



HABITATS DIRECTIVE APPROPRIATE ASSESSMENT SCREENING AND NATURA IMPACT STATEMENT (STAGE 2):

IN RELATION TO: PROPOSED TOURISM FACILITIES TO INCLUDE:
8 NO. CABINS WITH RECEPTION;
CAFÉ, DESIGN STUDIO AND CRAFT SHOP
(HOUSED WITHIN EXISTING BUILDING);
WOODLAND PARK WITH PLAYGROUND AND PUMP TRACK
NATURE SPA INCLUDING TREATMENT ROOMS, SAUNA,
SEAWEED BATHS;
SURF EQUIPMENT HIRE AND LESSONS;
CAR PARKING;
AND ALL ASSOCIATED SITE WORKS AT CLOONTYROCKLIS,
GRANGE, CO. SLIGO

Client: Mr. Brendan Ward
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Site Location: Cloontyrocklis,
Grange,
Co. Sligo.

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1. Introduction

1.1 Preamble

Mr. Freddie Symmons - B.Env. Sc. (HONS) M.C.I.E.E.M *Senior Environmental Consultant and Ecologist* of Kingfisher Environmental Consultants and a *Full Member of the Chartered Institute of Ecology and Environmental Management* has been engaged by Mr. Brendan Ward to carry out and prepare an Appropriate Assessment Screening and a Stage 2 Natura Impact Statement (NIS) in relation to a:

Proposed Tourism facilities to include: 8 no. cabins with reception; café, design studio and craft shop (housed within existing building); woodland park with playground and pump track; nature spa including treatment rooms, sauna, seaweed baths; surf equipment hire and lessons; car parking; and all associated site works at Cloontyrocklis, Grange, Co. Sligo

With the introduction of the Birds Directive in 1979 and the Habitats Directive in 1992 came the obligation to establish the Natura 2000 network of sites of highest biodiversity importance for rare and threatened habitats and species across the EU. In Ireland, the Natura 2000 network of European sites comprises Special Areas of Conservation (SAC's) and Special Protection Areas (SPA's).

Appropriate Assessment (AA) involves a case-by-case examination of the implications of a development for the Natura 2000 site and its conservation objectives. This may be presented in the form of a Natura Impact Statement. In general terms, implicit in Article 6(3) of the Habitats Directive is an obligation to put concern for potential effects on Natura 2000 sites at the forefront of every decision made in relation to plans and projects at all stages.

Each step in the assessment process precedes and provides a basis for other steps. The results at each step must be documented and recorded carefully so there is full traceability and transparency of the decisions made. They also determine the decisions that ultimately may be made in relation to approval or refusal of a plan or project. AA is not a prohibition on new development or activities but involves a case-by-case examination of the implications for the Natura 2000 site and its conservation objectives.

In the preparation of this report, careful attention has been made to fully document and reference all the site selection and suitability assessment procedures as they chronologically occurred. This is in accordance with the principles of Appropriate Assessment.

This report takes cognisance of the Kelly v An Bord Pleanala Case 2014 IEHC 400 which determined that conclusions must be capable of removing all reasonable scientific doubt as to whether a development may have significant effects on Natura 2000 sites.

Potential impacts from the proposed work activities, which may affect designated sites (Natura 2000) are also considered. This report details the findings of Stage 2: Appropriate Assessment Natura Impact Statement with a summary of the Stage 1 AA Screening Findings.

1.2 Statement of Authority

This report has been prepared by an experienced Senior Environmental Consultant and Ecologist with over **28 years** professional experience going back as far as 1993. The author is a *Full Member of the Chartered Institute of Ecology and Environmental Management* and has prepared in excess of 100 Appropriate Assessment Screening and NIS reports in Ireland and in excess of 50 EIS and EIAR Reports. The author visited the site and carried out a habitat assessment and walk over survey on 12th March 2023.

The author has first hand knowledge of the ecology of this area of County Sligo, having prepared several appropriate assessment screening reports around Grange Village including



an Appropriate Assessment Screening Report within the same townland located ca. 1 km west of the proposed application site.

1.3 Methodology for Appropriate Assessment

1.3.1 Stage One - Screening for Appropriate Assessment

The Habitats Directive does not set out clear guidance on the exact format that a screening exercise for an appropriate assessment should follow. However, there is guidance provided in carrying out a Screening Report.

- Environment Heritage and Local Government: *Circular L8/08 Water Services Investment and Rural Water: Protection of Natural Heritage and National Monuments Programmes*. This is outlined on pages 30 – 35 of the Environment Heritage and Local Government publication: *Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities*, Published 10 December 2009.
- Environmental Protection Agency (n.d.) *Waste Water Discharge Licensing - Appropriate Assessment - Note on Appropriate Assessments for the purposes of the Waste Water Discharge (Authorisation) Regulations, 2007 (S.I. No. 684 of 2007)* Wexford, EPA.
- Office of the Planning Regulator Practice Note PN01 Appropriate Assessment Screening for Development Management, March 2021

In the first document, screening for appropriate assessment involves the following:

Description of Plan or Project

The first element is a description of the plan or project, including its nature, size and location, and possible or likely effects, and draft policies, objectives, land use zonings and associated strategies in the case of plans.

Natura 2000 Sites

The second element is an examination of what Natura 2000 sites may be affected.

The zone of influence of a proposed development is the geographical area over which it could affect the receiving environment in a way that could have significant effects on the Qualifying Interests of a European site. This should be established on a case-by-case basis using the Source-Pathway-Receptor framework and not by arbitrary distances (such as 15 km) – (Source: *Office of the Planning Regulator Practice Note PN01 Appropriate Assessment Screening for Development Management, March 2021*).

The identification of European sites within a 15km zone has become common practice in screening projects for AA. However, this approach is not based on the S-P-R model and should not be used for projects. Few projects have a zone of influence this large, but some more complex projects may require a greater zone of investigation. Instead the zone of influence of a project should be considered using the Source-Pathway-Receptor model. This should avoid lengthy descriptions of European sites, regardless of whether they are relevant to the proposed development, and a lack of focus on the relevant European sites and issues of importance.

Site synopses, which are summary descriptions of the key conservation interests of sites, and SAC datasheets with lists of qualifying interests for these sites are available from the NPWS website: www.npws.ie.

Assessment of Likely Effects

The task of establishing whether the plan or project is likely to have an effect on a Natura 2000 site or sites is based on a preliminary impact assessment using available information and data, including that outlined above, and other available environmental information (e.g.



water quality data), supplemented as necessary by local site information and ecological surveys. This is followed by a determination of whether there is a risk that the effects identified could be significant. This need not be a lengthy exercise. A precautionary approach is fundamental and, in cases of uncertainty, it should be assumed the effects could be significant. Examples of significance indicators from Commission guidance (EC, 2002) are listed in the table below; this document also summarises four case study examples of assessment of significance outcomes for projects. As a guide, any element of a plan or project that has the potential to affect the conservation objectives of a Natura 2000 site, including its structure and function, should be considered significant (EC, 2006).

Impact type	Significance indicator
Loss of habitat area	Percentage of loss
Fragmentation	Duration or permanence, level in relation to original extent
Disturbance	Duration or permanence, distance from site
Species population density	Timescale for replacement
Water resource	Relative change
Water quality	Relative change in key indicative chemicals and other elements

Examples of significance indicators (from EC (2002), Box 4)

Some examples of effects that are likely to be significant are:

- Any impact on an Annex I habitat
- Causing reduction in the area of the habitat or Natura 2000 site
- Causing direct or indirect damage to the physical quality of the environment (e.g. water quality and supply, soil compaction) in the Natura 2000 site
- Causing serious or ongoing disturbance to species or habitats for which the Natura 2000 site is selected (e.g. increased noise, illumination and human activity)
- Causing direct or indirect damage to the size, characteristics or reproductive ability of populations on the Natura 2000 site
- Interfering with mitigation measures put in place for other plans or projects

As the underlying intention of the in-combination provision is to take account of cumulative effects, and as these effects often only occur over time, plans or projects that are completed, approved but uncompleted, or proposed (but not yet approved) should be considered in this context (EC, 2002). All likely sources of effects arising from the plan or project under consideration should be considered together with other sources of effects in the existing environment and any other effects likely to arise from proposed or permitted plans or projects.

Screening Conclusion and Statement

The findings and conclusions of the screening process should be documented, with the necessary supporting evidence and objective criteria. This is of particular importance in cases where the AA process ends at the screening stage because the conclusion is that no significant effects are likely. Screening can result in the following possible conclusions or outcomes:

1. AA is not required. Screening, followed by consultation and agreement with the NPWS, establishes that the plan or project is directly connected with or necessary to the nature conservation management of the site.

2. No potential for significant effects/AA is not required. Screening establishes that there is no potential for significant effects and the project or plan can proceed as proposed. However, no changes may be made after this as this will invalidate the findings of screening.



Documentation of the AA screening process, including conclusions reached and how decisions were made, must be kept on file.

3. Significant effects are certain, likely or uncertain. The plan or project **must either proceed to Stage 2 (AA), or be rejected.** Rejection of a plan or project that is too potentially damaging and/or inappropriate ends the process and negates any need to proceed to Stage 2 (AA). Another possible option is to recommence the screening process with a modified plan or project that removes or avoids elements that posed obvious risks. This highlights the important process of screening a plan or project when new alternatives that may not have any impact are being considered. However, repeated or complicated screening exercises are not recommended as they point to the risk of significant effects and the need for Stage 2 (AA). The safeguards set out in Article 6(3) and (4) of the Habitats Directive are triggered not by certainty but by the possibility of significant effects. Thus, in line with the precautionary principle, it is unacceptable to fail to undertake an appropriate assessment on the basis that it is not certain that there are significant effects.

The following document has been used as guidance in compiling this screening report:

- Environmental Protection Agency (n.d.) *Waste Water Discharge Licensing - Appropriate Assessment - Note on Appropriate Assessments for the purposes of the Waste Water Discharge (Authorisation) Regulations, 2007 (S.I. No. 684 of 2007)* Wexford, EPA.

In this document, screening for appropriate assessment involves the following:

Step 1: Management of the site

Is the project directly connected with or necessary to the management of the site?

Step 2: Description of the project or plan

Identify all the elements of the project or plan alone or in combination with other plans or projects that have the potential for having significant effects on the site. The geographical scope of the plan or project as well as the European Sites that may be affected must be identified. The European Site or Sites that could be affected should be described.

A project may not in itself have a significant effect on a European Site, however, in combination with other plans or projects (existing and planned) it may result in a significant effect on a European Site.

