consultation phases.</p>
Response to consultation	<p>The EPA responded to notifications at all stages of consultation, making specific comments and suggestions, which were taken into account in the preparation of SEA and AA reports as well as in the drafting of Manager's recommendations to elected members. The DAHG and Leitrim County Council also made contributions supporting the position of the Planning Authority with regard to those proposed amendments which would have had potential for significant environmental effects, if adopted.</p>
<b>Data Collected To Carry Out The Assessment</b>	
Who carried out the assessment	<p>Siobhán Ryan, Heritage Officer, Sligo County Council.</p>
Sources of data	<p>National Parks and Wildlife Service Site Synopses and other data relating to Natura 2000 sites.</p>

Level of assessment completed	Screening
Where can the full results of the assessment be accessed and viewed	This report, the Natura Impact Report for the draft Strandhill Mini-Plan (February 2013), and the Natura Impact Report for the proposed Amendments to the Strandhill Mini- Plan (August 2013).
Date Assessment Completed	25 October 2013

## 5.0 Relevant Documents and References

Draft Strandhill Mini-Plan / Variation No. 1 of the Sligo County Development Plan 2011-2017

Natura Impact Report for the Draft Strandhill Mini-Plan / Variation No. 1 of the Sligo County Development Plan 2011-2017 [February 2013]

Proposed Amendments of the Draft CDP Variation No. 1 / Strandhill Mini-Plan

Natura Impact Report for the Proposed Amendments to the Draft Strandhill Mini-Plan / Variation No. 1 of the Sligo County Development Plan 2011-2017 [August 2013]

Second Manager's Report on Submissions and Observations Received in Relation to the Proposed Amendments to the Draft Variation / Strandhill Mini-Plan.

Environment, Heritage and Local Government, National Parks and Wildlife Service. 2008. The Status of EU Protected Habitats and Species in Ireland.

Environment, Heritage and Local Government, National Parks and Wildlife Service. Various Years. Natura 2000 Site Synopses.

Environment, Heritage and Local Government. 2009. Appropriate Assessment of Plans and Projects in Ireland. Guidance for Planning Authorities.

European Communities. 2000. Managing Natura 2000 sites. The provisions of Article 6 of the Habitats Directive 92/43/EEC. Luxemburg.

European Communities. 2002. Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. Luxemburg.

## **Appendix A**

# **Natura Impact Report for the Proposed variation No. 1 (Strandhill Mini-Plan) of the Sligo County Development Plan 2011-2017**

**Prepared by the Heritage Office of Sligo County Council**

**5 February 2013**



## 1. INTRODUCTION

### 1.1 Background and Legislative Context

Sligo County Council intends to vary the Sligo County Development Plan 2011-2017 (CDP) by incorporating a mini-plan for the village of Strandhill (replacing the Strandhill Local Area Plan 2003-2012) as Chapter 44 in Volume 2 Mini-Plans of the CDP.

An important aspect of the Development Plan is how the Plan may impact on European Sites designated for nature conservation, i.e. Special Areas of Conservation (SAC) and Special Protection Areas (SPA). Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora, better known as “The Habitats Directive”, provides legal protection for habitats and species of European importance. Articles 3 to 9 provide the legislative means to protect habitats and species of Community interest through the establishment and conservation of an EU-wide network of sites known as Natura 2000. These are SACs and SPA’s designated under the Habitats Directive and Birds Directive (Conservation of Wild Birds Directive (79/409/ECC)).

In accordance with the requirements of the EU Habitats Directive (43/92/EEC) and EU Birds Directive (79/409/EEC), the impacts of the policies and objectives of all statutory land use plans on certain sites that are designated for the protection of nature (Natura 2000 sites<sup>2</sup>), must be assessed as an integral part of the process of drafting of the plan. This is to determine whether or not the implementation of plan policies could have negative consequences for the habitats or plant and animal species for which these sites are designated. This assessment process is called an Appropriate Assessment (AA) and must be carried out on all stages of the plan making process.

Articles 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans and projects likely to affect Natura 2000 sites (Annex 1.1). Article 6(3) establishes the requirement for Appropriate Assessment (AA):

*Article 6(3): “Any plan or project not directly connected with or necessary to the management of the [Natura 2000] site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subjected to an appropriate assessment of its implications for the site in view of the site’s conservation objectives. In light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”*

*Article 6(4): “If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, Member States shall take all compensatory measures necessary to ensure that the overall coherence of the Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted. Where the site concerned hosts a priority natural habitat type and/or a priority species the only considerations which may be raised are those relating*

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<sup>2</sup> Natura 2000 sites include Special Areas of Conservation designated under the Habitats Directive and Special Protection Areas designated under the Birds Directive. Special Areas of Conservation are sites that are protected because they support particular habitats and/or plant and animal species that have been identified to be threatened at EU community level. Special Protection Areas are sites that are protected for the conservation of species of birds that are in danger of extinction, or are rare or vulnerable. Special Protection Areas may also be sites that are particularly important for migratory birds. Such sites include internationally important wetlands.

*to human health or public safety, to the beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest."*

This document provides a record of the Appropriate Assessment process for the proposed variation No. 1 Strandhill Mini-Plan of the Sligo County Development Plan 2011-2017.

### **Sligo County Development Plan 2011-2017**

Sligo County Development Plan came into force on 13 June 2011. It will remain operational for a period of maximum six years. The Plan sets out the Council's policies and objectives for the proper planning and sustainable development of the County of Sligo.

The undertaking of Appropriate Assessment (AA) is mandatory in the case of development plans. The AA of the CDP 2011-2017 was undertaken by environmental consultants CAAS on behalf of Sligo County Council. The resultant Appropriate Assessment Screening Report was published alongside the CDP 2011-2017.

The Appropriate Assessment informed the policies and objectives of the Plan and also suggested appropriate mitigation measures, which were incorporated in to the relevant chapters of the Plan upon its adoption in 2011.

This Natura Impact Report should be read in conjunction with the CDP 2011-2017 and the associated Appropriate Assessment Screening Report.

Sligo CDP and its associated Appropriate Assessment Screening Report are available at [www.sligococo.ie/cdp](http://www.sligococo.ie/cdp).

### **1.2 Stages of the Appropriate Assessment**

This document has been prepared in accordance with the European Commission Environment DG document "*Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC*", referred to as the "EC Article 6 Guidance Document". The guidance document provides a non-mandatory methodology for carrying out assessments required under Article 6(3) and (4) of the Habitats Directive, and is viewed as an interpretation of the EU Commission's document "*Managing Natura 2000 sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC*", referred to as "MN2000". In addition, "*Appropriate Assessment Guidance for Planning Authorities*" was published by the Department of the Environment, Heritage and Local Government in December 2009 (DEHLG, 2009) and amended in March 2010. Cognisance has been taken of this document in carrying out this assessment. In complying with the obligations under Article 6(3) and with reference to the guidance documents mentioned above, this AA has been broadly structured as follows:

#### **1) Stage 1 – Screening for Appropriate Assessment**

- Description of the plan;
- Identification of relevant Natura 2000 sites potentially affected;
- Identification and description of individual and cumulative impacts likely to result from implementation of the Plan;

- Assessment of the significance of the impacts identified above on site integrity. Exclusion of sites where it can be objectively concluded that there will be no significant effects.

## 2) Stage 2 –Appropriate Assessment

- Description of the Natura 2000 sites that will be considered further in the AA;
- Description of significant impacts on the conservation features of these sites likely to occur from the Plan;
- Mitigation Measures; and
- Conclusions.

The Habitats Directive promotes a hierarchy of avoidance, mitigation and compensatory measures. In the first instance, the Plan should aim to avoid any negative impacts on European sites by identifying possible impacts early in the plan-making, and writing the plan in order to avoid such impacts. Following that, mitigation measures should be applied, if necessary, during the AA process to the point where no adverse impacts on the site(s) remain. If the Plan is still likely to result in adverse effects, and no further practicable mitigation is possible, then it is rejected. If no alternative solutions are identified and the Plan is required for imperative reasons of overriding public interest (IROPI test) under Article 6(4) of the Habitats Directive, then compensation measures are required for any remaining adverse effect.

### 4.1 Terminology

A number of different terms have been used in the recent past to describe the process and outputs associated with Article 6(3) of the Habitats Directive. These include Appropriate Assessment (AA), Habitats Directive Assessment (HDA), Habitats Directive Assessment Report, Natura Impact Statement (NIS), Natura Impact Report (NIR).

In an effort to provide consistency and transparency in the planning process and to come into line with the terminology used in the most recent DEHLG guidance, it has been decided to use just two terms throughout this document.

For the purposes of this report the following terms have been adopted:

- **Appropriate Assessment (AA)** has been used to refer to the process and includes the various stages outlined in Section 1.2 above.
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It should also be noted that the Sligo County Development Plan 2011-2017 also uses the term Habitats Directive Assessment (HDA) in addition to the term Appropriate Assessment to describe the process and outputs associated with Article 6(3) of the Habitats Directive. These terms are used interchangeably throughout the Sligo County Development Plan 2011-2017.

## **2.1 Approach**

Appropriate Assessment of the draft Mini-Plan was undertaken and the findings of the assessment are presented in this Natura Impact Report. The approach taken in the making of this assessment follows *European Communities, Assessment of plans and projects significantly affecting Natura 2000 sites, Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC, 2002*, and on *Local Government and Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities, 2009*. As the Mini-Plan is progressed through the plan making process the appropriate assessment process will continue in tandem and will inform the decision making process in terms of any likely significant impacts arising from the Mini-Plan on Natura 2000 sites.

## **2.2 Data Sources**

The appropriate assessment of potential impacts on the integrity of Natura 2000 sites in this report is based on a desktop review of information relating to these sites and to the habitats and species that they support. References and data used are cited in the back of this report.

## **2.3 Consultation**

This report will be placed on public display with the draft Mini-Plan and will be referred to Government Departments and other statutory consultees for consideration during the consultation process. Submissions on same will be taken into consideration in the drafting of the final plan and accompanying Natura Impact Report.

### 3 STAGE 1 – SCREENING FOR APPROPRIATE ASSESSMENT

#### 3.1 Description of the Plan

##### 3.1.1 Main Goal – Consolidation

The Draft Strandhill Mini-Plan promotes sustainable development at a local level through the balanced allocation of land to various uses and through objectives aimed at protecting the natural and built heritage.

The Mini-Plan seeks the consolidation and sustainable development of the area to cater for the needs of the settlement's population, its seasonal visitors and the inhabitants of the surrounding area.

In addition to the existing general policies in Chapters 3 to 12 of the CDP, and the Mini-Plan policies contained in Chapter 13, the Strandhill Mini-Plan contains detailed objectives applicable to specific areas in the village.

The Mini-Plan provides an overview of Strandhill under the following headings:

- Village profile
- Population and housing
- Community facilities
- Commercial and enterprise development
- Infrastructure
- Archaeological heritage
- Natural heritage
- Coastal erosion

##### 3.1.2 Mini-Plan Objectives

The Mini-Plan then provides a suite of objectives in relation to the following themes:

- Landscape, natural heritage and open space
- Coastal protection
- Built heritage, streetscape and building design
- Mixed-use zones
- Transport, circulation and parking
- Community facilities
- Tourism development
- Business and enterprise
- Buffer zone
- Wastewater treatment

**Note:** All the policies and objectives contained in Chapters 3 to 12 of the CDP are applicable to all settlements in County Sligo. Policies in Chapter 13 are applicable to all mini-plans. These policies and objectives have already been assessed for effects on Natura 2000 Sites through the Appropriate Assessment (AA) process in preparing the CDP 2011-2017.

#### 3.2 Features of the Plan that Could Impact on Natura 2000 Sites

The key aspects of the Plan which could give rise to direct / indirect impacts to Natura 2000 sites will principally be related to zonings, the mini-plan objectives, infrastructural provision and upgrades, coastal protection works, as well as recreational infrastructure and activities.

The main threats to Natura 2000 sites in general arise from the density of population present in the Strandhill area in close proximity to the sites. Human pressure on the sites can be manifested in a number of ways either directly in the form of land take, trampling and disturbance by people themselves; or indirectly, for example, in the form of water quality deterioration resulting from sewage effluent and storm water discharges. The relative importance of these potential impacts will vary from site to site depending on the particular circumstances of the site and of the human pressure in the vicinity.

Related to the mini-plan for Strandhill is the need for adequate recreational facilities and given the strong coastal features in Strandhill this can include provision of recreational infrastructure, promenades etc. If located in or adjacent to a protected site, such developments can have likely significant impacts on Natura 2000 sites. Similarly, provision of footpaths and cycleways within and close to Natura 2000 sites can have predicted and unforeseen negative impacts.

The provision of infrastructure is also a key consideration including wastewater treatment, drainage systems, waste management facilities and coastal protection works. The Natura 2000 sites within the Strandhill Mini-Plan area are all coastal, and may be directly impacted by land take for infrastructural development or through pollution of these sensitive sites; therefore, it is essential that zonings take account of the direct and indirect impacts on Natura 2000 sites particularly where inadequate or insufficient wastewater treatment or drainage may be involved.

### **3.3 Brief Description of the Natura 2000 Sites**

This section of the screening process describes the Natura 2000 sites within a 15km radius of the Mini-Plan area. A 15km buffer zone was chosen as a precautionary measure, to ensure that all potentially affected Natura 2000 sites are included in the screening process (**Figures 1 - 4**). **Table 3.1** (candidate Special Areas of Conservation) and **Table 3.2** (Special Protection Areas) list the Natura 2000 sites that are within 15km of the plan area. The qualifying features for each site have been obtained from the 'SAC Datasheets' available through the NPWS website:

<http://www.npws.ie/en/ProtectedSites/SpecialAreasofConservationSACs/>.

The standard abbreviated name of each Annex I habitat type is given in **Table 3.1**. The full name of the habitat type and details of its characteristics, distribution in Ireland and its conservation status in Ireland can be found at:

<http://www.npws.ie/en/PublicationsLiterature/HabitatsDirectivereport07/Habitats/>.

Each qualifying feature also has a standard EU code and these are presented in brackets in **Table 3.1** (e.g. 'Vegetated sea cliffs (1230)' means: 'habitat type 1230 Vegetated sea cliffs of the Atlantic and Baltic Coasts'. Common names and species code are given for Annex II species, e.g. 'Narrowmouthed whorl snail (1014)'.

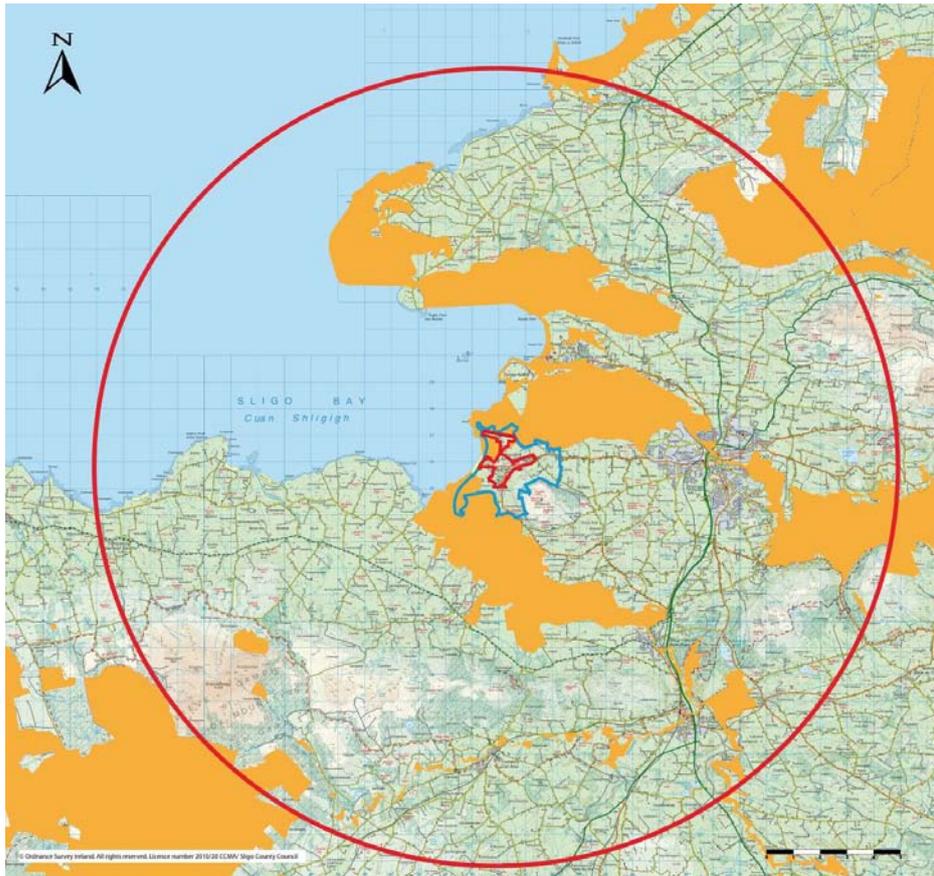


Fig. 1 Special Areas of Conservation (orange) within 15km (red circle) of Strandhill.