Step 3: Characteristics of the site

This step requires identification of the impacts of the project on a European Site by characterising the site as a whole or those areas where impacts are most likely to occur. In addition to consideration of the cumulative effects on a European Site, consideration must also be given to direct, indirect, short and long-term, isolated and interactive effects.

Step 4: Assessment of significance

The assessment of the likelihood of significant effects of a proposed or existing plan or project on a European Site should be completed. If no significant effects are likely then no further assessment is required prior to the authorisation of the plan or project. There must be no reasonable scientific doubt that the plan or project does not have an effect on a European Site. This decision should be reasoned and recorded. If significant effects are likely then an appropriate assessment must be carried out. In addition, if the likelihood of significant effects is in doubt then the *precautionary principle* applies and an appropriate assessment must be carried out.



1.3.2 Stage Two: Appropriate Assessment

This is the consideration of the impact of the project or plan on the integrity of the Natura 2000 site, either alone or in combination with other projects or plans, with respect to the site's structure and function and its conservation objectives. The competent Authority drafts the AA.

1.3.3 Stage Three: Assessment of Alternative Solutions

This is the process which examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the Natura 2000 site.

1.3.4 Stage Four: Imperative Reasons of Overriding Public Interest (IROPI)

Stage 4 of Appropriate Assessment is the main derogation process of Article 6(4) of the Habitats Directive which examines whether there are imperative reasons of overriding public interest (IROPI) for allowing a plan or project that will have adverse effects on the integrity of a Natura 2000 site to proceed in cases where it has been established that no less damaging alternative solution exists. This stage requires an affirmative answer to both of the questions below in order for a plan or project to go ahead in the absence of alternative solutions.

- Are there imperative reasons of overriding public interest?
- Are there human health or safety considerations or important environmental benefits?

1.3.5. References

The following references and source material have been referred to our used in the preparation of this screening assessment and Stage 2: Natural Impact Statement (NIS):

- 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 (2001)
- Birds Directive (79/409/EEC)
- Environment Heritage and Local Government (10 December 2009) Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities, Dublin.
- Environment Heritage and Local Government (March 11 2010) Circular NPW 1/10 & PSSP 2/10: Appropriate Assessment under Article 6 of the Habitats Directive: guidance for Planning Authorities, Dublin.
- Environment Heritage and Local Government: Circular L8/08 Water Services Investment and Rural Water: Protection of Natural Heritage and National Monuments Programmes
- Environmental Protection Agency (n.d.) Waste Water Discharge Licensing - Appropriate Assessment - Note on Appropriate Assessments for the purposes of the Waste Water Discharge (Authorisation) Regulations, 2007 (S.I. No. 684 of 2007) Wexford, EPA.
- Environmental Protection Agency (2000) Managing Natura 2000 Sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC, Wexford, EPA.
- European Communities (Natural Habitats) Regulations, 1997 (S.I. No. 94 of 1997) (which has been amended twice, S.I. No. 233 of 1998 & S.I. No. 378 of 2005).
- Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC. Clarification of the concepts of: Alternative solutions, imperative reasons of overriding public interest, compensatory measures, overall coherence, opinion of the Commission (2007)
- The European Commission published guidance on Article 6 of the Habitats Directive, including on Appropriate Assessment Screening. Assessment of plans and projects significantly affecting Natura 2000 sites (November 2001) and Managing Natura 2000 sites: The provisions of Article 6 of the 'Habitats' Directive (2018).
- Habitats Directive (92/43/EEC)



- National Parks and Wildlife Service Website – www.npws.ie: Site Synopsis and Mapping Data for Natura 2000 Sites.
- Waste Water Discharge (Authorisation) Regulations, 2007 (S.I. No. 684 of 2007)
- High Court: Uí Mhuirín v. MHPLG [2019] IEHC 824
- Sweetman v ABP [2020] IEHC 39
- Kelly v. An Bord Pleanála (Aldi Stores) [2019] IEHC 84
- Heather Hill Management v. An Bord Pleanála and Burkeway Homes [2019] IEHC 186 and 450 Court of Justice of the European Union (CJEU):
- C-258/11 - Sweetman and Others v ABP (Galway Bypass)
- C-258/11 - AG opinion, Sweetman and Others v ABP (Galway Bypass)
- C-127/02 - Waddenzee
- C-521/12 - T.C. Briels and Others v Minister van Infrastructuur en Milieu
- C-323/17 - People Over Wind and Sweetman v. Coilte Teoranta
- Managing Natura 2000 Sites – The provisions of Article 6 of the ‘Habitats’ Directive 92/43/EEC (updated 2018)
- Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (2009)
- Office of the Planning Regulator Practice Note PN01 Appropriate Assessment Screening for Development Management, March 2021

2. SCREENING FOR APPROPRIATE ASSESSMENT

2.1 Introduction

Screening for Appropriate Assessment is the first stage and critical test of Appropriate Assessment and the question is asked whether the development is considered to have a significant impact on a designated Natura 2000 site. The purpose of screening is to determine, on the basis of a preliminary assessment and objective criteria, whether:

- i) a plan or project is directly connected to or necessary for the management of the site, and
- ii) whether a plan or project, alone and in combination with other plans or projects, could have significant effects on a Natura 2000 site in view of the site's conservation objectives.

As most projects will not be related to point (i) above, this will virtually always be irrelevant but with regards to point (ii) if the answer is no then the process is complete and full appropriate assessment is not required. Screening therefore is the process that addresses and records the reasoning and conclusions in relation to the first two tests of Article 6(3) of the Habitats Directive.

Screening **should be undertaken without the inclusion of mitigation**, unless potential impacts clearly can be avoided through the modification or redesign of the plan or project, in which case the screening process is repeated on the altered plan. This report takes cognisance of the Kelly v An Bord Pleanála Case 2014 IEHC 400 which determined that conclusions must be capable of removing all reasonable scientific doubt as to the effects on Natura 2000 sites.

2.2 Screening Process

2.2.1 Step 1: Management of the site

Question: Is the plan or project directly connected with or necessary to the management of the Natura 2000 site?

Answer: **No**



2.2.2 Step 2: Description of the project or plan

2.2.2.1 Site Development Summary

The development will consist of:

Proposed Tourism facilities to include: 8 no. cabins with reception; café, design studio and craft shop (housed within existing building); woodland park with playground and pump track; nature spa including treatment rooms, sauna, seaweed baths; surf equipment hire and lessons; car parking; and all associated site works at Cloontyrocklis, Grange, Co. Sligo.

The design proposal is to create multi-dimensional tourism facilities on the site, that will provide unique hospitality accommodation for the area. It will incorporate a spa with treatment rooms, sauna and seaweed baths, alongside water sports hire facilities. It will display the crafts of the local area, provides a nature trail, park and cafe for the community and tourism.

The proposal will be designed to be sensitive and respectful to the surrounding area, while providing new amenities, enhancing tourism potential for the village of Grange. Breathing new life into old walls will allow them to remain in place, enhancing the village and surrounding area. The proposed development will include:

- 8 no. Cabins with reception
- Café, design studio and craft shop (housed within existing building)
- Woodland park with playground and pump track
- Nature Spa including treatment rooms, sauna, seaweed baths
- Surf equipment hire and lessons
- Car Parking

The design intent is to create as little intervention as possible, to conserve the existing vernacular shed building, while minimising the impact of the new cabins and spa & water sports facilities on the surrounding landscape.

2.2.2.2 Site Location Overview and Existing Description

It is proposed to locate the facility at a ca. 1.05 hectare site at Cloontyrocklis, Grange, Co. Sligo.

The proposed site is located within the western environs of Grange Village and is situated behind the main Supervalu Supermarket and is accessed from existing site entrances onto the L3203 Streedagh Road. The site is ca. 200 meters from the main N15 Sligo to Donegal Road. Access to Streedagh Beach is within walking and cycling distance from the site.

The proposed development site is currently zoned in the Sligo County Development Plan 2017-2023 as GZT Zone: C5 – Tourism Related Uses.

Please refer to **Figure 2.2.2.2.1** for the site in its regional geographical context and **Figure 2.2.2.2.2** shows the site of the proposed development in its local context. **Figure 2.2.2.2.3** is as an illustrated aerial photo of the current site showing the key local geographical features.

The site has an existing concrete and stone structure close to the northern site boundary, which used to be a sawmill (see **Photograph 1 & 2**). It is proposed to retain and modify this building as a café on-site.

The site has a north to south orientation with the public road forming the northern site boundary. The land gently rises from midway in the site towards the south. The site is



surrounded by a mixture of mature treelines of ash and hawthorn, but there are also some standing pine trees to the east boundary of the site (see **Photograph 3 & 4**).

A stream known locally as the Aghagad stream flows underground via a culvert and emerges midway into the site at the eastern boundary and then flows as a small stream for ca. 70 metres in a north-west direction (**Photograph 5**). There is also an area of trees and scrub adjoining this stream.

The stream is then culverted under a hardcore surfaced area (which will become the car-parking area) before re-emerging at the north-western corner of the site, where it flows under the public road and along another field before joining with the Grange River (**Photograph 6**).

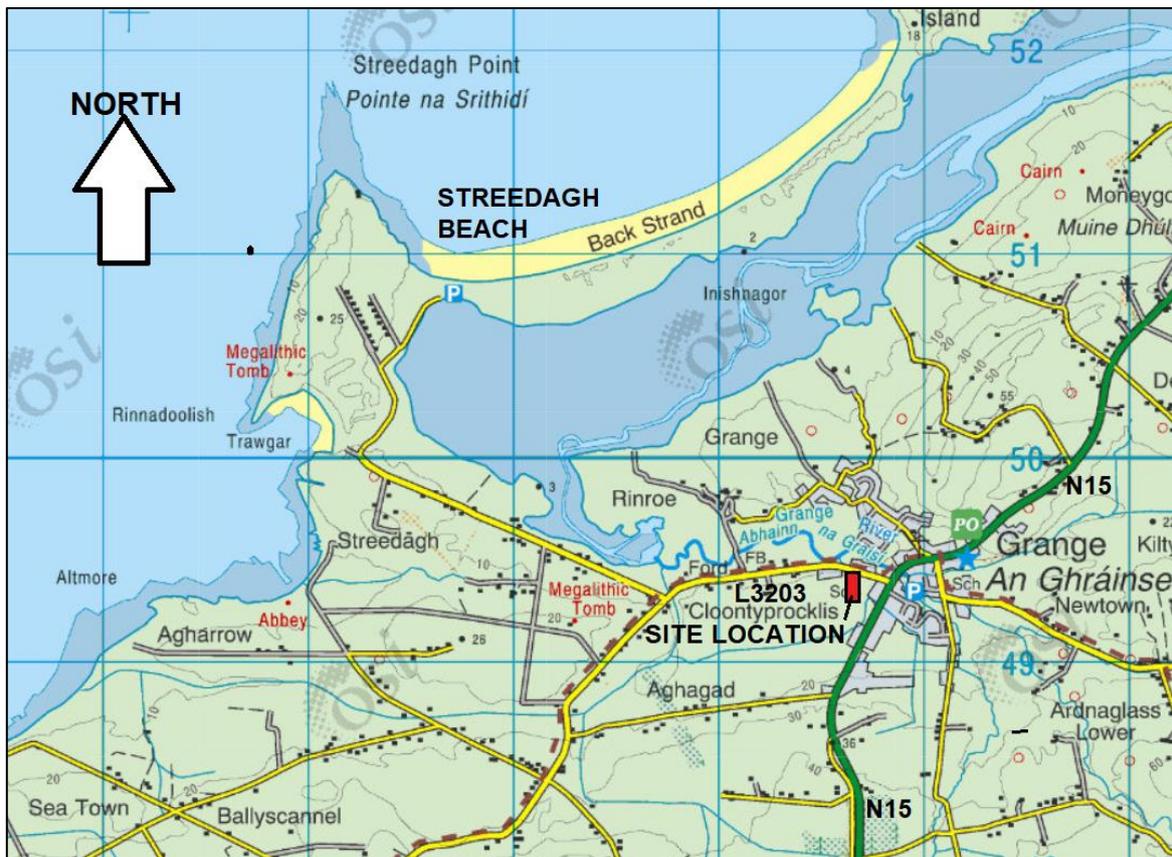


Figure 2.2.2.2.1: 1:50,000 Scale Map indicating site location (Source: myplan.ie)

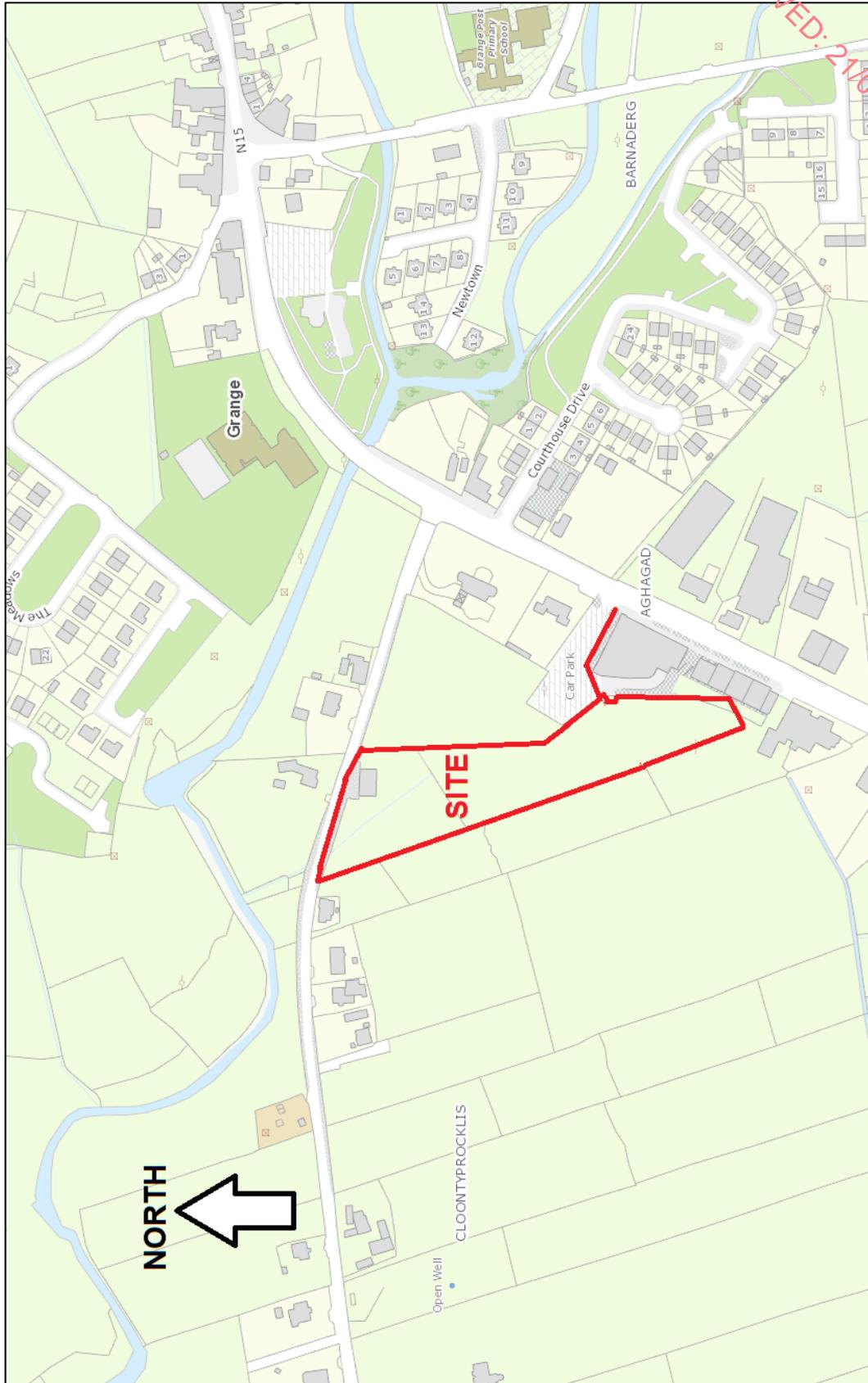


Figure 2.2.2.2.2: Site Location Map (Source: myplan.ie)



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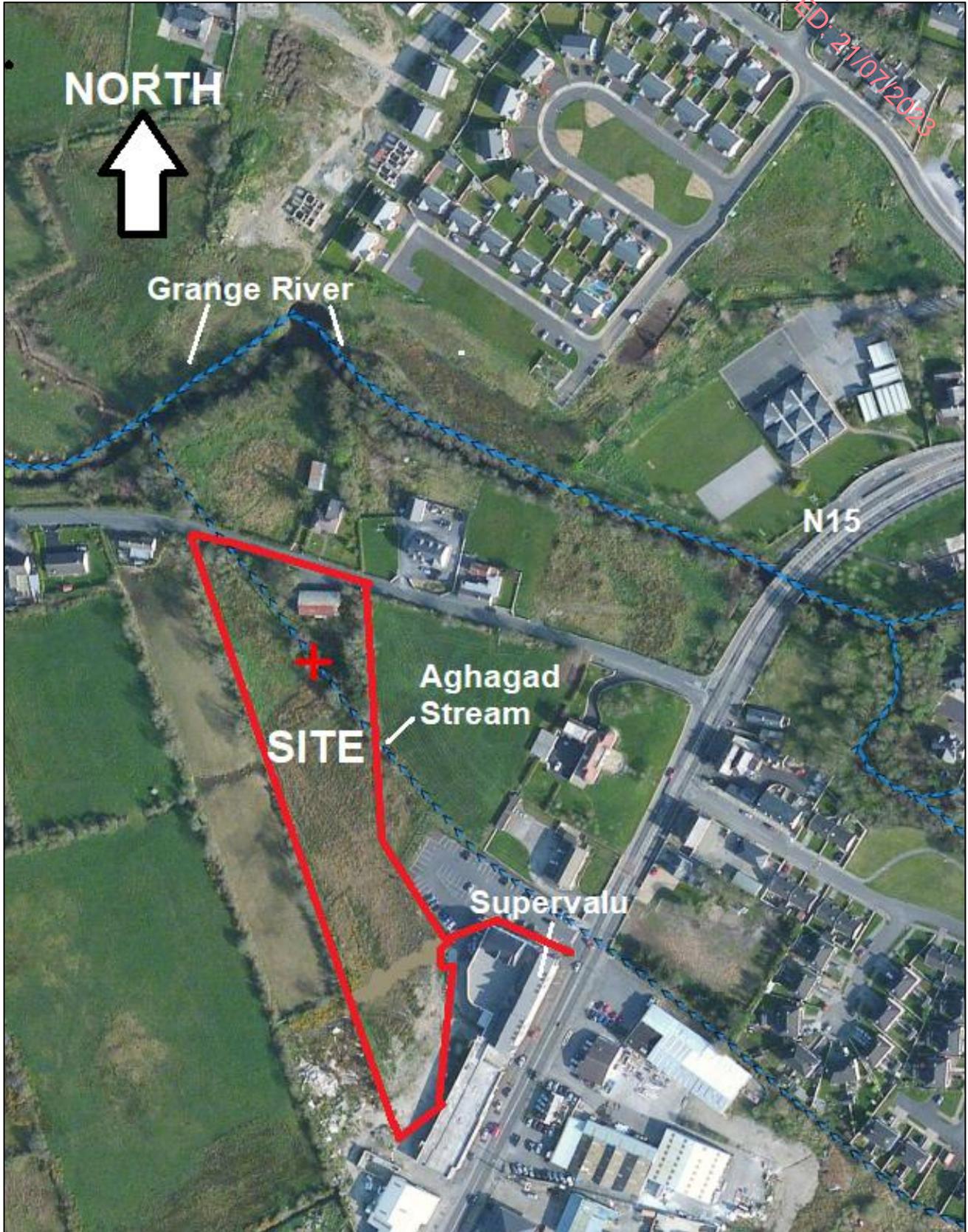


Figure 2.2.2.3: Aerial Photo of Proposed Site (Source: EPA Water Maps)



Photograph 1: View looking south at Building On-site from Road



Photograph 2: View looking West at Building On-site with Hardcore Hard Area



Photograph 3: View looking South up into Site



Photograph 4: View looking North from Stream towards The Building and Public Road



Photograph 5: Aghagad Stream Culvert Entering into Site and Flowing into Open Stream at Eastern Boundary of Site



Photograph 6: View of Aghagad Stream leaving the Site at North-West Roadside Corner



2.2.2.3 Proposed Development Details

The proposed site layout plan is shown in **Figure 2.2.2.3.1**.

North Shore Sligo will be a gateway to a world of relaxation and outdoor adventure. Located in the heart of Grange village the bespoke coastal cabins will make the perfect base for getting out and exploring all that Sligo's north coast and mountains have to offer. Architecturally designed, beautifully crafted, energy efficient they will be built to the highest standards and nestled sensitively into the existing site. Sitting directly below majestic Benbulbin the cabins will be secluded within the existing meadows, native hedgerows and mature tree lined boundaries.