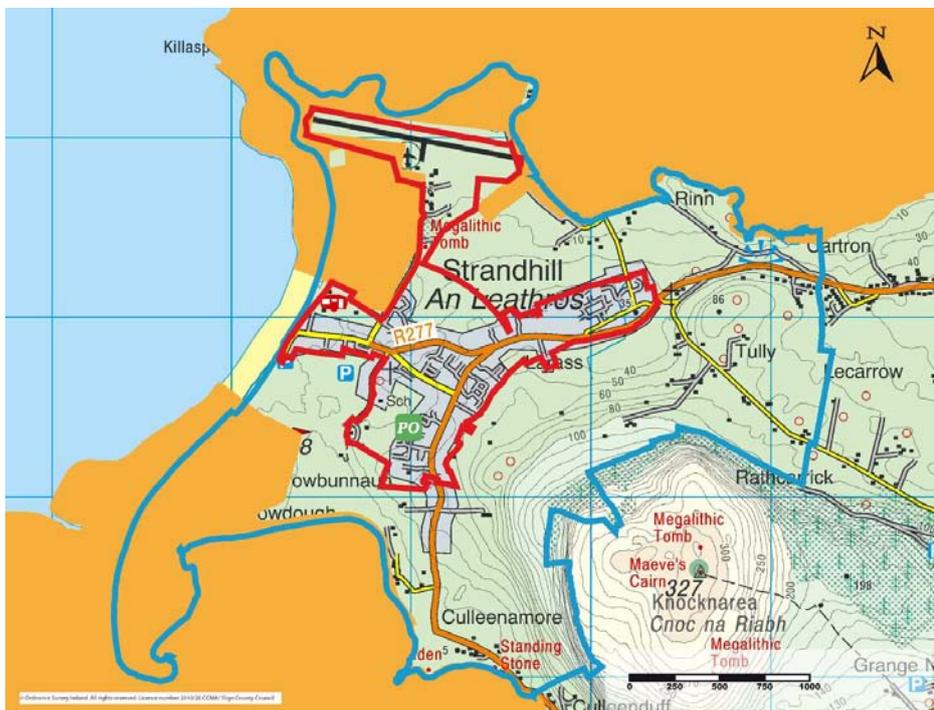


Fig. 2 Special Areas of Conservation immediately adjoining or within the Plan boundary.

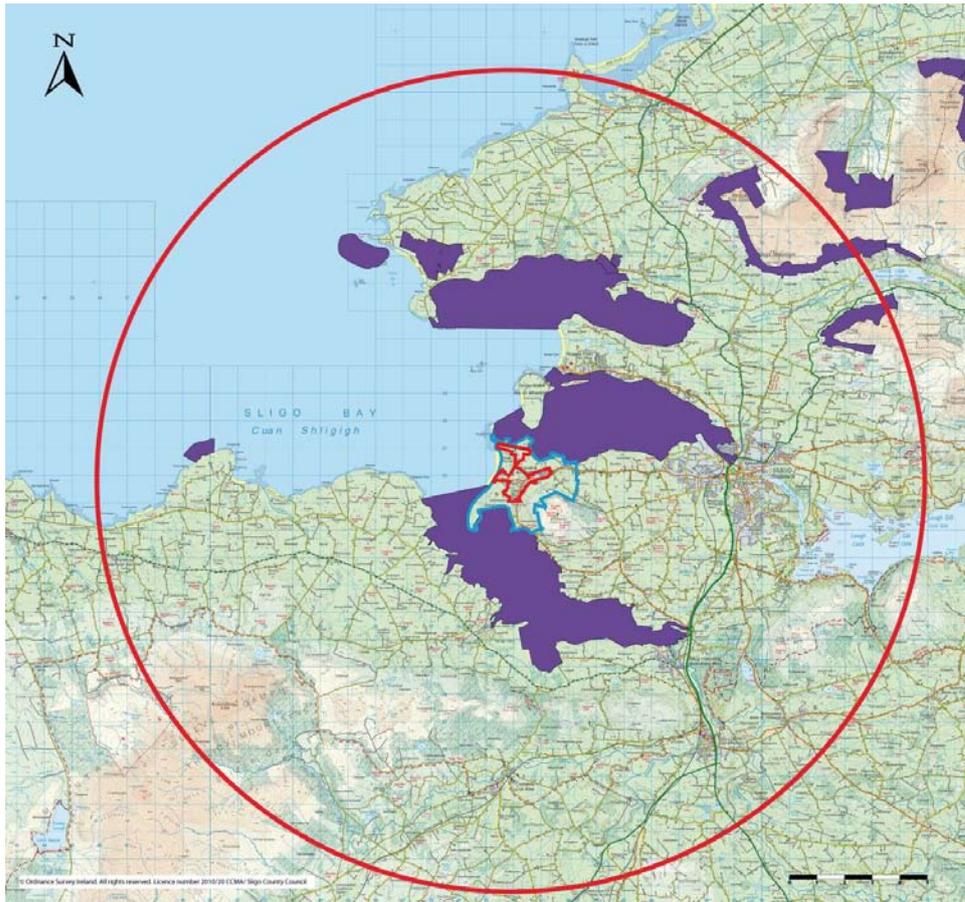


Fig. 3 Special Protection Areas (purple) within 15km (red circle) of Strandhill.



Fig. 4 Special Protection Areas immediately adjoining or within the Plan boundary.

### 3.3.1 Priority Habitats and Species

A number of species and habitats are given 'Priority' status in the Habitats Directive by the EU because they are considered to be particularly vulnerable and are mainly, or exclusively, found within the European Union.

There are no 'Priority Species' currently known from Ireland.

Priority Habitats are present in Ireland and are present within the Natura 2000 Sites adjoining Strandhill. These are prefixed with an asterisk (for example, '\*Fixed Dunes (2130)') in **Table 3.1** and in subsequent tables in this report. The importance of Priority Habitat is emphasised at several places in the Directive (Articles 4 and 5 and Annex III), not only in terms of the selection of sites, but also in the measures required for site protection (Article 6).

**Table 3.1 cSAC's within 15km of the Strandhill Mini-Plan Area including known threats.**

Site Code	Site Name	Qualifying Feature		Documented Potential Threats*
		Annex I Habitat	Annex II Species	
000623	Ben Bulbin, Gleniff and Glenade Complex	European dry heaths(4030), Alpine and Boreal heaths(4060), Calcareous rocky slopes with chasmophytic vegetation (8210),  Calcareous and calcshist screes of the montane to alpine levels (Thlaspietea rotundifolii) (8120), Juniperus communis formations on heaths or calcareous grasslands(5130), * Petrifying springs with tufa formation (Cratoneurion) (7220), Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation(3260).	Lutra Lutra (European Otter) (1355), Vertigo geyeri (Geyer's Whorl Snail) (1013).	Changes in local hydrology including drainage, Direct loss of habitat to development, Arterial drainage/water abstraction/lowering of the regional water table, Introduction of alien invasive species, Peat Extraction, Overgrazing, Forestry, Burning, Agricultural reclamation, Illegal Dumping, Burning.

Site Code	Site Name	Qualifying Feature		Documented Potential Threats*
		Annex I Habitat	Annex II Species	
001680	Streedagh Point Dunes	<p>* Fixed coastal dunes with herbaceous vegetation (grey dunes) (2130),</p> <p>Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) (2120),</p> <p>Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) (1330),</p> <p>Mediterranean salt meadows (<i>Juncetalia maritimi</i>) (1410),</p> <p>Perennial vegetation of stony banks (1220),</p> <p>Mudflats and sandflats not covered by seawater at low tide (1140),</p>	<p><i>Vertigo angustior</i> (Narrow-mouthed Whorl Snail) (1014).</p>	<p>Agricultural improvements/Reclamation</p> <p>Drainage/Changes in local hydrology including water abstraction,</p> <p>Erosion (natural and anthropogenic),</p> <p>Agricultural abandonment,</p> <p>Overgrazing/undergrazing,</p> <p>Bracken and scrub encroachment,</p> <p>Tourism related development,</p> <p>Decrease in water quality/increased pollution,</p> <p>Direct loss of habitat to development,</p> <p>Tourism related development,</p> <p>Introduction of alien invasive species,</p> <p>Illegal Dumping,</p> <p>Burning,</p> <p>Quarrying/removal of sand,</p> <p>Aquaculture.</p>
001976	Lough Gill	<p>Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation (3150),</p> <p>*Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, <i>Alnion incanae</i>, <i>Salicion albae</i>) (91E0),</p> <p>Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in British Isles (91A0),</p>	<p><i>Petromyzon marinus</i> (Sea Lamprey) (1095),</p> <p><i>Lampetra planeri</i> (Brook Lamprey) (1096),</p> <p><i>Lampetra fluviatilis</i> (River Lamprey) (1099),</p> <p><i>Salmo salar</i> (Atlantic Salmon) (1106),</p> <p><i>Lutra lutra</i> (European Otter) (1355),</p> <p><i>Autropotamobius pallipes</i> (Freshwater White-clawed Crayfish) (1092).</p>	<p>Decrease in water quality/Increased pollution,</p> <p>Changes in water flow rates</p> <p>Arterial drainage/water abstraction/lowering of the regional water table,</p> <p>Siltation,</p> <p>Loss of fringe vegetation,</p> <p>Changes in seasonal water levels/fluctuations,</p> <p>Direct loss of habitat to development,</p> <p>Loading from effluents(WWTP),</p> <p>Recreation/amenity use</p> <p>Developments – marinas,</p> <p>Introduction of alien invasive species,</p> <p>Illegal Dumping,</p> <p>Crayfish Fishing.</p>
000638	Union Wood	<p>Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in British Isles (91A0).</p>		<p>Direct loss of habitat to development,</p> <p>Amenity/recreational use,</p> <p>Invasive species,</p> <p>Lack of/inappropriate woodland management,</p> <p>Overgrazing (deer),</p> <p>Introduction of alien invasive species,</p> <p>Illegal Dumping,</p> <p>Felling/Removal of Trees.</p>

Site Code	Site Name	Qualifying Feature		Documented Potential Threats*
		Annex I Habitat	Annex II Species	
001898	Unshin River	Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation (3260), *Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) (91E0).	Salmo salar (Atlantic Salmon) (1106), Lutra lutra (European Otter) (1355).	Decrease in water quality/Increased pollution, Changes in water flow rates, Arterial drainage/water abstraction/lowering of the regional water table, Siltation, Loss of fringe vegetation, Changes in seasonal water levels/fluctuations, Direct loss of habitat to development, Loading from effluents(WWTP), Recreation/amenity use, Developments – marinas, Introduction of alien invasive species, Illegal Dumping.
000636	Temple House and Cloonacleigha Loughs	Hard oligo-mesotrophic waters with benthic vegetation of Chara spp., (3140), Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation (3260), Degraded raised bogs still capable of natural regeneration (7120), Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) (6410), *Alluvial forests with Alnus glutinosa and Fraxinus excelsior (91E0).		Decrease in water quality/Increased pollution, Changes in water flow rates, Arterial drainage/water abstraction/lowering of the regional water table, Siltation, Loss of fringe vegetation, Changes in seasonal water levels/fluctuations, Direct loss of habitat to development, Loading from effluents(WWTP), Recreation/amenity use, Developments – marinas, Introduction of alien invasive species, Illegal Dumping.
002298	River Moy	*Active raised bogs (7110), Degraded raised bogs still capable of natural regeneration (7120), Depressions on peat substrates of the Rhynchosporion (7150), Old sessile oak woods with Ilex and Blechnum in British Isles (91A0), *Alluvial forests with Alnus glutinosa and Fraxinus excelsior (91E0).	Salmo salar (Atlantic Salmon) (1106), Petromyzon marinus (Sea Lamprey) (1095), Lampetra planeri (Brook Lamprey) (1096), Lutra lutra (European Otter) (1355), Austropotamobius pallipes (Freshwater White-clawed Crayfish) (1092).	Decrease in water quality/Increased pollution, Changes in water flow rates Arterial drainage/water abstraction/lowering of the regional water table, Siltation, Loss of fringe vegetation, Changes in seasonal water levels/fluctuations, Direct loss of habitat to development, Loading from effluents(WWTP), Recreation/amenity use, Developments – marinas, Introduction of alien invasive species, Illegal Dumping, Felling/Removal of Trees, Crayfish Fishing.

Site Code	Site Name	Qualifying Feature		Documented Potential Threats*
		Annex I Habitat	Annex II Species	
002006	Ox Mountain Bogs	Blanket bog (*active only) (7130), Northern Atlantic wet heaths with Erica tetralix (4010), Natural dystrophic lakes and ponds (3160), Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) (3110), Depressions on peat substrates of the Rhynchosporion (7150).	Vertigo geyeri (Geyer's Whorl Snail) (1013).	Changes in local hydrology including drainage, Peat Extraction, Overgrazing, Forestry, Burning, Direct loss of habitat to development Arterial drainage/water abstraction/lowering of the regional water table, Agricultural reclamation, Introduction of alien invasive species Illegal Dumping, Increased pollution/reduction in water quality.
001669	Knockalongy and Knockachree Cliffs	Calcareous rocky slopes with chasmophytic vegetation (8210), Siliceous rocky slopes with chasmophytic vegetation (8220), Northern Atlantic wet heaths with Erica tetralix (4010), Blanket bog (*active only) (7130), Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) (3110),	Trichomanes speciosum (Killarney Fern) (1421).	Changes in local hydrology including drainage, Peat Extraction, Overgrazing, Forestry, Burning, Direct loss of habitat to development, Arterial drainage/water abstraction/lowering of the regional water table, Agricultural reclamation, Introduction of alien invasive species, Illegal Dumping, Increased pollution/reduction in water quality, Quarrying/removal of sand.
000622	Ballysadare Bay	Estuaries (1130), Mudflats and sandflats not covered by seawater at low tide (1140), Embryonic shifting dunes (2110), Shifting dunes along the shoreline with Ammophila arenaria (white dunes) (2120), *Fixed coastal dunes with herbaceous vegetation (grey dunes) (2130), Humid dune slacks (2190),	Phoca Vitulina (Common Seal) (1365), Vertigo angustior (Narrow-mouthed Whorl Snail) (1014).	Decrease in water quality/Increased pollution Development of marinas and ports Disturbance to marine mammals Dumping at sea Direct loss of habitat to development Recreational/amenity use Agricultural improvements/Reclamation Drainage/Changes in local hydrology including water abstraction Erosion (natural and anthropogenic) Agricultural abandonment Overgrazing/undergrazing Bracken and scrub encroachment Tourism related development Introduction of alien invasive species Illegal Dumping Burning Quarrying/removal of sand Aquaculture

Site Code	Site Name	Qualifying Feature		Documented Potential Threats*
		Annex I Habitat	Annex II Species	
000627	Cummeen Strand/Drumcliff Bay	<p>Estuaries (1130), Mudflats and sandflats not covered by seawater at low tide (1140), Embryonic shifting dunes (2110), Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) (2120), *Fixed coastal dunes with herbaceous vegetation (grey dunes) (2130), *Petrifying springs with tufa formation (<i>Cratoneurion</i>) (7220), <i>Juniperus communis</i> formations on heaths or calcareous grasslands (5130).</p>	<p><i>Phoca vitulina</i> (Common Seal) (1365), <i>Vertigo angustior</i> (Narrow-mouthed Whorl Snail) (1014).</p>	<p>Decrease in water quality/Increased pollution Development of marinas and ports Disturbance to marine mammals Dumping at sea Direct loss of habitat to development Recreational/amenity use Agricultural improvements/Reclamation Drainage/Changes in local hydrology including water abstraction Erosion (natural and anthropogenic) Agricultural abandonment Overgrazing/undergrazing Bracken and scrub encroachment Tourism related development Introduction of alien invasive species Illegal Dumping Burning Quarrying/removal of sand Aquaculture</p>