At the entrance to the site the old Sawmill building on the Streedagh Road will be breathed back to life. The original cottage on this site is recorded on the historic Griffith Valuation maps from the 1800's. Maintaining and repurposing the building is the cornerstone of this project that will bring life into the heart of the village. Retaining its striking barrelled roof the building will house a café, design studio and craft shop. To the rear under the existing tree canopy a new woodland play area and pump track will be crafted.

Slipping back into the site, a new timber clad Nature Spa building will house treatment rooms, a sauna and seaweed baths. It will be home to the North Shore cabins' reception and screen the cabin meadows behind. The cabins will be accessed by simple pathways from the reception. Cars will be parked to the front of the site away from the cabins and visitors will remain undisturbed within the site's natural embrace.

North Sligo has renowned surf locations at Mullaghmore, Streedagh beach, Lislary and Staid Abbey, however surf facilities are conspicuous by their absence. North Shore hopes to change this by providing the first permanent surf hire and lessons base in the area. With the National Surf Centre due to open shortly in Strandhill a satellite surf hub in North Sligo can help Grange and the surrounding area emerge as a natural counterbalance in the county. This proposal is sensitive to the surrounding environment minimising the impact of the new cabins and nature spa on the surrounding landscape, while at the same time providing much needed amenities, employment and tourist accommodation for the village of Grange and its hinterland.

The proposed development will include:

- 8 no. Cabins with reception
- Café, design studio and craft shop (housed within existing building)
- Woodland park with playground and pump track
- Nature Spa including treatment rooms, sauna, seaweed baths
- Surf equipment hire and lessons
- Car Parking

Cabins

It is proposed that 8 cabins be positioned within the heart of the site hugging its western boundary. Drawing inspiration from Swedish design and the culture of Karin's homeland they will be a simple timber construction with an emphasis on clean and simple details that provide a sense of calmness. Charred timber cladding will allow them blend sensitively among the existing trees and meadows. The proposed cabins have a rectangular plan 4x8m, each with their own bathroom and kitchen facilities.



Café, Design Studio and Craft Shop

Housed within the reimagined old Sawmill building the cafe will complement the cabins and Nature Spa facilities. The design studio and craft shop will provide an outlet for local and artisan designers and products and tap the tourist potential of the Wild Atlantic Way.

Nature Spa

The Nature Spa will be sheltered between the existing mature trees on the site with views to Benbulbin's table plateau captured to the south. The spa will include treatment rooms, sauna and seaweed baths allowing visitors disconnect, immerse and recharge in nature.

Surf hire and lessons

North Sligo is a world-renowned destination for surfing, providing facilities for the sport will encourage water-sports tourism in the area, echoing the new National Surf Centre in Strandhill.



Figure 2.2.2.4: Proposed Site Layout Plan (Source: Architect for Project)



2.2.2.4 Site Habitat Survey

The ecology of the existing site at Cloontyprocklis, Grange, Co. Sligo has been described in accordance with *Fossit, J.A., 2000. A Guide to Habitats in Ireland, The Heritage Council, Kilkenny*. The author visited the site and carried out a habitat assessment and walk over survey on 12th March 2023.

The author has first-hand knowledge of the ecology of this area of County Sligo, having prepared several Appropriate Assessment Screening Reports and NIS documents for development sites in this area.

In addition, the following references have been used in the preparation of this habitat description:

- Devlin, Z. 2014. *The Wildflowers of Ireland – A Field Guide*: The Collins Press, Cork.
- Harrap, S, 2013. *Harrap's Wild Flowers – A Field Guide to Wild Flowers of Britain & Ireland*. Bloomsbury, London.
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- www.wildflowersireland.ie

The current site habitats consist of the following elements:

Habitat type BL3 – Buildings and Artificial Surfaces – this is the existing building on-site which is to be adapted to become the café and craft shop. This also includes the hard standing hardcore area to the northwest and northeast of the site which are due to become staff and visitor car parking areas.

This existing habitat type has no particular ecological conservation value. The proposed buildings of the accommodation pods on site will become this habitat type.

Wet Grassland (GS4) – The whole of the site site consists of a typical wet, semi-improved wet grassland agricultural fields. This is not peat and consists of wet dark organic soils. In places pre-development clearance and tidying up of scrub has occurred and some of these soils are unvegetated. Where the pods and other buildings are to be located, these will become **Habitat type BL3 – Buildings and Artificial Surfaces** and where there will be lawns and flowerbeds this will change to **Habitat Type GA2 – Amenity Grassland (Improved)** and **BC4 – Flowerbeds and Borders**.

Habitat FW4 – Drainage Ditches

A stream known locally as the Aghagad stream flows underground via a culvert from the Supervalu carpark and emerges midway into the site at the eastern boundary and then flows as an open small stream for ca. 70 metres in a north-west direction (**Photograph 5**). There is also an area of trees and scrub adjoining this stream consisting of brambles, young Ash,



Willow and Alder and this is considered **Habitat Scrub (WS1)** and **Habitat WS2 – Immature Woodland**. It is proposed to retain these habitats and to maintain the open stream through this portion of the site.

The stream is then culverted under a hardcore surfaced area (which will become the car-parking area) before re-emerging at the north-western corner of the site, where it flows under the public road and along another field before joining with the Grange River (**Photograph 6**).

Treeline (WL2) - The western boundary of the site is formed by a mature treeline consisting principally of mature Ash, Sycamore and Hawthorn with an understorey typified by Brambles, Ivy, Hogweed, Cleavers, Nettles, Thistles and Vetches which are all commonly found plants along field and hedgerow margins.

The existing treelines will be maintained on site as part of the eco-village as they are beneficial to wildlife and act as wildlife corridors for mammals and birds. On the mid-eastern boundary close to the stream are a number of mature Pine trees which will also be retained as part of the site development works.

Habitat ED3 – Recolonising Bare Ground

Where any site clearance and tidying works have occurred resulting in bare, unvegetated soils, then these are considered Recolonising Bare Ground.

The site habitat survey has demonstrated that the habitats on-site have low to medium biodiversity value and are non-priority habitats for conservation and are not listed in the Habitats Directive.

2.2.2.5 Site Hydrology and Surface Water Connectivity

Information pertaining to the site's hydrology both in a local and regional context has been derived from field evidence and the EPA Water Maps on-line – see **Figure 2.2.2.3**.

A stream known locally as the Aghagad stream flows underground via a culvert from the Supervalu carpark and emerges midway into the site at the eastern boundary and then flows as an open small stream for ca. 70 metres in a north-west direction (**Photograph 5**). There is also an area of trees and scrub adjoining this stream consisting of brambles, young Ash, Willow and Alder and it is proposed to retain these habitats and to maintain the open stream through this portion of the site.

The stream is then culverted under a hardcore surfaced area (which will become the car-parking area) before re-emerging at the north-western corner of the site, where it flows under the public road and along another field before joining with the Grange River (**Photograph 6**).

The Grange River flows in a westerly direction for ca. 800 metres and then flows into Streedagh Bay, which is also part of the Streedagh Point Dunes SAC.

Therefore it is important to assess in this AA screening Report whether there is likely to be any potential impact from the proposed development works upon the small Aghagad Stream which flows through the site which could then potentially impact upon water quality of the Streedagh Point Dunes SAC through hydrological linkage via the Grange River.



2.2.3 Step 3: Characteristics of the Site

2.2.3.1 Zone of Influence

The zone of influence of a proposed development is the geographical area over which it could affect the receiving environment in a way that could have significant effects on the Qualifying Interests of a European site. This should be established on a case-by-case basis using the Source-Pathway-Receptor framework and not by arbitrary distances (such as 15 km) – (Source: *Office of the Planning Regulator Practice Note PN01 Appropriate Assessment Screening for Development Management, March 2021*).

The identification of European sites within a 15km zone has become common practice in screening projects for AA. However, this approach is not based on the S-P-R model and should not be used for projects. Few projects have a zone of influence this large, but some more complex projects may require a greater zone of investigation. Instead, the zone of influence of a project should be considered using the Source-Pathway-Receptor model. This should avoid lengthy descriptions of European sites, regardless of whether they are relevant to the proposed development, and a lack of focus on the relevant European sites and issues of importance.

The zone of influence used in this screening statement is **2 km** from the site to take into account potential hydrological pathways to Natura 2000 sites. The zone of potential influence within the S-P-R model for this site is based on the potential risks (which are considered low), and the pathways associated with the type and nature of the proposed development.

2.2.4 Step 4: Screening Findings

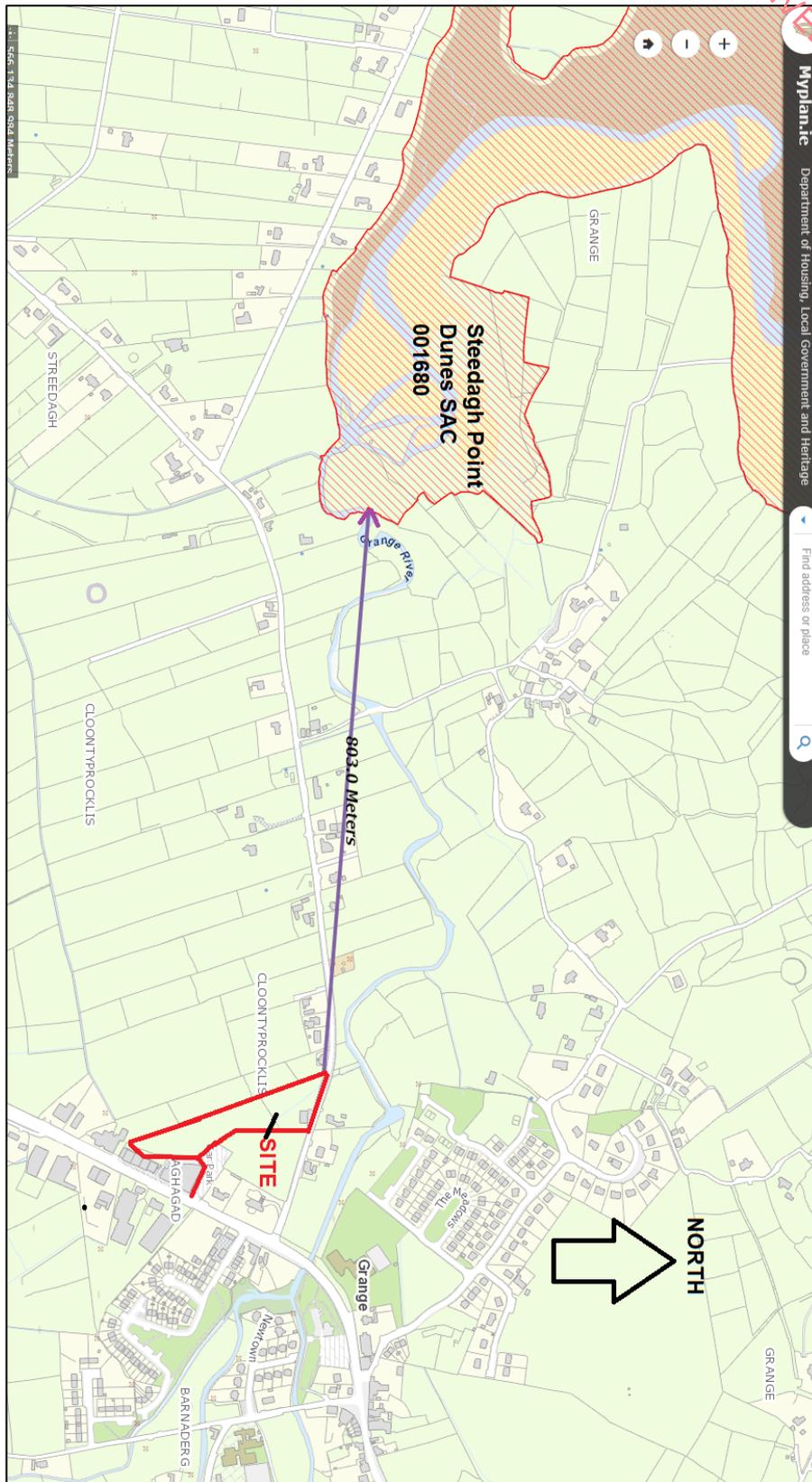
The proposed development site is **not** located within a Natura 2000 site (i.e. SAC or SPA). This has been confirmed through consultation with:

- NPWS website
- EPA Appropriate Assessment Screening GeoTool
- SAC and SPA maps provided at www.biodiveristyireland.ie.
- Myplan.ie

The map presented as **Figure 2.2.4.1** shows the proposed development site marked in relation to the zone of influence and shows the Natura 2000 site screened.

This information on Natura 2000 sites and their boundaries has been confirmed through consultation with the NPWS website and the SAC and SPA maps provided at www.biodiveristyireland.ie, www.epa.ie and www.myplan.ie.

Table 2.2.4.1 This summarises the Stage 1 Appropriate Assessment Screening information and forms the Screening Findings.



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Figure 2.2.4.1: Natura 2000 Site Screening Map for the Proposed Development at Cloontyprocklis, Grange, Co. Sligo (Source: myplan.ie)



Table 2.2.4.1: Natura 2000 Site Screened against Development Site at Cloontyprocklis, Grange, Co. Sligo

Name	Site Code	Designation	Qualifying Interests	Distance from the site (km)	Screen in/out/uncertainty
Streedagh Point Dunes SAC	001680	SAC	Mudflats and sandflats not covered by seawater at low tide [1140] Perennial vegetation of stony banks [1220] Atlantic salt meadows (Glauco-Puccinellietalia maritima) [1330] Mediterranean salt meadows (Juncetalia maritimi) [1410] Shifting dunes along the shoreline with Ammophila arenaria (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] Vertigo angustior (Narrow-mouthed Whorl Snail) [1014]	In excess of 803 metres to the west as the crow flies	Screen In due to Uncertainty Site distance is significantly removed at over 800 metres. No qualifying interests are within the proposed development site. However, site drainage is hydrologically linked to the Grange River via the on-site Aghagad Stream which does have hydrological connectivity with the Streedagh Point Dunes SAC. There is therefore a pathway from the site to the Grange River for potentially silt laden run-off water and pollutants such as hydrocarbons during construction phase. Therefore, there is uncertainty as to the potential for significant impacts and therefore Screen In for further assessment and carry out a Stage 2 NIS..

It is acknowledged that whilst other Natura 2000 sites may be a further distance than 2km from the site, these are considered outside of the zone of influence and are screened out from screening due to the large intervening distance, different and separate drainage catchments; no impact pathways; and the assessment that there will be no likely significant effects upon these sites.

Divergence to assess these sites removes the focus on assessing any potential impacts upon the Streedagh Point Dunes SAC which is the closest Natura 2000 site and is within the Source-Pathway-Receptor model due to potential indirect impacts associated with surface water drainage during the construction phase of the development.

The habitat types found within the site at Cloontyprocklis, Grange and in the immediate vicinity are non-priority habitats and none of the habitats or species found within the proposed site boundary are worthy of specific conservation. The on-site habitats have no particular ecological conservation value and do not form the basis of designation of the Streedagh Point



Dunes SAC, which are primarily Maritime or Coastal Habitats and therefore does not form a part of this Natura 2000 site in terms of feeding grounds; species regeneration or nesting.

Based on the location of the proposed site and that the proposed development site **is not** located within a Natura 2000 site (i.e. SAC or SPA) but is located over 803 meters from the closest Natura 2000 site - the Streedagh Point Dunes SAC, the AA Screening Assessment concludes that the only potential pathways between the proposed development site and the Natura 2000 Site is the possibility of indirect impacts from discharge of run-off surface waters containing silt or contaminants during the construction phase of the proposed development which could reach the Natura 2000 site, however unlikely that risk may be.

Therefore, having ascertained during the AA Screening that it is not possible to conclude, as a matter of scientific certainty that the proposed development will not have an effect on any Natura 2000 site, individually or together with other plans and projects, a NIS has been prepared as a precautionary measure to inform and assist the competent authority in carrying out the Appropriate Assessment.

The Site Synopsis for the Streedagh Point Dunes SAC is listed in **Appendix 1** of this report.

2.2.4.1 Assessment of Potential In-Combination Effects and Cumulative Impacts

In the preparation of this Appropriate Assessment screening due regard has been given to other developments within the geographical area, both existing, finished and proposed to assess any in combination and cumulative impacts.

The author has first-hand knowledge of the ecology of this area of County Sligo, having prepared several appropriate assessment screening reports around Grange Village including an Appropriate Assessment Screening Report within the same townland located ca. 1 km west of the proposed application site. This development was granted planning permission and was accompanied by an AA Screening Report and is currently under construction for a dwelling house.

The proposed development site is currently zoned in the Sligo County Development Plan 2017-2023 as GZT Zone: C5 – Tourism Related Uses.

The type of development proposed in the planning application can be facilitated under this zoning type. Therefore, the zoning has been considered in light of the Natura Impact Statement prepared as part of the current Sligo County Development Plan 2017-2023.

There was a requirement under the EU Habitats Directive (92/43/EEC) (as transcribed into Irish law) to assess whether the current Sligo County Development Plan, individually or in combination with other plans or projects, is likely to have significant effect on a European Site, which includes Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), in view of the site's conservation objectives.

The requirement for an assessment derives from Article 6 of the directive, and in particular Article 6(3) which requires that: "*Any plan or project not directly connected with or necessary to the conservation of a site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives.*"

In recognition of this, an Appropriate Assessment (AA) Screening was carried out, in parallel with the SEA process. From this it was determined that AA was required, and a Natura Impact Report was prepared to inform an AA. The assessment of the current Sligo County Development Plan has been carried out in the context of the scope and content presented in the plan.



The Natura Impact Report took a precautionary approach and assessed the impacts that would be anticipated from the plan providing the necessary inclusion of mitigation measures and guiding principles at the strategic level of the plan. The policies and objectives within the plan have been devised, as part of an iterative approach, to anticipate and avoid as appropriate measures that would likely have a significant adverse effect upon the integrity of the European Sites.

Where such measures might be permitted, on foot of provisions of the plan, they shall be required to conform to the mitigation measures contained in the Natura Impact Report (as transposed into the current Sligo County Development Plan and to the relevant regulatory provisions aimed at preventing pollution or other environmental effects likely to adversely affect the integrity of European Sites.

In addition, lower level projects arising from the implementation of the plan may themselves be subject to AA legislation when details of location and design become known. Based on the Natura Impact Report, and with reference to the scope of the plan, Sligo County Council has determined that the current Sligo County Development Plan is compliant with the requirements of Article 6 of the EU Habitats Directive as transposed into Irish law.

The SEA and AA processes have ensured that potential environmental impacts (both positive and negative) associated with the current Sligo County Development Plan have been given due consideration in the preparation of the plan.

Any adjacent sites to the proposed sites which have been granted planning permission by Sligo County Council will have been done so with consideration for potential in-combination effects.

Where any planning applications have been granted planning permission, Sligo County Council as the competent authority will have considered Appropriate Assessment in carrying out their planning functions and will have considered in combination effects for these developments.

Taking account of the above factors, it is considered that in-combination impacts have been taken into account in this appropriate assessment screening.

2.2.4.2 Conservation Objectives

The following are the general Conservation Objectives of the Streedagh Point Dunes SAC:

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

Favourable conservation status of a habitat is achieved when:

- its natural range, and area it covers within that range, are stable or increasing, and
- the specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future, and
- the conservation status of its typical species is favourable.



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The favourable conservation status of a species is achieved when:

- population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and
- the natural range of the species is neither being reduced nor is 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.

2.2.4.3 Site Specific Conservation Objectives for Streedagh Point Dunes SAC

The relevant document and reference for the site-specific conservation objectives for the Streedagh Point Dunes SAC is contained in the following publication and are summarised:

- *NPWS (2010) Conservation Objectives: Streedagh Point Dunes SAC 001680. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.*

The marine community type at the closest point of the SAC to where the Grange River enters the bay is shown on Map 4 as Sand with *Pygospio elegans* and *Cerastoderma edule* community complex. The *Vertigo angustior* (Narrow-mouthed Whorl Snail) [1014] is not shown to be present in this area as shown on Map 7 but is located further out towards the outer bay and within the sand dune communities.