**Table 3.2 SPA's within 15km of the Strandhill Mini Plan Area including known threats.**

Site Code	Site Name	Qualifying Feature Annex I Species	Documented Potential Threats*
004135	Ardboline Island and Horse Island	Site is selected for: Cormorant, Barnacle Goose.  Additional Special Conservation Interests: Corncrake	Direct and indirect impacts to the habitats of the bird species of conservation interests (loss of habitat) Direct loss of habitat to development Water quality/pollution Disturbance including recreation/amenity use Introduction of alien invasive species Illegal Dumping Disturbance from Recreational/amenity use Inappropriate land management
004234	Ballintemple and Ballygilgan	Site is selected for: Barnacle Goose.	Direct and indirect impacts to the habitats of the bird species of conservation interests (loss of habitat) Direct loss of habitat to development Water quality/pollution Disturbance including recreation/amenity use Introduction of alien invasive species Illegal Dumping Disturbance from Recreational/amenity use Inappropriate land management
004013	Drumcliff Bay	Site is selected for: Barnacle Goose, Sanderling,  Additional Special Conservation Interests: Wetland & Waterbirds	Direct and indirect impacts to the habitats of the bird species of conservation interests (loss of habitat) Direct loss of habitat to development Water quality/pollution Disturbance including recreation/amenity use Introduction of alien invasive species Illegal Dumping Disturbance from Recreational/amenity use Inappropriate land management
004187	Sligo/Leitrim Uplands	Site is selected for: Peregrine, Chough.	Direct and indirect impacts to the habitats of the bird species of conservation interests (loss of habitat) Direct loss of habitat to development Water quality/pollution Disturbance including recreation/amenity use Introduction of alien invasive species Illegal Dumping Disturbance from Recreational/amenity use Inappropriate land management
004035	Cummeen Strand	Site is selected for: Light-bellied Brent Goose .  Additional Special Conservation Interests: Oystercatcher, Redshank, Wetland & Waterbirds	Direct and indirect impacts to the habitats of the bird species of conservation interests (loss of habitat) Direct loss of habitat to development Water quality/pollution Disturbance including recreation/amenity use Introduction of alien invasive species Illegal Dumping Persecution (Poisoning) Disturbance from Recreational/amenity use Inappropriate land management

Site Code	Site Name	Qualifying Feature Annex I Species	Documented Potential Threats*
004129	Ballysadare Bay	Site is selected for: Light-bellied Brent Goose and Bar-tailed Godwit.  Additional Special Conservation Interests: Grey Plover, Dunlin, Redshank, Wetland & Waterbirds.	Direct and indirect impacts to the habitats of the bird species of conservation interests (loss of habitat) Direct loss of habitat to development Water quality/pollution Disturbance including recreation/amenity use Introduction of alien invasive species Illegal Dumping Disturbance from Recreational/amenity use Inappropriate land management
004133	Aughris Head	Site is selected for:  Kittiwake.	Direct and indirect impacts to the habitats of the bird species of conservation interests (loss of habitat) Direct loss of habitat to development Water quality/pollution Disturbance including recreation/amenity use Introduction of alien invasive species Illegal Dumping Disturbance from Recreational/amenity use Inappropriate land management

### 3.3.2 Conservation Objectives

A Natura 2000 site's Conservation Objectives are defined by DAHG and are, "intended to ensure that the relevant Annex I habitats and Annex II species present on a site are maintained in a favourable condition" (DEHLG, 2010). The DEHLG guidelines state that, "The Conservation Objectives derive from the qualifying interests, the Natura 2000 standard data form, and the management plan for the site, with summary information also available in the site synopsis." Whilst the Natura 2000 standard data forms and site synopses do present details of the qualifying features of Natura 2000 sites, and list the generic threats to those features, they do not define the Conservation Objectives of the site.

For the purposes of this assessment, information on the Conservation Objectives for the sites has been gained from consultation with NPWS relating to the Border Regional Planning Guidelines and NPWS generic Conservation Objectives for Natura 2000 Sites where no Management Plan is yet available.

Generic Conservation Objectives for SPAs are as follows:

- To maintain the bird species of special conservation interest for which the SPA has been listed, at favourable conservation status.

For cSACs, generic Conservation Objectives are as follows:

- To maintain Annex I habitats and Annex II species for which the cSAC has been selected at favourable conservation status;
- To maintain the extent species richness and biodiversity of the entire site; and
- To establish effective liaison and co-operation with landowners, legal users and relevant authorities.

The favourable conservation status of a species can be described as being achieved when:

population data on the species concerned indicate that it is maintaining itself, and the natural range of the species is neither being reduced or likely to be reduced for the foreseeable future, and there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

Favourable conservation status of a habitat can be described as being achieved when:

its natural range, and area it covers within that range, is stable or increasing, and the ecological factors that 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 as defined below.

### **3.3.3 Documented Threats to the cSACs and to their Qualifying Features**

Documented threats to Habitats Directive Annex I habitats and Annex II species in Ireland are presented in the 'Backing documents' and 'Form' for each habitat and species which are available at:

<http://www.npws.ie/en/PublicationsLiterature/HabitatsDirectivereport07/>. Not all of these threats will apply to all cSACs in which these habitats and species are present; however gathering information on the documented perceived threats to the qualifying features of the sites (and therefore to the Conservation Objectives of the sites and the integrity of the sites) is an important prerequisite for assessing what are the 'likely significant effects' on the sites resulting from the Plan. No such information is available for Birds Directive Annex I bird species, and hence this method of inferring Conservation Objectives cannot be applied to SPAs.

**Table 3.1** presents details of those threats, identified by NPWS, which it is considered likely will apply to the SAC's that are included in this assessment.

It is important to realise that many of these threats do not necessarily represent activities that occur within the boundary of the Natura 2000 site. This applies in particular to aquatic and marine features and systems which can be affected by impact sources that occur a large distance from the site.

### **3.3.4 Documented Threats to Special Protection Areas**

Similar threats will apply to many of the SPAs that often correspond geographically to the cSACs. Generally speaking, the threats to the Annex I habitats and Annex II species of the cSAC will also apply to the Annex I bird species and bird populations in general that are the qualifying features of the SPAs. However, the birds that constitute the qualifying features of the SPAs are subject to a number of additional threats that do not generally apply to the qualifying features of the cSAC such as hunting pressure (both legal and illegal); and disturbance from noise and visual cues such as movement of pedestrians and vehicles.

**Table 3.2** presents a summary of the generalised threats to the SPAs relevant to the Strandhill Mini-Plan.

### 3.3.5 Likely Changes to the Sites

The possible impacts that might arise from the Mini-Plan have been examined in the context of a number of factors that could potentially affect the integrity of the Natura 2000 sites. **Tables 3.3** and **3.4** present a summary of the findings of this exercise. Those sites for which potential effects and impacts have been identified have been taken forward to Stage 2 Appropriate Assessment. Those for which no potential impacts are anticipated as a result of implementation of the Plan do not require Stage 2 Appropriate Assessment and are ‘screened-out’ at this stage of the assessment.

**Table 3.3: Possible Impacts on cSACs**

Site Name	Reduction in Habitat Area	Disturbance to Key Species	Habitats or Species Fragmentation	Reduction in Species Density	Changes in Key Indicators of Conservation Value (Water Quality etc.)
Streedagh Point Dunes	None	None	None	None	None
Ben Bulbin, Gleniff and Glende Complex	None	None	None	None	None
Lough Gill	None	None	None	None	None
Union Wood	None	None	None	None	None
Unshin River	None	None	None	None	None
Temple House and Cloonacleigha Loughs	None	None	None	None	None
River Moy	None	None	None	None	None
Ox Mountain Bogs	None	None	None	None	None
Knockalongy and Knockachree Cliffs	None	None	None	None	None
Ballysadare Bay	Potential Impacts	Potential Impacts	Potential Impacts	Potential Impacts	Potential Impacts
Cummeen Strand/Drumcliff Bay	Potential Impacts	Potential Impacts	Potential Impacts	Potential Impacts	Potential Impacts

**Table 3.4: Possible Impacts on SPAs**

Site Name	Reduction in Habitat Area	Disturbance to Key Species	Habitats or Species Fragmentation	Reduction in Species Density	Changes in Key Indicators of Conservation Value (Water Quality etc.)
Ardboline Island and Horse Island	None	None	None	None	None
Ballintemple and Ballygilgan	None	None	None	None	None
Drumcliff Bay	None	None	None	None	None
Sligo/Leitrim Uplands	None	None	None	None	None
Cummeen Strand	Potential Impacts	Potential Impacts	Potential Impacts	Potential Impacts	Potential Impacts
Ballysadare Bay	Potential Impacts	Potential Impacts	Potential Impacts	Potential Impacts	Potential Impacts
Aughris Head	None	None	None	None	None

### 3.4 SCREENING CONCLUSIONS

The likely impacts that will arise from the Strandhill Mini-Plan have been examined in the context of the key environmental factors that could potentially affect the integrity of the Natura 2000 network, e.g. disturbance, habitat loss, etc. and the results of the Screening Assessment, as presented in **Tables 3.3** and **3.4**. These tables indicate “None” for sites where no negative impact is anticipated on the Conservation Objectives or on the overall integrity of the site and “Potential Impact” for those sites where it is certain, likely or uncertain at this stage that impacts on the site may arise as a result of implementation of the Plan. Following the screening stage of the process, two SACs and two SPAs were brought forward for Stage 2 Appropriate Assessment (**Table 3.5**).

**Table 3.5 Summary of Sites Requiring Stage 2 Appropriate Assessment**

Site Name	Site Code	Requirement for Stage 2 Appropriate Assessment
Ballysadare Bay cSAC	000622	Required
Cummeen Strand/Drumcliff Bay cSAC	000627	Required
Cummeen Strand SPA	004035	Required
Ballysadare Bay SPA	004129	Required

## 4. STAGE 2 – DRAFT NATURA IMPACT REPORT

### 4.1 Overview

This section of the NIR records the assessment carried out on the Draft Strandhill Mini- Plan, as published and put on public display in January 2013. Four Natura 2000 sites were brought forward for Stage 2 – Appropriate Assessment. Each individual objective in the Draft Plan was reviewed with respect to each identified Natura 2000 site and a determination was made as to whether there was potential for any aspect of the objective, either alone or in combination with other related objectives, to impact on the integrity of the Natura 2000 site. Where a potential negative impact was identified, mitigation measures were proposed to reduce or eliminate the impact. In line with best practice, a hierarchy of mitigation, beginning with avoidance has been followed. Where avoidance is not possible, caveats have been added or changes to the wording of the objective have been identified which will mitigate the impact at this strategic level. None of the mitigation proposed removes the legal obligation to carry out Appropriate Assessment at the project level where required by the provisions of the Habitats Directive or by the implementing legislation in Ireland.

#### 4.1.1 The Likely Effects of the Plan on Natura 2000 Sites

The AA (and associated SEA) has assessed both the Written Statement and the associated Maps for the draft Strandhill Mini-Plan. **Table 4.1** outlines the elements of the Draft Plan likely to result in negative impacts on Natura 2000 sites within Strandhill. All of the Natura 2000 sites that are included in the Stage 2 assessment are coastal and as the settlement is consolidated, there will be continuing demands made on the coastline, its habitats and surface waters. It is important that the coastal zone is managed and developed in a way that protects Natura 2000 Sites.

Population and economic growth over the past number of years has put pressure on habitats and species within Strandhill due to urbanisation, commercial development, housing and building in general, tourism and recreation and infrastructure provision. This has put strain on Strandhill's protected sites through increased pressure from discharges e.g. from wastewater treatment, and increased recreational disturbance from residential expansion and intensification of existing developments.

A number of objectives in the Mini-Plan propose the development of a network of walking trails that either cross or run along the boundaries of Natura 2000 sites. Whilst it is acknowledged that such facilities are beneficial to people's enjoyment of the countryside and can be valuable in developing a public appreciation of Strandhill's wildlife and biodiversity, it should also be recognised that pedestrians and other recreational users can cause a significant degree of disturbance to habitats, wildlife and particularly to birds including those for which SPAs have been designated.

Other potential impacts associated with the Mini-Plan include:

- Run off of pollutants during construction and operational phases of development;
- Loss, fragmentation and disturbance to habitats due to continued development and development intensification;
- Inadequate wastewater treatment resulting in pollution of surface waters.
- Upgrade of road infrastructure, water and waste water facilities and associated networks.
- Coastal protection works.
- Provision of recreational infrastructure such as promenade, car parks and picnic areas.
- Development of a recreational trail network.

## 4.2 Commitments to the Protection of NATURA 2000 sites in the Draft Mini-Plan

Chapter 44. Strandhill Mini-Plan sets out the following in relation to natural heritage;

*'Strandhill is surrounded by some of Sligo's most valuable natural heritage sites. These sites are protected by European and national legislation, as they support a large number of diverse natural and semi-natural habitats and a wide range of flora and fauna.*

*The following areas are protected under the EU Habitats Directive (92.43/EEC) and EU Birds Directive (79/409/EEC):*

- *Ballysadare Bay SAC (site code 00062)*
- *Cummeen Strand/Drumcliff Bay SAC (site code 000627)*
- *Cummeen Strand SPA (site code 004035)*
- *Ballysadare Bay SPA (site code 004129).*

*Designated sites do not represent the full extent of Strandhill's natural heritage. The wider countryside also makes a valuable contribution to the overall coherence of the ecological network.'*

The followings objectives in relation to Natura 2000 sites are provided in the draft Mini-Plan:

*'44.1 Landscape, natural Heritage, open space.*

- A. Maintain and enhance the conservation value of the Natura 2000 sites surrounding the village. Ensure that Appropriate Assessment Screening is carried out for any plan or project within the Mini-Plan area with potential to impact on Ballysadare Bay SAC (site code 000622), Cummeen Strand/Drumcliff Bay SAC (site code 000627), Cummeen Strand SPA (site code 004035) and Ballysadare Bay SPA (site code 004129).*
- B. Prepare, in consultation with the DoECLG, a management plan for the Council-owned lands at Killaspugbrone, in compliance with the provisions of the Habitats Directive. '*

### 4.2.1 Determination of the Adequacy of the Draft Plan's Commitment to the Protection of Natura 2000 Sites

It is considered that the Draft Plan is thorough and accurate with regard to the requirement for Appropriate Assessment Screening of projects that will or may be progressed as a result of adoption and implementation of the Draft Plan (Obj. 44.1 A).

It is considered that a number of objectives in the Draft Mini-Plan should make specific reference to the requirement for Appropriate Assessment screening. These are objectives which it is considered would pose a particular threat to the integrity of Natura 2000 sites were they to be implemented in the absence of Appropriate Assessment screening. In some cases this is due to the characteristics of the proposals outlined in the objective; in other cases it is due to the location(s) to which the objective refers, or it may be a combination of these factors.

Section 4.5 of this NIR details recommended amendments to specific objectives of the Draft Mini-Plan in this regard. Each section of the Draft Mini-Plan is discussed in sequence.

### **4.3 LIKELY SIGNIFICANT EFFECTS OF THE PLAN ON THE CONSERVATION OBJECTIVES OF NATURA 2000 SITES**

In some cases specific objectives of the plan present specific threats to the conservation objectives of particular Natura 2000 sites. Impacts arising from the implementation of objectives of the draft plan which are likely to cause significant impacts on the integrity and conservation objectives of Natura 2000 sites include activities which give rise to:

- direct impacts on habitats listed on Annex I of the Habitats Directive and for which the site is designated;
- reduction in the area of any habitats within the site;
- direct or indirect damage to the physical quality of the environment (e.g. water quality) in the Natura 2000 site.
- serious or ongoing disturbance to species or habitats for which the Natura 2000 site is selected (e.g. increased noise, illumination, human activity);
- direct or indirect damage to the size, characteristics or reproductive ability of populations of species for which the Natura 2000 site is designated;
- activities which interfere with mitigation measures put in place for other plans or projects.

All of the draft plan objectives were reviewed to identify likely significant effect of the Mini-Plan on the conservation objectives of Natura 2000 sites. Consideration was given to direct and indirect impacts which may arise from activities which could be encouraged by objectives contained in the draft plan. Such activities could include new residential, commercial, infrastructural, recreational or other development which may give rise to direct impacts on habitats or species (loss of habitat, disturbance to species); as well as activities which could have indirect impacts (e.g. activities which could affect water quality or hydrology which could in turn affect the status/health of populations of water dependant habitats or species). Table 4.1 presents details of the specific objectives of the Mini-Plan that are considered potentially to have significant negative impacts on particular Natura 2000 sites. Section 4.5 presents the amendments to these objectives that are considered necessary to remove these specific threats.

Draft Mini-Plan Objectives	Plan Objectives Which Might Give Rise to Impacts on Natura 2000 sites	Potential for impact on Natura 2000 sites	Natura 2000 site(s) which could be affected
<b>44.1 Landscape, natural heritage, open space.</b>	A. Provision for Appropriate Assessment screening of plans and projects.	Positive impact on Natura 2000 sites.	n/a
	B. Provides for preparation of management plan for council owned lands.	Positive impact on Natura 2000 sites.	n/a
	C. Provides for Ecological Impact Assessment in respect of County Biodiversity Site.	Positive impact on biodiversity generally.	n/a
	D. Protection of existing views when assessing development proposals.	No impacts identified.	n/a
	E. Protection of national monuments.	No impacts identified.	n/a
	F i-v. Preservation of views.	No impacts identified.	n/a
	G i-ii. Provision of incidental public open spaces (OS1, OS2, OS3 on objectives map).	No impacts identified re OS1 & OS3.OS2 has potential for negative impact on Natura 2000 sites due to proximity to Natura 2000 site and specifically arising from site preparation, construction, future management and use/introduction of invasive species.	Cummeen Strand/Drumcliff Bay SAC
	H. Provides for retention of open space at Seaview House.	No impacts identified.	n/a
<b>44.2 Coastal protection</b>	A. Provides for preparation of an integrated coastal management plan for Strandhill.	Potential positive and negative impacts on Natura 2000 sites.  Most of the soft coast environment at Strandhill is designated as Natura 2000 sites. Preparation of an integrated coastal management plan should be undertaken in consultation with NPWS, DAHG and should be subject to appropriate assessment.	Cummeen Strand/Drumcliff Bay cSAC  Ballysadare Bay cSAC

	B. Objective to maintain an 80m natural buffer along the shoreline.	Positive impact on Natura 2000 sites.	n/a
	C. Retention of a natural storm berm and dune buffer zone to west of caravan park.	Positive impact on Natura 2000 sites.	n/a
	D. Objective to maintain and review dune management.	Potential positive and negative impacts on Natura 2000 sites. Most of the soft coast environment at Strandhill is designated as Natura 2000 sites. Preparation of an integrated coastal management plan should be undertaken in consultation with NPWS, DAHG and should be subject to appropriate assessment.	Cummeen Strand/Drumcliff Bay cSAC Ballysadare Bay cSAC
<b>44.3 Built heritage and streetscape</b>	A. Objective re design of new development along the Top Road.	No impacts identified.	n/a
	B. Objective to retain buildings of note in new development.	No impacts identified.	n/a
	C. Protection and conservation of Protected Structures within the Plan area.	No impacts identified.	n/a
<b>44.4 Mixed-use zones</b>	A-B. Objectives relating to urban design and development standards.	No impacts identified.	n/a
	C. Objective relating to upgrade of existing properties fronting onto promenade (MIX 1).	No impacts identified.	n/a
	D. Objective to encourage redevelopment of the Promenade 'Corner' subject to any necessary coastal protection measures (MIX 1).	Potential negative impact on Natura 2000 sites arising from associated coastal protection measures. Most of the soft coast environment at Strandhill is designated as Natura 2000 sites. Redevelopment and coastal protection measures should be undertaken in consultation with NPWS, DAHG and should be subject to appropriate assessment.	Cummeen Strand/Drumcliff Bay cSAC Ballysadare Bay cSAC

	E i-iii. Objectives re design and development standards for promenade site (MIX 1).	No impacts identified.	n/a
	F. Objective re urban design along Buenos Aires Drive (MIX 2 and MIX 3)	No impacts identified.	n/a
	G i-iii. Objectives re elements to be incorporated into development proposals for MIX 2 (existing Council car park).	No impacts identified.	n/a
	H. Objective re urban design for existing property at MIX 3.	No impacts identified.	n/a
	I i-ii. Objectives re urban design for development proposals at site MIX 4.	No impacts identified.	n/a
<b>44.5 Transport, circulation and parking</b>	A. Objective re land reservation for a New Airport Road.	<p>Potential negative impact on Natura 2000 sites.</p> <p>Construction of New Airport Road has potential for negative impact on Natura 2000 sites due to site preparation, road construction, future management and use/introduction of invasive species.</p> <p>Future road development should be undertaken in consultation with NPWS, DAHG and should be subject to appropriate assessment at project level.</p>	Cummeen Strand/Drumcliff Bay cSAC
	B. Objective to reserve land for the creation of New Burma Road.	No impacts identified.	
	C. Objective to extend Promenade in a northerly direction to link with existing airport road as indicated on the Objectives Map, while incorporating coastal protection measures.	<p>Potential negative impact on Natura 2000 sites arising from promenade development and associated coastal protection measures.</p> <p>Initiatives which increase human use and access to the coastal zone have the potential to give rise to impacts on habitats and cause disturbance to birds and other</p>	<p>Cummeen Strand/Drumcliff Bay cSAC</p> <p>Ballysadare Bay cSAC</p>

		<p>species generally. At present there is erosion of the dune systems at Strandhill. The proposed transport hub at TRANS 2 will add further to existing recreational pressure on habitats and species.</p> <p>Construction of a promenade and link road have potential for negative impact on Natura 2000 sites due to construction, future management and use/introduction of invasive species and by increasing recreational pressure within Natura 2000 sites.</p> <p>Future promenade and link road development should be undertaken in consultation with NPWS, DAHG and should be subject to appropriate assessment at project level.</p>	
	D. Objective re provision of footpaths and public lighting throughout the village.	No impacts identified.	n/a
	E. Objective to upgrade Golf Club Road.	No impacts identified.	n/a
	F. Objective requiring all new developments to provide for special mobility needs.	No impacts identified.	n/a
	G. Objective to improve traffic flow on existing promenade.	No impacts identified.	n/a
	H. Objective to reserve land along Burma Road for a Public Transport Node (TRANS 1).	No impacts identified.	n/a
	I. Objective re road junction improvements.	No impacts identified.	n/a
<b>44.6 Community Facilities</b>	A. Objective to support improvement and further development of existing sports facilities adjoining the Airport Road.	No impacts identified.	n/a

	B. Objectives requiring any proposed development of community facilities at the Greenfield site at CF1 to provide a range of facilities.	<p>Potential negative impact on Natura 2000 sites.</p> <p>Construction of Community Facilities at CF1 has potential for negative impact on Natura 2000 sites due to site preparation, construction, future use and management and use/introduction of invasive species.</p> <p>Future development should be undertaken in consultation with NPWS, DAHG and should be subject to appropriate assessment at project level.</p>	<p>Cummeen Strand/Drumcliff Bay cSAC</p> <p>Cummeen Strand SPA</p>
	C. Objective to require flood risk assessment for any proposed development at CF1.	No impacts identified.	n/a
<b>44.7 Tourism Development</b>	A. Objective to promote tourism related-infrastructure to increase visitor numbers and local employment.	<p>Potential negative impact on Natura 2000 sites.</p> <p>Initiatives which increase human use and access to the coastal zone have the potential to give rise to impacts on habitats and cause disturbance to birds and other species generally.</p> <p>Future tourism related infrastructure development should be undertaken in consultation with NPWS, DAHG and should be subject to appropriate assessment at project level.</p>	<p>Cummeen Strand/Drumcliff Bay cSAC</p> <p>Ballysadare Bay cSAC</p> <p>Cummeen Strand SPA</p> <p>Ballysadare Bay SPA</p>
	B. Objective to Provide a public parking and picnic area to the north of the caravan park in conjunction with the new road (TRANS 2).	<p>Potential negative impact on Natura 2000 sites.</p> <p>Initiatives which increase human use and access to the coastal zone have the potential to give rise to impacts on habitats and cause disturbance to birds and other</p>	<p>Cummeen Strand/Drumcliff Bay cSAC</p> <p>Ballysadare Bay cSAC</p>

		<p>species generally.</p> <p>At present there is erosion of the dune systems at Strandhill from recreational use. The proposed transport hub at TRANS 2 will add further to existing recreational pressure on protected habitats and species.</p> <p>Future transport hub development should be undertaken in consultation with NPWS, DAHG and should be subject to appropriate assessment at project level.</p> <p>Obj 44.2 A (Coastal Management Plan) and Obj 44.7 C (Development of a Trail Network) will have positive impacts on Natura 2000 sites in protecting the existing soft coast environment and providing a dedicated trail network for sustainable recreational use of Natura 2000 sites.</p>	
	<p>C. Objective to maintain existing trails and and establish further looped recreational trails (1)-(3). Refer to objectives map.</p>	<p>Potential negative and positive impact on Natura 2000 sites.</p> <p>Initiatives which increase human use and access to the coastal zone have the potential to give rise to impacts on habitats and cause disturbance to birds and other species generally.</p> <p>At present there is erosion of the dune systems at Strandhill from recreational use. The proposed recreational trail network will add further to existing recreational pressure on protected habitats and species.</p> <p>Obj 44.2 A (Coastal Management Plan) and Obj 44.7 C (Development of a Trail Network) will have positive impacts on Natura 2000 sites in protecting the existing soft coast</p>	

		environment and providing a dedicated trail network for sustainable recreational use of Natura 2000 sites.	
<b>44.8 Business and enterprise</b>	A. Objective to support the continued operation of Sligo Airport.	No impacts identified.	n/a
	B i-ii. Objective relating to the protection of existing flight paths.	No impacts identified.	n/a
<b>44.9 Buffer zone</b>	A. Objective to encourage landowners to manage land sustainably in buffer area which will remain principally in low-intensity agricultural use.	Potential negative impact on Natura 2000 sites.	
	B. Objective to require all new and replacement agricultural structures to be designed sensitively.	Potential negative and positive impact on Natura 2000 sites.  Future agricultural development adjacent to Natura 2000 sites should be undertaken in consultation with NPWS, DAHG and should be subject to appropriate assessment at project level. Appropriate siting and design of structures will have positive impact on Natura 2000 sites.	Cummeen Strand/Drumcliff Bay cSAC  Ballysadare Bay cSAC  Cummeen Strand SPA Ballysadare Bay SPA
<b>44.10 Wastewater treatment</b>	A. Upgrade of waste water treatment plant (WWTP) to cater for c. 3000 (Population Equivalent).	Potential positive impact on Natura 2000 sites.  The Strandhill WWTP is located on undesignated lands within the Cummeen Strand/Drumcliff Bay cSAC.  The existing plant has a design PE (population equivalent) of 1,500 and is operating at capacity. The existing treatment process comprises primary treatment (screening) and secondary treatment (activated sludge, oxidisation ditch and final settlement). At present waste water and surface water are	Cummeen Strand/Drumcliff Bay cSAC  Cummeen Strand SPA Ballysadare Bay SPA

		<p>combined in the drainage network and coupled with limited capacity this has led to the WWTP not operating optimally on occasions.</p> <p>Strandhill WWTP is included in the Water Services Investment Programme 2010-2013. Significant work has taken place to improve the efficiency of the plant pending the proposed upgrade. An application for a wastewater discharge license is currently being considered by the EPA.</p> <p>Deterioration of water quality could affect habitats (mudflats) upon which species for which the adjoining SPAs are designated are dependent. However, increasing nutrient inputs may also have beneficial impacts by increasing invertebrate availability for birds. Taking this into account and given the distance of the discharge point to the nearest mudflat areas of the SPAs, it is considered that the proposed WWTP upgrade will have a positive impact on winter feeding/roosting sites for birds and water quality generally.</p> <p>The provision of an upgrade for the Strandhill WWTP is currently being planned for delivery.</p> <p>Future WWTP upgrade should be undertaken in consultation with NPWS, DAHG and should be subject to appropriate assessment at project level.</p>	
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## 4.4 Zonings

The Draft Strandhill Mini-Plan, Map 1, provides the proposed Zoning Map for the Plan area. The purpose of zoning is to indicate the land use objectives for all the lands within the Plan area. Zoning aspires to promote the orderly development of the Plan area by eliminating potential conflicts between incompatible land uses, and to establish an efficient basis for investment in public infrastructure and facilities. It should be noted that the portions of Natura 2000 Sites located below the high tide mark are not zoned on the zoning map because these lie outside the remit of the Plan which ends at the high water mark. This includes the majority of the areas of Cummeen Strand SPA and Ballysadare Bay SPA.

### 4.4.1 Zoning

Most of the zoned land within Natura 2000 Sites and most of the land immediately adjacent to them is zoned as 'Buffer zone'. The County Development Plan 2011-2017 Volume 2 Mini-Plans Chapter 13 Mini Plan General Policies provides the following in respect of buffer zones (S. 13.8) in addition to a detailed Mini Plans Zoning Matrix.

*'A. Establish a buffer zone around settlements, between the plan limit and the development limit, with a view to:*

- consolidating and containing settlements within a single development limit;*
- safeguarding land for the future expansion of settlements and for the provision of infrastructure;*
- preserving views;*
- protecting the integrity of archaeological sites and monuments in the area surrounding the village;*
- protecting and enhancing designated nature conservation sites (pNHAs, SACs, SPAs etc);*
- excluding from development those lands which are at risk from flooding.*

*B. Reserve the buffer zone principally for agricultural use.*

*C. Ensure that the siting and construction of new roads and buildings in the buffer zone minimize their visual and environmental impact.*

*E. Within the Buffer Zone, proposals for one-off rural housing shall only be accommodated in cases of proven need of immediate family members of locally-resident families who wish to build on their own land and have no suitable option on their holdings outside the buffer zone.*

*F. In relation to housing, give preference to the sensitive renovation or replacement of existing vacant or derelict structures.'*

Whilst there is potential for some forms of development to result in negative impacts on the conservation objectives of Natura 2000 sites should they be permitted, it is considered that the Council's commitments to Appropriate Assessment that are presented in the Draft Plan, including the amendments proposed in this Report, will be sufficient to prevent inappropriate development from occurring within the boundaries of the Natura 2000 sites.

### 4.4.2 Other Zonings

Small areas of land immediately adjacent to Natura 2000 site boundaries (and therefore in locations where the risk of indirect impacts on the Sites is relatively high) are zoned in a number of ways. It is considered that the Council's commitments to Appropriate Assessment that are presented in the Draft Plan, including the amendments proposed in this Report, will be sufficient to prevent inappropriate development in these areas.

## 4.5 Mitigation Measures

This section presents details of proposals for mitigation to the objectives of the Draft Strandhill Mini-Plan (January 2013). This mitigation, in the context of a land use plan such as the Strandhill Mini-Plan should be viewed as mitigation to ensure that the no negative impacts arise on Natura 2000 sites as a result of implementation of the Plan. It is not intended to remove the requirement (under the provisions of the Habitats Directive) for a detailed consideration of specific proposals at the project level; i.e. 'project level' AA.