Maps 3, and 5 of the Conservation Objectives for Streedagh Point Dunes SAC identifies the following Habitat types at the closest point of the SAC to where the Grange River enters the bay:

- 1140 Mudflats and sandflats not covered by sea water at low tide
- 1330 / 1410 Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) / Mediterranean salt meadows (*Juncetalia maritimi*)

The specific Conservation Objectives for these three habitats is shown below:

1140 Mudflats and sandflats not covered by seawater at low tide

To maintain the favourable conservation condition of Mudflats and sandflats not covered by seawater at low tide in Streedagh Point Dunes SAC, which is defined by the following list of attributes and targets:

Attribute	Measure	Target	Notes
Habitat area	Hectares	The permanent habitat area is stable or increasing, subject to natural processes. See map 3	Habitat area was estimated as 338ha using OSI data
Community distribution	Hectares	Conserve the following community types in a natural condition: Sand with <i>Pygospio elegans</i> and <i>Cerastoderma edule</i> community complex; Mobile sand with <i>Haustorius arenarius</i> and polychaetes community complex. See map 4	Based on an intertidal survey undertaken in 2011 (MERC, 2012). See marine supporting document for further information



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Conservation Objectives for : Streedagh Point Dunes SAC [001680]

1330 Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)

To restore the favourable conservation condition of Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) in Streedagh Point Dunes SAC, which is defined by the following list of attributes and targets:

Attribute	Measure	Target	Notes
Habitat area	Hectares	Area stable or increasing, subject to natural processes, including erosion and succession. For sub-site mapped: Streedagh Point - 12.82ha. See map 5	Based on data from the Saltmarsh Monitoring Project (SMP) (McCorry and Ryle, 2009). One sub-site that supports Atlantic Salt Meadows was mapped (12.82ha) and additional areas of potential ASM habitat (0.21ha) were identified from an examination of aerial photographs, giving a total estimated area of 13.03ha. NB further unsurveyed areas maybe present within the SAC. See coastal habitats supporting document for further details
Habitat distribution	Occurrence	No decline or change in habitat distribution, subject to natural processes. See map 5 for known distribution	Based on data from McCorry and Ryle (2009). The saltmarsh at Streedagh is widely distributed throughout the SAC. See coastal habitats supporting document for further details
Physical structure: sediment supply	Presence/ absence of physical barriers	Maintain natural circulation of sediments and organic matter, without any physical obstructions	See coastal habitats supporting document for further details
Physical structure: creeks and pans	Occurrence	Maintain creek and pan structure, subject to natural processes, including erosion and succession	Based on data from McCorry and Ryle (2009). A large area of ASM on the spit is unmodified and in relatively good condition. See coastal habitats supporting document for further details
Physical structure: flooding regime	Hectares flooded; frequency	Maintain natural tidal regime	See coastal habitats supporting document for further details
Vegetation structure: zonation	Occurrence	Maintain range of coastal habitats including transitional zones, subject to natural processes including erosion and succession	Based on data from McCorry and Ryle (2009). The ASM at Streedagh is quite diverse and several typical ASM communities were noted by the SMP. The ASM is part of a larger coastal ecosystem. See coastal habitats supporting document for further details
Vegetation structure: vegetation height	Centimetres	Maintain structural variation within sward	Based on data from McCorry and Ryle (2009). Most of the saltmarsh is grazed by cattle though intensity varies and some areas are left ungrazed. Heavy grazing was noted adjacent to the sandhills at Streedagh in a commonage area. See coastal habitats supporting document for further details
Vegetation structure: vegetation cover	Percentage cover at a representative sample of monitoring stops	Maintain more than 90% area outside creeks vegetated	Based on data from (McCorry and Ryle, 2009). At Streedagh there is some severe poaching of the saltmarsh by cattle in the commonage adjacent to the sandhills. See coastal habitats supporting document for further details
Vegetation composition: typical species and sub-communities	Percentage cover at a representative number of monitoring stops	Maintain range of sub-communities with typical species listed in SMP (McCorry and Ryle, 2009)	See coastal habitats supporting document for further details
Vegetation structure: negative indicator species - <i>Spartina anglica</i>	Hectares	There is currently no common cordgrass (<i>Spartina anglica</i>) recorded at this SAC. This species should be prevented from establishing here	Based on data from McCorry and Ryle (2009). Common cord grass (<i>Spartina anglica</i>) is absent from the site. See coastal habitats supporting document for further details



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Conservation Objectives for : Streedagh Point Dunes SAC [001680]

1410 Mediterranean salt meadows (*Juncetalia maritimi*)

To maintain the favourable conservation condition of Mediterranean salt meadows (*Juncetalia maritimi*) in Streedagh Point Dunes SAC, which is defined by the following list of attributes and targets:

Attribute	Measure	Target	Notes
Habitat area	Hectares	Area stable or increasing, subject to natural processes, including erosion and succession. For sub-site mapped: Streedagh Point - 6.69ha. See map 5	Based on data from the Saltmarsh Monitoring Project (SMP) (McCorry and Ryle, 2009). One sub-site that supports Mediterranean Salt Meadows was mapped, giving a total estimated area of 6.69ha. NB further unsurveyed areas maybe present within the SAC. See coastal habitats supporting document for further details
Habitat distribution	Occurrence	No decline, subject to natural processes. See map 5 for known distribution	See coastal habitats supporting document for further details
Physical structure: sediment supply	Presence/absence of physical barriers	Maintain natural circulation of sediments and organic matter, without any physical obstructions	See coastal habitats supporting document for further details
Physical structure: creeks and pans	Occurrence	Maintain creek and pan structure, subject to natural processes, including erosion and succession	Based on data from McCorry and Ryle (2009). See coastal habitats supporting document for further details
Physical structure: flooding regime	Hectares flooded; frequency	Maintain natural tidal regime	Mediterranean salt meadows is found high up in the saltmarsh but requires occasional tidal inundation. See coastal habitats supporting document for further details
Vegetation structure: zonation	Occurrence	Maintain range of saltmarsh habitats including transitional zones, subject to natural processes including erosion and succession	Based on data from McCorry and Ryle (2009). The MSM at Streedagh is quite diverse and some transitional vegetation has developed along the upper MSM in places. It is part of a larger coastal ecosystem. See coastal habitats supporting document for further details
Vegetation structure: vegetation height	Centimetres	Maintain structural variation in the sward	See coastal habitats supporting document for further details
Vegetation structure: vegetation cover	Percentage cover at a representative number of monitoring stops	Maintain more than 90% of area outside creeks vegetated	See coastal habitats supporting document for further details
Vegetation composition: typical species and sub-communities	Percentage cover at a representative number of monitoring stops	Maintain range of sub-communities with characteristic species listed in SMP (McCorry and Ryle, 2009)	Based on data from McCorry and Ryle (2009). Species of local distinctiveness such as saltmarsh flat-sedge (<i>Blysmus rufus</i>) was recorded in the MSM and forms a distinctive community in places in the upper marsh. See coastal habitats supporting document for further details
Vegetation structure: negative indicator species - <i>Spartina anglica</i>	Hectares	There is currently no common cordgrass (<i>Spartina anglica</i>) recorded at this SAC. This species should be prevented from establishing here	Based on data from McCorry and Ryle (2009). Common cord grass (<i>Spartina anglica</i>) is absent from the site. See coastal habitats supporting document for further details.



The Conservation Objectives for Streedagh Point Dunes SAC specify the conservation objectives for each species and habitats listed in the qualifying interests for the sites as set out in **Table 2.2.4.1**.

As it has been determined that there will be no direct impacts upon either species or habitats associated with the Streedagh Point Dunes SAC from the proposed development due to the intervening distance 803 metres and greater, the conservation objectives should be considered in light of potential indirect impacts by means of water quality change and how this may impact upon the sites as a whole.

A negative change to water quality is contrary to the Water Framework Directive and is potentially negative to the health of any aquatic habitats of an SAC site in terms of feeding grounds; species composition for food for birdlife and potential impact upon aquatic invertebrates and fish populations.

However, if a proposed development can demonstrate that it would not be likely to cause an impact upon water quality either on it's own or in combination with other developments, through the implementation of mitigation measures, then this can meet the conservation objectives of a Natura 2000 site.

2.2.5 Appropriate Assessment Screening Conclusion

Based on the location of the proposed site and that the proposed development site **is not** located within a Natura 2000 site (i.e. SAC or SPA) but is located over 803 meters from the closest Natura 2000 site - the Streedagh Point Dunes SAC, the AA Screening Assessment concludes that the only potential pathways between the proposed development site and the Natura 2000 Site is the possibility of indirect impacts from discharge of run-off surface waters containing silt or contaminants during the construction phase of the proposed development which could reach the Natura 2000 site, however unlikely that risk may be.

Therefore, having ascertained during the AA Screening that it is not possible to conclude, as a matter of scientific certainty that the proposed development will not have an effect on any Natura 2000 site, individually or together with other plans and projects, a NIS has been prepared as a precautionary measure to inform and assist the competent authority in carrying out the Appropriate Assessment.



3. NATURA IMPACT STATEMENT

3.1 Findings of Appropriate Assessment Screening

The AA Screening has ascertained that it is not possible to conclude, as a matter of scientific certainty (without the inclusion of any mitigation measures) that the proposed development will not have an effect on any Natura 2000 site.

Based on the location of the proposed site and that the proposed development site **is not** located within a Natura 2000 site (i.e. SAC or SPA) but is located over 803 meters from the closest Natura 2000 site - the Streedagh Point Dunes SAC, the AA Screening Assessment concludes that the only potential pathways between the proposed development site and the Natura 2000 Sites is the possibility of indirect impacts from discharge of run-off surface waters containing silt or contaminants during the construction phase of the proposed development which could reach the Natura 2000 site, however unlikely that risk may be.

Therefore, a NIS has been prepared as a precautionary measure to inform and assist the competent authority in carrying out the Appropriate Assessment.

3.2 Consideration of Any Likely Significant Effects upon Natura 2000 Sites before any Mitigation Measures are adopted

As the site is outside of any Natura 2000 and is located over 803 metres as the crow flies from the Streedagh Point Dunes SAC (Site Code: 1680) there are **no likely direct impacts** upon Natura 2000 Sites.

The Potential for cumulative or in-combination impacts have been discussed in the Appropriate Assessment Screening Stage with no likely cumulative impacts predicted.

3.2.1 Direct Impacts

None of the qualifying interests of the Streedagh Point Dunes SAC, either habitats or species, occur within or directly adjacent to the proposed site. This has been determined during the habitat survey of the site and an assessment of the qualifying interests of the Natura 2000 sites.

The habitat types found within the site at Cloontyprocklis, Grange and in the immediate vicinity are non-priority habitats and none of the habitats or species found within the proposed site boundary are worthy of specific conservation. The on-site habitats have no particular ecological conservation value and do not form the basis of designation of the Streedagh Point Dunes SAC, which are primarily Maritime or Coastal Habitats and therefore does not form a part of this Natura 2000 site in terms of feeding grounds; species regeneration or nesting.

3.2.2 Indirect Impacts

A stream known locally as the Aghagad stream flows underground via a culvert from the Supervalu carpark and emerges midway into the site at the eastern boundary and then flows as an open small stream for ca. 70 metres in a north-west direction (**Photograph 5**). There is also an area of trees and scrub adjoining this stream consisting of brambles, young Ash, Willow and Alder and it is proposed to retain these habitats and to maintain the open stream through this portion of the site.