### Objective Emphasising the need for Appropriate Assessment Screening:

The draft Mini-Plan provides for a general commitment for appropriate assessment screening as follows:

#### Objective 44.1 A.

*'Maintain and enhance the conservation value of the Natura 2000 sites surrounding the village. Ensure that Appropriate Assessment Screening is carried out for any plan or project within the Mini-Plan area with potential to impact on Ballysadare Bay SAC (site code 000622), Cummeen Strand/Drumcliff Bay SAC (site code 000627), Cummeen Strand SPA (site code 004035) and Ballysadare Bay SPA (site code 004129).'*

### Project-Specific and Location-Specific Objectives that Require Caveats:

In undertaking the assessment of likely significant effects of the Mini-Plan objectives on the conservation objectives of Natura 2000 sites within the impact zone there were a number of cases where the plan objectives have the potential for negative impact on Natura 2000 sites. In most cases these objectives are specific to either a particular project or a particular location and it is considered very likely that some level of conflict will arise between the objective and the need to protect the Natura 2000 sites. Accordingly in these specific cases it is considered appropriate that caveats should be amended to those objectives to ensure no negative impacts on Natura 2000 sites arise from the implementation of the Mini-Plan.

The following amendments to objectives are therefore recommended.

#### Section 44.1 Landscape, natural heritage, open space

Obj. G *'Provide for a number of incidental public open spaces, notably:*

- i. the Sligo entrance to the village, between the new and old R292, where a floral or shrub display might be developed, possibly in conjunction with a piece of public art (location marked OS1 on Objectives Map);*
- ii. a strip of land to the east of the Airport Road, which would lend itself to a tree and shrub belt for amenity and shelter purposes (location marked OS2 on Objectives Map).'*

- iii. *Require any development on the site of Seaview House on Upper Buenos Ayres Drive to retain and landscape a substantial element of open space at the eastern end of the existing garden (location marked OS3 on Objectives Map).*

Should be amended to:

*'Provide for a number of incidental public open spaces whilst ensuring the protection of designated sites through screening for Appropriate Assessment, notably:*

- i. *the Sligo entrance to the village, between the new and old R292, where a floral or shrub display might be developed, possibly in conjunction with a piece of public art (location marked OS1 on Objectives Map);*
- ii. *a strip of land to the east of the Airport Road, which would lend itself to a tree and shrub belt for amenity and shelter purposes (location marked OS2 on Objectives Map).'*
- iii. *Require any development on the site of Seaview House on Upper Buenos Ayres Drive to retain and landscape a substantial element of open space at the eastern end of the existing garden (location marked OS3 on Objectives Map).*

#### **Section 44.2 Coastal Protection**

Obj. A *'Prepare an integrated coastal management plan for Strandhill in consultation with relevant agencies and interested parties. This plan should address, inter alia, the existing and potential recreational uses of the area.'*

Should be amended to:

*'Prepare an integrated coastal management plan for Strandhill in consultation with relevant agencies and interested parties. This plan should address, inter alia, the existing and potential recreational uses of the area. The coastal management plan will ensure the protection of Natura 2000 sites through the Appropriate Assessment process.'*

Obj. D *'Maintain and review dune management, to include, where necessary, appropriate fencing, boardwalks and public information boards.'*

Should be amended to:

*'Maintain and review dune management, to include, where necessary, appropriate fencing, boardwalks and public information boards while taking full account of the need to protect the natural and cultural heritage of the coast and the need to avoid significant adverse impacts on Natura 2000 Sites and on species protected by law.'*

#### **Section 44.4 Mixed Use Zones**

Obj. D. *'Encourage the redevelopment of the Promenade 'Corner' on the sea front (MIX 1, Objectives Map) currently comprising shops, dwellings and a public open space, subject to any necessary coastal protection measures.'*

Should be amended to:

*'Encourage the redevelopment of the Promenade 'Corner' on the sea front (MIX 1, Objectives Map) currently comprising shops, dwellings and a public open space, subject to any necessary coastal protection measures whilst ensuring the protection of designated sites through screening for Appropriate Assessment at project level.'*

#### **Section 44.5 Transport, circulation and parking**

Obj. A. *'Reserve land for a New Airport Road linking the R292 to the existing Airport Road (R277).'*

Should be amended to:

*'Reserve land for a New Airport Road linking the R292 to the existing Airport Road (R277) whilst ensuring the protection of designated sites through screening for Appropriate Assessment at project level.'*

Obj. C *'Extend the Promenade in a northerly direction and link up with the existing Airport Road as indicated on the Objectives Map, to include for the upgrading of the existing lane from the caravan park to the Airport Road. All necessary coastal protection measures should be incorporated into such a project. This extension should be developed in a similar fashion to the existing Promenade whilst also preserving as much as possible of the seafront area as a public amenity.'*

Should be amended to:

*'Extend the Promenade in a northerly direction and link up with the existing Airport Road as indicated on the Objectives Map, to include for the upgrading of the existing lane from the caravan park to the Airport Road whilst taking full account of the need to protect the natural and cultural heritage of the coast and the need to avoid significant adverse impacts on Natura 2000 Sites and on species protected by law. All necessary coastal protection measures should be incorporated into such a project. This extension should be developed in a similar fashion to the existing Promenade whilst also preserving as much as possible of the seafront area as a public amenity.'*

#### **Section 44.6 Community Facilities**

Obj. B *'Require any development proposed on the greenfield site CF1 (refer to the Objectives Map) to provide a range of facilities such as a citizens' advice point, social services, tourist information, skate park and indoor sports. A youth centre and childcare facilities may be provided within the same building or in a separate structure.'*

Should be amended to:

*'Require any development proposed on the greenfield site CF1 (refer to the Objectives Map) to ensure the protection of designated sites through screening for Appropriate Assessment at project level. Any proposed development shall provide a range of facilities such as a citizens' advice point, social services, tourist information, skate park and indoor sports. A youth centre and childcare facilities may be provided within the same building or in a separate structure.'*

#### **Section 44.7 Tourism Development**

Obj. A. *'Promote the development of tourism related-infrastructure and facilities within the village in order to increase visitor numbers and to create more local employment.'*

Should be amended to:

*'Promote the development of tourism related-infrastructure and facilities within the village in order to increase visitor numbers and to create more local employment, subject to Appropriate Assessment under the Habitats Directive'*

Obj. B. *'Provide a public parking and picnic area to the north of the caravan park, in conjunction with the new road (See Section 44.5). This area will be located adjacent to the existing caravan park entrance, from where two-way traffic movements will operate (location marked TRANS 2 on the Objectives Map). In addition, adequate provision will be made for alternative circulation arrangements within the caravan park.'*

Should be amended to:

*'Provide a public parking and picnic area to the north of the caravan park, in conjunction with the new road (See Section 44.5), subject to Appropriate Assessment under the Habitats Directive and the implementation of a Coastal Management Plan (Obj. 44.2 A) and a Management Plan for the Council lands at Killaspugbrone (Obj. 44.1 B.). This area will be located adjacent to the existing caravan park entrance, from where two-way traffic movements will operate (location marked TRANS 2 on the Objectives Map). In addition, adequate provision will be made for alternative circulation arrangements within the caravan park.'*

#### **Section 44.9 Buffer Zone**

Obj. B *'Require all new and replacement agricultural structures to be designed in such manner that they do not interfere with the character of the landscape.'*

Should be amended to:

*'Require all new and replacement agricultural structures to be designed in such manner that they do not interfere with the character of the landscape, whilst ensuring the protection of designated sites through screening for Appropriate Assessment at project level'.*

#### **Section 44.10 Wastewater Treatment**

**Obj. A.** *'Upgrade the wastewater treatment plant at Killaspugbrone to cater for a population equivalent (PE) of circa 3,000.'*

Should be amended to:

*'Upgrade the wastewater treatment plant at Killaspugbrone to cater for a population equivalent (PE) of circa 3,000, whilst ensuring the protection of designated sites through undertaking Appropriate Assessment at project level.'*

## **5. CONCLUSION**

This Natura Impact Report presents the findings of a Stage 2 Appropriate Assessment undertaken on the Draft Strandhill Mini-Plan.

The Appropriate Assessment Screening (Stage 1) identified that there was potential for likely significant effect arising from the adoption and implementation of the draft Mini-Plan. Accordingly, Stage 2 Appropriate Assessment (this Natura Impact Report) was undertaken to identify potential likely significant effects on Natura 2000 sites arising from the implementation of the Draft Mini-Plan.

Where it was identified that some elements of the Draft Mini-Plan had potential to result in adverse effects on the integrity of a Natura 2000 site, mitigation measures in the form of amendments to the Mini-Plan have been proposed in this report. The mitigation measures seek to prevent inappropriate development that could result in significant negative impacts on the conservation objectives of Natura 2000 sites from occurring within the boundaries of the Natura 2000 sites, or adjacent to such sites.

Together with the Council's commitments to the Habitats Directive and Appropriate Assessment that are presented in the Sligo County Development Plan 2011-2017 and this Draft Mini-Plan it is concluded that these measures will be sufficient to ensure that there will be no adverse effect on the integrity of Natura 2000 sites arising from the implementation of the Draft Mini-Plan.

Prepared by

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## **6. References**

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European Communities. 2002. Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. Luxembourg.

## **Appendix B**

# **Natura Impact Report for the Proposed Amendments to the Draft Strandhill Mini-Plan/Variation of Sligo County Development Plan 2011-2017**

**Prepared by the Heritage Office of Sligo County Council**

**1 August 2013**



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## 1. INTRODUCTION

### 1.1 Background and Legislative Context

Sligo County Council intends to vary the Sligo County Development Plan 2011-2017 (CDP) by incorporating a mini-plan for the village of Strandhill (replacing the Strandhill Local Area Plan 2003-2012) as Chapter 44 in Volume 2 Mini-Plans of the CDP.

An important aspect of the Development Plan is how the Plan may impact on European Sites designated for nature conservation, i.e. Special Areas of Conservation (SAC) and Special Protection Areas (SPA). Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora, better known as “The Habitats Directive”, provides legal protection for habitats and species of European importance. Articles 3 to 9 provide the legislative means to protect habitats and species of Community interest through the establishment and conservation of an EU-wide network of sites known as Natura 2000. These are SACs and SPA’s designated under the Habitats Directive and Birds Directive (Conservation of Wild Birds Directive (79/409/ECC)).

In accordance with the requirements of the EU Habitats Directive (43/92/EEC) and EU Birds Directive (79/409/EEC), the impacts of the policies and objectives of all statutory land use plans, and proposed amendments to these, on certain sites that are designated for the protection of nature (Natura 2000 sites<sup>3</sup>), must be assessed as an integral part of the process of drafting of the plan. This is to determine whether or not the implementation of the proposed plan or its amendments could have negative consequences for the habitats or plant and animal species for which these sites are designated. This assessment process is called an Appropriate Assessment (AA) and must be carried out on all stages of the plan making process including; the draft Plan, any proposed amendments and the final Plan as adopted.

Articles 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans and projects likely to affect Natura 2000 sites. Article 6(3) establishes the requirement for Appropriate Assessment (AA):

*Article 6(3): “Any plan or project not directly connected with or necessary to the management of the [Natura 2000] site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subjected to an appropriate assessment of its implications for the site in view of the site’s conservation objectives. In light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”*

*Article 6(4): “If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, Member States shall take all compensatory measures necessary to ensure that the overall coherence of the Natura 2000 is protected. It shall inform the Commission of the*

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<sup>3</sup> Natura 2000 sites include Special Areas of Conservation designated under the Habitats Directive and Special Protection Areas designated under the Birds Directive. Special Areas of Conservation are sites that are protected because they support particular habitats and/or plant and animal species that have been identified to be threatened at EU community level. Special Protection Areas are sites that are protected for the conservation of species of birds that are in danger of extinction, or are rare or vulnerable. Special Protection Areas may also be sites that are particularly important for migratory birds. Such sites include internationally important wetlands.

*compensatory measures adopted. Where the site concerned hosts a priority natural habitat type and/or a priority species the only considerations which may be raised are those relating to human health or public safety, to the beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest."*

This document provides a record of the Appropriate Assessment process of the proposed amendments to the Draft Strandhill Mini-Plan of the Sligo County Development Plan 2011-2017.

## **Sligo County Development Plan 2011-2017**

Sligo County Development Plan came into force on 13 June 2011. It will remain operational for a period of maximum six years. The Plan sets out the Council's policies and objectives for the proper planning and sustainable development of the County of Sligo.

The undertaking of Appropriate Assessment (AA) is mandatory in the case of development plans. The AA of the CDP 2011-2017 was undertaken by environmental consultants CAAS on behalf of Sligo County Council. The resultant Appropriate Assessment Screening Report was published alongside the CDP 2011-2017.

The Appropriate Assessment informed the policies and objectives of the Plan and also suggested appropriate mitigation measures, which were incorporated in to the relevant chapters of the Plan upon its adoption in 2011.

This Natura Impact Report of the proposed amendments to the Draft Strandhill Mini-Plan should be read in conjunction with the CDP 2011-2017 and the associated Appropriate Assessment Screening Report.

Sligo CDP and its associated Appropriate Assessment Screening Report are available at [www.sligococo.ie/cdp](http://www.sligococo.ie/cdp).

## **1.2 Stages of the Appropriate Assessment**

This document has been prepared in accordance with the European Commission Environment DG document "*Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC*", referred to as the "EC Article 6 Guidance Document". The guidance document provides a non-mandatory methodology for carrying out assessments required under Article 6(3) and (4) of the Habitats Directive, and is viewed as an interpretation of the EU Commission's document "*Managing Natura 2000 sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC*", referred to as "MN2000". In addition, "*Appropriate Assessment Guidance for Planning Authorities*" was published by the Department of the Environment, Heritage and Local Government in December 2009 (DEHLG, 2009) and amended in March 2010. Cognisance has been taken of this document in carrying out this assessment. In complying with the obligations under Article 6(3) and with reference to the guidance documents mentioned above, this AA has been broadly structured as follows:

### **1) Stage 1 – Screening for Appropriate Assessment**

- Description of the plan;
- Identification of relevant Natura 2000 sites potentially affected;

- Identification and description of individual and cumulative impacts likely to result from implementation of the Plan;
- Assessment of the significance of the impacts identified above on site integrity. Exclusion of sites where it can be objectively concluded that there will be no significant effects.

## 2) Stage 2 –Appropriate Assessment

- Description of the Natura 2000 sites that will be considered further in the AA;
- Description of significant impacts on the conservation features of these sites likely to occur from the Plan;
- Mitigation Measures; and
- Conclusions.

## 3) Stage 3 – Assessment of Alternative Solutions

## 4) Stage 4 – Assessment where no alternative solutions exist and where adverse impacts remain (Imperative Reasons of Overriding Public Interest and Compensation Measures)

The Habitats Directive promotes a hierarchy of avoidance, mitigation and compensatory measures. In the first instance, the Plan should aim to avoid any negative impacts on European sites by identifying possible impacts early in the plan-making, and writing the plan in order to avoid such impacts. Following that, mitigation measures should be applied, if necessary, during the AA process to the point where no adverse impacts on the site(s) remain. If the Plan is still likely to result in adverse effects, and no further practicable mitigation is possible, then it is rejected. If no alternative solutions are identified and the Plan is required for imperative reasons of overriding public interest (IROPI test) under Article 6(4) of the Habitats Directive, then compensation measures are required for any remaining adverse effect.

### 4.2 Terminology

A number of different terms have been used in the recent past to describe the process and outputs associated with Article 6(3) of the Habitats Directive. These include Appropriate Assessment (AA), Habitats Directive Assessment (HDA), Habitats Directive Assessment Report, Natura Impact Statement (NIS), Natura Impact Report (NIR).

In an effort to provide consistency and transparency in the planning process and to come into line with the terminology used in the most recent DEHLG guidance, it has been decided to use just two terms throughout this document.

For the purposes of this report the following terms have been adopted:

- **Appropriate Assessment (AA)** has been used to refer to the process and includes the various stages outlined in Section 1.2 above.
- **Natura Impact Report (NIR)** has been used to refer to the output from the AA process and includes the information necessary for the competent authority to carry out an appropriate assessment of the implications of the Plan.

It should also be noted that the Sligo County Development Plan 2011-2017 also uses the term Habitats Directive Assessment (HDA) in addition to the term Appropriate Assessment to describe the process and outputs associated with Article 6(3) of the Habitats Directive. These terms are used interchangeably throughout the Sligo County Development Plan 2011-2017.

## **2 METHODOLOGY**

### **2.1 Approach**

Appropriate Assessment of the draft Mini-Plan proposed amendments was undertaken and the findings of the assessment are presented in this Natura Impact Report. The approach taken in the making of this assessment follows *European Communities, Assessment of plans and projects significantly affecting Natura 2000 sites, Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC, 2002*, and on *Local Government and Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities, 2009*. As the Mini-Plan progresses through the plan making process the appropriate assessment process will continue in tandem and will inform the decision making process in terms of any likely significant impacts arising from the Mini-Plan on Natura 2000 sites.

### **2.2 Data Sources**

The appropriate assessment of potential impacts on the integrity of Natura 2000 sites in this Natura Impact Report is based on a desktop review of information relating to these sites and to the habitats and species that they support. References and data used are cited in the back of this report.

### **2.3 Consultation**

This report will be placed on public display with the draft Mini-Plan proposed amendments and will be referred to Government Departments and other statutory consultees for consideration during the consultation process. Submissions on same will be taken into consideration in the drafting of the final plan and accompanying Appropriate Assessment Screening Statement or Natura Impact Report.

### **3 STAGE 1 – SCREENING FOR APPROPRIATE ASSESSMENT**

#### **3.1 Description of the Proposed Amendments to the Draft Strandhill Variation/Mini Plan**

The proposed amendments to the Draft Strandhill Variation/Mini Plan are outlined in Tables 4 and 5 of this document.

#### **3.2 Features of the Proposed Amendments that could impact on Natura 2000 Sites**

Impacts arising from the implementation of objectives of the draft plan which could cause significant impacts on the integrity and conservation objectives of Natura 2000 sites include activities which give rise to:

- direct impacts on habitats listed on Annex I of the Habitats Directive and for which the site is designated;
- reduction in the area of any habitats within the site;
- direct or indirect damage to the physical quality of the environment (e.g. water quality) in the Natura 2000 site;
- serious or ongoing disturbance to species or habitats for which the Natura 2000 site is selected (e.g. increased noise, illumination, human activity);
- direct or indirect damage to the size, characteristics or reproductive ability of populations of species for which the Natura 2000 site is designated;
- activities which interfere with mitigation measures put in place for other plans or projects.

All of the proposed amendments were reviewed as part of the screening process. Consideration was given to direct and indirect impacts which may arise from activities which could be encouraged by objectives contained in the draft plan. Such activities could include new residential, commercial, infrastructural, recreational or other development which may give rise to direct impacts on habitats or species (loss of habitat, disturbance to species); as well as activities which could have indirect impacts (e.g. activities which could affect water quality or hydrology which could in turn affect the status/health of populations of water dependant habitats or species).

#### **3.3 Brief Description and Identification of the Natura 2000 sites to be screened**

Four Natura 2000 sites were identified during the screening of the Draft Mini-Plan that could potentially be impacted by the draft Plan. These were:

- Ballysadare Bay Special Area of Conservation (Site Code 000622)
- Cummeen Strand/Drumcliff Bay Special Area of Conservation (Site Code 000627)
- Cummeen Strand Special Protection Area (Site Code 004035)
- Ballysadare Bay Special Protection Area (Site Code 004129)

Screening of the proposed amendments also focuses on these sites. Screening is based on a desktop review of information relating to these sites and to the habitats and species that they support. Figures 1 and 2 below provide the locations of the SACs and SPAs immediately adjoining or within the Plan boundary, respectively. These sites along with their qualifying interests are listed in Table 1 (SACs) and Table 2 (SPAs) below.

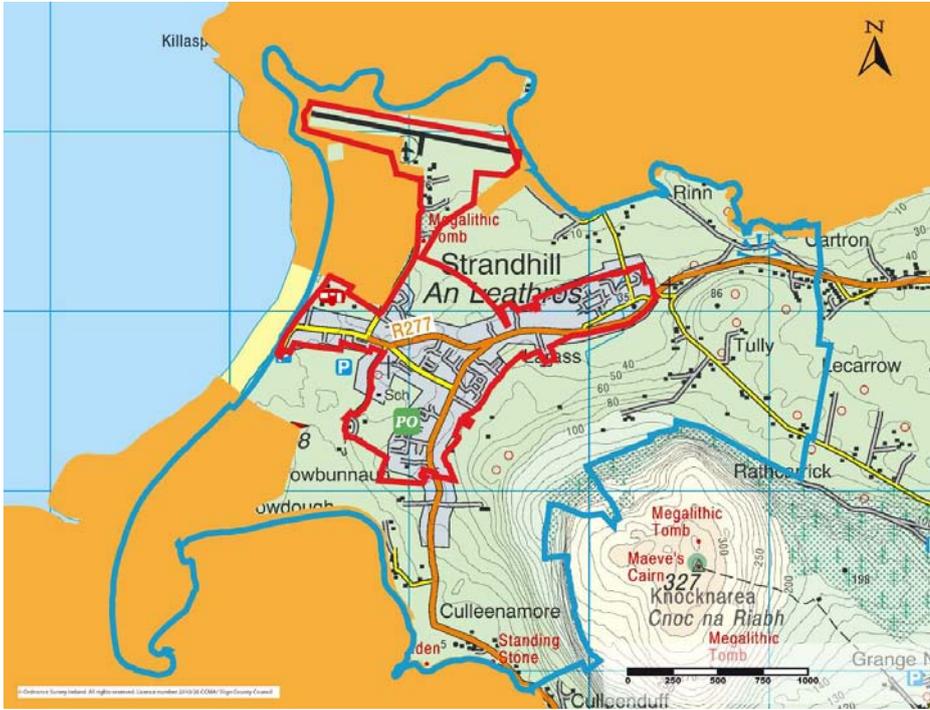


Fig. 1 Special Areas of Conservation immediately adjoining or within the Plan boundary.

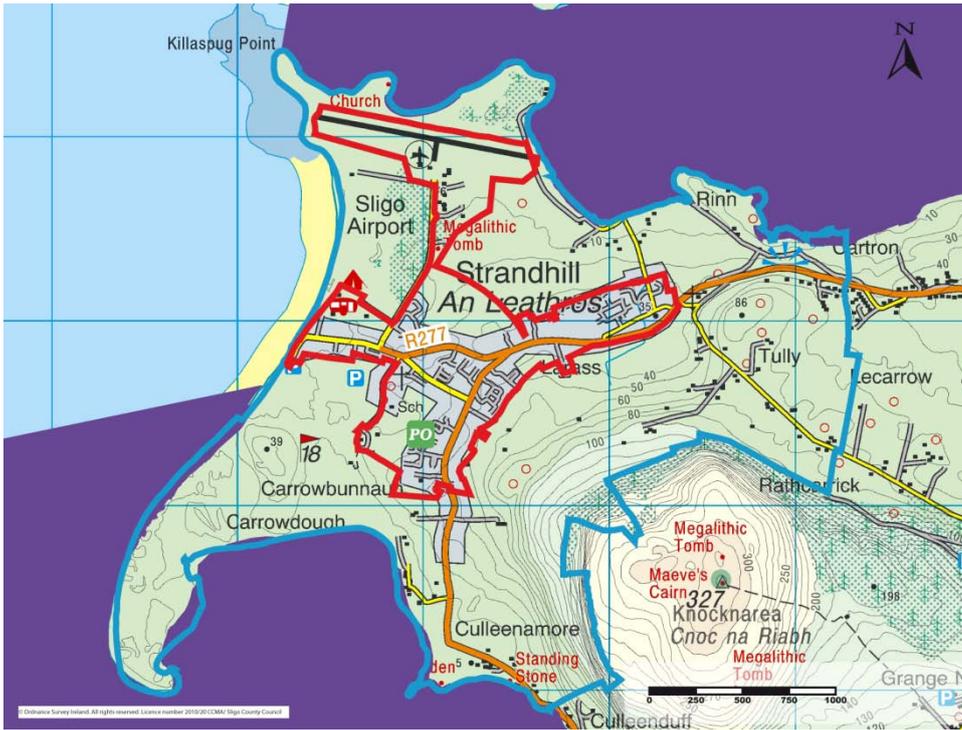


Fig.2 Special Protection Areas immediately adjoining or within the Plan boundary.

**Table 1 List of Natura 2000 sites (Special Areas of Conservation) immediately adjacent to Strandhill**

Site Code	Site Name	Qualifying Feature		Documented Potential Threats*
		Annex I Habitat	Annex II Species	
000622	Ballysadare Bay	Estuaries (1130), Mudflats and sandflats not covered by seawater at low tide (1140), Embryonic shifting dunes (2110), Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) (2120), *Fixed coastal dunes with herbaceous vegetation (grey dunes) (2130), Humid dune slacks (2190),	<i>Phoca Vitulina</i> (Common Seal) (1365), <i>Vertigo angustior</i> (Narrow-mouthed Whorl Snail) (1014).	Decrease in water quality/Increased pollution Development of marinas and ports Disturbance to marine mammals Dumping at sea Direct loss of habitat to development Recreational/amenity use Agricultural improvements/Reclamation Drainage/Changes in local hydrology including water abstraction Erosion (natural and anthropogenic) Agricultural abandonment Overgrazing/undergrazing Bracken and scrub encroachment Tourism related development Introduction of alien invasive species Illegal Dumping Burning Quarrying/removal of sand Aquaculture
000627	Cummeen Strand/Drumcliff Bay	Estuaries (1130), Mudflats and sandflats not covered by seawater at low tide (1140), Embryonic shifting dunes (2110), Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) (2120), *Fixed coastal dunes with herbaceous vegetation (grey dunes) (2130), *Petrifying springs with tufa formation (Cratoneurion) (7220), <i>Juniperus communis</i> formations on heaths or calcareous grasslands (5130).	<i>Phoca vitulina</i> (Common Seal) (1365), <i>Vertigo angustior</i> (Narrow-mouthed Whorl Snail) (1014).	Decrease in water quality/Increased pollution Development of marinas and ports Disturbance to marine mammals Dumping at sea Direct loss of habitat to development Recreational/amenity use Agricultural improvements/Reclamation Drainage/Changes in local hydrology including water abstraction Erosion (natural and anthropogenic) Agricultural abandonment Overgrazing/undergrazing Bracken and scrub encroachment Tourism related development Introduction of alien invasive species Illegal Dumping Burning Quarrying/removal of sand Aquaculture

**Note** Priority Habitats are present in Ireland and are present within the Natura 2000 Sites adjoining Strandhill. These are prefixed with an asterisk (for example, '\*Fixed Dunes (2130)') in **Table 3.1** and in subsequent tables in this report. The importance of Priority Habitat is emphasised at several places in the Directive (Articles 4 and 5 and Annex III), not only in terms of the selection of sites, but also in the measures required for site protection (Article 6).

**Table 2 List of Natura 2000 sites (Special Protection Areas) immediately adjacent to Strandhill**

Site Code	Site Name	Qualifying Feature Annex I Species	Documented Potential Threats*
004035	Cummeen Strand	Site is selected for: Light-bellied Brent Goose .  Additional Special Conservation Interests: Oystercatcher, Redshank, Wetland & Waterbirds	Direct and indirect impacts to the habitats of the bird species of conservation interests (loss of habitat) Direct loss of habitat to development Water quality/pollution Disturbance including recreation/amenity use Introduction of alien invasive species Illegal Dumping Persecution (Poisoning) Disturbance from Recreational/amenity use Inappropriate land management
004129	Ballysadare Bay	Site is selected for: Light-bellied Brent Goose and Bar-tailed Godwit.  Additional Special Conservation Interests: Grey Plover, Dunlin, Redshank, Wetland & Waterbirds.	Direct and indirect impacts to the habitats of the bird species of conservation interests (loss of habitat) Direct loss of habitat to development Water quality/pollution Disturbance including recreation/amenity use Introduction of alien invasive species Illegal Dumping Disturbance from Recreational/amenity use Inappropriate land management

### 3.4 Conservation Objectives

A Natura 2000 site's conservation objectives are defined by DAHG and are, "intended to ensure that the relevant Annex I habitats and Annex II species present on a site are maintained in a favourable condition" (DEHLG, 2010). The DEHLG guidelines state that, "The Conservation Objectives derive from the qualifying interests, the Natura 2000 standard data form, and the management plan for the site, with summary information also available in the site synopsis." Whilst the Natura 2000 standard data forms and site synopses do present details of the qualifying features of Natura 2000 sites, and list the generic threats to those features, they do not define the Conservation Objectives of the site.

For the purposes of this assessment, information on the Conservation Objectives for the sites has been gained from consultation with NPWS relating to the Border Regional Planning Guidelines and NPWS generic Conservation Objectives for Natura 2000 Sites where no Management Plan is yet available.

Generic Conservation Objectives for SPAs are as follows:

- To maintain the bird species of special conservation interest for which the SPA has been listed, at favourable conservation status.

For cSACs, generic Conservation Objectives are as follows:

- To maintain Annex I habitats and Annex II species for which the cSAC has been selected at favourable conservation status;
- To maintain the extent species richness and biodiversity of the entire site; and

- To establish effective liaison and co-operation with landowners, legal users and relevant authorities.

The favourable conservation status of a species can be described as being achieved when:

‘population data on the species concerned indicate that it is maintaining itself, and the natural range of the species is neither being reduced or likely to be reduced for the foreseeable future, and there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.’

Favourable conservation status of a habitat can be described as being achieved when:

‘its natural range, and area it covers within that range, is stable or increasing, and the ecological factors that 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 as defined below.’

### 3.5 Documented Threats to the Special Areas of Conservation

Documented threats to Habitats Directive Annex I habitats and Annex II species in Ireland are presented in the ‘Backing documents’ and ‘Form’ for each habitat and species which are available at: <http://www.npws.ie/en/PublicationsLiterature/HabitatsDirectiveReport07/>. Not all of these threats will apply to all cSACs in which these habitats and species are present; however gathering information on the documented perceived threats to the qualifying features of the sites (and therefore to the Conservation Objectives of the sites and the integrity of the sites) is an important prerequisite for assessing what are the ‘likely significant effects’ on the sites resulting from the Plan. No such information is available for Birds Directive Annex I bird species, and hence this method of inferring Conservation Objectives cannot be applied to SPAs.

**Table 1** presents details of those threats, identified by NPWS, which it is considered likely will apply to the SAC’s that are included in this assessment.

It is important to realise that many of these threats do not necessarily represent activities that occur within the boundary of the Natura 2000 site. This applies in particular to aquatic and marine features and systems which can be affected by impact sources that occur a large distance from the site.

### 3.6 Documented Threats to Special Protection Areas

Similar threats will apply to many of the SPAs that often correspond geographically to the cSACs. Generally speaking, the threats to the Annex I habitats and Annex II species of the cSAC will also apply to the Annex I bird species and bird populations in general that are the qualifying features of the SPAs. However, the birds that constitute the qualifying features of the SPAs are subject to a number of additional threats that do not generally apply to the qualifying features of the cSAC such as hunting pressure (both legal and illegal); and disturbance from noise and visual cues such as movement of pedestrians and vehicles.

**Table 2** presents a summary of the generalised threats to the SPAs relevant to the Strandhill Mini-Plan.

### 3.7 Likely Changes to the Sites

The possible impacts that might arise from the Mini-Plan have been examined in the context of a number of factors that could potentially affect the integrity of the Natura 2000 sites. **Table 3** below presents a summary of the findings of this exercise. **Tables 4 and 5** below provide the screening matrix for the proposed amendments to the Plan with an Appropriate Assessment Screening Response provided in each case. Those sites for which potential effects and impacts have been identified have been taken forward to Stage 2 Appropriate Assessment. Those for which no potential impacts are anticipated as a result of implementation of the Plan do not require Stage 2 Appropriate Assessment and are 'screened-out' at this stage of the assessment.