The stream is then culverted under a hardcore surfaced area (which will become the car-parking area) before re-emerging at the north-western corner of the site, where it flows under the public road and along another field before joining with the Grange River (**Photograph 6**).



The Grange River flows in a westerly direction for ca. 800 metres and then flows into Streedagh Bay, which is also part of the Streedagh Point Dunes SAC.

As the site drainage is hydrologically linked to the Grange River via the on-site Aghagad Stream which does have hydrological connectivity with the Streedagh Point Dunes SAC, there is therefore a pathway from the site to the Grange River for potentially silt laden run-off water and pollutants such as hydrocarbons during the construction phase.

3.3 Method Statement of Proposed Works Incorporating Mitigation and Precautionary Measures to Mitigate against any Impacts upon Surface Water Quality associated with the Streedagh Point Dunes SAC

3.3.1 Project Brief

The following is a Method Statement to be adopted during construction works. This is discussed in more detail below:

3.3.1.1 Site Demolition Works

No demolition works are necessary on this site as the old site building is to be modified for use as a café/craft shop.

3.3.1.2 Management of Soil & Excavations

The suitability of the soil conditions will be assessed on site by the Engineer and advice given as to the best course of action in terms of foundation construction.

A “silt fence” is to be installed on both the northern and southern banks of the Aghagad Stream which flows through part of the site.

This is to prevent silting or contaminated run-off from leaving the site towards the Streedagh Point Dunes SAC – however small the likelihood may be.

The “silt fence” is to remain in place for the duration of **the works – see Figure 3.3.1.2.1 and Figure 3.3.1.2.2.**

Site excavation works must be avoided during prolonged periods of rainfall to minimise the risk of surface water run-off.

Any vegetation that requires to be removed during site clearance shall be recovered off-site in an environmentally sound manner. No vegetation on site has any particular conservation value and is typical of the area.

Topsoil that is stripped back over is to be stockpiled away from the stream to prevent any risk of run-off. This will be covered with an impermeable membrane for later use on landscaping areas. This to reduce saturation of soil and risk of silting. This is shown in **Figure 3.3.1.2.1.**

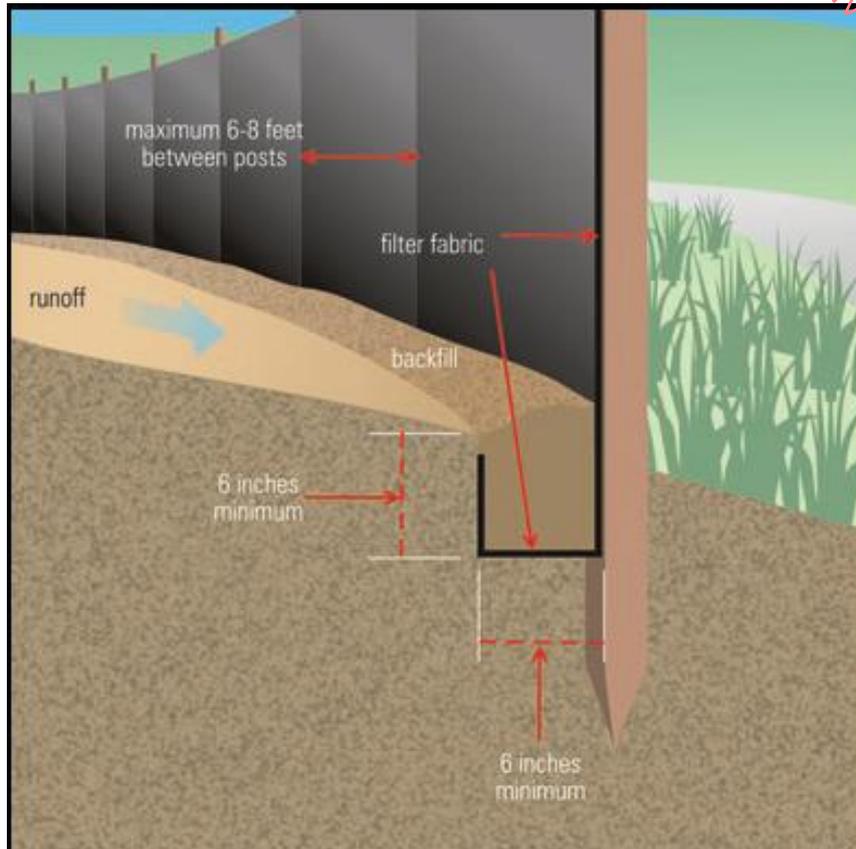


Figure 3.3.1.2.1: Example of EPA approved silt fence detail – temporary fence used during site works / construction phase.

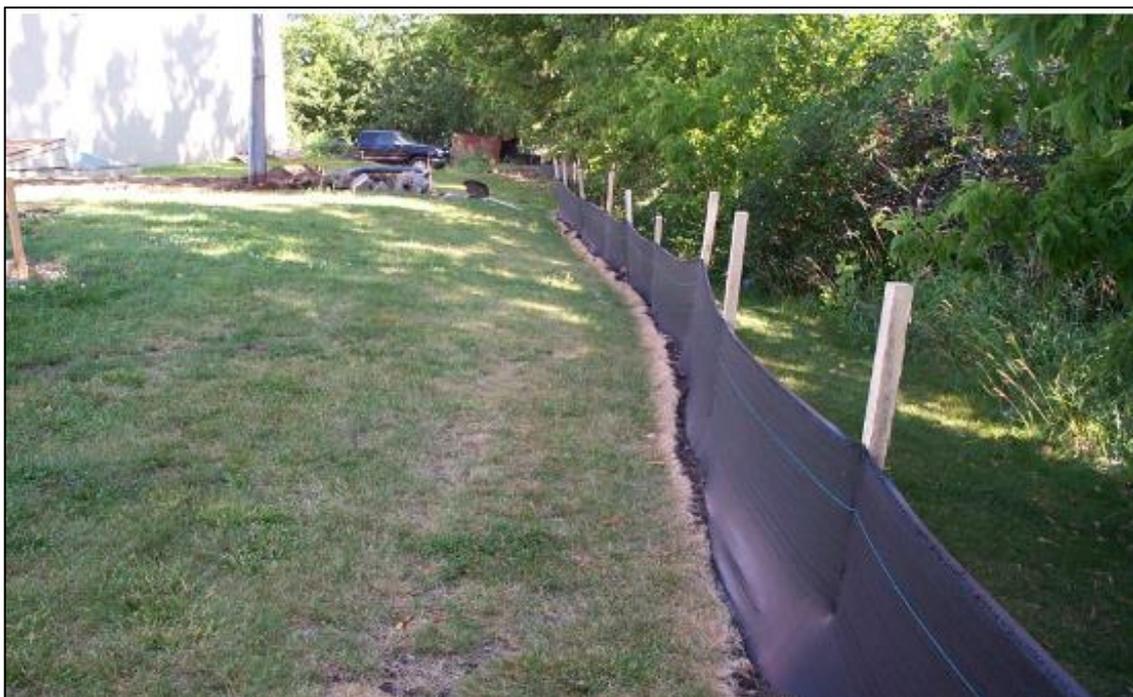


Figure 3.3.1.2.2: Example of silt fence in operation on similar site



Figure 3.3.1.2.1: Typical impermeable membrane used to dry store topsoil on site.

3.3.1.3 Washing of Truck Wheels

As the access and the proposed excavations works are not far from the public road it has been considered inappropriate to propose a wheel-wash station. The volume of soil likely to be excavated is relatively small and it is considered best practice to propose to manually power-hose any lorry if required.

As the excavated material can be removed within ca. 2 working days it will be possible to carefully monitor and control the dust and dirt created by such works with the cooperation of the excavator and truck drivers.

3.3.1.4 Timeline for the Construction Works

Pending the successful outcome from the Local Authority Planning Section it is predicted that development on site will begin immediately (allowing the appropriate 14-28 day notice period for the CN). The contractor when appointed to the contract will be expected to have the works undertaken and completed with 16-18 weeks. The above time estimate assumes favourable weather conditions and ground conditions are encountered.

3.3.1.5 Concrete Deliveries

It will be necessary to take delivery of a number of concrete mixer truck loads for the foundations and sub-floors. These are to be arranged and delivered in suitable weather conditions and under no circumstances should the mixers and chutes be washed out on site. They are to return to the quarry and wash-out at base within the designated wash bay areas.

3.3.1.6 Storage of Materials on Site

Diesel for machinery is to be brought to site only when required and containers are to be securely stored away.



All construction related materials required on site such as sand, cement, lime, insulations, chemical admixtures etc will be dry stored in a temporary storage container away from the on-site stream to avoid any potential contamination.

Deliveries such as sand will be stored in a designated storage area away from the stream. An impermeable membrane is to be used under this area with the sides folded up. It will be the responsibility of the appointed contractor to provide adequate and suitable storage of such materials required.

3.3.1.7 Surface Water Drainage

It is proposed to pipe any clean surface water and clean roof water to the on-site stream.

No contaminated drainage shall be put into any manholes or gullies which connect to the stream. Only clean roofwater and surface drainage off clean hard surfaces shall discharge to the surface water drainage system.

3.3.1.8 Wastewater Treatment

There is no proposal for on-site wastewater treatment and all such water will be directed to the existing main sewer that connects to the Grange Wastewater Plant. There is therefore no risk to the on-site stream from wastewater contamination.

3.4 Consideration of Any Likely Significant Effects upon Natura 2000 Sites Following Adoption of Mitigation Measures.

The following table is based on a table taken from the Box 4 of EC (2002) and sets out examples of significance indicators. This is being used as an impact prediction to assess the potential for significant impacts upon the Streedagh Point Dunes SAC (Site Code: 1680) from the proposed development works at the site at Cloontyprocklis, Grange, Co. Sligo.

This takes into account the project location; the project description; mitigation and precautionary measures which have been incorporated; and the status and ecology of the existing site for development.

Impact Type	Significance Indicator for this Site
Loss of Habitat Area	No Loss to any part of Natura 2000 Site
Fragmentation	No fragmentation to Natura 2000 Site
Disturbance	No Direct or Indirect disturbance to Natura 2000 Site
Species Population Density	No Change or Replacement of Species Population
Water Resource	No relative change to surface waters
Water Quality	No significant direct or indirect impact

The conclusions of the assessment of impacts upon the listed Natura 2000 site has shown that there will be no likely significant impacts upon the Natura 2000 site identified by the proposed development at Cloontyprocklis. This is further discussed below in more detail:



3.5 Impact Prediction & Conservation Objectives

3.5.1 Any impact on an Annex I habitat

The proposed site at Cloontyprocklis, Grange, Co. Sligo is located outside of any Annex 1 designated habitat and there will be no direct significant impacts on the Natura 2000 site or its Annex 1 habitats. The method statement for the construction works which includes mitigation and precautionary measures eliminates any potential for indirect impacts through site drainage or siltation potentially impacting upon the water quality of.