**Table 3 Potential Impacts of Proposed Amendments on Natura 2000 Sites**

Site Name	Reduction in Habitat Area	Disturbance to Key Species	Habitats or Species Fragmentation	Reduction in Species Density	Changes in Key Indicators of Conservation Value (Water Quality etc.)
Ballysadare Bay SAC	None	None	None	None	None
Cummeen Strand/Drumcliff Bay SAC	Potential Impacts	Potential Impacts	Potential Impacts	Potential Impacts	Potential Impacts
Cummeen Strand SPA	None	None	None	None	None
Ballysadare Bay SPA	None	None	None	None	None

### 3.8 Screening of Proposed Amendments

Amendments have been proposed to the text of the Draft Variation/Mini-Plan (narrative and several objectives) and also to the Zoning Map. The proposed amendments to the text of the Mini-Plan are shown in blue type [like this](#) for text proposed to be inserted. There is no proposal to delete text. The amendments to the Zoning Map are indicated by a **black outline** and are accompanied by the number of the corresponding amendment.

**Table 4** identifies the environmental consequences of the Managers Recommendations to the Draft Variation/Mini-Plan which were put before the Elected Members at a meeting on the 13 May 2013.

**Table 5** identifies the environmental consequences of the Elected Members proposed amendments to the Draft Variation/Mini-Plan which was put before the Elected Members at a meeting on the 13 May 2013.

**Table 4 PROPOSED AMENDMENTS - MANAGERS RECOMMENDATIONS – APPROPRIATE ASSESSMENT SCREENING**

Ref.	Proposed Amendments - Managers Recommendations	Potential for impact on Natura 2000 Sites
A-1	<p>Under the heading <b>Population and housing</b> (p. 1 of the Draft Mini-Plan), include the following paragraph:</p> <p><i>The Core Strategy of the CDP allocated to Strandhill 14.4 ha of greenfield land, which included (in 2012-2013) 4.03 ha of land with existing planning permission for residential development, comprising some 204 potential residential units. This equates to 10.37 ha which have been zoned for residential development in this Mini-Plan. Mixed-use lands are also included in the allocation based on an average of 65% residential development in the mix of uses.</i></p>	None
A-2	<p>In <b>Section 44.1 Landscape, natural heritage, open space</b>, modify <b>objective G</b> as follows:</p> <p><i>Provide for a number of incidental public open spaces whilst ensuring the protection of designated sites through screening for Appropriate Assessment, notably: ...</i></p>	None
A-3	<p>In <b>Section 44.2 Coastal protection</b>, modify <b>objective A</b> as follows:</p> <p><i>Prepare an integrated coastal management plan for Strandhill in consultation with relevant agencies and interested parties. This plan should address, inter alia, the existing and potential recreational uses of the area. The coastal management plan will ensure the protection of Natura 2000 sites through the Appropriate Assessment process.</i></p>	None

Ref.	Proposed Amendments - Managers Recommendations	Potential for impact on Natura 2000 Sites
A-4	<p>In <b>Section 44.2 Coastal protection</b>, modify <b>objective D</b> as follows:</p> <p><i>Maintain and review dune management to include, where necessary, appropriate fencing, boardwalks and public information boards, in consultation with the National Parks and Wildlife Service of the DAHG.</i></p>	None
A-5	<p>In <b>Section 44.4 Mixed-use zones</b>, modify <b>objective B</b> as follows:</p> <p><i>Discourage piecemeal, haphazard development and ensure the assembly and consolidated development of lands within the mixed-use zones on the basis of integrated design proposals/masterplans with appropriate pedestrian/cycle/vehicular links. Prospective developers shall have regard to the DECLG's Guidelines for Planning Authorities – Sustainable Development in Urban Areas (Cities, Towns and Villages) and to the DoT/DECLG Design Manual for Urban roads and Streets (2013).</i></p>	None
A-6	<p>In <b>Section 44.4 Mixed-use zones</b>, modify <b>objective D</b> as follows:</p> <p><i>Encourage the redevelopment of the Promenade 'Corner' on the sea front (MIX 1, Objectives Map) currently comprising shops, dwellings and a public open space, subject to any necessary coastal protection measures whilst ensuring the protection of designated sites through screening for Appropriate Assessment at project level.</i></p>	None

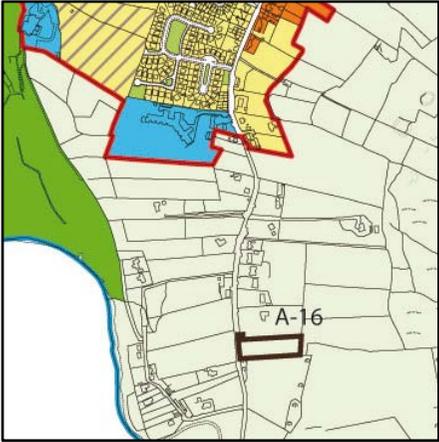
Ref.	Proposed Amendments - Managers Recommendations	Potential for impact on Natura 2000 Sites
A-8	<p>In <b>Section 44.5 Transport, circulation and parking</b>, modify <b>objective A</b> as follows:</p> <p><i>Reserve land for a New Airport Road linking the R292 to the existing Airport Road (R277) whilst ensuring the protection of designated sites through screening for Appropriate Assessment at project level.</i></p>	None
A-9	<p>In <b>Section 44.5 Transport, circulation and parking</b>, modify <b>objective C</b> as follows:</p> <p><i>Extend the Promenade in a northerly direction and link up with the existing Airport Road as indicated on the Objectives Map, to include for the upgrading of the existing lane from the caravan park to the Airport Road whilst taking full account of the need to protect the natural and cultural heritage of the coast and the need to avoid significant adverse impacts on Natura 2000 Sites and on species protected by law. All necessary coastal protection measures should be incorporated into such a project. This extension should be developed in a similar fashion to the existing Promenade whilst also preserving as much as possible of the seafront area as a public amenity.</i></p>	None
A-10	<p>In <b>Section 44.6 Community facilities</b>, modify <b>objective B</b> as follows:</p> <p><i>Require any development proposed on the greenfield site CF1 (refer to the Objectives Map) to ensure the protection of designated sites through screening for Appropriate Assessment at project level. Any proposed development should provide a range of facilities such as a citizens' advice point, social services, tourist information, skate park and indoor sports. A youth centre and childcare facilities may be provided within the same building or in a separate structure.</i></p>	None

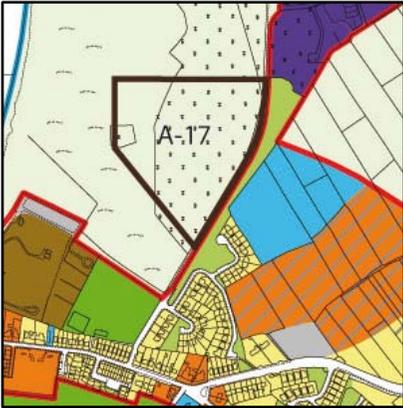
Ref.	Proposed Amendments - Managers Recommendations	Potential for impact on Natura 2000 Sites
A-12	<p>In <b>Section 44.7 Tourism development</b>, modify <b>objective A</b> as follows:</p> <p><i>Promote the development of tourism related-infrastructure and facilities within the village in order to increase visitor numbers and to create more local employment, <a href="#">subject to Appropriate Assessment under the Habitats Directive.</a></i></p>	None
A-13	<p>In <b>Section 44.7 Tourism development</b>, modify <b>objective B</b> as follows:</p> <p><i>Provide a public parking and picnic area to the north of the caravan park, in conjunction with the new road (See Section 44.5), <a href="#">subject to Appropriate Assessment under the Habitats Directive and the implementation of a Coastal Management Plan (Obj. 44.2 A) and a Management Plan for the Council lands at Killaspugbrone (Obj. 44.1 B).</a> This area will be located adjacent to the existing caravan park entrance, from where two-way traffic movements will operate (location marked TRANS 2 on the Objectives Map). In addition, adequate provision will be made for alternative circulation arrangements within the caravan park.</i></p>	None
A-14	<p>In <b>Section 44.9 Buffer zone</b>, modify <b>objective B</b> as follows:</p> <p><i>Require all new and replacement agricultural structures to be designed in such manner that they do not interfere with the character of the landscape, <a href="#">whilst ensuring the protection of designated sites through screening for Appropriate Assessment at project level.</a></i></p>	None

Ref.	Proposed Amendments - Managers Recommendations	Potential for impact on Natura 2000 Sites
A-15	<p>In <b>Section 44.10 Wastewater treatment</b>, modify <b>objective A</b> as follows:</p> <p><i>Upgrade the wastewater treatment plant at Killaspugbrone to cater for a population equivalent (PE) of circa 3,000, whilst ensuring the protection of designated sites through undertaking <a href="#">Appropriate Assessment at project level.</a></i></p>	None

**Table 5 PROPOSED AMENDMENTS – ELECTED MEMBERS – APPROPRIATE ASSESSMENT SCREENING**

Ref.	Proposed Amendments - Elected Members	Potential for impact on Natura 2000 Sites
A-7	<p>In <b>Section 44.4 Mixed-use zones</b>, modify objective G as follows:</p> <p><i>Require that any development proposal on village centre site MIX 2 (Council car park) incorporates the following:</i></p> <ul style="list-style-type: none"> <li><i>i. a pedestrian civic square, capable of being used for events and local markets;</i></li> <li><i>ii. pedestrian and possibly vehicular linkages to the Promenade to the west, behind existing development;</i></li> <li><i>iii. the location of any car parking behind the building line.</i></li> </ul> <p><i>In recognition of the scale, and strategic location of the Council car park, the only mixed use development permitted on this site will be the enhancement of the present car parking facility, a community centre and the provision of other recreational facilities.</i></p> <p><i>Terraced buildings up to three storeys shall be permitted, subject to appropriate ‘feathering’, to integrate with adjoining developments, from the council car park to the existing promenade &amp; in the existing promenade area. The community centre courtyard shall be designed to a high standard in a manner capable of enhancing the streetscape and complementing the existing village. However, any developments within the car park itself shall be restricted to two storeys.</i></p>	None

Ref.	Proposed Amendments - Elected Members	Potential for impact on Natura 2000 Sites
<p><b>A-11</b> (linked to A-17)</p>	<p>In <b>Section 44.6 Community facilities</b>, insert an additional <b>objective D</b> as follows:</p> <p><b><i>D. Land west of Airport Road, including pine plantation</i></b></p> <p><i>Sligo County Council owns most of the land and the pine plantation to the west of the Airport Road. Within the Southern portion of the afforested area (16.5 acres / 6.7 ha) it is an objective to accommodate sports and recreation, including any ancillary developments such as dressing rooms etc.</i></p> <p><i>Therefore the County Council-owned lands to the west of the Airport Road are zoned for 'Community, Sport &amp; Recreation' to meet this objective and public access will be retained &amp; enabled to continue.</i></p>	<p><b>Potential Impact – Negative</b></p> <p>Significant negative impacts would be expected to result from the proposed amendment arising from direct and indirect impacts on habitats (Annex I) and species (Annex II) listed in the Habitats Directive. Including:</p> <ul style="list-style-type: none"> <li>• Habitat loss and fragmentation.</li> <li>• Decrease in water quantity/quality, changes in local hydrology.</li> <li>• Increased pollution/erosion.</li> <li>• Disturbance to species or habitats (e.g. increased noise, illumination, human activity).</li> <li>• direct or indirect damage to the populations of species for which the Natura 2000 site is designated.</li> </ul>
<p><b>A-16</b></p>	<p>Change the zoning of the <b>site marked A-16</b> on the Proposed Amendments Map from 'buffer zone' to 'residential uses' and indicate on the Zoning Map that only one house is to be accommodated on the site.</p> 	<p>None</p>

Ref.	Proposed Amendments - Elected Members	Potential for impact on Natura 2000 Sites
<p><b>A-17</b> <b>(linked to A-11)</b></p>	<p>Change the zoning of the <b>site marked A-17</b> on the Proposed Amendments Map from 'buffer zone' to 'community, sports and recreation'</p> <p>[Note: the zoning category would be CF-community facilities, as per the Zoning Matrix included in the CDP]</p> 	<p><b>Potential Impact - Negative</b></p> <p>Significant negative impacts would be expected to result from the proposed amendment arising from direct and indirect impacts on habitats (Annex I) and species (Annex II) listed in the Habitats Directive.</p> <ul style="list-style-type: none"> <li>• Habitat loss and fragmentation.</li> <li>• Decrease in water quantity/quality, changes in local hydrology.</li> <li>• Increased pollution/erosion.</li> <li>• Disturbance to species or habitats (e.g. increased noise, illumination, human activity).</li> <li>• Direct or indirect damage to the populations of species for which the Natura 2000 site is designated.</li> </ul>
<p><b>A-18</b></p>	<p>Change the zoning of the <b>site marked A-18</b> on the Proposed Amendments Map from 'buffer zone' to 'residential uses'.</p> 	<p>None</p>

### 3.9 SCREENING CONCLUSION

The likely impacts that will arise from the proposed amendments to the Strandhill Mini-Plan have been examined in the context of the key environmental factors that could potentially affect the integrity of the Natura 2000 network, e.g. disturbance, habitat loss, etc. and the results of the Screening Assessment, as presented in **Tables 3, 4 and 5**. These tables indicate “None” for sites where no negative impact is anticipated on the Conservation Objectives or on the overall integrity of the site and “Potential Impact” for those sites where it is certain, likely or uncertain at this stage that impacts on the site may arise as a result of implementation of the Plan. Following the screening stage of the process, one SAC (Cummeen Strand/Drumcliff Bay cSAC) was brought forward for Stage 2 Appropriate Assessment (**Table 6**).

**Table 6 Summary of Sites Requiring Stage 2 Appropriate Assessment**

Site Name	Site Code	Requirement for Stage 2 Appropriate Assessment
Ballysadare Bay cSAC	000622	Not Required
Cummeen Strand/Drumcliff Bay cSAC	000627	Required
Cummeen Strand SPA	004035	Not Required
Ballysadare Bay SPA	004129	Not Required

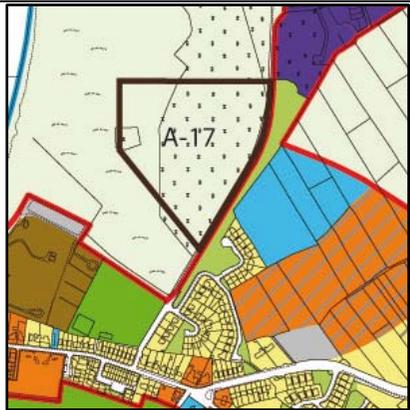
## **4. STAGE 2 –NATURA IMPACT REPORT**

### **4.1 Overview**

This section of the Natura Impact Report (NIR) records the Stage 2 Appropriate Assessment carried out on proposed amendments A-11 and A-17 to the Draft Strandhill Mini- Plan, as proposed by the Elected Members at a Council meeting in May 2013 (Table 7). One Natura 2000 site (Cummeen Strand and Drumcliff Bay cSAC) was brought forward for Stage 2 – Appropriate Assessment. Each of the above proposed amendments to the Draft Plan were reviewed with respect to the identified Natura 2000 site and an assessment was made of the effects of the proposed amendments on the integrity of the Natura 2000 site. Table 8 provides details of the Natura 2000 site and its qualifying interests.