Therefore, it can be concluded that the proposed development will not compromise the maintenance of Annex I habitats for which the SAC has been selected at favourable conservation status.

3.5.2 Causing reduction in the area of the habitat or Natura 2000 site

The proposed works at the site at Cloontyprocklis, Grange, Co. Sligo will occur on non-priority habitats which will occur greater than 803 metres away from the Streedagh Point Dunes SAC site boundary.

There will be no loss of any area of Natura 2000 sites as a consequence of the proposed development and the proposed development will not result in any impact on any Annex II species of flora or fauna.

3.5.3 Causing direct or indirect damage to the physical quality of the environment (e.g. water quality and supply, soil compaction) in the Natura 2000 site

There will be no direct or indirect damage to the physical quality of the environment with the proposed development site. The site is outside of any Annex 1 designated habitat and there will be no significant impacts on any Natura 2000 site or their Annex 1 habitats.

The issue of wastewater management has already been discussed with the development connecting to the mains sewer.

A Method Statement has been prepared which deals with mitigation and precautionary measures to be undertaken during the site clearance stage and the construction phase.

The method statement for the construction works which includes mitigation and precautionary measures eliminates any potential for indirect impacts through site drainage or siltation potentially impacting the water quality of Streedagh Point Dunes SAC.

There will be no significant impacts via indirect means by surface water discharges as these have been carefully planned and designed to create no possibility of significant impacts upon the SAC site and its qualifying interests.

3.5.4 Causing serious or ongoing disturbance to species or habitats for which the Natura 2000 site is selected (e.g. increased noise, illumination and human activity)

The proposed development site will cause no disturbance during construction works. The construction works are physically separated from Streedagh Point Dunes SAC by over 803 metres. There is also an intervening road and lands between the site and the SAC.

The method statement for the construction works which includes mitigation and precautionary measures eliminates any potential for indirect impacts through site drainage or siltation potentially impacting upon the water quality of the Streedagh Point Dunes SAC .



The development poses no potential new impact or significant impact upon the maintenance of species or habitats at the Natura 2000 site.

3.5.5 Causing direct or indirect damage to the size, characteristics or reproductive ability of populations on the Natura 2000 site

The proposed development works at this existing site will have no direct or indirect damage to the size, characteristics or reproductive ability of populations on the Natura 2000 site.

The proposed development will not compromise or negatively impact upon water quality, which could impact upon fish populations and plant species and invertebrates upon which birdlife feed. There are no qualifying interests (habitats or species) associated with the SAC site which are present within the proposed development site.

3.5.6 Interfering with mitigation measures put in place for other plans or projects

The proposed development at this existing site will have no direct or indirect impacts upon mitigation measures put in place for other plans or projects. The proposed development is considered reasonable and well thought out and sensitive to the existing site, keeping well back from the SAC and being sensitive to the contours of the site and surrounding landscape.

3.5.7 Potential Cumulative Effects from Other Plans or Projects upon Natura 2000 Site

The proposed development at this existing site at Cloontyprocklis, Grange, Co. Sligo will have no significant negative direct or indirect impacts upon the Streedagh Point Dunes SAC site. The development will not create a cumulative impact upon the Natura 2000 site in combination with any other plans or projects.

3.5.8 Have the Conservation Objectives Been Met

It is reasonable to determine that the conservation objectives of a European Site will be met if its habitats and species are maintained at a favourable conservation status. Given that the proposed works at the site at Cloontyprocklis, Grange, Co. Sligo will not have a negative impact upon the Annex 1 Habitats or Annex II Species, nor upon surface waters through the implementation of precautionary and mitigation measures, it is concluded that the conservation objectives of the qualifying interests of the Streedagh Point Dunes SAC site will be met by allowing the works to proceed.

3.6 Conclusions of Natura Impact Statement Report

The findings and conclusions of the Appropriate Assessment Natura Impact Statement have been documented, with the necessary supporting evidence and objective criteria. The NIS conclusions are that the application for "*Proposed Eco-Tourism Village at Cloontyprocklis, Grange, Co. Sligo*" will:

1. Have no significant impact upon surface water quality either during the construction phase or the post construction phase. The proposed development will not cause deterioration of water quality, which would have a negative impact upon the Streedagh Point Dunes SAC site. This is confirmed through the precautionary and mitigation measures incorporated into the Method Statement for the construction works.
2. There will no loss of any Natura 2000 site area. There will be no loss or fragmentation of Annex I habitats; or Annex II species upon which any Natura 2000 site qualifies for its conservation status as a consequence of permitting the proposed development to proceed. This is due to the nature and limited scale of the proposed development and the separation



distance of over 803 metres of the actual site works from the Streedagh Point Dunes SAC site.

3. There will be no cumulative impact upon any Natura 2000 sites in combination with other plans or projects.

4. The proposed development will not compromise the maintenance of Annex I habitats for which any Natura 2000 site has been selected at favourable conservation status through the incorporation of appropriate mitigation measures which will suitably prevent any adverse impact on the integrity of the Natura 2000 network.

5. It is concluded that the conservation objectives of the Streedagh Point Dunes SAC site will be met as the habitats and species will be maintained at a favourable conservation status.

The NIS findings and conclusions remove all reasonable scientific doubt as to the effects that the works proposed may have on the Natura 2000 sites.

Therefore, on the basis of objective scientific and factual information pertaining to the site and the proposed works, the proposed development either individually or in combination with other plans/projects will not have any significant effects on a European site – namely the Streedagh Point Dunes SAC.

There is no scientific reason why the proposed development should be precluded from proceeding.

Yours sincerely,

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APPENDIX 1: SITE SYNOPSIS FOR STREEDAGH POINT DUNES SAC



RECEIVED: 21/07/2023

Site Name: Streedagh Point Dunes SAC

Site Code: 001680

Streedagh Point Dunes SAC is a sand dune and estuary system, and lies approximately 4 km west of Grange, a small village about 16 km north of Sligo town. The site consists of a tombolo formation, with a shingle spit overlain by sand dunes joining Conors Island to Streedagh Point. The landward side of the site comprises an area of sand flats, the estuary of the River Grange. The underlying bedrock is of stratified sedimentary rocks - argillaceous and oolitic limestones, conglomerates and chert; some strata are rich in fossils.

The site is a Special Area of Conservation (SAC) selected for the following habitats and/or species listed on Annex I / II of the E.U. Habitats Directive (* = priority; numbers in brackets are Natura 2000 codes):

- [1140] Tidal Mudflats and Sandflats
- [1220] Perennial Vegetation of Stony Banks
- [1330] Atlantic Salt Meadows
- [1410] Mediterranean Salt Meadows
- [2120] Marram Dunes (White Dunes)
- [2130] Fixed Dunes (Grey Dunes)*

- [1014] Narrow-mouthed Whorl Snail (*Vertigo angustior*)

Sand dunes extend along the length of the spit and cover the southern half of Conors Island. A boulder beach extends along the entire seaward side of the system. The dunes are accreting on the landward side and eroding on the northern, seaward side.

The embryo dunes are colonised primarily by Sea Sandwort (*Honkenya peploides*), Sea Campion (*Silene vulgaris* subsp. *maritima*) and small amounts of Sand Couch (*Elymus farctus*). At this site this habitat occurs in association with, and grades into, perennial vegetation of stony banks. A ridge of shifting marram dunes occurs along the entire length of the dune system. These are dominated by Marram (*Ammophila arenaria*), but include Colt's-foot (*Tussilago farfara*), clovers (*Trifolium* spp.), Ribwort Plantain (*Plantago lanceolata*) and Common Bird's-foot-trefoil (*Lotus corniculatus*).

The fixed dunes, which are a priority habitat on Annex I of the E.U. Habitats Directive, are well-developed. They contain some large sand hills and dune slacks, and are rich in plant species, particularly small herbs. Plant species occurring include Daisy (*Bellis perennis*), Wild Pansy (*Viola tricolor* subsp. *curtisii*), Wild Carrot (*Daucus carota*), Bulbous Buttercup (*Ranunculus bulbosus*), Field Wood-rush (*Luzula*



canpestris), Bramble (*Rubus fruticosus* agg.), Wild Thyme (*Thymus praecox*), Biting Stonecrop (*Sedum acre*), Common Cornsalad (*Valerianella locusta*), Rue-leaved Saxifrage (*Saxifraga tridactylites*), Bee Orchid (*Ophrys apifera*) and Pyramidal Orchid (*Anacamptis pyramidalis*). The dune slacks are rich in sedges (*Carex* spp.), with rushes (*Juncus* spp.) and Variegated Horsetail (*Equisetum variegatum*) also found.

The estuary of the River Grange consists of intertidal sandflats with areas of saltmarsh around the margins. The area of intertidal flats is fairly extensive, and extends for approximately 4 km. Saltmarsh on the site supports Thrift (*Armeria maritima*), Sea Plantain (*Plantago maritima*), Red Fescue (*Festuca rubra*), Lax-flavoured Sea-lavender (*Limonium humile*), Sea Rush (*Juncus maritimus*), Common Scurvygrass (*Cochlearia officinalis*), glassworts (*Salicornia* spp.) and turf fucoids (dwarfed seaweeds). Both Atlantic and Mediterranean types of saltmarsh are well-represented at the site.

The rare snail, *Vertigo angustior*, a species listed on Annex II of the E.U. Habitats Directive, has recently been recorded from sand dunes on the site. Common Seals haul out on sand banks in the site and Grey Seals have also been noted in the area. The locally-occurring butterfly, Dingy Skipper, has also been recorded on the site.

The estuary is used by moderate numbers of wintering waterfowl (all figures are average maximum counts for 1995/96 - 1998/99): Ringed Plover (14), Grey Plover (41), Brent Goose (30), Oystercatcher (113), Dunlin (298), Curlew (43) and Redshank (48). The site is also used by Terns and Chough, although these species do not nest here.

The main land uses within the site are sheep grazing and recreation, both of which have led to some erosion in the dunes, although in places grazing has maintained a short sward used by geese and Choughs for feeding.

The site contains a diversity of habitats and supports a wide range of vegetation communities and plant species. Six habitats found on the site are listed on Annex I of the E.U. Habitats Directive. The presence of fixed dunes, a habitat given priority status on this Annex, is of particular note. The site is also important for the presence of the rare snail, *Vertigo angustior*. The presence of wintering waterfowl adds to the significance of this site and the geological interest of Streedagh Point enhances its overall importance.