**Table 7 Proposed Amendments to the Draft Strandhill Mini-Plan**

Ref.	Proposed Amendments - Elected Members	Potential for impact on Natura 2000 Sites
A-11	<p>In <b>Section 44.6 Community facilities</b>, insert an additional <b>objective D</b> as follows:</p> <p><b><i>D. Land west of Airport Road, including pine plantation</i></b></p> <p><i>Sligo County Council owns most of the land and the pine plantation to the west of the Airport Road. Within the Southern portion of the afforested area (16.5 acres / 6.7 ha) it is an objective to accommodate sports and recreation, including any ancillary developments such as dressing rooms etc.</i></p> <p><i>Therefore the County Council-owned lands to the west of the Airport Road are zoned for 'Community, Sport &amp; Recreation' to meet this objective and public access will be retained &amp; enabled to continue.</i></p>	<p><b>Potential Impact – Negative</b></p> <p>Significant negative impacts would be expected to result from the proposed amendment arising from direct and indirect impacts on habitats (Annex I) and species (Annex II) listed in the Habitats Directive.</p> <ul style="list-style-type: none"> <li>• Habitat loss and fragmentation.</li> <li>• Decrease in water quantity/quality, changes in local hydrology.</li> <li>• Increased pollution/erosion.</li> <li>• Disturbance to species or habitats (e.g. increased noise, illumination, human activity).</li> <li>• Direct or indirect damage to the populations of species for which the Natura 2000 site is designated.</li> </ul>
A-17	<p>Change the zoning of the <b>site marked YY</b> on the Proposed Amendments Map from 'buffer zone' to 'community, sports and recreation or caravan park with minimal tree removal'</p> <p>[Note: the zoning category would be CF-community facilities, as per the Zoning Matrix included in the CDP]</p>	<p><b>Potential Impact - Negative</b></p> <p>Significant negative impacts would be expected to result from the proposed amendment arising from direct and indirect impacts on habitats (Annex I) and species (Annex II) listed in the Habitats Directive.</p> <ul style="list-style-type: none"> <li>• Habitat loss and fragmentation.</li> <li>• Decrease in water quantity/quality, changes in local hydrology.</li> <li>• Increased pollution/erosion.</li> <li>• Disturbance to species or habitats (e.g. increased noise, illumination, human activity).</li> <li>• Direct or indirect damage to the populations of species for which the Natura 2000 site is designated.</li> </ul>



**Table 8 Natura 2000 Site(s) within Impact Zone and Qualifying Interests**

Site Code	Site Name	Qualifying Feature		Documented Potential Threats*
		Annex I Habitat	Annex II Species	
000627	Cummeen Strand/Drumcliff Bay	Estuaries (1130), Mudflats and sandflats not covered by seawater at low tide (1140), Embryonic shifting dunes (2110), Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) (2120), *Fixed coastal dunes with herbaceous vegetation (grey dunes) (2130), *Petrifying springs with tufa formation (Cratoneurion) (7220), <i>Juniperus communis</i> formations on heaths or calcareous grasslands (5130).	<i>Phoca vitulina</i> (Common Seal) (1365), <i>Vertigo angustior</i> (Narrow-mouthed Whorl Snail) (1014).	Decrease in water quality/Increased pollution Development of marinas and ports Disturbance to marine mammals Dumping at sea Direct loss of habitat to development Recreational/amenity use Agricultural improvements/Reclamation Drainage/Changes in local hydrology including water abstraction Erosion (natural and anthropogenic) Agricultural abandonment Overgrazing/undergrazing Bracken and scrub encroachment Tourism related development Introduction of alien invasive species Illegal Dumping Burning Quarrying/removal of sand Aquaculture

**Note** Priority Habitats are present in Ireland and are present within the Natura 2000 Sites adjoining Strandhill. These are prefixed with an asterisk (for example, '\*Fixed Dunes (2130)') in **Table 3.1** and in subsequent tables in this report. The importance of Priority Habitat is emphasised at several places in the Directive (Articles 4 and 5 and Annex III), not only in terms of the selection of sites, but also in the measures required for site protection (Article 6).

## 4.2 Likely Significant Effects of the Plan on the Conservation Objectives of the Natura 2000 site

Significant negative impacts would be expected to result from the proposed amendment arising from direct and indirect impacts on habitats (Annex I) and species (Annex II) listed in the Habitats Directive. Such impacts would include the following:

- Habitat loss and fragmentation.
- Decrease in water quantity/quality, changes in local hydrology.
- Increased pollution/erosion.
- Disturbance to species or habitats (e.g. increased noise, illumination, human activity).
- Direct or indirect damage to the populations of species for which the Natura 2000 site is designated.

The Conservation Objectives for the Cummeen Strand/Drumcliff Bay cSAC are as follows:

Objective: To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected:

- [1014] *Vertigo angustior*
- [1095] *Petromyzon marinus*
- [1099] *Lampetra fluviatilis*
- [1130] Estuaries
- [1140] Mudflats and sandflats not covered by seawater at low tide
- [1365] *Phoca vitulina*
- [2110] Embryonic shifting dunes
- [2120] Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes")
- [2130] \* Fixed coastal dunes with herbaceous vegetation ("grey dunes")
- [5130] *Juniperus communis* formations on heaths or calcareous grasslands
- [7220] \* Petrifying springs with tufa formation (*Cratoneurion*)

The proposed amendments will affect key habitats and species, which are qualifying interests of the Natura 2000 site, in the following way:

### **Fixed Coastal Dunes                      Annex I Priority Habitat**

- Habitat loss and fragmentation.
- Decrease in water quantity/quality, changes in local hydrology.
- Increased pollution/erosion.
- Disturbance to habitats (e.g. increased noise, illumination, human activity).

### **Narrow-Mouthed Whorl Snail (*Vertigo angustior*)                      Annex II Species**

- Habitat loss and fragmentation.
- Decrease in water quantity/quality, changes in local hydrology.
- Increased pollution/erosion.
- Disturbance to species (e.g. increased noise, illumination, human activity).
- Direct or indirect damage to the populations of species for which the Natura 2000 site is designated.

The integrity of the Natura 2000 (determined by structure and function and conservation objectives) is likely to be affected by the proposed amendments through loss of habitat and fragmentation, changes in hydrology, a decrease in water quantity and quality, and increased pollution and disturbance.

The permanent loss of priority Annex I habitat and likely changes to the hydrology of the Natura 2000 site from development arising from the proposed amendments to the Strandhill Mini-Plan are significant effects on the conservation objectives and integrity of the Natura 2000 site. Accordingly, mitigation measures are not considered in this report as no mitigation measures would address the adverse effect of the proposed amendments on the conservation objectives and integrity of the site.

### 4.3 Consultation with Environmental Authorities

Having regard to the criteria set out in Schedule 2A of the SEA Regulations 2004 and Part XAB of the Planning and Development Act (2010) on 28 May 2013 the Planning Authority determined that both strategic environmental assessment and appropriate assessment are required in respect of the aforementioned proposed amendments of the Draft Variation/Mini-Plan, Pursuant to S. 13(6)(a) of the Planning and Development Act 2000 (as amended).

The proposed amendments were screened for potential environmental effects.

A **Natura Impact Report of the Proposed Amendments to the Draft Plan** was prepared and circulated to the following environmental authorities on 28 June 2013:

- The Environmental Protection Agency (EPA)
- The Department of Communications, Energy and Natural Resources (DCENR)
- The Department of Environment, Community and Local Government (DECLG) and Department of Arts, Heritage and the Gaeltacht (DAHG)
- The Department of Agriculture, Fisheries and Food (DAFF)
- The local authorities adjoining the area under the jurisdiction of Sligo County Council

The **Natura Impact Report** concluded that:

The proposed interconnected amendments A-11 and A-17 have the potential for significant effects on the integrity of the Cummeen Strand/Drumcliff Bay SAC (site code 000627).

The adoption of the proposed amendments A-11 and A-17 would conflict with the *Habitats Directive Assessment (Appropriate Assessment)* and the related *European and national designated natural heritage sites objectives* included in the same section of the Sligo County Development Plan 2011-2017.

#### 4.3.1 Response of the EPA

The EPA responded on **15 July** with the following specific comments:

- A. It is noted that the SEA Screening report identifies that Proposed Amendment A-11 and A-17 in particular, as having have potential for likely significant negative effects to Cummeen Strand/Drumcliffe Bay SAC. **Clarification should be given as to whether an**

**option not to proceed with A-11 and A-17 has been considered taking into account the Habitats Directive ‘Precautionary Principle’.**

- B. In addition, you are referred in *Circular Letter SEA 1/08 & NPWS 1/08*, to the following:
- “In any case where, following screening, it is found that the draft plan or amendment may have an impact on the conservation objectives of a Natura 2000 site or that such an impact cannot be ruled out, adopting a precautionary approach-*
- an appropriate assessment of the plan must be carried out and*
  - in any case where a strategic environmental assessment (SEA) would not otherwise be required, it must also be carried out”*
- C. It should be ensured that consultation is carried out with the NPWS on the scope of the Appropriate Assessment.
- D. Clarification should also be given whether *Proposed Amendment A-16* is in keeping with the principles of sustainable development and seeking to avoid/discourage ribbon development. The Plan should seek to ensure that the Core Strategy approach, as advocated by the Regional Planning Guidelines, is incorporated as appropriate.

**Planning Authority’s comments:**

- A. It is noted that the decision as to whether to proceed with A-11 and A-17 is a reserved function of the elected members of Sligo County Council. The Executive of the Council can only make a recommendation in this respect. The Natura Impact Report and SEA Screening Report with its present Addendum on the Proposed Amendments have been prepared not only because the legislation so requires, but with the purpose of helping the elected members make an informed decision before adopting the Variation/Mini-Plan with or without amendments.
- B. The reference is noted. An appropriate assessment has been carried out and its outcome is presented in the updated Natura Impact Report that accompanies the Proposed Amendments on public display.

A Strategic Environmental Assessment has already been carried out for the County Development Plan. The present Draft Variation, as prepared by the Planning Section of Sligo County Council, was accompanied by a SEA Screening Report, which found that the CDP, as varied, would not have any significant impacts on the environment.

The Proposed Amendments to the Draft Variation have, indeed potential for significant effects on the environment, i.e. on the Cummeen Strand/Drumcliff Bay SAC (site code 000627). The adoption of the proposed amendments A-11 and A-17 would conflict with the **Section 7.1.2 Habitats Directive Assessment (Appropriate Assessment)** and the related **European and national designated natural heritage sites objectives** included in the same section of the Sligo County Development Plan 2011-2017.

However, the potential impact of the “community, sports and recreation” zoning on the site subject to the proposed amendments A-11 and A-17 could, theoretically, be prevented through the rigorous application of relevant County Development Plan provisions contained in **Section 7.1.2 Habitats Directive Assessment (Appropriate Assessment)** (p. 89-90 of the CDP) and the related **European and national designated natural heritage sites objectives** included in the same section.

Therefore, it is considered that the preparation of an Environmental Report in relation to the Proposed Amendments is not warranted at this stage, as the CDP already includes policies designed to prevent such negative impact on the environment.

- C. Consultation with the NPWS of the DAHG has taken place.
- D. The assessment of A-16 under Section 2.2 of this report indicates the following:

Strandhill Mini-Plan is designed to implement the CDP's general policies and objectives, including landscape protection objectives and the policy discouraging ribbon development and urban sprawl. For these reasons, the subject site and surrounding area have been designated as buffer zone.

The adoption of the proposed amendment A-16 would conflict with the above-mentioned provisions of the CDP and may result in a negative visual impact on the scenic landscape at the foot of the Knocknarea Mountain. However, the proposed amendment is unlikely to have any significant effects on the environment and, if adopted, would not change the conclusion of the initial SEA Screening.

It is considered that no further clarification is necessary.

#### **4.3.2 Response of Leitrim County Council**

**Leitrim County Council replied on 16 July** as follows:

This Authority is happy to rely on your offices to ensure that the proposed Variation would, if adopted, comply with the proper planning and sustainable development of the area and in particular with the requirements of the Habitats Directive and Strategic Environmental Requirements.

It is noted by reference to the SEA and Habitat Reports that **certain amendments would, if adopted, give rise to significant environmental impacts and would conflict with the requirements of the Habitats Directive.**

**Were such a conflict remain unresolved, this Authority would have serious reservations about the adoption of any such amendments. As you are aware, any decision to proceed with an amendment that would compromise the integrity of the qualifying interests of a Natura 2000 site would raise serious legal issues and may expose the Council to significant costs.**

#### **Planning Authority's comments:**

The response of Leitrim County Council is noted and agreed.

#### **4.3.3 Response of the DCENR**

**The Geological Survey of Ireland, part of the DCENR,** replied on **18 July** with an acknowledgement of the County Council's notification of 28 June. The GSI provided information and links to datasets relating to geological heritage sites. The GSI indicated that any complementary data collected by Sligo County Council regarding karst areas should be forwarded to the Department for inclusion in the national datasets.

The GSI did not make any specific reference to the Proposed Amendments of the Draft CDP Variation/Strandhill Mini-Plan.

#### Planning Authority's comments:

The response of the DCENR/GSI is noted. No geological field data has been collected as part of the environmental or appropriate assessment of the Draft Variation or its proposed amendments.

#### 4.3.4 Response of the DAHG

The DAHG replied on **23 July** as follows:

- A. In relation to the Addendum to the SEA Screening Report, the conclusion states that '*the proposed interconnected amendments A-11 and A-17 have the potential for significant effects on the environment, i.e. on the Cummeen Strand/Drumcliff Bay SAC (site code 000627)*'. In light of this conclusion, proceeding to full SEA for the proposed Amendments may be required. Please consult with the Environmental Protection Agency (EPA) for clarification on this issue.
- B. In relation to the Natura Impact Report, the Department notes the Elected Members proposed amendments A-11 and A-17 to the Draft Strandhill Mini-Plan. The Department has had previous discussions regarding the development of a sports community facility within the Special Area of Conservation at this location. Most of the habitat at this location has been modified (conifer plantation) and does not correspond to Annexed habitat (Annex I of the EU Habitats Directive, Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora). However, the Department recognises that this area is entirely within the Special Area of Conservation. The present habitat has the potential to be fully restored into dune habitat, i.e. Fixed Dunes with Herbaceous Vegetation (Grey Dunes), which is listed as priority habitat in the EU Habitats Directive. It should also be noted, that the present degraded/modified habitat supports the species Narrow-mouthed Whorl Snail (*Vertigo angustior*), which is a species listed in Annex II of the EU Habitats Directive and is a qualifying feature for the Cummeen Strand/Drumcliff Bay Special Area of Conservation Site No. SAC 000627. This area also supports the protected flora species Round-leaved Wintergreen subsp. *maritima* (*Pyrola rotundifolia maritima*), which is a species listed in the Flora Protection Order, 1999 (SI No. 94 of 1999). **The Department notes the conclusion of the Natura Impact Report, i.e. the proposed amendments may result in adverse impacts on the integrity of the Cummeen Strand/Drumcliff Bay Special Area of Conservation Site No. SAC 000627, a Natura 2000 site. The Department supports the approach of Sligo County Council in relation to this assessment and believes that this conclusion is in line with the conservation objectives of the Cummeen Strand/Drumcliff Bay Special Area of Conservation Site No. SAC 000627.**

#### Planning Authority's comments:

- A. Noted. Consultation with the EPA has taken place.
- B. The detailed response and the Department's support of Sligo County Council's approach are noted and agreed.

#### 4.4 Conclusion

This Natura Impact Report presents the findings of a Stage 2 Appropriate Assessment undertaken on the proposed amendments to the Draft Strandhill Mini-Plan.

The Appropriate Assessment Screening (Stage 1) identified that there was potential for likely significant effects arising from the adoption and implementation of the proposed amendments (A-11 and A-17) to the Draft Mini-Plan. Accordingly, Stage 2 Appropriate Assessment (this Natura Impact Report) was undertaken to identify potential likely significant effects on Natura 2000 sites arising from the proposed amendments to the Draft Mini-Plan.

Consultation with the environmental authorities and particularly the Department of Arts, Heritage and the Gaeltacht and the Environmental Protection Agency highlight the potential for adverse impact on the Cummeen Strand/Drumcliff Bay Natura 2000 site arising from proposed amendments A-11 and A-17.

The adoption of the proposed amendments A-11 and A-17 would conflict with Section 7.1.2 *Habitats Directive Assessment (Appropriate Assessment)* and the related *European and National Designated Natural Heritage Sites Objectives* included in the same section of the Sligo County Development Plan 2011-1017.

Furthermore, the adoption of the Draft CDP Variation/Mini-Plan with the amendments A-11 and A-17 would contravene Section 177. V(c) of the Planning and Development Act 2000 (as amended), which specifies that planning authorities shall make a land use plan only after having determined that the said plan would not adversely affect the integrity of a European site.

**Accordingly, on the basis of the Precautionary Principle, it can be objectively concluded that adverse impacts of the proposed amendments on the integrity of the Cummeen Strand/Drumcliff Bay Natura 2000 site remain and that the proposed amendments A-11 and A-17 should not be adopted as part of the CDP Variation/Strandhill Mini-Plan.**

## 5. References

Environment, Heritage and Local Government, National Parks and Wildlife Service. 2008. The Status of EU Protected Habitats and Species in Ireland.

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European Communities. 2002. Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. Luxembourg.